

## **ATTACHMENT 10**

**PUBLIC COMMENT RECEIVED UP TO  
9AM 8/15/19**



## ALEXANDER VALLEY ASSOCIATION

Sonoma County Board of Supervisors  
c/o Doug Bush, PRMD  
2550 Ventura Avenue,  
Santa Rosa, CA 95403  
Re: ZCE18-0001

August 8, 2019

Dear Board of Supervisors,

I am writing this letter on behalf of the Alexander Valley Association Board. We have reviewed Information regarding the removal of the Z, Accessory Dwelling Unit Exclusion, in DA, LIA, and LEA zones. The AVA board supports this project, but would like to share some concerns with the Board of Supervisors regarding the potential increase in ADU's within our valley.

The Alexander Valley is predominantly zoned LIA, Land Intensive Agriculture. The mapping tool provided by the county shows many of the smaller parcels in Alexander Valley as potential sites of ADU's. Given the popularity of this area, we would like to ensure that Alexander Valley does not become overrun with ADU's being misused as short term rentals

Our first concern is with the enforcement of the use of the ADU's for long term rentals. Currently ADU's are allowed by state statute ( Cal Govt Code sec 65852.2(a)(6)) to be used for rentals longer than 30 days. The Alexander Valley Board would like to see the county require a minimum length of rental of at least 6 months to insure these rentals help with the county housing shortage and they are not being used as long term vacation rentals.

Our second concern is with the process for enforcement of restrictions on ADU's. The AVA would like to work with the county to establish an oversight process, so that neighbors aren't responsible for filing a complaint about permit misuse against their neighbors. In addition, we hope reviews of individual permit applications will include the density of ADU's in the proposed area, and well & septic requirements in the DA, LIA and LEA areas.

The Alexander Valley Association's main concern is that given the interest in our valley as a tourist destination, it is highly likely there will be some ongoing abuse of the new ADU's as unlicensed vacation rentals. We would appreciate anything the Board of Supervisors can do to reduce the likelihood of this occurring. Again, we support the use of ADU's as additional long term housing in our valley and appreciate the opportunity this project provides.

*Melinda C Barnard*

Melinda Barnard, AVA Board Member

Cc:, Ariel Kelley, Supervisor James Gore

**From:** [Eric Gage](#) on behalf of [Planner](#)  
**To:** [Doug Bush](#)  
**Subject:** FW: ADU Ordinance -- Item 28 on Tomorrow's Agenda  
**Date:** Tuesday, August 13, 2019 9:02:32 AM

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Doug this might be for your file.

Sincerely,

Eric Gage  
Planner III  
Direct: 707-565-1391

OFFICE HOURS: Permit Sonoma's public lobby is open Monday through Friday from 8:00 AM to 4:00 PM, except Wednesdays, open from 10:30 AM to 4:00 PM.

-----Original Message-----

From: Steve Birdlebough [<mailto:scbaffirm@gmail.com>]  
Sent: Monday, August 12, 2019 4:46 PM  
To: Susan Gorin <[Susan.Gorin@sonoma-county.org](mailto:Susan.Gorin@sonoma-county.org)>  
Cc: David Rabbitt <[David.Rabbitt@sonoma-county.org](mailto:David.Rabbitt@sonoma-county.org)>; Shirlee Zane <[Shirlee.Zane@sonoma-county.org](mailto:Shirlee.Zane@sonoma-county.org)>; district4 <[district4@sonoma-county.org](mailto:district4@sonoma-county.org)>; Lynda Hopkins <[Lynda.Hopkins@sonoma-county.org](mailto:Lynda.Hopkins@sonoma-county.org)>; PermitSonoma <[PermitSonoma@sonoma-county.org](mailto:PermitSonoma@sonoma-county.org)>  
Subject: ADU Ordinance -- Item 28 on Tomorrow's Agenda

EXTERNAL

Good Afternoon, Susan--

My apologies for failing to weigh in on this earlier; this proposal seemed to surface suddenly.

To allow 1,900 additional large ADUs units in Sonoma County with no restraints on the number of diesel and gasoline-burning vehicles that would descend on the county's roads would be a step in the wrong direction. The staff report suggests that only a few of the permissible ADUs would actually be built. However, several additional vehicles could easily arrive with each unit, and the chances are there would be noticeable traffic and greenhouse gas emission impacts. Nearly every day we hear that many roads are too busy, and in bad repair. I don't see any estimates of greenhouse gas impacts in the staff report, nor estimates of the road maintenance costs, nor how to fund them.

Steve Birdlebough  
707-576-6632

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Santa Rosa Office  
555 Fifth Street, Suite 300 A  
Santa Rosa, CA 95401  
(707) 575-3661

August 5, 2019

To: Sonoma County Board of Supervisors  
Fr: Teri Shore, Regional Director, Greenbelt Alliance

Dear Chair Rabbitt and Board of Supervisors,

Greenbelt Alliance is writing to oppose the removal of Z zoning from as many as close to 2,000 small agricultural parcels across the county as proposed to allow ADUs up to 1,200 square feet in size (size of double wide mobile home) across the county.

Greenbelt Alliance aligns completely with the comments and recommendations of the Community Alliance for Family Farmers and The Farmers Guild, which also oppose the Z Zoning removal as proposed.

We are also quite concerned about the complete lack of notification provided to interested stakeholders and the public that the Z Zoning removal was coming up on the agenda on Tuesday. Greenbelt Alliance made written and oral comments to the Planning Commission on the ADU Z zoning.

We also participated in an hour-long meeting with CAFF with Sup. Lynda Hopkins and Permit Sonoma Comprehensive Planning Manager Jane Riley after the public hearing at the Planning Commission. A number of questions and requests for information were not provided.

The removal of the ADU Z zoning as proposed is a major change of planning policy for the County of Sonoma. We urge you to delay any decisions on this proposal until robust public outreach has been conducted to interested stakeholders and to the community in general in the districts most affected by this change, particularly the 5<sup>th</sup> and 4<sup>th</sup> District. As a first step this should go to all the new MACs for review.

Another major concern is the inadequate review under CEQA. Staff indicates that this was somehow addressed under the last Housing Element CEQA review. So I tried to follow that back and realized that the last Housing Element tiered off the previous CEQA review dating back to the previous Housing Element and the 2008 General Plan EIR. None of these CEQA reviews ever analyzed the environmental impacts of this action. The Housing Element suggests reviewing or considering this change, but it has clearly never been analyzed specifically. So this action is dependent on a 10-year-old General Plan EIR that never considered the impacts of this specific action and when many significant changes have occurred in Sonoma County such as the wildfires, increased GHGs and VMTs, groundwater sustainability priorities, drought, and other environmental and related issues.

**Bottom line is that this initiative violates longstanding city-centered growth policies, undermines ag zoning, and will not provide any affordable housing as it has zero requirements for affordability restrictions or standards.**

Due the lack of public notice, we are unable to generate a detailed new comment letter, but below are our comments to the Planning Commission and our follow-up email to Permit Sonoma and Sup. Hopkins.

