City of Santa Rosa
PLANNING & ECONOMIC DEVELOPMENT

www.srcity.org

APPEAL APPLICATION

RECEIVED
JAN 13 2023
CITY OF SANTA ROSA
CITY MANAGERS OFFICE

in person
eal.

GENERAL

LOCATION OF PROJECT (ADDRESS) 6241 Bridgewood Drive, Santa Rosa	**Note: This form is for appeals of Department actions only. Appeals of Commission and Board actions are filed in the City Manager's Office.**		
NAME OF PROJECT Short-Term Rental Application			
APPELLANT NAME Carrie Richey	DAYTIME PHONE (213) 361 - 1889		HOME PHONE ( ) -
APPELLANT ADDRESS 137 Milton Street,	CITY SF	STATE CA	ZIP 94112

APPEAL

To the Chairman and Members of the Planning Commission / Design Review Board/Cultural Heritage Board:

The undersigned: Carrie Richey does hereby appeal to the Planning Commission / Design Review Board/Cultural Heritage Board the decision of the Department of Planning and Economic Development made on 1/3/2023 *(Date)*

which denied *(approved, denied, other)* the application of Carrie Richey *(Name of property owner or developer)*

for a Short-Term Rental Permit *(State nature of request made to the Planning and Economic Development Department)*

on property situated at 6241 Bridgewood Drive, Santa Rosa CA 95409. *(Street address of subject property)*

A. The grounds upon which this appeal is filed are: (list all grounds relied upon in making this appeal. Please attach additional sheets if more space is needed.)

1. Please see the attached.

2.

B. The specific action which the undersigned wants the City Planning Commission/Design Review Board/Cultural Heritage Board to take is:

Find that my Operation in Good Standing status was recognized by the City and has not been revoked; thus, the 1,000 foot rule does not apply to my application, the 1,000 foot rule is arbitrary, the City has Violated my due process rights.

Carrie Richey
Appellant's signature

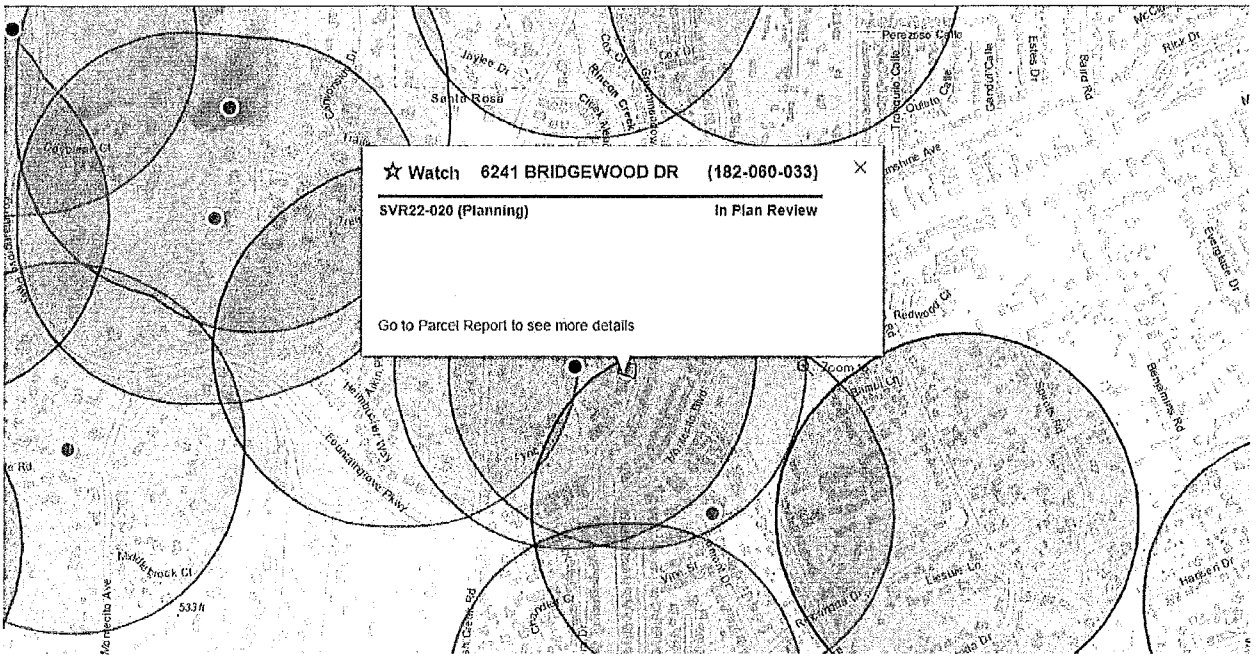
1-13-2023
Date

RE: [EXTERNAL] Re: SVR22-020 Notice of Denial

Bisla, Sachnoor <sbisla@srcity.org>
Wed 1/4/2023 8:25 AM
To: Carrie Richey <carrierichey@hotmail.com>
Cc: amandaneue@att.net <amandaneue@att.net>

Dear Ms. Richey,

As noted in my previous e-mail, dated January 3, 2023, during Planning review, it was determined that your proposed Non-Hosted Short-Term Rental at 6241 Bridgewood Drive is located within 1,000 feet of another Non-Hosted Short-Term Rental located at 2220 Fremont Drive (see below) for which a Short-Term Rental Permit has been issued (SVR22-014). Pursuant to the Short-Term Rental Urgency Ordinance Section 20-48.040(B)(3), "After December 3, 2021, no non-hosted short-term rentals may be proposed within 1,000 feet from the property line of another existing or proposed non-hosted short-term rental." The Director has made the decision to deny the Short-Term Rental Permit application SVR22-020 because your proposed Non-Hosted Short-Term Rental Permit application does not comply with Section 20-48.040(B)(3). Specifically, the application for SVR22-020 was submitted on April 26, 2022 and is proposed less than 1,000 feet from an existing Non-Hosted Short-Term Rental (at 2220 Fremont Drive, submitted on February 17, 2022).



You have 10 calendar days (**until January 14, 2023**) to appeal the Director's decision to the Planning Commission. The application to appeal can be found here, and the fee is $6,714. Please let me know if you have any questions.

Thank you,
Noor

Sachnoor Bisla | City Planner
Planning and Economic Development Department |100 Santa Rosa Ave | Santa Rosa, CA 95404
Tel. (707) 543-3223 | Fax (707) 292-0963 | sbisla@srcity.org

City of Santa Rosa

Due to increased demand, limited resources, and time constraints, delays are expected in the City's permit processing. The Planning Division anticipates returning to standard processing and response times by Fall 2022. Thank you for your patience and understanding as City operations are reestablished.

From: Carrie Richey <carrierichey@hotmail.com>
Sent: Tuesday, January 3, 2023 1:44 PM
To: Bisla, Sachnoor <sbisla@srcity.org>
Cc: amandaneue@att.net
Subject: [EXTERNAL] Re: SVR22-020 Notice of Denial

Sachnoor,

I will not be withdrawing anything and will appeal any decision to deny my permit. I am also already part of the lawsuit that is pending against Santa Rosa for its arbitrary STR laws.

