



Community Development
Department

Memo

DATE: September 20, 2023
TO: Planning Commission/Design Review Board
FROM: Dean Flores, Senior Planner
RE: Additional Documents, Item No. 2
Draft Objective Development Standards (ODS) Project

The attached written comments were received by 12:00 p.m. on September 20, 2023.



1010 Sycamore Avenue, 208
South Pasadena, CA 91030

T / F 323.258.4749
M 310.874.5214

September 19, 2023

**City of South Pasadena
Planning Department**

Draft Objective Development Standards: Comments

Matt Chang
Planning Manager
Email: mchang@southpasadenaca.gov

Matt and team:

I know it's been a long road and you all are ready for a vacation. Thank you all for your tireless work and for sharing the Draft Objective Development Standards (Toolkit) that AECOM prepared for the four cities including South Pas.

The following response comments are regarding Draft ODS Toolkit and are directly referenced from the attached PDF. Our notes are as follows:

Page 05 | Mixed Use Standards

- I understand the enormity of the task to create the toolkit, some of these items seem generic and don't apply to South Pas.
- Please clarify if the frontage models reflect 100% residential projects or mixed use.
- Landscaping is great, but can conflict with storefront and should be reviewed on a case by case basis. For instance, outdoor dining might conflict with the landscape requirement

Design Standards: Draft Notes

and some building design might not want to be setback 5 feet from the property line.

Page 06 | Setbacks and Streetwall

- 60% seems like a good percentage which allows for 40% of the facade to push and pull.
- There should be language that also allows for cantilever projections as well as step backs.

Page 07 | Modulation

- It would be good to also show what projections might look like in addition to the setback axonometric example.
- Please strike the "Exception for facades that meet the following standards:" This implies that only classically proportioned buildings are acceptable.
- This does not take into account for contemporary design. I am opposed to this strict limitation and it should be removed from the document.

Page 08-09 | Modulation

- It seems appropriate to encourage projects that are NOT superblock oppressive massing along the street edge without any relief. The buildings should have the opportunity to be porous and connect with the community, if that is a preference from the design team.
- The massing diagrams are super generic and all massing should be allowed to push and pull depending on the market driven forces, and be evaluated on a case by case basis.

Page 10 | Frontages

- The **Floor Height** section is a good goal but should not be defined as a minimum. The previous Mission Bell project only had 13 ft floor to floor heights for commercial. 15-18 feet is definitely preferred, but not always achievable.

Page 13 | Facades

- I am just curious about the Lighting requirement light source not being visible. I guess that refers to being shielded, which makes sense.

Page 14 | Open Space

- Private open space needs to be a minimum 5 ft to meet ADA code unless special design is provided. 4 ft is really not a usable depth for balconies.
- The Common Area requirement of 20 ft min. dimension and 400 sf of area is really antiquated and generic. All open space should be evaluated on a case by case basis. These dimensions are only really relevant for really large multifamily projects, not small ones.
- The tree requirement is a good goal but shade trees are not always the answer and should be evaluated on a case by case basis regarding what the goal is of the open space design.

Page 15 | Parking

- Regarding parking, driveways definitely do not need to be 24 feet wide. 18-20 feet is the normal, and for small projects 10 feet is accepted when serving less than 25 parking spaces.
- The distance between driveways should be evaluated on a case by case basis and not have a generic 50 ft requirement.

Page 16-17 | Electric Vehicle Charging Stations

- This should definitely be stricken from the document. California Green Code will determine what the EVCS requirements are.
- The Green Code keeps changing too. To have this in a static document we will use for the next 25 years might be confusing.

Page 18 | Multi-Family Standards

- The setback requirement should be stricken or re-worded to describe the 5 ft minimum as a goal but not a requirement. It should be evaluated on a case by case basis.
- 5 feet of usable area can mean a large amount of saleable / rentable area for a smaller project that is 3 stories, for instance.

Page 19 | Multi-Family Standards

- These diagrams and notes seen redundant.

Page 20 | Building Length + Facade Break

- The 6 unit or 150 feet in length maximum is generic and should be evaluated on a case by case basis.
- The facade breaks are also super generic and should be evaluated on a case by case basis. Often unit design is very modular and does not fit the 5 ft deep and 10 feet wide module. The facade break is a good thing, just don't set minimum dimensions.

Page 21 | Elevation

- These finished floor heights don't make sense and should just be removed from the document.

Page 22 | Facade Diagrams

- These diagrams and notes are redundant, already mentioned in the document.

Page 23 | Balconies

- Balconies must be a minimum of 5 ft to be ADA compliant unless special design features allow shallower depths. In reality, 5 ft is not a great balcony depth and hard to enjoy. 8 ft is the optimum minimum depth but not always feasible because it is consider non-leasable or non-sellable space.
- The balcony requirements for townhomes should be stricken, or evaluated on a case by case basis.

Page 24 | Open Space

- The **Residential Open** space requirements percentages are way too high. Also, not every unit will have a balcony. If there is a private open space requirement, it should be evaluated on Net floor area on GFA.
- Some balconies are built-in and are not open to sky. They should count towards private open space.
- **Common Open** space requirements of 400 sf and 15 ft in any direction is super generic and antiquated. Should be evaluated on a case by case basis.

Design Standards: Draft Notes

- These dimensions do not work for smaller projects and are generally required for much larger multifamily projects that have the room.
- Trees should be a goal but evaluated on a case by case basis.

Page 25 | Multi-Use Driveway

- These two requirements are only valid for surface parking and should be removed.

Page 26-27 | Parking

- This is redundant.

Page 38 | Mixed Use Overlay District Development Standards

- Maximum lot coverage should be removed and evaluated on a case by case basis.
- Remove Minimum unit sizes or relabel them to show a range of sizes.
- Maximum building heights and stories should have an asterisk next to them that describes how they can be increased by State ordinances.
- Maximum floor area per floor by story should be removed.
- Maximum building length should be evaluated on a case by case basis.
- Maximum elevation above street level should be removed.

Page 39 | Mixed Use Overlay District Development Standards

- The minimum tenant space width should be removed.
- For Setbacks for Non-Residential, please omit "to 15 ft", which would not allow a larger plaza or public open space, which may be more desirable than just 15 ft.
- 20 and 25 ft setbacks for rear yards are excessive.
- 15 ft is standard for a rear setback and should not step back at higher levels.
- Excessive rear yard setbacks do not make sense for projects. If a mixed use or multi story project is adjacent to a

residential zone, an encroachment plane is often a better way to mitigate building height adjacent to single family.

Page 40 | Mixed Use Overlay District Development Standards

- Remove guest parking requirement.
- The market should determine the amount of parking provided in a project that is within 1/2 mile of a transit station.

Page 41 | Mixed Use Overlay District Development Standards

- Minimum driveway and parking side landscaping does not apply to mixed use projects unless they have ample land to provide surface parking.
- 1,000 sf minimum Common Open Space area and 25 ft minimum dimension is super excessive and only related to huge multifamily projects. This should be stricken.

We hope you find our comments and suggestions helpful and look forward to your comments.

Sincerely,

Dwight Bond, AIA
Director of Design

ATTACHMENT 1

Draft Objective Development Standards (ODS) Toolkit

Objective Development Standards Toolkit

Prepared for the City of South Pasadena
September 2023

DRAFT



Contents

I. Introduction..... 2
Background..... 2
Toolkit Objectives 3
Informing the Toolkit 4

II. Mixed-Use Standards 5
Form & Scale 5
Frontages..... 10
Open Space..... 14
Parking..... 15

III. Multi-Family Standards 18
Form & Scale 18
Frontages..... 21
Open Space..... 32
Parking..... 26

I. Introduction

Background

California must plan for more than 2.5 million homes in the next eight-year planning cycle (2021-2029), including 2,067 in South Pasadena. This need for additional dwelling units due to the statewide housing shortage has led to the passage of laws such as Senate Bill 35 (Streamlining Approvals), Senate Bill 167 (Removing Barriers), and Senate Bill 330 (Expediting Residential Development), to produce more housing to meet the growing needs of Californians during the ongoing housing crisis. Cities must ensure they are complying with all aspects of State law and not hindering the development of housing, so these new laws have prompted cities across California to review residential development and design standards to make them simpler to understand and easier to implement, resulting in faster permitting timelines to encourage housing production.

Each city has zoning regulations that establish the rules for all development (including residential, commercial, industrial, and other uses), in the form of development standards. These include building height, the number of units allowed per parcel, the distance between buildings and adjacent properties, the amount of open space needed on a site, parking requirements, building design standards, and more. Standards that influence the design of a structure or open space are also typical, including articulation/modulation, roof line variation, transparency, lighting, and parking screening.

To align with the State's needs and goals for housing production, cities and counties are updating and adding to existing regulations and guidelines to create standards that can be "objectively" reviewed by City staff. Objective standards use measurable requirements, simple tables and diagrams, and require no personal or subjective judgment to determine if the standards have been met. This allows for a straightforward administrative process that reduces timelines, adds certainty, and achieves reasonable design goals.

Project Grant Funding

The City of South Pasadena ("City") is part of a project funded by the Southern California Association of Governments (SCAG) through the State's Regional Early Action Planning (REAP) Grant Program to document, assess, and modernize multi-unit and mixed-use objective standards and permitting. This project is serving the cities of Montebello, Santa Fe Springs, Santa Monica, and South Pasadena. It will help support a greater understanding of the role of objective standards in increasing housing production in Los Angeles County and throughout California.

SCAG's Regional Council approved the 2020 Sustainable Communities Program (SCP) Housing and Sustainable Development (HSD) Call for Applications in November 2020. The goal of the SCP is to implement the policies and programs of Connect SoCal, the 2020 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). With the 2019-2020 Budget Act, \$250 million was budgeted to prioritize planning initiatives that would increase housing production to meet the needs of every community throughout the state. The California Department of Housing and Community Development (HCD) received \$125 million of this funding to establish REAP Grant Program. REAP provides one-time grants to regional entities for planning activities that facilitate compliance in implementing the sixth cycle of the Regional Housing Needs Allocation (RHNA). This includes efforts to accelerate housing production – such as the development of objective standards.