## GREENBELT ALLIANCE PLANNING COMMISSION COMMENTS ON Z ZONING REMOVAL

*April 29, 2019*

*The proposed removal of the Z (Accessory Dwelling Unit Exclusion) Combining District Removal has the potential to provide affordable housing for people who work on agricultural properties across the county.*

*However, it also has the potential to increase the number of people in Sonoma County who live in rural areas that are distant from towns and cities with public services, jobs and schools.*

*Without further environmental analysis, it is likely, though difficult to know for sure, that by removing the Z zoning as proposed, that Vehicle Miles Traveled are likely to increase and work against the county's ongoing desire to reduce greenhouse gas emissions and focus on city-centered growth.*

*Today the county allows ADUs up to 1,200 square feet - which is the size of a double-wide mobile home - that easily accommodate a family of four. If all the identified parcels build the maximum size ADU with the maximum number of people, that would equal up to 5,500 more people on ag lands in rural areas.*

*Clearly, the County of Sonoma is intent on moving this forward, though perhaps it should really be considered as part of the General Plan Update not as a fast-tracked stand-alone ordinance. Doing so would provide rural landowners and the public to weigh in and consider the long-term impacts of this far-reaching change in zoning.*

*In any case, as you move forward to allow more residential development via ADUs in the rural areas, you may want to consider the following:*

- 1. How many of the parcels are in community separators? It looks at first glance that there are some in Sonoma Valley and probably outside of Petaluma and Healdsburg. At the least, please request that staff provide an overlay of the CS, where people voted by 81 percent to prevent increased development.*
- 2. Will these ADUs be limited to farm workers and ag employees or open to anyone?*
- 3. Is there any affordability requirement?*
- 4. Is there any reason they couldn't be used as vacation rentals or air b and bs or hospitality?*
- 5. Will these ADUs be allowed for marketing and other promotional purposes?*
- 6. Will removing the Z zoning then conflict with LAFCO policies that prohibit adding more units and/or rooms to Outside Service Agreements (Cortese-Knox)?*

*Thank you for your consideration.*

## GREENBELT ALLIANCE FOLLOW UP EMAIL TO SUP. HOPKINS AND PERMIT SONOMA

*May 16, 2019*

*Dear Lydna and Jane,*

*Thank you so much for including me in your discussion with Wendy and Evan of CAFF about the proposed removal of Z zoning for ADUs on ag lands up to 20 acres in parcel size to provide "affordable" housing.*

*Greenbelt Alliance shares all of the concerns outlined by CAFF in the meeting, including the need to update farmworker housing policies. In addition, we continue to have significant concerns as described in see the attached summary of Greenbelt Alliance comments and recommendations that I provided in hard copy at the meeting.*

*We appreciate the suggestions made about narrowing the size of the ADUs, increasing affordability, and adding X vacation exclusion zoning.*

*Please also see attached a summary of policies and provisions from the current Housing Element that we compiled with colleagues. There is a wide scope of program and policies available to provide affordable housing across the county; and wanted to make note of the specific reference to Z zoning removal as follows:*

***Policy HE-3c: Review "Z" (Second Dwelling Unit Exclusion)*** *Combining District restrictions on agricultural parcels of less than 10 acres county-wide, and consider removing the restrictions where appropriate. Not in water-scarce areas (Class 3 or 4) or flood prone zones adequate sewage treatment capacity. [Bolding added to make note that the policy is to "review" not that it necessarily be prioritized or implemented and is not a requirement to do so. Please also note reference to 10 acres or less, when the Planning Commission recommended up to 20 acres -- though one commissioner told me privately that we made a mistake with his vote on that but it is too late to change. In any case, the board and Permit Sonoma seem interested in moving forward.]*

### ***INFORMATION REQUESTS***

*In order for us to better understand the proposed Z Zoning removal, please provide the following information:*

- 1. ADU survey and results including number of surveys sent, number received, the actual questions and responses (with private info dedacted of course).*
- 2. Estimates of actual number of ADUs that might qualify to be built based on location and size of parcels per the information you recently shared with one of our colleagues.*
- 3. Housing Element Environmental Impact Report (or link to it).*
- 4. Staff report to Supervisors on Housing Element that discusses and describes the proposed removal of the Z Zoning, if available.*

*Also, I wanted to clarify my response to Lynda's question about how I would view ADU housing on ag land and potential occupancy by a rural worker, such as a firefighter. I said "no" I would not support that because it is not consistent with existing General Plan policy, Housing Element and ag zoning. It is not because I am against housing or firefighters. I am for planning and policy consistency and protecting our ag lands for appropriate uses.*

*If the county wants to provide additional housing in the form of ADUs to the general public on lands zoned specifically for agriculture, then from a planning perspective you are changing its use and reducing the land available for agriculture.*

*Given that the "ADUs" in question are in fact houses up to 1,200 square feet in size, it is indeed a change of use; and if the largest size is not build adjacent to the existing main residence, it creates a de facto subdivision with the need for additional septic, water, electricity, access roads, parking areas and garages, garden, play, area, etc.*

*If there is a dire need to use ag land for affordable housing for the public, other than farmworker or ag employee housing, then perhaps it would be more consistent to rezone the ag land for housing such as rural residential.*

*We would not necessarily support this, given that there is plenty of room in our towns and cities for ADUs and more housing, including more than 16,000 new units in the pipeline in addition to the 5,000 that we lost during the fires.*

*Thank you for your time and consideration.*

*Teri*

Thank you for your consideration. Please let me know if you have any questions or comments. I am unable to attend the public hearing tomorrow and will be on vacation Aug. 14 to Sept. 6 and unavailable.

Teri Shore



Regional Director, North Bay

To: Sonoma County Board of Supervisors  
Attn: Fourth District Supervisor, James Gore

From: Susan Rose and Mary Kelley  
6800 Highway 128  
Healdsburg, CA 95448  
APN 131-170-027  
707.433.5068 707.291.9276  
4valleyoakfarm@gmail.com

Date: August 9, 2019

Re: Exemption to Z overlay on parcels under 20 acres —  
to allow the building of a permitted Accessory Dwelling Unit

Dear Board of Supervisors,

Susan Rose is the owner of the home and land where we live on 3.38 acres off Highway 128 near the Jimtown Store. We request an evaluation of our property to determine the removal of the Z District restriction.

We would like to build an ADU to provide housing for a couple or a small family on our land. We also need help maintaining our established walnut grove of thirty trees, and a fruit orchard with twenty-five varieties of mature fruit trees and table grapes. We are also dedicated to regenerative agriculture and committed to restoring the natural biota under three, centuries-old, Valley Oak trees.

By allowing us to build an ADU, we will be able to provide a home to a small family, and we will look for tenants who can help us maintain the agricultural variety, biological diversity, and the natural beauty of our land.

Sincerely,

Mary Kelley and Susan Rose





North Bay Association of REALTORS®  
475 Aviation Blvd., Ste, 220 | Santa Rosa, CA 95403  
625 Imperial Way, Suite 2 | Napa, CA 94559  
(707) 542-1579 | [northbayrealtors.org](http://northbayrealtors.org)

August 1, 2019

Sonoma County Board of Supervisors  
Supervisor David Rabbitt, Chair, District 2  
575 Administration Drive, Room 100A  
Santa Rosa, CA 95403

**RE: Sonoma County Z Combining District Removal (Accessory Dwelling Units)**

Chairman Rabbitt & Members of the Sonoma County Board of Supervisors,

On behalf of the North Bay Association of REALTORS® (NorBAR), I am writing to share our support for the proposed removal of the Z (Accessory Dwelling Unit Exclusion) Combining District from identified agriculture district parcels and establish new objective standards for review of ADU applications countywide.

Rezoning the proposed parcels to remove the Z Combining District will remove significant barriers for the production of Accessory Dwelling Units (ADUs) while ensuring the application of uniform, ministerial standards. ADUs can help support small farms by providing supplemental income and agricultural worker housing for farming families when their properties do not qualify for other agricultural housing types. Allowing accessory units on agricultural properties may also reduce commute times and associated traffic and pollution by providing rural housing near rural jobs.

This proposal takes significant precautions to ensure the exclusion of high-risk areas and excludes parcels located within high/very high fire hazard severity zones or critical biotic habitat areas for the CTS, where the potential for groundwater contamination is present or groundwater levels would be compromised, and so on.

Finally, jurisdictions throughout California – including our service area of Sonoma, Napa, Mendocino and Lake - have taken great strides to facilitate the creation of ADUs and other forms of affordable, and affordable workforce housing – this proposal aligns with those worthy those efforts and we appreciate your leadership on the local housing crisis.

Thank you for considering our input. Should you have any questions regarding our position, please do not hesitate to contact **Lisa Badenfort, Public Affairs Director, at 707-636-4294, or [lisa@northbayrealtors.org](mailto:lisa@northbayrealtors.org)**.

