PLACEWORKS

MEMORANDUM

DATE January 16, 2026

TO City of San Mateo

FROM PlaceWorks

SUBJECT Key Issues White Paper – Building Height

Introduction

Building height limits was a key issue of community interest during the Strive San Mateo General Plan 2040 adoption process. Dating back to 1991, the City's height limits were set by voter initiative (Measures H, P and Y) and implemented through the General Plan. With the adoption of General Plan 2040 in March 2024, and the subsequent voter approval of Measure T in November 2024, the City's height limits were effectively increased with reduced height regulation contained in the General Plan. As part of General Plan implementation, the Comprehensive Zoning Code Update (CZCU) project will establish updated height limits within the City's Zoning Code (Title 27) to align with the story limits contained in the General Plan. Height regulations are most typically contained in a jurisdiction's zoning code, and this transition is intended to align with that best practice and implement an updated approach for how the City sets and regulates height.

Prior to starting the CZCU project, the City drafted four new high-density districts for residential and mixed-use zones to implement the highest allowed densities referenced in the General Plan (99 units/acre and 130 units/acre). Public hearings to consider adoption of these new high density districts are planned for the first half of 2026. The work to draft these updated standards included assessments of appropriate building height limits for this level of density, and helped to inform the height requirements and regulations discussed in this white paper.

This white paper includes a review of the existing height regulations in the Zoning Code, directions and policies in the General Plan, a recent state bill related to height and proximity to public transportation, best practice options and considerations, and questions that will be asked for the public to provide input.

City and Community Goals

The City is seeking to update the Zoning Code's building height regulations to ensure development feasibility for the identified densities and/or intensities, while providing reasonable and context-sensitive transitions between zoning districts and development projects in San Mateo. The City wants

to clarify the height measurement rules for correlating the story limits set by the General Plan to the maximum allowed height in terms of feet. Additionally, the City wants to improve the clarity of the code and make the building height regulations more user-friendly and better aligned with current construction practices. For the new high density districts (discussed in detail below), the City asked for building height sections to help visualize the potential height and massing of buildings and illustrate how stories translate to feet for different building types (i.e., residential, mixed-use, commercial, etc.).

Overview of Key Issue Topic

In zoning codes, building height regulations are established to dictate the maximum allowed height in terms of feet and/or the number of stories, define how height is measured, provide parameters for allowed design features, and outline specific height exceptions. These regulations must balance multiple planning objectives, including meeting residential density requirements from the General Plan, accommodating appropriate building types, complementing the existing neighborhood character, and ensuring economic feasibility for developers.

Properly setting height limits requires analyzing a community's existing regulations and conditions. It also means considering the California Building Code (CBC), which links building height to specific construction materials and methods. Failing to review these conditions can inadvertently make desired development types economically unfeasible, hinder density goals, and/or result in building styles that do not align with the community's vision.

