



2550 Ventura Avenue
Santa Rosa, CA 95403

p: (707) 565-1900
f: (707) 565-1017

Tennis Wick
Director

Scott Orr
Assistant Director

Michelle Arellano
Administration

Nathan Quarles
Engineering and Construction

Jesse Cablk
Code Enforcement

Genevieve Bertone
Communications

Steve Mosiurchak
Fire Marshal

John Mack
Natural Resources

Brian Keefer
Ombudsperson

Sonoma County Planning Commission STAFF REPORT

FILE: ZCE23-0008

DATE: August 21, 2025

TIME: 1:05pm

STAFF: Levan King Cranston, 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

Property Owner:	Sandra Jordan
Applicant:	Sandra Jordan
Address:	9887 Eastside Road, Healdsburg CA
Supervisory District(s):	District 4
APN:	066-300-063
Description:	Request for a zone change to remove the Z (Accessory Dwelling Unit Exclusion) Combining District on a 2.63-acre parcel located along Eastside Road.
CEQA Review:	Statutory Exemption Public Resources Code Section 21080.17 and CEQA Guidelines 15282(h); Categorical Exemption: CEQA Guidelines Section 15305
General Plan Land Use:	LIA 60 (Land Intensive Agriculture, 60 acres per dwelling unit density)
Specific/Area Plan Land Use:	Not Applicable
Ordinance Reference:	Sec. 26-06-010 - 040- Agriculture and Resource Zones Sec. 26-76-005 – Accessory Dwelling Unit Exclusion Combining District Sec. 26-88-060 – Accessory Dwelling Units
Zoning:	LIA (Land Intensive Agriculture District) B6 (60-acres per dwelling unit density) and Combining District for Z (Accessory Dwelling Unit Exclusion)



RECOMMENDATION

Permit Sonoma Planning staff recommends the Planning Commission adopt a resolution recommending that the Board of Supervisors approve a Zone Change to remove the Z (Accessory Unit Exclusion) Combining District from the subject parcels to allow for the potential development of accessory dwelling units and find the project exempt from the California Environmental Quality Act under Public Resources Code Section 21080.17 and CEQA Guidelines Section 15282(h); and CEQA Guidelines Section 15305. No exceptions listed under Section 15300.2 apply.

EXECUTIVE SUMMARY

The property owner requests a zone change to remove the Accessory Dwelling Unit Exclusion (Z) Combining District on a 2.63-acre parcel, to allow future use of an accessory dwelling unit on the subject property. The Z Combining district was applied to the subject properties as part of the implementation of the 1989 General Plan, which aimed to protect agricultural lands from potential overdevelopment of residential use and conversion to nonagricultural uses.

In 2019, the Board of Supervisors adopted Ordinance No. 6285 approving removal of the Z (Accessory Dwelling Unit Exclusion) Combining District from approximately 1,924 specified parcels countywide, including parcels over 10 acres within the Land Intensive Agriculture (LIA), Land Extensive Agriculture (LEA), and Diverse Agriculture (DA) Zoning Districts that met specific screening criteria of former Housing Element Policy HE-3c. While the subject parcels did not pass the screening criteria in 2019, assessing the removal of the Z Combining District on a case-by-case basis continues to be consistent with current Housing Element goals and objectives to increase opportunities for the production of affordable housing. After further review of current zoning regulations, mapping information, and site conditions related to traffic, wildfire risk and groundwater, staff finds the subject parcel meets the criteria for removal of the Z Combining District. Therefore, staff recommends removal of the Z combining district from the subject property.

PROJECT SITE AND CONTEXT

Background

The subject parcel was rezoned to “AE” Agricultural Exclusive zone in 1975 (Ordinance No. 1928) when the Zoning Ordinance was updated to reflect provisions of the California Land Conservation Act of 1965 to protect and preserve agricultural land uses, to deter the conversion of agricultural land to noncontiguous urban development, and to encourage the retention of open space. On July 10, 1990, the Board of Supervisors adopted Ordinance No. 4225 which codified prohibited uses that could negatively impact agricultural uses or promote conversion to non-agricultural activities by applying the Z Combining District. This applied the Z Combining District prohibiting ADUs on all parcels formerly zoned Agricultural Exclusive (AE) while rezoning such parcel to the new designation of Land Intensive Agriculture (LIA), to match the 1989 General Plan land use designation.

