



Memorandum

TO: Town of Mammoth Lakes
FROM: Luci Hise-Fisher, AICP
Mike Harden
RE: **FLOOR AREA RATIO ANALYSIS**

DATE: September 30, 2014

INTRODUCTION/PURPOSE

The primary objective of this Floor Area Ratio Analysis (FAR Analysis) is to estimate the amount of development that could occur in the Town's commercial districts if up to a 2.5 floor area ratio (FAR) with no unit or room cap were to be adopted, and to establish whether that amount of development would exceed what is allowed under the existing Town of Mammoth Lakes 2007 General Plan (2007 General Plan). As further described below, the study area (Study Area) is comprised of approximately 122 acres of land designated Commercial 1 (C-1) and Commercial 2 (C-2) in the 2007 General Plan (General Plan) which include the zoning districts for Mixed Lodging Residential (MLR), Downtown (D), and Old Mammoth Road (OMR).

While this memorandum focuses on the FAR analysis, the next step in the process is to define the required General Plan amendments with specificity to support the environmental evaluation. In addition to the buildout analysis, this memorandum identifies the general character of changes needed to the General Plan. Specific amendments will be determined once there is consensus on the approach to the FAR standard.

BACKGROUND

2007 General Plan and 2014 Zoning Code Update

The Town's Zoning Code is the tool used to implement the General Plan. Thus, upon adoption of the General Plan in 2007 and pursuant to State law that requires consistency between the General Plan and the Zoning Code, the Town needed to update the Zoning Code to be consistent with the General Plan. Town Council initiated the Zoning Code Update (ZCU) with the goal of incorporating the 2007 General Plan into the Zoning Code, promoting sustainability in town, promoting quality and design, as well as cleaning up and modernizing the Town's zoning regulations in an effort to provide a streamlined and user-friendly set of standards that would clearly establish the type of permitted development (and permit process) while supporting the Community Vision.

During the course of the ZCU, a proposal was made to use a FAR of 2.5 to regulate the intensity of development in areas designated C-1 and C-2 in the General Plan, which include the MLR, D, and OMR zoning districts. While Town staff recommended the use of FAR in

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combination with existing density limitations in order to support consistency with the General Plan, Council directed staff to evaluate the implications of removing the density limitations and proceeding with a FAR standard alone as the means for regulating intensity in the Town's commercial districts. Accordingly, the ZCU adopted by the Town Council in May 2014 did not include the removal of the rooms/units per acre limitation in the MLR, D, and OMR zoning districts, in order to allow time to evaluate buildout in these areas with an FAR only limitation.

An iterative process was established in which assumptions and numbers were reviewed with Town staff during the process. After reviewing various iterations of the potential buildout using a 2.5 FAR, comparing the numbers with other Town projections as well as gaining input from the Town's traffic consultant, it was determined that a 2.5 FAR resulted in significantly higher than anticipated buildout projections. In particular, the amount of commercial development was considered not viable as it could not be supported economically and a determination was made to evaluate a lower FAR of 2.0.

People At One Time (PAOT)/Impact Assessment Policies

Given the nature of the Town, there is a permanent population as well as a seasonal population. Therefore, historically the approach to assess and limit growth developed by the Town was based on a People At One Time or PAOT concept. PAOT was established to describe population intensity and is a unique approach for regulating growth based on the Town's specific characteristics. Accordingly, Policy L.1.A of the General Plan states: *"Limit total peak population of permanent and seasonal residents and visitors to 52,000 people."*

However, in April 2009 the Town Council adopted the PAOT/Impact Assessment Policies, which included direction to *"(s)hift from PAOT based project evaluation to impact-based evaluation and mitigation."* The objective being to evaluate the potential impacts of a project relative to the quality of life and the environment rather than to focus on a particular number of people that could result from development. More specifically, rather than using the Town's PAOT model, which assumes 2.4 persons per permanent resident and 4.0 persons per transient unit, to evaluate a proposed development, potential impacts would be assessed on a project-by-project basis during the Project Impact Evaluation Criteria (PIEC) and/or environmental review, including but not limited to evaluations of air quality, including vehicle miles travelled (VMT); biological resources; cultural resources; geology and soils; hazards; hydrology; land use; noise; public services and utilities, including water demand; and transportation. An impacts-based approach is intended to help ensure that growth in the Town will not exceed the carrying capacity of infrastructure or other constraints, such as VMT and water supply, and that and significant environmental impacts identified will be mitigated to the extent feasible. This approach also takes into account the geographical distribution of development that is not accounted for in the PAOT approach.

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Based on the Town's direction to shift to an impacts approach, this FAR Analysis does not assess PAOT. Rather, the resulting square footage and number of units and rooms using FAR are compared with the development that could occur under the current regulations, which are based on a maximum number of units or rooms per acre. It is our understanding that the Town moving forward with FAR would still use PIEC or some variation in order to ensure that new development is assessed in terms of the environmental impacts.

Other Related Planning Efforts

There are a number of on-going planning efforts in the Town that relate to this FAR Analysis, especially with regard to buildout and in the interest of maintaining consistency between plans. These planning efforts include the Draft Mobility Element, District Plans and the Main Street Plan and are discussed below.

Mobility Element

The Town's 2010 Draft Mobility Element, which has not yet been adopted, proposes updates to the 2007 Mobility Element's goals, policies, and actions in order to achieve the overarching goals of the General Plan with respect to the triple-bottom-line and "feet-first" transportation strategies. The work undertaken in creating the traffic model and preparing the 2010 Draft Mobility Element included analysis of five alternatives, which assessed buildout of the General Plan, some added density in the commercial districts based on the 2009 PAOT model, and potential new roadways.

The Town needs to understand the implications of an FAR only limitation for the commercial districts, and how it would relate to the goals, policies and actions of the Mobility Element, as well as associated traffic analyses. Application of a FAR standard could allow a greater intensity of development than assumed in the 2010 Draft Mobility Element traffic model. Based on conversations with the Town's traffic consultant, the traffic model assumes a 0.25 FAR for commercial (retail, service, and office) development in the commercial zones. An objective of the FAR Analysis effort is to lay the groundwork for adoption of the 2010 Draft Mobility Element once development assumptions and General Plan amendments are clearly understood and assessed.

District Planning/Main Street Plan Codification

The Town has completed various neighborhood district plans in compliance with General Plan Policy L.1.D that directs the Town to "*Conduct district planning and focused studies for special areas and sites within the community to aid in future planning.*" The Town Council accepted a Townwide Plan entitled: Anticipating Mammoth's Future: Neighborhood District

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Planning: Concepts & Strategies. In addition, specific District Plans were completed including the North Old Mammoth Road – District Special Study (OMR District Plan) and the Downtown Neighborhood District Plan (DNNDP). Both the OMR District Plan and the DNNDP address portions of the Study Area. These district plans contain background information as well as assumptions for potential changes within the districts. In addition, the Town conducted a study along Main Street as a result of a decision to transform its Main Street corridor from an auto-dominated state highway that passes through Town into a pedestrian-first street that is downtown. In February 2014 the Town accepted the Main Street Plan, which envisions specific changes along Main Street, including an increase in the intensity of development and the removal of the frontage road. The Main Street Plan identifies properties along Main Street that are likely to develop, redevelop, or intensify over the course of buildout under the General Plan. These plans were reviewed as part of this FAR Analysis. The Town will need to evaluate if any of the recommendations from the District Planning efforts as well as the Main Street Plan should be included into the General Plan and Zoning Code (e.g. relinquishment of the frontage roads) amendments.

Community Benefits Incentive Zoning

The General Plan includes Policy L.3.F. “*Ensure appropriate community benefits are provided through district planning and development projects.*” In 2009 the Town Council adopted the Community Benefits/Incentive Zoning policy (CBIZ policy), which was intended to be a “bridge” between the General Plan and the District Planning work. Specifically, the CBIZ policy includes the following language:

This Community Benefits Incentive Zoning policy is intended as a "bridge" framework, to be applied to all pending project applications and plan documents until the Town has completed Community Planning documents and codified them. Once codified, the Town will have substantially established land use and development policies (including clearly specified limits on height and density) that implement the Town of Mammoth Lakes General Plan.

The Town has completed the District Planning process and has codified some of the District Planning documents (Main Street/Old Mammoth Road). A portion of this FAR Analysis effort will involve examining the CBIZ, and General Plan Policy L.5.G to determine if they are still warranted. CBIZ has been used to allow an increase in density or height, or exceptions to setback requirements. If the density cap is removed and there is no limitation on density, CBIZ would not be necessary for density increases. Additionally, General Plan Policy L.5.G. will need to be modified or eliminated as there would not be any doubling of density if the FAR limitation is enacted. Exceptions for height or setbacks could be addressed through an adjustment or variance.

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Transfer of Development Rights Ordinance

Action L.3.H.1. of the General Plan indicates that the Town should prepare a transfer of development rights ordinance. The FAR analysis looks at eliminating the density limitations within the Commercial Zones which would mean that density would essentially “lose its value” as there would be no density maximums in the Commercial Zones. If FAR is adopted and density limitations are removed, the Town will need to determine if a transfer of development rights ordinance for the commercial districts would be necessary. If the Town Council determines that it would not be necessary for the commercial districts, the General Plan could be updated to clarify this action.

FAR ANALYSIS STUDY AREA

As indicated above, the approximately 122-acre Study Area is comprised of properties with General Plan designations of C-1 and C-2. **Figure 1, Study Area**, shows the Study Area and the Study Area’s relationship to other planning study areas discussed above. The C-1 designation, which includes approximately 33 acres of land, is located along Main Street between the North Village District and Mono Street. The C-2 designation, which includes approximately 89 acres of land, is located primarily along Old Mammoth Road with a small area around the intersection of Old Mammoth Road and Main Street.

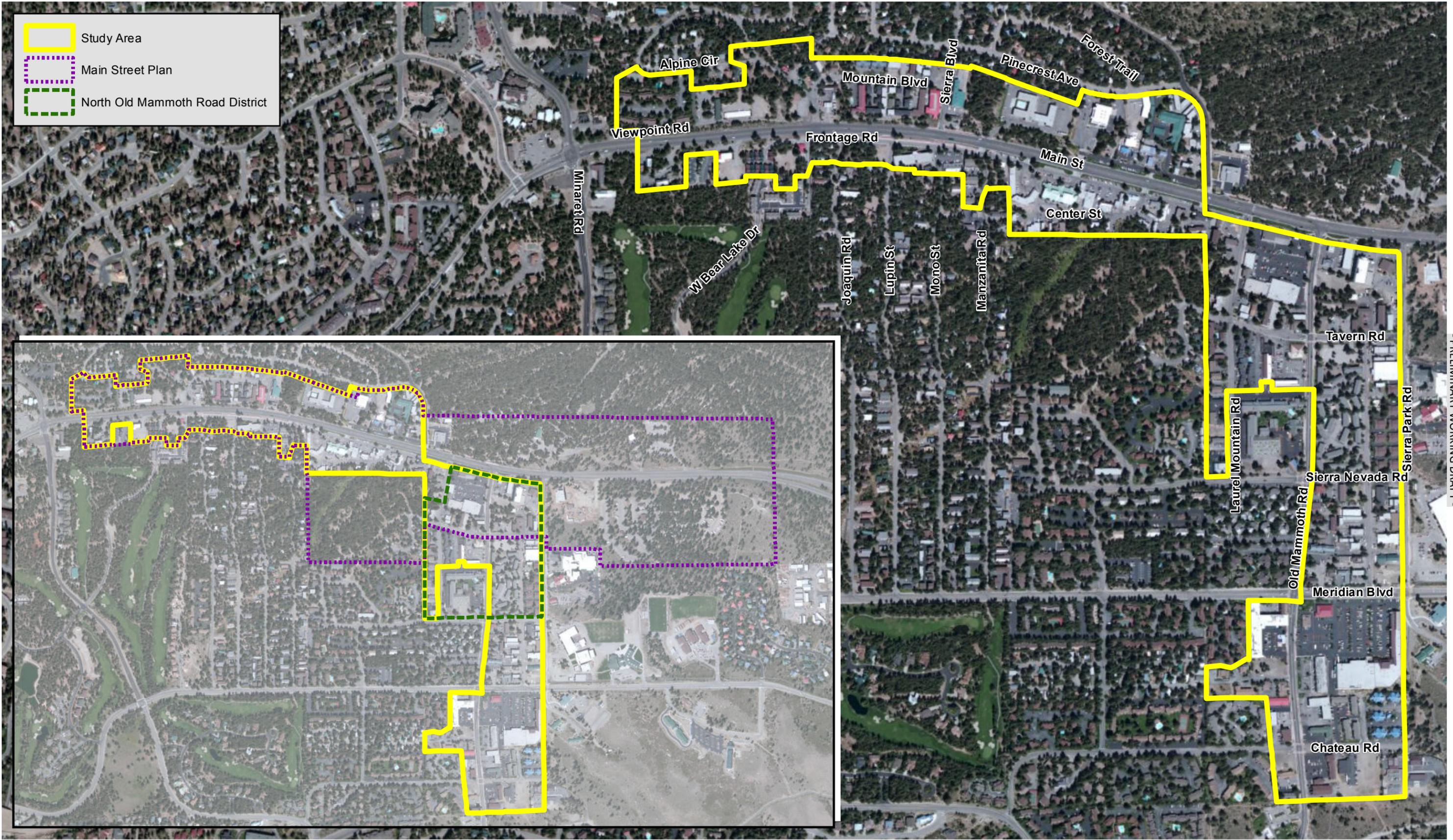
The C-1 designation allows medium-scale, commercial mixed uses. The base density for residential is six (6) dwelling units to a maximum of 12 dwelling units per acre and a maximum of 80¹ hotel rooms per acre. The C-1 area is intended to create a transition zone to the more intensive C-2 and North Village areas. The C-2 designation allows for medium- and large-scale commercial mixed uses. The density of development is the same as in the C-1. Intended uses include retail and office space for services as well as visitor lodging and residential uses.