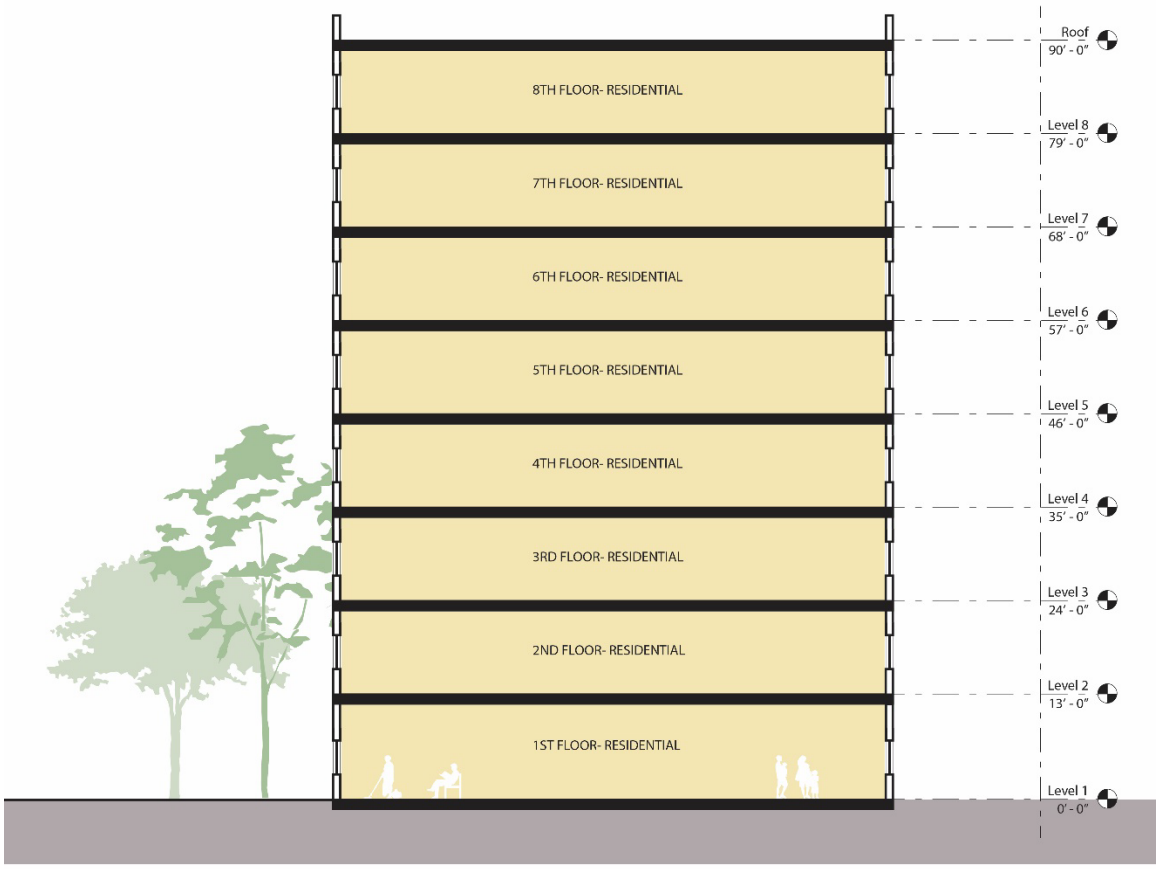
To create projects that align with community objectives, height regulations often provide limits in both feet and the number of stories. Height is typically measured from the existing grade (i.e., the ground's surface level before construction, or the proposed exterior grade, whichever is lower) to the top of the roof structure. Adopting effective building height regulations requires them to correlate with density requirements, provide clear and adaptable rules, and allow for flexibility in design.

High Density District Analysis

As part of the process for drafting the four new high density districts, the Project Team analyzed how the General Plan's new higher density requirements aligned with the existing height standards in the Zoning Code. This process involved developing a methodology to correlate building height, measured in both feet and the number of stories – the latter being specified in the General Plan – with density and other development standards. The Project Team worked together to arrive at assumptions for floor heights for different types of projects to calculate maximum height for each of the new districts based on the maximum number of stories allowed in the corresponding General Plan land use designation.

Based on these height guidelines, the Project Team created illustrations for three types of example projects: (1) an eight-story residential-only project; (2) an eight-story mixed-use project with ground-floor retail, office space on the second, third, and fourth stories, and residential on the fifth through eighth stories; and (3) an eight-story office-only project. The illustration below shows the residential-only project type for an eight-story building, representing the General Plan's Residential High land use designation. The building height standards in this illustration were designed based on a 13-foot floor-

to-floor height standard for the first story, 11-foot floor-to-floor height standard for all subsequent floors above, and a consistent 14-inch floor thickness throughout the building, which is not marked on the illustration. The first floor is designed with a higher floor-to-floor height to accommodate common area lobby activities and amenities, mechanical and utility spaces, and to provide a more flexible ground-floor presence along the street.



