

November 20, 2023

RE: Objective Design Standards

Dear Mayor Lee and Members of City Council,

These are comments we would like to include:

1. We would like to ensure more local scrutiny of the homes on the south side of 4th Avenue by excluding this street in the ODS. In the mid 1980's a series of single family Craftsmen homes on 4th and 5th Avenue were proposed for demolition for a new 5-story development. These 6 homes were all saved from demolition and restored beautifully into move-in condition and there are 6 families living in them now. Lot accumulation is our main concern along the south side of 4th Avenue and north side of 5th Avenue. We have an outdated 1989 building survey and the neighborhoods do not have the preservation tools such as Historic or Conservation Districts to protect the pre-war homes in the traditional neighborhoods.
2. We appreciate that you recognized the Spanish Colonial Revival architecture in our area, but these particular blocks in the Gateway are all Craftsmen architecture. We would like to see the residential architectural style in the Gateway changed to Craftsmen from the recommended Spanish Colonial Revival, since there are 65 Craftsmen style homes on the south side of 4th, and along 5th Avenue. We also have other Craftsmen style developments which include: Fire Station 24, Humboldt Square town homes, The Metropolitan Apartments, and the Gateway Commons Condos. We would like to see the Spanish Colonial Revival style remain for the mixed use projects in the Gateway since they complement one another.
3. How do you plan to incorporate the neighborhoods into the ODS? Each neighborhood has it's own characteristics and could be a separate zone like the City of Santa Barbara Objective Design Standards. The Santa Barbara ODS could serve as a model for San Mateo.
4. In reference to the detached ADU's with single family homes in R1 and R2 zoned neighborhoods, the ADU Handbook does not require compatible architecture with the primary unit and the Detached ADU. We would like to see the detached ADU's be of similar architecture, materials, finishes, and roof designs with the primary unit for design compatibility. This probably has been addressed in the ODS, and we would like to see this architectural compatibility addressed in the ADU Handbook as well.
5. Three years is a long period of time to revisit the Objective Design Guidelines again. The Duplex Design Guidelines is also an excellent resource. Will you incorporate this into the ODS eventually? We would like to see duplex projects that are compatible in architectural style, size and mass, and blend into the existing neighborhoods.

Thank you.

Michael Weinbauer
Maurine Killough
David Light
Francie Souza
Laurie Watanuki
Michelle Maccarra

November 20, 2023

[Sent via email: City Council (CityCouncil@cityofsanmateo.org)]

City Council
City of San Mateo
330 West 20th Avenue
San Mateo, CA 94403

Re: Supplemental San Mateo Objective Design Standards (ODS) Comments

Dear City Council members:

On behalf of HSC Property Owner LLC, the owners of the Hillsdale Shopping Center and surrounding properties (Owners), we are writing with additional comments and concerns on the draft Objective Design Standards for Multi-Family and Residential Mixed-Use Projects (ODS) scheduled to be considered by the City Council on Monday, November 20th. Our prior comment letter submitted on November 13, 2023 is attached for reference ([Exhibit A](#)).

Request for Continuance

We continue to have concerns about the specific standards in the ODS as well as the implications for the processing of housing entitlements in San Mateo. Accordingly, we ask that the City Council conduct an in-depth discussion of the ODS and also continue the hearing for additional consideration. The following provides additional explanation.

Background

As background, we note that the processing of the ODS has moved very quickly. While there were roundtable meetings held in the Spring and Summer of this year, the first draft of the roughly 80-page ODS was not released until August. For such a detailed design document, with meaningful impacts to housing entitlement design, costs and processing, we request that the City Council considers the ODS carefully. We understand that the hearing on November 20th will be the first time that the City Council considers the ODS. We understand that there are funding constraints affecting the processing, but we still request thoughtful deliberation¹. For example,

¹ We note that other cities have engaged in extensive and lengthy objective standards processes. For example, Daly City has focused their Objective Design Standards on a specific zone and in a more abbreviated fashion (20 pages long) that they have been working on for 3 years. As reported in a November 7 staff report (available here: <https://www.dalycity.org/DocumentCenter/View/8479/Staff-Report?bidId=>), the staff wrote "In July 2023, Placeworks presented the Commercial Mixed Use (C-MU) Zoning District Standards to the City Council, as well as "test fit" cases that detailed how the proposed regulatory concepts would work on actual properties." This reinforces the need to conduct a test fit and ensure that the standards are feasible. Oakland's process began in November 2022 and remains on-going as shown here: <https://www.oaklandca.gov/topics/objective-design-standards>. Finally, we note that San Mateo Heritage Alliance previously wrote a letter in August recommending the City of San Mateo use the Santa Barbara Objective Design Review process as an

we believe that it would be entirely appropriate to hold a special hearing to consider these important new City-wide standards.

