

Herbert Gomez  
79 Monte Vista Avenue  
Watsonville, Ca 95076  
January 21, 2024

JAN 21 '25 PM 2:57

Received  
Watsonville  
City Clerk

City of Watsonville Community Development Department

250 Main Street, Watsonville Ca 95076

RE: PP2024-7815/PP2022-3712

This appeal is in response to the City of Watsonville denial for the accessory dwelling unit application for 79 Monte Vista Avenue. The planning commission was provided misleading and incorrect information to make their determination. The commissioners were not provided with any alternative options in which to uphold the appeal. There was confusion, lack of clarity and no appropriate instruction was provided. The commission asked for and was ignored a recess to have time to go through all the lengthy testimony. The commission was forced into making their decision with the only available option to them with the motion made by Councilmember, Jimmy Dutra's commissioner, Lucy. It was obvious the commission felt obligated to reach the only option they had been given to them at the time of this hearing.

While the California Department of Housing and Community Development is to be a resource and has provided guidance with an ADU Handbook, that State department, as well as zoning administrators are required to comply with the laws written in the legislation written and established by the Senate Housing committee. Even the FAQ in the current handbook clarify what we have been trying to address.

The crux of the zoning administrator's denial is based on the term "dimension". The Senate Housing Committee, which creates these laws and government code sections, responded to our request to verify the language of the law concerning "dimension" as it relates to height when creating ADU's on a legal nonconforming dwelling site. The Senator's office provided this clarity, which supports our argument that we can legally build up to 18 feet where this site is located. In addition, the zoning administrator cannot deny this application to correct a nonconforming condition. This has been verified in government code 66314 (d) (7). And added to government code sections 66322 subd (b).

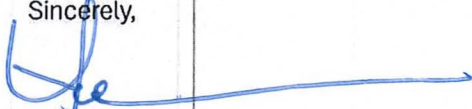
As indicated by the response from Senator Dr. Aisha Wahab's staff, the denial reason of noncompliance 66314(d)(7) given from the zoning administrator is incorrect. This language does NOT speak to height:

(vii) No setback shall be required for an existing living area or accessory structure or a structure constructed in the same location and to the same dimensions as an existing structure that is converted to an accessory dwelling unit or a portion of an accessory dwelling unit....

Height requirements are established in Government code 66321, where the building can go up to 18 feet if within ½ mile of a major transit stop. This section establishes height requirements for developing an ADU, while the former government code clarifies the structure cannot be forced to new standards for a required setback.

You will note that there are two application numbers in this appeal: PP2024-7815/PP2022-3712. This is because we received a conditional approval where we continuously "acted upon" the conditions, but were issued a new application.

Sincerely,



Herbert Gomez



Received  
Watsonville  
City Clerk

Herbert Gomez  
79 Monte Vista Avenue  
Watsonville, Ca 95076  
November 13, 2024

City of Watsonville Community Development Department

250 Main Street, Watsonville Ca 95076

RE: PP2024-7815

This appeal is in response to the City of Watsonville denial for the accessory dwelling unit application for 79 Monte Vista Avenue, which is based on outdated guidance not in alignment with current State legislation.

The City is imposing the maximum standards for the development of housing within the city limits, which is counterproductive with the State's intent and incentives to create housing. The City is required to impose objective standards on accessory dwelling units that include, but are not limited to, parking, height, setback, landscape. The 2022 California Department of Housing and Community Development ADU Handbook you have reference (page 16) is inconsistent with the current language of the state law. State legislation supersedes the handbook, which is now three years old and has not been updated. Current AB 2221 and SB 897, amended Gov. Code section 65852.2 includes, numerous changes to the State ADU laws that permits jurisdictions to provide cities with flexibility such as to let ADUs go taller and closer to the property lines particularly when dealing with preexisting, legal non-conforming, historic infill land use development.

(vii) No setback shall be required for an existing living area or accessory structure or a structure constructed in the same location and to the same dimensions as an existing structure that is converted to an accessory dwelling unit or a portion of an accessory dwelling unit....

While the handbook, page 16, adds height in its description with the dimension, the current State legislation does not address height in its definition. If the legislatures intended to include height in their definition of dimension, then it would validate your decision for denial. Since the law makes no mention of height, the City cannot apply its interpretation in the decision to deny this application. "A local agency shall not require, as a condition for ministerial approval of a permit application for the creation of an accessory dwelling unit or a junior accessory dwelling unit, the correction of nonconforming zoning conditions."

