

**COUNTY OF SAN MATEO
PLANNING AND BUILDING DEPARTMENT**

DATE: April 10, 2024

TO: Planning Commission

FROM: Planning Staff

SUBJECT: Consideration of an Initial Study/Negative Declaration and recommendation to the Board of Supervisors regarding adoption of a resolution to adopt the County's 2023-2031 Housing Element of the General Plan, in compliance with State law.

PROPOSAL

County staff has prepared a revised update to the General Plan Housing Element that responds to comments received on the previously submitted update from the Department of Housing and Community Development (HCD), as well as an Initial Study/Negative Declaration pursuant to the California Environmental Quality Act (CEQA).

RECOMMENDATIONS

1. Recommend that the Board of Supervisors adopt the Initial Study and Negative Declaration.
2. Recommend that the Board of Supervisor adopt the resolution adopting the County's 2023-2031 Housing Element of the General Plan, in compliance with State law.

BACKGROUND

Report Prepared By: William Gibson

Appellant: N/A

Applicant: Planning and Building Department

Owner: N/A

Public Notification: Notice of hearing was published in the San Mateo County Times

Location: Countywide

Environmental Evaluation: Adoption of the updated Housing Element is a project requiring environmental review under the California Environmental Quality Act. The County prepared an Initial Study and Negative Declaration for the Housing Element, as required by the California Environmental Quality Act. The Initial Study and Negative Declaration determined that, as a programmatic document that does not directly impact the environment absent subsequent implementation actions which will require evaluation independently pursuant to CEQA as they are implemented, adoption of the Housing Element has no potential environmental impacts. Subsequent implementation of some programs in the Housing Element will require additional environmental review, which will take place as those programs are implemented. The [Initial Study](#) and [Negative Declaration](#) were circulated for public review between May 3 and June 9, 2023. Subsequent changes to the draft Housing Element have not added any programs or actions that have environmental impacts absent further action that may require independent environmental assessment, and do not alter the scope or determination of the Initial Study and Negative Declaration, and no additional environmental assessment is required. The Initial Study and Negative Declaration will be presented to the Board of Supervisors for adoption concurrent with consideration of the adoption of the updated Housing Element.

DISCUSSION

1. The Housing Element. The Housing Element is a required component of the County's General Plan, mandated by State Law. State law also mandates specific contents of the Housing Element, which include:
 - a. Identification of existing and projected housing needs for all segments of the community.
 - b. Goals, policies, quantified objectives and scheduled programs to address housing needs.
 - c. Identification of developable or redevelopable sites to meet the County's fair share of regional housing needs at all income levels over the next eight years.
 - d. An assessment of constraints on the development of housing.
 - e. An evaluation of the existing Housing Element.
 - f. New in this housing element cycle, a specific assessment of how the County's housing policies, programs and identified sites for development affirmatively further fair housing (AFFH).

The County's current Housing Element, Chapter 7 of the General Plan, is [here](#).

2. The Housing Element Update. State law requires all local jurisdictions to periodically update the Housing Element of their General Plan, on a schedule established by the state. The current Housing Element covers the period from 2014 to 2022. The updated Housing Element will, on adoption, replace the existing Housing Element, and cover the period from 2023 to 2031.
3. California Department of Housing and Community Development (HCD) Review and Comment. The County is required to submit the updated Housing Element to HCD for HCD's review of its compliance with State law.

On recommendation of the Planning Commission and direction of the Board of Supervisors, the County submitted its updated Housing Element to HCD on January 20, 2023. The Department of Housing and Community Development responded with a comment letter on April 20, 2023, determining that the Housing Element was not in compliance with State law, and recommending a number of changes to bring the Housing Element into compliance. The Department of Housing and Community Development's comment letter is included as *Attachment B*.

Since receipt of HCD's comment letter, the County has revised the update in a manner that will ensure compliance with State law. The County completed its updates to the Housing Element in response to HCD and released the updated draft Housing Element on March 26, 2024.

4. Collaborative Update Process. The revisions to the draft Housing Element in response to HCD's comments were completed in collaboration with the Housing Department, Office of Sustainability, Department of Health, Office of Community Affairs, and other partners. In addition, the County relied on the assistance of multiple consultants, including Community Planning Collaborative, Economic and Planning Systems, and Root Policy. The Association of Bay Area Governments (ABAG) also provided significant technical assistance to all Bay Area jurisdictions.
5. Adoption Process. On adoption, the 2023-2031 Housing Element will replace the current Housing Element of the General Plan, constituting a General Plan text amendment, enacted by resolution of the Board of Supervisors.
6. Public Outreach, Participation and Input in the Housing Element Update. During the initial process of updating the Housing Element prior to submittal to HCD, the County engaged in a significant outreach and input process, to solicit robust participation and comment from community members, stakeholders, partner agencies, advocacy organizations, and other interested parties. The outreach and engagement process are described in Appendix F of the Housing Element. During the process of amending the Housing Element in response to HCD's comments, the County has continued to engage in dialogue with stakeholders and community members, to ensure that the Housing Element is not only responsive

to HCD's comments and compliant with State law but to ensure the Housing Element meets the needs and goals of community members and the County.

7. Amended Draft 2023-2031 Housing Element. The full content of the draft 2023-2031 San Mateo County Housing Element is available [here](#). Changes made subsequent to submittal to and response from HCD are shown in red text throughout the amended Housing Element. An inventory of the changes in response to HCD, and additional changes incorporated to address identified housing needs, is included as *Attachment C*. Changes incorporated in this updated draft include:
- a. Additional data and analysis of housing conditions, housing constraints, housing needs.
 - b. Additional information and description of County regulations and policies.
 - c. More specificity and more detailed timelines, goals, milestones and objectives for Housing Element programs.
 - d. More detailed information on County's compliance with various state law.
 - e. A new Rural South Coast Housing Study and Strategy.
 - f. A comprehensively updated Farm Labor Housing Study and Strategy.
 - g. An initial study of a Community Plan for Pescadero.
 - h. A site-by-site assessment of the feasibility of developing farm labor housing in the County's Coastal Zone.
 - i. A commitment to encouraging the use of local labor and providing publicly available labor resources.
 - j. Creation of an ADU resource center to facilitate and incentivize the creation of accessory dwelling units.
 - k. Various other expanded programs committing to development of housing and housing assistance to various special needs populations, including farm laborers, the homeless, low-income seniors, large families, and female-headed households.

The most substantive changes are 1) a comprehensively revised Sites Inventory and Rezoning Program, demonstrating that the County has sufficient developable sites to meet its share of regional housing need over the next 8 years, and 2) a more robust analysis fair housing issues and incorporation of new fair housing programs.

8. Sites Inventory and Rezoning Program. The amended Housing Element includes a comprehensive revision of the Sites Inventory and Rezoning Program, demonstrating County’s ability to meet Regional Housing Needs Allocation (RHNA). The updated Sites Inventory and Rezoning Program are based on significant new analysis of recent development patterns, trends, and types to justify development feasibility projections, resulting in changes to projections of development and redevelopment of existing sites, and an expansion of rezoning program to include more sites in more County areas, at greater densities. The resulting projected development capacity in comparison to the County’s RHNA is shown below. The locations of sites in the Sites Inventory and Rezoning Program are included as *Attachment D*, and can be viewed through the County’s Sites Inventory Viewer, [here](#).

RHNA vs DEVELOPMENT CAPACITY

Income Category	RHNA	Vacant SFR	Vacant MFR	Non-Vacant MFR	Pipeline (RHNA Credits)	ADUs	Rezoning Program	Total Units	Surplus/ (Deficit)
Very Low	811	0	23	253	254	0	619	1,149	339
Low	468	0	23	253	196	60	619	1,151	684
Moderate	433	0	23	253	44	120	619	1,059	627
Above Moderate	1,121	387	27	253	147	60	619	1,459	373
Total	2,833	387	98	1,011	641	240	2,477	4,854	2,021

Appendix E of the Housing Element includes the full Adequate Sites Inventory and Rezoning Program methodology, including a detailed inventory and description of developable and redevelopable sites; units that will be created by projects already underway; projected future development of ADUs; and, development capacity that will be created through rezoning of identified sites. The combination of these categories demonstrates that the County has sufficient capacity to meet its 2023-2031 RHNA, in total and by income level.

9. Fair Housing Analysis and Programs. Fair housing is the condition in which all residents, regardless of race, ethnicity, gender, income, class, sexual orientation, ability status, or other status have equal access to housing. The County’s assessment of fair housing issues is included in the Housing Element in Appendix G, and the County’s fair housing programs are found throughout the Housing Plan in Section 2 of the Housing Element and are aggregated in the fair housing plan in Appendix G-5.

In response to HCD's comments on the fair housing components of the County's Housing Element, the County revised and expanded its analysis of fair housing issues. Changes include:

More analysis and description of:

- a. Integration and segregation, disparities in opportunity.
- b. Areas of racially concentrated poverty and affluence.
- c. Displacement risks, particularly from natural disaster.
- d. Homelessness, other special needs populations.
- e. Fair housing implications of the Sites Inventory and Rezoning Program.

In response to HCD's comments and the findings of the expanded analysis, several new fair housing programs have been added to the Housing Element, including:

- a. Consolidation and publication of fair housing resources.
- b. Dedication of federal and local funds to fair housing assistance enforcement.
- c. Expansion and targeting of housing funding to special needs populations.
- d. Funding for large family households.
- e. Funding for affordable housing linked to childcare.
- f. Various programs supporting development of farm labor housing.
- g. Develop multilingual regional online affordable housing program.
- h. Submission of Equity Plan to the Federal Department of Housing and Urban Development.

10. Next Steps. The Housing Element will be available for public comment from March 26 until the Board hearing, and any comments received will be presented to the Planning Commission and Board of Supervisors for consideration. The proposed schedule for review and adoption is as follows:

Public notification:	March 27 – 30, 2024
Planning Commission hearing:	April 10, 2024
Board of Supervisors hearing:	April 24, 2024
Resubmittal to HCD	Week of April 24, 2024

ATTACHMENTS

- A. Recommendation
- B. HCD Comment Letter, April 20, 2023
- C. Inventory of Housing Element Changes
- D. Sites Inventory and Rezoning Program Maps
- E. Initial Study and Negative Declaration
- F. Draft Resolution Adopting 2023-2031 Housing Element
- G. Draft Resolution Adopting Negative Declaration for the Housing Element
- H. Draft 2023-2031 Housing Element: Introduction and Executive Summary

County of San Mateo
Planning and Building Department

RECOMMENDATION

Permit or Project File Number: N/A

Hearing Date: April 10, 2024

Prepared By: William Gibson

For Adoption By: Planning Commission

RECOMMENDATION

1. Recommend that the Board of Supervisors adopt the Initial Study and Negative Declaration for the County's 2023-2031 Housing Element; and
2. Recommend that the Board of Supervisors adopt the resolution adopting the County's 2023-2031 Housing Element of the General Plan, in compliance with State law.



County of San Mateo - Planning and Building Department

ATTACHMENT B

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT**

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Sacramento, CA 95833
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April 20, 2023

Steve Monowitz, Director
Community Development Department
County of San Mateo
455 County Center, 2nd floor
Redwood City, CA 94063

Dear Steve Monowitz:

RE: County of San Mateo's 6th Cycle (2023-2031) Draft Housing Element

Thank you for submitting the County of San Mateo's (County) draft housing element received for review on January 20, 2023. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review. In addition, HCD considered comments from Housing Leadership Council and Public Advocates, pursuant to Government Code section 65585, subdivision (c).

The draft element addresses many statutory requirements; however, revisions will be necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code). The enclosed Appendix describes the revisions needed to comply with State Housing Element Law.

As a reminder, the County's 6th cycle housing element was due January 31, 2023. As of today, the County has not completed the housing element process for the 6th cycle. The County's 5th cycle housing element no longer satisfies statutory requirements. HCD encourages the County to revise the element as described above, adopt, and submit to HCD to regain housing element compliance.

For your information, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), if a local government fails to adopt a compliant housing element within 120 days of the statutory deadline (January 31, 2023), then any rezoning to make prior identified sites available or accommodate the regional housing needs allocation (RHNA) shall be completed no later than one year from the statutory deadline pursuant to Government Code sections 65583, subdivision (c) and 65583.2, subdivision (c). Otherwise, the local government's housing element will no longer comply with State Housing Element Law, and HCD may revoke its finding of substantial compliance pursuant to Government Code section 65585, subdivision (i). Please be aware, if the County fails to adopt a

compliant housing element within one year from the statutory deadline, the element cannot be found in substantial compliance until these rezones are completed.

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the County should continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available and considering and incorporating comments where appropriate. Please be aware, any revisions to the element must be posted on the local government's website and to email a link to all individuals and organizations that have previously requested notices relating to the local government's housing element at least seven days before submitting to HCD.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant; the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities programs; and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the County will meet housing element requirements for these and other funding sources.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the County to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at: <https://www.opr.ca.gov/planning/general-plan/guidelines.html>.

HCD is committed to assist the County in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Anthony Errichetto, of our staff, at Anthony.Errichetto@hcd.ca.gov.

Sincerely,



Paul McDougall
Senior Program Manager

Enclosure

APPENDIX COUNTY OF SAN MATEO

The following changes are necessary to bring the County's housing element into compliance with Article 10.6 of the Government Code. Accompanying each recommended change, we cite the supporting section of the Government Code.

Housing element technical assistance information is available on HCD's website at <https://www.hcd.ca.gov/planning-and-community-development/hcd-memos>. Among other resources, the housing element section contains HCD's latest technical assistance tool, *Building Blocks for Effective Housing Elements (Building Blocks)*, available at <https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks> and includes the Government Code addressing State Housing Element Law and other resources.

A. Review and Revision

Review the previous element to evaluate the appropriateness, effectiveness, and progress in implementation, and reflect the results of this review in the revised element. (Gov. Code, § 65588 (a) and (b).)

While the element describes results of the prior element's programs, it must also evaluate the effectiveness of prior programs and then add or modify current programs as appropriate based on the evaluation.

In addition, the element must provide an evaluation of the cumulative effectiveness of past goals, policies, and related actions in meeting the housing needs of special needs populations (e.g., elderly, persons with disabilities, large households, female-headed households, farmworkers, and persons experiencing homelessness) and revise programs as appropriate.

B. Housing Needs, Resources, and Constraints

1. *Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2...shall include an assessment of fair housing in the jurisdiction. (Gov. Code, § 65583, subd. (c)(10)(A).)*

Enforcement and Outreach: The element provides a discussion on community outreach conducted, but it must also describe the process to refer fair housing complaints and how the County complies with federal and state fair housing laws.

Integration and Segregation: While the element discusses some patterns and trends within the County related to persons with disabilities and household incomes, it should also compare the County to the broader region for these factors. In addition, the element should describe patterns and trends for familial status within the County

(comparing different areas of the County) and at a regional level (comparing the County to the broader region). Lastly, the element should analyze what contributes to the identified segregation of race within the County to better formulate appropriate policies and programs. For example, the analysis of patterns and trends should incorporate local data and knowledge and other relevant factors (See below) to refine the fair housing issues and formulate an appropriate and impactful policy and program.

Racial/Ethnic Areas of Concentration of Poverty (R/ECAP) and Racially Concentrated Area of Affluence (RCAA): While the element states where R/ECAPs are located within the County, it must provide specific analysis of conditions and circumstances. The analysis should address trends, coincidence with other fair housing issues (segregation and integration, access to opportunities, disproportionate impacts), neighborhood conditions (e.g., housing, infrastructure, circulation, parks, community facilities and amenities) and compare overall quality of life to other areas of the County. Then, the element should formulate significant and meaningful policies and programs, including but not limited to place-based strategies toward community revitalization and mitigation of displacement risk. Similarly, the element must analyze the RCAAs. The analysis should consider coincidence with other fair housing issues, discuss the presence of RCAAs relative to the broader region and incorporate local data and knowledge and other relevant factors such as zoning and land use practices or lack of investment or other policies to promote affordable housing. Then, the element should include significant and meaningful actions to promote housing mobility and new housing opportunities in higher opportunity, higher income and concentrated areas of affluence to facilitate more inclusive neighborhoods.

Disparities in Access to Opportunity: While the element provides an analysis of patterns and trends within the County (local analysis), it must be revised to include a regional analysis (comparing the County to the broader region) for education, economy, and environment. In addition, the element should describe whether there is equal access to transit throughout the County, including unincorporated areas and provide a regional analysis. The element should also describe what factors contribute to low education scores and job access within unincorporated areas.

Disproportionate Housing Needs Including Displacement: The element should provide a regional analysis for cost burden and overcrowding. In addition, the element must describe any concentration of substandard housing both locally and regionally. The element should also clarify whether the most recent Point in Time (PIT) count for persons experiencing homelessness is representative of the County. The element must also describe and analyze areas sensitive to displacement, including displacement risk due to disaster (e.g., earthquake, fire, and flood).

Identified Sites and Affirmatively Furthering Fair Housing (AFFH): The element must include a locational analysis (neighborhood by neighborhood) of the regional housing needs allocation (RHNA) by income group and evaluate the impact of identified sites in each area. While the element analyzed identified sites against some fair housing factors, the element must identify whether sites improve or exacerbate fair housing issues in the County. A full analysis should address the income categories of identified

sites with respect to location, the number of sites and units by all income groups, and how that affects the existing patterns for all components of the assessment of fair housing (e.g., segregation and integration, access to opportunity). If sites exacerbate conditions, the element should identify further program actions that will be taken to promote equitable quality of life throughout the community (e.g., anti-displacement and place-based community revitalization strategies).

Other Relevant Factors: To complete an analysis, the element must complement state and federal data and mapping with other relevant factors that contribute to fair housing issues in the jurisdiction. Other relevant factors should be incorporated into the discussion of socio-economic patterns. For instance, the element can analyze historical land use and investment practices and how that influenced fair housing issues. For more information, please see HCD's AFFH Guidance Memo at <https://www.hcd.ca.gov/planning-and-community-development/affirmatively-furthering-fair-housing>.

Contributing Factors: The element identifies many contributing factors to fair housing issues. Based on a complete analysis, the element must re-assess and particularly prioritize these factors to better formulate policies and programs and carry out significant and meaningful actions.

- 2. Include an analysis and documentation of household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding, and housing stock condition. (Gov. Code, § 65583, subd. (a)(2).)*

Housing Stock Condition: While the element states that the need for housing rehabilitation and replacement has increased since the last housing element, it must include an estimate of the number of units in need of rehabilitation and replacement. For example, the analysis could include estimates from a recent windshield survey or sampling, estimates from the code enforcement agency, or information from knowledgeable builders/developers, including nonprofit housing developers or organizations.

Housing Costs: While the element includes estimated rents for residents, it utilizes American Community Survey (ACS) data. The element should supplement census data with other sources (e.g., Zillow, apartments.com).

- 3. An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)*

Progress in Meeting the RHNA: The County's RHNA may be reduced by the number of new units built since June 30, 2022; however, the element must demonstrate their affordability based on actual sales price, rent level, or other mechanisms ensuring affordability (e.g., deed restrictions). The element should also discuss the status, any

barriers to development and other relevant factors to demonstrate their availability in the planning period.

Realistic Capacity: While the element states that realistic capacity is based on recent trends, it must state what the actual assumptions are in each zone. The element should demonstrate what specific trends, factors, and other evidence led to the assumptions. The estimate of the number of units for each site must be adjusted as necessary, based on the land use controls and site improvements, typical densities of existing or approved residential developments at a similar affordability level in that jurisdiction, and on the current or planned availability and accessibility of sufficient water, sewer, and dry utilities. The element also needs to analyze the likelihood that the identified units will be developed as noted in the inventory in zones that allow 100 percent nonresidential uses (e.g., mixed-use). This analysis should consider the likelihood of nonresidential development, performance standards, and development trends supporting residential development.

In addition, the element appears to assume residential development on sites with zoning that allows 100 percent nonresidential uses, but to support this assumption, the element must analyze the likelihood of residential development in zoning where 100 percent nonresidential uses are allowed. The analysis should be based on factors such as development trends including nonresidential, performance standards requiring residential uses or other relevant factors such as enhanced policies and programs.

Suitability of Nonvacant Sites: The element must include an analysis demonstrating the potential for redevelopment of nonvacant sites. The description of existing uses should be sufficiently detailed to facilitate an analysis demonstrating the potential for additional development in the planning period. In addition, the element must analyze the extent that existing uses may impede additional residential development. For example, the element includes sites identified as commercial, parking, and residential; but must also demonstrate whether these existing uses would impede development of these sites within the planning period. The element can summarize past experiences converting existing uses to higher density residential development, include current market demand for the existing use, provide analysis of existing leases or contracts that would perpetuate the existing use or prevent additional residential development and include current information on development trends and market conditions in the County and relate those trends to the sites identified. The element could also support, based on recent development trends, indicators such as age and condition of the existing structure, expressed developer interest, existing versus allowable floor area, low improvement to land value ratio, and other factors.

In addition, as noted in the housing element, the housing element relies upon nonvacant sites to accommodate more than 50 percent of the RHNA for lower income households. For your information, the housing element must demonstrate existing uses are not an impediment to additional residential development and will likely discontinue in the planning period (Gov. Code, § 65583.2, subd. (g)(2)). Absent findings (e.g., adoption resolution) based on substantial evidence, the existing uses will be presumed to impede

additional residential development and will not be utilized toward demonstrating adequate sites to accommodate the RHNA.

Small Sites: Sites smaller than a half-acre in size are deemed inadequate to accommodate housing for lower-income housing unless it is demonstrated that sites of equivalent size and affordability were successfully developed during the prior planning period or unless the housing element describes other evidence to HCD that the site is adequate to accommodate lower-income housing (Gov. Code, § 65583.2, subd. (c)(2)(A).). The element lists small sites and states the sites are suitable but must also evaluate whether those sites are suitable to accommodate housing for lower income households and add or modify programs as appropriate. For example, the element could list past consolidations by the number of parcels, number of owners, zone, number of units, affordability and circumstances leading to consolidation and then relate those trends to the identified sites or could explain the potential for consolidation on a site-by-site basis.

SB 9 Sites: The element identifies SB 9 as a strategy to accommodate the part of the County's need of moderate and above-moderate RHNA. To support these assumptions, the analysis must include experience, trends and market conditions that allow lot splits and missing middle uses. The analysis must list the potential SB 9 sites and demonstrate the likelihood of redevelopment, including whether existing uses constitute as an impediment for additional residential use. The analysis should describe how the County determined eligible properties, whether the assumed lots will have turnover, if the properties are easy to subdivide, and the condition of the existing structures. The analysis should also describe interest from property owners as well as experience. The analysis should provide support for the units assumed to be developed within the planning period. Based on the outcomes of this analysis, the element should add or modify to establish zoning and development standards early in the planning period and implement incentives to encourage and facilitate development as well as monitor development every two years with and identify additional sites within six months if assumptions are not being met. The element should support this analysis with local information such as local developer or owner interest to utilize zoning and incentives established through SB 9.

Replacement Housing Requirements: Generally, if the sites inventory identifies sites with existing residential uses that meet specific conditions, the element should include a program for replacement housing. Absent a replacement housing program, these sites are not adequate sites to accommodate lower-income households. The replacement housing program has the same requirements as set forth in Government Code section 65915, subdivision (c)(3).

Sites Identified in Multiple Planning Periods: Sites identified in prior planning periods shall not be deemed adequate to accommodate the housing needs for lower-income households unless a program, meeting statutory requirements, requires rezoning within one or three years, whichever is applicable. The element should clearly indicate any sites that were identified in the prior planning period that are being utilized for the lower-income RHNA, then add or modify programs, if necessary. The program should ensure

sites will meet density requirements and allow by-right approval for housing developments that include 20 percent or more of its units affordable to lower income households.

Electronic Sites Inventory: For your information, pursuant to Government Code section 65583.3, the County must submit an electronic sites inventory with its adopted housing element. The County must utilize standards, forms, and definitions adopted by HCD. Please see HCD's housing element webpage at <https://www.hcd.ca.gov/planning-and-community-development/housing-elements> for a copy of the form and instructions. The County can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance.

Accessory Dwelling Units (ADU): The element projects 355 ADUs over the planning period or approximately 44 ADUs per year over the eight-year planning period. These trends are inconsistent with HCD records and do not support an assumption of 44 ADUs per year. To support assumptions for ADUs in the planning period, the element should reduce the number of ADUs assumed per year and reconcile trends with HCD records, including additional information such as more recent permitted units and inquiries, resources and incentives, other relevant factors and modify policies and programs as appropriate. Further, programs should commit to additional incentives and strategies, frequent monitoring for production and affordability (every other year) and specific commitment to adopt alternative measures such as rezoning or amending the element within a specific time (e.g., 6 months) if needed. The element must also address affordability assumptions for ADU projections, by clarifying what ABAG assumptions are utilized.

Infrastructure: While the element states that there is sufficient water and sewer capacity to address the RHNA, it also states that there are limitations and constraints in certain areas of the unincorporated County. Given the lack of capacity, the element should include programs to address water and sewer infrastructure capacity such as pursuing funding and other opportunities to expand supply through conservation or employing strategies to secure additional water capacity.

For your information, water and sewer service providers must establish specific procedures to grant priority water and sewer service to developments with units affordable to lower-income households. (Gov. Code, § 65589.7.) Local governments are required to immediately deliver the housing element to water and sewer service providers. HCD recommends including a cover memo describing the County's housing element, including the County's housing needs and regional housing need. The element should demonstrate compliance with these requirements and add or modify programs, if necessary. For additional information and sample cover memo, see the Building Blocks at <https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/priority-water-and-sewer>.

Environmental Constraints: While the element generally describes a few environmental conditions, it must relate those conditions to identified sites and describe any other known environmental or other constraints (e.g., shape, conditions, easements,

contamination) that could impact housing development on identified sites in the planning period.

Zoning for a Variety of Housing Types:

- *Emergency Shelters*: The element should describe the development standards of the PC zone that allows emergency shelters by-right and should provide an analysis of proximity to transportation and services for these sites, hazardous conditions, and any conditions in appropriate for human habitability. In addition, the element should describe how emergency shelter parking requirements comply with AB139/Government Code section 65583, subdivision (a)(4)(A) or include a program to comply with this requirement. Lastly, Chapter 654, Statutes of 2022 (AB 2339), adds specificity on how cities and counties plan for emergency shelters and ensure sufficient and suitable capacity. Future submittals of the housing element may need to address these statutory requirements. For additional information and timing requirements, please see HCD's memo at <https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/ab2339-notice.pdf>.
- *By-Right Permanent Supportive Housing*: Supportive housing shall be a use by-right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses pursuant to Government Code section 65651. The element must demonstrate compliance with these requirements and include programs as appropriate.
- *Low Barrier Navigation Centers*: While the element includes a program to allow Low Barrier Navigation Centers, it is limited to emergency shelter zones. Low Barrier Navigation Centers shall be a use by-right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses pursuant to Government Code section 65660. The element must demonstrate compliance with this requirement and include programs as appropriate.
- *Single Room Occupancy (SRO) Units*: The element generally lists SROs as allowed uses with a conditional use permit (CUP) in some zones but should also discuss development standards and permit procedures that facilitate the uses and add or modify programs as appropriate to address any constraint.
- *Accessory Dwelling Unit (ADU)*: The element indicates the County modifies its zoning code to ease barriers to the development of ADU's. However, after a cursory review of the County's ordinance, HCD discovered several areas which are not consistent with State ADU Law. HCD will provide a complete listing of ADU noncompliance issues under a separate cover. As a result, the element should add a program to update the County's ADU ordinance to comply with state law. For more information, please consult HCD's ADU Guidebook, published in December 2020, which provides detailed information on new state requirements surrounding ADU development.

4. *An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of*

housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures... (Gov. Code, § 65583, subd. (a)(5).)

Land Use Controls: The element must identify and analyze all relevant land use controls impacts as potential constraints on a variety of housing types. The analysis should analyze land use controls independently and cumulatively with other land use controls. The analysis should specifically address requirements related to parking, heights, lot coverage and limits on allowable densities. The analysis should address any impacts on cost, supply, housing choice, affordability, timing, approval certainty and ability to achieve maximum densities and include programs to address identified constraints. Specifically, the element must describe and analyze all parking requirements including garage requirements and those identified as a constraint (p. G-15). In addition, the element should describe and analyze limits on new residential permits per year identified in the Local Coastal Plan and add a program to address the constraint. In Table B-1, the element only lists one allowed density, instead of a range of allowed densities for mixed-use zones. The element must analyze whether this is a constraint on development and add a program as appropriate. The element should also analyze maximum lot coverages (less than 50 percent for multifamily zones), height limits, setbacks, daylight plane requirements, minimum lot size, and open space requirements. Lastly, the element should list the typical densities allowed in each zone.

Fees and Exaction: The element must describe all required fees for single family and multifamily housing development, including impact fees, and analyze their impact as potential constraints on housing supply and affordability. For example, the analysis could identify the total amount of fees and their proportion to the development costs for both single family and multifamily housing. For additional information and a sample analysis and tables, see the Building Blocks at <https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/fees-and-exactions>.

Local Processing and Permit Procedures: While the element includes information about processing times, it should also describe the procedures for a typical single family and multifamily development. The analysis should address the approval body, the number of public hearing if any, approval findings and any other relevant information. The analysis should address impacts on housing cost, supply, timing and approval certainty. For example, the element should identify and analyze approval findings for impacts on approval certainty, the presence of processes or guidelines to promote certainty and add or modify programs as appropriate. In addition, the element states that multifamily development requires a CUP in commercial zones. The County is currently relying on commercial zones to meet lower income RHNA. The element should analyze the constraint and add a program as appropriate. In addition, the element must describe the variance process as it is described as needed for some developments under existing land use standards. The element should also analyze the length of time to process typical single family and multifamily developments. Lastly, the element should describe

the Planned Unit Development (PUD) process and whether it is required or optional and add programs as appropriate.

Design Review: The element must describe and analyze the design review guidelines and process, including approval procedures and decision-making criteria, for their impact as potential constraints on housing supply and affordability. For example, the analysis could describe required findings and discuss whether objective standards and guidelines improve development certainty and mitigate cost impacts. The element must demonstrate this process is not a constraint or include a program to address this permitting requirement, as appropriate.

Inclusionary Housing: While the element generally states the County has an inclusionary ordinance, it must also describe and analyze the City's inclusionary housing requirements, including its impacts as potential constraints on the development of housing for all income levels. The analysis must evaluate the inclusionary policy's implementation framework, including levels of mandated affordability and the types of options and incentives offered to encourage and facilitate compliance with the inclusionary requirements. The County could engage the development community to facilitate this analysis.

State Density Bonus Law: The County's current density bonus ordinance should be reviewed for compliance with current state density bonus law (Gov. Code, § 65915) and programs should be added as necessary.