On-going Concerns

As shown in the attached prior comment letter, we have a number of concerns. To name one on-going concern, we simply do not understand the meaning and significance of Section 7.3.4, as previously communicated:

22. Section 7.3.4 – Laurel Creek views

The ODS requires in this section that all residential units and residential units in a mixed-use development in the Hillsdale Station Area must have at least one (1) window facing Laurel Creek. We recommend eliminating this requirement. It is not practical for all of the units across the Hillsdale area to face the creek. Even on properties adjacent to the creek, imposing this requirement would limit building configurations and reduce the density and total units that could be developed on adjacent properties.

Accordingly, we recommend the deletion of Section 7.3.4:

~~All residential units and residential units of mixed-use development shall have at least one (1) window that faces the creek.~~

This standard has the potential to drastically affect buildings facing Laurel Creek. Will it only apply to units facing the creek or will it preclude the construction of units that do not face the creek because they cannot include windows facing the creek? Because the application is unclear and subject to judgement, it is, therefore, subjective.

We also re-emphasize our previously submitted comments, all of which seem likely to affect housing costs and, ultimately, yield:

example. The Santa Barbara Objective Design Review has gone through a more exhaustive public review process (identified here: <https://santabarbaraca.gov/government/priorities-policies/housing-initiatives/design-standards>), including a 6-month public comment period from June 26, 2023 until December 31, 2023 to allow time to run test fits and for the public to provide comments.

21. Section 7.3.2.A.2.B – Ground floor parking

This section currently provides that if structured parking is included within a mixed-use building, a maximum of fifty percent (50%) of the ground floor may be dedicated to parking. This limitation should be softened or removed because it would severely reduce the commercial viability of multifamily residential development, including affordable housing development.

Instead, we recommend applying the same screening requirements in Section 7.3.2.B to ground floor parking, which could include requirements for specified materials, art installation, or other requirements to improve the streetscape experience.

2. Vehicle parking shall be prohibited in front setback areas and along primary and secondary street frontages
 - a. If a parking garage is an individual building part of a project of a project, retail, or other active uses, such use shall occupy the ground-floor space of that parking garage along at least ninety (90) percent of the frontage of El Camino Real, at a minimum depth of forty (40) feet.
 - b. ~~If structured parking is within a mixed-use building, a maximum of fifty (50) percent of the ground floor may be dedicated to parking. The parking screening requirements provided in Section 7.3.2.B shall apply to ground floor parking in a mixed-use building.~~

23. Section 7.6.2.A.1 – Building Design & Articulation

This section requires that all upper-floor residential units facing local streets include at least one (1) outdoor deck, balcony, or bay window. We recommend removing this requirement. It is impractical for smaller units with less street-facing frontage, increases costs and makes it more difficult to provide affordable housing, and mandates a very specific, uniform aesthetic on all local streets contrary to the vision expressed in the ODS renderings, where it is unlikely that any of the buildings shown comply with this requirement. If the Council decides not to remove this requirement, it should be reduced to apply to only 25% of units facing local streets.

Accordingly, we recommend the following deletion from Section 7.6.2:

- ~~1.—All upper-floor residential units facing local streets shall include at least one (1) of the following:
 - a.—Occupiable outdoor deck designed as usable space
 - b.—Balcony
 - c.—Bay window~~

25. Section 7.6.3 – Landscaping & Open Space

While this requirement imposes new open space requirements on large-scale development, there are already requirements in the General Plan Update that have been subject to rigorous testing and community consultation. Accordingly, we recommend removing this requirement as redundant and relying on the General Plan Update requirements.

Accordingly, we request the following deletion of Section 7.6.3:

~~For mixed-use developments of at least three (3) acres of site area or an entire block, a publicly accessible park or plaza of at least ten thousand (10,000) square feet in area, with a minimum dimension of fifty (50) feet for any side, shall be developed within the central portion of the site.~~

We did not see any revisions to the version of the ODS published as part of the City Council packet. We understand that staff may be considering additional revisions, but we are uneasy that we have not seen a written version to review.

Additional Concerns

Our own process has been iterative and we have additional comments after further conversations with professionals in the industry.

1. Section 4.6.5.D -- Garage Doors

The ODS states: "For projects with ten (10) or more residential units, individual garage doors shall not face a public street but shall be oriented towards an alley or private street/ driveway internal to the project."

For most infill projects, this is infeasible in most cases or would require a significant reduction of buildable area to accommodate an alley or private street. We recommend deletion.

2. Section 2.2 – Applicability

We also remain somewhat unclear on the implications for the Hillsdale Shopping Center redevelopment project. We previously explained the rationale for requesting that the variety of overlapping zoning code provisions, specific plans, master plans, and other City planning documents that already apply to the Hillsdale Shopping Center vicinity (see page 53) continue to control, rather than adding another layer of ODS to the site. We request that Section 2.2 discussing applicability is clarified (with new text in red) as follows to reflect the other entitlement documents that should control in the event of a conflict with the ODS:

D. In the event of any internal conflict within this document between citywide standards and standards applicable to a specific plan area, the specific plan area standards shall apply (as reflected in a master plan, planned development or other similar entitlement).

