

Mono County Response to Comments #1

Olya Egorov

From: Sonja Bush <sonja@destinationmammoth.com>
Sent: Monday, August 18, 2025 4:35 PM
To: CDD Comments; Comm Dev
Subject: Opposition to Proposed Changes in General Plan Amendment 25-01 and Mono County Code 5.65

You don't often get email from sonja@destinationmammoth.com. [Learn why this is important](#)

[EXTERNAL EMAIL]

Dear Members of the Mono County Planning Commission,

I am writing today not only as a real estate broker, but as a citizen deeply committed to the welfare of Mono County and its residents. Our community is at a pivotal juncture, and I urge you to carefully consider the unintended consequences of the proposed changes to short-term rental rules under General Plan Amendment 25-01 and Mono County Code 5.65.

While I understand the concerns behind these proposals, they will have a significant negative impact on homeowners and the broader economy of Mono County.

The Real Impact on Our Community

The majority of property owners I work with are not large-scale investors. They are families who purchase in Mono County because they love the area and want to spend time here, creating lasting memories. Some rent nightly to offset costs such as HOA fees, insurance, and utilities. Contrary to common assumptions, most are not making large profits—nightly rental income simply helps them manage the high cost of ownership. Before making sweeping changes, it would be wise to survey property owners across the county to understand how they truly use and depend on their rentals.

The proposed policies do not assume STR owners are large-scale investors. The policies affect any situation where income generated by the unit directly supports the ability to purchase/maintain it. The idea is that if a potential owner cannot generate revenue from the unit, the price point will reflect the true value of the unit, and the housing market will adjust accordingly. Theoretically, sales prices may be lower and therefore make housing more accessible for purchase or rent by local residents.

Regardless of whether STRs bring in significant profits, the bottom line is that they are contributing to higher property sales prices than could otherwise be afforded by

residents. According to the 2024 STR Study, the average daily rate (ADR) for an STR is \$105-138 in Coleville, Walker, and Benton. In June Lake, the ADR is \$414 per night, and Lee Vining sits in the middle at \$252 per night. The occupancy rates range from as little as 39 percent in the Coleville-Walker area to a high of 91 percent in Benton. With the majority of listings, June Lake has an average occupancy rate of 60 percent.

A countywide survey was conducted in 2024, and the general responses were supportive of the policy changes. In addition, local residents are also trying to create lasting memories in addition to a life here in Mono County.

Effectiveness of the Proposal

Restricting or eliminating nightly rentals will not meaningfully solve the workforce housing issue. Owners of condos or single-family homes who use their properties as second homes are unlikely to convert them to long-term rentals. I know this firsthand—I started as a second homeowner myself, and our family visited regularly. We would not have rented our property long-term, and many others feel the same.

The STR policies are not intended to solve workforce housing issues by themselves, nor are they intended to create or generate community housing units. They are a piece of an overall effort to make housing more accessible to local residents, in this case by limiting the loss of units to commercial lodging uses and resetting the housing market at prices that can be afforded without income generation from the unit. The County has separately adopted a housing strategy.

Further, the analysis acknowledges that the majority of STR owners (60% according to the survey) are not interested in any incentives and would leave the unit vacant if they could not use it as a short-term rental. However, the policies do not revoke any existing permits and so, current STR owners are not required to use their unit as a long-term rental, nor will any visitation be lost. In fact, the policies, including the numeric cap, allow for some growth in the STR market, and provide future buyers with advance notice of the changes.

Legal and Financial Consequences

Many property owners purchased with the clear understanding that nightly rentals were permitted, relying on disclosures, county records, and the Mono County parcel viewer. To suddenly strip away this right not only risks lawsuits but also erodes public trust in county leadership. Some owners have invested heavily in renovations with the intention of renting nightly. These proposed changes could expose the county to costly legal battles and undermine confidence in Mono County as a place to invest.

The ability to rent on a short-term basis will not be revoked for existing STRs. The proposed amendments only apply to new requests for short-term rentals. If homeowners invested money in remodels with the intention of short-term renting prior to receiving approvals, then they

undertook a personal risk with no guarantee. Further, even if permits were being revoked, the County has the jurisdictional authority to modify land use regulations based on proper findings in order to protect communities, public health, and safety.

