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ARCHITECT

19 September 2026

To: Sebastopol Planning Commission and City Council

**RE: Development Proposal by Grupe Investment Company for
8100 Valentine Avenue (Mormon Church)
Comments for Planning Commission Meeting of 9/22/26**

Planning Commissioners and City Council Members,

The project site for this proposed development is zoned R4, single family Medium Density Residential, with maximum density of 8.7 units per acre. The applicant has submitted an application for a Subdivision Tentative Map, requesting many deviations from the Development Standards required in this R4 zone. These deviations include reductions in minimum lot size, lot width, and setbacks. However, a significant deviation from the zoning standards is that this proposal does not provide for on-site parking, as required by Zoning Ordinance section 17.110.010.C.3. This proposal for grouping housing units together in some areas and off-site parking in other areas is not consistent with the intent or specific Development Standards of the R4 zone, and is significantly different from the character of the existing surrounding neighborhood. Therefore, an application for Subdivision Tentative Map, with request for some minor deviations from the R4 requirements, is not appropriate.

The Zoning Ordinance does allow for certain residential development types that are not consistent with the typical zoning criteria. A Planned Community District is one development type that can be considered in the R4 zone. Per Zoning Ordinance section 17.40.010:

“The purpose of the PC Planned Community District is to allow for comprehensively designed and well-planned residential developments which create an integrated community wherein all land uses are planned and designed in a comprehensive “master plan” approach, including such aspects as roadways, open space, infrastructure, architecture, and landscaping. The Planned Community District provisions are intended to encourage, through utilizing freedom of design which may deviate from the strict requirements of, but which will surpass the quality required by, the zoning regulations...”

After careful review of the project proposal, it is clear that the application submitted is for a Planned Community District (PC), not a simple Subdivision, and must be analyzed by staff as such. Requirements for Planned Community District review and approval are specified in Zoning Ordinance section 17.40, including that the applicant must:

- Submit a Policy Statement along with the development plans, which must include specific information regarding the proposed project, the existing zoning standards, and the character of the existing surrounding neighborhood. This Policy Statement has not yet been submitted by the applicant.
- Apply for a Conditional Use Permit and Rezone to PC zone by the Planning Commission and City Council.

Considering that the proposed project is indeed a Planned Community, I believe that the applicant should not be able to use State law AB1033 as a means to by-pass our Zoning Ordinance and exceed the maximum allowable density. A Planned Community is a discretionary approval by the City. The Commission/Council can deny any Planned Community proposal, and can set the number

of lots to be created for the project. For instance, the approval could be for a project with the number of lots created such that, if each lot has a primary residence and an ADU, the total number of units would not exceed the maximum allowable density for the property. In this case, the developer would abandon the ploy of constructing the ADU's and simply subdivide the property up to the maximum allowable density.

Proposed Setbacks:

- Per Zoning Ordinance section 17.40.050, building “*setbacks and heights at the periphery of the (Planned Community) development shall be compatible with the requirements established by the abutting zone district*” (R4). This means that where the development abuts a neighboring property, the project building setbacks must meet or exceed the R4 rear or side setback for that property as applies. The current project design does not meet this requirement. Nearly all of the properties that abut the project site share a rear property line with the site, which therefore requires a 20 foot or greater project building setback from those property lines. I believe that the increased setbacks may also satisfy some of the tree preservation concerns that have been raised by others.
- Also, there are many proposed buildings with setbacks of zero feet. Walls within three feet of the property line must be fire rated, and cannot have windows. The fact that there are buildings proposed to be located on a property line helps demonstrate that the proposed lot sizes are too small for the proposed buildings on them, and that this project is too dense.

Project Architecture:

- I could not find any drawing or schedule in the submittal materials that indicates which unit floor plan goes on which lot...?!
- The exterior elevations recently submitted are improvements over those submitted for the preliminary project review meeting last March. I am happy to see that the low slope shed roof designs are gone.
- However, there are still some exterior elevations that are quite unattractive, and in need of trim or dimensional relief. There are some exterior elevations that are just blank stucco walls, presumably the walls located on the property lines. Note that the two story building elevations on the property lines (two stories of a blank stucco wall!) are not included in the current drawing submittal package, which is misleading.

Conclusion:

I support more affordable-by-design market rate housing in Sebastopol, but I feel strongly that this project, as currently designed, is too dense for this neighborhood. I suggest that this application is denied, and that the applicant return with one of the following:

- A Subdivision proposal that is in conformance to the Development Standards specified in the Zoning Ordinance for the R4 zone.
- A Planned Community District proposal that is in conformance to section 17.40 of the Zoning Ordinance.
- Also, as I stated in my comments at the preliminary public meeting in March, I think that a Small Lot Subdivision, conforming to section 17.230 of the Zoning Ordinance, would be a good design solution for this site. However, please note that, as currently proposed, this project does not qualify as a Small Lot Subdivision for the reasons stated above, including setbacks and lack of on-site parking.

Thank you for your review and consideration of these comments.