



April 9, 2024

Lisa Ketcham, Chair and Members of the  
San Mateo County Planning Commission  
455 County Center, 2<sup>nd</sup> Floor  
Redwood City, CA 94063

**Re: Item 4 on the April 10, 2024 Agenda: County's 2023-2031 Draft Housing Element Update**

Dear Chair Ketcham and Commissioners,

On behalf of Green Foothills, thank you for the opportunity to comment on the 2023-2031 Draft Housing Element Update.

Regarding Environmental Constraints, the letter from HCD to the County (page 6) includes the following: "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 Housing Element Update, Adequate Sites Inventory, Appendix E, page E-62: includes the rezoning of six parcels in El Granada, Urban Midcoast Area; one parcel is currently designated Medium High Density Residential, the other five are Institutional. Redesignation and rezoning would allow between 60 and 100 units (per acre?) of multifamily residential development by right; environmental review is deferred to future discretionary legislative acts. To address HCD's comment cited above, we recommend an early biological resource survey be conducted on these six parcels in order to determine the presence/extent of wetlands, which has been called to our attention by residents in the past.

Executive Summary (page 6) includes support for development of housing for Farm Laborers and monitoring the quality and safety of Farm Labor Housing sites by:

- **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.**

The San Mateo County Local Coastal Program (Chapter 3 Housing Component) includes the following provisions:

Policy 3.24 Density Bonus for Affordable Housing in Rural Areas calls for 30 dwelling units of affordable housing to be built in the rural areas of the South Coast and 10 dwelling units in the rural areas



of the Midcoast, subject to certain requirements including on-site water and septic systems and other applicable LCP policies; two additional increments of 30 dwelling units in the rural South Coast and 10 in the rural Midcoast are also permitted when the permits for the initial 40 (or 80) have been granted.

These affordable farmworker housing units are also supported by county assistance for qualified non-profit organizations to secure funding and priority for purchasers of the units for BMR loans and/or other housing assistance funding available through the county.

Green Foothills recommends that the updated and expanded farm labor housing strategy referenced in the Executive Summary include current information as to the number, type, and location of units built under LCP Policy 3.24, and whether the units are still in compliance with the affordability deed restrictions. We also note that most farmworker housing programs do not address housing needed for seasonal workers, who are typically single male workers housed in dormitory style “barracks”. Whether, and to what degree, today’s changing farming practices still depend upon this segment of the farm worker labor force, is unclear. Provision for adequate, safe, affordable seasonal housing for seasonal workers should also be assured.

Sincerely,

Lennie Roberts, Legislative Advocate

