

CALIFORNIA COASTAL COMMISSION

CENTRAL COAST DISTRICT
725 FRONT STREET, SUITE 300
SANTA CRUZ, CA 95060
PHONE: (831) 427-4863
WEB: WWW.COASTAL.CA.GOV



W15a

Prepared August 11, 2025 for August 13, 2025 Hearing

To: Commissioners and Interested Persons

From: Kevin Kahn, Central Coast District Manager
Katie Butler, Central Coast District Supervisor

**Subject: Additional hearing materials for W15a
Monterey County LCP Amendment Number LCP-3-MCO-24-0039-1
(Vacation Rentals)**

This package includes additional materials related to the above-referenced hearing item as follows:

Additional correspondence received in the time since the staff report was distributed



SHAUN M. MURPHY, Esq.
PARTNER
ADMITTED IN CA, MI, TX, NY
AND THE U.S. SUPREME COURT

REPLY TO:
74774 HWY 111
INDIAN WELLS, CALIFORNIA 92210
T (760) 322-2275
MURPHY@SBEMP.COM

f

August 8, 2025

VIA ELECTRONIC MAIL (EXECUTIVESTAFF@COASTAL.CA.GOV)

California Coastal Commission
Central Coast District
725 Front Street, Suite 300
Santa Cruz, CA 95060

RE: Agenda Item W15a - Monterey County LCP Amendment No. LCP-3-MCO-24-0039-1 (Vacation Rentals): Opposition to Recommendation of Staff Report

Dear Commissioners:

The Monterey County Vacation Rental Alliance (“MCVRA”) is a diverse coalition of middle-class homeowners, property managers, and small business owners throughout Monterey County who share the Coastal Commission's commitment to protecting public access to the California coast for all. MCVRA's members are vacation rental owners and operators of all ages and economic levels who form the backbone of Monterey County's visitor economy. They share a love of the California coast and want others to experience the beauty of the coast. Their short-term rentals (“STRs”) provide critical, affordable access to California's coast for families, travelers, and temporary workers from all income levels.

MCVRA **vigorously opposes** the staff report's recommendation to approve this proposal. The proposed LCP amendment is not a “balanced approach” to STR regulation; it is a deliberate scheme to suppress coastal access masquerading as compromise. The County's own permitting platform exposes the deception: as of August 2025, only 47 vacation rentals have received permits to continue operating, with 64 applications pending, out of over 1,000 existing listings, eliminating over 90% of current coastal accommodations.

The staff report asks the Commission to accept that removing 80% of coastal visitor capacity will somehow maintain coastal access. The staff report asks the Commission to ignore decades of Commission precedent, comprehensive environmental analysis, and binding case law.

SLOVAK BARON EMPEY MURPHY & PINKNEY LLP

Palm Springs, CA
T (760) 322-2275

Indian Wells, CA
T (760) 322- 9240

Costa Mesa, CA
T (714) 435-9592

San Diego, CA
T (619) 501-4540

Princeton, NJ
T (609) 955-3393

New York, NY
T (212) 829-4399

www.sbemp.com

MCVRA urges the Commission to reject the staff report's recommendation and uphold the Commission's legal mandate instead. This proposed amendment violates the Coastal Act's core mandate to maximize public access.¹

First, STRs are the proven backbone of coastal access that the Commission has consistently championed for decades. The Commission has repeatedly recognized that STRs “provide a service to coastal visitors looking for a different, and often more affordable, type of overnight accommodations than traditional hotels” and serve as essential visitor-serving facilities for families seeking coastal access.

Second, the proposed amendment eliminates the backbone of Monterey Peninsula coastal access by eliminating 80% of visitor accommodation capacity. STRs serve 31,880 annual visitors who cannot be accommodated by hotels, with 41% qualifying as Lower-Cost Coastal Accommodations at \$56 per person versus hotels' \$122 per person.

Third, the proposed amendment constitutes an unprecedented reversal of precedent without justification, while ignoring environmental harm. The Coastal Commission declared individual CDPs “not warranted” in January 2024 but now demands \$12,000 permits. It also completely ignores Ramboll analysis showing 294% increased emissions from visitor displacement.

Fourth, if outright rejection is impossible, some modifications are warranted: remove the CDP requirement, remove the bans on STRs in Big Sur and Carmel Highlands, grandfather existing STRs, and raise the 4% cap.

Courts have long noted that “statewide interests are not always well represented at the local level” (*City of Chula Vista v. Superior Court* (1982) 133 Cal.App.3d 472, 488) and that “conflicting demands made upon the use and enjoyment of the California shoreline has proven to be beyond the capabilities of local governmental agencies.” (*CEEED v. California Coastal Zone Conservation Com.* (1974) 43 Cal.App.3d 306, 322.) In regard to this conflict, fifty years ago, the Legislature created the Coastal Commission to be the guardian of coastal access for all Californians.

MCVRA asks the Commission to honor that trust. The Commission faces a choice between supporting the rule of law or the rule of influence, between access and exclusion, between constitutional rights and an extrajudicial scheme. MCVRA respectfully but urgently demands that the Commission reject the staff report's recommendation and

¹ “The goals of the California Coastal Act of 1976 (Pub. Resources Code, § 30000 et seq.; Coastal Act) include ‘[m]aximiz[ing] public access to the beach ([Pub. Resources Code,] § 30001.5, subd. (c)) and protecting ‘[l]ower cost visitor and recreational facilities’ ([*id.*] § 30213; see § 31411, subd. (d)) [‘A lack of affordable accommodations remains a barrier to coastal access’]; *Greenfield v. Mandalay Shores Community Assn.* (2018) 21 Cal.App.5th 896, 899–900.)” (*Kracke v. City of Santa Barbara* (2021) 63 Cal.App.5th 1089, 1092.)

institute modifications that preserve meaningful coastal access while addressing legitimate community concerns through actual regulation rather than systematic elimination.

I. The Coastal Act mandates maximum public access, and the Commission has consistently championed and protected STRs as essential coastal infrastructure.

The Coastal Act establishes an unambiguous mandate: “maximize public access to and along the coast and maximize public recreational opportunities in the coastal zone.” (Public Resources Code § 30001.5 subd. (c).) That word “maximize” is not a suggestion; its legal weight has guided Commission decision-making for five decades. The Legislature further declared that lower-cost visitor accommodations are “essential elements of coastal and park access” and directed the Commission to “improve the availability of lower cost accommodations along the coast, particularly for low-income and middle-income families.” (Public Resources Code § 31411 subds. (c), (e).)

For many years, the Commission has consistently championed STRs as essential infrastructure for coastal access:

November 17, 1997, Charles Lester, Central Coast District Director: “We continue to support allowing short-term vacation rentals within private residences as an important source of visitor accommodations in the coastal zone. These rentals can also offer lower-cost overnight opportunities, especially for larger families and groups.”

June 23, 2016, Susan Craig, Central Coast District Manager: “Thus, from our perspective, we continue to support allowing short-term vacation rentals within private residences as an important source of visitor accommodations in the coastal zone. These rentals can also offer lower-cost overnight opportunities, especially for larger families and groups... vacation rentals are allowable in Monterey County's coastal zone under the LCP.”

These and other statements are not ancient history. The Commission's consistent, expert judgment has been that STRs serve the Coastal Act's core purposes.

To this point, the Commission has specifically rejected “hosted-only” regimes as inadequate for coastal access. When Santa Barbara County proposed restricting most residential areas to hosted STRs only in 2018, the Commission denied the proposal, finding that it “would result in a loss of existing, lower-cost overnight accommodations.” The Commission at that time recognized that “hosted STRs generally do not provide the space and privacy desired by families and larger groups traveling together.” The Commission understood then what remains true today: families do not want to share homes with strangers, and hosted requirements effectively eliminate family coastal access.

The Commission has required meaningful unhosted rental opportunities at every turn. In San Diego (2022), the Commission demanded minimum 90-day annual hosting allowances, recognizing that shorter requirements were impractical. In Long Beach, the Commission required impact analysis to ensure restrictions would not hinder coastal access. Even where caps exist, the Commission has grandfathered existing STRs and maintained whole-home rental availability, understanding that different visitors have different accommodation needs.

When Oxnard proposed a 5% cap on unhosted STRs in 2020, the Commission rejected it as failing to “adequately protect STRs as a valuable visitor-serving accommodation.” That 5% cap was deemed too restrictive to meet Coastal Act requirements. Yet today, the staff report endorses Monterey’s even more restrictive 4% cap on unhosted STRs as well as a ban in the entire Big Sur coastal zone.

The Commission’s commitment to STRs reflects the Coastal Act’s explicit balance between access and property rights. The Act requires regard for “constitutionally protected rights of private property owners” alongside maximizing access. (Public Resources Code § 30001.5 subd. (c).) This balance recognizes that coastal access depends on private property owners voluntarily providing visitor accommodations. If the Coastal Commission eliminates the economic incentive for coastal property owners to serve visitors, the Commission moves to eliminate the foundation of coastal access itself.

The Commission also has long understood that STRs serve visitor populations that hotels cannot and will not serve. STRs “provide a service to coastal visitors looking for a different, and often more affordable, type of overnight accommodations than traditional hotels can provide.” They offer “rooms for gatherings, multiple sleeping accommodations for larger families and groups, full kitchens, and laundry facilities” that enable visitors to “experience living in a community like a ‘local.’” (San Diego LCP Analysis, 2022.) Hotels cannot replicate this experience or affordability.

The Commission’s historical analysis demonstrates a deep understanding of the benefits of STRs that today’s proposed amendment abandons without explanation. The Commission has consistently recognized that restricting STRs would contradict the Coastal Act’s fundamental purposes. Yet the staff report now recommends approving restrictions far more severe than those the Commission has previously rejected: an unexplained and unsupported reversal of law and precedent that demands an explanation that the staff report refuses to provide.

II. On the Monterey Peninsula, STRs provide 80% of coastal accommodations while hotels abandon affordability.

On the Monterey Peninsula, STRs have become the foundation of coastal access while hotels systematically abandon affordability, leaving working families entirely dependent on STRs if they desire to visit the coast. The proposal’s actual impact contradicts its characterization as balanced regulation: County permitting data shows only

47 approved permits and 64 pending applications out of over 1,000 existing STRs, eliminating over 90% of current coastal accommodations.

STRs provide 80% of all coastal accommodation capacity in Monterey County. The comprehensive Ceto Consulting analysis submitted by MCVRA documents that STRs offer 18,057 total rooms with nightly visitor capacity of 43,502 people, compared to hotels' 8,809 rooms accommodating just 22,903 people. (Ceto Report at 2.) If the Commission chooses to reduce STR capacity as proposed, it will, quite simply, eliminate coastal access for working families.

The accommodation shortage is severe and worsening. Ceto's analysis reveals excess demand of 31,880 annual visitors who cannot be accommodated by existing hotels. Coastal hotel occupancy approaches 90% during peak periods, with weekend demand consistently exceeding supply throughout the year. (Ceto Report at 24-25.) This massive accommodation gap, equivalent to displacing the entire population of a small city, currently depends entirely on STRs. The proposed amendment's staff report provides no mitigation for the loss in overnight accommodations; it assumes that working families will not visit at all.

STRs are the only affordable coastal accommodations remaining. Using the California Coastal Conservancy's official definition of Lower-Cost Coastal Accommodations, lodging priced at 75% or less of statewide average daily rates, 41% of STRs qualify as affordable at \$56 per person or less. (Ceto Report at 36.) In stark contrast, hotels average \$132 per guest per night, well above the affordability threshold, making STRs the primary source of affordable coastal accommodations in the County. (Ceto Report at 31.)

The affordability gap extends far beyond nightly rates, a fact the staff report fails to consider. STR kitchens provide transformative cost savings that often determine whether coastal access is feasible for middle-class families. Using U.S. General Services Administration meal rates, families save \$212-267 daily by cooking in STR kitchens rather than dining out during hotel stays. (Ceto Report at 40.) These savings can represent the difference between coastal access being possible or impossible.

Meanwhile, hotels are systematically abandoning affordability precisely as STRs face elimination, again, a fact the staff report fails to consider. Since 2019, Monterey County has lost 6% of its economy hotel rooms while gaining significant capacity in luxury segments. (Ceto Report at 3.) The data shows a deliberate market shift: 44% of hotel rooms now fall into "Luxury" or "Upper Upscale" categories, while only 29% remain classified as "Economy." (Ceto Report at 25.) This movement toward upscale accommodations comes as STRs face systematic elimination. As noted in a recent Wall Street Journal analysis of New York's similar restrictions, when cities eliminate short-term rentals, "hotel prices soared to more than \$500 a night" while "everyone loses—except the hotel industry, which gets to charge dramatically higher prices." (Michael Salinger and Jon Leibowitz, "Why a Hotel Room in New York Costs \$500 a Night," Wall Street Journal,

July 25, 2025, https://www.wsj.com/opinion/why-a-hotel-room-in-new-york-costs-500-a-night-a6b998ad?mod=Searchresults_pos3&page=1.)

Big Sur exemplifies the affordability gap. Along the entirety of its more than 60 miles of coastline, Big Sur offers only 15 economy hotel rooms. (Ceto Report at 40.) The excess demand for lower-income visitors in Big Sur alone reaches 271,383 annually. (Ceto Report at 41.) Eliminating Big Sur's STRs while hotels provide virtually no affordable options will ensure that this iconic destination becomes almost exclusively accessible to the wealthy.

The staff report also ignores the cumulative effects of the proposed amendment. STRs have been systematically eliminated on the Monterey Peninsula over time through a series of cascading municipal restrictions. The proposed County amendment represents the final piece of a coordinated exclusion strategy:

- **City of Monterey:** Total prohibition of all rentals under 30 days
- **Carmel-by-the-Sea:** Bans STRs in residential zones
- **Pacific Grove:** Eliminated 160 STRs via ballot measure, cutting availability by two-thirds

This proposed amendment completes the systematic closure of one of California's most iconic coastline to short-term visitors. Combined with municipal restrictions, the Monterey Peninsula will offer virtually no affordable accommodation options for working families, transforming coastal access from a public right into a privilege of wealth.

Visitors served by STRs represent California's demographic diversity. The Ceto analysis shows that visitors to coastal Monterey County closely mirror the state's demographic and income profile, with roughly half falling below the state median household income (\$67,521 in 2020). (Ceto Report at 2.) These are the families who should be able to count on the Commission's vigilance to enforce the Coastal Act – working Californians seeking affordable access to their own coastline.

Unhosted STRs account for 87% of total STR guest capacity and maintain significantly higher occupancy rates than hosted alternatives. (Ceto Report at 30.) The overwhelming majority of visitors seeking STR accommodations want whole-home rentals, not shared spaces with property owners. MCVRA's survey data confirms this reality: only one respondent indicated willingness to operate a hosted rental under the proposed restrictions. The proposed amendment's emphasis on hosted accommodations ignores market reality as well as visitor traditions and preferences.

III. This proposal contradicts established precedent without justification while ignoring environmental harm.

The recommended approval of the proposed amendment represents an arbitrary abandonment of decades of Commission precedent without explanation, new evidence, or legal authority. The same Coastal Commission staff who declared in January 2024 that

coastal development permits for STRs are “not warranted” now demand \$12,000 individual permits for identical uses. This is not an evolution; it is a revolution that no one can justify.

The turnabout on CDP requirements creates an unmanageable statewide precedent. The Commission has never required property-by-property coastal permits for STR operations where a certified Local Coastal Program exists. If approved, this requirement would create expectations for individual CDP review of every STR in every coastal jurisdiction, an administrative impossibility that would paralyze the Commission's operations while destroying coastal access through prohibitive costs and delays.

The staff report ignores binding legal precedent that directly contradicts its recommendation. The *Coastal Protection Alliance v. Airbnb* decision established that STRs are “residential use, not a change in use, and thus not a development” under the Coastal Act. The staff report never mentions this controlling authority. The Court of Appeal specifically noted that requiring CDPs would “undermine the Coastal Act's goal of maximizing public access to the coast.” The staff report recommends precisely the outcome that precedent prohibits.

The staff report applies contradictory standards to different jurisdictions based on non-legal considerations. When Oxnard proposed a 5% cap in 2020, the Commission rejected it as inadequate to “protect STRs as a valuable visitor-serving accommodation.” Today, the staff report endorses Monterey's more restrictive 4% cap without acknowledging this contradiction. The Coastal Act demands consistent application of law, not selective enforcement designed to achieve predetermined political outcomes.

The arbitrary reduction from 6% to 4% caps exemplifies the proposal's fundamental procedural violations. The Board of Supervisors originally established 6% after deliberation and analysis. The 4% cap appeared without warning in the Final EIR, with no new data, no public review, and no explanation for the reduction. This last-minute change violates basic due process requirements for reasoned decision-making and demonstrates that the County's process was driven by political opposition rather than evidence-based analysis.

The staff report's dismissal of the CETO analysis is also lacking. The staff report claims that “the rationale and evidence supporting the claim that 41% of the total vacation rentals meet the lower-cost threshold are not clear” and questions how STRs averaging \$81 per person can have 41% below the \$56 threshold. Mathematically, averages can easily exceed thresholds while substantial portions fall below them, particularly when expensive outliers skew the mean upward. The staff report similarly mischaracterizes the Lower-Cost Coastal Accommodation threshold as something “the report's authors developed on their own.” This is factually incorrect. The CETO analysis explicitly uses the California Coastal Conservancy's official definition of Lower-Cost Coastal Accommodations, established as lodging priced at 75% or less of the statewide average daily rate.

The staff report further dismisses STR affordability by claiming vacation rentals “are not homogenous” and vary in quality and amenities. This criticism applies equally to hotels, yet the Commission routinely categorizes hotels by cost and star ratings. The staff report's selective skepticism about accommodation comparisons appears only when data contradicts the predetermined conclusion. Hotels demonstrate identical variability in quality, amenities, and pricing, yet the Commission has never declared hotel affordability analysis impossible due to heterogeneity.

Most significantly, the staff report ignores the CETO analysis's comprehensive calculation of total vacation savings. STR kitchens provide \$212-267 daily savings for a family of four compared to hotel dining costs. For a typical coastal vacation, these savings often exceed the accommodation costs themselves, making the difference between coastal access being financially possible or impossible for working families. The staff report acknowledges these “unique mix of attributes” but refuses to quantify their impact on affordability.

Additionally, the staff report's affordable housing justification lacks an evidentiary foundation. Under Monterey County Code Section 7.120.040(U), STRs are already prohibited in duplex dwellings, condominiums, multiple-family dwellings, accessory dwelling units, junior accessory dwelling units, structures intended for temporary occupancy, and dwellings subject to recorded governmental restrictions including affordable housing covenants. STRs are permitted only in single-family homes, which average \$2.1 million in value and are predominantly second homes (73%).

The staff report's reliance on Dr. Wachsmuth's research compounds this analytical failure by misapplying urban housing studies to coastal luxury markets. The Commission's own staff report acknowledges that Dr. Wachsmuth's research “focused on exploring the relationship between STRs and housing stock in large urbanized metropolitan areas” and “does not appear to consider potentially significant distinctions between observed trends in those dense urban areas and trends that may be present in dissimilar built environments (such as more rural and sparsely developed Big Sur).” The staff report admits that “given the very different housing characteristics of Monterey County's coastal zone as compared to Los Angeles and other significant U.S. metropolitan areas, it is not clear that the data is transferable.” Most telling, Commission staff “reached out to Dr. Wachsmuth multiple times since his December 2023 presentation in order to try to better understand his research and its potential implications in the coastal zone, but to date Dr. Wachsmuth has not yet responded to these inquiries.” The Commission is being asked to eliminate coastal access based on research that its own expert cannot or will not defend when questioned about its applicability.

The staff report provides no evidence that multi-million dollar coastal properties would convert to affordable rentals rather than remain vacant if STR use were eliminated. Monterey County's housing affordability will not be improved by a removal of STR operations in the luxury coastal housing segment. Eliminating STRs will not create a

single unit of affordable housing but will eliminate the economic activity that supports local jobs and the tax revenue that could fund actual affordable housing programs.

The proposed amendment also violates the California Environmental Quality Act by ignoring comprehensive environmental analysis showing harm. The Ramboll environmental report shows that visitor displacement from STR restrictions would increase emissions by 294% and daily fuel consumption by 194%. Mobile source emissions would triple as visitors are forced to travel farther to distant accommodations. Hotels consume 137% more electricity and 51% more natural gas per person than STRs, generating 19% more greenhouse gas emissions per guest. (Ramboll Report at 5, 10-11.)

This displacement would force visitors into environmentally destructive alternatives: energy-intensive hotels that consume vastly more resources per guest, or distant STRs requiring dramatically increased vehicle miles traveled and associated emissions. Current STR operations require approximately 848 gallons of gasoline and 48 gallons of diesel daily. After implementing the proposed restrictions, daily fuel consumption would increase to 2,494 gallons of gasoline and 140 gallons of diesel, representing a 194% increase that directly contradicts California's climate commitments. (Ramboll Report at 11.)

The staff report provides zero response to these environmental findings. Public Resources Code Section 21080.5, subdivision (d)(2)(D) requires agencies with certified regulatory programs to provide "EIR-equivalent" environmental information disclosure, including written responses to significant environmental points raised in public comments on proposed Commission actions. The staff report's failure to offer responses on the adverse environmental effects of the proposed amendment violates the California Environmental Quality Act.

The environmental justice impacts are also completely ignored by the staff report. Displaced visitors will concentrate in communities already ranking in the 80th percentile and above for cumulative environmental burden along the Monterey/Seaside-Salinas corridor. Census Tract 6053013100 ranks in the 80th percentile for elevated traffic impacts, while other tracts show high rankings for diesel particulate matter exposure. (Ramboll Report at 6-7.) Rather than dispersing visitors throughout existing housing stock in various neighborhoods, the proposal channels displaced visitors into concentrated hotel zones and high-traffic corridors that pass through disadvantaged communities, forcing overburdened populations to absorb additional environmental impacts.

The elimination of existing STR capacity would inevitably drive new hotel construction to meet persistent visitor demand, creating substantial additional environmental impacts the County has failed to analyze. The Ramboll Report's screening health risk assessment for a typical 250-room hotel construction project found an excess cancer risk of 27 in a million for the maximum exposed individual—nearly three times the Monterey Bay Air Resources District's threshold of 10 in a million. (Ramboll Report at 15.)

The staff report acknowledges that “unhosted STRs account for 90% of total coastal STR guest capacity and have higher occupancy rates” and then recommends essentially eliminating them. The staff report states that the Commercial Vacation Rental bans in Big Sur and Carmel Highlands “would decrease public recreational access opportunities in these prime visitor destinations” and then endorses these bans anyway. The staff report concedes that “it is not clear that homes that are being used for unhosted rentals will instead be used for longer-term housing” in these high-priced areas and then claims housing benefits justify access elimination. The staff report acknowledges that “hosted STRs generally do not provide the space and privacy desired by families” and then recommends forcing families into this inadequate accommodation model.

When the Commission’s own analysis contradicts its recommendations at every turn, the recommendations lack the reasoned basis that the Coastal Act requires. The proposed amendment before the Commission represents a serious departure from evidence-based decision-making.

IV. Four specific changes can help to protect coastal access.

The Commission faces a choice: reject this elimination scheme entirely or propose specific modifications that preserve meaningful coastal access. While MCVRA maintains that outright rejection best serves the Coastal Act’s mandates, if the Commission cannot reject this proposed amendment, four modifications represent the minimum necessary to preserve necessary coastal access.

Remove the unprecedented CDP requirement for individual STRs. This represents the first such requirement in Commission history and creates unmanageable precedent that cannot be replicated across coastal jurisdictions. The \$12,000 cost alone eliminates most middle-class property owners from participation. More fundamentally, the *Coastal Protection Alliance* decision definitively established that STRs are residential use, not development requiring discretionary permits. The Commission cannot approve requirements that contradict binding legal precedent. The Commission’s own January 2024 declaration that CDPs are “not warranted” for STRs confirms this legal reality.

Remove the ban on STRs in Big Sur and Carmel Highlands. Banning STRs in these affluent areas precludes access precisely where people need it most. The Commission should not protect certain residents at the expense of broader public access. The Commission rejected a less strict LCP amendment in Santa Barbara County in 2018 that would have allowed STRs in only one overlay residential zone, recognizing that such restrictions were too severe. Policy 5.4.3.C.11 for Big Sur explicitly states: “Conversion of existing low cost overnight accommodations to other uses, unless replaced with comparable facilities, will not be permitted.” The proposal directly violates this policy by eliminating every STR in these areas.

Grandfather existing STRs. This approach has been successfully implemented across the state including in Del Mar, Dana Point, and Laguna Beach, among others. Grandfathering reduces the Commission’s legal exposure while addressing coastal

access concerns. It recognizes that existing STRs represent established visitor-serving facilities that contribute to coastal access and should be protected rather than eliminated.

Raise the 4% cap. The Commission previously denied an LCP amendment in Oxnard in 2020 that capped unhosted STRs at 5%, finding that it would not “adequately protect STRs as a valuable visitor-serving accommodation.” Monterey County’s 4% cap is even more restrictive than the proposal the Commission already rejected as inadequate. The County originally recommended a 6% cap and then reduced it with no explanation or evidence. This arbitrary reduction lacks rational foundation and falls below the Commission's own established threshold for adequate STR protection.

Make no mistake: even with these changes, the proposed amendment would still restrict coastal access far more severely than any LCP amendment the Commission has previously approved. The Legislature created this Commission to ensure that California's coastline remains accessible to every resident, regardless of economic status. For decades, the Commission has been the guardian of coastal access for all Californians.

This proposed amendment asks the Commission to abandon that trust. It asks the Commission to approve the systematic exclusion of working families from the coast. It asks the Commission to ignore binding legal precedent, constitutional requirements, and comprehensive environmental analysis. It asks the Commission to believe that eliminating 80% of accommodation capacity will somehow maintain coastal access.

MCVRA respectfully but urgently demands that the Commission reject the staff report's recommendation and fulfill its legal mandate instead. Californians deserve nothing less.

Sincerely,

SBEMP LLP

A handwritten signature in blue ink that reads "Shaun M. Murphy". The signature is written in a cursive, flowing style.

BY: Shaun M. Murphy

SMM: DY

c: Katie Butler (Katie.Butler@coastal.ca.gov)
Kevin Kahn (kevin.kahn@coastal.ca.gov)



PEBBLE BEACH
COMPANY

August 8, 2025

California Coastal Commission
Central Coast District
725 Front Street, Suite 300 Santa Cruz, CA 95060

RE: W-15a Monterey County LCP Amendment No. LCP-3-MCO-24-0039-1 (Vacation Rentals)

Dear Chair Harmon and Commissioners,

Pebble Beach Company (“PBC”) respectfully asks the Commission not to certify Monterey County’s proposed amendment to its Local Coastal Program Implementation plan (the “Amendment”). PBC has repeatedly and consistently opposed commercial vacation rentals and unlimited vacation rentals of any kind in Del Monte Forest. As early as 1997, PBC wrote to protest the issuance of vacation rental permits in Del Monte Forest as a violation of Del Monte Forest CC&Rs, and beginning in 2016, PBC became actively involved with Monterey County staff, participated in various County-organized meetings and provided input on virtually every version of the vacation rental ordinances considered by Monterey County. An example of the many communications from PBC to Monterey County on this topic can be found at [Attachment 1](#) to this letter. The final ordinance incorporates none of the requests made by PBC to protect the residents and resources of Del Monte Forest.

Del Monte Forest is a special place, renowned for its natural beauty and wildlife (including critical Monterey Pine habitat), peaceful residential neighborhoods, and its championship golf courses and world-class hotels. The Commission long ago recognized the need to create balance between each of these critically important yet sometimes competing interests. As the staff report observes, this balance is complex and complicated. This is why so much careful attention was given by the Commission when drafting the two land use plans that bisect Del Monte Forest (the Del Monte Forest Land Use Plan and the Greater Monterey Peninsula Land Use Plan) (collectively, the “LUPs”).

Pebble Beach Company partnered with the Commission during these negotiations, since Del Monte Forest is located in an unincorporated area of Monterey County and LUPs effectively function as the general plan for the “city” known by many as Pebble Beach. Both LUPs entrust PBC with protecting the delicate balance of conservation, visitor-serving, and residential uses within Del Monte Forest.

The proposed Amendment destroys this delicate balance and obstructs PBC's efforts to carry out its obligations under the applicable land use plans by allowing every single home in Del Monte Forest to become a vacation rental. The staff report observes that the County found that a cap of 4% on commercial vacation rentals in Del Monte Forest—along with unlimited Homestays—would ensure that coastal resource overuse would be limited. PBC has consistently argued that even a 4% cap (not to mention an unlimited number of Homestays) upsets the negotiated balance established by the LUPs, since the reality is that 4% of the residential housing in Del Monte Forest is the equivalent of 121 additional mini-hotels, taking 121 homes out of the residential housing market in an area that needs more housing, not less.

Even a cursory glance at the map of approved and pending commercial vacation rentals and Homestays maintained by Monterey County as shown at [Attachment 2](#) shows that Del Monte Forest is bearing nearly the entire burden of the 4% cap intended to apply to the large portion of the County covered by the Greater Monterey Peninsula LUP. Adding to this burden is the fact that as written, the vacation rental ordinance also allows every other home in the Forest to be operated as a "Homestay", which ostensibly requires the residence to be the primary residence of the applicant. The fact that Monterey County has knowingly allowed a single applicant to file for a Homestay permit for three separate residences in Del Monte Forest raises a question about the County's willingness or ability to enforce Homestay requirements.

Moreover, the concentration of Commercial Vacation Rentals and Homestays in one small section of Del Monte Forest absolutely does not ensure that "the residential community [in Del Monte Forest] is not significantly disrupted." Judging by the number and nature of complaints received by PBC from its residents about the noise and traffic issues surrounding many of these rentals, it would appear that many of these high-priced rentals are instead being used as weekend party houses rather than providing affordable coastal access opportunities for the public.

Please note that PBC owns all roads inside the gates of Del Monte Forest, and as such, has the right to control access to those roads, subject to certain public access requirements that would not apply to commercial use of residential property. Del Monte Forest residents are granted right of access to their single-family residence on these privately owned roads subject to the payment of an annual road fee (which in many cases is only \$25 per year). Since commercial use of the property is specifically prohibited, the access agreement does not cover access for that purpose.

Additionally, PBC expends significant resources maintaining and operating its privately owned roads for the benefit of Del Monte Forest residents and the visiting public. The Monterey County vacation rental ordinance fundamentally changes the character of Del Monte Forest residential neighborhoods and the use and impact on PBC's privately owned and maintained roads without any kind of environmental study or actual assessment of the impact of potentially hundreds of mini-hotels.

For these reasons, and as part of its efforts to maintain the balance contemplated by the land use plans, PBC notified Monterey County on October 9, 2024, of its intent to deny every application

for the operation of commercial vacation rentals in Del Monte Forest under its power to deny access to and use of its roads for the purpose of accessing such rentals (see Attachment 3). Despite this notification, Monterey County has continued to accept vacation rental application and the related, non-refundable fees from applicants without informing them that PBC will not consent to use of its roads for this purpose. PBC is requesting assistance with the application process established by the County on behalf of these frustrated applicants.

Again, PBC believes proposed Amendment, as applied to Del Monte Forest, will cause irreparable damage to the critical balance put into place by the applicable land use plans to protect this precious place, and respectfully requests the Commission not to certify the Amendment. In the alternative, Monterey County has indicated that it plans to reconsider its vacation rental ordinance in December. If the Commission is unwilling to refuse certification outright at this time, PBC asks the Commission to delay a ruling on this matter until the County makes its final determination on the ordinance to prevent the necessity for another hearing on the same ordinance early next year.

Sincerely,

PEBBLE BEACH COMPANY

A handwritten signature in cursive script that reads "Diane Goldman".

Diane Goldman
General Counsel

Attachments

Cc: Katie Butler (Katie.Butler@coastal.ca.gov)
Pat Hovakimian, CLO, Pebble Beach Company
Kevin Kahn (kevin.kahn@coastal.ca.gov)
David Stivers, President & CEO, Pebble Beach Company

August 26, 2024

VIA EMAIL

County of Monterey
Board of Supervisors
168 W. Alisal St., 1st Fl.
Salinas, California 93901
Attn: Valerie Ralph, Clerk of the Board;
Chair Supervisor Glenn Church; Vice Chair
Supervisor Chris Lopez; Supervisor Wendy
Root Askew; Supervisor Mary L. Adams;
Supervisor Luis A. Alejo
Email: cob@countyofmonterey.gov;
district2@countyofmonterey.gov;
district3@countyofmonterey.gov;
lopezcm@countyofmonterey.gov;
district4@countyofmonterey.gov;
district5@countyofmonterey.gov;
district1@countyofmonterey.gov;

Re: Proposed Monterey County Vacation Rental Ordinances

Members of the Board of Supervisors:

We write on behalf of our client, Pebble Beach Company, with respect to the ordinances proposed by the County of Monterey to regulate various types of short term rentals (“STR”). Over the last few years, Pebble Beach Company has been following the evolution and various iterations of the County’s proposed vacation rental regulations. The most recent changes to these proposed regulations are highly concerning as they threaten the unique character of the Del Monte Forest (“DMF”), are in conflict with the Land Use and Housing Elements of the County’s General Plan, and have not been environmentally assessed in the Environmental Impact Report (“EIR”) prepared for the County’s STR regulations. For these reasons and as further detailed below, Pebble Beach Company (“PBC”) strongly urges the Board of Supervisors to not certify the EIR prepared for the Vacation Rental Ordinances Project (“Project”) and not adopt the proposed STR regulations / ordinances. Instead, the Board of Supervisors should refer the EIR and STR regulations back to County staff for necessary revisions and further environmental analysis.

A. Executive Summary

As an initial matter, the STR regulations undercut the long standing and successful public-private partnership established between the County and PBC. The proposed STR regulations undermine that partnership by removing the commonsense legal requirement that owners obtain PBC's consent (pursuant to the requirements set forth in the covenants in their deed) before renting out their home as a short term vacation rental. The County should continue to refer applicants to PBC before issuing any STR license or permit, and PBC will assist with the evaluation and processing of the STR permit application, thereby relieving the County's already overstretched staff.

In addition, this comment letter contains the following key points:

1. The EIR prepared for the STR regulations fails to comply with the California Environmental Quality Act ("CEQA") because the environmental impacts of Homestay vacation rentals were not properly analyzed in the EIR and the allowance for this new class of STR represents a material change to the EIR's project description. As such, the methodology relied upon for the analysis of air quality, energy, greenhouse gases, noise, population and housing, and transportation is flawed and relies upon faulty assumptions.
2. The definition of a "Homestay" contained in the STR regulations is inherently incongruous and misleading as it provides an open pathway for the commercialization of virtually all single family homes in the County.
3. The County will be incapable of enforcing the STR regulations, thus causing communities throughout the County to deal with the public nuisances and health and safety issues that result from the proliferation of short term rentals. In the Del Monte Forest, Pebble Beach Company security personnel and other employees will be placed directly in harm's way by these proposed STR regulations.
4. The STR regulations are in conflict with various policies in the County's General Plan Land Use and Housing Elements, and is contrary to the objectives, goals and policies in the Del Monte Forest Land Use Plan ("LUP"). The STR regulations will harm working families in Monterey County and exacerbate the affordable housing crisis by further limiting the already short supply of affordable long term housing for Monterey County residents in favor of short term rentals for vacationers.

5. The STR regulations are inherently inconsistent with Monterey County Code (“MCC”) Chapter 16.80, which requires persons seeking permits from the County under MCC Titles 20 and 21 for projects relying upon private roads for access to obtain permission from the owner of the private road.

6. The Del Monte Forest is a unique and environmentally sensitive community within the County and deserves to receive exemptions from the County’s STR regulations like those that are proposed for residential areas in Big Sur and portions of Carmel.

Chapter 3 of the Draft EIR, dated December 2023, identified many community concerns regarding the potential impacts of all types (environmental, social, economic) associated with vacation rentals and indicated that the STR regulations the County was developing attempted to address many of these concerns. The vacation rental regulations analyzed in the Draft EIR provided for two types of Vacation Rentals: Commercial Vacation Rentals (“CVRs”) and Limited Vacation Rentals (“LVRs”). The draft regulations generally placed a cap on CVRs at 6 percent of single family residences within each land use planning area (except the Big Sur Coast land use plan area and low-density residential districts within the Carmel land use plan area where they would be banned), and limited LVRs to three times in a twelve month period with each rental limited to fourteen days.

However, the currently proposed STR regulations have introduced a new type of Vacation Rental designated as a “Homestay” that is permitted in basically every single family residence within the unincorporated areas of the County and allows them to be rented out every night of the year, subject to certain ownership and hosting requirements that will be extremely difficult for the County to effectively enforce. As detailed below, the County’s definition of a “Homestay” is highly problematic as it allows for non-resident property owners to contract with third party operators to manage rentals and operations on their behalf, thus commercializing the use of the home. Accordingly, the introduction of Homestays threaten to unleash all of the negative effects of Vacation Rentals identified in Chapter 3 of the Draft EIR that the County claimed it was attempting to address with the regulations proposed at that time. The Homestay rental concept directly conflicts with various land use policies and objectives of the County’s General Plan by encouraging the unfettered proliferation of short term rentals that have proven to cause nuisances and disrupt neighborhoods in other cities and jurisdictions.

In addition, the allowance for Homestay vacation rentals and other short term rentals proposed by the STR regulations threaten the availability of single family residences for long term housing opportunities for working families in Monterey County. In the Draft EIR and

documentation included in the Board's August 27, 2024 agenda packet, the County claims that Homestays will help families supplement their incomes which will help them afford to pay for their housing. (Draft EIR, Section 6.4.2, p. 6-8, Attachment G, p. 9) This claim is baseless and ignores the definitional and enforcement problems inherent in the concept of a Homestay. Moreover, the County has failed to provide any economic analysis as to the tipping point when it is more economically beneficial for an owner of a single family residence to operate it as a short term rental rather than lease it as a long term rental. And, in fact the Draft EIR acknowledges that there is a correlation between the introduction of short term rentals and the loss of long term rentals and a corresponding increase in long term rents. (Draft EIR, p. 3-9) Accordingly, the allowance for short term rentals represents a serious threat to the availability of single family residences as long term rentals. This conflicts with the County's Housing Element policies which seek to encourage the conservation of existing housing stock and ensure that the County's regulations and ordinances do not impede the production and maintenance of housing. The allowance for vacation rentals will discourage the conservation of single family residences for long term housing rentals and will create an economic incentive to convert such long term rentals to short term rentals. In short, these draft regulations harm working families in Monterey County by further exacerbating the affordable housing crisis.

