

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT**

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September 23, 2024

Chris Soriano, City Planner
Community Development Department
City of Arvin
200 Campus Drive
Arvin, CA 93203

Dear Chris Soriano:

RE: Review of Arvin's Accessory Dwelling Unit (ADU) Ordinance under State ADU Law (Gov. Code, §§ 66313 - 66342)

Please Note: As of March 25, 2024, with the Chaptering of Senate Bill (SB) 477 (Chapter 7, Statutes of 2024), the sections of Government Code relevant to State ADU and JADU Law have been re-numbered (Enclosure 1).

Thank you for submitting the City of Arvin (City) accessory dwelling unit (ADU) Ordinance No. 2023-486 (Ordinance), adopted October 24, 2023, to the California Department of Housing and Community Development (HCD). The Ordinance was received on December 26, 2023. HCD has reviewed the Ordinance and submits these written findings pursuant to Government Code section 66326, subdivision (a). HCD finds that the Ordinance fails to comply with State ADU and JADU Law in the manner noted below. Pursuant to Government Code section 66326, subdivision (b)(1), the City has up to 30 days to respond to these findings. Accordingly, the City must provide a written response to these findings no later than October 23, 2024.

The Ordinance addresses many statutory requirements; however, HCD finds that the Ordinance does not comply with State ADU Law as follows:

1. *Statutory Numbering* - The Ordinance contains several references to code sections that were deleted by SB 477, effective March 25, 2024. These include Government Code sections 65852.2, 65852.22 and 65852.26. The contents of these sections were relocated to Government Code, Title 7, Division 1, Chapter 13 (sections 66310-66342, see Enclosure). The City must amend the Ordinance to refer to the correct code sections.
2. Sections 17.51.020, 17.51.030, 17.51.120.B, 17.51.120.E – *Administrative Permit Process* – Section 17.51.020 of the Ordinance states, “An Administrative Permit in compliance with Chapter 17.05 is required for ADUs along with a Building Permit” and it “shall be considered and approved ministerially without discretionary review or a hearing.” Section 17.51.030 of the Ordinance also makes several references to the Administrative Permit requirement. Section

17.51.120.B of the Ordinance states, “An administrative permit shall be required for the creation of a JADU.” Section 17.51.120.E of the Ordinance states: “Fees for a JADU shall be established by the City Council and said fees shall be, but not limited to, Administrative Permit Application, Building Plan Check Fees, Building Permit Fees, and state mandated fees relating to the issuance of building permits.” Arvin Municipal Code (AMC) section 17.05.030 describes the required findings to approve an Administrative Permit, including: “That the proposed use will be harmonious with existing structures and uses of land in the vicinity.”

However, “A permit application for an accessory dwelling unit or a junior accessory dwelling unit shall be considered and approved ministerially without discretionary review or a hearing, notwithstanding Section 65901 or 65906 or any local ordinance regulating the issuance of variances or special use permits.”¹ Additionally, “objective standards” are defined as: “standards that involve no personal or subjective judgment by a public official and are uniformly verifiable by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant or proponent and the public official prior to submittal.”² Ministerial approval must only be based on objective standards, but some of the required findings for an Administrative Permit, are not objective. The Administrative Permit process is not ministerial, it is discretionary. Therefore, the Ordinance contradicts itself when it says an Administrative Permit is required for an ADU or JADU and the review must be ministerial. The review of an ADU or JADU application must be ministerial, but that cannot be accomplished through the current Administrative Permit process. Therefore, the City must amend the Ordinance to delete the requirement for an Administrative Permit and associated fees for ADUs and for JADUs.

3. Section 17.51.020.B.1 – *Review Process* – The Ordinance states, “Should the permit application to create an ADU be submitted concurrently with a permit application to create a new single-family dwelling on the lot, in which case the City shall not **act on** the ADU permit application until the City **acts on** the permit application for the new single-family dwelling unit; or The applicant requests a delay, in which case the sixty (60)-day time period shall be tolled for the period of the delay. If the City has not **acted upon** the completed application for the ADU within 60 days, and neither of the above exceptions are met, then the application for the ADU shall be deemed approved” (emphasis added). However, Government Code section 66317, subdivision (a), uses the phrase “approve or deny” instead of “act on”. Additionally, “If a permitting agency denies an application for an accessory dwelling unit or junior accessory dwelling unit pursuant to subdivision (a), the permitting agency shall, within the time period described in subdivision (a), return in writing a full set of comments to the applicant with a list of items that are defective or deficient and a description of how the application can be remedied by the applicant.”³ State ADU Law uses the

¹ Gov. Code, § 66317, subd. (a).

