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W13b

LCP-2-PAC-25-0079-2 (City of Pacifica Short-Term Rentals)

August 12, 2026

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CHAIR

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CHAIR

CAUCUSES

BAY AREA CAUCUS
CHAIR

JEWISH CAUCUS
VICE CHAIR

August 8th, 2026

California Coastal Commission
455 Market Street, Suite 300
San Francisco, CA 94105

Re: City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).

Dear Commissioners of the California Coastal Commission,

I am writing to emphasize my support for the City of Pacifica's Short Term Rental LCP Amendment.

I have heard from many of my constituents in Pacifica, as well as City Council and City staff the importance of this amendment. The City of Pacifica has gone through great lengths to make sure that all citizens have had the opportunity to voice their thoughts and opinions on this issue through a great amount of public comment opportunities and outreach. The result has been strong and vocal support of this amendment.

The citizenry has made it clear that this amendment to the LCP is in the best interest of this community who cherishes its status as a coastal community. Pacifica thrives when visitors come and share in the access to the coast and enjoy all that it has to offer. This amendment does not look to inhibit visitors from accessing this vital resource, but to do it in a way that does not impede the lives of residents of this quiet city.

The City of Pacifica has several hotels in the Coastal Zone specifically to serve as a place for folks all over the country and beyond to enjoy the California Coast. The California Coastal Commission has already approved similar ordinances in other coastal cities, some being as close as Half Moon Bay which is just as short a drive down Highway One from Pacifica.

I ask that the Coastal Commission adopt Pacifica's LCP Amendment without further amendment.

Sincerely,

A handwritten signature in blue ink that reads "Josh Becker".

Josh Becker
State Senator, 13th District

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MARC BERMAN
ASSEMBLYMEMBER, TWENTY-THIRD DISTRICT

August 7, 2026

California Coastal Commission
455 Market Street, Suite 300
San Francisco, CA 94105

Re: City of Pacifica LCP Amendment Number 2-PAC-25-0079-2 (Short-Term Rentals)

Dear California Coastal Commissioners:

I respectfully urge the Coastal Commission to certify the City of Pacifica's proposed Local Coastal Program (LCP) Implementation Plan amendments, LCP-2-PAC-25-0079-2, as submitted.

The proposed amendments to the LCP were shaped with extensive local engagement. The City has held numerous public meetings, with substantial resident input, and the City Council has approved the ordinance for areas outside of the coastal zone.

Pacifica residents are increasingly priced out of their community in the housing market. These concerns are addressed in the LCP as submitted, and it addresses neighborhood stability goals. I ask that the Commission approve the City of Pacifica's LCP as submitted, including the primary residency requirement and the 60-night unhosted cap.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "M. Berman".

Marc Berman
Assemblymember, 23rd District
California State Assembly

COUNTY OF SAN MATEO
BOARD OF SUPERVISORS

Ray Mueller
Board of Supervisors, Third District

County Government Center
500 County Center, 5th Floor
Redwood City, CA 94063

July 31, 2026

Re: LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).

Dear California Coastal Commissioners:

I am writing as the San Mateo County Supervisor that represents the City of Pacifica.

I am asking that the Coastal Commission adopt and pass the LCP Amendment for City of Pacifica without amendment.

Pacifica is a proud Coastal community that has a small-town atmosphere. The amendments to the LUP that are being asked for were made with major public participation and many, many public meetings. The City Council has approved this ordinance as is and is supported by many residents of Pacifica. Pacifica and San Mateo County fully supports the goals of the California Coastal Commission but ask that the local resident input and support be considered and ask that the LUP be adopted without amendment.

Thank you for your consideration and efforts for all of California.

Sincerely,



Ray Mueller
County of San Mateo
Supervisor, Third District





California Coastal Commission
North Central Coast District
455 Market Street, Suite 300
San Francisco, CA 94105

**Re: August 12, 2026 Agenda Item W13b. City of Pacifica LCP Amendment No.
LCP-2-PAC-25-0079-2 (Short-Term Rentals)**

Dear Chair Harmon and Commissioners:

On behalf of Airbnb and our hosts in the City of Pacifica, I write to respectfully urge the Commission to certify staff's proposed recommendations to the Local Coastal Plan submitted by the City of Pacifica, by removing the city's primary residency and 60-night cap restrictions. We also ask that the Commission not penalize responsible hosts, and grandfather in existing short-term rentals in multi-family units, protecting those hosts who have invested in good faith and complied with all local regulations.

As submitted, the City's Local Coastal Plan would prohibit the vast majority of short-term rentals in the coastal zone, impacting 95% of all short-term rental night-stays from the previous calendar year. Approving the LCP without the changes noted above would severely impact the cost of accommodations in the region, putting affordable coastal access out of reach for many visitors.

While we appreciate Coastal Commission staff recommending removal of the primary residency requirement and the 60-night cap, prohibiting hosting in multi-family units would still impact accommodations. By the City's own count, this change would affect 37 current listings — 29 of them within the Coastal Zone. Removing these units would unfairly punish hosts who have complied with all existing regulations, which is why we ask, at minimum, that these existing short-term rentals be grandfathered in.

The City of Pacifica has cited affordability concerns as one of its rationale for re-regulating short-term rentals, but the City's own record undercuts that justification. The median home price in Pacifica currently stands at \$1.3 million, which is far from affordable. Yet, the City has permitted only 3.5% of its required very-low-income housing and 5.5% of its required low-income housing units against its 2023–2031 RHNA targets¹. At the same time, Pacifica is considering a proposal to raise property taxes on all its residents in order to close its budget gap, a move that would make housing less affordable for everyone, including current homeowners. Stated simply, Pacifica's own inaction to address affordability concerns undermines its claimed basis for the restricting STRs.

¹ *Pacifica*, Housing Readiness Report, Partnership for the Bay's Future, <https://www.housingreadinessreport.org/pacifica#housing-plans>

Further, as Commission staff pointed out, dedicated short-term rentals in the Coastal Zone make up approximately 0.25% of the housing stock in the City of Pacifica, a portion so small that it would fail to make a meaningful impact on housing affordability, especially when you take into consideration that 2.3% of homes in Pacifica sit vacant and the median price of a home already sits at \$1.3 million². Further restricting STRs would negatively impact coastal access while having no real impact on local affordability, particularly in light of the city's own inaction to actually address the issue.

While the vast majority of hosts are responsible residents who care about their community, Airbnb remains committed to working with the City of Pacifica to address any legitimate nuisance concerns. Over the past two years, we have repeatedly asked the City to identify specific problem listings so we could take action. In that time, the City has reported only one such listing, which we promptly removed from the platform. Despite our continued outreach, the City has not provided any additional listings and instead of engaging further, it moved forward with this restrictive ordinance.

Our hosts in Pacifica provide affordable coastal access to visitors who are not fortunate enough to live there already, directly advancing the Coastal Commission's core mission of keeping California's coastline open and accessible to all. We respectfully urge the Commission not to undermine this mission.

In closing, we want to thank Coastal Commission staff for their work on this LCP and respectfully urge the Commission to:

1. Accept the proposed staff changes and remove the primary residency requirement and the 60-night cap.
2. Grandfather in existing short-term rentals in multi-family units.

Thank you for your consideration.

Sincerely,

Jose Alvarado
Airbnb Public Policy

² *Pacifica, CA Housing Market*, Redfin, <https://www.redfin.com/city/14181/CA/Pacifica/housing-market> (last visited Aug. 7, 2026).



@better_LA
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August 7, 2026

California Coastal Commission
455 Market Street, Suite 300
San Francisco, CA 94105
NorthCentralCoast@coastal.ca.gov
VIA EMAIL

RE: City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals)

Dear Honorable Chair Harmon, Vice Chair Hart, and Commissioners,

Better Neighbors Los Angeles (BNLA) is a coalition of hosts, tenants, housing advocates and community members who conduct data analysis and research on the short-term rental (STR) industry. **BNLA opposes the staff recommendation to remove the primary residency requirement and the 60-night cap on unhosted STRs from Pacifica's Local Coastal Program Amendment (LCPA). We urge the Commission to approve Pacifica's Short-term Rental Ordinance without amendment.** The legislation developed by the city of Pacifica reflects over eight years of community engagement with Pacifica residents and represents a balance between visitor-serving accommodation and the housing needs of coastal communities.

In June 2024, when the Commission last heard Pacifica's LCPA, several Commissioners expressed concern that the city had not taken a stronger position on STRs. Commissioners have repeatedly voiced concerns about STR-driven housing loss, with one even referencing their own displacement due to STRs.¹ Pacifica's LCPA presents a clear opportunity for the Commission to support housing preservation while fully complying with the Coastal Act.

Pacifica's LCPA restricts the operation of unhosted STRs to avoid adverse impacts on housing and protect neighborhood characteristics. The LCPA does not restrict the operation of hosted STRs, which do not displace residents and tend to be more affordable, thus, they fulfill the city's LUP goal of encouraging lower cost overnight accommodations. Removing the primary residency requirement and 60-night annual cap prioritizes the significantly more expensive unhosted STRs over community stability and meaningful coastal access.

LCPA Provisions Are Consistent with Other Coastal Commission Decisions and Direction

The Coastal Commission has consistently upheld primary residence requirements as well as annual caps. In March of 2023, the Commission approved a 60-night annual rental cap for unhosted STRs in the nearby city of Half Moon Bay. In Half Moon Bay, Trinidad, and Del Mar, a

¹ https://cal-span.org/meeting/ccc_20240613/

primary residency requirement for STR operators was also adopted.² These tools are used statewide to mitigate the effects of unchecked STR expansion, including in many of the nearby cities. Disallowing Pacifica to institute a primary residency while neighboring cities have this protection sets Pacifica up to be overwhelmed by STRs, a problem that already exists.

Most important, in the February 2026 Staff Report on Pacifica's LCPA, staff recommended approval of Pacifica's LCPA. At that time, staff found that the proposed IP amendment conforms with and is adequate to carry out the LCP's Land Use Plan. In their rationale, staff emphasized that there exists a "high level of discretion and a wide range of what can be considered reasonable to meet Coastal Act and LCP objectives" and acknowledged the importance of deference for the time intensive local decision making that went into the LCPA.³ Staff recognized that the city of Pacifica drafted their STR regulations in order to minimize the commercialization of residential areas and to safeguard longer term housing opportunities, especially given constraints in the built environment. This current staff report represents a confusing and detrimental reversal in Coastal Commission staff decision-making.

As it did previously, the Commission has the legal authority to balance the conflict between the significant coastal resources using substantial evidence. There is substantial evidence that the City of Pacifica is experiencing a shortage of a significant coastal resource: housing. There is **not** substantial evidence that unhosted STRs provide a source of low cost accommodation. Pointing to the lack of data in a particular area is not evidence. The Commission must look at the data available to it. There is a housing shortage. Short-term rentals, on average, are not more affordable, and take away the significant housing resource. Hotel and motel rooms are less expensive and abundant for a city of Pacifica's size. The evidence has not changed and yet the Commission is changing its recommendations due to the threat of litigation, a threat which is novel as it pertains to STRs in the Coastal Zone, and which could be litigated in either direction.

Unhosted STRs Do Not Provide Low-cost Accommodations

Unhosted STRs do not provide low-cost access to the coast and are more expensive than both hosted STRs and local hotel rooms. This data directly contradicts the assumption that STRs inherently provide affordable coastal access. Historical AirDNA data shows unhosted STRs in Pacifica's Coastal Zone in 2023 averaged \$235 to \$495 per night; while hosted STRs averaged \$117 to \$273.⁴ Meanwhile, comparable Pacifica hotel rooms averaged \$193.⁵ Statewide, less than 10% of unhosted coastal STRs qualify as low-cost under Coastal Commission criteria.⁶ Recent data from Inside Airbnb shows whole home unhosted STRs average \$568 per night while hosted STRs average \$245.

Commissioners and Commission staff often note that whole-home, unhosted STRs, although pricier, can serve as unique accommodations for large groups, thereby reducing cost per

² <https://documents.coastal.ca.gov/assets/la/Commission-STR-LCP-Actions-Table.pdf>

³ <https://documents.coastal.ca.gov/reports/2026/2/W15a/W15a-2-2026-report.pdf>

⁴ https://static1.squarespace.com/static/5fc9845732f65217775cb3a5/t/6995fd4c129fbf0727982d0a/1771437388130/A+Balancing+Act_Low-Cost+Lodging+and+Affordable+Housing+Along+the+California+Coast_pdf.pdf

⁵ Data on file with BNLA. Average daily rate accounts for April 2022-March 2023.

⁶ https://static1.squarespace.com/static/5fc9845732f65217775cb3a5/t/6995fd4c129fbf0727982d0a/1771437388130/A+Balancing+Act_Low-Cost+Lodging+and+Affordable+Housing+Along+the+California+Coast_pdf.pdf

person. However, the Commission never provides any data or evidence to support this assertion. Moreover, 73% of whole home STRs in Pacifica's coastal zone offer only 1 to 2 bedrooms, and 38% provide just one bedroom.⁷ Unhosted listings do not function as affordable group accommodations, while hosted STRs, hotels, motels and hostels more reliably provide affordable access. The chart below breaks down the number of bedrooms for Pacifica Coastal Zone listings.

Pacifica Coastal Zone Unhosted STR Listings <i>Inside Airbnb Data from June 2026</i>	
Bedrooms	Percent of Total
1	38%
2	35%
3	13%
4	7%
5+	7%

Unhosted STRs Harm Affordable and Workforce Housing

Staff's report finds no evidence that unhosted STRs would become available for rent or purchase at an affordable rate if STRs cease (or are prevented from) operating. There is a significant body of research demonstrating that unhosted STRs increase rents and housing costs, that regulations reverse these trends.⁸ By limiting unhosted STRs, the Coastal Commission would make housing more affordable. Pacifica's LUP identifies (low and moderate-income) affordable housing as an important coastal resource and has designed their STR regulations to address overuse and impacts on affordable housing without removing access to the coast.

Pacifica is facing a housing crisis, which makes it all the more concerning that the Commission staff are privileging a small number of unhosted STRs over the coastal resource of housing. For its 6th Cycle Housing Element, Pacifica has been allocated a Regional Housing Needs Assessment (RHNA) goal of 1,892 units.⁹ Three years in, Pacifica lags behind, having only achieved 14% of their RHNA goal.¹⁰ While the city falls behind in housing production, the city leads San Mateo County in homelessness rates, with a 41% jump since 2024 leaving 228 people currently unhoused.¹¹ Housing preservation through STR regulations is key to Pacifica addressing their housing crisis.

The LCPA's primary residency requirement prevents displacement by ensuring that each STR is still used primarily as a home, and the 60-night cap on unhosted STRs prevents continued commercialization of housing in Pacifica. By limiting unhosted STR operations, both these provisions limit neighborhood disruptions and STRs' impact on rents. In Los Angeles, the STR

⁷ Data from June 2026, Inside Airbnb.

⁸ <https://www.rentalscaleup.com/short-term-rental-ordinances-austin-bc-scottsdale/>; <https://onlinelibrary.wiley.com/doi/abs/10.1111/1540-6229.12440>; <https://www.sciencedirect.com/science/article/pii/S0094119021000383>; https://upgo.lab.mcgill.ca/publication/canada-str-rent/wachsmuth_st_hilaire_public_preview.pdf

⁹ <https://www.planpacific.org/housing-element>

¹⁰ <https://www.urbaninsightgroup.com/tools/rhna-tracker>

¹¹ https://www.coastsidenews.com/review/news/pacifica-tops-county-in-homelessness-as-local-count-jumps-41/article_bbd236ac-4ab8-4574-83c3-27764b99ebe4.html

“tipping point,” where an STR provides more rental income than a traditional year-long lease for a tenant, is 62 days.¹² The 60-night annual rental cap in Pacifica ensures the incentive to rent an STR remains on par with long-term renting, in line with Pacifica’s housing goals.

The Impact of the LCPA on Coastal Access is Overstated

Staff’s analysis significantly overstates the LCPA’s impact on coastal access. Staff argues that the primary residency provision will reduce the number of nights available by 50% and the 60-night annual cap on unhosted STRs will reduce the number of nights available by 85%. This analysis ignores the following key facts:

- The 60-night cap **does not** apply to hosted STRs, which represent roughly half of all STRs in the entire city.
- There are 29 unhosted STRs in the coastal zone. The 60-night cap affects only those.
- STR occupancy rates in Pacifica average between 50 and 65%,¹³ meaning that even without the 60-night cap, STRs would not book 365 days a year.
- The Ordinance will not impact the 330 motel and hotel rooms available for visitors.

Environmental Justice Framing is Flawed

Staff’s environmental justice (EJ) framing treats EJ as an argument for maximizing access to luxury, unhosted STRs, an interpretation that is neither supported by the Commission’s Environmental Justice Policy nor reflective of the lived realities of coastal EJ communities. The Commission’s EJ policy is clear: “Coastal development should be inclusive for all who work, live and recreate on California’s coast.” Unhosted STR proliferation removes equitable access for coastal EJ residents whose housing is at risk of conversion into visitor accommodations. The staff report uses the fact that over 60% of California families find a visit to the coast inaccessible as a reason to say that Pacifica’s limit on unhosted STRs will heavily impact lower-income coastal visitors. BNLA argues that Pacifica’s proposed limitations on unhosted STRs encourage hosted STRs, the more affordable and community-compatible option for low-income coastal visitors. The Commission should ensure that coastal access is not secured at the expense of the very communities the Coastal Act is meant to safeguard.

Conclusion

Pacifica’s LCPA balances visitor access with housing preservation. Its regulatory framework is grounded in precedent, and responsibly reconciles visitor-serving needs with the city’s urgent housing challenges. Better Neighbors respectfully urges the Commission to reject the staff recommendation and, instead, approve Pacifica’s Short-term Rental Ordinance without amendment. Should you have any questions, please contact Maura O’Neill at maura@betterneighborsla.org.

Sincerely,

/s/

Randy Renick

¹² https://cityclerk.lacity.org/online/docs/2025/25-0029-s1_rpt_dcp_4-02-26.pdf

¹³ <https://app.airdna.co/data/us/airdna-387/occupancy?lat=0&lng=0&zoom=3>

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August 7, 2026

Via E-mail

Hon. Members of the California Coastal Commission
455 Market Street, Suite 300
San Francisco, CA 94105
NorthCentralCoast@coastal.ca.gov

Re: City of Pacifica LCP Amendment Number 2-PAC-25-0079-2 (Short-Term Rentals)

Dear Honorable Commissioners,

Our law firm represents Better Neighbor Los Angeles, a coalition of hosts, tenants, housing advocates, and community members who conduct data analysis and research on short-term rentals (STRs) and advocate for true home-sharing as the best method to preserve housing and provide affordable coastal access. We write to share with the Commissioners fundamental legal flaws in the Staff Report, and to urge all to vote “no” on Motions 1 and 2.

The Commission’s approval would constitute an abuse of discretion for two reasons: (1) the Staff Report fails to engage in the balancing analysis required by Section 30007.5; and (2) more concerning, the Findings and Declaration misstate the City’s “significant coastal resources,” ignores substantial evidence, and uses the absence of facts as evidence instead of the record before it.

(1) Section 30007.5 of the Coastal Act requires that conflicts be resolved in a manner that, on balance, is the most protective of “significant coastal resources.”

The City of Pacifica’s Land Use Plan (LUP) defines a “sensitive coastal resource area” as “(a) Special marine and land habitat areas, wetlands, lagoons, and estuaries as mapped and designated in Part 4 of the coastal plan; (b) Areas possessing significant recreational value; (c) Highly scenic areas; (d) Archaeological sites referenced in the California Coastline and Recreation Plan or as designated by the State Historic Preservation Officer; **(e) Special communities or**

neighborhoods which are significant visitor destination areas; (f) Areas that provide existing coastal housing or recreational opportunities for low- and moderate income persons; and (g) Areas where divisions of land could substantially impair or restrict coastal access.” (Emphasis added.) Therefore, Section 30007.5 requires the Commission to be more protective of areas described in subsections (a) through (g), which include “[s]pecial communities or neighborhoods” and “[a]reas that provide **existing** coastal housing for persons of low to moderate income, and recreational opportunities **for persons of low to moderate income.**” (Emphasis added.)

The Staff Report repeatedly mischaracterizes the City’s identified coastal resource as “affordable housing,” and misstates the LUP’s goal as “creating more housing,” when the resource is clearly defined as “existing housing” for persons of “low to moderate income.” As a result, the Commission’s findings do not engage in the balancing required by Section 30007.5 because the findings repeatedly misstate the nature of the coastal resources protected by the LUP. For example, the findings state that there is “little evidence showing that the proposed STR regulation in Pacifica would be a significant driver to **create more housing**... [T]here is little evidence that the proposed STR provisions will lead **to affordable housing**, which is the type of housing protected under the LUP, or significantly affect housing availability more broadly.”

In making these findings, the Commission commits an abuse of discretion by explicitly misstating the City’s LUP provisions. The LUP clearly seeks to protect “existing housing” for persons of “low to moderate income” and is not limited to protecting opportunities to create more housing. Moreover, the sensitive coastal resource is not limited to affordable housing, but a more inclusive definition of “existing housing... for persons of low to moderate income.” Since the coastal resources are misidentified, the analysis is inherently flawed, and the Commission has failed to engage in the required balancing of Section 30007.5.

(2) The Findings and Declarations are not based on substantial evidence.

The findings repeatedly ignore the evidence on the record, or worse, use the absence of facts as evidence. First, the finding that the LCPA will not “significantly affect housing availability more broadly” is clearly erroneous. Short-term vacation rentals are converted housing units and thus necessarily impact housing availability more broadly. It is not possible to provide for short-term vacation rentals without a corresponding direct impact on housing. To ignore this reality and reach a contrary finding without substantial evidence is a clear abuse of discretion.

Second, the LUP identifies recreational opportunities for persons of low to moderate income as a sensitive coastal resource. This means that the Commission must favor opportunities that are affordable over opportunities that are not affordable. The Staff Report goes to great lengths to ignore the evidence that short-term rentals cost significant sums of money and are out of reach for most persons of low to moderate income to afford. The findings conspicuously ignore the cost of short-term rentals, which is plainly the best measure to determine affordability. Indeed,

the findings concede that the Commission is not using price to identify whether a short-term rental is affordable:

“[A]lthough the Commission has a long established and long applied methodology for identifying lower cost hotel rooms, it has not developed nor applied a methodology for determining whether any particular STR is lower cost.” Staff Report at 13.

To justify not using the price as the objective measure of affordability, the findings go on to state, without providing any evidence, that short-term rentals are more affordable when shared by families or large groups. This statement has never been supported by data. It is not evidence. Moreover, this supposition would only be applicable to families or larger groups of low to moderate income persons, which is not addressed by the record. The findings must undergo a balancing test that weighs existing housing for persons of low to moderate income against short-term rentals that are affordable for persons of low to moderate income. Despite this mandate, the Staff Report fails to identify short-term rentals that are affordable for persons of low to moderate income and admits that has no such methodology.

In sum, the Commission did not engage in the balancing of interests required by Section 30007.5 because the significant coastal resources were misidentified throughout this report. The findings are not supported by substantial evidence. For these reasons, we request that the Commission vote no on Motions 1 and 2 because the requested modifications described do not conform with, and are not adequate to carry out, the LCP's Land Use Plan.

If you have any questions, please do not hesitate to contact me at ml@ssdslaw.com or (323) 655-4700.

Sincerely,
SCHWARTZ, STEINSAPIR, DOHRMANN
& SOMMERS, LLP

Melanie Luthern
Melanie Luthern

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August 6, 2026

SCOTT EMBLIDGE
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Via Hand Delivery and Email

Hon. Members of the California Coastal Commission
455 Market Street, Suite 300
San Francisco, CA 94105
ExecutiveStaff@coastal.ca.gov

Re: City of Pacifica LCP Amendment Number 2-PAC-25-0079-2 (Short-Term Rentals)

Dear Honorable Members of the California Coastal Commission:

Our firm represents Pacifica Homes Are Not Hotels, a grassroots community group of approximately 200 Pacifica residents. We are very concerned with the about-face reflected in Coastal staff's July 30, 2026, recommendation concerning pending amendments to the City of Pacifica's Local Coastal Program Implementation Plan. On January 15, 2026, your staff sensibly concluded that "the proposed IP amendment conforms with and is adequate to carry out the LCP's Land Use Plan (which is the standard of review for the proposed IP changes)." The Coastal staff also stated: "there is a high level of discretion and a wide range of what can be considered reasonable to meet Coastal Act and LCP objectives. Here, the City's proposal, while clearly not universally supported by its residents (with fervent supporters and opposition on both sides of the debate), has been based on some eight years of local outreach and study, and the Commission has typically given great weight to that sort of process that leads to what might be considered a negotiated outcome."

Now, Coastal staff has reversed course, asking you to carve the heart out of Pacifica's proposed amendments by eliminating the primary residency requirement and 60-night unhosted STR limit. The staff's flip-flop contains many logical flaws, is unsupported by relevant data, and misreads prevailing case law, and deviates from staff's analysis of LCPs in other coastal communities. We urge you to exercise your "high level of discretion" and adopt your staff's January 15 recommendation and find that the proposed IP amendment conforms with and is adequate to carry out the LCP's Land Use Plan.

Less than six months ago, your staff gave the thumbs up to the City of Del Mar's amendment to its LCP. Like Pacifica's LCP, it included a primary residence requirement – "the owner must live in their unit and claim it as their primary residence for more than six months of the year." Staff recommended approval of Del Mar's amendment, stating: "Requiring new STRs to operate only where the owner of the STR lives in their unit for more than six months of the year and considers it their primary residence prevents larger-scale STR operations and maintains residential units for their primary purpose as long-term housing." Staff makes no mention of a potential Commerce Clause problem.

It is mind boggling that Coastal staff recommended approval of Pacifica's LCP in January, recommended approval of Del Mar's amendment in February, but now recommends a complete reversal by this Commission, ignoring not only its earlier recommendations but the policy reasons for those recommendations. It is also troubling that the staff now cites the *South Lake Tahoe* case as a reason for its about-face when the *South Lake Tahoe* case has been on the books for three years and actually explains why a scheme like Pacifica's does not raise Commerce Clause issues.

Background

Pacifica's proposed IP amendment is in large part driven by the well-documented negative impacts of unhosted STRs. As the record before you demonstrates, it is these facilities, often owned by absent property owners and/or corporations driven by profit rather than neighborliness or accessibility, that result in late night and raucous parties, overflowing trash, trespassing on neighboring properties, among others nuisance-creating activities.

These problems are greatly reduced when a STR is hosted and when it is owned or operated by someone connected to and accountable to neighbors and the local community.

Pacifica's LCP addresses these issues by encouraging a connection between the STR operator and the local community, and by limiting the number of unhosted STR stays to 60 nights per year. The LCP places no limit on the number of hosted stays per year because when a host is present, loud parties and other nuisance behavior are unlikely to occur.

Thus, Pacifica preserves access to its coast via hosted STRs, but limits the types of STRs associated with nuisance behavior. This is precisely the type of balanced approach the Commission should applaud rather than criticize.

Allowing Unlimited Hosted Stays Addresses Coastal Access Concerns.

Your staff's report expresses unease with the LCP's restrictions because they could inhibit persons living outside of Pacifica from visiting Pacific and its shoreline. But this concern largely ignores the fact that the Pacifica LCP imposes no restrictions on the number of days per year visitors can stay on a short-term basis in hosted STRs.

Your staff now speculates that "the proposed primary residence requirement has the potential to reduce unhosted rental nights by 50%" but ignores the fact that if demand for local STRs remains constant, it is more than reasonable to expect that any decrease in unhosted STR availability will be made up by an increase in the supply of hosted STRs. In short, there is no data-driven or logical basis for your staff's conclusion – a conclusion missing from its earlier report – that total STRs will be dramatically reduced.

In addition, the staff claims that no data shows how "STR restrictions would create additional longer term housing opportunities." But there is strong anecdotal evidence that the implementation of the cap on unhosted STRs in the non-coastal zone has resulted in up to 19 properties being returned to the housing market, creating more housing opportunities for Pacific's workforce.

Finally, the staff ignores the fact that hosted STRs are likely to be more affordable than corporate-run, unhosted STRs. It is this blind spot in the staff's analysis – the continued availability of hosted STRs – that irrationally skews the staff's conclusions.

Pacifica's LCP Does Not Present a Commerce Clause Issue.

The staff report states: "The primary-residence requirement also raises concerns under the Dormant Commerce Clause of the United States Constitution, where that clause generally prohibits state and local laws from favoring local economic interests over out-of-state interests. By limiting STR permits to people whose primary residence is in Pacifica, the ordinance would exclude nonresident owners, including out of state owners, from operating STRs in the City, inconsistent with the Dormant Commerce Clause. This was affirmed in the *South*

Lake Tahoe Property Owners Group v. City of South Lake Tahoe (2023) 92 Cal.App.5th 735, 759, 767) case, where that court held that an STR exception available only to residents violated the Dormant Commerce Clause. Pacifica's primary residence requirement creates a similar distinction and is therefore vulnerable to successful legal challenge on constitutional grounds."

This is an odd and troubling statement regarding the *South Lake Tahoe* case and other applicable case law because those cases explain why Pacifica's LCP avoids a Commerce Clause issue rather than creates one.

The ordinance at issue in *South Lake Tahoe* banned vacation home rentals in residential zones, but allowed permanent residents to let their dwelling up to 30 days per year. (92 Cal.App.5th at 754.) It defined "permanent resident" as "a person who lives in his or her home a majority of the year and claims a homeowner's property tax exemption." In other words, a California resident of South Lake Tahoe could rent their home, but a Nevada resident living 10 miles away who owned a property in South Lake Tahoe could not rent out their home. The court found that the "ordinance mandates differential treatment of similarly situated in-state and out-of-state economic interests in a way that wrongfully benefits the former and burdens the latter based solely on the latter's out-of-state domicile." (*Id.* at 761.)

The court distinguished other local ordinances that it had previously upheld against Commerce Clause challenges because, unlike the South Lake Tahoe ordinance, the ordinances in those other cases "did not require the primary resident of the home-shared dwelling to be the dwelling's owner." (*Id.* at 762.) In explaining why such an ordinance does not violate the Commerce Clause, the court explained:

For example, the out-of-state owner could rent out the property on a long-term basis with a condition that one of the rooms be used for the owner's short-term rentals. Or the owner could expressly allow the long-term renter to sublet a room on a short-term basis in exchange for paying a higher monthly rent. The ordinance also applies equally to owners who reside in Santa Monica, or elsewhere in California, but at a property separate from their rental property.

(*Id.*)

The same is true for Pacifica's LCP. Someone who owns a property in Pacifica but lives in Texas is treated the same as someone who lives in Pacifica or elsewhere in California. Either can rent out their Pacifica property on a long-term basis to an "Operator" under the Pacifica LCP, who, in turn, could rent out a portion of the property on a short-term basis. This is in sharp contrast to the South Lake Tahoe ordinance, which only let city residents engage in short-term rentals.

In other words, the primary residence requirement advances the strong public policy of having someone local (an "Operator") connected to the short-term rental to minimize the possibility that the rental will be operated in a way that creates a public nuisance. At the same time, it does not discriminate against out-of-state property owners avoiding any Commerce Clause concerns.

Conclusion

We ask the Commission to exercise its discretion to approve Pacifica's LCP, consistent with the staff's January 15 recommendation and the Commission's prior actions, such as its February 5 approval of the City of Del Mar's LCP amendment.

Sincerely,



G. Scott Emblidge

INITIATIVE MEASURE TO BE SUBMITTED DIRECTLY TO THE VOTERS

THE PACIFICA FINANCIAL STABILITY, LOCAL HOUSING, SMALL BUSINESS REVITALIZATION AND AFFORDABLE HEALTHY COASTAL ACCESS ACT

AN ORDINANCE OF THE PEOPLE OF THE CITY OF PACIFICA REPEALING AND REPLACING ARTICLE 49 OF CHAPTER 4 OF TITLE 9 OF THE PACIFICA MUNICIPAL CODE.

THE PEOPLE OF THE CITY OF PACIFICA DO ORDAIN AS FOLLOWS:

SECTION 1. TITLE

This Measure shall be known and may be cited as "The Pacifica Financial Stability, Local Housing, Small Business Revitalization and Affordable Healthy Coastal Access Act."

SECTION 2. FINDINGS AND DECLARATIONS

The People of the City of Pacifica find and declare that:

Findings and Primary Intent

Preservation of Coastal Access. The voters of the City of Pacifica hereby find and declare that short-term rentals provide essential lower-cost visitor and recreational facilities, consistent with the California Coastal Act's mandate of prioritizing public access and visitor serving opportunities and maximizing public recreational access opportunities.

B. Primary Intent. The primary intent of this Initiative is to protect public coastal access and support the local economy by establishing and preserving a targeted maximum of one hundred fifty (150) unhosted short-term rental permits within the Coastal Zone.

C. Essential Visitor and Economic Role. Unhosted short-term rentals are essential for providing both necessary visitor access and Transient Occupancy Tax (TOT) revenue to Pacifica.

D. Affordable Coastal Access. Short-term rentals provide critical "lower-cost" alternatives to hotels. This Act restores workable standards to ensure Pacifica's coast remains accessible to all individuals, families, and groups—across all races, cultures, and socioeconomic backgrounds—consistent with the environmental justice mandates of the California Coastal Act.

E. Financial Stability and Taxpayer Protection. The City's 15% Transient Occupancy Tax (TOT) Short-Term Rental base must be protected from a regulatory collapsing of the

short-term rental program through the addition of excessive restrictions. With the City facing ongoing budget deficits and fiscal uncertainty, maximizing this reliable funding source from tourism is strictly necessary to maintain municipal coastal infrastructure, fund essential public safety services, and prevent the City from imposing new parcel taxes, utility taxes, or sales tax increases on local Pacifica residents to cover operating shortfalls.

F. Uphold Voter Intent. This Act ensures that the will of the Pacifica voters in overwhelmingly passing Proposition M in 2024 is upheld. Proposition M established that the Transient Occupancy Tax (TOT) rate be increased to 15% with the expectation that actual, substantial, collectible revenue from both Short-Term Rentals and hotels would substantially benefit the City's budget, help prevent deficits, and prevent reductions in city services for the benefit of the City, rather than being rendered effectively uncollectible by restrictive regulations.

G. Share the Health. Time in Nature in the Coastal Environment Promotes Health, Wellness, and Environmental Justice. The voters find and declare that access to and time spent in the Coastal Environment provides profound, scientifically validated benefits to human health, psychological recovery, and mental restoration. The coastal climate, natural sunlight, marine fresh air, and recreational opportunities offer an essential refuge to recover from the physical and mental stresses of modern life. Short-term coastal accommodations serve as vital lower-cost visitor-serving infrastructure, providing the necessary space for diverse families, individuals, and socioeconomically burdened or historically marginalized groups to gather, connect, and experience a restorative environment. In alignment with the environmental justice principles of the California Coastal Act, preserving a robust inventory of overnight visitor accommodations ensures equitable access to these active recreational opportunities and environmental health factors. Guaranteeing this overnight access is essential to ensure that the restorative and healing properties of the coast are shared equitably among all populations, regardless of permanent geographic location, income, or background.

H. Respect Historical Land Use Priority. Pacifica's coastal neighborhoods have deep historical roots as visitor destinations, originally developed with amenities including summer cottages and weekend retreats specifically designed to serve visitors, and served by the Ocean Shore Railway. By implementing restrictions that render this important visitor-serving infrastructure economically unviable, the City risks destroying the very economic engine it was built upon and violating historical priorities established by the California Coastal Act.

I. Optimal Visitor Location, Transit Accessibility, and Walkability. The Coastal Zone encompasses the vast majority of Pacifica's visitor-serving amenities and services, including oceanfront open spaces, coastal trails, beaches, restaurants, cafes, and local shops. Furthermore, Pacifica's Coastal Zone represents the closest and most direct coastal access point for major inland population concentrations, including the broader Bay Area, Sacramento, and the foothill region, supported by established freeway

corridors and public transit linkages. Placing visitor accommodations within direct, walkable proximity to the shoreline offers the most sensible land use approach—allowing guests, particularly families with young children, senior citizens, and persons with disabilities, to easily enjoy nature, open space, and coastal views. Concentrating short-term rentals where these amenities exist minimizes driving and traffic congestion, reduces vehicle emissions, and directly supports coastal small businesses while ensuring the coast remains genuinely accessible to the broader regional public.

J. Housing Creation, Aging-in-Place, and Workforce Housing. The City has a need to proactively expand its long-term housing supply. Accessory Dwelling Units (ADUs) represent the most environmentally sustainable method of housing creation, allowing senior residents to downsize and age-in-place, and serving to contribute to affordable workforce housing.

K. Equitable Enforcement. The City requires a unified, evidence-based code enforcement standard that protects all neighborhoods equally from substantial nuisances while affording operators standard procedural due process.

L. Health and Social Opportunity Equity. Access to the coastal environment provides well-documented physiological, psychological, and social benefits. Alongside the respiratory advantages of clean marine air and stress-hormone reduction from watching the waves and taking in ocean vistas, short-term accommodations provide the vital space necessary for families and larger groups to gather, connect, and relax together. Preserving a robust inventory of these visitor accommodations ensures equitable access to these restorative environmental factors and active recreational opportunities—such as sitting or strolling on the beach, surfing, coastal hiking, and biking. These benefits are maximized in the Coastal Zone, and having short-term rentals in the Coastal Zone spreads these benefits widely to those most in need. This guarantees that all populations have the opportunity to optimize systemic health, social well-being, and overall wellness, regardless of their permanent geographic location or economic status.

M. Compliance with California Coastal Commission Directives. The voters find that maintaining an inventory of one hundred fifty (150) short-term rental permits within the Coastal Zone is strictly necessary to comply with the principles, findings, and recommendations of the California Coastal Commission and its staff. Coastal Commission staff reports evaluating local coastal programs have consistently emphasized that overly restrictive local short-term rental regulations result in a severe loss of lower-cost visitor-serving accommodations, violating the core mandates of the California Coastal Act. By establishing a dedicated baseline of 150 coastal permits, this Initiative ensures the City directly aligns with these state-level directives, protects equitable public recreational access, and guarantees compliance with the Coastal Commission's mandate to maximize affordable visitor accommodations.

SECTION 3. STATEMENT OF VOTER INTENT REGARDING GENERAL FUND REVENUE

A. It is the express intent of the voters of the City of Pacifica that Transient Occupancy Tax (TOT) revenues generated by Short-Term Rentals shall continue to be deposited into the City's General Fund. The primary purpose of these funds is to maintain critical municipal services, including police, fire, public works, and municipal coastal infrastructure. By securing this vital tourism revenue, this Initiative expressly intends to resolve ongoing municipal budget deficits and protect local taxpayers from the burden of future local tax increases.

B. Furthermore, recognizing the vital importance of the California Coastal Act, environmental coastal infrastructure resilience, and the need for housing availability, it is the directive and intent of the voters that the City Council should prioritize and allocate a portion of any annual General Fund surplus toward local coastline protection initiatives, coastal infrastructure and resiliency, coastal access improvements, and the creation of affordable housing.

C. This section constitutes a statement of voter policy preference and shall not be construed to legally restrict the use of General Fund revenues, nor shall it convert any general tax into a special tax under California law.

SECTION 4. AMENDMENT TO MUNICIPAL CODE

Article 49 of Chapter 4 of Title 9 of the Pacifica Municipal Code is hereby REPEALED and REPLACED to read as follows:

Article 49. Short-Term Rentals

Sec. 9-4.4900. Geographic Division of Regulations.

To balance coastal access with neighborhood character, Article 49 is divided into three subparts:

- (a) Subpart A (Sec. 9-4.4901 through 9-4.4910): Governs properties within the California Coastal Zone.
- (b) Subpart B (Sec. 9-4.4911 through 9-4.4919): Governs properties outside the California Coastal Zone.
- (c) Subpart C (Sec. 9-4.4920 through 9-4.4923): Establishes City-wide unified enforcement and due process standards applicable to all Short-Term Rentals.

(d) Conflict. In the event of any conflict, inconsistency, or ambiguity between the provisions of Subpart A and Subpart B, the provisions of Subpart A shall prevail and control with respect to any property located within the Coastal Zone.

SUBPART A: COASTAL ZONE ECONOMIC SUSTAINABILITY AND PRESERVATION OF PUBLIC ACCESS STANDARDS

Sec. 9-4.4901. Coastal Purpose and Intent.

The purpose of this Subpart is to maintain a robust and varied inventory of affordable visitor-serving accommodations, prioritizing public access and visitor serving opportunities and maximizing public recreational access opportunities, while generating vital tourism revenue for the City's General Fund to support essential municipal services.

Sec. 9-4.4902. Coastal Permit Allocation Guarantee.

To ensure compliance with Coastal Act mandates for visitor-serving accommodations, the City shall establish a dedicated allocation of exactly one hundred fifty (150) Short-Term Rental permits reserved exclusively for the Coastal Zone. The City shall not artificially reduce this reserved allocation.

Sec. 9-4.4903. Regulatory Purpose.

The purpose of this Subpart is to establish regulations governing the short-term rental of residential property within the Coastal Zone of the City of Pacifica to ensure the health, safety, and welfare of the residents, and to allow for the short-term rental of dwelling units for less than thirty (30) consecutive days, while preventing such activities from becoming a nuisance.

Sec. 9-4.4904. Definitions (Coastal Zone).

For the purposes of this Subpart A, unless otherwise apparent from the context, the following words and phrases are defined as set forth below:

- (a) "Administrator" means the Assistant City Manager or designee.
- (b) "Advertising platform" means any online site that provides a means for the host to advertise or otherwise offer for rent a short-term rental.
- (c) "Operate" means the operation of a short-term rental, and includes the acts of establishing, offering, maintaining, or listing for rent a short-term rental with an advertising platform.
- (d) "Operator" means the property owner, natural person, family trust, limited liability company, or other legal entity that has applied for or been issued a short-term rental permit under this Subpart.

(e) "Permit" or "short-term rental permit" means a permit issued by the City pursuant to this article to allow the use of a dwelling unit property, or portion of it, as a short-term rental.

(f) "Permittee" means a property owner, operator, and/or authorized representative of the property owner, who has been issued a short-term rental permit by the City.

(g) "Rental" means the occupancy or use of a dwelling unit property in exchange for any form of rent that may be valued in money, including cash, credit, goods, labor, or property, regardless of whether such rent is actually received.

(h) "Short-term rental" means the use of a dwelling unit, or portion of it, for a rental of less than thirty (30) consecutive days.

(i) "Short-term rental permit cap" means the maximum number of short-term rental permits that may be issued at any given time by the City within the Coastal Zone.

Sec. 9-4.4905. Short-Term Rental Permit Cap (Coastal Allocation).

The Coastal Zone short-term rental permit maximum capacity shall be one hundred fifty (150) at any given time. The City Administrator shall use best efforts to maintain active permits at the 150 allocation to maximize visitor coastal opportunities and needed Transient Occupancy Tax (TOT) revenue for the City. The Administrator shall not approve applications within the Coastal Zone once the limit of 150 active Coastal Zone permits is reached. The Administrator shall create a waiting list for applications received after the allocation is met.

Sec. 9-4.4906. Multi-Unit Operations and Entity Holdings in the Coastal Zone.

To ensure that the 150 STR cap is supported and generates needed Transient Occupancy Tax (TOT) revenue to the General Fund spread across a variety of dwellings to meet various needs of visitors and supports local neighborhood historic uses, short-term rentals shall be permitted in up to four (4) units per property. Furthermore, nothing in this Subpart shall prohibit a property owner, natural person, family trust, limited liability company, or other legal entity from holding and operating short-term rental permits across separate parcels or distinct legal entities, provided that all participating properties comply with the operational standards of this Subpart and the total active permit count does not exceed the dedicated Coastal Zone allocation cap established in Section 9-4.4905.

Sec. 9-4.4907. Permitted Zones.

Short-term rentals are permitted in all residential zones in the Coastal Zone, subject to compliance with the following requirements:

(a) No person may operate a short-term rental without first obtaining a permit issued pursuant to Section 9-4.4908.

(b) In accordance with Sections 9-4.453(a)(6) and 9-4.454(a)(6) of the Pacifica Municipal Code, no person may operate a short-term rental in any accessory dwelling unit or junior accessory dwelling unit.

(c) Each person operating a short-term rental shall comply with the transient occupancy tax requirements set forth in Chapter 7 of Title 3 of this Code and shall obtain a Transient Occupancy Registration Certificate pursuant to Section 3-7.06.

- (d) Each person operating a short-term rental shall obtain a business license and pay the business license tax required pursuant to Chapter 1 of Title 3 of this Code.
- (e) No person shall operate or allow short-term rental of property in any location not approved for use as a permanent dwelling unit including, but not limited to, any vehicle, trailer, tent, storage shed, or garage.

Sec. 9-4.4908. Permit Application Requirements (Coastal).

Subject to the permit cap specified in Section 9-4.4905, a short-term rental permit along with a short-term rental permit number shall be approved and issued by the Administrator, provided that the Administrator determines the applicant has met the following requirements:

- (a) Application. Any person or entity seeking to operate a short-term rental must complete an application on a form provided by the City. The application form will include, at a minimum, the following information:
 - (i) Name and contact information of the operator;
 - (ii) Name and contact information of the authorized responsible party;
 - (iii) Site plan showing location, dimensions, and use of all existing buildings on the site, and on-site parking;
 - (iv) Floor plan identifying legally permitted bedrooms;
 - (v) Property owner's written consent (if the operator is not the owner);
 - (vi) Advertising platform(s) to be used;
 - (vii) Proof of exterior noise monitor installation;
 - (viii) Proof of commercial or short-term rental liability insurance;
 - (ix) A signed affidavit under penalty of perjury regarding the correctness of the information provided.
- (b) Fees. The permit application shall be accompanied by an application fee established by resolution of the City Council.
- (c) Safety Declaration. The permit application shall be accompanied by a signed safety declaration confirming the presence of operational smoke detectors, carbon monoxide detectors, and fire extinguishers.
- (d) Inspection and Timely Processing. The City may conduct a life, safety, and health inspection of the proposed short-term rental unit prior to issuing a permit. To prevent unreasonable delays, if the City fails to conduct said inspection within twenty-one (21) days of a complete application submission, this inspection requirement shall be deemed satisfied.
- (e) Consent to Inspection. The application shall be accompanied by a consent to inspection form signed by the operator allowing physical inspection upon 48 hours' notice, or production of records within 7 days.
- (f) Compliance. No permit shall be issued if there are outstanding, uncorrected building or safety code violations on the specific property.
- (g) Violation History. No permit shall be issued if the site has received two (2) or more verified citations for a Substantial Nuisance within the prior 12 months, or if the operator has had a permit revoked within the prior 12 months.

(h) Appeals. Decisions regarding the denial of applications may be appealed to an administrative hearing officer.

(i) Registry. All authorized sites shall be listed on a registry published on the City's website.

Sec. 9-4.4909. Permit Term and Renewal.

(a) Term. A short-term rental permit is valid for one (1) year from the date of issuance until October 31 of each year, unless suspended or revoked by the Administrator prior to October 31.

(b) Renewal. The permittee may renew the permit annually, subject to the short-term rental permit cap set forth in Section 9-4.4905, by submitting a renewal application and fee between October 1 and October 31 of each year, regardless of when the short-term rental permit was issued. If a renewal application and fee are not filed prior to the October 31 deadline, the short-term rental permit may be deemed revoked by the Administrator.

Sec. 9-4.4910. Operating Requirements (Coastal Zone Standards).

A short-term rental shall, at all times, be operated subject to the following standards:

(a) Permit required. The short-term rental must be operated under a valid short-term rental permit issued by the City in accordance with this Subpart.

(b) Updates. The operator shall promptly inform the Administrator regarding any changes to application information.

(c) Responsible Party. The operator shall maintain a responsible party available twenty-four (24) hours a day, seven (7) days a week, who must be able to respond in person within sixty (60) minutes to any complaint regarding the condition, operation, or conduct of occupants. The name and contact information of the Responsible Party must be provided to the City and included in the rental materials.

(d) Occupancy. Maximum occupancy limits shall be uniform city-wide. Maximum occupancy shall not exceed two (2) per bedroom, plus two (2) additional guests.

(e) Events and Noise Standards. Consistent with Coastal Act priorities, weddings, commercial offsites, and recreational gatherings are permitted. However, to preserve neighborhood character:

(i) Any gathering that violates the City's Noise Ordinance (Chapter 10 of Title 5) or creates unreasonable noise audible at the property line during Quiet Hours (10:00 p.m. to 7:00 a.m.) is prohibited.

(ii) "Nuisance Parties," defined as any gathering which results in a police citation or the obstruction of public street access, are prohibited.

(f) Noise Monitoring. Each operator shall install and maintain in continuous operation a noise monitoring device on the exterior of the short-term rental. The device shall

monitor noise levels only (decibels) and shall not record conversations. Records shall be retained for thirty (30) days.

(g) Guest Safety & Information. The operator must provide materials regarding safety (diagram of exits, fire extinguisher locations), contact info, and noise regulations to guests electronically and on-site.

(h) Trash. Trash and recycling containers shall be stored out of public view except during scheduled pick-up times.

SUBPART B: NON-COASTAL ZONE NEIGHBORHOOD STANDARDS

Sec. 9-4.4911. Purpose and Intent.

The purpose of this Subpart B is to establish regulations governing the short-term rental of residential property outside of the Coastal Zone to ensure health, safety, and welfare, allowing short-term rentals while preserving residential character.

Sec. 9-4.4912. Definitions (Non-Coastal).

For the purposes of this Subpart B, unless otherwise apparent from the context, the following words and phrases are defined as set forth below:

- (a) "Administrator" means the Assistant City Manager or designee.
- (b) "Advertising platform" means a marketplace in whatever form or format which facilitates short-term rentals through advertising, matchmaking, or any other means.
- (c) "Condominium" means an estate in real property consisting of an undivided interest in common in a portion of a parcel of real property, together with a separate interest in space in a residential, industrial, or commercial building.
- (d) "Events" mean weddings, conferences, retreats, commercial events, loud or disruptive gatherings of any kind, parties or any other similar gatherings which have the potential to cause traffic, parking, noise, or other impacts to the neighborhood.
- (e) "Legally permitted bedroom" means the number of bedrooms that are officially approved for occupancy within a dwelling unit, as reflected in the building permit records of the City of Pacifica.
- (f) "Multi-family development" means a building, or portion thereof, used and designed as a residence for two (2) or more families living independently of each other.
- (g) "Natural person" means a living human being.
- (h) "Noise monitor" means a noise detecting alarm sensor device with a call-assist feature that is located on the exterior of the rental property.
- (i) "Operate" means the operation of a short-term rental, and includes the acts of establishing, offering, maintaining, or listing for rent a short-term rental with an advertising platform.

- (j) "Operator" means the natural person who has applied for a short-term rental permit or has been issued a short-term rental permit by the City.
- (k) "Person" means natural person, corporation, business trust, estate, trust, partnership, limited liability company, association, or other entity.
- (l) "Permit" or "short-term rental permit" means a permit issued by the city pursuant to this article to allow the use of a single short-term rental on a single site.
- (m) "Primary residence" means a residence where a person resides, full-time, for more than six (6) months out of the year. Primary residence shall not include an accessory dwelling unit or a junior accessory dwelling unit.
- (n) "Quiet hours" means the period between 10:00 p.m. and 7:00 a.m.
- (o) "Responsible party" shall mean a natural person, over the age of eighteen (18), who shall be responsible for ensuring compliance with all applicable provisions of the Pacifica Municipal Code.
- (p) "Site" shall mean the assessor's parcel upon which the short-term rental is located.
- (q) "Short-term rental" means the use of a dwelling unit, or portion of it, for a rental of less than thirty (30) consecutive days. A "short-term rental" can be either unhosted or hosted.
- (i) "Hosted short-term rental" means a short-term rental use where a resident, who is the operator and acting as a host, occupies one or more bedrooms in a dwelling unit while other areas of the dwelling unit are rented.
- (ii) "Unhosted short-term rental" means a short-term rental use where no operator is present on the site during the course of the rental.
- (r) "Short-term rental permit cap" means the maximum number of short-term rental permits that may be issued at any given time by the City.
- (s) "Short-term renter" or "guest" means a person who exercises occupancy or is entitled to occupancy for a period of less than thirty (30) consecutive days.
- (t) "Visitor" means a person who is not entitled to occupancy by reason of a booking transaction but is present at the property.

Sec. 9-4.4913. Permits Required for Short-Term Rentals; Permit Cap.

- (a) The short-term rental of residential dwelling units is a prohibited use in every zoning district in the City, with the exception of permitted short-term rentals approved pursuant to the requirements of Subpart A (Coastal) or this Subpart B (Non-Coastal).
- (b) Permit Cap. The maximum number of short-term rental permits that may be issued at any given time for properties governed by this Subpart B shall be thirty-five (35).
- (c) Waitlist. The Administrator shall create and maintain a waiting list when the number of qualified applicants exceeds the available non-coastal allocation.
- (d) Existing Permits and Attrition. If, upon the effective date of this Ordinance, the number of valid, active short-term rental permits in the area governed by this Subpart B exceeds thirty-five (35), all such existing permits may continue to operate and be renewed annually, provided they strictly comply with all operating and renewal requirements of this Subpart. The Administrator shall issue no new permits under this Subpart B until the total number of active permits falls below thirty-five (35) through natural attrition, non-renewal, or revocation.

Sec. 9-4.4914. Standards Applicable to Short-Term Rental Sites (Non-Coastal).

The following standards shall apply to any site offered as a short-term rental under this Subpart B. No short-term rental permit shall be issued if the site is not compliant with the following:

- (a) In accordance with Sections 9-4.453(a)(6) and 9-4.454(a)(6) of the Pacifica Municipal Code, no person may operate a short-term rental in any accessory dwelling unit or junior accessory dwelling unit.
- (b) No person shall operate or allow a short-term rental in any location not approved for use as a permanent dwelling unit (received Certificate of Occupancy or equivalent final inspection), including, but not limited to, any vehicle, trailer, tent, storage shed or garage.
- (c) Primary Residence Requirement: Each operator operating a short-term rental under this Subpart B shall have their primary residence at the site of the short-term rental. To prove primary residency, the operator must provide at least three (3) forms of documentation to the Administrator evidencing that the site is their primary residence for more than six (6) months of the year.
- (d) An operator shall operate only one (1) short-term rental at any given time.
- (e) For a single-family residential unit or a residential condominium dwelling unit, one (1) short-term rental may operate as an accessory use on the site.
- (f) For a multi-family development, only hosted short-term rentals may be operated as an accessory use to an individual unit within the multi-family development.

Sec. 9-4.4915. Short-Term Rental Permit Required.

Subject to the short-term rental permit cap specified in Section 9-4.4913, a short-term rental permit along with a short-term rental permit number may be approved and issued by the Administrator, provided that the Administrator determines the applicant has met the following requirements:

- (a) Application. Any person seeking to operate a short-term rental must complete an application on a form provided by the City. The application form will include, at a minimum, the following information:
 - (i) Name and contact information of the operator;
 - (ii) All adults for whom the property is a permanent residence;
 - (iii) The name and contact information of the authorized responsible party;
 - (iv) Site plan showing location, dimensions, and use of all existing buildings on the site, and on-site parking;
 - (v) Floor plan identifying legally permitted bedrooms;
 - (vi) Property owner's written consent (if operator is not owner);
 - (vii) Documentation of primary residence as required by Section 9-4.4914(c);

- (viii) Identification of hosted vs. unhosted status;
- (ix) Advertising platform(s) used;
- (x) Proof of noise monitor installation;
- (xi) Proof of insurance;
- (xii) A signed affidavit under penalty of perjury regarding the correctness of information.
- (b) Fees. The permit application shall be accompanied by an application fee established by resolution of the City Council.
- (c) Safety Declaration. The permit application shall be accompanied by a signed safety declaration regarding smoke detectors, carbon monoxide detectors, and fire extinguishers.
- (d) Inspection. For short-term rentals, the City shall conduct a life, safety and health inspection of the proposed short-term rental unit prior to issuing a short-term rental permit.
- (e) Consent to inspection. The application shall be accompanied by a consent to inspection form signed by the operator/owner allowing physical inspection upon 48 hours' notice, or production of records within 7 days.
- (f) Compliance. No permit shall be issued if there are outstanding violations on the property.
- (g) Violation history. No permit shall be issued if the site has had two (2) or more violations within the prior 12 months, or if the operator has had a permit revoked within 12 months.
- (h) Waitlist. The Administrator will place the applicant on the non-coastal waiting list established in Section 9-4.4913(c) when the number of active permits has reached the maximum cap of fifty (50).
- (i) Appeals. Decisions regarding applications may be appealed to an administrative hearing officer.
- (j) Registry. All authorized sites shall be listed on a registry published on the City's website.