As discussed above and shown in **Figure 2, Zoning Districts**, there are three commercial zoning districts associated with the C-1 and C-2 designations: MLR, D and OMR. The MLR district corresponds to the C-1 designation while the D and OMR generally correspond to the C-2 designation. Approximately 26 acres are zoned MLR; approximately 45 acres are zoned D; and approximately 51 acres are OMR.²

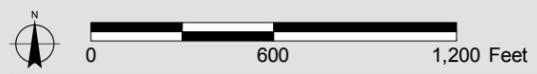
¹ The density within the Commercial Land Use Designations is a base of 40 rooms per acre with the potential for double density pursuant to General Plan Policy L.5.G.

² There is a discrepancy in the mapping of the C-1 and C-2 designations relative to the zoning districts. A correction will be included as part of the package of General Plan amendments that are processed as part of this FAR Analysis.

 Study Area
 Main Street Plan
 North Old Mammoth Road District

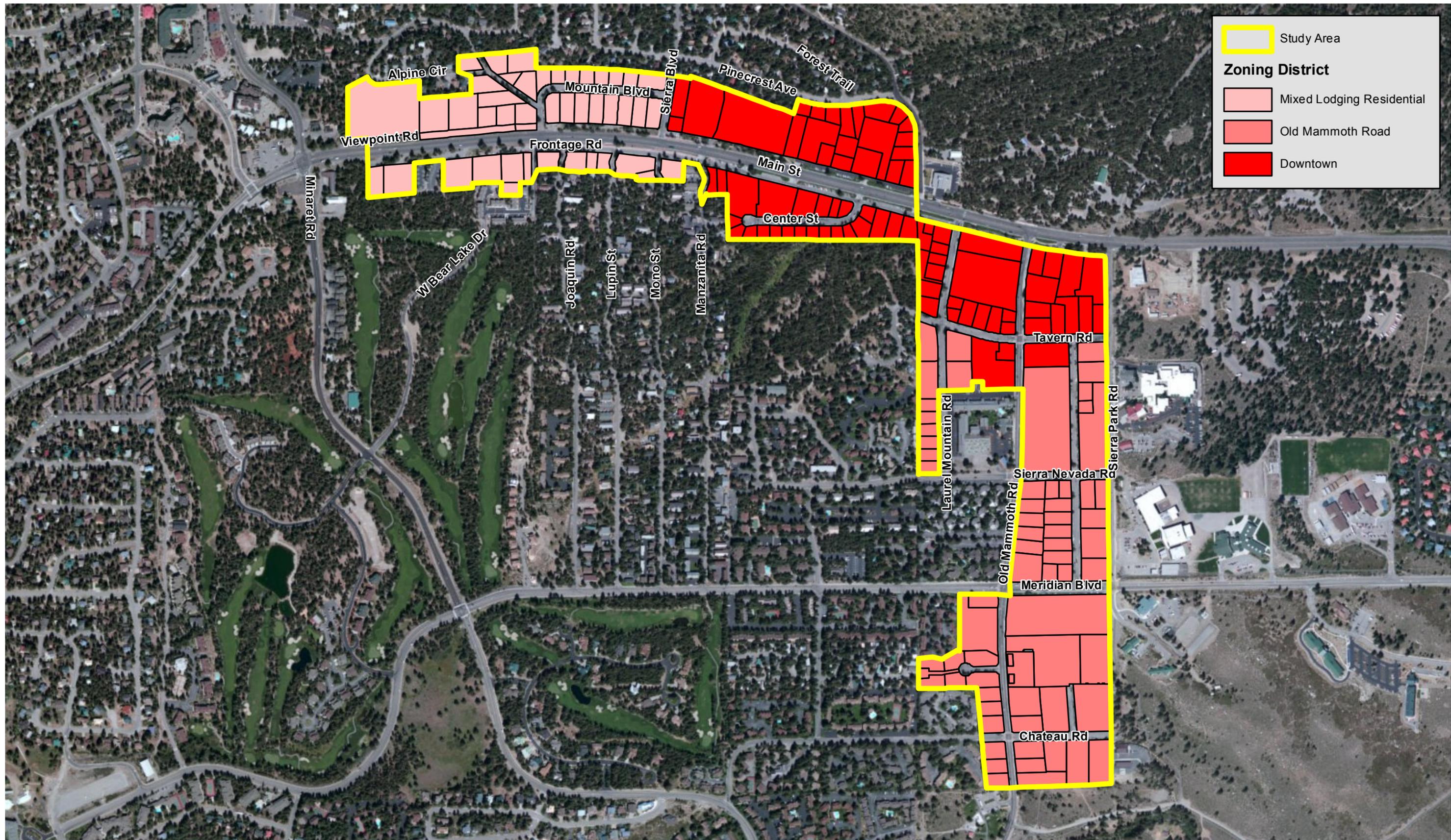


- PRELIMINARY WORKING DRAFT -



Study Area

Mammoth Lakes Zoning Code Update
 Source: Microsoft, 2010 (Aerial); PCR Services Corporation, 2014.

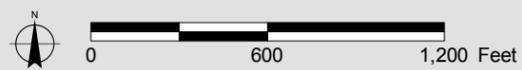


Study Area

Zoning District

- Mixed Lodging Residential
- Old Mammoth Road
- Downtown

- PRELIMINARY WORKING DRAFT -



Zoning Districts

FIGURE

2

Mammoth Lakes Zoning Code Update
 Source: Microsoft, 2010 (Aerial); PCR Services Corporation, 2014.

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The lands zoned MLR, D, and OMR primarily provide the commercial services for residents and visitors to the Town. Both areas are currently developed with a mix of land uses, and have a few scattered vacant parcels. The existing uses include retail, restaurants, cinema, equipment rental, storage, laundromat, gas stations, banks, pet supplies, offices, residences, visitor accommodations, and some construction related uses.

Main Street serves as the east-west thoroughfare through the Town. There is a frontage road that parallels both the north and south sides of Main Street, which creates a large setback for the businesses from the roadway. Angled parking is provided in pockets along portions of the frontage road. There are areas with slopes where the properties on the north side of Main Street sit above the road and areas on the south side that sit below Main Street. There is no sidewalk along Main Street or the frontage road.

Old Mammoth Road runs north-south and intersects with Main Street to form the primary entrance for visitors into the Town. This area is primarily developed with commercial strip malls geared to the automobile with large surface parking lots on most parcels fronting the roadway and the buildings set back from the streets. Residential development is intermixed with the commercial development and is primarily multi-family with a mix of large complexes and smaller 6- and 8-unit buildings. The buildings are low scale, generally one to two stories in height. Sidewalks are provided on both sides of the street.

OVERALL APPROACH AND METHODOLOGY

PCR reviewed numerous Town documents as well as conducted research with other jurisdictions that currently use FAR to regulate development. PCR also consulted with planners, architects, and developers regarding transient development (i.e., hotel and resort development). In addition, several steps were taken to determine the potential buildout of up to a 2.5 FAR compared with buildout under the existing General Plan. The key findings associated with the review of Town documents and the research undertaken are summarized below along with a description of the methodology used to determine buildout of up to 2.5 FAR.

Research Conducted and Review of Town Documents

PCR conducted research on jurisdictions that currently use FAR to regulate development to gain insights related to implementation of this approach to land use regulation for the Town. Attachment A, FAR Research, provides a summary of the findings of that research. As can be seen in the Comparison Matrix in Appendix A, the FAR allowed varies by jurisdiction and ranges from 0.5 to 2.75. The Town of Breckenridge and Aspen consider the use of a maximum height coupled with FAR limitations to be important. Aspen also has view plane regulations and design guidelines while Breckenridge established an historic district and has design guidelines for the

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district that protect existing views and address the scale of development relative to the surrounding uses. The Breckenridge and Aspen planners interviewed indicated that the use of FAR as a tool to regulate development has been generally successful for their jurisdictions, although both stated that the success of FAR was because it was coupled with other guidelines and regulations focused on heights, views, scale and other design considerations.

Other jurisdictions are re-evaluating the FAR allowed by their codes. While the City of Santa Monica allows 3.0 and 4.0 FARs, they are finding that a 2.5 FAR is high in terms of the intensity of development that is acceptable to the community. The City of Santa Monica identified Opportunity Sites in the Downtown, which are considered exceptional due to location, size, and ability to shape the Downtown, and allows an increase in development above the base FAR with the provision of community benefits. In discussing the General Plan Update that is underway in the City of Pasadena, the planner indicated that the City of Pasadena's land use designations include residential units/acre while the commercial and mixed use areas have FAR only. The highest FAR that Pasadena allows is 3.0 FAR with six (6) story height limit; the FAR for mixed-use is generally 2.25 and in some locations the FAR is 1.0. The City was advised by their consultants that in order to get vertical integration of uses a minimum of 1.5 FAR and three (3) stories should be allowed. The City of Pasadena is currently considering whether to continue with FAR or to use dwelling units per acre.

PCR and Town staff have reviewed numerous Town documents to understand the development of previous buildout assumptions used in the General Plan and associated work including the Main Street and District Plans, the Draft Housing Element, the Draft Mobility Element, the 2010 Urban Water Management Plan, the 2013 Economic Analysis of Case Study Sites: Mammoth Lakes Transportation Corridor Implementation Plan, the 2011 Mammoth Lakes Economic Forecast and Revitalization Strategies, the 2004 Development Impact Fee Calculation and Nexus Report, and the 2007 Development Fee Impact Justification Study. The primary purpose of reviewing these materials was to understand the methodology used to project buildout for the adopted General Plan and to understand the amount of development that could be supported by the Town.

The recent 2011 Mammoth Lakes Economic Forecast and Revitalization Strategies (EPS Study) provides buildout projections under the adopted General Plan.³ The purpose of the study was to provide 20 year development forecast and related population and employment projections to support long range planning efforts underway by the Town and other agencies. An objective of the study was to evaluate realistic levels of market demand with realistic assumptions regarding development capacity and redevelopment potential. The forecast

³ Final Report Mammoth Lakes Economic Forecast and Revitalization Strategies, Economic & Planning Systems, Inc., October 6, 2011.

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developed in the EPS Study is based on relevant market, socioeconomic and demographic data and trends as well as existing land use data and projections from the General Plan work and the related assessment of PAOT policy and the Town's travel demand model update. The study identified opportunity sites based on the remaining vacant land capacity, intensification of existing underutilized sites, and redevelopment of properties throughout the Town. Three scenarios, a low, medium, and high buildout scenario, reflecting a range of demand and supply, were developed. The EPS study indicates that the projections developed, including the high buildout scenario, did not exceed the allowable General Plan buildout or the amount of projected development analyzed in the General Plan EIR.

Potential Buildout Methodology

The methodology used to determine potential buildout using up to a 2.5 FAR with no unit or room cap required four steps: conduct a land use inventory; identify opportunity sites; determine potential future use; calculate potential buildout based on a set of assumptions developed with input from research conducted and review of Town documents. First, a land use inventory was conducted of the Study Area to identify parcels where development would likely occur within the timeframe of the General Plan. Next, potential future uses and buildout potential for these parcels was determined. The commercial square footage, number of dwelling units, and number of hotel rooms estimated for buildout were calculated based on a series of assumptions developed with input from staff. These assumptions are provided in Attachment B of this Memorandum. Attachment C, Comparison of Hotels, provides a summary of the research on hotel development that was conducted and used to determine the average room size. In addition, the projections were compared with the EPS Study.

After estimating the potential number of dwelling units and hotel rooms that could occur with up to a 2.5 FAR, a comparison was made to the development that could occur under existing regulations to determine if up to 2.5 FAR would allow an increase in development beyond what was assumed in the General Plan.

An iterative process was established in which assumptions and numbers were reviewed with Town staff during the process. After reviewing various iterations of the potential buildout using a 2.5 FAR, comparing the numbers with other projections including the EPS Study and the General Plan EIR, as well as gaining input from the Town's traffic consultant, it was determined that a 2.5 FAR resulted in significantly higher than anticipated buildout projections. In particular, the amount of commercial development was considered not viable as it could not be supported economically and a determination was made to evaluate a lower FAR of 2.0. The

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projections provided below reflect a 2.0 FAR.⁴ The following sections provide the results and findings of the process.

Land Use Inventory

PCR conducted a land use inventory of the Study Area in February 2014 to identify parcels that would likely change by 2035, which represents the planning period associated with the General Plan. In addition to the fieldwork, PCR conducted a series of interviews with Town staff and Planning and Economic Development Commissioners in February 2014 to further understand existing conditions, pending applications, and changes that have occurred or are underway in the Study Area. Existing GIS data, the Town's use and evaluation of the PAOT, and recent planning efforts were discussed. Input regarding properties that would likely redevelop during the timeframe of the General Plan was also obtained and the Main Street Plan and the EPS Study were reviewed with regard to properties that might redevelop or intensify as well. During the process PCR also had discussions with some property owners and other Town residents.