RESIDENTIAL ONLY
*Structures above 6 stories cannot be Type V wood construction

Source: PlaceWorks (2025)

For non-residential-only projects and mixed-use projects that include non-residential uses, the ground-level and typical floor ceiling heights are calculated based on similar assumptions, with higher ceiling heights allowed for ground-level and non-residential floors. After specific heights were calculated for the four project types, the City made the decision to round the building height to the nearest "0" or "5" number in the ones-place to make the Zoning Code more user-friendly. For example, for the proposed Mixed-Use 4 District that would implement the General Plan's Mixed-Use High land use designation, the maximum allowed building height for feet was increased from 98 feet to 100 feet to accommodate eight stories for a mixed-use project with residential units. The proposed height limits for the four high density districts are as follows:

Proposed Zoning District Name	Residential Height Limit		Mixed-Use with Residential Height Limit		Non-residential Height Limit	
	Measured in Number of Stories	Measured in Feet	Measured in number of stories	Measured in Feet	Measured in Number of Stories	Measured in Feet
R6	6	70' (11.7'/story)	N/A	N/A	N/A	N/A
R7	8	90' (11.25'/story)	N/A	N/A	N/A	N/A
Mixed-Use 3	6	70' (11.7'/story)	6	75' (12.5'/story)	4	60' (15'/story)
Mixed-Use 4	8	90' (11.25'/story)	8	100' (12.5'/story)	5	75' (15'/story)

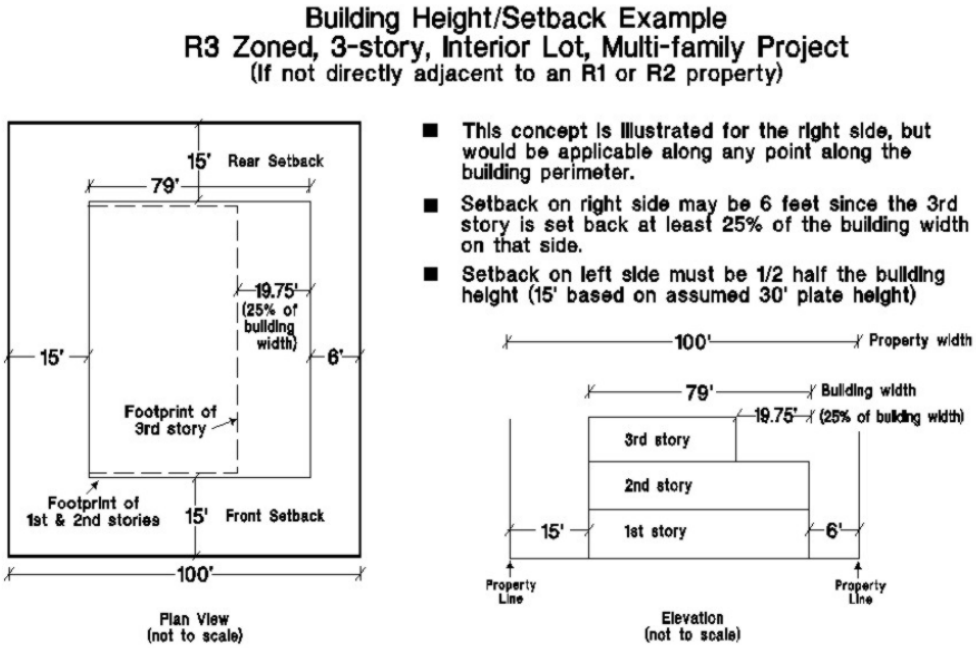
Brief Summary of Current Title 27 (Zoning) Regulations

The current regulations in the Zoning Code that address building height are summarized below:

- The SMMC includes building height regulations throughout Title 27 (Zoning). However, building height regulations for nearly all of the zoning districts refer back to the General Plan 2030 Building Height Plan rather than being included directly in the Zoning Code.
- The R1 and R2 Districts are the only districts with specific height regulations provided in the Zoning Code. Section 27.18.050 (Building Height and Daylight Plane) provides the following two required maximum height limits: walls can have a maximum height of 24 feet, and the highest point of the roof can have a maximum height of 32 feet. Both of these limits are measured from the existing grade and apply in the R1 and R2 Districts. Existing homes that exceed the height limit are allowed to construct additions to the existing roof line height. The Section also provides daylight plane[1] regulations in the R1 and R2 Districts for both the primary buildings and structures. The daylight plane is intended to prevent buildings from overshadowing their neighbors while allowing for encroachment features (e.g., dormers, architectural elements, antennas), hillside parcels, and other specific conditions.