Respectfully,

Carol A. Lexa, President-Elect  
Local Government Relations Committee, Chair

**The North Bay Association of REALTORS® is a four-county trade association representing over 3,600 real estate professionals and affiliates. We serve as an advocate for housing and homeownership, the preservation of property rights, and a thriving real estate economy. In addition to advocacy, we serve as a collaborator and resource to decision-makers and the public on the persistent quality of life issues facing the North Bay.**

cc:

Supervisor Susan Gorin, District 1  
Supervisor Shirlee Zane, District 3  
Supervisor James Gore, District 4  
Supervisor Lynda Hopkins, District 5  
Tennis Wick, Director, Permit Sonoma (PRMD)  
Jane Riley, Comprehensive Planning Manager, Permit Sonoma (PRMD)  
Doug Bush, Project Planner, Permit Sonoma (PRMD)

**From:** [Chelsea Holup](#)  
**To:** [Doug Bush](#)  
**Subject:** FW: ADUs in Ag Zones  
**Date:** Tuesday, August 13, 2019 8:14:33 AM  
**Attachments:** [ADU in Ag Zones 8-12-19.docx](#)

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-----Original Message-----

From: Andrea Krout  
Sent: August 12, 2019 4:54 PM  
To: Chelsea Holup <[Chelsea.Holup@sonoma-county.org](mailto:Chelsea.Holup@sonoma-county.org)>  
Cc: Kay Lowtrip <[Kay.Lowtrip@sonoma-county.org](mailto:Kay.Lowtrip@sonoma-county.org)>  
Subject: FW: ADUs in Ag Zones

Hi Chelsea,  
This one came to use as well.

Thanks,  
Andrea

-----Original Message-----

From: wendy Krupnick [<mailto:wlk@sonic.net>]  
Sent: Monday, August 12, 2019 8:50 AM  
To: Shirlee Zane <[Shirlee.Zane@sonoma-county.org](mailto:Shirlee.Zane@sonoma-county.org)>; Susan Gorin <[Susan.Gorin@sonoma-county.org](mailto:Susan.Gorin@sonoma-county.org)>; Pat Gilardi <[Pat.Gilardi@sonoma-county.org](mailto:Pat.Gilardi@sonoma-county.org)>; Michelle Whitman <[Michelle.Whitman@sonoma-county.org](mailto:Michelle.Whitman@sonoma-county.org)>; Lynda Hopkins <[Lynda.Hopkins@sonoma-county.org](mailto:Lynda.Hopkins@sonoma-county.org)>; Susan Upchurch <[Susan.Upchurch@sonoma-county.org](mailto:Susan.Upchurch@sonoma-county.org)>; James Gore <[James.Gore@sonoma-county.org](mailto:James.Gore@sonoma-county.org)>; Jennifer Mendoza <[Jennifer.Mendoza@sonoma-county.org](mailto:Jennifer.Mendoza@sonoma-county.org)>; David Rabbitt <[David.Rabbitt@sonoma-county.org](mailto:David.Rabbitt@sonoma-county.org)>; Andrea Krout <[Andrea.Krout@sonoma-county.org](mailto:Andrea.Krout@sonoma-county.org)>  
Cc: Tennis Wick <[Tennis.Wick@sonoma-county.org](mailto:Tennis.Wick@sonoma-county.org)>; Jane Riley <[Jane.Riley@sonoma-county.org](mailto:Jane.Riley@sonoma-county.org)>; Milan Nevajda <[Milan.Nevajda@sonoma-county.org](mailto:Milan.Nevajda@sonoma-county.org)>  
Subject: ADUs in Ag Zones

EXTERNAL

Good morning Chairman Rabbitt and Sonoma County Supervisors.

Attached are comments from CAFF/Farmers Guild Sonoma County regarding the proposed remove of the Z overlay on some Ag Zoned parcels.

As stated in our letter, we submitted comments when this issue was brought to the Planning Commission in May and requested to receive notice of further action but only learned that this issue was coming to your Board by reading the agenda Friday night.

We feel that this proposal would be a significant change in land use and deserves adequate notice especially to rural land owners and residents of the affected areas. The resulting increase in traffic and land prices and possible loss of potential lower-cost farm worker housing in favor of non- ag residential use are impacts that need to be seriously evaluated.

We ask that you deny the current proposal and instead direct staff to prioritize updating the farm worker housing standards and review the process of requesting exemptions to this Z overlay.

Thank you for considering our views on this important topic.

Wendy Krupnick

Vice president, CAFF/Farmers Guild Sonoma County

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COMMUNITY ALLIANCE WITH FAMILY FARMERS

SONOMA COUNTY CHAPTER

**August 12, 2019**

**To: Sonoma County Board of Supervisors**

**From: The Policy Committee for CAFF/Farmers Guild Sonoma County**

Community Alliance with Family Farmers (CAFF)/ the Farmers Guild is a united statewide organization of farmers, ranchers and sustainable food system advocates who are working to create more resilient family farms, communities and ecosystems.

Our Sonoma County chapter has been actively involved with local land use issues for many years. We provided substantial input during the General Plan 2020 update process and to the subsequent Ag zoning revisions. We have advocated for protections for agricultural lands, upholding zoning standards and increasing support for diversified farms, especially on smaller parcels.

The following comments are largely what we submitted to the Planning Commission on this topic in May. We were contacted by Doug Bush a few days before the May hearing alerting us to the proposal and inviting our input. We appreciated this notification but as an all-volunteer group, more time for circulating the proposal among our members and to develop our position would have been helpful;

In spite of submitting comments and asking to be notified of further actions on this proposal, we received no notification of the hearing on August.13. I happened to read the Board agenda Friday night and saw it listed there. **The proposal to allow at least 1,377 and potentially 1,924 new homes in rural ag zones would have a significant and long term impact on those rural areas.** The ag community and surrounding neighbors need and deserve to be alerted and to have adequate time to evaluate this proposal.

The need for more affordable housing has impacted the farming community significantly as many who would like to farm here – including from local farm families – cannot afford to live here.

But we do not believe that removing restrictions on ADUs in Ag zones and allowing 1,200 sq. ft. second homes will provide affordable housing or support ag as the primary use of those parcels.

The staff report points to farm worker housing standards as not providing for adequate housing for farm workers. We agree and have been advocating for updating these standards for several years. If, "...smaller agricultural parcels do not typically meet the criteria for these units (e.g. 1 agricultural employee unit for each 20 acres of vineyards) but could otherwise support an ADU", **the solution should be to update the farm worker housing standards, not to open up these parcels to non-ag residential uses.**

We have offered to help convene a group of ag stakeholders and work with staff to update these standards.

These smaller ag parcels are in high demand for vegetables, fruit, flowers, berries, small livestock and other high value crops. Their ag value should not be under-rated or diminished by changing to residential land use. In addition, **a second home on the property may well raise the land price so it is no longer affordable for agriculture.**

Affordability of ADUs due to the 1,200 sq. ft. limitation is assumed in the staff report but there are no affordability restrictions proposed. As anyone who has been looking for rentals in recent years knows, size does not indicate affordability. Most smaller homes are renting for much higher prices than most farm workers, (or other low to moderate wage workers), can afford. A 2018 survey was cited but it does not indicate the size of the ADUs that were included. My understanding is that 1,200 sq. ft. is much larger than the ADUs the cities are allowing. And the results are based on just 116 out of 928 households surveyed. Again, the experience of those who are searching for housing is that home are renting for much higher prices than listed in the survey.

We are also very concerned that the proposal will lead to increased traffic burden on already congested roads not built for this volume of traffic. We do not agree that many of the roads in the proposed areas have "light" traffic. Apparently the traffic study used to evaluate this impact is not current and we know that traffic has gotten significantly heavier in the last couple of years. ADUs are supposed to be near public transit and/or public services but these parcels are all in rural areas with neither of these.

The County is supposed to use vehicle miles traveled to evaluate new development proposals and the cumulative impact of all these new units needs to be subject to the same evaluation. We feel that the vast majority of these ADUs will be used by non-farmers so residents will need to drive to work, shop, school, etc, increasing vehicle miles traveled and impacting neighborhoods with noise, traffic and more accidents.