In order to facilitate development of the buildout forecast, the parcels within the Study Area were put into the following categories. The categories are created for conceptual purposes and are not intended to designate lands into specific categories.

No Change – Lands that are developed and on which there would likely be no sizeable redevelopment during the General Plan timeframe; generally, residential condominium developments were included in this category as they have enough useful life and the likelihood of all of the owners deciding to redevelop the property would be low.

Develop – Lands that are currently vacant and therefore have a high probability of developing during the General Plan timeframe.

Redevelop – Lands that are substantially underutilized where existing development would likely be demolished and the property redeveloped during the General Plan timeframe.

Intensify – Lands that are underutilized but the existing development would likely remain and additional square footage would be developed on the property during the General Plan timeframe.

Approved – Properties where an approval has been granted by the Town or where an application is pending.

⁴ The 2.5 FAR resulted in commercial square footage that was 50% higher than the 2.0 FAR. The lodging was 4% higher and residential units were 23% higher than under a 2.0 FAR scenario.

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Attachment D, Photographs, provides photos of properties in the Develop, Redevelop, and Intensify categories. Based on field work and discussions with Town staff and Planning and Economic Development Commissioners and using the categories above, **Table 1, Acreage in the Study Area by Category Within Commercial Zoning Districts**, provides a breakdown of acreages by category within each of the three commercial zoning districts in the Study Area. **Figure 3, Percentage of Acreage by Potential Development Category**, shows the proportion of land area within the Study Area in each of the potential development categories.

Table 1

Acreage in the Study Area by Category Within Commercial Zoning Districts						
District	Develop	Intensify	Redevelop	No Change	Approved	Totals
MLR	1.47	0	3.05	18.34	7.05	29.9
D	4.48	3.77	11.84	21.24	0	41.33
OMR	2.29	0	0.48	46.15	1.87	50.79
Totals	8.25	3.77	15.37	85.73	8.92	122.04

Acreage in Buildout = 27.39 acres (Develop + Intensify + Redevelop)

Acreage not included in Buildout = 94.65 acres (No Change + Approved)

As shown in Table 1 and Figure 3, approximately 95 acres or about 78 percent of the land area (No Change + Approved) within the MLR, D, and OMR zoning districts would not be expected to change during the General Plan timeframe. In other words, no additional units or substantial square footage would be added on this acreage given the age and characteristics of the existing development or a development approval. Based on Table 1, there are approximately 8 acres of vacant land within the Study Area, which would be assumed to develop during the General Plan buildout timeframe. Approximately 15 acres would likely redevelop, while approximately 4 acres would likely intensify. Of the approximately 122 acres within the Study Area, approximately 27 acres or approximately 22 percent of the land would be subject to development, redevelopment, or intensification of land use.

BUILDOUT PROJECTIONS

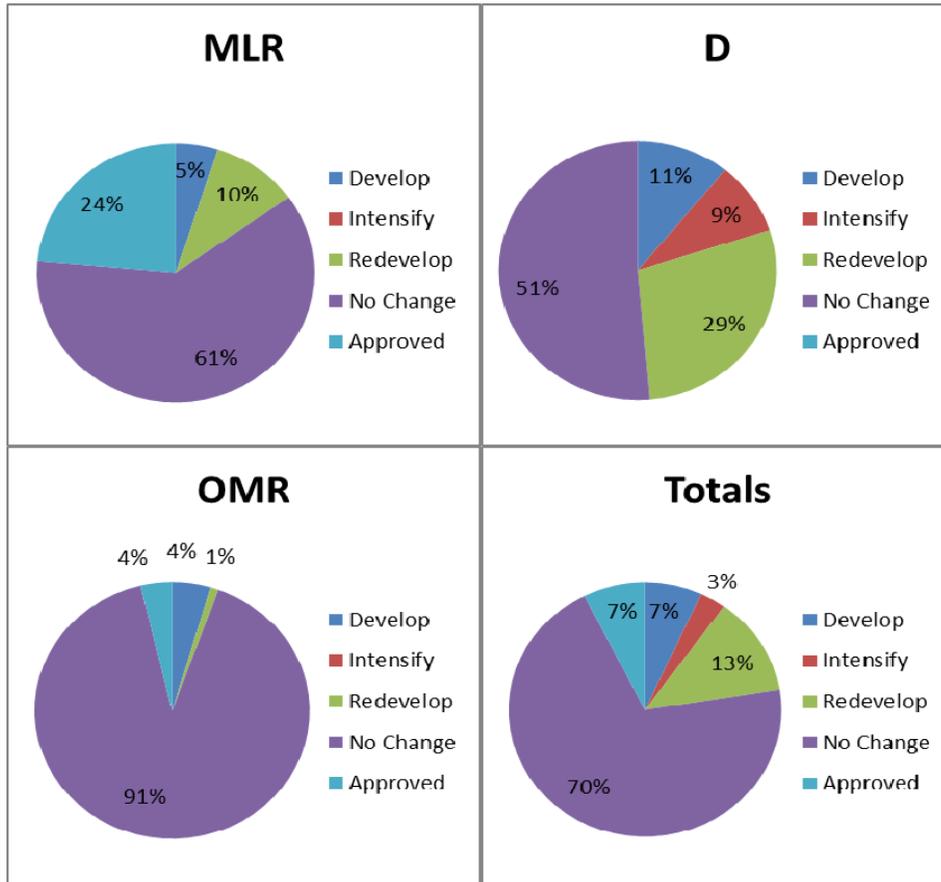
The process of determining future buildout associated with changes to a General Plan and/or Zoning Code is complex. There are multiple steps and assumptions that factor into development of buildout projections. Buildout refers to the maximum planned capacity of an area based on General Plan designations and demonstrates the maximum residential and non-residential development levels that could be achieved as a result of the development standards.

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Figure 3, Percentage of Acreage by Potential Development Category



Unlike a forecast, Buildout does not have a time horizon and generally does not take into account constraints, such as economics, physical site constraints (i.e., slope and other land suitability characteristics), transportation, or public service and utility infrastructure constraints. At a minimum, Buildout assumes maximum development on any vacant parcels within a study area. The Buildout projected in this FAR Analysis includes the vacant lands as well as some additional redevelopment or intensification potential.

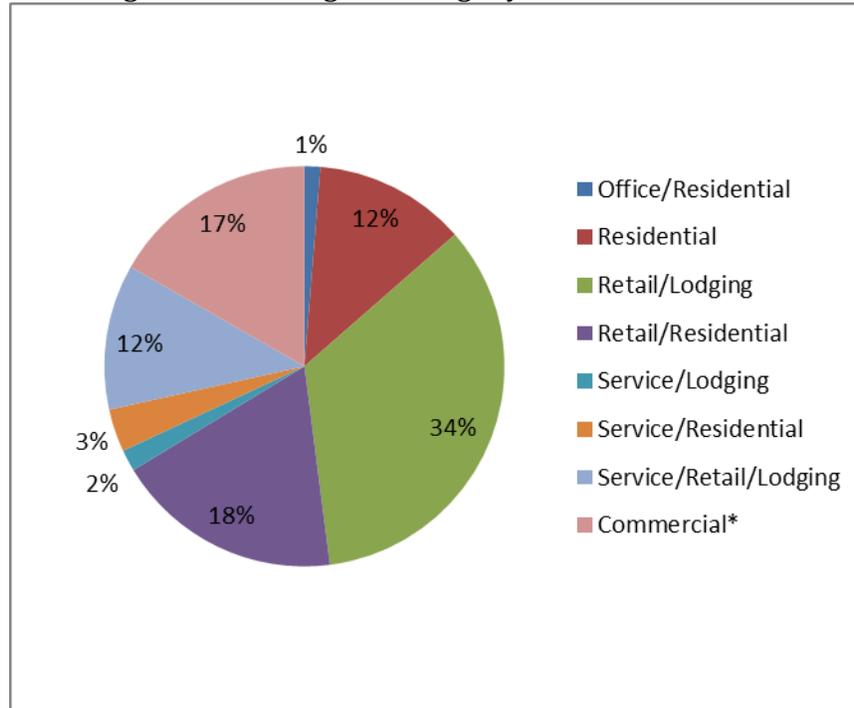
In order to project Buildout with the 2.0 FAR, potential future uses were identified for the parcels determined in the Land Use Inventory as likely to develop, redevelop, or intensify. **Figure 4, Percentage of Acreage by Potential Future Uses**, illustrates the percentage of potential future uses in the areas assumed for additional development.

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Figure 4: Percentage of Acreage by Potential Future Use



* "Commercial" includes Retail/Office, Service/Office and Service/Retail

A key assumption with regard to future uses is that most development would be mixed-use, with retail or service uses located on a portion of the ground floor of buildings, with office, lodging or residential uses above. As indicated in the General Plan, the C-1 area, or the western end of Main Street between the North Village District and Mono Street is intended to create a transition zone to the more intensive C-2 and North Village designations. As such, more residential uses are assumed along the western portion of Main Street; a concentration of retail/service/lodging is assumed along Main Street; and a mix of uses are assumed on Old Mammoth Road.

Based on the potential future uses identified within the Study Area, calculations of square footage, lodging (i.e. rooms), and units were made. While the FAR is a straight forward calculation (lot area in square feet x 2.0), a number of assumptions were made to project the amount of rooms and units as well as the proportion of commercial square footage that may result. For example, while ground floor commercial space is assumed, it was determined that some lodging or residential units could be developed on the ground floor as well. Therefore, for parcels that are commercial and lodging or residential, the calculations include an assumption that 25 percent of the ground floor would be developed with commercial uses and 75 percent

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would be developed with rooms or units. (Please see Attachment B for more detail regarding the assumptions.)

The assumptions used in this FAR Analysis do not go to the level of evaluating individual parcels to identify physical constraints, such as slope, that could reduce development potential as that would be speculative absent the necessary data. The projections presented in this report represent a conservative analysis since it would likely be difficult for smaller parcels to achieve a 2.0 FAR given the requirements for parking, open space, snow storage, and landscaping. However, it should be acknowledged that the 2.0 FAR could encourage lot merger, thereby increasing the size of a parcel for development and the likelihood of achieving a 2.0 FAR.

For properties with existing development (redevelop or intensify categories), a net increase in square footage, rooms, and units was determined by subtracting the existing square footage or units (permanent or transient) from the projected development where existing data was available. Information relative to the existing development was obtained from the assessor's office regarding existing square footage and information regarding the number of existing permanent or transient units was obtained from the Town's 2009 PAOT model run, the Town's Finance Department, and field verification. However, while the best available data has been used, there are some gaps in information.

Buildout in the MLR, D, and OMR Zoning Districts

Table 2, *Remaining Potential Buildout Within Commercial Zoning Districts*, provides a summary of potential development with a 2.0 FAR based on the potential future uses and assumptions described above and in Attachment B. As shown in Table 2, of the approximately 27 acres that would be subject to development, redevelopment or intensification of land use approximately 4.5 acres are zoned MLR, approximately 20 acres are zoned D and approximately three (3) acres are zoned OMR. Applying a 2.0 FAR to the 27 acres could result in approximately 2.4 million square feet of floor area. Assuming a mix of uses, generally with some retail and/or services uses on the ground floor as well as some office development, the 2.0 FAR could result in a net increase of approximately 425,084 square feet of commercial uses (retail, service, and office), with about two (2) percent in the MLR district, 70 percent in the D district, and 28 percent in the OMR district.

In terms of lodging, Attachment C provides a discussion of research conducted on hotel development, as well as a spreadsheet summarizing the characteristics of several hotel developments. For lodging, the 2.0 FAR could result in a net increase of 873 rooms.

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Table 2

Remaining Potential Buildout Within Commercial Zoning Districts

Category	Acreage	2.0 FAR	Net Increase Comm'l SF ^a	Net Increase Rooms ^b	Net Increase Residential Units ^c
MLR					
Develop	1.47	127,303	2,282	36	45
Redevelop	3.05	265,489	3,998	-39	139
Intensify	0	0	0	0	0
Subtotal	4.52	392,792	6,280	-3	184
D					
Develop	4.48	390,534	55,759	269	17
Redevelop	11.84	1,031,758	107,115	457	113
Intensify	3.77	328,618	150,792	114	0
Subtotal	20.09	1,750,910	313,666	840	130
OMR					
Develop	2.30	199,133	102,542	0	51
Redevelop	0.48	41,538	2,596	36	0
Intensify	0	0	0	0	0
Subtotal	2.78	240,671	105,138	36	51
TOTALS	27.39	2,384,373	425,084	873	365

Note: See Attachments B and C of this Memorandum for assumptions relating to the buildout calculations. This table provides the net Buildout, which subtracts existing development from the projections.

^a The commercial square footage includes retail, service, and office square footage. This provides a net increase. The total amount of commercial square footage generated with 2.0 FAR would be 485,195 sf minus existing commercial square footage of 60,111 in the Redevelop category for a net increase of 425,084 square feet.

^b The 2.0 FAR would result in a total of 951 rooms minus the existing 78 rooms for a net increase of 873 rooms.

^c The 2.0 FAR would result in a total of 430 residential units minus the existing 65 residential units for a net increase of 365 residential units.

