

# MONO COUNTY PLANNING COMMISSION

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Bridgeport, CA 93517  
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[www.monocounty.ca.gov](http://www.monocounty.ca.gov)

## SPECIAL MEETING AGENDA

August 21, 2025 – 9:00 a.m.

Mono Lake Room  
1290 Tavern Rd  
Mammoth Lakes, CA 93546

This meeting will be held in person at the location listed above. Additionally, a teleconference location will be available where the public and members of the Commission may participate by electronic means. Members of the public may participate in person and via the Zoom Webinar, including listening to the meeting and providing comment, by following the instructions below.

### TELECONFERENCE INFORMATION

**1. Mammoth Teleconference Location** -Bridgeport CAO Conferences Room, First floor Annex 1, 74 N. School Street, Bridgeport CA.

**2. Joining via Zoom**

You may participate in the Zoom Webinar, including listening to the meeting and providing public comment, by following the instructions below.

**To join the meeting by computer**

Visit: <https://monocounty.zoom.us/j/88919929655>

Or visit <https://www.zoom.us/> and click on “Join A Meeting.” Use Zoom Meeting ID: 889 1992 9655 To provide public comment (at appropriate times) during the meeting, press the “Raise Hand” hand button on your screen and wait to be acknowledged by the Chair or staff. Please keep all comments to 3 minutes.

**To join the meeting by telephone**

Dial (669) 900-6833, then enter Webinar ID: 889 1992 9655

To provide public comment (at appropriate times) during the meeting, press \*9 to raise your hand and wait to be acknowledged by the Chair or staff. Please keep all comments to 3 minutes.

*\*Agenda sequence (see note following agenda).*

**1. CALL TO ORDER & PLEDGE OF ALLEGIANCE**

**2. PUBLIC COMMENT:** Opportunity to address the Planning Commission on items not on the agenda.

**3. MEETING MINUTES**

**A.** Review and adopt minutes of June 25, 2025 (pg. 1)

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DISTRICT #1  
COMMISSIONER  
Patricia Robertson

DISTRICT #2  
COMMISSIONER  
Roberta Lagomarsini

DISTRICT #3  
COMMISSIONER  
Jora Fogg

DISTRICT #4  
COMMISSIONER  
Scott Bush

DISTRICT #5  
COMMISSIONER  
Chris I. Lizza

#### **4. PUBLIC HEARINGS**

- A. No earlier than 9:00 am: General Plan Amendment (GPA) 25-01 and modifications to Mono County Code (MCC) Chapter 5.65 to revise policies and regulations pertaining to short-term and transient rentals:** Among other changes, the revisions consolidate the permitting process, revise owner-occupancy criteria, require third-party inspections, establish a numeric cap and waitlist in June Lake, implement a waiting period before any property owner can apply for a permit, and prohibit the transfer of permits. The Planning Commission will consider policy alternatives for controversial issues and make a recommendation to the Board of Supervisors on whether to adopt the policy package. (pg. 4)

#### **5. REPORTS**

- A.** Director (pg. 294)  
**B.** Commissioners

#### **6. INFORMATIONAL/ CORRESPONDENCE**

- 7. ADJOURN** to the Scheduled Special Meeting on September 18, 2025, at 9:00 am.

**NOTE:** Although the Planning Commission generally strives to follow the agenda sequence, it reserves the right to take any agenda item – other than a noticed public hearing – in any order, and at any time after its meeting starts. The Planning Commission encourages public attendance and participation.

In compliance with the Americans with Disabilities Act, anyone who needs special assistance to attend this meeting can contact the Commission secretary at 760-924-1804 within 48 hours prior to the meeting to ensure accessibility (see 42 USCS 12132, 28CFR 35.130).

\*The public may participate in the meeting at the teleconference site, where attendees may address the Commission directly. Please be advised that Mono County does its best to ensure the reliability of videoconferencing but cannot guarantee that the system always works. If an agenda item is important to you, you might consider attending the meeting in Bridgeport.

Full agenda packets, plus associated materials distributed less than 72 hours prior to the meeting, will be available for public review at the Community Development offices in Bridgeport (Annex 1, 74 N. School St.) or Mammoth Lakes (1290 Tavern Rd, Mammoth Lakes, CA 93546). Agenda packets are also posted online at [www.monocounty.ca.gov](http://www.monocounty.ca.gov) / departments / community development / commissions & committees / planning commission. For inclusion on the e-mail distribution list, send request to [hwillson@mono.ca.gov](mailto:hwillson@mono.ca.gov)

Commissioners may participate from a teleconference location. Interested persons may appear before the Commission to present testimony for public hearings, or prior to or at the hearing file written correspondence with the Commission secretary. Future court challenges to these items may be limited to those issues raised at the public hearing or provided in writing to the Mono County Planning Commission prior to or at the public hearing. Project proponents, agents or citizens who wish to speak are asked to be acknowledged by the Chair, print their names on the sign-in sheet, and address the Commission from the podium.

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## Draft Minutes

June 25, 2025 at 1:30 pm

Bridgeport Board Chambers  
2nd floor County Courthouse  
278 Main Street  
Bridgeport, CA 93517

Zoom: <https://monocounty.zoom.us/j/83314694140>

**COMMISSIONERS:** Jora Fogg, Roberta Lagomarsini, Chris Lizza, Scott Bush, Patricia Robertson

**STAFF:** Heidi Willson, planning commission clerk; Emily Fox, County Counsel; Aaron Washco, planning analyst; Olya Egorov, planning analyst; Wendy Sugimura, director

**PUBLIC:** Heidi Vetter, Chris Cloyd, Lydia March, Kathy

*\*Agenda sequence (see note following agenda).*

### 1. CALL TO ORDER & PLEDGE OF ALLEGIANCE

Meeting called to order at 1:31 pm and the Commission lead the Pledge of Allegiances.

### 2. PUBLIC COMMENT: Opportunity to address the Planning Commission on items not on the agenda

- No public comment.

### 3. CONSENT AGENDA ITEMS

#### A. Review and adopt minutes of May 15, 2025

**Motion:** Approve minutes as presented.

Motion by Fogg; Lagomarsini second.

*Roll-call vote – Ayes: Bush, Robertson, Fogg, Lagomarsini, Lizza.*

Motion Passes 5-0.

### 4. PUBLIC HEARING

#### A. No earlier than 1:30 pm. UP 25-003 KURO LLC VHR –Applicant requests a vacation home rental in an existing condominium at the Edgewater Condos #10 located at 112 Knoll Avenue in June Lake (APN # 015-076-010-000). The 1.35-acre property has a Land Use Designation of Multi-Family Residential, High (MFR-H) and the project is subject to Chapter 26 of the Mono County General Plan. (Staff: Olya Egorov)

- Egorov gave a presentation and answered questions from the Commission.
- Public Hearing Opened at 1:59 pm.
- Public Comments provided by the applicant Rene Rosanco. Additional public comment received by Chris Cloyd, Jeff Voorheis, Lisa Trottier, Conner Lear, Kathy Paul.

DISTRICT #1  
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DISTRICT #4  
COMMISSIONER  
Scott Bush

DISTRICT #5  
COMMISSIONER  
Chris I. Lizza

- Public Hearing Closed at 2:26 pm.
- Commissioner Deliberated the project, which included questions to, answers from, and exchanges with staff and the applicants.

**Motion:** Find that the project qualifies as a categorical exemption under CEQA guidelines §15301, and instruct staff to file a Notice of Exemption, determine that the required findings can be made including finding C and D, and approve Use Permit 25-003.

Motion Fogg; Lagomarsini second.

*Roll-call vote – Ayes: Bush, Fogg, Lagomarsini, Lizza. Nay: Robertson*

Motion Passes 4-1.

- B. **No earlier than 1:50 pm. UP 25-004 Valletta VHR-** Applicant is seeking a vacation rental permit for two of four multi-family residential units located at 34 Foster Avenue in June Lake (APN:015-111-032-000). The parcel is 0.23 acres and has a land use designation of Mixed Use (MU). The project is subject to Chapter 26 of the Mono County General Plan and staff is recommending denial. (*Staff: Aaron Washco*)

- Washco gave a presentation and answered questions from the Commission.
- Public hearing opened at 3:28 pm.
- Public comment provided by the applicant Devin Valletta. Additional public comment made by Lydia March.
- Public hearing closed at 3:51 pm
- Commissioners deliberated the project, which included questions to, answers from, and exchanges with staff and the applicants.
- Additional language added to condition 3 for long-term rental as follows: Two (2) of the four (4) units may be used as a short-term rental. So long as any of the two units eligible for short-term rental is used as a short-term rental for any duration, the other two of the four units must be offered and maintained as a long-term rental at or below market rate rent for a similar sized unit, as determined by the Mono County Housing Opportunities Manager. Every six (6) months, the Use Permit holder must submit an affidavit to the Office of the Mono County Administrative Officer, attention Housing Opportunities Manager, regarding the rental status of the unit required to be maintained as a long-term rental. Such affidavit shall attach current leases with a long-term tenants, or if the unit is not occupied, shall attach evidence of good faith efforts to let the property, including any and all advertisements made in local media or online. A vacancy in the long-term rental unit of three (3) or more months without adequate showing of a good faith effort to let the unit may be grounds for revocation of this Use Permit.

**Motion:** Find that the project qualifies as a categorical exemption under CEQA guidelines §15301, and instruct staff to file a Notice of Exemption, make the required findings as contained in the staff report, required findings can be made with the additional language to condition 3 that was added during deliberation, and approve Use Permit 25-004.

Motion by Bush; Lagomarsini second.

*Roll-call vote – Ayes: Bush, Robertson, Lagomarsini, Lizza. Recused: Fogg*

Motion Passes 4-0 with one recusal.

## 5. INFORMATIONAL/CORRESPONDENCE

- A. Mono County Housing Survey



**6. REPORTS**

- A. Director- Sugimura went over the report provided and provided a staffing update.
- B. Commissioners- Commissioner Robertson provided a report.

**7. ADJOURN at 4:15pm** to scheduled Special Meeting on July 17, 2025, at 9:00 am.

# Mono County Community Development Department

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## Planning Division

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August 21, 2025

**TO:** Mono County Planning Commission

**FROM:** Wendy Sugimura, Director  
Olya Egorov, Planning Analyst  
Aaron Washco, Former Planning Analyst

**RE:** Short-Term Rental Policy Package for Recommendation

### RECOMMENDATIONS

It is recommended that the Mono County Planning Commission take the following actions:

1. Hold a public hearing on General Plan Amendment (GPA) 25-01 and modifications to Mono County Code (MCC) Chapter 5.65, receive public comment, deliberate the amendments and alternatives proposed, and make any desired changes;
2. Following the public hearing and deliberation, direct staff to incorporate any desired policy alternatives or amendments and adopt Resolution 25-01 finding the amendments qualify as an exemption under CEQA §15301 and recommending that the Board of Supervisors make the required findings and adopt GPA 25-01 and modifications to MCC Chapter 5.65.

Alternatively, the Planning Commission may choose not to make the required findings and/or recommend the Board not adopt proposed GPA 25-01 and/or the modifications proposed to MCC Chapter 5.65.

### BACKGROUND

Mono County enacted an emergency moratorium on new short-term and transient rentals, collectively referred to as visitor rentals, in all single-family residential units regardless of land use designation from May 3, 2022, to April 29, 2024, to study the impacts of short-term rentals on long-term housing for residents. During the moratorium, the County completed a study on short-term rentals, an online survey for public input on short-term rental issues, five public outreach meetings through the Regional Planning Advisory Committees (RPACs), and a workshop with the Planning Commission.<sup>1</sup> Data, information, and analysis were presented to the Board of Supervisors

<sup>1</sup> See the February 20, 2024, Board of Supervisors meeting for the study and online survey results: [https://www.monocounty.ca.gov/sites/default/files/fileattachments/board\\_of\\_supervisors/meeting/33423/02\\_february\\_20\\_2024\\_agenda\\_packet.pdf](https://www.monocounty.ca.gov/sites/default/files/fileattachments/board_of_supervisors/meeting/33423/02_february_20_2024_agenda_packet.pdf) starting on p. 53 for the study, and [https://www.monocounty.ca.gov/sites/default/files/fileattachments/board\\_of\\_supervisors/meeting/33423/2-20-24\\_item\\_7b.-\\_presentation.pdf](https://www.monocounty.ca.gov/sites/default/files/fileattachments/board_of_supervisors/meeting/33423/2-20-24_item_7b.-_presentation.pdf) for survey results. Accessed 8/12/2025.

at public meetings in 2024 on February 20, April 2, April 16, and June 18 during which the Board provided policy direction.

Revised General Plan and MCC Chapter 5.65 policies, regulations, and standards were developed based on the work in 2024 and were reviewed at five RPAC meetings in May 2025 for further public input. Public outreach details are provided in Attachment 1 under the "Public Engagement & Research" section.

A redline version of the proposed modifications to the text of the Mono County General Plan (MCGP) Land Use Element (LUE) and MCC Chapter 5.65 are provided in Exhibit A of Resolution 25-01 (Attachment 2). The clean version is available online at <https://www.monocounty.ca.gov/community-development/page/short-termtransient-rentals>.

GPAs and amendments to the Mono County Code must be adopted by the Board of Supervisors. GPAs require a recommendation from the Planning Commission to the Board. In this case, the entire policy has been packaged for a single recommendation by the Planning Commission to the Board of Supervisors (Attachment 2).

## DISCUSSION

To ensure an understanding of the history, data, information, and rationale that resulted in proposed amendments, a report of the policy update has been prepared (see Attachment 1). In the report, the purpose of the policy set has been set forth as follows:

- Prioritize personal residential use in residential units, regardless of land use designation, whether for the owner or long-term renting.
- Continue to support a "sharing model" whereby a resident property owner with excess capacity may supplement his/her income, which is different from purchasing assets with the intent of or need for generating income.
- Prevent the loss of residential housing to a visitor lodging business model.
- Prevent the commodification of residential housing due to the inclusion of an income-generating use like visitor rentals, however indirectly, in the sales price.

Policy modifications fell into the following seven categories, and then several issues were outside the scope of the policy work:

1. Limit or decrease the number of existing short-term rentals.
2. Prevent neighborhood impacts and nuisances.
3. Discourage business investment in, or commodification of, housing.
4. Preserve and encourage workforce housing units.
5. Increase the available visitor bed base without affecting the availability of community housing.
6. Create an equitable permitting process.
7. Reporting and code enforcement.

Within these categories, the following issues appeared to be controversial during the May 2025 public outreach:

- Establish a numeric cap on short-term rental permits in June Lake.
- Require a waiting period after the sale of a unit and after completion of new construction before the property owner can apply for an STR permit.
- Develop an incentive program that leverages STR permits in exchange for community housing.
- Consolidate all visitor rental permits under one system.

These issues have been extracted from the policy set for further discussion, and alternatives are offered for consideration. See Attachment 1, Policy Alternatives section.

## **ENVIRONMENTAL COMPLIANCE**

The proposed amendments are consistent with a Class 1 Categorical Exemption under §15301 of the California Environmental Quality Act (CEQA). Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use. Visitor rentals are used in a manner not substantially different from occupancy by full-time residents, whether owners or long-term renters. Whether a unit is used for long-term or short-term/nightly occupancy does not change or expand the residential activities occurring on the property, which includes sleeping and eating. Visitor rentals will be subject to MCC Chapter 5.65, which addresses aesthetics, noise, parking, utilities, and other concerns. Thus, use of a residential unit on a short-term basis is not more intensive than the conversion of a single-family residence to office use.

## **MONO COUNTY GENERAL PLAN CONSISTENCY**

See Section Four of Resolution 25-01 (Attachment 2).

## **NOTICING**

GPA's are subject to the noticing requirements under Chapter 46 of the MCGP LUE, which includes a notice in a newspaper of general circulation at least ten days in advance of the public hearing. The policy package was noticed in the August 9 edition of The Sheet (see Attachment 3).

## **PUBLIC COMMENTS**

No written comments were received prior to publication of this staff report.

## **ATTACHMENTS**

1. Short-Term Rental Policy Update Report
2. Resolution 25-01 with Exhibit A: Amendments to the General Plan and Mono County Code Chapter 5.65.
3. Public Hearing notice

## **SHORT-TERM RENTAL POLICY UPDATE REPORT**

August 14, 2025

Prepared for: The Mono County Planning Commission

Prepared by: The Mono County Community Development Department

## Table of Contents

Introduction.....	5
Purpose.....	5
Public Involvement & Research .....	6
Phase I – Research.....	8
Phase II – Public Input on Policy Development.....	9
Phase III – Public Input on Proposed Policies .....	10
Real Estate Community .....	12
Proposed Amendments.....	14
Issue 1: Limit or Decrease the Number of Existing Short-Term Rentals .....	15
A.    Establish a numeric cap on short-term rental permits in June Lake.....	15
B.    Implement a first-come, first-serve waitlist in June Lake.....	16
C.    Consider amending the definition of short-term rentals to include fractional ownership and/or timeshares on residential properties. ....	16
D.    Encourage neighboring jurisdictions to regulate short-term rentals.....	16
Issue 2: Prevent Neighborhood Impacts and Nuisances.....	16
E.    Retain existing permitting requirements that address neighborhood impacts and nuisances.....	16
F.    Increase compliance standards for all short-term rentals. ....	17
Issue 3: Discourage Business Investment In or Commodification of Housing.....	17
G.    Require a waiting period before any new property owner can apply for a short-term rental permit for an existing unit.....	17
H.    Require a waiting period before any new property owner can apply for a short-term rental permit for new construction.....	17
I.    Require a waiting period before any property owner can apply for a short-term rental permit where a property had a no-fault eviction.....	18
J.    Prohibit the transfer of short-term rental permits to a new property owner and do not allow such permits to run with the land.....	18
K.    Limit short-term rental permits to one per natural person.....	18
Issue 4: Preserve and Encourage Workforce Housing Units .....	18
L.    Develop an incentive program that leverages short-term rental permits in exchange for community housing.....	19

Issue 5: Increase Available Visitor Bed Base Without Affecting the Availability of Community Housing.....	19
M.    Revise owner-occupancy language to “hosted” short-term rentals.....	19
N.    Allow residents to reside in an accessory dwelling unit and rent the primary residence on a short-term basis.....	19
Issue 6: Create an Equitable Permitting Process.....	20
O.    Consolidate the permitting process into a single unified procedure with a single set of terms and requirements for all permits, regardless of Land Use Designation. ....	20
P.    Create a universal tracking system. ....	20
Q.    Continue to require annual renewals for all short-term rental permits.....	21
Issue 7: Reporting and Code Enforcement.....	21
R.    Continue to collect data on code compliance cases. ....	21
S.    Track and report transient occupancy tax revenue from short-term rentals.....	21
T.    Track and report permit activity and trends in the annual report or as requested by the Board.....	21
Policy Alternatives.....	21
1.A. Numeric Cap in June Lake.....	22
The Data.....	22
Discussion.....	23
Policy Alternatives .....	24
Recommendation .....	24
3.G. & 3.H. Waiting Period – After Sale and New Construction.....	24
The Data.....	24
Discussion.....	25
Policy Alternatives .....	25
Recommendation .....	25
4.L. Incentive Program for Workforce Housing.....	25
The Data.....	25
Discussion.....	27
Policy Alternatives .....	27
Recommendation .....	28
6.O. Consolidate all Visitor Rental Permits under One System .....	28

Background.....	28
Alternatives: Condominiums in June Lake .....	29
Discussion.....	31
Recommendation .....	32
Attachments .....	32



## INTRODUCTION

On May 3, 2022, the Mono County Board of Supervisors (Board) imposed Ordinance 22-03 (ORD 22-03), which placed a moratorium on new applications for short-term and transient rentals (rentals of 30 days or less), collectively referred to as visitor rentals, in all single-family residential units regardless of land use designation. The moratorium was adopted as an urgency measure under Government Code §65858 and was extended on June 14, 2023, for an additional 22 months and 15 days to the maximum length of two years. The moratorium expired on April 29, 2024.

The moratorium was enacted due to concern that short-term rentals (STRs) may be contributing to lack of housing for workforce and full-time residents in Mono County due to loss of units and increased prices due to commodification of housing, and is therefore a potential threat to public health, safety and welfare. The intent of its adoption was to allow time to study the effects of short-term and transient rentals on the housing market in Mono County.

Mono County contracted with MIG, Inc. (together with BAE Urban Economics, Inc.; collectively, Consultants), in September 2023 to conduct the study. The study scope was approved by the Board in October 2023. The scope for the study included an online survey (Online Survey or Survey) to understand public perception surrounding short-term rentals and their impact on public welfare and was completed in February 2024. The study and Survey were also accompanied by two rounds of community outreach through the Regional Planning Advisory Committees (RPACs), two workshops with the Planning Commission, and four workshops with the Board of Supervisors.

Based on this data, input, and direction, General Plan Amendment (GPA) 25-01 and modifications to Mono County Code (MCC) Chapter 5.65 (collectively, Project) was developed and includes options and alternatives for controversial policies.

## PURPOSE

Like many jurisdictions, Mono County has been experiencing challenges with housing availability and affordability for the workforce and local, year-round residents. Many factors contribute to the situation, and a variety of strategies are necessary for a comprehensive solution. Regulating short-term rentals is only one small part of the big picture.

Interestingly, in June Lake where the policies are the most controversial and STRs are most prevalent, the community hosts 811 housing units for a population of 611 people (2020 Census). Theoretically, the numbers indicate every single resident in June Lake could own a home and 200 excess units would still be available. At the unincorporated countywide level, 4,214 housing units are available for a population of 5,760 (2020 Census). Similarly, since the moratorium expired on April 29, 2024 (see Public Involvement & Research section below), one new unit has been constructed in June Lake while 13 STR applications have been received and two have been

granted. The math for this time period indicates STRs are reducing the available housing stock for other residential uses.

In the Survey, 72% (68 of 94) of respondents who do not own an STR and live in the unincorporated county cited high housing prices as the main housing challenge in Mono County. Lack of housing availability (65%) was the second greatest challenge, followed by the cost of construction (51%), lack of skilled labor (33%), and state and local regulations or restrictions (32%). Of short-term rental owners or operators, 54% cited both high housing prices and lack of housing availability, followed by cost of construction (46%). The following options all came in at 31%: lack of suitable land, infrastructure, and skilled labor; and state and local regulations or restrictions. For both groups, high housing prices and lack of housing availability were the top two housing problems.

Based on the data, public input, and direction from public discussions received to date, the purpose of the policy revisions are proposed as follows:

- Prioritize personal residential use in residential units, regardless of land use designation, whether for the owner or long-term renting.
- Continue to support a “sharing model”<sup>1</sup> whereby a resident property owner with excess capacity may supplement his/her income, which is different from purchasing assets with the intent of or need for generating income.
- Prevent the loss of residential housing to a visitor lodging business model.
- Prevent the commodification of residential housing due to the inclusion of an income-generating use like visitor rentals, however indirectly, in the sales price.

The policy revisions are NOT intended to create or generate community or workforce housing units, or directly or unilaterally solve the workforce housing issues in Mono County. These policies primarily affect the housing marketplace and are one strategy in a larger housing effort.

## PUBLIC INVOLVEMENT & RESEARCH

This section provides an overview of the public involvement and research that factored into the Project. Engagement and research occurred over a two-year period (see Table 1). Overall, more than 200 members of the public provided input and contributed to the development of the proposed amendments.

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<sup>1</sup> Consistent with Mono County General Plan Land Use Element **Policy 1.M.2. Short-term rentals in single-family residential neighborhoods should support a model for the supplemental sharing of excess assets, rather than a full business or investment model.**

<b>Table 1: Public Involvement and Research Overview</b>			
	<b>Activity</b>	<b>Date(s)</b>	<b>Purpose</b>
<b>Phase I – Research</b>	Short-Term Rental Housing Survey	December 21, 2023, to February 1, 2024	Understand public perception surrounding short-term rentals
	Short-Term Rental Housing Study	Published on February 12, 2024	Understand the issue and provide an array of policy options
	Board Meeting	February 20, 2024	Seek input on policy options
<b>Phase II – Public Input on Policy Development</b>	RPAC Workshops	March 6, 2024 (June Lake CAC) March 7, 2024 (Antelope Valley) March 13, 2024 (Mono Basin) March 14, 2024 (Bridgeport Valley) March 21, 2024 (Long Valley)	Present Study and Survey findings and conduct “sticker” exercise to gather input on policy options
	Planning Commission Meeting	March 21, 2024	Present Study and Survey findings, share results from the March 2024 workshops, and gather input on policy options
	Board Meeting	April 2, 2024	Share results from the March 2024 workshops, identify directives, and address the moratorium
	Board Meeting	April 16, 2024	Consider adoption of Resolution 24-038
	Board Meeting	June 18, 2024	Present and refine proposed amendments
	Tribal Consultation	April 11, 2025, to July 18, 2025	Provide opportunities for consultation to the Tribes in accordance with SB 18
<b>Phase III – Public Input on Proposed Policy Amendments</b>	RPAC Workshops	May 1, 2025 (Antelope Valley) May 7, 2025 (June Lake CAC) May 8, 2025 (Bridgeport Valley) May 14, 2025 (Mono Basin) May 22, 2025 (Long Valley)	Present the proposed amendments and gather input
	Planning Commission Meeting	May 15, 2025	Present the proposed amendments, share results from the May 2025 workshops, and gather input
	Planning Commission Site Visit – June Lake	June 13, 2025	Visit neighborhoods in June Lake to better understand policy issues
	Public Hearing – Planning Commission	August 21, 2025	Provide a recommendation to the Board of Supervisors

	Public Hearing – Board of Supervisors	TBD	Consider adopting the Project
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## PHASE I – RESEARCH

The initial research phase of the project included two main components: (1) an Online Survey to understand public perception, opinions, and experiences with STRs; and (2) a study on short-term rentals (2024 STR Study or Study).

### Online Survey

To reach a variety of stakeholders and the public, a bilingual online survey was published on December 21, 2023. Mono County emailed bilingual flyers with a QR code to the RPAC list serve on December 26, 2023. In addition, flyers were shared with RPAC members and other community organizations to post at popular locations around each community. The Online Survey closed on February 12, 2024, and was available for a total of 38 days.

The Survey received 272 responses, of which 129 were retained. Of those responses, 35 were from owners or operators of STRs, and the remaining 94 responses came from residents who do not own or operate an STR. Responses from STR owners in the Town of Mammoth Lakes were included to gain insight into motivating factors, but Town residents were removed from the non-owner data set as County policies do not apply to them.

The survey data is utilized throughout this report to inform policy development and options. A complete review of the survey results, presented at the February 20, 2024, Mono County Board of Supervisors meeting, is included as Attachment A.

### 2024 STR Study

The 2024 STR Study was published on February 12, 2024, and included a literature review, policy analysis, economic analysis, stakeholder engagement, and conclusions and options. The literature review summarized research and analysis of over 50 academic articles and industry publications related to how STRs are regulated to help inform best practices to consider. The policy analysis identified options for the County to consider to better regulate STRs to meet both community and County goals. The economic analysis summarized information and data related to Mono County's housing market conditions and trends, tourism accommodation industry trends, and induced Workforce Housing Demand. The stakeholder engagement summarized community ideas and feedback received during a series of focus group discussions. Conclusions and options identified potential policy objectives related to STR regulations and housing, and options to achieve those objectives. The 2024 STR Study is included as Attachment B, and the summary of the 2024 STR Study and policy options presented to the Board at the February 20, 2024, meeting is included in Attachment C.

Stakeholder engagement for the 2024 STR Study consisted of six focus groups with a total of 18 participants. The focus groups targeted those who own or operate short-term rentals as well as

those involved in housing development and/or advocacy, tourism, or local business in unincorporated Mono County. Participants were asked four questions during a 45-minute conversation. Common themes from the six focus groups included:

- **Data:** More data is needed to inform discussions
- **Time and Resources:** Current policies and regulations are working versus housing should be addressed now
- **Issues of Scale:** More housing development to improve the housing situation versus incremental increases to the available long-term housing stock will address the housing issue
- **Equity v. Ownership Rights:** Mono County should promote equity through affordable housing versus Mono County should not dictate how a property is rented
- **Location-Specific Solutions:** Community-based solutions should be prioritized
- **Longstanding Issue:** Housing has been a challenge prior to the conversation on short-term rentals

The 2024 STR Study concludes that there has been a long-standing issue with the shortage of affordable housing in Mono County. The data and research currently do not identify a clear correlation between short-term rentals and housing in the unincorporated area as a whole, potentially due to small sample size. However, June Lake may have a stronger correlation due to the higher number of STRs and the high concentration of short-term rentals in the Town of Mammoth Lakes could be pushing the local workforce toward the unincorporated areas. The data identified that each new STR generates the need for about 0.8 new workforce housing units (p. 70). Current policies accomplished the goal of preventing an overwhelming increase of short-term rentals in residential land use designations while providing a portion of the visitor bed base in high tourist areas like June Lake.

#### Board Meeting – February 20, 2024

On February 20, 2024, the Survey and 2024 STR Study were presented to the Board. The Board reviewed policy options under nine objectives (see Table 3 under Proposed Amendments) and directed Community Development to host a series of public workshops to gather input on the 2024 STR Study and policy options.

## **PHASE II – PUBLIC INPUT ON POLICY DEVELOPMENT**

The Community Development Department (CDD) presented the 2024 STR Study and policy options to the public throughout March of 2024. The presentation was accompanied by a “sticker” activity where participants could “vote” for different policy options to signify their support or opposition. In total, 37 members of the public shared input (see Table 2).

<b>Table 2: Attendance During the March 2024 Workshops</b>		
<b>RPAC</b>	<b>Date</b>	<b>Attendees *</b>
June Lake	March 6, 2024	11
Antelope Valley	March 7, 2024	10

Mono Basin	March 13, 2024	7
Bridgeport Valley	March 14, 2024	4
Long Valley	March 21, 2024	2
Planning Commission	March 21, 2024	3
<b>Total</b>		<b>37</b>

\* *Excluding staff planners*

On April 2, 2024, RPAC input was provided to the Board and policy feedback from the Board of Supervisors, Planning Commission, and communities was grouped into the following categories: (1) positive response – recommended for inclusion, (2) negative response – recommended for exclusion, and (3) uncertain – policy direction requested from the Board. (See the April 2, 2024, Board meeting materials at <https://www.monocounty.ca.gov/bos/page/board-supervisors-209>.)

The Board selected directives to guide the development of the new policies and regulations and deliberated managing STRs after the expiration of the moratorium. CDD was directed to bring a resolution providing direction on processing short-term rental permits while new policies and regulations were under development. On April 16, 2024, Resolution 24-038 (R24-038) was brought back to the Board for consideration. (See Board meeting materials at <https://www.monocounty.ca.gov/bos/page/board-supervisors-211>.)

On June 18, 2024, the Board refined their direction on specific policies and regulations that were unclear, controversial, or otherwise unresolved. CDD was then directed to incorporate the revisions and prepare a policy package for consideration.

### **PHASE III – PUBLIC INPUT ON PROPOSED POLICIES**

On April 18, 2025, the policy package was finalized. Tribal consultation was invited on April 11, 2025, pursuant to Senate Bill (SB) 18. In addition, the CDD presented the policy package and received public input throughout May of 2025 including the Planning Commission and the following RPACs: Antelope Valley, Bridgeport Valley, Mono Basin, June Lake, and Long Valley.

The Planning Commission requested a tour of June Lake and its neighborhoods to ensure that local character and policy issues were adequately understood. The tour was held on June 13, 2025, and was open to the public. The following destinations were included in the tour:

- June Lake Community Center
- June Lake Village, including Edgewater Condos, The Haven, Sierra Suns
- Leonard Avenue neighborhood
- Carson View Drive and Skyline Drive neighborhood
- Interlaken Condos
- Petersen Tract
- Williams Tract, including Birch Creek Condos
- Down Canyon, including Aspen Meadows Condos and Hideaway Condos
- Nevada Street neighborhood
- Upper Clark Tract
- Lakeview Drive neighborhood

The following is a summary of RPAC feedback received during the May 2025 workshops:

### **Antelope Valley RPAC**

The discussion at the May 1, 2025, Antelope Valley RPAC meeting focused mainly on reducing regulations or exempting the Antelope Valley, as follows:

- In general, the issues related to STRs in June Lake are not applicable in the Antelope Valley planning area.
- Parcels are larger in the Antelope Valley than in communities such as June Lake, and therefore neighborhood disruptions are not an issue.
- Local residents could use the additional revenue.
- STR restrictions infringe on personal/private property rights.
- Affordable workforce housing units should be the responsibility of the County.

Suggestions were made to (1) develop an area plan for Antelope Valley which contains relaxed STR regulations, or (2) exempt the Antelope Valley and allow STRs by right. Alternatives providing for these options are not included in this policy package. If there is interest, direction should be given to develop a future amendment. Such policies would require working with the Antelope Valley community on specifics and therefore constitutes a new policy development effort.

### **Bridgeport Valley RPAC**

At the meeting on May 8, 2025, comments were in favor of and opposed to STRs. Some believed the revisions were appropriate and protected the community, and some felt STRs should be allowed outright. Some felt STRs are not needed because traditional lodging is not full on a regular basis, and others felt STRs appeal to a missing market segment in Bridgeport. Comments were made in support of the two-year waiting period and hosted rentals. The need for second homeowners to invest in their properties and participate in the local economy was raised.

### **Mono Basin RPAC**

The consensus of the Mono Basin RPAC on May 14, 2025, was to specifically support the two-year waiting periods, the rule on evictions, not allowing condos by right, and third-party inspections. Overall, comments were positive. Individual input suggested an incentive of 1:1 (one STR permit for one housing unit).

### **June Lake Citizens Advisory Committee (CAC)**

The feedback received at the May 8, 2025, June Lake CAC meeting was largely from the real estate community and is generally the opposite of general community feedback received during the March 2024 RPAC Workshops and Online Survey.

The following is a summary of feedback from the June Lake real estate community; also see the "Real Estate Community" section below:

- The 2016 policies are sufficient and are clear, effective, and supported by the public. Do not change them.

- Continue to allow June Lake condominiums as visitor rentals by right.
- Eliminate the proposed cap on visitor rentals in June Lake.
- Eliminate the proposed two-year waiting period following construction of a new unit or a change in ownership of an existing unit.
- Certainty of the ability to rent on a nightly basis is required for their clientele to move forward with purchasing a vacation home in June Lake.

The following policy alternatives were suggested:

- Provide a workforce housing incentive program rather than burdening property owners with providing workforce housing.
- Rescind R24-038 which prohibits short-term rentals at the Interlaken Condos.
- Do not implement a numeric cap on permits in June Lake.
- Do not implement a waiting period before new owners can apply for short-term rental permitting, especially for units with a history of short-term rentals.
- Continue by-right permitting (e.g., existing non-conforming) for condominium units.
- Allow STR permits to transfer with ownership, especially for units with a history of being rented on a short-term basis.
- Retain the existing policies and regulations, including June Lake neighborhood policies, without additional amendments.

In response to this feedback, the “Policy Alternatives” section outlines options for the numeric cap, waiting periods, incentives for workforce housing, and unification of permitting into a single system, which includes issues relating to June Lake condominium units.

### **Long Valley RPAC**

During the meeting on May 22, 2025, the Long Valley RPAC was generally supportive of the policy revisions and individuals made the following comments:

- Expand noticing to 1000' and increase outreach to local community.
- Further restrict STRs on a neighborhood-by-neighborhood basis.
- Maintain the tight-knit, bedroom community; STRs may be disruptive.
- Consider a waiver process for the two-year waiting period.

### **REAL ESTATE COMMUNITY**

The June Lake real estate community began submitting comments in 2025 in response to potential policy amendments. Formal letters from the Mammoth Lakes Board of Realtors (MLBOR) dated July 16 and 22, 2025, were received by Mono County, and the Community Development Department responded to the first letter (see Attachment D). The following responses are provided to the July 22 letter:



## 1. Clarifications

MLBOR continues to misrepresent the discussion at the June 13, 2025, Planning Commission meeting. The real estate community in attendance was asked to provide input on the highest priority complexes for STRs; at no time was any mention made of condominium complexes that would be “set aside for affordable housing” or where STRs would be banned. The CDD is not interested in the question MLBOR is posing and agrees it shouldn’t be answered. The reference to private conversations are not addressed in this response as they are outside the scope of CDD’s policy work.

## 2. Conflict-of-Interest Concerns Remain

MLBOR states their obligation is to provide “objective market insight.” While one could consider the question of identifying condominium complexes by highest market value for STRs a question of “objective market insight,” the County respects the right of the real estate community to decline to comment for any reason. The question was asked in good faith as part of a collaborative discussion, but any party may choose not to participate.

## 3. Next Steps and Process Concerns

- MLBOR Research: The County will review MLBOR’s survey and the County may consider the information as appropriate.
- Town Hall: MLBOR is welcome to submit any input to the County for consideration from their town hall meeting.
- Short-Term Rental Policy and Affordable Housing: As stated in the County’s letter dated July 16, 2025, policies regulating STRs are separate from policies to provide affordable housing. However, MLBOR continues to conflate the two issues, citing that the County has denied STR permits based on affordable housing needs. The County’s denials have been based on the required use permit finding of impacts to public health and safety due to the reduction of available housing stock when an STR permit is approved. By making this finding, the County is only identifying an impact to the public from STRs related to housing, which is vastly different from finding that STR regulations should generate new community housing units.

One potential policy has been added, however, in an attempt to leverage STRs as an “incentive” to construct new housing units. This policy is further discussed below (see Policy Issue 4.L). However, this is not the policy and situation the MLBOR is citing.

## 4. Conclusion

MLBOR states the County has “loosely” approached the STR policy issue and lacks verifiable data. The MLBOR should carefully review this policy paper which recounts the first round of RPAC workshops, Online Survey, 2024 STR Study results, multiple workshops with the Board of Supervisors, and then the second round of RPAC meetings. The approach has been detailed and meticulous with multiple opportunities for public engagement at a variety of

levels, and the policy basis includes research through both the informal Online Survey of public opinion and the formal research of the 2024 STR Study.

The third phase of public involvement and research concluded on July 18, 2025, after the consultation period ended for the Tribes. Community Development did not receive any requests for consultation during the 90-day period.

## PROPOSED AMENDMENTS

This section provides an overview of the issues and directives that have been incorporated into the Project. Similar directives are grouped together under an overarching issue to facilitate review (see Table 3). No changes were directed under “increase violation fees” and therefore the directive was excluded from the policy package.

Of the proposed amendments, the underlined directives were identified as controversial, particularly in the community of June Lake. Options and alternatives are presented under the “Policy Alternatives” section for these directives. The clean and redline version of the policy package, excluding the alternatives, are available in the Planning Commission and Board of Supervisors meeting packets when the policies are/were considered, and at

<https://www.monocounty.ca.gov/community-development/page/short-termtransient-rentals>.

**Table 3: Summary of Issues and Policy Directives**

**Issue 1. Limit or decrease the number of existing short-term rentals.**

- A. Establish a numeric cap on short-term rental permits in June Lake.
- B. Implement a first-come, first-serve waitlist in June Lake.
- C. Consider amending the definition of short-term rentals to include fractional ownership and/or timeshares on residential properties.
- D. Encourage neighboring jurisdictions to regulate short-term rentals.

**Issue 2. Prevent neighborhood impacts and nuisances.**

- E. Retain existing permitting requirements that address neighborhood impacts and nuisances.
- F. Increase compliance standards for all short-term rentals.

**Issue 3. Discourage business investment in, or commodification of housing.**

- G. Require a waiting period after the sale of a unit before any new property owner can apply for a short-term rental permit.
- H. Require a waiting period after completion of new construction before the property owner can apply for a short-term rental permit.
- I. Require a waiting period before any new property owner can apply for a short-term rental permit where a property had a no-fault eviction.
- J. Prohibit the transfer of short-term rental permits to a new property owner and do not allow such permits to run with the land.
- K. Limit short-term rental permits to one per natural person.

**Issue 4. Preserve and encourage workforce housing units.**

- L. Develop an incentive program that leverages short-term rental permits in exchange for community housing.

**Issue 5. Increase the available visitor bed base without affecting the availability of community housing.**

- M. Revise owner-occupancy language to “hosted” short-term rentals.
- N. Allow residents to reside in an accessory dwelling unit and rent the primary residence on a short-term basis.

**Issue 6. Create an equitable permitting process.**

- O. Consolidate the permitting process into a single unified procedure with a single set of terms and requirements for all permits, regardless of Land Use Designation.
- P. Create a universal tracking system.
- Q. Continue to require annual renewals for all short-term rental permits.

**Issue 7. Reporting and code enforcement.**

- R. Continue to collect data on code compliance cases.
- S. Track and report transient occupancy tax revenue from short-term rentals.
- T. Track and report permit activity and trends in the annual report or as requested by the Board.

**Issues outside the scope of short-term rental policies and regulations, or addressed through separate implementation and/or budgetary decisions:**

- Increase code enforcement staffing.
- Publicize the pre-approved plans for accessory dwelling units.
- Highlight State housing law.
- Offer loans and/or grants.
- Develop a renter-owner match program – a supportive policy is included.

**ISSUE 1: LIMIT OR DECREASE THE NUMBER OF EXISTING SHORT-TERM RENTALS**

Presently, the upper Clark Tract in June Lake is the only area in unincorporated Mono County that limits the number of short-term rentals; Mono City and Swall Meadows prohibit all short-term rentals. Numeric caps are the most common approach used to limit the number of short-term rentals. Placer County, Truckee, and Steamboat Springs have numeric caps in all or part of their planning areas. Typically, numeric caps are implemented with a selection system (e.g., lottery) in the event that the number of permits available is less than the number of interested permittees.

**A. Establish a numeric cap on short-term rental permits in June Lake.**

A countywide numeric cap was considered but ultimately narrowed to June Lake due to the concentration of short-term rentals. While the 2024 STR Study indicates that a high density of short-term rentals can impact housing sales and availability, it found that the effects still appear

to be minimal in June Lake.<sup>2</sup> To ensure those impacts remain limited and to also allow some room for growth, a numeric cap of 10% above the number of active permits at that time for June Lake was selected. This policy is controversial, and alternatives are provided in the next section.

*Policy Reference: MCC §5.65.050(B)*

#### B. Implement a first-come, first-serve waitlist in June Lake.

To implement the cap in June Lake, a first-come, first-serve waitlist was selected to address permit applications after the numeric cap is met. If adopted, projects would be processed from a waitlist as permits become available. Permits are expected to become available after non-renewals, changes of ownership, or revocations of a permit.

*Policy Reference: MCC §5.65.050(B-C)*

#### C. Consider amending the definition of short-term rentals to include fractional ownership and/or timeshares on residential properties.

Fractional ownership and/or timeshares of residential units is not a known problem in Mono County at this time. As a result, the definition has not been amended at this time, but a policy is included to consider it for the future, should fractional ownership and/or timeshares become a problem.

*Policy Reference: MCGP LUE Action 1.M.6.a.*

#### D. Encourage neighboring jurisdictions to regulate short-term rentals.

Neighboring jurisdictions have different regulatory frameworks for short-term rentals. The 2024 STR Study acknowledges that the high concentration of short-term rentals in neighboring jurisdictions could be pushing the workforce into the unincorporated areas of Mono County.<sup>3</sup>

*Policy Reference: MCGP LUE Action 1.M.6.b.*

## ISSUE 2: PREVENT NEIGHBORHOOD IMPACTS AND NUISANCES

Records and public feedback support the idea that the current permitting system prevents unwanted behavior in residential neighborhoods.

#### E. Retain existing permitting requirements that address neighborhood impacts and nuisances.

Mono County receives few complaints about regulated and properly permitted short-term rentals. Current regulations appear to effectively prevent nuisances and should be retained.

*Policy Reference: MCC §5.65.110*

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<sup>2</sup> Pages 21, 23, and 76, Mono County Short-Term Rental Housing Study (February 12, 2024)

<sup>3</sup> Page 77, Mono County Short-Term Rental Housing Study (February 12, 2024)

#### F. Increase compliance standards for all short-term rentals.

This policy directive was considered and narrowed to requiring third-party inspections rather than an affidavit by the homeowner. The current system does not ensure that all health and safety requirements are definitively met. The proposed amendment requires a standardized checklist to be completed by a third-party inspector accepted by Mono County.

*Policy Reference: MCC §5.65.070(A) and MCC §5.65.070(D)(4)*

### ISSUE 3: DISCOURAGE BUSINESS INVESTMENT IN OR COMMODIFICATION OF HOUSING

The Survey found that high housing prices and lack of housing availability were perceived as the top two housing problems. The 2024 STR Study found that a saturation of STRs can elevate property values in resort communities and, anecdotally, STRs may offset expenses<sup>4</sup> allowing second homeowners, rather than local community members, to purchase the home. The new policies and regulations in this section prevent the commodification of housing to moderate the market in an attempt to make housing options more reasonably available to year-round residents. Presently, Mono County does not have regulations that target the commodification of residential housing units.

#### G. Require a waiting period before any new property owner can apply for a short-term rental permit for an existing unit.

A two-year waiting period after purchase of an existing unit was selected before a new property owner could apply for a short-term rental permit. Waiting periods encourage property owners to purchase for personal residential purposes rather than to generate income for either profit or to afford the unit. This policy is controversial, and alternatives are provided in the next section.

*Policy Reference: MCC §5.65.040(H)(2), §MCC 5.65.070(D)(2), and MCC §5.65.080(D)(5)*

#### H. Require a waiting period before any new property owner can apply for a short-term rental permit for new construction.

A two-year waiting period after construction of a new unit was selected before a new property owner could apply for a short-term rental permit. This amendment seeks to discourage new construction of residential units solely for the purpose of visitor lodging, and to encourage construction for personal residential purposes rather than to generate income. This policy is controversial, and alternatives are provided in the next section.

*Policy Reference: MCC §5.65.040(H)(3), §MCC 5.65.070(D)(2), and MCC §5.65.080(D)(4)*

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<sup>4</sup> Oster, Paul. Tale of Two Properties: Condos vs. Homes. The Sheet. July 5, 2025, p. 12. Available at [https://thesheetnews.com/wp-content/uploads/2025/07/Sheet\\_07052025.pdf](https://thesheetnews.com/wp-content/uploads/2025/07/Sheet_07052025.pdf). Accessed 8/13/2025.

- I. Require a waiting period before any property owner can apply for a short-term rental permit where a property had a no-fault eviction.

A two-year waiting period after a no-fault eviction was selected before a property owner could apply for a short-term rental permit. While evictions are difficult to track, this policy seeks to reduce the allure of immediate STR income that could lead to no-fault evictions of long-term tenants.

*Policy Reference: MCC §5.65.080(D)(10)*

- J. Prohibit the transfer of short-term rental permits to a new property owner and do not allow such permits to run with the land.

STRs currently have several different permitting pathways, some of which include approvals that “run with the land” and therefore transfer with the sale of the property to a new owner. This policy seeks to prevent commodification of housing units by eliminating the transfer of STR rights with a sale. In theory, then, the sale of the house should be the value of the property, not the property plus the ability to generate income. This policy is somewhat controversial and, while not specifically extracted for a discussion of alternatives, is included in the Policy Alternatives section regarding condominiums.

*Policy Reference: MCC §5.65.060*

- K. Limit short-term rental permits to one per natural person.

At present, the limitation of one short-term rental per natural person only applies to residential land use designations. On non-residential designations, including Multi-Family Residential, a single entity could operate more than one short-term rental. The existing regulation was extended to all short-term rentals regardless of the land use designation. Language was also added to prevent transfer of STR ownership through Limited Liability Corporations (LLCs).

*Policy Reference: MCC §5.65.060*

## **ISSUE 4: PRESERVE AND ENCOURAGE WORKFORCE HOUSING UNITS**

Focus group participants were unanimous in suggesting new development is needed to address the issue of housing availability<sup>5</sup> which is outside the scope of STR policies and regulations. However, development of an incentive program that leverages STR permits in exchange for housing was explored.

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<sup>5</sup> Page 12, Mono County Short-Term Rental Housing Study (February 12, 2024)

L. Develop an incentive program that leverages short-term rental permits in exchange for community housing.

A 3-for-1 incentive was suggested during policy discussions, where an STR permit could be granted (subject applicable numeric caps) if three new community housing units were provided. Whether this incentive policy would be effective and/or enticing to developers was unknown.

To understand better how short-term rentals may be leveraged as an incentive to create community housing, SMR Development was consulted through the County's housing program. SMR Development specializes in achievable housing development, including affordable housing, and urban renewal and redevelopment. SMR Development's professional opinion is provided in a memorandum (see Attachment E) and suggests that other mechanisms are more likely to provide realistic outcomes. These incentives would be developed through the County's housing program and are outside the scope of short-term rental regulations.

Regardless, a 3-for-1 incentive policy can still be adopted and be made available for use by any interested applicant. This issue is unresolved, and alternatives are provided in the next section.

*Policy Reference: MCGP LUE Policy 1.D.9.*

## **ISSUE 5: INCREASE AVAILABLE VISITOR BED BASE WITHOUT AFFECTING THE AVAILABILITY OF COMMUNITY HOUSING.**

This section presents directives that contribute to the available visitor bed base without reducing residential housing options. Mono County supports the small-scale supplemental sharing model of short-term rentals in residential neighborhoods instead of full investments or business models.

M. Revise owner-occupancy language to "hosted" short-term rentals.

Due to recent case law, "owner occupied" language was changed to "hosted" throughout the policy package. A "host" can be an owner or tenant, which potentially supports a long-term rental use on the property in addition to the STR.

*Policy Reference: Throughout the policy package*

N. Allow residents to reside in an accessory dwelling unit and rent the primary residence on a short-term basis.

Streamlined accessory dwelling units cannot be rented on a short-term basis under state law. This policy directive was pursued to allow primary units to be used as a "hosted" short-term rentals and to allow for the small-scale supplemental sharing model of short-term rentals.

*Policy Reference: MCGP LUE §25.040*

## ISSUE 6: CREATE AN EQUITABLE PERMITTING PROCESS

The 2024 STR Study found that Mono County is the only jurisdiction that differentiates permit types for different land use designations.<sup>6</sup> Currently, a given residential unit may be subject to two discretionary approvals, one discretionary approval, or no discretionary approvals (see Table 4).

<b>Table 4: STR Approvals Under Existing Regulations</b>		
<b>Land Use Designation</b>	<b>Required Discretionary Approval(s)</b>	<b>Required Ministerial Approvals</b>
Residential	(1) Use permit (2) short-term rental activity permit	(1) Business license, (2) transient occupancy tax certificate
Non-Residential	(1) Use permit	(1) Vacation home rental permit, (2) business license, (3) transient occupancy tax certificate
Commercial Lodging – Moderate and High only *	<i>None</i>	(1) Business license, (2) transient occupancy tax certificate
Certain condo complexes in June Lake	<i>None – under existing nonconforming uses</i>	(1) Business license, (2) transient occupancy tax certificate
* In developments where units are under individual ownership		

### O. Consolidate the permitting process into a single unified procedure with a single set of terms and requirements for all permits, regardless of Land Use Designation.

Because the current system of multiple permitting pathways is difficult for the public to understand and staff to consistently explain and apply, a single permitting process was selected for all STRs, including condominium units, regardless of land use designation. The use permit and STR activity permit approval procedure was selected. This policy is controversial for condominiums in particular, and alternatives are provided in the next section.

One change that was not considered controversial was the addition of reduced permitting (by Director Review permit) for a transient lodging structure such as a hotel, motel, lodge, visitor cabin, etc. of less than 2,500 square feet in floor area, which is exempt from CEQA. This change is intended to support continued development of project specifically intended as a commercial visitor use per "Action 1.M.2.c. New construction intended for visitor lodging should be constructed to commercial lodging standards in an appropriate land use designation. ..."

Note that in the review of land use designations, short-term rentals were eliminated from Natural Habitat Protection (NHP) as they did not seem compatible with the LUD's intent to "protect sensitive environmental habitats by minimizing site disturbance and development."

*Policy Reference: CL LUD, NHP LUD, throughout the policy package*

### P. Create a universal tracking system.

Multiple departments track STR permits, and confidentiality requirements restrict access to certain data, like transient occupancy tax (TOT) licenses. Coordination to create a comprehensive

<sup>6</sup> Page 6, Mono County Short-Term Rental Housing Study (February 12, 2024)



tracking system will be developed under a separate process to better manage and understand STR data. Currently, Community Development maintains a tracking system for STR land use permits.

*Policy Reference: None – staff work item*

#### Q. Continue to require annual renewals for all short-term rental permits.

Business licenses and short-term rental activity permits must be renewed by owners on an annual basis.

*Policy Reference: Results from applying the STR activity permit requirement to all new STRs*

## ISSUE 7: REPORTING AND CODE ENFORCEMENT

#### R. Continue to collect data on code compliance cases.

This directive is supported by the Mono County General Plan. At present, code compliance data is collected and maintained under the Code Enforcement Division. Alternative systems may be implemented through a separate process.

*Policy Reference: MCGP LUE Action 1.M.5.d.*

#### S. Track and report transient occupancy tax revenue from short-term rentals.

This directive will be explored through a separate process to understand what tax information can be made available to the public.

*Policy Reference: None – staff work item.*

#### T. Track and report permit activity and trends in the annual report or as requested by the Board.

STR activity and trends will be reported in the County's annual report or as requested by the Board.

*Policy Reference: None – staff work item*

## POLICY ALTERNATIVES

Of the several proposed amendments, the following policies were identified as controversial by the real estate community in June Lake:

**Issue 1.**      **A.** Establish a numeric cap on short-term rental permits in June Lake.

**Issue 3.**      **G.** Require a waiting period after the sale of a unit before any new property owner can apply for a short-term rental permit.

**H.** Require a waiting period after completion of new construction before the property owner can apply for a short-term rental permit.

**Issue 4.** L. Develop an incentive program that leverages short-term rental permits in exchange for community housing.

**Issue 6.** O. Consolidate all short-term rental permits under one permitting system.

These issues have been extracted from the policy package for further discussion and to consider potential alternatives.

In general, feedback from the real estate community has been to leave the policies as they are for the following reasons; a County response is also provided:

**1. The current policies work well.**

*Response: While the current policies work well for addressing neighborhood nuisance issues, which were the problems being addressed in 2016, they were not crafted to address impacts to housing availability. This policy package has a different purpose.*

**2. The current policies are supported by the public.**

*Response: The current policies also appear to be generally supported by the public based on the Online Survey and RPAC Workshops except for those who favor less regulation in general and the June Lake real estate community.*

**3. The current policies create certainty for buyers which is critical for real estate transactions.**

*Response: The County has the right to discretionarily approve a use like STRs. The proposed regulations are setting a new certainty in the marketplace, which is to assume an STR is not guaranteed in a residential unit in any land use designation. The new expectation, or "certainty," that an STR use is not guaranteed is intended to eliminate an increased sales price because the unit cannot generate immediate income, which prevents the commodification of housing. If these policies are approved, buyers should enter the market with the expectation that the unit will not immediately generate income.*

## **1.A. NUMERIC CAP IN JUNE LAKE**

### **The Data**

The 2024 STR Study indicates that a high saturation of STRs has a direct effect on the housing market by increasing sales prices and decreasing housing availability for local residents and workforce. While feedback from the Survey indicates that 78% (73 of 94) of respondents who do not own an STR believe that STRs impact housing availability and affordability, no direct data connection was identified in the 2024 STR Study. Of STR owners (including those in the Town of Mammoth Lakes), only 29% (10 of 35) perceive STRs to impact housing availability and affordability. The conclusion was that Mono County remains under the saturation point where the data can identify concrete effects, but impacts are nonetheless perceived by the local population who need housing (e.g., non-STR owners). The Online Survey results indicate 29% (27 of 94) of non-STR owners had their housing situation directly impacted by an STR, with

reasons including nuisance impacts, being displaced for an STR conversion, and STRs generally increasing housing prices or limiting unit availability.

The numeric cap was posed in both the Online Survey and in the RPAC workshops. The Survey responses from individuals who believe STRs impact housing availability/affordability and support additional regulations (72% of non-STR owner respondents, or 68 of 94) were as follows:

- 59% support a countywide cap (40 of 68)
- 65% support a cap in certain areas (44 of 68)

Of the 20% (7 of 35) of STR owners who supported additional regulations, 57% (4 of 7) supported both a countywide and location-specific cap.

In contrast, RPAC outreach was not supportive of a countywide cap in 2024; 82%, or nine of 11, were in opposition. Rather, the RPAC feedback supported a cap in June Lake only:

- 100% support a cap in certain areas (9 of 9)
- 86% support a cap in June Lake (12 of 14)
  - Feedback from the June Lake CAC was split 2-2, or 50% for and 50% against.

At the February 20, 2024, Board meeting, a countywide numeric cap was considered but ultimately applied only to June Lake due to the concentration of short-term rentals (90 of 105 STRs [86%] are in June Lake). In recognition that the effects of STRs are not yet evident in the data, but to also limit the perceived and real effects experienced by local residents, a numeric cap of 10% above the number of active permits (86) at that time for June Lake was selected, or a maximum of 95 permits. The intention was to limit the number of STRs to remain under the theoretical future saturation point but also allow some room for growth.

During the May 2025 RPAC outreach, the proposed cap in June Lake was slightly controversial in Antelope Valley because some individuals favored less or no regulation on private property rights in general. In June Lake, the real estate community turned out to oppose the cap (among other policies). Otherwise, the proposed cap was not controversial during the RPAC outreach. Other RPAC comments included the following:

- Antelope Valley: One person suggested that a numeric cap for the area would address the need for long-term housing and return visitors to traditional lodging facilities.
- Bridgeport Valley: The numeric cap should be reviewed and/or updated annually.
- June Lake: One person mentioned that the numeric cap should be implemented with minimal regulations because the policy will work on its own. Another person opined that a numeric cap is not necessary if each short-term rental permit is reviewed on a case-by-case basis.

## Discussion

The policy as proposed meets the stated purpose of these STR regulations and is based on data and information gathered through the formal 2024 STR Study and informal Survey. The cap as

proposed allows for some growth in the STR market while reasonably limiting expansion to remain under the future theoretical threshold where the data would identify concrete impacts. Except for one special interest group who is directly and financially affected by the policy and those who oppose regulations in general, the policy appears to be widely accepted and supported by the public. This policy is most controversial in June Lake where the most direct impacts are felt.

### Policy Alternatives

- 1.A-1. Take no action; adopt the cap as proposed (maximum of 95 units). Only five more STR permits are available.
- 1.A-2. Remove Mono County Code (MCC) Section 5.65.050(B) and revise Section 5.65.050(D) to eliminate the cap in June Lake.
- 1.A-3. Revise MCC Sections 5.65.050(b) and 5.65.050(D) to set the cap at some other specified limit. As of July 2025, June Lake had 90 STR permits which, following the same formula, would now result in a cap of 99 total permits (an increase of four). The cap could be rounded to 100 for simplicity or set at another number.

### Recommendation

- 1.A-1. Adopt the numeric cap in June Lake as drafted under MCC Section 5.65.050(B) or 1.A-3. raise the cap to 100.

## **3.G. & 3.H. WAITING PERIOD – AFTER SALE AND NEW CONSTRUCTION**

### The Data

The 2024 STR Study found that Truckee and South Lake Tahoe implement one-year waiting periods after the purchase of a home which reduces the ability to commodify the residential unit because it cannot generate immediate income. A waiting period, specifically after the sale of a unit, was posed in both the Online Survey and during both RPAC Workshops. The Survey responses from individuals who do not own an STR but believe they impact housing availability/affordability and support additional regulations (72% of respondents, or 68 of 94) indicated that 49% (39 of 68) were in favor of a waiting period. Of STR owners who support additional regulations (7 of 35), 71% (5 of 7) supported a waiting period.

The 2024 RPAC outreach supported the waiting period with 83% (15 of 18) responding positively. In June Lake, 100% (or 4 of 4) supported the policy.

The waiting period was added as a directive in February 2024, and the two-year period was selected in April 2024. As part of these discussions, the policy was expanded to include a two-year waiting period after the construction of a new unit.

During the May 2025 RPAC Workshops, the following feedback was received:

- The Mono Basin and Bridgeport Valley RPACs were very supportive of the waiting period.

- One member of the Long Valley RPAC described the waiting period as a “double-edged sword” and asked whether the waiting period could be waived in certain scenarios. However, other public in attendance did not appear to share the same concern.
- The most significant opposition came from the June Lake real estate community. The realtors opined that the waiting period should be removed because it would reduce property demand in June Lake. One person stated that “people are not going to buy a piece of property and wait two years.”

## Discussion

The policy as proposed meets the stated purpose of these STR regulations and is based on data and information gathered through the formal 2024 STR Study and informal Online Survey. The comments in opposition appear to confirm that the policy will likely achieve the goal of discouraging commodification of residential units as it would reduce demand by those buying with the intention of generating immediate income. In general, the policy appears to be broadly supported by the public. This policy is most controversial in June Lake where the most direct impacts are felt.

## Policy Alternatives

- 3.G. & 3.H-1. Take no action. Adopt the waiting period as proposed (two years after sale or construction).
- 3.G. & 3.H-2. Revise MCC Sections 5.65.040(H)(2), 5.65.070(D)(2), and 5.65.080(D)(5) to eliminate the two-year waiting period.
- 3.G. & 3.H-3. Revise MCC Sections 5.65.040(H)(2), 5.65.070(D)(2), and 5.65.080(D)(5) to change the waiting period to some other timeframe such as one year similar to Truckee and South Lake Tahoe.
- 3.G. & 3.H-4. In addition to either 3.G. & 3.H-1 or -3, direct staff to develop criteria to waive the waiting period under certain circumstances and return at a future date with a proposed policy amendment.

## Recommendation

- 3.G. & H-1. Adopt the waiting period as proposed (two years).

## 4.L. INCENTIVE PROGRAM FOR WORKFORCE HOUSING

### The Data

The six focus groups interviewed for the 2024 STR Study were unanimous in that new development is needed to address the issue of housing availability. Although outside the scope of STR regulations, questions were included in the Survey to gain insight into the types of incentives that could potentially be effective.

According to the Survey, of the 35 STR owners, 46% use the unit as a second home, 36% as an investment property, and 18% as a primary residence; and 31% of them have rented a unit on a long-term basis. If STRs were not an option, 60% (21 of 35) would use the unit as a personal second home, 20% (7 of 35) would sell the unit, and only 14% (5 of 35) would rent long term.

Anecdotally, the County has heard that the main motivation for renting short-term is to retain the property for intermittent personal use, which was confirmed by the Survey at 60% (21 of 35) of STR owners. Only 11% (4 of 35) cited profitability as the reason for renting on a short-term basis. Similarly, 60% (21 of 35) stated no incentives would entice them to rent long term, and 23% cited financial incentives as compelling. The conclusion from the Survey data appears to be that very few alternatives are available to incentivize owners to convert to long-term rentals, but financial incentives may have the most traction.

Similarly, 80% of STR owners generally support programs or incentives that support the creation or preservation of housing for local workforce. The Survey results indicated the following support for specific programs (multiple options could be selected):

- 50% (14 of 28) – a tax fund for the development of affordable workforce housing.
- 39% (11 of 28) – a grant program incentivizing rentals to local workforce.
- 36% (10 of 28) – a loan program incentivizing the construction of ADUs for long-term rental.
- 36% (10 of 28) – a loan program incentivizing renovations for use as long-term rentals.
- 25% (7 of 28) – reduced STR permitting requirements for primary residences.
- 14% (4 of 28) – a token program granting an STR permit in exchange for deed restrictions on long-term rental units.

Following the Survey, a suggestion was made by a Supervisor to use STR permits to incentivize the development of long-term housing units (e.g., one permit for three housing units<sup>7</sup> dedicated as community housing units). The concept received eight (8) votes in favor and two (2) votes in opposition during the 2024 RPAC Workshops; the two (2) votes in opposition were cast at the Antelope Valley RPAC. The concept has gained some traction with current use permit applications: one application removes existing STR rights from a multi-family complex currently renting long term in exchange for a single-family STR, and one proposes to build three new units in exchange for a single-family STR. One question that cannot be answered by policy or permit processing is whether these long-term rental projects would have materialized regardless of an STR permit.<sup>8</sup>

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<sup>7</sup> One STR for three housing units is an appropriate ratio. The STR Study found a new STR generates the need for 0.8 workforce housing units. Because the STR itself is no longer available to local residents, it is an impact of a second unit. The total direct impact, then, is about two units per STR. The third unit is the public benefit that provides an “incentive” for the County to approve a new STR permit. Hence, any ratio of less than one STR for three new units (1:3) does not provide a public benefit or incentive for the County to approve, and less than 1:2 does not mitigate direct impacts.

<sup>8</sup> A note of caution: The policy may be discussed, but specific projects should not be further discussed or evaluated as they are currently in process.

To understand better how short-term rentals may be leveraged as an incentive to create community housing, or to explore financial incentives which are outside of CDD's expertise, SMR Development was consulted through the County's housing program. SMR Development specializes in achievable housing development, including affordable housing, and urban renewal and redevelopment. SMR Development's professional opinion is provided in a memorandum (see Attachment E) and suggests that financial mechanisms are more likely to provide realistic outcomes, which is consistent with the Survey results. These incentives should be referred to the Housing Ad-Hoc Committee as they are outside the scope of these short-term rental regulations.

Regardless, a 3-for-1 incentive policy can still be adopted and made available for use by any interested applicant.

### Discussion

Policies establishing financial incentives to construct new housing are largely outside the scope of STR permit policies. The proposed Policy 1.D.9. provides support to continue developing incentives, and direction should be provided on any incentives of interest (see SMG Development's memorandum).

A policy could be added to favor a project that offers three housing units in exchange for a STR permit. Whether these three housing units directly result from the STR permit cannot be determined, but the bottom line is that a public benefit is generated. Variables that should be addressed in the policy include whether (a) the housing unit should be deed restricted for long-term rental or to a certain income limit, (b) the STR permit is guaranteed, (c) the cap can be exceeded, or (d) the STR permit can be granted outright or at the staff level. Such a policy would support the stated purpose of the policy set. No opposition or negative impacts have been identified, rather lack of interest and uncertainty of the effectiveness appear to be the main barriers.

### Policy Alternatives

- 4.L-1. Retain Policy 1.D.9. referencing the development and adoption of a future incentive program and provide direction on incentive programs of interest (see Attachment E). Unless directly related to the approval of STR permits, the programs should be referred to the Housing Ad-Hoc Committee for further discussion.
- 4.L-2. Add the following new policy with any desired modifications for the 3:1 incentive: *Policy 1.D.10. Favor a project proposal providing three housing units that are deed-restricted for long-term rental or ownership at less than 120% AMI (area median income) for every STR unit, provided the STR cap has not been met, development standards are satisfied, and the STR is otherwise deemed to be unlikely to cause public nuisance issues.*
  - Modifications to consider: (a) Remove or change the deed restriction requirements, (b) Require or guarantee approval of the STR permit, (c) Allow the

cap to be exceeded, or (d) Provide for a streamlined approval via outright or staff approval.

4.L-3. Adopt 4.L-1. and 4.L-2 with any desired modifications.

### Recommendation

4.L-3. Adopt both proposed policies. Modify the new policy as desired.

## 6.0. CONSOLIDATE ALL VISITOR RENTAL PERMITS UNDER ONE SYSTEM

### Background

According to the 2024 STR Study, Mono County is the only jurisdiction that differentiates permit types for different land use designations.<sup>9</sup> Presently, a given residential unit could be subject to two discretionary approvals, one discretionary approval, or no discretionary approvals at all, as follows:

<b>Table 4: STR Approvals Under Existing Regulations</b>		
<b>Land Use Designation</b>	<b>Required Discretionary Approval(s)</b>	<b>Required Ministerial Approvals</b>
Residential	(1) Use permit (2) short-term rental activity permit	(1) Business license, (2) transient occupancy tax certificate
Non-Residential	(1) Use permit	(1) Vacation home rental permit, (2) business license, (3) transient occupancy tax certificate
Commercial Lodging – Moderate and High only *	<i>None</i>	(1) Business license, (2) transient occupancy tax certificate
Certain condo complexes in June Lake	<i>None – under existing nonconforming uses</i>	(1) Business license, (2) transient occupancy tax certificate
* In developments where units are under individual ownership		

The Online Survey did not include a question about the permitting process; however, the 2024 RPAC outreach included options to (a) consolidate the permitting process into a single unified procedure with a single set of terms and requirements for all permits, regardless of land use designation, and (b) continue to require annual renewals for all STR permits. The response was an overwhelming 100% in favor (17 and 16, respectively) for both issues.

Applying an annual renewal indicates use of the two-step discretionary process requiring both a use permit approved by the Planning Commission and a Short-Term Rental activity permit (STR activity permit) approved by the Board of Supervisors. The Board directed the consolidation of the permitting process for all visitor rentals under this permitting system in February 2024.

The policy direction does not impact permitting in residential LUDs and is relatively easy to apply in non-residential LUDs, excluding MFR, by requiring a STR activity permit approval. The biggest change would be in CL-H, where one visitor rental under single ownership was permitted outright and would now be subject to the two-step discretionary approval process.

<sup>9</sup> Page 6, Mono County Short-Term Rental Housing Study (February 12, 2024)



The MFR LUD is the most complex. STRs are permitted subject to use permit in MFR-High (MFR-H) but prohibited in MFR-Low (MFR-L) and MFR-Moderate (MFR-M). However, several condominium complexes in June Lake were known to be visitor rentals for many years, or decades in some cases. These complexes were specifically named in the General Plan to be existing nonconforming uses for visitor rentals, which were then permitted outright. These visitor rentals transferred with the sale of the unit. The only other community with significant condominium complexes is Crowley Lake. However, at the Long Valley RPAC meeting, this policy appeared to be supported and most, if not all, condo complexes in Crowley Lake prohibit STRs through their covenants, conditions, and restrictions (CC&Rs). The remainder of this policy issue therefore focuses only on June Lake condominium complexes.

### Alternatives: Condominiums in June Lake

In April 2024, the Board of Supervisors adopted R24-038 which found that the existing nonconforming findings could no longer be made for condominiums because the continued conversion of multi-family residential units into visitor rentals is detrimental to public welfare.<sup>10</sup> As a result, STRs became subject to the permitted uses listed in the MFR LUD, which prohibits STRs in MFR-L and MFR-M, and requires a use permit in MFR-H. The June Lake real estate community and some condo unit owners have objected and requested reversion to the previous permitting system as an existing nonconforming use. Of particular concern is the Interlaken complex (38 units), which has been a visitor rental complex for decades but is in the MFR-M LUD where visitor rentals are prohibited. Other complexes to consider include the Edgewater Condos (MFR-H), Sierra Suns (MFR-H), Birch Creek (CL-M), Aspen Meadows (CL-H), and Hideaway Down Canyon (CL-H) (see Table 5). Currently, 60% of condo units are used as STRs in June Lake and condos comprise 56% (59 of 90) of all STRs in June Lake.

<b>Table 5: Affected Condo Complexes in June Lake</b>			
<b>Complex</b>	<b>Land Use Designation</b>	<b>Number of Units</b>	<b>Number (%) of Units Permitted</b>
Interlaken Condos	MFR-M	38	25 (66%)
Sierra Suns	MFR-H	12	8 (67%)
Edgewater Condos	MFR-H	20	14 (70%)
Hideaway Down Canyon	CL-H	10	5 (50%)
Aspen Meadows	CL-H	11	4 (36%)
Birch Creek Condos	CL-M	8	3 (38%)
<b>Total</b>		<b>99</b>	<b>59 (60%)</b>

In addition to the permitting process, the June Lake real estate community opposes the following two policies for condominium complexes: the two-year waiting period after a sale and prohibition of the transfer of STR rights to a new owner with the sale of a unit.