The County and cities have committed to city-centered growth and reducing greenhouse gas emissions. This proposal would take us in the opposite direction

We suggest that an improved process for individual land owners to apply for exemptions to the Z overlay would be a better solution than removing this safeguard to the integrity of Ag zoning. Please uphold the long term investment in agriculture and rural character that make this county the special place it is and deny this proposal.

Thank you for considering our views.

Wendy Krupnick

Vice President, CAFF Sonoma County

**From:** [mesa@sonic.net](mailto:mesa@sonic.net)  
**To:** [Doug Bush](#)  
**Subject:** Re: Z Rezoning Information  
**Date:** Thursday, August 08, 2019 10:29:02 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)

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## EXTERNAL

Hello Doug,

Thank you for the update. I would like you to share my input with the Board.

Dears County Board,

My wife and I are in our seventies, we are interested in the addition of a small ADU for our future needs. Initially, we could use the new unit for income , later for housing assistance for caregivers or family helpers, ultimately, as our scaled down residence while renting out our current house. I believe that these uses conform with usual expectation for second units and would allow us to live our remaining years here in our lovely Sonoma county home. We have plentiful water, great drainage for additional septic, and we are surrounded on three sides by a large vineyard. There is minimal fire hazard and the traffic increase would be minimized since we are only few hundred yards from the intersection of Hwy. 116 and Occidental road.

It has always concerned me that the zoning restrictions here could be included in these "Z" designation unlike my neighbors down the street or on the other side of the street. This always seemed an unfair and arbitrary restriction created by a broad brush to limit growth rather generally. Hopefully you will be open to these zoning adjustments and fine tune the codes while modestly increasing the growth of our county that we sorely need.

Sincerely, James Monsour

8150 Occidental rd.

Sebastopol, CA

On 2019-08-05 09:34, Doug Bush wrote:

Hello Jim,

I just heard your voicemail and wanted to follow up with some details on the status of the countywide rezoning project. This item has been scheduled for a public hearing on August 13, around 1:45pm. A copy of the notice is attached here with additional information. If you have any additional questions or comments, please let me know.

Regards,

**Doug Bush, MCRP**

Comprehensive Planning

[www.PermitSonoma.org](http://www.PermitSonoma.org)

County of Sonoma

2550 Ventura Avenue, Santa Rosa, CA 95403

Direct: 707-565-5276 | Office: 707-565-1900



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## Doug Bush

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**From:** Stephen Moore <stephenmoorehomes@gmail.com>  
**Sent:** Saturday, August 03, 2019 4:30 PM  
**To:** Doug Bush  
**Subject:** zone Z removal 2115 Facendini Lane

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

### EXTERNAL

Doug,

I own property at 2115 Facendini Lane, and unfortunately will not be able to attend the (hopefully) final hearing regarding removal of Z designation on my land. I would like to enter into the record my position regarding said removal.

My family bought the 10 acre property 3 years ago from a family who had owned it 25 years, and had to sell when they were too old to take care of the land. The property includes the original 100yo 4 -room farmhouse, and surrounded by apple and mixed fruit trees. We currently live full time in SF and use it for weekends. However, our retirement plan is to move there full time, and within years, we'll find ourselves in the same position as the former owner, too old to care for it. Removing the Z allows us to convert the 1000sq ft farmhouse at the front of the property to an ADU, and construct a main house on the back of the property. This allows us to rent the smaller front house to a local family who can act as caretakers. This will allow us to preserve and expand the fruit trees and organic garden, bee keeping, and chickens. It's always been ironic that we could fill the land with grapes and use a ton of water, but it's been prohibitive to build a house and leave room to also house someone local at a rent paid on a living wage. We hope this goes through.

**Cheers,  
Stephen**

StephenMooreHome  
3845 24th Street  
San Francisco. California 94114  
415.963.2454

**Compass Real Estate**  
California Real Estate License 00874403  
1400 VanNess Ave  
San Francisco. California 94109  
415.963-2454

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**From:** [Joe Arrigoni](#)  
**To:** [Doug Bush](#)  
**Subject:** Z Overlay Exclusion  
**Date:** Tuesday, August 06, 2019 9:13:09 AM

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## **EXTERNAL**

Members of the Sonoma County Planning Commission,

My name is Joe Arrigoni and I am writing to you about a farm in Two Rock Valley called Horse and Swallow Horse Ranch that sits in the 'Z' Overlay Exclusion District. Horse and Swallow is a 40-acre working horse ranch and on behalf of my family, I'd like to express why this parcel is so special to the area and how the removal of the overlay exclusion would benefit the county. The ranch does what most horse ranches do; provide riding lessons and horse sponsorship for children and adults, homes for horses, but can also serve as a designated pasture for horses that are in danger during fire season.

The ranch is owned by my in-laws who are getting on in years and the day-to-day of running 40 acres has become extremely hard for them. My wife and I just had our second child and planned on one day moving up to the ranch when our boys got a little older to help, learn, and eventually take over the farm. This last winter proved that we have to get up there sooner than later from southern California, where we currently live. My mother-in-law, Meg Bennett, hit her head on a metal gate during a heavy rain while bringing in horses from the pasture and had to go to the emergency room. In recent months she has expressed her need for help and with much difficulty, admitted that she can no longer handle the work. Meg Bennett has been running the ranch since 1992 with an unmatched passion for horses and enthusiasm for rescuing them. The ranch has taken in many abandoned and injured horses through the years and Meg even offered the pasture to aid the threatened horses during the fires last year. We plan on making the pasture a more well-known sanctuary to horse owners in surrounding areas if there is ever again another wildfire season like the one in 2018.

Our plan is to move to the ranch in a trailer by November to be there in time to work during the hard months and let my wife's parents focus on their health and enjoy their grandkids. If the accessory dwelling unit exclusion is lifted we hope to build a house and raise our two boys in Petaluma while my wife continues her career as a nurse and I begin my new career as a ranch hand. Our parcel is well over 10 acres, but our needs are simple, they serve the county, and we meet the screening criteria. And if all goes well our sons will one day take over and maybe raise honey bees and teach future generations how to care for horses. Thank you for your consideration.

Yours truly,

Joe and Veronica Arrigoni

245 Fallon Rd.

Petaluma

Parcel # 022-140-021

Joe Arrigoni  
562-682-2577

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August 12, 2019

RE: Ordinance amending Sonoma County Code § 26-88-060 (accessory dwelling units) and amending the Official Zoning Database to remove the "Z" Accessory Dwelling Unit Exclusion Combining District from specified parcels in the LIA, LEA, and DA zoning districts. ZCE18-0001

TO: Board of Supervisors, Sonoma County California  
Chairman Rabbitt  
Susan Gorin  
Shirlee Zane  
James Gore  
Lynda Hopkins  
Permit Sonoma Staff  
Sonoma County Counsel

FROM: Rue Furch

Many are concerned that there was inadequate public notification of this countywide Ordinance, especially to those who spoke at the Planning Commission hearing, including those who expressly requested to be notified. Under the circumstances, a hearing delay would be appropriate and appreciated.

Staff's efforts to comply with the 2014 Policy HE 3c have been extensive and thorough. The Housing Element directs that "consideration be given to removing the Z Combining District from agricultural parcels of less than 10 acres in size, where appropriate. Consideration was limited to parcels under 10 acres in order to protect rural resources, open space, and agriculture including high value small farm production. Multiple studies have demonstrated that smaller farm parcels can be extremely economically successful – especially in this area where the Greater Bay Area's demand for locally grown food is increasing.

The United Nations report released recently focuses on climate change impacts to agriculture, emphasizing necessary protections for food producing farms and ranches – notable is the value of increasing consumption of vegetables in diets, and of carbon sequestration on rangelands. Smaller farms in Sonoma County are the breadbaskets for our region. The loss of productive farmland to greater density should be limited to agricultural support.

While larger parcels provide more space for housing, they also are our primary zones for agricultural enterprises. The Seal of the County of Sonoma includes Agriculture as a fundamental value, and resource management as the backbone of our sustainable future. These are key to maintaining our economic future as well. We don't look or function like other Bay Area counties because we've maintained a commitment to these values.

The 1989 General Plan established policies prioritizing agricultural resource preservation and created agricultural housing types exempt from density limits to create housing options in agricultural areas that complement agricultural activities.