Source: PCR Services Corporation, 2014

Regarding residential uses, it is assumed that 25 percent of the ground floor of a development would be occupied by commercial uses, with the remainder (or 75 percent) of the square footage developed as units. Assuming that 15 percent of the square footage would be used for common space, and applying an average unit size of 1,600 sf, a net increase of 365 residential units would result.

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RE: FLOOR AREA RATIO ANALYSIS



Table 3, Comparison of Buildout Under Current Regulations and 2.0 FAR, provides a summary comparison of the total increase in commercial square footage, rooms, and residential units under existing regulations and 2.0 FAR within the Study Area. As shown in Table 3, the 2.0 FAR is expected to result in an overall increase in estimated development buildout potential compared to buildout estimated under existing regulations.

Table 3

Comparison of Buildout Under Current Regulations and 2.0 FAR

	Buildout – Current Regulations	Buildout – 2.0 FAR	Change in Buildout Potential (Current Regs vs. 2.0 FAR)
Commercial SF	53,136 sf ^a	485,195 sf	+ 432,059 sf
Lodging (Rooms)	524 to 1,048 rooms ^b	951 rooms	–+427 to 97 rooms
Residential Units	117 units ^c	430 units	+ 313 units

^a The Zoning Code currently allows 2.5 FAR in the commercial districts with a limit on the number of rooms or residential units. While under the current regulations a project could develop 2.5 FAR of commercial floor area, for purposes of this comparison a 0.25 FAR is used as that relates to the level of development assumed in the Town's traffic model.

^b Assumes 40 to 80 rooms/acre; 40 rooms/acre is the base allowable intensity, with up to 80 rooms/acre allowed with the provision of community benefits.

^c Assumes 12 units/acre.

Source: PCR Services Corporation, 2014

With regard to commercial floor area, the 2.0 FAR is estimated to result in:

- Total of 485,195 square feet of commercial floor area
- A net increase of 425,084 square feet of allowable service, retail, and office space (485,195 square feet minus 60,111 existing square feet)
- Assuming 0.25 FAR, the same acreage could result in approximately 53,136 square feet of commercial floor area⁵
- The 2.0 FAR would result in up to approximately 432,059 square feet more than a 0.25 FAR or eight times more square footage.

⁵ Assumption for commercial development varies in some Town studies ranges from 0.25 to 0.50 FAR; in the Town's traffic model the assumption for commercial development is 0.25 FAR.

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With regard to lodging, the 2.0 FAR is estimated to result in:

- Total of 951 rooms using an assumption of 700 square feet per room
- A net increase of 873 rooms (951 rooms minus 78 existing transient units);
- Base allowable intensity under current regulations of 40 rooms/acre would result in 524 rooms; maximum allowable intensity under current regulations of 80 rooms/acre would result in 1,048 rooms
- The 2.0 FAR using the assumptions developed for the FAR Analysis would result in 951 rooms, which would be an increase of up to 427 rooms compared with 40 rooms/acre; however, if all projects were assumed to provide community benefits the 2.0 FAR would result in a number of rooms within what is allowable under the General Plan (951 rooms with a 2.0 FAR compared with 1,048 rooms at 80 rooms/acre);
- The 2.0 FAR results in an estimated 76 rooms per acre

With regard to residential development, the 2.0 FAR could result in:

- Total of 430 units using an assumption of 1,600 square feet per dwelling unit;
- A net increase of approximately 365 residential units (430 units minus 65 existing units);
- Maximum allowable density of 12 units/acre under the current regulations would result in 117 residential units;
- The 2.0 FAR could result in 313 more residential units than the current regulations;
- The 2.0 FAR could result in approximately 43 to 46 units per acre.

Based on the analyses conducted to date and with the assumptions developed for this FAR Analysis, the findings of this evaluation indicate that the Buildout using a 2.0 FAR would exceed the amount of development that would be expected to occur under the General Plan. More specifically, the residential density would be higher than the density that is currently allowed. The 2.0 FAR could result in residential development that is 43 to 46 units per acre. The lodging that could result with a 2.0 FAR could be an increase in intensity when compared with 40 rooms/acre or similar to the intensity of development that is allowed assuming the provision of

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community benefits, which is up to 80 rooms/acre. The commercial square footage that could result with the 2.0 FAR could be up to eight times greater than a 0.25 FAR.

GENERAL PLAN AMENDMENTS

The change in the approach to FAR from a room and unit/acre cap to regulate the amount of development on an individual parcel would require General Plan amendments to remove text associated with rooms and units/acre and to provide the FAR. Amendment of the General Plan would allow the Town to make changes to the General Plan to shift from a PAOT to an impacts-based approach (PIEC). The General Plan also contains a discussion of Build-out and definitions that with the change to FAR would need to be revised. **Table 4, Possible Amendments to the General Plan**, provides the policies and text that would need to be amended in the General Plan for consistency with the FAR approach. Once there is consensus on the approach, the specific changes and language will be developed.

Table 4

Possible Amendments to the General Plan

Policy Number/Page No.	Policy	Suggested Amendment/Discussion
Policy L.1.A. (p.30)	Limit total peak population of permanent and seasonal residents and visitors to 52,000 people.	Revise the policy to address carrying capacity or sustainable growth
Action L.1.A.2 (p. 30)	Prepare an Annual Community Indicators Report to monitor pace of growth and to plan for changing conditions. Potential Community Indicators include: <ul style="list-style-type: none">• Environmental Indicators• Average median income• Unemployment rates• Visitor lodging occupancy• Annual visitors• Downhill skier/snowboarder visits• Cross-country skier visits• Building permits• Real estate sales/average sales price• Retail vacancy• Transient Occupancy Tax revenues• Sales tax revenues• Population	Determine if Project Impact Evaluation Criteria (PIEC) should be included in General Plan

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RE: FLOOR AREA RATIO ANALYSIS



Table 4 (Continued)

Possible Amendments to the General Plan

Policy Number/Page No.	Policy	Suggested Amendment/Discussion
Policy L.3.H. and Action L.3.H.1. (p. 32)	<p>Policy: Density may be clustered or transferred within clearly articulated district, master, and specific plans to enhance General Plan goals and policies. Development rights may also be transferred between districts when that transfer furthers protection of identified environmentally sensitive areas.</p> <p>Action: Prepare a transfer of development rights ordinance describing the methods and findings for approving such density transfers.</p>	Determine if TDR is still appropriate for commercial districts
Policy L.5.G. (p. 32)	<p>In the C-1 and C-2 Designations, density may be increased to no more than twice the density for hotel, motel, and similar transient lodging projects that specifically enhance the tourism, community, and environmental objectives of the Town. This enhancement must be through the provision of amenities, services, and/or environmental benefits above and beyond those required to meet the incremental demands of the project. These amenities, services, and environmental benefits include, but are not limited to those listed under “Community Character” on page 24 of this General Plan. Any such increase shall further the Community Vision, shall be consistent with the discussion of “Build-out” on page 37 of this General Plan, shall be consistent with approved District Plans, and shall be subject to such rules, processes, and findings as may be adopted by the Town Council in its sole discretion.</p>	If remove CBIZ delete policy
p. 35	Land Use Diagram	Revise to correct boundaries of C-1 and C-2 to match Zoning Designations
p. 36	<p>Commercial 1 (C-1) The C-1 designation allows medium-scale, commercial mixed uses. The base density for residential is six (6) to a maximum of twelve (12) residential dwelling units per acre and a maximum of forty (40) hotel rooms per acre. This designation is located along Main Street between the North Village District and Mono Street, and is intended to create a transition</p>	Revise to reflect 2.0 FAR and no density/intensity cap

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RE: FLOOR AREA RATIO ANALYSIS



Table 4 (Continued)

Possible Amendments to the General Plan

Policy Number/Page No.	Policy	Suggested Amendment/Discussion
	zone to the more intensive Commercial 2 and North Village designations. A minimum floor area ratios and amount of commercial uses will be established in the Zoning Code.	
p. 36	Commercial 2 (C-2) The C-2 designation allows for the community’s medium- and large-scale commercial mixed uses. The base density for residential is six (6) to a maximum of twelve (12) residential dwelling units per acre and a maximum of forty (40) hotel rooms per acre. Intended uses include retail and office space for services as well as visitor lodging and residential uses. A minimum floor area ratio and amount of commercial uses will be established in the Zoning Code.	Revise to reflect 2.0 FAR and no density/intensity cap
p. 37	Build-out	Revise discussion to reflect current approach and assumptions regarding build-out
Appendix A: Action Table	Action L.1.A.2 Prepare an Annual Community Indicators Report to monitor pace of growth and to plan for changing conditions. Potential Community Indicators include: <ul style="list-style-type: none"> • Environmental Indicators • Average median income • Unemployment rates • Visitor lodging occupancy • Annual visitors • Downhill skier/snowboarder visits • Cross-country skier visits • Building permits • Real estate sales/average sales price • Retail vacancy • Transient Occupancy Tax revenues • Sales tax revenues • Population 	Determine if PIEC should be used
Appendix A: Action Table	Action L.3.F.1. Study the experiences of other communities in finding fair and equitable standards and formulas for gaining community benefits	If remove CBIZ remove action items

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RE: FLOOR AREA RATIO ANALYSIS



Table 4 (Continued)

Possible Amendments to the General Plan

Policy Number/Page No.	Policy	Suggested Amendment/Discussion
	Action L.3.F.2. Develop formula-based methods and standards for community benefits applicable to projects of a certain size.	
Appendix A: Action Table	Action L.3.H.1. Prepare a transfer of development rights ordinance describing the methods and findings for approving such density transfers.	Determine if necessary
Appendix E: Useful Terms for Understanding the General Plan	Community Benefit People at One Time (PAOT)	Consider deleting Community Benefit; Delete PAOT; consider adding Floor Area Ratio

Instead of the PAOT approach that is currently used, potential impacts from development would be assessed on a project-by-project basis during the PIEC and/or environmental review, including but not limited to air quality, including vehicle miles travelled (VMT); biological resources; cultural resources; geology and soils; hazards; hydrology; land use; noise; public services and utilities, including water demand; and transportation. An impacts-based approach will help ensure that growth in the Town will not exceed the carrying capacity of infrastructure or other constraints, such as VMT and water supply, and that and significant environmental impacts identified will be mitigated to the extent feasible.

DISCUSSION ITEMS AND NEXT STEPS

Input regarding the following is requested:

1. Review and confirm the approach and methodology used to determine Buildout
2. Provide input regarding any of the key assumptions
3. Confirm whether it is reasonable to assume that vacation of the frontage road would occur within the planning period of the General Plan.
4. Direction to proceed with the 2.0 FAR
5. CBIZ. Determine if CBIZ is warranted or if another method is more appropriate in light of the FAR approach.
6. Transfer of Development Rights Ordinance. Determine if a Transfer of Development Rights Ordinance is still necessary. If it is determined that it is not necessary, the General

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RE: FLOOR AREA RATIO ANALYSIS



Plan would be amended to remove Action L.3.H.1, which indicates that the Town should prepare such an ordinance.

Understanding that refinements and/or changes to this analysis based on input received from the Planning and Economic Development Commission may be necessary, the findings of this evaluation indicate that the Buildout using a 2.0 FAR would exceed the amount of development that would be expected to occur under the General Plan. As such, in the event the findings do not materially change, the Town would need to take the following steps, and perhaps others, prior to adoption of a 2.0 FAR for the MLR, D, and OMR zones:

- Comply with the California Environmental Quality Act (CEQA). Prepare an environmental document to evaluate the potential physical impacts that could occur from the implementation of the 2.0 FAR as well as other related changes in the General Plan, Mobility Element or other planning documents.
 - Mobility Element. Determine if any changes are necessary stemming from the FAR Analysis as well as the Main Street Plan. Once any necessary revisions have been made, the Draft Mobility Element will move forward with the General Plan Amendment.
 - District Planning/Main Street Plan Codification. Determine if the Main Street Plan should be adopted.

ACRONYMS

Abbreviation	Description
CBIZ	Community Benefits/Incentive Zoning
C-1	Commercial 1
C-2	Commercial 2
D	Downtown
DNDP	Downtown Neighborhood District Plan
EPS Study	2011 Mammoth Lakes Economic Forecast and Revitalization Strategies
FAR	Floor Area Ratio
FAR Analysis	Floor Area Ratio Analysis
MLR	Mixed Lodging Residential
OMR	Old Mammoth Road
PAOT	People At One Time
PIEC	Project Impact Evaluation Criteria
TDR	Transfer Development Rights
VMT	Vehicle miles travelled
ZCU	Zoning Code Update

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RE: FLOOR AREA RATIO ANALYSIS



Attachments:

A – FAR Research

B – Assumptions

C – Comparison of Hotels

D – Photographs

E – Summary Spreadsheet

A - FAR Research

FAR Research

PCR researched various communities to identify methods used to regulate density/FAR and to determine if there was an applicable model for the Town of Mammoth. PCR identified communities that use an FAR, which included Aspen, Breckenridge, Huntington Beach, Philadelphia, and Santa Monica. Philadelphia was initially identified for study as it was recommended by the American Planning Association (APA) as community that utilized unique approaches to regulating FAR. Huntington Beach was examined as it was Southern California community with a mixed-use, pedestrian-oriented downtown.

