

CALIFORNIA COASTAL COMMISSION

SOUTH CENTRAL COAST DISTRICT
89 SOUTH CALIFORNIA ST., SUITE 200
VENTURA, CA 93001
(805) 585-1800



April 22, 2021

Richard Mollica, Planning Director
City of Malibu
23825 Stuart Ranch Road
Malibu, CA 90265-4861

Re: Local Coastal Program Amendment No. LCP-4-MAL-20-0083-2 (Short-Term Rentals – Malibu
LCPA No. 19-003)

Dear Mr. Mollica:


Thank you for the submittal of additional information on April 8, 2021 and April 13, 2021 (via email) in response to our incomplete letter of January 13, 2021 regarding the subject LCP amendment. However, our review of your submittal indicates that further clarification and information requirements are needed for our analysis of the amendment. Please provide the following information:

- a. *Consistency Analysis.* We appreciate the information provided to staff regarding the total amount of STR Permit applications (233) as of April 13, 2021 that have been approved (178) and that are pending (55) pursuant to the newly enacted STR Permit Program. As stated in your April 7, 2021 letter, this total number of STR permit applications has limitations and “the amount of applications may increase as travel restrictions due to COVID-19 relax, summer approaches, and more of the 488 homes that were destroyed by the Woolsey Fire are rebuilt”. Furthermore, the letter notes that the STR permit applications do not represent the exact number of STRs operating in the City because only one STR permit is required for each parcel regardless of the number of STRS on each parcel. Additionally, in several of the City Council agenda reports for LCP Amendment No. 19-003 and the STR ordinance, Host Compliance cited the total of STRs in and near Malibu to be much higher than the total amount of STRs permit applications submitted pursuant to the newly enacted STR Permit Program. According to Host Compliance, there were 438 properties advertised for short-term rental as of October 2, 2020, 452 as of August 2, 2020, 446 as of July 2, 2020, and as high as 945 as of June 22, 2018. Therefore, in order to gain a better understanding of STRs historically operating in the City, please provide an estimated total or approximate range (based on the best available information) of STRs that were operating in the City prior to the effectiveness of the September 29, 2020 adopted STR Permit Program and prior to the COVID-19 travel restrictions, including an explanation of source of data and any limitations/assumptions associated with the data.
- b. Thank you for providing Commission staff with the estimated amount of multi-family dwelling units in the City. Regarding single-family residences, the STR Ordinance City Council agenda report dated June 28, 2018 states that the Department of Finance estimates there were 5,373 single-family homes as of January 1, 2017 within the City of Malibu. Can you please confirm if those numbers have been recently updated?

Thank you for your time and attention to this matter. Once we receive the noted information, we can analyze the proposed LCP amendment and schedule the matter for hearing. Should you have any

questions regarding the filing status and review of the proposed amendment, please do not hesitate to contact me at denise.venegas@coastal.ca.gov. We look forward to receiving the requested materials and moving forward with our review of this amendment application at your earliest convenience.

Sincerely,

DocuSigned by:

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Denise Venegas
Coastal Program Analyst