DATE AND CONSIDERED BY BY

Response to Grand Jury Report Form

Report Title:	Affordable Housing: Past, Present and Future						
Report Date:	June 14, 2022						
Response by:	Todd Lands		Title:	e: Mayor			
Agency/Depart	ment Name:	City of Cloverdale					
FINDINGS: F	1, F2, F3, F4,	F5, F7, F10, F11,	F12, F1	3, F14, F1	l6, F17, F:	19, F20, F2	1,
I (we) agree wit	th the findings	numbered: <u>1,2,3, 5</u>	,6,8,9,1	1,13,14,16,	18,19,20,2	1,22,23,24	_
I (we) disagree wholly or partially with the findings numbered: 4,7,10,12,15,17							_
(Attach a stater explanation of		gany portions of the	findings	s that are d	isputed wit	h an	
RECOMMENI	DATIONS: R	1, R2, R3, R4, R5,	R6, R7	, R8			
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Date: 9/1/20	022	Signed:	RM	loond	fer	Todd	Lands
Number of pag	ges attached:	10					
(See attached C	ivil Grand Jury	Response Requirem	ents)				



SONOMA COUNTY CIVIL GRAND JURY REPORT 2021-2022 Affordable Housing: Past, Present and Future

City of Cloverdale Responses to Findings

F1. Increased Affordable Housing has been mandated by the State of California and officially accepted by Sonoma County and its nine Cities.

The City of Cloverdale agrees with the finding that the State of California has passed increased legislation to mandate the planning for, production of, and preservation of affordable housing to meet the needs of California residents. These mandates have increasingly been pushed to the local jurisdictions to implement proactively and reactively as applicable. The City has supported increased strategies to implement affordable housing in Cloverdale in an effort to meet state requirements, and in some cases have gone beyond state requirements by allowing 2 ADUs per property. The City has also supported the implementation of state mandates such as SB 35 and AB 2162 to facilitate the production of much-needed affordable housing units, particularly to lower income households and special needs housing. Both the City Council and Planning Commission have been updated on the all the mandates with the assistance of our City Attorney.

F2. Housing jurisdictions must show sufficient progress in meeting 6th cycle Regional Housing Needs Allocation mandates or they risk being fined or losing local authority over their housing programs.

The City of Cloverdale agrees to the state requirements to demonstrate progress in meeting the 6th cycle Regional Housing Needs Allocation (RHNA). Typically, this reporting is through the preparation and submission of an Annual Progress Report (APR) demonstrating both production of housing units toward meeting RHNA but also implementation of key programs adopted to facilitate compliance with state mandates. The City of Cloverdale regularly submits the APRs on-time to maintain the certification of its Housing Elements. The City realizes the consequences of not adequately producing housing units at the lower income level during the 5th cycle, resulting in the mandated ministerial processing of housing projects under SB 35 and is aware that similar additional consequences are outlined by the State for jurisdictions who fail to demonstrate sufficient progress in meeting their local RHNA during the upcoming 6th cycle.

F3. Sonoma County and its nine Cities have officially recognized the need for Affordable Housing but not all have fully endorsed the Regional Housing Needs Allocation or met earlier goals.

The City agrees with the finding. The City of Cloverdale and other jurisdictions in Sonoma County have recognized the need for affordable housing and taken strides to facilitate affordable housing to meet the needs of Sonoma County residents and implement state mandated RHNA across all income categories. While the City of Cloverdale and other Sonoma County jurisdictions have been actively promoting needed resources and tools to facilitate the planning for, production of, and preservation of housing, it is likely, and not uncommon, that not all jurisdictions have been able to meet their RHNA goals in the past. However, the City of Cloverdale believes that these results are in large part due to a number of other unrelated reasons, but that Sonoma County and all nine Cities (including Cloverdale) have in fact fully endorsed the Regional Hosing Needs Allocation.



F4. Some cities hinder the development of Affordable Housing through designation of new historic districts, increased landscaping requirements, highly restrictive zoning, and exploitation of environmental concerns.

The City of Cloverdale finds it difficult to entirely agree or disagree with this finding in large part because the City is unaware of the various development regulations that may exist within the municipal codes of all other Cities within the County as well as Sonoma County that have the potential to hinder development of Affordable Housing. However, the City agrees that the strategies outlined in the finding above, as well as a myriad of other factors, many of which are not under the control of a jurisdiction (opposition from neighbors and/or special interest districts), do exist in California Cities and Counties and ultimately contribute to hindering the development of Affordable Housing. The City of Cloverdale does not have any historic districts or increased landscaping requirements.

