

4 2023 HOUSING ELEMENT: HOUSING CONSTRAINTS



Government policies and regulations impact the price and availability of housing and the provision of affordable housing. Constraints include residential development standards, fees, and permitting procedures. Providing infrastructure and services also increases the cost of producing housing. Not every constraint to housing production is governmental. Other constraints include the housing market and other non-governmental limitations. This chapter addresses governmental and non-governmental constraints as they relate to housing.

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Non-Governmental Constraints

The availability and cost of housing is strongly influenced by market factors over which local government has little or no control. State law requires that the housing element contain a general assessment of these constraints, which can serve as the basis for actions that local governments might take to offset their effects. The primary non-governmental constraints to the development of new housing are land costs, construction costs, and environmental constraints.

Development Costs

Price of Land

Land costs include acquisition and the cost of holding land throughout the development process. These costs can account for as much as half of the final sales prices of new homes in small developments or in areas where land is scarce. Land costs in single-family residential neighborhoods of San Carlos range from

\$340,000 to \$5.9 million per acre.¹ The diminishing supply of land available for residential construction, combined with increasing demand for such development, has served to keep the cost of land high and rising across the Bay Area. Among the variables affecting the cost of land are the size of lots, location and amenities, the availability and proximity of public services, its development potential, and the financing arrangement between the buyer and seller.

On behalf of 21 Elements, Century Urban² conducted an independent countywide study of single-family land sales and multi-family land sales in the last three years, inclusive of both rental apartment and for-sale (condos/townhomes) units. For single-family land sales countywide, of parcels up to one acre in size, the land cost ranged between \$582,000 to \$8 million, with an average of \$1,030,000 per unit. For multi-family land sales in San Mateo County, Century Urban's report shows the average land cost is \$1,000,000 for small multi-family and \$10,000,000 for large multi-family properties, respectively, with an ultimate land cost of approximately \$100,000 per unit for both small and large developments. In San Carlos, the study included four data points

ranging from a land cost of \$33,000 per unit to \$333,000 per unit, with an average land cost of \$222,000 per unit.

Cost of Construction

Construction cost is determined by the combined cost of labor and materials—these are the most significant cost components of developing residential units, and both of these costs have grown dramatically in recent years. According to data from the California Construction Cost Index, hard construction costs in California grew by 44 percent between 2014 and 2018, equivalent to an additional \$80 per square foot.³ Between 2020 and 2021 alone, construction costs increased 13.4 percent.

Construction costs are estimated to account for upwards of 60 percent of the production cost of a new home, especially for multi-unit residential buildings, which can require the use of more expensive materials, like steel, and need additional amenities such as parking structures.⁴ Variations in the quality of materials, type of amenities, labor costs, and the quality of building materials could result in higher or lower construction costs for a new home. Pre-fabricated factory built housing, with variation on the quality of materials and amenities, may also

1 A review of vacant residential land sales on Zillow.com on 8-20-2020 provided two vacant lots for sale within the City. Land costs were estimated from this sample and may not be representative of general land costs in the City.

2 Century Urban's San Mateo and Santa Clara Counties Development Costs & San Mateo County Unit Mix Research, April 2022, <http://www.21elements.com/constraints>

3 Hayley Raetz, Teddy Forscher, Elizabeth Kneebone and Carolina Reid, The Hard Costs of Construction: Recent Trends in Labor and Materials Costs for Apartment Buildings in California, The Turner Center for Housing Innovation, University of California Berkeley, March 2020, p.8, http://turnercenter.berkeley.edu/uploads/Hard_Construction_Costs_March_2020.pdf

4 Ibid., Raetz et al, p.4.

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affect the final construction cost (per square foot) of a housing project.

The relative importance of labor versus materials is a function of the complexity of the construction job and the desired quality of the finished product. The price paid for material and labor at any one time will reflect short-term considerations of supply and demand. Future costs are difficult to predict given the cyclical fluctuations in demand and supply that in large part are created by fluctuations in the larger state and national economies. Such factors unilaterally impact construction in a region and therefore do not deter housing construction in any specific community more so than another.

An indicator of construction costs is Building Valuation Data compiled by the International Code Council (ICC). The unit costs compiled by the ICC include structural, electrical, plumbing, and mechanical work, in addition to interior finish and normal site preparation. The data is national with the regional difference for California running generally 20 percent higher based on the most recent (2020) analysis cited from the Turner Center for Housing.⁵ The construction index does not include the price of the land upon which the buildings are built. The August 2021 national averages for costs per square foot of apartment units and single-family homes are as follows:

- Type I or II, Multi-Family (Steel/Concrete): \$79 to \$203 per sq. ft.
- Type V (Wood Frame), Multi-Family: \$137 to \$142 per sq. ft.
- Type V (Wood Frame), One- and Two-Family Dwelling: \$148 to \$158 per sq. ft.

The City's ability to mitigate high construction costs is limited without direct subsidies. Another factor related to construction cost is development density. With an increase in the number of units built in a project, overall costs generally decrease as builders can benefit from economies of scale. Throughout California, builders have remarked on high construction costs in 2021 and 2022, which are driven both by labor and materials costs.

Availability of Financing

The availability of capital to finance new residential development is a significant factor that can impact both the cost and supply of housing. Two types of capital are involved in the housing market: 1) capital used by developers for initial site preparation and construction and 2) capital for financing the purchase of units by homeowners and investors. Interest rates substantially impact home construction, purchase, and improvement costs. A fluctuation in rates of just a few percentage points can make a dramatic difference in the annual income needed to qualify for a

⁵ <https://turnercenter.berkeley.edu/research-and-policy/the-cost-of-building-housing-series/>

loan. In general, financing for new residential development is available at reasonable rates. However, economic fluctuations due to COVID-19 have caused caution among lenders and may have lasting effects through this Housing Element planning period. And while interest rates are low, lenders are considering applicants much more closely than in the past, leading to credit tightening despite affordable interest rates.

Competition for affordable housing funding also affects overall housing production. Affordable housing often relies on multiple sources of funding to complete projects. The Turner Center conducted a study on the cost to build low-income housing found that each additional funding source increases the cost to build. Some properties use six or more funding sources to complete a project, each of which is becoming increasingly competitive and difficult to secure.⁶ Low Income Housing Tax Credits (LIHTC) represent the primary funding source for new affordable housing. Historically the 9% tax credit (which is designed to subsidize 70 percent of the project cost) has been extremely competitive. Affordable housing developers are indicating that 4% tax credits (designed to subsidize 30 percent of the project) are becoming increasingly competitive, resulting in a longer project timeline (up to two additional years, as they must apply multiple times before they are able to secure tax credits).

⁶ U.C. Berkeley, The Turner Center for Housing Innovation. The Costs of Affordable Housing Production: Insights from California’s 9% Low-Income Housing Tax Credit Program. March 30, 2020.

Government Code 65583(a)(6) Development Analysis.

Government Code section 65583(a)(6) requires an analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including requests to develop housing at densities below those allowed and the length of time between receiving approval for housing development and submittal of an application for building permit.

Requests for Lower Development Densities

San Carlos has an active housing market, with development occurring at a range of densities. For mid-sized projects where the maximum allowed densities would result in between seven units to approximately 12 units, most developers have in recent years opted to stay below seven units, providing six units instead thereby avoiding the City’s requirement that all residential developments of seven or more units set aside 15 percent of the units as below market rate housing. An estimated 90 percent of these mid-size projects over recent years were proposed at less than the maximum densities, generally to avoid triggering the requirements of the BMR Ordinance. In some instances, developers also indicated that parking minimums resulted in a reduction in density below the allowed maximum densities because surface parking space was limited, and it was too expensive to construct podium or underground parking. To address this constraint, the City has initiated a Zoning Ordinance

<https://turnercenter.berkeley.edu/research-and-policy/development-costs-lihtc-9-percent-california/>

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amendment (Action HOU-4.2), to remove the requirement for guest parking in all RM and Mixed-Use zones. In addition, with the passing of AB 2097, parking requirements will be removed for a significant component of the San Carlos community. Pursuant to AB 2097, no parking is required within a half mile of public transit in all zoning districts. Given the proximity to transit for all of Downtown and the mixed use zones, this can be seen as a significant removal of this constraint. Action HOU-4.2 includes an update to the Zoning Ordinance to make these new regulations clear and indicate that no parking is required within a half mile of high frequency public transit.

Larger projects with a maximum allowable density that would yield 15 units or more generally maximize the allowable density and use the City’s Density Bonus Ordinance or the State Density Bonus Ordinance options, providing additional affordable units consistent with these Ordinances and the City’s BMR Ordinance.

In 2022, the City updated the BMR Ordinance to lower the threshold for constructing affordable units from a minimum of seven units to a minimum of five units for all ownership projects; the threshold for rental projects remains at seven units. In addition, through the City’s efforts to support more housing in the community, Action HOU-4.2 implements Zoning Ordinance revisions which will include not only an increase in density for higher density residential neighborhoods and mixed-use areas, but also will institute a new minimum density requirement (approximately 75 percent of maximum density) to ensure anticipated housing densities are achieved. The minimum

density requirement is triggered for new development projects only, not for minor additions or improvements.

Building Permit Timeframe

In San Carlos, the turnaround time between receiving entitlement approvals for a housing development and submittal of an application for building permit varies widely. Some applicants have plans complete in advance and submit the next day, while others take a few months. The majority of larger projects apply within two to three months after receiving entitlement approval.

A multi-family residential project with complex grading and drainage plans may take longer than usual to submit permits. Also, developers may struggle with feasibility analyses, financing, or negotiations with design professionals which are outside the control of the City.

Local Efforts to Remove Nongovernmental Constraints

Government Code 65583(a)(6) also requires a review of local efforts to remove nongovernmental constraints that create a gap in the jurisdiction’s ability to meet the RHNA by income category. The primary non-governmental constraint is the overall cost of affordable housing development (associated with both high land and development costs) in most parts of California. In general, constructing 100% affordable housing, especially for low and very-low income households, is not profitable to housing developers. Therefore, deed-restricted affordable units require subsidies beyond available density or financial incentives. This

places the construction burden on non-profits and similar grant or tax-credit funded housing developers and may result in affordable projects that are not always dispersed throughout the region but are concentrated in limited areas with lower development costs. While the City can offer developer incentives such as expedited permit processing or fee deferrals, local funding sources do not exist to fully mitigate the high cost of development for affordable housing developments.

The City has two Housing Funds that can support affordable housing: the Housing Asset Fund (Housing Successor) and the Housing In-Lieu Fund. The Housing Asset Funds has an approximate cash balance of \$3 million in June 2022, which is fully encumbered to support future housing projects. The Housing In-Lieu Fund has an approximate cash balance of \$12.4 million in June 2022, of which \$3.6 million is encumbered. The main sources of this funding are commercial linkage fees and to a lesser extent Below Market Rate (BMR) in-lieu fees. These funds help support gap financing for affordable housing projects; however, the City's ability to support projects is limited by available funds. For example, the Walnut Studios (817 Walnut) 100% affordable project was made possible by a sizeable investment of \$7.3 Million from the City of San Carlos, and a generous partnership with Charities Housing, the local nonprofit organization that developed the property and will continue to manage the 23-unit building. The City of San Carlos will continue to facilitate housing development by providing funding from both Housing Funds to support additional affordable housing (Action HOU-3.1).

Governmental Constraints

Although local governments have little influence on market factors such as interest rates and availability of funding for development, local governmental policies and regulations can affect both the amount of residential development that occurs and the affordability of housing. Since governmental actions can constrain development and affordability of housing, State law requires the Housing Element to “address and, where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing.”

Governmental constraints are policies, development regulations, standards, requirements, or other actions imposed by various levels of government upon land and housing ownership and development. Land use controls, building codes, processing procedures, and development fees are all factors that may hamper the maintenance, improvement, and/or development of housing. State and federal regulations such as those related to environmental protection, building codes, and other topics can also have significant and often adverse impacts on housing costs and availability. While constraints exist at all levels of government, this section emphasizes policies and regulations that can be mitigated by the City.

Land Use Controls

The City's primary policies and regulations that affect residential development and housing affordability include the Envision 2030 General Plan (adopted 2009), Title 18 Zoning, and Title 17

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Subdivisions. Table 4.4-1 summarizes the General Plan land use designations and the zoning districts that allow residential development as a permitted use or a conditionally permitted use, as of 2022.

Table 4.4-1: Residential General Plan Land Use Designations and Zoning Districts

General Plan Land Use Designations	Density (units/acre)	Corresponding Zoning Districts
Single-Family	3	RS-3
Single-Family	6	RS-6
Multiple-Family, Low Density	20	RM-20
Multiple-Family, Medium Density	59	RM-59
Mixed Use, Medium Density	50	MU-DC Mixed-Use Downtown Core
Mixed Use, Medium Density	50	MU-D Mixed-Use Downtown
Mixed Use, Medium Density	50	MU-SA Mixed-Use Station Area
Mixed Use, Medium High Density	59	MU-SC Mixed-Use San Carlos Avenue
Neighborhood Retail/Mixed Use, Medium Density	50	MU-NB Mixed-Use North Boulevard
Mixed Use, Medium Density	50	MU-SB Mixed-Use South Boulevard
Mixed Use, Low Density	20	MU-N Neighborhood Mixed Use

Sources: San Carlos Envision 2030 General Plan; Title 18 Zoning Ordinance.

