



San Mateo, Santa Clara & San Benito Counties

September 7, 2023

City of San Mateo

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San Mateo, CA 94403

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Subject: Comments on San Mateo Draft General Plan 2040 and Draft EIR

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

The Sierra Club Loma Prieta Chapter's Sustainable Land Use Committee (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 July 2023 Draft San Mateo General Plan 2040 (GP) and the August 2023 Draft EIR.

The draft GP has many very good features and is well organized and detailed. Some final adjustments will further strengthen this important GP. SLU comments are primarily focused on the GP. Limited EIR comments are specifically noted as EIR comments.

SLU has four overarching concerns that the GP and EIR should address more. They are summarized below. The detailed application of these four comments on the Goals, Policies and Actions in the GP are in the attachment to this letter.

1. The lack of housing, particularly affordable housing, is a major crisis and needs to be strongly addressed.

The need to add more housing, particularly affordable housing, is important to addressing environmental issues. As essential workers (e.g. teachers, nurses, service workers, etc.) on the Peninsula cannot afford to live here, they must commute from long distances to housing they can afford. These long commutes lead to increased emissions of Green House Gases (GHG) and other pollutants. This also leads to more traffic congestion around San Mateo as the San Mateo-Hayward Bridge, Highways 92, 101 and 280 convey more traffic from the East Bay and surrounding areas. They also cause sprawl development of open space and agricultural land in outlying areas.

The key to addressing this problem is increasing housing density and supporting (i.e., funding) affordable housing, particularly near transit.

Land Use Designations such as Residential High II and Mixed-Use High II are needed to provide for this higher density. The Mixed-Use land use needs to require significant amounts of residential. Allowing higher density is one way the GP can provide a financial incentive for more affordable housing (e.g., 20-33% of a project, if financially feasible), as noted in prior studies for San Mateo¹.

Much higher housing density is needed, particularly within ½ mile of transit. See SLU Guideline for Downtown and Station Area plans² for additional recommendations.

2. The GP needs to strongly address the Greening of the City.

The greening of the City includes more open space, more developed parks, wider sidewalks to encourage safe pedestrian travel, wider and safer bike lanes to encourage bike travel, complete streets³ and Green Corridor/Green Streets⁴, restoration of creeks and riparian areas, creation of pollinator pathways, use of natural methods to address issues like sea level rise (SLR), and natural vegetation to reduce wildfire hazards.

The ability to have building heights as much as 12 Stories in the High II Land Use Designations is essential for freeing land area for greening the City.

The greening of the City has major environmental benefits as well as improving the quality of life for residents. Being allowed to use higher building heights is the way to create more open space, parks, bike paths, pedestrian walkways and green streets. A clear example of this was demonstrated in the recent scenarios put forward as part of the “Re-imagine Hillsdale” presentation of March 8, 2023⁵. The scenario that stayed with the current 5-story limit produced a design with very little open space and with the area facing the neighborhood on Edison Street being high and dense. However, the scenario that allowed heights as much as 10 to 12 stories for buildings near the railroad and along El Camino Real (ECR) produced a design with a large amount of open space, parks, and a more compatible neighborhood design along Edison Street. The higher height allowed, adjacent to the railroad and ECR, made it possible to lower heights near the existing neighborhood on Edison Street and to provide much more park and open space for the entire community to enjoy.

¹ <https://sanmateo.primegov.com/Portal/viewer?id=715&type=0>

² <https://www.sierraclub.org/sites/www.sierraclub.org/files/sce-authors/u4142/D-SAP%20Guidelines%20Rev%2010-14-19.pdf>

³ <https://www.cityofsanmateo.org/DocumentCenter/View/63263/Sustainable-Streets-Plan?bidId=>

⁴ <https://www.sierraclub.org/sites/default/files/sce-authors/u4142/Green%20Streets%20Presentation%20-%201-20-21%20DC.pdf>

⁵ <https://vimeo.com/806539434/5bbfc4a1a9>

3. The GP must have strong measures to address Climate Change.

First the GP must encourage city actions that will reduce GHG emissions. The first two items listed above are major actions that will help reduce GHGs, but there are other aspects of the GP that will also help. For example, consider Paris Aligned Buildings which are efficient, renewable microgrids, without embodied carbon, and on transit.

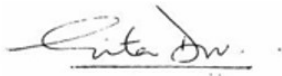
Second the GP needs to plan for resiliency in the face of the effects of Climate Change such as Sea Level Rise (SLR) and the increased risk of wildfires and floods.

4. The current GP needs to ensure that the RHNA is accommodated so as to avoid triggering SB 35's density bonus options, and to put RHNA housing within a half mile of the transit corridor. Please clarify how meeting the RHNA will be evaluated in the EIR.

The attachment to this letter includes comments that reflect these four main concerns as they apply to the detailed Goals, Policies and Actions in the draft GP. These comments focus on Chapters 2 (Land Use), 3 (Circulation), 6 (Conservation, Open Space, Parks and Recreation) and 7 (Public Services and Facilities Element).

We ask that you consider this information as you finalize the GP and EIR. SLU is prepared to help the City in finalizing the GP and EIR.

Respectfully submitted,



Gita Dev

Co-Chair Sustainable Land Use Committee

Sierra Club Loma Prieta Chapter

Specific Comments on Draft General Plan (GP) of July 28,2023

Below are specific comments on Chapters 2, 3, 6, and 7. Proposed changes to the specific text in the draft GP are noted in underlined Italics.

Chapter 2 Land Use

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

“Plan carefully for balanced growth that with a high degree of certainty, fully provides ample housing that is affordable at all levels and job opportunities for all community members; maximizes efficient use of infrastructure; limits adverse impacts to the environment; and improves social, economic, environmental, and health equity.”

