



## **Planning Commission Staff Report - Hearing on August 18, 2022**

### **County of Ventura • Resource Management Agency**

800 S. Victoria Avenue, Ventura, CA 93009-1740 • (805) 654-2478 • [www.vcrma.org/divisions/planning](http://www.vcrma.org/divisions/planning)

**SUBJECT:** Public Hearing to Consider County-Initiated Amendments to Articles 2, 5, 7, 8, and 11 of the Ventura County Non-Coastal Zoning Ordinance to Amend Regulations for Accessory Dwelling Units and to Add Regulations for Junior Accessory Dwelling Units Consistent with Government Code Sections 65852.2 and 65852.22; and to Consider a Finding that the Project is Exempt from the California Environmental Quality Act Pursuant to Public Resources Code Section 21080.17 (PL20-0023)

#### **A. PROJECT INFORMATION**

##### **1. Applicant:**

County of Ventura, 800 S. Victoria Avenue, Ventura, California, 93009.

##### **2. Location:**

The proposed amendments to the Ventura County Non-Coastal Zoning Ordinance (NCZO) relating to accessory dwelling units (ADUs) and junior accessory dwelling units (JADUs) would apply to non-coastal parcels in the unincorporated county, as specified in the proposed ordinance (Exhibit 5), zoned: Single-Family Residential (R1); Two-Family Residential (R2); Residential (RES); Residential Planned Development (RPD); Residential Mixed Use (R/MU); Residential High Density (RHD); Rural Agricultural (RA); Rural Exclusive (RE); Single-Family Estate (RO); Commercial Planned Development within a Community Business District overlay zone (CPD/CBD); Open Space (OS); Agricultural Exclusive (AE); and Timberland Preserve (TP). See Exhibit 2 for location maps showing applicable areas for ADUs and JADUs.

##### **3. Request:**

Planning Division staff requests that your Commission review this staff report and its attachments and adopt a resolution (Exhibit 3) recommending that the Board of Supervisors (Board) adopt the staff recommended actions stated in Section F of this report, which include approval of the proposed text amendments to the NCZO to amend regulations for ADUs and add regulations for JADUs ("Proposed Ordinance") (Exhibit 5); and find that the adoption of the Proposed Ordinance is exempt from CEQA review pursuant to Public Resources Code section 21080.17.

##### **4. Review/Decision-Making Authority:**

Under the NCZO and state law, your Commission is required to review, conduct a public hearing on, consider and make recommendations to the Board regarding the Proposed Ordinance. The Board, at a subsequent public hearing, will consider your Commission's recommendations and decide whether to adopt, not adopt or adopt with modifications the Proposed Ordinance.

## 5. Background:

The Legislature has declared that California faces a severe housing crisis and is failing to meet housing demands, particularly for lower and middle-income earners (Gov. Code, § 65852.150, subdivisions (a)(5) and (a)(6)). Lack of housing has caused increased housing costs, particularly for renters. To increase housing development, several laws have been passed to increase the availability of ADUs and JADUs, which are *“an essential component of California's housing supply.”* (Gov. Code, § 65852.150(a)(8), emphasis added.) ADUs typically cost less to construct than other types of housing, largely because they do not require paying for land or major new infrastructure. Additionally, ADUs *“provide housing for family members, students, the elderly, in-home health care providers, the disabled, and others, at below-market prices within existing neighborhoods.”* (Gov. Code, §65852.150(a)(2), emphasis added.)

Every eight years, all cities and counties in California must update their housing elements to include adequate zoning and programs to accommodate housing production. The state, through metropolitan planning organizations, assigns each jurisdiction with a number of housing units that must be adequately zoned and planned in their housing elements. The Southern California Association of Governments (SCAG) is the metropolitan planning organization for the County of Ventura that assigns housing units for the county unincorporated area through a process called the Regional Housing Needs Assessment (RHNA). The current RHNA for the County, for the 6<sup>th</sup> Housing Element cycle (from 2021-2029), is to achieve 1,262 housing units in the county unincorporated area by 2029.

The County's 2021-2029 Housing Element identifies ADUs as an integral housing type for meeting the County's RHNA allocation for low-income housing units. Due to the changing ADU laws which have made it easier to develop this housing type, the second largest percentage of housing developed in the last RHNA cycle (from 2013-2021) consisted of ADUs (after single-family residences). Based on this, the housing inventory in the recently adopted 2021-2029 Housing Element assumes that about 44 percent (i.e., 560 units) of the overall RHNA for the 6<sup>th</sup> cycle will be addressed by the development of ADUs in the unincorporated county. A 2020 study conducted by SCAG and certified by the California Department of Housing and Community Development (HCD)<sup>1</sup> concluded that 46 percent of ADUs in Ventura County were affordable to lower-income households. Based on this, 258 of the 560 ADUs in the 2021-2029 Housing Element are allocated as low-income units (almost half of all low-income units expected to be developed in the next eight years). Therefore, ADUs are anticipated to be utilized as one of the affordable housing options in the unincorporated county.

As explained in more detail below, consistent with state law, ADUs may be created on lots with an existing or proposed single-family or multifamily dwelling, and may be created in the following forms:

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<sup>1</sup> SCAG Regional Accessory Dwelling Unit Affordability Analysis, updated April 2021:  
[scag.ca.gov/sites/main/files/file-attachments/adu\\_affordability\\_analysis\\_120120v2.pdf?1606868527](https://scag.ca.gov/sites/main/files/file-attachments/adu_affordability_analysis_120120v2.pdf?1606868527)

- 1) Detached. The ADU is separated from the primary residential structure.
- 2) Attached. The ADU is attached to the primary residential structure. An attached ADU includes the conversion of existing partially enclosed spaces (such as a covered patio) to an ADU that is attached to the primary residential structure.
- 3) Space within a Primary Residential Structure. The ADU is created within the space (e.g., primary bedroom, attached garage, storage area, or similar use) of an existing or proposed primary residential structure.
- 4) Space within an Existing Accessory Structure. The ADU is created within the space of an existing accessory structure that is located on the lot of the primary residence.

### ***History of Accessory Dwelling Units in the County***

In 2003, the County adopted a Second Dwelling Unit Ordinance that identified permitting and development standards for second units on properties that met certain criteria consistent with the requirements of Government Code section 65852.2. “Second dwelling units” were the precursor to what are now identified as “accessory dwelling units”. Some of the key legislative changes relating to “accessory dwelling units” are summarized below.

