

From: Dashiell Leeds [REDACTED]
Sent: Friday, August 4, 2023 12:04 PM
To: Laura Richstone <lrighthouse@cityofsanmateo.org>
Cc: Christina Horrisberger <chorrisberger@cityofsanmateo.org>; Planning Commission <PlanningCommission@cityofsanmateo.org>; James Eggers [REDACTED]; Barbara Kelsey [REDACTED]; Gita Dev [REDACTED] Mike Ferreira [REDACTED]; Gladwyn D'Souza [REDACTED]
Subject: SCLP letter Re: Objective Design Standards

Ms Richstone,

We have reviewed the draft objective Design Standards and are disappointed by Section 3- Site Planning and Section 5 - Landscaping. On March 6, 2023, we sent the Planning Commission a letter outlining our concern that the approach to ODS in most Peninsula cities, including San Mateo, seems to be heavy on how "attractive" and "articulated" the buildings are and how much they will contribute to the Regional Housing Needs Assessment (RHNA) goals, but short on strong requirements for green open spaces. We asked that the letter be forwarded to the planning staff members working on the ODS requirements so you should have received a copy. We apologize if you did not. Our March 6th letter is attached to this email.

Please read the attached August 4th, 2023 letter for our full comments.

Sincerely,

Gita Dev, FAIA, Co-Chair Sustainable Land Use Committee
Sierra Club Loma Prieta Chapter

email sent from account of
Dashiell Leeds
Conservation Coordinator
Sierra Club Loma Prieta Chapter



SAN MATEO, SANTA CLARA & SAN BENITO COUNTIES

March 6, 2023

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

Planning Commission Chair and Members

Via: PlanningCommission@cityofsanmateo.org

Cc: clerk@cityofsanmateo.org

(Please forward the attached Sierra Club letter to the Planning Staff Members working on Objective Design Standards)

Subject: Residential Objective Design Standards for Public and Common Open Spaces and Landscaping

The Sierra Club Loma Prieta Chapter's Sustainable Land Use Committee (SLU) advocates on land use issues in San Mateo and Santa Clara Counties.

The current RHNA numbers are pushing most cities to greatly increase the housing densities in their cities. We have reviewed several draft Housing Elements to date and are concerned that **under pressure to increase density, cities are minimizing the importance of well designed public and common open spaces** as an essential ingredient in the livability of higher density residential developments. Many European cities are quite dense, but also include many large and small green parks, public gathering places, and well landscaped roads and promenades. **These green spaces not only offer open air relief from tightly stacked units, they also provide access to open social space and nature, mitigate noise, provide natural site drainage, and absorb air pollutants.**

It seems that most Housing Elements are not addressing this issue, so we are asking all cities to include very specific green open space design requirements in their Objective Design Standards or possibly in their Zoning Codes to compliment their Housing Element.

To that end, we have developed a checklist¹ of items which we would like to see all cities adopt as they finalize their Objective Design Standards for 2022/23. Please review the checklist to see how your city compares and whether there are items in the list that should be incorporated into your standards.

¹This checklist is limited only to promoting the inclusion of green landscaping into the design of dense residential developments, sidewalks, and parking. It does not address Objective Design Standards for more fine-grain building design and articulation such as decks, windows, material, colors, etc. Those features should be decided on a city by city basis with emphasis on the design of ground floors, which have a significant influence on the pedestrian environment and the overall public realm.