Codes and Enforcement: The element must describe and analyze any local amendments to the building code and their degree and type of enforcement for impacts on housing supply and affordability.

Zoning Fees and Transparency: The element must clarify its compliance with new transparency requirements for posting all zoning and development standards, and inclusionary requirements for each parcel on the jurisdiction's website pursuant to Government Code section 65940.1(a)(1).

Constraints on Housing for Persons with Disabilities: The element must include an analysis of zoning, development standards, building codes, and process and permit procedures as potential constraints on housing for persons with disabilities. The element must describe and analyze any definitions of family used in zoning and land use for impacts on housing for persons with disabilities and add or modify programs as appropriate. In addition, group homes for seven or more persons appears to be excluded from several zones allowing residential uses and subject to a CUP. The element should evaluate these requirements as constraints and include specific commitment to amend zoning and permit procedures to allow these uses in all zones allowing residential with objectivity to facilitate approval certainty.

- 5. An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including... requests to develop housing at densities below those anticipated in the analysis required by subdivision (c) of Government Code section 65583.2, and the length of time between*

receiving approval for a housing development and submittal of an application for building permits for that housing development that hinder the construction of a locality's share of the regional housing need in accordance with Government Code section 65584... (Gov. Code, § 65583, subd. (a)(6).)

Approval Time and Requests Lesser Densities: The element must include analysis of requests to develop housing at densities below those identified in the sites inventory, and the length of time between receiving approval for a housing development and submittal of an application for building permits that potentially hinder the construction of a locality's share of the regional housing need and include programs as appropriate.

- 6. Analyze any special housing needs such as elderly; persons with disabilities, including a developmental disability; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. (Gov. Code, § 65583, subd. (a)(7).)*

Special Needs Populations: While the element quantifies the County's special needs populations, it must also analyze the special housing needs for persons with disabilities and female headed households. For a complete analysis, the element should discuss challenges faced by the population, the existing resources to meet those needs (availability senior housing units, number of large units, number of deed restricted units, etc.), an assessment of any gaps in resources, and proposed policies, programs, and funding to help address those gaps.

C. Housing Programs

- 1. Include a program which sets forth a schedule of actions during the planning period, each with a timeline for implementation, which may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the Housing Element... (Gov. Code, § 65583, subd. (c).)*

To address the program requirements of Gov. Code section 65583, subd. (c)(1-6), and to facilitate implementation, programs should include: (1) a description of the County's specific role in implementation; (2) definitive implementation timelines; (3) objectives, quantified where appropriate; and (4) identification of responsible agencies and officials. Programs to be revised include the following:

- Many programs state actions will be "considered" without specific commitment to outcomes. The programs should be revised to include specific commitments to implement the actions within a specific timeframe.
- Program 1.1: The program should be revised to include how often the County will apply for funding.
- Program 1.3: The program should be revised to include specific actions and proactive outreach.

- Program 1.4: The program should be revised to include incentives the County will provide as well as whether they are currently in place or timing to implement the identified incentives.
- Program 6.1: The program should be revised to include specific timing and proactive outreach.
- Program 6.2: The program should include specific timing of how often the County will apply for funding.
- Program 6.4: The program should include timing on how often the County will reach out to landlords.
- Program 6.5: The program should be revised to include timing on how often the housing authority will engage with stakeholders as well as include implementing actions resulting from coordination.
- Program 8.1: The program should include actions to implement the results from the study of displacement impacts.
- Programs 9.1 and 9.2: The programs should be revised to include timing on how often the County will apply for funding.
- Program 10.2: The program should be revised to include implementation actions after study is complete.
- Program 11.2: The program should be revised to include commitment to implement actions following the study.
- Program 14.1: The program should be revised to include specific timing to implement the identified actions.
- Program 14.2: The program should be revised to include timing of how often the County apply for funding.
- Program 15.1: The program should include proactive outreach and actions the County will take to encourage the development.
- Program 15.2: The program should be revised to describe the constraints that will be addressed and include specific timing for implementation.
- Program 18.1: The program should be revised to include implementation after the study, as well as how often the county will apply for funds.
- Program 19.1: The program should clarify whether there are any County owned sites listed in the inventory. If so, the program must commit to complying with Surplus Lands Act and include specific timing for RFPs and implementation.
- Program 22.1: The program should state how often the County will collaborate and what actions will result. In addition, Action D includes discretion and should clarify what determines whether exemptions are approved.
- Program 22.2: The program should include actions of how the County will encourage and incentivize large units as well as include specific implementation timing.
- Program 22.4: The program should be revised to include specific timing to implement actions to assist farmworker housing.
- Program 23.2: The program should be revised to include implementing actions and specific timing.
- Program 23.6: The program should clarify whether the incentives are in place and list potential incentives. If they are not currently in place, the program should

include specific actions to implement identified incentives as well as include proactive outreach.

- Program 25.1: The program should include commitment to implement the actions resulting from the study.
- Program 30.1: The program should be revised to include proactive outreach to developers on what incentives are provided. It should also include commitment to implement suggested revisions.
- Program 31.1: The program should specify what potential parking revisions will be, and include specific timing for implementation.
- Program 36.1: The program should include timing on how often education and outreach will occur.

2. *Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. (Gov. Code, § 65583, subd. (c)(1).)*

As noted in Finding B3, the element does not include a complete site analysis, therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the County may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types.

In addition, the element describes a shortfall of sites and indicates rezoning will occur to accommodate the RHNA. While the element includes Programs 2.1, 11.1, and 11.3, it must specifically commit to acreage, allowable densities and anticipated units. In addition, if necessary, to accommodate the housing needs of lower-income households, the program should specifically commit to rezoning pursuant to Government Code section 65583.2, subdivisions (h) and (i).

3. *Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)*

As noted in Findings B4 and B5, the element requires a complete analysis of potential governmental and nongovernmental constraints. Depending upon the results of that

analysis, the County may need to revise or add programs and address and remove or mitigate any identified constraints.

4. *Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics... (Gov. Code, § 65583, subd. (c)(5).)*

As noted in Finding B1, the element must be revised to add or modify goals and actions based on the outcomes of a complete analysis. Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have specific commitment, milestones, geographic targeting and metrics or numerical targets and, as appropriate, address housing mobility enhancement, new housing choices and affordability in high opportunity areas, place-based strategies for community preservation and revitalization and displacement protection. In addition, the element should describe how the fair housing action plan is tied to the housing element programs and include implementation.

D. Quantified Objectives

Establish the number of housing units, by income level, that can be constructed, rehabilitated, and conserved over a five-year time frame. (Gov. Code, § 65583, subd. (b)(1 & 2).)

The element must include quantified objectives to establish an estimate of housing units by income category that can be constructed, rehabilitated, and conserved over the planning period. While the element includes these objectives for construction, it must also include estimates for rehabilitation and not limit conserved units to at-risk properties. In addition, the element must also include objectives for extremely low-income households.

E. Public Participation

Local governments shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the Housing Element, and the element shall describe this effort. (Gov. Code, § 65583, subd.(c)(9).)

While the element includes a general summary of the public participation process, it must also demonstrate diligent efforts were made to involve all economic segments of the community in the development of the housing element. The element should be revised to discuss outreach to lower-income and special needs groups during the public participation efforts, solicitation efforts for survey responses, and participation in community workshops, and if translation services were provided.

F. Coastal Zone and Replacement Requirements

Coastal localities shall document the number of low- and moderate-income units converted or demolished, and the number of replacement units provided. (Gov. Code, § 65588, subd. (d).)

The element does not meet the statutory requirements. To determine whether the County's affordable housing stock in the coastal zone is being protected and provided as required by Government Code section 65588, the element must be revised to include the following:

1. The number of new housing units approved for construction within the coastal zone since January 1982.
2. The number of housing units for persons and families of low- and moderate-income required to be provided in new housing developments either within the coastal zone or within three miles.
3. The number of existing residential dwelling units occupied by low- and moderate-income households either within the coastal zone or three miles of the coastal zone that have been authorized to be demolished or converted since January 1982.
4. The number of residential dwelling units for low- and moderate-income households that have been required for replacement.



County of San Mateo - Planning and Building Department

ATTACHMENT C

San Mateo County 2022-2031 Housing Element Update – March 2024 Draft Inventory of Housing Element Changes in Response to HCD Comment

The inventory below presents the locations of amendments and clarifications in San Mateo County's draft updated Housing Element, in response to comments received from the California Department of Housing and Community Development on April 20, 2023, as well as a list of other substantive changes made since the prior Housing Element Draft (January 20, 2023). HCD's full comment letter is [here](#). The updated San Mateo County Housing Element is [here](#). Changes are shown in the draft Housing Element in **red text**.

A. Review and Revision

Review the previous element to evaluate the appropriateness, effectiveness, and progress in implementation, and reflect the results of this review in the revised element. (Gov. Code, § 65588 (a) and (b).)

While the element describes results of the prior element's programs, it must also evaluate the effectiveness of prior programs and then add or modify current programs as appropriate based on the evaluation.

- Each program and policy reviewed in Appendix D of the Housing Element, beginning with on page D-1, now includes a review of effectiveness, and description of the status of the program. Various programs in the updated Housing Element, included in the Housing Plan, have been modified based on this evaluation.

In addition, the element must provide an evaluation of the cumulative effectiveness of past goals, policies, and related actions in meeting the housing needs of special needs populations (e.g., elderly, persons with disabilities, large households, female-headed households, farmworkers, and persons experiencing homelessness) and revise programs as appropriate.

- An evaluation of the cumulative effectiveness of past goals, policies and related actions in meeting the housing needs of special needs populations is included at the end of Appendix D, on pages D-64 through D-66.

B. Housing Needs, Resources, and Constraints

1. *Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2...shall include an assessment of fair housing in the jurisdiction. (Gov. Code, § 65583, subd. (c)(10)(A).)*

Enforcement and Outreach: The element provides a discussion on community outreach conducted, but it must also describe the process to refer fair housing complaints and how the County complies with federal and state fair housing laws.

- This description has been added to the Housing Element in Appendix G, Section I, pages G-13 through G-15.

Integration and Segregation: While the element discusses some patterns and trends within the County related to persons with disabilities and household incomes, it should also compare the County to the broader region for these factors. In addition, the element should describe patterns and trends for familial status within the County

(comparing different areas of the County) and at a regional level (comparing the County to the broader region). Lastly, the element should analyze what contributes to the identified segregation of race within the County to better formulate appropriate policies and programs. For example, the analysis of patterns and trends should incorporate local data and knowledge and other relevant factors (See below) to refine the fair housing issues and formulate an appropriate and impactful policy and program.

- Expanded assessment of integration and segregation has been incorporated in the Housing Element in Appendix G, Section II, pages G-16 through G-29.

Racial/Ethnic Areas of Concentration of Poverty (R/ECAP) and Racially Concentrated Area of Affluence (RCAA): While the element states where R/ECAPs are located within the County, it must provide specific analysis of conditions and circumstances. The analysis should address trends, coincidence with other fair housing issues (segregation and integration, access to opportunities, disproportionate impacts), neighborhood conditions (e.g., housing, infrastructure, circulation, parks, community facilities and amenities) and compare overall quality of life to other areas of the County. Then, the element should formulate significant and meaningful policies and programs, including but not limited to place-based strategies toward community revitalization and mitigation of displacement risk. Similarly, the element must analyze the RCAAs. The analysis should consider coincidence with other fair housing issues, discuss the presence of RCAAs relative to the broader region and incorporate local data and knowledge and other relevant factors such as zoning and land use practices or lack of investment or other policies to promote affordable housing. Then, the element should include significant and meaningful actions to promote housing mobility and new housing opportunities in higher opportunity, higher income and concentrated areas of affluence to facilitate more inclusive neighborhoods.

- While San Mateo County has no formal R/ECAPs as identified by State and Federal mapping, the Housing Element does discuss the two edge R/ECAP census tracts located within the County, and the R/ECAP formerly identified in the 2010 Census data, in Appendix G on pages G-30 and G-31. Additional discussion of R/ECAPs and RCAAs has been added to Appendix G on pages G-31 through G-34.

Disparities in Access to Opportunity: While the element provides an analysis of patterns and trends within the County (local analysis), it must be revised to include a regional analysis (comparing the County to the broader region) for education, economy, and environment. In addition, the element should describe whether there is equal access to transit throughout the County, including unincorporated areas and provide a regional analysis. The element should also describe what factors contribute to low education

scores and job access within unincorporated areas.

- An expanded assessment of disparities has been added to Appendix G, Section III, on pages G-35 through G-44.

Disproportionate Housing Needs Including Displacement: The element should provide a regional analysis for cost burden and overcrowding. In addition, the element must describe any concentration of substandard housing both locally and regionally. The element should also clarify whether the most recent Point in Time (PIT) count for persons experiencing homelessness is representative of the County. The element must also describe and analyze areas sensitive to displacement, including displacement risk due to disaster (e.g., earthquake, fire, and flood).

- This assessment has been added to Housing Element in Appendix G, on pages G-46 through G-62.

Identified Sites and Affirmatively Furthering Fair Housing (AFFH): The element must include a locational analysis (neighborhood by neighborhood) of the regional housing needs allocation (RHNA) by income group and evaluate the impact of identified sites in each area. While the element analyzed identified sites against some fair housing factors, the element must identify whether sites improve or exacerbate fair housing issues in the County. A full analysis should address the income categories of identified sites with respect to location, the number of sites and units by all income groups, and how that affects the existing patterns for all components of the assessment of fair housing (e.g., segregation and integration, access to opportunity). If sites exacerbate conditions, the element should identify further program actions that will be taken to promote equitable quality of life throughout the community (e.g., anti-displacement and place-based community revitalization strategies).

- This assessment is included in the updated Housing Element in Appendix G, beginning on page G-63.

Other Relevant Factors: To complete an analysis, the element must complement state and federal data and mapping with other relevant factors that contribute to fair housing issues in the jurisdiction. Other relevant factors should be incorporated into the discussion of socio-economic patterns. For instance, the element can analyze historical land use and investment practices and how that influenced fair housing issues. For more information, please see HCD's AFFH Guidance Memo at <https://www.hcd.ca.gov/planning-and-community-development/affirmatively-furthering-fair-housing>.

- Historical land use patterns and investment practices are discussed in Appendix G, pages G-1 through G-5, and augmented information has been incorporated throughout Appendix G.

Contributing Factors: The element identifies many contributing factors to fair housing issues. Based on a complete analysis, the element must re-assess and particularly prioritize these factors to better formulate policies and programs and carry out significant and meaningful actions.

- The fair housing programs included in the Housing Plan, and those aggregated in the Fair Housing Action Plan in Appendix G-5, have been expanded to prioritize and target these factors. New and modified programs are indicated in redline, and fair housing programs are specifically identified in the Housing Plan, as well as included in the Fair Housing Plan.

2. *Include an analysis and documentation of household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding, and housing stock condition. (Gov. Code, § 65583, subd. (a)(2).)*

Housing Stock Condition: While the element states that the need for housing rehabilitation and replacement has increased since the last housing element, it must include an estimate of the number of units in need of rehabilitation and replacement. For example, the analysis could include estimates from a recent windshield survey or sampling, estimates from the code enforcement agency, or information from knowledgeable builders/developers, including nonprofit housing developers or organizations.

- Additional information on housing stock conditions has been added to Appendix A, on pages A-39 through A-42.

Housing Costs: While the element includes estimated rents for residents, it utilizes American Community Survey (ACS) data. The element should supplement census data with other sources (e.g., Zillow, apartments.com).

- Additional information on rental costs from local listings has been added to Appendix A, Table A-49b, page A-29.

3. *An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)*

Progress in Meeting the RHNA: The County's RHNA may be reduced by the number of new units built since June 30, 2022; however, the element must demonstrate their affordability based on actual sales price, rent level, or other mechanisms ensuring affordability (e.g., deed restrictions). The element should also discuss the status, any barriers to development and other relevant factors to demonstrate their availability in the planning period.

- The Housing Element does not count any units built since June 30, 2022 against the County's RHNA.

Realistic Capacity: While the element states that realistic capacity is based on recent trends, it must state what the actual assumptions are in each zone. The element should demonstrate what specific trends, factors, and other evidence led to the assumptions. The estimate of the number of units for each site must be adjusted as necessary, based on the land use controls and site improvements, typical densities of existing or approved

residential developments at a similar affordability level in that jurisdiction, and on the current or planned availability and accessibility of sufficient water, sewer, and dry utilities. The element also needs to analyze the likelihood that the identified units will be developed as noted in the inventory in zones that allow 100 percent nonresidential uses (e.g., mixed-use). This analysis should consider the likelihood of nonresidential development, performance standards, and development trends supporting residential development.

- An expanded assessment of recent development trends and types and an expanded assessment of development and redevelopment feasibility justifying the projections incorporated in the Housing Element are included in Appendix E, pages E-2 through E-12, as well as a comprehensively updated Sites Inventory and Rezoning Program.

In addition, the element appears to assume residential development on sites with zoning that allows 100 percent nonresidential uses, but to support this assumption, the element must analyze the likelihood of residential development in zoning where 100 percent nonresidential uses are allowed. The analysis should be based on factors such as development trends including nonresidential, performance standards requiring residential uses or other relevant factors such as enhanced policies and programs.

- It is important to note that none of the commercial mixed-use zones included in the Housing Element allow 100 percent non-residential development. All of the zones included in the Housing Element (CMU commercial mixed use zones, NMU neighborhood mixed-use zones, and PC/Planned Colma zone) allow only either 100% multifamily development, or primarily residential development with a limited portion of non-residential development on the ground floor only. This has been clarified in the Housing Element in Appendix B on pages B-6, B-7, B-9, B-11, and B-12, and in Appendix E on page E-6.

The Housing Element does include some areas currently zoned to allow entirely non-residential development in the Rezoning Program, but these are proposed for rezoning to allow only 100% multifamily development, or multifamily residential development with a limited amount of ground-floor non-residential uses only.

Suitability of Nonvacant Sites: The element must include an analysis demonstrating the potential for redevelopment of nonvacant sites. The description of existing uses should be sufficiently detailed to facilitate an analysis demonstrating the potential for additional development in the planning period. In addition, the element must analyze the extent that existing uses may impede additional residential development. For example, the element includes sites identified as commercial, parking, and residential; but must also demonstrate whether these existing uses would impede development of these sites within the planning period. The element can summarize past experiences converting existing uses to higher density residential development, include current market demand for the existing use, provide analysis of existing leases or contracts that would perpetuate the existing use or prevent additional residential development and include current information on development trends and market conditions in the County and relate those trends to the sites identified. The element could also support, based on recent development trends, indicators such as age and condition of the existing structure, expressed developer interest, existing versus allowable floor area, low improvement to land value ratio, and

other factors.

In addition, as noted in the housing element, the housing element relies upon nonvacant sites to accommodate more than 50 percent of the RHNA for lower income households. For your information, the housing element must demonstrate existing uses are not an impediment to additional residential development and will likely discontinue in the planning period (Gov. Code, § 65583.2, subd. (g)(2).). Absent findings (e.g., adoption resolution) based on substantial evidence, the existing uses will be presumed to impede additional residential development and will not be utilized toward demonstrating adequate sites to accommodate the RHNA.

- The Housing Element includes significantly expanded discussion of these factors, as well as a comprehensively revised Sites Inventory and Rezoning Program, throughout Appendix E.

Small Sites: Sites smaller than a half-acre in size are deemed inadequate to accommodate housing for lower-income housing unless it is demonstrated that sites of equivalent size and affordability were successfully developed during the prior planning period or unless the housing element describes other evidence to HCD that the site is adequate to accommodate lower-income housing (Gov. Code, § 65583.2, subd. (c)(2)(A).). The element lists small sites and states the sites are suitable but must also evaluate whether those sites are suitable to accommodate housing for lower income households and add or modify programs as appropriate. For example, the element could list past consolidations by the number of parcels, number of owners, zone, number of units, affordability and circumstances leading to consolidation and then relate those trends to the identified sites or could explain the potential for consolidation on a site-by-site basis.

- The Housing Element now includes significantly expanded analysis of the developability of small sites, based on recent trends in the unincorporated County and countywide, demonstrating the feasibility and likelihood of these sites, included in Appendix E.

SB 9 Sites: The element identifies SB 9 as a strategy to accommodate the part of the County's need of moderate and above-moderate RHNA. To support these assumptions, the analysis must include experience, trends and market conditions that allow lot splits and missing middle uses. The analysis must list the potential SB 9 sites and demonstrate the likelihood of redevelopment, including whether existing uses constitute as an impediment for additional residential use. The analysis should describe how the County determined eligible properties, whether the assumed lots will have turnover, if the properties are easy to subdivide, and the condition of the existing structures. The analysis should also describe interest from property owners as well as experience. The analysis should provide support for the units assumed to be developed within the planning period. Based on the outcomes of this analysis, the element should add or modify to establish zoning and development standards early in the planning period and implement incentives to encourage and facilitate development as well as monitor development every two years with and identify additional sites within six months if assumptions are not being met. The element should support this analysis with local information such as local developer or owner interest to utilize zoning and incentives established through SB 9.

- While the County continues to receive application for and continues to approve SB 9 sites in growing numbers, consistent with the State's intent to incentivize this type of development, the updated Housing Element does not include any projections of SB 9 sites.

Replacement Housing Requirements: Generally, if the sites inventory identifies sites with existing residential uses that meet specific conditions, the element should include a program for replacement housing. Absent a replacement housing program, these sites are not adequate sites to accommodate lower-income households. The replacement housing program has the same requirements as set forth in Government Code section 65915, subdivision (c)(3).

- The Sites Inventory does not include any sites subject to the requirements of Government Code section 65915, subdivision (c)(3).

Sites Identified in Multiple Planning Periods: Sites identified in prior planning periods shall not be deemed adequate to accommodate the housing needs for lower-income households unless a program, meeting statutory requirements, requires rezoning within one or three years, whichever is applicable. The element should clearly indicate any sites that were identified in the prior planning period that are being utilized for the lower-income RHNA, then add or modify programs, if necessary. The program should ensure sites will meet density requirements and allow by-right approval for housing developments that include 20 percent or more of its units affordable to lower income households.

- The Housing Element Sites Inventory does not include any sites identified in prior planning periods, with the exception of sites that have been rezoned for significantly different uses and densities since adoption of the prior Housing Element, and/or sites that are proposed to be rezoned for significantly different uses and densities as part of the Housing Element's Rezoning Program.

Electronic Sites Inventory: For your information, pursuant to Government Code section 65583.3, the County must submit an electronic sites inventory with its adopted housing element. The County must utilize standards, forms, and definitions adopted by HCD. Please see HCD's housing element webpage at <https://www.hcd.ca.gov/planning-and-community-development/housing-elements> for a copy of the form and instructions. The County can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance.

- An electronic sites inventory was submitted with the County's initial submittal of the updated Housing Element to HCD, and a comprehensively revised electronic sites inventory will be submitted with resubmittal of the amended Housing Element.

Accessory Dwelling Units (ADU): The element projects 355 ADUs over the planning period or approximately 44 ADUs per year over the eight-year planning period. These trends are inconsistent with HCD records and do not support an assumption of 44 ADUs per year. To support assumptions for ADUs in the planning period, the element should reduce the number of ADUs assumed per year and reconcile trends with HCD records, including additional information such as more recent permitted units and inquiries,

resources and incentives, other relevant factors and modify policies and programs as appropriate. Further, programs should commit to additional incentives and strategies, frequent monitoring for production and affordability (every other year) and specific commitment to adopt alternative measures such as rezoning or amending the element within a specific time (e.g., 6 months) if needed. The element must also address affordability assumptions for ADU projections, by clarifying what ABAG assumptions are utilized.

- The ADU projections in the Housing Element have been amended to project 240 units over the next 8 years, consistent with ADU development over the past 4 years, with no additional projected growth, as shown in Appendix E, pages E-32 and E-33. The Housing Plan also includes a number of programs intended to incentivize and facilitate ADU production.

Infrastructure: While the element states that there is sufficient water and sewer capacity to address the RHNA, it also states that there are limitations and constraints in certain areas of the unincorporated County. Given the lack of capacity, the element should include programs to address water and sewer infrastructure capacity such as pursuing funding and other opportunities to expand supply through conservation or employing strategies to secure additional water capacity.

- The discussion of infrastructure constraints in the Housing Element is unrelated to the areas and sites identified in the Sites Inventory and Rezoning Program, and those sites are not impacted by such constraints. However, the Housing Plan identifies several programs intended to assess and address infrastructure constraints, including HE 7.5, HE 15.1, HE 18.1, He 22.5 and HE 22.7.

For your information, water and sewer service providers must establish specific procedures to grant priority water and sewer service to developments with units affordable to lower-income households. (Gov. Code, § 65589.7.) Local governments are required to immediately deliver the housing element to water and sewer service providers. HCD recommends including a cover memo describing the County's housing element, including the County's housing needs and regional housing need. The element should demonstrate compliance with these requirements and add or modify programs, if necessary. For additional information and sample cover memo, see the Building Blocks at <https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/priority-water-and-sewer>.

Environmental Constraints: While the element generally describes a few environmental conditions, it must relate those conditions to identified sites and describe any other known environmental or other constraints (e.g., shape, conditions, easements, contamination) that could impact housing development on identified sites in the planning period.

- The Sites Inventory and Rezoning Program and the developability and redevelopability of sites included in Appendix E and in the electronic submission of this data includes all known environmental constraints.

Zoning for a Variety of Housing Types:

- **Emergency Shelters:** The element should describe the development standards of the PC zone that allows emergency shelters by-right and should provide an analysis of proximity to transportation and services for these sites, hazardous conditions, and any conditions in appropriate for human habitability. In addition, the element should describe how emergency shelter parking requirements comply with AB139/Government Code section 65583, subdivision (a)(4)(A) or include a program to comply with this requirement. Lastly, Chapter 654, Statutes of 2022 (AB 2339), adds specificity on how cities and counties plan for emergency shelters and ensure sufficient and suitable capacity. Future submittals of the housing element may need to address these statutory requirements. For additional information and timing requirements, please see HCD's memo at <https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/ab2339-notice.pdf>.

- This information is included in Appendix B, page B-2.

- **By-Right Permanent Supportive Housing:** Supportive housing shall be a use by-right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses pursuant to Government Code section 65651. The element must demonstrate compliance with these requirements and include programs as appropriate.

- As noted in Appendix B, pages B-22 through B-25, while the County follows the provisions of Government Code section 65651, the County's regulations do not directly address the permitting of permanent supportive housing. Program HE 22.12 commits the County to appropriately updating its zoning regulations.

- **Low Barrier Navigation Centers:** While the element includes a program to allow Low Barrier Navigation Centers, it is limited to emergency shelter zones. Low Barrier Navigation Centers shall be a use by-right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses pursuant to Government Code section 65660. The element must demonstrate compliance with this requirement and include programs as appropriate.

- As noted in Appendix B, pages B-22 through B-25, while the County follows the provisions of Government Code section 65651, the County's regulations do not directly address the permitting of navigation centers, which were not a known development type when the majority of the County's zoning regulations were drafted. Program HE 22.12 commits the County to appropriately updating its zoning regulations.

- **Single Room Occupancy (SRO) Units:** The element generally lists SROs as allowed uses with a conditional use permit (CUP) in some zones but should also discuss development standards and permit procedures that facilitate the uses and add or modify programs as appropriate to address any constraint.

- As noted in Appendix B, pages B-22 through B-25, the County allows SROs in all multifamily zones, but in most cases the County's regulations do not mention SROs as a permitted or prohibited use. Program HE 22.12 commits the County to

appropriately updating its zoning regulations.

- *Accessory Dwelling Unit (ADU)*: The element indicates the County modifies its zoning code to ease barriers to the development of ADU's. However, after a cursory review of the County's ordinance, HCD discovered several areas which are not consistent with State ADU Law. HCD will provide a complete listing of ADU noncompliance issues under a separate cover. As a result, the element should add a program to update the County's ADU ordinance to comply with state law. For more information, please consult HCD's ADU Guidebook, published in December 2020, which provides detailed information on new state requirements surrounding ADU development.
- The County has been in communication with HCD but has yet to receive the listing discussed above. However, the County has amended its zoning regulations regarding ADUs several times since 2018 to comply with changes to State law, and is currently in the process of updating its regulations to conform to subsequent changes to State law, as noted in HE 26.7 in the Housing Plan.

4. *An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures... (Gov. Code, § 65583, subd. (a)(5).)*

Land Use Controls: The element must identify and analyze all relevant land use controls impacts as potential constraints on a variety of housing types. The analysis should analyze land use controls independently and cumulatively with other land use controls. The analysis should specifically address requirements related to parking, heights, lot coverage and limits on allowable densities. The analysis should address any impacts on cost, supply, housing choice, affordability, timing, approval certainty and ability to achieve maximum densities and include programs to address identified constraints.

Specifically, the element must describe and analyze all parking requirements including garage requirements and those identified as a constraint (p. G-15). In addition, the element should describe and analyze limits on new residential permits per year identified in the Local Coastal Plan and add a program to address the constraint. In Table B-1, the element only lists one allowed density, instead of a range of allowed densities for mixed-use zones. The element must analyze whether this is a constraint on development and add a program as appropriate. The element should also analyze maximum lot coverages (less than 50 percent for multifamily zones), height limits, setbacks, daylight plane requirements, minimum lot size, and open space requirements. Lastly, the element should list the typical densities allowed in each zone.

- This information is included in Appendix B, beginning on page B-6.

Fees and Exaction: The element must describe all required fees for single family and multifamily housing development, including impact fees, and analyze their impact as potential constraints on housing supply and affordability. For example, the analysis could

identify the total amount of fees and their proportion to the development costs for both single family and multifamily housing. For additional information and a sample analysis and tables, see the Building Blocks at <https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/fees-and-exactions>.

- This information is included in Appendix B, pages B-26 through B-44.

Local Processing and Permit Procedures: While the element includes information about processing times, it should also describe the procedures for a typical single family and multifamily development. The analysis should address the approval body, the number of public hearing if any, approval findings and any other relevant information. The analysis should address impacts on housing cost, supply, timing and approval certainty. For example, the element should identify and analyze approval findings for impacts on approval certainty, the presence of processes or guidelines to promote certainty and add or modify programs as appropriate. In addition, the element states that multifamily development requires a CUP in commercial zones. The County is currently relying on commercial zones to meet lower income RHNA. The element should analyze the constraint and add a program as appropriate. In addition, the element must describe the variance process as it is described as needed for some developments under existing land use standards. The element should also analyze the length of time to process typical single family and multifamily developments. Lastly, the element should describe the Planned Unit Development (PUD) process and whether it is required or optional and add programs as appropriate.

- Information on processes and approval bodies is provided in Appendix B, pages B-22 through B-33.