Economic Impact

The ripple effect on the local economy cannot be ignored. Short-term rentals generate significant **Transient Occupancy Tax (TOT)** revenue, which directly funds essential county services. In addition, the nightly rental industry supports a wide network of local workers—housekeepers, property managers, electricians, plumbers, inspectors, and handymen. Restricting this activity risks job loss, reduced revenue, and long-term economic harm to our communities.

Again, no STR permits are being revoked, and, in fact, some growth is proposed. Therefore, current TOT revenue, visitation, and the need for local workers will remain intact and will grow slightly. In addition, the policies will help make units more accessible and available to those same local workers who support the STR industry – the housekeepers, property, managers, electricians, plumbers, inspectors, and handymen. The 2024 STR Study identified that every new STR generates a need for 0.8 units of new workforce housing, which these policies do not come close to providing.

Exploring Better Solutions

Instead of restricting homeowners, let's focus on real solutions:

- **Encouraging voluntary participation:** Many properties sit vacant most of the year. Outreach programs could encourage owners to consider long-term rentals, with support from Mono County Housing or similar organizations to handle screening, leases, and management.

An incentive program will be explored through a separate implementation process under Policy 1.D.9. of the MCGP LUE.

- **Supporting ADUs:** Provide financial incentives, tax breaks, and streamlined permitting to encourage single-family homeowners to build **Accessory Dwelling Units (ADUs)**.

The County already provides prescriptive designs, along with permit streamlining and regulatory relief under state law, for Accessory Dwelling Units. Additional incentives will be explored through a separate implementation process under Policy 1.D.9. of the MCGP LUE.

- **Regional housing projects:** Explore housing development in nearby communities like Crowley Lake, Chalfant, or Bishop, where more land is available.

Mono County is uniquely constrained by its remoteness, topography, and

limited land, 94% of which is publicly owned. Similarly, 98% of Inyo County public land. Mono County currently participates in ongoing regional housing efforts and projects, including those in all communities in Mono County and neighboring jurisdictions. However, the displacement of local residents is inconsistent with the goals of several planning areas that seek to ultimately develop into a moderately sized, self-contained, year-round community, and pushing local housing needs into neighboring jurisdictions has proven to be an ineffective solution to housing.

In Conclusion

These proposed changes will not address the underlying housing challenges but will instead create new hardships—legal disputes, economic fallout, and strained community relations. I respectfully urge the Planning Commission to reject these proposals and instead work collaboratively toward solutions that expand workforce housing without stripping away existing rights or destabilizing Mono County's economy.

Thank you for your time and thoughtful consideration. I welcome the opportunity for further discussion on this matter.

Sincerely, Sonja Bush Broker | Owner
Destination Real Estate

Mono County Response to Comments #2

Olya Egorov

From: Nicole Godoy <nicole@destinationmammoth.com>
Sent: Monday, August 18, 2025 5:02 PM
To: CDD Comments; Comm Dev
Subject: Opposition to Proposed Changes in General Plan Amendment 25-01 and Mono County Code 5.65

You don't often get email from nicole@destinationmammoth.com. [Learn why this is important](#)

[EXTERNAL EMAIL]

Dear Members of the Mono County Planning Commission,

I'm writing to you not just as a local real estate agent, but as someone who truly cares about the people and future of Mono County. I've been here for over 25 years and our community is at an important crossroad, and I ask you to carefully think about how the new rules for short-term rentals (in General Plan Amendment 25-01 and Mono County Code 5.65) might hurt local homeowners and the economy. We Realtors are the 1st ones on the front-lines when we meet and educate these homeowners, so I'd like to say - we're pretty well connected with these neighbors.

Most of the people I work with are not large corporations or investors. They are families (most likely from here in CA) who buy homes in Mono County because they love this place and want to visit it often. Some of them rent out their homes for short stays to help pay for things like HOA fees, insurance, and utilities. They aren't making a lot of money—just enough to keep their homes. Before making these big changes, it would be smart to ask more homeowners how they use their properties and how these changes might affect them. They are also stakeholders in the community as their property taxes pay for many of the services full-time locals get to have.

The proposed policies do not assume STR owners are large-scale investors. The policies affect any situation where income generated by the unit directly supports the ability to purchase/maintain it. The idea is that if a potential owner cannot generate revenue from the unit, the price point will reflect the true value of the unit, and the housing market will adjust accordingly. Theoretically, sales prices may be lower and therefore make housing more accessible for purchase or rent by local residents.

