

**CALIFORNIA COASTAL COMMISSION**

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# W11c

**DATE:** February 26, 2026

**TO:** Commissioners and Interested Persons

**FROM:** Steve Hudson, Deputy Director  
Barbara Carey, District Manager  
Jacqueline Phelps, District Supervisor  
Brooke Lutz, Coastal Program Analyst

**SUBJECT:** City of San Buenaventura Local Coastal Program Amendment No. LCP-4-SBV-25-0043-1 (Short-Term Vacation Rentals) for public hearing and action at the March 11, 2026 Commission meeting in San Buenaventura.

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## SUMMARY OF STAFF RECOMMENDATION

The City of San Buenaventura (City of Ventura) is requesting an amendment to the Implementation Plan/Coastal Zoning Ordinance (IP/CZO) component of its certified Local Coastal Program (LCP) to add new provisions to address short-term vacation rentals (STVRs) and homestays. Specifically, the proposed amendment would modify the text of the IP to include definitions, development standards, permitting procedures, nuisance response plans, and enforcement provisions specifically relating to short-term vacation rentals and homestays. As proposed, short-term vacation rentals and homestays would be allowed in all residential zones with the approval of a ministerial short-term vacation rental or homestay permit, subject to the standards and requirements that are proposed in the subject amendment.

The City submitted Local Coastal Program Amendment LCP-4-SBV-25-0043-1 to the Commission on August 19, 2025. The amendment proposal was deemed complete and filed on September 4, 2025. At the October 8, 2025 hearing, the Commission granted a one-year time extension to act on the subject amendment pursuant to Coastal Act Section 30517 and California Code of Regulations, Title 14, Section 13535(c).

The proposed amendment would incorporate the City of Ventura's existing short-term vacation rental and homestay regulatory framework, codified in Chapter 6.455 of the Municipal Code, into the certified LCP so that these regulations apply within the Coastal Zone. Although the City has regulated STVRs since 2007 and recently adopted an ordinance to update its program to modernize definitions, permitting procedures, and operational standards, those regulations have not previously been incorporated into the certified LCP and therefore do not apply in the Coastal Zone. The amendment proposes to incorporate this Citywide ordinance into the LIP to

create a comprehensive permitting and regulatory framework for STVRs and homestays in the Coastal Zone consistent with the City's updated municipal standards and Coastal Act objectives, without modifying land use designations or zoning classifications.

The proposed amendment defines *short-term vacation rentals (STVRs)* as the use of an entire dwelling unit, other than a unit located in a "hotel," rented to a tenant for a period of not more than 30 consecutive days, and *homestays* as short-term rentals in owner-occupied dwellings. As proposed, STVRs and homestays are allowed in all residential zones, subject to a ministerial permit with annual renewal. New STVR permits are limited to one per owner, with transitional provisions addressing the continued eligibility of certain existing permits that may exceed newly established ownership or density limits. The proposed amendment also identifies dwellings that would be ineligible for use as an STVR or homestay, such as units subject to a recorded covenant, condition, or agreement restricting occupancy to a specific purpose, such as affordable housing or farmworker housing.

To address neighborhood compatibility and housing availability concerns, the proposal establishes area-based caps and density limitations for non-owner-occupied STVRs, while homestays are not subject to a numerical cap. Collectively, these neighborhood caps would authorize up to 355 non-owner-occupied STVR permits citywide. Neighborhood-specific caps for STVRs are proposed for Downtown (100 permits), Pierpont (100 permits), Harbor/Keys (35 permits), The Avenue (40 permits), Midtown (35 permits), and the Eastside (45 permits) (**Exhibit 1**). In addition, in Pierpont, STVRs would be limited to no more than ten percent of homes on any given lane (**Exhibit 1**). These provisions are designed to limit excessive concentrations of STVRs and reduce potential impacts on long-term housing supply and neighborhood livability.

Operational standards are included to protect residential character and reduce potential neighborhood impacts associated with visitor turnover and short-term occupancy. A minimum two-night stay is required, and the amendment establishes standards that address occupancy limits and requires onsite parking to ensure that short-term rental use does not displace parking that would otherwise be available for coastal access or neighborhood use. Additionally, the amendment establishes standards for noise, trash management, and complaint response, including a 24-hour nuisance response requirement. Enforcement provisions authorize suspension, revocation, or non-renewal of permits for noncompliance, with annual renewal contingent upon verification of continued compliance.

