

CALIFORNIA COASTAL COMMISSION

South Coast District Office
301 E Ocean Blvd., Suite 300
Long Beach, CA 90802-4302
(562) 590-5071



W13b

LCP-5-LOB-20-0058-3 (City of Long Beach, Short-Term Rentals)

December 15, 2021

CORRESPONDENCE

From: Greta Hunold <gmhunold@gmail.com>

Sent: Wednesday, December 8, 2021 12:04 PM

To: SouthCoast@Coastal <SouthCoast@coastal.ca.gov>; Fiala, Shannon@Coastal <shannon.fiala@coastal.ca.gov>

Subject: Public Comment on December 2021 Agenda Item Wednesday 13b - City of Long Beach LCP Amendment No. LCP-5-LOB-20-0058-3 (Short-Term Rentals).

RE: LCPA No. LCP-5-LOB-20-0058-3

City of Long Beach

Item: W13b

December 15, 2021 Hearing

Greta Hunold

In favor of approval of IP Amendment with Suggested Modifications.

This letter was also sent to staff.

Honorable Commissioners and Staff,

I am a short-term rental host in Long Beach. Using my property as a vacation rental allows me to provide visitors with an authentic experience of the Southern California coast, while helping me save for property taxes and retirement.

Vacation rentals like mine are a huge draw to traveling families who want to explore Long Beach on a budget. These families spend money at local stores and venues, expanding the benefits of Long Beach's tourism economy to areas outside of traditional hotel districts.

The Long Beach ordinance, now a year in operation in non-coastal zones, has successfully demonstrated that short term rentals can operate responsibly, benefiting neighborhoods and residents, with a level of oversight and accountability provided by local government.

Most STR hosts have a little income boost from hosting that let's many afford to stay in neighborhoods they love, which supports neighborhood vitality and stability. Hosts act as ambassadors directing their guests to the best beaches, shops and restaurants Long Beach has to offer. Hosting also boosts tax revenue for cities to help pay for city services.

I support the certification of the Local Coastal Plan amendment request with suggested staff modifications.

I believe that adoption and certification of the staff recommendations supports visitor-serving coastal access for all income groups.

Sincerely,

Greta Hunold

District 6 in Long Beach

From: Ernestine Piskackova <piskackova.em@gmail.com>

Sent: Wednesday, December 8, 2021 4:19 PM

To: SouthCoast@Coastal <SouthCoast@coastal.ca.gov>

Subject: Public Comment on December 2021 Agenda Item Wednesday 13b - City of Long Beach LCP Amendment No. LCP-5-LOB-20-0058-3 (Short-Term Rentals).

Dear Commissioners,

Regarding the proposal that HOAs cannot prohibit STRs within their buildings, there are two particularly important features to consider:

1) Condominiums buildings generally do not have security staff or a front desk.

Access is limited to owners and long-term tenants, who are screened and interviewed before they receive a lease.

Allowing access to transient strangers in STRs compromises the security of all residents.

It is an undue burden to ask an HOA community to assume the security risks that STRs involve, especially in coastal Long Beach, where crime against persons and property is high.

2) HOA members share the cost of water, electricity, trash removal, and building upkeep.

One and two bedroom condos generally house 1-3 people, but the proposed rules allow 4-6 people in STRs, which results in a greater use of common resources and more wear and tear on the building.

Prohibiting HOAs from restricting STRs will result in HOA members having to subsidize them, due to their disproportionate use of resources -- again, an unfair burden. Many condo buildings in Long Beach are small (ours has twelve units) so additional shared costs make a large impact.

To broaden the perspective to the community as a whole and the issue of access and diversity, Long Beach has a diverse population and there are many affordable rentals in and around the coastal Alamitos Beach neighborhood. AirBnB, on the other hand, is notorious for discrimination against minorities, and scanning their website one can see that their members skew white and middle class. Properties that become STRs will displace people of color in a diverse neighborhood and contribute to homelessness (thus to crime and a greater need for well-secured buildings).

In the building in which I live, one third of the owners are Black, one third are white, one sixth are Latinx, and one sixth are Asian. Two thirds of the renters are people of color -- to run an STR here, one of them would need to be evicted.

