

January 26, 2024

[Sent via email: zdahl@cityofsanmateo.org]

Zach Dahl
Community Development
City of San Mateo
330 West 20th Avenue
San Mateo, CA 94403

Re: General Plan 2040 Comments

Dear Zach and City staff:

On behalf of HSC Property Owner LLC, the owners of the Hillsdale Shopping Center and surrounding properties (Hillsdale Mall Site), we congratulate the City on releasing the final 2040 General Plan and appreciate the opportunity to submit comments on the most recent version as well as the robust engagement process executed by the City during this multiyear process.

As you may know, our team is actively monitoring the multiple long-range planning efforts occurring in the City to understand the City's needs and goals so that the long-range planning and development efforts for the Hillsdale Shopping Center can evolve in alignment with the City's long-term vision.

We have carefully followed the development of General Plan 2040, and see reflected in the January 2024 release many of the revisions discussed by the City Council. However, the January 2024 release also includes a new assumption that the average building story height is 11 feet,¹ which was not included in prior versions of General Plan 2040. We request that the City remove references to average story height, or at least clarify the limited purpose of such language, for the reasons set forth below.

Throughout the General Plan update process, height has been a widely discussed and regularly scrutinized issue. Yet across General Plan documents, the controlling standard for building height has been identified as stories, with maximum height under the January 2024 release of General Plan 2040 set at 8 stories for the Residential High and Mixed-Use High land use designations.² The latest release of the General Plan is consistent with prior practice and clearly states that "Building heights are expressed by the number of stories."³ This is an appropriate metric for the General Plan to provide long-term, high-level guidance on development standards and allow flexibility for specific height requirements to evolve in the coming decades as the Measure Y process and Zoning Code updates incorporate both public sentiment and advances in construction technology. Including average story height measured in feet confuses the General Plan's purpose to provide high-level guidance. We recommend deleting the reference to average story height in feet to reflect the General Plan's intent to control with stories. If any language is retained regarding average story height, it should be made clear in the text of the General Plan that references to average story height have only been assumed for high-level planning purposes and that any actual height standards or limits will be articulated in the Zoning Code, which will control.

Furthermore, an average story height of 11 feet is unrealistic and does not advance the City's vision for vibrant streetscapes with high-quality ground-floor retail and mixed-use development, nor is it appropriate for cultural or entertainment uses, nor for high-quality design. The City's newly-adopted Objective Design Standards require ground floor commercial uses in mixed use residential buildings to be at the very least 12 feet,⁴ and standard industry practice requires even higher ceilings for ground floor commercial and other desirable uses, including

¹ Strive San Mateo General Plan 2040 (January 2024), at pp. 40, 241.

² Strive San Mateo General Plan 2040 (January 2024), Table LU-1 at pp. 41-42.

³ Strive San Mateo General Plan 2040 (January 2024), at p. 40.

⁴ Objective Design Standards, at p. 31,

commercial office (14 feet), entrance lobby levels (18 feet), and grocery stores (22 feet). Recent approvals by the City are consistent and regularly include story heights greater than 11 feet across residential and commercial uses.⁵ An overview of ceiling heights in several example projects is included as **Attachment A**.

Thank you for your time and careful consideration.

Sincerely,



David Bohannon

Cc:

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Attachment A: Project Examples

Concar Passage Mixed Use Project (located on Concar Drive between S. Grant Street and S. Delaware Street)

- Mixed-use development (961 residential units and 40,000 square feet of commercial uses)
- Floor heights: (Found on Sheets A1-2.0/2.1; A2-2.0/2.1; A3-2.0/2.1; A4-2.0/2.1; A5-2.0; A6-1.0)
 - o Building 1: (PDF pages 194-95)
 - § 12' between levels one and two
 - § 10' between levels two through five
 - § 9' between level five and rooftop
 - o Building 2:
 - § 12' between levels one and two
 - § 10' between levels two through five
 - § 9' between levels five and rooftop
 - o Building 3:
 - § 12' between levels one and two
 - § 10' between levels two through five
 - § 9' between levels five and rooftop
 - o Building 4:
 - § 12' between levels one and two

⁵ For example, the Bespoke project (401-405 South B Street) is a mixed-use development with story heights between 13' 3" and 17' 6" for commercial and office uses, and ranging from 10' to 15' for residential uses and related amenities. Other mixed use projects with story heights ranging beyond 11 feet include Block 20 (S. Claremont Street & E. 4th Avenue), and Post + Beam (66 E. 3rd Avenue).

- § 10' between levels two through five
- § 9' between levels five and rooftop
- o Building 5:
 - § 12' between levels one and two
 - § 10' between levels two through five
 - § 9' between levels five and rooftop

Bespoke (401-405 South B Street); [Bespoke-Project-Plans 10162023 \(cityofsanmateo.org\)](https://www.cityofsanmateo.org/development-services/planning-and-zoning/development-services/planning-and-zoning-projects/bespoke-project-plans-10162023)

- Mixed-use development (office, commercial, and residential uses)
- Floor heights:
 - o Commercial & Office uses: (Sheet A4.0)
 - § 15' between sublevel one and level one/grade
 - § 17'-6" between levels one and two
 - § 13'-3" between levels two through the top of the roof plate
 - o Residential (with related amenities) use: (Sheet AR3.20)
 - § 15' between the sublevel one and level one/grade
 - § 16' between levels one and two
 - § 10' between level two to the top plate

Block 20 (S. Claremont Street & E. 4th Avenue)

- 6-story building that includes five stories of office use and 86 residential dwelling units, with a two story underground parking structure.
- Floor heights (found on Sheets S-3.01/02; A-4.01)
 - o 10' between sublevel two and sublevel one
 - o 13' between sublevel one and level one/grade
 - o 14' between levels one and two
 - o 13'-6" between levels two through four
 - o 11' between levels four through six
 - o 12' between level six and the top plate

Post + Beam (66 E. 3rd Avenue)

- 6-level commercial building with a two-sublevel basement parking structure adjoining a 7-story residential building.
- Floor heights (found on Sheets A-4.0 (commercial) and
 - o Commercial portion (found on Sheet A-4.0)
 - § 14' between sublevel two through level one/grade
 - § 18' between levels one and two
 - § 14' between levels two through to the top of the roof plate
 - o Residential portion (found on Sheet AR-3.01-02, 3.20)
 - § 13' between levels one and two
 - § 10'-3" between levels two through to the top of the roof plate

2 W. 3rd Avenue (heard on January 23, 2024) [Meeting \(primegov.com\)](https://www.primegov.com/meetings/2-w-3rd-avenue)

- Four-story office building with a fifth story of residential units on an 11,035 square foot lot
- Floor heights: (see Sheet A3.01)
 - o 11'-10" between level 1 and 2
 - o 11'-6" between levels 2 through five

477 9th Ave (heard on December 12, 2023) [Meeting \(primegov.com\)](https://www.primegov.com/meetings/477-9th-ave)

- Mixed-use project containing 120 rental dwelling units over 27,076 square feet of office uses within a five-story building.
- Floor heights: (see Sheet AP3.20)
 - o 12' between levels one through three
 - o 10'-2" between floors three through five
 - o 9'-2" from floor five to the roof plate

616 B Street (heard on December 12, 2023) [Meeting \(primegov.com\)](https://www.primegov.com/meetings/616-b-street)

- Mixed-use project containing retail and residential
- Floor heights: (see Sheet A3.01)

- o 14'-6" between level one and two
- o 10' between levels two through to the roof plate