

San Mateo County
Farmworker Housing Compliance Task Force
Final Report

Date: February 7, 2025

Executive Summary

In the wake of the mass shooting incident at two farms on the coastside of San Mateo County in January 2023, the County created the Farmworker Housing Compliance Task Force comprised of inspection and compliance personnel from multiple County departments. The Task Force had two goals: (1) proactively identify and locate all farmworker housing on agricultural and ranch lands within the unincorporated area, whether permitted or illegally constructed; and (2) inspect such housing and work with property owners to ensure that all units comply with minimum health and safety standards. This report describes the Task Force's data collection, inspection and compliance process, public engagement efforts, and key learnings about the quantity and condition of employer-provided farmworker housing in the unincorporated area of the County.

Key Findings:

- Through records reviews and surveys, the Task Force identified 124 active agricultural and ranch operations in unincorporated San Mateo County.
- The Task Force determined that of the 124 operations, 56 operations provide farmworker housing.
- Through site inspections of those 56 operations, the Task Force identified 145 farmworker housing units occupied by an estimated 356 farmworkers.
- Most (80%+) farmworker units are comprised of structures intended for permanent dwelling such as manufactured and single-family homes.
- The majority of farmworker units (66%) met minimum health and safety standards, while 50 units (34%) did not meet those standards and required corrective action ranging from minor repairs (e.g., the installation of smoke detectors) to more extensive repairs (e.g., electrical and foundation).

Key Outcomes:

- The Task Force created a first-of-its kind dataset of the 145 farmworker housing units provided by employers in unincorporated areas, including type, condition, and number of farmworker residents.
 - Essential health and safety conditions were improved at 49 farmworker units serving approximately 84 farmworkers, including 63 farmworkers who did not have access to safe drinking water at the time of inspection.
 - One farmworker unit with significant unsafe conditions was yellow tagged and subsequently abandoned as a residence, with the farmworker household relocated to another compliant housing unit.
- Six unregistered operations housing 5+ farmworkers were discovered and referred to the process for registration and compliance with the State's Employee Housing Program, a mandatory program for employers providing housing to five or more employees.
- Dedicated staffing resources have been directed by Planning & Building and Environmental Health Services to assist property owners with legalization and construction of new, compliant farmworker housing.
- Based on its findings, the Task Force recommends a number of potential local actions that can support the legalization, rehabilitation, and permitted construction of farmworker housing, such as creating a Coastal Development Permit exemption for farmworker housing and passing a new ordinance to require small water systems serving farmworker units to submit to regular water testing.

I. Overview

On January 23, 2023, seven farmworkers were killed, and another critically injured in a mass shooting event at two farms on the coastside of San Mateo County. In addition to the loss of life and trauma to the survivors, the horrific tragedy brought to light the substandard housing and unsafe living conditions at the farms where the shootings occurred. The farmworkers had been living in illegally constructed and unpermitted employee housing that building officials later deemed too unsafe for human occupancy.

At the request of District 3 Supervisor Ray Mueller and other County leaders, multiple County departments came together to launch the Farmworker Housing Compliance Task Force in the aftermath of the shooting to ensure safe living conditions for farmworkers residing in employer-provided housing. The Task Force was a joint effort of San Mateo County's Planning and Building Department, Environmental Health Services, County Attorney's Office, and the County Executive's Office, along with input from the County's Department of Agriculture/Weights and Measures.

The Task Force had two primary goals. First, the Task Force set out to identify all farmworker housing units on agricultural and ranch lands in the unincorporated area, whether permitted or unpermitted and regardless of the number of farmworkers housed, as no such comprehensive database existed at the time. Second, through inspections and compliance efforts, the Task Force sought to ensure that all such housing met minimum health and safety standards.

In situations where inspectors found that essential health and safety standards were not met, the Task Force noticed the operators/landowners, provided guidance on all necessary corrections, and specified a timeframe within which the corrections had to be completed.

The Task Force's data-collection and inspection activities are now complete, and this report presents the findings and results of the Task Force's efforts, as well as a set of considerations for continuing efforts to enhance the supply of safe, quality farmworker housing units on agricultural and ranch lands in unincorporated San Mateo County.