#### **2017/18 ADU Laws**

In 2017 and 2018, various legislative amendments to Government Code section 65852.2, the primary statute governing ADUs, took effect to promote the construction of more ADUs. These included Assembly Bill (AB) 2299, Senate Bill (SB) 1069, AB 494 and SB 229 (collectively the “2017/18 ADU Laws”). Among other changes, these amendments replaced the nomenclature “second dwelling unit” with “accessory dwelling unit.”

The 2017/18 ADU Laws reduced barriers for the construction of ADUs by requiring ministerial approval of ADUs and establishing the maximum standards that local agencies could use to evaluate proposed ADUs. While the 2017/18 ADU Laws significantly limited a local agency’s ability to restrict or prohibit ADUs, the laws still allowed local agencies to designate areas where ADUs could be prohibited or restricted based on the adequacy of water and sewer services and the impact of ADUs on traffic flow and public safety.

The 2017/18 ADU Laws also provided a path for approval of certain qualifying ADUs that local agencies had to allow with only a building permit, that would not be subject to local development standards and were exempt from any designated impact areas; the County previously referred to these mandatory ADUs as “Mandatory Interior ADUs”. All other ADUs were required to be approved ministerially, and in the County that meant all other ADUs were permitted through a ministerial zoning clearance. Finally, the 2017/18 ADU Laws also authorized local jurisdictions to allow, by ordinance, the creation of JADUs as an optional form of additional housing in single-family residential zones.

#### **2018 ADU Ordinance**

In response to the 2017/18 ADU Laws, the County amended the NCZO and Coastal Zoning Ordinance in 2018 to establish development standards for ADUs consistent

with the statutory requirements then in effect (2018 ADU Ordinance). Among other changes, the 2018 ADU Ordinance:

- Reclassified Second Dwelling Units as Accessory Dwelling Units;
- Identified the Mandatory Interior ADU standards;
- Established size requirements for ADUs and minimum lot sizes for ADUs;
- Established parking requirements for ADUs; and
- Established an owner occupancy requirement for ADUs.

The 2018 ADU Ordinance retained the Arroyo Santa Rosa/Tierra Rejada Groundwater Quality Impact Area that restricted the size of ADUs based on nitrates in the ground water as well as the Ojai Traffic Impact Area that restricted the size of ADUs based on traffic flow and public safety. The 2018 ADU Ordinance did not contain provisions authorizing JADUs.

### **New ADU Laws**

Since the 2018 ADU Ordinance was adopted, many additional state laws have been enacted to further reduce barriers to the development and use of ADUs and JADUs including, for example: AB 1584 (2021), AB 345 (2021), AB 3182 (2020), SB 1030 (2020), SB 1371 (2020), AB 881 (2019), AB 68 (2019), SB 13 (2019), AB 587 (2019), AB 670 (2019), and AB 671 (2019) (collectively, the “New ADU Laws”). The New ADU Laws require substantial revisions to the NCZO to bring it into conformity. The primary changes made by the New ADU Laws are summarized briefly below and included in Exhibit 6. Exhibit 7 includes the legislative text for Government Code sections 65852.2 (ADU) and 65852.22 (JADU).

The New ADU Laws expanded the types of mandatory ADUs that must be ministerially approved with a building permit in residential and mixed-use zones to include:

- Up to one ADU and one JADU per lot with a proposed or existing single-family dwelling, provided that the ADU is within the proposed or existing space of the single-family dwelling or within the existing space of an accessory structure and that certain additional requirements are satisfied;
- Up to one detached, new construction ADU and one JADU per lot with a proposed or existing single-family dwelling;
- Multiple ADUs within the portions of existing multifamily dwellings that are not used as livable space;
- Up to two detached ADUs per lot with an existing multifamily dwelling; and
- JADUs that meet the requirements of Government Code section 65852.22.

The New ADU Laws impose additional requirements and restrictions on the ability to regulate ADUs, including, but not limited, to the following:

- No minimum lot size requirement for ADUs;
- No owner occupancy requirements for ADUs permitted between January 1, 2020 to January 1, 2025;
- Rental terms for ADUs must exceed 30 days;
- An ADU may not be sold or otherwise conveyed separately from the primary residence, except as provided in Government Code section 65852.26;

- Maximum size of the ADU cannot be less than 850 square feet, or less than 1,000 square feet if the ADU contains more than one bedroom;
- No parking requirements for certain qualifying ADUs including:
  - ADUs located within one-half mile walking distance of public transit;
  - ADUs located within an architecturally and historically significant historic district;
  - ADUs created as part of the proposed or existing primary residence or accessory structure;
  - When on-street parking permits are required but not offered to the occupant of the accessory dwelling unit; or
  - When there is a car share vehicle located within one block of the ADU.
- Creates a limited exception to local development standards (e.g., lot coverage or open space requirements) that do not permit at least an 800 square foot ADU, up to 16 feet in height with four-foot side and rear setbacks to be constructed in compliance with other development standards;
- JADUs meeting the requirements of Government Code section 65852.22 must be allowed in single-family residential zones;
- A JADU may not be sold or otherwise conveyed separately from the primary residence; and
- Unlike ADUs, JADUs must comply with owner-occupancy requirements (e.g., the owner must occupy the JADU or the remaining portion of the single-family dwelling, with limited exceptions).

The New ADU Laws also limit the ability of local jurisdictions to restrict or prohibit ADUs in designated areas based on the adequacy of water and sewer services and impacts on traffic flow and public safety (i.e., “impact areas”). (Gov. Code, § 65852.2(a)(1)(B).) While the ADU law does not require local jurisdictions to make specific findings in designating impact areas where ADUs would be restricted or prohibited, HCD, which is responsible for reviewing local ADU ordinances for compliance with state law and is statutorily authorized to adopt guidelines to supplement or clarify the “terms, references, and standards” of the state ADU law, has indicated that it would require detailed findings of fact to support the designation of any impact areas and to explain why any prohibition or restriction on ADU development within an impact area is consistent with Government Code section 65852.2(a)(1)(A).

See Exhibit 6 for additional information regarding the 2017/18 ADU Laws, the 2018 ADU Ordinance, and the New ADU Laws.

## **6. Summary of Proposed Amendments to the NCZO:**

Due to the comprehensive statutory changes made by the New ADU Laws, the Proposed Ordinance includes amendments to Articles 2, 5, 7, 8, and 11 of the NCZO. The majority of the amendments are included in Article 7, where the current Section 8107-1.7 is proposed to be reorganized and rewritten to include the requirements of the New ADU Laws while retaining certain provisions of the County’s current 2018 ADU Ordinance that are unaffected by the New ADU Laws.