A few policy options are available for consideration:

<sup>10</sup> Resolution 24-038 (April 16, 2024)

**6.O-1. Adopt As Proposed:** A use permit and STR activity permit will be required for all visitor rentals in MFR-H. Visitor rentals will be prohibited in MFR-L and MFR-M, including the Interlaken complex. The waiting periods, cap, and prohibition of STR transfer apply in all cases. No changes to the proposed policies are required.

**6.O-2. Allow STRs at Interlaken:** An argument could be made that condominium complexes are more accessible as local housing due to typically lower sales prices, provision of common area services, and smaller units in general. However, Interlaken in particular is known to have high sales prices and a high percentage (66%) of STRs, and common area fees in condo complexes in general tend to be high due to age and maintenance costs in the harsh Eastern Sierra environment. As a result, an argument could also be made that Interlaken is not typically accessible to locals and therefore is not part of the community housing stock for long-term rentals and local ownership.

If allowing STRs in Interlaken is of interest, two main options exist: (1) The land use designation could be changed to MFR-H or CL through a General Plan Amendment (GPA), or (2) The MFR-M LUD could be amended to allow STRs through a GPA. Because both options require a GPA, which takes some time, visitor rentals could be permitted as existing nonconforming uses in the interim via one of the following options:

- a. To allow public comment and individual review, require the existing nonconforming findings for a proposed STR at Interlaken to be made at a public hearing before either the Planning Commission or Board. If desired, direction could be given that the cap and waiting periods must be satisfied in order to make the finding of no detrimental impact to public welfare.
- b. To allow STRs outright in Interlaken, as was the case prior to the most recent moratorium, adopt the existing nonconforming findings for Interlaken with the proposed policy set. If desired, the cap and/or waiting periods could be applied through the findings to meet these standards.

Once the GPA is completed, STRs in Interlaken would be subject to the same two-permit process as other STRs.

**6.O-3. Provide Carve-Outs:** Carve-outs could be applied to exclude specific LUDs (e.g., MFR-H, CL) or condo complexes from various regulations:

- a. Cap: State the LUDs or condo complexes excluded from the cap, or add additional units above the cap for only these LUDs or complexes.
- b. Waiting Period: State the LUDs or condo complexes excluded from the waiting period after a sale and/or after completion of construction of a new unit, or establish criteria to waive the waiting period, such as if documentation is provided that a unit was rented contiguously on a visitor basis for some period of time (e.g., 5 years, 10 years). As of July 2025, out of 107 visitor rentals, 73 have

been permitted for five or more years, and four have been permitted for ten or more years.

- c. Modify the permitting process for stated LUDs or condo complexes:
  - i. Allow STRs by right, no discretionary permits required – the cap and waiting periods would not apply.
  - ii. Require only a use permit – provides for public review and evaluation of land use conformance, waiting period could apply<sup>11</sup>, cap would not apply.
  - iii. Require only an STR activity permit – provides for public review, evaluation of land use conformance may be incomplete, waiting period could apply, cap could apply.
- d. Provide specific carve-outs for specific condo complexes based on certain criteria, such as sales price affordability, percentage of full-time residents, common area fee affordability, etc. The criteria of interest should be identified and staff directed to research this information, and a future agenda item can be brought back for further discussion.

**6.O-4. Do Not Apply Policy Changes:** Carve out the MFR and CL LUDs (and any others as desired) from waiting periods and the cap by making existing nonconforming findings to allow visitor rentals by right, as was the case before the moratorium.

## Discussion

Option 6.O-1. best supports the purpose of this policy package. However, to balance the policies with practical reality, historical uses, and supporting a crucial economic sector for June Lake, some concessions could be considered.

Under Option 6.O-2., the Interlaken complex is, anecdotally, likely not accessible as community housing for local residents and workers, and therefore completely prohibiting STRs under the MFR-M LUD potentially impacts the visitor economy without gaining significant housing benefits. Changing the land use designation to MFR-H or CL and allowing case-by-case review of STR proposals in the interim would align it with other similar condo complexes.

For the most part, the carve-outs under 6.Q-3. do not support the stated purpose of the policy package. However, an argument could be made that “historic” STRs that have not contributed to community housing stock for five or 10 years have limited housing benefits. The waiting period could be waived for these long-standing STRs with potentially relatively little impact to the housing situation while supporting the tourist economy. Under Option 6.Q-3.d., if the necessary research were completed on individual condo complexes, potentially a few complexes could be identified as not impacting the community housing stock and therefore carve-outs could be acceptable.

Option 6.Q-4. is detrimental to the purpose of this policy package.

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<sup>11</sup> The waiting period requirement would need to be transferred from Mono County Code to the General Plan.

## Recommendation

1. Adopt the policies as proposed; and
2. If desired, direct staff to initiate a GPA to change the land use designation of Interlaken to MFR-H or CL and, in the interim, direct the Planning Commission to hear any new STR proposals in Interlaken at a noticed public hearing to make the findings for an existing nonconforming use subject to the cap and waiting periods.

## ATTACHMENTS

- A. Summary of Online Survey results: presentation to the Board of Supervisors on February 20, 2024
- B. Mono County Short-Term Rental Housing Study
- C. Summary of 2024 STR Housing Study and policy options: presentation to the Board of Supervisors on February 20, 2024
- D. Mammoth Lakes Board of Realtors comment letters and response from the Mono County Community Development Department
- E. Memorandum from SMR Development regarding leveraging STR permits to incentivize development of housing units

# County Survey

*Aaron Washco,  
Planning Analyst – Mono County*

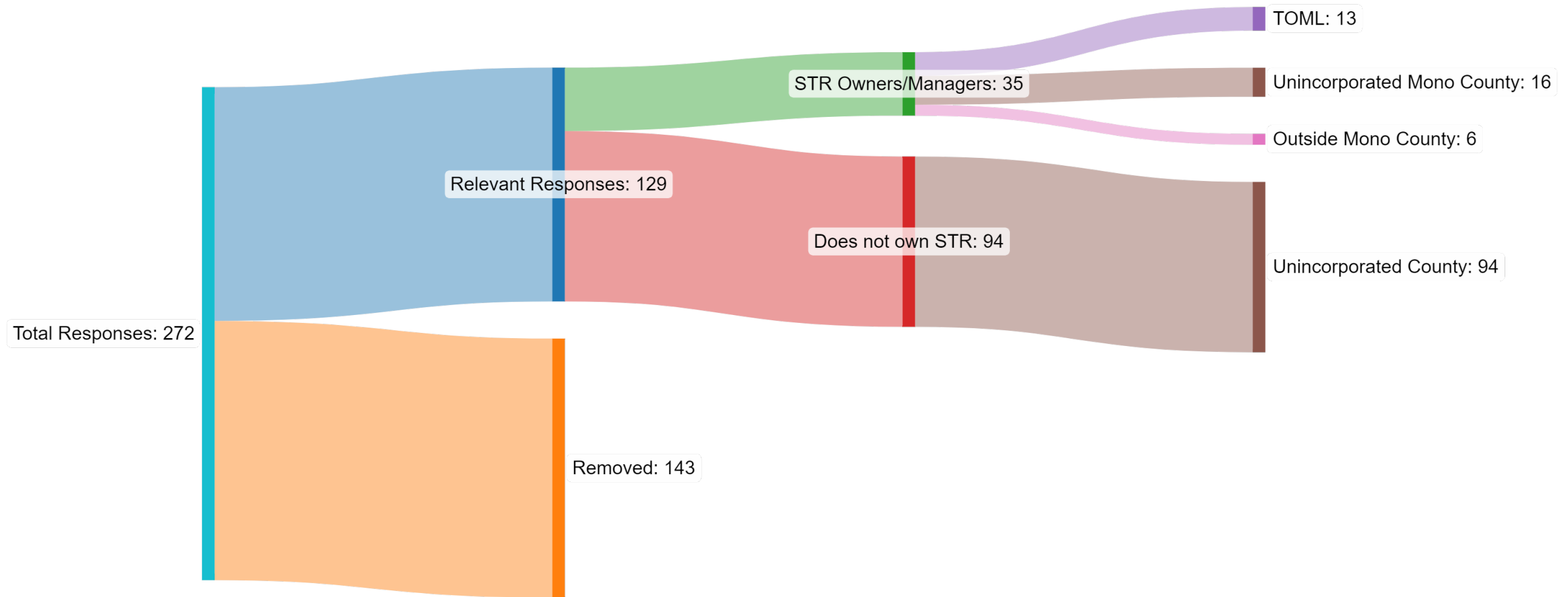


# The Data Set

- 272 total responses
- The following groups of responses were removed from the data set:
  - Live in TOML/own STR in TOML
  - Live in Mono County/own STR is TOML
  - Lives in TOML/doesn't own any STRs
  - Lives outside county/owns STR in TOML
  - Didn't say where they live/doesn't own any STRs
  - Didn't say where they live/owns STR in TOML
- 129 responses remain in the data set, from the following groups:
  - Lives in TOML/owns STR in unincorporated county
  - Lives in unincorporated county/owns STR in unincorporated county
  - Lives in unincorporated county/does not own any STRs in unincorporated county
  - Lives outside county/owns STR in unincorporated county
  - Didn't say where they live/owns STR in unincorporated county

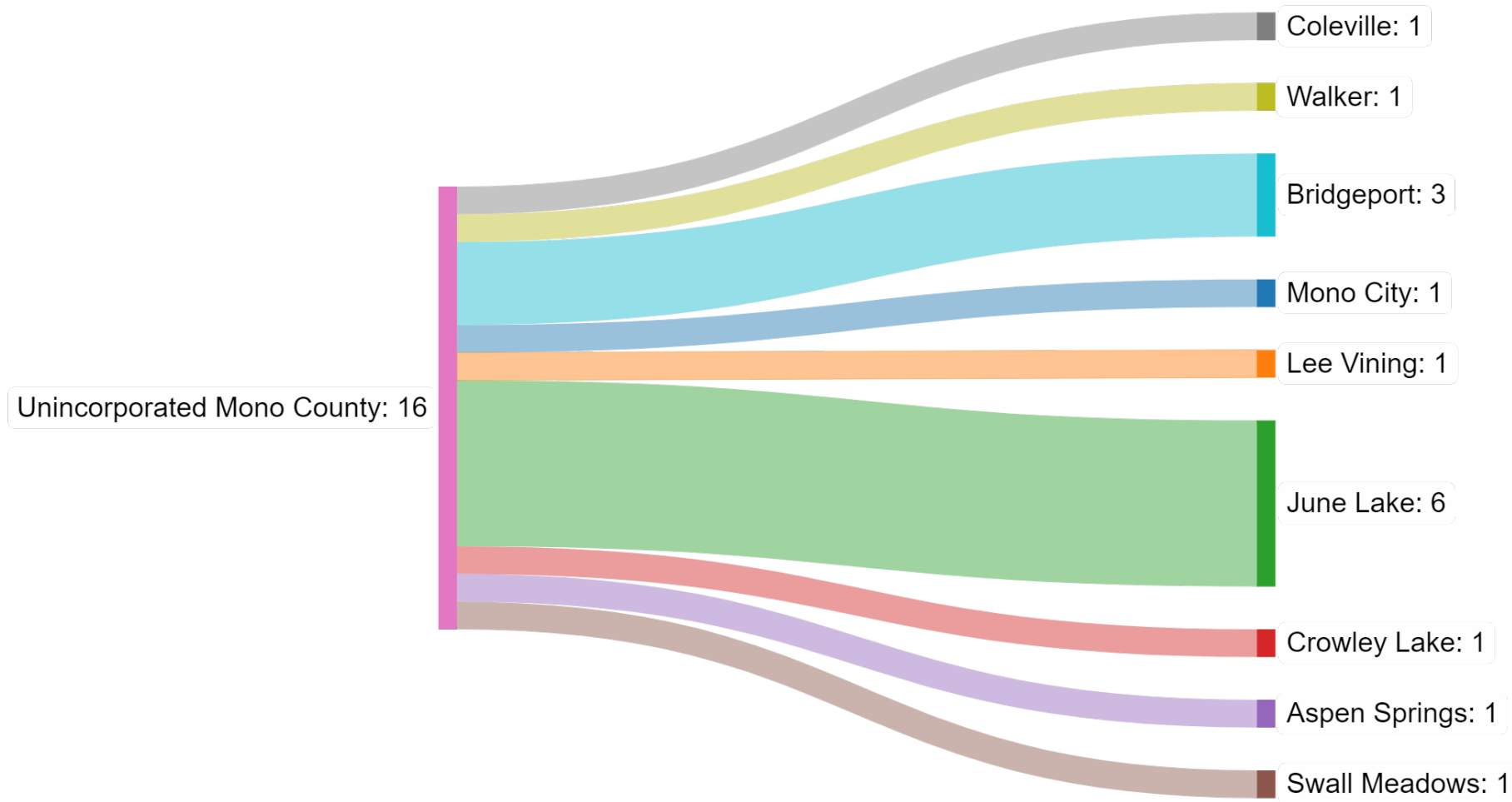
# The Data Set

41



# The Data Set – STR Owners/Managers

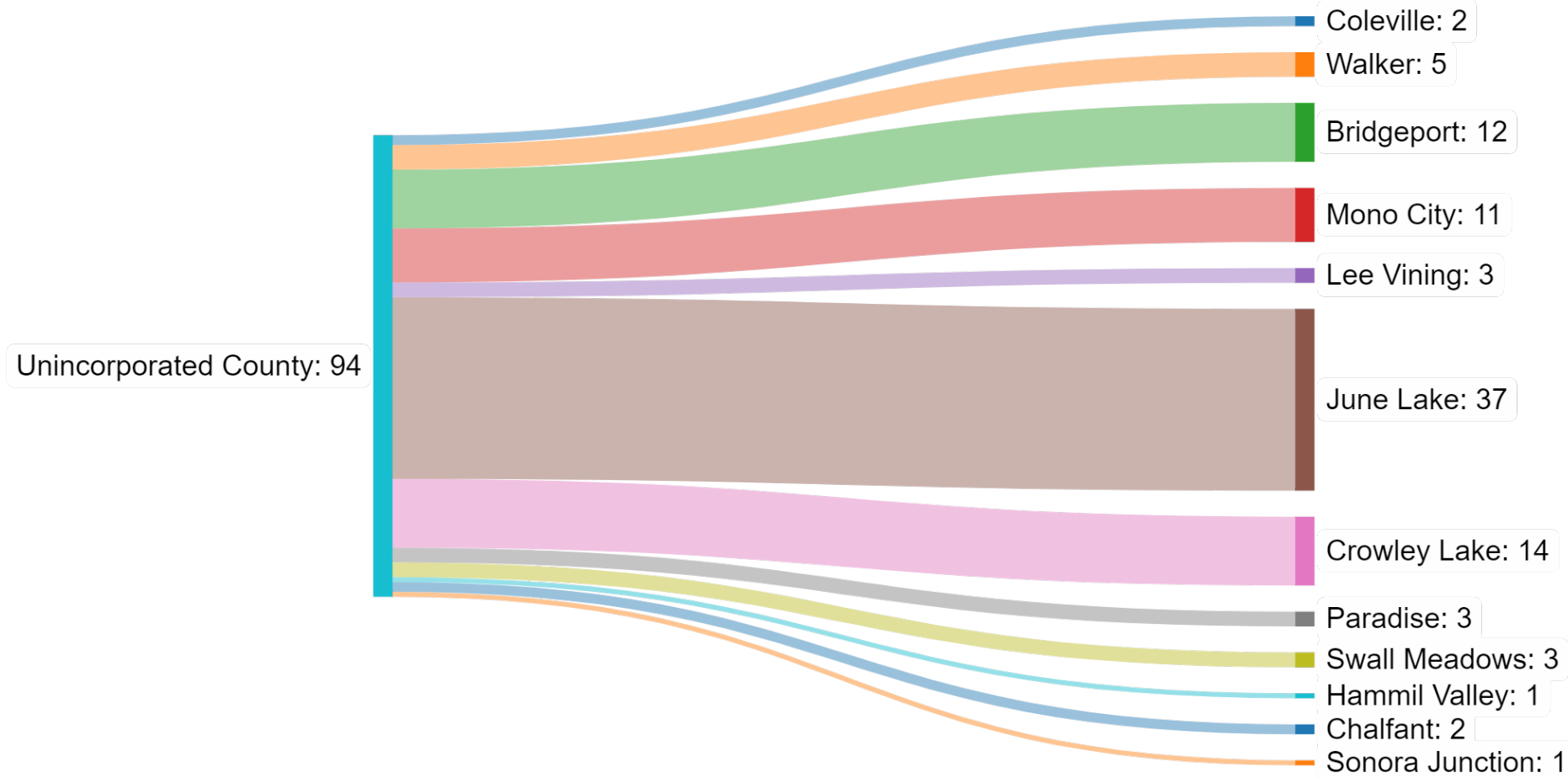
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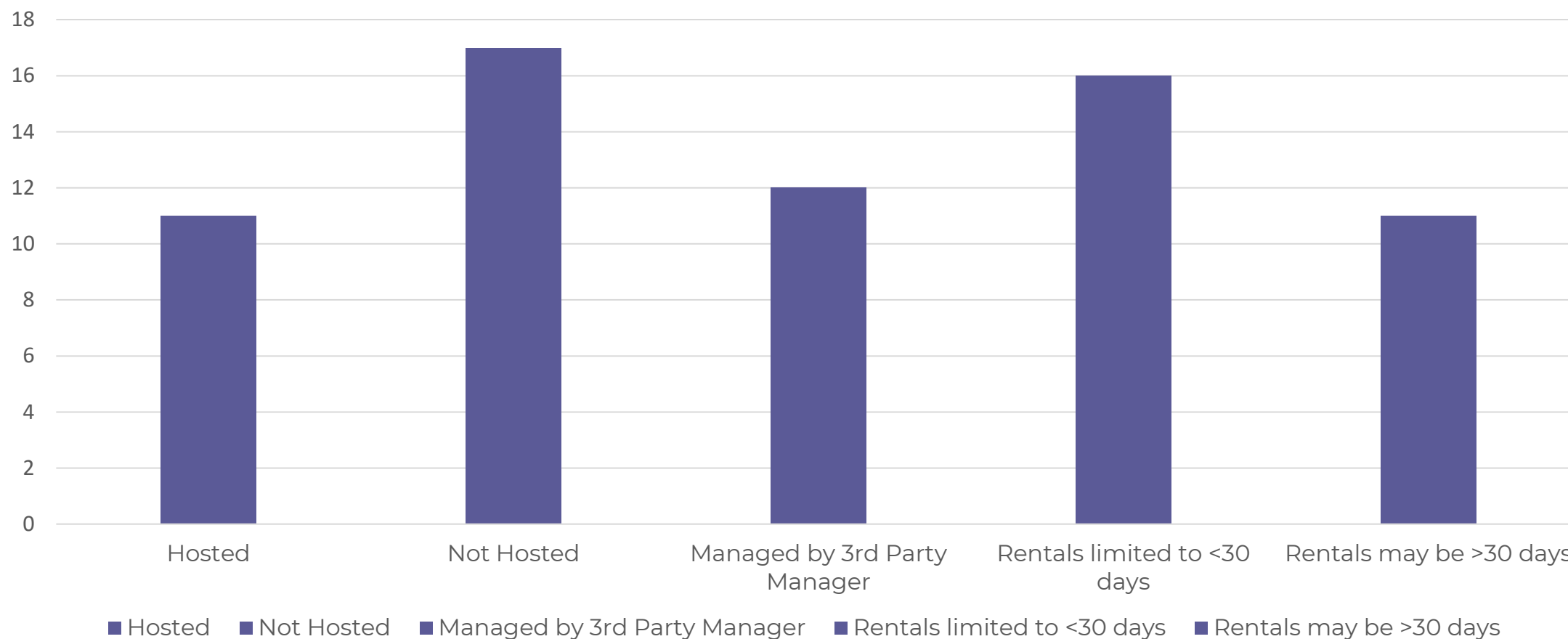


# The Data Set- Does Not Own or Manage STR

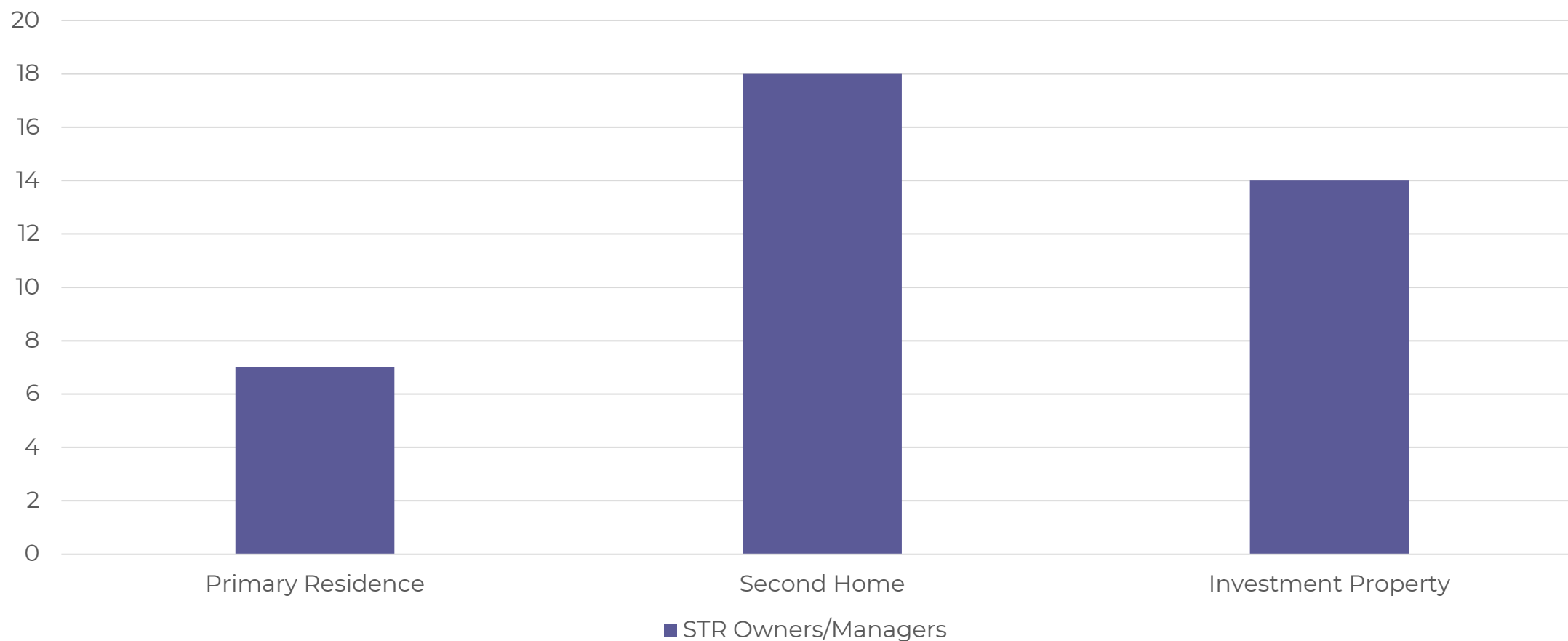
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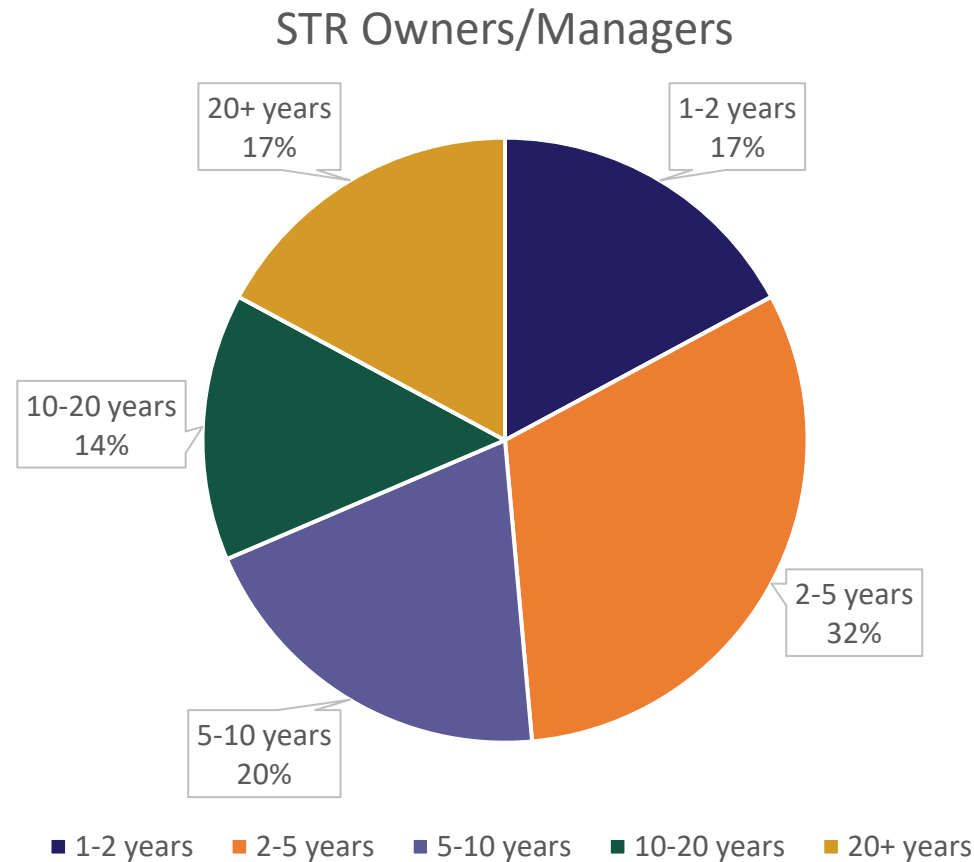
# What best describes your STR or TOT licensed property? (select all that apply)



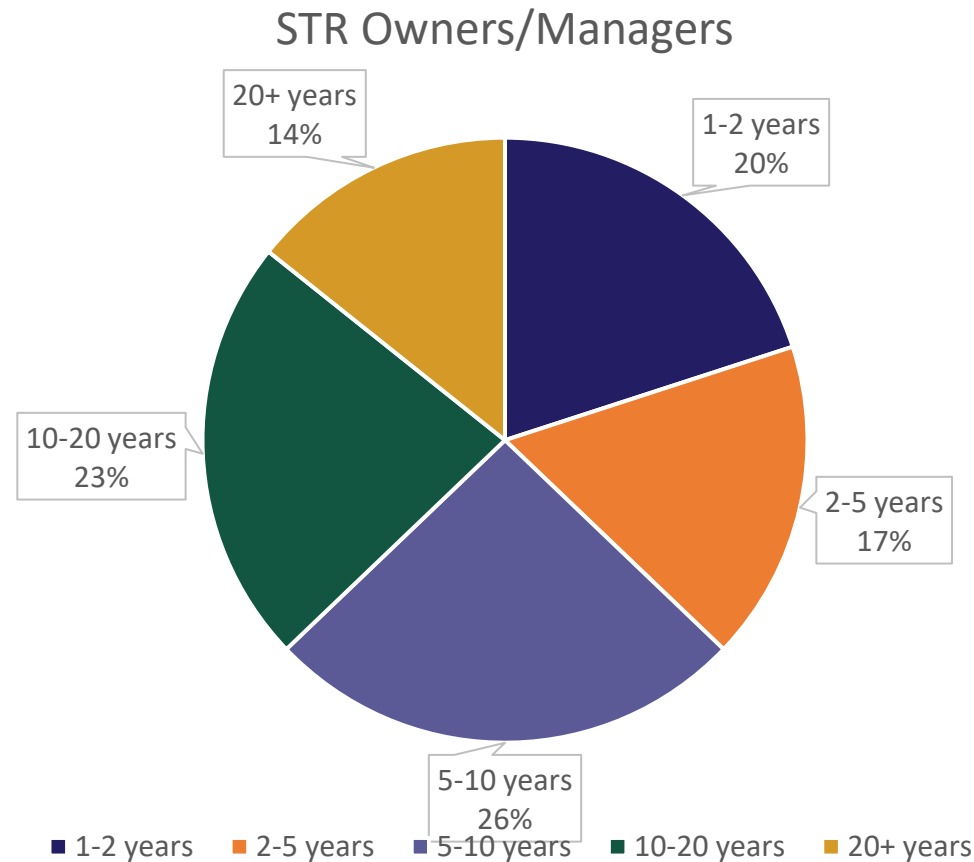
# How else is your STR or TOT licensed property used? (select all that apply)



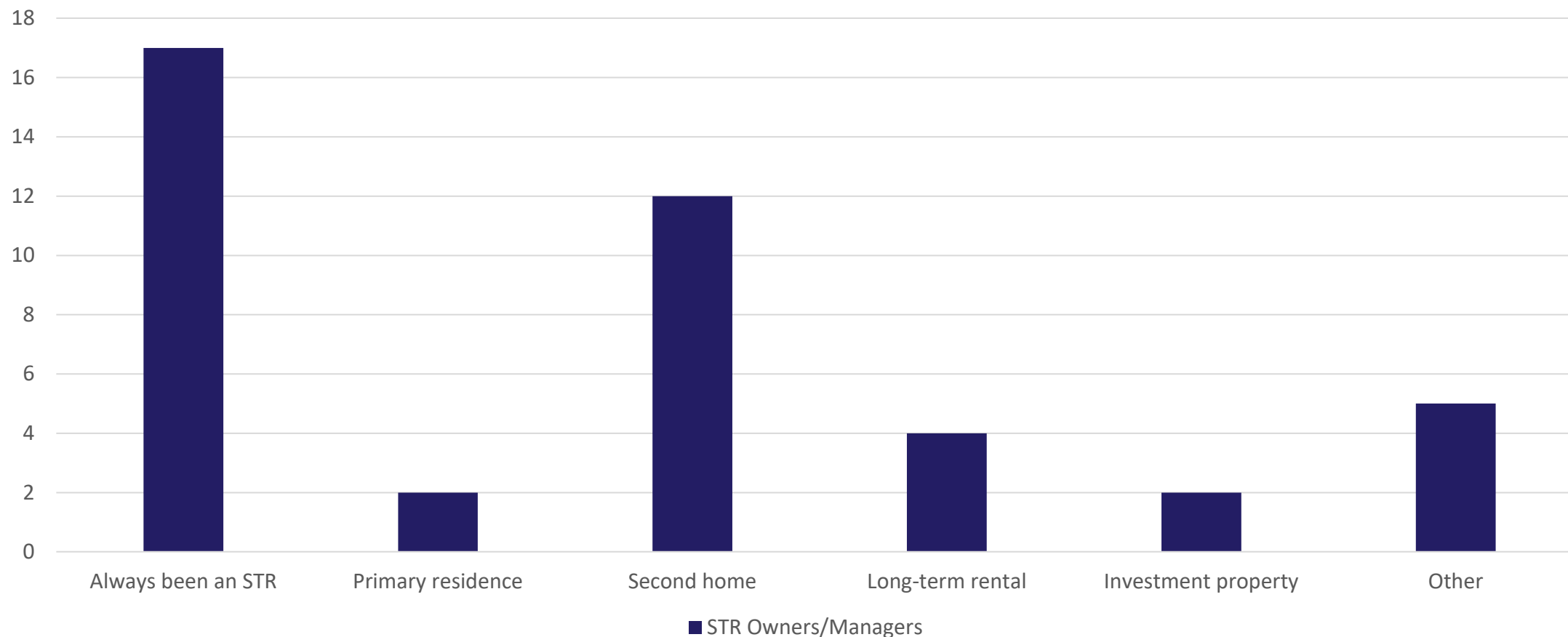
# On average, how long has your STR been under current ownership?



# On average, how long have the properties been operating as tourist accommodations?

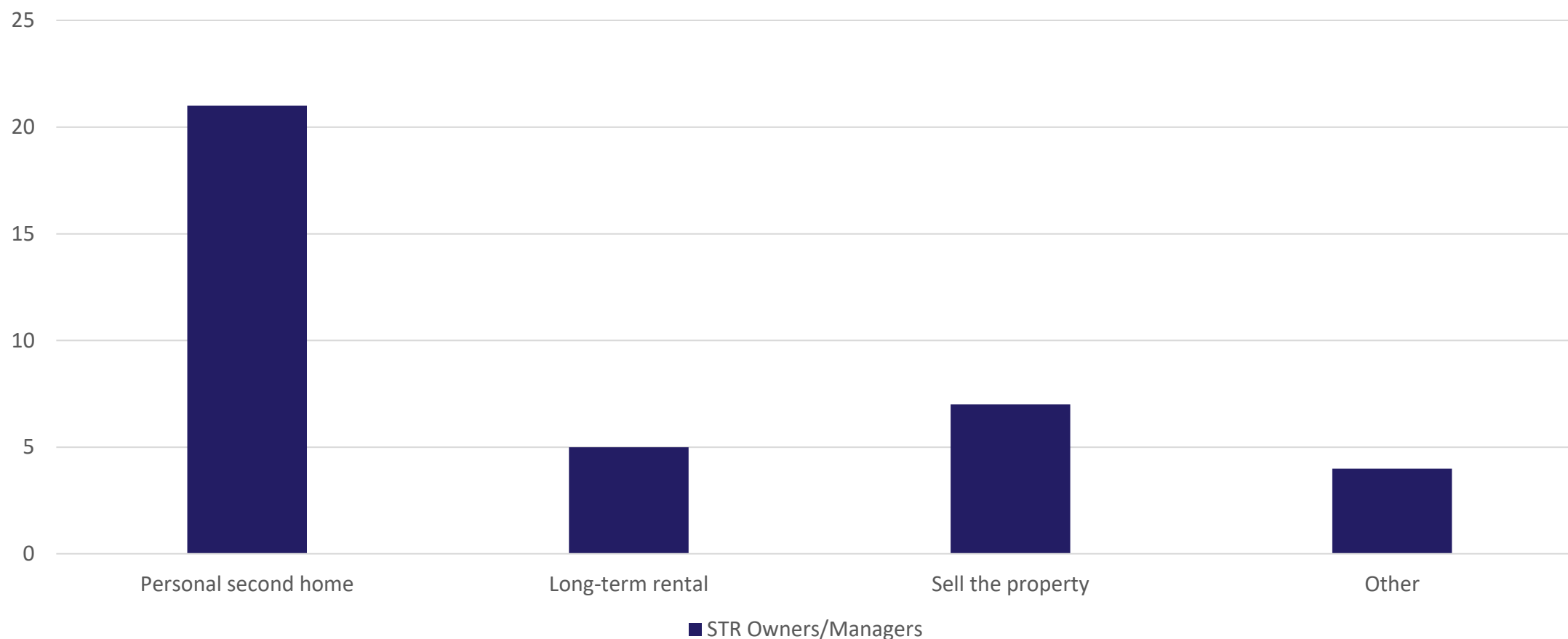


# How was the property utilized prior to being rented as an STR or TOT licensed property?



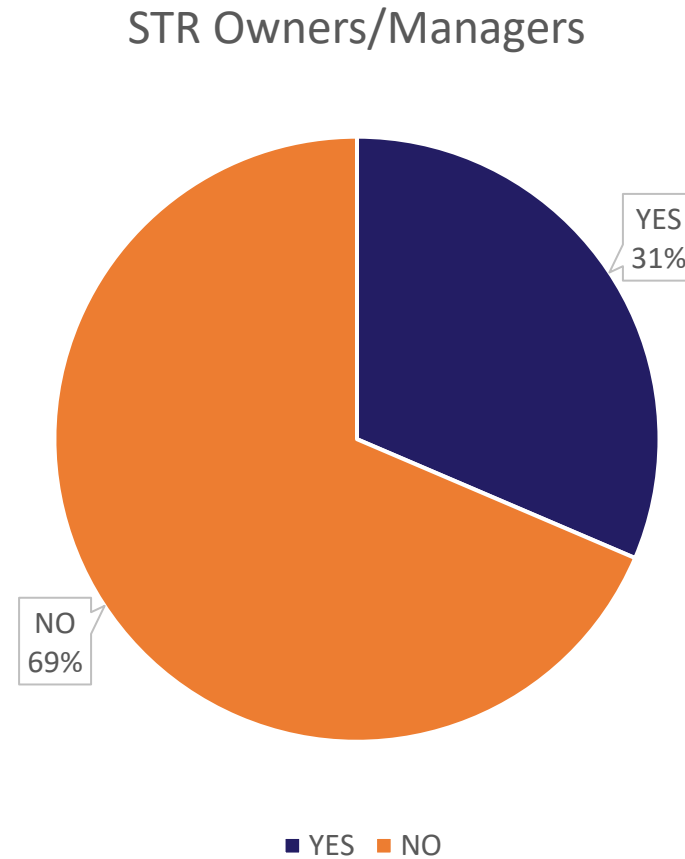


# If the property couldn't be used as an STR, what would be a viable alternative?

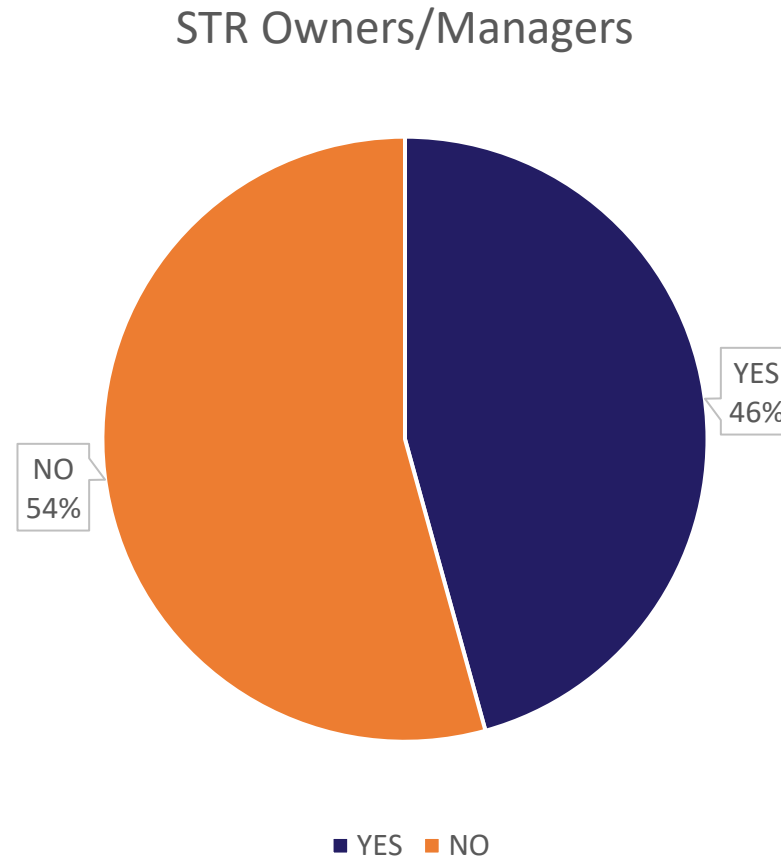




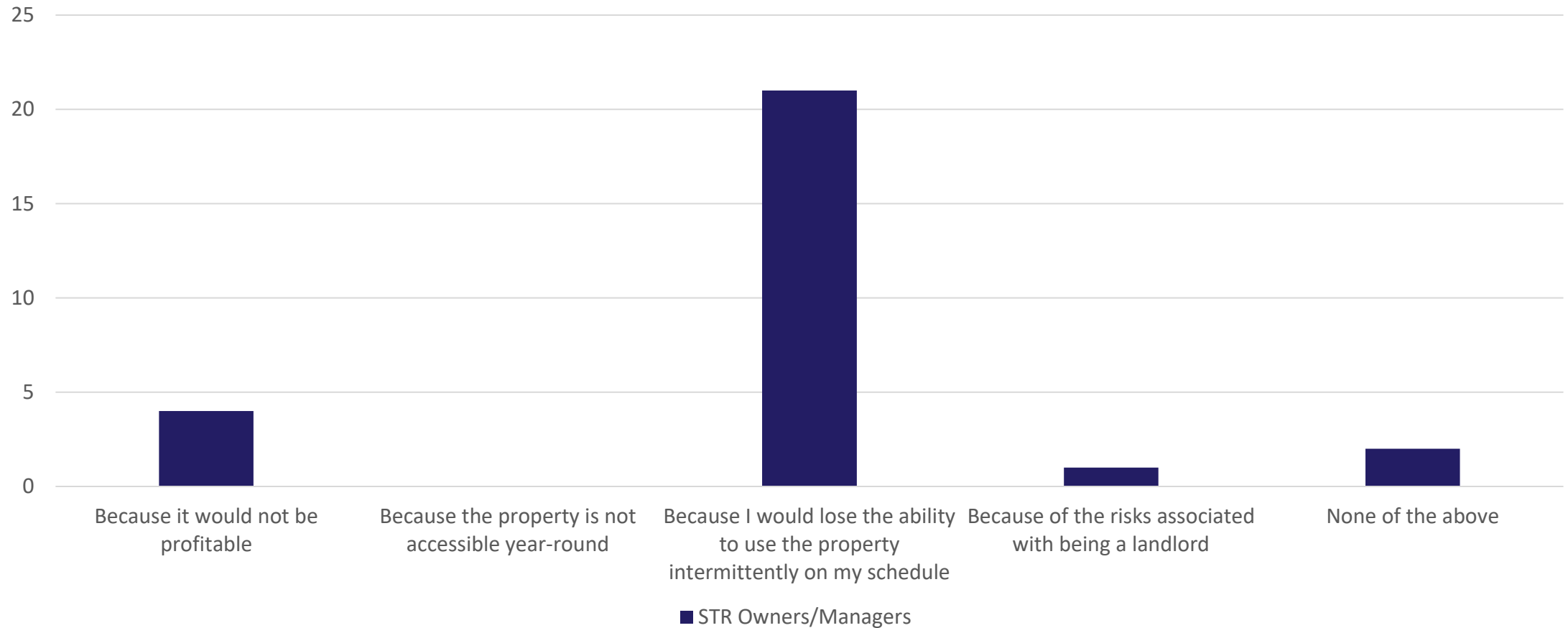
# Have you ever rented the property long term?



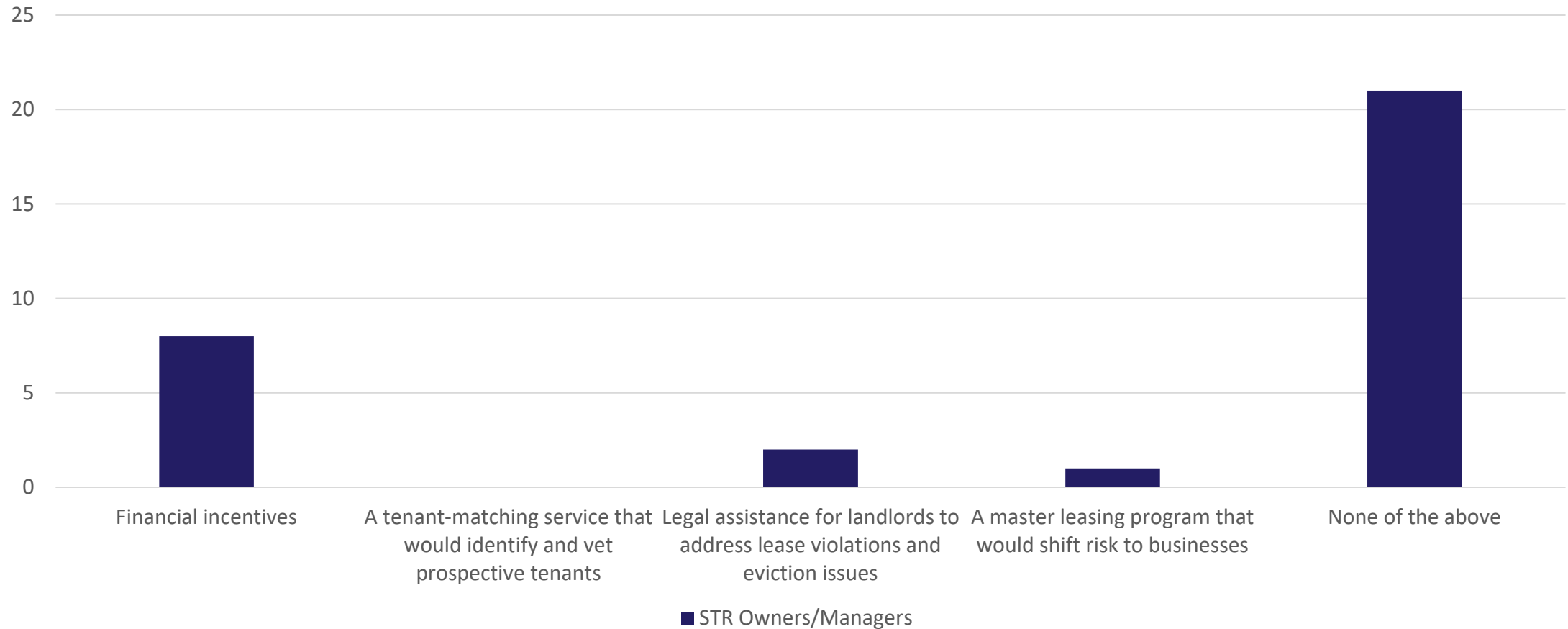
Do you own or manage any other properties, separate from your STR(s), that are rented on a long-term basis?



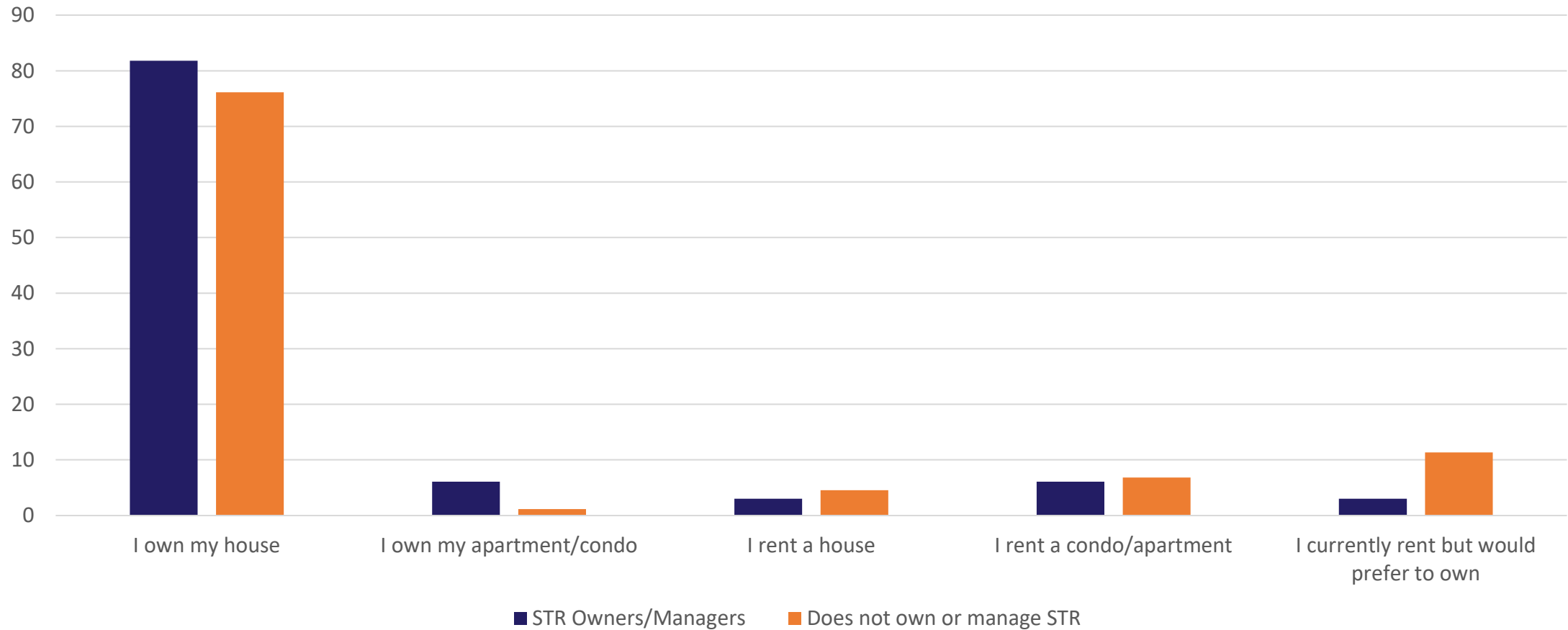
# Why do you rent your property short term instead of to long-term tenants?



# What incentives, if any, could entice you to rent your property long term?



# How would you describe your personal housing situation?



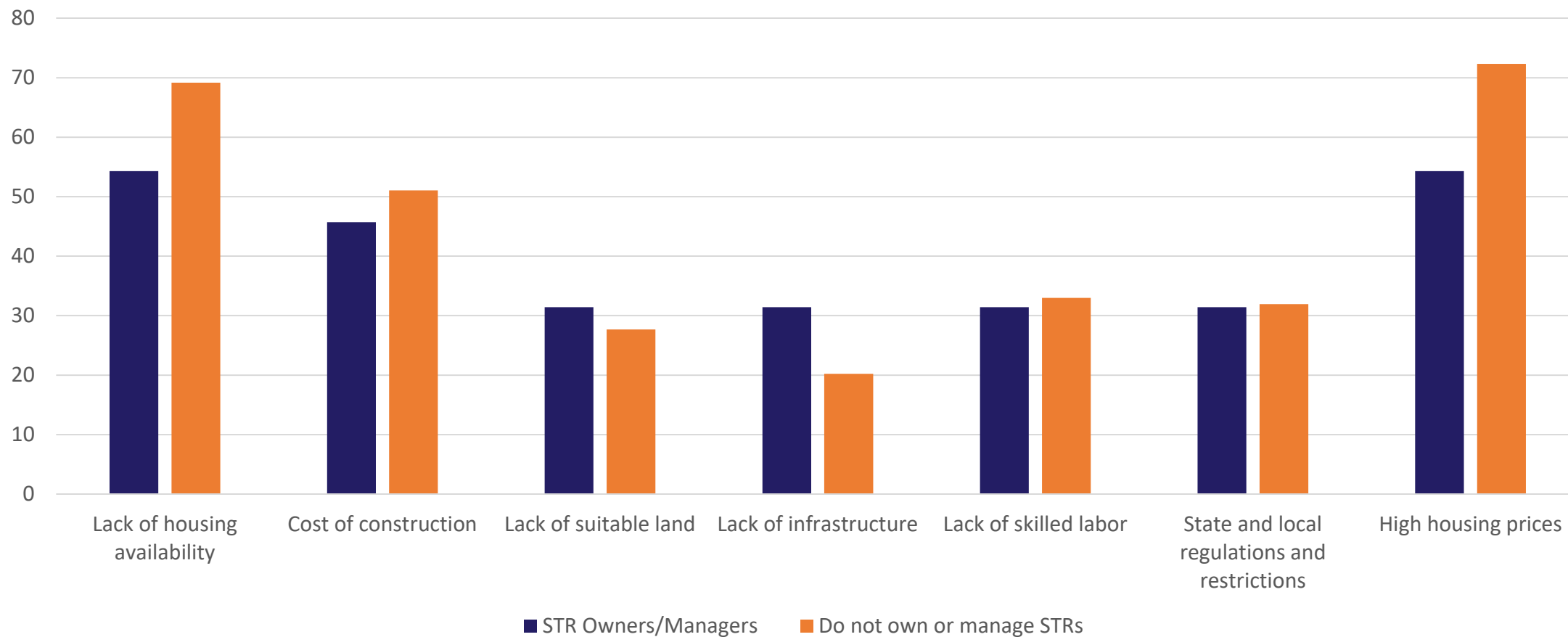
# How would you describe your individual annual gross income?



# How much do you pay from your gross income on housing?



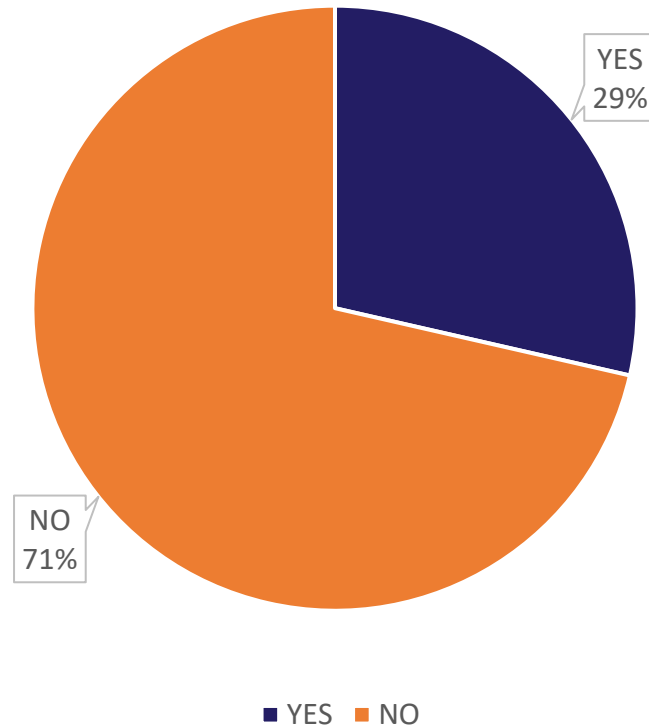
# What do you see as Mono County's main community housing challenges? (select all that apply)



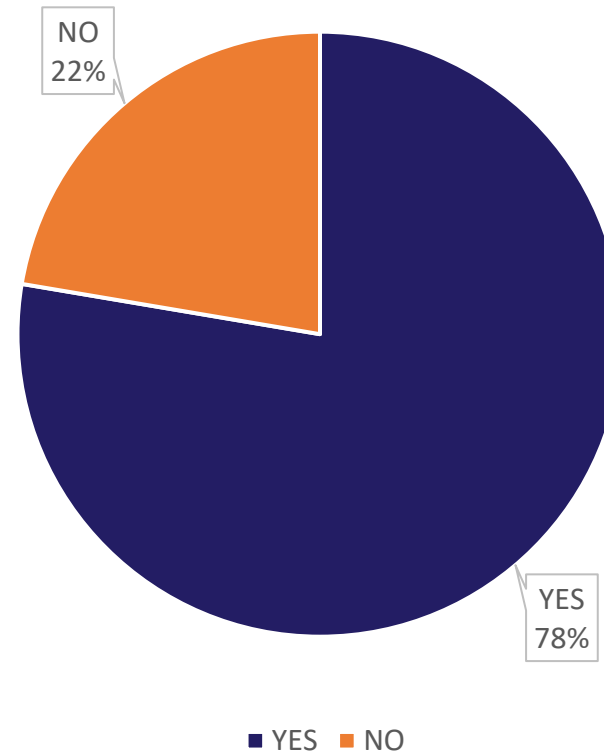


# Do you believe that STRs impact housing availability and affordability?

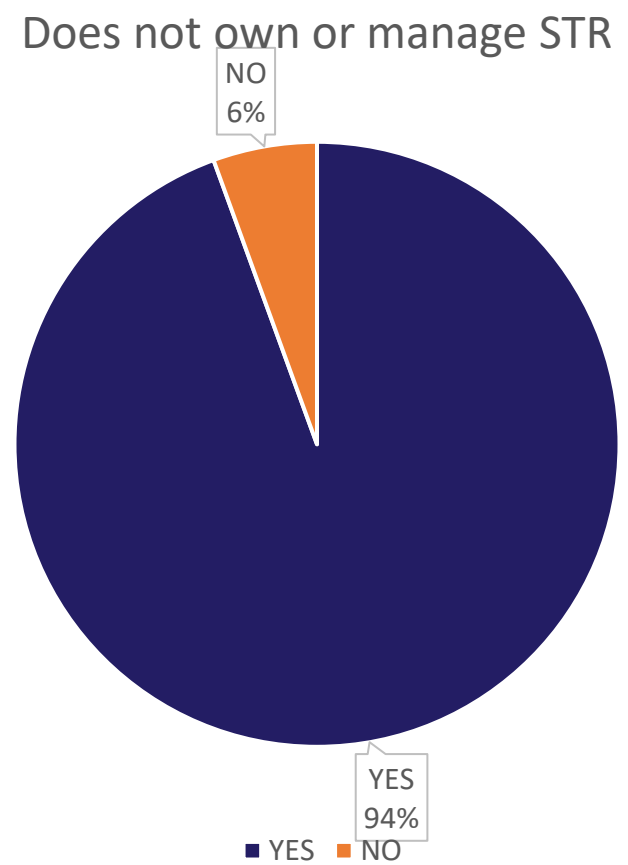
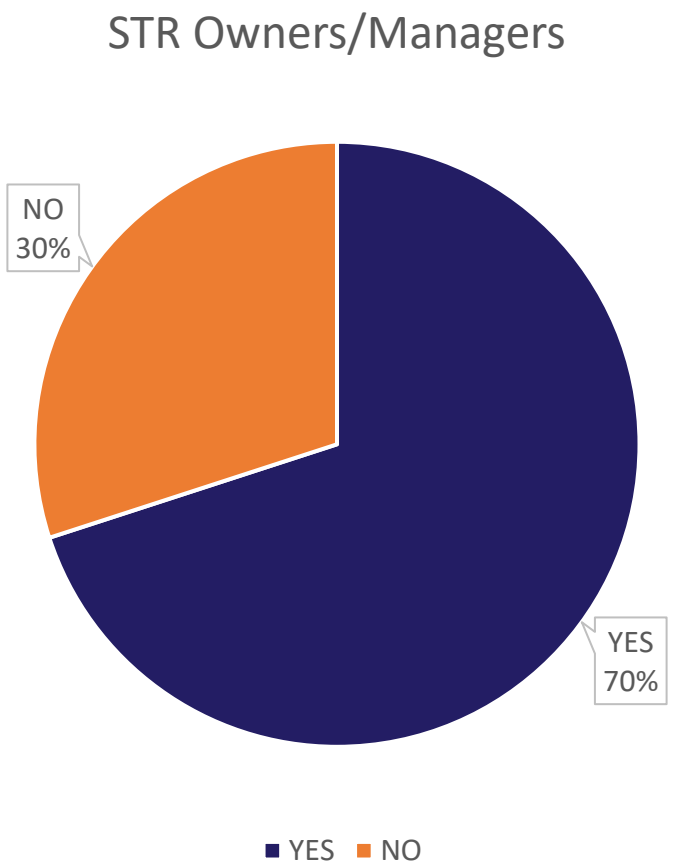
STR Owners/Managers



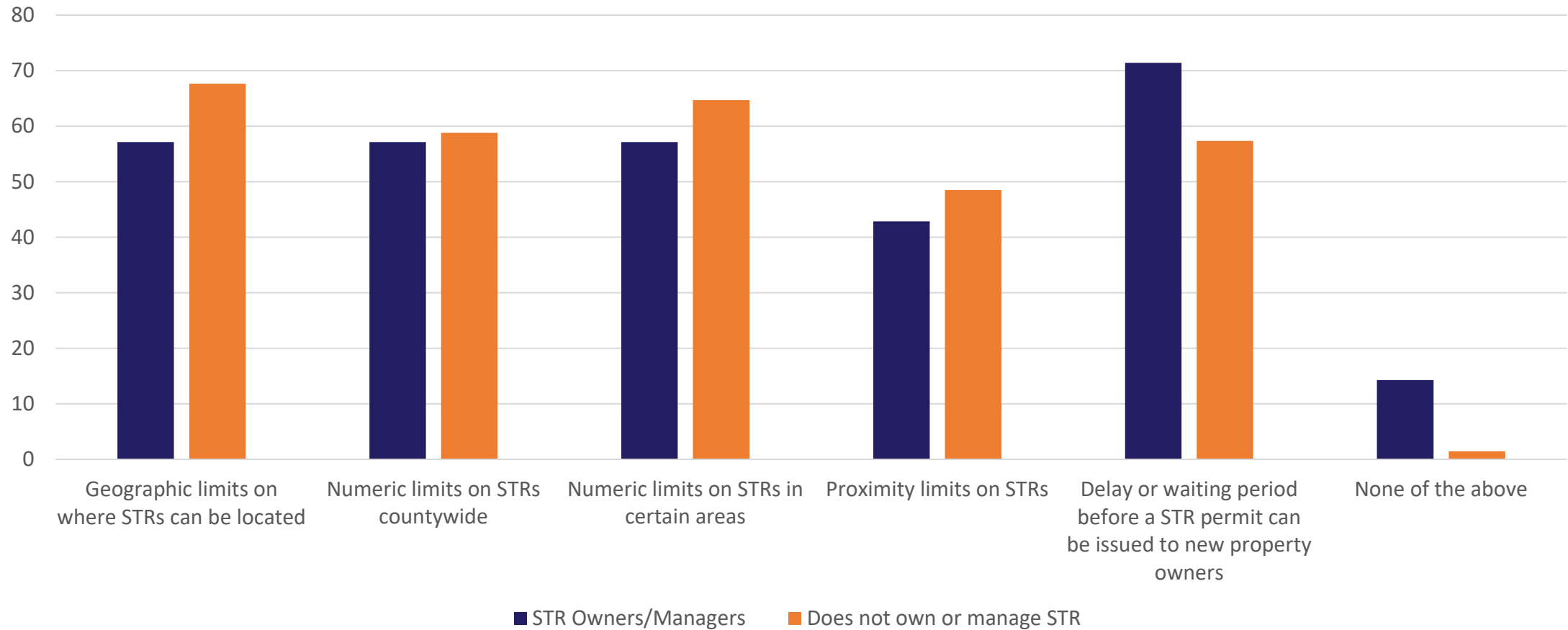
Does not own or manage STR



If you answered yes to the last question, would you support additional regulation or mitigations of STRs that offset potential impacts?

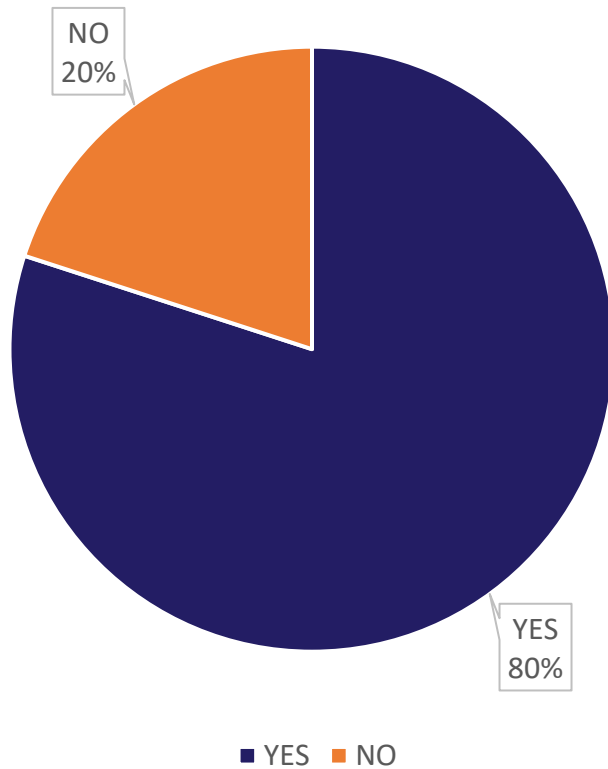


If you answered yes to the previous question, what types of regulations or mitigations might you support?

