



## Sonoma County Planning Commission STAFF REPORT

**FILE:** ZCE21-0002  
**DATE:** June 29, 2023  
**TIME:** At or after 1:30 pm  
**STAFF:** Claudette Diaz, 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/ Applicant:** Joshua Kloeping  
**Address:** 3463 Middle Two Rock Road, Petaluma  
**Supervisory District(s):** 2  
**APN:** 022-220-021  
**Description:** Zone Change to remove the Accessory Dwelling Unit Exclusion (Z) Combining District to a 76.73-acre parcel to allow for a future accessory dwelling unit. The subject property is developed with one single family residence and residential accessory structures.  
**CEQA Review:** CEQA Statutory Exemption (Public Resources Code Section 21080.17 ordinances implementing Government Code section 65852.2 re Accessory Dwelling Units); Guidelines Section 15282(h) which provides for the adoption of an ordinance regarding second units in a single-family or multi-family zoning district to implement Government Code Section 65852.2; CEQA Categorical Exemption (CEQA Guidelines Section 15301, Existing Facilities); (CEQA Guidelines Section 15305, Minor Alterations in Land Use Limitations)  
**General Plan Land Use:** Land Extensive Agriculture (LEA) 100 acres per dwelling unit (100)  
**Specific/Area Plan Land Use:** Petaluma Dairy Belt Area Plan  
**Ordinance Reference:** Sec. 26-06-010 - 040 – Agriculture and Resource Zones  
Sec. 26-24-040 – Agricultural Employee Housing: Full-Time  
Sec. 26-65-005 – 040 – RC Riparian Corridor Combining Zone  
Sec. 26-76-005 – Z Accessory Dwelling Unit Exclusion Combining District  
Sec. 26-88-060 – Accessory Dwelling Units  
**Zoning:** LEA (Land Extensive Agriculture) B6 100 (100 acres per dwelling unit) Z (Accessory Dwelling Unit Exclusion Combining District), RC 50/25 (Riparian Corridor Combining District, 50-foot setback and 25-foot setback)



## **RECOMMENDATION**

The Permit Resource and Management Department (Permit Sonoma) recommends that the Planning Commission adopt a resolution and recommend that the Board of Supervisors adopt an ordinance finding the project exempt from the California Environmental Quality Act under Public Resources Code § 21080.17/CEQA Guidelines § 15282(h) (ordinances implementing Gov. Code § 65852.2), CEQA Guidelines § 15301 (Existing Facilities), CEQA Guidelines § 15305 (Minor Alterations in Land Use) and approve a zone change to remove the Accessory Dwelling Unit Exclusion (Z) Combining District from the subject parcel to allow for the potential for the development of an Accessory Dwelling Unit.

## **EXECUTIVE SUMMARY**

The project proposes the removal of the Accessory Dwelling Unit Exclusion (Z) Combining District on a 76.73-acre parcel to allow for a future accessory dwelling unit (ADU) on site. The Z Combining district was applied to the subject parcel as part of the implementation of the 1989 General Plan.

In 2019 the Board of Supervisors adopted Ordinance No. 6285 for a Countywide “Z” Accessory Dwelling Unit Exclusion Combining District removal from approximately 1,924 specified parcels, including parcels over 10 acres, located in the Land Intensive Agriculture (LIA) Land Extensive Agriculture (LEA), and Diverse Agriculture (DA) zoning districts who passed the screening criteria for rezoning (Policy HE-3c). Parcels that did not meet the initial screen criteria for the 2019 countywide Z removal ordinance are assessed on a case-by-case basis; the subject parcel meets the criteria for removal of the Z combining district, as discussed below.

Parcels in waiver prohibition areas were not included in the countywide legislative proposal due to the differing site-specific environmental and regulatory constraints in the various waiver prohibition areas. Parcels in waiver prohibition areas would continue to be considered on a case-by-case basis. Most waiver prohibition areas are characterized by clusters of small parcels without the ability to provide adequate setbacks for septic systems to neighboring wells. That is not the case for the subject parcel, which is a 76.73-acre parcel surrounded by parcels of 1 acre to 380 acres in size.

