

Exhibit B

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Tiny Homes/Mobile Homes Inquiry

1. Do Tiny Homes Qualify as ADUs in Big Sur?

From my research, it seems that the answer is yes. According to Monterey County Code [Section 21.06.372](#), an “Accessory Dwelling Unit” includes a manufactured home, which in turn includes a tiny home if it meets the requirements of [Section 18007 of the California Health and Safety Code](#). Does this interpretation hold true in your experience?

The applicable zoning for the Big Sur area is Monterey County Code (MCC) Section 20.06.375, this section currently reads “Accessory Dwelling Unit” means a permanent residence, secondary to an existing main dwelling, which provides complete independent living facilities for one or more persons. It shall include permanent provision for living, sleeping, eating, cooking, and sanitation on the same parcel where the single-family dwelling is situated.”

The recently adopted Zoning Code Amendments that were adopted by the Board of Supervisors and are under consideration by the Coastal Commission will amend MCC Section 20.06.375 to further clarify what is considered an ADU:

“Accessory Dwelling Unit” or “ADU” means an attached or a detached residential dwelling unit that provides complete independent living facilities for one or more persons and is located on a lot with a proposed or existing primary residence. It shall include permanent provisions for living, sleeping, eating, cooking, and sanitation on the same lot as the single family or multifamily dwelling is or will be situated. An Accessory Dwelling Unit also includes the following: (1) an efficient unit, as defined in Section 17958.1 of the California Health and Safety Code, as may be amended; (2) a manufactured home, as defined in Section 18007 of the Health and Safety Code, as may be amended; and (3) a tiny home, if the tiny home meets the requirements of Section 18007 of the Health and Safety Code, as may be amended.

In both situations, yes, a Tiny Home will qualify as an ADU if it meets the definition of the following: MCC Section 20.06.375 (current regulations and the regulations under consideration by the Coastal Commission), the requirements of MCC Chapter 20.64 Regulations for Accessory Dwelling Units (current regulations and the regulations under consideration by the Coastal Commission), Section 18007 of the California Health and Safety Code and Appendix AQ of the Residential Building Code.

2. Are Mobile Homes Allowed in Big Sur, and Can They Qualify as ADUs?

We’re having trouble confirming whether mobile homes are allowed in the Big Sur Land Use Plan area, and if so, whether they can qualify as ADUs. You had mentioned the need for them to be tied into septic systems. We would appreciate any clarification or direction on where to find clear guidance.

Some key definitions that help frame this answer include the following:

1. MCC Section 20.06.780 defines a Mobilehome to mean “a vehicle designed and equipped for human habitation”.
2. MCC Section 20.06.930 defines a “recreational vehicle” to mean “a vehicle designed and used for temporary human habitation and with its wheels in place and primarily used for recreational purposes”.
3. MCC Section 20.06.380 defines “Dwelling unit, manufactured” to mean a dwelling structure, constructed in part or in whole off the building site, including a mobile home meeting the standards of the National Manufactured Housing and Construction Safety Act of 1976, and subsequently transported to the site and installed on a permanent foundation. A manufactured dwelling unit does not include a mobile home, a mobile accessory building or structure, a recreational vehicle or a commercial coach”.

As noted in both ADU definitions above (current regulations and regulations under consideration by Coastal Commission), an ADU shall include permanent provisions for living, eating, cooking, and sanitation and can include various housing types if they met specified provisions of the Health and Safety Code in addition to the California Building Code.

Manufactured housing meeting the requirements of Health and Safety Code Section 18007 is allowed in Big Sur and can qualify as an ADU. Manufactured Housing is permitted by the State Department of Housing and Community Development (CA HCD) for building construction. Utility connections and foundation construction require a permit from the County of Monterey Housing and Community Development Department (HCD).

A manufactured dwelling unit/manufactured housing is permitted in the Big Sur area as an ADU. Mobilehomes and/or recreational vehicles are not permitted as ADUs in the Big Sur area.