Sec. 9-4.4916. Operation Requirements (Non-Coastal).

A short-term rental under this Subpart B must comply with the following operation requirements at all times:

- (a) Permit required. The short-term rental must be operated under a valid short-term rental permit.
- (b) Updates. The operator shall promptly inform the Administrator regarding any changes to application information.
- (c) Responsible Party. The operator shall maintain a responsible party available 24/7 who can respond in person within thirty (30) minutes to complaints.
- (d) Guest Information. The operator must provide materials regarding safety, contact info, parking, noise, and trash rules to guests electronically and on-site.
- (e) Advertising. The City-issued permit number must be included in all advertisements.

- (f) Signage. Each site shall display a weatherproof exterior sign (max 2 sq ft) with the permit number, QR code, and contact info.
- (g) Traffic. Usage shall not create detrimental traffic or parking impacts.
- (h) Code Compliance. Usage shall comply with all noise, social host, garbage, and building regulations.
- (i) Laws. Usage shall comply with all state and local laws.
- (j) TOT. Operator shall comply with Transient Occupancy Tax requirements.
- (k) Business License. Operator shall obtain a business license.
- (l) Hosted Presence. The operator of a hosted rental must be on-site between 11:00 p.m. and 6:00 a.m.
- (m) Occupancy. Maximum occupancy limits shall be uniform city-wide. Maximum occupancy shall not exceed two (2) per bedroom, plus two (2) additional guests.
- (n) Visitors. Daytime visitors shall not exceed one-half of the maximum renters allowed; visitor hours are 8:00 a.m. to 10:00 p.m.
- (o) Quiet Hours. 10:00 p.m. to 7:00 a.m. daily.
- (p) Pools/Spas. Use prohibited during quiet hours.
- (q) Amplified Sound. No amplified sound device shall be used outside or be audible from the outside at any time.
- (r) Noise Monitor. Operator shall maintain a continuous noise monitor and retain records for 30 days.
- (s) Parking. At least one (1) off-street parking space per utilized bedroom must be provided.
- (t) Events. No commercial events or non-commercial disruptive events are allowed.
- (u) Trash. Trash/recycling must be managed properly and not constitute a nuisance.
- (v) Unhosted Short-Term Rentals. Unhosted rentals in the Non-Coastal zone are subject to:
 - (i) Maximum 60 nights per year.
 - (ii) Minimum two (2) night stay.
 - (iii) Prohibited in multi-family developments.

Sec. 9-4.4917. Record Keeping.

The operator shall retain records documenting compliance (reservations, TOT payments, length of stay) for three (3) years and provide them to the City within thirty (30) days of a request. Noise monitor readings must be retained for thirty (30) days.

Sec. 9-4.4918. Permit Term and Renewal.

- (a) Term. Valid for one (1) year, expiring October 31.
- (b) Renewal. Must submit renewal application and fee between October 1 and October 31. Late renewals result in expiration. Renewal requires proof of rental nights and compliance verification.

Sec. 9-4.4919. Advertising Platform Responsibilities.

- (a) Platforms shall disclose listing data to the City subject to applicable laws.
- (b) Platforms shall not complete bookings for unpermitted listings.
- (c) Safe harbor applies for platforms complying with (a) and (b).

SUBPART C: CITY-WIDE UNIFIED ENFORCEMENT AND FAIRNESS STANDARDS

Sec. 9-4.4920. City-Wide Enforcement Standards.

To ensure equal protection under the law and guarantee that enforcement is evidence-based and focused on genuine nuisance abatement across all zoning districts:

- (a) Standard of "Substantial Nuisance." A violation shall only constitute a Nuisance if it is substantial, serious, and recurring, and causes actual, material harm to the health, safety, or quiet enjoyment of the surrounding neighborhood. Minor, isolated, or technical paperwork errors shall not constitute a Nuisance.
- (b) Verified Violations Only. No citation shall be issued, and no violation shall be counted toward permit revocation, unless the violation is independently verified and witnessed by a City Code Enforcement Officer, a Police Officer, or supported by objective digital data (e.g., decibel logs). Unsubstantiated third-party complaints shall not constitute a verified violation.
- (c) Opportunity to Cure. For any first-time violation that does not pose an immediate threat to public health or safety, the City shall issue a "Notice of Violation" and provide the operator with a twenty-four (24) hour opportunity to cure the violation before issuing a punitive fine or citation.

Sec. 9-4.4921. Revocation Threshold.

The Administrator may revoke a short-term rental permit city-wide only if one of the following occurs:

- (a) The permit was obtained by fraud;
- (b) The property presents an immediate, severe, and verified threat to public health and safety; or
- (c) The operator has received three (3) or more verified citations for a Substantial Nuisance within a consecutive twelve (12) month period. Any decision to revoke a permit may be appealed to a Hearing Officer. The burden of proof shall be on the City to demonstrate by a preponderance of evidence that revocation is warranted.

Sec. 9-4.4922. Penalties and State Law Compliance.

(a) Administrative Fines. Fines for violations of this Article shall be assessed at the maximum amounts strictly permitted under California Government Code Section 36900, as it currently exists or may be subsequently amended, for violations of local building and safety codes.

(b) Public Nuisance Per Se. Any continuous, unabated violation of this Article that severely impacts neighborhood safety is hereby declared a public nuisance per se.

Sec. 9-4.4923. Administrative Regulations.

The Administrator is authorized to promulgate policies to implement this article, including waitlist management.

SECTION 5. COASTAL HOUSING CATALYST & ADU INCENTIVE PROGRAM

A. Pre-Approved Plans: Within 180 days of the effective date of this Act, the City Planning Department shall research existing California state and local databases of ADU architectural plans to develop and publish a library of no fewer than three (3) pre-approved Accessory Dwelling Unit plans of 750 square feet or less. These plans shall be optimized for Coastal Zone compliance, prioritizing low-profile designs to protect visual resources, and must include at least one plan utilizing Universal Design standards to facilitate Aging-in-Place for senior residents.

B. CDP Waivers: The City shall seek an amendment to the Local Coastal Program (LCP) to allow properties utilizing these specific pre-approved plans to qualify for administrative Coastal Development Permit waivers, where environmentally appropriate.

C. Policy Directive for ADU Subsidies: Recognizing that short-term rental activity impacts local housing availability, it is the express policy directive and intent of the voters that the City Council should utilize General Fund revenues generated by Short-Term Rental Transient Occupancy Taxes (TOT) to subsidize or waive municipal discretionary planning, plan-check, and permit issuance fees for local residents constructing ADUs or Junior ADUs of 750 square feet or less, and to fund the pre-approved plans library.

D. Aging-in-Place Priority: The City Council is encouraged to prioritize fee waivers and municipal grant assistance under this program for senior residents utilizing ADUs to downsize on their own property, allowing them to rent their primary residence to cover healthcare and living expenses while remaining in their community.

E. Legal Status of Allocation Policy: This section constitutes a statement of voter policy preference and guidance to the City Council. It shall not be construed to legally restrict the use of General Fund revenues, nor shall it create a special tax or mandatory dedicated exaction under California law.

SECTION 6. AMENDMENT, REPEAL, AND STATE AGENCY COMPLIANCE

Pursuant to California Elections Code Section 9217, this Ordinance may be amended or repealed only by a vote of the People of the City of Pacifica, with the following strict exceptions:

A. Council Amendment: The City Council may amend this Ordinance unilaterally only if adopted by a four-fifths (4/5) supermajority vote, provided the amendment furthers the purposes of this Ordinance to protect coastal access and financial stability, and does not reduce the 150-permit Coastal allocation established in Section 9-4.4902.

B. Coastal Commission Certification Contingency: Because Subpart A constitutes a local land-use policy within the Coastal Zone, it requires certification by the California Coastal Commission as an amendment to the Local Coastal Program (LCP). If the Coastal Commission requires specific textual modifications to Subpart A as an absolute condition of LCP certification, the City Council is hereby authorized and directed to adopt those required modifications by a simple majority vote, without voter approval. Such modifications shall be strictly limited to those explicitly mandated by the Coastal Commission to achieve certification, ensuring the maximum possible preservation of the voters' intent.

SECTION 7. SUPERSEDING EFFECT AND LEGISLATIVE INTENT

It is the express intent of the voters of the City of Pacifica that the regulations enacted by this Initiative shall supersede and overwrite any prior Short-Term Rental (STR) regulations, zoning codes, or LCP provisions adopted by the City Council or certified by the California Coastal Commission prior to the effective date of this Initiative, including any modifications adopted pursuant to LCP Amendment submittals in 2026. The City Council is expressly prohibited from adopting or maintaining any conflicting LCP provisions.

SECTION 8. IMPLEMENTATION AND COASTAL COMMISSION CERTIFICATION

A. Submission to the Coastal Commission. To the extent that any provision of this Initiative constitutes an amendment to the City of Pacifica's Local Coastal Program (LCP), the City Council is directed to submit such provisions to the California Coastal Commission for certification as soon as practicable following voter approval.

B. Duty to Submit to the Coastal Commission. Within forty-five (45) days of the effective date of this Initiative, or the date of certification of the election results by the City Council pursuant to California Elections Code § 9217, whichever is earlier, the City Council and City staff are hereby directed and mandated to submit this Ordinance to the California Coastal Commission as a proposed amendment to the City of Pacifica Local Coastal Program (LCP) Implementation Plan (IP) pursuant to California Public Resources Code § 30514.

C. Mandate to Execute Modifications Required by CCC. If the California Coastal Commission certifies this LCP amendment subject to suggested modifications, the City Council shall, within ninety (90) days of the Coastal Commission's action, formally adopt such modifications, provided they do not conflict with the core purpose and intent of this Initiative.

D. Limitation on Council Negotiation and Modification Authority. In pursuing certification of this Act with the California Coastal Commission, the City Council's administrative and negotiating authority shall be strictly constrained. The City Council is legally prohibited from accepting, adopting, or agreeing to any Coastal Commission modification that alters, diminishes, or compromises the core quantitative baselines, operational parameters, or structural protections established in Sections 9-4.4902, 9-4.4905, 9-4.4906, and 9-4.4910 of this Act. If the Coastal Commission refuses certification without such modifications, the City Council shall lack the legal authority to unilaterally amend these core terms, and the provisions governing the Coastal Zone shall remain uncertified pursuant to Section 13(A), leaving the independent Non-Coastal Zone regulations fully in effect.

SECTION 9. LIBERAL CONSTRUCTION

This Measure is an exercise of the initiative power of the people of Pacifica to protect coastal access and ensure the financial stability of the City. Its provisions shall be liberally construed to effectuate these purposes.

SECTION 10. SEVERABILITY

If any section, subsection, sentence, clause, or phrase of this Ordinance is for any reason held to be invalid or unconstitutional by the decision of any court of competent

jurisdiction, such decision shall not affect the validity of the remaining portions of this Ordinance. The People of the City of Pacifica hereby declare that they would have adopted this Ordinance, and each section, subsection, sentence, clause, and phrase thereof, irrespective of the fact that any one or more sections, subsections, sentences, clauses, or phrases be declared invalid or unconstitutional.

SECTION 11. LEGAL DEFENSE

The People of the City of Pacifica desire that this Measure be vigorously defended. If the City of Pacifica or any of its officials are a party to any legal action challenging the validity or interpretation of this Measure, the official proponents of this Measure shall have the right to intervene in such action to defend the validity and interpretation of this Measure.

SECTION 12. EFFECTIVE DATE

This Ordinance shall take effect and be in force ten (10) days after the City Council certifies the results of the election at which this Ordinance is approved by a majority of the voters voting on the measure.

SECTION 13. PHASED ENACTMENT AND SEVERABILITY

A. Phased Enactment. The provisions of this Initiative shall take effect immediately upon the certification of the election results for all properties located outside the jurisdiction of the California Coastal Commission. For properties located within the Coastal Zone, the provisions of this Initiative shall take effect immediately upon final certification of the LCP amendment by the California Coastal Commission.

B. Severability. If any section, subsection, sentence, clause, phrase, or provision of this Initiative, or the application thereof to any person or circumstance, is held invalid or unconstitutional by a court of competent jurisdiction, or is rejected by the California Coastal Commission, such decision or rejection shall not affect the validity of the remaining portions of this Initiative. The voters hereby declare that they would have adopted this Initiative and each section, subsection, sentence, clause, phrase, and provision thereof, irrespective of the fact that any one or more sections, subsections, sentences, clauses, phrases, or provisions be declared invalid, unconstitutional, or rejected.

AUG 07 2026

CITY CLERK

NOTICE OF INTENT TO CIRCULATE PETITION

Notice is hereby given by the persons whose names appear hereon of their intention to circulate the petition within the City of Pacifica for the purpose of adopting The Pacifica Financial Stability, Local Housing, Small Business Revitalization and Affordable Healthy Coastal Access Act, an ordinance repealing and replacing Article 49 of Chapter 4 of Title 9 of the Pacifica Municipal Code regarding short-term rentals.

A statement of the reasons of the proposed action as contemplated in the petition is as follows:

The purpose of this initiative is to protect public coastal access, ensure local financial stability, support local housing creation, and small business revitalization in the City of Pacifica. Short-term rentals (STRs) provide essential lower-cost visitor accommodations, fulfilling the California Coastal Act's mandate to prioritize public recreational access.

This measure establishes a cap of 150 unhosted STR permits within the Coastal Zone. This ensures the restorative benefits of the coast remain accessible to diverse families and individuals, regardless of geographic location or income. The Coastal Zone contains Pacifica's primary visitor amenities, making it the most sensible location for visitor accommodations while reducing vehicle emissions and traffic congestion.

Furthermore, this measure protects the City's General Fund. Pacifica relies on the 15% Transient Occupancy Tax (TOT) generated by STRs to fund critical municipal services, including police, fire, and infrastructure. By safeguarding this tourism revenue, this measure helps prevent the need for future parcel taxes, utility taxes, or sales tax increases on residents to cover budget shortfalls.

Outside the Coastal Zone, this measure balances property rights with neighborhood character by allowing up to 35 STR permits exclusively for primary residents. It imposes strict nighttime presence requirements for hosted rentals and limits unhosted rentals to 60 nights per year. To address long-term housing, this measure directs the City to publish pre-approved Accessory Dwelling Unit (ADU) plans and encourages the use of TOT funds to subsidize ADU permit fees, prioritizing senior residents who wish to downsize and age-in-place.

Finally, this measure establishes a fair, city-wide code enforcement standard. It requires verified evidence for violations, provides an opportunity to cure minor issues, and ensures that permits are only revoked for substantial, recurring nuisances—protecting operators' due process rights while keeping neighborhoods safe.

By voting Yes, you support a balanced Pacifica that protects our local economy and supports small businesses, preserves affordable coastal access, secures vital tax revenue without burdening local taxpayers, and maintains the historical fabric of the Coastal Zone.

REQUEST FOR BALLOT TITLE AND SUMMARY Pursuant to California Elections Code § 9203, the undersigned proponents hereby request that a ballot title and summary be prepared for the attached proposed measure.

PROPONENTS:

Har Tan
917 Paseito Terrace
Pacifica CA 94044
8-6-26

Braden Jenkins #2
78 Santa Rosa Ave
Pacifica, CA 94044
8-6-26


Dean Russell Jones
129 Paloma Ave
94044 (435) 901-8772
08/06/26

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: Ringuette, Oceane@Coastal
Subject: FW: NOTICE OF INTENT TO INITIATE CITIZEN-SPONSORED BALLOT MEASURE: "THE PACIFICA FINANCIAL STABILITY, LOCAL HOUSING, SMALL BUSINESS REVITALIZATION AND AFFORDABLE COASTAL ACCESS ACT" — REGARDING AUGUST 12, 2026 COMMISSION MEETING, ITEM W13b / LCP-2-PAC-25-
Date: Friday, August 7, 2026 3:34:09 PM
Attachments: [COASTAL ACCESS INITIATIVE.pdf](#)
[Filed with City 08.07.26.pdf](#)

From: Pacifica for Responsible Tourism <russellj@pacificatourism.org>
Sent: Friday, August 7, 2026 1:33 PM
To: Harmon, Meagan@Coastal <meagan.harmon@coastal.ca.gov>; Hart, Caryl@Coastal <caryl.hart@coastal.ca.gov>; Escalante, Linda@Coastal <linda.escalante@coastal.ca.gov>; Jackson, Raymond@Coastal <Raymond.Jackson@coastal.ca.gov>; Kelley, Ariel@Coastal <Ariel.Kelley@coastal.ca.gov>; Lee, Jaime@Coastal <Jaime.Lee@coastal.ca.gov>; Lopez, Chris@Coastal <Chris.Lopez@coastal.ca.gov>; Lowenberg, Susan@Coastal <Susan.Lowenberg@coastal.ca.gov>; Notthoff, Ann@Coastal <ann.notthoff@coastal.ca.gov>; Preciado, Jose@Coastal <Jose.Preciado@coastal.ca.gov>; Wilson, Mike@Coastal <mike.wilson@coastal.ca.gov>; Vivian Moreno <Vivian.Moreno@coastal.ca.gov>
Cc: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>; ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>
Subject: NOTICE OF INTENT TO INITIATE CITIZEN-SPONSORED BALLOT MEASURE: "THE PACIFICA FINANCIAL STABILITY, LOCAL HOUSING, SMALL BUSINESS REVITALIZATION AND AFFORDABLE COASTAL ACCESS ACT" — REGARDING AUGUST 12, 2026 COMMISSION MEETING, ITEM W13b / LCP-2-PAC-25-0...

Some people who received this message don't often get email from russellj@pacificatourism.org. [Learn why this is important](#)

Dear Chairperson and Honorable Commissioners,

SUBJECT: NOTICE OF INTENT TO INITIATE CITIZEN-SPONSORED BALLOT MEASURE: "THE PACIFICA FINANCIAL STABILITY, LOCAL HOUSING, SMALL BUSINESS REVITALIZATION AND AFFORDABLE COASTAL ACCESS ACT" — REGARDING AUGUST 12, 2026 COMMISSION MEETING, ITEM W13b / LCP-2-PAC-25-0079-2 (PACIFICA SHORT-TERM RENTALS)

Please accept this correspondence as **formal notification to the California Coastal Commission** that the citizens and proponents of Pacifica are officially initiating the process to qualify "The Pacifica Financial Stability, Local Housing, Small Business Revitalization and Affordable Coastal Access Act" for the local ballot, **allowing the voters of Pacifica to directly exercise their constitutional right to vote.**

This notice is submitted specifically in connection with Item W13b / LCP-2-PAC-25-

0079-2 regarding Pacifica Short-Term Rentals, currently scheduled for the Commission's upcoming hearing on August 12, 2026, and we formally request that this letter and its accompanying documents be entered into the official administrative record for this agenda item.

1. Protecting Public Coastal Access and Defending Voter Mandates

This citizen-sponsored initiative directly protects the mandate established by Pacifica voters who overwhelmingly voted to pass Proposition M in 2024.

Proposition M established a 15% Transient Occupancy Tax (TOT) rate with the clear public expectation that actual, substantial, collectible revenue from short-term rentals and hotels would directly benefit the City's budget, prevent operating deficits, and fund vital municipal services and coastal infrastructure resiliency.

The current proposed restrictions on short-term rentals in the Coastal Zone were **initiated by a small, extreme, and vocal minority** who seem determined to **erase Pacifica's rich history of serving and preserving coastal public access**, unreasonably oppose sharing the coast neighborhood with the public, and seem bent on keeping the public benefits the coast bestows to themselves and a privileged few by squashing STRs via restrictive regulations and administrative engineering. This is anti the generous sharing heritage that Pacifica has always been known for. **This heavy-handed intervention serves as a de facto "poison pill" that would drastically reduce both public coastal access and the essential TOT revenue which voters have already overwhelmingly supported** under existing rules.

Furthermore, the measure aligns closely with the core public access principles of the California Coastal Act by preserving a hard short-term rental permit cap of **150 unhosted short-term rentals in the Coastal Zone**, safeguarding affordable, lower-cost accommodations for families and visitors across all backgrounds.

2. Request to Forestall Action and Respect the Democratic Process

In light of this active ballot qualification effort, we strongly request that the Commission forestall making any substantive changes, reductions, or alterations to the City's Local Coastal Program (LCP) short-term rental framework under Item W13b (LCP-2-PAC-25-0079-2) at the August 12, 2026 meeting.

Preempting local action while citizens are actively exercising their initiative power undermines grassroots democracy. The voters of Pacifica deserve the opportunity to weigh in directly on this vital community issue at the ballot box, exactly as they did in 2024.

A complete copy of the filed Notice of Intent and the full text of the proposed initiative are enclosed for your informational records and to be made part of the official record for Item W13b. Please direct any preliminary inquiries regarding this ballot qualification notice to the undersigned.

Respectfully submitted,

The Official Proponents of The Pacifica Financial Stability, Local Housing, Small Business Revitalization and Affordable Coastal Access Act

D. Russell Jones

Pacifica for Responsible Tourism

<http://www.pacificatourism.org>

Tourism Generates Revenue for our City, Keep Pacifica Open for Business



August 7, 2026

California Coastal Commission
North Central Coast District
455 Market Street, Suite 300
San Francisco, CA 94105

Via email to NorthCentralCoast@coastal.ca.gov; Stephanie.Rexing@coastal.ca.gov;
Oceane.Ringuette@coastal.ca.gov; Julian.Honey@coastal.ca.gov

Re: August 12, 2026 Agenda Item W13b. City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short-Term Rentals).

Dear Chair Harmon and Honorable Commissioners:

We write on behalf of Pacifica for Responsible Tourism, whose members own and operate short-term rentals (**STRs**) in the City of Pacifica.

Pacifica's STR hosts provide affordable access to the coast for people who may not otherwise be able to visit, advancing the Coastal Commission's goal of keeping the California coastline broadly accessible. Further, we agree with staff that there is no substantial evidence that STRs detract from long-term housing supply, nor that restricting STRs would create more long-term housing. Municipalities like Pacifica can ensure compatibility between STRs and their neighborhoods through generally applicable operating standards, obviating the need for access-limiting regulations dictating and restricting who is eligible to rent out STRs. Beyond the coastal access issues intrinsic to restrictive STR regulations, many such regulations also expose enacting governmental authorities to litigation. For example, primary residence requirements, the phasing out of existing uses, and regulations limiting people's ability to share their homes with others all give rise to serious constitutional violations.

We support in part the staff's revised recommendation on this LCP amendment. We urge the Commission to adopt both motions: to deny the Implementation Plan amendment as submitted, and to certify it with the suggested modifications that eliminate the unlawful primary-residence requirement and 60-night cap on unhosted STRs. In addition, we ask the Commission to take one further step that the same analysis requires: strike the prohibition on unhosted STRs in multifamily dwellings, which reduces coastal access for the very reasons staff has identified.

The revised recommendation is a welcome change from the analysis that preceded it. As we explained in our comments beginning in 2025, the earlier staff analysis could not be reconciled with the Commission's own 2024 findings or with the certified Land Use Plan (**LUP**). The revised

recommendation more closely aligns with the evidence and the law, and we request that the Commission adopt it while also closing the one gap that remains.

The Commission Should Adopt the Suggested Modifications Striking the Primary-Residence Requirement and the 60-Night Unhosted Cap

Staff correctly concluded that the primary-residence requirement and the unhosted cap provisions cannot be reconciled with the LUP. By staff's own estimate, they would reduce potential unhosted rental nights by roughly 85 percent, from about 55,000 nights to about 9,000, and would make coastal access materially harder for the families, larger groups, and inland and lower-income visitors the LUP is meant to serve. That conclusion follows directly from the Commission's own recent 2024 action, which certified Pacifica's 150-permit cap as "an appropriate balance," found that a cap at roughly 1% of housing stock "is at the lower end" of STR caps statewide, and preserved all existing STRs (LCP-2-PAC-23-0023-1). We applaud the Coastal Commission's continuing commitment to not lowering the 150-permit cap. Pacifica's proposed primary-residence requirement and 60-night cap would undo that balance.

The suggested modifications are necessary to make the amendment consistent with LUP Policies LD-G-1, LD-I-6, PR-I-1, PR-I-2, PR-G-1, and ER-I-41, and with the incorporated Coastal Act access policies. (Pub. Resources Code sections 30210, 30213, & 30222; see *Kracke v. City of Santa Barbara* (2021) 63 Cal.App.5th 1089, 1192-1193, 1197; *Greenfield v. Mandalay Shores Community Assn.* (2018) 21 Cal.App.5th 896, 900 [STR restrictions viewed as "a monetary barrier to the beach"].) Because feasible modifications exist that would substantially lessen the amendment's adverse effects on coastal access, adopting them is also what CEQA requires here.

Striking the Primary-Residence Requirement Removes a Provision Staff Correctly Found Legally Vulnerable

Staff found, and we agree, that the primary-residence requirement is "vulnerable to successful legal challenge" under the Dormant Commerce Clause. (See *South Lake Tahoe Property Owners Group v. City of South Lake Tahoe* (2023) 92 Cal.App.5th 735, 759-767 [resident-only STR preference invalidated].) A primary-residence rule excludes nonresident and out-of-state owners from operating STRs in Pacifica, the same discrimination against interstate commerce that *South Lake Tahoe* found unlawful. The City's housing rationale for the primary-residence requirement is undercut by its own record: Pacifica's owner-occupancy rate is nearly 70%, well above the 40% the Commission recently found sufficient in Encinitas, and the City's implementation of these same rules outside the coastal zone has already cut its STRs by roughly half. Striking the requirement is both compelled by the LUP and the prudent course.

The 60-Night Unhosted Cap Cannot Be Reconciled with the LUP's Maximum-Access Mandate or the Commission's own 2024 decision on Pacifica's prior LCPA

The 60-night cap would convert homes now available to visitors for much of the year into homes available for at most 60 nights, a roughly 85% reduction in unhosted capacity, while creating a binary choice that leaves many units sitting empty rather than converting to housing. As staff found, there is no mechanism and no evidence that this restriction would create long-term housing, let alone affordable long-term housing. What it would most certainly do eliminate homes from overnight accommodations for coastal access: the opposite of the maximization of access the LUP requires.

The Same Analysis Requires Striking the Prohibition on Unhosted STRs in Multifamily Dwellings

One provision that staff would retain cannot be squared with the rest of its own analysis: the prohibition on unhosted STRs in multifamily dwellings, which the ordinance imposes in two places, Section 9-4.4903(f) (allowing only hosted STRs in a multifamily development) and Section 9-4.4905(v)(iii) (prohibiting unhosted STRs in multifamily development units). Staff retained it on the theory that multifamily units are “more affordable by design” housing to be preserved. But that is the very housing-conversion theory staff correctly rejected everywhere else in the report. Staff found no mechanism to compel any STR to convert to long-term housing, no evidence that restricting STRs produces it; and it found that coastal-zone STRs are a fraction of a percent of the City’s housing stock, and that the housing stock is not affordable regardless (median home value about \$1.3 million). Those findings defeat the multifamily prohibition. The record contains no evidence that Pacifica’s multifamily units are affordable housing, and the prohibition applies whether or not they are.

The access cost, by contrast, is large and concentrated. In 2025, the City’s own staff estimated that the multifamily restriction alone would render 37 existing STR units ineligible, 29 of them in the coastal zone. (February 24, 2025 City Council staff report.) Today, any reduction in stock attributable to the multifamily restriction would take place in the context of an already shrinking coastal STR stock; as the Coastal Commission’s own staff report notes, coastal STRs in Pacifica have since dropped precipitously to a total of 41. (July 30, 2026 Coastal Commission staff report.) Multifamily STRs are among the more affordable visitor-serving accommodations, so removing them falls hardest on the families, larger groups, and lower-income and inland visitors whose access the LUP requires the Commission to maximize. That is the same environmental-justice concern staff credited in support of striking the other two provisions. The Ceto Consulting Final Market Analysis already in this proceeding’s record confirms the affordability and central role of Pacifica’s STR stock. Prohibiting unhosted STRs in multifamily dwellings is therefore inconsistent with the same LUP policies (LD-G-1, LD-I-6, PR-I-1, PR-I-2, PR-G-1, and incorporated Coastal Act sections 30210, 30213, and 30222) that require the other two provisions to be struck.¹

¹ We incorporate by reference our prior submissions in this proceeding, including our January 21, 2026 comment letter, our January 26 and January 30, 2026 emails, our April 21, 2026 transmittal of the Ceto

We ask the Commission to strike the multifamily prohibition in full: by adding a suggested modification deleting Section 9-4.4903(f), and by deleting Section 9-4.4905(v)(iii) from Suggested Modification 2. Deleting only one of the two would leave the prohibition intact.

If the Commission is unwilling to strike the multifamily prohibition in full, we ask that the Commission, at a minimum, add a suggested modification allowing *existing* multifamily STRs to continue operating. This would safeguard constitutionally protected vested rights.

Conclusion

We respectfully urge the Commission to (1) adopt Motion 1 and deny the Implementation Plan amendment as submitted, and adopt Motion 2 and certify it with the suggested modifications eliminating the primary-residence requirement and the 60-night unhosted cap; and (2) take the one further step the same analysis requires by striking the prohibition on unhosted STRs in multifamily dwellings.

The result would be an amendment that preserves the 150-permit balance the Commission struck in 2024, retains the City's good-neighbor and enforcement tools, and protects coastal access for all Californians.

Thank you for your consideration of the issues we have raised.

Sincerely,

A handwritten signature in blue ink, appearing to read "Frank P. Angel".

Frank P. Angel
Angel Law

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Subject: California Coastal Commission, Aug 12, 2026, Agenda Item 13b, City of Pacifica, LCP Amendment No. 2-PAC-25-0079-2 (STRs)
Date: Friday, August 7, 2026 12:11:49 PM

RE: City of Pacifica LCP Amendment No. 2-PAC-25-0079-2 (Short Term Rentals)
DENY THE JULY 30, 2026, COASTAL STAFF SUGGESTED MODIFICATIONS to the City of Pacifica LCP regarding Short Term Rentals and **SUPPORT COASTAL STAFF'S JANUARY 15, 2026, recommendation TO APPROVE THE CITY OF PACIFICA'S ORDINANCE AS SUBMITTED.**

Dear Chair Harmon and Coastal Commissioners,

In the Coastal Staff report dated Jan 15, 2026, for the February 6, 2026 California Coastal Commission hearing, it was recommended that the Commission ***"find that the proposed IP amendment, reflecting updates to the City of Pacifica's Short Term Rental regulations, conforms with, and is adequate to carry out the LCPs Land Use Plan, and that the Commission certify it as submitted."*** Inexplicably, with no new relevant data, Coastal staff, in a report dated July 30, 2026, is now making suggested modifications that would negate provisions in the Ordinance voted on unanimously by the Pacifica Planning Commission and Pacifica City Council.

The Coastal Commission has heard and recognized the increasing concerns of coastal communities for many years now. What began as a means to take part in the sharing economy by renting out a room or two in one's own home, has become an investor-driven scheme that has commoditized and commercialized coastal residential neighborhoods to the detriment of long-term housing, residential neighborhoods and coastal character.

Recognizing the need of communities to create regulations to reduce the negative impact of Short Term Rentals (STRs), the Coastal Commission has appropriately looked to local municipalities and counties to find the balance that will best provide coastal access to visitors while preserving long-term residential housing in their area of local control. The City of Pacifica's Short Term Rental Ordinance – already implemented in the approximately two-thirds of the City located outside of the Coastal Zone – is the result of many years of robust public meetings and input, following guidance and approvals by the Coastal Commission both in relation to Pacifica's Ordinance and other coastal jurisdictions.

1. Pacifica's Ordinance is balanced, providing options for coastal visitors and property owners, while preserving residential neighborhoods and character.

- a) Both Hosted and Unhosted STRs can be permitted.
- b) Hosted STRs can be permitted to rent space in a primary residence for an unlimited number of nights annually.
- c) UnHosted STRs, that have removed long-term housing stock, replaced actual neighbors with a revolving door of unknown individuals, and created nuisances throughout Pacifica particularly in the small dense coastal zone, are capped at 60 nights annually.

2. Pacifica's Ordinance addresses the commodification and commercialization of residential neighborhoods through a primary residency requirement.

- a) Pacifica homes are NOT hotels. By requiring a primary residency requirement – the same provision that is in place in neighboring jurisdictions throughout the San Francisco

Peninsula (*see map below*) — and for cities along the California Coast and throughout the State — provides:

- Preservation of existing housing stock and opportunity for long-term housing (both rental and owned).
- Necessary safeguards against commercial investors who purchase homes for the sole purpose of operating a quasi-hotel (without the safeguards of a professional hotel with onsite staff, services, safety and security measures that protect visitors) in residential neighborhoods.
- Assurance that with restrictions in adjacent cities, increased real estate speculation doesn't occur, with the ongoing purchase of residential homes by commercial investors.
- Maintains community, providing space for families who attend local schools and child care, AND, individuals who support all businesses and services (dry cleaners, veterinarians, pharmacies, etc.) on an ongoing basis.
- Quality of Life considerations, as primary residency encourages accountability and minimizes nuisance properties.
- Supports local residents with the opportunity to rent out their own space, without losing the neighborhood feel.

3. Pacifica's Ordinance was shaped over **many years with robust opportunities for public input**. (Primary meetings below, additional meetings may have also been held, and/or public comments received during other public meetings.)

- 1) City of Pacifica Ordinance first adopted the Short Term Rental Ordinance in June 11, 2018
- 2) June 13, 2022 City staff provided an update on the Ordinance, with concerns raised by the public.
- 3) Oct 10, 2022, City Councilmember staff presented additional information; result was direction responding to neighborhood concerns regarding loss of housing, neighbors and nuisances, to impose a 150 Permit Cap. Additional direction for the overall topic to be revisited during (spring) 2023 goal setting.
- 4) January 17, 2023, Planning Commission resolution to approve text amendment (150 permit cap and other good neighbor and administrative items).
- 5) Feb, 27, 2023, City Council, based on recommendation by the Planning Commission (Resolution 2023-001) adopted Ordinance 888-C.S. amending the ordinance, and putting in the Cap and other modifications.
- 6) March 4, 2023. City Council Goal Setting (reaffirmed in 2024, 2025 and 2026 goal setting to maintain the update to the Short Term Rental Ordinance on the City Workplan).
- 7) June 2024, CCC certified the Implementation amendment LCP-2-PAC-23-0023-1. *Coastal Commissioners strongly encouraged the City to return with additional regulations to ensure preservation of housing stock and coastal character. (See transcript of the meeting below.)*
- 8) June 24, 2024
- 9) Aug 26, 2024
- 10) Dec 5, 2024
- 11) January 21, 2025, Planning Commission unanimous passage of resolution to approve text amendments to City Council.
- 12) Additional lengthy City Council meetings held on February 24, and April 14, 2025.
- 13) June 16, 2025, Planning Commission resolution approving additional revisions

resulting from February 24 and April 14, 2025 City Council meetings.

14) City Council approves Ordinance revisions on July 14, 2025.

15) Second reading of revised Ordinance on August 11, 2025.

4. Pacifica Housing Stock and Return of Long-Term Residents/families

- Pacificans outside of the Coastal Zone have already begun to feel the relief in their neighborhoods with families purchasing or entering long term lease agreements in houses that had until last year been short term rentals. To date, online records and neighbor reports indicate 19 unhosted STRs sold and returned to full time housing since passage of Pacifica's Ordinance in August 2025.

- Note: While, as the Coastal staff has noted, the median home price in Pacifica is \$1.25 million, this actually compares to a median price of \$1.5 - \$2 million in other parts of San Mateo County and ranks **Pacifica ranking 16th out of 20 in San Mateo County home prices**, continuing to reflect Pacifica's historic housing marketplace as more affordable than other areas (and why I was able to purchase my home here 30 years ago).

- The argument that coastal communities have not built enough housing over the years (with much of the coast, particularly in Pacifica, **located inside mapped coastal hazard zones**) is not relevant to the need to preserve existing housing, and in fact shows the need to preserve every existing home and affordable apartment.

5. Coastal Staff remarks about the 150 STR Cap as an "appropriate balance" is misleading.

a. Staff Report page 3, para 2, notes: "These changes would continue to reflect the 150 STR Cap that the Commission found was an appropriate balance for Pacifica in 2024..." is misleading at best.

b. In June 2024, Commissioners charged the City of Pacifica with returning with a more robust Ordinance. A transcript of the meeting is provided below.

6. Coastal staff remarks regarding public comments received after publishing January Report

a. Staff Report, page 3, para 3, notes: "...several hundreds of pages received..." after the January report was published.

b. Of the 359 pages of public comment, 250 were duplicative from the same parties, including biased reports provided by industry behemoth, AirBnb.

c. Coastal Commission has consistently defined the need to have the process for STR regulation *be driven by the community*.

It was back in 2022, when I began to raise concerns regarding the loss of my neighbors. Homes previously occupied with neighbors who knew each other by name, were replaced by strangers going in and out every few days. As this continued not only did we lose the community connection, but we began to feel the risk of losing the charm of the area. One public comment submitted (initial correspondence packet page 310, Catherine Burton) states:

"...I always enjoy sharing what I love about Pacifica and seeing others discover the charm of our town. For many of them, Pacifica offers a true retro California beach-town experience that is becoming increasingly rare along the coast."

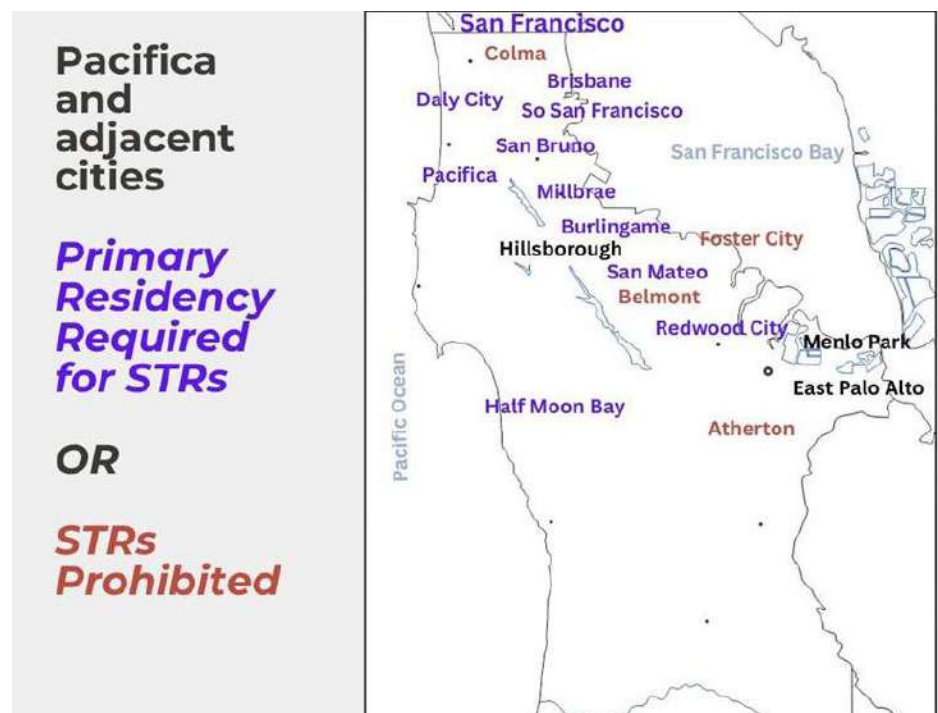
I also enjoy sharing with visitors my love of Pacifica that began 30 years ago, when I moved to West Sharp Park. I can talk about the whales that spout and sometimes breach at the end of

the street, the troops of pelicans that fly by, what I can plant in a garden that is 100% sand, great local shops and restaurants, good hiking trails, cultural locations and the kindness of the community. **It is exactly the “true retro California beach-town” experience, that includes the people who reside here that is at stake.**

Please, approve the City of Pacifica’s well considered Short Term Rental Ordinance as submitted by the City without modifications. By doing so, you will be supporting a balanced approach that has been fully driven and vetted by the local community and as supported by the City’s Local Coastal Program.

Sincerely,

Cindy Abbott
West Sharp Park, Pacifica



Transcription, California Coastal Commission Meeting, June 14, 2023

Item 10a, City of Pacifica Short Term Rental Amendment. *(emphasis for key areas added by commenter)*

Item 10a is a proposed City of Pacifica LCP Amendment, that would modify LCP short term rental or str provisions. Slide one shows Rockway Beach, one of the beaches comprising the city's landscape and a very popular beach and visitor destination.

We have to get the slides up. Slide 2 shows you the area around Beach Boulevard and the pier. Another prime visitor destination in Pacifica. The city has been regulating short-term rentals since 2018 through certified LCP provisions that require compliance primarily in relation to potential use issues such as noise and guest safety and also the collection of transient occupancy. tax or TOT. The proposed new short-term rental provisions would establish a cap of 150 STRs in

the city, which would end up being about 1% of the city's housing stock. Additionally, the new provisions would prohibit STR use in junior accessory dwelling units. and would establish new permitting provisions such as annual renewal requirements, enforcement procedures and a wait list.

Short to rentals in the city have changed between 100 to 150 units in the last few years throughout the city. And thus the proposed cap essentially accommodates STRs in good standing, but would limit future STRs. Next slide, please.

The land use plan, which is the standard of review for this proposal encourages visitor serving facilities provided that adequate services are available and offsite impacts are minimized and the proposal meets those tests. Importantly, the city considers this a first step to regulate the number of short-term rentals in order to accommodate a balance between visitor and housing needs. And the current proposal appropriately reflects that. Additionally, the city next plans to continue their local process, including through City Council study sessions and workshops to work with city residents to determine any further regulations on STRs that might be appropriate, with the 150 cap acting and the first step in regulating the amount of short-term rentals in the city. During this continued local process, further regulations in line with any feedback or concerns received pursuant to this first step will be considered by the city and any local decision would be brought back to the commission for certification. Thus, (CCC) Staff recommends that the Commission approve that proposed amendment as submitted. The one motion necessary to do so can be found on page four of the staff report. This concludes staffs. presentation.

Chair Hart: Thank you. Okay great thank you very much. All right are there any exparte on this? Right we'll open the public hearing asking for public comment.

CCC Staff: Yes, we have one person in person, Stephanie Cervantes from the Community Development Office, Pacifica. And, then we have three more on Zoom.

Stephanie Cervantes: Honorable Chair and Commissioners, my name's Stephanie Cervantes. I'm interim Deputy Director and I'm also joined today by Yulia Carter, Assistant City Manager, and we are here to present the City of Pacifica's LCPA for the short-term rental program. Slide.

The City began regulating SDR in 2018 with the good neighbor policies, and since than additional issues and concerns have been identified, which led to this amendment, which was locally approved in 2023. Next.

As mentioned in the report, the LCPA includes some essential provisions to the cities STRs regulations, including establishment of the short-term rental cap to 150 units, establishes a waiting list for applications if and when the cap is reached, and I just want to highlight that the city does require one STR permit per unit. It also includes STR, (excuse me) **excludes** STRs from junior accessory dwelling units and any other location not approved to be used as a permanent dwelling unit. The ordinance also establishes the term for expiration and requires

renewal on October 31st of each year, and revokes the permit if the permittee fails to renew. Next.

The city adopted these changes after public participation starting in the summer of 2022. The city council determined a citywide cap of 150 permits as a consideration item at the regular meeting on October 10, 2022. At that meeting, the City Council deliberated on various methods to impose the Cap before deciding that a citywide Cap instead of any other type of Cap would be the best fit the most straightforward and manageable way for the city to enforce a Cap. At that time **the Cap was established as a near term policy option** that staff could reasonably implement with the existing resources and without altering other key work plan items and council priorities. **A more comprehensive update to the short term rental ordinance is on the city council strategic plan and it is a priority item** for the city and work is set to begin this summer. The City Council recently directed staff to allocate funds to that effort. Slide.

We appreciate the commission hearing this item today. And, we want to emphasize the importance of certifying the cap now. This will allow the city to focus on the upcoming SDR ordinance update on other important issues and concerns raised by the council and by the community. This does conclude our presentation. Thank you.

Chair Hart: All right, great. Thank you very much. May I have the Zoom speakers now.

CCC Staff: Yes. that we have Noah Suarez likes from Better Neighbors LA. All right.

Noah Suarez Sikes: All Righty. Good morning, my name is Noah Suarez Sikes, and I'm an organizer of Better Neighbors LA, a Coalition of, hosts, tenants, housing activists, and community members. We conduct data analysis and research on the impact of the short term rentals industry throughout the coastal zone and its impact on affordable coastal access and housing.

So, we believe true home sharing and hosted only short term rentals is the best way to balance housing accessibility and affordable access to the coast for visitors. But as submitted the modest 150 STR Cap in Pacifica's LCPA will not adequately safeguard long-term residents for the impacts of unhosted short-term rentals. Nor ensure affordable coastal access for visitors. We request the Commission strengthen this LCPA to include policies approved by this Commission and other jurisdictions. The definition of unhosted and hosted STRs; a primary residence requirement for the host; a limit of one short-term rental permit per natural person; and a sixty night cap on the number of nights an unhosted STR can be operated annually.

We've growth of the Pacifica short-term rental market illustrates the corporatization of housing for luxury tourist serving accommodations at the cost of available housing options for long-term residents. Between May 2017 and March 23, the number of on hosted STRs more than doubled from 67 in May 2017 to 173 in March 2023. Meanwhile, the average on hosted STRs and in the Pacifica coastal zone cost between \$235 a night, to \$435 a night, whereas the

average price but comparable hotel room in one of the Pacifica's seven hotels is approximately \$193 a night.

And so because the LCPA as submitted will not adequately protect existing housing stock, nor necessarily provide low cost overnight accommodations for visitors for these reasons, we request that the Commission strengthen the Pacifica LCPA, again to include a definition of unhosted STR's, a primary residency requirement, limit of one short-term rental for natural person and a 60 day cap on the number of nights an unhosted short-term rental may be operated annually. Thank you very much.

CCC staff: Thank you, our next speaker is Lyla Raynero. Lyla, you're in as a panelist. You're able to unmute yourself.

Lyla Reinero: Hi, my name is Lyla Reinero. I'm a concerned citizen of Pacifica residing in the coastal zone in Pedro. I echo just about everything that the previous speaker said from Better Neighbors LA. We moved to Pacifica because we love the neighborhood and it's family-friendly vibe. In 2019, the house across the street from us was purchased by a corporation that turned into a full-time STR. And the loss of homes for full-time residents has many negative consequences, including, but not limited to, population decline, the loss of families, which means the loss of children in our school systems, the loss of funding for services, including the police, the inflation of housing prices that shuts families out from the market, rising rents lead to minimal housing available for long-term renters. And... The devastating drop in the value of homes for those living next to out of control STRs and there's also this strain that's put on the water and other resources for homes that would normally house three to four people and are now regularly hosting party houses up to 16 people. We just don't have the infrastructure with the current sewage situation.

We also have the degradation of security and community and the loss of our neighborhood's character. And, a case in point to the safety issue, recently, our neighbors just to the south of us in Montara, faced an issue last weekend when an unhosted SDR house party got out of control, resulting in multiple arrests of felons in possession of fire arms.

We have no issues with our neighbors who occasionally rent out their homes for supplemental income. We live next to a retired teacher who rents out his house semi-regularly and there's never been an issue with that. It's the out of town operators and corporations that need to go. Residents of the Pacifica are looking to the CCC to help us in supporting a much improved STR ordinance similar to our sister city in Half Moon Bay. Thank you for your time.

CCC Staff: Thank you. And then we had one more speaker who was briefly in the meeting as Kevin Woodhouse and we aren't able to find him anymore. Giving it one last look. Kevin Woodhouse if you're in the meeting please raise your hand.

Stephanie Cervantes: Chair, Kevin Woodhouse is our city manager, he was unable to join the meeting.

Chair Hart: All right, but you spoke for the city.

CCC Staff: No more speakers for this item. Okay. All right, I'll bring it back to staff.

CCC staff (Dan Carl): Just quickly, I think it's important to think about this in terms of phasing. This is like phase one of a multi-phase project that the city is going through. As you heard, they're going to be going into phase two and trying to think about some of these changes that folks are asking about. And so we felt that this was a good first start. And, let that process play out there, they went through a multi year process to get to this point. These things take a long time and so that was just the one thing I would note for you guys.

Chair Hart: All right, great. So I'll bring it back to the commission for any comments or questions.

Commissioner Gretchen Newsom (Alternate for Notthoff): Yes, Thank you. I serve as an alternate commissioner, so it's rare that you get to see me because Commissioner Notthoff is always serving. But, I am one of the commissioners that was displaced by a short term vacation rental from my long term rental in Ocean Beach, San Diego, that I lived in with my son, and they eventually, sold it in hopes of turning it over into a short term vacation rental. And, where I currently live, there are 10 houses on a dead end block, three of which are short term vacation rentals by corporations that have a high propensity of turnover and are not abiding by a good neighbor kind of practice. So this is an issue that is very concerning to me.

I would like to know from staff, if you could respond to the recommendations made by Better Neighborhoods Los Angeles, primarily I'd say to find that a primary residency requirement for the host be implemented and also limiting one short-term vacation per natural person. If you have thoughts of how that could be implemented. And I did just visit the city of Pacifica on Monday, which is located near my hometown of Loma Mar in Pescadero and Half Moon Bay.

When you say that they're entering into the first phase of implementing this, what does that timeline look like for making considerations of the next phase?

CCC Staff: The city could probably speak better to the timeline of that. I know they're starting this summer. But some of the requests are things that this commission approved in other communities. Every community is different. And so this is part of the difficulty of kind of like a cookie cutter approach to short-term rentals. Every community has their own way that they want to do it. **We've seen primary residency requirements. We've definitely seen the one short term rental per natural person getting away from the corporatization.**

Those are all things, I'm sure they're going to consider. I won't put words in your mouth Ms. Cervantes. That's the next step, right? So we're very familiar with those kind of things and we can provide them with some information from other communities and what they've done. There have been folks who have mentioned Half Moon Bay that was one that went through two years ago maybe now that I think that was quite restrictive. And a lot of, a lot of folks who are, you know, not supportive of short term rentals, point to Half Moon Bay in that

regard. So I think that all of those things will be on the table.

Commissioner Newsom: Can I hear from the city? Thanks.

Stephanie Cervantes: Yes, thank you. So we are tentatively scheduled right now, actually it is scheduled for June 24th will be our study session kickoff, so that is occurring in less than two weeks. That will be our kick off for Phase 2. We have a presentation and study session to City Council and we are advertising that currently for the public to join that on that study session. And really with that study session is, is to identify, **we have a long list of the issues we want to really get to identifying possible solutions and get policy direction from the council at that meeting, in order** for staff to be able to draft that ordinance and come back later this year.

Chair Hart: All right. Any other questions, commissioners?

Commissioner Cummings: Thank you Chair. I had a question for the city. I'm just kind of curious. You know, when it's captive 1% rather than an actual number, what that means is that as more housing is produced over time, that leads to the potential for an increase in more short time rental. So I'm just kind of wondering if you can just speak to that and kind of where the, maybe the city council is coming from on that.

Stephanie Cervantes: Yes, thank you for the question. So I just want to correct the cap is 150 units. That's just roughly one percent of our current housing stock.

Commissioner Cummings: Got it, that's helpful because I was just concerned with the fact that with all the housing mandates, if we built more housing than that, if it was the 1% it could lead to more short term rentals.

Stephanie Cervantes: Yes, of course but it's capped at 150. Thank you.

Chair Hart: Great any other questions? We have Commissioner Wilson then Commissioner Rice. Thank you so much. Commissioner Rice, excuse me, first and then Commissioner Wilson.

Commissioner Rice: Very quick question on that on that 150. Does it discriminate between being coastal zone and city.

Stephanie Cervantes: Thank you. That is a city wide cap. We don't have a distinction between coastal zone and non-coastal.

Commissioner Rice: Okay and right now if I read correctly there's 44 in the coastal zone.

Stephanie Cervantes: Yes, that number does fluctuate on almost a monthly basis, but that's the most recent data that we have is that number.

Commissioner Rice: Okay, and is that one of the things that you may be considering in your workshop is actually discriminating between the cap in the coastal zone versus the city.

Stephanie Cervantes: As our right now staff does not have any sort of agenda what the city council will be considering. All policy options on the table.

Commissioner Rice: Okay, thank you.

Chair Hart: Commissioner Wilson, Okay, sorry about that.

Commissioner Wilson: That's all right. I'm used to it. So first of all, **so I guess what I'm hearing is this is kind of like a moratorium, is that how you guys are viewing this? Is this like a moratorium until you actually create a better policy for short-term rentals?** I know my county <<Humboldt>> and I think Marin County and other county's did basically a moratorium on new applications until you get your ordinance done and that way, it was very helpful to motivate, you know, like, have a cutoff. So is that what you guys are trying to do here?

Stephanie Cervantes: Thank you. No, our cap of 150 is intended to stay. We are currently not at that number. We are accepting new STR applications currently. The cap is, once we reach that cap, it will just be no new STR permits will be issued. We will have a wait list if any of the existing STRs drop off, so we'll be able to go to that wait list to gather more.

Phase two is really more intended to work on the operational issues that come up with STRs

Commissioner Wilson: In that when you call it phase two, then you could in the future lower that cap and lose them by attrition.

Stephanie Cervantes: We could if the city council goes that direction.

Commissioner Wilson: Okay, then do you know what your vacancy rate is currently in, in Pacifica?

Yulia Carter (responding from the audience): 16%.

Commissioner Wilson: Okay, because you know, because the, your short term rentals are now basically adding to the vacancy rate. **So, okay, so I get where you're coming from here and personally I would prefer that this was to like a moratorium while you get your new ordinance dealt with and you actually analyze this number of which means approximately 1%, 150 is still impactful.**

I also live in a neighborhood that's been impacted by short term rentals and it's impacted the number of kids in my neighborhood and the number of families and all that, all that stuff.

So are you guys planning on doing any... What's your enforcement? Sounds like you have an enforcement issue. And I'm wondering, are you guys going to be charging or do you charge fees like annual fees in order to support your enforcement of the regulations that you will have to this, because what we found in some jurisdictions is that there's no enforcement, because there's no fee structure.

Yulia Carter: Yes...

Chair Hart: Hi, could you state your name please?

Yulia Carter: Absolutely. Yulia Carter, Assistant City Manager City of Pacifica.

Thank you so much for your questions.

So we do contract with HDL for tax liability enforcement and we've recently, actually last year we created the local enforcement program for STRs. So we do charge, in addition to TOT, we do charge the STR permit fees that help with the enforcement specifically for the STRs and creating this cap actually making it more manageable for us to address the issues. As Ms. Cervantes said, so once the non-compliant STRs drop off, we will have more compliance. by enforcing the cap right? So we'll be actually enforcing good operators to operate STRs in the city.

Commissioner Wilson: And have you had people's licenses revoked due to operations that were non-compatible?

Yulia Carter: Not yet, but we did issue NOVs <<notice of violations>>, so we are actually in the process of doing some legal enforcement on some of the bad players in the community. So this is actually going to be a part of this community discussion on the 24th. And once we reach the cap, again, this will be much more manageable process to address, because they will be no more room for them to get back in the way.

Commissioner Wilson: And, do you anticipate... one of the suggestions, and we see commonly as hosted versus un-hosted in terms of the definitions, do you think you will have an indepth discussion with your community about hosted and unhosted? And, do you think that that will expand that cap or will that cap hold solid? What's your expectation?