The proposed amendment does not prohibit or unduly restrict short-term vacation rentals in a manner that would diminish the public's ability to access and enjoy the coast. Further, the proposed ordinance does not conflict with the priority land uses identified in the LUP, nor does it raise issues with respect to public access or recreation policies. Rather, the proposed amendment establishes a regulatory framework that balances the provision of short-term visitor accommodations with the protection of

residential neighborhoods and housing availability. By including neighborhood-specific permit caps and density limits in coastal areas, the ordinance further ensures that STVRs remain compatible with the character of coastal residential neighborhoods. Therefore, the regulatory framework and restrictions of the STVR ordinance will conform with and be adequate to implement the certified City of Ventura Land Use Plan.

However, as proposed, the short-term vacation rental (STVR) and homestay regulations are contained in Chapter 6.455 of the City of Ventura Municipal Code which is not part of the certified LIP. The City proposes as part of this LCPA to incorporate Chapter 6.455 into the certified Local Coastal Program (LCP). Notwithstanding this proposal, the text of the STVR ordinance does not indicate that it is part of the LCP. Further, the LIP contains no indication that the outside Chapter 6.455 is part of the LCP. This could result in confusion for the public regarding what provisions comprise the LIP. In order to clarify, **Suggested Modifications 1 and 2** require that language is added in Chapter 6.455 and a new LIP Section 24.497 is added to state that Chapter 6.455 is incorporated into the certified LCP and to confirm that its regulations apply both within and outside the coastal zone.

**Suggested Modification 3** further clarifies these provisions through revisions to the two maps included as Appendices A and B. Finally, **Suggested Modification 4** includes minor modifications to the proposed text to ensure consistency with the LUP, further its intent and implementation, and avoid ambiguity. These modifications will not change the meaning or substantive provisions of the amendment. The suggested modifications were developed in cooperation with City staff, and City staff have indicated that they are supportive of the suggested modifications.

Staff recommends that the Commission, after public hearing, reject the proposed City of Ventura LCP Amendment No. LCP-4-SBV-25-0043-1 as submitted, and approve the amendment only if modified pursuant to **Suggested Modifications 1-4**. The suggested modifications are necessary to ensure that the proposed Implementation Plan/Coastal Zoning Ordinance (IP/CZO) amendment is consistent with and adequate to carry out the policies of the City's certified Land Use Plan (LUP) and the Chapter 3 policies of the Coastal Act. The motions and resolutions for Commission action can be found starting on **page 6** of this staff report.

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### **Exhibits**

**Exhibit 1** – Proposed Implementation Plan/Coastal Zoning Ordinance Amendment Text  
Changes in ~~Strikethrough~~/Underline

**Exhibit 2** – Ventura City Council Resolution No. 2025-18

## **I. PROCEDURAL OVERVIEW**

### **A. Standard of Review**

The Coastal Act provides:

The local government shall submit to the Commission the zoning ordinances, zoning district maps, and, where necessary, other implementing actions that are required pursuant to this chapter. (Section 30513)

...The Commission may only reject ordinances, zoning district maps, or other implementing action on the grounds that they do not conform with, or are inadequate to carry out, the provisions of the certified land use plan. If the Commission rejects the zoning ordinances, zoning district maps, or other implementing actions, it shall give written notice of the rejection, specifying the provisions of the land use plan with which the rejected zoning ordinances do not conform, or which it finds will not be adequately carried out, together with its reasons for the action taken. (Section 30513)

The Commission may suggest modifications... (Section 30513)

Any proposed amendments to a certified local coastal program shall be submitted to, and processed by, the commission in accordance with the applicable procedures and time limits specified in Sections 30512 and 30513... (Section 30514(b))

Pursuant to Sections 30513 and 30514(b) of the Coastal Act, the standard of review is whether the proposed IP amendment is in conformance with, and adequate to carry out, the provisions of the Land Use Plan (LUP) portion of the City's certified LCP.