As noted above, the Housing Element Sites Inventory does not rely on residential development or redevelopment in any commercial zoning districts. The County's mixed-use districts incorporated in the Sites Inventory allow 100% multifamily residential or multifamily residential with at most one ground-floor story of non-residential uses. The Rezoning Program does propose rezoning of some sites on which only non-residential development is currently allowed, but these are proposed to be rezoned to allow multifamily residential uses by right.

The PUD process is described in Appendix B, on page B-13.

Design Review: The element must describe and analyze the design review guidelines and process, including approval procedures and decision-making criteria, for their impact as potential constraints on housing supply and affordability. For example, the analysis could describe required findings and discuss whether objective standards and guidelines improve development certainty and mitigate cost impacts. The element must demonstrate this process is not a constraint or include a program to address this permitting requirement, as appropriate.

- The design review process is described in Appendix B on pages B-22, and B-25 through B-31.

Inclusionary Housing: While the element generally states the County has an inclusionary ordinance, it must also describe and analyze the City's inclusionary housing requirements, including its impacts as potential constraints on the development of housing for all income levels. The analysis must evaluate the inclusionary policy's implementation framework, including levels of mandated affordability and the types of options and incentives offered to encourage and facilitate compliance with the inclusionary requirements. The County could engage the development community to facilitate this analysis.

- The elements of the County's Inclusionary Housing Program and their potential constraints on development are included on in Appendix B, on pages B-17 through B-20.

State Density Bonus Law: The County's current density bonus ordinance should be reviewed for compliance with current state density bonus law (Gov. Code, § 65915) and programs should be added as necessary.

- The County's Density Bonus Ordinance has been updated multiple times in recent years to comply with changes to State law, and incorporates an overriding provision affirming that in cases of conflict with State law, the County will implement State provisions, updates to the Density Bonus Ordinance are included as Program HE 20.2.

Codes and Enforcement: The element must describe and analyze any local amendments to the building code and their degree and type of enforcement for impacts on housing supply and affordability.

- The County has adopted the latest State Building Code with no substantive modifications, as discussed in Appendix B, page B-17.

Zoning Fees and Transparency: The element must clarify its compliance with new transparency requirements for posting all zoning and development standards, and inclusionary requirements for each parcel on the jurisdiction's website pursuant to Government Code section 65940.1(a)(1).

- The County's compliance with Government Code section 65940.1(a)(1) is discussed on pages B-34 and B-35.

Constraints on Housing for Persons with Disabilities: The element must include an analysis of zoning, development standards, building codes, and process and permit procedures as potential constraints on housing for persons with disabilities. The element must describe and analyze any definitions of family used in zoning and land use for impacts on housing for persons with disabilities and add or modify programs as appropriate. In addition, group homes for seven or more persons appears to be excluded from several zones allowing residential uses and subject to a CUP. The element should evaluate these requirements as constraints and include specific commitment to amend zoning and permit procedures to allow these uses in all zones allowing residential with

objectivity to facilitate approval certainty.

- The Housing Element assesses constraints on housing for persons with disabilities in Appendix B, beginning on page B-46, and commits to updating zoning regulations and procedures in Program HE 22.12.

5. *An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including... requests to develop housing at densities below those anticipated in the analysis required by subdivision (c) of Government Code section 65583.2, and the length of time between receiving approval for a housing development and submittal of an application for building permits for that housing development that hinder the construction of a locality's share of the regional housing need in accordance with Government Code section 65584... (Gov. Code, § 65583, subd. (a)(6).)*

Approval Time and Requests Lesser Densities: The element must include analysis of requests to develop housing at densities below those identified in the sites inventory, and the length of time between receiving approval for a housing development and submittal of an application for building permits that potentially hinder the construction of a locality's share of the regional housing need and include programs as appropriate.

- Approval times are discussed in Appendix B, page B-33 and B-34. Requests for lesser densities are discussed on page B-34.

6. *Analyze any special housing needs such as elderly; persons with disabilities, including a developmental disability; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. (Gov. Code, § 65583, subd. (a)(7).)*

Special Needs Populations: While the element quantifies the County's special needs populations, it must also analyze the special housing needs for persons with disabilities and female headed households. For a complete analysis, the element should discuss challenges faced by the population, the existing resources to meet those needs (availability senior housing units, number of large units, number of deed restricted units, etc.), an assessment of any gaps in resources, and proposed policies, programs, and funding to help address those gaps.

- The needs of special needs populations are addressed in Appendix A, beginning with page A-42. Resources for special needs populations are addressed in Appendix C on page C-2 through C-14. Programs addressing special needs are included as HE 17.1, HE 22.1, HE 22.9, HE 22.12, and HE 31.1.

C. Housing Programs

1. *Include a program which sets forth a schedule of actions during the planning period, each with a timeline for implementation, which may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to*

implement the policies and achieve the goals and objectives of the Housing Element...
(Gov. Code,
§ 65583, subd. (c).)

To address the program requirements of Gov. Code section 65583, subd. (c)(1-6), and to facilitate implementation, programs should include: (1) a description of the County's specific role in implementation; (2) definitive implementation timelines; (3) objectives, quantified where appropriate; and (4) identification of responsible agencies and officials. Programs to be revised include the following:

- Many programs state actions will be "considered" without specific commitment to outcomes. The programs should be revised to include specific commitments to implement the actions within a specific timeframe.
- Program 1.1: The program should be revised to include how often the County will apply for funding.
- Program 1.3: The program should be revised to include specific actions and proactive outreach.
- Program 1.4: The program should be revised to include incentives the County will provide as well as whether they are currently in place or timing to implement the identified incentives.
- Program 6.1: The program should be revised to include specific timing and proactive outreach.
- Program 6.2: The program should include specific timing of how often the County will apply for funding.
- Program 6.4: The program should include timing on how often the County will reach out to landlords.
- Program 6.5: The program should be revised to include timing on how often the housing authority will engage with stakeholders as well as include implementing actions resulting from coordination.
- Program 8.1: The program should include actions to implement the results from the study of displacement impacts.
- Programs 9.1 and 9.2: The programs should be revised to include timing on how often the County will apply for funding.
- Program 10.2: The program should be revised to include implementation actions after study is complete.
- Program 11.2: The program should be revised to include commitment to implement actions following the study.
- Program 14.1: The program should be revised to include specific timing to implement the identified actions.
- Program 14.2: The program should be revised to include timing of how often the County apply for funding.
- Program 15.1: The program should include proactive outreach and actions the County will take to encourage the development.
- Program 15.2: The program should be revised to describe the constraints that will be addressed and include specific timing for implementation.
- Program 18.1: The program should be revised to include implementation after the study, as well as how often the county will apply for funds.

- Program 19.1: The program should clarify whether there are any County owned sites listed in the inventory. If so, the program must commit to complying with Surplus Lands Act and include specific timing for RFPs and implementation.
- Program 22.1: The program should state how often the County will collaborate and what actions will result. In addition, Action D includes discretion and should clarify what determines whether exemptions are approved.
- Program 22.2: The program should include actions of how the County will encourage and incentivize large units as well as include specific implementation timing.
- Program 22.4: The program should be revised to include specific timing to implement actions to assist farmworker housing.
- Program 23.2: The program should be revised to include implementing actions and specific timing.
- Program 23.6: The program should clarify whether the incentives are in place and list potential incentives. If they are not currently in place, the program should include specific actions to implement identified incentives as well as include proactive outreach.
- Program 25.1: The program should include commitment to implement the actions resulting from the study.
- Program 30.1: The program should be revised to include proactive outreach to developers on what incentives are provided. It should also include commitment to implement suggested revisions.
- Program 31.1: The program should specify what potential parking revisions will be, and include specific timing for implementation.
- Program 36.1: The program should include timing on how often education and outreach will occur.

- Amendments in response to the comments above have been made throughout the Housing Plan, beginning on page 26 of the Housing Element, including greater specificity, firmer commitments to implementation, more detailed timelines, firmer and more quantifiable goals and milestones, clearer descriptions of implementation responsibility, and more robust programmatic actions, indicated in redlines throughout.

2. *Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. (Gov. Code, § 65583, subd. (c)(1).)*

As noted in Finding B3, the element does not include a complete site analysis, therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the County may need to add or revise programs to address

a shortfall of sites or zoning available to encourage a variety of housing types.

In addition, the element describes a shortfall of sites and indicates rezoning will occur to accommodate the RHNA. While the element includes Programs 2.1, 11.1, and 11.3, it must specifically commit to acreage, allowable densities and anticipated units. In addition, if necessary, to accommodate the housing needs of lower-income households, the program should specifically commit to rezoning pursuant to Government Code section 65583.2, subdivisions (h) and (i).

- The updated Housing Element includes a comprehensively revised Sites Inventory and Rezoning Program, presented in Appendix E, to address the County's RHNA. The Rezoning Program describes specific acreage, proposed densities, and anticipated units on a site-by-site basis and in aggregate. All areas proposed for rezoning will allow multifamily housing by right at densities of at least 60 units/acre.

In addition, the Housing Plan, beginning with page 26, incorporates multiple programs to facilitate production of housing for farm laborers, mobile home housing, senior housing, supportive housing, housing for persons with disabilities, extremely low-income housing, emergency shelters, and other housing of diverse types serving various populations.

3. *Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)*

As noted in Findings B4 and B5, the element requires a complete analysis of potential governmental and nongovernmental constraints. Depending upon the results of that analysis, the County may need to revise or add programs and address and remove or mitigate any identified constraints.

- The analysis of constraints is contained in Appendix B, and expanded programs to address constraints are included in the Housing Plan, beginning on page 26.

4. *Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics... (Gov. Code, § 65583, subd. (c)(5).)*

As noted in Finding B1, the element must be revised to add or modify goals and actions based on the outcomes of a complete analysis. Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have specific commitment, milestones, geographic targeting and metrics or numerical targets and, as appropriate, address housing mobility

enhancement, new housing choices and affordability in high opportunity areas, place-based strategies for community preservation and revitalization and displacement protection. In addition, the element should describe how the fair housing action plan is tied to the housing element programs and include implementation.

- As noted under B1 above, the expanded fair housing analysis is included in Appendix G, and new and expanded fair housing programs responsive to the analysis are included in the Fair Housing Plan, Appendix G-5, as well as in the Housing Plan.

D. Quantified Objectives

Establish the number of housing units, by income level, that can be constructed, rehabilitated, and conserved over a five-year time frame. (Gov. Code, § 65583, subd. (b)(1 & 2).)

The element must include quantified objectives to establish an estimate of housing units by income category that can be constructed, rehabilitated, and conserved over the planning period. While the element includes these objectives for construction, it must also include estimates for rehabilitation and not limit conserved units to at-risk properties. In addition, the element must also include objectives for extremely low-income households.

- Quantified objectives by income level are included in the Housing Element on page 83. Beyond at-risk properties, the assessment in the Housing Element did not identify any rehabilitation need.

E. Public Participation

Local governments shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the Housing Element, and the element shall describe this effort. (Gov. Code, § 65583, subd.(c)(9).)

While the element includes a general summary of the public participation process, it must also demonstrate diligent efforts were made to involve all economic segments of the community in the development of the housing element. The element should be revised to discuss outreach to lower-income and special needs groups during the public participation efforts, solicitation efforts for survey responses, and participation in community workshops, and if translation services were provided.

- The Housing Element includes an expanded description of public participation and the County's efforts, completed and ongoing, to solicit comprehensive participation, in Appendix F.

F. Coastal Zone and Replacement Requirements

Coastal localities shall document the number of low- and moderate-income units converted or demolished, and the number of replacement units provided. (Gov. Code, § 65588, subd. (d).)

The element does not meet the statutory requirements. To determine whether the County's affordable housing stock in the coastal zone is being protected and provided as required by Government Code section 65588, the element must be revised to include the following:

1. The number of new housing units approved for construction within the coastal zone since January 1982.
2. The number of housing units for persons and families of low- and moderate-income required to be provided in new housing developments either within the coastal zone or within three miles.
3. The number of existing residential dwelling units occupied by low- and moderate-income households either within the coastal zone or three miles of the coastal zone that have been authorized to be demolished or converted since January 1982.
4. The number of residential dwelling units for low- and moderate-income households that have been required for replacement.

- This information is provided in Appendix A, on page A-42.

OTHER CHANGES

The following programs have been added to the draft Housing Element to better address the County's housing needs and goals.

HE 22.6, Farm Labor Housing Study and Strategy

HE 22.7, Preliminary Pescadero Community Plan Assessment

HE 22.8, Farm Labor Housing Sites Analysis and Regulatory Streamlining

HE 26.4, ADU Resource Center

HE 36.8, Submit an Equity Plan under HUD's new AFFH rule for the County of San Mateo

HE 39.4, Encourage Local Hiring







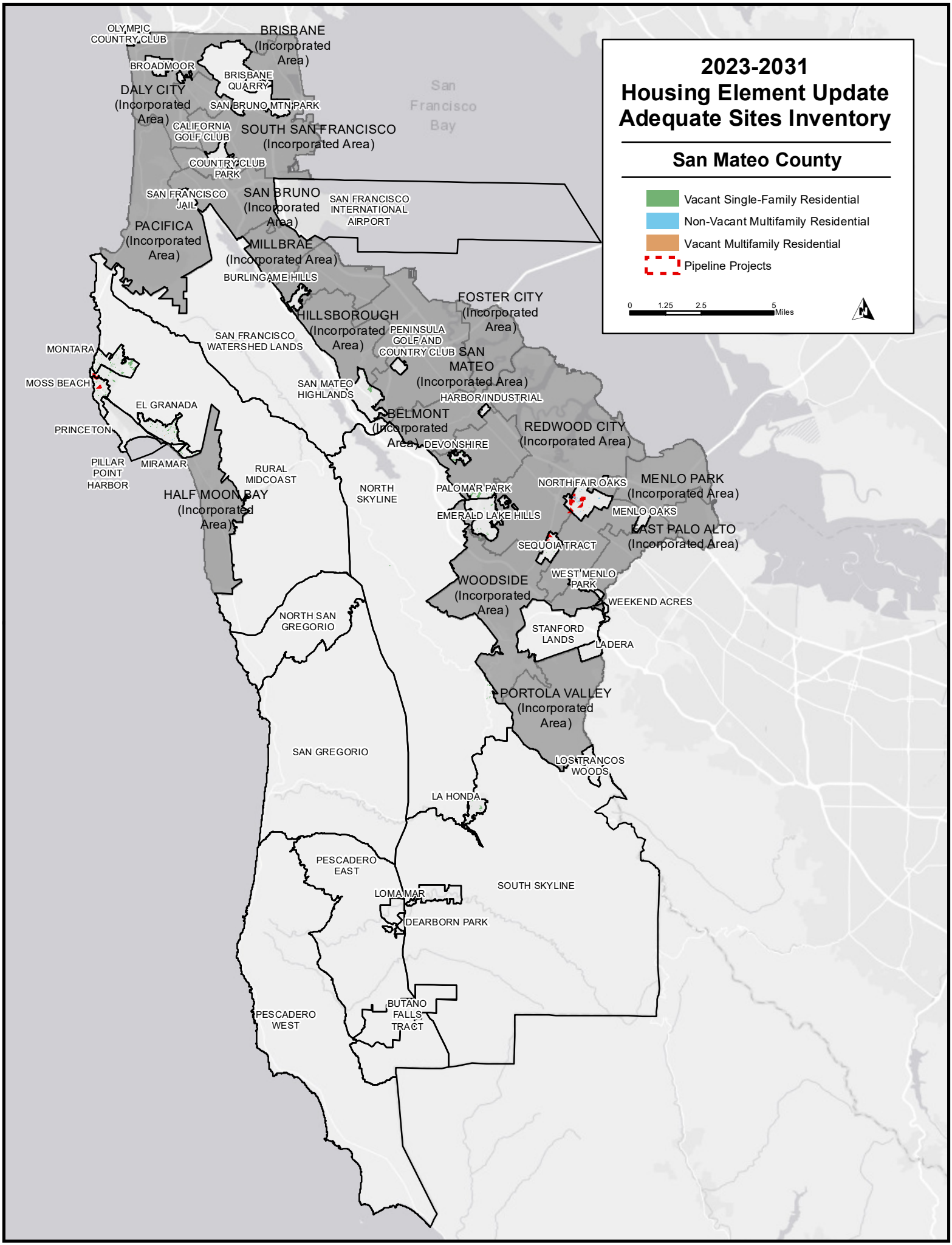
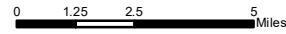
County of San Mateo - Planning and Building Department

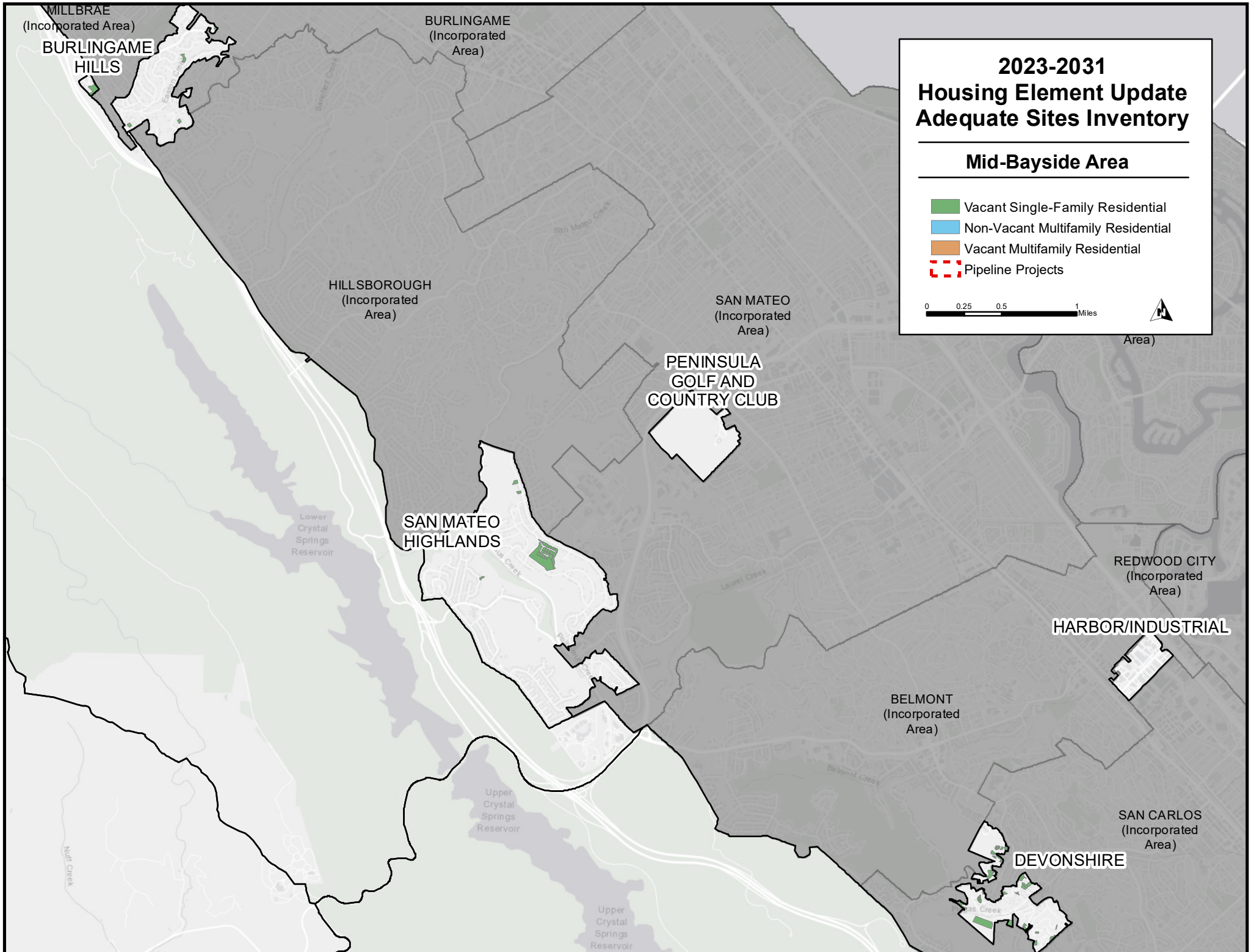
ATTACHMENT D

2023-2031 Housing Element Update Adequate Sites Inventory

San Mateo County

-  Vacant Single-Family Residential
-  Non-Vacant Multifamily Residential
-  Vacant Multifamily Residential
-  Pipeline Projects






**2023-2031
Housing Element Update
Adequate Sites Inventory**

Mid-Bayside Area

- Vacant Single-Family Residential
- Non-Vacant Multifamily Residential
- Vacant Multifamily Residential
- Pipeline Projects

0 0.25 0.5 1 Miles



MILLBRAE
(Incorporated Area)
**BURLINGAME
HILLS**

BURLINGAME
(Incorporated
Area)

HILLSBOROUGH
(Incorporated
Area)

SAN MATEO
(Incorporated
Area)

**PENINSULA
GOLF AND
COUNTRY CLUB**

**SAN MATEO
HIGHLANDS**

REDWOOD CITY
(Incorporated
Area)

HARBOR/INDUSTRIAL

BELMONT
(Incorporated
Area)

SAN CARLOS
(Incorporated
Area)

DEVONSHIRE

Lower
Crystal
Springs
Reservoir

Upper
Crystal
Springs
Reservoir

Upper
Crystal
Springs
Reservoir

Napa
Creek

San Mateo
Creek

San Mateo
Creek





Laurel
Creek

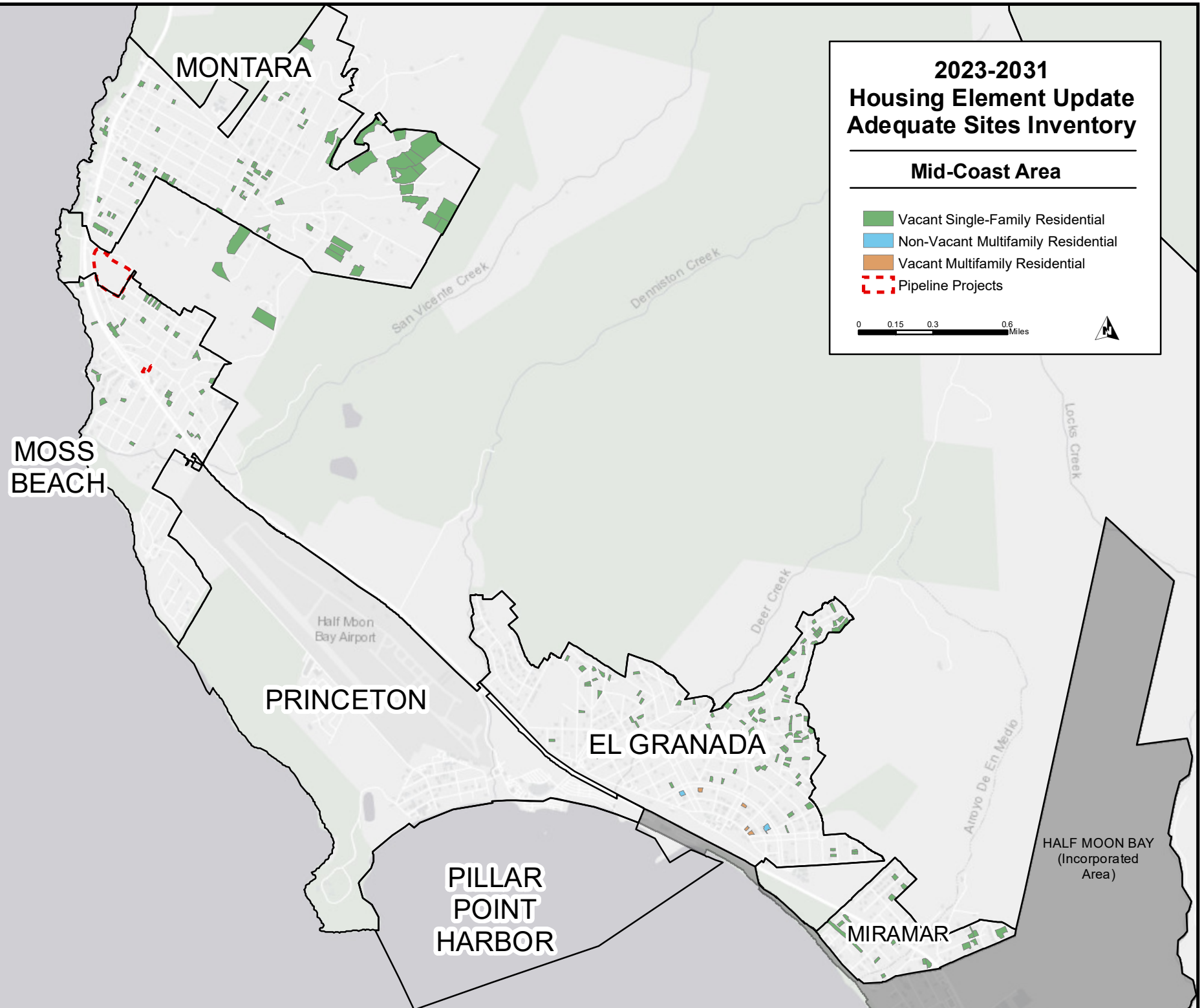
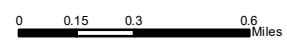
Belmont
Creek

San Carlos
Creek

2023-2031 Housing Element Update Adequate Sites Inventory

Mid-Coast Area

-  Vacant Single-Family Residential
-  Non-Vacant Multifamily Residential
-  Vacant Multifamily Residential
-  Pipeline Projects



MONTARA

MOSS
BEACH

PRINCETON

EL GRANADA

PILLAR
POINT
HARBOR

MIRAMAR

HALF MOON BAY
(Incorporated
Area)

San Vicente Creek

Demmiston Creek

Deer Creek

Arroyo De En Medio

Locks Creek

Half Moon
Bay Airport

OLYMPIC
COUNTRY
CLUB

BROADMOOR

DALY CITY
(Incorporated
Area)

UNINCORPORATED
COLMA

SAN BRUNO
MTN PARK

BRISBANE
QUARRY

COLMA
(Incorporated
Area)

SOUTH SAN FRANCISCO
(Incorporated Area)

CALIFORNIA
GOLF CLUB

COUNTRY CLUB PARK

PACIFICA
(Incorporated
Area)





SAN BRUNO
(Incorporated
Area)

SAN FRANCISCO
JAIL

SAN FRANCISCO
INTERNATIONAL
AIRPORT

2023-2031 Housing Element Update Adequate Sites Inventory

North County Area





-  Vacant Single-Family Residential
-  Non-Vacant Multifamily Residential
-  Vacant Multifamily Residential
-  Pipeline Projects

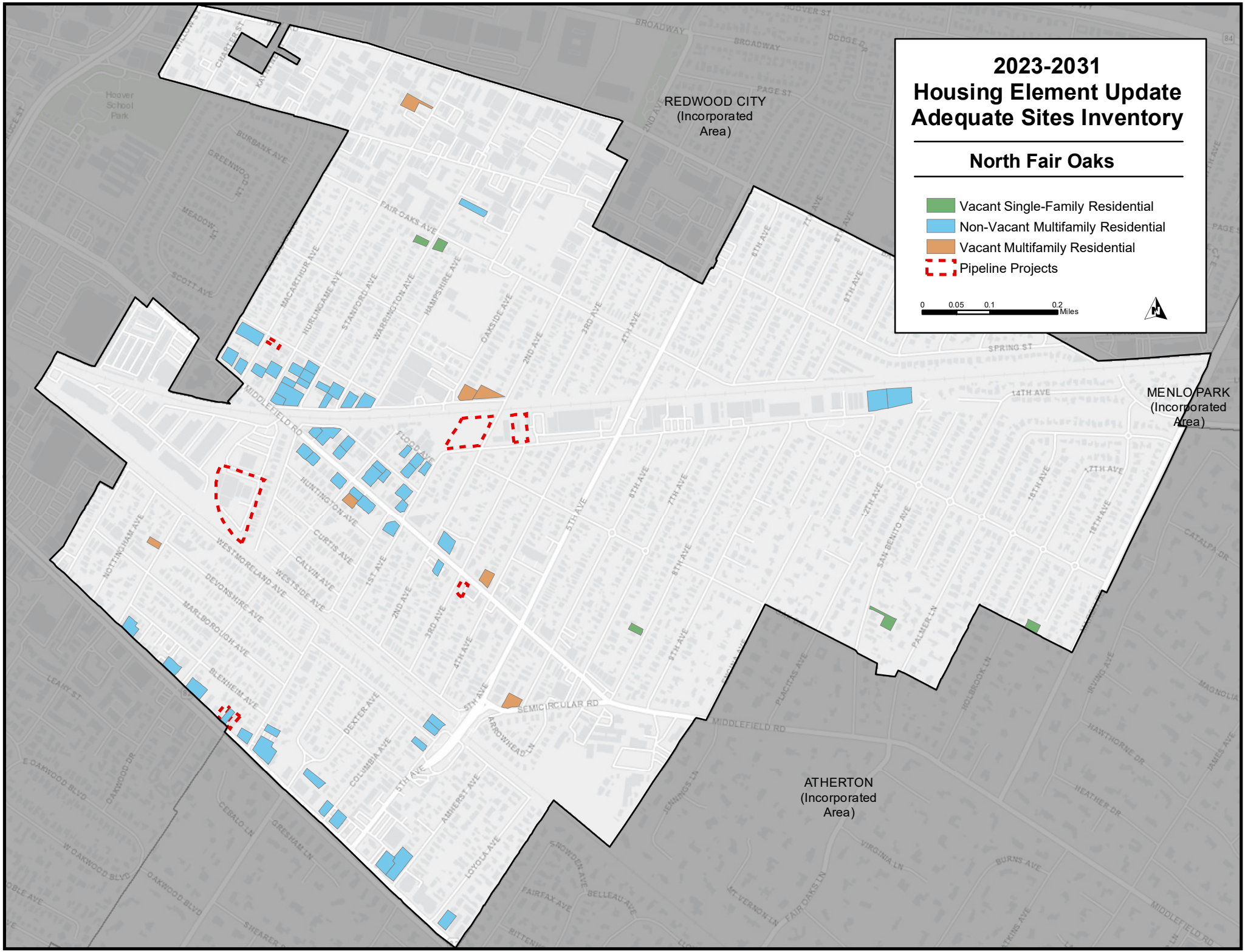
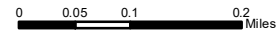
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2023-2031 Housing Element Update Adequate Sites Inventory





