AGUA DULCE TOWN COUNCIL

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February 27, 2023

Mr. Cameron Robertson Department of Regional Planning 320 West Temple Street Los Angeles, CA 90012

Via Email to: design@planning.lacounty.gov CRobertson@planning.lacounty.gov

RE: **Comments on the Draft Residential Design Standards Ordinance**

Dear Mr. Robertson:

The Agua Dulce Town Council (The Council) appreciates the opportunity to submit comments on the Department of Regional Planning's Draft Residential Design Standards Ordinance. We understand the intent of the draft ordinance is to "ensure that residential development is designed to foster walkable, livable, and healthy neighborhoods that enhance the comfort of residents and the experience of the public. The desired outcome of implementing these standards is to design sites that inspire active lifestyles by making it easier for residents to walk and bike to and from their homes; provide direct pedestrian and bicycle connections to the adjoining rights-of-way, including sidewalks, trails, etc. and within and around the development; and encourage pedestrian and other forms of non-vehicular mobility/activity for users of all ages and abilities by ensuring pathways are spacious, well-maintained, accessible, and safe,"

While we understand the desired outcome, we question whether these standards are compatible and harmonious with rural communities. There are distinct differences among urban, suburban and rural communities. Some of those differences include infrastructure, services, traffic circulation, mass transit, multi-use trails, density of development, and the type of physical environment. By having these standards apply to ALL development in Los Angeles County, we question whether rural areas are merely areas waiting to be urbanized or if the rural landscape needs preservation. The Rural Outdoor Lighting District standards are referred to within the Ordinance. The fact that that is included indicates there are clearly understood differences between urban and rural elements.

We appreciate that the draft ordinance does indicate if a project is in a Community Standards District (CSD) that those standards will apply instead. Agua Dulce has a Community Standards District that was established to: "Maintain a dispersed, low-density development pattern to preserve the secluded rural nature of the community; protect the equestrian, agricultural, historical, cultural, archaeological, and geologic characters of the community; protect sensitive resources and areas, including the Vasquez Rocks Natural Area Park, the Santa Clara River, the Angeles National Forest, and the various floodplains, hillsides, ridgelines, rock outcroppings, and the significant ecological areas within the CSD; maintain and

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enhance the pedestrian and equestrian trail system within the CSD, including the Pacific Crest Trail; and minimize the development of urban infrastructure that would alter the rural character of the community, including the development of sewer and water systems, paved streets, street lights, concrete sidewalks, and concrete flood control systems." The draft ordinance does state that if a standard is not included within the CSD, the draft residential design ordinance will apply. The Council has comments and concerns on some of those standards that are not addressed in the Agua Dulce CSD and we outline them below:

Section 18, 22.140.520 F. 3. b. i. and ii.: Pedestrian Pathway Access, Sidewalks

Please verify the meaning of "direct pedestrian access", "primary street sidewalk", "sidewalk" "walkways", and "vehicle driveway." Are these paths paved, impervious, permeable or native soil surfaces? There is an exception to Pearblossom Highway. Please explain that exception and why other highways, such as Sierra Highway are not exempted. What are the sidewalk requirements for "flag lots"?

As many of the residences in Agua Dulce have horses and they trail ride directly from their properties, multi-use trail access may be appropriate to connect with a side yard or barn area as opposed to the building entrance. Will this rural accommodation be included?

Section 18, 22.140.520 F. 5.: Building Articulation

The intent of this section is to ensure the design of a residential development is considerate of its surroundings in all directions by breaking up large featureless spaces on all building facades with architectural detailing and modulations. The Council wants to make sure that classic California ranch-style home design and building details are allowed.

Section 18, 22.140.520 F. 6.: Building Façade Details

The intent of this section is to ensure buildings are designed holistically on all sides to create a cohesive architectural idea and enhance the surrounding neighborhood in all directions by considering the use of materials for all sides of a building equally, not just the frontage. As stated above, the Council wants to make sure that classic California ranch-style home design and building details are allowed.

Section 18, 22.140.520 F. 7.: Landscaping, Walls, Fences, and Screening

The intent of this section is to ensure developments utilize landscaping, walls, and fences that are designed to be in harmony with adjacent lower-intensity/smaller scale uses, soften the appearance of large massing along the street, allow both for privacy and visibility, and increase a development's resiliency to wildfire, heat, drought, and floods.