### **B. Procedural Requirements**

If the Commission certifies the LCP amendment as submitted, no further City Council action will be necessary pursuant to Section 13544(b)(2) of Title 14 of the California Code of Regulations. Should the Commission deny the LCP Amendment, as submitted, without suggested modifications, no further action is required by either the Commission or the City Council, and the LCP amendment is not effective, pursuant to Section 13542(f). Should the Commission deny the LCP Amendment, as submitted, but then approve it with suggested modifications, then the City Council may consider accepting the suggested modifications and submitting them by resolution to the Executive Director for a determination that the City Council's acceptance is consistent with the Commission's action. In that scenario, pursuant to Section 13544(c) of Title 14 of the California Code of Regulations, the modified LCP Amendment will become final at the subsequent Commission meeting when staff provides notice of the Executive Director's Determination that the City Council's action in accepting the suggested modifications approved by the Commission for this LCP Amendment is legally adequate. If the City Council does not accept the suggested modifications within six months of the Commission's action, then the LCP amendment remains uncertified and not effective.

### **C. Public Participation**

Section 30503 of the Coastal Act requires the provision of maximum opportunities for public input in preparation, approval, certification and amendment of any LCP. The City held public hearings on the subject of this amendment request on October 23, 2024, and February 26, 2025. Additional public hearings were held with the City Council on November 19, 2024; December 10, 2024; and March 25, 2025. The hearings were duly noticed consistent with the provisions of Section 13515 of Title 14 of the California Code of Regulations. Notice of the Coastal Commission's consideration of the subject amendment has been distributed to all known interested parties.

## **II. STAFF RECOMMENDATION, MOTIONS, AND RESOLUTIONS FOR THE IMPLEMENTATION PLAN/COASTAL ZONING ORDINANCE (IP/CZO) AMENDMENT**

Following public hearing, staff recommends the Commission adopt the following resolutions and findings. The appropriate motion to introduce each resolution and a staff recommendation is provided.

### **A. DENIAL OF THE IMPLEMENTATION PLAN/COASTAL ZONING ORDINANCE AMENDMENT AS SUBMITTED**

#### MOTION I:

**I move that the Commission reject City of Ventura Implementation Plan/Coastal Zoning Ordinance Amendment No. LCP-4-SBV-25-0043-1 as submitted.**

#### STAFF RECOMMENDATION OF REJECTION:

Staff recommends a **YES** vote. Passage of this motion will result in denial of the Implementation Plan/Coastal Zoning Ordinance Amendment as submitted and adoption of the following resolution and findings. The motion passes only by an affirmative vote of a majority of the Commissioners present.

#### RESOLUTION TO DENY AS SUBMITTED:

The Commission hereby **denies** certification of the Implementation Plan/Coastal Zoning Ordinance Amendment No. LCP-4-SBV-25-0043-1 as submitted by the City of Ventura, and adopts the findings set forth below on grounds that the Implementation Plan Amendment, as submitted, does not conform with, and is inadequate to carry out, the provisions of the certified Land Use Plan. Certification of the Implementation Plan amendment would not meet the requirements of the California Environmental Quality Act, as there are feasible alternatives and mitigation measures that would substantially lessen the significant adverse impacts on the environment that will result from certification of the Implementation Plan Amendment as submitted.

## **B. CERTIFICATION OF THE IMPLEMENTATION PLAN/COASTAL ZONING ORDINANCE AMENDMENT IF MODIFIED**

### MOTION II:

**I move that the Commission certify City of Ventura Implementation Plan/Coastal Zoning Ordinance Amendment No. LCP-4-SBV-25-0043-1 if it is modified as suggested in this staff report.**

### STAFF RECOMMENDATION TO CERTIFY WITH SUGGESTED MODIFICATIONS:

Staff recommends a **YES** vote. Passage of this motion will result in certification of the amendment with suggested modifications and adoption of the following resolution and findings. The motion passes only by an affirmative vote of a majority of the Commissioners present.

### RESOLUTION TO CERTIFY WITH SUGGESTED MODIFICATIONS:

The Commission hereby **certifies** the City of Ventura Implementation Plan/Coastal Zoning Ordinance Amendment No. LCP-4-SBV-25-0043-1, if modified as suggested, and adopts the findings set forth below on grounds that the Implementation Plan Amendment with the suggested modifications conforms with, and is adequate to carry out, the provisions of the certified Land Use Plan. Certification of the Implementation Plan Amendment, if modified as suggested, complies with the California Environmental Quality Act, because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the Implementation Plan Amendment on the environment, or 2) there are no further feasible alternatives or mitigation measures that would substantially lessen any significant adverse impacts which the land use plan amendment may have on the environment.