The requirements of the New ADU Laws are primarily addressed in the following three subsections of Section 8107-1.7:

- **Section 8017-1.7.4** governs ADUs and JADUs that must be ministerially approved with a building permit pursuant to Government Code section 65852.2(e) (“Building Permit ADUs and JADUs”);
- **Section 8107-1.7.5** governs ADUs that do not qualify as Building Permit ADUs. Unlike Building Permit ADUs, ADUs subject to Section 8107-1.7.5 are approved ministerially with a zoning clearance and are subject to the development standards set forth in Section 8107-1.7.5. (Building Permit ADUs and JADUs approved under Section 8107-1.7.4 are not subject to the development standards in Section 8107-1.7.5); and
- **Section 8107-1.7.6** addresses specific requirements for JADUs, consistent with the requirements of Government Code section 65852.22. JADUs that meet the applicable criteria are approved ministerially with a building permit.

The following discussion elaborates on the intent, applicability, and requirements of these three subsections to assist decision-makers and the community to understand the proposed regulations, which are intended to facilitate the development of ADUs and JADUs as an affordable housing option consistent with the County’s Housing Element and state law.

***(a) Section 8107-1.7.4 - ADUs and JADUs Allowed by Building Permit***

As noted above, the New ADU Laws vastly expanded the types of ADUs that may be approved with a building permit and that are not subject to the development standards of Section 8107-1.7.5 (i.e., Building Permit ADUs and JADUs). While the 2017/18 ADU Laws only required ADUs that met the criteria of a Mandatory Interior ADU be qualified for approval with a building permit, the New ADU Laws now include four categories of Building Permit ADUs and JADUs. (Gov. Code, § 65852.2(e)(1)(A) through (D).) As a result, staff anticipates that applications for Building Permit ADUs and JADUs may substantially increase, which will in turn help the County meet the 560 ADUs identified in the County’s RHNA and Housing Element.

The four subsections within Section 8107-1.7.4 of the Proposed Ordinance ((a) through (d)) implement the statutorily mandated approval of Building Permit ADUs and JADUs. Sections 8107-1.7.4(a) and (b) apply to lots in residential and mixed-use zones with an existing or proposed single-family dwelling, whereas Sections 8107-1.7.4(c) and (d) apply to lots with existing multifamily dwellings.

In addition to other criteria, Building Permit ADUs and JADUs must:

- Be located on lots within a residential or mixed-use zone (such as lots zoned R1, R2, RES, RPD, R/MU, RHD, RA, RE, RO, or CPD/CBD). This excludes lots that are zoned AE, OS, and TP, as well as the industrial zones and commercial zones (with the exception of the CPD/CBD zone);
- Meet Building Code and Fire Code standards; and
- Satisfy the applicable requirements of Section 8107-1.7.4(a), (b), (c), or (d).

**Building Permit ADUs and JADUs - Lots with Single-Family Dwellings (Sections 1.7.4(a) and (b))**

As mentioned above, Sections 8107-1.7.4(a) and (b) allow for Building Permit ADUs on lots with a proposed or existing single-family dwelling in accordance with Government Code section 65852.2(e)(1)(A) and (B).

**Category 1: Section 8107-1.7.4(a) – Within the Space of Single-Family Dwellings and Accessory Structures.** (Gov. Code, § 65852.2(e)(1)(A).)

The criteria for approval by building permit under this subsection are as follows:

- 1) The lot must be in one of the following residential or mixed-use zone classifications: R1; R2; RES; RPD; R/MU; RA; RE; RO; or CPD/CBD.
- 2) The ADU or JADU is created within an existing or proposed single-family dwelling and must have its own exterior access, or the ADU is created within an existing (legally permitted or legal nonconforming) accessory structure.
  - a. There is no size limitation on the converted structure or the size of the ADU within the converted structure.
  - b. The accessory structure may be attached or detached from the single-family residence.
  - c. The accessory structure may include a maximum expansion of 150 square feet for accommodating ingress and egress to the ADU. This expansion is not available for an ADU or JADU created within an existing single-family dwelling.
- 3) Side and rear setbacks must comply with Building Code and Fire Code requirements.
- 4) A JADU must comply with Government Code section 65852.22 and Section 8107-1.7.6 which include specific requirements for JADUs.

**Category 2: Section 8107-1.7.4(b) – New Detached ADU with an Existing or Proposed Single-Family Dwelling** (Gov. Code, §65852.2(e)(1)(B))

The criteria for approval by building permit under this subsection are as follows:

- 1) The lot is in a Residential or Mixed-Use Zone as specified in Category 1 above.
- 2) The lot has an existing or proposed single-family dwelling.
- 3) The ADU is detached from the single-family dwelling.
- 4) The ADU is a new construction ADU (not a conversion of accessory structure).
- 5) The ADU has side and rear setbacks that are at least four feet.
- 6) Maximum building height of the ADU is 16 feet above grade.
- 7) The ADU does not exceed 850 square feet.
- 8) The detached ADU may be combined with a JADU that meets the requirements of Government Code section 65852.22 and Section 8107-1.7.6.

Government Code section 65852.2(e)(1)(B)(i) authorizes a local agency to impose certain conditions on detached new construction ADUs that must be ministerially approved with a building permit. The law specifically allows a locally agency to impose a height limit of 16 feet and a total floor area limitation of not more than 800 square feet for such ADUs.

As reflected in the criteria listed above, the Proposed Ordinance includes a 16-foot height limitation as well as a total floor area limitation of 850 square feet. While Government Code section 65852.2(e)(1)(B)(i) authorizes a more restrictive total floor area limitation of 800 square feet, staff recommends that the size of detached new construction ADUs pursuant to Section 8107-1.7.4(b) be allowed up to 850 square feet. Local agencies may adopt less restrictive requirements for the creation of ADUs. (Gov. Code, § 65852.2(g).) Because other provisions of Government Code section 65852.2 require local agencies allow certain ADUs up to 850 square feet, staff determined that having a consistent 850 square foot size limitation for certain qualifying ADUs would be easier to administer.

Since allowing a detached new construction ADU of 850 square feet is less restrictive than imposing an 800 square feet limitation, increasing the maximum square footage to 850 square feet is permissible.