SB 897 prohibits a local agency from rejecting an application for an accessory dwelling unit because the existing multifamily dwelling exceeds applicable height requirements or has a rear or side setback of less than 4 feet. Your requirement of the maximum set back of four feet is not a State requirement, particularly when the State allows new construction on currently existing sites to be developed for housing. Nor can local agencies deny an application to create an ADU solely because corrections are needed to address nonconforming zoning conditions.

In addition, the City is obligated to provide a full set of comments listing the specific items that are defective or deficient. These comments must also describe how the applicant can remedy the deficiencies. We have not received such materials nor guidance. This makes for an incomplete denial process for this application.

Sincerely,

Herbert Gomez



## From the Office of State Senator Dr. Aisha Wahab

From: Ledesma Rhinehalt, Barbara (barbara.ledesmarhinehalt@sen.ca.gov)

To: integrity\_lending@yahoo.com

Date: Friday, December 13, 2024 at 03:46 PM PST

Hi Ms. Coffman-Gomez,

I checked in with the Senate Housing committee regarding the message you send our office. I want to note, that our office and the Senate Housing committee do not provide legal advice. We highly recommend you reach out to the California Department of Housing and Community Development (HCD); they manage ADUs in the state and can provide more information.

If you want our office to facilitate, please sign and return the attached ROI Form. The ROI form gives us your consent to share your information with relevant state agencies to address your concerns. If you have questions about the ROI form, please call our office at 510-794-3900.

Currently, HCD is in the process of updating its ADU handbook to reflect recent changes to ADU law. The 2022 handbook is generally correct but there are some pieces in there that are now out of date. You can review the handbook at this link: [ADUHandbookUpdate.pdf](#)

The section of the Gov Code you are referring in your message is now Gov Code 66314 (d)(7) due to restructuring of ADU laws in 2024. That section specifies that a local agency's ordinance shall not require a setback for an ADU that is built in the same location and to the same dimensions as an existing structure. However, that does not speak to height requirements, which it sounds like is the barrier you are confronting.

Height requirements are established in GC 66321. That section authorizes locals to impose a height limit of 16 feet on a detached ADU (however if the property is located within ½ mile of a major transit stop locals can only impose a height limit of 18ft for a flat roof (an extra two feet is allowed to accommodate a pitched roof). Locals can allow for a greater height, but the law prohibits them from requiring an ADU to be shorter than those limits. Note that the height limits for ADUs that are attached to the primary dwelling (e.g. an addition to the house) are slightly different, but it sounds like you are converting a garage that is detached from the house so that is not relevant here.

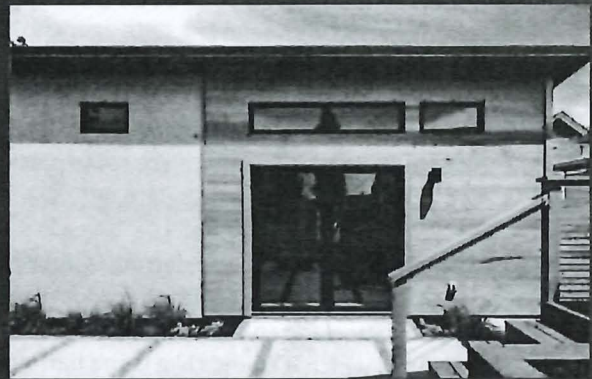
If I understand you correctly, you are trying to build an ADU on top of a garage and the height of that structure would exceed 16/18 ft., it's possible that the city has an ordinance that would prohibit that development. Local agencies are allowed to waive requirements in their ordinance but that is at their discretion.

(If the existing structure that is being converting is already taller than 16/18ft, I think someone could argue that GC 66314(d)(7) which allows the structure to be built to the same dimensions, would enable you to exceed the height limit as that is a part of the buildings existing dimensions. E.g. if the garage is already 25 feet tall they could argue that you can put an ADU on top so long as finished structure still measures less than 25 feet, however if the garage is less than 16 feet, local governments are authorized to limit the height to 16 feet. That is a question to verify with HCD's ADU unit as it relates to legal interpretation of that existing law.

If you have any additional questions, or need clarification, please reach out.