## **III. SUGGESTED MODIFICATIONS**

Staff recommends the Commission certify the proposed IP/CZO amendment, with four (4) suggested modifications as shown below. Existing language of the certified Implementation Plan/Coastal Zoning Ordinance is shown in straight type. Language proposed to be added by the City of Ventura in this amendment is shown underlined. Language proposed to be deleted by the City of Ventura in this amendment is shown as ~~strikethrough~~. Language recommended by Commission staff to be inserted is shown in double underline. Language recommended by Commission staff to be deleted is shown in ~~double strikethrough~~. Other instructional suggested modifications to revise maps or figures are shown in *italics*.

### **Suggested Modification No. 1**

The Coastal Zoning Ordinance (Chapter 24) shall be modified as follows:

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[...]

24. 497 Short-Term Vacation Rentals and Homestays

24.497.010 Applicability

[...]

Chapter 24.497 Short-Term Vacation Rentals and Homestays

Section 24.497.010. Applicability

The development and operational standards for short-term vacation rentals and homestays can be found in the San Buenaventura Municipal Code Chapter 6.455. Chapter 6.455 is part of the certified Implementation Plan, and the standards of that chapter apply to areas located within and outside of the coastal zone.

## **Suggested Modification No. 2**

Added Section 6.455.010 shall be modified as follows:

This chapter is adopted pursuant to the municipal affairs provisions of the City Charter for the purpose of requiring the owner or owners of a residential dwelling unit that is used as a short-term vacation rental or homestay, as defined in this chapter, to apply for and secure a permit authorizing such use in the manner provided for by this chapter. The provisions of this chapter are part of the certified Implementation Plan and apply to all areas of the City, including those within the Coastal Zone.

Added Section 6.455.020 shall be modified as follows:

“Area 1” (“Avenue”) is the area of the city shown in Appendix A. Area 1 is located entirely outside of the Coastal Zone.

[...]

“Area 4” (“Midtown”) is the area of the city shown in Appendix A. Area 4 is located entirely outside of the Coastal Zone.

“Area 5” (“Eastside”) is the area of the city shown in Appendix A. Area 5 is located entirely outside of the Coastal Zone.

## **Suggested Modification No. 3**

The added Section Appendix A map shall be modified as follows:

*The map shall be updated to include the coastal zone boundary and an indication in the legend of which areas are not in the coastal zone.*

The added Section Appendix B map shall be modified as follows:

*The map shall be updated to include the boundary lines around the Pierpont neighborhood zone and add a color to the area along Pierpont Blvd.*

## **Suggested Modification No. 4**

Added Section 6.455.085 shall be modified as follows:

- B. For permittees with more than two permits for short-term vacation rentals located in the city, all permits except two will not be eligible for renewal five years from the effective date of this chapter, except that only one permit will be eligible for renewal in Area 3-A: Pierpont.
- C. For permittees with more than one permit for a short-term vacation rental located in Area 3-A: Pierpont, all permits except one will not be eligible for renewal five years from the effective date of this chapter.

Added Section 6.455.040 shall be modified as follows:

A short-term vacation rental or homestay permit is required for an owner of a short-term vacation rental or homestay to in any form rent, offer to rent, or advertise for rent the short-term vacation rental or homestay as provided in this chapter.

[...]

B. Permit issuance. The permit administrator shall issue or renew a permit authorizing a short-term vacation rental or homestay if the following minimum findings are met:

1. The use of the dwelling unit is within a residential zone pursuant to the city's certified zoning map.

[...]

7. The owner does not have an ownership interest in another dwelling unit permitted as a short-term vacation rental in the city, except as permitted in limited duration by subsections B and C of Section 6.455.085.

Added Section 6.455.030 shall be modified as follows:

The provisions of this chapter shall be administered by the city manager or their designee, the “permit administrator.” The permit administrator shall have the authority to make interpretations and to promulgate administrative policies in order to facilitate orderly administration of this chapter.

Added Section 6.455.020 shall be modified as follows:

The definitions set forth in this section shall govern the meaning and construction of the words and phrases used in this chapter, ~~except where the context of such words and phrases clearly indicates a different meaning or construction.~~

[...]