Since 2005, the County has been accepting and approving requests to remove the Z Combining District on a case-by-case basis.

In 2009, the Board of Supervisors adopted General Plan Policy HE-3c to “review Z Combining District restrictions on agricultural parcels of less than 10 acres countywide and consider removing the restrictions where appropriate.”



In 2019 the County adopted Ordinance No. 6285, which removed the “Z” Accessory Dwelling Unit Exclusion Combining District from approximately 1,924 specified parcels located in the LIA, LEA, and DA zoning districts countywide that met screening criteria related to fire hazard zones, biotic habitat, groundwater, and traffic, Land Conservation Contracts.

The subject parcel met all of the 2019 countywide screening criteria, except the parcel is within a Fire Hazard Severity Zone, and until recently was subject to a Land Conservation Contract which has now been rescinded.

In 2023, the Board of Supervisors adopted the current Sonoma County Housing Element which provides policies that speak to housing opportunities which includes Accessory Dwelling Units. General Plan Housing Element Policy HE-3a intends to eliminate unnecessary regulatory constraints to the production of affordable housing. The removal of the Z combining district on the subject property aligns with this General Plan policy by allowing housing opportunities including the construction of an accessory dwelling unit.

Site Characteristics

The 2.63-acre project site borders adjacent agricultural properties, and is accessed from Eastside Road, approximately 1-mile west of the town of Windsor. The parcel contains two existing agriculture storage buildings, two existing nonfunctional employee restrooms, and one storage shed. A new septic system is proposed under Permit Number SEP21-0424, and will have capacity to support the existing restrooms, and a future ADU.

Area Context and Surrounding Land Uses

The parcel is surrounded by agricultural (vineyard) and residential land uses. All adjacent parcels along Eastside Road are zoned LIA (Land Intensive Agriculture) B6 20 (20 acres per dwelling unit density). Many properties located to the north are included within the Z (Accessory Dwelling Unit Exclusion) Combining District. However, a collection of properties both east and south of the subject property are not included within the Z (Accessory Dwelling Unit Exclusion) Combining District.

Significant Applications Nearby

The countywide Z Removal, approved under Ordinance No. 6285 in 2019, included parcels throughout the county that met the screening criteria.

Access

The parcel is accessed off Eastside Road, a county maintained public road.

Wildfire Risk

The subject property is within the Fire Hazard Severity Zone and is specifically a Non-Wildland area. The addition of an ADU is not anticipated to substantially increase fire risk on the property as the property is relatively flat and surrounded by agricultural land, there is adequate access to a county-maintained public road, and the area is in a Class 1 Groundwater Availability Area. A future ADU building permit will be required to comply with Fire Safe Standards for new development and defensible space.



Water/Wastewater/Utilities

The parcel is in a Class 1 Groundwater Availability Area (Major Groundwater Basin) indicating there is water available on site. A new septic system is proposed under Permit Number SEP21-0424.

Agricultural Conditions/Land Encumbrances/Contracts

The parcel was subject to a land conservation contact (Williamson Act) under Document Number 1997-014742, however this has been rescinded pursuant to Government Code 51257, and pursuant to action of the Sonoma County Board of Supervisor, Resolution Number 09-0237.

Other Environmental Conditions

The entire property is located within the VOH (Valley Oak Habitat) Combining District. Any future tree removal must be done in accordance with the VOH combining district.

PROJECT DESCRIPTION

A zone change request to remove the Z (Accessory Dwelling Unit Exclusion) Combining District from a 2.63-acre property.

Ordinance and Project History

The table below summarizes key project milestones and events.

