

Exhibit C

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PEBBLE BEACH
COMPANY

January 27, 2026

Zoning Administrator
County of Monterey
1441 Schilling Place
Salinas, CA 93901

Re: PLN250170, Commercial Vacation Rental License Application for 1063 Mission Road

Dear Zoning Administrator,

Pebble Beach Company would like to reiterate our strong opposition to the issuance of commercial vacation rental permits within the Del Monte Forest, including the property at 1063 Mission Road, Pebble Beach. Pebble Beach Company has provided the County of Monterey with a blanket objection letter for all vacation rental permit applications within the Del Monte Forest, a copy of which is attached, and requests denial of the application at 1063 Mission Road on that basis.

Additionally, we note that on January 6, 2026, the Monterey County Board of Supervisors asked staff to revise the vacation rental ordinances to restrict vacation rental licenses in residential areas, and the Planning Commission will hold a hearing of those draft ordinances on February 11, 2026.

The discussion at the Board of Supervisors hearing on January 6, 2026, makes clear that the Board believes there is significant risk to the County General Fund from potential damages from pending litigation against the County. To avoid confusion and reduce potential future legal exposure, Pebble Beach Company requests that the Zoning Administrator seek direction from the Monterey County Board of Supervisors to place a moratorium on processing of all vacation rental license applications Pebble Beach until such time as the Planning Commission and the Board of Supervisors have an opportunity to vote upon revised vacation rental ordinances.

The County's practice of continuing to process vacation rental applications in light of the blanket objection from Pebble Beach Company and the direction of the Board of

Supervisors to revise the existing ordinances, as well as the County's memo of December 12, 2025, that enforcement of alleged vacation rental violations have been suspended combine to create an untenable situation for both residents and owners within Del Monte Forest.

We respectfully request that the permit for 1063 Mission Road be denied and that the Zoning Administrator requests the Board of Supervisors to place a moratorium on processing applications for vacation rentals with residential areas such as the Del Monte Forest.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen Lee". The signature is fluid and cursive, with a large initial "K" and a trailing flourish.

Kathleen Lee
Director of Governmental Affairs and Community Affairs
Pebble Beach Company

Attachments Pebble Beach Company Objection Letters

Cc: Monterey County Board of Supervisors
Monterey County Planning Commission
Craig Spencer
Kelly Donlon
Jade Mason



PEBBLE BEACH
COMPANY

December 4, 2024

Supervisor Glenn Church, Chair
Monterey County Board of Supervisors
168 W. Alisal Street
Salinas, CA 93901

RE: 12/4/24 Item #35, Vacation Rental Study Session

Dear Chair Church,

Pebble Beach Company has repeatedly opposed commercial vacation rentals and unlimited vacation rentals of any kind in Del Monte Forest. We write to emphasize the Company's opposition to Commercial Vacation Rentals and Homestays in Del Monte Forest and request the County prohibit Commercial Vacation Rentals and Homestays throughout the Del Monte Forest by incorporating the prohibition in both the Del Monte Forest Land Use Plan and the Greater Monterey Peninsula Land Use Plan.

At the invitation of Housing and Community Development staff, Pebble Beach Company has submitted to the County a letter objecting to Commercial Vacation Rentals and Homestays within Del Monte Forest. The attached letter sets forth the various legal arguments that support our position.

The Del Monte Forest Land Use plans are written to protect a delicate balance between residential, visitor serving and habitat of the 5,3000 acres of the Del Monte Forest. 1,335 acres of the Forest are conserved as open space, and the remaining acreage is divided between visitor serving and residential. The Company is charged with maintaining this balance between conservation, visitor-serving and protecting the residential character of the Forest. Allowing commercial uses in our residentially zoned areas disrupts this balance and negatively impacts community character as well as our available housing and rental stock.

