

**From:** [DeBaca, Daniela](#)  
**To:** [Brown, Madeline](#)  
**Subject:** FW: [EXTERNAL] Re: Massage Business Community Meeting Invitation  
**Date:** Wednesday, February 26, 2025 4:27:40 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

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**DANIELA DEBACA | Senior Code Enforcement Officer**

Code Enforcement | Neighborhood Revitalization Program

Planning and Economic Development | 100 Santa Rosa Ave. Rm 3 | Santa Rosa, CA 95404

Tel. (707) 543-3463 | Fax (707) 543-3218 | [ddebaca@srcity.org](mailto:ddebaca@srcity.org)



**\*\*\*Please be advised my work hours are Tuesday-Friday, 8am-5pm\*\*\***

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**From:** DeBaca, Daniela  
**Sent:** Friday, January 3, 2025 7:55 AM  
**To:** Krohn, Laura [REDACTED]  
**Subject:** RE: [EXTERNAL] Re: Massage Business Community Meeting Invitation

Hello

I'm happy to answer any questions:

1. What is the primary reason for the proposed changes?  
Last February (2024) members of the community organized a meeting with City officials, representatives, and various organizations to express their concerns about illicit massage businesses that have settled in and the fact that it also involves victims of human trafficking. Since then a multitude of events have taken place such as training, contacts, enforcement actions, inspections, etc and what we have learned is that the current Massage Ordinance was very outdated. It referenced laws that no longer exist (or have been relocated/rewritten) and was lacking in the ability to effectively enforce the issues we were encountering. The revised ordinance will provide more structure that will encourage good behavior and eliminate the bad actors.
2. Will these proposed changes impact rate of pay in any way?  
No, the City does not regulate the rate of pay.
3. Will these proposed changes require specific documentation of certification for providers?

The current ordinance already has a requirement for CAMTC certification for all persons providing services and will remain. This is also a State requirement therefore it cannot be left out.

This is only the tip of the iceberg. I know you (as well as others) will have plenty more questions to come. Our desire is to prevent significant negative impacts on the legitimate businesses operating in good standing which is why we are deeply interested in your perspective and needs. I think you will also be pleased to know that we have carved out some exemptions for businesses such as yours. The primary intent is to discourage and eliminate the bad actors in the community that negatively impact the safety of the surrounding neighborhoods as well as the integrity and safety of the legitimate technicians and establishments. I hope you find this information helpful. If you have any other questions, please feel free to reach out.

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**From:** Krohn, Laura [REDACTED]  
**Sent:** Thursday, January 2, 2025 3:46 PM  
**To:** DeBaca, Daniela <[ddebaca@srcity.org](mailto:ddebaca@srcity.org)>  
**Subject:** Re: [EXTERNAL] Re: Massage Business Community Meeting Invitation

Hello Daniela,

Thank is kind of you to offer to touch base. I only have a couple questions that maybe you can answer and maybe not:

1. What is the primary reason for the proposed changes?
2. Will these proposed changes impact rate of pay in any way?
3. Will these proposed changes require specific documentation of certification for providers?

In health,

Laura Krohn, MPH, CWWS, CWP  
Executive Director, Wellness

**FLAMINGO RESORT**

O:707-526-0529

C: 707-339-1312

[laura.krohn@pyramidglobal.com](mailto:laura.krohn@pyramidglobal.com)



2021 Best Rad Hotel Redesign  
*Sunset Magazine Travel Awards*

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**From:** DeBaca, Daniela <[ddebaca@srcity.org](mailto:ddebaca@srcity.org)>

**Sent:** Thursday, January 2, 2025 2:05 PM

**To:** Krohn, Laura [REDACTED]

**Subject:** RE: [EXTERNAL] Re: Massage Business Community Meeting Invitation

Hi Laura

Thank you for reaching out. What we currently have is still a working draft and I have not yet been authorized to release it to the public. Should I receive the green light before the meeting I will definitely send it over to you. In the mean time, I can be available to chat with you and provide an idea of the substance. If you're interested, let me know a good time and we can schedule a call.

**DANIELA DEBACA | Senior Code Enforcement Officer**

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**From:** Krohn, Laura [REDACTED]

**Sent:** Thursday, January 2, 2025 1:44 PM

**To:** DeBaca, Daniela <[ddebaca@srcity.org](mailto:ddebaca@srcity.org)>

**Subject:** [EXTERNAL] Re: Massage Business Community Meeting Invitation

Hello ,

I am the Exec Dir of Wellness at The Flamingo Resort & Spa. Thank you so much for including me in this important meeting notice!

Can you send the proposed changes to study before the meeting?

In health,

Laura Krohn, MPH, CWWS, CWP  
Executive Director, Wellness

**FLAMINGO RESORT**

O:707-526-0529

C: 707-339-1312

[laura.krohn@pyramidglobal.com](mailto:laura.krohn@pyramidglobal.com)



2021 Best Rad Hotel Redesign  
*Sunset Magazine Travel Awards*

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**From:** DeBaca, Daniela <[ddebaca@srcity.org](mailto:ddebaca@srcity.org)>

**Sent:** Thursday, January 2, 2025 1:05 PM

**Subject:** Massage Business Community Meeting Invitation

Dear Valued Massage Business Owner,

The City of Santa Rosa is committed to supporting legitimate massage businesses while ensuring the safety and well-being of our community. To that end, we are proposing some changes to our city's massage regulations.

We understand that these changes may impact your business, and we want to hear from you. We are committed to being business-friendly and finding solutions that accommodate the legitimate needs of massage businesses to the greatest extent possible while providing an effective enforcement mechanism for illicit massage establishments.

We invite you to attend a community meeting to learn more about the proposed changes and provide your valuable input.

**Meeting Date: January 14th, 2025**

**Time: 5:00 PM to 7:00 PM**

**Location: City Hall Council Chambers, 100 Santa Rosa Ave.**

**(Please be advised the meeting will not be available for viewing online)**

We will share more details about the proposed changes and provide an opportunity for open

discussion.

Your input is crucial to the success of these regulations. We encourage you to attend and share your perspectives.

Although we have made our best effort to locate contact information for all businesses that may be effected, we realize there may be those that we were unable to find or have incomplete information. Please feel free to share this invitation with any colleagues you feel may be interested in attending.

We look forward to seeing you there.

Sincerely,

**DANIELA DEBACA | Senior Code Enforcement Officer**

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***\*\*\*Please be advised my work hours are Tuesday-Friday, 8am-5pm\*\*\****

**From:** [DeBaca, Daniela](#)  
**To:** [Brown, Madeline](#)  
**Subject:** FW: [EXTERNAL] Outcall massges  
**Date:** Wednesday, February 26, 2025 4:28:43 PM  
**Attachments:** [image001.png](#)

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**From:** DeBaca, Daniela  
**Sent:** Monday, January 13, 2025 7:56 AM  
**To:** Mila Samadarshana [REDACTED]  
**Subject:** RE: [EXTERNAL] Outcall massges

Good morning Mila

Thank you for your email. We have made some allowances for out calls (though not using that term) which fall in alignment with the conditions you're addressing. We agree those services are vital and do not want to negatively impact a vulnerable population. Your email is being forwarded to management staff for consideration and input. We do hope to see you at the meeting.

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**From:** Mila Samadarshana [REDACTED]  
**Sent:** Tuesday, January 7, 2025 1:19 PM  
**To:** DeBaca, Daniela <[ddebaca@srcity.org](mailto:ddebaca@srcity.org)>  
**Subject:** [EXTERNAL] Outcall massges

Dear Daniela,

I will be short, I imagine you are receiving a lot of emails. Prohibition of outcall massages will negatively effect many Santa Rosa citizens. I personally work from my office, but do have clients that I visit at home. These are usually people with severe health problems that can not visit my office. They have to stay mostly in bed, have breathing problems or are unable to move. In the past I have had a client at a nursing home. Massages are essencial to those clients as being unable to move freely they develop serious issues which massage helps to regulate. And as aditional benefit it helps them emotionally to recive massage care. Making this option illigal will put those vulnarable clients in a very hard situation. I hope this information is taken in consideration.

With much respect.  
Milla Veretilnyk, CMT

**From:** [DeBaca, Daniela](#)  
**To:** [Brown, Madeline](#)  
**Subject:** FW: [EXTERNAL] Massage Therapy business proposed changes in city regulations and ordinances  
**Date:** Wednesday, February 26, 2025 4:28:27 PM  
**Attachments:** [image001.png](#)

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**From:** DeBaca, Daniela  
**Sent:** Monday, January 13, 2025 8:15 AM  
**To:** susan kirk [REDACTED] Andrea Thompson [REDACTED]  
**Subject:** RE: [EXTERNAL] Massage Therapy business proposed changes in city regulations and ordinances

Good morning Ms. Kirk

Thank you for your email. We have made some allowances for out calls (though not using that term) which fall in alignment with the conditions you're addressing. We agree those services are vital and do not want to negatively impact a vulnerable population. Your email is being forwarded to management staff for consideration and input. Unfortunately, we are unable to provide a copy of the ordinance at this time due to it still being in draft form and not yet approved for public dissemination. The major change is the requirement to obtain a Massage Establishment Certificate and the application process. For legitimate businesses such as yours, the required information is not expected to have a negative impact. Our main objective is to eliminate the bad actors and prevent future establishments from (very easily) coming into our community. We do hope to see you at the meeting. If you would like to chat, please feel free to contact me.

