



# SAN LUIS OBISPO COUNTY FARM BUREAU

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Commissioners  
San Luis Obispo County Planning Commission  
County Government Center  
San Luis Obispo, CA 93408

Dear Commissioners:

The San Luis Obispo County Farm Bureau would like to express our concern for the difficult, expensive and lengthy process an applicant must go through to receive a permit to hold events on agriculturally zoned land. This applicant's issue is a prime example of the concerns we expressed during the Events Ordinance hearings.

It would appear that the ability of an agricultural landowner to hold events is already overly burdensome. Utilizing less than one-half (1/2) of one percent of the agricultural land (2.35 acres of 617 acres) for events is definitely incidental and secondary to the agricultural use of the property and in keeping with AGP 6 in the Agriculture Element.

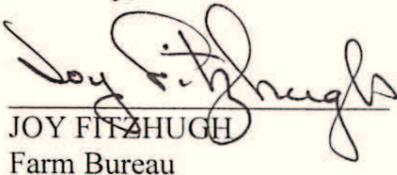
The statement that the events would compromise the long-term productive of the agricultural operation as stated by the Department of Conservation is inaccurate as events are more likely to provide the means to save the ranch's long term productivity by providing the funds needed to maintain the agricultural operation.

The statement that events could lead to loss of agricultural uses on adjacent lands shows how little the understanding is of larger agricultural operations and this proposal. As stated in hearings on the Events Ordinance larger parcels (such as 617 acre parcels) should not have the same restrictive regulations that might be placed on 5 and 10 acres parcels where there activities are in closer proximity to adjoining residences or uses.

These are just a few of the concerns that we see relating to the expense, requirements and the excessive length of time required to apply to have for-profit events on agriculturally zoned land, even on Williamson Act contract land.

I hope you will consider this letter seriously in your review of events on agricultural land.

Sincerely,

  
JOY FITZHUGH  
Farm Bureau

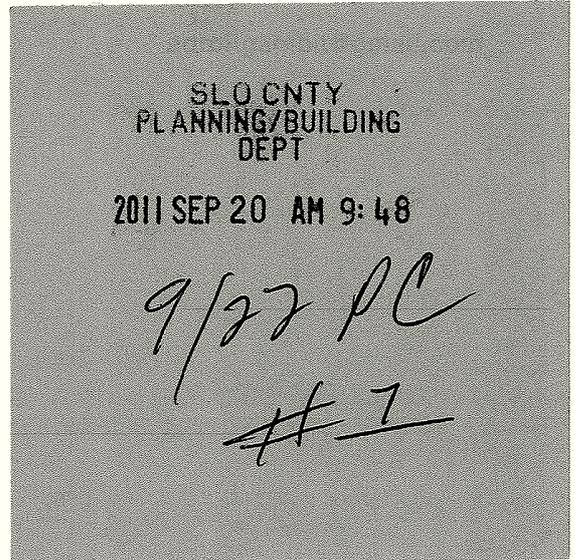
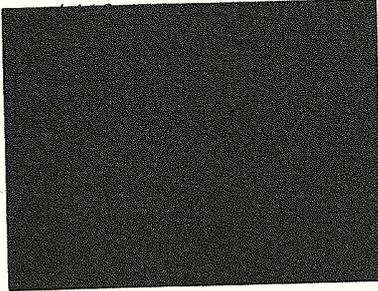
PLANNING COMMISSION

EXHIBIT: 2

DATE: 9/22/11

DO NOT REMOVE FROM FILE

# Richard L. Watkins Real Estate Services



September 19, 2011  
Planning Commissioners  
RE County File Number LRP2009-00005  
c/o Ramona Hedges

Dear Commissioners,

Unfortunately, I will be in San Jose on September 22nd at C.A.R. business meetings discussing, among other things, trends in the regulation of vacation rentals around the state.

In contrast to the copious information that accompanies the consideration of development approvals, little verifiable information exists concerning the performance of the existing ordinance over the past 8+ years. Apparently the TOT and sales tax data that reside with the Tax Collector remain off limits for analysis.

*TOT data could answer these and other questions:*

- 1. What proportion of the TOT revenues for Cayucos and Cambria are derived from vacation rentals, as opposed to the hotel/motel/bed and breakfast establishments?*
- 2. How much of the TOT revenue comes from grandfathered rentals in prime areas?*
- 3. Has the contribution to TOT totals from prime areas changed over the years, reflecting attrition?*
- 4. What is the relative contribution to TOT derived from new vacation rentals that are located outside the prime areas by the requirements location standards?*
- 5. Do these newer rentals in less prime areas produce a disproportionate percentage of their TOT in the Summer season when compared to rentals in prime areas?*

The core question is whether altering the regulation of vacation rentals as a key component of coastal tourism warrants the level of research, analysis and consideration typical of most individual development projects.

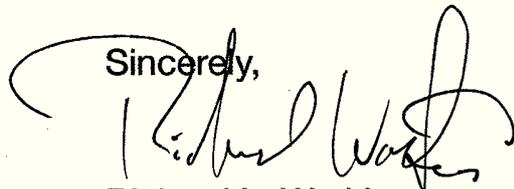
Over its potential 10 year life span the amended section 23.08.165 of the Coastal Zone Land Use Ordinance will affect thousands of residential properties and their property owners, in addition to impacting hundreds of thousands of visitors and the billions of dollars they spend in the County.

Crafting vacation rental regulations may not involve a level of satisfaction to compare with protecting oak trees, riparian habitats, endangered species and groundwater resources, but the consequences to the economic resources of the County are huge.

The visitor serving lodging component of our increasingly tourism based economy is in a much different place than it was in 2005 at the time of the last review of this vacation rental ordinance.

Hotel/motel development on the coast is unlikely to recover in the foreseeable future. When recovery commences, zoning constraints remain. It is critically important that the revised Section 23.08.165 provides for sustained or increased occupancy levels in a wide range of attractive visitor serving lodging in order for tourism to achieve future expansion as a positive economic force.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard L. Watkins", written over the word "Sincerely,".

Richard L. Watkins

CDRE # 00897399