

RESOLUTION NO. 2023 - __

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SAN BRUNO ADOPTING A GENERAL PLAN AMENDMENT TO POLICY HS-40, AND ADOPTING A GENERAL PLAN AMENDMENT TO UPDATE THE HOUSING ELEMENT OF THE GENERAL PLAN FOR THE PERIOD 2023-2031, REPLACING THE 2015-2023 HOUSING ELEMENT, WITH FINDINGS OF SUBSTANTIAL COMPLIANCE WITH STATE HOUSING ELEMENT LAW, PURSUANT TO GOVERNMENT CODE SECTION 65585, AND AUTHORIZING STAFF TO SUBMIT THE HOUSING ELEMENT UPDATE TO THE CALIFORNIA DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT FOR REVIEW AND CERTIFICATION

WHEREAS, the California legislature has found 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.” (Gov. Code Section 65589.5.); and

WHEREAS, the legislature has further found that “Among the consequences of those actions are discrimination against low-income and minority households, lack of housing to support employment growth, imbalance in jobs and housing, reduced mobility, urban sprawl, excessive commuting, and air quality deterioration.” (Gov. Code Section 65589.5.); and

WHEREAS, the legislature adopted the Housing Crisis Act of 2019 (SB 330) which states that “In 2018, California ranked 49th out of the 50 states in housing units per capita... California needs an estimated 180,000 additional homes annually to keep up with population growth, and the Governor has called for 3.5 million new homes to be built over 7 years”; and

WHEREAS, State Housing Element Law (Government Code Sections 65580 et seq.) requires that the City Council adopt a Housing Element for the eight-year period 2023-2031 to accommodate the City of San Bruno’s (City) regional housing need allocation (RHNA) of 3,165 housing units, comprised of 704 very-low-income units, 405 low-income units, 573 moderate-income units, and 1,483 above moderate-income units; and

WHEREAS, State law requires that the City take meaningful steps to promote and affirmatively further fair housing (Gov. Code Section 65583(c)(5)); and

WHEREAS, State law requires that the City make zoning available for all types of housing, including multifamily housing (Gov. Code Sections 65583.2 and 65583(c)); and

WHEREAS, the proposed 2023-2031 Housing Element will replace the existing 2015-2023 Housing Element and serve as the City of San Bruno's guiding policy document for meeting the City's future housing needs at all economic levels; and

WHEREAS, as provided in Government Code Sections 65352 – 65352.5 San Bruno referred the Housing Element to all California Native American tribes on the contact list provided by the Native American Heritage Commission and to other entities listed; and

WHEREAS, no California Native American tribe requested consultation; and

WHEREAS, the preparation, adoption, and implementation of the Housing Element requires a diligent effort to include all economic segments of the community; and

WHEREAS, the City conducted extensive community outreach over the last 24 months, including public meetings before the Planning Commission and City Council; and

WHEREAS, on May 24, 2022, the first draft of the Housing Element was published on the City's website and made available for a 30-day public review period that closed on June 24, 2022, and the city considered public comments on the draft during a 10-day review period after the close of the comment period before submittal to the State Department of Housing and Community Development (HCD) for its review; and

WHEREAS, on July 8, 2022, the City submitted the draft Housing Element to the State Department of Housing and Community Development (HCD) for its 90-day review; and

WHEREAS, in September 2022, City staff contacted HCD to discuss preliminary feedback regarding the adequacy of the draft Housing Element, and based upon this conversation, City staff revised the draft Housing Element to include additional information and data; and

WHEREAS, on October 6, 2022, the City received a letter from HCD stating that the revised draft Housing Element was not in compliance with State Housing Element Law, and further changes were needed to bring it into compliance with State Housing Element Law before it is certified by HCD in accordance with Government Code Section 65585; and

WHEREAS, the City has considered the comments in HCD's October 6, 2022 letter, and has made revisions to the draft Housing Element to address those comments; and,

WHEREAS, on December 30, 2022, the City published a revised draft Housing Element responding to HCD's findings and requested public comment on the draft; and

WHEREAS, on January 12, 2023, the Planning Commission conducted a duly noticed public hearing, reviewed the proposed 2023-2031 Housing Element, which includes revisions to address HCD's review comments, and all pertinent maps, documents, and exhibits, including the comments made by HCD and public comments, and adopted Resolution No. 2023-02 recommending that the City Council adopt the document with certain recommended revisions, and forward it to HCD for review and certification; and

WHEREAS, on that same date, the Planning Commission reviewed a companion amendment to Policy HS-40 in the General Plan and adopted Resolution No. 2023-02 recommending that the City Council adopt the amendment; and

WHEREAS, on that same date, the Planning Commission considered the Initial Study and Draft Mitigated Negative Declaration, public comments and responses, the application of all mitigation measures and a proposed Mitigation Monitoring and Reporting Program prepared for the 2023-2031 Housing Element update pursuant to the California Environmental Quality Act, and adopted Resolution No. 2023-01 recommending that the City Council adopt the Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program; and

WHEREAS, a Notice of Public Hearing for the 2023-2031 Housing Element Update was duly posted in the *San Mateo Daily Journal* on Saturday, January 14, 2023; and

WHEREAS, on January 24, 2023, the City Council conducted a duly noticed public hearing to consider the Housing Element update, amendment of General Plan Policy HS-40, and the Initial Study/ Mitigated Negative Declaration and related CEQA review documentation; and

WHEREAS, the City Council adopted Resolution No. 2023-____, which is hereby incorporated by reference, finding, among other things, that the proposed Housing Element will not result in a significant effect upon the environment because the mitigation measures described in the MMRP have been added to the Project, and adopting the Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program.