**DANIELA DEBACA | Senior Code Enforcement Officer**

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**From:** susan kirk [REDACTED]  
**Sent:** Tuesday, January 7, 2025 10:36 AM  
**To:** DeBaca, Daniela <[ddebaca@srcity.org](mailto:ddebaca@srcity.org)>; Andrea Thompson [REDACTED]  
**Subject:** [EXTERNAL] Massage Therapy business proposed changes in city regulations and ordinances

Hello Daniela,

I left a message for you earlier at your office but realized it may no longer be necessary, as I received an email from CAMTC shortly after that included your contact information.

We are currently adjusting our schedules to attend the upcoming meeting. In the meantime, we would greatly appreciate it if you could share the proposed changes to the current regulations. We have participated in previous meetings with CAMTC, the city council, and the police departments, and we want to stay informed about any updates. It would be helpful to know what the changes are before the meeting.

We are particularly concerned that some of the proposed regulations might negatively impact legitimate businesses like ours. One issue that stands out is the proposed restriction on outcall visits.

Such a change would significantly affect many legitimate businesses, especially those like ours that provide medical massage services. It would also impact clients who are homebound due to illness or disability, as well as others who prefer at-home massage services for convenience and relaxation. For many, the ability to receive care at home is not just a preference but a necessity.

We strongly oppose this regulation, as it would limit access to essential services for those who need them most. Outcall services are a vital part of our industry, supporting both health and well-being.

Could you please share the details of any other proposed changes so that we can come to the meeting prepared?

Thank you for addressing these important issues. We understand there is much to consider, and we appreciate the time and effort involved in this process.

Susan Kirk  
Andrea Thompson

**Susan Kirk, CMT**  
**Medical Massage Therapist/Instructor**

**Village Therapeutics Collective**

**707\*570\*2025**

**villagetherapeutics.com**

**From:** [DeBaca, Daniela](#)  
**To:** [Brown, Madeline](#)  
**Subject:** FW: [EXTERNAL] SR City Mobile Massage  
**Date:** Wednesday, February 26, 2025 4:28:57 PM  
**Attachments:** [image001.png](#)

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**From:** DeBaca, Daniela  
**Sent:** Friday, January 10, 2025 12:42 PM  
**To:** T Fallon [REDACTED]  
**Subject:** RE: [EXTERNAL] SR City Mobile Massage

Good afternoon Ms. Fallon

Thank you for your response. Your input in this area is very important to us and we are interested in hearing your perspective. I hope that you will be in attendance so that we may continue a more detailed dialogue with you and others in your situation. The ordinance has not yet been finalized therefore your input has the potential to be impactful. We look forward to seeing you there.

**DANIELA DEBACA | Senior Code Enforcement Officer**

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-----Original Message-----

From: T Fallon [REDACTED]  
Sent: Friday, January 10, 2025 10:49 AM  
To: DeBaca, Daniela <[ddebaca@srcity.org](mailto:ddebaca@srcity.org)>  
Subject: [EXTERNAL] SR City Mobile Massage

Dear Reader,

I am a mobile massage therapist in the city of Santa Rosa CA.

I have an Associate Degree in Nursing from the SRJC. I hold the CAMTC certificate and was notified by CAMTC via email that the city of Santa Rosa will be holding a meeting this January 14th. regarding mobile massage therapy.

I ask that you continue to allow Mobile Massage Therapy in SR City to CAMTC certificate holders.

This is my livelihood. I recently closed my brick and mortar massage business as the overhead was too much to bear and have gone back to having a mobile massage business in the city of Santa Rosa CA.

I feel the scrutiny of CAMTC and their requirements to obtain and hold their certification should be considered and held in high regard when making your decision as to continue to allow mobile massage therapy in the city of Santa Rosa CA.

Thank you in advance for your consideration in this matter. It is my hope that you will continue to allow Mobile Massage Therapy in Santa Rosa.

Respectfully,

Teresa Fallon, CMT

CAMTC#85355

Associate Degree Nursing

Sent from my iPhone

**From:** [DeBaca, Daniela](#)  
**To:** [Brown, Madeline](#)  
**Subject:** FW: [EXTERNAL] Massage Establishment Ordinance Update  
**Date:** Wednesday, February 26, 2025 4:30:51 PM  
**Attachments:** [image001.png](#)

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---

**From:** DeBaca, Daniela  
**Sent:** Wednesday, January 22, 2025 5:24 PM  
**To:** Ron L [REDACTED]  
**Cc:** Kirk, Lou <[lkirk@srcity.org](mailto:lkirk@srcity.org)>  
**Subject:** RE: [EXTERNAL] Massage Establishment Ordinance Update

Good evening Mr. Lowe,

Thank you for your insight, it was very helpful. We are currently drafting changes to accommodate uses such as yours and will be recommending the same to the City Council in March. Your input and that of your colleagues has been critical to the development of this ordinance. We are accepting input through the month of February. If you or your colleagues have any further thoughts, ideas, insight, please do not hesitate to communicate with us. We have also developed a list of those requesting to receive a copy of the new ordinance draft which you have been added to. Once it is complete, we will be sure to send it out.

Thanks again. Hope you have an enjoyable evening.

**DANIELA DEBACA | Senior Code Enforcement Officer**

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**From:** Ron L [REDACTED]  
**Sent:** Tuesday, January 21, 2025 9:14 AM  
**To:** DeBaca, Daniela <[ddebaca@srcity.org](mailto:ddebaca@srcity.org)>  
**Subject:** [EXTERNAL] Massage Establishment Ordinance Update

Dear Ms DeBaca,

I hope this email finds you well. I recently attended the online meeting discussing the **Massage Establishment Ordinance Update**, and I found the information shared to be enlightening. As a licensed California massage therapist, under CAMTC since 2009 (#14451), I need to understand how these impending ordinance changes might impact my private practice.

Prior to 2009, I registered with the City to get the required registration and training. I have worked from home for 20+ years [REDACTED] [REDACTED] Santa Rosa, CA 95403) and maintained a City of Santa Rosa Business Tax Certification.

As a 72-year-old, I embarked on my career in the massage business many years ago, driven by my passion for helping others. As you might know, being a massage therapist is not just a job, for me; it is a vocation that allows me to connect with people on a deeper level, promoting better health and well-being within the community. Furthermore, the classification of my practice as a “home occupation” has made it viable for me to continue working even into my retirement years.

Currently, I work part-time, seeing anywhere from zero to two clients a

day. This part-time schedule allows me to do what I love while maintaining a balance with other aspects of my life. However, I rely significantly on the income I generate from my massage therapy sessions. Given the cost of living in Santa Rosa, my Social Security benefit alone is insufficient to cover my basic living expenses. Without the supplemental income from my massage business, I face considerable financial hardship.

It is with this understanding of my current situation that I reach out for your support or consideration regarding policies affecting home-based businesses like mine. I believe in the importance of allowing massage therapist to engage in work, which not only aids in their financial stability but also enhances the quality of life in Sonoma County.

I would like to know how the zoning changes to “massage-related use” and the “live-work / work-live” property use changes will affect my ability to support myself.


I am hopeful that there can be a dialogue that allows for both the City’s goals of eliminating illicit establishments and the sustenance of legitimate therapist like myself.

Thank you for your time, and for considering the realities faced by those of us who cherish our professions and our ability to contribute to our community even after traditional retirement age. I welcome any dialogue on how we might better support individuals in positions like mine.

Best Regards,

Ron Lowe - CAMTC #14451





PS: I would like to request a copy of the new ordinance when a draft is available. Please let me know if there is an updated website with this ordinance change.



**From:** [DeBaca, Daniela](#)  
**To:** [Brown, Madeline](#)  
**Subject:** FW: [EXTERNAL] Fwd: Massage Ordinance Santa Rosa Ca 2025  
**Date:** Wednesday, February 26, 2025 4:32:10 PM  
**Attachments:** [image001.png](#)

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**From:** DeBaca, Daniela  
**Sent:** Wednesday, January 29, 2025 2:47 PM  
**To:** Stacey Richards [REDACTED]; Kirk, Lou <[lkirk@srcity.org](mailto:lkirk@srcity.org)>  
**Cc:** [tlsachsen@srcity.org](mailto:tlsachsen@srcity.org); Stapp, Mark <[MStapp@srcity.org](mailto:MStapp@srcity.org)>  
**Subject:** RE: [EXTERNAL] Fwd: Massage Ordinance Santa Rosa Ca 2025

Good afternoon Ms. Richards,

Thank you for your insight, it was very helpful bringing valuable information to light. We are currently reviewing the various laws/resources and consulting with our City Attorneys Office to ensure the ordinance is not in conflict. Your input and that of your colleagues has been critical to the development of this ordinance. We are accepting input through the month of February. If you or your colleagues have any further thoughts, ideas, insight, please do not hesitate to communicate with us. We have also developed a list of those requesting to receive a copy of the new ordinance draft which you have been added to. Once it is complete, we will be sure to send it out.

