

SAN MATEO COUNTY ASSESSMENT PRACTICES SURVEY

DECEMBER 2025

CALIFORNIA STATE BOARD OF EQUALIZATION

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December 30, 2025

TO COUNTY ASSESSORS:

YVETTE M. STOWERS
Executive Director

**SAN MATEO COUNTY
ASSESSMENT PRACTICES SURVEY**

No. 2025/043

A copy of the San Mateo County Assessment Practices Survey Report is enclosed for your information. The State Board of Equalization (BOE) completed this survey in fulfillment of the provisions of sections 15640–15646 of the Government Code. These code sections provide that the BOE shall make surveys in specified counties to determine that the practices and procedures used by the County Assessor in the valuation of properties are in conformity with all provisions of law.

The Honorable Mark Church, San Mateo County Assessor-County Clerk-Recorder & Chief Elections Officer, was provided a draft of this report and given an opportunity to file a written response to the findings and recommendations contained therein. The report, including the Assessor's response, constitutes the final survey report, which is distributed to the Governor, the Attorney General, and the State Legislature; and to the San Mateo County Board of Supervisors, Grand Jury, and Assessment Appeals Board.

Fieldwork for this survey was performed by the BOE's Assessment Practices Survey Division from January through March 2025. The report does not reflect changes implemented by the Assessor after the fieldwork was completed.

Mr. Church and staff gave their complete cooperation during the survey. We gratefully acknowledge their patience and courtesy during the interruption of their normal work routine.

Sincerely,

/s/ David Yeung

David Yeung
Deputy Director
Property Tax Department

DY:gdc
Enclosure

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INTRODUCTION

Although county government has the primary responsibility for local property tax assessment, the State has both a public policy interest and a financial interest in promoting fair and equitable assessments throughout California. The public policy interest arises from the impact of property taxes on taxpayers and the inherently subjective nature of the assessment process. The financial interest derives from state law that annually guarantees California schools a minimum amount of funding; to the extent that property tax revenues fall short of providing this minimum amount of funding, the State must make up the difference from the general fund.

The assessment practices survey program is one of the State's major efforts to address these interests and to promote uniformity, fairness, equity, and integrity in the property tax assessment process. Under this program, the State Board of Equalization (BOE) periodically reviews the practices and procedures (surveys) of specified County Assessors' offices. This report reflects the BOE's findings in its current survey of the San Mateo County Assessor-County Clerk-Recorder & Chief Elections Officer Office.¹

The Assessor is required to file with the board of supervisors a response that states the manner in which the Assessor has implemented, intends to implement, or the reasons for not implementing the recommendations contained in this report. Copies of the response are to be sent to the Governor, the Attorney General, the BOE, and the Senate and Assembly; and to the San Mateo County Board of Supervisors, Grand Jury, and Assessment Appeals Board. That response is to be filed within one year of the date the report is issued and annually thereafter until all issues are resolved. The Honorable Mark Church, San Mateo County Assessor-County Clerk-Recorder & Chief Elections Officer, elected to file their initial response prior to the publication of our survey; it is included in this report following the Appendices.

¹ This review covers only the assessment functions of the office.

OBJECTIVE

The survey shall "...show...the extent to which assessment practices are consistent with or differ from state law and regulations."² The primary objective of a survey is to ensure the Assessor's compliance with state law governing the administration of local property taxation. This objective serves the three-fold purpose of protecting the state's interest in the property tax dollar, promoting fair treatment of taxpayers, and maintaining the overall integrity and public confidence in the property tax system in California.

The objective of the survey program is to promote statewide uniformity and consistency in property tax assessment by reviewing each specified county's property assessment practices and procedures, and publishing an assessment practices survey report. Every Assessor is required to identify and assess all properties located within the county – unless specifically exempt – and maintain a database or "roll" of the properties and their assessed values. If the Assessor's roll meets state requirements, the county is allowed to recapture some administrative costs.

SCOPE AND METHODOLOGY

Government Code sections 15640 and 15642 define the scope of an assessment practices survey. As directed by those statutes, our survey addresses the adequacy of the procedures and practices employed by the Assessor in the valuation of property, the volume of assessing work as measured by property type, and the performance of other duties enjoined upon the Assessor.