1. Common Open Space

- 1) Exterior courtyards, roof terraces, and other common areas shall be provided within all residential developments of ten² or more units in order to provide needed amenities that improve livability and public health.
- 2) At least 15% of the total gross development area shall be common open space.
- 3) At least 50% of ground level common open space shall be open and visible to the public as a public amenity.
- 4) Common open spaces, such as courtyards and gardens, shall have a minimum dimension of 30 feet from back of sidewalk and from building face to building face in each direction.
- 5) Common open spaces must be at ground level and include a minimum 50% of landscaped area planted in turf, trees, or plants that are water-wise and preferably native species. Private green roofs and deck areas are acceptable if they do not exceed 50% of the required common open space, meet the standards for vegetation and irrigation, and if 50% of the remaining common open space is provided at ground level.
- 6) A minimum of 15% of shrub size plants should be 15 gallon or larger to provide a more mature appearance and provide a more effective carbon sink upon completion of planting.
- 7) Provide greenscape with vegetation (not hardscape) on 30% minimum of outdoor space sufficient to mitigate noise, heat, wind, and feel park-like.
- 8) Preserve all mature existing trees (10" diameter trunk at 3' above grade or larger) on site³.
- 9) If provided, exterior lighting at all common open spaces with lighting focused downward, no more than 2500 Kelvin, with bi-level lighting with motion sensor.⁴
- 10) A minimum of three of the following activating features shall be incorporated into common open spaces:
 - a. Fixed or movable seating
 - b. Picnic style tables
 - c. Shade trees or shaded canopy
 - d. Outdoor kitchen equipment
 - e. Children's play equipment
 - f. Public art or interactive art, such as life-size chess game
 - g. Water feature
 - h. Other unique people-centered features
- 11) Provide 30' minimum setback from freeway right of ways in order to provide a vegetative barrier that preserves existing trees and shrubbery and adds a minimum of 24" box trees at 30 foot minimum spacing and large 15 gallon shrubs, preferably native plants. The goal is to reduce highway pollution and noise in order to reduce adverse health impacts on the neighborhood.

²Exact number to be determined by each city

³Mature trees are more effective carbon sinks, provide shade, reduce the heat island effect, and provide more health and ecological benefits than smaller, newly planted trees.

⁴Bi-level lighting maintains lighting at a low level unless motion activated. This is beneficial for energy conservation, biological diversity, and dark sky at night.

- 12) Where a property abuts a creek or shoreline, the minimum setback from the historic high water level should be 25 feet², larger is preferred. Landscaped swales shall be placed to retain runoff and no drainage shall be directed into the waterway.

2. Sidewalks

- 1) Minimum sidewalk width shall be 10 feet along building frontages.
- 2) Plant street trees in tree wells⁵ at least 3 feet in diameter, with pedestrian gratings to protect roots.
- 3) Sidewalks shall include street furniture, artwork, and other amenities to activate the pedestrian realm.

3. Building and Block Size

- 1) Block sizes establish the scale and character of the community and can help break the visual impact of long building walls, create connected pedestrian-oriented neighborhoods, and contribute to urban greening.
- 2) Blocks greater than 400 feet in length shall be broken midblock with a landscaped publicly accessible deep courtyard, pocket park, street, arcade, or paseo.
- 3) The minimum width of a midblock break shall be 20 feet and shall include landscaping and lighting, and activating features (as described above) where appropriate.
- 4) No individual building shall be greater than 200 feet in length.
- 5) Lot coverage for higher density buildings (40 units per acre or larger) shall not exceed 75%, with the remainder allotted to open space.
- 6) Building facades facing streets or public open spaces shall have landscaped entrances to residential units or street-facing retail to enliven the streetscape. No blank walls shall be allowed at ground level.
- 7) Building facades for residential buildings shall be setback a minimum 10' from property line or back of sidewalk, whichever is closest to the building facade, to allow adequate space to plant trees and landscaping to visually buffer the building facade and reduce noise impacts from the street.

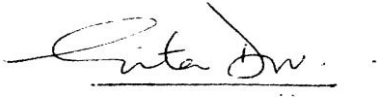
4. Parking

- 1) A minimum of 15% of all surface parking lots shall be landscaped.
- 2) Parking stalls shall include shade elements such as trees, vine-covered trellises or overhead solar panels.