Thanks again. Hope you have an enjoyable evening.

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**From:** Stacey Richards [REDACTED]  
**Sent:** Saturday, January 25, 2025 11:51 AM  
**To:** Kirk, Lou <[kirk@srcity.org](mailto:kirk@srcity.org)>  
**Cc:** DeBaca, Daniela <[ddebaca@srcity.org](mailto:ddebaca@srcity.org)>; [tlsachsen@srcity.org](mailto:tlsachsen@srcity.org); Stapp, Mark <[MStapp@srcity.org](mailto:MStapp@srcity.org)>  
**Subject:** [EXTERNAL] Fwd: Massage Ordinance Santa Rosa Ca 2025

Dear City of Santa Rosa Planning, Lou Kirk, Daniela DeBaca, to whom this may concern,  
1/25/2025

My name is Stacey Richards Murray. I am a massage therapist, practicing for 30 years in the city of Santa Rosa.

I am writing to you today to urge the city of Santa Rosa to accept any verifiable source of education that meets the Massage Therapy Act standards as acceptable proof to practice massage in the city of Santa Rosa. No one agency should act as the sole agency for meeting massage therapist requirements when there are many.

I am a 1994 graduate of National Holistic Institute in Emeryville and a member of the American Massage Therapy Association (AMTA). As a member of AMTA I am required to have a 500-hour certificate from an accredited school and to report continuing education hours to remain in good standing. AMTA membership also gives myself and other therapists liability insurance along with other professional benefits. It is also a good resource for the public to find a therapist anywhere in the nation that holds the required education, is active in learning, and carries liability insurance.

It concerns me to allow one agency such as California Massage Therapy Council (CAMTC) to serve as the sole agency for meeting operating criteria in the new ordinance for practicing massage therapy in the city of Santa Rosa. There are already many different organizations, national and international, that therapists already belong to that demonstrate compliance with the state of California Massage Therapy Act and provide proof of education, legitimacy, and a robust depth of services and resources that exceed that of CAMTC.

Currently, CAMTC has proposed to the city that it turn its voluntary role in the state

into a mandate to practice in the city of Santa Rosa. CAMTC far reaching and legislation still needs working to be mandatory at this point in my opinion and that of the State at this time.

Why is this a bad idea?

1. Handing over control to one agency, specifically CAMTC, poses a long-term impact to the diversity of massage therapy in the healing arts field. National and international organizations already exist that may not be CAMTC-qualified, thus putting the CAMTC agency in an exclusive position.

2. The mandate would be redundant to current longer standing and effective national oversight. There are many long-standing organizations that could provide easy verification of a massage therapists legitimacy and education to support the Massage Therapy Act Law. Below you will find links to the law and some of those organizations.

National AMTA already provides oversight, resources, and training. It requires the same or higher criteria that members must maintain.

<https://www.amtamassage.org/>

Board Certification in Therapeutic Massage and Bodywork is another organization that meets and exceeds California and CAMTC requirements to practice massage. This organization is accepted in most of the states for practicing massage

<https://ncbtmb.org/board-certification/>

Abmp

<https://www.abmp.com/updates/legislative-updates/california>

FsMTB

<https://fsmtb.org/>

Massage Therapy Foundation

<https://massagetherapyfoundation.org/community-service/>

Massage Therapy Act (Current California Law)

[https://leginfo.legislature.ca.gov/faces/codes\\_displayText.xhtml?lawCode=BPC&division=2.&title=&part=&chapter=10.5.&article=](https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=BPC&division=2.&title=&part=&chapter=10.5.&article=)

3. The CAMTC mandate would be costly. It would burden new and existing therapists at \$300 every two years to get or keep their license in addition to already long standing membership. CAMTC costs create a burden on the therapists just starting out or providing massage as a supplemental income. High CAMTC dues may discourage massage therapists from pursuing continuing education courses beyond the minimum requirements and getting liability insurance, or force them to raise their rates to cover the costs of continuing

education, insurance, and dues. This could in turn increase cost to clients and affect the accessibility of massage therapy for those that use massage to manage pain, stress or other health symptoms.

Before the proposed changes and new increase in business tax in Santa Rosa, business tax was between \$50 and \$65; annual AMTA dues that include liability insurance is \$235. In general I spend between \$800 to \$2000 in continuing education a year. The new fees would be: The new flat \$200 for business tax, \$235 for AMTA liability insurance and \$300 from CAMTC. For a new therapist these fees could feel like a burden and could result in non compliance.

The CAMTC organization is and should remain voluntary. CAMTC should not be involved in policing Massage Therapy Ordinance at this time but be used as a source along with others to verify a therapists legitimacy under the existing state law of Massage Therapy Act. CAMTC's proposal is overreaching, especially as other organizations already exist to verify, track and legitimate massage therapists. Please keep the Massage Therapy Ordinance open to other means of proof of education to prove legitimacy beyond that of CAMTC. Please do not give sole authority to CAMTC to make its voluntary organization a mandate in the city of Santa Rosa. CAMTC is a great resource but not ready to be in sole control of Massage Therapy.

I would be happy to discuss this issue further with you to provide any help or clarification as you rewrite the city's Massage Therapy ordinance.

Sincerely,

Stacey Richards Murray Massage Therapy



**From:** [DeBaca, Daniela](#)  
**To:** [Brown, Madeline](#)  
**Subject:** FW: Follow up to massage meeting  
**Date:** Wednesday, February 26, 2025 4:31:20 PM  
**Attachments:** [image001.png](#)

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**DANIELA DEBACA | Senior Code Enforcement Officer**

Code Enforcement | Neighborhood Revitalization Program

Planning and Economic Development | 100 Santa Rosa Ave. Rm 3 | Santa Rosa, CA 95404

Tel. (707) 543-3463 | Fax (707) 543-3218 | [ddebaca@srcity.org](mailto:ddebaca@srcity.org)



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**From:** DeBaca, Daniela  
**Sent:** Thursday, January 30, 2025 9:13 AM  
**To:** Karen Rutkowski [REDACTED]  
**Cc:** Kirk, Lou <[lkirk@srcity.org](mailto:lkirk@srcity.org)>  
**Subject:** RE: Follow up to massage meeting

Good morning Ms. Rutkowski,

Thank you for your insight, it was very helpful bringing valuable information to light. We are currently drafting changes to accommodate uses such as yours and will be recommending the same to the City Council in March. Your input and that of your colleagues has been critical to the development of this ordinance. We are accepting input through the month of February. If you or your colleagues have any further thoughts, ideas, insight, please do not hesitate to communicate with us. We have also developed a list of those requesting to receive a copy of the new ordinance draft which you have been added to. Once it is complete, we will be sure to send it out.

Thanks again. Hope you have an enjoyable day.

**DANIELA DEBACA | Senior Code Enforcement Officer**

Code Enforcement | Neighborhood Revitalization Program

Planning and Economic Development | 100 Santa Rosa Ave. Rm 3 | Santa Rosa, CA 95404



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**From:** Karen Rutkowski [REDACTED]  
**Sent:** Friday, January 17, 2025 10:10 AM  
**To:** DeBaca, Daniela <[ddebaca@srcity.org](mailto:ddebaca@srcity.org)>  
**Cc:** Kirk, Lou <[lirk@srcity.org](mailto:lirk@srcity.org)>  
**Subject:** [EXTERNAL] Follow up to massage meeting

Good morning!

Thank you for contacting me regarding the meeting for code ordinance changes. I did attend the meeting. I would like to receive a copy of the proposed draft to review. I was quite confused on the intent of direction of the meeting from the City of Santa Rosa. What I took away from the meeting was that City of SR will be mandating that that ALL practicing Massage Therapists/Practitioners will need to be certified under the CAMTC regulations and have an Establishment Business Certificate in order to provide services. Thus having to go through the zoning clearance process to get approved. This step may provide "teeth " to law enforcement to prosecute illegal establishments working under the guise of a legitimate Massage operation.

I support the City of Santa Rosa efforts to try and control the Human trafficking plight. I am not quite convinced that what is being proposed is the right direction to take without impacting legitimate Massage Therapists/Practitioners.