If the County decides to not prohibit vacation rentals in the Del Monte Forest, Pebble Beach Company reiterates our request that the cap of 4% of vacation rental units apply to the entire Del Monte Forest. As written, the Del Monte Forest is bisected into two different land use plans each with a 4% cap. This creates the potential for a higher density of up to 8% vacation rentals, more than any other planning area in Monterey County, and in a geographic area that already has a high number of visitor serving units. The staff report notes that it may be appropriate to place a 4% cap within the entirety of the Del Monte Forest to minimize clustering of allowable vacation rentals. If the Board decides not to prohibit vacation rentals in the Forest, please direct staff to amend the cap to 4% for the entire Del Monte Forest, both inland and coastal zoning.

Pebble Beach Company is opposed to allowing long-term renters to apply for a Homestay license. As written, Homestays are virtually indistinguishable from commercial vacation rentals

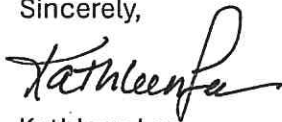
LEGAL AFFAIRS

and enforcement will be a significant challenge. The Company is deeply concerned that Pebble Beach Company security will be the de facto enforcement agency and will be put in harm's way when a renter violates the ordinances and/or refuses to be a good neighbor.

Pebble Beach Company respectfully requests that the Board of Supervisors direct staff to ban Commercial Vacation Rentals and Homestays in the Del Monte Forest, that long-term renters not be allowed to apply for a Homestay license and that if Commercial Vacation Rentals and/or Homestays remain in Del Monte Forest, that the 4% cap be applied to the entire Del Monte Forest covering both the inland and coastal areas of the Forest.

Thank you again for your time and consideration,

Sincerely,

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Kathleen Lee
Director of Governmental and Community Affairs
Pebble Beach Company

Attachment, October 9, 2024, letter from Pebble Beach Company

Cc:

Sup. Adams

Sup. Lopez

Sup. Alejo

Sup. Root Askew



PEBBLE BEACH
COMPANY

October 9, 2024

Melanie Beretti, AICP
Acting Chief of Planning
Monterey County Housing and Community Development
1441 Schilling Place
Salinas, CA 93901

RE: Objection to Issuance of Vacation Rental Permits in Del Monte Forest

Dear Melanie:

Thank you for meeting with us on September 12, 2024, which as you know was the latest in a years-long series of meetings between County staff and Pebble Beach Company relating to short-term vacation rentals. We again discussed Pebble Beach Company's position that vacation rentals, and in particular, Commercial Vacation Rentals and Homestays (which the vacation rental ordinances recently passed by the Board of Supervisors will allow within Del Monte Forest) constitute commercial use of property in violation of the CC&Rs contained in the deeds on residential properties in Del Monte Forest. You invited us to submit this letter, which constitutes the Company's "blanket objection" to the issuance of such permits.

While not all deeds underlying properties in Del Monte Forest are uniform, to the best of my knowledge, every deed has language that prohibits commercial use of the premises, and California courts have concluded that restrictions on vacation rentals contained in CC&Rs are reasonable and enforceable. The language reproduced below constitutes CC&R language which is representative of the language contained in other Del Monte Forest deeds:

No trade, business or profession of any description shall be conducted on said premises. Said premises shall not be used for any purpose whatever except solely and exclusively for the purpose of construction and maintenance of not more than one private single family residence with appurtenant detached guest and servants' cottages (without cooking facilities), greenhouse, garage, and if approved in writing by Grantor, a stable for saddle horses.

The plain meaning of the CC&R language bans short-term vacation rentals in the Del Monte Forest. Arguments to the contrary are entirely unpersuasive. For example, arguing that a use titled "commercial vacation rental" is somehow actually not a commercial use of the property defies logic and would be a problematic position for the County to take. In addition, the fact that commercial vacation rentals operated pursuant to Chapters 7.120 and 7.121 are required to obtain an annual business or operation license and pay transient occupancy taxes makes any such rentals, by definition, a business. Like hotels, vacation rentals are a business conducted for the

purpose of making a profit, and are treated as such by federal laws and the County's own code provisions regulating business operations and the income derived therefrom.

Homestays are virtually indistinguishable from commercial vacation rentals. There are no restrictions on the number of rentals allowed by either classification. The permitting process for Homestays will simply be easier and less expensive, and since there is no cap, these will undoubtedly have the most significant impact on the Del Monte Forest residential community, particularly given the County's admitted challenges with regard to enforcement. Accordingly, Pebble Beach Company also objects to Homestays as a prohibited commercial use of property in Del Monte Forest.

