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August 3, 2020

To: Chair Schwartz and Planning Commissioners

Re: Accessory Dwelling Unit Ordinance Amendments (August 6, 2020 Agenda, Item B)

Allied Neighborhoods Association was involved in the ADU Ordinance in 2018; we are pleased to provide comments to these amendments.

Protection of Historic Resources

Potential Historic Districts. Noticeably absent in this section (pgs. 11&12) is any mention of our proposed Historic Districts. At the City Historic Preservation webpage, very bottom of the Historic Resources and Districts section, are the identified potential historic districts.

Draft amendments to the Historic Resources Ordinance are still at a rather early stage and sometime in the near future are expected to go back to HLC for another review; subsequent to that, the ordinance amendments will go to PC, Ordinance Committee, and Council. Within these amendments, there is a section which provides a framework and process to form a historic district. After the amendments are adopted by Council, it would be some length of time as each of the potential historic districts would go through the outlined process to be formed.

Thus, there needs to be a 4th bullet (pg. 11), so that contributing properties within these potential historic districts are also required to undergo Architectural Historian review.

Adjacency to Historic Resources. In the Ordinance (30.185.040,A.3 and 28.86.010,C), it doesn't specifically mention adjacency to historic resources, but we want to make sure that special attention is paid to (including review by the Architectural Historian) proposed ADU's adjacent to historic resources and historic districts (and properties in potential historic districts), including for compatibility.

Adjacency is included in the Interim Ordinance (pg. 11).

High Fire Hazard Area Development

Proposal to Prohibit Standard ADUs in the Foothill and Extreme Foothill High Fire Hazard Areas (proposed to be renamed to the Very High Fire Hazard Severity Zone). As presented (bottom of pg. 10), and within that context, we strongly agree with this proposal. We also strongly agree with the excerpts below (pg. 10), which excellently describe the complex wildfire environment which presents significant risk.

"The Draft CWPP confirms that the City and surrounding landscape exhibit a complex wildfire environment that presents a significant wildfire risk due to steep and varied terrain, a mosaic of different vegetation types, and a Wildland-Urban Interface development pattern. The draft CWPP modeled potential fire behavior in the City under extreme wind and weather conditions, consistent with conditions experienced during a Sundowner wind event. Other wildfire hazard variables were evaluated (terrain, weather, fuels, development patterns, fire department response, structure density, etc.) to confirm and/or identify new HFHAs of the City. Furthermore, the CWPP recognizes that California faces a dramatic increase in the severity and frequency of wildfires due to climate change.

The main concern with the addition of ADUs/JADUs in fire prone neighborhoods is more people and cars needing to evacuate in an emergency situation, often on narrow, winding roads. Factors associated with evacuation, such as human behavior, population density, overloaded transportation routes, visitors, vulnerable populations, as well as the evacuation of pets and large animals, make the task of any evacuation more complex. Any combination of these factors may significantly increase the amount of time it takes to execute an evacuation."

Fire is our #1 hazard! This area-wide approach to the Foothill and Extreme Foothill High Fire Hazard Areas is appreciated.

Coastal Interior and Coastal High Fire Hazard Areas. We have concerns as there are some very steep slopes, areas of dense vegetation, and some very narrow roads and evacuation issues.

Development Standards. We strongly support the standards (pg. 11). Yet, we are very concerned that often, required defensible space is not maintained. Is there a solution for this?

Solar Access

The chart (pg. 7) describes maximum height for RS and R2 zones. Our recommendation is to retain the maximum height (14' 3") of our current ordinance (except for Special ADUs); The current zoning is more protective of adjacent neighbors and their solar rights.

We appreciate your careful consideration of our comments on these important issues.

Sincerely,
Allied Neighborhoods Association

Cc: Rosie Dyste, Renee Brooke, Rebecca Bjork, Ariel Calonne, Paul Casey