In conjunction to being a Massage Practitioner (CAMTC member), I am also a Licensed Esthetician and Nail Technician. My regulatory committee is the CA Board of Barbering and Cosmetology; it requires that if I am to provide mobile services I must apply for a specialized permit (Mobile Unit permit) beyond that of my licenses and my Establishment License. If the city is looking to try and regulate mobile/out call Massage services, they may consider a sub category additional to the new proposed ordinance. The BBC also has a permit requirement for home based licensing. It is required that if a licensed person is providing services from their residence the work space must have the following: a separate entrance into the work space (customer may not enter through main residence to go to work space) AND there must be a separate restroom within the work space that is not used by primary residence.

I would like to be notified with any additional meetings about this subject in order to attend.

Respectfully,  
Karen Rutkowski  
KMR Skincare Massage Nails



**From:** [DeBaca, Daniela](#)  
**To:** [Brown, Madeline](#)  
**Subject:** FW: [EXTERNAL] Concerned Citizens Illicit Massage Business Update  
**Date:** Wednesday, February 26, 2025 4:33:43 PM  
**Attachments:** [human trafficking awareness - massage businesses.pdf](#)  
[NY Times IMB Article.pdf](#)  
[image001.png](#)

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**From:** Kurtis Bennett [REDACTED]  
**Sent:** Friday, January 31, 2025 10:08 AM  
**To:** Kurtis Bennett [REDACTED]  
**Cc:** \_CityCouncilListPublic <citycouncil@srcity.org>; Cregan, John <JCregan@srcity.org>; [REDACTED]; [REDACTED]; Osburn, Gabe <GOsburn@srcity.org>; DeBaca, Daniela <ddebaca@srcity.org>; Beverly May [REDACTED]; Ahmos Netanel [REDACTED]; Mark Dixon [REDACTED]; Rick McElroy [REDACTED]; Lisa Diaz-McQuaid [REDACTED]; Smalstig, Madison [REDACTED]  
**Subject:** [EXTERNAL] Concerned Citizens Illicit Massage Business Update

To all:

As usual, concerned community members are bcc'ed for privacy.

I'm writing to provide you with an update on the rewrite of



the City of Santa Rosa massage business ordinance and to share some information I learned while attending an anti-human trafficking seminar at Sonoma State University.

### **Ordinance Update**

As many of you recall, we started this journey nearly a year ago by meeting at the downtown library on 02/14/2024. The purpose of the meeting was to raise awareness about the number of massage businesses in Santa Rosa and our shared concern that some of these establishments may potentially be engaging in illicit activities, including human trafficking and/or commercial sex operations. During that meeting, we listened to subject matter experts from the [California Massage Therapy Council \(CAMTC\)](#) and [Verity](#) speak about the scope and impact of the issue. The meeting was well attended, with more than 50 concerned citizens and local officials present. From that meeting, the seeds were planted. Numerous City of Santa Rosa officials, including City Council members, the Police Chief, and the Code Enforcement team, began working on a new City of Santa Rosa ordinance that will serve to address the illicit massage business (IMB) problem while ensuring legitimate massage professionals and establishments that provide a valued therapeutic benefit to the public are not negatively impacted. This process was, by design, thorough and methodical.

Thankfully, the process is nearly complete, as the new ordinance is scheduled to go before the Planning Commission on 02/13/25 and then to the City Council for potential adoption on 03/04/2025. *Please put a placeholder on your calendar for the 03/04 meeting starting at 4 p.m. at City Hall.* It'll be an excellent opportunity for all involved to celebrate a win and to recognize and thank our City Council, Santa Rosa PD, Code Enforcement professionals, the CAMTC, and others for their hard work and dedication to this issue.

That said, adopting a new ordinance alone does not mean that the IMBs will spontaneously disappear. Addressing the issue will require time and resources from many, including concerned citizens, to keep the issue front and center by remaining actively engaged with the problem over the long haul.

### **Anti-Human Trafficking Seminar**

I waited to write and share some of what I learned until I could update you on the ordinance rewrite process to spare you too many emails.

This past November, I attended a two-day anti-human trafficking seminar at Sonoma State University taught by a

law enforcement professional. What I learned during that two-day course floored me. The scale of human trafficking for commercial sex operations in the United States is staggering, and its impact is felt in virtually every community across the country, including Sonoma County. Human trafficking for commercial sex operations is run by organized crime organizations, including the Chinese, Russian, and Mexican Mafia, as well as street gangs. Illicit massage businesses in the United States, including those in Santa Rosa, are run almost exclusively by Chinese criminal enterprises. These criminal organizations prey on vulnerable women and turn them into literal slaves to make money with no regard for the victims' wellbeing while depriving them of the most basic of human rights: personal agency.

Thankfully, the seminar was well attended by law enforcement, including members of the SOCO DA's office, who are committed to addressing this issue.

Before retiring to Santa Rosa, I worked as a firefighter in SoCal. After attending the seminar, I realized that I witnessed human trafficking numerous times throughout my career. Unfortunately, neither I nor the others I worked with, including police officers, recognized the signs of human trafficking because we never received any training

on the subject. Thankfully, there is now a requirement for police officers and EMS providers to receive limited training on the subject.

My firsthand experience motivates me to continue raising awareness about an important issue for my new hometown and me. While I'm not sure what our next steps are as concerned citizens, I'd like to think that raising awareness through public meetings, emailing elected officials, and being knowledgeable about a grave human rights issue in our community is a step in the right direction. Please take some time to explore/read the attached links/PDFs below to understand/refresh yourself on the significance of the problem. It's a very big deal, and it's happening in our community.

I will keep the updates coming and welcome ideas about our grassroots efforts to reduce human suffering in Sonoma County.

Kurtis Bennett  
Concerned Citizen

**Additional Information, Links/PDF's:**

- [Human Trafficking Institute](#)

- [American Psychological Association](#)
- [YouTube: Human Trafficking/Massage](#)

**From:** [DeBaca, Daniela](#)  
**To:** [Brown, Madeline](#)  
**Subject:** FW: [EXTERNAL] New code law for IMB  
**Date:** Wednesday, February 26, 2025 4:35:44 PM  
**Attachments:** [image001.png](#)

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**DANIELA DEBACA | Senior Code Enforcement Officer**

Code Enforcement | Neighborhood Revitalization Program

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**From:** DeBaca, Daniela  
**Sent:** Tuesday, February 4, 2025 4:12 PM  
**To:** JESSI SPIERINGS [REDACTED]  
**Cc:** Kirk, Lou <[lkirk@srcity.org](mailto:lkirk@srcity.org)>  
**Subject:** RE: [EXTERNAL] New code law for IMB

Good afternoon Ms. Spierings,

Thank you for your valuable insight; it has been extremely helpful. We are currently drafting changes to accommodate mobile massage uses, which we plan to recommend to the City Council in March. We share your concerns regarding illicit businesses and complacent property owners, and I'm pleased to inform you that the revised ordinance will address these issues. The new language will ensure recourse and responsibility from both property owners and business owners, while also prohibiting the use of neon signage.

Your input, as well as that of your colleagues, has been critical in shaping this ordinance. We are still accepting feedback through February, so if you or your colleagues have any additional thoughts or suggestions, please don't hesitate to share them with us.

We've also compiled a list of those who wish to receive a copy of the draft ordinance, and you've been added to that list. Once the draft is complete, we will make sure to send it your way.

Thanks again for your continued engagement. Wishing you an enjoyable evening!

**DANIELA DEBACA | Senior Code Enforcement Officer**

Code Enforcement | Neighborhood Revitalization Program

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**From:** JESSI SPIERINGS [REDACTED]  
**Sent:** Monday, February 3, 2025 3:36 PM  
**To:** Kirk, Lou <[kirk@srcity.org](mailto:kirk@srcity.org)>  
**Cc:** DeBaca, Daniela <[ddebaca@srcity.org](mailto:ddebaca@srcity.org)>  
**Subject:** [EXTERNAL] New code law for IMB

Hello Lou,

I am a massage therapist and have been practicing for the past 18+ years in Santa Rosa. I attended the meeting that was held at the Council Meeting room a few weeks back to discuss future changing to the city's codes with local CMTs. I had meant to reach out sooner...

I would like to receive a copy of the new code going into place. I realize you may already be in the final draft but wanted to add and follow up on some of the comments brought up at the meeting.

1. As discussed at the meeting, outcalls/mobile massage therapists are hard working folks by and large. Let's be clear, no sex worker would go through the trouble to carry a massage table to a client's house, if not needed. I am glad to hear that it will not be prohibited in future codes. I did outcalls in the beginning of my business and it is a lot of work. The scenarios mentioned at the meeting highlight how much of an important service this is for some folks.

