



March 4, 2024

City of San Mateo
330 W 20th Ave.
San Mateo, CA 94403

To the honorable San Mateo City Council,

HLC's mission is to work with communities and their leaders to produce and preserve quality affordable homes. Producing quality affordable homes requires jurisdictions to zone for them. San Mateo's General Plan update presents an important opportunity to rezone for a substantial increase in housing production at a range of affordabilities.

In order to ensure San Mateo's General Plan provides adequate capacity to meet local housing needs for the next 15 years, the city council should:

1. Reinstitute the High II zoning designation allowing up to 10 stories and 200 du/ac. Alternatively, though less impactful overall, the council could increase the allowable density under the High I proposal to promote greater flexibility for developers while maintaining the currently proposed heights.
2. Maintain all current areas included in the General Plan update at their current heights and densities or greater. All parts of San Mateo must contribute to addressing the housing crisis. Allowing neighborhood-by-neighborhood vetoes after so many years of work undermines the comprehensive process San Mateo has pursued to create the current plan.
3. Allow the definition of a "story" of height to be defined in the zoning update, not within the General Plan update itself. As a guiding document, the General Plan should allow the council discretion to specify definitions for the parameters of regulation in the zoning code.

San Mateo must plan for the longterm future if the General Plan update is to succeed. Current high interest rates make denser development more difficult in many circumstances, but this is a 15-year plan. Five years ago, interest rates were near zero; five years from now, they may well be substantially lower than they are today, enabling a wider range of development types. Even with the current rates environment, nearby cities have had proposals for denser development in recent months, including a June 2023 proposal for 8 stories in [Palo Alto](#) and a December 2023 proposal for a 10-story 100% affordable development in [San Bruno](#). Flexibility makes more affordable development possible.

Similarly, ever-evolving technologies will increasingly make development feasible at a range of

heights and densities. Some of San Mateo's leaders have asserted that allowing 8 versus 10 stories in the General Plan update does not matter because housing development rarely occurs at 7-15 stories due to the high marginal cost of changing construction types from wood- to steel-framed buildings. However, technologies like cross-laminated timber increasingly enable development at 7-15 stories by eliminating the marginal cost of switching to steel frame. In recent decades, cross-laminated timber has been used to successfully build developments at 9, 10, 12, and 15 stories, according to [case studies](#) prepared by the Urban Land Institute. Including the High II zoning designation will have a meaningful impact on the city's ability to meet its affordable housing goals.

In general, HLC sees the General Plan update as an important but small first step toward promoting housing affordability in San Mateo. The update considers a relatively narrow area for rezoning, focused exclusively on pre-existing multi-family and commercial areas. Even with a successful General Plan update, almost 70% of San Mateo's residential land [outright bans](#) affordable homes with exclusionary zoning. Longterm, rezoning a greater area of the city for increased heights and densities will be necessary to ensure housing supply can meet demand.

Nonetheless, the General Plan update presents a unique opportunity to promote affordable homes. San Mateo's city council and staff have worked hard to prepare a successful update. The council can further support their efforts by increasing heights and densities and requesting greater flexibility to define definitions beyond the General Update.

Thank you for your consideration,

A handwritten signature in black ink, appearing to read 'J. Levine', with a large, stylized initial 'J'.

*Jeremy Levine, Policy Manager
Housing Leadership Council of San Mateo County*