

EAST BAY FOR EVERYONE

Debbie Chamberlain and Cindy Yee
Planning Services Division
7000 Bollinger Canyon Rd.
San Ramon, CA 94583
December 28, 2022

Dear Mrs. Chamberlain and Mrs. Yee:

East Bay for Everyone writes to help ensure San Ramon's second draft Housing Element will meaningfully help those who need housing in San Ramon. Our major concerns with this new draft are:

- San Ramon did not meaningfully commit to reducing parking minimums despite evidence from property owners that they serve as a constraint.
- San Ramon is using unrealistic development assumptions for its largest parcels, without substantial evidence that existing uses will discontinue.

11.5.5 Housing Programs

Program 18

We are very excited by this program and hope San Ramon will implement it to the fullest. We encourage San Ramon to target a higher number of units than 50 units, which amounts to about three acres of land. **San Ramon should target 200 units under this program instead of 50.**

We are also concerned that the upper density level proposed of 15 units/acre will not increase zoned capacity significantly compared to SB 9,¹ corresponding to only 2 or 3 units in the standard range of San Ramon single-family lot sizes. 3 units are already possible with SB 9 and ADUs, which will also be more attractive through ministerial approvals; the addition of a single attached unit is not likely to be attractive enough to justify the expense of high local land values plus demolition cost. **Consider amending the program to ensure missing middle projects are feasible on most lots in practice.** For example, the city could permit a fourplex on any parcel between 6-10,000 square feet (~17 DUA), and permit a triplex on any parcel smaller than 6000 square feet (22 DUA), with development standards applied only to the extent they do not bar such projects.

¹ Typical lot sizes of single-family homes in San Ramon, based on 16 lots selected by eye from a range of neighborhoods on CCMAP, average about 8,000 square feet. With a maximum 15 du/a, the 25th percentile lot we found of 6,975 s.f. would hold 2.4 (two) units, the median of 7,675 would hold 2.6 (three) units, and the 75th percentile of 9,925 would hold 3.4 (three) units.

We also recommend studying off-street parking standards to the list of development standards for Program 18 and consider moving to 0.5/unit ratios, as one-to-one ratios are likely to hurt the feasibility of missing middle projects.²

We encourage San Ramon to include Program 18 units toward its above moderate income RHNA allocation, using an expected yield formula similar to the one used for ADU's.

Parking minimums

The parking changes specified in Program 19 appear to be minimal, those required only to comply with state law. Parking will continue to likely be a constraint needing reduction, as shown by multiple studies.

The draft also notes the passage of AB 2097 without noting no site in San Ramon is likely to be affected by this law: [the MTC map of major transit stops](#) is blank between Walnut Creek and Dublin.

San Ramon presents a comparison to other nearby cities for parking requirements for a hypothetical 100 unit apartment complex (Table 11.3-4). Not only does San Ramon have the highest parking minimums included in the list, none of the comparison cities met their 5th Cycle RHNA allocation, suggesting that parking minimums constrain development in all of these cities and need to be reduced in all of them.

San Ramon should eliminate guest parking minimums, eliminate parking minimums entirely in the City Center core where many amenities are within walking or cycling distance, and set minimums to 1 space/unit for all other projects in the city.

Program 13

This program only commits to additional rezoning "if the buffer is diminishing" which leaves wide latitude. San Ramon should provide a specific number or percentage that qualifies as "diminishing," and clarify what it will increase the buffer to if it falls below that amount.

Sites Inventory

Because San Ramon is meeting more than 50% of its lower income RHNA on nonvacant parcels, San Ramon must include substantial findings that the existing use will be discontinued during the planning period. We find that evidence lacking.

Likelihood of nonresidential development

² The most prominent historical model of missing middle housing consistent with 1:1 parking ratios is the dingbat, parking tucked under the homes, which presumably San Ramon does not want to foster; it may already be banned by objective design standards.

HCD's October 2022 letter asked San Ramon to analyze the likelihood of nonresidential development on sites included in the inventory based on past trends. We do not find evidence in the draft that this analysis was completed or included for all sites.