Regarding inclusion: Because of the economic and ethnic diversity of Long Beach residents and a very efficient bus service, the beaches in the summer are heavily used by local people from poorer neighborhoods, who come on the bus with their families to spend a day at the beach. I suggest you visit Long Beach and observe this -- on the 4th of July the buses going down to the beach are standing room only. I would be sorry to see the families of color picnicking on the beach replaced by hip and affluent STR visitors. It would be helpful to look carefully at demographics and actual use of coastal resources before you make changes that may, in fact, undermine diversity.

Please think about the specifics of our community before you force more STRs on our neighborhoods. And please reconsider the fairness of requiring condo residents to compromise their security and pay increased utility and maintenance costs to accommodate STRs.

Thank you for your kind attention.

Yours sincerely,

Ernestine Piskáčková

--

Ernestine McHugh Piskáčková

Professor Emerita of Anthropology and Religion

University of Rochester

<https://www.upenn.edu/pennpress/book/13498.html>

From: Lars Sahanaja <lars.saha@gmail.com>

Sent: Wednesday, December 8, 2021 4:40 PM

To: Fiala, Shannon@Coastal <shannon.fiala@coastal.ca.gov>; SouthCoast@Coastal <SouthCoast@coastal.ca.gov>

Subject: Public Comment on December 2021 Agenda Item Wednesday 13b - City of Long Beach LCP Amendment No. LCP-5-LOB-20-0058-3 (Short-Term Rentals)

RE: LCPA No. LCP-5-LOB-20-0058-3

City of Long Beach

Item: W13b

December 15, 2021 Hearing

Indra Lars Sahanaja

In favor of approval of IP Amendment with Suggested Modifications

To the Commissioners and Staff,

Happy Holidays. I am a short-term rental host in Long Beach. Using my property as a vacation rental allows me to provide visitors with an authentic experience of the Southern California coast, while serving as a valuable income stream to help cover my mortgage, costs, and allow me and stay in my home. Vacation rentals like mine are a huge draw to traveling families who want to explore Long Beach on a budget. These families spend money at local stores and venues, expanding the benefits of Long Beach's tourism economy to areas outside of traditional hotel districts. In the wake of COVID, travelers want alternative options for a safe and hosted stay.

The Long Beach ordinance, now a year in operation in non-coastal zones, has successfully demonstrated that short term rentals can operate responsibly, benefiting neighborhoods and residents, with a level of oversight and accountability provided by local government. Most STR hosts have a little income boost from hosting that let's many afford to stay in neighborhoods they love, which supports neighborhood vitality and stability. Hosts act as ambassadors directing their guests to the best beaches, shops and restaurants Long Beach has to offer. Hosting also boosts tax revenue for cities to help pay for city services. I support the certification of the Local Coastal Plan amendment request with suggested staff modifications. I believe that adoption and certification of the staff recommendations supports visitor-serving coastal access for all income groups.

Furthermore, I strongly feel that **Accessory Dwelling Units (ADUs) that are owner-occupied OR constructed before the state law AB 3182 was enacted should be removed from the prohibited buildings list.** California state law AB 3182, which limits ADU vacation rentals also states that if the owner lives in either the main residence or an ADU on the property, then the property does not count as a rental unit and doesn't necessarily need to be subject to the prohibitive use of ADUs for short-term-rental. Yet the current Long Beach ordinance has enacted a ban on ADU vacation rentals across-the-board with the reason simply being to comply with state law. However, the state law even makes allowance for owner-occupied properties and ADUs that predate state law.

Please consider these points in to modifying the ordinance to be best for hosts, guests, and the City of Long Beach. Thank you for you time and consideration.

Sincerely,

Indra Lars Sahanaja

Home Owner and Short-term Rental Host

District 5 in Long Beach - California Heights

From: Kathryn Levassiur <levassiurk@gmail.com>

Sent: Thursday, December 9, 2021 6:20 AM

To: SouthCoast@Coastal <SouthCoast@coastal.ca.gov>

Subject: Public Comment on December 2021 Agenda Item Wednesday 13b - City of Long Beach LCP Amendment No. LCP-5-LOB-20-0058-3 (Short-Term Rentals).

