

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

DATE: April 8, 2026

TO: Planning Commission

FROM: Planning Staff

SUBJECT: Adoption of an amended 2023-2031 San Mateo County Housing Element of the General Plan

PROPOSAL

A resolution adopting a General Plan amendment to repeal the 2023-2031 San Mateo County Housing Element of the General Plan and adopt the amended 2023-2031 San Mateo County Housing Element of the General Plan, in compliance with State law, to amend the Rezoning Program, Program HE 11.2 of the Housing Element, in order to increase proposed maximum residential densities in the portions of the Rezoning Program outside of the County's Coastal Zone, and to make various minor amendments throughout the Housing Element consistent with changes to the Rezoning Program.

RECOMMENDATION

Recommend that the Planning Commission recommends the County Board of Supervisors to adopt a resolution adopting a General Plan amendment to repeal the 2023-2031 San Mateo County Housing Element of the General Plan and adopt the amended 2023-2031 San Mateo County Housing Element of the General Plan, in compliance with State law.

BACKGROUND

Report Prepared By: Will Gibson

Public Notification: A notice of the hearing was posted in the San Mateo County Times 10 days prior to the hearing date

Location: Countywide

DISCUSSION

A. KEY ISSUES

1. The Housing Element

The Housing Element is a required element of the County's General Plan, mandated by State law. State law establishes the required contents of the Housing Element and establishes the schedule and process for updating the Housing Element.

The Housing Element must be updated every eight years, and must include: identification of existing and projected housing needs for all segments of the community; goals, policies, and programs to address housing needs; an assessment of constraints on the development of housing; assessment of how the County's housing policies and programs and identified sites for development affirmatively further fair housing (AFFH); and an evaluation of the existing Housing Element.

Crucially, the Housing Element must also include an identification of sufficient developable or redevelopable sites to meet the County's fair share of regional housing needs at all income levels over the next 8 years. The County's share of housing need is its "Regional Housing Needs Allocation" (RHNA), established by the Bay Area Metropolitan Transportation Commission. If the County does not demonstrate sufficient capacity from existing sites to meet its RHNA, both in total and by income category, it must commit to rezone an adequate number of identified sites to address the shortfall.

The County's amended Housing Element must also be submitted to the California Department of Housing and Community Development (HCD) for review and for a determination of consistency with State law. Until HCD has determined the Housing Element's consistency, the Housing Element is not considered compliant with State law.

The County's RHNA and existing development capacity is shown below:

Income Category	RHNA	Development Capacity	Surplus/ (Deficit)
<i>Very Low</i>	811	457	(354)
<i>Low</i>	468	356	(112)
<i>Moderate</i>	433	254	(179)
<i>Above Moderate</i>	1,121	802	(319)
Total	2,833	1,869	(964)

As the table shows, the County was unable to identify sufficient sites to meet its RHNA without rezoning. To address this shortfall, Program HE 11.2 in the adopted Housing Element identified proposed sites for rezoning. The capacity of those sites is shown below.

Income Category	RHNA	Total Units	Original Surplus/ (Deficit)	Units with Rezoning	Surplus/ (Deficit) w/ Rezoning
<i>Very Low</i>	811	457	(354)	914	103
<i>Low</i>	468	356	(112)	680	212
<i>Moderate</i>	433	254	(179)	89	156
<i>Above Moderate</i>	1,121	802	(319)	1228	107
Total	2,833	1,869	(964)	3,411	578

The County’s Housing Element was adopted by the County Board of Supervisors in March 2025 and was determined by HCD to be consistent with State law. However, because the Housing Element was not adopted prior to the deadline in State law, HCD will not deem the Housing Element fully compliant until rezoning of the sites identified in the Rezoning Program is complete. Since adoption of the Housing Element last March, work on the Rezoning Program has been underway.