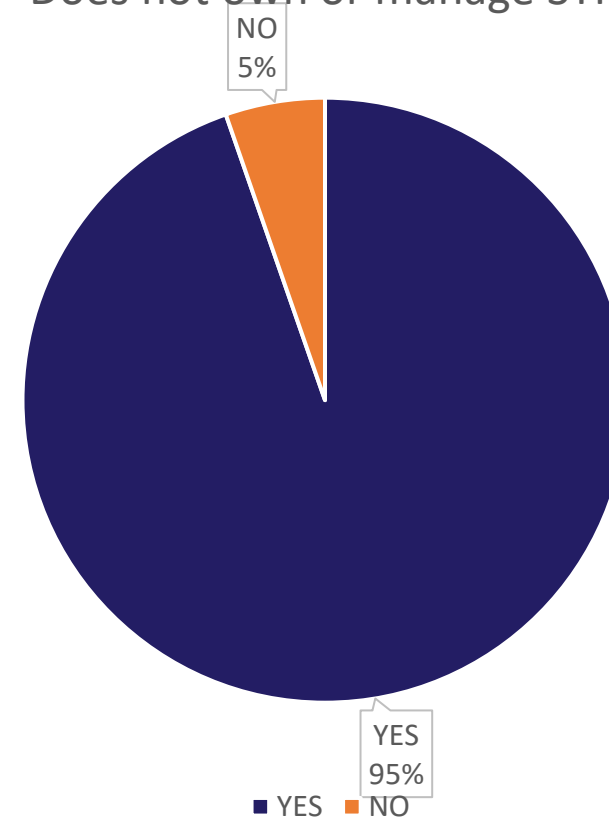


# Would you support programs or incentives that support the creation or preservation of housing for local workforce?

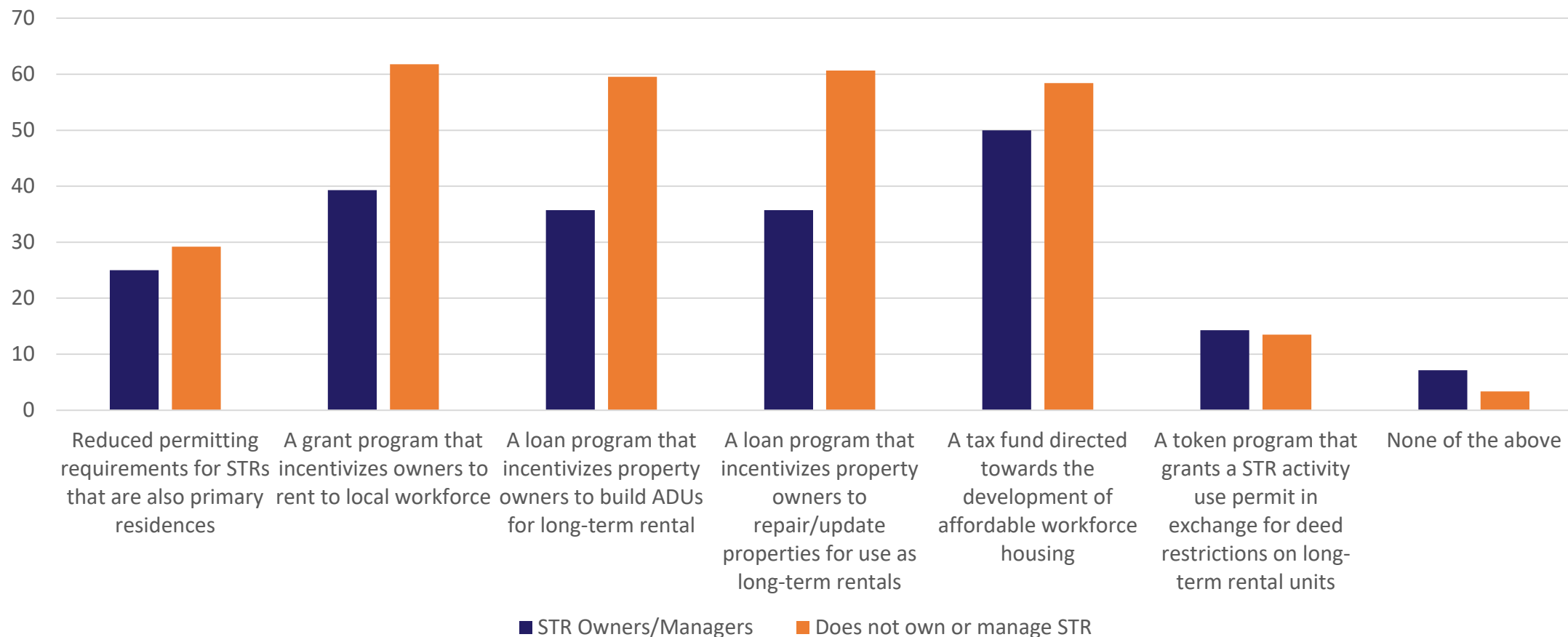
STR Owners/Managers



Does not own or manage STR

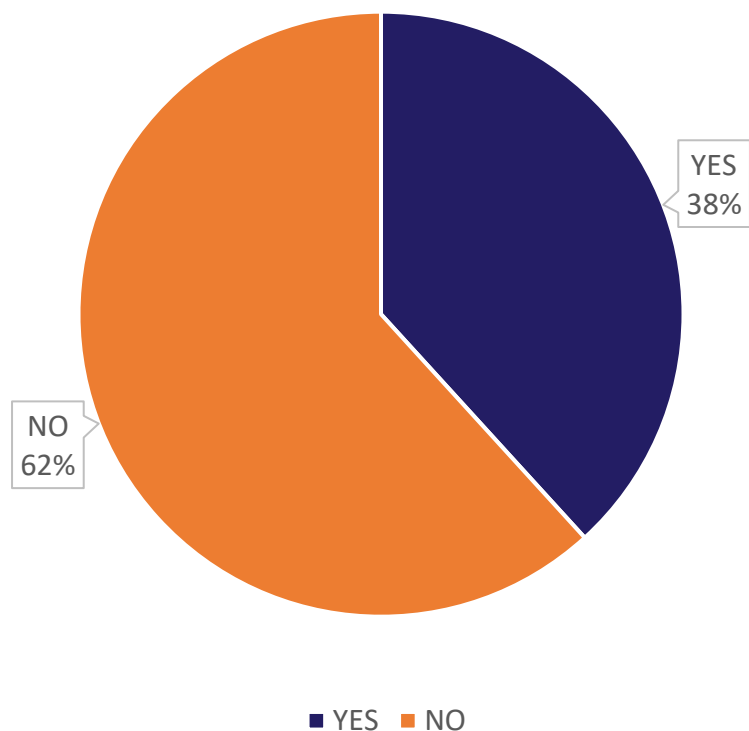


# If you answered yes to the previous question, what programs or incentives might you support?

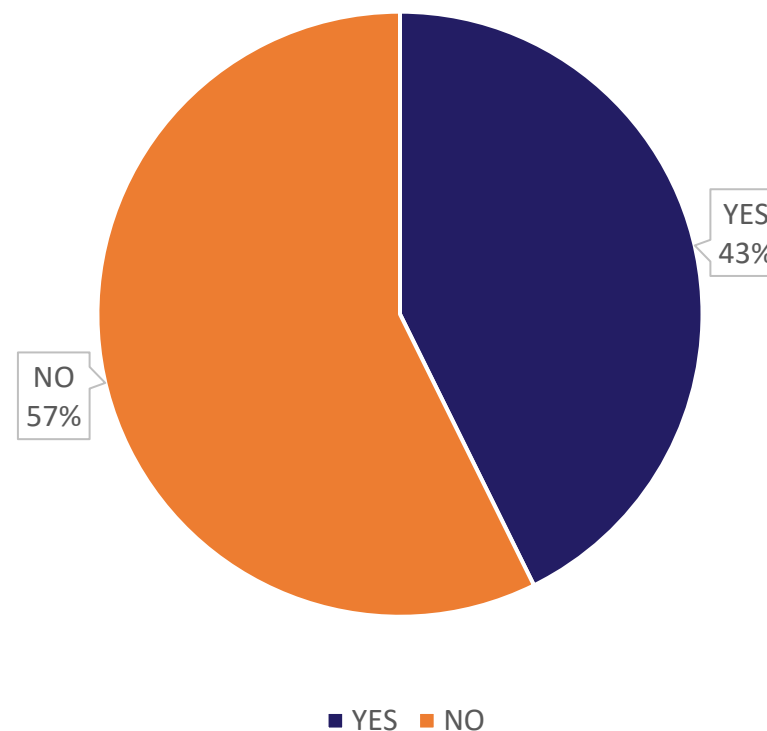


# Have you had problems or challenges finding, securing, or maintaining adequate affordable housing?

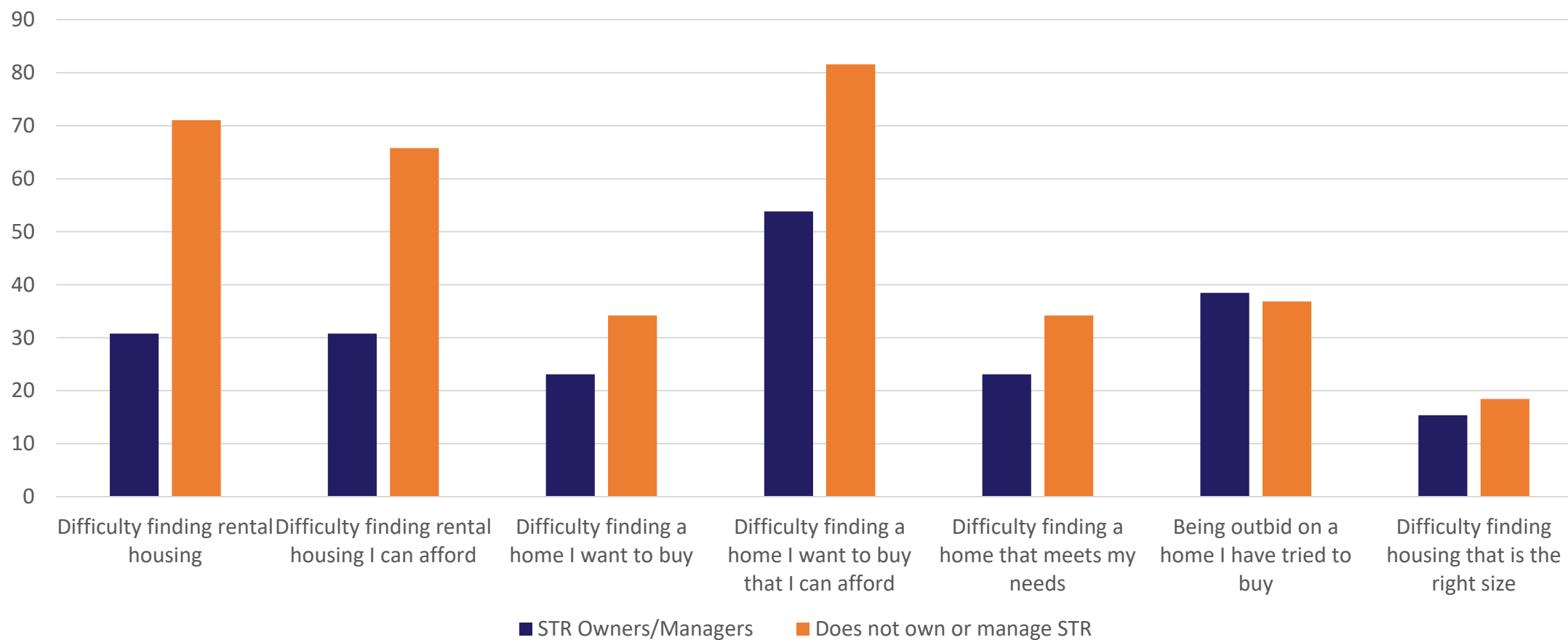
STR Owners/Managers



Does not own or manage STR

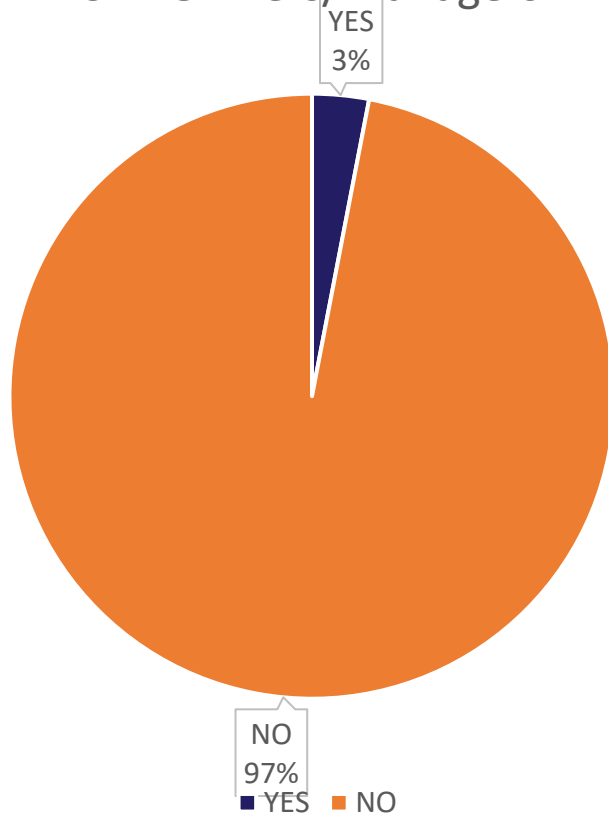


If you answered yes to the previous question, what types of challenges have you faced? (select all that apply)

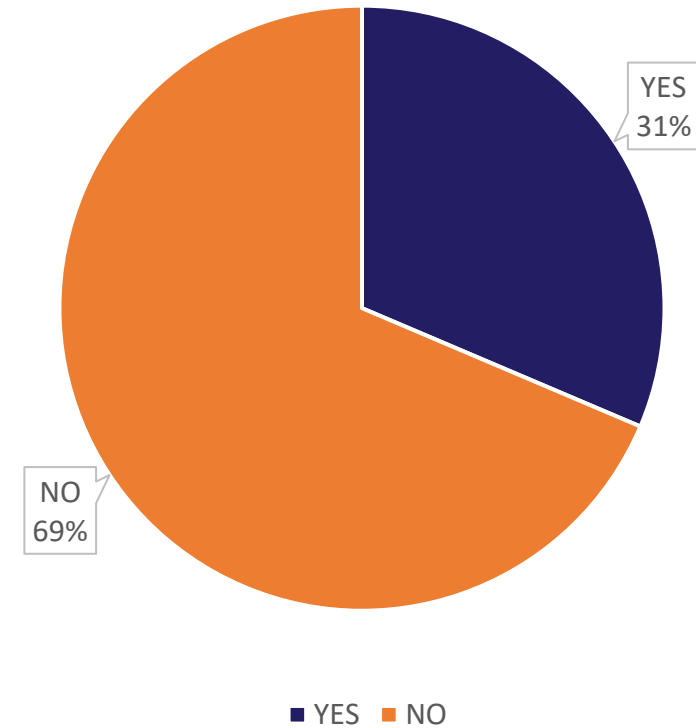


# Was your housing situation impacted at some point because of an STR?

STR Owners/Managers



Does not own or manage STR







# Mono County

## Short-Term Rental Housing Study

February 12, 2024

Prepared for the County by:



# CONTENTS

<b>EXECUTIVE SUMMARY .....</b>	<b>4</b>
Background .....	4
Literature Review Summary .....	5
Policy Analysis Summary.....	6
Economic Analysis Summary.....	8
Stakeholder Engagment Summary .....	12
Conclusions and Options Summary.....	13
<b>PART 1 BACKGROUND .....</b>	<b>17</b>
Context – Mono County .....	18
STR Regulation History .....	18
<b>PART 2 LITERATURE REVIEW .....</b>	<b>20</b>
Housing Availability and Affordability .....	20
Lodging Industry Occupancy and Rates.....	25
<b>PART 3 POLICY ANALYSIS .....</b>	<b>26</b>
Mono County.....	26
Policy Comparison .....	32
<b>PART 4 ECONOMIC ANALYSIS .....</b>	<b>40</b>
Housing Market Conditions and Trends.....	40
Tourism Accomodation Industry and Trends.....	60
Induced Workforce Housing Demand .....	70
<b>PART 5 STAKEHOLDER ENGAGEMENT .....</b>	<b>72</b>
<b>PART 6 CONCLUSIONS AND OPTIONS.....</b>	<b>76</b>
<b>BIBLIOGRAPHY.....</b>	<b>81</b>

## LIST OF FIGURES

Figure 1. STR Regulation History.....	19
Figure 2. Housing Stock Utilization, 2023 est. ....	41
Figure 3: Seasonal Vacancy Heat Map with STRs/Motels, 2020 Decennial Census.....	43
Figure 4: Average Annual Single-Family Home Sales Volumes by Planning Area, 2019 Through November 2023.....	46
Figure 5: Median Per Square Foot Single-Family Sale Price by Planning Area, January to November 2023 .....	47
Figure 6: Housing Problems by Income and Tenure, Mono County, 2016-2020.....	53
Figure 7: U.S. Postal Service Change of Address Requests for ZIP Codes 93514, 93517, 93529, and 96107 .....	55
Figure 8: K-12 School Enrollment, Eastern Sierra Unified School District, 2016-17 to 2022- 23.....	56
Figure 9: In- and Out-Commuter Rates, Mono County, 2016-2020 ACS.....	57
Figure 10: Employment and Unemployment Trends, Mono County, Jan 2015 through Oct 2023 .....	58
Figure 11: Employment & Unemployment Trends, Town of Mammoth Lakes, '15-'23.....	59
Figure 12: Leisure & Hospitality Jobs as Share of Total Nonfarm Employment, '00-'22 ..	60
Figure 13: Tourist Accommodation Units by Type, Town of Mammoth Lakes and Unincorporated Mono County, December 2023.....	61
Figure 14. 12-Month Average Hotel Occupancy Rate, Unincorporated Mono County.....	62
Figure 15. 12-Month Average Hotel ADR and RevPAR, Unincorporated Mono County.....	63
Figure 16. Average Number of Online Listings, Unincorporated Mono County '20-'21.....	65
Figure 17. Annual Availability, Unincorporated Mono County, '22 – '23.....	66
Figure 18. Average Occupancy Rate, Unincorporated Area, November 2023 .....	67
Figure 19. Average STR ADR and RevPAR, Unincorporated Mono County, Nov. 2023.....	67
Figure 20. Gross Annual Revenue, Unincorporated Mono County, '22 – '23.....	68
Figure 21. Listing Type, November 2023.....	69
Figure 22. Online Rental Unit Size, November 2023.....	69

## LIST OF TABLES

Table 1: Summary of Literature Review Findings of the Impacts of STRs on Rental and For-Sale Home Pricing .....	22
Table 2: Summary of Literature Review Findings of the Impacts of STRs on Induced Workforce Housing Demand and Reduced Long-Term Housing Supply .....	24
Table 4: Permit Requirements, by Land Use Area .....	30
Table 5. Owner-Occupied/ Non-Owner Occupied STRs Allowed, By Area .....	30
Table 6. Policy Rationale, by Jurisdiction .....	33
Table 7. STR Requirements, by Jurisdiction .....	38
Table 8. Housing Occupancy and Vacancy Status, 2010 and 2020 .....	42
Table 9. Home Sales Characteristics by Unit Type, Unincorporated Mono County, 2019 Through November 2023 .....	45
Table 10. Condominium Sales Trends by Planning Area, 2019 to November 2023 .....	48
Table 11. Affordable For-Sale Housing Prices, Mono County, 2023 (Page 1 of 2) .....	49
Table 12. Long-Term Rental Listings, Unincorporated Mono County, December 2023 .....	51
Table 13. Affordable Long-Term Rental Rates, Mono County, 2023 .....	52
Table 14. Housing Problems by Income and Tenure, Mono County, 2016-2020 .....	54
Table 15. Hotel/Motel Properties and Number of Rooms/Units, Unincorporated Mono County, December 2023 .....	62
Table 16. Permitted Short-Term Rentals with Transient Occupancy Tax (TOT) Certificates, Unincorporated Mono County, December 2023 .....	64
Table 17. Online Short-Term Rental Listings from AirDNA, Unincorporated Mono County, December 2023 .....	65
Table 18. Workforce Housing Demand Induced by New STRs, Unincorporated Mono County, December 2022-November 2023 .....	71

# EXECUTIVE SUMMARY

## BACKGROUND

Mono County adopted a moratorium temporarily prohibiting new short-term rentals (STRs) of single-family residences in May 2022. The moratorium responded to concerns that the ability to rent residential units for transient lodging of 30 days or less created a shortage of housing for the local workforce.

Mono County began regulating short-term rentals in 2012 in recognition of the need to create diverse accommodation options, while minimizing their impact to residential neighborhoods. Initially, the County focused its regulations on mitigating nuisances and health and safety issues and required a General Plan Amendment (GPA) to allow transient lodging use. Over time, the County refined its regulations based on community input and Board of Supervisors policy direction. Most recently, the County adopted its current (pre-moratorium) regulations in 2018, which required both a STR activity permit and a Use Permit for short-term rentals in residential land uses.

The purpose of this Short-Term Rental Study is to examine if and what correlations exist between allowing residential property owners to rent their houses for 30 days or less and the availability and/or affordability of rental and/or for-sale housing. The study is organized into six parts:

- **Part 1: Background:** Provides background on Mono County's history regulating STRs and frames the purpose of this Study.
- **Part 2: Literature Review:** Summarizes research and analysis conducted for over 50 academic articles and industry publications related to how STRs are regulated. This analysis can help inform best practices that Mono County can consider.
- **Part 3: Policy Analysis:** Identifies policy options regarding how the County can better regulate short-term rentals to meet both community and County goals.
- **Part 4: Economic Analysis:** Summarizes information and data related to Mono County housing market conditions and trends, tourism accommodation industry trends, and induced Workforce Housing Demand.
- **Part 5: Stakeholder Engagement:** Summarizes community ideas and feedback obtained during a series of stakeholder discussions.
- **Part 6: Conclusions and Options:** Identifies potential policy objectives related to STR regulations and housing, and options to achieve those objectives.

## LITERATURE REVIEW SUMMARY

The project team (MIG and BAE) peer reviewed more than 50 academic articles and industry publications (literature) about short-term rentals and workforce housing as part of this Study. Seven publications addressed non-urban locations with similarities to Mono County. The remaining literature was mainly focused on impacts within major urban tourist markets, such as Barcelona, London, Los Angeles, New York City, and San Francisco, among other locations. The urban-focused STR studies contain quantitative documentation of the relationships between STRs and conditions in the long-term housing market and are included to better understand ongoing trends in unincorporated Mono County. The following themes emerged based on the literature review.

---

### STRS AND THE HOUSING MARKET

The literature suggests that STRs impact the availability and cost of long-term housing, but the degree to which this is true varies based on the case study and method of analysis. According to the literature, STRs can increase the cost of for-sale housing by offering a revenue stream as a form of investment, which has been referred to as the “hotelization” of the housing stock. The available professional literature agrees that STRs do have an impact on local housing markets and, typically, the greater the concentration of STRs, the greater the impact. Research indicates that effects of STRs are stronger in areas with less owner-occupied housing and smaller inventories of hotel and motel accommodations. However, research conducted in markets where STRs account for a relatively small share of the total housing stock (e.g., San Luis Obispo County) determined that in those cases STRs do not represent enough of a demand driver to justify further regulation.

---

### STRS AND THE TOURISM ACCOMODATION INDUSTRY

There is a consensus in the research that STRs likely have an impact on occupancy and pricing among hotel and motel properties within the same market. The impacts appear larger regarding pricing compared to occupancy, where the impacts are greater on lower-priced, urban hotels rather than higher-end and suburban markets. The impacts are primarily due to a variable increase in the competitive supply of tourist accommodation. Some literature also notes that a larger competitive supply of STR units can create a disincentive to invest in hotel development and renovation. Because STR supply is ‘instantaneous,’ it can readily supplement hotel inventory during peak periods, reducing the need to make significant investments in new hotel inventory that may go underutilized during much of the year.

## POLICY ANALYSIS SUMMARY

To understand the regulatory approach of similar jurisdictions and how the county compares, this study analyzed 19 jurisdictions that have similarities to Mono County in terms of physical attributes, geography, and/or economic drivers. Three jurisdictions, Eagle County, CO; Gunnison County, CO; and Blaine County, ID, have no current STR regulations at the time of publication. For a glossary of terms, see the definition section of the Policy Analysis on page 29. The following section outlines the key takeaways from the policy analysis work.

### Average Regulation:

- Nearly all jurisdictions require some type of permit or license for STR activity.
- Nine out of 16 jurisdictions identify workforce housing as a policy rationale for regulating STRs.
- Most jurisdictions regulate STRs differently based on land use designations, with residential land uses generally having stricter regulations than non-residential land uses.
- Most jurisdictions did not require a waiting period to apply for an STR permit after the purchase of a home.

### Stricter/Unique Regulation:

- Mono County is one of only a few jurisdictions studied that link housing mitigation fees to STR activity.
- Mono County has among the strictest permit requirements for STRs in residential land uses, including the number of permits needed and the discretionary process required.
- Mono County is the only jurisdiction that differentiates permit types for different land use designations (e.g., STR Permit for residential and Vacation Home Rental (VHR) Permit for non-residential).
- Four jurisdictions have put a cap on the number of permits, either jurisdiction-wide or based on specific land use zones. Mono County has a cap in one area of June Lake.
- Some jurisdictions, such as Mammoth Lakes and Routt County/Steamboat Springs, CO, regulate where STRs are allowed or not allowed outright, based on their land use designation. Mono County does the same in some areas such as Mono City, Swall Meadows, and parts of June Lake.
- Four jurisdictions implemented some version of a Zoning Overlay; where three jurisdictions proactively created these zones, Mono County required a discretionary process to create its Transient Rental Overlay Districts (TRODs), although Mono County amended its code later to discontinue overlay districts.

- Truckee will prohibit new permits for Accessory Dwelling Units (ADUs) and multi-family units (MFU). Mono County also restricts STRs in ADUs but has less strict regulations for STRs in individually owned MFUs in non-residential land use designations.
- Only seven jurisdictions differentiate between “hosted” or “occupied” rentals, and Mono County has some of the strictest regulations on non-hosted rentals in certain locations.



## ECONOMIC ANALYSIS SUMMARY

### HOUSING MARKET CONDITIONS AND TRENDS

Mono County contains approximately 4,286 housing units in the unincorporated area, which is 31 percent of the 13,912 total countywide housing units. Approximately 60 percent, or 2,540 housing units, are occupied full-time in unincorporated Mono County, based on a combination of California Department of Finance information and the 2020 Decennial Census. Of the full-time occupied units, about one-third (821) were rented and two-thirds (1,719) were owner-occupied.

#### VACANCY RATES

More than 80 percent of the vacant housing stock, or about 40 percent of total units in the unincorporated county, are considered 'second homes' because they are used for seasonal or occasional use. About 117 units are considered functionally vacant, which means they are available for sale or rent. Other vacancies may include homes that are undergoing renovations or in the process of being sold.

The data shows a shift toward seasonal vacancy over the last 10 years. The total number of vacant units available for rent or for sale decreased, as well as the number of rented, not-occupied units, but the number of seasonally vacant units rose by about 10 percent from 2010 to 2020.

#### HOUSING SALE PRICES AND RENTAL RATES

Around 90 percent of all home sales in unincorporated Mono County over the study period were single-family homes. The median single-family home sale price over this period increased by 56 percent, from \$349,000 in 2019 to almost \$580,000 in 2023. Over this period, the median unit size for single-family home sales remained stable, suggesting that the observed increase in price is a function of market demand and unit quality, versus differences in unit size. The per square foot sale price for single-family homes also increased by around 46 percent from \$233 per square foot in 2019 to \$342 per square foot in 2023.

The remaining eight percent (5 units) of homes sold were condominiums. The average sale price for a condominium was \$626,800, compared to an average sale price of \$562,191 for a single-family residence. Location may account for this difference in price. The five condominium sales occurred in the June Lake, unincorporated Mammoth Lakes, and Long Valley areas, which typically have a higher price per square foot than more rural parts of the county. However, the County's current regulatory structure pertaining to STRs may also be a contributing factor.

Based on Mono County's median income of \$76,650 for a two-person household and December 2023 rental listing prices, the average long-term rental in unincorporated Mono County could be considered affordable to low and moderate-income households, depending upon household size. In unincorporated Mono County, a two-bedroom unit for a two-person moderate-income household is about \$2,088 per month. According to long-term rental listings in December 2023, the average price for a two-bedroom unit in the unincorporated County was about \$2,183. A one-bedroom unit would be considered affordable at about \$1,196 for a two-person household with a low income.

The average price for a one-bedroom unit was about \$1,123. However, while housing may be affordable from a statewide perspective, this data does not speak to its relative availability for the local workforce.

The data shows that the housing market is not adequately serving all households within the Mono County community. For example, the number of rentals is constrained even though rents are relatively affordable. As a result, rentals generally go to households with comparatively higher incomes, and very-low and extremely-low households likely struggle to secure adequate housing. Data also reflects a greater prevalence of overcrowding in Mono County compared to other California jurisdictions.

### *NEAR-TERM MIGRATION TRENDS*

Unincorporated Mono County experienced a modest outflow of 41 permanent relocations in 2019 and 25 relocations in 2020, which increased to 265 permanent relocations in 2021 and 203 in 2022. While not conclusive, this data supports anecdotal evidence of significant out-migration among permanent residents, potentially resulting from decreased housing affordability and availability, among other factors. Similar trends are evident in Mammoth Lakes, which experienced increasing permanent outmigration from 2019 through 2022.

### *LABOR FORCE TRENDS*

Due to its comparatively remote location, communities in Mono County must predominantly rely on the resident labor force to meet workforce needs, versus relying on workers commuting into the community from outside. Data from the 2020 five-year American Community Survey (ACS), the most recent data available, indicate that there were 8,162 persons on average employed in Mono County, with 87 percent also living within the county, and only 13 percent commuting into the county from outside. In-commuters primarily originate from the neighboring areas of Inyo County in California and Douglas County in Nevada. By comparison, Mono County had an average of 8,095 employed residents, with approximately 88 percent working within the county and 12 percent commuting out.

Mono County's total labor force availability remained fairly stable between 2015 and 2019, despite seasonal fluctuations. In April 2020 the unemployment rate reached a high of 28.5 percent, but recovered somewhat by July and remained between eight and ten percent until March of 2021. Since mid-2021, unemployment has dropped and generally remained between three and four percent countywide, which is largely consistent with historical pre-pandemic trends.

This differs in comparison to the Town of Mammoth Lakes, where unemployment generally trended downward over the same time period until stabilizing at around 0.5 percent in 2018 and 2019. The EDD reports that the unemployment rate essentially dropped to zero as of January 2021. If this data is correct, the contraction of the labor force and the decline in the unemployment rate in the Town of Mammoth Lakes implies that businesses in the town are likely being put in the position of needing to scale back operations due to inadequate labor availability or to increasingly rely on alternative labor force pools (e.g., seasonal and international workers, and workers housed within the unincorporated area).

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## TOURISM ACCOMMODATION INDUSTRY TRENDS

Tourism is Mono County's primary economic driver, generating about 50 percent of all jobs in the county as of 2022. The unincorporated county has about 50 permitted lodging businesses, including hotels, motels, and bed and breakfasts, whose rooms and units account for 911 tourist accommodation units (TAUs). The county also has 106 permitted short-term rentals, defined for the purpose of this report as rentals of 30 days or less in a private residence, which make up about 10 percent of all TAUs.

### *SHORT-TERM RENTAL INVENTORY*

The vast majority (90 units, or 85 percent) of STR units with County TOT certificates are in June Lake. These 90 STR units account for 21.9% of the total TAUs in June Lake, compared with the countywide average of 10%. According to AirDNA, 165 short-term rentals exist in the unincorporated county; however, AirDNA's numbers may include motels and/or campgrounds that list or advertise on AirBNB or other online platforms.

These 106 STR units represent about 2.4 percent of the overall housing stock in the unincorporated county, or 7.7 percent of the housing stock held vacant for seasonal and occasional use. The STRs located in unincorporated Mono County are only about three percent of the total STRs in Mono County; the Town of Mammoth Lakes contains 3,701 permitted STR units (although not all may be active), or 97 percent of the total.

Of all permitted STRs, 25 units are located in complexes with Multi-Family Residential-Low (MFR-L) land use designations and 23 units are located in Multi-family Residential-High land use designations, for a total of 48 units (or 45%) of STRs in MFR designations. A total of 36 units, or 34 percent, are located in non-residential designations including Agricultural, Commercial, Commercial Lodging –Moderate and –High, Mixed Use, Rural Resort, Service Commercial. The remaining 22 units, approximately 21 percent, are located in Residential land use designations including: Single Family Residential, Estate Residential, and Rural Residential.

The occupancy rates for online listings range from as little as 39 percent in the Coleville-Walker area to a high of 91 percent in Benton. Both areas feature only a handful of listings and have average daily rates (ADR) of \$105-\$138 per night. June Lake, which accounts for the majority of listings, has an average occupancy rate of 60 percent and an ADR of \$414 per night. ADR in Lee Vining are in the middle at \$252 per night.

More than 90 percent of units listed online for short-term rental had three or fewer bedrooms. Only two areas had listings with four or more bedrooms. Ten percent of June Lake's listings had four or more bedrooms. Topaz, which only had three listings, had one listing that was a four-bedroom single-family home.

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## INDUCED WORKFORCE HOUSING DEMAND

The county has 797 tourist accommodation units in the unincorporated area, including hotels, motels, and short-term rentals, with a latest estimate of about 662,159 occupied room nights per year. Coupled with the associated job production mentioned in the section that follows, it is estimated that 151 occupied rooms support one destination-

visitor job. Out-of-town visitor spending totals \$580.6 million per year for all Mono County, generating 5,990 jobs<sup>1</sup>. Visitor spending averages \$96,928 per supported job.

Visitor spending associated with hotel, motel, and vacation rental overnight visitors approximates \$424.8 million annually. About 73 percent, or 4,383, of all destination visitor-supported jobs in Mono County are associated with overnight visitors. According to the average of 203 occupied nights per STR, and 151 occupied nights per supported job, the project team estimates that the average STR supports around 1.3 jobs across the economy. Assuming 1.65 workers per household, based on data from the U.S. Census Bureau's Public Use Microdata Sample (PUMS), the project team estimates that the county may experience demand for 0.8 new workforce housing units for each new STR that enters the market on average.

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<sup>1</sup> Job creation includes direct jobs, indirect jobs, and induced jobs.

## STAKEHOLDER ENGAGEMENT SUMMARY

This study included a series of six focus groups, five in-person and one online, made up of community members who are involved with either housing, tourist accommodations, or local business in the community. Participants were asked a series of four questions on their perception of a link between STRs and housing availability, the current STR regulations in the county, and suggestions for either improved regulations or incentives for the creation or preservation of workforce housing. While groups differed on their preferred approach to STR regulation, the following common themes emerged:

- **Data:** Participants across the board want to see more data to inform the conversation around STRs and housing in the county.
- **Time and Resources:** Some participants believe the current regulatory process was well-informed and needs more time to take effect, while others believe that housing issues are worsening and need to be addressed now.
- **The Issue of Scale:** Participants disagreed on the importance of scale. Some saw the only answer to solving the housing problem is an increase in development, and others believe that any incremental increase in housing availability for long-term housing rather than short-term rentals would improve the housing situation.
- **Equity Lens vs. Property Owner Rights:** Participants differed in their opinion on the role of the County: some believe it is the County's duty to promote equity through affordable housing, while some believe it is not the county's role to dictate how individuals can or cannot rent their property.
- **Location-Specific Solutions:** People are generally wary of a one-size-fits all solution in the county, and they want to see individual communities considered.
- **Longstanding issue:** Many participants indicated that housing availability has been an issue prior to the conversation around short-term rentals in the county.

Participants were unanimous in that new development is needed to address the issue of housing availability. Suggestions for regulatory changes and incentives for workforce housing development were gathered and used to support the recommendation options for this report.

## CONCLUSIONS AND OPTIONS SUMMARY

The limited number of STRs in Mono County, the relatively small amount of data including number of house sales, and the comparatively strict regulations relative to other jurisdictions all mean that it is difficult to draw a strong correlation between STRs and workforce housing availability in Mono County. Based on the County's history, previous studies, and feedback during stakeholder meetings, the County as a whole, including Mammoth Lakes, has had a long-standing issue with a shortage of affordable housing that pre-dates the more recent growth and prevalence of STRs. At the same time, the prevalence of vacant or second homes has increased.

From a regulatory standpoint, the data show that Mono County's current policies have maintained the primary residential use of single-family residential neighborhoods, while still providing a portion of the bed base in high-tourist areas such as June Lake through STRs. Since 2019, 38 STRs were approved, 31 of which were in June Lake. While not a part of this study, stakeholder feedback and County code enforcement records confirm that Mono County's operational requirements have been successful in preventing unwanted behavior in residential communities. The study did find that the concentration of STRs in the June Lake area (90 percent) may be an area to consider addressing.

The County may want to consider its objectives to determine a course of action or policy change related to STR regulations.

The following outlines some potential policy objectives, with options to achieve each. The policy objectives and accompanying actions are not mutually exclusive and could be combined:

**Policy Objective:** Limit or decrease the number of existing STRs.

- Set a numeric cap on STR permits countywide.
  - o The cap may be set at the current number of permits (106), or
  - o The cap could accommodate for a defined increase, or
  - o The cap could be set at a lower number than existing permits, or
- Set a numeric cap on STR permits in a specified geographic location.

For example, the County may consider capping the number of STRs in June Lake at its current level.

- Change the General Plan and Zoning Code and prohibit STRs in some or all residential areas.

The County may want to phase this in through the permit renewal process.

As a part of any cap, the County may want to establish a lottery or random selection system in the event the number of permits available is less than the number of interested permittees. Alternatively, the County could establish a first-come, first-served system for available STR permits.

**Policy Objective:** Prevent neighborhood impacts and nuisances.

- Retain existing permitting requirements.
- Increase violation fees.
- Increase compliance staffing.

**Policy Objective:** Discourage business investment in or commodification of housing.

- Implement a waiting period before any new property owner can apply for an STR permit.
- Prohibit STR permits for a specified period where an eviction has occurred on properties in the previous two years.
- Require registration for all long-term rentals, or for rentals between 30-90 days if an overall long-term rental registration is too resource-intensive.

This may prohibit individuals from renting properties for more than 30 days to avoid STR regulations and allowing short-term renters to cut the stay short.

- Amend language in the code regarding property rights.

While the Short-Term Rental Activity Permit annual renewal process makes it clear that STR permits do not run with the land, the County Code does not use that explicit language.

- Amend definition of short-term rentals of residential properties to include fractional ownership and/or time shares.
- Prohibit new STRs.

**Policy Objective:** Preserve and encourage workforce housing units.

- Require the same approval process for MFR units as SFR units, presuming that MFR units are primarily intended to be residential uses and appropriate for workforce housing.
- Require a minimum STR size (floor area) for new STR permits to increase the likelihood that smaller housing units are retained as long-term housing and thereby more affordable to the local workforce.
- Partner with an organization to create a renter-owner matching program (non-profit, partnership).

**Policy Objective:** Increase available bed base without affecting long-term rental availability.

- Allow “hosted” STRs and change county definitions and regulations around “occupied” STRs.

A hosted STR could require a long-term occupant on any portion of the property in exchange for allowing an STR, rather than the owner/property manager simply being present for the duration of the rental.

- Exempt hosted rentals from a permit cap (if adopted) or allow in zones that don't otherwise allow STRs.
- Allow a long-term renter to occupy an ADU on a property while still allowing short-term rentals in the main home.

This could be consistent with the General Plan goal of promoting a sharing economy because the ADU would be occupied full time; the primary use would be residential and the temporary short-term rental would remain as an accessory use.

- Allow an ADU to be an STR if the main unit is occupied by the owner or a long-term renter.

**Policy Objective:** Encourage development of new workforce housing units.

- Allow one new STR to be permitted in exchange for three new workforce housing units, based on the job generation rate.
- Publicize the County's pre-approved Accessory Dwelling Unit (ADU) plans.
- Highlight State housing laws that ministerially allow 100% affordable housing developments.
- Offer loans and/or grants for building or rehabilitating or preserving long-term housing.
- Partner with Sierra Business Council or create an ombudsperson position to help shepherd housing development applicants through the development review and permitting process.

**Policy Objective:** Adjust to the market and STR trends.

- Consolidate STR permitting and tracking and create a universal tracking system.
- Collect code compliance data.
- Track and report on STR TOT revenue.
- Track and report on STR permit activity and trends in the County's annual report.

**Policy Objective:** Create an equitable permitting process.

- Consolidate the permitting process into a single unified procedure with a single set of terms and requirements for all permits, regardless of land use designation. This could include the following:



- Require a Use Permit (Planning Commission) and STR Permit (Board of Supervisors) for all residential properties in all residential zoning districts.
- Consider giving VHR permit holders one year to submit an application for CUP and STR permits.
- Continue to require annual renewals for all STR Permits.

**Policy Objective:** Engage with regional partners.

- Encourage the Town of Mammoth Lakes to regulate STRs. Additional regulations in Mammoth Lakes may help to maintain availability of long-term housing, which may help avoid impacts on long-term housing availability in the unincorporated county.

# PART 1

## BACKGROUND

The Mono County Board of Supervisors enacted a moratorium on Short-term Rental permits in single-family residential units, in part, to allow time to study the effects of STRs on the Mono County housing market and to help guide the Supervisors in implementing effective STR policy with respect to housing needs.

The term “Short-term Rentals” or “STRs” is used throughout this Study to refer to privately owned residential units/parts of a unit that are rented for a period of 30 days or less. Specific definitions vary across jurisdictions and may differ based on length of stay, land use designations, and other qualifying factors. The term “Mono County” is used throughout to refer to the unincorporated county, not including the incorporated town of Mammoth Lakes.

The purpose of this Short-Term Rental Study is to examine if and what correlations exist between allowing residential property owners to rent their houses for 30 days or less and the availability and/or affordability of rental and/or for-sale housing. The study is organized into six parts:

- **Part 1: Background:** Provides background on Mono County’s history regulating STRs and frames the purpose of this Study.
- **Part 2: Literature Review:** Summarizes research and analysis conducted for over 50 other jurisdictions related to how STRs are regulated. This analysis can help inform best practices that Mono County can consider.
- **Part 3: Policy Analysis:** Identifies policy options regarding how the County can better regulate short-term rentals to meet both community and County goals.
- **Part 4: Economic Analysis:** Summarizes information and data related to Mono County housing market conditions and trends, tourism accommodation industry trends, and induced Workforce Housing Demand.
- **Part 5: Stakeholder Engagement:** Summarizes community ideas and feedback obtained during a series of stakeholder discussions.
- **Part 6: Conclusions and Options:** Identifies potential policy objectives related to STR regulations and housing, and options to achieve those objectives.

## MONO COUNTY CONTEXT

Mono County is a rural mountain community known for its scenic natural landscapes including parts of the Sierra Mountain range. It is in the central eastern part of the state, bordering Nevada to the east, Mariposa County and Tuolumne County to the west, Alpine County to the north, and Inyo County to the south. The County is accessible to the Yosemite Valley through Tioga Pass in Mono County's town of Lee Vining.

As of the last census, the population in the county was 13,195, which includes the incorporated Town of Mammoth Lakes (with a population of 7,435), as well as multiple unincorporated towns. The unincorporated county has a population of 5,757 and its most populous towns are June Lake and Bridgeport, which is the county seat. Tourism plays a major role in the local economy, as Mono County attracts many seasonal visitors for snow sports in the winter, and hiking, camping, and fishing in the summer. Approximately 94 percent of the land in Mono County is publicly owned, and approximately 88 percent of the public land is federally owned.

## MONO COUNTY STR REGULATION HISTORY

Mono County first began regulating STRs in 2012, and the most recent changes went into effect in 2023 (see **Figure 1** for a timeline and summary of STR regulations). The County's first STR regulations, enacted in June 2012, built on the Transient Occupancy Ordinance that had been first proposed in 2009. These drafts eventually became Chapters 25 and 26 of the Mono County General Plan Land Use Element. Chapter 25, adopted in 2012, established a Transient Rental Overlay District (TROD) and required a General Plan Amendment to allow short-term rentals of residences. The new process was intended "to provide additional tourism-based economic opportunities and homeowner economic stability by allowing a transient rental district to be overlaid on properties within residential neighborhoods exhibiting support for allowing transient rentals." Chapter 26, adopted in 2013, included specific permitting regulations for all short-term rentals.

From April 2013 to May 2015, several TRODs were established within certain areas of June Lake, Mono Basin, Lundy Canyon, and Twin Lakes. Near the end of 2015, the County became aware of a growing concern from residents regarding the impact of STR activity on community character, health, and safety. In February 2016, the Planning Commission and the County Board of Supervisors held a joint workshop on the topic of TRODs, and in March 2016 they enacted an emergency moratorium temporarily prohibiting any new TRODs until the County could consider policy changes.

Starting in 2017, Mono County went through an extensive process to update its STR regulations beginning with an emergency moratorium on non-owner occupied STRs in March 2017. The Board of Supervisors ultimately adopted Ordinance No. 18-07 in May 2018, adding Chapter 5.65 to the County Code establishing Short-Term Rental Activity Permits. The 2018 amendment defined "STRs" as rental units located in residential land use designations; created STR permit and license requirements; established the application, review, and renewal processes; and created operational standards and enforcement of violations. In 2019, the County adopted Ordinance 19-08 adding Chapter 15.40 to the County Code to require housing mitigation for new residential and non-residential developments, while allowing exemptions in cases for units where STRs have been specifically prohibited as a part of the approval process.

Beginning in 2021, the County's post-COVID tourism led to renewed public concern about STRs and housing availability. The County updated its Land Use Element to make a distinction between short-term rental (Chapter 25) and transient rental (Chapter 26) development standards. In May 2022, the county enacted the latest emergency moratorium on allowing any new STRs in single family residences, which runs through April 2024.<sup>2</sup>

**Figure 1. STR Regulation History**



<sup>2</sup> July 2023 the county commissioned the STR report to help inform the Board ahead of the moratorium expiration date.

## PART 2

# LITERATURE REVIEW

The following summarizes key findings from a review of over 50 peer reviewed academic articles and industry publications about the impacts of STRs on housing and hotel markets. A full bibliography is provided at the end of this report.

### *GEOGRAPHIC REPRESENTATION*

Nearly all the available literature on the impacts of STRs reflects research conducted using data for large metropolitan areas, such as Barcelona, London, Los Angeles, New York City, and San Francisco, among other global destinations. Where possible this research highlights key findings from studies focused on non-urban markets. The research also intentionally included the review of professional studies conducted for jurisdictions throughout the Mountain West to account for potential differences in the ways that STRs impact housing and the hotel industry in smaller, less urbanized, markets.

### *LIMITATIONS OF THE LITERATURE*

Among the known limitations of the available literature are the inherent complexity and data intensiveness of the required research methods. There is also the possibility that the research omits significant variables that have a bearing on the relationship between STRs and long-term housing availability and pricing, as well as occupancy and rates within the tourist accommodations industry. The academic literature also relies heavily on data that is “scraped” from the online platforms, which is known to often be incomplete and sometimes inaccurate; for example, listings for private rooms may be in hotels or lodges rather than a room in a single-family home. The professional literature, by comparison, primarily relies on broad trends analysis, versus robust statistical analysis, which yields less confident conclusions. Therefore, the research findings summarized here should be interpreted with caution.

## HOUSING AVAILABILITY AND AFFORDABILITY

### FINDINGS FROM THE ACADEMIC LITERATURE

The literature examined impacts in a variety of geographic locations, such as international locales, density (e.g., urban and rural/mountain communities), market-orientation (industry-funded vs community-funded), purpose (housing impacts vs tourism market impacts), and timing (2016-2023). The studies universally found a relationship between housing availability and STRs, and the extent of the relationship depends upon concentration. That is, there needs to be a significant concentration of STRs to have a substantive impact, though the threshold for significance is likely to vary across communities and destination economies.

The peer-reviewed academic literature consistently found statistically significant relationships between the number of STR listings in a market and the availability and pricing of long-term housing, both rental and for-sale. These studies also found that in destination markets, increasing demand for short-term renting incentivized the conversion of housing that may have otherwise been available for long-term

occupancy, a process referred to as the ‘hotelization’ of the housing stock. The research also found that an increase in the number of STRs also increases the prevalence of nuisance issues, like traffic, parking, and noise.

Research also found that STRs tend to be concentrated close to major tourist attractions, and that greater concentrations of STR listings correlated with more significant impacts to the housing and tourist accommodations markets. The research also indicates that the negative effects of STRs are stronger in places with less owner-occupied housing and smaller inventories of alternative hotel and motel accommodations. Also, smaller communities that are more dependent on transient occupancy taxes and that have more limited inventories of available rental housing may experience greater impacts.

The available research generally indicates that the relationship between the prevalence of STRs and housing affordability is stronger for for-sale home prices compared to rents. This is because buyers are often willing and able to pay more for a unit based on how much income the unit can generate on the STR market. Rental housing prices, by comparison, are impacted indirectly through reductions in the supply of long-term rentals, which increases pricing competition between renter households.

The research identifies an increasing prevalence of investor-owners in certain markets, including a rise in owners with multiple properties. This reflects the function of second homes and STRs as speculative assets, which have the potential for capital appreciation, but which can also generate rental income during the hold period to defray costs. This can entice investors to purchase properties not for their own use, and to hold “onto properties for longer than they might otherwise since they can offset carrying costs.” Wachsmuth and Weisler (2018) referred to this process as “gentrification without redevelopment.” Nonetheless, one study found that local regulation can have a substantive impact on the composition of the STR market, including decreasing the prevalence of hosts that own and manage multiple listings.

**Table 1** below summarizes the statistical relationships between the prevalence of STRs and long-term rental rates and for-sale home prices, as documented in the available literature. The magnitude of the impacts ranged from relatively marginal to fairly significant; though the significant growth in the sector in recent years may result in sizable cumulative impacts over time in some markets .

**Table 1: Summary of Literature Review Findings of the Impacts of STRs on Rental and For-Sale Home Pricing**

<b>Author</b>	<b>Published</b>	<b>Geography</b>	<b>Effect on Rents</b>	<b>Effect on Sale Prices</b>
Goncalves, et al.	2022	Lisbon	n.a.	8% increase on average and 20% for two-bedrooms resulting from a ban
Shabrina, et al.	2022	London	8.0% increase per 100% increase in illegal/ non-conforming STRs	n.a.
Benitez-Auriole, et al.	2021	London	0.014% increase per 100 listings	0.032% increase per 100 listings
Franco & Santos	2021	Portugal	n.a.	3.7% increase per 1% increase in STRs
Koster, et al.	2021	Los Angeles	4.9% increase per 1% increase in STR listings	5.1% increase per 1% increase in STR Listings
Thackway, et al.	2021	Sydney	n.a.	2% increase per 1% increase in STR density
Etxezarreta-Etzarri, et al.	2020	San Sebastian	7.3% increase per standard deviation increase in STR listings	n.a.
Garcia-Lopez, et al.	2020	Barcelona	1.9% increase in areas of low concentration and 7.0% increase in areas of high concentration, for every 200 listings	4.6% increase in areas of low concentration and 7.0% increase in areas of high concentration, for every 200 listings
Zou	2019	Washington DC	n.a.	0.66% - 2.24% Overall
Barron et al.	2018	United States	0.018% increase per 1% increase in STR listings	0.026% increase per 1% increase in STR listings
Lee	2016	Los Angeles	0.2% increase per 1% increase in STR listings	n.a.
Merante & Horn	2016	Boston	0.4% increase per standard deviation increase in STR listings	n.a.
Sheppard & Udell	2016	New York	n.a.	Doubling STRs equals 6.0-31% increase

Source: BAE, 2023.

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## FINDINGS FROM PROFESSIONAL LITERATURE

Private consulting firms have completed several studies for local jurisdictions and stakeholder groups throughout the country regarding the impacts of STRs on local housing markets, including in more rural communities and mountain resort destination markets. The research included two industry sponsored studies, six studies that relied on market trends analysis, five that estimated the impact of new STRs on demand for long-term housing, and three studies that used statistical methods to estimate the impact of STRs on the supply of long-term housing.

### *INDUSTRY SPONSORED STUDIES*

The earlier of the two industry sponsored studies reviewed for this research (ECONorthwest 2016) found no significant association between STRs and housing availability and pricing, though these findings were determined to be suspect due to the client HomeAway's vested interest in the outcome of the research. The second industry sponsored study was conducted by HR&A on behalf of Airbnb in Colorado in 2022 and did find a rough association between STRs and the housing market but recommended increased subsidies for affordable housing and workforce construction and preservation, rather than additional STR regulation.

### *STR AND HOUSING MARKET TRENDS ANALYSIS*

Six studies completed by third-party consultants used market trends analysis to highlight relevant associations between STRs and local housing markets. Four of the studies were prepared by BAE for Placer and Mariposa counties and the towns of Truckee and Mammoth Lakes. These studies found likely associations between the prevalence of STRs as a share of the total housing stock and local housing market conditions, though the severity of the observed impacts differed based on the level of STR concentration.

Other studies prepared by Beacon Economics for San Luis Obispo County, by PlaceWorks for San Bernardino County, and by the Milken Institute for the State of California, found that the relative concentration of STRs within each area was not sufficient to indicate that STRs were a significant driver of housing market conditions within each area. This reinforces the conclusion identified in the academic literature that the relative concentration of STRs within a market is a likely determinant of the relative influence that STRs may have on housing availability and pricing and that proximity also plays a significant role. However, these studies fail to consider impacts below the state or county level, and as such, may miss impacts that occurred within specific communities where the concentration of STRs is greater.

### *WORKFORCE HOUSING DEMAND IMPACTS*

Five professional studies used quantitative methods to evaluate the relationship between the addition of new STRs to the market and new induced workforce housing demand. These reports include studies prepared by BAE for the Town of Truckee and Mariposa County, which applied the same methodology used in this report, as well as a study prepared by Economic and Planning Systems (EPS) for the town of Breckenridge in Colorado, and a study prepared by Root Policy Research for the town of Pagosa Springs, also in Colorado. The key findings from these studies are summarized in **Table 2**.



The key findings summarized below indicate that visitor spending associated with the creation of 100 new STRs can result in demand for anywhere from 10 to 80 new workforce housing units. The reasons for this wide variation are not entirely clear, but may reflect the relative dependence of Mariposa and Mono counties on the tourism industry.

**Table 2: Summary of Literature Review Findings of the Impacts of STRs on Induced Workforce Housing Demand and Reduced Long-Term Housing Supply**

Author	Published	Geography	Induced Workforce Housing Demand Per 100 New STRs	Supply Impacts to Long-Term Housing	
				For-Sale	Rental
BAE Urban Economics	2023	Mono County, California	69.8 Units	n.a.	n.a.
PlaceWorks	2023	San Bernardino County, California	n.a.	n.a.	n.a.
BAE Urban Economics	2023	Mariposa County, California	64.9 Units	n.a.	n.a.
Beacon Economics	2023	San Luis Obispo County, California	n.a.	n.a.	n.a.
BAE Urban Economics	2022	Truckee, California	17.2 Units	n.a.	n.a.
Milken Institute	2022	California	n.a.	n.a.	n.a.
Root Policy Research	2022	Estes Park, Colorado	n.a.	-0.011% to -0.022% per 1% increase in STR listings	-0.014% to -0.041% per 1% increase in STR listings
Root Policy Research	2022	Pagosa Springs, Colorado	11.6 Units	-0.012% to -0.023% per 1% increase in STR listings	-0.015% to -0.041% per 1% increase in STR listings
Economic & Planning Systems, Inc.	2021	Breckenridge, Colorado	11.0 Units	n.a.	n.a.
Michael Baker International	2017	South Lake Tahoe, California	n.a.	n.a.	n.a.

Source: BAE, 2023.

### WORKFORCE HOUSING SUPPLY IMPACTS

An additional study prepared in 2017 by Michael Baker International and two studies prepared more recently by Root Policy Research go a step further, estimating the statistical relationships between the STRs and the availability and pricing of housing for long-term occupancy using statistical methods similar to those reflected in the academic literature. These studies both found statistically significant relationships between STRs and housing pricing and availability; however, the Root Policy Research studies highlight the dependence on state- and regional-level data which can reduce the utility of this type of research when analyzing smaller, more diverse, communities with different underlying market dynamics.

## LODGING INDUSTRY OCCUPANCY AND RATES

### FINDINGS FROM THE ACADEMIC LITERATURE

The negative effects of STRs on the lodging industry have been shown to vary widely across different hotel classes, seasons, types of locations, and regions. Overall, the research suggests that the impacts from STRs are mainly limited to less aggressive pricing, though some studies did identify impacts to hotel and motel occupancy.

Because the STR units can enter and exit the market at-will, the supply is considered 'instantaneous' and can readily supplement hotel inventory during peak periods. This can reduce the need to make significant investments in new hotel inventory that may go underutilized during much of the year. CB Richard Ellis, a major global real estate firm, recommended as early as 2020 that hotel operators and investors conduct detailed analysis on the quantity and quality of STR product offerings in any market where 10 percent or more of the supply of tourist accommodations is made up of STR units. In more recent years, some hotel operators have begun integrating home sharing like attributes and experiences to more effectively compete with STRs, such as with the townhome type units recently added to the property at Outbound in Mammoth Lakes.

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## PART 3

# POLICY ANALYSIS

The State of California (State) allows local jurisdictions to tax the rental of individual residences for 30 days or less because these rentals are considered transient lodging along with hotels, motels, and bed and breakfasts. By contrast, rentals of more than 30 days are considered housing, cannot be taxed, and confer housing rights to occupants.

Terms, definitions, and regulations of residential-based transient lodging differ across jurisdictions. As further detailed below, jurisdictions use terms that include short-term rentals, vacation (and vacation home) rentals and transient lodging. For the purposes of this Study, the comparative analysis focuses on the use of private homes for durations of 30 days or less, no matter the term used. The following is a summary of the major policies and regulations in place in Mono County and comparable jurisdictions.

### MONO COUNTY

#### REGULATORY CONTEXT – SHORT-TERM RENTALS

Mono County's General Plan Land Use Element regulates Short-Term Rentals (STRs) through a combination of Land Use goals, objectives, and policies, land use designation-specific policies, and definitions. The term "short-term rentals" is generally used for residentially designated areas, while "transient rentals" is used for non-residential areas, such as commercial and mixed use, as further detailed in the definition section below. In addition, Mono County's General Plan Land Use Element Chapter 25 contains specific STR regulations, and Chapter 26 contains specific transient lodging regulations.

The Land Use Element, last updated in 2021, identifies the potential link between short-term rentals and available workforce housing, specifically in residential areas. The county's Housing Element, last updated in 2019, indicates that "The County has taken an active approach to slowing down the rate of increase [of housing vacancy] by adopting strict short-term rental regulations in 2018 requiring a multi-tiered discretionary permit process. The County will continue to explore ways to incentivize long-term rentals over short term." The county cited the decrease in the overall number of renters in the unincorporated County and changes to occupancy rates in Census Designated Places (CDPs) in support of this regulatory approach:

*"The overall number of renters in the unincorporated area decreased from 40% of all occupied units in 1990 to 32% [in] 2010. The south county CDPs generally have very high rates of owner-occupied units, the highest being Paradise at 95.9%. North county CDPs have higher renter occupied units with Coleville the highest at 71.9% due to the marine base housing. Vacancy rates continue to increase as more units are used for second homes and short-term rental units. The overall vacancy rate in the unincorporated county increased from 34.4% in 2010 to 48.2% in 2016."*

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## CURRENT REGULATION SUMMARY

Mono County's STR regulations contain the following key components, which are also displayed in the tables below:

### DEFINITIONS

- Short-term Rentals are defined as single family units with a residential land use designations (ER, RMH, RR, SFR).
  - **Owner-Occupied:** requires the owner to live on site, or in a unit on the same parcel or a physically contiguous adjacent parcel. The owner must be present during the rental. (MCC 25.02).
  - **Non-Owner-Occupied:** applies to rentals of an entire unit or portion thereof not currently occupied by the property owner on the same parcel or a physically contiguous parcel. (MCC 25.02).
  - Further limitations on Owner-Occupied and Non-Owner Occupied are detailed in **Table 5** below.
- Transient rentals are defined as residential structures with non-residential land use designations (C, CL-M, CL-H, MU, NHP, RU, SC), or with MFR-H zoning, or located in a Transient Rental Overlay District, the General Plan land use designation that was previously used for permitting short-term rentals in the County.

### LAND USE LIMITATIONS

- STRs are conditionally permitted uses in residential land use designations: Estate Residential (ER), Rural Mobile Home (RMH), Rural Residential (RR), and Single Family Residential (SFR). That is, in order to operate a short-term rental in these designated residential areas, a discretionary use permit and a STR permit are required (see below for details).
- New STRs are NOT allowed in MFR-L or MFR-M. However, new STRs in the Interlaken, Edgewater, and Sierra Suns condominium complexes are grandfathered as existing non-conforming uses because the entire complex has historically been managed as nightly rentals, and therefore do not require discretionary permits.
- Transient Rentals are generally allowed, with proper permitting, in TRODs, in Multi-family Residential-High (MFR-H) land use, or non-residential land use designations: Commercial (C), Commercial Lodging –Moderate (CL-M) and –High (CL-H), Mixed Use (MU), Natural Habitat Protection (NHP), Rural Resort (RU), and Service Commercial (SC).

## GEOGRAPHIC LIMITATIONS

- In June Lake, STRs are only allowed in SFR land uses, and are not permitted in any other residential land use designations, with the exception of the existing nonconforming uses mentioned above (MCC 25.015).
- Non-Owner Occupied STRs are prohibited in Mono City, Long Valley, Tri-Valley, Paradise, and certain areas within June Lake.
- The total number of Owner Occupied STR activity permits in the upper Clark Tract of June Lake (excluding Nevada Street/Silver Meadow) may not exceed eight (8) parcels and are limited to summer rentals only.
- Mono City and Swall Meadows prohibit all STRs types.

## PERMIT REQUIREMENTS

- STR requirements:
  - Approval of a Use Permit through a public hearing before the Mono County Planning Commission.
  - Approval of an STR Activity Permit through a public hearing before the Board of Supervisors.
  - Existing non-conforming STRs in the MFR-L and MFR-M land use designations are permitted outright, and only require a business license and TOT Certificate.
  - During the current moratorium no new STR permits for single family residential units are allowed in any land use designation.
- Transient Rental requirements:
  - Approval via a Director Review permit for units in C, CL-M, CL-H\* with 1-3 units, Mixed Use (MU), Natural Habitat Protection (NHP), and Service Commercial (SC) land uses.
  - Approval of a Use Permit through a public hearing before the Mono County Planning Commission and ministerial approval of a Vacation Home Rental permit (VHR) for units in MFR-H, CL-M/CL-H\* with 4 or more units and RU land uses.
  - \*Transient rentals in the CL-M, CL-H where units are under individual ownership are permitted outright, and only require a business license and TOT Certificate.

## LICENSE REQUIREMENTS

- A valid Business License and TOT certificate is required for all short-term rental operations.

- For non-owner occupied rentals, a separate duly-licensed management company or property manager is required.

### OPERATIONAL REQUIREMENTS

- Health and Safety: Fire and carbon monoxide monitors, consideration of flammable materials, landline phone required, etc.
- Sign, Notification and Advertising Requirements: Transient rental notification posted on exterior with 24-hour contact of property owner or manager; interior notification on process for waste disposal, parking, and emergency evacuation; STR permit # must be included in all advertising.
- Occupancy: Maximum 10 persons, maximum two per bedroom.
- Parking: Requirements per Mono County General Plan, no off-site or street parking allowed.
- Trash and Solid Waste Removal: Available trash receptacles, must be removed at least once a week during period rented.
- Snow Removal: the property owner is required to remove snow from walkways and driveways prior to rental period.
- Other: Dark Sky Regulations for lighting, including updating fixtures if needed to comply; owner or manager must be available to respond within an hour; hidden key is required for emergencies; quiet hours apply from 10pm to 7am; and outdoor amplified sound is prohibited at all times.

### RENEWALS

- Short-Term Rental Activity permits expire on August 31st of each year unless renewed or revoked (MCC 5.65.080).
- Vacation Home Rental permits expire if the property changes ownership.
- Business Licenses and TOT Certificates require annual renewal.

### COSTS

- One-Time Fees: All permits, including but not limited to STR Activity permit, Use permit, and Vacation Home Rental permit, and required inspections, incur a fee.
- Housing Mitigation Fee: All new STRs and visitor accommodations must pay a commercial linkage fee (aka housing mitigation fee), consistent with MCC Chapter 15.40.
- Annual Fees: All annual renewals of STR Activity permits are subject to fees.
- Taxes: A valid Transient Occupancy Tax certificate is required for all short-term rental operations.

**Table 3: Permit Requirements, by Land Use Area**

PERMIT REQUIREMENTS, BY LAND USE AREA				
	STR Activity Permit- (BOS)	Use Permit- (PC)	VHR Permit- (County Staff)	Business License & TOT
ER, RMH, RR, SFR	✓	✓		✓
MFR-L, MFR-M				✓**
C, MU, SC		DR permit		✓
NHP, CL-M/CL-H 1-3 UNITS		DR permit		✓*
MFR-H		✓	✓	✓
CL-M/CL-H 4+ UNITS		✓	✓	✓*
*Where units are owned individually, only require a business license and TOT Certificate				
**Existing non-conforming uses, no new complexes allowed				

**Table 4. Owner-Occupied/ Non-Owner Occupied STRs Allowed, By Area**

OWNER-OCCUPIED / NON-OWNER-OCCUPIED STRS ALLOWED, BY AREA		
	OWNER OCCUPIED	NON-OWNER OCCUPIED
Long Valley, Tri-Valley, Paradise	✓	
Swall Meadows		
Mono City		
Mono Basin (excluding Mono City)	✓	✓
Bridgeport Valley	✓	✓
Antelope Valley	✓	✓
June Lake		
Upper Clark Tract (excluding Nevada Street/Silver Meadow)	Limited to 8, summer only	
Petersen Tract		
Williams Tract		
Hwy 158 Hillside	✓	
Highlands		
Other - Nevada St, Silver Meadow, Dream Mtn, Leonard Ave	✓	✓
Areas not listed, including Twin Lakes and Virginia Lakes, are allowed both types of short-term rentals subject to Use Permit and Activity Permit. Some areas may have seasonal restrictions due to avalanche hazards.		

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## POLICY CONTEXT – HOUSING

Mono County's General Plan contains housing-related goals and policies that identify strategies to increase and maintain available housing stock unrelated to the regulation of short-term rentals. The following is an overview of the County's housing policies to provide context for the issue of housing in the county overall.

### *HOUSING GOALS*

Mono County's Housing Element, updated in 2019, includes four goals and associated programs and objectives. Goals 1 and 2 call for increasing the overall housing supply, and specifically the supply of "community housing" which is to provide adequate, affordable housing for long-term residents. Goal 3 is to retain existing community housing, which includes incentives and resources to rehabilitate existing housing stock for the purposes of long-term rental and monitoring the conversion of permanent housing or long-term rental housing into transient rentals, particularly within the Transient Rental Overlay Districts.

Mono County's Land Use Element includes goals specific to each planning area, and many include specific Housing Goals. For example, June Lake's Housing Goal 14 calls for providing a diverse, affordable, and quality housing stock that is available year-round. Associated objectives include requiring new developments to provide a share of affordable workforce housing to meet any associated increase in demand, coordinating with developers to incentivize the creation of new workforce and affordable units, and engaging with the United States Forest Service (USFS) to encourage an update in their rental policy agreements.

### *HOUSING MITIGATION REQUIREMENTS*

Chapter 15.40 of the Mono County Code identifies the lack of available housing stock in the county as a problem, and outlines Housing Mitigation Requirements for all new developments, including a calculation of affordable units or payment of an in-lieu fee. Mono County also applies a commercial linkage fee to new short-term rental activity.

### *ACCESSORY DWELLING UNITS*

Mono County encourages the development of ADUs as a part of its goal to increase the overall housing supply, and related resources include providing pre-approved construction plans through the county website. The County currently prohibits short-term rentals in all new accessory dwelling units, but three existing ADUs in the county are allowed as STRs as existing non-conforming uses.



## POLICY COMPARISON

Nineteen similar jurisdictions' short-term rental regulations were analyzed to compare the policy rationale and regulatory approach relative to Mono County. The jurisdictions were in California, Oregon, Idaho, Wyoming, and Colorado and have similarities to Mono County in terms of mountainous geography, tourism as a major component of the economy, and the presence of rural areas with increasing housing costs.

Three jurisdictions do not have any permit, license, or transient tax requirements for short term rental activity (Eagle County, CO; Gunnison County, CO; and Blaine County, ID) and are not detailed in the charts below. At the time of publishing, Eagle County is in the process of developing regulations but has not yet passed any related ordinances.

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## POLICY RATIONALE

Each comparison jurisdiction has individual purposes for regulating Short-Term Rentals. However, rationale generally falls into the following categories, as shown in

**Table 6:**

- Health and Safety, which may refer to the general wellness of the surrounding community, as well as safety concerns for tourists such as transient occupants in rural zones that are potentially beyond emergency access.
- Mitigating Nuisances, which may include concerns about trash, parking, noise, litter, etc. associated with short-term rental occupants.
- Preservation of Community Character, which is a general term usually used to describe the look and feel of residential neighborhoods but not specifically defined.
- Effect on Workforce Housing, such that STRs are considered to have a negative impact on availability.
- Environmental Concerns, including the degradation or disruption of the surrounding environment or ecosystems, and/or the unsustainable use of resources such as water and electricity.
- Tourism/Rental Needs, where the jurisdiction recognizes the need for short-term rentals and has implemented a system to support it.

**Table 5. Policy Rationale, by Jurisdiction<sup>3</sup>**

POLICY RATIONALE, BY JURISDICTION						
	Health and Safety	Mitigating Nuisances	Preservation of Community Character	Effect on Workforce Housing	Environmental Concerns	Tourism/Rental Needs
Mono County	✓	✓	✓	✓		✓
Mammoth Lakes	✓	✓		✓		✓
Truckee	✓	✓		✓	✓	
Placer County	✓	✓			✓	
South Lake Tahoe	✓	✓		✓		
City of Big Bear Lake			✓			✓
Summit County			✓			
Aspen	✓			✓	✓	✓
Pitkin County	✓			✓	✓	
Steamboat Springs			✓	✓		
Routt County				✓		
Telluride			✓			
San Miguel County	✓					
Ketchum	✓		✓			✓
Bend			✓			
Jackson	✓		✓	✓	✓	
Teton County	✓		✓	✓	✓	

<sup>3</sup> Policy rationale is based on the most up-to-date code available and may not capture rationale of previous iterations or all related policy.

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## STR REGULATION

In general, the comparison jurisdictions' STR permit and/or license requirements vary based on land use designations or rental type.

### TERMS

- **Short-term Rentals (STRs):** For the purpose of this comparison section, short-term rental is used to describe any residential unit that is used for the purpose of overnight rentals. Some jurisdictions, such as Mono County, differentiate these rentals based on land use, owner- and non-owner-occupied, etc.
- **Permit:** This refers to a land-based approval that allows for a particular use of a site. Sub-categories may include Use Permits, Activity Permits, and more. These may or may not run with the land and/or be transferable to different property owners. Typically, elected officials do not review or approve/deny permits, although Mono County Board of Supervisors must approve Short-Term Rental Activity permits in residential designations.
- **Use Permit:** This is a discretionary land use permit that requires a public hearing and typically is approved by a Zoning Administrator or Planning Commission.
- **Vacation Home Rental Permit:** Some jurisdictions use this term instead of short-term rental (e.g., South Lake Tahoe). In Mono County, this type of permit refers to a permit for a residential structure located in a non-residential land use designation that is issued by staff.
- **Transient Rental Certificate:** This is a term unique to the Town of Truckee and is required to operate an STR. Rather than in most jurisdictions which require a permit, in the case of Truckee the TR certificate is attached to an individual is transferable.
- **License:** Typically, this is a legal document issued by a jurisdiction that is attached to an individual and is not transferable, such as a Business License.
- **Hosted vs Non-Hosted Rentals:** Some jurisdictions differentiate STRs where the owner is present in the unit during the rental, such as through the rental of a private bedroom within a home, and the rental of an entire unit without the presence of the owner. Another variation is the "occupied" vs "non-occupied" rental. While the legal definition differs depending on the phrase used and what language the jurisdiction uses to define it, for the purposes of the comparison both types are included under "hosted vs non-hosted".
- **Transient Zoning Overlay:** Some jurisdictions have created a specific zone or set of zones that override existing land use designations to allow for STR activity. Terms in this category may include Transient Rental Ordinance District, Lodging Overlay, and Planned Resort Zone.

- **Housing Mitigation**

- **One-Time Fee:** This may be framed as a housing mitigation fee, a housing impact fee, or a housing in-lieu fee, all of which are under the same category for the purpose of this comparison. This refers to a commercial linkage fee as a requirement for new developments, usually as an alternative to creating additional affordable housing units, and is a policy response used to address a lack of affordable housing in a jurisdiction.
- **Ongoing Fees:** This may be an annual fee or ongoing tax for certain uses or activities that are considered to have an impact on housing.

## COMPARISON OVERVIEW

**STR Permit Requirements:** Out of the 16 jurisdictions included, 10 require some type of permit to operate an STR. As noted above, Truckee requires a Transient Rental Certificate. In Pitkin County, Steamboat Springs, and Bend, an STR Operating license is required.

- **Use Permit:** Two jurisdictions require a Use Permit for certain types of STRs in addition to other permits and/or licenses. In Bend, all STR types require a Use Permit except for those in a specific list of communities. In Mono County, all STR types require a Use Permit except for those in a Commercial, Mixed Use, and Service Commercial designation, and Commercial Lodging- High, or Natural Habitat Protection designation with 1-3 units (not individually owned), all of which require a Director Review permit. Jackson, WY requires a Use Permit as the primary permit for STR operation.

**Fees:** All jurisdictions require a fee for permit processing. Some may require a deposit, and some may require additional fees including an annual renewal fee or annual inspection fees. Fees range from \$100 permit fee to \$1,500 or more when accounting for permits and inspections.

**Permit Renewals:** Of the 13 that require a permit or license, 11 jurisdictions require an annual renewal. San Miguel County requires a renewal every 2 years. The Town of Truckee requires an annual renewal for the Transient Rental Certificate.

**Transferability:** For most jurisdictions, STR permits are non-transferable if the unit is sold, except with some exceptions such as to immediate family members. In these cases, new owners must re-apply for required STR permits. In Truckee, Transient Occupancy Certificates are transferable between both units and owners through the Short-Term Rental Workforce Housing Token Program.

**Waiting Period:** A few jurisdictions implement a waiting period after the purchase of a home before being able to apply for an STR permit. In Truckee and South Lake Tahoe, for example, new property owners must wait one year before applying. The waiting period reduces the ability to commodify the residential unit because it cannot generate immediate income.

### Unit/ Rental Type Limitations:

- **Hosted Rentals:** Seven jurisdictions distinguish between hosted and non-hosted rentals where the latter type is either more limited by zone or total number, or have more permit and /or license requirements. In Steamboat Springs, Placer County, South Lake Tahoe, and Aspen, hosted STRs are exempt from any permit caps.
- **MFU vs SFU:** Some jurisdictions identified make a process distinction between single-family units and multi-family units. As described above, Mono County has some process differences for individually owned MFUs in non-residential land uses, where only a Business license and TOT certificate is required, whereas Truckee and Placer County prohibit STRs in multi-family units.

**Accessory Dwelling Units:** STRs are not allowed in Accessory Dwelling Units in Mono County, Truckee, Mammoth Lakes, San Miguel County, Teton County, Placer County, or in Steamboat Springs, where they are referred to as Secondary Units.

In Summit County, an occupied rental can apply to a single-family home if the Qualified Occupant resides in an ADU on the same parcel, but the ADU itself cannot be rented as an STR.

**Land Use Limitations:** Many jurisdictions regulate STRs based on the land use designation of the site. For example, in Mammoth Lakes no transient rentals are allowed in residential Multi-family 1, Residential Single Family, or Rural Residential land use zones. Routt County only allows STRs in commercial land use zones, and in South Lake Tahoe, no new STR permits can be issued in residential land use zones and existing permits will be phased out.

- **Transient Zoning Overlay:** Summit County, Jackson, and Teton County have all implemented some form of a zoning overlay, which specifically allows STRs in certain zones/ land use designations that they would not otherwise be allowed. While similar to Mono County's past practice (TRODs), the other jurisdictions proactively created the zoning overlay, whereas Mono County allowed applicants to propose the overlay area through a discretionary approval process.

**Permit Caps:** Truckee and Placer County have set a numeric cap on STR permits allowed in the jurisdiction; in Truckee a waitlist has been established, and as of the time of publishing Placer County has not yet reached its capacity. In Steamboat Springs, the city has been divided into Zone A, which is the STR Overlay Zone and has no permit limits, Zone B, where STR permits have been capped at the current number, and Zone C where STR permits are prohibited. Aspen implements permit caps for non-owner occupied STRs in certain zones, and South Lake Tahoe caps the total number of hosted rentals allowed.

**Regulations on Time Rented:** Telluride, Jackson, Pitkin County, and Summit County limit the number of rentals and number of days rented allowed for STRs. In Telluride, for example STRs cannot exceed three separate rentals or a total of 29 days of rental for STRs in residential zones, and in Aspen, Owner-Occupied STRs are limited to 120 rented nights. Some jurisdictions, like Ketchum, require a minimum stay of two nights.

**Limit on Permits per Individual:** Mono County is the only jurisdiction that does not allow an individual to have more than one STR Permit and where a permit applies to only one unit. In Aspen, for example, an owner may apply for one permit for multiple STR units.

**Proximity Limits:** Bend, Oregon for example does not allow a new STR to be permitted within 500 feet of an existing permitted STR.

**Operational Requirements:** All jurisdictions that had some STR requirements also regulate the STR activity and operations. While the range and specific categories vary, most standards address health and safety issues, potential nuisances, minimum on-site parking, noise levels, and waste disposal.

- **Notice/Posting:** All jurisdictions with permit requirements include some noticing requirements. Most require STR units to have their permits posted on-site on the exterior of the site, and some, such as Mono County, require online postings to include permit numbers.
- **Occupancy:** Many jurisdictions include maximum occupancy standards. Similar to Mono County, for example, San Miguel County limits the maximum occupancy to 10 people and two per bedroom.
- **Other:** Snow removal by owner, fire and carbon monoxide monitoring, evacuation plans, a landline phone, and manager or owner available within a reasonable distance were all common requirements in the jurisdictions studied.

**Business License Requirements:** Telluride requires a specific STR business license as the primary regulation on STRs, but no additional permits. In other cases, a business license is required in addition to other permits such as in Mono County, Mammoth Lakes, Aspen, and Jackson.

**Tax Requirements:** With the exception of the three jurisdictions with no STR requirements, all other jurisdictions required registering for a tax for all STR activity. In California, this is referred to as a Transient Occupancy Tax (TOT).

**Housing Mitigation Requirements:** 16 of the jurisdictions included have adopted some type of Housing Mitigation Requirements for new developments, including an in-lieu fee option. Mono County requires a Housing Mitigation fee for all new STRs, and Telluride requires an ongoing Affordable Housing Tax for all STR activity. Aspen requires an ongoing tax for all STR activity, 70% of the revenue of which will be used for affordable housing programs.

