

Lewis Management Corp.

A Member of the Lewis Group of Companies
1156 North Mountain Avenue • P.O. Box 670 • Upland, California 91785-0670
Phone 909.985.0971 • www.lewisinc.com

March 4, 2021

Town of Apple Valley
14955 Dale Evans Parkway
Apple Valley, CA 92307

Reference: Planning Commission Resolution No 2021-002

To the Town Council of Apple Valley:

My name is Spencer Bogner and I manage the development of multifamily communities for The Lewis Group of Companies throughout California. Our company is appreciative of and commends your recent planning efforts; specifically, forming a committee to assess your in-place multifamily development standards, as well the Planning Commission's recent recommendation to approve modified standards with the goal of facilitating development. As the Town and our broader region face a housing crisis, it is commendable to see jurisdictions demonstrating leadership that supports the construction of rental housing.

After having the opportunity to present during the public comment portion of the recent Planning Commission hearing for the item in the reference line, and being requested to provide further feedback responding to the Planning Commission's adopted recommendations, I respectfully make the following suggestions to share a multifamily developer's perspective:

1. The separation between buildings proposed requires two-story habitable structures to be separated by a minimum of fifteen (15) feet. With careful placement of side yards and thoughtfulness in window locations, I believe this can and should be reduced to 8 feet. The building code is more permissive than that, and would allow smaller separations, but in our experience of developing hundreds of units in duplex configurations, eight feet of separation side-to-side is highly appropriate. Front-to-front separation could be reduced to as low as 11.5' relative to habitable, but the side-to-side component is the more important relief for a multifamily developer to obtain, if a choice must be made.
2. The private open space recommendation of 100 square feet for upper floor units is practical, thoughtful, and achievable for the density under discussion. However, the language also references ground floor units needing a minimum of 250 square feet with a minimum width of ten feet. This is a challenging requirement to meet, particularly for the lower-density multifamily product types that Apple Valley is trying to encourage with these development standard modifications. It is more probable that, left to their own choice, the residents of the

rental community would prefer the cost proposed to be spent on an incremental 150 square feet of patio instead be spent within the interior of their rental home.

Furthermore, the introduction of “upper floor” and “ground floor” units overlooks product types such as townhomes, creating potential confusion in the ultimate implementation of the code. Establishing a standard of 100 feet of required private open space for all unit types would be a way to let the market determine the optimal outcome for both developers and their customers, while ensuring planning standards of the highest quality remain in effect.

3. After much deliberation during the Planning Commission hearing on the topic, the Commission decided that the storage requirement should be 200 cubic feet of lockable storage space. The provision as drafted also excludes wood construction. In my experience, both the volume of storage space and this material requirement would be challenging to meet in an economical fashion.

As the developer is required to meet the storage requirement on the exterior, they may prefer to decrease storage that would otherwise be planned within the net rentable square footage, which would be the optimal solution for all parties. As the burden of maintenance ultimately falls upon the operator, precluding wood construction could lead to an industrial aesthetic and a high cost that further challenges the feasibility of developing homes. My recommendation would be to entirely drop this requirement, or to modify it to something more easily achieved in practice.

In closing, I'd like to thank staff, the Planning Commission, and the City Council for continuously soliciting feedback and for taking the initiative to support multifamily development. If there are any questions about any of the comments that I've provided, do not hesitate to reach out to me for clarification. Every successful development requires a partnership between government, business, and the broader community; in considering these modified standards for adoption, the Town of Apple Valley is setting the stage tonight for a successful tomorrow.

Sincerely,



Spencer Bogner

Vice President - Multi-Family Development

Lewis Management Corp.

1156 N. Mountain Avenue

Upland, CA 91786

Spencer.Bogner@lewismc.com

(909) 946-7523 Direct/Fax

www.LewisGroupOfCompanies.com / www.LewisCareers.com