2. Something was mentioned about the frustration of the IMBs renting in a building where the landlord is made aware that the business is not massage but an IMB. Their response is that they are paying rent, so they are fine as long as not being told to close down. You made a comment that they would "gently" be discouraged to stop renting to them. I am frustrated by the obvious problem here. The responsibility should be on the owners of building to not rent to these obvious IMBs. They make no effort to hide what they are doing with neon "OPEN" & "MASSAGE" signs, lit up all night. They block the windows and have cameras at entrance. Legitimate CMTs do not have signage like this. I have at least 3 on the couple blocks around my office on

College. Two are directly across from the SRMS campus. There are at least 3 out in the Larkfield area near schools, and in the suburbs where I live. I understand there is sex work, sex trafficking and prostitution in all parts of the city, but these are glaring examples of city laws being broken and it seems we cannot get out of our own way to get them closed down! As a practitioner who has made an effort to follow the codes, laws and pay my fees, I am discouraged that these folks can flout the law and continue to do business. Our legal business becomes tainted by the lack of boundary that has been allowed to happen.

3. Something else that was brought up at the meeting, that was not addressed, was the need to create a phone number to call if you are propositioned, or had an inappropriate advance from a client. I have had those experiences early in my career and it was awful. If we are truly worried about sex trafficking, CMTs safety, client's safety and setting up guidelines between genuine massage therapy from CMTs and sex work that would be a start. Create a safe place for all of us, by having a phone number to call to guide folks in these situations.

I do appreciate that the city is trying to address this unfortunate situation. The IMBs are everywhere in the city and unincorporated areas. They keep popping up and I don't see them getting shut down. I hope the rewriting of the zoning and city codes can minimize the proliferation of these businesses, especially the ones who sex traffic women. This is a stain on our great community.

Thank you for your hard work on this. I do appreciate this tremendously. This has gone on for far too long.

I know it is a touchy problem and I hope you can forgive my frustrated tone.

Jessi Spierings  
CMT#4838



**From:** [DeBaca, Daniela](#)  
**To:** [Brown, Madeline](#)  
**Subject:** FW: [EXTERNAL] IMB Draft  
**Date:** Wednesday, February 26, 2025 4:36:52 PM  
**Attachments:** [image001.png](#)

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**DANIELA DEBACA | Senior Code Enforcement Officer**

Code Enforcement | Neighborhood Revitalization Program

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**From:** Kurtis Bennett [REDACTED]  
**Sent:** Thursday, February 6, 2025 3:51 PM  
**To:** DeBaca, Daniela <ddebaca@srcity.org>  
**Cc:** Kirk, Lou <lirk@srcity.org>  
**Subject:** Re: [EXTERNAL] IMB Draft

Daniela,

Thank you for adding me to the list of folks slated to receive a draft copy. I'm grateful that *Mobile Massage* will be permitted. I understood that was a significant issue with CMTs.

And a huge thank you for your quick replies and hard work on this issue. Seeing the system work to create positive change is a treat.

Have a nice weekend,  
Kurtis

On Thu, Feb 6, 2025 at 3:25 PM DeBaca, Daniela <[ddebaca@srcity.org](mailto:ddebaca@srcity.org)> wrote:

Hi Kurtis

The exact release date is still being finalized as changes are ongoing. At the current pace, I'm hopeful it will be completed by the end of next week. We've compiled a list of requests, and I'll make sure to add you to that list. I truly appreciate your consideration of email requests and your assistance in facilitating the process. If there are any questions or concerns, please feel free to encourage individuals to contact us directly. I'm more than happy to provide any information that may help ease any anxieties.

Several people have expressed concerns about the restriction on out-call services. I'm pleased to inform you that our direction has shifted. As part of our proposal to the City Council, we plan to allow mobile massage services through the application/registration process, with an Administrative Adjustment approved by the Department Director. Additionally, we're proposing to change the term "out-call" to "mobile massage."

Thank you again for your support and understanding as we move forward. Please don't hesitate to reach out if you need anything further.

**DANIELA DEBACA | Senior Code Enforcement Officer**

Code Enforcement | Neighborhood Revitalization Program

Planning and Economic Development | 100 Santa Rosa Ave. Rm 3 | Santa Rosa, CA 95404

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**From:** Kurtis Bennett <[REDACTED]>

**Sent:** Thursday, February 6, 2025 11:04 AM

**To:** DeBaca, Daniela <[ddebaca@srcity.org](mailto:ddebaca@srcity.org)>

**Subject:** [EXTERNAL] IMB Draft

Daniela,

Good morning. I understand that CMTs can receive a copy of the new draft of the massage business ordinance at some point before the planning meeting on 02/27. Can you let me know when it's available for distribution?

I don't want to email the CMTs in the citizen's group until it's ready to spare you from receiving premature email requests. Have a nice day, and thank you for your continued work.

Kurtis Bennett

**From:** [DeBaca, Daniela](#)  
**To:** [Brown, Madeline](#)  
**Subject:** FW: [EXTERNAL] Re: Proposed SR massage ordinance  
**Date:** Wednesday, February 26, 2025 4:38:02 PM  
**Attachments:** [image001.png](#)

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**DANIELA DEBACA | Senior Code Enforcement Officer**

Code Enforcement | Neighborhood Revitalization Program

Planning and Economic Development | 100 Santa Rosa Ave. Rm 3 | Santa Rosa, CA 95404

Tel. (707) 543-3463 | Fax (707) 543-3218 | [ddebaca@srcity.org](mailto:ddebaca@srcity.org)



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**From:** fred@ecostewards.org [REDACTED]  
**Sent:** Thursday, February 20, 2025 9:17 PM  
**To:** DeBaca, Daniela <ddebaca@srcity.org>; Alvarez, Eddie <EAlvarez@srcity.org>; Rogers, Natalie <NRogers@srcity.org>  
**Subject:** [EXTERNAL] Re: Proposed SR massage ordinance

Hello Daniela DeBaca,

Santa Rosa Code Enforcement Officer,

I think that this is a terrible proposal. It will cause much more administrative work for therapeutic massage businesses, and cause rates for massage services to rise substantially.

The biggest citizen group that will be affected are probably senior citizens who often need massage services for blood pressure issues, stiffness, tension and sore joint reasons. Some of these people need regular massage so that they can continue to walk. They are often squeezing in massages on small social security incomes that barely cover their survival

expenses. If you visit a massage business, you may learn that most of the clients are the elderly and senior citizens.

Your proposal will make massage more difficult to access for those who have medical needs yet have tiny budgets. You will also make massages more expensive.

You should realize that some of the city's best massage therapists are Chinese citizens who do not have California certificates because they were trained in China. For instance, Michael's Reflexology (Across from the downtown post office) uses primarily Chinese therapists who are highly skilled yet without US citizenship or California certificates. This facility is perhaps the least expensive massage business in Santa Rosa, yet this proposed ordinance will create a lot of extra bureaucracy and administrative difficulty for these businesses.

From this perspective, you are not providing any benefit to the City of Santa Rosa or its citizens.

Besides your effort will likely cause some businesses to leave Santa Rosa and go to Rohnert Park, Sebastopol or other nearby towns. The result will be an exodus to nearby communities where they do not require such onerous requirements.

What residents need much more than this massage ordinance is the removal of gang graffiti on city property, the removal of private property graffiti that lingers for weeks and sometimes months in neighborhoods, including parks; ending commercial work on private property, removing cars parked on front lawns and yards, extracting crowds of homeless flopping in city parks and ruining the ability of young people and students to use those parks, and cleaning up piles of garbage in our parks. Presently you do not do an adequate job on these easier tasks. These are issues which you should be enforcing before you expand the scope of code enforcement into new areas at a time when you are still doing a poor job at providing enforcement of the regulations which are already on the

books.

I am sorry to point out to you all of your present inadequacies, but these are true failures of code enforcement in Santa Rosa's neighborhoods. If you cannot adequately fulfill the present task before you, why should we trust you to add on more jobs and in the process make life difficult for a large sector of city residents?

My best to you,

Fred



cc: Eddie Alvarez

**From:** [DeBaca, Daniela](#)  
**To:** [Brown, Madeline](#)  
**Subject:** FW: [EXTERNAL] Message  
**Date:** Wednesday, February 26, 2025 4:38:39 PM  
**Attachments:** [image001.png](#)

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**From:** DeBaca, Daniela  
**Sent:** Tuesday, February 25, 2025 4:35 PM  
**To:** Twyla Lytle [REDACTED]  
**Cc:** Kirk, Lou <[lkirk@srcity.org](mailto:lkirk@srcity.org)>  
**Subject:** RE: [EXTERNAL] Message

Good afternoon Ms. Lytle

Thank you for reaching out with your concerns. We are currently revising the Massage Ordinance to provide the necessary enforcement tools. The existing ordinance is outdated and refers to laws that are either obsolete or have been relocated, limiting our effectiveness. The revised ordinance will be presented to the Planning Commission on 2/27/25 and then to the City Council for approval on 3/4/25. If approved, it will become law on 4/4/25.

