

# Sonoma County Planning Commission STAFF REPORT

**FILE:** ORD25-0003

**DATE:** September 4, 2025 **TIME:** At or after 1 PM

STAFF: Katerina Mahdavi, Project Planner

A Board of Supervisors hearing on the project will be held at a later date and will be noticed at that time.

# **SUMMARY**

**Applicant:** County of Sonoma

Supervisorial District(s): All

**Description:** Amendments to Sonoma County Code Chapter 26 (Zoning Regulations),

Articles 06, 22, and 88 to establish a cap on the number of attendees allowed at periodic special events and to clarify periodic special event permitting

processes, public noticing procedures, and term definitions.

**CEQA Review:** Exempt under CEQA Guidelines Section 15061(b)(3)

### **RECOMMENDATION**

Permit Sonoma recommends that the Planning Commission:

- 1. Accept the staff report and presentation;
- 2. Open and close the public hearing to accept public comments;
- 3. Adopt a resolution recommending that the Board of Supervisors amend Sonoma County Code Chapter 26 (Zoning Regulations), Articles 06, 22, and 88 to establish a cap on the number of attendees allowed at periodic special events and to clarify periodic special event permitting processes, public noticing procedures, and term definitions, as shown in Exhibit A.

# **EXECUTIVE SUMMARY**

Periodic special events, formerly called cultural events, are part of Sonoma County's cultural fabric and drive economic activity. Sonoma County remains an in-demand destination for periodic special events. These events are permitted in all zoning districts ministerially through a zoning permit. Staff have identified the need to clarify procedures and terms and to align standards with current interpretations and practices for efficient processing of periodic special event permit applications. Recent applications for recurring events that attract a high number of attendees have further demonstrated that site-specific analysis is needed to adequately assess and reduce impacts of larger periodic special events, which is not feasible through a ministerial permitting process.



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Amendments to land use regulations governing events and similar activities will be evaluated during the ongoing comprehensive General Plan Update, with input from the Planning Commission, Board of Supervisors, and broader community. In the interim, staff proposes establishing a 2,500-person cap on the number of attendees for periodic special events rather than the current ordinance language that is silent on event size, until such time as the County and staff can revisit events regulation in the context of the general plan update and associated environmental review. Other proposed code amendments will clarify permitting and public noticing procedures and create consistency in the language used throughout the zoning code. Staff proposes the ordinance to take effect starting January 1, 2026.

### PROJECT DESCRIPTION

Staff proposes an update to provisions of Sonoma County Code Chapter 26 (Zoning Regulations) governing periodic special events to establish a cap on the number of attendees, define what is considered "periodic" consistent with historic practice, clarify permitting and public noticing procedures, and create consistency in the language used throughout the zoning code. Staff proposes the ordinance to take effect starting January 1, 2026.

The proposed ordinance includes the following amendments to the Zoning Code:

- Amendments to Chapter 26 (Zoning Regulations), Articles 06 and 88 to improve consistency and clarity
  throughout the Zoning Code by replacing references to temporary events, cultural events, and
  occasional cultural events with the term "periodic special events," in alignment with the definitions in
  Article 04.
- Amendments to Chapter 26 (Zoning Regulations), Article 22 to:
  - Codify the longstanding department interpretation that periodic or occasional events may occur no more than four times within a two-year period;
  - o Require separate zoning permits for all periodic special events held 30 or more days apart;
  - Reduce the number of allowed attendees from unlimited to 2,500 for all periodic special events;
     and
  - Remove redundant appeal procedures and clarify that courtesy public notices are provided to neighbors of a proposed event site after permit issuance.

### **BACKGROUND**

## **Historic Zoning Regulations**

Consistently since 1990, the Sonoma County Zoning Code has defined periodic special events as "parades, concerts, festivals, races, and gatherings which attract, either by direct participation, or as spectators, a large gathering of people." The proposed amendments remain consistent with this definition. The 1990 zoning ordinance also identified an appeal avenue for periodic special events similar to current zoning code language regarding courtesy notifications. In 2021, the Zoning Code was reformatted, however, the general definition for occasional or periodic special events (formerly called cultural events in the code) has remained unchanged.





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### **Past Zoning Code Interpretation**

In 2008, the Board of Zoning Adjustments adopted Resolution No. 08-003 interpreting the term "occasional" as used in the Zoning Code in the context of cultural events to mean "no more than 4 days in a one-year period and/or no more than one year in a row." (See Attachment 2.) The resolution also interpreted "a large gathering of people" to mean more than 35 persons and clarified permitting requirements for transient use of residential properties for event purposes.

In 2020, Permit Sonoma management established a formal interpretation for staff to quantify "occasional" cultural events subject to a zoning permit (Attachment 3). Consistent with that interpretation, the Planning Division currently allows "occasional" or "periodic" special events to be held on average twice per year in any two-year period on a given site. No definition of "occasional" or "periodic" is currently provided in the zoning code; however, Zoning Code Sec. 26-88-085(8), Agricultural Farmstays, provides a specific standard for "occasional" cultural events on farmstay properties, permitting "up to four (4) times per year, but for no more than two (2) years in a row."

#### **DISCUSSION**

### **Defining Periodic**

The proposed ordinance would codify the longstanding interpretation of the terms "occasional" and "periodic" as used in the Zoning Code in reference to special events. Past interpretations from the Board of Zoning Adjustments and department management have permitted up to four events to occur over a two-year period on a given site, similar to current allowances for events on agricultural farmstays, as permitted by Zoning Code Section 26-88-085. The proposed ordinance would specify that up to four periodic special events may be permitted over a two-year period on any site.