II. Outreach to Operators and Data Collection

Prior to the formation of the Task Force, the County generally only had records of farmworker housing that was constructed with proper permitting, was registered under the State's Employee Housing Program, or where the County had received a complaint about living conditions. As a preliminary step, the Task Force thus had to develop an initial data collection process to identify all farmworker housing, whether permitted or not, on agricultural lands throughout the unincorporated county.

To compile a comprehensive list of existing agricultural operations and farmworker housing, the Task Force started conducting outreach in March 2023 to all operations and/or property owners registered or certified with local and state agencies under a range of agricultural programs and permits. Operators received a letter and survey requesting information on the number of farmworker housing units, if any, and the number of workers housed on site. The inspection teams reviewed, analyzed, and confirmed survey responses and contacted property owners and operators to verify the information and schedule consensual onsite inspections.

The survey process allowed the Task Force to build a current and comprehensive database of active agricultural and ranch operations in the unincorporated area, regardless of whether they provide employee housing or not. The Task Force identified a total of 124 operations located in the unincorporated area of the county. The geographic distribution of those operations is shown in Figure 1. Note that while most agricultural and ranch operations in the county are located in unincorporated areas, some operations are located within cities where the County does not exercise the same regulatory and inspection authority. Those operations were not included in the scope of the Task Force's work; however, the Task Force did share information about its procedures and methods with city partners.

Figure 1. Agricultural Operations Subject to Task Force Evaluation



III. Inspection Process

The Task Force conducted onsite inspections at all agricultural and ranch operations providing employee housing. Inspection teams were comprised of representatives from Code Compliance and Environmental Health Services as well as building inspectors to conduct onsite inspections. A representative from the Office of Community Affairs also provided language interpretation and farmworker outreach and support, as needed.

Inspections were conducted of all structures on each property known or suspected to be used to house employees, including residential single-family homes, multi-unit buildings, manufactured/mobile homes, and recreational vehicles, as well as non-traditional residential structures like converted barns. Structures confirmed to be occupied exclusively by the landowner or operator were not generally evaluated by the Task Force absent consent or other site-specific concerns. Before each inspection, the property owner and/or operator was informed of the scope and purpose of the inspection and the composition of the inspection team. In the end, every inspection of the Task Force was conducted with the consent of the property owner and/or operator and the affected tenants.

The inspections were based on conditions observed during the onsite visit and focused on essential health and safety standards related to:

- Septic system: appropriate disposal of sewage and wastewater
- Water supply: access to potable water within safe drinking/quality standards
- Egress/emergency exits: clear and accessible exits from living spaces in the event of an emergency
- Structural safety: adequate and safe construction as observed through visual inspection

- Electrical safety: no apparent hazardous conditions with electrical panel, outlets, wiring, and connections, as observed through visual inspection
- Primary heat source: access to basic heating (not including portable heaters)
- Smoke/carbon monoxide detectors: functional smoke and carbon monoxide detectors installed where required
- Ventilation: appropriate ventilation (particularly for gas appliances)

When the inspection team identified a housing unit that did not meet minimum health and safety standards in these areas, the team provided the operator written documentation of the specific findings and the corrections that would be needed, as well as a timeline by which corrections had to be made. The required timeline for the corrective work varied depending on the risk posed by the condition and the nature of the recommended repair, ranging from immediate (e.g., installation of smoke detectors) to up to 90 days or more (e.g., making structural changes to address emergency egress).

The Task Force aimed to minimize the risk of displacement of farmworkers as much as possible in recognition of the significant disruption such displacement would cause to farmworkers and their families. Accordingly, orders to vacate housing units were only considered where, in the judgment of inspectors, the risks to human life were so great that no one should continue living in the units until the unsafe conditions were remedied. When there was a risk of such displacement, the County worked with the local County Core Service Agency to make ready supports for any displaced individuals and families.

To reduce the risk of displacement, Task Force inspection teams similarly did not condition continued occupancy on full legalization of unpermitted housing units nor otherwise pursue enforcement against owners for failing to obtain or provide proof of applicable permits, so long as any required corrective actions were implemented. However, operators were encouraged to obtain necessary permits to legalize all units and were provided referrals to County Planning and Building and Environmental Health Services staff available to assist with the permitting process.

