

City of South San Francisco Zoning Code Update

Stakeholder Interviews Summary Report

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Prepared for:

City of South San Francisco 400 Grand Ave South San Francisco, CA 94080

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INTRODUCTION

Part of the General Plan Update team led by Raimi and Associates, Lisa Wise Consulting, Inc. (LWC) is preparing the Zoning Code Update for the City of South San Francisco. The Zoning Code is the tool that will implement the new community-driven General Plan. A strong collaborative effort between stakeholders, community members, and decision-makers is essential to the Code update, and as the first of several community outreach events, LWC conducted interviews with key stakeholders. The interviews were intended to provide an insider's perspective of existing standards and identify community needs and priorities related to zoning, including uses, development standards, design, and procedural requirements.

The City identified and contacted 21 individuals as potential interviewees and 20 participated in the interviews. Included were residents, designers, real estate brokers, developers, and City Councilmembers. LWC conducted a total of 14 one-on-one or small group interviews (no more than three interviewees per group). Interviews were conducted on March 10, 11, 12, and 22, 2021 via Zoom videoconference.

Interviews were scheduled for 45 minutes each out of respect for respondents' time and to limit informant fatigue, and generally lasted 35 to 45 minutes. The interviews followed a list of 12 questions developed by LWC and reviewed and approved by the City (see below and Appendix). All interviews were initiated with a greeting and a brief: 1) introduction to the project, 2) description of intent of the interviews, 3) assurance of confidentiality, and 3) overview of the format and expected time commitment.

STAKEHOLDER RESPONSES SUMMARY

Respondents were all friendly, generous with information, and appreciative of the opportunity to be involved. All interviewees agreed to answer additional questions or comments and continue to work with the team on the project, indicating that the respondents valued the process and that the responses were candid and accurate. Following are summaries of the responses by question.

<u>Question 1</u>: What is your relationship with the City of South San Francisco? (Council, Commission, property owner, resident, business owner/operator, advocate, non-profit organization, etc.)?

Respondents included individuals who identified themselves as residents, planners, design professionals, developers, real estate professionals, affordable housing advocates, and local business owners or operators. Interviewees included members affiliated with the City Council, the School Board, the Chamber of Commerce, and the Design Review Board.

Question 2: We'd like to know about your experience using the code. What types of development are you involved with? What are the specific regulations with which you are most familiar?

Responses to this question included industrial, manufacturing, biotech, and residential. Some interviewees are or have been involved in development within the Genentech Master Plan, the El Camino Real/Chestnut Avenue Area Plan District, and the Gateway Area Plan District.

The majority of participants (about two-thirds) had at least some first-hand knowledge of the Zoning Code, while some (about one-third) had no or little familiarity with the Code itself. All expressed some interest in zoning as it relates to community development.

<u>Question 3</u>: Before we talk about what we should revise, let us first talk about what you find particularly beneficial or effective about the current regulations. What would you NOT change?

Respondents noted that the following regulations work well:

- Use regulations are generally effective in preventing problems with compatibility.
- Standards for commercial development have been working well, even during recent COVID restrictions.
- The industrial section is working well right now, particularly Mixed Industrial and the flexibility it allows.
- The Code, including uses and development standards, generally work well for the biotech industry and lead to well-designed development, specifically in the Gateway and Oyster Point areas. The fact that there are no state mandates that control development of biotech uses has left room for creativity and led to good design.
- Definitions for biotech are appropriate.
- Existing parking ratios are fairly low, and that is good/progressive.
- Parking stall size is generally good as it discourages compact spaces and promotes universal sizes.
- The recent work on cannabis was well done and is working out.

<u>Question 4</u>: What are the Code's shortcomings in achieving quality well-designed development? Please be as specific as possible.