## Cap on Attendees

Permit Sonoma conducted an audit of 85 event permits with more than 28 attendees since 2016 and found an average of 760 attendees across all events. For events with greater than 500 attendees, the average event size has been 2,634 people and the greatest event size has been 5,000 people. Because periodic special events are permitted ministerially in any zoning district, Permit Sonoma is not able to conduct site-specific analysis during the permitting process to evaluate potential impacts of larger events, such as noise or traffic.

The comprehensive General Plan Update (i.e. <u>General Plan Sonoma</u>) is underway and will soon begin the policy development phase, during which assessment of existing conditions, input from the Planning Commission and Board of Supervisors, and community engagement will shape the drafting of new and amended land use policy. Amendments to policies and regulations for periodic special events and other types of event activities will be evaluated during that process. Because there is currently no size limit on periodic special events and larger events are more likely to have greater impacts, the proposed ordinance would establish a maximum of 2,500 attendees per event until more specific parameters based on site conditions and location can be developed with the General Plan Update. Events larger than 2,500 attendees would be required to be held on sites zoned for large public assembly with a use permit.

The proposed ordinance would take effect on January 1, 2026 to avoid conflicts with already permitted or planned events through the end of the year. Permit Sonoma will conduct robust outreach about the attendee cap to inform the public about the new change.





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#### **Policy Option**

If the Commission would prefer to offer a permitting option for periodic special events to exceed the cap on attendees, staff recommends requiring a use permit that would be time-limited for five years, prohibit permanent site improvements, allow no more than two events per year on a site, and be tied to the property owner at the time of application. Use permits are discretionary, which would allow for site-specific analysis of event impacts and project conditions of approval. The maximum number of attendees proposed by an applicant would be evaluated during permit processing. Because use permits often have lengthy approval timelines and higher permit fees, staff recommends a term limit of five years to reduce the burden on applicants and the department for recurring events. To ensure that events permitted with a use permit continue to be truly periodic, staff recommends prohibiting permanent site improvements and limiting events to an average of two per year on a site granted a use permit. Staff further recommends that these use permits automatically expire upon sale or transfer of the parcel, even if the term limit has not been met.

#### **Appeal Allowances**

Since 1990, the Zoning Code has identified an appeal avenue for periodic special events similar to current code language regarding courtesy notifications. The proposed amendments remove duplicative and conflicting appeal avenues for periodic special events while aligning with current practice. These amendments would not remove an appeal avenue for periodic special events.

#### Periodic Special Events vs. Winery Events

In 2023, the Board of Supervisors adopted Ordinance No. 6404 regulating winery events in Zoning Code Sec. 26-18-260, *Winery Definitions and Standards*, which established standards for wineries, tasting rooms, and winery events. The proposed amendments will not affect these existing standards and definitions, which are specific to wineries, tasting rooms and winery related events and that require a use permit for the land use entitlement.

Periodic special events have their own definition and standards and require a zoning permit. Permit Sonoma's historical practice has been to allow periodic special events with a zoning permit in addition to a use permit's approved events. Recent Board of Zoning Adjustment practice has been to condition use permits with proposed events prohibiting the allowance for additional events through the periodic special event permitting process. In these instances, requests for additional events would instead require a use permit modification. The proposed ordinance would have no impact on winery event activities.

#### **General Plan Consistency**

The proposed zoning code amendments are overall compatible with the goals, objectives, and policies of the Sonoma County General Plan that seek to reduce land use impacts, including but not limited to noise and traffic, and support tourism and economic activity. The proposed amendments do not conflict with any General Plan policy because the General Plan does not limit the frequency or size of periodic special events.

## **Environmental Review**

permit

SONOMA

The proposed amendments to the Zoning Code are exempt from the California Environmental Quality Act (CEQA) under CEQA Guidelines Section 15061(b)(3) because CEQA applies only to projects which have the potential for causing a significant effect on the environment. The project involves minor updates to Zoning Code to clarify definitions and codify current procedure and practice. The amendments do not change the number of events allowed under current Permit Sonoma policy. The current Zoning Code text does not limit the number of



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attendees at periodic special events, and this ordinance would specify a cap on attendees. It can be seen with certainty that there is no possibility the proposed Zoning Code amendments will result in a direct or indirect physical change in the environment.

# **RECOMMENDATION**

Permit Sonoma recommends that the Planning Commission:

- 1. Accept the staff report and presentation;
- 2. Open and close the public hearing to accept public comments;
- 3. Adopt a resolution recommending that the Board of Supervisors amend Sonoma County Code Chapter 26 (Zoning Regulations), Articles 06, 22, and 88 to establish a cap on the number of attendees allowed at periodic special events and to clarify periodic special event permitting processes, public noticing procedures, and term definitions, as shown in Exhibit A.

## **ATTACHMENTS**

Attachment 1. Draft Planning Commission Resolution

Exhibit A. Draft Amendments to Sonoma County Code Chapter 26, Articles 06, 22, and 88

Attachment 2. Board of Zoning Adjustments Resolution No. 08-003

Attachment 3. Planning Policy Interpretation Memo Re: Occasional Cultural Events, dated February 26, 2020