There are three commercial land use designations allowed in Del Monte Forest pursuant to the Del Monte Forest Land Use Plan. Visitor-Serving Commercial allows "Major hotel or inn accommodations," defined as The Lodge, The Inn, Poppy Hills, and the Area M hotel site owned by Pebble Beach Company. The other two commercial designations are solely support functions for the uses permitted in those areas zoned as Visitor-Serving Commercial. The remainder of the Forest is zoned residential, which, consistent with the deeds, does not allow for commercial use.

Separately, for the portion of Del Monte Forest located within the Greater Monterey Peninsula Area Plan (GMP LUP), commercial uses are outright prohibited; the entire area is zoned for residential uses or open space/resource conservation.

Accordingly, Pebble Beach Company believes that operation of vacation rentals in Del Monte Forest would violate both the CC&Rs and both the Del Monte Forest LUP and the GMP LUP, and asks the County on this basis to deny applications for commercial and homestay short-term vacation rentals.

Finally, during our meeting, Pebble Beach Company affirmed its intent to require proof of access from applicants pursuant to Chapter 16.80 of the Monterey County Code, and restates that intent here. Del Monte Forest residents are granted right of access to their single family residence on roads privately owned by Pebble Beach Company subject to the payment of an annual road fee (which in many cases is only \$25 per year). Since commercial use of the property is specifically prohibited, the access agreement does not cover access for that purpose.

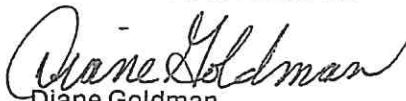
County staff stated that it will not enforce that portion of Chapter 16.80 that explicitly refers to right of access for a specific "Project." We understand the County's position to be effectively "reading out" the law's requirement that "[a]n applicant shall provide . . . [w]ritten permission to use a private road for the project from a private road governing structure[.]" Ch. 16.80.040(A)(3) (emphasis added); see also Ch. 16.80.040(C)(1)(g); Ch. 16.80.040(D)(6). If the applicant has right of access to the property via the private roads for any purpose (i.e., the right to access a home for residential purposes), the County has told us its position is that it will assume right of access via the private roads for the purposes of running a vacation rental. This position runs contrary to the plain text of the law, and in effect deletes the "for the project" requirement from the text of the law. A change of use from residential to commercial constitutes a specific project under the law; indeed, there would be no need for an "application" if the use did not constitute a "project" under the law. The plain text of both the private roads code chapter and the recently enacted short-term vacation rental ordinances support this common sense reading of both laws. As the owner of the

private roads that will be used to access such commercial projects, the law grants Pebble Beach Company the right to grant or deny access for the purposes of such projects under Chapter 16.80. Pebble Beach Company intends to withhold consent for the use of its privately owned and operated roads for such commercial purposes, and respectfully requests the County to reconsider its position and ensure enforcement of Chapter 16.80 as written.

In summary and in accordance with our longstanding public-private partnership on this short-term rental issue, Pebble Beach Company respectfully submits that the County must deny applications for vacation rentals in Del Monte Forest because, among other reasons, such rentals constitute a prohibited commercial use of a residential property. In addition, as the sole owner and operator of private roads in Del Monte Forest, Pebble Beach Company intends to enforce its statutory rights pursuant to Chapter 16.80 to grant or deny access to its private roads in the Forest, and respectfully requests the County's cooperation in this effort.

Sincerely,

PEBBLE BEACH COMPANY


Diane Goldman
General Counsel

- c. Kathleen Lee, Director of Governmental and Community Affairs
Patrick Hovakimian, Chief Legal Officer

Mason, Jade

From: Dave Simonsen & Anne Marangoni <teethntoes@gmail.com>
Sent: Monday, February 2, 2026 3:36 PM
To: Mason, Jade
Subject: Fwd: Project File Number PLN250170
Attachments: IMG_9966.jpeg; IMG_9966 (1).jpeg

This Message Is From an Untrusted Sender

You have not previously corresponded with this sender.