The staff report clarifies that the "County has learned that larger agriculturally zoned parcels may meet eligibility criteria to construct farm-related housing units". However, Accessory Dwelling Units (ADUs) are not limited to farm-related occupancy at this time:

"While the ADU would not be limited to occupancy by an agricultural employee or farm family member, as agricultural housing units are, this amendment would allow both an ADU and agricultural housing units on a qualifying property, but would limit the total number of density-exempt housing units on a parcel so that the parcel would not exceed the maximum number of units already potentially allowed by the general plan and zoning code."

The amendment would trade an agricultural housing unit for an ADU, which reduces the number of potential farm housing units in the unincorporated area:

"Where a parcel is eligible for one or more agricultural units and an application has been filed for an accessory dwelling unit, that parcel shall be eligible for one less agricultural housing unit."

Housing is assuredly needed as never before, and should be consistent with city and community-centered growth policies of the General Plan. General Plan Goal LU-2 sets out a standard to:

"accommodate the major share of future growth within the nine existing cities and their expansion areas and within selected unincorporated communities, which are planned to have adequate water and sewer capacities."

City centered growth has been repeatedly endorsed at the ballot box in all nine urban jurisdictions in order to protect our agricultural and rural resource areas, and to reduce impacts of sprawl that increase climate change effects.

If expanded housing is provided throughout unincorporated areas, the general shortage will place otherwise urban dwellers into the unfamiliar impacts and limits of a more rural environment creating unnecessary conflicts, and will not necessarily increase affordable housing since affordability is not required. This will also increase groundwater use, transportation and road impacts.

Staff clarifies that many of the parcels *may* not meet the criteria for ADUs, but over time we have seen unpredicted changes as circumstance and population demands evolve.

A "new objective groundwater use standard is meant to reduce the potential for negative impacts associated with ADU construction countywide. The standard provides that applications for ADUs meet Permit Sonoma's Zero Net Water Guidelines in critical habitat areas where depleted streamflow threatens the recovery of endangered salmonids."

While clearly important, this will not eliminate groundwater drawdown and will certainly increase groundwater use at a time when the State has designated three at-risk basins within Sonoma County, and only with negotiation did the County avoid three more at-risk designations. Sonoma County has always been at the forefront of water policy and should continue to demonstrate foresight and leadership in this arena. "Critical habitat" areas are not the only places that need protection from groundwater drawdown.

The staff report offers ADUs as "one form of affordable housing": A 1200 square foot residence without a rent restriction will not assure affordability. The cost of housing drives the rent up. Rural utility and transportation costs will add to the failure to achieve affordability.

Staff's 2018 survey was another example of their diligence in an effort to examine the impacts of second units. However, this may have been comparing apples to oranges. Historically, affordable housing has been assured by requirements to maintain rental costs, through limited square footage - with consideration of lands where adequate infrastructure exists and public transportation is available in order to accommodate lower income realities and including multi-year requirements to maintain affordability. While a 12% response to the survey is good, it surely cannot be relied upon as representative data given the nature of the questions to people who may not wish to reveal their circumstance.

Staff's recommendation to the Planning Commission attempted to "balance the General Plan Housing Element objectives by eliminating unneeded regulatory constraints and promoting the production of affordable housing, while continuing to protect and support agricultural and environmental resources". This is a laudable goal, thoughtfully researched by staff.

It would be helpful to know where and when the cumulative impact analysis of these countywide changes were done. Housing Element Policy HE 3c suggests the Board "consider removal of Z zoning on parcels under 10 acres" without specifying where an impact analysis would, or has been done on an *undefined* number of parcels, nor does it provide any insights into analysis of the cumulative impact of changes to 1,924 parcels in LIA, LEA, or DA zoning districts across the unincorporated areas of Sonoma County.

As is stated here, there continue to be concerns relative to impacts, and to realizing the goal of providing increased *affordable* housing that is appropriately sited. This is a major crossroad for the County of Sonoma.

\* Protections for groundwater use should not be limited to (but should include) groundwater dependent ecosystems. Restrictions disallowing ADUs in Class 4 water availability areas are inadequate given climate change projections.

\* Accessory Dwelling Units should not replace needed agricultural dwelling units. Housing agricultural workers on land where food production occurs addresses several climate change impacts and provides affordable housing to an underserved community.

Please consider the request that you delay consideration of changes to the Z Combining District. The larger community should be encouraged to carefully consider criteria for changes to Z zoning.

If you've read this far - I sincerely appreciate your commitment, and your stamina.

Respectfully submitted.

**Doug Bush**

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**Sent:**

**To:**

**Subject:**

**Follow Up Flag:**

**Flag Status:**

Sonoma County Board of Supervisors,

I am writing you this letter to provide individual background on my family's property at 1760 Sanders Rd. in Sebastopol, that is being considered for removal from the Z zoning designation.

My wife and I have lived at this property for 30 years, raising our children while enjoying the community spirit in our neighborhood.

Now we are at the stage of life where our kids are launching their careers and developing full lives outside of our home. They are discovering that they cannot afford to live in Sebastopol and are challenged to find housing anywhere in Sonoma County at all.

One of our daughters, Elise Carroll, is a land use planner with Denovo Planning in Sacramento, which helped prepare the Sebastopol General Plan. She took the job in Sacramento because housing was too expensive in her home county. All of our 5 children are struggling to afford to live here and we have a chance to help them by building an ADU on our property at 1760 Sanders RD, if the zoning is changed to accommodate this.

Our property is 4 acres, and is in the area that the planning commission recommended to be rezoned. We are on a private road that I have maintained with my farm tractor ever since we bought the property. We continue to farm apples in the Sebastopol tradition and support our community whenever we can. We love our neighborhood and frequently get together with our neighbors to share the sweet life that we all respect and enjoy.

Our oldest daughter gave us the gift of a granddaughter a couple months ago. She has mentioned many times how wonderful it would be for her daughter to attend the schools that she attended and loved in the Sebastopol area, and be able to provide her daughter with the same academic opportunities that she enjoyed. That could be a real possibility if our property was rezoned to allow ADUs.

Just as farmers prepare the soil for planting and carefully tend the crops for a successful harvest in the future.....Sonoma County has a chance to create a more successful future by approving zoning changes today that will lead to more affordable housing, more children remaining in the County they love, and more children contributing to the success of the County in the future.

Thank you for entertaining this hopeful opportunity.

Sincerely, Jon Carroll

**From:** Chris Grabill [<mailto:cgrabill@gmail.com>]

**Sent:** Thursday, May 02, 2019 8:35 AM

**To:** Jane Riley <[Jane.Riley@sonoma-county.org](mailto:Jane.Riley@sonoma-county.org)>; Doug Bush <[Doug.Bush@sonoma-county.org](mailto:Doug.Bush@sonoma-county.org)>

**Cc:** Efren Carrillo <[ECarrillo@burbankhousing.org](mailto:ECarrillo@burbankhousing.org)>

**Subject:** Re: Z exclusion.

Mr. Bush,

Please accept my letter of support for the resolution and Removal of the Z designation, and ending the exclusion of permitted ADU's on these specific parcels. Sonoma County is an aging community, especially in our rural areas, and with the exodus of many young families due to lack of affordability and availability of permanent housing, any land use/zoning tools to increase the propensity and possibility for 'aging in place' and co-locating are welcome parts of a greater policy solution. We need to do so much more as a community, to recognize the needs of both our aging seniors and our working families, including many more incentives and funding streams for affordable housing in cities, and urban service areas. We are in a moment where 'all of the above' is necessary, so please accept this letter of support, And continue the important work.

Best wishes,

Chris Grabill

- Co-Chair, Santa Rosa Housing Recovery
- Board of Directors, Sonoma County Conservation Action
- Executive Board, Legal Aid of Sonoma County

Sent from my iPhone



## REMOVE Z ZONING ON AG PARCELS

When Sonoma County is claiming to be trying to allow more housing why are some large west county Land Extensive Ag zoned parcels saddled with a Z zoning second unit exclusion when many smaller parcels are allowed to have second units?