The project site does not meet the criteria for inclusion in the Z Combining district.

## **PROJECT SITE AND CONTEXT**

### ***Background***

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

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 county-wide, and consider removing the restrictions where appropriate.”



In 2019 the County adopted Ordinance No. 6285, which removed the “Z” Accessory Dwelling Unit Exclusion Combining District from approximately 1,924 specified parcels, including parcels greater than 10 acres, located in the LIA, LEA, and DA zoning districts countywide that met the following screening criteria:

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

The subject parcel meets all of the above screening criteria. The parcel is located within the Petaluma Waiver Prohibition Area, which was not included in the Countywide legislative proposal due to the differing site-specific environmental constraints in these areas. Waiver prohibition areas are considered on a case by case basis. The subject parcel has approved 4-bedroom septic system, SEP06-0253. A new septic system would be required to meet special standard requirements for the West Petaluma Area waiver prohibition area, as described in the Onsite Wastewater Treatment System (OWTS) Manual, adopted on August 15, 2019.

**Site Characteristics**

The project site is 76.73 acres and is located in west Petaluma, approximately 4 miles from the City of Petaluma limits. The site is developed with a single family dwelling and accessory structures.

**Area Context and Surrounding Land Uses**

The surrounding area consists of residential and agricultural uses. Parcels range from 1 acre to over 300 acres in size.

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

**Significant Applications Nearby**

No significant applications nearby.

**Access**

The site is accessed via Middle Two Rock Road, a County Right of Way.

**Wildfire Risk**

The subject parcel and surrounding parcels are located within a Moderate Fire Hazard Severity Zone. Permit Sonoma Fire Prevention Staff conducted a site visit on May 5, 2023 and determined that the addition of an ADU on site would not increase fire risk.

**Water/Wastewater/Utilities**



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



The parcel is served by an existing private well and septic system, SEP06-0253.

The subject parcel is located within a Class 2 Groundwater Availability Area, which indicates a major natural recharge.

The subject parcel is located in the Petaluma Nitrate Waiver Prohibition Area, one of several areas in Sonoma County designated as waiver prohibition areas, where variances or waivers to septic development standards (per Section 18 of the Sonoma County Onsite Wastewater Treatment Systems Manual) are not allowed, or where there are special standards for construction of wells or septic systems. Special standards required in the Petaluma Nitrate Waiver Prohibition Area were established by Ordinances 2607 (1980) and 3019 (1982), following the discovery of serious nitrate contamination in groundwater in the area. Those standards include wet weather groundwater determination and percolation testing for all septic systems, and minimum annular seals of at least 100 feet for water wells.

***Agricultural Conditions/Land Encumbrances/Contracts***

The parcel is not subject to any agricultural conditions, land encumbrances, or land conservation contracts (Williamson Act) and is not currently operating any agricultural uses. The parcel does not meet thresholds to allow for agricultural employee dwelling unit.

The applicant recorded a Right-to-Farm under Document No. 2023015198 on April 10, 2023.

***Other Environmental Conditions***

A small portion of the parcel is located in close proximity to a designated blue line stream that feeds into Laguna Lake, located approximately 2 miles south of the project site. This blue line stream has a 50-foot setback from the top of bank to structures and agricultural development. ADUs are required to observe applicable setbacks of the Riparian Corridor (RC) Combining District, as provided in Article 65 of Sonoma County Code. ADUs proposed within the RC setback will not be considered complete for processing until the applicable permit for development within the RC setback is obtained.

**PROJECT DESCRIPTION**

The applicant is requesting removal of the Z (Accessory Dwelling Unit Exclusion) Combining District from a 76.73-acre parcel to allow for an ADU. The parcel is served by an on-site septic system and well.