Thank you,  
Barbara LR





CALIFORNIA DEPARTMENT OF HOUSING AND COMMUNITY  
DEVELOPMENT

# ACCESSORY DWELLING UNIT HANDBOOK

January 2025





additional two feet for roof pitch to align with the roof pitch of the primary dwelling unit." (Gov. Code, §§ 66321, subd. (b)(4)(B); 66323, subd. (a)(2)(B).) Increases the height to 18 feet for a detached ADU that is "on a lot with an existing or proposed multifamily, multistory dwelling." (Gov. Code, § 66321, subd. (b)(4)(B).)

- **Attached ADU Height Limitations.** Establishes the maximum height limitation that may be imposed by a local agency on an attached ADU to 25 feet, or the existing primary dwelling height limit if lower than 25 feet. Does not require a local agency to allow an ADU to exceed two stories (Gov. Code, § 66321, subd. (b)(4)(D)).
- **Parking Standards.** Prohibits local agencies from imposing parking in a number of specific circumstances (Gov. Code, § 66322, subd. (a)).
- **Zoning Nonconformance & Building Code Violations.** Prohibits local agencies from denying an ADU permit due to the correction of "nonconforming zoning conditions, building code violations, or unpermitted structures that do not present a threat to public health and safety and are not affected by the construction of the accessory dwelling unit." (Gov. Code, § 66322, subd. (b).) The prohibition was also added to Government Code section 66336 to apply to JADUs.
- **Multifamily Dwellings.** Prohibits a permitting agency from requiring "any modification of the existing multifamily dwelling as a condition of approving the application to construct an accessory dwelling unit" if the existing multifamily dwelling has "a rear or side setback of less than four feet..." (Gov. Code, § 66323, subd. (a)(4)(B)).
- **Permitting Agency Definition.** Adds definition of a permitting agency as "any entity that is involved in the review of a permit for an accessory dwelling unit or junior accessory dwelling unit and for which there is no substitute, including, but not limited to, applicable planning departments, building departments, utilities, and special districts." (Gov. Code, § 66313, subd. (k).)
- **Unpermitted ADUs.** Precludes a local agency from denying a permit for an unpermitted ADU that was constructed before January 1, 2018, because the ADU violates building standards or because the ADU does not comply with State ADU Law or a local ordinance. (Gov. Code, § 66332, subd. (a).) This prohibition does not apply if the local agency makes a finding that "correcting the violation is necessary to protect the health and safety of the public or occupants of the structure" (Gov. Code, § 66332, subd. (b)) or to a building that is deemed substandard pursuant to Health and Safety Code section 17920.3 (Gov. Code, § 66332, subd. (c)).
- **Enclosed Uses.** Considers enclosed uses within the residence, such as attached garages, to be "a part of the proposed or existing single-family residence" for the purposes of JADUs (Gov. Code, § 66333, subd. (d)).



For more information, please visit <https://sf.freddiemac.com/docs/pdf/fact-sheet/adu-fact-sheet.pdf>.

### **Fannie Mae**

Fannie Mae now offers financing options for adding an ADU to an existing property, building a home with an ADU using Construction-to-Permanent Financing, and buying a home with an existing ADU.

For more information, please visit <https://singlefamily.fanniemae.com/originating-underwriting/mortgage-products/accessory-dwelling-units>.

## **Height Requirements**

### **Is there a limit on the height of an ADU?**

There is no height limit contained in State ADU Law, but local agencies may impose height limits pursuant to Government Code section 66321, subdivision (b)(4). A local agency may impose a height limit by adopting a compliant ADU ordinance.

A local agency may not impose a height limit that is less than the following:

*\* city is out of compliance and must comply with State law*

### **Detached ADUs**

16 feet on a lot with a proposed or existing single-family or multifamily dwelling unit (Gov. Code, § 66321, subd. (b)(4)(A)).

18 feet on a lot with an existing or proposed single-family or multifamily dwelling, including an additional 2 feet to accommodate roof pitch that aligns with the primary dwelling, when the lot is a half-mile from a major transit stop or high-quality transit corridor (Gov. Code, § 66321, subd. (b)(4)(B)). Please see the ADU Glossary for definitions of these terms.

18 feet height on a lot with an existing or proposed multifamily, multistory dwelling (Gov. Code, § 66321, subd. (b)(4)(C)).

If a detached two-story ADU can be built according to the height allowances required under State ADU Law while remaining compliant with the building code, a local agency cannot deny an ADU application to create a two-story ADU, irrespective of the underlying zoning that might restrict a primary dwelling to one story. (Gov. Code, §§ 66321, subd. (b)(4)(D); 66314, subd. (d)(8).)