Having a second unit also helps with occasional work needing done in exchange for some rent on Ag properties that might not quite qualify for ag employee housing, which is of increasing importance to aging agriculturists still working in their 70's, 80's and even 90's. So often something that may take 15 minutes help when help is there is a project if someone needs to come from a distance. Additional eyes on the ranch can help keep livestock safer from predators, and spot animals in distress, especially if the second unit is located so that different areas of the ranch can be seen from the second unit. Having a second unit instead of dividing the property also helps keep land in agriculture as the tenant is more likely to be aware of agricultural concerns than someone with no ties to the ranch or farm.

So many urban planners and regulators are unaware of the effect some regulations have on rural areas especially. It seems the county has a preference to have long time Ag properties sold to new high income residents that pay a new higher property tax and can afford to spend several hundred thousand, or much more, on a driveway required to be built to higher standards than many county roads.

I have heard that a planner thought large parcels were less fire safe. I believe the opposite is often true. Grazing is a big help and many fire lines stopped at vineyards and were slowed or stopped on grazed parcels.

We were puzzled by a Press Democrat article listing Valley Ford as a high fire danger area. There are few trees and mainly ranches and dairies that value and utilize their grass. Most of those businesses also have large tractors immediately available for fire fighting. Hay is cut and baled at the time it is drying out and silage put up even earlier. By most of fire season pastures are grazed down.

I have an 80 acre parcel bordered by smaller, mostly 5-10 acre parcels, on 3 sides, which with my other 2 parcels total a ranch of 410 acres. Only one neighbors parcel bordering the 80 acres is grazed. One neighbor mows some years but several have tall grass and brush.

Larger parcels are usually grazed by livestock and are more fire safe than many smaller 1-10 acre parcels that are too big to easily mow but usually not fenced for livestock and often not utilized for anything but a house site. There are 4 parcels next to each other joining another parcel I have livestock on that are each about 5 acres. One owner keeps the brush down but the other 3 parcels, 2 have large newer homes, are not grazed and very overgrown with brush 10 feet tall close to the houses. At the fenceline where there are livestock this changes to grass, which is gets shorter the later the season as the livestock graze it down. When it comes to fire danger please consider that large parcels can often be more fire safe. There are also more options on where to build with less cost or proximity to hazards on a larger parcel.

Cost, including the numerous regulatory hurdles such as the amount of engineering now required even on flatter parcels, is an issue that is driving home construction away. I realize some of this is state mandate driven but counties contribute to building difficulties. Road requirements require a better road than the county road the parcel I want to build on is accessed by. Driveways and ranch roads should not need to be so costly. To build the house where I would prefer would be far greater than the cost of the house itself due to the paving requirement.

It does not seem that the county can continue to place Z zoning on parcels that are otherwise buildable because they are "too big" and seriously claim to be concerned about adding housing. Urban buildout is a nice idea but when one son worked at a Bodega Bay restaurant, most of his coworkers had to go to Santa Rosa area for housing.

Thank you,  
Sharon Harston



475 Aviation Blvd., Suite 220 ■ Santa Rosa, CA 95403 ■ 707-542-1579 ■ [northbayrealtors.org](http://northbayrealtors.org)

May 2, 2019

Sonoma County Planning Commission  
2550 Ventura Avenue  
Santa Rosa, CA 95403-2887

**Subject: ZCE 18-0001, Z Combining District Removal (Accessory Dwelling Units)**

Members of the Sonoma County Planning Commission,

On behalf of the North Bay Association of REALTORS® (NorBAR), I am writing to share our support for the proposed removal of the Z (Accessory Dwelling Unit Exclusion) Combining District from identified agriculture district parcels and establish new objective standards for review of ADU applications countywide.

Rezoning the proposed parcels to remove the Z Combining District will remove significant barriers for the production of Accessory Dwelling Units (ADUs) while ensuring the application of uniform, ministerial standards. ADUs can help support small farms by providing supplemental income and agricultural worker housing for farming families when their properties do not qualify for other agricultural housing types. Allowing accessory units on agricultural properties may also reduce commute times and associated traffic and pollution by providing rural housing near rural jobs.

This proposal takes significant precautions to ensure the exclusion of high-risk areas and excludes parcels located within high/very high fire hazard severity zones or critical biotic habitat areas for the CTS, where the potential for groundwater contamination is present or groundwater levels would be compromised, and so on.

Finally, jurisdictions throughout California -- including our service area of Sonoma, Napa, Mendocino and Lake - have taken great strides to facilitate the creation of ADUs and other forms of affordable, and affordable workforce housing -- this proposal aligns with those worthy efforts and we appreciate your leadership on the local housing crisis.

Thank you for considering our input. Should you have any questions regarding our position, please do not hesitate to contact our Government Affairs Director, Lisa Badenfort, at 707-636-4294, or [lisa@northbayrealtors.org](mailto:lisa@northbayrealtors.org).

Respectfully,

Carol A. Lexa, Chair  
Local Government Relations Committee

The North Bay Association of REALTORS® is a four-county trade association representing over 3,500 real estate professionals and affiliates. We serve as an advocate for housing and homeownership, the preservation of property rights, and a thriving real estate economy. In addition to advocacy, we serve as a collaborator and resource to decision-makers and the public on the persistent quality of life issues facing the North Bay.

cc:

Commissioner Greg Carr	1st District
Commissioner Dick Fogg	1st District
Commissioner Larry Reed	2nd District
Commissioner Todd Tamura	2nd District
Commissioner Paula Cook	3rd District
Commissioner Komron Shahhosseini	3rd District
Commissioner Ariel Kelley	4th District
Commissioner Cameron Mauritson	4th District
Commissioner Pamela Davis, Chair	5th District
Commissioner John Lowry	5th District

Tennis Wick, Director, Permit Sonoma (PRMD)  
Jane Riley, Comprehensive Planning Manager, Permit Sonoma (PRMD)  
Doug Bush, Project Planner, Permit Sonoma (PRMD)

## Lucia Fincher

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**From:** Jane Riley  
**Sent:** Thursday, May 02, 2019 11:52 AM  
**To:** Lucia Fincher  
**Subject:** FW: Z (Accessory Dwelling Unit Exclusion) Combining District Removal

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**From:** Efren Carrillo [mailto:ECarrillo@burbankhousing.org]  
**Sent:** May 02, 2019 11:44 AM  
**To:** Tennis Wick <Tennis.Wick@sonoma-county.org>  
**Cc:** Doug Bush <Doug.Bush@sonoma-county.org>; Jane Riley <Jane.Riley@sonoma-county.org>  
**Subject:** RE: Z (Accessory Dwelling Unit Exclusion) Combining District Removal

On behalf of Burbank Housing, I am writing to express our support for the recommendation to remove the Z Combining District from identified agricultural district parcels and establish new objective standards for review of Accessory Dwelling Unit applications county-wide. In order to increase the supply of affordable housing, ADU's have been seen as an alternative in representing a promising strategy to address our housing affordability challenges.

There are many potential benefits and key advantages for ADU's in design and usage, and can be tailored to meet individual housing and financial needs. Additionally, ADU's can assist homeowners/property owners offset their own property costs with rental income. This is especially important in the agricultural community. A significant number of ADU's could also be offered for free or in exchange of work in the agricultural community, potentially filling a particular need for low-income households. ADU's can provide a critical supply of affordable housing in communities like ours experiencing high rents.

Regulatory reform, technical assistance, political will and community support are key in moving good ADU policies forward. We appreciate the County's focus on this, and other housing affordability policies.

Burbank Housing is a nonprofit dedicated to building quality affordable housing in the North Bay. We create vibrant local communities that are carefully designed, professionally managed, and sustainable both financially and environmentally, to foster opportunities for people with limited-income of all ages, backgrounds and special needs. For over 37 years, we have led the region in creating and maintaining quality, sustainable housing and rental opportunities for more than 10,000 people in over 60 communities.