----- Forwarded message -----

From: Dave Simonsen & Anne Marangoni <teethntoes@gmail.com>
Date: Sun, Feb 1, 2026 at 1:10 PM
Subject: Fwd: Project File Number PLN250170
To: Bill Phillips <Bill@billandred.com>

This is what I sent today. I'll be calling the Housing/Community Development planner tomorrow. --Anne

----- Forwarded message -----

From: Dave Simonsen & Anne Marangoni <teethntoes@gmail.com>
Date: Sun, Feb 1, 2026 at 1:07 PM
Subject: Project File Number PLN250170
To: <zahearingcomments@co.monterey.ca.us>

Re: Project File No. PLN250170

Location: 1063 Mission Road Pebble Beach

We are the owners of 1059 Mission Road which is directly adjacent to 1063 as well as 1055 Mission Road which is next to 1059 Mission Road. We have lived at 1055 Mission Road since 1995. We have long term renters with a yearly renewable lease at 1059 Mission, currently two military officers studying Russian at the DLI.

We are opposed to the Project PLN250170 for the following reasons:

- 1) Mission Road is a one lane **residential street**, posted speed 15 MPH, curvy and narrow, used daily by elderly pedestrians, families with young people, people with strollers, dog walkers, joggers and bicyclists as well as cars. Very few houses are on this street, all single family residences. A commercial venture would add car traffic with people unfamiliar with the unique low speed of this street, leading to unsafe conditions. We have attached a photo of Mission Road with an enlargement showing the stucco fence featuring the 1063 address numbers.

2) In the past, owners of 1063 have had parties during golf tournaments; one was so obnoxiously loud with music late at night that we called Pebble Beach security. Security told us they were overwhelmed with the tournament and couldn't help us. We had no recourse but to suffer and commiserate with our neighbors afterwards. So, having a commercial venture on our **quiet street** is not appropriate. We enjoy hearing the birds chirp rather than a cover of "Uptown Funk". The tenants currently living at 1059 Mission specifically told us they require a quiet neighborhood for their studies.

3) It seems to us that this project is simply an attempt by the owners to ameliorate the high expense of living in Pebble Beach. As they chose to live in a **residential neighborhood**, if they cannot afford this house, they should sell it rather than turn it into a commercial business.

We beg you to deny this project. We are unable to appear in person due to our attendance at a conference out of state; however, our feelings are nonetheless strongly involved in opposition to this "Use permit."

Thank you,

Anne Marangoni and David Simonsen

Owners, 1055 Mission and 1059 Mission, Pebble Beach, CA 93953

teethntoes@gmail.com



1063

1067



Mason, Jade

From: Larry Marcus <larry.f.marcus@gmail.com>
Sent: Monday, February 2, 2026 1:01 PM
To: 293-zahearingcomments
Cc: Mason, Jade; Corinne Marcus
Subject: Public comment Opposing PLN250170

This Message Is From an Untrusted Sender

You have not previously corresponded with this sender.

Re: Public Comment Opposing Use Permit for Commercial Vacation Rental, PLN250170 (1063 Mission Rd, Pebble Beach)

Dear Zoning Administrator and Planning Staff at County of Monterey,
I am a nearby resident on Mission Road / in the immediate neighborhood of 1063 Mission Rd, Pebble Beach. I'm writing to formally oppose the requested Use Permit (PLN250170) to allow a Commercial Vacation Rental (transient lodging of 30 days or fewer) at 1063 Mission Rd.

1) This street's physical conditions make short-term rental turnover a safety problem, not a neutral land use

Our portion of Mission Rd is narrow, dark at night, and heavily used by pedestrians and dog-walkers, including families. The posted 15 mph limit is unusually low for a reason: visibility is limited, and there is frequent foot traffic near the roadway edge.

A vacation rental typically increases:

unfamiliar drivers searching for the address (often at night),

- distracted driving (GPS / phone use),

- repeated arrival/departure trips, and guests who do not understand (or respect) a low speed culture.

Even if each guest intends to behave well, turnover itself creates risk that a standard owner-occupied home does not.

