

Comments

1. I was informed by staff that this application would be for a Small Lot Subdivision. I am in support of Small Lot Subdivisions as a way of providing market rate housing that is “affordable by design”. As a member of the Planning Commission during the most recent General Plan and Zoning Ordinance updates, I was a strong advocate for easing the Development Criteria for Small Lot Subdivisions. When I learned that this church property was being sold to a developer, I was hoping that the proposed design would be for a Small Lot Subdivision.
Unfortunately, this project clearly does not meet the criteria for a small lot Subdivision, as specified in Chapter 17.230 of the Zoning Ordinance:
 - a. The proposed front and rear setbacks do not conform to the required minimum setbacks.
 - b. The parking requirement of 2 onsite spaces per dwelling is not met.
 - c. The intent of a Small Lot Subdivision development is to provide single family residential housing on individually owned lots, similar in character to the adjacent existing housing in this R4 zone, but on smaller lots, so as to provide more, and relatively less expensive housing options. This project does not meet that criteria.

2. It is clear to me that this proposed project fits the description of a Planned Community (PC). I believe that a proposal for a Planned Community in this location could be approved. The project would need to apply for a re-zone to PC, and the project would be reviewed by staff per Chapter 17.40 of the Zoning Ordinance. Elements of the current design that do not appear to conform to PC criteria include:
 - a. Setbacks at the periphery of the development shall be compatible with the requirements established by the abutting zone district, per Zoning Ordinance section 17.40.050. Therefore, setbacks to the neighboring R4 parcels should be at least 5’ where abutting existing adjacent side yards, and at least 20’ where abutting existing rear yards.
 - b. Maximum Density:
The proposed project has a Land Use Designation of Medium Density Residential (MDR), which has a required density of 2.6-12.0 units per acre. With a site area of 2.95 acres, this project could be developed with a maximum of 35 units.

3. I believe that this project is being inappropriately proposed as a Small Lot Subdivision so as to take advantage of the California SB330 law that has been recently adopted by Sebastopol. This law allows owners of single family parcels to construct and condominiumize an ADU on their property. Because ADUs are not included in density calculations, densities of projects with ADUs could exceed the General Plan Land Use maximum allowable density. As designed, it seems to me to be a real stretch to call some units in this development primary dwellings, and others ADUs. I do not believe it was the intent of the City Council, or the State Senate, to use SB330 in this way.

4. I recommend that the applicant re-design the project in one of two ways:
 - a. Preferred: Submit a Small Lot Subdivision proposal that meets the criteria specified in the Zoning Ordinance. Where lots are large enough, propose ADUs on some lots. To keep the lots affordable, as well as desirable to more prospective buyers, do not include ADUs on all lots. I would suggest half of the lots at most.
 - b. Submit a Planned Community proposal, similar to what has been envisioned, that meets the criteria specified in the Zoning Ordinance, and limit the number of units to 35.