Conclusion

As discussed above, we continue to have several concerns regarding individual design standards in the ODS. Our team endeavors to program development that will be consistent with objective standards, but we are concerned it will be impossible to do so given the 80+ pages of new standards. We request that the City Council provide additional time and process to deliberate on these standards, and thoughtfully consider what is a reasonable new layer of standards that will affect housing design, costs and processing.

We thank you for your additional time and consideration of this important topic.

Sincerely,



David Bohannon

Cc: Laura Richstone (LRichstone@cityofsanmateo.org)
Zach Dahl (zdahl@cityofsanmateo.org)
Manira Sandhir (msandhir@cityofsanmateo.org)
Mazarin Vakharia (mvakharia@cityofsanmateo.org)
Planning Commission (PlanningComission@cityofsanmateo.org)
John Ebnetter (jebnetter@cityofsanmateo.org)
Seema Patel (spatel@cityofsanmateo.org)
Adam Nugent (anugent@cityofsanmateo.org)
Martin Wiggins (mwiggins@cityofsanmateo.org)
Margaret Williams (mwilliams@cityofsanmateo.org)
Amourence Lee (alee@cityofsanmateo.org)
Lisa Diaz Nash (ldiaznash@cityofsanmateo.org)
Adam Loraine (aloraine@cityofsanmateo.org)
Rob Newsom, Jr. (rnewsom@cityofsanmateo.org)
Rich Hedges (rhedges@cityofsanmateo.org)
Chelsea Maclean (chelsea.maclean@hklaw.com)
Kohar Kojayan (kohar@kohplanning.com)

Exhibit A

November 13, 2023 ODS Comment Letter

November 13, 2023

[Sent via email: LRichstone@cityofsanmateo.org]

Laura Richstone
Associate Planner
City of San Mateo
330 West 20th Avenue
San Mateo, CA 94403

Re: San Mateo Objective Design Standards (ODS) Comments

Dear Ms. Richstone:

On behalf of HSC Property Owner LLC, the owners of the Hillsdale Shopping Center and surrounding properties (Owners), we appreciate the opportunity to submit comments on the October draft Objective Design Standards for Multi-Family and Residential Mixed-Use Projects (ODS) that was recently reviewed by the Planning Commission during its October 24, 2023 meeting and will soon be before the City Council.

As you may know, the Owners have embarked on a process to collect community input to reimagine the Hillsdale Shopping Center for its next evolution – from a shopping center into a great neighborhood with retail, homes, supporting commercial development and more. As part of this process, our team is actively monitoring other long-range planning efforts in the City to understand the City's needs and goals so that the long-range planning and development efforts for the Hillsdale Shopping Center can evolve in alignment with the City's long-term vision. Accordingly, we have monitored the development of the ODS, and we applaud the City (and most recently the hard work and insight of the Planning Commission) for its efforts thus far. The Owners wish to submit for consideration the following comments on the October draft of the ODS in order to share the insights that the Owners have gained from their own planning efforts for the Hillsdale Shopping Center.

1. Section 2.2 – ODS Applicability to Hillsdale Shopping Center

As a preliminary matter, the Owners request that the ODS clarify the status of the Hillsdale Shopping Center and the surrounding area of related properties—namely, that the ODS does not target this area. As the current draft version acknowledges, there are a variety of overlapping zoning code provisions, specific plans, master plans, and other City planning documents that already apply to the Hillsdale Shopping Center vicinity (see page 53), and the current draft states that specifically-applicable standards should apply where in conflict with general standards (Section 2.2). It follows that the existing set of City planning documents applicable to the

Hillsdale area should continue to apply to the project instead of new, non-targeted requirements. In fact, most of the Hillsdale-specific requirements in the ODS originate from the currently-controlling planning documents, notably the Hillsdale Station Area Plan, which provides additional guidance and context. Future redevelopment of the Hillsdale Shopping Center is currently in development consistent with the Hillsdale Station Area Plan, which specifies other standards and guidelines in greater detail and with more optionality to allow for a high-quality development program that suits the City's needs and market demands. The Owners are also already in the process of developing even more detailed ODS-type development standards for any redevelopment that accomplishes the same goals as the ODS, tailored to the unique needs of the Hillsdale area, and would be included as conditions to any future project approval. This is consistent with the "master plan" requirements imposed by several existing planning documents (for example, see General Plan 2030 p. II-63, Hillsdale Station Area Plan p. 64). Therefore, the Owners request that the ODS include that the Hillsdale area is exempt in Section 2.2 where the ODS specifies its applicability in different circumstances.