### **Attached ADUs**

25 feet or the height limitation that applies to the primary dwelling in the local zoning ordinance, whichever is lower (Gov. Code, § 66321, subd. (b)(4)(D)).



eligible for up to two units, including, for example, a primary unit and an ADU or JADU. In the case that a lot owner both splits a lot and builds two primary units on each resulting lot under SB 9, State ADU Law is superseded (i.e., neither lot is entitled to an ADU or JADU); in all other cases, State ADU Law applies, up to SB 9's four-unit cap. (Gov. Code, § 66411.7, subd. (j).)

Members of the public with SB 9 complaints are encouraged to share them to the [Housing Accountability Unit Portal](#). Please also see HCD's [SB 9 Fact Sheet](#).

## **Setbacks**

### **Can setbacks be required for ADUs?**

Yes. A local agency may impose objective development standards, such as setbacks, for the creation of ADUs. A setback of no more than four feet from the side and rear lot lines shall be required for an attached or detached ADU (Gov. Code, § 66314, subd. (d)(7)). Additional setback requirements may be required in the Coastal Zone if required by a local Coastal Program (Gov. Code, § 66329).

### **Are setbacks required for ADUs/JADUs created within an existing structure or replacing an existing structure?**

No setback shall be required for an ADU or JADU created within an existing living area or accessory structure or an ADU created in a new structure in the same location and to the same dimensions as an existing structure (Gov. Code, § 66314, subd. (d)(7)).

### **Can a local agency impose front setbacks?**

Yes. A local agency may apply front yard setbacks for ADUs, but front yard setbacks cannot preclude an ADU of at least 800 square feet from being built on the property, even if that ADU would exist partially or wholly within the front setback (Gov. Code, § 66321, subd. (b)(3)).

### **Can a local agency require an ADU be built in an alternate location to comply with front setback requirements?**

Maybe. Local agencies may set objective standards, including front setbacks. However, a permitting agency may not require that an ADU of up to 800 square feet be built in an alternative location based on discretionary, or non-objective, standards. Requiring an alternative site, using objective standards, to comply with front setback requirements must not be overly burdensome such that it unreasonably restricts the ability of homeowners to create ADUs in zones in which they are authorized by local ordinance. (Gov. Code, §§ 66321, subd. (b)(3); 66311.)

### **Is there a distance requirement between an ADU and other structures on the lot?**

State ADU Law does not address the distance between an ADU and other structures on a lot. A local agency may impose objective development standards for the creation of some ADUs, and all ADUs must comply with local building codes. However, development standards should not unreasonably restrict the creation of ADUs. (Gov. Code, § 66311.) Minimum distance or other requirements may not be applied if they would unreasonably restrict the creation of ADUs, unless they are a requirement of a Building or Fire Code (Gov. Code, § 66314, subd. (d)(8)).



## COMPLETENESS ISSUES

### Planning

1. **Nonconforming garage.** The project proposes the demolition of the existing nonconforming garage and reconstruction in the same footprint with an additional 300 square feet of unconditioned space. The proposed garage, as new construction, is required to meet the setbacks for accessory structures in WMC Section 14-40.030. For an accessory building with an accessory dwelling unit that exceeds 16 feet in height, a 5-foot setback from rear and side yard property lines is required.
2. **ADU Setbacks.** Because the City of Watsonville's ADU Ordinance (WMC Chapter 14-23) is out of compliance with state law, the City utilizes Government Code Sections 66314-66332 to regulate ADU development within the city. Per Government Code Section 66321(b)(3), the City can require an accessory dwelling unit to have four-foot side and rear yard setbacks. The proposed project does not comply with this requirement.
3. **Conversion of Existing Structures.** Government Code Section 66314(d)(7) states that *"no setback shall be required for an existing living area or accessory structure or a structure constructed in the same location and to the same dimensions as an existing structure that is converted to an accessory dwelling unit or to a portion of an accessory dwelling unit, and a setback of no more than four feet from the side and rear lot lines shall be required for an accessory dwelling unit that is not converted from an existing structure or a new structure constructed in the same location and to the same dimensions as an existing structure."* The proposed project does not propose converting the existing nonconforming garage into an ADU, and even if it did, the new garage with the ADU is not the same dimensions as the existing nonconforming garage, so the setback exemption does not apply and four-foot side and rear yard setbacks are required for both the garage and the ADU.

### NEXT STEPS

If you have any questions regarding the incomplete letter, please contact Associate Planner Ivan Carmona at (831) 768-3078 or [ivan.carmona@watsonville.gov](mailto:ivan.carmona@watsonville.gov). I look forward to working with you to bring this project to completion. Thank you for your time.