Proposed General Plan and Zoning District Changes

In conjunction with the process of updating the Housing Element, the City proposes to increase allowed densities and heights to facilitate housing development in residential and mixed use areas. Table 4.4-2 summarizes the proposed General Plan designations and corresponding zoning districts. As indicated in Action HOU-4.2, these new and revised zoning districts and General Plan designations are scheduled for adoption in January 2023.

Density Bonus

Chapter 18.17 of the Zoning Ordinance provides a variety of affordable housing incentives. Section 18.17.030 provides City incentives for BMR units and Section 18.17.040 provides for density bonuses consistent with State Density Bonus law (Government Code Section 65915). Section 18.17.030 (City Density Bonus) was comprehensively updated in 2022 to provide additional incentives for rental projects to provide affordable housing, exceeding the bonuses provided by the State Density

Bonus law. Section 18.17.040 (State Density Bonus) was also updated in 2022 and is consistent with State law.

Table 4.4-2: Proposed General Plan and Zoning Districts

Residential and Mixed Use General Plan Designations	Zoning Districts
Single-Family, 3 du/ac	RS-3
Single-Family, 6 du/ac	RS-6
Multi-Family, Low Density (15-20 du/ac)	RM-20
Multi-Family, Medium Density (45-59 du/ac)	RM-59
Multi-Family, Medium High Density (75-100 du/ac)	RM-100
Mixed Use, Low Density (30-40 du/ac)	MU-N-40
Mixed Use, Medium Density (38-50 du/ac)	MU-N-50
Mixed Use, Medium High Density (75-100 du/ac)	MU-DC-100, MU-D-100, MU-SB-100
Mixed Use, High Density (90-120 du/ac)	MU-D-120, MU-SC-120, MU-NB-120, MU-SB-120, MU-N-120

Action HOU-3.6 is included in the Housing Plan to monitor state legislation as changes are made to the State Density Bonus law and update as needed. Action HOU-3.2 is also included to continue to monitor the effectiveness of the City’s BMR Ordinance, including incentives inherent in the Ordinance such as density bonuses and update as needed.

Zoning Ordinance

The San Carlos Zoning Ordinance implements the General Plan by establishing standards and regulations for all development in San Carlos. Table 4.4-3 summarizes the housing types permitted by zoning district. Each use is designated by a letter denoting whether the use is allowed (“P”), permitted with a conditional use permit (“C”), permitted with a minor use permit (“M”) or not allowed (“-”).

Table 4.4-3 Permitted Land Uses by Zoning District

Land Uses	RS-3	RS-6	RM-20	RM-59/100	MU-DC-100	MU-D-100/120	MU-NB-120	MU-SC-120	MU-MU-SB-100/120	MU-N-40/50/120
Single-unit Dwelling	P	P	-	-	-	-	-	-	-	-
Multi-unit Dwelling	-	-	P	P	P	P	P	P	P	P
Small Lot Single-Unit Development	-	C	P	C	-	-	-	-	-	-
Bungalow Court	-	C	P	C	-	-	-	-	-	-
Duplex	Pi	Pi	P	-	-	-	-	-	-	-
Townhouse Development	-	C	P	P	-	-	-	-	-	-
Accessory Dwelling Units	P	P	P	P	P	P	P	P	P	P
Emergency Shelter	-	-	-	-	-	-	P	-	P	-
Transitional/Supportive Housing	P	P	P	P	P	P	P	P	P	P
Single Room Occupancy	-	-	C	C	C	C	C	C	C	C
Residential Care Facilities										
General (+6 persons)	-	-	M	M	-	M	-	M	-	-
Limited (6 or less persons)	P	P	P	P	P	P	P	P	P	P
Senior (for residents 60+ years of age)	-	-	M	M	-	M	-	M	-	-

"P" Permitted Use
 "M" Minor Use Permit (Zoning Administrator)
 "C" Conditional Use Permit (Planning Commission)
 "-" Use is not permitted
 Note 1: Per SB 9
 Source: San Carlos Zoning Ordinance, 2021.

In addition to the residential and mixed use zoning districts, the Zoning Ordinance also has a Planned Development (PD) District,

which is an option developer's can choose that allows for deviation from development standards provided the

development is superior than what could be achieved under the zoning and that it be consistent with the General Plan and any applicable specific plan. Planned Developments require a development plan and standards to be reviewed by the Planning Commission and approved by the City Council.

Development Standards

Table 4.4-4 summarizes key development standards for the residential and mixed-use zoning districts. Development standards for housing can affect the ability of property owners to construct and modify housing. Residential development standards established in the Zoning Ordinance are designed to provide orderly development of the city and to protect and promote the health, safety, and welfare of local residents, as well as implement the policies of the General Plan.

Table 4.4-4: Residential Development Standards (2022)

Development Standard	RS-3	RS-6	RM-20	RM-59	MU-DC	MU-D	MU-SA	MU-SC	MU-NB/MU-SB	MU-N
Min. Lot Size (sq. ft.)	10,000	5,000	6,000	10,000	5,000	5,000	5,000	5,000	5,000	5,000
Min. Lot Width	75'	40'	60'	100'	50'	50'	50'	50'	50'	50'
Corner Lots	75'	60'	70'	100'	50'	50'	50'	50'	50'	50'
Density (units per acre)	3	6	20	59	50	50	50	59	50	20
Setbacks (feet)										
Front	20'	1 st Story: 15' 2 nd Story: 19'	15'	15'	Varies depending on street frontage (5'-15' min.) All-residential development in MU districts must conform to RM-59 front setback standards.					
Interior Side	1 st Story: 10' 2 nd Story: 14'	1 st Story: 5' 2 nd Story: 9'	First two stories: 5' 10'; thereafter		0' min; 10' min. abutting to RS district for all MU uses. All-residential development in MU districts must conform to RM-59 front setback standards.					
Street Side	1 st Story: 10' 2 nd Story: 14'	1 st Story: 7.5' 2 nd Story: 11.5'	10'	10'	All-residential development in MU districts must conform to RM-59 front setback standards.					

Table 4.4-4: Residential Development Standards (2022)

Development Standard	RS-3	RS-6	RM-20	RM-59	MU-DC	MU-D	MU-SA	MU-SC	MU-NB/MU-SB	MU-N
Rear	20'	15'	15'	15'	0 min; 30 min adjacent to RS district for all MU districts All-residential development in MU districts must conform to RM-59 front setback standards.					
Height Limit	28'	28'	35' Max. 3 stories	50' Max. 4 stories	Maximum: 50' 30' along East San Carlos Ave in MU-N District, 30' within 40' of an RS District 40' within 50' of and RS District					
Lot Coverage	25% (1) or 35%	50%	65%	75%	N/A	N/A	N/A	N/A	N/A	N/A
Maximum Floor Area Ratio	N/A	N/A	.75	2.0	2.5(2)	2.5(2)	2.5(2)	2.5(2)	2.5(2)	2.5(2)

Source: San Carlos Zoning Ordinance, 2022

Notes:

1. 25% within H Overlay District
2. Max. FAR could be increased by .1 through a conditional use permit under conditions outlined in Zoning Ordinance Section 18.05.030.A
3. Residential-only development in MU districts must conform to RM-59 district setback standards.

Zoning Ordinance Amendments (January 2023)

The City’s standards for minimum lot sizes, setbacks, lot coverage, and floor area ratio were not identified as constraints to housing development. However, while the City’s zoning regulations are not considered overly excessive and are on par with those being used by surrounding jurisdictions and to a great extent throughout San Mateo County, the City has identified significant changes that will further encourage housing and affordable housing development in the community in response to the City’s 2,735 RHNA requirement. In order to provide additional opportunities to meet the City’s regional housing

needs, the City initiated a comprehensive update to the Land Use Element and Zoning Ordinance in 2020 (culminating in 2023), instituting new zoning districts and allowing significant increases in density, as well as new required minimum densities. Table 4.4-5 summarizes the changes, including new zoning districts, maximum densities, minimum densities, and height limits. In addition, Appendix B provides examples of recent projects that demonstrate how the newly adopted development standards in the Zoning Ordinance do not present a potential or actual constraint towards achieving maximum densities.

Table 4.4-5: Proposed Changes to Zoning Densities and Heights (2023)

Zone		Maximum Density (du/ac)		Minimum Density (du/ac)		FAR		Building Height (feet)			Building Stories (stories)	
Existing	Proposed	Existing	Proposed	Existing	Proposed	Existing	Proposed	Existing	Proposed	Proposed	Existing	Proposed
MU-N	MU-N-40	20	40	n/a	30	2.0	2.5	50; 30 along East San Carlos Avenue in MU-N District! 30 within 40 ft of an RS district 40 within 50 ft of an RS district	50		4	4 ⁽¹⁾
MU-N	MU-N-50	20	50	n/a	38	2.0	2.5		50		4	4
MU-N	MU-N-120	20	120	n/a	90	2.0	3.0		75	35 along East San Carlos Avenue in MU-N District	4	6
MU-DC	MU-DC-100	50	100	n/a	75	2.5	2.5		50		4	4
MU-D	MU-D-100	50	100	n/a	75	2.5	3.0		60		4	5
MU-D	MU-D-120	50	120	n/a	90	2.5	3.0		75		4	6
MU-SC	MU-SC-120	59	120	n/a	90	3.0	3.0		75		4	6
MU-NB	MU-NB-120	50	120	n/a	90	2.5	3.0		75	35 within 40 ft of an RS district	4	6
MU-SB	MU-SB-100	50	100	n/a	75	2.5	3.0		60		4	5
MU-SB	MU-SB-120	50	120	n/a	90	2.5	3.0	75	40 within 50 ft of an RS district	4	6	
RM-20	RM-20	20	20	n/a	15	0.75	0.75	35	35		3	3
RM-59	RM-59	59	59	n/a	45	2.0	2.0	50	50		4	4
--	RM-100	n/a	100	n/a	75	N/A	3.0	n/a	60		n/a	5

(1) Height is limited to 3 stories along E. San Carlos Ave. in the MU-N-40 district

Another important change to the Zoning Ordinance is to remove the private open space and guest parking requirements for all multi-family uses in residential and mixed-use zones. Eliminating this requirement, along with significant increases in height and density are anticipated to provide a significant

incentive for housing development in San Carlos, where existing land prices are high and vacant land is rare. Action HOU-4.2 in the Housing Plan summarizes the Zoning Ordinance changes and timeline that the City proposes to address the housing crisis.

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Heights

In San Carlos, the maximum building height ranges from 28 feet in low density residential zones to 50 feet with a maximum of three to four stories in high density residential zoning districts. In mixed-use zoning districts, height limits are 50 feet. To provide for appropriate transitions between zones, heights are limited to 30 feet for any portion of a building within 40 feet of an RS zoned property and 40 feet within 50 feet of an RS zoned property. Maximum stories in mixed-use zones are four stories. To achieve neighborhood compatibility in an objective way, these transition standards are important. Where the height limit includes a number of stories as well as a height limit in feet, both standards must be achieved.

As part of the proposed Zoning Ordinance amendments scheduled for adoption in January 2023, the City has increased heights limits to further promote the production of higher density housing in conjunction with an increase in density. Heights are proposed to increase from 50 feet to 75 feet in most zones, as shown in Table 4.4-5. Transition standards between higher density areas and the RS zone remain in place.

The new heights are intended to allow residential development in these new zones to achieve close to or exceed the maximum permitted densities. Height limits in RM-20 (35 feet) and RM-59 (50 feet) zones are not proposed to be amended, as these standards are fairly typical in zones with these types of densities (20 du/ac in RM-20 and 59 du/ac in RM-59), as seen in various cities across the Bay Area. In general, the RM-20 zoning district,

with a maximum density of 20 units to the acre, facilitates the development of three-story townhomes and other three-story apartment style homes. This type of development can be achieved within a 35-foot height limit, and no constraint is identified. The areas zoned RM-20 are fully developed and as such, no recent development has occurred in this zoning district. However, recent development trends in other zoning districts show that three-story housing is feasible and attainable within this height limit. For example, 1052 Laurel Street is a three-story six-unit townhome-style building. The first and second floors are 10 feet in height and the third floor is nine feet in height for a total building height of 33 feet and four inches. This project exceeded the maximum allowed density (with a density bonus) within the 35-foot height limit. See Appendix B for clarification on how San Carlos measures floor to ceiling and interstitial space per story.

Furthermore, while the maximum height limit is listed as a specific limit in feet, the City's Zoning Ordinance also allows for flexibility through allowed projections beyond maximum permitted building heights, provided that no portion of a structure more than the building height limit contains habitable areas or advertising. For example, multifamily and nonresidential buildings elevator and stair towers are allowed a 16-foot maximum vertical projection above the height limit. Architectural features such as spires, towers, cupolas, etc. are allowed to exceed height limits by 10 feet. Additionally, in all mixed-use zoning districts except parcels along East San Carlos Avenue, a parapet wall, cornice, or sloping roof may project up to four feet above the height limit. Based on these trends and

height exceptions, the 35-foot limit within limited areas of the city is not a constraint to the development of housing. Furthermore, Housing Action HOU-4.5 will ensure that the City continues to evaluate potential constraints to housing development, with biennial reviews of development standards to remove any identified constraints to achieving maximum densities.

For the new RM-100 zoning district proposed, building height is increased to 60 feet. Heights in mixed-use districts were also increased, up to 75 feet in MU-D-120, MU-SC-120, MU-SC-120 and MU-SB-120. These heights are intended to facilitate the increased densities. Appendix B includes an analysis of updated development standards and how they apply to recent development projects.