PG&E conference center site

The inventory continues to place reliance on PG&E selling or redeveloping the SRV Conference Center entirely. Adding up multiple parcels, this appears to account for 439 total "realistic" units. Although it now notes that PG&E consolidated to leave a nearby parcel to be redeveloped, it continues to provide no evidence that it will leave this site in full, which would be required for this capacity.

Toyota site

The inventory also rates the Toyota site at 2451 Bishop Ranch as fitting 1,066 units. Although more text has been added to the notes column, it continues to provide no evidence that the owner intends to turn part of the site to residential use, merely elaborating on speculations that it would make sense. Page H.A-14 has the same notes from a Toyota representative we drew attention to in our previous letter, saying no change in status was anticipated. (It also does not discuss whether building over 60% of the site while keeping the existing use on the remaining 40% would be compatible with maintaining required off-street parking for the existing use.)

Bishop Ranch

The inventory newly indicates that Bishop Ranch sites 7, 8, and 11, accounting for a total of 2,084 realistic zoned units, were added for rezoning at the request of the property owner. While this is more evidence of redevelopment intention than exists for PG&E and Toyota, it still seems unrealistic given that the same Bishop Ranch owner has been approved to build 1,472 units in the planning period and has thousands more scheduled in later periods—does the developer have such capacity to balloon their own project in the first third of their 25-year plan?

2400 Old Crow Canyon

Our previous letter³ noted that similar language about this site was present in the 2015 Housing Element draft. San Ramon added a lot of words to the notes for this site without providing any evidence that the use will discontinue or that the property owner is interested in adding housing on this site.

Other sites

It is unclear why larger parcels are assessed to realistically produce 75% of their maximum zoned capacity while many others are assumed at 100%. 75% across the board would be more realistic, founded in experience.

³ Sent to HCD on June 10, available at <https://eastbayforeveryone.org/wp-content/uploads/2022/06/2022-06-09-san-ramon-housing-element-draft.pdf>

11.3 Constraints

Development Standards (Church of the Valley)

In June 2022 San Ramon received a letter from a pastor interested in building housing on church land.⁴ To make onsite affordable housing feasible, the pastor asked for increases in density (to 14-22 DUA), reductions in parking minimums, and less intense creek standards. The second draft lowers creek standards but does not increase density or lower parking minimums.

San Ramon should take feedback from property owners, especially those interested in building affordable housing, more seriously. We share the pastor's concerns about low densities and large parking minimums. San Ramon should rezone this site to meet the pastor's criteria.

On page 165 San Ramon notes the church can receive waivers in response for density bonuses, however, per HCD guidance the Housing Element is not supposed to include density bonuses in site feasibility calculations. Any density bonus should be a true "bonus" in addition to feasible base zoning. *"The analysis of "appropriate zoning" should not include residential buildout projections resulting from the implementation of a jurisdiction's inclusionary program or potential increase in density due to a density bonus."*

https://www.hcd.ca.gov/community-development/housing-element/docs/sites_inventory_memo_final06102020.pdf

Political and community opposition

A developer interviewed by San Ramon describes the experience of proposing 248 apartments on a parcel near downtown, which was met with opposition from residents and the Planning Commission. Instead they proposed 40 single family townhomes, which will not be as affordable, will not provide as much in tax revenue or impact fees, and will not help San Ramon meet its RHNA allocation nearly as much.

Community and political opposition serves as a significant constraint on development in San Ramon and this should be analyzed as part of the Housing Element, including the total number of units that were proposed vs. actually permitted after "community feedback."

11.1.3 Public Outreach

We received no email notification of San Ramon's second draft, even though we subscribed on May 11 to a San Ramon city listserv labeled "General Plan Housing Element Update." We also provided several comments on San Ramon's first Housing Element draft.

San Ramon released the draft for comment in the 7 day period including Christmas Eve, Christmas and the day after Christmas which is a federal holiday. It is difficult for our volunteers to turn

⁴ See attachment from EB4E to HCD, "San Ramon pastor asking for higher density, lower parking minimums" dated December 29, 2022.

around comments in seven days let alone when several of those days are part of the biggest holiday of the year, and daycares are closed.

If San Ramon submits subsequent drafts, we hope they will do a better job of notifying the public.

Conclusion

We look forward to continuing to engage with the City of San Ramon throughout the Housing Element Update and General Plan process.