Toolkit Objectives

The purpose of this toolkit is to develop a menu of objective standards for a selection of mixed-use and multi-unit zones for each of the four cities to consider for incorporation into their Zoning Code. This document is intended to be reviewed and distributed by city planning staff, and codified as appropriate.

The standards are designed to:

- Translate existing applicable Zoning Code regulations and design guidelines into clear, objective standards in plain language, supplemented with explanatory graphics, making the standards easy to understand and simple to implement in compliance with Senate Bill 35
- Integrate with the maximum density allowed consistent with Senate Bill 330
- Allow for flexibility to adapt to market fluctuations, trends, and shifting demand
- Focus on zones that apply to the highest volume potential development type and locations
- Inform building form and site planning

The toolkit is designed to:

- Make it easier for applicants to understand the regulations
- Be the foundation for the development of standards for multi-unit/mixed use projects that support higher levels of design, confirming compliance through an administrative process
- Create greater certainty in the review process and streamline project approvals
- Encourage housing production so the City can meet its state-mandated Regional Housing Needs Allocation (RHNA) goals
- Comply with SB35, which requires qualifying projects to be reviewed against objective standards¹

Two sets of standards were developed to be shared across each of the four cities served by the project for Mixed-Use and Multi-Family (Medium-Density) Residential zone prototypes. The standards developed for the two highest priority zones have been tested on prototypical sites to ensure the standards enable intended development, allow for maximum density, and provide the appropriate level of regulation. [Note that general development standards such as height limits, floor area ratios, and minimum setbacks are not included in this toolkit as they are already in the City's Zoning Code.]

For the most part, the following standards are designed to scale to different densities and building heights, so the same or similar standards can be used across zoning districts regardless of development intensity. This is an effort to simplify the code and ease understanding for the benefit of applicants, staff, and the public. As this is a toolkit of recommendations, standards selected by the City to propose for inclusion in the Zoning Code may need further refinement from City staff to customize based on the City's unique requirements and approaches, including different measurement definitions and contextual considerations.

¹ Senate Bill 9 also requires use of objective standards for related project reviews in single-family zones; separate from this SCAG project focused on multi-unit/mixed-use zones.

Informing the Toolkit

The project included a high-level technical analysis of existing policy documents, development standards and regulations, design guidelines, permit procedures, and recently approved projects and submitted applications under review to understand:

- How the City currently processes applications and how long the process typically takes; and
- How standards are being interpreted and applied during the permitting and entitlement process.

This analysis included a review of the General Plan Land Use and Housing elements and associated policies, the City's Zoning Code and specific plans, as well as a handful of representative housing development projects. It resulted in initial findings and recommendations to inform the standards developed for the toolkit and other related actions for City consideration.

Public Engagement

South Pasadena undertook an engagement process to provide information to community members about the objective development standards and streamlined permitting project, and gather input to inform the creation of the recommended standards in the toolkit. The following outreach events were held to engage the public, stakeholders, and decision-makers in ways that result in meaningful participation.

- **Planning Commission Study Session:** This event was held on July 12, 2022, to inform the City's decision-makers at the Planning Commission about the project and relevant State laws to collaborate on locally appropriate solutions to increase capacity potential and accelerate housing production.
- **Public Workshops:** Two community workshops focused on building an understanding of objective standards and providing the public with an opportunity to give feedback on draft materials. The first workshop was held at the Design Review Board meeting on September 1, 2022. The second was held at the Planning Commission meeting on June 13, 2023.
- **Final Project Presentation:** The final presentation will be a joint presentation to the Planning Commission and Design Review Board in September of 2023, providing background, analysis, and a summary of the proposed objective standards and other project deliverables.

II. Mixed-Use Standards

Form & Scale

THIS TABLE IS HELPFUL. WHAT ARE PERCENTAGES BASED ON. SEEM RANDOM

Setbacks & Streetwall

Potential supplemental standards related to setbacks and streetwalls are provided below. In addition, the City may consider further defining the “minimum building frontage” standard from the Mixed Use Overlay District Development Standards table with additional text to make the standard more explicit. Note that the version below allows three feet of flexibility, which is slightly different than the table implies.

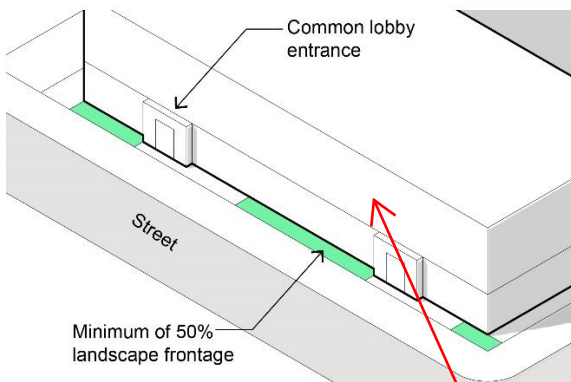
Minimum building frontage. Buildings shall be located within 3 feet of the minimum setback for at least 60 percent of the building frontage along the primary right-of-way and 50 percent along any secondary right-of-way, excluding alleys.

Residential units. Residential units on the ground floor shall have a minimum setback of 5 feet.

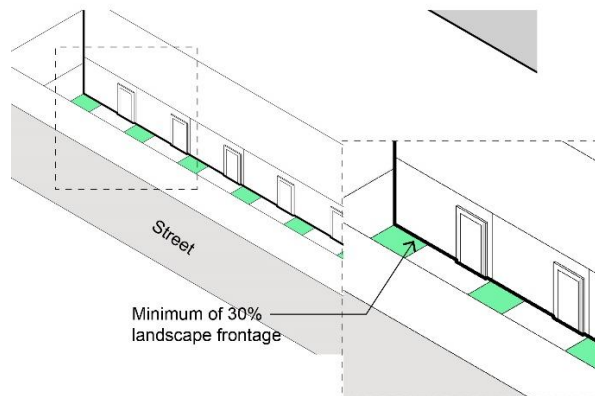
Landscaping in setbacks. For buildings set back 5 feet or more, a minimum percentage of the setback area shall be landscaped with trees, shrubs, and/or groundcover, either in the form of in-ground landscaping or planters, as follows:

Frontages with shared entrances to internal circulation	50%
Frontages with individual residential unit entrances	30%
With a stoop taller than 30 inches	10%
Frontages with individual commercial tenant entrances	30%
With outdoor dining	10%

Frontages with shared entrances to internal circulation

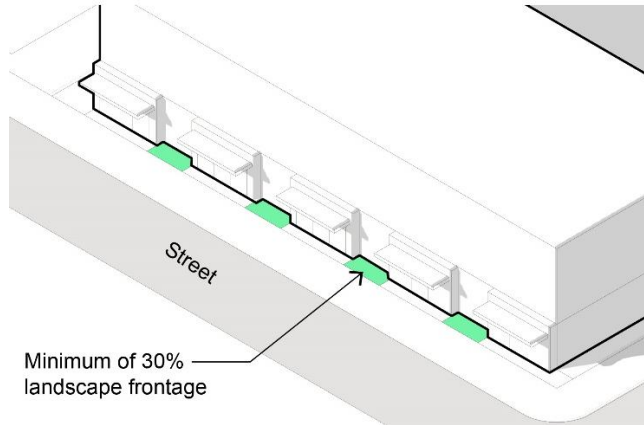


Frontage with individual residential unit entrances

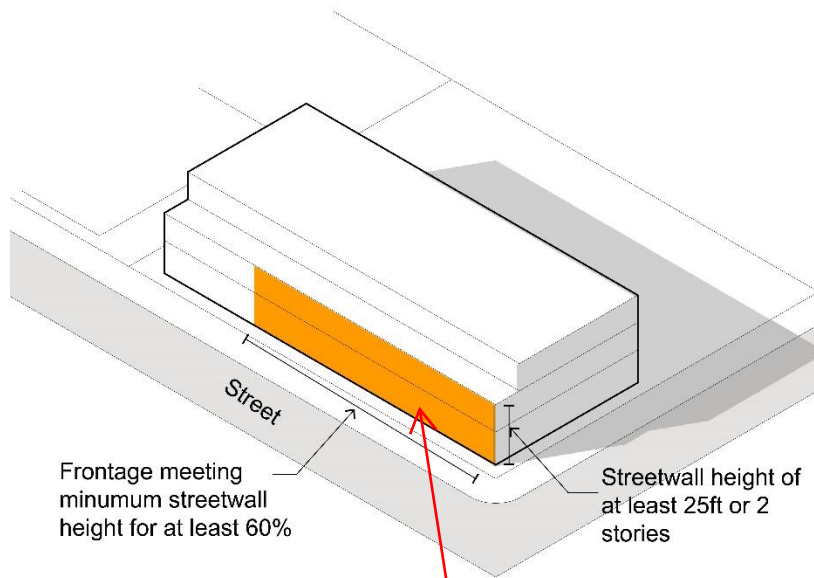


PLEASE CLARIFY IF THIS MODEL IS BASED ON 100% RESIDENTIAL, NO COMMERCIAL / MIXED USE. NOT PRACTICAL FOR COMMERCIAL USES

Frontages with commercial tenant entrances



Streetwall: Street-facing facades shall meet or exceed 25 feet (or 2 stories in height) for at least 60 percent of building frontage along public rights-of-way, unless the overall building height is lower than 2 stories. The streetwall is not required to be continuous.



60% REQ. SEEMS GOOD WHICH ALLOWS 40% PUSH AND PULL OF THE FACADE, OUTDOOR DINING, COURTYARDS, ETC.

THERE SHOULD BE LANGUAGE ALLOWING CANTILEVER OVER STREET WALL, PROP LINE, ETC.

