



San Mateo, Santa Clara & San Benito Counties

September 6, 2022

Mayor Bonilla and Members of the City Council
City of San Mateo
330 West 20th Avenue
San Mateo, CA 94403

Via email: citycouncil@cityofsanmateo.org

Subject: Comments on Draft General Plan Goals, Policies, and Actions, July 2022

Dear Mayor Bonilla and Members of the San Mateo City Council and Planning Commission,

The Sustainable Land Use Committee of the Loma Prieta Chapter of the Sierra Club (SLU) advocates on land use issues in San Mateo and Santa Clara Counties. Thank you for providing the opportunity for SLU to provide input on the Draft General Plan Goals, Policies, and Actions, July 2022.

The overall draft is a good start, but there is still opportunity for improvement. SLU has previously commented on the evolving General Plan (GP) in three major letters (May 13, 2021, February 16, 2022 and April 26, 2022). We ask that you review those letters as they all make significant comments on the GP. In this letter we will highlight the most important themes from our earlier letters, with comments on five chapters (2, 3, 4, 6 and 8). The attachment to this letter will comment specifically on the certain goals, policies, and actions in the draft.

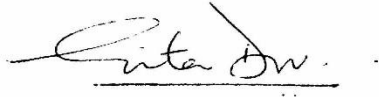
Major Themes

1. The lack of housing, particularly affordable housing, is a major crisis and needs to be strongly addressed. Much higher housing density is needed, particularly within ½ mile of transit. See our Guideline for Downtown and Station Area plans (<https://www.sierraclub.org/sites/www.sierraclub.org/files/sce-authors/u4142/D-SAP%20Guidelines%20Rev%2010-14-19.pdf>)
2. The changes envisioned by the GP need to use this opportunity to green the city. The GP needs to pursue Green Streets, more parks/open space, and more pedestrian and bike paths. See our Guidelines on Green Streets (<https://www.sierraclub.org/sites/www.sierraclub.org/files/sce-authors/u4142/Green%20Streets%20Presentation%20-%201-20-21%20DC.pdf>)
3. The GP needs to more clearly advance concepts to make more neighbors compact and walkable. This includes the 15-minute neighborhood and Barcelona “superblocks” concepts.
4. Resilience and Sea Level Rise need to be fully planned for and should emphasize nature -based approaches for adaptation to rising sea levels and flooding.

In the following attachment we provide specific comments to the Goals, Policies and Actions.

We ask that you consider these comments as you refine and finalize the GP.

Respectfully Yours,

A handwritten signature in black ink, appearing to read "Gita Dev", is written over a horizontal line. The signature is fluid and cursive.

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

Cc: James Eggers, Executive Director, Sierra Club Loma Prieta Chapter
Gladwyn d'Souza, Conservation Chair, Sierra Club Loma Prieta Chapter

Specific Comments on Draft General Plan Goals, Policies, and Actions - July 2022

Below are specific comments on Chapters 2, 3, 4, 6 and 8:

- a. Suggested additions are in ***italics and bold***, suggested deletions are ~~struke through~~.
- b. We also list those items that we feel are particularly important to include

Chapter 2 Land Use.

1. Make Goal LU-1 much stronger and focused on addressing the housing crisis, suggested rewording:

Plan carefully for orderly growth that, ***with a high degree of certainty, fully*** provides ample for the housing and job opportunities for all citizens, maximizes efficient use of infrastructure, limits adverse impacts to the environment and improves social, economic, and health equity.

2. Modify Policy LU-P1.3 to emphasize housing in mixed use development. Suggested rewording:

Policy LU-P1.3 Mixed-Use. Encourage mixed-use developments to include a strong residential component provide greater proximity between jobs and housing, promote pedestrian activity, and reduce traffic congestion. ***Any office space in Mixed Use should be for local uses, by people in San Mateo County and not for corporate offices.***

3. Policy LU-P2.3. Building Height and Density

This item was left open for suggestions. Increased density is a way to help assure the needed housing gets built and will allow for more walkable communities with amenities nearby. Allowing more height is a way to create more open space for green streets, parks, etc.

Suggested wording: ***Utilize higher density (e.g., up to 50-200 units per acre) in areas near the train stations and along El Camino Real (ECR). Also allow increased height (6-10 stories) in the areas near train stations and along ECR.***

4. Policy LU-P2.4. Building Intensity

This item was also left open for suggestions. But it is not clear what Building Intensity means. Perhaps the suggestion above on density and height addresses intensity.

5. Policy LU-P4.1 Downtown Land Uses

This is an important Policy to retain as proposed below:

Allow and encourage a wide range of residential, office, medical, dining, entertainment, and retail uses downtown, at high intensities and densities, with strong connectivity to the San Mateo Caltrain station and other transit.

6. Action LU-A4.1 Downtown Area Plan

This is an important Policy to retain as proposed below:

Update the Downtown Area Plan to support and strengthen the Downtown as a vibrant and active commercial, cultural and social district. The updated Downtown Area Plan shall align with the General Plan, integrate recommendations from other concurrent City efforts, focus growth and intensity in proximity to the Caltrain station, update parking standards and parking management strategies, allow for increased housing units and density, and support high quality pedestrian-oriented design and architecture.

