

**SANTA CRUZ COUNTY PLANNING DEPARTMENT POLICY/ORDINANCE  
INTERPRETATION**

Interpretation No.: RA-1 (Riding academies, public stables, and commercial boarding of horses in the RA Zone District)  
Effective Date: 01/01/03  
Originally Issues: 06/27/96 (Pete Parkinson, Commercial Boarding, RA Zone)

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**Question**

*Are riding academies, public stables, or commercial boarding of horses allowed in the RA (Residential Agricultural) zone district and, if so, what level of approval is required and is a residential use required on the property?*

**Applicable Ordinance Section(s)  
And/or General Plan/LUP Policy(ies)**

§13.10.321(b)  
§13.10.322  
§13.10.611(c)  
§13.10.641  
§13.10.643  
§13.10.644

**INTERPRETATION:**

**Riding academies, public stables, or commercial boarding of horses are allowed in the RA zone district with a Level 5 approval. For the purposes of the County Code, commercial boarding occurs when the density of horses exceeds 2 per acre. No residential use is required on the property. However, without a residential use, a stable, commercial or non-commercial would be limited to a 12 foot high, 600 square foot building with no plumbing or electricity. With a residential use, a non-commercial stable not exceeding 1000 square feet requires a Level III use approval. The size of a commercial stable where there is a residential use would be at the discretion of the Zoning Administrator (Level V use approval) at a public hearing.**

**Reason**

The concentration of animals such as horses can lead to erosion and sedimentation problems, contamination of water courses, and nuisances to nearby residential uses. The zoning ordinance regulates the concentration of animals to thereby reduce or eliminate erosion, sedimentation, and contamination problems. To this end, the zoning ordinance contains regulations pertaining to the number of animals that may be boarded commercially in the Residential Agricultural (RA) zone district. The purpose of the RA zone district is “[t]o provide areas of residential use where development is limited to range of non-urban densities of single-family dwellings in areas

***13.10.321(b)***

outside the Urban Services Line and Rural Services Line...and where small-scale commercial agriculture...can take place in conjunction with the primary use of the property as residential.”

The residential use chart (Section 13.10.322) indicates that a Level 5 use approval is required for “[s]tables, boarding, and public riding” in the RA zone district, “subject to Section 13.10.641.” Section 13.10.641(a) states that two horses may be kept on a minimum lot area of one acre and that “[a]n additional horse may be kept for each twenty thousand (20,000) square feet by which the parcel of land exceeds one acre.” Section 13.10.641(b) states “[w]here horses, ponies, burros or other animals are boarded at a density greater than 2 per acre, a Level V use approval shall be required.” Therefore, if the density of animals boarded is equal to or less than 2 per acre, whether or not there is a fee for boarding, no use approval is required. Conversely, if the density of animals boarded is greater than two per acre, whether or not a fee is charged, then commercial boarding is presumed and a Level V approval is required.

Neither the residential use chart nor Section 13.10.641 requires a residential use on the property. Without a residential use though, a stable would be limited to a 12 foot high, 600 square foot building with no plumbing or electricity. The residential use chart lists non-habitable accessory structures used for animal enclosures and stables not exceeding 1000 square feet in the RA zone district as requiring a building permit only. Such a structure that exceeds 1000 square feet requires a Level III review. However, Section 13.10.611(c) limits accessory structures to no more than 12 feet in height and 600 square feet in size “in the absence of a main structure or main use of the land.”

Section 13.10.321(b) states that the purpose of the RA zone district is to “provide areas...where small-scale commercial agriculture, such as animal-keeping... can take place in conjunction with the primary use of the property as residential.” The term “animal-keeping” is not defined in the Zoning Ordinance. However, Section 13.10.643, Animal-keeping in the Residential-Agricultural Zone District does provide requirements for minimum parcel size for animal-keeping and density of animals, as follows:

- (a) The following minimum acreage standards are required when keeping Animals in the Residential-Agricultural Zone District:
  1. On a minimum site of one acre, not more than two per acre of horses, cows, or hog, or a combination thereof; or
  2. On a minimum site of one-half acre, not more than four per acre of sheep, goats, or a combination thereof; or one hundred per acre of fowl, rabbits, or similar small animals except mink; beehives;
  3. On a minimum site of ten acres, the number of animals permitted is not limited, except that no more than six brood sows may be kept on any site.
- (b) The provisions of Section 16.22.060, pertaining to erosion control, shall apply.
- (c) For purposes of interpretation, a cow, llama, pig, or other large animal may equal a horse.

Because the primary purpose of the RA zone district is to provide for single-family residential uses, more intensive equestrian uses such as riding academies and riding stables that provide horse training, horse sales, clinics, horse shows, riding lessons, and camps appropriately require review at a public hearing.

Riding academies or public stables are conditionally permitted uses in all agricultural zone districts (CA, A, AP) and public and private boarding and riding stables are conditionally permitted uses in the PR (Parks, Recreation, and Open Space) zone district.

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Alvin James, Planning Director