Yulia Carter: Well, I can't speak for the city council as far as what the policy will look like, but I'm pretty much sure that they will be robust discussion on the hosted versus unhosted because we already get some of the feedback and some questions from the community related to that.

Commissioner Wilson: Okay. Okay, because it's furthering this discussion, I will say, as you probably read in the report, if this had come to this commission maybe five or six years ago, there'd be a kind of a different discussion, but **we've just really seen it a massive experiment in this commercialization and commodification of our housing stock.** And so basically as you were creating commercial enterprises across our housing stock, and if you could imagine taking a neighborhood of 150 homes in your city and saying, you know what we're gonna do? We're gonna convert that into a hotel. Like you would have uprising. People would lose their minds about that, right? So what we're doing is we're just kind of dispersing that across the community and then saying, well, we're not, we're dispersing that impact across, **but still on my housing perspective and an impact perspective, it's still there, still real.**

So the suggestions made by <<Better Neighbors>> LA, what they're called... the letter that came in, I think that those are actually very strong suggestions that I would hear them. And I'm sure you guys are going to look at it, a matrix of options in regards to short term rentals, because you're talking about both the positive parts that are the positive and the negative parts of this and it's both housing and it's impacts to communities. **But then also there's**

potential and what they're speaking to in this correspondence is for people who live in the house itself and are sharing that is a much less impactful a way to apply this way of doing accommodation in your community. I'm done lecturing you, I apologize for that.

So I just want to put out that that you're giving it to us in the sort of bite-sized chunk but when it comes back it will be a more of an analysis. This commission and this agency probably has reviewed more short-term rental ordinances than any agency on the planet. Right, really. Yeah, because other jurisdictions, we're just doing our own right one at a time, tink, tink, tink, we're actually analyzing a plethora of these and I don't know any other jurisdiction that does that sort of analysis. And so we're on that journey with everybody, where we're constantly evaluating that data as it comes in. And so that's why staff has more and more information and more and more input for the staff from the commission on sort of like how this impacts our coast. And so thank you for hearing that.

Yulia Carter: No, thank you so much. It just went to like five seconds over your time. **So this is extremely important, extremely complex subject and we completely understand the complexities that go with this. So this is why it was so important for us to be here in person, to hear your feedback and hear your expertise and the public comments that we received.**

So all of this policy discussions, at the end of the day, we want to be on the same page, we want to create a program that works. **Works for the neighbors, works for community, works for the economy and find this perfect balance.** So I completely hear what you comments and appreciate them.

Commissioner Wilson: **Yeah, and as much as we hear about housing and building more housing, when you talk about 150 units, preservation of existing housing is just as important in that equation.** And I'm going to be hoping that those groups across the state that are pushing very hard for these housing policies are also address issue of print preservation housing. There's currently quite silent on so we'll be there with you. Thanks.

Yulia Carter: Thank you so much.

Chair Hart: Great. Thank you so much. Commissioner Aguirre.

Commissioner Aguirre: Thank you. I want to associate myself with the comments that Commissioner Wilson just made and also with some other recommendations that the letter suggested. Just quickly, **can you just elaborate a little bit further on the rationale** between the permit versus the individual permits that you all decided on, **because I appreciate the openness of having wanting to host forums and receive feedback, but to Commissioner Newsom's point that, you know, that may displace people in between now and when the council adopts a new ordinance based on a lot of feedback.** We're looking at two, three years, maybe down the line. So can you just explain a little bit the rationale behind the original concept?

Stephanie Cervantes: Thank you. I just want to make sure I understand the

question. Are you asking to clarify how we came up with 150 cap instead of the 150 permits versus 150 units.

Commissioner Aguirre: Yes

Stephanie Cervantes: So the city does require that each unit receive an individual permit. So if a property has a duplex, they are required to STR permits one for each unit. So when we say STR permit or STR unit, it's the same.

So it's 150 units through the city, 150 STRs, citywide. That's the cap. And the rationale for that number, as I mentioned during my presentation, during that October 2022 meeting, the City Council did look at a variety of different ways to cap and they considered a different number. They considered 100. They considered 175. And at the end of the day, they kind of decided on this 150 number. That would allow the STRs that were currently on the books as good actors, and it would allow some of the ones that we had seen that were kind of in the application process and the review process to be able to attain that permit.

So we didn't want to cap too much because we did have about 100 permits. that were established during that time. So it was really trying to find that balance between allowing the current operators and allowing operators that were in the process and wanted to come on board, the opportunity to come on board.

Commissioner Aguirre: Not expanding the number too broadly. So just to clarify the 150, if you have one permit, you can't have multiple units under that one permit.

Stephanie Cervantes: That is correct.

Commissioner Aguirre: Okay. Thank you.

Chair Hart: Thanks any other commissioners that have comments? Yes, commissioners.

Commissioner Newsom: I have a question for staff. If you could walk us through **the pros and cons of entertaining the alternate time extension motion. Would that not enable the city of Pacifica to go through their phases, develop a policy that is more enforceable? has a little bit more bite and teeth to it, and then be able to come back to us in June 18th, by June 18th, 2025.**

Dan Carl: I suppose that's true, but it's also, I mean, you heard from the city, this is really important for them to get this on the books, to move forward, so they can move forward for the next phase. But yeah, that is something that's available to the commission to move the deadline out.

Chair Hart: But can I just ask a question, fallen out? So what would happen in the meantime if it were delayed? There would be no cap.

Dan Carl: Okay. There would be no cap. Right. So that's the risk.

Commissioner Wilson. Yeah, and **this is why I prefer moratoriums versus caps in the phasing of this because what you don't want to have happen**

is now there'll be a rush to fill the 150 and people will be displaced. And that is an issue. And that's why many communities just go straight for the moratorium while they do their policy, as opposed to putting a number that's higher than their current because you will find property owners rushing in to fill that cap because the opportunity is limited. And so it makes me nervous, but it is, a cap is better than no cap? Maybe? So just a policy question.

Chair Hart: Mr. Carl, do you want to respond to the moratorium versus cap?

Dan Carl: Commissioner Wilson is correct. If you have a moratorium you're going to see, you're not going to go up to the number. One would expect that this number will be reached, they're at 144 right now. You would see with the moratorium, to commissioner Wilson's point, is you'd see attrition. You wouldn't go up, you'd go down. You'll go from one forty-four to something less because as the bad actors are weeded out over the time period that you develop the policies you're going to have less, not more. I think that's a point that Commissioner Wilson's making.

Chair Hart: Okay, can the city just respond to that one more time? on the topic of a moratorium at 144 versus the 150 cap or if you don't want to respond no problem. We're waiting for the city.

Stephanie Cervantes: Thank you. So I'll just say when the city was going through this phase one process, we weren't sure what the timing would be for phase two. And so at that point, it was decided that the cap, and there was the other provisions that were added to the ordinance at that time, was the best way for the cab.

Commissioner Escalante: Question for staff. Um, **I'm going to talk really agree with Commissioner Wilson and Commissioner Newsom's concerns. I mean, I just, you know, I think it's, it's time for us to really be a lot more proactive and making sure that we stop losing bleeding housing units too,** to more STRs.

Can the commission condition a moratorium on this? And I know the city they have to go back to the city and the city has to approve. I get that. But, can the commission condition that on this particular item?

Dan Carl: Yes. But, that they would have to go back to the city council for it to become effective. So if the city council wasn't supportive of that, they wouldn't have to accept that. But yes, the commission has that within your authorities to make changes.

Commissioner Rice: I'm wondering if as an alternative, which doesn't completely address the issues that are being raised, just adjusting the cap down to the 144.

Chair Hart: That would be an option to just which would be essentially.

Commissioner Rice: And would that be something that the city could just agree to here?

Dan Carl: I don't think the city, I won't speak for them, I'll say something and they can speak to it themselves. I think it's pretty clear that the city council is

going to have to make those decisions. And the other thing with the 144, as you heard, it's a slightly fluctuating number. So that's where they think it is right now might be slightly different.

Chair Hart: Yeah, I just want to make a comment. My concern about making that kind of decision today from the diocese is that I feel like I don't have enough information. For example, I'm also concerned about access to the coast. I don't have information about available hotel rooms. I don't have any information about affordable hotel rooms. I don't know what the... current STRs or charging or who's staying there or how big I mean I just feel like we have so little information to make a decision on this at this time.

Personally, I'm supportive of moving forward with this. I don't think there's a huge difference between 144 and 150. We could potentially ask the city to come back at an earlier date. Is that possible? Give a report on this and where they are.

Dan Carl: We certainly could do that. I think that the process is going to take what the process takes and these are, you know, difficult decisions as well you who are in your own local governments know this is a really tough decision and so it's going to take some time for them to work through that. And then they did work through that to get to this point. And I think staff is acknowledging that process. And so I think that's important to say too. But it's really difficult to say how long it will take. I mean, we can ask the city to come back and or staff could give a little bit about where they're at in the process, if that was what you want me to say.

Chair Hart: Let me just go to Commissioner Cummings, you had a comment or did you? I'm sorry, I couldn't tell if you did or did.

Commissioner Cummings: I do and I was also, going to make some comments , and I was going to make a motion too.

Chair Hart: Okay. So why don't you have a seat for now? I think we're moving forward. Why don't you make your comments and whatever motion you'd like to make?

Commissioner Cummings: Sure, I just want to acknowledge the comments that have been made here today. And, I also just want to express my deep concern with short term rentals and the impacts that it has on affordable housing within our communities. As a renter, I've seen many people and having friends who are renters, have seen many people get displaced from their housing with it being converted to short term rentals. You know from our workshop last year, and there's a lot of new information that we've learned about, you know, the benefits of having hosted rentals and trying to limit the amount of short term rentals.

And I will say that a few weeks ago I did go to have a community meeting with Pacifica. And, you know, folks were concerned about short-term rentals in their community. And I know that the City Council members are concerned about them as well. So I think this is the first step and the fact that we're talking about six potential more permits, it's not a significant increase and in the absence of

having some kind of cap, we could see upwards of, you know, more units, because if people hear this conversation and know what's going on, we don't take action today we might see many more units being converted.

So I'm happy to make the motion today, concerns still but moving forward over time. So I'm moving to the Commission reject implementation of amendment number LCP dash two dash PAC dash two three dash zero zero two three dash one, and I'm recommending a no vote.

Chair Hart: Thank you we have a motion and on this one I'd like a roll call vote.

Commissioners voted to have the cap implemented.

From: [Doreen Adams](#)
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Thursday, August 6, 2026 9:53:20 AM

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Dear Commissioners,

Thank you for seeking input for ITEM NO: W15a, LCP Amendment Number LCP-2-PAC-25-0079-2 (City of Pacifica Short-Term Rentals).

We have lived in Pacifica since 2022. Last fall, we purchased our dream home. The address is 1989 Beach Blvd and shares a common wall with 1987 Beach Blvd, an unhosted STR operated by Marbella Lane Vacation Rentals. As part of the purchase disclosures we were told that the adjoining property was a short term rental. We are not against renters or vacationers, and did not consider the matter significant.

Once taking possession of our home, we learned more about some of the concerns our new neighbors have been contending with for more than eight years. We were surprised by the sheer turnover of the property's renters. Sometimes three times a week. Sometimes with more cars than fit on their property; frequently arriving very late at night or very early in the morning. Our home feels less safe with the constant stream of strangers coming and going next door. Many times they (or their guests) come to our door in error or park in our driveway.

Being an unhosted rental, some concerns we have are recurrent. For instance, although smoking is not "permitted" by the property managers, the non-smoking policy is not enforced and those of us directly impacted must regularly ask the renters to stop. Also, the management company sends cleaners to the home between renters, but they do not pick up the waste that blows off the balcony, falls out of their cars, or overflows from the trash cans. Renters don't sort their garbage, and often leave behind piles of food packaging/containers and uneaten food that could have been composted.

The Marbella Lane Vacation Rentals owners frequently speak about being good neighbors and responsible operators; these appear to be empty talking points. Our experience is that they are non-responsive to our concerns when problems arise from their tenants' behavior. A common reply to our concerns is that they will put up a sign to prevent future trouble. (It doesn't.) Living near an unhosted short-term rental is like living in Groundhog Day, with the same problems recurring predictably. In one instance in which Marbella Lane was responsive, the tenant's trash was dumped and unsorted in our receptacles; the property manager contacted the renters, after which they piled their still unsorted bags across the street in front of the public trash bins on the Promenade. The seagulls and ravens pick apart inappropriately stashed garbage bags, which I'm sure is bad for the birds and litters the neighborhood. In a similar example of non-responsiveness, I have been trying to reach the property management for the past two days to notify them about planned construction on our side of the property. The contact phone number posted outside their door is not returning calls. The property manager (who has been our only direct contact in the past) has not been responding to emails.

As we previously mentioned, we are not against renters or vacationers. The cost of housing in California is an issue that must not be ignored. Rental homes are part of the much-needed mix of housing (in addition to apartments, premanufactured homes, condominiums, and residential

homeownership). Unhosted short-term rentals do not contribute to the housing supply or help keep rentals affordable. Further, they do not provide low-cost visitor accommodations. In fact, they appear to employ dynamic pricing to help assure visitors pay the maximum amount that the market will bear. In contrast, hosted short-term rentals utilize idle living space and offer many benefits, including affordable visitor accommodations and investment from within our community.

Vacationers are welcome in Pacifica and in our neighborhood. We have a beautiful coast and a friendly community. Hotels and hosted rentals can assure that all visitors are appropriately resourced (e.g., parking, restrooms, trash).

In January (2026), after years of discussion, review, and negotiation among interested parties, the Coastal Commission Staff appeared to support our city's proposal to balance important visitor-serving accommodations, increase public access to the coast, and provide new opportunities for longer-term housing, as well as new ways to continue protecting the character of the City's coastal neighborhoods. Now, their recommendation would water down and render toothless our Ordinance, which was already passed and in effect in inland Pacifica. The two key elements of Pacifica's STR ordinance—the primary residence requirement and the 60-night cap on unhosted rentals—are somehow no longer viewed by the Coastal Commission Staff as appropriate for our little city. The July (2026) recommendations do not explain why this decision was reversed. This is not what the majority of our community wants. We are left to surmise that big money has taken precedence over the concerns of everyday citizens. We recognize that our coastal community isn't as affluent as our neighbors with the resources to fend off outside interests. Nonetheless, we stand against our community being commoditized for corporate profits and for individuals with no stake in the community. If this is permitted to happen, our community will lose the character that draws people here and makes Pacifica a great place to live and visit.

We urge you to pass the ordinance protecting Pacific's coast and coastal neighborhoods from commercialization. Please help us keep our beaches and neighborhoods safe and accessible.

Thank you for your consideration.

Doreen and Pete Adams
1989 Beach Blvd
Pacifica, CA. 94044

August 7, 2026

Dear Esteemed Members of the California Coastal Commission:

My name is Alvin Salehi and I respectfully urge you to protect something that changed the course of my life and my family's future: the ability for visitors to experience Pacifica the way me and my family have.

I grew up in a motel. My parents were immigrants, and like so many families, we lived with uncertainty and worked with our heads down, just trying to build something stable. Through a lot of sacrifice and hard work, I found my way to law school. I went into public service. I devoted my career to building systems that help other people, especially those who start with less.

Then, about a decade ago, something small happened that led to something big.

One summer, I took a short trip and stayed in an Airbnb in Pacifica. It wasn't a luxury experience. It was something more meaningful than that: it was a window into a life and a place I didn't know existed. I woke up to the ocean. I walked the bluffs. I met neighbors. I ate at local restaurants. I felt the calm, the beauty, and the humanity of this town in a way a quick drive-through never could.

And I fell in love with Pacifica.

So deeply that I reorganized our lives to move here. I launched a company in the Bay Area so my family could settle in Pacifica. That company was built around a mission I care about with my whole heart, helping immigrants and refugees earn meaningful income from home with dignity. And with a lot of hard work and a lot of luck, we eventually bought our first home and became part of this community.

Later, after saving for a long time, we had the privilege of buying a home on the coast. It was a dream, and it is still a dream. But it was also a stretch. The honest truth is we could only afford the mortgage by renting it out as a short-term rental.

We poured love into that home because we wanted other families to feel what we felt. We wanted someone else to have that same moment: the moment where Pacifica isn't just a dot on a map, but a place that reaches you. A place you remember. A place you want to return to, and maybe even build your life around.

That is what's at stake here.

I understand the concerns that residents have raised. Noise. Parking. Parties. Quality of life. These are real issues, and the people who live here full time deserve peace, safety, and community. But I believe we can address those concerns without shutting the door entirely on

responsible, well-managed short-term rentals, particularly those on the coast that are not in dense residential neighborhoods and that can be regulated with clear rules and real enforcement. We've already banned short-term rentals across the rest of the city, but we don't have to shut down the few remaining homes left on the coast.

A full ban isn't just a policy choice. It's a message.

It says: Pacifica is only for those who already made it here.

It says: the coastline is a private privilege, not a shared wonder.

It says: we are willing to trade sustainable revenue and support for local businesses in exchange for a solution that doesn't distinguish between bad actors and good neighbors.

And Pacifica is better than that.

We all know the local joke: "Don't move here, it's always foggy." I've heard it said to visitors passing through, off hand and with a smile, because we love this place and, in a way, we want to protect it. But the truth is what we all know in our bones: the fog is part of the magic. The sun breaks through more than outsiders realize. The coast here is breathtaking. It restores people. And when visitors come and experience this wonder firsthand, they also contribute to it. They eat in our restaurants. They shop in our stores. They discover local businesses. They bring revenue into a city that, by many accounts, is under financial strain.

And this isn't theoretical. As we know, short-term rental taxes generated more than a million dollars in revenue just a couple years ago. That's real money for city services, public safety, and basic needs. In a moment when every dollar matters, it's hard to understand why we would choose to eliminate a meaningful revenue stream entirely, especially if we can keep the benefits while regulating the harms.

What I am asking for is not "do nothing." It is to choose a balanced approach.

If the city believes broad restrictions are necessary, then I urge you at minimum to preserve a limited, well-regulated path for coastal short-term rentals. Put guardrails in place. Increase enforcement. Cap the number. Require local contact response times. Limit occupancy. Impose escalating penalties for violations. Remove permits from repeat offenders. Protect neighborhood peace aggressively.

But don't erase the very thing that helps people discover Pacifica in the first place.

Because I am living proof of what a single stay can do.

A short trip brought me here. It brought my family here. It led to a company devoted to helping newcomers build stable lives. It led to our roots being planted in this community. It led to us investing in Pacifica, not just financially, but emotionally. We vote here. We contribute here. We raise families here. We are not tourists. We are neighbors.

And there are more people like us out there right now, families who could fall in love with Pacifica the way we did. People who will treat this town with respect, who will support local businesses, who will become part of the fabric of the community.

This is what Pacifica is all about. Nurturing our beautiful community while simultaneously affording the next generation of Pacificans an opportunity to fall in love with it – in the same way that you and I fell in love with it decades ago.

Please don't close the door behind you. A total ban shuts everyone out. It doesn't just regulate behavior, it narrows the future.

Choose a compromise that protects residents and preserves opportunity. We've already banned most of the homes in Pacifica. Keep a limited number of responsible coastal short-term rentals open, with strong enforcement and clear accountability. Let Pacifica continue to welcome people in a way that is consistent with our values: fairness, balance, and community.

Thank you for your time, and for your service to our city.

Very truly yours,



Alvin Salehi

From: [Laurel Antonmarchi](#)
To: [NorthCentralCoast@Coastal](#)
Subject: OPPOSE - Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Wednesday, August 5, 2026 2:11:38 PM

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I am a resident of Sharp Park in Pacifica writing in **STRONG OPPOSITION** to the CCC staff's recommended amendments to the City of Pacifica's short-term rental ordinance.

I came to Pacifica as a newcomer and fell in love with this community. I have built real friendships here and want to stay. But my family is already priced out of buying here, and these amendments would make that permanent.

Homes are NOT hotels. Pacifica's ordinance exists to keep it that way.

The ordinance was developed through an extensive public process and approved unanimously by two City Councils and the Planning Commission. The staff's proposed deletions would gut the two provisions that make it work: the primary residency requirement and the 60-day annual rental cap.

Removing the residency requirement opens Pacifica's housing stock to investors from anywhere in the world. Removing the 60-day cap eliminates the only meaningful limit on how intensively a home can be operated as a de facto hotel. Together, these changes drive up prices and push out the families and neighbors that make this town worth living in.

I urge the Commission to respect the City's work and reject the staff recommendations.

Thank you for considering my comments.

Laurel Antonmarchi
Sharp Park, Pacifica, CA
l.antonmarchi@gmail.com

From: B
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Wednesday, August 5, 2026 11:15:19 PM

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Dear Commissioners,

I strongly object to your apparent plan to weaken Pacifica's current rules regarding short-term rentals.

Over the years, I have personally spoken with Pacifica and San Mateo County residents who lost their housing after their landlords chose to remove their rooms or apartments from the housing market and rent them for more money on Airbnb.

And many Pacifica residents have suffered quality of life issues after out-of-town landlords turned homes on their streets into full-time vacation rentals.

Would you like to have strangers drinking, drugging, and playing loud music late at night next to your family's home ? That is too often the reality faced by people unlucky enough to have an Airbnb for a neighbor.

Pacifica's regulations requiring Airbnb landlords to actually live in the homes they're renting out --and limiting how many days per year those rentals can occur-- were not drafted in a vacuum. Our ordinance was passed in response to the very real problems short-term rental opportunists have created in our community.

Please protect and preserve the Coast by respecting our short-term rental ordinance and not weakening it in any way.

Many thanks,

Brendan Bartholomew
Pacifica resident

From: [Marisa Beck](#)
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Tuesday, August 4, 2026 4:57:38 PM

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Please do not take away the rules we have in place to protect residents of Pacifica!

I am lived in Pacifica for 15 years and it's a bummer to see so many rentals already in my neighborhood (just off palmetto, near the ocean). I already feel like there are many vacant houses that are solely used for rental purposes. I do not want to see what would happen if you removed the current laws we put in class.

Please respect the laws currently in place so that Pacifica stays a residential community rather than a bunch of short term rentals.

Thank you, Marisa Beck

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: Ringuette, Oceane@Coastal
Subject: FW: Public Comment on August 2026 Agenda Item: City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Friday, August 7, 2026 4:45:55 PM

From: Dylan B <vraskagamer@gmail.com>
Sent: Friday, August 7, 2026 4:24 PM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on August 2026 Agenda Item: City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).

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Hello Coastal Commision,

My name is Dylan Benander, and I am a renter in Pacifica. I am writing to demand that, despite pressure, you **pass the Local Coastal Plan Amendment (LCPA) unchanged to allow the enforcement of regulations on Short Term Rentals to apply in the coastal zone.**

My time living here in Pacifica has been plagued by rent increases and prohibitive housing costs. I work full-time as a teacher in the local school district, and I know that rent costs for me and my colleagues often eat up a large percentage of our budget, sometimes upwards of 40%! This already makes it difficult for us to provide for our loved ones and save for our future.

An increased allowance for short-term rental properties (STRs) will be disastrous for renters like me. It will further increase housing costs and limit availability for the people who work in Pacifica and keep it running. The LCPA does an excellent job regulating these properties to allow for visitors of our city to have access while balancing that with the needs of those of us who live here.

Any attempt to amend these restrictions to make them more advantageous to AirBnb and other STR companies is nothing short of putting the interests of already well-off companies above the interests of the people you are supposed to serve. Unhosted STRs drastically reduce housing supply, and the working people of the Coastal Zone deserve livable neighborhoods.

Additionally, the decision to create the LCPA in the first place was made with much

community input from people in Pacifica. In America, we are supposed to make our decisions based on democratic deliberation and input, not the interests of a few wealthy companies. I hope you will do the right thing and pass the LCPA without amendment.

Thank you,

Dylan Benander

Dear Commissioners,

My family and I are long-term Pacificans. I am 41 years old have lived here for my entire life. My family has also run a small business in Pacifica for 22 of those years.

Three years ago, we lost our housing at 124 Salada because the owner decided to convert all the units in our apartment building into full-time Airbnbs. This was very upsetting to us, as we had lived there for a long time and I had just painted the apartment with paint and supplies I had paid for out of my own personal money. Also, the apartment was right across the street from our place of business, so we lost housing that wasn't just comfortable and affordable, but also very convenient for our family. While we lived there, the landlord started Airbnb'ing the apartment upstairs, and all the noise was terrible. When we were told we had to leave, we were only given 60 days to find another place to live. One of our neighbors, a single woman, pleaded with the landlord for more time because she had no family and nowhere to go. The landlord only gave her another 9 days.

I am telling you this story so you will understand that there are real people in Pacifica who have been hurt by homes taken away from them and turned into full-time Airbnbs. We are hard-working, small business owners who call Pacifica home. I am asking you to please keep Pacifica's ordinance strong by NOT removing the primary residence requirement for STR operators and keeping the limit of 60-nights on whole-house Airbnbs. I know there are other people here who have also lost their homes to Airbnbs and I would hate to see this happen to anyone else.

Thank you for reading this email.

Josh Biancalana

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: [Ringuette, Oceane@Coastal](mailto:Ringuette,Oceane@Coastal)
Subject: FW: Subject: Oppose the 60-Night STR Limit – Protect Coastal Access in Pacifica | LCP-2-PAC-25-0079-2
Date: Friday, August 7, 2026 3:35:06 PM

From: catherine burton <itscats@yahoo.com>
Sent: Friday, August 7, 2026 2:25 PM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Fw: Subject: Oppose the 60-Night STR Limit – Protect Coastal Access in Pacifica | LCP-2-PAC-25-0079-2

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Subject: Oppose the 60-Night STR Limit – Protect Coastal Access in Pacifica | LCP-2-PAC-25-0079-2

Dear Chair and Members of the California Coastal Commission,

I am writing as a Pacifica resident to respectfully urge the Commission **not to approve the proposed 60-night annual limitation on unhosted short-term rentals in Pacifica** under LCP Amendment **LCP-2-PAC-25-0079-2**.

I support reasonable regulations that address genuine neighborhood concerns such as excessive noise, parking, trash, occupancy, and irresponsible operators. But limiting an otherwise compliant short-term rental to only 60 nights per year is different. It restricts the availability of an important form of coastal accommodation and, in doing so, restricts meaningful access to the California coast.

A simple encounter in my neighborhood recently reminded me why this matters.

I was outside watering my garden with my dog welcoming people passing by when a young couple walked past my house returning from the beach. Their cheeks were sunburned, they were smiling and absolutely glowing from their day. I asked them how the beach was, and they enthusiastically told me how amazing it had been. We chatted briefly, and they continued walking.

The following day, while walking my dog, I saw the husband again. He was packing their car.

I said, “Heading home?”

He said yes, and I realized that they had been staying in a neighborhood short-term rental just **one block from the beach**.

That small interaction has stayed with me because it illustrates what coastal access actually looks like in people's lives.

Access to the coast is not simply the ability to physically walk onto a beach. People also need a practical and reasonably affordable place to stay close enough to enjoy it.

Short-term rentals allow couples, parents with children, families traveling together, people bringing grandparents or extended family, and people traveling with pets to spend time in Pacifica in a way that a conventional hotel room often cannot accommodate. They can prepare meals instead of eating every meal in a restaurant, stay together rather

than renting several hotel rooms, bring their children and pets, and stay within walking distance of the beach.

Keeping these accommodations available throughout the year expands the number and types of Californians who can actually experience our coastline.

That principle is reflected directly in California coastal policy.

Coastal Act Section 30210 requires that maximum coastal access and recreational opportunities be provided “for all the people.”

Coastal Act Section 30213 requires that lower-cost visitor and recreational facilities be **protected, encouraged, and, where feasible, provided.**

And **Section 30222** gives priority to visitor-serving recreational facilities that enhance opportunities for coastal recreation. Pacifica's own Local Coastal Program similarly requires the City to protect and encourage lower-cost visitor facilities and to provide maximum coastal access and recreational opportunities for all people.

Most importantly, the Commission's own staff analysis recognizes the connection between STRs and coastal access. **It states that overnight STR accommodations themselves constitute recreational access opportunities, along with the beach trips, hiking, sightseeing and other coastal activities those overnight stays make possible.**

The staff report also acknowledges that STRs can provide a **“unique and important source of visitor-serving accommodation in the coastal zone, especially for families and groups,”** and that the Commission has historically found that undue restrictions can be inconsistent with policies prioritizing public access and visitor-serving opportunities.

Pacifica already regulates STRs. There is a citywide cap of **150 STRs—roughly 1% of Pacifica's housing stock—**and the City currently reports only approximately **74 permitted STRs citywide, with 43 in the coastal zone.** STR operators are also subject to permits, transient occupancy taxes, safety requirements, noise rules and other operating requirements.

The new ordinance goes far beyond addressing nuisance behavior. In addition to the 60-night limitation, it includes primary-residence requirements, parking and occupancy rules, exterior noise monitoring, visitor restrictions, safety inspections, signage, 24-hour contact requirements and permit-revocation procedures.

Those regulations give the City extensive tools to deal directly with problem properties.

A responsible STR that complies with those requirements should not then be forced to sit empty for most of the year simply because an arbitrary number of nights has been reached.

Indeed, Commission staff estimates that the combination of the new restrictions could reduce potential unhosted STR availability by **nearly 85%.** At the same time, the report states there is little evidence that these restrictions would actually create additional long-term housing, particularly affordable housing.

That is an extraordinarily large reduction in visitor accommodations for an uncertain housing benefit.

There is also an important distinction between a hotel room and a home available to visitors. A family of five, a multigenerational family, or a family traveling with a dog cannot necessarily substitute one hotel room for a small house or apartment near the beach. The availability of kitchens can also substantially reduce the cost of a coastal trip for families who cannot afford restaurants three times a day.

If California truly wants its coast to remain accessible **“for all the people,”** we should be careful about eliminating the very accommodations that make an overnight coastal visit practical for ordinary families.

Pacifica should regulate **behavior,** not arbitrarily ration otherwise lawful and responsible coastal lodging.

Please protect reasonable STR availability in Pacifica and **reject the proposed 60-night cap on unhosted short-**

term rentals, or require the City to adopt a substantially less restrictive alternative that preserves meaningful year-round visitor access while maintaining strong good-neighbor protections.

Our coastline belongs to all Californians. For many families, access to a reasonably priced home, apartment, or cottage near the beach is what turns the legal right to visit the coast into the practical ability to actually experience it.

Thank you for considering my comments.

Sincerely,

Catherine Christiansen

Pacifica, California

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: Ringuette, Oceane@Coastal
Subject: FW: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Friday, August 7, 2026 10:15:15 AM

From: Sophia Chiang <soph@yahoo.com>
Sent: Friday, August 7, 2026 9:00 AM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).

You don't often get email from soph@yahoo.com. [Learn why this is important](#)

Dear Members of the California Coastal Commission,

I respectfully ask the Commission to require revisions to Pacifica's proposed Short-Term Rental ordinance before certifying it.

After reviewing the proposed ordinance, I support many of its provisions. It already includes comprehensive protections for neighborhoods, including:

- Annual permits, inspections, and proof of insurance.
- A 24/7 local responsible party.
- Required noise monitoring.
- Occupancy and parking limits.
- Quiet hours.
- Significant fines and permit revocation for violations.

These requirements provide the City with substantial authority to address nuisance properties and irresponsible operators.

What I question are the additional restrictions that are not tied to operator behavior:

- Requiring every STR to be the operator's primary residence.
- Limiting unhosted rentals to 60 nights per year.

These restrictions apply equally to responsible operators with perfect compliance records and to problem properties. I have not seen evidence demonstrating that these particular restrictions are necessary once the ordinance's extensive operational and enforcement provisions are already in place.

Short-term rentals provide overnight accommodations that support public access to the California coast while generating business for Pacifica's restaurants, shops, and local services. Any restrictions that reduce those

accommodations should be supported by clear evidence that they are necessary to address documented impacts.

I respectfully ask the Commission to require the City to revise the ordinance by removing the primary residence requirement and the 60-night cap while retaining the strong operational standards and enforcement provisions that directly address neighborhood concerns.

Thank you for your time and consideration.

Sincerely,

Sophia Chiang
Pacifica, CA

California Coastal Commission
c/o: Stephanie Rexing, North Central Coast District Manager
Oceane Ringuette, North Central Coast District Supervisor
North Central Coast District
California Coastal Commission
Via email: NorthCentralCoast@coastal.ca.gov

Date: August 7, 2026

Subject: **City of Pacifica LCP Amendment Number 2-PAC-25-0079-2 (Short-Term Rentals)**

Dear Coastal Commission:

My name is Sam Casillas and I have been a resident of Pacifica for 23 years. In 2003 I was fortunate to buy my first home here: a two-bedroom, one bath bungalow with no garage and just two blocks from the beach. I thought I had gone to heaven when a welcoming committee knocked on my door and handed me a little rose plant that I still have today. A few years later I got married to my wonderful wife and over the next 10 years we proceeded to save our money to either renovate our place or find a new place here in our neighborhood of Pedro Point. We were then fortunate enough to find a run down property just a few houses up from ours and over the next 8 years built a new home for ourselves. Over that time many people asked us what we wanted to do with our old place: did we want to sell it? Did we want to rent it? Would we AIRBNB it? We explored all our options.

A person who has multiple un-hosted AIRBNB's in our neighborhood wanted to buy it from us: all cash, at a premium price where no family could compete at that price level. We asked the surrounding neighbors how they would feel about an AIRBNB going in and they all agreed: It would destroy the close community on their street and they wouldn't be very happy with me and I understood and I have to live here. We told the potential buyer that we would not be selling and that in our old age we would return to this place so in the meantime we would rent it to someone who needed a place to live because Pacifica is already a hard place to find safe affordable housing. He asked why wouldn't I just AIRBNB it and make more than double what I can make in rent? Some of these places offer nightly rates of \$2,500 (so let's stop the nonsense that these places are adding more access to the coast for regular and disadvantaged families).

So why wouldn't we AIRBNB our place? We could make gobs of money. Pay off the mortgage early, maybe buy a Ferrari and spend summers in Europe.

I will tell you why we wouldn't:

These STRs are tearing our neighborhoods apart; there are people coming in, throwing huge parties and trashing our neighborhoods while the corporate owners ignore our concerns of criminal activity because the owners don't live here; we do. They hire fancy lawyers to meet with the coastal commission and have you now say our ordinance is legally flawed, yet just down the highway in Half Moon Bay they have pretty much the same ordinance in place (60

days for un-hosted STRs with a natural person owner and unlimited nights for a hosted STR), but Pacifica is not good enough for the same protections?

Yet, the bigger issue reveals the big lie of how they supposedly bring revenue to our city and what is really happening with these STRs: they are taking homes away from perspective families who just want to live in good safe community here they know their neighbors. By taking these homes out of our housing stock STRs have created a school crisis in Pacifica. Last year Pacifica closed an elementary school and a middle school because the state cut our school funding due to a decrease in enrollment which is directly tied to the number of un-hosted STRs that could have housed families instead of transient hotel rooms.

It is insulting that the people of Pacifica have to put up with unmanaged hotels with unlawful behavior for so long which are also killing our schools.

Pacifica is the last city in San Mateo County without the protection of a proper ordinance, and has more un-hosted STRs than Half Moon Bay, Belmont, Atherton, Woodside, Brisbane, Hillsborough, Colma, and Portola Valley combined.

The Coastal Commission continues to state how important housing is needed on the coast, yet here we are with a citizen directed ordinance that is being gutted by the CCC which would put at least 200 units back into housing stock for families and stop the bleeding of our schooling crisis. The importance of passing this ordinance intact in the coastal zone would return our community to ALL of Pacifica's neighborhoods, bring in new families and to stop the rampant overpriced hotel commercialization of our residential neighborhoods.

Because of these STRs in Pacifica, our community has experienced population decline and the loss of families and children in our school systems. We ask the Coastal Commission to push for the approval of this ordinance as originally submitted as swiftly as possible so it can go into effect in our city's coastal areas and save our community. Please help us before our city becomes a desert of hotel rooms with no families and no schools.

Thank You,

Samuel Casillas

Board member, Pedro Point Community Association

Past Vice-Chair, Pacifica Economic Development Committee

Past Member, Pacifica Sea Level Rise Adaptation Planning Committee

Past Co-Chair GGNRA Board Liaison Committee

Past Member, Pacifica GPU Community Outreach Committee

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: Ringuette, Oceane@Coastal
Subject: FW: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Friday, August 7, 2026 1:04:47 PM

From: Hinsien Chan <hinsienchan@gmail.com>
Sent: Friday, August 7, 2026 10:21 AM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).

You don't often get email from hinsienchan@gmail.com. [Learn why this is important](#)

Dear Commissioners,

I am writing regarding Pacifica's proposed short term rental regulations. I support the City's effort to place reasonable restrictions on STRs and am concerned with the staff recommendation to remove the primary residence requirement and 60 night limit.

One of the primary arguments for preserving STRs appears to be that they provide affordable or lower cost coastal accommodations, particularly for families and larger groups. I believe that assumption deserves more scrutiny.

To get a broader picture of actual STR costs, I conducted a simple search of Airbnb for Pacifica. I searched for accommodations for 2, 4, 6, and 8 guests and looked approximately six months in advance to reduce the likelihood that frequently booked properties would be excluded because they were already reserved. I searched for two night stays but converted the totals to nightly rates for easier comparison with hotel pricing.

The results showed a wide range of prices, but many of the Pacifica listings that could accommodate families were \$400–\$700 or more per night, with some larger properties exceeding \$1,000 per night.

This also appears consistent with evidence previously submitted to the Commission. That analysis found Pacifica unhosted STRs averaging approximately \$235–\$495 per night, compared with approximately \$193 per night for a hotel room. My review of currently advertised Airbnb listings suggests that many family sized STRs can cost substantially more.

For families, this distinction is particularly important because the staff report specifically identifies families and larger groups as beneficiaries of STR availability. A family of four can often stay in a standard hotel room without needing multiple rooms. With many family sized STRs costing \$400–\$700 or more per night, it is not clear that STRs should automatically be considered a lower cost alternative to hotels.

STRs may provide families with additional space, kitchens, multiple bedrooms, and other amenities that hotels do not. Those are legitimate benefits. But they are benefits of choice and convenience, not necessarily affordability. Additional lodging capacity should not automatically be characterized as affordable coastal access.

If the Commission believes STRs should be preserved because they provide lower cost accommodations for families and improve affordable coastal access, I encourage the Commission to consider a straightforward alternative. **Require STR nightly rates to remain below comparable market rate hotel accommodations.**

This would directly connect the policy with its stated public benefit. It would ensure that STRs actually provide a lower cost option for coastal visitors while also creating additional competition that could encourage hotels to keep their rates competitive.

More broadly, simply counting the number of STRs or the number of beds they provide does not tell us whether those accommodations make the coast financially accessible. The Commission should consider actual nightly prices, including fees, when determining whether STRs are providing lower cost coastal access.

I support making the California coast accessible to families and other visitors. If STRs are being protected because they are said to provide affordable lodging for families, their actual prices should support that claim. Requiring STRs to remain below comparable market rate hotel accommodations would ensure that the policy actually delivers the affordability benefit being used to justify their protection.

Thank you for your consideration,

Pacifica Resident

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: [Ringuette, Oceane@Coastal](mailto:Ringuette,Oceane@Coastal)
Subject: FW: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals)
Date: Friday, August 7, 2026 3:48:15 PM

From: Cherie Chan <chan.cherie@gmail.com>
Sent: Friday, August 7, 2026 3:39 PM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals)

As a resident of Pacifica's Coastal Zone, I am writing to express my strong support for hosted home shares. When thoughtfully regulated, home-sharing offers an opportunity for residents to achieve financial stability while warmly sharing the beauty of the California coast with visitors.

I proudly support the Short-Term Rental (STR) ordinance passed by the Pacifica City Council. The result of eight years of dedicated work, 14 Council meetings, and four study sessions, this ordinance strikes a highly successful balance: it welcomes visitors through a variety of accommodations while protecting the charm of small-scale experiences which tread lightly on our coast.

This ordinance champions our community by preserving residential homes for actual residents. It sensibly ensures that larger-scale visitor accommodations remain in properly zoned coastal commercial areas. By doing so, we allow essential businesses like hotels—which provide vital infrastructure, ADA protections, and local services—to thrive alongside regulated home-sharing, rather than unfairly competing against unregulated, commercial mini-hotels in private neighborhoods.

The true strength and success of Pacifica's STR ordinance rely on two essential provisions: **the primary residence requirement** and **the 60-night cap on unhosted rentals**. These vital measures safeguard our local housing supply from out-of-town corporate investors. They keep Pacifica aligned with the vast majority of San Mateo County in actively preserving the vibrancy, affordability, and close-knit connection of our coastal communities.

Now is the time to unite in our shared commitment to the Coastal Act. Let's enthusiastically fulfill the Coastal Commission's true charter: ensuring equitable, joyful coastal access for everyone, rather than enabling a system that caters exclusively to out-of-town investors.

Thank you for your time, your service, and your dedication to protecting our coast for future generations.

From: [Sophia Chiang](#)
To: NorthCentralCoast@Coastal
Subject: Please Require Revisions to Pacifica's Short-Term Rental Ordinance
Date: Thursday, August 6, 2026 4:54:44 PM

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Dear Members of the California Coastal Commission,

I am writing as the owner of a short-term rental in Pedro Point, Pacifica, and I respectfully ask the Commission to require revisions to Pacifica's proposed short-term rental ordinance before approving it.

I understand and support the need for reasonable regulations that address genuine problems such as excessive noise, unsafe conditions, or repeated violations by bad actors. Every neighborhood deserves those protections. However, I do not believe the proposed ordinance strikes the right balance. It places significant restrictions on responsible homeowners without sufficient evidence that they are creating widespread problems.

My home has welcomed hundreds of families visiting the California coast. Our guests have included families on vacation, grandparents visiting loved ones, hikers, surfers, wedding guests, and people celebrating life's important milestones. They have overwhelmingly been respectful visitors who support Pacifica's restaurants, coffee shops, grocery stores, and small businesses.

The home has also served my own neighborhood. Over the years, I have opened it free of charge to neighbors who needed a place for family members to stay during weddings, milestone birthdays, graduations, memorial services, and other important events. I have always believed the home should be an asset to the community, not a burden.

One of the Coastal Commission's core responsibilities is protecting public access to California's coast. Short-term rentals play an important role in fulfilling that mission by providing lodging options for families and groups that cannot easily be accommodated in traditional hotels. Many visitors rely on homes with kitchens, multiple bedrooms, and neighborhood settings that hotels simply cannot provide. Restricting responsible short-term rentals reduces the variety of overnight accommodations available and makes it more difficult for many Californians to enjoy our coast.

Responsible short-term rentals also provide meaningful economic benefits to Pacifica. Visitors staying in these homes spend money at local restaurants, cafés, grocery stores, retail shops, and other small businesses throughout the city. They generate Transient Occupancy Tax revenue that helps fund essential city services. At a time when Pacifica faces ongoing operating budget challenges, reducing visitor accommodations and the economic activity they generate should not be undertaken without

compelling evidence that such restrictions are necessary.

I also encourage the Commission to consider whether the proposed restrictions are proportional to the actual issues they seek to address. Existing laws already provide tools to address noise, parking, nuisance behavior, and other violations when they occur. Those rules should be enforced against the relatively small number of bad actors rather than imposing broad restrictions on responsible property owners who have operated successfully and in good standing for years.

For these reasons, I respectfully ask the Commission to send the ordinance back to the City of Pacifica for revisions, including:

- Eliminate the 60-day annual cap on unhosted rentals.
- Remove the primary residence requirement.
- Allow existing operators in good standing to continue operating through an appropriate grandfathering provision.

I believe Pacifica can protect its neighborhoods while also preserving public coastal access, supporting local businesses, respecting responsible property owners, and maintaining the diverse lodging options that make our community welcoming to visitors from across California and beyond.

Thank you for your time, your service, and your careful consideration of this important matter.

Sincerely,

Sophia Chiang
Pacifica Property Owner
Pedro Point

From: [Kate Chinca](#)
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals)
Date: Thursday, August 6, 2026 4:36:42 PM

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To Our Coastal Commissioners,

Thank you for giving us the opportunity to give comments to you regarding the STR issues for the West Side of Highway 1 in Pacifica.

Having read so much of what is attached to our resident concerns and those who are part of a Tourism group, we decided not to write an extremely lengthy comment in the hopes that this will be to the point.

We have lived in Pacifica for over 50 years. Love it! Care for it! Support it! Raised two children here and have lived in San Francisco and Daly City before moving here. We have always been near the Beaches and on vacation even went to Santa Cruz. We have never lived close enough to walk to the beach.

We are completely dumbfounded that there are not more parameters for these "owners" who want control of our beach neighborhoods and the revenue they want their businesses to bring to them. Since when do these entrepreneurs have the right to claim what they consider to be theirs because they want to open a business in our residential areas? We have never understood why this constitutes so much bartering between the involved cities/CCC/residents.

We owned a business in Pacifica. It was successful and there were rules to follow. It was in a proper shopping center and there were a second set of rules to follow for the center. That's usually how businesses are run.

If you have ever driven along our Pacifica beach near the Pier, you will find that parking is often at a premium. That parking should be for anyone or everyone who wants to visit the beach. No one "owns" those spots and they are there to give others the opportunity to come and enjoy our beautiful ocean. We have experienced an AirBnb in our neighborhood. It's not only for families to rent a home, it's often for parties that include anywhere from 6-9 vehicles that need to park. How does that open up our beach parking to others to come and enjoy? You have heard nightmare stories about many of the STR rentals. It's not necessary for us to go over them again. They have not changed. We can barely drive over on Pedro Point for the congestion that the cars produce let alone with tourist vehicles. How do emergency vehicles navigate?

We have listened at so many meetings from the people who want to make money off of creating motels/hotels out of our homes and neighborhoods. If you do not live near one of these, you will not know what it can do to a neighborhood. If you do and have no issues, consider yourself to be very lucky.

The Primary residence requirement and the 60 day cap on unhosted homes should not be a huge trial. Of course, that is if you intended to make more money and have found that it cuts into your profits.

What about the hotels and motels that are constants in our city? Why do you want to consider undercutting them for a group of people who more than likely don't live in any of the homes in question. And, who are the members of the Pacifica for Responsible Tourism Group? We can't find a list of the members. Do they live here

or do they just want to get wealthy off of the Coast in Pacifica?

And, why are some cities like Half Moon Bay and Del Mar being allowed to make changes and we are having to fight for them? It feels as though we are the poor man's city that is the last stanchion available to appease these conglomerate neighborhood eaters.

When reading the sweet stories of how some renters had such a beautiful experience for many reasons when they stayed here it can be endearing. However, if someone is down on their luck and robs a bank but tells you a nice story about it, will they get to just do whatever it is they want because they will benefit?

These groups would have enough revenue following the STR ordinance that Pacifica has adopted as a city. Anything more than that is truly greed and it's not pretty.

Please consider those of us who want to keep neighborhoods for our neighbors. We have worked very hard to be here and don't feel that any group should come in to attempt to make money off of us. We will continue to drive to the beach and park there. We will continue to go to Santa Cruz and enjoy spending the money to be near the shore in a lovely hotel where there is a manager to take care of any issues that arise and even meander to Monterey. We will be happy to be tourists who pay the price of staying without infringing on these city's citizens. But someone needs to have a handle on what's offered and we hope that will include all of Pacifica. As Pacifica neighbors, we should not be having to spend so much time on this but putting our energies in bringing a more complete and comprehensive type main street for tourists to come to and enjoy.

Please give us a hand with this.

Sincerely,

Gary and Kate Chinca

1315 Aspen Dr.

Pacifica, CA 94044

From: dwaincoggins@gmail.com
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Wednesday, August 5, 2026 11:53:50 AM

[You don't often get email from dwaincoggins@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

My name is Dwain Coggins. I have owned property in Pacifica since 2020. I am very interested to implement a short term rental policy consistent with amendments passed in neighboring communities such as Half Moon Bay. This would include 1)a limitation on the number of UNHOSTED rental days to 30 each year and 2) prevent corporations or individuals from owning and doing short term rentals for more than 1 address.

I fully support the notion that homeowners can generate revenue from their home with either long term (>30 day) rental agreements or HOSTED short term rentals.

My direct experience does NOT support the Coastal Commission staff statement that there is no evidence that STRs would transition to longterm rentals with cheaper rates. My next door neighbor at 1561 Grand Avenue used to rent their home as a STR for \$700/night (that translates to \$21,000/month if rented for 30 days!). These prices create severe upward pressure on home prices and do not in any way encourage more low income housing.

When the Pacifica City Council changed the STR rules for properties east of Hwy 1, and added restrictions on STR rentals, my neighbors switched the rental of both of their units to long term rental at \$1500-\$2500/month.

This resulted in much cheaper housing cost for the public (the new renters). Long term renters are active participants in our community and put their children in our schools allowing our schools to get more state and federal financial support.

I feel this is a critically important issue for the city of Pacifica and strongly urge the Coastal Commission to enact the same STR regulations in the Coastal zone as we have enacted in our community east of Hwy 1 (non-coastal zone).

Thank you.

Sent from my iPhone

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: Ringuette, Oceane@Coastal
Subject: FW: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Friday, August 7, 2026 3:34:50 PM

From: Connie <constellation747@comcast.net>
Sent: Friday, August 7, 2026 2:19 PM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).

You don't often get email from constellation747@comcast.net. [Learn why this is important](#)

Dear Commissioners,

I am a resident of Pacifica, having resided in Park Pacifica (at the “BOV” = Back of the Valley) for 34 years. In May of 2022, an out-of-town Investor bought the house across from me and turned it into an unhosted STR “operated” by the Marbella Lane Corporation. An absentee property owner driven solely by profit subjected us to loud parties, speeding vehicles, overflowing garbage bins, overgrown weeds and a parade of inconsiderate strangers who disrupted our once tranquil street. **An indifferent Marbella Lane rarely—and certainly never timely—responded to neighbors’ multiple complaints.**

With the assistance of PACIFICA HOMES ARE NOT HOTELS—and the strengthening of Pacifica’s STR Ordinance—Sequoia Way has reclaimed its neighborhood! We persisted in our complaints to the city and plastered the court with PACIFICA HOMES ARE NOT HOTELS signs. The Investor got the message and recently sold the house to a nice family with two children. Prospective buyers for a second house for sale on Sequoia Way also heeded our signs and it was purchased by another family with kids. YES! *Children have returned to Sequoia Way!!* The retirees on our cul-de-sac are overjoyed! (As is our school district, with additional students enrolled in our

local elementary school!)

Pacifica residents living near or next to unhosted STRs in the Coastal Zone should not have to wait any longer for Pacifica's STR Ordinance to go into effect to obtain relief. For full relief to occur, however, the Commission must not remove the PRIMARY RESIDENCE REQUIREMENT or the 60-night MAXIMUM ON UNHOSTED STR RENTAL NIGHTS from the Ordinance. For nearly eight years, Pacifica's City Council has extensively studied and engaged the public regarding these complicated issues. At long last, the City's most recent Ordinance struck a reasonable and respectful balance between protecting its coastal zone property owners and facilitating visitor access to the coast. Please do not undo it (especially after having viewed it favorably a mere six months ago!)

STR renters at homes in Pacifica's Coastal Zone have severely disrupted the peace and quiet (and sanity!) of that once-quiet neighborhood with loud parties, garbage, trespassing, vandalism, comings and goings at all hours of the night, theft and public urination. Please help Pacifica's coastal zone property owners reclaim the quiet, peaceful and safe enjoyment of *their* neighborhood as *my* cul-de-sac successfully did in "BOV" Park Pacifica. My immediate neighborhood provides concrete evidence of STRs returning to the community to be utilized as family housing. **PLEASE PASS THE CITY OF PACIFICA'S AMENDMENT TO ITS LCP IMPLEMENTATION PLAN'S SHORT TERM RENTAL PROVISIONS WITH THE PRIMARY RESIDENCE REQUIREMENT AND THE 60-NIGHT CAP ON UNHOSTED RENTALS INTACT.**

Thank you for your attention to this matter.

Respectfully submitted,

Connie Menefee

Sequoia Way, Pacifica

From: [Linda Corley](#)
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Thursday, August 6, 2026 9:42:36 AM

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Dear Commissioners,

I strongly object to your apparent plan to weaken Pacifica's current regulations regarding short-term rentals.

Over the years, I have personally spoken with Pacifica and San Mateo County residents who lost their housing after their landlords chose to remove their rooms or apartments from the housing market to rent them for more money on Airbnb. My daughter and her family, who are renters in Pacifica, were forced to move out of their previous home for this exact reason. Finding a rental home has become increasingly difficult due to this trend. She now lives directly across the street from a short-term rental with her three children, which raises serious concerns about the impact of a constant influx of vacationing guests on families raising children.

I have been a resident of Pacifica since 1950 and raised my family here. This is a community, not just a tourist destination, and we need it to stay that way. For residents who cannot afford to buy and must rent, maintaining stable housing is critical.

Pacifica's regulations requiring Airbnb hosts to primary-reside in the homes they rent and limiting the number of rental days per year were passed in response to the very real problems short-term rentals have created in our community.

Please protect and preserve our community by respecting our short-term rental ordinance and not weakening it in any way.

Many thanks,

Linda Corley
Pacifica resident of 76 years

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: Ringuette, Oceane@Coastal
Subject: FW: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals)
Date: Friday, August 7, 2026 1:05:34 PM

From: David Costa <demon62650@hotmail.com>
Sent: Friday, August 7, 2026 11:32 AM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals)

You don't often get email from demon62650@hotmail.com. [Learn why this is important](#)

Commissioners,

I am writing to you in regards to City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).

Until now, I have not been actively involved in the opposition to unrestrained short-term rentals in Pacifica, where I have resided for forty years. In this regard, I have trusted that the city council would eventually produce an ordinance which would place reasonable restrictions on the out-of-control expansion of STRs and the corresponding disruption of neighborhood cohesion. After many years and countless meetings, the City of Pacifica has finally done so. It is beyond belief that the Coastal Commission's staff would make any recommendation for modification of the proposed ordinance, particularly when the Coastal Commission has previously approved more stringent restrictions by other cities.

The commission's staff claims that Pacifica has not produced data to show that "the proposed STR restrictions would create additional longer term housing opportunities." The logic that such "long term housing opportunities" would be created is so obvious that one wonders why the Commission's staff would even make this complaint. The staff certainly didn't request such data before making its recommendations and, in any case, the data shows that because of the

proposed ordinance, a number of STRs have already converted to long term rentals.

The staff's opinion that there is nothing to show that STRs drive up home prices is absurd. It's simple logic that if you reduce the number of houses available for sale, the prices will go up. This is another example of the staff asking for data that logic would dictate is not necessary to prove a point. It also speaks of undue influence by out of state parties on the staff's recommendations.

I have had personal experience with the disruption of unhosted, poorly regulated rentals on my street. One in particular occurred over a two year period. The owners of the property next door to ours did not live on the property but had a long-term renter. That person, in turn, chose to rent rooms in the house to other individuals, some short term and others longer. At times, there were as many as nine non-related individuals living in the house, with their corresponding vehicles parked on or nearby the property. There were regular all night parties hosted by one person or another. On one occasion, we were awakened in the middle of the night to see someone juggling lit torches into the air with no regard for the dry tree debris on the ground. On another occasion, I returned home late from work to find that almost the entire street (we live on a cul-de-sac) blocked by more than ten vehicles. A party was ongoing and I had to knock on the door to ask that the owners move their vehicle so that I could get my car to the garage.

Given my experience, I question whether Pacifica was too lenient in allowing an absent owner to have a resident "operator" (long term renter or manager) to monitor the activities of a short term renter.

The above may be an extreme example of the harm that can be caused by poorly regulated STRs, but numerous other horror stories were provided to the city council by affected citizens. One wonders whether the Commission's staff gave due consideration any of the negative consequences caused by full time unhosted STRs. In my opinion, the staff's recommendations show influence by the two groups that oppose STR restrictions--- greedy corporations like Airbnb that care more about their out of state clients than the neighborhoods

disrupted by them, and selfish home owners who complain about the loss of financing for their European vacations.

I urge the Commission to approve the Pacifica STR ordinance in its entirety.