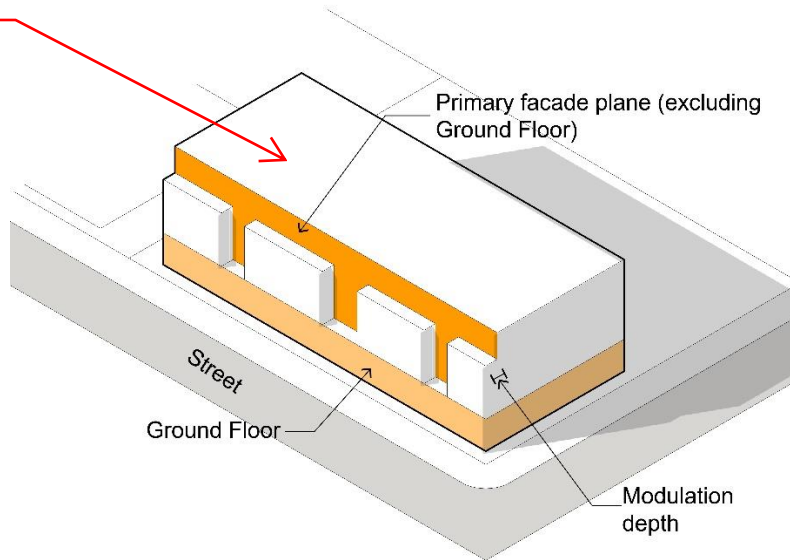
Modulation

Potential supplemental standards related to modulation are provided below.

Façade modulation: Street-facing façades of 50 feet or longer shall modulate a minimum of 25 percent of the area above the ground floor between 2 and 12 feet in depth from the primary façade plane, defined as the vertical plane above the ground floor with the greatest surface area.

Modulation shall be a minimum depth of 2 feet, may be recessed or **projected** (but not beyond the minimum setback), and is not required to be continuous or open to the sky.

THERE SHOULD BE AN EXAMPLE SHOWING PROJECTED EXAMPLE ALSO.



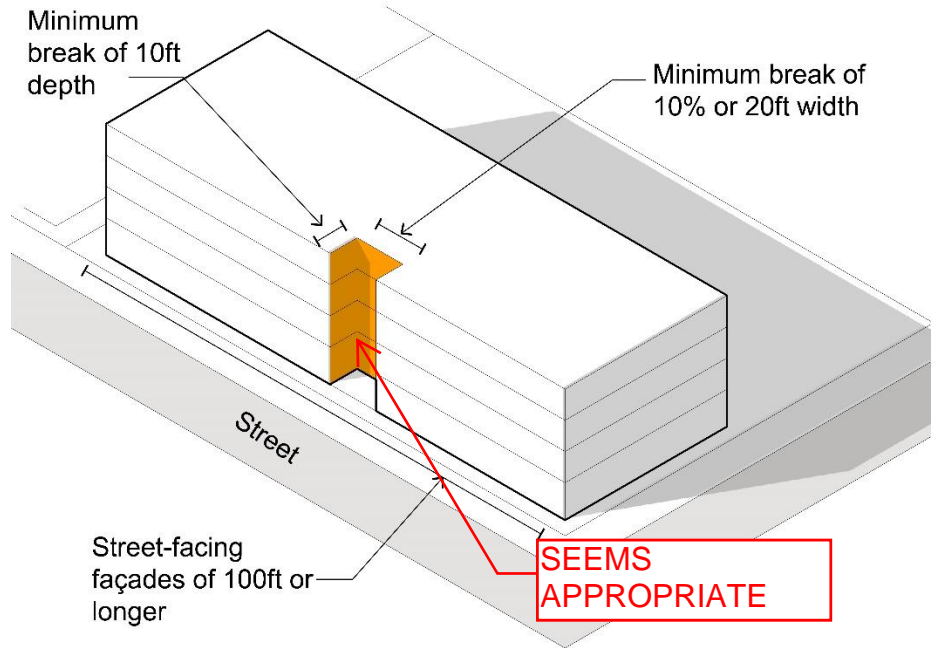
Exception for façades that meet all the following standards:

- 1) All windows shall be recessed at least 4 inches.
- 2) The maximum façade length shall be 75 feet.
- 3) The façade shall use a textural material of brick, stone, precast concrete, Venetian plaster, hand-troweled stucco, or porcelain tiles at least 12 by 4 inches. Ceramic tiles, porcelain tiles less than 12 by 4 inches, standard stucco, or flat, polished stone shall not qualify.
- 4) Façade shall employ a tripartite division in which the façade is organized into three horizontal sections with a base, middle, and top.
 - a) The middle section shall be differentiated from both the base and the top through a change in façade plane of at least 4 inches, or a consistent horizontal band that projects at least 4 inches from the façade.
 - b) The top section shall use a cornice that is at least 1 foot in depth.

WHY DOES THE ARCHITECTURE NEED TO BE CLASSICAL OR TRADITIONAL AS IMPLIED IN THE EXCEPTIONS? I WOULD PROPOSE STRIKING THIS SECTION FOR LACK OF VARIETY AND INDIVIDUAL EXPRESSION IN CONTEMPORARY DESIGN

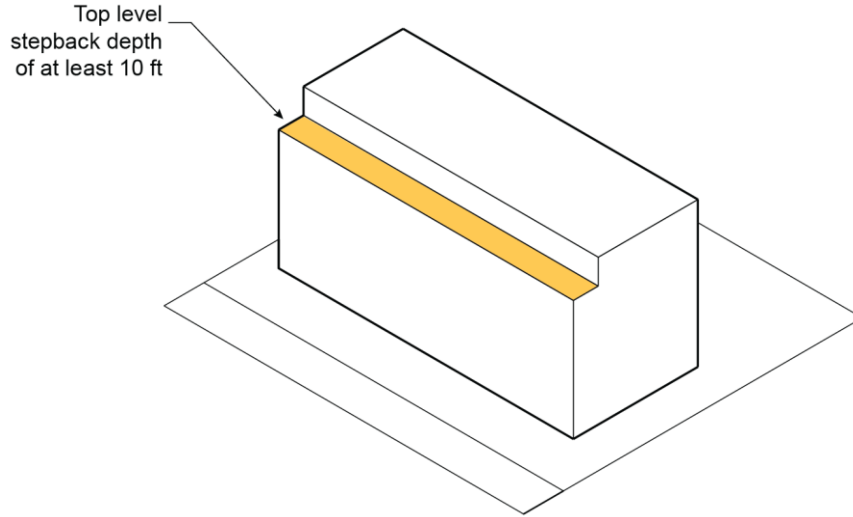
DRAFT

Façade length: Street-facing façades of 100 feet or longer shall include a minimum break of 10 percent of the façade length or 20 feet in width, at least 10 feet deep and open to the sky.



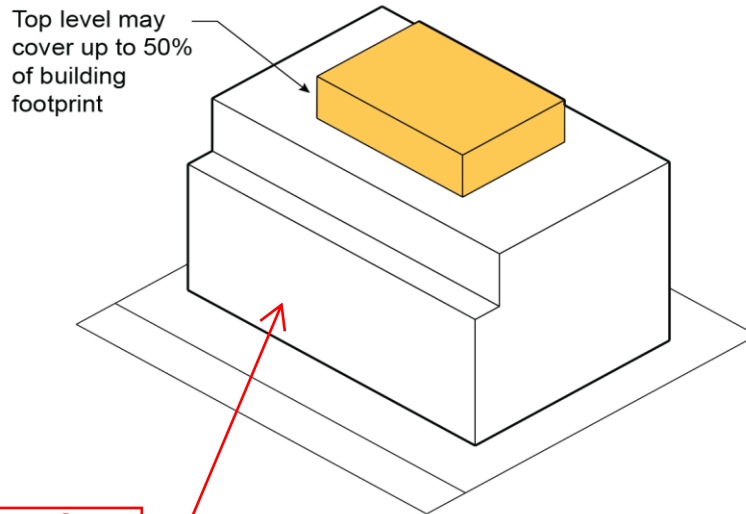
Roofline variation: For buildings over 45 feet in height, the upper-most level shall use one of the following:

Street setbacks: The upper-most level shall be stepped back a minimum of 10 feet from street-facing building façades.



– OR –

Building footprint: The upper-most level shall cover a maximum of 50 percent of the building footprint.



FEELS RANDOM

A red rectangular box containing the text 'FEELS RANDOM' is positioned below the diagram. A red arrow points from the right side of the box towards the bottom-left corner of the building's footprint in the diagram above.

Frontages

Ground Floor

THIS IS A GOOD STANDARD BUT SHOULD BE EVALUATED ON A CASE BY CASE BASIS

Standards

Potential supplemental standards related to frontages are provided below. Note that we have included an expanded version of the ground floor height standard from the Mixed Use Overlay District Development Standards, which specifies a commercial ground height minimum of 15 feet, measured floor to floor. It is not clear from the table how ground floor height is measured.

Ground floor uses: Commercial uses on the ground floor along boulevards shall have a minimum average depth of 35 feet, but in no case be less than 20 feet, for a minimum of 60% of the ground-floor frontage.

Floor height: Ground floor commercial, non-residential, and residential common spaces shall have a minimum height of 15 feet, measured floor-to-floor. Ground floor residential units shall have a minimum height of 12 feet, measured floor-to-floor.

Horizontal element: Buildings with a ground floor height of 16 feet or greater, measured floor-to-floor, shall incorporate a horizontal element between 9 and 14 feet above sidewalk elevation. Elements may be continuous or intermittent, and may include:

- a) A canopy, awning or other covering;
- b) Architectural projection;
- c) Change in façade material
- d) Signage band; and/or
- e) Trellis.

Vertical elements: Frontages shall be designed to be divided into bays that are 30-feet wide or less by pilasters, columns, window patterns, or other vertical elements.

Entrances. Street-facing façades shall provide a minimum of one entrance per 100 feet of frontage that opens directly onto the sidewalk or another public open space.

Entrances shall be set back at least 30 inches from the public right-of-way.

Primary entrances shall be distinguished by at least one of the following:

- a) Awning/canopy
- b) Overhang/recessed entry
- c) Porch/portico
- d) Trellis

Transparency: Street-facing façades shall incorporate glazing for a certain percentage of the building frontage between 2 and 10 feet in height from sidewalk elevation. Windows shall provide views into display, lobby, sales, work, or similar active areas.

For non-residential and residential common space uses, at least 50 percent of the frontage shall be transparent.

For ground floor residential units, at least 15 percent of the frontage shall be transparent.

DRAFT

Windows shall have a visible transmittance (VT) of 0.6 or higher.

Blank walls: Windowless expanses of walls on the ground floor shall not exceed 25 feet in length. Blank walls over 10 feet in length shall be enhanced by one of the following:

- a) Pattern, motif, etching, or similar decoration;
- b) Landscaping that covers at least 50 percent of the wall area;
- c) Trellis or similar projection;
- d) Public art approved by review authority.