Pursuant to Revenue and Taxation Code³ section 75.60, the BOE determines through the survey program whether a county assessment roll meets the standards for purposes of certifying the eligibility of the county to continue to recover costs associated with administering supplemental assessments. Such certification is obtained either by satisfactory statistical result from a sampling of the county's assessment roll or by a determination by the survey team – based on objective standards defined in regulation – that there are no significant assessment problems in the county.

This survey included an assessment sample of the 2023-24 assessment roll to determine the average level (ratio) of assessment for all properties and the disparity among assessments within the sample. The ideal assessment ratio is 100 percent, and the minimum acceptable ratio is 95 percent. Disparity among assessments is measured by the sum of absolute differences found in the sample; the ideal sum of absolute differences is 0 percent and the maximum acceptable number is 7.5 percent. If the assessment roll meets the minimum standards for ratio and disparity, the county is eligible to continue to recover the administrative cost of processing supplemental assessments.⁴

² Government Code section 15642.

³ Unless otherwise stated, all statutory references are to the California Revenue and Taxation Code and all rule references are to sections of California Code of Regulations, Title 18, Public Revenues.

⁴ The scope of our review of the assessment sampling program is provided on the BOE website at <https://www.boe.ca.gov/proptaxes/assessment-practices-survey-division/sampling.htm>.

Our survey methodology of the San Mateo County Assessor-County Clerk-Recorder & Chief Elections Officer Office included reviews of the Assessor's records, interviews with the Assessor and their staff, and contacts with officials in other public agencies in San Mateo County who provided information relevant to the property tax assessment program.

For a detailed description of the scope of our review of county assessment practices, please refer to the BOE's website at <https://www.boe.ca.gov/proptaxes/assessment-practices-survey-division/scope.htm>. Additionally, detailed descriptions of assessment practices survey topics, authoritative citations, and related information can be found at <https://www.boe.ca.gov/proptaxes/assessment-practices-survey-division/survey.htm>.

EXECUTIVE SUMMARY

This report offers recommendations to help the Assessor correct assessment problems identified by the survey team. The survey team makes recommendations when assessment practices in a given area are not in accordance with property tax law or generally accepted appraisal practices. An assessment practices survey is not a comprehensive audit of the Assessor's entire operation. The survey team does not examine internal fiscal controls or the internal management of an Assessor's office outside those areas related to assessment. In terms of current auditing practices, an assessment practices survey resembles a compliance audit – the survey team's primary objective is to determine whether assessments are being made in accordance with property tax law.

We examined the assessment practices of the San Mateo County Assessor's Office for the 2023-24 assessment roll.

During our survey, we conducted reviews of the following areas:

- Administration

We reviewed the Assessor's administrative policies and procedures that affect both the real property and business property assessment programs. Specific areas reviewed include budget and staffing, workload, assessment appeals, and exemptions. In the area of administration, the Assessor is effectively managing workload, assessment appeals, and exemptions.

- Assessment of Real Property

We reviewed the Assessor's program for assessing real property. Specific areas reviewed include properties having experienced a change in ownership, new construction assessments, declines in value, and certain properties subject to special assessment procedures, such as mineral property. In the area of real property assessment, we made recommendations for improvement in the change in ownership, new construction, declines in value, and mineral property programs.

- Assessment of Personal Property and Fixtures

We reviewed the Assessor's program for assessing personal property and fixtures. Specific areas reviewed include conducting audits, processing business property statements, and business equipment valuation. In the area of personal property and fixtures assessment, the Assessor has effective programs for conducting audits and processing business property statements. However, we made a recommendation for improvement in the business equipment valuation program.

Despite the recommendations noted in this report, we found most properties and property types are assessed correctly, and the overall quality of the assessment roll meets state standards.

The San Mateo County assessment roll meets the requirements for assessment quality as established by section 75.60. Our sample of the 2023-24 assessment roll indicated an average assessment ratio of 100.13 percent, and the sum of the absolute differences from the required assessment level was 0.28 percent. Accordingly, the BOE certifies that San Mateo County is eligible to receive reimbursement of costs associated with administering supplemental assessments.