David Costa

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: Ringuette, Oceane@Coastal
Subject: FW: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Friday, August 7, 2026 10:08:56 AM

From: HD <hdaltin1@gmail.com>
Sent: Friday, August 7, 2026 1:48 AM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).

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Dear Chair and Commissioners,

I am a resident of Pacifica, where I have lived for the past ten years with my wife and our two children, ages 9 and 3. I am writing to strongly **oppose Staff's recommendation to remove the Primary Residence requirement and the 60-night cap on unhosted Short-Term Rentals (STRs)** from Pacifica's Ordinance No. 901-C.S., as adopted by the Pacifica City Council. I urge the Commission to reject Staff's recommendation and certify the Ordinance as submitted by the City.

My family's safety is directly affected by unhosted STRs.

We chose our residential neighborhood specifically to raise our children. An unhosted STR near our home has a constant, high turnover of guests — the garage at this property has even been converted into an additional bedroom to accommodate more occupants. We regularly see cars driving the wrong way down our street and parking improperly. This is not an isolated situation: another full-house unhosted STR operates just two doors down from the house directly across from ours. The steady flow of strangers we do not know, combined with unsafe driving on our street, makes me genuinely worried about my children's safety when they play outside.

High winds compound the problem.

Pacifica sits near the beach, and we experience frequent, strong winds. Because unhosted STRs have no host present to manage the property, trash from these units is regularly blown into the street. I have personally had to clean up this trash myself on multiple occasions, simply because there is no one on site responsible for it.

The "affordability" argument Staff relies on works against its own conclusion.

Staff's report suggests that limiting unhosted STRs would reduce access for cost-conscious visitors. But an unhosted STR is only cheaper than a hotel room when a large number of guests split the cost of one property. That means the very thing that

makes an unhosted STR "affordable" is also what drives higher occupancy, more vehicles, more noise, and more turnover — the exact problems my family and neighbors experience. Staff cannot credibly use affordability as a reason to loosen these restrictions when that same affordability depends on the crowding that causes the harm.

Removing the 60-night cap makes STRs more profitable than long-term housing.

STR operators are driven by profit. If unhosted rentals are no longer capped at 60 nights per year, operating a property as an unhosted STR becomes more profitable than renting it to a long-term tenant. This directly incentivizes converting more of Pacifica's already-limited housing stock away from long-term residents. The cumulative effect of this kind of commercialization is being felt community-wide, through declining school enrollment, rising rents, and a shrinking supply of housing available to people who actually live and work here.

I support hosted STRs and I welcome visitors to Pacifica.

I want to be clear that I am not opposed to visitors or to short-term rentals in general. I fully support hosted STRs — true home-sharing, where an on-site host is present and accountable. Pacifica has welcomed visitors to our coast long before Airbnb and other STR platforms existed, and we will continue to do so. My concern is specifically with unhosted, investor-driven operations that convert full-time housing into unsupervised commercial lodging.

Conclusion

Pacifica's City Council spent years studying this issue, engaging both residents and STR operators, and crafting an ordinance that balances visitor access with the protection of our neighborhoods and housing stock. I fully support Ordinance No. 901-C.S. as adopted. I respectfully ask the Commission to reject Staff's recommended modifications and preserve both the Primary Residence requirement and the 60-night cap on unhosted STRs.

Thank you for your consideration.

Sincerely,
Haroldo Daltin
Pacifica, CA

From: [Randi Decker](#)
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Wednesday, August 5, 2026 11:21:08 PM

[You don't often get email from randidecker@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

As a long term resident of Pacifica and owner in the Sharp Park area it is very important for our community that there are strong limits on short term rentals in our community and that we continue to support the restrictions that the city and it's community members already decided - to set a maximum number of rental days and proof that the property is occupied and owned by a resident for the majority of the year.

I do not want our community subject to commercial interests that buy up our properties only to rent them out for high prices to short term visitors. We are a community here and these are our homes. Please honor the restrictions we have already overwhelmingly approved. Do not allow unlimited access to our coastal homes by commercial interests and short term rentals.

Thank you
Randi Decker

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: [Ringuette, Oceane@Coastal](mailto:Ringuette,Oceane@Coastal)
Subject: FW: Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Friday, August 7, 2026 4:46:32 PM

From: D Mi <pawzitively@yahoo.com>
Sent: Friday, August 7, 2026 4:38 PM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).

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To Whom It May Concern:

I am a resident of Pedro Point, Pacifica. I am writing to oppose the Coastal Commission (CC) staff's recommendation to remove the primary-residence requirement and the 60-night maximum limit on un-hosted short-term rental (STR) nights from Pacifica's STR ordinance.

As a person who lives in the vicinity of several houses that are being used exclusively as STRs, I have seen prior neighbors lose their rental homes because those residences were converted from homes into un-hosted hotels.

Not only has this switch displaced coastal residents, it has turned our neighborhood into one that resembles a hotel district, complete with a constant parade of faceless strangers, and the parking, partying, garbage and other issues that accompany such areas.

Because people have demonstrably been displaced by un-hosted STRs (I am not objecting to hosted STRs), I am at a loss to understand how staff can assert that there is no evidence that un-hosted STRs would revert to residences if they can no longer be utilized as full-time hotels. Of course they will. Most of Pedro Point is zoned residential, not commercial, thus, the homes would revert to their intended purposes once the owners of these un-hosted STRs are no longer able to use houses as hotels. The evidence provided by others on this issue supports this point. The evidence also shows that Pacifica is not San Francisco or other cities in which landlords buy houses purely for investment, allowing them to sit unoccupied for years. That simply does not happen here.

If the primary-residence and 60-night-cap requirements are removed from the STR ordinance, it will leave the coastal zone with zero protection against corporations and out-of-town residents buying valuable housing in the coastal zone for use as hotels, thus further reducing already scarce housing options for people who desire to live on — nor merely pass through — the coast. Again, others have submitted evidence to support these points. On the flip side, staff has presented no substantive evidence to support its unwarranted conclusions. Decisions made on conclusions rather than evidence are ripe for being overturned.

I understand that CC staff may have an issue with the city of Pacifica due to the flagrant ways in which the city has ignored the CC's directions and rules with respect to myriad other issues. I also understand that a desire to punish can inform decisions like this one (which defies logic and evidence and is contrary to decisions made in Half Moon Bay and elsewhere), but on *this* issue, the city *did* do the right thing and worked closely with the CC to develop a well-thought-out ordinance that balances CC considerations with resident and city considerations.

Indeed, CC staff has recognized the city's efforts in this regard.

Accordingly, I implore you to set aside any prior hard-feelings about Pacifica's prior conduct -- along with whatever else is driving staff's mystifying decisions -- and resolve this matter based on evidence, not on a desire to penalize or inexplicably selectively enforce standards, which shall only lead to lawsuits, not resolutions.

Thank you for your consideration.

Dina M.

Pedro Point resident

From: [Mary Ann Edson-Plumb](#)
To: [NorthCentralCoast@Coastal](#)
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Wednesday, August 5, 2026 1:26:04 PM

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Please reconsider and give Pacifica the same grace offered to other coastal cities for the control of Short Term Rentals. The ordinance the City is wanting to implement is already in place across the rest of the City. Short term rentals degrade neighborhoods, filling what should be housing for local workers, teachers, and emergency personnel. Pacifica has a large number of hotel rooms which are very rarely filled completely. There are plenty of places for coastal visitors to stay.

Thank you for your consideration.

Mary Ann Edson-Plumb
221 Roberts Rd
Pacifica, CA 94044

Sent from my Galaxy

From: [Ivan Elias](#)
To: [ExecutiveStaff@Coastal](#); [NorthCentralCoast@Coastal](#)
Cc: [ExecutiveStaff@Coastal](#); [Coastal Web](#); [Debra Rhodes](#)
Subject: URGENT: Protection against Short-Term-Rental's destruction in the Pacifica Coastal Zone
Date: Thursday, August 6, 2026 2:34:32 PM

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Dear Executive Staff, North Central Coast District Staff and California Coastal Commissioners,

Our family has lived in the Pedro Point community located in the Pacifica Coastal Zone west of Highway 1 since 2004. We strongly request the Commission follow the appropriate actions taken by the Pacifica City Council to enforce the following two key requirements for all Short-Term-Rentals (STR) in Pacifica: **primary residence requirement** and the **60-night cap** on whole-house, unhosted STRs.

Nearly a year ago, the Pacifica City Council agreed unanimously with Pacifica residents to implement these exact STR protections to safeguard our community's housing stock and neighborhood character. Thanks to these long overdue actions, our neighborhoods east of Highway 1 are protected by these two vital requirements. However, because of the current jurisdictional divide, the neighborhoods west of Highway 1 remain unprotected and continue to experience the destruction of our communities.

We strongly urge you to please be fair and take the right action to preserve our coastal communities. Without these basic protections, our neighborhoods west of Highway 1 will continue to displace long-term residents, erode our neighborhood fabric and compromise the residential character of our community.

It is incredibly difficult for any family to compete against profit-seeking-enterprises that turn our communities into decentralized hotel districts, pricing out the very people who work, live, and pay taxes in this city.

Voting against these two basic but vital protections is voting against long-term housing options for local workers, families, and renters. Further, without these two basic requirements, our residential neighborhoods will continue to be treated and seen as unregulated lodging zones.

We urge the Commission to respect the unanimous voice of the Pacifica City Council and its residents, and allow the primary residence requirement and 60-night cap for STRs located in the Pacifica Coastal Zone.

Thank you

Debbie Rhodes and Ivan Elias

1542 Grand Avenue, Pacifica, Ca

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: Ringuette, Oceane@Coastal
Subject: FW: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Friday, August 7, 2026 9:46:52 AM

From: Dian Emerson <dianemerson1@gmail.com>
Sent: Thursday, August 6, 2026 6:51 PM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).

You don't often get email from dianemerson1@gmail.com. [Learn why this is important](#)

Greetings:

I am a 45 year resident of Pacifica, and have lived in my current home for 40 years, a quiet cul-de-sac with mostly long term residents. For a period of slightly less than 2 years, the house across the street was operated as an unhosted STR, owned by a non-Pacifica entity. It was listed on VRBO and AirBNB. The house, with 4 bedrooms, was advertised as suitable for 16 persons. As a result, I have direct experience with all of the issues raised by the operation of an STR, and then some. My husband and I, and our neighbors, endured excessive noise and noisy parties, clogged parking, late night parades of Ubers coming and going, corporate retreats, baby showers, bachelor parties (complete with sex workers), construction crews and their oversize equipment, family reunions, yoga retreats, etc. Some were respectful of the quiet neighborhood, most were not. I am not aware that there were ever any repeat visitors. It was rented almost continually, and consistently on weekends and holidays. It was an absolute nightmare for us and our neighbors, and negatively affected our quality of life and enjoyment of our home. We were exceedingly fortunate that the STR operator did sell the property, and a lovely young couple moved in. They have recently had a baby and intend to make it their permanent home. I cannot begin to express what a difference this change has made to our life to have the house across the street occupied by a family again.

I am strongly in favor of the existing ordinance and implore the Commissioners to reject the changes proposed in the staff report. The ordinance presents a balanced set of requirements commonly found statewide and in coastal zone communities subject to the Commission's jurisdiction and approvals. It comports with prior Commission and staff guidance, and strikes the necessary balance regarding visitor-serving accommodations. The ordinance makes unhosted STRs subject to reasonable and rational limits and requirements to preserve neighborhood health, safety and sense of community. Critically, I want to also stress that the ordinance allows unlimited hosted STRs, which the Staff report seems to ignore.

We need the local resident requirement and the cap on rental nights for unhosted STRs. Our neighborhoods are fed up, and rightly so, with the use of residential housing on their streets by commercial, profit-driven unhosted short term rentals, i.e. hotels, owned and operated by out of the area investors. Importantly, it is the neighbors who must bear the brunt of the bad behavior, suffer sleepless nights, worry about their safety, and must now lock their doors and watch and listen for the unending string of cars, parties, and noise they did not ask for. As if

that is not enough, it is the neighbors who must shoulder the burden of initiating enforcement. The so-called “good neighbor” rules are not self-executing. Neighbors have to be willing to keep notes, take pictures or videos, and complain, complain, complain to the police department or code enforcement. As other Pacifica residents have noted in their statements, even that is not enough and is rarely, if ever, successful in preventing the next noisy weekend party with a different crew of visitors. Then, the complaint cycle must begin again. It is a tiring, frustrating, and often contentious activity to complain about visitor’s behavior from day to day, weekend to weekend, month after month. It can also be potentially dangerous, as verbal and other threats by STR partiers are not uncommon if they figure out who complained about their event and brought the police to their doorstep.

Neither the platform companies, nor the “operators” can prevent bad behavior by their customers. The local resident requirement and limit on rental nights is essential to provide local, community accountability for their commercial activities. Contrary to what the platform companies, or STR property owners profess, their chief interest is in the income their properties generate, not the impact of their business on the quiet enjoyment of Pacifica residents next door. Whether the renters of STRs are low, moderate or high income, the STR prices are “affordable” or not, or visitors are from the Central Valley, other parts of California, out of state, or anywhere else, there has been and will continue to be problem behaviors that fall directly upon nearby residents. STR users are “on vacation” and I can attest to the fact that they are in no way invested in the neighborhoods they disrupt while having a great time. After all, once they check out, they generally will never visit our street again.

I appreciate your time and consideration of the needs, desires and experience of Pacifica community members. I urge rejection of the proposed changes, and urge approval of the Pacifica ordinance and LCP.

Dian Emerson
Pacifica, CA
dianemerson1@gmail.com

From: [Barbara Erbacher](#)
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Wednesday, August 5, 2026 12:28:48 PM

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Please please do not change Pacifica's ordinance regarding short term rentals. The changes your staff propose would likely result in greatly increased housing costs and many more absentee landlords buying up sorely needed homes for residents. The current ordinance has been thoroughly vetted by local residents and officials and is helping to stabilize housing costs and neighborhoods.

Thank you for your consideration in this matter.
Barbara Erbacher
1322 Lerida Way, Pacifica.

Sent from my iPhone

From: ExecutiveStaff@Coastal
To: Ringuette, Oceane@Coastal
Subject: FW: Meeting on August 12, 2026, 9:00 am, agenda item 13.b – Local Coastal Programs (LCPs), City of Pacifica LCP Amendment No. LCP-2-PAC-0079-2 (Short Term Rentals)
Date: Monday, August 3, 2026 2:18:07 PM

From: Danny Estrella <warnella@hotmail.com>
Sent: Monday, August 3, 2026 2:09 PM
To: ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>
Subject: Meeting on August 12, 2026, 9:00 am, agenda item 13.b – Local Coastal Programs (LCPs), City of Pacifica LCP Amendment No. LCP-2-PAC-0079-2 (Short Term Rentals)

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03 August 2026

California Coastal Commission

Re: Meeting on August 12, 2026, 9:00 am, agenda item 13.b – Local Coastal Programs (LCPs), City of Pacifica LCP Amendment No. LCP-2-PAC-0079-2 (Short Term Rentals)

The California Coastal Commission (CCC) is proposing changes to the City of Pacifica's new short-term rental (STR) ordinance. The Pacifica City Council **unanimously** voted in the new STR ordinance for Pacifica nearly a year ago. The ordinance was the result of an eight-year-long community-wide discussion, with many City Council and City Planning Commission meetings with strong public input.

In February of 2026, the Coastal Commission scheduled the hearing for our ordinance, and the Commission's Staff report recommended approving the ordinance. The California Coastal Commission's staff has changed that recommendation and is recommending the removal of the two most important elements that protect our neighborhoods from the negative impacts of unchecked growth of short-term rentals: **primary residence requirement** and the **60-night cap on whole-house, unhosted STRs**.

Precedence for this requirement has been established: the Coastal Commission allows (1) Half Moon Bay to have a primary residence requirement and a 60-night unhosted cap. (2) San Francisco has a primary residence requirement and a 90-night unhosted cap. (3) Daly City has a primary residence requirement and a 100-night cap. (4) Santa Cruz has a moratorium on any new unhosted STRs.

I strongly oppose the Staff recommendation and ask the Commissioners to approve Pacifica's STR ordinance WITHOUT any amendments.

Respectfully,

Daniel Estrella
114 Kent Road
Pacifica, CA 94044

From: ExecutiveStaff@Coastal
To: [Ringuette, Oceane@Coastal](mailto:Ringuette_Oceane@Coastal)
Cc: NorthCentralCoast@Coastal
Subject: FW: City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals)
Date: Thursday, August 6, 2026 12:32:46 PM

From: Danny Estrella <warnella@hotmail.com>
Sent: Thursday, August 6, 2026 10:43 AM
To: ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>
Subject: City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals)

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29 January 2026

California Coastal Commission

Subject: City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals)

Dear California Coastal Commission Members,

I'm writing to urge you to approve Pacifica's short-term rental (STR) ordinance as it was approved by the Pacifica City Council.

Pacifica's STR ordinance does not deprive access to the California coast while protecting a high quality of life for coastal residents. When used as short term rentals (STRs), these homes are taken out of the hands of families who want to live in our City and are converted into businesses that are being allowed to operate in areas zoned as "residential." Neighborhoods are meant to house residents, not businesses.

Please note the effects of allowing STRs:

Defunds our schools

Our schools are funded on enrollment. Converting housing to hotels displaces families and reduces the funding of our schools. If we had just one child from half of the homes currently running as hotels that amounts to **a \$1,680,000 loss for our local schools.**

We wouldn't need to add more bond measures to the ballot to fund our schools if we had these students.

Depletes our teachers and first responders

Unhosted AirBnBs take long-term rentals off the market, and that drives up rents and home prices. **This makes it hard for Pacifica to recruit and retain teachers, firefighters, and police who cannot afford to live here.**

Unhosted AirBnBs take jobs

Local hotels employ reservation clerks, maintenance workers, housekeeping staff, and night clerks. These are predominantly middle and low-income jobs. Unhosted AirBnBs deplete worker hours and redirect revenue that would have gone to local hotels to property owners.

Please do the right thing by Pacifica and approve the current-approved STR

ordinance, which includes the types of restrictions other cities—including our sister-city, Half Moon Bay—have seen fit to apply, such as:

- **A primary residence requirement for any host operating an STR property;**
- **Only permitting one (1) STR to be owned/operated by any host within the City;**
- **An operating limit of 60 nights per year for any unhosted STR; and**
- **A limit of two (2) guests per bedroom and a limit of one (1) car permitted at the property per bedroom.**

Pacifica's residents, schools, and its neighborhoods are counting on you.

Respectfully,

Danny Estrella
114 Kent Road
Pacifica, CA 94044

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: Ringuette, Oceane@Coastal
Subject: FW: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Friday, August 7, 2026 3:33:57 PM

From: Shotsy Faust <shotsyfaust@icloud.com>
Sent: Friday, August 7, 2026 1:36 PM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).

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To CCC,

I am writing with dismay as to why the Coastal Commission would back the Air B n B leaders after such hard work by our community and City Council to try and protect our community from this manipulation. The regulations that apply to Half Moon Bay and the East side of Highway one were to apply to the West side as well. Now there is a plan to have no regulations, such as home ownership or 60m day limits to the West side. This is a ruse! and a money grab.

I understand the need for income for our town, and I am not anti short term rentals but there must be guardrails and guidelines to protect our community. This is not Malibu!! This is not a wealthy place, but a gorgeous area and community that should not be turned into a carnival.

Our community must be considered. With the regulations in place Air BnB would still be making money, but there would be some supervision of noise, length of stay and oversight by actual owners who live nearby or can respond to issues like upkeep etc. Owners who live out of state or another country are not readily available for these types of protections. This new ruling would make Beach boulevard more of loud party center than it already is without any protections.

Your documents try to push the idea of "affordability" to short term rent these homes for vacation purposes while pushing out long term renters who live there., It is not true that air bnb are more affordable . Look at the costs in the thousands of dollars to rent these for a week or long weekend. Our hotel rooms are still cheaper. You are not supporting our community. Just catering to the wealthy.

What is the CCC getting out of this? Something is fishy here!! Why were the short term company reps able to visit CCC and confer privately ? Did our community or City Council get the same treatment? What reason could the CCC have for having different rules for the East and West side of Highway 1? and Half Moon Bay. (Greedy people who are not from this community, is my guess, and big business having a say in our town and our Coasts future.)

SC Faust

Long time resident of Westview neighborhood and an advocate for our Pacifica Coast and Community

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: Ringuette, Oceane@Coastal
Subject: FW: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Friday, August 7, 2026 3:32:19 PM

From: Carol <cafregly@gmail.com>
Sent: Friday, August 7, 2026 1:26 PM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).

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Hello,

As a 30 year Pacifica resident, I strongly object to your apparent plan to weaken Pacifica's short-term rental (STR) ordinance.

Requiring that STR operators are primary residents and limiting the number of nights an unhosted, whole-house rental can be operated to 60 per year makes good common sense in light of the housing crisis in California.

These two elements of the ordinance will keep Pacifica homes available for people who genuinely want to become permanent members of our community.

Many Pacifica and San Mateo County residents cannot find permanent housing because so many owners and landlords choose instead to use them to generate more money on Airbnb or other STR websites.

We are facing a housing shortage because people who would love to be homeowners are being robbed of that opportunity by greedy buyers who often outbid locals and make full cash offers.

Many of these buyers do not live in the area, and they are not invested in the quality of life that they destroy with unhosted loud parties, excess trash, and disregard for neighbors.

Pacifica's STR regulations---for requiring operators to actually live in or near the homes they are renting out and limiting how many days per year those rentals can occur

inhosted---are steps in the direction of safe and sane oversight.

Sixty days allows a resident ample opportunity to leverage their residence for extra income from unhosted rentals and they can also operate hosted rentals 365 nights a year.

And there are other options. Many Bay Area hotels offer extended stay; private owners can choose to rent their homes month to month or for 3 months, 6 months, or one year.

My next door neighbor does exactly that and she has had lovely people staying in her house while they wait for their own homes to be remodeled or constructed. She lives down the block and she is always aware of what is happening on her property. She does background checks and has legal means to deal with damages and infractions should they occur.

Another major problem with the Wild West version of STRS in Pacifica is that large corporations have bought up multiple residences, some with five or six bedrooms and bathrooms, so the renters host large groups of people and the owners have no control over what they do.

If anything, the owners are not aware or concerned because they are not even in the area and the affected (and afflicted!) neighbors are left to deal with situations that often escalate.

Considering the limited inventory of available housing in our area, for every large "party" house that these corporate groups snatch up, there is one less house available to a growing family whose children would attend local schools, whose families would support the community, and whose presence would make our town more attractive to other families.

The preponderance of short term rentals must certainly have a major financial impact on the many hotels and motels in Pacifica whose proprietors invest enormous amounts of money to build, maintain, and expand their facilities, hire local residents, and partner with the community in many ways by supporting civic events.

What do owners of STRS do for the community? Their profits mostly go out of the area, sometimes out of the state or out of the country.

The conditions included in the ordinance as it was passed were in response to the very

real problems short-term rentals have created in our community. Among those, operators living in short-term rentals and a maximum sixty day rental limit are, at minimum, conditions that should be included in any STRS ordinance that attempts to protect everyone involved.

I will end this by adding a personal note. Recently, my credit card was compromised online and a product was purchased using my personal information but scheduled to be sent to a different address in Pacifica. After canceling my credit card and contacting the police, I went to the address. It was a short term rental. The policeman who took my report explained that this is a new fraud scheme.

Apparently, crooks look online for an STRS that is not booked, make a purchase for a minimal amount on someone's credit card, and have it sent to the vacant STRS. If the first purchase goes through, and the credit card holder doesn't notice, the crooks proceed to max out the credit card. Criminal activity also includes shipping illegally purchased merchandise or contraband to a vacant STRS and having it picked up there.

If anyone needs further proof that long-term residency is better for community stability than poorly regulated and monitored short-term rentals, there it is.

Regulations are indeed in order, and unless a locally owned mom and pop STRS is actually helping someone pay the bills by renting out a room or an attached apartment, STRS are not good for communities. And that is why they have been reined in by so many other cities around the world.

Please help us protect our community on the coast by allowing our local governing bodies and our residents to set the standards for STRS in Pacifica.

Respectfully,

Carol Fregly
727 Rockaway Beach Avenue
Pacifica, CA 94044

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: Ringuette, Oceane@Coastal
Subject: FW: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Friday, August 7, 2026 10:04:22 AM

From: Gary Furlong <garyisanalien@gmail.com>
Sent: Thursday, August 6, 2026 8:58 PM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).

You don't often get email from garyisanalien@gmail.com. [Learn why this is important](#)

Commissioners,

I am writing to you in regards to City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).

The city of Pacifica has spent an enormous amount of time and energy seeking input for the rewriting of the ordinance governing Short Term Rentals (STRs) within the city limits. I myself have attended countless meetings about this revision: City Council meetings, Study Sessions, and even general public sessions held outside of the City Council chambers. I have personally listened to hundreds, if not thousands, of public comments made at these meetings; I have read hundreds of letters that have been sent in to the City and to the California Coastal Commission over the years. To put in it perspective, during the time that this discussion has been on-going a tiny Monterey Cyprus sapling would have grown to almost 20 feet tall. Years and years have been devoted to this effort. It is neither sudden nor unexpected. As your own staff has noted, our revised ordinance is extremely detailed; that is because almost every single word was discussed, debated and considered after untold hours of public input and council deliberations. In the past the Commission has given weight to those ordinances that have been carefully considered and include a tremendous amount of public input in their crafting; this is one such ordinance.

I would point out that just a few months ago the Commission staff recommended accepting this ordinance in its entirety. It is now proposing ripping the heart out of the ordinance. This would make sense if there was new legal precedence to consider but there is none. It would make sense it if could be shown that this ordinance is the result of lack of community input, but that is obviously not the case.

Some interesting points have been advanced to justify this change in their recommendation. One point that is raised is that "...the City's data does not show how the proposed STR restrictions would create additional longer term housing opportunities..." (see footnote 1, below, for the full quote). I am an investor. I have read this sentence, and the paragraph it comes from, probably 30 or 40 times and have shared it with numerous other people who invest because every time I read it I am amazed at what is being said. If an investor buys a house to make money, which is what investors do, if it becomes impossible to make money from that house by using it as a mini-hotel, they will find some other way to make money from it. The only legal alternatives are either to rent it out long term or sell it. To suggest that an investor would buy a property to use as any form of rental and then would let that property sit empty is, well, ludicrous. We are seeing right now in Pacifica are full time, unhosted STRs once again become long-term rentals or are being sold to once again become homes. To my knowledge, not one single one of them sits empty for longer than it takes to rent it long-term or sell it.

The staff report also indicates that there is nothing that indicates that STRs drive up home prices. I have listened numerous people tell of bidding for home after home only to be out bid and then find out later that the people who bought the house turned it into a full time STR. It's a basic rule of capitalism: competition drives up prices, this isn't rocket science. You have affluent investors buying up homes to make them into hotels, homes that should be bought by young couples. Our police officers, our fire fighters, our grocery store workers, our restaurant staff should not be competing against investors to buy a house.

The staff report raises concerns that the new ordinance will drive down the number of STRs that are available. There is no denying that the STRs that are subject to the new ordinance are going through a shake out period. Why? For the first time they are subject to clauses that require them to adhere to health and safety standards as well as "good neighbor" standards. No more are STR investors allowed to buy a three bedroom house and advertise it as a micro-hotel holding up to 20 overnight guests (yes, that is a real example). Do you remember the MV Conception disaster, where a dive boat caught fire and 34 people were trapped below decks and died? Pacifica has wisely taken steps to avoid having an STR version of that. So of course we're going through a shake out period, but that will pass.

The staff report raises concerns about the lack of available lodging in Pacifica. Every single hosted STR will have the right to be unhosted for up to 60 nights a year; that's two

months out of twelve, if taken all at once. Realistically people that want to find a whole house rental will find one because there will be plenty of hosted STR owners that will take advantage of this. I would also point out that according to an update that I recently received, the city of Pacifica has three different hotel projects in the works to add to its existing hotel stock; it is my hope that when these come before the Commission they will green light these projects quickly.

Apparently there has been some discussion about whether or not the new ordinance violates the commerce clause. Pacifica's revised ordinance was specifically written to avoid this violation and a letter has been sent to the the Commission attesting to this.

I have lived in my house in Pacifica for 26 years. My husband has lived here for 40 years. We live in one of the coastal neighborhoods most impacted by unhosted STRs and I will personally tell you that it has changed our neighborhood for the worse, significantly. We now have micro-hotels located throughout our RESIDENTIAL neighborhood. Does it not matter to the Commission that if you do not pass our ordinance as written that you are going to be responsible for gutting our neighborhoods? Some people would say that micro-hotels are cheaper; in my neighborhood many of them rent out for \$1,000 per night or more. Of course it is cheaper per person if you then shove 20 people into a three bedroom house; screw the neighborhood.

I have read the letters from owners of unhosted STRs where they quote from some of their guests who are commenting on how wonderful their stay at the mini hotel was. However, over these last few years as this revision has been worked on, I have listened to homeowner after homeowner recount their horror stories about living next to these micro-hotels. When one man was recounting his story I was seriously concerned that he would have a heart attack, he was that emotional. I have literally seen men and women break down crying as they recount the stories from their lives living next door to a micro-hotel in their residential neighborhood. Every single one of these people have one thing in common: they are each and every one a Californian and they deserve to be treated better than this.

I hope you will pass Pacifica's revised STR ordinance as it was presented to you and let us reclaim our neighborhoods for neighbors!

Regards,
Gary Furlong

1. "As it relates to the broader issue of housing availability, the relationship between

STRs and housing can be quite complex, and there does not appear to be an either/or distinction between allowing an STR versus using that home for longer term housing. In this case, the City's data does not show how the proposed STR restrictions would create additional longer term housing opportunities, especially affordable housing, which is the type of housing protected by the LUP. Additionally, there is not a mechanism to mandate or assure that property owners will rent or sell their properties for longer term residential use if they can't pursue STRs, and there is currently no evidence to suggest that the housing stock in question would be affordable if it were converted to permanent housing. Therefore, there is no substantive basis for concluding that the proposed STR regulations will meaningfully improve the availability of housing stock in the coastal zone in Pacifica, particularly for low and moderate cost housing" (Staff Recommendations, pg 2-3).

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: Ringuette, Oceane@Coastal
Subject: FW: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals)
Date: Friday, August 7, 2026 4:46:44 PM

From: Gary Furlong <garyisanalien@gmail.com>
Sent: Friday, August 7, 2026 4:41 PM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals)

You don't often get email from garyisanalien@gmail.com. [Learn why this is important](#)

Chair Harmon and Honorable California Coastal Commission Members,

In regards to the new Short Term Rental (STR) ordinance that Pacifica is asking you to approve without changes I would like you to contemplate two different scenarios.

SCENARIO 1

A teacher, a fire fighter and a couple who both work in retail are all looking for a house so that they can have a home and start building equity. They all find the same house in a cute neighborhood that is known for being welcoming and social (mine!). None of these people can afford this house on their income, however, they have heard about Pacifica's new STR ordinance and plan to make use of it so that they can not only have a home but also start building equity, which will help to support them in their old age. One of these couples eventually buys the house. They look at their calendar and mark out the dates that they normally are gone: a ten day vacation to visit family every year, every long holiday weekend, a week over Thanksgiving, etc. They then go to one of the STR companies and list their house as a full time unhosted STR during those time periods because they know they can have an unhosted STR up to 60 nights per year. They also decide to list their legal garage conversion and their other spare bedroom as a hosted STR for the entire year. In this scenario this house is literally never sitting vacant but is in use 100% of the time. This couple in the service sector of the workforce who normally would not be able to afford a house are now building equity, have a stable home life and are helping to bring visitors to the coast.

SCENARIO 2

An investor is looking to increase their profit and eventually they hear about the very significant profit margins of the full-time unhosted STR market. They hear that the

coastal area of Pacifica has few STR restrictions and, in particular, there are no restrictions on the number of unhosted nights that an STR is allowed because the CCC overruled Pacifica's ordinance that had that restriction. They want to be sure to find an attractive property so they look around to find the cutest neighborhood possible, preferably one that is known for being social and neighborly (mine!) and they find a house that is for sale. Of course there are three others that are making offers on the house: one is school teacher, one is a police officer, and the other is a couple who both work in retail. Since the investor is looking to have the house pay for itself they can easily afford to out bid the others for the house and thus it becomes a full time, unhosted STR that sits empty more than 50% of the time. The rest of the time the going rate is right around \$1,000 per night for the unhosted STR (again, my neighborhood! - GF). Now that cute neighborhood isn't so cute because it has a never ending parade of strangers next door instead of neighbors. These strangers are there to party and there is now a house that sits empty more often than it is used. And due to the competition the investor brought into the area, housing prices have now gone up even more and are now less likely to be purchased by people in the service sector.

Commissioners: it is literally up to you which of these scenarios will play out in the coastal zone of Pacifica, including in my neighborhood where I have lived for 26 years and my spouse has lived for 40 years. I urge to you approve the Pacifica STR ordinance as it is written and put a cap on unhosted STR nights so that instead of greedy investors we have hard working families who provide needed services to our coastal area.

Regards,
Gary Furlong

From: [Peter C Garenani](#)
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Friday, August 7, 2026 6:07:18 PM

You don't often get email from pgarenani@hotmail.com. [Learn why this is important](#)

Dear Chair Harmon and Honorable California Coastal Commission Members,

I am a 10-year resident of Pacifica, and am writing to you state **that I strongly oppose the commission staff's recommendation to remove** from the Pacifica's STR Ordinance the primary residence requirements and the 60-night max on unhosted STR rental nights.

Please vote to support the Pacifica STR Ordinance as is—which aligns with countless California cities—and which you indicated you fully supported as recently as January of 2026.

When my partner and I moved to Pacifica, we fell in love with the stormy, overcast, cold weather, and seaside community, which reminded us of Ireland.

When we moved here, colleagues “warned” us that Pacifica is “working class” and they even disparaged it by its local moniker “Blue collar Malibu”. But we didn’t listen; we loved the town, its residents, and the community’s unique charm.

And we bought our first house in Pacifica, after working **2 jobs for 20+ years** and **saving money for more than 30 years**.

Which is why I find the staff’s report so disturbing—laughable—in characterizing Pacifica among the “white, wealthy” coastal communities. Either the staff has never stepped foot in Pacifica, is unaware of its working-class socioeconomic status, or just copied their “conclusions” and talking points from the Airbnb agents that the staff has liaised with for at least 6 months.

Also note: in the *exparte* document, the staff attempts to bury the Airbnb connection lower in the list, and incorrectly states that they also consulted with PHANH. This is a falsehood; no representative from PHANH had a meeting with the staff, although a meeting was requested.

The staff's report bleeds Airbnb talking points, and the phrases used by the staff so closely resemble them as to be plagiarism: ‘...*those not fortunate enough to live in Pacifica...*’

Backtrace that gem, and you’ll find it appears in documents from Pacifica for Responsible Tourism and their overlords: the Airbnb agents. And that’s just one example.

The report is deeply flawed and one-sided, not only in its talking points, but also in its “logical” conclusions.

1. Logical fallacy 1: There will be a loss in nights for visitors to stay.
In fact, unhosted STRs that are available for rent 365 nights per year, are **also available for rent 365 nights per year when they are HOSTED by a primary resident**.

The staff's fear mongering that there will be a dramatic decline in nights for economically disadvantaged seeking the coast **is not supported by either basic logic, or basic algebra.**

2. "Unhosted STRs offer affordable housing." This is another falsehood. The unhosted STR next to my home, owned and operated by the Marbella Lane Corporation, typically charges thousands of dollars for a mandatory minimum 3-night stay. There are multiple fees: the room fee, booking fee, cleaning fee, if applicable, pet fees, etc. That is not "affordable"—certainly not when compared to the local hotel costs per night.
3. Unless the 'economically disadvantaged' are going to pack 10, 15, 20 people into a 2- and 3-bedroom STR to split the thousands of dollars in fees, the rates that unhosted STRs charge are absolutely not affordable. And packing so many people into a home is a fire hazard. It also **overstresses limited city infrastructure: sewer, water, power... and police presence**, when the house packing is yet another unhosted STR party house.
4. It is insulting that the staff dismissed this reality out of hand in—yet another—Airbnb talking point, to paraphrase the staff report, that whether an STR is affordable is argued from both sides and is inconclusive.
5. If the CCC staff is genuinely concerned about affordable visitor housing in the Coastal Zone, the solution is obvious: **insist that STRs in the coastal zone cannot charge more than, say, \$50 per room per night, and no additional booking, cleaning or other fees or taxes.**
Or insist that STRs MUST charge 40% under hotel market pricing.
6. Logical fallacy 2: The staff concludes that there is "...no evidence to suggest that the housing stock in question is affordable even should it be converted to permanent housing."

First, yes, there is data that many properties in the Pacifica non-coastal zone have become long-term rentals, or been purchased by families.

Additionally, the staff seems unaware that many (all?) of the current unhosted STRs were previously affordable housing. For example: four apartments on our street were converted to unhosted STRs, when the tenants were displaced.

We know half a dozen residents (now, sadly, many are *former* Pacifica residents, due to housing costs) who were displaced from their apartments when the landlords switched the housing units to be unhosted STRs. Some of those displaced were senior citizens.

The very fact that they had been living in those units—many, for years--suggests that those renters found the apartments to be affordable housing. But when so many landlords convert their (long-term) apartments to short-term rentals (unhosted STRs), this in turn drives the prices up for the remaining apartments.

The unhosted STR next to us was previously a family home with a renter on the bottom floor — i.e., 'affordable' for all parties involved.

7. The staff seems to believe that we live in a world where everyone follows the rules, especially those rules around public safety and nuisance behavior. The premise is laughable.

The reality: when you live next to one of these unlicensed, largely unregulated hotels (unhosted STRs), the customers change every 3 days. That means:

1. A revolving door of strangers who, in 2 clicks of their keyboard, know who you are, but whom you don't know anything about. Community Watch programs—designed for public safety-- go out the window.
2. Many unhosted STR renters indicate they have not read the house rules; others—probably emboldened by the astronomical costs they are paying—declare publicly ‘that we’ve read the rules but they won’t be following...’ this rule or the other.
3. Trespassing, loud noise outside quiet hours, smoking on property, illegal dumping—Gosh! It’s great to be on vacation where the locals don’t know who you are.

Rarely are the customers courteous and accommodating when asked to follow the house rules. More often, our polite request is met with cursing, name calling, threatening words, threatening gestures, and threatening behaviors.

One New Year’s holiday, we had to leave our home and escape to a hotel because a renter at Marbella Lane’s unhosted STR next door was so verbally aggressive that my very ill partner was afraid to stay in her own home. The neighbor on the other side of the unhosted STR reported to us that this man had thrown a cup of coffee at her granddaughter when she asked him to stop trespassing.

I can go on: we have 12 pages, single spaced, of incidents with the often-problematic renters at the unhosted STR hotel next door.

The lack of accountability on the part of remote, unhosted STR owners is notorious: party houses, public urination by renters, public vomiting by renters, noise, trash, and trespassing complaints. One can go on and on. Unhosted STR owners all claim **their** property is angelic—okay, but then why are there so many Pacificans complaining about the unhosted STR near them?

This is why Pacifica needs the primary resident requirement and 60 night unhosted cap in its ordinance.

One Christmas, the Pacific Police came to our door and asked if we knew anything about “any activities involving children and drugs” at the unhosted STR next door.

Another time, a renter at the unhosted STR trespassed onto our property and vandalized our security cameras, leading to a police criminal case being opened. Marbella Lane, the owner/operator of the STR next door, was informed--and allowed the customer to stay another 6 days!

And that is the central issue. When a corporation is allowed to operate in an area zoned for residential properties, the surrounding neighbors instantly lose their quality of life and their neighborhood’s unique characteristics.

The right to be safe and feel secure in your home. The right to the quiet enjoyment of your home. The right to not be awakened at 1am, 2 am, 3 am, 4 am, 5 am in the morning by people “checking in and out” of the hotel/unhosted STR next door.

And the right to know if a sex offender, or other criminal is staying in the unhosted STR next door. The right to have a “hotel” operating near you which is accountable to local fire codes (fire doors, alarms, bells/horns, strobes, exit plan signs on doors, etc.), security/public safety and other building codes, **including being ADA compliant.**

Hotels are required to follow these rules—why are unhosted STRs given a “pass”?

Community Watch and “See Something-Say Something” programs become ineffective when a new group of strangers appears via a revolving door every 3 days.

The residents of Pacifica have worked with multiple city councils, multiple city staffs and, through our staff, with the CCC for 8 years in an attempt to find an appropriate balance between visitor accommodations and protecting our neighborhoods from commercialization.

And to put the burden of accountability around nuisance, safety, and other community issues back where it belongs: on the unhosted STR owners.

The primary resident and 60 day unhosted cap are the “teeth and bite” YOU, the Commissioners, directed Pacifica toward. Please don’t take that away from us now.

Thank you for your consideration.

Peter Garenani

From: [Joanne Gold](#)
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Thursday, August 6, 2026 12:30:38 PM
Attachments: [Pacifica Airbnb.png](#)
[Pacifica VRBO.png](#)

Dear Chair and Commissioners,

I am a Pacifica resident who has lived in the Pedro Point neighborhood within the coastal zone since 1999. I am writing to respectfully urge the Commission to approve the City of Pacifica's Local Coastal Program Amendment (Short Term Rental Ordinance) as-is, and to **reject staff's recommendation to modify it** by removing the primary residence requirement and 60-night annual cap on unhosted short-term rentals.

The City spent years developing these regulations through extensive public hearings, careful analysis, and significant community input. The resulting common-sense ordinance represents a thoughtful balance between supporting public access and visitor serving accommodations while also supporting Pacifica's neighborhoods and full time residents.

The staff report repeatedly emphasizes the importance of achieving "balance." I agree. **However, the City has already achieved that balance!**

The staff recommendation rests on the premise that removing these two provisions would improve coastal access, particularly for lower and moderate-income visitors and underserved communities. Yet there is no evidence that eliminating the primary residence requirement or the 60-night cap would accomplish that goal.

The average daily market rate for an entire-home Airbnb or VRBO rental in Pacifica is roughly \$320 - \$340/night. Adding on the cleaning fees and mandatory booking/platform fees, taxes and TOT charges brings the average daily rate to \$425 - \$450. And higher still for larger 4 - 5+ bedroom homes. Furthermore, most unhosted STRs require multiple night stays, pushing the costs into thousands of dollars*. **These whole-house vacation rentals are simply not "lower-cost" accommodations by any reasonable definition.**

Removing the two most critical safeguards against continued neighborhood commercialization from the City's ordinance **would not create more affordable coastal access**. Instead, it would:

- Encourage increased speculative investment by absentee owners, out-of-town investors, and for-profit corporations
- Convert more residential housing for use as year-round, high price vacation rentals
- Turn our neighborhoods into de facto commercial hotel districts

Equally important, Pacifica's ordinance reflects exactly the balanced approach prioritized by the Commission, and already represents a significant accommodation for visitor-serving uses.

The Commission approved a citywide cap of 150 STRs in 2024, and the current ordinance retains that cap while continuing to allow hosted rentals without **ANY** annual limits. These are hardly prohibitions on coastal access. They are reasonable, common-sense measures adopted after years of local deliberation and extensive public participation.

Replacing carefully considered local policy with unsupported assumptions about affordability risks undermines precisely the balanced approach the staff report says it seeks to achieve.

For these reasons, I respectfully request that the Commission reject the proposed modifications eliminating the primary residence requirement and the 60-night limit on unhosted short-term rentals, and instead certify the City's ordinance as adopted.

Thank you for your consideration.

Respectfully,

Joanne Gold
251 Stanley Avenue
Pacifica, CA

*See photos attached from recent searches on Airbnb and VRBO using randomly selected dates showing rates for whole house rentals in Pacifica.

5:00

5G

Vrbo

Get the...



Pedro Point, Pacifica, California, United...

Oct 16-Oct 23 4 guests



Price

House

Hot tub

Waterfront

How our sort order and personalized savings work



9 min walk to the beach

Huge and comfortable house with gorgeous view and jus...

House · 5 bedrooms ·

4 bathrooms · 9 beds

Free cancellation until Sep 16

9.8 Exceptional

95 reviews

Weekly stay \$463 off

~~\$786~~ **\$720**

\$5,038 for 7 nights

All fees included



12 min walk to the beach

Hot Tub Overlooking Ocean!

House · 2 bedrooms ·

2 bathrooms · 3 beds

Free cancellation until Oct 2

8.0 Very Good

2 reviews

Weekly stay \$460 off

~~\$790~~ **\$724**

\$5,071 for 7 nights

All fees included



Map

We don't have any more available

From: [Cheryl Greene](#)
To: NorthCentralCoast@Coastal
Subject: 13b - STRs in Pacifica
Date: Wednesday, August 5, 2026 10:26:24 PM

You don't often get email from cheryl.greene@gmail.com. [Learn why this is important](#)

Dear Commissioners,

My husband and I have been residents of Pacifica for 8 years. We live in West Sharp Park.

Last week my husband and I took our adult kids, their partners, and our four grand children to Hawaii. We went to a family resort on the beach. We were delighted to hear squealing children, families laughing, and late night cajoling around the firepit. It was striking how different that resort is from our neighborhood -- a community built not for vacationing, but for living.

I believe everyone should have access to the beauty of the coast. I believe the Pacifica Pier should be repaired or rebuilt to provide access to the ocean, I believe we should approve and fund the beautiful planned public walk ways along the ocean in Sharp Park, I endorse our local hotels that provide vacation lodging, but I don't support unhosted STRs that are operated by non-Pacifica residents.

Please vote with the community of Pacifica to restrict unhosted STR rentals to 60 nights per year. Please vote with the people of Pacifica to limit ownership of STRs to Pacifica residents.

We can provide coastal access without disrupting communities. Pacifica was built to be a place where people live, not a resort where people just vacation and leave.

C~

Cheryl Greene
West Sharp Park Resident
925-639-5517 Cell

From: ExecutiveStaff@Coastal
To: Ringuette, Oceane@Coastal
Subject: FW: Public Comment on August 2026 Agenda Item Wednesday 6b - Commission Correspondence
Date: Thursday, August 6, 2026 12:56:48 PM

From: Mrs. Hagler-Wong <mrshaglerwong@gmail.com>
Sent: Wednesday, August 5, 2026 6:29 AM
To: ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>
Subject: Public Comment on August 2026 Agenda Item Wednesday 6b - Commission Correspondence

You don't often get email from mrshaglerwong@gmail.com. [Learn why this is important](#)

We are asking you **NOT to delete the residency and 60 day per year requirements**, to assure those of us who live here that properties will not be bought up by foreign investors for Airbnbs, etc. This affects the quality of life for all residents. Not sure why this is even an issue. The CCC usually has the best interests of the coast and coastsiders. Please let this still be the case.

Thank you.

Sincerely,

Deborah . Wong

Michael A. Wong

72 San Jose Avenue

Pacifica,

CA. 94044

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: Ringuette, Oceane@Coastal
Subject: FW: 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals)
Date: Friday, August 7, 2026 3:37:01 PM

From: Jen Hansen <blondie7317@hotmail.com>
Sent: Friday, August 7, 2026 3:05 PM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals)

You don't often get email from blondie7317@hotmail.com. [Learn why this is important](#)

resending as others have reported issues sending emails through the website and I forgot to include a picture anyway)

Good afternoon, Commissioners,

I'm sure you have gotten many emails regarding 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals), so I will keep this as brief as possible.

1.) Approving the ordinance as written **returns much needed housing stock** back to the community and hopefully increases enrollment in our local public schools.

2.) We have already seen many unhosted STR's outside the costal zone being sold or converted into long term rentals, restoring the sense of community that advocates were seeking when pushing to have the STR ordinances amended.

3.) Most of the units the residency requirement would impact are zoned as single family residences, meaning they are **not zoned for commercial because they generate regular income**.

4.) While I support the property rights of owners, my support ends when the property owners infringe upon their neighbor's right to the peaceful enjoyment of their home. Neighbors should not be subjected to people trespassing on their property, having to walk half a block home because parking has been consumed by STR guests, and loud disturbances including, but not limited to, loud parties, people drinking and listening to music in hot tubs, police activity (in one circumstance, my understanding was there was a drug and child endangerment issue), and the filming of adult movies. (Continued in #4)

5.) While the adoption of STR ordinances was a result the changing times, the council could

not have foreseen the **unintended consequences** STR's would have on the neighbors, Pacifica's sense of community, and impact on city resources. Personally, I live 3 doors down from an unheated STR and we've had bachelorette parties, fraternity parties, quinceañeras, baby showers, corporate retreats, religious retreats and even A BAND that walked down Crespi with a group of 22 people playing instruments and holding sheet music! We frequently encounter trash blowing down the streets after wildlife raided overflowing trash/compost/recycling receptacles that were left in front of the property. With the new ordinances, the company has since sold the house to a wonderful family whose teenage son attends our local high school. They also have dogs so we chat with them often while out on walks.

6.) The CCC has **already approved these amendments** in other cities, most recently, the next city over, Half Moon Bay.

While I could go on and on, I value your time, so will stop there.

I was part of a large group that came together because we were all witnessing the same situations across the city. I've spent the last 4 years collecting data, researching ordinances in similar cities in California, attending city council meetings, and communicating with various community members to build something that brings the peace and sense of community back to the town that I have lived in since I was born in 1983.

Please vote to approve Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals) as written.

In Collaboration,

Jen Hansen
Linda Mar



WYZE

2022-06-17 20:31:35

From: [Sheila Harman](#)
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Thursday, August 6, 2026 12:17:34 PM

You don't often get email from sheilafromny@gmail.com. [Learn why this is important](#)

Dear Commissioners,

I am writing to express my concerns regarding the proposed changes to short-term rentals (STRs) on the west side of Highway 1 in Pacifica. Implementing distinct rules as suggested by the CCC for this area will create inequities, divide the city, and complicate enforcement.

Pacifica needs a universal STR plan that applies equally to both sides of the highway. Applying different standards suggests that the negative impacts of STRs—such as the breakdown of neighborhood connections, party and parking disruptions, and a shortage of long-term rental units for families and workers—are acceptable in certain areas but not others.

While tax paying residents should have the opportunity to earn income and support tourism through short-term rentals, guardrails are necessary to preserve our neighborhoods.

Implementing limits on the number of rentable units per property and requiring owner occupancy or a six-month residency minimum would provide these necessary protections. Furthermore, fair regulations should feature simple monitoring mechanisms that do not rely on neighbors to report issues. Without effective oversight, it will become too lucrative for property owners to convert homes into STRs, which drives up rent prices without adding affordable housing.

Therefore, I recommend that the city do not amend the already approved ordinances. Allowing STRs without a 60-day limit will encourage owners to rent to the highest bidder, pricing out long-term residents. If additional accommodation is needed for tourism, we should look to utilize existing commercial spaces rather than dismantling residential housing.

Thank you for your time and consideration.

Best regards,

Sheila Harman

From: [Gregory Hirsch](#)
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Thursday, August 6, 2026 1:19:16 PM

You don't often get email from graviton99@gmail.com. [Learn why this is important](#)

Dear Commissioners,

I moved to Pacifica in 1985 from Berkeley, where I initially lived in an apartment in Sharp Park while commuting to Palo Alto to work in scientific research. Coming home to a great community by the ocean was completely enriching. Eventually I got married and we moved into a small house in Linda Mar while building our dream home on Pedro Point over several years. We moved into this house in 2001. Between the natural beauty of the neighborhood, and especially the amazing collection of incredibly interesting, accomplished, and kind neighbors that have become very close friends, we couldn't imagine a nicer place to live ANYWHERE. Pedro Point was for many years a true paradise that we considered so lucky to be living in every day.

Most regrettably, the luster of this wonderful neighborhood has been significantly despoiled by the growing cancer of unhosted STRs. They have increasingly transformed our unique neighborhood into an annoying hotel zone. Houses that used to be homes of great neighbors have increasingly been transformed into de facto mini-hotels; all too often frequented by those with absolutely no respect for this special place. The usual litany of problems has caused a significant reduction in the quality of life here. Olympian Way has become especially dangerous due to our narrow, windy, and bumpy street being driven recklessly by visitors (sometimes inebriated) like an expressway.

While I have mixed feelings about STRs in our neighborhood in general, I understand that they can be a welcome source of income. In fact, one of our neighbors is a medical doctor who uses STR revenue to support much needed medical assistance in her country of origin. This is certainly very admirable, and in sharp contrast to out-of-town opportunists snapping up homes that should be the homes of real neighbors. Instead, we increasingly have remotely run hotel and event-center businesses on our quiet streets. The operating word here is "hosted". With a homeowner living on the premises to monitor the behavior of guests, much of the horror of these unhosted STRs could be avoided. This was of course the original business model of operations like Airbnb. Sadly, it morphed into the current model of sheer corporate greed by outside interests to transform residential neighborhoods into commercial areas that attract all too many people looking to do whatever they want without restraint. I honestly don't understand how this whole situation is permitted to exist in residentially zoned neighborhoods. At least with real hotels, employees are required to be present to control the premises.

It is my perception that Pacifica seems to be getting significantly different treatment from the Commission than other nearby cities with the proposed changes to this plan. This is extremely perplexing and vexing. Why must we suffer a lower quality of life in Pacifica west of Hwy 1 than our residents just south of us in the Half Moon Bay area for instance? It would note there has been what I consider a somewhat analogous situation with the Pacifica State Beach parking lot adjacent to Pedro Point. Just like with the proliferation of unmonitored mini-hotels lining our streets, an uncontrolled "wild west" situation was allowed to fester in this parking lot. Unlike virtually every other

State Beach I am familiar with, the lot was not permitted to close at night despite pleading from the city. Predictably, a community of RV squatters moved into the lot, with some living there for years. It took a recent incident involving firearms to change (temporarily) the situation. For some reason, Pacifica is seemingly forced to endure exceptions to rules to control situations that bring problematic people to our community. I keep asking the simple question "Why here?"

I respectfully ask that CCC honor the original terms of the agreement that the city wrote to limit these businesses to hosted STRs. A huge amount of effort and time went into the writing of this document. Many of us are completely dismayed that key provisions of this agreement regarding unhosted STRs have been gutted for those of us living west of Hwy 1. Looking at some of the letters already submitted, there is clearly a very powerful group of outside corporate interests trying to continue turning our neighborhoods into nothing more than a commodity of empty homes with lockboxes to be exploited. While their presentations are very slickly put together by professional lobbyists, they are nothing more than corporate pitches to make huge profits at our expense. It is important to note that any agreement to limit unhosted STRs to only one per owner would be an easily defeated farce.

We desire that our Pacifica neighborhoods be allowed to return to some semblance of what they used to be before this industry showed up and defiled them. I suspect few of the individuals running STR operations would be willing to put up with what we have endured for years in their own neighborhoods. Of course, that is almost certainly a moot point as few jurisdictions would permit it. Increasingly, cities are simply banning ALL STRs. A simple question to the Commissioners is: how would you act if you were in our situation? Thank you for your consideration of this matter.

Respectfully,

Gregory Hirsch

Olympian Way

CALIFORNIA COASTAL COMMISSION

August 12, 2026

Agenda Item W13b

City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2

WRITTEN COMMENTS OF JIM HOLTZ

RESPONSE TO COMMENTS SUPPORTING PACIFICA'S PRIMARY-RESIDENCE, 60-NIGHT, AND MULTIFAMILY HOSTED-ONLY RESTRICTIONS

Dear Chair and Commissioners:

SUMMARY AND REQUEST

I am a Coastal Zone short-term rental owner and operator in Hermosa Beach.

I began hosting in 2010 and have managed an estimated **765 stays of 30 days or less**, including STR stays before Hermosa Beach's blanket residential STR ban took effect in 2016, 30-day rentals while that ban was enforced, and shorter stays again after the legal landscape changed.

The ban was later [ruled unenforceable in the Coastal Zone on March 26, 2026](#).

During the intervening ban, I limited my rentals to stays of 30 consecutive days.

What distinguishes my perspective from activist research on either side of this issue is extensive firsthand experience as both an STR operator and an STR neighbor.