2) Parking constraints create clear fire-life-safety and emergency access concerns

There is limited safe parking along the street. Additional guest vehicles and visitor drop-offs routinely lead to:

vehicles parked too close to travel lanes, blocked sightlines on a dark road, impeded access for fire and emergency vehicles, and a higher likelihood of "creative" parking (shoulders, corners, pinch points).

This is a public safety issue, not simply a convenience issue.

3) Incompatibility with a stable, resident-occupied neighborhood character

This is a locals-in-residence street. A commercial vacation rental introduces a lodging use whose impacts are fundamentally different from residential living: frequent turnover, unknown occupants, higher vehicle trips, and increased nighttime activity. Once a street begins to shift toward transient occupancy, it becomes harder to reverse. The County should weigh neighborhood stability and community character as legitimate planning considerations.

4) Noise, parties, light, and late-night activity are foreseeable and difficult to enforce after the fact. Even “well-run” short-term rentals commonly generate: late-night arrivals / departures and car doors, outdoor gathering noise, amplified music or celebrations, excess trash, and brighter exterior lighting left on overnight for guest convenience.

Enforcement tends to be reactive and complaint-driven. Residents shouldn't be put in the position of policing a commercial lodging use next door.

5) There are abundant visitor accommodations without converting residential streets into a lodging corridor.

The Monterey Peninsula has extensive existing visitor lodging options. Approving additional transient lodging in a residential neighborhood is not necessary to serve visitor demand, but it does impose concentrated impacts on immediate neighbors.

Requested action: we , respectfully request that the Zoning Administrator: DENY PLN250170 as inconsistent with public safety and neighborhood compatibility; or, at minimum CONTINUE the hearing and require additional information and enforceable safeguards before any approval is considered, including:

- a detailed parking management plan that prevents street congestion and ensures emergency access,
- a locally available 24/7 property manager with response-time requirements,
- strict occupancy limits tied to on-site parking capacity,
- no events / no parties conditions with meaningful penalties,
- quiet hours and enforceable noise standards,
- exterior lighting restrictions to protect neighbors, and
- a clear enforcement framework that does not rely on neighbors repeatedly documenting violations.

Please include this email in the administrative record for the February 12, 2026 hearing. We appreciate you sending us the notice and keeping us on the interested parties list for notices and future actions. Thank you for your consideration.

Sincerely,
Larry & Corinne Marcus
1054 Mission Rd, Pebble Beach



PEBBLE BEACH COMPANY

February 2, 2026

PROPERTY OWNER: DIVAKARUNI, RENUKA S. TRUST
MAILING ADDRESS: 1063 MISSION RD., PEBBLE BEACH, CA 93953
LOCATION: **LOT:** 10 **BLOCK:** 17 **SUBDIVISION:** MPCC
ASSESSORS #: 007-211-017-000

DEL MONTE FOREST

PROPERTY ADDRESS: 1063 MISSION RD., PEBBLE BEACH, CA 93953

PROPOSED PROJECT: DEL MONTE FOREST VACATION RENTAL

Dear DIVAKARUNI, RENUKA S. TRUST:

Pebble Beach Company ("PBC") has been advised that you have applied or intend to apply for an application to operate a vacation rental at the above mentioned Del Monte Forest Property (the "Property"). We regret to inform you that the proposed use violates the Covenants, Conditions, and Restrictions ("CC&Rs") for the Property, and PBC does not currently consent to the use of its private road system for this purpose.

The Property's CC&Rs state that this property is restricted to residential use only and that business activities are not permitted. Vacation rentals are considered business activities, as demonstrated by the requirement to obtain a license and payment of Transient Occupancy Tax from and to Monterey County. Additionally, PBC is charged with maintaining the delicate balance between habitat, residential use, and visitor serving use under the Land Use Plans applicable to Del Monte Forest, and believes that allowing vacation rentals in residential areas disrupts this balance.

PBC's position on these matters has been communicated to the County of Monterey on numerous occasions, most recently in letters to the Monterey County Planning Department on October 9, 2024, and to the Board of Supervisors dated December 4, 2024. Copies of those letters are attached.

We regret any inconvenience this may have caused and thank you for your understanding.