F5. Public acceptance of the need for Affordable Housing is not universal; NIMBYism and misinformation can negatively impact the planning and development process.

The City of Cloverdale agrees with this finding, and has recently experienced elements of this from neighbors as well as special interest districts. As obstacles to the development of Affordable Housing such as misinformation and NIMBYism appear to be on the rise, going forward the City must make increased efforts to counter such obstacles to Affordable Housing development. The City believes education of its citizens on the need for affordable housing is a good place to start.

F6. In Sonoma County, costs and availability of land, building supplies, and labor impede development and construction of Affordable Housing.

The City of Cloverdale agrees with the finding. Sonoma County has a strong commitment to urban growth boundaries and community separators to ensure preservation of open spaces and avoid urban sprawl. One result of that commitment is a defined and limited boundary for development. Additionally, the cost of building supplies and limited availability of labor has significantly increased cost to the construction of affordable housing in the region.

F7. There is great variability in the planning and approval processes and procedures for developing Affordable Housing in the County and its Cities, thus complicating and slowing development.

The City of Cloverdale mostly agrees with this finding. Great variability exists in the planning and approval processes and procedures from jurisdiction to jurisdiction in large part due to the great variability between the vision and make up of each individual jurisdiction. These processes and procedures evolve over time, typically along and in line with the overall evolution of the jurisdiction. However, this is not unique to Sonoma County jurisdictions and a developer with various projects in various jurisdictions is aware of this fact and would understand that this fact alone does not necessarily complicate or slow down development of housing. Each jurisdiction retains local discretion to ensure that the uniqueness and individuality of their community is preserved, enhanced, and evolves consistent with the community's vision. The local discretion should not intentionally or unintentionally complicate or obstruct the production of needed affordable housing in each jurisdiction and it is up to the individual jurisdiction to develop tools to facilitate much needed housing while respecting community character.



F8. Financing of Affordable Housing projects is unusually complex, slow, and uncertain.

The City of Cloverdale agrees with this finding. The City of Cloverdale has a strong history of working in partnership with our affordable housing providers to gain funding to finance affordable housing projects. The City has a good track record of awarding local funding to help make other funding applications more competitive for our affordable housing providers. When appropriate the City has partnered with affordable housing providers for funding awards to cover ancillary aspects such pedestrian network improvements, enhanced transit opportunities, and infrastructure investment. City staff regularly prioritizes production of necessary local reporting, letters of support, and other documents for grant applications as requested by affordable housing providers. The City recently provided \$1.9M in funding and the site for the recently completed Cherry Creek affordable housing project.

F9. Funding of Affordable Housing is often directed to specific groups such as seniors, veterans, or agricultural workers.

The City of Cloverdale agrees with this finding. The City funding is generally targeted based on Area Median Income (AMI) levels, and additional project funding is usually obtained by the developer with targeted funding/grant opportunities based on type of housing being constructed (senior, agricultural worker, etc.).

F10. Design review and project approval are often slow and very complex, and hinder the development of Affordable Housing.

The City of Cloverdale mostly agrees with this finding and is well aware of the fact that often times the design review and project approval processes can be onerous and hinder development. However, the design review process in the City of Cloverdale has historically been uncomplicated and very seldom, if ever, does it result in requested design changes requiring the applicant to address and resubmit. The City has worked closely with affordable housing providers to expedite processing of applications for affordable housing projects. Both through the use of state ministerial review to reduce processing times and through the use of applicable environmental exemptions staff has looked for ways to efficiently reduce the complexity and increase the efficiency in order to permit affordable housing projects.

F11. The permitting regulations, processes, and fees differ by jurisdiction.

The City of Cloverdale agrees with this finding. Similar to the City's response to F7 above, the differences in permitting regulations and processes amongst the jurisdictions is due in large part to the fact that the vision, character and makeup of each individual jurisdiction is different from one another. These regulations and permitting processes evolve over time along with the evolution of the character, makeup and vision of the community. Regarding differences in fees, jurisdictions typically base their fees on the amount of staff time required to process a particular application/permit. However, each jurisdiction has unique benefits packages for their employees, each jurisdiction typically funds each position at different levels and each jurisdiction is staffed at different levels. Accordingly, fee amounts are going to differ from jurisdiction to jurisdiction. However, it is common to consult with our neighboring jurisdictions when looking to update fees or consider process revisions to learn from what other cities are doing and whether adopting something similar would be beneficial to the City of Cloverdale.



