

Public Comment

Katherine Douglas

From: Ian N <iangnewsam@gmail.com>
Sent: Monday, February 23, 2026 12:01 AM
To: sbcob; Kevin Thompson
Cc: Karen Chai
Subject: Supplemental Draft Language – June 9 Hearing (Internal JADU Classification)
Attachments: Supplemental Submission June 9 Hearing APN 107-332-017 - Ian Newsam - Karen Chai.pdf

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Dear Clerk of the Board and Mr. Thompson,

Attached please find a supplemental submission and proposed draft ordinance language for consideration in advance of the June 9 public hearing regarding wastewater classification policy.

The draft language is narrowly limited to Junior Accessory Dwelling Units fully contained within legally established existing habitable space and utilizing the existing wastewater connection. It is intended solely to provide a technical clarification option for Board consideration.

We appreciate the opportunity to present brief comments at the June 9 hearing.

Respectfully,
Ian Newsam

Supplemental Submission for June 9 Hearing

Proposed Clarification Amendment – Classification Alignment with State Housing Law

Laguna County Sanitation District

APN 107-332-017

Date: February 22, 2026

Clerk of the Board
Laguna County Sanitation District

Re: Supplemental Technical Materials – June 9 Hearing – Classification Clarification

Dear Clerk,

This submission is provided in advance of the June 9 hearing for distribution to the Board of Supervisors and relevant District staff.

Ordinance 3130, as amended most recently by Ordinance 5251, establishes wastewater service classifications including single-family dwelling, duplex, apartment/condominium/mobile home, schools, and other users. The classification structure predates the statutory creation of Accessory Dwelling Units (ADUs) and Junior Accessory Dwelling Units (JADUs) under California law beginning in 2016.

State law now provides standardized definitions for ADUs and JADUs, including explicit parameters concerning maximum size, required location within an existing primary structure (for JADUs), prohibition on separate sale, and shared utility infrastructure. These state-defined units did not exist within the regulatory framework at the time the District's original classification structure was adopted.

The attached draft language is narrowly tailored to clarify that a state-defined JADU located entirely within the existing habitable space of a single-family residence and utilizing the same sanitation connection remains within the single-family dwelling classification for wastewater service purposes. The proposed clarification does not alter adopted rate schedules or EDU quantities. It provides definitional alignment between the District's existing ordinance structure and current state housing terminology.

This submission is intended solely to assist the Board in evaluating classification consistency in light of statutory developments since the ordinance's original adoption.

We will appear at the June 9 hearing and will confine oral remarks to a brief technical summary of this submission.

Respectfully submitted,



Ian Newsam c/o Karen
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iangnewsam@gmail.com



Chai Karen Chai
(805) 284-4726
kchai33@gmail.com

CC Kevin Thompson, P.E., Laguna County Sanitation District, kethomp@countyofsb.org

Attachments: Proposed Amendment Summary
Proposed Ordinance Internal JADU Classification Laguna-DRAFT

Proposed Amendment - Summary

Amendment to Article I – Single-Family Dwelling Classification

SECTION 1. Clarification of Classification Terminology

Article I of Ordinance 3130, as amended, is clarified to incorporate current state-defined housing terminology as follows:

For purposes of wastewater service classification and Equivalent Dwelling Unit (EDU) determination, a Junior Accessory Dwelling Unit (JADU), as defined in California Government Code § 65852.22, that:

- (a) Is fully contained within the existing habitable space of a legally established single-family residence;
- (b) Utilizes the primary residence's existing wastewater service connection;
- (c) Does not expand the established habitable building envelope; and
- (d) Is legally subordinate to and inseparable from the primary dwelling unit;

shall be classified within the single-family dwelling category and shall not constitute a separate apartment, multifamily dwelling, or additional EDU classification for wastewater assessment purposes.

SECTION 2. Rate Neutrality

This clarification does not modify any adopted rate amounts, EDU calculations, trunk sewer charges, or service fee schedules. The amendment is technical and definitional in nature and is intended to ensure consistency between District classification terminology and state statutory housing definitions.

SECTION 3. Administrative Verification.

The Laguna County Sanitation District may rely upon documentation issued by Santa Barbara County Planning and Development confirming that a Junior Accessory Dwelling Unit (JADU), as defined in Government Code § 65852.22, is fully contained within legally established existing habitable space of a single-family residence and does not involve installation of an additional sewer lateral or physical wastewater connection.

SECTION 4. No Effect on Detached ADUs or Additional Connections.

Nothing in this Ordinance shall apply to detached Accessory Dwelling Units, newly constructed dwelling units, properties installing additional sewer laterals, or any development creating an additional physical connection to the District's public sewer system. Such properties shall be classified and charged in accordance with existing ordinance provisions.

