Density Bonus Letter

O'Farrell Development LLC
311 9th Avenue
San Mateo, CA 94401

April 13, 2026

Elaine Ling
Principal Planner
City of San Mateo
330 W 20th Ave
San Mateo, CA 94403

RE: 1919 O'Farrell Street, State Density Bonus Law Letter of Intent

Dear Ms. Ling,

As you know, O'Farrell Development LLC formally submitted an application on April 13, 2026 (Application) for a 87-unit residential apartment housing development, including eight (8) units affordable to very low income (VLI) households and three (3) units affordable to low income (LI) households (Project) located at 1919 O'Farrell Street, San Mateo, California (City). The Application included notification of intent to apply under the California State Density Bonus Law (SDBL). As requested, this letter consolidates the Project's SDBL eligibility and requests as a supplement the Application. We also reserve all rights to modify its request for density bonus, identify and request any waivers, concessions/incentives as the Project moves through the entitlement process.

The Project is located within a Transit Priority Area in Plan Bay Area 2040, within ½ mile of major transit[1] with unobstructed access, and will provide much needed rental housing within walking distance of a number of shops, transit, employment, parks and services.

The purpose of the SDBL is to encourage cities to offer bonuses and incentives to housing developers that will contribute significantly to the economic feasibility of lower income housing in proposed housing developments.[2] As a preliminary matter, depending upon the specific amount and level of affordable housing provided, any project with more than five (5) residential units[3] may be eligible for all or any of the following separate categories:

[1] http://opendata.mtc.ca.gov/datasets/transit-priority-areas-2017?geometry=-122.396%2C37.539%2C-122.233%2C37.562
[2] Gov, Code § 65915.
[3] Gov. Code §65915(a)(1), (h) and (b)(1).

1) A **density bonus**, if requested the applicant, over the otherwise "maximum allowable residential density" defined by the maximum allowed in the General Plan;[4]

(2) Any (unlimited in number) **modifications/waivers of development standards** necessary to physically accommodate the development as proposed (meaning such standard would have the effect of "physically precluding the construction" of the proposed development), taking into account any concessions or incentives (e.g., height limit, setbacks, floor area ratio, lot coverage, etc.);[5]

(3) Up to a maximum of three (3) **incentives/concessions** that result in identifiable and actual cost reductions to provide for affordable housing costs (this does not require, but authorizes, a jurisdiction to consider fee reductions and waivers) depending on the level and amount of affordable housing provided;[6] and

(4) Specified **mandatory maximum parking** ratios.[7]

1. DENSITY BONUS

The Property is designated Residential Medium II in the General Plan, and zoned E1-1/R4, which allows a maximum of 99 units per acre. The Property is 0.71 acres or up to 71 units of base density (rounded up from 70.29). Because the Project proposes 8 VLI units, or eleven (11) percent of the base density, the Project is eligible for up to a density bonus of 35% of the base density or twenty-five (25) additional units or a total of 96 units.[8]

- ***The Project proposes a density bonus of 16units.***

2. PHYSICAL WAIVERS

A SDBL-eligible project may request a waiver or reduction of any development standards that would have the effect of *physically precluding the construction of the project at the densities or with the incentives permitted under the statute*.[9] The definition of a "development standard" includes a site or construction condition, including, without limitation, local height, setback, floor area ratio, onsite open space, and parking area ratio requirements that would otherwise apply to residential development pursuant to ordinances, general plan elements, specific plans, charters, or other local condition, law, policy, resolution, or regulation.[10] A request for a

[4] Gov. Code §65915(f) and (o)(2). "Maximum allowable residential density" means the density allowed under the zoning ordinance and land use element of the general plan, or, if a range of density is permitted, means the maximum allowable density for the specific zoning range and land use element of the general plan applicable to the project. If the density allowed under the zoning ordinance is inconsistent with the density allowed under the land use element of the general plan, the general plan density shall prevail. Gov. Code Section 65915(f) and (o)(2).
[5] Gov. Code §65915(e).
[6] Gov. Code §65915(k) and (l).
[7] Gov. Code §65915(p)(1).
[8] Gov. Code §65915(f)(2) and (g)(2) (allows rounding up). Calculation: 71 x 35% =25 (rounded up from 24.85). 71 + 25 =96.
[9] Gov. Code §65915(e).
[10] Gov. Code §65915(o)(1).