OVERVIEW OF SAN MATEO COUNTY

San Mateo County is located in the western part of California and was created in 1856. The county encompasses a total area of 740.96 square miles, consisting of 448.41 square miles of land area and 292.55 square miles of water area. San Mateo County is bordered by San Francisco City and County to the north, Santa Clara County and the San Francisco Bay to the east, Santa Cruz County to the south, and the Pacific Ocean to the west.

As of 2023, San Mateo County has an estimated population of 726,353. There are 20 incorporated cities in San Mateo County. The county seat is Redwood City.

The San Mateo County local assessment roll ranks 9th in value of the 58 county assessment rolls in California.⁵



⁵ Statistics provided by the BOE Open Data Portal dataset - [County Assessed Property Values, by Property Class and County \(Table 7\)](#), for year 2023-24.

FINDINGS AND RECOMMENDATIONS

As noted previously, our review concluded that the San Mateo County assessment roll meets the requirements for assessment quality established by section 75.60. This report does not provide a detailed description of all areas reviewed; it addresses only the deficiencies discovered.

Following is a list of the formal recommendations contained in this report.

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RECOMMENDATION 3:	Include the value of excluded new construction in the full cash value estimate of a decline-in-value property.....	11
RECOMMENDATION 4:	Improve the mineral property program by: (1) properly classifying processing equipment of mineral property, and (2) measuring declines in value for mineral properties using the entire appraisal unit, as required by Rule 469.	11
RECOMMENDATION 5:	Apply the mobile agricultural equipment percent good factors prescribed in Table 6 of Assessors' Handbook Section 581, <i>Equipment and Fixtures Index, Percent Good and Valuation Factors</i> (AH 581), as intended.	13

ASSESSMENT OF REAL PROPERTY

Change in Ownership

Section 60 defines change in ownership as a transfer of a present interest in real property, including the beneficial use thereof, the value of which is substantially equal to the value of the fee simple interest. Sections 61 through 69.6 further clarify what is considered a change in ownership and what is excluded from the definition of a change in ownership for property tax purposes. Section 50 requires the Assessor to enter a base year value on the roll for the lien date next succeeding the date of the change in ownership; a property's base year value is its fair market value on the date of the change in ownership.⁶

Change in Ownership Exclusion – Parent-Child and Grandparent-Grandchild

Prior to February 16, 2021, section 63.1 generally excludes from the definition of "change in ownership" the purchase or transfer of a principal residence and the first \$1 million of other real property between parents and their children. Section 63.1 also excludes qualifying purchases or transfers from grandparents to their grandchildren if qualifying children of the grandparents are deceased as of the date of purchase or transfer.

To enforce the \$1 million limit for property of an eligible transferor, other than their principal residence, the BOE maintains a statewide database that lists transfers of such property. To further the state and local interests served by tracking these transfers, section 63.1 encourages County Assessors to report such transfers to the BOE on a quarterly basis. The quarterly reporting, which was formerly mandatory, is now optional. However, if an Assessor opts out of reporting quarterly transfer information to the BOE, the Assessor must track such transfers internally to be in compliance with section 63.1.

The BOE compiles the information provided by Assessors to generate quarterly reports notifying Assessors of any transferors who have exceeded their \$1 million limit. The data the BOE provides Assessors enables them to identify ineligible claims and, if necessary, take corrective action to ensure the \$1 million limit isn't exceeded.

However, effective September 30, 2021, Senate Bill 539 (Stats. 2021, Ch. 427) added section 63.2, which generally excludes from the definition of "change in ownership" the purchase or transfer of a principal residence or family farm occurring on and after February 16, 2021 between parents and their children. Section 63.2 also excludes qualifying purchases or transfers occurring on and after February 16, 2021 from grandparents to their grandchildren if qualifying children of the grandparents are deceased as of the date of purchase or transfer.

The transfer of a principal residence (family home) or each legal parcel of a family farm is subject to a value cap that is the sum of the property's factored base year value plus \$1 million. Section 2.1(c)(4) of article XIII A of the California Constitution and section 63.2 provides that

⁶ The scope of our review for the change in ownership topic is provided on the BOE website at <https://boe.ca.gov/proptaxes/change-in-ownership/>.

the \$1 million amount is to be adjusted every other year for inflation beginning on February 16, 2023.

