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Sonoma County Planning Commission  
**STAFF REPORT**

**FILE:** ZCE24-0013  
**DATE:** January 15, 2026  
**TIME:** At or after 1:05 PM  
**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:** Jonathan Frommer & Jessica Nall  
**Applicant:** Jonathan Frommer & Jessica Nall  
**Address:** 711 Lytton Station Rd, Geyserville CA  
**Supervisory District(s):** District 4  
**APN:** 091-081-065  
**Description:** Request for a zone change to remove the Z (Accessory Dwelling Unit Exclusion) Combining District on a 5.09-acre parcel zoned RR B6 5 Z, F2.  
**CEQA Review:** Categorical Exemption: CEQA Guidelines Section 15305  
**General Plan Land Use:** RR 5 (Rural Residential, 5-acres per dwelling unit density)  
**Specific/Area Plan Land Use:** Not Applicable  
**Ordinance Reference:** Sec. 26-08-010 – 030 – Residential Zones  
Sec. 26-76-005 – Accessory Dwelling Unit Exclusion Combining District  
Sec. 26-88-060 – Accessory Dwelling Units  
Sec. 26-58-030 – F2 Floodplain Combining District  
**Zoning:** RR (Rural Residential) B6 5 (5-acres per dwelling unit density), Combining District for Z (Accessory Dwelling Unit Exclusion), and F2 (Floodplain)



## **Recommendation**

Permit Sonoma recommends that the Planning Commission adopt a resolution recommending that the Board of Supervisors adopt an ordinance to approve a Zone Change to remove the Z (Accessory Dwelling Unit Exclusion) Combining District from the subject parcel 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.

## **EXECUTIVE SUMMARY**

The landowner requests approval of a zone change to remove the Z (Accessory Dwelling Unit Exclusion) Combining District on a parcel 5.09-acres in size, to allow for the use of future accessory dwelling units on the subject property. The Z Combining District was applied to the subject parcel as part of planning Conditions of Approval for a previous Major Subdivision, project file ZC/MJS89-694, also known as the ‘Big Plains Estate subdivision’. The subject parcel is considered Lot 2 of the ‘Big Plains Estate Subdivision’. This major subdivision was approved by a Board of Supervisor Resolution 1990-2280, for two phases with the condition of approval (not CEQA mitigation measure) that the newly created parcels be subject to a Conservation and Scenic Easement, for the purpose of protecting the nature and character of the subject property from further subdivision and residential development. However, the preservation of scenic areas is not part of the criteria for placement of the Z district on parcels, therefore removal of the Z district from the subject property can be considered.

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 due to Major Subdivision Conditions of Approval, 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 parcel.

## **PROJECT SITE AND CONTEXT**

### ***Background***

In 1989, the Planning Commission reviewed the Negative Declaration for a zone change and major subdivision file ZC/MJS89-694 and determined the project was not physically suitable for the development due to the potential for flooding on-site and the nearby Lytton Station Road. The Planning Commission determined that the project would cause some conflicts between agricultural and residential uses. By adoption of Resolution 89-194, the Planning Commission recommended to the Board of Supervisors to deny the applicant’s request because of the noted flooding concerns. However, on January 9<sup>th</sup>, 1990, the Board of Supervisors determined that the proposed rezoning and major subdivision, as conditioned, would have no substantial adverse effect on the environment. The “Big Plains Estate Subdivision”, ZC/MJS89-694, was approved by the Board of Supervisors under resolution No.90-0117, ultimately creating the subject parcel. Relevant Conditions of Approval from the major subdivision included Planning Conditions of Approval #14, “Prior to recording the Final Map, the applicant shall enter into a scenic easement for the purpose of precluding further subdivision and excluding second units”,



and #15, "Prior to recording the Final Map, the applicant shall apply for a rezoning to the 'Z' (second unit exclusion) district."

All subsequent parcels were required to enter into a scenic easement for the purpose of precluding future subdivisions and exclusion of secondary units. This scenic easement, recorded February 1990, was made in agreement with the property owners as Grantors and the County of Sonoma as Grantee. Condition #3 of the Scenic Easement states that "The grantors, their successors and assigns, shall develop the subject property with only one residence per lot. Development of accessory structures to serve the primary use shall be permitted."