- **Trees and Plants:** The ordinance requires a minimum of 20 percent of the lot area shall be landscaped. This doesn't specify if the landscaping is new planting or uses existing landscape elements to be included in the calculation. Based on a 20 percent coverage, on a five acre property that is typical of the Agua Dulce community, 1 full acre would need to be fully landscaped.
- Walls and Fences: The section related to Walls and Fences does not differentiate between perimeter fencing and internal fencing use for livestock and domestic animals. The Ordinance prohibits chain-link, barbed wire, and electric fencing. Chain-link fencing is an economical and effective way to fence the property perimeter. It comes in a variety of different gauges and color coatings. Chain-link is see-through, offering good visibility for the property owner to see what is on the other side of exterior perimeter. Many secure dog runs and other domestic animal enclosures are made of chain-link. Barbed wire and electric fences are widely used in rural communities for securing livestock. Both of those methods of fencing are used to keep the animals secure and to keep predatory animals away from livestock. Chain link fencing also withstands the strong Santa Ana winds that are common to our community and is fire resistant, ensuring that property boundaries remain intact after windstorms and wildfires. The Council opposes the prohibition of chain-link, barbed wire, and electric fencing for rural communities.
- Screening: The section related to Screening indicates trash enclosures and all mechanical equipment and utilities must be screen from view from the street. Rural properties have a number of different types of mechanical equipment related to this section. Trash dumpsters for livestock manure disposal, water storage tanks, propane tanks, and generators are all rural types

of equipment that need to have access for service. The Council opposes the requirement that all trash enclosures and all mechanical equipment and utilities be screened for rural communities. Consideration also needs to be given to materials used for screening that increases the risk of flammability around critical equipment like propane tanks in a designated high fire hazard severity zone.

The Council respectfully asks that within the proposed Residential Design Ordinance that rural communities are acknowledged and have specific design standards that are suited to their environment. We want to ensure that any development with urban influence would not alter the rural character of our community. This is yet another example of "one size does not fit all" when designing Countywide Ordinances for a large metropolitan area that includes urban, suburban, and rural communities within Los Angeles County. The Rural Outdoor Lighting District takes this into account, and we are asking that something similar be considered. Additionally, we are requesting community engagement in the process going forward. We invite you to present the proposed project at a future Agua Dulce Town Council meeting so there can be effective dialogue with Regional Planning staff and the rural community members. Our meetings are held on the second Wednesday of each month. The Community Meeting begins at 7:00 P.M. and is open to the public. The Council will continue with virtual Zoom meetings and have an in-person meeting once every quarter. Those in-person meetings will be March, June, September, and December at the Agua Dulce Women's Club, 33201 Agua Dulce Canyon Road, Agua Dulce. Virtual meetings will be via Zoom in Apr, May, July, Oct, and Nov. There is no Council meeting in August. Based on public participation at in-person meetings, we may revisit and amend this schedule and format.

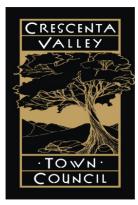
We ask that you carefully review our comments. We look forward to additional community engagement in shaping the future of Residential Design Standards.

Respectfully,

Don Henry

Don Henry, President Agua Dulce Town Council – 2023

cc: Ms. Stephanie English, 5th District Deputy <u>SEnglish@bos.lacounty.gov</u> Anish Saraiya, 5th District Planning and Public Infrastructure Deputy <u>ASaraiya@bos.lacounty.gov</u>



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CRESCENTA VALLEY TOWN COUNCIL

February 21, 2023

LA County Department of Regional Planning 320 W Temple Street Los Angeles, CA 90012

RE: Project No. PRJ2021-003654-(1-5) Draft Residential Design Standards Ordinance

In response to the Department of Regional Planning's request for feedback on the proposed Draft Residential Design Standards Ordinance, the Crescenta Valley Town Council Land Use Committee met to review the proposed changes.

On February 02, 2023 the LUC passed a motion which is hereby attached to this letter. CVTC is against the County's proposed Draft Ordinance and has unanimously approved the recommendation of the LUC.

Thank you for your continued hard work to ensure that we have input on behalf of our community.

Chris Kilpatrick President

Kerri Bräutigan

Kerri Bräutigam Corresponding Secretary

Harry Leon Vice President

"A Community that Cares"

Motion passed at the LUC Committee meeting held on February 2, 2023.