F12. Mitigation fees vary by individual projects and jurisdictions, complicating the building of Affordable Housing.

The City of Cloverdale somewhat disagrees with this finding. It is true that mitigation fees vary by individual projects and jurisdictions. Each individual city has different infrastructure needs, based on the age of the city. Cities with older infrastructure may need to charge more in mitigation fees to continue to provide services to the community. However, the City is unsure that the building of Affordable Housing is therefore complicated as a result of this.

F13. The speed of issuing permits has improved in some jurisdictions, but greater efficiency would help meet the building needs of Sonoma County.

The City of Cloverdale agrees with the finding. The City of Cloverdale recognizes that increased efficiency in review and issuance of permits is vital to projects moving forward. This is especially true with affordable housing projects often with tight timelines related to grant funding or limited resources to go through multiple rounds of review. While there is recognition and steps have been taken to increase processing times, faster more streamlined review is always the objective and there is always room for improvement and the City will continue to look for ways to make the review and approval process as quick as possible. Finally, the City will continue to welcome suggestions on how to speed up the processes in an effort to help meet the needs of Sonoma County.

F14. Payment of in-lieu fees to the housing jurisdiction results in fewer inclusionary Affordable Housing units and houses being built.

The City of Cloverdale agrees with this finding. The cost of residential development continues to increase with minimal if any discount for an affordable versus market rate unit. Despite local increases in in-lieu fees by individual jurisdictions, the fees do not recoup the increasing construction costs. For this reason, in 2018 the City of Cloverdale updated the local in-lieu fee schedule. Although payment of the fees themselves is not enough to result in actual construction of affordable units, the City recognizes that in lieu fees play an important role. In a holistic local housing program, the City needs housing funds to award to affordable housing providers to demonstrate local match and help affordable housing projects be more competitive for outside funding.

F15. Development of commercial projects such as hotels and big box stores is often favored over housing due to lesser demand on public services and increased sales or occupancy tax revenue.

The City of Cloverdale disagrees with the finding. While it is true that hotel and big box retail projects can generate significant tax revenues for cities, there is not a track record of such commercial projects being constructed in the City of Cloverdale. Additionally, while the City of Cloverdale welcomes additional retail services to better suit the residents of the City while also helping to increase the City's tax base, the City recognizes the important need for housing of all types, but especially Affordable Housing.



F16. Recent legislation encourages construction of transit-oriented infill housing but has yet to show a large effect.

The City of Cloverdale agrees with the finding. Sonoma County has not historically had a particularly dense development pattern which has made creation of a transit system more difficult. The commencement of SMART service along the Highway 101 corridor along with various bus service in the County has begun to provide transit options for Sonoma County residents. However, there is great room to expand and augment existing service to make transit a more viable option for residents. Additionally, much of the funding opportunities from the State to facilitate the development of TOD infill housing has been structured in such a way that Sonoma County often does not score competitively. For instance, there are often locational requirements that a development must be located near "high quality transit" to qualify for funding, but the design of SMART on the single rail corridor does not provide the option of service with 15-minute headways. Furthermore, SMART does not currently provide service to Cloverdale.

F17. Changes to city boundaries by annexation of land within their Spheres of Influence could allow the development of more Affordable Housing but is resisted due to the high costs of additional infrastructure.

The City of Cloverdale disagrees with this finding. The cost of infrastructure may be an added challenge for development of these parcels, but the City is supportive of annexations of land within the Sphere of Influence (SOI) for the purpose of industrial, commercial and residential development. The City recognizes that annexations of land within the SOI can result in development of Affordable Housing. Accordingly, since 2016 the City has approved four separate annexations totally approximately 167-acres of land. Two of the annexations also included project approvals for a total of 182 deed restricted affordable units for seniors, agricultural workers, as well as non-targeted low income households, while also preserving a minimum of 29-acres of open space. One of the other annexations resulted in preservation of some existing units and a Zoning Code Amendment to allow for an additional residential use that was previously not permitted, Live-Work Units.

