



December 11, 2024

City of Visalia
Planning and Community Preservation Department
Attn: Brandon Smith, Principal Planner
315 East Acequia Avenue
Visalia, CA 93291

RE: Zone Text Amendment No. 2024-04 – Public Comment from the City of Visalia Historic Preservation Advisory Committee.

Dear Mr. Smith,

Thank you for the opportunity to provide comment on Zone Text Amendment No. 2024-04, a request by the City of Visalia to add to and amend Visalia Municipal Code (VMC) regulations pertaining to accessory dwelling units (ADU) and single-family residential objective design standards (ODS). The City of Visalia Historic Preservation Advisory Committee (HPAC) reviewed the August 2024 draft ADU/ODS proposal and revised proposal presented to the Visalia Planning Commission on November 12, 2024. After review of the proposals the HPAC provides the following comments listed below *[Please note, section numbers referenced in this letter are from the November 12, 2024, version of the ADU/ODS ordinances]*:

Objective Design Standards

1. Section 17.12.140.B of the ODS currently excludes sites on the City's Local Register of Historic Structures from its requirements. It is recommended that this section be modified to also exclude properties within the Historic District.

Guidelines for new development within the Historic District are already present within VMC Chapter 17.56 (Historic Preservation District) and are designed to encourage "compatibility or complementariness with a majority of structures in the immediately surrounding area". The existing guidelines in VMC Chapter 17.56 ensure that new structures maintain aesthetics that are in keeping with adjacent historic structures, thereby preserving the unique look and appeal of historic streetscapes. The existing provisions are also not beholden to previous construction that may have been present on a vacant property and are thus supportive of new development.

The ODS as proposed does not contain any specific guidance for new development in historic neighborhoods. It does not support the incorporation of historic architectural elements in new residences, nor does it encourage compatibility with surrounding structures. If applied to sites in the Historic District, the ODS would potentially create new development that, while consistent with the ODS, would be out of place in a historic neighborhood setting.

Please also note that as part of its goal setting for 2025-2026, the HPAC has listed the creation of design guidelines for the development of structures in the Historic District and Local Register. This would assist in supporting the regulations listed within VMC Chapter 17.56 by providing clear guidance for new development. Adoption of the ODS as proposed would only hinder the HPAC from performing its duties to preserve the character of the Historic District.

Accessory Dwelling Unit Ordinance

1. For Section 17.14.090.E.4 it is recommended that “e.g.” be added prior to the list of roof features and roof materials provided, to indicate that architectural roof ornamentation is not limited to solely those elements listed in the ordinance. This will make this section consistent with proposed Sections 17.14.090.E.2, 17.14.090.E.3, and 17.14.090.E.5, all of which contain “e.g.” prior to listing architectural features.
2. Please correct the spelling of “alterations” in Section 17.14.090.E.1 of the ADU Ordinance.

Thank you again for the opportunity to comment on this project. If you have any questions concerning this letter or any other matter, please contact HPAC liaison and Associate Planner Cristobal Carrillo at (559) 713-4443 or e-mail cristobal.carrillo@visalia.city.

Kind regards,



Tyler Davis, Chair
City of Visalia
Historic Preservation Advisory Committee

Cc: Visalia City Council, Leslie Caviglia, City Manager, Paul Bernal, Planning and Community Preservation Director