Responses related to specific development standards focused on height, floor area ratio (FAR), open space, and utilities. Following are specific responses related to these and other development standards:

- Parcels within walking distance of transit-oriented development should be up-zoned (density, height, FAR).
- Tall developments should be allowed on larger parcels only.
- High rises may be OK in Lindenville but should be kept out of most other neighborhoods. The height of new mixed-use development is very controversial among nearby established single-family neighborhoods.
- East of 101, 12 to 15 stories is appropriate.
- Height regulations need to take into account modular construction, which has taller floor-to-floor heights.
- Height regulations for non-residential uses should allow room for screening of mechanical equipment.
- There is a conflict in the Code between heights and airport noise contour; this needs to be resolved.
- The FAR in the Industrial and Mixed Industrial zones is too low.
- Achieving a "higher and better" use is very difficult in Industrial zones.
- Need to get densities right. An allowed range of 40-60 du/ac is too narrow and limits feasibility.
- The Code should support Type V over podium construction.
- In South San Francisco, the wind blows fast from the northwest. The Code should discourage open spaces that face the wrong way (no decks on the northwest corners of buildings) and wind attenuation devices should be encouraged or required.
- The Code has allowed walls along 101 and canyons between buildings. This is not desirable, and the new Code should discourage/disallow it. Development standards should pull rooflines back to let light in.

- At-grade open space should be required. The Code should establish a minimum requirement per block and should also be open to allowing alternative ways of providing open space (elevated, mini-parks in parking aisle, etc.).
- Landscaping is so important to creating a great city. Landscaping needs to be thought about and encouraged, especially east of 101. Trees have numerous benefits to communities.
- It should be OK to place utilities underground; the Code should not require them above ground. The Code
 also needs a fee structure that can facilitate undergrounding of utilities by district or area because parcelby-parcel undergrounding doesn't always work. Transformers especially should be allowed to be
 underground, since they're so ugly above ground.
- The Code requires excessive clearance for parking stall dimensions near columns and door swings; this
 clearance can be reduced. See Section 20.330.010.D.6.
- Regulations for trash enclosures on prominent intersections are problematic and should be clarified.
- The Gateway Specific Plan is "ancient;" standards need to be updated.
- Updates are needed to standards in the El Camino Real/Chestnut Area Plan including: street wall requirements (too challenging to comply with); open space requirements (too onerous for mid-rise and high-rise development); retail height and depth (too challenging to comply with); and the amount of required retail (the market isn't there for it).
- Test out design standards to make sure they make sense and don't lead to poor design. For example, the required second-story step-back in single-family residential zones doesn't always work and often results in design that "checks the required box" but looks odd and arbitrary. Similarly, the design standards for articulation that apply to higher density housing (Type V over I) can result in design that "checks the required box" but makes the building appear monotonous.
- The City needs a public art program.

Responses related to design generally referenced recent trends in new development and the contrast with the City's older and historic buildings and styles. Following is a list of specific responses related to design:

- Design standards should emphasize design, ensure that all elements of a project's design are integrated
 and lead to good design on the whole. All elements of site design (open space, walls, fences, etc.) should
 be coordinated with and match the design of the building.
- Housing should look more like the city's historic buildings (e.g., City Hall, library, State Room). South San Francisco is not a modern-looking town and the community wants to keep it that way. We don't want showy or glassy development. There needs to be a slow integration of new architectural trends with traditional ones in the city. No LEGO pieces!
- While the Code allows projects that are too big and boxy for their site, the Design Review Board often will
 not approve this.
- New residential projects, including the Cadence project and new high-rises, are too blocky, too
 "downtowny," too close to the sidewalk, and lacking in articulation. The Code should encourage more
 articulation, open space, and step-backs to ensure light access to all spaces for all types of development.
- Keep the traditional look nothing to modern, boxy or glassy. Setbacks, reveals, light access, and style should reflect the historic context.
- Affordable housing should not be recognizable as such.
- The City should not encourage the development of new "missing middle" housing.
- New housing development should incorporate lots of open space and green space.

- The Code should address the fact that local governments have to abide by State mandates, and those mandates prevent quality high-density residential design. Biotech development, which is not restricted by State mandates, has more room for creativity and articulation in design.
- High-rises are not appropriate in South San Francisco. Tall apartment buildings are OK but need to be in the right locations. Heights should transition gracefully across the city with the tallest buildings located in the core of the city.
- Some examples of desirable design include: Biotech design, especially the corner of Gateway and Oyster Point; the Crossing at Avalon in San Bruno; new five-story residential development on Gellert across from 5 Guys.
- Some examples of undesirable design include: Cadence (the design is too boxy, poor height transitions, not enough articulation, and the ground floor is a lost opportunity for retail/active uses); development by the Millbrae station (too boxy); and new residential development on San Bruno Mountain (too blocky and jarring, wrong location for this type of design).