**Building Permit ADUs – Lots with Multifamily Dwellings (Sections 8107-1.7.4(c) and (d))**

The next two sections – Sections 8107-1.7.4(c) and (d) – allow for Building Permit ADUs on lots with multifamily dwellings in accordance with Government Code section 65852.2(e)(1)(C) and (D). Section 8107-1.7.4(c) allows for ADUs to be created within the portions of existing multifamily dwellings that are not used as livable space (e.g., storage rooms, boiler rooms, passageways, attics). Section 8107-1.7.4(d) allows for the construction of up to two detached ADUs on lots with multifamily dwellings.

Consistent with guidance published by HCD in the July 2022 ADU Handbook<sup>2</sup>, applicants may combine the options in Sections 8107-1.7.4(c) and (d) on lots with multifamily dwellings. For example, an applicant may create an ADU by converting existing non-livable space within a multifamily dwelling and create up to two detached ADUs on the same lot, as long as the criteria in Sections 8107-1.7.4(c) and (d) are satisfied. Further, based on guidance in the ADU Handbook, Section 8107-1.7.4(c)(2)(b) provides that, for lots with mixed-uses, the non-livable space used to create an ADU within a multifamily dwelling shall be limited to the residential areas, and shall not include the areas used for commercial or other non-residential uses.

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<sup>2</sup> Accessory Dwelling Unit Handbook, July 2022, California Department of Housing and Community Development, [www.hcd.ca.gov/sites/default/files/2022-08/ADUHandbookUpdate.pdf](http://www.hcd.ca.gov/sites/default/files/2022-08/ADUHandbookUpdate.pdf)



*Category 3: Section 8107-1.7.4(c) – ADUs within Existing Multifamily Dwelling Structures* (Gov. Code, § 65852.2 (e)(1)(C))

The criteria for approval by building permit under this subsection are as follows:

- 1) The lot must be in the RHD zone, or in one of the other residential or mixed-use zones listed previously above (i.e., R1, R2, RES, RPD, R/MU, RA, RE, RO or CPD/CBD).
- 2) The ADUs must be created within the portions of the existing multifamily dwelling structure that are not used as livable space including, but not limited to, storage rooms, boiler rooms, passageways, attics, basements, or garages. The multifamily dwelling may be legal nonconforming.
- 3) An applicant could not build an ADU if there was no existing non-livable space within a multifamily dwelling structure.
- 4) The number of ADUs that may be created on a lot pursuant to Section 8107-1.7.4(c) shall be at least one or the number of ADUs equal to up to 25 percent of the existing multifamily dwelling units, whichever is greater. For example, a lot with a duplex (i.e., two units) may develop up to one ADU, while a larger multifamily dwelling with eight units may develop up to two ADUs.
- 5) For lots with mixed-uses, the non-livable space used to create an ADU shall be limited to the residential areas and shall not include the areas used for commercial or other non-residential activities. Parking and storage areas for non-residential uses are also excluded from potential ADU development.

*Category 4: Section 8107-1.7.4(d) – Detached ADUs with Existing Multifamily Dwelling Structures* (Gov. Code, § 65852.2(e)(1)(D))

The criteria for approval by building permit under this subsection are as follows:

- 1) The lot must be in the RHD zone, or in one of the other residential or mixed-use zones listed above (R1, R2, RES, RPD, R/MU, RA, RE, RO, or CPD/CBD).
- 2) The lot must have an existing multifamily dwelling structure. The multifamily dwelling may be legal nonconforming.
- 3) Up to two detached ADUs are allowed either through the conversion of an existing structure or new construction.
- 4) The ADU's side and rear setbacks must be at least four feet.
- 5) Maximum building height of the ADU is 16 feet above grade.
- 6) New construction ADUs may not exceed 850 square feet.

Government Code section 65852.2(e)(1)(D) does not address size limitations for detached ADUs on lots with multifamily dwellings. However, HCD has indicated in some of its ADU ordinance review letters to local agencies that a local agency may impose a size limitation on new construction, detached ADUs on lots with existing multifamily dwellings, but may not impose a size limitation on the conversion of existing detached structures to ADUs. (See Government Code § 65852.2(e)(1)(D).) Staff

proposes including a size limitation of 850 square feet for a detached new construction ADU with an existing multifamily dwelling, as set forth in Section 8107-1.7.4(d)(3) of the Proposed Ordinance. Detached ADUs created by converting existing detached structures, on the other hand, would not be subject to the 850 square foot size limitation.

**Sections 8107-1.7.4(e) and (f)**

These sections apply to all Building Permit ADU and JADUs under Sections 8107-1.7.4(a) through (d) above and make it clear that only a building permit is required for ADUs that qualify under Sections 8107-1.7.4(a) through (d), and that the development standards of section 8107-1.7.5 do not apply to Building Permit ADUs.

***(b) Section 8107-1.7.5 - Development Standards for ADUs Not Authorized under Section 8107-1.7.4***

ADUs that do not meet the standards of Section 8107-1.7.4 for approval with a building permit may be approved by ministerial zoning clearance if the standards in Section 8107-1.7.5 are met. The authority for the County to impose development standards on ADUs that do not qualify for approval with a building permit is set forth in Government Code section 65852.2(a) ("Subdivision (a) Development Standards"). The Subdivision (a) Development Standards establish the maximum parameters that local agencies may use in developing and applying local development standards for ADUs; a local ADU ordinance may not impose special permitting requirements or development standards for ADUs that are more restrictive than those authorized by the Subdivision (a) Development Standards. However, as previously noted, local agencies may adopt less restrictive standards for ADUs consistent with Government Code section 65852.2(g).

Section 8107-1.7.5 establishes the following development standards for approval by zoning clearance in compliance with the Subdivision (a) Development Standards:

- 1) ADUs must meet Building Code and Fire Code requirements and other applicable zoning standards that are not inconsistent with the standards in Section 8107-1.7.5.
- 2) The lot must be located within the residential or mixed-use zones listed above (including RHD), or the AE, OS, or TP zones. Lots in the AE, OS, or TP are not entitled to Building Permit ADUs because those zones are not residential or mixed-use zones, thus, Section 8107-1.7.5 is the only option for lots located in AE, OS, and TP. (Gov. Code, § 65852.2(a)(1)(D)(ii).) ADUs are not allowed on lots located in the commercial and industrial zones, with the exception of lots in the CPD/CBD zone, as those zones do not allow single-family or multifamily dwelling residential use.
- 3) The lot must either have an existing or proposed single-family dwelling or multifamily dwelling. (Gov. Code, § 65852.2(a)(1)(D)(ii))
- 4) One ADU and one JADU are allowed per lot if the applicable criteria of Section 8107-1.7.5, and 8107-1.7.6 for JADUs, are satisfied. Although a local agency may allow for additional ADUs, staff proposes a maximum of one ADU per lot. One

JADU may be allowed on the same lot if the requirements of Section 8107-1.7.6 are satisfied.