***Ordinance History***

*Table 1- Ordinance History*

<b>Date</b>	<b>Ordinance History</b>
July 10, 1990- January 26, 1993	The parcel was rezoned to Diverse Agriculture with an ADU exclusion when the Board of Supervisors adopted Ordinance No. 4225 to rezone parcels to match General Plan land use designations and implement the 1989 General Plan.
January 26, 1993	The Board of Supervisors adopted Ordinance No. 4643 to rezone agricultural zoned parcels to match new General Plan land use designations.



January 24, 2017	The Board of Supervisors adopted Ordinance No. 6191 amending second dwelling unit regulations, adding junior accessory dwelling units regulations, and reducing local regulatory barriers for constructing new accessory dwelling units in accordance with amendments to Gov. Code § 65852.2.
September 17, 2019	The Board of Supervisors adopted Ordinance No. 6285 to remove the for a Countywide “Z” Accessory Dwelling Unit Exclusion Combining District removal from approximately 1,924 specified parcels located in the LIA, LEA, and DA zoning districts countywide.
September 14, 2021	The Board of Supervisors adopted Ordinance No. 6352, the Accessory Dwelling Unit and Junior Accessory Dwelling Unit Ordinance, in compliance with Government Code sections 65852.2 and 65852.22

**Project History**

The table below summarizes key project milestones and events.

Table 2- Project History/Milestone

Date	Project Event/Milestone
07/23/2021	Request for a Zone Change on a 76.73-acre property to facilitate the removal of the Z Combining District
08/02/2021	Referral to pertinent agencies
06/19/2023	Public notice for Planning Commission
06/29/2023	Planning Commission Hearing

**ANALYSIS**

**General Plan Consistency**

Allowing accessory dwelling units on qualifying properties is consistent with General Plan Housing Element goals and objectives to increase opportunities for the production of affordable housing. However, ADUs are restricted in the agricultural zones because many agricultural parcels qualify for agricultural employee units, farm family residences, and/or farmworker units.

**Agricultural Resource Element:**

**Objective AR-2.4:** *“Reduce economic pressure for conversion of agricultural land to nonagricultural use.”*

**Objective AR-3.1:** *“Avoid the conversion of agricultural lands to residential or nonagricultural commercial uses.”*

**Objective AR-4.1:** *“Apply agricultural land use categories only to areas or parcels capable of the commercial production of food, fiber and plant material, or the raising and maintaining of farm animals including horses, donkeys, mules, and similar livestock. Establish agricultural production as the highest priority use in these areas or parcels. ...”*



**Policy AR-3F:** *“Avoid amendments of the land use map from agricultural to a non agricultural use category for the purposes of allowing increase residential density which may conflict with agricultural production.”*

The purpose of the Agricultural Resource element is to establish policies to insure the stability and productivity of the County’s agricultural lands and industries. It is also intended to express policies, programs, and measures that promote and protect the current and future needs of the agricultural industries.

The property owner recorded a Right to Farm for the parcel (Document No. 2023015198), which would protect any agricultural operations on the subject parcel neighboring parcels, within 300 feet, from being considered a nuisance.

The rezoning to remove the Z Combining District would not result in substantial conversion of agricultural lands and would not create physical conflicts with agricultural production. The total area typically required for an ADU does not represent a significant conversion of agricultural land.

Accessory Dwelling Units provide additional housing opportunities for properties not meeting the agricultural use thresholds.

Housing Element:

The current Housing Element (2014) includes Policy HE-3c, which allows for removal of the Z Combining District from agricultural parcels that are less than 10 acres in size, on a case by case basis, where appropriate.

**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.”*

As discussed above, the Board of Supervisors approved Ordinance No. 6285 on September 17, 2019, to remove of the Z Combining District from approximately 1,924 parcels countywide, including parcels over 10 acres in size, to facilitate the creation of affordable housing by allowing accessory dwellings where the General Plan and Zoning Code otherwise allow such development. Rezoning the project site to remove the Z Combining District meets the following objectives.