Sincerely,



Ivan Carmona  
Associate Planner





# City of Watsonville

"A Community of Opportunities"

October 21, 2024

Peter Odryna  
200 Citron Drive  
Soquel, CA 95073

Application submitted: October 1, 2024  
File Number: PP2024-7815

Re: Incompleteness of Application for an Administrative Review Permit for a New Detached Garage and Second-Story Accessory Dwelling Unit

Dear Peter Odryna:

Thank you for submitting your recent application for an Administrative Review Permit for a new detached garage with a second-story ADU. The purpose of this letter is to inform you that staff has reviewed your application, determined that it **does not comply with state law regulating accessory dwelling units (ADUs)**. City Staff cannot approve administrative review permits that do not comply with the requirements of the Watsonville Municipal Code or state law, therefore Administrative Review Permit #PP2024-7815 is **denied**.

This letter provides detailed comments from staff within the Community Development Department with guidance for designing a project that complies with state ADU law. Please submit revised plans and associated documents electronically to the Project Planner. For an appointment to resubmit the contents of this letter, please contact the project planner.

### **Project Overview**

The proposed project includes the demolition of an existing nonconforming detached garage and construction of a new, detached, nonconforming garage, a new second-story ADU measuring 750 square feet with a 222-square-foot deck at 79 Monte Vista Avenue (APN 018-521-01).

The property currently contains a 2,488-square-foot single-family residence with a detached garage totaling 580 square feet on an 11,195-square-foot parcel. To accommodate the new garage and ADU, the existing detached garage will be demolished. This property falls within the Residential Low Density (R-LD) designation on the General Plan Land Use Map and lies within the Single Family Residential-Low Density (R-1) Zoning District.

Per Watsonville Municipal Code (WMC) Section 14-12.400(b)(5), single-family residential development is exempt from the Design Review requirements. Therefore, the project is only required to obtain an Administrative Review Permit via the application process described in WMC Section 14-12.301. The Zoning Administrator reviews the application to ensure compliance with the Watsonville Municipal Code and any other applicable state laws, in this case the current state ADU law located in Government Code Sections 66314-66332.

831-768-3050  
cdd@watsonville.gov  
www.watsonville.gov

Community Development  
250 Main Street  
Watsonville, CA 95076





## PLANNING | ADMINISTRATIVE REVIEW PERMIT

**ARP:** PP2022-3712  
**Date:** June 21, 2022  
**Subject:** Build (n) second story 750 SF ADU over existing garage consisting of 2 bedrooms and 2 baths, kitchen, living room, and 96± SF deck. Also construct 260± SF addition to existing garage.  
**Address:** 79 Monte Vista Ave (APN 018-521-01)  
**PC By:** Ivan Carmona, Associate Planner

The review of your drawings has been completed for **ADMINISTRATIVE REVIEW** and **does** require corrections prior to submitting a building permit application. Please correct all items listed in the Administrative Review prior to submitting a building permit.

Mark in this column where on plans corrected.

Comments:

■ Approved with conditions

### Background:

- According to Santa Cruz County Assessor's data, 79 Monte Vista Ave (APN 018-521-01) has an existing one-story 2,488± square foot single family residence with 3 bedrooms and 2 bathroom with an attached porte cochere and detached 504± square foot garage.
- 79 Monte Vista Ave is located within the Single Family Residential – Low Density (R-1) Zoning District on a 11,195± SF square foot parcel.
- The project consists of constructing a two-story 750± SF ADU with 2 bedrooms, 2 baths, kitchen, living room, and 96± square foot deck over the existing detached garage. The project also includes a 260± square foot addition to the existing detached garage.
- **Pursuant to WMC Section 14-23.030(a)**, a lot size greater than 10,000 SF is allowed one ADU with maximum size of 1,200 SF with no more than 3 bedrooms.
- **Two-story ADU.** An ADU may be constructed over an existing detached garage and maintain its current location as long as the proposed two-story ADU does not exceed a height of 16-Feet. Pursuant to WMC Section 14-18.154, building height shall mean the vertical distance from the grade, to the highest point of the coping of a flat roof or deck ling of a mansard roof or to the average height of the highest gable of a pitch or hip roof.
- **Garage size limitations.** Pursuant to WMC Section 14-40.030(a)(6), accessory building, such as garages, shall not exceed 500 square feet in size. If a garage proposes to be greater than 500 SF, then a wall separating the garage is required.
- **Setbacks for existing accessory structures.** Pursuant to WMC Section 14-23.030(g)(3), a detached accessory structure may be converted and rebuilt in the same location and to the same dimension as the existing accessory structure, so long the building height does not exceed a building height of 16-Feet. If the building height exceeds 16-feet, then a four-foot setback is required.
- **Garage Addition.** The proposed garage addition must meet the four-foot side yard setbacks.