After preliminary research, it was determined that the communities of Aspen, Santa Monica, and Breckenridge had the most applicable regulatory models for regulating FAR. These communities were chosen for follow-up interviews for the following reasons:

- The City of Aspen, City of Santa Monica, and Town of Breckenridge are communities with substantial non-permanent (tourist/visitor) populations. Aspen and Breckenridge are also ski resort communities. Santa Monica, while on the coast, has a large amount of tourists/seasonal visitors and numerous environmental constraints (water quality, views, coastal access).
- All of the communities have challenges to the provision of affordable housing and need for providing hotels/lodging.
- Each development code had unique approaches to regulating density (sliding scale for FARs, bonus FARs for certain uses)
- Density levels were in a range similar to Mammoth Lakes (i.e. they were not extremely dense urban areas/cities)
- Each community had a distinct downtown area that included mixed-use development (not suburban).

PCR then conducted interviews with planning staff at Aspen, Santa Monica, Breckenridge, and Pasadena to discuss the effectiveness of the regulatory approaches used to regulate density, potential pros and cons relative to the regulations, and any recommendations for implementation. We also discussed the approach to buildout projections with some of the planners. While Huntington Beach and Philadelphia were not chosen for follow-up interviews, a summary of the regulations within these communities is provided in the Comparison Matrix.

Summary of Interviews and Recommendations

Breckenridge

The Town of Breckenridge has a development code which is a combination of traditional zoning and performance zoning. A proposed project is reviewed against its potential impacts using a point system (potential physical, social, aesthetic and historic impacts all have points). The code is further distinguished from traditional zoning in its ability to be flexible without relying on a variance procedure. For example, a structure's proper placement or height is determined only after an analysis of its potential impact on neighboring properties and the community as a whole. A project must be approved

by the Town when it implements or has no effect on all of the absolute policies and when it receives a positive score (0 or above) in the point analysis for the relative policies.

- The Town's development code has generally been accepted and used in the community successfully. It has been added to or modified over the years to incorporate 'best practices' or changing community needs.
- Although in theory, no project with negative points can be approved, the City Council has on occasion, approved significant projects that have a negative point valuation through development agreements. This is generally rare, and only occurs if a project would be providing a substantial community benefit. For example, a project would protect a significant habitat area or would create a use that would benefit the community as a whole, such as a hospital.
- Besides development regulations, development has largely kept in line with what the Town has envisioned because the Town has an historic downtown core, with small lots and a traditional pedestrian-oriented layout. Projects tend to be smaller, infill development.
- The Town has also established a historic district, design standards, and design criteria with the development code which seeks to preserve the historic flavor and architecture of the Town.
- Being a blended development code system, there can be a learning curve for applicants that are not familiar with the Code.

Aspen

The City of Aspen uses an FAR limit as the primary control over the size of the project in addition to height limits. The City also requires unit size cap of 1,500 square feet/unit for lodging uses. Bonus FARs can be provided for certain type of land use uses, but uses cannot go over the cumulative FAR cap for a project site.

- The City of Aspen believes that providing bonus FARs for "preferred projects" (lodging, affordable housing, commercial, and civic uses) as a component of an overall cumulative FAR cap has been a successful tool to encourage certain type of uses in targeted areas of the City. Without the bonus FAR, many affordable housing units and smaller lodging facilities would not have been developed.
- Height limits in addition to FAR are important to reduce scale, particularly in the downtown mixed use area.
- Aspen also has a number of adopted view planes that were identified as important views from town in the 1970s. If a building is going to encroach into these areas, a heightened review is required.
- The City is currently working on a *Lodging Preservation Ordinance*. The Ordinance will provide incentives for new, smaller lodging developments (such as greater FAR) and other incentives for retaining or renovating existing lodging.

Santa Monica

The City of Santa Monica uses an FAR limit with a sliding scale tied to the lot size. In addition, the FAR is increased with 30 percent of a project is residential and in some areas if 80 percent of the project is a grocery store. The Town also has a height limit.

- The City recently updated the Land Use and Circulation Element (LUCE) for the City. The LUCE focuses growth in certain areas.
- FAR can translate into many different building forms. Need to understand the form that is desired in a community.
- The City is finding that the allowable FARs put in place of 4.0 and 3.0 are too high. Even a 2.5 in terms of what the community will accept is proving to be high.
- The City identified Opportunity Sites in the Downtown area, which are sites that are considered exceptional due to location, size, and ability to shape the Downtown. These sites are allowed a greater intensity of development with the provision of community benefits.
- City uses Development Agreements (DA), which provide tremendous flexibility but does not create certainty.

Pasadena

The City of Pasadena is in the process of updating the General Plan. The City has residential units/acre and the commercial and mixed use areas have FAR only. The City is debating whether to continue with FAR or dwelling units per acre (units/acre).

With regard to forecasting buildout, the City first dealt with it in 1994 when they did the first comprehensive update. The current update is a result of approaching development caps in the Central District. General Plan modeling and full buildout projections resulted in numbers that were so high it was laughable. Therefore, the City looked at SCAG forecasts, economic forecasts and historical development trends over the last 15 years. The methodology has varies for the different areas.

The City has a range of FAR, with the highest being 3.0 FAR with 6 story height limit; the most common mixed use FAR is 2.25 FAR; and in some locations it is 1.0 FAR.

City or Town	Zone	Maximum FAR	Min. FAR	Height	Setbacks
Breckenridge, CO	The Breckenridge Code is combination between traditional and performance zoning. Development code consists of policies/standards (which must be met for approval) and "relative policies." Applicants must earn enough points for complying with the set of relative policies to gain project approval.	<p>Density</p> <p>It is the intention of the town to limit the total intensity of development by limiting the maximum allowed square footage of each project. Commercial, office, and certain residential uses' densities are designated within the land use guidelines in terms of a FAR. The town requires dwelling units to be converted to square footage rather than units because the town has determined that the impacts of a development are more closely related to the total square footage of the project than the number of units. For example:</p> <p>Conservation District:</p> <p>Single Family, duplexes and townhomes 1 unit =1,600 square feet Condominiums or boarding houses: 1 unit = 900 square feet All other residential (included bed and breakfast): 1 unit = 1,200 square feet</p> <p>Outside Conservation District:</p> <p>Single-family: 1 unit = unlimited square footage Duplex included within site plan level development permit with net density of less than 5 units per acre : 1 unit = unlimited square footage Duplex included within site plan level development permit with net density of 5 units per acre or more 1 unit = 1,600 square feet Townhouse: 1 unit = 1,600 square feet Hotel, inn, motel, bed and breakfast: 1 unit = 1,380 square feet Condominiums or boarding houses:1 unit = 900 square feet</p> <p>-----</p> <p>FAR</p> <p>FAR limits vary by Land Use District in the Town. The Town is divided into 52 Land Use Districts based upon current and desired uses and character. For each individual district, the Land Use Guidelines establish general parameters for land uses, desired architectural character, building heights, FAR and so on.</p> <p>E.g. District 18 (Defined as part of the Central Business Area and a Mixed-Use Area) Residential (Single Family or Duplex) Intensity of Use: 12 UPA Commercial: 1:3 FAR</p> <p>District 18-2 (Defined as part of the Historic District and a Mixed Use Area) Residential: (Single Family, Duplex, Townhome, Multi-Family): 20 UPA Commercial: 1:1 FAR</p> <p>District 2 (Low Density Forested Area Outside of Town) Residential (Single Family and Duplex): 2 UPA No Commercial</p>	None	<p><i>Within The Historic District:</i> Maximum building height for all nonresidential, multi-family, duplex and single-family structures:</p> <p>a. In land use districts 11, 17 and 18, and in those portions of land use districts 18-2 and 19 north of Lincoln Avenue or south of Washington Street: twenty-six feet (26 ft).</p> <p>b. In those portions of land use districts 18-2 and 19 that lie between Lincoln Avenue and Washington Street: thirty feet (30 ft).</p> <p><i>Outside The Historic District:</i> 1) For all single-family residences or duplex units: Measurement shall be to the highest point of any roof element: thirty five feet (35 ft). 2) For all structures except single-family and duplex units outside the historic district: No building shall exceed the land use guidelines recommendation by more than two full stories.</p>	<p>Within The Conservation District (All Residential Development):</p> <p>Front Yard: Fifteen feet (15'). #1 Side Yard: Five feet (5'). Rear Yard: Fifteen feet (15')</p> <p>Outside The Conservation District:</p> <p>a. Single-Family Development: Front yard: Twenty five feet (25'). Combined side yard: Fifty feet (50') (total of both side yards). Rear yard: Fifteen feet (15'). (Ord. 14, Series 2003)</p> <p>b. Other Residential Development: Front yard: Fifteen feet (15'). Side yard: Five feet (5'). Rear yard: Fifteen feet (15').</p>
Aspen	Commercial (C1) Permits commercial uses on the ground floor, affordable residential housing, lodging, and vacation rentals of residential dwelling units.	FAR schedule applies to uses cumulatively up to a total maximum FAR of 2.5:1 . a. Commercial uses: 1.5:1. b. Arts, cultural and civic uses, and public uses: 2.5:1. c. Affordable housing: No limitation. d. Lodging: 0.5:1, (may be increased to 2:1 if the individual lodge units on the parcel average 500 net livable square feet or less) e. Bed and breakfast: 80% of allowable floor area of a same-sized lot located in the R-6	None	South side of a Street: 28 ft. for two-story elements of a building North side of a Street: 28 ft. for two-story elements of a building. 36 ft. for three-story elements of a building; may be increased to 38 feet through design review.	Minimum front yard setback (feet): a. Bed and breakfast: Same as R-6 Zone District. b. All other uses: No requirement. Minimum side yard setback a. Bed and breakfast: Same as R-

City or Town	Zone	Maximum FAR	Min. FAR	Height	Setbacks
Aspen used to permit market rate housing in C1 and then modified it to affordable housing only. Market rate residential is permitted in MU and CC districts.		<p>Zone District.</p> <p>Note: Maximum lodge unit size (square feet): 1,500.</p>			<p>6 Zone District.</p> <p>b. All other uses: No requirement.</p> <p>Minimum rear yard setback</p> <p>a. Bed and breakfast: Same as R-6 Zone District.</p> <p>b. All other uses: No requirement.</p>
	Commercial Core (CC) Permits retail, office, lodging, affordable housing, free-market housing, and short term vacation rental uses. Retail and restaurant uses are appropriate for ground floors of buildings while residential and office uses are not permitted on ground floors.	<p>Floor area ratio (FAR): The following FAR schedule applies to uses cumulatively up to a total maximum FAR of 2.75:1.</p> <p>a. Commercial uses: 2:1.</p> <p>b. Arts, cultural and civic uses, public uses, recreational uses, academic uses, child -care center and similar uses: 2.75:1.</p> <p>c. Affordable multi-family housing: No limitation.</p> <p>d. Lodging: 0.5:1, which may be increased to 2.5:1 if the individual lodge units on the parcel average five hundred (500) net livable square feet or less, which may be comprised of lock-off units.</p> <p>Maximum lodge unit size (square feet): 1,500.</p>	None	<p>South side of a Street: 28 ft. for two-story elements of a building.</p> <p>North side of a Street: 28 ft. for two-story elements of a building. 38 ft. for three-story elements of a building; may be increased to 40 feet through design review.</p>	<p>Minimum front yard setback: No requirement.</p> <p>Minimum side yard setback: No requirement.</p> <p>Minimum rear yard setback: No requirement</p>
	Mixed-Use (MU) Permits lodging, short term vacation rentals, multi-family, single-family and mixed-use buildings with commercial uses.	<p>FAR schedule applies to uses cumulatively up to a total maximum FAR of 2:1. For properties within the Main Street Historic District, this maximum cumulative FAR shall be 1:1, which may be increased to 1.25:1 by special review.</p> <p>1) Commercial; lodge; timeshare lodge, exempt timesharing; arts, cultural and civic uses; public uses; recreational uses; academic uses: 0.75:1, which may be increased to 1:1 by special review.</p> <p>2) Affordable multi-family housing: No limitation other than the cumulative FAR limit stated above.</p> <p>3) Free-market, multi-family housing: 0.5:1, which may be increased to 0.75:1 if affordable housing floor area equal to 100% of the free-market residential floor area is developed on the same parcel.</p> <p><i>Commercial/residential ratio:</i> The total free-market residential net livable area shall be no greater than 150% the total floor area associated with the uses described above located on the same parcel.</p>	None	<p>Commercial, Lodge, Timeshare Lodge, Exempt Timesharing, Multi-Family and Mixed-Use Buildings: 28 ft, which may be increased to 32 ft through Commercial Design Review.</p> <p>Detached residential and duplex dwellings: 25 feet</p>	<p>Minimum front yard setback: 10 ft., which may be reduced to 5 ft., pursuant to Special Review</p> <p>Minimum side yard setback: 5 ft.</p> <p>Minimum rear yard setback: 5 ft.</p>