Lot Coverage

Maximum lot coverage standards vary from 25 to 50 percent in low density residential zones to 65 to 75 percent in higher density residential zones. Mixed use zones have no maximum lot coverage standard. These standards are typical in many Bay Area cities and in San Carlos have not historically been considered restrictive to the production of housing. As an example, the City of Alameda included a program in its Housing Element to increase lot coverage from existing levels to 60 percent in higher density zones. San Carlos's existing lot coverage standards exceed these increased standards.

Density

The City's existing density maximums range from three dwelling units per acre to six dwelling units per acre for low density residential zones. Higher density residential zones have densities that range from 15 dwelling units per acre to 59 dwelling units per acre. In mixed use zones (as of 2022), densities range from 20 dwelling units per acre to 59 dwelling units per acre. As part of the Zoning Ordinance amendments scheduled for adoption in January 2023, the City will not only increase density for higher density residential neighborhoods and mixed-use areas, but also will institute a new minimum density requirement (approximately 75 percent of maximum density) to ensure anticipated housing densities are achieved. The new densities will have a maximum range of 40 to 120 dwelling units per acre and a minimum range of 30 to 90 dwelling units per acre. The City initiated these Zoning Ordinance amendments to achieve the necessary density to encourage housing production citywide and to meet its regional housing needs. The minimum density requirements are intended to preserve and protect multi-family zones for higher intensity housing by avoiding the development of single-family homes or large townhome project types in even the lowest-density multi-family zone. In higher income communities such as San Carlos, such provisions may limit housing variety in higher density zones (precluding single family development), but are crucial to preserve these areas for their intended use, which provides space for multi-family developments intended to increase citywide housing choice and meet the regional housing needs.

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While there is no zone identified that allows densities at a range of six to 15 dwelling units per acre, it is expected that housing at these densities can be met through accessory dwelling unit (ADU) and development that will be facilitated by SB 9. In San Carlos, the median size for a residential lot is 6,600 square feet. The addition of an ADU to an existing single-family residence on a median-sized lot results in a density of 13 dwelling units per acre, allowing individuals interested in developing housing at this range to do so. In addition, an analysis of ADU permits in San Carlos between 2021 and 2022 revealed that projects were resulting in densities between five and 18 dwelling units per acre, with a median density of 13 dwelling units per acre. Of the 67 ADU permits analyzed, lot sizes ranged from 4,597 to 19,354 square feet, with a median lot size of 6,737 square feet. These trends illustrate that existing development standards do not impede housing at a range of six to 15 dwelling units per acre as ADUs have been successfully encouraging housing types and enhancing housing mobility at this density range. Furthermore, the development trends show that the City’s development standards encourage this housing type in San Carlos, with increasing demand for ADU construction, as indicated in the Housing Resources section of this Housing Element.

Cumulative Impacts of Land Use Controls

As a part of the Housing Element update and proposed Zoning Amendment process, prototypical development sites were analyzed to identify development standards that would support the new maximum densities, including height, open space, parking, etc. without undue cost or impacts to housing supply or

housing choice. Higher density residential and mixed-use zones allow for significant variety in housing choice and type and the increased densities support additional affordability. The proposed Zoning Ordinance amendments (summarized in Action HOU-4.2) reflect that analysis and are intended to support development meeting allowed densities without constraints. In addition, Action HOU-4.4 is included in the Housing Plan to address approval certainty through objective design standards and streamlining of the approval process.

Since approval of the Zoning Ordinance amendments in January 2023, development interest has continued to increase and projects in the pipeline have been facilitated by the new allowed densities and development standards. For example, three sites identified as potential housing sites in the Housing Resources Chapter are progressing toward potential projects (See Appendix B for more information):

- 11 El Camino Real – CVS Pharmacy: A formal application has been submitted for this site, which will include 242 new units, including 24 very low-income and 12 low-income units.
- 1800 El Camino Real – Carl’s Jr.: The property owner of this site requested to be added to the Housing Element Sites inventory and requested to be upzoned. Subsequent to the rezoning, the property was listed for sale and the City is in the process of acquiring the property for affordable housing.
- 240-280 El Camino Real – Dunkin Donuts: While Dunkin Donuts just completed a significant façade improvement,

the property owner is currently in discussion with the City to redevelop the property, including potential acquisition of an adjacent property, for a housing development.

As of 2023, Housing Action HOU-4.3 is underway to update the Zoning Ordinance to implement objective design standards for housing throughout the city. As part of this process, the City will review the Zoning Ordinance to identify any additional revisions necessary to remove barriers to development and to ensure objectivity in the City’s development standards. Key standards to assess include the FAR standards for residential uses and requirements for upper story setbacks. Revisions to the Zoning

Ordinance will be implemented as part of the objective design standards process (Action HOU-4.4), which will be completed in 2024. In addition, throughout the planning period, the City will continue to evaluate development standards to promote achieving maximum densities, as indicated in Action HOU-4.5 in the Housing Plan.

Parking Requirements

City parking standards for residential development are based on the type of residential land use and vary based upon the zoning district. Table 4.4-6 summarizes residential parking standards for the residential and mixed-use zoning districts.

Table 4.4-6: Residential Parking Standards (2022)

Mixed-Use Districts	Required Spaces	Additional Regulations
Studio / 1-bedroom units	1 space per unit	One covered space per unit. One additional guest parking space per 4 units in developments greater than 10 units.
Two or more bedrooms	1.5 spaces per unit	
Residential Districts	Required Spaces	Additional Regulations
Single-Unit Residential	2 spaces per unit	RS-6 Districts require two covered parking, or one covered and one on 20 foot-wide driveway.
Accessory Dwelling Unit (ADU)	1 space per for each ADU (unless otherwise exempt per State ADU law)	
Affordable Housing Development (Moderate Income and Below [BMR])		
Studio	.75 spaces per unit	One additional guest parking space per 4 units in developments greater than 10 units. Number of total covered spaces shall equal number of units. Reductions pursuant to Affordable Housing Incentives granted to developments with at least 1 BMR unit
1- or 2-bedrooms	1 space per unit	
3+ bedrooms	2 spaces per unit	
Multi-Unit Residential		
Studio	1 space per unit	1 covered space for each unit; 1 guest parking per two units
1- or 2-bedrooms	1.5 spaces per unit	

Table 4.4-6: Residential Parking Standards (2022)

3+ bedrooms	2 spaces per unit
Elderly and Long-Term Care	2 spaces for the owner-manager plus 1 for every 5 beds and 1 for each nonresident employee
Group Residential	1 per bed plus 1 for every 10 beds
Residential Care, Limited	None in addition to base requirement
Residential Care, General and Senior	2 spaces for owner-manager plus 1 for every 5 beds and 1 for each nonresident use
Single Room Occupancy	0.5 spaces per unit
Emergency Shelter	1 per 200 sq. ft. of floor area

Note: 1. As part of the Housing Element update to reduce constraints on development, minimum guest parking requirements are proposed to be removed. 2. AB 2097, in effect January 1, 2023, prohibits the City from imposing any minimum parking requirement on any residential, commercial, or other development project, as defined, that is located within 1/2 mile of public transit, as defined.

Less parking is required in mixed-use zoning districts and for affordable housing developments. These parking standards are generally consistent with other jurisdictions throughout San Mateo County. In San Carlos, housing developers may instead pay an in-lieu fee to a parking exception fund for projects within an established parking assessment district. The City also allows for reduced parking, as outlined in Chapter 18.20.050 of the Zoning Ordinance (which can be used cumulatively as applicable). These reduction provisions include:

- **Transportation Demand Management:** The number of required parking spaces for any project subject to Chapter 18.25, Transportation Demand Management (i.e., multi-unit development with 10 or more units), shall be reduced by twenty percent of the normally required number of spaces.
- **Transit Accessibility:** For any land use except residential single-unit and duplex development, if any portion of the lot is located within one-quarter mile of a transit stop with regular, scheduled service during the weekday hours of seven a.m. to nine a.m. and five p.m. to seven p.m., the number of required parking spaces may be reduced by 20 percent of the normally required number of spaces. This parking reduction does not apply in the mixed-use or the industrial arts districts because parking requirements for these districts already reflect transit accessibility.
- **Motorcycle Parking:** Motorcycle parking may substitute for up to five percent of required automobile parking. Each motorcycle space must be at least four feet wide and seven feet deep.
- **Shared Parking:** Where a shared parking facility serving more than one use will be provided, the total number of

required parking spaces may be reduced by up to forty percent with Planning Commission approval of a conditional use permit, if the Commission finds that:

- The peak hours of use will not overlap or coincide to the degree that peak demand for parking spaces from all uses will be greater than the total supply of spaces;
 - The proposed shared parking provided will be adequate to serve each use;
 - A parking demand study prepared by an independent traffic engineering professional approved by the City supports the proposed reduction; and
 - In the case of a shared parking facility that serves more than one property, a parking agreement has been prepared consistent with the provisions of off-site parking facilities.
- Other Parking Reductions: Required parking for any use may be reduced through Planning Commission approval of a conditional use permit, accompanied by a parking study showing reduced parking needs.

Parking costs are often absorbed into the sale or rental price of residential and commercial uses, thereby hiding the true cost of parking and encouraging driving. By unbundling parking, property owners can charge residents and tenants separately for leasing a parking space. Unbundled parking saves money for households that do not wish to park a vehicle. Residents recognize the cost of parking and can determine if it is a worthwhile expense, as opposed to it being incorporated into the overall price of renting or buying a home regardless of whether

the resident owns a vehicle. San Carlos has adopted an ordinance that allows for residential projects with 10 or more units to unbundle parking with approval of a Minor Use Permit.

Proposed Parking Changes

While the parking requirements in San Carlos are typical of communities in San Mateo County, developers have indicated that minor modifications to existing standards would facilitate additional housing, including removing guest parking space requirements. As such, Action HOU-4.2 is included in the Housing Plan to remove this potential constraint and guest parking requirements for multi-family housing. In addition, Action HOU-4.2 will strengthen incentives for transit-oriented development by updating the Zoning Ordinance to reference/incorporate the minimum parking prohibitions associated with AB 2097, effective January 1, 2023, within 0.5 miles of high frequency public transit (as defined in AB 2097) in all zoning districts. In San Carlos, areas within 0.5 miles of high frequency public transit represent a significant portion of the City's multi-family development capacity. Public transportation services include local and regional routes provided by the San Mateo Transit District and CalTrain's commuter rail. The San Carlos Caltrain stop is located at the intersection of El Camino Real and San Carlos Avenue, and El Camino Real is served by bus routes with 15-minute headways. These public transit routes generally parallel the location of local mixed use zoning districts, which are, in turn, often adjacent to higher density multi-family zoning districts. All areas zoned mixed-use and RMF-100 are located within 0.5 mile of El Camino Real and 84 percent of the

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area zoned MF-59 is located within 0.5 mile of El Camino Real. As such, these areas have no parking requirements and parking is not considered a constraint to housing development.

Open Space Requirements

To enhance the living environment of multifamily residential and mixed-use neighborhoods, communities typically require housing developments to have a certain amount of open space, comprised of private areas such as patios, fenced yards, or balconies; and common or public outdoor spaces. In San Carlos, both of the multifamily zoning districts and all of the mixed-use

zoning districts are subject to a per square foot standard by unit for private open space, and a percentage of the overall development site for common open space. Once the amount of open space is calculated, San Carlos has minimum standards regulating dimensions, usability, and accessibility. These types of standards are fairly general in nature and similar to that required by surrounding communities. Additionally, San Carlos lists a reduction in the usable open space requirement as a type of concession and/or incentive to developments providing affordable housing. Table 4.4-7 identifies the different open space requirements for residential and mixed-use zones.

Table 4.4-7: Open Space Standards for Multifamily Residential and Mixed-Use (2022)

Open Space Type by District	RM-20	RM-59	MU-DC, MU-D	MU-SA, MU-SC, MU-NB, MU-SB, MU-N
Minimum Private Open Space (Sq Ft Per Unit)	150	100	100	150
Minimum Common Open Space (Percent of Site Area)	15		10 ¹	

Source: San Carlos Zoning Ordinance, 2021

Notes:

1. Applicable only to mixed-use and nonresidential development on lots > than 15,000 sq ft
2. As part of the Housing Element update to reduce constraints on development, minimum private open space requirements are proposed to be removed.

Proposed Open Space Changes

Overall, the requirements imposed by San Carlos for open space in multifamily residential and mixed-use neighborhoods are similar to surrounding communities. However, to further reduce constraints on housing development as densities are increased, the City is reducing open space requirements (Action HOU-4.2). Specifically, the City is proposing to eliminate the requirement

for private open space and instead require only the amount of open space that was previously required as common/public open space; this open space may be met through common open space, private open space, or a combination thereof. Open space may be provided at grade, at podium levels, via balconies, or on rooftops. In residential zones, the requirement for private open space in the RM-20 and RM-59 zoning districts will be removed, leaving only

the one open space requirement based on a percentage of the site, which may be met through common open space, private open space, or a combination thereof. The new RM-100 zone must provide 10 percent of the site area as open space (common, private, or a combination thereof).

On-/Off-Site Improvements

Due to the built-out character of San Carlos, the City typically requires only minimal on-and off-site improvements as a condition of approval for new residential development. Most new housing development occurs on existing lots that are already served by necessary infrastructure. The City of San Carlos requires that developers complete certain minimum site improvements in conjunction with new housing development. Required on-site improvements include grading and installation of water, sewer, storm drainage, storm drainage retention, gas, electricity and cable utilities. Required off-site improvements include curbs, gutters, sidewalks, sewer lateral, drainage structures, full street sections, and street lighting. The City also requires that developers install landscaping and irrigation systems when necessary.

