



September 4, 2024

Chris Bourquin, Chief of Police
Del Rey Oaks Police Department
650 Canyon Del Rey Road
Del Rey Oaks, CA 93940

Re: CLETS Audit Findings for ORI# CA0270200

Dear Chief Bourquin,

The purpose of this letter is to present the results of your agency's recent audit of the California Law Enforcement Telecommunications System (CLETS) Security Audit.

Pursuant to state and federal requirements, the California Department of Justice (DOJ), Client Services Program audits all agencies which utilize the CLETS. Audits are conducted at least triennially. The CLETS assessment covers a range of topics including an administrative review of policies, user/agency agreements, completion of required training and security and the assigned CLETS Field Representative conducts an on-site inspection. The DOJ access to applicable agency information is addressed in the CLETS Policies, Practices, and Procedures, Section 1.6.3, Audits and Inspections. The goal of the audit process is to help ensure criminal justice information is being handled securely and in compliance with applicable requirements.

CLETS Audit Questionnaire Findings: In Compliance

We commend your compliance with the CLETS requirements. I would like to thank your ACC for the coordination and effort to ensure compliance for your agency. If you have any questions or need additional information regarding the audit process, contact CLETS Field Representative Sarah Wesley at (916) 210-2004 or by email at Sarah.Wesley@doj.ca.gov

Sincerely,

Elisa Webb

ELISA WEBB, Staff Services Manager
CLETS Audits & Inspections Section
Justice Data & Investigative Services Branch

For **ROB BONTA**
Attorney General



MST HIGHLIGHTS
Board of Directors Meeting
September 9, 2024

RECOGNIZED AUGUST EMPLOYEE OF THE MONTH

The MST Board adopted Resolution 2025-03 recognizing Dalia Lopez, Coach Operator, as the August 2024 Employee of the Month for her outstanding contribution to MST and to the entire community.

RECOGNIZED SEPTEMBER EMPLOYEE OF THE MONTH

The MST Board adopted Resolution 2025-04 recognizing Jacob Huggins, IT Specialist, as the September 2024 Employee of the Month for his outstanding contribution to MST and to the entire community.

THE WRIGHT WAY AWARD WINNERS RECOGNITION

The MST Board recognized thirty-eight (38) Coach Operators who received the new MST Wright Way Award for being safe while providing outstanding customer service. To be eligible for this award, Coach Operators had to have no safety related incidents and/or accidents, no valid customer complaints and no official discipline during the fiscal year.

SUSTAINABLE TRANSPORTATION PLANNING GRANT AWARD

The MST Board approved Resolution 2025-05 authorizing the General Manager/CEO or their designee to execute grant documents for Sustainable Transportation Planning Grant Program Funds for the East Alisal Bus Rapid Transit and Salinas Transit Center Relocation Study.

GOODYEAR TIRE AND RUBBER COMPANY TIRE LEASE SERVICE AND SUPPORT

The MST Board authorized the General Manager/CEO or their designee to enter into a three-year contract with The Goodyear Tire and Rubber Company for tire lease service and support, with the option to extend for one (1) additional two (2) year term, for a total contract amount not to exceed \$1,666,059, including option years.

COMMUTE WITH ENTERPRISE VANPOOL PROGRAM

The MST Board approved the ratification of a contract with Commute with Enterprise, authorized the General Manager/CEO or their designee to extend the vanpool program contract from July 26, 2025, through July 25, 2026, and approved continuing a \$450/month subsidy for each vanpool group for each year of the contract.

MST'S PUBLIC TRANSPORTATION AGENCY SAFETY PLAN

The MST Board approved updates to MST's Public Transportation Agency Safety Plan (PTASP).

MST'S INJURY AND ILLNESS PREVENTION PROGRAM

The MST Board approved updates to MST's Injury and Illness Prevention Program (IIPP).

ON CALL SERVICES IN SOUTH COUNTY TO DISCONTINUE

The MST Board approved to discontinue On Call services in South County effective December 31, 2024.

FY 2023-2025 STRATEGIC PLAN AND ACTION PLAN STATUS UPDATE

The MST Board received the FY2023-2025 strategic plan and action plan status update.

NEXT MST BOARD MEETING

The next regular MST Board meeting is scheduled for October 14, 2024.