Regardless of whether STRs bring in significant profits, the bottom line is that they are contributing to higher property sales prices than could otherwise be afforded by residents. According to the 2024 STR Study, the average daily rate (ADR) for an STR is \$105-138 in Coleville, Walker, and Benton. In June Lake, the ADR is \$414 per night, and Lee Vining sits in the middle at \$252 per night. The occupancy rates range from as little as 39 percent in the Coleville-Walker area to a high of 91 percent in Benton. With the majority of listings, June Lake has an average occupancy rate of 60 percent.

A countywide survey was conducted in 2024, and the general responses were supportive of the policy changes. In addition, local residents also love this place and live in Mono County for that reason.

Stopping short-term rentals won't solve the problem of not having enough housing for local workers. Most second homeowners won't turn their homes into long-term rentals. Many of them still want to use the homes for themselves and their friends and family.

The new policies and regulations are not intended to solve workforce housing issues by themselves, nor are they intended to create or generate community housing units. They are a piece of an overall effort to make housing more accessible to local residents, in this case by limiting the loss of units to commercial lodging uses and resetting the housing market at prices that can be afforded without income generation from the unit. The County has separately adopted a housing strategy.

The analysis acknowledges that the majority of STR owners (60% according to the survey) are not interested in any incentives and would leave the unit vacant if they could not use it as a short-term rental. However, the policies do not revoke any existing permits and so, current STR owners are not required to use their unit as a long-term rental, nor will any visitation be lost. In fact, the policies, including the numeric cap, allow for some growth in the STR market, and provide future buyers with advance notice of the changes.

Many people bought homes here thinking they were allowed to rent them short-term. They were told this in documents and saw it on the county website. If the county takes away that right now, it could lead to lawsuits and make people lose trust in local leaders. Some owners have spent a lot of money fixing up their homes just so they can rent them. Changing the rules now could hurt those people and stop others from wanting to invest in Mono County.

The ability to rent on a short-term basis will not be revoked for existing STRs. The proposed amendments only apply to new requests for short-term rentals. If homeowners invested money in remodels with the intention of short-term renting prior to receiving approvals, then they undertook a personal risk with no guarantee. Further, even if permits were being revoked, the County has the jurisdictional authority to modify land use regulations based on proper findings in order to protect communities, public health, and safety.

Short-term rentals bring in a lot of money through the Transient Occupancy Tax (TOT). This money helps pay for things the county needs. In addition - there's a trickle down effect: short-term rentals help create jobs for cleaners, property managers, plumbers, electricians, and other workers. If you take away short-term rentals, some people may lose their jobs and the county could lose important money.

Again, no STR permits are being revoked, and, in fact, some growth is proposed. Therefore, current TOT revenue, visitation, and the need for local workers will remain intact and will grow slightly. In addition, the policies will help make units more accessible and available to those same local workers who support the STR industry – the housekeepers, property managers, electricians, plumbers, inspectors, and handymen. The 2024 STR Study identified that every new STR generates a need for 0.8 units of new workforce housing, which these policies do not come close to providing

I don't want to just complaining about possible poor decision - but let's create solutions; Instead of taking away rental rights, let's try other ideas:

- **Ask for volunteers:** Many homes are empty most of the year. The county could ask owners if they'd consider long-term rentals and help them with things like finding renters and managing leases.

An incentive program will be explored through a separate implementation process under Policy 1.D.9. of the MCGP LUE.

- **Support ADUs:** Help homeowners build small extra units (Accessory Dwelling Units) on their property by offering tax breaks, money, or easier permits.

The County already provides prescriptive designs, along with permit streamlining and regulatory relief under state law, for Accessory Dwelling Units. Additional incentives will be explored through a separate implementation process under Policy 1.D.9. of the MCGP LUE.

- **Build in nearby areas:** Look at building more homes in places like Crowley Lake, Chalfant, or Bishop, where there is more space.

Mono County is uniquely constrained by its remoteness, topography, and limited land, 94% of which is publicly owned. Similarly, 98% of Inyo County public land. Mono County currently participates in ongoing regional housing efforts and projects, including those in all communities in Mono County and neighboring jurisdictions. However, the displacement of local residents is inconsistent with the goals of several planning areas that seek to ultimately develop into a moderately sized, self-contained, year-round community, and pushing local housing needs into neighboring jurisdictions has proven to be an ineffective solution to housing.