“Short-term vacation rental” shall mean the use of an entire dwelling unit other than a “dwelling unit” located in a “hotel,” as those terms are defined in Title 24, that is rented to a tenant for a period of not more than 30 consecutive days.

## **IV. FINDINGS FOR DENIAL AS SUBMITTED AND APPROVAL OF THE AMENDMENT, IF MODIFIED AS SUGGESTED**

The following findings support the Commission’s denial of the proposed Implementation Plan/Coastal Zoning Ordinance (IP/CZO) Amendment as submitted and approval of the IP/CZO Amendment if modified as suggested in Section III (Suggested Modifications) above. The Commission hereby finds and declares as follows:

### **A. Amendment Description and Background**

The City of Ventura is requesting an amendment to the Implementation Plan/Coastal Zoning Ordinance (IP/CZO) component of its certified Local Coastal Program (LCP) to add new provisions regulating short-term vacation rentals and homestays, including definitions, development standards, permitting procedures, nuisance response plans, and enforcement provisions.

The City of Ventura has regulated short-term vacation rentals (STVRs) since 2007, when Ordinance No. 2007-014 established the initial permitting framework in Chapter 6.455 of the city’s Municipal Code. The chapter was later amended in 2009 to refine definitions and operational requirements. Over time, particularly in neighborhoods such as Pierpont that have experienced relatively higher concentrations of STVRs, residents have raised concerns about neighborhood nuisances, frequent turnover of visitors, and the potential loss of long-term rental housing, prompting the City to review its STVR program. In 2016 and 2017, the City conducted public workshops to solicit stakeholder input on STVR benefits and impacts, followed by the formation of a stakeholder group to evaluate potential policy approaches. Following this process and subsequent City Council direction, the City updated Chapter 6.455 to update STVR and homestay regulations. On May 23, 2025,

Ordinance No. 2024-009 was adopted, revising definitions, permitting procedures, operational standards, permit caps, and other requirements for both STVRs and homestays. These regulations currently apply in non-Coastal Zone areas of the City. The City has implemented a temporary moratorium on the issuance of new STVR and homestay permits and has suspended acceptance of new applications pending Coastal Commission certification of this amendment. The City's intent is to ensure that the updated regulatory framework, including revised operational standards, permit caps and neighborhood density limitations, and ownership requirements, is applied consistently citywide, including within the Coastal Zone.

Although the City has maintained local regulations for STVRs and homestays through Chapter 6.455 of the Municipal Code, these regulations have never been incorporated into the certified LCP Implementation Plan and therefore do not currently apply in the Coastal Zone. To address this, Ventura City Council approved Resolution No. 2025-18 on March 25, 2025, authorizing the submittal of the subject LCP amendment (**Exhibit 2**). The proposed LCP amendment aims to incorporate the STVR and homestay framework outlined in the updated Chapter 6.455 into the certified Implementation Plan (IP) in order to regulate STVRs and homestays within the Coastal Zone.

The proposed amendment adds a regulatory framework for short-term vacation rentals (STVRs) and homestays to the certified LCP Implementation Plan, based on the City's updated regulations in Chapter 6.455 of the Municipal Code. The amendment provides a permitting framework to regulate these uses in the Coastal Zone consistent with Coastal Act objectives, without changing land use designations or zoning classifications. It establishes definitions, permitting procedures, operational standards, area-based limitations, and enforcement provisions.

The proposed amendment allows STVRs and homestays exclusively in residential zones, where residences are permitted and are regulated consistently with Coastal Act objectives and the City's updated STVR framework. Both STVRs and homestays are subject to ministerial permitting, annual permit renewal, and compliance with Transient Occupancy Tax requirements. The amendment defines *homestays* as short-term rentals in owner-occupied dwellings and *short-term vacation rentals (STVRs)* as the use of an entire dwelling unit, other than a unit located in a "hotel," rented to a tenant for a period of not more than 30 consecutive days. Both STVRs and homestays are allowed in single-family homes, apartments, and condominiums. For multi-unit properties with six or fewer units, only one unit per property may be permitted as an STVR. For properties with seven or more units, a maximum of ten percent of the total units (rounded down to the nearest whole number, with a minimum of one) may obtain STVR permits.