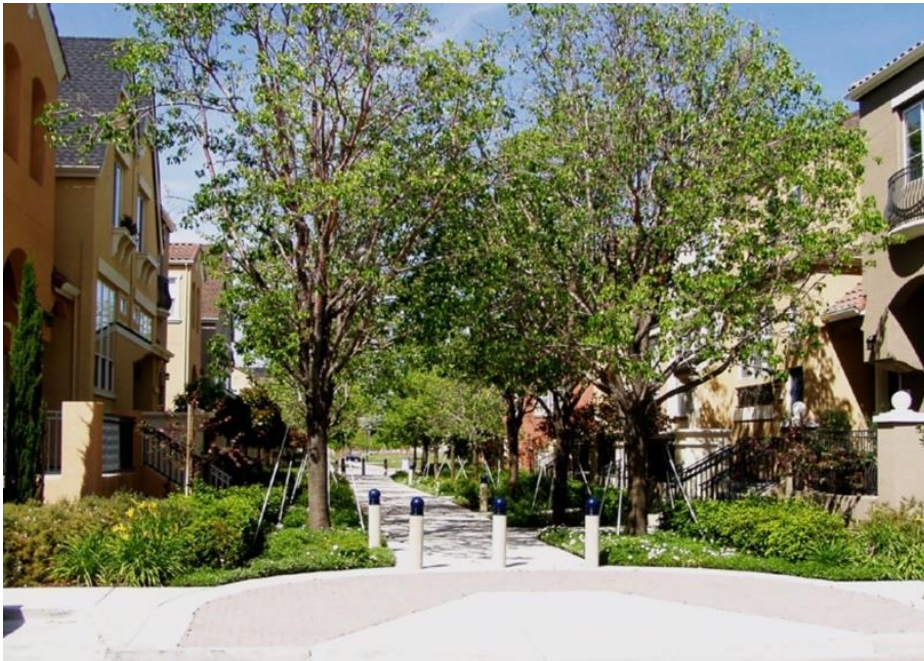
⁵Soil at tree wells needs to be loosened where subgrade has been compacted so tree roots have good amended soil to grow. They also need to have a watering tube that goes down about 3 feet to provide water lower down to encourage deep root growth. Include a condition of approval requiring monitoring of trees for 5 years, and rehab of the site with a replacement tree for those that are not thriving after 5 years.

- 3) Parking lots shall be located to the rear or interior of the block and shall not be located between the sidewalk and the building frontage facing the street.
- 4) Access to parking lots or structures shall be located along side streets or alleys.
- 5) Parking lots should be made of permeable pavement where subsoil conditions permit.

Respectfully yours,



Gita Dev, FAIA, Co-Chair Sustainable Land Use Committee
Sierra Club Loma Prieta Chapter
Cc: James Eggers, Chapter Director
Gladwyn d'Souza, Chapter Conservation Chair



EXAMPLE: LANDSCAPED
PEDESTRIAN STREET



EXAMPLE: LANDSCAPED PASEO



EXAMPLE: LANDSCAPED
SIDEWALK SETBACK



EXAMPLE: LANDSCAPED
COURTYARD



EXAMPLE: BUILDING SETBACK FROM SIDEWALK WITH LANDSCAPED MID-BLOCK COURTYARD



SAN MATEO, SANTA CLARA & SAN BENITO COUNTIES

August 4, 2023

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

Attn: Laura Richstone
Associate Planner | Community Development Department
lrichstone@cityofsanmateo.org

Re: Draft Objective Design Standards

Ms Richstone,

We have reviewed the draft objective Design Standards and are disappointed by Section 3- Site Planning and Section 5 - Landscaping. On March 6, 2023, we sent the Planning Commission a letter outlining our concern that the approach to ODS in most Peninsula cities, including San Mateo, seems to be heavy on how "attractive" and "articulated" the buildings are and how much they will contribute to the Regional Housing Needs Assessment (RHNA) goals, **but short on strong requirements for green open spaces**. We asked that the letter be forwarded to the planning staff members working on the ODS requirements so you should have received a copy. We apologize if you did not.