Further, I am a host in good standing with the City and have been hosting since 2019. The City has already acknowledged I am in good standing and am grandfathered in, thus this 1,000 feet law does not apply. What would make more sense is for the Director, City Attorney, and I to settle our differences in a way that is beneficial to all parties.

Additionally, my application was filed on March 6, 2022, less than 2 weeks after the application on 2220 Fremont Drive, which is located across a main highway from my property and has absolutely nothing to do with what happens in my neighborhood. This only highlights how arbitrary the laws actually are.

Further, this house sold on 2/14/2022 to someone apparently intending to do STR. This STR is owned by a conglomerate that sets up STR as a profession. They have over 30 STRs. I am not going to let this conglomerate put me out of business after being part of this community since 2018.

Please reach out to me to discuss further. Otherwise, you can proceed with denying and I will appeal and take all legal options that are available to me.

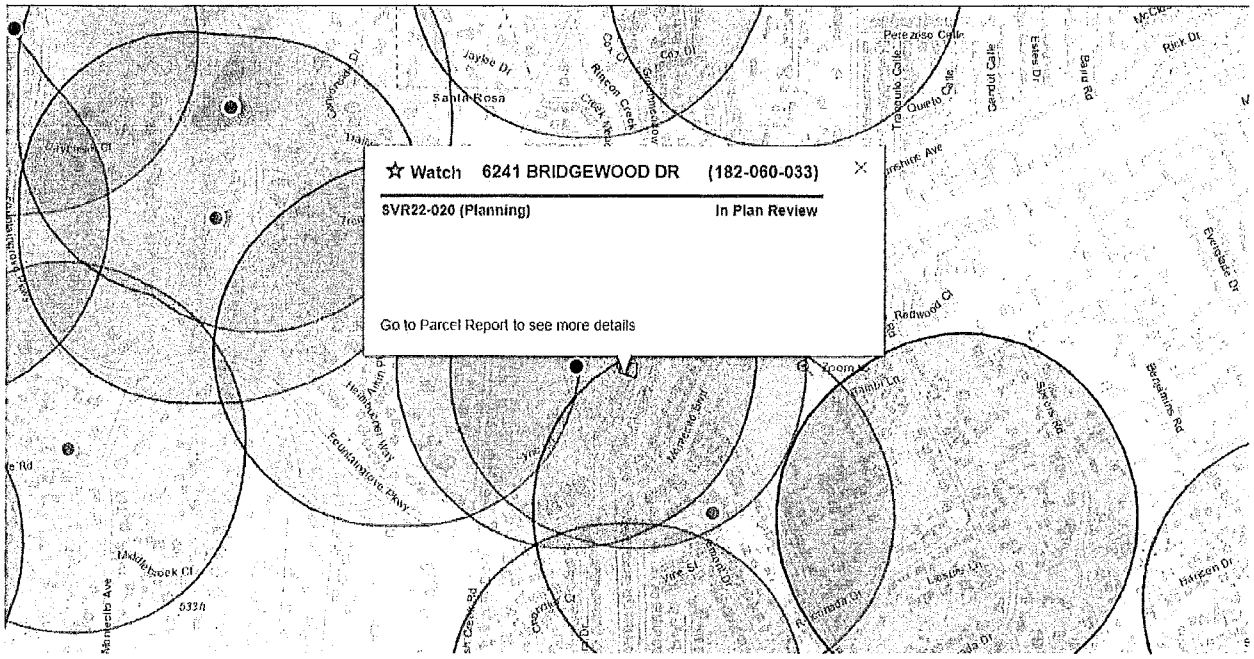
Regards,
Carrie
213-361-1889

From: Bisla, Sachnoor <sbisla@srcity.org>
Sent: Tuesday, January 3, 2023 11:45 AM
To: carrierichey@hotmail.com <carrierichey@hotmail.com>
Cc: amandaneue@att.net <amandaneue@att.net>
Subject: SVR22-020 Notice of Denial

Hello Carrie,

During Planning review, it was determined that your proposed Non-hosted Short-Term Rental at 6241 Bridgewood Drive is located within 1,000 feet of another Non-Hosted Short-Term Rental located at 2220 Fremont Drive (see below) for which a Short-Term Rental Permit has been issued (SVR22-014). Pursuant to the Short-Term Rental Urgency Ordinance Section 20-48.040(B)(3), "After December 3, 2021, no non-hosted short-term rentals may be proposed within 1,000 feet from the property line of another existing or proposed non-hosted short-term rental." The Director has made the decision to deny approval of Short-Term Rental Permit application SVR22-020 because

your proposed Short-Term Rental Permit application does not comply with Section 20-48.040(B)(3) in that it is proposed less than 1,000 feet from an existing Non-Hosted Short-Term Rental at 2220 Fremont Drive which has an earlier application date of February 17, 2022.



I would like to give you the option to withdraw and request a refund equal to 75% ($846.75) of the Short-Term Rental Application fee ($1,129), which represents the remaining funds after accounting for staff time processing your application. **Please reply to this email no later than January 13, 2023, with your request to withdraw, otherwise City staff must deny your permit**.

Thank you,
Noor

Sachnoor Bisla | City Planner
Planning and Economic Development Department |100 Santa Rosa Ave | Santa Rosa, CA 95404
Tel. (707) 543-3223 | Fax (707) 292-0963 | sbisla@srcity.org

City of Santa Rosa

Due to increased demand, limited resources, and time constraints, delays are expected in the City's permit processing. The Planning Division anticipates returning to standard processing and response times by Fall 2022. Thank you for your patience and understanding as City operations are reestablished.

<u>Because I am an Operator in Good Standing, the 1,000 Feet Rule Under Santa Rosa, California City Code "(SRCCC") Short-Term Rental Urgency Ordinance Section 20-48.040(B)(3) Does Not Apply.</u>

A. The 1,000 Feet Rule Under Short-Term Rental Urgency Ordinance Section 20-48.040(B)(3) Does Not Apply to Operators in Good Standing.

SRCCC Section 20-48.040(B)(3) only applies to "New Non-Hosted Short-Term Rentals." *Id.* Specifically, it reads "New Non-Hosted Short-Term Rentals. After December 3, 2021, no non-hosted short-term rentals may be proposed within 1,000 feet from the property line of another existing or proposed non-hosted short-term rental." *Id.*

"Operator in Good Standing" are "grandfathered in" under the short-term renal laws. Operators in Good Standing may continue to rent, offer, or advertise an existing short-term rental at the location specified in the Short-Term Rental Permit application while obtaining required City approvals. SRCC 20-48.404.B.1.a.

Thus, this section only applies to new short-term rentals.