F18. The time periods for which new Affordable Housing units cannot convert to market- rate prices have been lengthened to preserve the units as Affordable.

The City of Cloverdale agrees with this finding. There have not been significant changes to the City of Cloverdale's required affordability term for deed restricted affordable housing. Cloverdale requires a 55-year term of affordability for both for-sale and rental projects. A longer affordability term ensures that the units are kept affordable for a longer period of time which is a plus for ensuring available units to those in need. To date, Cloverdale has not lost any units due to affordability restrictions expiring.

F19. Rehabilitation and the repurposing of existing properties both preserve and increase the supply of Affordable Housing.

The City of Cloverdale agrees with this finding. The City recently partnered with Kingdom Development and The Wallace House and provided funding for a substantial rehab of the City owned Cherry Creek property. Prior to the rehabilitation, the property was developed with a 10-unit low-income rental community. The rehab project of the property is nearing completion and includes a total of 24 low-income units, 2 of which were existing units that were able to be saved and renovated. The 24 units at



the Cherry Creek property provide supportive housing for chronically homeless members of the community or who may be at risk of homelessness.

F20. Inclusive Affordable Housing must be equivalent to market rate units and be dispersed throughout a project making it harder to identify and stigmatize them.

The City of Cloverdale agrees with this finding. The City's inclusionary ordinance (Inclusionary Housing and Density Bonuses, Zoning Ordinance Chapter 18.13) specifies that inclusionary units must be constructed at the same time as the other units in a development project. The rate of completion of affordable and market rate units must be the same as the ratio of affordable and market rate units in the entire project. Inclusionary units must be distributed throughout the development and may not be concentrated in one portion of the development. The appearance of the inclusionary units must be substantially the same as the market rate units or buildings in exterior materials and finish. The developer may reduce either the size and/or provide less expensive interior amenities for the inclusionary units as long as there are not significant differences visible from the exterior of the units and the size, fixtures and design of the units are reasonably consistent with the market rate units in the project. Inclusionary units provided must have a number of bedrooms proportional to the number of bedrooms in the market rate units in the project.

F21. Manufactured and factory-built home construction provide less expensive routes to Affordable Housing without necessarily reducing its quality.

The City of Cloverdale agrees with this finding. There have been great strides in the design and quality of pre-fabricated construction in the last decade. Additionally, there is often an economic efficiency in their production which could make them attractive for affordable housing production.

F22. Design modifications can help make Affordable Housing projects economically viable.

The City of Cloverdale agrees with this finding. There is an unlimited number of design modifications that could be made to a project to help make it more affordable. Just to name a few, the City could relax some design standards such as requirements for sidewalks on both sides of a street, reduced parking/landscaping/fence/lighting standards. Reductions could be allowed in minimum open space requirements, as well as setback, floor area, lot coverage and height standards.

F23. Contrary to commonly expressed fears, Affordable Housing does not usually affect local property values.

The City of Cloverdale agrees with this finding. The City is not aware of any reduction in property values near any existing affordable housing development in the City. Additionally, consistent with the City's inclusionary housing ordinance, outside of 100% affordable housing project, the affordable housing units are scattered in market rate housing development and are indistinguishable from market rate units.

F24. Vacation homes, time shares, Airbnb, Pacaso houses, and vacant houses reduce the number of units available to permanent residents and, by reducing supply, increase the cost of housing.



The City of Cloverdale agrees with this finding. A proliferation of conversions can reduce housing supply which in turn can increase the cost of housing. The City has limited the ability of accessory dwelling units to be used for short term rentals to ensure that new ADUs developed under newer regulations are in fact added to the City's housing supply and not built to facilitate vacation rentals. The City has not seen an undue concentration of vacation rentals to believe that they have caused an acute reduction in housing supply in the City.

City of Cloverdale Responses to Recommendations

R1. By December 31, 2022, Permit Sonoma and the nine Cities should begin to streamline their procedures, from preliminary review through the permitting process, related to the development of Affordable Housing. (F7, F10, F11, F13)

Although this recommendation has been implemented to some extent, the City of Cloverdale realizes that there is always room for improvement and going forward the City will be giving the issues described in this recommendation a higher level of attention and commitment. The City does not require a preliminary review process and does not have a separate design review decision making body from the Planning Commission. In the last year, the City went live with an online permit submittal process in an effort to help streamline the permitting process, which has already proven to be a benefit to the communication process between staff internally as well as between staff and the applicant(s).