These new rules won't fix the housing problem, but they will likely cause other serious issues—like legal fights, lost jobs, and upset homeowners. I respectfully ask the Planning Commission to vote no on these proposals and instead work with the community to find fair and helpful solutions.

Thank you for taking the time to read this. I'd be happy to talk more - please feel free to give

me a call.

Sincerely,
Nicole Godoy
760-914-4207
Nicole@DestinationMammoth.com

Mono County Response to Comments #3



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August 20, 2025

Mono County Planning Commission
P.O. Box 347
Mammoth Lakes, CA 93546

To the Mono County Board of Supervisors,

On behalf of the Mammoth Lakes Board of REALTORS®, we respectfully request that you carefully reconsider the proposed short-term rental (STR) amendments and engage in further dialogue with the real estate community and other stakeholders to address our affordable housing needs. The impacts of such policies have been researched throughout the mountain west, and numerous studies have agreed that overly restrictive STR policies can have harmful, long-term effects on communities. These effects include a decrease in jobs and their associated incomes, a significant reduction in county operating budgets, and no increase in the availability or affordability of homes in Mono County.

The proposed amendments will have unintended negative consequences for our local economy, property owners, and the overall vibrancy of Mono County. We urge you to consider the significant negative economic impacts and the infringement on property rights that these restrictive regulations could create.

Economic Impact

STRs are a vital part of Mono County's tourism economy, which supports local businesses like restaurants, shops, and recreational outfitters. Restrictive regulations could significantly reduce visitor numbers, leading to less revenue and potential job losses for these businesses. Fewer visitors due to limited lodging options can result in hiring freezes, reduced hours, or layoffs, directly affecting the workforce that needs affordable housing.

No STR permits are being revoked and, in fact, some growth is proposed. Therefore, current visitor numbers should not be impacted and will actually grow slightly. In addition, the policies will help make units more accessible and available to the local workers who run the businesses that support the STR industry – the restaurants, shops, and recreational outfitters. Again, visitor lodging options will not be reduced and will be permitted to grow slightly. The 2024 STR Study identified that every new STR generates a need for 0.8 units of new workforce housing, which these policies do not come close to providing.

A healthy STR market also contributes to a more dynamic real estate market overall. Restrictions

could reduce property values and make it more difficult for individuals to invest in our community. Additionally, a major source of revenue for the county is the transient occupancy tax (TOT) generated by STRs. Overly restrictive regulations could lead to a substantial decrease in this revenue stream, which directly benefits county services and infrastructure.

The policies are intended to contribute to a market adjustment to prices that reflect the true value of the unit and are affordable without the unit itself generating income. That may, in fact, reduce property values which, in turn, theoretically make the units more accessible for purchase or rent by local residents. The County agrees that overly restrictive regulations may have the impacts cited by MLBOR; however, given these regulations allow existing permits to continue and slight growth in the industry, these policies are not comparable to the ones MLBOR is indirectly referencing (e.g., South Lake Tahoe, Big Bear).

Workforce and Affordable Housing

While some may argue that STRs increase housing costs, overly restrictive policies can paradoxically worsen affordability by reducing the overall housing supply and potentially destabilizing the local economy that supports workers.

Studies, including research by RRC Associates, have shown a correlation between increased restrictions on STRs and a decrease in the overall housing supply available for long-term residents and the local workforce. When regulations become too burdensome, some property owners may choose to sell their properties rather than deal with complex rules or face limitations on their rental income. This reduces the available housing pool for both long-term rentals and potential homeownership for the workforce. A smaller housing supply generally leads to higher prices due to increased competition. Additionally, a weakened local economy can suppress wages, making it harder for the workforce to afford existing housing.

Again, because no STR permits are being revoked, the visitation economy should not be affected and will grow slightly. In addition, long-term rentals are not being regulated and therefore should not be affected, unless they are incentivized because of fewer regulations. Finally, if an STR owner chooses to sell for the reasons cited, it will theoretically be at a lower price than if income generation from the unit is built into the price of the sale, which may be more affordable to local residents.

We must also ask: what is the actual goal of these changes? County representatives have stated that this effort is not about affordable housing, only to later suggest that it is. We know these changes will not create affordable housing, as Mono County cannot control the buying power of individuals purchasing second homes in a destination market. The affordability issue will persist unless the County itself invests in building or acquiring housing.