- **Parking.** The primary single-family residence has three bedrooms and requires two parking spaces, one of which is covered. The proposed ADU requires one additional parking space and is allowed within the driveway. **Total parking required is three spaces.**
- **Impact Fees:** ADUs greater than 750 square feet are subject to development impact fees. WMC Section 14-23.080.
- **Utility connections.** ADUs greater than 750 square feet are subject to separate utilities connections.
- **Fire sprinklers:** If the primary dwelling does not contain a sprinkler system, the proposed ADU may not require an additional sprinkler system. This is not all-inclusive standard as some proposed projects may trigger the requirement for fire sprinklers. WMC Section 14-23.050.
- **Prior to submitting a building permit application, please revise the plans to include the following correction items below and ensure the plans meet all 2019 Residential Building Code for building, mechanical, plumbing, electrical, Title 24 Energy Compliance, and fire:**

**Corrections.** These items will need to be added to the Building Permit plans prior to submission for building permit review. The below items are requested by the Planning Department only.

1. **Exterior.** Revise the plans to provide elevations to identify the materials for the existing single-family residence and proposed ADU. The exterior design of the ADU must be consistent with the principal residence. Building materials, architectural style, roof form and pitch, height scale, exterior colors and finishes must be substantially the same as the existing dwelling. WMC Section 14-23.040(a)
2. **Landscaping.** Please provide a landscaping and irrigation plan prior to submittal of a building permit. No less than twenty (20%) percent of the lot shall be landscaped. All areas of the site that are not utilized for buildings, patios, parking, pedestrian, or vehicular access shall be landscaped and provided with permanent irrigation system. The front yard shall be landscaped, exclusive of walkways and driveways. Prior to submitting a building permit application, revise the plans to include a landscaping and irrigation plan for the proposed project. The Landscaping and Irrigation plan shall provide a planting list showing the common name, scientific name, quantity, and sizes of all planting materials. WMC Section 14-23.040(b)
3. **Private open space.** Please provide a site plan identifying the required open space for the ADU. The ADU shall have a deck or a patio, directly adjoining the unit. The minimum private open space required for the ADU shall be no less than 96 SF with a minimum width of 6-FT for a deck/patio and 8-FT for a landscaped area. Prior to submitting a building permit application, revise the plans to identify the required 96 SF of open for the ADU. WMC Section 14-23.040(c)
4. **Access.** Revise the plans to show interior access for the ADU. The ADU entrance shall face the interior of the property when it's not abutting a public right-of-way. WMC Section 14-23.040(d)
5. **Window design.** Windows which face an adjoining residential property shall protect the privacy of neighbors, alternatively, fencing or landscaping shall be required to provide screening.
6. **Hardscape and walkways.** Revise the plans to show how access from the driveway to the ADU entrance is provided via walkways. When showing the path of travel from the driveway to the ADU entrance, please provide details for any proposed walkways. The site plan must identify the path of travel from the driveway to the ADU entrance.
7. **Impervious Surface.** Revise the site plan to identify the existing and proposed impervious surface for the



proposed ADU and the property. If more than 2,500 SF of impervious surface is created, repaired, or replaced, the project requires meeting the Post Construction Stormwater Regulations for the City of Watsonville. Identify, on the site plan, the existing and/or proposed impervious surface for the proposed project. In order to ensure the project does not exceed 2,500 SF of new/repaired/replaced impervious surface, more landscaping may be required.

- 8. Fire sprinklers:** If the primary residence does not contain a sprinkler system, the proposed ADU does not require an additional sprinkler system. This is not all-inclusive standard as some proposed projects may trigger the requirement for fire sprinklers. WMC Section 14-23.050.
- 9. Address Assignment.** Submit an Address Assignment Request to the Community Development Department for review at time of building permit application.

Should you have questions regarding the comments, contact the plan checker at 768-3078 or at [ivan.carmona@cityofwatsonville.org](mailto:ivan.carmona@cityofwatsonville.org).



## ADU proposal and setbacks