Security bars: Any security bars shall be designed to be fully concealed and hidden from view during business hours.

Stoops and patios: The side of a patio or stoop (when parallel to a sidewalk) taller than 30 inches shall be set back a minimum of 18 inches from the property line, separated by planted area.

Fences and walls: For non-residentially zoned parcels, ground floor private outdoor living areas adjacent to a street shall have a maximum fence, wall, or hedge height of 5 feet. Any portion above 42 inches shall be at least 50 percent transparent.

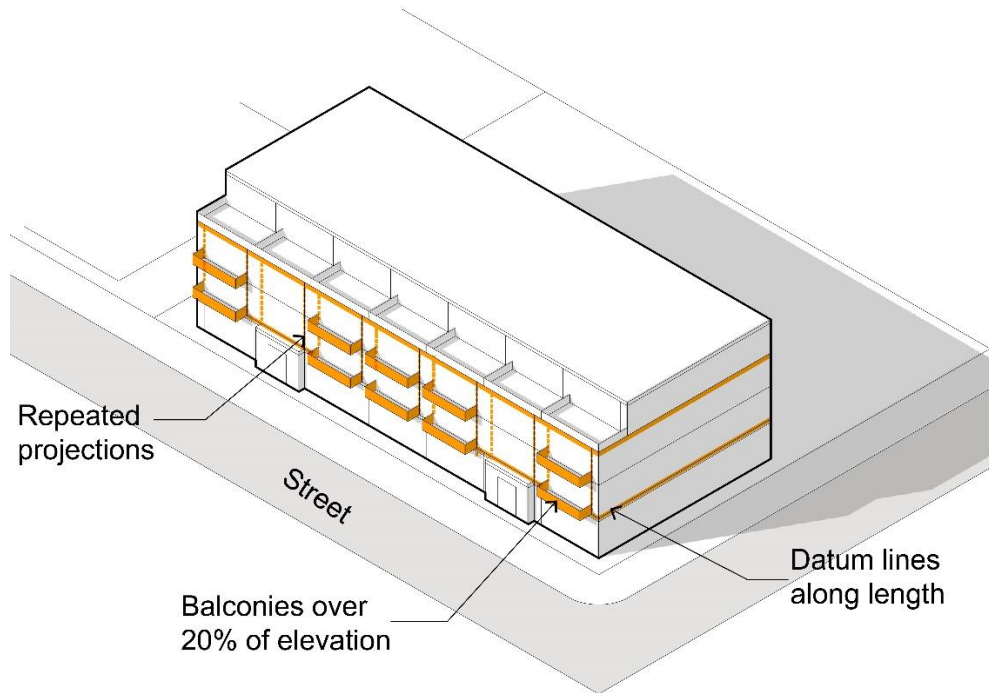
Barbed wire, chain-link, and razor wire shall be prohibited.

Concrete masonry unit walls shall be treated with stucco coating.

Façades

Composition: Street-facing façades shall include at least three of the following:

- a) Pattern of modulation or fenestration;
- b) Datum lines along the length of the building (e.g. cornice) at least 4 inches in depth;
- c) Repeated projections (e.g. architectural detail, shading) at least 4 inches in depth;
- d) Balconies over 20 percent of the elevation;
- e) Screening (e.g. lattices, louvers);
- f) Individual exterior material not to exceed eight inches in a visible dimension (e.g. brick).

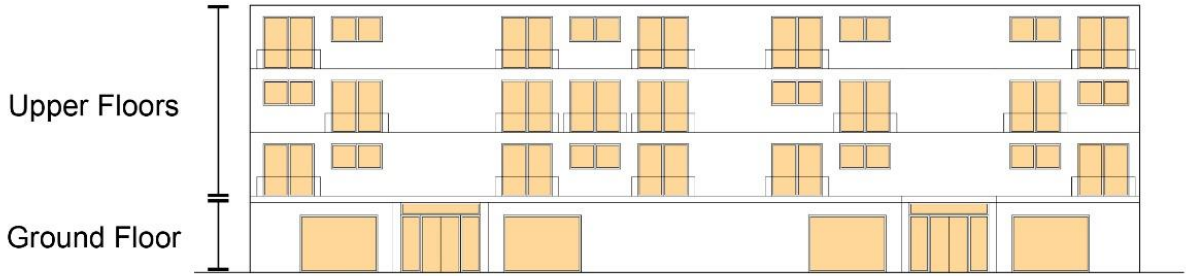


Corner treatments: Corner-facing facades of 75 feet or longer shall incorporate at least two of the following elements within 50 feet of the building corner along the primary frontage:

- a) Building entrance;
- b) Change in height of at least 4 feet for an area 10 feet by 10 feet minimum;
- c) Change in façade plane on upper stories of at least 2 feet in depth;
- d) Change of material or texture;
- e) Publicly-accessible open space or outdoor dining.

Transparency: Street-facing façades shall incorporate glazing for at least 30 percent of the façade, including ground floor transparency.

At Least 30% of glazing including Ground Floor



Windows: Windows shall be recessed at least 3 inches from the face of the façade; flush windows may be permitted per review authority approval. Mirrored, tinted or highly reflective glazing is prohibited. Vinyl windows are prohibited.

Materials: A minimum of two materials shall be used on any building façade, in addition to glazing, railings, and trim, and shall correspond to variations in building plane.

Material transitions shall occur at the inside corner of a plane change. When material changes occur in the same plane, projecting or recessed architectural elements shall be used to create a corner for material transition.

A primary material shall cover at least 40 percent of any building façade, excluding windows.

No more than four colors shall be applied to the building façade (one primary color and up to three other colors), excluding art (e.g. a mural).

Balconies: Balconies shall project a maximum of 4 feet from the building façade and shall not be located within 6 feet of any interior property line.

Roof decks: Roof decks located within 25 feet of a Residential zoning district shall be set back a minimum of 5 feet from the building edge. The sum of all roof decks on a single building shall not exceed 60 percent of the roof area to allow for mechanical equipment including solar panels.

Lighting: All structures, entrances, parking areas, common open spaces, and pedestrian pathways shall be lit from dusk to dawn.

Lighting shall be full cutoff with a minimum of 90 percent of the light directed downward and designed to illuminate only the intended area.

Lighting shall not extend beyond an interior property line, and light sources shall not be visible from adjacent properties.

Screening: All exterior mechanical and electrical equipment visible from a public street shall be screened on all vertical sides to the height of the equipment it is screening.

PLEASE CLARIFY,
HOW IS THIS
POSSIBLE?

Open Space

THIS DOESN'T MEET ADA. NEEDS TO BE 5 FT NOT 4 FT.

Private Open Space

Access: Private Open Space shall abut and have direct access to the associated tenant space.

Dimensions: Private Open Space shall have a minimum area of 40 square feet and a minimum dimension of 6 feet in width by 4 feet in depth in each direction.

Distribution: All Private Open Space shall be outdoors and may be located within a required setback or stepback.

THIS IS AN ANTIQUATED REQUIREMENT AND GENERIC AND ONLY APPROPRIATE FOR LARGE MULTIFAMILY PROJECTS, NOT SMALLER ONES. A VARIETY OF OPEN SPACE SHOULD BE ENCOURAGED.

Common Open Space

Access: Common Open Space shall be available to all tenants of the building at no cost.

Dimensions: Common Open Space shall have a minimum area of 400 square feet and a minimum dimension of 20 feet in each direction.

Distribution: A minimum of 70 percent of Common Open Space shall be outdoors, and a minimum of 80 percent of outdoor Common Open Space shall be open to the sky.

A maximum of 30 percent of Common Open Space shall be indoors (i.e. lounges, fitness centers, and similar). Indoor Common Open Space shall not include spaces primarily used for circulation.

Landscaping: A minimum of 25 percent of Common Open Space shall be planted area with a minimum dimension of 30 inches in length, width, and depth.

Trees: A minimum of one 24-inch box tree per project or for every 500 square feet of outdoor Common Open Space, whichever is greater, shall be planted within the Common Open Space. At least 50 percent shall be shade trees.

Hardscape: A maximum of 25 percent of Common Open Space may be paved in standard concrete, with the remainder using enhanced paving such as brick, natural stone, unit concrete pavers, textured/colored concrete, or similar.

Water features: No greater than 5 percent of Common Open Space shall be decorative water features, such as fountains or reflecting pools.

A GOOD GOAL, BUT SHOULD BE EVALUATED ON A CASE BY CASE BASIS

Parking

DRIVEWAYS DO NOT NEED TO BE 24 FEET WIDE. THIS IS ONLY APPROPRIATE FOR LARGE PROJECTS. DRIVEWAY WIDTH SHOULD BE A FUNCTION OF THE NUMBER OF CARS SUPPORTING IT. DRIVEWAYS CAN BE ONLY 10 FT WIDE IF SUPPORTING LESS THAN 25 CARS, FOR INSTANCE. DRIVE AISLES CAN BE 24 FT, NOT DRIVEWAYS.