- 5) Parking requirements are limited by state law to no more than one off-street parking space per ADU. Off-street parking may be provided as tandem parking on a driveway and may encroach, with limitations, into the front and/or interior side setback. However, pursuant to Government Code section 65852.2(a)(1)(D)(x), no parking for an ADU is required if:
  - a. The ADU is within one-half mile walking distance of public transit (See Section 8107-1.7.2 for the statutory definition of “public transit”);
  - b. The ADU is located within an architecturally and historically significant historic district;
  - c. The ADU is part of the proposed or existing primary residence or an accessory structure. (This exemption from parking requirements may be vast reaching since it applies to all interior ADUs and all ADUs in accessory structures.);
  - d. When on-street parking permits are required but not offered to the occupants of the ADU; or
  - e. When there is a car share vehicle within one block of the ADU.

In addition, when a garage, carport, or covered parking structure is converted to an ADU or demolished to construct an ADU, those off-street parking spaces do not need to be replaced for the primary dwelling.

- 6) The Proposed Ordinance imposes a maximum height for an ADU of 16 feet above the grade, but the height may exceed 16 feet if the ADU is setback 20 feet from all property lines. In that case, the ADU may not exceed the maximum allowed building height requirement of the primary dwelling unit per the applicable zone. (Gov. Code, § 65852.2(e)(1)(B)(ii))
- 7) Government Code section 65852.2(a) authorizes local agencies to impose setback restrictions on ADUs, subject to several limitations. First, if any of the following are converted into an ADU, then no setback may be required: (a) an existing living area; (b) an accessory structure; or (c) a structure constructed in the same location and to the same dimensions as a demolished existing structure. Second, a setback of no more than four feet from the side and rear lot lines may be required for an attached or detached ADU. (Gov. Code, § (a)(1)(D)(vii).) The setback requirements in the Proposed Ordinance are consistent with state law.
- 8) There is no minimum lot size requirement. The New ADU Laws prohibit a local agency from establishing a minimum lot size requirement for ADUs and JADUs. (Gov. Code, § 65852.2(a)(1)(B)(i))
- 9) State law authorizes local agencies to adopt size standards for attached and detached ADUs subject to several statutory limitations. First, an ordinance cannot establish a minimum size that prohibits an efficiency unit. Second, the ordinance must allow at least an 850 square foot ADU for a one-bedroom ADU or efficiency unit, and at least a 1,000 square foot ADU if it provides more than one bedroom. (Gov. Code, § 65852.2(c)(2)). Staff’s Proposed Ordinance complies with these

requirements, and allows for larger ADUs on lots that are larger than 9,000 square feet as follows:

- a. Lots that are 9,000 square feet or less are allowed ADUs of up to 850 square feet if the ADU is a one bedroom or an efficiency unit, or ADUs of up to 1,000 square feet if the ADU provides more than one bedroom.
- b. Lots larger than 9,000 square feet, but less than 10 acres, may have ADUs up to 1,200 square feet
- c. Lots larger than 10 acres, may have ADUs up to 1,800 square feet.

The 2003 Second Dwelling Unit Ordinance, and thereafter, the 2018 ADU Ordinance established minimum lot size requirements and limited the number of allowable bedrooms.

Consistent with state law, the Proposed Ordinance does not impose a minimum lot size requirement for ADUs. However, the Proposed Ordinance does take lot size into account by allowing larger ADUs on lots that exceed 9,000 square feet or 10 acres in size. The Proposed Ordinance does not include any size limits based on the number of bedrooms. Because these standards promote greater flexibility and are less restrictive than the state requirements, the proposed size standards are permissible.

- 10) As noted above, Section 8107-1.7.4(a) allows certain ADUs in residential and mixed-use zones to be created within the space of a proposed or existing single-family dwelling, or within the existing space of an accessory structure, (i.e., Interior ADU) with approval of a building permit.

An Interior ADU that does not meet the standards of Section 8107-1.7.4 for approval with a building permit, including, for example, if the lot is zoned OS, AE or TP (i.e., not located in a residential or mixed-use zone), may nonetheless be allowed with a zoning clearance if the standards in section 8107-1.7.5(h) are met. Those standards include:

- a. The ADU is located within the space of an existing or proposed single-family dwelling (not allowed in an accessory structure).
- b. The ADU has independent exterior access and does not have internal access to the primary dwelling.
- c. The ADU must comply with the size standards in Section 8107-1.7.5(g). (This is unlike an Interior Building Permit ADU under Section 8107-1.7.4(a) which is not subject to size limitations.)
- d. The side and rear setbacks must comply with applicable Building and Fire Code requirements.

- 11) An accessory structure may be attached to an ADU only if the total floor area of the accessory structure and attached ADU combined does not exceed the allowable size of an ADU pursuant to Section 8107-1.7.5(g). This provision does not apply to ADUs built above a garage. Furthermore, the ADU may not have internal access to the accessory structure. These design standards are recommended to prevent the unauthorized expansion of the space within the

accessory structure to create larger ADUs than intended by the Proposed Ordinance.

- 12) Limited Exception to Development Standards ADU - Section 8107-1.7.5(j) of the Proposed Ordinance implements Government Code section 65852.2(c)(2)(C), which provides a limited exception to local development standards (e.g., lot coverage or open space requirements) that do not permit at least an 800 square foot ADU, up to 16 feet in height with four-foot side and rear setbacks to be constructed in compliance with all other development standards. This provision has the effect of overriding the application of a development standard if it would prevent the construction of an 800 square foot ADU, 16 feet in height with four-foot side and rear setbacks. For example, a property that has met the maximum allowable lot coverage may still construct an ADU of up to 800 square feet, even if it is inconsistent with lot coverage limitations. However, other applicable development standards still apply.

Staff proposes that this limited exception to development standards be expanded to allow an override of local development standards that do not permit at least an 850 square foot ADU (as opposed to an 800 square foot ADU) in order to have as much consistency as possible in the provisions of the Proposed Ordinance relating to the size of ADUs to facilitate implementation. As previously noted, state law permits local agencies to provide for less-restrictive standards than required under the ADU Laws.