**Table 6. STR Requirements, by Jurisdiction<sup>4</sup>**

	STR Permit	Use Permit	Business License	Hosted vs Non-Hosted	Annual Renewal	Permit Cap	Zoning Overlay	TOT	STR Housing Mitigation
Mono County	✓	✓	✓	✓	✓		✓	✓	✓*
Mammoth Lakes			✓					✓	
Truckee	✓ <sup>^</sup>				✓	✓		✓	
Placer County	✓			✓	✓	✓		✓	
South Lake Tahoe	✓			✓	✓	✓		✓	
City of Big Bear Lake	✓				✓			✓	
Summit County	✓			✓	✓		✓	✓	
Aspen	✓		✓	✓	✓	✓		✓	✓*
Pitkin County	✓ <sup>^</sup>				✓			✓	
Steamboat Springs	✓ <sup>^</sup>			✓	✓	✓	✓	✓	
Routt County								✓	
Telluride			✓					✓	✓*
San Miguel County	✓							✓	
Ketchum	✓				✓			✓	
Bend	✓ <sup>^</sup>	✓		✓	✓			✓	
Jackson		✓	✓		✓ <sup>**</sup>		✓	✓	
Teton County		✓ <sup>~</sup>	✓				✓	✓	

<sup>^</sup>The Town of Truckee issues a Transient Lodging Certificate; Pitkin County, Steam Springs, and Bend require an STR License.

\*In Mono County, this is a one-time fee; In Aspen, Telluride this is an ongoing tax.

\*\*Annual renewal only required for units outside of the lodging overlay

~STRs are restricted to a pre-determined list of communities within the Lodging Overlay. New STRs require a Use Permit while some exist as non-conforming uses with no permit required.

<sup>4</sup> STR regulations are based on the most up-to-date code available and may not reflect ordinances in the drafting stages or code that has not been updated online.

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## KEY HIGHLIGHTS

### *STRICTER REGULATORY APPROACHES*

Of the jurisdictions included, Mono County has one of the highest levels of permitting and license requirements for STRs in residential land uses, particularly given the two permits required and the need for Board of Supervisors approval of an activity permit. However, the County is more permissive in other ways, such as in the case of MFUs in the Commercial Lodging Zones, when units are individually owned, only a Business License and a TOT certificate are required for STR activity.

In comparison, Mammoth Lakes and Routt County have relatively few permit requirements for STRs while they broadly restrict where STRs are allowed or not allowed outright. Truckee and Steamboat Springs have both put a hold on any new STR permitting, and Teton County prohibits short-term rentals outright except for a predefined list of specific cabins, condos, and apartment complexes. All these jurisdictions include a concern about workforce housing as a rationale for regulating STRs, and it follows that the resulting policy is stricter regulation, especially in residential zones.

### *WORKFORCE HOUSING PRIORITY HIGHLIGHTS*

Some jurisdictions have identified a link between STR activity and a shortage of workforce housing, and are actively restricting STRs to address the issue, such as Routt County based on their 2022 Master Plan. Jackson and the surrounding Teton County are an example of municipal and county governments creating a joint General Plan that includes workforce housing as a priority. The two jurisdictions regulate short-term rentals and operate a specific Workforce Housing Program which reserves a certain stock of housing, with both ownership and rental options, for households who have at least one member who is a full-time employee of a local business.

The Town of Truckee takes a unique approach to the issue of workforce housing, while also recognizing the demand for tourist accommodations as a resort town. The Town uses a Short-Term Rental Workforce Housing Token program to incentivize workforce housing. Property owners that make units available for rental for workforce housing may receive a “token” in the form of a Transient Lodging Certificate, which can then be used for short-term rental activity in one unit. The Town also implemented the Workforce Rental Grant Program to incentivize property owners to rent long-term to local workers. Participating property owners receive grants ranging from \$1,000 to \$10,000 and free tenant-matching services. Mammoth Lakes also hosts a workforce renter matching program, in addition to a number of initiatives under their Housing Now! Program such as the Bridge program, which purchases market rate homes that are then deed-restricted and sold to qualifying participants at a subsidized rate.



## PART 4

# ECONOMIC ANALYSIS

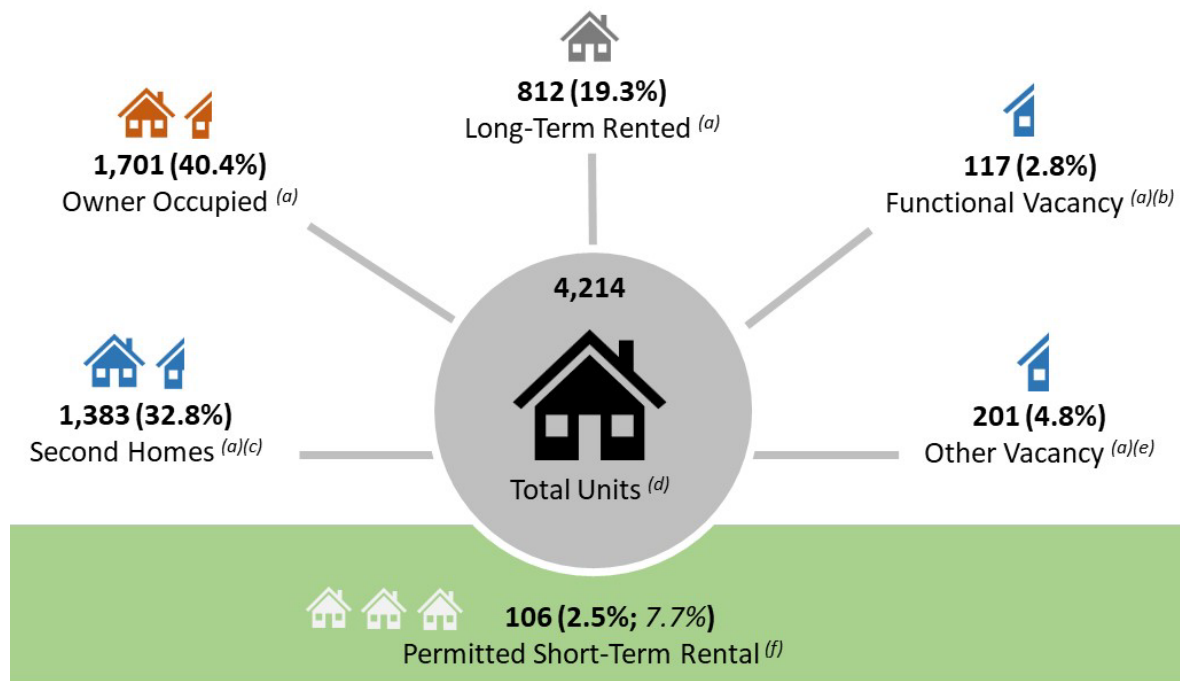
### HOUSING MARKET CONDITIONS AND TRENDS

The following section summarizes recent conditions and trends in the Mono County housing market. The analysis is primarily focused on the unincorporated county as a whole, though additional detail is provided where possible for the County Planning Areas and other related geographies.

#### *HOUSING STOCK UTILIZATION*

**Figure 2** illustrates the estimated distribution of the Mono County housing stock by use. The figure leverages the housing unit total provided by the California Department of Finance (DOF) for 2023 and the distribution of housing units by occupancy status from the 2020 Decennial Census. According to these estimates, nearly 60 percent of the unincorporated Mono County housing stock was occupied full-time. Of the housing units in the unincorporated area that were occupied full-time, roughly one-third were rented, and the remainder were owner occupied. Around 40 percent of the unincorporated area housing stock was vacant, with more than 80 percent of the vacant housing stock being vacant for seasonal and occasional use (i.e., second homes). Mono County reports that there were 106 registered STRs in the unincorporated county as of December 2023. These units represent only around 2.4 percent of the total housing stock or 7.7 percent of the housing stock held vacant for seasonal and occasional use. By comparison, STRs in the Town of Mammoth Lakes account for an estimated 35.6 percent of the housing stock.

**Figure 2. Housing Stock Utilization, 2023 est.**



Note:

(a) Based on the distribution of vacant housing units by type as reported in the 2020 Decennial Census, multiplied by the total number of housing units, as reported by the California Department of Finance for 2023.

(b) Includes units that are vacant as a result of being available for rent and for-sale.

(c) Includes units that are held vacant for seasonal and occasional use.

(d) As reported by the California Department of Finance for 2023.

(e) Includes units that are rented or sold, but not yet reoccupied, as well as units held vacant for migrant workers, and units that fall into the Census Bureau's "other vacant" definition.

(f) As reported by Mono County as of December 2023.

Source: U.S. Census Bureau, 2020 Decennial Census; California Department of Finance, Mono County; BAE, June 2023.

## HOUSING VACANCY CHARACTERISTICS

**Table 8** reports the distribution of housing units in the Town of Mammoth Lakes and unincorporated Mono County by occupancy and vacancy status, as reported by the 2010 and 2020 Decennial Census. According to this data, there were 4,259 total housing units in unincorporated Mono County in 2020, which represents a loss of 27 housing units (roughly 0.6 percent) since 2010. DOF estimates that between 2020 and 2023, the unincorporated area housing stock contracted further to 4,214 units, which represents a loss of another 45 units (roughly 1.1 percent). DOF estimates that housing vacancy decreased by four tenths of a percent between 2010 and 2020, then increased by around one tenth of a percent to an average of 40.4 percent as of January 2023.

**Table 7. Housing Occupancy and Vacancy Status, 2010 and 2020**

	2010		2020		Change 2010-2020	
	Number	Percent	Number	Percent	Number	Percent
<b>Town of Mammoth Lakes</b>						
<b>Occupied units</b>	<b>3,229</b>	<b>33.5%</b>	<b>2,934</b>	<b>31.4%</b>	<b>(295)</b>	<b>-9.1%</b>
Owner-Occupied	1,502	15.6%	1,398	15.0%	(104)	-6.9%
Renter-Occupied	1,727	17.9%	1,536	16.5%	(191)	-11.1%
<b>Vacant units</b>	<b>6,397</b>	<b>66.5%</b>	<b>6,396</b>	<b>68.6%</b>	<b>(1)</b>	<b>0.0%</b>
For rent	1,016	10.6%	487	5.2%	(529)	-52.1%
For sale only	54	0.6%	31	0.3%	(23)	-42.6%
Rented, not occupied	278	2.9%	130	1.4%	(148)	-53.2%
Sold, not occupied	11	0.1%	177	1.9%	166	1509.1%
For seasonal, rec, or occasional use	4,981	51.7%	5,511	59.1%	530	10.6%
For migrant workers	4	0.0%	4	0.0%	0	0.0%
Other vacant	53	0.6%	56	0.6%	3	5.7%
<b>Total Units</b>	<b>9,626</b>	<b>100%</b>	<b>9,330</b>	<b>100%</b>	<b>(296)</b>	<b>-3.1%</b>
	2010		2020		Change 2010-2020	
	Number	Percent	Number	Percent	Number	Percent
<b>Unincorporated County</b>						
<b>Occupied units</b>	<b>2,539</b>	<b>59.2%</b>	<b>2,540</b>	<b>59.6%</b>	<b>1</b>	<b>0.0%</b>
Owner-Occupied	1,726	40.3%	1,719	40.4%	(7)	-0.4%
Renter-Occupied	813	19.0%	821	19.3%	8	1.0%
<b>Vacant units</b>	<b>1,747</b>	<b>40.8%</b>	<b>1,719</b>	<b>40.4%</b>	<b>(28)</b>	<b>-1.6%</b>
For rent	109	2.5%	80	1.9%	(29)	-26.6%
For sale only	64	1.5%	38	0.9%	(26)	-40.6%
Rented, not occupied	11	0.3%	20	0.5%	9	81.8%
Sold, not occupied	9	0.2%	28	0.7%	19	211.1%
For seasonal, rec, or occasional use	1,402	32.7%	1,398	32.8%	(4)	-0.3%
For migrant workers	17	0.4%	16	0.4%	(1)	-5.9%
Other vacant	135	3.1%	139	3.3%	4	3.0%
<b>Total Units</b>	<b>4,286</b>	<b>100%</b>	<b>4,259</b>	<b>100%</b>	<b>(27)</b>	<b>-1.0%</b>

Sources: U.S. Census Bureau, Decennial Census 2010 and 2020; BAE, 2023.

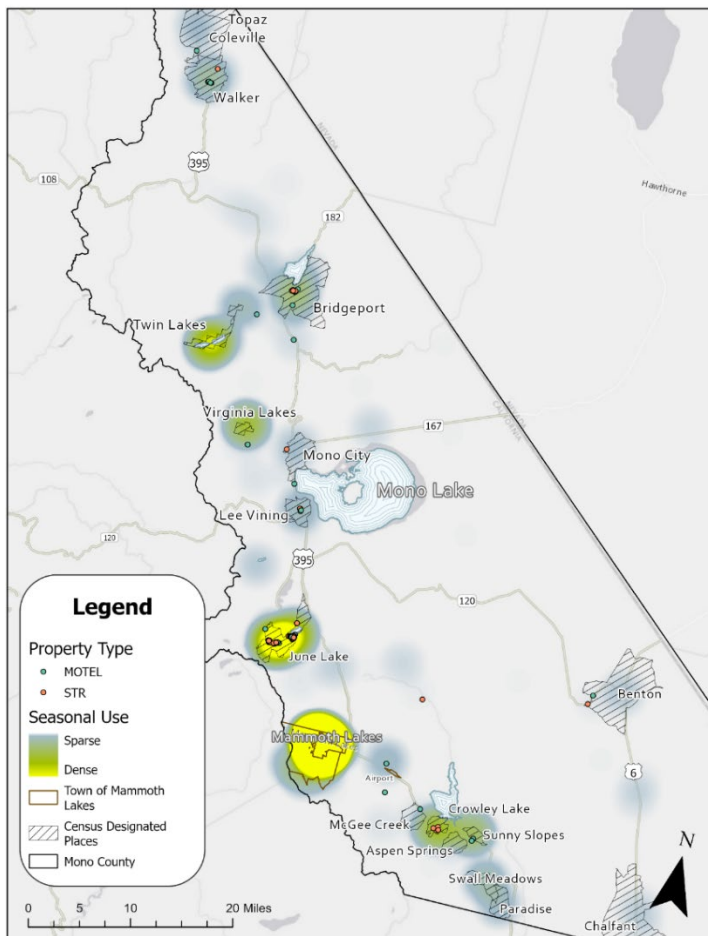
## FUNCTIONAL VACANCY

The table further shows that the unincorporated area experienced a decrease in the number of housing units that were available for rent or for sale over the decade, though notably the total number of renter-occupied housing units increased slightly. Comparison between the number of housing units available for rent and the total number of rental units suggests a functional vacancy rate of 8.7 percent, which may be exaggerated due to pandemic induced closures that occurred in 2020. The functional vacancy rate in the for-sale market was likely closer to 2.1 percent as of 2020.

## SEASONAL VACANCY

Over the decade, the data indicate that the total number of seasonally occupied housing units decreased slightly (i.e., four units) within the unincorporated area, though the share of the housing stock held for seasonal or occasional use remained roughly constant. Nonetheless, seasonal vacancy varies widely throughout Mono County, with some communities experiencing increases, while others experienced contractions in the number of seasonally vacant units. **Figure 3** illustrates concentrations of seasonal vacant housing in Mono County based on Census Block level data from the 2020 Decennial Census. The figure shows that most of the seasonal vacancy is concentrated in Mammoth Lakes and June Lake, with smaller concentrations in Crowley, Bridgeport (including Twin and Virginia Lakes), and Walker.<sup>5</sup>

**Figure 3: Seasonal Vacancy Heat Map with STRs/Motels, 2020 Decennial Census**



Sources: U.S. Census Bureau, Decennial Census 2020; BAE, 2023.

<sup>5</sup> Seasonal use in the areas of Twin Lakes and Virginia Lakes may be affected by avalanche hazards, and in Virginia Lakes also due seasonal road closures.

**Appendix A** also provides additional information on the occupancy and vacancy status of housing units located within Census Designated Places (CDPs) located within Mono County in 2010 and 2020. The data indicate that Topaz, Crowley Lake, Mono City, Paradise, Chalfant, and Aspen Springs added housing units over the decade, while Coleville, June Lake, Bridgeport, McGee Creek, and Benton lost housing units<sup>6</sup>. The number of full-time occupied housing units also decreased in most of the communities that lost housing units. Seasonal vacancy increased in some communities, while decreasing in others. The communities with the largest increase in seasonal vacancy include Bridgeport (34 units), Crowley Lake (11 units), Lee Vining (10 units), Coleville (9 units), Paradise (9 units), Sunny Slopes (4 units), and Swall Meadows (1 unit). Seasonal vacancy in June Lake, the unincorporated community with the highest concentration of both seasonal vacancy and STRs, remained virtually unchanged over the decade.

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## FOR-SALE HOUSING PRICES

**Table 9** reports characteristics associated with single-family and condominium home sales in unincorporated Mono County from 2019 through November 2023, collected from ListSource, a private data vendor. The data indicates that the volume of single-family home sales remained fairly steady from 2019 through 2021, then decreased somewhat in 2022 and 2023.

Around 90 percent of all home sales in the unincorporated parts of Mono County over the study period were single-family homes. The median single-family home sale price over this period increased by 56 percent, from \$349,000 in 2019 to almost \$580,000 in 2023. Over this period, the median unit size for single family home sales remained fairly stable, suggesting that the observed increase in price is a function of market demand and unit quality, versus differences in unit size. The per square foot sale price for single-family homes also increased by around 46 percent from \$233 per square foot in 2019 to \$342 per square foot in 2023.

The unincorporated area saw similar trends in condominium sales between 2019 and 2023, compared to single-family home sales. Sales volumes remained steady in 2019 through 2021, then dropped somewhat in 2022 and 2023, corresponding with increasing interest rates. The median condominium sale price increased rapidly from \$414,500 in 2019 to \$609,000 in 2023. Notably, the median sale price for condominium units was consistently higher than for single-family homes, which may be due to the concentration of condominium units near Mammoth Lakes, Crowley, and June Lake, but may also be influenced by the County's current regulatory structure pertaining to STRs. The data indicates that while the median condominium sale price increased by 47 percent over this period, the median unit size also increased significantly. This indicates that a portion of the change in the median condominium sale price is likely attributable to differences in unit size. The median price per square foot fluctuated significantly from year to year over this period, which is likely due to significant differences in the attributes of the sold inventory recognizing the very limited condominium sales volumes in unincorporated Mono County.

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<sup>6</sup> While the reason for loss of housing units has not been captured in this data, it should be noted that the Mountain View fire of 2020 affected structures in the Coleville and Walker area.

**Table 8. Home Sales Characteristics by Unit Type, Unincorporated Mono County, 2019 Through November 2023**

<b>Single-Family Residences</b>					
<b>Sale Price Range</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>YTD 2023</b>
Less than \$150,000	15	3	5	2	5
\$150,000-\$249,999	12	10	12	4	3
\$250,000-\$349,999	15	15	9	8	6
\$350,000-\$449,999	11	21	11	7	5
\$450,000-\$549,999	9	11	6	6	6
\$550,000-\$649,999	11	10	7	16	9
\$650,000-\$749,999	2	7	6	4	7
\$750,000-\$849,999	5	3	13	6	8
\$850,000 or more	2	11	12	14	6
<b>Total, SFR Sales</b>	<b>82</b>	<b>91</b>	<b>81</b>	<b>67</b>	<b>55</b>
<i>% of Total</i>	89%	89%	87%	91%	92%
<b>Median Sale Price</b>	\$349,000	\$410,000	\$504,500	\$597,500	\$579,000
<b>Average Sale Price</b>	\$376,176	\$498,341	\$545,288	\$637,826	\$562,191
<b>Maximum Sale Price</b>	\$1,000,000	\$1,350,000	\$1,287,500	\$1,782,000	\$1,460,000
<b>Minimum Sale Price</b>	\$45,000	\$80,000	\$50,000	\$99,000	\$52,000
<b>Median Price per sq. ft.</b>	\$233	\$286	\$321	\$346	\$342
<b>Median Living Area (sq. ft.)</b>	1,620	1,718	1,746	1,855	1,678
<b>Condominium</b>					
<b>Sale Price Range</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>YTD 2023</b>
Less than \$150,000	0	0	0	0	0
\$150,000-\$249,999	0	1	0	0	0
\$250,000-\$349,999	3	0	0	0	0
\$350,000-\$449,999	3	3	5	2	0
\$450,000-\$549,999	3	6	5	0	0
\$550,000-\$649,999	1	1	0	0	3
\$650,000-\$749,999	0	0	2	2	2
\$750,000-\$849,999	0	0	0	3	0
\$850,000 or more	0	0	0	0	0
<b>Total, Condominium Sales</b>	<b>10</b>	<b>11</b>	<b>12</b>	<b>7</b>	<b>5</b>
<i>% of Total</i>	11%	11%	13%	9%	8%
<b>Median Sale Price</b>	\$414,500	\$450,000	\$494,500	\$690,000	\$609,000
<b>Average Sale Price</b>	\$430,150	\$454,545	\$499,833	\$642,429	\$626,800
<b>Maximum Sale Price</b>	\$600,000	\$640,000	\$699,000	\$820,000	\$674,000
<b>Minimum Sale Price</b>	\$319,500	\$240,000	\$389,000	\$350,000	\$590,000
<b>Median Price per sq. ft.</b>	\$481	\$576	\$393	\$549	\$479
<b>Median Living Area (sq. ft.)</b>	1,029	813	1,004	1,250	1,232

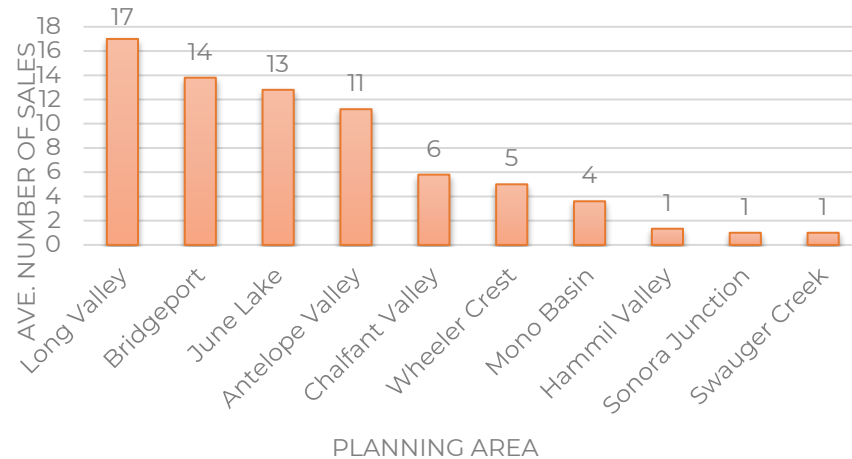
Note:

(a) Data reflects single-family and condominium sold between January and November 2023.

Sources: ListSource; BAE, 2023.

## SINGLE FAMILY HOME SALES VOLUMES BY PLANNING AREA, PRICE

**Figure 4: Average Annual Single-Family Home Sales Volumes by Planning Area, 2019 Through November 2023**



Notes:

(a) There were no reported single-family home sales in the Benton, Benton Hot Springs, Bodie Hills, Mammoth Vicinity, Oasis, and Upper Owens Planning Areas. Sources: ListSource; BAE, 2023.

**Figure 4** illustrates the average number of single-family home sales that occurred per year between 2019 and November 2023 by County Planning Area. According to this data, the Long Valley, Bridgeport, June Lake, and Antelope Valley Planning Areas had the highest numbers of single-family home sales at between 10 and 20 sales per year. The remaining planning areas show an average of around five or fewer sales per year.

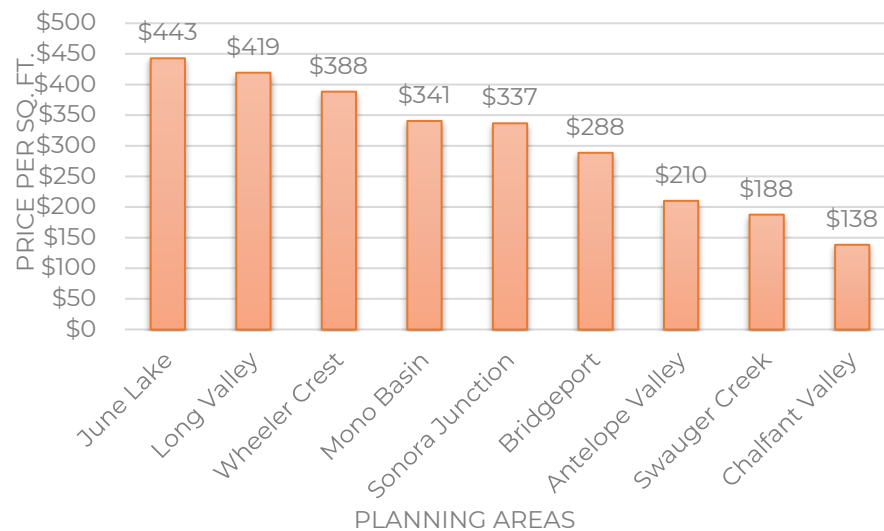
**Figure 5: Median Single-Family Home Sale Price by Planning Area, \$,000, January to November 2023**



Sources: ListSource; BAE, 2023.

**Figures 4 and 5** illustrate the median single-family sale price and price per square foot by County Planning Area. The data indicate that in gross terms, the County Planning Areas with the highest median single-family home prices in 2023 (January through November) include Wheeler Crest, Long Valley, June Lake, and Swauger Creek. The areas with the lowest median sale prices were Antelope Valley and Chalfant Valley.

**Figure 5: Median Per Square Foot Single-Family Sale Price by Planning Area, January to November 2023**



Notes:

(a) There were no reported single-family home sales in the Benton, Benton Hot Springs, Bodie Hills, Hammil Valley, Mammoth Vicinity, Oasis, and Upper Owens Planning Areas. Sources: ListSource; BAE, 2023.

On a price per square foot basis, the area with the highest average median price was June Lake, with a median price of \$443 per square foot in 2023, followed by Long Valley at \$419 per square foot. Units sold in Wheeler Crest and the Mono Basin had per square foot prices in the mid- to high-\$300s, while Bridgeport and Antelope Valley had prices in the \$200 to \$300 range. Units in Swauger Creek and Chalfant were priced at under \$200 per square foot of living area.

## CONDOMINIUM SALES BY PLANNING AREA

**Table 10**, on the following page, reports the pricing of condominium sales by Planning Area, between 2019 and November 2023. According to this data, condominium sales occurred in only three Planning Areas, including June Lake, Long Valley, and the Mammoth Vicinity. Each area saw between three and four sales per year on average, with the Mammoth Vicinity showing the highest single year sales total at eight units in 2020. As of 2023, the median gross sale price for condominium units was fairly similar across all three areas, though the median sale price per square foot varied significantly.



Units in the Mammoth Vicinity, which includes the Crowley area, had the highest median per square foot sale price at more than \$1,000 a square foot, compared to \$479 in June Lake and \$381 in Long Valley. Although prices fluctuate from year-to-year, all three areas saw notable price appreciation over the study period. For example, the median per square foot sale price increased by 108 percent in Long Valley, 72 percent in the Mammoth Vicinity, and 47 percent in June Lake.

**Table 9. Condominium Sales Trends by Planning Area, 2019 to November 2023**

<b>June Lake Planning Area</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>
Number of Sales	3	1	n.a.	5	1
Median Sale Price	\$408,000	\$450,000	n.a.	\$673,000	\$590,000
Median Price Per Sq. Ft.	\$325	\$266	n.a.	\$430	\$479
Median Sq. Ft.	1,256	1,689	n.a.	1,256	1,232
<b>Long Valley Planning Area</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>
Number of Sales	2	2	7	n.a.	2
Median Sale Price	\$319,750	\$418,000	\$500,000	n.a.	\$667,000
Median Price Per Sq. Ft.	\$183	\$238	\$311	n.a.	\$381
Median Sq. Ft.	1,755	1,755	\$1,611	n.a.	1,755
<b>Mammoth Vicinity Planning Area</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>
Number of Sales	5	8	5	2	2
Median Sale Price	\$488,000	\$487,500	\$445,000	\$815,000	\$605,000
Median Price Per Sq. Ft.	\$630	\$629	\$795	\$971	\$1,080
Median Sq. Ft.	813	813	560	840	560

Notes:

(a) There were no reported condominium sales in the Antelope Valley, Bridgeport, Chalfant Valley, Hammil Valley, Mono Basin, Sonora Junction, Sauger Creek, and the Wheeler Crest Planning Areas.

(b) There were no reported home sales, either condominium or single-family, in the Benton, Benton Hot Springs, Bodie Hills, Oasis, and Upper Owens Planning Areas. Sources: ListSource; BAE, 2023.

## AFFORDABLE HOME PURCHASE PRICE

**Table 11**, on the following pages, reports home purchase prices that can be considered affordable based on standard mortgage lending assumptions and data provided by the California Department of Housing and Community Development (HCD). Assuming a 20 percent downpayment and an interest rate of 6.8 percent, the estimated income needed to afford a median priced housing unit, either single-family or condominium, priced around \$600,000 would be approximately \$150,000 per year, which is equal to around 175 percent of the area median family income (MFI) as estimated by HCD. Notably, at this pricing level, a median priced housing unit would fall under the 2023 conforming loan limits for Mono County.

The calculations reported in the table assume a 20 percent downpayment, which would require the purchaser to provide \$120,000 up front. This is likely to be a challenge for many workforce households. Decreasing the downpayment amount to five percent of the purchase price would decrease the downpayment requirement to only \$30,000, but would increase the monthly payment to nearly \$4,396, which would require an income of roughly \$175,000 per year, or 183 percent of the area MFI. Downpayment assistance programs are available, though many are associated with State and Federal funding sources which can have strict eligibility requirements that often preclude middle-income households from participating.

Table 10. Affordable For-Sale Housing Prices, Mono County, 2023 (Page 1 of 2)

2023 Income Limits (a)	Persons Per Household							
	One	Two	Three	Four	Five			
Acutely Low -Income (15% MFI)	\$10,050	\$11,500	\$12,900	\$14,350	\$15,500			
Extremely Low -Income (30% MFI)	\$17,850	\$20,400	\$24,860	\$30,000	\$35,140			
Very Low -Income (50% MFI)	\$29,750	\$34,000	\$38,250	\$42,500	\$45,900			
Low -Income (80% MFI)	\$47,600	\$54,400	\$61,200	\$68,000	\$73,450			
<b>Median Income (100% MFI)</b>	<b>\$67,050</b>	<b>\$76,650</b>	<b>\$86,200</b>	<b>\$95,800</b>	<b>\$103,450</b>			
Moderate-Income (120% MFI)	\$80,450	\$91,950	\$103,450	\$114,950	\$124,150			
Achievable (175% MFI)(b)	\$117,338	\$134,138	\$150,850	\$167,650	\$181,038			

1-Person Household	Amount Avail. for Housing	Principal & Interest	Property Insurance	Property Taxes	Mortgage Insurance	Total Monthly Payment	Down- Payment	Affordable Home Price
Acutely Low -Income (15% MFI)	\$251	\$206	\$9	\$36	\$0	\$251	\$7,907	\$39,534
Extremely Low -Income (30% MFI)	\$446	\$366	\$15	\$64	\$0	\$446	\$14,050	\$70,248
Very Low -Income (50% MFI)	\$744	\$611	\$25	\$107	\$0	\$744	\$23,437	\$117,184
Low -Income (80% MFI)	\$1,190	\$978	\$41	\$172	\$0	\$1,190	\$37,486	\$187,432
Moderate-Income (120% MFI)	\$2,011	\$1,652	\$69	\$290	\$0	\$2,011	\$63,349	\$316,744
Achievable (175% MFI)	\$2,933	\$2,409	\$100	\$423	\$0	\$2,933	\$92,393	\$461,964

2-Person Household	Amount Avail. for Housing	Principal & Interest	Property Insurance	Property Taxes	Mortgage Insurance	Total Monthly Payment	Down- Payment	Affordable Home Price
Acutely Low -Income (15% MFI)	\$288	\$237	\$10	\$42	\$0	\$288	\$9,072	\$45,362
Extremely Low -Income (30% MFI)	\$510	\$419	\$17	\$74	\$0	\$510	\$16,066	\$80,328
Very Low -Income (50% MFI)	\$850	\$698	\$29	\$123	\$0	\$850	\$26,776	\$133,880
Low -Income (80% MFI)	\$1,360	\$1,117	\$46	\$196	\$0	\$1,360	\$42,842	\$214,208
Moderate-Income (120% MFI)	\$2,299	\$1,889	\$79	\$332	\$0	\$2,299	\$72,421	\$362,106
Achievable (175% MFI)	\$3,353	\$2,754	\$115	\$484	\$0	\$3,353	\$105,623	\$528,117

3-Person Household	Amount Avail. for Housing	Principal & Interest	Property Insurance	Property Taxes	Mortgage Insurance	Total Monthly Payment	Down- Payment	Affordable Home Price
Acutely Low -Income (15% MFI)	\$323	\$265	\$11	\$47	\$0	\$323	\$10,175	\$50,874
Extremely Low -Income (30% MFI)	\$622	\$511	\$21	\$90	\$0	\$622	\$19,594	\$97,969
Very Low -Income (50% MFI)	\$956	\$785	\$33	\$138	\$0	\$956	\$30,115	\$150,576
Low -Income (80% MFI)	\$1,530	\$1,257	\$52	\$221	\$0	\$1,530	\$48,197	\$240,984
Moderate-Income (120% MFI)	\$2,586	\$2,124	\$88	\$373	\$0	\$2,586	\$81,462	\$407,310
Achievable (175% MFI)	\$3,771	\$3,098	\$129	\$544	\$0	\$3,771	\$118,791	\$593,954

Sources: HCD; California Department of Insurance, Homeowners Premium Survey; Mono County; BAE, 2023.

**Table 11: Affordable For-Sale Housing Prices, Mono County, 2023 (Page 2 of 2)**

4-Person Household	Amount Avail. for Housing	Principal & Interest	Property Insurance	Property Taxes	Mortgage Insurance	Total Monthly Payment	Down- Payment	Affordable Home Price
Acutely Low -Income (15% MFI)	\$359	\$295	\$12	\$52	\$0	\$359	\$11,309	\$56,545
Extremely Low -Income (30% MFI)	\$750	\$616	\$26	\$108	\$0	\$750	\$23,626	\$118,129
Very Low -Income (50% MFI)	\$1,063	\$873	\$36	\$153	\$0	\$1,063	\$33,486	\$167,429
Low -Income (80% MFI)	\$1,700	\$1,396	\$58	\$245	\$0	\$1,700	\$53,552	\$267,760
Moderate-Income (120% MFI)	\$2,874	\$2,361	\$98	\$415	\$0	\$2,874	\$90,534	\$452,672
Achievable (175% MFI)	\$4,191	\$3,443	\$143	\$605	\$0	\$4,191	\$132,021	\$660,107
5-Person Household	Amount Avail. for Housing	Principal & Interest	Property Insurance	Property Taxes	Mortgage Insurance	Total Monthly Payment	Down- Payment	Affordable Home Price
Acutely Low -Income (15% MFI)	\$388	\$319	\$13	\$56	\$0	\$388	\$12,222	\$61,112
Extremely Low -Income (30% MFI)	\$879	\$722	\$30	\$127	\$0	\$879	\$27,690	\$138,448
Very Low -Income (50% MFI)	\$1,148	\$943	\$39	\$166	\$0	\$1,148	\$36,163	\$180,817
Low -Income (80% MFI)	\$1,836	\$1,508	\$63	\$265	\$0	\$1,836	\$57,836	\$289,181
Moderate-Income (120% MFI)	\$3,104	\$2,550	\$106	\$448	\$0	\$3,104	\$97,780	\$488,898
Achievable (175% MFI)	\$4,526	\$3,718	\$155	\$653	\$0	\$4,526	\$142,574	\$712,871
Ownership Cost Assumptions								
% of Income for Housing Costs		30% of gross annual income						
Mortgage Terms								
Down payment		20% of home value						
Annual interest rate (b)		6.8% fixed						
Loan term		30 years						
Annual property tax rate (c)		1.10% of home value						
Annual homeowners insurance (d)		0.26% of home value						

**Notes:**

(a) Income limits are based on the CA Department of Housing and Community Development-adjusted median family income of \$95,800 (\$2023).

(b) Based on an average interest rate in November 2023.

(c) Based on the tax rate area 051-027.

(d) Based on an average of quoted insurance premiums from the Homeowners Premium Survey, published by the California Department of Insurance, for a new home in Mono County near Mammoth Lakes, valued at \$700,000 with a \$1,000 annual deductible.

Sources: HCD; California Department of Insurance, Homeowners Premium Survey; Mono County; BAE, 2023.

Homeowners' association (HOA) dues and special assessments are also an important factor in the relative affordability of multi-family condominium units. According to local property managers and HOA representatives, typical HOA dues can range from \$400 to \$650 per month. Also, as many of the condominium properties in Mono County are quite old, many condominium property owners are subject to additional special assessments that were imposed to help cover costs associated with significant repairs, such as roof replacements, that were not fully covered by the association's replacement reserve. HOA dues and special assessments can vary significantly between properties and by unit size, and also can also change dramatically from year to year based on the property's needs. These charges can significantly impact the relative affordability of condominium units to workforce households.

## RENTAL HOUSING PRICES

Based on outreach conducted with area property management companies, BAE identified 23 long-term rental listings in the unincorporated county. **Table 12** reports that on average private party rental rates ranged from \$1,000 to \$3,000 per month per unit, depending on unit size, with an average cost per bedroom of around \$1,000. The majority of the available listings (17 units) were located in June Lake, with five listings in Crowley and one in Mono City. BAE was unable to locate any long-term rental listings in Bridgeport, Lee Vining, or Walker/Coleville.

**Table 11. Long-Term Rental Listings, Unincorporated Mono County, December 2023**

By Unit Size	Count	Average \$/Month	
		Per Unit	Per Bdrm
Studio	3	\$1,075	\$1,075
One Bedroom	3	\$1,123	\$1,123
Two Bedroom	10	\$2,183	\$1,091
Three Bedroom	7	\$2,971	\$990
<b>All Units</b>	<b>23</b>	<b>\$2,188</b>	<b>\$1,062</b>

By Community	Count	Average \$/Month	
		Per Unit	Per Bdrm
Crowley	5	\$2,320	\$1,000
June Lake	17	\$2,128	\$1,096
Mono City	1	\$2,500	\$833
<b>All Units</b>	<b>23</b>	<b>\$2,188</b>	<b>\$1,062</b>

Sources: Local Area Property Managers; BAE, 2023.

## AFFORDABLE RENTAL RATES

**Table 13**, on the following page, reports the rental rates that may reasonably be considered affordable at different income levels. Compared to the data provided in Table 12, the average long-term rental in unincorporated Mono County could be considered affordable to low- and moderate-income households depending on household size. Note, however, that while housing may be relatively affordable, this data does not speak to its relative availability.

**Table 12. Affordable Long-Term Rental Rates, Mono County, 2023**

<b>2023 Income Limits (a)</b>	<b>Persons Per Household</b>				
	<b>One</b>	<b>Two</b>	<b>Three</b>	<b>Four</b>	<b>Five</b>
Acutely Low -Income (15% MFI)	\$10,050	\$11,500	\$12,900	\$14,350	\$15,500
Extremely Low -Income (30% MFI)	\$17,850	\$20,400	\$24,860	\$30,000	\$35,140
Very Low -Income (50% MFI)	\$29,750	\$34,000	\$38,250	\$42,500	\$45,900
Low -Income (80% MFI)	\$47,600	\$54,400	\$61,200	\$68,000	\$73,450
<b>Median Income (100% MFI)</b>	<b>\$67,050</b>	<b>\$76,650</b>	<b>\$86,200</b>	<b>\$95,800</b>	<b>\$103,450</b>
Moderate-Income (120% MFI)	\$80,450	\$91,950	\$103,450	\$114,950	\$124,150

<b>Affordable Rents (b)</b>	<b>Unit Size</b>				
	<b>Studio</b>	<b>1-Bedroom</b>	<b>2-Bedroom</b>	<b>3-Bedroom</b>	<b>4-Bedroom</b>
<b>Acutely Low Income</b>					
1-Person	\$110	\$87			
2-Person		\$124	\$77		
3-Person			\$112	\$67	
4-Person			\$148	\$103	\$52
5-Person				\$132	\$81
<b>Extremely Low Income</b>					
1-Person	\$305	\$282			
2-Person		\$346	\$299		
3-Person			\$411	\$366	
4-Person			\$539	\$494	\$443
5-Person				\$623	\$572
<b>Very Low Income</b>					
1-Person	\$603	\$580			
2-Person		\$686	\$639		
3-Person			\$745	\$700	
4-Person			\$852	\$807	\$756
5-Person				\$892	\$841
<b>Low</b>					
1-Person	\$1,049	\$1,026			
2-Person		\$1,196	\$1,149		
3-Person			\$1,319	\$1,274	
4-Person			\$1,489	\$1,444	\$1,393
5-Person				\$1,580	\$1,529
<b>Moderate</b>					
1-Person	\$1,870	\$1,847			
2-Person		\$2,135	\$2,088		
3-Person			\$2,375	\$2,330	
4-Person			\$2,663	\$2,618	\$2,567
5-Person				\$2,848	\$2,797

**Notes:**

(a) Income limits are based on the CA Department of Housing and Community Development-adjusted median family income of \$95,800 (\$2023).

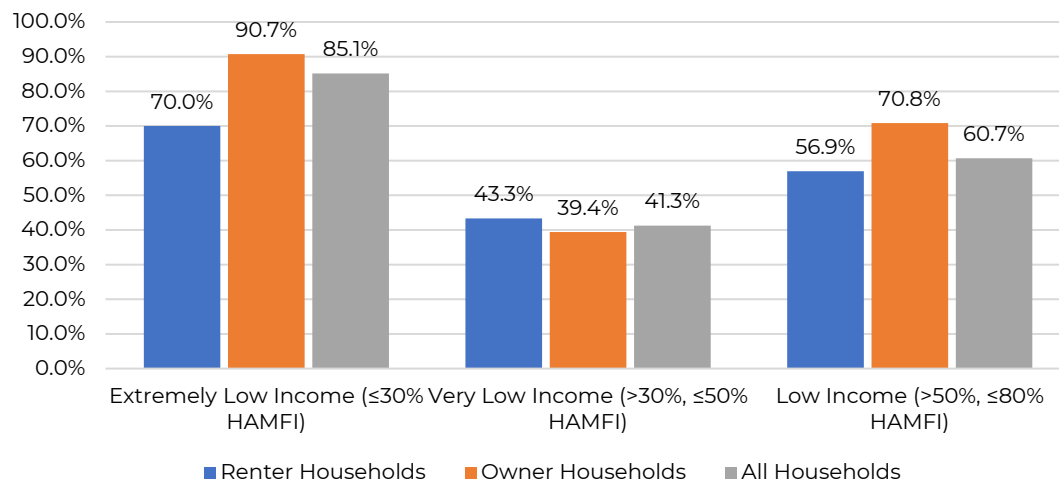
(b) Affordable rents equal to 30 percent of gross monthly income, minus a utility allowance. The utility allowance is published by Stanislaus Regional Housing Authority (as referred to by Eastern Sierra Community Housing) in 2023. Utility allowances assume that all heating, cooking, and water heating would be done using natural gas. Other electricity usage is also included, accounting for lighting, refrigeration, and small appliances.

Sources: CA Department of Housing and Community Development; Eastern Sierra Community Housing and Stanislaus Regional Housing Authority; BAE, 2023.

## HUD DEFINED HOUSING PROBLEMS

Although long-term rental rates appear to be relatively affordable at lower- and moderate-income levels, data published by the U.S. Department of Housing and Urban Development (HUD) indicate that one-third of all households in Mono County experienced at least one of the four HUD defined housing problems between 2016 and 2020. HUD defined housing problems include overpayment, overcrowding, and/or inadequate kitchen or bathroom facilities. Given the community's reliance on service sector employment, overpayment represents the most common of the four HUD defined housing problems. While the prevalence of housing problems typically shows an inverse relationship to income, the data indicate that very low-income households have a reduced prevalence of housing problems compared to extremely low- and low-income households, though the prevalence is still greater than in the broader population when including higher income households. The presence of income restricted housing projects in Mammoth Lakes, which is captured in the countywide data, may account for this relationship.

**Figure 6: Housing Problems by Income and Tenure, Mono County, 2016-2020**



**Notes:**

(a) CHAS data reflect HUD-defined household income limits. HAMFI stands for HUD Area Median Family Income.

Sources: U.S. Department of Housing and Urban Development, 2016-2020 Comprehensive Housing Affordability Strategy (CHAS) data; BAE, 2023.

**Table 13. Housing Problems by Income and Tenure, Mono County, 2016-2020**

<b>Household Income Brackets (a)</b>	<b>Renter Households</b>		<b>Owner Households</b>		<b>All Households</b>	
	Number	Percent	Number	Percent	Number	Percent
<b>Household Income ≤30% HAMFI (b)</b>	<b>100</b>	<b>100.0%</b>	<b>310</b>	<b>100.0%</b>	<b>410</b>	<b>100.0%</b>
1 or more of 4 Housing Problem	70	70.0%	245	90.7%	315	85.1%
1 or more of 4 Severe Housing Problems (d)	70	70.0%	245	90.7%	315	85.1%
No Housing Problems	30	30.0%	25	9.3%	55	14.9%
<b>Household Income &gt;30% to ≤50% HAMFI (b)</b>	<b>150</b>	<b>100.0%</b>	<b>165</b>	<b>100.0%</b>	<b>315</b>	<b>100.0%</b>
1 or more of 4 Housing Problems (c)	65	43.3%	65	39.4%	130	41.3%
1 or more of 4 Severe Housing Problems (d)	40	26.7%	40	24.2%	80	25.4%
Has none of 4 Housing Problems	85	56.7%	100	60.6%	185	58.7%
<b>Household Income &gt;50% to ≤80% HAMFI (b)</b>	<b>325</b>	<b>100.0%</b>	<b>120</b>	<b>100.0%</b>	<b>445</b>	<b>100.0%</b>
1 or more of 4 Housing Problems (c)	185	56.9%	85	70.8%	270	60.7%
1 or more of 4 Severe Housing Problems (d)	55	16.9%	45	37.5%	100	22.5%
Has none of 4 Housing Problems	140	43.1%	35	29.2%	175	39.3%
<b>Household Income &gt;80% to ≤100% HAMFI (b)</b>	<b>335</b>	<b>100.0%</b>	<b>735</b>	<b>100.0%</b>	<b>1,070</b>	<b>100.0%</b>
1 or more of 4 Housing Problems (c)	145	43.3%	355	48.3%	500	46.7%
1 or more of 4 Severe Housing Problems (d)	0	0.0%	315	42.9%	315	29.4%
Has none of 4 Housing Problems	190	56.7%	380	51.7%	570	53.3%
<b>Household Income &gt;100% HAMFI (b)</b>	<b>750</b>	<b>100.0%</b>	<b>2,210</b>	<b>100.0%</b>	<b>2,960</b>	<b>100.0%</b>
1 or more of 4 Housing Problems (c)	115	15.3%	660	29.9%	775	26.2%
1 or more of 4 Severe Housing Problems (d)	0	0.0%	45	2.0%	45	1.5%
Has none of 4 Housing Problems	635	84.7%	1,550	70.1%	2,185	73.8%
<b>Total Households (b)</b>	<b>1,660</b>	<b>100.0%</b>	<b>3,535</b>	<b>100.0%</b>	<b>5,195</b>	<b>100.0%</b>
1 or more of 4 Housing Problems (c)	580	34.9%	1,445	40.9%	2,025	39.0%
1 or more of 4 Severe Housing Problems (d)	165	9.9%	2,850	80.6%	3,015	58.0%
Has none of 4 Housing Problems	1,080	65.1%	2,090	59.1%	3,170	61.0%

Notes:

(a) CHAS data reflect HUD-defined household income limits. HAMFI stands for HUD Area Median Family Income.

(b) Totals do not equal the sum of individual figures due to independent rounding.

(c) Housing problems include lack of kitchen or plumbing, more than 1 person per room, or cost burden greater than 30%.

(d) Housing problems include lack of kitchen or plumbing, more than 1 person per room, or cost burden greater than 50%.

Sources: U.S. Department of Housing and Urban Development, 2016-2020 Comprehensive Housing Affordability Strategy (CHAS) data; BAE, 2023.

## NEAR-TERM MIGRATION TRENDS

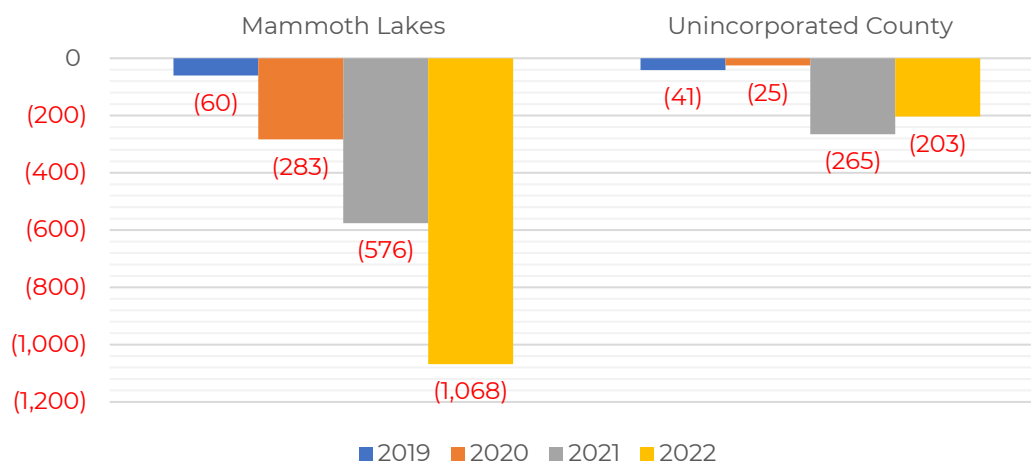
The following section summarizes the available information regarding population and household migration trends, with a focus on the period from 2019 and 2022.

### HOUSEHOLD RELOCATION TRENDS

To provide a more thorough evaluation of recent in- and out-migration patterns in Mono County, BAE collected publicly available data published by the U.S. Postal Service (USPS) regarding change of address requests by ZIP Code. BAE then sorted the data to highlight records for individuals, households, and businesses that filed change of address requests for moves either into, or out of, area ZIP Codes associated with unincorporated Mono County between 2019 and 2022. The data include breakouts for temporary and permanent change of address requests filed by businesses, households, and individuals.

Recognizing the purpose of this analysis, which is to assess pandemic induced population and household change, BAE made the assumption that business change of address requests are most likely associated with permanent moves. Therefore, BAE then subtracted the reported number of business change of address requests from the total number of permanent change of address requests to estimate the total number of permanent residential change of address requests. BAE then subtracted the total number of residential requests for those moving out of the study area ZIP Codes from those moving in to estimate the net change.

**Figure 7: U.S. Postal Service Change of Address Requests for ZIP Codes 93514, 93517, 93529, and 96107**



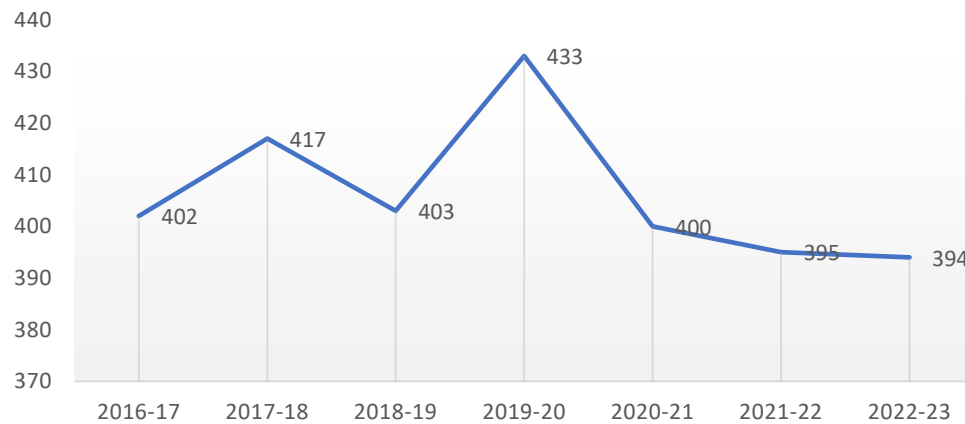
Sources: U.S. Postal Service, National Change of Address; BAE, 2023.

As illustrated in **Figure 7**, unincorporated Mono County experienced a modest outflow of 41 permanent relocations in 2019 and 25 relocations in 2020, which increased to 265 permanent relocations in 2021 and 203 in 2022. While not conclusive, these data support anecdotal evidence of significant outmigration among permanent residents, potentially resulting from decreased housing affordability and availability, among other factors. Similar trends are illustrated in Mammoth Lakes, which experienced increasing permanent outmigration from 2019 through 2022.



## COUNTYWIDE SCHOOL ENROLLMENT

**Figure 8: K-12 School Enrollment, Eastern Sierra Unified School District, 2016-17 to 2022-23**



Sources: California Department of Education, DataQuest, Enrollment Multi-Year Summary by Grade; BAE, 2023.

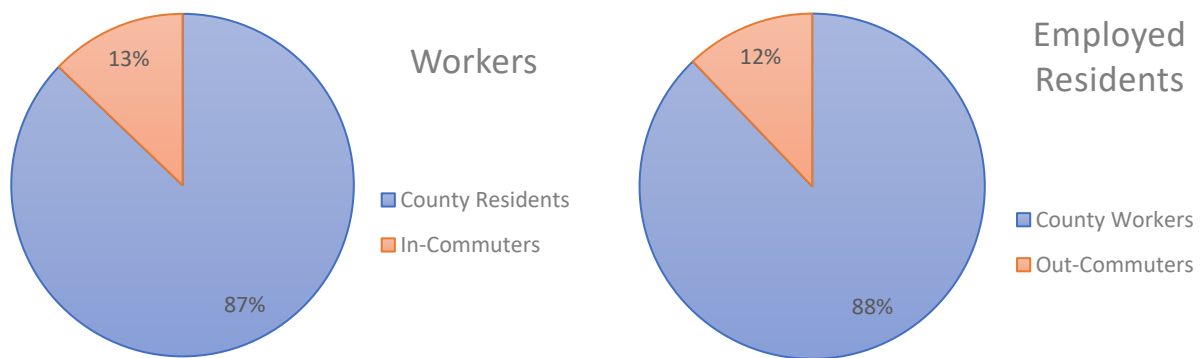
Data collected from the California Department of Education (CDE) indicates that enrollment in the Eastern Sierra Unified School District has largely remained in the low-400s over the last seven academic years. The 2019-2020 academic year featured a notable increase in enrollment from 403 students in the prior year to 433 students in 2019-2020. In 2020-2021, however, enrollment dropped back down to 400 and has continued to decrease slightly to 394 in the 2022-2023 academic year. Where data for the Mammoth Unified School District illustrate an abrupt decrease in enrollment that corresponds with onset of the pandemic, data for the Eastern Sierra Unified School District generally show volatility from year to year, likely due to the relatively low total enrollment numbers, and a very modest near-term drop in enrollment that may or may not have roots in pandemic induced migration trends.

## LABOR FORCE TRENDS

### IN- AND OUT-COMMUTING

Due to its comparatively remote location, communities in Mono County must predominantly rely on the resident labor force to meet workforce needs, versus relying on workers commuting into the community from outside. Data from the 2020 five-year American Community Survey (ACS), the most recent data available, indicate that there were 8,162 persons on average employed in Mono County, with 87 percent also living within the county, and only 13 percent commuting into the county from outside (**Figure 9**). In-commuters primarily originate from the neighboring communities of Inyo County in California and Douglas County in Nevada. By comparison, the County had an average of 8,095 employed residents, again with around 88 percent working within the community and 12 percent commuting out.

**Figure 9: In- and Out-Commuter Rates, Mono County, 2016-2020 ACS**



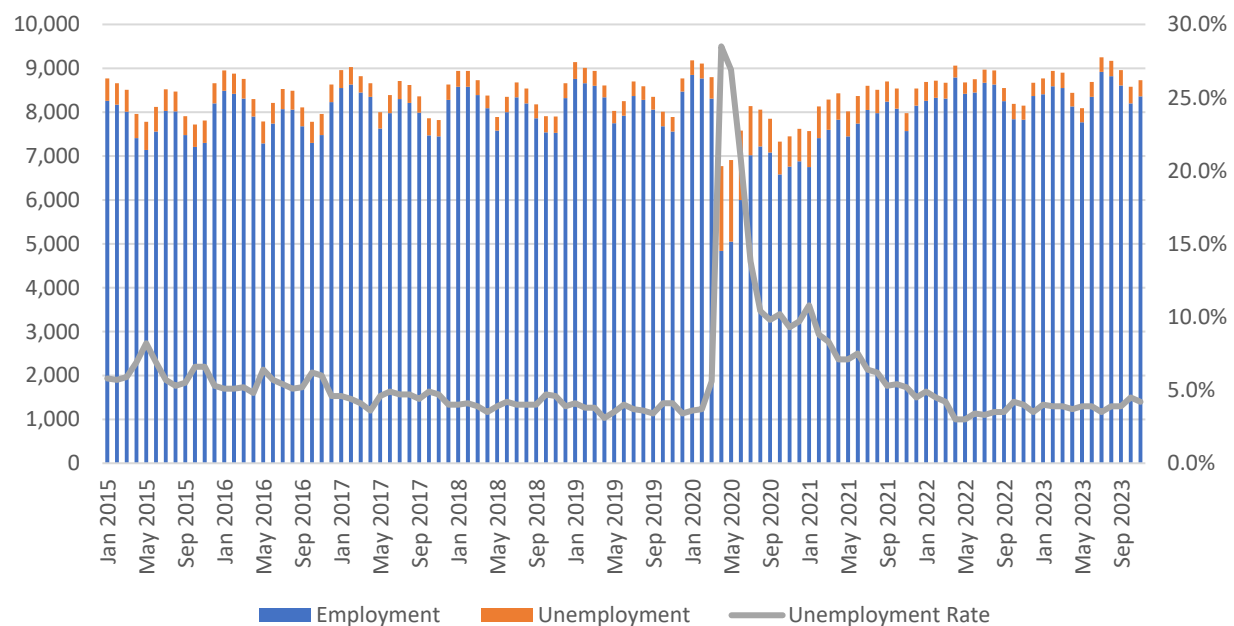
Sources: U.S. Census Bureau, 2016-2020 American Community Survey (ACS); BAE, 2023.

## LABOR FORCE AVAILABILITY

Due to its remote location and increasing cost of living, both the Town of Mammoth Lakes and Mono County have experienced significant declines in labor force availability in recent years.

**Figure 10** illustrates monthly employment and unemployment trends, including the unemployment rate, in Mono County from January 2015 through October 2023. The data indicate that total labor force availability remained relatively stable at around 8,000 workers between 2015 and 2019. Unemployment over this period fluctuated seasonally between three and five percent. Corresponding with the Governor's pandemic-era public health orders issued in early 2020, the number of employed Mono County residents dropped from 8,310 in March 2020 to 4,840 in April, increasing the unemployment rate to a high of 28.5 percent. Though resident employment recovered fairly quickly to 7,020 employed residents in July, the unemployment rate remained between eight and ten percent until March of 2021. Since mid-2021, unemployment has dropped and remained between three and four percent (i.e., 300-400 unemployed persons) for most of 2022 and 2023, which is largely consistent with historical pre-pandemic trends.

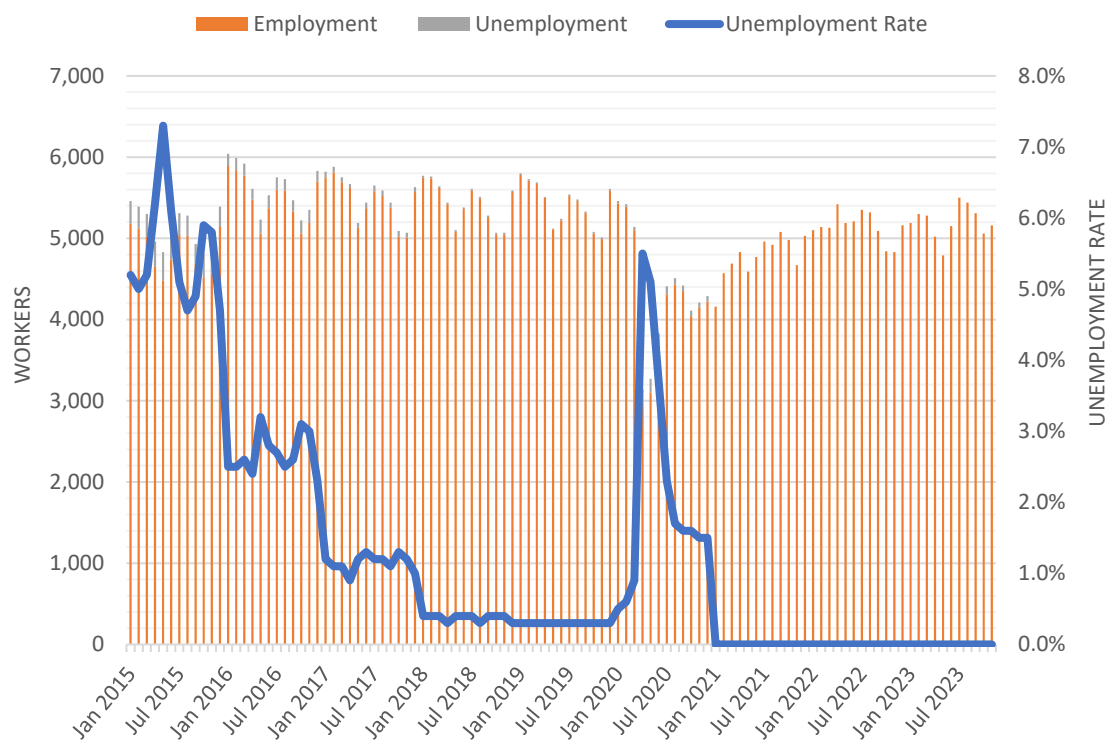
**Figure 10: Employment and Unemployment Trends, Mono County, Jan 2015 through Oct 2023**



Sources: California Employment Development Department (EDD); BAE, 2023.

Unemployment trends within the Town of Mammoth Lakes, however, are notably different. **Figure 11** illustrates similar data for the Town and shows that while the total labor force in the Town remained relatively stable pre-pandemic, unemployment generally trended downwards, reaching a stabilized value of around 0.5 percent in 2018 and 2019. Though the onset of the pandemic induced a short-term spike in the unemployment rate, the EDD reports that the unemployment rate has essentially fallen to zero as of January 2021. If this data is correct, the contraction of the labor force and the decline in the unemployment rate in the Town of Mammoth Lakes implies that businesses in the Town are likely being put in the position of needing to scale back operations due to inadequate labor availability or to increasingly rely on alternative labor force pools (e.g., seasonal and international workers, as well as workers housed within the unincorporated area).

**Figure 11: Employment and Unemployment Trends, Town of Mammoth Lakes, Jan 2015 through Oct 2023**



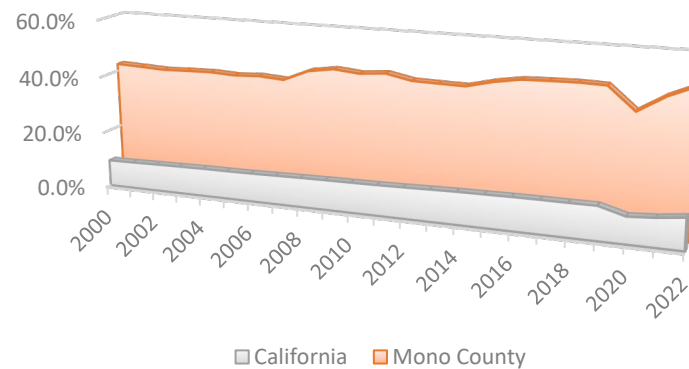
Sources: California Employment Development Department (EDD); BAE, 2023.

## TOURISM ACCOMMODATION INDUSTRY TRENDS

Tourism is an integral part of the Mono County economy.

The following section summarizes trends in the overnight accommodations industry in Mono County. Where reasonably possible, the data is broken out by County subarea.

**Figure 12: Leisure and Hospitality Jobs as a Share of Total Nonfarm Employment, 2000-2022**



Data from the California Employment Development Department (EDD) indicates that the Leisure and Hospitality sector – which includes recreation, accommodations, and food service, among other activities – represents Mono County's single largest employment sector, accounting for nearly half of all jobs. It also represents the only significant growth industry within the county and accounts for an increasing share of countywide employment, as shown in **Figure 12**. Additional data from the Bureau of Economic Analysis indicates that the sector also represents nearly one quarter of countywide gross domestic product, a share that has increased in recent decades.

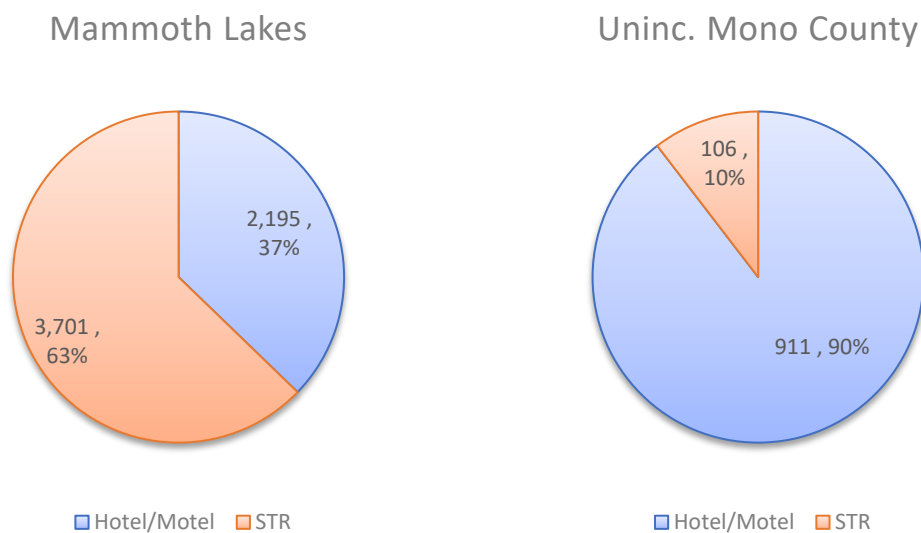
Additional data from Dean Runyan and Associates, which estimates the economic impacts of travel by county for Visit California, indicates that visitors spent \$580.6 million in Mono County in 2022, which supported more than 6,000 jobs directly and indirectly throughout the county.<sup>7</sup> Tourism spending also generated approximately \$44.2 million in local tax receipts.

<sup>7</sup> Direct impacts represent the immediate effects of visitor spending, such as jobs supported at the location where the spending occurred (e.g., restaurants, hotels, etc.). Indirect impacts represent the multiplier effect, where dollars spent at the point of sale are then re-spent on the goods and services needed to operate the point-of-sale business (e.g., restaurant produce, retail products, utilities, etc.).

## TOURIST ACCOMMODATIONS INVENTORY

Due to its remote location, Mono County relies heavily on overnight tourist visitation to support visitor spending and associated economic activity and tax collections. The inventory of tourist accommodations is diversified with various accommodation types (e.g., hotel/motel, tourist cabins, STR, etc.) across a variety of quality levels (e.g., luxury, upscale, midmarket, economy). **Figure 13** illustrates that while the tourist accommodations inventory in the Town of Mammoth Lakes is heavily skewed towards STRs, traditional hotel and motel accommodations make up the majority of the available tourist accommodations inventory in the unincorporated County.

**Figure 13: Tourist Accommodation Units by Type, Town of Mammoth Lakes and Unincorporated Mono County, December 2023**



Sources: Mono County, TOT Certificate and Business License Database; BAE, 2023.

Further analysis of the estimates reported in Figure 13 also indicate that the tourist accommodations inventory in the unincorporated County represents around 14.7 percent of the countywide total. STRs located in the unincorporated county represent around 2.9 percent of the countywide inventory, while the unincorporated area's hotels and motels account for around 41.5 percent of the countywide hotel and motel inventory.

## HOTEL/MOTEL INVENTORY

According to Mono County business license and transient occupancy tax (TOT) certificates data, there are around 50 hotel, motel, bed and breakfast, and tourist cabin establishments located throughout unincorporated Mono County. As summarized in **Table 15**, the County estimates that these properties contain more than 900 hotel/motel rooms and tourist units (e.g., cabins, etc.). The County does not currently have any dedicated hotel projects proposed for development, although a 120-room hotel development in Lee Vining has been approved but not yet constructed. A full inventory of hotel/motel properties is provided in **Appendix B**.

**Table 14. Hotel/Motel Properties and Number of Rooms/Units, Unincorporated Mono County, December 2023**

Community	Hotel/Motel		Hotels as a share of All Tourist Accommodations (b)
	Properties	Rooms/Units (a)	
Benton	1	11	92%
Bridgeport	14	262	98%
Coleville	5	61	98%
Crowley Lake	5	64	97%
Hilton Creek	0	0	0%
June Lake	14	321	78%
Lee Vining	8	154	99%
Mammoth Lakes (Outside Town)	2	38	95%
Topaz	0	0	0%
<b>All, Uninc. County</b>	<b>49</b>	<b>911</b>	<b>90%</b>

Notes:

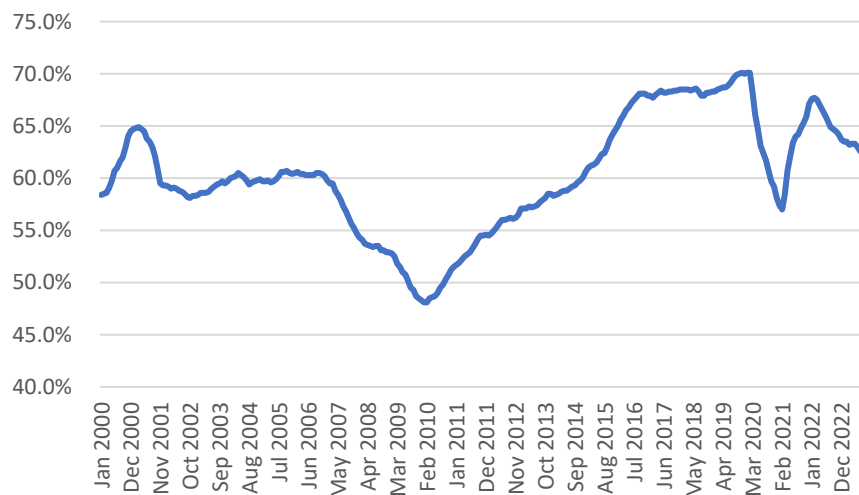
(a) Includes traditional hotel and motel rooms, as well as tourist cabins and other forms of accommodation.

(b) Based on a comparison between the number of hotel/motel rooms/units and the full inventory of tourist accommodations, including both STRs and hotel/motel properties.

Sources: Mono County, TOT Certificate and Business License Database; BAE, 2023.

## HOTEL OCCUPANCY RATES

**Figure 14. 12-Month Average Hotel Occupancy Rate, Unincorporated Mono County, Jan 2000 to Oct 2023**



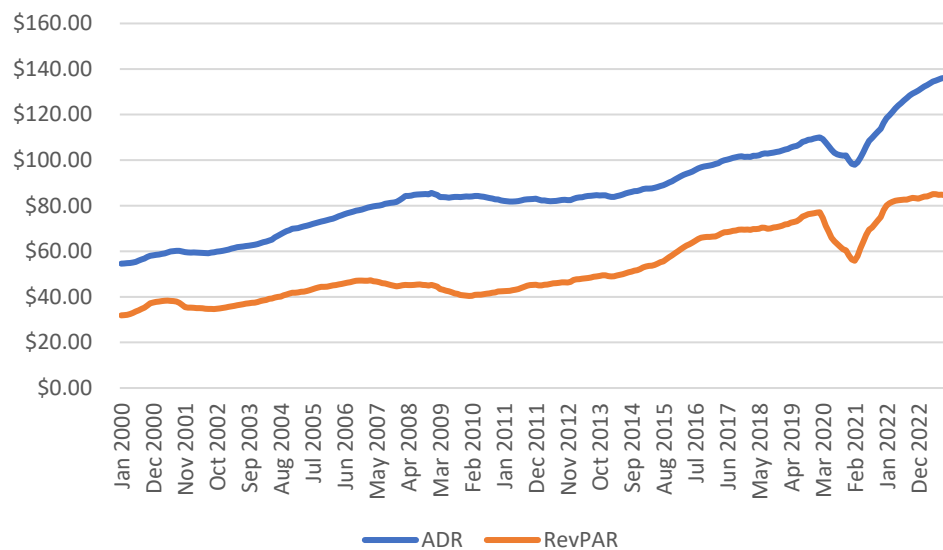
Sources: CoStar; BAE, 2023.