Dear Chair Padilla and CA Coastal Commissioners,

Support - Public Comment on December 2021 Agenda Item Wednesday 13b - City of Long Beach LCP Amendment No. LCP-5-LOB-20-0058-3 (Short-Term Rentals).

On behalf of our members, we stand in support of short term rental property owners in Long Beach and their rights to apply and qualify for STR permits, provide affordable visitor accommodations, collect and remit TOT and for the sensible modifications that the California Coastal Commission is recommending for the City of Long Beach, with the exception that the CCC and the City of Long Beach recognize accessory dwelling units (ADUs) as permitted dwellings for purposes of STR.

We applaud the recommended additional 350 STR permits in the coastal zone, separate from the 800 permit cap passed by Long Beach City Council and limiting the ability of building owners and majorities of census tracts to remove STRs from their geographic areas.

We thank you for the time and care taken to create and recommend these City of Long Beach STR regulation modifications.

Sincerely,
Kathryn Levassiur
Huntington Beach Short-Term Rental Alliance
Cell: 714.343.7931
Email: info@hbstra.org | Website: <https://www.hbstra.org/>



From: Jean Young <visitbeautifullongbeach@gmail.com>

Sent: Thursday, December 9, 2021 12:59 PM

To: SouthCoast@Coastal <SouthCoast@coastal.ca.gov>; Fiala, Shannon@Coastal <shannon.fiala@coastal.ca.gov>

Subject: Public Comment on December 2021 Agenda Item Wednesday 13b - City of Long Beach LCP Amendment No. LCP-5-LOB-20-0058-3 (Short-Term Rentals).



RE: LCPA No. LCP-5-LOB-20-0058-3

City of Long Beach

Item: W13b

December 15, 2021 Hearing

Eugenie Young, Long Beach Hosting Club Leader

In favor of approval of IP Amendment with Suggested Modifications.

This letter was also sent to staff.

Honorable Chair Padilla and CA Coastal Commissioners,

I am a 65-year old divorced female who has hosted in Long Beach since 2014. My demographic represents 60% of all US Airbnb hosts. Short term renting my property allows me to save for property taxes and retirement, while providing visitors with a unique, personalized experience of Southern California, including our beautiful coastline and its beaches.

Vacation rentals like mine are a huge draw to traveling families who want to explore Long Beach on a budget. These

families spend money at local stores and venues, expanding the benefits of Long Beach's tourism economy to areas outside of traditional hotel districts.

The Long Beach ordinance, now a year in operation in non-coastal zones, has successfully demonstrated that short term rentals can operate responsibly, benefiting neighborhoods and residents, with a level of oversight and accountability provided by local government. City rules have weeded out the bad actors while protecting the right of homeowners like me to rent out our homes.

Most STR hosts say that hosting helps them afford to stay in neighborhoods they love, which supports neighborhood vitality and stability. Hosts act as ambassadors directing their guests to the best beaches, shops and restaurants Long Beach has to offer. Hosting also boosts tax revenue for cities to help pay for city services.

I support the certification of the Local Coastal Plan amendment request with suggested staff modifications. My only additional recommendation is that Accessory Dwelling Units (ADUs) permitted and constructed before the Long Beach ordinance was enacted be removed from the STR prohibited buildings list.

Sincerely,

Eugenie Young
Leadership Team
Long Beach Hosting Club
Cell/Text 562-857-2427
visitbeautifullongbeach@gmail.com

From: rmcheek@dnxengineers.com <rmcheek@dnxengineers.com>

Sent: Friday, December 10, 2021 11:34 AM

To: SouthCoast@Coastal <SouthCoast@coastal.ca.gov>

Cc: 'Hamlet Vazquez' <hvazquez@actionlife.com>; 'Rola Karam' <rkaram@westoceanhoa.com>; 'Mike Dunfee' <mdunfee@westoceanhoa.com>; 'Daniel Kenber' <dkenber@westoceanhoa.com>; 'Wendy Sauls' <wsauls@westoceanhoa.com>

Subject: Public Comment on December 2021 Agenda Item Wednesday 13b - City of Long Beach LCP Amendment No. LCP-5-LOB-20-0058-3 (Short-Term Rentals)

Our condominium is our home along with 255 other households. It is not reasonable that we have some control over what kind of residency is allowed in our building. We currently allow owners to rent their unit for 30 days which allows for property rights of owners yet maintains the character of the homes we purchased in a busy city. We in no way restrict the beach and tourist activity in the area. Please do not further restrict our ability to enjoy our safe and friendly environment.