B. I am an Operator in Good Standing

I have been renting my home in Santa Rosa on Airbnb since 2019 and paying TOT taxes. "Operator in Good Standing" is defined as "A short-term rental operator who has registered on or before October 27, 2021 to pay the City's Transient Occupancy Tax (TOT) and Santa Rosa Tourism Business Improvement Area (BIA) assessments and for those operators who were not registered for TOT and BIA assessments before October 7, 2021, has provided proof of prior operation of the short-term rental during 2021." *See* SRCC 20-48.030. My short-term rental has been in operation since May 2019, and the City recognized that I am an Operator in Good Standing (**<u>Exhibit A</u>**) and recognized my Operator in Good Standing status and recently sent me a request to pay TOT tax. *See* **<u>Exhibit B</u>**. Exhibit B references my TOT number which I am entitled to use until my short-term rental application is approved.

a. The California Court of Appeals Has Held that Legislature Cannot Govern By Silence

In the Short-Term Rental context, the California Court of Appeals has held that silence in legislation is not a prohibition. "Courts are reluctant to accept that legislatures enact important or fundamental changes by silent indirection." *People v. Venice Suites, LLC*, 71 Cal. App. 5th 715, 733, 286 Cal. Rptr. 3d 598, 611 (2021), review denied (Feb. 23, 2022). In *Venice Suites*, the Court held that residential zone *not* specifying length of occupancy did not implicitly prevent apartment house from being used for short-term occupancies of 30 days or less. *Id.* at 610-613.

b. Short-Term Urgency Ordinance Is Silent As to Revocation of Operator in Good Standing Status.

Carrie
Nowhere does the Short-Term Rental Urgency Ordinance state that by not filing for a permit by December 3, 2021 you will no longer be considered an Operator in Good Standing.

First, SRCC 20-48.404.B.1. simply states that Operators in Good Standing shall submit the Short- Term Rental Permit Application Fee to Planning and Economic Development by December 3, 2021. SRCC does not state that Operators in Good Standing may no longer offer a short term rental if the application is filed after December 3, 2021. SRCC only states that if your application is denied that you may no longer rent. My application had not been denied at the time it was revised by the City. It was pending. Specifically, SRCC 20-48.404.B.1. states:

> B. Application submittal.
>
> 1. Operators in Good Standing. Operators in Good Standing shall submit a Short-Term Rental Permit Application for existing Short-Term Rentals accompanied by the Short-Term Rental Permit Application Fee to Planning and Economic Development within 51 days of the effective date of the ordinance codified in this chapter, by December 3, 2021.
>
> a. Operators in Good Standing may continue to rent, offer, or advertise an existing short-term rental at the location specified in the Short-Term Rental Permit application while obtaining required City approvals, except as specified in subsection (b) below. All advertisements shall include the Transient Occupancy Tax account number assigned by the Finance Department until the Short-Term Rental Permit has been approved.
>
> b. If the Short-Term Rental Permit Application is denied, the Operator is no longer considered an Operator in Good Standing and shall immediately cease renting, offering, or advertising the short-term rental.

SRCCC Section 20-48.040(B)(1). Thus, the ordinance explicitly lists the only scenario when Operator in Good Standing status can be revoked – once the short-term rental application is denied. At the time my permit was reviewed, my Operator in Good Standing had not been revoked; thus, I was an Operator in Good Standing.

c. The City Has Recognized that Definitions and Explicit Language of the Urgency Ordinance DO MATTER In the Interpretation of the Short-Term Rental Urgency Ordinance.

The City has previously recognized that when the Short-Term Rental Urgency Ordinance is silent, it does not provide proper notice. The same is true here. The ordinance does not state that operators in good standing status will be revoked if an application is not filed by December 3, 2021.

Similarly, the Ninth Circuit has recognized that if a statute is silent, it is not a prohibition.

On or about August 9, 2022, the City passed an additional Ordinance to correct the language of the Short-Term Rental Urgency Ordinance because the original ordinance did not state that a particular provision applied to Operators in Good Standing. Specifically, Ordinance No. ORD-2022-008 states that it "will clarify that the three-step violation process applies to operators in good standing as well as short-term rental permit holders." The ordinance then adds "revocation of operator in good standing status" to the table regarding enforcement penalties. It previously stated that the violation process applied only to holders of permits.

Here, the Short-Term Rental Urgency Ordinance does not state that operator in good standing status will be revoked if the application is not filed by December 3, 2021. In fact, the ordinance explicitly lists the only scenario when status can be revoked – once the short term rental application is denied. My application was not denied when it was reviewed.

a. Filing a Permit After December 3, 2021 Does Not Shoehorn My Operation Into a New None-Hosted Short-Term Rental.

By definition, I am not a New Operator under SRCC Sec. 20-48.040.B.2.b. A New Operator is defined in SRCC as "A short-term rental owner who has not registered on or before October 27, 2021 to pay the City's Transient Occupancy Tax (TOT) and Santa Rosa Tourism Business Improvement Area (BIA) assessments." I have a TOT number prior to October 27, 2021, which has been recognized by the City near the end of 2022 (**Exhibit B**); thus, this definition does not apply to me.

C. Failure to Continue to Recognize Operation in Good Standing Status Without an Opportunity to Be Heard Is a Violation of My Due Process Rights

By the City recognizing that I am an Operator in Good Standing, the City cannot revoke that property right without due process of law. "[N]or shall any state deprive any person of life, liberty, or property, without due process of law…." *Lingle v. Chevron*, 125 S.Ct. 2074 (2005). A property owner's substantive due process rights are violated when government action (such as denial of a permit) is arbitrary or unreasonable. *Id., see also Crown Point Development, Inc. v. City of Sun Valley*, 506 F.3d 851 ((9th Cir. 2007). If the City deems my good standing status has been revoked, this decision is arbitrary and unreasonable because I was not given an opportunity to be heard, and the City has not established a reasonable basis to revoke my status. Also, the entire short-term governance was acted by emergency legislation without any input from the community. Thus, the entire construct of this law violates constituents' due process rights. It is also arbitrary and unreasonable to require Operators in Good Standing to cease operations even though an application is pending that has yet to be denied and it may be many months until the City reviews the backlog of pending applications.

The failure for the City to no longer recognize that I am an Operator in Good Standing in reviewing my application is a de facto permit revocation or modification. Under SRCC 20-

54.100, I am entitled to a Hearing and notice before the City may revoke my ability to use the Property as a short-term rental:

> An approved land use permit or Variance may be revoked, or the conditions of approval or other provisions of the permit or Variance may be modified in compliance with this Section.
>
> A. Hearings and notice.
>
> 1. The review authority shall hold a public hearing to revoke or modify an application, permit, or Variance granted in compliance with the provisions of this Zoning Code.
>
> 2. Ten days before the public hearing, notice shall be mailed to the applicant and/or owner of the property for which the permit or Variance was granted, in compliance with Chapter 20-66 (Public Hearings).
>
> 3. Notice shall be deemed delivered two days after being mailed, certified and first class, through the United States Postal Service, postage paid, to the owner as shown on the County's current equalized assessment roll and to the project applicant, if not the owner of the subject property.
>
> B. Review authority action.
>
> 1. Land use permits. A land use permit may be revoked or modified by the review authority which originally approved the permit (e.g., Zoning Administrator, Commission, or Council), or the equivalent City review authority for permits originally approved by the County, after first making one or more of the following findings:
>
> a. Circumstances under which the permit was granted have been changed by the applicant to a degree that one or more of the findings required to grant the original permit can no longer be made;
>
> b. Permit issuance was based on misrepresentation by the applicant, either through the omission of a material statement in the application, or in public hearing testimony;
>
> c. One or more conditions of approval have been violated, or have not been complied with or fulfilled;
>
> d. The use or structure for which the permit was granted no longer exists or has been discontinued for a continuous period of at least 180 days, as defined in Chapter 20-61 (Nonconforming Uses, Structures, and Parcels);
>
> e. Failure or refusal to allow inspections for compliance; or
>
> f. Improvements authorized by the permit are in violation of any code, law, ordinance, regulation, or statute, or the use or structure is being operated or maintained in a manner which constitutes a nuisance.

