

September 25, 2023

[Sent via email: [msandhir@cityofsanmateo.org](mailto:msandhir@cityofsanmateo.org)]

Manira Sandhir  
Planning Manager  
City of San Mateo  
Community Development Department  
330 West 20th Avenue  
San Mateo, CA 94403

**Re: San Mateo General Plan Update and Draft Environmental Impact Report Comments**

Dear Manira:

On behalf of HSC Property Owner LLC, the owners of the Hillsdale Shopping Center and surrounding properties (Owners), we appreciate the opportunity to submit comments on the Strive San Mateo General Plan Update (GPU) and Draft Environmental Impact Report (DEIR).

As you may know, the Owners have embarked on a process to collect community input to reimagine the Hillsdale Shopping Center for its next evolution – from a shopping center into a great neighborhood with retail, homes, supporting commercial development and more. As part of this process, our team has reviewed the GPU and DEIR and supports the City’s goals and efforts in the GPU. In the spirit of collaboration, the Owners wish to submit the following comments for consideration on both the GPU and DEIR. Further, we request that these comments are considered in the implementation of the GPU, i.e. through zoning amendments or otherwise.

GPU

1. Land Use Policy 6.2 [Hillsdale Shopping Center] – This policy allows redevelopment of the Hillsdale Shopping Center for a “mix of uses, including commercial, retail, office, hotel, and residential uses.” Given the market demand for research and development (R&D) uses, and the fact that R&D uses can provide important job generating uses that have the added benefit of “in office” employment that energizes mixed use areas, we request that this policy explicitly identifies that R&D uses are permitted. We also request that R&D is explicitly allowed in the Mixed Use designations.
2. Land Use Table LU-1 [Land Use Designations] – We note that the new designations identify height limitations by stories rather than building height. We

request discussion of how these story limitations will be implemented in the implementing zoning. We'd like to ensure that if/when height is codified in feet, that it does not cause any surprises. We note that the actual height can vary depending on preferred ceiling heights for varying uses.

3. Circulation [new policy/action suggestion] – Consistent with efforts to reduce vehicle miles traveled (VMT) articulated in the GPU (for example, Action C 2.3 [Education and Outreach]: “pursue education for developers and employees about programs and strategies to reduce VMT, parking demand, and the resulting benefits” and Policy C 6.7 [Capital Improvement Program]: “Prioritize improvements that increase person throughput in project prioritization to reduce VMT”), we request the City take action to incorporate multi-modal improvements into the Capital Improvement Program so that developer-funded transit, bicycle and pedestrian infrastructure improvements will earn Transportation Impact Fee (TIF) credits based on Multimodal Level of Service criteria. We note that this is consistent with Zoning Code Section 27.13.090 which grants credits for improvements that are identified in the Transportation Improvement Fee Technical Report. This is an important step in implementing the transition from automobile focused improvements to multi-modal improvements.
4. Circulation [new policy/action suggestion] – We recommend that the General Plan reflects and expands policies in transit oriented plans, including the Rail Corridor Plan, that require applicants for new developments within one half mile of a major transit station prepare a parking demand study, rather than impose a specific parking ratio, in recognition of access to mass transit. We recommend that this policy is reflected in the GPU to ensure consistent implementation in transit oriented plans. We also note that this action would be consistent with the intent behind AB 2097, which largely eliminates parking requirements for projects in proximity to major transit.
5. Conservation Open Space Policy 7.2 [Acreage Standards] – This policy is to “[a]quire or accept for dedication two acres of neighborhood and community parks per 1,000 residents.” We note that this standard is highly land consumptive and places a heavy burden on development. If implemented conservatively, it can result in the loss of residential units, which are sorely needed to meet RHNA targets. We have a number of suggestions to make this policy feasible.
  - a. We request that a broad scope of open space is accepted, including plazas, paseos, parklets, trails, courtyards and amenity terraces. We understand that this is consistent with past practice.

