

To: Planning Commissioners of the City of Merced

December 6, 2020

From : Michael Belluomini

Ref: Tentative Subdivision Map #1315

Proposed subdivision #1315 at the northwest corner of 'G' St. and Mission Ave is using the City Zoning Code provision that allows unusually small lots to provide more houses which hopefully are affordable while increasing the developers profit. Under standard R-1 zoning this 7.78 acre site would yield 40 house lots instead of 70 lots. Recognizing the dangers of increasing housing density without careful planning the City requires a Conditional Use Permit (CUP) for such small lot subdivisions. A CUP gives you, the Planning Commission, broad discretion to change the subdivision design to ensure a safe, enjoyable, well functioning, attractive and healthy neighborhood.

The design of the proposed subdivision violates general plan policy SD-3.1.d regarding maximizing ""passive" solar design, such as large south-facing windows for winter heat gains and overhangs and shading for summer heat protection." And policy 3.1.b "Require all new subdivisions to maximize, to the extent feasible, proper orientation of lots with regards to solar utilization" .The subdivision as proposed has 53 lots facing west or east and only 17 facing south or north. This means 53 houses will have the afternoon sun pouring through the front or rear windows requiring residents to draw the curtains much of the time and be denied a view of the out of doors. It means that these 53 houses will have large heat gain for months requiring the use of more air conditioning than houses facing south or north. The subdivision is already dense and this design makes it unhealthy, expensive to keep comfortable, poorly functioning and less desirable than well designed subdivisions. The attached alternative subdivision design for this area shows 57 lots facing north or south and 13 facing east or west. It is very possible to redesign this subdivision to comply with general plan policy regarding solar orientation and energy efficiency.

This subdivision asks for a variance from standard street design requirements by eliminating an eight foot park strip where street trees are planted. This request was denied by the Planning Commission in 2006. You can deny the request. Merced is a Tree City USA , promoting street trees wherever possible. Besides landscaping, the parkstrips provide a separation between pedestrians (especially children) and fast moving traffic, thereby increasing safety. They shade the area thereby cooling the neighborhood. .

Though the council overrode the decision of the Planning Commission in 2006, the council is very different in 2020. There is concern on the council that all areas of Merced are treated equally well. This South Merced subdivision has smaller lots, with bad solar orientation design coupled with a request to reduce street tree landscaping. What is your role as a Planning Commissioner reviewing a CUP in which you have great freedom to change the design? Is it to hear neighbors objections (there are none yet). Is it to confirm that the staff has ensured the subdivision meets the letter of the zoning law (if not the spirit) ? Is your role to use your authority to improve and protect the general well being of the current and future residents of this neighborhood by requiring the design of the subdivision to be of high quality and comply with General Plan policies ?

I urge you to deny the subdivision proposal without prejudice and direct the developer to redesign the subdivision to improve solar access, and to restore the landscape park strip with street trees .

SCALE: 1"=50'



SCALE 1" = 80'

ALTERNATIVE  
DESIGN  
SUBDIVISION  
# 1315  
DEC. 2020  
M. BELLUOMINI