DRAFT

DRAFT – PROPOSED ORDINANCE LANGUAGE
Submitted for Consideration – Not an Official District Document
Submitted by: Ian Newsam

The Board of Supervisors of the County of Santa Barbara, acting as the Board of Directors of the Laguna County Sanitation District, does ordain as follows:

Section 1.

Section 2 of Article I of Ordinance No. 3130 is amended to read as follows:

Section 2.

The service charge for each single family dwelling and duplex dwelling unit shall be as established by resolution of the Board. For purposes of classification under this Article, a Junior Accessory Dwelling Unit (JADU), as defined in California Government Code section 65852.22, that is fully contained within legally established existing habitable space of a single-family residence, does not expand the previously recognized building envelope, utilizes the existing wastewater service connection of the primary dwelling, and remains legally subordinate to the primary dwelling unit, shall be classified within the single-family dwelling category and shall not constitute a separate dwelling unit or additional Equivalent Dwelling Unit (EDU) for wastewater service assessment purposes.

Section 2.

Except as herein amended, Ordinance Nos. 3130 and 4142 shall remain in full force and effect.

Section 3.

This ordinance shall take effect and be in force THIRTY (30) days from the date of its passage; and before the expiration of FIFTEEN (15) days after its passage, a summary of it shall be published once, with the names of the members of the Board of Directors voting for and against the same, in a newspaper of general circulation published in the County of Santa Barbara.

Katherine Douglas

From: Ian N <iangnewsam@gmail.com>
Sent: Thursday, May 21, 2026 8:03 PM
To: sbcob; Kevin Thompson
Cc: Chris Sneddon; Aaron Hanke; Karen Chai
Subject: HCD Response - Request for Clarification Submission – JADU Classification and Sewer Service Charges – APN 107-332-017 – Karen Chai
Attachments: Gmail - A comment has been posted by an ADU team member on case number ADU0008332.pdf

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Gmail - A comment has been posted by an ADU team member on case number ADU0008332
Hello Kevin, Clerk of the Board, and involved parties,

Attached is a recent response received from California HCD regarding ADU Technical Assistance Case No. ADU0008332.

In relevant part, HCD stated that:

- a JADU is not to be considered a separate or new dwelling unit for purposes of fire and life safety regulations,
- occupancy change may not be imposed solely due to the addition of a JADU,
- and a JADU cannot be designated as an “equivalent dwelling unit” or multifamily dwelling under State ADU law.

While we understand this correspondence is advisory in nature, it appears directly relevant to the District’s current treatment of JADUs within its EDU/multifamily classification framework and associated sewer service fee structure.

We are providing this correspondence for transparency and continuity purposes because it relates directly to the previously submitted materials and concerns provided to the Board involving APN 107-332-017, JADU classification, and associated sewer service charges.

In light of HCD’s response, does the District anticipate taking any action, providing clarification, or reevaluating the current classification approach as it pertains to JADUs?

Sincerely,

Ian Newsam
On behalf of Ms. Karen Chai

Attached:

Gmail - A comment has been posted by an ADU team member on case number ADU0008332



Ian N <iangnewsam@gmail.com>

A comment has been posted by an ADU team member on case number ADU0008332

1 message

Dept. of Housing & Community Development <calhcd@service-now.com>
Reply-To: "Dept. of Housing & Community Development" <calhcd@service-now.com>
To: iangnewsam@gmail.com

Thu, May 21, 2026 at 10:27 AM



A comment has been posted by an ADU team member on case number ADU0008332, submitted on 05/08/2026 05:34:43 AM PDT, by Ian Newsam at iangnewsam@gmail.com.

Good morning Ian,

Thank you for reaching out to HCD's ADU Team and for the documentation regarding your case.

State ADU Law provides that the construction of an ADU/JADU does not constitute a Group R occupancy change under the local building code, unless the local agency makes a written finding based on substantial evidence in the record that the construction of the ADU/JADU could have a specific, adverse impact on public health and safety (Gov. Code, § 66314, subd. (d)(8)).

Additionally, Government Code section 66337, subdivision (a) states that: "For purposes of any fire or life protection ordinance or regulation, a junior accessory dwelling unit shall not be considered a separate or new dwelling unit." This would include occupancy, as that is considered to be a fire regulation. So while the JADU is a dwelling unit, it is not calculated towards the occupancy as one. Therefore, an occupancy change is prohibited as a result of the addition of a JADU to a primary dwelling.

The addition of a JADU to a primary dwelling unit cannot be designated as an "equivalent dwelling unit" or multifamily dwelling since the JADU is not to be considered a separate or new dwelling unit under State ADU Law.

Please feel free to share this correspondence with the District.

Thank you,

5/21/26, 7:31 PM

Gmail - A comment has been posted by an ADU team member on case number ADU0008332

Shasta García
ADU Team

Replies to this message will be processed by the ADU Technical Assistance Portal and Shasta Garcia will be notified of your question or comment

Ref:MSG0341402_pPdHOSkUJWDrSJOVZBv8