Sincerely,

PEBBLE BEACH COMPANY

Nikki Simon

Del Monte Forest

Architectural Review Manager

COPY:

Melanie Beretti, Chief of Planning, County of Monterey: BerettiM@countyofmonterey.gov
Stacy Giles, Assistant Planner, County of Monterey: giless@countyofmonterey.gov
Kelly Donlon, Chief Assistant County Counsel, County of Monterey: DonlonKL@countyofmonterey.gov

Monterey County Board of Supervisors:

- Luis Alejo: district1@co.monterey.ca.us
- Glenn Church: district2@co.monterey.ca.us
- Chris Lopez: district3@co.monterey.ca.us
- Wendy Askew: district4@co.monterey.ca.us
- Kate Daniels: district5@co.monterey.ca.us

DEL MONTE FOREST ARCHITECTURAL REVIEW

P.O. Box 1767, Pebble Beach, California 93953 831-625-8455 telephone 831-625-8440 facsimile

www.pebblebeach.com website



PEBBLE BEACH
COMPANY

October 9, 2024

Melanie Beretti, AICP
Acting Chief of Planning
Monterey County Housing and Community Development
1441 Schilling Place
Salinas, CA 93901

RE: Objection to Issuance of Vacation Rental Permits in Del Monte Forest

Dear Melanie:

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LEGAL ¹ AFFAIRS

purpose of making a profit, and are treated as such by federal laws and the County's own code provisions regulating business operations and the income derived therefrom.

Homestays are virtually indistinguishable from commercial vacation rentals. There are no restrictions on the number of rentals allowed by either classification. The permitting process for Homestays will simply be easier and less expensive, and since there is no cap, these will undoubtedly have the most significant impact on the Del Monte Forest residential community, particularly given the County's admitted challenges with regard to enforcement. Accordingly, Pebble Beach Company also objects to Homestays as a prohibited commercial use of property in Del Monte Forest.

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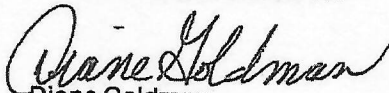
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PEBBLE BEACH COMPANY


Diane Goldman
General Counsel

- c. Kathleen Lee, Director of Governmental and Community Affairs
Patrick Hovakimian, Chief Legal Officer



PEBBLE BEACH
COMPANY

December 4, 2024

Supervisor Glenn Church, Chair
Monterey County Board of Supervisors
168 W. Alisal Street
Salinas, CA 93901

RE: 12/4/24 Item #35, Vacation Rental Study Session

Dear Chair Church,

Pebble Beach Company has repeatedly opposed commercial vacation rentals and unlimited vacation rentals of any kind in Del Monte Forest. We write to emphasize the Company's opposition to Commercial Vacation Rentals and Homestays in Del Monte Forest and request the County prohibit Commercial Vacation Rentals and Homestays throughout the Del Monte Forest by incorporating the prohibition in both the Del Monte Forest Land Use Plan and the Greater Monterey Peninsula Land Use Plan.

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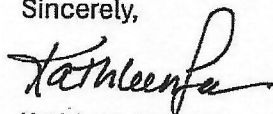
Post Office Box 1767, Pebble Beach, California 93953 831-647-7500 telephone 831-625-8411 facsimile

and enforcement will be a significant challenge. The Company is deeply concerned that Pebble Beach Company security will be the de facto enforcement agency and will be put in harm's way when a renter violates the ordinances and/or refuses to be a good neighbor.

Pebble Beach Company respectfully requests that the Board of Supervisors direct staff to ban Commercial Vacation Rentals and Homestays in the Del Monte Forest, that long-term renters not be allowed to apply for a Homestay license and that if Commercial Vacation Rentals and/or Homestays remain in Del Monte Forest, that the 4% cap be applied to the entire Del Monte Forest covering both the inland and coastal areas of the Forest.

Thank you again for your time and consideration,

Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen Lee", with a stylized flourish at the end.

Kathleen Lee
Director of Governmental and Community Affairs
Pebble Beach Company

Attachment, October 9, 2024, letter from Pebble Beach Company

Cc:

Sup. Adams

Sup. Lopez

Sup. Alejo

Sup. Root Askew

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