3. Mobile Homes/Tiny Homes on Wheels vs. Fixed Foundations

One of our board members asked whether there's a regulatory difference between placing a mobile or tiny home with wheels intact on a property versus removing the wheels and placing the unit on a foundation. Would the permitting or zoning requirements differ depending on the structure's permanence? When I did some digging on this, I noticed that if the manufactured home was placed on a slab, it needs to essentially “look like an actual building” which made me curious about Airstream trailers which definitely don't look like brick-and-mortar structures...

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4. Shared Facilities for Clustered ADUs or Mobile Homes

We're curious whether current policy supports a setup where multiple ADUs or mobile homes (e.g., 4 units) on one property share communal kitchen and bathroom facilities. Would this fall under something like a Single Room Occupancy (SRO) model? We suspect this isn't currently supported but would love confirmation.

ADUs are currently defined by County Code and State Law as units that provide independent living facilities such as Bathroom and Kitchen. This communal model would fall under SRO subject to 20.64.033 - Regulations for single room occupancy (SRO) facilities.

5. Status of ADU/JADU Ordinance Amendments

Our understanding is that the amendments were adopted by the Board of Supervisors in February 2025, with a 60-day window for submission to HCD, and subsequent review by the California Coastal Commission. Do you know whether the amendments have been submitted to the CCC yet?

The Board of Supervisors adopted a resolution of intent to submit ADU coastal amendments to the California Coastal Commission in February 2025. The amendment was formally submitted to the Coastal Commission in July 2025.

6. Other Policy Updates Tied to Housing

We know the LUP Update, ADU Ordinance, and 6th Cycle Housing Element are interconnected and vital for community housing in Big Sur. We haven't yet done a deep dive into the Housing Element, we're especially interested in the following proposed LUP updates, and would love to know how CABS can support these efforts or provide feedback, especially on the first two points (which ties into question 4 above). The ADU/JADU Ordinance updates help cover the third point.

From Section 5.4.3, Specific Policies I: Low and Moderate Income Housing (Ad Hoc version):

- Allow non-traditional housing types such as single-room occupancy units, modular housing, and yurts for long term housing*
- Provide an expedited and cost effective process for rehabilitation to meet minimum health and safety standards of substandard and/or illegal units to use for long term housing.*
- Encourage geographic dispersion of long term rental housing by allowing accessory dwelling units.*
- Encourage residential long-term rental housing on private properties through contracts with businesses.*

Are there particular areas where support or input from CABS or public comment would be most valuable? It seems that the ADU Ordinance is already past that point, however, I know there are still opportunities with the LUP update and possibly the Housing Element.

The Big Sur Coast Land Use Plan update process would be a good opportunity for members of the public to be involved. The draft LUP calls to address the lack of affordable housing in the Big Sur coast planning area.

Both the Housing Element and the Big Sur LUP update call for consideration of non-traditional housing types to stimulate housing production. To continue engagement with both efforts, you can sign up for the interested parties list. Please feel free to contact me and I can get you added to the interested parties list and can discuss additional ways to engage with both efforts via public comment.

Contact: Sarah Wikle, Principal Planner – Advance Planning, wikles@countyofmonterey.gov, (831) 784-5700

Resources:

1. Title 20 (Coastal Zone) Zoning Ordinance: [Mini TOC: Title 20 - COASTAL ZONING | Code of Ordinances | Monterey County, CA | Municode Library](#)
2. Land Use Regulations – Big Sur: [Land Use Regulations | County of Monterey, CA](#)
3. Big Sur LUP update page: [Big Sur Coast Land Use Plan Update \(REF 210024\), LRPWP Task No. 21-08 | County of Monterey, CA](#)
4. Housing Element update page: [General Plan Elements Update: Housing Element 6th Cycle Update 2023-2031 \(REF220020\), LRPWP Task No. 21-02 | County of Monterey, CA](#)
5. Title 20 ADU Ordinance Amendments that are under consideration by the Coastal Commission for Certification: [County of Monterey - File #: 25-049](#)