[1] Section 27.04.143 (Daylight Plane) defines "daylight plane" as an "inclined plane, beginning at a stated height above grade and extending into the site at a stated upward angle to the horizontal, which may limit the height or horizontal extent of structures at any specific point on the site where the daylight plane is more restrictive than the height limit or the minimum yard applicable at such point on the site.

- Section 27.02.060 (Height Limitations and Exceptions) provides supplemental building height regulations and exceptions to maximum allowed height regulations for accessory features, such as parapet walls, elevator enclosures and mechanical equipment, for individual zoning districts, except for the R1 and R2 Districts. This Section includes exceptions to maximum height and bulk regulations for improvements or additions to existing nonconforming buildings. This Section also gives the Zoning Administrator authority to require applications to go through additional review by the Planning Commission for specific project features.
- Chapter 27.40 (Building Height and Bulk) has a chapter title that presumably is applicable for building height regulations citywide. However, the regulations in the chapter only apply to the Downtown Specific Plan area.
- Section 27.04.080 (Building Height) defines the term "building height" in the SMMC as the following: The vertical distance, measured from existing grade at any point along the perimeter of a building, to the highest plateline of the structure directly above that point, regardless of whether that point is on the same plane as the building where it touches the ground. Different setback requirements as a result of different building heights shall be applied to different portions of the building. Setback requirements determined by building height may utilize the height of an intermediate plate height of the building plane that touches the ground where the building above that intermediate plate height is set back a distance equal to 25 percent of the width of the structure at that point from the building plane that meets the ground, as illustrated in the following figure:



General Plan's Direction and Policies

The General Plan introduced four new land use designations (Residential Medium II, Residential High, Mixed-Use Medium II, Mixed-Use High) to allow for higher densities. The General Plan also provides the maximum number of stories, but not the corresponding maximum height measured in feet, that will be allowed for each of these four new land use designations. This was an intentional policy choice that was made in order to move specific height regulations out of the General Plan and into the Zoning Code.

The following lists these four new land use designations and their corresponding allowed density, height limits, and floor area ratio (FAR) regulations, where applicable:

- Residential Medium II: 51 – 99 units/acre | 4 – 6 stories | N/A
- Residential High: 100 – 130 units/ acre | 5 – 8 stories | N/A
- Mixed-Use Medium II: 51 – 99 units/acre | 4 – 6 stories | 4.0
- Mixed-Use High: 100 – 130 units/acre | 5 – 8 stories | 4.5

These General Plan height limits and densities are in effect, but the City does not have corresponding zoning districts or development standards that align with these higher heights and densities. To address this, the City will present four new high density districts to the Planning Commission and City Council to consider for adoption in the first half of 2026 to provide clarity to the higher densities and corresponding building height limits that are already in effect. These high density districts will be subsequently incorporated into the CZCU.

State Law Compliance

Senate Bill (SB) 79 will become effective on July 1, 2026. This law requires all jurisdictions in eight counties, including San Mateo County, to approve qualified transit-oriented development (TOD) housing projects near certain major transit stops, effectively increasing allowable density in those areas. Additionally, SB 79 sets specific density and height limits for projects that provide the required percentage of affordable housing units for lower-income households. The height limits range from 55 feet to 95 feet depending on one of two TOD stop types and the project distance from the stop. As part of the CZCU, the City will need to analyze the building height regulations in the Zoning Code to meet the requirements of SB 79. More information about SB 79 and how it applies to sites within the City of San Mateo can be viewed here: https://www.cityofsanmateo.org/4922/State-Legislation-Information-and-Resour.