Ron Cheek
President, West Ocean Association

Ronald M. Cheek, PE
400 W Ocean Blvd. Unit 1503
Long Beach, CA 90802
(714)394-4035



December 10, 2021

Steve Padilla, Chair
Coastal Commissioners
55 Market Street, Suite 300
San Francisco, CA 94105

RE: Item 13b: City of Long Beach LCP Amendment No. (LCP-5-LOB-20-0058-3)

Dear Chair Padilla and Honorable Commissioners:

Better Neighbors LA and Unite HERE Local 11 are writing regarding the LCP Amendment Request (No. LCP-5-LOB-20-0058-3) (the “Proposed Amendment”) and recommend the Coastal Commission reject the Proposed Amendment. Our recommendation is that short-term rentals in the Long Beach coastal zone be hosted to ensure that they remain affordable and do not negatively impact coastal housing, residential character, and coastal access. In addition, it is our position that the set-aside of 350 short-term rental permits is unnecessary and will only result in short-term rentals in excess of the current cap of 800 permits.

Better Neighbors LA and Unite HERE Local 11 have engaged with the impacts of short-term rentals on local communities, workers, and the housing market. Better Neighbors LA is a coalition of neighbors, hoss, and housing advocates working to encourage sustainable and fair short-term rentals. Unite HERE Local 11 is a labor union representing more than 32,000 hospitality industry workers including within the City of Long Beach. Unite HERE Local 11 has an extensive history of examining the impact of short-term rentals on coastal zone communities including as recently as October 2020 in Laguna Beach during which they engaged in similar issues to those raised here.

In the course of our work related to short-term rentals, it has become increasingly clear that unhosted, or whole home, short-term rentals do not increase coastal access and instead reduce the supply of low and moderate cost housing that the Coastal Act requires the Commission and cities to protect. The proliferation of unhosted short-term rentals simply creates more luxury options for the wealthiest travelers. In fact, unhosted short-term rental units are often marketed as luxury hotel rooms and have appropriate room rates to match. Moreover, these types of high-end units can also crowd our existing affordable motels and mid-range hotels and the development of future properties, decreasing affordable coastal access.

The purpose of the Proposed Amendment is to ensure “appropriate STR stock is maintained,” and “to preserve the amount of STRs that have generally operated within the Long Beach coastal zone.” The Proposed Amendment, however, conflates robust and meaningful coastal access with the proliferation of short-term rentals.

An overly narrow focus on preserving short-term rentals is inconsistent with the Commission's goal to ensure coastal access for all Californians today, and in the long term. For example, the proliferation of short-term rentals has been closely tied to increasingly housing costs and accelerated gentrification, both of which not only place a burden on the existing coastal communities but serve to, over time, increase local costs of housing and the cost of living generally. As residential areas gentrify so too do the costs of nearby tourist accommodations. The Coastal Commission cannot regulate the prices for which short-term rentals are offered now or in the future and what are affordable accommodations today can easily develop into exclusive luxury accommodations tomorrow.

The City of Long Beach has determined that a cap of 800 permitted short-term rentals would best protect its housing stock while allowing short-term rentals to increase its communities' capacities to accommodate travelers. The Proposed Amendment requires that cap be increased by as much as 43.8% to ensure that 350 unhosted short-term rentals are located within the coastal zone. This "set aside" is unnecessary. First, the Proposed Amendment does not take into consideration the existing 977 overnight accommodations within the coastal zone in existing hotels, motels and an RV park. In addition, the City of Long Beach has 350 registered short-term rentals; leaving another 450 permits available for the existing 350 coastal zone short-term rentals the Proposed Amendment seeks to protect. The proposed set-aside would only serve to force the City of Long Beach to exceed its existing cap. If the Proposed Amendment wishes to ensure that the 350 coastal short-term rentals are licensed, they should instead, require those existing short-term rentals register immediately so they are properly permitted under the existing cap. This would allow the Commission to adopt the substance of the Proposed Amendment without overburdening the City of Long Beach with excessive short-term rentals.