Kindly,

Efren

Efren Carrillo, Director of Government and Community Affairs

**From:** [Dennis Rosatti](#)  
**To:** [Jane Riley](#)  
**Cc:** [Doug Bush](#)  
**Subject:** Re: Comments please!  
**Date:** Thursday, May 02, 2019 12:18:09 PM

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May 2, 2019

Dear County of Sonoma Planning Staff,

Reading the staff report for today's 5/2/2019 Meeting on the removal of Z status zoning for select parcels, I see this is aimed at parcels under 10 acres and as proposed by Staff Recommended Option 1, unlocks 1,377 parcels to make them eligible for ADU's, where a dwelling unit already exists first. This is not applied to the full 3,985 parcels that Z District currently applies to because it appears you are use this filter to determine eligible parcels on a site specific basis:

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<!--[endif]-->

- The property is not located within a high or very high fire hazard severity zone;
- The property is not within a critical biotic habitat area for the California Tiger Salamander;
- An ADU on the parcel does not present the potential for groundwater contamination;
- An ADU on the parcel will not affect groundwater levels;
- The property is not located in a Traffic Sensitive Combining Zone;
- The property is not subject to a Land Conservation Act (Williamson Act) or other open space contract, or other recorded agricultural easements; and
- The property is not located in the Coastal Zone.

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I don't see the real problem with removing the Z District designation from these parcels, especially with the use of the above filter. The "full build out" of the 1,377 units is very unlikely to happen, and it would be incremental additions of units over time. Where appropriate, I think people should be allowed to build a granny unit on their property (a unit under 1,200 sq ft) so they can potentially age in place, share property with children whom are just entering adulthood or starting a family or returning home for whatever life crisis, for caretakers for property or health, and for potential ag workers. I do think it would be good to have a restriction on Air B+B/vacation rentals for ADUs without approval by the County, and perhaps a time restriction so that these potential "affordable" housing units will actually be build to help deal with our housing crisis now (so a 5 year restriction where the new units would not be eligible for vacation rental status).

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We need the affordable, and other, housing in Sonoma County. I don't like the idea of building housing outside the UGB's/USA's in general; however I don't see this as a big problem with a potential for 1,377 units (unlikely to get to

that full build out as stated earlier) spread out around the county. It's a far superior option than pushing our affordable housing to Lake or Mendocino Counties and making the housing "someone else's problem." I would like to see a restriction or at minimum a process for ADU's to have to go through to gain temporary vacation rental status (ie- for 5 years vacation rental status is prohibited for new ADU's in these parcel types (or anywhere!), then an application process is used that is rigorous and open to public input).

Thank you for your consideration of my personal comments. (Representing only my own opinion in these correspondence).

Dennis Rosatti  
Sebastopol, CA

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COMMUNITY ALLIANCE WITH FAMILY FARMERS

SONOMA COUNTY CHAPTER

**April 30, 2019**

**To: Sonoma County Planning Commission**

**From: The Policy Committee for CAFF/Farmers Guild Sonoma County**

Community Alliance with Family Farmers (CAFF)/ the Farmers Guild, are united in a statewide organization of farmers, ranchers and sustainable food system advocates who work to create more resilient family farms, communities and ecosystems.

Our Sonoma County chapter has been actively involved with local land use issues for many years. We provided substantial input during the General Plan 2020 update process and to the subsequent ag zoning revisions. We have advocated for protections for agricultural lands, upholding zoning standards and increasing support for diverse ag especially on smaller parcels.

The need for more affordable housing has impacted the farming community significantly as many who would like to farm here – including from local farm families – cannot afford to live here.

But we have many concerns about the proposal to remove restrictions on ADUs in Ag zones as is currently being proposed. There are a number of assertions in the staff report that we do not think are accurate. The ag community should have been consulted when drafting this proposal and request that more time be given for adequate outreach and discussion prior to any decisions being taken by the Planning Commission

The proposal to allow significantly more ADUs in ag zones would have a significant and long term impact on those rural areas. We very surprised to learn of this with very short notice and feel that the ag community and surrounding neighbors need and deserve to be included.. No one I have contacted had any idea that this was being proposed and all were very concerned.

The staff report points to farm worker housing standards as not providing for adequate housing for farm workers. We agree and have been advocating for updating these standards for several years. Row crops, flowers and other high value labor intensive crops are not even listed and it has been a long time since there were many acres of prunes or pears in the county. Multi-species livestock rotations are not considered as well. In addition, today's families are often not the historic nuclear blood relations that farm family housing historically had.

The solution to this problem is to update the farm worker housing standards. The current proposal has no restrictions that would limit the housing to those working the land. We would be happy to help convene a group of ag stakeholders and work with staff to update these standards.

Affordability of ADUs due to the 1,200 sq. ft. limitation is assumed in the staff report but there are no affordability restrictions proposed. As anyone who has been looking for rentals in recent years knows, size does not indicate affordability. Most smaller homes are renting for much higher prices than most

farm workers, (or other low to moderate wage workers), can afford.

We feel that the current proposal will lead to increased traffic burden on already congested roads not built for this volume of traffic. We do not agree that many of the roads in the proposed areas have “light” traffic. The County is supposed to be use vehicle miles traveled to evaluate new development proposals and the cumulative impact of all these new units needs to be subject to the same evaluation. We feel that the vast majority of these ADUs will be used by non-farmers and for more Air B&Bs and vacation rentals, impacting neighborhoods with noise, traffic and further exacerbating rental prices.

We also agree with many of the concerns regarding this proposal submitted by Greenbelt Alliance.

We are grateful that Doug Bush contacted us but are dismayed at the very short time frame and ask that any decisions be postponed until much more thorough outreach can be done and farm worker housing standards updated.

Thank you for considering our views.

Wendy Krupnick

Vice President, CAFF Sonoma County

**From:** [Teri Shore](#)  
**To:** [Gregory N Carr](#); [Sonomafogg](#); [Todd Tamura](#); [larry@reedgilliland.com](#); [Paula Cook](#); [komronshahhosseiniSCPC@gmail.com](#); [arielkelley707@gmail.com](#); [Cameron Mauritson](#); [Pamela Davis](#); [John Lowry](#)  
**Cc:** [Jane Riley](#); [Arielle Kohn](#); [Doug Bush](#)  
**Subject:** Z (Accessory Dwelling Unit Exclusion) Combining District Removal - May 2  
**Date:** Monday, April 29, 2019 12:25:39 PM

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Dear Sonoma County Planning Commissioners and Permit Sonoma,

The proposed removal of the Z (Accessory Dwelling Unit Exclusion) Combining District Removal has the potential to provide affordable housing for people who work on agricultural properties across the county.

However, it also has the potential to increase the number of people in Sonoma County who live in rural areas that are distant from towns and cities with public services, jobs and schools.

Without further environmental analysis, it is likely, though difficult to know for sure, that by removing the Z zoning as proposed, that Vehicle Miles Traveled are likely to increase and work against the county's ongoing desire to reduce greenhouse gas emissions and focus on city-centered growth.

Today the county allows ADUs up to 1,200 square feet - which is the size of a double-wide mobile home - that easily accommodate a family of four. If all the identified parcels build the maximum size ADU with the maximum number of people, that would equal up to 5,500 more people on ag lands in rural areas.

Clearly, the County of Sonoma is intent on moving this forward, though perhaps it should really be considered as part of the General Plan Update not as a fast-tracked stand-alone ordinance. Doing so would provide rural landowners and the public to weigh in and consider the long-term impacts of this far-reaching change in zoning.

In any case, as you move forward to allow more residential development via ADUs in the rural areas, you may want to consider the following:

1. How many of the parcels are in community separators? It looks at first glance that there are some in Sonoma Valley and probably outside of Petaluma and Healdsburg. At the least, please request that staff provide an overlay of the CS, where people voted by 81 percent to prevent increased development.
2. Will these ADUs be limited to farm workers and ag employees or open to anyone?
3. Is there any affordability requirement?
4. Is there any reason they couldn't be used as vacation rentals or air b and bs or hospitality?
5. Will these ADUs be allowed for marketing and other promotional purposes?
6. Will removing the Z zoning then conflict with LAFCO policies that prohibit adding more units and/or rooms to Outside Service Agreements (Cortese-Knox)?