We have attached a copy of our March 6, 2023 letter.

While we recognize that there are conflicting needs for open space versus space for housing, quality of life for residents, as well as the City, are critical in designing these Standards. **Urban trees and greenery have been shown to be important for mental health for all ages** as well as for biodiversity. Where space is tight, trees provide welcome relief and high density areas should not be shortchanged on urban canopy.

Our concerns are listed here:

Section 3 - Site Planning

- Para. 3.1.1,A,A & A,B. the minimum size of the public "plazas" in the draft are much too small. A 10'X10' space is not a plaza. We recommended in our letter that there be a minimum of 15% of the total gross development as common open space and that 50% of that be accessible to the public, and the minimum dimension of a plaza or courtyard be 30' with 50% of the area to be green landscaping. We also recommend trees in as many locations as feasible because they add so much beauty, shade, and environmental benefits to an outdoor space.
- Para. A,D. The draft states that if building is < 150', no plaza is required. If a plaza is not required, we would like to see at least a landscaped 10' deep building front setback to include greenery to soften the look of the building from the street and provide relief for the sidewalk and possibly space for public

seating in a landscaped area (except in the downtown core where retail faces the sidewalk, the new facade should align with adjacent facades).

Section 5 - Landscaping, Open Space, and Exterior Lighting

- Para. 5.1.1,A,A-E. It's not clear that any mix of the three alternatives would still require 50% minimum green landscaping. For example: Alternative B, D, and E could all be met with just hardscaping. Please clarify to ensure that green space is included.
- Para. 5.1.1,C, Common Open Space. The character of the open space is not defined (except for dog runs). How much should be green? How much hardscape? Please refer to our letter, Para. 1.
- 5.2.1. Lighting in the City has become a source of increased concern as biodiversity plummets as a result of light at night. The lighting requirements are good as far as they go, but please refer to Para. 1,9) in our letter where we also include further criteria that would be helpful to include.

The details that you are putting into these Objective Design Standards are of seminal importance and will shape the City and its quality of life for many decades. We look forward to your considering our suggestions as you finalize these very important guidelines.

Respectfully yours,

A handwritten signature in black ink, appearing to read "Gita Dev", with a horizontal line underneath.

Gita Dev, FAIA, Co-Chair Sustainable Land Use Committee
Sierra Club Loma Prieta Chapter

Cc: San Mateo Planning Commission
James Eggers, Chapter Director
Gladwyn d'Souza, Chapter Conservation Chair
Ken Abreu, Sustainable Land Use Committee

Attachment: Sierra Club letter on Objective Design Standards, dated March 6, 2023



SAN MATEO HERITAGE ALLIANCE

June 6, 2023

TO: Manira Sandhir, Planning Manager and Zoning Administrator

CC: Christina Horrisberger, Community Development Director
Zachary Dahl, Deputy Community Development Director
Drew Corbett, City Manager
Kathy Kleinbaum, Assistant City Manager
Prasanna Rasiah, City Attorney

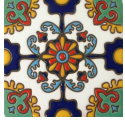
FROM: San Mateo Heritage Alliance

SUBJECT: New development projects in and around Downtown

Dear Ms. Sandhir,

San Mateo Heritage Alliance would like to schedule a meeting with Planning and Community Development to discuss the following concerns regarding development projects in Downtown:

1. We have noticed that most projects proposed in and around Downtown appear to share similar design characteristics that diverge from established building patterns.
2. We have noticed that developers appear confused and conflicted by the design guidance and their muddled design proposals reflect that confusion and conflict.
3. We are concerned that the truly important issues of contextual responsibility and urban continuity are not being addressed.
4. We are concerned that absent traditional characteristics and consistent patterns that define urban commercial architecture, the intended compatibility with the historic Downtown core will not be achieved.
5. We ask that development projects proposed for the greater Downtown area be reviewed by qualified historic preservation architects for design compatibility and contextual continuity.
6. We ask that qualified historic preservation architects experienced in writing design guidelines for Downtowns and historic districts, be engaged to prepare new design guidelines for Downtown San Mateo.
7. We ask that planning staff consult Redwood City's 2011 Downtown Plan which provides a good model for appropriate architectural character types and styles.
8. We are concerned that if the current process continues without intervention, the result will be - as the city's Alternative Analysis warned - "development incompatible with the existing historic fabric surrounding the Downtown Historic District." It is an outcome no one wants.