IV. Communications and Engagement

The Task Force sought to keep the public and stakeholders informed of the Task Force's efforts throughout its work in recognition of public concern regarding the condition of farmworker housing as well as the specific concerns of both farmworkers and operators about the impacts of onsite inspections. In all, the Task Force hosted or presented at thirteen community meetings, including meetings in Half Moon Bay and Pescadero before inspections began. Outreach for those meetings was conducted in partnership with community organizations specifically to reach farmworkers living in the community and was conducted in English, Spanish, and Chinese. In addition, the Task Force created a [public informational](#) website with frequently asked questions.

As inspections began, the Task Force continued to provide updates to the public at community meetings, including a number of presentations to the Farmworker Advisory Commission, one of the County's newest advisory commissions created to promote programs and policies that address the unmet needs of farmworkers in San Mateo County. In the summer of 2023, after receiving feedback about concern and confusion among agricultural operators about the scope of Task Force inspections, the Task Force hosted a series of meetings specifically targeted to operators. As a result of the input received during those meetings, the Task Force created a property owner information sheet that was made available to the public and to each property owner prior to every inspection.

In the summer of 2024, when most of the inspections had been completed, the Task Force hosted and presented at another series of community meetings, during which the Task Force both provided updates about inspection findings as well as presented and sought input on potential reforms and other measures that could be undertaken to support the legal renovation and construction of farmworker housing. Specifically, the Task Force presented at meetings of the Pescadero Municipal Advisory Council, the Agricultural Advisory Council, the Farm Bureau, the Farmworker Advisory Commission, and two additional meetings specifically targeting the farmworker community.

V. Inspection Findings

The Task Force's onsite inspections produced the most comprehensive set of data and information gathered to date on the number, type, and condition of employee housing units provided on agricultural lands.

A. Farmworker Housing by the Numbers

The Task Force counted 56 operators (out of 124 total active operations) that provide farmworker housing on agricultural

or ranch lands in unincorporated San Mateo County. Inspections of each of those operations identified 145 farmworker housing units occupied by an estimated 356 farmworkers. Table 1 shows the regional distribution of farmworker housing by unincorporated area.

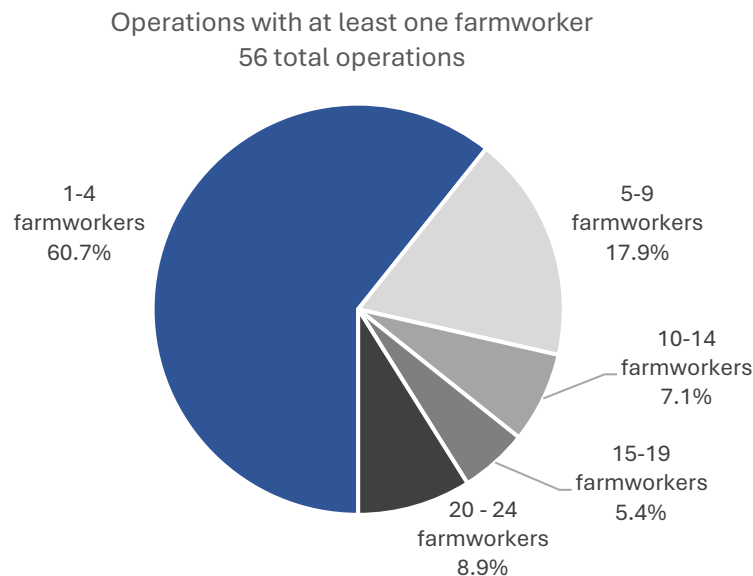
Table 1. Geographic Distribution of Farmworker Housing by Region

Geographic Region	Number of Farmworker Housing Units	Number of Farmworkers
Midcoast	24	49
Unincorporated Half Moon Bay	18	60
San Gregorio	18	38
Pescadero	73	171
Other	12	38
Total	145	356

Of the 56 operations that provide housing to at least one farmworker, 22 operations house five or more farmworkers, and 34 operations house four or fewer farmworkers (see Figure 2 on next page). The number of farmworkers who live on site is relevant because operations housing five or more farmworkers are regulated under the State’s Employee Housing Act, which governs the construction standards, maintenance, and use of private employee housing facilities to assure the health, safety, and general welfare of the tenants. Under the Employee Housing Act, operators are subject to annual inspections by County Environmental Health Service’s Employee Housing Program.