Thank you for your consideration.

Teri Shore

--

Teri Shore  
Regional Director, North Bay

Greenbelt Alliance

555 Fifth Street, Suite 300 A | Santa Rosa, CA 95401

1 (707) 575-3661 office | 1 (707) 934-7081 cell | [tshore@greenbelt.org](mailto:tshore@greenbelt.org)

[greenbelt.org](http://greenbelt.org) | [Facebook](#) | [Twitter](#)

*P.S. [Join me for happy hour May 16](#) in San Francisco to support local farms.*

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## Loss of Homes to Wildfire

### High Risk of Wildfire Tied to Density of Homes and WUI

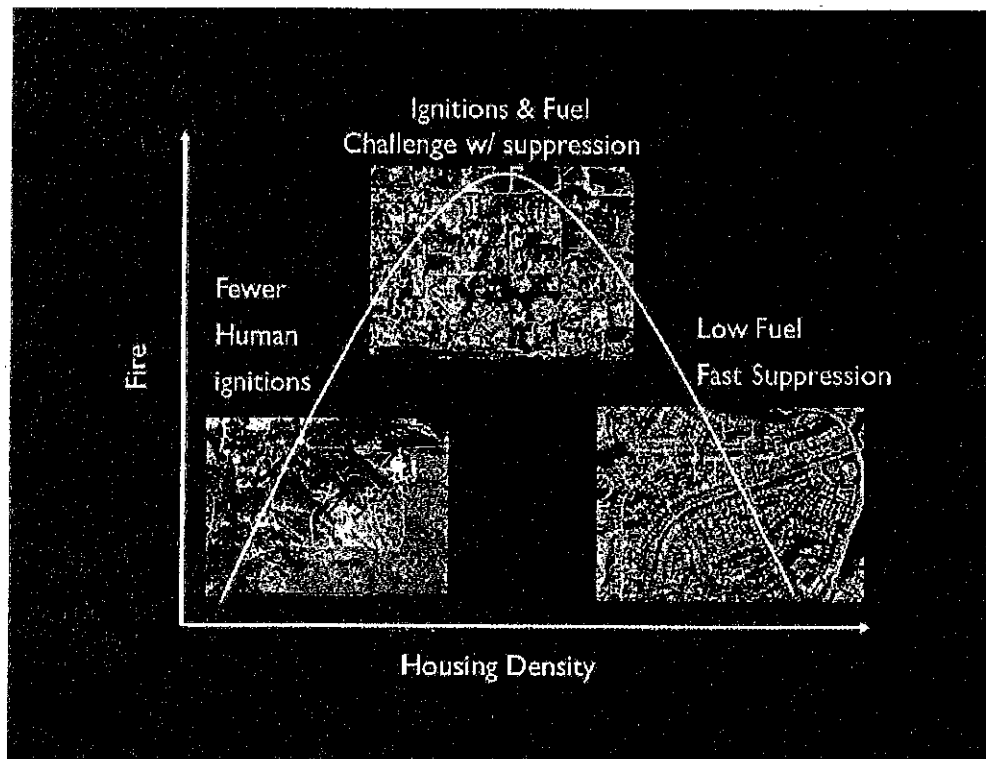
Researchers studying devastating firestorms in California and beyond have found that medium housing density is more highly correlated with loss of life and home from wildfires *than any other factors*.

Topography, fuel, defensible space, building construction; all are less important in determining risk from wildfires than the medium density typical of subdivisions that sprawl beyond the urban edge into wildlands.

Researcher Alexandra Syphard of the Conservation Biology Institute presented this finding on development and wildfire at the Living with Fire Symposium at Sonoma State University. This science was based on several studies of wildfires across California and the United States.<sup>1</sup>

This work is illustrated in the bell-curve graph which shows the highest wildfire risk in medium densities often seen in the wildland urban interface. The lowest wildfire risk is in the urban areas of high density and in very-low density ranch or farm lands with one or two houses surrounded by large acreage.

This information needs to be incorporated into County policies and the General Plan in order to advance fire-safe land use policies.



<sup>1</sup>

Syphard et al. 2012, and others. Housing Arrangement and Location Determine the Likelihood of Housing Loss Due to Wildfire.

**From:** [Jean Powers](#)  
**To:** [PermitSonoma](#)  
**Subject:** Attn: Jane Riley Re: Z Zoning Reexamination  
**Date:** Monday, November 05, 2018 2:30:06 PM

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Hello,

This may land on someone else's desk before Jane Riley's. She spoke @ the housing meeting in Sebastopol on Sunday, Nov 4. We exchanged e-mails, but hers gets bounced by my server. Tried her office phone #. Announcement said she's out for a week or so. Please forward to her on her return & if you have any information on upcoming zoning meetings or similar Z properties that have been rezoned or zoning confirmed, please advise.

Thank you!

Good morning, Jane,

I attended the housing day @ Sebastopol Community Center Sunday, Nov 4, & listened to 1st panel that you were on. Very interesting! You mentioned that about 1000 Z zonings were being reexamined.

I'd like to put my parcel forth as an example of the Catch 22 Z has put me in.

I own 15+ acres, about 8 are in dry farmed heritage apples. I plan to keep my apples, but expansion isn't logical due to slope. The sloped areas are wild habitat for oaks, manzanita, owls, hawks, song birds, woodpeckers, bobcats, skunks, raccoons, possum, fox, deer.

I admit that due to the \$ in vineyards, I did contact a company interested in adding to their rented acreage. My parcel did not interest due to small size, difficulty operating equipment on slopes & need for new well.

There is one house on the 15 acres, the original built by my farming ancestors around 1880. Since I have been living here, I've wanted to build an Accessory Dwelling Unit- just about exactly as the County has outlined today! Current well is excellent & septic allows for 4 bedrooms- I have 2.

When I took idea to planning department in past, I was given a set of regulations which if I passed, I could build a 2nd unit of ANY size, presuming I'd rent to farm workers. The agricultural requirements were all beyond current or future possibility, giving # of trees, acres in vegetables, # of geese or goats, etc., & limiting capacity of my well & slopes of land.

That meant that on my 15 acres I could only build a tiny "guest house" (no kitchen) within 300 feet of home.

My long held desire is to build a 2 car garage with a rental studio above, quite within the Accessory Dwelling Unit requirements.

It would not impact my apple tree farming acreage, neighbors, nor do I wish to subdivide.

Address: 3520 Sullivan Rd, Sebastopol.

Parcel #: 104-060-040-000

Tax Rate Area: 130-013

You told me there are subsets of Z zoning , but I don't know which I have. Sorry, Jane.

Sincerely-  
Jean Powers

**From:** Jennifer Mann  
**To:** Doug Bush  
**Subject:** Z Overlay  
**Date:** Thursday, November 01, 2018 11:31:16 AM

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Dear Doug,

Thank you for including me in the notification list for updates on the removal of the antiquated Z Overlay in West Sebastopol.

My adult children and I bought this home at 2035 Blucher Valley Rd Sebastopol 95472 parcel no. 025-012-002 in July 2018 with the intention of building an ADU for me, the Grandmother to our 3 and 5 year old children. We have adequate water, strong septic and nearly 3 acres of sunny, landscaped building space. We were happily making progress to obtain plans and permits when we were completely STOPPED by a friend who researched our property online and discovered that our parcel falls under the Z Overlay zoning ADU exclusion. I checked with the Planning Commission yesterday and learned for the first time that what he found was true, even though the criteria do not fit our situation.

My son and daughter in law and I each sold our homes to create this family compound WITH NO DISCLOSURE by anyone about this antiquated restriction. I am willing to help support the removal, without having to apply for a parcel specific exemption, in any way that I can.

Thank you for your shepherding of the proposal to the Planning Commission and the Board of Supervisors to remove this restrictive zoning in times of such dire housing needs in Sonoma County.

Very truly yours, Jennifer Mann  
2035 Blucher Valley Rd  
Sebastopol, CA 95472  
707-583-6548

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Jennifer Mann,  
"I am open to life beyond my wildest dreams."

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