SRCC 20-54.100. Because the City recognized that I am an Operator in Good Standing, I therefore had a property right to use the Property as a short-term rental. The City without due

process revoked that right.

D. 1,000 Foot Rule Is Arbitrary and Capricious

Finally, the 1,000-foot rule is arbitrary and capricious. The facts of this case highlight just how arbitrary the rule is.

My application was denied because a permit was approved at 2220 Fremont Drive. This address is across a major road from my address. What happens in that neighborhood has no impact on what happens in my neighborhood.

Further, 2220 Fremont Drive sold on February 14, 2022 to someone apparently intending to do STR. Thus, this person did not even own the house on December 3, 2021. Strikingly, the owner of the 2220 Fremont Drive owns or manages 29 short-term rentals! **Exhibit C** (2220 Fremont Drive is "Wine County Backyard Escape"). This corporation-alizing of homes is exactly what the ordinance should be preventing.

Whereas I have owned my house since 2018, used to work in Santa Rosa, and turned my house into a short-term rental when I moved back to San Francisco. I use short-term rentals to make ends meet.

Additionally, the City has passed an updated ordinance limiting the number of short-term rentals to 198, obviating the need for the 1,000 foot rule. According to the City's website, it has not issued 198. *See* **Exhibit D** (showing 164 permits have issued or are closed).

EXHIBIT A

CITY TRANSIENT OCCUPANCY TAX (TOT) & CITY BUSINESS IMPROVEMENT AREA (BIA)
QUARTERLY RETURN

City of Santa Rosa

FINANCE DEPARTMENT
REVENUE DIVISION
90 Santa Rosa Avenue P.O. BOX 1673
Santa Rosa, CA 95402-1673
707-543-3170
revenue@srcity.org
www.srcity.org/tot

Richey, Carrie
137 Milton St
San Francisco, CA 94112

Site Address: 6241 Bridgewood Dr — **QUARTER ENDED: 3/31/2022**

TOT Account Number: 3053 — **DUE DATE: 04/30/2022**

This form must be completed and returned with remittance not later than 30 days after the above date, or penalties and interest will be added. Make check payable to City of Santa Rosa at the address stated above.

1. Gross Rent Charged or Received (excluding tax) — $ 9073.06
   Report total amount of all rents charged, whether actually received or not.
2. Less Exempt Rent: Non-Transients — $ —
   Amount of rents charged occupants who have remained as tenants for more than 30 consecutive days.
3. Less Exempt Rent: Exempt Government Employees — $ —
   Amount of rents charged representatives of exempt government agencies. *Return original copy of each Exemption Certificate with this return form. The amount reported must be the total of the amounts shown on the certificates.Print out forms by visiting: srcity.org/tot
4. Total Exempt Rent (line 2 plus line 3) — $ ~~9073.06~~
5. Net Taxable Rent (line 1 minus line 4) — $ 9073.06
6. **Transient Occupancy Tax (9% of Line 5)** — $ 816.58
7. **City Tourism BIA (3% of Line 5)** — $ 272.19
8. Less Tax Returned to Occupants Staying Over 30 Days — $ —
9. Net Tax (Sum of line 6 plus line 7 minus line 8) — $ 1088.77
10. Add Penalty (if any due) — $
    Tax is due within 30 days of the close of the reporting period. If taxes are not received within 30 days, there will be a penalty of 10% on the taxes due. Additional 10% for continued delinquency.
11. Add Interest (if any due) — $
    In addition to the penalties imposed, interest shall be added to the amount due at the rate of ½ of 1% per month or fraction thereof on the amount of the tax, exclusive of penalties, from the date on which the remittance first became delinquent until paid.
12. TOTAL AMOUNT DUE AND REMITTED HEREWITH (Sum of lines 9, 10 & 11) — $ 1088.77

I hereby certify under penalty of perjury that the foregoing statements contained in this return are true and correct to the best of my knowledge and belief.

Date: 4-13-22 Signature: Carrie Richey Title Owner

Print Signature Name Carrie Richey Phone 213-301-1889

Records pertaining to this tax must be kept for three years. For further details, refer to City of Santa Rosa Code Section 3-28.

**City Code Section 3-28.03 B & C define exempt governmental agencies as follows:*

B. Any Federal or State officer or employee when on official business (NOTE: does not apply to city or county officers or employees)

C. Any officer or employee of a foreign government who is exempt by reason of express provision of federal law or international treaty.

No exemption shall be granted except upon a claim therefore made at the time rent is collected and under penalty of perjury upon a form prescribed by the tax collector.

EXHIBIT B

EXHIBIT B

revenue@srcity.org
www.srcity.org/tot

Richey, Carrie
137 Milton St
San Francisco, CA 94112

Site Address: 6241 Bridgewood Dr

TOT Account Number: 3053

QUARTER ENDED: 9/30/2022
DUE DATE: 10/31/2022

This form must be completed and returned with remittance not later than 30 days after the above date, or penalties and interest will be added. Make check payable to City of Santa Rosa at the address stated above.

1. Gross Rent Charged or Received (excluding tax) $ _____
   Report total amount of all rents charged, whether actually received or not.
2. Less Exempt Rent: Non-Transients $ _____
   Amount of rents charged occupants who have remained as tenants for more than 30 consecutive days.
3. Less Exempt Rent: Exempt Government Employees $ _____
   Amount of rents charged representatives of exempt government agencies. *Return original copy of each Exemption Certificate with this return form. The amount reported must be the total of the amounts shown on the certificates. Print out forms by visiting: srcity.org/tot
4. Total Exempt Rent (line 2 plus line 3) $ _____
5. Net Taxable Rent (line 1 minus line 4) $ _____
6. **Transient Occupancy Tax (9%** of Line 5) $ _____
7. **City Tourism BIA (3%** of Line 5) $ _____
8. Less Tax Returned to Occupants Staying Over 30 Days $ _____
9. Net Tax (Sum of line 6 plus line 7 minus line 8) $ _____
10. Add Penalty (if any due) $ _____
    Tax is due within 30 days of the close of the reporting period. If taxes are not received within 30 days, there will be a penalty of 10% on the taxes due. Additional 10% for continued delinquency.
11. Add Interest (if any due) $ _____
    In addition to the penalties imposed, interest shall be added to the amount due at the rate of ½ of 1% per month or fraction thereof on the amount of the tax, exclusive of penalties, from the date on which the remittance first became delinquent until paid.
12. TOTAL AMOUNT DUE AND REMITTED HEREWITH (Sum of lines 9, 10 & 11) $ _____

I hereby certify under penalty of perjury that the foregoing statements contained in this return are true and correct to the best of my knowledge and belief.