Through the Task Force’s inspections, the County identified six operations that house five or more employees but were not enrolled in the Employee Housing Program at the time of inspection. In addition to having to complete any necessary corrections identified by the Task Force, those operators were referred to the process to legalize their units, apply for an employee housing permit, and otherwise comply with all requirements of the State Employee Housing Program, including being subject to annual health and safety inspection.

Figure 2. Farmworker Occupancy by Property

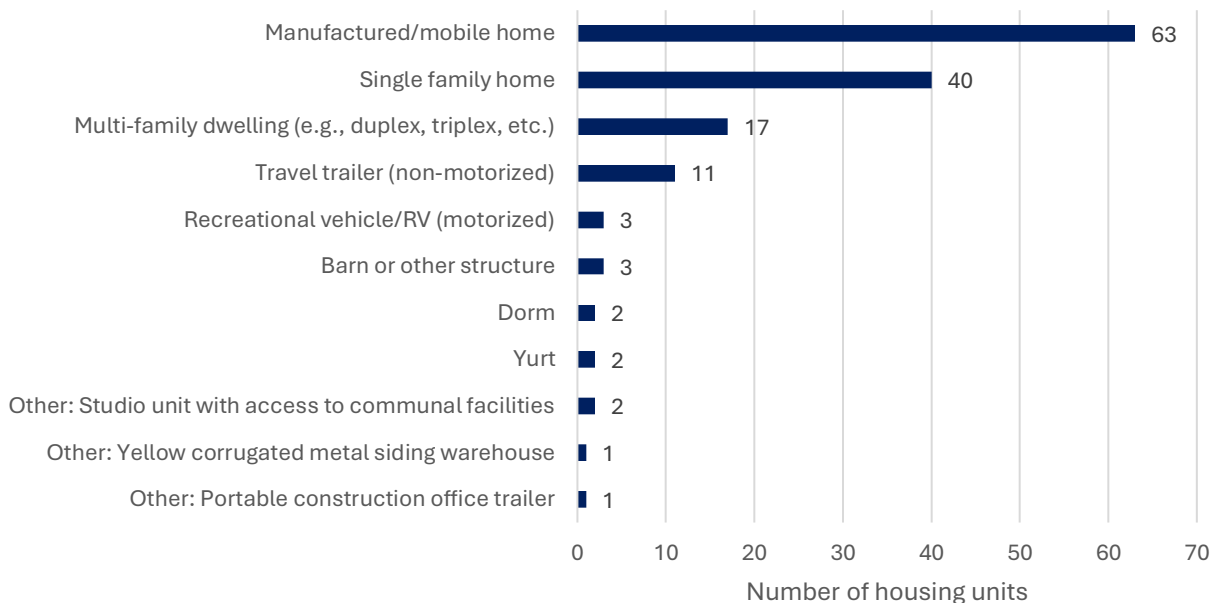


B. Farmworker Housing by Type

While the Task Force inspected a wide range of housing unit types, the vast majority of the 145 farmworker housing units were structures intended to be permanent dwellings like manufactured/mobile homes, single-family homes, multi-family dwellings (e.g., duplex, triplex, etc.), and dormitories. The remainder was comprised of other types of structures such as converted barns, travel trailers (non-motorized), and recreational vehicles (RVs). Figure 3 shows the breakdown of farmworker housing unit type as identified by the Task Force.

In addition to farmworker housing units, inspection teams also inspected 32 vacant units and 12 units housing non-farmworker tenants. Data for those units can be found in Appendix A.