After reviewing the **proposed Draft Residential Design Standards Ordinance**, the LUC's recommendation to the CVTC is as follows:

The proposed Draft Residential Design Standards Ordinance does not reflect the needs of our community. The proposed standards are overly complicated, difficult to understand and almost impossible to design a project that will conform. Good design addresses the particular nuances of every site, those challenges are solved thru good thoughtful design, not a set of rules to be reviewed by an entity that is totally unfamiliar with the actual community and property.

The current process for Site Plan review in the county has been backlogged for several years now. The review currently takes between 6-8 months. If these standards are implemented, we can only imagine that the design review would take up to a year to complete. After that review then the applicant will have to go through Plan Check which is another process all together. This is what an applicant has to go through to get a building permit in our community, and all other Unincorporated Areas within the LA County:

- 1. Site Plan review submittal
 - a. Prepare submittal package drawings and documents
 - b. Possible land survey required.
 - c. Possible geology report required.
- 2. If there is an oak tree on the property you have to do an Oak Tree submittal and possible Public Hearing.
 - a. Possible arborist report required.
- 3. Compliance with a local CSD.
- 4. Plan check submittal
 - a. Prepare construction documents- Contractor or Architect
 - b. Possibly a Structural Engineer
 - c. An Engineer to do the Title 24 calculations.
- 5. Drainage review and submittal
- 6. Grading review and submittal (If needed)
 - a. A landscape irrigation plan and possibly contracting a Landscape Architect.
- 7. Fuel modification plan and submittal to the fire department
- 8. Fire sprinkler plan and submittal to a different division of the fire department
- 9. Solar plan and submittal
- 10. Street dedication and right of way approval
- 11. Water and sewer availability permit and approval
- 12. If on a septic system, on site location thru drilling for 100% replacement of septic system in the future.
- 13. If there is any demolition you must get AQMD approval and permits
- 14. Construction and Demolition Debris Recycling and Reuse Plan Approval
- 15. Library Fee submittal and approval
- 16. School fee.

All of these plans get submitted to different divisions in the County of LA. The system is already overly complicated. Having a Design Standards Ordinance that would require a review will add another year to already difficult process. This added review would definitely curtail future housing projects; not to mention that these reviews most likely would end up in a public hearing if the project is big enough. This all results in unreasonable time & unreasonable costs contributing to the housing shortage crisis.

Respectfully submitted, Land Use Committee for CVTC

From:	Acton Town Council
То:	DRP Residential Design Standards; Acton Town Council
Subject:	questions regarding proposed residential design standards
Date:	Thursday, January 26, 2023 8:59:09 PM

CAUTION: External Email. Proceed Responsibly.

Kindly clarify the following:

Given that the intent of the proposed standards is to enhance the walkable environment along public streets and in residential neighborhoods by ensuring that pedestrians, cyclists, and other non-motorists are provided with safe and pleasant access to residential buildings, will the standards still apply if a home is not on a public street?

Please define the term "clear pedestrian pathway" as it is contemplated in item (b)(i) on page 20 of the draft ordinance.

Please define the term "surface lot" as it is contemplated on page 31 of the draft ordinance

Please provide an image of, and identify a source for:

- stucco with a sand finish of 20/20.
- stucco with a sand finish less than 20/20
- stucco with a sand finish greater than 20/20.

Is stucco with a sand finish of 20/30 considered to be less than the 20/20 threshold established on page 29? or is it greater than the 20/20 threshold?

Please confirm that, to comply with the "Landscaping, Walls, Fences, and Screening" requirements described on pages 29-30, a property owner who wants to build a home on a 5 acre parcel in Acton will be required to provide at least an acre of landscaping.

Please confirm that, under the restrictions imposed on page 30, chain link fencing will not be permitted on agriculturally zoned parcels that are developed with a single family home in Acton and, if true, please identify economical alternatives to chain link which comply with the restrictions imposed on page 30 and effectively protect animals, livestock, and pets from coyotes, mountain lions, and other predators.

Thank you for your assistance in clarifying these matters

Regards The Acton Town Council



February 27, 2023

The Los Angeles County Dept. of Regional Planning 320 West Temple Street, 13th Floor Los Angeles, CA 90012 Electronic Transmission of seven (7) pages to: <u>design@planning.lacounty.gov</u>

Subject: Draft Residential Design Standards Ordinance

Reference: Announcement Issued by the Department of Regional Planning on January 26, 2023 that the Draft Residential Design Standards Ordinance is Now Available for Public Comment and Review.

The Acton Town Council respectfully submits the following comments on the "Draft Residential Design Standards Ordinance" ("Ordinance").

