SIERRA CLUB
LOMA PRIETA CHAPTER

SAN MATEO, SANTA CLARA & SAN BENITO COUNTIES

August 3, 2021

Michael Van Lonkhuysen
City of Daly City, Planning Division
333 90th Street,
Daly City, CA 94015

Via email to: mvanlonkhuysen@dalycity.org

Dear Mr. Van Lonkhuysen and the Planning Commission of Daly City,

Please oppose the preliminary plan and deny the subdivision map plan for Serramonte Del Rey.

1. It converts a public use into a polluting private use. The project should be designed with fewer but taller buildings to preserve Daly City's only community garden and orchard.
2. Preserve public uses, 50% of the site including the Community Garden should be preserved as open space.
3. The current subdivision plan adds to our dangerous polluting climate with an auto oriented development using public money instead of transit-oriented development.

In addition, we ask the project proponent to consider the following when they return with a redone subdivision map:

4. Require that 50% of the site be preserved as a public park with the project facing the park not the freeway. Require that the park include the existing 20-year-old community garden.
5. Require a higher percentage of affordable housing. BART builds 33-100% affordable housing. There is a demand for affordable housing across the state. At least 60% of the project should be affordable.
6. Require that the project be designed as a 5-minute neighborhood. This means all necessary services and public transit should be located within five minutes – schools, daycare, full grocery store, pharmacy, and BART station to ensure a low Vehicle Miles Travelled neighborhood. There should be a single u-shaped street through the project on which the bus that currently runs on Serramonte goes through the project to be transit oriented.
7. Require all electric passive buildings per the recently adopted reach code to reduce greenhouse gases over the lifetime of the units. The site should function as an island-able microgrid during grid instability such as Public Service Power Shutdowns.

8. Require that recycled waste and water be treated on site by designing a living building to reduce reliance on public funding of infrastructure.

    Example: Salesforce Tower in San Francisco uses a water recycling system to treat gray water and black water from the building, reducing the need for 30,000 gallons of freshwater a day.

9. Require carshare service to reduce parking at the rate of one per 20 as presently utilized in Austin, TX. All parking spots should provide electric charging stations. Require carshare and electric micro mobility hubs.
10. Require an electric shuttle through SamTrans to connect other destinations such as school and transit hubs.
11. Reduce the parking to 0.5 unbundled spaces per unit because of the shuttle and the 10-minute headway bus on Serramonte to achieve Transit Oriented Development status. The parking should be unbundled in a structure that is a park once and walk neighborhood. Unbundling reduces parking needs by about a 1/3 according to MTC and reduces cost by about 20% which would benefit the residents of this structure while not reducing revenue.

Explanation:

This project seeks to use public funds to reduce the public's access to greenspace and add pollution. It's impacts to public health come at a time of major fires and droughts when we must do more[1] to protect public health. Please advocate for strong environmental requirements to ensure public safety in new subdivisions in Daly City. Feasible solutions required by CEQA are included in each recommendation.

1. Fewer but taller buildings would ensure reduced grey infrastructure to reduce downstream runoff problems that both taxes public spending on stormwater and contaminates San Francisco Bay.
2. 50% site preservation retains green infrastructure to absorb runoff and retain carbon as a critical resource against rising greenhouse gases and ensure the health benefits of trees remain in Daly City.
3. The two major emitters in Daly City are internal combustion engine cars and natural gas. Both should be eliminated. The project asks for entitlements to add more than 1800 greenhouse gas emitting cars and 1235 units to the subdivision. At the same time, it claims to be transit oriented under MTC's guidelines. Designing the subdivision around a bus route would solve the problem and could reduce traditional driving by adding car share and other shared mobility services. Designing all electric as recommended by the recent reach code would eliminate greenhouse gas emissions from natural gas.
4. There is an extreme shortage of public greenspace in Daly City, much more so than in other Peninsula cities. There are no County parklands, County Park staff or County services. Facing the project towards retained green infrastructure provides

[1] https://www.nature.com/articles/s41586-019-1364-3

residents and the local community with passive and active recreation and gardening opportunities which have been in demand during Covid 19.

5. Affordable housing is in demand across the state. This project on public land with public funds should build more affordable housing. According to the Joint Center for Housing Studies at Harvard 60% of people who need housing can't afford to buy into the market in the Bay Area.
6. Cities are supposed to reduce Vehicle Miles Travelled to reduce greenhouse gases from transportation under AB32 and SB375. A Bus Oriented Development with an accompanying electric shuttle recommended in 9, and parking reducing in 11, guarantees Vehicle Miles Travelled reduction. The site is ideal for a bus-oriented development and reduced parking because surrounding streets do not have parking that would result in overflow problems from the project. The project is located in an Air Quality sewer surrounded by Highways 280, 35, and 1. Reduced driving would benefit Daly City with reduced air pollution[2] from the project as currently designed.
7. A microgrid is resilient in the face of grid instability during periods of extreme heat, emergencies, and Public Safety Power Shutdowns. A microgrid would provide power and ensure that heating and cooling is reduced by designing to passive standards. Passages in San Mateo is 950 units by the Hayward Park train that are being designed to passive standards. Passive is ideally prefabbed which also reduces cost like the recent affordable BART project across from the San Leandro BART station[3]. It would also ensure that the all-electric development had very low-cost power. The state is funding such projects under SGIP[4].
8. Traditional development as contained in the present subdivision map taxes public infrastructure and requires future public bond funding to replace sewer and water infrastructure. Treating waste on site provides recycled water for landscaping, gardening, and other functions such as flushing at a time when water usage is critically short in California.
9. The state intends to be fossil free in passenger vehicles by 2035. However, air and greenhouse gas pollution require cities to go electric faster. Starting with a walkable project in a five-minute neighborhood, with carshare, reduces the cost of electrifying parking considerably, by reducing the number of parking required. Increasing affordability will attract additional subsidies to achieve the goal.
10. An electric shuttle ensures connectivity beyond the reconfigured bus on Serramonte.
11. MTC says[5] that "Typical parking requirements subsidize driving, increasing drive-alone mode shares and act as a barrier to Smart Growth. In residential areas, the cost of building parking is passed on to the resident, increasing housing costs for all users, regardless of car ownership." Parking should be reduced and unbundled with carshare to meet AB32 and SB743. Designing for micro mobility reduces cost,

[2] https://www.who.int/health-topics/air-pollution#tab=tab_1

[3] https://www.bizjournals.com/sanfrancisco/print-edition/2015/10/30/san-leandro-bart-affordable-housing-modular-build.html

[4] https://www.stem.com/resources/incentives-programs/california-sgip/?gclid=CjwKCAjwr56IBhAvEiwA1fuqGutdSrL4yj_luY83D9UzhJ8xjESKIHHiJKNeA5sGukKa8XTHBCcPJhoC088QAvD_BwE

[5] https://parkingpolicy.com/reduced-requirements/

pollution, and greenhouse gases from the subdivision design. For examples see San Francisco and Oakland.

Sincerely,

Sabrina Brennan,
Chair, Equity Committee, Loma Prieta Chapter, Sierra Club

Gladwyn d'Souza
Chair, Conservation Committee, Loma Prieta Chapter, Sierra Club

Cc: James Eggers, Director
Loma Prieta Chapter, Sierra Club