TRANSPORTATION AGENCY FOR MONTEREY COUNTY

www.tamcmonterey.org

HIGHLIGHTS

August 28, 2024

TAMC Board Approves Alternative Alignment of the SURF! Busway and Bus Rapid Transit Project

The Transportation Agency for Monterey County's Board of Directors provided direction and feedback allowing the alignment of the SURF! Busway and Bus Rapid Transit (BRT) Project to be moved onto the alignment of the existing rail tracks within the Monterey Branch Line corridor.

California Coastal Commission staff requested the SURF! busway project be realigned onto the existing Monterey Branch Line rail tracks to minimize impacts on Environmentally Sensitive Habitat Areas (ESHA). If this request is not met, the Coastal Commission staff would likely recommend denying the Coastal Development Permit; this would result in the cessation of the SURF! project, undermining years of planning and investments made toward improving regional transit.

The Monterey Branch Line corridor, acquired by TAMC in 2003 with Proposition 116 funds, has been envisioned as a key transportation asset that can support both near-term bus rapid transit and long-term rail service. The corridor has been integral to several planning documents, including the Monterey Bay Area Rail Network Integration Study and the California State Rail Plan, both of which propose a phased approach starting with bus service and transitioning to rail.

The TAMC Board voted to approve the alternative on-tracks alignment, on the condition the California Coastal Commission acknowledge the Monterey Branch Line, including portions owned by Monterey and Seaside, is a historic and future transportation corridor; and that the California Coastal Commission agree to not require putting a conservation easement on the Monterey Branch Line right-of-way, which would limit the potential for future rail service.

These conditions underscoring the Transportation Agency for Monterey County Board's support for the immediate benefits for the traveling public anticipated from the SURF Busway project while preserving the Monterey Branch Line corridor for future of rail service.

TAMC Board Receives Update on US 101 South of Salinas Project

The US 101 South of Salinas project is in the planning stage that includes extensive community engagement. At their meeting, TAMC's Board of Directors received an update on the project and feedback received through the project's public outreach efforts.

The intention of the US 101 South of Salinas project is to address safety issues along the corridor between the southern Salinas city limits and Chualar. This corridor experiences collision rates above the state average with concentrations at uncontrolled intersections. One fatality occurs annually, and one severe collision occurs monthly. Another safety concern is the number of uncontrolled railroad crossings along the corridor, which are often the only access to adjacent properties that include some of the world's premier agricultural land.

The two existing US 101 interchanges at Abbot Street and Main Street need significant upgrades to address antiquated features. The project's environmental process is expected to include alternatives to reconstruct both interchanges along with some combination of frontage roads that may maintain access from US 101 to existing properties.

Information collected from the following community stakeholders has guided the project team's approach to developing preliminary alternatives for the environmental process:

- Traffic Safety Alliance
- The Monterey County Farm Bureau
- Chualar community
- East Salinas community
- Property owners
- Business owners
- City of Salinas
- County of Monterey
- Various stakeholders, including the Ag Land Trust

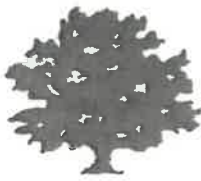
The information provided by the stakeholders are generalized in the following comments:

- Proactively preparing a long-term plan avoids being forced to react to a major incident in the future.
- Minimize the takings of prime agricultural land.

- Adequate access to individual property owners can be obtained through public roads and/or agreements with property owners.
- Current interchanges cannot be closed for extended timelines during construction without alternative access to US 101 being provided.
- The truck traffic in Chualar negatively impacts the community's quality of life and needs to be reduced.
- Traffic congestion at the Airport Blvd interchange is a problem that needs to be addressed. Stakeholders are interested in how this project could improve conditions at the Airport Blvd interchange.

The project team is scheduled to conduct the next series of community engagement activities this fall, while working towards identifying the project alternatives. Identifying feasible alternatives that meet the project purpose and need are an important part of the environmental evaluation that is scheduled to start early next year. The timing for this is to:

- Identify feasible options by end of the year;
- Start environmental work early next year;
- Finish environmental work by end of 2026; and
- Finish final design by end of 2027.