The amendment divides the City's jurisdiction into six distinct neighborhood zones, each with its own STVR permit cap to reflect local conditions and community input. This approach recognizes variations in existing STVR concentrations, housing patterns, and neighborhood character across the city. While homestays are not subject to numerical caps in any neighborhood zone, neighborhood-specific limits do apply to non-owner-occupied STVR permits. Proposed caps include 100 permits in Downtown, 100 in Pierpont, 35 in the Harbor/Keys, 40 in The Avenue, 35 in Midtown, and 45 in the Eastside neighborhood

**(Exhibit 1).** Collectively, these neighborhood caps would authorize up to 355 non-owner-occupied STVR permits citywide. In addition, within the Pierpont neighborhood, STVRs would be limited to no more than ten percent of homes on any given lane **(Exhibit 1)**.

New STVR permits are limited to one permit per owner, with additional provisions addressing the continued eligibility of certain existing STVR permits that exceed newly established ownership or density limits. Phased-in limitations would apply to existing STVRs in the case of those located in Pierpont lanes or multi-unit properties where the number of permits already granted exceed applicable permit limits under the updated provisions, as well as in cases where STVRs are owned by permittees holding more than the allowed number of permits citywide or within the Pierpont neighborhood. Phased non-renewal requirements apply to permits exceeding ownership limits after five years, while certain existing STVRs that exceed density limits may remain eligible for renewal provided they comply with operational requirements and Transient Occupancy Tax obligations.

Minimum stay requirements are included to reduce frequent turnover and associated neighborhood impacts. Owners are required to ensure that all occupants agree to a minimum stay of no less than two nights for STVRs or homestays. The amendment also introduces operational standards that apply to both STVRs and homestays to address parking, occupancy limits, noise, and trash management. Operators are required to maintain a 24-hour nuisance response plan to address complaints. Enforcement provisions allow for the suspension, revocation, or non-renewal of permits for noncompliance with operational standards, failure to remit Transient Occupancy Tax, or unresolved nuisance issues, with annual permit renewal contingent upon verification of compliance.

The City submitted the subject LCP Amendment to the Commission on August 19, 2025 and it was deemed complete and filed by Commission staff on September 4, 2025. Under Section 30517 of the Coastal Act and California Code of Regulations Section 13535(c), the Commission has 60 working days to act on the amendment unless the time period is extended. A time extension request of up to one year was approved by the Commission at its October 8, 2025 hearing. Commission and City staff have coordinated and met to discuss the proposed amendment, and suggested modifications were developed in cooperation with City staff, who have indicated support for these suggested modifications. The full text of the City's proposed changes to the IP/CZO is included as **Exhibit 1** of this report.

## **B. Consistency Analysis**

Pursuant to Sections 30513 and 30514 of the Coastal Act, the standard of review for the proposed amendment to the Implementation Plan/Coastal Zoning Ordinance (IP/CZO) portion of the certified LCP is whether the proposed amendment would be in conformance with, and adequate to carry out, the provisions of the certified Land Use Plan (LUP) component of the certified LCP.

LUP Policy 15.10 of the Resources Element of the Comprehensive Plan states:

*The City shall continue to ensure maximum public access consistent with public safety and fragile coastal resources.*

LUP Land Use Element Policy Regarding Vacation Condominiums and Lower Cost Visitor-Serving Facilities states (in relevant part):

*Visitor-serving facilities, such as lower cost overnight accommodations and restaurants provide an important coastal resource. In order to protect, encourage, and, where feasible, provide these facilities, the City shall:*

*1) Promote the continued operation of existing facilities (including lower-cost motels and restaurants) by not permitting incompatible uses to locate adjacent to such facilities. Specifically, the City shall not permit developments which, based on physical characteristics (e.g., height, open storage) or operational characteristics (e.g., noise, traffic, hours of operation, etc.) would have a deleterious effect on existing visitor-serving uses. [...]*

The City of Ventura LUP includes policies to maintain maximum public access along the coast while protecting public safety and sensitive coastal resources. It also recognizes lower-cost visitor-serving facilities, including overnight accommodations, as an important coastal resource and ensures their continued operation by preventing incompatible development.

