

Nicolina Hernandez
Planning Commissioner for District 6
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April 21, 2021

Dear Ms. Hernandez-

As the Planning and Design Commissioner representing District 6, we urge you to oppose the below listed provisions in the revised Accessory Dwelling Unit (ADU) ordinance that the Commission will hear this Thursday, April 22. These changes will not create more affordable housing or diversify neighborhoods.

Please vote against these changes:

1. The 150% increase from 800 to 1200 square feet in detached ADU size that is exempt from lot coverage.
2. The increase in maximum floor area for an attached ADU from the greater of 50% of the primary unit or 800/1000 sq. ft. to the greater of 50% or 1200 sq. ft.
3. The reduction in setback from 4 to 0-3 feet.
4. Continuing the parking exemption for ADUs. (State law allows for requiring one parking space but Sacramento had no requirement for onsite parking in its interim ordinance.)

We would like to see the revised ordinance continue to reflect State law that mandated ADUs by right. This means that:

1. No more than 800 sq. ft. of detached ADUs are exempt from lot coverage requirements.
2. The maximum floor area is the great of 50% of the primary unit or 800 sq. ft. (1 or less bedrooms) or 1000 sq. ft. (2 or more bedrooms).
3. All side and rear yard setbacks must be at least four feet.
4. Require one onsite parking space per ADU.

Any deviations in setback, lot coverage or other requirements should be decided at public hearings by the Planning Commission and City Council.

While State law has mandated that every residential parcel can have at least two ADUs, these were intended to be small units. Increasing the size and footprint of an ADU from 800 to 1200 sq. ft. is making these "accessory" units larger than most of the existing primary units in our neighborhood.

Many houses in Sacramento's existing neighborhoods are less than 1200 sq. ft., so this proposal basically allows a detached second full unit, which could be a three bedroom house with no parking.

A small ADU could be built by a homeowner and potentially rented below market. However, a larger unit, such as the 1200 sq. ft. units proposed, would likely be done by a developer and likely rented at market rate.

This draft ordinance will reduce open space between existing houses and increase density in existing neighborhoods. Reducing setbacks to 0 because the unit is at the back of a lot ignores the impact on adjacent lots including reducing privacy and blocking light. This proposed ordinance would allow a 35 ft. high structure of which the first floor would be at the lot line and additional floors set back only three feet.

ADUs can exacerbate parking issues in existing neighborhoods. It is not necessary to deviate from the State parking parameters for ADUs.

The city staff report states one of the goals to "promote[s] residential infill in the City's existing neighborhoods". Typically infill is considered building on vacant lots but now the city is looking at all single family lots as "underutilized" unless they have additional units. We take exception to this reasoning as it delegitimizes our neighborhood and other neighborhoods where a majority of lots have had single family construction for decades. Many or most of those who live in a moderate density neighborhood like ours have deliberately chosen to do so and their homes and yards are not "underutilized".

Clearly City planners are using the same justification for increasing the size of ADUs exempt from lot coverage as they are using to promote upzoning of single family neighborhoods to allow for up to six units. We disagree with this densification of existing neighborhoods as explained in our [December 2020 letter](#) to Councilmember Guerra.

Sincerely,
Elmhurst Neighborhood Association Board