The County has, in fact, invested in building and acquiring housing. The MLBOR should review the County's adopted housing strategy and actions related to purchasing units in the county and contributing to affordable housing projects in Mammoth Lakes in particular. The County does not intend to control anyone's buying power, but has a responsibility to be aware of how its policies contribute to the marketplace. The STR policies are not a solution alone, but part of a broader effort to address affordable housing which must include more than just constructing new units, which would be a very narrow overall strategy. As an example, according to the 2020 Census, June Lake has 611 residents and 811 housing units, which should be more than enough units to house every individual in

June Lake in a separate unit. Building new units is not the only answer nor the only strategy needed.

Community Considerations for June Lake

The June Lake market, while experiencing a visitor spike during COVID-19, has remained relatively stable in terms of the number of vacation rentals over the last 30 years. We are concerned that the proposed changes are a reaction to a temporary, pandemic-related surge rather than long-term trends, and these policy shifts could have lasting negative effects on our community.

- **No Cap on Vacation Rentals:** We believe there should not be a cap on the number of vacation rentals. We are aware of individuals who hold active permits but are not using their properties as rentals. The County has admitted it cannot monitor permit use because it lacks access to TOT records. This creates a situation where permits are hoarded, leading to an inaccurate picture of rental activity and negatively affecting the local economy. [The County is responsible for determining if a use is appropriate and acceptable, and issuing the authorization to conduct the use. A property owner has the right to exercise that use or not. If the MLBOR believes that not exercising that use is unethical or otherwise unacceptable, they should manage this behavior by individual owners through their profession. Alternatively, a use permit expires after two years if the rights have not been exercised. That timeframe could be reduced, and the MLBOR could report a property to the Mono County Community Development Department as a violation of their use permit.](#)
- **Equal Treatment for All Condo Complexes:** All multifamily housing contributes to our local economy and should be treated equally, regardless of land use designation. These properties have historically operated as "by-right" vacation rentals, and we believe that should continue. This approach also streamlines the permitting process and reduces the administrative burden on County staff. [Alternatives are suggested in the STR report.](#)
- **Impact of Moratorium:** We would like to remind the County that the current extensive workload related to STR permits is largely a result of the two-year moratorium. [This is irrelevant to the proposed policy amendments.](#)
- **Impacts of Resolution R24-038 on Interlaken:** Resolution R24-038 has had a significant impact on the June Lake community, as it disqualifies Interlaken property owners who do not already have an STR permit from ever obtaining one. This is a serious blow to our local economy, as Interlaken accommodates large groups and caters to a higher-end clientele. Many property owners were unaware of this resolution until recently, suggesting a lack of public outreach and transparency. [This particular STR decision had been ongoing for more than two years, was taken to the RPACs and a countywide survey was published, and the decision was made in an open public forum and noticed according to legal requirements. The County provided public outreach and was transparent in its decision makers; the public also has a responsibility to be aware of ongoing discussions and participate if the issue is important to them.](#)
- **Transparency and Public Engagement:** While the Planning Department has stated these issues were brought to the public, only a handful of people attended the CAC meetings. Most property owners were not informed or involved. We believe this process lacks the transparency and public engagement that such impactful decisions require. We are trying to protect private property rights and advocate for fair and informed decision-making. [Please see the "Public Involvement & Research" section of the report detailing the STR Study focus groups, countywide public survey, two rounds of RPAC outreach, two Planning](#)

Commission workshops, and four Board of Supervisor workshops. Numerous opportunities for public input have been available over the past two years.

The June Lake community collectively agreed upon an STR policy in 2016 after over 50 hours of public meetings and more than 300 hours of county staff time. We ask the Board of Supervisors: what is the real goal behind revising a policy that the community already agreed upon? If the recent STR survey showed mixed or neutral support at best, what is the real objective here? [The recent STR survey conducted by the County shows very strong support for nearly all of the proposed policies. Please cite the "mixed or neutral" support being referenced. Further, the 2016 policies were crafted to address neighborhood nuisances and disturbance, not the availability of housing units for residential use and the commodification of housing. Please see the Purpose section of the report.](#)

The Mammoth Lakes Board of REALTORS® invites the Mono County Board of Supervisors to participate in a discussion with our membership to share and understand the role STRs play within our market. We stand ready to work with you to find a balanced solution to this issue.

Sincerely,

Mammoth Lakes Board of REALTORS®

A handwritten signature in black ink, appearing to read 'Karen Nelson', with a long, sweeping horizontal line extending to the right.

Karen Nelson, President