The City is currently working on a significant effort to increase transparency and education related to the accessory dwelling unit (ADU) permitting process to respond to community feedback and to facilitate ADU construction as a component of a holistic affordable housing program. This includes partnership and funding for the Napa Sonoma ADU Accelerator program as well as public facing information about resources and the local permitting process.

While the City has been focused on improving our internal processes specifically to facilitate affordable housing production, the City is committed to continuing to find ways to improve efficiency. The City is currently in the process of developing our 6th cycle Housing Element which in part identifies governmental constraints and develops programs to address those constraints. Once adopted the City is committed to implementing those programs and providing annual reporting of the status and resulting affordable housing production toward the increased 6th cycle Regional Housing Needs Allocation.

In response to SB 9 and 10, the City is drafting an amendment to the Municipal Code that would implement the goals and requirements of this recent legislation which will help to streamline development of Affordable Housing as required by SB 9 and 10. The City is also closely following the regional effort that has just completed development of a set of regulations/standards that could be adopted by jurisdictions to implement the state mandates provided by SB 9 and 10.

R2. By December 31, 2022, Permit Sonoma and the nine Cities should meet to consider standardizing their procedures related to the development of Affordable Housing. (F7, F10, F11, F13)

This recommendation is being implemented as Permit Sonoma and the nine Cities held a meeting on July 21, 2022, to discuss ways in which procedures could possibly be standardized. The City will participate in any necessary additional meetings in addition to the ongoing meetings the City already participates in with our Sonoma County partners to discuss issues of regional importance and to keep



apprised of the challenges and policy initiatives that all jurisdictions are facing. This communication and collaboration occurs on a variety of levels and on a regular schedule, including monthly City Manager meetings, monthly Planning Advisory Committee meetings, quarterly City Attorney meetings, and similar across a variety of departments. Of relevance, the Sonoma County jurisdictions have established a housing ad hoc that meets regularly to discuss specific housing issues and share approaches among jurisdictions. The City of Cloverdale remains committed to the collaboration and partnership with our regional partners as it assists in creating efficiencies and learning from the relevant experiences of other Sonoma County jurisdictions. The City will participate in any subsequent meeting(s) with Permit Sonoma and the nine Sonoma County cities to discuss the findings and recommendations of the Grand Jury Report. However, the level or appropriateness of standardizing procedures related to the development of affordable housing remains unknown given the localized needs and community vision of each jurisdiction.

R3. By December 31, 2022, Permit Sonoma and the nine Cities should meet to discuss the coordination of fee reduction standards for Affordable Housing throughout the County. (F11, F12, F14)

This recommendation is being implemented to the extent possible. The nine Cities met on July 21, 2022, and this topic of coordinating fee reduction standards amongst all Sonoma County jurisdictions will continue to the extent possible within the timeframe provided. The City of Cloverdale has an ongoing practice of meeting with our Sonoma County partners to discuss issues of regional importance and to keep apprised of the challenges and policy initiatives that all jurisdictions are facing. This communication and collaboration happens on a variety of levels and on a regular schedule, including monthly City Manager meetings, monthly Planning Advisory Committee meetings, quarterly City Attorney meetings, and similar across a variety of departments. The Sonoma County jurisdictions have established a housing ad hoc that meets regularly to discuss specific housing issues and share approaches among jurisdictions, and for all meeting going forward through the timeframe provided above will appropriately not continue to be an ad hoc group meeting. The City remains committed to the collaboration and partnership with our regional partners as it assists in creating efficiencies and learning from the relevant experiences of other Sonoma County jurisdictions. The City will participate in any additional meeting(s) with Permit Sonoma and the nine Sonoma County cities to discuss the findings and recommendations of the Grand Jury Report. However, the level or appropriateness of coordinating fee reduction standards for affordable housing remains unknown given the localized needs of each jurisdiction, parameters of each jurisdictions existing impact fee programs as well as the differences in land costs between jurisdictions.

As part of the City of Cloverdale's current Housing Element update the City will be including a program in the draft Housing Element to reevaluate the City's development impact fee schedule to look for ways to incentivize housing and particularly affordable housing. Following adoption of the Housing Element and updated General Plan the City will consider initiation of a fee study to identify efficiencies as applicable.