Accordingly, we request that the following be included as a new subsection H to Section 2.2:

H. These Objective Design Standards shall not apply in the Hillsdale Station Area, where existing standards and guidelines in existing specific plans and other planning documents already provide comprehensive design coverage. Further, any future redevelopment of the the Hillsdale Shopping Center is required to include master plan-level design standards analogous to these Objective Design Standards.

2. Section 2.3 – Building Types & Number of Stories

As currently provided, the ODS differentiates between "Mid-rise" buildings as four (4) to seven (7) stories and no more than ninety (90) feet in height, and "High-rise" buildings as eight (8) or more stories and more than ninety (90) feet in height. While these heights are entirely appropriate, we recommend modifying the number of stories to allow up to eight stories for "Mid-rise" buildings and to designate "High-rise" buildings to include nine (9) or more stories, and update references to the number of stories associated with each building type throughout the ODS. This is consistent with widely-applicable building code requirements for construction types and maximizes potential housing production. It is also consistent with Planning Commissioners' comments during their October 24, 2023 meeting.

Accordingly, we recommend the following revisions to Section 2.3:

These standards establish regulations for three general building types: low-rise, mid-rise, and high-rise buildings, defined below:

- A. Low-rise shall mean buildings up to three (3) stories but no more than thirty-five (35) feet in height.
- B. Mid-rise shall mean buildings between four (4) and ~~seven (7)~~ eight (8) but not more than ninety (90) feet in height.

- C. High-rise shall mean buildings ~~eight (8)~~ nine (9) or more stories or more than ninety (90) feet in height.
- D. Where a standard within this document does not specify building type, the standard shall apply to all building types.

3. Section 3.1.2 – Pedestrian Paseos

The current draft ODS includes detailed requirements for the dimensions and amenities of pedestrian paseos. We strongly support design efforts to encourage pedestrian-oriented development and circulation, but recommend scaling back the scope of these requirements to accommodate other amenities that serve the same purposes, such as modest skybridges to connect structures over paseos across multiple levels of active space.

Accordingly, we recommend the following revisions to Section 3.1.2:

If provided, pedestrian paseo(s) shall:

- A. Be open to the sky and connect to public sidewalks (i.e., paseos shall not dead end), except to allow design features such as sky bridges or elevated walkways.
- B. Have a minimum twelve (12)-foot width, as measured from building face to adjacent building face for low-rise buildings.
- C. Have a minimum twenty (20)-foot width, as measured from building face to adjacent building face for mid-rise and high-rise buildings.
- D. Provide ~~a minimum eight (8)-foot wide~~ public pedestrian access ~~easement~~ within the required minimum paseo width ~~for pedestrian access.~~
- E. Provide pedestrian scale lighting along the length of the paseo. ~~Such lighting shall be mounted not higher than twelve (12) feet, that~~ meets the latest Illuminating Engineering Society (IES) recommended values, and ~~be~~ is directed downward or ~~have~~ has a light cap.
- F. Pedestrian paseos shall include at least ~~three (3)~~ two (2) of the following pedestrian amenities every ~~twenty (20)~~ thirty (30) linear feet:

1. Bench(es)	5. Cafè
2. Shade structure(s)	6. Textured, multi-colored, or patterned pavement
3. Tree(s) consistent with the City Landscape Ordinance	7. Public art
4. Water feature or water fountain	8. Decorative overhead lighting

4. Section 3.2.1.B – Project Frontage for Parking

The ODS currently limits surface parking areas or driveways from occupying not more than twenty-five percent (25%) or sixty (60) feet of project frontage, whichever is greater. Because there may be unique circumstances for some uses where a greater proportion of project frontage will be necessary for surface parking or driveways, we request that this requirement be eliminated. Instead we anticipate that the separate screening requirement satisfies the intent to screen parking from public view and activate the street experience.

Accordingly, we recommend that the following language should be removed from Section 3.2.1:

Where vehicles are visible from a public right-of-way (i.e. surface parking lots or rooftop garages), the following standards shall apply:

A. Parking areas shall not be established within any required front setback area.

~~B. Surface parking areas, including driveways, shall not occupy more than twenty-five (25) percent or sixty (60) feet of the project frontage, whichever is greater.~~

~~C.~~B. Parking areas shall be screened from view from the adjacent primary street with a three (3)-foot-high textured or patterned block wall that is capped, or a landscape hedge, or combination of the two. If a wall is used, the wall shall be treated with a graffiti-resistant coating.

~~D.~~C. Chain link or vinyl fencing shall be prohibited as a screening material for parking, lightwells, and utility structures/equipment.

5. Chapter 4 – Massing and Articulation Requirements Generally

The ODS includes a wide variety of massing and articulation requirements, some of which are discussed further below. Such requirements can restrict flexibility of design and use, as do several provisions in the draft ODS. To rectify these issues, we strongly support the changes recommended by the Planning Commission and encourage the City Council to adopt those recommendations. Specific additional recommendations follow.

