



May 23, 2025

Jamie Candelaria, Senior Housing Accountability Manager
 Department of Housing and Community Development
 Housing Policy Development Division
 651 Bannon Street, 10th Floor
 Sacramento, CA 95811

Subject: Response to HCD Findings Regarding ADU Ordinance No. 1244 under State ADU Law
 (Gov. Code, §§ 66310 - 66342)

Dear Ms. Candelaria,

Thank you for HCD's review of the City of Ukiah's Accessory Dwelling Unit (ADU) Ordinance No. 1244, as outlined in the letter dated April 24, 2025. The City of Ukiah appreciates the opportunity for HCD staff, particularly Reshma Sen, HCD Representative II, to collaborate with the City of Ukiah over the past few weeks.

As a designated Pro-Housing City, Ukiah is proud to be on track to meet its 6th Cycle Regional Housing Needs Allocation (RHNA) and continues to implement policies that expand affordable and market-rate housing opportunities and remain committed to aligning our local ordinances with State housing law.

The following is the City's formal response to the 18 findings raised in HCD's letter (enclosed). All identified changes will be incorporated into a revised ordinance, which will be noticed and scheduled for a public hearing before the Planning Commission on June 26, 2025, followed by introduction to, and possible adoption by, the City Council in July:

1. **Senate Bill 1211:** As required by SB 1211, language will be integrated to allow up to 8 detached ADUs on lots with existing multifamily dwellings (not to exceed the existing unit count), and up to 2 detached ADUs on lots with proposed multifamily dwellings.
2. **Assembly Bill 2533:** The ordinance will be revised to include provisions of AB 2533 allowing recognition and regulation of previously unpermitted ADUs and extending protections to JADUs.
3. **Statutory Numbering:** Outdated citations (e.g., §65852.2) were initially flagged for replacement; however, per subsequent correspondence from Reshma Sen the reference to statutory numbering was sent in error. Therefore, no change is required regarding code citations based on that item.
4. **Converted ADUs:** The City will revise §9056.1(E) to explicitly state that ADUs may be created by converting or adding to existing accessory structures (including garages), consistent with §66314(d)(3).
5. **ADU Application Review Language:** The phrase "acted on" will be replaced with "approve or deny" to comply with current State ADU Law.

6. **Attached Garage Conversions:** The ordinance will be amended to clarify that attached garages may be converted to ADUs. Notably, since 2017, attached garage conversions have comprised a significant share of the ADU permits issued in Ukiah.
7. **ADU Combinations:** The City will amend the ordinance to provide for all ADU combinations described in Government Code §66323.
8. **Size Limits for Multifamily ADUs:** Size limits will be removed for detached ADUs on lots with a multifamily dwelling structure, as requested by HCD staff.
9. **Off-Site Improvement Requirements:** All off-site improvement mandates (e.g., sidewalks, street trees) will be removed in accordance with §66315. Staff recognizes that these improvements are an additional standard not authorized by State ADU Law.
10. **Fire Sprinklers:** The ordinance will clarify that ADUs do not trigger fire sprinkler installation requirements in the primary dwelling, pursuant to §§66314(d)(12) and 66323(c). This codifies the City of Ukiah's existing practice that the construction of an accessory dwelling unit shall not trigger a requirement for fire sprinklers to be installed in the existing primary dwelling.
11. **Uncovered Parking Replacement:** Language will be added to confirm that uncovered parking spaces demolished or converted for ADU construction are not required to be replaced.
12. **Height Standards:** Height provisions will be updated to reflect a 25-foot standard for all detached ADUs.
13. **Section 9056.7 – Development Standards:** §9056.7(A), (B), (C), and (E) will be removed to ensure compliance with §66314(b)(1).
14. **Section 9056.7 – Development Standards:** §9056.7(A), (B), (C), and (E) will be removed to ensure compliance with §66314(b)(1).
15. **JADU Application Review Language:** The phrase “acted on” will be replaced with “approve or deny” to comply with current State ADU Law.
16. **JADU Utility Fees:** It is understood that JADUs are not considered a new residential use for purposes of calculating connection fees or permit for water or sewer. The ordinance will be clarified to reflect this limitation.
17. **Deed Restriction Typo:** The ordinance will correct the grammatical issue in §9057.1(D)(4)(i) by replacing “A prohibition” with “Includes a prohibition.”
18. **Severability Clause:** The severability clause will be removed to comply with §66316, which requires that non-compliant ordinances be deemed null and void.

The City of Ukiah remains committed to supporting Accessory Dwelling Units (ADUs) as a key component of its housing strategy. During this 6th Cycle, over 35 new or converted ADU permits have been issued, reflecting strong and sustained local interest in this form of incremental housing. In 2020, the City developed three sets of engineered ADU building plans and made them available to the community at no cost. Each design has now been successfully utilized multiple times. These tools, along with ongoing day-to-day support and interactions continue to lower barriers for residents interested in building ADUs here.

Moving forward, Staff will ensure full compliance and submit materials for timely review by HCD staff as updates become available. We request prompt feedback from HCD so that staff can incorporate any input for discussion or response by the City Council.



Overall, the City's response and these updates are aimed at ensuring full alignment with State ADU Law and reinforcing Ukiah's commitment to increasing housing production through clear, objective, and legally compliant regulations. We welcome continued collaboration with HCD and look forward to working together to provide our experience and advance shared housing objectives across California.

Sincerely,

A handwritten signature in blue ink, appearing to read "Craig Schlatter", is written over the typed name.

Craig Schlatter, AICP
Community Development Director

Enclosures (1)

CC: Sage Sangiacomo, ICMA-CM, City Manager
David Rapport, City Attorney
Darcy Vaughn, Assistant City Attorney
Jesse Davis, AICP, Chief Planning Manager
Jim Robbins, Housing and Grants Manager