North Fair Oaks

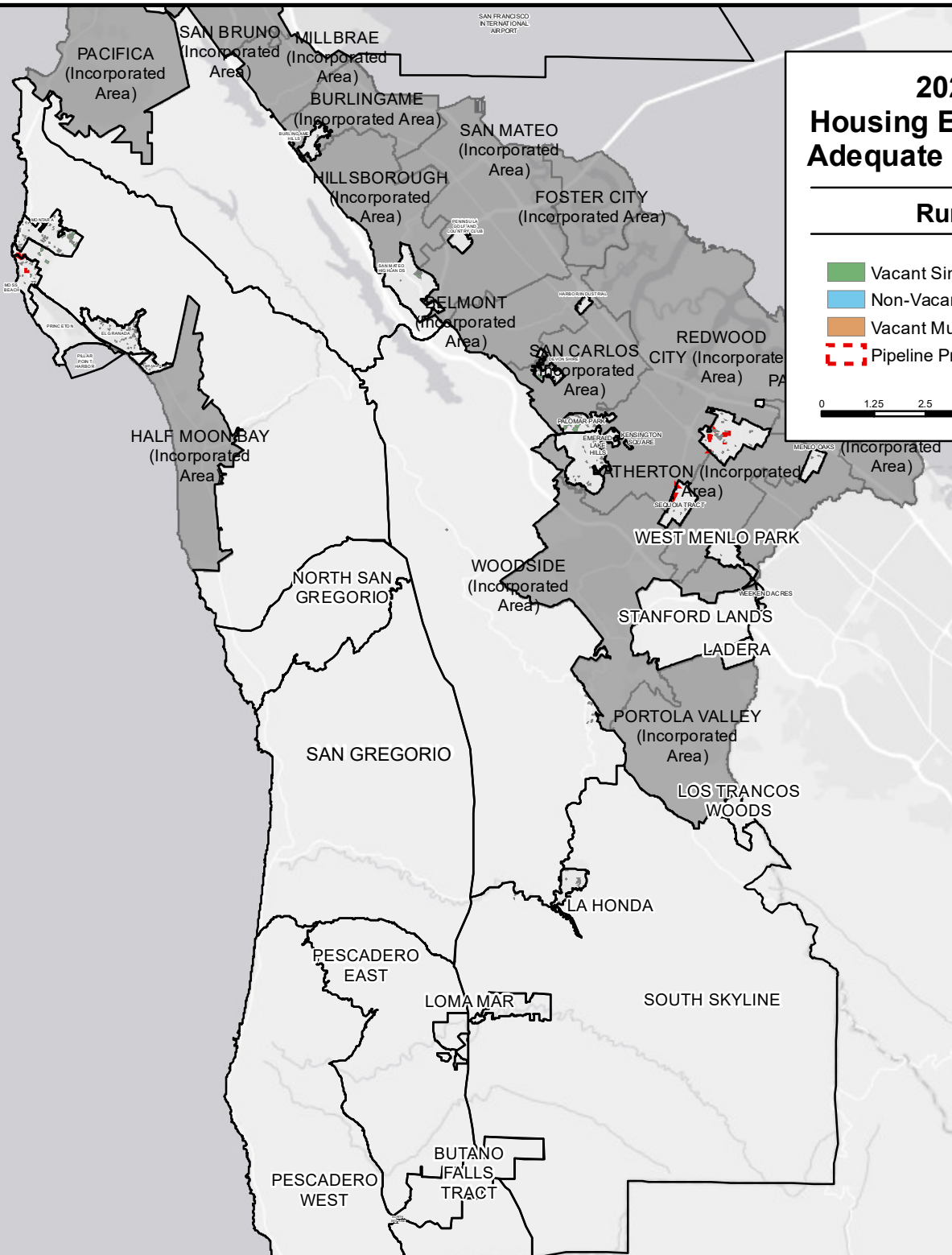
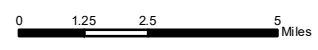
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-  Non-Vacant Multifamily Residential
-  Vacant Multifamily Residential
-  Pipeline Projects

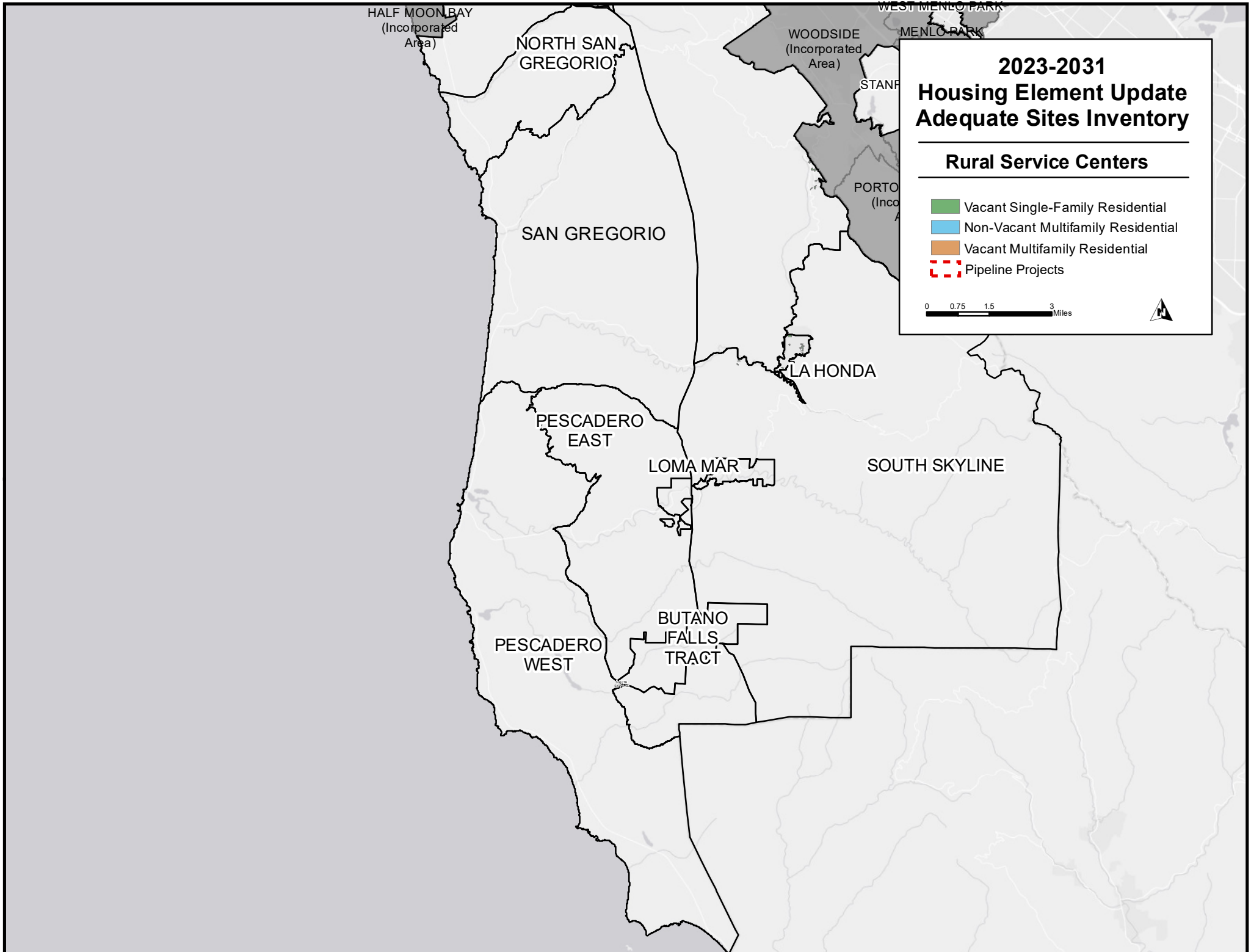


2023-2031 Housing Element Update Adequate Sites Inventory

Rural Area





-  Vacant Single-Family Residential
-  Non-Vacant Multifamily Residential
-  Vacant Multifamily Residential
-  Pipeline Projects

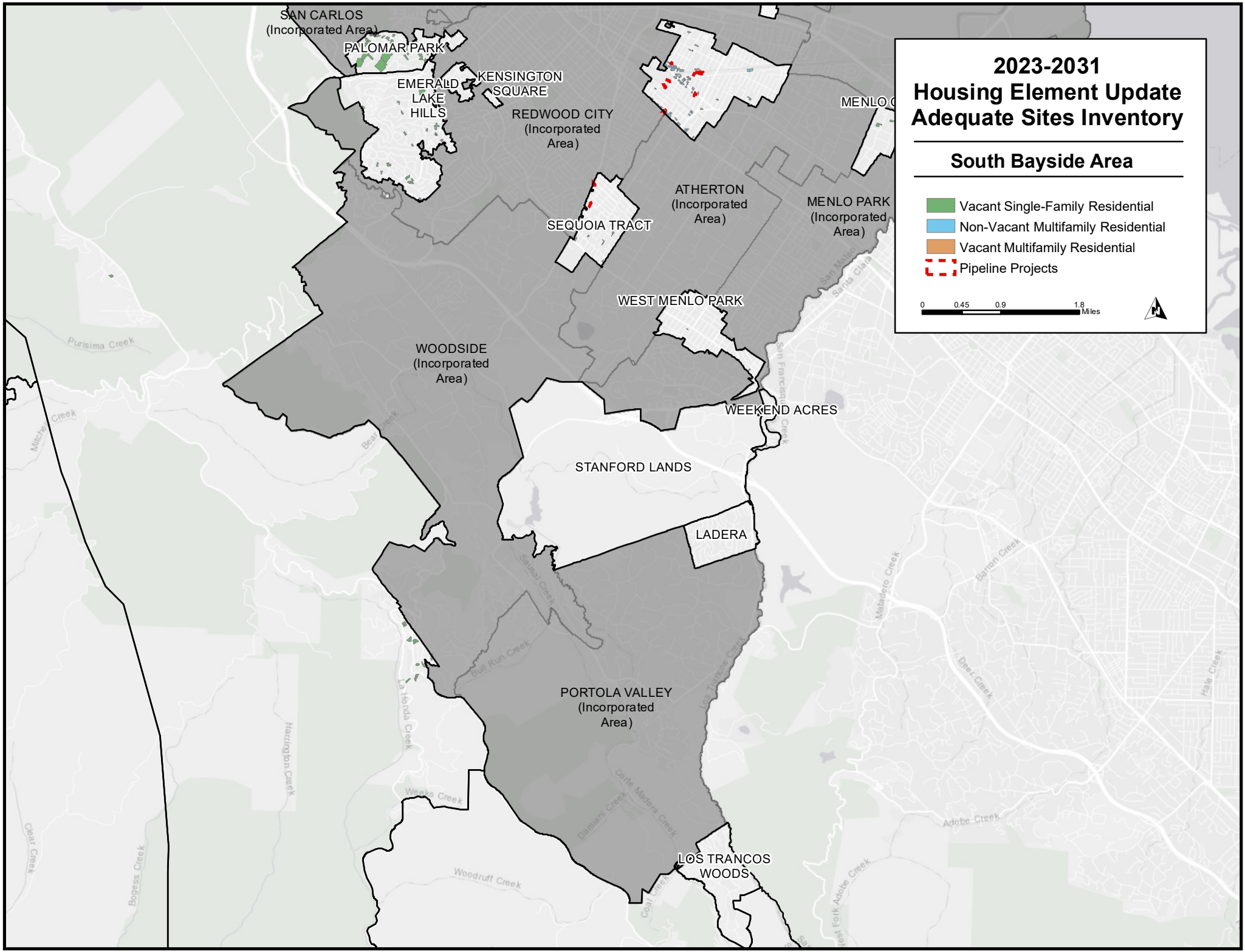
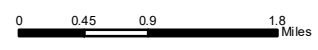


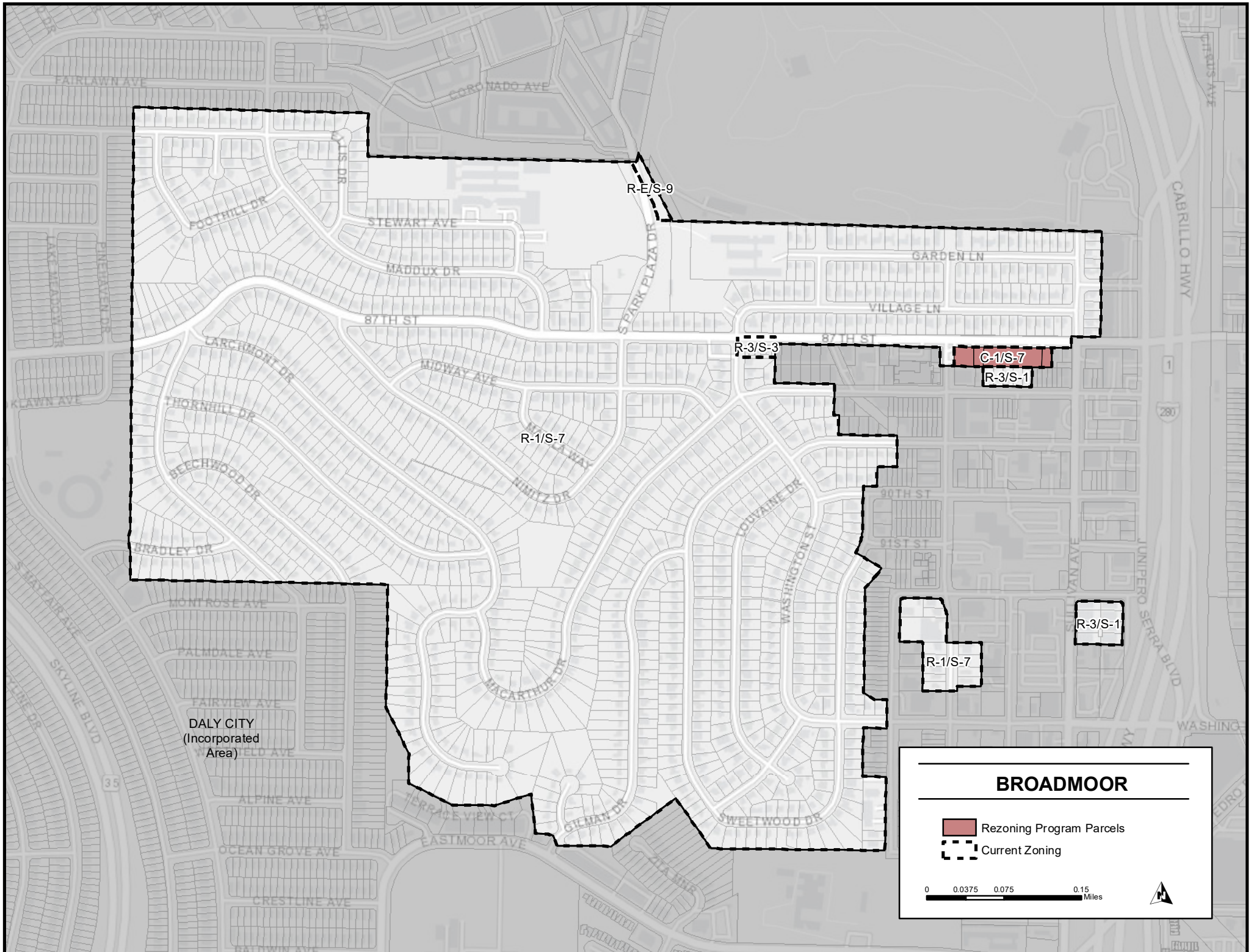


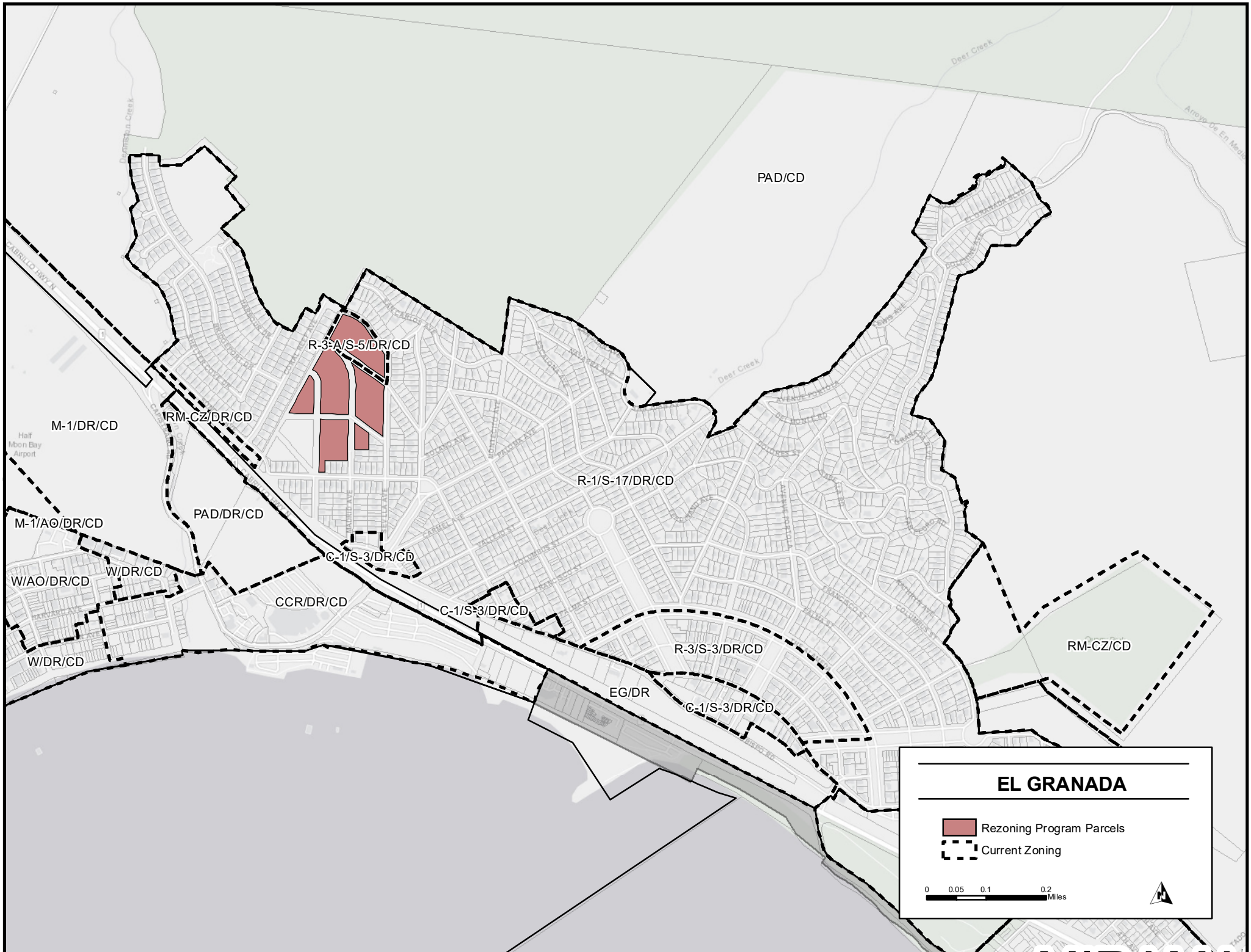
2023-2031 Housing Element Update Adequate Sites Inventory

South Bayside Area



-  Vacant Single-Family Residential
-  Non-Vacant Multifamily Residential
-  Vacant Multifamily Residential
-  Pipeline Projects

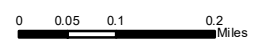


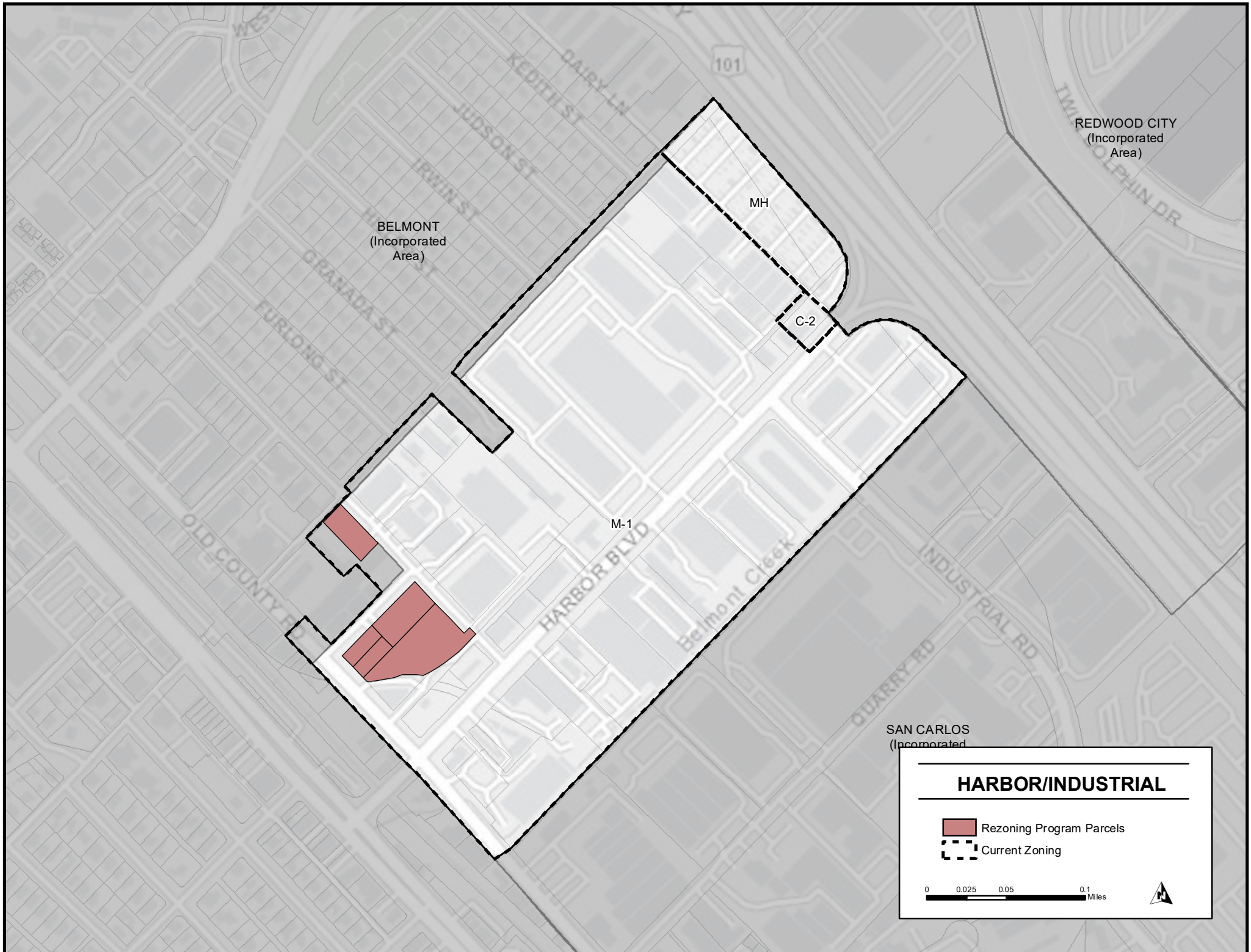






EL GRANADA

-  Rezoning Program Parcels
-  Current Zoning




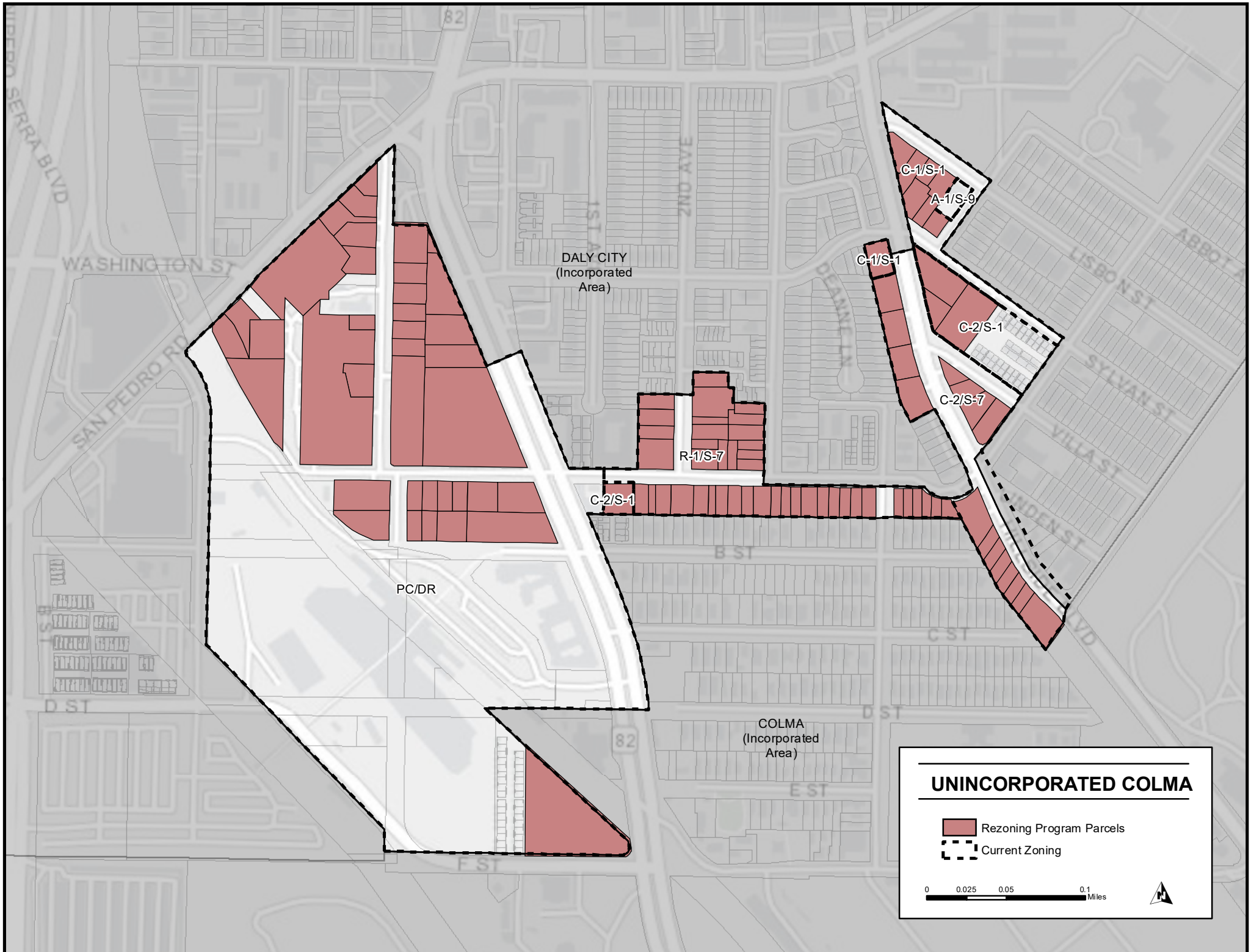


HARBOR/INDUSTRIAL

-  Rezoning Program Parcels
-  Current Zoning

0 0.025 0.05 0.1 Miles








DALY CITY
(Incorporated
Area)

COLMA
(Incorporated
Area)

UNINCORPORATED COLMA

-  Rezoning Program Parcels
-  Current Zoning

0 0.025 0.05 0.1 Miles





County of San Mateo - Planning and Building Department

ATTACHMENT E

County of San Mateo
Planning and Building Department

**INITIAL STUDY
ENVIRONMENTAL EVALUATION CHECKLIST**
(To Be Completed by Planning Department)

1. **Project Title:** San Mateo County 2022-2031 Housing Element Update
2. **County File Number:** N/A
3. **Lead Agency Name and Address:** San Mateo County Planning and Building Department, 455 County Center, Redwood City CA 94063
4. **Contact Person and Phone Number:** William Gibson, 628-222-3082
5. **Project Location:** Unincorporated San Mateo County, countywide
6. **Assessor's Parcel Number and Size of Parcel:** N/A; countywide
7. **Project Sponsor's Name and Address:** San Mateo County Planning and Building Department, 455 County Center, Redwood City CA 94063
8. **Name of Person Undertaking the Project or Receiving the Project Approval (if different from Project Sponsor):** N/A
9. **General Plan Designation:** Varies; countywide
10. **Zoning:** Varies; countywide
11. **Description of the Project:** The project is a General Plan Amendment replacing the current Housing Element of the County's General Plan, covering the period from 2014 to 2022, with a revised Housing Element covering the state-mandated planning period from 2022 to 2031.

State law requires jurisdictions to periodically update the Housing Element of their General Plan; the update schedule, process and the contents of the Housing Element are also regulated by state law. The proposed updated Housing Element covers the period from 2022 to 2031, and upon adoption will replace the prior Housing Element, adopted by the Board of Supervisors in 2014. Consistent with state law, the revised Housing Element: (1) provides an updated assessment of the County's existing and projected housing needs; (2) identifies opportunities and constraints relevant to meeting those needs; (3) evaluates the effectiveness of current housing programs; and (4) develops new policies, programs, and quantified objectives to meet identified housing needs in unincorporated areas. The draft Housing Element is organized into an introduction and executive summary, two main sections, and multiple appendices, as described below:

- Introduction and Executive Summary. This section explains the scope and purpose of the Housing Element and its relationship to other County plans and programs, and briefly summarizes the contents of the Housing Element.

- Housing Plan. This section includes the County housing goals, policies and programs intended to address the County’s identified housing needs and address barriers to the provision of housing, and the County’s quantified objectives for housing development over the 2022-2031 period.
- Regional Housing Needs Allocation. This section summarizes the County’s Regional Housing Needs Allocation (RHNA, discussed below), and describes the County’s ability to meet its RHNA obligations, including a summary of the RHNA analysis contained in Appendix E.
- Appendix A: Demographics, Housing Conditions and Housing Needs. This section contains detailed assessment of current and projected housing conditions and housing needs in the unincorporated County, for all areas and all segments of County population.
- Appendix B: Constraints to Housing Production. This section assesses various constraints to housing production, including governmental and non-governmental constraints, environmental factors, and others.
- Appendix C: Housing Resources. This section describes existing resources for housing production and assistance, including governmental and non-governmental resources.
- Appendix D: Review of 5th Cycle Housing Element. This section summarizes the status and outcomes of the policies and programs incorporated in the 2014-2022 Housing Element (also referred to as the “5th Cycle Housing Element”).
- Appendix E: Adequate Housing Sites Inventory. Appendix E presents a full inventory of all sites available for development or redevelopment as housing over the next eight years, to meet the County’s 2022-2031 RHNA for all income levels.
- Appendix F: Public Participation and Input. This appendix summarizes the outreach, participation, and public input and comment involved in updated the Housing Element, as well as the response to input and comment incorporated in the draft Housing Element.
- Appendix G: Fair Housing Assessment. Appendix G and Appendices G-1 through G-5, listed below, constitute an assessment of fair housing conditions and needs in the unincorporated County, and summarizes policies intended to address fair housing issues.
- Appendix G-1: Affirmatively Furthering Fair Housing (AFFH) Maps and Tables
- Appendix G-2: Resident Survey
- Appendix G-3: Disparate Access to Educational Opportunities
- Appendix G-4: State Fair Housing Laws and Regulations
- Appendix G-5: Fair Housing Action Plan

A core component of the Housing Element is a demonstration that the County can meet its Regional Housing Needs Allocation, or “RHNA.” The RHNA is the County’s share of overall regional housing need, as determined by the State of California and the Association of Bay Area Governments, for the eight years of the Housing Element cycle. For the 2022-2031 cycle, the unincorporated County has been assigned a RHNA of 2,833 units, divided into four income levels: very low, low, moderate, and above moderate. The Housing Element must show that there are sufficient feasibly developable or redevelopable sites, in combination with development already in the pipeline and projected accessory dwelling unit and SB 9¹

1. SB 9 is a state law adopted in 2021, allowing small-scale multifamily development and subdivisions of existing single-family zoned properties.

development to match the County's RHNA, in total and by income category, or must incorporate policies to address any shortfall.

