



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", with a stylized flourish at the end.

Michael Delapa, Executive Director
LandWatch Monterey County