**Relationship to County Impact Areas:**

As noted in the discussion regarding the New ADU Laws, HCD has provided some guidance regarding the ability of local agencies to limit ADU development in certain areas based on the adequacy of water and sewer service, and the impacts on traffic flow and public safety. In HCD's ADU Handbook, for example, HCD explains that "local governments may not preclude the creation of ADUs altogether, and any limitation should be accompanied by detailed findings of fact explaining why ADU limitations are required and consistent with these factors." HCD also informed County staff that these detailed findings of fact, would be subject to a high evidentiary bar if the restriction would prohibit ADUs in neighborhoods with existing residential uses.

While detailed findings of fact are not required by, or mentioned anywhere in, Government Code section 65852.2, HCD is authorized by law to adopt guidelines to implement uniform standards or criteria that supplement or clarify the standards set forth in Government Code section 65852.2. Local agencies must also submit their ADU ordinances to HCD within 60 days of adoption, after which HCD may review and submit written findings to the local agency as to whether the ordinance complies with state law. Additionally, state law requires the issuance of a building permit for an ADU or JADU that meets the criteria outlined above and in the Proposed Ordinance under Section 8107-1.7.4, even if the property is within an impact area.

Therefore, based on the guidance provided by HCD, the inclusion of the Arroyo Santa Rosa/Tierra Rejada Groundwater Quality Impact Area and the Ojai Traffic Impact Area were removed from the Proposed Ordinance as ADUs and JADUs must be approved with a building permit subject to the requirements of Section 8107-1.7.4 of the

Proposed Ordinance, and staff has not identified the detailed facts meeting HCD's high evidentiary bar to justify the continued inclusion of the impact areas. That said, all proposed ADUs (including any new ADUs proposed to be located in the previously identified impact areas) must meet Building Code and Fire Code requirements, which would require individual applicants to satisfy the necessary water supply, fire flow, wastewater and related health and safety requirements prior to the issuance of a building permit.

***(c) Section 8107-1.7.6 – JADU Requirements***

A JADU, as defined by Government Code section 65852.22, is "a dwelling unit that is no more than 500 square feet in size and contained entirely within an existing or proposed single-family dwelling. A JADU may include separate sanitation facilities, or may share sanitation facilities with the existing structure." JADUs are regulated primarily by Government Code section 65852.22 which establishes strict standards for JADUs. Section 8107-1.7.6 directly implements the state requirements.

As explained in Section A.5 of this staff report, the 2017/18 ADU Laws authorized local agencies to allow JADUs as an additional housing option, but did not mandate local agencies to do so. The County's 2018 ADU Ordinance did not include provisions for JADUs.

The New ADU Laws, however, require local agencies to approve JADU applications with a building permit in single-family residential zones provided the JADU meets the requirements of Government Code section 65852.22. The following includes some of the prominent provisions of state law that are set forth in Section 8107-1.7.6 of the Proposed Ordinance pertaining to JADUs:

- 1) JADUs are only allowed in single-family residential zones which include: R1, R2, RES, RPD, RA, RE, or RO.
- 2) Only one JADU is allowed per lot and only within the walls of a proposed or existing single-family dwelling, which includes an attached garage. JADUs are not allowed in multifamily dwellings or accessory structures. JADUs are also prohibited if a lot has more than one single-family dwelling.
- 3) The JADU must have an efficiency kitchen that includes cooking facilities and a food preparation area and storage cabinets.
- 4) The JADU must have a separate entrance from the proposed or existing single-family dwelling, and is not required to have an internal connection to the single-family dwelling unless the JADU shares sanitation facilities with it.
- 5) The JADU must either include separate sanitation facilities or may share sanitation facilities with the single-family dwelling.
- 6) No additional parking is required for a JADU. However, if a JADU is created by the conversion of an attached garage, replacement parking for the single-family dwelling must be provided; replacement parking can be uncovered on-site, and located in the setbacks, with limitations.

***(d) Other Provisions in Section 8107-1.7***

Section 8107-1.7.2 of the Proposed Ordinance includes specific definitions that only apply to Section 8107-1.7. Six of the definitions are mandated by Government Code section 65852.2(j) and the other two were added to clarify the meaning of the terms “existing” and “total floor area” as used in the Proposed Ordinance and state law.

Section 8107-1.7.3 identifies the forms of ADUs that may be created as: (a) detached from the primary residential structure; (b) attached to the primary residential structure; (c) space within a primary residential structure; and (d) space within an existing accessory structure.

Section 8107-1.7.7 addresses application processing and general requirements for ADUs and JADUs, including certain requirements relating to rentals, owner occupancy and property transfers, as well as deed restrictions required to be recorded with the County Recorder’s office for both ADUs and JADUs.

In addition to the comprehensive amendments listed above, the Proposed Ordinance also includes various amendments to Articles 2, 5, 8, and 11 including: new and revised definitions for ADUs and JADUs (Section 8102-0); revisions to the use matrix (Section 8105-4) to address ADUs and JADUs; updates to the Table for Parking Space Requirements by Land Use in Section 8108-4.7; updating the applicable section reference in the cultural heritage provisions (Section 8107-37); and adding references to JADUs in the entitlement process and procedures (Section 8111-7.6).

Exhibits 4 and 5 include the complete text of the Proposed Ordinance in a legislative/strike-out version and clean format respectively.

**B. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) COMPLIANCE AND FINDINGS**

The Proposed Ordinance (Exhibit 5) is a “project” as defined by the California Environmental Quality Act (“CEQA”) (Public Resources Code, §21000 et seq.) and the CEQA Guidelines (California Code of Regulations, title 14, §15000 et seq.).

Planning Division staff has determined that the adoption of the Proposed Ordinance (Exhibit 5) is exempt from CEQA review pursuant to Public Resource Code section 21080.17, which provides, in pertinent part, that CEQA does not apply to the adoption of an ordinance to implement the provisions of Government Code section 65852.2. The proposed ordinance implements recent amendments to Government Code section 65852.2 establishing new requirements relating to the ministerial approval of ADU and JADU applications. On that basis, adoption of the ordinance is exempt from CEQA.

**C. NCZO AMENDMENT FINDINGS AND SUPPORTING EVIDENCE**

Section 8115-0 et seq. of the NCZO authorizes the Board to change or amend the zoning ordinance “*whenever the public health, safety, or general welfare, good zoning practice, and consistency with the General Plan justify such action...*” provided that the Board makes certain findings.