Per the City of San Carlos subdivision ordinance, proposed new streets in subdivisions must meet the specific size standards articulated in the Subdivisions Ordinance. (Given the built-out nature of San Carlos, very few developments require construction of new streets.) The Ordinance allows for a minimum width of two lanes with sidewalks for a total width of 50 feet, to allow space for on street parking and adequate pedestrian

accommodations. Alleys may be 30 feet in width. Some developers have proposed privately maintained streets and alleys as narrow as 20 feet. For example, a project is currently proposed at 308-310 Phelps that would construct nine single family homes accessed via a 20-foot wide private road. At 2811 San Carlos Avenue, 11 new single-family homes were approved and constructed with a 25-foot wide private street. 808 Alameda de las Pulgas (not yet approved) is proposed with one 50-foot-wide public roadway central to the development and several private streets ranging from 21 feet to 30 feet in width to access 87 units. The City of San Carlos will consider such proposals provided that adequate access is provided for fire safety.

The on- and off-site improvement standards imposed by the City are typical for most communities and do not pose unusual constraints for housing development. The community is entirely built-out and as such, new development is not required to complete vast infrastructure improvements. Conditions of approval to complete on- and off-site improvements are provided to applicants in a timely manner and do not have a significant impact on project timing. While these improvements may increase the cost of production, adequate sewer, water, and street infrastructure is a necessary component of a healthy and productive city. These costs are not considered excessive and often represent a small fraction of a project's development costs. Developers have not indicated that on- or off-site improvements are a significant constraint. Based upon recent proposals submitted, approved, and constructed by the development community for a variety of housing sites throughout San Carlos,

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off-site improvements required for housing development are not considered a constraint on housing development.

Locally Adopted Ordinances

State law requires that cities include an analysis of any locally adopted ordinance that directly impacts the cost and supply of residential development, such as inclusionary housing ordinances and short-term rental ordinances. The only locally adopted ordinance that directly impacts the cost and supply of housing is the City of San Carlos Below Market Rate Housing Program. The City does not have a short-term rental ordinance, growth controls, crime free ordinances, or similar programs and regulations.

Below Market Rate (BMR) Housing Program

To encourage the development of affordable housing throughout the City, San Carlos adopted Chapter 18.16 “Affordable Housing Programs” and Chapter 18.17 “Affordable Housing Incentives” into the San Carlos Zoning Code. Chapter 18.16 is an “inclusionary housing” ordinance, which requires a specified share of new residential construction be affordable at below market rate (“BMR”) to households at lower- and moderate-income levels.

In 2021, the City Council directed an update to the BMR ordinance to actively encourage the creation of affordable housing at all income levels and to meet regional housing requirements. In 2022, the City adopted an update that supports affordable housing opportunities and is not a constraint to

housing development. In sum, this update (1) adjusted the City density bonus to provide an additional incentive for developers, (2) increased inclusionary housing requirements for ownership units, and (3) extended affordability periods in perpetuity (previously 45 years for ownership units and 55 units for rental units). With this recent update, the affordability requirement for ownership projects is triggered for projects of five units or more (instead of seven) and requires 20 percent of the units to be affordable at low income (70% AMI). For rental projects, to retain development feasibility no changes were proposed – projects of seven units or more are required to provide 15 percent of the units as BMR units (with 10% very low and 5% low), or projects can provide 15% very low income units (this alternative allows projects to achieve a greater density bonus through the State Density Bonus law).

These changes were comprehensively analyzed to ensure that they do not unduly constrain housing development. The City hired an economist to prepare financial pro formas reflecting the expected costs of new development, and compared those costs to the revenues that could be generated from the projects given various mixes of market-rate and affordable housing. These pro formas were then analyzed to find a scenario that resulted in more affordable units and/or units at deeper income levels, while not inhibiting a developer’s return on investment to the point that such projects would no longer be feasible. With regard to ownership projects, the analysis revealed that there is room to both increase the proportion of units required and lower the income level required, while retaining financial feasibility. These

changes further incentivize use of the State Density Bonus or the City's density bonus.

Regarding rental projects, it was discovered that developments are already facing feasibility challenges with the current requirement of 10% at very low income and 5% low income. Rental developments are generally considered feasible when they are projected to achieve greater than a 5% yield on cost. Under the City's current inclusionary requirements, a medium sized rental development is estimated to achieve a 4.9% yield on cost.

In an effort to determine the impact the City's inclusionary requirement is having on rental developments, EPS also ran a scenario under which no requirement existed and a developer was not required to build any affordable units. Under this scenario the estimated yield on cost increased to 5.2%, suggesting that the City's inclusionary requirement plays a smaller impact on project feasibility than broader market conditions such as land, labor, and construction costs.

As a result, the only change made to rental projects of the inclusionary ordinance is to add an additional option for developers to construct 15 percent of units at the very low-income level. A project that meets this alternative inclusionary standard would be entitled to a 50 percent density bonus under State law, whereas a project that meets the City's current inclusionary standard would only be entitled to a 32.5 percent bonus. The analysis as well as observed developer preferences demonstrate the significant value of density bonus units. Technically this

would already be allowed under the City's current requirements, but highlighting the 15 percent very low-income option will help draw attention to the maximum State Density Bonus of 50 percent that projects are entitled to pursue.

The above inclusionary requirements are made much more feasible by the existence of California's State Density Bonus. The State Density Bonus Law mandates that cities provide an increase in the maximum density allowed by local zoning regulations for developments that include certain amounts of affordable housing units. For example, under the inclusionary level for ownership units of 20 percent at low income, a project would be entitled to a 35 percent density bonus, greatly increasing the profitability of the project.

However, even with the State Density Bonus many rental developments in San Carlos face an upward battle in terms of feasibility. For this reason, the City adopted additional incentives through an improved City Density Bonus, specifically for rental developments. San Carlos previously implemented a City Density Bonus Program, which granted one additional market-rate unit for every unit at low income or lower that is included in a project. This City Density Bonus was generally less favorable than the State Bonus and as a result is rarely utilized. However, the City has elected to increase this City Density Bonus for rental units to help improve their feasibility and produce more affordable units.

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This amended City Density Bonus is a fixed bonus rate that exceeds the highest rates provided by the State, equivalent to 4:1 for each very low-income unit and 2:1 for each low income unit, and allowing all of the affordable base units to trigger bonus units rather than requiring the developer to select only one income level to apply. Under this program, a 100-unit rental project meeting the City’s current inclusionary ordinance would qualify for 50 bonus units as seen in Table 4.4-8 below:

Table 4.4-8: Example Density Bonus

100-Unit Rental Project	State Density Bonus	City Density Bonus
Base Units	100	100
BMR Units	10 Very Low Income 5 Low Income	10 Very Low Income 5 Low Income
Bonus Units	33	50
Total Units	133	150

Developers that utilize the City Density Bonus would still be able to use certain provisions of the State Density Bonus. As a result, some may choose to utilize the City Bonus to obtain additional units and the State Bonus for concessions on height, parking, or other areas.

In addition to the above changes, the City also decreased the threshold requiring that a BMR unit be built for ownership units from seven to five units. This aligns with the increased requirement that 20 percent of units be designated low income. This was an important change as well, since projects are not always achieving maximum densities by building below this required threshold. Lowering the threshold (in addition to the

City’s recent change to add minimum required densities) will address this issue. The threshold remains seven units for rental developments.

Building Codes and Enforcement

San Carlos implements the 2019 edition of the California Building Code, and 2019 edition of the California Green Building Standards Code. The City intends to adopt the 2022 California Building Code series (including the 2022 California Green Building Standards Code [CALGreen]) in 2022, which will become effective January 1, 2023.

These codes establish standards and require inspections at various stages of construction to ensure code compliance and minimum health and safety standards. Although these standards and the time required for inspections increase housing production costs and may impact the viability of rehabilitation of older properties, the codes are mandated for all jurisdictions in California and are necessary to ensure the safety of structures.

The City has adopted minor modifications to both the California Building Code and the California Green Buildings Standards Code. The California Building Code modifications include administrative and technical modifications that are related to fences and lattice, retaining walls, and construction methods for concrete structures. Modifications to the California Green Buildings Standards Code related to one- and two-family dwellings expand the code’s scope to include “Residential Reconstruction projects” in addition to new projects. Developers

have not indicated that these minor revisions constitute a constraint. Several affordable and market rate projects have been developed under the revised Building Code and have not been impacted by these revisions.

Enforcement of the adopted codes focuses primarily on review of new construction proposals to ensure that they comply with minimum health and safety standards. The City of San Carlos's Building Division and the San Carlos Fire Department provide inspection and review to ensure all development projects comply with Building Codes. Like many jurisdictions, San Carlos's resources to mount proactive code enforcement are limited.

The City achieves code compliance through complaint based measures. Residents may register suspected code violations to the Building Department for further investigation and inspection by phone, email, or through an online portal. The Building Department also maintains a shared agreement with the County of San Mateo to address these complaints. The City's proactive code compliance is provided through additional compliance checks that are administered by the City's Apartment Inspection Program to ensure proper maintenance and safety for occupants of residential units in San Carlos. As part of this program, building officials conduct inspections of residential rental buildings at least once every two years or whenever necessary to remedy ongoing Code violations. Typical items checked by the program include site conditions, electrical, plumbing, mechanical, water heaters, and housing code violations. If any violations are found during the inspection, the property owner

will work with building officials to correct any issues within 30 days of receipt of the correction notice. The enforcement of these codes does not add significantly to the cost of housing. These regulations help guard against the deterioration of residential properties, which helps protect the condition of existing housing stock and ongoing availability.

Zoning for a Variety of Housing Types

State housing element law requires that jurisdictions facilitate and encourage a range of housing types for all economic segments of the community. The following paragraphs describe how the City makes provisions for a variety of housing types.

Multifamily Rental Housing

Multi-family developments are permitted by-right in the Residential Multifamily (RM) and Mixed-Use (MU) zoning districts. Stand-alone multi-family residential developments located in mixed-use zoning districts are subject to RM-59 development standards for building setbacks and the maximum allowed density permitted by the MU zoning district. Mixed-use developments (the integration of residential and commercial uses on one site) are allowed by-right in all MU zoning districts. As part of the Zoning Ordinance amendments (Action HOU-4.2), stand-alone residential development will no longer require a Conditional Use Permit in some areas along El Camino Real and objective development standards (including modifications to required setbacks) will be crafted to allow developments to achieve maximum densities.

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Housing for Agricultural Employees (permanent and seasonal)

The Employee Housing Act (Government Code Section 17021.5 and 17021.6) requires that any employee housing occupied by six or fewer employees shall be considered a single-family structure within a residential land use and must be treated the same as a single-family dwelling of the same type in the same zoning district. In addition, employee housing consisting of no more than 36 beds in a group quarters, or 12 units or separate rooms or spaces designed for use by a single-family or household, must be considered an agricultural land use and be treated the same as any other agricultural activity in the same zoning district.

The urban nature of development in the Bay Area is incongruous to agricultural uses. No zoning districts in San Carlos allow for agricultural uses (beyond community gardens). The City complies with State Health and Safety Code Sections 17021.5, which concerns employee housing that serves six or fewer employees, which would include farmworkers.

Emergency Shelters

Government Code Section 65583 requires jurisdictions to permit emergency shelters without a Conditional Use Permit (CUP) or other discretionary permit in at least one zoning district with adequate capacity to serve the unsheltered population. Emergency shelters are allowed without discretionary review in the Mixed Use North Boulevard (MU-NB) and Mixed Use South Boulevard (MU-SB) zoning districts. There are 6.2 acres of land designated MU-NB and 17.4 acres of land designated MU-SB. These areas are located at the north and south gateways of the El

Camino Real (State Route 82) corridor in San Carlos. Both zoning districts allow for a variety of uses and are located in close proximity to local services and transit. This zoning district has a number of underutilized properties as well as a mix of medium-sized buildings that could transition to reuse as homeless shelters. Based on the size of the zoning districts identified, opportunities for adaptive reuse of existing buildings, and ready access to services and transportation, the zone has sufficient capacity to accommodate the City's homeless need in at least one year-round shelter. (In 2019, there were 30 homeless individuals in San Carlos, as reported by the San Mateo County One Day Homeless County and Survey.) San Carlos supports the distribution of emergency shelters and transitional housing in areas of the city where appropriate support services and facilities are available in close proximity.

The development and management standards for emergency shelters in the Zoning Ordinance (Section 18.23.110) were drafted to be consistent with State law. Specific provisions for emergency shelters in San Carlos specify:

- **Number of Residents.** The number of adult residents, not including staff, who may be housed on a lot that is smaller than one acre shall not exceed the number of persons that may be accommodated in any hospital, elderly and long-term care facility, residential, transient occupancy, or similar facility allowed in the same district.
- **Length of Occupancy.** Occupancy by an individual or family may not exceed one hundred eighty consecutive

days unless the management plan provides for longer residency by those enrolled and regularly participating in a training or rehabilitation program.

- **Outdoor Activities.** All functions associated with the shelter, except for children’s play areas, outdoor recreation areas, parking, and outdoor waiting must take place within the building proposed to house the shelter. Outdoor waiting for clients, if any, may not be in the public right-of-way, must be physically separated from the public right-of-way, and must be large enough to accommodate the expected number of clients.
- **Minimum Hours of Operation.** At least eight hours every day between seven a.m. and seven p.m.
- **Supervision.** On-site supervision must be provided at all times.
- **Toilets.** At least one toilet must be provided for every fifteen shelter beds.
- **Management Plan.** The operator of the shelter must submit a management plan for approval by the Director. The plan must address issues identified by the Director, including transportation, client supervision, security, client services, staffing, and good neighbor issues.