In drafting its Short-Term Rental Ordinance, the City of Long Beach distinguished between hosted and unhosted rentals. Hosted short-term rentals are generally operated by individual operators renting out spare space in their own homes. Unhosted short-term rentals are most often associated with housing that is removed from the housing market and dedicated to hosting tourists alone. The latter, as unsupervised, tend to pose the greatest threat to communities in the form of "party-houses" that disturb neighbors are deleterious to residential areas. To protect coastal communities, and maintain their residential character, the Coastal Commission should require that all short-term rentals must be hosted. This would allow the same number of short-term rentals to operate, but they would be much less likely to drain Long Beach's housing stock, raise rents, and raise the cost of living. Ensuring short-term rentals are all hosted would better serve to ensure that the City of Long Beach is accessible and affordable to all Californians.

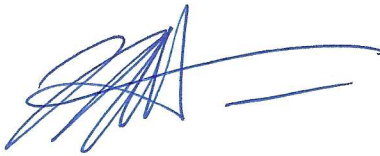
The Proposed Amendment would also require property owners to seek a Coastal Commission permit to opt out of the short-term rental industry, regardless of whether any STRs currently operate, or ever have operated, there previously. This proposal could easily lead to absurd results. For example, the Proposed Amendment would not require property owners to seek a permit to convert an apartment or a single-family home into a tourist accommodation. In contrast, the owner of an apartment building would be required to seek a permit to prohibit short-

term rentals at the property. Even if there never existed any short-term rentals at the property, the owner would be required to seek a permit to register said prohibition with the City of Long Beach. In effect, the property owner would be forced to seek a permit to make no changes at all to the property or how it is used.

The Long Beach Short-Term Rental Ordinance also allows residents within a census track to petition to require short-term rentals within that census track to be hosted. The Proposed Amendment would also require communities to seek a Coastal Commission. However, whether a short-term rental is hosted or not cannot affect coastal access. The census track petitions cannot wholly prohibit short-term rentals and cannot reduce the number of available accommodations. Such petitions could only require short-term rentals be hosted. As discussed above, increasing the number of hosted short-term rentals would serve to protect the character of the coastal zone's residential communities.

By focusing on how short-term rentals operate within and affect their local communities in the long-term, the Coastal Commission can better its regulation to ensure coastal access to more Californians. The Proposed Amendment's focus on increasing only the number of short-term rentals fails to consider the larger picture that the City of Long Beach faces as it shapes its housing and tourist policies.

Respectfully,

A handwritten signature in blue ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

Unite HERE Local 11 and Better Neighbors LA



December 10, 2021

Steve Padilla, Chair
Coastal Commissioners
55 Market Street, Suite 300
San Francisco, CA 94105

RE: Item 13b: City of Long Beach LCP Amendment No. (LCP-5-LOB-20-0058-3)

Dear Chair Padilla and Honorable Commissioners:

I am writing on behalf of the LA Alliance for a New Economy (LAANE) in opposition to the LCP Amendment Request (No. LCP-5-LOB-20-0058-3) and recommend the Coastal Commission reject the Proposed Amendment.

Our recommendation is that short-term rentals in the Long Beach coastal zone be hosted to ensure that they remain affordable and do not negatively impact coastal housing, residential character, and coastal access. In addition, it is our position that the set-aside of 350 short-term rental permits is unnecessary and will only result in short-term rentals in excess of the current cap of 800 permits.

LAANE has written several reports on short term rentals and been a part of the process of developing rules regulating them for the past 7 years. Our research shows that short term rentals harm the supply of low and moderate cost housing that the Coastal Act requires the Commission and cities to protect. Indeed, the proliferation of unhosted short-term rentals simply creates more luxury options for the wealthiest travelers. In fact, unhosted short-term rental units are often marketed as luxury hotel rooms and have appropriate room rates to match. Moreover, these types of high-end units can also crowd our existing affordable motels and mid-range hotels and the development of future properties, decreasing affordable coastal access.