CITY OF DEL REY OAKS

650 CANYON DEL REY BLVD., DEL REY OAKS, CALIFORNIA 93940
PHONE (831) 394-8511 FAX (831) 394-6421

September 13, 2024

Via Email and Regular Mail

Jamie Candelaria (Jamie.candelaria@hcd.ca.gov)
Senior Housing Accountability Unit Manager
Division of Housing Policy Development
California Department of Housing and Community Development
2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833

Re: Response to HCD's Review of Del Rey Oaks' Accessory Dwelling Unit (ADU) Ordinance under State ADU Law (Gov. Code, Code, § 65852.2)

Dear Jamie Candelaria:

Thank you for your review regarding the City of Del Rey Oaks (City) accessory dwelling unit (ADU) Ordinance No. 308 (Ordinance).

Please see below for the City's response to HCD letter dated August 14, 2024, and proposed actions for each of HCD's findings, shown in red. Findings are numbered for ease of reference.

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.

The City will amend the ordinance to refer to the revised code sections.

2. Sections 17.70.020, 17.70.40(A) 17.70.050 (B)(3) - *Definitions & General JADU Requirements* - The Ordinance defines a Junior Accessory Dwelling Unit (JADU) as, "a unit...contained entirely within a single-family residence..." However, this definition omits reference to the conditions required in Government Code 66333, subdivision (d): "For purposes of this subdivision, enclosed uses within the residence, such as attached garages, are considered a part of the proposed or existing single-family residence." The City must amend the Ordinance to note the allowance.

Additionally, Government Code section 66333, subdivision (e) states, "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.” This requirement does not appear in the Ordinance, which must be amended accordingly.

The City will amend the referenced Sections by including language regarding the conditions and requirements in GC 66333, subdivisions (d) and (e).

3. Section 17.70.030 - *Denial* - The Ordinance states that the City shall “approve or deny [an] application within 60 days of receipt of the application...” However, there is no reference to the requirements stated in Government Code section 66317, subdivision (b): “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.” The City must amend the Ordinance accordingly.

The City will amend Section 17.70.030 to reference the communication requirements outlined in GC 66317.

4. Section 17.70.40(B) - *General ADU and JADU Requirements* - The Ordinance states that, “ADUs and JADUs may not be sold separately from the primary dwelling.” However, Government Code section 66341 creates a narrow exception to allow separate conveyance of an ADU to a qualified buyer if the property was built or developed by a qualified nonprofit corporation, among other things. The City must amend the Ordinance to comply with State ADU Law.

The City will revise Section 17.70.040(B) to comply with Government Code 66341 by providing a cross-reference to Government Code 66341, in order to meet the existing requirements for separate conveyance.

5. Section 17.70.040 (C) - *JADU Terms* - The Ordinance states, “ADUs and JADUs shall not be rented for a period of less than thirty (30) days.” However, Government Code section 66333 does not require rental term minimums for JADUs and therefore such a requirement would be inconsistent with State JADU Law. The City must amend the Ordinance accordingly.

Government Code Section 66333 does not prohibit rental term minimums. Therefore, no action is necessary regarding the City’s prohibition of short-term rentals for JADUs. For clarity, the City will incorporate a cross-reference to Municipal Code Title 5, Chapter 5.24 – Short-Term Rentals, Home Sharing.

6. Section 17.70.050 (A)(1) - *Design Standards* - The Ordinance states, “ADUs are subject to the same requirements that apply to primary dwellings on the same lot in the applicable zoning district except as specified in this section.” However, Government Code section 66315 states, “Section 66314 establishes the maximum standards that a local agency shall use to evaluate a proposed accessory dwelling unit on a lot that includes a proposed or existing single-family dwelling. No additional standards, other than those provided in Section 66314, shall be used or imposed, including an owner-occupant requirement, except that a local agency may require that the property may be used for rentals of terms 30 days or longer.”

Additionally, Government Code section 66321, subdivision (b)(3) prohibits, "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."

Lastly, local development standards may not preclude the development of any unit subject to Government Code section 66323. The City must amend the Ordinance to note these exceptions.

The City will make the noted amendments to comply with Government Code 66314, 66315, 66321 and 66323.