7. Goal LU-6 is very important, as are the Policies and Actions below it. All should be retained as listed below:

Goal LU-6: Promote transit -oriented development around Hillsdale Caltrain station

Policy LU-P6.1 Rail Corridor Transit-Oriented Development Plan (Corridor Plan). Implement the Corridor Plan to allow, encourage, and provide guidance for the creation of world class transit-oriented development (TOD) within a half-mile radius of the Hillsdale Caltrain station area, while maintaining and improving the quality of life for those who already live and work in the area.

Policy LU-P6.2 Hillsdale Shopping Center. Allow redevelopment of the Hillsdale Shopping Center for a mix of uses, including commercial, retail, office, hotel, and residential uses. Require preparation of a Master Development Plan to ensure the site is developed comprehensively and provides appropriate transitions to the adjacent neighborhoods.

Action LU-A6.1 Hillsdale Station Area Plan. Update the Hillsdale Station Area Plan to foster higher density residential and mixed-use, transit-oriented development that connects to neighborhoods to the east and west, improves bicycle and pedestrian circulation and adds park and open space areas.

8. Modify Goal LU-13 to include seeking to reduce the costs and time to develop affordable housing. Suggested changes below:

Goal LU-13

Maintain Development Review and Building Permit processes that are comprehensive and efficient **and seek ways to responsibly reduce the costs and time to develop affordable housing.**

Chapter 3: Circulation

1. Make Policy C-P1.2 to be broader and include Green Streets. Modified below:

Policy C-P1.2 Complete Streets. Apply complete streets design standards to future projects both in the public right-of-way and on private property. Complete streets are streets designed to facilitate safe, comfortable, and efficient travel for all users regardless of age or ability or whether they are walking, bicycling, taking transit, or driving. ***Complete streets should include a network of “slow and safe streets” with priority for the safety of pedestrians, bicycles and micro mobility, where auto traffic is slowed, and which includes green landscaping and shade trees as well as green street stormwater infrastructure to reduce runoff and pollution.***

2. Policy C-P1.4, Policy c-P1.6 and Action C-A2.7 are important to implement

Policy C-P1.4 Prioritize Pedestrian and Bicycle Mobility Needs. Prioritize pedestrian and bicycle mobility, connectivity, and safety when designing roadway and intersection improvements. ***Include “Vision-Zero” as a goal to reduce fatalities and accidents with pedestrians and bicyclists.***

Policy C-P1.6 Transit-Oriented Development. Increase access to transit and sustainable transportation options by encouraging high density mixed-use transit-oriented development near the City’s Caltrain stations and transit corridors.

Action C-A2.7 Unbundled Parking. Encourage residential developments to unbundle the costs of providing dedicated parking spaces. Encourage additional parking capacity created by unbundling to be reallocated as shared or public parking spaces.

3. Goals C-3, C-4, C-5, and C-8 as well as Action C-A3.1 are particularly important to implement.

Goal C-3: Build and maintain a safe, ***shaded (with street trees)***, connected, and equitable pedestrian network that provides access to community destinations such as employment centers, transit, schools, shopping and recreation.

Goal C-4: Build and maintain a safe, connected, and equitable bicycle and micromobility network that provides access to community destinations such as employment centers, transit, schools, shopping, and recreation.

Goal C-5: Make transit a viable transportation option for the community by supporting frequent, reliable, cost-efficient, and connected service.

Goal C-8: Build a values-driven regulatory, management, and partnership framework that flexibly encourages emerging transportation technologies in service of City and community goals.

Action C-A3.1: Implement Pedestrian Improvements. Implement goals, programs, and projects in the City’s adopted plans that improve the comfort, safety, and connectivity of the pedestrian network.

Chapter 4: Housing- see end of this letter

Chapter 6: Conservation, Open Space, Parks and Recreation

1. Several Goals are particularly important implement: COS-1, COS-2, COS-3, COS-8, COS-9

COS-1: Protect and enhance the City's natural resource areas that provide plant and animal habitat and benefit human and ecological health and resilience.

COS-2: Ensure that current and future generations will enjoy the environmental, social, health, and economic benefits derived from access to our urban forest, parks and open spaces.

COS-3: Protect and improve San Mateo’s creeks as valuable habitat, green infrastructure, and components of human and environmental health. ***Provide adequate creek setbacks given greater anticipated storm events as well as sea level rise.***

COS-8: Provide equitable and convenient access to parks, recreational programs, and facilities so that all residents experience the benefits of parks and open space on their physical and mental health.

COS-9: Provide the appropriate mix of parks and facilities that balances the needs of active and passive facilities, allows formal and informal uses, is accessible for all residents, and meets existing and future recreation needs.

2. Modify Policy COS-P3.5 and COS-P3.6 to strongly encourage the improvement of the creek habitats for San Mateo Creek and for Laurel Creek.