The City of Long Beach has determined that a cap of 800 permitted short-term rentals would best protect its housing stock while allowing short-term rentals to increase its communities' capacities to accommodate travelers. The Proposed Amendment requires that cap be increased by as much as 43.8% to ensure that 350 unhosted short-term rentals are located within the coastal zone. This "set aside" is unnecessary. First, the Proposed Amendment does not take into consideration the existing 977 overnight accommodations within the coastal zone in existing hotels, motels and an RV park. In addition, the City of Long Beach has 350 registered short-term rentals; leaving another 450 permits available for the existing 350 coastal zone short-

term rentals the Proposed Amendment seeks to protect. The proposed set-aside would only serve to force the City of Long Beach to exceed its existing cap. If the Proposed Amendment wishes to ensure that the 350 coastal short-term rentals are licensed, they should instead, require those existing short-term rentals register immediately so they are properly permitted under the existing cap. This would allow the Commission to adopt the substance of the Proposed Amendment without overburdening the City of Long Beach with excessive short-term rentals.

In drafting its Short-Term Rental Ordinance, the City of Long Beach distinguished between hosted and unhosted rentals. Hosted short-term rentals are generally operated by individual operators renting out spare space in their own homes. Unhosted short-term rentals are most often associated with housing that is removed from the housing market and dedicated to hosting tourists alone. The latter, as unsupervised, tend to pose the greatest threat to communities in the form of “party-houses” that disturb neighbors are deleterious to residential areas. To protect coastal communities, and maintain their residential character, the Coastal Commission should require that all short-term rentals must be hosted. This would allow the same number of short-term rentals to operate, but they would be much less likely to drain Long Beach’s housing stock, raise rents, and raise the cost of living. Ensuring short-term rentals are all hosted would better serve to ensure that the City of Long Beach is accessible and affordable to all Californians.

The Proposed Amendment would also require property owners to seek a Coastal Commission permit to opt out of the short-term rental industry, regardless of whether any STRs currently operate, or ever have operated, there previously. This proposal could easily lead to absurd results. For example, the Proposed Amendment would not require property owners to seek a permit to convert an apartment or a single-family home into a tourist accommodation. In contrast, the owner of an apartment building would be required to seek a permit to prohibit short-term rentals at the property. Even if there never existed any short-term rentals at the property, the owner would be required to seek a permit to register said prohibition with the City of Long Beach. In effect, the property owner would be forced to seek a permit to make no changes at all to the property or how it is used.

By focusing on how short-term rentals operate within and affect their local communities in the long-term, the Coastal Commission can better its regulation to ensure coastal access to more Californians. The Proposed Amendment’s focus on increasing only the number of short-term rentals fails to consider the larger picture that the City of Long Beach faces as it shapes its housing and tourist policies.

Respectfully,

James Elmendorf

Policy Director

From: Daniel Fincher <daniel.fischer@gmail.com>
Sent: Friday, December 10, 2021 3:53 PM
To: SouthCoast@Coastal
Subject: Public Comment on December 2021 Agenda Item Wednesday 13b - City of Long Beach LCP Amendment No. LCP-5-LOB-20-0058-3 (Short-Term Rentals).

I have lived in Bluff Park for 15 years, our community is close and proud of our neighborhood. We are diverse, welcoming, kind and hospitable. I live in a historically maintained craftsman from 1905. The current situation with un hosted STRs is threatening our neighborhood.

I have an un-hosted STR next to me and it has made me distraught. Every week a new batch of people arrive and I live in fear and angst of what they will be like. It's a party house, literally, and one set of tenants actually arrived in a party bus. They are loud and disrespectful most of the time. They have littered my front yard with alcohol cups. They constantly have parties all the way up to 3am, weekdays and weeknights. I have two young children who are constantly woken up.

I've spoken to the owner and sent limitless texts at 1am, 2am, 3am complaining about the noise and disruption. We have called the police numerous times. With the revolving door of new groups each week, does that mean we text, call and complain forever?

The guidelines proposed by the coastal commission fall short of the necessary language. These STRs are receiving \$500+ per night, I don't see how this poses concerns of access. These aren't people looking for coastal access, they are party goers with no oversight. The owners have nothing other than financial gain in their interest and are left with no responsibility or oversight.

There should be a simple complaint process that can quickly resolve back STR owner practices, the number of STRs should be kept low.

Daniel Fincher