Data on hotel occupancy and rates are not available as part of the County's business license database. **Figure 14** reports data from CoStar, a private data vendor. Most hotel operators target an average occupancy rate of 60 to 70 percent in order to sustain operations. Figure 14 illustrates the 12-month running average occupancy rate for hotels in unincorporated Mono County. The data show significant drops in occupancy in the late 2000's, corresponding to the Great Recession, as well as in 2020-2021 corresponding with the global pandemic. As of 2022, occupancy rates recovered to an average of around 62 percent, which remains below the high of 70 percent in late 2019.

### HOTEL NIGHTLY RATES

Hotel rates are typically tracked based on the average daily rate (ADR) as well as the average revenue per available room night (RevPAR). **Figure 15** illustrates change in the ADR and RevPAR for hotel properties in the Town of Mammoth Lakes. The data indicate that, on average, both ADR and RevPAR have increased steadily over time. The exceptions include a notable slump extending from the late 2000s to mid-2010s, and an abrupt decrease as a result of the Coronavirus pandemic between 2020 and 2021, with rates resuming their prior trajectory as of 2022. CoStar estimates the ADR for the 12-months from November 2022 to October 2023 at \$136.19 for properties located in unincorporated Mono County. RevPAR for the same period averaged \$84.55.

**Figure 15. 12-Month Average Hotel ADR and RevPAR, Unincorporated Mono County, Jan 2000-Oct 2023**



Sources: CoStar; BAE, 2023.



## SHORT-TERM RENTAL INVENTORY

According to Mono County business license and TOT certificates data, there are 106 permitted STRs located throughout unincorporated Mono County. As summarized in **Table 16**, the vast majority (85 percent) of STR units with County TOT certificates are located in June Lake, with five located in or around Bridgeport and one or two located in various other locations throughout the remainder of the unincorporated county. Table 15 reports alternative data from AirDNA, a private data vendor that uses “web scraping” methods to collect data on STR listings posted to the major online platforms, like AirBNB and VRBO. According to this data, there were 165 STR listings on the market in unincorporated Mono County as of December 2023. Note, however, that these data do not distinguish between units that fit the County definition of an STR, versus those that do not. For example, the listings may include some cabin rentals that are located on larger campground properties and units listed within multi-family condominium developments. Therefore, it is not possible to determine if the additional rentals are legal or illegal rentals under existing County regulations.

**Table 15. Permitted Short-Term Rentals with Transient Occupancy Tax (TOT) Certificates, Unincorporated Mono County, December 2023**

<b>Community</b>	<b>Permitted STR Units (a)</b>	<b>STRs as a Share of All Tourist Accommodations (b)</b>	<b>STRs as a Share of the Housing Stock (c)</b>
Benton	1	8.3%	0.6%
Bridgeport	5	1.9%	1.4%
Coleville	1	1.6%	0.5%
Crowley Lake	2	3.0%	0.4%
Hilton Creek	1	100.0%	n.a.
June Lake	90	21.9%	11.0%
Lee Vining	2	1.3%	1.8%
Mammoth Lakes (Outside Town)	2	5.0%	n.a.
Topaz	2	100%	4.8%
<b>All, Uninc. County</b>	<b>106</b>	<b>10.4%</b>	<b>4.2%</b>

Notes:

(a) These figures represent TOT certificates, most of which reflect just one unit per records.

(b) Based on a comparison between the number of hotel/motel rooms/units and the full inventory of tourist accommodations, including both STRs and hotel/motel properties.

(c) Based on a comparison with the total number of housing units reported by the 2020 Decennial Census by Census Designated Place and for unincorporated Mono County.

Sources: Mono County, TOT Certificate and Business License Database; BAE, 2023.

**Table 16. Online Short-Term Rental Listings from AirDNA, Unincorporated Mono County, December 2023**

<b>Subarea (a)</b>	<b>Available Listings</b>
Benton Area	1
Bridgeport Area	12
Coleville-Walker Area	12
June Lake Area	135
Lee Vining Area	2
Topaz Area	3
<b>Total, All</b>	<b>165</b>
<b>Other Areas</b>	
Bishop Area (Inyo Cnty) (b)	69
Mammoth Lakes Area (c)	3,388

Notes:

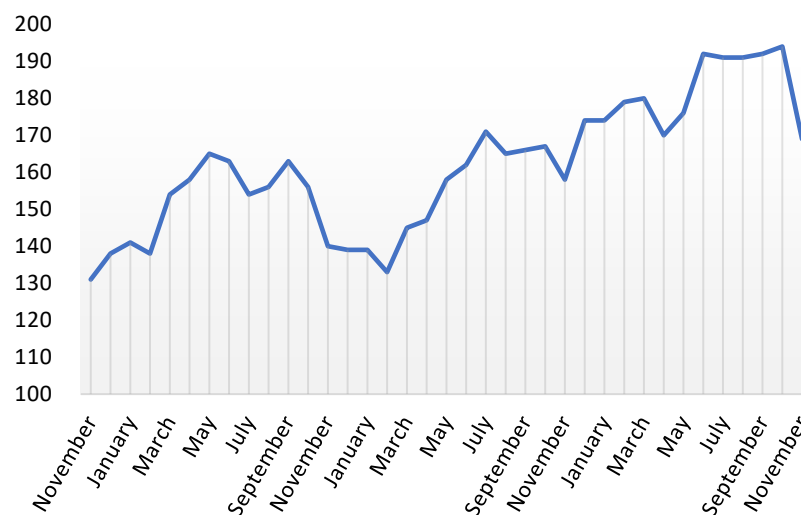
(a) Subarea definitions, as defined by AirDNA, differ significantly from the County Planning Area definitions.

(b) The Bishop subarea includes portions of portions of southern Mono County, such as the Hammil Valley, Chalfant Valley, and Oasis Planning Areas, as well as the northern portion of Inyo County that includes the City of Bishop.

(c) The Mammoth Lakes subarea includes the Town of Mammoth Lakes as well as the surrounding unincorporated area.

Sources: AirDNA; BAE, 2023.

According to data from AirDNA, the unincorporated County saw an increase in online STR listings from 131 in November 2020 to a high of 194 in October 2023, which represents an increase of 63 listings or 48 percent, though the November 2020 listings total may have been suppressed as a result of the pandemic. Due to data limitations, it is not possible to evaluate inventory trends for a longer period using either AirDNA or County TOT certifications data.

**Figure 16. Average Number of Online Listings, Unincorporated Mono County, Nov 2020 to Nov 2023**

Note: Excludes the Mammoth Lakes and Bishop areas.

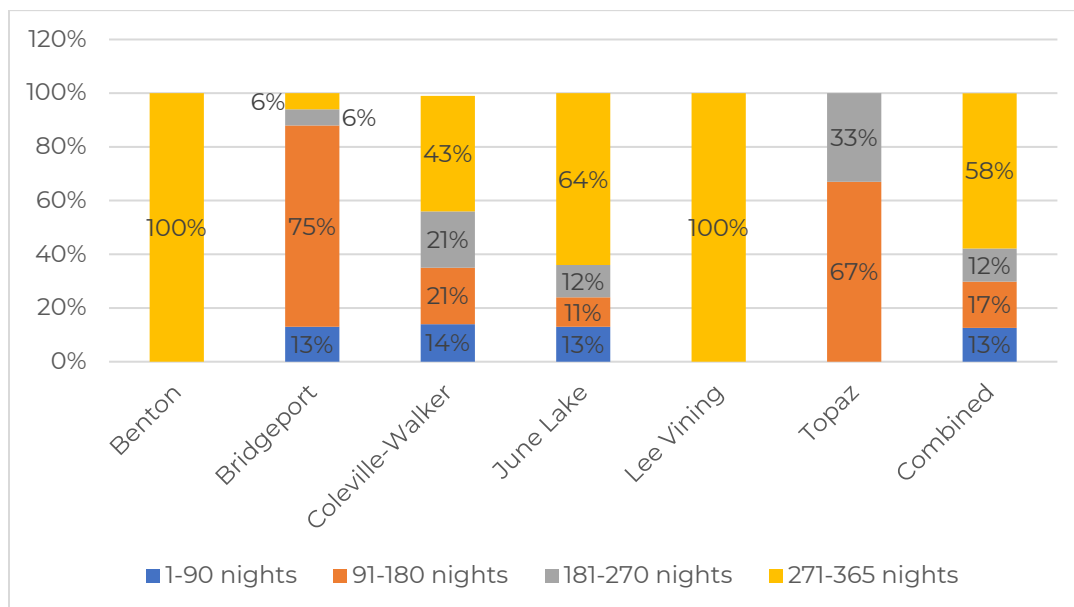
Sources: AirBNB; BAE, 2023.

**Figure 16** illustrates change in the number of online listings tracked by AirDNA, which include properties listed on AirBNB and VRBO throughout unincorporated Mono County, excluding the Mammoth Lakes area and part of Southern Mono County, which is grouped as part of the Bishop market. There is notable variation in the number of listings that are on the market at any given point in time. The data illustrate that in 2021, the unincorporated county experienced notable seasonal fluctuation in the number of online listings from a low of 138 to a high of 165. Calendar year 2022 saw a steadier fall season with the number of listings remaining relatively elevated through winter and into the spring of 2023. However, as of September 2023, the County saw a larger seasonal decline compared to 2022. Nonetheless, the number of online STR listings generally trended upwards over the last few years.

#### AVAILABILITY AND OCCUPANCY

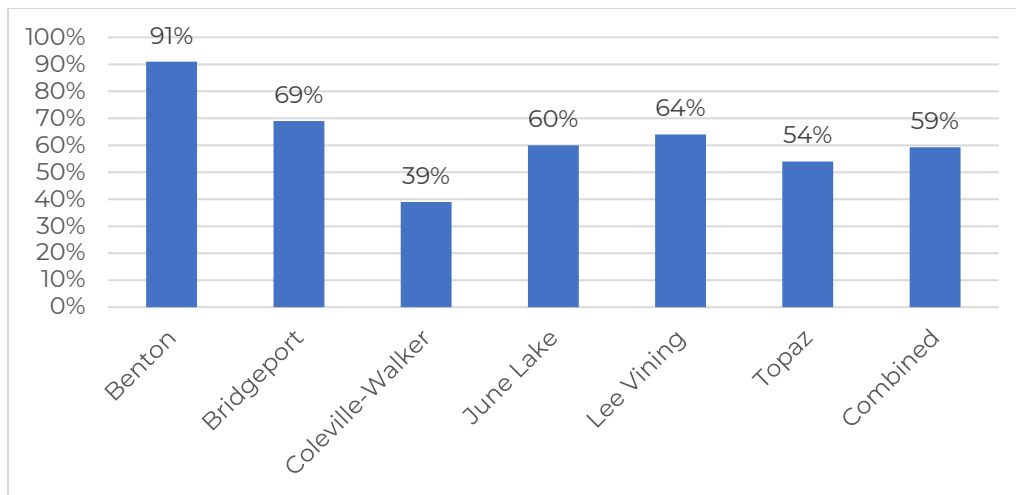
**Figure 17** illustrates the relative availability of online listings for occupancy over the last 12-months ending in November 2023, as reported by AirDNA. This data indicates a majority of listings in Benton, Coleville-Walker, June Lake, and Lee Vining are essentially available for occupancy year-round, meaning that these units can function as full-time tourist accommodations. Meanwhile, in Bridgeport and Topaz, the units that are being listed online are available for occupancy only during part of the year. One possible influencing factor is that many of the listings identified in the Bridgeport area, for example, are associated with areas that are only seasonally accessible due to weather, like the Virginia and Twin Lakes areas. Weather can also impact road conditions and the relative accessibility of many areas throughout Mono County, though only some areas are subject to seasonal road closures.

**Figure 17. Annual Availability, Unincorporated Mono County, December 2022 – November 2023**



Note: Excludes the Mammoth Lakes and Bishop areas.

Sources: AirBNB: BAE, 2023.

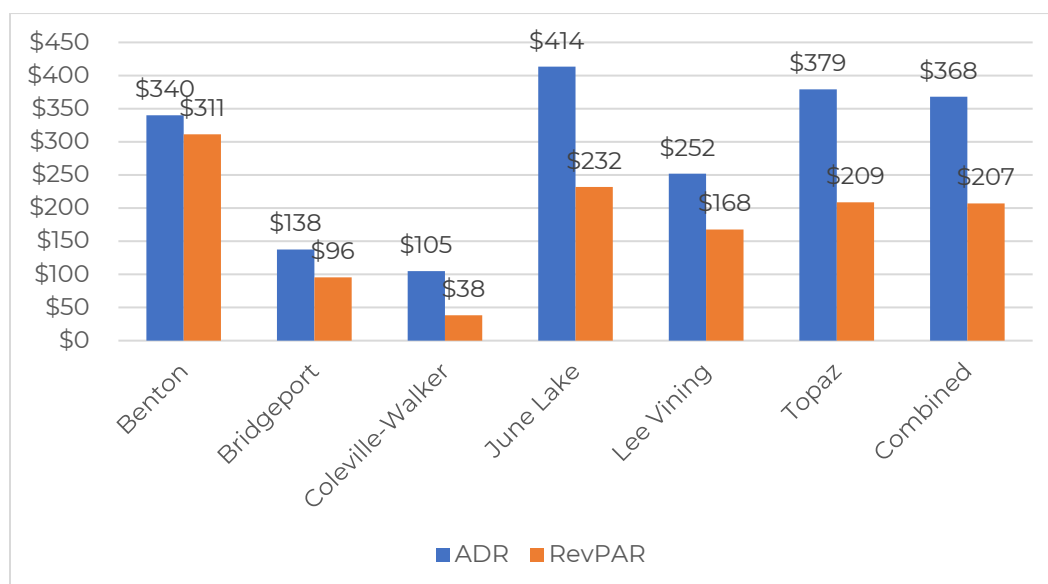
**Figure 18. Average Occupancy Rate, Unincorporated Area, November 2023**

Note: Excludes the Mammoth Lakes and Bishop areas.

**Figure 18** illustrates average occupancy rates for online listings in unincorporated Mono County. According to this data, occupancy rates range from as little as 39 percent in the Coleville-Walker area to a high of 91 percent in Benton, though both of these areas feature only a handful of listings. In June Lake, which accounts for the majority of listings, the average occupancy rate is 60 percent.

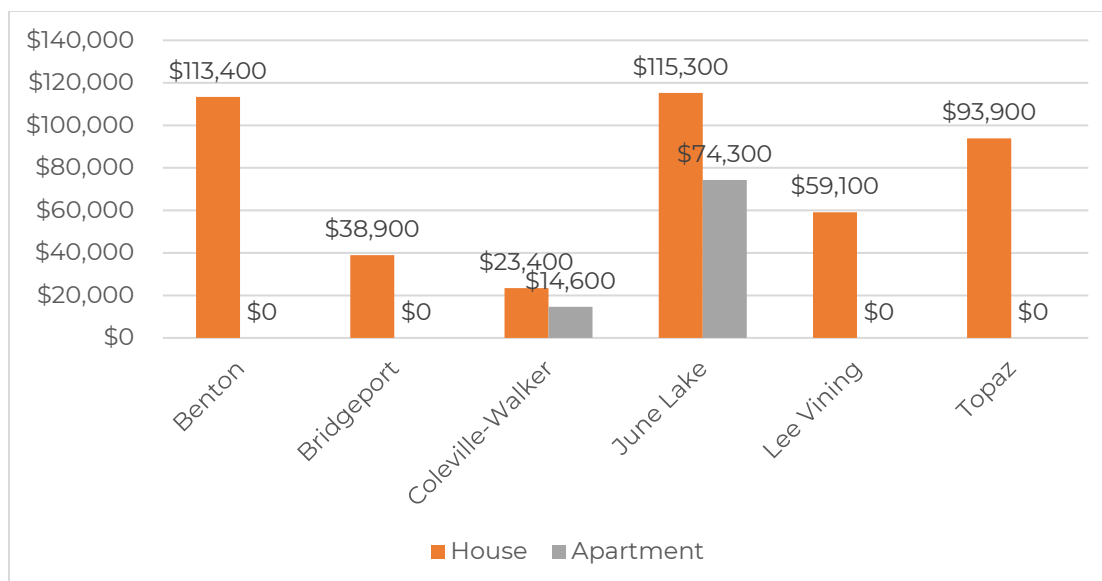
### REVENUE GENERATION

**Figure 19** illustrates the average daily rates (ADR) and revenue per available room night (RevPAR) for online listings in unincorporated Mono County. According to this data, the ADR in June Lake is \$414 per night. Rates in Bridgeport and the Coleville-Walker area are notably lower at \$105-\$138 per night. Rates in Lee Vining are in the middle at \$252 per night.

**Figure 19. Average STR ADR and RevPAR, Unincorporated Mono County, November 2023**

Note: Excludes the Mammoth Lakes and Bishop areas.

Sources: AirBNB: BAE, 2023.

**Figure 20. Gross Annual Revenue, Unincorporated Mono County, December 2022 – November 2023**

Note: Excludes the Mammoth Lakes and Bishop areas.

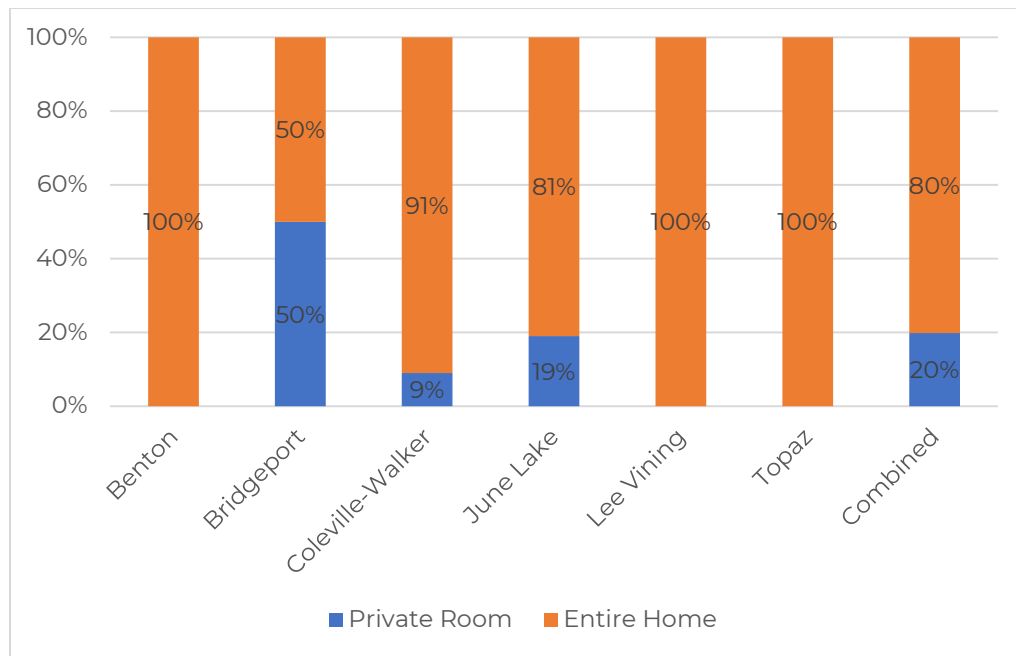
Sources: AirBNB: BAE, 2023.

**Figure 20** illustrates the average gross revenue associated with online rental listings, as reported by AirDNA. Note that these figures do not account for the costs associated with operating an online overnight tourist rental unit, such as listing fees, cleaning, and repairs. Prior research indicates that operating expenses can vary widely between operators and very little data exists to estimate a representative operating expense ratio for property owners and managers in unincorporated Mono County. Nonetheless, the data indicate that more or less full-time rental listings in desirable locations, like June Lake, can generate significant revenue. For example, the average online listing in the June Lake area grosses more than \$115,000 per year for single-family homes and \$74,000 for multi-family units.

### LISTING TYPE

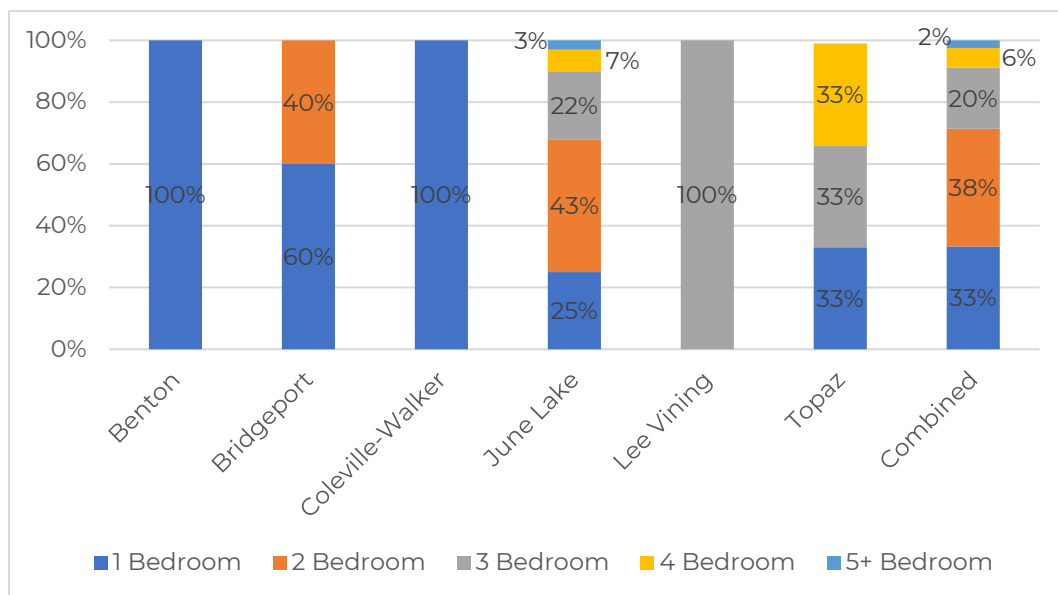
**Figure 21**, below, illustrates the distribution of online rental listings by type of rental. This data indicates that while the majority of listings in unincorporated Mono County are for the entire housing unit, roughly half of the rentals in Bridgeport and almost 20 percent in June Lake are listings for private rooms.<sup>8</sup> The Coleville-Walker area also shows that almost 10 percent of listings are for private rooms.

<sup>8</sup> As noted in the Literature Review, online listings may not be equivalent to STR definitions. E.g. Listings for private rooms may be located within a hotel or lodge complex rather than a single-family home.

**Figure 21. Listing Type, November 2023**

Note: Excludes the Mammoth Lakes and Bishop areas.  
 Sources: AirBNB: BAE, 2023.

## RENTAL UNIT SIZE

**Figure 22. Online Rental Unit Size, November 2023**

Note: Excludes the Mammoth Lakes and Bishop areas.  
 Sources: AirBNB: BAE, 2023.

**Figure 22** illustrates the distribution of online listings based on the size of the rental unit. The data indicate that more than 90 percent of units listed online for short-term rental had three or fewer bedrooms, meaning that the units would also likely be suitable for full-time occupancy by area workforce households. Only two areas had listings with four or more bedrooms. In June Lake, which had 135 total online listings, ten percent had four or more bedrooms. Topaz, which only had three listings, had one listing that was a four-bedroom single-family home.

## INDUCED WORKFORCE HOUSING DEMAND

The following section estimates demand for workforce housing created as a result of STR occupancy and associated visitor spending. Data for this analysis were primarily collected from the 2022 *The Economic Impact of Travel: California* report prepared by Dean Runyan and Associates on behalf of Visit California.<sup>9</sup> Additional data regarding average occupancy for STRs located in unincorporated Mono County were collected from AirDNA.

According to Dean Runyan, out-of-town visitors to Mono County spent approximately \$580.6 million within the county in 2022. This spending supported an estimated 5,990 jobs, including direct, indirect, and induced employment.<sup>10</sup> This equals an average of nearly \$96,928 in visitor spending per supported job. Dean Runyan estimates that visitor spending associated with travelers staying overnight in hotel, motel, and vacation rental accommodations in Mono County totaled roughly \$424.8 million in 2022. Applying the jobs multiplier derived from all visitor spending, BAE estimates that visitor spending associated with people staying in hotel, motel, and vacation rental accommodations supports 4,383 jobs, or around 73 percent of all jobs supported by destination visitor spending in Mono County. Dean Runyan further reports that the 2022 visitor spending and employment impact figures were based on an estimate of 662,159 total occupied room nights in hotel, motel, and vacation rental properties.<sup>11</sup> This implies a multiplier of 151 occupied room nights per supported job.

According to AirDNA, a private data vendor, the average STR in unincorporated Mono County was rented for 203 nights between December 2022 and November 2023. With an average of 203 occupied nights per STR, and 151 occupied nights per supported job, BAE estimates that the average STR supports around 1.3 jobs across the economy. Assuming 1.65 workers per household, based on data from the U.S. Census Bureau's Public Use Microdata Sample (PUMS), BAE estimates that the County may experience demand for 0.8 new workforce housing units for each new STR that enters the market on average, as reported in **Table 18**, below.

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<sup>9</sup> Dean Runyan and Associates. (April 2023). *The Economic Impact of Travel: California, 2022p (Preliminary)*. Prepared for Visit California. Available at: <https://industry.visitcalifornia.com/research/economic-impact>

<sup>10</sup> Direct employment represents jobs that are immediately supported by visitor spending, such as the hotel concierge and restaurant servers. Indirect employment represents jobs that are secondarily supported by visitor spending, such as grocery store suppliers, maintenance professionals, and other local area goods producers and service providers. Induced impacts are generated by households with earned income re-spending those dollars within the community on everyday goods and services.

<sup>11</sup> This figure is not reported in the 2022 travel impacts report, but was provided by Dean Runyan in an interview with BAE staff.

**Table 17. Workforce Housing Demand Induced by New STRs, Unincorporated Mono County, December 2022-November 2023**

**Visitor Spending Per Job Supported**

Destination Spending, Total (a)	\$580,600,000
<u>Supported Jobs, Total (b)</u>	<u>5,990</u>
<b>Spending Per Job Supported</b>	<b>\$96,928</b>

**Visitor Spending by Accommodation Type**

Hotel, Motel, Vacation Rental (c)	\$424,800,000
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**Jobs Supported by Accommodation Type**

Hotel, Motel, Vacation Rental (d)	4,383
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**Visitor Nights by Accommodation Type**

Hotel, Motel, Vacation Rental (e)	662,159
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**Visitor Nights Per Job Supported**

Hotel, Motel, Vacation Rental (f)	151
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**STRs Per Workforce Unit Demanded**

Ave. Occ. Nights Per Year (g)	203
Jobs Per Average STR (h)	1.3
<u>Workers Per Workforce Household (i)</u>	<u>1.65</u>
<b>Workforce Units Demanded per STR (j)</b>	<b>0.81</b>

Notes:

(a) Includes all types of spending that occur at the destination, excluding spending for ground transportation and air travel impacts that accrue to other California visitor destinations, travel arrangement services and convention/trade show services.

(b) Excludes employment impacts associated with other Travel, such as ground transportation and air travel impacts for travel to other California visitor destinations, travel arrangement services and convention/trade shows services.

(c) Includes all destination spending associated with visitors staying in hotel, motel, and vacation rental accommodations

(d) Equal to the total destination spending for travelers staying in hotel, motel, and vacation rental accommodations divided by the average visitor spending per job supported for the tourism industry in Mono County.

(e) Equal to the total visitor nights for travelers staying in hotel, motel, and vacation rental accommodations, as reported by Dean Runyan through personal communication with BAE Urban Economics.

(f) Equal to the total visitor nights for travelers staying in hotel, motel, and vacation rental accommodations divided by the total number of jobs supported by destination spending for travelers staying in said accommodations.

(g) As reported by AirDNA, a private data vendor, for the period from December 2022 to November 2023.

(h) Equal to the average occupied nights per year for STRs in Mono County divided by the average visitor nights per supported job.

(i) Equal to the average number of workers per household as reported in the U.S. Census Bureau's Public Use Microdata Sample (PUMS) for the Public Use Microdata Area (PUMA) covering Alpine, Amador, Calaveras, Inyo, Mariposa, Mono, and Tuolumne counties.

(j) Equal to the average number of STRs per unit of workforce housing demanded.

Source: Dean Runyan, The Economic Impact of Travel - California 2022p; Dean Runyan, Personal Communication; AirDNA; BAE, 2023.



## PART 5

# STAKEHOLDER ENGAGEMENT

Interviews were conducted to gain insight from community members about the issues of short-term rentals, housing needs and availability, and the potential connection between these topics. Interviews are distilled into themes and discussed in context with the findings of this study to help inform appropriate policy decisions.

### PROCESS

As part of the kick-off process, and prior to in-depth data collection and analysis, six groups of stakeholders were invited to participate in discussions about short-term rentals and workforce housing in Mono County. The groups, informed through Mono County staff, were based on similar interests, including housing, hotel/motel/lodging, small businesses, and short-term rental owners/operators. Each stakeholder interview had two to six people, lasted 45 minutes to one hour, and were conducted in-person by MIG and BAE at the Mono County Community Development office between December 11 and December 12. One additional interview was conducted virtually on January 18.

The County separately conducted a community survey to gather input and perspectives on the link between STRs and housing, policy and regulations related to the issue, and specific questions for owners and managers of STRs. The full survey results will be reported to the Board of Supervisors separately. At the time of publication, the survey results appeared to capture opinions about the Town of Mammoth Lakes' STR study, which is also underway.

### QUESTIONS

The stakeholders were asked the same questions:

Do you believe there is a link between STR rentals and the housing situation? Why or why not?

Do you think short-term rental regulation should be a part of the County's approach to improving housing market conditions? If so, what approach(es) would you recommend the County consider, including changes to the current permit process?

What approaches do you think the County should consider to incentivize property owners to make more units available for long-term rentals?

Is there anything you'd like to add that hasn't been addressed?

### KEY TAKEAWAYS

The following key themes emerged from the interviews as shared ideas and pressing points. These reflect the consolidated perspectives of the stakeholders and are not attributed to any one person or group to maintain anonymity. Because each group came from a different perspective, themes have been grouped to account for contrasting viewpoints as well as suggestions overall.

## ISSUES/POINTS OF CONTENTION

- **Data and Recordkeeping:** Participants see the conversation around rentals and housing in the county as largely anecdotal and want to see data when possible. This includes data procured for this study, but also includes a call for better record keeping of STRs including the type of unit and owner details and tracking of illegal STRs. Others shared that some data, like the number of individuals/households displaced due to STR conversion, may not be feasible to collect because of the personal landlord-renter relationships that can exist in Mono County (i.e., an individual may be evicted so a landlord can convert a unit to an STR, but the individual and landlord may be friends, so the former tenant is not likely to lodge a fair housing complaint.)
- **Time vs. Immediacy:** Many participants indicated that Mono County has already put time and effort into creating its current regulation process, including gathering community input. These participants believe that any effects from the latest regulation overhaul are still taking shape, and more time is needed before they can be fully evaluated. Others believe that the worsening housing conditions in the county requires more immediate action.
- **Scaled Housing Solutions:** Some participants are concerned that regulating STRs further will not significantly increase housing availability because there are so few STRs in the County. Others believe any increased housing availability, however incremental, would result in an overall benefit to the community. Nearly all participants agreed that new, affordable housing stock is needed and is the most scalable solution.
- **Equity Lens vs Property Owner Rights:** Some participants believe the County has a duty to address housing inequity and that regulating or limiting STRs is a valid course of action. Others believe it is not the county's place to determine what an owner can or cannot do on their own land regarding short term rental activities.
- **Location-Specific Solutions:** Most participants noted the differences in issues of housing and short-term rentals across the county, and some noted the unique attributes of Mono County as a rural county. Many cited different workforce housing needs among each community. Most participants acknowledged that the vast majority of STRs are in June Lake and that a regulation for June Lake may not be the right approach in other parts of the County. Many participants were not aware of any STRs in their neighborhood or community, do not believe there is a one-size-fits all solution, and want to make sure individual community needs are considered.
- **Development Challenges:** Many participants noted it is difficult to develop housing in Mono County due to State regulations, State building requirements, costs of land and materials, limited availability and costs of labor, and limited private land availability.

## AREAS OF AGREEMENT

Virtually all participants agreed on the following:

- Housing availability has been an issue in Mono County (and Mammoth Lakes) even before short-term rentals became more prevalent.
- STRs have increased over time; however, some of the increased activity may stem from the prevalence of STRs in other areas. For example, an individual may be able to afford a second home in Mono County because they own several STRs elsewhere.
- Housing laws increasingly provide more rights to tenants and may discourage some property owners from wanting to operate long-term rentals.
- Most second homeowners do not want to make their own houses available to long-term renters because they want to be able to use their house occasionally.
- June Lake, in particular, needs a bed base to help keep June Mountain open. At the same time, June Mountain needs adequate housing opportunities for its employees.

## STR REGULATORY SUGGESTIONS

Not all participants agreed that further STR regulation is needed to address the issue of housing. For those who supported additional regulation, participants suggested the following:

**STR Data Collection:** Improve and comprehensively track the types of STR units and information about owners.

**Long-Term Rental Tracking:** Create a system to gather (potentially anonymous) information from community members, including complaints and potential violations.

**Enforcement:** Improve enforcement of STRs, including STRs without proper permits to discourage new/continued illegal STRs.

**Geographic Limitations:** Prohibit or limit new STRs in certain locations, such as June Lake.

**Zoning Limitations:** Begin regulating STRs in multi-family residential developments (that are currently allowed without permits).

**STR Prohibitions:** Prohibit all STRs throughout the county.

**Occupied STRs:** Allow STRs in accessory dwelling units (ADUs) and/or in primary residences when a long-term occupant (owner or long-term renter) lives on the premises.

## *WORKFORCE HOUSING SUGGESTIONS*

Participants unanimously said that, regardless of STR regulation, development of new affordable housing units is necessary. Additional themes included:

### **Incentives for New Units**

- Provide low-interest loans to develop ADUs in exchange for a deed restriction limiting to long-term rental use.
- Offer loans to rehabilitate/renovate existing units.
- Give waivers or other concessions to multiple-unit residential development projects.

### **Incentives for Long-term Rentals**

- Create renter-landlord matching programs. Matching programs could span renter selection, rental management, and rental maintenance so homeowners do not need to be involved.
- Reduce or eliminate fees for projects that deed-restrict for long-term renters.
- Offer grants or stipends to property owners in exchange for long-term lease restrictions.
- Provide lodging accommodations for free or a reduced rate for second homeowners who rent their own home to a long-term renter and/or local employee.

### **US Forest Service Cooperation**

- Exchange land or enter into lease agreements with the US Forest Service to allow for more land to be developed.

### **Proactive Approach**

- Purchase properties, such as existing long-term rentals or lodging properties, when they become available to convert/preserve for long-term housing.

## PART 6

# CONCLUSIONS AND OPTIONS

Mono County has a limited number of STRs in the unincorporated area, limited data points such as housing sales and rental availability information, an overall lack of STR concentration except potentially in June Lake, a high percentage of second homes, and regulations that are more stringent than most jurisdictions. These restrictive regulations, requiring two separate public hearings, presents uncertainty to potential STR owner/operators who are only allowed to have one STR in the unincorporated area.

It is difficult to draw a strong conclusion about the correlation between the number and prevalence of STRs and the lack of available housing in Mono County. Based on the County's history, there has been a long-standing issue with the shortage of affordable housing beyond when STRs had a strong presence in the community.

By contrast, Mammoth Lakes, (the only incorporated city in Mono County), has a strong concentration of STRs, which may be effectively pushing the local workforce towards the unincorporated areas of the county, and highlighting the shortage of long-term housing solutions. At the same time, some correlation does exist between the existence of STRs and the availability of housing for local employees based on job generation per occupied room.

Current Mono County policies have accomplished the goal of preventing an increase of STRs in unincorporated residential neighborhoods, while still providing a portion of the bed base in high-tourist areas such as June Lake.

### POLICY CONSIDERATIONS

Moving forward, the County may want to identify its objectives regarding short-term rentals and workforce housing availability to inform its policy and procedural changes. The following are sample policy objectives and policy changes that can be considered by the Board of Supervisors. The options are not mutually exclusive, and may be selected or omitted as needed.

*Policy Objective:* **Limit or decrease the number of existing STRs.**

Set a numeric cap on STR permits countywide.

- The cap may be set at the current number of permits (106), or
- The cap could accommodate for a defined increase, or
- The cap could be set at a lower number than existing permits, or

Set a numeric cap on STR permits in a specified geographic location.

For example, the County may consider capping the number of STRs in June Lake at its current level.

As a part of any cap, the County may want to establish a lottery or random selection system in the event the number of permits available is less than the number of interested permittees.

Alternatively, the County could establish a first-come, first-served system for available STR permits.

Change the General Plan and Zoning Code and prohibit STRs in some or all residential areas.

The County may want to phase this in through the permit renewal process.

*Policy Objective:* **Prevent neighborhood impacts and nuisances.**

Retain existing permitting requirements.

Increase violation fees.

Increase compliance staffing.

*Policy Objective:* **Discourage investment or commodification of housing.**

Implement a waiting period before any new property owner can apply for an STR permit.

Prohibit STR permits for a specified period where an eviction has occurred on properties in the previous two years.

Require registration for all long-term rentals, or for rentals between 30-90 days if an overall long-term rental registration is too resource-intensive.

This may prohibit individuals from renting properties for more than 30 days to avoid STR regulations and allowing short-term renters to cut the stay short.

Amend language in the code regarding property rights.

While the annual renewal process makes it clear that STR permits do not run with the land, the County Code does not use that explicit language.

Amend definition of short-term rentals of residential properties to include fractional ownership and/or time shares.

Prohibit new STRs.

*Policy Objective:* **Preserve and encourage workforce housing units.**

Require the same approval process for MFR units as SFR units, presuming that MFR units are primarily intended to be residential uses and appropriate for workforce housing.

Require a minimum STR size (floor area) for new STR permits to increase the likelihood that smaller housing units are retained as long-term housing and thereby more affordable to the local workforce.

Partner with an organization to create a renter-owner matching program (non-profit, partnership).

*Policy Objective:* **Increase available bed base without affecting long-term rental availability.**

Allow “hosted” STRs and change county definitions and regulations around “occupied” STRs.

A hosted STR could require a long-term occupant on any portion of the property in exchange for allowing an STR, rather than the owner/property manager simply being present for the duration of the rental.

Exempt hosted rentals from a permit cap (if adopted) or allow in zones that don’t otherwise allow STRs.

Allow a long-term renter to occupy an ADU on a property while still allowing short-term rentals in the main home.

This could be consistent with the General Plan goal of promoting a sharing economy because the ADU would be occupied full time, the primary use would be residential and the temporary short-term rental would remain as an accessory use.

Allow an ADU to be an STR if the main unit is occupied by the owner or a long-term renter.

*Policy Objective:* **Encourage development of workforce housing units.**

Allow one new STR to be permitted in exchange for three new workforce housing units, based on the job generation rate.

Publicize the County's pre-approved Accessory Dwelling Unit (ADU) plans.

Highlight State housing laws that ministerially allow 100% affordable housing developments.

Offer loans and/or grants for building or rehabilitating or preserving long-term housing.

Partner with Sierra Business Council or create an ombudsperson position to help shepherd housing development applicants through the development review and permitting process.

*Policy Objective:* **Adjust to the market and STR trends.**

Consolidate STR permitting and tracking and create a universal tracking system.

Collect code compliance data.

Track and report on STR TOT revenue.

Track and report on STR permit activity and trends in the County's annual report.

*Policy Objective:* **Create an equitable permitting process.**

Consolidate the permitting process into a single unified procedure with a single set of terms and requirements for all permits, regardless of land use designation. This could include the following:

- Require a Use Permit (Planning Commission) and STR Permit (Board of Supervisors) for all residential properties in all residential zoning districts.
- Consider giving VHR permit holders one year to submit an application for CUP and STR permits.
- Continue to require annual renewals for all STR Permits.



*Policy Objective:* **Engage with regional partners.**

Encourage the Town of Mammoth Lakes to regulate STRs. Additional regulations in Mammoth Lakes may help to maintain availability of long-term housing, which may help avoid impacts on long-term housing availability in the unincorporated county.

### *HOUSING DEVELOPMENT LIMITATIONS*

During the stakeholder engagement, some commenters stated that the development review process in Mono County makes it difficult and/or cost prohibitive to build workforce housing. There are several barriers or factors that are outside of the County's control.

- **State Codes:** Like all jurisdictions in California, Mono County is subject to, and must enforce, State laws for all development and construction. For example, the California Environmental Quality Act (CEQA) requires all development projects to be evaluated for their impacts on the environment. The California Building Standards Code (Cal. Code Regs., Title 24), which is updated every three years and includes energy requirements, applies to all construction projects. Similarly, all projects are subject to regulatory processes, such as tribal consultation requirements.
- **Development Costs:** The cost of land, labor, and materials comprise a large barrier to development in Mono County, in part because of scarcity of land and workforce, and in part due to location relative to building material availability.
- **Community Sentiment:** Like many jurisdictions, Mono County decisionmakers weigh the wishes of community members when making land use decisions. In some cases, this has led to housing projects being denied.

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## Appendix A

**Attachment A: Occupancy and Vacancy Status by Census Designated Place (CDP), 2010 and 2020 Census (Page 1 of 2)****2010 Census**

<b>Study Area</b>	<b>Total Housing Units</b>	<b>Occupied Units</b>	<b>Vacant Units</b>	<i>For rent</i>	<i>Rented, not occupied</i>	<i>For sale only</i>	<i>Sold, not occupied</i>	<i>For seasonal or occasional use</i>	<i>For migrant workers</i>	<i>Other vacant</i>
Aspen Springs CDP	36	25	11	0	0	0	0	11	0	0
Benton CDP	159	122	37	7	2	1	1	16	0	10
Bridgeport CDP	357	257	100	23	1	9	1	47	0	19
Chalfant CDP	301	264	37	3	0	6	1	19	0	8
Coleville CDP	201	171	30	6	0	1	1	11	0	11
Crowley Lake CDP	499	367	132	11	1	9	2	98	0	11
June Lake CDP	820	290	530	18	3	14	1	487	0	7
Lee Vining CDP	112	85	27	5	0	1	0	13	8	0
McGee Creek CDP	30	21	9	0	0	0	0	8	0	1
Mono City CDP	94	63	31	0	0	0	1	28	0	2
Paradise CDP	87	74	13	1	0	1	0	11	0	0
Sunny Slopes CDP	156	85	71	0	0	0	0	69	0	2
Swall Meadows CDP	128	98	30	0	0	0	0	30	0	0
Topaz CDP	42	21	21	4	0	1	0	12	0	4
Twin Lakes CDP (b)	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.
Virginia Lakes CDP (b)	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.
Walker CDP	445	335	110	20	1	11	0	48	0	30

**2020 Census**

<b>Study Area</b>	<b>Total Housing Units</b>	<b>Occupied Units</b>	<b>Vacant Units</b>	<i>For rent</i>	<i>Rented, not occupied</i>	<i>For sale only</i>	<i>Sold, not occupied</i>	<i>For seasonal or occasional use</i>	<i>For migrant workers</i>	<i>Other vacant</i>
Aspen Springs CDP	41	28	13	5	0	1	0	7	0	0
Benton CDP	157	127	30	1	0	0	5	15	0	9
Bridgeport CDP	349	246	103	4	2	2	3	81	0	11
Chalfant CDP	313	268	45	4	0	1	1	14	0	25
Coleville CDP	190	150	40	9	3	3	2	20	3	0
Crowley Lake CDP	538	402	136	13	0	6	0	109	0	8
June Lake CDP	811	277	534	20	12	4	4	486	0	8
Lee Vining CDP	114	88	26	0	0	0	0	23	0	3
McGee Creek CDP	25	15	10	5	0	0	0	5	0	0
Mono City CDP	116	87	29	0	0	0	4	19	0	6
Paradise CDP	104	84	20	0	0	0	0	20	0	0

Sunny Slopes CDP	<b>156</b>	83	73	0	0	0	0	73	0	0
Swall Meadows CDP	<b>128</b>	94	34	2	0	0	0	31	0	1
Topaz CDP	<b>94</b>	73	21	0	0	1	0	10	0	10
Twin Lakes CDP (b)	<b>243</b>	24	219	3	2	3	0	209	0	2
Virginia Lakes CDP (b)	<b>104</b>	0	104	2	0	0	0	101	0	1
Walker CDP	<b>426</b>	326	100	5	0	8	7	43	4	33

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**Attachment A: Occupancy and Vacancy Status by Census Designated Place (CDP), 2010 and 2020 Census (Page 2 of 2)**

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Notes:

(a) Due to changes in CDP definitions that occurred between the 2010 and 2020 Decennial Census', the observed change in the total number of housing units, as well as the number of occupied and vacant housing units is subject to unknown error and should be interpreted with significant caution.

(b) The 2010 Decennial Census did not include this CDP as a defined geography.

Sources: U.S. Census Bureau 2010 and 2020 Decennial Census, Table H1 and H5; BAE, 2023.



**Appendix B: Inventory of Hotel/Motel and Related Tourism Accommodation Providers, December 2023**

Business Name	Address	Place	Rooms/Units
THE OLD HOUSE & INN AT BENTON	55137 HIGHWAY 120	BENTON	11
ANNETT'S MONO VILLAGE	13425 TWIN LAKES ROAD	BRIDGEPORT	33
BIG MEADOW LODGE	74878 HIGHWAY 395	BRIDGEPORT	6
BRIDGEPORT INN	205 MAIN STREET	BRIDGEPORT	32
HUNEWILL GUEST RANCH	1110 HUNEWILL RANCH ROAD	BRIDGEPORT	(a)
MOORE BRIDGEPORT RENTALS	264 HWY 182	BRIDGEPORT	4
REDWOOD MOTEL	425 MAIN STREET	BRIDGEPORT	19
RUBY INN	333 MAIN STREET	BRIDGEPORT	30
SILVER MAPLE INN	310 MAIN STREET	BRIDGEPORT	20
THE BODIE HOTEL	287 MAIN STREET	BRIDGEPORT	7
THE CAIN HOUSE	340 MAIN STREET	BRIDGEPORT	10
VIRGINIA CREEK SETTLEMENT	70847 HIGHWAY 395	BRIDGEPORT	10
VIRGINIA LAKES RESORT	LITTLE VIRGINIA LAKES ROAD	BRIDGEPORT	20
WALKER RIVER LODGE	100 MAIN STREET	BRIDGEPORT	36
WILLOW SPRINGS RESORT	70970 HWY 395	BRIDGEPORT	35
ANDRUSS MOTEL	106964 HWY 395	COLEVILLE	13
MEADOWCLIFF LODGE & KOA	110437 US HWY 395	COLEVILLE	20
SIERRA RETREAT	106705 HWY 395	COLEVILLE	6
TOIYABE MOTEL	107045 HWY 395	COLEVILLE	11
WEST WALKER MOTEL	106833 HWY 395	COLEVILLE	11
MCGEE CREEK LODGE	1561 CROWLEY LAKE DRIVE	CROWLEY LAKE	10
MONO SIERRA LODGE	4135 CROWLEY LAKE DRIVE	CROWLEY LAKE	(a)
ROCK CREEK LODGE	85 ROCK CREEK CANYON	CROWLEY LAKE	17
SIERRA GABLES	4015 CROWLEY LAKE DRIVE	CROWLEY LAKE	18
TOM'S PLACE RESORT	8180 CROWLEY LAKE DRIVE	CROWLEY LAKE	19
BIG ROCK RESORT	120 BIG ROCK ROAD	JUNE LAKE	18
BOULDER LODGE	40 BOULDER DRIVE	JUNE LAKE	62
DOUBLE EAGLE RESORT AND SPA	5587 CA-158	JUNE LAKE	32
GULL LAKE LODGE	132 BRUCE STREET	JUNE LAKE	15
HEIDELBERG INN EXTRA HOLIDAY	2635 HIGHWAY 158	JUNE LAKE	46
JUNE LAKE MOTEL	2716 HWY 158	JUNE LAKE	27
JUNE LAKE PINES	2733 HWY 158	JUNE LAKE	15
JUNE LAKE VILLIGER	2640 HWY 158	JUNE LAKE	22
LAKE FRONT CABINS	32 BRENNER ST	JUNE LAKE	10
REVERSE CREEK LODGE	4479 HWY 158	JUNE LAKE	15
SILVER LAKE RESORT	6957 HWY 158	JUNE LAKE	20
THE FOUR SEASONS RESORT			
LEGACY	24 VENICE STREET	JUNE LAKE	5
THE HAVEN	78 KNOLL AVENUE	JUNE LAKE	10
WHISPERING PINES CHALET	18 NEVADA STREET	JUNE LAKE	24
EL MONO MOTEL	51395 HWY 395	LEE VINING	11
LEE VINING MOTEL	51435 HWY 395	LEE VINING	8
LUNDY LAKE RESORT	5109 LUNDY LAKE RD	LEE VINING	8
MONO LAKE HOUSE	54880 HWY 395	LEE VINING	1
MURPHYS MOTEL	51481 HWY 395	LEE VINING	43
TIOGA LODGE	54411 HWY 395	LEE VINING	17
YOSEMITE GATEWAY	51340 HWY 395	LEE VINING	20
LAKEVIEW LODGE	51285 HWY 395	LEE VINING	46
		MAMMOTH	
CONVICT LAKE RESORT	2000 CONVICT ROAD	LAKES	29
	85 HOT CREEK HATCHERY	MAMMOTH	
HOT CREEK RANCH, LLC	ROAD	LAKES	9

Note:

(a) Estimated room and/or unit count data was unavailable.

Sources: Mono County; BAE, 2023.



# Mono County Short-Term Rental Study

Board of Supervisors Meeting - February 20, 2024



# Introduction

*Wendy Sugimura,  
Community Development Director – Mono County*



# Background

- **May 3, 2022:** Emergency moratorium adopted on new short-term and transient rentals in all single-family residential units in any land use designation.
- Moratorium extended to **April 29, 2024.**
- Board directed staff to
  - 1) study the impacts of nightly rentals on housing availability, and
  - 2) return with a moratorium on nightly rentals in multi-family residential units for Board consideration.
- The Board disapproved a moratorium on multi-family residential units in October 2023.



Photo credit: Mono County Tourism and Film Commission

# Introduction – Short Term Rental Study

The Board approved the budget for the STR study in September 2023, and then the study scope in October 2023.

Board Presentation Outline:

1. The consultant team will present the results of the study.
2. Staff will present the results of the community survey.
3. Staff will present next steps.

## **Today's purpose:**

Receive general policy direction from the Board of Supervisors for further public feedback.

# Report Summary

*Shawna Brekke-Read,  
Project Director - MIG*





- **Part 1:** Background
- **Part 2:** Literature Review
- **Part 3:** Policy Analysis
- **Part 4:** Economic Analysis
- **Part 5:** Stakeholder Engagement
- **Part 6:** Conclusions and Options



Photo credit: Mono County Tourism and Film Commission



# Part 1: Background



- STR regulations dating back to 2012 and earlier
- Multiple revisions of the code, with community input
- Three moratoriums, latest in May 2022

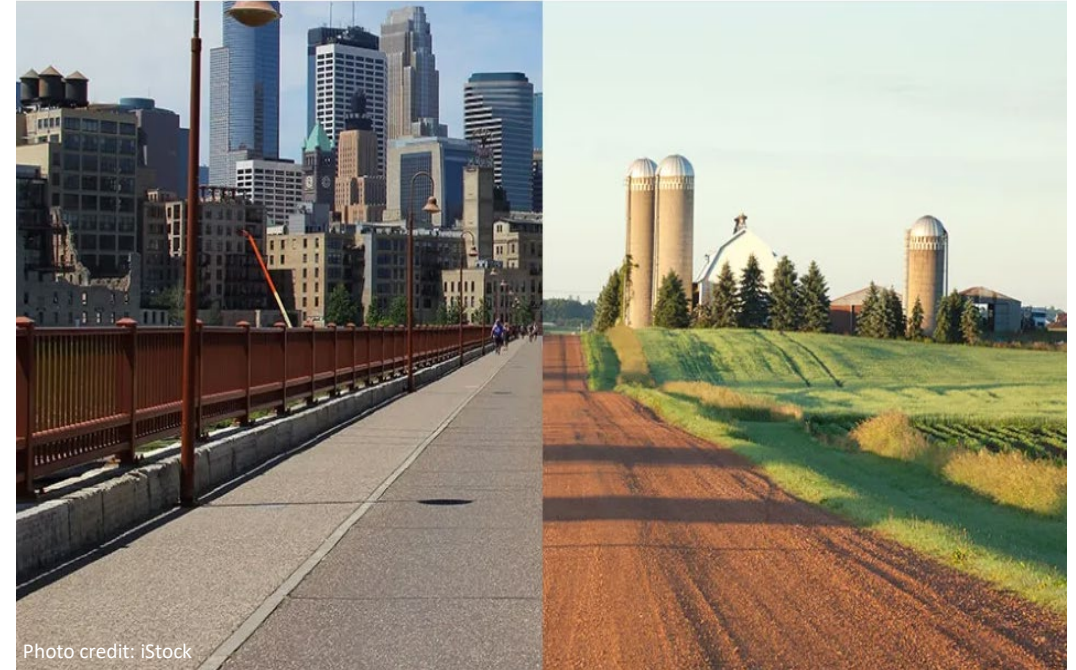


# Part 2: Literature Review



# Literature Review – Works Cited

- 50+ academic articles and industry publications
- Impact of STRs on Tourist Accommodations and Housing Markets
- Most research focused on urban markets - rural or less dense case studies were included



# Literature Review – STRs and Housing Market

- Impact varies
  - Stronger
    - Less owner-occupied housing, and
    - Smaller inventories of motel/hotel
  - Weaker
    - Smaller number of STRs compared to total housing stock
- “Hotelization” – revenue stream from housing





# Literature Review – STRs and Tourist Accommodations

- Likely impact on hotel/motel in same market
  - Occupancy
  - Price



Photo credit: Mono County Tourism and Film Commission

# Part 3: Policy Analysis



19 “mountain resort” communities identified:





# Policy Analysis - Summary

- Most have:
  - Permit/license requirements
  - Standard operational requirements
  - STR regulations based on land use, with more residential restrictions
- About half include workforce housing as policy rationale
- Majority do not have permit caps



# Policy Analysis – Mono County Comparison

- Housing Mitigation Fee
- Stricter Process for STRs in residential land uses
  - Two permits
  - BOS approval
- Only Jurisdiction
  - Differentiates STR vs VHR permits
  - Limits one permit/individual
- More Stringent - “Occupied” or “Hosted” STRs



Photo credit: Mono County Tourism and Film Commission

# Part 4: Economic Analysis





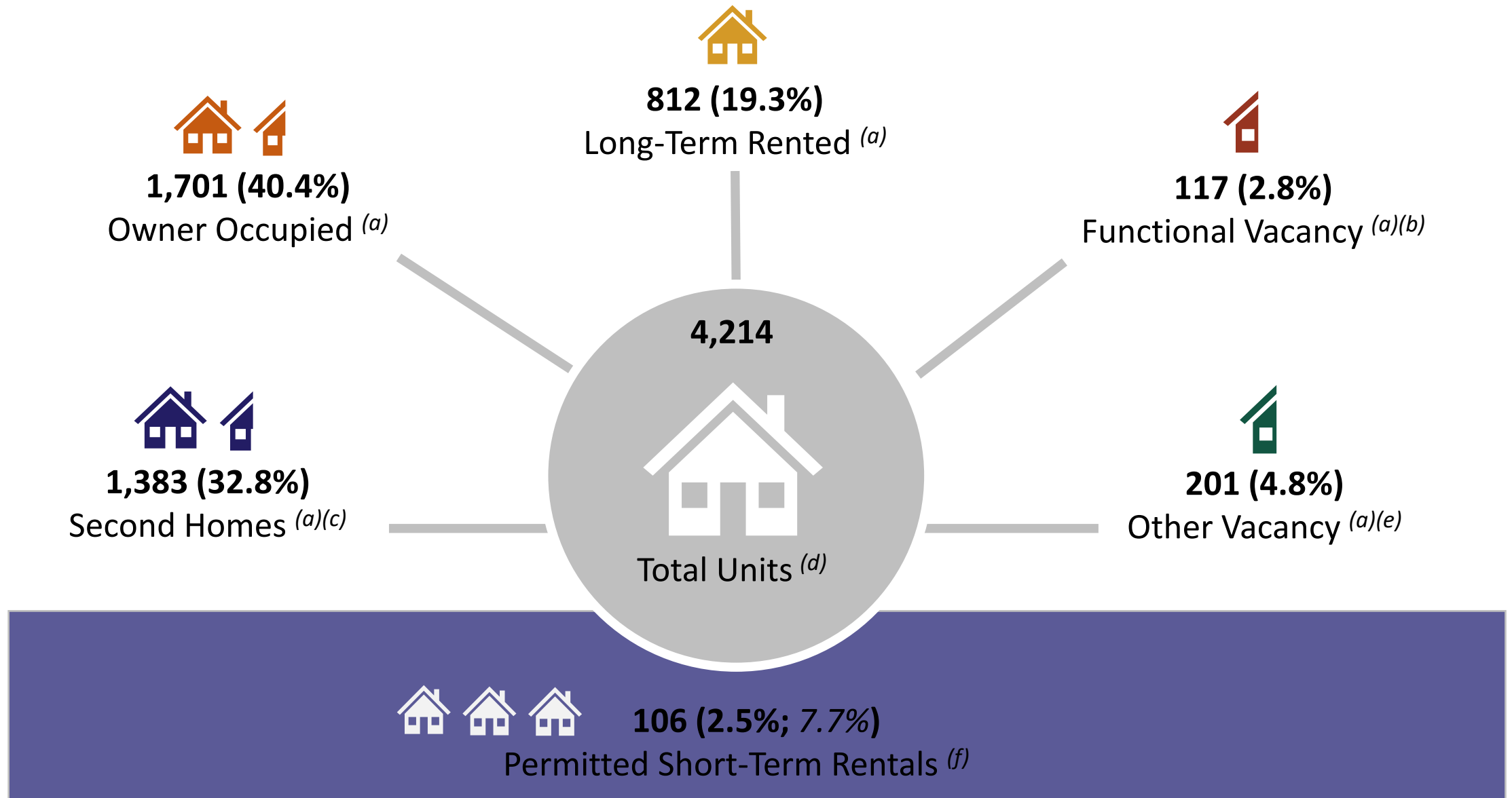
# Mono County Housing Stock

174

- 13,912 units countywide
- 4,214 unincorporated area
- ~60% full-time occupied
  - 2/3 owner-occupied
  - 1/3 rented
- ~40% “second homes”



Photo credit: Mono County Tourism and Film Commission



Housing Stock Utilization, 2023 est.

# Home Sales and Prices – Unincorporated County

## Single-Family Residences

- Majority of Sales 2019-2023
- Most in Long Valley, Bridgeport, June Lake, and Antelope Valley Planning Areas

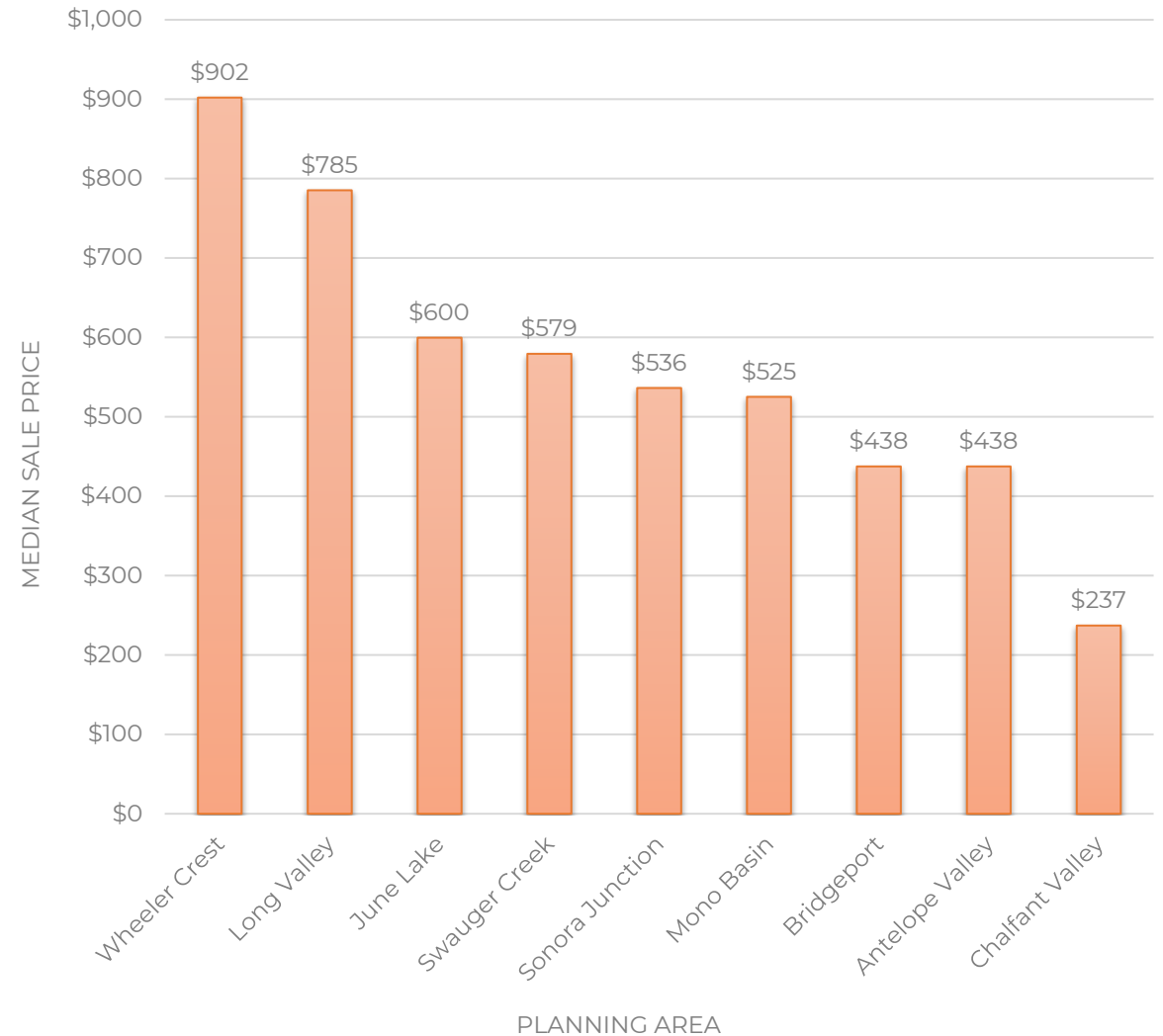
## Condominiums Had Higher Average Sales Price

- \$626,800 average sale price
- Typical HOA Dues - \$400 - \$650/month



# SFR Housing Sales

- Highest median single-family home prices in 2023 (January-November):
  - Wheeler Crest,
  - Long Valley (only owner-occupied STRs allowed),
  - June Lake (depends on location), and
  - Swauger Creek
- Lowest median sales prices:
  - Antelope Valley (STRs allowed)
  - Chalfant Valley





# Rental Rates Summary

- Limited Number of Rentals
- Relatively Affordable Rents
- Rentals Likely Go to Higher-Income Households





# Labor Force Trends

- 8,162 employed persons (avg)
  - **87% live in Mono County**
  - 13% commute from other counties
- 8,095 employed residents (avg)
  - **88% work in Mono County**
  - 12% commute to other counties



# Labor Force Trends

180

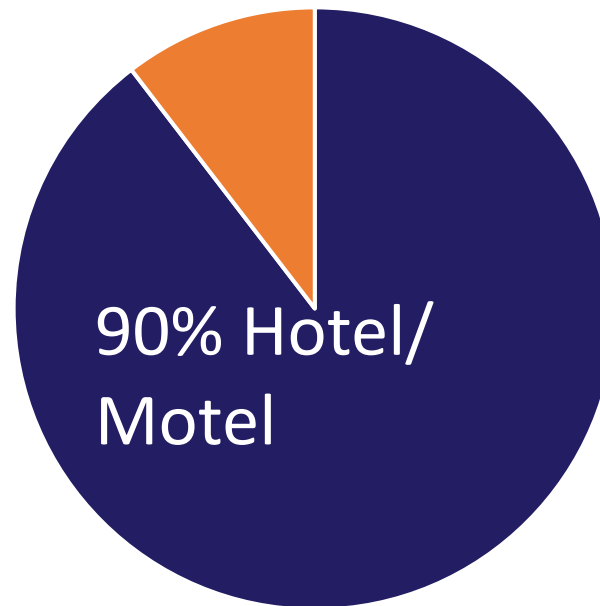
	<b>Mono County</b>	<b>Town of Mammoth Lakes</b>
2015-2019	Stable Work Force	Downward Trend in Unemployment
2018-2019		Stabilized unemployment at .05%
April 2020	28.5%- unemployment high	
Early-mid 2021	3-4% unemployment – <i>similar to pre-pandemic trends</i>	~0% unemployment

# Tourism Accommodation Industry Trends

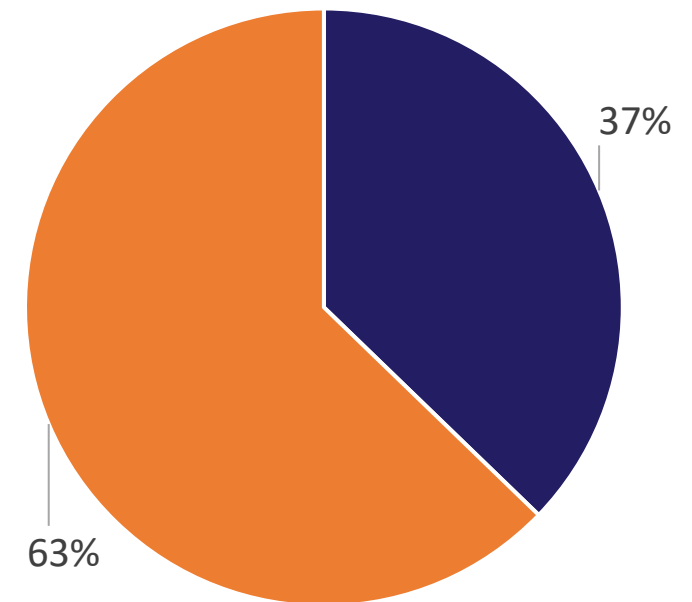
181

- Tourism is primary economic driver
- 911 tourist accommodation units (TAUs)
- Short-term rentals (STRs) - ~10% of all TAUs -

Uninc. Mono County



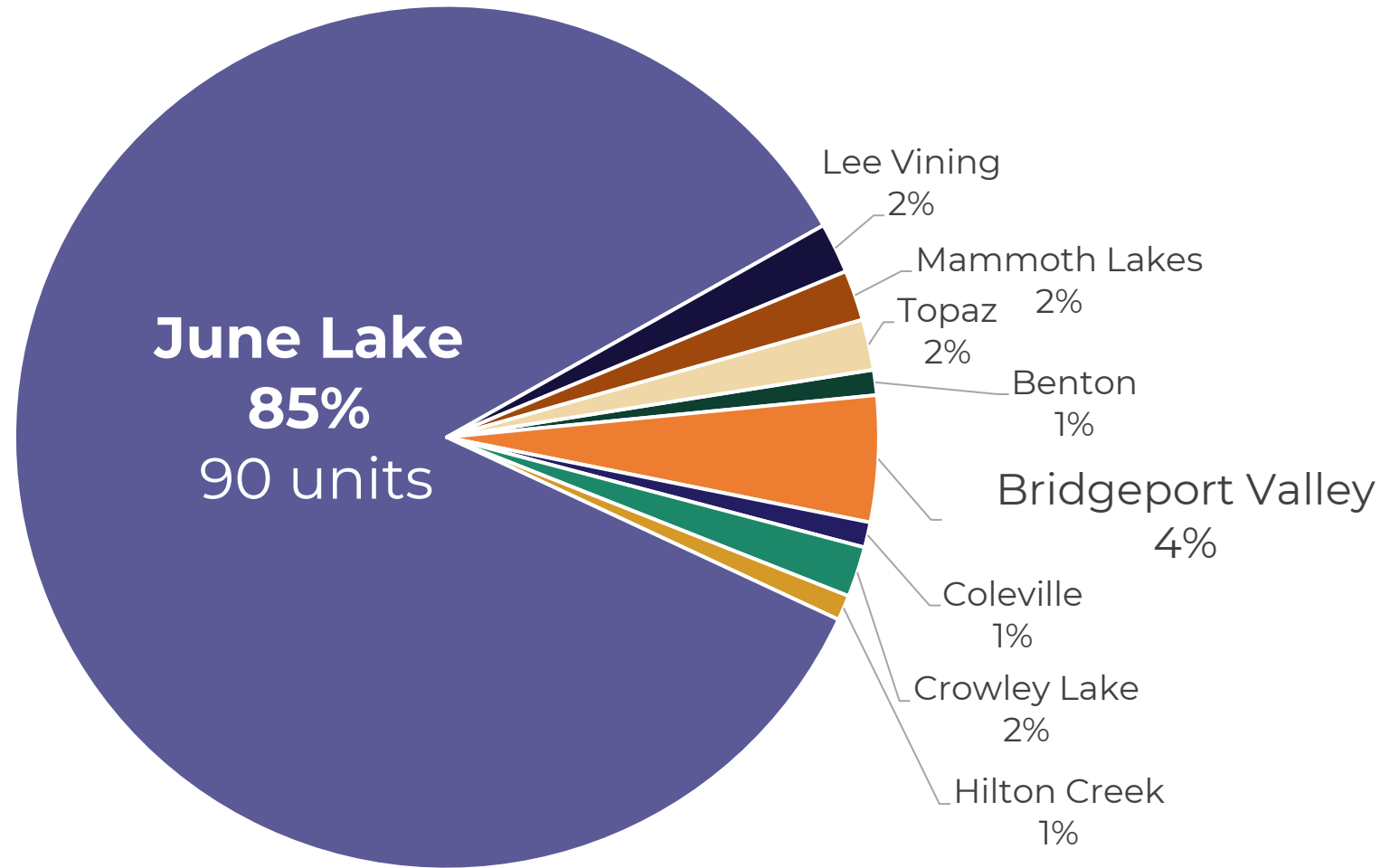
Mammoth Lakes



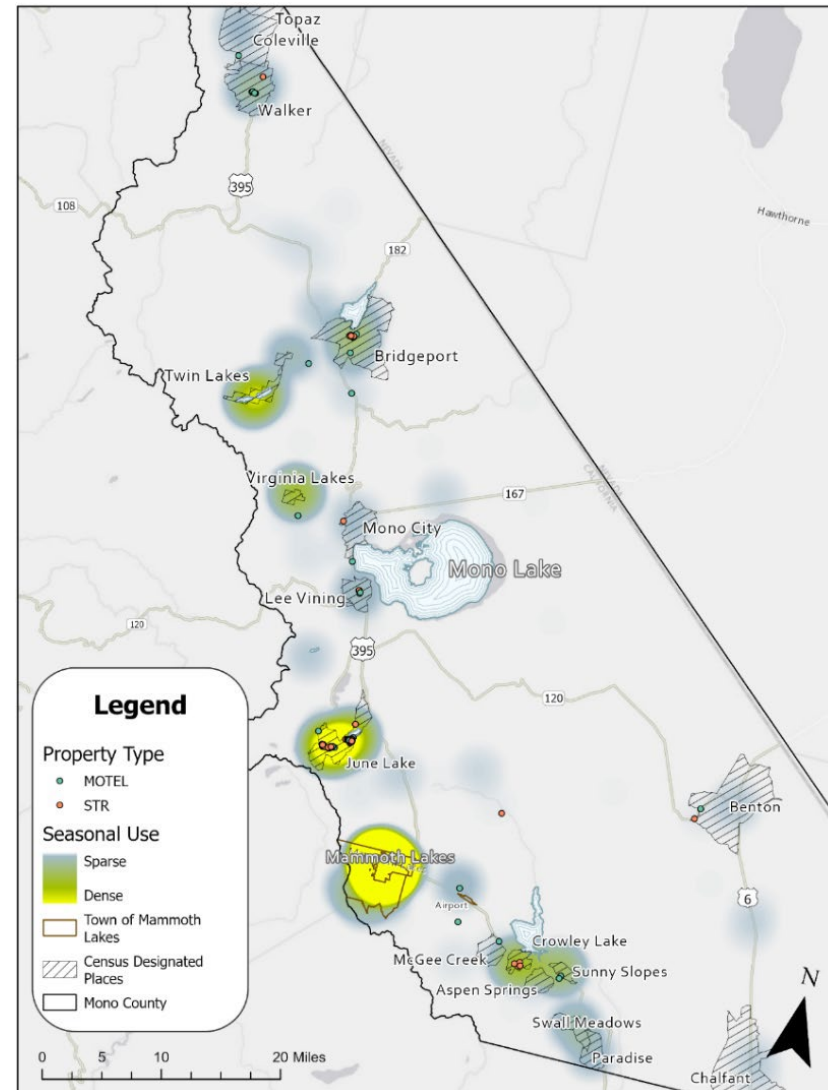
■ Hotel/Motel ■ STR

# STRs by Location

**106 Units**

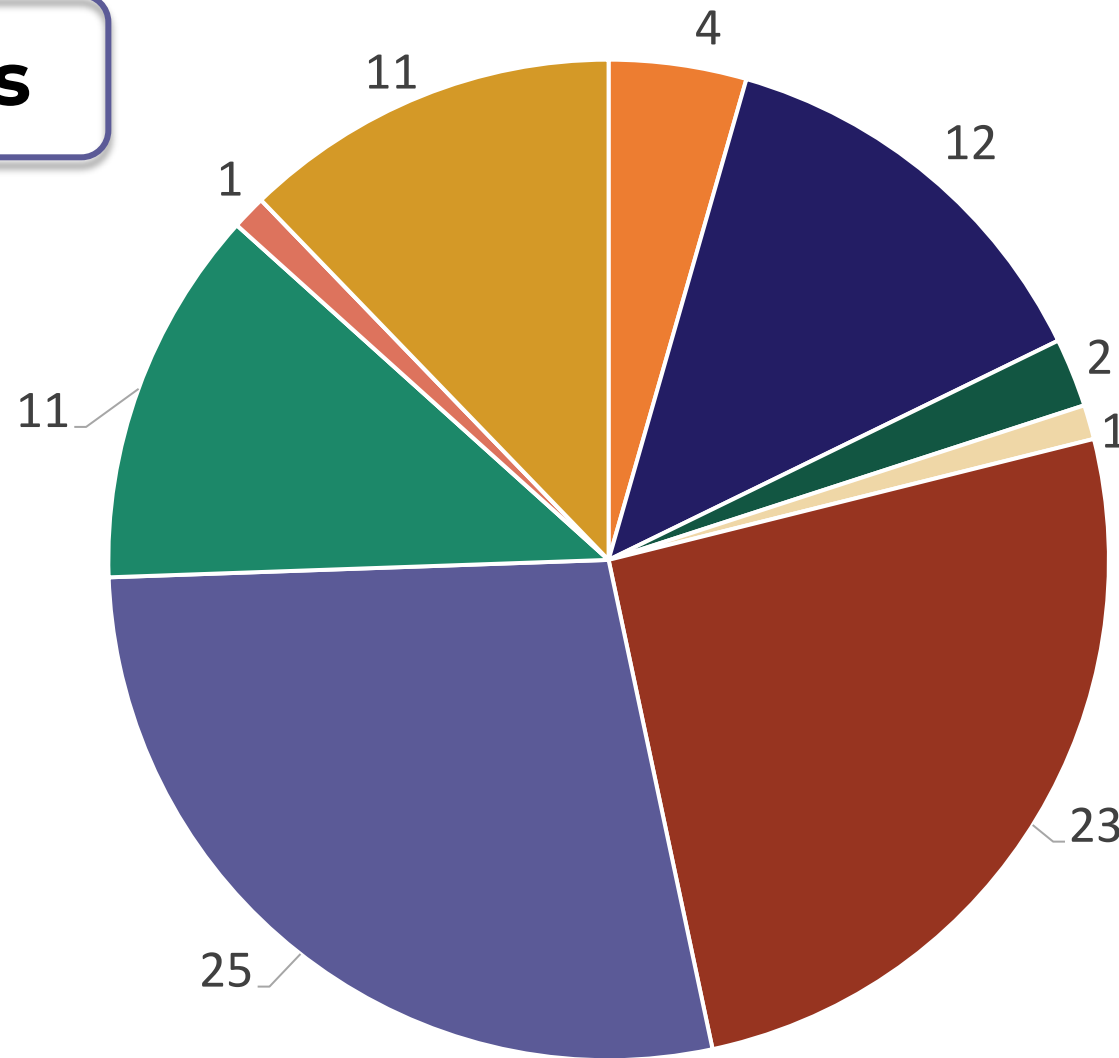


# Seasonal Vacancy



# June Lake STRs by Land Use Designation<sup>184</sup>

**90 Units**



- AG
- C
- CL-H
- CL-M
- ER
- MFR-H
- MFR-L
- MU
- OS
- RMH
- RR
- SFR

# Occupancy and Revenue Generation

185

Area	Average Occupancy Rates	Average Daily Rates
Coleville-Walker	39%	\$105
Benton	91%	\$138
<b>June Lake</b>	<b>60%</b>	<b>\$414</b>
Lee Vining	64%	\$252

# Induced Workforce Housing Demand

186

- Most (75%) Destination-Related Jobs in the County - hotel, motel, vacation rental overnight visitors
- Short-Term Rentals in Mono County Supports Jobs
- Each New Short-Term Rental in Mono County Requires Workforce Housing



Photo credit: Bridgeport Chamber of Commerce



# Part 5: Stakeholder Engagement



- Six interviews
  - Five in-person
  - One virtual
- 45-minutes; four questions
- Housing
- Local Business
- Hotel and Motel
- STR Owners and Managers
- Housing Ad Hoc



- **Data Needed**
- Time and Resources –  
**Current Short-Term Rental Regulations vs. Immediacy of Housing Issues**
- The Issue of Scale –  
**More Development vs. Incremental Change**



- Equity Lens vs. Property Owner Rights – **County's Role**
- **Location-Specific Solutions**
- **Longstanding Issue – Housing Availability**



# Part 6: Conclusion and Options





# Conclusion

- No obvious correlation between STRs and housing, county-wide
- June Lakes area may have stronger correlation
- Possible influence from Mammoth Lakes
  - Mammoth Lakes STRs pushing workforce into the County for housing
  - ~0.85 new jobs/STR - need workforce to support



# Options - Policy Objectives

1. Limit or decrease the number of existing STRs.
2. Prevent neighborhood impacts and nuisances.
3. Discourage business investment in or commodification of housing.
4. Preserve and encourage workforce housing units.
5. Increase available bed base without affecting long-term rental availability.
6. Encourage development of new workforce housing units.
7. Adjust to the market and STR trends.
8. Create an equitable permitting process.
9. Engage with regional partners.