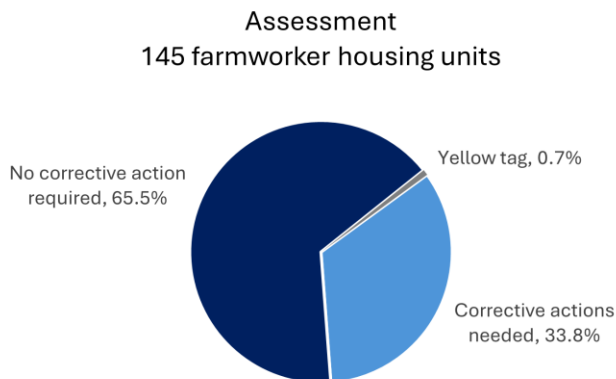
Figure 3. Farmworker Housing Structure Type (145 Total Units)



C. Corrective Actions by the Numbers

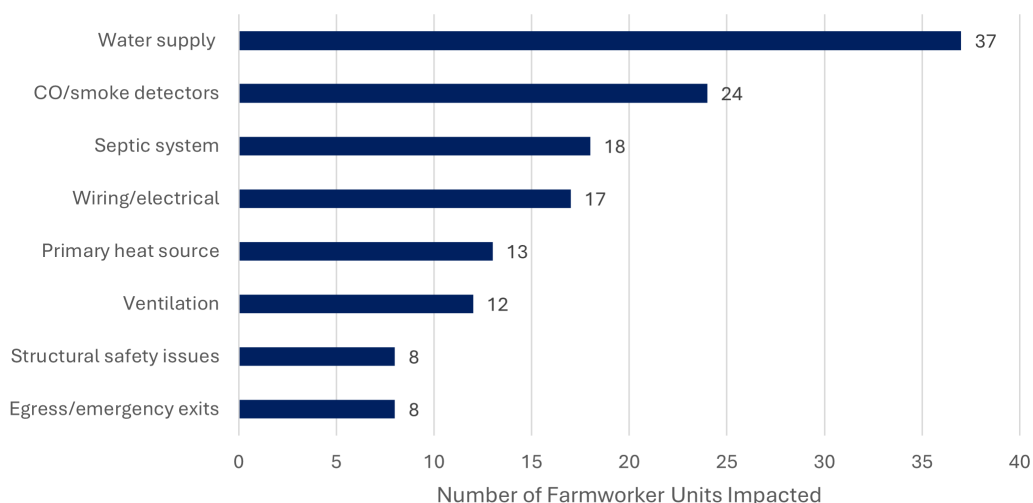
The Task Force evaluated farmworker housing units for compliance with essential life, health, and safety standards, as described in Section III, above. Of the 145 farmworker housing units inspected, 65.5% (95 units) met the Task Force’s safety standards, and 33.8% (49 units) required corrective actions but could remain occupied. One farmworker housing unit (0.7%) required such extensive corrective work that it was deemed imminently dangerous and was accordingly yellow tagged, meaning that residents could not continue to reside there unless the dangerous conditions were addressed. The operator in that case abandoned the unit rather than undertake corrective actions but relocated the farmworker household to another, compliant housing unit on the property.

Figure 4. Inspection Findings



Of the farmworker units requiring corrective action, the most frequently cited issues related to water supply (37 units), lack of CO/smoke detectors (24 units), septic system concerns (18 units), and wiring/electrical concerns (17 units) (note that a unit of housing may have required corrections in multiple categories). Figure 5 shows the frequency of all evaluation categories.

Figure 5. Safety Evaluation Findings by Category



With respect to water supply issues, in addition to evaluating any plumbing or connection issues with the water service to farmworker units, the Task Force also tested water samples for the presence of bacteria whenever the water source serving farmworker units was not already subject to regular testing and reporting under an applicable water permit. Through such testing, the Task Force identified water systems on properties serving an estimated 35 farmworker units that tested positive for coliform and/or *E. coli* bacteria, which pose a primary public health threat to the water users. In those cases, inspectors required operators to provide disinfection, make repairs, or install more permanent treatment of the water to eliminate any ongoing threat from bacteria in the water supply. Where appropriate, inspectors issued boil-water notices until mitigation or correction was completed.

Regarding the safety of the housing structures, the required corrective actions ranged from minor to more extensive. Examples of minor corrective actions include the installation of smoke and carbon monoxide alarms and the proper venting of appliances such as water heaters and stoves. Examples of more extensive corrective actions include the installation or modification of doors or windows in rooms used for sleeping to provide secondary emergency egress, electrical repairs, foundation repairs, and the installation or replacement of heating systems.