**Objective HE-3.1:** *Eliminate unneeded regulatory constraints to the production of affordable housing.*

**Objective HE-3.3:** *Increase opportunities for the production of affordable housing.*

Objective HE-3.1 seeks to eliminate unneeded regulatory constraints to the production of affordable housing and Objective HE-3.3 seeks to increase opportunities for the production of affordable housing. ADU 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. In addition, ADUs can help support small farms and operations by providing supplemental income and agricultural worker housing for farm families when their properties do not qualify for agricultural housing types. The California Department of Housing and Community Development consider ADUs as an innovative, affordable, effective options for adding housing.

**Program 16:** *On a parcel-by-parcel basis, the County will continue to process requests for removal of the ‘Z’ (Second Dwelling Unit Exclusion) Combining District restrictions on lots of less than 10 acres in agricultural zones that are not within water-scarce areas (Class 3 or 4) or flood prone areas, and where adequate sewage treatment capacity has been demonstrated. (Policy reference: HE-3c).*



General Plan Housing Element Implementation Program 16 (Review Z Combining District) directs staff to implement Policy HE-3c on a case-by-case basis and outlines the qualification criteria.

Public Safety Element:

**Goal PS-3:** *“Prevent unnecessary exposure of people and property to risks of damage or injury from wildland and structural fires.”*

The General Plan Public Safety Element establishes policies to protect the community from unreasonable risks from a variety of natural hazards including fire. To maintain consistency with the Public Safety Element, Fire Prevention Division staff conducted a site visit on May 5, 2023 and found no increased fire risk associated with the establishment of an ADU.

Land Use Policy for Land Extensive Agriculture

**Purpose and Definition.** *This category shall enhance and protect lands capable of and generally used for animal husbandry and the production of food, fiber, and plant materials. Soil and climate conditions typically result in relatively low production per acre of land. The objective in land extensive agricultural areas shall be to establish and maintain densities and parcel sizes that are conducive to continued agricultural production.*

Staff Analysis:

The General Plan land use designation for the project site is Land Extensive Agriculture (LEA), one dwelling unit for every 100 acres. Consistent with this density designation the site is 76.73 acres in size and is developed with one primary dwelling unit. The Land Use Element allows for residential uses in the LEA district in conformance with permitted densities. ADUs do not count toward a parcel’s allowed density; therefore, the addition of an ADU on this parcel would be consistent with its allowed density.

The General Plan provides for various types of agriculture-related housing units in areas designated for agricultural use. The Zoning Ordinance limits the number of additional agriculture-related housing units available in agricultural zoning districts on parcels where an ADU has been established. Currently there is no existing agricultural use on the parcel and does not meet the agricultural use thresholds to allow for an agricultural employee dwelling unit.

The subject parcel was not included in the Ordinance No. 6285 countywide “Z” removal effort because the site did not pass the screening criteria for removal. Parcels in waiver prohibition areas were not included in the countywide legislative proposal due to the differing site-specific environmental and regulatory constraints in the various waiver prohibition areas. Parcels in waiver prohibition areas would continue to be considered on a case-by-case basis. Most waiver prohibition areas are characterized by clusters of small parcels without the ability to provide adequate setbacks for septic systems to neighboring wells. That is not the case for the subject parcel, which is a 76.73-acre parcel surrounded by parcels of 1 acre to 380 acres in size.

In addition to this, Permit Sonoma Fire Prevention staff conducted a site visit and made a no risk determination for an ADU on the proposed site.

Rezoning the parcel to remove the Z Combining district, increases opportunities and removes regulatory barriers which acts as constraints to the production of affordable housing. The parcel no longer meets the minimum criteria thresholds to allow for an agricultural employee dwelling unit on site and the property owner has no future plans for agricultural uses on site. By allowing an ADU on the parcel, the property owner may provide



housing opportunities that may not otherwise be available through an agricultural dwelling unit. The ADU could be made available to family members, rented or provided as housing for local farmworkers. The ADU may not be used operated as short-term Vacation Rental or vacation rentals (less than 30 days at a time).