## **1. Policy Objective:**

Limit or decrease the number of existing STRs.

Set a numeric cap on STR permits countywide.

Set a numeric cap on STR permits in a specified geographic location.

Change the General Plan and Zoning Code and prohibit STRs in some or all residential areas.



## **2. Policy Objective:**

Prevent neighborhood impacts and nuisances.

Retain existing permitting requirements.

Increase violation fees.

Increase compliance staffing.

### **3. Policy Objective:** Discourage business investment in or commodification of housing.

Implement a waiting period before any new property owner can apply for an STR permit.

Prohibit STR permits for a specified period where an eviction has occurred on properties in the previous two years.

Amend language in the code regarding property rights to state STR permits do not run with the land.

Amend definition of short-term rentals of residential properties to include fractional ownership and/or time shares.

Prohibit new STRs.

**4. Policy Objective:** Preserve and encourage availability of workforce housing units.

Require the same approval process for MFR units as SFR units.

Require a minimum STR size (floor area) for new STR permits.

Partner with an organization to create a renter-owner matching program (non-profit, partnership).

**5. Policy Objective:** Increase available bed base without affecting long-term rental availability.

Allow “hosted” STRs and change county definitions and regulations for “occupied” STRs.

Exempt hosted rentals from a permit cap (if adopted) or allow in zones that don’t otherwise allow STRs.

Allow a long-term renter to occupy an ADU on a property while allowing short-term rentals in the main home.

Allow an ADU to be an STR if the main unit is occupied by the owner or a long-term renter.

## **6. Policy Objective:** Encourage development of new workforce housing units.

Publicize the County's pre-approved Accessory Dwelling Unit (ADU) plans.

Highlight State housing laws that ministerially allow 100% affordable housing developments.

Offer loans and/or grants for building or rehabilitating or preserving long-term housing.

Allow one new STR to be permitted for three new workforce housing units, based on the job generation rate.

Partner with Sierra Business Council or create a new position to help housing development applicants through development review and permitting process.

## **7. Policy Objective:**

Adjust to the market and STR trends.

Consolidate STR permitting and tracking and create a universal tracking system.

Collect code compliance data.

Track and report on STR Transient Occupancy Tax revenue.

Track and report on STR permit activity and trends in the County's annual report.

## **8. Policy Objective:**

Create an equitable permitting process.

Consolidate the permitting process into a single unified procedure with a single set of terms and requirements for all permits, regardless of land use designation.

Continue to require annual renewals for all STR Permits.

## **9. Policy Objective:**

Engage with regional partners.

Encourage the Town of Mammoth Lakes to regulate STRs.





549 OLD MAMMOTH ROAD, SUITE 11A PO BOX 1007 MAMMOTH LAKES, CA 93546 760-934-4637 [info@mlbor.com](mailto:info@mlbor.com)

July 14, 2025

Mono County Planning Commission  
PO Box 347  
Mammoth Lakes, CA 93546

**Subject: Response to Request for Identification of Condo Buildings for Short-Term Rental Ban**

Dear Members of the Mono County Planning Commission,

Thank you for the opportunity to continue our productive dialogue regarding the proposed short-term rental regulations in Mono County. We appreciate your consideration of the real estate community's perspective as we work towards solutions that benefit all stakeholders.

Regarding your recent request to identify specific condo buildings that could be set aside for workforce housing, we must respectfully decline this request. Our decision is based on several important professional and legal considerations:

**1) REALTORS®' Role and Liability**

Our primary role as real estate professionals is to facilitate property transactions and provide expert advice on market conditions, property values, and zoning regulations. Directly participating in the determination of land use for specific properties, such as identifying buildings for a short-term rental ban, falls outside the scope of our professional responsibilities and expertise. Such involvement could create significant legal liabilities for us, as it could be construed as overstepping our professional boundaries and interfering with property rights.

**2) Potential for Price Fixing Allegations**

Furthermore, the designation of certain condo buildings for a specific use, such as setting them aside exclusively for affordable housing or banning short-term rentals, could inadvertently lead to accusations of price fixing. If REALTORS® were to participate in such a selection, it could be misconstrued as an attempt to manipulate market values or availability in a way that violates fair housing and anti-trust laws. We are committed to upholding ethical practices and adhering to all legal guidelines in the real estate industry.

**3) Preserving Market Neutrality**

To maintain our neutrality and avoid any perceived conflicts of interest, it is crucial that REALTORS® do not engage in decisions that directly dictate the use or restrict the market access of specific properties. Our expertise lies in understanding the market as it exists and helping clients navigate current regulations, not in shaping or enforcing new ones at a granular level that impacts individual property use.

Finally, while we believe the determination of appropriate land use rests squarely with the Planning Commission and Board of Supervisors, we have deep concerns regarding the way the Planning Commission has approached the issue of short-term rentals within our county. Should such restrictions be implemented we know and can show the deleterious effects of these policies on our economy and local community.

These decisions require comprehensive urban planning expertise, legal review, and public policy considerations that we feel are not being met. It is the recommendation of MLBOR that further consideration of this matter be put on hold until more information can be considered.

We remain committed to collaborating with the Mono County Planning Commission and the Board of Supervisors to find equitable and effective solutions for affordable housing in our communities. We are prepared to offer our insights on market dynamics, the potential economic impacts of various regulations, and how policies might affect property owners and the broader community.

Thank you for your understanding of our position. We look forward to continuing our constructive dialogue.

Sincerely,

Mammoth Lakes Board of REALTORS®

A handwritten signature in black ink, appearing to read 'Karen Nelson', with a stylized flourish extending to the right.

Karen Nelson, President

## Mono County Community Development Department

PO Box 347  
Mammoth Lakes, CA 93546  
760.924.1800, fax 924.1801  
commdev@mono.ca.gov

PO Box 8  
Bridgeport, CA 93517  
760.932.5420, fax 932.5431  
[www.monocounty.ca.gov](http://www.monocounty.ca.gov)

July 16, 2025

Mammoth Lakes Board of Realtors  
PO Box 1007  
Mammoth Lakes, CA 93546

**RE: MLBOR Letter “Response to Request for Identification of Condo Buildings for Short-Term Rental Ban”**

Dear Ms. Nelson:

Thank you for the letter from the Mammoth Lakes Board of Realtors dated July 14, 2025, which was received on July 16. Unfortunately, the request cited in the letter is inaccurate and warrants correction.

On June 13, 2025, the Mono County Planning Commission held a field trip in June Lake to review the different “neighborhoods” identified in the County’s short-term rental (STR) policies and visit several condominium complexes that may become subject to regulation. No mention was made during or after this field trip of identifying complexes that could be set aside for workforce housing or where STRs would be banned.

Instead, at the field trip, the Commission, staff, and the public, mainly June Lake area realtors, had open and productive conversations about how the different condominium buildings are used, sales prices, and percent of STRs vs. long-term residents. At the conclusion, the group discussed that input from the realty community on the “highest priority” condominium complexes to retain as STRs would be useful information as new policies and regulations are considered. A realtor mentioned that all of the condominium complexes are important to the economy as STRs. County staff responded that the realtors could certainly provide that statement, and that more helpful information would be to also include which complexes are the most economically important.

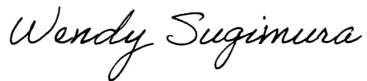
The real estate representatives were receptive to providing information about the highest priority complexes to retain STR eligibility and a general timeline of the end of the month was suggested. In trying to keep policy development on track, Community Development Department (CDD) staff reached out in early July to real estate representatives who were on the field trip and involved in this discussion to follow up. Staff also requested any information that may be available about the number of longer-term renters in each complex and offered to discuss further.

Given that this collaborative follow-up was so highly misinterpreted, the CDD is respectfully disengaging from the conversation that began at the field trip. Further, while we appreciate MLBOR’s commitment to

collaborating on “equitable and effective solutions for affordable housing in our communities,” the STR policies do not directly address the provision of affordable housing. The two issues should not be conflated as STR regulations are a separate policy matter from affordable housing strategies, and the subjects are handled by different departments and staff within the County.

Thank you for this opportunity to provide corrections and clarifications.

Sincerely,

A handwritten signature in black ink that reads "Wendy Sugimura". The script is cursive and fluid.

Wendy Sugimura, Director  
Community Development Department

Cc: Mono County Board of Supervisors  
June Lake Citizens Advisory Committee  
Jack Greacen  
Kelly Starrett  
Sandra Moberly, Mono County CAO  
Chris Beck, Mono County Counsel  
Emily Fox, Mono County Counsel  
Community Development Department staff



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July 22, 2025

Board of Supervisors & Planning and Zoning Committee  
C/O: Wendy Sugimura  
Mono County Community Development Department  
P.O. Box 347  
Mammoth Lakes, CA 93546

Re: Clarifications in Your July 16 Response

Dear Wendy,

Thank you for your letter of July 16, 2025, clarifying the County's intent following the June 13 field trip in June Lake. We appreciate the time you have invested in explaining the basis for your follow-up, and we welcome the opportunity to ensure our communications remain aligned as policy development proceeds.

### 1. Clarifications

We respect your view that the Commission's interests were limited to gathering real-world data on which condominium complexes contribute most to the local economy when operating as short-term rentals. However, we have multiple members with one-on-one experiences with Planning Commission members and Board of Supervisors where-in condominium complexes would be "set aside for affordable housing" or "retain their STR." In whatever way it is described the meaning does not change and it is a frivolous debate of semantics.

### 2. Conflict-of-Interest Concerns Remain

Even with this clarification, we must reiterate that asking REALTORS® to identify "highest priority" complexes for any form of regulatory preference—whether retention of STR eligibility or future restrictions—places our members in difficult and potentially liable positions. Our obligation is to provide objective market insight, not to advocate for or against properties. We continue to believe that maintaining a clear separation between policymaking and private commercial interests is critical to preserve public confidence and avoid the appearance of bias.

### 3. Next Steps and Process Concerns

In reflection of the previous efforts by the Planning Commission, and to move forward constructively, we have:

- **Conducted Research:** Working with an independent third party to conduct a community sentiment survey of the hypothetical STR policies Mono County is considering.
- **Scheduled a Public Town Hall:** The Mammoth Lakes Board of REALTORS® will host a town hall on August 12, 2025. We invite the Board of Supervisors, Planning Commission, and you and your staff to join us to understand the impact STR policies have on destination communities like Mono County.

#### 4. STR Policy and Affordable Housing

While we agree that STR regulation and affordable-housing strategy can be distinct policy arenas, Mono County has a history of denying STR permits citing affordable housing needs. That said, both subjects profoundly affect the community and local economy. As previously stated, we stand ready to collaborate with the County and other stakeholders to develop complementary approaches that support long-term residents without undermining our vital visitor economy.

In closing, we respect that you have been tasked with helping get an STR policy passed by the end of the year. However, the loose way the county has approached this issue and the lack of verifiable data justifying its conclusions raises concerns about whether everyone understands the broad implications these policies will have on our communities. By working together—grounded in clear process, neutral data collection, and open public dialogue—we can craft policies that are balanced, effective, and equitable.

Respectfully,



Karen Nelson, President  
Mammoth Lakes Board of REALTORS®

cc: Mono County Board of Supervisors  
Chris Beck, Mono County Counsel  
Sandra Moberly, Mono County CAO  
June Lake Citizens Advisory Committee  
MLBOR Community Development Subcommittee

Mammoth Lakes Board of REALTORS®

# Workforce | Housing Incentive Strategies

Mono County, California

Prepared by SMR Development, LLC and Agnew::Beck Consulting

August 14, 2025



## Research Memo

Date: August 14, 2025

Prepared for: Mono County Board of Supervisors

Prepared by: SMR Development, LLC and Agnew::Beck Consulting

### Purpose

This memo is provided as an attachment to the staff report on proposed updates to Mono County's Short-Term Rental (STR) Policies and Regulations. It presents a high-level summary of successful policies incentive programs from peer communities that are actively addressing workforce housing shortages. These findings are intended to inform the Board's consideration of potential STR-related incentive programs, particularly whether leveraging STR permitting to directly require or incentivize new workforce housing units should be considered. The findings aim to assist in aligning broader strategies with housing goals in the General Plan.

### Background and Context

Mono County, like many rural mountain communities, faces a persistent and well-documented shortage of affordable and workforce housing. While STRs have become part of the regional housing conversation, the drivers of housing scarcity—limited inventory, rising home prices, construction barriers, and labor constraints—predate the growth of the STR market.

In its 2022–2024 Strategic Plan Update, Mono County identified “A Thriving Economy” as a core focus area. Among the actions proposed were:

- Hiring a Housing Opportunity Manager
- Developing a multi-year housing strategy
- Identifying sustainable funding sources
- Incentivizing the development and preservation of workforce housing

The County's General Plan Land Use Element also commits to exploring supportive roles for staff, partnerships, and permitting strategies via Objective 1.D and Policies 1.D.7–1.D.9.

This memo supports those efforts by examining replicable models and practical policy tools from other jurisdictions. The intent is to inform the design of targeted, effective housing incentive programs for Mono County—some of which may be tied to STR policies, others that function independently.

### Overview

SMR Development, LLC (SMR) was hired to provide a high-level summary of research from other similar communities addressing workforce housing as a supplement to the staff report on proposed changes to the Short-Term Rental Policies and Regulations document, a chapter in the Mono County General Plan, Land Use Planning Element. SMR was asked to describe the mechanisms by which other jurisdictions are using STRs to incentivize desired development



types as well as make a recommendation on whether or how to use the permitting of STRs as an incentive to provide additional workforce/community housing based on information provided in existing area studies and based on SMR's professional opinion.

The team reviewed the following documents and information:

- *2024 Mono County Short-Term Rental Study* conducted by BAE and MIG
- *2022-2024 Mono County Strategic Plan Update*
- Review of the Short-Term Rental Policies and Regulations chapter of the Mono County General Plan, Land Use Plan Element
- Discussions with planning staff and review of Board conversations about STR policy from previous meetings
- Discussions with housing staff in mountain resort towns

### **Relevant Proposed Policy Amendments to the Mono County General Plan**

Goal 1: Maintain and enhance the environmental and economic integrity of Mono County while providing for the land use needs of residents and visitors.

**Objective 1.D: Provide for the housing needs of all resident income groups, and of part-time residents and visitors.**

-Policy 1.D.7: Explore partnerships or create a staff position to assist housing applicants through permitting and development review.

-Policy 1.D.8: Research owner-renter matching programs and evaluate their effectiveness in comparable jurisdictions.

-Policy 1.D.9: Develop incentive programs linking short-term rental permits to the creation of affordable units. Pilots should not exceed permit caps, especially in June Lake, and must be adaptable to market needs.

### **Research Summary and Assumptions**

Based on our review of best practices and our experience supporting rural and resort-region housing strategies across the West, we offer the following guiding assumption:

Mono County should not rely solely on STR policy as a mechanism to solve affordable and workforce housing challenges. STRs are one factor among many that cause housing challenges in Mono County. The County's current regulations place the County among the more restrictive jurisdictions for STRs in residential zones.

Additionally, per the *2024 Mono County Short-Term Rental Study*, the majority of the STRs are in one area, thus STR policy should be strategic to address the challenge in that area, versus

throughout the County. The policy focus should be on regulating STRs in particular areas.

Instead, effective workforce housing solutions in similar communities have come from investments in staff capacity, sustained funding sources (including STR-generated tax revenue), and broad-based housing programs. The following examples illustrate programs that have been created elsewhere:

**Table 1: Summary of a STR Incentive Related Program**

Program	Jurisdiction	Type	Description	Outcomes	Considerations
STR Token Program	Town of Truckee	Developer incentive	Exchange STR "tokens" for deed restrictions	Not currently in use	Paused for evaluation

STR Token Program (Truckee) was a Pilot Program that was approved in September 2023 and intended to incentivize the creation of Workforce Housing Units by offering in-kind payment for Deed Restrictions in the form of "Tokens." The Token was redeemable for Transient Occupancy Registration Certificates (Certificates), which are required in Truckee to short-term rent a property. Participants in the program were supposed to deed-restrict the workforce housing units for a 15-year term.

Although this program aimed to incentivize workforce housing units by allowing STRs, similar to what has been discussed in Mono County, the program seemingly has not been successful. According to Town of Truckee staff the program has not garnered interest from developers, possibly because it is not straightforward, it is too complicated, and developers do not see it as being valuable or feasible. It could also be that often STR owners are not necessarily housing developers – in other words there may not be a lot of housing developers focused solely on creating STRs, instead perhaps they are trying to create revenue on their second home. Data on the program is not available because it has never actually been utilized.

**Table 2: Summary of Programs Incentivizing Long-Term Rentals**

Program	Jurisdiction	Type	Description	Outcomes	Considerations
Lease to Locals (run by Placemate - more information can be found at <a href="http://placemate.com">placemate.com</a> )	Town of Truckee	Homeowner incentive	Grants to homeowners who rent to local workers (up to 150% AMI)	224 homes converted; 552 people housed	Company built as an alternative to short-term renting. Short-term impact; requires funding
Lease to Locals (run by Placemate - more information can be found at <a href="http://placemate.com">placemate.com</a> )	Town of Mammoth Lakes	Homeowner incentive	Grants to homeowners who rent to local workers (up to 150% AMI)	12 properties converted; 37 people housed (as of 7.1.2025)	Short-term impact; requires funding

The Lease to Locals incentive program unlocks short-term rentals and vacation homes for long-term leases for members of the local workforce. Launched in 2019 in Truckee-Tahoe, Placemate was founded to respond to the desperate need for locals housing in mountain resort communities. The company utilizes platforms like Property Radar to market programs to second homeowners, offering incentives to convert their underutilized home to long-term rental. Incentives vary, based on the number of ‘qualified tenants’ that are placed in the home, and range from \$4,500 to \$18,00 annually for long-term (12+month) rentals. The program has been hugely successful and currently operates in ten different markets throughout the United States. While the program has sometimes been seen as a ‘band-aid’ program while longer-term solutions such as development are pursued, communities like Truckee have used the program as a launch pad to additional programs like the Rooted Renters program, which incentivizes homeowners who have historically rented to locals (vs. vacation rental) and want to continue to (with some financial support).

**Table 3: Summary of Deed Purchase Type Workforce Housing Incentive Programs**

It is notable that all the programs listed below are funded with local dollars (transient occupancy, general fund, bond measure funding) with the exception of the ADU loan which is funded via a state of California program. Additionally, most of the programs are designed to serve the local workforce including those whose incomes are higher than 80% AMI, who are not served by traditional low-income and affordable housing programs which generally focus on 60% AMI and below.

Program	Type of Incentive	Jurisdiction	Type	Description	Outcomes	Considerations
ADU Program	Loans and Mini-Grants	Town of Truckee	Homeowner incentive	Loans + pre-approved ADU plans + staff navigation support services	21 ADU mini-grants awarded, 6 ADU loans have been awarded	High costs of construction in resort area have limited effectiveness
Developer Deed Restriction Purchase Program	Grant	Town of Truckee	Developer incentive	Town pays ~16% of unit value for 55-year deed restriction, up to \$150K per door	13 deed restrictions secured since 2024 program launch	Lowers cost of new construction and financing benefits
Launch Pad, Developer Deed Purchase Program	Grant	Placer County	Developer incentive	Placer pays ~16% of unit value for 55-year deed restriction, up to \$200K per door	Launched in 2025 applications in process	Positive developer feedback
Vail InDEED Program, Deed Purchase Program	Grant	Summit County	Homeowner and Developer incentive	Pay homeowner and/or developers 15-20% of fair market value of the home	176 units since 2018, \$12M investment to-date (60% rental, 40% ownership units)	Model for many communities requires significant investment including monitoring program

## Conclusion

Short-term rental (STR) regulation continues to be an important component of Mono County's broader housing policy framework—but it is not a standalone solution to the County's workforce housing challenges. The County has established a strong regulatory foundation, with some of the most comprehensive STR permitting requirements in the region. This has helped maintain neighborhood character, limit nuisances, and ensure fair taxation. However, as documented in the 2024 STR Study and in successful models from peer communities, the underlying causes of workforce housing scarcity extend well beyond STR activity.

Our experience and research finds the most effective workforce housing incentives do not rely on exchanging STR permits for new housing development. That approach—tested in Truckee—is proving limited and has not produced measurable housing outcomes in the two years the program has been in place. In contrast, programs offering direct incentives such as grants to homeowners, loans for ADU development, and purchase of deed restrictions from developers have successfully delivered units and housed workers. These tools are getting results but have a cost.

Mono County has a clear opportunity to shift focus toward these proven approaches. This includes hiring a full-time Housing Opportunities Manager, establishing a dedicated housing incentive fund, and piloting programs that match the needs of local communities. These strategies will be most effective when implemented alongside—but not dependent on—STR regulations.

In summary, while STR regulation helps support community stability, the County must continue to invest in broader, long-term housing solutions. Staff capacity, sustained funding, and practical incentive programs—not permit-based exchanges—are the levers that will drive meaningful progress toward Mono County’s workforce housing goals.

## Attachment 2



R25-01

**A RESOLUTION OF THE MONO COUNTY PLANNING COMMISSION  
RECOMMENDING ADOPTION OF GENERAL PLAN AMENDMENT (GPA) 25-01 AND  
MODIFICATION OF MONO COUNTY CODE (MCC) CHAPTER 5.65 AMENDING  
POLICIES, REGULATIONS, AND STANDARDS FOR SHORT-TERM RENTALS;  
MAKING THE REQUIRED FINDINGS; AND FINDING THAT THE PROJECT  
QUALIFIES AS AN EXEMPTION UNDER CEQA §15301 (EXISTING FACILITIES)**

**WHEREAS**, Mono County enacted an emergency moratorium on new short-term and transient rentals in single-family residential units in all land use designations (ORD22-03 and ORD22-05) from May 3, 2022, to April 29, 2024, to study the impacts of short-term rentals on long-term housing for residents; and

**WHEREAS**, during the moratorium, the County completed the “Mono County Short-Term Rental Housing Study” (February 12, 2024); an online survey of impacts to housing and potential solutions and options (December 21, 2023, to February 1, 2024); and public input through the Regional Planning Advisory Committees (RPACs) in March 2024, including meetings in the Antelope Valley, Bridgeport Valley, Mono Basin, June Lake, and Long Valley, and a workshop with the Planning Commission (March 21, 2024); and

**WHEREAS**, data, information, and analysis were presented to the Board of Supervisors at public meetings in 2024 on February 20, April 2, April 16, and June 18; and

**WHEREAS**, at those meetings, the Board received public input; discussed potential changes to policies, regulations, and standards; and provided direction regarding policy amendments; and

**WHEREAS**, a resolution providing direction for processing short-term and transient rental permits while new policies and regulations were under development (R24-038) was adopted by the Board of Supervisors on April 16, 2024; and

**WHEREAS**, revised policies, regulations, and standards were developed based on the foregoing work and Board direction; and

**WHEREAS**, tribal consultation was invited pursuant to Senate Bill 18 and public input was received on the proposed revised policies, regulations, and standards in May 2025 at the RPACs

(Antelope Valley, Bridgeport Valley, Mono Basin, June Lake, Long Valley) and Planning Commission (May 15, 2025); and

**WHEREAS**, the Planning Commission toured June Lake on June 13, 2025, to visit short-term rental neighborhoods and better understand local character and issues; and

**WHEREAS**, the purpose of the revisions to the Mono County General Plan and County Code Chapter 5.65 are to 1) prioritize personal residential use in residential units, regardless of land use designation; 2) continue to support a “sharing model” whereby a resident property owner with excess capacity may supplement his/her income, which is different from purchasing assets with the primary intent of generating income; 3) prevent the loss of residential housing to a visitor lodging business model; and 4) prevent the commodification of residential housing due to the inclusion of an income-generating use like visitor rentals, however indirectly, in the sales price; and

**WHEREAS**, alternatives and options in response to public comment and opposition were identified, evaluated, considered, and incorporated as directed; and

**WHEREAS**, the amendments proposed would be consistent with a Class 1 Categorical Exemption under §15301 (Existing Facilities) of the California Environmental Quality Act because short-term rentals involve no expansion of existing or former use in residential units and are therefore unlikely to result in environmental impacts on neighborhoods.

**NOW, THEREFORE, THE MONO COUNTY PLANNING COMMISSION DOES HEREBY RESOLVE AS FOLLOWS:**

**SECTION ONE:** The Planning Commission initiates General Plan Amendment 25-01 amending policies, standards, and regulations for short-term rentals, and modifications to Mono County Code (MCC) Chapter 5.65. The proposed amendments are attached as Exhibit A.

**SECTION TWO:** Having reviewed and considered all information presented, including the staff report, white paper, presentation, and public comments received during the comment period and hearing, the Planning Commission recommends that the Board of Supervisors finds that the proposed amendments are consistent with a Class 1 Categorical Exemption under §15301 of the California Environmental Quality Act (CEQA). Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use. Visitor rentals are used in a manner not substantially different from occupancy by full-time residents, whether owners or long-term renters and will be subject to Mono County Code (MCC) Chapter 5.65, which addresses aesthetics, noise, parking, utilities, and other concerns. Whether a unit is used for long-term or short-term/nightly occupancy does not change or expand the residential activities occurring on the property, which includes sleeping and eating. Thus, use of a residential unit on a short-term basis is not more intensive than the conversion of a single-family residence to office use.

**SECTION THREE:** Having reviewed and considered all information presented, including the staff report, white paper, presentation, and public comments received during the comment period and Public Hearing, the Planning Commission recommends that the Board of Supervisors incorporate the following policy alternatives into the proposed amendments to the General Plan and MCC Chapter 5.65:

**Placeholder:** Insert any policy alternatives selected for Issues 1A, 3G&H, 4L, or 6Q.

**SECTION FOUR:** Having reviewed and considered all information presented, including the staff report, white paper, presentation, and public comments received during the comment period and Public Hearing, the Planning Commission recommends the Board of Supervisors approve General Plan Amendment 25-01, modified by any policy alternatives set forth in Section Two, finding that:

A. The proposed amendment to the text is consistent with this General Plan.

The countywide General Plan directs Mono County to retain existing housing stock and increase the supply of housing. The Housing Element recognizes that the demand for short-term rentals is a constraint on the supply of long-term housing. The amended land uses policies encourage the retention and development of residential housing units, which is consistent with the following Housing Element goals and policies:

*Goal 1: Increase Overall Housing Supply, Consistent with County's Rural Character.*

The amended land use policies encourage Mono County to explore partnerships that would support housing developments through the permitting process and provide incentives that leverage short-term rentals permits in exchange for new housing units. Mono County will consider how the housing market conditions and regulatory approaches in nearby jurisdictions affect the balance of residential unit availability for long-term use and encourage peer jurisdictions to regulate short-term rentals to increase the overall supply of housing.

*1.9. Continue to allow for residential development in the commercial land use designation and approve at least one mixed-use development to more efficiently and economically utilize the county's limited land base for housing.*

The amended land use policies prefer that new construction for visitor lodging is built to commercial lodging standards and in an appropriate land use designation. New residential units should not be constructed for the sole purpose of visitor lodging.

*Goal 3: Retain Existing Community Housing.*

The amended land use policies require two discretionary approvals for all short-term rentals regardless of the land use designation. Existing long-term rentals and former short-term rentals may be retained as community housing through the permitting process.



1 *3.5. Identify incentives for property owners to convert short-term rentals into long-term*  
 2 *rentals, invite all short-term rental property owners to participate, and convert at least one*  
 3 *unit.*

4 The amended land use policies encourage Mono County to research owner-renter matching  
 5 programs to incentivize the conversion of short-term rentals to long-term rentals.

6 **B. The proposed amendments to the text of area plans are consistent with the countywide**  
 7 **General Plan.**

8 The amendments to the text of area plans align STR nomenclature with the terms proposed  
 9 in the countywide policy modifications. One change reflects a past decision and direction  
 10 from the Board to discourage STR applications on Skyline Drive in June Lake due to  
 11 safety/infrastructure conditions referenced in Countywide Action M.1.3.a.

12 **SECTION FIVE:** Having reviewed and considered all information presented, including the  
 13 staff report, white paper, presentation, and public comments received during the comment period  
 14 and Public Hearing, the Planning Commission recommends that the Board of Supervisors adopt  
 15 amendments to Mono County Code Chapter 5.65, as modified by any policy alternatives set forth in  
 16 Section Two.

17 **PASSED AND ADOPTED** this 21<sup>st</sup> day of August, 2025, by the following vote:

18 AYES:

19 NOES:

20 ABSENT:

21 ABSTAIN:

22 \_\_\_\_\_  
 23 Chris Lizza, Chair  
 24 Mono County Planning Commission

25 Attest:

26 Approved as to form:

27 \_\_\_\_\_  
 28 Heidi Willson  
 29 Secretary to the Planning Commission

30 \_\_\_\_\_  
 County Counsel

## Planning Commission R25-01: Exhibit A

### I. ISSUES/OPPORTUNITIES/CONSTRAINTS

This section identifies and analyzes issues, opportunities and constraints that affect the future development potential of the county's unincorporated areas. This section also summarizes the issues, opportunities, and constraints pertaining to land use in each of the Area Plan areas, and for the Bridgeport and Lee Vining Airport Land Use Plans (ALUPs). Many of the environmental constraints governing development are addressed in the Conservation/Open Space Element; this section of the Land Use Element summarizes those concerns in light of their relevance to the development of land use policies. Issues pertaining to the Mammoth Lakes Airport Land Use Plan are discussed in detail in those documents.

#### COUNTYWIDE ISSUES/OPPORTUNITIES/CONSTRAINTS

[...]

23. As of the 2020 census, 32.8% of Mono County's housing stock was considered a vacation home (e.g., not a primary residence). Short-term rentals in ~~single-family residential areas~~ units meet a tourism market need and can provide ~~have the potential to utilize~~ existing units for additional visitor accommodations, rather than units remaining vacant and not contributing to the local economy. ~~As of the 2020 census, 32.8% of Mono County's housing stock was considered a vacation home. According to census data, Mono County has the second highest vacation home ownership percentage of counties in the state.~~

~~24. The county commissioned an in-depth study to analyze the relationship between short-term rentals (STRs) and housing availability in the county in June of 2023.~~

~~25. Community outreach done as a part of the STR short term rental study included focus groups with more than 20 individual stakeholders in the county, as well as a separate survey to a county wide audience conducted by county staff.~~

256. Concerns related to the STR short-term rental study included a sense of urgency around lack of housing, a request for community-specific solutions, and a sense that the proper balance between housing and rental needs must be met.

267. The County conducted an in-depth analysis of the relationship between short-term rentals and housing availability in a 2024 study. Due to small sample size, empirical evidence regarding whether visitor rental permits cause an increase in unit sale prices could not be identified in the Mono County Short Term Rental Study published in 2024; however, the study did indicate that higher numbers of visitor rental permits do drive up the price of housing, and anecdotal evidence suggests visitor rental permits increase the property value of the visitor rental parcel.

24. Community outreach done as a part of the short-term rental study included focus groups with nearly 18 individual stakeholders in the county, as well as a separate survey to a county-wide audience conducted by county staff.

#### COUNTYWIDE LAND USE POLICIES

**GOAL 1. Maintain and enhance the environmental and economic integrity of Mono County while providing for the land use needs of residents and visitors.**

**Objective 1.D.** Provide for the housing needs of all resident income groups, and of part-time residents and visitors.

**Policy 1.D.7.** The County will explore the potential to partner with an existing program or organization or develop a staff position to help housing development applicants through the development review and permitting process.

**Policy 1.D.8.** The County will research opportunities for an owner-renter matching program and evaluate the success of such programs in similar jurisdictions.

**Policy 1.D.9.** The Mono County housing program will continue to implement the housing strategy which may include ~~Housing Opportunities Manager may develop one or more incentive program(s)~~ that link the development of affordable housing units with the approval of ~~an STR short-term rental permit or other unrelated incentives to build community housing in June Lake.~~ Any programs including STR permitting should ~~The County may adopt one or more pilot programs provided the overall objective focuses on developing workforce housing and remain under the overall STRovernight rental~~ STR permit cap authorized under the County Code ~~is not exceeded in June Lake.~~ The County may adjust and refine the programs as needed to reflect market conditions and community considerations.

**Objective 1.M.** Regulations and ongoing monitoring of ~~short-term rentals of residences visitor rentals in~~ in all residential land use designations ~~(e.g., SFR, ER, RR, or RMH, excluding MFR M and MFR H)~~ are needed to protect residential neighborhood character and quality of life, as well as capture potential benefits to the extent possible.

**Policy 1.M.1.** Approvals of ~~Owner-OccupiedHosted and Not Owner-OccupiedNon-Hosted short-term rental operations~~ STR Activity Permits ~~rental activity permits pursuant to Mono County Code Chapter 5.65~~ shall be specific to the property owner and non-transferrable. Sale or transfer of the property renders the approval to operate the rental null and void.

**Action 1.M.1.a.** The ~~following~~ permits ~~are~~ required to operate ~~Owner-OccupiedHosted and Not Owner-OccupiedNon-Hosted~~ a short-term rentals include, but are not limited to: 1) a Use Permit pursuant to Chapters 25 and 3225, and 2) an Short-Term Rental (STR) Activity Permit pursuant to Mono County Code Section-Chapter 5.65, which shall be. ~~The STR Activity Permit shall be~~ specific to the property owner and non-transferrable, ~~3) a valid business license, and 4) a Transient Occupancy Tax (TOT) certificate, and 5) any other applicable regulations or laws.~~

**Policy 1.M.2.** Short-term rentals in ~~single-family residential neighborhoods~~ residential units, regardless of land use designation, ~~ees~~ should support a model for the supplemental sharing of excess assets, rather than a full business or investment model.

**Action 1.M.2.a.** Only the property owner may apply for a short-term rental use permit, and the owner is the party directly responsible for the management of the unit.

**Action 1.M.2.b.** Short-term rental permits shall be limited to one per person or entity and one per parcel.

**Action 1.M.2.c.** New construction intended for visitor lodging should be constructed to commercial lodging standards in an appropriate land use designation. In other words,

constructing a residential unit for the purpose of visitor lodging is viewed unfavorably by the County and may misrepresent the use of the property as well as potentially circumvent the California Building Code.

**Policy 1.M.3.** In addition to reasonable opposition by the neighborhood, short-term rental applications may be denied in neighborhoods with certain safety and/or infrastructure characteristics that are not compatible with visitor use, or where conflicts with other regulations exist.

**Action 1.M.3.a.** Short-term rental applications may be denied where one or more of the following safety or infrastructure conditions exist:

- Emergency access issues due to a single access point to/from the neighborhood (see Safety Element, Objective 5.D. and subsequent policies, and Land Use Element 04.180).
- Access to the parcel, in whole or part, includes an unimproved dirt road (e.g., surface is not paved or hardened with a treatment) and/or roads are not served by emergency vehicles.
- The majority of parcels in a neighborhood/subdivision are substandard or small (less than 7,500 square feet), potentially resulting in greater impacts to adjacent neighbors and/or changes to residential character.
- Current water or sewer service is inadequate or unable to meet Environmental Health standards.

**Action 1.M.3.c.** Opposition by a Homeowner's Association (HOA) Board on a short-term rental application shall be considered and may constitute reasonable neighborhood opposition. The HOA Board should send a Board-approved comment letter on the project to the County prior to the public hearing or testify at the hearing.

**Action 1.M.3.d.** Uses on federal lands (e.g., Forest Service cabins) are governed by federal regulations; however, these rentals are required to comply with County transient occupancy tax requirements.

**Policy 1.M.4.** To support the tourist economy, short-term rentals are allowed in a limited form, and additional opportunities may be explored.

**Action 1.M.4.a.** Support an even playing field, e.g., equitable regulations and taxation, between hotels/motels and short-term rentals to support existing commercial lodging facilities.

**Policy 1.M.5.** Expand the enforcement effort to be more proactive, comprehensive, and include a larger suite of tools and methods, subject to County resource availability and legality.

**Action 1.M.5.a.** Implement an education campaign regarding short-term rentals, which may include a flier in property tax bills or other County mailings/communications, posting regulations on hosting websites (e.g., Airbnb's "Responsible Hosting" webpage), refocus the County's related webpage, information via Mono County tourism marketing and the Chamber of Commerce, and local media articles.

**Action 1.M.5.b.** Consider providing for a private right of action for property owners within 100' of a short-term rental, similar to the City and County of San Francisco, which may be resolved in small claims court and does not provide for attorneys' fees recovery.

**Action 1.M.5.c.** ~~Provide an~~ Maintain the anonymous reporting hotline for illegal rental activity and complaints.

**Action 1.M.5.d.** The County shall, resources permitting, invest in technology, systems, and services to support identification of violations, tracking, enforcement actions, and other compliance issues.

**Action 1.M.5.e.** The County shall, within legal constraints, coordinate information between departments such as Community Development, Environmental Health, Tax Collector, Sheriff, and Assessor to ensure comprehensive permitting, taxing, approvals, and enforcement.

**Policy 1.M.6.** Consider how local market conditions and policy regulatory approaches taken in nearby areas affect the balance of rental unit availability and long-term housing.

**Action 1.M.6.a.** Consider amending the definition of “short-term rental” to include residences utilized as timeshares or co-owned vacation homes (i.e., the Pacaso vacation home model). ~~Consider amending the definition of Short Term Rental’s to include residences that are fractionally owned by several individuals or a business entity, thereby requiring use permits and STR activity permits for these residences.~~

**Action 1.M.6.b.** Encourage adjacent and nearby jurisdictions such as the Town of Mammoth Lakes, the City of Bishop, and Inyo County to regulate short-term rentals.

~~**Policy 1.M.7.** New construction intended for visitor lodging should be constructed to commercial lodging standards in an appropriate land use designation. In other words, constructing a residential unit for the purpose of visitor lodging is viewed unfavorably by the County.~~

## **Mono Basin**

**GOAL 10.** **Maintain the spectacular natural values of the Mono Basin and rural, small-town character of communities by managing growth, ensuring high-quality aesthetics, and providing for community development needs to enhance the quality of life for residents.**

### **Objective 10.B.**

Manage buildout of the Mono City subdivision to retain its rural character.

**Policy 10.B.1.** Limit the buildable area of Mono City to the existing subdivision footprint.

**Action 10.B.1.a.** Coordinate with the BLM to ensure the next update of the Bishop Resource Management Plan reflects the agreement to remove APN 019-110-010 from the BLM disposal list.

**Policy 10.B.2.** Prohibit all types of short-term rentals that may be permitted under Chapter 25 in Mono City.

## **June Lake**

**GOAL 13.** **That June Lake ultimately develop into a moderately sized, self-contained, year-round community.**

## Planning Commission R25-0

**Objective 13.M.** To balance the character of single-family residential neighborhoods and the tourist economy, utilize a mix of best practices, creative solutions, and regulatory mechanisms, as guided by public input and engagement, to address the complexity of short-term rentals.

**Policy 13.M.1.** ~~Short-term~~ Visitor rentals are subject to Chapter 25 of the General Plan Land Use Element and Mono County Code Chapter 5.65, with the following specifications based on the context of individual neighborhoods (see General Plan map), which vary in character.

~~**Action 13.M.1.a.** Not Owner-Occupied Non-hosted short-term rentals are prohibited throughout June Lake in residential land use designations (e.g., SFR, ER, RR, or RMH) except in specified locations (see below).~~

~~**Action 13.M.1.ab.** Owner-Occupied Hosted and Non-Hosted short-term rentals, which are specific to the owner/non-transferrable~~ (pursuant to Mono County Code Chapter 5.65), may be permitted in specific locations (see below). For areas not listed, both Hosted and Non-Hosted short-term rentals may be considered through the required permitting process.

**Action 13.M.1.be.** Prohibit ~~Owner-Occupied~~ Hosted and ~~Not-Owner-Occupied Non-Hosted~~ rentals in the ~~Williams Tract and Petersen Tract~~ and residential land use designations in the Williams Tract. See action Action 1.M.2.c. regarding visitor rentals on CL parcels in the Williams Tract.

**Action 13.M.1.cd.** Defer short-term rental housing decisions for the Highlands to the appropriate tract map and specific plan procedures.

**Action 13.M.1.de.** No public input was received from the Dream Mountain neighborhood, and therefore short-term rentals may be permitted subject to the countywide discretionary permit(s) for short-term rentals.

**Action 13.M.1.ef.** In the Clark Tract, ~~Owner-Occupied~~ Hosted and ~~Not-Owner-Occupied Non-Hosted~~ rentals may be permitted year-round on Nevada Street and ~~/~~ Silver Meadow Lane subject to the discretionary permit(s) for short-term rentals and June Lake Area Plan policies. In the rest of the Clark Tract, only ~~Owner-Occupied~~ Hosted rentals may be permitted subject to the discretionary permit(s) for short-term rentals, June Lake Area Plan policies, and the following additional requirements: summer only (April 16 through October 31), the number of approvals shall be limited to eight parcels total (3% of existing parcels) including existing Transient Rental Overlay Districts (TRODs), the overall visitor rental cap for June Lake set forth in Mono County Code Chapter 5.65 also applies, and ~~Not-Owner-Occupied Non-Hosted~~ rentals are prohibited. See MCC Chapter 5.65 for other operational requirements specific to the Clark Tract.

**Action 13.M.1.fg.** In the South 158 neighborhood, ~~Not-Owner-Occupied Non-Hosted~~ rentals are prohibited. The ~~CAC June Lake Citizens Advisory Committee~~ was evenly split on ~~Owner-Occupied~~ Hosted rentals, and therefore ~~Owner-Occupied~~ Hosted rentals may be permitted subject to discretionary permit(s) for short-term rentals and June Lake Area Plan policies.

**Action 13.M.1.gh.** ~~Owner-Occupied~~ Hosted and ~~Not-Owner-Occupied Non-Hosted~~ rentals may be permitted in the Leonard Avenue neighborhood subject to discretionary permit(s) for short-term rentals and June Lake Area Plan policies. Overnight Short-term rentals applications are discouraged on parcels accessed from Skyline Drive due to safety/infrastructure conditions referenced in Countywide Action M.1.3.a.



**Action 13.M.1.h.i.** The Rodeo Grounds development could potentially be an appropriate location for short-term rentals, and the opportunity should be explored.

### **Long Valley**

**GOAL 23. Maintain the rural residential character of the Long Valley communities (i.e., Long Valley, McGee Creek, Crowley Lake/Hilton Creek, Aspen Springs, and Sunny Slopes) in a manner that provides for commercial uses to serve community needs, and that protects the area's visual, recreational, and natural resources.**

#### **Objective 23.B.**

Maintain, protect and enhance the quality and livability of community areas.

**Policy 23.B.1.** Preserve and enhance existing single-family residential uses.

**Action 23.B.1.d.** Prohibit ~~not-owner-occupied~~ Non-Hosted short-term ~~short-term~~ rentals (see Chapter 25) in the Long Valley Planning Area.

### **Wheeler Crest**

**GOAL 24. Retain, as nearly as possible, the character and quality of life presently enjoyed in the community.**

#### **Objective 24.A.**

Prevent incompatible or conflicting uses within the Wheeler Crest community.

**Policy 24.A.3.** Retain the rural residential character of the entire study area.

**Action 24.A.3.f.** Prohibit all types of short-term rentals that may be permitted under Chapter 25 in the Wheeler Crest Planning Area.

### **Paradise**

**GOAL 25. Retain the natural, aesthetic, environmental and lifestyle qualities valued by residents as part of a rural community surrounded by healthy wildlands.**

#### **Objective 25.B.**

Retain a quiet, peaceful and tranquil residential atmosphere within the community.

**Policy 25.B.3.** Prohibit ~~not-owner-occupied~~ Non-Hosted short-term ~~short-term~~ rentals (see Chapter 25) in the Paradise Planning Area.

### **Tri-Valley**

**GOAL 26. Preserve the rural and agricultural character of the Tri-Valley area.**

#### **Objective 26.A.**

Integrate compatible residential development into the existing community character in Benton.

**Policy 26.A.1.** Allow for the continuation of growth in Benton in a manner that promotes and protects its rural and agricultural character.

**Action 26.A.1.i.** Prohibit ~~not-owner-occupied~~ Non-Hosted short-term ~~short-term~~ rentals (see Chapter 25) in Benton.

**Objective 26.B.**

Preserve the agricultural character of the Hammil Valley.

**Policy 26.B.1.** Protect agricultural uses from the encroachment of incompatible land uses.

**Action 26.B.1.e.** Prohibit ~~not-owner-occupied~~ Non-Hosted short-term ~~short-term~~ rentals (see Chapter 25) in Hammil Valley.

**Objective 26.C.**

Integrate additional compatible development into the existing community of Chalfant.

**Policy 26.C.1.** Allow for the continuation of growth in Chalfant in a manner that promotes and protects its rural and agricultural character.

**Action 26.C.1.f.** Prohibit ~~not-owner-occupied~~ Non-Hosted short-term ~~short-term~~ rentals (see Chapter 25) in Chalfant Valley.

**NOTE: Antelope Valley and Bridgeport have no community-specific STR policies.**



## Commercial Lodging, Moderate (CL-M) and High (CL-H)

**INTENT:** The “CL-M” designation is intended to provide commercial lodging units for short-term occupation in or near residential uses.

The “CL-H” designation is intended to provide short-term commercial lodging units in close proximity to commercial/recreational centers.

### PERMITTED USES

- Single-family dwelling (manufactured homes are not permitted)
- Duplexes and triplexes
- Accessory buildings and uses<sup>1</sup>
- Animals and pets (see Animal Standards Section 04.270)
- Home occupations (see Home Occupation regulations, Section 04.290)
- Transitional and Supportive Housing including Single Room Occupancy facilities<sup>5</sup>
- Outdoor cultivation of a maximum of six mature and 12 immature cannabis plants under the Compassionate Use Act
- ~~Transient rentals (rentals for fewer than 30 consecutive days), limited to one unit per individual in any land use designation in Mono County in developments where units are under individual ownership.~~

### USES PERMITTED SUBJECT TO DIRECTOR REVIEW (Director Review Processing, Ch. 31)

- ~~A short-term lodging structure California Building Code standards for transient lodging facilities as a Hhotels, motels, lodges, bed and breakfast establishments, visitor cabins, and other short-term lodging found to be similar by the Commission that does not exceed 2,500 square feet in floor area.~~

~~Transient rentals (rentals for fewer than 30 consecutive days) in single family residential units, including accessory dwelling units, and multi-family units under single ownership of up to three dwelling units.~~

### USES PERMITTED SUBJECT TO USE PERMIT (Use Permit Processing, Ch. 32)

- Mobile-home parks (see Dev. Standards –Mobile-home and RV Parks, Ch. 17), campgrounds and glamping
- Recreational-vehicle parks (see Ch. 17)
- Projects containing four or more units such as condominiums, cooperatives, townhomes, cluster developments, and/or apartments
- ~~Nightly lodging California Building Code standard for transient lodging facilities such as Hhotels, motels, lodges, bed and breakfast establishments, visitor cabins and other uses short-term commercial lodging found to be similar by the Commission comprised of multiple structure or that exceeds 2,500 square feet in floor area.~~ Ancillary uses such as limited dining, lounges and convenience retail, provided the ancillary use does not occupy more than 25% of the project's habitable space.
- ~~Short-term rentals (30 consecutive days or fewer) in compliance with Chapter 25 of the Land Development Regulations (set forth in Section VI of this Land Use Element) and with a valid Short-Term Rental Activity Permit and in compliance with all operational requirements of Chapter 5.65 of the Mono County Code and any applicable area plan policies (e.g., see June Lake Area Plan). Transient rentals (fewer than 30 consecutive days) in residential (single or multi-family) units where the owner will have more than one short term rental in any land use designation in Mono County multi-family units under single ownership of four or more dwelling units.~~
- ~~Conversion of five or more apartment units into transient rentals~~
- Conversion of existing habitable space into ancillary uses
- Parking lots and parking structures other than required off-street parking
- Construction of an accessory building prior to construction of the main building

### DEVELOPMENT STANDARDS

#### Minimum Lot Area:

All uses – 10,000 sf<sup>4</sup>

Land uses on lots measuring less than 10,000 sq. ft. shall be limited to single-family residences, duplexes and triplexes (mobile homes are not permitted)

**Minimum District Area:**            3 acres            CL-M  
   5 acres            CL-H

If the land use designation and existing uses of abutting properties are compatible, a minimum district area of two acres may be considered.

**Minimum Lot Dimensions:** Width – 60', Depth – 100'

**Maximum Lot Coverage:**    60%

**Minimum Setbacks:**

**Front:**    10'                    **Rear:**    5'                    **Side:**    0'

See Section 04.120 for other provisions.

**Building Density:**

**CL-M**        Hotels, motels, lodges, bed-and-breakfast establishments, rental cabins and other similar uses  
                 – 15 du/acre  
                 Apartments, multifamily units, condominiums and similar uses – 15 du/acre

**CL-H**        Hotels, motels, lodges, bed-and-breakfast establishments, rental cabins and other similar uses  
                 – 40 du/acre  
                 Apartments, multifamily units, condominiums and similar uses – 15 du/acre

If density bonuses are granted (see 04.100 Density), ~~in~~ no case shall projects ~~exceed~~ 26 units/acre for residential units and 60 units/acre for commercial lodging units in the CL-H.

Units designated as manager/employee housing unit shall not be counted in density calculations.

**Population Density:**

Maximum population density is 37.6 persons/acre for multifamily residential uses.

**Maximum Building Height:** ~~35'~~        See Table 04.010 for other provisions.

**Landscaping:**        Projects subject to use permit shall submit a landscape site plan at the time of application.

**NOTES**

1. Accessory buildings and uses customarily incidental to any of the permitted uses are permitted only when located on the same lot and constructed simultaneously with or subsequent to the main building.
2. Densities stated are based upon availability of both community water and sewer.
3. Uses may have been omitted from the list of those specified, hence the Commission may find other uses to be similar and not more obnoxious or detrimental to the public health, safety and welfare. See explanation of interpreting "similar uses" (Ch. 04, Uses not listed as permitted).
4. Lots requiring individual septic systems are subject to minimum dimensions as determined by the Lahontan Regional Water Quality Control Board.
5. Transitional and Supportive Housing projects are permitted in the same manner as other residential housing.

**SEE ALSO**

**Land Development Regulations –**

Ch. 04            Development Standards – General  
Ch. 06            Development Standards – Parking  
Ch. 07            Development Standards – Signs  
Table 04.010    Building Heights

### **Multi-Family Residential, Low (MFR-L), Moderate (MFR-M), High (MFR-H)**

**INTENT:** The “MFR-L” designation is intended to provide for low-density multifamily residential development, such as duplexes and triplexes.

The “MFR-M” designation is intended to encourage long-term multifamily housing by allowing for higher population densities and by not allowing commercial lodging facilities; i.e., hotels, motels.

The “MFR-H” designation is intended to encourage multifamily units by allowing for higher population densities and to provide for commercial lodging facilities; i.e., hotels, motels.

#### **PERMITTED USES**

- Single-family dwelling
- Manufactured home used as a single-family dwelling<sup>1</sup> – MFR-L only<sup>C</sup>
- Duplexes and triplexes
- Accessory buildings and uses<sup>2</sup>
- Animals and pets (see Animal Standards Section 04.270)
- Home occupations (see Home Occupation regulations, Section 04.290)
- Small-scale agriculture<sup>2</sup>
- Transitional and Supportive Housing including Single Room Occupancy facilities<sup>6</sup>
- Outdoor cultivation of a maximum of six mature and 12 immature cannabis plants under the Compassionate Use Act.

#### **USES PERMITTED SUBJECT TO DIRECTOR REVIEW** (Director Review Processing, Ch. 31)

- MFR-L: Model units
- None stated for MFR-M and MFR-H

#### **USES PERMITTED SUBJECT TO USE PERMIT** (Use Permit Processing, Ch. 32)

##### **MFR-L, MFR-M and MFR-H**

- Art galleries
- Quasi-public buildings and uses
- Public utility buildings and structures, not including service yards
- Country clubs and golf courses
- Condominiums, cooperatives, townhomes, cluster developments, apartments containing four or more units
- Parking lots and parking structures

##### **MFR-H only**

- Mobile-home parks (see Dev. Standards - Mobile Homes and RV Parks, Ch. 17)
- Recreational-vehicle parks (see Ch. 17)
- Social care facilities and related integrated professional offices
- Parking lots and parking structures when abutting a commercial district
- Hotels, motels, bed-and-breakfast establishments and dorms
- ~~Transient rentals (fewer than 30 consecutive days)~~
- [Short-term rentals \(30 consecutive days or fewer\) in compliance with Chapter 25 of the Land Development Regulations \(set forth in Section VI of this Land Use Element\) with a valid Short-Term Rental Activity Permit and in compliance with all operational requirements of Chapter 5.65 of the Mono County Code and any applicable area plan policies \(e.g., see June Lake Area Plan\).](#)
- Manufactured housing subdivision (see Ch. 18)

~~Transient~~[Short-term](#) rentals (~~fewer than 30 consecutive days~~ [or fewer](#)) are prohibited in MFR-L and MFR-M, except in the following complexes: Interlaken, Edgewater, Sierra Suns, or in complexes where [Existing](#) transient

rentals in MFR-L and MFR-M land use is designations may continue to operate subject to their approvals after the effective date of GPA 25-01 (date), but the rental right does not specifically addressed in the use permit and/or parcel map of an existing development transfer to a new property owner. Properties sold and can be demonstrated as a non-conforming use prior to /or otherwise transferred after the adoption effective date of this General Plan Amendment. GPA 25-01 are subject to discretionary short-term rental regulations as described herein.

## DEVELOPMENT STANDARDS

### Minimum Lot Area:

#### MFR-L

Minimum lot size - 7,500 sf <sup>5</sup>

Single-family residences & duplexes - 7,500 sf

Developments of three or more units - (number of units) x 3,750 sf

Schools - 5 acres

#### MFR-M

Minimum lot size - 7,500 sf <sup>5</sup>

Developments of three or more units - (number of units) x 2,904 sf

#### MFR-H

Minimum lot size - 7,500 sf <sup>5</sup>

Developments of three or more units - (number of units) x 2,904 sf

Hotels, resort hotels, and motels - 20,000 sf

*Minimum lot size of 7,500 square feet for single-family residences and duplexes is based on subdivision requirements. Minimum lot size for developments of three or more units is based on density maximums - 11.6 du/ acre for MFR-L and 15 du/ acre for MFR-M and MFR-H.*

<b>Minimum District Area:</b>	<b>MFR-M</b>	3 acres
	<b>MFR-H</b>	5 acres

<b>Minimum Lot Dimensions:</b>	Width-60'
	Depth-100'

MFR-L width for:

- Condominiums, cooperatives, townhomes, cluster developments - 150'
- Schools - 200'

<b>Maximum Lot Coverage:</b>	<b>MFR-L – 40%</b>	<b>MFR-M and MFR-H – 60%</b>
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### Minimum Setbacks:

<b>Front:</b> 20'	<b>Rear:</b> 10'	<b>Side:</b> 10'
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See Section 04.120 for other provisions.

### Building Density:

#### MFR-L

1 du/3,750 sq. ft. or 11.6 du/acre

### **MFR-M & -H**

Condominiums, multifamily residences and similar uses - 15 du/acre

In no case shall projects containing density bonuses exceed 26 units/acre. Units designated as manager/ employee housing unit shall not be counted in density calculations.

### **MFR-H**

Hotels, motels, bed-and-breakfast establishments, etc. - 40 units/acre

**Population Density:** Maximum population density is 37.6 persons per acre for multifamily dwellings.

**Maximum Building Height:** 35' See Table 04.010 for other provisions.

**Landscaping:** Projects subject to use permit shall submit a landscape site plan at the time of application. A minimum of 5% of the building site shall be landscaped in the MFR-L designation.

### **NOTES**

1. Provided that the unit is fewer than 10 years old and meets the criteria set forth in Section 04.280. When there are two mobile homes on the same parcel, they must 1) comply with the Accessory Dwelling Unit requirements (see Ch. 16), or 2) comply with State standards for a mobile-home park and obtain a use permit from the County (see Ch. 17, Mobile Homes and RV Parks).
2. Accessory buildings, small-scale agriculture, and uses customarily incidental to any of the permitted uses are permitted only when located on the same lot and constructed simultaneously with or subsequent to the main building.
3. Densities stated are based upon availability of both community water and sewer.
4. Uses may have been omitted from the list of those specified, hence the Commission may find other uses to be similar and not more obnoxious or detrimental to the public health, safety and welfare. See explanation of interpreting "similar uses" (Ch. 04, Uses not listed as permitted).
5. Lots requiring individual septic systems are subject to minimum dimensions as determined by the Lahontan Regional Water Quality Control Board.
6. Transitional and Supportive Housing projects are permitted in the same manner as other residential housing.

### **SEE ALSO**

#### **Land Development Regulations –**

Ch. 03	Uses Permitted
Ch. 04	Development Standards - General
Ch. 06	Development Standards - Parking
Ch. 07	Development Standards - Signs
Table 04.010	Building Heights

### **FOOTNOTES**

- c. Clarification

## Mixed Use (MU)

**INTENT:** The “MU” designation is intended to provide for a wide range of compatible resident- and visitor-oriented residential and commercial uses, including business, professional, and retail uses; to provide for efficient use of land and increased opportunities for affordable housing; to provide a transition between intensive commercial uses and residential uses; and to be applied to areas with existing mixed-use development.

**MU transitional areas can limit the size of business establishments and restrict uses incompatible with residential district. Not all areas need contain residential uses. Commercial uses shall conform to strict standards that prohibit obnoxious odors, obtrusive light and glare, and excessive noise.**

### USES PERMITTED

- Single-family dwelling
- Manufactured home used as a single-family dwelling.<sup>1c</sup> Mobile homes are excluded from June Lake<sup>gp</sup>
- Duplexes and triplexes
- Accessory buildings and uses<sup>2</sup>
- Animals and pets (see Animal Standards Section 04.270)
- Home occupations (see Home Occupation regulations, Section 04.290)
- Small-scale agriculture
- Transitional and Supportive Housing including Single Room Occupancy facilities<sup>6</sup>
- Outdoor cultivation of a maximum of six mature and 12 immature cannabis plants under the Compassionate Use Act.

### USES PERMITTED SUBJECT TO DIRECTOR REVIEW (Director Review Processing, Ch. 31)

- Residential uses – e.g., condominiums, townhomes, commercial lodging, cluster developments, and apartments
- Retail trade – e.g., food, drug, hardware, apparel, arts and crafts, sporting goods, bookstores, bakery, florist
- Social care facilities – e.g., medical and dental offices, welfare and charitable services
- Professional offices – e.g., real estate, financial, insurance, rental and reservation services, legal services
- Business services – e.g., business centers, general advertising, business and management consulting
- Recreational activities – e.g., health clubs, dance studios
- Food service establishments – e.g., restaurants, cafes, delicatessens
- ~~Conversion or expansion of existing operations~~
- ~~Transient rentals (fewer than 30 consecutive days)~~

### USES PERMITTED SUBJECT TO USE PERMIT (Use Permit Processing, Ch. 32)

- All of the above uses subject to Director Review, if determined to be necessary by the Community Development director
- Parking lots and parking structures other than required off-street parking when abutting a commercial district
- Religious and cultural activities – e.g., museums, art galleries, churches
- Small-scale malls, plazas, parks and related pedestrian open space
- Conversion or expansion of existing operations
- Mobile-home parks (see Development Standards – Mobile-home Parks and RV Parks, Ch. 17)<sup>c</sup>
- Recreational-vehicle parks (see Ch. 17), campgrounds and glamping<sup>c</sup>
- Manufactured housing subdivision (see Ch. 18)
- Commercial cannabis activity: Manufacturing Type N, Manufacturing Type P, Distribution, Testing, Retail, and Microbusiness (only individual cannabis activities permitted in this designation shall be permitted in a Microbusiness), conducted in compliance with requirements of Chapter 13 of the Land

Development Regulations and with the permit and operation requirements of Chapter 5.60 of the Mono County Code

- Short-term rentals (fewer than 30 consecutive days or fewer) in compliance with Chapter 25 of the Land Development Regulations (set forth in Section VI of this Land Use Element), and with a valid Short-Term Rental Activity Permit, and in compliance with all operational requirements of Chapter 5.65 of the Mono County Code and any applicable area plan policies (e.g., see June Lake Area Plan and June Lake Land Use Policy, see Objective 13.M.).

**DEVELOPMENT STANDARDS**

**Minimum Lot Area:**

All uses – 10,000 sf<sup>5</sup>  
Areas lacking community water and sewer – one-acre minimum all uses<sup>c, rp</sup>

Land uses on lots measuring less than 10,000 sq. ft. shall be limited to single-family residences, duplexes and triplexes.

**Minimum District Area:** 5 acres

If the land use designation and existing uses of abutting properties are compatible, a minimum district area of two acres may be considered.

**Minimum Lot Dimensions:** Width – 60’  
Depth – 100’

**Maximum Lot Coverage:** 60%  
An additional coverage bonus of 10% (total coverage of 70%) shall be granted to structures that contain mixed commercial and residential (employee or long-term rentals) uses; commercial uses with public accommodations; or commercial uses that front a public pedestrian mall or plaza.

**Minimum Setbacks:**

**Front:** 10’                      **Rear:** 5’                      **Side:** 10’

See Section 04.120 for other provisions.

**Building Density:** Hotels, resort hotels, motels – 40 du/acre  
Apartments, multifamily units, condominiums and similar uses – 15 du/acre

Density for mixed uses on one parcel; e.g., apartment units and motel units, will be calculated at a proportionate rate.<sup>gp</sup>

If density bonuses are granted (see 04.100 Density), in no case shall projects exceed 26 units per acre for residential units and 60 units per acre for commercial lodging units.  
Units designated as manager/employee housing unit shall not be counted in density calculations.

**Population Density:** Maximum population density is 37.6 persons per acre for multifamily residential uses.

**Maximum Building Height:** 35’                      See Table 04.010 for other provisions.

**Landscaping:** Projects subject to use permit shall be required to either landscape per an approved landscape site plan or leave in natural open space (i.e., ungraded) all areas not covered by impervious surfaces. Any combination is acceptable.

**Special Regulations:**

- A change of business shall be reviewed for compliance with mixed-use designation.
- The hours of operation shall be limited to the period between 7 a.m. and 10 p.m.
- Businesses operating within the zone shall not exceed a sustained or intermittent noise level of 60 dB( $L_{dn}$ /CNEL).
- Projects shall be reviewed for adverse impacts resulting from exterior lighting and signs.
- Uses involving or producing noxious fumes or odors shall not be permitted unless fumes or odors are treated or diffused prior to release from the generating source.
- Operations using and storing noxious chemicals including but not limited to pesticides and herbicides, other than those packaged for resale, large volumes of solvents or flammable liquids, will not be allowed.

### **NOTES**

1. Provided that the unit is fewer than 10 years old and meets the criteria set forth in Section 04.280. When there are two mobile homes on the same parcel, they must: 1) comply with the Accessory Dwelling Unit requirements (see Ch. 16); or 2) comply with State standards for a mobile-home park and obtain a use permit from the County (see Ch. 17, Mobile-home and RV Parks). Mobile homes are excluded from June Lake.
2. Accessory buildings and uses customarily incidental to any of the permitted uses are permitted only when located on the same lot and constructed simultaneously with or subsequent to the main building.
3. Densities stated are based upon availability of both community water and sewer.
4. Uses may have been omitted from the list of those specified, hence the Commission may find other uses to be similar and not more obnoxious or detrimental to the public health, safety and welfare. See explanation of interpreting "similar uses" (Ch. 04, Uses not listed as permitted).
5. Lots requiring individual septic systems are subject to minimum dimensions as determined by the Lahontan Regional Water Quality Control Board.
6. Transitional and Supportive Housing projects are permitted in the same manner as other residential housing.