Massage-related businesses will have 120 days to comply with the new requirements, which include registration and certification with the City, along with documentation and background checks (in addition to a Business Tax Certificate). The revised ordinance will introduce new fees, penalties, fines, and legal remedies, holding technicians, business owners, and property owners accountable for business activity. Additionally, it will address items visible from the public right of way, such as limited hours of operation and the prohibition of neon signage. For those interested in learning more or following the progress, presentations to the Planning Commission and City Council can be viewed at the links below:

- [Planning Commission](#)

- [City Council](#)

We share your frustrations and are committed to resolving these issues. If you have any questions, please don't hesitate to reach out – I'm happy to help.

**DANIELA DEBACA | Senior Code Enforcement Officer**

Code Enforcement | Neighborhood Revitalization Program

Planning and Economic Development | 100 Santa Rosa Ave. Rm 3 | Santa Rosa, CA 95404

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-----Original Message-----

From: Twyla Lytle [REDACTED]

Sent: Thursday, February 20, 2025 5:18 PM

To: DeBaca, Daniela <[ddebaca@srcity.org](mailto:ddebaca@srcity.org)>

Subject: [EXTERNAL] Message

Good evening as you know down fourth Street downtown Santa Rosa and all the way to Safeway there is nothing but illicit massage parlors. They're all the way down college. I'm just absolutely floored and disgusted with Santa Rosa businesses getting licenses for this stuff. I am a business owner I pay tremendous tax in this town. I pay business licenses. I'm a salon downtown and I'm just appalled at how many of these happy ending establishments you guys have allowed !! This is a problem and it's getting worse. Please pay attention to whom your giving business licenses too!!!  
Sent from my iPhone



**From:** [Jones, Jessica](#)  
**To:** [Kirk, Lou](#); [Weeks, Karen](#); [\\_PLANCOM - Planning Commission](#)  
**Cc:** [Osburn, Gabe](#); [Crocker, Ashle](#)  
**Subject:** RE: Message  
**Date:** Tuesday, February 25, 2025 4:52:39 PM  
**Attachments:** [image003.png](#)

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\* FOR INFORMATION ONLY, PLEASE DO NOT REPLY TO ALL \*

Good afternoon Chair Weeks and Planning Commissioners,

I wanted to clarify the comment that Lou provided below in response to the question about fees. The resolution and associated Exhibit A that Lou mentioned are part of the Council packet for their 3/4/2025 meeting, and were not intended to be part of the Planning Commission packet. As you are aware, fees are not within the purview of the Commission. However, similar to the high-level fee information provided verbally to the Commission during the recent review of the Landmark Alteration Permit process, staff will be prepared to give an overview of the fees that will be presented to the Council on 3/4.

Thank you,  
Jess

**Jessica Jones | Deputy Director - Planning**

Planning and Economic Development Department | 100 Santa Rosa Avenue, Room 3 | Santa Rosa, CA 95404

Tel. (707) 543-3253 | Mobile (707) 292-0963 | [jjones@srcity.org](mailto:jjones@srcity.org)



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**From:** Kirk, Lou <[kirk@srcity.org](mailto:kirk@srcity.org)>  
**Sent:** Monday, February 24, 2025 7:27 AM  
**To:** Weeks, Karen <[KWeeks@srcity.org](mailto:KWeeks@srcity.org)>; [\\_PLANCOM - Planning Commission](#) <[planningcommission@srcity.org](mailto:planningcommission@srcity.org)>  
**Cc:** Jones, Jessica <[jjones@srcity.org](mailto:jjones@srcity.org)>; Osburn, Gabe <[GOsburn@srcity.org](mailto:GOsburn@srcity.org)>; Crocker, Ashle <[acrocker@srcity.org](mailto:acrocker@srcity.org)>  
**Subject:** RE: Message

Good morning Chair Weeks,

Thank you for your email. I appreciate the time you took to review this. Please see my responses **below**:

1. What are the fees? I didn't find them listed anywhere.

**There is a Resolution and Attachment A that should have been included. I will verify today that this supporting documentation has been provided.**

2. Is there enough staff to do the CUP's in a timely manner? Will they be phased in?

**The Massage program itself does not require CUP's. Pursuant to existing code provisions, CUP's may be required as prerequisite actions relative to Home Occupations and "Live/work" or "Work/ Live" uses. It is not anticipated that a large number of CUP's will be processed as a result of the new massage ordinance.**

3. Same question for the Administrative Adjustment

**There is adequate staffing to process Administrative Adjustments. As with the CUP's, it is not anticipated that a large number of Administrative Adjustments will be processed as a result of the new massage ordinance.**

4. Should there be a definition of administrative adjustment in the definition section?

**Not necessarily. The term is meant to be self-explanatory and is internally consistent with similar staff actions in Title 20 (such as Minor Adjustments) which are not separately defined.**

5. Can the massage fees and business license fees be done at the same time?

**No. The Business License Tax is administered by another Department within the City and is prerequisite to a Massage Establishment Certification.**

6. How will the massage fees be handled? Same as business license fees?

**Massage Establishment Certification fees will be collected at the time of application and/or renewal in a manner similar to other Planning and Economic Development fees.**

7. Section 20-49.040 A5 - what if a therapist works less than days per month?

**If a Certified Massage Therapist works (10) or less days per month, they are not required to be listed as an employee of the Massage Establishment for purposes of updating the City.**

8. Section 20-49.050 A2 - what if there is not enough room (thinking of where I go at ME Spa)

**This is a foundational program requirement and must be observed. Staff, however, will have case-by-case discretion and – in circumstances such as the one you describe – will work cooperatively with the establishment owner to find a solution (one idea here would be to have the placards in a binder that is prominently displayed in the reception and waiting area).**

9. Section 20-49.050 B2 and B3 - seem to contradict

**There is no contradiction. Massages must stop by 10:00 PM, and the patrons must exit the establishment by 10:30 PM. This provides time for the patrons to get dressed and make payment.**

10. Section 20-49.050 B4 - define visitor vs "helper" if someone is disabled (further on in the document) page 17 section iii

**The section accounts for this through the phrase, “except as otherwise provided herein.” This being said, I will look to the Planning Commission and the City Council for direction.**

11. Section 20-49.050B5 - what about clerical staff who check you out? Should that be added?

**No. This section only pertains to those minimal personnel allowed to be onsite between 11:00 PM and 6:00 AM.**

12. Section 20-49.050 H1 - I've been to Spas where they serve a complimentary glass of champagne - seems like this would be prohibited.

**This currently is prohibited under existing laws, unless the California Department of Alcoholic Beverage Control (ABC) provides either a license or an exemption. Additional City approvals may also be required, depending on the level of the alcohol related use.**

13. Section 20-49.090 -I think there should be 2 separate sections - 1 for Exemptions and 1 for Administrative Adjustments. It's confusing having them combined.

**Thank you. The section was envisioned to contain all of the relief provisions for the ordinance in a single location. While I am not contemplating any changes to this Section currently, I will certainly keep this suggested change in mind pending direction from the Planning Commission and the City Council.**

14. Section 20-49.090 A6 - why are they exempt - I feel they shouldn't be

**This is a common allowance seen in other ordinances within the State and was also introduced as a matter of concern during our outreach with the massage establishment community. I am not contemplating any changes to this Section currently but – similar to my response above – will certainly keep potential changes**

**in mind pending direction from the Planning Commission and the City Council.**

15. Section 20-49.090 B - clarify what is meant here – confusing

**This Section allows businesses – for which massage is only a minor or incidental component – to request Administrative Adjustment in order to obtain relief from some of the ordinance’s provisions. I am happy to respond in further detail if needed.**

I hope this brief response is helpful to you.

Thank you again,

~Lou

**Lou Kirk (he/him/his) | Assistant Chief Building Official**

Planning & Economic Development | 100 Santa Rosa Avenue, Room 3 | Santa Rosa, CA 95404

Hours: Monday - Thursday, 6:30 AM - 5:30 PM

Tel. (707) 543-3248 | [Lkirk@srcity.org](mailto:Lkirk@srcity.org)

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**From:** Weeks, Karen <[KWeeks@srcity.org](mailto:KWeeks@srcity.org)>

**Sent:** Friday, February 21, 2025 4:21 PM

**To:** Kirk, Lou <[lirk@srcity.org](mailto:lirk@srcity.org)>

**Cc:** Jones, Jessica <[jjones@srcity.org](mailto:jjones@srcity.org)>; Osburn, Gabe <[GOsburn@srcity.org](mailto:GOsburn@srcity.org)>; Crocker, Ashle <[acrocker@srcity.org](mailto:acrocker@srcity.org)>

**Subject:** Massage

Afternoon

I reviewed the packet and here are my comments/questions:

1. What are the fees? I didn't find them listed anywhere.
2. Is there enough staff to do the CUP's in a timely manner? Will they be phased in?