² Gov. Code, § 66313, subd. (h).

³ Gov. Code, § 66317, subd. (b).

phrase “approve or deny” so that local agencies refrain from other actions that could delay ADU approval beyond the timeframes established by law. The law also requires a full set of comments to reduce the likelihood that an applicant would have to resubmit an ADU application multiple times. Therefore, the City must amend the Ordinance to replace phrases like “act on” with “approve or deny” and to require a detailed set of comments in cases where an application is denied.

4. Section 17.51.020.C – *Development Standards for Statewide Exemption ADUs* – The Ordinance states, “ADU shall be subject to this section and under subdivision (e) of Government Code 65852.2 shall not be subject to design and development standards except for those that are noted in this Chapter.” However, Government Code section 65852.2, subdivision (e)(1) has been renumbered. The new section states: “Notwithstanding Sections 66314 to 66322, inclusive, a local agency shall ministerially approve an application for a building permit within a residential or mixed-use zone to create any of the following:”⁴ and lists the four types of statewide exemption ADUs, two of which can be combined with a JADU. ADUs approved under section 66323 are not subject to development standards which conflict with section 66323. Therefore, the City must amend the Ordinance to note that ADUs approved under section 66323 are not subject to conflicting development standards.

5. Section 17.51.050 & 17.51.110.L – *Number and Types of ADUs Allowed* – Section 17.51.050 of the Ordinance states, “A. Lots with a Single-Family Dwelling. The following number and types of ADUs shall be allowed per lot that is zoned to allow single-family residential uses and includes a proposed or existing single-family dwelling. 1. One (1) attached ADU: **or** 2. One (1) detached ADU; and 3. One (1) JADU (See Section 17.51.120)” (emphasis added). The Ordinance continues regarding lots with multifamily dwellings: “Conversion of non-livable spaces to create ADU(s). At least one (1) ADU within the portions of existing multi-family structures, from the conversion of non-Livable area shall be allowed per lot that is zoned to allow multi-family residential uses and includes an existing multi-family structure **so long as** it does not exceed 25 percent of the total number of existing dwelling units. ADUs within multi-family structures must be converted from non-livable areas and **if no non-livable areas exist no ADUs will be permitted**” (emphasis added). Section 17.51.110.L of the Ordinance states, “A lot where there are currently multiple detached single-family dwellings is eligible for creation of **one ADU per lot** by converting space within the proposed or existing space of a single-family dwelling or existing structure and by building a new detached ADU subject to certain development standards”(emphasis added). “Notwithstanding Sections 66314 to 66322, inclusive, a local agency shall ministerially approve an application for a building permit within a residential or mixed-use zone to create any of the following: (1) One accessory dwelling unit and one junior accessory dwelling unit per lot with a proposed or existing single-family dwelling...(i) The accessory dwelling unit or junior accessory dwelling unit is within the proposed space of a single-family

⁴ Gov. Code, § 66323, subd. (a).

dwelling or existing space of a single-family dwelling or accessory structure.” Paragraph (2) permits “[o]ne detached, new construction, accessory dwelling unit that does not exceed four-foot side and rear yard setbacks.”⁵

The use of the term “any” followed by an enumeration of by-right ADU types permitted means that any of these ADU types can be combined on a lot zoned for single-family dwellings. This permits a homeowner, who meets specified requirements, to create one converted ADU; one detached, new construction ADU; and one JADU. Thus, if the local agency approves an ADU that is created from existing (or proposed) space, and the owner subsequently applies for a detached ADU (or vice versa) that meets the size and setbacks pursuant to the subdivision, the local agency cannot deny the application, nor deny a permit for a JADU under this section.