### **Zoning Consistency**

#### Land Extensive Agriculture Zoning District

##### *Permitted Uses*

ADUs are a permitted use in the LEA district (Sec. 26-06-030), subject to the regulations in Section 26-88-060 (Accessory Dwelling Units). The ADU will be evaluated ministerially for compliance with all applicable development standards when a building permit application is submitted. Rezoning the parcel to remove the Z overlay allows the property owner to apply to construct an ADU in a zone where an ADU is otherwise permitted.

The proposed Z removal would allow for additional housing potential on the site that could be made available to family members, rented, or provided as housing for local farmworkers.

##### Accessory Dwelling Units

ADUs are ministerially permitted in zoning districts that allow single-family or multi-family dwellings, in compliance with Government Code § 65852.2, the requirements of the Sec. 26-88-060, and all other requirements of the applicable zoning district in which an ADU is permitted. ADUs and Junior ADUs do not count towards the site’s density limits.

ADUs count towards the number of agricultural dwelling units permitted on site. Section 26-88-060 (c) (2) states that on agricultural zoning districts, including LEA zoning, ADUs are permitted in conjunction with a primary residence, except where a lot is eligible for one (1) or more agricultural dwelling units and an application has been filed for an ADU, that a lot shall be eligible for one (1) fewer agricultural units. ADUs count towards the number of agricultural dwelling units permitted on site.

Agricultural dwelling units are used to house full-time agricultural employees. Multiple units may be allowed on a single property, provided the onsite agriculture operation meets the agricultural use thresholds. As provided by Government Code § 65852.2, as a matter of state law ADUs do not exceed the allowable density for the lot on which the ADU is located, and are deemed consistent with the General Plan and zoning for the lot.

The parcel allows for one ADU and is subject to the development criteria established by the zoning district. The parcel does not qualify for an agricultural employee dwelling unit on site.

##### Z Accessory Dwelling Unit Exclusion Combining District

The purpose of Z Combining District is to provide for the exclusion of accessory dwelling units in areas that meet the following criteria found in Article 76 of the Sonoma County Code:

1. *Areas where there is an inadequate supply of water for drinking or firefighting purposes,*
2. *Areas where there are inadequate sewer services or danger of groundwater contamination,*
3. *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*
4. *Areas where, because of topography, access, or vegetation, there is a significant fire hazard.*





Applications to remove the Z Combining District must not meet the criteria for inclusion. Each of these criteria is evaluated below:

- a) *Water Supply.* The Z Combining District was not originally applied to the subject parcel for reasons related to water supply. The parcel is located in a Class 2 Groundwater Availability Area, which indicates a major natural recharge area. The project site has a finished well permit (WEL99-0084).
- b) *Wastewater Disposal.* The Z Combining District was not applied to the subject parcel for reasons related to inadequate wastewater disposal. The parcel and the development facilitated by the project would be served by a code compliant septic system.

The subject parcel is located in the Petaluma Nitrate Waiver Prohibition Area, one of several areas in Sonoma County designated as waiver prohibition areas, where variances or waivers to septic development standards (per Section 18 of the Sonoma County Onsite Wastewater Treatment Systems Manual) are not allowed, or where there are special standards for construction of wells or septic systems. Special standards required in the Petaluma Nitrate Waiver Prohibition Area were established by Ordinances 2607 (1980) and 3019 (1982), following the discovery of serious nitrate contamination in groundwater in the area. Those standards include wet weather groundwater determination and percolation testing for all septic systems, and minimum annular seals of at least 100 feet for water wells. The existing septic system complies with these standards, resulting in no risk of groundwater contamination effecting this project.