Date: _____ Signature: _____ Title _____

Print Signature Name _____ Phone _____

ecords pertaining to this tax must be kept for three years. For further details, refer to City of Santa Rosa Code Section 3-
3.

EXHIBIT C

EXHIBIT C

Savannah

Verified

0

Host Extraordinaires
December 2021

We absolutely loved having Savannah stay with us. Best wishes in the future and hopefully we will...read more

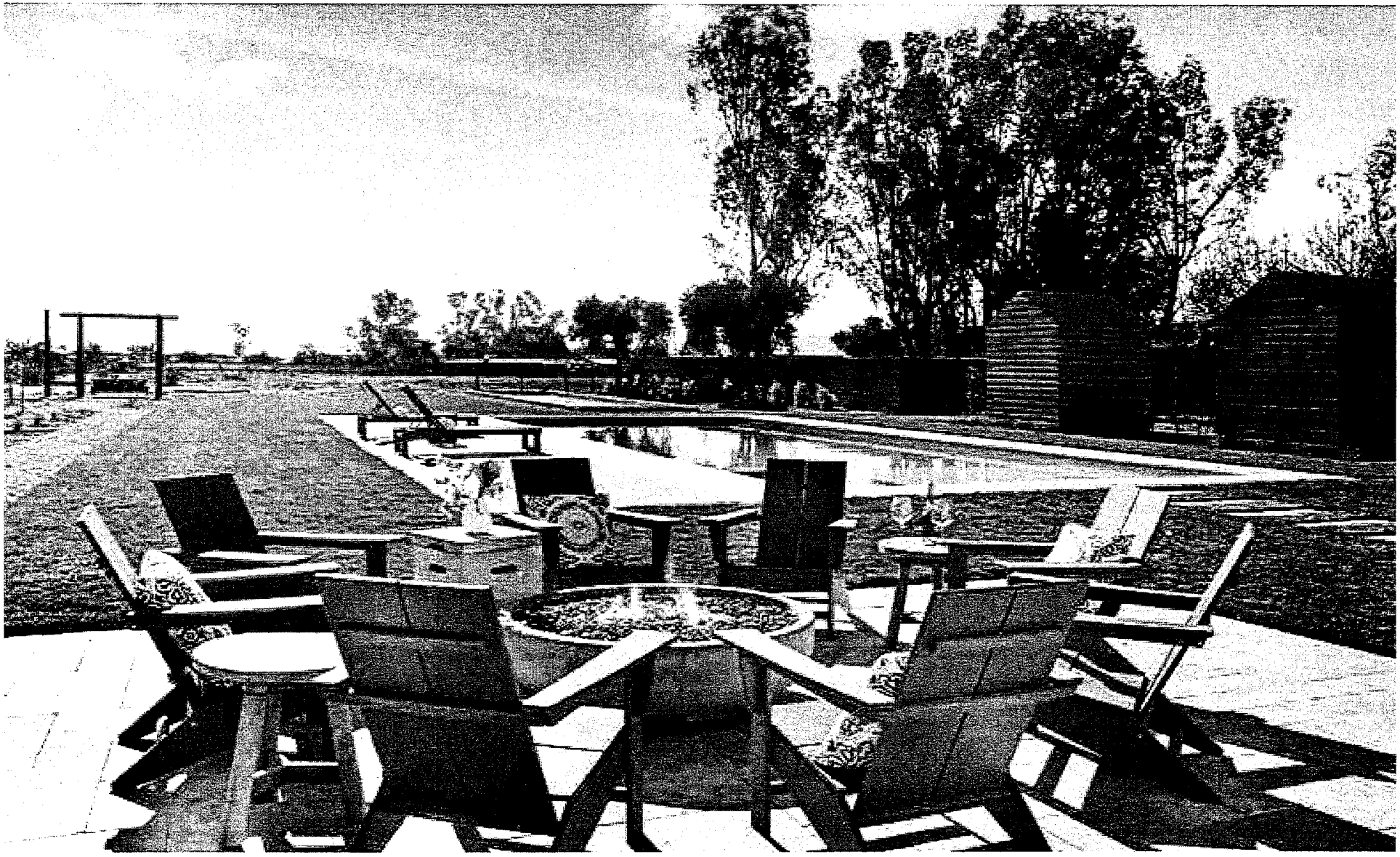
Read more reviews

29 listings

Go to map

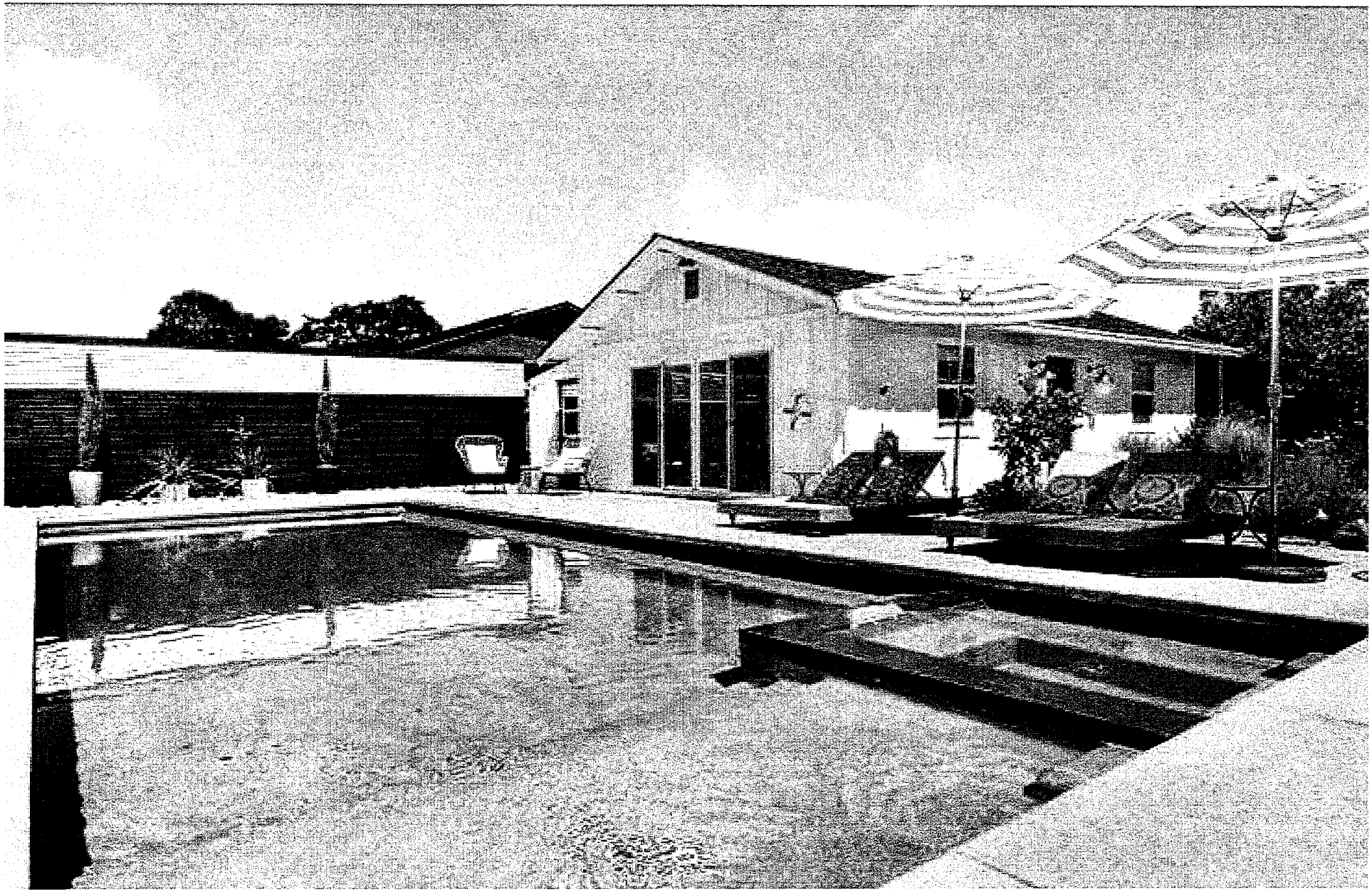
$416 Windsor Wine Country Anthony Escape

