PLACEWORKS

MEMORANDUM

DATE January 16, 2026

TO City of San Mateo

FROM PlaceWorks

SUBJECT Key Issues White Paper – Setbacks and Buffers

Introduction

Building setbacks establish the required distance between structures and property lines, streets, or other site features, and are a fundamental tool for regulating the scale, placement, and massing of development. Building setbacks play a critical role in shaping the physical form of San Mateo's neighborhoods, influencing streetscape character, access to light and air, and privacy. When thoughtfully designed, setback standards help create safe, comfortable, and visually cohesive neighborhoods, directly supporting the Strive San Mateo General Plan 2040 goal to enhance San Mateo's Neighborhood Fabric and Quality of Life. As the city continues to evolve under the guidance of the General Plan, understanding how setback requirements function across different contexts will be vital to ensuring that standards for future development are compatible with existing neighborhoods and contribute to high-quality design.

Prior to starting the Comprehensive Zoning Code Update (CZCU) project, the City drafted four new high-density districts for residential and mixed-use zones to implement the highest permitted densities that were adopted 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 to provide clarity to the General Plan story limits that are already in effect. The work informed the setback and buffer requirements and regulations for the City's higher density zoning districts and uses discussed in this white paper.

This white paper also addresses the setback and buffer regulations for the lower-density residential districts and all commercial, office, and manufacturing districts. The lower-density residential zoning districts (i.e., R1 and R2) provide setback regulations (referred to as "yards") for front, side, and rear areas. This white paper includes a review of the existing setback and buffer regulations in the Zoning Code, directions and policies in the General Plan, recent state bills, best practice options and considerations, and questions that will be asked for the public to provide input.

City and Community Goals

The City wants to ensure the setback, buffer, and build-to-line requirements in the SMMC meet their desired objectives while also allowing for flexibility to support a range of project types. The City's current setback and build-to-line standards are very prescriptive with a variety of requirements based on location and adjacent zoning districts. In addition, the setback standards need to be calibrated to ensure that they support the new density regulations in General Plan 2040. The buffer standards should balance encouraging development with maintaining appropriate buffer distances between less compatible uses. Additionally, the City wants to ensure that setback standards for smaller parcels do not make the parcels undevelopable.

Overview of Key Issue Topic

In zoning codes, setback, buffer, and build-to-line regulations must each balance multiple planning objectives. These include being calibrated to accommodate residential density requirements from the General Plan, supporting the development of appropriate building types, complementing the existing neighborhood character, ensuring adequate light, ventilation, fire safety, and privacy provisions are provided for residents, and ensuring economic feasibility for developers. In addition, these standards must be calibrated differently for lower-density residential project types, such as those in R1 and R2 Districts, versus medium- and higher-density residential districts to ensure that each district can feasibly achieve its intended density and design. Properly establishing setbacks, buffers, and build-to-line standards based on the intended purpose and density of a zoning district requires analyzing the City's existing regulations and conditions.

To create projects that align with community objectives, setback and buffer regulations often vary depending on the location and building type. Setbacks are often regulated in the front, interior side, street/corner side, and rear areas for a parcel and are typically measured as the minimum distance from a property line, street, or other boundary that a structure must be located. Buffers, often landscaped areas, are designed to separate and mitigate incompatible land uses, such as residential uses from industrial uses. Build-to-line standards can be viewed as being the opposite of setback standards. Where setbacks measure the minimum distance from a boundary, build-to-line standards measure the minimum distance from a street where a building's façade or architectural feature is required to be built in order to encourage a walkable, active, and safe street area. For higher-density residential and non-residential zoning districts, build-to-line standards and reduced setbacks often support transit-oriented and walkable urban development, while lower-density districts typically rely more on traditional setbacks and landscaped buffers to maintain a less urban single-family residential neighborhood character.

Brief Summary of Current Title 27 (Zoning) Regulations

The following list provides the sections in the SMMC that address setbacks, buffers, and build-to-line standards:

- The lower-density residential zoning districts (i.e., R1 and R2) provide setback regulations for front, side, and rear areas. In the R1 District, these regulations vary by subdistrict, with different standards applied in the R1-A District compared to the R1-B and R1-C Districts. The R2 District applies the same setback regulations as the R1-B and R1-C Districts. Setback and buffer regulations for the R1 and R2 Districts also include provisions for garage front setbacks, landscaping requirements, and limits on the maximum area allowed for paving.
- Additionally, the R1 and R2 Districts both contain specific standards governing exceptions to the setback requirements regarding how certain elements, such as awnings, patios, decks, bay windows, flagpoles, and chimneys, may project into or encroach on required setback areas. Section 27.18.100 (Structures and Building Projections in Required Yards) in the SMMC outlines the respective standards for various types of building projections and features permitted in all yards and specific standards for the projections permitted in front yards.
- The medium- to higher-density residential zoning districts (i.e., R3, R4, R5, R4-D, R5-D, and R6-D) also provide setback regulations for front, side, and rear areas. The setback standards provided for the R3 District are also applicable to the R4 and R5 Districts. The R3, R4, R5, R4-D, and R5-D districts also provide build-to-line regulations for properties within the Gateway area as defined in the Downtown Specific Plan.
- The commercial zoning districts (i.e., C1, C2, C3, and C4) provide requirements for building buffers. The C1 District also provides setback regulations for parcels fronting on El Camino Real from 9th Avenue to Belmont and build-to-lines for parcels fronting on El Camino Real from State Route 92 (SR 2) to Belmont and the Central Business District, respectively.
- The office zoning districts (i.e., E1 and E2) provide setback regulations along street frontages. The office zoning district regulations also require landscape buffers when parcels with office uses are contiguous to residential districts.
- The manufacturing district (i.e., M1) provides front and side setback regulations. The manufacturing district regulations also require buffers for manufacturing use parcels contiguous to residential and open space districts. Additionally, the manufacturing district provides buffer regulations for fast-food establishments from residential districts, as well as buffers from other fast-food establishments except when they are located in shopping centers.

General Plan's Direction and Policies

This section provides the General Plan 2040 policies and actions that will be considered and taken into account when drafting the new setback and buffer development standards in the SMMC.

Commercial Development

Policy LU 3.2, Commercial Development, and Policy CD 8.3, Respect Existing Scale and Rhythm, address the incorporation of context-sensitive design and appropriate transition for new mixed-use and commercial developments. Policy LU 3.2 provides types of transition that include intensity of use, height, bulk, and design. Policy CD 8.3 also provides examples of context-sensitive design that include

providing breaks in the building face at spacings common to buildings in the area and stepping back upper floors.

To address these policies, the City will review Zoning Code changes for the current buffer requirements for the commercial, executive park, and manufacturing zoning districts in order to include new, clearer, and more comprehensive buffer requirements for new development next to residential areas. The CZCU will ensure that updates to standards are guided by context-sensitive design to facilitate appropriate transition from residential to commercial developments.

In addition, Policy LU 3.2 directs the City to ensure that "commercial development adjacent to residential areas appropriately address circulation, traffic, truck loading, trash/recycling, noise, visual impacts, public safety, hazardous materials storage, fire safety, air pollutant emissions, and odors in a way that minimizes impacts on neighboring uses." To address this, the CZCU will update standards to better address these topics in order to minimize impacts of commercial uses on neighboring uses. It will also be determined whether these additional buffer regulations will be incorporated within each district's regulations or be placed in a separate section that includes a list of performance standards that will apply to all zoning districts.

Action CD 8.7, Commercial Development Adjacent to Residential, directs the City to "Develop and adopt objective design standards that define and require appropriate design transitions from commercial to residential zones." The CZCU will develop objective design standards that include buffer regulations to ensure appropriate transition from commercial to residential zones.

Single-Family Design

Policy CD 7.2, Single-Family Design, directs the City to "encourage single-family additions and new dwellings that address the preservation and enhancement of neighborhood visual and architectural character through context-sensitive building scale, materials, architectural style and details, and privacy."

To address this policy, the CZCU will review Zoning Code changes for the current buffer and setback requirements for the single-family residential districts to ensure that single-family neighborhood visual character and privacy are preserved and enhanced.

State Law Compliance

There are currently no relevant state laws that address requirements for setbacks and buffers.

Best Practice Options and Considerations

This section outlines best practice options 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 Santa Clara County, City of Milpitas, and City of Stockton. The following considerations will help inform updates to the City's setback, buffer, and build-to-line regulations:

- For projects in the R1 and R2 Districts, Section 27.18.100 (Structures and Building Projections in Required Yards) provides the standards for permitted projections and encroachments into required setbacks. Relative to comparable jurisdictions (i.e., City of Stockton, City of Milpitas, and Santa Clara County), the City's existing projection regulations are a combination of being overly specific for the list of encroachments included and also broad for how they are regulated. For example, while garden ornaments and play equipment are explicitly permitted, the Section does not specify how far they may encroach into a setback. In contrast, comparable jurisdictions utilize broader categories of projection types while maintaining clear, specific distance limits for various setback types. For example, the City of Stockton includes "architectural features" as one broad category that covers balconies, chimneys, and window types. The City of Stockton and City of Milpitas use "ramps and similar structures that provide access for persons with disabilities," which could replace the City's existing encroachment type of "steps which are necessary to provide access to the first floor of a permitted building, or to a parcel from a street or alley" (Section 27.18.100(a)(8)). The CZCU will consider consolidating and modernizing the existing list of allowed encroachments by grouping similar types into broader categories and adding or removing types based on this review.
- As discussed above in the "City and Community's Goals" section, the current setback requirements in the SMMC might be overly restrictive. There are also some specific setback, buffer, and build-to-line provisions that are unique to the SMMC compared to zoning codes of comparable jurisdictions and would benefit from being standardized for ease of use and clarity. These regulations, such as determining interior side and street side (corner lot) setbacks according to project type (e.g., one-family detached dwellings) in the R3, R4, and R5 Districts and measuring setbacks based on measures such as half of the building or the size of the lot are not utilized as a measurement method in comparable jurisdictions and could pose challenges to development feasibility. The CZCU will consider updating the current setback regulations to increase development feasibility and improve the clarity of the regulations.
- The current setback, buffer, and build-to-line standards for all zoning districts are included in the Zoning Code as individual subsections and are written as short sentences or longer paragraphs. Including the standards in this manner increases the difficulty for readers of the Zoning Code. Instead, setback requirements will be included directly in tables for each zoning district to be more user-friendly.

- The current build-to-line regulations are currently specified only in the C1 District and are cross-referenced to apply across the C2, C3, and C4 Districts.[1] The current build-to-line regulations only apply to properties with frontage on El Camino Real from State Route 92 to the Belmont city limit and the Q5 (Qualified Overlay District 5) District, at the Hillsdale Shopping Center. Although most comparable jurisdictions do not include build-to-line regulations, the City of Sacramento includes build-to-line regulations that apply to their highest density residential, central business district, and hospital zones. The CZCU will consider reviewing the build-to-line to determine if the regulations will continue to apply to all commercial districts. The CZCU will also determine if build-to-line regulations will apply to the highest density residential zones.
- General Plan Policy LU 3.2, Commercial Development, will be referenced when updating buffer requirements for the commercial, executive park, and manufacturing zoning districts. The City will amend the current buffer requirements for new development next to residential areas to be clearer and more comprehensive. Additionally, based on this Policy, the CZCU will include updating existing and incorporating additional buffer regulations, including traffic, trash/recycling, and noise requirements, in order to minimize the impacts of commercial uses on neighboring uses. For these regulations, the CZCU will either incorporate these regulations within each district regulation or be placed in its own section with a list of performance standards applicable to all zoning districts. Based on a review of comparable jurisdictions, it is suggested to include these buffer regulations in one section. For example, the City of Stockton consolidates buffer requirements in one section in the Zoning Code, providing a clear, user-friendly format.

Potential Questions for Public Input

Questions that apply to all zoning districts:

- Question: Which of the following setback and/or standards most affect project feasibility in San Mateo? (Select all that apply.):
    - Front setbacks
    - Side or corner setbacks
    - Rear yard setbacks
    - Landscape buffer requirements
    - Not sure/no opinion

[1] The SMMC only refers to “build-to-lines" in the sections that address commercial zoning districts. In the Downtown Specific Plan area, functional build-to-lines are established for residential uses in the Gateway area with minimum and maximum setback distances defined. However, updates to the Downtown Specific Plan will not be a part of the CZCU.

- Question: The San Mateo Zoning Code includes setback requirements that may be too restrictive for certain project types. Which of the following alternative methods should be considered to provide greater flexibility for setbacks on a property?? (Select all that apply.):
    - Allow different setbacks based on lot size or shape
    - Allow small setback reductions (i.e., deviations) through an administrative review process
    - Allow certain building features, such as porches, to extend into setbacks
    - Replace minimum setbacks with an allowed build-to-line range for the front property setback
    - Other (Please specify.):

Low Density Residential Districts (R1 and R2)

Setback standards in low density residential districts help shape neighborhood character, provide privacy between homes, encourage landscaping and greenery, and manage transition between private and public spaces. The following questions inquire about existing standards and their applicability in the R1 and R2 Districts.