- c) *Traffic Hazards.* The Z Combining District was not originally applied to the subject parcel for reasons related to traffic hazards. The project site is located on Middle Two Rock Road, in a lightly populated agricultural area. The addition of an accessory dwelling unit would not contribute to existing traffic hazards or increase the burden on heavily impacted streets, roads, or highways in the area.
- d) *Fire Hazards.* The Z Combining District was not originally applied to the subject parcel for reasons related to fire hazard. The parcel is located in a Moderate Fire Hazard Severity Zone as established by the General Plan Safety Element (Figure PS-1g). Permit Sonoma Fire Prevention staff visited the project site and determined that the establishment of an ADU would not increase the fire risk.

Riparian Corridor

The purposed of the Riparian Corridor (RC) combining zone is to protect biotic resource communities, including critical habitat areas within and along riparian corridors, for their habitat and environmental value, and to implement the provisions of the General Plan Open Space and Resource Conservation and Water Resources Elements. These provisions are intended to protect and enhance riparian corridors and functions along designated streams, balancing the need for agricultural production, urban development, timber and mining operations, and other land uses with the preservation of riparian vegetation, protection of water resources, floodplain management, wildlife habitat and movement, stream shade, fisheries, water quality, channel stability, groundwater recharge, opportunities for recreation, education and aesthetic appreciation and other riparian functions and value

A small portion of the parcel is located in close proximity to a designated blue line stream that feeds into Laguna Lake, located approximately 2 miles south of the project site. This blue line stream has a 50-foot setback from the top of bank to structures and 25 feet for agricultural development.



ADUs are required to observe applicable setbacks of the Riparian Corridor (RC) Combining District, as provided in Article 65 of Sonoma County Code. ADUs proposed within the RC setback will not be considered complete for processing until the applicable permit for development within the RC setback is obtained.

### ***Area and Specific Plan Consistency***

#### ***Petaluma Dairy Belt Plan***

The subject parcel is in the area governed by the Petaluma Dairy Belt Area Plan, which designates the parcel as Land Extensive Agriculture—a land use category dominated by agricultural uses and residential uses related to the agricultural economy.

The Area Plan has a policy to “discourage residential use in agricultural areas unless the residential use can be shown not to conflict with agriculture.” There is no evidence that removal of the Z combining district on the subject property would conflict with the surrounding agriculture uses and the subject property is not currently in agricultural use. The subject parcel is surrounded by parcels that are between 1 and 300 acres. The County’s Right to Farm Ordinance ensures the right of farmers to conduct agricultural activity, subject to appropriate health and safety standards, and applies to all areas designated with agricultural land use categories, including the subject parcel.

Additionally, Area Plan housing policies guide residential development so that “people of low or moderate income are not excluded from rural living.” Rezoning the parcel to remove the Z Combining district, increases opportunities and removes regulatory barriers which acts as constraints to the production of affordable housing. The parcel does not meet the minimum criteria thresholds to allow for an agricultural employee dwelling unit on site and the property owner has no future plans for agricultural uses on site. By allowing an ADU on the parcel, the property owner may provide housing opportunities that may not otherwise be available through an agricultural dwelling unit. The ADU could be made available to family members, rented or provided as housing for local farmworkers. The ADU may not be used operated as short-term Vacation Rental or vacation rentals (less than 30 days at a time).

### ***Environmental Analysis***

The project is exempt from the California Environmental Quality Act, pursuant to:

1. Public Resources Code section 21080.17 and CEQA Guidelines § 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; and,
2. CEQA Guidelines Section 15301, Existing Facilities, because it provides for negligible or no expansion of the use; and,
3. 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.

## **NEIGHBORHOOD/PUBLIC COMMENTS**

None received.



## **RECOMMENDATIONS**

### ***Preceding Review Authority Recommendation***

N/A

### ***Staff Recommendation***

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

## **ATTACHMENTS**

1. Resolution
2. Proposal Statement
3. Site Plan
4. Vicinity Map
5. General Plan Land Use Map
6. Zoning Map
7. Draft Ordinance
8. Sectional District Map