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MEMORANDUM

TO: Mayor Nagales, Vice Mayor Nicolas and Councilmembers

CC: Tony Rozzi (Chief Planner, City of South San Francisco), Ms. Christy Usher (Senior Planner, City of South San Francisco)

FROM: Doug Rich – Valley Oak Partners

DATE: August 9, 2022

SUBJECT: 170 & 180 S. Spruce Ave (Zoom Meeting on 8/12 at 1:00pm)

Mayor Nagales, Vice Mayor Nicolas and Councilmembers:

We have been closely following the new Zoning & General Plan Updates. It is abundantly clear that the City Staff has put in a lot of hard work in the preparation of these two documents. Our property in question is being considered for the “T3C” zoning in the new Form Based Code section of the Zoning update.

We have studied the package of documents that were presented to Planning Commission on June 16th and have a few comments regarding the new T3C zoning. Most of the comments below come from “Attachment 1e – Division III” and all questions revolve around T3C and the associated detail of this particular Zoning.

Item #1 – T3C Description vs T3C Density Range

The T3C summary page (on PDF page #5 of attachment 1e) clearly calls out a density range of 40-60 du/ac, as well as three allowed building types (Triplex/Fourplex, Rowhomes & Flex Low Rise). We believe the selection of these three building types make a lot of sense for this zone to help create a sensitive development adjacent to existing neighborhoods based on their transitional density ranges, height and massing styles.

However, these three building types would not be able to achieve the minimum density of 40 du/ac. Generally speaking, for a site that is not constrained by topography or shape, we find the average Rowhome density to be 15-25 du/ac. It appears the city concurs with this finding, as on the "Rowhome" summary page (on PDF page #14 of attachment 1e), it notes Rowhomes as *"typically providing 15-30 du/ac"*. We have seen attached Rowhomes that push into the high 20 du/ac, but these require a majority of the units having tandem garages, as well as being much narrower, less functional unit types.

Item #2 – Minimum Density vs. Allowed Building Heights

When we look at the three building types that are allowed in T3C, it seems infeasible for a Triplex/Fourplex or Rowhome to achieve 40 du/ac. The T3C "Maximum Height" is 50 feet, but Section 20.135.030 further reduces this maximum height to 3-3.5 stories (depending on Building Type). Again, we believe a minimum density of 40 du/ac with only 3-3.5 stories would not be achievable (from a design, parking & cost perspective).

Item #3 – Goals and Intent of the T3C Zone

It is clear from hearing Mr. Gross' detailed presentation to the Planning Commission and referencing back to some text from the Zoning Update document, that the City has attempted to take great care with respect to new development adjacent to existing Single Family Homes, in these Transect Districts via the Form Based Code.

Section 20.010.002 of the Title Zoning Districts, item (F) states, *"To promote the stability of existing land uses that conform to the General Plan, protecting them inharmonious influences and harmful intrusions"*

We believe that the intent and location of the T3C zone by the city makes a lot of sense, particularly in light of the single-story residential adjacent to much of Spruce Ave. However, the density range of 40-60 du/acre seems incongruous with this goal and can lead to incompatible forms and structures adjacent to the existing residential.

For example, at 40-60 du/acre allowed in the T3C zone, an owner/developer could utilize State Density Bonus Law by providing 18 affordable units at low income to achieve a 20% density bonus and construct 215 total units with eligible concessions and development standard waivers. This would result in a structure and building form as shown on Exhibit A of this Memo.

We believe that a density range of 15-25 du/acre would more appropriately support the transitional concept of the T3C zone while still achieving the City's housing goals.

Item #4 – Impact on Site Inventory List / City RHNA Unit Requirement

The city's Zoning & General Plan updates will be adopted in advance of the RHNA 6 Cycle, allowing the City to far exceed its required number of residential units in this upcoming 6th Cycle. The city's RHNA requirement is 3,956 units with a 20% buffer for a total of 4,747 units.

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PDF page #74 (of the city's draft Housing Element) shows the city has an "Excess Capacity" in its current Site Inventory List of the Housing Element of 9,153 units (over the RHNA requirement + 20% buffer). Given this unique excess capacity, the city could revise and lower the density range in the T3C area and not risk falling below the 4,747 unit RHNA benchmark. Lowering the T3C density would allow the construction of a product type more compatible with adjacent residential even after accounting for any density increases allowed by the State Density Bonus Law.

The new T3C Zoning is proposed for roughly 7 different areas of the City. Several of these areas are immediately adjacent to existing single-family homes.

S. Spruce Ave: There are approximately 12 contiguous acres of T3C Zoning along S. Spruce Avenue. The entire length of these 12 acres (roughly 1000 feet) all back up to existing single-family homes.

Hickey Blvd & El Camino Real: There are approximately 5 acres of T3C Zoning on the South side of Hickey Road where existing single-family homes are immediately adjacent.

Mission Rd & Holly Ave: There are approximately 2 acres of T3C Zoning where existing single-family homes are immediately adjacent.

