



October 20, 2025

Paul McDougall  
State Department of Housing and Community Development  
C/O Land Use and Planning Unit  
2020 W. El Camino Ave, Suite 500  
Sacramento, CA 95833

**RE: Submission of City of San Mateo 2023-2031 Housing Element Amendments**

Dear Mr. McDougall,

The City of San Mateo is pleased to submit amendments to its certified 2023-2031 Housing Element to the Department of Housing and Community Development (HCD) for review and confirmation of substantial conformance with State Law. In May 2024, the City adopted its 2023-2031 Housing Element, which was subsequently certified by HCD in July 2024. Following adoption of the Housing Element, the Housing Action Coalition (HAC) filed a lawsuit against the City, claiming that the Housing Element did not satisfy state law. In July 2025, the parties entered into a settlement agreement ("Settlement Agreement"). The City therein agreed to amend the Housing Element to remove certain sites from the opportunity sites inventory and not use them for the purposes of No Net Loss (see detailed descriptions below). The amendments also reflect the outcome of the November 2024 election, with voter approval of Measure T, which increased densities around the City by approximately 20,000 units. Since approval, the City has experienced a significant uptick in new development applications, with more than 5,000 residential units currently seeking City entitlement.

The Housing Element Amendments include some additional notable revisions that demonstrate the City's commitment to expanding housing production, meeting and exceeding our Regional Housing Needs Allocation (RHNA), and doing our part to address the region's housing needs. To minimize revisions, only the main Housing Element document and Appendix C includes amended text. All other Housing Element appendices that were adopted by the City and certified by HCD in July 2024 remain unchanged.

The Housing Element amendments were made available for public review and comment from **October 10, 2025, to October 17, 2025**. This seven-day public review period satisfies the requirement in AB 215 for the public to review and provide comments on housing element revisions. It was posted to the City's website and notifications were sent to individuals self-registered to the City's Housing Policy eNewsletter to ensure community awareness of the amendments. No public comments were received during this period. If additional comments are received after the conclusion of the required seven-day period, a supplemental attachment will be submitted to HCD to ensure that all public comments are available for HCD's consideration.

**Opportunity Sites Inventory Changes**

**Removal from the Sites Inventory**

Consistent with the Settlement Agreement, the opportunity sites inventory (Table 2 in Appendix C) was updated to remove the following eight sites:

1. The Bridgepointe Shopping Center Parking Lot (portion of APN 035-466-100)
2. 1826 and 1850 S. Norfolk St. (Parkside Plaza Shopping Center) (APNs 035-381-020 and -030)
3. 71-77 Bovet, and 1750 El Camino Real (Borel Shopping Cntr) (APNs 039-011-450, -460, -470, -480, -500, -510)
4. 229 W. 20th Ave., 205 W. 20<sup>th</sup> Ave., and 2010 Pioneer Court (Consolidated Site H) (APNs 039-052-350, 039-060-010, and 039-060-020)
5. 150 W. 20th Ave. (APN 039-030-220)
6. 4060 S. El Camino Real (Villa Plaza) (APN 042-241-180)
7. 5 N. San Mateo Dr., 123 Baldwin Ave., 117 Baldwin Ave., 26 N. San Mateo Dr., 27 N. San Mateo Dr. (Downtown Parking Lots) (APNs 032-312-250, -270, -150, -100 and -070)
8. 1311 S. El Camino Real (Bright Horizons Preschool) (APN 034-301-200)

However, if the property owner for any of these eight sites objects to its removal from the Sites Inventory, then that location will remain on the inventory but will not be counted for “No Net Loss” purposes, pursuant to the settlement agreement with HAC. This is what occurred with the Bel Mateo/ Olympic Shopping Center site (No. 4 in the list immediately below) which was originally planned for removal from the Sites Inventory. The City may receive additional requests from other property owners to remain on the Sites Inventory, and the City will add those sites back in the inventory, but will not count towards “No Net Loss”.