The Board's ability to make the required findings pursuant to section 8115-0 of the NCZO is evaluated below for your Commission's consideration in making its recommendations to the Board.

**1. The proposed amendment would not be detrimental to the public health, safety or general welfare.**

The Proposed Ordinance provides additional housing options for the development of ADUs and JADUs on certain properties in the non-coastal areas of the unincorporated county through a ministerial approval process. The proposed amendments provide a regulatory framework for the development of ADUs and JADUs, consistent with state law, that addresses public health, safety, and general welfare issues. The permitting and development standards included in the Proposed Ordinance are intended to ensure that new ADUs comply with all applicable Building and Fire Code requirements, and adhere to setback, height, and size requirements while promoting the development of additional housing. The Proposed Ordinance also ensures that the County is in compliance with applicable state laws, including Government Code sections 65852.2 and 65852.22, by having a ministerial permitting process for ADUs and JADUs consistent with state and local requirements. Based on the aforementioned 2020 SCAG study which classifies the development of ADUs as one of the affordable housing options in the unincorporated county, the Proposed Ordinance furthers the intent of the County's Housing Element for its 6th RHNA cycle to provide affordable housing options for the community in the unincorporated county.

Therefore, the Proposed Ordinance would not be detrimental to the public health, safety, and general welfare. Based on the above discussion, this finding can be made.

**2. The proposed amendment represents good zoning practice.**

The California housing crisis continues to affect unincorporated communities across all individual and family income levels. Proposing zoning standards which promote the development of ADUs while also ensuring such housing meets the applicable objective development standards helps address this local housing need. The Proposed Ordinance applies to areas that are zoned to allow single-family and/or multi-family dwelling residential uses with proposed or existing single-family or multifamily dwellings, and includes detailed standards for issuing permits for ADUs and JADUs that are consistent with state regulations, and the purpose of the underlying zoning districts.

Therefore, the Proposed Ordinance is consistent with good zoning practice. Based on the above discussion, this finding can be made.

**3. The proposed amendment is consistent with the Ventura County General Plan.**

Staff conducted a review of the goals and policies of the Ventura County General Plan (General Plan) and determined that the Proposed Ordinance is consistent. The Proposed Ordinance establishes certain permitting requirements and development standards for ADUs and JADUs and helps implement state law requirements that



support the implementation of the following General Plan Goals and Policies which promote development of ADUs and JADUs.

**Land Use and Community Character Element:**

The Proposed Ordinance is consistent with Goals LU-6, LU-10, and LU-11 and the related policies LU-6.3, LU-10.1, LU-10.2, and LU-11.7 in the Land Use and Community Character Element of the General Plan. Pursuant to Government Code section 65852.2, subdivision (a)(8), an ADU that meets state and local requirements shall not be considered to exceed the allowable density for the lot upon which it is located, and shall be deemed a residential use that is consistent with the existing general plan and zoning designation for the lot. The Proposed Ordinance is therefore consistent with the aforementioned General Plan goals and policies.

**Housing Element:**

The intent of the Housing Element is to provide affordable housing options for all income levels. New state requirements have a specific focus on affirmatively furthering fair housing for very low-, and low-income households, as reflected in the County's Housing Element.

The Proposed Ordinance will implement Goal HE-2 and related policy HE-2.6 of the Housing Element, which incentivizes and encourages the construction of ADUs and JADUs to provide suitable sites for housing development that can accommodate a range of housing by type, size, location, price and tenure to meet the requirements of the regional housing need allocation.

The Proposed Ordinance will also implement Goal HE-3 and related policies HE-3.5 and HE-3.10, which promote housing types for lower-income households that align with the rural and agricultural character, economy, and needs of Ventura County, such as ADUs, and encourages housing design that meets the needs of extended, multigenerational, and/or large families (e.g. room additions, ADUs, and JADUs) to reduce overcrowding and assist in maintaining the affordability of existing housing stock to increase special needs housing opportunities and supportive services for lower income households, seniors, persons with disabilities, persons with mental illness, large families with children, female-headed households, and people who are experiencing homelessness.

Additionally, the Proposed Ordinance is consistent with the following Housing Element Programs which promote the development of new ADUs and JADUs by requiring County staff to develop easier and streamlined permitting procedures for additional housing units, and to maintain housing stock:

Program HE-C - ADU Homeowner Tools: County staff is in the process of preparing informational brochures and handouts that will guide property owners to develop the various options for ADUs and JADUs along with a summary of the development standards and the permit processing requirements, which will be posted online after the adoption of the ordinance.

Program HE-J - Compliance with State Housing Laws and PD Permit Monitoring: The Proposed Ordinance would amend the NCZO to be in compliance with the New ADU Laws and identifies the development standards and ministerial permitting requirements for ADUs and JADUs. Additionally, staff will be returning to your Commission and to the Board of Supervisors with proposed amendments to the Coastal Zoning Ordinance to update the permitting and development standards for ADUs in the coastal zones consistent with the New ADU Laws.

Program HE-T - Publish Clear Permit Approval Procedures: The Proposed Ordinance presents the New ADU Laws in a format that clearly identifies the development standards and ministerial permitting requirements for ADUs and JADUs. Additionally, staff is maintaining websites to inform the public of ADU and JADU permitting requirements, as well as of the Proposed Ordinance.

Program HE-U - Modular Accessory Dwelling Units and Garage Conversion Building Plans: County staff has collaborated and created pre-approved plans for ADUs of one-, two-, and three-bedroom units that have already been reviewed and approved by the Building and Safety Division. These plans are available for residents to download for free and submit for a building permit without the added time and expense of creating custom ADU plans.

Program HE-Z - ADU Monitoring: The County will continue to monitor the development of ADUs and JADUs through building permit records and report the findings to HCD on an annual basis in the County's Annual Progress Report.

In addition to the above-mentioned General Plan goals, policies, and programs, staff conducted a review of the various Area Plans and identified that the Proposed Ordinance is consistent with the following additional goals and policies.

**Lake Sherwood/Hidden Valley Area Plan** - The Proposed Ordinance is consistent with Goal LS-5 and Policy LS-5.2 of the Lake Sherwood/Hidden Valley Area Plan, as it allows for ADUs (identified as Second Dwelling Units) that do not count toward the maximum dwelling units allowed within the Lake Sherwood Community.