The Adequate Sites Inventory appendix contains the Housing Element's detailed assessment of all developable and redevelopable parcels in the unincorporated County, as well as an inventory of projects currently underway, and projections of likely development of accessory dwelling units and small-scale multifamily development pursuant to SB 9 over the next eight years. While the County has sufficient development capacity to meet its overall RHNA, there is a shortfall in capacity for lower-income categories. This shortfall is addressed by recommending the future rezoning of three County areas from commercial, industrial, and low-density residential zoning to zoning for by-right residential development at densities of over 80 and up to 120 units per acre. However, these rezonings are incorporated in the Housing Element as future programs which will be initiated at a later date, pursuant to subsequent discretionary approvals, and accompanied by separate environmental review.

The updated Housing Element is a policy document, and its adoption would not, in itself, produce any change in the physical environment or any environmental impacts. The Housing Element contains an inventory of existing and future programs intended to address the County's housing needs, but does not in itself alter any land use or development regulations, impact the developability or development intensity of any property, or directly or indirectly cause any development to occur. As noted, the Housing Element does propose that the County undertake several rezoning future rezoning programs that would alter the type and intensity of development allowed in three areas of the County, in order to meet a shortfall of sites for the development of higher-density housing suitable for lower-income groups. However, these programs, when implemented, would constitute separate discretionary legislative acts accompanied by separate, complete environmental review. Adoption of the Housing Element constitutes neither approval nor adoption of the proposed future rezonings, and any analysis of the potential environmental effects of such rezonings is speculative at this time. In addition, any development assisted or advanced by programs included in the Housing Element would be subject to all relevant County and other land use, development, and other regulations. Some of that development may be permitted by right, or on a ministerial basis, while the remainder may be discretionary and subject to its own separate environmental review, but all such development potential, and any related environmental impact, is part of the current existing condition—the Housing Element would not modify any potentially applicable zoning regulations or other development regulations.

The updated Housing Element [Introduction](#) and [Executive Summary](#) are attached, and provide a more detailed project description. The full draft San Mateo County 2022-2031 Housing Element is available here: <https://www.smcgov.org/media/142367/download?attachment>

12. **Surrounding Land Uses and Setting:** Various (countywide)
13. **Other Public Agencies Whose Approval is Required:** No other agency approvals are required prior to adoption of the updated Housing Element. However, the City/County Association of Governments and Airport Land Use Commission must review the Housing Element for compliance with airport land use policies, and the California Department of

Housing and Community Development must review the Housing Element for compliance with state law.

14. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?** In accordance with the requirements of Public Resources Code 21080.3.1, the County has notified those Native American tribes both traditionally and culturally affiliated with the project area, including those tribes which have requested notification for all relevant projects. These tribes were notified via certified mail and email. As of this date, no responses have been received.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” or “Significant Unless Mitigated” as indicated by the checklist on the following pages.

	Aesthetics		Energy		Public Services
	Agricultural and Forest Resources		Hazards and Hazardous Materials		Recreation
	Air Quality		Hydrology/Water Quality		Transportation
	Biological Resources		Land Use/Planning		Tribal Cultural Resources
	Climate Change		Mineral Resources		Utilities/Service Systems
	Cultural Resources		Noise		Wildfire
	Geology/Soils		Population/Housing		Mandatory Findings of Significance

EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than

significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an Environmental Impact Report (EIR) is required.

4. “Negative Declaration: Less Than Significant with Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in 5. below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other California Environmental Quality Act (CEQA) process, an effect has been adequately analyzed in an earlier EIR or negative declaration (Section 15063(c)(3)(D)). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are “Less Than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources. Sources used or individuals contacted should be cited in the discussion.

1. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:					
		<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
1.a.	Have a substantial adverse effect on a scenic vista, views from existing residential areas, public lands, water bodies, or roads?				x
Discussion: The updated Housing Element is a policy document, and its adoption would not, in itself, produce any change in the physical environment or any environmental impacts. The Housing Element contains an inventory of existing and future programs intended to address the County’s					

housing needs, but does not in itself alter any land use or development regulations, impact the developability or development intensity of any property, or directly or indirectly cause any development to occur. As noted, the Housing Element does propose that the County undertake several rezoning future rezoning programs that would alter the type and intensity of development allowed in three areas of the County, in order to meet a shortfall of sites for the development of higher-density housing suitable for lower-income groups. However, these programs, when implemented, would constitute separate discretionary legislative acts accompanied by separate, complete environmental review. Adoption of the Housing Element constitutes neither approval nor adoption of the proposed future rezonings, and any analysis of the potential environmental effects of such rezonings is speculative at this time. In addition, any development assisted or advanced by programs included in the Housing Element would be subject to all relevant County and other land use, development, and other regulations. Some of that development may be permitted by right, or on a ministerial basis, while the remainder may be discretionary and subject to its own separate environmental review, but all such development potential, and any related environmental impact, is part of the current existing condition—the Housing Element would not modify any potentially applicable zoning regulations or other development regulations.

The project has no potential to impact scenic vista, views from existing residential areas, public lands, water bodies, or roads.

Source:

1.b. Substantially damage or destroy scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				x
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Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.

The project has no potential to substantially damage or destroy scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

Source:

1.c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings, such as significant change in topography or ground surface relief features, and/or development on a ridgeline? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				x
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<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to substantially degrade the existing visual character or quality of public views of the site and its surroundings, such as significant change in topography or ground surface relief features, and/or development on a ridgeline in non-urban areas, nor to conflict applicable zoning and other regulations governing scenic quality in urban areas.</p> <p>Source:</p>					
1.d.	Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.</p> <p>Source:</p>					
1.e.	Be adjacent to a designated Scenic Highway or within a State or County Scenic Corridor?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to cause, or induce development adjacent to a designated Scenic Highway or within a State or County Scenic Corridor.</p> <p>Source:</p>					
1.f.	If within a Design Review District, conflict with applicable General Plan or Zoning Ordinance provisions?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to conflict with applicable General Plan or Zoning Ordinance provisions.</p> <p>Source:</p>					
1.g.	Visually intrude into an area having natural scenic qualities?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to visually intrude into an area having natural scenic qualities.</p> <p>Source:</p>					

2. AGRICULTURAL AND FOREST RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
2.a. For lands outside the Coastal Zone, convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				x

Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.

The project has no potential to convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.

Source:

2.b. Conflict with existing zoning for agricultural use, an existing Open Space Easement, or a Williamson Act contract?				x
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Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.

The project has no potential to conflict with existing zoning for agricultural use, an existing Open Space Easement, or a Williamson Act contract.

Source:

2.c. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forestland to non-forest use?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forestland to non-forest use.</p> <p>Source:</p>				
2.d. For lands within the Coastal Zone, convert or divide lands identified as Class I or Class II Agriculture Soils and Class III Soils rated good or very good for artichokes or Brussels sprouts?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to convert or divide lands identified as Class I or Class II Agriculture Soils and Class III Soils rated good or very good for artichokes or Brussels sprouts.</p> <p>Source:</p>				
2.e. Result in damage to soil capability or loss of agricultural land?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to result in damage to soil capability or loss of agricultural land.</p> <p>Source:</p>				
<p>2.f. Conflict with existing zoning for, or cause rezoning of, forestland (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?</p> <p><i>Note to reader: This question seeks to address the economic impact of converting forestland to a non-timber harvesting use.</i></p>				x

Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.

The project has no potential to conflict with existing zoning for, or cause rezoning of, forestland (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)).

Source:

3. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
3.a. Conflict with or obstruct implementation of the applicable air quality plan?				x

Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.

The project has no potential to conflict with or obstruct implementation of the applicable air quality plan.

Source:

3.b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard?				x
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Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.

The project has no potential to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard.

Source:

3.c. Expose sensitive receptors to substantial pollutant concentrations, as defined by the Bay Area Air Quality Management District?				x
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Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.

The project has no potential to expose sensitive receptors to substantial pollutant concentrations, as defined by the Bay Area Air Quality Management District.

Source:

3.d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?				x
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Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.

The project has no potential to result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Source:

4. BIOLOGICAL RESOURCES. Would the project:

	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
4.a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service or National Marine Fisheries Service?				x

Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.

The project has no potential to have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service or National Marine Fisheries Service.

Source:

4.b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the				x
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California Department of Fish and Wildlife or U.S. Fish and Wildlife Service or National Marine Fisheries Service?				
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service or National Marine Fisheries Service.</p> <p>Source:</p>				
4.c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.</p> <p>Source:</p>				
4.d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident migratory wildlife corridors, or impede the use of native wildlife nursery sites?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident migratory wildlife corridors, or impede the use of native wildlife nursery sites.</p> <p>Source:</p>				
4.e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (including the County Heritage and Significant Tree Ordinances)?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p>				

The project has no potential to conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (including the County Heritage and Significant Tree Ordinances).

Source:

4.f.	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, other approved local, regional, or state habitat conservation plan?				X
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Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.

The project has no potential to conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, other approved local, regional, or state habitat conservation plan.

Source:

4.g.	Be located inside or within 200 feet of a marine or wildlife reserve?				X
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Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts..

The project has no potential to cause or induce development inside or within 200 feet of a marine or wildlife reserve.

Source:

4.h.	Result in loss of oak woodlands or other non-timber woodlands?				X
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Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.

The project has no potential to result in loss of oak woodlands or other non-timber woodlands.

Source:

5. CULTURAL RESOURCES. Would the project:

	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
5.a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?				X

<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.</p> <p>Source:</p>					
5.b.	Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Section 15064.5?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Section 15064.5.</p> <p>Source:</p>					
5.c.	Disturb any human remains, including those interred outside of formal cemeteries?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to disturb any human remains, including those interred outside of formal cemeteries.</p> <p>Source:</p>					

<p>6. ENERGY. Would the project:</p>					
		Potentially Significant Impacts	Significant Unless Mitigated	Less Than Significant Impact	No Impact
6.a.	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.</p>					

Source:					
6.b.	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to conflict with or obstruct a state or local plan for renewable energy or energy efficiency.</p> <p>Source:</p>					

7. GEOLOGY AND SOILS. Would the project:					
		Potentially Significant Impacts	Significant Unless Mitigated	Less Than Significant Impact	No Impact
7.a.	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving the following, or create a situation that results in:				x
	<p>i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?</p> <p><i>Note: Refer to Division of Mines and Geology Special Publication 42 and the County Geotechnical Hazards Synthesis Map.</i></p>				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving the rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault.</p> <p>Source:</p>					
	ii. Strong seismic ground shaking?				x

<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death due to strong seismic ground shaking.</p> <p>Source:</p>				
iii. Seismic-related ground failure, including liquefaction and differential settling?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death due to seismic-related ground failure, including liquefaction and differential settling.</p> <p>Source:</p>				
iv. Landslides?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death due to landslides.</p> <p>Source:</p>				
v. Coastal cliff/bluff instability or erosion? <i>Note to reader: This question is looking at instability under current conditions. Future, potential instability is looked at in Section 7 (Climate Change).</i>				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death due to coastal cliff/bluff instability or erosion.</p> <p>Source:</p>				
7.b. Result in substantial soil erosion or the loss of topsoil?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to result in substantial soil erosion or the loss of topsoil.</p>				

Source:					
7.c.	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, severe erosion, liquefaction or collapse?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to cause or induce development on sites located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, severe erosion, liquefaction or collapse.</p> <p>Source:</p>					
7.d.	Be located on expansive soil, as defined in Table 18-1-B of Uniform Building Code, creating substantial direct or indirect risks to life or property?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to cause, induce or otherwise implicate development on expansive soil, as defined in Table 18-1-B of Uniform Building Code, creating substantial direct or indirect risks to life or property.</p> <p>Source:</p>					
7.e.	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to cause or induce development on sites with soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.</p> <p>Source:</p>					
7.f.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				x

Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.

The project has no potential to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Source:

8. CLIMATE CHANGE. Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
8.a. Generate greenhouse gas (GHG) emissions (including methane), either directly or indirectly, that may have a significant impact on the environment?				X
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to generate greenhouse gas (GHG) emissions (including methane), either directly or indirectly, that may have a significant impact on the environment.</p> <p>Source:</p>				
8.b. Conflict with an applicable plan (including a local climate action plan), policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				X
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to conflict with an applicable plan (including a local climate action plan), policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases</p> <p>Source:</p>				
8.c. Result in the loss of forestland or conversion of forestland to non-forest use, such that it would release significant amounts of GHG emissions, or significantly reduce GHG sequestering?				X
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p>				

<p>The project has no potential to result in the loss of forestland or conversion of forestland to non-forest use, such that it would release significant amounts of GHG emissions, or significantly reduce GHG sequestering</p> <p>Source:</p>					
8.d.	Expose new or existing structures and/or infrastructure (e.g., leach fields) to accelerated coastal cliff/bluff erosion due to rising sea levels?				X
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to expose new or existing structures and/or infrastructure (e.g., leach fields) to accelerated coastal cliff/bluff erosion due to rising sea levels.</p> <p>Source:</p>					
8.e.	Expose people or structures to a significant risk of loss, injury or death involving sea level rise?				X
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to expose people or structures to a significant risk of loss, injury or death involving sea level rise.</p> <p>Source:</p>					
8.f.	Place structures within an anticipated 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				X
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to cause or induce development within a 100-year flood hazard area.</p> <p>Source:</p>					
8.g.	Place within an anticipated 100-year flood hazard area structures that would impede or redirect flood flows?				X
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to place within an anticipated 100-year flood hazard area structures that would impede or redirect flood flows.</p> <p>Source:</p>					

9. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
9.a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials (e.g., pesticides, herbicides, other toxic substances, or radioactive material)?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.</p> <p>Source:</p>				
9.b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.</p> <p>Source:</p>				
9.c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.</p> <p>Source:</p>				

9.d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and has no potential to create a significant hazard to the public or the environment.</p> <p>Source:</p>				
9.e. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to result in a safety hazard or excessive noise for people residing or working in the project area.</p> <p>Source:</p>				
9.f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.</p> <p>Source:</p>				
9.g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p>				

<p>The project has no potential to expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.</p> <p>Source:</p>					
9.h.	Place housing within an existing 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to place housing within an existing 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map.</p> <p>Source:</p>					
9.i.	Place within an existing 100-year flood hazard area structures that would impede or redirect flood flows?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to place within an existing 100-year flood hazard area structures that would impede or redirect flood flows.</p> <p>Source:</p>					
9.j.	Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam impact.</p> <p>Source:</p>					
9.k.	Inundation by seiche, tsunami, or mudflow?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to cause or be impacted by inundation by seiche, tsunami, or mudflow.</p> <p>Source:</p>					

10. HYDROLOGY AND WATER QUALITY. Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
10.a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality (consider water quality parameters such as temperature, dissolved oxygen, turbidity and other typical stormwater pollutants (e.g., heavy metals, pathogens, petroleum derivatives, synthetic organics, sediment, nutrients, oxygen-demanding substances, and trash))?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.</p> <p>Source:</p>				
10.b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of any basin.</p> <p>Source:</p>				
10.c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would:				x
i. Result in substantial erosion or siltation on- or off-site;				x

<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to substantially alter the existing drainage pattern of any sites or areas, including through the alteration of the course of a stream or river or through the addition of impervious surfaces.</p> <p>The project has no potential to result in substantial erosion or siltation on or off of any sites.</p> <p>Source:</p>				
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off of any sites.</p> <p>Source:</p>				
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.</p> <p>Source:</p>				
iv. Impede or redirect flood flows?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to impede or redirect flood flows.</p> <p>Source:</p>				
10.d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p>				

<p>The project has no potential to risk release of pollutants due to inundation in flood hazard, tsunami, or seiche zones.</p> <p>Source:</p>				
10.e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.</p> <p>Source:</p>				
10.f. Significantly degrade surface or groundwater water quality?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to significantly degrade surface or groundwater water quality.</p> <p>Source:</p>				
10.g. Result in increased impervious surfaces and associated increased runoff?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to impact result in increased impervious surfaces and associated increased runoff.</p> <p>Source:</p>				

11. LAND USE AND PLANNING. Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
11.a. Physically divide an established community?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to physically divide an established community.</p>				

Source:				
11.b. Cause a significant environmental impact due to a conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to cause a significant environmental impact due to a conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect.</p> <p>Source:</p>				
11.c. Serve to encourage off-site development of presently undeveloped areas or increase development intensity of already developed areas (examples include the introduction of new or expanded public utilities, new industry, commercial facilities or recreation activities)?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to encourage off-site development of presently undeveloped areas or increase development intensity of already developed areas.</p> <p>Source:</p>				

12. MINERAL RESOURCES. Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
12.a. Result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State.</p>				

Source:				
12.b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.</p> <p>Source:</p>				

13. NOISE. Would the project result in:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
13.a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.</p> <p>Source:</p>				
13.b. Generation of excessive ground-borne vibration or ground-borne noise levels?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to generate excessive ground-borne vibration or ground-borne noise levels.</p> <p>Source:</p>				
13.c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been				x

<p>adopted, within 2 miles of a public airport or public use airport, exposure to people residing or working in the project area to excessive noise levels?</p>				
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to expose people residing or working in the project area to excessive noise levels.</p> <p>Source:</p>				

<p>14. POPULATION AND HOUSING. Would the project:</p>				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<p>14.a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?</p>				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to Induce substantial unplanned population growth in an area, either directly or indirectly.</p> <p>Source:</p>				
<p>14.b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?</p>				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.</p> <p>Source:</p>				

<p>15. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, the need for new or physically altered governmental facilities, the construction of which could cause</p>

significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
15.a. Fire protection?				x
15.b. Police protection?				x
15.c. Schools?				x
15.d. Parks?				x
15.e. Other public facilities or utilities (e.g., hospitals, or electrical/natural gas supply systems)?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any public services.</p> <p>Source:</p>				

16. RECREATION. Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
16.a. Increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.</p> <p>Source:</p>				

16.b. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project does not include recreational facilities or have the potential to require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.</p> <p>Source:</p>				

17. TRANSPORTATION. Would the project:				
	Potentially Significant Impacts	Significant Unless Mitigated	Less Than Significant Impact	No Impact
17.a. Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, and parking?				X
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project does not conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, and parking.</p> <p>Source:</p>				
17.b. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b) <i>Criteria for Analyzing Transportation Impacts</i> ? <i>Note to reader: Section 15064.3 refers to land use and transportation projects, qualitative analysis, and methodology.</i>				X
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts</p> <p>The project has no potential to conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b).</p> <p>Source:</p>				

17.c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to substantially increase hazards due to a geometric design feature or incompatible uses.</p> <p>Source:</p>				
17.d. Result in inadequate emergency access?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to result in inadequate emergency access.</p> <p>Source:</p>				

18. TRIBAL CULTURAL RESOURCES. Would the project:				
	Potentially Significant Impacts	Significant Unless Mitigated	Less Than Significant Impact	No Impact
18.a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				x
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p>				

The project has no potential cause any change, including any substantial adverse change, in the significance of any tribal cultural resource, including those defined in Public Resources Code Section 21074 as either a site, feature, place or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe.

Source:

<p>ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in Subdivision (c) of Public Resources Code Section 5024.1. (In applying the criteria set forth in Subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.)</p>				<p>x</p>
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Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.

The project has no potential to impact any resource determined by the lead agency to be significant pursuant to criteria set forth in Subdivision (c) of Public Resources Code Section 5024.1.

Source:

19. UTILITIES AND SERVICE SYSTEMS. Would the project:

	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<p>19.a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?</p>				<p>x</p>

Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.

The project has no potential to require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

Source:				
19.b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to require water supply or implicate water capacity.</p> <p>Source:</p>				
19.c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to require any determination of capacity by any wastewater provider.</p> <p>Source:</p>				
19.d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to generate solid waste in any amount.</p> <p>Source:</p>				
19.e. Comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has not potential to implicate Federal, State, and local management and reduction statutes and regulations related to solid waste.</p> <p>Source:</p>				

20. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
	Potentially Significant Impacts	Significant Unless Mitigated	Less Than Significant Impact	No Impact
20.a. Substantially impair an adopted emergency response plan or emergency evacuation plan?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to substantially impair an adopted emergency response plan or emergency evacuation plan.</p> <p>Source:</p>				
20.b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.</p> <p>Source:</p>				
20.c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project does not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.</p> <p>Source:</p>				
20.d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a				x

result of runoff, post-fire slope instability, or drainage changes?				
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.</p> <p>Source:</p>				

21. MANDATORY FINDINGS OF SIGNIFICANCE.				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
21.a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				X
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.</p> <p>Source:</p>				
21.b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current				X

projects, and the effects of probable future projects.)				
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>Because the proposed Housing Element is a set of goals and policies to facilitate future projects that could occur within the timeframe of the General Plan, the proposed Housing Element itself represents the cumulative development scenario for the reasonably foreseeable future within the unincorporated area of the County. Therefore, the analysis presented in this Initial Study generally represents a cumulative analysis, and the project has no impacts that are individually limited, but cumulatively considerable.</p> <p>Source:</p>				
21.c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				x
<p>Discussion: See discussion in Section 1.a, which explains why the project will not directly or indirectly result in any foreseeable environmental impacts.</p> <p>The project has no potential to have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly.</p> <p>Source:</p>				

RESPONSIBLE AGENCIES. Check what agency has permit authority or other approval for the project.

AGENCY	YES	NO	TYPE OF APPROVAL
Bay Area Air Quality Management District		x	
Caltrans		x	
City		x	
California Coastal Commission		x	
California Department of Food and Agriculture		x	
County Airport Land Use Commission (ALUC)		x	
Other: _____			
National Marine Fisheries Service		x	
Regional Water Quality Control Board		x	
San Francisco Bay Conservation and Development Commission (BCDC)		x	

AGENCY	YES	NO	TYPE OF APPROVAL
Sewer/Water District:		x	
State Department of Fish and Wildlife		x	
State Department of Public Health		x	
State Water Resources Control Board		x	
U.S. Army Corps of Engineers (CE)		x	
U.S. Environmental Protection Agency (EPA)		x	
U.S. Fish and Wildlife Service		x	

MITIGATION MEASURES		
	<u>Yes</u>	<u>No</u>
Mitigation measures have been proposed in project application.		x
Other mitigation measures are needed.		x
The following measures are included in the project plans or proposals pursuant to Section 15070(b)(1) of the State CEQA Guidelines:		

DETERMINATION (to be completed by the Lead Agency).

On the basis of this initial evaluation:

I find the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared by the Planning Department.

I find that although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because of the mitigation measures in the discussion have been included as part of the proposed project. A MITIGATED NEGATIVE DECLARATION will be prepared.

I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.



(Signature)

Planner III

4/25/23

Date

(Title)



County of San Mateo - Planning and Building Department

ATTACHMENT F

RESOLUTION NO. _____

BOARD OF SUPERVISORS, COUNTY OF SAN MATEO, STATE OF CALIFORNIA

* * * * *

RESOLUTION ADOPTING A GENERAL PLAN AMENDMENT TO REPEAL THE 2014-2022 SAN MATEO COUNTY HOUSING ELEMENT OF THE GENERAL PLAN AND ADOPT THE 2023-2031 SAN MATEO COUNTY HOUSING ELEMENT OF THE GENERAL PLAN, IN COMPLIANCE WITH STATE LAW, AND DIRECTING SUBMITTAL OF THE ADOPTED HOUSING ELEMENT TO THE CALIFORNIA DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT

RESOLVED, by the Board of Supervisors of the County of San Mateo, State of California, that

WHEREAS, in Government Code Section 65589.5, the California Legislature declared that “California has a housing supply and affordability crisis of historic proportions. The consequences of failing to effectively and aggressively confront this crisis are hurting millions of Californians, robbing future generations of the chance to call California home, stifling economic opportunities for workers and businesses, worsening poverty and homelessness, and undermining the state’s environmental and climate objectives;” and

WHEREAS, State Housing Element Law (Government Code Sections 65580 et seq.) requires that the San Mateo County Board of Supervisors adopt a Housing Element for the 2023-2031 period to accommodate San Mateo County’s regional housing need allocation (RHNA) of 2,833 housing units, comprised of 811 very-low income units, 468 low-income units, 433 moderate-income units, and 1,121 above moderate-income units; and

WHEREAS, to comply with State Housing Element Law, San Mateo County has prepared the 2023-2031 Housing Element (the Housing Element) in compliance with State Housing Element Law and has identified sites that can accommodate housing units meeting the San Mateo County's RHNA; and

WHEREAS, as provided in Government Code Section 65350 et. seq., adoption of the Housing Element constitutes a General Plan amendment; and

WHEREAS, as provided in Government Code Sections 65352 – 65352.5, San Mateo County mailed public notice to all California Native American tribes provided by the Native American Heritage Commission and to other entities listed in the statute; and

WHEREAS, no California Native American tribe requested consultation; and

WHEREAS, in accordance with Government Code Section 65585(b), on November 17, 2022, San Mateo County posted the draft Housing Element and requested public comment for a 30-day review period, and on January 20, 2023, after responding to public comments, the County submitted the draft Housing Element to the State Department of Housing and Community Development (HCD) for its review; and

WHEREAS, on April 20, 2023, San Mateo County received a letter from HCD providing its findings regarding the draft Housing Element; and

WHEREAS, on March 26, 2024, San Mateo County published a revised draft Housing Element responding to HCD's findings and requested public comment on the draft; and

WHEREAS, the draft Housing Element has been reviewed for consistency with the other elements of the General Plan, including Vegetative, Water, Fish and Wildlife Resources; Soil Resources; Mineral Resources; Visual Quality; Historical and Archaeological Resources; Park and Recreation Resources; General Land Use; Urban Land Use; Rural Land Use; Water Supply; Wastewater; Transportation; Solid Waste; Housing; Natural and Man-made Hazards; Air Resources; and the Energy and Climate Change element, and is consistent with all other elements of the General Plan; and

WHEREAS, the draft Housing Element has been reviewed for consistency with the following area plans for specific unincorporated communities North Fair Oaks Community Plan, Emerald Lake Hills Community Plan, Montara-Moss Beach-EI Granada Community Plan, San Bruno Mountain General Plan Amendment, Skyline Area General Plan Amendment, and the Colma BART Station Area Plan, and is consistent with each of these area plans.

WHEREAS, on April 10, 2024, the Planning Commission held a duly and properly noticed public hearing and recommended that the Board of Supervisors adopt the Housing Element; and

WHEREAS, on April 24, 2024, the Board of Supervisors conducted a duly and properly noticed public hearing to take public testimony and consider this resolution regarding the proposed Housing Element, reviewed the Housing Element and all pertinent maps, documents and exhibits, including HCD's findings, San Mateo County's response to HCD's findings, the staff report, and all attachments, and oral and written public comments; and

NOW, THEREFORE, IT IS HEREBY DETERMINED AND ORDERED that the Board of Supervisors finds that, based on substantial evidence in the record:

1. The foregoing recitals are true and correct and are incorporated by reference into this action.
2. The adoption of the proposed General Plan amendment will not cause the General Plan to become internally inconsistent, in violation of Government Code Section 35300.5, for the reasons set forth in this resolution.
3. The adoption of the proposed General Plan amendment is in the public interest, as required by Government Code Section 65358(a) because the Housing Element includes a number of policies and programs that are in the public interest and will add to the housing stock and help alleviate the housing shortage.

4. The adoption of the proposed General Plan amendment will not exceed the annual limit on amendments specified by Government Code Section 65358(b) because adoption of the Housing Element is the first amendment of the element in 2024.
5. The Housing Element substantially complies with Housing Element Law, as provided in Government Code 65580 et seq., and contains all provisions required by State Housing Element Law, as shown in Attachment C to the Board memorandum accompanying this resolution.
6. Based on substantial evidence in the record, including extensive analysis of recent completed residential development and redevelopment both within the unincorporated County and in incorporated areas throughout San Mateo County, and extensive analysis of proposed and ongoing development and redevelopment projects both within the unincorporated County and in incorporated areas throughout San Mateo County, the existing uses on the non-vacant sites identified in the site inventory to accommodate the RHNA are likely to be discontinued during the planning period and therefore do not constitute an impediment to planned residential development on the site during the planning period.
7. As required by Government Code Section 65585(e), the San Mateo County Board of Supervisors has considered the findings made by HCD included in the HCD's letter to San Mateo County dated January 20, 2023, consistent with Government Code Section 65585(f), and as described in

Attachment B to the board memorandum accompanying this resolution, incorporated herein, the Housing Element has been amended in response to the findings of the HCD to substantially comply with the requirements of State Housing Element Law as interpreted by State Department of Housing and Community Development.