6. Section 4.1.1 – Blank Walls

Currently, the ODS limits blank walls to a limit of twenty (20) feet in length on all stories. While this is reasonable on walls facing streets, it would unintentionally impact design on off-street walls. We recommend revising this section to limit the prohibition on blank walls greater than twenty (20) feet in length to street-facing walls.

Accordingly, we recommend the following revision to Section 4.1.1:

Blank walls that face a public street shall be limited to a maximum of twenty (20) feet in length on all stories.

7. Section 4.1.4 – Qualify minimum change between planes and minimum façade portions for massing breaks

Section 4.1.4 requires that structures of three (3) or more stories must follow the rule of thirds and divide the structure into at least three primary masses. In addition to the changes recommended by the Planning Commission, we also recommend providing clear flexibility to determine the width of the primary masses, and *not* to require each to be exactly one-third of the structure. Such a requirement could unintentionally constrict potential uses and design programs. Instead, the standard could include a minimum percentage of overall façade length (i.e., require the minimum width of each primary mass to be at least 20% of the overall façade length). In addition, this requirement should also specify a minimum two (2) feet change in plane between each massing break to assure that the breaks are more than perfunctory.

Accordingly, we recommend the following revisions to Section 4.1.4 and the removal and/or replacement of Figure 21:

Structures of three (3) or more stories (measured from existing grade) shall ~~follow the rule of thirds in which a structure is~~ be divided into at least three primary masses, where each primary mass is separated by at least a two (2) foot minimum change in plane between each massing break, and where each primary mass shall contain a minimum width consisting of at least twenty (20) percent of the overall façade length. ~~Possible ways to break a horizontal mass into three elements are illustrated below.~~

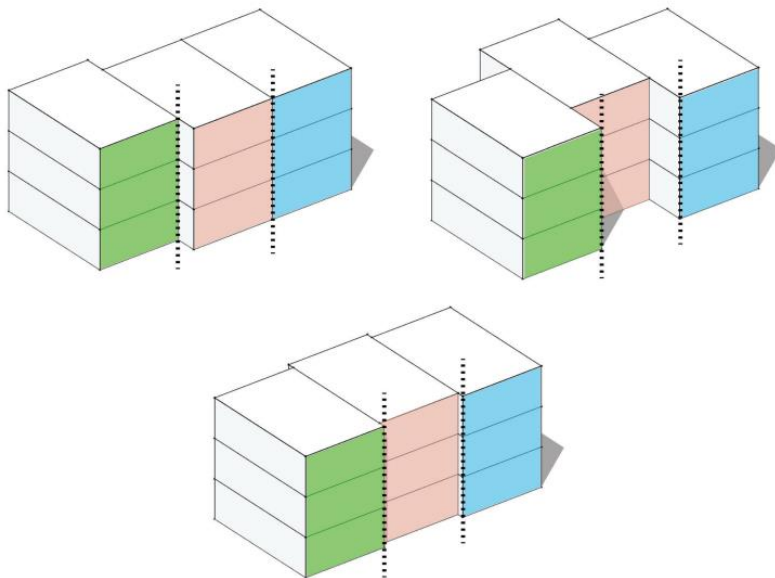


Figure 21: Possible ways to divide a horizontal mass into three elements (Section 4.1.4).

8. Section 4.1.6.B – Wall Planes

The ODS includes a variety of options for wall plane treatments, including horizontal and vertical wall plane changes and flat plane variations. The ODS requires “at least one (1) of the following wall plane treatments shall be incorporated into the building design as described below,” but does not specify if a single wall plane treatment is required on the horizontal *and* vertical wall planes *and* flat planes, or only one wall plane treatment is required on *either* horizontal *or*

vertical wall planes or flat planes. We advise the later. For context, horizontal wall plane changes can pose significant challenges for residential development.

Accordingly, we request the following revision to the initial requirement of Section 4.1.6.B:

- B. Wall Planes.** At least one (1) of the following wall place treatments on either the horizontal wall plane, vertical wall plane, or flat planes shall be incorporated into the building design as described below.

9. Section 4.1.6.B.3.a – Flat Plane Variation

The ODS as drafted requires at least four (4) of a provided list of design elements every twenty (20) to forty (40) feet of horizontal street frontage of building façade. We recommend reducing this requirement in order to avoid overly complicated and busy façades to a minimum of three (3) (or lower) design elements per frontage segment.

Accordingly, we recommend revising the first sentence of subsection (a) of Section 4.1.6.B.3 as follows:

- a. For every twenty (20) to forty (40) feet of horizontal street frontage, the building façade design shall change in detailing to create distinct building segments. This change in detailing shall include at least ~~four (4)~~three (3) of the following:

10. Section 4.2.1.A – Mixed-Use Ground Floor Commercial Wall Glazing

The ODS currently requires seventy-five percent (75%) of ground floor wall to be glazed in mixed-use developments. We recommended using a linear-foot basis instead to provide greater flexibility for larger structures with more complex and demanding ground floor usage needs to support diverse uses above the ground floor.