50 reviews



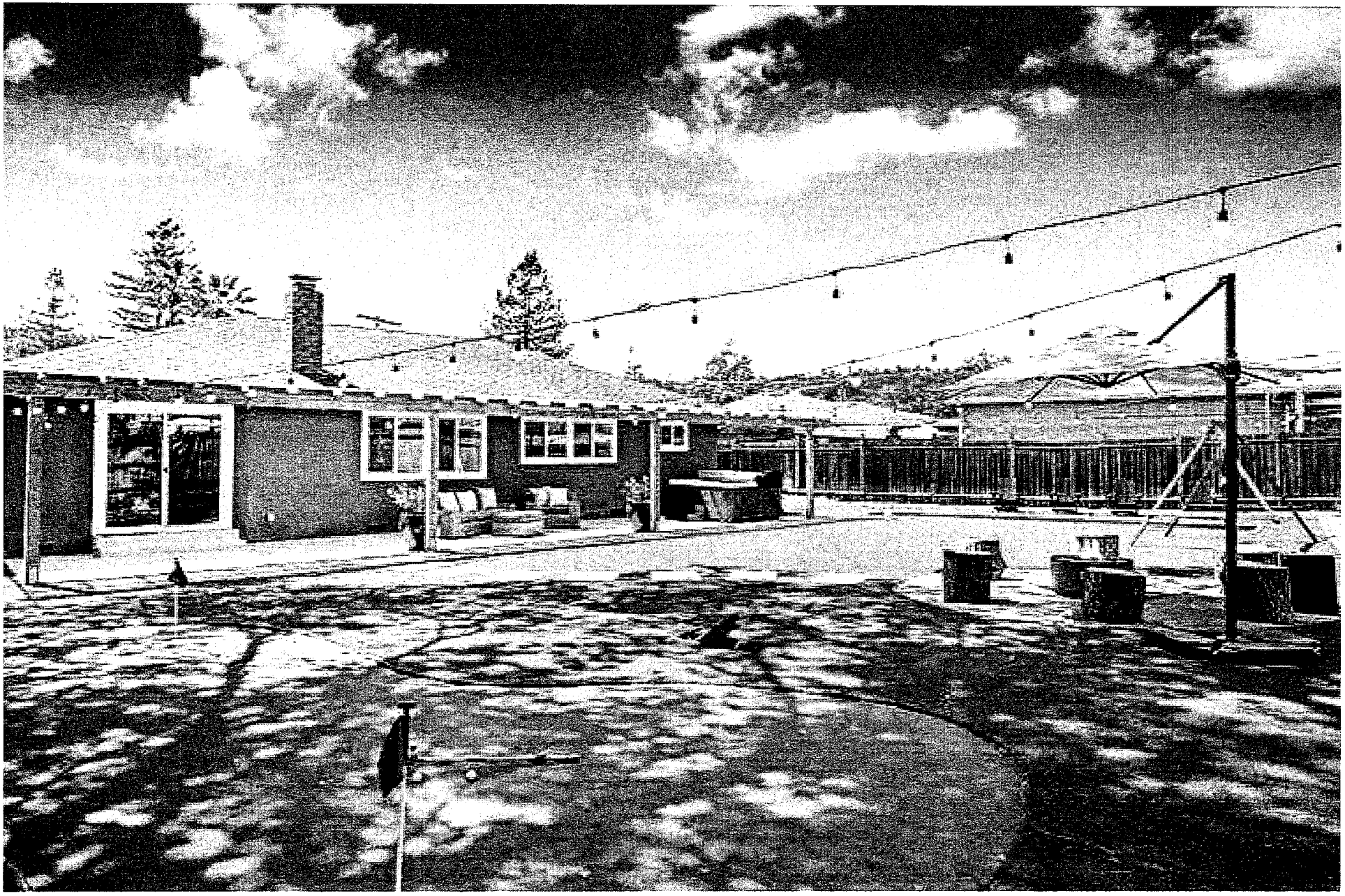
$609 The Acacia Farmhouse Sonoma

40 reviews



$956 The Palmer Farmhouse Sonoma

30 reviews



$343 Wine Country Backyard Escape

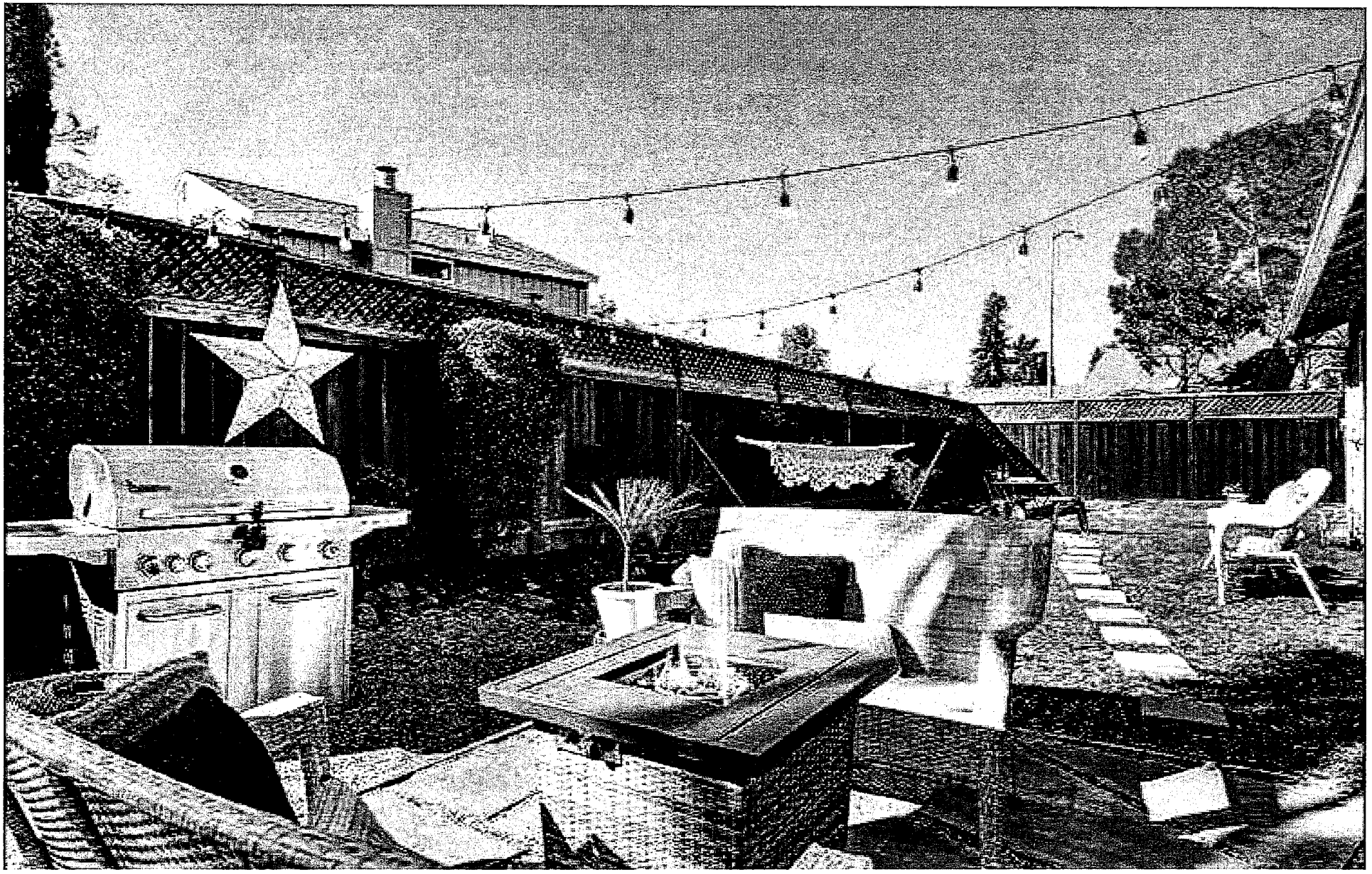
8 reviews

$371 Sonoma Springs Wine Country Cottage

217 reviews

$391 Newcomb Wine Country Cottage Downtown Sonoma

19 reviews

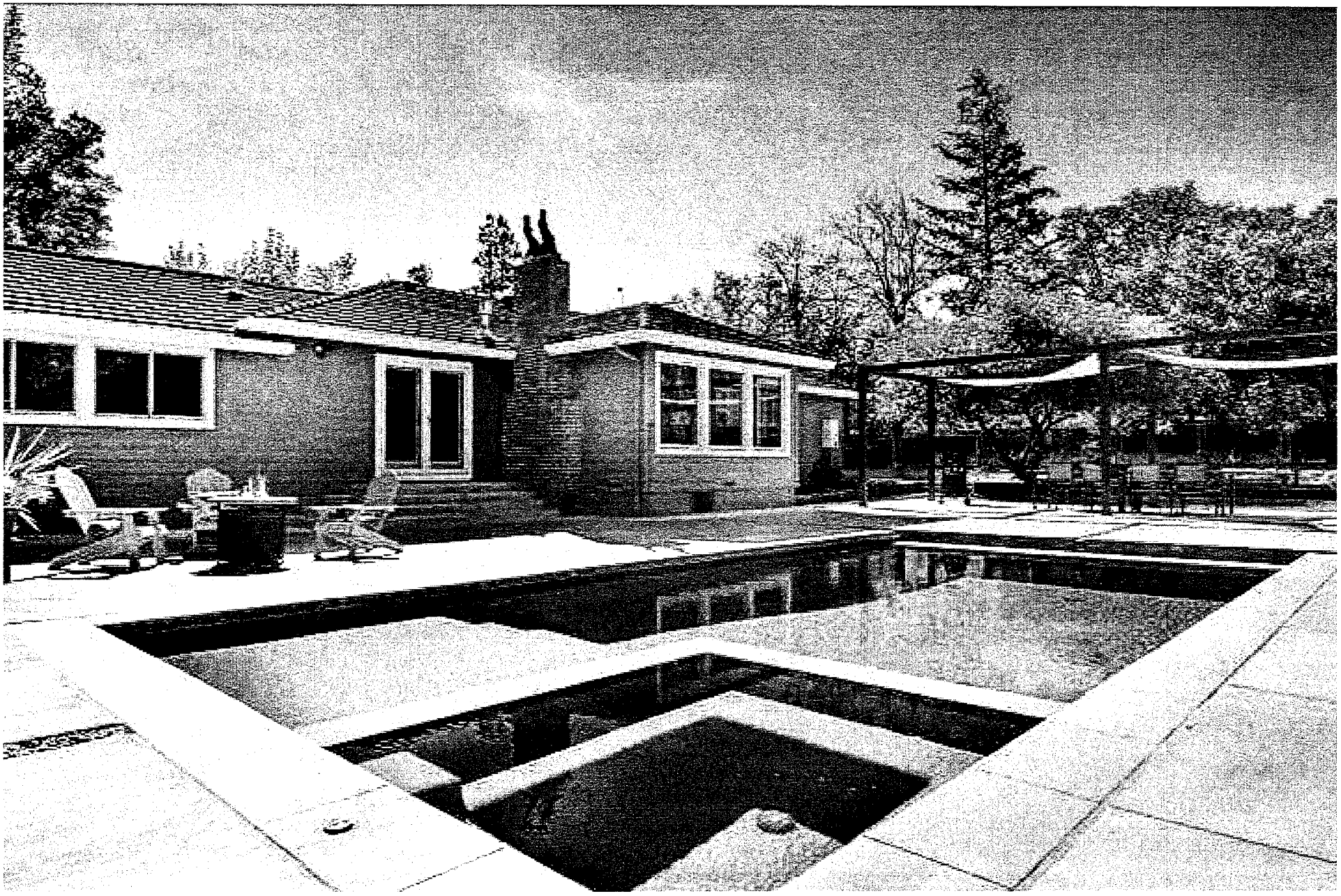


$192 Wine Country Bungalow

34 reviews

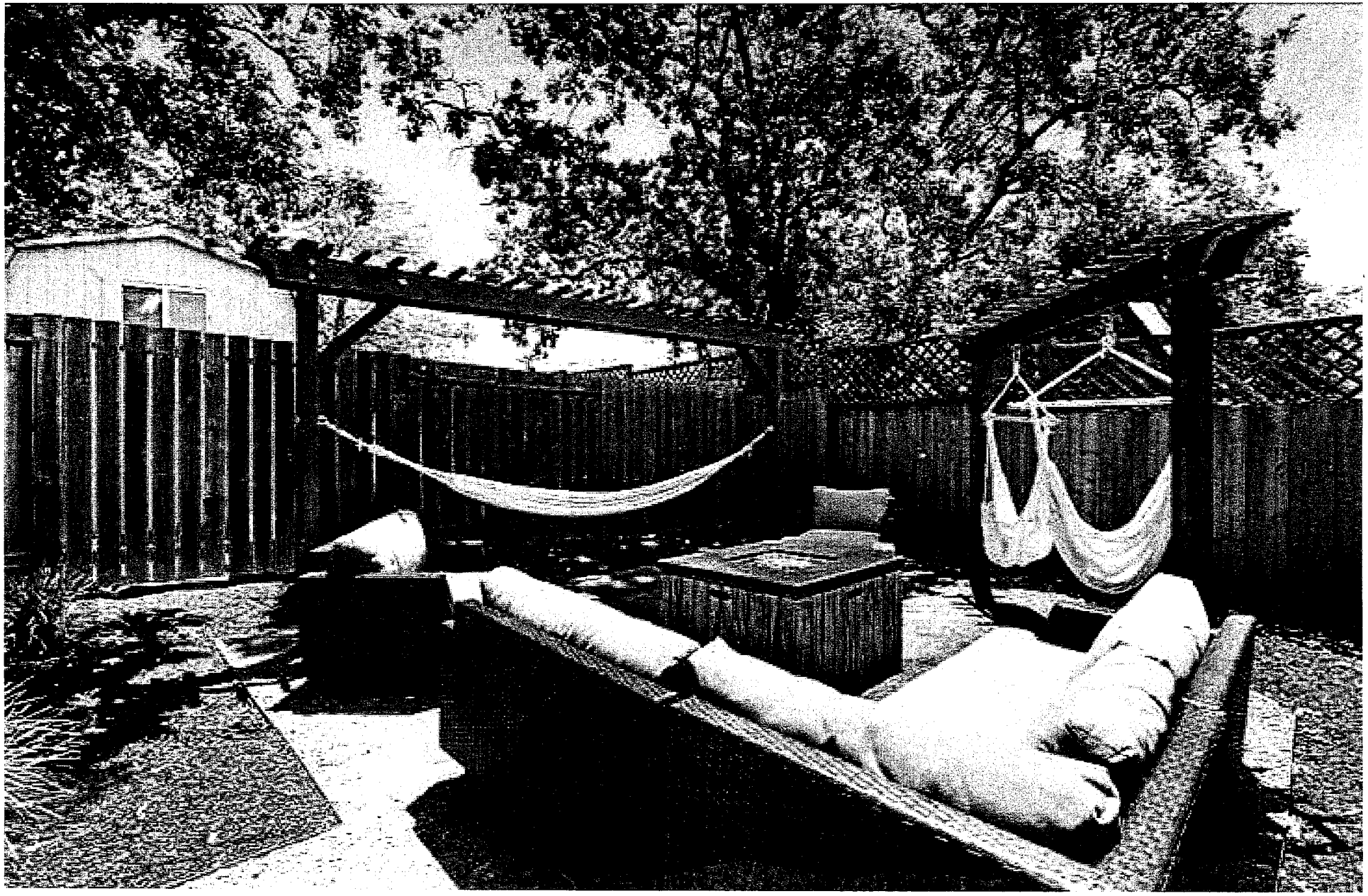
$389 Wine Country Harvest Vacation Home

48 reviews



$457 Sonoma Country Club Wine Country Rental

8 reviews



