



427 Mendocino Ave
Suite 100
Santa Rosa, CA 95401

(707) 900-4364
info@generationhousing.org

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Sebastopol City Council
7120 Bodega Avenue
Sebastopol, CA 95472

RE: 6th Cycle draft Housing Element

Dear Mayor Slayter, Councilmembers, and staff:

Generation Housing is leading the movement to increase the supply, affordability, and diversity of homes throughout Sonoma County. We champion effective policy, sustainable funding resources, and collaborative efforts to create an equitable, healthy, and resilient community for everyone. Baked firmly into that mission is the endeavor to reduce Vehicle Miles Traveled (VMT), Affirmatively Further Fair Housing (AFFH), and enhance long-term economic vitality for Sonoma County as a whole.

After reviewing the 6th Cycle draft Housing Element for the City of Sebastopol, we would like to submit comments that we believe should be considered in advance of the draft being remitted to the California Department of Housing and Community Development (“HCD”).

Remove Governmental Constraints

1. Parking minimums continue to be a topline constraint to the feasibility of residential development/mixed-use development. If Sebastopol wishes to expand opportunities for gentle density within the downtown Sebastopol footprint, then more analysis needs to be conducted around the true scope of parking in the city.

As an example, I would call attention to 110-112 North Main Street. This is a single-story commercial building that was recently for sale. Under existing code, if the site was redeveloped with ground floor commercial and three floors of residential above, parking would be required on the site. The 4,000 sq ft of commercial space would require 8 parking spaces (1 space per 500 sq ft net floor area). Assuming four 1-bedroom units on each floor (total of twelve units) and the requirement for 1.5 parking spaces per unit, then that means a total of 18 parking spaces would be required for this site. Even with the downtown residential use reduction of 30 percent (which drops that to 12.6), you would still need a total of 21 parking spaces for the entire project. That’s not even remotely possible for that site, both from a financial aspect and a physical land use aspect.

That’s why we emphasize the need for the Housing Element to take aim at reducing parking standards and eliminating parking minimums. Minimum parking requirements are a major constraint on housing, especially for lower cost housing types. They can cost in excess of \$30,000 per spot and can raise rents by as much as [17%](#), and eliminating them is particularly important for

smaller & other spatially constrained sites. Consider adopting a parking maximum.

2. Requiring a use permit for residential only projects in the Office Commercial (CO) zone is a major constraint. A use permit is no guarantee of approval. By right development is much more attractive to a developer than going through the public hearing process which adds a great deal of uncertainty to the outcome of the proposal. What's more, 100% residential only projects already exist in this zoning region, so why not streamline the process and remove the use permit? Where there is not a strong demand or there is otherwise a glut of commercial space that is unused or frequently vacant, housing should be allowed by right and without the mixed-use requirement.
3. Move up the timeline for conducting a new nexus study analysis. AB 602 requires that all new nexus studies adopted after July 1, 2022 calculate a fee imposed on a housing development project proportionately to the square footage of the proposed units of the development. We request a commitment be made to running a new study before the end of 2024.
4. Ensure that the city has a ministerial process for housing permitting, especially multi-family housing, and remove impact fees for deed-restricted housing. A discretionary process for housing development creates uncertainty and adds to the cost of construction. For example, multi-family housing should not require a conditional use permit or city council approval unless the builder is asking for unique and extraordinary concessions. Right-sizing governmental constraints, entitlement processes, and impact fees will help the city successfully meet its RHNA.
5. Increase the allowable square footage for Accessory Dwelling Units ("ADUs") to 1,200 sq ft. If Sebastopol wishes to create more housing accessible to young families (the next generation), then increasing the allowed square footage of ADUs is a strong approach to maximizing land use and ensuring the long-term sustainability of the community. While it is commonplace for opposition to state this will overwhelm our neighborhood with too many people, add too many cars, and cause more pollution – we would urge the city to meaningfully revisit the requirements around sizing for ADUs and allow more flexibility on all parcels, even if that means reducing setbacks to accommodate a unit of that size on a smaller parcel.

With the value of homes in Sebastopol hovering around an average of \$1.1 million, all efforts must be made to increase the diversity of housing typologies in the city. That starts with removing and/or easing governmental constraints.

End Single-Family Zoning

Under *Program A-3.3 Missing Middle Housing* it is stated that "community input indicated strong support for missing middle housing." To achieve this goal, we recommend converting most (if not all) parcels designated R4 (single family residential) to R5 (single family and multifamily residential). Relaxing development standards such as setbacks, height restrictions, and the above-mentioned parking requirements is paramount to the successful development of "plex-style" or missing middle housing.

With the advent of SB-9, the single family only designation is already well on its way to becoming a relic of the past. Recognizing that we are trending in that direction, why not take the bold step of converting all parcels currently zoned for R4 to R5. While we understand this might require a General Plan Amendment, we strongly feel it is well worth the communities resources to take this to task and create more opportunities for the development of “plex-style” housing.

We appreciate the time invested in this process and look forward to a continued partnership in advancing our regional housing needs.

Respectfully,



Jen Klose
Executive Director, Generation Housing