

**Objective Design Standards  
for Housing (ORD24-0007)  
Public Comments**

**November 3, 2025**

**SONOMA COUNTY PLANNING COMMISSION**

Re: Item #1, November 6, 2025, Objective Design Standards

Dear Commissioners,

My comment on this item relates solely to the *next* phase of Permit Sonoma's effort to implement objective design standards for housing development projects. The staff report explains that this next phase will develop standards for proposals to build a single-family home with an accessory dwelling unit in the County's designated scenic areas. Staff says that such projects fall within the definition of "housing development project" in the state Housing Accountability Act and that development of objective standards will include addressing "community specific context." Given the wide variety of communities and visual settings in the County's designated scenic resource areas, this will be a challenging undertaking. I ask the Commission to consider two recommendations for this next phase.

First, make sure that you really have a statutory obligation to do this. The Housing Accountability Act applies to projects to develop housing "units," plural. However, state law and the county code treat an SFD+ADU as one unit, singular, for the purposes of zoning density. Further confusing the issue, HCD's *Updated Streamlined Ministerial Approval Process Guidelines* (dated March 30, 2021) defines a multi-family project as two or more attached units, not including ADUs unless the project is for SFD with an attached ADU. It appears that considering an SFD and an ADU to be development of "units" may be a matter of interpretation. I urge the Commission to ask staff to seek clarification on this matter from HCD.

Second, if you do have to do this, I urge the Commission to direct staff to provide a more inclusive process for the development of any objective standards that would apply in the County's rural scenic areas. Specifically, that process should include residents in those areas, not simply developers and design professionals. Many neighborhoods and established

developments throughout the county have homeowner's associations or architectural review committees that are keenly interested in design issues. While these community-based organizations do not have any formal role in the County's permitting process, they should be included in the County's outreach efforts for this next phase.

SINCERELY,

PETE PARKINSON, AICP  
SANTA ROSA, DISTRICT 1

**From:** [Tamara Boulton](#)  
**To:** [PlanningAgency](#)  
**Subject:** Objective Design & Development Standards Workshop COMMENTS, Agenda 9/19/2024  
**Date:** Thursday, September 19, 2024 9:59:35 AM

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EXTERNAL

Dear Commissioners,

I am writing as a long-time rural resident and active member of the Bennett Valley area. I would appreciate your serious consideration and attention to issues raised by Mr. Pete Parkinson, who so thoroughly expressed and detailed serious concerns about this document as it relates to the Objective Design and Development Standards for single-family residential development in the Scenic Resource zone.

1. No documenting information is given for the declaration that subjective standards in the County's LADG are not enforceable on SFDs.
2. SFD with ADU - A SFD with an ADU has never been considered 2(two) units and should not be treated by different standards than a SFD. This would only "muddy the waters" in regard to regulations and create vast discrepancies and unfairness.
3. It is inaccurate to apply "objective standards only" rule to SFDs and is contrary to the Housing Accountability Act. A SFD is not a "housing development with needed density reduction." No to ODDS in the case of SFDs.
4. This proposed change appears to unfairly favor architects and builders while ignoring the negative impacts on the purpose of the SR designation and on the interests of rural communities, neighbors, etc..
5. Eliminating ADR, as this appears to propose is wrong and contrary to years of work and support by the county as well as rural residents. Shifting design issues to building permit review instead of qualified design review does not bode well for consistency, accuracy, and/or fairness.
6. Where was involvement of the neighborhoods and rural residents to this proposed document. It would appear that only developers and designers were involved but none of the neighborhoods in the SLU and SR zones that would be affected (negatively) by this proposed document.

As a longtime and active resident of Bennett Valley I am greatly disturbed by this omission of the negative impacts these standards appear to be creating. While I'm not a "credentialed planner" I have had, over the years, experience working with quality county planners etc. and was, early on, appointed by my County Supervisor to the Advisory Committee that worked with the County in developing the original Bennett Valley Specific/Area Plan. Over the years I've remained interested and active in the Bennett Valley community and worked with numerous county planners in support of the Area Plan. I was also appointed to serve on the General Plan Update Committee back in 2001 and happily served with various other district appointees - so I do have some experience and much interest in the planning process.