Date	Ordinance History/Project Milestone
July 10, 1990	The parcel was rezoned to Land Intensive Agriculture with a Second Dwelling Unit Exclusion Combining District when the Board of Supervisors adopted Ordinance No. 4225 to rezone parcels to match General Plan land use designations and implement the 1989 General Plan.
Jan. 26 1993	The Board of Supervisors adopted Ordinance No. 4643 to rezone agriculturally zoned parcels to match new General Plan land use designations.
Jan. 24, 2017	The Board of Supervisors adopted Ordinance No. 6191 amending second dwelling unit regulations, adding junior accessory dwelling unit regulations, and reducing local regulatory barriers for constructing new accessory dwelling units in accordance with amendments to Gov. Code § 65852.2.
Sep. 17, 2019	The Board of Supervisors adopted Ordinance No. 6285 for removal of the “Z” Accessory Dwelling Unit Exclusion Combining District from approximately 1,924 specified parcels located in the LIA, LEA, and DA zoning districts countywide.
Sep. 14, 2021	The Board of Supervisors adopted Ordinance No. 6352, updates to the Accessory Dwelling Unit and Junior Accessory Dwelling Unit Ordinance, in compliance with Government Code Sections 65852.2 and 65852.22.
Aug. 22, 2023	The Board of Supervisors adopted the Sonoma County Housing Element which provides policies that speak to housing opportunities which includes Accessory Dwelling Units.

The table below summarizes key project milestones and events.

Date	Project Event/Milestone
July 21, 2023	<i>Zone Change application submittal to Permit Sonoma</i>
July 21, 2023	<i>Referral Not Required</i>
December 1, 2023	<i>Land Conservation Contract rescinded pursuant to Government Code 51257, and pursuant to action of the Sonoma County Board of Supervisor, Resolution Number 09-0237</i>
August 1, 2025	<i>Public notice for Planning Commission hearing</i>

ANALYSIS

General Plan Consistency

General Plan Housing Element Policy HE-3a intends to eliminate unnecessary regulatory constraints to the production of affordable housing. The removal of the Z combining district on the subject property aligns with this General Plan policy by allowing housing opportunities including the construction of an accessory dwelling unit.

General Plan Housing Element Policy HE-6e intends to provide opportunities throughout the county for all household income cohorts while avoiding or mitigating displacement of existing residents. The removal of the Z combining district on the subject property aligns with this General Plan policy by allowing the use of an Accessory Dwelling unit, a housing option, small in size (maximum 1,200-square-feet), which can support a range of household income cohorts.

The County of Sonoma has historically used the Z combining zone to preclude ADUs where due to the unique circumstances of a lot, an ADU may be unsafe or infeasible due to lack of water, high fire risk, or other factors. Permit Sonoma supports applications for rezoning to remove the Z Combining Zone, where an applicant has demonstrated that these circumstances no longer apply and that all current ADU regulations can be met. As discussed below with respect to zoning consistency, the applicant has demonstrated how an ADU could be supported on the site. Granting the requested rezone would be consistent with the general plan and would increase housing opportunities by removing regulatory barriers that unnecessarily constrain the production of affordable housing which could be used to house long-term tenants and is precluded by county code for use as a short-term or hosted rental.

Zoning Consistency

Z Accessory Dwelling Unit Exclusion Combining District

Applications to remove the Z combining district must be consistent with Article 76 of the Sonoma County Zoning Code, Accessory Dwelling Unit Exclusion Combining District. Section 26-76-005 states the following reasons for applying the Z combining district:

The purpose of this district is to provide for the exclusion of accessory dwelling units in the following areas:

- a) Areas where there is an inadequate supply of water for drinking or firefighting purposes,*
- b) Areas where there are inadequate sewer services or danger of groundwater contamination,*
- c) Areas where the addition of second units would contribute to existing traffic hazards or increase the burden on heavily impacted streets, roads, or highways, and*
- d) Areas where, because of topography, access, or vegetation, there is a significant fire hazard.*

The Z Combining District criteria listed above does not apply to the subject parcel as discussed further below.