In addition to the value limitation on the principal residence or family farm, section 63.2 eliminates the exclusion for other real property other than the principal residence or family farm. Therefore, the BOE will no longer have the need to maintain a statewide database that lists transfers of such property.

RECOMMENDATION 1: Reappraise all properties exceeding the \$1 million exclusion provided in section 63.1.

We found properties listed on the BOE's *Report of Transferors Exceeding \$1,000,000*, which the Assessor either failed to reappraise those portions exceeding the \$1 million limit or failed to report to the BOE the corrections necessary to resolve the issue.

Prior to February 16, 2021, section 63.1(a)(2) excludes from reassessment the purchase or transfer of the first \$1 million of full cash value of all real property, other than a principal residence, of an eligible transferor in the case of a purchase or transfer between parents and their children. Based on quarterly reports submitted by Assessors to the BOE listing approved section 63.1 transfer exclusions, the BOE tracks transferors and the properties transferred for each county in an effort to enforce the \$1 million limit. The BOE sends out a *Report of Transferors Exceeding \$1,000,000*, which lists the transferor and the properties that have been excluded. Assessors should review this list and report any necessary corrections to the BOE, such as duplicate submissions or errors in the value submitted. For those properties exceeding the limit, the Assessor should determine if a reassessment is valid and coordinate with the taxpayer and any other counties involved to make sure the exclusion is not granted on properties once the \$1 million limit has been exceeded. By allowing the exclusion of properties once the \$1 million limit has been exceeded, the Assessor is allowing certain properties to be excluded from reassessment that would otherwise be reassessable.

However, as stated previously, effective September 30, 2021, Senate Bill 539 (Stats. 2021, Ch. 427) added section 63.2, which eliminates the exclusion for other real property other than the principal residence or family farm. Therefore, the BOE will no longer have the need to maintain a statewide database that lists transfers of such property.

New Construction

Section 70 defines newly constructed property, or new construction, as (1) any addition to real property since the last lien date, or (2) any alteration of land or improvements since the last lien date that constitutes a major rehabilitation of the property or converts the property to a different use. Further, section 70 establishes that any rehabilitation, renovation, or modernization that converts an improvement to the substantial equivalent of a new improvement constitutes a major rehabilitation of the improvement. Section 71 requires the Assessor to determine the full cash value of newly constructed real property on each lien date while construction is in progress and

on its date of completion, and provides that the full cash value of completed new construction becomes the new base year value of the newly constructed property.⁷

RECOMMENDATION 2: Grant new construction exclusions for claims for disabled access improvements only upon compliance with section 74.6.

We found examples where the Assessor excluded from new construction assessment disabled access improvements constructed for the purpose of making a building or structure more accessible to, or more usable by, a disabled person without the information required by section 74.6.

For buildings other than owner-occupied dwellings, section 74.6 provides that "newly constructed" and "new construction" does not include the construction, installation, removal, or modification of any portion or structural component of an existing building or structure to the extent that it is done for the purpose of making the building or structure more accessible to, or more usable by, a disabled person. For this exclusion to apply, the following must be met: (1) the construction, installation, removal, or modification must be completed on or after June 7, 1994, to an existing building; (2) the work performed must be for the purpose of making the building more accessible to, or more usable by, a disabled person; and (3) the construction must not qualify for the construction exclusion provided by section 74.3(a).

To receive the exclusion, the following shall be submitted to the Assessor: (1) notification by the property owner prior to, or within 30 days of, completion of any project that the property owner intends to claim the exclusion for improvements making the building or structure more accessible to, or usable by, a disabled person; (2) a statement from the property owner, primary contractor, civil engineer, or architect identifying those portions of the project making building or structure more accessible to, or usable by, a disabled person; and (3) all documents necessary to support the exclusion, filed by the property owner, no later than six months after the completion of the project.

Form BOE-63-A facilitates this process. This form guides the property owner in providing the Assessor with the statements and certifications necessary to receive the exclusion. If the information required by section 74.6 is not provided, the Assessor is not authorized to exclude new construction from assessment for improvements intended to provide accessibility or usability for a disabled person.