This subdivision applies equally to ADUs created pursuant to Government Code section 66323, subdivisions (a)(3) and (a)(4), on lots with proposed or existing multifamily dwellings. Limiting single-family lots to one ADU would prevent property owners from creating ADUs by-right under section 66323. Limiting multifamily lots to either conversion ADUs or detached ADUs would prevent property owners from creating ADUs by-right under section 66323. The phrase “so long as” in bold above is unlawful because one multifamily conversion ADU must always be allowed in non-habitable space, despite the 25 percent calculation (i.e., if there were two or three multifamily primary units, one multifamily conversion ADU would still be allowed). The phrase “if no non-livable areas exist no ADUs will be permitted” in bold above is unlawful because two multifamily detached ADUs would still be permissible in the scenario described. Therefore, the City must amend the Ordinance to allow all the ADUs which are permissible under Government Code section 66323.

6. Section 17.51.060.A.3 – *Distance Between Buildings* – The Ordinance states, “Space Between Buildings shall be established in the applicable zone district.” However, Government Code section 66323, subdivision (a), prohibits the application of conflicting development standards to statewide exemption ADUs. For other ADUs, the distance between buildings requirements may be applied, but those requirements are not specifically cited in the Ordinance, which creates confusion for people who are unfamiliar with the City’s zoning code. Therefore, the City must amend the Ordinance to note that statewide exemption ADUs approved under section 66323 are exempt from distance between buildings requirements. The City should also amend the Ordinance to cite the code sections where the specific requirements for distance between buildings are located.

⁵ Gov. Code, § 66323, subds. (a)(1) - (a)(2).

7. Section 17.51.060.B.2 – *Exemption from Development Standards* – The Ordinance states, “The maximum floor area of an attached ADU shall not exceed 50 percent of the floor area of the existing primary dwelling for an attached ADU but is permitted to be at least 800 square feet.” However, a local agency shall not establish by ordinance, “Any requirement for a zoning clearance or separate zoning review or any other minimum or maximum size for an accessory dwelling unit, size based upon a percentage of the proposed or existing primary dwelling, or limits on lot coverage, floor area ratio, open space, front setbacks, and minimum lot size, for either attached or detached dwellings that does not permit at least an 800 square foot accessory dwelling unit with four-foot side and rear yard setbacks to be constructed in compliance with all other local development standards.”⁶ The quoted section of the Ordinance is correct. However, Government Code section 66321, subdivision (b)(3) exempts certain ADUs from more than just a maximum size based on a percentage of lot area. Therefore, the Ordinance should be amended to note the full range of development standards that certain ADUs are exempt from under section 66321.
8. Section 17.51.060.C – *Height Limits* – The Ordinance states, “All ADUs shall comply with the minimum height restrictions as established in the applicable zone district.” However, a local agency shall not establish, “Any height limitation that does not allow at least the following, as applicable...”⁷ and lists four different scenarios with different ADU height limits. Additionally, “No local ordinance, policy, or regulation, other than an accessory dwelling unit ordinance consistent with this article shall be the basis for the delay or denial of a building permit or a use permit under this section.”⁸ The Ordinance does not state what the applicable ADU height limits are, nor does it cite the code sections where the height limits are listed. Therefore, the City must amend the Ordinance to specifically cite the code sections with all the referenced height limits and if any of them are more restrictive than those allowed by Government Code section 66321, subdivision (b)(4), the City must also amend the Ordinance to comply with subdivision (b)(4).
9. Section 17.51.060.D.1 – *Front Setbacks* – The Ordinance states, “All ADUs shall meet the minimum front yard setback as established in the applicable zone district.” However, Government Code sections 66321, subdivision (b)(3) and Government Code section 66323, subdivision (a), require local agencies to approve ADUs regardless of front setback requirements, when certain conditions are met. The Ordinance does not make the required exceptions from front setback requirements. Therefore, the City must amend the Ordinance to exempt ADUs meeting the criteria of sections 66321 and 66323 from front setback requirements.

⁶ Gov. Code, § 66321, subd. (b)(3).

⁷ Gov. Code, § 66321, subd. (b)(4).

⁸ Gov. Code, § 66317, subd. (c).