A comprehensive list of all above-mentioned goals, policies and programs are included in Exhibit 8.

Overall, the Proposed Ordinance facilitates the development of ADUs and JADUs in compliance with the New ADU Laws. The Proposed Ordinance includes some elements that are more permissive (i.e., less restrictive) than state law including, for example, by allowing larger ADUs in certain instances. These amendments do not conflict with existing General Plan or Area Plan goals or policies and are, therefore, deemed consistent with the Ventura County General Plan. Based on the above discussion, this finding can be made.

## D. PUBLIC OUTREACH

County Planning staff created and maintained two ADU-related webpages<sup>3</sup>: one to share information regarding ADUs and JADUs allowed with a building permit per the New ADU Laws, and the process for obtaining a zoning clearance for all other ADUs; and a second page to inform the public of the Proposed Ordinance amendments, which included a sign-up form for residents interested in receiving notifications regarding periodic webpage updates and the Planning Commission hearing for the Proposed Ordinance.

In 2022, Planning Division and Building and Safety Division staff collaborated to update, and make available to the public on the Resource Management Agency website<sup>4</sup>, pre-approved plans for ADUs of one-, two-, and three-bedroom units that have already been reviewed and approved by the Building and Safety Division, so residents can download the plans for free and submit them for a building permit without the added time and expense of creating custom ADU plans. Staff is currently in the process of preparing informational brochures and handouts that will guide property owners in developing the various options for ADUs and JADUs and assist them with navigating through the permit processing requirements, which will be posted online after the Proposed Ordinance is adopted by the Board of Supervisors. Draft versions of these informational brochures are expected to be provided to the Board of Supervisors as part of the board materials for the adoption hearing in Fall 2022.

## E. PLANNING COMMISSION HEARING NOTICE AND COMMENTS

The Planning Division provided public notice regarding the Planning Commission hearing in accordance with Government Code section 65090. The Planning Division also sent an email to interested parties from the online sign-up form and placed a legal ad providing notice of this public hearing in *Vida* (in Spanish) on August 4, 2022, and in the Ventura County Star (in English) on August 4, 2022. This Planning Commission staff report and associated exhibits were made available to the public on the Planning Division website on August 11, 2022. The Planning Commission hearing will include simultaneous interpretation in Spanish for the community.

## F. RECOMMENDED ACTIONS

Based upon the analysis and information provided above, Planning Division staff recommends that the Planning Commission take the following actions:

1. **CERTIFY** that your Commission has reviewed and considered this staff report and all exhibits hereto, and has considered all comments received during the public comment and hearing process;
2. **ADOPT** a Resolution (Exhibit 3) recommending that the Board of Supervisors take the following actions regarding the Proposed Ordinance:

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<sup>3</sup> Planning Division webpage for information on ADU and JADU Permits: [vcrma.org/en/accessory-dwelling-unit-permits](https://vcrma.org/en/accessory-dwelling-unit-permits); and Planning Division webpage for information on the ADU/JADU ordinance amendment: [vcrma.org/en/accessory-dwelling-unit-ordinance-update](https://vcrma.org/en/accessory-dwelling-unit-ordinance-update)

<sup>4</sup> Standardized Plans for Accessory Dwelling Units and Farmworker and Animal Caretaker Dwelling Units webpage: [vcrma.org/en/accessory-dwellings-farmworker-dwellings](https://vcrma.org/en/accessory-dwellings-farmworker-dwellings)

- a. **CERTIFY** that the Board of Supervisors has reviewed and considered the Board letter, the Planning Commission staff report and all exhibits thereto and has considered all comments received during the public comment and hearing process; and
- b. **FIND**, on the basis of the entire record and as set forth in Section B of the Planning Commission staff report, that the adoption of the Proposed Ordinance amending Articles 2, 5, 7, 8, and 11 of the Non-Coastal Zoning Ordinance to amend regulations for accessory dwelling units and to add regulations for junior accessory dwelling units consistent with Government Code Sections 65852.2 and 65852.22 (Exhibit 5) is exempt from CEQA review pursuant to Public Resources Code section 21080.17, which provides, in pertinent part, that CEQA does not apply to the adoption of an ordinance by a city or county to implement the provisions of Government Code section 65852.2; and
- c. **FIND**, on the basis of the entire record and as set forth in Sections A, B, C and D of the Planning Commission staff report, that the Proposed Ordinance amending Articles 2, 5, 7, 8, and 11 of the Non-Coastal Zoning Ordinance (Exhibit 5) is consistent with the goals, policies and programs of the Ventura County General Plan and good planning practices and is in the interest of public health, safety and general welfare; and
- d. **ADOPT** the Proposed Ordinance amending Articles 2, 5, 7, 8, and 11 of the Non-Coastal Zoning Ordinance (Exhibit 5); and
- e. **SPECIFY** the Clerk of the Board of Supervisors at 800 S. Victoria Avenue, Ventura, CA 93009 as the custodian and location of the documents and materials that constitute the record of proceedings upon which these decisions are based.

This staff report has been reviewed by County Counsel. The Board of Supervisors hearing to consider the Proposed Ordinance is tentatively scheduled for October 4, 2022 in the Board of Supervisor's hearing room.

If you have any questions concerning the information presented above, please contact Ruchita Kadakia at (805) 654-2414 or by email at [Ruchita.Kadakia@ventura.org](mailto:Ruchita.Kadakia@ventura.org).

**Prepared by:**



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Ruchita Kadakia, Manager  
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RMA/Planning Division

**Reviewed by:**



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Dave Ward, AICP  
Planning Director  
RMA/Planning Division

**EXHIBITS:**

- Exhibit 2: Location Map of Applicable Zones for Proposed Ordinance Pertaining to ADUs and JADUs in the Non-Coastal Zone
- Exhibit 3: Proposed Planning Commission Resolution to the Board of Supervisors
- Exhibit 4: Proposed Ordinance amending Articles 2, 5, 7, 8 and 11 of the Non-Coastal Zoning Ordinance (legislative version)
- Exhibit 5: Proposed Ordinance amending Articles 2, 5, 7, 8 and 11 of the Non-Coastal Zoning Ordinance (clean version)
- Exhibit 6: Summary of ADU laws and History of ADUs in the County of Ventura
- Exhibit 7: ADU and JADU Laws (Government Code sections 65852.2 and 65852.22)
- Exhibit 8: List of Relevant General Plan and Area Plan Goals and Policies