Best Practice Options and Considerations

This section outlines best practices and key considerations drawn from City staff input, state guidance, and comparable jurisdictions. The Project Team reviewed best practices from comparable jurisdictions to ensure the updated regulations reflect current planning standards successfully applied in comparable

communities. These references help identify approaches that are clear, consistent, and adaptable to San Mateo's goals and current built environment. The comparable jurisdictions referenced in this white paper include the cities of Costa Mesa, Milpitas, Sacramento, and Stockton, and Santa Clara County.

- Costa Mesa was chosen because part of the code was recently updated and was seen as a good example by city staff.
- Milpitas was chosen because it was just comprehensively updated in 2025, the city has a similar built environment to San Mateo and is located nearby, and the code includes clear writing and consistent organization.
- Sacramento was chosen because it was seen as a good example by city staff and contains a detailed list of administrative and permit processes and procedures.
- Stockton was chosen because it was just comprehensively updated in 2025, includes Clear and concise writing, the use regulations and development standards are clear and well-written, and there are detailed and easy-to-use site development and specific to use regulations.
- Santa Clara County was chosen because it is located nearby, it contains clear writing and organization, and is well-organized by different residential district types (e.g., Rural, Urban Residential).

The following considerations will help inform how the San Mateo's building height regulations are updated:

- The definition for "building height" should be clarified. The current definition both defines the term and also provides the rules of measurement for the standard. Other jurisdictions separate the definition of "building height" and then provide the rules of measurement in a different section of the Zoning Code. The definition would also benefit by being simplified to improve clarity for the reader. Specifically, building height is measured from the existing grade rather than from the lower of the existing or proposed grade, which could result in an actual building height that exceeds the height calculated under the code. Furthermore, building height is measured to the top of the roof plate, which might differ from the requirements adopted in many other jurisdictions.
- Most comparable jurisdictions reviewed include building height regulations that are measured in both feet and the number of stories. This practice is currently being utilized for the new high density districts and should continue to be implemented for all zoning districts in the CZCU.
- Building height regulations for nearly all zoning districts (not including the R1 and R2 Districts) reference the General Plan rather than directly including height limits in the Zoning Code. However, all comparable jurisdictions align with standard zoning code practice by including height requirements directly in the zoning code rather than cross-referencing to the General Plan. This is convenient for users and mirrors other quantitative measurements provided in the City's Zoning Code. Therefore, height regulations should directly be included in the Zoning Code. As noted above, General Plan 2040 supports this approach by not including any specific height limits, other than story ranges.

- As discussed in the "Brief Summary of Current Title 27 (Zoning) Regulations" section above, the maximum height in the R1 and R2 Districts are currently provided and measured by two separate standards: the maximum height of the walls, which is 24 feet, and the highest point of the roof, which is 32 feet. However, all comparable jurisdictions measure maximum height only in terms of the maximum height of the building itself, rather than by separate wall plate and roof heights. Based on this review, in San Mateo's R1 and R2 Districts, the City may want to adopt an updated limit that is only measured in terms of the maximum height of the building. Additional height measurement regulations and exceptions may be provided within the definition of building height in the new definition chapter of the Zoning Code. Additionally, further research will be conducted to determine and align the current maximum height of the R1 and R2 Districts with the maximum height provided in General Plan 2040. Since General Plan 2040 provides maximum height in terms of the number of stories only, the maximum allowed height in terms of feet will need to be aligned with the maximum number of stories for the R1 and R2 Districts.
- The list of supplemental building height regulations and exceptions to maximum allowed height regulations for accessory features provided in Section 27.02.060 (Height Limitations and Exceptions) will need to be reviewed. As many other jurisdictions take a more balanced approach or establish explicit height limits for height exemptions, the City should determine if reconsidering the height exemption for mechanical systems is needed or consider setting up limitations on height exemptions for mechanical systems. The review could determine whether there are additional accessory rooftop and roofline features that should be incorporated into these regulations, such as rooftop telecommunication facilities. Additionally, this review will evaluate how height limitations and exceptions can support and facilitate high-quality architectural design. Furthermore, this Section will need to be further reviewed to determine if any specific exceptions should be adopted to allow rooftops to be utilized as common usable open spaces for residents of a development project.
- The existing maximum allowed building heights are not high enough to accommodate the higher densities allowed in the current code for the R4, R5, R4-D, R5-D, and R6-D zoning districts. The maximum allowed building heights will need to be updated to align with the story ranges and required densities contained in General Plan 2040.
- Additional research is needed to determine how to best address the current daylight plane regulations in the Zoning Code.