For six years, I lived in the same six-unit condominium building as four other STRs, adjacent to two more STRs immediately to the north, and near a three-unit STR triplex located one building south and another one building east of mine.

I also knew of at least seven additional STRs farther up and down my block, **for a total of at least 16 known STRs within one block of my front door**.

Based on my estimate that each STR averaged seven renter groups per month for 11 months of each year, the nine STRs in and immediately around my building hosted **approximately 4,200 renter groups** during those six years.

The 16 known STRs on my block hosted an **estimated 7,400 renter groups**.

Pacifica and Hermosa Beach are distinct coastal communities, and Pacifica deserves analysis based on its own circumstances.

My experience managing an estimated 765 stays in my Coastal Zone STR and living among thousands of stays at numerous neighboring STRs provides a **substantial firsthand understanding** of how STRs actually operate and affect their neighbors.

I also live in a San Pedro neighborhood without STRs for the past ten years, which gives me a direct comparison with ordinary residential noise, parking, gatherings, and nuisance issues that occur from ordinary permanent neighbors.

I raise this comparison because I have **personally experienced many of the same types of conduct** described in the Coastal Commission's written public comments, and in **some instances substantially worse conduct**, from permanent residents and their guests.

This reinforces my point that noise, parking problems, disruptive gatherings, nuisance behavior, and other neighborhood disturbances **are not unique to STRs** and should not automatically be attributed to the type of occupancy.

My perspective is grounded in years of sustained, real-world experience across a broad range of STR stays.

I submit these comments in response to public comments and anti-STR advocacy materials supporting Pacifica's primary-residence requirement, 60-night limit, and hosted-only restrictions.

My requests are:

- **Vote yes on Motion 1**, denying Pacifica's amendment as submitted.
- Retain the Commission staff's recommended deletions of the **primary-residence requirement and 60-night limit**.
- Add a modification deleting **Section 9-4.4903(f)**, which limits multifamily developments to hosted rentals, and **Section 9-4.4905(v)(iii)**, which prohibits unhosted rentals in multifamily developments.
- If those two multifamily restrictions are deleted, vote yes on Motion 2.
- If the multifamily restrictions remain, vote no on Motion 2 and leave Pacifica's existing certified LCP regulations in place.

Pacifica already has a Coastal Commission-certified cap of **150 STR permits**, representing approximately 1 percent of its roughly 15,000 housing units.

That cap is twice the **75 STRs** currently operating citywide and, at 1 percent of Pacifica's housing stock, is tied for the most restrictive percentage-based STR cap identified in the Coastal Commission staff report.

With the actual operating inventory equal to only approximately **0.5 percent** of Pacifica's housing stock, the evidence does not support claims that STRs are excessive in number or are taking over the city.

The proposed ordinance also includes a natural-person requirement, a one-STR ownership limit, inspections, occupancy and parking rules, noise and trash requirements, local-response obligations, and **permit revocation after two violations within one year**.

That is already an extensive system for preventing commercialization and removing bad operators.

The question is therefore not whether STRs should be regulated.

They should be.

The question is whether Pacifica should regulate and penalize **actual misconduct** by the few operators who adversely affect their neighbors, or instead impose **residency, rental-type, housing-type, and annual-night restrictions** that also punish compliant STRs operating without neighborhood impacts.

I share **substantial common ground** with residents who want illegal event venues, unsafe rooms, excessive occupancy, blocked access, trash, and repeated nuisance conduct addressed.

The dispute is whether those harms require **direct enforcement against the responsible property** or categorical restrictions that also eliminate compliant coastal accommodations.

MY EXPERIENCE: WHY THE MISCONDUCT CLAIM COUNT PERPLEXES ME

I am perplexed when I hear claims suggesting that severe STR misconduct is widespread or inevitable. In the 16 years since I began hosting, across approximately 765 stays of 30 days or less and including 30-day stays, I have had **only one serious problem guest**.

I removed that guest on the first night of a four-day reservation for violating the terms of my rental agreement.

I do not believe my record is simply luck.

I believe it is primarily the result of proactive management before I accept the reservation, before the guest arrives, at the in-person check-in, and throughout the stay.

My management practices include:

- My advertisement states the important rules and sets expectations before a guest books.
- I screen the purpose of the proposed stay, not merely whether the prospective guest can pay.
- I provide a detailed condominium guide covering occupancy, parking, trash and recycling, noise, quiet hours, building rules, and the obligation not to disturb neighbors.
I require renters to acknowledge before check-in that they have read the entire guide.
- After a reservation is made, I speak with the guests conversationally about where they are coming from, the reason for their visit, whether they are celebrating a particular occasion, and whether they need suggestions or assistance planning their stay.
- These broader, natural questions often reveal the actual purpose of the stay, the anticipated group activities, and whether the proposed use is appropriate for the property.
- I personally check in every renter or arrange for a trained person to do so.
- During that check-in, we explain where guests may park, how to handle trash, the importance of keeping noise inside, and the fact that the surrounding residents are not on vacation.
- I make clear that the condominium is lodging and not an event venue.
- I remain available to address a concern promptly instead of waiting for a neighbor or the city to solve it.

Screening proposed uses sometimes requires declining groups that might otherwise appear mature and responsible:

- I recently declined a proposed birthday gathering for a 65-year-old woman and her friends.
 - Age was not the reason I declined the reservation.
 - In fact, their age made me pause before declining because the group sounded mature and might have behaved responsibly.
 - I nevertheless declined the reservation, and the requested dates ultimately remained unbooked, causing me to lose income.
- I also recently declined a proposed five-day rental for four overnight guests who wanted to host a one-time fantasy-football draft for 15 men in their 50s.
 - Again, their ages suggested a mature group and made me consider whether the gathering might be harmless.
 - I ultimately declined based on the proposed group activity and its possible effect on the condominium and neighbors, not based on age.

These examples matter because preventing parties, excessive noise, parking problems, trash, and other neighborhood disturbances cannot be reduced to stereotypes about young guests.

Regulations should focus on preventing problem events before they occur, rather than assuming that all STRs are party or event homes and penalizing every operator based on that assumption.

The same noise, trash, parking, and neighborhood disturbances attributed to STR guests can also be caused by a homeowner or long-term tenant, potentially on a continuing basis.

Yet many opposing comments appear to assume that such problems occur frequently, or during virtually every STR stay.

The type of occupancy does not reliably predict the conduct of the occupants.

My experience demonstrates that an **unhosted rental does not have to be unmanaged**.

A responsible unhosted operator may exercise substantial control through screening, clear rules, personal orientation, monitoring, accessibility, and immediate intervention.

Conversely, the fact that an owner sleeps somewhere on the property does not guarantee that the owner screens guests, explains the rules, or responds effectively.

RESPONSES TO THE PRINCIPAL ANTI-STR COMMENTS

- **Complaint: The accounts of noise, parties, trash, fights, smoking, parking problems, trespassing, and threatening behavior prove that unhosted STRs are systemically incompatible with residential neighborhoods.**
 - The conduct described in some comments is unacceptable if it occurred as described. It **supports enforcement against the responsible guest and operator** under Pacifica's nuisance, noise, parking, garbage, and safety rules.
 - The existence of unacceptable conduct **does not establish that the conduct is systemic** throughout Pacifica's lawful STR population.
A reliable comparison would identify unique properties, separate incidents from repeated reports, distinguish legal STRs from illegal operations, report confirmed violations and enforcement outcomes, and compare the same conduct at non-STR properties.
 - [The San Francisco Standard reported](#) that **four homes generated half** of Pacifica's 66 rental complaints in 2023 and that STR-related calls represented **approximately 0.2 percent** of more than 37,000 police calls that year.
That concentration supports aggressive enforcement against repeat properties, not a categorical conclusion about every unhosted STR.
 - [Pacifica for Responsible Tourism proposed a three-strike rule](#) under which **three violations within 12 months** would result in **permit revocation for 24 months**.
That proposal demonstrates that serious enforcement can remove repeat violators while preserving compliant coastal accommodations.
 - When half of the complaints are concentrated at four properties, the record supports a **property-specific remedy** aimed at repeat violators.
It does not establish the need to restrict every compliant operator through primary-residence, hosted-only, and 60-night rules.
- **Complaint: Hosted-only rentals are a balanced solution because the host's presence prevents misconduct.**
 - Hosted lodging is a **different accommodation product**.
Replacing a whole-home rental with a room inside a stranger's occupied residence is not

regulation of the same product.

It is **elimination of one product and permission for another**.

- Families and groups often choose whole-home lodging because they need several bedrooms, a kitchen, laundry, a living room, and privacy.
- Parents traveling with children may reasonably be uncomfortable sharing a residence, bathroom, kitchen, or interior common space with an unrelated host.
- Guests traveling for a funeral, family reunion, medical need, or extended family vacation may need to speak privately and maintain ordinary family routines.
- Many homes and condominiums do not have a separate guest suite with an independent entrance, bathroom, and living area.

Requiring the owner to remain onsite may mean that no practical hosted rental can be offered.

- An owner who lives with a spouse, children, or other family members may be unable to offer a hosted rental at all.

The owner would effectively have to choose among remaining in the home with the renters, requiring the owner's family to share the home with strangers, or leaving the family elsewhere while the owner stays with the renters.

For many households, none of those options is practical or acceptable.

This is another reason a hosted-only mandate operates as a de facto ban on whole-home accommodations for families seeking to stay together in the Coastal Zone.

- Calling hosted rooms "unlimited" does not create meaningful supply if few owners can offer them and many travelers do not want them.
- Pacifica's current coastal-zone inventory itself shows the difference.

Of the 41 remaining coastal-zone STRs identified by staff, **29 were unhosted and only 12 were hosted**.

Eliminating unhosted stays would remove the majority of the existing coastal STR category, not merely alter its management.

- Host presence is also an imperfect proxy for behavior.

A primary resident can be inattentive, fail to screen a guest, ignore complaints, or permit disruptive gatherings.

A non-primary-resident owner can personally check in every guest, employ a responsive local contact, monitor permitted occupancy, and remove a guest immediately.

- The responsible policy is to require effective management practices, not a particular sleeping location for the owner.
- **A hosted-only requirement is therefore a de facto ban** for most whole-home rentals because:
 - It eliminates the privacy for which many guests chose the accommodation.
 - It requires owners to share private living space even when the home was not designed for separate occupancy.
 - It excludes owners who must live elsewhere temporarily for work, caregiving, health, or family reasons.
 - It excludes former primary residences and second homes even when the owner lives nearby and manages the property responsibly.

- It removes the majority of Pacifica’s existing coastal STR supply.
 - It substitutes residency status for actual performance and complaint history.
- [The Coastal Commission’s own August 2026 staff report](#) recommends deleting the general primary-residence requirement because of coastal-access and constitutional concerns. The same performance-based reasoning supports deleting the remaining hosted-only prohibition for multifamily properties, **although staff did not recommend that additional deletion.**
- **Complaint: The 60-night limit is a reasonable compromise, not a prohibition.**
 - **A restriction does not have to use the word “ban” to function as one.**
 - Pacifica’s existing certified program already limits the total number of STR permits. The 60-night limit imposes a second restriction that removes most of the potential use of every unhosted permit, regardless of the operator’s conduct or complaint history.
 - **Theoretical eligibility does not create practical availability.**
A primary-residence rule therefore does not create a dependable supply of whole-home rentals merely because an owner is technically permitted to rent while away.
 - An owner’s personal travel dates may not coincide with weekends, holidays, summer periods, and other dates when families seek coastal lodging.
 - Guests frequently reserve desirable dates months in advance, often before a homeowner knows when or whether the homeowner will travel.
 - If the owner’s trip is changed or canceled after the home has been rented, the owner may have to leave the owner’s own home and find alternative lodging because strangers are scheduled to occupy it.
 - Preparing a primary residence for strangers is also very different from preparing a home maintained as a whole-home STR.
The homeowner may need to secure medications, valuables, financial records, private correspondence, photographs, computers, personal papers, fragile items and other sensitive belongings; empty closets and drawers; protect mail and deliveries; remove personal items; arrange cleaning and guest access; and restore the home after returning.
 - Many homeowners would not permit strangers to sleep in their bed, use their bathroom and kitchen, open their closets, and live among their personal possessions, regardless of the amount offered.
 - A homeowner willing to rent occasionally may still be unable to provide predictable availability.
A paper allowance tied to the owner’s personal travel schedule is not an equivalent replacement for a consistently managed whole-home coastal accommodation.
 - A lawful STR also has annual fixed costs that do not decline proportionately when most operating nights are removed.
These may include permit and inspection fees, specialized insurance, safety equipment, maintenance, cleaning arrangements, management or local-contact services, and the continuing expense of keeping the property ready for guests.
Some owners may continue operating under the limit.
Others will reasonably conclude that the costs, preparation, disruption, responsibilities, privacy concerns, and risks cannot be justified for such limited and unpredictable use.

- The result is paper permission that many owners cannot use in a practical or economically sustainable manner.
The restriction also does not transform the property's remaining unavailable periods into long-term housing.
- A 60-night limit does not distinguish between a property with repeated verified violations and an operator with a perfect record.
It restricts both equally.
- If housing conversion is the objective, the city must demonstrate that discontinued STRs will actually enter the long-term housing market.
The record does not do so.
- [The Coastal Commission's own August 2026 staff report](#) says that the primary-residence requirement and 60-night limit would **severely curtail unhosted STRs and cause a significant loss of overnight accommodations.**
- The Coastal Commission's own staff report expressly recognizes that the 60-night limit creates a **largely binary choice**: the owner must remove the property from STR use or effectively leave it unavailable for most of the year because it cannot also be offered as conventional long-term housing around scattered STR reservations.
- The Coastal Commission's own staff report further states that Pacifica has **no mechanism requiring an owner who discontinues STR use to rent or sell the property for long-term residential use** and **finds little evidence that these restrictions would create additional housing, particularly affordable housing.**
- [The Coastal Commission's own August 2026 staff report](#) states that Pacifica's citywide STR inventory fell from approximately **145 to 75** after the new restrictions began operating outside the Coastal Zone.
Staff reports a decline of **nearly 40 percent** inside the Coastal Zone and **nearly 60 percent** outside it, with the outside decline concentrated among unhosted rentals.
Staff expects implementation in the Coastal Zone to cause further market contraction and another significant loss of overnight accommodations.
- **Complaint: STR restrictions will return homes to families and create affordable long-term housing.**
 - It is possible that an individual former STR will be sold to a family or offered as a long-term rental.
Individual examples do not establish the overall result of a categorical restriction.
 - Pacifica already has a 150-permit ceiling, approximately 1 percent of an estimated 15,000 housing units.
 - Only 41 STRs remained in the Coastal Zone when the August staff report was prepared.
Eliminating or further restricting 41 coastal properties cannot reasonably be assumed to solve Pacifica's larger housing-affordability problem.
 - There is no provision requiring a discontinued STR owner to:
 - Offer the property as a long-term rental.
 - Charge an affordable rent.
 - Sell the property.
 - Sell to a local resident.

- Sell below market value.
 - Accept a tenant with children.
- [Staff notes](#) a Pacifica median home price of approximately \$1.3 million and a median two-bedroom rent of approximately \$3,650 per month.
A market-rate house does not become affordable housing merely because STR use is prohibited.
- Some properties will be retained as second homes, occupied by their owners for part of the year, sold at market price, left vacant, or used for monthly stays.
- [The Coastal Commission's own August 2026 staff report](#) expressly finds little evidence that Pacifica's proposed restrictions will produce long-term or affordable housing.
That staff finding is more directly relevant to this amendment than broad studies or advocacy assumptions imported from other cities.
- Without that information, the statement that restricting an STR "returns housing" is an assumption, not a demonstrated Pacifica result.
- **Complaint: Multifamily residences are "affordable by design," so unhosted STRs should be prohibited there.**
 - [The Coastal Commission's own August 2026 staff report](#) rejects the broader assumption that additional STR restrictions will materially create long-term or affordable housing, but it accepts Pacifica's "affordable by design" rationale for multifamily units.
That creates an **internal tension** in the recommendation because **no covenant, price control, or ordinance mechanism** requires a discontinued condominium STR to become long-term, affordable, or workforce housing.
 - A condominium may be smaller than a detached house and still be market-rate housing.
At the same time, smaller multifamily units may provide some of the most attainable whole-home coastal lodging for ordinary families.
 - My Hermosa Beach property illustrates the concern.
It is an approximately **815-square-foot, two-bedroom condominium** that rents for **under \$350** per night in slower periods and **under \$675** at peak periods.
A large luxury detached home two doors away rents for approximately **\$10,000 per night**.
 - Pacifica's LCPA, as originally submitted, could unintentionally limit not only the number of whole-home STRs, but also the **range of sizes, prices, locations, and features**.
If only a handful remain, the available inventory may become concentrated among expensive detached houses while smaller and more moderately priced options disappear.
 - A family that needs two bedrooms and a kitchen should not be limited to a hosted room, a detached luxury house that may be larger or more expensive than it needs, or multiple separately accessed hotel rooms.
One whole-home STR can keep the family together behind one main entrance and may provide the needed configuration at a substantially lower total cost.
 - A family that needs two bedrooms and a kitchen should not be told that its alternatives are a hosted room, a detached luxury house that may be too large for its needs, or multiple separately accessed hotel rooms.

Among the Pacifica hotels I personally called, only two offered any kitchenette accommodations.

- The kitchenette quotes were approximately \$259, \$279, and \$450 per night, depending on the room or property.
 - I found no single hotel accommodation providing both two bedrooms and a kitchen.
 - Each quoted amount covered the kitchenette accommodation itself and did not include the cost of the second room a family needing two bedrooms would have to rent.
 - A family needing both multiple bedrooms and cooking facilities may therefore have to rent multiple hotel rooms without receiving the combination of bedrooms, kitchen, privacy, and common living space available in a single whole-home STR.
- My own experience demonstrates why actual history matters. Multifamily properties can present legitimate shared-wall, parking, trash, and building-rule concerns. Those concerns support occupancy limits, noise rules, inspections, direct enforcement, and permit revocation. They do not establish that every unhosted condominium should be prohibited regardless of its compliance history.
- I have operated my STR with the knowledge and support of the other owners in my six-unit condominium building.
 - One owner has frequently arranged for visiting friends and family to stay in my STR so they could be close to him.
- I request **deletion of Sections 9-4.4903(f) and 9-4.4905(v)(iii)**, leaving Pacifica’s conduct, safety, inspection, and revocation rules in place for multifamily STRs.

● **Complaint: Pacifica has approximately 330 hotel and motel rooms, hosted rentals, and nearby regional lodging, so unhosted STRs are unnecessary.**

- [The Coastal Commission’s own August 2026 staff report](#) finds that STRs are a **significant component** of Pacifica’s overnight accommodation inventory and may be the **predominant form** when their multiple bedrooms are considered. Eliminating unhosted STRs therefore removes a substantial lodging category rather than a marginal duplication of hotel supply.
- Hotel rooms, hosted rooms, and whole-home STRs serve different needs. Telling a family that a single hotel room replaces a whole-home STR is like telling someone who needs a passenger car that a truck is available: both provide transportation, but they are not interchangeable.
- Regional lodging outside Pacifica does not provide the same access to Pacifica’s beaches, trails, neighborhoods, and local businesses. The Coastal Commission’s own staff report concludes that reducing Pacifica’s overnight accommodations would **particularly burden inland and lower-income Californians** and would reduce meaningful public recreational access.

- Requiring visitors to stay outside Pacifica and drive back each day would increase travel costs, vehicle trips, congestion, and the practical burden of coastal access.
It would also work against the Coastal Act's access policies and its [objective of minimizing vehicle miles traveled](#).
- Day trips remain important, but they are not an equivalent substitute for overnight access. A family should not have to leave the coastal community every evening simply because a different lodging product may exist elsewhere.
- **Complaint: Primary-residence and hosted-only rules are necessary to prevent corporations and absentee investors from taking over neighborhoods.**
 - Pacifica's other provisions already address this concern much more directly.
 - The ordinance limits permits to natural persons.
 - It restricts a person to one ownership interest in an STR.
 - The existing certified program caps the entire market at 150 permits.
 - Because STR permits are limited to natural persons, **a corporate entity cannot obtain a permit.**
The one-ownership-interest rule also **prevents one eligible person from accumulating a permitted Pacifica STR portfolio.**
Concealed or related ownership used to evade that rule can be addressed through beneficial-ownership disclosure and permit enforcement.
 - Primary-residence status does not prove that an owner is attentive, local in practice, financially dependent on the home, or respectful of neighbors.
 - Non-primary-residence status does not prove that an owner is a corporation or a speculator.
 - [The San Francisco Standard reported](#) one Pacifica owner who moved to the East Bay to care for ill relatives but retained and responsibly rented his Pacifica home.
It also reported that officials and law enforcement supplied no evidence contradicting his statement that he had received no party or noise complaints during his first 11 months.
 - Ownership concentration and operator performance can be regulated directly.
Primary-address status is not reliable evidence of either.
- **Complaint: Pacifica conducted a lengthy local process, so the Coastal Commission should defer to the City's conclusion.**
 - The length of a process does not establish that every resulting restriction is consistent with the certified LUP and its incorporated Coastal Act access provisions.
Public participation informs the record, but repetition and majority preference do not resolve that consistency question.
 - [The Coastal Commission's own August 2026 staff report](#) completed the Pacifica-specific review and concluded that the primary-residence requirement and 60-night limit **cannot be certified as submitted.**
That conclusion rests on the loss of overnight accommodations, the resulting burden on public access, and the lack of evidence that the restrictions would create long-term or affordable housing.

RESPONSE TO ANTI-STR ADVOCACY RESEARCH AND RECURRING CLAIMS

- **Claim: Better Neighbors LA and “A Balancing Act” provide neutral research proving that hosted-only eligibility and Pacifica’s 60-night limit are the proper Coastal Zone policy.**
 - **Better Neighbors LA is not an independent grassroots movement** in any ordinary sense. Better Neighbors LA is a law-firm-based, lawyer-led advocacy coalition that includes hotel workers, [has partnered](#) with [UNITE HERE Local 11](#), and expressly seeks to protect hotel jobs, as stated on their own website.
 - **Better Neighbors LA’s Pacifica letter** lists the same Los Angeles address and suite as Hadsell Stormer Renick & Dai, LLP.
[The law firm identifies Randy Renick as a partner](#), and [Better Neighbors LA’s Pacifica letter is signed by Randy Renick](#).
 - By endorsing hosted-only eligibility and Pacifica’s 60-night limit as a “**gold standard**,” it backs a framework that would sharply suppress a competing lodging category and predictably benefit incumbent hotels and their unionized workforce.
 - UNITE HERE Local 11 represents hospitality workers and [separately advocates primary-residence-only STR policies](#).
Those disclosed interests place Better Neighbors LA on an **economically interested side of the lodging market**.
 - Better Neighbors LA’s Pacifica correspondence called the ordinance a [new “gold standard” for other coastal communities](#).
Yet [the Coastal Commission’s own August 2026 staff report](#) found that the primary-residence and 60-night restrictions would sharply reduce a significant category of Pacifica’s overnight accommodations.
 - The Coastal Commission’s own August 2026 staff report illustrates the practical effect: if all 150 permits were unhosted STRs, potential rental nights would fall from approximately **55,000 to 9,000**, a reduction of **more than 85 percent**.
Staff describes the resulting loss of overnight accommodations as significant.
 - Better Neighbors LA’s hosted-only “gold standard” therefore preserves STRs in name while eliminating most whole-home rentals in practice.
The “gold standard” label **should concern the Coastal Commission, not persuade it**.
When an organization begins with the position that only hosted rentals are legitimate, a policy eliminating most unhosted whole-home lodging will naturally appear successful under its chosen standard.
 - By endorsing hosted-only eligibility and Pacifica’s 60-night limit as a model, Better Neighbors LA backs a framework that **sharply suppresses a competing lodging category and predictably benefits incumbent hotels and their unionized workforce**.
That economic alignment follows from the policy’s practical effect and Better Neighbors LA’s disclosed hotel-job mission.
It does not depend on alleging a funding arrangement that the present record does not document.

- [“A Balancing Act”](#) was prepared by Nicholas V. DiRago for Better Neighbors LA and [advances the hosted-only and strict-cap policy](#) Better Neighbors LA already promotes.
It may be considered as an advocate’s policy research, but may be **commissioned advocacy** from an economically interested side of the lodging market, **not independent proof of Pacifica-specific causation**.
- This is precisely my concern for Hermosa Beach.
The Coastal Commission regularly explains that each Coastal Act action turns on the individual community and record.
Calling Pacifica’s ordinance a “gold standard” invites other cities to **copy the result first and search for local justification afterward**.
- **Claim: AirDNA, Inside Airbnb, statewide studies, and large-city studies establish how many Pacifica homes have been removed from housing and what Pacifica’s restrictions will accomplish.**
 - Platform data can identify market activity, but **a scraped listing is not necessarily a unique, occupied housing unit**.
One property may appear as a room and an entire home, on several platforms, or as inactive or temporarily unavailable inventory.
 - Different platforms do not use a common public property identifier.
They also attract different audiences, so an operator may use different photographs, wording, rates, and marketing emphasis for the same property on each platform.
 - Those differences can make manual or AI matching difficult and can cause the **same STR to be counted more than once** unless the data are reliably deduplicated.
 - In my own experience, Airbnb produces approximately **70 percent of my off-season rentals**, while VRBO produces approximately **90 percent of my higher-priced summer rentals**.
Advertising the same property differently on both platforms reaches distinct markets; it does not represent two STRs.
 - [The San Francisco Standard reported](#) that Pacifica’s official count was **173** while *Pacifica Homes Are Not Hotels* cited an Inside Airbnb count **exceeding 230**.
Pacifica’s assistant city manager explained that duplicate advertisements could account for the discrepancy and that the City’s contractor searches **more than 10,000 booking websites and platforms** to identify duplicates.
 - The current inventory of **approximately 75 permitted STRs** also shows why older scraped totals do not describe the market now before the Coastal Commission.
 - Statewide or large-city studies may identify possible relationships between STR activity and housing conditions, but they **do not establish the same effect in Pacifica**.
 - Even if STRs were shown to affect homelessness in Los Angeles or San Francisco, that would not prove the same result in Pacifica.
Pacifica has different scale, vacancy, tourism, housing supply, legal rules, and an existing 150-permit cap.
 - Calendar availability does not establish actual bookings.
A listing described as “full-time” because it appears available for much of a month is not

necessarily booked full time, and the listing does not establish what the owner would do if STR use ended.

- Correlation between listing growth and housing costs does not by itself establish how much of the change was caused by STRs rather than jobs, incomes, interest rates, zoning, construction constraints, population change, or broader demand.
- The relevant Pacifica question is **what a particular discontinued STR will actually become**.
- [The Coastal Commission's own August 2026 staff report](#) found **little evidence** that the restrictions would produce long-term housing, especially affordable housing, and identified no mechanism requiring an owner to rent or sell the property for long-term residential use.

- **Claim: Comparing a whole-home STR's average rate with one hotel room proves that whole-home STRs do not advance coastal access.**

- [The Coastal Commission's own August 2026 staff report](#) declines to classify STRs **categorically** as lower-cost or higher-cost because prices, sizes, locations, and amenities vary.
- The proper conclusion is not that every STR is affordable.
It is that whole-home STRs provide a **distinct range of accommodations** that hotels and hosted rooms do not fully replace.
- A one-room hotel comparison does not adequately account for bedrooms, occupancy, kitchens, refrigeration, laundry, common space, privacy, parking, or the number of hotel rooms a family would require.
A whole-home STR can give parents and teenage children separate bedrooms while **keeping the family together behind one main entrance**, making it easier for parents to know when family members enter or leave.
- A kitchen can make a longer coastal stay attainable for families with children or dietary needs.
- A whole-home STR also avoids multiplying the cost of separately priced hotel rooms and the parking, facility, rollaway-bed, and laundry charges that may accompany them.
- AirDNA averages may combine different property sizes, neighborhoods, dates, seasons, and availability patterns.
 - An average whole-home rate therefore does not establish what a particular family would pay for an equivalent hotel arrangement.
 - Coastal access also cannot be measured solely by the lowest advertised rate; disability needs and family composition affect whether a lodging option is usable.
- A one-room hotel comparison also does not establish that eliminating STRs will lower hotel prices.
 - [Business Insider reported](#) that after New York City began enforcing Local Law 18, listings for stays under 30 days fell approximately 82 percent while the average hotel-room price reached a record \$301 per night, 8.5 percent above 2022.
 - [A 2025 peer-reviewed study of New York City's STR ban](#) estimated that the ban increased average daily hotel rates by approximately \$14 to \$19 per night.
 - New York is not Pacifica, so this is not a Pacifica forecast.
It directly disproves the assumption that reducing STR competition necessarily makes

hotel lodging cheaper and demonstrates that the primary beneficiary may instead be incumbent hotels.

- Limiting whole-home STRs to a small number may unintentionally narrow the remaining range of sizes and prices.
- The result could be a **market concentrated in expensive detached or luxury homes**, leaving families without the whole-home configuration they need even when they can afford a reasonably priced option.

- **Claim: Pacifica Homes Are Not Hotels has documented a systemic problem requiring elimination of unhosted rentals.**

- [Pacifica Homes Are Not Hotels](#) has assembled concerns and individual experiences that can identify enforcement priorities.
- Its submissions **do not provide a complete incident audit** separating allegations from confirmed violations, repeated reports from separate incidents, unique properties from repeat problem properties, or legal STRs from illegal operations.
- [The September 2024 San Francisco Standard article](#) illustrates the verification problem.
 - One advocate said he had called police **approximately 35 times** about one property but did not provide the reporter with photographs, video, dates, times, or case numbers; **police declined to confirm the count**, and the property manager reported no record that he contacted it.
 - Another opponent supplied a trash-bin photograph and a photograph of eight cars; the reporter said the cars did not appear to block the road, and the resident said **she had never filed a City complaint**.

The [September 2024 report](#) did not independently establish that the photographed trash or parked vehicles were caused by STR guests.

That omission does not disprove the resident's concern, but it reinforces why attribution should be verified before an incident is used to justify a categorical restriction.
 - The same article reported that **four homes generated half** of the 66 rental complaints in 2023 and that STR-related calls were **approximately 0.2 percent** of more than 37,000 police calls.
- Repeated allegations against a few properties may justify revocation at those properties; they do not establish that every lawful unhosted STR is a nuisance.
- **Calling a home a “hotel” does not make it one** or resolve the Coastal Act analysis, just as calling a family kitchen a restaurant does not make it one.
- [Pacifica's existing certified LCP already allows and regulates STRs](#) through a citywide cap, licensing, compliance, and good-neighbor standards.

That certified framework is the relevant baseline for the Coastal Act analysis.
- The relevant facts are the property's actual operation, scale, compliance history, neighborhood effects, and contribution to overnight coastal access.
- Emergency access, illegal parking, trash, smoke, litter, trespassing, unsafe rooms, and disruptive events are legitimate concerns at STRs, owner-occupied homes, and long-term

rentals.

Each can be regulated and enforced directly against the responsible guest, resident, owner, or operator.

- **The 61st rental night is not inherently more dangerous than the 60th**, and hosted status does not make an unpermitted bedroom safe.

- **Complaint: STRs threaten emergency access and public safety.**

- Emergency access is a legitimate concern.
Pacifica should enforce legal parking and occupancy limits at every property.
- A verified instance of blocked emergency access should result in immediate enforcement, regardless of whether the obstruction was caused by an owner, long-term tenant, visitor, contractor, or STR guest.
- Blocked emergency access is not unique to STRs.
An owner or long-term tenant can host a pool party, family gathering, or other event whose guests block emergency vehicles just as STR guests can.
Permanent residents may have extensive local networks of visitors arriving in separate cars, while STR guests may arrive together.
The record does not establish that STR occupants are more likely than permanent residents or their guests to block emergency access.
- Pacifica should therefore enforce parking and emergency-access laws against the conduct itself, regardless of whether the property is owner-occupied, rented long term, or operated as an STR.
- In June 2026, [a Birmingham residential pool party](#) blocked streets and triggered repeated police calls, even though the homeowner stated that it was not booked through an STR platform and the City classified it as a private residential pool rental.
This is why blocked access must be attributed accurately before it is used to justify STR restrictions.
- The remedy is not a 60-night cap. The 61st rental night is not inherently more dangerous than the 60th, and hosted status does not make an unpermitted bedroom safe.

- **Claim: Hosted rentals avoid neighborhood problems because an owner will control guests when the owner's own home is involved.**

- This claim is a **hasty generalization** based on an assumption that sounds reasonable but is **not supported by identified comparative evidence**.
- The submitted advocacy does not establish that host presence predicts better screening, clearer rules, faster response, or fewer verified violations.
- An unhosted property may also be a deeply personal home, and the operator has **direct financial incentives** to prevent property damage, neighbor complaints, and loss of the permit.
- A responsible unhosted operator can screen the booking purpose, provide enforceable rules, conduct a personal or trained in-person check-in, maintain a responsive local contact, intervene promptly, and terminate a violating stay.
- **Host presence is an imperfect proxy.**
A primary resident can be inattentive, while a non-primary-resident owner can be local, personally involved, and highly responsive.

- **Actual operating practices and verified complaint history** are more informative than where the owner sleeps.
- **Claim: STRs reduce school enrollment and neighborhood stability.**
 - [The Coastal Commission’s own August 2026 staff report](#) finds **little evidence** that Pacifica’s additional STR restrictions would create long-term housing, especially affordable housing, and notes that the City has **no mechanism requiring owners to rent or sell discontinued STR properties for long-term residential use.**
 - The report explains that the 60-night restriction can create a [binary choice](#), “**effectively leaving the house empty for most of the year or removing it as an STR.**”
 - A property left empty adds **neither a family to the neighborhood nor children to local schools.**
It does, however, eliminate coastal lodging and the overnight visitors who support Pacifica’s restaurants, shops, and other local businesses.
The likely result is harm to the local tourism economy without any demonstrated gain in housing or school enrollment.
- **Claim: STR guests do not meaningfully support local businesses because whole-home rentals have kitchens.**
 - This is **another hasty generalization** based on an assumption rather than spending data. Having a kitchen does not mean visitors bring everything from home, prepare every meal, or avoid local businesses.
 - For guests who fly to the area, bringing a vacation’s worth of groceries from home is not a realistic option.
Those visitors must purchase food and other necessities after they arrive, creating local spending regardless of whether they prepare some meals in the STR.
 - Even when guests prepare some meals, they may still visit restaurants and coffee shops, shop locally, pay for recreation, and use other local services.
A kitchen can also make a longer stay affordable and practical, potentially producing more days of local spending.
 - It is simply not credible to assume that a vacationing family, even one that prepares some meals in its rental, **will spend nothing in the local economy** during its stay.
 - [Pacifica City staff](#) identified restaurants, cafes, and retail establishments as businesses that rely heavily on the hospitality sector, and [the San Francisco Standard](#) quoted a Pacifica business owner who said his business **relied heavily on STR traffic.**
 - [Pacifica’s fiscal analysis, reproduced at PDF page 22 of the February 2026 Coastal Commission correspondence](#), stated that its estimate excluded broader local-economic effects, including sales-tax impacts on visitor-serving restaurants, cafés, and retail establishments that rely heavily on the hospitality sector.
 - [The same correspondence reports at PDF page 52](#) that staff said a comprehensive third-party study would be needed to assess changes in visitor spending, effects on local businesses, and whether displaced visitors would use Pacifica hotels or lodging outside the city, and that the City Council did not request that study.

- At the [February 24, 2025 City Council hearing, beginning at 3:16:00](#), Margaret Coles-Wesley, speaking as the manager of her family’s Palmetto Avenue pie business and for the Seaside Merchants Association, said that STR visitors represented approximately \$1 million in business revenue in the district and that weekend visitors helped fill the gap between local spending and what was needed to sustain a full business district. This is Pacifica-specific firsthand evidence from a local merchant representative, not an assumption about how visitors might spend.
- Removing the lodging used by those visitors predictably removes at least some of their local spending.

WHY THE REMAINING REGULATORY SYSTEM IS ALREADY STRONG

- Deleting the primary-residence requirement, 60-night limit, and multifamily hosted-only provisions **would not create an unregulated market**.
[The Coastal Commission’s own August 2026 staff report](#) explains that Pacifica would retain a **strong framework** addressing market scale, ownership concentration, operating conduct, safety, and repeat violations.
- A maximum of **150 STR permits**, equal to approximately 1 percent of Pacifica’s housing stock.
- Eligibility limited to natural persons, with **one STR ownership interest** per person.
- Registration, inspection, occupancy, parking, advertising, safety, noise, quiet-hour, trash, and event restrictions.
- A local-contact and response obligation.
- Escalating enforcement and **mandatory permit revocation after two violations within one year**.
- The three disputed categorical restrictions operate differently because they **reduce compliant coastal lodging without requiring any misconduct**:
- The primary-residence rule excludes an owner based on residency status rather than performance or complaint history.
- The 60-night limit would reduce the maximum potential nights for 150 unhosted permits from approximately **55,000 to 9,000, more than 85 percent**, without targeting a nuisance property.
- The multifamily hosted-only rule removes smaller whole-home accommodations based on building type even when the property has no verified complaint history and no affordability covenant.

DIRECT, CONDUCT-BASED ALTERNATIVE

The existing cap, natural-person and one-interest limits, inspections, operating rules, local-response requirements, escalating penalties, and mandatory revocation provisions **directly address the concerns** in the correspondence.

They limit scale, prevent permitted portfolio accumulation, require safe and neighbor-conscious operation, and provide a mechanism to **remove repeat violators**.

A record organized by **unique property and incident**, with verified violations and enforcement outcomes separated from repeated allegations, would make future adjustments more reliable.

That approach preserves lawful coastal accommodations while maintaining **strong remedies for actual misconduct**.

CONCLUSION

My experience is substantial and unusually broad: **approximately 765 stays of 30 days or less** in my own Coastal Zone property since 2010, an **estimated 4,200 renter groups at the nine STRs in and immediately around my building**, and an **estimated 7,400 renter groups at the 16 STRs known to me on my block over six years**.

Across that experience, I had one serious problem guest in my own rental and removed him on the first day of his four-day reservation for violating the rental agreement; I also dealt with only one problem group among the neighboring stays.

This is not a handful of anecdotal encounters, but sustained firsthand exposure to thousands of stays over many years.

That history supports the conclusion that proactive management and prompt enforcement matter more than hosted status alone.

[The Coastal Commission's own August 2026 staff report](#) reaches the central Pacifica-specific conclusions: the primary-residence requirement and 60-night limit would cause a **significant loss of overnight accommodations, reduce public recreational access**, and are not supported by evidence that the eliminated STRs would become long-term or affordable housing.

The same absence of a housing-conversion mechanism and the same performance-based reasoning support deletion of the multifamily hosted-only restrictions.

My final requests are:

- Vote yes on Motion 1.
- Retain staff's deletions of the primary-residence requirement and 60-night limit.
- Add a modification deleting Sections 9-4.4903(f) and 9-4.4905(v)(iii).
- Vote yes on Motion 2 only with those additional multifamily deletions.
- If the multifamily hosted-only restrictions remain, vote no on Motion 2 and leave Pacifica's existing certified LCP regulations in place.

Respectfully submitted,

Jim Holtz

Coastal-zone short-term rental owner, operator and neighbor
Hermosa Beach, California

GROUP SOURCE LINKS USED IN THE COMMENTS

The URLs below are displayed in full so they remain usable if embedded hyperlinks are removed or disabled.

Repeated citations are grouped by source rather than repeated in document order.

SOURCES AND LINKS

1. **California Coastal Commission, August 2026 staff report, relevant PDF pages 6 and 13-19**
<https://documents.coastal.ca.gov/reports/2026/8/W13b/W13b-8-2026-report.pdf#page=6>
2. **California Coastal Commission, August 2026 exhibits, relevant PDF pages 5 and 10-12**
<https://documents.coastal.ca.gov/reports/2026/8/W13b/W13b-8-2026-exhibits.pdf#page=5>
3. **California Coastal Commission, August 2026 correspondence, relevant PDF pages 265-270**
<https://documents.coastal.ca.gov/reports/2026/8/W13b/W13b-8-2026-corresp.pdf#page=265>
4. **California Coastal Commission, February 2026 correspondence and Pacifica staff materials, relevant PDF pages 22 and 52**
<https://documents.coastal.ca.gov/reports/2026/2/W15a/w15a-2-2026-corresp.pdf#page=22>
5. **Better Neighbors LA and UNITE HERE Local 11 joint submission, relevant PDF pages 8-10**
<https://documents.coastal.ca.gov/reports/2023/3/W14b/W14b-3-2023-exparte.pdf#page=8>
6. **California Coastal Act, Public Resources Code section 30252**
https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC§ionNum=30252
7. **San Francisco Standard, “Pacifica is cracking down on Airbnbs. Some residents say it’s not enough”**
<https://sfstandard.com/2024/09/06/pacifica-airbnbs-regulations/>
8. **Pacifica for Responsible Tourism, enforcement proposals**
<https://www.pacificatourism.org/proposals.html>
9. **Pacifica Homes Are Not Hotels**
<https://www.pacificahomesarenohotels.org/>
10. **Better Neighbors LA, About Us**
<https://betterneighborsla.org/about-us>
11. **Nicholas V. DiRago for Better Neighbors LA, “A Balancing Act,” title and authorship at PDF page 1; recommendations at PDF page 5**
https://static1.squarespace.com/static/5fc9845732f65217775cb3a5/t/6995fd4c129fbf0727982d0a/1771437388130/A%2BBalancing%2BAct_Low-Cost%2BLodging%2Band%2BAffordable%2BHousing%2BAlong%2Bthe%2BCalifornia%2BCoast_pdf.pdf#page=1
12. **Hadsell Stormer Renick & Dai LLP, Randy Renick profile and office address**
<https://www.hadsellstormer.com/our-attorneys/randy-renick/>
13. **UNITE HERE Local 11, short-term-rental policy**
<https://www.unitehere11.org/community/short-term-rentals/>
14. **Pacifica City Council meeting video, cited segment beginning at 3:16:00**
<https://www.youtube.com/watch?v=AZO-0RomNH8&t=11760s>
15. **WXYZ Detroit, Birmingham residential pool-party report**
<https://www.wxyz.com/news/region/oakland-county/neighbors-outraged-after-massive-pool-party-takes-over-birmingham-street>

16. **Business Insider, New York City STR inventory and hotel-price report**
<https://www.businessinsider.com/airbnb-numbers-shrink-hotel-prices-soar-ban-nyc-2024-6>
17. **European Journal of Political Economy, 2025 study of New York City's STR ban**
<https://ideas.repec.org/a/eee/poleco/v89y2025ics0176268025000850.html>
18. **City of Pacifica, Short-Term Rental Program**
<https://www.cityofpacifica.org/departments/administrative-services/finance/short-term-rental-program>
19. **Hermosa Beach court decision report**
<https://www.hermosareview.com/court-rules-hermosa-beach-short-term-rental-ban-unenforceable/>

From: Spencer
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Thursday, August 6, 2026 1:33:23 PM

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Hello, I'm a Pacifica resident who already struggles with the high cost of living and expensive housing. I'm writing to ask the council to pass the LCPA unamended, as the voters have already chosen. Please make this choice for the benefit of the people, and not for the benefit of large corporations. Thank you
-Spencer Horne

From: [Mary Janowitz](#)
To: NorthCentralCoast@Coastal
Cc: [Mary Janowitz](#)
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Wednesday, August 5, 2026 8:53:32 PM

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To whom it may concern:

I am a resident of Pacifica in the west sharp park neighborhood.

I strongly object to changing the primary Residency requirement which Pacificans have approved thru our City Councils and Planning commission. If we do not maintain that only Pacificans who live in Pacifica 6 months of the year can have short term rentals our homes may be bought by investors. I also object to the elimination of the 60 day per year maximum rental nights. Sharp Park has been impacted by the air B&Bs in a way that has decreased cohesiveness among the neighbors who are still here and not displaced by investors who have bought homes and turned them into short term rentals.

Please do not change the requirements that Pacificans have worked hard to make fair to all our residents. Changing these requirements will be extremely detrimental to the nature of Pacifica.

Thank you for your consideration of this matter.

Mary Janowitz 154 Shoreview Avenue
Pacifica. CA 94044

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: [Ringuette, Oceane@Coastal](mailto:Ringuette,Oceane@Coastal)
Subject: FW: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Friday, August 7, 2026 9:48:09 AM

-----Original Message-----

From: Patricia Kephart <pattykepster@gmail.com>
Sent: Thursday, August 6, 2026 8:15 PM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).

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Dear Commissioners,

I appreciate the work you do to preserve the quality of our coast. Pacifica has undergone dramatic changes since I moved here in 1986. One of the saddest and most extreme changes has been through the onslaught of STRs sweeping up our most treasured neighborhoods. The last eight years community members and the city developed a balanced ordinance to regulate what became a serious takeover. The last time the city's proposed ordinance came before you, the Commission staff consulted with city staff to make a strong ordinance similar to the one Half Moon Bay created. Hence the 60 day maximum and requirement of hosted STRs were the outcome of the Commission staff's recommendations.

How astounding to read the revised recommendation which cancels out the teeth of Pacifica's ordinance. I live across the street from 1159 Barcelona Dr. It just sold. When it was an unhosted STR it was a nightmare for the neighborhood. Huge numbers of cars lined the street blocking emergency vehicles. Outside lights which shone into my bedroom at night were left on for days. Garbage piled up. The turn over in occupants was unnerving. The ordinance saved us. I don't think there should be a difference in whether or not a Pacifica home is literally on the coast or on the east side of Highway 1. If 1159 can return to housing stock, the STRs closer to the water can too.

Unhosted STRs are moneymakers. The nightly rental for many of those advertised are only for the rich. The argument that those STRs are affordable to less affluent inland Californians doesn't hold up. Only the hosted STRs are truly affordable.

If the two key elements of Pacifica's STR ordinance—the primary residence requirement and the 60-night cap on unhosted rentals—are taken away, Pacifica will then be only one of two other cities in all of San Mateo County without them and this will leave our City with zero protection against corporations and out-of-town investors taking away much-needed housing and commercializing our neighborhoods.

Please look again. Don't make Pacifica the target of greedy corporate homeowners. Respect the community process that so many of our residents attended these eight years. Support our home.

From: [Emil Lehan](#)
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Wednesday, August 5, 2026 9:57:37 AM

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Hello,

As a 16 years resident and homeowner at 804 burns court I object to dropping the two most important short term rental requirements.

Elimination of these two requirements is unacceptable.

1) must be a resident for at least 6 months of Pacifica

2) no more than 60 rental days per year

These two requirements keep our community. With out them we are just destination town with our true residents

Emil Lehan

Date: August 7, 2026

From : William “Leo” Leon and Kris Geiger, 111 Olympian Way, Pacifica CA 94044

RE: Public Comment for August 12, 2026 Hearing, City of Pacifica LCP Amendment Number 2-PAC-25-0079-2 (Short Term Rentals)

To: Coastal Commissioners, North Central Coast Manager, North Central Coast Supervisor

Dear Commissioners, we have read the Staff Report, W13b, prepared by Staff for your consideration. We respectfully disagree with Staff regarding key issues raised in the Summary of Staff Recommendation prepared on July 30, 2026.

We do not agree with Staff recommendation of no annual Cap on stays for un hosted Short Term Rentals (STRs). We ask that you consider our comments and ultimately postpone your decision or not approve Staff’s Recommendation. We ask that you direct Staff to due further research and move to continue the meeting to a date to be determined within the timeframe of the action deadline of April 7,2027.

In support of our request we submit for your consideration certain factors that need to be further explored and that in our opinion avoid an extreme recommendation that appears over reaching instead of balanced.

Staff has opined and given example of potential reductions under the Primary Residency by stating that if all 150 STR’s under the CAP were un hosted the rental nights would be reduced by 85% compare existing STR provisions. This calculation skews the potential impact to that of an extreme scenario that to our understanding has never been proposed by Pacifica. It should not be used or considered as fact.

The Staff report addresses the broader issue of housing availability and states that the relationship between STRs and housing can be quite complex. Stating further that there does not appear to be an either/or distinction between allowing an STR versus using that home for longer term housing. From a community perspective we strongly disagree.

We and our neighbors are being directly impacted by the proliferation of STRs on our street and in our neighborhood. Although there is a total Cap of STR’s there is no limit for individual streets or Districts.

As for housing availability, we’ll add that we know of former STRs that were converted to long term rentals on Grand Avenue a block away from us when the new Ordinance was locally approved. The neighbors welcomed that change and they now have new neighbors to enjoy. And the neighborhood is better off with a permanent resident.

Date: August 7, 2026

From : William “Leo” Leon and Kris Geiger, 111 Olympian Way, Pacifica CA 94044

RE: Public Comment for August 12, 2026 Hearing, City of Pacifica LCP Amendment Number 2-PAC-25-0079-2 (Short Term Rentals)

Furthermore, Staff states there is no mechanism or mandate to assure that property owners will sell their properties for longer term residential use if they can’t pursue STRs and there currently no evidence to suggest that the housing stock in question would be affordable if it were converted to permanent housing.

Moreover, Staff that there is no substantive basis for concluding that the proposed STR regulations will meaningfully improve the availability of housing stock in the coastal zone in Pacifica, particularly for particularly for low and moderate cost housing. Staff concludes by saying: However, reducing STRs would necessarily reduce access opportunities for those who can afford to rent them for a short time, but who cannot afford to buy or rent such properties longer term. In our opinion Staff has made without evidence a conclusion about the intent and financial status of STR renters.

We submit the following data which shows Pacifica is among the most affordable places to live on the coast in San Mateo County, it shows that the Average Rent to income ratio for people in Pacifica is 30.3% just over the Federal 30% threshold versus 33-38% for Half Moon Bay and 35% for unincorporated San Mateo County. Pacifica has the best affordability on the Coast.

Key Economic Metrics for Pacifica Renters

- **Median Renter Household Income:** \$122,821 [[1](#)]
- **Average Rent-to-Income Ratio:** 30.3% (This indicates that the average renter allocates just over the federally recommended 30% threshold of their gross earnings toward housing costs).
- **Overall City Median Household Income:** \$160,523 (This includes both homeowners and renters, showing that renter households generally earn less than the city-wide median). [

Financial Context for Moving to Pacifica

Because Pacifica is situated in high-cost San Mateo County, even with a robust renter household income above \$120,000, locals face highly competitive monthly costs. Depending on the property size, average market rents typically span between **\$2,600 for a 1-bedroom** up to **\$4,940 for a 3-bedroom** home.

Date: August 7, 2026

From : William “Leo” Leon and Kris Geiger, 111 Olympian Way, Pacifica CA 94044

RE: Public Comment for August 12, 2026 Hearing, City of Pacifica LCP Amendment Number 2-PAC-25-0079-2 (Short Term Rentals)

General Renter Landscape in Pacifica

- **Renter vs. Owner Occupancy:** Renters make up about **32%** of occupied households in Pacifica (roughly 4,500 units), while homeowners account for **68%**.
- **Median Renter Income:** The median household income for renters in Pacifica sits around **\$122,821**, which is lower than the overall citywide median household income of roughly **\$160,500–\$163,700**.
- **Average Rents:** Market-rate average rent in Pacifica is approximately **\$2,750 to \$2,800 per month**, resulting in an average rent-to-income ratio right around the 30% threshold.

Income Level Definitions (San Mateo County Area Guidelines)

- **Extremely Low / Very Low Income (0–50% of AMI):** Faces the highest severity of cost burden, often spending well over 50% of gross income on rent.
- **Low Income (50–80% of AMI):** Routinely qualifies for state or local affordable housing assistance programs.
- **Moderate Income (80–120% of AMI):** Often categorized as the local workforce or "missing middle" population needing stabilization.

If you'd like, I can provide more details on:

- The specific **RHNA housing allocations** for lower-income units in Pacifica's certified City Municipal Housing Element Updates
- Rates of **severe rent burden** (spending >50% of income) for local tenants

How does Pacifica's General Renter Landscape compare to that of Half Moon Bay and the unincorporated communities in San Mateo County in terms of the following categories: • **Renter vs. Owner Occupancy:** Renters make up about 32% of occupied households in Pacifica (roughly 4,500 units), while homeowners account for 68%. [1] • **Median Renter Income:** The median household income for renters in Pacifica sits around \$122,821, which is lower than the overall citywide median household income of roughly \$160,500–\$163,700. [1, 2, 3] • **Average Rents:** Market-rate average rent in Pacifica is approximately \$2,750 to \$2,800 per month, resulting in an average rent-to-income ratio right around the 30% threshold

Pacifica's coastal community layout shares many geographic attributes with Half Moon Bay and unincorporated coastal communities (such as Montara, Moss Beach, and El Granada), but their localized economic structures create clear differences in tenant dynamics.

Date: August 7, 2026

From : William “Leo” Leon and Kris Geiger, 111 Olympian Way, Pacifica CA 94044

RE: Public Comment for August 12, 2026 Hearing, City of Pacifica LCP Amendment Number 2-PAC-25-0079-2 (Short Term Rentals)

The categories compare across the regions as follows:

1. Renter vs. Owner Occupancy

- **Pacifica:** Holds a **32% renter occupancy rate** (approx. 4,500 units) compared to 68% homeowners. It serves as a dense coastal bedroom community balancing long-term resident homeowners and a notable rental market.
 - **Half Moon Bay:** Possesses a slightly lower renter profile, sitting at roughly **29% renter occupancy** (approx. 1,174 units) versus 71% homeowners. Its stricter localized building limits and high volume of luxury secondary coastal properties minimize standard multi-family tenant inventory.
 - **Unincorporated San Mateo County:** Varies widely by specific pocket, but features a significantly higher broad average of **~40% renter occupancy**. While coastal unincorporated enclaves (like El Granada or Montara) tilt strongly toward homeownership, heavily populated inland unincorporated areas like North Fair Oaks drastically pull the countywide unincorporated average up due to dense multi-family layouts.
-

2. Median Renter Income

- **Pacifica:** The median renter household income stands around **\$122,821** [1]. This tracks lower than the overall citywide median (\$160,500+) [1], revealing an income gap between local home buyers and wage-earning tenants.
- **Half Moon Bay:** Exhibits a lower estimated median renter income hovering around **\$95,000 to \$105,000**, starkly contrasting its high overall household median of \$162,759. This reflects a pronounced economic divide driven by a large service, agricultural, and hospitality sector workforce that supports the local tourism industry.

Unincorporated San Mateo County: Splintered heavily by geography. Coastal unincorporated regions match or exceed Pacifica's numbers due to tech-industry professionals renting single-family homes. However, the comprehensive unincorporated average drops due to lower-income pockets (e.g., Belle Haven or North Fair Oaks) where median renter household incomes traditionally sit below **\$60,000 to \$85,000**.

Date: August 7, 2026

From : William “Leo” Leon and Kris Geiger, 111 Olympian Way, Pacifica CA 94044

RE: Public Comment for August 12, 2026 Hearing, City of Pacifica LCP Amendment Number 2-PAC-25-0079-2 (Short Term Rentals)

3. Average Rents and Affordability

- **Pacifica:** Market-rate average rent sits at **\$2,750 to \$2,800 per month** for standard units (though broad-market single-family home indices push averages up closer to \$3,750).
- Its rent-to-income ratio hovers right at the sustainable **30% threshold** based on local renter incomes.
- **Half Moon Bay:** Shows a median gross rent of **\$2,233 to \$2,584 per month** across standard apartments, escalating past \$3,500+ for larger standalone single-family homes. Because median renter incomes here are lower, the rent-to-income ratio frequently breaches **33% to 38%**, signifying a much higher rent burden for local coastal service employees.
- **Unincorporated San Mateo County:** Commands the highest overarching rental premiums, with a broad county-wide average apartment rent sitting at **\$3,490 per month**. While inland urban tenants pay massive premiums for proximity to major tech hubs, coastal unincorporated renters mostly compete for sparse standalone single-family home rentals, forcing extreme rent-to-income ratios that regularly exceed the standard **35% cost-burdened mark**.