SAN MATEO HERITAGE ALLIANCE

June 6, 2023

Downtown possesses a diversity of building types and architectural styles spanning over a hundred years. Yet the myriad of buildings proposed for Downtown lack the necessary style references to the rich architectural context of the Downtown environment. All share a disconcertingly similar appearance that challenges the very meaning of compatibility with the established Downtown character, predominant building typology, and architectural pattern of development.

San Mateo Heritage Alliance remains committed to working with the City of San Mateo to ensure and encourage new development that is compatible and complimentary to the Downtown Historic District.

We would welcome the opportunity to meet soon, perhaps in the next couple of weeks, to discuss our concerns and offer our input and assistance in helping to craft regulations that meet contemporary needs while strengthening Downtown's historic sense of place.

We will call you in a few days to set a meeting date. Thank you.

Sincerely,

San Mateo Heritage Alliance

Keith Weber, Aragon

Dianne Whitaker, North Central

Laurie Watanuki, Central

Mike Nash, Baywood

Attachments:

Appendix A: Issues of Concern

Appendix B: Proposed New Construction in a Historic Context

Designing in context means providing enough visual linkages between existing buildings and a proposed project so as to create a cohesive overall effect. The new building should strengthen and enhance the characteristics of its setting.

**- Richard Hedman,
*Fundamentals of Urban
Design***



Appendix A Issues of Concern

Compatibility and Typology

Downtown San Mateo has a wide variety of architectural styles and building typologies that provide the setting and establish the context for new development. The Downtown Specific Plan and Downtown Design Guidelines direct new development to be “compatible” with the existing building fabric.

Main Streets and commercial Downtowns nationwide are all recognizable and familiar to us because they share a set of common typological characteristics and compositional vocabulary. They are formally consistent, stylistically diverse, and able to accommodate functional change. In his seminal book, *The Buildings of Main Street: A Guide to American Commercial Architecture*, noted architectural historian Richard Longstreth traces the evolution of the compositional vocabulary used in every American Main Street over the past two centuries and presents a method of identifying building characteristics commonly found in central commercial districts up to the mid-20th century. In so doing, Longstreth helps us understand how to make planning decisions shaped by historical perspective rather than current aesthetic preference.

Architectural Style and Unified Design

Successful and enduring buildings generally have one unified architectural style that integrates the entire building in one harmonious composition. The proposed projects, however, disregard this practice, giving the upper floors a completely different design appearance than the lower floors. The effect is one of confused discord rather than unity and harmony.

Redwood City has addressed the issue of creating architectural character in new projects compatible with the established architectural patterns in their Downtown by creating architectural “Character Zones.” Within these zones, different “Character Types” - Neoclassical, Victorian, Craftsman, Mediterranean, Art Deco, and Contemporary are permitted.

These Architectural Character Types are intended to reinforce both the predominant eclectic nature of building fabric in the Downtown area, and the strong preferences for an appropriate aesthetic for all new buildings and development. SMHeritage believes this type of approach is appropriate and would like to encourage its use in Downtown San Mateo to help ensure that new development is compatible and complementary to the historic resources.

Massing

Massing, more than any architectural detail, has the most impact on the eye. Consequently it is one of the most important design considerations. The multiple masses and volumes of most of the proposed projects, however, read like an assortment of different size shipping boxes rather than unified architectural compositions.