City or Town	Zone	Maximum FAR	Min. FAR	Height	Setbacks																																															
Santa Monica	The current Zoning Code does not prescribe residential densities within the commercial districts, and instead regulates building intensities through floor area and height. The maximum building height varies from 30 feet in the C2 zone to 45 feet in the C3, C5, and C6 districts. There are no minimum rear and side yard setback requirements, except where the rear parcel line or interior side parcel line abuts a residential district.	<p>Depends on project components and area within the City. Example for a project on Montana Avenue for non-preferred Project:</p> <table border="1"> <thead> <tr> <th>Parcel Square Footage</th> <th>FAR</th> <th>FAR if at Least 30% of Project is Residential</th> </tr> </thead> <tbody> <tr> <td>0—7,500</td> <td>0.60</td> <td>0.75</td> </tr> <tr> <td>7,501—15,000</td> <td>0.40</td> <td>0.75</td> </tr> <tr> <td>15,001—22,500</td> <td>0.35</td> <td>0.65</td> </tr> <tr> <td>22,501 and up</td> <td>0.25</td> <td>0.55</td> </tr> </tbody> </table> <p>Greater FAR is permitted for preferred projects. Example below for a preferred Project:**</p> <table border="1"> <thead> <tr> <th>Parcel Square Footage</th> <th>FAR</th> <th>FAR if at Least 30% of Project is Residential, or if at Least 80% is a Grocery Store</th> </tr> </thead> <tbody> <tr> <td>0—7,500</td> <td>0.75</td> <td>0.75</td> </tr> <tr> <td>7,501—15,000</td> <td>0.50</td> <td>0.75</td> </tr> <tr> <td>15,001—22,500</td> <td>0.45</td> <td>0.65</td> </tr> <tr> <td>22,501 and up</td> <td>0.40</td> <td>0.55</td> </tr> </tbody> </table>	Parcel Square Footage	FAR	FAR if at Least 30% of Project is Residential	0—7,500	0.60	0.75	7,501—15,000	0.40	0.75	15,001—22,500	0.35	0.65	22,501 and up	0.25	0.55	Parcel Square Footage	FAR	FAR if at Least 30% of Project is Residential, or if at Least 80% is a Grocery Store	0—7,500	0.75	0.75	7,501—15,000	0.50	0.75	15,001—22,500	0.45	0.65	22,501 and up	0.40	0.55	None	30 ft-45 ft.	<p>Rear Yard Setback. None, except: Where rear parcel line abuts a residential district, a rear yard equal to:</p> <p style="text-align: center;">$5' + \frac{(\text{stories} \times \text{lot width})}{50'}$</p> <p>Side Yard Setback. None, except:</p> <p>Where the interior side parcel line abuts a residential district, an interior side yard equal to:</p> <p style="text-align: center;">$5' + \frac{(\text{stories} \times \text{lot width})}{50'}$</p>																	
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Philadelphia	CM Districts Extensive FAR and height bonus program. Could not see a density limit for residential uses in mixed use zones.	<p>Max Floor Area: CMX-3/CMX-4: (500% of lot area) CM-5: (1,200%) RMX (250 of district area, excluding streets)</p> <p>Floor Area Bonus Program:</p> <table border="1"> <thead> <tr> <th rowspan="2">Bonus Category</th> <th colspan="4">Additional Gross Floor Area, as Percent of Lot Area</th> </tr> <tr> <th>RMX-3</th> <th>CMX-3 in /TOD Districts</th> <th>CMX-4</th> <th>CMX-5</th> </tr> </thead> <tbody> <tr> <td>Public Art</td> <td>N/A</td> <td>N/A</td> <td>50%</td> <td>100%</td> </tr> <tr> <td>Public Space</td> <td>N/A</td> <td>N/A</td> <td>Up to 200%</td> <td>Up to 400%</td> </tr> <tr> <td>Mixed Income Housing</td> <td>N/A</td> <td>150%</td> <td>150%</td> <td>300%</td> </tr> <tr> <td>Transit Improvements</td> <td>N/A</td> <td>N/A</td> <td>Up to 200%</td> <td>Up to 400%</td> </tr> </tbody> </table>	Bonus Category	Additional Gross Floor Area, as Percent of Lot Area				RMX-3	CMX-3 in /TOD Districts	CMX-4	CMX-5	Public Art	N/A	N/A	50%	100%	Public Space	N/A	N/A	Up to 200%	Up to 400%	Mixed Income Housing	N/A	150%	150%	300%	Transit Improvements	N/A	N/A	Up to 200%	Up to 400%	None	<p>CMX-2; CA-1; CA-2: 38 ft. CMX-2.5: 55 ft. CMX-3/CMX-4/CM-5/ RMX-3: None</p> <p>Height Bonus Program:</p> <table border="1"> <thead> <tr> <th>Bonus Category</th> <th>Additional Building Height</th> </tr> </thead> <tbody> <tr> <td>Public Art</td> <td>Up to 12 ft.</td> </tr> <tr> <td>Public Space</td> <td>Up to 24 ft.</td> </tr> <tr> <td>Mixed Income Housing</td> <td>Up to 48 ft.</td> </tr> <tr> <td>Transit Improvements</td> <td>Up to 72 ft.</td> </tr> <tr> <td>Green Building</td> <td>Up to 36 ft.</td> </tr> <tr> <td>Trail</td> <td>Up to 72 ft.</td> </tr> <tr> <td>Street Extension</td> <td>Up to 72 ft.</td> </tr> <tr> <td>Retail Space</td> <td>Up to 48 ft.</td> </tr> </tbody> </table>	Bonus Category	Additional Building Height	Public Art	Up to 12 ft.	Public Space	Up to 24 ft.	Mixed Income Housing	Up to 48 ft.	Transit Improvements	Up to 72 ft.	Green Building	Up to 36 ft.	Trail	Up to 72 ft.	Street Extension	Up to 72 ft.	Retail Space	Up to 48 ft.	<p>Front Yard: CMX-2; CMX-4;CMX-5,CA-1;CA-2; RMX-3: None CMX-2.5: Must be built to front lot line</p> <p>Side Yard: CMX-2/CMX-2.5/CA-1: 5 ft. CMX-3: 8 ft. if used for buildings with residential CMX-4/CMX-5: Buildings <= 4 ft. stories with three or fewer dwelling units = 5ft.; Others = 8 ft. CA-2: None</p> <p>Rear Yard: CMX-2/CMX-2.5: the greater of 9 ft. or 10% of lot depth CA-1: 5 ft.</p>
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City or Town	Zone	Maximum FAR					Min. FAR	Height	Setbacks
		Underground Accessory Parking and Loading	100%	N/A	100%	200%			CMX-3/ CMX-4/CMX-5: None
		Green Building	N/A	Up to 100%	Up to 200%	Up to 400%			
Huntington Beach	<p>MU-TC (Mixed-Use Transit Oriented District) was folded into the Beach-Edinger Specific Plan.</p> <p>The Plan's form-based zoning does not include prescriptive density or Floor Area Ratio (FAR) caps, but instead regulates development based on building form and scale. Building heights of four to six stories are permitted in most areas, with mixed use projects eligible for reductions in parking. Certain locations within the Specific Plan require residential development to include ground floor commercial use, while other areas permit stand-alone multi-family residential without a commercial component.</p>	None				None	Four to six stories depending on location	<p>Towne Center:</p> <p>Front Yard Setback minimum / maximum - Edinger 0 ft / 5 ft minimum / maximum - Main 0 ft / 5 ft minimum / maximum - all other streets 0 ft / 5 ft; L4: 5/15 ft</p> <p>Side Yard Setback min w/ living space windows 10 ft min w/out living space windows 0 ft</p> <p>Rear Yard Setback minimum 5 ft</p> <p>Alley Setback minimum 5 ft</p> <p>Frontage Coverage minimum - Edinger/Beach/Main 90% minimum - all other streets 75%</p> <p>Space Between Buildings minimum 20 ft</p> <p>Build-to-Corner required or not required</p>	
<p>**Santa Monica: Preferred permitted projects include: 100% affordable housing projects; projects that include the retention and preservation of a historic structure; child day care centers; congregate housing; domestic violence shelters; homeless shelters with less than 55 beds; market rate apartment and condominium buildings where 25% of the residential units are three-bedroom or larger, 66% of the remaining residential units are two bedrooms or larger, and the project receives a LEED rating of silver or higher level; mixed use commercial-residential projects where at least 90% of the floor area at the second floor and above is dedicated toward residential uses, 25% of the residential units are three-bedroom or larger, 66% of the remaining residential units are two bedrooms or larger, and the project receives a LEED rating of silver or higher level; places of worship; senior group housing; senior housing; and transitional housing.</p>									

Town of Breckenridge Development Code

Discussion with Julia Puester, Senior Planner, Town of Breckenridge

April 29, 2014

The Town of Breckenridge has a highly unique development code which is a combination of traditional zoning and performance zoning. Unlike traditional zoning, it reviews a proposed project against its potential impacts, rather than against a strict set of standards and criteria, considering not only the proposed project's physical impacts, but also its social, aesthetic and historic impacts as well. The code is further distinguished from traditional zoning in its ability to be flexible without relying on the variance procedure. For example, a structure's proper placement or height is determined only after an analysis of its potential impact on neighboring properties and the community as a whole.

The development code is the core of a three (3) document system used by the Town to review projects and analyze growth. 1) the comprehensive plan, guides growth in a general way; 2) the land use guidance system, establishes forty two (42) districts and sets out general parameters for land uses including general density guidance, land uses, and desired architectural character; and 3) the development code.

The development code consists of a set of Town policies covering a range of subjects (e.g. air and water quality, historic districts, employee housing). Like traditional zoning, however, the code does set minimum standards that must be met before a development permit is granted.

The development code policies are divided into two (2) types - "absolute policies" (of major importance) and "relative policies" (of lesser importance) - and the development code analyzes projects according to how well they meet the criteria and from that assign a point based system that includes negative points and positive points. The point analysis is the quantitative backbone of the development code system. In addition, a multiplier of 1 to 5 is associated with each relative policy, depending on its importance to the town.

For example, each relative policy is assigned points for the applicant's performance, as follows:

+ 2 (or greater)	Awarded for providing a significant public benefit with no substantial public detriment, or for an excellent job of implementation. The more the public benefit without substantial public detriment or the better the job of implementation, the more the award of positive points.
+1	Awarded for providing some public benefits, mitigating a minor public detriment, or for doing a good job on implementation.
0	Awarded if the policy is irrelevant, if there is no public benefit and no detriment from the project, if there is a public detriment which has been fully mitigated, or for an adequate job of implementation.
-1	Assessed for an inadequate job of implementation or for producing some public detriment
-2/-3 (or greater)	Assessed for substantially no effort at implementation or for an unmitigated significant public detriment. The less the effort at greater implementation, or the greater the degree of unmitigated significant public detriment, the greater the assessment of negative points.

A project must be approved by the Town when it implements or has no effect on all of the absolute policies and when it receives a positive score (0 or above) in the point analysis for the relative policies.

The development code requires dwelling units to be converted to square footage rather than units because the town has determined that the impacts of a development are more closely related to the total square footage of the project than the number of units. E.g. 1 unit = 1,600 square feet .

Ms. Puester indicated that the unique development code has been put in place since the 1990s and generally has been accepted and used in the community successfully. It has been added to or modified over the years to incorporate 'best practices' or changing community needs. For example, the development code was amended recently to include energy conservation measures and landscaping plans into the 'positive' point areas in order to encourage these types of uses.

Although in theory no project with negative points can be approved, the City Council has on occasion, approved significant projects that have a negative point valuation through development agreements. This is generally rare, and only occurs if a project would be providing a substantial community benefit. For example, a project would protect a significant habitat area or would create a use that would benefit the community as a whole, such as a hospital.

Besides the regulations contained within the development code and other planning documents, Ms. Puester believes that development has largely keep in line with what the Town has envisioned because the Town has an historic downtown core, with small lots and a traditional pedestrian-oriented layout. Development is largely infill and because of the smaller parcel size, the Town does generally not see applications for large development such as a big box retailer. In addition, the Town has an established a historic district, design standards, and design criteria with the development code which seeks to preserve the historic flavor and architecture of the Town.

City of Aspen Development Code

Discussion with Jessica Garrow, Long Range Planner, City of Aspen.

April 7, 2014 and follow-up April 25, 2014.

The City of Aspen’s Zoning Code includes density limits for lower-density residential districts (single-family and duplex districts), but does not include density limits for more intense residential, commercial and mixed-use districts, which rely on FAR as a primary control over the size of the project. The City also provides additional FAR for certain uses to encourage “preferred projects” which for the City of Aspen includes lodging, affordable housing, commercial, and civic uses. However, these uses must be components of an overall cumulative ‘cap’. The use of FAR and bonus FAR incentives was adopted in 2007, in response to market rate housing being developed in large numbers, eclipsing or creating a ‘chilling effect’ on other uses.

FAR use in the Aspen Zoning Code
<p>C1 District</p> <p>The FAR schedule applies to uses cumulatively up to a total maximum FAR of 2.5:1.</p> <ul style="list-style-type: none"> a. Commercial uses: 1.5:1. b. Arts, cultural and civic uses, and public uses: 2.5:1. c. Affordable housing: No limitation. d. Lodging: 5:1,(may be increased to 2:1 if the individual lodge units on the parcel average 500 net livable square feet or less) e. Bed and breakfast: 80% of allowable floor area of a same-sized lot located in the R-6 Zone District. <p>Note: Maximum lodge unit size (square feet): 1,500.</p> <p>Height: South side of a Street: 28 ft. for two-story elements of a building</p> <p>North side of a Street: 28 ft. for two-story elements of a building. 36 ft. for three-story elements of a building; may be increased to 38 feet through design review.</p>
<p>Commercial Core (CC)</p> <p>Floor area ratio (FAR): The following FAR schedule applies to uses cumulatively up to a total maximum FAR of 2.75:1.</p> <ul style="list-style-type: none"> a. Commercial uses: 2:1. b. Arts, cultural and civic uses, public uses, recreational uses, academic uses, child -care center and similar uses: 2.75:1. c. Affordable multi-family housing: No limitation. d. Lodging: 0.5:1, which may be increased to 2.5:1 if the individual lodge units on the parcel average five hundred (500) net livable square feet or less, which may be comprised of lock-off units. <p>Maximum lodge unit size (square feet): 1,500.</p> <p>Height: South side of a Street: 28 ft. for two-story elements of a building North side of a Street: 28 ft. for two-story elements of a building. 38 ft. for three-story elements of a building; may be increased to 40 feet through design review.</p>

Mixed Use (MU) District

FAR schedule applies to uses cumulatively up to a total maximum **FAR of 2:1**.