Accordingly, we recommend revising Section 4.2.1.A as follows:

- A. At least ~~seventy-five (75)~~sixty (60) percent of the ground floor ~~commercial wall area~~linear street frontage shall be glazed.

11. Section 4.6 – Windows & Doors Generally

The draft ODS includes a variety of standards for windows and doors, and the Planning Commission provided numerous well-considered revisions at their October 24, 2023 meeting. We agree with and recommend approval of the Planning Commission's changes, and recommend one additional change below.

12. Section 4.6.1.C.3 – Curtain walls and upper-floor window size

As drafted, the ODS imposes requirements on all windows and doors except curtain wall windows, and includes that "Windows, bays, doors, arches, and balconies must be equal in size

or smaller than the element they are aligned with on the floor below.” First, the exemption for curtain wall windows should encompass window walls and storefronts. Second, the upper-story window size limit is overly-restrictive. While it is appropriate for certain architectural styles and scale—most notably Spanish-style single-family residences—it prohibits many other architectural styles for single-family homes and is inappropriate for larger-scale buildings, in particular multi-family and mixed-use residential development. Anecdotally, few of the mixed-use mid-rise buildings shown in the draft ODS comply with this requirement.

Accordingly, we recommend the following revisions to Section 4.6.1.C and the removal of Section 4.6.1.C.3:

- C. **Window and Door Size.** The following shall apply to all windows and doors except for curtain wall windows, window wall, and storefront.
1. Windows, bays, and doors shall be vertically oriented, rectangular, and taller than they are wide.
 2. For non-residential uses, vertical window elements shall be maintained through proportionality and divided lights.
 - ~~3. Windows, bays, doors, arches, and balconies must be equal in size or smaller than the element they are aligned with on the floor below.~~
 4. Where wider glazed openings are desired use, ganged or group windows, subject to the following:
 - a. Grouped windows shall have a minimum of three (3) inches of building façade surface between them
 - b. Ganged windows shall have a mullion between them

13. Section 4.7.1.C – Materials Quality

Consistent with the concerns raised by members of the Planning Commission, we recommend removing the standard for minimum material life expectancies. Life expectancies cannot be readily calculated for many construction materials, including some of the most durable (cut stone) because they do not have a pre-determined lifespan. As a result, this standard is of little practical effect and should be removed.

Accordingly, we request the removal of Section 4.7.1.C.:

~~C. **Quality.** Durable architectural materials and finishes with a minimum life expectancy of fifty (50) years and roofing with a minimum life expectancy of thirty (30) years shall be used on the exterior of the buildings.~~

14. Materials: Table 2A and Table 2B

A broad range of construction materials should be allowed for projects in the City. This provides greater flexibility to adapt project design to changing materials costs and new technologies. It enables more sustainable design and is critical to controlling the price of housing development.

We recommend the following changes to Tables 2A and 2B:

Table 2A:

Material	Notes
Brick	Including brick veneer
Concrete	
Stone	
Stucco	True stucco only (Lime or Portland Cement); excluding synthetic stucco and Exterior Insulation Finishing System (EIFS)
Plaster	Verified for exterior use only
Fiber Cement Panel	
Glass	
Tile	
Rammed Earth	Low-rise only
Wood siding	Shingle, Clapboard, Panel
Metal	Excluding corrugated metal
Wood	Plywood allowed only as accent; not a main material
<u>Precast concrete</u>	
<u>Glass Fiber Cement Panels</u>	
<u>Ceramic</u>	
<u>Porcelain</u>	
<u>Terracotta</u>	
Building Base	
Brick	
Concrete	
Stone	
Metal	
Ceramic Tile	
Metal	Excluding aluminum and corrugated metal
Wood	Plywood allowed only as accent; not a main material
Fiberglass composite	
Glass	
<u>Porcelain</u>	
<u>Terracotta</u>	

Table 2B:

Material	Notes
Window Frames	
Wood	Excluding plywood
Metal	Excluding corrugated metal
Fiberglass	
Composite	
Vinyl	
Roofing Materials	
Composite, asphalt, and fiberglass shingle	
Clay and concrete tile	
Slate	
Green roofs	
Solar shingles	
Colored metal/natural copper	
<u>Single-ply roof membranes</u>	

15. Section 5.1.1.B – Private balconies and open space

This ODS section contains requirements for private open space for individual residential units, including balconies. With respect to the balcony requirements, we request further explanation of the meaning of “open” as applied to glass guardrails, and also request further guidance on if 50% clear glass and 50% obscured glass can be used for guardrails.