The standards listed above are common across many cities in California and do not constrain the production of emergency shelters. However, while State law does allow jurisdictions to regulate the number of beds provided at emergency shelters, the

City’s current standard could limit the capacity to less than 20 beds, which is considered a constraint by the California Department of Housing and Community Development. Action HOU-5.1 is included in the Housing Plan to review and modify capacity standards for emergency shelters.

State law (Government Code Section 65583(4)(a)) requires emergency shelters to only be subject to those development and management standards that apply to residential or commercial development within the same zone, except that a local government may apply written, objective standards that include sufficient parking to accommodate all staff working in the emergency shelter, provided that the standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone. The City’s parking standards for residential development are based on the type of residential land use and vary based upon the zoning district. In residential and mixed-use zoning districts, the City requires parking for emergency shelters to be provided at one space per 200 square feet of floor area. According to RentCafe, a nationwide apartment listing website, the average size of a studio in San Carlos is 260 square feet, which is of similar size to the 200 square foot minimum per person required by State law for emergency shelters. The City’s parking requirements for emergency shelters is on par with those required for similar residential uses within the same zones, which is one space per studio unit, 1.5 spaces per one- or two-bedroom unit, and 2 spaces per three- or more bedroom unit. However, the parking required for emergency shelter is more restrictive than what is required for commercial

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uses, which is one space per 450 square feet for office, one space per 400 square feet for retail, and one space per 250 square feet for restaurant. Action HOU-5.1 is included in the Housing Plan to comply with State law.

Recent State Law (AB 101) requires that Low-Barrier Navigation Centers be allowed as a by right use in areas zoned for mixed-use and nonresidential zoning districts permitting (as an allowed use or conditionally) multi-family uses. The City will revise the Zoning Ordinance to ensure that the City meets the requirements of AB 101 (Action HOU-5.1).

Transitional and Supportive Housing

State law requires cities to allow transitional and supportive housing as a residential use in all zoning districts that allow similar residential uses (SB 2). In San Carlos, transitional and supportive housing are considered single-family or multi-family uses and are permitted by right in all residential and mixed-use zoning districts.

Effective January 1, 2019, AB 2162 (Supportive Housing Streamlining Act) requires supportive housing to be considered a use by right in zoning districts where multi-family and mixed uses are permitted, including nonresidential zoning districts permitting multi-family uses, if the proposed housing development meets specified criteria. The law prohibits the local government from imposing any minimum parking requirement for units occupied by supportive housing residents if the development is located within one-half mile of a public transit

stop. AB 2162 also require local entities to streamline the approval of housing projects containing a minimum amount of supportive housing by providing a ministerial approval process, removing the requirement for CEQA analysis, and removing the requirement for a CUP or other similar discretionary entitlements. The City of San Carlos is currently in compliance with this law as it allows by right transitional and supportive housing in all RS, RM and MU districts in San Carlos. Action HOU-5.1 is included in the Housing Plan to ensure compliance with the processing and parking requirements associated with AB 2162.

Single-Room Occupancy (SRO)

Single-room occupancy hotels and/or boarding homes are collectively referred to as SROs. SRO units are one-room units intended for occupancy by a single individual. It is distinct from a studio or efficiency unit, in that a studio is a one-room unit that must contain a kitchen and bathroom. Although SRO units are not required to have a kitchen or bathroom, many SROs have one or the other. Buildings that provide SRO dwellings are conditionally permitted in Residential Multifamily and Mixed-Use zoning districts, but may not be located on the ground floor along Laurel Street and San Carlos Avenue frontages.

Manufactured/Factory-built housing

State law requires that factory built/manufactured homes be considered a single-family dwelling and permitted in all zoning districts that allow single-family housing. Manufactured housing can be subject to design review, the same single-unit dwellings,

as shown in Table 4.4-12 (Timelines for Permit Procedures). The San Carlos Zoning Ordinance includes individual manufactured housing units installed on a foundation system pursuant to Section 18551 of the California Health and Safety Code under the definition of a single-unit dwelling, in compliance with State law. Manufactured homes are subject to the same development standards as conventional single-unit dwellings, and are allowed in the same manner and in the same zones as conventional or stick-built structures through the common definition of “dwelling”.

Accessory Dwelling Units (ADU)

An Accessory Dwelling Unit (ADU) is a residential dwelling unit that is detached from, attached to, or located within the living area of an existing primary dwelling unit on the same site. ADUs provide independent living facilities for one or more persons with a kitchen and bathroom facility and can be an important source of affordable housing since they are smaller than primary units and do not have direct land acquisition costs. ADU development expands housing opportunities for very low-, low-, and moderate-income households by increasing the number of rental units available within existing neighborhoods.

The State Legislature has passed numerous changes to the ADU requirements (previously known as second units) to promote the development of ADUs. These include allowing ADUs to be built concurrently with a single-family home, opening areas where ADUs can be built to include all multi-family and mixed-use zones, modifying fees from utilities such as special districts and

water corporations, and reducing parking requirements. The City updated the ADU ordinance to comply with recent changes to State law in November 2020. In San Carlos, consistent with the Government Code Section 65852.2, ADUs are permitted by right in all single-family, multi-family, and mixed-use zoning districts. Action HOU-3.3 is included in the Housing Element to ensure continued compliance with State laws as they may change over the course of the planning period and identifies additional measures to encourage and incentivize ADUs in the community.

Housing for Persons with Disabilities

Housing element law requires that, in addition to the needs analysis for people with disabilities, the Housing Element must analyze potential governmental constraints to the development, improvement, and maintenance of housing for people with disabilities; demonstrate local efforts to remove any such constraints; and provide for reasonable accommodations for persons with disabilities through programs that remove constraints.

Zoning and Land Use

A residential care facility is a single-family dwelling unit or multi-unit facility licensed or supervised by a Federal, State, or local health/welfare agency that provides 24-hour nonmedical care of unrelated persons who are handicapped and in need of personal services, supervision, or assistance essential for sustaining the activities of daily living or for the protection of the individual in a family-like environment. Under State Lanterman Developmental Disabilities Services Act (“Lanterman Act”),

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small State-licensed residential care facilities for six or fewer persons must be permitted in all zoning districts that allow single- or multi-family uses, subject to the same permit processing requirements and development standards; San Carlos is compliant with the Lanterman Act. The Zoning Ordinance subclassifies residential care facilities as follows:

- General – More than six persons
- Limited – Six or less persons
- Senior – Voluntary housing arrangement serving persons aged 60+; includes “continuing care” and “life care” facilities.

Limited Residential Care Facilities are permitted by-right in all residential and mixed-use zoning districts. General and Senior residential care facilities are permitted with a minor use permit in the RM-20, RM-59, MU-D-100 and 120, and MU-SC-120 zoning districts. All residential care facilities are subject to provisions of Section 18.23.200 of the San Carlos Municipal Code:

- Minimum distance between residential care facilities shall be 300 feet
- A six-foot-high fence shall be required to screen outdoor recreational areas
- All residential care facilities must be licensed and certified by the State of California.
- Drug and alcohol use on-site by staff and/or residents shall be prohibited.

Additionally, parking requirements for General and Senior Residential Care Facilities differ from those of single and multi-family residential developments as they are based on the number of employees rather than units. Limited Residential Care Facilities follow the same parking standards as the base requirement. Imposing differing development standards, such as parking or minimum distance between facilities, than those required for other similar residential uses within the same zone can be a constraint on housing for persons with disabilities. Action HOU-5.3 is included in the Housing Plan to review and revise development standards for residential care facilities and group homes to ensure the same standards are required for these uses as other residential uses of the same type in the same zone.

Requiring a Conditional (or Minor) Use Permit for residential care facilities for seven or more persons is viewed by the State as a potential constraint to housing for persons with disabilities. To address this constraint, the City will remove the requirement for a Minor Use Permit and allow residential care facilities for seven or more persons (both senior and limited) in all zoning districts where multi-family uses are allowed (Action HOU-5.3).

Definition of Family

The definition of “family” may limit access to housing for persons with disabilities when municipalities narrowly define the word, illegally limiting the development of group homes for persons with disabilities, but not for housing similar sized and situated families. “Family”, as defined in the San Carlos Municipal Code, means: one or more persons occupying a dwelling unit and living

together as a single nonprofit housekeeping unit and sharing common living, sleeping, cooking and eating facilities. Members of a family need not be related by blood but are distinguished from a group occupying a hotel, club, fraternity, or sorority house. This definition does not discriminate nor limit access to housing for persons with disabilities or other household types.

Reasonable Accommodation

Both the Federal Fair Housing Act and the California Fair Employment and Housing Act direct local governments to provide reasonable accommodation to rules, policies, practices, and procedures where such accommodation may be necessary to afford individuals with disabilities equal housing opportunities. While fair housing laws intend that all people have equal access to housing, the law also recognizes that people with disabilities may need extra tools for equity. Reasonable accommodation is one of the tools intended to further housing opportunities for people with disabilities. For developers and providers of housing for people with disabilities who are often confronted with siting or use restrictions, reasonable accommodation provides a means of requesting from the local government flexibility in the application of land use and zoning regulations or, in some instances, even a waiver of certain restrictions or requirements because it is necessary to achieve equal access to housing. Cities and counties are required to consider requests for accommodations related to housing for people with disabilities and provide the accommodation when it is determined to be “reasonable” based on fair housing laws and the case law interpreting the statutes.

- The City adopted a reasonable accommodation ordinance in 2011 (Chapter 18.33 - Waivers of the San Carlos Municipal Code). This chapter outlines applicability, procedures, required findings, conditions of approval, and appeals in the process of applicants obtaining waivers and reasonable accommodations. Applications are reviewed for approval by the Planning Director. The City allows for waivers of 10 percent from standards for any project that can meet required findings: The waiver is necessary due to the physical characteristics of the property and the proposed use or structure or other circumstances, including, but not limited to, topography, noise exposure, irregular property boundaries, or other unusual circumstance.
- There are no alternatives to the requested waiver that could provide an equivalent level of benefit to the applicant with less potential detriment to surrounding owners and occupants or to the general public.
- The granting of the requested waiver will not be detrimental to the health or safety of the public or the occupants of the property or result in a change in land use or density that would be inconsistent with the requirements of this title.
- In the RS districts, the review authority must also make the following findings in addition to any other findings that this chapter requires:

- There are exceptional or extraordinary circumstances related to the design of the existing house or Uniform Building Code compliance or other code compliance that make it difficult or impossible to enlarge the house within the base requirements, and the addition is of superior design quality and compatible with the existing neighborhood character;
- The change is only intended to increase the habitability and function of the structure;
- Granting the waiver is desirable for the preservation of an existing architectural style or neighborhood character which would not otherwise be accomplished through the strict application of the provisions of the regulations; and
- It can be demonstrated that the design of the proposed addition is of superior quality; compatible with the existing neighborhood character, effective in minimizing the perceived size of the dwelling, not overly intrusive to the privacy of neighboring dwellings and is in substantial compliance with the RS district regulations.

If the request for accommodation is to provide fair access to housing, the following findings are required:

- That the housing or other property which is the subject of the request for reasonable accommodation will be used by an individual or organization entitled to protection;

That the request for accommodation is necessary to make specific housing available to an individual protected under State or Federal law;

- That the conditions imposed, if any, are necessary to further a compelling public interest and represent the least restrictive means of furthering that interest; and
- That denial of the requested waiver would impose a substantial burden on religious exercise or would conflict with any State or Federal statute requiring reasonable accommodation to provide access to housing.

The first set of findings identified above (for waivers) do not apply to reasonable accommodation requests. Only the second set of findings apply to reasonable accommodation requirements. The finding pertaining to a “compelling public interest” allows for subjectivity in the approval of a reasonable accommodation request, which could pose as a constraint for persons with disabilities. Action HOU-5.5 is included in the housing plan to review and modify as necessary to remove subjectivity within the approval findings.

Fees and Exactions

Housing construction imposes certain short- and long-term costs upon local government, such as the cost of providing planning services and inspections. As a result, the City relies upon various planning and development fees to recoup costs and ensure that essential services and infrastructure are available when needed. Impact fees are also charged to cover the cost of providing

municipal services or mitigating project impacts. These fees are summarized in Table 4.4-9. The total amount of fees varies from project to project based on type, existing infrastructure, and the

cost of mitigating environmental impacts. Most cities do not control school and water impact fees. These services are managed by separate districts.