Failure to obtain the necessary information required by section 74.6 may result in the Assessor granting exclusions for new construction that would otherwise be taxable.

Declines in Value

Section 51 requires the Assessor to enroll on the lien date an assessment that is the lesser of a property's factored base year value (FBYV) or its current full cash value, as defined in

⁷ The scope of our review for the new construction topic is provided on the BOE website at <https://boe.ca.gov/proptaxes/new-construction/>.

section 110. Thus, if a property's full cash value falls below its FBYV on any given lien date, the Assessor must enroll that lower value. If, on a subsequent lien date, a property's full cash value rises above its FBYV, then the Assessor must enroll the FBYV.⁸

RECOMMENDATION 3: Include the value of excluded new construction in the full cash value estimate of a decline-in-value property.

We found that when analyzing a property for a decline in value, the Assessor is not considering the value of excluded new construction in the full cash value estimate. For example, we found properties containing excluded solar new construction assessments that the Assessor did not value as part of the full cash value estimate to be compared to the property's FBYV.

Section 51 provides that the Assessor is to annually enroll the lower of a property's FBYV or its full cash value as of the lien date. Section 110 provides that "full cash value" is the amount of cash or its equivalent that a property would bring if exposed for sale on the open market. Letter To Assessors No. 2009/024 provides that when a property with excluded new construction sells, the excluded new construction becomes assessable, along with everything else on the property. Since an estimate of full cash value for decline in value purposes is made as if the property was exposed for sale, the full cash value should not be reduced by the value of any excluded new construction.

By not considering all the components of the property when determining the full cash value estimate, the Assessor may be underestimating the current market value of the property, causing incorrect assessments to be enrolled.

Mineral Property

By statute and case law, mineral properties are taxable as real property. They are subject to the same laws and appraisal methodology as all real property in the state. However, there are three mineral-specific property tax rules that apply to the assessment of mineral properties. They are Rule 468, *Oil and Gas Producing Properties*, Rule 469, *Mining Properties*, and Rule 473, *Geothermal Properties*. These rules are interpretations of existing statutes and case law with respect to the assessment of mineral properties.⁹

RECOMMENDATION 4: Improve the mineral property program by: (1) properly classifying processing equipment of mineral property, and (2) measuring declines in value for mineral properties using the entire appraisal unit, as required by Rule 469.

⁸ The scope of our review for the declines in value topic is provided on the BOE website at <https://boe.ca.gov/proptaxes/declines-in-value/>.

⁹ The scope of our review for the mineral property topic is provided on the BOE website at <https://boe.ca.gov/proptaxes/mineral-property/>.

Properly classify processing equipment of mineral property.

We reviewed the Assessor's valuation of business property associated with mineral properties and found that all business property is classified as personal property. Some of the property consists of conveyors and other processing equipment. This processing equipment is misclassified and should be classified as fixtures.

Rule 122.5 defines a fixture as "an item of tangible property, the nature of which was originally personalty, but which is classified as realty for property tax purposes because it is physically or constructively annexed to realty with the intent that it remain annexed indefinitely." "Annexed indefinitely" means "the item is intended to remain annexed until worn out, until superseded by a more suitable replacement, or until the purpose to which the realty is devoted has been accomplished or materially altered." The processing equipment associated with mineral appraisal units typically remains in the same place until operational needs require it to be moved somewhere else. As a fixture, this property has two values associated with it, the current market value and an adjusted base year value.

By not properly classifying processing equipment as fixtures, the Assessor will not be able to determine the value of the fixture as part of the appraisal unit.

Measure declines in value for mineral properties using the entire appraisal unit, as required by Rule 469.

We found that the Assessor does not combine the value of the land (other than reserves), improvements including fixtures, and reserves into a total value reflecting the total appraisal unit when determining whether to enroll the adjusted base year value or the current market value.

In accordance with article XIII A of the California Constitution, all real property receives a base year value and, on each lien date, the taxable value of the real property unit is the lesser of its adjusted base year value or current market value. Section 105 defines fixtures as a type of improvement and, hence, as real property.