Vehicle Access

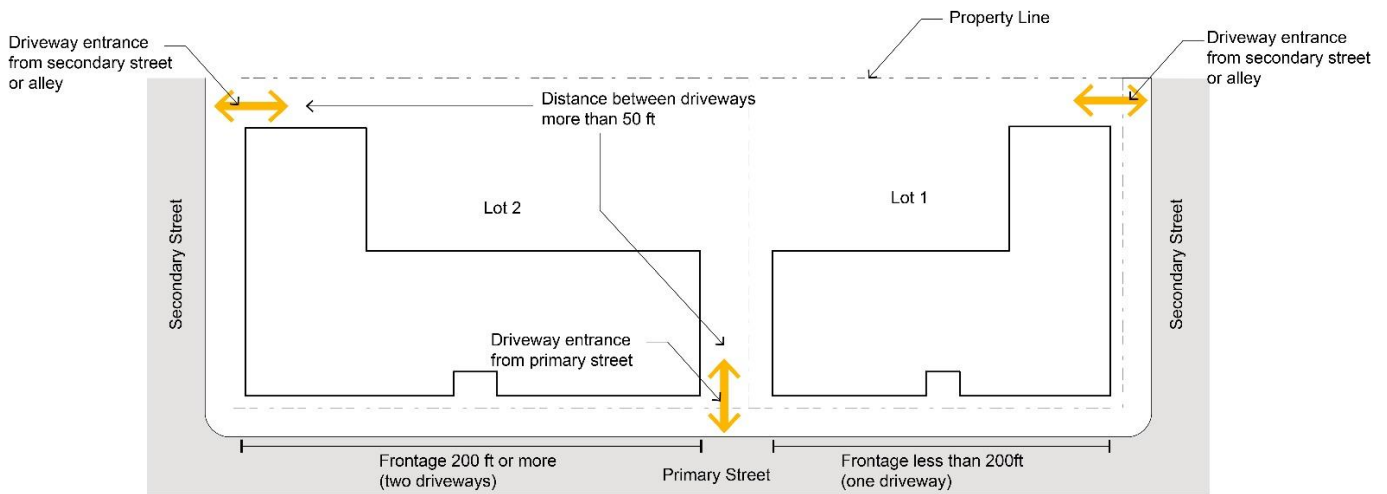
Driveways: A maximum of one two-way driveway shall be permitted on sites with less than 200 feet of primary street frontage. A maximum of two two-lane driveways shall be permitted on sites with 200 feet or more of primary street frontage.

CASE BY CASE

Driveways and associated curb-cuts shall have a maximum width of 24 feet.

The minimum distance between driveways on the same lot shall be 50 feet.

Controlled entrances to parking (e.g. gates) shall be located at least 20 feet from the property line to allow for a queueing vehicle.

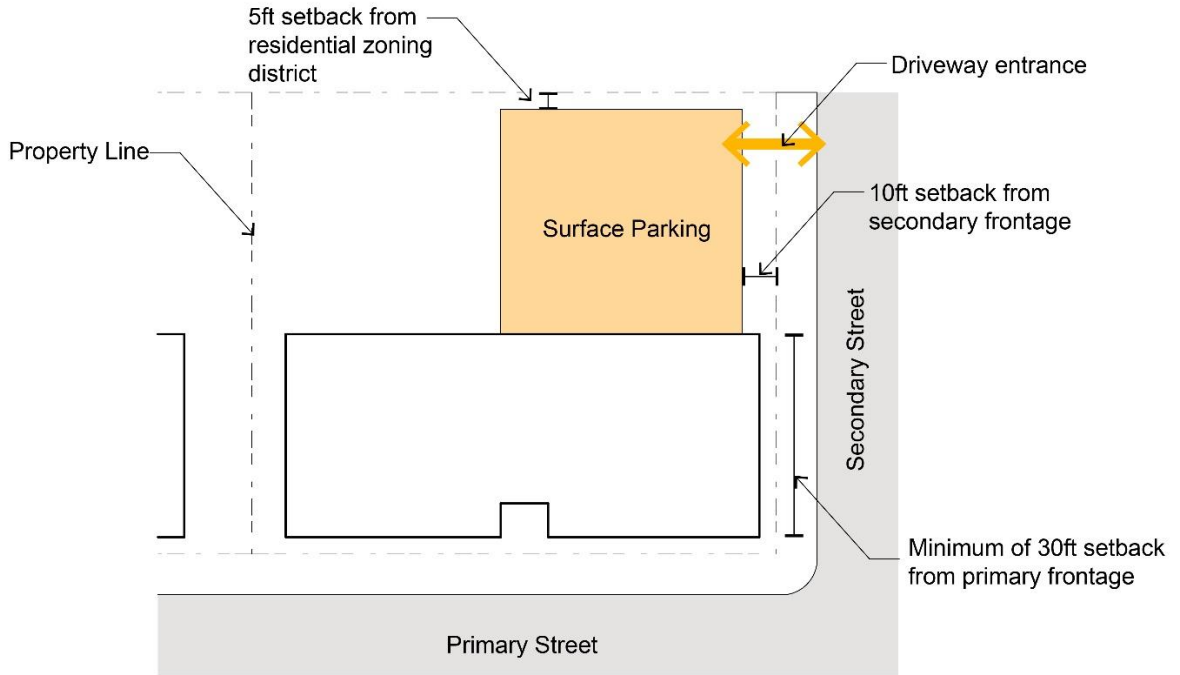


Surface Parking

Setbacks: Parking shall be set back a minimum of 30 feet from the primary frontage, 10 feet from any secondary frontage, and 5 feet from any adjacent Residential zoning district.

Parking shall be buffered by permitted non-parking uses or a landscaped setback adjacent to the property line, except for vehicle/pedestrian access.

Landscaped setbacks shall include hedges or shrubs with a minimum height of 3 feet at the time of planting that form a continuous visual screen to block vehicle headlights.



Landscaping: A minimum of 5 percent of the parking area shall be landscaped and permeable, in addition to any landscaped setbacks. This area shall be distributed throughout the parking area.

Trees: A minimum of one shade tree for every 4 vehicle parking spaces shall be planted and evenly distributed throughout the parking area.

Structured Parking

Setbacks: Structured parking shall be set back a minimum of 5 feet from any adjacent Residential zoning district.

Above ground parking shall be buffered by permitted non-parking uses with a minimum depth of 35 feet adjacent to the street property line, except for vehicle/pedestrian access.

Semi-subterranean parking shall not extend beyond the building façade and may not project higher than four feet above sidewalk elevation.

Parking areas with controlled entrances, including access gates, shall accommodate at minimum the length of one vehicle without queuing into the public right-of-way.

CALIFORNIA GREEN CODE SHOULD DETERMINE THIS. STRIKE IT.

Electric Vehicle Charging Stations

Minimum Number:

~~In projects that include 25-49 parking spaces, one Level 2 charging station shall be provided.~~

DRAFT

For each additional 50 spaces or portion thereof beyond 49 spaces, one additional Level 2 charging station shall be provided.

Each charging station shall be installed at a designated standard size parking space.

Signage shall be installed specifying spaces with charging stations for electric vehicles only.

Associated equipment shall not encroach on the minimum required clear areas from driveways, parking spaces, or maneuvering areas.

Any spaces reserved for electric vehicle charging stations shall count toward minimum parking requirements.

III. Multi-Family Standards

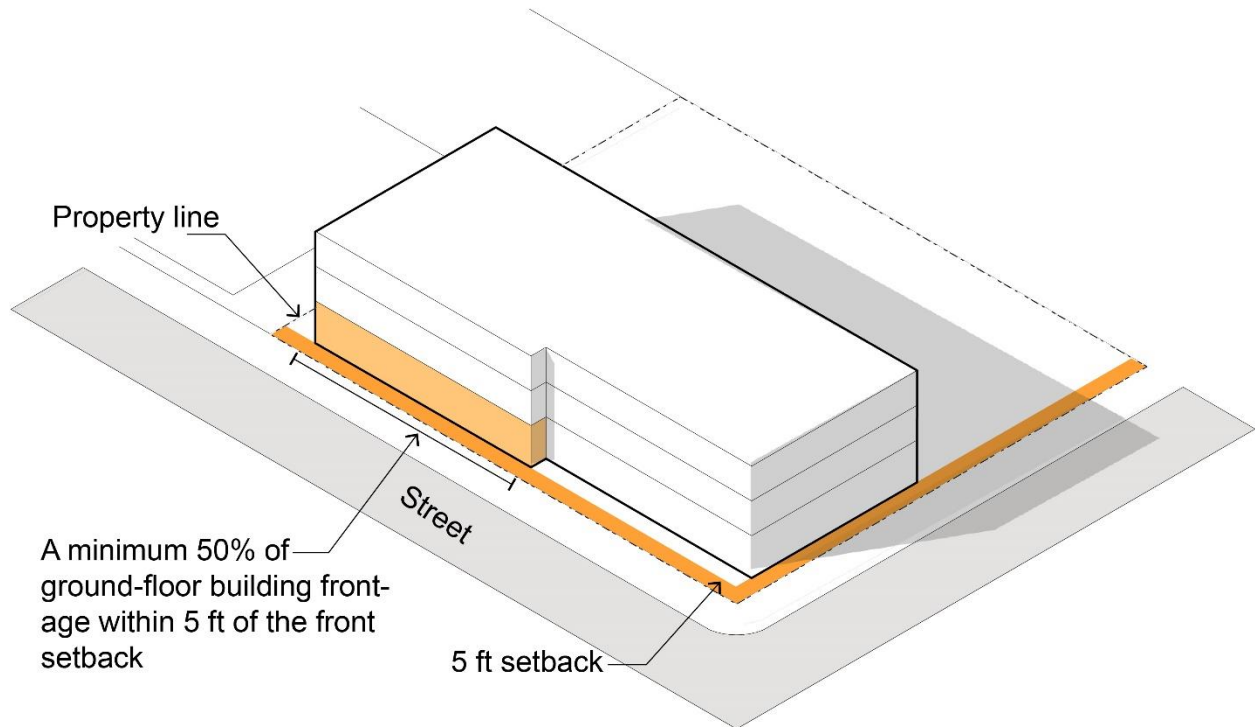
Form & Scale

Setbacks

Standards

STRIKE. SHOULD BE CASE BY CASE, AGAIN A GOOD GOAL, BUT SHOULD NOT BE A REQUIREMENT

Setbacks: Buildings shall be set back a minimum of 5 feet from the property line. A minimum of 50 percent of ground-floor building frontage shall be placed at or within 5 feet of the front setback.



Corner buildings: On corner lots, buildings must be placed at or within 5 feet of the setback line for a minimum of 25 feet along the front and street side setback lines.