We request the Commission move to direct Staff to revisit the recommended No Cap on un hosted STRs in Pacifica. We feel that recommendation is not balanced and is not representative of other un-hosted coastal STR Caps in San Mateo County.

2026 Coastal Zone Night Caps by Jurisdiction San Mateo County

Unincorporated San Mateo County (El Granada, Princeton, Moss Beach, Montara)

180 nights per year. No annual cap Stays do not count against the 180-night limit on nights the property owner is physically present.

City of Half Moon Bay No annual cap 60 nights per year Applies to new STRs in residential/PUD districts. The property must be the operator's primary residence.

Date: August 7, 2026

From : William "Leo" Leon and Kris Geiger, 111 Olympian Way, Pacifica CA 94044

RE: Public Comment for August 12, 2026 Hearing, City of Pacifica LCP Amendment Number 2-PAC-25-0079-2 (Short Term Rentals)

City of Pacifica No annual cap Pending Activation / 60 nights While the city's ordinance sets a 60-night cap for un-hosted stays, as of August 2026, the California Coastal Commission is actively reviewing the implementation of these restrictions specifically for Pacifica's Coastal Zone.

In closing and most importantly, we reiterate our request that the Commission move to direct Staff to specifically revisit the recommended No Cap on un hosted STRs for Pacifica and return to the Commission with a recommendation is balanced and in line and representative of other un-hosted coastal STR Caps in San Mateo County.

Respectfully,

William"Leo"Leon

Anne"Kris" Geiger

Pacifica Residents

Date: August 7, 2026

From : William “Leo” Leon and Kris Geiger, 111 Olympian Way, Pacifica CA 94044

RE: Public Comment for August 12, 2026 Hearing, City of Pacifica LCP Amendment Number 2-PAC-25-0079-2 (Short Term Rentals)

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: Ringuette, Oceane@Coastal
Subject: FW: California Coastal Commission, Aug 12, 2026, Agenda Item 13b, City of Pacifica, LCP Amendment No. 2-PAC-25-0079-2 (STRs)
Date: Friday, August 7, 2026 3:48:37 PM

-----Original Message-----

From: Peter Loeb <peterloeb1@gmail.com>
Sent: Friday, August 7, 2026 3:44 PM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: California Coastal Commission, Aug 12, 2026, Agenda Item 13b, City of Pacifica, LCP Amendment No. 2-PAC-25-0079-2 (STRs)

[You don't often get email from peterloeb1@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

I don't understand why Commission staff now recommend removing the principal residence and the unhosted 60-night limit requirements from Pacifica's STR ordinance, when neighboring Half Moon Bay's ordinance, approved by the Commission, has the exact same provisions. What's so different about Pacifica? Why can't Pacifica's coastal residents protect their residential neighborhoods from becoming a commercial zone? It doesn't make any sense. Is there some reason that Pacificans are lesser qualified to prevent their residential neighborhoods from becoming commercial hotel zones? The 2 provisions that staff are recommending be removed are the 2 provisions that other jurisdictions have adopted, and for the same reason – to protect their neighborhood from having residences purchased by corporations or investors and then converted to full-time hotels. Why doesn't Pacifica get to have the same ordinance that has been approved by the Commission elsewhere? Is there something we did? Are we not good enough to be like other cities? We're just trying to keep our coastal residential neighborhoods from becoming commercial hotel zones. Please help us do that.

Peter Loeb
former Pacifica Mayor and City Council member Pacifica, CA

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: Ringuette, Oceane@Coastal
Subject: FW: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Friday, August 7, 2026 3:38:08 PM

From: Kathy Long <kathlong49@gmail.com>
Sent: Friday, August 7, 2026 3:37 PM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).

You don't often get email from kathlong49@gmail.com. [Learn why this is important](#)

To: the California Coastal Commission

I am writing to support the Pacifica ordinance to regulate short-term rentals. I have lived in the Pedro Point area of Pacifica for over 27 years and have always valued Pacifica and more particularly Pedro Point for the strength of its neighborhoods and the ability to know and depend on my neighbors.

Since the advent of unhosted short-term rentals, we have lost much of that feeling. I live on a narrow winding cul de sac with limited street parking and we now have by my count 5 short-term rentals on the street with the promise of more to come. I have been confronted with a drunk guy throwing up in my driveway and another person passed out in a running vehicle blocking the driveway. One of my neighbors came home from a late shift and found someone passed out on the steps to his house. There has been a marked increase in traffic and a definite increase in people speeding around the blind turn on our street.

There are multiple hotels and motels within a mile and many of them are less expensive to rent than the various short-term rentals. The city put a lot of thought into its STR ordinance and we are not targeting hosted STR's. Most other cities on the coast have regulated STRs and the Coastal Commission has approved them. Please do the same for Pacifica.

Kathleen Long
304 Olympian Way
Pacifica, CA 94044

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: [Ringuette, Oceane@Coastal](mailto:Ringuette,Oceane@Coastal)
Subject: FW: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Friday, August 7, 2026 9:46:11 AM

From: Michael Lunzer <michaellunzer@gmail.com>
Sent: Thursday, August 6, 2026 6:08 PM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).

You don't often get email from michaellunzer@gmail.com. [Learn why this is important](#)

Dear Chair and Commissioners:

My wife and I purchased our first house in the Park Pacifica neighborhood in March 2025. During our search, we noticed that many of the homes on the market were former short-term rentals, and ours was one of them. We were welcomed warmly by neighbors who told us they were glad to see a young family move in, and we've felt part of this community ever since.

I mention this because our home speaks to a question raised in the staff report. The report notes there's no guarantee that a former STR becomes long-term housing. In our case, and in properties we saw during our search, that's exactly what happened: a house that had been a vacation rental investment property is now a full-time home where we're raising our son, who was born just a few months ago.

I don't offer this as someone who wants to keep visitors away. We love sharing Pacifica — we bring friends and family from out of town to enjoy the beaches, the parks, and Sharp Park Golf Course, and I care about keeping the coast open to everyone. From what I can tell, the City's ordinance keeps that access intact: it preserves the 150-unit cap the Commission approved in 2024 and still allows unlimited hosted stays. What it thoughtfully limits is the whole-house, absentee-run rentals that my neighbors have found hardest to live alongside.

For those reasons, I'd respectfully ask the Commission to support Pacifica's ordinance as the City submitted it. We're proud to put down roots here for the long term. We believe this ordinance strikes a fair balance for a residential community like ours.

Thank you for your time and for the care you bring to these decisions.

Best,
Michael Lunzer

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: Ringuette, Oceane@Coastal
Subject: FW: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Friday, August 7, 2026 10:07:28 AM

-----Original Message-----

From: necesse@comcast.net <necesse@comcast.net>
Sent: Friday, August 7, 2026 1:08 AM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).

[You don't often get email from necesse@comcast.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear Commissioners,

It was recently brought to the public's attention that the ordinance has a flaw in the language.

The city needs to revise the permit language from regulating owners to dwellings.

I sincerely hope you will support this change because the ordinance has already had a positive impact on the community.

To begin, the logic behind affordable beach access is sheer nonsense. Look at the rates: they create barriers to access due to the egregious cost to stay in a STR by the beach. STR operators do not care about environmental justice or the environment itself. The volume of landfill generated by stays is astonishing and you don't see disenfranchised or lower income people at these STRs. Who can afford \$8000 a week?

The former nightmare STR on my street has a family. There are two environmentally savvy parents with great jobs and some remote flexibility; and they have a child enrolled in our public school. They are an active part of our neighborhood and shop local. They participated in a beach cleanup and love the culture of environmentalism here. Due to the size of this former STR, they've had friends and family come from other states to visit the beach. These stays are FREE. Can you think of a better outcome? If this ordinance does not get approved, they will be forced to move as it is returned to the STR category.

The other property went into the affordable housing market and has two families cohabitating. These residents are service workers and can afford to reside along the coast. They too are important members of our community. STRs not only create barriers to affordable accommodations, they remove critical housing stock.

San Francisco has an excellent ordinance. Sadly, the City of Pacifica did not get the proper legal guidance when drafting it.

Please continue to work with the City of Pacifica to revise the language so we can move forward with the ordinance.

Respectfully submitted,

Erin Macias

Pacifica

Sent from my iPhone

From: [JUDY MASON](#)
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Tuesday, August 4, 2026 2:41:36 PM

You don't often get email from judymason@mac.com. [Learn why this is important](#)

Hello,

I am writing to the CCC staff to ask it to change its thinking about the Coastside STRs. What was once my neighbor's home on Beach Boulevard in Sharp Park is now a full-time Airbnb that lists itself as able to sleep 30 (!) , welcomes events and parties, and charges \$2300 a night! To quote the CCC:

The Commission has historically recognized that STRs can provide a unique and important source of visitor-serving accommodation in the coastal zone, especially for families and groups, and has found that undue restrictions on this type of use are inconsistent with Coastal Act and LCP provisions prioritizing public access and visitor-serving opportunities and requiring that public recreational access opportunities be maximized.

How in the world does a middle-class family, much less low-income one, afford a single night, much less a weekend at these kinds of prices? It is absurd. And there are now Airbnbs, not owner-occupied, up and down Beach Boulevard charging these kinds of prices. This isn't public access. This is access for the elites and the corporations. I'm sure that the Airbnb reps and maybe even lawyers who talked to the CCC commissioners had all sorts of wonderful things to say about all the folks who use the Airbnbs on the coast. Of course they did.

I have no objection to the original idea of Airbnb and no objection to home owners making extra money for themselves. But I am disappointed that the CCC couldn't come up with some new ideas or compromises rather than just saying no to Coastside Pacifica. What about 300 Airbnbs instead of 150 ? What about some kind of rate limit on what people can charge guests ? What about if not owner-occupied, a site manager ? And on and on.

The CCC decision comes off as flat-out supporting the corporations and the rich. It is extremely disappointing and sad.

Thank you for your consideration.
Judy Mason

From: [Joel McIntosh](#)
To: NorthCentralCoast@Coastal
Subject: 13b. City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 Primary Residency requirement and 60 Day Per Year Maximum
Date: Tuesday, August 4, 2026 4:38:06 PM

You don't often get email from mcintoshj52@yahoo.com. [Learn why this is important](#)

Hello,

I am a 25 year resident of Pacifica. For the short term rental ordinance, I do not support deletion of the Primary Residency requirement. I also do not support deletion of the 60 day per year maximum rental nights, with no limits whatsoever. These two changes recommended by CCC staff would significantly reduce the effectiveness of our ordinance that was carefully crafted and approved unanimously by two City Councils and the Planning Commission over multiple meetings with a LOT of public input. Short term rentals are fundamentally altering the character of our town. Short term rentals are removing long term rentals from the marketplace. Please do not delete the primary residency requirement and do not delete the 60 day per year maximum.

Thank you,
Joel McIntosh

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: Ringuette, Oceane@Coastal
Subject: FW: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals)
Date: Friday, August 7, 2026 10:19:51 AM

From: Andrew Meiman <andrew.meiman@gmail.com>
Sent: Friday, August 7, 2026 9:16 AM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals)

You don't often get email from andrew.meiman@gmail.com. [Learn why this is important](#)

Commissioners –

My family and I have lived in Pacifica, in the coastal zone, for over 21 years. I am writing to support Pacifica's Short Term Rental ordinance as it stands and not weaken it as your Commission Staff recommends. I STRONGLY OPPOSE the Staff recommendations to both remove the Primary Residency requirement and to increase the 60-night unhosted maximum.

Without a Primary Residency requirement, corporate owners will stream in. **With corporate ownership and 90 unhosted nights, the Commission will actually be reducing coastal access compared to the ordinance as it stands.** With 90 unhosted nights, nearly every weekend could be rented throughout the year, leaving no practical way for someone to live in the home. However, 90 nights would provide enough rental income to remove any need for the corporation to secure a resident in the property. Therefore, the remaining 275 days of potential hosted visits will go completely unused. In contrast, a Primary Residence with 60 unhosted nights could also rent up to an additional 305 days in a year. Even if they only rented 25% of those remaining days, the as-is ordinance comes out far ahead with 136 rented days, providing access for more visitors over more of the calendar year. The break-even number of nights between these scenarios only requires 10% of the Primary Residents hosted nights to be rented, and in the meantime, the community gets a full-time resident, not an absentee corporate owner.

We have spent years as a community working through the issues and perspectives and have arrived at a strong, workable, implementable ordinance that required tough decisions and compromise. I believe our current ordinance strikes the right balance between visitor access, economics, and neighborhood preservation.

Sincerely,

Andrew Meiman

Pedro Point, Pacifica

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: [Ringuette, Oceane@Coastal](mailto:Ringuette,Oceane@Coastal)
Subject: FW: Short term rentals in Pacifica CA
Date: Friday, August 7, 2026 9:48:21 AM

From: Nina Mongiovi <ninamongiovi@gmail.com>
Sent: Thursday, August 6, 2026 8:19 PM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Short term rentals in Pacifica CA

You don't often get email from ninamongiovi@gmail.com. [Learn why this is important](#)

Our city is not for sale to the highest bidder. Short-term rentals take homes away from families, drive up housing costs, disrupt neighborhoods, and erode the sense of community that residents have worked for decades to build. We reject the idea that our neighborhoods should become revolving doors for vacationers while local workers, families, and seniors struggle to find stable housing.

We stand firmly opposed to the expansion of short-term rentals. Homes should be places where people live, raise families, know their neighbors, and invest in their community, not commodities used to maximize profits at the expense of those who call this city home.

We urge our elected leaders to put residents first by protecting long-term housing, preserving neighborhood character, and ensuring that our city remains a place to live, not a place to be exploited as a tourist business.

Sincerely,

Nina Mongiovi

A tax paying citizen and home owner

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: [Watson, Mandy@Coastal](mailto:Watson.Mandy@Coastal)
Cc: [Ringuette, Oceane@Coastal](mailto:Ringuette.Oceane@Coastal)
Subject: FW: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Monday, August 3, 2026 1:36:38 PM

From: Suzanne Moore <suzyqettu2@gmail.com>
Sent: Monday, August 3, 2026 12:00 PM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Cc: suzanne Moore <suzyqettu2@gmail.com>
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).

Honorable Commissioners and Staff,

I am in opposition to proposed amendments as suggested by your staff report and ask that Pacifica's Short Term Rental Ordinance be approved as submitted by the City of Pacifica.

I want to introduce my background: I am a retired Nurse Practitioner, a member of Pacifica Housing 4 All, and current sitting Board member for both the San Mateo County Healthcare for the Homeless and Farmworkers Board and the Pacifica Resource Center. My comments are my own.

I want to take exception to some of your staff findings:

1. "...there is no substantive basis for concluding that the proposed STR regulations will meaningfully improve the availability of housing stock in the coastal zone in Pacifica, particularly for low and moderate cost housing."

RESPONSE

In Pacifica's Needs Assessment of our Housing Element, the City acknowledges a scarcity of long-term rentals and suggests short-term rentals as a complicit factor. Indeed, Pacifica has a contracted rental market and the highest rents in the County - rates which far exceed income of essential workers. It is highly suspected that both scarcity and high rents have led to displacement and homelessness. Our low-income workers, disabled, elders, and young families are listed among our community's vulnerable members.

Pacifica and Coastal San Mateo County have the highest number of homeless in the County according to the 2026 Homeless Count. STRs in the Coastal Zone contribute to these tragic numbers and can be mitigated with a stronger STR ordinance. Too many low-income workers on the Coast are without safe, affordable housing.

2. "provisions would decrease such options, making public access more difficult in these areas, particularly for larger groups and families, underserved communities and

communities of color, and inland communities. In other words, LUP inconsistencies with the proposal are amplified when considered through an environmental justice lens.”

RESPONSE

It is difficult to image any justice lens which would prioritize short-term vacation housing over permanent housing for our low-income coastal residents. In San Mateo County’s recent Homeless Mortality Report, the County recognized that homelessness shortens life spans. In decades of studies on homelessness, data shows poor outcomes - deterioration of mental and physical health, social isolation with relocation, long-term impact on learning for students - all due to housing instability for **populations that are disproportionately the poor and people of color.**

The known causes of homelessness are poverty and lack of affordable housing. Until there is enough safe, affordable housing on the Coast, our communities must do what they can to protect our limited housing stock. Pacifica’s Short Term Rental Ordinance is one of our community’s effort to do just that.

Oppose staff recommendations and vote in support of Pacifica’s Short Term rental Ordinance as submitted. Thank you.

From: [Irma Mora](#)
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Saturday, August 8, 2026 1:35:34 AM

[You don't often get email from baden50@yahoo.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear Costal Commission,

Please protect our small town charm,
It is detrimental to our community changing and relaxing the requirements for Short Term Rentals,

When the owner is not on the premise, there is no safeguard for our community. We've had large parties and with lots of vehicles and prostitution happening, People getting sick and vomiting in the street.
If people want to buy places to rent, do it a commercial area not in small towns like ours! We pay a lot live in a peaceful community and not have all sorts unsavory people disturbing our peace, no more then 60 days annual rentals.

Thank you,

Irma Morawietz
Costal community member

From: [A Mutti](#)
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Thursday, August 6, 2026 2:43:54 PM

You don't often get email from almutti@gmail.com. [Learn why this is important](#)

To the coastal commission, we are losing neighborhoods to short-term rentals. Parties beer bottles thrown over fences, parking problems fights in the streets. Short-term rentals should be capped. Neighborhoods should be family neighborhoods not hotels.

From: [T. Neilands](#)
To: NorthCentralCoast@Coastal
Cc: [T. Neilands](#)
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Wednesday, August 5, 2026 10:26:20 PM

You don't often get email from veggie247@yahoo.com. [Learn why this is important](#)

August 5, 2026

California Coastal Commission

Re: LCP-2-PAC-25-0079-2 – City of Pacifica Short-Term Rental Ordinance

Dear Chair and Commissioners,

We are writing in support of the City of Pacifica's short-term rental ordinance as originally approved by the Pacifica City Council, including the primary residence requirement and the 60-night annual limit on unhosted rentals.

We have lived on Grand Avenue in the Pedro Point neighborhood of Pacifica for the past 18 years. During that time, we have personally experienced the negative impacts associated with nearby unhosted short-term rentals, including trespassing by visitors attempting to access the Pedro Point Headlands through our property; an incident in which I had to intervene after guests staying at an unhosted short-term rental on our street began preparing to set off illegal fireworks adjacent to flammable coastal vegetation near our home; increased traffic and parking impacts on our street; and excessive noise. These problems have been especially associated with investor-owned properties lacking full-time, on-site oversight.

We recognize that the Coastal Commission must balance the Coastal Act's goal of maximizing public access with the equally important need to protect established residential neighborhoods. In our view, the ordinance adopted by the Pacifica City Council achieves that balance.

We did not arrive at our support for this ordinance because it perfectly reflects our own preferences. Left entirely to our own preferences, we would favor prohibiting short-term rentals in residential neighborhoods because residential zoning exists principally to foster stable neighborhoods for people who live there. At the same time, we recognize the importance of welcoming visitors to California's coast. For that reason, we support the ordinance adopted by the Pacifica City Council because, after nearly eight years of public discussion and refinement, we believe it represents a thoughtful and carefully balanced compromise among competing interests.

Importantly, the ordinance continues to welcome visitors. Hosted short-term rentals remain fully permitted without any annual limit on hosted rental nights, and hosted operators may still rent their homes unhosted for up to 60 nights each year. Even under the 150-property cap, the ordinance still leaves substantial visitor-accommodation capacity: roughly 54,750 hosted STR nights per year, plus 9,000 unhosted nights. That is a robust amount of visitor-serving lodging, while still preserving neighborhood stability.

Our own experience illustrates why on-site supervision matters. In the fireworks incident described above, I—not a property owner or host—had to intervene to prevent guests from setting off illegal fireworks adjacent to flammable coastal vegetation near our home. Fortunately, they stopped and left peacefully before any fireworks were ignited. Had a responsible host been present, that intervention should never have fallen to a neighbor.

The primary residence requirement and the 60-night limit on unhosted rentals are what preserve this balance. They help distinguish home sharing from the commercial operation of absentee-owned lodging in residential neighborhoods. Removing those provisions would substantially change the character of the ordinance by allowing homes to function as year-round investment properties rather than owner-occupied

residences.

We also respectfully ask the Commission to consider the tangible results that Pacifica's ordinance has already begun to produce. We have personally noticed a significant reduction in traffic on our portion of Grand Avenue since the two cottages at 1561 Grand Avenue, formerly operated as short-term rentals, were converted to long-term residences. More broadly, we understand that former unhosted short-term rentals throughout Pacifica have already been sold or converted to long-term housing following adoption of the City's ordinance. That shows it is possible to return housing to residents while still preserving substantial visitor accommodations.

Nearby coastal communities also show that this approach is workable. Half Moon Bay's official ordinance remains in effect, is expressly framed as a balance between STR benefits and neighborhood preservation, still allows hosted rentals with no annual night cap, and limits unhosted rentals to 60 nights while requiring primary residence. San Francisco likewise permits short-term rentals only on a limited basis for primary residents. These examples show that reasonable guardrails do not eliminate visitor accommodations; they simply keep them tied to residential use.

We respectfully ask the Commission to certify the City of Pacifica's ordinance as adopted by the City Council, including the primary residence requirement and the 60-night annual limit on unhosted rentals. In our experience, these provisions are essential to maintaining the balance between welcoming visitors to our beautiful coastal community and preserving the residential neighborhoods that make Pacifica such a special place to live and visit.

Thank you for your consideration and for your service to the people of California.

Sincerely,

Tor Neilands
Dianne Seaborg
1580 Grand Avenue
Pacifica, CA 94044

From: [robert.odonnell](mailto:robert.odonnell@northcentralcoast.com)
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Thursday, August 6, 2026 2:03:42 PM

[You don't often get email from rjodfc@yahoo.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear Coastal Commission Members,

I am writing to you regarding the Pacifica Short Term Rental Ordinance under your review. My family was subjected to the negative consequences of Pacifica's old inadequate STR ordinance. Like so many other neighbors we were subjected to the negative consequences of a nearby STR.

We joined the ranks of other impacted citizens and petitioned our City Council for a revised and strengthened ordinance. We wanted to protect our neighborhoods from the problems of unhosted and uncontrolled "motels" plopped right in our midst with absentee landlords and corporations making big profits and leaving big problems right next to us. The City Council listened and enacted a strong new ordinance that balanced coastal access with new provisions that protect our neighborhoods. This new ordinance, as currently written, will curb the blight of uncontrolled "profit properties" in our neighborhoods of families.

This follows the lead of other cities near us that have also enacted strong STR ordinances. Half Moon Bay is just one example, and none of them have faced the Staff recommendation that your Staff has imposed on our Pacifica ordinance. Why is that?

Your Staff recommendations for changes to our ordinance would gut the provisions that are crucial to restoring protections to the community while still allowing access to the coast. Their recommendations dismiss the lived experience of hundreds of Pacificans who have lived through that inadequate previous ordinance and worked hard to bring about a stronger more balanced ordinance in all zones of Pacifica. My wife and I urge you to reject those Coastal Commission Staff recommendations and to approve our new ordinance as written. We can't go back to the past, the constant problems and the unfairness that old system.

Please accept the current new provisions of the Pacifica STR Ordinance for all zones in Pacifica.

Sincerely,

Robert and Jacqueline O'Donnell
1319 Aspen Dr. Pacifica CA. 94044

Jacqueline O'Donnell

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: Ringuette, Oceane@Coastal
Subject: FW: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Friday, August 7, 2026 1:04:54 PM

From: Peggy ODonnell <pacificapeg@me.com>
Sent: Friday, August 7, 2026 10:44 AM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).

You don't often get email from pacificapeg@me.com. [Learn why this is important](#)

Dear Members of the California Coastal Commission,

We are submitting this public comment because we strongly oppose the Coastal Commission's recommendation to remove the primary residence requirement and 60-night max on Unhosted STR Rental nights from Pacifica's STR Ordinance. We are Pacifica residents and have lived in our home here for 40 years. For 38 years we enjoyed living in our quiet neighborhood, where the homes around us were all single family residences. Approximately two years ago the property next door to us sold and was renovated into an unhosted short term rental that sleeps up to 16 guests. Living next to this unhosted STR has been disruptive to our lives, as we have had to deal with noise, garbage blowing onto our property, parking issues, and safety concerns caused by never knowing who is residing in the home next door. The situation has improved since the Pacifica City Council passed the new STR Ordinance, which limits the number of unhosted STR rental nights to 60 per year.

We support Pacific's new STR Ordinance, which supports HOSTED STRs by placing no restrictions on the number of nights a HOSTED rental may operate per year, and also provides HOSTED operators with the ability to rent out their homes as unhosted rentals for 60 nights per year. This new ordinance was created as a result of significant research, hard work, and community input, and was approved by the Pacifica City Council because it was considered to be a balanced approach that would accommodate the need for short term rentals for visitors, while respecting the community character and quality of life for full time residents of Pacifica.

We feel that it would be a disservice for the California Coastal Commission to make any change to the New STR Ordinance that was passed by the Pacifica City Council, as that would disregard the enormous amount of work that was put into creating and approving a solution that meets the needs of the entire City of Pacifica.

Sincerely,

Jim & Peggy O'Donnell

Sent from my iPad

From: [Christopher Oeffinger](#)
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Wednesday, August 5, 2026 11:45:34 AM

[You don't often get email from coeffinger@icloud.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

My name is Christopher Oeffinger. I am a lifelong resident of Pacifica. I love this town. My family and extended family go back generations here. To reverse the short term rental ordinance and allow foreign investors to turn this town into a vacation playground for the rich is a travesty of the highest order. To deny children the act of growing up in this wonderful town is despicable. Ruining neighborhoods that have existed since the formation of this great city is a crime. These wants are filled by pure greed and not an ounce of Pacifica pride.

So I put it to you Members of the council. I you here to keep Pacifica the great family oriented town it is? Or are you filled by greed and only care about people destroying generational neighborhoods to create vacation rentals? If it's vacation rentals you want Z why not build a grand hotel with plenty of amenities. Something that create jobs, leave neighborhoods intact, and full other local small businesses.

Sincerely Christopher Brook Oeffinger.
Sent from my iPhone

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: Ringuette, Oceane@Coastal
Subject: FW: Subject: Opposition to Pacifica STR Restrictions — Preserving the Inland-to-Coast Access Pipeline
Date: Friday, August 7, 2026 4:01:27 PM

From: brian o'flynn <bhof123@gmail.com>
Sent: Friday, August 7, 2026 4:00 PM
To: Harmon, Meagan@Coastal <meagan.harmon@coastal.ca.gov>; Hart, Caryl@Coastal <caryl.hart@coastal.ca.gov>; Escalante, Linda@Coastal <linda.escalante@coastal.ca.gov>; Jackson, Raymond@Coastal <Raymond.Jackson@coastal.ca.gov>; Kelley, Ariel@Coastal <Ariel.Kelley@coastal.ca.gov>; Lee, Jaime@Coastal <Jaime.Lee@coastal.ca.gov>; Lopez, Chris@Coastal <Chris.Lopez@coastal.ca.gov>; Lowenberg, Susan@Coastal <Susan.Lowenberg@coastal.ca.gov>; Notthoff, Ann@Coastal <ann.notthoff@coastal.ca.gov>; Preciado, Jose@Coastal <Jose.Preciado@coastal.ca.gov>; Wilson, Mike@Coastal <mike.wilson@coastal.ca.gov>; Vivian Moreno <Vivian.Moreno@coastal.ca.gov>
Cc: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>; ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>
Subject: Subject: Opposition to Pacifica STR Restrictions — Preserving the Inland-to-Coast Access Pipeline

You don't often get email from bhof123@gmail.com. [Learn why this is important](#)

To: California Coastal Commission

Subject: AUGUST 12, 2026 COMMISSION MEETING, ITEM W13b / LCP-2-PAC-25-0079-2 (PACIFICA SHORT-TERM RENTALS)

Opposition to Pacifica STR Restrictions — Preserving the Inland-to-Coast Access Pipeline

Dear Commissioners,

I write in opposition to Pacifica's proposed short-term rental restrictions, which directly undermine the public access mandates set forth in the California Coastal Act of 1976 (Public Resources Code §§ 30001.5 and 30210).

Pacifica occupies a uniquely vital geographic position. Because the official coastal boundary dividing the Greater Farallones National Marine Sanctuary (GFNMS) and the Monterey Bay National Marine Sanctuary (MBNMS) sits directly at Point San Pedro, Pacifica is the only coastal municipality in California that directly fronts both sanctuaries along its municipal shoreline.

Furthermore, it serves as the single most essential and accessible coastal gateway for millions of inland Californians residing in the Sacramento Valley, the Sierra Foothills, and Gold Country.

For inland residents spanning Sacramento, Placer, El Dorado, Yolo, Solano, and San Joaquin counties, Pacifica represents the closest open-ocean saltwater destination with full public infrastructure, connected seamlessly via major interregional transit corridors like I-80 and I-280.

Unlike winding northern routes or congested southern corridors, Pacifica offers direct freeway-to-beach transition.

Restricting the 150 STR permits that support these visitors cuts off the lodging pipeline necessary to make coastal access viable for millions of inland citizens. I urge the Commission to protect this vital gateway.

Sincerely,

Brian O'Flynn

From: [The Palmers](#)
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Thursday, August 6, 2026 3:38:26 PM

You don't often get email from dashiell41@aol.com. [Learn why this is important](#)

Dear reader,

As a long time resident of Pacifica I want to see the continuing efforts governing the laws restricting, and overseeing by our city as it pertains to short term rentals. Our neighborhoods are not designed for extra vehicles and the added noise, etc.. brought about by transient residents.

Respectfully submitted,

John & Claren Palmer
144 Angelita Avenue, Pacifica

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: Ringuette, Oceane@Coastal
Subject: FW: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Friday, August 7, 2026 5:01:52 PM

From: Carol Pan <carolleepan@gmail.com>
Sent: Friday, August 7, 2026 4:57 PM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).

You don't often get email from carolleepan@gmail.com. [Learn why this is important](#)

Dear Members of the California Coastal Commission,

I am writing to express my strong concern regarding the recent shift in the recommendation to remove the primary residence requirement for short-term rentals (STRs) from the City of Pacifica's ordinance.

While the State mandates the construction of more housing to accommodate the local population, allowing corporations to buy residential homes for use as unhosted STRs directly undermines this goal. This practice removes housing from the market, making it increasingly difficult for working families to purchase homes and remain in their communities.

Furthermore, I disagree with the staff's assertion that there is "no evidence STRs will go back to community for housing." Since Pacifica's new STR ordinance took effect last fall, numerous former unhosted STRs have either been sold or converted into long-term rentals, including: 488 Monterey, 1 Sequoia Way, 916 Park Pacifica, 1331 Aspen, 847 Arguello, 63 Kathleen Court, 84 San Jose, 1050 Yosemite, 425 Farallon, 279 Sterling, and 1159 Barcelona. That is 20 homes returned to the community.

I urge the Commission to maintain the restriction of one STR per operator and preserve the primary residence requirement and cap on unhosted rental nights. Without these protections, commercial vacation rental corporations can bypass regulations by purchasing multiple properties and naming different employees as the designated "natural person" operator. This commercialization threatens the community character of our towns.

Please reconsider your position and uphold the original STR restrictions to protect local housing and communities.

Sincerely,

Carol Pan
315 Olympian Way
Pacifica, CA 94044

Carol

carolleepan@gmail.com

+1 650-520-7740

From: [Colleen Marie Pauza](#)
To: [NorthCentralCoast@Coastal](#)
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Thursday, August 6, 2026 1:56:38 PM

[You don't often get email from cmpauza@me.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Please approve the ordinance as originally written and enacted by the city of Pacifica without any modifications.
Thank you.

Dr. Colleen Pauza
1426 Grand Ave
Pacifica (resident for 26+ years)

From: [Stefanie Phillips](#)
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals) UPDATED
Date: Wednesday, August 5, 2026 10:10:08 AM

You don't often get email from stefaniellphillips@gmail.com. [Learn why this is important](#)

UPDATED - I realized my my time lines were not accurate and I think are relevant

Dear Commissioners.

My name is Stefanie Phillips, and I have lived in Pacifica for over 25 years. I have rented the same place for almost two decades, and during that last decade my rent has more than tripled.

I work for our School District. I am not speaking as an expert or an organization. I am speaking as someone who is trying to continue living in the community where I work.

The staff report says there is no evidence that the primary residence requirement and the 60-day limit will preserve housing. Respectfully, I ask you to consider the lived experience of people like me.

The neighborhood where I live, within the Coastal Zone, used to consist primarily of long-term rentals. Over the past decade, I have watched homes that once housed local families get purchased by investors and converted into short-term rentals because they are close to the beach.

A home that sold for around \$500,000 ten years ago now sells for well over \$1 million. Those homes are increasingly being purchased not by young families or local workers, but by people looking to maximize income through vacation rentals.

Every home that becomes a full-time short-term rental is one less opportunity for someone like me—a school employee, restaurant worker, first responder, or other essential worker—to remain in Pacifica.

The existing 150-unit cap is important, but by itself it does not prevent homes from being purchased solely for commercial vacation rental use. The primary residence requirement and the 60-day limit do. Those provisions ensure that short-term rentals remain a way for residents to earn supplemental income, rather than creating an incentive for investors to purchase housing solely as a business. The Airbnb model has changed my neighborhood dramatically and not for the better.

If those protections are removed, I fear the remaining rental housing in my neighborhood will continue to disappear. If I lose my current home, I honestly do not know if I will be able to find another rental that I can afford in the community where I have worked and lived for nearly 20 years.

Coastal access is important, but so are the people who keep coastal communities functioning. Visitors need places to stay, but our schools, restaurants, businesses, and public services also

need people who can afford to live here.

I respectfully ask you to uphold the City's primary residence requirement and the 60-day limit so Pacifica can remain a community, not just a destination.

Thank you.

Stefanie

From: [Terry Piccolotti](#)
To: [NorthCentralCoast@Coastal](#)
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Thursday, August 6, 2026 1:03:58 PM

[You don't often get email from tap767@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Please keep the current guidelines in place
Teresa Piccolotti

Sent from my iPhone

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: Ringuette, Oceane@Coastal
Subject: FW: August 2026 City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals). City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2
Date: Friday, August 7, 2026 10:13:43 AM
Attachments: [image.png](#)
[image.png](#)

From: Pam Raymond <raymond.pam@gmail.com>
Sent: Friday, August 7, 2026 8:23 AM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: August 2026 City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals). City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2

This is an accurate email from me, please disregard the last email. THANK YOU.

Esteemed Commissioners,

I am writing today to urge you to sensibly open your eyes and see what is happening with Airbnb's last ditch effort to delay February's hearing by sending in their lobbyist to bat against the future of Pacifica. Can't you see through the tactic of burying your staff with 300 plus pages of repetitive analytics that they are desperately trying to keep their hands on the throat of this community? We as a community have been meeting over this issue for eight years with two city councils.

Denying accessibility:

These unhosted, unregulated STRs in the coastal zones do not offer the public access your staff touts.

I live amongst the STRs listed below in the overly concentrated West Sharp Park and Beach Blvd

area.

The reason they were able to concentrate this area was due to the extremely weak current STR ordinance for the coastal zone. Out of town investors have bought up properties and turned them into unhosted and unregulated hotels, taking much needed long-term housing opportunities from families.

I won't repeat stories of the sleepless nights due to late night noises, and the flotsam and jetsam that comes from whole house STRs. The biggest "side effect"- lack of parking. The large parties in many vehicles show up and take up most available spaces that displace daily visitors. All varieties of visitors come, whether it is the regulars who are getting their regular fresh air with a walk, bicycle, jog, or for those with mobility issues and other disabilities, wheelchair, walker, specialized scooter, etc.

Denying affordability:

Page 10 of Staff Recs: LUP Policy LD-I-6: LOWER COST VISITOR AND RECREATIONAL FACILITIES *Protect, encourage, and where feasible, provide lower-cost visitor and recreational facilities in the Coastal Zone. These include major, free recreational attractions such as the Pacifica Pier (RIP) and Pacifica State BEach; the public golf course at Sharp Park; the S.F. RV Park; California Coastal Trail and other trails, lower cost overnight accommodations; and*

numerous beaches accessible at no cost.

The two Airbnb listings (below) are on the block where I live. The first one is listed as a 10-bedroom home, which was converted from a 6-unit apartment building over time. The usual nuisances that came with an unhosted STR of this size is nothing compared to this price tag. \$10,368 for 4 nights! That's a pretty penny for coastal access. This does not even come close to "lower cost overnight accommodations". In fact, maybe if this same property were to be a hosted STR where rooms could be rented individually, I think they could be listed for a fraction of \$10,368. One tenth of that is \$1036 for 4 nights, much more affordable but still steep for visitors. And more "nights stayed per visitor". Maybe the city can issue more than 150 permits for hosted STRs and that could be the balance we could agree upon. This is after all the original founding concept of Airbnb....rent out your extra room for a little income, and expand tourism.

The way it stands now is, a couple handfuls of out-of-town operators are reaping the benefits of these sky-high, elitist rates, and Airbnb, VRBO et al are getting their cuts. More LLCs will come and buy available property and it will keep going on ad infinitum. How on earth is this equal access for all to our coast, which the Coastal Commission claims to want to foster?

There are some responsible STR operators, but in

reality, any operator that is not on site is negligent. At midnight, when the parties take a dangerously loud turn, it's the neighbors and the police that are managing these properties, not the hosts. We need to stick to the stricter, original ordinance of 60-day limits* on unhosted STRs and primary-residence requirements, otherwise Pacifica will be just a pawn for Airbnb. The ONLY pawn, since you approved the 60-night limit for non hosted nights AND the primary-residence requirement for Half Moon Bay and Santa Cruz, and most or maybe all other California coastal cities. Pacifica is a sitting duck if you do not address this inconsistency with your rulings. This is not a case of YIMBY v NIMBY, it is a case of corporate greed vs. community survival. Please adopt the ordinance as it was submitted in February 2026.

*(or 90-day limits if staff is so worried about how many "nights stayed will dwindle due to restrictions")

Sincerely,
Pam Raymond

Ocean front 6000 sq House

[Share](#) [Save](#)



Entire home in Pacifica, California

16+ guests · 10 bedrooms · 18 beds · 6 baths

★ 4.9 · [21 reviews](#)



Hosted by Lance

Superhost · 9 years hosting



In coastal Pacifica, right on the beach

Steps from Sharp Park Beach, with coffee shops, restaurants, and live music within walking distance

Prices include all fees

\$10,368 for 4 nights

CHECK-IN
10/13/2026

CHECKOUT
10/17/2026

GUESTS
10 guests

[Reserve](#)



Entire home in Pacifica, California

4 guests · 2 bedrooms · 3 beds · 2 baths



One of the most loved homes on
Airbnb, according to guests

4.89
★★★★★

326
Reviews



Hosted by Gwen

Superhost · 8 years hosting



Right on the beach in Pacifica

Prices include all fees

\$1,575 for 3 nights

CHECK-IN
10/11/2026

CHECKOUT
10/14/2026

GUESTS
4 guests

\$0 today · Free cancellation before September 11

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: [Ringuette, Oceane@Coastal](mailto:Ringuette,Oceane@Coastal)
Subject: FW: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Friday, August 7, 2026 1:05:08 PM

-----Original Message-----

From: hailing-airless-5h@icloud.com <hailing-airless-5h@icloud.com>
Sent: Friday, August 7, 2026 11:13 AM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).

[You don't often get email from hailing-airless-5h@icloud.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

My name is John Raymond and I have lived on Beach Boulevard in the coastal zone of Pacifica for 40 years. I am writing to request that the City of Pacifica short term rental ordinance be approved. The proposed primary residence requirement and 60-night unhosted STR limit are necessary to stop the runaway price increases of STRs in the coastal zone. In my neighborhood, the nightly price of an STR often exceeds \$2000. This limits access to the coast to a wealthy elite. The primary residence and 60 day unhosted limit will bring the price of STRs down to a range accessible to far more people. It will preserve neighborhoods and prevent corporations from investing in coastal property and charging exorbitant prices. The amount of nightly rentals will not go down because hosted rentals will proliferate at much more reasonable prices that will be accessible to all. I would suggest increasing the amount of permits allowed as long as the 60 day limit and primary residence requirement remain to be sure that the amount of nightly rentals increase or remain stable so that coastal access will remain robust.

John Raymond
Johndanaraymond@gmail.com

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: Ringuette, Oceane@Coastal
Subject: FW: Public Comment: Support for Pacifica's Short-Term Rental Ordinance as Adopted – Agenda Item 13.b
Date: Friday, August 7, 2026 3:54:28 PM
Attachments: [Exhibit D.png](#)
[Exhibit C.png](#)
[Exhibit B.pdf](#)
[Exhibit A.pdf](#)
[Exhibit E.png](#)

From: Lyla Reinero <lyla.reinero@gmail.com>
Sent: Friday, August 7, 2026 3:51 PM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Cc: Bryan Reinero <breinero@gmail.com>
Subject: Public Comment: Support for Pacifica's Short-Term Rental Ordinance as Adopted – Agenda Item 13.b

Dear Chair Harmon and Honorable California Coastal Commission Members,

I am writing to provide additional comments regarding Agenda Item 13.b following my previous submission in support of Pacifica's Short-Term Rental (STR) ordinance as adopted by the City Council. After reviewing the Commission staff report and the proposed modifications, I respectfully urge the Commission to approve Pacifica's Local Coastal Program amendment as adopted, including the primary residence requirement and the 60-night annual limit on unhosted short-term rentals.

As I noted in my previous comments, Pacifica's ordinance represents a thoughtful balance between providing visitor accommodations and protecting the limited housing supply and neighborhood stability of a coastal community. The ordinance already allows **unlimited hosted short-term rentals**, enabling residents who live in their homes to provide visitor accommodations while maintaining accountability and preserving homes for permanent residents.

My additional concern is that removing the primary residence requirement and the 60-night annual limit would create a disproportionate impact on residents living within the Coastal Zone. If different short-term rental regulations remain in place east of Highway 1, residents outside the Coastal Zone would continue to benefit from stronger restrictions. In contrast, Coastal Zone residents would be uniquely exposed to increased investor-owned, full-home, unhosted short-term rentals. This would create an inequitable situation where the impacts of expanded commercial STR activity are concentrated in the very neighborhoods where the Coastal Act seeks to protect the long-term health and character of coastal communities.

Operating under two separate short-term rental regulatory systems within the same city would also create significant practical challenges. A Coastal Zone ordinance and a separate non-coastal ordinance would be more difficult for residents,

property owners, and City staff to understand, administer, monitor, and enforce. Enforcement of STR regulations is already challenging; creating different rules based on location within the same community would add unnecessary complexity and make consistent implementation more difficult. A uniform citywide ordinance provides greater clarity, fairness, and accountability for everyone.

The experience of Marbella Lane provides a real-world example of how these regulations affect corporate-operated short-term rentals. Based on my tracking of Marbella Lane's Pacifica listings over time, the company operated **at least 20** full-home, unhosted short-term rentals in Pacifica before the City's ordinance took effect in the non-coastal area. Today, Marbella Lane's own website lists six remaining Pacifica properties. Of those six properties, only three are currently operating as short-term rentals within the Coastal Zone. The other three properties are located in the non-coastal area and are now subject to the City's restrictions, including 31-night minimum stays.

This example demonstrates that local regulations have been effective in reducing the concentration of corporate-operated, full-home short-term rentals in areas where restrictions apply. If the primary residence requirement and 60-night cap are removed within the Coastal Zone, those same protections would no longer apply there. This would allow corporations and commercial operators to acquire and operate additional full-home, unhosted short-term rentals in Coastal Zone neighborhoods, increasing pressure on housing availability and accelerating the conversion of residential homes into commercial lodging.

My family's experience further illustrates why the primary residence requirement is important. For the past seven years, the house directly across the street from our home has been owned by an out-of-state, absentee investor and operated as a short-term rental by a corporation rather than by someone who lives in the neighborhood. During that time, the continual turnover of guests resulted in repeated neighborhood disturbances and required dozens of police responses, including incidents involving vandalism to our property. Nobody should have to live in fear of their personal safety in their own home.

The impacts have extended beyond our day-to-day quality of life. When my family was searching for our forever home, we would not have purchased this property had these recurring problems already existed. Today, because these issues have become a longstanding feature of our neighborhood, they also affect the value and marketability of our home. If we were to sell, we would have to consider whether these recurring disturbances and neighborhood issues should be disclosed to prospective buyers. It is deeply concerning that the consequences of a commercially operated short-term rental can extend beyond daily disruptions to potentially affect one of a family's largest investments.

The lack of a locally accountable owner has also created significant maintenance and safety concerns. Following one

winter storm, a mudslide from the neighboring property caused damage to our property. During another storm, a large tree branch fell across the roadway, blocking access for our neighbors. That same tree remains unstable today and continues to be a concern as another rainy season approaches.

The property also included an illegally converted garage that the City red-tagged as unsafe for occupancy. Despite the City's determination that the unit was unsafe, it continued to be offered to guests. I have attached a photograph of the City's red-tag notice along with screenshots from the listing platform, including a guest review stating that they were told it was acceptable to stay in the unit despite the red tag. These documents provide firsthand evidence of the challenges that can arise when a remotely owned, commercially operated short-term rental lacks meaningful local oversight and accountability.

Throughout these and other issues, the property owner has been effectively unreachable, making it difficult to address problems before they become more serious.

One additional aspect of this experience illustrates the challenges created by absentee-owned, corporate-operated short-term rentals. After repeated disturbances involving noise, parking, garbage, and other neighborhood impacts associated with the property, my family received two letters from attorneys representing the property owner and Marbella Lane. The first letter requested that we stop contacting the police regarding disturbances at the property. The second warned that if we contacted law enforcement again, it would be our final opportunity to avoid legal action. I have attached copies of both letters for the Commission's review.

For my family, this experience underscored the imbalance that can exist when neighboring residents are forced to address recurring problems created by a remotely owned, commercially operated short-term rental. Rather than being able to work directly with a local homeowner, we found ourselves dealing with corporate representatives and legal counsel. These experiences demonstrate why connecting STR activity to a local resident matters. The concern is not simply where an owner lives, but whether there is a meaningful local connection and accountability for the impacts created by the rental activity. When the person benefiting from a rental lives outside the community and the property is operated as a commercial lodging business, there may be little incentive or ability to respond quickly when problems arise. The primary residence requirement helps ensure that short-term rental activity remains connected to the people and neighborhoods where it occurs.

I also respectfully encourage the Commission to carefully evaluate all comments submitted regarding this matter, including those from organizations with a direct financial interest in expanding short-term rental activity. I ask the Commission not to allow advocacy from industry participants, including Airbnb, to outweigh the extensive local process undertaken by the City, the City's experience administering its STR regulations, the documented effects of those regulations, and the firsthand experiences of Pacifica residents. The

adopted ordinance reflects years of local discussion, compromise, and consideration of Pacifica's unique circumstances. Those local facts and experiences deserve significant weight in the Commission's decision.

I respectfully ask the Commission to consider the ordinance as a complete package and recognize that the City Council's adopted version already provides meaningful visitor accommodations while addressing the real-world impacts experienced by Pacifica residents. The City spent years engaging residents, evaluating community impacts, and developing a balanced approach tailored to local conditions. Approving the amendment as submitted would respect that extensive local process while advancing the Coastal Act's goals of protecting public access and sustaining healthy coastal communities. Plus, it's the right thing to do.

Thank you for your time, thoughtful consideration, and continued work protecting California's coast and coastal communities.

Sincerely,

Lyla Reinero
Founding Member, Pacifica Homes Are Not Hotels
Pacifica Police CERT Member
Concerned Citizen and Parent

LAW OFFICES
PETER L. BALOGH
15 West Manor Drive
PACIFICA, CALIFORNIA 94044

Telephone (650) 355-8834
Facsimile (650) 355-7342
Email pbalogh@pacificallawyer.com
www.pacificallawyer.com

Via First Class Mail

August 28, 2020

Lyla A. Reinero
Bryan R. Reinero



Re: Airbnb at 400 Belfast Avenue, Pacifica, California

Dear Mr. and Mrs. Reinero:

I am writing to you on behalf of Marbella Lane Vacation Rentals and the owner of 400 Belfast Avenue, Christopher Chang who, as you know, conducts a short-term rental at said residence.

I know that both of you, along with another neighbor, [REDACTED] have had issues with Airbnb guests at various times for various reasons at that residence. I have reviewed documentation from Airbnb and its guests, from the Pacifica Police Department and discussed the matter with Marbella Lane Vacation Rentals.

First, Marbella Lane has already taken numerous steps to try to remedy any noise issues with the guests, including putting in a noise measuring device in the house and installing cameras at certain locations to ensure there are no violations of house rules. They have also made very specific rules regarding noise and smoking to ensure that any issues with the neighbors are minimized. Guest limits are specified and strictly enforced. We are happy to share with you the rules that have been implemented and are open to further suggestions that you might have in that regard.

Still, we realize that situations sometimes develop that may impact the neighbors. Marbella Lane and Mr. Chang want to do whatever is possible to respect your needs and concerns so that both parties can exist peaceably. We want to do what we can to prevent you from having to contact the Pacifica Police Department or disrupting the guests who are staying at the property and trying to enjoy it.

Perhaps we can provide you a phone number for Management to call if there is an issue? Or, implement some other solution that we have not thought of? Please provide us with any suggestions you may have to improve the situation.

We want to avoid unnecessarily bringing in the police department or disturbing the guests.

We welcome your suggestions or proposals in this regard.

Thank you.

Sincerely,



Peter L. Balogh

c.c. 

LAW OFFICES
PETER L. BALOGH
15 West Manor Drive
PACIFICA, CALIFORNIA 94044

Telephone (650) 355-8834
Facsimile (650) 355-7342
Email pbalogh@pacificallawyer.com
www.pacificallawyer.com

Via First Class Mail

September 30, 2020

Lyla A. Reinero
Bryan R. Reinero


Re: Airbnb at 400 Belfast Avenue, Pacifica, California

Dear Mr. and Mrs. Reinero:

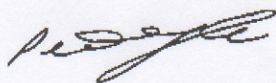
I am writing to you to follow-up regarding my letter of August 27, 2020 for which I did not receive any response. It's unfortunate that you have decided not to work with us amicably to try to resolve any issues you might have with my clients legal and valid business. We reached out to you in a good faith effort to see if we could do anything to meet your needs or to work this out without resort to legal action. Unfortunately, you have decided not to respond and instead once again have resorted to contacting the police and disturbing the guests who are paying to enjoy their time at my client's Airbnb.

As I mentioned in the letter, my clients have been monitoring the noise and also have extensive video that is in sync with the time that you've made your complaints. Your complaints are not only unfounded but have resulted in damage to my client's business which is actionable as intentional interference with business relations and as nuisance as well. My clients have the resources and ability to bring this to court and pursue any and all remedies. That was not our first choice and it is not our choice now but you are forcing them to take that choice. Resolving this in the courts would certainly not be the preferred path for anyone involved. Trust me. With 30 years of litigation experience, I can tell you that it's best to resolve this amicably.

In either case, since you have not responded we have no choice. This is our last attempt to try to work with you to develop means for you to avoid calling the police and disrupting the Airbnb guests' peaceful stay, which in turn affects my client's business. Your actions have caused guests to be disturbed, negative reviews to be written, and have caused a damaging economic consequence. This will all be pursued unless we can resolve this amicably without resort to calling the police.

Unless we receive a positive response from you in an attempt to resolve this, my clients will be taking all necessary action to mitigate the damages you are causing to their business.

Sincerely,

A handwritten signature in dark ink, appearing to read "P. Balogh", written in a cursive style.

Peter L. Balogh

c.c Donald G. Lauer
Matthew Lauer

UNSAFE

DO NOT ENTER OR OCCUPY
(THIS PLACARD IS NOT A DEMOLITION ORDER)

This structure has been inspected, found to
be seriously damaged and is unsafe to
occupy, as described below:

Date 9/3/24

Time 12:00

*Building is unpermitted
and in Public Right of Way*

This facility was inspected under
emergency conditions for:

(City of Pacifica)

Do not enter, except as specifically
authorized in writing by jurisdiction.
Entry may result in death or injury.

Inspector ID / Agency

*Fred Cullen
CIBO*

Facility Name and Address:

400 Belmont



info@cityofpacificacalifornia.gov

Fred Cullen
Contract Building Official
Building Department

tel 650.738.2455
fax 650.359.5807



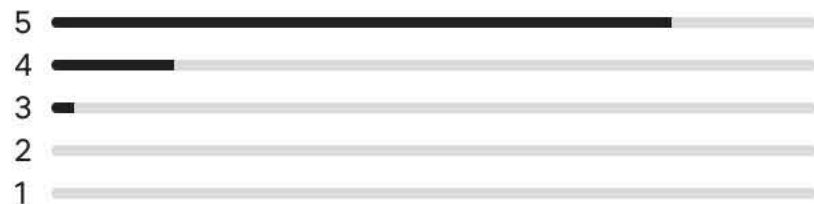
OFFICE ADDRESS: 540 Crespi Drive
CITY HALL: 540 Crespi Drive Pacifica, California 94044

Not Remove, Alter, or Cover this Placard
until Authorized by Governing Authority



★ 4.78

Overall rating



 Cleanliness 4.8

 Accuracy 4.8

 Check-in 4.9

 Communication 4.9

 Location 4.8

 Value 4.6

201 reviews

Most recent ▼

🔍 Search reviews



Leah

Berkeley, California

★★★★★ · 1 week ago · Group trip

House was very clean w/ fantastic views of water & beach & worked well for our group. The guest house's smart lock's battery was dead when we arrived. The company rep. quickly directed us to a lock box w/ keys. The management company uses the "Boarding Pass" app to provide info via links to the app in AIRBNB messages. I had to give Boarding Pass my credit card info for a security deposit in order to receive the check in instructions. Check in is 4pm & checkout is 11am. Thru the app I was offered early & late check in/out for over \$100 ea. but you can't ask for an early check in until after 1pm on arrival day. The driveway to the house is extremely steep & would be impossible for low riding cars. Our Honda CRV w/o passengers inside had warning lights go off due to scraping on concrete. On the outside of guest house we found a red tag notice from the city saying it was "unsafe to occupy" because it was "unpermitted & in the public right of way." Company rep promptly said bldg was safe4us

Destination

Pacifica

Check In - Check Out

Start Date → End Date

Guests

Number of Guests...

Search

Searched Matches in [Pacifica](#)

Explore vacation homes in **Pacifica**



PACIFICA, CALIFORNIA

Oceanfront Retreat w/ Stunning View

3 Baths 6 Guests 3 Beds

\$5,000.00 Per Night 4.5 29 Reviews



PACIFICA, CALIFORNIA

Marbella Lane - 3BR Designer Home in Pacifica

1 Baths 6 Guests 3 Beds

\$495.00 Per Night 4.8 69 Reviews



PACIFICA, CALIFORNIA

Chic Abode w/Mountain Skyline

3 Baths 8 Guests 4 Beds

\$495.00 Per Night 4.8 85 Reviews



PACIFICA, CALIFORNIA

Home With Majestic Ocean Views

3 Baths 8 Guests 3 Beds

\$695.00 Per Night 4.5 55 Reviews



PACIFICA, CALIFORNIA

Oceanfront w/unobstructed views!