With respect to enclosed ground-floor open spaces, we recommend that the ODS allow a greater range of enclosure materials, including steel or aluminum fencing, as well as stainless steel or cable enclosures. Allowing a greater range of materials will provide projects with better flexibility to adapt to unique contexts and provide better products for residents.

Accordingly, we recommend the following additions to Section 5.1.1.B:

B. Private Open Space for Individual Units

1. The fronts and sides of balconies shall consist of obscured glass, slats, or partially transparent grating or railing that is at least fifty (50) percent open.
2. Enclosed private ground-floor open spaces fronting a public street and/or sidewalk shall have an enclosure between three (3) and four (4) feet in height.

Enclosure materials shall be limited to the following:

- a. Walls of a color and material(s) that match those used for the main building(s)
- b. Wrought iron, steel, or aluminum fencing
- c. Glass
- d. Wood
- e. Stainless steel

f. Cable

16. *Figure 7.1 – Location of Hillsdale Station*

Figure 7.1 maps the various specific plan areas in the City, but also locates Hillsdale Station at its old location prior to the 25th Avenue Grade Separation Project and the construction of the new Hillsdale Station, completed in 2021. We recommend relocating Hillsdale Station as indicated in this figure to its current location.

17. *Section 7.2.1.B.2 – Build-to-Lines for corner parcels*

The ODS currently requires that for corner parcels, buildings must be built to the required street setback for a minimum of fifty percent (50%) of the side street property frontage. While we recognize that this serves important planning and urban design goals in general, it does not apply well to long buildings with large floorplates, and can impact the commercial viability of such projects by interfering with efficient floorplate design strategies. In turn, this can impact the viability of housing production on floors above. As a result, we recommend limiting the scope of this requirement by either cabining this requirement to apply only to building frontages less than a specific length, or to establish a maximum required property length at the required setback.

We recommend the follow revision to Section 7.2.1.B.2:

B. Build-to-Lines

1. A minimum of fifty (50) percent of the total property line frontage along El Camino Real shall be occupied by buildings built to the required setback line. Building(s) may be set back up to a maximum of twenty (20) feet behind the build-to line to provide a public amenity such as a wider sidewalk, plaza, outdoor seating, outdoor dining, or landscape area or any combination thereof.
2. ~~For corner parcels, the building shall be built to the required street side setback for a minimum of fifty (50) percent of the side street property frontage.~~ For parcels with greater than one hundred fifty (150) feet of side street frontage, buildings shall not be required to be built along the side street at a length greater than seventy-five (75) feet.

18. *Section 7.2.1.C – Frontage Features*

Here, the ODS requires one of a specified list of ground floor elements to be provided as a function of property frontage along El Camino Real. We applaud the City's effort to design standards that will activate the streetscape, and recommend adding "canopies" of all materials to this list as an outgrowth of the existing "awnings" and "trellises" currently listed.

We request the following addition to Section 7.2.1.C:

- C. **Frontage Features.** For each twenty-five (25) feet of building frontage along El Camino Real, at least one (1) of the following ground floor elements shall be included (can be multiple instances of one [1] element):
1. Arcades
 2. Awnings (no wider than a structural bay)
 3. Trellises
 4. Canopies (of all materials)
 5. Residential entry porch

19. Section 7.2.2.A – Curb Cuts

This section limits curb cuts to one (1) “per development” along El Camino Real. We recommend amending this provision to “per building” in recognition that there will be multi-building developments constructed along El Camino Real, and individual buildings may require individual curb cuts to accommodate required loading zones and other services necessary for each building within the development.

Accordingly, we recommend the following revision to Section 7.2.2.A:

- A. Curb Cuts. Curb cuts along El Camino Real shall be prohibited if alley or secondary frontage is available. A maximum of one (1) curb cut along El Camino per ~~development~~building is permitted.

20. Section 7.3.1.A.1 – Setbacks

In the Hillsdale Station Area, the ODS currently requires setbacks from the curb along El Camino Real to create at least twenty (20) feet combined effective sidewalk. We recommend that this be amended to include that setbacks include curb cuts and cut outs for bus stops, out of recognition that both currently exist and will be required in the future along El Camino Real in the Hillsdale Station Area.

Accordingly, we request the following addition to Section 7.3.1.A.1:

1. Buildings shall be set back from the back of curb along El Camino Real to create at least twenty (20) feet of combined effective sidewalk, including curb cuts and cut outs for bus stops.

21. Section 7.3.2.A.2.B – Ground floor parking

This section currently provides that if structured parking is included within a mixed-use building, a maximum of fifty percent (50%) of the ground floor may be dedicated to parking. This limitation should be softened or removed because it would severely reduce the commercial viability of multifamily residential development, including affordable housing development.

Instead, we recommend applying the same screening requirements in Section 7.3.2.B to ground floor parking, which could include requirements for specified materials, art installation, or other requirements to improve the streetscape experience.