7. Section 17.70.050 (C) (1) and (2) - *Height* - The Ordinance states, "1. A single-story attached or detached ADU may not exceed 16 feet in height above grade, measured to the peak of the structure." and "2. A second story or two-story attached ADU addition may be permitted subject to an architectural permit and may not exceed the height of the zoning district. The minimum allowed height shall be 16 feet." However, Government Code section 66321, subdivision (b)(4) states that "Notwithstanding subdivision (a), a local agency shall not establish by ordinance any of the following...(4) Any height limitation that does not allow at least the following, as applicable..." The applicable height limits are 16, 18, 20 or 25 feet. Therefore, the City must amend the minimum height requirements in the Ordinance to comply with State ADU Law. Additionally, the City should align height measurement with the definitions stated in the California Building Code.

The City will revise Section 17.70.050 to comply with GC 66321.

8. Section 17.70.050 (C)(2) - *Architectural Permit* - The Ordinance states, "A second story or two-story attached ADU addition may be permitted subject to an architectural permit..." However, pursuant to Government Code section 65852.2, subdivision (a)(3)(A), "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." The Ordinance should only require ministerial provisions for the approval of accessory dwelling units. The City must amend their Ordinance to comply with State ADU Law.

The City will make the noted revisions along with those noted in Finding #7.

9. Section 17.70.50 (F)(6) - *Parking* - The Ordinance states that, "No on-site parking is required for an ADU in the following cases..." It then describes conditions that match Government Code section 66322, subdivision (a)(1) through (a)(4) but omits reference to the conditions of (a)(5) and (a)(6). Therefore, the City must amend the Ordinance to add the additional parking exceptions.

The City will amend Section 17-70.050 – Parking to include the omitted references.

10. Section 17.70.50 (G)(2) - *Sprinklers* - The Ordinance states, "The installation of fire sprinklers shall not be required in an ADU if sprinklers are not required for the primary residence." However, Government Code sections 66314, subdivision (d)(12) and 66323, subdivision (c) expand on this to require that "The construction of an accessory dwelling unit shall not trigger a requirement for fire sprinklers to be installed in the existing primary dwelling." Therefore, the City must amend the Ordinance to note the allowance.

The City will amend the Ordinance by adding language to note the additional allowance.

Once the HCD acknowledges that our responses and proposed changes outlined in this letter are acceptable, the City plans to initiate the changes in Spring 2025 with Council approval anticipated in Summer 2025.

If there are any questions or clarifications, I can be reached at jguertin@delreyoaks.org or at 831-394-8511.

Sincerely,



John Guertin
City Manager

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

651 Bannon Street, Suite 400
Sacramento, CA 95811
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov



August 14, 2024

John Guertin, City Manager
City of Del Rey Oaks
650 Canyon Del Rey Blvd.
Del Rey Oaks, CA 93940

Dear John Guertin:

**RE: Review of City of Del Rey Oak's Accessory Dwelling Unit (ADU) Ordinance
under State ADU Law (Gov. Code, §§ 66310 – 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 junior accessory dwelling unit (JADU) Law have been re-numbered (Enclosure 1).

Thank you for submitting the City Del Rey Oak's (City) ADU Ordinance No. 308 (Ordinance), adopted October 26, 2021, to the California Department of Housing and Community Development (HCD). HCD has reviewed the Ordinance and submits these written findings pursuant to Government Code section 66326, subdivision (a). HCD finds that the Ordinance does not comply with State ADU and JADU Laws in the manner noted below. Under 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 September 13, 2024.

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

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 17.70.020, 17.70.40(A) 17.70.050 (B)(3) - Definitions & General JADU Requirements* - The Ordinance defines a Junior Accessory Dwelling Unit (JADU) as, "a unit...contained entirely within a single-family residence..." However, this definition omits reference to the conditions required in Government Code 66333, subdivision (d): "For purposes of this subdivision,

enclosed uses within the residence, such as attached garages, are considered a part of the proposed or existing single-family residence." The City must amend the Ordinance to note the allowance.

Additionally, Government Code section 66333, subdivision (e) states, "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." This requirement does not appear in the Ordinance, which must be amended accordingly.