3. Same question for the Administrative Adjustment
  4. Should there be a definition of administrative adjustment in the definition section?
  5. Can the massage fees and business license fees be done at the same time?
  6. How will the massage fees be handled? Same as business license fees?
  7. Section 20-49.040 A5 - what if a therapist works less than days per month?
  8. Section 20-49.050 A2 - what if there is not enough room (thinking of where I go at ME Spa)
  9. Section 20-49.050 B2 and B3 - seem to contradict
  10. Section 20-49.050 B4 - define visitor vs "helper" if someone is disabled (further on in the document) page 17 section iii
  11. Section 20-49.050B5 - what about clerical staff who check you out? Should that be added?
  12. Section 20-49.050 H1 - I've been to Spas where they serve a complimentary glass of champagne - seems like this would be prohibited.
  13. Section 20-49.090 -I think there should be 2 separate sections - 1 for Exemptions and 1 for Administrative Adjustments. It's confusing having them combined.
  14. Section 20-49.090 A6 - why are they exempt - I feel they shouldn't be
  15. Section 20-49.090 B - clarify what is meant here - confusing
- Let me know if you have questions on my comments/questions

Karen

**From:** [Michael Cook](#)  
**To:** [Kirk, Lou](#)  
**Cc:** [PLANCOM - Planning Commission](#)  
**Subject:** [EXTERNAL] PUBLIC HEARING - MASSAGE ORDINANCE MUNICIPAL CODE AMENDMENTS  
**Date:** Sunday, February 23, 2025 6:46:07 PM

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Good evening,

As a neighbor of one of these massage parlors, I fully support the adoption of this ordinance and implementation. Thank you to the City for working through this process quickly and efficiently. My neighbor parlor is regularly open past its 9:00 pm closing time. The only thing I do not like about this ordinance is that the ordinance allows these massage parlors to be open until 10:00 pm. I do not think that this should be allowed and would propose an 8:00 pm closing time. What massage parlor needs to stay open past 8:00 pm??? One that is encouraging things that are not legal.

Please make this change to an earlier closing time, I would very much appreciate it!

Michael A. Cook

**From:** [DeBaca, Daniela](#)  
**To:** [Brown, Madeline](#)  
**Subject:** FW: [EXTERNAL] Regarding Massage and Adult Entertainment Resolutions  
**Date:** Thursday, February 27, 2025 9:15:38 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)

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**DANIELA DEBACA | Senior Code Enforcement Officer**

Code Enforcement | Neighborhood Revitalization Program

Planning and Economic Development | 100 Santa Rosa Ave. Rm 3 | Santa Rosa, CA 95404

Tel. (707) 543-3463 | Fax (707) 543-3218 | [ddebaca@srcity.org](mailto:ddebaca@srcity.org)



**\*\*\*Please be advised my work hours are Tuesday-Friday, 8am-5pm\*\*\***

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**From:** DeBaca, Daniela  
**Sent:** Thursday, February 27, 2025 9:15 AM  
**To:** 'Bloomer, David' [REDACTED]  
**Cc:** Kirk, Lou <[lirk@srcity.org](mailto:lirk@srcity.org)>  
**Subject:** RE: [EXTERNAL] Regarding Massage and Adult Entertainment Resolutions

Hello Mr. Bloomer

Thank you for raising this issue. We agree that legitimate massage therapy and illicit businesses labeled as adult entertainment are distinctly different and worlds apart. This is one of the key reasons it is addressed within the work process of this ordinance. The goal was twofold: first, to address the lack of clarity in the existing code regarding permit requirements, and second, to ensure the new massage ordinance clearly distinguishes between the two types of businesses. By handling both matters simultaneously, we can streamline the process.

Regarding the new massage ordinance, our aim is to further separate and clarify the existing classification of "adult entertainment business" from legitimate massage establishments, reinforcing that they are unrelated. This will help codify that distinction. For the record, these changes do not legalize prostitution. During the revision of the Massage Ordinance, part of the due diligence involved identifying areas in the code that overlap, reference, or relate to each other, including definitions. These "loose ends" are being addressed as part of the process.

For further clarification, please see page 7 of the Staff Report, which states: **"While this is not directly related to the Massage Ordinance, through the review of the Zoning Code, staff**

**identified an error** in Zoning Code Sections 20-23.030 and 20-24.030 related to permitting requirements in the Commercial and Industrial Zoning Districts.”

I hope this explanation helps clarify the concerns. Please don't hesitate to reach out if you have any further questions.

## 2. **Adult Entertainment Businesses**

In addition to the proposed changes related to massage businesses, staff is also recommending a change to Land Use Tables 2-6 and 2-10 to clarify the permitting requirements for “adult entertainment business” uses. While this is not directly related to the Massage Ordinance, through the review of the Zoning Code, staff identified an error in Zoning Code Sections 20-23.030 and 20-24.030 related to permitting requirements in the Commercial and Industrial Zoning Districts. Specifically, Tables 2-6 and 2-10 do not identify what, if any, permits are required for adult entertainment businesses.

The commercial and industrial land use tables simply include an “S,” which stands for “see specific use regulations for permit requirements,” and refers the reader to Chapter 20-40, Adult Entertainment Businesses. However, while the specific regulations located in Chapter 20-40 include applicability and location requirements, it refers back to the Allowed Land Uses and Permit Requirements tables in Division 2 for permitting requirements. As such, there is no Code provision that currently specifies what, if any, permits are required for adult entertainment businesses.

Staff recommends adding the requirement for a Conditional Use Permit (CUP) for adult entertainment businesses in the City's commercial and industrial zoning districts. Given that the purpose of Chapter 20-40 is “to prevent community wide adverse economic impacts, increased crime, decreased property values, and the deterioration of neighborhoods which can be brought about by the concentration of sexually-oriented businesses in close proximity to each other or proximity to other incompatible uses such as schools for minors, churches, parks and residentially zoned districts or uses,” requiring a CUP, which would be acted on by the Planning Commission, is appropriate to allow the review and analysis necessary to ensure compatibility with surrounding uses.

### **DANIELA DEBACA | Senior Code Enforcement Officer**

Code Enforcement | Neighborhood Revitalization Program

Planning and Economic Development | 100 Santa Rosa Ave. Rm 3 | Santa Rosa, CA 95404

Tel. (707) 543-3463 | Fax (707) 543-3218 | [ddebaca@srcity.org](mailto:ddebaca@srcity.org)



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**From:** Bloomer, David <[REDACTED]>  
**Sent:** Monday, February 24, 2025 11:03 AM  
**To:** DeBaca, Daniela <[ddebaca@srcity.org](mailto:ddebaca@srcity.org)>  
**Subject:** [EXTERNAL] Regarding Massage and Adult Entertainment Resolutions

Hello Daniella,

I see that the Planning Commission meeting to go over the resolution for massage therapy is scheduled for this Thursday.

I am curious about the inclusion of "Adult Entertainment" as a resolution in the same meeting.

Unless the specifically illicit businesses are being labeled as adult entertainment, I am not clear why that particular zoning is in conjunction with the resolution for massage therapy.

I see the two resolutions and have copied them. Are there any other documents that you could send me to help bring some clarity?

Legitimate massage therapy and illicit businesses pretending to be massage businesses are worlds apart. I remember in Petaluma a dozen years ago, the two were clouded together before the final draft was completed and I am wondering if something similar is occurring in Santa Rosa.

We fully support the city's determination to clean up the proliferation of illicit businesses of prostitution. We also stand firmly behind legitimate massage therapists in being able to build and maintain healthy practices within our city.

I would appreciate your help in understanding the proposed actions of the city.

Thank you,

*David Bloomer*  
National Holistic Institute  
Santa Rosa Campus Manager  
(707) 639-4066 ext 3600

**From:** [Beverly May](#)  
**To:** [PLANCOM - Planning Commission](#)  
**Subject:** [EXTERNAL] Comments for PUBLIC HEARING - Item 11.1 MESSAGE ORDINANCE MUNICIPAL CODE AMENDMENTS AND ADULT ENTERTAINMENT BUSINESS ZONING CODE AMENDMENT  
**Date:** Wednesday, February 26, 2025 4:32:52 PM  
**Attachments:** [Comments for Planning meeting 2.27.2025.docx](#)

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Please include the attached comments for the planning hearing Feb 27, 2027

Beverly May  
California Massage Therapy Council  
Director of Governmental Affairs, Human Trafficking and IT  
One Capitol Mall Suite 800  
Sacramento, CA 95814  
(650) 281-6290  
[bmay@camtc.org](mailto:bmay@camtc.org)

**Comments for PUBLIC HEARING – Item 11.1 MESSAGE ORDINANCE MUNICIPAL CODE AMENDMENTS AND ADULT ENTERTAINMENT BUSINESS ZONING CODE AMENDMENT**

**The Resolution # 1 25-100PC dated 2/21/2025**

**Comments:**

1. Page 2, first “Whereas” refers to “Massage Practitioners and Massage Establishments that have received their certification from or through a certifying body deemed equivalent or superior to CAMTC in terms of demonstrating proficiency in the practice of massage; and”
  - a. Problem – CAMTC does not certify massage establishments, nor does any other body.
  - b. Problem-. Business and Professions Code Section 4611 (a) It is an unfair business practice for a person to do any of the following:
    - (1) To hold himself or herself out or to use the title of “certified massage therapist” or “certified massage practitioner,” or any other term, such as “licensed,” “certified,” “CMT,” or “CMP,” in any manner whatsoever that implies or suggests that the person is certified as a massage therapist or massage practitioner, unless that person currently holds an active and valid certificate issued by the council pursuant to this chapter.