Building Corners

Generally, buildings in an urban context should maintain a consistent street wall along their street frontages. Corner towers and recessed corner entries are widely used to emphasize the corner of a building at specific intersections and to capture pedestrian traffic. But to eliminate the corner altogether, or replace it with a multi-story glass box as some of the projects do, does more to diminish the streetscape and urban experience than to enhance it.

Daylight Plane

Building heights in Downtown San Mateo vary from one story to twelve, and in the Historic District from one to nine stories. Street wall frontages for virtually all existing buildings rise up to full height without setbacks. Yet, the daylight plane requirement for the entire retail core limits the height of the street frontage to one half the street width - generally two to three stories - regardless of the prevailing street wall pattern and varied building height allowance of 55 to 75 feet. This seems to be a one-size-fits-all requirement that could be adjustable and tailored to differing established building patterns in different parts of Downtown.

One successful infill project within the Historic District is 101 Ellsworth, rising six stories without an upper level setback, suggesting that upper floor setbacks may not be the only solution for new construction in and around the Historic District.



101 Ellsworth

Examples of Compatible Downtown Infill Projects

Four examples of compatible new infill construction are recognizable in Downtown: Century Movie Theater, the Transit Center, the Main Street Parking Garage and 101 Ellsworth. They achieve their compatibility primarily because they conform to established commercial building typologies and draw on recognizable architectural styles. Inspiration for the new work came from Mediterranean Revival and Art Deco styles popular during the 1890-1950 Historic District period of significance, yet the design of each building was interpreted in a contemporary way and meets contemporary needs.



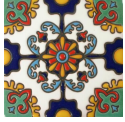
Transit Center/Train Station



Century Movie Theater



Main Street Parking Garage



Appendix B Proposed New Construction in a Historic Context

What is the inspiration behind some of the new infill projects proposed for Downtown? Do they conform to familiar commercial building typologies? Do they reflect historical precedents and patterns of development? Do they draw on known architectural styles familiar to and popular with the public? Are they respectful to the surrounding community? Are they worthy of being landmarks themselves in 50-100 years? Although there are at least a dozen or more projects that cause us concern, we think the eight examples discussed below are sufficient to convey our point.

* * *

Paste-on Parody

Located just east of the railroad in the Downtown support area, Block 21 and 3rd & Claremont seem to find inspiration in a controversial preservation technique known as facadism. Facadism is sometimes used to construct a new building behind a historic facade. In successful examples, the new building is completely hidden behind the old facade. That is not the case here.

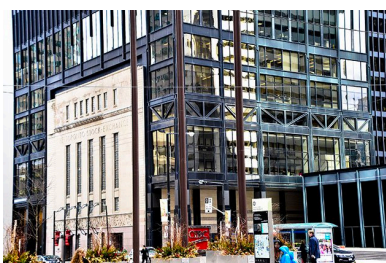
Neither design acknowledges the established pattern of providing changes to the street fronting facade every 25 to 50 feet as advised in the Downtown Design Guidelines. Neither reflects the essential typological or stylistic patterns prevalent in the greater Downtown. The question is where did the developer get the idea these designs would be acceptable or welcomed by the surrounding community.



3rd & Claremont



Block 21



Facadism



Facadism



SAN MATEO HERITAGE ALLIANCE

June 6, 2023

Cornerless Brick Warehouses

Three projects - 31-57 S. B St. (abutting the Historic District), 405 E. 4th Ave., and 222 E 4th Ave - seem to draw their inspiration from brick warehouses and factories that proliferated during the mid-19th century at the height of the industrial revolution. Popular in the mid to late 1800s, they were generally constructed in the industrial areas of cities, not the Downtown commercial core of urban centers which featured retail shops, mercantile and business offices.

Although sometimes brick cladding may be the appropriate material, and a few of the oldest Downtown buildings are brick, the use of brick does not necessarily equate to compatibility with the Historic District where concrete, stucco, wood and terra cotta were often used. There are some pleasing aspects to all three projects, but because most of the buildings in the Historic District were built after 1900, and the majority of those in the 1920s-30s, the appropriateness of this mid-nineteenth century industrial building type for Downtown is subject to debate. Notably, all three projects have discarded their building corners, something any respectable warehouse would never do.