Table 4.4-9: Development Fees

Fee Category	Fee Amount
Planning Application Fees	
Variance	\$11,983 (per project)
Conditional Use Permit – Planning Commission	\$8,987 (per project)
Minor Use Permit – Zoning Administrator	\$4,493 (per project)
Use Permits (Development Standards)	\$3,595 (per project)
Design Review – Single Family	
Single Family, New Home (RDRC)	\$8,216 (per project)
Single Family, First Floor Addition (RDRC)	\$5,689(per project)
Single Family, Second Floor Addition (RDRC)	\$8,216 (per project)
Single Family, First Floor Addition (Staff)	\$1,959 (per project)
Single Family, Second Floor Addition (Staff)	\$3,161 (per project)
Design Review – Multi-Family/Mixed-Use	
New Building – Planning Commission	\$13,483 (per project)
Major Alteration – Planning Commission	\$9,101 (per project)
Minor Alteration – Planning Commission	\$6,573 (per project)
Below Market Rate Housing Plan or Builder Alternative	\$2,097 (per project)
Below Market Rate Housing Agreement	\$2,696 (per project)
Plan Check for Building Permits	
Major (New Multi-Family/Mixed Use)	\$3,035 (per project)
Moderate (New Single-Family)	\$1,265 (per project)
Minor (Single-Family Additions, ADUs)	\$399 (per project)
Pre-Application Development Review	

Table 4.4-9: Development Fees

Fee Category	Fee Amount	
Major	\$6,500 (per project)	
Minor	\$3,500 (per project)	
Architectural Peer Review	\$3,000 initial deposit (per project)	
General Plan Amendment	\$11,983 (per project)	
Zoning Ordinance Amendment		
Major Rezone/PD/Map and Text	\$23,965 (per project)	
Moderate Rezone/PD/Map and Text	\$11,983 (per project)	
Minor Rezone/PD/Map and Text	\$5,991 (per project)	
Subdivision Fees		
Subdivision, major (5 or more lots)	\$23,965 (per project)	
Subdivision, minor (up to 4 lots) or for Condominium Maps	\$3,595 (per project)	
Lot Line Adjustment, Parcel Mergers	\$1,198 (per project)	
Conditional Exceptions	\$5,991 (per project)	
Lot Verification	\$599 (per project)	
Map Extension	\$1,198 (per project)	
Building Fees		
Building Permit Fee	Based on valuation and square footage	
Plan Check Fee	Based on valuation and square footage	
Electrical Permit – Multiple Family	\$206 plus \$0.08 for each square foot over 1,700	
Plumbing Permit – Multiple Family	\$206 plus \$0.08 for each square foot over 1,700	
Mechanical Permit – Multiple Family	\$206 plus \$0.08 for each square foot over 1,700	
Capital Facilities Fees		
	SFR	MFR
Parks (1)		
Park Facility Development Fee	\$2,651 per bedroom	

Table 4.4-9: Development Fees

Fee Category	Fee Amount	
In-Lieu Fee	In-lieu fee: Units in proposed subdivision X Acreage req. per dwelling unit within subdivision for park / rec. facilities X Fair market value per acre of land in subdivision	
Sewer Capacity Charges	\$13,242 per dwelling unit	\$6,125 per dwelling unit
Traffic Impact Fee	\$7,243 per dwelling unit	\$4,097 per dwelling unit
Affordable Housing Impact Fee	Incremental and applied only to rental projects with fewer than 7 units and ownership projects with fewer than 5 units	
Technology Fee	0.4% of total permit fee amount	

Notes:

(1): Not divided by single-family or multi-family development types.

Source: City of San Carlos, 2020. Effective 2020-2021

The City’s Below Market Rate (BMR) Ordinance requires either the building of affordable housing units or the payment of in-lieu fees. Rental projects with seven or more units and ownership projects with five or more units must build the affordable units on site. Projects smaller than this threshold pay an in-lieu fee. Projects that result in a fractional unit of less than 0.5 can opt to pay an in-lieu instead of providing an additional unit. Any calculation that results in a fraction greater than 0.5 is required to build the additional unit.

Government Code Section 65940.1(a)(1) requires jurisdictions to post all up-to-date fees on their website. San Carlos’ latest fee

schedule can be accessed on the City’s website under the Administrative Services Department, Finance Division, and City Fees and Cost of Services. In addition to fees, all zoning and development standards are posted on the website, along with inclusionary requirements, and as fee schedules are updated, the City’s website is updated as well. To determine fees charged by San Carlos and the other jurisdiction in San Mateo County, the 21 Elements Working Group conducted a survey of all jurisdictions in the county, asking that each provide fee information for various types of residential developments.

Table 4-4.10: Total Fees (Includes Entitlement, Building Permits, and Impact Fees) per Unit

	Single Family	Small Multi-Unit	Large Multi-Unit
Atherton	\$15,941	No Data	No Data
Brisbane	\$24,940	\$11,678	No Data
Burlingame	\$69,425	\$30,345	\$23,229
Colma	\$6,760	\$36,590	\$17,030
Daly City	\$24,202	\$32,558	\$12,271
East Palo Alto	\$104,241	No Data	\$28,699
Foster City	\$67,886	\$47,179	\$11,288
Half Moon Bay	\$52,569	\$16,974	No Data
Hillsborough	\$71,092	No Data	No Data
Millbrae	\$97,756	\$6,824	\$55,186
Pacifica	\$33,725	\$40,151	No Data
Portola Valley	\$52,923	No Data	No Data
Redwood City	\$20,795	\$18,537	\$17,913
San Bruno	\$58,209	\$72,148	\$39,412
San Carlos	\$72,046	\$29,137	\$18,182
San Mateo	\$89,003	\$60,728	\$41,547
South San Francisco	\$81,366	\$76,156	\$32,471
Unincorporated San Mateo	\$36,429	\$15,088	\$3,344
Woodside	\$70,957	\$82,764	No Data

Jurisdiction-imposed fees represent a small percentage of the overall cost to develop new housing. However, there are situations in which fees or permitting processes may pose a constraint on housing production. If a jurisdiction's fees are significantly higher than neighboring or peer jurisdictions, the fees could have the impact of discouraging projects within the jurisdiction. With construction costs high, it is difficult (near impossible) for moderate- or low-income housing to be profitable. High fees can be a constraint to housing development. This is particularly challenging for deed restricted affordable housing developers.

Most, if not all, developers consider any fee a significant constraint to the development of affordable housing. For 100% affordable housing projects, financing generally includes some form of state or federal assistance, with rents set through the funding program. As such, fees cannot and do not increase the rents. Although the various fees account for a significant portion of the development cost, the fees collected are necessary to pay for much needed infrastructure and to help mitigate new growth throughout the city. San Carlos provides impact fee reductions and waivers to help support 100% affordable housing projects.

For example, all development impact fees were waived for 817 Walnut (unless the fees were collected by an agency other than the City of San Carlos).

Out of the jurisdictions that provided data, San Carlos' fees are fifth highest for single family development (out of 19 jurisdictions), but sixth lowest for small multifamily development (out of 15 jurisdictions) and sixth lowest for large multifamily development (out of 12 jurisdictions). If fees (per dwelling unit) are higher for multi-family construction than for single family construction within a jurisdiction, this could be seen as a constraint on naturally affordable multi-family housing and also a fair housing issue. This is not the case in San Carlos. Fees for both small and large multi-family construction are lower than for single family development. Similarly, a permitting process that is more onerous or uncertain for multi-family units than for single family may present a fair housing concern and could be considered a constraint on multi-family housing. In San Carlos, permitting times for multi-family projects are not significantly longer than for single family projects when accounting for the size and scope of the project.

Table 4-4.1 I: Total Fees as a Percentage of Total Development Costs

	Single family	Small Multi-Family	Large Multi-Family
Atherton	0%	No Data	No Data
Brisbane	1%	1%	No Data
Burlingame	3%	4%	3%
Colma	0%	4%	2%
Daly City	1%	4%	2%
East Palo Alto	4%	No Data	4%
Foster City	3%	6%	2%
Half Moon Bay	2%	2%	No Data
Hillsborough	3%	No Data	No Data
Millbrae	2%	8%	7%
Pacifica	1%	5%	No Data
Portola Valley	1%	No Data	No Data
Redwood City	1%	2%	2%
San Bruno	2%	8%	5%
San Carlos	3%	4%	3%
San Mateo	3%	7%	5%
South San Francisco	3%	9%	4%
Unincorporated San Mateo	1%	2%	0%
Woodside	2%	9%	No Data

Note: Calculations use average soft costs (including an average of jurisdiction charged fees) and average land costs for the county.

Compared to other jurisdictions in San Mateo County, San Carlos’ fees were found to be comparable and do not to pose a significant constraint to housing development in the community.

Processing and Permit Procedures

Processing and permit procedures may pose a considerable constraint to the production and improvement of housing. Common constraints include lengthy processing time, unclear permitting procedures, layered reviews, multiple discretionary review requirements, and costly conditions of approval. These constraints increase the final cost of housing, uncertainty in the development of the project, and overall financial risk assumed by the developer.

Processing Timelines

The City of San Carlos’s development review process is designed to accommodate housing development applications of various levels of complexity and requiring different entitlements. Processing times vary with the complexity of the project. The tables below outline the typical timelines for various residential projects in the City of San Carlos. Table 4.4-12 focuses more specifically on the individual entitlement approvals that may be required, providing estimated processing timelines for each as well as identifying the approving body. Table 4.4-13 generally identifies the typical approvals required for single-family and multi-family projects along with the estimated processing times of the planning and building divisions.

Table 4.4-12: Timelines for Permit Procedures

Type of Approval, Permit, or Review	Typical Processing Time
These time periods begin when a complete application is submitted and are extended when additional information is requested by the City. The timeframes below are target issuance date—when the applicant can expect a decision on their application.	
Ministerial Review	30 days
Conditional Use Permit	45-120 days
Zoning Amendment (Zone Change)	9-12 months
General Plan Amendment	9-12 months
Site Plan Review	30 days
Design Review - Single Family	3-5 months
Design Review - Multi-Family (small)	5-8 months
Design Review - Multi-Family (large)	7-12 months
Design Review - Mixed Use	7-12 months
Tract Map	4-6 months
Parcel Map	2-4 months
Initial Environmental Study	2-3 months

Table 4.4-12: Timelines for Permit Procedures

Type of Approval, Permit, or Review	Typical Processing Time
Environmental Impact Report	6-8 months
Building Permits	
New Multi-Family	6-8 weeks
New Single Family Residence	4-6 weeks
Single-Story Addition	2-4 weeks
Second-Story Addition	3-5 weeks

Single-family dwelling unit applications typically take three to five months to receive planning approval for a single residential unit on one lot; and four to six weeks for building permit issuance. Subdivisions to obtain a tentative map are typically processed within six to nine months; building permits are generally issued within three to five months. Review time always varies based upon response time of the applicant to plan review comments. Most projects typically receive Building Division Plan Review comments within 15 to 20 working days, and rechecks are always performed within 10 to 15 working days. Because planning permits are processed concurrently (i.e., Design Review is processed concurrently with any required Use Permit or Grading Certificate) the timeframe for Design Review indicated in Table 4.4-12 is essentially the same amount of time that it takes from application submittal to receive entitlement approval. As such, small multi-family development applications generally receive entitlements within five to eight months and large multi-family applications receive entitlements within seven to twelve months; followed by building permits which are typically issued

within six to eight weeks. The processing timelines for multi-family residential and mixed-use projects are not significantly longer than what is typical for single-family residential projects; however, the longer timeframes reflect significantly more complicated projects. As shown in Table 4-4.14, the overall processing times for residential development in San Carlos are comparable to surrounding jurisdictions. To address the slightly longer relative timeframes for multi-family development, when compared with surrounding jurisdictions, the City has added Action HOU-4.4 to the Housing Plan to revise design review criteria to be fully objective, removing subjectivity from the findings and approval processes. This effort is anticipated to reduce overall permit review timeframes. Action HOU-4.4 also includes biennial evaluations to ensure processing timeframes are reduced, and calls for additional actions if necessary to reduce timelines if identified measures do not sufficiently address the constraint.

Table 4.4-13: Permitting Requirements per Development Type

	Single-Family Residential	Multi-Family Residential and/or Mixed-Use District
Typical Approval Requirements	Staff Level Design Review	Design Review Permit
	Residential Design Review Committee (RDRC) Review (1)	Residential Design Review Committee (RDRC) or Planning Commission Review
	Planning Commission (2)	Planning Commission (2)
Est. Total Processing Time	Planning = 3-5 months Building Permits = 4-6 weeks	Planning = 5-12 months Building Permits = 6-8 weeks

Notes:

1. New homes and projects that result in greater than 3,000 square feet in area and meets or exceeds FAR thresholds identified in Table 18.29.030-A(1)
2. Planning Commission conducts design review for projects requiring Planning Commission approval, such as conditional use permits and variances.

Projects that exceed the minimum BMR requirements receive priority permit processing status. This means the project is assigned to senior staff and is expedited and placed as a priority on the case planner’s workload. These projects are often vetted with a two-member City Council Housing Subcommittee early on for support and program development. City planners then work closely with the applicant and the City’s Economic Development and Housing Manager as part of the BMR Housing Agreement Plan to determine levels of affordability and concessions. The Community Development Director is also involved throughout the process to ensure expedited review.

Long permitting processing times and permit processes that have a high degree of uncertainty (i.e., discretionary reviews or processes with multiple public meetings) increase the cost of housing development for developers, either by increasing their carrying costs as they wait for permits, or by increasing the chance that a project will be rejected after significant costs toward design and waiting have been incurred. In either case, a developer working in a jurisdiction with an onerous permitting process will generally demand higher profits to account for the increased risk, thereby increasing the overall development cost. The processing times in San Carlos are comparable to surrounding jurisdictions (Table 4-4.14). The City has worked to establish transparent and streamlined procedures for processing and permitting development applications.