Item #5 – Allowed Uses (Residential/Multifamily-Unit)

The "Uses in Transect Zoning Districts" (Table 20.135.060.B.1 on PDF page 36 of Division III) states that a residential multifamily-unit is "Permitted" in T3C, however there is a footnote of "P3". P3 states (w/respect to a residential use) *"Permitted on upper floors only; MUP required if located on the ground floor. MUP may only be approved if the Review Authority first finds that, based on information in the record, it is infeasible to locate any active pedestrian oriented use on the ground floor"*.

Requiring a commercial component to a Triplex/Fourplex or Rowhome development would further render the project unable to achieve the minimum 40 units per acre.

We appreciate your consideration of these matters and look forward to further dialog.
Sincerely,



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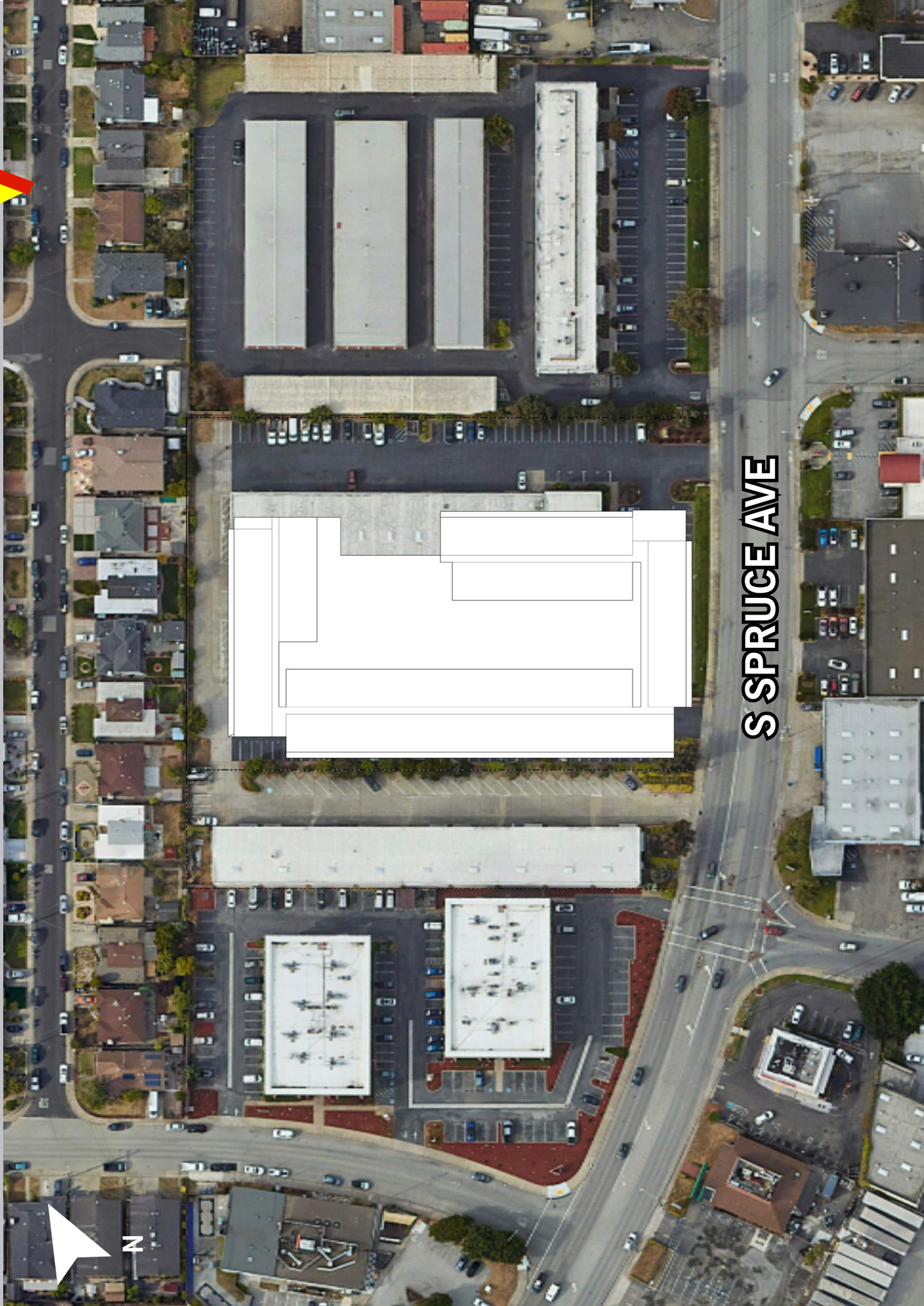
Cc: Scott Connelly



AERIAL PERSPECTIVE VIEW FROM NORTH

STUDY NOTES:

1. Assumes maximum General Plan density of 60 units per acre
2. Assumes 20% density bonus with waivers and/or concessions to allow flexibility in development standards such as building height, building type, and required parking
3. Multi-family residential building with +/- 215 units (179 base units + 36 bonus units), Includes 18 affordable units at low income
4. 6 story (+/- 72') building height
5. 40' rear building setback (with 5' balcony encroachment) adjacent to existing single family homes



170 & 180 S. SPRUCE AVE.