San Mateo Creek is in an area that is targeted for redevelopment in both the Downtown and Shoreview area. Laurel Creek is in the Hilldale redevelopment area. Both are now mostly concrete lined ditches. Any development will provide the opportunity to get the creeks back to a natural setting and provide the opportunity for plants, fish, insects and animals in the creek and restored riparian areas. This would provide new valuable open space and parks for people as well. And this will be an educational opportunity for children of San Mateo to see the creek environment in a natural setting. See suggested modifications below:

Policy COS-P3.5 Hydrologic Impacts. Ensure that improvements to creeks and other waterways do not cause adverse hydrologic impacts or significantly increase the volume or velocity of flow of the subject creek. ***The priority will be to use nature-based improvements to reduce hydrologic impacts.***

Policy COS-P3.6 New Creekside Development Requirements. Require that new creekside development protect and improve setbacks, banks, and waterways adjacent to the development project in order to increase flood protection, enhance riparian vegetation and water quality. ***This will be a particular focus for Laurel Creek near Hilldale Mall and San Mateo Creek in Shoreview and Downtown.***

3. Policy COS-P9.2 and COS-P9.3 are particularly important to implement. And allowing higher building height will make implementation more likely since more open space will be available.

Policy COS-P9.2 Acreage Standards. Acquire or accept for dedication two acres of neighborhood and community parks per 1,000 residents.

Policy COS-P9.3 Walkable Parks and Amenities. Provide accessible public park or other recreational opportunities that are within approximately 1/3 of a mile of residents without travel over significant barriers. Ideally, one or more of the following amenities should be available: multi-purpose turf area, children's play area with pre-school and youth apparatus, seating areas, picnic areas, a multiuse court, and an opportunity for passive enjoyment of an aesthetic landscaped space.

Chapter 8: Safety

1. Goal S-4 is particularly important implement as are Actions S-A4.5 and S-A4.6. These actions fit with the earlier comments to use the redevelopment around Laurel Creek and San Mateo Creek to restore natural features that will help protect against sea level rise.

Goal S-4

Develop regionally coordinated sea level rise adaptation measures and programs.

Action S-A4.5 Natural Infrastructure. Use or restore natural features and ecosystem processes where feasible and appropriate as a preferred approach to the placement of hard shoreline protection when implementing sea level rise adaptation strategies.

Action S-A4.6 Removal of Hard Infrastructure. Remove existing shoreline or creek bank protective devices when the structure(s) requiring protection are redeveloped, removed, or no longer require a protective device.

Chapter 4: Housing: Our letter of April 26th 2022 commented on the draft Housing Element and so our comments are still as noted in that letter

However, we would like to make some **additional suggestions here** on possible mechanisms that the city could utilize to better assure that more affordable housing will be built:

1. Do not upzone and give away any aspects of any revisions to the zoning code by right, but instead trade increased zoning density and benefits for significant community benefits - the topmost which should be affordable housing. This can be done by establishing a base density below what is generally desired while instituting a local density bonus scheme which encourages zoning increases, and benefits above State density bonus law in exchange for substantial community benefits. This was an effective approach in Millbrae during Millbrae's review of the BART Station Area Plan.

Upzoning by right without any off-setting limitations will only increase the cost of land for both for-profit and non-profit developers which will translate into even more expensive housing in residential-zoned areas.

2. Do not establish specific maximum density limits for any multi-family residential project, but instead let the density of each project be determined by objective design standards using a form-based code and vetting and approval of all community benefits proposed by the developer. This allows for a wider variety of unit types from micro-units and SROs to family and luxury units. It also allows for greater flexibility in determining the most valuable community benefits.

3. Require all new office building and R&D developers to present a plan to the city indicating how the developer will aid the city in supporting the amount of new housing construction needed to house any net increase in new employees. This could be in the form of **substantial** financial set asides for new housing, or actually building enough new housing on or off-site, but the goal must be to strive for a reasonable jobs / housing balance within the city. It's important to link commercial development to the jobs/housing balance because, too often, cities accept in lieu fees or on or off-site new housing off-sets that are far too small to meet the anticipated need.

4. Add Transfer of Development Rights to the toolkit. Climate change is accelerating the displacement of people due to sea level rise flooding, wildfires, water availability, and extreme heat. Consider using Transfer Of Development Rights similar to the Syufi Theater site, East of 101, in Redwood City to increase density in safer receiving locations like downtown and reclaim land from sending areas for creating restored ecosystem to buffer the force of flooding with landward migrating wetlands and to reduce the risk of wildfire with rehydrated landscapes. Though FEMA picks up all liability from continuing to flood and burn out residents, planning for impacts, can return positive economic benefits to the city from resilient development, safety, and reduced disaster mitigation.

5. Consider micro grids as a resilient Community Benefit. Climate change is increasing health impacts to vulnerable populations with smoke intensity, power safety shutdowns, and extreme heat and water cutbacks requiring alternative power and water. Consider encouraging housing that incorporates

energy, waste, and water microgrids, that can provide resilient shared resources in the face of increasing health impacts and function within local distributed grids.

END