The various problems with the County's proposed adoption of the STR regulations are explained below. Primarily, the environmental impacts associated with the introduction of Homestay vacation rentals were not analyzed in compliance with CEQA in the Draft EIR prepared for the County's STR regulations.

B. Material Changes to the Proposed Vacation Rentals Regulations Have Been Made Which have not Been Properly Assessed

The County's proposed regulations of short term vacation rentals have significantly changed since the Draft EIR was first published and distributed to the public for comment in December 2023 and as a result, the public has been deprived of a meaningful opportunity to provide feedback. Moreover, the various changes made to the STR regulations over the last few years have presented a confusing record that have made it difficult for the public to understand.

The most recent changes to the proposed STR ordinances were only provided to the public for review on August 22, 2024, a mere three business days prior to the Board's proposed action. The revised set of ordinances (contained in Attachments C, D and E to the Staff Report for the Board's meeting on August 27, 2024 (the "August 2024 Ordinances")), constitute the third iteration of the County's proposed STR regulations. The first set, dated January 6, 2022, were Attachments 1, 2 and 3 to the Draft EIR (the "January 2022 Ordinances"). The second set,

dated May 16, 2024, were contained in Appendix B to the Final EIR (the “May 2024 Ordinances”).

The May 2024 Ordinances and August 2024 Ordinances contain several material changes to the version of the January 2022 Ordinances which were environmentally assessed in the Draft EIR, as described below.

(A) The January 2022 Ordinances permitted Limited Vacation Rentals in any planning area but limited the number of stays to a total of three per 12-month period with each stay lasting for no more than 14 days. However, the May 2024 Ordinances significantly changed the definition of a LVR by allowing for an unlimited number of stays per 12 month period for Vacation Rentals that were “Hosted”. (Appendix B to Final EIR, MCC, section 7.120.020(L)). The May 2024 Ordinances added this new concept of a “Hosted” rental and defined it as a Vacation Rental in which the Operator occupies at least one Bedroom within the Vacation Rental while it is being rented as a Vacation Rental.

(B) The August 2024 Ordinances further changed the definition of LVR back to its definition in the January 2022 Ordinances, but added a whole new category of Vacation Rental called a “Homestay” rental, which is defined as “a Vacation Rental in which the Owner or principal resident occupies at least one Bedroom within the Vacation Rental while it is being rented as a Vacation Rental. The Vacation Rental must be the Owner’s Primary Residence” (emphasis added), and to qualify as the Owner’s Primary Residence, the property must “lived in by the Owner for at least 183 days...as documented by at least two of the following: motor vehicle registration, voter registration, homeowner’s exemption on their property taxes, or a utility bill.” These Homestay rentals are treated similar to LVRs in that there is no limit on the number of such rentals in any planning area and are permitted through a ministerial licensing process, however, unlike LVRs, Homestay rentals may be rented out an unlimited number of days per year. (See definitions of “Homestay” and LVR, Attachment E, p. 5, Attachment F, p. 9) As such, the allowance for Homestay rentals within the County wholly undermines a primary intent of original January 2022 Ordinances, which was to ensure that the County would not be oversaturated with a large number of Vacation Rentals.

(C) Moreover, the August 2024 Ordinances provide no definition for what the term “principal resident” means with respect to Homestays. It could allow for an individual who is not the owner of the property to occupy a bedroom so that the remainder of the property could be rented out for an unlimited number nights per year. A “principal resident” could be contracted by the actual property owner, for instance, to manage

and oversee the rental of the home. Further, the County will have no way of knowing whether a residence is actually lived in by an Owner for the requisite 183 day period; merely reviewing documentation evidencing that an Owner holds fee title to the property cannot constitute proof of actual occupancy by the Owner. **Thus, the definitional incongruities with the term “Homestay” in the proposed STR regulations provide a direct avenue for the commercialization of housing and for Vacation Rentals to proliferate throughout the County.**

(D) The August 2024 Ordinances were also amended to increase the permitted daytime occupancies of both LVRs and Homestays to up to 15 persons which matches the permitted daytime occupancies for CVRs. (Attachment E, p. 11)

As a result of these material changes, the County’s proposed STR ordinances would allow for a total of 1,432 single family residences within the DMF planning area to be used as Vacation Rentals with no cap on the number of rental days or stays. For the GMP planning area that number is 3,879 single family residences. (See revised Project Description to Draft EIR, Appendix C, Table 2-1, p. 2-10).

Accordingly, the Vacation Rental regulations have changed significantly from what was originally described in the Project Description analyzed in the Draft EIR and yet no effort has been made to augment the analysis in the Draft EIR to address the forty fold increase in number of allowed Vacation Rentals and the exponential increase in the number of allowed vacation rental days. As such, the EIR fails in its primary purpose, which is to inform the public agency decision makers, in this case the Board of Supervisors, and the public generally of the significant environmental effects of the project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. (14 CCR 15121(a)). Furthermore, as explained in more detail below, the EIR prepared for the County’s Vacation Rental Ordinances Project does not reflect a good faith effort at full disclosure of the project’s potentially significant environmental impacts on Monterey County. (14 CCR 15151). In fact, because of its patent failure to analyze the environmental impacts that will result from the unlimited number and rental nights of Homestays, the EIR is fundamentally and basically inadequate and has precluded the opportunity for meaningful public comment. Accordingly, to comply with CEQA, the EIR’s analysis must be supplemented to analyze the potentially significant impacts associated with the addition of the Homestay vacation rental concept and recirculated for public comment. (14 CCR 15088.5).

Again, waiting until three business days before the Board of Supervisors meeting at which it is being asked to approve these STR regulations to release materially amended STR regulations creates confusion and precludes the public from meaningfully commenting on the

revised STR regulations. We urge the County to provide more time to the community and stakeholders to review these important documents and changes to the proposed STR ordinances, and not rush through an approval that the public has not had an opportunity to adequately review. At the very least, this item should be continued for at least thirty (30) days to provide the public sufficient time to digest the literally hundreds of pages of new material related to the STR regulations.

C. Violations of the California Environmental Quality Related to the Environmental Analysis

C.1 The EIR's Project Description is Inaccurate and Unstable

An accurate, stable, and finite project description is critical to providing the public and decision makers with an informative and legally sufficient EIR. *Washoe Meadows Community v Department of Parks & Recreation* (2017) 17 Cal. App. 5th 277, 287. CEQA requires the County to ensure that its decision makers and the public have enough information to “ascertain the project’s environmentally significant effects, assess ways of mitigating them, and consider project alternatives.” *Sierra Club v City of Orange* (2008) 163 Cal. App. 4th 523, 533. If the project changes in a meaningful way during the CEQA review or other stages in the approval process, the public must be given the opportunity to comment on the changes. *Save Our Capitol! v Department of Gen. Servs.* (2023) 87 Cal. App. 5th 655, 676.

As noted above, the material changes made to the County’s proposed STR regulations from what was analyzed in the Draft EIR constitute a fundamental alteration that requires additional environmental analysis. By adding the concept of Homestay vacation rentals and permitting every single family residence in the unincorporated areas of the County an unlimited number of Homestay rental nights per year, the County has meaningfully changed the Project in a manner that was not analyzed in the Draft EIR or the Final EIR.

The Draft EIR contains no analysis of the environmental impacts of Homestay rentals in its Chapter 4 entitled “Environmental Impacts and Mitigation Measures” or Chapter 5 entitled “Cumulative Impacts.” The Draft EIR almost exclusively focuses on the potential environmental impacts from CVRs. For instance, the first paragraph of 3.4 states, “The project includes regulations to permit only a limited number of vacation rentals to operate in each land use planning area in Monterey County . . .” Clearly, this discussion pertains to CVRs, not LVRs or Homestays. Furthermore, the Draft EIR in section 4.1.1, p. 4.1, states:

A limited vacation rental would be defined as a residential property rented as a vacation rental by the owner not more than three times in a 12-month period,

with each such rental not to exceed 14 days. ***Due to the very occasional use of the limited vacation rentals, the focus of the analysis in the EIR is on the commercial vacation rentals*** (emphasis added).

This statement is relevant to Homestay rentals because at the time of the release of the Draft EIR the ordinances limited LVRs to a total of three rentals per 12-month period with each stay limited to 14 days. It implies that if LVRs were allowed a greater number of rental nights per 12-month period, more analysis would have been required. As such, this supports our contention that Homestay rentals which are not limited with regard to number of rentals or the number of total rental days requires a robust analysis of the foreseeable environmental impacts from this newly allowed use.

Therefore, with the addition of Homestays in the August 2024 Ordinances, the Project Description is unstable and the public has not been provided a meaningful opportunity to comment on the environmental impacts of this material change.

C.2 The Draft EIR's Analysis of Environmental Impacts Related to Air Quality, Greenhouse Gases, Energy and Traffic is Fundamentally Flawed

Putting aside the fact that all of the environmental analysis is incomplete because it has failed to analyze the environmental impacts associated with the addition of Homestay rentals, the qualitative approach to analyzing the environmental impacts related to air quality, greenhouse gas emissions, energy and transportation is fundamentally incorrect. These sections state that the analysis of these impact topics depends significantly on obtaining reasonably reliable data regarding the number of vehicle trips generated by short term rentals and the length of those trips. Without this data, the Draft EIR states it is not possible to quantify the emissions or energy consumption necessary to make impact determinations. Typical of this discussion is the narrative in the section discussing operational air quality impacts which states:

Based on available data and information, it is not possible to accurately quantify changes to emissions related to the project. However, it is possible that vacation rental-related activity would increase as a result of implementing the project. It is assumed that most vacation rentals would function as temporary households and that permanent residential vehicular trips would be replaced by trips by guests staying at the properties. VMT may increase as a result of the project because renters travel from out of town to use the rentals. Some of the VMT increase may be offset because traditional residential use would include full time occupation of a home (and VMT would be generated daily) rather than on a

fractional basis associated with vacation rentals (with VMT generated only on those days when the units are rented). ***As discussed in Section 4.10 (Transportation), estimating VMT changes is speculative.*** (emphasis added) (Draft EIR, p. 4.4-15).

The Transportation analysis further discusses the alleged speculative nature of quantifying VMT generated by Vacation Rentals, stating that it is anticipated that trip generation from Vacation Rentals, in this case CVRs, would be less than the trip generation from a typical single family residence. (Draft EIR, Table 4.10-2, p. 4.10-10) However, this analysis fails to consider the fact that Homestay locations are supposed to be the Owner's primary residence so the trip generation from visitors staying at the Homestay would need to be added to the trip generation from a typical single family residence. With regard to trip lengths, the discussion states:

Thus, although daily trip generation associated with vacation rentals would likely be less intensive than that of the single-family detached housing it would replace, the uncertainty related to trip lengths associated with vacation rentals makes accurately quantifying the change in total VMT associated with implementation of the project too speculative. (Draft EIR, p. 4.10-10)

Yet, no explanation is provided as to why the Draft EIR relies upon the occupancy rates of hotels as a basis for determining the occupancy rates associated Vacation Rentals (65 percent) (Draft EIR, Section 4.1.1, p. 4-1) but the VMT analysis cannot utilize data related to the trip lengths associated with hotels in vacation destinations as a basis for calculating the VMT associated with Vacation Rentals.

The fundamental flaws in the approach to the analysis of VMT has affected the analysis of environmental impacts related to air quality, greenhouse gas emissions and energy, resulting in significant analytical defects.

C.3 The Draft EIR's Analysis of Environmental Impacts Related to Population and Housing is Incomplete

In this section of the Draft EIR, Impact Question 4.9-2 asks, "Would the project displace substantial number of existing people or homes, necessitating the construction or replacement of housing elsewhere?" Initially, the conclusion that any displacement caused by the Project would be less than significant fails to take into account Homestay rentals. Instead, the analysis relies upon the relatively small number of additional CVRs permitted by the STR regulations. Second, the analysis relies in part on a comparison between what the current County ordinance

August 26, 2024

Page 10

regulating STRs permits (i.e. “unlimited conversions) (Draft EIR, p. 4.9-6), versus the caps placed on the number of CVRs set forth in the STR regulations. However, under CEQA this is an improper methodology, which was rejected by the California Supreme Court in *Communities for a Better Environment v. South Coast Air Quality Management District* (2010) 48 Cal.4th 310. The proper methodology is to analyze the Project’s impacts on the existing physical environment. In this case, the existing environment is the County’s currently permitted vacation rentals.

We understand that the County may argue that allowing Homestay rentals in every single family residence in the unincorporated parts of the County will not cause displacement because a residence used as a Homestay must be the Owner’s primary residence and either the Owner or a “principal resident” must occupy one bedroom in the Homestay residence while it is rented. However, the tools the County proposes to verify that a Homestay residence is the Owner’s primary residence can be easily circumvented. Utility bills showing the Owners name and the address of the residence as the mailing address would not preclude the Owner from requesting to receive the utility bills via email. Furthermore, just because the Owner’s vehicle registration shows the residence’s address does not mean the vehicle is actually housed at the Homestay residence. Furthermore, the STR regulations fail to explain how the County intends to verify that an Owner or principal resident is occupying a bedroom while the Homestay is being rented. According to the documentation submitted by County staff for the August 27, 2024, Board meeting (Detailed Discussion, p. 15 (Attachment G)), the Housing and Community Development Department proposes to hire two Code Compliance Inspectors to assist with the enforcement of the STR regulations. A mere two Code Compliance Inspectors for the entire County is woefully inadequate to verify that the potentially thousands of Homestay rentals are operated in compliance with the STR regulations. And, regardless of how many new Inspectors hired by the County to ensure compliance, they would have no reasonable means of verifying that an Owner is actually living within the Homestay residence. Furthermore, as detailed in the articles attached to this letter, the cities of Los Angeles and San Diego have experienced significant difficulty in enforcing their STR regulations despite dedicating significant resources to their enforcement. In short, the STR regulations create a set of rules that are virtually unenforceable by the County.

In reality, within the Del Monte Forest, Pebble Beach Company employees will bear the brunt of dealing with the impacts of the County’s new STR regulations, which will put PBC employees in harm’s way by forcing PBC’s Security Department to deal with the impacts of vacationers’ use of STRs (such as late night parties, alcohol use, noise violations, parking issues such as the blocking of private roadways, etc.). The Sheriff’s office has already told PBC it does not have the resources to enforce the County’s existing STR violations effectively. The County’s

new STR regulations will only add to the problem by exponentially increasing the number of STRs in the Del Monte Forest and throughout the County.

Additionally, the County has failed to justify its claims that the STR regulations will not displace the existing housing stock available for long term rentals. The EIR contains no economic analysis as to the number of short term rental days at which it becomes economically beneficial to an Owner to convert a long term rental to a Homestay. In reality, the STR regulations will only exacerbate the housing shortage for employees in the County and the affordable housing crisis, as these regulations will further limit the housing stock for low- and moderate-income families and workers in favor of wealthy property owners and STR entrepreneurs.

For these reasons, the Draft EIR's analysis of the potential for significant displacement is inadequate and requires revision.

C.4 The Draft EIR's Analysis of Noise Impacts is Legally Inadequate

Impact question 4.8-1 asks, "Would the project generate a substantial increase in non-transportation operational noise?" The analysis of this question states, "Given the information available, it is prudent to conclude that noise associated with existing vacation rental is a substantial concern. Absent any regulations addressing this issue, an increase in vacation rentals would be expected to result in a proportionate increase in noise complaints and potential noise ordinance violations." (Draft EIR, p. 4.8-11) However, the Draft EIR concludes the impact is less than significant because the STR regulations prohibit amplified sound at any Vacation Rental, the County noise ordinance has enforceable standards and the County has various tools to enforce any noise violations, including citations and revocation of a Vacation Rental license. However, the analysis fails to address the significant number of Homestay rentals that will be allowed if the August 2024 Ordinances are adopted and what appears to be the lack of enforcement officers to address noise violations. Accordingly, the Draft EIR's reliance on robust enforcement of existing noise regulations is misplaced.

Impact question 4.8-2 asks, "Would the project generate a substantial increase in traffic noise?" The Draft EIR concludes this impact is less than significant primarily because the number of CVRs is capped in each land use planning area which the County believes will ensure that Vacation Rentals are not concentrated in certain areas. However, once again this analysis fails to analyze the impact of potentially unlimited Homestay rentals on traffic noise as renters will undoubtedly travel to the Vacation Rentals in a vehicle. For these reasons, the Draft EIR's analysis of this noise impact question is misleading and legally inadequate.

C.5 The Draft EIR's Alternatives Analysis is Flawed

The Alternatives Analysis is particularly troubling. The purpose of the Alternatives Analysis is to provide alternatives to the project that meet most of the project's basic objectives and avoid or substantially lessen the project's significant environmental impacts. (14 CCR 15126.6(a)). With regard to this Project, the Draft EIR concludes that all of the environmental impacts from the Project are less than significant and that no mitigation measures are necessary. Accordingly, technically, an Alternatives section was not required except perhaps to compare the No Project Alternative to the Project. However, the drafters decided to include several Alternatives in the Alternatives Analysis not because they would avoid or substantially lessen Project impacts, but as a means of avoiding having to analyze the proposals as part of the Project under the EIR. For example, Alternative 2 is the Homestay Alternative, in the discussion of this Alternative it unapologetically states it was included solely "to allow home owners/principal residents the opportunity to participate in the vacation rental economy and allow for income generating opportunities to help maintain or keep a residence". (Draft EIR, Section 6.4.2) Yet, the environmental impacts associated with this Alternative related to air quality, energy, noise, transportation and Utility and Service Systems are greater than the Project studied by the EIR. Tellingly, the page and a half of "analysis" fails to provide any quantification of how much greater these impacts are as compared to the Project. Importantly, the analysis fails to indicate whether the addition of Homestays to the Project would result in significant impacts that would require mitigation or which are unavoidable. The public has a right to have complete analysis as to the scope and magnitude of the environmental impacts associated with Homestays. This analysis is entirely inadequate and clearly does not represent a good faith effort at full disclosure.

D. The STR Regulations Conflict with Monterey County Code Chapter 16.80

The County's private roads ordinance, MCC Chapter 16.80, requires all applicants for discretionary permits under Titles 20 and 21 of the MCC, which the STR regulations seek to amend, obtain "[w]ritten permission to use a private road for the project from a private road governing structure[.]" (MCC Section 16.80.040(A)(3)). All roads in the Del Monte Forest are private roads and PBC is the private road governing structure in the DMF. The STR regulations acknowledge this requirement for the issuance of CDPs or CUPs for CVRs. (Attachment C, p. 9). For the foregoing reasons, among others, PBC will not provide written approval for CVRs made under the new system that County staff have proposed under the STR regulations.

The proposed STR regulations directly undercut and inherently violate the provisions of MCC Chapter 16.80, by allowing the approval of Homestays through the issuance of a non-discretionary Vacation Rental Operation License. Since Homestay vacation rentals would be

permitted in every single family residence within the County, the impact of Homestay rentals on private roads will be vastly greater than the impacts associated with CVRs. Accordingly, the STR regulations must be amended to require that operators of Homestays comply with the requirements of MCC Chapter 16.80.

E. The County's Proposed Vacation Rental Regulations Pose a Unique Threat to the Del Monte Forest

The residential character of the Del Monte Forest is uniquely threatened by the County's proposed STR regulations. With its location in proximity to a beautiful portion of the Pacific coastline, world-famous Pebble Beach facilities and recreational opportunities, natural resources (including environmentally sensitive habitat areas), overall scenic attractiveness, and substantial number of single-family homes, it should be expected that Del Monte Forest will be a prime target for the establishment of short term rentals within the County. The Del Monte Forest will be overrun by vacationers with no long term ties to the area and no interest in investing in the community, engaging in civic life, or ensuring the long term health and preservation of its natural resources.

Chapter 2 of the DMF Land Use Plan describes Del Monte Forest as follows: "The spectacular meeting of forest, land, and sea in the Del Monte Forest area is more than an important scenic attraction of the Monterey Peninsula; it is also a vital habitat for a variety of vegetation and wildlife species, included several rare and endemic species dependent on the unique ecosystem. That so much of the Forest's natural and scenic resources remain unspoiled is also significant; it provides a sharp contrast to urban developments in most areas of the nearby cities of Carmel-by-the-Sea, Pacific Grove, and Monterey." Indeed, the Del Monte Forest area is one of the most iconic communities in California and deserves to be treated as such.

Further, Chapter 3 of the DMF LUP provides that the "Forest is also home to a vibrant residential community which has been melded with the forest resource over time". The County's proposed STR regulations stand to destroy the vibrancy of the residential community and its social fabric by causing the corporatization of housing and allowing for the replacement of long term residents with substantial new numbers of vacationers and visitors. Vacationers utilizing private residences in the Forest as their vacation rentals cannot be expected to "meld" harmoniously with the valuable and fragile ecosystem that is the Del Monte Forest.

The DMF LUP also states that "retention of the Del Monte Forest area's unique natural character is paramount"; and that the LUP is intended to "ensure that the beauty of the Del Monte Forest Area coast, its tranquility, and the health of its environmental will not be marred

by public overuse or neglect.” The County’s proposed STR regulations directly contravene these objectives, and threaten to turn the tranquility and natural character of the area into a tourist-serving destination that is not in the best interest of the County.

In addition, it should be noted that since the Del Monte Forest area spans both DMF land use plan area and the GMP land use plan area, the 4% cap that applies to individually to each planning area will, in practice, mean that the Del Monte Forest could experience 8% of all residential homes licensed as Commercial Vacation Rentals. And, as noted above, essentially all of the single family residences in Del Monte Forest could turn into Homestay vacation rentals.

Finally, the DMF LUP contains various policies designed to protect the supply of long term housing opportunities and ensure their provision, particularly for persons and families of low to moderate income. The allowance for STRs will take vital long term housing opportunities off the market and inevitably increase the cost of housing within Del Monte Forest. The experience of other cities in implementing short term rental regulations is instructive. According to a Report prepared by researchers at the School of Urban Planning at McGill University, since 2015, short-term rentals contributed to an increase in \$810 in rents on average per year in the City of Los Angeles, and between 2015 and 2022, have caused 2,500 homes to be taken off the long-term market. (https://upgo.lab.mcgill.ca/publication/strs-in-los-angeles-2022/Wachsmuth_LA_2022.pdf) A 2023 study published in the Real Estate Economics Journal found that long term rental prices decreased by three percent after the City of Irvine prohibited short term rentals in residential zones. (<https://onlinelibrary.wiley.com/doi/abs/10.1111/1540-6229.12440>) The County’s proposed STR regulations thus directly conflict with the DMF LUP policies and will only exacerbate the County’s housing crisis.

The conflicts between the DMF LUP objectives and policies and the County’s proposed STR regulations must be addressed. Given the unique nature of the Del Monte Forest, it deserves to be treated similar to Big Sur and portions of Carmel and Moss Landing, which were granted exemptions from the County’s allowance for Commercial Vacation Rentals. The regulations should prohibit CVRs and Homestays, which are effectively unlimited and unpoliceable commercial rentals, within the Del Monte Forest area; other more-urban and less environmentally-sensitive areas of the County are far more appropriate for such uses.

For all of these reasons, we respectfully urge the Board to refer these regulations back to County staff to conduct the necessary environmental analysis of the foreseeable impacts

August 26, 2024
Page 15

associated with Homestays and to modify the proposed STR regulations to prohibit Commercial Vacation Rentals and Homestay vacation rentals within the Del Monte Forest.¹

We thank you for the opportunity to provide comments on the EIR and the Project and would like to make clear that Pebble Beach Company is generally not opposed to some type of allowance for short term vacation rentals of limited duration and which are rented out a limited number of times per year, but is submitting this letter because of its serious concerns about the deleterious impacts of the County's STR regulations as proposed. We appreciate your consideration of these issues and hope that the County will return with a version of the STR regulations that will not result in such a material and detrimental impact upon the character of unincorporated areas within the County, particularly within the Del Monte Forest area.

Very truly yours,

ALESHIRE & WYNDER, LLP



Danny Aleshire

da:DJA

cc (via email): Taylor Price, Associate Planner (pricet1@countyofmonterey.gov)
Kelly Donlon, County Counsel (donlonkl@co.monterey.ca.us)

(enclosures)

¹ Please see attached for proposed revisions to the County's ordinances which would accomplish this.

SHORT TERM RENTAL ORDINANCE CHANGES

Pebble Beach Company's requested changes to the draft short-term vacation rental ordinances to prohibit Commercial Vacation Rentals and Homestays within the Del Monte Forest are shown below (the attachment references below are to those contained in the County's Board Report for the August 27, 2024 Board of Supervisors Meeting).

Attachment C (Attachment A – Title 20 Vacation Rental Ordinance), Section 17, pages 7-9:

Section 20.64.290(B)(14) should be amended (additions in brackets and underlined) as follows:

“Vacation Rental” means the use, by any person, of Residential Property for transient lodging where the term of occupancy, possession, or tenancy of the property by the person entitled to such occupancy, possession, or tenancy for a period of 30 consecutive calendar days or fewer, counting portions of calendar days as full days. “Vacation Rental” includes Commercial Vacation Rentals, Homestays, and Limited Vacation Rentals. “Vacation Rental” does not include a bed and breakfast facility, hotel, motel, hostel, inn, roominghouse, boardinghouse, rooming or boarding[, and does not count toward the limitation on the number of “visitor-serving units” or “guestrooms” included in any certified Land Use Plan].

Section 20.64.290(D) should be amended (additions in brackets and underlined) as follows:

1. [Except as set forth in subsection (D)(2) ,] Homestays are allowed and exempt from a Coastal Development Permit pursuant to 20.70.120(S), in the following zone districts, subject to the requirements of this Section: . . .

2. Homestays shall be prohibited [within the Del Monte Forest Area Land Use Plan, and] in any other zone district.

Section 20.64.290(F)(3)(d) should be amended (additions in brackets and underlined, deletions in strike-through) as follows:

d. Del Monte Forest Land Use Plan Area as follows: [Commercial Vacation Rental uses are prohibited within the Del Monte Forest Land Use Plan Area.] ~~A total of 57 maximum Coastal Development Permits shall be issued at any given time for Commercial Vacation Rental uses within the Del Monte Forest Land Use Plan area.~~

Attachment F (Title 21 Vacation Rental Ordinance), Section 40, pages 8-10:

Section 21.64.290(B)(13) should be amended (additions in brackets and underlined) as follows:

“Vacation Rental” means the use, by any person, of Residential Property for transient lodging where the term of occupancy, possession, or tenancy of the property by the

person entitled to such occupancy, possession, or tenancy for a period of 30 consecutive calendar days or fewer, counting portions of calendar days as full days. “Vacation Rental” includes Commercial Vacation Rentals, Homestays, and Limited Vacation Rentals. “Vacation Rental” does not include a bed and breakfast facility, hotel, motel, hostel, inn, roominghouse, boardinghouse, rooming or boarding[, and does not count toward the limitation on the number of “visitor-serving units” or “guestrooms” included in any certified Land Use Plan].

Section 21.64.290(D) should be amended (additions in brackets and underlined) as follows:

1. [Except as set forth in subsection (D)(2),] Homestays are allowed in the following zone districts, subject to the requirements of this Section: . . .

2. Homestays are prohibited [in that part of the Del Monte Forest located within the Greater Monterey Peninsula Area Plan, and] in any other zone district.

Section 21.64.290(F)(3)(f) should be amended (additions in brackets and underlined, deletions in strike-through) as follows:

Greater Monterey Peninsula Area Plan as follows: [Commercial Vacation Rental uses are prohibited in that part of the Del Monte Forest within the Greater Monterey Peninsula Area Plan.] ~~A total of 155 maximum Use Permits shall be issued at any given time for Commercial Vacation Rental uses within the Greater Monterey Peninsula Area Plan area.~~

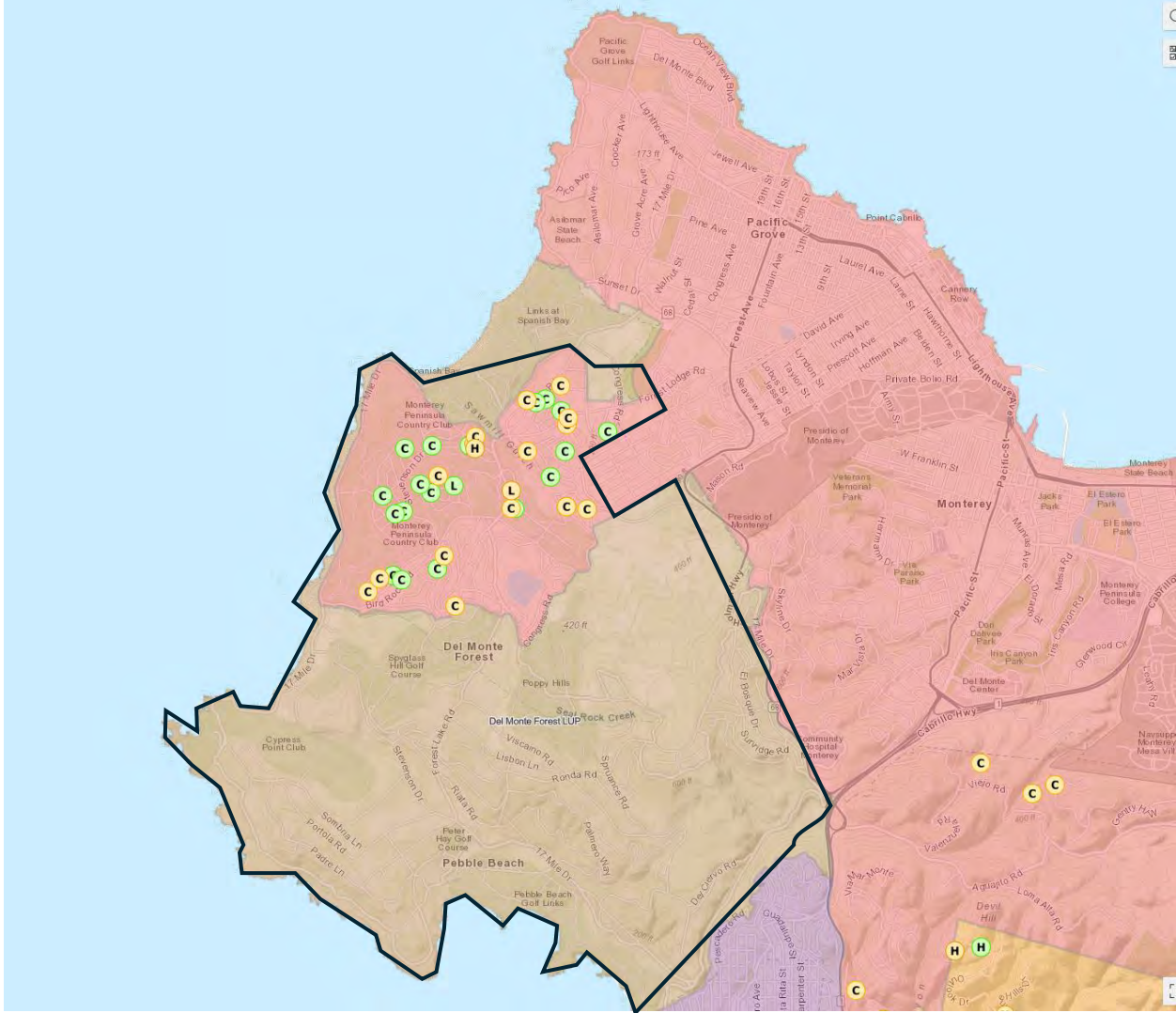
Attachment E (Title 7 Vacation Rental Ordinance) pgs. 6-7

Section 7.120.020(Y) should be amended (additions in brackets and underlined) as follows:

“Vacation Rental” means the use, by any person, of Residential Property for transient lodging where the term of occupancy, possession, or tenancy of the property by the person entitled to such occupancy, possession, or tenancy for a period of 30 consecutive calendar days or fewer, counting portions of calendar days as full days. “Vacation Rental” includes Commercial Vacation Rentals, Homestays, and Limited Vacation Rentals. “Vacation Rental” does not include a bed and breakfast facility, hotel, motel, hostel, inn, roominghouse, boardinghouse, rooming or boarding[, and does not count toward the limitation on the number of “visitor-serving units” or “guestrooms” included in any certified Land Use Plan].

Vacation Rentals Dashboard

Del Monte Forest Approved VR



- Solid Black Line = General DMF Boundary Line
- Red Area = Greater Monterey Peninsula Planning Area
- Green Area = Del Monte Forest LUP Planning Area



PEBBLE BEACH
COMPANY

October 9, 2024

Melanie Beretti, AICP
Acting Chief of Planning
Monterey County Housing and Community Development
1441 Schilling Place
Salinas, CA 93901

RE: Objection to Issuance of Vacation Rental Permits in Del Monte Forest

Dear Melanie:

Thank you for meeting with us on September 12, 2024, which as you know was the latest in a years-long series of meetings between County staff and Pebble Beach Company relating to short-term vacation rentals. We again discussed Pebble Beach Company's position that vacation rentals, and in particular, Commercial Vacation Rentals and Homestays (which the vacation rental ordinances recently passed by the Board of Supervisors will allow within Del Monte Forest) constitute commercial use of property in violation of the CC&Rs contained in the deeds on residential properties in Del Monte Forest. You invited us to submit this letter, which constitutes the Company's "blanket objection" to the issuance of such permits.

While not all deeds underlying properties in Del Monte Forest are uniform, to the best of my knowledge, every deed has language that prohibits commercial use of the premises, and California courts have concluded that restrictions on vacation rentals contained in CC&Rs are reasonable and enforceable. The language reproduced below constitutes CC&R language which is representative of the language contained in other Del Monte Forest deeds:

No trade, business or profession of any description shall be conducted on said premises. Said premises shall not be used for any purpose whatever except solely and exclusively for the purpose of construction and maintenance of not more than one private single family residence with appurtenant detached guest and servants' cottages (without cooking facilities), greenhouse, garage, and if approved in writing by Grantor, a stable for saddle horses.

The plain meaning of the CC&R language bans short-term vacation rentals in the Del Monte Forest. Arguments to the contrary are entirely unpersuasive. For example, arguing that a use titled "commercial vacation rental" is somehow actually not a commercial use of the property defies logic and would be a problematic position for the County to take. In addition, the fact that commercial vacation rentals operated pursuant to Chapters 7.120 and 7.121 are required to obtain an annual business or operation license and pay transient occupancy taxes makes any such rentals, by definition, a business. Like hotels, vacation rentals are a business conducted for the

purpose of making a profit, and are treated as such by federal laws and the County's own code provisions regulating business operations and the income derived therefrom.

Homestays are virtually indistinguishable from commercial vacation rentals. There are no restrictions on the number of rentals allowed by either classification. The permitting process for Homestays will simply be easier and less expensive, and since there is no cap, these will undoubtedly have the most significant impact on the Del Monte Forest residential community, particularly given the County's admitted challenges with regard to enforcement. Accordingly, Pebble Beach Company also objects to Homestays as a prohibited commercial use of property in Del Monte Forest.

There are three commercial land use designations allowed in Del Monte Forest pursuant to the Del Monte Forest Land Use Plan. Visitor-Serving Commercial allows "Major hotel or inn accommodations," defined as The Lodge, The Inn, Poppy Hills, and the Area M hotel site owned by Pebble Beach Company. The other two commercial designations are solely support functions for the uses permitted in those areas zoned as Visitor-Serving Commercial. The remainder of the Forest is zoned residential, which, consistent with the deeds, does not allow for commercial use.

Separately, for the portion of Del Monte Forest located within the Greater Monterey Peninsula Area Plan (GMP LUP), commercial uses are outright prohibited; the entire area is zoned for residential uses or open space/resource conservation.

Accordingly, Pebble Beach Company believes that operation of vacation rentals in Del Monte Forest would violate both the CC&Rs and both the Del Monte Forest LUP and the GMP LUP, and asks the County on this basis to deny applications for commercial and homestay short-term vacation rentals.

Finally, during our meeting, Pebble Beach Company affirmed its intent to require proof of access from applicants pursuant to Chapter 16.80 of the Monterey County Code, and restates that intent here. Del Monte Forest residents are granted right of access to their single family residence on roads privately owned by Pebble Beach Company subject to the payment of an annual road fee (which in many cases is only \$25 per year). Since commercial use of the property is specifically prohibited, the access agreement does not cover access for that purpose.

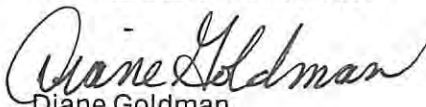
County staff stated that it will not enforce that portion of Chapter 16.80 that explicitly refers to right of access for a specific "Project." We understand the County's position to be effectively "reading out" the law's requirement that "[a]n applicant shall provide . . . [w]ritten permission to use a private road *for the project* from a private road governing structure[.]" Ch. 16.80.040(A)(3) (emphasis added); see *also* Ch. 16.80.040(C)(1)(g); Ch. 16.80.040(D)(6). If the applicant has right of access to the property via the private roads for any purpose (i.e., the right to access a home for residential purposes), the County has told us its position is that it will assume right of access via the private roads for the purposes of running a vacation rental. This position runs contrary to the plain text of the law, and in effect deletes the "for the project" requirement from the text of the law. A change of use from residential to commercial constitutes a specific project under the law; indeed, there would be no need for an "application" if the use did not constitute a "project" under the law. The plain text of both the private roads code chapter and the recently enacted short-term vacation rental ordinances support this common sense reading of both laws. As the owner of the

private roads that will be used to access such commercial projects, the law grants Pebble Beach Company the right to grant or deny access for the purposes of such projects under Chapter 16.80. Pebble Beach Company intends to withhold consent for the use of its privately owned and operated roads for such commercial purposes, and respectfully requests the County to reconsider its position and ensure enforcement of Chapter 16.80 as written.

In summary and in accordance with our longstanding public-private partnership on this short-term rental issue, Pebble Beach Company respectfully submits that the County must deny applications for vacation rentals in Del Monte Forest because, among other reasons, such rentals constitute a prohibited commercial use of a residential property. In addition, as the sole owner and operator of private roads in Del Monte Forest, Pebble Beach Company intends to enforce its statutory rights pursuant to Chapter 16.80 to grant or deny access to its private roads in the Forest, and respectfully requests the County's cooperation in this effort.