2. Housing Element Rezoning Program

Since adoption of the Housing Element, the County and HCD have sought to identify ways to speed up completion of the Rezoning Program, and more rapidly achieve full compliance with State law. Critically, while the majority of sites in the Rezoning Program are located outside of the County’s Coastal Zone, in the Harbor Industrial, Broadmoor, and unincorporated Colma areas, five sites are within the County’s Coastal Zone, in the El Granada area. Because sites in the County’s Coastal Zone require significantly more environmental review, and because rezoning within the Coastal Zone must be submitted for an entirely separate approval process with the California Coastal Commission, rezoning the Coastal sites is a much longer and less predictable process than for sites outside the Coastal Zone, which can be rezoned solely on the authority of the Board of Supervisors.

On the basis of discussion with HCD, the County now proposes raising the maximum residential densities on the rezoning sites outside of the Coastal Zone, from the current 120 units/acre to 150 units/acre. This density would address the County’s unmet RHNA solely relying on the non-Coastal sites, although without the buffer above the RHNA that is typically required for full

compliance with State law. This amendment to the Rezoning Program would:

- a. Allow the County to adopt zoning and associated General Plan amendments implementing the non-Coastal portions of the Rezoning Program on an expedited timeline;
- b. Upon adoption, submit the adopted implementing amendments to HCD, with the goal of obtaining conditional certification of the Housing Element as compliant with State law; and
- c. The County would continue to assess the developability of the Rezoning Program parcels in the Coastal Zone, but in the interim, the County's Housing Element would be in compliance with State law.

To this end, the proposed amendments to the Housing Element raise maximum residential densities for all non-Coastal Rezoning Program sites to 150 units per acre. This would include an amendment to the Rezoning Program itself, and various minor amendments throughout the Housing Element to appropriately modify tables and references to the Rezoning Program. The County's RHNA and development and redevelopment capacity with the proposed amendment is shown below, with and without the Coastal sites.

RHNA vs Development Capacity, Total

Income Category	RHNA	Total Units	Original Surplus/ (Deficit)	Units with Rezoning	Surplus/ (Deficit) w/ Rezoning
<i>Very Low</i>	811	457	(354)	1035	224
<i>Low</i>	468	356	(112)	778	310
<i>Moderate</i>	433	254	(179)	690	257
<i>Above Moderate</i>	1,121	802	(319)	1341	220
Total	2,833	1,869	(964)	3,844	1,011

RHNA vs Development Capacity, without Coastal Sites

Income Category	RHNA	Total Units	Original Surplus/ (Deficit)	Units with Rezoning	Surplus/ (Deficit) w/ Rezoning
<i>Very Low</i>	811	457	(354)	834	23
<i>Low</i>	468	356	(112)	619	151
<i>Moderate</i>	433	254	(179)	529	96
<i>Above Moderate</i>	1,121	802	(319)	1153	32
Total	2,833	1,869	(964)	3,135	302

The proposed amendments were circulated for public review from March 11, 2026 to March 19, 2026, and were subsequently submitted to HCD for review on March 20, 2026. On March 30, 2026, HCD transmitted a letter determining that the proposed amendments, on adoption by the Board of Supervisors, would be consistent with State law. HCD’s letter is included as Attachment C. The updated Housing Element, with amendments indicated in redlined text, is available here:

[https://www.smcgov.org/media/158438/download?inline=.](https://www.smcgov.org/media/158438/download?inline=)

B. ALTERNATIVES

The alternatives to the Planning Commission recommending that the Board of Supervisors adopt a resolution replacing the adopted County Housing Element is a recommendation that the Board not adopt the resolution or making no recommendation.