The Acton Town Council understands that the Ordinance is intended to ensure that "development is designed to foster walkable, livable, and healthy neighborhoods that enhance the comfort of residents and the experience of the public". However, and unfortunately, the Ordinance appears to be yet another "one size fits all" effort in which the County "force fits" every unincorporated community into the same set of standards without regard for community context or even practicality limitations. It is clear from the very first page that the Ordinance is entirely "urban-centric" and that its purpose is to address aesthetic concerns that exist only in urban areas. For instance, Figures 22.140.520 A-D depict high density urban residential developments with little open space, paved streets, curbs, gutters, sidewalks and setbacks of only 5-20 feet; these are not the circumstances that exist in rural communities like Acton where 80% of every residential parcel is open space and where requisite 50 foot setback distances maintain a significant separation between pedestrians and residences.

Though the Ordinance only addresses aesthetic concerns that exist in urban areas where overcrowded residential developments are compressed tightly against roadways and walkways, it will nonetheless be inflicted on rural communities and add even more costly and burdensome layers of bureaucracy onto the homebuilding process; it will also also further impede rural development and contribute to the decay of rural communities. For instance, the Ordinance's "stucco standard" which prohibits a "sand finish of less than 20/20" will apply to residential projects in Acton even though the 50 foot minimum setback distance will make it *impossible to discern whether a "16/20"* stucco was used or a "20/30" stucco was used¹. It is noted that smooth stucco finishes (like "20/30" and "Santa Barbara") are high end and expensive to apply; given that the Ordinance appears to prohibit the use of "industry standard" 16/20 stucco in rural areas where pedestrians are too far away to even notice whether a 16/20 stucco is used, one can only conclude that the "stucco standard" imposed by the Ordinance will drive up the price of construction without making any difference to the "pedestrian experience". This will be particularly problematic in Acton and other communities within very high fire hazard severity zones because stucco is the most commonly used construction material to comply with local fire codes; requiring property owners to put in an expensive and high-end stucco finish will add unnecessary costs and drive home ownership further out of reach. Finally, the requirement that rural residents install expensive, high end stucco finishes is completely impractical; there are few contractors available that have the skill required to properly apply "smooth finish" stucco, and Acton residents have, in the past, had great difficulty finding and hiring such experts. It would be silly for the County to deny a building permit simply because a property owner cannot find a contractor with sufficient expertise in applying "smooth finish" stucco.

The "stucco standard" is merely one of several Ordinance provisions that have no place in rural communities. For example, the Ordinance prohibits "chain link", wired, and electric fencing; this prohibition is unacceptable. Chain link, wired, and electrified fencing provide the only reasonable means of protecting agricultural animals from mountain lions, coyotes, bobcats, and other predators; furthermore, the alternatives recommended by the Ordinance are either contrary to adopted community standards districts (such as the "masonry" recommendation) or they are infeasible (such as the "glass wall" recommendation) or they provide no protection at all (such as the "wood fence" recommendation). The fencing prohibition included in the Ordinance displays a singular lack of understanding of what is appropriate for rural agricultural areas.

Another aspect of the Ordinance which displays a lack of understanding of rural residential development patterns is found in the "Building Articulation" Section [22.140.520(F)(6)¹] which is supposed to "ensure that the design of a residential development is considerate of its surroundings in all directions by breaking up large, otherwise featureless spaces, masses, or volumes on all building façades with

¹ Incidentally, according to the stucco companies contacted by the Acton Town Council, 16/20 stucco is the industry standard, and while they all produce 16/20, 20/30, and 30/30 stucco materials, we found no stucco companies that sell a 20/20 stucco; so, the "20/20" standard established by the Ordinance does not make sense.

architectural detailing and modulations". Notably, rural residential development is always low density and is therefore never characterized by "large, otherwise featureless spaces, masses, or volumes"; it is also already "considerate of its surroundings in all directions" because rural residential neighborhoods are mostly open space. In fact, the maximum impervious finished surface area for rural residential lots in Acton is only 21 percent; this means that rural residential lots in Acton are almost entirely empty! Imposing the "Building Articulation" requirements of the Ordinance on rural lands is **pointless** because rural lands do not suffer from the defects that the "Building Articulation" section purports to cure. Furthermore, if this Ordinance is inflicted on rural lands in Acton, it will add yet another costly and burdensome layer of bureaucracy on top of the already stifling development restrictions that exist in Acton; as such, it will further impede rural development and contribute to the decay of rural communities.