### **SEE ALSO**

#### **Land Development Regulations –**

- Ch. 04            Development Standards – General
- Ch. 06            Development Standards – Parking
- Ch. 07            Development Standards – Signs
- Table 04.010   Building Heights

Land Use Element – Antelope Valley Policies, June Lake Policies, and Long Valley Policies

### **FOOTNOTES**

- c.            Clarification
- rp.          Recommendation from the Regional Planning Advisory Committee
- gp.          General Plan addition



## Natural Habitat Protection (NHP)

**INTENT:** The “NHP” designation is intended to protect sensitive environmental habitats by minimizing site disturbance and development. Private lands placed in this district contain valuable wildlife habitat, scenic resources, and/or areas subject to natural hazards. Lands contained in this district are high priorities for land exchanges into public holding or purchases by land conservation organizations.

### PERMITTED USES

- Single-family dwelling (excluding mobile homes)
- Accessory buildings and uses<sup>1</sup>
- Wildlife preserves, botanical preserves, wetland preservation/banking, and similar uses<sup>c, gp</sup>
- Outdoor cultivation of a maximum of six mature and 12 immature cannabis plants under the Compassionate Use Act<sup>2</sup>

### USES PERMITTED SUBJECT TO DIRECTOR REVIEW (Director Review Processing, Ch. 31)

- [None listed.](#)
- ~~Transient rentals (rental for fewer than 30 consecutive days) of up to three dwelling units (i.e., rental cabins or bed-and-breakfast establishments with up to three dwelling units.).~~

### USES PERMITTED SUBJECT TO USE PERMIT (Use Permit Processing, Ch. 32)

- Construction of an accessory building prior to construction of the main building
- Limited-density residential development such as condominiums, cooperatives, townhouses, and cluster developments, if found to be compatible with the natural habitat area by the Commission
- Commercial lodging uses such as limited-scale hotels, motels, including lodges, bed-and-breakfast establishments, and cabins if found to be compatible with the natural habitat area by the Commission
- Recreation facilities, such as improved bike, cross country skiing, and pedestrian trails, golf courses, tennis courts, stables requiring modification of the natural landscape, if found to be compatible with the natural habitat area by the Commission
- Educational facilities such as a nature or interpretive center focusing on natural site characteristics, if found to be compatible with the natural habitat area by the Commission
- ~~Short term rentals (fewer than 30 consecutive days) in compliance with Chapter 25 of the Land Development Regulations (set forth in Section VI of this Land Use Element), with a valid Short Term Rental Activity Permit, and in compliance with all operational requirements of Chapter 5.65 of the Mono County Code and any applicable area plan policies (e.g., see June Lake Area Plan and June Lake Land Use Policy, Objective 13.M.)~~

### DEVELOPMENT STANDARDS

**Minimum Parcel Size:** 2 acres

**Minimum District Area:** 5 acres

The Planning Commission may reduce the minimum district area in order to protect sensitive environmental habitats.

**Minimum Lot Dimensions:** None stated

**Maximum Site Disturbance:** 10% maximum lot coverage for all structures, parking and access is 5%. The county General Plan, area plans or specific plans may contain more-restrictive coverage limitations (i.e., see the June Lake Area Plan Natural Habitat Protection District policies). Project site plans shall show the extent of lot coverage and site disturbance.

**Minimum Setbacks:** 30 feet from any property line or road. Variances may be granted where the project is located to minimize impacts to significant natural site features, but shall not be granted to increase development intensity.

**Density:** 1 du/5 acres  
Commercial lodging units, one unit/three acres

**Population Density:** Maximum population density is one person/acre for commercial lodging uses.

**Maximum Building Height:** 24' See Table 04.010 for other provisions

**Additional Requirements:**

- Development projects in the NHP district shall be located in a manner that minimizes visual impacts on surrounding property owners and scenic highways or major thoroughfares. Visual screening may also be used to minimize visual impacts.
- Development projects, where feasible, shall be located away from or outside sensitive wildlife habitat areas.
- Projects in potential wetland areas shall receive 404 permit approvals or other applicable clearance from the Army Corps of Engineers prior to applying for County development permit.
- Other requirements may be required in area or specific plans.

**NOTES**

1. Accessory buildings and uses customarily incidental to any of the permitted uses are permitted only when located on the same lot and constructed simultaneously with or subsequent to the main building.
2. Large-scale projects may be subject to a specific plan (Ch. 36) in conformance to the General Plan.
3. Uses may have been omitted from the list of those specified, hence the Commission may find other uses to be similar and not more obnoxious or detrimental to the public health, safety and welfare. See explanation of interpreting "similar uses" Chapter 04, Uses not listed as permitted.

**SEE ALSO**

**Land Development Regulations –**

Ch. 03 Uses Permitted  
Ch. 04 Development Standards – General  
Ch. 06 Development Standards – Parking  
Table 04.010 Building Heights

**FOOTNOTES**

c. Clarification  
gp. General Plan addition

## Rural Resort (RU)

**INTENT:** The “RU” designation is intended to provide appropriate sites for outdoor recreation facilities and limited visitor-oriented facilities and services in rural areas of the county. The district is intended to protect the environment and rural character of an area while allowing for compatible development.

### PERMITTED USES

- Single-family dwelling
- Accessory buildings and uses<sup>1</sup>
- Manufactured home used as a single-family dwelling<sup>2</sup>
- Animals and pets (see Animal Standards Section 04.270)
- Home occupations (see Home Occupation regulations, Section 04.290)
- Small-scale agriculture
- Adult-oriented businesses conducted in compliance with the locational requirements of Chapter 19 of the Land Development Regulations (set forth in Section VI of this Land Use Element) and with the permit and other operational requirements of Chapter 5.45 of the Mono County Code
- Accessory Dwelling Unit (as prescribed in Chapter 16, Development Standards – Accessory Dwelling Unit)
- Transitional and Supportive Housing including Single Room Occupancy facilities<sup>4</sup>
- Outdoor cultivation of a maximum of six mature and 12 immature cannabis plants under the Compassionate Use Act.

### USES PERMITTED SUBJECT TO DIRECTOR REVIEW (Director Review Processing, Ch. 31)

- None stated

### USES PERMITTED SUBJECT TO USE PERMIT (Use Permit Processing, Ch. 32)

- Construction of an accessory building prior to construction of the main building
- Recreational-vehicle parks (see Dev. Standards – Mobile-home and RV Parks, Ch. 17), campgrounds and glamping
- ~~Nightly~~ Short-term lodging complying with California Building Code standards for transient lodging facilities such as hotels, motels, lodges, visitor cabins, and other short-term lodging found to be similar by the Commission ~~Hotels, motels, bed and breakfast establishments, cabins and other uses found to be similar by the Commission.~~
- Ancillary uses such as limited restaurants, lounges and convenience retail, provided the ancillary use does not occupy more than 25% of the project's habitable space.
- ~~Transient rentals (fewer than 30 consecutive days)~~ Short-term rentals (fewer than 30 consecutive days or fewer) in compliance with Chapter 25 of the Land Development Regulations (set forth in Section VI of this Land Use Element), with a valid Short-Term Rental Activity Permit, and in compliance with all operational requirements of Chapter 5.65 of the Mono County Code and any applicable area plan policies (e.g., see June Lake Area Plan and June Lake Land Use Policy, Objective 13.M.).
- ~~Developed campgrounds~~
- Commercial recreational facilities such as cross country ski facilities, equestrian facilities, golf courses and facilities (if developed in conjunction with lodging facilities), marinas and boathouses
- Employee housing, if developed in conjunction with recreational/lodging facilities

### DEVELOPMENT STANDARDS

**Minimum Parcel Size:** 5 acres

**Minimum Lot Dimensions:** Width – 60’  
Depth – 100’

**Site Disturbance:** 10% (includes a maximum of 5% lot coverage).

Maximum site disturbance may be increased if the remainder of the parcel is preserved as open space in perpetuity.

**Minimum Setbacks:**

**Front:** 30'                      **Rear:** 30'                      **Side:** 30'

**Building Density:** One du per 5 acres and an Accessory Dwelling Unit (see Ch. 16, Development Standards – Accessory Dwelling Units. Lodging facilities may not exceed a maximum intensity of 40 units/acre and a total of 150 units/site. Spaces for recreational vehicles may not exceed a maximum density of 17 spaces/acre. Density for mixed uses on one parcel; e.g., motel units and RV spaces will be calculated at a proportionate rate.

**NOTES**

1. Accessory buildings and uses customarily incidental to any of the permitted uses are permitted only when located on the same lot and constructed simultaneously with or subsequent to the main building.
2. Provided that the unit is fewer than 10 years old and meets the criteria set forth in Section 04.280. When there are two mobile homes on the same parcel, they must 1) comply with the Accessory Dwelling Unit requirements (see Ch. 16), or 2) comply with State standards for a mobile-home park and obtain a use permit from the County (see Ch. 17, Mobile Homes and RV Parks).
3. Uses may have been omitted from the list of those specified, hence the Commission may find other uses to be similar and not more obnoxious or detrimental to the public health, safety and welfare. See explanation of interpreting "similar uses" Chapter 04, Uses not listed as permitted.
4. Transitional and Supportive Housing projects are permitted in the same manner as other residential housing.

**SEE ALSO**

**Land Development Regulations –**

Ch. 04              Development Standards – General  
 Ch. 06              Development Standards – Parking  
 Ch. 07              Development Standards – Signs  
 Table 04.010    Building Heights

**GENERAL PROVISIONS**  
**CHAPTER 02 – DEFINITIONS**

**Sections:**

02.010	Context and General terminology.
02.020	Abutting.
02.030	Accessory.
02.031	Accessory dwelling unit.
02.040	Acreage.
	(a) gross acreage.
	(b) net acreage.
02.050	Adjacent.
02.060	Agriculture.
02.070	Airport.
02.080	Alley.
02.090	Alquist-Priolo Geologic Hazard Zone Act.
02.110	Animal hospital, large.
02.120	Animal hospital, small.
02.130	Apartment.
02.140	Automobile wrecking yard.
02.150	Bed-and-Breakfast.
02.160	Block.
02.170	Buffer.
02.180	Building.
02.190	Building, accessory.
02.195	Building, envelope.
02.200	Building, main.
02.210	Building, site.
02.220	Business.
02.230	Campground.
02.231	Caretaker's unit
02.240	Carport.
02.250	Cattle feed yard.
02.260	Cemetery.
02.270	Club.
02.280	Combining district.
02.290	Cluster development.
02.300	Conversion of existing residential facilities to other uses.
02.310	(a) Condominium, commercial.
	(b) Condominium, industrial.
	(c) Condominium, residential.
	(d) Condominium, hotel.
02.320	Contiguous.
02.330	Consistency.
02.340	Country club.
02.350	Court.
02.360	Density.
02.370	Design.

02.375	Designation.
02.380	Design Review Committee.
02.390	Development agreements.
02.400	Deviation.
02.410	District area.
02.420	Dorm.
02.430	Duplex.
02.440	Dwelling.
02.450	Dwelling, multifamily.
02.460	Dwelling, one family.
02.470	Environmental impact.
02.480	Factory-built housing.
02.490	Family.
02.500	Farm labor quarters.
02.510	Findings.
02.520	Floor area ratio.
02.530	Garage, private.
02.540	Garage, public.
02.541	Glamping
02.550	Golf course.
02.560	Guesthouse.
02.570	Grade, natural.
02.580	Height of building.
02.590	Home occupation.
<u>02.600</u>	<u>Host.</u>
<u>02.610</u>	<u>Hosted rental.</u>
02.620	Hotel.
02.630	Hotel, resort.
02.640	Industrial park.
02.650	Infrastructure.
02.660	Joint-use parking.
02.670	Junkyard.
02.680	Kennel.
	(a) Kennel, private.
	(b) Kennel, commercial.
02.690	Kitchen.
02.700	Land Development Technical Advisory Committee.
02.705	Land use designation.
02.710	Landscaping.
<u>02.715</u>	<u>Long-term rental.</u>
02.720	Lot.
02.730	Lot coverage.
02.740	Lot, double frontage.
02.750	Lot depth.
02.760	Lot width.
02.770	Manufactured housing.
02.780	Manufactured housing subdivision.
02.790	Mobile home.
02.800	Mobile-home display units.
02.810	Mobile-home park.

02.820	Modular.
02.830	Model home or unit, temporary.
02.840	Motel.
02.850	Nonconforming.
<a href="#">02.855</a>	<a href="#">Non-Hosted rental.</a>
02.860	Nurseries.
02.870	Open space.
02.880	Outdoor sales.
02.890	Overlay district.
02.900	Parking space.
02.910	Parking, underground structure.
02.912	Permitted use.
02.915	Pool.
02.920	Poultry farms.
02.930	Professional office.
02.940	Public buildings and uses.
02.950	Public utility buildings, structures and uses.
02.960	Quasi-public buildings and uses.
02.970	Recreational vehicles.
02.980	Recreational-vehicle park.
02.990	Scenic Highway.
02.1000	Scenic Highway Corridor.
02.1010	Screening.
02.1020	Service station.
02.1030	Setback line, street.
<a href="#">02.1035</a>	<a href="#">Short-term rental.</a>
02.1040	Sign.
02.1042	Single Room Occupancy.
02.1045	Site disturbance.
02.1050	Site plan.
02.1060	Site plan review.
02.1063	Small-scale agriculture.
02.1065	Snow-storage area.
02.1070	Social care facility.
02.1080	Special event.
02.1090	Stable, private.
02.1100	Stable, public.
02.1110	Street line.
02.1120	Street, public.
02.1121	Strip commercial.
02.1130	Structural alterations.
02.1140	Structure.
02.1150	Subdivision.
02.1160	Substandard lot.
02.1165	Supportive housing.
02.1170	Temporary use.
02.1180	Time-share project.
02.1190	Time-share estate.
02.1200	Time-share use.

<b>02.1201</b>	<b>Tract housing.</b>
<b>02.1210</b>	<b>Transient rental.</b>
<b>02.1215</b>	<b>Transitional housing.</b>
<b>02.1220</b>	<b>Travel trailer.</b>
<b>02.1230</b>	<b>Use.</b>
<b>02.1240</b>	<b>Use, accessory.</b>
<b>02.1245</b>	<b>Visitor rentals.</b>
<b>02.1250</b>	<b>Yard.</b>
<b>02.1260</b>	<b>Yard, front.</b>
<b>02.1270</b>	<b>Yard, rear.</b>
<b>02.1280</b>	<b>Yard, side.</b>

### **02.010 Context and General terminology.**

The terms and definitions contained in this chapter shall be used to assist in interpreting the provisions of the Land Development Regulations only.

When not inconsistent with the context, words used in the present tense include the future; words in the singular number include the plural, those in the plural number include the singular; "or" includes "and," and "and" includes "or."

- A. "Commission" means the Planning Commission of Mono County.
- B. "County boundary" means the boundary of Mono County.
- C. "Division" means the Planning Division.
- D. "Director" means the Director of Community Development In the case of Minor Variances pursuant to section 01.041, the Director shall serve in a capacity similar to the zoning administrator as defined in Government Code section 65901."
- E. "Federal" means the government of the United States of America.
- F. "Used" includes "arranged for, designed for, occupied or intended to be occupied for."

### **02.020 Abutting.**

"Abutting" means having a common border.

### **02.030 Accessory building or use.**

"Accessory building or use" means a subordinate building or use incidental to that of the main building or main use on the same lot.

### **02.031 Accessory dwelling unit**

"Accessory dwelling unit" means a secondary residential unit located on the same parcel as the primary residential unit. It provides complete, independent living facilities for one or more persons. It includes permanent provisions for living, sleeping, eating, cooking, and sanitation. It can be either attached to or detached from the existing residential unit, dependent on the lot or parcel size (see Ch. 16, Development Standards – Accessory Dwelling Units).



**02.040 Acreage.**

- A. Acreage, gross. "Gross acreage" means the total lot or parcel area as determined through calculations based on the recorded legal description for the subject property.
- B. Acreage, net. "Net acreage" means the total lot or parcel area remaining after existing and/or proposed rights of way have been excluded.

**02.050 Adjacent.**

"Adjacent" means near, close or abutting; e.g., a retail business district across the street or highway from a residential district shall be considered as "adjacent."

**02.060 Agriculture.**

"Agriculture" means the art , science or practice of farming , including the cultivation and harvesting of crops and rearing and management of livestock; tillage; husbandry; horticulture; aquaculture and forestry, the science and art of the production of plants and animals useful to man.

**02.070 Airport.**

"Airport" means any area that is intended and used for the regular taking off and landing of conventional aircraft, including helicopters, and any appurtenant areas that are used or are intended to be used for airport buildings or facilities, including open spaces, taxiways and "tie-down" areas.

**02.080 Alley.**

"Alley" means a passage or way open to public travel, affording a secondary means of vehicular access to abutting lots and not intended for general traffic circulation.

**02.090 Alquist-Priolo Earthquake Fault Land Use Designations and Land Development Regulations Act.**

"Alquist-Priolo Earthquake Fault Land Use Designations and Land Development Regulations Act": Also known as the Alquist-Priolo Earthquake Fault Zones as of January 1994, its purpose is to provide for public safety in hazardous fault zones. The Act requires the delineation of potential damage areas, called "Special Studies Zones," along known active faults throughout California. It requires local governments to withhold approval of construction permits in those zones until geologic investigation has determined that the site is not threatened by surface displacement from future faulting.

**02.110 Animal hospital, large.**

"Animal hospital, large" means any premises used for the treatment, care, boarding, and grooming of large or small animals, and not conducted wholly within a building.

**02.120 Animal hospital, small.**

"Animal hospital, small" means any premises used for the treatment, care, boarding, and grooming of dogs, cats and similar size animals, with all operations being conducted wholly within a building unless otherwise specified in the use permit.

**~~02.1210 Transient rental.~~**

~~"Transient rental" means any structure, or portion of structure, which is occupied, or intended or designed for occupancy by transients for purposes of sleeping, lodging or similar reasons. A "transient" is any person who exercises occupancy, whether by agreement, concession, permit, right of access, license, contract, payment of rent or otherwise, for a period of 30 or fewer consecutive calendar days. For the purposes of the Mono County General Plan, the term "transient rental" applies to such uses in non-residential land use designations and MFR-H (governed by those designations and Chapter 26), in contrast to "short-term rentals."~~

**02.130 Apartment.**

"Apartment" means a room or suite of two or more rooms forming a residence, typically in a building containing more than one of these.

**02.140 Automobile wrecking yard.**

"Automobile wrecking yard" means the same as junkyard.

**02.150 Bed-and-Breakfast.**

"Bed-and-Breakfast" establishment means a transient dwelling other than a hotel or dorm where lodging and meals are provided for compensation. Further, no meal service may be provided other than for guests staying on the premises.

**02.160 Block.**

"Block" means that property abutting on one side of a street and lying between the two nearest intersecting or intercepting streets or nearest intersecting or intercepting streets, unsubdivided acreage, watercourse or body of water.

**02.170 Buffer.**

"Buffer" means a strip of land established to separate incompatible or different land uses. Normally a buffer area is landscaped and retained as open space. The term may be used more broadly to describe any area that separates two unlike land uses, such as multifamily housing between single-family housing and commercial uses.

**02.180 Building.**

"Building" means any structure built for the support, shelter or enclosure of any person, animal, or for storage.

**02.190 Building, accessory.**

"Building, accessory" means a subordinate building, the use of which is incidental to that of a main building on the same building site.

**02.195 Building, envelope.**

"Building Envelope" mean a three dimensional zone that limits the extents of a building in any direction.

**02.200 Building, main.**

"Building, main" means a building in which is conducted the principal use of the building site upon which it is located. In any residential district, any dwelling shall be deemed to be a main building on the building site upon which it is located.

**02.210 Building site.**

"Building site" means a parcel of land occupied or intended to be occupied by one building or group of buildings and uses customarily accessory and incidental thereto, including such open spaces as are provided or are intended to be used in connection therewith or are required by the regulations for the district wherein such parcel is located.

**02.220 Business.**

"Business" means the retail or wholesale sale, provision of service, or handling of any article, substance or commodity for profit or livelihood

**02.230 Campground.**

"Campground" means any area or tract of land with one or more spaces available for transient recreational occupancy (less than 30 days) upon which individuals may occupy individual campsites overnight. "Campground" does not include "Glamping" as defined in 02.541. or "Recreational-vehicle park" as defined in 02.980.

**02.231 Caretaker's unit.**

"Caretaker's unit" means a dwelling unit that is secondary and accessory to an existing allowed use that is occupied by a person engaged on-site for the purpose of care and protection of the property.

**02.240 Carport.**

"Carport" means an accessible and usable covered space of not less than the required dimensions for a parking space for the storage of automobiles. Carports shall be located to meet the setback and building height requirements of the land use designations and, land development regulations.

**02.250 Cattle feed yard.**

"Cattle feed yard" means any premises on which cattle are held or maintained for the purpose of feeding and fattening for market and where 60% or more of the feed for such cattle is imported or purchased.

**02.260 Cemetery.**

"Cemetery" means land used or intended to be used for the burial of the dead and dedicated for cemetery purposes, including columbariums, crematoriums, mausoleums and mortuaries when operated in conjunction with and within the boundary of such cemetery.

**02.270 Club.**

"Club" means an association of persons (whether incorporated or not) religious or otherwise, for a common purpose, but not including groups organized primarily to render a service carried on as a business for profit.

**02.280 Combining district.**

"Combining districts" are intended to provide an additional mechanism that can more precisely portray unique constraints or opportunities and may be applied to the underlying base designation (e.g., SFR, ER, AG, etc.). To establish a combining district the procedures outlined Chapter 48, Amendments, shall be followed.

**02.290 Cluster development.**

"Cluster development" means the concentration of detached single-family residences onto smaller lots than ordinarily permitted by the base designation (e.g., ER, SFR, etc.), or onto commonly owned lots, while not exceeding the permitted density for the total acreage being considered. This permits optimum use of the land; i.e., responding to site constraints by clustering away from the area of sensitivity, yet not decreasing the allowable density.

**02.300 Conversion of existing residential facilities to other uses.**

"Conversion of existing residential facilities to other uses" means single-family or multifamily developments or apartments and mobile-home parks that are converted to another use, including the conversion to no use or cessation of use as residential facilities.

**02.310 (a) Condominium, commercial.**

"Condominium, commercial" is an estate in real property consisting of an undivided interest in common in a portion of a parcel of real property together with a separate interest in space in a building used for commercial purposes such as offices and stores.

**02.310 (b) Condominium, industrial.**

"Condominium, industrial" is an estate in real property consisting of an undivided interest in common in a portion of a parcel of real property together with a separate interest in space in a building used for industrial purposes such as manufacture, and assembly.

**02.310 (c) Condominium, residential.**

"Condominium, residential" is an estate in real property consisting of an undivided interest in common in a portion of a parcel of real property together with a separate interest in space in a building used as a residence.

**02.310 (d) Condominium, hotel.**

"Condominium, hotel" means an estate in real property consisting of an undivided interest in common in a portion of a parcel of real property together with a separate interest in space in a building used for vacation residence. A "condo-hotel" may or may not contain cooking facilities. Further, all development requirements part of a residential condominium shall be requirements of a condo-hotel. (Exception: If this is for financing purposes as specified in a Development Agreement or other agreed upon mechanism for a "hotel," these requirements shall not apply).

**02.320 Contiguous.**

"Contiguous" means in actual close contact; touching; bounded or traversed by. Property shall be considered as contiguous units, even if it is separated by roads, streets or easements.

**02.330 Consistency.**

"Consistency" means a review to ensure that all plans and actions conform to guidelines of this General Plan and Area General Plans.

**02.340 Country club.**

"Country club" means the land area and buildings containing recreational facilities, clubhouse, and usual accessory uses, open only to members and their guests for a membership fee.

**02.350 Court.**

"Court" means open, unoccupied space, other than a yard, on the same lot with a building or group of buildings and that is bounded on two or more sides by such buildings or structures.

**02.360 Density.**

"Density" means the ratio of dwelling units to net acreage.

**02.370 Design.**

"Design" means: 1) street alignments, grades and widths; 2) drainage and sanitary facilities and utilities, including alignments and grades thereof; 3) location and size of all required easements and rights of way; 4) fire roads and firebreaks; 5) lot size and configuration; 6) traffic access; 7) grading; 8) land to be dedicated for park or recreational purposes; and 9) such other specific physical requirements in the plan and configuration of a project as may be necessary to ensure consistency with or implementation of the General Plan, or any applicable specific plan.

**02.375 Designation**

"Designation" means "Land Use Designation" (defined below).

**02.380 Design Review Committee.**

"Design Review Committee (DRC)" means a person or persons appointed by the Board of Supervisors to review all applications for commercial structures, multifamily development, signs, and/or other new construction as defined by the DRC within a defined design review district. See also Land Use Element, Chapter 9.

**02.390 Development agreement.**

"Development agreement" means a contract or agreement whereby the County is authorized to enter into an agreement with developers that set forth the rules that will govern a development as it proceeds through the approval process. A development agreement must specify the time during which the County agrees not to change its regulations, and may also include any other terms and conditions including time schedules for development or additional public services and facilities to be provided by the developer.

**02.400 Deviation.**

"Deviation" means authorized variances from required distances, setbacks, areas or physical improvements.

**02.410 District area.**

"District area" means all land area within a specific land use designation. For instance, the SFR district area in a specific community may contain 50 acres. Acreage for any district area is calculated based on all contiguous property in a single land use designation.

**02.420 Dorm.**

"Dorm" means a transient lodging other than a hotel/motel, bed-and-breakfast or single-family residence. A dorm usually contains common sleeping, bathroom and kitchen facilities.

**02.430 Duplex.**

"Duplex" means a building designed or used exclusively for the occupancy of two families living independently of each other and having separate kitchen and toilet facilities for each family.

**02.440 Dwelling.**

"Dwelling" means a structure or portion thereof designed and used exclusively for residential occupancy and permitted home occupations, but not including hotels, motels, dorms, travel trailers, or tents.

**02.450 Dwelling, multifamily.**

"Dwelling, multifamily" means a building designed or used for occupancy by three or more families, all living independently of each other and having separate kitchen and toilet facilities for each family.

**02.460 Dwelling, one family.**

"Dwelling, one-family" or "single family" means a detached building designed or used exclusively for the occupancy of one family and having kitchen and toilet facilities for only one family.

**02.470 Environmental impact.**

"Environmental impact" means projected long- or short-term effects (adverse or beneficial) that a development project or plan may have on the natural and built environment if the project is carried out.

**02.480 Factory-built housing.**

"Factory-built housing" means a residential building, dwelling unit, or an individual dwelling room, or combination of rooms thereof, or building component, assembly, or system manufactured in such a manner that all concealed parts or processes of manufacture cannot be inspected before installation at the building site without disassembly, damage, or destruction of the part, including units designed for use as part of an institution for resident or patient care, which is either wholly manufactured or is in substantial part manufactured at an off-site location to be wholly or partially assembled on site in accordance with building standards published in the State Building Standards Code and other regulations adopted by the Commission pursuant to Section 19990. Factory-built housing does not include a mobile home, as defined in Health and Safety Code Section 18008, mobile accessory building or structure, as defined in Health and Safety Code Section 18010, a recreational vehicle, as defined in Health and Safety Code Section 18010.5, or a commercial coach, as defined in Health and Safety Code Section 18012 (see Health and Safety Code Section 19971).

**02.490 Family.**

"Family" means a person or persons living together as a single housekeeping unit in a dwelling unit.

**02.500 Farm-labor quarters.**

"Farm-labor quarters" means rooming or boarding houses, bunkhouses, trailers, mobile homes or mess halls for any number of farm laborers customarily employed principally on land owned or leased by the person or persons engaged in the agricultural enterprise, and located on the premises. Farm labor quarters also means farm labor housing where two or fewer families are provided living quarters or housing accommodations.

**02.510 Findings.**

"Findings" mean a set of conclusions that are required before specified permits, deviations, ordinance changes or other entitlements may be granted.

**02.515 Flag lot.**

"Flag lot" means a lot with two distinct parts: 1) The "flag" that is the building site; and 2) The "pole" that provides access and street frontage. See Section 04.310.

**02.520 Floor area ratio.**

"Floor area ratio" means the ratio of gross (e.g., including halls, restrooms, storage areas) floor area to total lot area expressed as a fraction.

**02.530 Garage, private.**

"Garage, private" means a detached accessory building or a portion of the main building on the same lot as a dwelling for the storage of vehicles of occupants of the dwelling.

**02.540 Garage, public.**

"Garage, public" means any premises, except those defined in this chapter as a private garage, used for the storage and/or repair of motor vehicles, or where any such vehicles are equipped for operation or repair (i.e., tow trucks), or kept for remuneration, hire or sale.

**02.541 Glamping.**

"Glamping" means a form of "glamorous camping" for a transient occupancy, where guests occupy detached units and/or permanently installed vintage recreational vehicles but which are not a conventional hotel, motel, or cabin facilities. Permanent units must comply with the California Building Code. "Glamping" does not include "Campgrounds" as defined in 02.230 or Recreational-vehicle park" as defined in 02.980.

**02.550 Golf course.**

"Golf course" means a golf course with a minimum of nine holes, none of which shall be less than a three par.

**02.560 Guesthouse.**

"Guesthouse" means an accessory use to a residence that may contain living and sleeping spaces, including bathrooms, but not facilities for the cooking of food.

**02.570 Grade, natural.**

"Grade, natural" means the incline of the surface of earth along a continuous slope before its alteration by the works of man (including any interim grading, whether authorized or not).

**02.580 Height of building.**

"Height of building" means the vertical distance from grade to the topmost point of the building, but excluding certain features as specified in Section 04.110 as set forth in subsection A and B of that section. All height shall be calculated from the natural or finished grade, whichever is more restrictive.

**02.590 Home occupation.**

"Home occupation" means any use that can be carried on within a dwelling by the inhabitants thereof and that is clearly incidental and secondary to the residential use of the dwelling, See section 04.290

**02.600 Host.**

A "Host" must occupy the subject property or a physically contiguous property of a proposed short-term rental location and means a) the property owner or b) an adult relative of the property

owner occupying the property on a long-term basis, or c) a long-term resident of record as established through a valid long-term lease or other written record.

#### **02.610 Hosted rental.**

"Hosted rental" means a short-term rental where the Host is living on site and present during any and all rentals. The residence of the Host must be on the same parcel or a physically contiguous adjacent parcel under the same ownership as the parcel with the rental unit.  
~~The rental unit must be located on the same property as, or on a property physically contiguous with, the residence of the Host.~~

#### **02.620 Hotel.**

"Hotel" means a facility, other than a bed & breakfast, with guest rooms or suites, with or without kitchen facilities, rented to the general public for transient lodging. Hotels typically include a variety of services in addition to lodging, for example, restaurants, meeting facilities, personal services, etc.

#### **02.630 Hotel, resort.**

"Hotel, resort" means a hotel with accessory recreational components, as well as service uses designed primarily for the convenience of guests.

#### **02.640 Industrial park.**

"Industrial park" means a single parcel or group of parcels of land designated to provide for a combination of light and moderate industrial uses that do not in their maintenance, assembly, manufacture, or plant operation create smoke, gas, odor, dust, sound, vibration, soot or lighting to a degree that might be obnoxious or offensive to persons conducting a business in this or any adjacent district. Where applicable, the provisions outlined in Nuisances and Hazards, Section 04.250 shall apply.

#### **02.650 Infrastructure.**

"Infrastructure" means the basic utilities and services necessary to support development; e.g., sewer, water and roads.

#### **02.660 Joint-use parking.**

"Joint-use parking" means the common use of parking space(s) among businesses on the same lot whose operating hours do not overlap.

#### **02.670 Junkyard.**

"Junkyard" means the use of more than 200 sq. ft. of the area of any parcel, lot or contiguous lots for the storage of junk, including scrap metals or other scrap materials and for the dismantling, wrecking or storage of used automobile or vehicles or machinery or parts thereof.

#### **02.680 Kennel.**

- A. Kennel, private. "Private kennel" means any property where dogs and cats over the age of 4 months are kept in accordance with the requirements of Section 04.270 for the use and enjoyment of the occupant for noncommercial purposes.
- B. Kennel, boarding or commercial. "Boarding or commercial kennel" means any facility other than a private kennel, including, but not limited to, a facility for the keeping, boarding, breeding, training and maintaining of more than four dogs of 4 months of age or older, whether for a fee or not, or for sale.



**02.690 Kitchen.**

"Kitchen" means any room, all or part of which is designed or used for cooking and the preparation of food.

**02.700 Land Development Technical Advisory Committee.**

"Land Development Technical Advisory Committee" (LDTAC) means a technical committee consisting of the director of Public Works, the Community Development director and the Environmental Health director, and any other affected County departments, or their designated representatives. This body shall act in a technical capacity to the Commission. This body reviews and makes recommendations on all subdivisions, land divisions, use permits, general plan amendments, land use redesignations and preapplications.

**02.705 Land use designation.**

"Land use designation" is a general category or class of land use activity (e.g., "residential," "commercial" or "industrial") that is permitted to occur on specific parcels of land in the unincorporated area of the county that have been duly assigned that designation by the County pursuant to this Land Use Element of the General Plan. Land use designations are generally described in Section IV of this Land Use Element and their specific assignments to individual parcels of land in the unincorporated area of the county are depicted in the Land Use Maps available at <https://monomammoth.maps.arcgis.com>. Because assigned land use designations essentially create regulatory boundaries or areas within which certain permitted uses may occur, parcels of land are sometimes described under these Land Development Regulations as being located within their assigned land use designations. Except as otherwise expressly provided by these Land Development Regulations, no land may be developed or used except in the manner permitted by its assigned designation. (See Section 01.060 of these Land Development Regulations.) Please see "Section IV. Land Use Designations" for an explanation of dual, split and mixed designation (MD) land use designations.

**02.710 Landscaping.**

"Landscaping" means the use of plant and natural materials, paving materials or structural materials in order to amend and enhance the exterior environment on any parcel, public right of way and easement or to reestablish or reinforce the existing natural environment.

**02.715 Long-term rental.**

"Long-term rental" means any residential dwelling (as defined within this Chapter), or portion of a residential dwelling, which is occupied, or intended to be occupied, for a period of 31 or more consecutive calendar days by persons other than the owner, whether by agreement, concession, permit, right of access, license, contract, payment of rent or otherwise, for purposes of sleeping, lodging or similar reasons in any land use designation. ~~"Long-term rental" means occupancy by persons other than the owner, whether by agreement, concession, permit, right of access, license, contract, payment of rent or otherwise, for a period of 31 or more consecutive calendar days.~~

**02.720 Lot.**

"Lot" means land occupied or to be occupied by a use, building or a unit group of buildings and uses and accessory buildings and uses, together with such yards, open spaces and lot width and area as are required, and having frontage upon a street; or an area or parcel shown on and created by a final or parcel map recorded with the County Recorder.

**02.730 Lot coverage.**

"Lot coverage" means the percentage of a lot encumbered by impervious areas, structures and modifications, including decks. Specified requirements may be modified for substandard lots.

**02.740 Lot, double-frontage.**

"Lot, double-frontage" or through lot means a lot other than a corner lot that has frontage on two parallel or approximately parallel streets. Required front yards shall be measured from both street frontages.

**02.750 Lot depth.**

"Lot depth" means the average horizontal distance between the front and rear lot lines measured in the mean direction of the side lot lines.

**02.760 Lot width.**

"Lot width" means the distance measured at the building setback line along a line or arc that is parallel or concentric to the right of way.

**02.770 Manufactured housing.**

The term manufactured home and mobile home may be used interchangeably in the General Plan, however permitting and use shall be pursuant to State law in regard to its definition of manufactured housing. "Manufactured housing" means a structure, transportable in one or more sections, which, in the traveling mode, is 8 body feet or more in width, or 40 body feet or more in length, or, when erected on site, is 320 or more square feet, and which is built on a permanent chassis and designed to be used as a dwelling with or without a permanent foundation when connected to the required utilities, and includes the plumbing, heating, air conditioning, and electrical systems contained therein; except that such term shall include any structure that meets all the requirements of this paragraph except the size requirements and with respect to which the manufacturer voluntarily files a certification and complies with the standards established under Part 2 of Division 13 (18000 et seq.) of the Health and Safety Code. "Manufactured home" includes a mobile home subject to the National Manufactured Housing Construction and Safety Act of 1974 (42 U.S.C., Sec. 5401, et seq.) (see Health and Safety Code Section 18007).

**02.780 Manufactured-housing subdivision.**

"Manufactured-housing subdivision" means any area or tract of land where two or more lots are created in accordance with applicable provisions of Title 17 of the Mono County Code for the exclusive use of manufactured-housing units that are defined to include mobile homes and factory-built housing.

**02.790 Mobile home.**

The term manufactured home and mobile home may be used interchangeably in the General Plan, however permitting and use shall be pursuant to State law in regard to its definition of mobile home. "Mobile home" means a structure that meets the Health and Safety Code requirements of Health and Safety Code Section 18007. "Mobile home" does not include a commercial coach, as defined in Health and Safety Code Section 18001.8, factory-built housing, as defined in Health and Safety Code Section 19971, or a recreational vehicle, as defined in Health and Safety Code Section 18010 (see Health and Safety Code Section 18008). "Commercial coach" means a structure transportable in one or more sections, designed and equipped for human occupancy for industrial, professional, or commercial purposes, which is required to be moved under permit, and shall include a trailer coach as defined in Section 635 of the Vehicle Code (see Health and Safety Code Section 18001.8).

**02.800 Mobile-home display units.**

"Mobile-home display units" means any mobile home or mobile homes that are used solely for the purpose of displaying units offered for sale by the developer of an approved mobile-home park or subdivision in the area.

Mobile-home display units are deemed to be temporary and shall be removed from the site at the completion of the sales program or upon termination of any permit issued for that use. Mobile-home display units shall not be used at any time for living quarters unless installed on legal mobile-home lots that provide all necessary support requirements.

**02.810 Mobile-home park.**

"Mobile-home park" means any area or tract of land designed as a single unit where two or more mobile-home lots or spaces are rented or leased, or held out for rent or lease to accommodate mobile homes used for dwelling purposes.

**02.820 Modular.**

Refer to factory-built housing definition, Section 02.480.

**02.830 Model home or unit, temporary.**

"Model home or unit, temporary" means any dwelling unit or units that are used solely for the purpose of displaying units offered for sale and that are temporary in nature, the unit or units to be removed from the site at the expiration of any permit issued for the use. Temporary model homes or units shall not be used at any time as living quarters.

**02.840 Motel.**

"Motel" means a building or buildings containing guest rooms or units with associated automobile parking spaces designed and used primarily for the accommodation of transient automobile and other travelers.

**02.850 Nonconforming.**

"Nonconforming" means the existence or use of land, a building, a structure or portion thereof, that does not conform to the regulations of the land development regulations and that lawfully existed at the time the regulations with which it does not conform became effective.

**02.855 Non-Hosted rental.**

"Non-Hosted rental" means a short-term rental where a Host is not required to be present during rentals.

**02.860 Nurseries.**

"Nurseries" means the retail or wholesale handling of any article, substance or commodity related to the occupation of gardening, including the sale of plants, shrubs, trees, packaged fertilizers, soils, chemicals and other nursery goods and related products. The bulk sale or bulk storage of fertilizers, soils, chemicals and other garden supplies shall be within a building.

**02.870 Open space.**

"Open space" means land where basic natural values have been retained. Open space can include wilderness areas as well as a small park in the middle of town, pastures, forested areas, agricultural uses, golf courses, flood washes, ski runs, etc. The function of open space may differ, depending upon the location. It may have a protective function, as in the case of open space in

flood plain areas, where it serves to protect health and safety. It can have a structural or buffer function to space and separate conflicting land uses. It may serve the function of recreation or a scenic function to provide aesthetic views of forests or mountains.

**02.880 Outdoor sales.**

"Outdoor sales" means any retail sales operation conducted either partially or entirely outside, in a motorized vehicle, or temporary structure (i.e., tent, vegetable stand, etc.).

**02.890 Overlay district.**

"Overlay district" means an area within which a set of standards and requirements are employed to deal with special physical characteristics such as hazardous areas. Overlay districts are sometimes described in the general or area plans and are mapped and/or imposed in conjunction with, and in addition to, those of the underlying land use designation.

~~Transient Rental Overlay Districts (TRODs), Use Permit,~~ **02.900 Parking space.**

"Parking space" means a usable space on the building site at least 10' x 20' if over 7,000' elevation and at least 9' x 18' if covered or under 7,000' elevation. Such space shall be located off the street with adequate access to such space.

**02.910 Parking, underground structure.**

"Parking, underground structure" is an improved, covered parking lot built beneath the structure that it primarily serves, and not extending more than 5 feet above the finished grade. Building height is then measured from the top of the underground parking structure.

**02.912 Permitted Use.**

"Permitted use" means a typical land use that is allowed within a particular land use category; permitted uses listed for each land use designation are *examples* of permitted uses within that designation. Additional specific uses may be permitted if they are similar to the listed uses; see 04.020-04.050. A permitted use is considered to be consistent with the objectives of the General Plan. Permitted uses may also be subject to performance or other development standards, applicable area or specific plans, and either ministerial or discretionary approval.

**02.915 Pool.**

"Pool" means a man-made structure containing water and open at the surface that is installed permanently within the ground. A pool may be used for human use, aesthetics or otherwise.

**02.920 Poultry farms.**

"Poultry farms" means the raising and/or keeping of chickens, ducks, geese, pigeons, pheasants, or guinea fowl for commercial purposes.

**02.930 Professional office.**

"Professional office" means an establishment for professional, executive or administrative offices, including those of accountants, lawyers, medical doctors, dentists, architects, engineers, drafting offices, insurance agents, real estate agents and other occupations that are of similar character to those enumerated, but not including barbers, beauty salons, cosmetologists or other service establishments or building trades contractors.

**02.940 Public buildings and uses.**

"Public buildings and uses" means any civic- or service-oriented facility available to the general public including such uses but not limited to schools, parks, playgrounds, educational,

recreational and social facilities, libraries, museums, firehouses, courthouses, administrative offices, hospitals and other governmental facilities.

**02.950 Public utility buildings, structures and uses.**

"Public utility buildings, structures and uses" means the use of land for public utility purposes by public, quasi-public and private energy and communication purposes and distributors except for conventional electrical distribution substations and facilities. Hydroelectric, geothermal power plant construction, and cell/communication towers are considered to fall within this definition.

**02.960 Quasi-public buildings and uses.**

"Quasi-public buildings and uses" means a use operated by a private nonprofit educational, religious, recreational, charitable, fraternal or medical institution, association or organization, and including but not limited to such uses as churches, private schools, universities, community recreational, educational and social facilities, meeting halls, private hospitals and similar uses.

**02.970 Recreational vehicle.**

"Recreational vehicle" means a motor home, travel trailer, truck camper, or camping trailer, with or without motor power, designed for human habitation for recreation or emergency occupancy, which is 8 feet or less in overall width and 40 feet or less in overall length, or a bus conversion for human habitation, and for which a special permit and/or chauffeur's license is not required by the California Vehicle Code to move such vehicle on a public highway.

**02.980 Recreational-vehicle park.**

"Recreational-vehicle park" means any area or tract of land where two or more lots or spaces are rented or leased, or held out for rent or lease to owners or users of recreational vehicles that are occupied for temporary purposes or seasonal use. A recreational-vehicle park may allow the use of tents or other temporary camping facilities either in place of a recreational vehicle or in a separate designated area within its confines and considered as part of the number of approved lots or spaces in the park. In addition, an "RV" park normally contains provisions for electrical and sanitary hookups.

**02.990 Scenic Highway.**

"Scenic Highway" means any freeway, highway, route, road, street, boulevard, or other public right of way that traverses an area of land generally adjacent to (within 1,000 feet) and visible from the highway, which requires protective measures to ensure preservation of its scenic qualities.

**02.1000 Scenic Highway Corridor.**

"Scenic Highway Corridor" means the area of land generally adjacent to (within 1,000 feet) and visible from the highway, which requires protective measures to ensure preservation of its scenic qualities.

**02.1010 Screening.**

"Screening" means the use of fences, hedges, and walls as well as earth mounds and the massing of trees and shrubs in order to mitigate visual nuisance generated by specific land uses and to protect the amenities of abutting land use districts in accordance with the intent of those districts.

**02.1020 Service station.**

"Service station" means a retail business establishment limited to the sale of motor fuels and supplying goods and services generally required in the operation and maintenance of automotive vehicles. These may include sale of petroleum products; sale and servicing of tires, batteries, automotive accessories and replacement items; washing and lubrication services; the performance of minor automotive maintenance and repair. Major automotive repairs, painting, and body and fender work are excluded except where such uses are otherwise permitted in the district.

#### **02.1030 Setback line, street.**

"Setback line, street" means a line that defines the depth of the required street setback, front yard, side yard or side street where said yard or yards abut a street. Said street setback line shall be parallel or concentric with the street right-of-way line.

#### **02.1035 Short-term rental.**

"Short-term rental" means any residential structure dwelling (as defined within this Chapter), or portion of a residential structure dwelling, which is occupied, or intended ~~or designed~~ for occupancy, on a short-term basis for purposes of sleeping, lodging or similar reasons in any land use designation. "Short-term" means occupancy by persons other than the ~~owner~~ Host, whether by agreement, concession, permit, right of access, license, contract, payment of rent or otherwise, for a period of 30 or fewer consecutive calendar days. Prior to GPA 25-01 (insert date of GPA 25-xx approval), For the purposes of the Mono County General Plan, the term "short-term rentals" ~~applies~~ applies to such uses in residential land use designations only (governed by Chapter 25 and Mono County Code Chapter 5.65), in contrast to "transient rentals," which occurred on non-residential designations. After this date, the term "short-term rentals" applies to such uses in all land use designations.

#### **02.1040 Sign.**

"Sign" means any words, letters, numerals, emblems, designs, or other marks shown on any card, cloth, paper, metal, painted surface, glass, wood, plaster, stone or other device of any kind or character by which anything is made known and used to attract attention.

#### **02.1042 Single Room Occupancy.**

"Single room occupancy" (SRO) means a facility providing six or more dwelling units where each unit has a minimum floor area of one hundred fifty (150) square feet and a maximum floor area of four hundred (400) square feet. These dwelling units may have kitchen or bathroom facilities and shall be offered on a monthly basis or longer. SROs are a land use similar to apartments and condominiums.

#### **02.1045 Site disturbance.**

"Site disturbance" means the portion of a parcel that has been changed from its natural condition during the process of development, including but not limited to areas altered by structures, parking areas, roads and driveways, and graded areas. It does not include areas used for agricultural operations. Land that has been disturbed but that has subsequently been reclaimed or revegetated is not counted in the calculation of site disturbance. "Site disturbance" includes the area considered as lot coverage (structures and impervious surfaces). Lot coverage and site disturbance are calculated using gross coverage/disturbance for parcels one acre or more in size; and net coverage/ disturbance for parcels under one acre in size.

**02.1050 Site plan.**

"Site plan" means a plan, prepared to scale, showing accurately and with complete dimensions all of the uses proposed for a specific parcel of land taking into consideration the natural and man-made characteristics of the parcel.

**02.1060 Site plan review.**

"Site plan review" means the review by the County of a site plan and other studies to assist the County in determining the manner in which the applicant intends to make use of his property.

**02.1063 Small-scale agriculture.**

"Small-scale agriculture" means gardens and orchards producing food for human consumption that do not exceed 10% of the total lot area. Such agriculture may be for personal or community use. Landscaping is not considered small-scale agriculture.

**02.1065 Snow storage area.**

"Snow storage area" means an area set aside for the storage of snow. The area may be landscaped, paved or covered with natural vegetation. See Section 04.300, Snow storage requirements.

**02.1070 Social care facility.**

"Social care facility" means any facility in the general classification of a boarding home for aged persons, boarding home for children, day care home for children, day nursery, nursing home or parent-child boarding home. These facilities consist of a building or group of buildings used or designed for the housing of sick, demented, injured, convalescent, infirm or well, normal healthy persons, requiring licensing or certification by regulating government agencies.

**02.1080 Special event.**

"Special event" means any organized activity, event, procession, or assemblage of persons for which there is not an outstanding use permit, that is held over a temporary or limited number of days. See Mono County Code Chapter 5.50.

**02.1090 Stable, private.**

"Stable, private" means a detached accessory building for keeping of horses, burros or mules that are owned by the occupants of the premises. Private stable buildings are not otherwise available for rent or boarding purposes

**02.1100 Stable, public.**

"Stable, public" means a stable other than a private stable for keeping of horses.

**02.1110 Street line.**

"Street line" means the boundary between a street, public or private, and abutting property.

**02.1120 Street, public.**

"Street, public" means a street, road or way, but not an alley; dedicated to, owned by or maintained by a state, county or incorporated city.

**02.1121 Strip commercial.**

"Strip commercial" is a form of commercial development in which each establishment is afforded direct access to a major thoroughfare through a shared parking lot; generally associated with intensive use of signs to attract passersby.

**02.1130 Structural alterations.**

"Structural alterations" means any change in the supporting members of a building, such as a bearing wall, column, beam or girder, floor or ceiling joists, roof diaphragms, foundations, pipes or retaining walls.

**02.1140 Structure.**

"Structure" means anything that is built or constructed (definition from the California Building Code), but for the purposes of this General Plan shall not include fences under 7 feet in height and retaining walls less than 4 feet in height.

**02.1141 Square Footage.**

"Square Footage," for the purposes of General Plan policies, shall be calculated based on the exterior foundation footprint of the unit. All interior space, whether habitable, conditioned, or otherwise, shall count toward the total square footage of the unit.

**02.1150 Subdivision.**

"Subdivision" means the division, by any subdivider of any unit or units of improved or unimproved land, or any portion thereof, shown on the latest equalized County assessment roll as a unit or as contiguous units for the purpose of sale, lease or financing whether immediate or future except for leases of land for agricultural purposes. Property shall be considered contiguous even if it is separated by roads, streets, utility easement or railroad rights of way. Subdivision includes a condominium project, as defined in Section 1350 of the Civil Code, a community apartment project, as defined in Section 11004 of the Business and Professions Code or the conversion of five or more existing dwelling units to a stock cooperative, as defined in Section 11003.2 of the Business and Professions Code. As used in this definition, agricultural purposes mean the cultivation of food or fiber or the grazing or pasturing of livestock.

**02.1160 Substandard lot.**

"Substandard lot" means a unit of land, the area, width or other characteristics that fails to meet the requirements of the land use designation in which it is located.

**02.1165 Supportive housing.**

"Supportive housing" means permanent rental housing linked to a range of support services designed to enable residents to maintain stable housing and lead fuller lives.

**02.1170 Temporary use.**

"Temporary use" is any use or occupation of any building or land for a period of 180 days or less.

**02.1180 Time-share project.**

"Time-share project" is any project in which a purchaser receives the right in perpetuity, for life, or for a term of years, to the recurrent, exclusive use or occupancy of a lot, parcel, unit, or segment of real property, annually or on some other periodic basis, for a period of time that has or will be allotted from the use or occupancy periods.

**02.1190 Time-share estate.**

"Time-share estate" is a right of occupancy in a time-share project that is coupled with an estate in real property.



**02.1200 Time-share use.**

"Time-share use" is a license, certificate or contractual or membership right of occupancy in a time-share project that is coupled with an estate in real property.

**02.1201 Tract housing.**

"Tract housing" is a style of housing development in which multiple identical or nearly identical homes featuring similar color, texture and form are built together on a single tract of land.

**02.1210 Transient rental.**

"Transient rental" means any residential structure dwelling (as defined within this Chapter), or portion of ~~structure~~ a residential dwelling, which is occupied, or intended ~~or designed~~ for occupancy, by transients for purposes of sleeping, lodging or similar reasons. A "transient" is any person who exercises occupancy, whether by agreement, concession, permit, right of access, license, contract, payment of rent or otherwise, for a period of 30 or fewer consecutive calendar days. For the purposes of the Mono County General Plan, the term "transient rental" applies to such uses in non-residential land use designations only prior to GPA 25-01  (date) ~~in non-residential land use designations and MFR-H (governed by those designations and Chapter 26), in contrast to "short term rentals."~~ This term is no longer used for new approvals after GPA 25-01  (date).

**02.1215 Transitional housing.**

"Transitional housing" means a type of supportive housing used to facilitate the movement of homeless individuals and families to permanent housing.

**02.1220 Travel trailer.**

"Travel trailer" means a recreational vehicle. See Section 02.970.

**02.1230 Use.**

"Use" means the purpose for which land or a building thereon is designed, arranged or intended, or for which it is or may be occupied or maintained.

**02.1240 Use, accessory.**

"Use, accessory" means a use accessory to any permitted use and customarily a part thereof, which use is clearly incidental and secondary to the permitted use and which does not change the character thereof.

**02.1245 Visitor rentals.**

"Visitor rentals" means all permitted short-term rentals, vacation home rentals and transient rentals including, but not necessarily limited to, approved via Transient Rental Overlay Districts (TRODs), Short-Term Rental Activity Permits, Vacation Home Rental Permits, Use Permits, or by-right with a business license and transient occupancy tax certificate. "Visitor rentals" does not include traditional lodging facilities.

**02.1250 Yard.**

"Yard" means an open space other than a court on the same building site with a building, which open space is unoccupied and unobstructed from the ground upward, not including any portion of any street or alley or road right of way.

**02.1260 Yard, front.**

"Yard, front" means that portion of the lot adjacent to a street right of way, extending between the side lot lines to a depth required by the district in which the lot is located.

**02.1270 Yard, rear.**

"Yard, rear" means a yard extending across the back of the lot between the side lot lines and to a depth required by the district in which the lot is situated.

**02.1280 Yard, side.**

"Yard, side" means a yard along the side line of the lot and to a width required by the district in which the lot is situated, and extending from the front yard to the rear yard.

## DEVELOPMENT STANDARDS

## CHAPTER 25 – SHORT-TERM RENTALS

## Sections:

**25.010 Intent.****25.02015 General Requirements and Applicability.****25.03018 Exemptions**~~Previous Permit Approvals.~~**25.0420 Establishment of Owner-Occupied**~~Hosted~~ Short-Term Rentals.**25.035050 Establishment of Not Owner-Occupied**~~Non-Hosted~~ Short-Term Rentals.**25.040060 Notice requirements.****25.0750 Uses permitted.**~~25.060 Uses permitted subject to director review~~~~25.070 Uses permitted subject to use permit~~~~25.080 Additional requirements~~**25.010 Intent.**

In recognition of the demand by visitors for diverse lodging options, this Chapter is intended to establish a process to permit short-term rentals in for single family residential dwellings units regardless of land use designation. ~~that do not exhibit reasonable opposition by neighbors who may be directly affected, and when consistent with applicable Area Plan policies.~~

**25.02015 General Requirements and Applicability.**

- A. This Chapter applies to any overnight visitor or short-term rental (in any single family unit as defined in Chapter 2 of the Land Use Element) in all land use designations and which has with a the following land use designations: C, CL, ER, MU, MFR H, NHP, RMH, RR, RU, and SFR.) ~~(s) of SFR, ER, RR, or RMH in all communities except June Lake. In June Lake, this chapter applies only to SFR designations; short term rentals in other residential land use designations other than SFR in June Lake are prohibited not permitted~~
- B. Short-term rentals covered by this Chapter are subject to a Use Permit (see Chapter 32) and a Short-Term Rental ~~(STR)~~ Activity Permit (STR Activity Permit) under Mono County Code Chapter 5.65 unless otherwise exempted.
- C. Unless explicitly stated ~~s~~ otherwise in this Chapter, short-term rentals covered by this Chapter shall operate in compliance with this Chapter, Chapter 5.65 of the Mono County Code, and all applicable Area Plan policies,<sup>14</sup> and must exhibit no reasonable opposition from neighbors within 500 feet of the subject parcel.
- D. Pursuant to Chapter 5.65 of the Mono County Code and the required ~~Short-Term Rental~~ STR Activity Permit, short-term rentals covered by this Chapter shall be specific to the owner and shall terminate upon a change of ownership.
- E. ~~STR use permits for Short term rentals~~ Visitor rental permits shall be limited to one per parcel and one per person regardless of whether the ownership interest is in whole or in part. , except as provided for in the CL land use designation ~~In other words, an STR~~ a use permit for a Sshort-term rental shall not be approved if a person with an ownership interest in the property, whether in whole or in part, has an existing STR use permit for a Short term rental on another property visitor rental within Mono County.
- F. Applicants for a use permit for a Sshort-term rental must demonstrate that creation of a Sshort-term rental would not negatively impact long-term housing stock.
- G. Short-term rental of an ADU Accessory Dwelling Unit (ADU) or Junior Accessory Dwelling Unit (JADU) is prohibited (see Chapter 16 of the Land Use Element).

- H. Any person or entity that leases, rents, or otherwise makes available for compensation, a residential unit approved pursuant to this Chapter, for a period of ~~fewer than~~ thirty (30) or fewer days, must first comply with this Chapter and all applicable requirements prior to operating.
- I. Parcels located within conditional development zones (avalanche) shall not be allowed to offer or operate short-term rentals during the avalanche season, November 1 through April 15.
- J. Any form of advertising or listing for rent of an unpermitted short-term rental unit is a violation of this Chapter.

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<sup>14</sup> See Antelope Valley, Mono Basin, June Lake, Crowley Lake/Long Valley, Wheeler Crest, Paradise, and Tri Valley (Benton, Hammil Valley and Chalfant Valley) Area Plan policies. This list is current as of Jan. 2019 August 2024.

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DRAFT

**25.03018 Previous Permit Approvals.—Exemptions**

~~Overnight~~Visitor ~~Short term~~ rentals approved ~~prior to GPA 25-01~~ under previous permit processes regulations ~~(date)~~ are permitted to operate as originally approved. Upon transfer or sale of the property, approvals that run with the land (e.g., TROD overlay, use permit) remain in effect but new approvals specific to the new owner including, but not limited to, an STR Activity Permit, business license, and transient occupancy tax (TOT) certificate are required. ~~considered existing non-conforming uses subject to the provisions of Chapter 34.~~ Previous permitting mechanisms include, but are not limited to, the following:

A. ~~Transient Rental Overlay Districts (implemented through General Plan Amendments)~~ ~~Existing non-conforming uses with approvals that run with the land are therefore exempt from this Chapter. The regulations under which the use was approved continue to apply. These approvals include, but may not be limited to, the following parcels:~~

~~B.A. APNs under Transient Rental Overlay Districts (TRODs):~~ 016-094-012, 016-094-011, 016-094-010, 016-098-016 (GPA 13-001), 019-140-011, 016-098-011, 016-096-005 (GPA 13-002); 015-140-035, 015-140-034, 015-140-033, 015-140-032 (GPA 13-004); 016-102-052 (GPA 14-001); 015-010-080, 015-300-006 (GPA 14-002).

~~Approval by APNs under Use Permit only:~~ includes, but may not be limited to, the following parcels: 060-120-005 (UP 17-004), 008-132-027 & 008-132-017 (UP 17-005), 060-210-062 (UP 17-011), 060-180-018 (UP 17-012), 060-240-010 (UP 17-013).

B.

C. ~~Overnight~~Visitor rentals ~~Short Term Rental Existing non-conforming uses that were allowed by right and without permits do not run with the land and require full compliance with these short-term regulations (e.g., new use permit, STR Activity Permit, business license, TOT certificate) upon sale or transfer of the property to a new owner. These situations include, but are not limited to, condominium units previously approved by-right with a Vacation Home Rental permit and business license and TOT certificate.~~

**25.04020 Establishment of Hosted Owner-Occupied Short-Term Rentals.**

A. ~~Owner-occupied~~Hosted short-term rentals require ~~the owner~~a verified Host to live on site, ~~and be present during any rentals.~~ ~~or~~ ~~+~~The rental unit must be associated with an ~~owner-occupied~~Hosted principal residence on the same parcel or a physically contiguous adjacent parcel ~~under the same ownership.~~ A Hosted rental may include:

1. Rental of a portion of a dwelling unit, with a minimum of a sleeping room with shared full bathroom; or

~~1.—Rental of an entire dwelling unit, not including an Accessory Dwelling Unit (ADU) or Junior Accessory Dwelling Unit (JADU) as defined by the State~~Chapter 2 of the Mono County General Plan Land Use Element.

2.

~~2.3.~~Short-term rental of the main unit while ~~the Host~~a long-term tenant occupies an ADUAccessory Dwelling Unit or a JADUJunior Accessory Dwelling Unit is allowable~~ed.~~

B. Rental is limited to a single party of individuals.

**25.0530 — Establishment of Not Owner-Occupied Non-Hosted Short-Term Rentals.**

~~Not owner—~~“Non-Hosted rental” means a short-term rental where a Host is not required to be present during rentals (Mono County General Plan Land Use Element § 02.855). ~~Non-Hosted~~occupied short-term rentals include rental of an entire dwelling unit or any part thereof that ~~does is not function as the concurrently occupied primary residence of a by the owner Host, whether or on the same parcel or on a physically contiguous parcels a principal residence concurrently occupied by the owner.~~

**25.0640 — Notice requirements.**

A. Notice of an STR Activity Permit ~~short-term rental~~ application shall be given to owners of surrounding properties and published in a newspaper of general circulation 30 days in advance of a public hearing.

B. “Surrounding property,” for the purposes of this planning permit, shall be defined as those properties that fall within a 500-foot radius measured from the nearest limits of the project parcel that is the subject of the land use application. If a contiguous parcel (or parcels) is under the same ownership as the project parcel, the 500-foot radius shall be measured from the limits of all contiguous parcels under the same

ownership. If a property is located more than 500 feet from the boundary of the parcel but may be directly affected by any land use application on the subject parcel, then that property owner may also be noticed at the discretion of the Community Development Department. Further, any property owners or residents, regardless of their location or proximity to the parcel subject to a land use application, may receive notice if they submit their request in writing to the Planning Division more than 10 days in advance of the hearing. Such notice shall be given at least 10 days in advance of the hearing by mail, electronic mail, or other noticing means pursuant to the California Government Code, to all persons whose names and addresses appear on the latest adopted tax roll of the County or have made a written request for notice under this section.

#### **25.0750 Uses permitted.**

Nothing in this chapter modifies the uses permitted, uses permitted subject to director review, or uses permitted subject to use permit in the project's underlying land use designation. The following uses shall be permitted with a short-term rental approval, plus such other uses as the Commission finds to be similar and not more obnoxious or detrimental to the public safety, health and welfare:  
~~All uses permitted in the underlying land use designation.~~

~~Where the principal use of the subject parcel(s) is single-family residential, the A primary residence or any accessory dwelling unit on the parcel(s) may be rented on a short-term basis subject to the requirements of 25.070.~~

#### **25.060 Uses permitted subject to director review.**

~~All uses permitted subject to director review in the underlying land use designation with which the short-term rental is combined shall be permitted, subject to director review approval.~~

#### **25.070 Uses permitted subject to use permit.**

~~All uses permitted subject to use permit in the underlying land use designation with which the short-term rental is combined shall be permitted, subject to use permit approval.~~

#### **25.080 Additional requirements.**

~~Any person or entity that leases, rents, or otherwise makes available for compensation, a single-family residential unit approved pursuant to this chapter, for a period of fewer than thirty (30) days, must first obtain a Short-Term Rental Activity Permit pursuant to Mono County Code Chapter 5.65 and comply with all applicable requirements of that permit prior to operating.~~

~~Parcels located within conditional development zones (avalanche) shall not be allowed to offer or operate short-term rentals during the avalanche season, November 1 through April 15.~~

~~Any form of advertising or listing for rent for an unpermitted short-term rental unit is in violation of this chapter.~~

## DEVELOPMENT STANDARDS

### CHAPTER 26 – TRANSIENT RENTAL STANDARDS & ENFORCEMENT IN NONRESIDENTIAL AND MFR-H LAND USE DESIGNATIONS AND TRODS

#### Sections:

26.010	<b>Purpose and Findings.</b>
26.015	<b>Applicability.</b>
26.020	<del>Vacation Home Rental Permit</del> <u>Unpermitted Transient Rentals.</u>
26.030	<b>Application and Issuance of a Vacation Rental Permit.</b>
26.040	<b>Standards and Requirements.</b>
26.050	<b>Rental Agreement and Owner Responsibility.</b>
26.060	<b>Compliance with Transient Occupancy Tax Requirements.</b>
26.070	<b>Enforcement.</b>
26.080	<b>Unauthorized Rentals Prohibited.</b>

#### 26.010 Purpose and Findings.

- A. The purpose of this eChapter is to ~~implement procedures, provide ongoing~~ restrictions, and regulations related to land uses for transient rentals; provide for the payment of transient occupancy tax and applicable fees for the transient rental of properties within Transient Rental Overlay Districts (TRODs), and non-residential land use designations and MFR-H where the use ~~was previously allowed~~ is listed; and provide enhanced enforcement tools to address unauthorized transient rentals countywide.
- B. The Board of Supervisors finds that the County allowed transient rentals to be established within areas of the county designated as TRODs ~~and in~~ non-residential designations and MFR-H ~~to will~~ provide a community benefit by expanding the number and types of lodging available to visitors to Mono County, increasing the use of property within the county, and providing revenue to property owners so that the units may be maintained and upgraded.
- ~~B.C.~~ The Board of Supervisors also finds that the County would benefit from a single, unified system to regulate short-term rentals, regulated through amendments to Land Use Element Chapter 25 and Mono County Code Chapter 5.65, and to discontinue issuing new Vacation Home Rental Permits.
- ~~C.D.~~ The Board of Supervisors also finds that this eChapter is needed to ensure the ongoing operation of previously -permitted transient rentals within non-residential designations and MFR-H should be are regulated to minimize fire hazard, noise, traffic, and parking conflicts and disturbance to the peace and quiet. The Board further finds that current the enforcement tools contained herein are needed have been ineffective to prevent address the illegal operation of transient rentals countywide, primarily because the penalty amount is easily offset by the revenue such uses generate.

#### 26.015 Applicability.

- ~~A. This chapter shall apply to Transient Rental Overlay Districts, nonresidential land use designations where short-term rentals are permitted by Director Review or Use Permit, and Multi Family Residential – High-land use designations where short-term rentals are permitted by Use Permit. Existing Vacation Home Rental Permits issued~~ visitor rentals permitted prior to the effective date of Ordinance (ORD 24 – GPA 25- (date) shall remain valid provided the properties and/or operations meet the following criteria:

1. Property and/or operations remain compliant with the standards set forth in this eChapter;



2. For properties within non-residential designations and MFR-H, the property owner remains the same and no sale or transfer of ownership occurs.

B. Any revocation of a Vacation Home Rental Permit and/or visitor rental business license shall render the permit authorization to rent invalid, and no renewal of a Vacation Home Rental Permit may be allowed.

A.C. Any change of ownership of a property, or partial change of ownership, shall invalidate the Vacation Home Rental Home Permit and/or visitor rental business license and require new approvals specific to the new owner including, but not limited to, an STR Activity Permit, business license, and transient occupancy tax certificate.;

#### **~~26.020 — Vacation Home Rental Permit.~~**

~~Any person who rents a residential structure that is not a condominium (hereinafter “rental unit” or “property”) within an area of the county designated as a transient overlay district or in a non-residential land use designation and MFR H where the use is listed shall comply with the provisions of this chapter, the Mono County General Plan, and any applicable area plans or specific plans. Transient rental, or advertisement of a transient rental, of a private residence within a transient overlay district or in a non-residential land use designation, including MFR H, without a valid vacation home rental permit is a violation of this chapter.~~

#### **26.020 Unpermitted Transient Rentals.**

Transient rental, or advertisement of a transient rental, of a private residence within a transient rental overlay district or in a non-residential land use designation, including MFR-H, without a valid Vacation Home Rental Permit is a violation of this Chapter.

#### **26.030 Application and Issuance of a Vacation Home Rental Permit.**

As of the effective date of Ordinance GPA (ORD254- (date), no new Vacation Home Rental Permits may be issued. Applicant. ~~An applicant for a vacation home rental permit shall be either the owner of title to the subject property or his or her expressly authorized representative. The authorization shall be in writing and notarized.~~

~~A. Application. An application for a vacation home rental permit shall be on a form that may be obtained from the Department of Finance or the Community Development Department. The following requirements and approvals must be met and substantiated before a vacation home rental permit will be issued:~~

- ~~1. The rental unit must be located within an area of the County designated as a transient overlay district or a non-residential land use designation or MFR H where the use is listed;~~
- ~~2. The rental unit must comply with the standards and requirements as set forth in section 26.040, and any other requirement provided by this chapter. An inspection to verify compliance with such requirements shall be the responsibility of the owner or designated property manager. The owner or property manager shall certify in writing, under penalty of perjury, the rental unit's conformance to such standards. Such certification shall be submitted to the Mono County Community Development Department prior to permit issuance;~~
- ~~3. The applicant must designate the management company or property manager for the rental unit who will be available on a 24-hour basis to address any problems that may be associated with the property or the transient users of the property. The management company or property manager must be duly licensed and shall be in good standing with the County. A person or organization in good standing is regarded as having complied with all their explicit obligations, while not being subject to any form of sanction, suspension or disciplinary censure. Alternatively, the property owner may serve as the property manager;~~



- ~~4. The property must be certified by the Community Development Department as complying with parking requirements and any applicable land use regulations set forth in the Mono County General Plan;~~
- ~~5. A Mono County business license must be obtained by the owner and must remain active during all times that the property is used as a transient rental;~~
- ~~6. Any required fees must be paid in full;~~
- ~~7. A Mono County Transient Occupancy Certificate must be obtained by the owner from the Department of Finance and will be issued at the time the vacation home rental permit is issued and all conditions of approval have been met; and~~
- ~~8.1. The Vacation Home Rental permit number shall be posted in the title of every short term rental advertisement, whether online or in other promotional or advertising materials.~~

#### **26.040 Standards and Requirements.**

The following standards and requirements must be met to ~~maintain~~ obtain a Vacation Home Rental Permit in good standing. An inspection to verify compliance with such requirements shall be the responsibility of the owner or designated property manager.