For most properties, fixtures are treated as a separate appraisal unit for determining a decline in value. Mineral properties, however, are treated differently. Rule 469(e)(2)(C) specifically defines the appraisal unit of a mineral property to include land, improvements including fixtures, and reserves. The Assessor should use this unit for measuring possible declines in value.

Failure to properly determine the decline in value of a mineral property using the entire mineral property appraisal unit may lead to inaccurate assessments.

ASSESSMENT OF PERSONAL PROPERTY AND FIXTURES

Business Equipment Valuation

Assessors value most machinery and equipment using business property valuation factors. Some valuation factors are derived by combining price index factors with percent good factors, while other valuation factors result from valuation studies. Under this methodology, value for taxation purposes is established by multiplying a property's historical cost by an appropriate valuation factor.¹⁰

RECOMMENDATION 5: Apply the mobile agricultural equipment percent good factors prescribed in Table 6 of Assessors' Handbook Section 581, *Equipment and Fixtures Index, Percent Good and Valuation Factors* (AH 581), as intended.

When valuing agricultural mobile equipment, we found that the Assessor uses the Board-prescribed average percent good factors published in Table 6 of AH 581 for all agricultural mobile equipment, regardless of whether the taxpayer reported that the equipment was purchased "new" or "used".

Section 401.16(a)(2) allows the Assessor to average the new or used percent good factor tables for agricultural mobile equipment when the property owner does not indicate on the BPS whether the equipment is first acquired new or used. However, section 401.16(a)(1) states that when the condition is known, the Assessor may not average the published percent good factor tables to apply these factor tables to both classes of new and used property. Mobile equipment depreciates at different rates depending on its condition when purchased. In order to ensure the most accurate value indicator possible, appropriate valuation tables should be utilized when sufficient information is available. When the condition is known, the Assessor should apply the appropriate percent good factor tables.

By using average percent good factors on all agricultural mobile equipment, regardless of whether the condition at the time of purchase is known, the Assessor is failing to follow statute and may be enrolling incorrect assessments.

¹⁰ The scope of our review for the business equipment valuation topic is provided on the BOE website at <https://boe.ca.gov/proptaxes/business-equipment-valuation/>.

APPENDIX A: STATISTICAL DATA

Table 1: Assessment Roll

The following table displays pertinent information from the 2023-24 assessment roll.¹¹

	PROPERTY TYPE	ENROLLED VALUE
Secured Roll	Land	\$149,264,664,815
	Improvements	\$150,500,608,819
	Fixtures	\$1,314,277,120
	Personal Property	\$2,175,239,553
	Total Secured	\$303,254,790,307
Unsecured Roll	Land	\$481,072,117
	Improvements	\$3,432,950,383
	Fixtures	\$2,320,414,631
	Personal Property	\$8,593,104,986
	Total Unsecured	\$14,827,542,117
Exemptions¹²		(\$9,526,449,649)
	Total Assessment Roll	\$308,555,882,775

Table 2: Change in Assessed Values

The following table summarizes the change in assessed values over recent years:¹³

ROLL YEAR	TOTAL ROLL VALUE	CHANGE	STATEWIDE CHANGE
2023-24	\$308,555,883,000	6.8 %	6.7 %
2022-23	\$288,781,685,000	8.3 %	7.5 %
2021-22	\$266,632,642,000	4.1 %	4.1 %
2020-21	\$256,013,363,000	7.0 %	5.7 %
2019-20	\$239,284,713,000	7.1 %	6.1 %

¹¹ Statistics provided by BOE-822, *Report of Assessed Values by City, County 41* San Mateo, for year 2023.

¹² The value of the Homeowners' Exemption is excluded from the exemptions total.

¹³ Statistics provided by the BOE Open Data Portal dataset - [*County Assessed Property Values, by Property Class and County \(Table 7\)*](#).

Table 3: Gross Budget and Staffing

The Assessor's budget has grown from \$18,997,215 in fiscal year 2018-19 to \$27,171,423 in fiscal year 2022-23.