Table 4-4.14: Permit Processing Times (in Months) – San Mateo County Jurisdictions

Jurisdiction	ADU Process	Ministerial By-Right	Discretionary By-Right	Discretionary (Hearing Officer if Applicable)	Discretionary (Planning Commission)	Discretionary (City Council)
Atherton	1 to 2	1 to 3	2 to 4	N/A	2 to 4	2 to 6
Brisbane	1 to 2	2 to 6	N/A	N/A	4 to 12	6 to 14
Burlingame	1 to 2	2 to 3	2 to 3	N/A	3-4; 12 if major	13 months
Colma	1 to 2	1 to 2	1 to 3	2 to 4	N/A	4 to 8
Daly City	1 to 2	2 to 4	N/A	N/A	4 to 8	8 to 12
East Palo Alto	1 to 3	8 to 12	6 to 14	20 to 40	20 to 40	20 to 40
Foster City	1 to 2	1 to 2	1 to 2		3 to 6	6 to 12
Half Moon Bay		1 to 2	2 to 4	3 to 6	4 to 12	6 to 15
Millbrae	0 to 2	3 to 6	1 to 3	3 to 8	3 to 8	4 to 9
Pacifica	1 to 2	2 to 3	4 to 5	5 to 6	5 to 6	7 to 8
Redwood City	2 to 3	3 to 4	N/A	8 to 10	12 to 18	18 to 24
San Bruno	2	3 to 6	N/A	3 to 6	9 to 24	9 to 24
San Carlos	1 to 3	1 to 3	2 to 4	6 to 12	6 to 12	8 to 12
San Mateo	4 to 8	1 to 2	4 to 7	N/A	9 to 12	9 to 13
South San Francisco	1	1	2 to 3	2 to 3	3 to 6	6 to 9
Unincorporated San Mateo	1 to 3	3 to 6	4 to 9	6 to 12	6 to 18	9 to 24
Woodside	1 to 2	1 to 2	N/A	N/A	2 to 6	3 to 8

The permit process only increases in complexity and duration when the circumstances of individual projects warrant extra consideration on the part of local staff and officials. This is especially true of the environmental review component of the process. However, the City has little flexibility to change this, since the California Environmental Quality Act specifies procedures that local jurisdictions must observe in reviewing the impacts of development projects. To extent possible, categorical exemptions or other statutory exemptions and streamlining are prioritized.

Ministerial Review

Planning review of routine over the counter permits includes zoning clearances, interpretations, modifications to existing permits, and accessory dwelling units. Ministerial actions are approved by either the Zoning Administrator or the Director.

Design Review

Most development projects in San Carlos are subject to Design Review, either by the Director, the Residential Design Review Committee, or the Planning Commission. The Design Review Permit process begins with the submittal of an application that is filed with the Planning Division. The application is checked for completeness within 30 days of submittal and fee payment.

Additions to single-family residences that result in less than 3,000 square feet of total floor area (including garages) are reviewed by the Director. All new homes in the RS zoning district, additions

that result in floor area greater than 3,000 square feet on lots less than 7,500 square feet, projects on sloped lots that pass FAR thresholds, and projects that require additional review at the direction of the Community Development Director require review by the Residential Design Review Committee. The Residential Design Review Committee (RDRC) is comprised of three members: a Planning Commissioner appointed by the Planning Commission; a resident volunteer appointed by the City Council; and an architect or design professional appointed by the City Council. New single-family homes in the RS zoning district involve a public hearing with the RDRC.

Projects in Multi-Family and Mixed-Use districts require a Design Review Permit and are approved by the Planning Commission, including standard public hearing requirements. Projects are reviewed against standards and provisions within the following:

- Title 18, Zoning, of the San Carlos Municipal Code;
- The General Plan and any applicable specific plans the City Council has adopted;
- Any applicable design guidelines adopted by the City Council;
- Any approved tentative map, use permit, variance, or other planning or zoning approval that the project required; and
- Design review criteria (Chapter 18.29.060 of the San Carlos Municipal Code):
 - The overall design of the project including its scale, massing, site plan, exterior design, and landscaping

- will enhance the appearance and features of the project site and surrounding natural and built environment.
- The project design is appropriate to the function of the project and will provide an attractive and comfortable environment for occupants, visitors, and the general community.
 - Project details, materials, signage and landscaping are internally consistent, fully integrated with one another, and used in a manner that is visually consistent with the proposed architectural design.
 - The project has been designed to be compatible with neighboring development by avoiding big differences in building scale and character between developments on adjoining lots in the same zoning district and providing a harmonious transition in scale and character between different districts.
 - The project contributes to the creation of an attractive and visually interesting built environment that includes a variety of building styles and designs with well-articulated structures that present varied building facades, roof lines, and building heights within a unifying context that encourages increased pedestrian activity and promotes compatibility among neighboring land uses within the same or different districts.
 - The design of streetscapes, including street trees, lighting, and pedestrian furniture, is consistent with the character of activity centers, commercial districts and nearby residential neighborhoods.
 - The proposed design is compatible with the historical or visual character of any area recognized by the City as having such unified character.
 - The project design preserves major public views and vistas from major public streets and open spaces and enhances them by providing areas to stroll, benches to rest and enjoy views, and similar amenities.
 - Parking areas are designed and developed to buffer surrounding land uses; complement pedestrian-oriented development; enhance the environmental quality of the site, including minimizing stormwater run-off and the heat-island effect; and achieve a safe, efficient, and harmonious development.
 - Lighting and lighting fixtures are designed to complement buildings, be of appropriate scale, provide adequate light over walkways and parking areas to create a sense of pedestrian safety, and avoid creating glare.
 - The proposed building design and landscaping supports public safety and security by allowing for surveillance of the street by people inside buildings and elsewhere on the site.

- Landscaping is designed to be compatible with and enhance the architectural character and features of the buildings on site, and help relate the building to the surrounding landscape. Proposed planting materials avoid conflicts with views, lighting, infrastructure, utilities, and signage.

The review authority may only approve a design review application if it finds that the application is consistent with the purposes of the chapter (the chapter establishes the design review procedure to ensure that new development supports the General Plan’s goal of creating a vibrant pedestrian- and transit-oriented core and distinctive neighborhoods and districts with a diversity of building types that provide continuity in scale and character with appropriate transitions, where needed. The specific purposes of the design review process are to:

- A. Promote excellence in site planning and design and the harmonious appearance of buildings and sites;
- B. Ensure that new and modified uses and development will be compatible with the existing and potential development of the surrounding area; and
- C. Supplement other City regulations and standards in order to ensure control of aspects of design that are not otherwise addressed) and with the following:

- The applicable standards and requirements of the Zoning Ordinance;
- The General Plan and any applicable specific plans the City Council has adopted;
- Any applicable design guidelines adopted by the City Council;
- Any approved tentative map, use permit, variance, or other planning or zoning approval that the project required; and
- The applicable design review criteria in Section [18.29.060](#), Design review criteria.

Design review projects may be appealed through the City’s standard appeal process.

The Housing Accountability Act (Government Code Section 65589.5) states that local jurisdictions may not deny, reduce the density of, or make infeasible housing development projects, emergency shelters, or farmworker housing that are consistent with objective local development standards and contribute to meeting housing need unless, based on a preponderance of evidence, adverse health or safety impacts exist. Objective standards and review processes that remove subjectivity from findings improves development certainty and can mitigate cost impacts. In order to ensure compliance with the Housing Accountability Act, Action HOU-4.4 is included to ensure

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compliance with the Housing Accountability Act requirements, through a study of the City’s Design Review process, procedures, findings, and standards, ensuring that subjectivity is removed from the process for those projects that comply with objective standards.

Conditional Use Permits

The Conditional Use Permit (CUP) review process is intended to apply to uses that are generally consistent with the purposes of the district where they are proposed but require special consideration to ensure that they can be designed, located, and operated in a manner that will not interfere with the use and enjoyment of surrounding properties or adversely affect the city’s infrastructure, the built or natural environment, city resources, or the City’s ability to provide public services. As indicated in Table 4.4-3 (Permitted Land Uses by Zoning District), no Conditional Use Permit is required for multi-family dwellings in residential zones (RM-20 and RM-59/100) and mixed-use zones (MU-D-100/120, MU-NB-120, MU-SC-120, MU-SB-100/120, MU-N-40/50/120). Supportive and transitional housing are also uses that are allowed by right. Processing for CUP applications normally does not exceed six months. Required findings for approval of Use Permits include:

- The proposed use is allowed within the applicable zoning district and complies with all other applicable provisions of this title and all other titles of the municipal code;
- The proposed use is consistent with the General Plan and any applicable specific plan;

- The proposed use will not be adverse to the public health, safety, or general welfare of the community, nor detrimental to surrounding properties or improvements;
- The proposed use complies with any design or development standards applicable to the zoning district or the use in question unless waived or modified pursuant to the provisions of this title;
- The design, location, size, and operating characteristics of the proposed activity are compatible with the existing and reasonably foreseeable future land uses in the vicinity; and
- The site is physically suitable for the type, density, and intensity of use being proposed, including access, utilities, and the absence of physical constraints.

A CUP is not required for multi-family development in San Carlos. As such, these findings do not apply. CUPs are only required for single-room occupancy developments and for bungalow court/small lot subdivisions in the RM-59 and RM-100 zones, with the intent of preserving these zones for higher intensity development. Action 4.4 is included in the Housing Plan to amend the Zoning Ordinance to include CUP findings for any applicable special residential uses to ensure that findings are objective and result in project approval certainty, consistent with Housing Accountability Act requirements.

Environmental Review

State regulations require environmental review of discretionary project proposals (e.g., subdivision maps, design review, use

permits, etc.). Design review of residential projects generally result in exemptions for single-unit dwellings and accessory dwelling units. Most multi-unit and mixed-use projects are found exempt based on the Infill exemption allowed by State law. In rare circumstances for complex projects, an Initial Study (and related Negative Declaration or Mitigated Negative Declaration) or even an Environmental Impact Report may be warranted. The timeframes associated with environmental review are regulated by CEQA. California Public Resources Code Sections 21080.1 & 21080.2 requires all jurisdictions to determine if a housing development is exempt from CEQA within 30 days of a project application determination of completeness, or to otherwise identify if an Environmental Impact Report (EIR) or other CEQA document will be required. San Carlos complies with this requirement and advises applicants early in the review process of the anticipated level of CEQA review.

The Community Development Director conducts a preliminary assessment of potential environmental issues as part of the review to determine whether an application for a development project is complete. The Director must determine whether an application is complete within 30 days of the date the application is filed with the required fee. If the Director determines that the application is subject to review under CEQA, within 30 days after determining that the application is complete, the Director determines if the project is exempt from environmental review pursuant to State law, CEQA Guidelines and any environmental guidelines that the City has adopted in compliance with CEQA.

In compliance with the Permit Streamlining Act, City staff ensures that non-legislative proposals are heard at the Planning

Commission within 60 days of receipt of an application being deemed complete.

SB 35 Approval Process

SB 35 requires cities and counties to streamline review and approval of eligible affordable housing projects by providing a ministerial approval process and exempting such projects from environmental review under the California Environmental Quality Act (CEQA). When the state determines that jurisdictions have insufficient progress toward their lower-income RHNA (very low and low income), these jurisdictions are subject to the streamlined ministerial approval process (SB 35 [Chapter 366, Statutes of 2017] streamlining) for proposed developments with at least 50 percent affordability. If the jurisdiction also has insufficient progress toward their above-moderate-income RHNA, then they are subject to the more inclusive streamlining for developments with at least 10 percent affordability. SB 35 will automatically sunset on January 1, 2026.

As of 2022, the City of San Carlos was determined to be subject only to SB 35 streamlining for proposed developments with 50 percent or greater affordability. The City has not received any applications or inquires for SB 35 streamlining. To accommodate any future SB 35 applications or inquiries, Action HOU-4.4 calls for the City to create and make available to interested parties an informational packet that explains the SB 35 streamlining provisions in San Carlos and provides SB 35 eligibility information. The development standards and regulations in the Zoning Ordinance are objective; however, Design Review

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Criteria are subjective. Action HOU-4.4 also specifies that City will revisit the Design Review Criteria to provide local guidance on design and standards for by-right projects as allowed by state law.

Environmental Constraints

The City of San Carlos is bounded by San Francisco Bay to the east and the coastal range foothills. The hillside areas of San Carlos are subject to special seismic and structural engineering issues, which can raise the cost of housing in those areas. Most of the East Side and Downtown are in a floodplain or have a high-water table, which can hinder development, particularly if underground parking is being considered. Areas in the hillsides are in very high fire severity zones.

The most serious constraints would be related to the City's proximity to major earthquake faults and liquefaction potential. Unfortunately, this constraint is common to most urban areas in the State of California. The San Francisco Bay Area contains numerous active faults and is considered seismically active. Numerous small earthquakes occur every year in the San Francisco Bay Region, and larger earthquakes have been recorded and can be expected to occur in the future. The Monte Vista – Shannon, San Andreas, and Pilarcitos are the major faults in the vicinity of San Carlos. The San Andreas Fault System, which is located about one mile west of the western border of the City, is the closest active fault system to the City. Other major earthquake faults in the San Francisco Bay Area include: the Hayward Fault, which is approximately 14 miles to the northeast, the Calaveras

Fault, which is approximately 21 miles to east, and the San Gregorio Fault, approximately 10 miles to the west. There are no Alquist-Priolo earthquake fault zones within the City. The City has added various goals, policies and actions in the new Environmental Safety and Public Services Element related to seismic safety for the City.

The potential impacts from slope instability in San Carlos is low. Most of the capacity on identified sites is located on relatively flat areas of the City and as such has a low risk of landslides and liquefaction. Liquefaction potential in the western hilly areas is low, while the flatlands and bay margins area have high liquefaction potential. Landslides occur on some of the upper hilly slopes, more commonly in the northwestern area of the City.

