

September 4, 2020 (transmitted via email to PlanningBoard@sarasotafl.gov)

Dear Members of the City of Sarasota Planning Board:

Here are the written comments from the President, Officers and Other Board Members of Arlington Park Neighborhood Association, Inc. for your review prior to the September 9, 2020 meeting at 1:30PM. We thank you for having these ten recommendations and one request read into the record during that meeting. I will be available remotely at the meeting to respond to any questions.

We, the Board of Directors of the Arlington Park Neighborhood Association, Inc., a 501(c)(3), appreciate that the City is moving forward with this first step toward getting more affordable housing into the City with increased provision of Accessory Dwelling Units. We support making ADUs permissible in Arlington Park Neighborhood.

We are excited that Arlington Park Neighborhood is one of the neighborhoods where Accessory Dwelling Units will be permitted. We look forward to our working partnership. We are distressed that all of the neighborhoods in the City are not being included, but we do not want to stop forward progress. We believe all neighborhoods deserve a chance to have ADUs. Jon Thaxton, Senior Vice President for Community Investment at Gulf Coast Community Foundation, notes “ Accessory Dwelling Units are proven nationally to be one of the most fundamental and effective forms of affordable housing. If our local governments want affordable housing, then this is a way to start it because ADUs are an effective use of existing infrastructure.”

Recommendation 1: In the long term, ADUs should be City-wide, should allow larger units, and should be more encouraging of “small homes” that will actually provide long term living spaces for more than one person, with more than one bedroom.

Technical Comment – ALL Physical setbacks and sizes should be in one place. In the ZTA, for ADOD Section VI-906 (e) (1) will now require a minimum rear yard of ten 10 feet which is less than the now required minimum of 15 feet. Recommendation 2: For clarity for all, there should be only one place in the Zoning Code where all required sizes, setbacks, and other design considerations for ADUs are included, not at least four places in the Zoning Code, as currently proposed.

Owner occupancy may not be possible when an owner is forced to go into the hospital or long-term care or to live with family members. At that time, the owner may be physically living elsewhere.

Recommendation 3: The owner occupancy requirement must be addressed so that owners that are forced to alternative living locations do not lose streams of rental income and tenants are not forced out of their permanent affordable rental home.

Recommendation 4: Newly constructed ADUs should be encouraged to be handicapped accessible via universal design solutions and also be energy efficient in alignment with Ready for 100% Renewable Energy goals.

The language “The main entrance shall not be through a garage” is confusing. Recommendation 5: This needs to be clearer and more consistent with Florida Building Code requirements.

Some older houses in Arlington Park are located to the very rear of the existing building lot. These houses could best locate an ADU in the front yard, preferably with a front porch catty-corner to the main dwelling. This would create an L configuration of primary home and ADU. Unfortunately, the following existing provision precludes a front yard ADU: Division 6 – Additional Use and Development Standards, Sec. VII-602, (cc) Accessory dwelling units. (3) Design standards. e. Additional requirements for detached accessory dwelling units. Detached accessory dwelling units must meet the following: 1. Setbacks. The accessory dwelling must be located at least six feet behind the principal dwelling building. Recommendation 6: Delete this “setback six feet behind the principal dwelling” requirement.

According to Table Vi-203, Residential Development Standards in the Single Family Zone, the maximum building coverage for a single family lot in the RSF-E and the RSF-1 to RSF-4 zones is 30% to 35%. That means that “additional living space” could be added to a single-family house on a 10,000 square foot to create a total of 3000 or 3500 square feet of building footprint. In some cases, because of antiquated plats, existing single family lots are actually close to 14,000 square feet, allowing only one single family home, that may be closer to 1400 square feet in size, or 10% building coverage. Recommendation 7: The Size of an ADU should be related to the lot and parcel size, i.e., larger lots should be allowed larger ADUs than 600 square feet. (Note, small lots will already be restricted to smaller than 600 square feet ADUs if they have inadequate maximum building coverage available.)

City’s recommended maximum size of 600 square feet for ADUs is not consistent with the recommendations of the two sources cited; actual recommendations of sources cited are for maximum of 650 square feet (Local Affordable Housing Advisory Committee) and 800 square feet (Blueprint for Workforce Housing). Thus the document’s language on page 15, last paragraph, that this ZTA corresponds with the recommendations of the cited guiding documents is not true. (Note: Sarasota County used the Blueprint for Workforce Housing guidance to reach a 750 square feet size for Accessory Dwelling Units.) Recommendation 8: The City should consider a larger size for ADUs than 600 square feet, consistent with the recommendations of the respected, cited sources.

In Article II- 201 Definitions, under II-304 (b), “household living is characterized by residential occupancy of a dwelling unit by a family. Tenancy is arranged for periods longer than one week.” With this definition in mind, ADUs should be considered small homes, suitable for family household living. Instead, on page 14 of the document, the staff report notes: “ the ADU is... to provide housing for a senior or young professional.” And the report then opines that larger units may reduce affordability and two or three bedroom units would ultimately increase the overall density. The whole point of an ADU is to increase affordable small homes for people (including small families) who need housing. The Florida Building Code Sixth Edition has minimum sizes for Single Family Dwellings (tiny homes) (document attached) that include a minimum of 70 square feet for habitable space; the proposed restriction of only one bedroom in City ADUs limits the quality of life for small family units that may live in an accessory dwelling unit. Within 600 square feet, more than one bedroom sized of at least 70 square feet would be appropriate for say a single mother and child, or two college students or two elderly people. Recommendation 9: The City should not limit the number of bedrooms to ONE inside of an ADU.

It has taken literally two years for City Staff to move forward with the required code language to add ADUs for three neighborhoods, and we don't know how or why these particular neighborhoods were selected. Recommendation 10: The "Opt In" Provision in the City Plan for adding ADUs for other neighborhoods needs an immediate form and formal process so that other neighborhoods will know exactly what is necessary and how to make ADUs also permissible in their neighborhoods.

And finally, we have one additional APNA request:

When the public has only 5 minutes at the Planning Board or 3 minutes at the City Commission meetings, it is often too little and too late for public comment to be meaningful acted upon. Many cities and counties include neighborhood planning as the most important, basic building block of the planning process. The neighborhood planning process is always, most importantly, built upon strong community participation. APNA hungers for the City to have more neighborhood planning and more meaningful community input. We request that the City of Sarasota identify and adopt a clear process that encourages formal citizen public input into any zoning text amendments, one that is open, meaningful and timely that is held prior to Planning Board consideration.

Thank you for allowing us to submit our recommendations and our request.

In community,

Mary Anne Bowie, FAICP President, Arlington Park Neighborhood Association, Inc. and Kim Pitts –Vice President, Elaine Silver - Treasurer, Lorrie Muldowney - Secretary, Terry Langlois, DeeAnna Dowdle, Julia Clark, Members of the Board of Directors

New website: APNASrq.org