10. Section 17.51.060.D.2 – *Corner Lot Setbacks* – The Ordinance states that, “Corner yard setback shall be six (6) feet” and “Corner Rear Yard Setback for corner lot shall be a minimum of six (6) Feet.” However, “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.”⁹ State ADU Law does not allow local agencies to impose side or rear setback requirements greater than four feet on lots inland of the Coastal Zone. Therefore, the City must amend the Ordinance to delete the six-foot side and rear setback requirements for corner lots.
11. Section 17.51.060.E.3 – *Exceptions to Parking Requirements* – The Ordinance states, “No parking shall be required for ADUs in any of the following instances:” and lists five instances. However, parking requirements are prohibited “When a permit application for an accessory dwelling unit is submitted with a permit application to create a new single-family dwelling or a new multifamily dwelling on the same lot, provided that the accessory dwelling unit or the parcel satisfies any other criteria listed in this paragraph.”¹⁰ The Ordinance lacks this exception. Therefore, the City must amend the Ordinance to add the exception from parking requirements cited in this paragraph.
12. Section 17.51.060.F – *Architectural Standards* – The Ordinance states, “The construction of new ADUs shall be subject to Section 17.50.130 Single-family dwellings and mobile homes - Development/Architectural Standards.” AMC section 17.50.130 includes standards for roof overhangs, roofing materials, roof pitch, siding material, minimum square footage, foundations, and deviations. However, “The local agency shall not deny an application for a permit to create an accessory dwelling unit 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.”¹¹ Additionally, an ADU may include an “efficiency unit” as defined in Health and Safety Code section 17985.1.¹² The standards on roof overhangs, materials, pitch, and siding material would be problematic in a case where an applicant was attempting to permit a nonconforming ADU which meets safety standards, since the Ordinance does not make this exception. The Ordinance’s application of a minimum square footage of 775 square feet to ADUs would preclude certain efficiency units that must be allowed, and which may be

⁹ Gov. Code, § 66314, subd. (d)(7).

¹⁰ Gov. Code, § 66322, subd. (a)(6).

¹¹ Gov. Code, § 66322, subd. (b).

¹² Gov. Code, § 66313, subd. (a)(1).

as small as 150 square feet. Therefore, the City must amend the Ordinance to 1) note the exception from development standards cited in this paragraph and 2) exempt ADUs from the minimum floor area of 775 square feet.

13. Section 17.51.060.G – *ADU Entry* – The Ordinance states, “An ADU shall have a separate entry from the primary residence and shall be from the side or rear yard.” However, Government Code section 66323, subdivision (a), exempts statewide exemption ADUs from conflicting development standards. The Ordinance fails to note this exception. Therefore, the City must amend the Ordinance to clarify that statewide exemption ADUs are not subject to this requirement.
14. Section 17.51.060.H – *Consistency with General Plan and Zoning* – The Ordinance states: “An ADU **that conforms to the ordinance** shall be deemed to be an accessory use or accessory building and shall not be considered to exceed the allowable density for the lot upon which it is located and shall be deemed to be a residential use which is consistent with the existing general plan land use and zoning designations for the lot. The ADU shall not be considered in the application of any local ordinance, policy, or program to limit residential growth” (emphasis added). Government Code section 66314, subdivision (c) states an ADU ordinance shall: “Provide that accessory dwelling units do not exceed the allowable density for the lot upon which the accessory dwelling unit is located, and that accessory dwelling units are a residential use that is consistent with the existing general plan and zoning designation for the lot.” State ADU Law makes it clear that subdivision (c) applies to all ADUs, not just conforming ADUs. As noted above, Government Code section 66322, subdivision (b) requires local agencies to approve nonconforming ADUs that do not present a threat to public health and safety. Therefore, the City must amend the Ordinance to state that all ADUs, not just those that conform to the Ordinance, are subject to the protections of Government Code section 66314, subdivision (c).
15. Section 17.51.120 – *One JADU Per Lot* – The Ordinance permits, “...one (1) junior accessory dwelling **units** (JADU) in single-family residential zones” (emphasis added). However, a JADU ordinance shall, “Limit the number of junior accessory dwelling units to one per residential lot zoned for single-family residences with a single-family residence built, or proposed to be built, on the lot.”¹³ In a probable typo, the Ordinance uses the plural “units” after correctly noting the limit of one JADU (“per residential lot” appears directly below in the Ordinance), which could create confusion in the context of the quoted sentence. Therefore, the City should correct the Ordinance to replace “units” with “unit per lot.”

¹³ Gov. Code, § 66333, subd. (a).