Through these compliance efforts, the Task Force ensured that property owners and operators undertook appropriate repairs for each of the 49 farmworker units identified by inspection as requiring corrective action.

VI. Conclusion and Recommendations

The Task Force's work to identify and inspect all farmworker housing on agricultural and ranch lands in unincorporated San Mateo County is the first effort of its kind at the county level. The data and the findings in this report paint the most comprehensive and accurate picture to date of the locations, quantity, and condition of farmworker housing on agricultural lands. The Task Force's goals from its inception were to not only ensure minimum habitability conditions for all farmworker housing units, but also to provide information and insight about the state of employee housing for farmworkers that can help inform current and future efforts to support the construction and maintenance of safe and healthy farmworker housing in San Mateo County. (For more information on other recent efforts undertaken by the County of San Mateo and other agencies to address the unmet needs of farmworkers, see Appendix B.)

With respect to possible future actions of the County along these lines, the Task Force offers the following recommendations based on its findings as well as input gathered through public engagement and community meetings:

1. Increase compliance measures for safe drinking water.

Although inspections showed that most farmworker units already complied with essential health and safety standards at the time of inspection, one area in which additional compliance measures could be impactful is with respect to the regulation of water systems, specifically those serving fewer than five service connections and therefore not currently subject to existing water quality monitoring or oversight under State law. The Task Force recommends exploration of a local ordinance that would require minimum construction standards, an annual operating permit, and periodic sampling to confirm minimum water quality standards for such water

systems serving farmworker housing units.

2. Support the legalization of existing units and legal construction of new units.

The Task Force believes that legalization of all existing farmworker units (and legal construction of all new units) is *the most effective* way to ensure that farmworker units are constructed safely, are designed to the durability standards of permanent dwellings, and are built to protect and support healthy conditions for farmworker residents, the community, and the surrounding environment. The legal construction and rehabilitation of housing of any type in the unincorporated coastsides of San Mateo County, however, must navigate a number of legal, regulatory, and geographic constraints that do not exist for many bayside communities. While many of the legal and regulatory requirements are governed by State law and cannot be changed at the local level, the Task Force has identified potential measures at the local level that can facilitate the more efficient and expeditious construction and/or renovation of farmworker units.

In particular, **potential legal changes** include: (1) reducing minimum size requirements for onsite wastewater treatment systems (OWTS), such as septic, that would allow a lower threshold for determining the minimum size of the system to more accurately reflect the actual demand presented by a proposed farmworker housing unit; and (2) pursuing an amendment to the Local Coastal Program that would establish a Coastal Development Permit exemption for farmworker employee housing projects in areas that will not impact coastal resources, as necessary to comply with the Coastal Act requirements (e.g., outside of sensitive habitat areas and their buffers, not visible from scenic roads, and not on prime soils where feasible).

Additionally, **process changes** to better assist property owners and operators who seek to build, renovate or repair farmworker employee housing include the following efforts already under way: (1) updates to the County's one-stop reference manual, the Farm Labor Housing Guidebook, to provide a comprehensive and current description of permit requirements and procedures, along with detailed instructions on how to obtain assistance with the permit process from the departments of Planning & Building and Environmental Health Services; and (2) the addition of dedicated staff resources to both Planning and Building and Environmental Health Services to assist property owners with the permit and approval process, including water system and OWTS evaluation, and construction reviews for installations, upgrades, and repairs.

3. Explore financial support for the construction and rehabilitation of farmworker units.

To address the potential financial obstacles to legal construction or rehabilitation of existing units for some operators, the Task Force recommends exploring a potential refresh of the Farmworker Housing Loan Program operated by the Department of Housing. That program, which to date has provided eight subsidized loans to develop and rehabilitate 16 farmworker housing units, has no remaining funds for additional loans at the time of this report.

VII. Resources and Information

For information about how to construct and rehabilitate legal farmworker housing, including the updated Farm Labor Housing Guidebook, as well as information about any new measures in this area that may be adopted by the County, visit the County's [Farm Labor Housing Permit](#) webpage.