Another aspect of the Ordinance which displays a complete lack of understanding of rural residential development patterns is found in the "Building and Site Access" Section [22.140.520(F)(3)] which is intended to "enhance the walkable environment along public streets and in residential neighborhoods by ensuring that pedestrians, cyclists, and other non-motorists are provided with safe and pleasant access to residential buildings." The requirement that "All buildings shall have a minimum of one direct pedestrian pathway from the adjoining primary street sidewalk (or public-right-of-way where sidewalks are not present) to the front entrance of the building" is completely unacceptable; rural residents should never be forced to provide pedestrian access to the buildings on their property. Rural residences support many uses, including animal rescues (dog, horse, big cat, etc.), animal training (equestrian, working dogs, etc.), and agricultural uses (crops, sheep, chickens, alpacas, etc.) most of which are closed to the public and all of which should remain permanently inaccessible to street pedestrians because they involve special facilities and equipment and require a high level of expertise. Thus, for reasons of safety and security, pedestrian access from the street should **never** be established for structures or lands that support these uses. It would be completely inappropriate for the County to adopt any Ordinance which requires rural residents to make pedestrians feel welcome to access the buildings and structures that support their animal and agricultural uses. It is not merely a matter of courtesy; it is also a matter of safety. For instance, it is known with certainty that Shambala rescue does not want pedestrians to feel welcome to walk in off the street and visit their lion or other big cat facilities; similarly, the Wolf Rescue does not want pedestrians to feel welcome to just stroll in and visit their wolf facilities. The mandatory pedestrian access provisions in the Ordinance which require rural residents to provide pedestrian pathways from the street to the buildings on their property is entirely unacceptable.

Page 20 of the Ordinance requires tree planting for every 40 linear feet of lot frontage; lots are exempted if the requirement conflicts with fuel modification requirements or if they are in a hillside management area or if they front a limited secondary highway or parkway where no sidewalks or curbs and gutters are required. The "parkway" exemption does not make sense. Section 21.24.065 of the County Code establishes that "Parkways" always have curb and gutter and they are always a minimum of 80 feet wide; this means that they are at least as large as (if not larger than) secondary highways and thus should not be exempted. Furthermore, the exemptions established by this provision of the Ordinance must be expanded to include residential development that fronts on unimproved roads; it also must exempt all rural communities where curb, gutter, and sidewalk infrastructure are expressly and substantially discouraged by adopted planning documents such as the Antelope Valley Area Plan.

The intent of the "Ground Floor Treatment" requirements is to "ensure that primary entryways to a building are oriented toward the public right-of-way to encourage pedestrian activity to and from the building." However, "pedestrian activity to and from a building" in rural residential areas must be substantially discouraged for safety and security reasons (as discussed above). The "Ground Floor Treatment" section should be revised to reflect this fact.

Pages 24-27 of the Ordinance presents a litany of architectural features which will make a difference in the appearance of residences in urban areas where setback distances are quite small (as little as 5 feet). However, many of the architectural features that are listed will not be particularly discernable at the 50 foot setback distance that is established for rural residential parcels so it is not clear that they should be imposed as a requirement.

The "Landscaping, Walls, Fences, and Screening" Section requires full landscaping on at least 20% of the lot area that is not used for buildings; landscaping must consist of "a combination of trees, ground cover, shrubbery, planters, or flowers." This requirement has no place in rural residential areas. The notion that a property owner must landscape an acre of land just to be allowed to build a home on a 5 acre lot is simply untenable; it is rendered more so by the fact that most rural residences in the County are in the desert where water is scarce and local well yields are limited. Furthermore, communities like Acton are striving to preserve and maintain native vegetation, so any Ordinance which calls for the elimination of 20% of the native vegetation on a parcel merely for the purpose of replacing it with "a combination of trees, ground cover, shrubbery, planters, or flowers" is reckless and completely unacceptable. In short, property owners should *never* be forced to remove 20% of their native vegetation or extract more groundwater to create and maintain mandatory landscaping that is merely intended to improve "pedestrian experience".

Page 29 of the Ordinance requires all buildings to comply with "the requirements of Section 110.10 Mandatory Requirements for Solar Ready Buildings of the California Building Energy Efficiency Standards". This does not go far enough. The Ordinance must require all new residential buildings to install onsite solar facilities and not just merely be "solar ready".