8. The 2014-2022 San Mateo County Housing Element of the General Plan is hereby repealed in its entirety, and the 2023-2031 Housing Element, attached as Exhibit A to this resolution, incorporated herein, is adopted.
9. This resolution shall become effective upon adoption by the Board of Supervisors.
10. The Director of Planning and Building or designee is hereby directed to file all necessary material with HCD for HCD to find that the Housing Element is in conformance with State Housing Element Law and is further directed and authorized to make all non-substantive changes to the Housing Element to make it internally consistent or to address any non-substantive changes or amendments requested by the HCD to achieve certification.
11. The Director of Planning and Building or designee is hereby directed to distribute copies of the Housing Element in the manner provided in Government Code Sections 65357 and 65589.7

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County of San Mateo - Planning and Building Department

ATTACHMENT G

RESOLUTION NO. _____

BOARD OF SUPERVISORS, COUNTY OF SAN MATEO, STATE OF CALIFORNIA

* * * * *

**RESOLUTION ADOPTING THE NEGATIVE DECLARATION FOR A GENERAL PLAN
AMENDMENT TO REPEAL THE 2014-2022 SAN MATEO COUNTY HOUSING
ELEMENT OF THE GENERAL PLAN AND ADOPT THE 2023-2031 SAN MATEO
COUNTY HOUSING ELEMENT OF THE GENERAL PLAN**

RESOLVED, by the Board of Supervisors of the County of San Mateo, State of California, that

WHEREAS, in compliance with State Housing Element Law (Government Code Sections 65580 et seq.), San Mateo County has prepared the 2023-2031 Housing Element (the Housing Element), which, upon adoption by the Board of Supervisors, will replace the 2014-2022 Housing Element; and

WHEREAS, as provided in Government Code Section 65350 et. seq., adoption of the Housing Element constitutes a General Plan amendment; and

WHEREAS, said adoption of the Housing Element is considered a “Project” as that term is defined under the California Environmental Quality Act (“CEQA”); and

WHEREAS, the County prepared an Initial Study and Negative Declaration for this project, consistent with the requirements of CEQA, and determined that as a programmatic document that does not directly impact the environment absent subsequent implementation actions, adoption of the Housing Element has no potential environmental impacts, and no mitigation measures are required; and

WHEREAS, the Initial Study and Negative Declaration were posted on May 3, 2023, and noticed and circulated for comment for 30 days in accordance with the requirements of CEQA; and

WHEREAS, the County Planning Commission conducted a duly noticed public hearing on April 10, 2024, and received public comment, and has recommended that this Board of Supervisors adopt the Negative Declaration as complete, correct and adequate, and prepared in accordance with CEQA and applicable State and County guidelines; and

WHEREAS, this Board of Supervisors held a duly noticed public hearing on April 23, 2024, to consider the Negative Declaration and the proposed General Plan amendment and to take public testimony; and

WHEREAS, this Board of Supervisors, in its independent judgement and analysis, has considered the Initial Study and Negative Declaration, along with comments received, and finds on the basis of the whole record before it that there is no substantial evidence that the Project will have a significant effect on the environment; and

NOW, THEREFORE, IT IS HEREBY DETERMINED AND ORDERED that the Board of Supervisors adopts the attached Negative Declaration as complete, correct and adequate, and prepared in accordance with the California Environmental Quality Act and applicable State and County guidelines.

BE IT FURTHER RESOLVED that the resolution shall become effective immediately upon its passage and adoption.

* * * * *



County of San Mateo - Planning and Building Department

ATTACHMENT H

INTRODUCTION

The 2023-2032 (Cycle 6) Housing Element of the San Mateo County General Plan constitutes an assessment of the County's current and future housing needs, and presents a housing plan with goals, policies, and specific programs to meet those needs over the next 8 years and beyond. The Housing Element is the document the County uses to:

- Analyze current and future housing needs for all areas, communities, and residents of the unincorporated County, for all types of housing
- Identify existing and potential housing constraints, resources, and opportunities
- Establish the County's housing objectives, and a housing plan including policies and programs to achieve them
- Identify sufficient developable housing sites to meet the County's estimated share of projected regional housing need over the next 8 years

Like other jurisdictions in San Mateo County, the larger region, and increasingly all parts of the state, the County continues to face severe housing pressures, rising housing costs, and housing shortages of all kinds, particularly for lower-income groups, special needs populations, and other residents who face distinct housing burdens. In addition, housing shortages in urbanized areas throughout the region have contributed to sprawling and inefficient development patterns, loss of open space and damage to natural resources, and increasingly long worker commutes with concomitant increased automobile traffic, greenhouse gas emissions, and contributions to climate change.

The overarching aim of the Housing Element is to address these conditions, by promoting the production of housing sufficient to meet the current and projected housing needs of the County's diverse communities, preserving and improving existing affordable housing, encouraging and facilitating development in locations near employment, services and infrastructure, and balancing the challenges of protecting the County's valuable resources and preserving the unique character of the County's communities, while helping provide sufficient, suitable housing for all residents. To that end, the Housing Element establishes the following broad goals, each implemented by more specific policies, and detailed programs with quantified objectives:

- Protect Existing Affordable Housing Stock
- Support New Housing for Extremely Low to Moderate-Income Households
- Promote Sustainable Communities through Regional Coordination Efforts and Locating Housing Near Employment, Transportation, and Services
- Promote Equal Housing Opportunities
- Promote Equity through Housing Policy and Investments
- Require or Encourage Energy Efficiency, Resource Conservation, and Climate Resiliency Design in New and Existing Housing

The goals, policies and programs of the Housing Element are consistent with and advance the County's adopted Shared Vision, which informs all of the County's work:

Healthy and Safe Community. Our neighborhoods are safe and provide residents with access to quality health care and seamless services.

Prosperous Community. Our economic strategy fosters innovation in all sectors, creates jobs, builds community and educational opportunities for all residents.

Livable Community. Our growth occurs near transit, promotes affordable, livable connected communities.

Environmentally Conscious. Our natural resources are preserved through environmental stewardship, reducing our carbon emissions, and using energy, water and land more efficiently.

Collaborative Community. Our leaders forge partnerships, promote regional solutions, with informed and engaged residents, and approach issues with fiscal accountability and concern for future impacts.

ORGANIZATION OF THE HOUSING ELEMENT

The Housing Element is organized in the following sections:

- Introduction and Executive Summary
- Housing Plan: Goals, Policies and Programs
- Regional Housing Needs Assessment and Adequate Sites Inventory
- Background Appendices:
 - A. Demographics, Housing Conditions and Needs
 - B. Housing Constraints Analysis
 - C. Housing Resources
 - D. Assessment of Prior (2014-2022) Housing Element
 - E. Detailed Sites Inventory and Methodology
 - F. Public Outreach and Participation
 - G. Analysis of Fair Housing

EXECUTIVE SUMMARY

HOUSING PLAN: GOALS, POLICIES AND PROGRAMS

Section 1 of the Housing Element contains the County's Housing Plan, which presents the goals, policies and programs for addressing the County's housing needs, resources and constraints described in the Housing Element. The section is divided by six overarching housing goals:

- Protect Existing Affordable Housing Stock
- Support New Housing for Extremely Low to Moderate-Income Households
- Promote Sustainable Communities through Regional Coordination Efforts and Locating Housing Near Employment, Transportation, and Services
- Promote Equal Housing Opportunities

- Promote Equity through Housing Policy and Investments
- Require or Encourage Energy Efficiency, Resource Conservation, and Climate Resiliency Design in New and Existing Housing

The policies and implementing programs for each goal are presented in detail in Section 1, along with the department, agency, or other entity responsible for implementation, the timeframe for implementation, and specific implementation targets. A summary of key policies includes the following:

Support Conservation and Rehabilitation of Viable Deteriorating Housing by:

- Funding rehabilitation of lower-income, deed-restricted, multifamily rental properties.
- Supporting home repair programs operated by nonprofit agencies.
- Encouraging lead mitigation and energy, water, and resilience/weatherization retrofits in naturally occurring affordable housing stock.
- Incentivizing retrofits for energy, seismic upgrades, weatherization, and water efficiency appliances in existing affordable housing.

Continue to Prohibit Conversions of Rental Housing to Condominium Ownership.

Retain Existing Lower-Income Units, especially those at risk of conversion to market rate housing, by:

- Monitoring managing the County's stock of units with affordability restrictions to ensure units remain affordable.
- Responding to notices of intent to convert assisted affordable housing projects to market-rate housing.
- Studying extending affordability terms on County loans to 99 years.

Continue to Provide Rent Subsidies to Lower-Income Households.

Protect the County's Mobile Home Park Tenants, by:

- Regulating potential closure of parks and mitigating impacts on residents.
- Regulating mobile home rent increases.
- Monitoring park operations and rents to ensure compliance with County regulations, and improving data systems to support reporting required of mobile home park owners/operators.
- Creating a system to automate mobile-home complaint distribution and response.
- Studying policies and funding to preserve mobile home parks as affordable through conversion of ownership or control to resident organizations, nonprofit sponsors, land trusts, or local public entities.

Support Community Resources for Landlords and Tenants, by providing financial support to community-based organizations working to educate landlords and tenants about their rights and responsibilities and providing referrals, mediation and other assistance.

Minimize Displacements Due to Code Enforcement by coordinating all code enforcement actions that have the potential to result in displacement with the Housing Department.

Amend Zoning and General Plan Land Use Designations to Meet Future Housing Needs, including by:

- Implementing additional zoning updates in North Fair Oaks consistent with the Community Plan.
- Assessing implementation of the North Fair Oaks Community Plan and determining amendments to meet community needs and fair housing and equity goals.
- Rezoning one vacant residential parcel included in consecutive Housing Element Sites Inventories, to comply with state law.
- Monitoring housing production against the County's RHNA and adjusting implementation strategies and policies and programs as needed.

Encourage Residential Uses in Commercial and other Non-Residential Zones, by:

- Adding residential uses as ministerially permitted uses in specific commercial areas and zoning districts in North Fair Oaks.
- Exploring other County non-residential areas for rezoning to permit mixed use and residential development.
- Pursuing opportunities for acquisition and/or rehabilitation of sites for affordable housing development, including conversion of commercial and other properties.
- Investigating opportunities for affordable housing development on lands owned by school districts and faith-based organizations.

Encourage Residential Mixed-Use and Transit Oriented Development, by:

- Encouraging and facilitating infill development on vacant or redevelopable lots in already developed areas.
- Including policies and regulations encouraging transit-oriented development in revisions to area plans.

Support Development of Affordable and Special Needs Housing on Available Sites, by

- Refining GIS-based mapping applications to inform developers of housing sites.

- Continuing to expedite permit review and waive planning and building fees for projects providing housing affordable to lower-income households, including seniors, special needs populations, and persons with disabilities.
- Continuing to support infrastructure expansion and identify opportunities for County assistance with infrastructure improvements to support housing.
- Investigating and refining the list of County-owned parcels, including surplus and underutilized properties with potential for affordable housing, and working to make those parcels available for affordable housing development.

Continue to Apply the County's Local Density Bonus Ordinance to grant density bonuses to all eligible projects, and further amend the ordinance applicable in the Coastal Zone to incorporate California Coastal Commission direction.

Continue to Use Available Funds to Increase the Supply of Lower-Income Affordable Housing through support for site acquisition and new construction.

Continue to Use Available Funding to Support Affordable Housing and Supportive Services for Special Needs Populations, investigate new resources for these activities and adopt building design standards and permitting procedures to require and encourage units appropriate for special needs groups.

Increase Accessibility of Housing by encouraging and requiring developers to use Universal Design elements for new construction, and by adopting formal reasonable accommodation procedures.

Incentivize and Support Affordable Housing Opportunities for Large Family Households by funding affordable family housing for large families with lower incomes and encouraging housing developments assisted by the Housing Department to include larger units.

Support the Development of Housing for Farm Laborers, and Monitor the Quality and Safety of Farm Labor Housing Sites, by:

- Advocating for federal/state legislation and funding for programs to provide housing for farmworkers.
- Continuing to use local funding to support farm worker housing programs, and identifying additional local funding.
- Collaborating with housing developers to identify sites for affordable housing for farmworkers, and with local partners to assess opportunities to expand and/or renovate existing farm labor housing sites.
- Monitoring and inspecting farm labor housing sites to assess the health and safety of employees.
- Engaging with community organizations, regional groups, agricultural stakeholders, and regulatory agencies to identify barriers to new affordable farmworker housing.
- Completing a farmworker laborer demographics study to understand the composition and characteristics of the County's farmworker population.

Provide Affordable Housing Opportunities and Supportive Services to Homeless Individuals and Families, by:

- Continuing to use federal, state and local funds to support emergency, interim, and permanent housing.
- Continuing to require that at least 5% of units in affordable housing projects funded with local funds are set aside for homeless households, and prioritizing projects that set aside 20% or more of units for the homeless.
- Securing local, state and federal funding to acquire and operate interim and permanent supportive housing.
- Continuing to support community-based organizations that provide rapid rehousing, housing navigation services and other homelessness prevention efforts.
- Continuing to support the County’s Center on Homelessness by implementing housing strategies promulgated through the Ending Homelessness in San Mateo County report.

Assist and Support the Development of Housing for Extremely Low-Income Households of All Types, by promoting inclusion of rental and ownership housing priced for extremely low-income households in all possible housing developments and other new housing created, assisted, or incentivized by County policies, and providing targeted financial and other assistance for creation of housing for extremely low-income households as part of funding programs provided by the County.

Continue County Participation in and Facilitation of Inter-Jurisdictional and Cross-Sectoral Collaborations for housing planning and development.

Strengthen and Clarify County Inclusionary Housing Requirements, by considering adding inclusionary requirements for larger-scale single-family residential developments, modifying administrative guidelines for the Inclusionary Ordinance to provide clarity and flexibility, and exploring revisions to in-lieu fee, off-site, and land dedication options to ensure these are consistent with the intent to promote sufficient affordable housing.

Continue to Impose and Collect the County’s Existing Affordable Housing Impact Fee while undertaking a new nexus study determining current need and appropriate fee levels.

Encourage and Facilitate Accessory Dwelling Unit Development by:

- Implementing the County’s ADU ordinance.
- Implementing the County’s ADU amnesty program.
- Implementing an ADU permit streamlining program, which expedites permit processing for ADUs.
- Continuing to manage the “ADU One Stop Shop” pilot program.
- Administering the County-coordinated Second Unit Center, which offers technical assistance, guidance, best practices, and designs for residents interested in ADUs.
- Participating in HEART’s multijurisdictional effort to create pre-approved ADU design templates.

Continue to Provide Support for Affordable Homeownership Opportunities for lower-income residents, including providing technical assistance to HEART for its first-time homebuyer program.

Continue to Support Programs That Facilitate Co-Living as a way to use existing housing stock to fit diverse housing needs and help both existing homeowners and residents seeking affordable housing.

Minimize Permit Processing Fees, by continuing fee reductions and waivers for affordable housing, and reviewing and potentially revising fee policy and procedures to clarify and streamline the process.

Update Parking Standards to reflect the parking needs of different types of affordable housing and transit-oriented-development.

Promote Community Participation in Housing Plans, by providing education materials and outreach regarding housing needs, and supporting efforts by nonprofits and jurisdictions to promote diverse community participation in the development, implementation, and monitoring of housing plans.

Encourage Transit Oriented Development, Compact Housing, and Mixed-Use Development in appropriate area throughout the county, such as transit corridors and commercial areas.

Enforce Fair Housing Laws, by continuing to fund fair housing enforcement, education, and technical assistance.

Encourage the Development of Multi-Family Affordable Housing in High Opportunity Areas, as defined by the Department of Housing and California Department of Housing and Community Development.

Support Anti-Displacement and Preservation Efforts in Lower- Resourced Communities of Color by continuing to provide funding for preservation of existing affordable housing and creation of new affordable housing developments in Low Resource and High Segregation & Poverty Areas.

Promote the Hiring of Economically-Disadvantaged Workers and Certified Minority- and Women-Owned Business in the development or rehabilitation of affordable housing.

Promote Energy Conservation and Transition From Natural Gas to All-Electric Appliances In Existing Housing, by encouraging property owners and renters to access energy assessments, programs, and rebates, and promote solar roof systems and other passive solar devices in coordination with batteries in multifamily affordable housing.

SITES INVENTORY AND REGIONAL HOUSING NEEDS ASSESSMENT

A key component of the Housing Element is the identification of sufficient development capacity to meet the County's housing need over the 8 years of the Housing Element planning period. State law requires that every jurisdiction's Housing Element demonstrate that the jurisdiction has sufficient appropriately zoned developable or redevelopable land to accommodate the jurisdiction's share of regional housing need, as determined by the California Department of Housing and Community Development (HCD) and the local Council of Governments (COG). In the Bay Area, the COG is the Association of Bay Area Governments (ABAG), which estimates housing need for the region, and apportions a share of projected need to every jurisdiction; a jurisdiction's individual share of housing

need is its Regional Housing Needs Allocation, or RHNA. The RHNA includes both total projected residential units needed to meet demand over the next 8 years, and a breakdown of housing units needed by income level.

The County’s RHNA shown below. The County will need 2,833 housing units in total, with 811 units for very low-income households, 468 for low-income households, 433 for moderate-income households, and the remainder for above moderate-income households.

San Mateo County RHNA, 2022 - 2031

Income Category	% of County Area Median Income (AMI)	Units	% of Units
Very Low	0-50%	811	29%
Low	51-80%	468	17%
Moderate	81-120%	433	15%
Above Moderate	120% +	1,121	40%
Total		2,833	100%

Appendix E includes the full Adequate Sites Inventory and methodology, including:

- A detailed inventory and description of developable and redevelopable sites, divided into vacant single-family zoned sites, vacant multifamily zoned sites, and non-vacant multifamily zoned sites;
- Projects already planned, approved, entitled, or otherwise underway;
- Projected future development of accessory dwelling units (ADUs), and;
- Projected development pursuant to the provisions of the recently adopted State law SB 9, which facilitates small-scale multifamily development on single-family zoned parcels;
- A map of all sites identified to meet the County’s RHNA.

While the combination of these categories provides sufficient capacity for the County to meet its RHNA in total, as shown below, there is a deficit in very low-income category, and limited surplus capacity in the low-, and moderate-income categories of housing need. To account for this deficit, the Housing Element incorporates a Rezoning Program, Policy HE 11.3 of the Housing Plan. The Rezoning Program identifies 87 parcels constituting approximately 30 acres, located in the unincorporated Colma, Broadmoor, and Harbor Industrial areas, currently zoned either for commercial and industrial development, or for very low intensity residential development, that will be rezoned to provide additional capacity for residential development to meet the County’s RHNA. The County’s capacity to meet the RHNA, without rezoning and with rezoning, is shown in the tables below.

RHNA vs Development Capacity without Rezoning

Income Category	RHNA	Vacant Multifamily	Non-Vacant Redevelopable	Vacant SFR	Pipeline Projects	ADUs	SB 9 Units	Total Units	Surplus/ (Deficit)
Very Low	811	18	235	-	254	107	0	615	(197)
Low	468	17	235	-	196	107	0	556	88
Moderate	433	44	199	-	44	107	88	482	49

Above Moderate	1,121	183	630	385	147	36	88	1,469	348
Total	2,833	262	1,299	385	641	355	176	3,118	285

RHNA vs Development Capacity w/ Rezoning

Income Category	RHNA	Total Units	Original Surplus/ Deficit	Units from Rezoning	New Total Capacity	Surplus/ (Deficit) w/ Rezoning
Very Low	811	615	(197)	522	1,137	326
Low	468	556	88	504	1,060	592
Moderate	433	482	49	504	986	553
Above Moderate	1,121	1,469	348	404	1,873	752
Total	2,833	3,118	285	1,934	5,052	2,219

DEMOGRAPHICS, HOUSING CONDITIONS AND NEEDS

To help determine the amounts and types of housing needed in the unincorporated County, the Housing Element assesses demographics, housing supply and production trends, housing stock characteristics, housing costs, affordability, tenure, and other housing conditions, special needs populations, and various other factors that impact housing needs. This assessment is described in Appendix A. Key factors include:

Population. The unincorporated County’s population has grown moderately over the last decade, largely keeping pace with the growth of the County overall. At 66,000 residents as of 2020, unincorporated population remains approximately 8% of total County population. However, while population growth in the unincorporated County did not change dramatically, it still outpaced housing production.

Age. The County’s population is aging, with the greatest increase in the age groups over 55 years. However, there was also a significant increase in the 18 to 34-year-old age group, likely driven by an influx of younger workers. The aging of the County’s population may indicate changes in the types of housing required for older residents.

Employment Growth. Job growth in the unincorporated County has been low compared to incorporated areas, but because employment growth creates regional housing pressures, overall job growth has increased demand and contributed to housing shortages in both incorporated and unincorporated areas.

Housing Tenure and Type. Most of the unincorporated County’s housing, approximately 75%, is owner-occupied. However, younger residents, as well as black and Hispanic residents, are significantly more likely to be renters than other residents. In addition, most of the unincorporated County’s housing is detached, single-family ownership housing, while the small amount of multifamily housing stock is primarily rental housing. There is a need for a greater variety of housing types, particularly more multifamily and rental housing, to serve the diverse needs of the County’s residents.

Housing Affordability and Overpayment. Housing costs continue to be unaffordable to most County residents, and many households in the County, including a disproportionate number of renter households, as well as younger households, overpay for housing.

Overcrowding. Overcrowding is a problem in most unincorporated areas, and is particularly significant for renter households.

Farm Labor Housing. The unincorporated County's farm labor population has declined over the past decade, but there remains a shortage of farm labor housing, and farm laborers face significant housing affordability issues

Housing for Disabled Persons. While the unincorporated County's disabled population did not significantly increase over the past decade, persons with disabilities face unique affordability challenges and may require a variety of specific housing types, and housing affordable and accessible for persons with disabilities continues to be a distinct need.

Housing for the Homeless. Like almost every jurisdiction in the County, the unincorporated County's homeless population has increased, indicating a continued need for various types of housing for the homeless, as well as underscoring the significant, consistent need for affordable housing of all kinds.

CONSTRAINTS TO HOUSING PRODUCTION

Constraints to the development of housing include non-governmental constraints, including the cost of construction, environmental factors, and natural hazards, and governmental constraints over which the County may have control, including development regulations, approval processes, time, costs, and other factors.

Significant non-governmental constraints include the cost of housing production, including land and construction costs, as well as the availability of financing, particularly for affordable housing. These costs have all risen over the past decade, and in recent years have been particularly high, posing significant challenges for production of multifamily housing in particular.

The unincorporated County also has a diverse range of conditions, with varied geography, terrain, and infrastructure, including protected natural resource, open space and recreational areas, active and protected farmland, and areas served only by well water and septic systems. In addition, a variety of natural hazards, including seismic risk, flood, wildfire, tsunami, and other risks may impact development feasibility. However, while many of these factors may ultimately pose constraints to additional housing development, at present there remains sufficient unconstrained, developable land to meet the County's housing needs over the next 8 years.

The County made significant strides in reducing constraints to housing production during Housing Element Cycle 5 (2014-2022), including:

- Updated Accessory Dwelling Unit (ADU) regulations and permitting processes, reducing regulatory barriers to ADUs, expediting ADU processing, and streamlining and facilitating ADU production in all areas of the County.

- Updated Density Bonus Regulations to allow additional density and other development exceptions for projects providing affordable housing, consistent with state law.
- Full implementation of all newly-adopted state laws regarding housing production and streamlining, including the Housing Accountability Act, SB-35, and others
- Adoption and application of objective design standards for various kinds of development in most areas of the County, reducing the time and cost of review and approval.
- A blanket prohibition on the use of ADUs as short-term rentals, a prohibition on all short-term rentals outside the Coastal Zone, and strict regulations on short-term rentals in the County's Coastal Zone, helping preserve housing units for long-term occupancy.
- Streamlined farm labor housing permitting, and a pilot program funding new farm labor housing units.
- Permitting emergency shelters by-right in the Planned Colma District, and allowing shelters as a conditionally permitted use in multiple other areas.
- Adoption of new high-density residential zoning of up to 120 units/acre in proximity to transit in the North Fair Oaks community.
- A new entirely electronic Application and Permit Review Process, streamlining submittal, review, comment, and revisions of project applications, and issuance of permits.
- The creation and implementation of the Affordable Housing Fund, an annual Notice of Funding Opportunity providing funds towards the construction and preservation of affordable housing units in the County.

However, there remain potential regulatory and other governmental constraints that may impact housing production, and the County will continue to take steps to encourage and facilitate housing production, streamline development processing, apply objective standards, and address other constraints within its control over the next eight years, as described in the policies and programs included in the Housing Plan in Section 1.

HOUSING RESOURCES

The County Department of Housing (DOH), made up of the Housing and Community Development Division and the Housing Authority of the County of San Mateo, is a primary provider and coordinator of housing resources. The Department collaborates with diverse stakeholders to facilitate the development and preservation of affordable housing through the provision of local, state, and federal funding to unincorporated areas and incorporated jurisdictions, along with the sharing of best practices and innovative policies. The Department also supports public service agencies, microenterprises, homeless and transitional shelters, core services, and fair housing organizations through grant funding and technical assistance. The Housing Authority also directly provides rental subsidies to low-income households, manages County-owned housing projects, and provides funding and support for preservation and development of affordable housing.

Federal Resources available in the County include various federal resources such as the Community Development Block Grant Program (CDBG), HOME Investment Partnership (HOME) Program, Emergency Solutions Grants (ESG) Program, and the U.S. Department of Housing and Urban Development's (HUD) Section 8 Rental Voucher Programs. DOH also helps manage a significant amount of emergency pandemic-related housing resources made available through the Coronavirus Aid, Relief, and Economic Security (CARES) Act and the Federal American Rescue Plan (ARP).

Local Resources include:

- The County's Affordable Housing Fund (AHF), initially funded by funds held by former redevelopment agencies and now supported on an ongoing basis by dedicated Measure K funds, derived from a countywide half-cent sales tax.
- The County's Inclusionary Housing Ordinance which requires all new multi-family developments creating five or more units to set aside a minimum of 20% of the total units for extremely low to moderate income households. The County also has an affordable housing fee applicable to most development not subject to the inclusionary requirement; the fees are collected in the AHF, and disbursed by the Housing Department.
- DOH coordinates the dedication of County-owned land for development of affordable housing, and the Housing Authority of the County of San Mateo manages two County-operated affordable housing projects.
- The countywide housing trust fund, the Housing Endowment and Regional Trust (HEART), supports construction, rehabilitation, and purchase of affordable housing for low and middle-income workers and residents on fixed incomes.
- The County Human Services Agency's (HSA) Center on Homelessness is responsible for coordination of homeless services within County agencies, and also works with non-profits, other local governments, business and other parts of the community. HSA and DOH work in partnership to support housing and social services that address the needs of homeless and at-risk individuals and families.

State Resources create and preserve affordable housing for low-income households, and for a variety of special needs populations, including farm labor housing, various supportive and transitional housing, housing for persons with disabilities, housing for the homeless or those at risk of homelessness, and various other populations. Those that are managed directly by DOH include the Local Housing Trust Fund Program (LHTF); Housing for a Healthy California Program (HHC); the Mental Health Services Act (MHSA) Housing Program No Place Like Home (NPLH) Permanent Local Housing Allocation (PHLA); and the Homekey Program. Other State Resources that are available directly to developers and non-profit organizations include the Multifamily Housing Program (MHP); Infill Infrastructure Grant Program (IIG); Veterans Housing and Homelessness Prevention Program (VHHP); Joe Serna, Jr. Farmworker Housing Grant (FWHG) Program; Affordable Housing and Sustainable Communities Program (AHSC); State Low Income Housing Tax Credits (State LIHTC); and Tax-Exempt Bond Financing.

Regional Resources. The County also participates in a variety of regional collaborations and partnerships focused on addressing regional housing issues and collectively planning for and funding housing needs, including intergovernmental collaborations, and collaborations across the public, private, and nonprofit sectors.

ASSESSMENT OF PRIOR HOUSING ELEMENT

Appendix D includes an assessment of the status, progress, and accomplishments of each of the policies and programs in the 2014-2022 Housing Element. Accomplishments during Housing Element Cycle 5 include:

- Significant strides to increase the production of accessory dwelling units.
- Expansion of health and safety inspections in multifamily residential structures.
- Development of new revenue sources for affordable housing.
- Streamlining of residential development approval processes.
- Contribution of significant funding and other resources for the production and preservation of affordable housing, direct assistance for low-income renters and homebuyers, and for fair housing enforcement assistance.
- Adoption new regulations protecting mobile home parks from conversion, and provided financing and other assistance for mobile home rehabilitation and replacement.
- Assistance for energy efficiency audits and upgrades in residential structures, and new requirements for solar installation and all-electric construction in residential and commercial buildings.
- Adoption of a number of new high-density residential zoning districts, allowing up to 120 units/acre in proximity to transit.

PUBLIC OUTREACH AND PARTICIPATION

Robust public engagement and participation is essential to the Housing Element update process. Public participation and input help to identify the housing issues faced by community and the policies and programs best suited to address those issues, as well as helping frame the County's overall approach to housing issues.

To engage community members in the Housing Element update process and solicit input on housing issues, needs, and strategies, the County participated in, co-facilitated, and/or held a number of forums, workshops, and hearings, as well as distributing a housing survey, and receiving comment by other means. Outreach, input, and participation included:

With the Let's Talk Housing Countywide collaboration:

- Community Conversation: A Housing Element Update Countywide Forum and Workshop
- Four Housing Element Stakeholder Listening Sessions, with stakeholders in the following areas:
 - Fair Housing;
 - Housing Advocates;
 - Builders and Developers;

- Service Providers
- Creating an Affordable Future Webinar Series, a series of presentations and discussion forums on the broad implications of housing policy:
 - Why Affordability Matters
 - Housing and Racial Equity;
 - Housing in a Climate of Change;
 - Putting it All Together for a Better Future
- All About RHNA webinar, a web-based training to help educate community members on the regional housing needs allocation process, the sites inventory requirement, and related issues.
- Informational Videos: 21 Elements/Let's Talk Housing helped produce two informational videos, to ensure that information on the Housing Element update was available and accessible in a short, comprehensible format.

Equity Advisory Group. The County, in collaboration with other jurisdictions, relied on guidance and input from an Equity Advisory Group (EAG), composed of various stakeholders, organizations and experts working on equity issues.

Unincorporated County-specific hearings and forums included:

- ✓ North Fair Oaks Community Council, July 15, 2021, September 15, 2021, and December 16, 2021
- ✓ Sustainable Pescadero, March 2, 2022 and April 6, 2022
- ✓ Midcoast Community Council, May 25, 2022
- ✓ San Mateo County Planning Commission, March 23, 2022
- ✓ San Mateo County Board of Supervisors, May 17, 2022
- ✓ San Mateo County Planning Commission, November , 2022
- ✓ San Mateo County Board of Supervisors, December 6, 2022
- ✓ San Mateo County Board of Supervisors, December 13, 2022

Websites. The County maintained a Housing Element update [website](#), with information on the update process, links to the housing survey, information on outreach efforts and public input, as well as a separate website through the Let's Talk Housing collaborative, with both San Mateo County-specific [information](#), and information on interjurisdictional Housing Element update efforts.

The County distributed a Housing Issues and Needs Survey, focused on unincorporated County housing issues, needs, and other input.

Consultants engaged through the 21 Elements collaborative to complete a fair housing assessment for every jurisdiction also conducted an Affirmatively Furthering Fair Housing resident survey focused on fair housing issues.

Summary and Key Themes of Input Received

Key themes in input from community members, stakeholders, workshop and forum participants, survey respondents, and others included:

- Housing costs are an almost universal concern.
- More housing supply is needed, although there is diversity of opinion on how and where to provide it.