2. **Modify Policy LU-1.4. to emphasize housing and open space in mixed use development. Suggested rewording:**

“Policy LU 1.4 Mixed-Use. Encourage mixed-use developments to include ~~increased~~ significant residential components to provide greater proximity between jobs and housing, promote pedestrian activity, ~~and~~ reduce traffic congestion and vehicle miles traveled (VMT). The Mixed -Use High I and II designations be modified so they clarify the TOTAL FAR including both residential and office, do not maximize Office at the expense of Residential. Mixed Use needs to favor Residential so that the jobs/housing fit imbalance can be improved. Also, all the Mixed Use High I and II designations should have mechanisms to assure that the higher heights will help get more land for open space/parks/bike lanes/green streets/etc.”

3. **Modify General Plan Height and Intensity Standards**

Increased heights and density are vital to meeting affordable housing needs and to provide more open space for greening the City. Increased density is a way to help assure the needed affordable housing gets built and will allow for more walkable communities with amenities nearby. A study⁶ presented to the City Council on July 15, 2019 showed that higher density would lead to more affordable housing particularly for lower income groups. Allowing more height is a way to create more open space for green streets, parks, etc. The draft GP has no specific goals, policies and actions listed for this vital topic. But the GP does provide height and density limits in Table LU-1 Land Use Designations and in Figure LU-1 Land Use Map.

The Land Use Designations High II are an important component of the GP as they allow higher density (e.g., up to 50-200 units per acre) in areas near the train stations and along El Camino Real (ECR). They also allow increased height (6 - 10 stories) in the areas near train stations and along ECR.

The following changes to the Land Use Designations are recommended:

⁶ See section on Density Analysis. <https://sanmateo.primegov.com/Portal/viewer?id=715&type=0>

The height limit for High II should be 6 - 12 stories rather than 6 - 10. This will allow for more land to be available for parks, open space, wider sidewalks, safer bike lanes and other environmental benefits. The staff has indicated that the input from the community as well as from statistically significant polls was that affordable housing and more open space/parks were the top priorities for new development. In addition, going to higher densities and heights (up to 12 stories) was supported by over 60% of the people in statistically significant polls⁷.

All the High I and II designations should have mechanisms to assure that the higher heights will help get more land for open space/parks/bike lanes/green streets/etc. The mechanisms could include having large developments like Hillsdale, Bridgepoint and Bel Mateo provide a significant percentage of land for these uses. For smaller sites consider perhaps a monetary contribution for parks/etc or contribution of a smaller percentage of land to a common open space with other neighboring developments.

4. 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.*”

5. Other comments to consider:

- Clarifying what "evaluation" the city would do if commercial construction exceeds proportional residential construction (LU 1.2)
- Allowing neighborhood-scale retail in any district (LU 3.4)
- Setting a target date to end gas usage (LU 10.8)

Chapter 3: Circulation

1. The changes to Policy C-1.2 from the draft last year are good. SLU would welcome the opportunity to help the incorporate Guidelines on Green Streets⁸ into the implementation of this policy.

“Policy C 1.2 Complete Streets. Apply complete streets design standards to future projects 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, and should include landscaping and shade trees as well as green streets stormwater infrastructure to reduce runoff and pollution.”

2. Other comments to consider:

⁷ <https://www.cityofsanmateo.org/DocumentCenter/View/87282/San-Mateo-Community-Opinion-Survey-2022-Report>

⁸ <https://www.sierraclub.org/sites/default/files/sce-authors/u4142/Green%20Streets%20Presentation%20-%201-20-21%20DC.pdf>

- Indicate preference for funding SamTrans routes rather than create separate shuttle services (C 2.7)
- Creating a city-run bike/scooter share (C 4.3)
- Getting rid of parking minimums (C 7.7)

Chapter 6: Conservation, Open Space, Parks and Recreation

1. **Strengthen Goal COS-3, and the Policies COS 3.1 and COS 3.2** to prioritize restoration of creeks and their riparian setbacks. See recommended changes below.

“GOAL COS-3 Protect and improve San Mateo’s creeks as valuable habitat and components of human and environmental health. Prioritize restoration of creeks and their riparian setback as part of any new developments impacting the creeks.”

“Policy COS 3.1 Aesthetic and Habitat Values – Public Creeks. Preserve and enhance the aesthetic and habitat values of creeks, such as San Mateo, Laurel, and Beresford Creeks, and other City owned channels in all activities affecting these creeks, including revegetation, rewilding, erosion control, and adequate setbacks for structures. Prioritize restoration of creeks and their riparian setback as part of any new developments impacting the creeks.”

“Policy COS 3.2 Aesthetic and Habitat Values – Private Creeks. Encourage preservation and enhance the aesthetic and habitat values of privately owned sections of all other creeks and channels, shown in Figure COS-3. Prioritize restoration of creeks and their riparian setback as part of any new developments impacting the creeks.”

2. **Designate and exclude areas that are not developable due to natural conditions (COS 1.3, 1.8)**

Chapter 7: Public and Facilities Element

1. **Strengthen the requirements to improve creeks and riparian areas in PSF 3.10 and 3.11.**

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 or tunnels. 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. Revise the policies as noted below.

“**Policy PSF-3.10 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 and enhance riparian vegetation and water quality. Prevent erosion of creek banks. This will be a particular focus for Laurel Creek near Hilldale Mall and San Mateo Creek in Shoreview and Downtown.”

“Policy PSF-3.11 Hydrologic Impacts of Creek alteration. 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.*”