C. ENVIRONMENTAL REVIEW

Adoption of the updated Housing Element is a project requiring environmental review under the California Environmental Quality Act (CEQA). The County adopted an Initial Study and Negative Declaration for the Housing Element, in compliance with CEQA. 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 may require additional environmental review, which would take place as those programs are implemented. The Initial Study

<https://www.smcgov.org/media/143637/download?attachment> and Negative Declaration <https://www.smcgov.org/media/143638/download?attachment> were circulated for public review between May 3 and June 9, 2023. Subsequent amendments to the Housing Element have not added any programs or actions that have environmental impacts absent further action that would require

independent review for compliance with CEQA, and do not alter the scope or determination of the Initial Study and Negative Declaration, and no additional environmental review is required.

D. REVIEWING AGENCIES

County Attorney's Office

ATTACHMENTS

- A. Recommendation
- B. Resolution repealing and replacing the adopted 2023-2031 Housing Element of the General Plan
- C. HCD Housing Element review letter

County of San Mateo
Planning and Building Department

RECOMMENDATION

Permit or Project File Number: N/A

Hearing Date: April 8, 2026

Prepared By: Will Gibson

For Adoption By: Planning Commission

RECOMMENDATION

That the Planning Commission recommend that the County Board of Supervisors adopt a resolution adopting a General Plan amendment to repeal the 2023-2031 San Mateo County Housing Element of the General Plan and adopt the amended 2023-2031 San Mateo County Housing Element of the General Plan, in compliance with State law.



COUNTY OF SAN MATEO - PLANNING AND BUILDING DEPARTMENT

ATTACHMENT B

RESOLUTION NO. _____

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

*** * * * ***

RESOLUTION ADOPTING A GENERAL PLAN AMENDMENT TO REPEAL THE 2023-2031 SAN MATEO COUNTY HOUSING ELEMENT OF THE GENERAL PLAN AND ADOPT THE AMENDED 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 requesting changes to the Housing Element to comply with State law; 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, on April 24, 2024 the San Mateo County Board of Supervisors adopted an amended Housing Element and submitted the adopted Housing Element to HCD for further review for compliance with State law; and

WHEREAS, after review, HCD responded with a letter asserting that upon adoption, the amended Housing Element would be consistent with State law; and

WHEREAS, the adopted Housing Element contains a Rezoning Program, Program HE 11.2, which identifies a number of sites for rezoning to higher residential densities, in order to meet the County's shortage of available sites for residential development in order to meet the County's quantified housing need over the 2023-2031 period of the Housing Element cycle; and

WHEREAS, the County now desires to further amend the Rezoning Program of the Housing Element, Program 11.2, to raise the maximum residential densities allowed on identified rezoning sites in the unincorporated areas of Broadmoor, the Harbor Industrial Area, and unincorporated Colma, in order to address the County's housing needs and more rapidly comply with State law; and;

WHEREAS, the proposed amendments have been circulated for public review from March 11, 2026 to March 19, 2026 as required by Government Code Section 65585(b)(1)(A); and

WHEREAS, after public review, the proposed amendments were submitted to HCD for review of compliance with State law; and

WHEREAS, after review, HCD responded with a letter asserting that upon adoption, the amended Housing Element would be consistent with and deemed approved per State law; and

WHEREAS, the amended 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 amended 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; and

WHEREAS, the County prepared an Initial Study and Negative Declaration for the Housing Element, in compliance with CEQA; and

WHEREAS, 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 would result in no potential environmental impacts; and

WHEREAS, on April 24, 2024, the Board of Supervisors adopted the Negative Declaration; and

WHEREAS, subsequent amendments to the Housing Element have not added any programs or actions that have environmental impacts absent further action that would require independent review for compliance with CEQA, and the subsequent amendments do not alter the scope or determination of the Initial Study and Negative Declaration, and no additional environmental review is required; and

WHEREAS, on (DATE TBD) this 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 Board memorandum, and all attachments, and oral and written public comments; and

NOW, THEREFORE, IT IS HEREBY DETERMINED AND ORDERED that this

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 several 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 2026.
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 site conditions and characteristics, comparable recently 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, as demonstrated in detail in Appendix E of the Housing Element, 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 such sites 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 HCD's various letters to San Mateo County throughout the Housing Element update and adoption process, including the most recent letter dated (DATE TBD), consistent with Government Code Section 65585(f), and as described in Attachment C to the Board memorandum accompanying this resolution, incorporated herein, the Housing Element is consistent with the findings of HCD and substantially complies with the requirements of State Housing Element Law as interpreted by State Department of Housing and Community Development.

