January 27, 2024

Subject: CEQA comments regarding Short Term Rental DEIR

Carmel Valley Association (CVA), in harmony with LandWatch comments on this DEIR, urges adoption of the Alternative # 6. “This restriction on commercial STRs would still

permit Carmel Valley residents to participate in the limited STR market and to provide visitor

accommodations to support the local economy, but without displacing long-term housing. Alternative 6 would substantially reduce the displacement of existing long-term housing because there are relatively few single-family dwellings available for conversion to commercial STRs located in the non-residentially zoned areas in the Carmel Valley. Furthermore, the requirement that the owner or operator remain in full-time residence in agricultural areas would also serve to minimize conversion of single-family units in those areas.

CVA agrees with LandWatch that the best way to preserve the residential character of residential zoning districts of the Carmel Valley Master Plan area, while maintaining the potential to provide financial benefits to offset the high cost of living in Monterey County for owner-occupied Limited Vacation Rentals, would be to ensure that Commercial Vacation Rentals would not operate in residentially zoned neighborhoods.

Most complaints CVA has received from residents regard non-owner-occupied use of residential property for remuneration, often managed by a contracted third party, seldom permitted, and many even not paying the required TOT. Removing these from the neighborhoods will help to ensure that the vacation rentals are operated in a manner that complies with all rules and regulations to protect the health, safety, and welfare of residents.

CVA thanks the HCD for this opportunity to comment on the DEIR of the draft new vacation rental ordinances.

 **C.S. Noel**



President,
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