3. Section 17.70.030 - *Denial* - The Ordinance states that the City shall "approve or deny [an] application within 60 days of receipt of the application..." However, there is no reference to the requirements stated in Government Code section 66317, subdivision (b): "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." The City must amend the Ordinance accordingly.
4. Section 17.70.40(B) - *General ADU and JADU Requirements* - The Ordinance states that, "ADUs and JADUs may not be sold separately from the primary dwelling." However, Government Code section 66341 creates a narrow exception to allow separate conveyance of an ADU to a qualified buyer if the property was built or developed by a qualified nonprofit corporation, among other things. The City must amend the Ordinance to comply with State ADU Law.
5. Section 17.70.040 (C) - *JADU Terms* - The Ordinance states, "ADUs and JADUs shall not be rented for a period of less than thirty (30) days." However, Government Code section 66333 does not require rental term minimums for JADUs and therefore such a requirement would be inconsistent with State JADU Law. The City must amend the Ordinance accordingly.
6. Section 17.70.050 (A)(1) - *Design Standards* - The Ordinance states, "ADUs are subject to the same requirements that apply to primary dwellings on the same lot in the applicable zoning district except as specified in this section." However, Government Code section 66315 states, "Section 66314 establishes the maximum standards that a local agency shall use to evaluate a proposed accessory dwelling unit on a lot that includes a proposed or existing single-family dwelling. No additional standards, other than those provided in Section 66314, shall be used or imposed, including an owner-occupant requirement, except that a local agency may require that the property may be used for rentals of terms 30 days or longer."

Additionally, Government Code section 66321, subdivision (b)(3) prohibits, "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."

Lastly, local development standards may not preclude the development of any unit subject to Government Code section 66323. The City must amend the Ordinance to note these exceptions.

7. Section 17.70.050 (C) (1) and (2) - *Height* - The Ordinance states, "1. A single-story attached or detached ADU may not exceed 16 feet in height above grade, measured to the peak of the structure." and "2. A second story or two-story attached ADU addition may be permitted subject to an architectural permit and may not exceed the height of the zoning district. The minimum allowed height shall be 16 feet." However, Government Code section 66321, subdivision (b)(4) states that "Notwithstanding subdivision (a), a local agency shall not establish by ordinance any of the following...(4) Any height limitation that does not allow at least the following, as applicable..." The applicable height limits are 16, 18, 20 or 25 feet. Therefore, the City must amend the minimum height requirements in the Ordinance to comply with State ADU Law. Additionally, the City should align height measurement with the definitions stated in the California Building Code.
8. Section 17.70.050 (C)(2) - *Architectural Permit* - The Ordinance states, "A second story or two-story attached ADU addition may be permitted subject to an architectural permit..." However, pursuant to Government Code section 65852.2, subdivision (a)(3)(A), "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." The Ordinance should only require ministerial provisions for the approval of accessory dwelling units. The City must amend their Ordinance to comply with State ADU Law.
9. Section 17.70.50 (F)(6) - *Parking* - The Ordinance states that, "No on-site parking is required for an ADU in the following cases..." It then describes conditions that match Government Code section 66322, subdivision (a)(1) through (a)(4) but omits reference to the conditions of (a)(5) and (a)(6). Therefore, the City must amend the Ordinance to add the additional parking exceptions.

10. Section 17.70.50 (G)(2) - *Sprinklers* - The Ordinance states, "The installation of fire sprinklers shall not be required in an ADU if sprinklers are not required for the primary residence." However, Government Code sections 66314, subdivision (d)(12) and 66323, subdivision (c) expand on this to require that "The construction of an accessory dwelling unit shall not trigger a requirement for fire sprinklers to be installed in the existing primary dwelling." Therefore, the City must amend the Ordinance to note the allowance.

Please note that the City has two options in response to this letter¹. The City can either amend the Ordinance to comply with State ADU Law² 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 findings³. 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 Law⁴.

HCD appreciates the City of Del Rey Oaks' 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 Mike Van Gorder at mike.vangorder@hcd.ca.gov if you have any questions.

Sincerely,



Jamie Candelaria
Senior Housing Accountability Unit Manager
Housing Policy Development Division

¹ Gov. Code, § 66326, subd. (c)(1).

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

³ Gov. Code, § 66326, subd. (b)(2)(B).

⁴ 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)

