

From: [Cecily Condon](#)
To: [Katerina Mahdavi](#)
Cc: [Ross Markey](#); [Katrina Braehmer](#)
Subject: FW: Special Events BOS agenda Dec. 9, 2025
Date: Monday, December 8, 2025 9:15:47 AM

Cecily Condon

Deputy Director, Planning

Permit Sonoma

Cecily.Condon@SonomaCounty.gov

From: Eric Koenigshofer <ejklaw@yahoo.com>
Sent: Monday, December 8, 2025 8:57 AM
To: Scott Orr <Scott.Orr@sonomacounty.gov>; Cecily Condon <Cecily.Condon@sonomacounty.gov>
Cc: Eric Koenigshofer <ejklaw@yahoo.com>
Subject: Fwd: Special Events BOS agenda Dec. 9, 2025

EXTERNAL

Good morning Scott and Cecily,

In order that you are aware of my communication to the BOS re: the events issue set for board consideration tomorrow, I forward this email which I submitted earlier this morning.

Regards,

Eric

Begin forwarded message:

From: Eric Koenigshofer <ejklaw@yahoo.com>
Subject: Special Events BOS agenda Dec. 9, 2025
Date: December 8, 2025 at 1:41:24 AM PST
To: rebecca.hermosillo@sonomacounty.gov,
David.Rabbitt@sonomacounty.gov, district3@sonomacounty.gov,
district4@sonomacounty.gov, district5@sonomacounty.gov
Cc: Tracy Lyons <Tracy.Lyons@sonomacounty.gov>, katie.mason@sonomacounty.gov, Eric Koenigshofer <ejklaw@yahoo.com>

Dear Chair Hopkins and members of the Board,

When I reviewed the staff Summary Report for your Dec. 9, 2025, agenda item 64, titled, *Periodic Special (formerly cultural) Events Zoning Code Update*, I took note that the Planning Commission vote is mentioned but nothing is said about the discussion leading to the 3 YES/2 NO outcome. In the absence of any mention of the details of the discussion or points of disagreement with the proposal leading to the vote, I offer my observations and position below. I hope this explanation of my NO vote is useful as you consider the item before you. (Two commissioners voted against recommending the proposal now before your board, myself in Dist. 5 and Commissioner Freeman in Dist. 1. This correspondence presents my views and I make no representation as to the views of Commissioner Freeman).

Use Permits should be required for Large Special Events: With this aspect I agree.

The Summary Report sets out the issue on page one, paragraph 2, of the section titled Executive Summary, mid-way in that paragraph we find this statement:

"Recent applications for recurring events that attract a high number of attendees have 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."

Threshold for Ministerial Zoning Permit too high: In the Summary Report dated 12/9/2025, staff proposes that a Ministerial Zoning Permit is appropriate for events up to 2,500 attendees. Events exceeding 2,500 attendees will require a Use permit. I believe a Ministerial Permit threshold of up to 2,500 attendees is too high.

The recommended threshold of 2,500 people is further framed on page 3 of the September 4, 2025, staff report to the Planning Commission (in your agenda packet) which states:

“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 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 and traffic.”

Staff analysis reports that of the 85 events in the set, the smallest event was 28 people and the largest 5,000 people. The average (or Mean) of this full set is 760 people and the Median is 300 per event.

Staff acknowledges the need to *“...conduct site-specific analysis during the permitting process to evaluate potential impacts of larger events, such as noise and traffic.”* I fully agree with the need to *"evaluate potential impacts of larger events"* but I disagree with the definition of “larger events” being events greater than 2,500 people. The threshold should be lower than 2,500 people. (Further discussed below)

Threshold for Ministerial Permit should be lower than 2,500 people:

The numbers cited by staff suggest a lower threshold when one considers an average event size of 760 people or a median of 300 (see Sept. 4, 2025 Staff Report, pg 3 “Cap on Attendees”). The issue here is how to define “larger events” and 2,500 people as the threshold is arbitrary, too high, and not tied to site-specific criteria where potential impacts are likely to emerge such as zoning category compatibility, parcel size, parking capacity, traffic impact, fire risk level, emergency evacuation capacity, noise, other conflicting uses or events, etc. The threshold between Ministerial Zoning Permits and Use Permits should be carefully set based on the likelihood that issues may be present which need to be

subjected to Use Permit analysis and conditioning.

Whichever threshold you adopt “applies in all zoning districts”. If the definition of “larger event” is 2,500 people the outcome is likely to be harsh in some more densely developed areas such as Rural Residential (RR), Ag and Residential (AR), Diverse Ag (DA), etc. With that in mind, a tiered approach based on a more detailed analysis of the size and nature of events in context would be on more solid ground. A tiered approach would be more sensitive to variations between zoning districts and parcel sizes. For example, a Ministerial Zoning Permit for an event on a 5 or 10 acre parcel zoned Agriculture Residential (AR) is quite different from a Ministerial Zoning Permit on a 300 acre parcel zoned Resource and Rural Development (RRD). Recognizing this fact suggests defining “larger event” mindful of such differences which may result in the threshold in more dense zoning districts being lower, perhaps 150 or 250 people, and in areas of larger parcel acreages a threshold of 1,000 or even 2,500 may be appropriate before a Use Permit is required. Relatively simple further research would provide insight to the appropriate thresholds.

This interim action is likely to be in effect for a number of years and should reflect caution in the setting of the threshold for Ministerial Zoning Permits. There was no apparent analysis of the context in which this rather rough approach is to be applied. By that I mean evaluation of zoning category, parcel size, traffic impacts on roads serving a site, fire risk level, fire evacuation capacity, conflicting uses in the vicinity, other events in the vicinity, or any other site specific considerations which are standard issues considered in the Use Permit context. Adopting a threshold of 2,500 attendees before a Use Permit process is required assumes none of the issues merit analysis. This is risky. One size does not fit all.

Waiting for the General Plan Update is too distant on the horizon:

The General Plan update is on the distant horizon and even

optimistic estimates have the final update a couple years out. The Periodic Special Events issue warrants comprehensive treatment before the General Plan update. Given this fact, it seems wise to spend a little more time refining the approach and taking care to avoid triggering complications likely to occur if the threshold is set at the proposed level.

Other issues:

There are several other concerns but the threshold is my chief objection. One additional issue worth a note is how these permits are noticed to the public. The “courtesy notice” coming after the permit is issued seems likely to antagonize persons impacted by very large events where impacts were overlooked due to issuance of a Ministerial Zoning Permit based on such a proposed high threshold for Use Permit review and mitigation.

Requested Action:

My request is simple. Please refer this matter back to staff for further analysis of the threshold within which a Ministerial Zoning Permit is appropriate for Periodic Special Events. Analyze the context of various zoning districts, parcel sizes, and potential impacts as explained above and seek to discover more closely tailored thresholds.

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