#### **Remaining on the Sites Inventory but not Counted for No Net Loss Purposes**

The following sites will remain on the opportunity sites inventory, but will not be used for “No Net Loss,” consistent with the Settlement Agreement:

1. 1500 Fashion Island Blvd. (County Office Building) (APN 035-550-040)
2. 1900 South Norfolk St. (The Atrium) (APN 035-391-090)
3. 1650 Borel Place (APN 039-011-400)
4. Bel Mateo/Olympic Shopping Center (APNs 042-242-050, -060, -070, -160; 042-243-020, 042-244-040, -050; 042-245-040, -050, -060, -070, -080, -090, -100, -110, -120, -130; 042-263-010, 042-264-010)

However, if any of the foregoing four sites become the subject of an SB 330 preliminary application or a formal development application, then the site may then be considered for “No Net Loss” purposes.

#### **Added to the Sites Inventory**

Since adoption of the Housing Element in May 2024, several applications for new residential development projects have been submitted to the City seeking planning entitlements for residential development and are now included as Pipeline Projects. These include the following sites:

1. 600 E 3<sup>rd</sup> Ave. (Gateway) (APN 034-188-140)
2. 230 S. El Camino Real (APN 034-093-050)
3. 1 E 4<sup>th</sup> Ave. (includes 15 E 4<sup>th</sup> Ave. and 25 E 4<sup>th</sup> Ave.) (APNs 034-143-260, -300, and -310)
4. 22 N. San Mateo Dr. (APN 032-321-340)
5. 2015 Pioneer Ct. (APN 039-060-860)
6. 3000 Clearview Way (APN 041-361-120)
7. Hillsdale Mall Sites (APNs 039-490-170, 039-353-010, -020, -030, and -040, 042-121-080 and -060)

In addition to these sites, the City has added the following sites as new opportunity sites to the inventory:

1. 1770 Amphlett Blvd. (former Marriott site) (035-241-220)
2. 2121 S. El Camino Real (includes 2163 S. El Camino Real) (APNs 039-073-490 and -500)

## **Other Sites Inventory Changes**

Some sites that were seeking planning entitlements and considered “Pipeline Projects” are no longer actively seeking those entitlements; therefore, they were removed as Pipeline Projects but remain as opportunity sites. In addition, some sites that were included as Pipeline Projects (with or without planning entitlement approvals) have resubmitted new applications for residential development projects with increased housing units. Those sites have been updated with the housing unit counts consistent with those new applications.

## **Measure T Voter Approval**

As previously stated, in November 2024, San Mateo voters approved Measure T, implementing Policy H1.20 of the Housing Element, which provided for focused growth near transit, the downtown, and other targeted areas, thereby increasing potential residential development capacity around the City by approximately 20,000 units. The Housing Element Amendments update language throughout the document accounting for the adoption of Measure T and removing language that addresses any potential actions to be taken in lieu of the passage of Measure T.

## **Realistic Capacities**

With the passage of Measure T, the densities of General Plan 2040 and the realistic capacities for many of the housing opportunity sites have been updated to account for the increased capacity from 50 dwelling units per acre to 99 or 130 dwelling units per acre. The opportunity sites inventory numbers in Appendix C and the Housing Element have been updated to reflect these increased capacities.

Also, since the update of General Plan 2040 and passage of Measure T, the City has received 14 preliminary/formal applications for residential development projects that largely take advantage of the increased densities and height limits in General Plan 2040. These new projects are being built at an average of 122% of base density. The City analyzed these recent projects along with other residential development projects previously analyzed and adjusted realistic capacities of each site from 75% to 90% of the base density depending on a project’s zoning district to 90% of the base density across all opportunity sites (for pipeline projects, the proposed unit count is used).

## **Other Amendments**

Other revisions in the Housing Element amendments include updates to Policy H 3.1 (Prevent Homelessness) to reflect the recently established emergency rental assistance program (\$200,000 annually) and minor updates to Policies H 1.2 (Utilize Public Funding and Properties for New Affordable Housing), H 3.4 (Expand Tenant Protections), and H 5.4.1 (Establish tenant protections in local ordinance), to align with current City budgetary needs and for internal consistency.

We are fully committed to working with HCD on these Housing Element Amendments and making any updates or revisions necessary to maintain compliance with state law. For any questions or to schedule a meeting to further discuss these proposed amendments, please contact Steve Golden, Principal Planner, at 650-522-7215 or [sgolden@cityofsanmateo.org](mailto:sgolden@cityofsanmateo.org).

Sincerely,



Zachary Dahl, AICP  
Community Development Director

### **Attachments:**

1. Revised 2023-2031 Housing Element (in track changes)
2. Appendix C - Housing Resources and Sites Inventory (in track changes)