The Commission has recognized that short-term vacation rentals and homestays, including those located within residential neighborhoods, can provide an important visitor-serving accommodation. In the City of Ventura, short-term vacation rentals have the potential to expand coastal access opportunities by offering visitors a range of lodging options at varying price points, including accommodations suitable for families and larger groups traveling together. These rentals may provide facilities that allow guests to prepare their own meals, reducing travel costs relative to traditional hotel accommodations, and can serve as a lower-cost alternative to coastal hotels. In addition, short-term vacation rentals may provide the City with increased local revenues through the collection of transient occupancy taxes.

At the same time, the Commission recognizes that short-term vacation rentals can result in adverse impacts if not appropriately regulated, including the loss of long-term and affordable housing, enforcement challenges, changes to residential neighborhood character, and parking and transportation impacts. In prior actions, the Commission has supported and approved local coastal program provisions that regulate the manner in which short-term vacation rentals are implemented in order to minimize these impacts. Such provisions have included, but are not limited to, limits on maximum occupancy, on-site parking requirements, licensing and permit requirements, signage and notice requirements, dispute resolution procedures, and requirements for on-site or local property management. The City of Ventura's proposed STVR ordinance incorporates these types of regulatory tools and further limits the intensity and concentration of STVRs in coastal neighborhoods through neighborhood-specific permit caps and density restrictions and proposes to apply them in a manner that is consistent with approaches previously approved by the Commission in other certified LCPs.

Specifically, the proposed amendment would add definitions for short-term vacation rentals and homestays to the City's LCP and identify these uses as allowable in residential zoning districts

subject to the issuance of an STVR or homestay permit. Under the proposed ordinance, STVR and homestay permits would be issued by the designated permit administrator, and all operational standards and property management requirements would be incorporated as conditions of approval for each permit. Permits would be issued on an annual basis and would be subject to renewal as well as revocation in the event of noncompliance with applicable standards or operating requirements.

The proposed amendment also includes operational standards intended to ensure that short-term vacation rentals do not adversely impact the availability of long-term housing within the City. These standards include limitations on rental duration and ownership restrictions that limit the number of STVRs that may be operated by a single owner. In addition, the ordinance establishes neighborhood-specific permit caps to limit the total number of non-owner-occupied STVRs in each area of the City, while allowing an unlimited number of homestay permits. Proposed caps include 100 permits in Downtown, 100 in Pierpont, 35 in the Harbor/Keys, 40 in The Avenue, 35 in Midtown, and 45 in the Eastside neighborhood (**Exhibit 1**). In Pierpont, additional density limits restrict STVRs to no more than ten percent of homes on a given lane (**Exhibit 1**). Such limitations are intended to prevent the conversion of multiple residential units to visitor-serving use in a manner that could reduce housing opportunities for local residents. In addition, the ordinance would identify certain dwelling units that are ineligible for use as short-term vacation rentals, including accessory dwelling units and units subject to recorded affordability or occupancy restrictions, such as deed-restricted affordable housing units.

To address potential impacts to residential neighborhood character and compatibility with surrounding land uses, the proposed amendment establishes occupancy limits, noise standards, quiet hours, and minimum stay requirements. Overnight occupancy for short-term vacation rentals would be limited to two persons plus two additional persons per bedroom available to occupants, while homestays would be limited to two persons per bedroom. A minimum booking requirement of two nights would also apply to both short-term vacation rentals and homestays to reduce frequent turnover and associated neighborhood impacts. The ordinance also includes on-site parking requirements based on unit size and bedroom count to ensure that short-term rental use does not displace parking that would otherwise be available for coastal access or neighborhood use.

In addition, the proposed amendment establishes a comprehensive property management, complaint response, and enforcement program. Each STVR would be required to post contact information for a designated local property manager, along with a summary of applicable operating standards, including occupancy limits. A responsible party would be required to be available 24 hours per day, seven days per week, to respond to complaints and address any violations in a timely manner. The ordinance also provides for inspection, monitoring, and enforcement mechanisms to ensure ongoing compliance with the adopted standards.

Short-term vacation rentals have existed in Ventura for many years; however, their number and distribution have expanded in recent years, particularly in coastal neighborhoods where demand for visitor accommodations is high. The City's proposed ordinance is intended to address potential adverse impacts associated with STVRs while continuing to allow this visitor-serving use within residential areas of the Coastal Zone. The City's certified Land Use Plan includes policies that protect public access and coastal recreational opportunities and

recognize lower-cost visitor accommodations as an important coastal resource. As proposed, the STVR standards are designed to balance these policy objectives by accommodating visitor-serving lodging while managing potential effects on residential neighborhoods and housing availability.