For properties within the Main Street Historic District, this maximum cumulative FAR shall be 1:1, which may be increased to 1.25:1 by special review.

- 1) Commercial; lodge; timeshare lodge, exempt timesharing; arts, cultural and civic uses; public uses; recreational uses; academic uses: .75:1, which may be increased to 1:1 by special review.
- 2) Affordable multi-family housing: No limitation other than the cumulative FAR limit stated above.
- 3) Free-market, multi-family housing: 0.5:1, which may be increased to 0.75:1 if affordable housing floor area equal to 100% of the free-market residential floor area is developed on the same parcel.

Commercial/residential ratio: The total free-market residential net livable area shall be no greater than 150% the total floor area associated with the uses described above located on the same parcel.

Height:

Commercial, Lodge, Timeshare Lodge, Exempt Timesharing, Multi-Family and Mixed-Use Buildings: 28 ft, which may be increased to 32 ft through Commercial Design Review.

Detached residential and duplex dwellings: 25 feet

The City also adopted a unit size cap of 1,500 square feet for lodging to try and encourage denser development/more affordable lodging. Parking is not included in the FAR calculations.

The Code's flexible FAR system has helped create additional uses (lodging, affordable housing) and overall, more diverse projects that would have otherwise not been developed. According to Ms. Garrow, the FAR regulations and Commercial Design Guidelines have done a decent job of regulating mass and scale.

Recent trends that the City had observed are a proliferation of free-market residential uses in the CC and C-1 zones that were starting to have a sterilizing effect on commercial uses. People with enough money to buy an entire building and leave the commercial space vacant, or folks buying downtown and complaining about noise coming from neighboring restaurants, for instance. That led the City to remove free-market residential uses from the CC and C-1 zones in March 2013. Currently only affordable housing is permitted. In addition, the Aspen City Council in 2012-2013 was concerned about the heights allowed in the downtown area, which is why the allowable heights were also reduced in 2013 for the CC and C-1 zones (prior to the new 28-foot limit for 2 story buildings, heights up to 38 feet were allowed by right to developers).

Other than those two issues, the City hasn't had any substantive changes to zoning since they moved to FAR and unit size caps to regulate density, the commercial/residential ratio, etc.

Mass and scale is also regulated, to a certain extent, by the Mountain View Plane regulations. Aspen has a number of adopted view planes that were identified as important views from town in the 1970s. If a building is going to encroach into these areas, a heightened review is required.

The City has various review processes to go through for development. The Aspen Environmental Health department regulates the trash areas. Trash and utility requirements are contained in the Commercial Design Standards, which can be amended through section 12.06 or Special Review. The City has implemented a new system for regulating trip generation through Transportation Demand Management and Multi-Modal Level of Service techniques.

Encouraging and preserving lodging is another emerging issue for Aspen, as some smaller, older lodging has begun to disappear and be redeveloped into other, more lucrative uses. The City is currently working on a *Lodging Preservation Ordinance*. The Ordinance will provide incentives for new, smaller lodging developments (such as greater FAR) and other incentives for retaining or renovating existing lodging.

City of Santa Monica

Discussion with Jing Yeo, Senior Planner, City of Santa Monica

May 20, 2014

The City recently updated the Land Use and Circulation Element (LUCE) for the City. It includes residential and commercial areas and looks at focusing growth. The City applied a set of assumptions for buildout.

Step 1 was to identify areas that would have changes over the life of the General Plan. The City used a couple of tools to identify where development would likely occur and the amount of redevelopment. One tool was the assessed value/land value (AV ratio) – is the land more valuable than the improvements. If this is > 1.0 then the land would likely redevelop. The City developed a relative ratio of FAR – looking at what is developed now compared with what is allowed under current code. If this is ≥ 2.0 or more than the land would likely redevelop.

You need staff input to help come up with a net new number. Generally, Santa Monica did not do the analysis at the parcel level, except for in a few key areas. In some places they assumed an ambient growth factor of 1 or 2%. For hotel development it is based on square footage, not on number of rooms. This meant that Santa Monica did not have to assume a sf/room to quantify number of rooms. An economist was involved and provided population and employment numbers.

The City is finding that the allowable FARs put in place of 4.0 and 3.0 are too high. Even a 2.5 in terms of what the community will accept is proving to be high. FAR can translate into many different building forms. Need to consider the form that is desired in a community.

Concept of Opportunity Sites was born in LUCE work. These are sites that are considered exceptional due to location, size, and ability to shape the Downtown. These sites are allowed a greater intensity of development with the provision of community benefits. The City was considering heights of 120-130 feet, but recently got direction from Council for 84 feet.

In Downtown they are finding that developers are using the exemption in CEQA for infill residential development. The City is getting a lot of residential in the Downtown since this exemption is good for 5 years after the adoption of the LUCE.

City works with Development Agreements (DA). Right now everything in the Downtown requires a DA. There are pros and cons to working with the DA. The DA provides tremendous flexibility for benefits but it does not create certainty. The City looked at a point menu system for benefits. With this system you need to identify priorities and then an equivalency for the increase in FAR. For the City a key priority is affordable housing. The City of Santa Monica is not doing the point system, but rather an increase in fees and affordable housing. Jurisdictions using the point system include Berkeley, Seattle, and Portland.

City of Pasadena

Discussion with Scott Reimers, Planner, City of Pasadena

August 29, 2014

The City of Pasadena is in the process of updating the General Plan. The Land Use diagram has residential units/acre and the commercial and mixed use areas have FAR only. Many Specific Plans have units/acre. The City may modify these after the General Plan is adopted. The City is working with PlaceWorks and doing a form based code update. They are debating whether to continue with FAR or dwelling units per acre (units/acre).

With regard to forecasting buildout, the City first dealt with it in 1994 when they did the first comprehensive update. They now have a cap but the 1994 predates the use of caps. Since 1994 the City has adopted a cap for each Specific Plan. The Central District is getting close to the cap and that is what prompted the work that is underway. When they did General Plan modeling and full buildout projections the numbers were so high it was laughable. The City looked at SCAG forecasts, economic forecasts and what was built in the last 15 years to come up with new numbers. The General Plan horizon year is 2035. The methodology has varies. In the Central District, which is about 800 acres, they compared with other numbers (forecasts and historical development) and came up with projected growth. In East Pasadena, which is a smaller area with bigger properties they did a parcel by parcel approach.

Scott indicated that in working with SCAG projections one needs to consider what is used. SCAG starts with every City's General Plan and then makes some adjustments. If the policies being considered by a jurisdiction would change the growth, then using the projections may not work.

We discussed various levels of FAR. About half way through the process, the City of Pasadena had a City of Los Angeles staff person there to talk about FAR. The highest Pasadena has is 3.0 FAR with 6 story height limit. Downtown Los Angeles has 6.0 FAR. In Pasadena the most common mixed use FAR is 2.25 FAR. In some locations it is 1.0 FAR. Scott indicated that the consultants said that to get vertical integration of uses need a minimum of 1.5 FAR and 3 stories.

Residents of Pasadena want to get rid of FAR. Scott also raised the issue of if there is no unit/acre then there can be issues with Housing Element Updates. He heard that the City or County of Ventura ran into problems with the Housing Element Update since they did not have a unit/acre to work from and rather were using FAR. The jurisdiction had to demonstrate to HCD that based on the form, and average of x units/acre could be achieved.

B - Assumptions

MAMMOTH LAKES

Floor Area Ratio Analysis

ASSUMPTIONS FOR BUILDOUT

The following provides a summary of the steps taken in the process to determine the potential buildout that could occur using floor area ratio (FAR).

Step 1: PCR conducted a detailed land use inventory of the approximately 122-acre study area. Each property in the study area was assessed in the field. Field photographs and notes were taken. In addition, aerials and google earth were used. Data was provided from the County/Town's GIS database for the parcel size and existing development, where available.

Step 2: Based on the land use inventory and discussions with Town staff, Commissioners, and property owners, as well as review of relevant Town documents (General Plan, Main Street Plan, North Old Mammoth Road District Plan), the parcels within the study area were categorized as follows:

- No Change – Lands that are developed and on which there would likely be no sizeable redevelopment during the General Plan timeframe; generally, residential condominium developments were included in this category as they have enough useful life and the likelihood of all of the owners deciding to redevelop the property would be low.
- Develop – Lands that are currently vacant and therefore have a high probability of developing during the General Plan timeframe.
- Redevelop – Lands that are substantially underutilized where existing development would likely be demolished and the property redeveloped during the General Plan timeframe.
- Intensify – Lands that are underutilized but the existing development would likely remain and additional square footage would be developed on the property during the General Plan timeframe.
- Approved – Properties where an approval has been granted by the Town or where an application is pending.

Step 3: The next step was to determine the potential future use for each parcel in the Develop, Redevelop, and Intensify categories. Key assumptions include the following:

- Most development would be mixed use (i.e., retail or service uses on the ground floor with office, lodging, or residential above)
- Main Street – western end more of transition area with more residential
- Concentration of retail/service/lodging along Main Street and
- Mix of uses on Old Mammoth Road

Step 4¹: Assuming a 2.0 FAR, potential square footage was calculated for each of the potential uses:

- Parcel acreage is converted to square feet. The parcel square footage is multiplied by 2.0 to obtain the square footage that could occur on the parcel.
- The total allowable square footage was divided by four to determine amount of ground floor square footage. Given that retail and service uses would likely occupy a portion of the first floor and given current development, the first floor would likely be about 14 feet floor to ceiling for nonresidential uses. Thus, it is assumed that buildings would likely be four stories. While this is used as an assumption, it does not alter the square footage that could occur with the 2.0 FAR. (Note that Table 17.24.030-3 of the Draft Zoning Code indicates maximum building heights are 45 ft. in OMR and 55 ft. in DT; Graphic seems to imply 3 stories for OMR and MLR and 4 stories for DT.)
- The total square footage was divided by 4 to determine the ground floor square footage.
- For commercial/residential or commercial/lodging parcels, it is assumed that commercial space would occupy 25% of the ground floor and that the remaining 75% would go towards the rooms or residential units. The upper 3 floors would be residential or lodging space. Based on these assumptions, approximately 6% of the floor area would be commercial and 94% of the floor area would be used for units or rooms.
- Using the size of one story, that number was multiplied by 0.25 to determine the amount of commercial space and the one story was multiplied by 3.75 to determine the amount of floor area to be used for lodging or residences.
- For residential uses, some of the square footage would be occupied by common areas, including lobby, laundry room(s), mailbox area(s), corridors, elevators, etc; therefore, the residential square footage is reduced by 15% to account for common areas. In other words, of the square footage that would be used for residences, 85% of that would be used for units and 15% would be used for common areas.
- The residential square footage that would be used for units is divided by 1,600 sf, which is used as the average unit size to determine the number of residential units that could be developed.
- For parcels with a potential use of retail or service/lodging, approximately 94% of the total floor area is assumed to be used for lodging. Of this square footage, 65% is assumed to be rooms and 35% is assumed to be lobby, back of house, support, ancillary uses.
- The lodging square footage is divided by 700 sf, which is used as the average room size to determine the total number of rooms that could be developed.
- A few parcels are assumed to have potential future uses of retail or service/lodging/residential. For the ground floor on these parcels, unlike with commercial/lodging or commercial/residential, it is assumed that the entire ground floor would be retail or service uses. Of the remaining square footage, 60% would be for lodging and 40% would be for residential development.

¹ While the original direction was for a 2.5 FAR, based on a comparison with a 2011 Mammoth Lakes Economic Forecast and Revitalization Strategies prepared by Economic & Planning Systems, Inc., and the Town's traffic model a determination was made that the 2.5 FAR was too high. Therefore, a 2.0 FAR was used.

- For comparison purposes, the number of rooms and/or residential units that could occur under the current regulations (using the 80 rooms per acre and 12 units per acre with the provision of community benefits) were generated.
- For properties with existing development, available information relative to the existing development was obtained from the assessor's office regarding existing square footage. In addition, information regarding number of existing units (permanent or transient) on the property was obtained from the Town's 2009 PAOT model run, the Town's Finance Department, and field verification.^{2,3}
- The existing square footage or units/residences, if known, was subtracted from the projected development to determine the net increase in square footage/units/rooms.

² *Permanent Residential Units are the total number of residential units that are occupied on a month-to-month (non-transient) basis or that are used as second/seasonal homes. Permanent Residential Units Include single-family residences, townhomes, condos, and apartments.*

³ *Transient Residential Units are the total number of residential units that are occupied on a weekly or nightly basis (excluding those used as second/seasonal homes). Transient Residential Units Include townhomes, condos, and hotel/motel units.*

C – Comparison of Hotels

MAMMOTH LAKES

Floor Area Ratio Analysis

ASSUMPTIONS REGARDING SIZE OF UNITS/ROOMS

PCR conducted research regarding hotels to determine: 1) the percentage of the hotel square footage that is used for support uses such as lobby, registration, back-of-house, meeting rooms, business rooms, corridors, etc. and 2) the average room size. PCR reviewed hotel plans for some projects and the data is summarized in the attached spreadsheet.