Sincerely,

PEBBLE BEACH COMPANY

A handwritten signature in cursive script that reads "Diane Goldman".

Diane Goldman
General Counsel

- c. Kathleen Lee, Director of Governmental and Community Affairs
Patrick Hovakimian, Chief Legal Officer

SHUTE, MIHALY
& WEINBERGER LLP

396 HAYES STREET, SAN FRANCISCO, CA 94102
T: (415) 552-7272 F: (415) 552-5816
www.smwlaw.com

HEATHER M. MINNER
Attorney
Minner@smwlaw.com

August 8, 2025

Via Electronic Mail

California Coastal Commission
Central Coast District
725 Front Street, Ste 300
Santa Cruz, CA 95060
Email: CentralCoast@coastal.ca.gov

Re: Monterey County LCP Amendment No. LCP-3-MCO-24-0039-1
(Vacation Rentals): August 13, 2025 Agenda Item W15A.

Dear Chair Harmon and Honorable Commissioners:

On behalf of this firm's client, the Big Sur Local Coastal Program Defense Committee (BSDC), I write to communicate BSDC's support for Monterey County's Vacation Rental Ordinances. The BSDC is a group of residents and business owners concerned for the preservation of the cultural and natural values of Big Sur and the land use plan that protects them for the public to enjoy. The BSDC has been carefully tracking the County's consideration of vacation rental regulations for over a decade, especially in the Big Sur Land Use Planning Area, and has actively participated in development of the County's Ordinances.

While BSDC believes that greater restrictions on vacation rentals are warranted under Big Sur Land Use Plan policies, it appreciates the thorough planning process that Monterey County has undertaken to analyze the environmental and economic impacts of the Ordinances and to consider input from numerous community and special interest groups. Ultimately, we believe that **the Vacation Rental Ordinances strike an appropriate balance that will both protect Big Sur's cultural and natural values and allow a significant amount of vacation rental opportunities in an area with acute resource constraints as well as affordable housing shortages** for the workers who support visitors and the hearty residents that make Big Sur a unique community to visit.

The Coastal Commission's Central Coast staff have done a good job summarizing the County's Vacation Rental Ordinances and providing ample support for the Commission's land use plan consistency determination and CEQA findings. The staff report also capably responds to the exaggerated critiques of the Monterey County Vacation Rental Alliance, who have long opposed restrictions on vacation rentals in the County. **The members of the BSDC urge the Commission to adopt staff's recommendation to certify the proposed LCP amendment as submitted, so that the County may begin to implement these long-awaited regulations.**

In this letter, we briefly provide an overview of the unique constraints within the Big Sur planning area. We also highlight the significant amount of vacation rentals allowed countywide in the coastal zone, *and* within Big Sur, under the County's Ordinances. Finally, we demonstrate that by balancing resource and community preservation with visitor overnight opportunities, the Ordinances are compatible with the Big Sur Coast Land Use Plan and in line with other vacation rental ordinances recently approved by the Commission.

I. Big Sur's Resource Constraints, Housing Shortages, and the Adverse Impacts of Short-Term Rentals.

There are few places in the world that have been subject to more thoughtful and passionate planning efforts than the Big Sur Coast, efforts that have been directed toward the protection of public access to its renowned scenic highway and the preservation of its natural and cultural values. The BSDC has been concerned about vacation rentals since their rise in popularity and has repeatedly expressed its concerns about their adverse impacts.

The County's Environmental Impact Report (EIR) for its Vacation Rental Ordinances demonstrates the need for strongly regulating vacation rentals in the Big Sur area. The EIR is available here: [Vacation Rental Ordinances \(Coastal & Inland\) | County of Monterey, CA](#). For instance, the EIR rightfully concludes that "Big Sur has unique housing, transportation, and environmental constraints," which support the proposal to "prohibit commercial vacation rentals in Big Sur." (Draft EIR at 4.7-9). The EIR also correctly recognizes the severe impact of "seasonal, recreational, or occasional-use housing units" on residential vacancy rates and housing prices in areas like Big Sur. (Draft EIR at 3-9). The California Coastal Commission received an Informational

Briefing on Housing, where expert witnesses provided concrete data echoing these concerns.¹

The BSDC appreciates Coastal Commission staff’s recommendation to approve the proposed restrictions on vacation rentals in the Big Sur Land Use Planning Area in light of the unique constraints and challenges faced in this area and the certified LCP policies to address them. And as the staff report emphasizes (pp. 25, 31), these restrictions are far from a ban on vacation rentals. Significant vacation rental opportunities are still allowed, as discussed below.

II. The Vacation Rental Ordinances Allow Significant Vacation Rental Opportunities, Including in the Big Sur Area.

As with many of its exaggerated claims, the Monterey County Vacation Rental Alliance suggest that the County’s Vacation Rental Ordinances would “Eliminate the primary source of affordable coastal accommodations.” (June 12, 2025 letter, p. 1). This is far from the case.

In fact, the Ordinances allow for an unlimited number of vacation rentals in a residence where the owner is present (defined as “Homestays) in all coastal areas of the County. These hosted vacation rentals provide significant coastal overnight opportunities. **The Vacation Rental Alliance’s own analysis found 961 hosted vacation rentals in the County’s coastal area, with a total guest capacity of 2,725.** (June 12, 2025 letter, p. 55). And hosted vacation rentals can be expected to increase under the Ordinances as licensing is clarified and streamlined.

The Ordinances also allow for an unlimited number of residences to be used for unhosted, whole house vacation rentals (up to 30-day stays), provided vacation rentals are limited to three times per year (termed “Limited Vacation Rentals”). **Thus, an unlimited number of residences in the Coastal Zone can be used as unhosted, whole-house vacation rentals up to 90 days a year.**

To be clear, these Homestays and Limited Vacation Rentals are also allowed in the Big Sur area. Outside of the Big Sur area, the Ordinances also allow Commercial Vacation Rentals (unhosted, whole-house rentals that can be rented for an unlimited number of days per year), for **up to 4%** of the number of single family units.

¹ <https://documents.coastal.ca.gov/reports/2023/12/Th5/Th5-12-2023-agenda.pdf> (presentation of Dr. David Wachsmuth).

The County's Vacation Rental Ordinances thus preserve and facilitate a significant amount of vacation rental overnight accommodations in the County's Coastal Zone. And this supplements the other types of accommodations available to visitors, including hotels, campsites, and hostel beds.

The Coastal Commission staff report for this item suggests that, while the County's Vacation Rental Ordinances are well supported, allowing some Commercial Vacation Rentals, could be warranted in the Big Sur area given the "higher residential vacancy rates compared to other planning areas." Staff Report at 30. We appreciate the County's thoughtful response on this issue in the Final EIR, which noted that "[d]ue to the limited amount of vacant land, housing for employees, and transportation infrastructure, uses such as commercial vacation rentals are not appropriate in the Big Sur Coast Planning Area." (Final EIR at 3-7). We additionally note that the current vacancy rates have been greatly influenced by the County's current lack of enforcement against short-term rentals and other special uses, with significant impacts on housing availability (especially for workers in Big Sur's tourism industry) and other resources. Rather than supporting an expansion of Commercial Vacation Rentals in the Big Sur Land Use Plan Area, **these vacancy rates help explain the need for a strong Vacation Rental Ordinance and County enforcement.**

III. The Vacation Rental Ordinances Strike an Appropriate Balance.

Given the vacation rental allowances discussed above, BSDC agrees that the County has found an appropriate balance between "reasonable interests in serving visitors and the desire to address the sensitivities upon which vacation rental ordinance was developed: preserving neighborhoods, addressing potential nuisances, ensuring reasonable long-term housing opportunities, and other important community values." (Final EIR at 3-14). The Coastal Commission has recently recognized the importance of addressing these concerns in the consideration of short-term rental ordinances, particularly with respect to housing affordability.²

Indeed, Monterey's Vacation Rental Ordinances are similar to other ordinances that the Commission has recently approved. For example, the Commission approved a localized approach in Marin County, where the ordinance reduced the number of existing vacation rentals in some communities, while allowing an increased number in

² See, for instance, the restrictive short-term rental ordinances recently approved by the Commission in jurisdictions like the County of Marin (<https://www.marinij.com/2024/04/12/marins-short-term-rental-caps-approved-by-coastal-commission/>).

other areas. (Marin County LCP Amendment Number LCP-2-MAR-24-0002-1 [Short Term Rentals], April 2024).

The Commission has also recently approved targeted prohibitions of vacation rentals. For example, the Commission certified Grover Beach's amendment to its LCP IP that prohibited vacation rentals in specific housing types, including single room occupancy facilities, two-unit housing developments, urban lot splits, and ADUs. (City of Grover Beach LCP Amendment Number LCP-3-GRB-24-0009-1, May 2024).

The Commission has also approved vacation rental caps as low as 1% of overall current housing stock. (*See*, City of Pacifica LCP Amendment Number LCP-2-PAC-23-0023, June 2024; City of San Diego Major Amendment No. LCP-6-SAN-21-0046-2, March 2022; City of Seal Beach Application No.: 5-23-0482, July 2024). These 1% caps are much lower than Monterey County's 4% cap for most of the County's Coastal Zone. And those ordinances did not exempt from the caps Limited Vacation rentals, which would be allowed in unlimited number throughout the Monterey County Coastal Zone. Monterey's Ordinances are also more permissive than the Pacifica and Seal Beach caps, which did not exempt hosted vacation rentals.

Importantly, Monterey's balanced approach to regulating vacation rentals allows it to accommodate all of its LCP policies, as discussed below.

IV. The Vacation Rental Ordinances Accommodate All LCP Policies.

The County's Vacation Rental ordinances ably accommodate both policies to provide public access as well as policies to protect residential uses and affordable housing. The commission should therefor certify the proposed amendments without delay.

Under Public Resources Code section 30513(b), "[t]he Commission may only reject . . . implementing actions on the grounds that they do not conform with, or are inadequate to carry out, the provisions of the certified land use plan." This statutory limitation makes sense where the Commission has already determined that a certified land use plan meets the requirements of Chapter 3 of the Coastal Act (Pub. Resources Code § 30512(c)), as the Commission did for the County's LUP. To reject an amendment to an Implementation Plan, the Commission also must specify the "provisions of the land use plan with which the rejected [implementing] ordinances do not conform or which it finds will not be adequately carried out together with its reasons for the action taken."

In approving the Short Term Rental Ordinances, the Board of Supervisors for the County of Monterey found that they were consistent with the County's certified LCP and each of the Land Use Plans for the four planning areas. (Monterey County Board of Supervisors Resolution No. 24-300, available here: [Vacation Rental Ordinances \(Coastal & Inland\) | County of Monterey, CA](#)). In particular, the Board found that the Ordinances' restrictions on Vacation Rentals are necessary to conform with the Big Sur Land Use Plan as follows:

The proposed ordinance is consistent with the Big Sur Coast Land Use Plan (BSLUP) by preserving the rural, wild, and unspoiled nature of the Big Sur Coast Planning Area by prohibiting commercial vacation rentals and allowing limited vacation rentals and homestays with appropriate regulations. Commercial vacation rentals are inconsistent with the BSLUP Policy 5.4.2.G.2, which states that development in rural residential areas shall be limited to residential uses in order to protect residents from unwanted intrusion by other incompatible activities, such as visitor serving uses. Further, BSLUP Policy 5.1.1 states that these residential areas are not well suited for commercial or visitor uses; these areas should continue to be for residential purposes only. As commercial vacation rentals are more akin to a commercial use, commercial vacation rentals operating in residential areas could disturb the existing residents and put a strain on already limited resources (such as potable water, septic systems, and transportation infrastructure). Limited vacation rentals and homestays are allowed in the Big Sur Coast Planning Area as they are more akin to residential uses and would minimize the impact on existing residents.

The Board also found that the Ordinances are consistent with coastal access policies as follows:

The proposed ordinance is consistent with Coastal Act Public Access Policies (30210, 30213, 30222, and 30252) in that the proposed ordinance protects, provides, and enhances coastal access and recreation opportunities for the general public by creating a clear regulatory framework for vacation rentals. Vacation rentals can provide important visitor serving facilities at a lower cost than traditional hotels, particularly for groups or larger families traveling together. The proposed ordinance prohibits commercial vacation rentals in certain areas of coastal Monterey County with resource constraints (Carmel Highlands), where existing policies limit non-residential uses in residential areas (BSLUP Policy 5.4.2.G.2), or areas with limited housing stock (Moss Landing Community Plan). This prohibition of

commercial vacation rentals in certain areas should be weighed against the allowability of homestays and limited vacation rentals in all four of the coastal planning areas of Monterey County. Homestays, in particular, can provide lower-cost visitor serving facilities to the public and are allowed in all coastal areas of Monterey County. **The proposed ordinance balances the Coastal Act and the County’s LCPs by ensuring that vacation rentals are regulated but also ensuring that the community character is protected consistent with public safety needs and coastal resource protections.**

The balance struck by the County in its Vacation Rental Ordinances is an appropriate way to accommodate multiple values protected by the Coastal Act and LCP policies. As the California Supreme Court has emphasized, Public Resources Code section 30513(b) does not preempt local planning, but rather ensures “local discretion and autonomy in planning subject to review for conformity to statewide standards.” *Yost v. Thomas* (1984) 36 Cal.3d 561, 572. **In conducting this review, the LUP and the implementation plan “should be interpreted together to give effect to all provisions of the local coastal program.”** *Ross v. Coastal Com.* (2011) 199 Cal.App.4th 900, 928 (emphasis added). The County’s Vacation Rental Ordinances accomplishes just this, giving effect to all provisions of the LCP.

The Monterey County Vacation Rental Alliance suggests in its June 12, 2025 letter that the Court of Appeal’s decision in *Kracke v. City of Santa Barbara* (2021) 63 Cal.App.5th 1089 establishes a broad principle that restrictions on vacation rentals are inconsistent with the goals of the Coastal Act. This is an incorrect summary of the case. *Kracke* simply held that restricting vacation rentals in the coastal zone requires both a local agency and the Commission’s review because it counts as “development” under the Coastal Act. *Kracke*, 63 Cal.App.5th at 1097 (“regulation of [vacation rentals] in a coastal zone ‘must be decided by the City and the Coastal Commission’”).

Indeed, the County duly followed *Kracke*’s command by properly seeking certification of its Vacation Rental Ordinances by the Commission. The Commission is in no way constrained from agreeing with the County that the Ordinances are consistent with the Coastal Act and County LCP policies. In fact, the Commission should do so to give effect to all provision of the County’s certified LCP.

* * *


The Big Sur Local Coastal Program Defense Committee appreciates this opportunity to comment on Monterey County’s amendment to its Local Coastal Plan

California Coastal Commission
August 8, 2025
Page 8

Implementation Plan to provide regulations for vacation rentals. We urge the Commission to certify the proposed LCP amendment as submitted by the County of Monterey.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



Heather M. Minner

cc: Mary Wright and Kirk Gafill
Big Sur Local Coastal Program Defense Committee

Kirk Gafill
Big Sur Local Coastal Program Defense Committee
Big Sur, California 93920

August 8, 2025

California Coastal Commission
Central Coast District
725 Front St, Ste 300
Santa Cruz, CA 95060
E-Mail: CentralCoast@coastal.ca.gov

Re: Monterey County LCP Amendment No. LCP-3-MCO-24-0039-1
(Vacation Rentals): August 13, 2025 Agenda Item W15A.

Dear Chair Harmon and Honorable Commissioners:

I am a long-time resident of Big Sur and serve as a spokesperson for the Big Sur Local Coastal Program Defense Committee. BSDC has over 250 members of the Big Sur community as supporters, both residents and business owners. For over a decade, we have been concerned with the great increase in the number of short-term rentals in the Big Sur Planning area and an inadequate regulatory system limited to complaint-based code enforcement.

Through many years of public meetings and planning efforts, the County has finally developed short-term rental regulations that, while not perfect, are ones that BSDC can support. We urge the Commission to approve the County's Vacation Rental Ordinances to achieve resource protections and regulatory clarity for visitors, residences, and the owners of vacation rentals alike.

The Big Sur coast has been acknowledged throughout the world as a unique and special area of extraordinary environmental value, aesthetic beauty, and home to an exceptional and vibrant community whose way of life is integral to protecting the environment and enhancing the visitor experience. But we have seen the negative impacts of the continued expansion of commercial destination activity here.

For example, as short-term rentals increased we witnessed the conversion of long-term housing to commercial uses. Primary residences, caretaker units, guest houses, guest rooms and other structures have been converted to short-term rentals, reducing the amount of affordable housing in Big Sur. This has caused an increased numbers of public and private employees to commute from the Monterey Peninsula and beyond where they can find affordable housing. The cost and time spent commuting, often an hour or more driving time each way, further limits the availability of qualified visitor serving employees for public agencies (United States Forest Service, California Department of Parks and Recreation, California Highway Patrol, Carmel Unified School District, Big Sur Unified School District, etc.) whose staff work in Big Sur. Equally impacted are

those employees of the visitor serving private sector and community serving organizations such as the Big Sur Volunteer Fire Brigade and Big Sur Health Center. Increased commercial vacation rentals has also strained limited resources necessary to support residents and visitors such as potable water, septic systems, and transportation infrastructure.

We believe that the County has struck an appropriate balance for the Big Sur area. The Ordinances provides residents of Big Sur with economic opportunities to rent their homes as Limited Vacation rentals or Homestays. While the Ordinances also discourage the further conversion of residences to full-time commercial vacation rentals with owners that do not live or work in Big Sur.

It is also important to note that the Limited Vacation rentals or Homestays, given the unique feature of a limited number of rental periods (Limited Vacation rentals) and of both typically having on-site resident management/staffing can also reasonably be expected to have lower operational costs (i.e. less reliant on commuting support staff with attendant need to pay wages that cover labor, transportation and housing costs) and can thus provide lower cost accommodations to the public than commercial vacation rentals, which are typically operated and supported as full time investment concerns with few having on-site staff, thus increasing operational costs, community impacts, and need for higher revenue levels.

The Consistency Determination in the Coastal Commission's staff report concludes that "a meaningful vacation rental market would be maintained in the County's coastal areas, while also protecting coastal resources and housing and community needs and objectives." The BSDC agrees. We urge the Commission to certify the proposed LCP amendments as submitted without delay so that Monterey County can begin to effectively implement these balanced regulations.

Very truly yours,



Kirk Gafill
Big Sur Local Coastal Program Defense
Committee
48510 Highway 1
Big Sur, CA 93920



Caring for the coast for 60 years

Community Association of Big Sur is a 501 (c) 3 (EIN 77-0091132). Our shared mission is to protect and defend the rural and residential character, and to preserve the natural and aesthetic beauty of the Big Sur coast; to provide for the health, safety, and welfare of the Big Sur Community; to encourage community service and otherwise act in the interests of the residents and property owners of the community. CABS is committed to a collaborative approach towards responsible land stewardship. CABS believes that an effective partnership between private and public property owners is essential for a sustainable and healthy community.

STAFF

Executive Director

Patte Kronlund

Program Managers

Rachel Goldberger

Rayner Marx

EXECUTIVE BOARD

Ryne Leuzinger, Bd Chair

Martin Palafox, Vice Bd Chair

Colin Twohig, Treasurer

Shelley Dearhart, Secretary

BOARD OF DIRECTORS

Tom Collins

Katie Day

Mike Gilson

Butch Kronlund

Melissa Morris

Pam Peck

Peery Sloan

COMMUNITY ADVISORS

Mike Caplin

Martha Diehl

John Handy

Kate Novoa

Richard "Dick" Ravich

August 6, 2025

Megan Harmon, Chair

California Coastal Commission

455 Market Street

San Francisco, CA 94105

Via Email: ExecutiveStaff@coastal.ca.gov , CentralCoast@coastal.ca.gov

Re: Agenda item W15a - Monterey County LCP Amendment No. LCP-3-MCO-24-0039-1 (Vacation Rentals)

Dear Chair Harmon and Commissioners,

We are writing on behalf of the Community Association of Big Sur (CABS), a local nonprofit organization that serves the Big Sur community and its visitors in a variety of ways. As the housing crisis in coastal communities like Big Sur worsens our staff and board have been especially focused on housing issues. CABS is an organization that has a long history of supporting disaster relief and we are well aware that the impact of a disaster extends beyond the event itself. Following multiple devastating wildfires over the last few decades a significant number of homes in Big Sur have been lost, each of which means one less home for a vital community member. When a significant portion of our already very constrained housing is used for short-term rentals it reduces the availability of affordable housing that much more. For this reason and others described below **the Community Association of Big Sur supports the Commission staff's recommendation to certify the County of Monterey's Implementation Plan for its Local Coastal Program regarding the regulation of Short-Term Rentals / Vacation Rentals.**

The *Big Sur Destination Stewardship Plan (DSP)* is an advisory plan led by CABS which was developed with extensive community input in 2019 and approved by the Board of Supervisors for Monterey County in 2020. It is a strategy designed to strike a balance between welcoming visitors, preserving the environment, and maintaining quality of life for the Big Sur community. It states that:

"Lack of housing threatens the community in multiple ways. The loss of neighborhoods that once housed families and the employees of local establishments has led to declining school enrollments, the ability of the workforce to live and work in Big Sur, environmental and traffic impacts created by long commutes, and the increased difficulty of retaining employees in Big Sur businesses. Not only are the travel conditions on the already overburdened Highway 1 corridor worsened by commuters, but without residents, men and women are no longer available to provide critical local services, such as volunteering for Big Sur Fire and the Mid-Coast Fire Brigade, the Big Sur Health Center, the Big Sur Emergency Response Team, and other vital community services."

For over 10 years CABS has participated in and encouraged public comment on the



public process regarding a Vacation Rental Ordinance in unincorporated Monterey County with the goal of helping craft an ordinance that would be fair and reasonable. CABS appreciates that the Ordinance before the Coastal Commission today is a middle ground approach that is an attempt to strike a balance: preserving existing housing for community members and Big Sur's rural and unspoiled character that is its primary draw for tourists while allowing some level of access to short term rental opportunities (homestays and limited vacation rentals).

We would like to note two items of particular importance to the Coastal Commission regarding the Ordinance

1.) Big Sur currently places a unique emphasis on public access amongst coastal communities in California. According to county data there are 887 homes in Big Sur and roughly 400 hotel rooms in Big Sur, in addition to hundreds of campsites available. Between 42-48% of these homes are second homes, which means there are approximately 500 residences that house community members. Therefore, our current ratio of residences to accommodations for overnight visitors is exceptionally favorable for visitors. This ratio is higher than elsewhere in the county and is a key part of the rationale for a more limited approach to STRs in Big Sur than what is proposed for some of the other unincorporated parts of Monterey County.

2.) If this Ordinance is not passed in its current form and "Commercial Vacation Rentals" (unhosted, whole home rentals with no limits) continue to proliferate it will be the case that long term rentals are severely reduced with a commensurate reduction in the local workforce. Fewer local employees in this remote place will mean that the services that visitors rely on will become fewer and more expensive thus negatively impacting the overall visitor experience for those visiting Big Sur.

While the proposed vacation rental rules may need to evolve over time as implementation progresses and new insights emerge, the Ordinance is a meaningful beginning and is widely recognized in our community as an improvement from the unregulated status quo in Big Sur. We would like to conclude by noting that the California Coastal Act calls for a careful balance between public access, environmental protection, and the needs of local communities. The Big Sur Land Use Plan, certified by your Commission in 1986, was created to uphold that balance, establishing that commercial uses are not permitted in rural residential zones, a principle now under pressure from the rapid growth of short-term rentals. Supporting this Ordinance is essential in realigning visitation practices with the Big Sur Land Use plan.

CABS urges your approval of the Commission staff's recommendation to certify the County of Monterey's Implementation Plan for its Local Coastal Program regarding the regulation of Short-Term Rentals / Vacation Rentals: Agenda item W15a - Monterey County LCP Amendment No. LCP-3-MCO-24-0039-1 (Vacation Rentals).

Sincerely,

A handwritten signature in black ink that reads "Patte Kronlund". The signature is fluid and cursive.

Patte Kronlund
Executive Director

A handwritten signature in black ink that reads "Ryne Leuzinger". The signature is fluid and cursive.

Ryne Leuzinger
Board Chair



August 6, 2025

California Coastal Commission
725 Front Street, Suite 300
Santa Cruz, CA 95060
centralcoast@coastal.ca.gov

VIA EMAIL

RE: Monterey County LCP Amendment Number LCP-3-MCO-24-0039-1 (Vacation Rentals) – Comment Letter

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

Better Neighbors Los Angeles (“BNLA”) is a coalition of hosts, tenants, housing activists and community members who conduct data analysis and research on the short-term rental (“STR”) industry. To balance coastal access and long-term housing needs in the Coastal Zone, BNLA advocates for a regulatory framework centered on true home-sharing through hosted-only rentals.

We respectfully request that the Commission amend Monterey County’s proposed LCP Amendment Number LCP-3-MCO-24-0039-1 (“LCPA”) to permit only true home-sharing within the Coastal Zone. However, should the Commission choose not to adopt a hosted-only policy, we ask that you amend the LCPA to: 1) include a Primary Residency Requirement; 2) cap Commercial Vacation Rentals stays at 60 nights annually; and 3) limit Commercial Vacation Rentals to 1% of existing residential housing stock.

Recommendation 1: Amend LCPA to Require True Home-sharing

True home-sharing, defined as hosted-only STRs where the host resides on-site, is the most effective way to preserve affordable housing and ensure coastal public access for persons of low to moderate income within the Coastal Zone. Hosted STRs offer lower-cost accommodation while maintaining housing availability for long-term residents.

Hosted STRs in Monterey County are more affordable than unhosted STRs, which primarily do not constitute Lower Cost Coastal Accommodations (“LCOAs”). The staff report recognizes that it is speculative to characterize short-term rentals as a lower-cost form of visitor-serving accommodation.

Data from AirDNA underscores this affordability gap: the average nightly rate for an un-hosted STR in Monterey was \$334 while the average nightly rate for hosted STRs was \$173.¹ To qualify as a LCOA, a rental must charge at least twenty-five percent less than the statewide average daily room rate, which was \$187 in January 2025.² The average un-hosted STR in Monterey County does not meet this threshold. As the Coastal Act mandates protection of coastal access for persons of low to moderate income, hosted-only STRs are the most viable path forward.

The Commission and the Monterey County Board of Supervisors have both acknowledged the risks STRs pose to coastal resources and housing availability. The proposed LCPA restricts Commercial Vacation Rentals to North County, Del Monte Forest, and the non-Highlands areas of Carmel. All three of the Land Use Plans (“LUP”) in these areas address the preservation of housing:

- **The North County LUP** decrees that the County must “protect existing affordable housing opportunities in the North County coastal area from loss due to deterioration, conversion, or any other reason.”
- **The Del Monte LUP** states that “housing opportunities for persons and families of low to moderate income should be protected and provided...as a function of new development within the Forest.”
- **The Carmel LUP** both aims to protect the “privacy, safety, health and property of residents” and “encourage the expansion of housing opportunities in the Carmel area for low and moderate income households.”

True home-sharing in hosted-only STRs will best achieve the goals stated in these LUPs.

Recommendation 2: Amend LCPA to Protect Coastal Access and Housing

If the Commission does not adopt a true home-sharing model, we recommend the following amendments to mitigate housing loss and preserve coastal access:

I. Institute a Primary Residency Requirement for Vacation Rentals

Requiring STR hosts of Limited and Commercial Vacation rentals to be primary residents ensures that housing remains primarily for long-term use with short-term renting as a secondary use. This approach has been approved by the Commission in Half Moon Bay and Trinidad,³ and is in effect in nearby San Francisco, Berkeley, and Emeryville.⁴ Residency can be verified through a claimed homeowner’s exemption or notarized lease.

¹ AirDNA data for a STR accommodating 1-2 guests, from April 2022-March 2023.

² <https://industry.visitcalifornia.com/research/report/monthly-travel-indicators-summary>

³ <https://documents.coastal.ca.gov/assets/la/Commission-STR-LCP-Actions-Table-April-2024.pdf>

⁴ San Francisco: https://codelibrary.amlegal.com/codes/san_francisco/latest/sf_admin/0-0-0-27965

Berkeley: <https://berkeley.municipal.codes/BMC/23.314.050>

Emeryville: <https://johnbauters.net/assets/2017/12/ordinance-3.pdf>

II. Cap Commercial Vacation Rentals at 60 Nights Annually

Limiting Commercial Vacation Rentals, or un-hosted STRs, to 60 nights per calendar year curbs the commercialization of housing in Monterey County. This cap mirrors one adopted in Half Moon Bay and approved by the Coastal Commission.⁵ The Coastal Commission has also approved caps on unhosted rentals in the cities of Long Beach, Oxford, and Del Mar.⁶ Under this recommendation, Homestays and Limited Vacation Rentals would remain available for visitors.

III. Limit Commercial Vacation Rentals to 1% of Housing Stock

The current LCPA allows up to 4% of housing stock to be used for Commercial Vacation Rentals. BNLA recommends reducing this to 1% to prevent corporatization of housing through STRs and preserve the neighborhood character in Monterey County. This cap would protect Monterey County's limited housing stock while still allowing Homestays and Limited Vacation Rentals, a more affordable option for coastal visitors.

Conclusion

We urge the Commission to amend the Monterey County LCPA to either adopt a true home-sharing policy or to incorporate the following safeguards into the LCPA: 1) a Primary Residency Requirement; 2) a 60-nights annual cap on Commercial Vacation Rentals; and 3) a 1% cap on the use of existing residential housing stock for Commercial Vacation Rentals. Should you have any questions or would like to receive additional information, please contact Maura O'Neill at maura@betterneighborsla.org.

Sincerely,

/s/

Randy Renick

⁵ <https://documents.coastal.ca.gov/reports/2023/3/W14b/W14b-3-2023-report.pdf>

⁶ <https://documents.coastal.ca.gov/assets/la/Commission-STR-LCP-Actions-Table-April-2024.pdf>



August 4, 2025

Meagan Harmon, Chair
California Coastal Commission
455 Market Street
San Francisco, CA 94105

Via Email: ExecutiveStaff@coastal.ca.gov, CentralCoast@coastal.ca.gov

Re: Agenda Item W15a - Monterey County LCP Amendment No. LCP-3-MCO-24-0039-1 (Vacation Rentals)

Dear Chair Harmon and Commissioners,

I write on behalf of LandWatch Monterey County, a nonprofit organization that advocates for sustainability and smart growth, including the provision of adequate housing for the local workforce. LandWatch strongly supports Commission staff's recommendation to certify the County of Monterey's Implementation Plan for its Local Coastal Program regarding the regulation of short-term rentals ("STRs").

Like most of California, Monterey County suffers from a serious shortage of housing that is affordable to those who live and work in the community. When a significant portion of already limited housing is used for short-term rentals, it reduces availability and raises rents. This is especially true in the coastal zone.

The County of Monterey carefully drafted ordinances to regulate STRs, taking into consideration the diverse needs and interests of the vastly different regions of the County. The ordinances distinguish between different types of short-term housing, allowing flexibility while maintaining housing stock where the most severe housing shortages exist on the coast. Like most good legislation, the ordinances are a compromise.

LandWatch and many other community organizations have been involved with the development of these ordinances for more than 10 years. The public participation process was extensive; numerous meetings were held with community groups, the Monterey County Planning Commission, and Monterey County Board of Supervisors. County officials and staff discussed the details of proposed regulations countless times and made adjustments in response to new input and data.

Commission staff aptly note in their report that:

The County has chosen specific caps and limitations based on its years of outreach and study and based on its findings that these regulations are consistent with and adequate to carry out its LUP. There is a high level of discretion and a wide range of what can be considered reasonable to meet the objectives of providing overnight accommodations and protecting other coastal resources. And as the Commission has found in other cases, there is no 'one size fits all' vacation rental solution in coastal California. The County spent nearly a decade on an inclusive public process to arrive at this proposal, where there were and are many supporters and opponents of vacation rentals and the County's chosen approach at regulating them. The County carved out a middle ground that appears to not be wholly supported by either side, but that represents a balance based on the unique attributes of the built and natural environment of its coastal areas and the various policies of its LUPs. (CCC Staff report pp. 4-5.)

With regards to restrictions on STRs in Big Sur and the Carmel Highlands, such restrictions are necessary to address housing and resource constraints. Those constraints have been extensively debated and studied during the past 10 years, and the County has found the correct balance in its regulatory framework, one that should be respected by the Commission in recognition of work invested at the local level.

In support of concerns about the lack of housing in Big Sur, where the topography and resource constraints severely limit new construction, and its isolation presents challenges to commuters, we quote the following from the Big Sur Land Use Plan:

5.1.2. Housing ... A serious housing shortage exists for employees in Big Sur, particularly in the visitor industry. Because there is little housing available, employees have at times been forced to camp-out, live in cars, or move in with friends. The shortage of affordable housing has also made recruitment of skilled employees difficult. Several factors affect solutions to the housing problems: the costs of land and housing precludes the use of traditional housing assistance programs; and year-round employment is not at a high enough level to support traditional single and multiple family housing projects. Employee housing provided by an employer must be a primary source of affordable housing in the area. Accessory dwelling unit housing, which has traditionally provided shelter for many long-time residents and employees, will also continue to be an important element of the affordable housing supply.

The Commission staff further commented on this broader issue of housing in tourist areas:

Those visitor-serving economies are dependent on workers, who are dependent on reasonably affordable and available workforce housing. Oftentimes such workers are contributors to the communities in other ways and reflect a part of its fabric and character in that sense, as well. Thus, protecting those areas as visitor destinations implicitly requires that workforce housing also be appropriately accommodated. In addition, the public recreational opportunities that are required to be protected and enhanced by other LUP provisions can themselves necessarily only be achieved with adequate workforce housing. (CCC Staff Report p. 19.)

In sum, LandWatch supports the County's proposed regulations of STRs in the Coastal Zone as a balanced approach that protects public access to the coast while minimizing the loss of residential units to visitor-serving uses; it provides more long-term rental housing opportunities for local working families who, through their work, support public access to Big Sur and other coastal areas. We urge the Commission to certify the Implementation Plan as proposed by the County.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Delapa". The signature is fluid and cursive, with the first name "Michael" written in a larger, more prominent script than the last name "Delapa".

Michael Delapa, Executive Director
LandWatch Monterey County

SENATOR BILL MONNING (ret)
California State Senate
Majority Leader Emeritus
and
DANA KENT
24731 Crestview Circle
Carmel, CA 93923
billmonning@gmail.com

29 July 2025

Hon. Chair Harmon and Members
CALIFORNIA COASTAL
COMMISSION

Via Email

Re: August, 2025 Meeting, Calabasas, CA
Public Comment Submission: Monterey County LCP Amendment Number LCP-3-MCO-24-0039-1 (Vacation Rentals)

Dear Chair Harmon and Members:

We are longtime residents of unincorporated Carmel who live just west of Highway One in an established residential cul-de-sac. We are now surrounded by short term-vacation rental units with absentee owners, which has resulted in constant turnover, increased traffic, and the division of prior single-family residential homes into multi-unit vacation rentals.

We write **in support of the proposed LCP amendment** on short-term vacation rentals as submitted to the Coastal Commission on behalf of Monterey County.

We are supporters of the California Coastal Act and its implementation to protect coastal access for all Californians and visitors. We support the proposed ordinance and LCP amendment, as it represents a balanced approach that provides regulation of the short-term vacation rental industry including recourse for residents and property owners and protection against an unregulated industry that has impacted neighborhoods with excessive traffic; unlimited vehicle parking; conversion of residential homes to commercial properties with no density regulations; and the related impacts on infrastructure, water usage, and noise.

There are currently NO regulations, NO enforcement mechanisms, and NO constraints on the conversion of residential homes to commercial short term-vacation rentals.

It is also important to note that the protection of coastal access should not be interpreted to allow for the unregulated and unmitigated expansion of commercial properties in areas that are zoned

residential to the detriment of the coastal environment. As the staff report and prior studies confirm, there are abundant commercial rental properties available to guests with the construction of more hotels and motels in progress consistent with established zoning.

The commercial short term-rental market has also had an adverse economic impact on the local workforce, as it has removed long term-rental properties from the market, resulting in a reduction of available housing for all sectors of the workforce including service workers and professionals.

The proposed LCP amendment continues to allow for vacation rentals in most of the inhabited areas of the Coastal Zone. The proposed amendment simply brings a much-needed set of rules to guide future use and to protect and implement the goals and objectives of the Coastal Act by allowing for visitation while offering some recourse for coastal property owners and residents to seek enforcement of their rights while protecting the coastal environment.

We urge you, each and all, to respect and implement the staff recommendation for passage, as the proposal before you is the product of over a decade of work to balance the interests of property owners, residents, and visitors to the area.

We thank you for your consideration and urge your support.

Sincerely,

/s/ /s/

Senator Bill Monning (ret) and Dana Kent

From: [Martha Diehl](#)
To: [CentralCoast@Coastal](#)
Cc: [Butler, Katie@Coastal](#); [Kahn, Kevin@Coastal](#); [Ammen, Breylen@Coastal](#)
Subject: Public Comment Submission: Monterey County LCP Amendment Number LCP-3-MCO-24-0039-1 (Vacation Rentals)
Date: Friday, August 1, 2025 4:55:47 PM

Dear Chair Harmon and Commissioners,

I am writing today to ask that you approve the Monterey County vacation rental LCP amendment at your upcoming hearing. Though of course it is not perfect, it is the painstaking result of an exhaustive, open and inclusive public process to find a sensible and fair way to deal with the appropriate short term rental of residential properties in the coastal zone.

In my role as a Monterey County Planning Commissioner I have personally attended countless meetings, public workshops and public hearings about this issue since 2001. I can attest that the amendments before you reflect careful consideration of many thousands of comments from residents, visitors, property owners, businesses and public entities since then.

Your staff has provided a thorough and thoughtful analysis of the situation as it stands today. As they conclude in their staff report, the amendment before you reflects a nuanced approach to the many different issues and circumstances facing our diverse county's coastal areas. Unrestricted short term vacation rentals are demonstrably creating significant challenges for and considerable conflict within our Monterey County coastal communities today. I firmly believe these ordinances reflect the very best we can come up with to address these concerns appropriately, and that we need to begin that work yesterday.

All of us look to your Commission for help balancing protecting public access to the coast with protecting our coastal environment and communities for future generations. Please help us manage these competing priorities by approving the LCP amendment before you without delay.