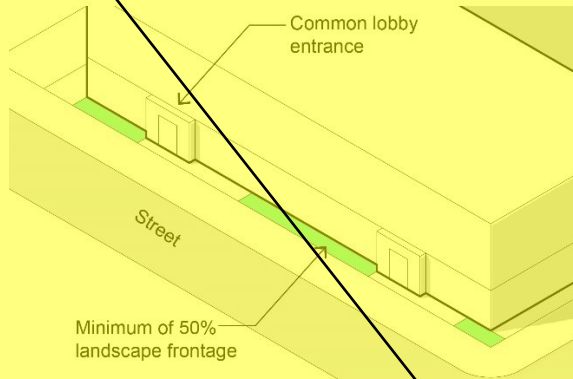
CASE BY CASE

DRAFT

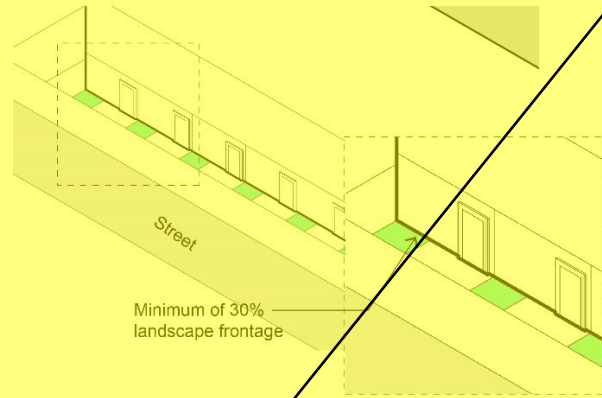
REDUNDANT

Landscaping: Setbacks shall be landscaped except for driveways and pedestrian paths.

Frontages with shared entrances to internal circulation



Frontage with individual residential unit entrances

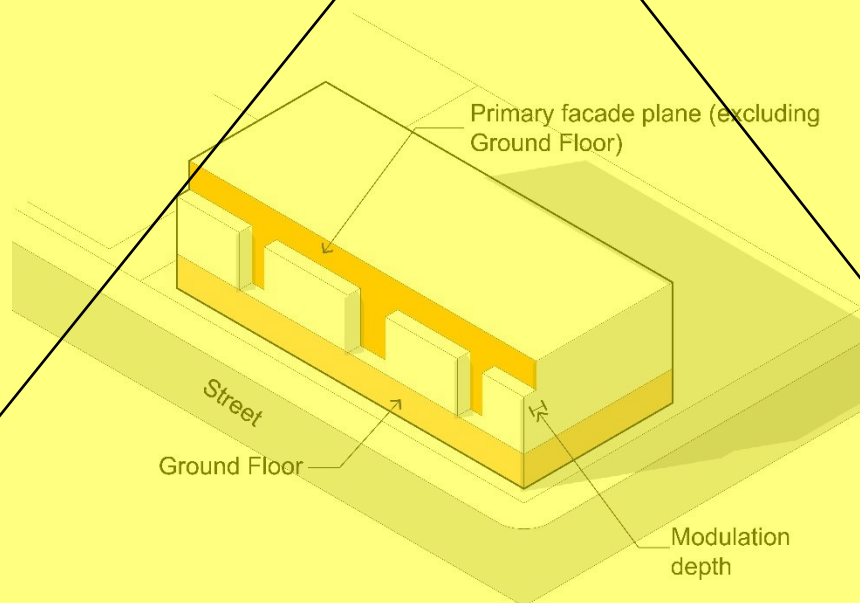


Modulation

Standards

Façade area: Street-facing façades of 50 feet or longer shall modulate a minimum of 25 percent of the area above the ground floor between 2 and 12 feet in depth from the primary façade plane, defined as the vertical plane with the greatest surface area above the ground floor.

Modulation shall be a minimum depth of 2 feet, may be recessed or projected (but not into the public right-of-way), and is not required to be continuous or open to the sky.



Building length: Buildings shall be no longer than 6 units or 150 feet in length, whichever is less, with a minimum separation of 10 feet between buildings.

Façade modulation. Street-facing façades over 2 stories in height shall incorporate two of the following:

- a) A sloped roof with a pitch greater than 3/12.
- b) A flat roof with a minimum 2-foot vertical height difference for a minimum of 10 feet in length and depth.
- c) A top-level stepback of at least 2 feet for a minimum of 25 percent of the length of the façade.
- d) An open deck at least 5 feet in depth and 8 feet in width.

Façade break. Façade planes facing RE, RS, or AM zoning districts shall not exceed 45 feet in width without a façade break of at least 5 feet deep and 10 feet wide.

Roofline variation. Street-facing façade planes over 45 feet in length shall incorporate a variation of roof form, shape, type, or height of at least 5 feet.

Frontages

Ground Floor

Entrances: Residential units located adjacent to a street shall have a primary entrance facing the street.

Entrances shall have a minimum 3-foot covered landing area at the same grade as the interior floor.

Entrances shall incorporate at least three of the following:

- a) Recession at least 2 feet from the building façade;
- b) Overhead projection of at least 4 feet in depth (e.g. porch roof);
- c) A sidelight window, adjacent window, or door with a window;
- d) At least one stair, up or down, from the pedestrian pathway;
- e) Paving material, texture, or pattern differentiated from the pedestrian pathway.

STRIKE, CASE BY CASE,
LIVE/WORK WOULD WANT
TO BE ALLOWED TO HAVE
NO LEVEL CHANGE, FOR
ADA REASONS, ACCESS,
ETC.

~~**Elevation:** Buildings shall have a finished floor between 2 and 4 feet above the nearest sidewalk elevation. On sloping sites, up to 25 percent of units may have finished floors up to 6 feet above the nearest sidewalk.~~

Paths: Pedestrian pathways from the sidewalk to all primary entrances and common areas shall have a minimum width of 3 feet, including to lobbies, open space, parking, and refuse collection areas.

Where located parallel to a driveway, a change of material or pattern shall distinguish pedestrian pathways from vehicular travel lanes.

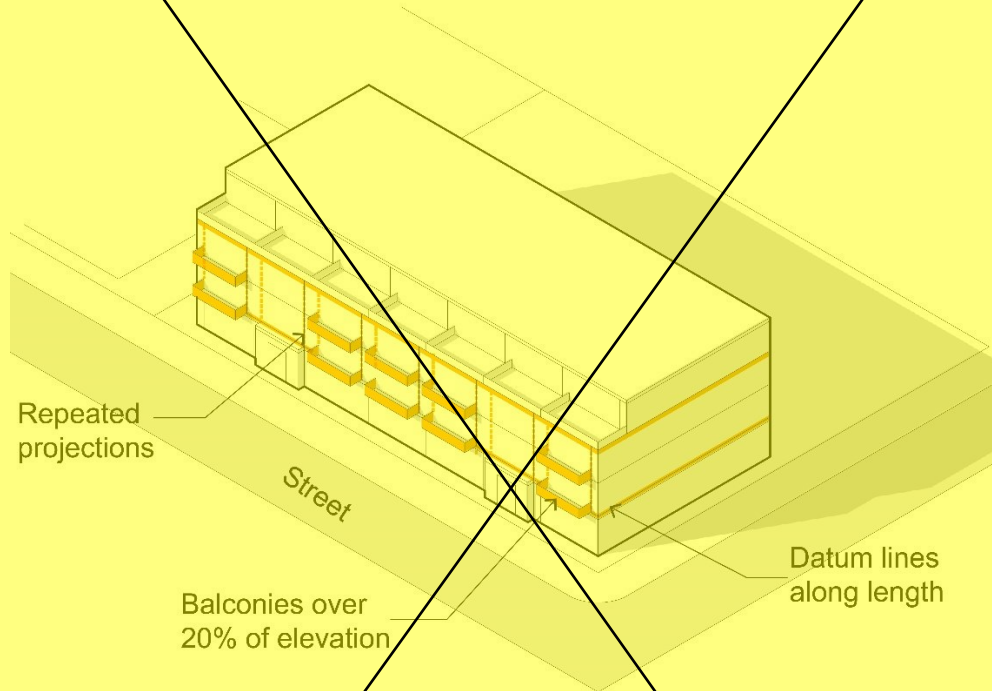
Walls and fences: Freestanding walls, fences, and raised planters taller than 30 inches shall be set back a minimum of 18 inches from the property line, separated by planted area.

Stoops and patios: The side of a patio or stoop (when parallel to a sidewalk) taller than 30 inches shall be set back a minimum of 18 inches from the property line, separated by planted area.

Façades

Composition: Street-facing façades shall include at least three of the following:

- a) Pattern of modulation or fenestration;
- b) Datum lines along the length of the building (e.g. cornice) at least 4 inches in depth;
- c) Repeated projections (e.g. architectural detail, shading) at least 4 inches in depth;
- d) Balconies over 20 percent of the elevation;
- e) Screening (e.g. lattices, louvers);
- f) Individual exterior material not to exceed eight inches in a visible dimension (e.g. brick).



Transparency: Street-facing façades shall incorporate glazing for at least 25 percent of the façade.

Side-loaded townhomes shall incorporate glazing for at least 30 percent of the front-facing façade.

Windows: Windows shall be recessed at least 2 inches from the face of the façade; flush windows may be permitted per review authority approval.

Mirrored, tinted or highly reflective glazing is prohibited.

Vinyl windows are prohibited.

Materials: A minimum of two materials shall be used on any building façade, in addition to glazing, railings, and trim, and shall correspond to variations in building plane.

A primary material shall cover at least 40 percent of any building façade, excluding windows.

No more than four colors shall be applied to the building façade (one primary color and up to three trim colors), excluding art (e.g. a mural).

MUST BE A MINIMUM 5 FT AND SHOULD NOT BE LIMITED IN DEPTH, 8 FT IS MORE USABLE THAN 5 FT, FOR INSTANCE. 5 FT IS BARELY USABLE

Balconies: Balconies shall project a maximum of 4 feet from the building façade, and shall not be located within 6 feet of any interior property line.

~~Side-loaded townhomes shall incorporate at least one front-facing balcony.~~

Lighting: All structures, entrances, parking areas, common open spaces, and pedestrian pathways shall be lit from dusk to dawn.

Lighting shall be located to illuminate only the intended area, and a minimum of 90 percent of lighting shall be directed downward.

Lighting shall not extend beyond an interior property line, and light sources shall not be visible from adjacent properties.

Screening: Rooftop equipment, excluding solar photovoltaic, shall be screened from public view.

Fences and walls: Barbed wire, chain-link, and razor wire are prohibited.