Based on the projects reviewed, there is a wide range of room sizes. In some instances the room size was provided in the data and in other cases the square footage attributed to guest rooms was divided by the number of rooms in the facility. This step resulted in a range of room sizes from 377 sf to 1,648 sf. In addition, in analyzing the percentage of total square footage used for guest rooms, the number ranged from a low of 41% to a high of 74%. (The percentage included 41%, 61%, 64%, 65%, and 74%.) This means for example, that 60% of the square footage is occupied by guest rooms and 40% is occupied by other uses, such as administration, back-of-house, public areas, and internal circulation.

In addition, PCR discussed hotel development with an architect at Gensler. The architect indicated that room size can vary depending on the type of hotel and the amount of amenities provided. An average room size can be 375 to 450 sf. More family oriented facility will have larger rooms; extended stay facilities are bigger since they include kitchenettes. Rooms can be much larger. For example, a presidential suite can range from 1,400 to 1,500 sf. In terms of the proportion of the structure used for rooms and support, the architect indicated that the ratio of rooms to the rest of the hotel can be about a 60/40 split, with 60% of the floor area used for guest rooms and 40% used for common space, back-of-house, operations, etc.

PCR also reviewed plans for the Mammoth View project. Based on figures in the Initial Study, condominiums range from 850 sf to 1,750 sf (unit sizes are: 850 sf, 1,200 sf, 1,240 sf, 1,368 sf, 1,700 sf, and 1,750).

In conducting research on jurisdictions that regulate using FAR, PCR found that Breckenridge, CO determined that the impacts of development are more closely related to the total square footage of a project than the number of units and therefore, requires dwelling units to be converted to square footage. The Town code states: *"It is the intention of the town to limit the total intensity of development by limiting the maximum allowed square footage of each project. To accomplish this policy, the allowed base square footage for any specific project shall be based on the following methods for calculating square footages":*

Conservation District (Downtown Area):

Single Family, duplexes and townhomes 1 unit =1,600 square feet

Condominiums or boarding houses: 1 unit = 900 square feet

All other residential (included bed and breakfast): 1 unit = 1,200 square feet

Outside Conservation District:

Single-family 1 unit = unlimited square footage

Duplex included within site plan level development permit with net density of less than 5 units per acre: 1 unit = unlimited square footage

Duplex included within site plan level development permit with net density of 5 units per acre or more: 1 unit = 1,600 square feet

Townhouse: 1 unit = 1,600 square feet

Hotel, inn, motel, bed and breakfast: 1 unit = 1,380 square feet

Condominiums or boarding houses: 1 unit = 900 square feet

In reviewing various studies, the Dyett and Bahtia paper (p. 3) regarding the Zoning Code Update references an average room size of approximately 1,600 sf. The discussion indicates that with an FAR of 2.5, it is assumed that 1.5 would be devoted to lodging uses. (This results in 60% of the square footage being used for lodging and 40% being occupied by other uses.) The 1.5 FAR for lodging uses corresponds to the floor area typically achieved with a density limitation of 40 rooms/acre, assuming an average room size of approximately 1,600 square feet. The Dyett and Bahtia paper indicates that while this square footage assumption is higher than the average size of a standard guestroom, it takes into account the wide variety of lodging accommodations present in Mammoth (suites, condominiums, cabins, etc.), the larger rooms typical of resorts, and the area required for circulation such as hallways, stairwells, and lobbies.

In reviewing the May 2013 Economic Analysis of Case Study Sites, Site E, which is assumed a 4.7 acre site (205,000 sf) developed with commercial, hotel, and residential (ownership) as follows:

34 residential units (1,200 and 1,600 sf units)

35,000 sf retail

300 hotel rooms (based on 215,000 for hotel = 716 sf/room)

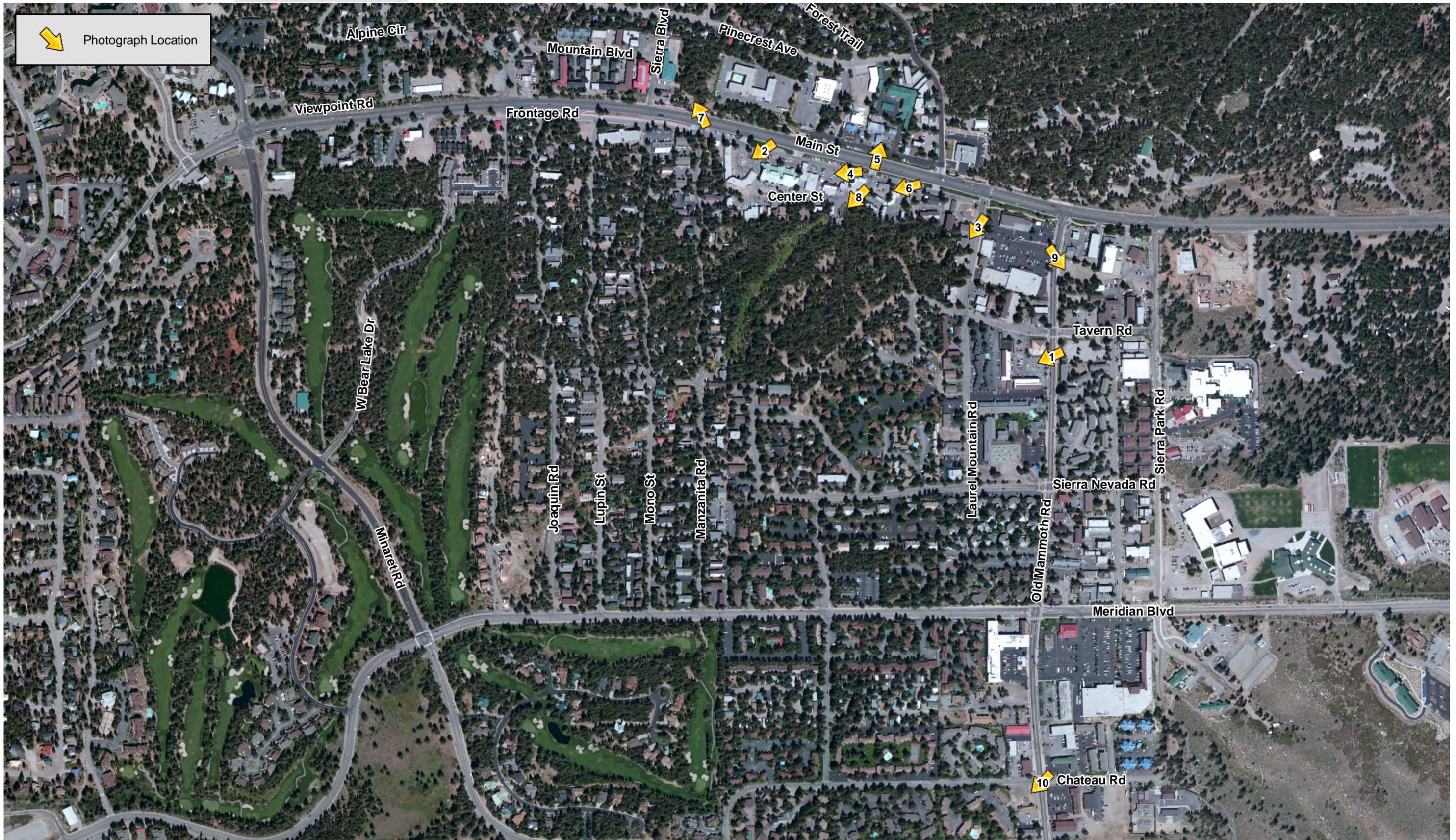
It was determined that, rather than assume an average size for hotel rooms and residential units, that a different assumption was appropriate for the two uses. Based on the research and given the range and fluctuation in lodging room size, PCR used 700 sf for the average room size. In addition, the buildout projections assume that 65% of the lodging square footage would be occupied by guest rooms and 35% of the square footage would be for operations, back-of-house and public areas. For residential units, 1,600 sf is used as an average size. The 1,600 sf takes into account the wide variety of residential units that are developed in Mammoth Lakes.

ANALYSIS OF HOTEL DEVELOPMENTS

	# of rooms	Guest Rooms	Support/Circulation	Public Space	BOH	Total	SF/Room (bldg area/# of rooms)	Range in Room size	Land Area (acres)	Land Area (sf)	Parking Spaces	% sf for rooms to total sf	rms/ac	FAR
Springhill Suites	128	51,281	10,734	5,344	4,027	71,386	558	369 - 496	2.18	94,960.80	128	72%	59	0.75
Courtyard by Marriott	120	41,205	8,199	7,866	3,750	67,320	561	316 - 591	2.38	103,672.80	120	61%	50	0.65
Miramar (Santa Monica)	280	171,508	56,826	40,450		268,784	960					64%		
The Wilshire Gayley	250	169,191				261,883	677		0.57	24,829.20		65%	439	10.93
RTK's info.	257	96,950	15,725	108,453	17,889	239,015	377	350 - 700				41%		
Eagle Lodge (EIR/EA)		100,000	35,150			135,150						74%		
Eagle Lodge (2007 plans)							1,648	1,027 - 2,243						
At the Grove								718 - 1,423						

BOH = Back of house, which includes support functions for the hotel

D - Photographs





Photograph 1: The Mammoth Mall at southwest corner of Old Mammoth Road and Tavern Road.



Photograph 2: Mammoth Luxury Outlets along south side of Main Street.



Photograph 3: Commercial lots on east side of Laurel Mountain Road just south of Main Street.

- PRELIMINARY WORKING DRAFT -



Photograph 4: Commercial center south side of Main Street, located between Frontage Road and Center Street.



Photograph 5: Auto service area north side of Main Street across from Center Street ingress/egress.



Photograph 5: Commercial area south side of Main Street, just east of Center Street along Frontage Road.

- PRELIMINARY WORKING DRAFT -



Photograph 7: Vacant lot north side of Main Street across from Manzanita Road ingress/egress.



Photograph 8: Vacant lots on south side of Center Street.



Photograph 9: Vacant lots on east side of Old Mammoth Road between main and Tavern Road.



Photograph 10: Vacant lot on southwest corner of Old Mammoth Road and Chateau Road.

- PRELIMINARY WORKING DRAFT -

E – Summary Spreadsheet

SUMMARY OF ASSUMED BUILDOUT IN THE STUDY AREA

Category	Acreage	FAR (2.0 All Districts)	No. of Rooms (700 sf/room)	80 rooms/acre	Retail SF	Total Comm'l SF (Service)	Office SF	Residential Units	12 units/acre	Existing Transient	Existing Residential	Existing Comm'l SF	Net increase Comm'l SF (Retail + Service + Office)	Net Increase Rooms (700 sf/room)	Net Increase Residential Units
Redevelop	15.37	1,338,785	532	565	102,672	37,324	32,108	317	86	78	65	60,111	111,993	454	252
Develop	8.25	716,970	305	335	43,301	18,720	100,278	113	31	0	0	0	162,299	305	113
Intensify	3.77	328,618	114	148	87,390	0	63,402	0	0	0	0	55,439	150,792	114	0
TOTAL	27.39	2,384,373	951	1,048	233,363	56,044	195,788	430	117	78	65	115,550	425,084	873	365

SUMMARY OF ASSUMED BUILDOUT BY ZONING DISTRICT

Category	Acreage	FAR (2.0 All Districts)	No. of Rooms (700 sf/room)	80 rooms/acre	Retail SF	Total Comm'l SF (Service)	Office SF	Residential Units	12 units/acre	Existing Transient	Existing Residential	Existing Comm'l SF	Net increase Comm'l SF (Retail + Service + Office)	Net Increase Rooms (700 sf/room)	Net Increase Residential Units
MLR															
Redevelop	3.05	265,489	0	0	0	3,754	0	139	37	39	0	1,472	2,282	-39	139
Develop	1.47	127,303	36	38	0	3,998	0	45	12	0	0	0	3,998	36	45
Intensify	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Subtotal	4.52	392,792	36	38	0	7,752	0	184	49	39	0	1,472	6,280	-3	184
DT															
Redevelop	11.84	1,031,758	496	527	100,076	33,570	32,108	178	49	39	65	58,639	107,115	457	113
Develop	4.48	390,534	269	297	15,957	14,722	25,080	17	5	0	0	0	55,759	269	17
Intensify	3.77	328,618	114	148	87,390	0	63,402	0	0	0	0	55,439	150,792	114	0
Subtotal	20.09	1,750,910	879	972	203,423	48,292	120,590	195	54	39	65	114,078	313,666	840	130
OMR															
Redevelop	0.48	41,538	36	38	2,596	0	0	0	0	0	0	0	2,596	36	0
Develop	2.30	199,133	0	0	27,344	0	75,198	51	14	0	0	0	102,542	0	51
Intensify	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Subtotal	2.78	240,671	36	38	29,940	0	75,198	51	14	0	0	0	105,138	36	51

TOTAL 27.39 2,384,373 951 1,048 233,363 56,044 195,788 430 117 78 65 115,550 425,084 873 365

% of total comm'l 48.10% 11.55% 40.35%
 Total Comm'l (Retail+Service+Office) 485,195