- A. Health and Safety Standards. The purpose of these standards is to establish minimum requirements to safeguard the public safety, health, and general welfare from fire and other hazards, and to provide safety to firefighters and emergency responders during emergency operations. These standards include without limitation:
  1. The address of the rental unit must be clearly visible;
  2. Carbon monoxide and smoke detectors must be installed and maintained in good operating condition in each bedroom, sleeping area, or any room or space that could reasonably be used as a sleeping area, and at a point centrally located in the corridor or area giving access to each separate sleeping room;
  3. All stairs, decks, guards, and handrails shall be stable and structurally sound;
  4. The rental unit shall be equipped with a minimum of one 2A:10B:C type fire extinguisher with no more than 75 feet of travel distance to all portions of the structure; there shall be no fewer than one such extinguisher per floor. Fire extinguishers shall be mounted in visible locations with the tops of the fire extinguishers mounted between ~~three~~ 3 and ~~five~~ 5 feet above the floor and shall be accessible to occupants at all times. California State Fire Marshal annual certification tags must be provided and be current on all extinguishers;
  5. If there is a fireplace or solid-fuel barbecue, the rental unit shall be equipped with a minimum five-gallon metal container with a tight-fitting lid for ash removal. This container shall be clearly labeled and constructed to meet the purpose of containing ash. Instructions on the proper disposal of ash shall be stated in the rental agreement and clearly posted in the rental unit. The ash container shall not be placed on or near any furniture or other combustible material; ashes must be wet down thoroughly with water; the ash can must be stored outdoors with a minimum of three feet clearance from building, porch, trees, and other combustible materials; the lid must remain on the ash container when in use;
  6. Wall or baseboard heaters in the rental unit shall be in good working condition, and

instructions on the proper use of these units shall be clearly stated in the rental agreement and posted in the rental unit;

7. Furniture and any other material that may be flammable shall be kept a minimum of 54 inches from any fireplace opening and 30 inches from any wall or floor heaters;
8. Flammable or hazardous liquid or materials, firearms, controlled substances, or any unlawful material shall not be stored in the rental unit;
9. The roof and grounds of the ~~transient~~ rental ~~property~~ property shall be kept clear of accumulations of pine needles, weeds, and other combustible materials;
10. Any locking mechanism on exterior doors must be operable from inside the unit without the use of a key or any special knowledge. If the dwelling unit is greater than 3,000 square feet in area, two exit doors shall be required, each of which shall conform to this requirement;
11. All fixtures, appliances, furnaces, water heaters, space heaters, plumbing, wiring, electrical, propane or gas connections, doors, windows, lighting, and all parts of the structure and furnishings (interior and exterior) must be in operable working condition and repair;
12. If telephone service is available, there shall be a telephone connected to the local carrier and in working condition for use in the event of an emergency or to contact the owner or property manager. The phone shall be connected to the reverse 911 directory. If there is no telephone service available, then the rental agreement must so state;
13. Bedroom windows shall be operable and free of obstructions to allow for emergency escape and rescue;
14. There shall be at least one screened window per bedroom to allow proper ventilation;
15. All utilities (electric, gas, water, sewage, etc.) shall be connected, in good operating condition, and connected to approved sources;
16. Any hot tubs, pools, and spas shall be fenced or equipped with a cover with locking mechanisms, and shall be maintained in a safe and sanitary condition;
17. There shall be no evidence of pest infestations, and all firewood and other stored items shall be kept in a neat and clean condition;
18. Exits shall be kept free from storage items, debris or any impediments at all times;
19. No tree limbs are allowed within 10 feet of any chimney or flue openings;
20. Spark arresters of a minimum opening size of 3/8-inch and a maximum opening size of 1/2-inch shall be required on all fireplace flue openings; and
21. If any applicable law, rule, or regulation enacted after the enactment of this ~~e~~Chapter imposes requirements more stringent than those set forth herein, such requirements shall apply.

#### B. Sign and Notification Requirements.

1. Exterior Sign and Notice. Each rental unit shall be equipped with one temporary exterior

identification sign not to exceed 8 ½ x 11 inches in size that shall be posted while the unit is being rented on a transient basis. This identification sign shall be placed in a location that is clearly visible from the front entrance of the unit and may be illuminated in a manner that does not conflict with any County exterior lighting standards or signage standards. This sign shall clearly state the following information in lettering of sufficient size to be easily read:

- a. The name of the managing agency, agent, property manager or owner of the unit and the telephone number where said person or persons can be reached on a 24-hour basis;
- b. The maximum number of occupants permitted to stay in the unit; and
- c. The maximum number of vehicles allowed to be parked on the property. A diagram fixing the designated parking location shall be included.

2. Interior Notice. Each rental unit shall have a clearly visible and legible notice posted within the unit adjacent to the front door that shall contain the same information set forth above, and shall additionally include the following:

- a. Notification and instructions about the proper disposal of trash and refuse, including any bear-safe disposal requirements;
- b. Notification and instructions concerning the proper use of any appliances, fireplaces, heaters, spas, or any other fixture or feature within the unit;
- c. Notification that failure to conform to the parking, trash disposal and occupancy requirements for the rental unit shall be a violation of this eChapter and may result in immediate removal from the premises and administrative, civil or criminal penalty;
- d. Notification that any violation of rules or regulations set forth in the rental agreement may be a violation of this eChapter and may result in immediate removal from the premises and administrative, civil or criminal penalty; and
- e. Physical street address of the unit and emergency contact information consisting of 911, the property manager's phone number, and contact information of the local fire department and the Mono County Sheriff's Department; and
- f. An evacuation plan and a statement regarding respect for adjacent property owner's rights, neighborhood character, and trespassing concerns.

3. Permit Number. The Vacation Home Rental Permit number shall be posted in the title of every short-term transient rental advertisement, whether online or in other promotional or advertising materials.

C. Occupancy. The maximum number of persons who may occupy the property as transient renters or their overnight guests shall be limited to two persons ~~(2)~~ per bedroom plus two additional persons. In no event may the maximum occupancy exceed 10 persons in any rental unit unless the unit is certified and approved by the Mono County Building Official as meeting all applicable building standards for such occupancy. Additionally, occupancy may be further restricted by the limitation of the septic system serving the dwelling as determined by Mono County Environmental Health.

D. Parking. Parking requirements shall be based on the parking requirements set forth in the Mono County General Plan, and the number of vehicles shall not exceed the number of parking spaces. Parking requirements for the rental unit shall be noticed in the rental agreement and posted on and in the unit.

There shall be no off-site or on-street parking allowed, and parking on property owned by other persons shall be considered a trespass. A violation of this section may subject any person to administrative, civil and criminal penalty, including fines and towing of any vehicle, as authorized by state and local law.

- E. **Trash and Solid Waste Removal.** A sufficient number of trash receptacles shall be available. Trash and other solid waste shall not be allowed to accumulate in or around the property and shall be removed promptly to a designated landfill, transfer station or other designated site. For purposes of this paragraph, promptly shall mean at least one time per week during any week that the unit is occupied, regardless of the number of days it is occupied. Any trash receptacles located outside a unit shall be in bear-proof containers (in areas with bears) and comply with County standards. Trash removal requirements for each rental unit shall be included in the rental agreement and posted on and in the property. Property management shall be responsible for the cleanup if the tenants do not properly dispose of trash in bear-proof containers.
- F. **Snow Removal.** Snow removal from driveways, walkways, stairs, decks, and all exits and entrances shall be performed prior to each occupancy period, and during any occupancy period as needed to maintain the functionality of these areas. Snow removal from driveways, pathways, exits and entrances, and removal of snow, ice, and ice dams from roofs, decks, and stairs shall be performed in a timely manner as necessary to protect any person who may be using or visiting the rental unit.
- G. **Exterior lighting fixtures shall comply with Chapter 23 – Dark Sky Regulations, which shall require existing fixtures to be replaced or retrofitted, if necessary, to comply.**
- H. A Mono County business license and transient occupancy tax certificate must remain active during all times that the property is used as a transient rental.

## **26.050 Rental Agreement and Owner Responsibility.**

- A. **Rental Agreement.** The ~~temporary-transient~~ rental or use of each rental unit shall be made pursuant to a rental agreement. The rental agreement shall include, as attachments, a copy of this ~~e~~Chapter and the ~~V~~vacation ~~H~~home ~~R~~rental ~~P~~permit for the unit. Each rental agreement shall contain all required notices and shall specify the number of persons who may occupy the unit, parking requirements and number of allowed vehicles, trash disposal requirements, and include the telephone number of the person or persons to be notified in the event of any problem that arises with the rental. The agreement shall include the phone number, address, and contact information for the person responsible for renting the unit, and any other information required by the County. The rental agreement shall notify the renters that they may be financially responsible and personally liable for any damage or loss that occurs from their use of the ~~unit~~rental property, including the use by any guest or invitee. The property manager or owner shall keep a list of the names and contact information of the adult guests staying in the unit.
- B. **Owner Responsibility.**

- 1. The applicant must designate the management company or property manager for the rental unit who will be available on a 24-hour basis to address any problems that may be associated with the property or the transient users of the property. The management company or property manager must be duly licensed and shall be in good standing with the County. A person or organization in good standing is regarded as having complied with all their explicit obligations, while not being subject to any form of sanction, suspension or disciplinary censure. Alternatively, the property owner may serve as the property manager.

- ~~1.~~2. The owner, managing agency, and property manager shall be responsible for compliance with all applicable codes regarding fire, building and safety, health and safety, other relevant laws, and

the provisions of this eChapter.

~~2.3.~~ An owner, managing agency, and/or property manager shall be personally available by telephone on a 24-hour basis to respond to calls regarding the conditions and/or operation of the rental unit. Failure to timely respond in an appropriate manner may result in revocation of the Vacation Home Rental Permit and /or visitor rental business license.

~~3.4.~~ The owner shall require, as a term of a written agreement with a management company or agent, that said agent comply with this eChapter. The owner shall identify the management company or agent, including all contact and license information in the application for a Vacation Hhome Rrental Ppermit, and shall keep this information current. Such agreement shall not relieve owner of the obligation to comply with this eChapter.

~~4.5.~~ The owner shall maintain property liability and fire insurance coverage in an appropriate amount and shall provide proof of such insurance to the County upon timely request. Additionally, the owner shall defend, indemnify, and hold the County harmless from all claims, judgments, liabilities, or other costs associated with the property or the rental unit, or the rental thereof.

~~5.6.~~ The owner, managing agency, property manager and guest(s) shall comply with all lawful direction from any law enforcement officer, fire official, building official, or code compliance officer.

~~6.7.~~ The owner shall be responsible for assuring that the occupants and/or guests of the rental property do not create nuisances such as unreasonable noise or disturbances, engage in disorderly conduct, or violate any law. If an owner, property manager, or other agent of the owner is informed about any violation of this eChapter, the owner, property manager, or owner's agent shall promptly act and use best efforts to stop or prevent a recurrence of such conduct, including, when appropriate, calling law enforcement.

#### **26.060 Compliance with Transient Occupancy Tax Requirements.**

Each owner shall be responsible for ~~obtaining~~ maintaining an active transient occupancy tax certificate and for complying with eChapter 3.28 of the Mono County Code. An owner may contract with a management company or property manager to collect, disburse, report, and maintain all records related to transient occupancy tax, but the owner remains responsible for any failure to collect, disburse, or accurately report such tax.

#### **26.070 Enforcement.**

- A. A violation of any provision of this eChapter, and/or the renting of any property in a land use designation that does not allow for such transient rental, or without proper land use approvals, is subject to the General Penalty provisions and/or the Administrative Citation provisions set forth in Section 1.04.060 and Chapter 1.12 of the Mono County Code, respectively, and any other civil or administrative remedy allowed by law. Notwithstanding Section 1.12.030, the administrative fine for the operation of any transient rental ~~facility within a transient overlay district~~ without a valid Vacation Home Rental Permit and/or visitor rental business license, or the operation of any transient rental facility in violation of applicable land use requirements in any other land use designation of the County shall be \$1,000 for the first violation and \$2,000 for a second or subsequent violation within three years. In addition to these penalty provisions, the failure to comply with any provision of this eChapter may result in the suspension or revocation of the Vacation Home Rental Permit in accordance with subsection D below, or the suspension or revocation of the visitor rental business license and/or transient occupancy ~~registration-tax~~ certificate. The failure of a management company or property manager to comply with the provisions of this eChapter may additionally result in a finding that such management or company or property manager is not in good standing.



- B. An inspection and/or audit of each unit subject to this eChapter, and any contract or agreement entered into in furtherance of, or to implement, this eChapter, may be made at any reasonable time, and upon reasonable notice to confirm compliance with this eChapter.
- C. Transient rentals may not be conducted if there are any code violations, stop-work orders, or other violation of law or regulation outstanding on the property.
- D. The following procedures shall be followed in conjunction with any proposed revocation or suspension of a Vacation Home Rental Permit.
  - 1. The County shall provide the property owner with a written notice of proposed revocation or suspension stating the nature of the violation, whether revocation or suspension is proposed, and the date, time, and place of a hearing before a hearing officer, who shall be a Planning Commissioner appointed for this purpose by the County Administrative Officer, will be held. The notice shall be served on the owner at least 10 business days prior to the date of the hearing by personal service or by certified mail, postage prepaid, return receipt requested to the address for such purpose provided on the Vacation Home Rental Permit application. Service by mail shall be deemed effective on the date of mailing.
  - 2. At the hearing, the hearing officer shall consider any written or oral evidence consistent with the following:
    - a. The contents of the County's file shall be accepted into evidence (except as to such portions of the file, if any, that contain confidential or privileged information); and
    - b. The notice of revocation or suspension shall be admitted as prima facie evidence of the facts stated therein.
  - 3. The hearing officer shall independently consider the facts of the case and shall draw his or her own independent conclusions.
  - 4. Upon conclusion of the hearing and receipt of information and evidence from all interested parties, the hearing officer may immediately render a decision, continue the proceeding or take the matter under submission and later render a decision.
  - 5. If directed by the hearing officer, staff shall prepare a written decision reflecting the hearing officer's determination. Following approval of the written decision by the hearing officer, the secretary of the Planning Commission shall serve the written decision on the property owner by certified mail, postage prepaid, return receipt requested. The decision of the hearing officer shall be the final administrative action of the County, and the property owner shall be advised of his rights to challenge that decision in Superior Court pursuant to Section 1094.5 of the Code of Civil Procedure and of the timelines in which such an action must be brought.
- E. Notwithstanding the foregoing, in the event the code compliance officer determines that suspension or suspension pending revocation of a Vacation Home Rental Permit is necessary for the immediate protection of the public health, safety, or welfare, such suspension may be made without prior hearing or determination by the hearing officer, upon the giving of such advance written notice to the property owner as the code compliance officer deems reasonable given the nature of the violation and risks presented. The code compliance officer shall inform the property owner in writing of the duration of the suspension, the reasons therefor, the procedure and timelines for filing an appeal, in accordance with the following:
  - 1. The property owner may appeal the suspension by filing an appeal with the clerk of the Planning

Commission within 10 calendar days of the date the suspension or revocation takes effect. Such appeal shall also function as a hearing on revocation of the permit, if the suspension is made pending revocation. In the event the property owner does not appeal a suspension pending revocation within the time provided, then the suspension shall automatically become a revocation if notice of such was included in the notice of the suspension;

2. The hearing shall be in accordance with the procedures set forth in Section [26.070\(D\)](#) above; and
  3. The suspension shall remain in effect for the number of days provided by the code compliance officer, or until the appeal/revocation hearing is finally decided by the hearing officer, whichever occurs later, unless extended by the Board.
- F. When a Vacation Home Rental Permit is revoked pursuant to the procedures set forth in this eChapter, [the property shall be subject to Land Use Element Chapter 25 and Mono County Code Chapter 5.65, except that a Short-Term Rental Activity Permit](#) ~~a new vacation home rental permit~~ may not be issued to the same property owner for a period of five years.

#### **26.080 Unauthorized Rentals Prohibited.**

- A. The transient rental of any property, unit, or structure that is not within a designated transient overlay district or within a land use designation that permits such use and for which all necessary approvals have been granted, is prohibited. Any violation of this Section shall be subject to the provisions of Section 26.070, including the fines set forth therein.
- B. Any form of advertising for an unpermitted [transient or](#) short-term rental unit is prohibited.

## Chapter 5.65 REGULATIONS FOR SHORT-TERM RENTALS ~~IN RESIDENTIAL AREAS~~

### 5.65.010 Purpose.

This Chapter provides regulations for the local permitting of short-term rentals (see [Mono County General Plan Land Use Element Chapter 2](#)) under specified conditions within ~~all residential~~ land use designations when authorized by a land use permit issued pursuant to Chapter 25 of the Mono County General Plan Land Use Element: ~~Commercial (C), Commercial Lodging Moderate (CL-M) and High (CL-H), Eestate Residential (ER), Mixed Use (MU), Multi-Family Residential High (MFR-H), Natural Habitat Protection (NHP), Rural Mobile Home (RMH), Rrural Residential (RR), Rural Resort (RU), and Single-Family Residential (SFR).~~

(Ord. No. 18-07, § 1(Att. A), 5-15-2018)

### 5.65.020 Applicability.

This Chapter applies to any person renting, intending to rent, or advertising for rent, on a short-term basis, a residential structure, ~~that is not a condominium,~~ within the unincorporated area of the county, ~~and within the following residential land use designations: C, CL-M, CL-H, ER, MU, MFR-H, NHP, RMH, RR, RU, and SFR. SFR, ER, RR, MFR-L or RMH.~~

(Ord. No. 18-07, § 1(Att. A), 5-15-2018)

### 5.65.030 Definitions.

The definitions in the Mono County General Plan, including but not limited to, those contained in Chapter 2 of the [Land Use Element](#), shall apply to this Chapter, in addition to the following definitions:

1. "Application" means the form(s) provided by Mono County in accordance with this Chapter for the purpose of seeking a Short-Term Rental Activity Permit.
2. "Approval authority" means the Mono County Board of Supervisors or its authorized designee.
3. "Department" means the Mono County Community Development Department.
4. "Director" means the director of the Mono County Community Development Department or an authorized representative.
5. "Hearing officer" means a person appointed by the approving authority to conduct an administrative hearing under this Chapter. The appointed hearing officer shall be an impartial decision-maker selected by a process that eliminates risk of bias, such as:
  - a. An administrative law judge provided by the State of California Office of Administrative Hearings to function as the county hearing officer pursuant to Chapter 14 of Part 3 of Division 2 of Title 3 of the California Government Code;
  - b. A person selected randomly from a panel of attorneys willing to serve as a hearing officer;
  - c. An independent contractor assigned by an organization or entity which provides hearing officers; or
  - d. Such other person determined by the approving authority to be capable of serving as an impartial decision-maker.



- ~~6. "Host" means the property owner, a relative of the property owner, or an individual who is the long-term resident of record of the property or premises, identified by the property owner and verified through a long term lease or other written record, where a Short term rental is located or proposed to be located.~~
- ~~7. "Hosted rental" means a Short term rental that is located on the same property as, or directly adjacent to, the verified Host or primary residence of a Short term rental property owner.~~
- ~~8. 6. "Person" means an individual, firm, partnership, joint venture, association, corporation, limited liability company, estate, trust, business trust, receiver, syndicate, or any other group or combination acting as a unit and includes the plural as well as the singular number.~~
- ~~97. "Primary residence" means a place where an individual resides or lives, including staying and sleeping overnight, for more than one-half of the year and is claimed as such for property tax purposes.~~
- ~~810-7. "Property owner" or "owner" means the natural person or group of natural persons who is the owner of record of the property or premises where short-term rentals are located or proposed to be located or, in the case of an owner which is not a natural person or group of natural persons, the owner's representative (as defined in this Chapter), individual, group of individuals or entity who is the record owner of record of the property or premises where short-term rentals are located or are proposed to be located.~~
- ~~11.8. "Short term rental(s)" means any structured dwelling, or portion of a dwelling structure, which is occupied, or intended or designed for occupancy, on a short term basis for purposes of sleeping, lodging or similar reasons. "Short term" means occupancy by persons other than the owner, whether by agreement, concession, permit, right of access, license, contract, payment of rent or otherwise, for a period of thirty or fewer consecutive calendar days. See the Mono County General Plan Land Use Element, Chapter 2, Section 02.1035.~~

(Ord. No. 18-07, § 1(Att. A), 5-15-2018)

### 5.65.040 Permits required.

Short-term rentals shall not be allowed in the unincorporated area of Mono County without first securing all permits, licenses and other entitlements required by the Mono County General Plan, the Mono County Code (MCC) and any applicable area plans and specific plans.

- A. It is unlawful for any person to conduct, engage in, or allow to be conducted or engaged in, short-term rentals in ~~C, CL-M, CL-H, ER, MU, MFR-H, NHP, RMH, RR, RU, or SFR~~ any land use designations in the unincorporated portion of Mono County, unless the ~~C~~county has issued such person a ~~S~~short-Tterm ~~R~~rental (STR) a ~~A~~ctivity ~~P~~permit (STR Activity Permit) under this Chapter and the permit is in effect. The fact that an owner possesses other types of state or county licenses or permits shall not exempt the owner from obtaining an STR ~~A~~ctivity ~~P~~Permit under this Chapter, nor shall the terms and conditions of any other such permit or license modify the requirements of a permit granted under this Chapter.
- B. An STR ~~A~~ctivity ~~P~~Permit pursuant to this Chapter shall be required for all short-term rentals in ~~the following~~ any residential land use designations: ~~C, CL-M, CL-H, ER, MU, MFR-H, NHP, RMH, RR, RU, and SFR. Non-residential designations and MFR-H are regulated by their land use designation and the general plan land use element (including, but not limited to, Chapter 26).~~
- C. Except as stated in §5.65.040(D), ~~Only~~ the property owner is eligible to apply for, and be issued, an STR ~~A~~ctivity ~~P~~permit, ~~and the owner verified Host shall be directly responsible for the management of the unit the party held responsible for compliance.~~ Should noncompliance occur, enforcement action will be taken against the property owner(s).

- D. Only natural persons are eligible to apply for, and be issued, an STR Activity Permit. If the property owner is not a natural person, the natural person who applies on behalf of the property owner (the "owner's representative") must submit a notarized agreement which declares that the owner's representative may lawfully act on behalf of the property-owner entity. Along with the application for an STR Activity Permit, the owner's representative must submit entity formation documents (e.g., Operating Agreement for an LLC, Articles of Incorporation for a corporation) and documentation dated no more than one year prior to the application date confirming the property-owner entity is registered and in good standing with the California Secretary of State (see Section 5.65.070(D)(1)).
- DE. ~~Visitor rental permits~~ STR activity permits shall be limited to one per parcel and one per person regardless of whether the ownership interest is in whole or in part. In other words, an STR ~~a~~Activity ~~p~~Permit shall not be approved if a person with an ownership interest in the property, whether in whole or in part, has an existing ~~STR activity permit on another~~ vacation rental property within Mono County.
- EF. STR ~~A~~activity ~~P~~permits are prohibited ~~as follows in the community of June Lake: all Type II rentals, all rental types in the Williams Tract and Petersen Tract, and Type III Non-Hosted rentals in Clark Tract (excluding Nevada Street and Silver Meadow Lane) and South Highway 158. (See general plan maps in the land use element for definitions of the neighborhood areas.)~~ in certain neighborhoods in June Lake, and specific planning areas. See the Mono County General Plan Land Use Element Area Plan policies.
- FG. A use permit shall be required for all short-term rentals in ~~the following residential~~ all land use designations: ~~SFR, ER, RR, and RMH, C, CL-M, CL-H, MU, MFR-H, NHP, and RU~~ where they are permissible. The application for a use permit, and for amendments thereto and extensions thereof, shall be processed in accordance with Chapter ~~25-32~~ of the Mono County General Plan Land Use Element. The Planning Commission is the governing body authorized to consider and approve a use permit for short-term rentals and to consider extensions of and amendments to such use permits. Appeals from the decision of the Planning Commission are set forth in Chapter 47 of the Mono County General Plan Land Use Element.
- HG. Applications for an STR ~~a~~Activity ~~p~~Permit under this Chapter and a use permit or other land use entitlement for the same subject property may be submitted simultaneously, however no permit shall be issued under this Chapter unless and until the corresponding land use entitlement has been approved.
- IH. An STR ~~A~~activity ~~p~~Permit application may not be submitted for the following:
1. Properties owned by a person ~~n entity that has~~ had a Vacation Home Rental (VHR) permit, STR ~~A~~activity ~~p~~Permit, ~~overnight visitor~~ rental business license, or ~~STR overnight visitor rental use permit revoked due to non-compliance within the past two years.~~
  2. Properties for which the current owner or owners of record have held title to the property for ~~fewer~~ less than two years.
  3. Residences that are ~~fewer~~ less than two years past their construction date. For the purposes of this Section 5.65.040, construction date shall be the date the building official issues a certificate of occupancy for the residential building.
  4. ~~Properties~~ Units that are deed-restricted for affordable housing.
  5. ~~Projects~~ parties that received a density bonus, pursuant to State Density Bonus Law, unless specified in the Use Permit.
- JH. All short-term rental property owners must obtain a valid business license pursuant to MCC Chapter 5.04.
- KJ. All owners shall be responsible for obtaining a transient occupancy tax certificate and for complying with MCC Chapter 3.28 "Transient Occupancy Tax". An owner may contract with a management

company or property manager to collect, disburse, report, and maintain all records related to transient occupancy tax, but the owner remains responsible for any failure to collect, disburse, or accurately report such tax.

L.K.J. All owners shall conduct short-term rentals in compliance with all required County permits, licenses, and regulations. The owner shall be responsible for the payment of all required inspection fees, permit fees, and taxes.

(Ord. No. 18-07, § 1(Att. A), 5-15-2018)

### 5.65.050 Limitations on number of permits.

- A. The number of ~~Type I-Hosted~~ STR ~~a~~ Activity ~~p~~ Permits issued by the ~~C~~ county under this Chapter in the ~~upper~~ Clark Tract of June Lake (excluding Nevada Street and Silver Meadow Lane) shall not exceed eight parcels total (three percent of existing parcels in 2015). ~~, including existing transient rental overlay districts (TRODs).~~
- B. The number of visitor rental permits in the June Lake planning area shall not exceed 95 permits.
1. Short-Term Rental Activity Permit Renewal in June Lake. An application for renewal of a Short-term rental activity permit that is in good standing must be submitted prior to the expiration date of the STR activity permit in order to receive a renewal. If a property owner or agent fails to submit an application for renewal prior to the expiration (see Subsection 5.65.090), the STR activity permit STR Activity Permit application shall be considered an application for a new STR activity permit STR Activity Permit and, shall be subject to limitations on number of visitor rental permits.
  2. New Short-Term Rental Activity Permits. New STR activity permit STR Activity Permit applications received prior to reaching the overall limitation on the number of STR activity permit visitor rental permits will be processed in the order they are received. If or /when the overall limitation on the number of STR activity permit visitor rental permits is reached, all outstanding STR activity permit STR Activity Permit applications, either in process or received, will be placed on a waitlist as set forth below.
  3. Waitlist. The County will maintain a waitlist for STR activity permit STR Activity Permit applications in the order in which they were received. Fees will not be held by the County for waitlisted applicants. The County will continually maintain the overall cap inventory as activity permits visitor rental permits are not renewed or are revoked. STR activity permit STR Activity Permit applications must be complete, consistent with Section 5.65.100, except for the fee in order to be added to the waitlist, consistent with Section 5.65.100.-
  4. Waitlist Processing. Applications for STR activity permit STR Activity Permits from applicants on the waitlist will be processed as permits become available based on the cap inventory and date of receipt of the application, starting with the oldest date. A \_\_\_\_\_ n applicant will be notified by mail or, if the applicant consents to email notice, by email once they have been taken off the waitlist. An applicant must confirm they wish to proceed and pay fees in full within 30 days of the County notifying the applicant. If no response is received or fees are not paid within 30 days of the County notification to the applicant, the next waitlist applicant will be offered the opportunity. The non-responsive applicant may resubmit, which will be considered a new application subject to the procedures set forth herein.
- C.B. The Mono County Board of Supervisors, in its discretion, may at any time, determine by resolution, that the number of ~~STR activity permit~~ visitor rental permits should ~~stay the same,~~ be established, reduced, or ~~be~~ expanded in any area within the unincorporated portion of the county in order to protect neighborhood character, housing options, and reduce adverse impacts. In no case shall the number of ~~STR activity permit~~ visitor rental permits issued exceed the number of rentals authorized ~~by general plan policies and~~

~~regulations. STR activity permit~~STR Activity Permits shall be issued on a first-come, first-served basis within the established caps or limits.

- ~~DE.~~ This Section is only intended to create a maximum number of ~~STR activity permit~~visitor rental permits that may be issued within the county. Nothing in this Chapter creates a mandate that the ~~Ce~~county must issue any or all of the permits allowed under this Chapter if it is determined that it is in the best interest of the ~~Ce~~county to issue less than the maximum number, or if the owners or the property do not meet the standards which are established in the application requirements.

(Ord. No. 18-07, § 1(Att. A), 5-15-2018)

#### **5.65.060 ~~Limitations on short-term rental activity permit~~Short-Term Rental Activity Permits.**

- A. An ~~STR activity permit~~STR Activity Permit does not create any property interest in the property-~~owner~~, is not transferable, and automatically terminates upon the transfer or sale of the property to a new owner or, in the case of a property not owned by a natural person or group of natural persons, the transfer or sale of the property-owner entity, or a portion or share thereof, or upon revocation of any corresponding use permit.
- B. An ~~STR activity permit~~STR Activity Permit shall not be construed as providing a property right or conferring a vested interest or an entitlement to continue operation of a ~~S~~short-term rental.
- C. An ~~STR activity permit~~STR Activity Permit is a revocable license which requires annual renewal.
- D. An ~~STR activity permit~~STR Activity Permit shall not run with the land.

(Ord. No. 18-07, § 1(Att. A), 5-15-2018)

#### **5.65.070 Application process.**

- A. Prior to submitting an application, an applicant must obtain an inspection on the proposed rental unit to demonstrate that the unit complies with all requirements of this Chapter, including but not limited to Section 5.65.110, and the Mono County General Plan. The inspection must be conducted by a County-approved inspection officer, verified by a signed form provided by the County, and paid for by the a~~Applicant.~~
- B. Applications for an ~~STR activity permit~~STR Activity Permit may be obtained at the Mono County Community Development Department or online at the Mono County website. Completed applications shall be submitted to the department and applicants in June Lake ~~owners for short-term rentals in the upper Clark Tract~~ should request a date-stamped receipt.
- ~~CB.~~ Except as stated in §5.65.040(D), aAn applicant for an ~~STR activity permit~~STR Activity Permit must be the owner of record of the subject property.
- ~~DE.~~ In all cases, the application for an ~~STR activity permit~~STR Activity Permit shall contain, without limitation, the following information, attestations and confirmations:
1. The full name and contact information for all property owners. If the owner not a natural person or group of natural persons~~is a business entity or any form of legal entity~~, information regarding the entity, including but not limited to, entity formation documents (e.g., an Operating Agreement for an LLC or Articles of Incorporation for a corporation), a list of owners including ~~shareholders or the natural~~ person(s) with ownership interest in the property-owner entity, its legal status, and proof of registration with the Secretary of State, as applicable~~;~~.

2. Verification that the rental unit was acquired or constructed more than two years prior to the application date;
3. Verification that the rental unit is located on a property with the appropriate land use approvals or, if the approvals are being sought simultaneously, a statement so indicating;
- ~~4.3. A completed inspection form, in accordance with the requirement in Section 5.65.070(A), above. The rental unit complies with all requirements of this Chapter, including but not limited to Section 5.65.110, and the Mono County General Plan. Verification of compliance with such requirements shall be the responsibility of the owner. The owner shall certify in writing, under penalty of perjury, the rental unit's conformance to such standards;~~
- 5.4. Contact information for any management company or property manager responsible for the rental unit who will be available on a twenty-four-hour basis to address any problems that may be associated with the property. For Type I Hosted rentals, ~~the property owner may serve as the property manager, the resident identified as the Host, verified via submittal of applicable documentation, shall serve as the property manager.~~ For Non-owner-occupied Hosted rentals, a separate duly-licensed management company or property manager shall be required. A property manager or company that is duly licensed shall maintain a California real estate license and certified property manager credentials. The owner shall immediately notify the Community Development Department of any changes to management contact information;
- ~~6.5-~~ For Hosted rentals, the following:
  - A. If the owner is the Host:
    - i. A property tax statement, dated less than one year prior to the application submission date, which shows a homeowner's exemption credit for the subject property;
    - ii. A signed STR Activity Permit applicant's affidavit; and
    - iii. Two forms of proof of principal residency which may include any of the following:
      - driver's license or California state identification card;
      - pay-stub from current employer;
      - voter registration card;
      - motor vehicle registration;
      - homeowner's or vehicle insurance policy documents or bill; or
      - utility bill for water or electric/gas services, or bills for other services such as cable television, cell phone, and internet, provided that utility bills may be used as only one form of residency confirmation.
  - ~~Cable television, cell phone, and internet provider bills do not qualify as proof of residency.~~
  - B. If a long-term lessee is the host:
    - i. A signed, current, long-term lease agreement by and between the owner and the Host;
    - ii. A signed STR Activity Permit applicant's affidavit; and
    - iii. Two forms of proof of principal residency which may include any of the following:
      - driver's license or California state identification card;
      - pay-stub from current employer;
      - voter registration card;

- motor vehicle registration;
- renter's ~~or~~ vehicle insurance policy documents or bill; or
- utility bill for water or electric/gas services, , or bills for other services such as cable television, cell phone, and internet, provided that utility bills may be used as only one form of residency confirmation.

~~Cable television, cell phone, and internet provider bills do not qualify as proof of residency.~~

C. If an adult relative without a long-term lease is the Host:

- i. An affidavit signed by the owner describing the long-term tenancy;
- ii. A signed STR Activity Permit applicant's affidavit; and
- iii. Two forms of proof of principal residency which may include any of the following:
  - driver's license or California state identification card;
  - pay-stub from current employer;
  - voter registration card;
  - motor vehicle registration;
  - renter's ~~or~~ vehicle insurance policy documents or bill; or
  - utility bill for water or electric/gas services, , or bills for other services such as cable television, cell phone, and internet, provided that utility bills may be used as only one form of residency confirmation.

~~Cable television, cell phone and internet provider bills do not qualify as proof of residency.~~

~~Two forms of proof of principal residency which may include any of the following: a driver's license or California state identification card, pay-stub from current employer, Voter registration card, motor vehicle registration, insurance bill, tax documents showing the residential unit as the person's residence, or utility bill for water or electric/gas services, provided that utility bills may be used as only one form of residency confirmation. Cable television, cell phone or internet provider bills do not qualify as proof of residency; or~~

~~Long term lease agreement if the Host is not the property owner; and~~

~~Signed Hosted STR activity permit applicant's affidavit for either of the above.~~

- 7. The owner has obtained, or is in the process of obtaining, a Mono County business license;
- 8. The owner has obtained, or is in the process of obtaining, a Mono County transient occupancy tax certificate from the department of finance; and-
- 9. All required fees have been paid in full.

(Ord. No. 18-07, § 1(Att. A), 5-15-2018)

### **5.65.080 Review of applications and noticed public hearing.**

- A. All completed applications for an ~~STR activity permit~~ STR Activity Permit within permit caps stated in Section 5.65.050 shall be reviewed and processed for consideration ~~approval~~. This includes review by all departments having regulatory or enforcement authority over the proposed short-term rental. If the Director of the Mono County Community Development Department (Director) or any other department having regulatory or



enforcement authority, determines at any time during this review and processing period that additional information or materials are required, then he or she shall send notice to the ~~applicant~~ owner pursuant to Section 5.65.150 of the required/missing items or information and the property owner must provide the requested items or information before processing resumes. If any application is inactive for six months, it shall be deemed expired pursuant to Mono County General Plan Land Use Element §04.350.

- B. Upon completion of staff review, internal processing, and approval of the associated use permit, the ~~Director~~ shall set the matter for decision by the approval authority at a duly noticed public hearing during which the approval authority shall receive and consider the input and recommendations of staff, the owner and any interested persons. For purposes of this hearing, notice shall be given to any persons requesting such notice by mail or electronic mail and published in a newspaper of general circulation ten days in advance.
1. ~~If a property for which an STR activity permit has been issued under this chapter changes ownership, the new owner may apply for a new STR activity permit under the existing use permit approval. The new STR activity permit shall be evaluated and considered at the duly noticed public hearing described in this section.~~
- C. Following the noticed public hearing to consider the approval of an ~~STR activity permit~~ STR Activity Permit, the approval authority may issue the ~~STR activity permit~~ STR Activity Permit if all of the following findings can be made:
  1. The short-term rental, as proposed, will comply with the requirements of state law and regulation, the Mono County General Plan, the Mono County Code and this Chapter.
  2. The property has all necessary land use entitlements as required by the Mono County General Plan.
  3. The owner has demonstrated to the satisfaction of the approval authority the ability to comply with state law and regulation, the Mono County General Plan, the Mono County Code and this Chapter.
  4. The approval authority determines that issuance of the STR Activity Permit is in the best interests of the community, the county and the citizens of and visitors to Mono County based on the following factors:
    - a. Whether there are specific and articulable positive or negative impacts on the surrounding community or adjacent properties from the proposed short-term rental;
    - b. Whether the property owner has demonstrated to the satisfaction of the approval authority the ability and capacity to manage the short-term rental in a way that minimizes articulable negative impacts on the surrounding community or adjacent properties, and be responsive to community concerns and complaints; and
    - c. The potential for the short-term rental to impact other community needs and issues, such as the availability of workforce housing units.
- D. The approval authority shall deny an application that meets any of the following criteria:
  1. The owner has ~~knowingly~~ willingly or negligently made a false statement of material fact, or has knowingly omitted a material fact, from the application.
  2. A previous ~~STR activity permit~~ STR Activity Permit issued under this Chapter involving the same owner or any person having partial ownership as described in Subsection 5.65.070(~~DE~~)(1), has been revoked by the County within the two years preceding the date of the application and all opportunities for appeal of that determination have been exhausted or the time in which such appeals could have been filed has expired.
  3. The owner, including any person with partial ownership as described in Subsection 5.65.070(~~ED~~)(1), has been determined, by an administrative hearing body or a court of competent jurisdiction, to have engaged in short-term rentals in violation of state or local law within the two years preceding the date

of the application and all opportunities for appeal of that determination have been exhausted or the time in which such appeals could have been filed has expired.

4. The proposed rental unit was constructed less than two years prior to submittal of an ~~STR activity permit~~STR Activity Permit application. For the purposes of this Section 5.65.080, the construction date shall be determined to be the date a certificate of occupancy is issued.
  5. The owner, including any person with partial ownership as described in Subsection 5.65.070(~~DE~~)(1), is determined to have purchased or acquired the property less than two years prior to submittal of an ~~STR activity permit~~STR Activity Permit application.
  - ~~6.~~ A person with an ownership interest in the property, as described in Subsection 5.65.070(~~DE~~)(1), has an existing ~~STR activity permit~~visitor rental on another property within Mono County.
  7. The property has an outstanding violation or is the subject of a code enforcement case.
  8. The unit ~~property~~ is deed-restricted for affordable housing.
  9. The property was developed, or approved for development, with a density bonus, pursuant to State Density Bonus Law, unless specified in the Use Permit.
  10. A no-fault eviction has occurred in the proposed short-term rental unit within the last two years, as defined by State Law, including the 2019 Tenant Protection Act (AB 1482), as may be amended over time. No-fault evictions may include but not be limited to, owner move-in, intent to remodel or substantially remodel the unit, withdrawal of the unit from the rental market via the Ellis Act, or the owner complying with a government order or local law that requires the tenant to leave.
- E. If the approval authority denies the application, it shall specify the reasons for the denial on the record or by a subsequently issued written decision, which written decision shall be sent to the owner in accordance with Section 5.65.150 and applicable law.
- F. An ~~STR activity permit~~STR Activity Permit issued under this Chapter is an annual permit and shall expire on August 31st of each year (unless renewed or revoked in accordance with this Chapter). Permits granted within three months prior to the expiration date shall skip the first renewal cycle and instead shall expire on August 31st of the following year.

(Ord. No. 18-07, § 1(Att. A), 5-15-2018)

### 5.65.090 Renewal/modification process.

- A. An ~~STR activity permit~~STR Activity Permit may be renewed and/or modified in accordance with this Section.
- B. An application for renewal and/or modification shall be filed with the Mono County Community Development Department (Department), on the form(s) and in the manner prescribed by the Department, at least thirty calendar days before expiration of the permit, accompanied by the required renewal/modification fee. ~~If any of the documentation and information supplied by the property owner pursuant to Section 5.65.070 has changed since the grant of the permit, the owner shall submit updated information and documentation with the application for renewal and shall provide such other information as the Director of the Mono County Community Development Department may require.~~ For STR Activity Permits issued to an entity's owner's representative, an application for renewal and/or modification shall include the following:
  1. Current version of entity formation documents (e.g. Operating Agreement or Articles of Incorporation).
  2. Documentation dated no more than one year prior to the date of the application for renewal and/or modification confirming the property-owner entity is registered and in good standing with the California Secretary of State.



- C.** If the owner fails to submit the renewal application and all associated fees thirty days before August 31~~st~~, the ~~STR-activity-permit~~STR Activity Permit may not be timely renewed and operations shall be suspended unless/until the renewal is approved. For owners in June Lake, failure to timely renew their application will mean the forfeiture of an STR-activity-permitSTR Activity Permit and operations shall be halted ~~p~~STR Activity ~~P~~. Any subsequent application shall be considered a new permit application and will be subject to the waitlist in accordance with Section 5.65.050(B)(3).
- D.** If the renewal/modification application is incomplete, or if the ~~d~~Director determines that additional information is required, the ~~d~~Director will send notice to the owner in accordance with Section 5.65.150 listing the items or information to be provided. The owner shall have fifteen business days from the postmark or, if the applicant consents to email notice, email date of the notice to submit the listed items. If the owner fails to timely provide the items or information listed in a notice, then the renewal application will be denied as incomplete. For owners-properties located in June Lake, aAny subsequent application submitted after the permit expiration date shall be considered a new permit application, and for owners in June Lake these new permit applications will be subject to the waitlist per Section 5.65.050(B)(3).
- E.** Upon the timely filing of a renewal/modification application and timely provision of any missing or supplemental information under Subsection **D**, short-term rentals under the existing permit may continue until the ~~d~~Director has made a final determination on the application, unless the permit is otherwise revoked or suspended pursuant to this ~~e~~Chapter.
- F.** A permit shall be renewed/modified by the ~~d~~Director upon determination that the short-term rental meets the standards for grant of the application under ~~Sections 5.65.070 and 5.65.080~~this Chapter and none of the conditions for denial set forth below are present.
- G.** Grounds for denial:
1. The permittee or short-term rental fails to conform to the criteria set forth in this Chapter or the use permit;
  2. The permittee is delinquent in payment of applicable ~~C~~county taxes or fees or charges; or
  3. The permit is suspended or revoked or there is an enforcement proceeding pending at the time of the application.
  4. There has been a change in ownership or a change in the makeup of the ownership entity.
- H.** The ~~d~~Director shall specify in writing the reason(s) for any denial of the renewal/modification and shall send the written decision to the permittee in accordance with Section 5.65.150 with an explanation that the decision shall become final in ten calendar days of the postmark or, if the applicant consents to email notice, email date of the decision, unless the owner submits a completed appeal form to the department requesting a hearing. The appeal form may be obtained from the Mono County Community Development Department office. Failure to submit a written request for an appeal hearing within ten calendar days of postmark or, if the applicant consents to email notice, email date of the notice of denial of the renewal/modification shall constitute a waiver of the right to appeal and a failure to exhaust administrative remedies.
- I.** Upon timely receipt of a written request for an appeal hearing, the Director shall set the matter for hearing before the approval authority. The determination of the Director shall be stayed pending appeal, unless the violation poses an immediate threat to public health and safety, as determined by the Director and stated in the written denial.
- J.** If a renewal/modification application is denied, an owner may file a new application pursuant to this Chapter.

(Ord. No. 18-07, § 1(Att. A), 5-15-2018)

### 5.65.100 Fees.

The filing of an application for an ~~STR activity permit~~STR Activity Permit, for renewal of an ~~STR activity permit~~STR Activity Permit, or a written request for an appeal hearing shall be accompanied by payment of such fees as the Board of Supervisors may establish to recover the cost of administration of this Chapter. Notwithstanding anything to the contrary in this Section 5.65.100, the fee for an ~~STR activity permit~~STR Activity Permit subject to the waitlist shall be collected when an application is eligible to be removed from the waitlist for processing. Property owners are responsible for the costs of inspections, investigations, and any other fee-associated activity established pursuant to this Chapter.

(Ord. No. 18-07, § 1(Att. A), 5-15-2018)

### 5.65.110 Short-term rental-~~(STR)~~ standards and requirements.

Throughout the term of an ~~STR activity permit~~STR Activity Permit, each permittee shall comply with this Chapter and all other applicable County regulations, including but not limited to, the following:

#### A. Health and Safety Standards.

1. The address of the rental unit must be unobstructed at all times and clearly visible by a passersby;
2. Carbon monoxide and smoke detectors must be installed and maintained in good operating condition in each bedroom, sleeping area, or any room or space that could reasonably be used as a sleeping area, and at a point centrally located in the corridor or area giving access to each separate sleeping room;
3. All stairs, decks, guards, and handrails shall be stable and structurally sound;
4. The rental unit shall be equipped with a minimum of one 2A:10B:C type fire extinguisher with no more than seventy-five feet of travel distance to all portions of the structure; there shall be no fewer than one such extinguisher per floor. Fire extinguishers shall be mounted in visible locations with the tops of the fire extinguishers mounted between three and five feet above the floor and shall be accessible to occupants at all times. California State Fire Marshal annual certification tags must be provided and be current on all extinguishers;
5. If there is a fireplace or solid-fuel barbecue, the rental unit shall be equipped with a minimum five-gallon metal container with a tight-fitting lid for ash removal. This container shall be clearly labeled and constructed to meet the purpose of containing ash. Instructions on the proper disposal of ash shall be stated in the rental agreement and clearly posted in the rental unit. The ash container shall not be placed on or near any furniture or other combustible material; ashes must be wet down thoroughly with water; the ash can must be stored outdoors with a minimum of three feet clearance from building, porch, trees, and other combustible materials; the lid must remain on the ash container when in use;
6. Wall or baseboard heaters in the rental unit shall be in good working condition, and instructions on the proper use of these units shall be clearly stated in the rental agreement and posted in the rental unit;
7. Furniture and any other material that may be flammable shall be kept a minimum of fifty-four inches from any fireplace opening and thirty inches from any wall or floor heaters;
8. Flammable or hazardous liquid or materials, firearms, controlled substances, or any unlawful material shall not be stored in the rental unit or any attached structure;

9. The roof and grounds of the ~~transient~~ rental property shall be kept clear of accumulations of pine needles, weeds, and other combustible materials;
  10. Any locking mechanism on exterior doors must be operable from inside the unit without the use of a key or any special knowledge. If the dwelling unit is greater than three thousand square feet in area, two exit doors shall be required, each of which shall conform to this requirement;
  11. All fixtures, appliances, furnaces, water heaters, space heaters, plumbing, wiring, electrical, propane or gas connections, doors, windows, lighting, and all parts of the structure and furnishings (interior and exterior) must be in operable working condition and repair;
  12. Landline telephone service is required. A telephone shall be connected to the local carrier and in working condition for use in the event of an emergency or to contact the owner or property manager. The phone shall be connected to the reverse 911 directory. The rental agreement shall disclose limitations to cell phone coverage and service providers;
  13. Bedroom windows shall be operable and free of obstructions to allow for emergency escape and rescue;
  14. There shall be at least one screened window per bedroom to allow for proper ventilation;
  15. All utilities (electric, gas, water, sewage, etc.) shall be connected, in good operating condition, and connected to approved sources;
  16. Any hot tubs, pools, ~~and~~ ~~or~~ spas shall be fenced or equipped with a cover with locking mechanisms, and shall be maintained in a safe and sanitary condition;
  17. There shall be no evidence of pest infestations, and all firewood and other stored items shall be kept in a neat and clean condition;
  18. Exits shall be kept free from storage items, debris or any impediments at all times;
  19. No tree limbs are allowed within ten feet of any chimney or flue openings;
  20. Spark arresters of a minimum opening size of three-eighths-inch and a maximum opening size of one-half-inch shall be required on all fireplace flue openings; and
  21. If any applicable law, rule, or regulation imposes requirements more stringent than those set forth herein, such requirements shall apply.
- B. Sign, Notification and Advertising Requirements.
1. Exterior Sign and Notice. Each rental unit shall be equipped with one temporary exterior identification sign not to exceed eight and one-half inches by eleven inches in size that shall be posted as long as the unit is being rented on a ~~transient~~ ~~short-term~~ basis. This identification sign shall be placed in a location that is clearly visible from the front entrance of the unit, and may be illuminated in a manner that does not conflict with any County exterior lighting standards or signage standards. This sign shall clearly state the following information in lettering of sufficient size to be easily read:
    - a. The name of the managing agency, agent, property manager, ~~or~~ owner, ~~or~~ Host of the unit and the telephone number where said person or persons can be reached on a twenty-four-hour basis;
    - b. The maximum number of occupants permitted to stay in the unit; and
    - c. The maximum number of vehicles allowed to be parked on the property. A diagram fixing the designated parking location shall be included.

2. Interior Notice. Each rental unit shall have a clearly visible and legible notice posted within the unit adjacent to the front door that shall contain the same information set forth above, and shall additionally include the following:
  - a. Notification and instructions about the proper disposal of trash and refuse, including any bear-safe disposal requirements;
  - b. Notification and instructions concerning the proper use of any appliances, fireplaces, heaters, spas, or any other fixture or feature within the unit;
  - c. Notification that failure to conform to the parking, trash disposal and occupancy requirements for the rental unit shall be a violation of this ~~Chapter~~ Chapter and may result in immediate removal from the premises and administrative, civil or criminal penalty;
  - d. Notification that any violation of rules or regulations set forth in the rental agreement may be a violation of this Chapter and may result in immediate removal from the premises and administrative, civil or criminal penalty;
  - e. Physical street address of the unit and emergency contact information consisting of 911, the property manager's phone number, and contact information of the local fire department and the Mono County Sheriff's Department; and
  - f. An evacuation plan and a statement regarding respect for adjacent property owner's rights, neighborhood character, and trespassing concerns.
3. The ~~STR activity permit~~ STR Activity Permit number, which shall be assigned at the time the permit is issued, shall be posted in the title of every short-term rental advertisement, whether online or in other promotional or advertising materials.
4. Any form of advertising for an unpermitted short-term rental unit is prohibited.
- C. Occupancy. The maximum number of persons who may occupy the property as transient renters or their overnight guests shall be limited to two persons per bedroom plus two additional persons. In no event shall the maximum occupancy exceed ten persons in any rental unit unless the unit is certified and approved by the Mono County Building Official as meeting all applicable building standards for such occupancy. Additionally, occupancy may be further restricted by the limitation of the septic system serving the dwelling as determined by Mono County Environmental Health.
- D. Parking. Parking requirements shall be based on the parking requirements set forth in the Mono County General Plan, and the number of vehicles shall not exceed the number of parking spaces. Parking requirements for the rental unit shall be noticed in the rental agreement and posted on and in the unit. There shall be no off-site or on-street parking allowed, and parking on property owned by other persons shall be considered a trespass. A violation of this Section may subject any person to administrative, civil and criminal penalty, including fines and towing of any vehicle, as authorized by state and local law.
- E. Trash and Solid Waste Removal. A sufficient number of trash receptacles shall be available. Trash and other solid waste shall not be allowed to accumulate in or around the property and shall be removed promptly to a designated landfill, transfer station or other designated site. For purposes of this paragraph, promptly shall mean at least one time per week during any week that the unit is occupied, regardless of the number of days it is occupied. Any trash receptacles located outside a unit shall be in bear-proof containers (in areas with bears) and comply with county standards. Trash removal requirements for each rental unit shall be included in the rental agreement and posted on and in the property. Property management shall be responsible for the cleanup if the tenants do not properly dispose of trash in bear-proof containers.

- F. Snow Removal. The property owner or manager shall ensure that snow removal from driveways, walkways, stairs, decks, and all exits and entrances shall be performed prior to each occupancy period, and during any occupancy period as needed to maintain the functionality of these areas. Snow removal from driveways, pathways, exits and entrances, and removal of snow, ice, and ice dams from roofs, decks, and stairs shall be performed in a timely manner as necessary to protect any person who may be using or visiting the rental unit.
- G. Other Requirements. In addition to the foregoing, the following requirements shall be met:
1. Except for short-term rentals operating north of Mountain Gate, exterior lighting fixtures shall comply with Chapter 23, Dark Sky Regulations, which shall require existing fixtures to be replaced or retrofitted, if necessary, to comply;
  2. Owner or property manager must be able to respond within a reasonable timeframe, preferably within an hour;
  3. Quiet hours from ten p.m. to seven a.m., and outdoor amplified sound is prohibited at all times;
  4. If applicable, the owner shall notify lender of change in use to short-term rental and provide verification to [the County](#) upon request; and
  5. A "hideaway" key or other access shall be available at all times in the event a guest is locked out. All guests shall be made aware of any such key or alternative access.

(Ord. No. 18-07, § 1(Att. A), 5-15-2018)

#### **5.65.120 Rental agreement and owner responsibility.**

- A. Rental Agreement. The temporary rental or use of each rental unit shall be made pursuant to a rental agreement. The rental agreement shall include, as attachments, a copy of this Chapter and the ~~STR activity permit~~[STR Activity Permit](#) for the unit. Each rental agreement shall contain all required notices and shall specify the number of persons who may occupy the unit, parking requirements and number of allowed vehicles, trash disposal requirements, and include the telephone number of the person or persons to be notified in the event of any problem that arises with the rental. The agreement shall include the phone number, address, and contact information for ~~management person/entity~~[the property manager](#), and any other information required by the [County](#). The rental agreement shall notify the renters that they may be financially responsible and personally liable for any damage or loss that occurs as a result of their use of the unit, including the use by any guest or invitee. The owner, managing agency and/or property manager shall keep a list of the names and contact information of the adult guests staying in the unit.
1. Within the Clark Tract in June Lake, to ensure prepared visitors, the following must be disclosed in advertisements and the rental agreement: A description of rough road conditions; and the potential need for chains in winter conditions. Contact information for the [property manager/owner and Host](#) ~~if road assistance is needed~~ shall be included in the rental agreement [in case road assistance is needed](#).
- B. Owner Responsibility.
1. The owner shall be responsible for compliance with all applicable codes regarding fire, building and safety, health and safety, other relevant laws, and the provisions of this Chapter.
  2. An owner, managing agency, and/or property manager shall be personally available by telephone on a twenty-four-hour basis to respond to calls regarding the conditions and/or operation of the unit. Failure to timely respond in an appropriate manner may result in revocation of the ~~STR activity permit~~[STR Activity Permit](#) and business license.

3. The owner shall require, as a term of a written agreement with a management company or agent, that said agent comply with this Chapter. The owner shall identify the management company or agent, including all contact and license information in the application for an ~~STR activity permit~~ STR Activity Permit, and shall keep this information current. Such agreement shall not relieve owner of the obligation to comply with this Chapter.
4. The owner shall maintain property insurance coverage specific to short-term rentals that covers, but is not limited to, fire and liability, including injury and damage to ~~h~~Hosts, guests, and others, in an appropriate amount and shall provide proof of such insurance to ~~the c~~County upon reasonable request. Additionally, the owner shall defend, indemnify, and hold the ~~C~~ounty harmless from any and all claims, judgments, liabilities, or other costs associated with the property or the rental unit, or the rental thereof.
5. The owner, managing agency, property manager and guest(s) shall comply with all lawful direction from any law enforcement officer, fire official, building official, or code compliance officer.
6. The owner shall be responsible for assuring that the occupants and/or guests of the rental property do not create unreasonable noise or disturbances, engage in disorderly conduct, or violate any law. If an owner, Host, managing agency and/or property manager, or other agent of the owner is informed about any violation of this Chapter, the owner, Host, managing agency and/or property manager, or owner's agent shall promptly take action and use best efforts to stop or prevent a recurrence of such conduct, including, when appropriate, calling law enforcement.

C. Host Responsibility.

1. The Host must be physically and personally present at the time of the short-term rental, including by meeting guests upon arrival. Such physical presence must include sleeping overnight. A Host will not be considered to live at the property used for a short-term rental if they are away from the property overnight during a rental, including on vacation.
2. The Host must be a long-term, primary, and verified full-time resident on the property of a Hosted rental.
3. The Host shall be available to ~~STR~~ short-term renters during the rental period.
4. ~~The Host, managing agency, and/or property manager~~ shall be personally available by telephone on a twenty-four-hour basis to respond to calls regarding the conditions and/or operation of the unit. Failure to respond in a timely, appropriate manner may result in revocation of the ~~STR activity permit~~ STR Activity Permit and business license.
5. ~~The Host, managing agency, property manager~~ and guest(s) shall comply with all lawful direction from any law enforcement officer, fire official, building official, or code compliance officer.
6. The Host shall be responsible for assuring that the occupants and/or guests of the rental property do not create unreasonable noise or disturbances, engage in disorderly conduct, or violate any law. If an owner, managing agency and/or property manager, or other agent of the owner ~~Host~~ is informed about any violation of this Chapter, the ~~owner, managing agency and/or property manager, or owner's agent~~ Host shall promptly take action and use best efforts to stop or prevent a recurrence of such conduct, including, when appropriate, calling law enforcement.

(Ord. No. 18-07, § 1(Att. A), 5-15-2018)

### 5.65.130 Suspension or revocation of ~~short-term rental activity permit~~Short-Term Rental Activity Permit.

Any of the following shall be grounds for suspension or revocation of an ~~STR activity permit~~STR Activity Permit, following the procedures in Section 5.65.140 of this Chapter.

- A. Failure to comply with one or more of the terms and conditions of the ~~STR activity permit~~STR Activity Permit, this Chapter, the Mono County General Plan or any other applicable law or regulation.
- B. The ~~STR activity permit~~STR Activity Permit was granted on the basis of false material information, written or oral, given willfully or negligently by the owner.
- C. Any revocation of the conditional use permit issued under the Mono County General Plan.
- D. Failure to pay applicable state or county taxes or fees related to the short-term rental.
- E. Conduct of the short-term rental in a manner that constitutes a nuisance, where the permittee has failed to comply with reasonable conditions to abate the nuisance as directed by the ~~county~~County.

(Ord. No. 18-07, § 1(Att. A), 5-15-2018)

### 5.65.140 Procedure for suspension or revocation.

- A. If the Director determines that grounds for suspension or revocation of the ~~STR activity permit~~STR Activity Permit exist, he or she shall issue a written notice of intention to suspend or revoke the permit, as applicable. The notice of intention shall be served in accordance with Section 5.65.150 on the property owner, as reported on the permit. The notice of intention shall describe the property, the intention to revoke or suspend the permit, the grounds for suspension or revocation, the action necessary to correct or abate the violation and a reasonable time limit for compliance.
- B. If the violation has not been corrected within the period specified in the notice of intention, the ~~d~~Director may issue a notice of suspension or revocation, as applicable. The notice of suspension or revocation shall be served in the same manner and upon the same persons as described above for service of the notice of intention and shall be effective ten calendar days from the date it is postmarked or, if the owner has consented in the permit application to email notice, emailed, unless a request for hearing is submitted as described in Subsection C.
- C. The owner shall have ten calendar days from postmark or, if the applicant consents to email notice, email date of the notice of revocation or suspension to submit a completed appeal form to the ~~D~~Department requesting a hearing. The appeal form may be obtained from the Mono County Community Development Department office or online. Failure to submit the requisite form within ten calendar days of postmark or email date, if consent to email notice was given in the application, of the notice of revocation or suspension, shall be deemed a waiver of the right to challenge the suspension or revocation and a failure to exhaust administrative remedies.
- D. Upon receipt of a timely written request for a hearing, the ~~d~~Director shall set a date for a hearing to be held as soon as reasonably practicable before the approval authority or a hearing officer designated by the board ("hearing body"). Notice of the hearing, including the time, date, and location of the hearing, shall be served in the same manner and upon the same persons as described above for service of the notice of intention. The revocation or suspension shall be stayed until the hearing body decision is final.
- E. Hearing Procedures.



1. The hearing body is authorized to conduct hearings, issue subpoenas, receive evidence, administer oaths, rule on questions of law and the admissibility of evidence, prepare a record of the proceedings, and render decisions on the suspension or revocation of the ~~STR activity permit~~ [STR Activity Permit](#).
2. In any proceeding before a hearing body, oral testimony offered as evidence shall be taken only on oath or affirmation, and the hearing officer, his/her clerk, or other designee shall have the power to administer oaths and affirmations and to certify to official acts.
3. All parties to the hearing shall have the opportunity to testify, introduce exhibits, call and examine witnesses, and cross examine opposing witnesses on any matter relevant to the issues.
4. The hearing body may postpone the hearing date upon good cause shown, continue the hearing during the course of the hearing, and make such other procedural orders and rulings as he or she deems appropriate during the course of the hearing.
5. The hearing shall follow the procedures set forth in Subsections 1.12.050(E)—(L) of the Mono County Code, except that the notice of intention issued under this Chapter shall be treated as the notice of violation under those Subsections and the notice of suspension or revocation issued under this Chapter shall be treated as the administrative citation.
6. Within thirty calendar days after the close of the hearing, the hearing body shall issue a written decision, including a statement of the basis for the decision. The hearing body's written decision shall constitute the final administrative decision of the [County](#).
7. If neither the owner, nor their authorized representatives, appear at the noticed hearing, such failure to appear shall constitute an abandonment of the hearing request and a failure to exhaust administrative remedies.

(Ord. No. 18-07, § 1(Att. A), 5-15-2018)

#### **5.65.150 Service requirements.**

Wherever this Chapter requires the [County](#) to serve notice on a property owner, such notice shall be given in writing, and shall be delivered either by personal delivery, electronic mail (email) if the applicant consents to receipt of email notice in the application, or by ~~certified~~ U.S. mail [with a filed affidavit](#). In addition, any such notice may be posted at the physical address of the premises on the date of personal delivery, mailing, or emailing of notice. Service shall be deemed complete upon mailing or emailing.

(Ord. No. 18-07, § 1(Att. A), 5-15-2018)

#### **5.65.160 Enforcement.**

The remedies provided by this Chapter are cumulative and in addition to any other remedies available at law or in equity.

- A. Any violation of a short-term rental ordinance of the [County](#), including but not limited to, this Chapter and Chapters 25 and 26 of the Mono County General Plan, may be enforced through administrative citation and fines as provided in MCC Chapter 1.12, except that the amount of the administrative fines shall be one thousand five hundred dollars for a first violation, three thousand dollars for a second violation within one year of the first violation and five thousand dollars for each additional violation within one year of the first violation. The fines set forth in this Section shall not apply to a first-time offense of failure to register or pay the business license fee, which shall instead be subject to the fines set forth in MCC Section 1.12.030.



- B. Any condition caused or allowed to exist in violation of any of the provisions of this Chapter, the Mono County General Plan, use permit, or applicable state law or regulation is a public nuisance which shall, at the discretion of the [County](#), be subject to abatement or other relief pursuant to Chapter 7.20 of the Mono County Code.
- C. Each and every violation of this Chapter, the Mono County General Plan, or applicable state law or regulation shall constitute a separate violation per day and shall be subject to all remedies and enforcement measures authorized by the Mono County Code or otherwise authorized by law. Additionally, any violation shall be subject to injunctive relief, disgorgement to the [County](#) of any and all monies unlawfully obtained, costs of abatement, costs of restoration, costs of investigation, restitution, and any other relief or remedy available at law or in equity. The [County](#), including the office of the district attorney and the office of the county counsel, may pursue any and all remedies and actions available and applicable under state and local laws for any violations.
- D. Hardship Waiver for Administrative Fines Under Section 5.65.160(A). Any party fined under Section 5.65.160(A) may be granted a hardship waiver reducing the amount of the administrative fines if:
  1. The party has made a bona fide effort to comply after the first violation; and
  2. Payment of the full amount of the administrative fines would impose an undue financial burden on the party.

A hardship waiver request shall be filed on a hardship waiver application form made available upon request by the office of code compliance and filed within ten business days after service of the administrative citation levying the fines. The completed application shall be filed with the code compliance office together with a sworn affidavit, and any other supporting documents or materials, demonstrating why the requirements of Section 5.65.160(D)(1) and (D)(2) are satisfied. If the request and supporting materials demonstrate to the satisfaction of the code compliance officer or his or her designee that the requirements of Section 5.65.160(D)(1) and (D)(2) are satisfied, the fine shall be reduced to the amounts set forth in MCC Section 1.12.030 or such other amount as the code compliance officer or his or her designee deems appropriate. Any hardship waiver request not timely submitted shall be rejected, and the applicant shall be deemed to have waived his or her right to request a hardship waiver. The time for appeal of an administrative citation pursuant to MCC Section 1.12 shall not be extended due to any fine reduction request pursuant to this paragraph.

(Ord. No. 18-07, § 1(Att. A), 5-15-2018; Ord. No. 22-008, § 1(Exh. A), 7-19-2022)

### **5.65.170 Existing and otherwise permitted rentals.**

Any lawful use of property as a short-term rental [permitted under a prior regulatory framework that was not subject to this Chapter remains exempt from this Chapter as long as all conditions and requirements of the previous approval are met](#), ~~or subsequently authorized, in a non-residential land use designation, or MFR-H, that permits such uses (or permits such uses subject to use permit or director review approval) shall be exempt from the provisions of this chapter.~~

(Ord. No. 18-07, § 1(Att. A), 5-15-2018)

### **5.65.180 Severability.**

If any section, subsection, sentence, clause or phrase of this Chapter is for any reason held to be invalid, such decision shall not affect the validity of the remaining portions of this Chapter. The Board of Supervisors hereby declares that it would have passed this Chapter and each section, subsection, sentence, clause, and phrase thereof, irrespective of the fact that any one or more sections are held invalid.

(Ord. No. 18-07, § 1(Att. A), 5-15-2018)

DRAFT

## Attachment 3

## MONO COUNTY Community Development

P.O. Box 347  
Mammoth Lakes, CA 93546  
760-924-1800, Fax 924-1801  
[commdev@mono.ca.gov](mailto:commdev@mono.ca.gov)

P.O. Box 8  
Bridgeport, CA 93517  
760-932-5420, Fax 932.5431  
[www.monocounty.ca.gov](http://www.monocounty.ca.gov)

August 5, 2025

To: The Mammoth Times  
From: Olya Egorov, Planning Analyst  
Re: Legal Notice for **August 9** edition  
Invoice: Heidi Willson, P.O. Box 347, Mammoth Lakes, CA 93546

### NOTICE OF PUBLIC HEARING

**NOTICE IS HEREBY GIVEN** that the Mono County Planning Commission will conduct a public hearing on **August 21, 2025**, in the Mono Lake Room (1<sup>st</sup> floor) at the Mono County Civic Center, 1290 Tavern Road, Mammoth Lakes, and the meeting will be accessible remotely by Zoom at <https://monocounty.zoom.us/j/88919929655> or in-person in the CAO Conference Room at the Mono County Offices, Annex 1, 74 N. School Street, Bridgeport, where members of the public shall have the right to observe, consider and offer public comment on **General Plan Amendment (GPA) 25-01 and modifications to Mono County Code (MCC) Chapter 5.65** (collectively, “the Project”) no earlier than **9:00 AM**. The Project includes the following short-term rental policy update, among others: consolidates the permitting process, revises owner-occupancy criteria, requires third-party inspections, establishes a numeric cap and waitlist in June Lake, implements a waiting period before any property owner can apply for a permit, and prohibits the transfer of permits. The Mono County Planning Commission will receive public input and make a recommendation to the Mono County Board of Supervisors on whether to adopt the project and any further modifications. The clean and redline versions of the General Plan Amendment are available for public review at <https://monocounty.ca.gov/community-development/page/short-termtransient-rentals> and hard copies are available for the cost of reproduction. Materials for the public hearing will be released no later than Friday, August 15. **INTERESTED PERSONS** are strongly encouraged to submit comments to the Secretary of the Planning Commission **no later than Wednesday, August 20, 2025, at 5:00 PM**, after which comments and testimony should be submitted in-person at the public hearing to guarantee receipt by the Commission. Public comments may be submitted by email to [cddcomments@mono.ca.gov](mailto:cddcomments@mono.ca.gov), in-person to 1290 Tavern Road, Suite 138, Mammoth Lakes, or by mail to P.O. Box 347, Mammoth Lakes, CA 93546. If you challenge the proposed action(s) in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice, or in written correspondence delivered to the Secretary to the Planning Commission at, or prior to, the public hearing.

## Mono County Planning Division\*: Current Projects

**August 14, 2025**

\*Does not comprehensively include transportation, LAFCO, building, code compliance, etc. projects

Completed Planning Work		
GPA/SP	Mono Basin	STRs & campground, awaiting applicant approval of CEQA costs - expired
UP	June Lake	new STR - expired
UP	June Lake	4 new units - expired
UP	Sonora Junction	Recreational facilities - withdrawn, following up on compliance
UP	Walker	Compliance Agreement for approved but noncompliant UP
Administration	Year end closeout, recruiting for open positions, job descriptions, project billing, etc.	
Regular Workflow	Meetings (LDTAC, LV HAC, CPT, 3 RPACs, LTC), inquiries, plan checks	
Active Planning Permit Applications		
Permit Type	Community	Description
GPA/SP	Mono Basin	Convert D&S Waste UP into a SP to limit permitted uses to those approved in the UP
DR	Sonora Junction	Permit existing nonconforming personal campground, uses limited to proven historic uses
UP	SBP	wood pellet manufacturing
UP	June Lake	New RV Park (Bear Paw)
UP	Sunny Slopes	New Long Valley Fire Dept station
UP	June Lake	Transient Rental
UP	June Lake	four workforce housing units
UP	June Lake	STR
UP	June Lake	4 visitor lodging cabins, contracted with consultant to process
LM	June Lake	Highlands II
LM	Walker	merger of ER parcels
LM	Virginia Lakes	merger of two parcels
Active Policy/Planning Projects		
Name	Community	Description
Short-Term Rental Housing Study	Countywide	Packaged for PC consideration on 8/21/25
RHNA Calculations	Countywide	Discussed with HCD
STIP/RTIP	Countywide	Received STIP estimate, drafting RTIP for adoption by LTC
Overall Work Program Draft	Countywide	Implementing, tracking budget
Multi-Jursidictional Hazard Mitigation Plan Update	Countywide	Input from agencies/districts being finalized, internal review of draft plan and annex documents
Review last mile provider proposal	Countywide	Attending meetings, providing feedback
Drought Management Plan	Countywide	In progress
Workshop on Hemp regulations	Countywide	In progress
Annual Clean-up GPA	Countywide	In progress
RVs as residences	Countywide	Analyzing results for workshop with Planning Commission and Board to determine policy direction, requesting budget for consultant
Tri-Valley Groundwater Model	Tri-Valley	project underway by consultant
Revising Environmental Handbook	Countywide	Provide updated guidance to applicants on the County's implementation of CEQA
Safe Park Facility	Mammoth Vicinity	"Low Barrier Navigation Facility" at old Sheriff Substation, CDD compiled comments from all County departments, correction letter sent 4/18/25
Rush Creek Dam Decommissioning	June Lake	Continuing to follow and comment as needed
Transportation projects of note	Countywide	Lee Vining workshop on 8/13/25 - design complete, Walker Safety Project underway, following Bridgeport Main St

Active Policy/Planning Projects		
Environmental Justice Element	Countywide	Required by state law, drafting for public review, notified tribes of opportunity for input
HMO Update	Countywide	Prepared budget request for FY 25-26
US 395 Wildlife Crossings	Long Valley	
Sage grouse conservation	countywide	
Biomass Facility	Countywide	
Review State Minimum Fire Safe Standards and update General Plan regulations	Countywide	Will be a separate GPA, received determination that new regulations do not apply to existing roads
Revision to Chapter 11	Countywide; Antelope Valley	on hold pending staffing resources
Cannabis Odor Standards	Countywide	Low priority

**Acronyms:**

AG	Agriculture
APR	Annual Progress Report
BOS	Board of Supervisors
CDBG	California Development Block Grant
CEQA	California Environmental Quality Act
DR	Director Review
ESCOG	Eastern Sierra Council of Governments
GHG	Greenhouse Gas
GPA	General Plan Amendment
HCD	Housing and Community Development (State Department of)
LDTAC	Land Development Technical Advisory Committee
LLA	Lot Line Adjustment
LTC	Local Transportation Commission
LUD	Land Use Designation
LV HAC	Long Valley Hydrologic Committee
MFR-M	Multi-Family Residential - Medium
MLTPA	Mammoth Lakes Trails and Public Access
MMSA	Mammoth Mountain Ski Area
MU	Mixed Use
PC	Planning Commission
RHNA	Regional Housing Needs Allocation
RR	Rural Residential
RTIP	Regional Transportation Improvement Program
SP	Specific Plan
STIP	State Transportation Improvement Program
STR	Short-Term Rental
TOML	Town of Mammoth Lakes
UP	Use Permit
VHR	Vacation Home Rental
VMT	Vehicle Miles Traveled