PERCENTAGES ARE WAY TOO HIGH. NOT ALL UNITS WILL HAVE PRIVATE OPEN SPACE. SHOULD BE EVALUATED CASE BY CASE AND DETERMINED BY DESIGN TEAM. SHOULD NOT BASE REQUIREMENTS ON GFA BUT NET FLOOR AREA ONLY

Open Space

Minimum Area

Minimum Open Space shall comply with the applicable design standards depending on type of open space. Areas used for parking, loading, or storage shall not be counted towards minimum Open Space.

- **Residential Open Space:** Projects with a residential component shall provide a minimum of 15 percent of the residential GFA as Private Open Space and 5 percent of the residential GFA as Common Open Space.

Private Open Space

Access: Private Open Space shall abut and have direct access to the associated tenant space.

Dimensions: Private Open Space shall have a minimum area of 40 square feet and a minimum dimension of 5 feet in each direction, with a vertical clearance of at least 8 feet.

Distribution: Private Open Space shall be outdoors and may be located within a required setback.

AS LONG AS THE UNDERSTANDING OF ENCLOSED BALCONIES COUNTS EVEN THOUGH IS IT NOT OPEN TO SKY

Common Open Space

Access: Common Open Space shall be available to all tenants of the building at no cost.

Types: Common Open Space shall be provided by at least one of the following and designed to comply with the associated standards:

- a) Backyard or courtyard on the ground floor;

DOES NOT WORK FOR SMALL PROJECTS

Dimensions: Common Open Space shall have a minimum area of 400 square feet and a minimum dimension of 15 feet in each direction.

Distribution: Common Open Space shall be outdoors, and a minimum of 80 percent of Common Open Space shall be open to the sky.

Landscaping: A minimum of 15 percent of Common Open Space shall be planted area with a minimum dimension of 30 inches in length, width, and depth.

Trees: A minimum of one 24-inch box tree per project or for every 500 square feet of Common Open Space, whichever is greater, shall be planted within the Common Open Space. At least 50 percent shall be shade trees.

Hardscape: A maximum of 50 percent of Common Open Space may be paved in standard concrete, with the remainder using enhanced paving such as brick, natural stone, unit concrete pavers, textured/colored concrete, or similar.

Water features: A maximum of 10 percent of Common Open Space shall be decorative water features, such as fountains or reflecting pools.

- b) Roof deck, terrace, or similar on upper floors;

CASE BY CASE EVALUATION, SHADE TREES ARE NOT ALWAYS THE ANSWER

Dimensions: Common Open Space shall have a minimum area of 400 square feet and a minimum dimension of 15 feet in each direction.

Distribution: Common Open Space shall be outdoors, and a minimum of 80 percent of Common Open Space shall be open to the sky.

Landscaping: A minimum of 15 percent of Common Open Space shall be planted area with a minimum dimension of 30 inches in length, width, and depth.

Hardscape: A maximum of 50 percent of Common Open Space may be paved in standard concrete, with the remainder using enhanced paving such as brick, natural stone, unit concrete pavers, textured/colored concrete, or similar.

Water features: A maximum of 10 percent of Common Open Space shall be decorative water features, such as fountains or reflecting pools.

c) **Multi-use driveway.**

Permeable pavers. The entire surface of the driveway shall be comprised of permeable pavers.

Landscaped buffer. The driveway shall be lined by a minimum 2-foot wide planted area, except at garage entries and pedestrian pathways. If the landscaped buffer is adjacent to a wall, it shall include shrubs or vines of at least 24 inches in height.

STRIKE

Parking

Vehicle Access

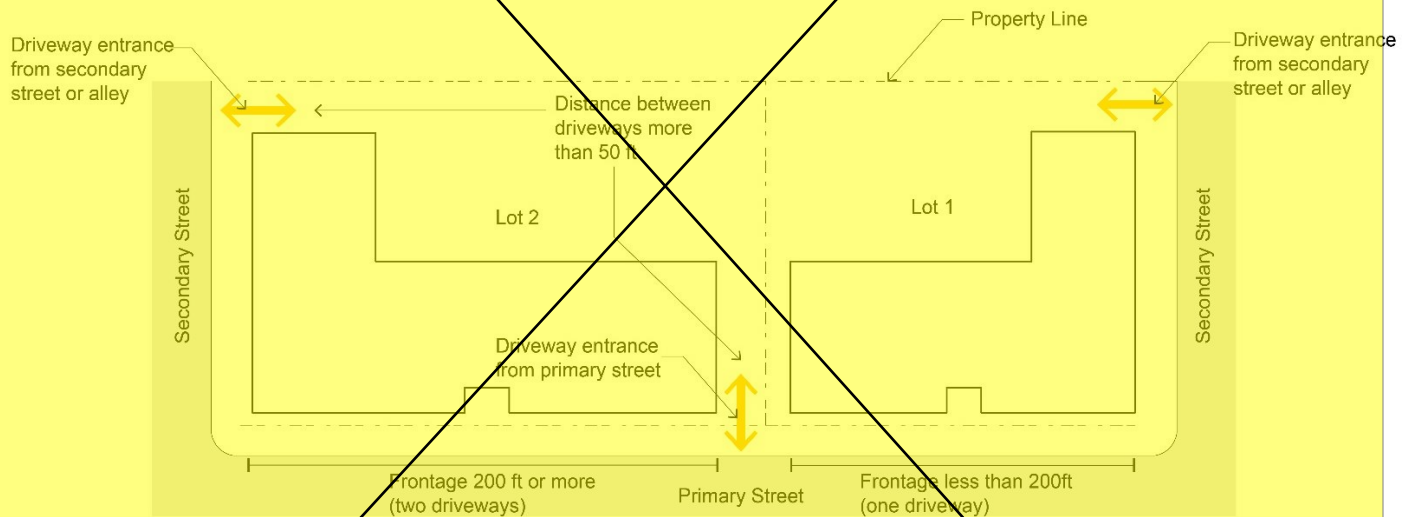
Driveways: A maximum of one two-way driveway shall be permitted on sites with less than 200 feet of primary street frontage. A maximum of two two-lane driveways shall be permitted on sites with 200 feet or more of primary street frontage.

At least one driveway shall be located on a secondary street or alley, where available.

Driveways and associated curb-cuts shall have a maximum width of 24 feet.

The minimum distance between driveways on the same lot shall be 50 feet.

Controlled entrances to parking (e.g. gates) shall be located at least 20 feet from the property line to allow for a queueing vehicle.



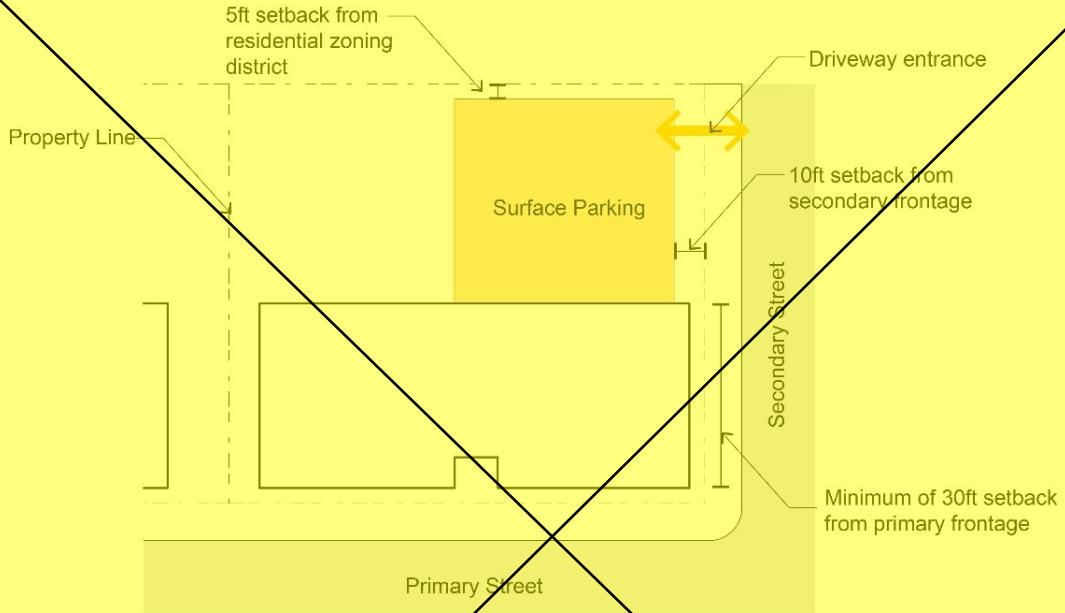
Surface Parking

Setbacks: Parking shall be set back a minimum of 30 feet from the primary frontage, 10 feet from any secondary frontage, and 5 feet from any adjacent Residential zoning district.

Parking shall be buffered by permitted non-parking uses or a landscaped setback adjacent to the property line, except for vehicle/pedestrian access.

Landscaped setbacks shall include hedges or shrubs with a minimum height of 3 feet at the time of planting that form a continuous visual screen to block vehicle headlights.

DRAFT



Structured Parking

Setbacks: Structured parking (including underground) shall be set back a minimum of 5 feet from any adjacent Residential zoning district.

Above ground parking shall be buffered by permitted non-parking uses with a minimum depth of 35 feet adjacent to the street property line, except for vehicle/pedestrian access.

Semi-subterranean parking shall not extend beyond the building façade, and may not project higher than four feet above sidewalk elevation.

Parking areas with controlled entrances, including access gates, shall accommodate at minimum the length of one vehicle without queuing into the public right-of-way.