Thank you for your consideration,

Martha Diehl

Martha Diehl
35811 Highway 1
Monterey, CA 93940

831.625.9621 home
831.915.7653 cell



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

August 8, 2025

Subject: Opposition to Staff Recommendation for Monterey County Vacation Rental Ordinance Update
(Agenda Item 15a, August 13, 2025 Hearing)

Dear Commissioners and staff,

On behalf of the California Short-Term Rental Association (CALSTRA), which represents tens of thousands of short-term rental operators across California, we write to express our strong opposition to the staff recommendation for the Monterey County LCP amendment, scheduled for your August 13, 2025 hearing (Agenda Item 15a). We believe this recommendation, if approved, would fundamentally undermine the California Coastal Commission's core mandate to protect and maximize public access to our precious coastline for *all* Californians.

The California Coastal Act, and by extension, this Commission, is charged with ensuring that our coastal resources, including public access and recreational opportunities, are available to people of all income levels. Your policies emphasize the importance of protecting and providing lower-cost visitor accommodations as "essential elements of coastal and park access." It is this very principle that the proposed ordinance update, as recommended by staff, directly contradicts.

Short-term rentals (STRs) in Monterey County, particularly unhosted whole-house rentals, are, in many cases, the *only* affordable option for families and individuals seeking to experience the unparalleled beauty of the Central Coast. Research cited by the [Coastal Commission](#) itself indicates that STRs currently provide a significant majority - up to 80% - of the total overnight visitor capacity in coastal areas of Monterey County, reinforcing how these rentals offer a flexible, often more economical, and family-friendly alternative to traditional accommodations (Jenkins et al., pg. 2).¹ In addition, the research indicated that: "In contrast to hotels, STRs provide a greater share of economy and midscale options, especially outside the coastal core, enhancing affordability and increasing choices for

¹ Jenkins, Sarah, et al. *Monterey County Overnight Accommodation Market Analysis*. Ceto Consulting, LLC, 2025. *Monterey County Accommodations*, <https://documents.coastal.ca.gov/reports/2025/8/w15a/W15a-8-2025-corresp.pdf>. Accessed 7 August 2025.

cost-conscious travelers and families. While coastal STRs have a higher average daily rate (ADR) due to a higher share of luxury listings, they remain more affordable on a per-guest basis because of their larger average capacity” (Jenkins et al., pg 31).²

By severely restricting or outright banning these accommodations in areas like Big Sur and Carmel Highlands, the proposed ordinance will effectively eliminate the primary source of affordable coastal accommodations, thereby diminishing public access rather than maximizing it.

We are deeply concerned by the apparent influence of affluent homeowners in communities like Big Sur and Carmel, who have actively pushed for these restrictive regulations. Their efforts don't preserve the coastal region, they privatize it, making visits to public landmarks prohibitively expensive for the average Californian. This outcome is antithetical to the spirit of the Coastal Act, which champions equitable access above exclusivity. The Commission must stand firm against such pressures and uphold its duty to the broader public good.

We urge the California Coastal Commission to reject the staff recommendation for the Monterey County Vacation Rental Ordinance Update. We are ready and willing to collaborate on solutions that protect both housing and access but scapegoating short-term rental operators in one of the most affluent regions in the country is not a solution.

Thank you for your time and consideration of this critical matter.

Sincerely,

California Short Term Rental Association

² Jenkins, Sarah, et al. *Monterey County Overnight Accommodation Market Analysis*. Ceto Consulting, LLC, 2025. *Monterey County Accommodations*, <https://documents.coastal.ca.gov/reports/2025/8/w15a/W15a-8-2025-corresp.pdf>. Accessed 7 August 2025.

From: CentralCoast@Coastal
To: [Butler, Katie@Coastal](mailto:Butler,Katie@Coastal)
Subject: Fw: Opposition to Staff Recommendation for Monterey County LCP Amendment
Date: Friday, August 8, 2025 12:32:19 PM

From: Peter Kwan <homesharersdemclub@gmail.com>
Sent: Friday, August 8, 2025 3:45 AM
To: CentralCoast@Coastal <CentralCoast@coastal.ca.gov>
Subject: Opposition to Staff Recommendation for Monterey County LCP Amendment

Dear Commissioners and staff,

Home Sharers Democratic Club is a chartered club of the San Francisco Democratic Party (HSDC). We represent hundreds of registered short-term rental hosts in San Francisco. HSDC is strongly opposed to the staff recommendation for the Monterey County LCP amendment, scheduled for your August 13, 2025 hearing (Agenda Item 15a).

One of the fundamental missions of the California Coastal Act and Commission created under it, was to maximize and ensure the equal access of all California citizens to its coastline, regardless of income levels. Your policies emphasize the importance of protecting and providing lower-cost visitor accommodations as "essential elements of coastal and park access." It is this very principle that the proposed ordinance update, as recommended by staff, directly contradicts.

Short-term rentals (STRs) in Monterey County, particularly unhosted whole-house rentals, are, in many cases, the *only* affordable option for families and individuals seeking to experience the unparalleled beauty of the Central Coast. Research cited by the [Coastal Commission](#) itself indicates that STRs currently provide a significant majority - up to 80% - of the total overnight visitor capacity in coastal areas of Monterey County, reinforcing how these rentals offer a flexible, often more economical, and family-friendly alternative to traditional accommodations. By severely restricting or outright banning these accommodations in areas like Big Sur and Carmel Highlands, the proposed ordinance will effectively eliminate the primary source of affordable coastal accommodations, thereby diminishing public access rather than maximizing it.

We are deeply concerned by the apparent influence of affluent homeowners in communities like Big Sur and Carmel, who have actively pushed for these restrictive regulations. Their efforts don't preserve the coastal region, they privatize it, making visits to public landmarks prohibitively expensive for the average Californian. This outcome is antithetical to the spirit of the Coastal Act, which champions equitable access above exclusivity. The Commission must stand firm against such pressures and uphold its duty to the broader public good.

We urge the California Coastal Commission to reject the staff recommendation for the Monterey County Vacation Rental Ordinance Update. We are ready and willing to collaborate on solutions that protect both housing and access but scapegoating short-term rental hosts in one of the most affluent regions in the country is not a solution.

Thank you for your time and consideration of this critical matter.

Sincerely,

Peter Kwan

Co-chair, Home Sharers Democratic Club.

From: CentralCoast@Coastal
To: [Butler, Katie@Coastal](mailto:Butler,Katie@Coastal)
Subject: Fw: Opposition to the staff recommendation for item 15a, the Monterey County LCP Amendment
Date: Friday, August 8, 2025 4:09:50 PM
Attachments: [08.08.25 Letter.pdf](#)

From: Pacifica for Responsible Tourism <russellj@pacificatourism.org>
Sent: Friday, August 8, 2025 2:48 PM
To: CentralCoast@Coastal <CentralCoast@coastal.ca.gov>
Subject: Opposition to the staff recommendation for item 15a, the Monterey County LCP Amendment

Dear Commissioners and Staff,

My name is Russell Jones, and I am a short-term rental host in the coastal city of Pacifica. I have seen firsthand how vacation rentals can make the California coast more accessible to people from all walks of life. That's why I am deeply concerned about the staff recommendation for the Monterey County LCP amendment scheduled for your August 13, 2025 hearing (Agenda Item 15a).

If adopted, this ordinance will drastically limit unhosted short-term rentals—eliminating one of the most important ways that families, multi-generational groups, and everyday Californians can afford to stay near our coast. In many coastal communities, including my own, STRs are not a luxury for visitors—they are often the **only affordable option**.

I can speak first hand as many of my guests are local. They are booking from the East Bay and often describe wanting to get away from the heat or wanting to spend the week with their family on the coast. They want access to affordable accommodations along the coast and most of them could not afford to visit otherwise. Another large share of my visitors are visiting family in the Bay Area and want a place in the heart of our town so they can visit beautiful hiking trails along the coast and shop at local restaurants.

Hotels, especially in high-demand areas like Big Sur or Carmel Highlands, can cost hundreds of dollars per room per night. For a family of five or six, that means paying for two or three rooms—easily doubling or tripling their lodging costs. In contrast, a vacation rental allows families to stay together, cook their own meals, and share expenses. This is exactly the type of **lower-cost visitor accommodation** the Coastal Act recognizes as essential to maximizing coastal access.

When my own sister wanted to make a surprise trip to the Bay Area, she eventually decided not to come because all of the hotels were too expensive and very shabby and run down looking.

The Coastal Commission's own research shows that STRs make up as much as **80% of overnight visitor capacity** in some parts of Monterey County's coast. Removing that capacity will not drive prices down—it will simply make visits impossible for many families, especially working-class Californians.

I also worry about the growing trend of wealthy coastal property owners pushing for these restrictions. These measures do not "protect" the coast; they effectively privatize it, reserving our shoreline for those who can already afford exclusive access. That is not in the spirit of the Coastal Act, and it is not in the interest of the broader public.

Many opponents of STR's in my town often invent horror stories about loud parties or irresponsible hosts — and I am sure that occasionally happens. I know our city already has all the authority they need to revoke licenses for bad actors, but what makes this situation difficult is the dialogue is muddled with opponents of STRs making false claims or exaggerating accusations. In our town, more than half of all complaints turn out to be neighbors harassing STR operators. And in one town meeting in our town one opponent of STR's bragged that more opponents should

be like him and call the police even if nothing is wrong just to keep STR operators on notice. This doesn't make your ruling easier as I'm sure you will probably hear similar accusations from opponents in Monterey. However ask yourselves why wouldn't a city simply revoke the STR license of such an operator — rather than simply punish all good operators by creating overly restrictive policies that are designed to drive off any and all short-term rental operators.

As a host, I take pride in welcoming visitors who come to enjoy our beaches, trails, and small businesses. Many of my guests could not afford to come if they had to stay in hotels. STRs keep the coast open, vibrant, and economically accessible—not just for tourists, but for the local communities that depend on them.

I have attached a PDF of reviews from my guests. You will countless personal accounts of how valuable short-term rentals can be. Cities should be cultivating the best operators and recognizing the value they bring to communities instead of demonizing and harassing them.

I urge you to reject this staff recommendation. Instead, let's work on fair regulations that protect housing while preserving the diverse, affordable lodging options that keep our coast truly public.

Thank you for your time and your dedication to protecting coastal access for everyone.

Sincerely,

D. Russell Jones

Pacifica for Responsible Tourism

<http://www.pacificatourism.org>

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

Dear California Coastal Commission Members,

We're writing to you because we feel strongly that short term rentals should have regulations or not be allowed in our neighborhood.

We live in the Mission Fields neighborhood of Carmel, a small, close-knit, residential community. It's one of the few neighborhoods in the area within walking distance to the local elementary school, and one of the last remaining areas in Carmel where homes are still somewhat affordable for young families. On Halloween, most of the homes (except for the Airbnb's) are fully decorated, and neighbors hand out candy to the hundreds of children from across Monterey who come to this neighborhood to trick-or-treat. This is one example to highlight what we love about our safe, family-friendly community.

When we moved here a few years ago, we chose this neighborhood because it felt like the ideal place to raise our two young sons. We live on a quiet cul-de-sac and were fortunate to have a sweet 90-year-old neighbor next door, who we quickly became close with. When she passed away, her home was sold and converted into a short-term rental. The change has been disheartening. What was once a stable, caring neighbor is now a revolving door of unfamiliar visitors.

The homes in this neighborhood are close together, and they are not designed for the constant turnover of strangers. We also have safety concerns with new people arriving and departing frequently, especially as a family with two small young children.

We want to be clear that we are not opposed to all forms of rental. For example, another neighbor rents out her ADU as an Airbnb, but she lives on the property full-time. That type of arrangement has never been an issue. What we take issue with are the absentee owners using entire homes as short-term rentals, treating our neighborhood as an investment opportunity rather than a place to live and raise families.

There is no shortage of hotels in this area to accommodate visitors, but we do have a serious shortage of housing for families. We urge you to support measures that restrict or prohibit short-term rentals in residential neighborhoods like Mission Fields.

Thank you,

Mission Fields residents

From: CentralCoast@Coastal
To: [Butler, Katie@Coastal](mailto:Butler,Katie@Coastal)
Subject: Fw: Public Comment on August 2025 Agenda Item Wednesday 15a - Monterey County LCP Amendment No. LCP-3-MCO-24-0039-1 (Vacation Rentals)
Date: Friday, August 8, 2025 12:20:54 PM
Attachments: [Long-Term Solutions to Short-Term Rentals.pdf](#)
[VRMA Economic Impact Study California-Final-UPDATED.pdf](#)
[Monterey Affordable housing draft.pdf](#)
[Tiffany Edwards Testimony CCC.pdf](#)

From: Tiffany Edwards <tiffanycoledwards@gmail.com>
Sent: Friday, August 8, 2025 12:12 PM
To: CentralCoast@Coastal <CentralCoast@coastal.ca.gov>
Subject: Public Comment on August 2025 Agenda Item Wednesday 15a - Monterey County LCP Amendment No. LCP-3-MCO-24-0039-1 (Vacation Rentals)

California Coastal Commissioners & Staff,

Hello, my name is Tiffany Edwards and for the past twelve years, my husband and I have been proud partners at Sanctuary Vacation Rentals, a short-term vacation rental company in Monterey County.

Our mission has always been to inspire and nurture the hearts and souls of our guests with exceptional hospitality through the magic of the Monterey Peninsula. We believe it is essential to work with the community to provide responsible access and safe, sustainable accommodations in the Coastal area. Our guests have always preferred and continue to seek unhosted homes and are not in the market to share living quarters with an unknown individual. We cater to families as many of our homes have multiple rooms, gathering spaces, fully equipped kitchens and essential amenities. Our company allows guests to stay without having to incur the cost of booking multiple rooms and paying for extra services, which would make the stay prohibitively expensive.

We understand the County's need to try and find a fair balance, but we do not believe the current ordinance establishes one. We ask that the Coastal Commission set a 6% cap on short-term rentals in the Coastal Zone including the Big Sur and Carmel Highlands areas. We would also ask that Monterey County include a grandfathering option for homes in good standing and meet the following criteria: have rented within the past

year, have upcoming reservations, have paid their TOT, and haven't had any code violations.

This kind of grandfathering or priority approach is already being used in other parts of California—like South Lake Tahoe, where existing operators were given priority timing to submit their application, or even San Diego, where good standing short-term rentals were scored higher in the application process.

A fair and reasonable cap could still safeguard longer term housing options without creating overnight economic harm. In 2024, Tourism Economics reported that Central Coast visitors generated \$1.7 billion in economic activity (including lodging and retail, transportation, recreation, and F&B). As highlighted in the staff analysis, this area is a premier visitor destination. Banning short-term rentals in Carmel Highlands and Big Sur would significantly reduce affordable public access to the region, ultimately driving up rental prices and making it accessible only to the wealthy.

In December 2021 RCLCO released an analysis that short-term rentals do not have a statistically significant adverse effect on Monterey County housing affordability. Instead, the housing prices were a direct result of the desirability of the area. Driving factors included overall housing market trends, migration to the area (following COVID), and the high desirability for a second home (which has historically been the case). In 2025, Orange County Grand Jury found that *“STRs have a negligible effect on affordable housing in cities that currently allow STRs...On the other hand, in coastal cities, the STR volumes appear to meet a sizable portion of affordable (accommodations) unit goals. It is therefore unrealistic to expect that coastal STRs would be converted to long-term affordable housing in any sizeable number.”*

Additionally, our owners are not in a position to convert these properties into long-term rentals. These homes are used by their owners, along with family and friends, throughout the year. Transitioning them to full-time housing would be not only impractical, but also a burdensome and

unrealistic shift for most.

I thank you for your time and consideration not only on LCP-3-MCO-24-0039-1 but for your service and commitment to California. At Sanctuary Vacation Rentals we feel privileged to be a part of such an amazing community and we are committed to work through fair and reasonable regulations. I have attached the studies referenced for your review. Please vote to restore the originally discussed 6% STR cap in the Coastal zone with grandfathering permit clause for those in good standing.

Thank you,

Tiffany Edwards

2024-2025 ORANGE COUNTY GRAND JURY REPORT



Grand Jury

Long-Term Solutions to Short-Term Rentals

TABLE OF CONTENTS

ACRONYMS 3

SUMMARY 4

BACKGROUND 4

REASON FOR THE STUDY 5

METHOD OF STUDY 5

INVESTIGATION..... 6

How Cities Manage STRs..... 7

Code Enforcement’s Role 8

STR Policies Vary in Orange County..... 8

Cities With an STR Ban 8

Cities Without a Specific STR Ordinance..... 9

How Cities Collect Complaints 9

Issues with STR Code Enforcement 9

Tools That Help Code Enforcement Accomplish Their Goals..... 10

Legal Cases Uncover Gaps in STR Ordinances 10

Managing Permit Scarcity..... 11

Collecting TOT Revenue 12

Major Events Fuel Demand for STRs..... 13

STR Impact on Affordable Housing..... 13

STRs Can be Good Neighbors..... 14

FINDINGS 15

RECOMMENDATIONS..... 16

RESPONSES 17

Responses Required 18

Findings..... 19

Recommendations..... 19

Requested Responses..... 19

Findings..... 19

Recommendations..... 19

BIBLIOGRAPHY 20
ANNOTATED BIBLIOGRAPHY 21

TABLES

Table 1: STR policies by city..... 5
Table 2: Models of short-term rentals..... 7
Table 3: Recent selected legal findings related to STRs..... 11
Table 4: STR permit limits and affordable housing needed (Housing Element)..... 14

FIGURES

Figure 1: A single residence may appear on multiple websites..... 7

ACRONYMS

ADU	Accessory Dwelling Units
CCC	California Coastal Commission
CE	Code Enforcement
GIS	Geographic Information System
HOA	Homeowners Association
LI	Low Income
OBA	Online Booking Agency
STR	Short-Term Rental
TOT	Transient Occupancy Tax
VLI	Very Low Income

SUMMARY

Short-term rental (STR) is defined as occupancy of a residence such as a home or an apartment for fewer than 30 days.

Some Orange County residents complain that the growth of STRs impinges on their quality of life and adds costs to city government for additional code enforcement. The 2024-2025 Orange County Grand Jury (Grand Jury) investigation revealed that:

- Cities with a growing number of STRs did not always receive higher complaint volumes.
- Some cities employ effective strategies to manage complaints and other cities can learn from their success.
- When cities ban STRs, this often leads to a never-ending game of “whack-a-mole”—as soon as one unpermitted STR is shut down, another opens.
- Code Enforcement (CE) errs on the side of leniency.
- Some cities rarely pursue fines for STR violations or collect the Transient Occupancy Tax (TOT) on unreported STR income.
- Some cities rely on the “honor system” for STR owners to report and pay the correct TOT.
- The commonly held belief that STRs negatively impact affordable housing is not evident in cities with STRs.

This report identifies best practices that city councils and their planning departments can use to more efficiently and effectively manage their STRs. This includes modifying STR ordinances, and for some cities, utilizing third-party digital tools for better code enforcement and data tracking to collect unreported TOT.

BACKGROUND

For many years, Orange County has been an international destination, with its forty-two miles of scenic coastline, Disneyland, Knotts Berry Farm, Angel Stadium, Honda Center, and other attractions. Vacation rental properties in Orange County’s beach communities go back many decades; for instance, in the 1920s, Crystal Cove State Park offered camping sites to the public, and in the 1940s it offered trailers.

For some, STRs are business opportunities. To others, STRs are a nuisance and impinge on neighbors’ quality of life. In response to these conflicting priorities, some cities in Orange County have banned STRs, some have limited their number, and some have no limits.

Table 1: STR policies by city

Policy Choice	Cities with the Policy
Banned (19)	Aliso Viejo, Brea, Costa Mesa, Cypress, Fountain Valley, Garden Grove, Irvine, La Habra, Laguna Hills, Laguna Niguel, Laguna Woods, Los Alamitos, Rancho Santa Margarita, Santa Ana, Stanton, Tustin, Villa Park, Westminster, Yorba Linda
Allowed (15)	Anaheim, Buena Park, Dana Point, Fullerton, Huntington Beach, La Palma, Laguna Beach, Lake Forest, Mission Viejo, Newport Beach, Orange, Placentia, San Clemente, San Juan Capistrano, Seal Beach

The advent of online booking agencies (OBAs) has made it even easier for homeowners (and apartment lessees) to supplement their income by renting out their home or room and advertising to millions around the world. As a result, STRs’ visibility has increased, creating tension between STR operators and neighbors.

REASON FOR THE STUDY

Short-term rentals are a heated topic in Orange County cities. Various news reports have covered the impact of STRs on local communities, and this motivated the Grand Jury to investigate how effectively Orange County cities are managing STRs.

The scope of this study includes the thirty-four cities in Orange County, with a focus on cities with the largest number of STRs and cities with bans on STRs, as well as coastal cities.

The Grand Jury studied STR permits and the effectiveness of STR bans. Finally, the Grand Jury examined strategies to improve the quality of life for residents and to provide city planning departments a compilation of tools that will assist in effectively balancing the expectations of the residents and the business owners operating STRs.

METHOD OF STUDY

The Grand Jury conducted the following:

- Research on STR management and business models
 - Survey of national publications with articles on STRs

- Review of websites, interviews, testimonials, and other materials produced by companies serving the STR and hospitality markets or from contractors with products for cities managing STRs
- Review of academic papers on STRs and their history
- Review of non-governmental agency white papers on STRs
- In-person interviews of city personnel
- Review of:
 - City meeting minutes and recordings of residents' concerns
 - Various cities' STR complaint processes
 - City ordinances as well as state statutes
 - California Coastal Commission guidance
 - Third-party STR surveillance software used by cities
 - Various cities' STR complaints from June 2022 through June 2024
 - Relevant legal rulings
- Analysis of TOT

INVESTIGATION

The Grand Jury learned that in most cases, STR operators are required to obtain a business license, register with their city for a permit, submit reports, pass an inspection, and pay TOT. This is a city-level tax levied on any temporary lodging that is occupied for fewer than thirty days. All hotels, motels, and bed and breakfasts must remit this tax. Short-term rentals permitting and other policies vary by city. A short-term rental's TOT is paid either monthly, quarterly, or annually. Most cities allowing STRs require a twenty-four-hour, in-person contact to address complaints, within either thirty or sixty minutes.

Short-term rental operators often use one of the numerous OBAs, such as VRBO (from the phrase Vacation Rentals by Owner), Airbnb, Zumper, and HomeAway. In addition, some operators may advertise via direct booking sites (a website for their specific property) or through local rental agents. Multiple OBAs mean that a unique property may have as many as a dozen listings.

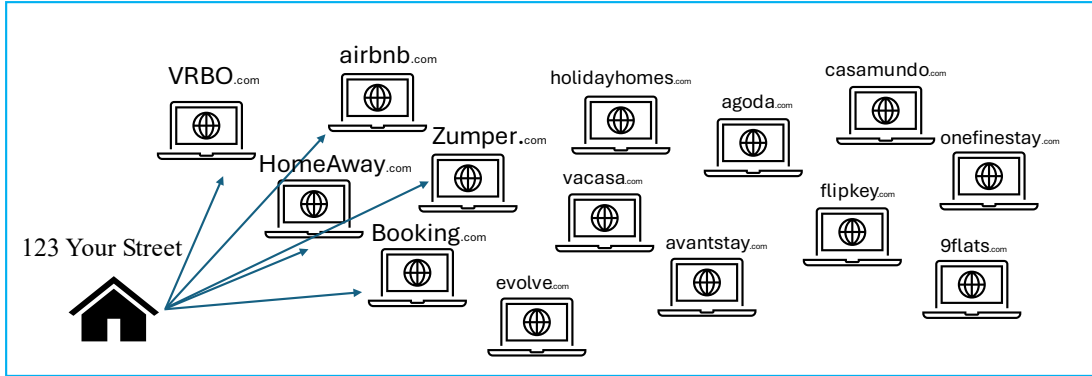


Figure 1: A single residence may appear on multiple websites.

How Cities Manage STRs

In nearly every city, short-term rentals are regulated by ordinances that define operational rules, establish fees for licensing and violations, and outline the appeals process. Often these rules include disclosure to neighbors, a “Good Neighbor Policy” brochure for the renter, parking and garbage policies, and quiet hours for the neighborhood. An emergency contact who would be readily available to respond to a complaint is typically required. City ordinances may define who can own and operate an STR. Cities may limit operation to the primary homeowner or renter, or they may allow investors who own multiple STR properties.

The Grand Jury observed the following STR models:

Table 2: Models of short-term rentals

Hosted/Shared Housing	Owner must be on the property/in house
Primary Housing	Rentals of an owner’s primary residence are permitted
Unrestricted	No restrictions on ownership (income-producing property)

The Hosted/Shared model is when a homeowner or renter with an extra room rents it out for fewer than thirty days. The host stays at the property during the guests’ stay, either in the house or in an on-property Accessory Dwelling Unit (ADU). The Primary Housing model is when the host rents out their principal home but is not present on the property. Unrestricted STRs are income-producing properties, often owned by corporations and managed by property management companies.

Regardless of the model, neighbors have the expectation that STR businesses will be operated in a responsible and respectful manner. Owner-occupied models make it easier for a neighbor with a complaint to get resolution. In cities that use this model, formal complaints are fewer because neighbors can quickly resolve issues between themselves.

Code Enforcement’s Role

Code Enforcement (CE) responsibilities include initial and ongoing inspections of STRs to assure adherence to building codes, noise and parking requirements, along with monitoring city complaint portals and searching for nonpermitted STRs. Code Enforcement officers also investigate citizen complaints to substantiate claims and issue citations.

Revenue staff work in tandem with CE to process permits and licenses and to collect TOT and other fees. In at least one city that has a waiting list for STR permits, revenue staff rather than CE staff manage the list, which may delay or limit CE’s ability to find unpermitted STRs.

Several cities employ third-party platforms offering an array of services, including STR registration portals, a complaints hotline and/or online portal, and tax payment portals. These platforms offer efficient and potentially cost-effective options to aid staff monitoring STRs. Cities may also select a third-party platform option that identifies both permitted and unpermitted STRs advertising on OBAs.

STR Policies Vary in Orange County

Each of the thirty-four cities in Orange County has its own policies. As of this writing, nineteen of the cities had a ban on all STRs and fifteen allowed STRs (see Table 1). Unincorporated areas of the county (e.g., Rossmoor, North Tustin) are covered by County of Orange policy through the OC Public Works department, which issues permits; however, the Grand Jury did not observe STR volumes in unincorporated areas warranting analysis.

Cities With an STR Ban

The Grand Jury learned that it is difficult for cities to enforce a ban. Cities report that after they enacted a ban, the volume of STRs saw a notable decline; however, some unpermitted STRs still continued to operate. Cities may use a rental identification database and a complaint portal to improve compliance, often through third-party software. These databases can often identify the address of an unpermitted STR and allow follow-up with the property owner. At least one city with technologically savvy CE staff has performed this task without help from a third-party platform.

All cities in the coastal zone have permits for STRs, and this is linked to mandates from the California Coastal Commission (CCC) which issued a 2016 memo with guidance that coastal cities provide “lower cost visitor...facilities” and beach access via STRs.

Cities Without a Specific STR Ordinance

Some cities without an STR ordinance have operated on the assumption that because STRs are not defined by an ordinance, they are banned. However, when an STR operator challenges a citation, these cities have often discovered that the subsequent court ruling goes against the city, as evidenced by recent cases described below. Cities often respond to these losses by drafting new ordinances and amendments, but sometimes a new STR operator will find another legal gap, and the “whack-a-mole” game continues.

Multi-unit apartment complexes may also host unpermitted STRs in cities that have bans. Photos used in online advertising often make complexes easy to find, but identifying specific units may be difficult. Property managers are more familiar with the units and can sometimes help CE track these down.

Some properties without permits are advertised on foreign-language websites. Image searches may uncover these host sites, but the Grand Jury did not identify any solution yet for this challenge.

How Cities Collect Complaints

Many Orange County cities provide an online complaint portal as well as a telephone hotline; these services are staffed by a third-party platform or by city staff. In cities that allow STRs, Code Enforcement will reach out to the STR emergency contact to initiate complaint resolution.

Issues with STR Code Enforcement

Most STR operators want to avoid citations and fines. Neighbor complaints can lead to notices of violation, fines, and ultimately revocation of the STR operating permit. With effective enforcement, STRs that violate city codes receive a citation and/or fine. This can result in improved behavior on the part of the STR operator.

In the fifteen cities that allow STRs, neighbors face hurdles in complaint resolution. This, along with laxity in enforcement, may explain why fewer than ten percent of STRs record a complaint in a given year, a number that fails to reflect the frustration of STR neighbors.

Tracking and confirmation of complaints is often difficult. In order to enforce STR ordinance rules, code or law enforcement must first substantiate that the source is an STR. In some cities that permit STRs, Code Enforcement works only during regular business hours. Nuisance reports often occur in the evening or early morning, when CE may not be on duty. Therefore, residents or other complainants do not receive a timely response and the problem is not resolved at the time of the actual nuisance, if ever.

Most ordinances require an emergency contact for each STR, but a review of hundreds of complaints between 2022 and 2024 shows that in a number of cases the contact does not respond either in the thirty- or sixty-minute required time frame.

Warnings and citations may take up to a week to issue and are recorded in an STR complaint log. The STR operator may appeal the citation. Initial appeals are made through a city official or a third-party administrative officer. This can take some time, during which the STR may continue to operate. An ordinance without an appeals procedure may be challenged in the courts.

The Grand Jury learned that in most cities, CE investigates complaints with a fair bit of leniency. First, the CE officer will visit the property and confirm the violation. The most common complaint is noise, and this violation must be observed and verified by the CE officer. Other complaints may involve vehicle parking, trash, and exceeding permitted occupancy. The CE officer often works through the emergency contact to resolve problems and often will issue a warning rather than a citation.

Tools That Help Code Enforcement Accomplish Their Goals

Cities that allow STRs would benefit from a system that geographically integrates STR owner contact information, permit, and business license numbers. Having this information readily available would enable CE to respond to complaints more effectively. Some of the third-party platforms offer these tools, but using a third-party platform requires a degree of technical knowledge and an investment in Code Enforcement training. Some cities accomplish this work with internal tools and staff.

Beyond responding to complaints, CE in some cities proactively inspect permitted STRs and/or confirm the emergency contacts. These inspections confirm occupancy limits, ensure that safety equipment is onsite, and validate that no unpermitted construction has been done on the property.

Legal Cases Uncover Gaps in STR Ordinances

Recent cases up and down the state have established firm guidance for cities as they deal with STR issues. The Grand Jury identified a few cases that clarified areas of ambiguity in existing STR ordinances:

Table 3: Recent selected legal findings related to STRs

<u>Case</u>	<u>Decision</u>
<u>People v. Venice Suites, LLC, 71 Cal. App. 5th 715, 732-34 (2021)</u>	Specificity in zoning language is necessary. Length of occupancy was not specified in code and therefore STR usage would be permitted.
<u>Keen v. City of Manhattan Beach, 77 Cal. App. 5th 142 (2022)</u>	The term “residence” alone is not effective in banning STRs. A specific STR ordinance is necessary.
<u>Coastal Protection Alliance Inc. v. Airbnb, Inc., 95 Cal. App. 5th 207, 270 (2023)</u>	Operation of STRs in coastal zones does not in and of itself constitute an increase in density or intensity requiring changes in zoning.
<u>Kracke v. City of Santa Barbara, 63 Cal. App. 5th 1089 (2021)</u>	Coastal cities need to secure and comply with Coastal Commission rulings before drafting any limiting ordinances pertaining to STRs.

These rulings highlight gaps in city ordinances and may provide grounds for appeal of STR citations. In light of these rulings, the cities of Anaheim and Santa Ana amended their codes to incorporate language that plugs the gaps, resulting in more effective STR enforcement.

Managing Permit Scarcity

Limits on the number of STR permits create a quasi-monopoly. In some cities, the permit limit was set at a point in time when no limit existed. The cities selected a number slightly greater than the inventory then in existence. Once the limit was set, these cities saw an acceleration in applications up to the limit.

In some cities, STRs are excluded only in certain zones. Single family home (R1) zones and Homeowner Associations (HOAs) often have exclusions. Other cities permit unlimited STRs in a “vacation home zone” near the beach or an attraction. Still others allow one STR in a fixed radius (typically 300 feet), which effectively limits permits.

At least three cities (Newport Beach, Dana Point, and Orange) have created waiting lists in response to having more applications than available permits. However, STR operators rarely voluntarily relinquish their permits. If an STR has been converted to a long-term rental, then it is no longer subject to TOT. Unless the STR operator informs the city of the conversion, a city that only collects TOT annually (as at least one city does) will not know for a year that the unit is no longer operating as an STR. At that point, as they have not received any TOT from the unit, the

city can initiate proceedings to rescind the STR permit and pass it on to the next applicant on the waiting list. However, the STR operator can appeal, and this can extend the process even longer.

Some cities allow permit holders to transfer their permit to a family member or to the new owner of their property, thus circumventing the waiting list altogether. A system where permits expire after a certain time would afford those on the waiting list an opportunity to be placed ahead of renewals, thus creating a more equitable process. One city, Dana Point, has set a limit on investor-owned properties, allowing more Hosted STRs to have priority in getting permits.

Collecting TOT Revenue

The fifteen cities that allow STRs (see Table 1) collect TOT on STR revenue, plus any fees charged to the renter. Operators report TOT to cities either annually, quarterly, or monthly. Monthly reporting of TOT has several advantages: cities receive TOT sooner, the STR owner has a smoother and more predictable cash flow, and cities can quickly identify non-revenue-producing STRs.

In cities like Dana Point and Anaheim, TOT represents a substantial percentage of city revenue; however, nearly all of this comes from hotels. Short-term rental TOT in Newport Beach represents thirty percent of total TOT collections, contributing two percent of city revenues. Newport Beach has the greatest share of TOT revenue from STRs (with 1,550 units) and the greatest number of STRs of all Orange County cities. Transient Occupancy Tax rates vary by city from eight to seventeen percent. Despite the limited amounts, each city that collects short-term rental TOT increases their general fund.

Each city handles TOT collection differently. Newport Beach collects quarterly from agents who operate STRs and annually from STR homeowners, using paper-based forms. This system does not allow for easy tracking of short-term rental TOT by permit number because multiple units at the same address (with separate permits) may be combined on the form. A digital submission by unique permit number, such as is used by the City of Orange, is easy and provides greater detail to the city.

The City of Anaheim has agreements called Voluntary Collection Agreements (VCAs) with a number of Online Booking Agency platforms that enable monthly TOT remittance from short-term rental advertising on the OBA. In most cases, OBAs share a spreadsheet with totals only; however, at least one platform remits with detailed addresses with amounts by address. It is possible for an OBA to send more detailed data and for the city to integrate it into its information systems, but as yet no city appears to have negotiated with an OBA to implement this direct reporting. Requiring an OBA to report more detail ensures that all STR tax from Online Booking Agency is reported, collected, and remitted to the city, whether the STR is permitted or not. However, this system still would not capture STRs booked directly with the operator, which may be up to 30-60% of gross rental revenue.

At least one city (Orange) requires that TOT reporting include the number of days the STR is available for rent and number of days rented each month. Capturing these statistics facilitates desk auditing.

A “desk audit” is a remote review of the STR operators’ reported information to ensure compliance with TOT reporting requirements. This is in contrast to a “business-level audit,” which is performed by the city on site and involves verification of the reported information against third-party records, such as bank statements.

The Grand Jury’s review of a subset of Orange County cities did not identify any that did more than desk audits on short-term rental TOT receipts. Put simply, these cities currently rely on the “honor system.” Conducting business-level audits would allow cities to discover and collect additional funds. However, a city should consider the cost of enforcement versus the financial benefit of STR business audits, especially in smaller cities with limited short-term rental TOT.

Major Events Fuel Demand for STRs

Reports from the 2024 Olympic games indicate that the average price per night of STRs in and around Paris more than doubled during the Olympics, and total inventory grew by nearly fifty percent. With the coming 2026 Los Angeles World Cup and the 2028 Los Angeles Olympics, these surges are likely to be seen in Orange County, especially with the Honda Center and Trestles Beach—both in Orange County—being used as Olympic venues. Orange County cities have not yet dedicated resources to plan around STRs for these major events.

STR Impact on Affordable Housing

Some housing advocates argue that STRs reduce the inventory of much needed and mandated affordable housing. The Grand Jury found that STRs have a negligible effect on affordable housing in cities that currently allow STRs. The Southern California Association of Governments, acting under the direction of the State Housing Element Law, sets a mandated volume of new units by city for Very Low Income (VLI) and Low Income (LI) units, and this analysis uses it as the estimate of needed affordable units.

The Grand Jury’s analysis of inland cities suggests that if their existing STR units were converted to affordable housing, they would contribute at most about eight percent (125/1,671 from Table 4) of the affordable units required (in the city of Orange), and a much smaller percentage in other inland cities.

On the other hand, in coastal cities, the STR volumes appear to meet a sizable portion of affordable unit goals. However, coastal cities must comply with State law enforced through the California Coastal Commission (CCC). The CCC weighs in on all coastal development and changes, and any modification of a city’s zoning rules or limits on STRs would be subject to the CCC’s approval. The CCC’s stated goal is to preserve access to public beaches and low-cost

short-term housing, which includes STRs. It is therefore unrealistic to expect that coastal STRs would be converted to long-term affordable housing in any sizeable number.

Table 4: STR permit limits and affordable housing needed (Housing Element)

	Limit on STR Permits	Housing Element 6 th Series Unit Goals		
		Very Low Income (VLI)	Low Income (LI)	VLI+LI Unit Goal
Inland Cities				
Anaheim	277	3,767	2,397	6,164
Buena Park	11	2,119	1,343	3,462
Fullerton	100	3,198	1,989	5,187
Orange	125	1,067	604	1,671
Coastal Cities*				
Dana Point	115	147	84	231
Laguna Beach	300	118	80	198
Newport Beach	1,550	1,456	930	2,386
San Clemente	225	282	164	446
Seal Beach	33	258	201	459

*Subject to CCC legal requirements

Equally important is the fact that there is rarely a one-to-one relationship between STRs and long-term housing. In many areas of the County, STRs are luxury or large-scale homes. It is extremely unlikely that such homes could or would be easily converted into affordable housing or demolished to create multiple affordable dwellings. Aside from the complications of such an endeavor, the likelihood that neighbors would acquiesce to these changes is negligible.