Flooding can be caused by heavy rainfall, long periods of moderate rainfall, or clogged storm drains during periods of rainfall. In rare instances, a break in a water pipe or water tank can also cause flooding. Storm drainage systems throughout San Carlos collect stormwater runoff from streets and convey flows to discharge points at local receiving waters to prevent flooding, although the capacity of these systems is designed based the frequency interval of a typical heavy winter storm (i.e., a 10-year storm) and may not be designed to accommodate more intense storms anticipated under climate change conditions. The inland flood hazard areas are primarily located along the Bay shore, Pulgas Creek, Cordilleras Creek, and Belmont Creek. Localized flooding can occur during peak flow times, mainly in the industrial/commercial areas of town which are located within

the 100-year flood zone. Flooding in the 100-year flood zone would not be expected to be more than a few feet deep. The City has identified specific flooding issues associated with Pulgas, Cordilleras, and Brittan Creeks. Some of the prior flooding problems near Pulgas Creek may have been solved by improvements at the Pulgas Creek culvert under the railroad track. Upstream erosion from Cordilleras Creek deposited at El Camino Real is a major contributor to flooding. The new Environmental Safety and Public Services Element (2023) contains goals, policies, and actions that would reduce potential flooding impacts. Chapter 15.56 of the Code (Floodplain Management) establishes construction requirements for development that would minimize flood hazard risks, including anchoring, elevation, and flood-proofing, and standards for utilities, subdivisions, residential, and non-residential construction. Environmental Management Element Action EM-5.10 requires implementation of the NPDES permit or preparation of a stormwater prevention plan and proposed ESPS Element Policies ESPS-2.4 and ESPS-2.10 (see Chapter 4.8 Hazards and Hazardous Materials) increase flood protection through reductions in impervious surface area and by requiring new development projects to incorporate storm drain systems that control runoff rates and volumes thereby preventing increases in downstream flooding potential.

San Carlos fire service is provided under contract by the City of Redwood City Fire Department. It provides fire protection, hazardous materials response, disaster preparedness, and emergency medical response. According to the updated

Environmental Safety and Public Services Element, the foothill neighborhoods west of Alameda de las Pulgas are designated Very High Fire Hazard Severity Zones (VHFSZ) by CAL FIRE. The Heather Elementary School and many homes in the western hills are also located within the VHFSZ designation. The vast majority of proposed housing sites to meet the RHNA and properties proposed for rezoning are not located within these VHFSZ-designated areas. In fact, only 22 of the 2,970 (or 0.7 percent) units identified in the sites inventory are in potential Fire Hazard Severity Zones. The updated Environmental Safety and Public Services Element (2023) contains the following goals, policies, and actions to address potential impacts related to wildland fires citywide.

Goal ESPS-3 Agency Coordination: A resilient San Carlos is well prepared to minimize risks associated with wildfire.

Policy ESPS-3.1 Promote and improve, as necessary, inter-jurisdictional fire prevention assessment, planning, and projection; and consultation and communication regarding disaster or emergency plans of San Carlos and Mutual Aid with adjacent agencies including but not limited to San Mateo County, Redwood City, Belmont, and CAL FIRE. **Action ESPS-3.1** Maintain participation in the Joint Powers Authority Agreement with all fire departments in San Mateo County to ensure required response times for initial emergency deployment personnel and equipment.

Action ESPS-3.2 Preserve the local government agreement with California Department of Forestry and Fire Protection (CAL FIRE) for responses in the Mutual Threat Zone (MTZ) within the Wildland Urban Interface (WUI) areas of the city. Continue to provide equipment and personnel under the mutual aid agreement, with the State of California Office of Emergency Service (OES) Region II. This continued “reverse support” enables the City of San Carlos to receive “no cost” statewide mutual aid in the event of a declared large-scale emergency.

Action ESPS-3.3 Collaborate with the regional fire agencies on strategies available to maintain defensible space, diverse plant composition (e.g., less combustible native plants), undertake appropriate thinning of vegetation, and maintain fuel breaks without permanently damaging native habitat.

Policy ESPS-3.2 Conduct annual training for fire, emergency medical, and police staff including cross training with adjacent automatic or mutual aid emergency response departments. Regularly maintain, test, and update training and equipment to meet current standards.

Policy ESPS-3.3 Ensure adequate Fire Department resources (fire stations, personnel, and equipment) to meet response time standards, keep pace with growth, and provide a high level of service to the community

Action ESPS-3.4 Continue to work with the Redwood City Fire Department to ensure that fire services are maintained at adequate levels. With subsequent Safety Element updates, assess and project future emergency service needs. Continue to monitor service area to ensure that all San Carlos areas have fire service. Monitor the City of San Carlos’ fire protection rating and work with the Redwood City and San Mateo County Fire Departments to correct deficiencies and to ensure ongoing training, including cross training is conducted.

Action ESPS-3.5 Train and educate public volunteers in basic fire safety response.

Policy ESPS-3.4 Locate essential public facilities out of high-risk, wildfire-prone areas including the VHFHSZ unless mitigation measures, above the minimum fire protection standards, are installed.

Policy ESPS-3.5 Prioritize infill development opportunities to prevent increased development in the WUI and Very High Fire Severity Zones (VHFSZ).

Policy ESPS-3.6 Minimize new development (residential and nonresidential) within the VHFSZ.

Policy ESPS-3.7 Consider the preservation of undeveloped ridgelines to reduce fire risk and improve fire protection.

Policy ESPS-3.8 Regularly review and confirm the City’s re-development policy for all structures in VHFSZs after large fires. If the City has an unwritten policy, adopt a written re-development policy.

Policy ESPS-3.9 Incorporate or require the incorporation of fire safety features in new development and re-development.

Policy ESPS-3.10 Require new residential developments to: have adequate fire protection; and be more wildfire resistant by establishing greenbelt zones for fire resistant landscaping.

Policy ESPS-3.11 Require new residential development to be designed in such a manner that reduces wildfire hazard and improves defensibility (e.g. clustering lots, managed greenbelts, water storage, fuel modification zones, and vegetation setbacks.)

Action ESPS-3.6 Discourage critical facilities being in the VHFSZ.

Action ESPS-3.7 Periodically re-evaluate the City’s policy allowing rebuilding in the VHFSZ. If the policy is unwritten, adopt a formal written policy.

Action ESPS-3.8 When a fire has occurred in the VHFSZ, evaluate if street design and size can be reconfigured to improve emergency access and evacuation efficiency.

Action ESPS-3.9 If development is permitted within the VHFSZ, require:

- a Fire Protection Plan addressing: risk analysis, fire response capabilities, fire safety requirements (defensible space, infrastructure, and building ignition resistance), mitigation measures and design considerations for non-conforming fuel modification, and wildfire education maintenance and limitations;
- landscape/fuel modification installation, incorporating open areas to complement defensible spaces, identifying possible refuge areas, and mapping and providing multiple ingress and egress routes;
- resident evacuation plans and ways to effectively communicate those plans, including identifying the location and direction of evacuation routes and at least two points of ingress and egress; and
- a roadside fuel reduction plan to prevent fires along public roads caused by vehicles.

Action ESPS-3.10 Enforce fire standards and regulations while reviewing building plans and conducting building inspections.

Policy ESPS-3.12 Ensure adequate water supply is available.

Action ESPS-3.12 Require new development projects have adequate water supplies to meet the fire-suppression needs of the project without compromising existing fire suppression services to existing uses.

Action ESPS-3.13 Work with water suppliers (Cal Water) to:

- maintain and ensure the long-term integrity of future water supply for fire suppression needs;
- ensure that water supply infrastructure adequately supports existing and future development and redevelopment;
- provide adequate water flow to combat structural and wildland fires, including during peak domestic demand periods. Water systems shall equal or exceed the standards of the latest edition of National Fire Protection Association (NFPA) 1142, “Standard on Water Supplies for Suburban and Rural Fire-Fighting.”;
- ensure water infrastructure can provide for peak fire flow; and
- identify where water infrastructure does not allow for peak fire flow and develop a plan to mitigate the deficiencies.

Policy ESPS-3.13 Ensure new and existing public and privately owned properties are constructed and

maintained in a manner that minimizes and reduces fire hazard threats and has adequate fire protection.

Action ESPS-3.14 Condition all new development and redevelopment to have adequate fire protection, incorporate and maintain fire safe design, including fuel modification zones, defensible space, two ingress/egress points, emergency vehicle access, and visible home addressing and street signage.

Action ESPS-3.15 Require the use of fire-retardant roofing material for all new construction and major remodels involving roof additions. Encourage property owners with shake shingle roofs to upgrade to fire-retardant materials.

Action ESPS-3.16 Continue to enforce the brush clearance/weed abatement program for both private and public roads as well as City-owned open spaces.

Action ESPS-3.17 Continue code enforcement programs requiring private and public property owners to maintain buildings and properties to prevent blighted conditions, remove excessive or overgrown vegetation (e.g., trees, shrubs, weeds), and remove litter, rubbish, and illegally dumped items from properties.

Action ESPS-3.18 Seek grants and other funding sources to assist low-income residents with home hardening efforts.

Action ESPS-3.19 Adopt an ordinance or update existing ordinances to require development standards that meet or exceed title 14, CCR, division 1.5, chapter 7, subchapter 2, articles 1-5 (commencing with section 1270) (SRA Fire Safe Regulations) and title 14, CCR, division 1.5, chapter 7, subchapter 3, article 3 (commencing with section 1299.01) (Fire Hazard Reduction Around Buildings and Structures Regulations) for SRAs and/or VHFHSZs.

Action ESPS-3.20 Within the VHFSZ, the City's building and planning departments will work with local fire departments, community organizations, and other responsible organizations to require and ensure:

- the installation of fire protection water system for all new construction projects including fire hydrant instillation, fire sprinkler, or suppression systems, and providing adequate fire flow;
- the long-term maintenance of defensible space clearances around structures, subdivisions, and fire breaks; and
- all structures rebuilt/re-developed after a large fire to comply with building and fire codes in effect at the time of the re-development.

Action ESPS-3.21 Conduct a survey of existing residential structures (including vegetation) within the VHFSZ identifying buildings that do not comply with fire safety standards. Consult with property owners to bring those

properties into compliance with the most current building and fire safety standards.

Action ESPS-3.22 Consider developing or improving structure hardening standards for community refuges (such as schools, hospitals, evacuation centers).

Action ESPS-3.23 Evaluate the City's roadways regarding access, alignments, etc. to facilitate fire, police, and ambulance access and resident egress in case of an emergency.

Policy ESPS-3.14 Provide adequate evacuation routes and access for fire and emergency service vehicles to all San Carlos areas.

Policy ESPS-3.15 Identify and implement measures to mitigate the single access roads and non-conforming roadways, as feasible.

Action ESPS-3.24 Identify streets and key intersections that, due to pavement width, hairpin turns, and tight curves, if not cleared of vehicles, may interfere with emergency vehicle access and/or resident evacuation during a fire.

Action ESPS-3.25 Identify the potential for street widening and improvement during regular Capital Improvement project maintenance, e.g., emergency

access, utility undergrounding, resurfacing, and American with Disabilities (ADA) compliance.

Action ESPS-3.26 Prohibit parking on one or both sides of a street identified as having the potential to interfere with emergency vehicle access and/or resident evacuation during a fire, when Red Flag alerts have been issued.

Action ESPS-3.27 In conjunction with the use of the Zonehaven system, supplement the evacuation plan as shown in Figure 8-12, with special emphasis placed on the areas that do not have sufficient access and egress identified on Figure 8-13. Recommend improvements to ensure adequate evacuation capabilities.

Action ESPS-3.28 Conduct a study to review evacuation routes, their capacity, safety, and viability under a range of emergency scenarios as set forth in AB 747. Determine remedial actions, as appropriate. Update evacuation plans with each update of the Safety Element to address changes in at-risk areas and populations.

Goal ESPS-4 Develop a community that proactively prevents wildfires and protects life, property, and infrastructure from urban and wildfire impacts.

Policy ESPS-4.1 Provide public education to promote community awareness and preparedness for self-action in the event of a major disaster or emergency.

Action ESPS-4.1 Partner with Redwood City Fire Department, San Mateo Sheriff Department, neighboring cities, regional agencies, local school districts, local businesses, and community organizations to:

- conduct emergency and disaster preparedness exercises that test operational and emergency response plans (including evacuation routes); and
- prepare and conduct public outreach regarding evacuation procedures and routes and defensible space.

Action ESPS-4.2 Identify at-risk populations that would be vulnerable during wildfire evacuations and provide information to the at-risk residents regarding defensible space and evacuation routes.

Action ESPS-4.3 Prepare and make available to the public a current map of areas subject to wildland fires as provided by the California Department of Forestry and Fire Protect (CAL FIRE).

Action ESPS-4.4 Implement a fire hazards education program to minimize risk for residential, commercial, and institutional uses.

- Provide training opportunities for residents for fuel modification methods, practices, and materials.

- Prepare and distribute two vegetation lists – one identifies recommended vegetation in the VHFSZ and the other identifies prohibited vegetation in the VHFSZ.

Action ESPS-4.5 Create and promote enrollment in a San Carlos emergency reverse dial program. Work with vulnerable populations to ensure enrollment.

Action ESPS-4.6 Consider establishing an outdoor warning system in the VHFSZ designed to alert residents about possible fire danger

San Carlos is a “built-out” city with scarce land available for development. The City of San Carlos has pursued a public investment strategy to create a pedestrian-friendly environment and encourage private residential investment on El Camino Real (the City’s designated Priority Development Area – PDA), in Downtown, and along San Carlos Avenue, within priority infill development areas.

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