<u>Question 5</u>: Do you think the use regulations are effective in allowing desired uses and keeping out undesirable or incompatible uses?

Interviewees generally expressed a desire to see a greater range of uses in South San Francisco. Participants noted that better frontage design is needed to activate the ground floor and encourage walkability, establish a balance between retail, jobs, and housing, and encourage economic development. One noted that "while suburban cities like South San Francisco are less responsive to this approach, it is essential to planning for and creating vibrant areas."

At the same time, many responses referenced the need to be sensitive residential uses' incompatibility with other uses and infrastructure. One interviewee noted that the City's problems are not so much about uses; rather, about the ways that the community gets *to* uses (sidewalks, transit, bike lanes, trails, etc.) and that the Code should integrate active transportation, move away from suburban office parks and toward urban villages. Specific responses by development type (non-residential, residential, and mixed-use) follow.

Non-residential Uses

- We need new industrial buildings. Due to current zoning, the City has lost 4 to 5 million square feet of
 industrial real estate to life sciences development. Making things worse, the demolished industrial
 buildings were the newer and better ones.
- Life science has different levels. There are life science uses that can be within with mixed-use and residential uses and those that need to be separated from housing (animal facilities, cadavers, etc.). This comes down to manufacturing vs. research/computational science.
- Life science uses should be conditionally permitted in the industrial districts only.
- Because of its proximity to BART, Lindenville should be more flexible with uses and allow logistical and industrial uses.
- Grocery stores are needed if residential is going to locate east of 101.
- Support street food (temporary street closures, updated street vendor standards).
- Desired non-residential uses to support residential areas should be welcome west of 101.
- The Code should allow a diversity of uses. The downtown, highway commercial, business commercial, and other areas need to be flexible/less restrictive in terms of uses, small businesses, offices, etc. We need an entertainment district, grocery store, office space, flexibility for uses like a glass repair shop.

- Freeway Commercial (FC) is the most restrictive zoning district, as it only allows retail. Downtown districts are also too restrictive.
- It is a problem that many zones don't allow office, and that leads to vacancies.
- E-commerce should be allowed in districts other than just Mixed Industrial. Allowing e-commerce on infill sites will reduce greenhouse gas emissions. These uses use smaller trucks, generate fewer trips and shorter-distance trips than people think, and generally operate outside of peak hours.
- The Code should always allow uses for which the building was designed. For example, there are cases
 where a non-industrial use moves into an industrial building, and zoning has changed such that industrial
 uses are nonconforming. Then, when the non-industrial use moves out, an industrial use can't move back
 in.
- Resolution 84-97 was to passed to allow long-standing industrial uses to remain in historically industrial
 areas as the land use designation in these areas changed. The Code should make it easier for industrial
 uses to return as well, as there is often a market for these uses. The City doesn't need to favor biotech so
 much.
- Let the local economy decide what uses should come—not the City. The Minor Use Permit and Conditional Use Permit process is a deterrent to development.

Residential Uses

- South San Francisco should be open to housing east of 101, including at Oyster Point. The City should
 also allow tall heights for residential uses east of 101 because there are no single-family residential areas
 there to object to it. But, we'll also need services (schools, grocery, etc.) to support residential in that
 area.
- High density residential is controversial, so duplex/multi-plex is more suitable to South San Francisco at
 this time. High-rises in neighborhoods are not appropriate. Thoughtful development with high density in
 appropriate areas is OK; for example, in areas that are active at night. Balancing perceptions and comfort
 levels will be the best approach to mixing uses.
- Residential may not be appropriate near lab testing uses on Genentech and other biotech campuses,
- Concerns about lab and residential adjacencies is more about people's perceptions than actual safety.
- We don't want housing next to the freeway our residential uses should demand better in terms of quality of life (noise, air quality).
- Keep residential off busy corridors and rely on rails-to-trails for new residential uses in quieter areas.
- Change the S zone to accommodate teacher housing.
- Consider live/work uses.
- Fox Ridge Elementary and Serra Vista School are opportunity sites.
- We need more affordable units in the older parts of town.
- Let's loosen barriers to allow more ADUs. This may include increased height for detached ADUs.

Mixed-use Development

- We need to encourage more mixed-use development.
- A mix of uses, especially east of 101, needs to be addressed in the Code. People will need services (e.g., restaurants) and a mix of uses will improve the success of all sectors (housing, business etc.) as this area grows.