Based on the above factors, the Grand Jury concludes that, contrary to widely held belief, STRs should not be considered a significant factor in the availability of affordable housing in Orange County cities with STRs.

STRs Can be Good Neighbors

The burden of getting STR operators to function in a community friendly way should be on the operator and government, not the neighborhood residents. Best practices include the following:

- Updated ordinances that limit how STRs can advertise and specifically exclude STRs from banned cities
- Concise city permitting guidance

Long-Term Solutions to Short-Term Rentals

- An easy-to-use complaint system for residents
- Diligent code enforcement
- Requiring an in-person contact
- Permit numbers in all advertising
- Monthly electronic collection of TOT

Several Orange County cities, such as Seal Beach, Dana Point, and Orange, have clear permitting procedures that explicitly outline Good Neighbor policies, yielding low complaint rates. Anaheim and Santa Ana have made ordinance revisions that improve the odds that their cities will prevail in appeals to STR citations. Newport Beach, Dana Point, and Anaheim perform regular inspections on new and existing STRs to ensure units are safe and code compliant.

Incorporating the above elements in a city's ordinances and practicing effective code enforcement would enhance the relationship between STR business operators and their neighbors. Moreover, better communication among cities to share these best practices would greatly improve the management of STRs.

FINDINGS

In accordance with California Penal Code Sections 933 and 933.05, the 2024-2025 Grand Jury requires (or as noted, requests) responses from each agency affected by the findings presented in this section. The responses are to be submitted to the Presiding Judge of the Superior Court.

Based on its investigation "Long-Term Solutions to Short-Term Rentals," the 2024-2025 Orange County Grand Jury has arrived at twelve findings, as follows:

F1: Despite the increasing media coverage of Online Booking Agencies (OBAs), STRs are not a new phenomenon in Orange County.

F2: The steady growth of STR usage in the last decade raises concerns of potential public nuisance.

F3: Even with robust Code Enforcement, a city's statutory ban on STRs is not enough to keep STRs from operating.

F4: Anaheim's ordinance requires OBAs to report Transient Occupancy Tax (TOT) directly to the city. This has led to the favorable consequence that unpermitted STR income is reported to the city.

F5: Proactive home inspections of new and renewing STRs, which have been implemented in some Orange County cities, improve code enforcement and STR compliance with city ordinances.

F6: Direct remittance of taxes by OBAs does not capture all TOT for an STR because of direct booking practices.

F7: Some cities in Orange County have outdated systems for tracking short-term rental TOT making the process less effective and more difficult for staff.

F8: In some cases, STRs are improperly recharacterized as long-term rentals to circumvent the collection of TOT and any applicable penalties.

F9: Online Booking Agencies in foreign languages are outside the current capabilities of Code Enforcement to monitor and track unpermitted STRs.

F10: Cities that fail to routinely review their STR waiting lists potentially lose TOT revenue and contribute to a greater prevalence of unpermitted STRs.

F11: Locations that have hosted major events have reported an outsized increase in demand and pricing of STRs, a situation Orange County is likely to experience with the upcoming 2026 Los Angeles World Cup and 2028 Los Angeles Olympics.

F12: City leaders have no regular communication with each other concerning STR issues, limiting opportunities to develop strategies and expertise to improve service.

RECOMMENDATIONS

In accordance with California Penal Code Sections 933 and 933.05, the 2024-2025 Grand Jury requires (or, as indicated, requests) responses from each agency affected by the recommendations presented in this section. The responses are to be submitted to the Presiding Judge of the Superior Court.

Based on its investigation described herein, the 2024-2025 Orange County Grand Jury makes the following nine recommendations:

R1: Cities should review and begin to update ordinances to keep up with the rapidly changing nature of court findings and legislation related to STRs, by December 31, 2025, and no less frequently than every three years thereafter. **(F4, F12)**

R2: Cities should consider developing a plan for upcoming major events that are expected to create a surge in demand for STRs and its associated Transient Occupancy Tax, by December 31, 2025, and no less frequently than every two years thereafter. **(F11)**

R3: Cities that allow STRs should evaluate the benefit of ordinances facilitating Voluntary Collection Agreements requiring OBAs to submit TOT directly, by June 30, 2026. (F4, F12)

R4: Cities that allow STRs should evaluate the benefit of collecting TOT on a monthly basis by individual property, by June 30, 2026. (F7, F8)

R5: Cities should require STRs to include the number of days rented per month per permit to facilitate short-term rental TOT desk audits by November 30, 2025. (F7, F8)

R6: Cities with a permit waiting list should implement strategies to remove non-revenue-generating licenses to allow for fair access by December 31, 2025, and annually thereafter. (F7, F10)

R7: Cities that allow STRs should consider allocating resources to update their short-term rental TOT tracking systems by September 30, 2026. (F7, F8, F10)

R8: Cities that allow STRs should consider random multi-year audits to confirm TOT by June 30, 2026, and annually thereafter. (F6, F7, F8)

R9: City leaders should have regular discussions with each other to share STR management strategies on a biannual basis commencing no later than January 1, 2026. (F12)

RESPONSES

The following excerpts from the California Penal Code provide the requirements for public agencies to respond to the Findings and Recommendations of this Grand Jury report:

Penal Code Section 933:

*(c) No later than **90 days** after the grand jury submits a final report on the operations of any public agency subject to its reviewing authority, the **governing body of the public agency** shall comment to the presiding judge of the superior court on the findings and recommendations pertaining to matters under the control of the governing body, and every **elected county officer or agency head** for which the grand jury has responsibility pursuant to Section 914.1 shall comment within **60 days** to the presiding judge of the superior court, with an information copy sent to the board of supervisors, on the findings and recommendations pertaining to matters under the control of that county officer or agency head and any agency or agencies which that officer or agency head supervises or controls. In any city and county, the mayor shall also comment on the findings and recommendations. All of these comments and reports shall forthwith be submitted to the presiding judge of the superior court who impaneled the grand jury. A copy of all responses to grand jury reports shall be placed on file with the clerk of the public agency and the office of the county clerk, or the mayor when applicable, and shall remain on file in those offices. One copy shall be placed on file with the applicable grand jury final report by, and in the control of the currently impaneled grand jury, where it shall be maintained for a minimum of five years.*

Penal Code Section 933.05:

(a) For purposes of subdivision (b) of Section 933, as to each grand jury finding, the responding person or entity shall indicate one of the following:

(1) The respondent agrees with the finding.

(2) The respondent disagrees wholly or partially with the finding, in which case the response shall specify the portion of the finding that is disputed and shall include an explanation of the reasons therefor.

(b) For purposes of subdivision (b) of Section 933, as to each grand jury recommendation, the responding person or entity shall report one of the following actions:

(1) The recommendation has been implemented, with a summary regarding the implemented action.

(2) The recommendation has not yet been implemented, but will be implemented in the future, with a timeframe for implementation.

(3) The recommendation requires further analysis, with an explanation and the scope and parameters of an analysis or study, and a timeframe for the matter to be prepared for discussion by the officer or head of the agency or department being investigated or reviewed, including the governing body of the public agency when applicable. This timeframe shall not exceed six months from the date of publication of the grand jury report.

(4) The recommendation will not be implemented because it is not warranted or is not reasonable, with an explanation therefor.

(c) However, if a finding or recommendation of the grand jury addresses budgetary or personnel matters of a county agency or department headed by an elected officer, both the agency or department head and the board of supervisors shall respond if requested by the grand jury, but the response of the board of supervisors shall address only those budgetary or personnel matters over which it has some decision-making authority. The response of the elected agency or department head shall address all aspects of the findings or recommendations affecting his or her agency or department.

(d) A grand jury may request a subject person or entity to come before the grand jury for the purpose of reading and discussing the findings of the grand jury report that relates to that person or entity in order to verify the accuracy of the findings prior to their release.

(e) During an investigation, the grand jury shall meet with the subject of that investigation regarding the investigation, unless the court, either on its own determination or upon request of the foreperson of the grand jury, determines that such a meeting would be detrimental.

(f) A grand jury shall provide to the affected agency a copy of the portion of the grand jury report relating to that person or entity two working days prior to its public release and after the approval of the presiding judge. No officer, agency, department, or governing body of a public agency shall disclose any contents of the report prior to the public release of the final report.

Responses Required

Comments to the Presiding Judge of the Superior Court in compliance with Penal Code Section 933.05 are required within 90 days of the date of the publication of this report from:

Findings

City Councils of the following cities:

Dana Point, Fullerton, Huntington Beach, Laguna Beach, Newport Beach, San Clemente, San Juan Capistrano, Seal Beach F1, F2, F5, F6, F7, F8, F9, F10, F11, F12

Costa Mesa, Irvine, Santa Ana F1, F2, F3, F12

Anaheim F1, F2, F4, F5, F6, F7, F8, F9, F11, F12

Recommendations

City Councils of the following cities:

Anaheim, Dana Point, Fullerton, Huntington Beach, Laguna Beach, Newport Beach, Orange, San Clemente, San Juan Capistrano, Seal Beach R1, R2, R3, R4, R5, R6, R7, R8, R9

Costa Mesa, Irvine, Santa Ana R1, R2, R9

Requested Responses

Comments to the Presiding Judge of the Superior Court in compliance with Penal Code Section 933.05 are requested within 90 days of the date of the publication of this report from:

Findings

City Councils of the following cities:

Buena Park, La Palma, Lake Forest, Mission Viejo, Placentia F1, F2, F5, F6, F7, F8, F9, F10, F11, F12

Aliso Viejo, Brea, Cypress, Fountain Valley, Garden Grove, La Habra, Laguna Hills, Laguna Niguel, Laguna Woods, Los Alamitos, Rancho Santa Margarita, Stanton, Tustin, Villa Park, Westminster, Yorba Linda F1, F2, F3, F12

Recommendations

City Councils of the following cities:

Buena Park, La Palma, Lake Forest, Mission Viejo, Placentia R1, R2, R3, R4, R5, R6, R7, R8, R9

Aliso Viejo, Brea, Cypress, Fountain Valley, Garden Grove, La Habra, Laguna Hills, Laguna Niguel, Laguna Woods, Los Alamitos, Rancho Santa Margarita, Stanton, Tustin, Villa Park, Westminster, Yorba Linda

R1, R2, R9

BIBLIOGRAPHY

Better Neighbors LA. "BNLA Annual Report 2022." February 24, 2023. https://static1.squarespace.com/static/5fc9845732f65217775cb3a5/t/63f8e87357c81b184848b95b/1677256830192/BNLA_Annual+Report_2022-web.pdf.

California Coastal Commission. "Short Term Vacation Rental Memo to Coastal Planning and Development Directors." December 6, 2016. https://documents.coastal.ca.gov/assets/la/Short_Term_Vacation_Rental_to_Coastal_Planning_&_Devt_Directors_120616.pdf.

California Coastal Commission. "Recent LCP Policy Examples for Lower Cost Overnight Accommodations." 2023. <https://documents.coastal.ca.gov/assets/lower-cost-coastal-lodging/LCOA-Doc2.pdf>.

Costar. "Summer Olympics Drove Paris Room Rates to All-Time Highs." *CoStar*, August 11, 2024. <https://www.costar.com/article/54408592/summer-olympics-drove-paris-room-rates-to-all-time-highs>.

Dubetz, Alissa, Matt Horton, and Charlotte Kesteven. "Staying Power: The Effects of Short-Term Rentals on California's Tourism Economy and Housing Affordability." Milken Institute, June 1, 2022. <https://milkeninstitute.org/content-hub/research-and-reports/reports/staying-power-effects-short-term-rentals-californias-tourism-economy-and-housing-affordability>

Humphreys, Lucy. "Regulating Short-Term Rentals in California's Coastal Cities: Harmonizing Local Ordinances with the California Coastal Act." *Loyola of Los Angeles Law Review* 52 (2019): 309.

Jin, Ginger Zhe, Liad Wagman, and Mengyi Zhong. "The Effects of Short-term Rental Regulation: Insights from Chicago." November 19, 2023. SSRN. <https://ssrn.com/abstract=4638022> or <http://dx.doi.org/10.2139/ssrn.4638022>.

Reinhard, D., and J.J. Roth. "Renting Trouble? An Analysis of Crime and Calls to Police at Addresses with Different Rental Types." *Crime Science* 13, no. 35 (2024). <https://doi.org/10.1186/s40163-024-00232-8>.

Safely. "The Best Alternatives to Airbnb and VRBO: The Rise of the Niche Platforms." Safely, February 17, 2025. <https://safely.com/articles/the-best-alternatives-to-airbnb-and-vrbo-the-rise-of-the-niche-platforms/>.

Thompson, Robert. "Affordable Twenty-Four Hour Coastal Access: Can We Save a Working Stiff's Place in Paradise?" *Ocean and Coastal Law Journal* 12, no. 1 (2006). <https://digitalcommons.maine.gov/oclj/vol12/iss1/5/>.

Urevich, Robin. "Is My Short-Term Los Angeles Rental Legal?" ProPublica, September 3, 2024. <https://www.propublica.org/article/is-my-short-term-los-angeles-rental-legal>.

Wachsmuth, David, and Danielle Kerrigan. "Short-Term Rentals in Los Angeles: 2022 Report." Urban Politics and Governance Research Group, McGill University, 2022. https://upgo.lab.mcgill.ca/publication/strs-in-los-angeles-2022/Wachsmuth_LA_2022.pdf.

ANNOTATED BIBLIOGRAPHY

Airbnb. "Vacation Rentals, Homes, Experiences & Places." Airbnb.com. Accessed January 6, 2025. <https://www.airbnb.com>.

Leading booking platform for STRs.

AirDNA. "Short-Term Rental Data & Analytics." AirDNA.co. Accessed January 6, 2025. <https://www.airdna.co>.

Platform that tracks the STR market, claiming listings of ten million properties that are then linked to partner data to detect reservations and calculate market performance. Market-level volumes are reported with projections. Subscriptions allow for detailed searching and market reports.

Booking.com. "Booking.com: Hotels, Apartments, Villas, Hostels & More." Booking.com. Accessed January 6, 2025. <https://www.booking.com>.

Leading booking platform includes hotels and STRs.

Deckard. "Deckard Technologies." Deckard.com. Accessed January 6, 2025. <https://www.deckard.com>.

Owner of Rentalscape product, a third-party platform working with cities, offering STR detection with address identification, complaint platform (call-center, web reporting), and tax collection.

Granicus. "Host Compliance." Granicus.com. Accessed January 6, 2025. <https://granicus.com/product/host-compliance/>.

Third-party platform working with cities offering STR detection, a complaint platform and tax collection. Host Compliance product recently integrated into Granicus.

Long-Term Solutions to Short-Term Rentals

Rabbu. “Short-Term Rental Property Management.” Rabbu.com. Accessed January 6, 2025. <https://rabbu.com>.

One of several investment platforms that does market analysis for STR buyers.

STR. “Hotel Industry Data & Benchmarking.” STR.com. Accessed January 6, 2025. <https://www.str.com>.

Part of the Costar Group of real estate data companies; tracks data on hospitality markets with a primary focus on hotels, but STR data such as prices and volumes are also tracked.

Vacasa. “Vacation Rentals.” Vacasa.com. Accessed January 6, 2025. <https://www.vacasa.com>.

Vacation rental management and booking site. Provides services to owners and customers.

VRBO. “Vacation Rentals by Owner.” VRBO.com. Accessed January 6, 2025. <https://www.vrbo.com>.

Leading booking platform, part of Expedia travel group. Integrated Home Away in 2019.

Zumper. “Apartments for Rent.” Zumper.com. Accessed January 6, 2025. <http://zumper.com>.

One of many aggregating sites for rentals across platforms. Limits searches to strict city boundaries when searching.



TOURISM
ECONOMICS

AN OXFORD ECONOMICS COMPANY

ECONOMIC IMPACT OF CALIFORNIA SHORT-TERM VACATION RENTALS 2022

August 2023

Prepared for: Vacation Rental Management Association (VRMA)





CONTENTS

Introduction Methodology & data sources	03
Key Findings Summary economic & fiscal impacts	04
Visits & Visitor Spending Size and scope of short-term vacation rental stays, visitors, and revenues, both inside and outside of accommodations	05
Economic Impact Methodology Impact model framework	06
Combined Economic Impact Business sales, jobs, and labor income impacts driven by accommodations revenues and visitor spending	07
Accommodations Economic Impact Business sales, jobs, and labor income impacts driven by accommodations revenues and property manager and host spending	08
Other Guest Spending Business sales, jobs, and labor income impacts driven by guest spending outside of accommodations	09
Regional Snapshots Snapshots of the economic impact of rentals across six California regions	11
Appendix Definitions of key terms, and overview of of methodological approach.	25



INTRODUCTION

PROJECT BACKGROUND

Short-term vacation rentals (STVRs) provide significant economic value to the state of California, with property managers, hosts and their guests providing sizable contributions to the state economy. California STVR visitors spent \$19.4 billion on accommodations and other spending in 2022, benefitting households, businesses, and governments alike.

By monitoring the size, scope, and impact of the STVR visitor economy, California policymakers gain important context on the sector and its broader role in local economies throughout the state.

The Vacation Rental Management Association (VRMA) engaged Tourism Economics to quantify the significance of the STVR visitor economy to California. The results of this study show the significant scope of the California STVR economy in terms of direct visitor spending and downstream property manager and host spending, along with total economic impacts, jobs, and fiscal (tax) impacts in the broader economy.

METHODOLOGY AND DATA SOURCES

To quantify the significance of the STVR visitor economy to California, Tourism Economics developed a comprehensive model detailing the far-reaching impacts arising from the spending of property managers and hosts and visitors.

STVR visitors are defined as those who stayed in short-term vacation rentals, including units listed on Airbnb, VRBO, and other online travel agencies or listed brokered properties. Visitor spending is defined as the amount spent on accommodations, as well as non-accommodations spending in the local area, such as at restaurants and recreation venues. As part of the analysis, Tourism Economics prepared estimates of STVR operating characteristics that were confirmed for reasonability with industry participants.

The analysis draws on the following data sources:

- Key Data Dashboard: STVR scope and performance data for the state of California for calendar year 2022. Includes room demand, room rates, total room revenue, and bedrooms booked.

- US Census: seasonal second homes inventory and other housing attributes, including housing pricing and value
- Longwoods International: survey data providing visitor profile characteristics for California visitors staying in STVRs. Includes spending on and outside of STVR accommodations, travel party size, and length of stay.

An IMPLAN input-output model was constructed for both property managers and hosts and guests of STVR in California. The model traces the flow of visitor and property manager and host-related expenditures through the California economy and the effects on employment, wages, and taxes. IMPLAN also quantifies the indirect (supplier) and induced (income) impacts of tourism. Tourism Economics then cross-checked these findings with employment and wage data for each sector to ensure the findings are within reasonable range.

ECONOMIC IMPACTS

KEY FINDINGS

COMBINED ECONOMIC IMPACT

The combined impact of short-term vacation rentals (STVRs) and their guests drove \$34.4 billion in business sales in the state of California, supporting 163,929 jobs and generating \$3.7 billion in state and local tax revenues.

This analysis segments the economic impact of California STVRs into two categories:

- **Accommodations revenue & property manager and host spending:** the revenue associated with STVRs and the downstream impacts of property managers and hosts spending revenues
- **Other guest spending:** visitor spending outside of STVRs in the local economy

ACCOMMODATIONS REVENUE & PROPERTY MANAGER AND HOST SPENDING

In 2022, 23.4 million overnight visitors spent \$8.6 billion on STVRs during 6.4 million trips. Stays at STVRs occupied 28.1 million room nights across 224,700 listed properties and drove \$19.4 billion in total business sales, supporting 28,423 total jobs and \$1.5 billion in lodging tax collections for the state and local governments.

OTHER GUEST SPENDING

The 23.4 million California visitors staying in STVRs spent more outside of their accommodations than they did on or inside them. STVR guests spent \$10.9 billion across the food and beverage, retail, transportation, and recreation sectors, creating \$19.0 billion in total economic value. This other, non-lodging, guest spending supported 135,505 total jobs and drove \$1.8 billion in state and local tax revenues.



\$19.4B

Total Direct
Visitor Spending



\$34.4B

Total
Economic
Impact



163,929

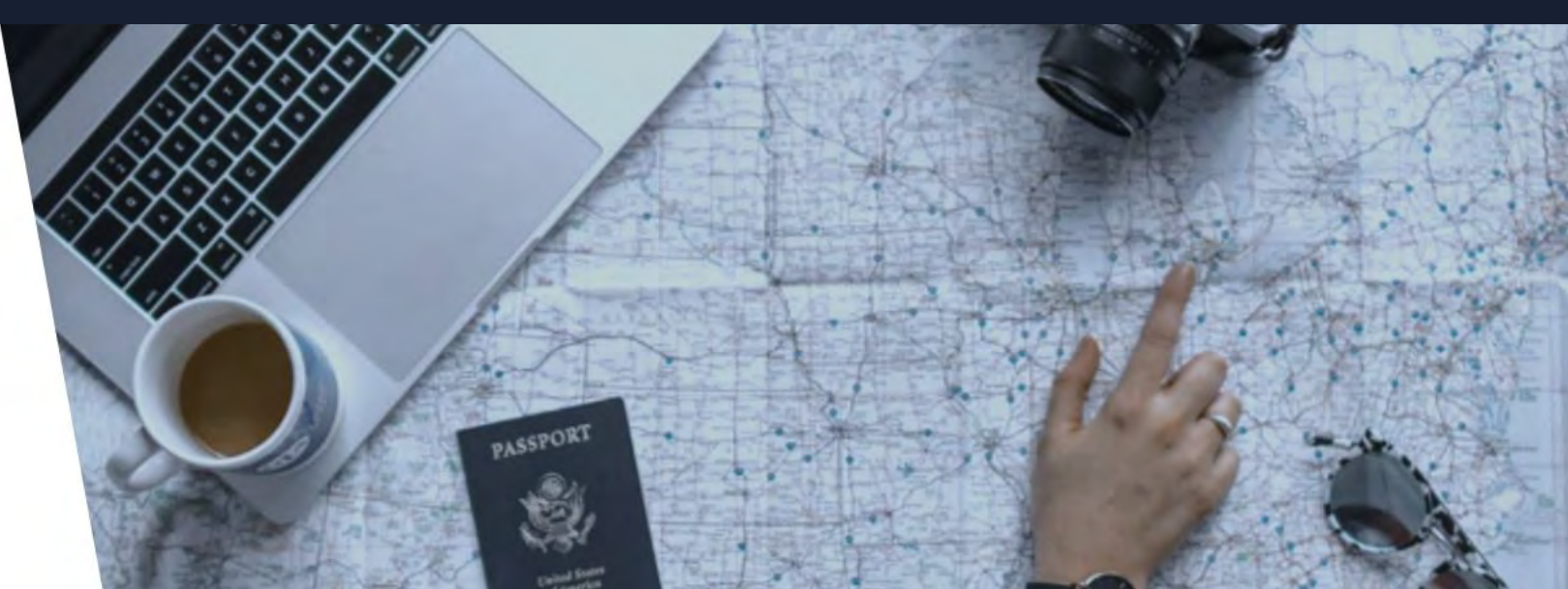
Total
Jobs
Supported



\$3.7B

State & Local
Taxes
Generated

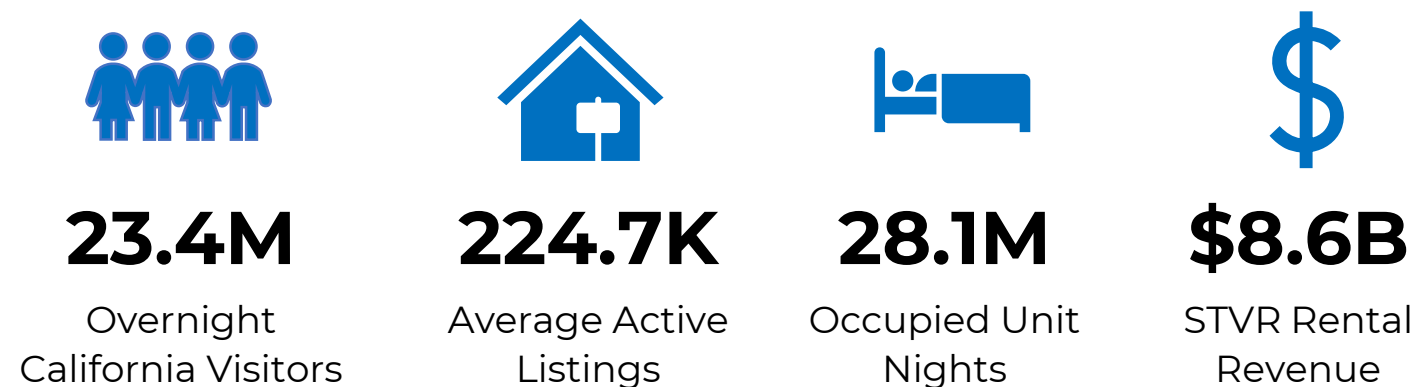




VISITS & VISITOR SPENDING

Across a range of destinations and seasons, STVRs provide places to stay for California visitors, including residents traveling in-state as well as visitors from out-of-state and abroad. In 2022, 224,700 STVR units hosted 6.4 million trips to and within the state of California, accommodating 23.4 million visitors. Altogether, STVR visitors spent \$8.6 billion on California stays in 2022.

CALIFORNIA STVR VISITOR LEVEL



Sources: Longwoods International, KeyData Dashboard, Tourism Economics

OTHER GUEST SPENDING

For every \$100 spent on STVRs, guests spent \$127 outside of their accommodations

STVR guests typically spent more at local businesses than on vacation rentals. In general, STVR guest spending represents less than half (44%) of overall STVR guest spending.

Nearly 37% of guests non-lodging spending occurred in the food and beverage sector, driving \$4.0 billion to California's restaurants, bars, and grocery stores.

Retail spending accounted for 27% of other guest spending in California, including spending on souvenirs, general merchandise, local retailers, and malls.

STVR guests spent \$2.1 billion on local transportation in California, including taxis, rental cars, and rideshare services, and spent \$2.1 billion in the recreation sector.

Altogether, in 2022, STVR guests drove \$10.9 billion in direct visitor spending.

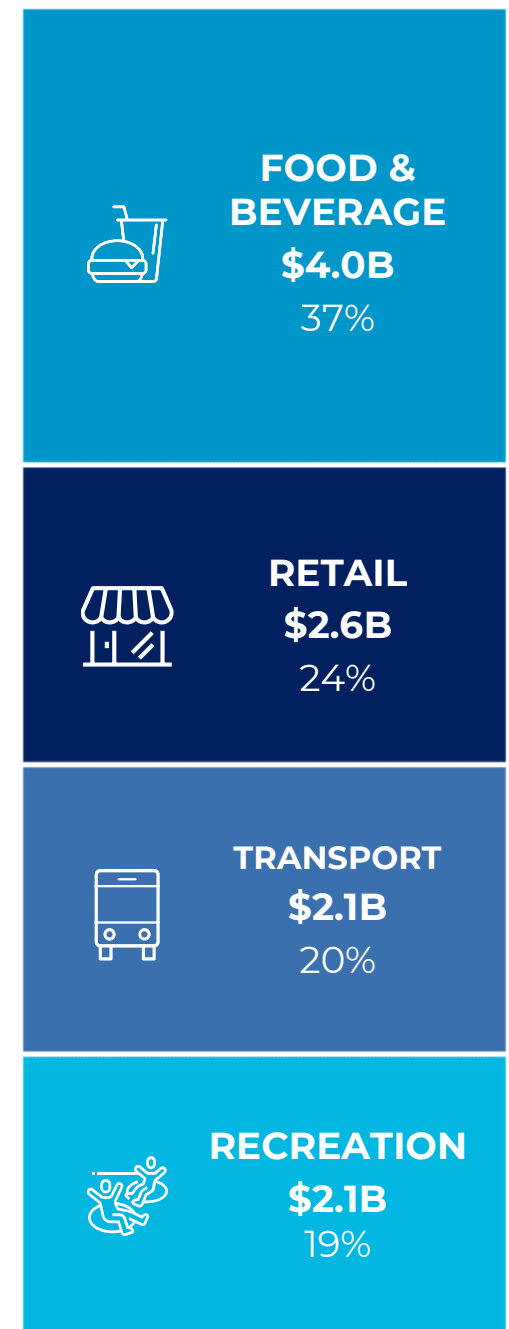


\$19.4 BILLION

Total Direct Spending from STVR Guests in California

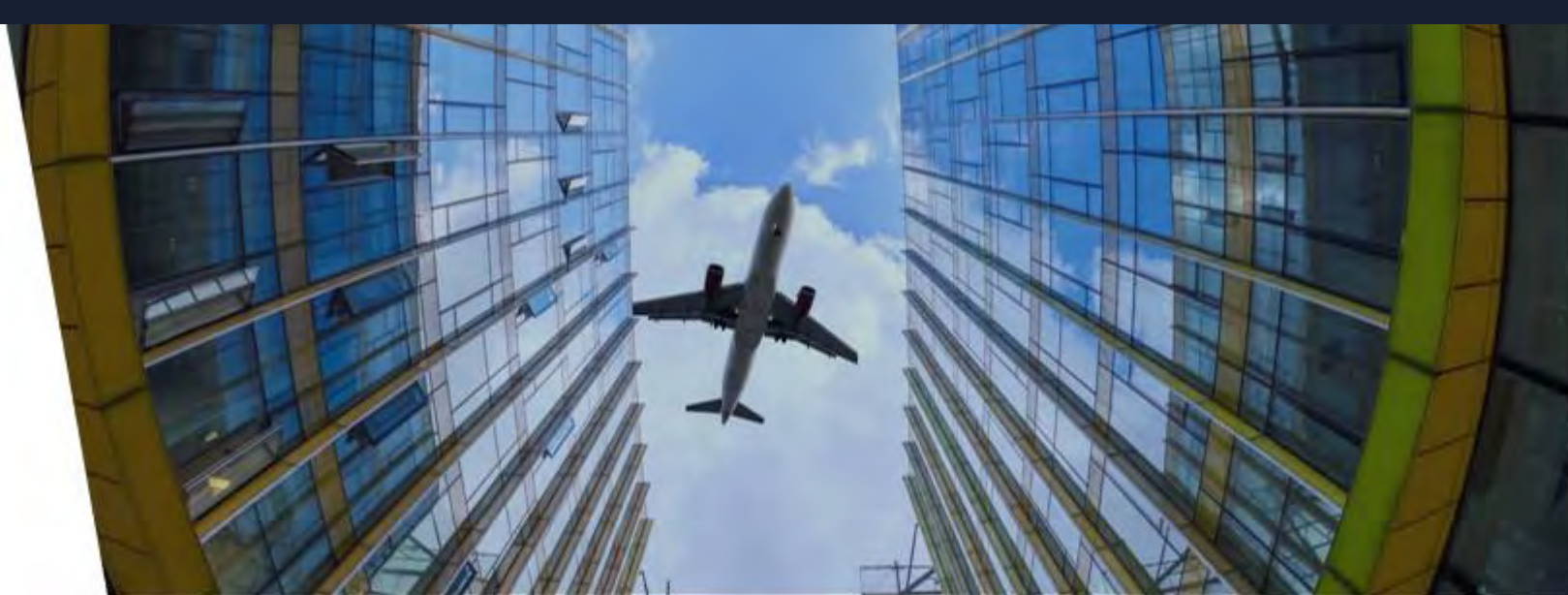
\$10.9 BILLION

California Other Guest Spending



Source: Longwoods International, Tourism Economics

Note: Transport only includes local transportation within the destination



ECONOMIC IMPACT METHODOLOGY

Our analysis of STVR guests in California begins with direct visitor spending and analyzes the downstream effects of this spending on the broader economy. To determine total economic impact, we input direct guest spending into a model of the California economy, constructed using an IMPLAN input-output (I-O) model. The model traces the full extent of industry impacts as dollars flow through the local economy.

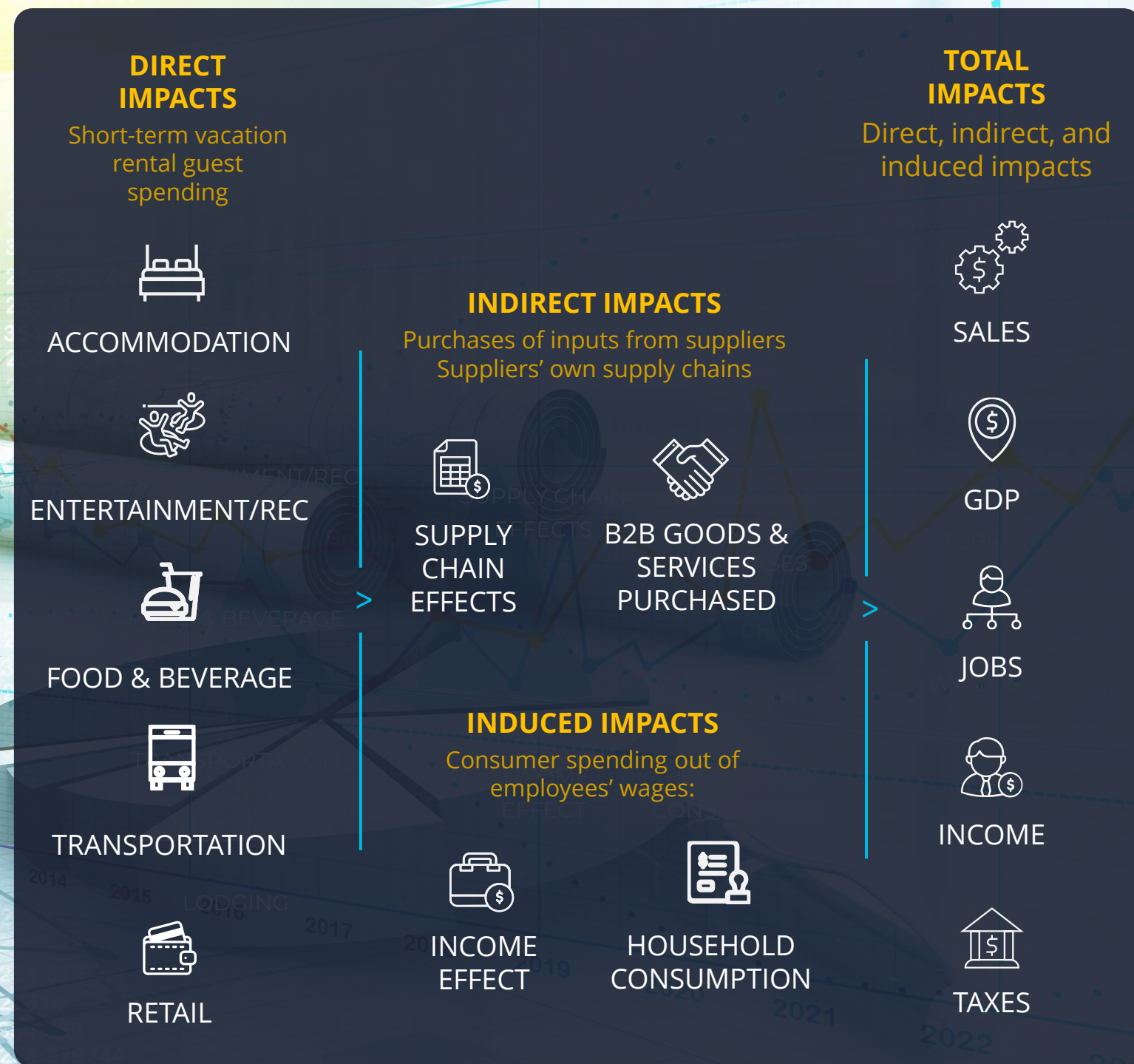
An I-O model represents a profile of an economy by measuring the relationships among industries and consumers and quantifies three levels of impact:

- 1. Direct impacts:** Visitor spending creates direct economic value within a discrete group of sectors (such as recreation and transportation). This supports a relative proportion of spending, jobs, wages, and taxes within each sector.
- 2. Indirect impacts:** Each directly affected sector also purchases goods and services as inputs (e.g., food wholesalers, utilities) into production. These impacts are called indirect impacts or supply-chain effects.
- 3. Induced impacts:** Lastly, the induced impact is generated when employees whose wages are generated either directly or indirectly by visitor spending spend those wages in the local economy. This is called the induced impact or income effect.

The Tourism Economics model calculates these three levels of impact - direct, indirect and induced - for a broad set of indicators, including:

- Spending
- Wages
- Employment
- State Taxes
- Local Taxes

ECONOMIC IMPACT FRAMEWORK



ECONOMIC IMPACT COMBINED IMPACTS

Total Combined Impacts

Monetary amounts in millions; 2022

Total Vacation Rental Impact				State & Local Fiscal Impact
	Business Sales	Labor Income	Employment	
Direct Guest Spending	\$19,446	\$4,948	104,884	\$2,729
Indirect / Induced Impacts	\$14,920	\$4,098	59,044	\$997
Total	\$34,365	\$9,046	163,929	\$3,726

Accommodations Spending & Property Manager and Host Spending				State & Local Fiscal Impact
	Business Sales	Labor Income	Employment	
Accommodations Spending	\$8,571	\$1,387	11,826	\$1,690
Indirect / Induced Impacts	\$6,795	\$1,269	16,597	\$273
Total	\$15,367	\$2,656	28,423	\$1,963

Other Guest Spending				State & Local Fiscal Impact
	Business Sales	Labor Income	Employment	
Other Guest Spending	\$10,874	\$3,561	93,058	\$1,039
Indirect / Induced Impacts	\$8,124	\$2,829	42,447	\$724
Total	\$18,999	\$6,390	135,505	\$1,763

In total, California visitors' spending on STVRs as well as non-lodging categories (retail, transportation, recreation, and food and beverages) generated \$34.4 billion in sales at California businesses in 2022.

Direct guest spending on accommodations and other guest-facing industries drives significant induced and indirect sales and employment in a range of industries including finance, insurance, real estate, and business services.