31-57 S. B Street

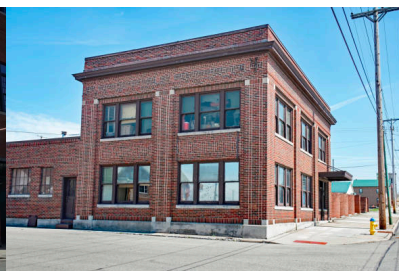
405 E. 4th Ave.



222 E. 4th Ave.



Brooklyn Navy Yard,



Brick Warehouses c 1860 - 1890s





SAN MATEO HERITAGE ALLIANCE

June 6, 2023

Muddledment

Bespoke in the Downtown retail core, and Block 20 in the Downtown support/Gateway area, are both head scratchers. Block 20 has an intriguing upper level, but it has no design connection to the lower floors. Why the upper level design doesn't continue all the way to the street is vexing. The 3-story glass corner interrupts the continuity of the street wall, eliminating what would normally be a prominent visual anchor for the building. Firehouse Square in Belmont is a good example of what this project should be.

Located one block from the Historic District, Bespoke appears to be a bundled collage of shapes, forms, wild ideas and conflicted energy. One section resembles an open parking garage, another looks like an elongated version of Philip Johnson's glass house perched atop two brick warehouses separated by a 3-story glass divider. Both proposals are so muddled it is impossible to guess what they are trying to do.



Block 20

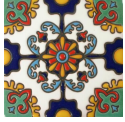


Firehouse Square, Belmont



Bespoke





SAN MATEO HERITAGE ALLIANCE

June 6, 2023

Missed Opportunity

The only project within the Historic District, 180 E. Third Ave. makes a good faith effort to find compatibility. It appears to be inspired by, and tries with insufficient guidance or direction, to follow the lead of the National Bank of San Mateo, a 1925 Greek Revival design by W. H. Weeks. The new building, currently under construction, has pilasters, a classical entablature and some nice brick detailing. But this is where the compatibility appears to end. The familiar symmetrical tripartite facade composition and prominent central entry that define this building type and style has been lost, and much of the compatibility along with it.



180 E. Third Ave.



National Bank of San

Like all the other buildings proposed for Downtown, it is not one building but two - one anchored to the ground and the other, a different design and composition, setting awkwardly on top. One wonders why this project did not draw its inspiration from the 5-story National Register eligible 1929 E.L. Norberg Medical Arts building diagonally across the street. A missed opportunity, this project could have and should have been better.



Once the unity of an area is damaged by an ill-considered project, decades may pass before the error can be redressed. Once compromised, the area's ability to fend off subsequent attacks upon its design integrity is weakened.

- Richard Hedman,
Fundamentals of Urban Design



Aug 8, 2023

City of San Mateo
330 W 20th Ave
San Mateo, CA 94403

By Email: PlanningCommission@cityofsanmateo.org

CC: CityAttorneysOffice@cityofsanmateo.org, clerk@cityofsanmateo.org

Re: Draft Objective Design Standards for Multi-Family and Mixed-Use Residential Developments

Dear Planning Commission,

The California Housing Defense Fund (“CalHDF”) submits this letter to remind the Commission of its obligation to abide by all relevant state laws when reviewing the proposed Objective Design Standards for Multi-Family and Mixed-Use Residential Developments (the “proposed standards”), calendared as a study session, agenda item 2 at tomorrow night’s meeting. Specifically, the City must comply with the Housing Crisis Act of 2019 (SB 330), Senate Bill 9 (“SB 9”), and other state housing laws. The proposed standards as currently drafted do not adhere to these laws: many of them fail to articulate objective standards.