- East of 101 should become more of an urban village, less of a suburban business park. The community would like to see "Office Campus 2.0" that merges residential uses with life sciences. Urbanize the area, introduce more amenities, and fill in its "dead zones."
- Need flexibility in ground floor uses in mixed-use development. Considers gyms, restaurants, child care center, cleaners, etc. Cadence and other projects by the freeway and Airport Boulevard lack ground floor activation.
- The El Camino Real/Grand/Westborough/Old Municipal building area could benefit from mixed-use development.
- Senior housing needs to see more mixing with commercial uses.
- Diversifying with a mix of uses will also expand peak hour of uses instead of intensifying commute hours.
- In Burlingame, the Code requires disclosures and/or notices to potential residents that they are living adjacent to potentially incompatible uses. South San Francisco should do the same.

<u>Question 6</u>: In your opinion, do the City's parking requirements match actual parking demand? Should the City consider parking maximums in non-residential areas?

Responses to question 6 ranged from "Don't expect people to give up their cars anytime soon" to "Get people out of their cars and using alternatives modes" to "The City is moving to lower ratios and this is scaring developers." Specific comments related to parking, some of which contradict others, follow:

Parking in the Downtown Area

There is a need for more parking Downtown and more parking for Caltrain passengers. City-funded parking structures are important because we can concentrate trips to one area and free up street parking at the same time; the City should add one more parking structure in the Downtown for both residents and businesses. Permits can be sold to residents; however, shared structures should not count toward required parking in the Downtown Commercial district. In addition, structures should be designed with flexibility accommodate a variety of uses over time.

Parking for Non-residential Uses

Parking requirements in the industrial, office and R&D areas can be problematic. Parking requirements are too onerous for older buildings that have high lot coverage. And because of the requirements, owners are restricted as to what they can put there. The City should "grandfather" these older buildings into how much parking they can provide. For the life sciences, limiting parking with a parking maximum makes sense.

Parking in Residential Neighborhoods

Parking needs to be context-sensitive: the community "loudly" wants more parking in residential areas and less parking in the central transit corridor. In residential areas, older generations and multi-generational families are attached to their cars and parking, and street parking is impacted. Around the BART station, there is an overflow parking problem, and you see people parking on the sidewalk because there is not enough street parking. When people use their garages as storage, and when people build ADUs with no parking provided, the problem is worsened. A parking permit process may help in problem areas. We may also need more creative solutions.

Parking Management

Ideas for managing parking and supporting lower parking ratios include:

- Reduce parking requirements and focus the Code's language on alternative modes (transit, bike share, ride share, walkability, trails, ferry service to San Francisco, etc.). When we increase density, parking needs to take a backseat to public transportation and other modes. The City should focus on building affordable units and open spaces rather than enforcing parking ratios and building parking garages. The future of driving is changing, so let's plan for that.
- Encourage or require shared parking arrangements, particularly in Downtown Commercial, Freeway Commercial, Business Commercial.
- Unbundle parking, so people who don't have a car don't have to pay the price of unwanted parking.
 Bundled parking creates an affordability problem and a housing problem.
- Provide district-based parking. Once a neighborhood gets to a certain density, the City should provide parking structures.
- Limit parking near transit corridors and establish parking maximums. A maximum of 2.5 spaces per 1,000 square feet for office/R&D uses is a good standard.
- Create a transportation management association for the Downtown and for the area east of 101.
- Establish a parking permit program that keeps people from inflating the needs for parking in residential areas. For example, a maximum of 2 permits issued per household.

<u>Question 7</u>: In your opinion, do the City's sign regulations encourage a good balance between providing sufficient and visible signage for information and advertising while addressing aesthetic and clutter concerns?

Interviewees felt that the current sign regulations are good and generally work well in balancing communication with aesthetics. Participants noted that current regulations work best for small monument signs, wayfinding signs, and electronic signs. There are, however, some concerns in the community about large signs—specifically, billboards visible from northbound 101, the Mercedes Benz sign along 280, and building top and large monument signage for development east of 101. Many tenants desire much bigger signs so that their names can be seen from a mile away or more. One interviewee noted that special signage programs/campaigns like Genentech's "people cured" signage should be carefully regulated, to ensure fairness across all property owners and companies.