ECONOMIC IMPACT

ACCOMMODATIONS REVENUE, PROPERTY MANAGER AND HOST SPENDING

Accommodations Spending Impacts

Monetary amounts in millions; 2022

	Economic Impacts			State & Local Fiscal Impacts				
	Business Sales	Labor Income	Employment	Lodging*	Sales	Property	Other	Total
Accommodations Spending	\$8,571	\$1,387	11,826	\$1,523	\$82	\$34	\$51	\$1,690
Indirect / Induced Impacts	\$6,795	\$1,269	16,597	\$0	\$143	\$59	\$71	\$273
Total Impacts	\$15,367	\$2,656	28,423	\$1,523	\$224	\$94	\$121	\$1,963

Source: Tourism Economics

*State & Local direct taxes of \$1.5 billion are lodging tax revenues for the state of California and locality occupancy taxes.

ACCOMMODATIONS SPENDING

DIRECT IMPACTS

The \$8.6 billion spent by visitors supported 11,826 people in direct service roles, including various cleaning and ancillary services. As STVRs represent an important source of income for many property managers and hosts, their income has been included in direct labor income. Property management and host STVR roles have not been counted as direct jobs, to be conservative, as some are secondary employment. Revenues from STVRs directly contributed \$34 million to property tax collections, and \$1.5 billion in state and local lodging tax collections.

PROPERTY MANAGER AND HOST SPENDING

INDIRECT & INDUCED IMPACTS

STVR hosts, as well as service providers such as cleaning and property management services, purchase inputs from other California businesses. These supply chain effects are referred to as indirect impacts. Example purchases include:

- Utilities, including electrical, water, cable, and internet services
- Cleaning supplies
- Maintenance products & services, performed both by property managers and hosts themselves and by professional construction & renovation services
- Consumable items for guests, including linens, soap, and groceries, among others

As STVR property managers and hosts and service providers spend a portion of their income in California, it supports additional impacts referred to as induced effects. Altogether, the \$15.4 billion in economic activity driven by STVR accommodations spending supported 28,423 California jobs, paying \$2.7 billion in labor income.





ECONOMIC IMPACT OTHER GUEST SPENDING

Summary economic impacts

Monetary amounts in millions; 2022

	Economic Impacts			State & Local Fiscal Impacts			
	Business Sales	Labor Income	Employment	Sales	Property	Other	Total
Other Guest Spending	\$10,874	\$3,561	93,058	\$619	\$206	\$214	\$1,039
Indirect / Induced Impacts	\$8,124	\$2,829	42,447	\$413	\$138	\$173	\$724
Total Impacts	\$18,999	\$6,390	135,505	\$1,031	\$345	\$387	\$1,763

Source: Tourism Economics

Statewide, STVR guests spent \$10.9 billion outside of accommodations during the analysis period. STVR guest spending supports key areas of the California economy through business sales, employment opportunities, and tax revenues.

The \$10.9 billion of STVR guest spending in non-lodging categories generated an additional \$8.1 billion in indirect and induced impacts throughout the California economy. Indirect and induced business sales are generated in industries that are not directly visitor facing, as visitor-facing businesses purchase goods and services, and additionally employ workers who then spend earnings in their daily lives.

STVR visitor spending outside of accommodations directly supported 93,058 jobs, rising to 135,505 when indirect and induced impacts are included. Additionally, visitors supported \$6.4 billion in wages outside of accommodations spending.

ECONOMIC IMPACTS IN CONTEXT



\$53 MILLION IN VISITOR SPENDING PER DAY

Short-term vacation rental guests spend \$53 million per day in California.



\$255 TAX SAVINGS

The \$3.7 billion in state and local tax revenues generated by short-term vacation rentals and their guests is the equivalent of a \$255 state and local tax offset for every California household.



39 STAYS = ONE JOB

Each short-term vacation rental stay drives \$3,048 in visitor spending. Overall, this means that for every 39 STVR stays, one California job is supported.



\$16,578 STATE & LOCAL TAXES PER UNIT

The economic activity associated with California short-term vacation rentals and their guests brought in \$16,578 in state and local tax revenue per STVR listing.

An aerial photograph of a rugged coastline. The foreground shows dark, jagged rock formations with white foam from crashing waves. The middle ground features a wide, sandy beach area with some green patches, bordered by steep, brownish cliffs. The ocean is a vibrant turquoise color, extending to the horizon. The sky is clear and blue.

REGIONAL SNAPSHOTS

REGIONAL COMPOSITION

REGIONAL ANALYSIS

To quantify the importance of the STVR visitor economy across California, we defined six study regions. Detailed results on STVR guest activity and associated economic impacts within each region are presented in this section.

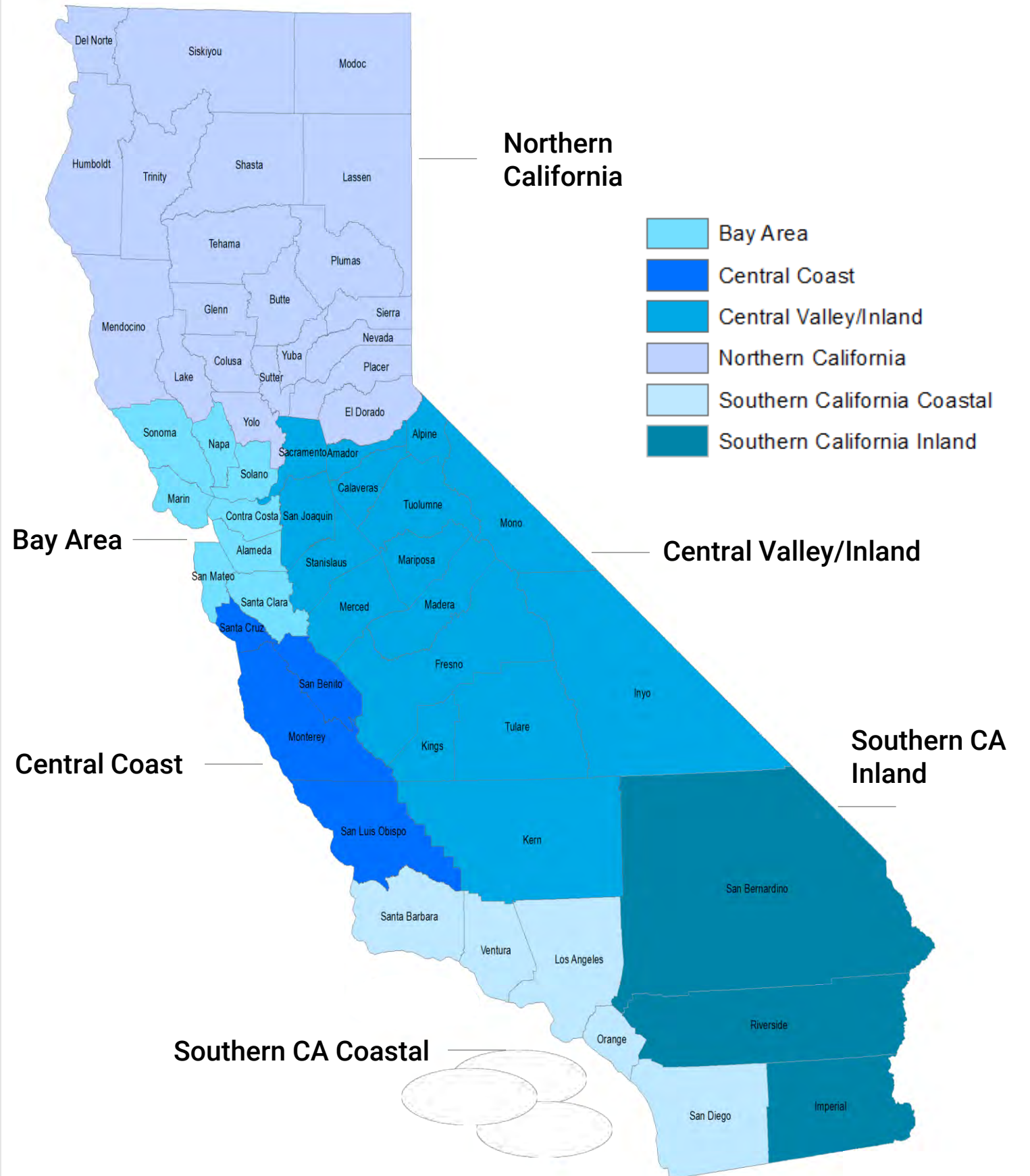
Six regions

Each study region is defined as a set of counties:*

- **Northern California:** Butte, Colusa, Del Norte, El Dorado, Glenn, Humboldt, Lake, Lassen, Mendocino, Modoc, Nevada, Placer, Plumas, Shasta, Sierra, Siskiyou, Sutter, Tehama, Trinity, Yolo, Yuba
- **Southern California Inland:** Imperial, Riverside, San Bernardino
- **Southern California Coastal:** Los Angeles, Orange, San Diego, Santa Barbara, Ventura
- **Bay Area:** Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, Sonoma
- **Central Coast:** Monterey, San Benito, San Louis Obispo, Santa Cruz
- **Central Valley/Inland:** Alpine, Amador, Calaveras, Fresno, Inyo, Kern, Kings, Madera, Mariposa, Merced, Mono, Sacramento, San Joaquin, Stanislaus, Tulare, Tuolumne

* The regions fundamentally represent aggregations of the 12 tourism regions defined by Visit California, though the Visit California regions do not strictly follow county boundaries.

STUDY REGIONS



NORTHERN CALIFORNIA REGION VISITOR SPENDING

The Northern California Region is comprised of 21 counties that range from Del Norte County in the northwest to Mendocino County in the southwest and El Dorado County in the southeast. The region includes Eureka, Placerville, and Redding.

In 2022, 2.7 million overnight visitors stayed in Northern California Region short-term vacation rentals (STVRs), spending \$878 million on accommodations.

NORTHERN CALIFORNIA REGION SHORT-TERM VACATION RENTAL VISITOR LEVEL



2.7M

Overnight Visitors



21.3K

Average Active Listings



2.6M

Occupied Unit Nights



\$878M

STVR Rental Revenue

Sources: Longwoods International, KeyData Dashboard, Tourism Economics



OTHER GUEST SPENDING

Spending on food and beverage accounted for 37% of non-lodging STVR guest spending in Northern California.

In the Northern California Region, STVR guests spent \$995 million outside of their accommodations. Combined with the \$878 million spent on accommodations, direct visitor spending totaled \$1.9 billion in 2022.

Spending on food and beverage accounted for 37% of guest non-lodging spending, including restaurants and grocery stores. As a share of total other guest spending, food and beverage spending was the same as the statewide average of 37%.

Retail spending accounted for the second largest share of visitor spending (24%).

Transportation and recreation accounted for the remainder of non-lodging guest spending, totaling \$213 million and \$180 million, respectively.



\$878M

Spending on Accommodations



\$995M

Other Spending

\$1.9 BILLION

Total Direct Spending from STVR Guests in Northern California Region

\$995 MILLION

Northern California Other Guest Spending



FOOD & BEVERAGE
\$368M

37%



RETAIL
\$234M

24%



TRANSPORT
\$213M

21%



RECREATION
\$180M

18%

Source: Longwoods International, Tourism Economics

Note: Transport only includes local transportation within the destination

NORTHERN CALIFORNIA REGION ECONOMIC IMPACT

Northern California Region Economic Impact

Monetary amounts in millions; 2022

Total Vacation Rental Impact				
	Business Sales	Labor Income	Employment	State & Local Fiscal Impact
Direct Guest Spending	\$1,873	\$437	10,149	\$261
Indirect / Induced Impacts	\$1,153	\$296	4,990	\$76
Total	\$3,026	\$733	15,139	\$337

Accommodations Spending & Property Manager and Host Spending				
	Business Sales	Labor Income	Employment	State & Local Fiscal Impact
Accommodations Spending	\$878	\$152	1,203	\$169
Indirect / Induced Impacts	\$580	\$119	1,632	\$23
Total	\$1,458	\$271	2,835	\$192

Other Guest Spending				
	Business Sales	Labor Income	Employment	State & Local Fiscal Impact
Other Guest Spending	\$995	\$285	8,946	\$91
Indirect / Induced Impacts	\$574	\$177	3,359	\$53
Total	\$1,568	\$462	12,304	\$144

In total, spending by Northern California visitors, including STVRs and non-lodging spending (retail, transportation, recreation, and food and beverage), generated \$3.0 billion in economic activity representing sales at businesses throughout the region's 21 counties.

*The \$169 million in state and local fiscal impact includes estimates of local lodging taxes. Lodging tax revenue depends on factors specific to local jurisdictions.



BAY AREA REGION VISITOR SPENDING

The Bay Area Region contains nine counties that range from Sonoma County in the northwest to Santa Clara County in the southeast, and includes Santa Rosa, Napa, San Francisco, Oakland, and San Jose.

In 2022, 3.3 million overnight visitors stayed in Bay Area Region short-term vacation rentals (STVRs), spending \$1.2 billion on accommodations.

BAY AREA REGION SHORT-TERM VACATION RENTAL VISITOR LEVEL



3.3M

Overnight Visitors



41.3K

Average Active Listings



4.9M

Occupied Unit Nights



\$1.2B

STVR Rental Revenue

Sources: Longwoods International, KeyData Dashboard, Tourism Economics



OTHER GUEST SPENDING

Spending on food and beverage accounted for 38% of non-lodging STVR guest spending in the Bay Area.

In the Bay Area Region, STVR guests spent \$2.0 billion outside of their accommodations. Combined with the \$1.2 billion spent on accommodations, direct visitor spending in the Bay Area Region totaled \$3.3 billion in 2022.

Spending on food and beverage accounted for 38% of non-lodging guest spending in the Bay Area Region, including spending at restaurants and grocery stores. As a share of other guest spending, food and beverage spending was greater than the statewide average of 37%.

Retail spending accounted for the second largest share of visitor spending (28%).

Transportation and recreation accounted for the remainder of non-lodging guest spending, totaling \$380 million and \$316 million, respectively.



\$1.2B

Spending on Accommodations



\$2.0B

Other Spending

\$3.3 BILLION

Total Direct Spending from STVR Guests in Bay Area Region

\$2.0 BILLION

Bay Area Other Guest Spending



FOOD & BEVERAGE

\$762M

38%



RETAIL

\$557M

28%



TRANSPORT

\$380M

19%



RECREATION

\$316M

16%

Source: Longwoods International, Tourism Economics

Note: Transport only includes local transportation within the destination

BAY AREA REGION ECONOMIC IMPACT

Bay Area Region Combined Economic Impact

Monetary amounts in millions; 2022

Total Vacation Rental Impact				
	Business Sales	Labor Income	Employment	State & Local Fiscal Impact
Direct Guest Spending	\$3,263	\$913	16,922	\$459
Indirect / Induced Impacts	\$2,289	\$667	7,845	\$160
Total	\$5,553	\$1,579	24,767	\$620

Accommodations Spending & Property Manager and Host Spending				
	Business Sales	Labor Income	Employment	State & Local Fiscal Impact
Accommodations Spending	\$1,247	\$160	1,730	\$262
Indirect / Induced Impacts	\$893	\$128	1,876	\$35
Total	\$2,140	\$288	3,606	\$298

Other Guest Spending				
	Business Sales	Labor Income	Employment	State & Local Fiscal Impact
Other Guest Spending	\$2,016	\$753	15,192	\$197
Indirect / Induced Impacts	\$1,396	\$538	5,970	\$125
Total	\$3,413	\$1,291	21,161	\$322

In total, spending by Bay Area Region visitors, including STVRs and non-lodging spending (retail, transportation, recreation, and food and beverage) generated \$5.6 billion in economic activity representing sales at businesses throughout the region's nine counties.

*The \$262 million in state and local fiscal impact includes estimates of local lodging taxes. Lodging tax revenue depends on factors specific to local jurisdictions.



CENTRAL COAST REGION ECONOMIC IMPACT

Central Coast Region Combined Economic Impact

Monetary amounts in millions; 2022

Total Vacation Rental Impact				
	Business Sales	Labor Income	Employment	State & Local Fiscal Impact
Direct Guest Spending	\$1,034	\$250	4,862	\$163
Indirect / Induced Impacts	\$639	\$168	2,610	\$46
Total	\$1,673	\$418	7,471	\$210

Accommodations Spending & Property Manager and Host Spending				
	Business Sales	Labor Income	Employment	State & Local Fiscal Impact
Accommodations Spending	\$563	\$101	895	\$117
Indirect / Induced Impacts	\$372	\$78	1,082	\$20
Total	\$936	\$179	1,978	\$137

Other Guest Spending				
	Business Sales	Labor Income	Employment	State & Local Fiscal Impact
Other Guest Spending	\$471	\$149	3,966	\$47
Indirect / Induced Impacts	\$266	\$90	1,528	\$26
Total	\$737	\$239	5,494	\$73

In total, spending by Central Coast Region visitors, including STVRs and non-lodging activities (retail, transportation, recreation, and food and beverage), generated \$1.7 billion in economic activity representing sales at businesses throughout the region's four counties.

*The \$117 million in state and local fiscal impact includes estimates of local lodging taxes. Lodging tax revenue depends on factors specific to local jurisdictions.



CENTRAL COAST REGION VISITOR SPENDING

The Central Coast Region is comprised of four counties: Monterey, San Benito, San Luis Obispo, and Santa Cruz. The region includes Santa Cruz, Monterey, Salinas, and San Luis Obispo.

In 2022, 1.8 million overnight visitors stayed in Central Coast Region short-term vacation rentals (STVRs), spending \$563 million on accommodations.

CENTRAL COAST REGION SHORT-TERM VACATION RENTAL VISITOR LEVEL



1.8M

Overnight Visitors



10.5K

Average Active Listings



1.5M

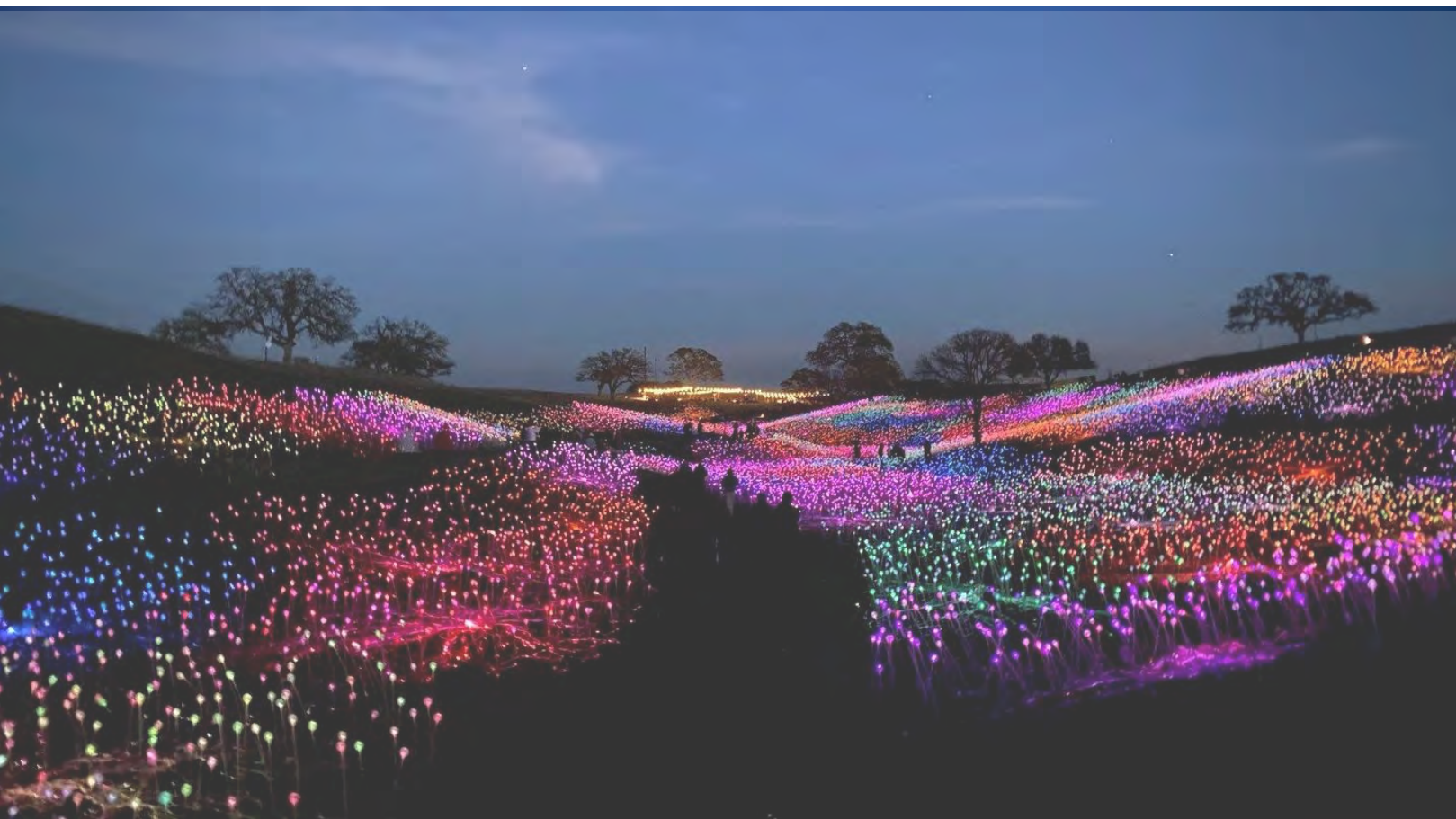
Occupied Unit Nights



\$563M

VR Rental Revenue

Sources: Longwoods International, KeyData Dashboard, Tourism Economics



OTHER GUEST SPENDING

Spending on food and beverage accounted for 41% of non-lodging STVR guest spending in the Central Coast Region.

In the Central Coast Region, STVR guests spent \$471 million outside of their accommodations. Combined with the \$563 million spent on accommodations, direct visitor spending totaled \$1.0 billion in 2022.

Spending on food and beverage accounted for 41% of guest non-lodging spending, including restaurants and grocery stores. As a share of total other guest spending, food and beverage spending was greater than the statewide average of 37%.

Retail spending accounted for the second largest share of visitor spending (25%).

Transportation and recreation accounted for the remainder of non-lodging guest spending, totaling \$81 million and \$77 million, respectively.



\$563M

Spending on Accommodations



\$471M

Other Spending

\$1.0 BILLION

Total Direct Spending from STVR Guests in Central Coast Region

\$471 MILLION

Central Coast Other Guest Spending



FOOD & BEVERAGE
\$194M

41%



RETAIL
\$118M

25%



TRANSPORT
\$81M

17%



RECREATION
\$77M

16%

Source: Longwoods International, Tourism Economics

Note: Transport only includes local transportation within the destination

CENTRAL VALLEY / INLAND REGION VISITOR SPENDING

The Central Valley / Inland Region covers 16 counties that range from Sacramento County in the northeast to Kern County in the southwest and Inyo County in the east. The region includes Sacramento, Stockton, Modesto, Fresno, and Bakersfield.

In 2022, 3.0 million overnight visitors stayed in Central Valley / Inland Region short-term vacation rentals (STVRs), spending \$699 million on accommodations.

CENTRAL VALLEY / INLAND REGION SHORT-TERM VACATION RENTAL VISITOR LEVEL



3.0M

Overnight
Visitors



20.8K

Average Active
Listings



2.8M

Occupied Unit
Nights



\$699M

STVR Rental
Revenue

Sources: Longwoods International, KeyData Dashboard, Tourism Economics

OTHER GUEST SPENDING

Spending on food and beverage accounted for 32% of non-lodging STVR guest spending in the Central Valley / Inland Region.

In the Central Valley / Inland Region, STVR guests spent \$1.1 billion outside of their accommodations. Combined with the \$699 million spent on accommodations, direct visitor totaled \$1.8 billion in 2022.

Spending on food and beverage accounted for 32% of guest non-lodging spending, including restaurants and grocery stores. As a share of total other guest spending, food and beverage spending was less than the statewide average of 37%.

The transportation sector accounted for the second largest share of visitor spending (24%).

Retail and recreation accounted for the remainder of the other guest spending at \$253 million and \$244 million, respectively.



\$699M

Spending on
Accommodations



\$1.1B

Other
Spending

\$1.8 BILLION

Total Direct Spending from STVR Guests in
Central Valley / Inland Region

\$1.1 BILLION

Central Valley / Inland
Other Guest Spending



**FOOD &
BEVERAGE**
\$367M

32%



TRANSPORT
\$274M

24%



RETAIL
\$253M

22%



RECREATION
\$244M

21%

Source: Longwoods
International, Tourism
Economics

Note: Transport only includes
local transportation within the
destination



CENTRAL VALLEY / INLAND REGION ECONOMIC IMPACT

Central Valley / Inland Region Combined Economic Impact

Monetary amounts in millions; 2022

Total Vacation Rental Impact				
	Business Sales	Labor Income	Employment	State & Local Fiscal Impact
Direct Guest Spending	\$1,836	\$445	12,387	\$239
Indirect / Induced Impacts	\$1,264	\$332	5,794	\$90
Total	\$3,100	\$777	18,181	\$329

Accommodations Spending & Property Manager and Host Spending				
	Business Sales	Labor Income	Employment	State & Local Fiscal Impact
Accommodations Spending	\$699	\$103	1,115	\$135
Indirect / Induced Impacts	\$502	\$85	1,344	\$22
Total	\$1,200	\$188	2,459	\$157

Other Guest Spending				
	Business Sales	Labor Income	Employment	State & Local Fiscal Impact
Other Guest Spending	\$1,137	\$343	11,272	\$104
Indirect / Induced Impacts	\$763	\$246	4,450	\$69
Total	\$1,900	\$589	15,722	\$172

In total, spending by Central Valley / Inland Region visitors, including STVRs and non-lodging activities (retail, transportation, recreation, and food and beverage), generated \$3.1 billion in economic activity representing sales at businesses throughout the region's 16 counties.

*The \$135 million in state and local fiscal impact includes estimates of local lodging taxes. Lodging tax revenue depends on factors specific to local jurisdictions.



SOUTHERN CALIFORNIA COASTAL REGION VISITOR SPENDING

The Southern California Coastal Region covers five counties: Los Angeles, Orange, San Diego, Santa Barbara, and Ventura. The region includes Los Angeles, Santa Monica, Anaheim, San Diego, and Santa Barbara.

In 2022, 8.8 million overnight visitors stayed in Southern California Coastal Region short-term vacation rentals (STVRs), spending \$3.6 billion on accommodations.

SOUTHERN CALIFORNIA COASTAL REGION SHORT-TERM VACATION RENTAL VISITOR LEVEL



8.8M

Overnight Visitors



91.4K

Average Active Listings



12.0M

Occupied Unit Nights



\$3.6B

STVR Rental Revenue

Sources: Longwoods International, KeyData Dashboard, Tourism Economics



OTHER GUEST SPENDING

Spending on food and beverage accounted for 36% of non-lodging vacation rental guest spending in the Southern Coastal California.

In the Southern California Coastal Region, STVR guests spent \$4.8 billion outside of their accommodations. Combined with the \$3.6 billion spent on accommodations, direct visitor spending totaled \$8.4 billion in 2022.

Spending on food and beverage accounted for 36% of guest non-lodging spending, including restaurants and grocery stores. As a share of total other guest spending, food and beverage spending was less than the statewide average of 37%.

Retail spending accounted for the second largest share of visitor spending (23%).

Recreation and transportation accounted for the remainder of the non-lodging guest spending at \$981 million and \$967 million, respectively.



\$3.6B

Spending on Accommodations



\$4.8B

Other Spending

\$8.4 BILLION

Total Direct Spending from STVR Guests in Southern California Coastal Region

\$4.8 BILLION

Southern California Coastal Other Guest Spending



FOOD & BEVERAGE

\$1.7B

36%



RETAIL

\$1.1B

23%



RECREATION

\$981M

20%



TRANSPORT

\$967M

20%

Source: Longwoods International, Tourism Economics

Note: Transport only includes local transportation within the destination

SOUTHERN CALIFORNIA COASTAL REGION ECONOMIC IMPACT

Southern California Coastal Region Combined Economic Impact

Monetary amounts in millions; 2022

Total Vacation Rental Impact				State & Local Fiscal Impact
	Business Sales	Labor Income	Employment	
Direct Guest Spending	\$8,377	\$2,176	44,303	\$1,154
Indirect / Induced Impacts	\$7,667	\$2,143	29,277	\$501
Total	\$16,044	\$4,319	73,580	\$1,655

Accommodations Spending & Property Manager and Host Spending				State & Local Fiscal Impact
	Business Sales	Labor Income	Employment	
Accommodations Spending	\$3,581	\$569	4,712	\$698
Indirect / Induced Impacts	\$3,383	\$623	7,618	\$128
Total	\$6,965	\$1,192	12,330	\$826

Other Guest Spending				State & Local Fiscal Impact
	Business Sales	Labor Income	Employment	
Other Guest Spending	\$4,795	\$1,607	39,592	\$456
Indirect / Induced Impacts	\$4,284	\$1,520	21,659	\$373
Total	\$9,079	\$3,127	61,251	\$829

In total, spending by Southern California Coastal Region visitors, including STVRs and non-lodging activities (retail, transportation, recreation, and food and beverage), generated \$16.0 billion in economic activity representing sales at businesses throughout the region's five counties.

*The \$698 million in state and local fiscal impact includes estimates of local lodging taxes. Lodging tax revenue depends on factors specific to local jurisdictions.



SOUTHERN CALIFORNIA INLAND REGION VISITOR SPENDING

The Southern California Inland Region covers three counties: Imperial, Riverside, and San Bernardino and includes San Bernardino, Riverside, Palm Springs, and El Centro.

In 2022, 3.9 million overnight visitors stayed in Southern California Inland Region short-term vacation rentals (STVRs), spending \$1.6 billion on accommodations.

SOUTHERN CALIFORNIA INLAND REGION SHORT-TERM VACATION RENTAL VISITOR LEVEL



3.9M

Overnight
Visitors



39.5K

Average Active
Listings



4.3M

Occupied Unit
Nights



\$1.6B

STVR Rental
Revenue

Sources: Longwoods International, KeyData Dashboard, Tourism Economics



OTHER GUEST SPENDING

Spending on food and beverage accounted for 39% of non-lodging vacation rental guest spending in Southern Inland California.

In the Southern California Inland Region, STVR guests spent \$1.5 billion outside of their accommodations. Combined with the \$1.6 billion spent on accommodations, direct visitor spending in the Southern California Inland Region totaled \$3.1 billion in 2022.

Spending on food and beverage accounted for 39% of guest non-lodging spending, including restaurants and grocery stores. As a share of total other guest spending, food and beverage spending was greater than the statewide average of 37%.

Retail spending accounted for the second largest share of visitor spending (25%).

Recreation and transportation accounted for the remainder of non-lodging guest spending, totaling \$306 million and \$221 million, respectively.



\$1.6B

Spending on
Accommodations



\$1.5B

Other
Spending

\$3.1 BILLION

Total Direct Spending from STVR Guests in
Southern California Inland Region

\$1.5 BILLION

Southern California Inland
Other Guest Spending



**FOOD &
BEVERAGE**

\$568M

39%



RETAIL

\$366M

25%



RECREATION

\$306M

21%



TRANSPORT

\$221M

15%

Source: Longwoods
International, Tourism
Economics

Note: Transport only includes
local transportation within the
destination

SOUTHERN CALIFORNIA INLAND REGION ECONOMIC IMPACT

Southern California Inland Region Combined Economic Impact

Monetary amounts in millions; 2022

Total Vacation Rental Impact				
	Business Sales	Labor Income	Employment	State & Local Fiscal Impact
Direct Guest Spending	\$3,063	\$727	16,262	\$453
Indirect / Induced Impacts	\$1,907	\$493	8,527	\$123
Total	\$4,969	\$1,220	24,789	\$576

Accommodations Spending & Property Manager and Host Spending				
	Business Sales	Labor Income	Employment	State & Local Fiscal Impact
Accommodations Spending	\$1,603	\$303	2,171	\$309
Indirect / Induced Impacts	\$1,066	\$235	3,045	\$44
Total	\$2,668	\$538	5,216	\$354

Other Guest Spending				
	Business Sales	Labor Income	Employment	State & Local Fiscal Impact
Other Guest Spending	\$1,460	\$424	14,090	\$144
Indirect / Induced Impacts	\$841	\$258	5,483	\$78
Total	\$2,301	\$682	19,573	\$222

In total, spending by Southern California Inland Region visitors, including STVRs and non-lodging activities (retail, transportation, recreation, and food and beverage), generated \$5.0 billion in economic activity representing sales at businesses throughout the region's three counties.

*The \$309 million in state and local fiscal impact includes estimates of local lodging taxes. Lodging tax revenue depends on factors specific to local jurisdictions.



APPENDIX

Methodology Overview

Tourism Economics reviewed data from several sources to estimate the total footprint of short-term vacation rentals, including units not listed on Airbnb or VRBO, such as rentals occurring through brokers. These sources included key Data Dashboard, Inc. which covers de-duplicated listings and revenues for short-term vacation rental units listed on the Airbnb and VRBO platforms, and the US Census Bureau, which estimates seasonal and recreational home inventory.

Other guest spending was estimated on top of the foundation of rental activity listed above, by layering in survey data from Longwoods International detailing the average travel party size, and spending shares of California visitors staying in short-term vacation rentals. Further, Tourism Economics prepared estimates of short-term vacation rental operating characteristics that were confirmed for reasonability with industry participants.

Glossary – Spending Definitions

Term	Description
Accommodations	Visitor spending on short-term vacation rentals.
Active Listing	A property active and available for short-term vacation rental use.
Occupied Unit Night	A night stayed by a visitor in a short-term vacation rental. One trip staying at one listing for three nights would be 3 occupied unit nights.
Other Spending	Spending on goods, services, and experiences by visitors outside of accommodations, such as restaurants or attraction entrance fees.
Food and beverage	Includes all visitor spending on food & beverages, including at restaurants, bars, grocery stores and other food providers.
Recreation	Includes visitor spending within the arts, entertainment and recreation sub-sector.
Retail	Includes visitor spending in all retail sub-sectors within the local economy, such as clothing.
Local transport	Includes visitor spending on local transport services such as taxis, limos, trains, rental cars, and buses.

Glossary – Economic Impact Definitions

Term	Description
Direct Impact	Impacts (business sales, jobs, income, and taxes) created directly from spending by visitors to a destination within a discreet group of tourism-related sectors (e.g., short-term vacation rental revenues, recreation, transportation).
Indirect Impact	Impacts created from purchase of goods and services used as inputs (e.g., food wholesalers, utilities, business services) into production by the directly affected tourism-related sectors (i.e., economic effects stemming from business-to-business purchases in the supply chain).
Induced Impact	Impacts created from spending in the local economy by employees whose wages are generated either directly or indirectly by visitor spending.
Employment	Jobs directly and indirectly supported by visitor activity (includes part-time and seasonal work).
Labor income	Income (wages, salaries, proprietor income and benefits) supported by visitor spending.
Value Added (GDP)	The economic enhancement a company gives its products or services before offering them to customers.
Local Taxes	City and county taxes generated by visitor spending. This includes any local sales, income, bed, usage fees, licenses and other revenues streams of local governmental authorities – from transportation to sanitation to general government.
State Taxes	State tax revenues generated by visitor spending. This includes sales, income, corporate, usage fees and other assessments of state governments.

ABOUT TOURISM ECONOMICS

Tourism Economics is an Oxford Economics company with a singular objective: combine an understanding of the travel sector with proven economic tools to answer the most important questions facing our clients. More than 500 companies, associations, and destination work with Tourism Economics every year as a research partner. We bring decades of experience to every engagement to help our clients make better marketing, investment, and policy decisions. Our team of highly-specialized economists deliver:

- Global travel data-sets with the broadest set of country, city, and state coverage available
- Travel forecasts that are directly linked to the economic and demographic outlook for origins and destinations
- Economic impact analysis that highlights the value of visitors, events, developments, and industry segments
- Policy analysis that informs critical funding, taxation, and travel facilitation decisions
- Market assessments that define market allocation and investment decisions

Tourism Economics operates out of regional headquarters in Philadelphia and Oxford, with offices in Belfast, London, Frankfurt, Ontario, and Sydney.

Oxford Economics is one of the world's foremost independent global advisory firms, providing reports, forecasts and analytical tools on 200 countries, 100 industrial sectors and over 3,000 cities. Our best-of-class global economic and industry models and analytical tools give us an unparalleled ability to forecast external market trends and assess their economic, social and business impact.

Headquartered in Oxford, England, with regional centers in London, New York, and Singapore, Oxford Economics has offices across the globe in Belfast, Chicago, Dubai, Miami, Milan, Paris, Philadelphia, San Francisco, and Washington DC, we employ over 400 full-time staff, including 300 professional economists, industry experts and business editors—one of the largest teams of macroeconomists and thought leadership specialists.

For more information:

admin@tourismeconomics.com

ABOUT THE VACATION RENTAL MANAGEMENT ASSOCIATION

Founded in 1985, the Vacation Rental Management Association (VRMA) advances and advocates for the short-term vacation rental property management and hospitality industries.

Headquartered in the United States, membership includes professional property managers, owners, and suppliers in countries throughout the world—in addition to housekeeping and maintenance professionals through its partnership with the Vacation Rental Housekeeping Professionals (VRHP).

VRMA provides news and research, education and networking opportunities, certification and accreditation, promotes the value of the vacation rental experience, and drives industry growth. VRMA engages in advocacy efforts to promote favorable legislative and regulatory environments for the short-term vacation rental industry, and supports fair and reasonable regulation.

VRMA works with lawmakers and government agencies to educate them about the benefits of vacation rentals, emphasizing the contributions made by its members to local economies. VRMA also conducts and underwrites research to generate insights that help its members make informed business decisions and advocate for their community.