For fiscal year 2022-23, the Assessor had 114 budgeted permanent positions. This included the Assessor, Assistant Assessor, 7 managers, 56 real property appraisers, 16 business property auditor-appraisers, 3 drafting/mapping technicians, 10 computer programmers/analysts/technicians, and 20 support staff.¹⁴

The following table identifies the Assessor's budget and staffing over recent fiscal years:¹⁵

FISCAL YEAR	GROSS BUDGET	PERCENT CHANGE	PERMANENT STAFF
2022-23	\$27,171,423	3.8 %	114
2021-22	\$26,168,044	1.9 %	109
2020-21	\$25,687,903	13.8 %	109
2019-20	\$22,564,749	18.8 %	109
2018-19	\$18,997,215	17.6 %	88

Table 4: Assessment Appeals

The following table shows the number of assessment appeals filed in recent fiscal years:¹⁶

FISCAL YEAR	ASSESSMENT APPEALS FILED
2022-23	1,045
2021-22	1,125
2020-21	835
2019-20	699
2018-19	751

¹⁴ Statistics provided by the BOE Open Data Portal dataset – [Budgeted Permanent Positions](#).

¹⁵ Statistics provided by the BOE Open Data Portal datasets – [Gross and Net Budget](#) and [Budgeted Permanent Positions](#).

¹⁶ Statistics provided by the BOE Open Data Portal dataset – [Distribution of Assessment Appeals by Property Types](#).

Table 5: Exemptions – Welfare

The following table shows welfare exemption data for recent roll years:¹⁷

ROLL YEAR	WELFARE EXEMPTIONS	EXEMPTED VALUE
2023-24	1,270	\$6,907,006,565
2022-23	1,259	\$6,602,995,971
2021-22	1,401	\$5,976,696,858
2020-21	1,391	\$5,092,286,015
2019-20	1,391	\$4,836,104,004

Table 6: Change in Ownership

The following table shows the total number of transfer documents received and the total number of reappraisable transfers due to changes in ownership processed in recent roll years:¹⁸

ROLL YEAR	TOTAL TRANSFER DOCUMENTS RECEIVED	REAPPRAISABLE TRANSFERS
2023-24	20,501	8,308
2022-23	38,482	12,569
2021-22	30,090	8,751
2020-21	26,051	8,157
2019-20	31,565	10,677

¹⁷ Statistics provided by BOE-802, *Report on Exemptions*.

¹⁸ Statistics provided by the BOE Open Data Portal dataset – [Real Property Workload Data, Transfers](#).

Table 7: New Construction

The following table shows the total number of building permits received and the total number of new construction assessments processed in recent roll years.¹⁹

ROLL YEAR	TOTAL BUILDING PERMITS RECEIVED	NEW CONSTRUCTION ASSESSMENTS
2023-24	25,655	4,762
2022-23	31,405	4,056
2021-22	24,533	4,208
2020-21	15,282	4,210
2019-20	25,380	3,795

Table 8: Declines In Value

The following table shows the total number of decline-in-value assessments in recent roll years:²⁰

ROLL YEAR	DECLINE-IN-VALUE ASSESSMENTS
2023-24	8,139
2022-23	2,101
2021-22	2,260
2020-21	1,205
2019-20	1,143

¹⁹ Statistics provided by the BOE Open Data Portal dataset – [Real Property Workload Data, New Construction](#).

²⁰ Statistics provided by the BOE Open Data Portal dataset – [Real Property Workload Data, Proposition 8](#).

Table 9: Audits

The following table shows the minimum number of audits required to be conducted and the total number of audits completed in recent fiscal years.²¹

MINIMUM NUMBER OF AUDITS REQUIRED ²²	2022-23	2021-22	2020-21	2019-20	2018-19
Largest Assessments					108
All Other Taxpayers					109
Total Required					217
NUMBER OF AUDITS COMPLETED					
Total Audits Completed	251	238	233	174	161
Largest Assessments	145	99	124	80	95
Over/(Under) Required					(13)
All Other Taxpayers	106	139	109	94	66
Over/(Under) Required					(43)
CCCASE AUDITS					
Prepared for other county Assessors	0	4	8	33	19

²¹ Statistics provided by the BOE Open Data Portal dataset – [Business Property Workload Data, Audits](#).