The County remains committed to ensuring safe living conditions for farmworkers residing in employer-provided housing and encourages tenants and other concerned stakeholders with reportable information about unsafe housing conditions to make a report using the following methods:

1. To report matters regarding unsafe housing structures, contact the Planning & Building Department at (650) 363-7821.
2. To report matters regarding health, water, and sanitation, contact Environmental Services at (650) 363-4404 and/or FarmWorkerHousingSupport@smcgov.org.

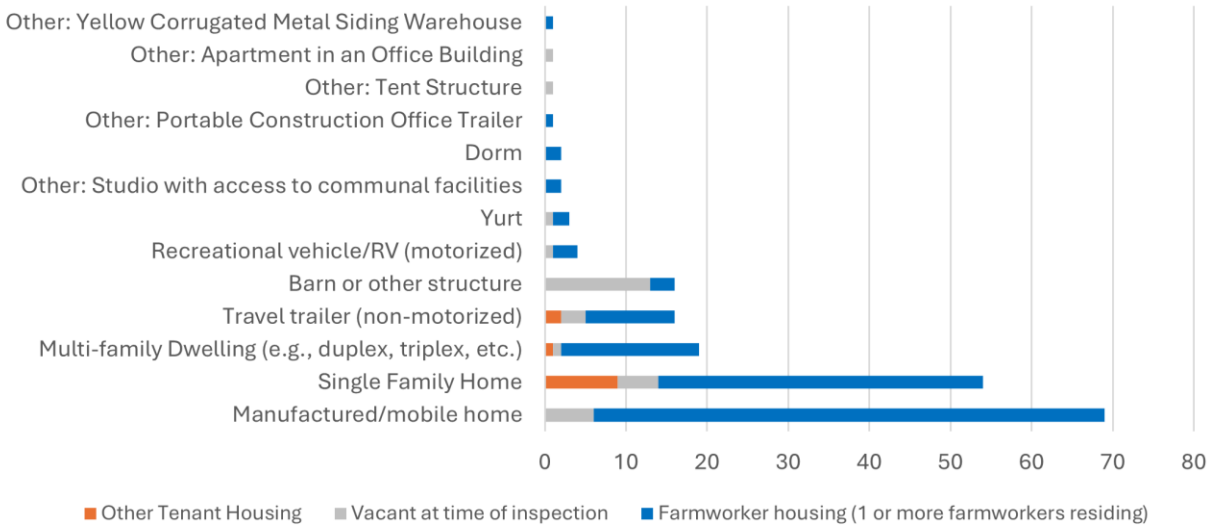
In the coming months, the Office of Community Affairs will conduct targeted outreach to the farmworker community and other stakeholders to provide information on how to report unsafe conditions.

Appendix A. Inspection Data

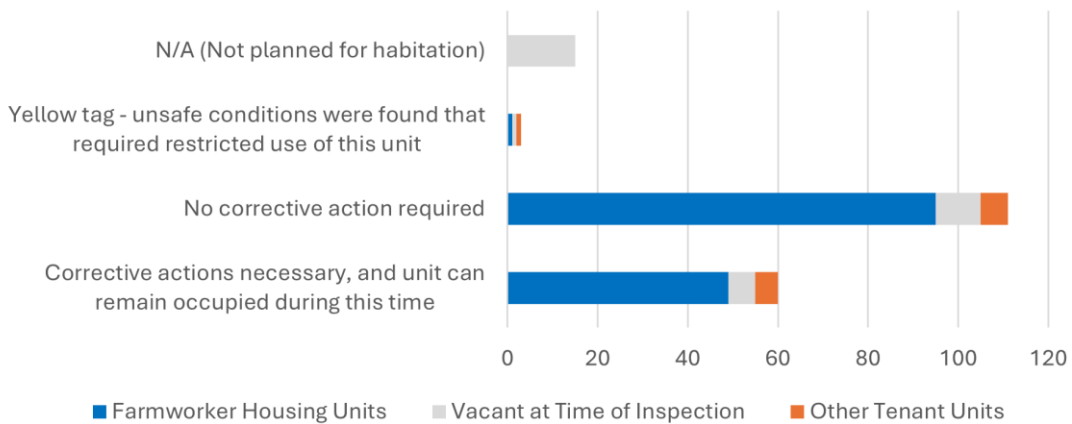
This appendix features data for all units inspected, including non-farmworker units. The three categories of occupancy featured include:

- “Farmworker housing” refers to a housing unit with one or more farmworker employees
- “Other tenant units” refers to housing units with tenants who were not identified as employees, including renters and guests
- “Vacant” refers to housing units that were vacant at time of inspection

Type of Structures by Occupancy Category
189 total units



Task Force Assessment by Occupancy Category
189 total units



Task Force Assessment by Occupancy Category

Task Force Assessment	Farmworker Housing Units	Vacant at Time of Inspection	Other Tenant Units	Total Units	Percent of Total Units
Corrective actions necessary, and unit can remain occupied during this time	49	6	5	60	31.7%
No corrective action required	95	10	6	111	58.7%
Yellow tag - unsafe conditions were found that required restricted use of this unit	1	1	1	3	1.6%
N/A (Not planned for habitation)		15		15	7.9%
Total	145	32	12	189	100%

Type of Correction Needed by Occupancy Category

Type of Correction Needed	Farmworker Units	Vacant Unit at Time of Inspection	Other Tenant Units	Total Units
Septic system	18	4	3	25
Water supply	37	3	3	43
Wiring/electrical	17	2	4	23
Egress/emergency exits	8	1	0	9
Structural safety issues	8	3	1	12
Primary heat source	13	2	3	18
CO/smoke detectors	24	1	5	30
Ventilation	12	1	2	15

Appendix B. Other Initiatives

I. Recent Affordable Housing Projects

Stone Pine Cove (880 Stone Pine), Half Moon Bay

The County has been working on a long-term housing development called 880 Stone Pine Road in Half Moon Bay, an affordable manufactured home community developed in partnership with the City of Half Moon Bay offering ownership opportunities for 47 farmworker households, including those specifically displaced by the mass shooting of January 2023. The County is considering providing homeownership opportunities to agricultural workers making up to 80% of the area median income and will target extremely low-income households and displaced households from dilapidated housing conditions. The County anticipates occupancy to begin in Spring 2025. For more information, please visit the City of Half Moon Bay's [Stone Pine Cove – Affordable Housing](#) webpage.

Cypress Point, Moss Beach

Affordable housing developer MidPen Housing is developing a 71-unit affordable housing community in Moss Beach. The project will consist of 16 one-bedroom, 37 two-bedroom, and 18 three-bedroom homes that are anticipated to serve approximately 210 residents. All units, apart from the manager's unit, will be rented to households that earn less than 60% of the area median income, of which 18 are reserved for low-income farmworker households. For more information, please visit the County of San Mateo's [Cypress Point Affordable Housing Community Project](#) webpage.

555 Kelly Avenue, Half Moon Bay

In partnership with ALAS (Ayudando Latinos a Sonar) and with financial support from the County, affordable housing developer Mercy Housing California (MHC) is slated to build 40 apartments of affordable housing for senior farmworkers on a parcel owned by the City of Half Moon Bay. The property will also be the future home of the Farmworker Resource Center, a new community center operated by ALAS. For more information, please visit the City of Half Moon Bay's [555 Kelly Avenue – Affordable Housing](#) webpage.

II. Pescadero Housing Site Analysis

The County is conducting an analysis of sites within the Pescadero area to determine if there are properties that are suitable for the development of affordable housing. This assessment will include an in-depth study of sites that may be viable for this purpose, and identify potential barriers to such development posed by existing policies and regulations that could be amended to facilitate the development of farmworker housing in the area.

III. Office of Labor Standards and Enforcement (OLSE)

In December 2023, the Board of Supervisors voted unanimously to launch an Office of Labor Standards and Enforcement (OLSE) with specific attention to low-income workers and workers from vulnerable populations. The goal is to inform workers and employers about labor rights and increase adherence to wage per hour laws through increased awareness and enforcement. The OLSE will aim to strengthen worker protections by having in-house support to reinforce regional, state, and federal regulatory and educational strategies. The OLSE is currently in development, utilizing a phased approach to design and establish needed infrastructure.