As described above, the City of Ventura's certified LUP protects visitor-serving accommodations, public access, and coastal recreational resources. The proposed amendment does not prohibit or unduly restrict short-term vacation rentals in a manner that would diminish the public's ability to access and enjoy the coast. Further, the proposed ordinance does not conflict with the priority land uses identified in the LUP, nor does it raise issues with respect to public access or recreation policies. Rather, the proposed amendment certifies a regulatory framework that balances the provision of short-term visitor accommodations with the protection of residential neighborhoods and housing availability. By including neighborhood-specific permit caps and density limits in coastal areas, the ordinance further ensures that STVRs remain compatible with the character of coastal residential neighborhoods. Therefore, the Commission finds that the regulatory framework and restrictions of the STVR ordinance will conform with and be adequate to implement the certified City of Ventura Land Use Plan.

However, as proposed, the short-term vacation rental (STVR) and homestay regulations are contained in Chapter 6.455 of the City of Ventura Municipal Code which is not part of the certified LIP. The City proposes in this LCPA to incorporate Chapter 6.455 into the certified Local Coastal Program (LCP). Notwithstanding this proposal, the text of the STVR ordinance does not indicate that it is part of the LCP. Further, the LIP contains no indication that the outside Chapter 6.455 is part of the LCP. This could result in confusion for the public regarding what provisions comprise the LIP. **Suggested Modifications 1 and 2** serve to clarify for the public that Chapter 6.455 is incorporated into the certified LCP and to confirm that its regulations apply both within and outside the coastal zone, including identification of areas outside the coastal zone. **Suggested Modification 3** further clarifies these provisions through revisions to the two maps included as Appendices A and B. Finally, **Suggested Modification 4** includes minor modifications to the proposed text to ensure consistency with the LCP, further its intent and implementation, and avoid ambiguity. These modifications do not change the meaning or substantive provisions of the amendment.

Therefore, for the reasons discussed above, the Commission finds that only if modified as suggested will the IP/CZO amendment regarding short-term vacation rental and homestay regulations conform with and be adequate to carry out the applicable policies of the certified Land Use Plan.

### **C. California Environmental Quality Act**

Section 21080.9 of the California Public Resources Code—within the California Environmental Quality Act (CEQA)—exempts a local government from the requirement of preparing an environmental impact report (EIR) in connection with its activities and approvals necessary for the preparation and adoption of a local coastal program. Instead, the CEQA responsibilities are assigned to the Coastal Commission; however, the Commission's LCP review and approval program has been found by the Resources Agency

to be functionally equivalent to the EIR process. Thus, under CEQA Section 21080.5, the Commission is relieved of the responsibility to prepare an EIR for each LCP action.

Nevertheless, the Commission is required, in approving an LCP submittal, to find that the approval of the proposed IP, as amended, does conform with CEQA provisions, including the requirement in CEQA section 21080.5(d)(2)(A) that the amended IP will not be approved or adopted as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment. 14 C.C.R. §§ 13542 and 13544.

As discussed above, the City's IP/CZO amendment as originally submitted does not conform with, and is not adequate to carry out, the policies of the Land Use Plan (LUP). The Commission has, therefore, suggested modifications to the proposed IP/CZO to include all feasible measures to ensure that potentially significant environmental impacts of new development are minimized to the maximum extent feasible consistent with the requirements of the Coastal Act and CEQA. For the reasons discussed in this report, the LCP amendment, as suggested to be modified, conforms with and is adequate to carry out the coastal resource protection policies of the certified LUP. These modifications represent the Commission's analysis and thoughtful consideration of all significant environmental issues raised in public comments received, including with regard to potential direct and cumulative impacts of the proposed IP/CZO amendment, as well as potential alternatives to the proposed amendment. As discussed in the preceding sections, the Commission's suggested modifications represent the most environmentally protective alternative to bring the proposed IP/CZO amendment into conformity with the LUP consistent with the requirements of the Coastal Act. Therefore, the Commission finds that the proposed LCP amendment, as suggested to be modified, is consistent with CEQA.