

March 23, 2021

Ali Giudice
City of San Rafael - Planning Division
1400 Fifth Ave
San Rafael, CA. 94901

RE: ADU Ordinance, agenda item 2.

Thank you for considering the following comments and suggested changes/additions to the draft ADU ordinance:

1. Recommend adding/modifying definitions in SRMC for the following:
 - a. Efficiency unit – add definition to SRMC 14.03.030
 - b. Kitchen – the SRMC contains 3 separate references to the definition of a kitchen, in 12.200.020, 12.255.020, and 14.03.030. I would suggest maintaining only one definition, preferably in Chapter 14, to avoid confusion.
 - c. Travel lane
2. TABLE 14.16.285:
 - a) Lot Coverage Limits, add:
Lot Coverage for Attached and Detached ADUs may be limited on Hillside.
See C.1.c.3. Hillside residential development standards.
 - b) Under Maximum Height, add Note (E) as follows:
(E) Avoid new structures located within one hundred (100) vertical feet of a ridgeline.
3. C.1.c. Objective Design Standards, add:
 - (3) Hillside residential development standards. On lots with an average slope of twenty-five percent (25%) or greater or with a general plan land use designation of hillside resource residential or hillside residential, the standards of Chapter 14.12, Hillside Development Overlay district and the Hillside Residential Design Guidelines manual shall apply.
4. To discourage ADUs being used as short-term rentals, e.g. AirBnB, VRBO, etc, additional wording should be added. C.1.d. General Standards, add underlined:
 - (2) Rental. An accessory dwelling unit may be rented but shall not be sold or otherwise conveyed separately from the primary dwelling. The rental term of all or a portion of the accessory dwelling unit or the existing primary residence must be 30 days or more with consecutive tenancy. See SRMC 10.110.020 for enforcement actions.

5. C.1. d. (3) iii. a) – for public safety, add underlined wording:

“The accessory dwelling unit is located within one-half mile walking distance of public transit and a continuous sidewalk exists between the ADU and the public transit stop.”

6. Add wording to C.2.a.:

iii. Proposed structure is located within one hundred (100) vertical feet of a ridgeline.

7. Section F: Provide the list of prohibited streets on the City website, included in an updated ADU handout.

8. Wasn't able to identify proposed changes to 14.25.040 Improvements subject to review. Section B. was eliminated, was that intentional? It would be helpful to hi-light proposed changes.

Sincerely,

Victoria DeWitt

West End neighborhood resident