Page 29 of the Ordinance addresses "Vehicle Parking Facilities" and imposes orientation and other requirements on residential parking areas. It provides exemptions for lots located in hillside management areas, but fails to recognize that other factors should also warrant exemptions. For instance, in rural areas, geologic and drainage hazards can dictate the location and orientation of both homes and parking facilities. Similarly, the location of a residential well and/or the placement of a septic system also dictates the location and orientation of both homes and parking facilities. All of these things must be factored into the design of a rural residential property; therefore, the Ordinance must accommodate these features by including them as factors for which the Ordinance will permit exemptions to the various orientation and placement provisions that it imposes. Furthermore, the locational restrictions and placement provisions imposed by Figure 22.140.520 A – MM seem rather untoward when they are applied to rural residential lots that are typically 125 feet wide or wider. Finally, it is not certain that the vehicle parking provisions and other location restrictions that are imposed by the Ordinance will accommodate the movement and storage of horse trailers, hay trucks, and other large vehicles that are commonly found in rural residential areas; accordingly, the County should conduct a study to make sure that the parking requirements imposed by the Ordinance are actually viable in rural agricultural areas.

It is noted that the Ordinance exempts mobilehomes and manufactured homes from the "Building Articulation", "Building Façade Details", and "Balconies and Patios" sections of the design standards (see page 17). This does not go far enough. Many rural residences install inexpensive structures (i.e., barns) to house their agricultural equipment and uses; these structures are constructed from pre-engineered and pre-fabricated components that can never comply with the "Building Articulation", "Building Façade Details", and "Balconies and Patios" sections of the design standards. Therefore, pre-engineered accessory structures should also be exempted from the Ordinance's design standards.

The Ordinance also has a number of typographical errors. For instance, page 18 refers to Table 22.140.520 and states "All residential development is categorized into one of four building types as defined in Table 22.140.520" – the problem is, Table 22.140.520 only identifies three building types, not four. Additionally, page 20 states "Intent. The intent of this Subsection is to ensure that primary entryways to a building are oriented toward the public right-of-way to encourage pedestrian activity to and from the building. for more details. On corner lots.... "; there is a non-sequitur in the middle of this paragraph which makes no sense. Additionally, there is a numbering error in Section 22.140.520 (F). Specifically, section 4 on page 20 addresses "Front Yards and Building Orientation", Section 5 on page 24 addresses "Ground Floor Treatments", and Section 5 on page 26 addresses "Building Articulation". The latter section on "Building Façade Details", "Landscaping, Walls, Fences, and Screening", etc.) should be renumbered accordingly.

Though several hours have already been expended to review the ordinance and prepare this letter, only half of the Ordinance has been reviewed and we have no more time to devote to this matter because there are other equally pressing issues that also merit our attention. It is always burdensome to plod through a lengthy draft Ordinance that will materially impede development and yet not find one single provision that will enhance our community or improve the "rural experience"; it is also clear that the Ordinance was drafted without our input and that it will create only problems for our community, not solutions. More importantly, the Ordinance fails to address extant impediments to "active lifestyles" and "active uses" within rural communities like Acton, so it will not provide "active lifestyle" benefits to Acton or other rural areas.

The Acton Town Council believes that the gap between what the Ordinance provides and what we need as a community to promote an "active lifestyle" is too wide to be reconciled; the Ordinance is entirely "urban centric" and therefore wholly inapplicable to the "rural form". As such, we have concluded that rural residential neighborhoods should be entirely exempted from the ordinance, and we recommend that the Ordinance be revised as follows:

22.140.520 - Residential Design Standards

A. Intent. This Section prescribes standards that ensure that residential

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B. Applicability. All residential development projects that are not located on "Rural Lands", including projects that are wholly new or that propose additions to existing structures, shall comply with all applicable standards in this Section.

If the County elects to not incorporate this revision, then a new effort must be undertaken by Department of Regional Planning staff to identify the characteristics of rural residential developments which either impede the fostering of walkable, livable, and healthy neighborhoods or reduce the comfort of residents or impair the experience of the public. This will necessarily require staff to visit rural communities like Acton and observe local residential neighborhoods "first hand". And, if such observations reveal deficiencies, then Acton Town Council members will be happy to work with staff to develop appropriate language that is specifically applicable to the "rural form"; this language can be added to the Ordinance along with other language which exempts rural residential properties from all of the "urban-centric" provisions that the Ordinance contains.

Sincerely;

Jeremiah Owen, President

The Acton Town Council