8. The 2023-2031 San Mateo County Housing Element of the General Plan is hereby repealed in its entirety, and the amended 2023-2031 Housing Element, attached as Exhibit A to this resolution, and incorporated herein by reference, is adopted.
9. This resolution shall become effective upon adoption by the Board of Supervisors.
10. The Director of Planning and Building is hereby authorized to complete further technical or clerical revisions to the Housing Element as may be necessary to achieve obtain a finding of substantial compliance from the Department of Housing and Community Development.
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 C

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

651 Bannon Street, Suite 400
Sacramento, CA 95811
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov



March 30, 2026

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 Amendment to the Housing Element

Thank you for submitting the County of San Mateo's (County) draft amendment to the housing element that was received for review on March 19, 2026. Pursuant to Government Code section 65585, the California Department of Housing and Community Development (HCD) is reporting the results of its review.

On March 7, 2025, HCD found the County's revised draft housing element met the statutory requirements of State Housing Element Law (Gov. Code, § 65580 et seq.). However, the housing element could not be found in substantial compliance until the County had completed necessary rezones (See Below). This draft amendment does not impact the March 7, 2025 finding that the housing element meets statutory requirements. The housing element will comply with State Housing Element Law when rezoning is complete and the element is re-adopted, submitted to, and approved by HCD, in accordance with Government Code section 65585.

A jurisdiction that did not adopt a compliant housing element within 120 days from the statutory deadline must rezone sites within one year of the statutory deadline and meet requirements pursuant to Government Code sections 65583, subdivision (c)(1)(A) and 65583.2, subdivisions (c), (h) and (i). As this year has passed and rezoning has not been completed, the housing element is out of compliance and will remain out of compliance until the rezoning have been completed. Once the County completes the rezone, a copy of the resolution or ordinance should be transmitted to HCD. HCD will review the documentation and issue correspondence identifying the updated status of the County housing element compliance.

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 expeditiously move forward with rezoning and adopt and submit to HCD to regain housing element compliance.

For your information, since the element relies on nonvacant sites to accommodate 50 percent or more of the lower-income Regional Housing Needs Allocation (RHNA), requirements are triggered to make findings based on substantial evidence (as part of adoption by resolution) that the existing use is not an impediment and will likely discontinue in the planning period pursuant to Government Code section 65583.2, subdivision (g)(2).

Pursuant to Government Code section 65583.3, subdivision (b), the County must utilize standards, forms, and definitions adopted by HCD when preparing the sites inventory and submit an electronic version of the sites inventory. While the County has submitted an electronic version of the sites inventory, if changes occur or have occurred since submittal, any future adopted version of the element must also submit the electronic version of the sites inventory.

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.

Pursuant to Government Code section 65583.3, subdivision (b), the County must utilize standards, forms, and definitions adopted by HCD when preparing the sites inventory and submit an electronic version of the sites inventory. While the County has submitted an electronic version of the sites inventory, given the changes, any future re-adopted versions of the element must also submit the electronic version of the sites inventory to sitesinventory@hcd.ca.gov.

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 Affordable Housing and Sustainable Communities program, 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.

Steve Monowitz, Director
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HCD appreciates the County's hard work and diligence during the housing element process and looks forward to receiving the re-adopted element. If you have any questions or need additional technical assistance, please contact Anthony Errichetto, of our staff, at Anthony.Errichetto@hcd.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Paul McDougall". The signature is stylized and cursive.

Paul McDougall
Senior Program Manager