16. Section 17.51.120.B.4 – *JADU Attached Garage Conversion* – The Ordinance states, “A permitted JADU shall be constructed within the walls of proposed or existing single-family residence.” However, a JADU ordinance shall, “Require a permitted junior accessory dwelling unit to be constructed within the walls of the proposed or existing single-family residence. For purposes of this paragraph, enclosed uses within the residence, such as attached garages, are considered a part of the proposed or existing single-family residence.”¹⁴ The Ordinance omits the important sentence about an attached garage being eligible for conversion to a JADU. Therefore, the City must amend the Ordinance to note that an attached garage is eligible for conversion to a JADU.
17. Section 17.51.120.B.5 – *JADU Entrances* – The Ordinance states, “The JADU shall provide a separate entrance from the main entrance to the proposed or existing single-family residence.” However, a JADU ordinance shall also include the requirement that “If a permitted junior accessory dwelling unit does not include a separate bathroom, the permitted junior accessory dwelling unit shall include a separate entrance from the main entrance to the structure, with an interior entry to the main living area.”¹⁵ The Ordinance is silent on this issue. Therefore, the City must amend the Ordinance to incorporate the requirement for an interior doorway between the JADU and the main house when the JADU does not have its own bathroom.
18. Section 17.51.120.D – *JADU Approval or Denial* – The Ordinance states, “The **Planning Division shall act on** a completed application to create a JADU within 60 days from the date the local agency receives a completed application if there is an existing single-family dwelling on the lot. If the permit application to create a JADU is submitted with a permit application to create a new single-family dwelling on the lot, the permitting agency may delay **acting on** the permit application for the JADU until the permitting agency **acts on** the permit application to create the new single-family dwelling, but the application to create the JADU shall still be considered ministerially without discretionary review or a hearing.” However, “The **permitting agency shall either approve or deny** the application to create or serve a junior accessory dwelling unit within 60 days from the date the local agency receives a completed application if there is an existing single-family dwelling on the lot. If the permit application to create or serve a junior accessory dwelling unit is submitted with a permit application to create or serve a new single-family dwelling on the lot, the permitting agency may delay **approving or denying** the permit application for the junior accessory dwelling unit until the permitting agency **approves or denies** the permit application to create or serve the new single-family dwelling, but the application to create or serve the junior accessory dwelling unit shall still be considered ministerially without discretionary review or a hearing”¹⁶ (emphasis added). Additionally, “If a permitting agency denies an application for a junior accessory dwelling unit pursuant to subdivision (a), the permitting agency shall, within the time period

¹⁴ Gov. Code, § 66333, subd. (d).

¹⁵ Gov. Code, § 66333, subd. (e)(2).

¹⁶ Gov. Code, § 66335, subd. (a)(2) – (a)(3).

described in subdivision (a), return in writing a full set of comments to the applicant with a list of items that are defective or deficient and a description of how the application can be remedied by the applicant.”¹⁷

State law requires the permitting agency to approve or deny the application, but the Ordinance uses the more ambiguous and misleading phrases “act on,” “acting on” and “acts on” instead. The Ordinance is silent on the requirement to provide a full set of detailed comments necessary to remedy the application if the application is denied. The Ordinance states that the Planning Division must act on the application, but all City departments must review the application concurrently within the timeframes specified in section 66335. For example, the Planning Division may not take the entire allotted time to approve or deny and then pass the application on Building and Safety. Therefore, the City must amend the Ordinance to 1) replace the three inaccuracies of “act on” with “approve or deny”, 2) require a full set of detailed comments necessary to remedy the application in case of denial and 3) clarify that the City as a whole, is bound by the requirements of subdivision (c), as opposed to just the Planning Division.

19. Section 17.51.120.H – *JADU Parking Requirements* – The Ordinance states, “This section shall not be construed to prohibit a local agency from adopting an ordinance or regulation, related to **parking** or a service or a connection fee for water, sewer, or power, that applies to a single-family residence that contains a JADU, so long as that ordinance or regulation applies uniformly to all single-family residences regardless of whether the single-family residence includes a JADU” (emphasis added). However, “This section shall not be construed to prohibit a local agency from adopting an ordinance or regulation related to a service or a connection fee for water, sewer, or power, that applies to a single-family residence that contains a junior accessory dwelling unit, so long as that ordinance or regulation applies uniformly to all single-family residences regardless of whether the single-family residence includes a junior accessory dwelling unit.”¹⁸ State ADU Law amended by SB 897 (Chapter 664, Statutes of 2022), effective January 1, 2023 no longer includes parking. The only remaining part of State JADU Law that mentions parking states, “An ordinance shall not require additional parking as a condition to grant a permit.” Allowing the reference to parking to remain here will create confusion about the applicability of parking requirements in the zoning code that conflict with State JADU Law. Therefore, the City must amend the Ordinance to delete the reference to parking in section 17.51.120.H.