development standard waiver can be unlimited in number and neither reduces nor increases the number of concessions/incentives to which the developer is otherwise entitled.[11]

The Project requests the following **waivers**:

Per Table LU-1 of the San Mateo General Plan 2040, land use designation of Residential Medium II allows medium-density multifamily dwellings, such as condominiums and apartments, near mixed-use, office, and/or commercial areas a building height of 4-6 stories.

- ***The Project requests the City waive the required height limit as physically precluding the construction of the Project at the densities or with the incentives permitted under the statute***.

Per Table LU-1 of the San Mateo General Plan 2040, land use designation of Residential Medium II allows medium-density multifamily dwellings, such as condominiums and apartments, near mixed-use, office, and/or commercial areas a maximum density of 99 DU/Acre.

- ***The Project requests the City waive the density limit as physically precluding the construction of the Project at the densities or with the incentives permitted under the statute***.

Per Section 27.44.080 of the San Mateo Municipal Code, "No building or open parking areas shall constructed or enlarged unless the following yards are provided and maintained in connection with such buildings, structures, parking lots, or enlargements: yards not less than 15 feet along any street frontage. In addition, per Section 27.44.090(a) of the San Mateo Municipal Code, "When an E1-zoned plot is contiguous to any residential district, an adequate landscape buffer shall be maintained adjacent to the R-zoned property. The depth of this buffer along street frontages shall be at least equal to one-half the height of the building measured from the property line. The depth of this buffer along interior lot lines shall be at least equal to one-half the height of the building, or 15 feet, whichever is greater."

In order to allocate the requisite space for the Project, the Project proposes the required setbacks be reduced from the larger of 15 feet or one-half the height of the building be waived. The setback waiver is required to keep the Project's proposed 87 units. Without the reductions, the Project would need to significantly reduce the number of units proposed.

- ***The Project requests the City waive these required setbacks as physically precluding the construction of the Project at the densities or with the incentives permitted under the statute***.

Per Section 27.44.065 of the San Mateo Municipal Code, "A minimum of 35% at-grade open space shall be provided on the parcel. Open space shall contain landscaping and/or

[11] Gov. Code §65915(e)(2). We note that under the SDBL, the City may not request pro forma or other report demonstrating cost savings in connection with the above-requested physical waivers.

decorative outdoor landscape elements, water features, paved or decorated surfaces of rock, stone, brick or other similar material (excluding driveways, parking, loading, or storage areas), and sculptural elements.."

In order to allocate the requisite space for the Project, the Project proposes the required parcel coverage be waived. The parcel coverage waiver is required to keep the Project's proposed 87 units. Without the reductions, the Project would need to significantly reduce the number of units proposed.

- ***The Project requests the City waive the required parcel coverage as physically precluding the construction of the Project at the densities or with the incentives permitted under the statute***.

Per Section 4.1.1 of the Objective Design Standards, "Blank walls shall be limited to a maximum of twenty (20) feet in length on all stories." In order to allocate the requisite space for the Project, the Project proposes the blank wall requirement be waived. Due to the proximity of some of the parking garage walls to the property lines, allowable openings are limited by the building code. To comply with this requirement, the garage walls would need to set back further from the property lines but the Project would need to significantly reduce the number of units proposed.

- ***The Project requests the City waive the minimum blank wall requirement as the requirement and related necessary changes would physically precluding the construction of the Project at the densities or with the incentives permitted under the statute***.

The "A.5 Sidewalk Standards – Residential Type C New Development" (Pedestrian Design Guidelines) require an overall 9.5-feet sidewalk width (4.5 feet of planting and 5.5 feet through zone) and would require a redesign that would affect the density of the Project. We also note that there are utility constraints on-site such as location of meter boxes, back flow preventers and an above ground transformer all located at the frontage, the trash set up is located at the frontage next to the above ground transformer, and there will be grading constraints east of the garage ramp. Lastly, the Project is located at the end of a cul-de-sac with minimal frontage.