SB 330 bars cities from “[i]mposing or enforcing design standards [...] that are not objective.” (Gov. Code § 66300, subd. (b)(1)(C).) SB 9 allows cities to impose “objective zoning [...] subdivision [...] and [...] design” standards (but not subjective standards) on SB 9 projects. In addition, the Housing Accountability Act (HAA) renders non-objective standards unenforceable in most circumstances. (See *California Renters Legal Advocacy and Education Fund v. City of San Mateo* (2021) 68 Cal. App.5th 820, 839-44 (overturning city’s denial of housing project based on design guidelines requiring “a transition or step in height” where a building is more than one story taller than its neighbors on the grounds that it was not objective).) SB 330, SB 9, and the HAA define “objective” as “being uniformly verifiable by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant or proponent and the public official.” (Gov. Code § 65589.5, subd. (h)(8); Gov. Code § 66300, subd. (a)(7); *see also* Gov. Code § 65852.21, subd. (i)(2) [similar language]; Gov. Code § 66411.7, subd. (m)(1) [similar language].)

360 Grand Ave #323, Oakland 94610
hi@calhdf.org

Unfortunately, several provisions in the proposed Ordinance fall short of this requirement. CalHDF urges the Commission to carefully review all the proposed standards for objectivity and specifically points out a few of the most egregious examples:

- Section 4.6.2 “All windows shall include detailing using at least two (2) of the following approaches consistent with the selected architectural style.” The phrase “consistent with the selected architectural style” is not objective. Overall styles are not cleanly defined, and what counts as “consistent” or inconsistent with the building’s style is in the eye of the beholder. An applicant cannot know ex ante and with certainty whether their proposed design will satisfy the ordinance, and thus the ordinance is unenforceable on this point.
- Section 4.7.1 (A) “Colors: Neon colors shall be prohibited. Colors of the same color palette shall be differentiated by at least three shades.” It is not clear what counts as “the same color palette” or “three shades.” The City must draft more specific language before it can impose such rules on applicants.
- Section 4.8 (A) “Additions to existing structures shall: Be of the same architectural style as the existing building(s)” Compatibility within a style is not an objective standard, as it cannot be applied uniformly. Architectural styles, and their materials and design details, are subjectively defined and therefore cannot be enforced by the City.
- Section 7.2.3 “The visible portion shall be architecturally treated beginning at the building corner of the façade with the continuation of the same colors and materials, including a matching width and depth of structural bays used on the building facade.” The definition of “architecturally treated” is unclear and ambiguous, thus unenforceable without clarification as to that definition.

CalHDF appreciates San Mateo’s effort to review and establish objective residential standards. We remind the City, however, that it must take care to follow the law in doing so. The current proposal needs at least a few revisions before it can be finalized and implemented in accordance with state law.

CalHDF is a 501(c)3 non-profit corporation whose mission includes advocating for increased access to housing for Californians at all income levels, including low-income households. You may learn more about CalHDF at www.calhdf.org.

Sincerely,



Dylan Casey
CalHDF Executive Director



Courtney Welch
CalHDF Director of Investigations and Enforcement

-----Original Message-----

From: Francie Souza [REDACTED]

Sent: Tuesday, August 8, 2023 3:37 PM

To: Planning Commission <PlanningCommission@cityofsanmateo.org>

Subject: ODS comments

Planning Commission -

I am a resident of San Mateo and have the following comments to make regarding the draft of the Objective Design Standards:

- Take cues from existing buildings in our downtown historic district, and adjacent neighborhoods - Demolition permits should not be issued before building permits -There should be a transition zone between single family residences to higher-density housing. Townhomes can provide a good transition. Having 5-7 story buildings next to single family homes presents many problems.
- Please preserve and protect our smaller homes and duplexes between 4th & 5th street, many of which are craftsman and pre-war era. These provide great options for medium and lower income families - Include visual samples of architectural styles in the ODS -Please preserve historic homes and trees as much as possible - they can't be replaced!

Overall, I'm asking for our city planners to respect and support the existing community character of San Mateo.

Sincerely,

Frances Souza