20. Section 17.51.130.C – *Health and Safety Code (HSC) Section 17980.12* – The Ordinance states, “Effective January 1, 2020, Section 17980.12 was added to the Health and Safety Code immediately following Section 17980.11. to read: For purposes of this section, the following terms have the following meanings:” and then goes on to define “junior accessory dwelling unit” and “local agency.” Government Code section 66313 contains these definitions, not HSC section

¹⁷ Gov. Code, § 66335, subd. (b).

¹⁸ Gov. Code, § 66338, subd. (b).

17980.12. Additionally, Ordinance section 17.51.130.D addresses HSC section 17980.12 in detail, starting by repeating the first sentence quoted above. The reference to HSC 17980.12 in section 17.51.130.C creates confusion. Therefore, the City should amend the Ordinance to delete the first sentence, which references HSC section 17980.12.

21. Section 17.51.130.D – *HSC Section 17980.12* – The Ordinance reprints extended portions of HSC section 17980.12 here, regarding a five-year delay in code enforcement for certain ADUs. However, HSC Section 17980.12, subdivision (a)(3) states, “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 a violation on the primary dwelling unit, provided that correcting the violation is not necessary to protect health and safety.” The City has omitted subdivision (a)(3) from the Ordinance. It is either necessary to include HSC section 17980.12 in its entirety in the Ordinance or provide a reference to this imperative section. The City must amend the Ordinance accordingly to reflect the law.

Please note that the City has two options in response to this letter.¹⁹ The City can either amend the Ordinance to comply with State ADU Law²⁰ or adopt the Ordinance without changes and include findings in its resolution adopting the Ordinance that explain the reasons the City believes that the Ordinance complies with State ADU Law despite HCD’s findings.²¹ If the City fails to take either course of action and bring the Ordinance into compliance with State ADU Law, HCD must notify the City and may notify the California Office of the Attorney General that the City is in violation of State ADU Law.²²

HCD appreciates the City efforts in the preparation and adoption of the Ordinance and welcomes the opportunity to assist the City in fully complying with State ADU Law. Please feel free to contact David Barboza, of our staff, at (916) 907-3002 or at david.barboza@hcd.ca.gov.

Sincerely,



Jamie Candelaria
Senior Housing Accountability Manager
Housing Policy Development Division

¹⁹ Gov. Code, § 66326, subd. (c)(1).

²⁰ Gov. Code, § 66326, subd. (b)(2)(A).

²¹ Gov. Code, § 66326, subd. (b)(2)(B).

²² Gov. Code, § 66326, subd. (c)(1).

State ADU/JADU Law Statutory Conversion Table

New Government Code Sections	Previous Government Code Sections
Article 1. General Provisions	
66310	65852.150 (a)
66311	65852.150 (b)
66312	65852.150 (c)
66313	General Definition Section 65852.2 (j) 65852.22 (j)
Article 2. Accessory Dwelling Unit Approvals	
66314	65852.2(a)(1)(A), (D)(i)-(xii), (a)(4)-(5)
66315	65852.2 (a)(8)
66316	65852.2 (a)(6)
66317	65852.2 (a)(3), (a)(7)
66318	65852.2 (a)(9), 65852.2 (a)(2)
66319	65852.2 (a)(10)
66320	65852.2 (b)
66321	65852.2 (c)
66322	65852.2 (d)
66323	65852.2 (e)
66324	65852.2 (f)
66325	65852.2 (g)
66326	65852.2 (h)
66327	65852.2 (i)
66328	65852.2 (k)
66329	65852.2 (l)
66330	65852.2 (m)
66331	65852.2 (n)
66332	65852.23.
Article 3. Junior Accessory Dwelling Units	
66333	65852.22 (a)
66334	65852.22 (b)
66335	65852.22 (c)
66336	65852.22 (d)
66337	65852.22 (e)
66338	65852.22 (f)-(g)
66339	65852.22 (h)
Article 4. Accessory Dwelling Unit Sales	
66340	65852.26 (b)
66341	65852.26 (a)
66342	65852.2 (a)(10)