IN SOUTH SAN FRANCISCO, CA

RESIDENTIAL STUDY: DENSITY BONUS SCENARIO

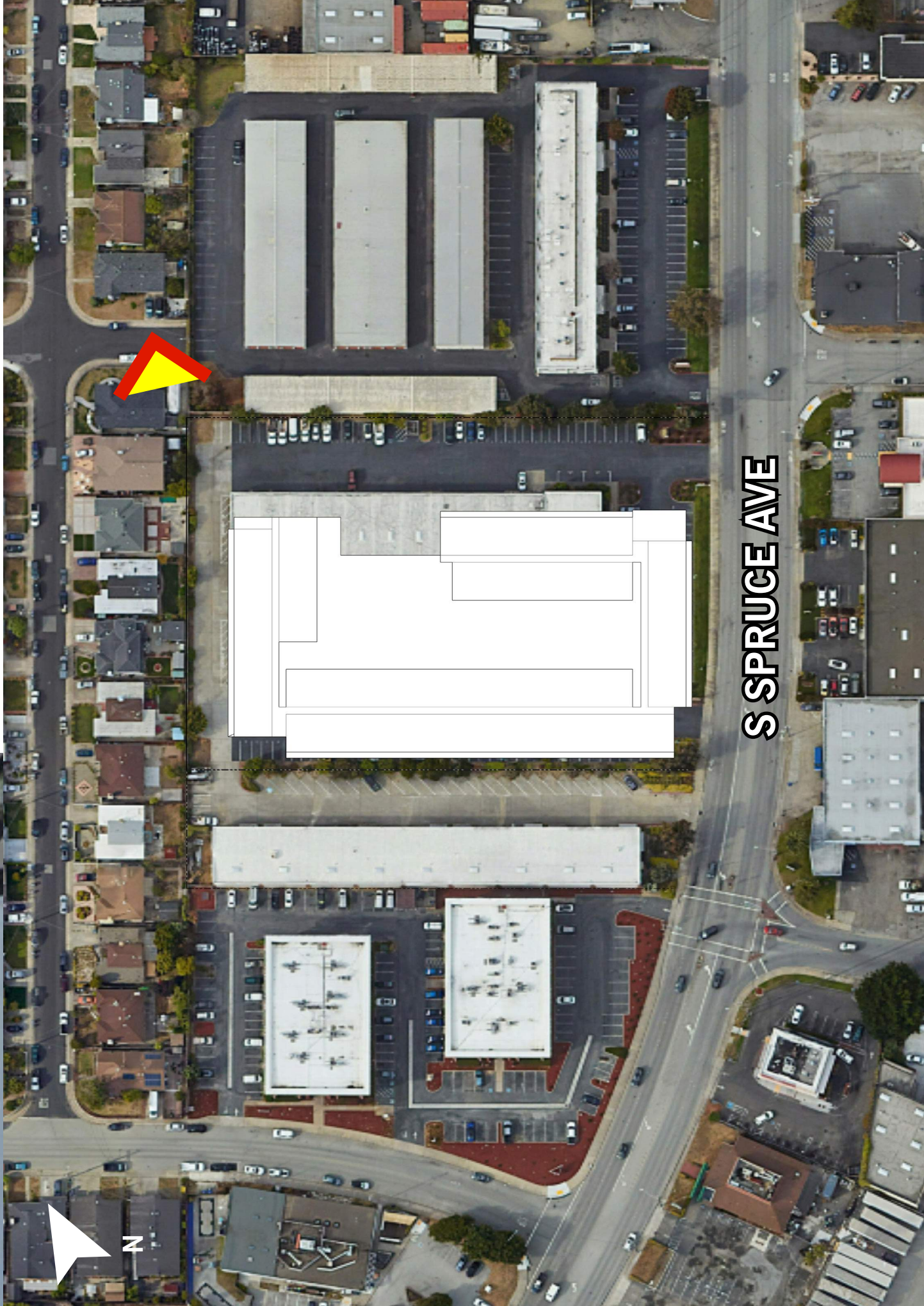
6 STORY PODIUM BUILDING (5 OVER 1)



PERSPECTIVE VIEW FROM REDWOOD AVE

STUDY NOTES:

1. Assumes maximum General Plan density of 60 units per acre
2. Assumes 20% density bonus with waivers and/or concessions to allow flexibility in development standards such as building height, building type, and required parking
3. Multi-family residential building with +/- 215 units (179 base units + 36 bonus units), Includes 18 affordable units at low income
4. 6 story (+/- 72') building height
5. 40' rear building setback (with 5' balcony encroachment) adjacent to existing single family homes



170 & 180 S. SPRUCE AVE.
IN SOUTH SAN FRANCISCO, CA

RESIDENTIAL STUDY: DENSITY BONUS SCENARIO
6 STORY PODIUM BUILDING (5 OVER 1)