To learn more visit:

www.vrma.org and www.vrmaadvocate.org

OVERVIEW

- ▶ **Monterey County** is situated on California's Central Coast with its northern border approximately 100 miles south of San Francisco and about 50 miles from San Jose. Its southern border is approximately 240 miles north of Los Angeles, making it a popular vacation destination.
- ▶ **Estimated Annual Visitors:** 4.6 million (Monterey County Convention & Visitors Bureau, 2019)
 - » **Popular Destinations:**
 - › Carmel-by-the-Sea, Marina, Monterey, Pacific Grove, Salinas, Sand City, Seaside, Moss Landing, Carmel Valley, Big Sur, and Salinas Valley
- ▶ **Monterey County Population:** ~ 428,000 (Esri, 2021)
- ▶ **Median Household Income:** \$77,500 (Esri, 2021)
- ▶ **Ownership Percentage of Occupied Housing Units:** 56% (Esri, 2021)
- ▶ **Variables Analyzed:**
 - » **AirDNA:** Entire Place Listings, Entire Place Bookings, ADR, RevPAR, Occupancy
 - » **Redfin:** Median Home Price, Months of Supply, Home Sales, Inventory, Active Listings, New Listings
 - » **Federal Reserve / BLS:** S&P/Case-Shiller National Home Price Index, Employment

Monterey County, CA

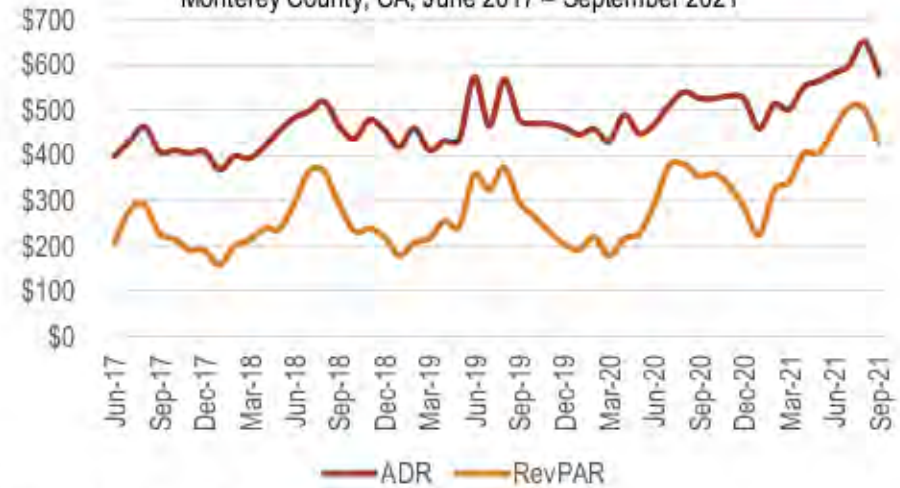


SHORT-TERM RENTAL TRENDS

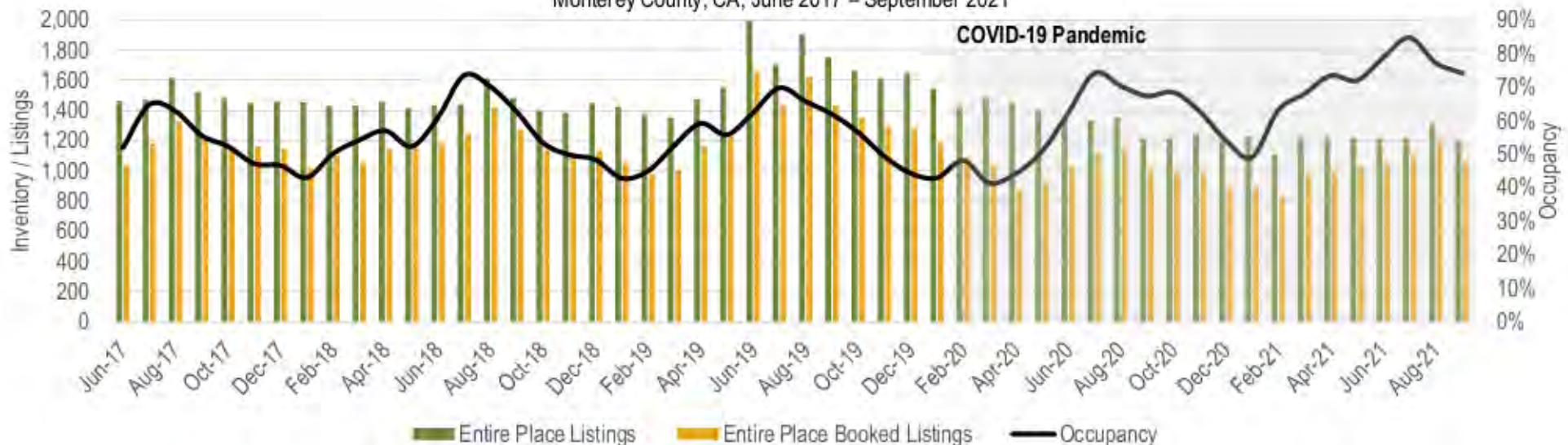
DESPITE STRONG SHORT-TERM RENTAL PERFORMANCE, STR INVENTORY HAS DECLINED SINCE 2019

- ▶ Monterey County averaged approximately 1,500 monthly STR listings between June 2017 and December 2019 but has experienced a noticeable decline over the past two years, with fewer than 1,300 average monthly listings between January 2020 and September 2021, a 15% decline.
- ▶ Strong STR demand during the pandemic and fewer STR listings resulted in historically strong occupancy, average daily rates (ADR), and revenue per available room (RevPAR). STR fundamentals peaked in Summer 2021, with the lowest amount of inventory since the data was tracked dating back to 2017.

Monthly ADR & RevPAR
Monterey County, CA; June 2017 – September 2021



Monthly Listings, Booked Listings, and Occupancy Rate
Monterey County, CA; June 2017 – September 2021



Note: On February 3, 2020, Santa Clara County becomes first CA county to declare a local health emergency due to COVID-19.

Source: AirDNA; RCLCO

STR AND FOR-SALE MARKET TRENDS

ROBUST FOR-SALE HOUSING DEMAND SPURRED BY MIGRATION AND SECOND HOME PURCHASES DURING THE PANDEMIC CONTRIBUTED TO MORE THAN A 27% INCREASE IN HOME PRICES AND A SHARP REDUCTION IN HOUSING INVENTORY

- ▶ In 2Q 2020, Monterey County started to experience a significant increase in for-sale housing demand, as affluent households from the Bay Area and other high-cost cities spurred demand for second homes in Monterey County. This strong demand for housing contributed to sharp declines in for-sale housing inventory, with months of housing supply dropping below two months (five to six months of housing supply is considered equilibrium) and home prices appreciating by more than 27% (see footnote).
- ▶ During this sharp decline in for-sale housing inventory and the rapid appreciation of home prices, short-term rental inventory also experienced a noteworthy decline in listings, as many property owners removed the listings for health and safety concerns, increased personal use, or sold their properties during the hot for-sale housing market. The result of the rapid appreciation of home prices and the decline in STR inventory illustrates an inverse relationship between STR supply and median home price. Many factors contribute to the appreciation of home prices in Monterey County, but STR inventory does not appear to directly affect home prices.

Monthly STR Listings & Median Home Price
Monterey County, CA; June 2017 – September 2021



Monthly STR Listings & Months of For-Sale Housing Supply
Monterey County, CA; June 2017 – September 2021



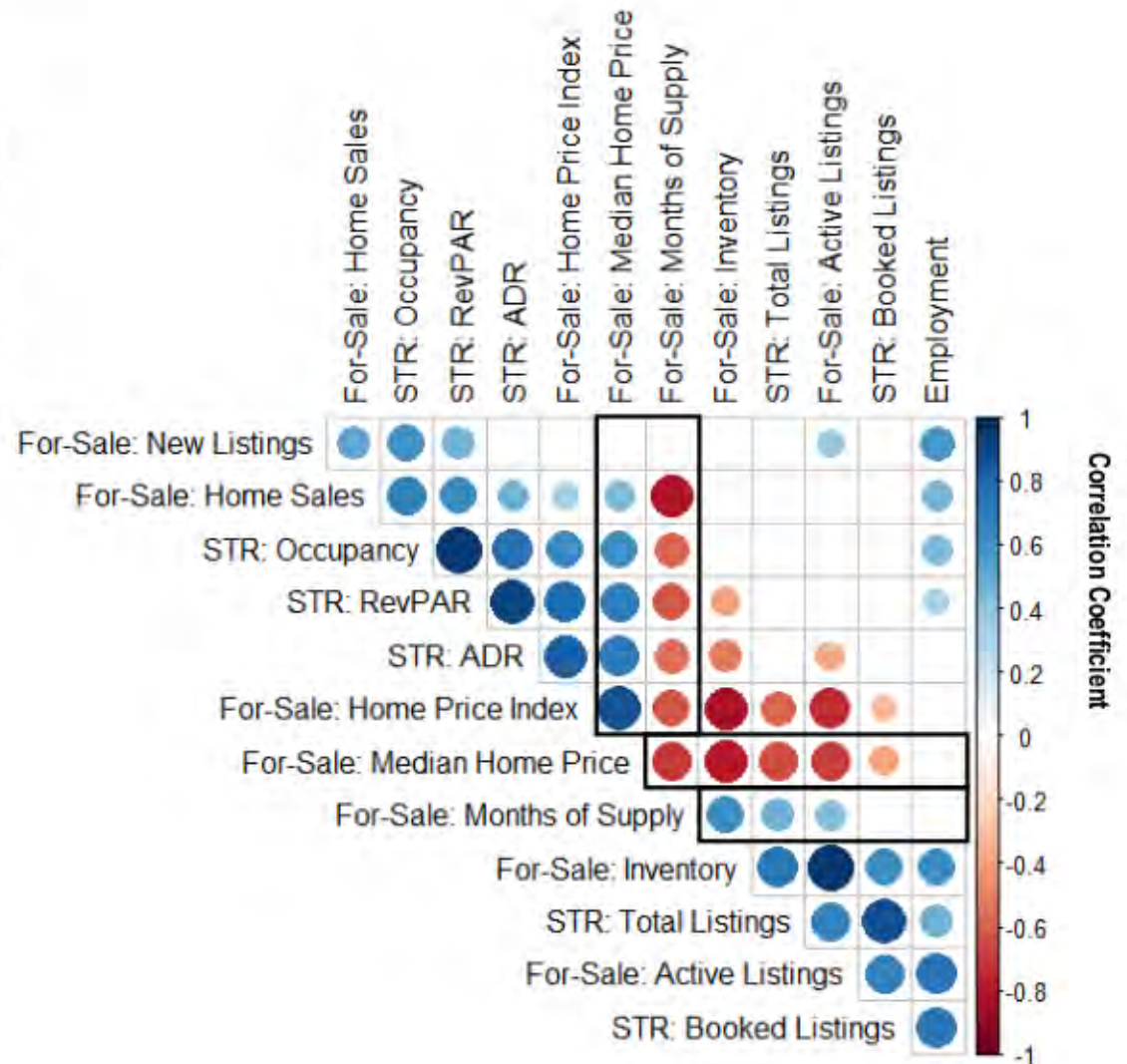
Note: Home price data is sourced from Redfin, which provides home price estimates. According to Monterey County Association of Realtors, housing prices are even more elevated than indicated by the Redfin data, with peak pricing of \$950,000 in March 2021 and current pricing in the mid- to high-\$800s, representing a 40%+ home price appreciation since the start of the pandemic.

Source: AIRDNA; Redfin; RCLCO

CORRELATION ANALYSIS

MONTEREY COUNTY IS A COMPLEX HOUSING MARKET, WITH MANY VARIABLES SIGNIFICANTLY CORRELATED TO HOME PRICES AND INVENTORY

- ▶ The median home price in Monterey County is significantly positively correlated with STR ADR, RevPAR, and occupancy. These variables all reflect the desirability of the market, thus resulting in a positive correlation.
- ▶ In Monterey County, median home price is negatively correlated with both STR entire place listings and entire place bookings, given the recent rapid rise in home prices occurred simultaneously to a decline in STR supply. This reflects the economic trade-off that some property owners make between renting and owning depending on the returns in each market.



Note: Blank spaces signify statistically insignificant correlation between the two variables. A darker color and larger circle represent more significant correlations.

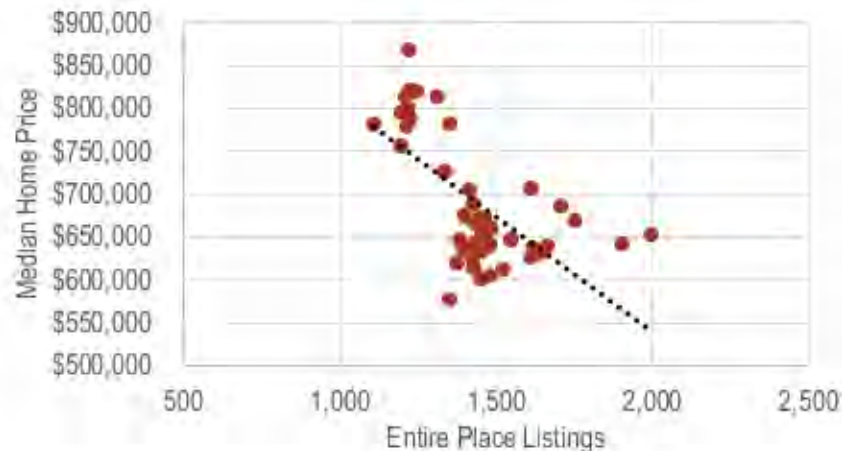
Source: AirDNA; Federal Reserve; Redfin; RCLCO

KEY FINDINGS

A DECREASE IN STR SUPPLY IS CORRELATED WITH AN INCREASE IN MEDIAN HOME PRICE

- ▶ RCLCO's statistical analysis indicates that short-term rentals do not have a statistically significant adverse effect on housing affordability.
 - » A correlation coefficient of -0.64 indicates that there is a fairly strong relationship between STR supply and median home price; however, the analysis indicates that a decrease in STR supply is correlated with an increase in median home price (as the correlation coefficient is negative)
 - » This is strongly supported by the significance of the correlation coefficient since the p-value is much less than 0.354. Therefore, the correlation of STR supply and median home price is statistically significant from zero and in the negative direction.
- ▶ The most highly correlated variable with Monterey County home prices is the Case-Shiller National Home Price Index, illustrating the rise of home values in the local area is aligned with recent trends in the overall national housing market.

Relationship Between Monthly Listings & Median Home Price
Monterey County, CA; June 2017 – September 2021



Significant Correlations

Variables		Correlation Coefficient	P-Value
Total Entire Place Listings	Median Home Price	-0.64	2.5E-07
Total Entire Place Listings	Months of Supply	0.48	0.000275
Entire Place Booked Listings	Median Home Price	-0.39	0.003901
Case-Shiller National Home Price Index	Median Home Price	0.87	0
Median Home Price	Months of Supply	-0.70	5.81E-09

Relationship Between Monthly STR Listings & Months of Supply in For-Sale Market
Monterey County, CA; June 2017 – September 2021



Source: AirDNA; Federal Reserve; Redfin; RCLCO

From: CentralCoast@Coastal
To: [Butler, Katie@Coastal](mailto:Butler,Katie@Coastal)
Subject: Fw: Public Comment – Monterey County LCP Amendment (LCP-3-MCO-24-0024-1)
Date: Wednesday, August 6, 2025 12:08:45 PM

From: Jonathan Balog <jonathan@peninsulaluxe.com>
Sent: Tuesday, August 5, 2025 9:17 PM
To: CentralCoast@Coastal <CentralCoast@coastal.ca.gov>
Subject: Public Comment – Monterey County LCP Amendment (LCP-3-MCO-24-0024-1)

August 7, 2025

California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105-2219
Email: centralcoast@coastal.ca.gov

Subject: Public Comment – Monterey County LCP Amendment (LCP-3-MCO-24-0024-1)

Dear Commissioners,

I am writing on behalf of Peninsula Luxe, a vacation rental management company operating approximately 20 high-end vacation homes in Monterey County, many within the Coastal Zone, including several successful properties at the southern edge of Carmel Highlands. We urge the California Coastal Commission to reject the proposed Monterey County Local Coastal Program (LCP) amendment, particularly its ban on Commercial Vacation Rentals (CVRs) in areas like Carmel Highlands and Big Sur, and to adopt a balanced approach that preserves short-term rentals (STRs) as vital low-cost visitor accommodations.

Our properties, primarily second homes owned free and clear by clients, are not candidates for affordable housing stock. These multimillion-dollar homes would remain private residences, used sparingly by owners, if not rented. By managing these as STRs, we generate significant revenue that owners reinvest into maintaining their properties at a high standard, benefiting the community's aesthetic and economic vitality. For example, our Carmel Highlands properties have been transformed through rental income, ensuring they remain a pristine asset for both owners and guests.

The Coastal Act mandates maximizing public access and encouraging low-cost lodging. Our STRs provide affordable alternatives to luxury hotels like Post Ranch Inn (\$3,000/night), offering families of 4 to 10 people rates far below comparable hotel stays. Moreover, our 3 to 6-bedroom homes offer a more affordable alternative to renting 3 to 4 hotel rooms at \$500 per night, which often lack luxury in local hotels. Guests enjoy the unique experience of bonding with family and friends in the comfort of a home, fostering memorable recreation and connection. Banning CVRs in Big Sur and Carmel Highlands, where affordable lodging is scarce, directly contradicts this mandate, restricting coastal access and overnight accommodations for all those except upper-income families. A poignant example we experienced at one of our properties is a terminally ill mother who, last year, reunited her family for a final vacation in one of our homes, a memory made possible in their unique situation only through STRs.

County data undermines the proposed ban. With only 203 permitted STRs in the Coastal Zone (under 4% of housing stock) and just 13 complaints in Big Sur and Carmel Highlands over four years, there's no evidence of significant impact. The Big Sur Land Use Plan prioritizes visitor-serving uses over residential development, yet this amendment does the opposite, misinterpreting the LUP's intent.

The economic benefits of STRs are substantial. Our 20 properties contribute a six-figure sum annually in Transient Occupancy Tax, helping offset Monterey County's projected \$30+ million budget deficit. Our operations also support local livelihoods - cleaners, landscapers, and maintenance workers - sustaining families and the local economy. Banning CVRs risks leaving these homes vacant, reducing economic activity without increasing housing stock. The amendment's structure is flawed. Requiring a Coastal Development Permit (CDP) for CVRs is unprecedented and burdensome, while vague exemptions for "unique neighborhoods" lack transparency and invite inequity. The prohibition on LLC-owned properties is arbitrary, as title structure does not impact rental operations or community character. We respectfully request the Commission:

- Reject the CVR ban in Big Sur and Carmel Highlands.
- Eliminate the CDP requirement for CVRs.
- Apply the original 6% cap on CVRs across all Coastal Zone areas, including Big Sur and Carmel Highlands.
- Grandfather existing STRs to preserve established operations.

Counties like Santa Cruz and San Luis Obispo have implemented balanced STR regulations with night caps and permit systems, proving a viable alternative to outright bans. Monterey County's amendment sacrifices coastal access and economic benefits without evidence, violating the Coastal Act. We urge a compromise that regulates, rather than eliminates, unhosted STRs to ensure equitable access and economic vitality.

Sincerely,
Jonathan Balog
Co-Owner, Peninsula Luxe

--



From: CentralCoast@Coastal
To: [Butler, Katie@Coastal](mailto:Butler,Katie@Coastal)
Subject: Fw: Support for Certification of Title 20 – LCP-3-MCO-24-0039-1 (Vacation Rental Ordinance)
Date: Monday, August 11, 2025 10:14:03 AM

From: MAL PASO CREEK PROPERTY ASSOCIATION <mpcpa93923@gmail.com>
Sent: Wednesday, August 6, 2025 8:09 PM
To: CentralCoast@Coastal <CentralCoast@coastal.ca.gov>; ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>
Cc: MAL PASO CREEK PROPERTY ASSOCIATION <mpcpa93923@gmail.com>
Subject: Support for Certification of Title 20 – LCP-3-MCO-24-0039-1 (Vacation Rental Ordinance)

Dear Chair and Commissioners,

I am writing on behalf of the Mal Paso Creek Property Association (MPCPA) which is a non-profit neighborhood association representing approximately 120 individual local homeowners in southern Carmel Highlands.

Representing many long-time residents of the Carmel Highlands, the MPCPA Board of Directors wishes to convey our strong support of certifying Monterey County's Title 20 vacation rental ordinance, including its provisions under LCP-3-MCO-24-0039-1. We wish to thank the Coastal Commission staff and the County for their years of thoughtful work on this complex issue and for striking what we see as a fair and necessary compromise that preserves coastal access while protecting our fragile environment and residential communities. We have deep respect for the Land Use Plan (LUP) and Local Coastal Plan (LCP).

For many years, Monterey County lacked a clear ordinance regulating short-term rentals (STRs). This allowed an unchecked proliferation of commercial Airbnbs and vacation rentals in environmentally sensitive and infrastructure-limited neighborhoods like ours. The result has been deeply disruptive and, at times, dangerous.

Here are some of the critical reasons why STRs are incompatible with our community:

A. Septic Failures & Ocean Pollution:

Our neighborhood relies on aging septic systems, and overuse from high-

turnover vacation rentals puts enormous strain on them. When these systems fail, sewage can leach directly into the ocean, threatening both marine ecosystems and human health.

B. Limited Water Resources

We face chronic water scarcity, especially during drought years. Commercial STRs dramatically increase water demand in a zone where conservation is critical.

C. Fire Risk

Carmel Highlands and Big Sur are among the most fire-prone regions in the state. Visitors unfamiliar with local fire protocols add unnecessary risk in a landscape that can't afford mistakes.

D. Dangerous Terrain

Our oceanside cliffs are steep and unpredictable. Tragically, one of our neighbors died last year after falling into the ocean while fishing. This isn't an area suited for unsupervised or unfamiliar visitors.

E. Natural Hazards

We face regular blocked roads from falling trees and storm debris, isolating residents and visitors alike. These situations demand a level of awareness and community connection that short-term renters simply don't have.

F. Extreme Ocean Events

Powerful winter waves have literally broken through homes and started fires. Emergency response is delayed in our area, and the presence of untrained guests complicates evacuations and safety planning.

G. Public Safety Issues

Our neighborhood has experienced noise disturbances, illegal dumping, parking violations, and even a shooting incident tied to a commercial STR in our neighborhood — an event that would likely not have occurred had the

property been a long-term rental.

H. Lack of County Services

Despite being close to town, our neighborhood is underserved by law enforcement, fire protection, and emergency medical services. Other, better-zoned communities are more capable of handling the strain of overnight tourism.

In addition to these safety and environmental concerns, commercial STRs have decimated our local housing supply. In our small community along the southern edge of Yankee Point and Carmel Riviera, we currently have just three long-term renters. Not long ago, there were at least eight—all of whom contributed meaningfully to our local economy and supported the tourism industry by working in hospitality, dining, medical, and retail. Tourism cannot thrive if the workers who sustain it have nowhere to live.

We believe Title 20 represents a reasonable and balanced solution, one that allows for Hosted Home Shares and Limited STRs in the Carmel Highlands while prohibiting commercial STRs in high-risk zones like Big Sur and the Carmel Highlands. There is ample visitor lodging in the County, including North County beaches where the Commission has indicated it will consider allowing more access and potential accommodations. Our neighborhood, however, is simply not equipped—ecologically nor logistically to absorb the impacts of vacation rental commercialization. Seemingly overnight, our neighborhood was turned into a mini hotel zone without the appropriate resources to deal with such a high level of guests.

We thank both the County of Monterey and the California Coastal Commission for your long-standing attention to this issue and urge you to move forward with certification of Title 20 as proposed. This ordinance protects the coast, restores residential character, and still provides for meaningful public access through responsible and regulated short-term rentals.

Sincerely,

Steve Martin, President
Mal Paso Creek Property Association
73 Fern Canyon Road, Carmel CA 93923

CC: MPCPA Board of Directors



Via Electronic Mail Only

Chair Meagan Harmon and Commissioners, California Coastal Commission
Email: ExecutiveStaff@coastal.ca.gov

August 7, 2025

Re: Comments for Keep Big Sur Wild: REF Item 15a, Monterey County Vacation Rental Ordinance

Dear Chair Harmon and Commissioners:

This letter represents the non-profit Keep Big Sur Wild—a group of residents concerned with protecting the scenic landscape, sensitive natural resources, and wild, rural character of the Big Sur coastal region.

We write today to weigh in on the proposed Vacation Rental Ordinances, which currently prohibit all commercial short-term rentals in Big Sur. While we appreciate that the County has acknowledged the physical limitations in Big Sur as they relate to properties being rented commercially for short-term use, we remain concerned with the loopholes and safety concerns presented by “Limited” Vacation Rentals, due to the demonstrated and acknowledged inability of the County to enforce any type of vacation rental. In the current Ordinance, “Limited Vacation Rentals” would be allowed in Big Sur, for up to 3 times per year, also with up to 15 “day” occupants, and 10 people overnight. We request that this provision is removed from the Ordinance, for the compelling reasons described below.

1. **LACK OF ENFORCEMENT:** KBSW has formally reported illegal vacation rentals operating in residentially zoned areas in Big Sur for years, even prior to the estoppel letter issued by the County, and the County has done literally nothing to enforce them. We have also reported numerous illegal event centers with associated vacation rentals operating on residentially zoned properties, such as Wind and Sea, for years, and the County has not acted to shut down these event centers (See Exhibit A). Further, since these commercial vacation rentals have been allowed to operate for years without any enforcement even when they are reported as such, they are proliferating. Thus, we are very concerned about the allowance for **any** type of unhosted vacation rental (e.g., “Limited”—up to three times per year), and we request that this provision is removed from

the Ordinance. It is clear that no enforcement regarding the number of times it is rented or other limitations would commence, even if the proposed limitations are approved in the proposed Ordinance and violations of the limitations are reported to the County. The staff report prepared by the Commission *acknowledges* that the County will not respond to complaints unless a level 1 (Health and Safety) issue is present. Accordingly, it is fair to assume that no enforcement would occur. As the staff report states in a footnote:

“County enforcement staff have conducted various enforcement efforts against unpermitted short-term rentals over the years, but have indicated that County resources are limited for enforcing this type of violation unless it poses an immediate threat to life and safety. Given available resources, the County classifies and pursues code violations by priority on a scale of one to three, with one being the highest and three as the lowest. STRs are typically classified as priority three, and handled as time allows relative to higher priority cases.”

2. **VACATION RENTALS IN REMOTE AREAS PRESENT REAL SAFETY THREATS AND MAINTENANCE ISSUES ON RURAL ROADS:** Big Sur vacation rentals are often in remote areas on hilltops with one-lane, dead end roads and places with gate codes and limited access that are privately maintained. In the event of an emergency, vacation renters (up to 15 “day” visitors and 10 per night) would be unfamiliar with proper evacuation routes and could potentially endanger year-round residents and themselves. As the CCC staff report notes:

“Chapter 16.80 requires project applicants for development that is served by a private road to provide notice to all users/owners of that road, and to abide by the rules of any private road maintenance agreement, or for the County to resolve disputes amongst the parties via conditions of approval (emphasis added). The Commission’s understanding is that the proposed amendment would require compliance with this private road ordinance for just Commercial Vacation Rental CDP actions.”

The problem is that since Limited vacation rentals only require a business license, these types of concerns and needs would not be addressed.

The following is just one example of many vacation rentals that are located in very remote areas. It is located up on Weston Ridge, and is, by any measure, extremely expensive (over \$43,000 dollars for one week). Here is a picture of the road that leads to it (shared and maintained by residents who live on the ridge) and an image of the current listing for this vacation rental. The listing states it is in Carmel by the Sea, but it is in Big Sur. The safety issues that allowing rentals such as these in Big Sur are real and of great concern to year-round residents, as demonstrated by the picture of the road that leads up to the ridge:



7:47 PM Mon Aug 4

sanctuaryvacationrentals.com

100% battery icon



Check in/out 2 Guests 0-9 bedrooms Rental Types More Filters



Photos Details Video Location

- Fireplace - Gas
- Fully Equipped Kitchen
- Gourmet Kitchen
- Levels - Multiple Level Home
- Location - Secluded
- Parking - Off Street
- Sorry, No Pets
- Apple TV (No Cable)
- View: Bay/Ocean
- Washer and Dryer
- Wet Bar
- Pack-n-Play (No Linens)
- Free Internet / Wifi
- Garage - One Car
- Guest Suite - Included
- Location - Quiet Residential
- No Smoking Property
- Quality Bed and Bath
- Linens
- TV with Streaming Service
- More Than One TV
- View: Mountain/Valley
- Location - Big Sur
- Wine Refrigerator
- See also Standard Amenities page

14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30				

When selected Dates

Quote for: 3920 Red Tail Hawk

Arriving	9/15/2025
Departing	9/22/2025
Nights	7
Base Rate	\$37,625.00
Property Protection Plan	\$100.00
Processing Fee	\$350.00
Housekeeping Fee	\$800.00
Tax	\$4,081.88
Total	\$42,956.88

https://www.airbnb.com/rooms/1211649893954286593?adults=1&location=Carmel%20Highlands%2C%20CA&search_mode=regular_search&check_in=2025-08-08&check_out=2025-08-13&children=0&infants=0&pets=0&source_impression_id=p3_1754334866_P3PBQlsuleWMTg5d&previous_page_section_name=1001

The CCC staff report goes on to acknowledge:

“Big Sur is mountainous, remote, and full of sensitive habitats. In cases where development potential is limited, the Commission has in past cases recognized that more stringent limits on vacation rentals may be appropriate to retain existing housing stock given the difficulties in increasing supply (*emphasis added*). And this loss of some vacation rentals is tempered by the fact that the overall package, including the allowance for unlimited Homestays and Limited Vacation Rentals in all areas, would still allow for these types of rentals to serve as important visitor serving facilities for groups of visitors or families”...

The existing Big Sur Coast Land Use Plan (Section 5.4.2.G.2) currently states that in Rural Residential areas “development in designated rural residential areas shall continue to be limited to residential uses in order to protect residents from unwanted intrusion by other incompatible activities.” This also must apply to any consideration of Limited Vacation Rentals.

Aside from the number of persons allowed to sleep overnight, the allowance for an additional five persons (up to 15) each day is inviting a “party” type scenario that is problematic and can create unsafe conditions for neighbors and visitors in extremely rural residential neighborhoods. The number of persons must be correlated to the actual house size and capacity, and the appropriateness of the use in the neighborhood must be considered before approving any type of vacation rental (including whether visitors would be traveling on unsafe roads and steep slopes, as is the case for many areas in Big Sur as demonstrated above).

It is not appropriate to apply the same numerical allowances used for Commercially rented properties to Homestays and Limited Vacation Rentals. In particular, with Homestays, the principal resident is required to occupy one bedroom, and allowing 10 persons per night would require that each home would have to have 6 bedrooms available, since Building Codes only allow two persons per bedroom. Thus, there must be a process by which the number of allowed persons is directly correlated to the size of the home seeking a permit, and plans for each home should be required to be presented to the County as part of their application for a permit. **However, it is our understanding that this Ordinance would not require Coastal Development Permits for Limited rentals, which opens the floodgates for abuses.**

- 3. DEDICATED ENFORCEMENT PERSONNEL ARE REQUIRED TO ENSURE ORDINANCE RESTRICTIONS ARE IMPLEMENTED:** Other jurisdictions, such as the City of Santa Barbara, have hired enforcement personnel SPECIFIC to monitoring and fining illegal vacation rentals with great success, both from a financial perspective and in keeping them in check. The Commission should ensure that a functional mechanism is in place to enforce the limitations they approve. Even if appropriate limitations on the number of persons allowed to inhabit Homestays and Limited Vacation Rentals are

enacted, the fundamental issue at hand is enforcement, which has historically been non-existent in Big Sur, even before the “Estoppel” letter was issued. Thus, we have a suggestion that has been proven successful in Santa Barbara: Fund a short term rental “Task Force and Enforcement Team”. Please read the attached article for details on the success of this program, which was recently approved by the Santa Barbara City Council for another year and has yielded tangible results.

<https://www.independent.com/2024/04/17/behind-santa-barbaras-short-term-rental-crack-down/>

The task force has been incredibly successful in eliminating the majority of illegal vacation rentals in Santa Barbara, and has proven itself to not only be successful with enforcement, but also to generate revenue from offenders that support the ongoing program. This concept is something that should also be implemented in Monterey County. Without proper code enforcement, the best written ordinance is a moot point that will be ignored by illegal operators who know that the chances of them getting caught are slim to none. With the amount of revenue generated by vacation rentals in Big Sur (!), the incentive to keep operating until they must stop is high, and the fines proposed in the draft ordinance will not have a chilling effect on illegal operators, however, a serious enforcement task force would achieve this goal.

Monterey County should take the enforcement of illegal STRs as seriously as other jurisdictions like the City of Santa Barbara. With their proven success, it seems a natural step to replicate their program. While hiring additional County staff to process incoming applications is helpful, it was left very vague about hiring “third party” enforcement and was unclear if the status quo with code enforcement (e.g., only responding to health and safety issues) would occur. Currently the third party is assumed to “assist HCD with the initial educational outreach and courtesy notification of Operators operating unpermitted Vacation Rentals”. This is simply too weak to be effective.

KBSW also questions why, if “Limited” vacation rentals of three per year are allowed, there would be a need for an “operator” (not the actual owner), to run the rental. Hiring an operator inherently implies a more intensive use and need for management. The CCC’s staff report reads:

Where an “operator” is defined as “a person who operates the Vacation Rental and, if not the Owner, a person, has the legal permission of the Owner to operate the Vacation Rental on the subject real property.”

Since Monterey County has admitted (as referenced in the CCC’s staff report and noted above) that no enforcement would occur unless it involves an immediate threat to health and safety, there will be no monitoring of this limit and it is highly unlikely that an owner would ever be present. This is how the LLCs operate; they invest in a property, hire a manager, and rent it out.

4. THE BIG SUR LAND USE PLAN IS CURRENTLY UNDERGOING A REVISION AND THIS ISSUE IS DIRECTLY RELEVANT AND A KEY ELEMENT OF THE PLAN UPDATE:

The BSLUP is currently under review for a revision and update, and *one of the core tenets of the current BSLUP is a limit on the number of visitor serving units in the area*. The County should not be allowed to collect TOT on “Limited” rentals without counting them towards the existing Visitor-Serving Unit cap, which has already been exceeded. KBSW prepared a detailed inventory with historic data to support the exceedance of allowed VSU numbers. Further, all vacation rentals in Big Sur should be prohibited until such time the VSU numbers are firmly established and approved in the BSLUP update. Please refer to our attorney’s letter regarding the Visitor Serving Count as it relates to the BSLUP update, which provides historical documentation on the numbers of approved (and approvable) VSUs in the Big Sur area (Exhibit B). It is odd that the County proposes to collect TOT from vacation rentals (including Limited ones), yet they will not count towards the Visitor Serving Unit cap which is clearly outlined in the approved BSLUP. Finally, we strongly disagree with the County’s assertion that:

“Limited vacation rentals do not need to comply with the visitor serving unit caps found in the Big Sur Land Use Plan. Limited vacation rentals are defined in a manner to be similar in character, density, and intensity to residential uses and are not anticipated to remove long-term housing from the market and therefore are allowed uses.”

Allowing for rentals does remove long-term housing from the market, and long-term housing is an important consideration in Big Sur, given the limitations on development. Allowing Short-term Vacation Rentals of any type is a visitor serving use, and should be counted as a VSU.

Ordinance details that Keep Big Sur Wild supports

The draft Ordinance helps to address the proliferation of illegal vacation rentals created by the influx of investors in the Big Sur region by limiting the number of Commercial Vacation Rentals that a single owner can have at any time. Although these are already proposed to be prohibited in Big Sur, this is a step in the right direction from a policy standpoint. Additionally, we support fines for hosting platforms that do not comply with the draft ordinances, as well as increasing the maximum fines for violations. **Limited Liability Corporations should not be allowed to own and operate any kind of vacation rental, instead, they should be limited to natural persons or a family trust.** Big Sur is critically threatened by the proliferation of LLC investments for profit on multiple fronts, which will forever change the character of the community.

The Phasing Out Process can and should be expedited for Big Sur

We support the phasing out of all illegal operations of commercial vacation rentals in Big Sur and believe there is no other community in the Monterey County planning area more

deserving of special consideration given its physical constraints. As the County's staff report stated during the deliberations on the issue before its Board of Supervisors: "Before the effective date in the Coastal Zone, the **County can require earlier termination of unpermitted operations when there is a risk to public health, safety, and welfare.**" We believe we have demonstrated that vacation rentals in Big Sur do present an inherent public safety threat, for visitors and residents alike. Notably, the proposed draft of the Big Sur Land Use plan continues to disallow commercial operations outside of Bed and Breakfasts (which require a discretionary permit). It is also imperative that commercial vacation rentals and venues (some operating with wedding event centers, such as Wind and Sea), be forced to stop operating as soon as possible.

In sum, we request that the Commission remove the opportunity for "Limited" vacation rentals from the Ordinance, and require appropriate enforcement mechanisms. We thank you for the opportunity to comment and look forward to your careful deliberation on this important issue.

Best Regards,



Christina McGinnis, via electronic submission

Christina McGinnis
On behalf of Keep Big Sur Wild

Exhibit A

KBSW's letter reporting illegal event centers with vacation rentals on residential properties in Big Sur

SHUTE MIHALY
 WEINBERGER LLP

396 HAYES STREET, SAN FRANCISCO, CA 94102
T: (415) 552-7272 F: (415) 552-5816
www.smwlaw.com

SARA A. CLARK
Attorney
Clark@smwlaw.com

February 7, 2023

Via Email Only

Erik V. Lundquist
HCD Director
Monterey County Housing and
Community Development
1441 Schilling Place, South 2nd Floor
Salinas, CA 93901
lundquiste@co.monterey.ca.us

Re: Special Events in Big Sur

Dear Mr. Lundquist:

I write on behalf of my client, Keep Big Sur Wild, about the proliferation of special events on residential properties in the area covered by the Big Sur Land Use Plan. These uses are resulting in significant environmental and community impacts, such as noise, traffic, and increased risk of community hazards including wildfire and accidents. They are also flatly inconsistent with the Big Sur Land Use Plan. And they appear to be operating in violation of the Coastal Act, which broadly prohibits development—including intensive uses such as these—without a Coastal Development Permit.

The County is already aware of one such venue known as “Wind and Sea,” which operates weddings, parties, and retreats on a residential property (see <https://www.windandseabigsur.com/>). We understand that County Staff had cited the property owner for numerous violations related to special event offerings in Fall 2022, but the venue still appears to be operating without change.

We are aware of at least seven other similar venues offering commercial special events on residential properties. These event venues are documented in the attached pages, with additional photographs provided via link here: https://shutemw-my.sharepoint.com/:f:/g/personal/larkin_smwlaw_com/EnLuC_-68gBJiLipJh1GNN0BaQ3QyNW9T4sy2UuNqIY4Jg?e=cQ0MV5.