ATTACHMENT 2

Table 2-6 of the draft Zone Text Amendment

City of South Pasadena

Chapter 36 Zoning

Focused Amendments to Various Sections

SHOULD BE CASE BY CASE OR STRIKEN

WHY SPECIFY THIS. SHOULD SHOW A RANGE, CAN BE 600 SF

TABLE 2-6. MIXED USE OVERLAY DISTRICT DEVELOPMENT STANDARDS

<u>Development Feature</u>	<u>Requirement</u>	<u>Notes</u>
<u>DEVELOPMENT INTENSITY</u>		
<u>Minimum Size or Area</u>	<u>20,000 sf</u>	
<u>Minimum Lot Frontage</u>	<u>80 ft</u>	
<u>Density Range for Residential</u>	<u>52 to 70 du/ac</u>	
<u>Maximum Lot Coverage</u>	<u>70%</u>	
<u>Minimum Residential Unit Size</u>	<u>Studio – 450 sf</u> <u>One-bedroom – 750 sf</u> <u>Two-bedroom – 900 sf</u>	
<u>NON-RESIDENTIAL USES</u>		
<u>Location</u>	<u>Non-residential uses are required along the street frontage in the areas described in the General Plan for development within a Corridor, District, or Neighborhood Centers.</u>	<u>Residential units shall be located above the ground-floor level within the BP zoning district.</u>
<u>BUILDING HEIGHT AND FORM</u>		
<u>Maximum Height</u>	<u>45 ft</u>	<u>Non-habitable building features such as chimneys, cupolas, flagpoles, monuments, steeples, roof screens, equipment, and similar structures covering no more than 10% of the top floor roof area may exceed the maximum height by up to 8 ft.</u>
<u>Maximum Stories</u>	<u>4</u>	
<u>Maximum Floor Area by Story</u>	<u>Up through Second Story – 100%</u> <u>Third Story – 90%</u> <u>Fourth Story – 80%</u>	<u>The standard refers to the percentage relative to the ground-floor building footprint area</u>
<u>Maximum Building Length</u>	<u>150 ft</u>	
<u>BUILDING RELATIONSHIP TO STREET</u>		
<u>Minimum Building Frontage</u>	<u>60%</u>	
<u>Maximum Elevation of Building Entry Above the Street/Sidewalk Level and</u>	<u>2 ft</u>	

SHOULD HAVE AN ASTERIK AND NOTE SAYING STATE ORDINANCES CAN ALLOW MUCH HIGHER IIN SOME LOCATIONS

SAME WITH THIS

CASE BY CASE

CASE BY CASE

NOT RELEVANT

TABLE 2-6. MIXED USE OVERLAY DISTRICT DEVELOPMENT STANDARDS

<u>Development Feature</u>	<u>Requirement</u>	<u>Notes</u>
<u>Maximum Recess Below the Street/Sidewalk Level</u>		
<u>Minimum Ground Floor Height</u>	12 ft	
<u>NON-RESIDENTIAL USE GROUND FLOOR BUILDING DESIGN</u>		
<u>Maximum Blank Wall Length</u>	25 ft	
<u>Minimum Glazing</u>	50%	
<u>Minimum Tenant Space Width</u>	25 ft	
<u>Minimum Number of Entries</u>	1 per 100 lineal ft	
<u>Minimum Wall Plane Articulation</u>	<u>To/From Window/Door – minimum 6 inches</u> <u>To/From Column/Other Feature – minimum 18 inches</u>	<u>Windows, door, columns, and other features shall be recessed or project forward to provide the respective minimum differential from the wall plane</u>
<u>Signs</u>	<u>As required by Division 36.320 (Signs)</u>	OMIT "TO 15 FT"
<u>SETBACKS FOR NON-RESIDENTIAL</u>		
<u>Front – Ground Floor</u>	<u>Per the underlying zoning district</u>	<u>May be increased to 15 ft where outdoor uses or small plazas are provided directly in front of the non-residential use</u>
<u>Side – Ground Floor</u>	<u>Per the underlying zoning district</u>	
<u>Rear</u>	<u>Per the underlying zoning district</u>	
<u>SETBACKS FOR RESIDENTIAL</u>		
<u>Front – Ground Floor</u>	20 ft minimum	
<u>Side</u>	10 ft minimum for first two floors 15 ft minimum from property line for third floor and above	For any property adjacent to an RE or RS district, the minimum setback for the first and second stories shall be 20 feet, and any story above the second story shall be set back a minimum distance of 25 feet from the property line.
<u>Rear</u>	20 ft minimum for first two floors 25 ft minimum for third floor and above	For any property adjacent to an RE or RS district, the minimum setback for the first and second stories shall be 30 feet, and any story above the second story shall be set back a minimum

OMIT "TO 15 FT"

PER ZONING

CASE BY CASE, LET DESIGN MAKE ITS CASE

15 FT IS A STANDARD REAR YARD SETBACK.

THERE ARE BETTER WAYS TO PROTECT RESIDENTIAL NEIGHBORHOOD CHARACTER. E.G., ENCROACHMENT PLANE

TABLE 2-6. MIXED USE OVERLAY DISTRICT DEVELOPMENT STANDARDS

<u>Development Feature</u>	<u>Requirement</u>	<u>Notes</u>
		<u>distance of 35 feet from the property line.</u>
<u>SETBACKS – GENERAL</u>		
<u>Setback from Access Driveway</u>	<u>5 ft minimum</u>	
<u>Distance Between Buildings</u>	<u>As required by the Fire Code, but no instance less than 10 ft</u>	
<u>PARKING, LOCATION AND DESIGN</u>		
<u>Site Access/Driveway Location</u>	<u>The location of site access/driveways shall be prioritized as follows: (1) From an alleyway, (2) From a side street, or (3) If the previous two locations are infeasible as determined by the Director, then access from the front shall be limited to a maximum 24-footwide driveway.</u>	
<u>Location of Parking Spaces/Areas</u>	<u>The location of parking spaces/areas shall be limited as follows: (1) Located to the rear of the building or underground, and (2) Shall not be located within the front or side street setback areas.</u>	
<u>Number of Spaces for Non-Residential Uses</u>	<u>As required by Division 36.310 (Parking and Loading)</u>	<u>Shared parking or a reduction in parking subject to approval of a parking study – Section 36.310.060. Within one-half mile of a high-quality transit station, no parking minimums shall apply for any use except for hotels, motels, bed and breakfast inns, and similar transient lodging facilities per Government Code Section 65863.2.</u>
<div style="border: 1px solid red; padding: 5px; width: fit-content;"> <p style="color: red; font-weight: bold; margin: 0;">LET THE MARKET DETERMINE THE PARKING RATIO WITHIN THE 1/2 MILE OF TRANSIT STATION. STRIKE GUEST PARKING</p> </div>		
<u>Number of Spaces for Residential Uses</u>	<u>Studio – 0.50 space One-bedroom – 1 space Two-bedroom – 2 spaces Guest Space – 0.25 per unit</u>	<u>Guest spaces are not required if non-residential spaces are available during non-operational hours.</u>

TABLE 2-6. MIXED USE OVERLAY DISTRICT DEVELOPMENT STANDARDS

<u>Development Feature</u>	<u>Requirement</u>	<u>Notes</u>
		<u>Parking is reduced, not required, for qualifying development projects within one-half mile of a high-quality transit station, as defined in Government Code Section 65863.2.</u>
<u>Design of Surface or Structure Parking</u>	<u>As required by Division 36.310 (Parking and Loading)</u>	<u>Unless modified by standards herein</u>
<u>LANDSCAPING AND OPEN SPACE</u>		
<u>Minimum Site Landscaping</u>	<u>20 %</u>	<u>Exclusive of areas on the site providing useable open space for residential uses.</u> <u>Improved rooftop areas can be counted toward open space.</u>
<u>Minimum Driveway and Parking Area Side Landscaping</u>	<u>5 ft</u>	
<u>Minimum Total Combined Useable Open Space per Residential Unit (Common and Private Combined)</u>	<u>300 sf/du</u>	<u>Improved rooftop open space, balconies, and indoor common spaces can be counted toward usable open space.</u>
<u>Common Open Space Requirements</u>	<u>1,000 sf area minimum</u> <u>25 ft minimum depth and width</u>	
<u>Private Open Space Requirements</u>	<u>No private open space is required for individual units.</u>	<u>If individual balconies, ground floor patios, porches, or similar private open space are provided for a residential unit, such area shall have minimum dimensions of 6 ft width and 4 ft depth.</u>

DOES NOT APPLY TO MIXED USE, STRUCTURED PKNG

DOES NOT MAKE SENSE FOR SMALL PROJECTS, ONLY WORKS FOR LARGE MULTIFAMILY PROJECTS. 25 FT MIN WIDTH IS UNACCEPTABLE

From:
Sent: Wednesday, September 20, 2023 11:36 AM
To: PlanningComments
Subject: 181 Monterey / Concern about Hillside overlay for RM and RH zone

CAUTION: This email originated from outside of the City of South Pasadena. Do not click links or open attachments unless you recognize the sender and know the content is safe.

City planning commission,

This is Victor Tang, the developer for 181 Monterey Rd, 1.25ac vacant property. This site is Housing Elements inventory Site 3 and it is the only housing site ready for development. We are interested in bringing affordable housing to the community. Due to higher construction cost and loan cost, a project can only be financially feasible with higher density and higher height. Our requests for higher density have been repeatedly rejected by Alison Becker. On 8/23 planning commission meeting, she said hillside properties didn't warrant higher density than 30du/ac. For your record, some hillside properties across the street such as 80 Monterey Road are zoned for 45du/ac.

I was recently informed that in addition to lower density at 30du/ac, our site is also subject to Hillside overlay, which has a maximum height of 28ft. 28ft is just enough for two story buildings and it is impossible to develop 30 units per acre with two stories. Our site is a Housing Elements inventory site and state law requires cities to "demonstrate that the zoning allows a specific density", which is 30du/ac for our site.

*The statute allows jurisdictions to use higher density as a proxy for lower income affordability, as long as certain statutory requirements are met. Parcels must be zoned to allow sufficient density to accommodate the economies of scale needed to produce affordable housing. To make this determination, the statute allows the jurisdiction to either **demonstrate that the zoning allows a specific density set forth in the statute (default density) or to provide an analysis demonstrating the appropriateness of the zoned densities of the site identified to accommodate the lower RHNA.***

Step 2A: Does the parcel's zoning allow for "at least" the following densities?

- For an incorporated city within a nonmetropolitan county and for a nonmetropolitan county that has a micropolitan area: sites allowing at least 15 units per acre.*
- For an unincorporated area in a nonmetropolitan county not included in the first bullet: sites allowing at least 10 units per acre.*
- For a suburban jurisdiction: sites allowing at least 20 units per acre.*
- For a jurisdiction in a metropolitan county: sites allowing at least 30 units per acre.*

I hope the planning commission can remove hillside overlay over RM and possibly all multifamily zones. As a reference, City of Los Angeles has a similar Hillside Ordinance. But it applies only to single family sites.

Regards,

Victor Tang