- ***The Project requests the City waive the minimum required sidewalk width to allow a 5' sidewalk width required setbacks as the wider sidewalk and related necessary changes would physically precluding the construction of the Project at the densities or with the incentives permitted under the statute***.

Per Section 27.64.265 (1) "Where the number of required spaces is from 10 to 100, 30% of such spaces may be provided pursuant to compact car standards." This waiver is required to keep the proposed parking design, due to the physical constraints of the site. The Project's parking layout is too constrained to provide the same number of parking spaces without increasing beyond 30% compact parking spaces. The site is physically constrained due to its uniquely inefficient shape, and also further constrained due to the shared goal with the City of preserving the existing heritage trees. The Project's parking layout has limited its footprint along the east and west in order to keep a safe distance from the heritage trees designated for preservation.

- ***The Project requests the City waive the maximum compact parking spaces requirement, as they would be physically precluding the construction of the Project at the densities or with the incentives permitted under the statute***.

In order to allocate the requisite parking spaces for the Project, the Project proposes the required standard parking space width from structural elements clearances of 9 feet and 10 feet to be be waived. This waiver is required to keep the proposed parking design, due to the physical constraints of the site. The Project's parking layout is too constrained to provide the required clearances from structural elements. The site is physically constrained due to its uniquely inefficient shape, and also further constrained due to the shared goal with the City of preserving the existing heritage trees. The Project's parking layout has limited its footprint along the east and west in order to keep a safe distance from the heritage trees designated for preservation.

- ***The Project requests the City waive the minimum parking space clearances from structural elements, as they would be physically precluding the construction of the Project at the densities or with the incentives permitted under the statute.***

3. CONCESSIONS/INCENTIVES

Separate and apart from physical waivers, the Project is eligible for two (2) concessions or incentives because the Project includes 11% - or more than 10% - of total units for very low income households.[12] (§ 65915(d)(2)(B)). This Project Application is currently requesting one concession/incentive, and reserves the right to modify this concession or incentive if necessary as the review of the design of the building proceeds.

Per Section 27.64.130 (e), "Turning aisles or ramps with two-way traffic shall have radii and aisle widths sufficient for two (2) automobiles to pass on the turn. Ramp widths on turns shall be as follows – Wall to wall dimension of 28' minimum for two-way ramp width. In order to preserve a majority of the on-site heritage trees for this project, the footprint of the parking garage levels requires a minimal footprint.

- ***The Project proposes to use reduce the wall to wall dimensions of the parking ramps of the proposed Project to 24 feet as a concession/incentive***.

4. MANDATORY MAXIMUM PARKING RATIOS

The Project is located less than ½ mile from major transit, is proving the maximum percentage of VLI units (11%) under SDBL Section 65915(f)(2), and has unobstructed access[13] to a major transit stop. Therefore under the SDBL, "upon the request of the developer, a city, county, or city and county shall not impose a vehicular parking ratio, inclusive of parking for persons with a

[12] Gov. Code §65915(d)(2)(B).

[13] "[A] resident is able to access the major transit stop without encountering natural or constructed impediments." Gov. Code Section 65915(p)(2).

disability and guests, that exceeds 0.5 spaces per unit." Therefore, the maximum parking ratio for the Project:

- 1 BR Units, 48 x 0.5 = 24
- 2 BR Units, 39 x 0.5 = 20
- Total Parking Required = **44 spaces**

Under the current design, the Project is applying under SDBL(p)(2), but proposes to voluntarily exceed the SDBL by providing a total of 93 spaces. This would provide for 1 onsite parking space per one bedroom units and 2 onsite parking spaces for two bedroom units with 6 guest parking spaces, which is permitted for rental projects utilizing the State Density Bonus.

We appreciate your consideration of this request. Please contact me should you have any questions regarding our proposed plans.

Respectfully submitted,



Victor Lo
O'Farrell Development LLC
311 9th Avenue
San Mateo, CA 94401