$205 Wine Country Cottage

79 reviews

1 2 3

1 – 10 of 29

Enter dates and search to see full pricing.

Support

Help Center

AirCover

Supporting people with disabilities

Cancellation options

Our COVID-19 Response

Report a neighborhood concern

Community

Airbnb.org: disaster relief housing

Combating discrimination

Hosting

Airbnb your home

AirCover for Hosts

Explore hosting resources

Visit our community forum

How to host responsibly

Airbnb

Newsroom

Learn about new features

Letter from our founders

Careers

Investors

Gift cards

English (US) $ USD

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EXHIBIT D

EXHIBIT D

- Log In
- Search

Non-Hosted Short Term Rentals

209 Parcels. 224 Permits.

Go To Hosted Only | Go To All Short Term Rentals | Measure

Find APN/Address

1000 ft Buffers are shown around non-hosted rentals. Select the Erase button to remove them.

Legend

- **Submitted** (2)
- **In Process/Under Review** (50)
- **Issued/Closed** (164)
- **Closed/Denied** (8)
- **Withdrawn** (12)
- **Renewal** (15)

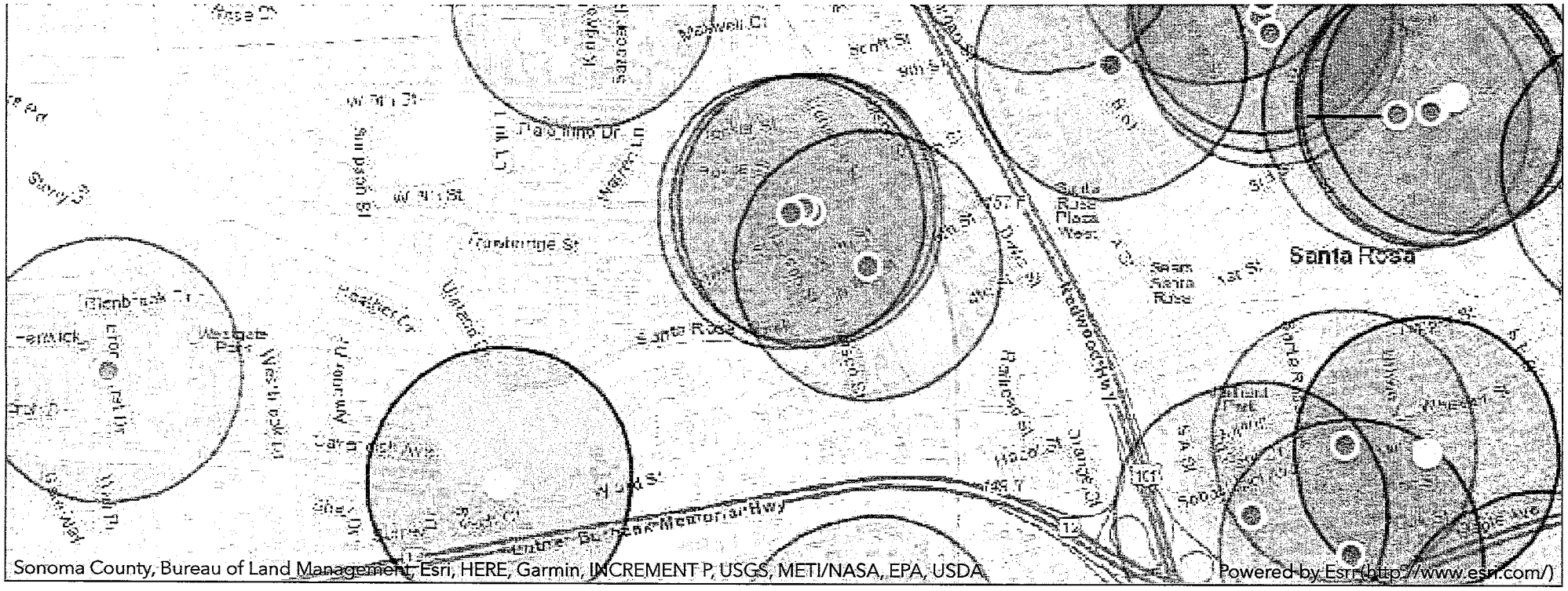
Measurement Layer

Permits

2022 SR Aerial

2013 Aerial

All Parcels


Santa Rosa
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