Specific suggestions for the update to the sign ordinance included:

- Ensure that signs don't get too big.
- Don't allow box-lit signs.
- Don't allow building top signs on all four sides of building. Two sides in enough: the side facing the freeway and the side facing the major street.
- Limit the size and number of billboards.
- Allow signage in other languages.
- Ensure that lighting and location are consistent to create continuity in the City.

<u>Question 8</u>: What are ways the City might incentivize housing and infill development in the Downtown? Think about overlay districts, mixed-use zoning district, density and height bonuses, relaxed parking requirements, expedited review, other strategies.

The majority of respondents acknowledged that more housing, including affordable housing, is needed near transit areas. One noted that "current projects do not scratch the surface of the need of affordable housing, and this is causing a fear of displacement." Several participants suggested that the City act as developer or partner with developers and/or agencies to create affordable housing.

Question 8 solicited conflicting responses as to where infill housing is most appropriate. Some argued that the City should consider new housing, redevelopment, and opportunities for mixed-use development throughout the entire City while some argued the west side does not and cannot support more housing. Fox Ridge Elementary and Serra Vista School were identified as opportunity sites for housing. Other specific feedback is summarized below.

Policy and Zoning Regulations

- Height limits are limiting development and should be updated to match current needs and trends.
- Up-zone in the downtown area and focus on transit-oriented housing.
- To achieve the City's affordability goals, we'll need a City density bonus on top of the State density bonus.
- Extra density alone will not solve the problem with affordability. Plus, extra density is not necessarily an
 incentive—there is a big cost difference between Type V and high-rise construction.
- The City should increase its 15% inclusionary housing requirement.
- An affordable housing overlay is needed. Consider a 100% or even 200% affordable housing overlay.
- Any incentive package (bonuses, fee waivers, etc.) should be tied to good design.
- Flexible zoning has been successful in San Francisco and Oakland. The Mosso Apartments in San Francisco are a good example of what flexible zoning has yielded.
- The caps on square footage have limited development of ADUs.

Funding

- Fees and financing are the biggest barriers to development.
- Establish a community land trust.
- Use Tax Increment Financing for improvements.
- Pass bond measures.
- On City-owned mixed-income development, issue 50- or 100-year leases to keep public lands in public hands.
- Create funds for affordable housing, housing stability.

Procedures

- Update procedures to create a fast timeline and streamlined application process.
- The City needs to take action when developers can not follow through. For example, impose a \$50,000 fine for not breaking ground.

Design of Affordable Housing

- Encourage duplexes and fourplexes.
- The Code should identify community benefits.
- Prioritize open spaces and other community benefits over parking to make affordable units more livable.
- Affordable housing must be inclusive and mixed with market rate units. For example, 33-66% affordable for tri-plex, 50% affordable for fourplex.
- We have to make sure South San Francisco doesn't lose its sense of community. Resources need to be
 dispersed throughout the city. It's unfortunate that there is such a narrow vision of each specific
 neighborhood and street. The Code must reconcile this.

<u>Question 9</u>: How well do the administrative procedures work for development? Consider appeals, variances, design review, minor modifications, use permits, nonconforming provisions, costs and fees, etc.

Interviewees generally responded that the administrative process is good, efficient, and works well. One noted that if a project is denied, there is a good explanation for it. Participants complimented the Design Review Board (DRB), noting that members understand design, the process, and the Code; are reasonable; and don't try to redesign projects. Interviewees noted that ADUs are easy to build and approve; that going through the mitigation, monitoring and reporting (MMR) process was a positive experience; and that the minor modification process is quick. Almost all interviewees noted that the process is made better by the fact that City staff and officials are accessible, helpful, easy to work with. However, interviewees offered some ideas to reduce barriers and minimize hurdles. These are summarized below.

- When something comes to the DRB, there are often items missing from the application requirements. The Planning Department should have the ability to accept or deny applications for Major Modifications or other projects going to the DRB to prevent this problem.
- Major vs. minor modification should be clearer, less subjective.
- The process for a variance could use a little more predictability.
- It would be nice if the timelines were reduced.
- Use permits should be less restrictive.
- Specify/clarify submittal requirements.
- The number of meetings is a notable barrier to development.
- Add a requirement for community meetings/outreach so that developers don't waste time and money.
- The City should reduce the reliance on discretionary review and give staff more discretion.
- Increase square footage of projects that can be approved over the counter.
- Developers sometimes have issues explaining planning issues, zoning, development standards, design, and land use to the Planning Commission.