- a) **Water Supply.** The Z combining district was not originally applied to the subject parcel for reasons related to water supply because the parcel is located in a Class 1 Groundwater Availability Area. The addition of Accessory Dwelling Units on the subject property is not anticipated to cause any adverse impacts to existing groundwater in the area.
- b) **Wastewater Disposal.** The Z combining district does not appear to have been applied to the subject parcel for reasons related to inadequate wastewater disposal. Although Permit Sonoma does not have septic records for the existing residence, Permit Sonoma is currently reviewing an application for a Septic System under Permit Number SEP21-0424 which would accommodate for an Accessory Dwelling Unit on the subject property. Additionally, the parcel is not located in an Onsite Wastewater Treatment Systems Manual Waiver Prohibition Area.
- c) **Traffic Hazards.** The Z combining district was not applied to the subject parcel for reasons related to traffic hazards. The project site is located on Eastside Road, with adequate ingress and egress onto Eastside Road. The addition of an accessory dwelling unit would not adversely contribute to traffic hazards or increase the burden on heavily impacted streets, roads, or highways in the area.
- d) **Fire Hazards.** The subject property is within the Fire Hazard Severity Zone, and has a risk level of Non-Wildland. The addition of an ADU is not anticipated to substantially increase fire risk on the property as the property is relatively flat and surrounded by agricultural land, there is adequate access to a county-maintained public road, and the area is in a Class 1 Groundwater Availability Area. A future ADU building permit will be required to comply with Fire Safe Standards for new development and defensible space.

Land Intensive Agriculture Zoning District

Accessory dwelling units are allowed by the base zoning district, Land Intensive Agriculture (LIA). With the proposed removal of the Z combining district, an accessory dwelling unit would be a permitted use subject to compliance with Zoning Code Sec. 26-88-060, LIA zoning development standards, building, well, and septic requirements. An ADU is evaluated ministerially for compliance with all applicable development standards when a building permit application is submitted and does not require a separate planning permit. ADUs and Junior



ADUs do not count towards the site's density limits. Rezoning to remove the Z combining district allows the property owner to apply to construct an ADU in a zone where an ADU is otherwise permitted.

Spot Zoning

The County of Sonoma has implemented a comprehensive land use plan through its Zoning Ordinance. Spot zoning is generally considered undesirable but refers to the primary base zone, rather than to combining districts. The subject property was compared to adjoining properties to determine the overall pattern of zoning designations. Surrounding parcels with the Z combining district would have the same opportunity to apply for removal of the Z combining district and would be evaluated using the same generally applicable zoning code standards. Therefore, the subject property would not be granted zoning that is either more restrictive or less restrictive than zoning which is available to the surrounding properties, and spot zoning would not occur.

Environmental Analysis

1. The project is exempt from CEQA pursuant to:
 - a. CEQA Guidelines Section 15305, Minor Alterations in Land Use Limitations, because the proposed zone change would not result in any changes in land use or density and is proposed on a site with an average slope of less than 20 percent; and
 - b. Public Resources Code section 21080.17 and CEQA Guidelines Section 15282(h), which provide a statutory exemption for adoption of an ordinance by a city or county to implement the provisions of Government Code section 65852.2, regarding permitting of accessory dwelling units. The proposed rezoning would provide for the creation of an accessory dwelling unit in an area zoned to allow residential development.
 - c. No exceptions listed under Section 15300.2 apply.

NEIGHBORHOOD/PUBLIC COMMENTS

Early neighborhood notification was sent to properties within 1,000-feet of the subject parcel and no public comments were received.

RECOMMENDATIONS

Staff Recommendation

Staff recommends that the Planning Commission adopt the attached resolution finding the project exempt from CEQA and recommending that the Board of Supervisors approve the requested zone change removing the Z combining district.

ATTACHMENTS

1. ZCE22-0008 Planning Commission Resolution
2. ZCE22-0008 Draft Board of Supervisors Ordinance
3. ZCE22-0008 Project Proposal Statement
4. ZCE22-0008 Vicinity Map
5. ZCE23-0008 Parcel Map
6. ZCE23-0008 Site Plan



Sonoma County Permit and Resource Management Department
2550 Ventura Avenue Santa Rosa CA 95403-2859 (707) 565-1900
www.PermitSonoma.org