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."

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In 2019 the County adopted Ordinance No. 6285, which promoted the production of affordable housing units by removing 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, traffic, and Land Conservation Contracts. However, the subject parcel did not pass the countywide Z Combining District removal screening criteria in 2019 due to Major Subdivision Condition of Approval #14, "Prior to recording the Final Map, the applicant shall enter into a scenic easement for the purpose of precluding further subdivision and excluding second units."

An updated Housing Element was adopted by the County Board of Supervisors on August 22, 2023, and certified by the California Department of Housing and Community Development on October 26, 2023. The County prepared the 2023-2031 Housing Element to affirmatively further fair housing and to accommodate the County's 3,824-unit Regional Housing Needs Allocation (RHNA) for the 2023-2031 Housing Element period. In addition to responding to all of the new statutory requirements, the Housing Element demonstrates how its identified local housing needs will be met through new and revised policies and programs.

Removing the Z Combining District on a case-by-case basis continues to promote the production of affordable housing units by creating opportunities for landowners to apply for ADUs. The number of ADUs built in the county has increased since 2016 legislation that reduced barriers for development of these accessory units.

### ***Site Characteristics***

The property located at 711 Lytton Station Road (APN 091-081-065) is approximately 5.09 acres in size. The site is located approximately 1 mile north of the City of Healdsburg city limits. The parcel is currently developed with a 1,340-square-foot single-family dwelling, and 1,500-square-foot detached garage.

### ***Area Context and Surrounding Land Uses***

The project site is surrounded by agricultural and residential land uses, with parcels ranging from 4 to 137 acres in size. Adjacent parcels along Lytton Station Rd are developed with single family dwellings, however others are developed and maintained as agricultural land. Zoning in this area includes a combination of



properties zoned LIA (Land Intensive Agriculture), RR (Rural Residential), DA (Diverse Agriculture), and AR (Agriculture and Residential).

Direction	Land Uses
North	Agricultural Uses and Low Density Residential
South	Agricultural Uses and Low Density Residential
East	Agricultural Uses
West	Agricultural Uses

**Significant Applications Nearby**

No significant applications nearby.

**Access**

The 5.09-acre parcel (APN: 091-081-065) is accessed via Lytton Station Road, a county-maintained public road.

**Wildfire Risk**

The subject parcel is not located within a Fire Hazard Severity Zone.

**Water/Wastewater/Utilities**

The subject parcel is located in a Class 1 Groundwater Availability Area (Major Groundwater Basin) with water provided by an existing well. The subject property also has an existing septic system on site.

**Agricultural Conditions/Land Encumbrances/Contracts**

The parcel is not subject to any agricultural conditions, land encumbrances, or Land Conservation Contracts. Of the 5.09-acre parcel, approximately 4 acres is planted in vineyard. The parcel does not meet the required thresholds to allow for an agricultural employee dwelling unit.

**Other Environmental Conditions**

None noted.

**PROJECT DESCRIPTION**

A Zone Change request to remove the Z (Accessory Dwelling Unit Exclusion) Combining District from the 5.09-acre parcel to allow for the potential development of accessory dwelling units and find the project exempt from the California Environmental Quality Act (CEQA).

**Ordinance and Project History**

Table 1- Ordinance History

Date	Ordinance History
Jan. 9, 1990	The parcel was rezoned to Rural Residential per the Board of Supervisors decision Reso No. 90-0117 adopting a negative declaration and approving the request to rezone 30.5 acres from the A1 (Primary Agriculture) and RR (Rural Residential, B3, Districts to the RR, B6, 5 Acre Density or other appropriate districts and granting the request for a subdivision of the site into 6 lots.
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



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Date	Ordinance History
	regulatory barriers for constructing new accessory dwelling units in accordance with amendments to Gov. Code § 65852.2
<b>Sep. 17, 2019</b>	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.
<b>Sep. 14, 2021</b>	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.
<b>Dec. 5, 2023</b>	The Board of Supervisors adopted Ordinance No. 6458, amending the Accessory Dwelling Unit and Junior Accessory Dwelling Unit Ordinance to implement the 2023-2031 Housing Element and ensure consistency with state law.