- There is a need for greater diversity of housing stock, with more multifamily housing, more housing for special needs populations, supportive housing, and housing appropriate for different household types.
- Housing pressures are making it difficult or impossible for workers and families to stay in their communities.
- Housing costs, as well as pressures from new development, are driving gentrification and displacement.
- New development and increased density, including development driven by state mandates, may negatively impact traffic, parking, infrastructure, open space, and services, and there is an urgent need to comprehensively plan to address these impacts.
- The development process and the permitting process are too slow, too costly, too opaque, and too inefficient.
- Transportation, climate change, and access to jobs and educational opportunities are all issues that relate to housing, and should be addressed together.
- The County’s Housing Element, as well as other County policies, should recognize housing inequities and the disparate impacts of housing issues across different communities, and explicitly consider and address equity and fair housing issues.
- The County should provide more resources for farm labor housing.
- There is a need for better information resources on housing issues and policies and on the availability of affordable housing.

The County also received letters from several advocacy organizations in the early stages of the Housing Element update, providing generalized policy guidance

The 2023-2031 Draft Housing Element was released for public review on November 16, 2022. The comment period closed on December (18), 2022.

After release of the Public Draft, the County received a number of letters and emails commenting on the draft. In addition, the County engaged in discussion with various stakeholders and groups providing informal comment.

The substance of comments received both prior to and after public release of the Draft Housing Element, and the response and outcomes are summarized in Appendix F. The comments resulted in various amendments to the policies and programs in the Housing Plan to make them more robust and more precise, changes to the Sites Inventory, and various minor edits to clarify minor issues identified in the comments.

FAIR HOUSING ASSESSMENT

Fair housing is the condition in which all residents, regardless of race, ethnicity, gender, income, class, sexual orientation, ability status, or other status have equal access to housing.

Affirmatively furthering fair housing (AFFH) “means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. The duty to affirmatively further fair housing extends to all of a public agency’s activities and programs relating to housing and community development. (Gov. Code, § 8899.50, subd. (a)(1).)”

By law, all public agencies in the State must affirmatively further fair housing, and every jurisdiction’s Housing Element must incorporate an analysis of fair housing conditions, and policies and programs to address housing disparities and inequities.

The County’s AFFH assessment, findings, and policy recommendations are included in Appendix G. The analysis includes background on the history of segregation in the Bay Area and a timeline of major fair housing milestones; the remaining sections assess fair housing patterns and conditions in the unincorporated areas, and provide policy and programmatic guidance to address findings.

The analysis is divided in four sections. Section I, Fair Housing Enforcement and Outreach Capacity, reviews lawsuits/enforcement actions/complaints against the County; compliance with state fair housing laws and regulations; and jurisdictional capacity to conduct fair housing outreach and education. Section II, Integration and Segregation, identifies areas of concentrated segregation, degrees of segregation, and the groups that experience the highest levels of segregation. Section III, Access to Opportunity, examines differences in access to education, transportation, economic development, and healthy environments. Section IV. Disparate Housing Needs identifies which groups have disproportionate housing needs including displacement risk.

The findings of the AFFH analysis include:

- No fair housing complaints were filed in unincorporated San Mateo County from 2017 to 2021.
- Racial and ethnic minority populations are disproportionately impacted by poverty, low household incomes, overcrowding, and homelessness compared to the non-Hispanic White population in unincorporated San Mateo County. Additionally, racial and ethnic minorities are more likely to live in low resources areas and be denied for a home mortgage loan.
- North Fair Oaks is disproportionately impacted by high poverty, low education opportunity, low economic opportunity, high social vulnerability scores, concentrations of cost burdened households, overcrowding, and low resource scores.
- Many areas in the county have low environmental scores—which account for PM2.5, diesel PM, pesticides, toxic release, traffic, cleanup sites, groundwater threats, hazardous waste, impaired water bodies, and solid waste sites.
- Unincorporated San Mateo County has the same proportion of residents with a disability (8%) as the entire county (Figure III-17). Residents living with a disability in unincorporated areas are

concentrated throughout the county. Additionally, the aging population is putting a strain on paratransit access countywide.

- Racial and ethnic minority students in unincorporated San Mateo County experience lower educational outcomes compared to other students.
- Over half of all renter households in unincorporated San Mateo County are cost burdened—spending more than 30% of their gross income on housing costs—and nearly one in three are extremely cost burdened—spending more than 50% of their gross income on housing costs (Figure IV-9). There are disparities in housing cost burden in unincorporated San Mateo County by race and ethnicity and family size.

Based on these findings the analysis includes a set of recommendations to address the identified disparities, shown in Appendix G-5. The recommended actions have been incorporated in the Policies and Programs in the Housing Plan in Section X, including policies to:

- Identify barriers for tenant-based voucher holders seeking housing in areas with greater access to resources and opportunities.
- Refine the ADU Amnesty and Loan Program to better provide ADU housing for low- or very low-income households.
- Implement additional higher density transit-oriented zoning in North Fair Oaks.
- Assess the status of implementation of the North Fair Oaks Community Plan, including a specific fair housing assessment to determine unmet needs of North Fair Oaks residents.
- Inventory publicly-owned properties and incorporate fair housing assessment in the prioritization of use of these properties for below-market rate housing.
- Prioritize housing funding to provide affordable housing and supportive services for elderly and/or disabled persons, and adopt universal design standards and reasonable accommodation procedures to ensure the provision of housing appropriate for these populations.
- Work with the Housing Endowment and Regional Trust to target mortgage assistance to communities experiencing high rates of mortgage denials.
- Encourage transit-oriented, high-density development, and continue to participate in local and regional efforts to increase transit availability and accessibility, including for special needs populations.
- Continue to support fair housing enforcement, education, and technical assistance.
- Affirmatively market County-supported affordable housing to underrepresented communities.

- Prioritize affordable multifamily housing development in high opportunity areas, while continuing to invest in the creation and preservation of affordable housing in low resource areas.
- Promote hiring of economically-disadvantaged workers and certified minority- and women-owned business in housing development and rehabilitation.
- The rezonings in the Rezoning Program described in Policy HE 11.3 provide the opportunity to significantly diversify the production of affordable housing across county areas, directly addressing a variety of fair housing issues.

PLANNING AREA FOR THE HOUSING ELEMENT

The County's Housing Element addresses housing needs, issues, goals, and policies for the unincorporated portions of San Mateo only-- those areas not included within the legal boundaries of one of the 20 incorporated cities within the County. Each of the incorporated cities also has its own distinct Housing Element, which addresses its own housing plan.

The unincorporated county consists of approximately 309 square miles, with wide variety in the size, location, physical, economic and social characteristics of the various unincorporated areas. Unlike most contiguous cities, the unincorporated County includes disparate geographically separated areas that vary distinctly in character, including extensive undeveloped rural areas, significant active and protected agriculture, low-intensity rural and/or coastal communities such as King's Mountain, La Honda, and Pescadero, more urbanized coastal communities such as El Granada, Montara and Moss Beach, low-density bayside communities including Ladera and Los Trancos Woods, suburban scale bayside communities such as Emerald Lake Hills and West Menlo Park, and denser urban communities, largely consisting of unincorporated areas wholly surrounded by incorporated cities, such as North Fair Oaks, unincorporated Colma, Broadmoor and Devonshire. Approximately half of San Mateo County's total land area, but only roughly 8% of the county's population, is located in the unincorporated County.

While the assessment of housing needs and the programs and policies in the Housing Element focus primarily on the unincorporated County, the Housing Element also recognizes that housing is a countywide and region-wide concern, and that housing issues and needs are shared across jurisdictional boundaries, and may require solutions similarly shared across jurisdictions. Where appropriate, the analysis and the policies and programs included in the Housing Element reflect this fact.

STATE HOUSING ELEMENT REQUIREMENTS

All cities and counties in California must adopt and periodically update a Housing Element, as a mandatory element of the jurisdictions' General Plan. Detailed requirements for preparing, revising, and adopting Housing Elements are contained in the California Government Code, and are summarized by the California Department of Housing and Community Development here: <https://www.hcd.ca.gov/housing-elements-hcd>.

The County's 2022-20031 Housing Element incorporates all of the substantive content required by State law, and the adoption and drafting process adheres to the procedural requirements of the law.

In order to take effect, the updated Housing Element must be certified by the California Department of Housing and Community Development as compliant with the requirements of state law, and must be adopted by the County Board of Supervisors. On certification and adoption, the updated Housing Element will replace the existing 2014-2022 Housing Element.

RELATIONSHIP OF THE HOUSING ELEMENT TO THE GENERAL PLAN AND OTHER LAND USE PLANS

The San Mateo County Housing Element is a mandatory element of the County's General Plan, required by state law. By law, it must also be consistent with the other elements of the General Plan, as well as other relevant adopted land use plans.

Consistency with the General Plan and Specific Area Plans

As an element of the General Plan, the Housing Element must be internally consistent with the other elements of the General Plan, including Vegetative, Water, Fish and Wildlife Resources; Soil Resources; Mineral Resources; Visual Quality; Historical and Archaeological Resources; Park and Recreation Resources; General Land Use; Urban Land Use; Rural Land Use; Water Supply; Wastewater; Transportation; Solid Waste; Housing; Natural and Man-made Hazards; Air Resources; and the Energy and Climate Change element. The updated Housing Element has been reviewed for consistency and is consistent with all other elements of the General Plan.

As part of the General Plan, the County has also adopted the following area plans for specific unincorporated communities: North Fair Oaks Community Plan, Emerald Lake Hills Community Plan, Montara-Moss Beach-El Granada Community Plan, San Bruno Mountain General Plan Amendment, Skyline Area General Plan Amendment and the Colma BART Station Area Plan. Each of these area plans contains land use, development, and housing-related policies that apply to the specific area. The Housing Element has been reviewed for consistency and is consistent with each of these area plans.

Consistency With Airport Land Use Compatibility Criteria

The unincorporated County includes three airports with adopted Airport Land Use Compatibility Plans: San Francisco International Airport, Half Moon Bay Airport, and San Carlos Airport. The Housing Element must be consistent with the Land Use plans adopted for these airports and their surrounding environs, and must be reviewed by the City/County Association of Governments (C/CAG) to confirm compatibility. The draft 2023-2031 Housing Element has been submitted to C/CAG for review.

Consistency with Local Coastal Program

San Mateo County has a coastal zone and an adopted Local Coastal Program (LCP) establishing land use policies for the coastal zone, with implementing zoning and other regulations that constitute the Implementation Plan for the LCP. The Housing Element does not alter any policies or regulations relating to the County's coastal zone, and has been reviewed and determined to be consistent with the LCP and all implementing regulations.

RESOLUTION NO. _____

BOARD OF SUPERVISORS, COUNTY OF SAN MATEO, STATE OF CALIFORNIA

* * * * *

RESOLUTION ADOPTING A GENERAL PLAN AMENDMENT TO REPEAL THE 2014-2022 SAN MATEO COUNTY HOUSING ELEMENT OF THE GENERAL PLAN AND ADOPT THE 2023-2031 SAN MATEO COUNTY HOUSING ELEMENT OF THE GENERAL PLAN, IN COMPLIANCE WITH STATE LAW, AND DIRECTING SUBMITTAL OF THE ADOPTED HOUSING ELEMENT TO THE CALIFORNIA DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT

RESOLVED, by the Board of Supervisors of the County of San Mateo, State of California, that

WHEREAS, in Government Code Section 65589.5, the California Legislature declared that “California has a housing supply and affordability crisis of historic proportions. The consequences of failing to effectively and aggressively confront this crisis are hurting millions of Californians, robbing future generations of the chance to call California home, stifling economic opportunities for workers and businesses, worsening poverty and homelessness, and undermining the state’s environmental and climate objectives;” and

WHEREAS, State Housing Element Law (Government Code Sections 65580 et seq.) requires that the San Mateo County Board of Supervisors adopt a Housing Element for the 2023-2031 period to accommodate San Mateo County’s regional housing need allocation (RHNA) of 2,833 housing units, comprised of 811 very-low income units, 468 low-income units, 433 moderate-income units, and 1,121 above moderate-income units; and

WHEREAS, to comply with State Housing Element Law, San Mateo County has prepared the 2023-2031 Housing Element (the Housing Element) in compliance with State Housing Element Law and has identified sites that can accommodate housing units meeting the San Mateo County's RHNA; and

WHEREAS, as provided in Government Code Section 65350 et. seq., adoption of the Housing Element constitutes a General Plan amendment; and

WHEREAS, as provided in Government Code Sections 65352 – 65352.5, San Mateo County mailed public notice to all California Native American tribes provided by the Native American Heritage Commission and to other entities listed in the statute; and

WHEREAS, no California Native American tribe requested consultation; and

WHEREAS, in accordance with Government Code Section 65585(b), on November 17, 2022, San Mateo County posted the draft Housing Element and requested public comment for a 30-day review period, and on January 20, 2023, after responding to public comments, the County submitted the draft Housing Element to the State Department of Housing and Community Development (HCD) for its review; and

WHEREAS, on April 20, 2023, San Mateo County received a letter from HCD providing its findings regarding the draft Housing Element; and

WHEREAS, on March 26, 2024, San Mateo County published a revised draft Housing Element responding to HCD's findings and requested public comment on the draft; and

WHEREAS, the draft Housing Element has been reviewed for consistency with the other elements of the General Plan, including Vegetative, Water, Fish and Wildlife Resources; Soil Resources; Mineral Resources; Visual Quality; Historical and Archaeological Resources; Park and Recreation Resources; General Land Use; Urban Land Use; Rural Land Use; Water Supply; Wastewater; Transportation; Solid Waste; Housing; Natural and Man-made Hazards; Air Resources; and the Energy and Climate Change element, and is consistent with all other elements of the General Plan; and

WHEREAS, the draft Housing Element has been reviewed for consistency with the following area plans for specific unincorporated communities North Fair Oaks Community Plan, Emerald Lake Hills Community Plan, Montara-Moss Beach-EI Granada Community Plan, San Bruno Mountain General Plan Amendment, Skyline Area General Plan Amendment, and the Colma BART Station Area Plan, and is consistent with each of these area plans.

WHEREAS, on April 10, 2024, the Planning Commission held a duly and properly noticed public hearing and recommended that the Board of Supervisors adopt the Housing Element; and

WHEREAS, on April 24, 2024, the Board of Supervisors conducted a duly and properly noticed public hearing to take public testimony and consider this resolution regarding the proposed Housing Element, reviewed the Housing Element and all pertinent maps, documents and exhibits, including HCD's findings, San Mateo County's response to HCD's findings, the staff report, and all attachments, and oral and written public comments; and

NOW, THEREFORE, IT IS HEREBY DETERMINED AND ORDERED that the Board of Supervisors finds that, based on substantial evidence in the record:

1. The foregoing recitals are true and correct and are incorporated by reference into this action.
2. The adoption of the proposed General Plan amendment will not cause the General Plan to become internally inconsistent, in violation of Government Code Section 35300.5, for the reasons set forth in this resolution.
3. The adoption of the proposed General Plan amendment is in the public interest, as required by Government Code Section 65358(a) because the Housing Element includes a number of policies and programs that are in the public interest and will add to the housing stock and help alleviate the housing shortage.

4. The adoption of the proposed General Plan amendment will not exceed the annual limit on amendments specified by Government Code Section 65358(b) because adoption of the Housing Element is the first amendment of the element in 2024.
5. The Housing Element substantially complies with Housing Element Law, as provided in Government Code 65580 et seq., and contains all provisions required by State Housing Element Law, as shown in Attachment C to the Board memorandum accompanying this resolution.
6. Based on substantial evidence in the record, including extensive analysis of recent completed residential development and redevelopment both within the unincorporated County and in incorporated areas throughout San Mateo County, and extensive analysis of proposed and ongoing development and redevelopment projects both within the unincorporated County and in incorporated areas throughout San Mateo County, the existing uses on the non-vacant sites identified in the site inventory to accommodate the RHNA are likely to be discontinued during the planning period and therefore do not constitute an impediment to planned residential development on the site during the planning period.
7. As required by Government Code Section 65585(e), the San Mateo County Board of Supervisors has considered the findings made by HCD included in the HCD's letter to San Mateo County dated January 20, 2023, consistent with Government Code Section 65585(f), and as described in

Attachment B to the board memorandum accompanying this resolution, incorporated herein, the Housing Element has been amended in response to the findings of the HCD to substantially comply with the requirements of State Housing Element Law as interpreted by State Department of Housing and Community Development.

8. The 2014-2022 San Mateo County Housing Element of the General Plan is hereby repealed in its entirety, and the 2023-2031 Housing Element, attached as Exhibit A to this resolution, incorporated herein, is adopted.
9. This resolution shall become effective upon adoption by the Board of Supervisors.
10. The Director of Planning and Building or designee is hereby directed to file all necessary material with HCD for HCD to find that the Housing Element is in conformance with State Housing Element Law and is further directed and authorized to make all non-substantive changes to the Housing Element to make it internally consistent or to address any non-substantive changes or amendments requested by the HCD to achieve certification.
11. The Director of Planning and Building or designee is hereby directed to distribute copies of the Housing Element in the manner provided in Government Code Sections 65357 and 65589.7

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RESOLUTION NO. _____

BOARD OF SUPERVISORS, COUNTY OF SAN MATEO, STATE OF CALIFORNIA

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RESOLUTION ADOPTING THE NEGATIVE DECLARATION FOR A GENERAL PLAN AMENDMENT TO REPEAL THE 2014-2022 SAN MATEO COUNTY HOUSING ELEMENT OF THE GENERAL PLAN AND ADOPT THE 2023-2031 SAN MATEO COUNTY HOUSING ELEMENT OF THE GENERAL PLAN

RESOLVED, by the Board of Supervisors of the County of San Mateo, State of California, that

WHEREAS, in compliance with State Housing Element Law (Government Code Sections 65580 et seq.), San Mateo County has prepared the 2023-2031 Housing Element (the Housing Element), which, upon adoption by the Board of Supervisors, will replace the 2014-2022 Housing Element; and

WHEREAS, as provided in Government Code Section 65350 et. seq., adoption of the Housing Element constitutes a General Plan amendment; and

WHEREAS, said adoption of the Housing Element is considered a “Project” as that term is defined under the California Environmental Quality Act (“CEQA”); and

WHEREAS, the County prepared an Initial Study and Negative Declaration for this project, consistent with the requirements of CEQA, and determined that as a programmatic document that does not directly impact the environment absent subsequent implementation actions, adoption of the Housing Element has no potential environmental impacts, and no mitigation measures are required; and

WHEREAS, the Initial Study and Negative Declaration were posted on May 3, 2023, and noticed and circulated for comment for 30 days in accordance with the requirements of CEQA; and

WHEREAS, the County Planning Commission conducted a duly noticed public hearing on April 10, 2024, and received public comment, and has recommended that this Board of Supervisors adopt the Negative Declaration as complete, correct and adequate, and prepared in accordance with CEQA and applicable State and County guidelines; and

WHEREAS, this Board of Supervisors held a duly noticed public hearing on April 23, 2024, to consider the Negative Declaration and the proposed General Plan amendment and to take public testimony; and

WHEREAS, this Board of Supervisors, in its independent judgement and analysis, has considered the Initial Study and Negative Declaration, along with comments received, and finds on the basis of the whole record before it that there is no substantial evidence that the Project will have a significant effect on the environment; and

NOW, THEREFORE, IT IS HEREBY DETERMINED AND ORDERED that the Board of Supervisors adopts the attached Negative Declaration as complete, correct and adequate, and prepared in accordance with the California Environmental Quality Act and applicable State and County guidelines.

BE IT FURTHER RESOLVED that the resolution shall become effective immediately upon its passage and adoption.

* * * * *

INTRODUCTION

The 2023-2031 (Cycle 6) Housing Element of the San Mateo County General Plan constitutes an assessment of the County's current and future housing needs, and presents a housing plan with goals, policies, and specific programs to meet those needs over the next 8 years and beyond. The Housing Element is the document the County uses to:

- Analyze current and future housing needs for all areas, communities, and residents of the unincorporated County, for all types of housing.
- Identify existing and potential housing constraints, resources, and opportunities.
- Establish the County's housing objectives, and a housing plan including policies and programs to achieve them.
- Identify sufficient developable housing sites to meet the County's estimated share of projected regional housing need over the next 8 years.

Like other jurisdictions in San Mateo County, the larger region, and increasingly all parts of the state, the County continues to face severe housing pressures, rising housing costs, and housing shortages of all kinds, particularly for lower-income groups, special needs populations, and other residents who face distinct housing burdens. In addition, housing shortages in urbanized areas throughout the region have contributed to sprawling and inefficient development patterns, loss of open space and damage to natural resources, and increasingly long worker commutes with concomitant increased automobile traffic, greenhouse gas emissions, and contributions to climate change.

The overarching aim of the Housing Element is to address these conditions, by promoting the production of housing sufficient to meet the current and projected housing needs of the County's diverse communities, preserving and improving existing affordable housing, encouraging and facilitating development in locations near employment, services and infrastructure, and balancing the challenges of protecting the County's valuable resources and preserving the unique character of the County's communities, while helping provide sufficient, suitable housing for all residents. To that end, the Housing Element establishes the following broad goals, each implemented by more specific policies, and detailed programs with quantified objectives:

- Protect Existing Affordable Housing Stock
- Support New Housing for Extremely Low to Moderate-Income Households
- Promote Sustainable Communities through Regional Coordination Efforts and Locating Housing Near Employment, Transportation, and Services
- Promote Equal Housing Opportunities

- Promote Equity through Housing Policy and Investments
- Require or Encourage Energy Efficiency, Resource Conservation, and Climate Resiliency Design in New and Existing Housing

The goals, policies and programs of the Housing Element are consistent with and advance the County’s adopted Shared Vision, which informs all of the County’s work:

Healthy and Safe Community. Our neighborhoods are safe and provide residents with access to quality health care and seamless services.

Prosperous Community. Our economic strategy fosters innovation in all sectors, creates jobs, builds community and educational opportunities for all residents.

Livable Community. Our growth occurs near transit, promotes affordable, livable connected communities.

Environmentally Conscious. Our natural resources are preserved through environmental stewardship, reducing our carbon emissions, and using energy, water and land more efficiently.

Collaborative Community. Our leaders forge partnerships, promote regional solutions, with informed and engaged residents, and approach issues with fiscal accountability and concern for future impacts.

ORGANIZATION OF THE HOUSING ELEMENT

The Housing Element is organized in the following sections:

- Introduction and Executive Summary
- Housing Plan: Goals, Policies and Programs
- Regional Housing Needs Assessment and Adequate Sites Inventory
- Background Appendices:
 - A. Demographics, Housing Conditions and Needs
 - B. Housing Constraints Analysis
 - C. Housing Resources
 - D. Assessment of Prior (2014-2022) Housing Element
 - E. Detailed Sites Inventory and Methodology
 - F. Public Outreach and Participation
 - G. Analysis of Fair Housing and Fair Housing Action Plan

EXECUTIVE SUMMARY

HOUSING PLAN: GOALS, POLICIES AND PROGRAMS

Section 1 of the Housing Element contains the County's Housing Plan, which presents the goals, policies and programs for addressing the County's housing needs, resources and constraints described in the Housing Element. The section is divided by six overarching housing goals:

- Protect Existing Affordable Housing Stock
- Support New Housing for Extremely Low to Moderate-Income Households
- Promote Sustainable Communities through Regional Coordination Efforts and Locating Housing Near Employment, Transportation, and Services
- Promote Equal Housing Opportunities
- Promote Equity through Housing Policy and Investments
- Require or Encourage Energy Efficiency, Resource Conservation, and Climate Resiliency Design in New and Existing Housing

The policies and implementing programs for each goal are presented in detail in Section 1, along with the department, agency, or other entity responsible for implementation, the timeframe for implementation, and specific implementation targets. A summary of key policies includes the following:

Support Conservation and Rehabilitation of Viable Deteriorating Housing by:

- Funding rehabilitation of lower-income, deed-restricted, multifamily rental properties.
- Supporting home repair programs operated by nonprofit agencies.
- Encouraging lead mitigation and energy, water, and resilience/weatherization retrofits in naturally occurring affordable housing stock.
- Incentivizing retrofits for energy, seismic upgrades, weatherization, and water efficiency appliances in existing affordable housing.

Continue to Prohibit Conversions of Rental Housing to Condominium Ownership.

Retain Existing Lower-Income Units, especially those at risk of conversion to market rate housing, by:

- Monitoring managing the County’s stock of units with affordability restrictions to ensure units remain affordable.
- Responding to notices of intent to convert assisted affordable housing projects to market-rate housing.
- Studying extending affordability terms on County loans to 99 years.

Continue to Provide Rent Subsidies to Lower-Income Households.

Protect the County’s Mobile Home Park Tenants, by:

- Regulating potential closure of parks and mitigating impacts on residents.
- Regulating mobile home rent increases.
- Monitoring park operations and rents to ensure compliance with County regulations, and improving data systems to support reporting required of mobile home park owners/operators.
- Creating a system to automate mobile-home complaint distribution and response.
- Studying policies and funding to preserve mobile home parks as affordable through conversion of ownership or control to resident organizations, nonprofit sponsors, land trusts, or local public entities.

Support Community Resources for Landlords and Tenants, by providing financial support to community-based organizations working to educate landlords and tenants about their rights and responsibilities and providing referrals, mediation and other assistance.

Minimize Displacements Due to Code Enforcement by coordinating all code enforcement actions that have the potential to result in displacement with the Housing Department.

Amend Zoning and General Plan Land Use Designations to Meet Future Housing Needs, including by:

- ~~Implementing additional zoning updates in North Fair Oaks consistent with the Community Plan.~~ (Note: This program is complete).
- Assessing implementation of the North Fair Oaks Community Plan and determining amendments to meet community needs and fair housing and equity goals.
- Implementing the Rezoning Program, HE 11.2, rezoning 126 parcels constituting 42 acres to allow high-density multifamily residential development by-right.

- ~~• Rezoning one vacant residential parcel included in consecutive Housing Element Sites Inventories, to comply with state law. (Note: The Rezoning Program has been comprehensively revised).~~
- Monitoring housing production against the County's RHNA and adjusting implementation strategies and policies and programs as needed.

Encourage Residential Uses in Commercial and other Non-Residential Zones, by:

- ~~• Adding residential uses as ministerially permitted uses in specific commercial areas and zoning districts in North Fair Oaks. (Note: This program is complete).~~
- Exploring other County non-residential areas for rezoning to permit mixed use and residential development.
- Pursuing opportunities for acquisition and/or rehabilitation of sites for affordable housing development, including conversion of commercial and other properties.
- Investigating opportunities for affordable housing development on lands owned by school districts and faith-based organizations.

Encourage Residential Mixed-Use and Transit Oriented Development, by:

- Encouraging and facilitating infill development on vacant or redevelopable lots in already developed areas.
- Including policies and regulations encouraging transit-oriented development in revisions to area plans.

Support Development of Affordable and Special Needs Housing on Available Sites, by

- Refining GIS-based mapping applications to inform developers of housing sites.
- Continuing to expedite permit review and waive planning and building fees for projects providing housing affordable to lower-income households, including seniors, special needs populations, and persons with disabilities.
- Continuing to support infrastructure expansion and identify opportunities for County assistance with infrastructure improvements to support housing.
- Investigating and refining the list of County-owned parcels, including surplus and underutilized properties with potential for affordable housing, and working to make those parcels available for affordable housing development.

Continue to Apply the County's Local Density Bonus Ordinance to grant density bonuses to all eligible projects, **and further amend the ordinance to comply with recent changes to state law.**

Continue to Use Available Funds to Increase the Supply of Lower-Income Affordable Housing through support for site acquisition and new construction.

Continue to Use Available Funding to Support Affordable Housing and Supportive Services for Special Needs Populations, investigate new resources for these activities and adopt building design standards and permitting procedures to require and encourage units appropriate for special needs groups.

Increase Accessibility of Housing by encouraging and requiring developers to use Universal Design elements for new construction, and by adopting formal reasonable accommodation procedures.

Incentivize and Support Affordable Housing Opportunities for Large Family Households by funding affordable family housing for large families with lower incomes and encouraging housing developments assisted by the Housing Department to include larger units, **and by encouraging developers to use the large-family household provision in the County's Inclusionary Housing Ordinance.**

Undertake a Study of Housing Conditions and Needs in the Rural South Coast.

Complete an Initial Assessment of the Need and Feasibility of a Pescadero Community Plan.

Support the Development of Housing for Farm Laborers, and Monitor the Quality and Safety of Farm Labor Housing Sites, by:

- Advocating for federal/state legislation and funding for programs to provide housing for farmworkers.
- Continuing to use local funding to support farm worker housing programs, and identifying additional local funding.
- Collaborating with housing developers to identify sites for affordable housing for farmworkers, and with local partners to assess opportunities to expand and/or renovate existing farm labor housing sites.
- Monitoring and inspecting farm labor housing sites to assess the health and safety of employees.
- Engaging with community organizations, regional groups, agricultural stakeholders, and regulatory agencies to identify barriers to new affordable farmworker housing.

- Completing an updated and expanded farm labor housing study and strategy to assess and address farm labor housing needs.
- Completing a site-by-site analysis of potential farm labor housing sites in the rural Coastal Zone, and identifying strategies to facilitate development of these sites.

Provide Affordable Housing Opportunities and Supportive Services to Homeless Individuals and Families, by:

- Continuing to use federal, state and local funds to support emergency, interim, and permanent housing.
- Continuing to require that at least 5% of units in affordable housing projects funded with local funds are set aside for homeless households, and prioritizing projects that set aside 20% or more of units for the homeless.
- Securing local, state and federal funding to acquire and operate interim and permanent supportive housing.
- Continuing to support community-based organizations that provide rapid rehousing, housing navigation services and other homelessness prevention efforts.
- Continuing to support the County’s Center on Homelessness by implementing housing strategies promulgated through the Ending Homelessness in San Mateo County report.

Assist and Support the Development of Housing for Extremely Low-Income Households of All Types, by promoting inclusion of rental and ownership housing priced for extremely low-income households in all possible housing developments and other new housing created, assisted, or incentivized by County policies, and providing targeted financial and other assistance for creation of housing for extremely low-income households as part of funding programs provided by the County.

Review And Amend The County’s Regulations To Facilitate Production Of Special Needs Housing.

Continue County Participation in and Facilitation of Inter-Jurisdictional and Cross-Sectoral Collaborations for housing planning and development.

Strengthen and Clarify County Inclusionary Housing Requirements, by considering adding inclusionary requirements for larger-scale single-family residential developments, modifying administrative guidelines for the Inclusionary Ordinance to provide clarity and flexibility, and exploring revisions to in-lieu fee, off-site, and land dedication options to ensure these are consistent with the intent to promote sufficient affordable housing.

Continue to Impose and Collect the County's Existing Affordable Housing Impact Fee while undertaking a new nexus study determining current need and appropriate fee levels.