Please do not send this document forth in the current form and with current text. There's much work to be done to correct the inconsistencies and inaccuracies as well as the negative impacts it has on SFDs, SRs, SLUs and Area Plans.

I am so thankful that Pete Parkinson wrote such a thorough letter regarding the issues he sees with the proposed standards and providing his educated and historic perspective.

Thank you, in advance, for your consideration.

Sincerely,  
Tamara Boulton

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do not click any web links, attachments, and never give out your user ID or password.

September 17, 2024

Planning Commission  
County of Sonoma  
2550 Ventura Avenue  
Santa Rosa CA 95403

Re: Comments on Objective Design and Development Standards Workshop, Agenda  
9/19/2024

Dear Commissioners,

I write as a retired professional planner with decades of experience in three counties (including 12 years as director of PRMD) and as a resident of unincorporated Sonoma County. My neighborhood is in Bennett Valley, located in a Scenic Landscape Unit, Scenic Resource (SR) zoning and subject to the Bennett Valley Area plan. My comments pertain only to the proposal to develop Objective Design and Development standards (ODDS) for single-family residential development in the SR zone. Please consider the following comments:

- The staff report implies that subjective standards are not allowed, period. See page 13: "Subjective standards in the County's Local Area Development Guidelines are not enforceable under the Housing Accountability Act." This may be true for multi-family projects, but staff should cite actual state law pertaining to single family development. HCD's technical guidance appears to apply such requirements only to projects of 2+ units.
- The staff report notes that the new rules would consider an SFD with an ADU to be 2 units and therefore subject to different standards than an SFD. This is contrary to every other land use regulation in state and county codes, which clearly state that an SFD with an ADU is to be treated as a single residential unit. Bifurcating the regulatory structure like this invites confusion and manipulation.
- Applying an "objective standards only" rule to single family development does not follow the logic of the Housing Accountability Act (HAA). The HAA supports housing development by constraining decisions that result in denying or reducing density of

a housing development. Of course, it is not possible to reduce the density of an SFD, nor do I recall ever seeing an SFD denied via the County's Administrative Design Review process. The shift to ODDS is not needed for SFD projects.

- The proposed change is touted as a time saver for SFD projects. A neighbor down the street who's building a house on a burned lot has waited 11 weeks for Plan Check. Eliminating ADR for SFDs in the designated scenic areas will not fix this problem.
- The intent of this change seems to be geared toward giving builders and architects an easier time in the permit process because an SFD "can be expected to have fewer impacts than a larger development." (See first full paragraph on page 9 of the staff report). I strongly support permit streamlining wherever possible, but this proposal short-changes the purpose of the SR and the interests of neighbors and rural communities.
- Staff proposes to implement the ODDS for SFDs at the building permit stage and eliminate ADR for conforming projects. After the 2017 fires, the Board adopted a new code that required the PRMD director to develop "ministerial" design standards and provides that fire rebuild projects in the SR that comply with those standards are exempt from ADR. That was reasonable under the circumstances. This streamlined process benefited me, personally, and helped our neighborhood get back on its feet. But as time has gone by, two problems are apparent: 1) the "ministerial standards" contain plenty of subjective and discretionary language; and 2) staff does not appear to be implementing those standards consistently or even reviewing design issues at all in some cases. There are several rebuilds in our neighborhood that clearly do not comply with the standards, and online permit records show nothing whatsoever about design. Obviously, this does not inspire confidence in a process that shifts design issues to the building permit review process.
- The report shows that staff have engaged the developer & design communities but there has been no engagement with SR neighborhoods. This does not serve the public interest that is intended to be protected by SLUs and SR zoning (not to mention area plans). There are many private architectural review committees and neighborhood associations in the County's designated scenic areas. We have an Architectural Review Committee here in my neighborhood that makes regular efforts to engage with Permit Sonoma staff. The staff should have tried to reach out to those important stakeholders.

Lastly, I note that the staff report provides no specific information on what the ODDS might ultimately contain. An "early draft" is mentioned, but not provided. The standards themselves may address some concerns or may intensify them. Certainly, if the

“ministerial” standards adopted after the 2017 fires are any indication, we will have an even larger problem.