Table 2- Project History/Milestones

Date	Project Event/Milestone
<b>Dec. 9, 2024</b>	Zone Change application submitted to Permit Sonoma
	ZCE24-0013 was deemed complete for processing.
<b>Dec. 12, 2024</b>	
<b>Dec. 19, 2025</b>	Public notice for Planning Commission hearing

## **ANALYSIS**

### ***General Plan Consistency***

Permitting Accessory Dwelling Units (ADUs) on qualifying properties is consistent with the 2023-2031 General Plan Housing Element goals and objectives to increase opportunities for the production of affordable housing. Policy HE-3a seeks to “eliminate unnecessary regulatory constraints to the production of affordable housing, including infill housing” and Policy HE-6e seeks to “provide housing opportunities throughout the county for all household income cohorts while avoiding or mitigating displacement of existing residents.” Surveys conducted by the County in 2006, 2013, and 2019, found that a majority of ADUs are offered at below-market rates that are affordable to moderate income households. The California Department of Housing and Community Development consider ADUs as an innovative, affordable, and effective options for adding housing.

Since 2005, the County has been accepting and approving requests to remove the Z overlay on a case-by-case basis. In 2019, the County adopted Ordinance No. 6285, which promoted the production of affordable housing units by removing 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 certain screening criteria.

The County of Sonoma has historically used the Z Combining District 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 do not apply and where 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 each 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:

- 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 do not apply to the subject parcel as discussed 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. Prior to issuance of a building permit to construct an accessory dwelling unit, the project would need to meet the standards for new development in a Class 1 Groundwater Availability 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 recognizes that building permits necessary for construction of Accessory Dwelling Units would require proof of septic capacity at that stage.
- 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 Lytton Station Road, with adequate ingress and egress to the site via a driveway which exits directly onto Lytton Station Road. The addition of accessory dwelling units 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 consists of flat topography, with approximately 3.4 acres planted in agriculture, and one single-family dwelling located at the front of the parcel. Access is provided off a driveway which connects directly to Lytton Station Road able to provide effective emergency vehicle access. The subject property is not within the Fire Hazard Severity Zone. The addition of ADUs is not anticipated to substantially increase fire risk on the property as the property is relatively flat and surrounded by agriculture, 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.

#### Rural Residential Zoning District

Accessory dwelling units are allowed by the base zoning district, Rural Residential (RR). 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. 26-08-030, RR zoning development standards, building, well, and septic requirements. An



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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 overlay allows the property owner to apply to construct ADUs in a zone where ADUs are otherwise permitted.

#### Maximum Lot Coverage

RR-zoned parcels are limited to a maximum of 35% lot coverage, as required in Section 26-08-040 of the Sonoma County Code.

The subject property is approximately 5.09-acres in size and has an existing single-family dwelling approximately 1,340 square feet in size, and one detached garage 1,500 square feet in size. The maximum allowable size for a new ADU is 1,200 square feet; therefore, the addition of an ADU to the property would not exceed the maximum lot coverage allowed for the site (77,602 sq ft/1.78 acres at 35%).

#### 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 Zones. 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. 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***

Staff find 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.

#### **NEIGHBORHOOD/PUBLIC COMMENTS**

At the time of completion of this staff report, no public comments have been received for this application.

#### **RECOMMENDATION**

Staff recommends that the Planning Commission adopt the attached resolution finding the project exempt from CEQA and recommending that the Board of Supervisors adopt an ordinance approving the requested zone change to remove the Z combining district from the subject property.

#### **ATTACHMENTS**

1. ZCE24-0013 Planning Commission Resolution
2. ZCE24-0013 Draft Board of Supervisors Ordinance



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3. ZCE24-0013 Project Proposal Statement
4. ZCE24-0013 Vicinity Map
5. ZCE24-0013 Accessors Parcel Map
6. ZCE24-0013 Project Site Plan



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