Encourage and Facilitate Accessory Dwelling Unit Development by:

- Implementing the County's ADU ordinance.
- ~~Implementing the County's ADU amnesty program. (Note: this program has been indefinitely suspended).~~
- Implementing an ADU permit streamlining program, which expedites permit processing for ADUs.
- ~~Continuing to manage the "ADU One Stop Shop" pilot program. (Note: this is now included in the ADU Resource Center, below).~~
- ~~Launch a new multijurisdictional ADU Resource Center, to provide tools, educational materials, and dedicated staff to help jurisdictions and homeowners to expand on the work first established with the One Stop Shop pilot program.~~
- Participating in HEART's multijurisdictional effort to create pre-approved ADU design templates.
- ~~Adopting pre-approved ADU design templates.~~
- ~~Updating the County's ADU ordinance to comply with recent changes to state law.~~

Continue to Provide Support for Affordable Homeownership Opportunities for lower-income residents, including providing technical assistance to HEART for its first-time homebuyer program.

Continue to Support Programs That Facilitate Co-Living as a way to use existing housing stock to fit diverse housing needs and help both existing homeowners and residents seeking affordable housing.

Minimize Permit Processing Fees, by continuing fee reductions and waivers for affordable housing, and reviewing and potentially revising fee policy and procedures to clarify and streamline the process.

Update Parking Standards to reflect the parking needs of different types of affordable housing and transit-oriented-development.

Promote Community Participation in Housing Plans, by providing education materials and outreach regarding housing needs, and supporting efforts by nonprofits and jurisdictions to promote diverse community participation in the development, implementation, and monitoring of housing plans.

Encourage Transit Oriented Development, Compact Housing, and Mixed-Use Development in appropriate area throughout the county, such as transit corridors and commercial areas.

Enforce Fair Housing Laws, by continuing to fund fair housing enforcement, education, and technical assistance, **consolidating and expanding the County's public-facing fair housing resources, and submitting an Equity Plan to HUD.**

Encourage the Development of Multi-Family Affordable Housing in High Opportunity Areas, as defined by the Department of Housing and California Department of Housing and Community Development.

Support Anti-Displacement and Preservation Efforts in Lower- Resourced Communities of Color by continuing to provide funding for preservation of existing affordable housing and creation of new affordable housing developments in Low Resource and High Segregation & Poverty Areas.

Support the Creation of Program That Aim to Reduce Displacement in Local Communities of Color, by supporting and expanding the City of East Palo Alto's Affordable Housing Preservation Strategy.

~~Promote the Hiring of Economically Disadvantaged Workers and Certified Minority and Women-Owned Business in the development or rehabilitation of affordable housing.~~

Encourage Developers and Contractors to Hire Local Labor, and provide public-facing labor resources.

Promote Energy Conservation and Transition From Natural Gas to All-Electric Appliances In Existing Housing, by encouraging property owners and renters to access energy assessments, programs, and rebates, and promote solar roof systems and other passive solar devices in coordination with batteries in multifamily affordable housing.

SITES INVENTORY AND REGIONAL HOUSING NEEDS ASSESSMENT

A key component of the Housing Element is the identification of sufficient development capacity to meet the County's housing need over the 8 years of the Housing Element planning period. State law requires that every jurisdiction's Housing Element demonstrate that the jurisdiction has sufficient appropriately zoned developable or redevelopable land to accommodate the jurisdiction's share of regional housing need, as determined by the California Department of Housing and Community Development (HCD) and the local Council of Governments (COG). In the Bay Area, the COG is the Association of Bay Area Governments (ABAG), which estimates housing need for the region, and apportions a share of projected need to every jurisdiction; a jurisdiction's individual share of housing need is its Regional Housing Needs Allocation, or RHNA. The RHNA includes both total

projected residential units needed to meet demand over the next 8 years, and a breakdown of housing units needed by income level.

The County’s RHNA shown below. The County will need 2,833 housing units in total, with 811 units for very low-income households, 468 for low-income households, 433 for moderate-income households, and the remainder for above moderate-income households.

San Mateo County RHNA, 2023 - 2031

Income Category	% of County Area Median Income (AMI)	Units	% of Units
Very Low	0-50%	811	29%
Low	51-80%	468	17%
Moderate	81-120%	433	15%
Above Moderate	120% +	1,121	40%
Total		2,833	100%

Appendix E includes the full Adequate Sites Inventory and methodology, including:

- A detailed inventory and description of developable and redevelopable sites, divided into vacant single-family zoned sites, vacant multifamily zoned sites, and non-vacant multifamily zoned sites;
- Projects already planned, approved, entitled, or otherwise underway;
- Projected future development of accessory dwelling units (ADUs), and;
- A map of all sites identified to meet the County’s RHNA.

The combination of these categories does not provide sufficient capacity for the County to meet its RHNA in total, as shown below, there is a deficit in very low-income category, and limited surplus capacity in the low-, and moderate-income categories of housing need. To account for this deficit, the Housing Element incorporates a Rezoning Program, Policy HE 11.3 of the Housing Plan. The Rezoning Program identifies 126 parcels constituting approximately 42 acres, located in the unincorporated Colma, Broadmoor, Harbor Industrial, and Midcoast areas, currently zoned either for commercial and industrial development, or for very low intensity residential development, that will be rezoned to provide additional capacity for residential development to meet the County’s RHNA. The County’s capacity to meet the RHNA, without rezoning and with rezoning, is shown in the tables below.

RHNA vs Development Capacity (without rezoning)

Income Category	RHNA	Vacant SFR	Vacant MFR	Non-Vacant MFR	Pipeline (RHNA Credits)	ADUs	Total Units	Surplus/ (Deficit)
Very Low	811	0	23	253	254	0	530	(281)
Low	468	0	23	253	196	60	532	64
Moderate	433	0	23	253	44	120	440	7
Above Moderate	1,121	387	27	253	147	60	874	(247)
Total	2,833	387	98	1,011	641	240	2,377	(456)

RHNA vs Development Capacity (with rezoning)

Income Category	RHNA	Total Units	Original Surplus/ (Deficit)	Units from Rezoning	Surplus/ (Deficit) w/ Rezoning
Very Low	811	530	(281)	619	339
Low	468	532	64	619	684
Moderate	433	440	7	619	627
Above Moderate	1,121	874	(247)	619	373
Total	2,833	2,377	(456)	2,477	2,021

DEMOGRAPHICS, HOUSING CONDITIONS AND NEEDS

To help determine the amounts and types of housing needed in the unincorporated County, the Housing Element assesses demographics, housing supply and production trends, housing stock characteristics, housing costs, affordability, tenure, and other housing conditions, special needs populations, and various other factors that impact housing needs. This assessment is described in Appendix A. Key factors include:

Population. The unincorporated County's population has grown moderately over the last decade, largely keeping pace with the growth of the County overall. At 66,000 residents as of 2020, unincorporated population remains approximately 8% of total County population. However, while population growth in the unincorporated County did not change dramatically, it still outpaced housing production.

Age. The County's population is aging, with the greatest increase in the age groups over 55 years. However, there was also a significant increase in the 18 to 34-year-old age

group, likely driven by an influx of younger workers. The aging of the County's population may indicate changes in the types of housing required for older residents.

Employment Growth. Job growth in the unincorporated County has been low compared to incorporated areas, but because employment growth creates regional housing pressures, overall job growth has increased demand and contributed to housing shortages in both incorporated and unincorporated areas.

Housing Tenure and Type. Most of the unincorporated County's housing, approximately 75%, is owner-occupied. However, younger residents, as well as black and Hispanic residents, are significantly more likely to be renters than other residents. In addition, most of the unincorporated County's housing is detached, single-family ownership housing, while the small amount of multifamily housing stock is primarily rental housing. There is a need for a greater variety of housing types, particularly more multifamily and rental housing, to serve the diverse needs of the County's residents.

Housing Affordability and Overpayment. Housing costs continue to be unaffordable to most County residents, and many households in the County, including a disproportionate number of renter households, as well as younger households, overpay for housing.

Overcrowding. Overcrowding is a problem in most unincorporated areas, and is particularly significant for renter households.

Farm Labor Housing. The unincorporated County's farm labor population has declined over the past decade, but there remains a shortage of farm labor housing, and farm laborers face significant housing affordability issues.

Housing for Disabled Persons. While the unincorporated County's disabled population did not significantly increase over the past decade, persons with disabilities face unique affordability challenges and may require a variety of specific housing types, and housing affordable and accessible for persons with disabilities continues to be a distinct need.

Housing for the Homeless. Like almost every jurisdiction in the County, the unincorporated County's homeless population has increased, indicating a continued need for various types of housing for the homeless, as well as underscoring the significant, consistent need for affordable housing of all kinds.

Housing Stock Conditions. The County's housing stock is largely maintained in good condition, without significant need for rehabilitation assistance. However, there are two notable areas with identified need for assistance: farm labor housing and mobile home parking housing; the County's commitment to address these needs is describe in the Housing Plan. In addition, the quality of housing stock in the Rural South Coast is inadequately known; this issue is addressed by the Rural South Coast Housing Study described in the Housing Plan.

Coastal Zone Housing. Approximately 1,800 units have been built in the County's Coastal Zone since 1982. The vast majority of these units have been single-family homes. There have been no conversions or demolitions of multifamily, low- or moderate-income housing in the Coastal Zone since adoption of the prior Housing Element, and no recorded replacements, conversions or demolitions of dedicated low- or moderate-income housing units in the unincorporated County's Coastal Zone since January 1, 1982.

CONSTRAINTS TO HOUSING PRODUCTION

Constraints to the development of housing include non-governmental constraints, including the cost of construction, environmental factors, and natural hazards, and governmental constraints over which the County may have control, including development regulations, approval processes, time, costs, and other factors.

Significant non-governmental constraints include the cost of housing production, including land and construction costs, as well as the availability of financing, particularly for affordable housing. These costs have all risen over the past decade, and in recent years have been particularly high, posing significant challenges for production of multifamily housing in particular.

The unincorporated County also has a diverse range of conditions, with varied geography, terrain, and infrastructure, including protected natural resource, open space and recreational areas, active and protected farmland, and areas served only by well water and septic systems. In addition, a variety of natural hazards, including seismic risk, flood, wildfire, tsunami, and other risks may impact development feasibility. However, while many of these factors may ultimately pose constraints to additional housing development, at present there remains sufficient unconstrained, developable land to meet the County's housing needs over the next 8 years.

The County made significant strides in reducing constraints to housing production during Housing Element Cycle 5 (2014-2022), including:

- Updated Accessory Dwelling Unit (ADU) regulations and permitting processes, reducing regulatory barriers to ADUs, expediting ADU processing, and streamlining and facilitating ADU production in all areas of the County.
- Updated Density Bonus Regulations to allow additional density and other development exceptions for projects providing affordable housing, consistent with state law.
- Full implementation of all newly-adopted state laws regarding housing production and streamlining, including the Housing Accountability Act, SB-35, and others.

- Adoption and application of objective design standards for various kinds of development in most areas of the County, reducing the time and cost of review and approval.
- A blanket prohibition on the use of ADUs as short-term rentals, a prohibition on all short-term rentals outside the Coastal Zone, and strict regulations on short-term rentals in the County's Coastal Zone, helping preserve housing units for long-term occupancy.
- Streamlined farm labor housing permitting, and a pilot program funding new farm labor housing units.
- Permitting emergency shelters by-right in the Planned Colma District, and allowing shelters as a conditionally permitted use in multiple other areas.
- Adoption of new high-density residential zoning of up to 120 units/acre in proximity to transit in the North Fair Oaks community.
- A new entirely electronic Application and Permit Review Process, streamlining submittal, review, comment, and revisions of project applications, and issuance of permits.
- The creation and implementation of the Affordable Housing Fund, an annual Notice of Funding Opportunity providing funds towards the construction and preservation of affordable housing units in the County.

However, there remain potential regulatory and other governmental constraints that may impact housing production, and the County will continue to take steps to encourage and facilitate housing production, streamline development processing, apply objective standards, and address other constraints within its control over the next eight years, as described in the policies and programs included in the Housing Plan in Section 1.

HOUSING RESOURCES

The County Department of Housing (DOH), made up of the Housing and Community Development Division and the Housing Authority of the County of San Mateo, is a primary provider and coordinator of housing resources. The Department collaborates with diverse stakeholders to facilitate the development and preservation of affordable housing through the provision of local, state, and federal funding to unincorporated areas and incorporated jurisdictions, along with the sharing of best practices and innovative policies. The Department also supports public service agencies, microenterprises, homeless and transitional shelters, core services, and fair housing organizations through grant funding and technical assistance. The Housing Authority also directly provides rental subsidies to

low-income households, manages County-owned housing projects, and provides funding and support for preservation and development of affordable housing.

Federal Resources available in the County include various federal resources such the Community Development Block Grant Program (CDBG), HOME Investment Partnership (HOME) Program, Emergency Solutions Grants (ESG) Program, and the U.S. Department of Housing and Urban Development's (HUD) Section 8 Rental Voucher Programs. DOH also helps manage a significant amount of emergency pandemic-related housing resources made available through the Coronavirus Aid, Relief, and Economic Security (CARES) Act and the Federal American Rescue Plan (ARP).

Local Resources include:

- The County's Affordable Housing Fund (AHF), initially funded by funds held by former redevelopment agencies and now supported on an ongoing basis by dedicated Measure K funds, derived from a countywide half-cent sales tax.
- The County's Inclusionary Housing Ordinance which requires all new multi-family developments creating five or more units to set aside a minimum of 20% of the total units for extremely low to moderate income households. The County also has an affordable housing fee applicable to most development not subject to the inclusionary requirement; the fees are collected in the AHF, and disbursed by the Housing Department.
- DOH coordinates the dedication of County-owned land for development of affordable housing, and the Housing Authority of the County of San Mateo manages two County-operated affordable housing projects.
- The countywide housing trust fund, the Housing Endowment and Regional Trust (HEART), supports construction, rehabilitation, and purchase of affordable housing for low and middle-income workers and residents on fixed incomes.
- The County Human Services Agency's (HSA) Center on Homelessness is responsible for coordination of homeless services within County agencies, and also works with non-profits, other local governments, business and other parts of the community. HSA and DOH work in partnership to support housing and social services that address the needs of homeless and at-risk individuals and families.

State Resources create and preserve affordable housing for low-income households, and for a variety of special needs populations, including farm labor housing, various supportive and transitional housing, housing for persons with disabilities, housing for the homeless or those at risk of homelessness, and various other populations. Those that are managed directly by DOH include the Local Housing Trust Fund Program (LHTF); Housing for a Healthy California Program (HHC); the Mental Health Services Act (MHSA) Housing Program No Place Like Home (NPLH) Permanent Local Housing Allocation

(PHLA); and the Homekey Program. Other State Resources that are available directly to developers and non-profit organizations include the Multifamily Housing Program (MHP); Infill Infrastructure Grant Program (IIG); Veterans Housing and Homelessness Preventions Program (VHHP); Joe Serna, Jr. Farmworker Housing Grant (FWHG) Program; Affordable Housing and Sustainable Communities Program (AHSC); State Low Income Housing Tax Credits (State LIHTC); and Tax-Exempt Bond Financing.

Regional Resources. The County also participates in a variety of regional collaborations and partnerships focused on addressing regional housing issues and collectively planning for and funding housing needs, including intergovernmental collaborations, and collaborations across the public, private, and nonprofit sectors.

ASSESSMENT OF PRIOR HOUSING ELEMENT

Appendix D includes an assessment of the status, progress, and accomplishments of each of the policies and programs in the 2014-2022 Housing Element. Accomplishments during Housing Element Cycle 5 include:

- Significant strides to increase the production of accessory dwelling units.
- Expansion of health and safety inspections in multifamily residential structures.
- Development of new revenue sources for affordable housing.
- Streamlining of residential development approval processes.
- Contribution of significant funding and other resources for the production and preservation of affordable housing, direct assistance for low-income renters and homebuyers, and for fair housing enforcement assistance.
- Adoption new regulations protecting mobile home parks from conversion, and provided financing and other assistance for mobile home rehabilitation and replacement.
- Assistance for energy efficiency audits and upgrades in residential structures, and new requirements for solar installation and all-electric construction in residential and commercial buildings.
- Adoption of a number of new high-density residential zoning districts, allowing up to 120 units/acre in proximity to transit.
- **The County's programs have cumulatively provided significant support for the housing needs of special needs populations, but despite these efforts, greater support is needed, as recognized in the programs in the Housing Plan.**

PUBLIC OUTREACH AND PARTICIPATION

Robust public engagement and participation is essential to the Housing Element update process. Public participation and input help to identify the housing issues faced by community and the policies and programs best suited to address those issues, as well as helping frame the County's overall approach to housing issues.

To engage community members in the Housing Element update process and solicit input on housing issues, needs, and strategies, the County participated in, co-facilitated, and/or held a number of forums, workshops, and hearings, as well as distributing a housing survey, and receiving comment by other means. Outreach, input, and participation included:

With the Let's Talk Housing Countywide collaboration:

- Community Conversation: A Housing Element Update Countywide Forum and Workshop
- Four Housing Element Stakeholder Listening Sessions, with stakeholders in the following areas:
 - Fair Housing;
 - Housing Advocates;
 - Builders and Developers;
 - Service Providers
- Creating an Affordable Future Webinar Series, a series of presentations and discussion forums on the broad implications of housing policy:
 - Why Affordability Matters
 - Housing and Racial Equity;
 - Housing in a Climate of Change;
 - Putting it All Together for a Better Future
- All About RHNA webinar, a web-based training to help educate community members on the regional housing needs allocation process, the sites inventory requirement, and related issues.
- Informational Videos: 21 Elements/Let's Talk Housing helped produce two informational videos, to ensure that information on the Housing Element update was available and accessible in a short, comprehensible format.

Equity Advisory Group. The County, in collaboration with other jurisdictions, relied on guidance and input from an Equity Advisory Group (EAG), composed of various stakeholders, organizations and experts working on equity issues.

Unincorporated County-specific hearings and forums included:

- ✓ North Fair Oaks Community Council, July 15, 2021, September 15, 2021, and December 16, 2021
- ✓ Sustainable Pescadero, March 2, 2022 and April 6, 2022
- ✓ Midcoast Community Council, May 25, 2022
- ✓ San Mateo County Planning Commission, March 23, 2022
- ✓ San Mateo County Board of Supervisors, May 17, 2022
- ✓ San Mateo County Planning Commission, November , 2022
- ✓ San Mateo County Board of Supervisors, December 6, 2022
- ✓ San Mateo County Board of Supervisors, December 13, 2022

Websites. The County maintained a Housing Element update [website](#), with information on the update process, links to the housing survey, information on outreach efforts and public input, as well as a separate website through the Let's Talk Housing collaborative, with both San Mateo County-specific [information](#), and information on interjurisdictional Housing Element update efforts.

The County distributed a Housing Issues and Needs Survey, focused on unincorporated County housing issues, needs, and other input.

Consultants engaged through the 21 Elements collaborative to complete a fair housing assessment for every jurisdiction also conducted an Affirmatively Furthering Fair Housing resident survey focused on fair housing issues.

Summary and Key Themes of Input Received

Key themes in input from community members, stakeholders, workshop and forum participants, survey respondents, and others included:

- Housing costs are an almost universal concern.
- More housing supply is needed, although there is diversity of opinion on how and where to provide it.
- There is a need for greater diversity of housing stock, with more multifamily housing, more housing for special needs populations, supportive housing, and housing appropriate for different household types.
- Housing pressures are making it difficult or impossible for workers and families to stay in their communities.
- Housing costs, as well as pressures from new development, are driving gentrification and displacement.
- New development and increased density, including development driven by state mandates, may negatively impact traffic, parking, infrastructure, open space, and

services, and there is an urgent need to comprehensively plan to address these impacts.

- The development process and the permitting process are too slow, too costly, too opaque, and too inefficient.
- Transportation, climate change, and access to jobs and educational opportunities are all issues that relate to housing, and should be addressed together.
- The County's Housing Element, as well as other County policies, should recognize housing inequities and the disparate impacts of housing issues across different communities, and explicitly consider and address equity and fair housing issues.
- The County should provide more resources for farm labor housing.
- There is a need for better information resources on housing issues and policies and on the availability of affordable housing.

The County also received letters from several advocacy organizations in the early stages of the Housing Element update, providing generalized policy guidance.

The 2023-2031 Draft Housing Element was released for public review on November 16, 2022. The comment period closed on December (18), 2022.

After release of the Public Draft, the County received a number of letters and emails commenting on the draft. In addition, the County engaged in discussion with various stakeholders and groups providing informal comment.

The substance of comments received both prior to and after public release of the Draft Housing Element, and the response and outcomes are summarized in Appendix F. The comments resulted in various amendments to the policies and programs in the Housing Plan to make them more robust and more precise, changes to the Sites Inventory, and various minor edits to clarify minor issues identified in the comments.

All materials for Countywide and unincorporated County-specific outreach meetings through Let's Talk Housing offered materials in English and Spanish, and simultaneous language translation was offered in Spanish, Vietnamese and Chinese for Countywide meetings, and English and Spanish for unincorporated County-specific meetings. County outreach materials, including websites, emails and housing surveys were offered in English and Spanish, as were County announcements via social media, notification, update, and solicitation of input emails.

FAIR HOUSING ASSESSMENT

Fair housing is the condition in which all residents, regardless of race, ethnicity, gender, income, class, sexual orientation, ability status, or other status have equal access to housing.

Affirmatively furthering fair housing (AFFH) “means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. The duty to affirmatively further fair housing extends to all of a public agency’s activities and programs relating to housing and community development. (Gov. Code, § 8899.50, subd. (a)(1).)”

By law, all public agencies in the State must affirmatively further fair housing, and every jurisdiction’s Housing Element must incorporate an analysis of fair housing conditions, and policies and programs to address housing disparities and inequities.

The County’s AFFH assessment, findings, and policy recommendations are included in Appendix G. The analysis includes background on the history of segregation in the Bay Area and a timeline of major fair housing milestones; the remaining sections assess fair housing patterns and conditions in the unincorporated areas, and provide policy and programmatic guidance to address findings.

The analysis is divided in four sections. Section I, Fair Housing Enforcement and Outreach Capacity, reviews lawsuits/enforcement actions/complaints against the County; compliance with state fair housing laws and regulations; and jurisdictional capacity to conduct fair housing outreach and education. Section II, Integration and Segregation, identifies areas of concentrated segregation, degrees of segregation, and the groups that experience the highest levels of segregation. Section III, Access to Opportunity, examines differences in access to education, transportation, economic development, and healthy environments. Section IV. Disparate Housing Needs identifies which groups have disproportionate housing needs including displacement risk.

The findings of the AFFH analysis include:

- No fair housing complaints were filed in unincorporated San Mateo County from 2017 to 2021.
- Racial and ethnic minority populations are disproportionately impacted by poverty, low household incomes, overcrowding, and homelessness compared to the non-

Hispanic White population in unincorporated San Mateo County. Additionally, racial and ethnic minorities are more likely to live in low resources areas and be denied for a home mortgage loan.

- North Fair Oaks is disproportionately impacted by high poverty, low education opportunity, low economic opportunity, high social vulnerability scores, concentrations of cost burdened households, overcrowding, and low resource scores.
- Many areas in the county have low environmental scores—which account for PM2.5, diesel PM, pesticides, toxic release, traffic, cleanup sites, groundwater threats, hazardous waste, impaired water bodies, and solid waste sites.
- Unincorporated San Mateo County has the same proportion of residents with a disability (8%) as the entire county (Figure III-17). Residents living with a disability in unincorporated areas are concentrated throughout the county. Additionally, the aging population is putting a strain on paratransit access countywide.
- Racial and ethnic minority students in unincorporated San Mateo County experience lower educational outcomes compared to other students.
- Over half of all renter households in unincorporated San Mateo County are cost burdened—spending more than 30% of their gross income on housing costs—and nearly one in three are extremely cost burdened—spending more than 50% of their gross income on housing costs (Figure IV-9). There are disparities in housing cost burden in unincorporated San Mateo County by race and ethnicity and family size.

Based on these findings the analysis includes a set of recommendations to address the identified disparities, shown in Appendix G-5. The recommended actions have been incorporated in the Policies and Programs in the Housing Plan, including policies to:

- Identify barriers for tenant-based voucher holders seeking housing in areas with greater access to resources and opportunities.
- Refine the ADU Amnesty and Loan Program to better provide ADU housing for low- or very low-income households.
- ~~Implement additional higher density transit-oriented zoning in North Fair Oaks. (Note: this program is complete).~~
- Assess the status of implementation of the North Fair Oaks Community Plan, including a specific fair housing assessment to determine unmet needs of North Fair Oaks residents.
- Inventory publicly-owned properties and incorporate fair housing assessment in the prioritization of use of these properties for below-market rate housing, .

and prioritize affordable development on parcels that score highly on the various TCAC opportunity scores that assess resource availability.

- Prioritize housing funding to provide affordable housing and supportive services for elderly and/or disabled persons, and adopt universal design standards and reasonable accommodation procedures to ensure the provision of housing appropriate for these populations.
- Work with the Housing Endowment and Regional Trust to target mortgage assistance to communities experiencing high rates of mortgage denials.
- Encourage transit-oriented, high-density development, and continue to participate in local and regional efforts to increase transit availability and accessibility, including for special needs populations.
- Continue to support fair housing enforcement, education, and technical assistance.
- Affirmatively market County-supported affordable housing to underrepresented communities.
- Prioritize affordable multifamily housing development in high opportunity areas, while continuing to invest in the creation and preservation of affordable housing in low resource areas.
- Promote hiring of economically-disadvantaged workers and certified minority- and women-owned business in housing development and rehabilitation.
- The rezonings in the Rezoning Program described in **Program HE 11.2** provide the opportunity to significantly diversify the production of affordable housing across county areas, directly addressing a variety of fair housing issues.
- Continue to provide technical assistance to HEART's first-time homebuyer program, which provides downpayment assistance to low-income homebuyers, a population that tends to be disproportionately impacted by fair housing issues.
- Support the creation of programs and policies intended to reduce displacement in low-income communities of color, including supporting, expanding, and replicating the lessons of the City of East Palo Alto's Affordable Housing Preservation Strategy.
- Incentivize and support affordable housing opportunities for Large Family Households, by prioritizing funding, linking affordable housing to childcare, and

encouraging developers to use the large family household option in the County's Inclusionary Housing Ordinance.

- Support creation and improvement of farm labor housing.
- Support development of a multilingual regional online affordable housing portal for residents seeking affordable housing.
- Submit an Equity Plan in response to HUD's new AFFH rules.

PLANNING AREA FOR THE HOUSING ELEMENT

The County's Housing Element addresses housing needs, issues, goals, and policies for the unincorporated portions of San Mateo only-- those areas not included within the legal boundaries of one of the 20 incorporated cities within the County. Each of the incorporated cities also has its own distinct Housing Element, which addresses its own housing plan.

The unincorporated county consists of approximately 309 square miles, with wide variety in the size, location, physical, economic and social characteristics of the various unincorporated areas. Unlike most contiguous cities, the unincorporated County includes disparate geographically separated areas that vary distinctly in character, including extensive undeveloped rural areas, significant active and protected agriculture, low-intensity rural and/or coastal communities such as King's Mountain, La Honda, and Pescadero, more urbanized coastal communities such as El Granada, Montara and Moss Beach, low-density bayside communities including Ladera and Los Trancos Woods, suburban scale bayside communities such as Emerald Lake Hills and West Menlo Park, and denser urban communities, largely consisting of unincorporated areas wholly surrounded by incorporated cities, such as North Fair Oaks, unincorporated Colma, Broadmoor and Devonshire. Approximately half of San Mateo County's total land area, but only roughly 8% of the county's population, is located in the unincorporated County.

While the assessment of housing needs and the programs and policies in the Housing Element focus primarily on the unincorporated County, the Housing Element also recognizes that housing is a countywide and region-wide concern, and that housing issues and needs are shared across jurisdictional boundaries, and may require solutions similarly shared across jurisdictions. Where appropriate, the analysis and the policies and programs included in the Housing Element reflect this fact.

STATE HOUSING ELEMENT REQUIREMENTS

All cities and counties in California must adopt and periodically update a Housing Element, as a mandatory element of the jurisdictions' General Plan. Detailed requirements for preparing, revising, and adopting Housing Elements are contained in the California Government Code, and are summarized by the California Department of

Housing and Community Development here: <https://www.hcd.ca.gov/housing-elements-hcd>.

The County's 2023-20031 Housing Element incorporates all of the substantive content required by State law, and the adoption and drafting process adheres to the procedural requirements of the law.

In order to take effect, the updated Housing Element must be certified by the California Department of Housing and Community Development as compliant with the requirements of state law, and must be adopted by the County Board of Supervisors. On certification and adoption, the updated Housing Element will replace the existing 2014-2022 Housing Element.

RELATIONSHIP OF THE HOUSING ELEMENT TO THE GENERAL PLAN AND OTHER LAND USE PLANS

The San Mateo County Housing Element is a mandatory element of the County's General Plan, required by state law. By law, it must also be consistent with the other elements of the General Plan, as well as other relevant adopted land use plans.

Consistency with the General Plan and Specific Area Plans

As an element of the General Plan, the Housing Element must be internally consistent with the other elements of the General Plan, including Vegetative, Water, Fish and Wildlife Resources; Soil Resources; Mineral Resources; Visual Quality; Historical and Archaeological Resources; Park and Recreation Resources; General Land Use; Urban Land Use; Rural Land Use; Water Supply; Wastewater; Transportation; Solid Waste; Housing; Natural and Man-made Hazards; Air Resources; and the Energy and Climate Change element. The updated Housing Element has been reviewed for consistency and is consistent with all other elements of the General Plan.

As part of the General Plan, the County has also adopted the following area plans for specific unincorporated communities: North Fair Oaks Community Plan, Emerald Lake Hills Community Plan, Montara-Moss Beach-El Granada Community Plan, San Bruno Mountain General Plan Amendment, Skyline Area General Plan Amendment and the Colma BART Station Area Plan. Each of these area plans contains land use, development, and housing-related policies that apply to the specific area. The Housing Element has been reviewed for consistency and is consistent with each of these area plans.

Consistency With Airport Land Use Compatibility Criteria

The unincorporated County includes three airports with adopted Airport Land Use Compatibility Plans: San Francisco International Airport, Half Moon Bay Airport, and San Carlos Airport. The Housing Element must be consistent with the Land Use plans adopted for these airports and their surrounding environs, and must be reviewed by the City/County Association of Governments (C/CAG) to confirm compatibility. The draft 2023-2031 Housing Element has been submitted to C/CAG for review.

Consistency with Local Coastal Program

San Mateo County has a coastal zone and an adopted Local Coastal Program (LCP) establishing land use policies for the coastal zone, with implementing zoning and other regulations that constitute the Implementation Plan for the LCP. The Housing Element does not alter any policies or regulations relating to the County's coastal zone, and has been reviewed and determined to be consistent with the LCP and all implementing regulations.