Accordingly, we request the following revision to Section 7.3.2.A.2.B:

2. Vehicle parking shall be prohibited in front setback areas and along primary and secondary street frontages
 - a. If a parking garage is an individual building part of a project of a project, retail, or other active uses, such use shall occupy the ground-floor space of that parking garage along at least ninety (90) percent of the frontage of El Camino Real, at a minimum depth of forty (40) feet.
 - b. ~~If structured parking is within a mixed-use building, a maximum of fifty (50) percent of the ground floor may be dedicated to parking. The parking screening requirements provided in Section 7.3.2.B shall apply to ground floor parking in a mixed-use building.~~

22. Section 7.3.4 – Laurel Creek views

The ODS requires in this section that all residential units and residential units in a mixed-use development in the Hillsdale Station Area must have at least one (1) window facing Laurel Creek. We recommend eliminating this requirement. It is not practical for all of the units across the Hillsdale area to face the creek. Even on properties adjacent to the creek, imposing this requirement would limit building configurations and reduce the density and total units that could be developed on adjacent properties.

Accordingly, we recommend the deletion of Section 7.3.4:

~~All residential units and residential units of mixed-use development shall have at least one (1) window that faces the creek.~~

23. Section 7.6.2.A.1 – Building Design & Articulation

This section requires that all upper-floor residential units facing local streets include at least one (1) outdoor deck, balcony, or bay window. We recommend removing this requirement. It is impractical for smaller units with less street-facing frontage, increases costs and makes it more difficult to provide affordable housing, and mandates a very specific, uniform aesthetic on all local streets contrary to the vision expressed in the ODS renderings, where it is unlikely that any of the buildings shown comply with this requirement. If the Council decides not to remove this requirement, it should be reduced to apply to only 25% of units facing local streets.

Accordingly, we recommend the following deletion from Section 7.6.2:

- ~~1. All upper floor residential units facing local streets shall include at least one (1) of the following:~~
 - ~~a. Occupiable outdoor deck designed as usable space~~
 - ~~b. Balcony~~
 - ~~c. Bay window~~

24. Section 7.6.2.A.2 – Façade Elements

This section requires street-facing facades to include at least three (3) of six (6) listed façade elements. We recommend reducing this requirement to two (2) elements, as the guidance we have received indicates that requiring three (3) elements will lead to unnecessarily busy, aesthetically-limited building façades.

Accordingly, we request the following revision to Section 7.6.2.A.2:

2. All building facades visible from a public street or public area shall include at least ~~three~~ (3)two (2) of the following across the entire façade:
 - a. Trellises
 - b. Arcades
 - c. Awnings
 - d. Balconies
 - e. Belt courses along sill lines
 - f. Capped parapets

25. Section 7.6.3 – Landscaping & Open Space

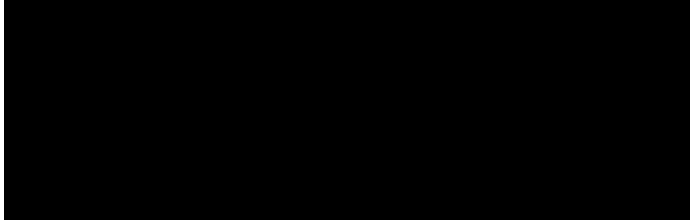
While this requirement imposes new open space requirements on large-scale development, there are already requirements in the General Plan Update that have been subject to rigorous testing and community consultation. Accordingly, we recommend removing this requirement as redundant and relying on the General Plan Update requirements.

Accordingly, we request the following deletion of Section 7.6.3:

~~For mixed-use developments of at least three (3) acres of site area or an entire block, a publicly accessible park or plaza of at least ten thousand (10,000) square feet in area, with a minimum dimension of fifty (50) feet for any side, shall be developed within the central portion of the site.~~

We thank you for your time and your consideration and your efforts on the ODS.

Sincerely,



David Bohannon

Cc: Zach Dahl (zdahl@cityofsanmateo.org)

Manira Sandhir (msandhir@cityofsanmateo.org)

Mazarin Vakharia (mvakharia@cityofsanmateo.org)

Planning Commission (PlanningCommission@cityofsanmateo.org)

John Ebner (jebner@cityofsanmateo.org)

Seema Patel (spatel@cityofsanmateo.org)

Adam Nugent (anugent@cityofsanmateo.org)

Martin Wiggins (mwiggins@cityofsanmateo.org)

Margaret Williams (mwilliams@cityofsanmateo.org)

City Council (CityCouncil@cityofsanmateo.org)

Amourence Lee (alee@cityofsanmateo.org)

Lisa Diaz Nash (ldiaznash@cityofsanmateo.org)

Adam Loraine (aloraine@cityofsanmateo.org)

Rob Newsom, Jr. (rnewsom@cityofsanmateo.org)

Rich Hedges (rhedges@cityofsanmateo.org)

Chelsea Maclean (chelsea.maclean@hklaw.com)