²² See Letter To Assessors (LTA) No. 2009/049, *Significant Number of Business Property Audits*, for the minimum number of annual audits required pursuant to the provisions of section 469 for year 2018-19. Effective January 1, 2019, section 469 was amended to give Assessors more flexibility in completing the number of audits by allowing for the four-year total of required annual audits to be completed within a four-year period of time, rather than annually, beginning with the 2019-20 fiscal year. For more information on the amendments to section 469, see LTA No. 2018/067.

APPENDIX C: RELEVANT STATUTES AND REGULATIONS

Reference	Description
<i>Government Code</i>	
§15640	Survey by board of county assessment procedures.
§15641	Audit of records, appraisal data not public.
§15642	Research by board employees.
§15643	When surveys to be made.
§15644	Recommendations by board.
§15645	Survey report, final survey report, Assessor's report.
§15646	Copies of final survey reports to be filed with local officials.
<i>Revenue and Taxation Code</i>	
§75.60	Allocation for administration.
<i>Title 18, California Code of Regulations</i>	
Rule 371	Significant assessment problems.

ASSESSOR'S RESPONSE TO BOE'S FINDINGS

Section 15645 of the Government Code provides that the Assessor may file with the Board a response to the findings and recommendations in the survey report. The survey report, the Assessor's response, and the BOE's comments regarding the Assessor's response, if any, constitute the final survey report.

The San Mateo County Assessor's response begins on the next page. The BOE has no comments regarding the response.



OFFICE OF
**ASSESSOR-COUNTY CLERK-
RECORDER & ELECTIONS**
COUNTY OF SAN MATEO

MARK CHURCH
ASSESSOR-COUNTY CLERK-
RECORDER & CHIEF ELECTIONS OFFICER

November 3, 2025

David Yeung, Deputy Director
State Board of Equalization
Property Tax Department, MIC 63
P.O. Box 942879
Sacramento, CA 94279-0064

Re: Assessment Practices Survey
BOE Recommendations and San Mateo County Responses

Dear Deputy Director Yeung:

Pursuant to Section 15645 of California Government Code, I have attached my response to the State Board of Equalization's 2023 Assessment Practices Survey Report for San Mateo County and ask that you include my response in the published survey.

I would like to express my appreciation to the State Board of Equalization survey team, led by Alexander Fries, for their professional and collaborative approach throughout the review process. The periodic survey of assessors' assessment practices is an invaluable, useful and constructive tool. The recommendations are appreciated, as we foster continuous improvement to our assessment program.

Furthermore, I want to acknowledge the unwavering dedication and hard work of our staff within the San Mateo County Assessor's Office, whose commitment is instrumental in ensuring fair, transparent, and equitable assessment practices for all property owners in San Mateo County.

Sincerely,

Mark Church

**SAN MATEO COUNTY RESPONSES TO STATE BOARD OF EQUALIZATION
2023 ASSESSMENT PRACTICES SURVEY RECOMMENDATIONS**

Recommendation 1: Reappraise all properties exceeding the \$1 million exclusion provided in Section 63.1.

Response: We concur. We have implemented new training, protocols, and oversight into our internal review of these claims.

Recommendation 2: Grant new construction exclusions for claims for disabled access improvements only upon compliance with Section 74.6.

Response: We concur. We have established a procedure to identify compliance with Section 74.6 prior to granting new construction exclusions for claims for disabled access improvements.

Recommendation 3: Include the value of excluded new construction in the full cash value estimate of a decline-in-value property.

Response: We concur. We will improve our new Assessor Property Assessment System (APAS) to better identify excluded new construction, such as active solar energy systems, into our database.

Recommendation 4: Improve the mineral property program by: (1) properly classifying processing equipment of mineral property, and (2) measuring declines in value for mineral properties using the entire appraisal unit, as required by Rule 469.

Response: We concur and will implement this recommendation.

Recommendation 5: Apply the mobile agricultural equipment percent good factors prescribed in Table 6 of Assessors' Handbook Section 581, *Equipment and Fixtures Index, Percent Good and Valuation Factors* (AH 581), as intended.

Response: We concur and have implemented this recommendation.