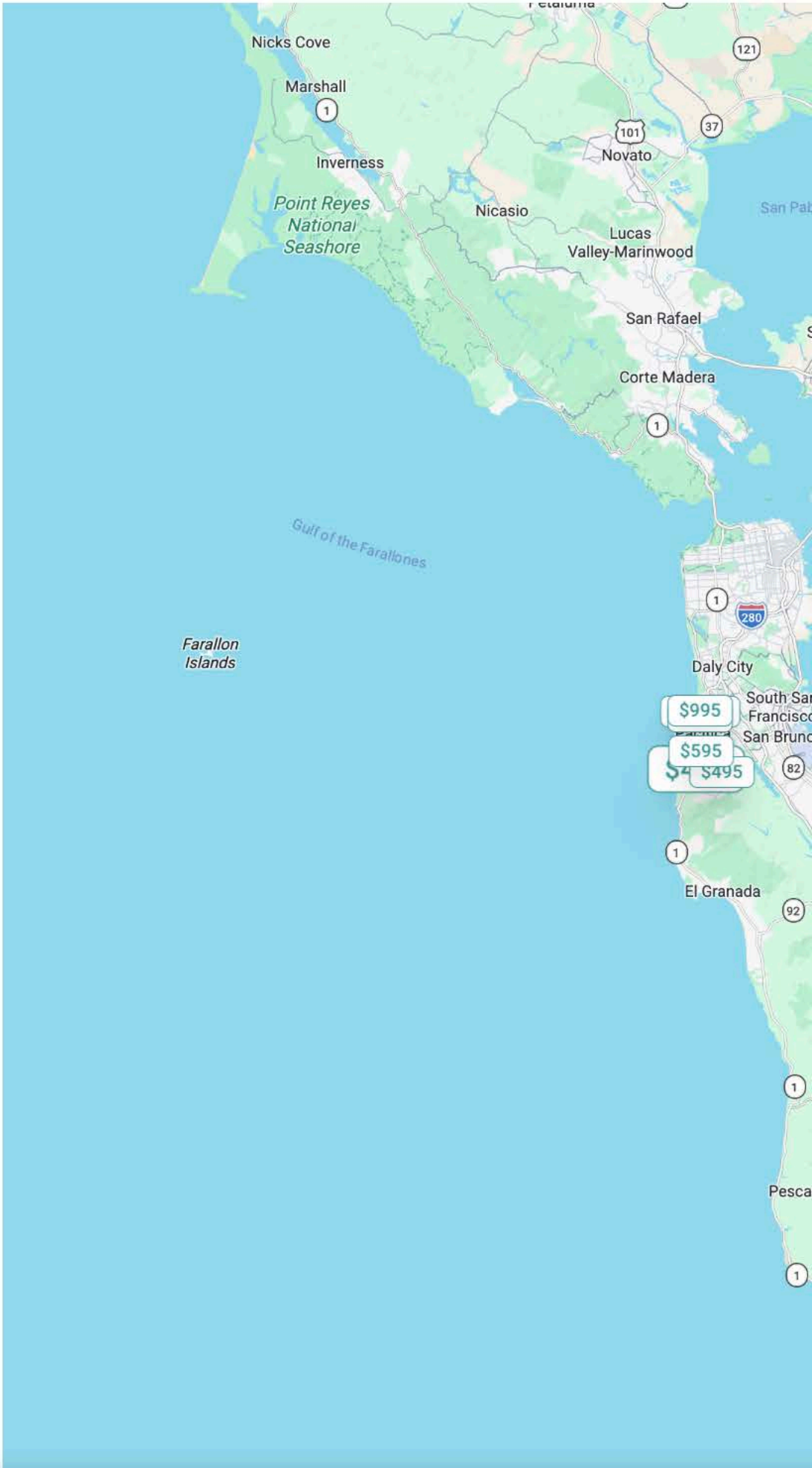
3 Baths 10 Guests 3 Beds



PACIFICA, CALIFORNIA

KnollTop Property | HotTub

2.5 Baths 12 Guests 4 Beds



From: [Travis, Galen@Coastal](mailto:Travis_Galen@Coastal)
To: [Ringuette, Oceane@Coastal](mailto:Ringuette_Oceane@Coastal)
Subject: FW: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Friday, August 7, 2026 5:01:55 PM
Attachments: [image.png](#)
[image.png](#)
[image.png](#)

From: Bryan Reiner <breinero@gmail.com>
Sent: Friday, August 7, 2026 4:56 PM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).

You don't often get email from breinero@gmail.com. [Learn why this is important](#)

My name is Bryan Reiner. I'm a founding member of **Pacifica Homes Are Not Hotels**, a community organization representing hundreds of Pacifica residents who have spent more than three years working collaboratively with our City to update our short-term rental ordinance.

Throughout this long process, Pacificans have acted with patience, diligence, and deep respect for the regulatory process. Residents devoted hundreds of volunteer hours writing to local leaders and Commissioners, attending City Council meetings and special study sessions, and working collaboratively to support the development of a thoughtful, balanced ordinance. Over these many years the ordinance has been subject to debate, comment, and scrutiny by the City Council, the Pacifica Planning Commission, residents, and STR operators from within and without Pacifica. The ordinance was also crafted based on the 2024 feedback from the California Coastal Commission itself.

This determined and resolute effort of the people culminated in the unanimous approval of the ordinance by the Pacifica City Council. Now, residents of Pacifica have been eagerly awaiting Coastal Commission approval of Pacifica's ordinance in the Coastal Zone. We've been working on this ordinance for more than eight years. During that time the people of Pacifica have endured the damaging effects of the unchecked proliferation of unhosted STRs—effects that have fundamentally altered neighborhoods, strained public safety resources, and caused economic harm to our community.

Unchecked STR proliferation has also created **serious safety risk for visitors**, as profit-driven operators exploit gaps in enforcement. Many unhosted STRs contain unpermitted garage conversions and overcrowded sleeping arrangements that have never been inspected.

I am including this picture of 400 Belfast Ave. The STR across the street from my own home advertised accommodations for twelve people in a 1,080-square-foot house with an unpermitted converted garage.



These units often lack fire-rated doors, secondary egress, panic hardware, or other basic life-safety features. They are ***not ADA-compliant***, and in an emergency—particularly involving children, elderly guests, or people with disabilities—the consequences could be tragic. This is not a hypothetical risk; it is an imminent danger. STRs actively reduce access to the coast for persons with disabilities.

Consider this VRBO review of the Marbella Lane property 1987 Beach Boulevard

@ Marbella Lane - Home With Majestic Ocean Views

Guest reviews

8.6/10 Excellent
63 verified reviews

What guests liked

- The property's location offers stunning ocean views, is situated across from the beach, and is close to local amenities and attractions. (15 reviews)
- The beach location offers a peaceful and enjoyable experience with great views, walks, and opportunities to see ocean life. (6 reviews)
- Beautiful ocean views and stunning sunsets were enjoyed from the living room. (3 reviews)

From real guest reviews summarized by AI

Cleanliness: 9.4
Check-in: 8.6
Communication: 8.8
Location: 9.0

[See more](#)

All reviews

Transfer type: [Reviews with photos](#)

Sort by: [Most recent](#)

2/10 Terrible

We booked this home specifically because it was advertised as wheelchair accessible. Unfortunately, it was anything but. There were several steps just to enter the home. Once inside, the main living area, kitchen, and ocean-view were only accessible by a large staircase. Although there was one bedroom downstairs, our wheelchair-bound family member had no access to the main amenities or the beautiful view that we rented the home to enjoy. I reread the listing after we arrived to make sure I hadn't missed something, but it did not clearly disclose that the primary living space required climbing a full flight of stairs. Had it been accurately described, we would have booked another property. Adding to the frustration, the next-door neighbor asked us not to use the front door because it created too much noise. Unfortunately, the front door was the only entrance that allowed us to get our family member's wheelchair into the home. The garage entrance had a large board across the threshold that required stepping over, making it inaccessible. The rooms were clean, and the ocean view was beautiful. However, the balcony and exterior were in need of repair. We also requested an early check-in. While we understand it couldn't be accommodated, we had to reach out multiple times before receiving a final determination. It would've been easier to decline. The view was 10/10. The accessibility was 0/10. Most importantly, the listing did not accurately capture accessibility.

[Show less](#)

Liked: cleanliness, check-in, communication, location
Disliked: listing accuracy

Lisa M.
Stayed 2 nights in Jul 2026
Verified review

8/10 Good

Joshua V.
Stayed 5 nights in Jun 2026
Verified review

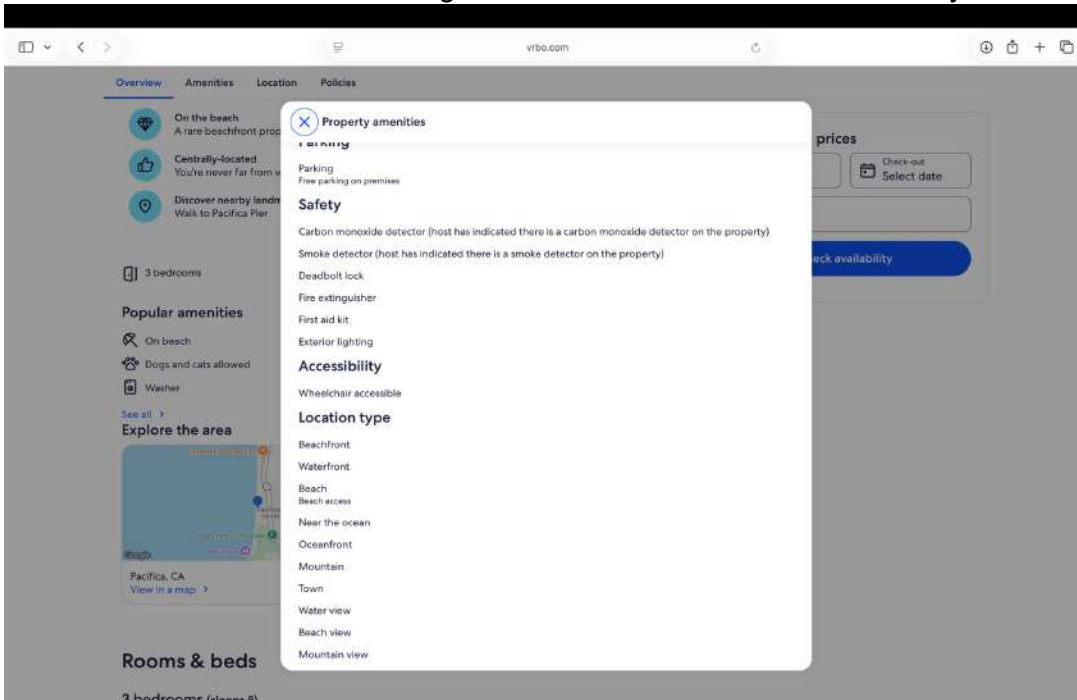
3 bedrooms
3 bathrooms
83 Sleeps 8

I will include the text of the review in case the image can't be seen.

"We booked this home specifically because it was advertised as wheelchair accessible. Unfortunately, it was anything but. There were several steps just to enter the home. Once

inside, the main living area, kitchen, and ocean-view were only accessible by a large staircase. Although there was one bedroom downstairs, our wheelchair-bound family member had no access to the main amenities or the beautiful view that we rented the home to enjoy. I reread the listing after we arrived to make sure I hadn't missed something, but it did not clearly disclose that the primary living space required climbing a full flight of stairs. Had it been accurately described, we would have booked another property. Adding to the frustration, the next-door neighbor asked us not to use the front door because it created too much noise. Unfortunately, the front door was the only entrance that allowed us to get our family member's wheelchair into the home. The garage entrance had a large board across the threshold that required stepping over, making it inaccessible. The rooms were clean, and the ocean view was beautiful. However, the balcony and exterior were in need of repair. We also requested an early check-in. While we understand it couldn't be accommodated, we had to reach out multiple times before receiving a final determination. It would've been easier to decline. The view was 10/10. The accessibility was 0/10. Most importantly, the listing did not accurately capture accessibility."

Here is a screen shot of the listing which claims wheelchair accessibility



Pacifica has always been an affordable place to buy a home, relative to its neighboring communities in San Mateo and San Francisco counties, acting as one of the least expensive entry points for real estate on the San Francisco Peninsula. Its median home prices sit significantly lower than the broader San Mateo County and San Francisco averages. Pacifica's median home price is ~9.4% than Daly City, and ~4.4% cheaper than South San Francisco.

Yet, the unchecked proliferation of STRs is changing this. Pacifica's homeownership rate has declined steadily since 2019 and now stands at 68.5%, compared to 89.9% in nearby Montara. Pacifica had more STRs than Half Moon Bay, Belmont, Atherton, Woodside, Brisbane, Hillsborough, Colma, and Portola Valley combined. 90% of Pacifica STRs are unhosted whole-home rentals. Nearly two-thirds of these listings are two-bedroom homes or larger—homes well suited for families. Sixty percent are operated by corporate entities with statewide portfolios numbering in the hundreds or thousands of units.

For years, Pacifica residents have endured these impacts while working patiently and through proper processes to update the ordinance. And we did so carefully. This ordinance is not extreme or novel. Its core provisions are drawn from regulations long in place in other California cities, including coastal jurisdictions. It closely mirrors Half Moon Bay's ordinance, which has a primary-residence requirement and a 60-day limit on unhosted rentals. These are well-established regulatory tools the Commission has approved many times.

After years of patient waiting and diligent effort, I urge the California Coastal Commission to approve of Pacifica's STR ordinance as submitted and without modification.

respectfully,

Bryan Reiner

Founder, Pacifica Homes are Not Hotels

President, Pedro Point Community Association

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: Ringuette, Oceane@Coastal
Subject: FW: Public Comment on Agenda Item 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals)
Date: Friday, August 7, 2026 10:15:25 AM

From: Stephanie Robbins <slobbins23@gmail.com>
Sent: Friday, August 7, 2026 9:02 AM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on Agenda Item 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals)

You don't often get email from slobbins23@gmail.com. [Learn why this is important](#)

Dear Chair and Members of the California Coastal Commission,

I am writing to express my deep concern regarding staff's recommendation to gut key provisions of Pacifica's Local Coastal Program amendment (LCP-2-PAC-25-0079-2). As a resident of Pacifica for more than a quarter of a century, I have watched our community navigate the delicate balance between protecting neighborhood cohesion and supporting visitor access. Our City Council spent years working with Pacifica residents to craft an ordinance that balances these priorities, and it is alarming to see Commission staff urge you to strike down two of its most critical safeguards: the primary residency requirement and the 60-night cap on unhosted short-term rentals (STRs).

First, the sudden shift in staff's position is deeply troubling. As recently as January 15, Commission staff reviewed Pacifica's ordinance, including the primary residency requirement and 60-night unhosted cap, and recognized that the city's balanced framework preserved a viable STR market while protecting local housing stock and supporting our neighborhoods.

Reversing this stance now undermines the good-faith efforts of our local government and creates an unjustifiable double standard. This is especially baffling given that our neighbor city, Half Moon Bay operates under a CCC certified ordinance with these exact same mechanisms. If these provisions were deemed consistent with the Coastal Act for Half Moon Bay, why is staff now suggesting they are unacceptable for Pacifica?

Second, staff's assertion that stripping unhosted STR limits is necessary to protect "affordable coastal access" relies on a premise that does not match local market reality. When comparing accommodations on a direct, room-for-room basis for visiting families,

unhosted whole-home STRs are consistently more expensive than traditional lodging:

- **Single-Room Entry Point:** A family or couple looking for a simple coastal getaway can secure a traditional hotel room in Pacifica for \$150 to \$220 per night. Conversely, the entry-level cost for even a modest 1- to 2-bedroom unhosted STR starts at \$220 to \$280 per night before fees.
- **Family Stays (2-Room Comparison):** For a family needing two bedrooms, booking two traditional hotel rooms averages \$300 to \$440 per night total. Whereas, once mandatory cleaning fees (\$150–\$250) and platform service fees are added to a 2-bedroom unhosted STR, its effective nightly cost jumps to \$365 to \$455+ per night for a typical weekend stay, making the whole-home STR the most expensive lodging option.

Stripping safeguards on unhosted STRs does not create lower-cost visitor access; it protects an inflated, high-fee lodging tier while incentivizing investors to remove homes from our long-term housing supply (an inventory that is already in short supply).

Unhosted STRs take away residences that should house local families, whereas hosted STRs preserve real housing for residents while providing authentic, budget-friendly home-sharing.

Furthermore, Pacifica already supports broad coastal access. Our city provides free public beach parking in Sharp Park and Rockaway Beach, alongside unmetered street parking throughout our coastal neighborhoods. Visitors do not face costly parking barriers when visiting Pacifica; stripping neighborhood protections from our housing stock is entirely unnecessary to facilitate coastal visits.

I urge the Commission to reject staff's suggested modifications and approve Pacifica's STR ordinance as submitted by our City Council. Please respect our local community's efforts to protect residential housing and long-term residents while maintaining meaningful, affordable coastal access.

Sincerely,
Stephanie Robbins
Pacifica Resident

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: [Watson, Mandy@Coastal](mailto:Watson.Mandy@Coastal)
Cc: [Ringuette, Oceane@Coastal](mailto:Ringuette.Oceane@Coastal)
Subject: FW: Pacifica Air BnB Considerations
Date: Monday, August 3, 2026 1:57:05 PM

From: Lara Rondberg <lrondberg@gmail.com>
Sent: Monday, August 3, 2026 1:56 PM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Pacifica Air BnB Considerations

You don't often get email from lrondberg@gmail.com. [Learn why this is important](#)

Hello,

I am respectfully submitting my comments to the CA Coastal Commission regarding the Short Term Rental guidelines in Pacifica under discussion.

I am a single professional woman working in the non profit education sector. I have lived in Pacifica for 10 years and for 5 of those years, I rented a room in a single family home on Beach Blvd which in 2022 was sold to Marbella Lane Corporation's co-CEOs, who flipped it immediately into an unhosted STR. That property has now become a known public nuisance STR.

With the sale of that house and being forced to leave, I experienced much difficulty finding affordable rental housing. I lived in said home for 5 years with rent control extended by the owner of the home. When I was forced to leave I found it nearly impossible to find affordable housing in the community. There was very little available, whether that be in larger corporate apartment complexes, smaller rental units or rooms in private homes.

I am an ardent supporter of local businesses and initiatives and dearly wanted to stay in Pacifica. When I look at AirBnB/VRBO websites for rentals in Pacifica I am saddened to see so many of the houses near where I used to live on Beach Blvd offered as "hotels" instead of housing for community members. Houses that used to contain families now are hotels leaving those of us who want to rent in Pacifica very few affordable options. I know this is not unique to Beach Blvd and the problem extends throughout Pacifica.

A city like Pacifica is made up of neighbors and neighborhoods. It is what makes it a welcoming place to live for people like me who are not from here but desire to live in a community where neighbors help each other and help support the community. This can

not happen if many people like me, hard working professionals who desire a safe place to live, can not find suitable housing options to remain in Pacifica.

I hope the Coastal Commission considers upholding the measures put forward by the Pacifica City Council to protect housing housing options for people who want to live in Pacifica and support the community.

Respectfully,
Lara Rondberg

From: [Travis, Galen@Coastal](mailto:Travis_Galen@Coastal)
To: [Ringuette, Oceane@Coastal](mailto:Ringuette_Oceane@Coastal)
Subject: FW: Comment: City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals)
Date: Friday, August 7, 2026 1:05:20 PM

From: Adrienne Schaal <adrienneschaal@gmail.com>
Sent: Friday, August 7, 2026 11:28 AM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Comment: City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals)

You don't often get email from adrienneschaal@gmail.com. [Learn why this is important](#)

Dear Commission Members,

I reside at 268 Olympian Way in Pacifica and urge you to approve Pacifica's STR ordinance without any amendments. The ordinance should be able to be applied consistently across the city.

Olympian Way is a narrow lane (1-car width) in Pedro Point and the proliferation of short term rentals causes many issues due to increased parking and traffic.

Thank you for your consideration.

Sincerely,
Adrienne Schaal

From: [Dave Schorr](#)
To: NorthCentralCoast@Coastal
Subject: COMMENT: City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Thursday, August 6, 2026 8:41:54 AM

You don't often get email from davetreas@gmail.com. [Learn why this is important](#)

I urge the Commissioners to approve the Pacifica STR ordinance as previously drafted, which previously had support of Staff.

As you are no doubt aware, your proposed loosening of regulations is widely opposed by residents of the city of Pacifica.

The tortured arguments of Staff to amend the LCP to remove the cap on number of nights of stay, and owner occupancy are harmful to the City and residents of Pacifica.

STR regulations are notoriously hard to enforce, and it is a very slippery slope. Property owners, and especially owners of multiple properties used for short-term rental will find creative ways to work around less stringent restrictions.

STR was meant as a way for homeowners to develop some reasonable amount of additional income, from extra rooms in their homes, or the entire home on occasion. It has morphed into an industry controlled by very large corporations, which have strong motivation for monetary gain. In that situation, there is considerable risk to the City and residents.

The changes proposed are likely to run afoul of LUP Policy PR-G-26, which require adequate offstreet parking. That will be nearly impossible to enforce.

Staff report fails to acknowledge an important clause of Coastal Act section 30210, where that section requires protection of private property rights. That is the core issue here, as loosening the short term rental regulations impinges upon the private property rights of others in the neighborhoods where the rentals occur. The restrictions originally proposed were put in place to protect private property rights.

Loosening short-term rental regulations is also very likely to reduce available rental stock for long-term renters, a critical need in the coastal area. Staff dispenses this concern, but as we have seen in many vacation resort communities, it becomes a real problem – when houses are left vacant for much of the year, and rented only on weekends or during holiday periods, they are unavailable for long-term rentals for people who live and work in the area. This is a simple fact, and cannot be waved away by contentions of Staff.

STR regulations in neighboring communities are consistent in requiring owner occupancy, and limiting the number of days of short term stay.

One has to wonder if the about-face by Staff on this issue is driven by pressure from higher up the food chain at CCC, and ultimately, by pressure from the short-term rental industry players. That is not right. CCC serves the public, the public include homeowners of the communities in which CCC has jurisdiction.

In recent issues brought before CCC of which I am aware, I'm seeing an alarming trend of CCC leaning towards increasing overnight accommodations, rather than preserving the

coastal resources which people come to enjoy. The balance having shifted towards development, the coastal resources themselves are at risk.

Please approve the previously drafted and supported short-term rental regulations for the City of Pacifica, and reject this proposed loosening of regulations.

Sincerely,

David Schorr
Half Moon Bay, California

From: [C.K. Scott](#)
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Friday, August 7, 2026 10:10:54 PM

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To whom it may concern:

I am a Pacifica resident. I have owned my home 1 block from the pier for 10 years. I love my neighborhood. I love the people that I have met during daily walks along beach boulevard. I love my conversations with neighbors while dogs are playing or we're checking up on one another's health and actions we can take to support one another.

Over the past decade it has been sad to watch one house after another fall into the hands that aren't part of this community. Houses sit dark and empty. Nightly dog walks are a little scarier. The neighborhood is a bit thinner. Where did the regulars go? Short term rentals with no owner oversight have produced a neighborhood of empty and dark houses (not a caring community that is filled with kids in school and neighbors that help one another).

It is frequently broadcast that California has a housing crisis. Is this true? If so, why are we selling our single family homes to companies that have no interest in investing in Pacifica?

No kids to enroll in our schools? No regulars purchasing food from grocery stores and local restaurants?

I'll admit that I was swayed by the personal financial offset of running an Airbnb through a second home purchase in amador county in 2021. We filed paperwork with the county and obtained appropriate permits to use our second home as an Airbnb. We were cautious in choosing our renters. This was a home that our family used to safely have a getaway during Covid and the years following. We carefully inspected requests for stays. We had 5 stays that went well- a baby moon couple, a family celebrating a 90th birthday...all respectful groups that didn't disturb the neighborhood of properties each set on 5 acres. And then there was our 6th guest. He was rated 5 stars by Airbnb and had stated that he was bringing together family for a reunion. Our Ring camera (set on the large driveway) quickly revealed a different type of guest upon check in. We uncomfortably watched car after car arrive into the driveway. Things were quiet for a bit and then a huge disturbance on our Ring revealed a fight among women. Scary fight. We called Airbnb for support and we were told that the renters had "tenant rights". Even though we had witnesses and had caught on camera a brutal fist fight outdoors where cameras were located, there was nothing we could do to protect our property or our neighbors. Airbnb did nothing to help. They basically told us we had no rights despite the altercation and physical assault.

In the end the woman who was punched and had a tooth knocked out called the police early the next morning. Thank goodness! We worked with police to give them the Ring evidence of assault.

Our takeaway- Airbnb/ short term rentals are a total disturbance to neighborhoods. We stopped renting.

I live with the knowledge on both sides-

1. short term rentals create an empty and dark neighborhood filled with empty soulless houses
2. as an individual owner (not these mass companies purchasing our California residents), short term rental companies provide zero protection for your personal property or your community

I scream NO to short term rentals that are not physically part of an on property owner.

Keep Pacifica homes for families and friends that want to be part of our Pacifica community.

I appreciate your attention to this issue,
Chelsea Perramond
125 Santa Rosa Ave
Pacifica, Ca 94044

[Sent from Yahoo Mail for iPhone](#)

From: [Brittaney Shade](#)
To: [NorthCentralCoast@Coastal](#)
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Wednesday, August 5, 2026 9:24:00 AM

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Hello,

I would like to strongly discourage amending 13b. Who does this benefit? Not young families trying to buy housing and remain in Pacifica. The public spent a lot of time on the initial proposal, why change it? This will continue to force out families who care about the city and coastside.

Thank you,

Brittaney Shade

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: Ringuette, Oceane@Coastal
Subject: FW: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Friday, August 7, 2026 1:10:55 PM

-----Original Message-----

From: Karen Shinto <karensinto@icloud.com>
Sent: Friday, August 7, 2026 12:27 PM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Cc: Karen Shinto <karensinto@hotmail.com>
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).

[You don't often get email from karensinto@icloud.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear California Coastal Commission,

I'd like to see the west side of hwy one, coastal side of STR have the same allowances and restrictions as what is in place on my side, east of hwy one.

I live in Sharp Park east in a neighborhood with a very responsible STR owner who follows the rules regarding respect for the neighborhood. The owner/family lives on the premises and can monitor noise, parking and curfew hours with guests. We have never had any issues with a STR given these allowances/restrictions in our neighborhood.

I also own a home in the Joshua Tree/Yucca Valley area where the STR situation has invited pushing out of locals who cannot afford rental housing due to loss of home due to flipping houses to STR, who's rental prices are unaffordable for anyone who works and lives local in retail, restaurant, house cleaning, service industries, on minimum wage, or on fixed income.

While I realize that tourist and visitors are welcome to enjoy and bring revenue to the area, if it comes at a cost to those who live within the area with unregulated rules and law, it is not a feasible solution.

Kind regards,

Karen Shinto
East Sharp Park, Pacifica.

From: [Gail Benton Shoemaker](#)
To: [NorthCentralCoast@Coastal](#); [Honey, Julian@Coastal](#); [Ringuette, Oceane@Coastal](#)
Subject: Public Comment: Agenda Item 13.b (Aug. 12): Support for Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short-Term Rentals)
Date: Friday, August 7, 2026 3:21:40 PM

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Dear Chair Harmon and California Coastal Commission Members,

There is a housing crisis in the Bay Area. Pacifica families are struggling to find homes, in part because of short-term rentals. Please adopt the short-term rental ordinance with the conditions approved by the Pacifica City Council. I am a Pacifica resident of 37 years. I have attended City Council meetings where out-of-town homeowners in Pacifica said they would not rent to local families because they make more money with short-term rentals. They clearly do not care about the well-being of our community.

Pacifica's coastal neighborhoods continue to experience the negative effects of short-term rentals, including massive parties with excessive noise and garbage. There is very little concern for the coastal environment.

Do not bow to the corporate interests of Airbnb. Support our local coastal community by approving a unified short-term rental ordinance throughout Pacifica.

Thank you, Gail Shoemaker

SUBJECT: August 12, 2026 California Coastal Commission Meeting, ITEM NO: W13.b, City of Pacifica LCP Amendment Number LCP-2-PAC-25-0079-2 (City of Pacifica Short-Term Rentals)

August 5, 2026

Dear Commissioners,

I am writing to you as a resident since 2018 of the Pedro Point portion of Pacifica, who is concerned with the number of unhosted short-term rentals (STRs) that are operating in our City west of Highway 1 and the lack of sensible restrictions placed upon them. Unhosted STR's are destroying the fabric of our community.

My husband and I live in a home where the two properties nearest to us are owned by out of town investors. There used to be a constant stream of strangers around our home. It didn't feel like a neighborhood. But, one of the properties (which has two dwellings on it) which was formerly two unhosted STR has become full-time, long-term rentals and the new neighbors are lovely additions to our community. The out-of-town owner made this change in anticipation of the change in the ordinance for the communities west of Highway 1.

As you know, the new ordinance that has been adopted for Pacifica (east of Highway 1) is now, among other things, prohibiting full-time unhosted STRs, requiring one off street parking spot per rental bedroom, limiting unhosted renting to 60 nights per year, requiring that the rental space have a safety inspection, limiting the number of guests per bedroom, etc.

I was shocked and disappointed to learn that the Commission Staff have recommended the removal of the primary residence requirement and the 60-night max on unhosted STR rental nights from Pacifica's STR ordinance. How can this be? **I strongly oppose the Commission Staff's recommendation to remove the primary residence requirement and the 60-night max on unhosted STR rental nights from Pacifica's STR Ordinance.**

Pacifica's new STR ordinance for all of Pacifica east of Highway 1 went into effect in October, 2025. The process to get to this new ordinance has been a very long one...over eight years...with impressive public participation along the way (STRs have been discussed at 14 City Council meetings and have been the subject of four dedicated study sessions as well as three public meetings on the issue of STRs in Pacifica). Through this process, the Pacifica City Council has created a balanced approach welcoming visitors through a variety of accommodations, while maintaining the residential character of our coastal neighborhoods. The Ordinance reflects a respect for community character, versus the commercialization and commodification of our residential assets.

I am familiar with the historic support of the Commissioners of the CCC's for the community process. So, why has the Commission Staff recommended the removal of the primary residence requirement and the 60-night max on unhosted STR rental nights from Pacifica's STR ordinance? It is clear that the Commission staff recognizes all of the process that has taken place since this is acknowledged on page 16 of its January 15, 2026 report: *"Indeed, the City has spent nearly eight years seeking a balance for STR regulations...It is clear that through this process the City has taken the varied feedback to heart and explored a myriad of options and permutations for appropriately balancing important visitor-serving accommodations that increase public access to the coast, while providing for some new opportunities for longer term housing and some new ways of continuing to protect the character of the City's coastal neighborhoods...The City has landed on a compromise that represents a balance...The Commission here agrees with the City's proposal in that regard and finds that the proposed LCP amendment conforms with and is adequate to carry out the SCP LUP as submitted."*

So, I am dismayed and disgusted that the CCC has taken this 180-degree turn only six months later with this new recommendation of removing from our City's STR ordinance the primary residence requirement and the 60-night cap on unhosted rentals. These are the two most critical elements necessary to protect our scare housing stock from corporations and outside real estate investors who seek to commoditize our residential neighborhoods.

It is concerning that many unhosted STRs in Pacifica have illegally converted spaces that are unsafe (garages converted into illegal bedrooms) and lack the ADA accommodations and safety oversight that Pacifica's hotels provide. Plus, these unhosted STRs are known to have too many people crammed into small homes by unhosted STR operators. This puts a strain on Pacifica's environment and infrastructure.

I do support HOSTED STRs (where an actual Pacifica resident "homeshares" a bedroom or other part of their home while they are present), as this is the ONLY form of STR that provides low-cost visitor accommodations without robbing families of housing or raising rents/home prices, and protects neighborhoods from commercialization.

In the Commission's about-face report, dated July 30, 2026, the staff has omitted the fact that the removal of any unhosted STRs can easily be made up with HOSTED ones. Why has the CCC staff not entertain that possibility? Plus the CCC staff has completely discounted the benefits of hosted STRs (the only type of STR that provides truly low-cost accommodations) for the very same economically challenged visitors they seek to accommodate.

The ordinance provides all 'hosted' STR operators with the ability to rent out their homes as unhosted rentals for 60 nights per year. Unhosted STRs are NOT low-cost visitor accommodations!

The CCC staff seems to believe that an approval of our ordinance “as is” will result in a lack of STR accommodations. However, even with the City’s 150-STR cap, primary residence, and a limit of 60-nights per year for unhosted rentals, Pacifica would still have 54,750 STR nights available per year in HOSTED rentals with 9,000 of those nights available as UNHOSTED rentals. This is a very balanced and robust amount!

The CCC staff is recommending Pacifica be denied a permanent residence requirement and a cap on the number of unhosted nights in its STR ordinance when the Commission has given this to Half Moon Bay and to Del Mar just a few months ago. This is blatantly unfair! Without the primary residence requirement and cap on unhosted rental nights, a big, luxury vacation rental corporation can simply buy up many Pacifica homes and assign one of their many employees the role of “natureal person’ STR operator.”

I strongly oppose the Commission Staff’s recommendation to remove the primary residence requirement and the 60-night max on unhosted STR rental nights.

Please do the right thing for coastal Pacifica and vote to pass the STR ordinance as it stands for the rest of Pacifica east of highway 1. Protect Pacifica’s coast and its coastal neighborhoods from over-commercialization and keep our neighborhoods and beaches safe and accessible to all.

Pacifica’s residents and its neighborhoods are counting on you.

Thank you,

A handwritten signature in dark ink, appearing to read "Rebecca Smith-Coggins". The signature is fluid and cursive, with the first name being the most prominent.

Rebecca Smith-Coggins, MD

From: [Wendy Snyder](#)
To: NorthCentralCoast@Coastal
Subject: Short-Term Rental Ordinance.
Date: Tuesday, August 4, 2026 4:11:38 PM

You don't often get email from wendysnyder61@gmail.com. [Learn why this is important](#)

Dear Commissioners,

I am a Pacifica resident. Very soon you will be voting on a proposed short-term rental ordinance. I would like to give you my view on this matter and hope you consider these issues.

I am fortunate to live very close to the Pacifica Pier. I frequently walk along the promenade and take in the beautiful ocean views and surrounding neighborhood. I notice that many of the rentals on Beach Street remain empty, day to day. When they are rented, much activity goes on including lots of noise. I have heard from long term residents that the noise, garbage, and parking issues make the serenity of the area a challenge for those long term residents/renters. I have also heard that in other cities, similar issues regarding short term rentals have come up and were resolved by adopting an ordinance that requires the property owners to live in or near the rental property or require rentals to have an onsite property manager. This would make property owners more accountable when things go wrong and give the neighborhood community an opportunity to voice concerns as they arise.

Please consider the proposed short-term rental ordinance as a way to ensure accountability and neighborhood serenity.

Thank You,

Wendy Snyder

From: [Blue and Julie](#)
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Thursday, August 6, 2026 4:22:01 PM

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To: Coastal Commission members

I have lived in Pacifica for 15 years. I live on the east side of Hwy. 1 so I haven't experienced firsthand the horrors of unhosted short term rentals (STRs) that people on the west side have, but I have friends who tell me of the noise, the trash and the general disruption of their neighborhoods.

It is appalling (and surprising) to me that the Commission staff recommended removing the primary residence requirement and the 60 night maximum on unhosted STR rentals. The Pacifica City Council had carefully considered all sides when they passed their STR Ordinance. They found a balance that worked to accommodate visitors and still keep our residential community protected. They looked at Ordinances from other Coastal cities and used what they found. Half Moon Bay City Council has passed a similar Ordinance and the Coastal Commission has already signed off on that one. I do not understand why Commission staff did not look at that.

The proposed Pacifica STR Ordinance does not ban STRs, it supports real 'home sharing' by not limiting the number of nights of a hosted rental. As a resident of Pacifica, I worry about people being priced out of living or visiting here. I worry about commercialization of our community. And if you look at the numbers, hosted rentals actually cost less for a visitor than unhosted rentals.

I have always supported the decisions of the Coastal Commission and felt that the Coastal Commission has been dedicated to making the coast of California a better place, a more open place for all people to visit, to use and to enjoy. I so strongly urge the Commission to ignore the staff recommendation and approve Pacifica's Ordinance as written: keep the primary residence requirement and keep the 60 day maximum on unhosted STRs.

Thank you, Julie Starobin

From: [mark.stechbart](#)
To: [NorthCentralCoast@Coastal](#); [Honey, Julian@Coastal](#); [Rexing, Stephanie@Coastal](#); [Huckelbridge, Kate@Coastal](#)
Cc: [czma.california-evaluation@noaa.gov](#)
Subject: pacifica short term rental aug 12 CCC hearing & NOAA Aug 10
Date: Wednesday, August 5, 2026 8:41:22 PM
Importance: High

[City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 \(Short Term Rentals\).City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 \(Short Term Rentals\). August 12, 2026 Item 13B](#)

Oppose August 2026 CCC staff report.

Adopt the Pacifica ordinance as submitted. Retain the primary residency requirement and 60-night unhosted cap from LCP Amendment LCP-2-PAC-25-0079-2.

Council deliberated for months to fashion the ordinance now before the CCC. Hundreds of residents testified against STRs.

City Council made an informed public policy decision that STRs needed to be tightly regulated to preserve our neighborhoods, to preserve the quiet enjoyment of our neighborhoods.

This city council focus on enhanced STR regulation is mirrored through-out the state, the nation and even overseas. STRs are viewed with concern and in many cases are banned outright in entire countries.

Has any coastal city come before the CCC and asked for more STRs under reduced regulation?

CCC staff is going in the wrong direction with the current reversal and is on the wrong side of history.

CCC can exercise a high level of discretion and support actions within the wide range of what can be considered reasonable to meet Coastal Act and LCP objectives

The CCC should reflect on the Half Moon Bay (60 days, primary residence) and Del Mar (primary residence) experience.

Take note that the original Pacifica amendment before the CCC in 2024 had commissioners saying they would support an ordinance with bite and teeth. The Jan 2026 staff report for the Feb meeting supported Pacifica's amendment.

The low income environmental justice coastal access gambit via STR is questionable. Coastal STRs are bloody expensive. Even the cleaning fee is exorbitant.

The Pacifica coastal zone containing residences is 400 yards wide... 5 distinct small neighborhoods with tight or no street parking. Close- in homes where sound carries. The coastal zone is tiny-- 0.27 square miles and the rest of town east is 12.40 sq miles. So the east side with proper STR regulations carries alleged low income access...not the coastal zone. And over the hill, within 7-12 driving miles, are **9,400 hotel rooms**.

And we have hundreds of county and state camp sites south county that take tents and RVs.

If CCC staff believed STRs help low income, CCC staff would put rental rate caps on STRs like they do coastal hotels..

Adopt the Pacifica ordinance as submitted.

-30-

author: 8-5-26

mark stechbart
mstechbart@msn.com
650.274.5193

From: [Margaret Stringer](#)
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Wednesday, August 5, 2026 10:50:33 AM

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I am a 43 year resident of the Sharp Park neighborhood in Pacifica. I am against the proposed changes to the STR ordinance as proposed by the Coastal Commission. The negative impacts of STRs in our small beach community is huge. Most are completely unregulated and operated by absentee landlords who have no connection to the community and feel no obligation to improve the community. Bad and intrusive behavior by those renting these units are well documented and owner indifference to these issues is also well documented. When a home goes up for sale, neighbors fear an outside investor will purchase the property and turn it into a STR. Living next to a property that has a revolving door of renters and visitors, as well as the extra vehicles is a negative impact on the neighborhood, community and environment. These neighborhoods are zoned residential, not commercial, and de facto hotels/motels should not be allowed. Please keep the proposed ordinance as written and don't let the Coast be up for sale. Half Moon Bay has a similar ordinance and that was allowed. Please do the same for Pacifica.

Thank you
Margaret Stringer
Pacifica, CA
Sent from my iPad

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: [Ringuette, Oceane@Coastal](mailto:Ringuette,Oceane@Coastal)
Subject: FW: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Friday, August 7, 2026 9:46:46 AM

From: George Surmaitis <surmaitisgeorge@gmail.com>
Sent: Thursday, August 6, 2026 6:24 PM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).

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As a Pacifica resident this is to urge the Commission to keep in place the resident requirement and limit on the number of days for SRT each year. I have lived close to a SRT which was a source of endless cars turning in the street, into the night, resident parking taken up, noise and disruption. Since that SRT was sold a young family was able to achieve their dream of owning a home. The more SRT's the fewer homes, in the midst of a housing shortage, and prices are further driven higher due to the reduction in inventory. This issue is not about rejecting inclusion or opportunity for others to enjoy Pacifica. Pacifica is a welcoming place. If corporations or persons who have no real connection to our city operate SRT's it can diminish the warmth and sense of community. If persons who reside in Pacifica at least a substantial amount of time operate SRT's this can foster a positive balance. Thank you for your consideration.

George Surmaitis

From: [Remi Tan](#)
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Wednesday, August 5, 2026 8:18:04 AM

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Dear honorable coastal commission,

I urge the coastal commission to not eliminate the provision that requires a short term rental owner to live in Pacifica at least six months of the year. The intention of this provision is to prevent outside speculators from buying up existing housing that is already in short supply to run short term rental businesses, but still allowing local Pacifica to have a income stream from short-term rental rentals that would make their homes more affordable

I also urge the commission not to delete the requirement of the 60 day annual cap. The intention of this measure is to discourage outside investors from buying up housing in short supply and converting them into short-term rentals. In the meantime, local residents that have a spare room to rent can still rent those short term to help supplement their income and afford housing.

Thank you and Best Regards,

Remi Tan, AIA LEED AP BD+C

Architecture, Green Building
Real estate investment and brokerage

650 291 3097
Pacifica resident

Sent from my iPhone

From: [Steve Taubman](#)
To: [NorthCentralCoast@Coastal](#)
Cc: [Deanna Taubman](#)
Subject: Public Comment: LCP Amendment LCP-2-PAC-25-0079-2 (Short-Term Rentals) - California Coast Commission Hearing on August 12, 2026
Date: Wednesday, August 5, 2026 2:07:10 PM

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Public Comment: LCP Amendment LCP-2-PAC-25-0079-2 (Short-Term Rentals)
California Coastal Commission — August 12, 2026 Hearing

From: Steven and Deanna Taubman
Address: 460 Talbot Avenue, Pacifica, CA 94044
Email: taubman@gmail.com **Phone:** 650-922-2327

Dear Commissioners,

We are writing as permanent residents of Sharp Park, Pacifica, where we have lived for 16 years at 460 Talbot Avenue (and we have lived in Pacifica for over 20 years). We are submitting this comment in strong opposition to the staff recommendation to strip the primary residency requirement and 60-night unhosted cap from LCP Amendment LCP-2-PAC-25-0079-2. We urge the Commission to certify the City of Pacifica's amendment as submitted.

We are the community this amendment is designed to protect — and our perspective is largely absent from the record before you.

We have reviewed the correspondence submitted to the Commission, which runs to 359 pages and is dominated by letters from short-term rental operators and their industry advocacy group, Pacifica for Responsible Tourism. We ask the Commission to consider how unrepresentative that record is of the actual experience of permanent residents who live alongside these properties every day. We are here to provide that perspective.

The Human Cost: What an Unhosted STR Does to a Neighborhood

Our block in East Sharp Park has been transformed by unhosted short-term rentals. Where we once had neighbors, we now have a revolving door of strangers. We no longer have a sense of community on our street. We do not know who our neighbors are, because our neighbors change every few days.

This is not an abstraction. We live directly adjacent to 430 Fullerton Avenue, an unhosted STR operated by Alan Hyland, who resides in San Francisco. This property has operated as a whole-house rental for groups of up to ten guests. Based on Airbnb review data and independently verified occupancy data, we estimate that this property has been rented for 85 to 135 nights in 2026 alone — well more than double Pacifica's current 60-night annual cap for unhosted rentals, which the operator appears to have disregarded entirely. The listing markets itself explicitly as a "private retreat" for "out-of-market guests," with entirely remote check-in and no host presence. Evidently a "retreat" includes a place for dozens of people to yell and sing loudly and be intoxicated at all hours. Our children are grown, but were we to have any young people in our house we would have considered moving long ago for safety reasons.

Garbage from these parties regularly winds up blowing around the neighborhood and onto our property. Repeated contact directly with the representative of the owner has resulted in no change. Our neighborhood is no longer a place where it is appropriate to raise a family. We are currently engaged with the City of Pacifica's Code Enforcement division, which has confirmed this is an active enforcement case.

According to AirROI's 2026 Pacifica market dataset (airroi.com/airbnb-data/united-states/california/pacifica, updated August 1, 2026), 430 Fullerton Avenue is the single highest-revenue STR listing in all of Pacifica, generating an estimated **\$272,964 in annual revenue** at an average nightly rate of \$1,238. This is not a homeowner supplementing their income. This is a commercial hospitality operation generating over a quarter of a million dollars per year from a residential property in our neighborhood, operated by an absentee owner who lives 18 miles away in San Francisco.

This is the reality that the ordinance the Commission is now being asked to gut was designed to address. Operators who are not present, whose primary residence is elsewhere, who rent their properties as commercial hospitality businesses — not as occasional home-sharing — are the norm in unhosted STR operations, not the exception. The same AirROI data shows that the average Pacifica STR generates \$58,808 in annual revenue, with 92.5% of listings classified as "Entire Home" — whole-house commercial operations, not shared residences.

These numbers do not take into account the non-monetary impact with regard to the misery of living adjacent to an unhosted STR.

The Staff Recommendation Is Based on a Flawed Framing

The staff report frames the primary residency requirement and 60-night cap as threats to public coastal access and environmental justice. We respectfully but firmly disagree with this framing on several grounds.

First, the environmental justice analysis runs entirely in one direction. The staff report expresses concern for inland visitors who may not be able to access coastal accommodations if STRs are reduced. This is a legitimate concern. But the staff report fails to ask an equally important environmental justice question: what about the long-term residents of Pacifica — many of whom are working-class families who have lived here for generations — whose neighborhoods are being hollowed out by absentee investors converting homes into commercial lodging operations? As a result of these corporations and wealthy investors purchasing properties for short-term rentals, paying all-cash for properties, regular working class people have been priced out of our market. Local elementary schools are struggling and closing because young families can no longer afford to live here. The long-term rental market has been absolutely gutted by the short-term rental market. The loss of community, the erosion of neighborhood cohesion, and the transformation of residential streets into hospitality districts are also environmental justice issues. They are simply less visible to a Commission evaluating land use policy from a distance.

Second, the staff report's own data undercuts its conclusion. The report notes that since the ordinance was implemented outside the coastal zone, STRs dropped from approximately 145 to 75 — a roughly 50% reduction. The staff report characterizes this as evidence of harm. We would characterize it as evidence that the ordinance is working exactly as intended, giving residential neighborhoods back to permanent residents.

Third, the Commission's own standard of review requires LUP consistency, and the LUP is clear that community character is a value to be protected. LUP Policy 30253(e) explicitly calls for protecting "special communities and neighborhoods which, because of their unique characteristics, are popular visitor destination points." Pacifica is comprised of many such neighborhoods. Its unique character — the very thing that makes it appealing to visitors — is being eroded by the proliferation of unhosted STRs that treat Pacifica's neighborhoods as hospitality zones rather than residential communities.

Airbnb's Presence in This Process

We note that Airbnb is explicitly listed among the parties with whom Commission staff had direct contact during preparation of this staff report. Airbnb is a multi-billion dollar corporation with a direct financial stake in the outcome. Its interests are not aligned with those of permanent residents.

We are just regular citizens. We do not have the \$19 million that Airbnb spent in 2025 alone lobbying municipal governments and the California Legislature. We do not have the legal teams and policy staff that Airbnb deploys to shape regulatory outcomes in its favor. What we have is firsthand experience of what these policies look like on the ground — and publicly available data. That data tells a clear story: the Pacifica STR market is dominated by commercial operations generating tens of thousands to hundreds of thousands of dollars annually per property. The highest-grossing operator in Pacifica manages 10 properties generating over \$861,000 per year (AirROI, 2026). This is not some grandmother's supplemental income. This is big business with deep pockets, sophisticated legal representation, and every incentive to lobby regulators aggressively. By siding with Airbnb's framing of this issue, the Commission would be siding with large commercial interests against the very people who live in, care for, and sustain the communities that make Pacifica's coastline worth visiting.

The Commission should weigh accordingly the degree to which the staff analysis reflects Airbnb's framing of the public access question.

The Ordinance as Submitted Represents a Reasonable Balance

The City of Pacifica engaged in years of community deliberation before arriving at this ordinance. The provisions the Commission staff recommends removing — the primary residency requirement and the 60-night unhosted cap — are the very provisions that distinguish genuine home-sharing from commercial investment operations. Without them, an absentee property owner in San Francisco can rent a Pacifica home as a full-time hospitality business for 365 days a year, with no connection to the community and no accountability to neighbors. That is not home-sharing. That is a hotel without the oversight.

The 150-unit cap that the Commission certified in 2024 was meant to reflect market equilibrium. The additional provisions in this amendment are meant to ensure that those 150 permits go to actual residents who have a genuine stake in the community — not to absentee investors for whom Pacifica is simply a revenue stream.

Precedent: The Commission Has Approved These Same Provisions Elsewhere

The provisions the staff now recommends removing are not novel, untested, or extreme. The California Coastal Commission has already approved nearly identical requirements in other

San Mateo County and Southern California coastal communities. In March 2023, the Commission approved Half Moon Bay's STR ordinance — located just 8 miles from Pacifica — which includes the identical combination of a primary residency requirement (six months per year) and a 60-night annual cap on unhosted rentals, with no limit on hosted stays. That ordinance has been in effect since 2024 and was certified by the Commission specifically because the 60-night unhosted cap, rather than an outright ban, was seen as an appropriate balance. Further south, the Commission approved Del Mar's STR ordinance in February 2026, which similarly requires that STRs operate only in primary residences where the owner lives at least half the year. The Commission's own staff report on the current Pacifica amendment references these and other precedents (LCP-2-HMB-21-0078-2, LCP-6-DMR-0048-2) as comparable cases. It is therefore inconsistent for the Commission to approve primary residency requirements and 60-night caps in Half Moon Bay and Del Mar while simultaneously recommending their removal in Pacifica, a neighboring community facing the same pressures. Pacifica's proposed ordinance is not an outlier — it is in step with what the Commission has already certified as appropriate coastal STR regulation along the California coast.

Conclusion

We urge the Commission to certify the City of Pacifica's amendment as submitted, including the primary residency requirement and the 60-night unhosted cap. These provisions protect the permanent residents whose community makes Pacifica worth visiting in the first place. Without them, the coastal zone will continue to be hollowed out, one unhosted rental at a time, until there is no community left to protect.

Respectfully submitted,

Steven and Deanna Taubman
460 Talbot Avenue
Pacifica, CA 94044
taubman@gmail.com
650-922-2327

From: [Bruce Thompson](#)
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Wednesday, August 5, 2026 9:47:02 PM

You don't often get email from bruceathompsonjr81@gmail.com. [Learn why this is important](#)

Dear Chair and Commissioners,

I am writing in support of the Coastal Commission staff recommendation to approve the City of Pacifica's proposed short-term rental ordinance with the suggested modifications.

I believe the staff has reached the right balance between protecting neighborhoods and preserving the economic and public access benefits that responsible short-term rentals provide. The recommended approach retains strong regulations addressing noise, parking, occupancy, safety, permit enforcement, and restrictions on commercial operators, while removing only the provisions that would unnecessarily reduce the availability of short-term rentals.

As someone who cares deeply about Pacifica, I believe a healthy and well-regulated short-term rental market is an important driver of local investment. Allowing responsible property owners to continue operating short-term rentals makes investing in Pacifica more attractive, encourages continued maintenance and improvement of homes, and supports property values over the long term. While this is my opinion, I believe reducing the viability of short-term rentals would discourage investment without delivering meaningful housing benefits.

I also believe these properties generate significant economic activity. Visitors staying in Pacifica spend money at our restaurants, coffee shops, grocery stores, retail businesses, and other local establishments while generating Transient Occupancy Tax revenue that helps fund essential City services. Those economic benefits ripple throughout our community and support local jobs.

The staff report also concludes that there is insufficient evidence that the proposed primary residence requirement and 60-night annual limit would meaningfully increase affordable or workforce housing. At the same time, those restrictions would substantially reduce visitor accommodations and limit public access opportunities along the coast.

I appreciate that the Commission's recommendation does not eliminate reasonable regulation. Instead, it preserves the City's ability to enforce strong neighborhood protections while maintaining a balanced approach that supports tourism, local businesses, property investment, and public coastal access.

For these reasons, I respectfully urge the Commission to adopt the staff recommendation and approve the ordinance with the suggested modifications.

Thank you for your consideration.

Bruce Thompson

Sent from my iPhone

From: [Anna Tong](#)
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 12, 2026 Meeting – Item W13b / LCP-2-PAC-25-0079-2 (Pacifica Short-Term Rentals) – OPPOSITION
Date: Sunday, August 9, 2026 9:54:37 PM

You don't often get email from anna.l.tong@gmail.com. [Learn why this is important](#)

August 9, 2026

Dear Chairperson and Honorable Commissioners,

I am a short-term rental operator in Pacifica. In July 2024, a multi-generational family from Central California reached out to book our apartment during a brutal heatwave, the kind that's become all too normal in recent years. They wrote: *"Hello, visiting because it's my daughter's 6th birthday. We live in central California and want to escape our 115 degree heatwave."*

For their family consisting of 4 adults, 2 children and 1 infant, they paid us \$238 for one night.

When they left, they sent us another message: *"Out of the valley heat and had a great time without breaking the bank!! Thank you for making it all possible!"*

Stories like theirs are precisely why I am writing today to urge you to accept the proposed modifications to the LCP. As global warming worsens, escaping to the coast isn't a luxury for working families; it's a necessity. We'd also like to request including a grandfather provision for existing STRs in multi-family units, or allowing STRs in multi-family units located in mixed use or commercially zoned areas. The STR story I mentioned above was a unit in a duplex; those accommodations tend to be much cheaper than renting out single family homes.

The central mandate of the Coastal Act is to preserve lower-cost visitor access for all Californians. In Pacifica, short-term rentals (STRs) are not a luxury option; they are virtually the *only* option. An independent analysis from Ceto Consulting I received from Pacifica for Responsible Tourism, the local host coalition that I am part of, shows that short-term rentals provide 77% of the city's visitor lodging capacity. But more important, over half of Pacifica's STRs meet the state's official "affordable" threshold, with an average per-person cost of just \$63 a night compared to \$191 per person at regional hotels. When multi-generational families travel together like the one I referenced above, booking multiple hotel rooms and eating out every meal is financially impossible. Short-term rentals offer the kitchens and shared space that make coastal access equitable.

It is also important to consider the land-use context of our coastal zone. Many of these properties sit directly along active, visitor-serving commercial thoroughfares designed for

tourism. While I certainly wouldn't want to live next to an irresponsible host, I also wouldn't want a neighbor making unsubstantiated claims about my property. Ultimately, choosing to live in a commercially zoned coastal district comes with the understanding that visitor-serving activity belongs there. Furthermore, while local anti-STR groups claim these rentals destroy neighborhoods, the city's own record shows that out of roughly 150 coastal rentals, there has only ever been a single substantiated "bad apple"—which Airbnb removed within a month. When our local STR host group reached out to the City of Pacifica to propose proactive rules to help identify and weed out bad hosts even faster, we were met with silence.

Thank you for your time and leadership in protecting equitable coastal access. I ask that you uphold the core mandate of the Coastal Act and ensure Pacifica remains welcoming and affordable to all.

Respectfully submitted,

Anna Tong

Pacifica host

(Member, Pacifica for Responsible Tourism)

From: [Alexandros Vardakostas](#)
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 12, 2026 Meeting – Item W13b / LCP-2-PAC-25-0079-2 (Pacifica Short-Term Rentals) – OPPOSITION
Date: Sunday, August 9, 2026 10:40:36 PM

You don't often get email from avardakostas@gmail.com. [Learn why this is important](#)

Dear Chairperson and Honorable Commissioners,

My name is Alex, and my wife and I are short term rental hosts in Pacifica. You will receive some letters about how short term rentals are bad for home-owners in Pacifica, but I wanted to share the other side: how behind every reservation is a real family seeking connection and coastal access. They don't get to share their letters with Pacifica's city council so I wanted to give voice to what they have told us about the beauty of the coast and how our STR allows their family to afford to see it.

Over the years, the messages we receive from our guests tell the true story of who stays in Pacifica:

- *"We are planning this awesome little trip up the coast for my Grandma's bday. She was recently diagnosed with dementia so my parents, kids (2), and I want to make sure we give her the most memories we can."*
- *"Living in Fremont, we don't get there often enough! Looking forward to hearing the waves, doing a little hiking at Mori Point and watching the sunset over the ocean!"*
- *"We live way up in the foothills of the Sierra and never get to see the ocean anymore."*
- *"My husband's family lives in Pacifica and we booked the place so that we could spend time with them... It is not easy to find a place as accommodating of children."*

Short-term rentals provide the multi-room, multi-generational accommodation that families need to experience our coastline together affordably.