- b. We request that developer funded park improvements that are included in the Parks Master Plan continue to receive credits from park fees.
  - c. Finally, we recommend that this policy is implemented in consideration of park spaces provided in the same service area. For example, if ample parks have been provided in excess of the intended ratio in one service area, that should be considered in relation to other projects in the same service area.
6. Public Safety Facilities 4.3 [Building Electrification] – This policy is to “[r]equire electrification for new building stock and reduce fossil fuel usage for existing building stock at the time of building alteration.” We suggest that a feasibility standard is considered and that exceptions are allowed for affordable housing, commercial kitchens and R&D uses. An electrification requirement imposed on alterations to existing buildings could inhibit the ability and interest in altering existing uses. We anticipate that the alteration and preservation of existing uses, particularly affordable housing, would be encouraged and suggest that feasibility is considered in relation to an existing building alteration project. We understand that the San Mateo Sustainability and Infrastructure Commission is currently meeting to discuss and collect and discuss stakeholder input on the “Electrify San Mateo – Building for the Future: City of San Mateo Sustainable Buildings Strategy.” In particular, we understand the Commission is seeking input on the impacts of new requirements on existing buildings. Accordingly, we suggest that policy leaves room for stakeholder input and implementation flexibility.

With respect to new uses, a natural gas prohibition on some uses, particularly R&D and commercial kitchens, would pose real limitations on the ability to develop and market such uses. We note that other Bay Area cities have provided for exemptions. For example, Santa Clara exempts “L” occupancies (which includes laboratories), hotel laundries, commercial kitchens as well as other uses where there is “not an all-electric prescriptive compliance pathway”.<sup>1</sup> We recommend similar considerations in adopting electrification requirements.

7. Policy N 2.1 [ Noise Regulation] – This policy is to “[r]egulate noise in San Mateo to prohibit noise that is annoying or injurious to community members.” We would like to ensure that there will still be an opportunity to request construction noise exceptions, pursuant to a City process, for limited periods of time.

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<sup>1</sup> Santa Clara Code §15.36.040(b).

8. Policy N 2.2: [Minimize Noise Impacts] – This policy is to “[i]ncorporate necessary mitigation measures into new development design to minimize short-term noise impacts. Determine whether new development has the potential to result in a significant noise impact on existing development based on the following standards. Impacts will be analyzed based on long-term operational noise increases at the sensitive receptor property line, or new uses that generate noise levels at the sensitive receptor property line [above 5 dBA, with certain other additional requirements].” We suggest that existing ambient noise levels are considered in the implementation of exterior noise standards. For example, in one such example,<sup>2</sup> in the event the ambient noise level exceeds the otherwise specified noise standards, an “adjusted ambient noise level” is applied as the noise standard. In cases where the noise standard is adjusted due to a high ambient noise level, the noise standard shall not exceed the “adjusted ambient noise level,” or 70 dB(A), whichever is less. In cases where the ambient noise level is already greater than 70 dB(A), the ambient noise level is applied as the noise standard. We request a similar consideration and adjustments based on existing ambient noise levels.
9. Policy N 2.4: [Traffic Noise] – This policy is to “[r]ecognize projected increases in ambient noise levels resulting from future traffic increases, as shown on Figure N-2. Promote reduced traffic speeds and the installation of noise barriers or other methods to reduce traffic noise along highways and high volume roadways where noise-sensitive land uses (listed in Table N-1) [of the proposed General Plan] are adversely impacted by excessive noise levels (60 dBA [Ldn] or above).” We suggest that feasibility is considered when implementing this policy. There may be some instances when it is not feasible to install noise barriers given right-of-way or property ownership constraints and, therefore, suggest that this policy is implemented to the extent feasible.

## DEIR

1. Project Description and Appendix B [Projects Included in Buildout Projections] – We note that Table 3-1 [Proposed General Plan 2040 Buildout Projections] identifies the “total net change” in development from existing conditions. We request clarification on whether the site capacities assumed in the Buildout Projections reflect total capacity or net new capacity. It is well established under CEQA that using “net new” square footage reflects the true change in conditions

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<sup>2</sup> Orange Municipal Code, § 8.24.040©.

from existing/prior uses to the ultimate/future use conditions (14 Cal. Code Regs., § 15125, subd. (a)); *Fat v County of Sacramento* (2002) 97 CA4th 1270).

2. Wildfire – For the sake of accuracy, we note that Figure 4.18-5, “Potential Evacuation Routes,” does not appear to show that 31st Avenue and 28th Avenue now connect under the Caltrain Tracks as a result of a recent grade separation project. These new road connections may provide additional Potential Evacuation Routes east of the Caltrain tracks.

We thank you for your time and your consideration and your efforts on the GPU and DEIR.

Sincerely,



David Bohannon  
*President & CEO*

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