- The Code is not clear enough as to the basis of decisions so approval can feel biased and subjective.
- Being clear about required community benefits will help streamline the process.

<u>Question 10</u>: Do you think that the Zoning Code is understandable and easy to use? Consider its organization, format, language, illustrations, tables, cross-references.

Many interviewees responded that the Code is easy to navigate, easy to read, and easy to understand. Respondents noted that the tables and diagrams are helpful and that the definitions are clear. However, respondents noted the following as room for improvement:

General Usability

- In general, the Code looks too analog. It needs an updated interface with imbedded links to ease navigation.
- Diagrams are needed for all of the most common uses, not just a single-family homes.
- Improve the legibility of standard zoning constraints like landscaping, setbacks, etc. Sometimes there are surprise requirements.

Rules of Measurement

- Update how area is calculated for FAR. The language about what's excluded from the calculation is vague.
- Fix how height is measured and ensure the rules of measurement are as pertinent as possible for each type of development (e.g., residential may need to be different from biotech). If it's not clear, juggling how the client, City, and consultant want to make these measurement calculations can be a big task.

Definitions

- Update definitions for R&D uses to include the range activities specifically, those that are incompatible
 with residential uses and those that are not.
- Definitions need to be updated, especially for industrial, e-commerce, and freight forwarding. The
 definition of freight forwarding is a problem because it doesn't reflect contemporary uses (logistics, ecommerce, distribution). E-commerce is larger and more expansive than freight forwarding.
- Automotive definitions are a problem. For example, the definitions currently don't distinguish between engine work and installing stereos.

Question 11: Are there other issues we have not covered that are important for us to consider?

Additional comments offered by interviewees are listed below.

- A Zoning Code is not accessible to all. The community needs to see and understand the benefits of a new project, so the City should communicate in multiple languages early and often. We need the community to understand the intent of City actions and know that these actions are intentional.
- The waterfront is underutilized.
- Carefully managed growth and preservation of single-family neighborhoods is important.
- Connect more trails and pedestrian paths. Make biking, walking and running easier than driving.
- Environmental impacts need to be carefully addressed in the Code update.

- Consider the "Open Zone" concept.
- The City should consider establishing an historical housing fund to help in historic preservation efforts.

Question #12: If we have additional questions, may we contact you?

All interviewees agreed to be contacted to answer additional questions.

APPENDIX

City of South San Francisco Zoning Code Update

Stakeholder Interview Questions

Na	me:	Day:	Time:	General mood:
and for	d administer, improve outco	me of development pro	jects, implement	ting process, make code easier to use community vision and needs, develop oriate. Ensure Code is legally compliant,
be		ective, as a code-user/p	erson knowledge	code/permitting issues that needed to eable about the City. Help the consultant community.
	onfidentiality: All results will ividual. Your participation is			e no comment can be attributed to an interview at any time.
Ple		as sincerely as you can	. The interview sl	ou will not be judged on your responses. nould take about 45 minutes. There will
1.	What is your relationship versident, business owner/o			Council, Commission, property owner, n, etc.)?
2.	We'd like to know about you What are the specific regul			s of development are you involved with?
3.	Before we talk about what effective about the current			what you find particularly beneficial or ge?
4.	What are the Code's shortdas possible.	comings in achieving qu	uality well-design	ed development? Please be as specific

Do you think the use regulations are effective in allowing desired uses and keeping out undesirable or incompatible uses?
In your opinion, do the City's parking requirements match actual parking demand? Should the City consider parking maximums in non-residential areas?
In your opinion, do the City's sign regulations encourage a good balance between providing sufficient and visible signage for information and advertising while addressing aesthetic and clutter concerns?
What are ways the City might incentivize housing and infill development in the Downtown? Think about overlay districts, mixed-use zoning district, density and height bonuses, relaxed parking requirements, expedited review, other strategies.
How well do the administrative procedures work for development? Consider appeals, variances, design review, minor modifications, use permits, nonconforming provisions, costs and fees, etc.
Do you think that the Zoning Code is understandable and easy to use? Consider its organization, format, language, illustrations, tables, cross-references.
Are there other issues we have not covered that are important for us to consider?
If we have additional questions, may we contact you?