To sum up, the need to develop ODDS for SFDs in the scenic resource areas has not been demonstrated, implementation of the County’s “ministerial” design standards on fire rebuilds has been problematic, and the neighborhood and community stakeholders have not been engaged. If the County is going to press ahead with this initiative as to SFDs, all these shortcomings need to be addressed.

Thank you,

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Pete Parkinson, AICP  
Santa Rosa

**From:** [Sonia Taylor](#)  
**To:** [Katrina Braehmer](#); [Wil Lyons](#)  
**Cc:** [Ross Markey](#)  
**Subject:** Re: 9/19 PC Workshop on Objective Standards  
**Date:** Thursday, September 12, 2024 8:58:14 PM

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EXTERNAL

Thanks so much for letting me know.

I fully support this effort, for all the reasons listed in the Staff Report. In particular, I am very interested in development of objective development standards, particularly surrounding wildfire related issues including (but hardly limited to) fire safe roads, ability of the County to do fire suppression, and ability of new and existing residents, employees, etc. to evacuate safely. Unfortunately, HCD has been promising guidance on this topic for over a year now, and as yet there is nothing available.

One note: At page 5 of the Staff Report you reference SB 35. SB 35 is dead, and was replaced by SB 423. Although I attempted to get substantive changes to SB 423 with regard to building by right housing in fire hazard, I was unsuccessful, and I expect that when the County is subject to SB 423, it will be a very real problem, which is why I am very interested in objective development standards around areas of the County in wildfire hazard/risk.

Objective design standards are very important, but objective development standards are going to have to substitute for CEQA, which will no longer be permitted under SB 423 and all state laws tiering off of SB 423 (and there are a lot of them). CEQA, of course, would allow the County to consider a new proposed housing development and determine such things as whether the County has the ability to provide fire protection/suppression, and whether the new residents would be able to safely evacuate. With the elimination CEQA as a tool, it is critical that those considerations be contained within objective development standards to save lives and property.

While there may still be the ability for the County to deny a project based on health and safety considerations, that is not really entirely clear, and I believe it would be best to develop objective development standards that would prevent putting housing in fire hazard/risk.

For example, although 44% of built to Chapter 7A building codes survived the Paradise fire, 56% of those Chapter 7A compliant homes BURNED. Happy to provide that report at your request. We cannot make homes fire safe, only more resilient, and that means that everyone's still going to have to evacuate in an emergency.

Unfortunately, the Staff Report doesn't appear to be attempting to develop objective development standards, or even design standards that address the many wildfire hazards/risks facing Sonoma County.

Will you be attempting to put forward objective development standards that consider our wildfire hazards/risks? I hope so. I think the last

thing anyone wants to do is build more housing -- particularly housing for our most vulnerable communities -- in fire danger.

Thanks for your consideration. Happy to talk about this if you'd like. Please don't hesitate to call.

Sonia

Sonia Taylor  
707-579-8875  
great6@sonic.net

On 9/12/2024 10:23 AM, Katrina Braehmer wrote:

> Hi Sonia,  
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> We appreciate your interest in the ODDS project. The staff report for the item is now online.  
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> Thanks for your patience,  
> Katrina  
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> Sent: Thursday, September 12, 2024 9:07 AM  
> To: Wil Lyons <Wil.Lyons@sonoma-county.org>  
> Cc: Ross Markey <Ross.Markey@sonoma-county.org>; Katrina Braehmer <Katrina.Braehmer@sonoma-county.org>  
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>> The staff report for next week's hearing should go live in the next few days. Please be sure to stay tuned once that's posted for the latest and greatest information.  
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>> Have a great week.  
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>> Are you a State of California Licensed Architect or Landscape Architect that lives in Sonoma County? Would you be interested in serving your community as a member of Sonoma County's Design Review Committee? Please let me know!  
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>> Have Planning Questions? Please review our new Planning and Zoning  
>> FAQs Page!  
>> [https://urldefense.com/v3/\\_https://permitsonoma.org/divisions/plannin](https://urldefense.com/v3/_https://permitsonoma.org/divisions/plannin)  
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>> Warning: If you don't know this email sender or the email is unexpected, do not click any web links, attachments, and never give out your user ID or password.  
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