Measuring Building Height

As discussed above in the "High Density District Analysis" section, the Project Team drafted the updated regulations by establishing assumptions about building height standards based on a review of the current City's regulations and industry best practices. The Project Team considered how to correlate building height measured in both feet and the number of stories for multi-family residential, mixed-use, and office project types in relation to the number of required floors for each General Plan land use designation.

For determining the height for all other zoning districts during the CZCU process, the Project Team is seeking additional input whether to continue with a similar or alternative approach to either simplify or be more exact when determining building height for a zoning district. Additional regulations the Project Team will add into the Zoning Code include, but are not limited to, flexibility for hillside and sloping sites and accommodations for rooftop features (e.g., mechanical equipment and parapets).

Potential Questions for Public Input

- What are the biggest challenges with the current building height regulations?
    - Maximum height is too low
    - Maximum height is too high
    - Inconsistent standards between zoning districts
    - Confusion from General Plan references
    - No challenges
    - Other (please specify):
- Which of the following best reflects your top priority when determining building height limits?
    - Encouraging more housing options and affordability
    - Supporting mixed-use and commercial development
    - Preserving neighborhood character and existing scale
    - Promoting sustainable, transit-oriented development
    - Other (please specify):
- What types of building and property design features make taller buildings more appealing? (Please select all that apply.):
    - Step-backs and varied rooflines
    - High-quality materials and façades (ornamentation)
    - Street trees and wide sidewalks
    - Ground-floor commercial uses
    - Visual changes between taller building elements
    - None, I prefer lower heights regardless of design
- When interpreting a zoning code's definition and measurement rules for "building height," are there any particular challenges you frequently come across when submitting an application? If yes, what are those challenges from the definition and measurement rules?
- In San Mateo's current Zoning Code (Title 27 of the San Mateo Municipal Code), to measure a building's height, one must measure the vertical distance from the existing grade at any point

on a building's perimeter to the highest plateline[2] directly above that point. Which of the following building height definitions/measurement methods would you recommend adopting in San Mateo's zoning code update? And, should the measurement be taken from existing grade, finish grade, or whichever point is lower?

  - Vertical distance from grade to the highest point on the roof, including roof-top mechanical equipment and screening.
  - Vertical distance from grade measured as the average elevation at the front of the building, to the plateline where the roof meets the wall.
  - Vertical distance from grade to an imaginary plane that is the allowed distance above and parallel to the finished grade, or as provided by the California Building Standards Code.
  - Vertical distance from grade to the top of a building or structure. On sloping lots, height is measured from a hypothetical surface representing the average grade.
  - Vertical distance from grade to the highest point on the roof above. For a sloped, gable, hipped, or gambrel roof, the measurement is taken to the midpoint between the highest point on the ridge and where the eave meets the wall.
  - Other (Please specify the jurisdiction and/or the definition):

- Are there examples in other cities that provide clear, easy-to-use, and feasible regulations for correlating building height in terms of feet and the number of stories?

[2] In SMMC Section 27.04.386 (Plateline), the term "plateline" is defined as "the line established by the horizontal girder which supports the trusses or rafters of a roof." In other words, a plateline is where a roof meets the exterior wall of a building.