R4. By December 31, 2022, Permit Sonoma and the nine Cities should identify properties within their jurisdictions and Spheres of Influence that could support the construction of infill housing and accessory dwelling units. (F1, F2, F3, F4, F16, F17)

The recommendation has been implemented. The City of Cloverdale and all of the nine Sonoma County cities have General Plans that include land use designations for all properties within each cities' Urban Growth Boundaries. A residential land use designation indicates that the City has previously analyzed



and identified the property as appropriate to support the construction of residential development. Additionally, the City has adopted ADU regulations that go beyond mandates from the State of California by allowing for not 1 but 2 ADUs per property while allowing ministerial review and permitting of ADUs on all single family and multi-family parcels and all parcels already developed with a residential use regardless of zoning. The City's ADU ordinance minimizes setbacks and doesn't require any parking for the new ADU or replacement parking for garage conversions for the main dwelling. No impact fees are collected for ADUs that are 750 square feet or less in size. Furthermore, the City is in process of updating the Housing Element, during that process, opportunity sites for housing are identified.

R5. By December 31, 2022, Permit Sonoma and the nine Cities should identify properties within their jurisdictions and Spheres of Influence that are likely opportunities for rehabilitation or repurposing to increase the availability of Affordable Housing. (F16, F19, F22)

This recommendation has been partially implemented as the City is nearing completion on a rehabilitation/redevelopment project at a City owned low-income housing property commonly referred to as the Cherry Creek property. Prior to redeveloping the property, 10 units existed, many of which were in need of being completely replaced. The project is nearing completion and includes a total of 24 low-income units, 2 of which were existing units that were able to be saved and renovated. The 24 units at the Cherry Creek property provide supportive housing for chronically homeless members of the community or who may be at risk of homelessness. Although this is one example of how this recommendation has already been implemented in Cloverdale, the City will strive to identify additional properties within the Sphere of Influence prior to the timeframe provided above. Furthermore, the City is in process of updating the Housing Element, during that process, opportunity sites for housing are identified.

The city does not have an active program or dedicated funding source currently, but as state and federal funding for this type of program becomes available, the city works with community partners to secure funding and pursue opportunities. An example is the current the tax credit financing programs for affordable housing. The City worked with three separate developers of affordable housing to secure tax credit financing for the construction of over 200 affordable units.

R6. By June 1, 2023, Permit Sonoma and the nine Cities should develop permit ready accessory dwelling unit and junior accessory dwelling unit plans. (F1, F2, F3, F4, F5, F7, F10, F11, F13, F21, F22)

This recommendation has been implemented as the Napa Sonoma ADU Center recently launched the Napa Sonoma ADU Standard Plans Program in an effort to accelerate production of ADUs throughout both Napa and Sonoma Counties. The Napa Sonoma ADU Center has collaborated with all nine Sonoma County cities and Permit Sonoma to compile each jurisdiction's ADU regulations, fee structure, and permitting process. Additionally, the organization has compiled a wide range of ADU plans that are offered for a reduced cost through licensing with the architect. The City of Cloverdale is contributing financially, as many Sonoma County cities also contributed, to the ongoing operation of the organization.

R7. By December 31, 2022, Permit Sonoma and the nine Cities should discuss integration of preliminary design review committees with their planning commissions to help expedite the construction of Affordable Housing. (F1, F2, F3, F4, F5, F7, F10, F11, F13, F19, F20, F21, F22)



This recommendation has been implemented as the nine Cities held a meeting on July 21, 2022, and discussed existing procedures in place in each jurisdiction and how each jurisdiction who has not already done so could integrate these and similar committees/commissions where they exist. The City of Cloverdale does not have a separate design review decision making body aside from the Planning Commission. The Planning Commission is authorized to approve major design review applications, where applicable. Furthermore, preliminary design review is not required and is a process that is an option available at the applicant's request.

R8. By December 31, 2022, Permit Sonoma and the nine Cities should review their permitting requirements to allow nontraditional options such as manufactured homes, factory built homes, and tiny houses to increase housing supply. (F1, F2, F3, F4, F5, F10, F11, F13, F21, F22)

This recommendation has been implemented to the fullest extent possible. While the City's current regulations allow manufactured homes and factory built homes, most units that are commonly referred to as "tiny homes" likely need some slight modifications to the structures so that they comply with all current CA Building Code and Fire Code regulations and standards.