To protect this crucial visitor access while maintaining local balance, I urge the Commission to accept the proposed modifications to the LCP, including a grandfather provision for existing STRs in multi-family units, and maintain special use in mixed-use, commercial and

residential zones similar to Half Moon Bay. I also ask you to consider several critical facts regarding the City's claims:

1.
Inconsistent Affordability Arguments: While Pacifica claims restricting STRs protects local housing affordability, the City Council has simultaneously proposed raising property taxes—a policy that directly increases costs for local homeowners and renters through financial pass-throughs far more broadly than STRs ever could.
2.
Vacant Homes vs. STRs: Short-term rentals make up a mere percent of Pacifica's housing stock. Eliminating STRs wouldn't make any change to home or rental prices.
3.
Misleading Claims on Party Houses: The City's testimony that platforms like Airbnb refuse to cooperate on party houses is factually incorrect. When Airbnb and our local host group repeatedly asked the City to identify problem listings, the City provided only a single address. That property was removed from the platform within a month, yet the City provided no further listings despite continued host and platform outreach.

I ask that you support the staff recommendation with modifications, preserve grandfathering for multi-family STRs, maintain STRs in mixed commercial-residential zones, and defend equitable coastal access for all California families.

Respectfully submitted,

Alex

Pacifica Host

(Member, Pacifica for Responsible Tourism)

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: [Ringuette, Oceane@Coastal](mailto:Ringuette,Oceane@Coastal)
Subject: FW: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Friday, August 7, 2026 1:10:36 PM

-----Original Message-----

From: Dinah Verby <dinahv@me.com>
Sent: Friday, August 7, 2026 12:02 PM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).

[You don't often get email from dinahv@me.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear Commissioners:

I am a Pacifica resident. I write in support of Pacifica's STR Ordinance as submitted. Please do NOT follow the current staff recommendation (which is a reversal of their previous recommendation).

Please DO approve the requested amendments which are the result of years of negotiations and deliberations between city officials and the community.

Eliminating the provisions that staff proposes would effectively gut the Ordinance and perpetuate the worst conditions caused by the unhosted STRs.

Furthermore, it would be inconsistent with the Coastal Act policy of promoting affordable long term housing in the coastal zone. It would instead incentivize increased acquisition of homes by nonresident property owners for commercial ventures (operating de facto hotels and motels).

Finally, the Commission recently approved similar STR provisions for Half Moon Bay and other coastal cities. To deny the same rights to Pacifica would be blatantly unfair. The Coastal Commission should not participate in the conversion of Pacifica's much needed housing resources into investment commodities.

Respectfully,
Dinah Verby
Sent from my iPhone

From: [mike vernazza](#)
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Tuesday, August 4, 2026 8:07:03 PM

[You don't often get email from mikevernazza@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

The hard work our city council put in along with the public at large to out short term rental ordinance should not be changed.

The recommended changes would put increased pressure on home prices and rents.

Do not amend our language.

Mike vernazza
650 743 6354

From: [Angela Viviani](#)
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Wednesday, August 5, 2026 11:31:34 AM

[You don't often get email from anjovee@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Hello,

I am a long time resident and homeowner in Pacifica. The CCCs attempt to undo the rules and regulations for short term rentals that our city has put in place is reprehensible. After much public input from the citizens of our city, our governing board put in place rules that work best for the citizens of Pacifica. If CCC makes any change, there will be public outcry. I protest any changes. Please leave it as is.

Sincerely,
Angela Viviani
Pacifica, CA

From: ExecutiveStaff@Coastal
To: Ringuette, Oceane@Coastal
Cc: NorthCentralCoast@Coastal
Subject: FW: Public Comment on August 2026 Agenda Item Wednesday 6a - Executive Director's Report
Date: Thursday, August 6, 2026 12:33:20 PM

From: scott <usethemuse2@gmail.com>
Sent: Wednesday, August 5, 2026 6:25 PM
To: ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>
Subject: Public Comment on August 2026 Agenda Item Wednesday 6a - Executive Director's Report

You don't often get email from usethemuse2@gmail.com. [Learn why this is important](#)

Hello,

My wife and I have lived in Pacifica for 26 years and with the advent of STR's in the area, it is no longer a "neighbor"hood. The house across the street from us is rented to very large groups almost every weekend and some weekdays. It can be very disruptive with multiple vehicles, noise and left over trash.

The owners don't live in our neighborhood. Their ad states the home sleeps 16 people. Is the neighborhood even zoned for something like that?

We don't like these STRs but you need to at least insist the owner is hosting while renters are there, ie no UNHOSTED STRs should be allowed. And certainly a cap on the number of days they can be rented.

Thank you,
Scott & Jewel Walli
Pacifica

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: Ringuette, Oceane@Coastal
Subject: FW: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacificai LCP Amendment No LCP-2-PAC-25-0079-2 (Short Term Rentals)
Date: Friday, August 7, 2026 3:48:55 PM

From: Allison West <akwest365@gmail.com>
Sent: Friday, August 7, 2026 3:46 PM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacificai LCP Amendment No LCP-2-PAC-25-0079-2 (Short Term Rentals)

You don't often get email from akwest365@gmail.com. [Learn why this is important](#)

Dear Chair and Commissioners,

I have been a Pacifica resident since 2003 and have lived in the Pedro Point neighborhood within the coastal zone since 2016. I have read the Commissions' staffs' recommendations to modify the City of Pacifica's Local Coastal Program Amendment (Short Term Rental Ordinance). I am writing to respectfully urge you to reject these poorly reasoned and unsupported recommendations as their impact will harm those who live in coastal zone. Instead, I'm urging you to approve the City of Pacifica's Short Term Rental Ordinance as-is for the following reasons.

1. The Commission Previously Agreed that the City's Proposal Conformed with the LCP LUP

The final ordinance reflects the City incorporated the varied feedback over the course of 8 years. The result is:

- The City successfully landed on a solution that balanced important visitor-serving accommodations that increase public access to the coast,
- Creating solutions for new opportunities for longer term housing, and
- Creative new ways of continuing to protect the character of the City's coastal neighborhoods.

Importantly, the Commission said previously that it agrees with the City's proposal regarding the above points and found that the proposed LCP amendment conforms with and is adequate to carry out the LCP LUP as submitted. This is a good thing for Pacifica.

2. Pacifica Should be Treated the Same As Other Cities Re Permanent Residence Requirement

Pacifica should not be treated differently regarding a permanent residence requirement and a cap on the number of unhosted nights in its STR ordinance. Candidly, it's shocking that staff would so blatantly treat Pacifica differently than other cities when the **Commission gave this to Half Moon Bay and to Del Mar just a few months ago.**

Please remember that **during the hearing on the City's 150 cap, you requested Pacifica write a stronger ordinance** (In fact, then-Commissioner Newsome specifically requested one "with bite and teeth"). The new STR ordinance Pacifica submitted to the CCC in December followed those instructions AND City and Coastal staff worked in collaboration on the Ordinance.

And, with a 150-STR cap, primary residence, and a limit of 60-nights per year for unhosted rentals, Pacifica would still have approximately 54,750 STR nights available per year in HOSTED rentals, with 9,000 of those nights available as UNHOSTED rentals. A significant amount of rentals that cannot be overlooked.

Lastly, if the two key elements of Pacifica's STR ordinance—the primary residence requirement and the 60-night cap on unhosted rentals—are taken away, the staff's recommendations are essentially removing the two most critical safeguards against continued neighborhood commercialization from the City's ordinance. This **would not create more affordable coastal access.** Instead, it would:

- Encourage increased speculative investment by absentee owners, out-of-town investors, and for-profit corporations
- Convert more residential housing for use as year-round, high price vacation rentals
- Turn our neighborhoods into de facto commercial hotel districts

I strongly oppose the commission staff's recommendation to remove the primary residence requirement and 60-night max on unhosted STR rental nights from Pacifica's STR ordinance.

For these reasons, I respectfully request that the Commission reject the proposed modifications eliminating the primary residence requirement and the 60-night limit on unhosted short-term rentals and instead certify the City's ordinance as adopted.

Thank you for your consideration.

Allison West
280 San Pedro Ave
Pacifica

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: Ringuette, Oceane@Coastal
Subject: FW: PUBLIC COMMENT on Agenda Item 13 - LCP-2-PAC-25-0079-2 (Pacifica STRs) – OPPOSITION
Date: Friday, August 7, 2026 10:20:06 AM

From: Yizhi Xiong <xiongyizhi@gmail.com>
Sent: Friday, August 7, 2026 10:06 AM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: PUBLIC COMMENT on Agenda Item 13 - LCP-2-PAC-25-0079-2 (Pacifica STRs) – OPPOSITION

You don't often get email from xiongyizhi@gmail.com. [Learn why this is important](#)

Subject: Public Comment: STR Ordinance Revisions – Focus on Enforcement, Not Over-Regulation

Dear Commissioners,

I am writing to urge the Coastal Commission to send Pacifica's proposed Short-Term Rental (STR) ordinance back to the city for meaningful revisions rather than approving the restrictions as currently drafted.

Our community's current framework already includes robust regulations—such as social host liability, mandatory permit/license requirements, and strict occupancy and parking limits. When hosts abide by these existing rules, complaints do not arise. The primary issue facing Pacifica is not a lack of regulatory restrictions, but rather **inadequate enforcement** against the few non-compliant properties.

Data presented at the June 2024 City Study Meeting underscores this reality:

- **Minimal Overall Impact:** In 2023, **only 0.2% of total police service calls** were related to short-term rentals.
- **Isolated Issues:** The vast majority of those complaints stemmed from just **4 problematic properties** out of 150 total licensed units.
- **High Compliance Rate:** This demonstrates that **97.3% of licensed STR operators**—many of whom manage un-hosted rentals—operate responsibly and comply fully with city regulations.

Imposing severe restrictions, such as cap limits on un-hosted rentals or primary residence mandates, unfairly penalizes the 97.3% of rule-abiding hosts due to the unaddressed actions of four bad actors.

I respectfully ask the Commission to request that the city revise the ordinance to focus on strict enforcement against non-compliant properties, eliminate unnecessary caps on un-hosted rentals, and protect existing operators in good standing who provide vital local economic support and visitor access.

Thank you for your time, consideration, and dedication to balanced coastal access and policy.

Sincerely,

Yizhi Xiong

128 Salada Ave, Pacifica, CA 94044

408-858-7727

From: [Travis, Galen@Coastal](mailto:Travis.Galen@Coastal)
To: Ringuette, Oceane@Coastal
Subject: FW: Public Comment: Protecting Coastal Access & Fair Policy in Pacifica's STR Ordinance
Date: Friday, August 7, 2026 9:47:13 AM

From: Andy Yang <qayang@gmail.com>
Sent: Thursday, August 6, 2026 7:41 PM
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>
Subject: Public Comment: Protecting Coastal Access & Fair Policy in Pacifica's STR Ordinance

You don't often get email from qayang@gmail.com. [Learn why this is important](#)

Dear Members of the California Coastal Commission,

I am a Pacifica homeowner and licensed short-term rental (STR) operator writing to respectfully ask the Commission to return the City of Pacifica's proposed STR ordinance for further refinement.

While I appreciate the City's efforts to balance housing and neighborhood needs, the proposed restrictions go further than necessary to address local concerns. I ask that you consider the following points:

- **Targeted Enforcement:** Existing laws already govern noise, parking, and public safety. Enforcement should focus on the few problem operators rather than restricting all hosts.
- **Coastal Access:** Short-term rentals offer flexible, family-friendly accommodations, directly supporting the Coastal Act's mandate to maintain public access to the shoreline.
- **Economic Support:** STR guests support Pacifica's small businesses and contribute significant Transient Occupancy Tax revenue to the City.
- **Proportional Policy:** Heavy restrictions like a 60-day cap or primary residence requirement risk harming coastal access and local hosts without clear evidence of proportional benefits.

To achieve a balanced policy, I respectfully request that the Commission recommend the following adjustments:

1. **Remove or adjust the 60-day cap** on unhosted rentals.
2. **Remove the primary residence requirement.**
3. **Include a grandfathering provision** for existing operators in good standing.

Public policy works best when it addresses proven issues with the least restrictive means possible. Thank you for your time and consideration.

Respectfully,

Andrew Yang
Pacifica Homeowner & STR Operator

Albert Zhang
Pacifica, CA

August 6th, 2026

California Coastal Commission
455 Market Street, Suite 300
San Francisco, CA 94105

Re: Agenda Item — City of Pacifica Local Coastal Program Amendment LCP-2-PAC-25-0079-2 (Short-Term Rental Ordinance); August 12, 2026 Meeting – Opposition

Dear Chair and Commissioners,

I am writing as a Pacifica resident and stakeholder ahead of your August 12 hearing on the City of Pacifica's proposed short-term rental (STR) ordinance. I ask the Commission to reject the ordinance as submitted, or at minimum to require substantial revisions, for three reasons: the process that produced it was compromised, its fiscal impact on the city is severe and unaddressed, and its effect on coastal access — the very thing the Coastal Act is meant to protect — would be to shrink affordable lodging options for visiting families.

1. The City Council justified key provisions of the ordinance using data it knew to be false

At a Pacifica City Council meeting on [DATE - TO BE CONFIRMED], Mayor Christine Boles held up a document provided by a local anti-STR advocacy group and stated that Pacifica STR operators charge approximately \$900 per night, using that figure to argue that even under the ordinance's proposed 60-day annual operating cap, an STR operator would still net over \$50,000 a year. Then-Mayor Sue Beckmeyer corrected her on the record, noting that the \$900 figure was not a representative nightly rate but a single listing's peak-season price, and that the actual average nightly rate for Pacifica STRs is roughly \$300 - the same figure borne out by the market data cited in Section 3 below. The 60-day cap was adopted regardless, without the underlying revenue analysis being corrected.

This is not an isolated data point. The head of the advocacy group that supplied the \$900 figure is a close personal friend of Mayor Boles, and throughout this process Mayor Boles has repeatedly dismissed data and reports submitted by STR owners and operators while citing that same group's unverified research. The Commission is being asked to certify an amendment to the City's Local Coastal Program whose central operating restriction was sized using a per-night rate roughly three times the actual market average - a number the City's own presiding officer at the time identified as inaccurate before the ordinance was adopted. I would ask the Commission to require the City to redo its economic justification for the 60-day cap using accurate rate data, and to place the meeting record on file so the Commission can confirm this exchange independently.

2. Pacifica cannot afford the revenue loss this ordinance would cause

Pacifica is in the middle of a genuine fiscal crisis. The city is already struggling to fully fund basic fire and police services, faces significant unbudgeted costs from its seawall project, and is now confronting the aftermath of the recent pier collapse. The city has an existing budget deficit that the Council has not identified a credible plan to close, and Council members have floated raising special taxes on residents to cover the gap.

Against that backdrop, STR activity brings in more than \$2 million annually to the city. This ordinance is expected to cut that revenue by more than 75%. The previous city manager told the Council directly, in a public meeting, that if the ordinance were adopted he would need to return with a list of city services that would have to be cut, because STR revenue is that significant a share of the general fund. The Council has not, to my knowledge, presented any plan for how it would replace this revenue or which services would be cut in its absence — it has instead moved forward with an ordinance that would eliminate a major funding source while simultaneously discussing new taxes on residents. I would ask the Commission to weigh this fiscal reality, particularly given the city's stated inability to maintain core public safety services and its exposure on coastal infrastructure the Commission itself has a strong interest in seeing properly maintained.

3. The ordinance would reduce affordable coastal access for visiting families

Pacifica has fewer than 300 hotel rooms citywide, and no new hotel projects are proposed over the next five years. STR housing fills the gap left by that limited hotel supply, and it does so in a way that is particularly well suited to how people actually visit Pacifica: many visitors come as multigenerational families who want to stay together under one roof, cook their own meals, and avoid the cost of booking multiple hotel rooms, which typically increases total lodging cost by 50-100% compared to a single STR.

The average STR in Pacifica rents for about \$300 a night, comparable to a single hotel room in the \$200-300 range — except an STR at that price houses an entire extended family, where a hotel stay at a similar nightly rate would require several rooms. If this ordinance discourages most STR operators and cuts supply by 75% as anticipated, basic economics says the remaining STRs and the limited hotel stock will both see prices rise as demand chases a smaller supply — the same dynamic seen in New York City after its 2023 short-term rental restrictions took effect. With no new hotels planned and STR supply slashed, a meaningful number of families will simply lose affordable access to the coast at Pacifica during the very type of multigenerational family vacation the Coastal Act's public access provisions are meant to protect.

Request

For these reasons, I ask the Commission to decline to certify this Local Coastal Program amendment as submitted. At minimum, I would ask the Commission to require the City to: (1) produce the underlying data and process record so the Commission can independently assess whether the ordinance was developed on a fair evidentiary basis; (2) conduct and publish a full fiscal impact analysis, including a specific plan for the service cuts or revenue replacement the previous city manager warned would be necessary; and (3) analyze the ordinance's effect on coastal access and lodging affordability for visiting families, consistent with the Coastal Act's public access and recreation policies, before any amendment is approved.

Thank you for your time and consideration ahead of the August 12 hearing. I am available to provide additional information or documentation the Commission may find useful.

Respectfully,

Albert Zhang
Pacifica Resident

From: [Arlene Zhao](#)
To: NorthCentralCoast@Coastal
Subject: PUBLIC COMMENT on Agenda Item 13 - LCP-2-PAC-25-0079-2 (Pacifica STRs) – OPPOSITION
Date: Thursday, August 6, 2026 11:06:33 AM

You don't often get email from azpacific@gmail.com. [Learn why this is important](#)

Dear Chair and Commissioners,

I am writing regarding the City of Pacifica's proposed short-term rental ordinance (Ord. No. 901-C.S.; LCP-2-PAC-25-0079-2) as it comes before the Commission for certification in the Coastal Zone. I hold a City short-term rental permit and operate in Pacifica, so I have a direct interest here — but my central concern is one the Commission is charged with protecting: keeping the California coast accessible and affordable to ordinary people.

The Coastal Act's promise is that the shoreline belongs to everyone, not only to those who can afford a beachfront hotel. In Pacifica, that promise depends heavily on short-term rentals. The city has very limited hotel capacity, and the rooms that exist are priced beyond the reach of many working- and middle-income families. For a family, a group of friends, or several generations traveling together, a whole-home rental split among the group is often the only affordable way to spend a weekend on this stretch of coast — at a per-person nightly cost frequently lower than a single hotel room. These are not luxury travelers. They are the ordinary families the Coastal Act exists to serve, and short-term rentals are how many of them reach the coast at all.

I share the Commission's and the City's underlying goals of protecting neighborhoods from nuisance and from speculative conversion of housing. My concern is with one transition detail that, as written, removes existing coastal-access supply all at once — and it is easily fixed.

Section 9-4.4912(b)(ii) already exempts permits issued before certification from the new restrictions, including the 60-night cap — but only "until the short-term rental permit is renewed, terminated or revoked." Because every permit must be renewed each October, that exemption expires within months, and the existing stock of affordable coastal lodging disappears in a single cliff.

I ask the Commission to condition certification on making that exemption durable: tied to continuous renewal and good standing, applying only to operators permitted before certification, lost permanently if the permit lapses or is revoked, and non-transferable on sale — so the exempt pool only shrinks over time. This keeps existing affordable units available to visiting families while the full new framework — the 60-night cap, primary-residence requirement, and 150-permit cap — applies to every new entrant. The City still achieves its long-term reduction in STR density; it simply does so gradually, through attrition, rather than through an immediate loss of coastal access.

A brief grace period followed by a cliff serves no one. A durable, well-bounded exemption keeps the coast open to ordinary families today while the City's stricter rules take hold over time. I respectfully urge the Commission to condition certification on strengthening Section 9-4.4912(b)(ii) accordingly.

Thank you for your work protecting and providing access to the California coast, and for considering this comment.

Respectfully,
Tong Zhao
567 Esplanade Ave, Pacifica, CA
310-980-9932

From: [aaron z](#)
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Tuesday, August 4, 2026 10:40:48 PM

You don't often get email from zundapkid@gmail.com. [Learn why this is important](#)

Dear Commisioners and interested parties:

As a resident of Pacifica for over 37 years and a landlord for 23 years, I feel the limitations in question regarding STR's are important to maintain local interest and responsibility within the community.

Local ownership will protect our community from detached , impersonal investors.

At the same time, as compensation to local owners , I feel the 60 day cap is too restrictive. It seems fair that the limit be extended to 180 days, if the owner is occupying the property for the remainder of the year.

That would greatly increase the access and visitor night stays per year for each allowed dwelling, while maintaining a healthy degree of commitment to the community and neighborhoods where the rental is located.

In in other words, the proposed deletions by the Coastal commission go too far in opening up our community to foreign and non-resident owners and at the same time increasing our exposure to visitors throughout the year, whom have no accountability with regards to the ownership.

I feel this compromise satisfies both community interest in keeping ownership local , while at the same time providing more lodging availability for visitors.

Thank you for your consideration,

Aaron Zorndorf

Pacific Manor,

From: [aaron z](#)
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Saturday, August 8, 2026 10:30:18 PM

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Based on clarification from C. Boles I want to modify my comment , the only change is in the carding from local owners to local managers. The reasoning and argument remains the same. Revisions in red.
As follows;

As a resident of Pacifica for over 37 years and a landlord for 23 years, I feel the limitations in question regarding STR's are important to maintain local interest and responsibility within the community.

Local **managers** will protect our community from detached , impersonal investors.

At the same time, as compensation to local

management , I feel the 60 day cap is too restrictive. It seems fair that the limit be extended to 180 days, if the **manager** is occupying the property for the remainder of the year.

That would greatly increase the access and visitor night stays per year for each allowed dwelling, while maintaining a healthy degree of commitment to the community and neighborhoods where the rental is located.

In in other words, the proposed deletions by the Coastal commission go too far in opening up our community to foreign and non-resident **managers** and at the same time increasing our exposure to visitors throughout the year, whom have no accountability with regards to the **management**.

I feel this compromise satisfies both community interest in keeping ownership local , while at the same time providing more lodging availability for visitors.

Thank you for your consideration,

Aaron Zorndorf

Pacific Manor,

From: ExecutiveStaff@Coastal
To: Ringuette, Oceane@Coastal
Subject: FW: Not easy to find the way to enter opinion on Pacifica short term rentals issue. Seems to make it less likely for citizens to repsond
Date: Monday, August 10, 2026 1:00:13 PM

From: Shotsy Faust <shotsyfaust@icloud.com>
Sent: Friday, August 7, 2026 1:23 PM
To: ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>
Subject: Not easy to find the way to enter opinion on Pacifica short term rentals issue. Seems to make it less likely for citizens to repsond

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To CCC,

I am writing with dismay as to why the Coastal Commission would back the Air B n B leaders after such hard work by our community and City Council to try and protect our community from this manipulation. The regulations that apply to Half Moon Bay and the East side of Highway one were to apply to the West side as well. Now there is a plan to have no regulations, such as home ownership or 60m day limits to the West side. This is a ruse! and a money grab.

I understand the need for income for our town, and I am not anti short term rentals but there must be guardrails and guidelines to protect our community. This is not Malibu!! This is not a wealthy place, but a gorgeous area and community that should not be turned into a carnival.

Our community must be considered. With the regulations in place Air BnB would still be making money, but there would be some supervision of noise, length of stay and oversight by actual owners who live nearby or can respond to issues like upkeep etc. Owners who live out of state or another country are not readily available for these types of protections. This new ruling would make Beach boulevard more of loud party center than it already is without any protections.

Your documents try to push the idea of "affordability" to short term rent these homes for vacation purposes while pushing out long term renters who live there., It is not true that air bnb are more affordable . Look at the costs in the thousands of dollars to rent these for a week or long weekend. Our hotel rooms are still cheaper. You are not supporting our community. Just catering to the wealthy.

What is the CCC getting out of this? Something is fishy here!! Why were the short term company reps able to visit CCC and confer? Did our community or City Council get the same treatment? What reason could the CCC have for having different rules for the East and West side of Highway 1? and Half Moon Bay. Greedy people who are not from this community is my guess and big business having a say in our town and our Coasts future.

SC Faust

Long time resident of Westview neighborhood and an advocate for our Pacifica Coast

From: ExecutiveStaff@Coastal
To: [Ringuette, Oceane@Coastal](mailto:Ringuette,Oceane@Coastal)
Subject: FW: City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals)
Date: Monday, August 10, 2026 12:59:53 PM

-----Original Message-----

From: Armetta Parker <mettapark@gmail.com>
Sent: Friday, August 7, 2026 1:27 PM
To: ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>
Subject: City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals)

[You don't often get email from mettapark@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

California Coastal Commission Commissioners:

I am writing in opposition of Coastal Commission staff's recommendation to the commission to strip from our STR ordinance the primary residence requirement for STR operators and the 60-night max on unhosted (whole house) rentals for Pacificans west of Hwy 1..

As an almost 15-year resident living east of Highway 1, our family endured years of living next door to an unhosted STR. Before Pacifica City Council adopted the new ordinance, overflowing trash, all hours of the night parties houseing far more than two people per bedroom were the norm. The change has been dramatic. Even before full implementation of the ordinance on November 1, our neighborhood benefitted from the ordinance provisions that went into effect immediately. Neighborhood STRs became long-term rentals or went on the market for what has turned out to be several new families contributing to our community. That should be the case for residents on the coast.

Please choose community over what is often unenforced commerce at the expense of long-term residents. Choosing community over a revenue source that at best appears to break with the costs of enforcement. These unhosted STRs should not be allowed to continue to operate as "business as usual"

I encourage you to support the City of Pacifica STR ordinance as written. When this ordinance comes before you as an agenda item your approval of what is in place east of Highway 1 will give our coastside neighbors the quiet and peaceful enjoyment of their homes that has been restored to many of us.

The health, safety, and welfare of our neighborhoods west of Hwy 1 is vital to keeping Pacifica the welcoming place we love to call home and tourists enjoy visiting. Homes are for neighbors. They should not be treated like inns with no inn keeper.

Respectively,
Armetta Parker

Friday August 7, 2026

Dr. Hanna Steinbach
227 Stanley Avenue
Pacifica, CA 94044

To All Members of the California Coastal Commission:

Re: City of Pacifica LCP Amendment No. 2-PAC-25-0079-2 — Short-Term Rental Regulations

Dear Members of the California Coastal Commission:

My name is Hanna Steinbach, and I have been a resident of Pacifica for almost ten years, more specifically in Pedro Point. I am writing as a long-term resident, a co-parent, an attorney, and, importantly, as someone who actually hosts short-term rental guests in my home.

My experience gives me a somewhat different perspective on this issue. I am not opposed to short-term rentals or to welcoming visitors to Pacifica. In fact, I actively participate in providing accommodations to visitors. As a co-parent, my need for space in my home fluctuates depending on when my children are with me. I therefore rent out rooms in my house when those rooms are not needed by my family. This allows me to make productive use of space that would otherwise sit empty while providing relatively affordable accommodations to people who want to visit Pacifica and the coast.

I believe there is, however, a fundamental difference between **a hosted short-term rental in a home where a resident lives and an unhosted short-term rental in which an entire single-family home is operated as transient lodging**. I strongly support preserving that distinction in Pacifica's regulations.

Coastal access does not require unhosted STRs

I strongly disagree with the Staff's conclusion that the proposed primary-residence requirement and 60-night limit on unhosted STRs are inconsistent with the Coastal Commission's policies promoting public access and visitor-serving opportunities.

The Staff's analysis appears to conflate two separate issues: **the amount of visitor accommodation available in Pacifica and the form that accommodation should take**.

If the concern is that the 60-night limit would unnecessarily reduce the number of nights available to visitors, there is a straightforward solution: remove the cap, or substantially increase it, for **hosted** short-term rentals.

There is no need to allow unlimited unhosted STRs in residential neighborhoods in order to provide additional visitor capacity.

Pacifica already has hotels, short-term rentals, and other visitor accommodations. The City is not attempting to close Pacifica to visitors. The question before the Commission is whether the goal of coastal access requires the conversion of single-family homes in residential neighborhoods into essentially full-time transient lodging businesses.

I do not believe it does.

Nothing in the LUP, in my reading, establishes a policy that coastal visitor accommodations should be created by converting residential single-family homes into unhosted vacation rentals. Promoting coastal access and visitor-serving opportunities does not mean that every residential property must be available for transient occupancy.

To the contrary, **the City's residential zoning framework reflects a deliberate decision to reserve certain parcels primarily for residential living rather than commercial uses.** An unhosted short-term rental of an entire single-family home is fundamentally different from a resident hosting visitors in their home. In the former case, the property is effectively being operated as a transient lodging business while remaining located in a residential zone.

The Coastal Commission should therefore not interpret general LUP policies promoting visitor-serving opportunities as requiring the City to permit a commercial lodging use in every residential neighborhood. Doing so would effectively nullify the distinction between residential and visitor-serving land uses that the City's land-use framework was designed to maintain.

There is a meaningful difference between saying that visitors should have access to Pacifica's coast and saying that every home in a residential neighborhood should potentially function as a hotel.

Hosted STRs provide a less damaging alternative

Hosted STRs provide a way to advance both objectives.

A hosted STR allows visitors—including families and larger groups—to stay in Pacifica while the property remains someone's home. The resident host is present and accountable. If there is excessive noise, a parking problem, an occupancy issue, trash, or another problem, there is someone on site who can address it.

That is fundamentally different from an unhosted STR.

When you live next to an unhosted STR, you do not have an actual neighbor in the ordinary sense of the word. Instead, you have a constant succession of temporary occupants who arrive with their luggage, stay for a few days or weeks, and leave again. There is no expectation that they will become part of the neighborhood or that you will see them again.

There is also often nobody responsible on site to speak with when something goes wrong.

This matters enormously in Pedro Point.

Pedro Point is a close-knit residential community. We have regular community events at the firehouse, progressive dinners, and many informal connections among neighbors. We know one another. Our children know one another. We look out for one another.

That is what makes this a community rather than simply a collection of houses.

Unhosted STRs erode that residential character. They replace permanent residents with transient occupants and transform homes that could house families into commercial lodging operations.

Environmental justice does not require converting homes into hotels

I also strongly disagree with the Staff's argument that the City's proposed restrictions are particularly problematic when viewed through an environmental-justice lens.

I fully support the goal of ensuring that people who do not live in Pacifica—including families, larger groups, inland communities, and people who may otherwise have fewer opportunities to enjoy the coast—can visit and stay in coastal communities.

But that goal does not require unlimited unhosted STRs.

The Staff's argument assumes that restricting unhosted STRs necessarily restricts coastal access. It does not.

Visitors can stay in hotels. They can stay in hosted STRs. They can rent rooms within occupied homes. They can use other visitor-serving accommodations.

If the concern is the **quantity** of accommodations available to visitors, Pacifica could remove any numerical cap on hosted STRs. That would expand visitor capacity without sacrificing the residential character of neighborhoods.

If the concern is **affordability**, hosted accommodations can also provide a broader range of price points than hotels, including rooms and other accommodations that may be more accessible to families and visitors with limited budgets.

Moreover, I question the assumption that allowing visitors to rent an **entire single-family home** in Pedro Point or other desirable coastal residential neighborhoods is principally an issue of

affordability. An entire home in these neighborhoods is a scarce and valuable form of accommodation, and choosing to rent an entire house rather than a hotel room, a room in an occupied home, or another shared accommodation generally reflects the ability and willingness to pay a premium for substantially more space, privacy, and exclusivity at the cost of neighbors in the community. **Access to the coast does not require access to an entire single-family home.**

If the Commission's environmental-justice concern is ensuring that families, larger groups, and visitors with fewer financial resources can experience the coast, that goal is better served by encouraging a diversity of visitor accommodations—including hosted STRs—rather than by permitting the unlimited commercial use of entire homes in residential neighborhoods.

In other words, the relevant question should be whether visitors can affordably access Pacifica and its coast, not whether every visitor who can afford it should have the opportunity to rent an entire single-family home in a residential neighborhood.

Environmental justice should not mean that the residents of coastal communities must bear the neighborhood impacts of unlimited commercial conversion of residential homes when less damaging alternatives are available.

The people who live in Pacifica are part of the community whose interests should also be considered.

Residential neighborhoods need actual neighbors

The impact of an unhosted STR is not limited to the occasional nuisance or a violation of a noise ordinance.

The fundamental problem is the transformation of a residential property into a transient commercial use.

A family living next door becomes a series of unrelated visitors. A child's potential neighbor becomes someone who may be gone before the child ever learns their name. A homeowner who could participate in the community becomes an absentee operator whose property is occupied by strangers.

And when problems occur, there may be nobody there to address them.

These impacts cannot always be solved through additional parking requirements, noise rules, trash requirements, or enforcement mechanisms. The absence of a resident is itself a fundamental difference.

A hosted STR, by contrast, preserves the essential residential relationship. The property has a resident. The host has a stake in the neighborhood. Guests have someone on site who can explain and enforce the rules. The property remains someone's home.

The Commission should preserve the distinction between hosted and unhosted STRs

I therefore respectfully urge the Coastal Commission to reject the Staff's recommendation to eliminate the City's primary-residence requirement and 60-night limit for unhosted STRs.

If the Commission believes that additional visitor-serving capacity is necessary, there is a much better solution: **allow hosted STRs without a numerical cap, or with a substantially higher cap.**

That approach would directly address the Staff's concern about the quantity of visitor accommodations while preserving the residential character of Pacifica's neighborhoods.

It would also recognize an important distinction that I believe has been overlooked in the Staff's analysis: **not all STRs have the same impact.**

I am an STR host myself. I welcome visitors into my home. I benefit from the ability to share my home with people visiting Pacifica, and I believe visitors benefit from having affordable alternatives to hotels.

But I also live here.

I have neighbors. My children have neighbors. I participate in this community. I care about what happens on my street and in Pedro Point.

That is the model I believe Pacifica should encourage.

Pacifica can be welcoming to visitors without turning residential neighborhoods into hotel districts. We can expand coastal access without eliminating the distinction between a home and a commercial lodging property.

The choice should not be between coastal access and residential communities. We can have both.

I respectfully ask the Commission to allow Pacifica to maintain its primary-residence requirement and meaningful restrictions on unhosted whole-home STRs, while allowing hosted STRs to provide as much additional visitor-serving capacity as necessary.

Thank you for considering the perspective of a nearly ten-year Pacifica resident, community member, parent, and short-term rental host.

Sincerely,

Hanna Steinbach
Pacifica, California

From: ExecutiveStaff@Coastal
To: Ringuette, Oceane@Coastal
Subject: RE: Agenda item 13.b August 12, 2026
Date: Monday, August 10, 2026 2:09:57 PM

From: michele@mktcalif.me <michele@mktcalif.me>
Sent: Friday, August 7, 2026 9:13 AM
To: ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>
Subject: Agenda item 13.b August 12, 2026

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Commission members:

Don't let big money from outside corporate interests influence your decision! Pacifica is entitled to the same considerations as you have granted Half Moon Bay and other coastal cities. This is our community and the Pacifica short term rental ordinance was the result of months and months of input from the Pacifica community. Limiting the number of days that can be rented keeps our community from becoming a land of hotels with people who don't live here and don't pay taxes and don't care about our city. Ensuring that there is a local human representative who can be contacted when there are issues makes nothing but good common sense.

Please don't base your decision on the number of pages submitted by paid lawyers. Listen to the people who actually live here and have had to endure years of abuse from out of town corporations and unruly "guests" who come here to party and ignore our city's residents.

Michele Trausch
1153 Barcelona Drive
Pacifica CA 94044

From: [Caitlin Quinn](#)
To: [NorthCentralCoast@Coastal](#)
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Friday, August 7, 2026 1:36:39 PM
Attachments: [PastedGraphic-6.png](#)
[PastedGraphic-7.png](#)
[PastedGraphic-8.png](#)
[PastedGraphic-9.png](#)

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Dear Honorable Members of the California Coastal Commission:

As a full-time resident of Pacifica for nearly 10 years, I am writing to **strongly oppose Coastal staff's recommendation to strip the primary residence requirement and 60-night annual max for unhosted rentals from Pacifica's STR ordinance (LCP Amendment LCP-2-PAC-25-0079-2)** and urge you to **instead approve the ordinance without amendment, as staff originally recommended in its January 15, 2026 report.**

Unhosted STRs: A Pacifica Resident's Personal Experience

In 2017, I purchased my dream home in Pacifica's West Sharp Park. I am assuredly not wealthy. This is the only home I own, and given I work in the non-profit arts world, it took thirty years to save enough money for its downpayment.

My family and I lived peacefully and very happily in our home until, in 2022, the co-founders/co-CEOs of the Marbella Lane Corporation (<https://www.marbellalane.com>), a luxury vacation rental company owning and/or operating at one time 20+ properties in Pacifica, purchased our neighbor's home at 1987 Beach Blvd. **These corporate investors paid \$200,000 over the asking price in a cash deal—an aggressive transaction nearly impossible for any family to compete with—and flipped it immediately into a full-time, unhosted STR.** In the four years since Marbella Lane's co-founder/Co-CEOs Yanan Sun and Mei Wing Chang have owned 1987 Beach, we have never once met them, and it is my understanding (gleaned from Pacifica's STR permit records) that they live in a 24-hour guard-gated community on the Newport Coast that doesn't allow unhosted STRs.

The negative impact on our lives and that of our fellow neighbors began immediately: parties; noise from "checking in" and "checking out" activities that frequently took place between midnight and 4 a.m.; light pollution from the multiple strings of party lights in the back yard that stayed on 24/7; overflowing trash receptacles that sat for weeks; rows of people smoking outside our front door or on the property's balcony, filling our home with cigarette or weed smoke that triggered my vestibular migraine condition; trespassing; guests dumping their unsorted trash into our home's bins; etc. **To date, there have been 30 calls made to the police** by my family and other neighbors on unruly or threatening guest behavior at 1987 Beach **with four of those calls being escalated to criminal investigation and assigned case numbers.** One of those criminal cases involved renters holding a big Super Bowl party at 1987 Beach and then dumping their unsorted trash in both a neighbor's trash receptacles and along the sea wall, endangering our fragile coastal environment (see photo below):



Of particular note is the criminal activity that took place on October 19, 2025, wherein the Marbella Lane Corporation's renter at 1987 Beach came onto my property and vandalized our home's security cameras. When the Marbella Lane Corporation was informed of this, their "good neighbor" response was to permit this man to remain in their unhosted STR for another six nights.

No resident of any city anywhere should have to live like this. (What's always been of particular interest to me is that the owners of unhosted STRs don't ever seem to live next door to unhosted STRs, and especially not those operated by other owners. This speaks volumes.)

Pacifica Sought—and Achieved—the Right Balance Between Ensuring Coastal Access and Protecting Its Neighborhoods from Commercialization

Pacifica's STR ordinance is the result of **eight (8) years of significant community discussion taking place during 14 City Council meetings, including four study sessions dedicated to STRs and three separate Planning Commission meetings.** Robust public comment from both sides of the STR issue—residents and STR owners, alike—was heard in Council meetings that sometimes lasted until 1 a.m. The ordinance you have before you was not created in a vacuum, nor was it "rammed through" by some small group of overly vocal residents as Pacifica for Responsible Tourism falsely claims. It was crafted from hours and hours of deliberate, thoughtful, and highly engaged community input. **It was also crafted with Coastal staff's direct input and Commissioner encouragement.**

At its June 13, 2024 meeting, Coastal staff and Commissioners alike acknowledged that Pacifica's 150-STR city-wide cap was a *"first step to regulate the number of short-term rentals in order to*

The City of Pacifica followed the Commissioners' directives in, and worked with its staff on the creation of, its STR ordinance — **an ordinance that correctly balances the need for low-cost visitor accommodations while protecting Pacifica's "special communities and neighborhoods which, because of their unique characteristics, are popular visitor destination points," per LUP Policy 30253(e).** Pacifica's "unique characteristics"—the very things that make it attractive to visitors—are being hollowed out by the proliferation of unhosted STRs in its coastal zones. **On Beach Blvd., 55% of the homes directly on the street or that share frontage with it are unhosted STRs.** When visitors come to the area, they now have less of a chance of meeting a resident than they do another tourist. How does that preserve a coastal area's "unique characteristics"?

This is a win-win proposition.

Coastal staff employs flawed logic and makes uninformed judgments in its July 30th report. Consider the following statement from that document's page 17:

This is a false and illogical assumption. An STR operator who wishes to rent out their home during that 10-month period can rent it out as either a hosted STR each night of the 10-month period or as a mid-term (i.e., 31-days-plus) rental for the remaining four months of the year that they are not residing in it or renting it out the 60 nights unhosted. Mid-term rentals have become a lucrative and viable option for homeowners, and given that the guests they tend to service include business travelers, other homeowners needing to vacate their own properties due to extensive repairs, and traveling nurses, they do not bring to residential neighborhoods the type of destabilizing and nuisance activities most closely associated with unhosted STRs.

Additionally, it is truly puzzling that staff's July 30, 2026 report ignores the fact that the removal of any unhosted STRs can be made up by hosted ones. In fact, we have been seeing this happen. For instance, 1138 Grand Teton, a very large (six-bedroom) unhosted STR just recently converted into a hosted rental.

Oddly, Coastal staff attempts to side-step the overwhelming evidence that **hosted STRs provide the low-cost visitor accommodations the Commission champions while unhosted ones do not**. To illustrate, please see below screenshots demonstrating the high prices of Marbella Lane Corporation unhosted STRs located directly on Pacifica's coast:

vrbo.com

https://www.vrbo.com/search?startDate=2026-06-19&endDate=2026-06-21&adults=2&se...

Checkout

Email address *

Phone country/region *
USA +1

Phone number *

Payment details

Safe, secure transactions. Your personal information is protected.

Card details



Name on card *

Card number *
0000 0000 0000 0000

Expiration date *
MM/YY

Security code *
CVV

Billing address

Phone country/region *
United States of America

Address *

Address 2

City *

@ Marbella Lane - Home With Majestic Ocean Views

Pacifica, CA

8.6 Excellent

44 reviews

Check-in

Check-out

Thu, Jun 18, 2026, 4:00pm
Sun, Jun 21, 2026, 11:00am

3 nights, 2 guests

Property highlights

Ocean view

Washer

Kitchen

Dryer

Entire home

3 bedrooms

3 bathrooms

Sleeps 8

1620 sq ft

Message the host

Price details

\$2,037.00 x 3 nights

\$6,111.00

Taxes

\$834.83

Total

\$6,945.83

https://www.vrbo.com/search?startDate=2026-06-19&e...

Checkout

Checkout

(e.g. Smith)

Email address *

Phone country/region *

USA +1

Phone number *

Payment details

Safe, secure transactions. Your personal information is protected.

Card details

Name on card *

Card number *

0000 0000 0000 0000

Expiration date *

MM/YY

Security code *

CVV

Billing address

Phone country/region *

United States of America

Address *

Address 2

City *

@ Marbella Lane - Home With Majestic Ocean Views

Pacifica, CA

8.6

Excellent

44 reviews

Check-in

Check-out

Thu, Aug 6, 2026, 4:00pm

Sun, Aug 9, 2026, 11:00am

3 nights, 2 guests

Property highlights

Ocean view

Washer

Kitchen

Dryer

Entire home

3 bedrooms

Sleeps 8

3 bathrooms

1620 sq ft

Message the host

Price details

\$1,797.00 x 3 nights

\$5,391.00

Taxes

\$730.83

Total

\$6,121.83

Last name *

(e.g. Smith)

Email address *

Phone country/region *

USA +1

Phone number *

Payment details

Name on card *

Card number *

0000 0000 0000 0000

Expiration date *

MM/YY

Security code *

CVV

Billing address

Country/Territory *

United States of America

Address *

Address 2

City *

State *

Billing ZIP code *

Marbella Lane-Oceanfront Retreat w Stunning View

Pacifica, CA

6.0

1 review

Check-in

Check-out

Thu, Sep 3, 2026, 3:00pm

Sun, Sep 6, 2026, 10:00am

3 nights, 2 guests

Property highlights

Kitchen

Dryer

Washer

Outdoor Space

Entire home

3 bedrooms

Sleeps 6

3 bathrooms

500 sq ft

Message the host

Price details

\$1,299.03 x 3 nights

\$3,897.10

Taxes

\$488.81

Total

\$4,385.91

Rates are quoted in USD (\$).

These are not low- or moderately priced STRs, **they are luxury-priced accommodations, demanding a three-night minimum, that are outside the reach of any but the wealthy.** According to AirROI, the STR industry market analyst (<https://airroi.com/airbnb-data/united-states/california/pacific>), the Marbella Lane Corporation, with 10 unhosted rentals in Pacifica, is the top earning operator in our city, pulling in nearly \$1 million annually:

None of the above unhosted STR owners/operators are “hosts” looking to supplement income to help pay their mortgage or to afford home repairs. These are investors interested in nothing but how effectively they can commoditize a property in a residential neighborhood.

Coastal staff suggests that the ordinance's "'natural person' operator" clause and/or the "one STR per operator" restriction will "avoid the type of mass commercialization that has been raised as a concern in Pacifica. This will provide a meaningful barrier to corporate entities attempting to buy up large numbers of properties for the purposes of turning them into STRs."

Those two elements of our STR ordinance, while important, are easily worked around. For instance, a corporation that buys up, say, 30 Pacifica homes has only to then register as the unhosted STR operator of each property a different “natural person” employee or family member. Thusly, said corporation will own and operate 30 Pacifica homes as unhosted STRs. **The only elements of the ordinance that will keep this scenario from happening are the primary residence requirement for STR operators and the 60-night max on unhosted rentals.**

There are already “good neighbor” guidelines present in Pacifica’s current coastal STR ordinance. They are frequently ignored by renters. This behavior will undoubtedly continue, **and STR owners will treat the fines for violating “good neighbor policies” as the cost of doing business, passing those costs onto their paying guests, thus making unhosted STRs even more expensive for visitors.**

The combination of the primary residence requirement for STR operators and the 60-night annual cap on unhoused STRs in Pacifica's ordinance provides the **ONLY** genuine and effective protection against the mass commercialization of our neighborhoods. Removing those two elements would gut the ordinance's efficacy, **leaving Pacifica in the untenable position of being one of only three cities throughout all of San Mateo County without some combination of a primary residence requirement and an unhoused night limit**. Coastal staff's recommendation of their elimination will essentially "blood the waters," attracting to Pacifica every shark in the form of STR corporate and professional investors, both near and far.

The primary residence requirement of STR operators and the cap on the number of unhosted rental nights in Pacifica's STR ordinance are not only commonplace in dozens of other STR ordinances throughout the State, **they are elements that the Coastal Commission itself has approved for other coastal cities, most notably Half Moon Bay and Del Mar.** It is most alarming then to witness Coastal staff's complete about-face on these two critical ordinance elements in a short, six-month period, going from recommending approval of the ordinance with no suggested amendments in January, 2026 to recommending approval only with the primary residence requirement and 60-night unhosted cap removed in July, 2026. This alarm rings even louder when one considers the outsized lobbying campaign Airbnb, its attorney Frank Angel, and its local advocacy group, Pacifica for Responsible Tourism, have been engaging in with the Commission, including an exparte meeting with Airbnb.

representatives and their hired advocates and the clogging up of Coastal staff communications with hundreds of pages of duplicative letters and biased studies.

Hosted STRs are Fully Supported in Pacifica

Pacifica's ordinance was crafted in full support of hosted STRs, permitting them to operate 365-nights per year. Additionally, the resident operators of hosted STRs may operate them as unhosted rentals 60 nights per year. **This provides an appropriate balance between the need for visitor accommodations and the need to maintain residential "unique characteristics."**

I fully support the operation of hosted STRs, which are the only true form of "hosting" visitors and providing them with low-cost coastal accommodations. When I first moved to Pacifica, the neighbors with whom we shared a wall STR'd the ground level of their home. Never once did we experience noise disturbances or other nuisance activities. This is because primary residents were on hand, **actually hosting these visitors.** (NOTE: One does not "host" anyone when that person arrives at your home to find it deserted with a lock box to provide entry they have paid for. That's called a retail lodging transaction.)

Conclusion

I thank you sincerely for reading my letter and **urge you to reject Coastal staff's recommended modifications of Pacifica's STR ordinance and to preserve its primary residence requirement for STR operators and its 60-night annual cap on unhosted rentals.**

I am not the handsomely compensated public policy representative of a \$9 billion tech Goliath. Nor am I a paid Airbnb advocate, one of its vendors, or a member of one of its many hired lobbying organizations.** I'm just a working-class resident of Pacifica whose life, health, and safety have been severely compromised by living next door to an unhosted STR.

I hope there's still a world in which voices such as mine matter.

Respectfully submitted,

Caitlin Quinn

West Sharp Park, Pacifica

***SOLD:** 488 Monterey, 1 Sequoia Way, 916 Park Pacifica, 1331 Aspen, 847 Arguello, 63 Kathleen Court, 84 San Jose, 1050 Yosemite, 425 Farallon, 279 Sterling, 1159 Barcelona

CONVERTED TO FULL-TIME RENTAL: 560 Talbot, 520 San Pablo Terrace, 339 Nelson, 1168 Crespi, 437 Norfolk, 268 Milagra, 1561 Grand Avenue (two cottages at this one address), 795 Montezuma, 260 Juanita.

I'm very proud that Scott Emblidge of Moscone Emblidge & Rubens is my personal attorney, and per my request, he graciously agreed to help our grassroots neighborhood coalition, Pacifica Homes Are Not Hotels (PHANH), with legal support for a generously discounted rate. His retention was paid for personally by Lyla & Bryan Reinero, Mark Stechbart and Dian Emerson, Peter Garenani, and me. **I mention this to rebut the false attacks made by Pacifica for Responsible Tourism that PHANH is receiving funding from outside groups. As a grassroots neighborhood coalition, all of PHANH's many expenses are paid for by its Pacifica resident members.

From: [Margo Meiman](#)
To: NorthCentralCoast@Coastal
Subject: Public Comment on August 2026 Agenda Item Wednesday 13b - City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short Term Rentals).
Date: Friday, August 7, 2026 7:29:42 AM

You don't often get email from margo.meiman@gmail.com. [Learn why this is important](#)

Dear Commissioners,

I am writing to urge you to adopt Pacifica's 2025 Short-Term Rental (STR) ordinance in the coastal zone.

Specifically, I strongly oppose the Commission staff's recommendation to remove the primary residence requirement and 60-night max on unhosted STR rental nights from Pacifica's STR ordinance.

My family and I have lived in Pacifica for 21 years, and between 2010 and 2018, the property across the street (358 Olympian Way) was operated as a short-term rental. I will not spend time here relaying stories of the nuisance that #358 became for us and other neighbors. Police were called countless times over those eight years, and ultimately there were three lawsuits between the owner and the adjacent property owners.

Happily, the home was sold in 2018, and now a 3-generation family resides across the street. STRs can and DO return to the community for housing!

Please know that I am in full support of *hosted* STRs. Pacifica's 2025 STR ordinance fully supports them, and it welcomes visitors through a variety of accommodations, while maintaining the residential character of our coastal neighborhoods.

As you know, Pacifica's City Council has been discussing STRs with community members for eight years and, during that time, has discussed the subject of STRs at fourteen Council meetings and in four study sessions dedicated to the topic. City staff have devoted hundreds of hours to the issue. Additionally, our Planning Commission has held three public meetings on STRs in Pacifica. The development of the 2025 STR ordinance was a true community effort.

I am shocked, therefore, with the Commission's recommendation of removing the primary residence requirement and the 60-night cap on unhosted rentals from Pacifica's STR ordinance—the two most critical elements necessary to protect our scarce housing stock from corporations and outside real estate investors who seek to commoditize our residential neighborhoods.

Even with the City's 150-STR cap, primary residence, and a limit of 60 nights per year for unhosted rentals, Pacifica would still have 54,750 STR nights available per year in *hosted* rentals, with fully 9,000 of those nights available as unhosted rentals. This is a robust amount

of visitor accommodations!

If the two key elements of Pacifica's STR ordinance—the primary residence requirement and the 60-night cap on unhosted rentals—are taken away, Pacifica will then be only one of two other cities in all of San Mateo County without these requirements. This will leave our City with zero protection against corporations and out-of-town investors taking away much-needed housing and commercializing our neighborhoods.

Once again, I urge the Commission to adopt Pacifica's 2025 Short-Term Rental (STR) ordinance in the coastal zone so that the full ordinance applies to the whole of Pacifica.

Thank you,

Margo Meiman 377 Olympian Way Pacifica, CA 94044



August 10, 2026

Chair Meagan Harmon and Honorable Commissioners
California Coastal Commission
North Central Coast District
455 Market Street, Suite 300
San Francisco, CA 94105

Re: August 12, 2026 Agenda Item W13b. City of Pacifica LCP Amendment No. LCP-2-PAC-25-0079-2 (Short-Term Rentals). SUPPORT IF AMENDED.

Dear Chair Harmon and Commissioners:

The Bay Area Council is a business sponsored public policy organization representing employers across the nine county Bay Area. Housing affordability is the central economic problem facing our region, and coastal access is one of the few amenities our workforce can still enjoy without wealth. Item W13b sits at the intersection of both. We support certification of the City of Pacifica implementation plan amendment, but only if the Commission takes two actions:

1. Adopt the staff modifications removing the primary residence requirement and the 60 night annual limit on unhosted rentals.
2. Grandfather existing permitted short term rentals in multifamily units.

The Coastal Act requires that maximum access and recreational opportunities be provided for all the people, consistent with public safety, private property rights, and resource protection. PRC 30213 requires that lower cost visitor and recreational facilities be protected, encouraged, and, where feasible, provided. The standard of review for an implementation plan amendment is conformity with, and adequacy to carry out, the certified land use plan. An ordinance that removes most of the coastal zone's lower cost overnight lodging must clear that bar on the evidence, not local preference.

Commission staff has recommended striking the primary residence requirement and the 60 night limit for unhosted units. Those provisions do the most damage to coastal access and the least work against nuisance, and we support the modifications without reservation. Our remaining concern is the multifamily prohibition, which by the record's count would eliminate roughly three dozen operating listings. Multifamily units are the lower cost end of the visitor lodging market, precisely the price point the Coastal Act was written to protect.

We take the housing affordability rationale seriously, which is why we do not find it persuasive here. Dedicated short term rentals are a fraction of one percent of Pacifica housing stock, so converting all of them back to long term occupancy tomorrow would not move rents or home prices. Pacifica needs an enormous amount of new housing just to resolve its existing needs for people already in the region. Anything that distracts from increasing housing stock on those levels is a distraction from real solutions.

On that variable the City record is thin: Pacifica has permitted only a small share of its lower income allocation under the 2023 to 2031 regional housing needs assessment. We would rather help

P. 415.946.8777
www.bayareacouncil.org

Bay Area Council
The Historic Klamath
Pier 9, The Embarcadero
San Francisco, CA 94111

Bay Area Council
PO Box 5135
Berkeley, CA 94705

Bay Area Council
1215 K Street, Suite 2220
Sacramento, CA 95814



Pacifica on housing production, without conditions, than watch the coastal zone absorb the cost of a policy that will not solve the problem but will certainly reduce the stock of low cost visitor serving accommodations.

Grandfathering existing multifamily rentals is basic fairness, and it reduces the City's litigation exposure. These owners obtained permits and complied with the rules under the LCP provisions this Commission certified in June 2024. Twenty months is not a reasonable period over which to invite reliance and then extinguish it, and applying the prohibition prospectively gives the City what it wants going forward at no cost.

Pacifica is among the most reachable open coastline for families who live inland and cannot absorb a resort rate. Every restriction certified here is felt by those visitors. We respectfully urge the Commission to certify the amendment only as modified to remove the primary residence requirement and the 60 night cap, and to grandfather existing permitted multifamily rentals. Thank you for your consideration, and please feel free to contact me with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Louis Mirante'.

Louis Mirante
Senior Vice President, Public Policy, Housing
Bay Area Council