The Big Sur Land Use Plan clearly prohibits commercial special events in Rural Residential Areas. Specifically, the LUP states that residential areas “are not well suited for commercial agriculture, commercial, or visitor uses; use of these areas, to the extent consistent with resource protection, should continue to be for residential purposes.” LUP section 5.1.1, pg. 72. It establishes that within the Rural Residential category, rural residences are a principal use, and “secondary uses appurtenant to rural residences include garages, work or storage sheds, and art or craft studios.” LUP section 5.3.1(6), pg. 79. No commercial special event uses are mentioned as secondary uses. Development Policy 5.4.3(G)(2) likewise specifies that “development in designated rural residential areas shall continue to be limited to residential uses in order to protect residents from unwanted intrusion by other incompatible activities and because neither available vacant land, water, nor roads are adequate to support more intensive uses.” LUP, pg. 94.

The Coastal Zoning Code also prohibits commercial special events in all Residential and Watershed and Scenic Resources zoning districts. Commercial special events such as weddings, parties, and retreats are not listed in the permitted uses; if uses are not listed, they are prohibited. Monterey County Zoning Code §§ 20.02.040, 20.08.040(A)(1).

Finally, under the Coastal Act and the County’s Local Coastal Program, any activity that qualifies as “development” requires a Coastal Development Permit or a Coastal Administrative Permit from the County. Coastal Zoning Code § 20.70.025. “Development” is broadly defined under the Act and the County’s Zoning Code to include a “change in the density or intensity of use of land.” *See* Pub. Res. Code § 30106; Zoning Code § 20.06.310(4). Adding special event uses to a residential property is a change in the intensity of use of land and thus qualifies as “development” that requires a Coastal Development Permit. *See*, for example the Coastal Commission’s pamphlet stating that a Coastal Development Permit is required when “changing the intensity of use of land, such as using a single family home as a commercial wedding venue.” Available at https://www.coastal.ca.gov/enforcement/cdp_pamphlet.pdf. Given that neither the Big Sur Land Use Plan nor the Coastal Zoning Code permit commercial special event uses, Coastal Development Permits cannot be issued for these uses on the referenced properties. There is no viable permit path available to correct these violations and allow the uses to continue.

These special event venues are having severe, negative impacts on the Big Sur community, the availability of Big Sur’s limited facilities to the visiting public, the availability of housing, and the area’s natural resources. Given their fundamental incompatibility with the Big Sur Land Use Plan, and the County’s duty to implement the

Erik V. Lundquist
February 7, 2023
Page 3

LUP pursuant to the Coastal Act, the County must act quickly and effectively to curtail these uses. We ask for a written response or meeting to discuss within the next 30 days.

Sincerely,

SHUTE, MIHALY & WEINBERGER LLP



Sara A. Clark

cc: Supervisor Mary Adams (district5@co.monterey.ca.us)
Dan Carl (dan.carl@coastal.ca.gov)

1613956.1

Erik V. Lundquist
February 7, 2023
Page 4

The Moon Ranch, APN 418-011-074

Owner: John Leonard Moon III
Old Coast Rd
Carmel, CA 93920 (Big Sur LUP)

Instagram post and video below of Outstanding in the Field at the Moon property May 24 & 25 of 2022

www.instagram.com/p/CdwXpUoPNjR/

Attach 1. Another view of the Glamping setup

Attach 2. View of Dining setup

Attach 3. A little bit about what you'll get to experience

Attach 4. Announcement of Secret Location (John & Suzy Moon), so much for secrets!

Attach 5. OITF facebook post (Nov. 5, 2018) stating "took and adventure up to the Moon Ranch."

Attach 6. OITF ad Glamping & Dinner for May 24th & 25th and November 5th & 6th of 2022

Attach 7. Shot of the November 6th 2022 prices and what it will cost a "party of two" for dinner and i night of overnight accommodations (\$2800)

Below is a November 9, 2018 video for the Moon Ranch

www.bing.com/videos/search?q=outstanding+in+the+field&&view=detail&mid=5B5DC24436867A60AFA65B5DC24436867A60AFA6&&FORM=VRDGAR&ru=%2Fvideos%2Fsearch%3Fq%3Doutstanding%2Bin%2Bthe%2Bfield%26FORM%3DVDRESM

We believe the video below is from one of the 2018 Moon Events

vimeo.com/268595077

Erik V. Lundquist
February 7, 2023
Page 5

Jewel In the Forest

Sofanya White
37732 Palo Colorado Rd.
Carmel, CA 93923 (Big Sur LUP)

APN 418-081-016

www.jewelintheforest.com

'Jewel in the Forest'! We are conveniently located halfway between Carmel & Big Sur and just thirty minutes from Monterey, California. You will surely enjoy a spectacular drive along the [-- go to very bottom of page to read about weddings and other events.](#)

<https://essencesoflife.org/womens-big-sur-aromatherapy-retreat/>

WOMEN'S BIG SUR AROMATHERAPY RETREAT

May 3, 4, 5th, 2019 In the beautiful Big Sur Redwood forests – Essences of Life Aromatherapy will be hosting a women's Aromatherapy Retreat for health and wellness. Get your mojo going with Mother Nature – get in sync for your busy life this year – Renew, reconnect, awaken the "Tigress" in our soul & body. Come join in a small group of only 10 attendees in the magical and healing forests of Palo Colorado Canyon deep in the Big Sur Redwood Forest on a private estate. You will be awakening your spiritual connection with nature, focusing your mind, body and heart towards pure health in aligning with the forest while immersed in Aromatherapy workshops, communal luncheon from organic local sourced foods, commune in group yoga, American Indian drum circle and meditations. Your package will include two nights in a private guest cabin (details below for 1, 2 or 3 person accommodations) at our private forest retreat with event presentations over two days of yoga, meditation, spirit awakening and affirmations to Mother Earth, wildcrafting walks, Aromatherapy workshops – building body scrubs from the terroire, and an essential oil pharmacy to take home for your health. Additionally, you will each experience the wellness of a "Forest Massage" and body treatment by Moni. Moni is a local healer in Big Sur and is more than just her healing hands.

Our Host at our "Retreat in the Forest" is Sofanya, the artist in residence who will host your creative endeavors in painting in the forest. She also offers "Essence Portraits" that capture your special energies in her beautiful watercolored artwork for you to take home (this is a separate cost which can be arranged in advance with Sofanya). Or you can create your own forest painting as we provide all the materials and canvas for your creation. Sofanya offers a "Spirit of Creativity" workshop that can be arranged and purchased individually during your stay. Please contact Sofanya directly at art@sofanya.com or call her at 831-238-0543. www.sofanya.com

Erik V. Lundquist
February 7, 2023
Page 6

Paion Wedding Events & Helicopter Elopements

Peter Harding (Paion Wedding Events & Helicopter Elopements), no website ... booked through Diane Allen's Big Sur Wedding website
54310 & 54540 Hwy 1
Big Sur CA 93920

APN 421-011-013 & 421-011-012 (Peter & Margaret Harding)

www.beningramvisuals.com/blog-post/big-sur-helicopter-elopement

www.beningramvisuals.com/brochure

www.chrismanstudios.com/blog/weddings/alex-greg-big-sur-wedding-at-paion-estate/

This private estate doesn't allow us to identify it here, but it can be booked through wedding coordinator Diane Allen at Big Sur Weddings.

bigsurweddings.com

www.youtube.com/watch?v=Fi8otDVk-E

www.chrismanstudios.com/blog/weddings/jena-yves-paion-estate-wedding/

www.theknot.com/real-weddings/an-elegant-rustic-wedding-at-the-paion-estate-in-big-sur-california-album?page=1

www.pacificweddings.com/weddings/rustic-big-sur-wedding-with-succulent-decor/

heliosimagesjournal.com/paion-elopement-in-big-sur/

archiverentals.com/city/california/big-sur/

Erik V. Lundquist
February 7, 2023
Page 7

Endless Ocean Estate

Gary F & Belinda Day
41095 Hwy 1
Carmel, CA 93923 (Big Sur LUP)

APN 418-021-036

<http://seastarscatering.com/endless-ocean-estate-drama-cliffs-intimate-wedding-spot-big-sur/>

March 24, 2020

www.gretchengause.com/wedding-journal/endless-ocean-big-sur-wedding

Jan. 11, 2022

brandonscottphoto.co/weddings/endless-ocean-big-sur-wedding/

Erik V. Lundquist
February 7, 2023
Page 8

Wind and Sea

Wind & Sea Properties LLC
54722 Hwy 1
Big Sur, CA 93920

APN: 421-011-010

<https://www.windandseabigsur.com/>

naturvillas.com/properties/wind-and-sea-big-sur-2/

www.simoneanne.com/wind-and-sea-big-sur-wedding/

www.bing.com/videos/search?q=wind+and+sea+big+sur&&view=detail&mid=5C0B402CF20C4D35A4B85C0B402CF20C4D35A4B8&&FORM=VRDGAR&ru=%2Fvideos%2Fsearch%3Fq%3Dwind%2Band%2Bsea%2Bbig%2Bsur%26qpvt%3Dwind%2Band%2Bsea%2Bbig%2Bsur%26FORM%3DVDRE

www.bing.com/videos/search?q=wind+and+sea+big+sur&qpvt=wind+and+sea+big+sur&view=detail&mid=AF54DE50ADD315A70F6BAF54DE50ADD315A70F6B&&FORM=VRDGAR&ru=%2Fvideos%2Fsearch%3Fq%3Dwind%2Band%2Bsea%2Bbig%2Bsur%26qpvt%3Dwind%2Band%2Bsea%2Bbig%2Bsur%26FORM%3DVDRE

www.bing.com/videos/search?q=wind+and+sea+big+sur&qpvt=wind+and+sea+big+sur&view=detail&mid=26E5EC0BA454A90C088126E5EC0BA454A90C0881&&FORM=VRDGAR&ru=%2Fvideos%2Fsearch%3Fq%3Dwind%2Band%2Bsea%2Bbig%2Bsur%26qpvt%3Dwind%2Band%2Bsea%2Bbig%2Bsur%26FORM%3DVDRE

<https://www.vrbo.com/311490>

<https://www.airbnb.com/rooms/22086669>

Erik V. Lundquist
February 7, 2023
Page 9

Big Sur Wedding and STR site-Big Sur Retreats

Justin G. Donnelly
Address Unknown
Big Sur, CA 93920

APN 422-011-024

www.bigsurificretreats.com

www.bigsurificretreats.com/experiences/events

www.eventective.com/big-sur-ca/bigsurific-retreats-726541.html

Erik V. Lundquist
February 7, 2023
Page 10

Big Sur Stonehouse

Mark Philip Talbrook
67585 CA-1
Big Sur, CA 93920

APN 423-011-037

www.bigsurstonehouse.com/amenities

www.bigsurstonehouse.com/contact

www.vrbo.com/912865ha

thecoordinatedbride.com/latest-weddings/a-romantic-pacific-coast-wedding-miya-and-adam/

staceyklein.co/big-sur-california-wedding-hannah-and-jon/

weddings

vimeo.com/168707975

vimeo.com/178958972

www.helenaandlaurent.com/wedding-photography/intimate-big-sur-wedding-on-private-property/

Erik V. Lundquist
February 7, 2023
Page 11

Big Sur Forest Retreat

Richard & Jill Strollmeyer
69331 Hwy 1
Big Sur CA 93920

APN 423-011-016

www.bigsurforestretrat.com

Exhibit B
KBSW's letter regarding Visitor-Serving Unit Counts in the BSLUP

SHUTE MIHALY
& WEINBERGER LLP

396 HAYES STREET, SAN FRANCISCO, CA 94102
T: (415) 552-7272 F: (415) 552-5816
www.smwlaw.com

SARA A. CLARK
Attorney
Clark@smwlaw.com

September 26, 2023

Via Electronic Mail Only

Kate Daniels
Martha Diehl
Monterey County Planning Commission
168 West Alisal Street, 1st Floor
Salinas, CA 93901
daniels.kate@gmail.com
mvdiehl@mindspring.com

Re: Cap on Visitor-Serving Units on Big Sur Coast

Dear Ms. Daniels and Ms. Diehl:

I write to bring to your attention information relevant to the existing cap on visitor-serving units on the Big Sur Coast. On behalf of Keep Big Sur Wild, we believe this information is relevant as you consider updates to the Big Sur Land Use Plan, which we understand is currently being reviewed by a working group of the Monterey County Planning Commission.

As you know, the Big Sur Land Use Plan permits “up to 300 new visitor-serving lodge or inn units on the Big Sur Coast, based on protection of the capacity of Highway One to accommodate recreational use, the avoidance of overuse of areas of the coast, and the need for development to respect the rural character of the Big Sur Coast and its many natural resources.” (LUP Policy 5.4.2.9).

For a number of years, the County has created confusion about this visitor-serving unit (“VSU”) cap and its current applicability. For instance, in a Fall 2020 presentation at the Planning Commission concerning the County’s development of a vacation rental ordinance, County staff stated that there are 260 remaining visitor serving unit allocations available under the Big Sur LUP. Staff further explained that this number was calculated by subtracting 40 inn units that were approved after adoption of the plan on April 10, 1986 from the total cap of 300 new units. Staff acknowledged, however, that their records on this issue were likely incomplete. Then, the Staff Report for the

Kate Daniels
Martha Diehl
September 26, 2023
Page 2

November 17, 2020 Board meeting on the issue concluded, without documentation, that “there are approximately 235 visitor serving units remaining in the plan area.”

Based on a review of newly discovered information, it appears that the County’s conclusion on this issue—that at least 235 VSU entitlements are still available—is incorrect for four main reasons. We’ve prepared a table—Attachment 1—which demonstrates the key issues.

As a preliminary matter, the table compiles information from a variety of sources. The “1980 Room Count” is based on information from the Big Sur Gazette, attached hereto, as well as the LUP itself. The “2023 Room Count,” compiled by KBSW, is based on publicly available information from websites and the front desk staff at specific locations. The data in the columns under “County Calculations” come from a spreadsheet labeled “BSC LUP VSU Count,” which was provided by the County in response to a March 30, 2021 public records act request, and is attached again here. We would be happy to review the specifics of the table in greater detail if desired.

Incorrect Baseline

First, the County has stated that only 40 inn units were added since the adoption of the plan on April 10, 1986. However, 1986 is the wrong starting line, as evidenced by the LUP itself. Instead, the count must begin at the time the LUP—and its cap of 300 new visitor-serving units—were developed.

Specifically, the LUP statement that “**At present**, there are eight motels, lodges, or inns on the coast providing a total of 168 rooms.” (LUP § 5.1.4 (emphasis added)). This description, which should act as the baseline against which VSU growth is planned, has long confounded the County and the public, as there appeared to be more than 168 rooms in 1986. But this is because the baseline number was likely developed in 1980.

The LUP was approved by the Planning Commission on Feb. 11th, 1981 (See Reference 1, Big Sur Gazette article documenting planning commission action). Around that time, the Big Sur Gazette also ran an advertisement for all lodgings on the coast, showing 8 motels, lodges and inns with a total room count that corresponds very closely to the LUP’s count (170 vs 168) (See References 2 and 3). In other words, the LUP was developed and premised on a clear and accurate understanding that there were 168 units in Big Sur, and the Highway, coast, and natural resources could only handle the addition of 300 more.

Kate Daniels
Martha Diehl
September 26, 2023
Page 3

The problem stems from the fact that 1980 to 1986 were very active building years for the Big Sur region. As documented in Attachment 1, by the time the Coastal Commission acted to certify the LUP in 1986, the region had added an additional 110 units, with about half of them built at Ventana. *See* Attachment 1 (comparison between “1980 Room Count” and “1986 Room Count” show units added at Big Sur Lodge, Big Sur River Inn, Deetjen’s, Fernwood, Glen Oaks, Ventana, Riverside, Big Sur Campgrounds, Burleigh, and Gorda).

Starting the VSU count in 1986 allows these units to slip in without any analysis of their impact on highway capacity, overuse of other infrastructure, or Big Sur’s natural resource. Instead, starting the VSU count *when the analysis was actually completed* in 1980 ensures that we do not inadvertently exceed the carrying capacity thoughtfully developed and laid out in the existing LUP.

Inaccurate Current Counts

The second issue is that the County appears to be undercounting the current number of VSUs on the Big Sur Coast. Members of Keep Big Sur Wild established the lodging counts for 2023 from public sources and websites, and verified the numbers by calling front desks to collect the count of all rooms now on offer. The County’s total appears to be off in this regard by at least 26 units, with additional units on offer at Fernwood, Glen Oaks, Ventana, Big Sur Campground, Post Ranch and Treebones.¹ *See* Attachment 1 (compare “2023 Count” columns from KBSW and County)

Change in Use

The third issue is the treatment of the New Camaldoli Hermitage and Esalen. In the LUP, the drafters are clear to separate these institutions from the eight “motels, lodges, or inns.” LUP § 5.1.4 (“The New Camaldoli Hermitage, run by a Benedictine Order, has 11 rooms which are available with the Hermitage’s permission for use as a retreat. Esalen, a nationally known institution, offers accommodations for 90 people enrolled in education programs.”) Based on the structure of the LUP—wherein motels, lodges, or inns are treated differently from spiritual and educational retreats—it appears likely that the drafters did not consider Esalen and the Hermitage as Visitor

¹ To prevent confusion, this analysis does not include a discussion of short-term rentals or special event venues, which represent additional VSUs and are currently operating in Big Sur without permits. However, these units—which often include multiple bedrooms—should count against the 300 unit cap.

Kate Daniels
Martha Diehl
September 26, 2023
Page 4

Serving Units at the time. Guests arrived, mostly remained on-site engaging in retreat or educational programs, and did not overtax the highway or other destination infrastructure.

However, use of the Hermitage and Esalen have changed in the 43 years since the LUP's development. At the time of the original count, the Hermitage offered a retreat of total solitude, with meals served through the wall, for a voluntary donation. Esalen was considered a serious educational institute with world renowned scholars and teachers on staff, full time seminars and workshops where students remained on campus for weeks at a time. Today, however, these establishments are no longer for solitary retreats by donation or full time educational seminars. They now operate as an inn and a full service resort for short-term stays—with resulting impacts in the LUP area. As such, they should be counted as 71 new “visitor-serving lodge or inn units.” *See* Attachment 1 (noting 71 new units added for these businesses).

Rights to Develop

Finally, the LUP explains that Westmere has the ability to develop 24 additional units on a historic lodge property. The same is true for the 6 units at Chappellet. Because the property owners may be considered to have existing entitlements, sufficient capacity in the VSU cap must be set aside for their use, further reducing the total by 30. *See* Attachment 1.

Conclusion

In sum, the County's conclusion that 235 additional VSUs may be built in the Big Sur LUP area is incorrect. Instead, all capacity has already been exhausted, including by units built between 1980 and 1986, by other units currently existing today, by the transformation in use at the Hermitage and Esalen, and by the set-aside for properties entitled to develop. By our count, the cap has been exceeded by at least 5 units. *See* Attachment 1 (bottom row concludes that 305 units have been developed, repurposed or set aside since 1980, compared to the County's 91).

Thank you for consideration of this important issue. If you have any questions or would like to discuss further, please let me know via the contact information above.

Kate Daniels
Martha Diehl
September 26, 2023
Page 5

Sincerely,

SHUTE, MIHALY & WEINBERGER LLP



Sara A. Clark

Attachments

cc: Mary Adams (district5@co.monterey.ca.us)
Dawn Addis (Dawn@DawnAddis.org)
Dick Ravich (bigsur@spynet.com)
Steve Beck (stevebeck2@gmail.com)
Dave Smiley (dsmiley595@gmail.com)
Marcus Foster (marcusfoster69@gmail.com)

1681800.3

Attachment 1

	Address	KBSW Calculations			County Calculations		
		1980 Room Count	2023 Room Count	Added Units	1986 Room Count	2023 Room Count	Added Units
Motels, Lodges, & Inns							
Big sur Lodge	47225 Highway 1	61	62	1	62	62	0
Big Sur River Inn	46800 Highway 1	18	22	4	22	22	0
Deetjen's Big Sur Inn	48865 Highway 1	14	20	6	20	20	0
Fernwood Resort	47200 Highway 1	11	33	22	25	31	6
Glen Oaks Big Sur	47080 Highway 1	15	30	15	16	26	10
Lucia Lodge	62400 Highway 1	10	10	0	10	10	0
Ripplewood Resort	47047 Highway 1	17	17	0	17	17	0
Alila Ventana Big Sur	48123 Highway 1	24	74	50	74	60	0
Gorda Springs Resort		0	14	14	4	16	12
Total		170			250		
Other Accommodations							
Rustic Cabins							
Riverside Campground and Cabins	47020 Highway 1	4	11	7	12	12	0
Big Sur Campground and Cabins	47000 Highway 1	3	25	22	24	24	0
Educational & Religious Institutions							
New Camaldoli Hermitage	62475 Highway 1	11	17	17	11	17	6
Esalen Institue	55000 Highway 1	54	54	54	54	54	0
New Developments Since 1981							
Post Ranch Inn	47900 Highway 1	N/A	43	43	0	39	39
Treebones Resort	71895 Highway 1	N/A	19	19	0	18	18
Burleigh	47600 Coast Ridge Road	N/A	1	1	1	1	0
Established Rights to Develop							
Westmere	38173 Highway 1	N/A	24	24	0	0	0
Chappellet	47490 Highway 1	N/A	6	6	0	0	0
TOTALS			482	305		429	91

Reference #1

Big Sur LCP Adopted by County Planners

by MARY BARNETT

SALINAS—After four years of work and four months of discussion, the Big Sur Local Coastal Program (LCP) was adopted February 11 by the Monterey County Planning Commission and recommended to the county supervisors for adoption.

Supervisors will hold a hearing March 17 on the proposed plan, which will replace the Monterey County Coast Master Plan adopted in 1962. The Local Coastal Program is required by the state Coastal Act of 1976, adopted by the state legislature to carry out Proposition 20, the coastal initiative passed in November 1972.

Most significant decisions made by planning commissioners on February 11 were:

- To slightly soften restrictions on mining in the Big Sur area, primarily affecting Graniterock Company's plans to mine limestone on Pico Blanco mountain.

- To drop a requirement for the county to enforce "prescriptive rights" to public shoreline access, where established by a history of public use.

- To drop proposed shoreline access from Wreck Beach and Coastlands Beach because of hazardous conditions "and conflicts with private property in the area."

- To drop or reroute proposed trails near Malpasos Creek and Anderson Canyon in response to protests of area residents.

- To offer a "transfer of development credits" (TDC) system to property owners with viewshed lots that can't be built on under LCP policies forbidding construction interfering with the ocean view from Highway 1.

- To ban all development on the ocean side of Highway 1 except in Big Sur Valley.

- To set 30 miles per hour as the minimum average driving speed for Highway 1. Caltrans is asked to initiate studies to determine how to regulate recreational use of the highway so service capacity doesn't fall below that level.

At its Jan. 14 meeting, the Planning Commission had approved revised language for Chapters 1 through 5 of the LCP, subject to additional public comment about sections on mineral resources and dredging, filling and shoreline structures, and highway service level provisions. A subcommittee met February 4 to review these sections and make proposals to the commission.

The only significant changes which the commission made in the subcommittee recommendations were the softening of

Graniterock thought the mining policies were too restrictive. NRDC strongly supported protective policies for Big Sur.

The "key policy" on development of mineral resources in the revised draft of January 14 said, "In general the county should avoid commitment to an increased level of extraction until other deposits in less sensitive areas are exhausted."

The text pointed out there are at least six sites in the Central Coast area in addition to Pico Blanco with limestone of similar quality. It added that many other deposits are currently being quarried and processed, including the Kaiser Limestone and Dolomite Quarry at Nativitydad.

The subcommittee on February 4 changed this policy. Reference to other deposits was removed from the key policy, and the concept of "balancing" environmental and economic values was introduced. This sentence was added: "The county shall evaluate any proposal for an increased level of extraction based upon a thorough balancing of the environmental and recreational values long recognized to exist on the Big Sur coast and the economic values of any mineral deposit."

In the subcommittee's Feb. 4 version, the first policy under the heading "General Policies" read, "Surface mining proposals for minerals or materials which are also available from inland or less sensitive locations shall be denied."

Upon motion of commissioner S. Gary Varga, the words "adequately and economically" were inserted after "also." The change passed on a 4-2 roll call vote. Supporting it were commissioners Varga, Peter Calitro, Manuel Jimenez and Calvin Reaves. Opposed were commissioners Joseph Sullivan and David Hendrick. Chairman Walter Basham didn't vote, because there was no tie.

Sullivan strongly objected to interjecting economic considerations into land use and environmental protection. However, Varga insisted that economics had already been interjected when the other deposits were mentioned.

Varga also led the attack on the shoreline access policy on prescriptive rights. The draft read, "Where through review of development proposals or other review, it appears that prescriptive rights may have been established through a history of public use, the county will require that a shoreline accessway remain in public use." His motion to drop the paragraph passed on a 7-0 vote.

Courts have held that a history of public use gives the public a right to use an accessway even though it is in private ownership.

Asked for his opinion, county counsel Ralph Kuchler said,

Bureau of Land Management claims prescriptive rights across private property to its lands."

Both Basham and Varga delivered brief but impassioned speeches against the whole idea of the Local Coastal Program but voted to adopt it as amended, noting that under the law they have little choice.

"I'm the only landowner in the group, and this thing scares me to death," Basham said. "It reads on private property rights which I value dearly. This plan takes land without compensation. It's primarily a recreation plan. If this thing is implemented, I question whether the county is capable of financing it. It will take a whole staff to manage it. These things have needed saving for a long time."

His remarks were applauded by some members of the audience.

Varga agreed that limitations on use of property constituted "a major taking of private land without compensation." He referred to the LCP as "the lawyer's full employment act of 1981," adding, "I vote for it with a heavy heart."

No changes were made in the Jan. 14 revised draft provisions regarding dredging, filling and shoreline structures. Basically, all three are out.

The key plan policy reads, "The natural shoreline processes, including bluff erosion and sand transport, shall not be altered by dredging, filling or construction of shoreline structures. Permitted development on the shoreline, coastal bluffs and wetlands should generally be limited to those of public health and safety needs."

County supervisors may adopt the LCP in its present form or change it. Changes must be referred back to the Planning Commission for comment. After board approval, the plan goes to the regional and state coastal commissions for review as to compliance with the Coastal Act.

A recent tentative court decision holds that the Coastal Commission may approve or reject an LCP, but cannot change it.

Generally, the Big Sur LCP is one of the most restrictive in the state because of efforts to conserve scenic views and the unparalleled beauty of the area. The plan goes beyond Coastal Act requirements in forbidding all public and private development visible from Highway 1 and major public viewing areas, with minor exceptions.

Big Sur growth is limited to an ultimate buildout of 1,000 units, including the 800 presently existing unbuilt parcels, 100



WILDFLOWERS

LARRY SECRET

- 11S** **ROCKY POINT** offers dinner and cocktails overlooking the floodlit surf at Rocky Creek. Proprietors Al and Jack oversee every detail. The steak and seafood are excellent here. (624-2933)
- 80N**
- 11.35** **PALO COLORADO ROAD** leads to **BOTTCHER'S GAP**, a Forest Service camping area. The road is narrow and winding: watch for children and animals.
- 79.7N**
- 21.5S** **MOLERA WALK-IN CAMPGROUND.** This campground is designed for foot traffic. Although there is a parking lot, no trailers are allowed. Beach access.
- 69.5N**
- 24.5S** **RIVER INN** is located at the entrance to the Big Sur Valley and provides a complex of services. The **MOTEL** has 18 units and a swimming pool on the grassy expanse next to the river. The **RESTAURANT** is open for breakfast, lunch and dinner. Full bar with live entertainment every Sunday. There is a full **GROCERY & BUTCHER SHOP** where you can purchase fresh meat. **MOBIL GAS STATION.** (667-2237)
- 66.5N**
- 24.6S** **BIG SUR CAMPGROUND AND CABINS.** Family camping available all year in a grove of redwoods. The campground has a deep swimming hole and a beach area on the Big Sur River. Volleyball court and laundry facilities. Cabins and tent-a-tent available. Full hookups. (667-2322)
- 66.4N**
- 25S** **RIVERSIDE CAMPGROUND** is 1/4 mile south of River Inn. Camp among the redwoods, or on the river. Playground and laundry facilities. Cabins tents and full hookups available. (667-241A)
- 66.3N**

BIG SUR — A GUIDE

BIG SUR — motels, restaurants, campgrounds, grocery stores, gift shops and an art gallery. Reservations are recommended in the summer and on holiday weekends. Rates are sometimes lower in the winter. For more specific information, you may write to the individual businesses. The mailing address is Big Sur, California 93920. Telephone area code is 408 unless otherwise listed. Mileages begin from **CARMEL RIVER BRIDGE** driving south and from **HEARST CASTLE** driving north.

28.1S
62.9N

LOMA VISTA is open only from April 1 through mid-November. The colorful begonia gardens are the special attraction; they also have a wide variety of cacti and succulents. Closed Wednesdays and Thursdays. **CHEVRON GAS STATION.** (667-9997)

28.8S
62.2N

VENTANA is a year-round country inn that offers elegant but casual living. There are 24 guestrooms whose private terraces overlook mountain or ocean. Heated swimming pool, hot baths and saunas. Expansion is planned in the near future. For reservations and information, phone 667-2331 or write Ventana. The **VENTANA RESTAURANT & BAR** is open from 11-10 daily. On a warm day, the outside terrace is ideal for enjoying the broad coast view. The **GENERAL STORE** has an eclectic choice of gifts, ranging from fine fabrics to quality hardware. Below the Inn and Restaurant, on the highway, **VENTANA MARKET & DELICATESSEN** carries groceries, fresh produce, cheeses, meats and salads. You can get a sandwich to take with you or to enjoy on the outside terrace. **SHELL GAS STATION.** **VENTANA CAMPGROUND** is set in a 40-acre redwood grove and is open year-round.

29.4S
61.6N

NEPENTHE has attracted people to Big Sur for years. Lunch and dinner are served in the beamed dining room overlooking the Pacific. The outside terrace offers a great view of the coastline. Visitors gather around the outside fire pit and enjoy dancing in the evenings. (667-2345)

29.4S
61.6N

THE PHOENIX SHOP features a wide selection of jewelry (American and other), crafts, books and boutique clothing. (667-2347)

30.2S
60.8N

DEETJEN'S BIG SUR INN offers food and lodging in a quaint Norwegian style setting. Nestled in the redwoods of Castro Canyon, the inn has 14 rooms (more or less). Breakfast is served from 8:30-11:30 and there are two sittings for dinner, 7 & 8:30. (667-2377)

33S
58N

COAST GALLERY is the historic showplace for Big Sur artists and coastal craftsmen, over seventy of which are currently exhibiting. Open daily between 9-6 or evenings by special appointment. (667-2301)

- among the redwoods, or on the river. Playground and laundry facilities. Cabins, tents and full hookups available. Dump. (667-2414)
- 66-3N** **25S** **66N** **25S** **66N** **25S** **66N** **25.5S** **65.5N** **25.7S** **65.3N** **26S** **65N** **26.5S** **64.5N** **27.6S** **28.1S** **62.9N**
- RIPPLEWOOD RESORT.** River or valley view housekeeping cabins (some with fireplaces) situated in the redwoods. Swim, fish and sun on the Big Sur River. The resort also houses a GROCERY STORE and a NEW SPECIALTY CAFE. Hours 8-10. CHEVRON GAS STATION. (667-2242)
- GLEN OAKS MOTEL** is an attractive, modern post adobe motel in gracious garden setting. 15 clean and comfortable units are available all year. (667-2105)
- PANNY'S** offers complete hair services for men and women. Call 667-2101 for appointments.
- GLEN OAKS RESTAURANT.** Breakfast and dinner. Specialties: seafood, fresh vegetables, Monterey Co. wines. (667-2623)
- ST. FRANCIS OF THE REDWOODS.** Catholic chapel. Mass 4 p.m. Saturday.
- FERNWOOD** is an all-purpose stop. The RESTAURANT & BAR offers breakfast, lunch and dinner in a congenial setting. A GROCERY provides camping and household necessities. Lodging can be had at the 11-unit MOTEL or at the CAMPGROUND situated in the redwoods on the Big Sur River. Full hookups available. UNION 76 GAS STATION. (667-2422)
- PFEIFFER BIG SUR STATE PARK** will be open only in the summers for the next few years. The 810-acre park offers camping (218 sites, no hookups, sanitation station), picnicking, fishing, hiking and river wading. Regular campfire programs are held and the rangers conduct nature walks and hikes.
- BIG SUR LODGE,** within the park, is open all year long. All park activities are included for guests of the Lodge. There are 61 cottages, some with fireplaces and others with kitchens. Deer often graze on the broad lawn areas that surround the cottages and heated swimming pool. Open to both Park and Lodge visitors are fully remodeled RESTAURANT with river view dining (summers only), two GROCERY STORES, GIFT SHOP & LAUNDROMAT. For reservations, write Big Sur Lodge. (667-2171).
- U.S. FOREST STATION of the LOS PADRES NATIONAL FOREST.** As the highway begins the climb out of the Big Sur Valley, you pass this station. Permits and information are available here for backpacking into the VENTANA WILDERNESS area. Parts of the wilderness area remain closed due to the 1977 Marble Cone fire. Several major trails have been reopened, and rehabilitation work and trail construction continue. Permits required. Check with the Forest Service before making your plans. Write U.S. Forest Service District Headquarters at 406 South Mildred St., King City, CA 93930.
- SYCAMORE CANYON ROAD** is the turnoff that will take you two miles down the road to PFEIFFER BEACH. Day use only.
- BIG SUR BAZAAR** features crafts by local artists with a concentration on pottery. Recent remodeling has given the Bazaar a new look.
- by special appointment. (667-2301)
- JULIA WALKER BERRY PARK** is a small, quiet park with picnic tables along redwood-lined McWay Creek. Take the nature walk that crosses under the highway to McWay Cove where a waterfall plunges directly into the ocean. The cove is a good place to view the sea otter whose refuge area stretches along the coast. Day use only.
- ESALEN INSTITUTE** is a center to explore those trends in education, religion, philosophy and the physical and behavioral sciences which emphasize the potentialities and values of human existence. Its activities consist of seminars and workshops, residential programs, consulting and research. Reservation only. (667-2335)
- LUCIA LODGE.** Perched on the cliffs overlooking the Pacific, the lodge offers good home cooking for breakfast, lunch and dinner. Fresh baked pie is a favorite. Open until dark. 10 overnight units are available. Usually closed for the first two weeks of December. ARCO GAS STATION. (667-2476)
- LIMEKILN CREEK REDWOODS CAMPGROUNDS.** Enjoy family camping on 660 acres of privately owned land adjoining the national forest. There are miles of hiking trails, surf and trout fishing and the remains of the historic limekilns. (667-2403)
- PACIFIC VALLEY CENTER** features a GROCERY for picnic and camping supplies and a RESTAURANT whose specialty is homemade soup and pie. Breakfast, lunch and dinner from 7:30 until dark. Pacific Valley is centrally located on the coast and within easy walking distance of an accessible beach and picnic area with good surfing. ALLIANCE GAS STATION. (805-927-3083)
- SAND DOLLAR BEACH.** Forest Service picnic area. Day use only.
- JADE COVE** draws rockhounds hoping to find some of the California jade that washes up here.
- PLASKET CREEK CAMPGROUND.** Day use only. Temporarily Closed.
- WILLOW CREEK.** Forest Service picnic area. Day use only.
- GORDA.** The GROCERY carries food, camping supplies and fresh produce during the summer. SORTA GORDA, the restaurant, is open from 9-7 (5 in winter) serving breakfast, lunch and dinner. The menu has Mexican specialties, hamburgers, homemade soup and desserts. MOBIL GAS STATION. (805-927-4290)
- RAGGED POINT.** A newly expanded 20-unit motel provides lodging. Sandwiches and hamburgers are available on a take-out only basis. UNION 76 GAS STATION. (805-927-4502)
- CREDITS:**
Robin Coventry — Map
Mary Harrington — Writing
Larry Serrist — Photography
Gary Koepfel — Design
Portions reprinted with permission from

August 8, 2025

TO: Meagan Harmon, Chair California Coastal Commission
455 Market Street
San Francisco, CA 94105
Via Email: ExecutiveStaff@coastal.ca.gov,
CentralCoast@coastal.ca.gov

FROM: Marianne Gawain, President
Carmel Valley Association
PO Box 157
Carmel Valley, CA 93924

Re: Agenda Item W15a - Monterey County LCP Amendment No. LCP-3-
MCO-24-0039-1 (Vacation Rentals)

Dear Chair Harmon and Commissioners,

The Carmel Valley Association (CVA) is a community organization advocating for residents of the Carmel Valley Master Plan area within unincorporated Monterey County. Our members live adjacent to and routinely visit and/or work in the Carmel Highlands and Big Sur coastal areas. These communities are linked socially, economically, and ecologically, including in regard to the availability of affordable housing for workers in these coastal areas.

After many years of considering input from a variety of stakeholders, the Monterey County Board of Supervisors adopted a rental ordinance for the inland areas, including Carmel Valley, and finalized for Coastal Commission approval a coastal rental ordinance that would address the particular challenges of our sister communities in the coastal zone. These county ordinances balance the interests of local residents, visitors, and those wishing to operate commercial visiting-serving facilities.

The CVA strongly supports the proposed coastal vacation rental ordinance. The serious problems that we in Carmel Valley face with respect to the

need for workforce housing, and the displacement of residential rentals by short-term vacation rentals are, if anything, more pronounced in the Big Sur area. We hope that our fellow Monterey County residents living in the coastal zone can benefit from the regulation of short-term rentals that is now benefiting us in the inland areas.

As Californians we cherish coastal access for all and appreciate the central role that the Coastal Commission plays in protecting that access. Safe and convenient coastal access requires that visitors as well as locals have available basic commercial services such as grocery, restaurant and retail establishments, as well as safety services including firefighting and first-aid response. Many coastal visitors stay overnight in motels, cabin or camping facilities, or resorts. All of these enterprises must be staffed and all of their employees must have a nearby place to live. The limited carrying capacity of Highway 1 and heavy tourist traffic mean that it is not easy, safe or affordable for workers to travel hours to their jobs in Big Sur and Carmel Highlands from outside the area.

The CVA believes that Monterey County's coastal ordinance, by protecting a modest number of housing units within coastal communities for local workforce housing rather than for use as commercial mini-hotels, supports the environmentally sustainable provision of critical visitor services, making safe and convenient coastal access possible for the visitors with a wide range of needs, abilities and resources.