**The Resolution 2- 25-100PC dated 2/21/2025**

**Comments:**

This document is not clear as to whether the city still considers massage to be Adult Entertainment, including whether it is simply “revising Adult Entertainment Businesses” under Recreation, Education & Public Assembly Uses. CA Government Code Section 51034 (c) states “Nothing contained in this chapter shall authorize a city, county, or city and county to do any of the following:

- (2) Define a massage establishment as an adult entertainment business, or otherwise regulate a massage establishment as adult entertainment.”

However, reading the draft ordinance in its entirety, it does appear that proposed revisions to the massage ordinance include reasonable amendments to the zoning code that do not classify massage as Adult Entertainment.

**Draft Ordinance amending Repealing Title 6, chapter 6-32 and adding new Chapter 20-49 and amending section 20-23.030 and 20-24.030, 20-50.020(A), 20-52.060 and 20-62.030(B)(2) and amending section 20-70-.02**

**Comments:**

1. The last “whereas” on page 1 refers to another certifying body. And the definition of “Certified Massage Therapist” or “Therapist” reinforces that the city will recognize another

certifying body. However, *Business and Professions Code Section 4611 (a)* It is an unfair business practice for a person to do any of the following:

*To hold himself or herself out or to use the title of “certified massage therapist” or “certified massage practitioner,” or any other term, such as “licensed,” “certified,” “CMT,” or “CMP,” in any manner whatsoever that implies or suggests that the person is certified as a massage therapist or massage practitioner, **unless that person currently holds an active and valid certificate issued by the council pursuant to this chapter.**”*

## 2. 20-49.020 Definitions.

“Certified Massage Therapist” or “Therapist” means any Individual certified by CAMTC as a Certified Massage Therapist pursuant to California Business and Professions Code Section 4600 et seq, **or by another Certifying Body deemed equivalent or superior to CAMTC in terms of demonstrating proficiency in the practice of massage**, who, for compensation, performs or engages in any act of Massage as defined in this section. Pertaining to this chapter, the terms "masseur," "masseuse," "certified massage practitioner," or "Independent Therapist or Practitioner" shall have the same meaning as "Certified Massage Therapist" or “Therapist” when certified from or through a Certifying Body. **“Certified Massage Therapist Certificate” means the certificate issued by a Certifying Body**, required by this chapter, authorizing a Certified Massage Therapist to practice Massage Therapy in conjunction with a **certified Massage Establishment.”**

What is the purpose of this? No other massage certification entity is recognized in state law. The National Certification Board for Therapeutic Massage and Bodywork (NCBTMB ) requires use of "Board Certified, NCBTMB". Some specialties such as Rolfers have a private certification, but they also fall under most definitions of massage and will qualify for CAMTC certification.

Therefore, I believe the city needs to revise the definition of "Certified Massage Therapist" and delete the definition of "Certifying Body".

Although the city has definitions and guidelines for "Certified Massage Establishment" and "Certified Massage Establishment Certificate" it is not clear what is issued if each owner is not a "Certified Massage Therapist".

"independent Therapist" appears to leave a major loophole- if you look at ads for Illicit Massage Businesses (IMBs) they often advertise "new girls every 2 weeks". Why not just define an independent contractor- many cities include the definition within "employee".

“Certifying Body” is addressed above and this definition should be deleted to comply with statute-

“Certifying Body” means an organization, entity or authority that establishes standards, which can include, but are not limited to educational requirements, examinations, experience, and background checks, in order to evaluate and recognize competency in the field of massage, and through which certification satisfactorily demonstrates qualifications and commitment to professional standards. Examples of certifying bodies include but are not limited to state boards and national organizations.

Section 20-49-040A 5. - Most cities want to know within 3-5 days any new staff and those who have left.

Section 20-49.040 C allows 10 days after the fact to receive notice of amendment. Is this what the city prefers?

20-49.090 C3 is one of the sections that is likely to leave the massage therapist confused.

20-49.120A.1. Is there a reason the city wishes to tolerate three violations in two years?

1i. Again refers to an unnamed Certifying Body,

Section 20-49.120 A (1)(a-g)- Does the city want to allow 3 or more violations within this section within 2 years before proposing revocation of the Massage Establishment Certificate? This seems generous. If so, what if the owner/operator changes with that period, perhaps with a straw owner? Some of these Procedural Violations are also included in CA. Business and Professions Code section 4609, which are considered "Gross Violations" in Section 20-49.120 A (2)

Respectfully Submitted,

Beverly May

California Massage Therapy Council

Director of Governmental Affairs, Human Trafficking and IT

One Capitol Mall Suite 800

Sacramento, CA 95814

(650) 281-6290

bmay@camtc.org

**From:** [Brown, Madeline](#)  
**To:** [Brown, Madeline](#)  
**Subject:** FW: [EXTERNAL] new massage ordinance  
**Date:** Thursday, February 27, 2025 9:24:27 AM  
**Attachments:** [image001.png](#)

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**From:** Kirk, Lou  
**Sent:** Thursday, February 27, 2025 9:21 AM  
**To:** [REDACTED]  
**Cc:** DeBaca, Daniela <[ddebaca@srcity.org](mailto:ddebaca@srcity.org)>  
**Subject:** RE: [EXTERNAL] new massage ordinance

Good morning Gina,

Thank you for your email.

I want to assure you that the City's commitment to supporting local businesses remains steadfast. I believe we share a common goal in ensuring the effective implementation of this ordinance, and I want to offer the following clarifications to address your specific concerns:

- **Therapist Attire:** The regulations regarding therapist attire are directly derived from existing State Law and are therefore incorporated into the ordinance to maintain consistency and compliance.
- **"Adult Entertainment Businesses" Classification:** The inclusion of "Adult Entertainment Businesses" within the ordinance is not intended to conflate those establishments with legitimate massage therapy practices. Quite the opposite; the proposed changes to permitting requirements aim to further distinguish and separate these distinct business categories and reinforce that they are completely unrelated.
- **Legal Compliance:** The ordinance has undergone thorough review by our City Attorneys. I am particularly interested in understanding your specific concerns regarding potential non-compliance with the Massage Therapy Act. Your detailed feedback on this matter would be invaluable.

I would welcome the opportunity to discuss this ordinance with you in greater detail at your convenience. Furthermore, please note that the ordinance will be presented to the City Council for first reading on March 4th and for second reading on March 18th, providing you with additional opportunities for public input.

Thank you for your engagement in this important matter.

Sincerely,

~Lou

**Lou Kirk (he/him/his) | Assistant Chief Building Official**

Planning & Economic Development | 100 Santa Rosa Avenue, Room 3 | Santa Rosa, CA 95404

Hours: Monday - Thursday, 6:30 AM - 5:30 PM

Tel. (707) 543-3248 | [Lkirk@srcity.org](mailto:Lkirk@srcity.org)

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**From:** Gina Perine, CMT, CMLDT [REDACTED]  
**Sent:** Wednesday, February 26, 2025 5:28 PM  
**To:** DeBaca, Daniela <[ddebaca@srcity.org](mailto:ddebaca@srcity.org)>  
**Subject:** [EXTERNAL] new massage ordinance

Hello,

I am out of town this week and can not attend the meeting this Thursday, tomorrow.

However, the proposed ordinance as written is unclear and a huge step backward. We were assured that during the review, the approach would be business friendly to massage and respectful. This is far from it.

I am dismayed that after 20+ years of practice, continuing education, compliance and serving clients, the City of Santa Rosa is proposing a regulation for massage that truly is about regulating prostitution. Really? Explaining to me what I can and can not wear? It would appear that whomever is on this project can not let go of the past.

Prior to moving to Santa Rosa, I worked in two cities that underwent this process. This is the worst example I have seen.

And some of this proposed regulation is non-compliant with the Massage Therapy Act. Have the City attorneys reviewed for compliance?

This is disheartening to say the very least. I would hope that the planning departments and city council can see the wrong in this and ask staff to do a better job.

I truly realize that Santa Rosa has a problem with human trafficking and prostitution. I have lived and worked here for only 3 years but it was immediately apparent to me. And that desperately needs to be dealt with. However, demeaning massage therapy to prostitution and "adult entertainment" is not the right move.

Sincerely--

Gina Perine

*Gina Perine, CMT, CMLDT*  
ginaperine.com