- Question: How effective do you think the current setback requirements are in supporting new development projects in low-density residential districts?:
    - Very effective, they provide clear guidance and allow flexibility for well-designed projects
    - Mostly effective, they work in most cases, but can be clarified or simplified
    - Somewhat effective, they are sometimes constraining but are developable
    - Not effective, they constrain the ability to develop
    - Not sure, I'm not familiar enough with the current regulations
- Question: Which of the following challenges do the current setback standards create in low-density residential districts? (Select all that apply.):
    - Inconsistent requirements across residential districts
    - Outdated or unclear calculation methods
    - Reduce maximum buildable area
    - No significant challenges come to mind
    - Not sure/no opinion

Medium- and High-Density Residential Districts (R3, R4, and R5)

In medium- and high-density residential districts, setback standards accommodate multi-family housing and manage building scale, lighting, and privacy. The following questions inquire about existing standards and their applicability in R3, R4, and R5 Districts.

- Question: How effective do you think the current setback requirements are in supporting new multifamily development projects in medium- and high-density residential districts?:
    - Very effective, they provide clear guidance and allow flexibility for well-designed projects
    - Mostly effective, they work in most cases, but can be clarified or simplified
    - Somewhat effective, they are sometimes constraining but are developable
    - Not effective, they constrain the ability to develop
    - Not sure, I'm not familiar enough with the current regulations
- Question: Which of the following challenges do the current setback standards create in medium- and high-density residential districts? (Select all that apply.):
    - Inconsistent requirements across residential districts
    - Outdated or unclear calculation methods
    - Reduce maximum buildable area
    - No significant challenges come to mind
    - Not sure/no opinion
- Question: The San Mateo Zoning Code uses an atypical method for determining interior side and street-side setbacks in the R3, R4, and R5 Districts, defining them by project type (e.g., one-family detached dwellings) instead of by property lines. If the City continues using a project-based approach to setback measurements, which development standards or methods should determine setback requirements? (Select all that apply.):
    - Building height measured in feet
    - Building height measured in the number of stories
    - Floor area ratio (FAR)
    - Lot coverage
    - Continue using project type
    - None of the above
    - Other (Please specify.):

Non-Residential Districts

Setback and buffer standards in non-residential districts help manage building placement, circulation, and transitions to nearby uses, including residential areas. The following questions inquire about current setback and buffer regulations for non-residential districts, including commercial and manufacturing districts.

- Question: How effective do you think the current setback requirements are in supporting functional and well-designed developments in non-residential districts?:

  - Very effective, they provide clear guidance and allow flexibility for well-designed projects
  - Mostly effective, they work in most cases, but can be clarified or simplified
  - Somewhat effective, they are sometimes constraining but are developable
  - Not effective, they constrain the ability to develop
  - Not sure, I'm not familiar enough with the current regulations
- Question: Which of the following challenges do the current setback standards create in non-residential districts? (Select all that apply.):
  - Inconsistent requirements across zoning districts
  - Outdated or unclear calculation methods
  - Reduce maximum buildable area
  - No significant challenges come to mind
  - Not sure/no opinion
- Question: How effective do you think the current buffer requirements are for supporting new development projects in non-residential districts?:
  - Very effective, they provide clear guidance and allow flexibility for well-designed projects
  - Mostly effective, they work in most cases, but can be clarified or simplified
  - Somewhat effective, they are sometimes constraining but are developable
  - Not effective, they constrain the ability to develop
  - Not sure, I'm not familiar enough with the current regulations
- Question: Which of the following challenges do the current buffer standards create? (Select all that apply.):
  - Inconsistent requirements between zoning districts
  - Outdated or unclear calculation methods
  - Reduce maximum buildable area
  - No significant challenges come to mind
  - Not sure/no opinion
- Question: Build-to-line standards (i.e., requiring buildings to be located close to the sidewalk) are uncommon in the comparable jurisdictions that were reviewed. How should San Mateo approach this type of standard?:
  - Keep or expand standards to encourage pedestrian-oriented development
  - Limit standards to certain commercial or mixed-use areas
  - Remove them to allow for more flexibility

- Not sure/no opinion

- Question: The San Mateo Zoning Code currently includes specific setback and build-to-line standards that pertain to El Camino Real. Based on your experience, please select the following options that describes these current regulations:
  - Very effective, they provide clear guidance and allow flexibility for well-designed projects
  - Mostly effective, they work in most cases, but can be clarified or simplified
  - Somewhat effective, they are sometimes constraining but are developable
  - Not effective, they constrain the ability to develop
  - Not sure, I'm not familiar enough with the current regulations
  - Other (Please specify.):