NOW, THEREFORE, BE IT RESOLVED that the City Council of the City of San Bruno, based on substantial evidence in the staff reports, written and oral testimony, and exhibits presented, hereby finds as follows:

1. The foregoing recitals are true and correct and are incorporated by reference into this action
2. The proposed General Plan Housing Element text and diagram amendment are consistent with the policies and intent of the General Plan. The proposed Housing Element amendment to the General Plan clarify and improve existing Housing Element policies and objectives and

ensure internal consistency between the Housing Element and the Health and Safety Element. Further, the Housing Element amendment ensures consistency between the city's General Plan and State law, and which achieve General Plan policies and objectives for equal access to housing, access to transportation improvement funds, and mixed use, transit-oriented housing opportunities.

3. The proposed General Plan Housing Element amendment is in response to the requirements of the California Government Code to update the Housing Element every eight years. Adoption of an updated Housing Element is critical to address various requirements of State law and certification of the updated Housing Element is important to enhance the City's eligibility for grant funds and to support the City's local land use authority.

The proposed Housing Element Amendment, including amendment of existing Housing Element policies, is in response to extensive public outreach and analysis of housing trends and issues, including fair housing issues, within the City. As such, the Housing Element Amendment is prepared to address the public's concerns and needs related to housing within the city.

Because several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria, the proposed Housing Element Amendment will facilitate the City's ability to attract new grant funds to improve transportation, infrastructure, open space, and housing. The Housing Element Amendment will help ensure that households seeking different housing types and affordable housing will have opportunities to find housing in San Bruno.

4. The proposed Housing Element Amendment is in the public interest because maintaining consistency with State law requirements ensures that the City General Plan is adequate for City decision making, preserves access to State funding sources and reduces the risk to the community of lawsuits over the adequacy of the General Plan. The attached Exhibit B, which is hereby incorporated by reference, provides substantial evidence demonstrating how each requirement of Housing Element Law is addressed in the proposed Housing Element, in support of the finding that the proposed Housing Element is in substantial conformance with State law .
5. Based on substantial evidence in the record the properties listed in the Sites Inventory are located in the City's commercial corridors within proximity to high quality transit, with existing uses that have low building to

land value. Furthermore, the City has experienced increased development activity within the TCP as a result of the 2021 rezoning. For these reasons, and based on the additional evidence in the record, the City Council hereby finds that 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 sites during the planning period. Table 6-6 of the Housing Element, along with other evidence in the record, provides substantial evidence to support the finding that existing uses are likely to be discontinued during the planning period, and is hereby incorporated by reference.

6. As required by Government Code Section 65585(e), the City Council has considered the comments made by the Department of Housing and Community Development included in the Department's letter to the City of San Bruno dated October 6, 2022, consistent with Government Code Section 65585(f), and as described in Exhibit C to this resolution, incorporated herein by this reference, the City has updated the Housing Element in response to the findings of the Department to substantially comply with the requirements of State Housing Element Law as interpreted by HCD.
7. The City Council, based on the evidence in the record, finds the proposed Housing Element to be in substantial conformance with State law and the General Plan of the City of San Bruno.

BE IT FURTHER RESOLVED, that the City Council hereby adopts the General Plan text amendment to Policy HS-40 to acknowledge the ALUC local override process as set forth in Exhibit D to this resolution which is incorporated herein by this reference, adopts the 2023–2031 Housing Element Update as set forth in Exhibit A to this resolution which is incorporated herein by this reference, replacing the 2015-2023 Housing Element, and findings that the Housing Element substantially complies with Housing Element Law for the reasons set forth in this Resolution and attachments hereto, and authorizes and directs Staff to submit the Housing Element to the California Department of Housing and Community Development for review and certification pursuant to Government Code Section 65585 (g).

BE IT FURTHER RESOLVED, that the City Council does hereby authorize the City Manager to make non-substantive changes to the 2023-2031 Housing Element related to any comments received from the California Department of Housing and Community Development to gain certification and concurrence that the Housing Element substantially complies with State Housing Element Law.

Dated: January 24, 2023

-o0o-

I, Lupita Huerta, City Clerk, do hereby certify that the foregoing Resolution was duly and regularly passed and adopted by the City Council of the City of San Bruno this 24th day of January 2023 by the following vote:

AYES:	Councilmembers:	_____
NOES:	Councilmembers:	_____
ABSENT:	Councilmembers:	_____

ATTEST:

Lupita Huerta, City Clerk

Exhibit A

DRAFT 2023-2031 HOUSING ELEMENT



City of San Bruno 2023-2031 Housing Element

Adopted Month XX, 2023



San Bruno Housing Element 2023 - 2031

Adopted by
San Bruno City Council
January 24, 2023

City of San Bruno

CITY COUNCIL	PLANNING COMMISSION	CITY STAFF
Rico E. Medina, <i>Mayor</i> Sandy Alvarez Tom Hamilton Marty Medina Michael Salazar	Rick Biasotti Marco Durazo Auros Harman Mary Lou Johnson Thomas Kuhn Kelly Lethin Gerard Madden	Jovan D. Grogan, <i>City Manager</i> Darcy Smith <i>Assistant City Manager</i> Michael Laughlin, <i>Planning and Housing Manager</i> Michael Smith, <i>Senior Planner</i> Eliseo Amaya <i>Assistant Planner</i> Kristie Woo <i>Assistant Planner</i> Paul Chytla-Hinze <i>Planning Intern</i>

TABLE OF CONTENTS

1	INTRODUCTION	1-1
A.	Purpose	1-1
B.	Organization	1-2
C.	Regional Housing Needs Determination.....	1-2
D.	Regional Housing Needs Allocation	1-3
E.	Summary of Accomplishments in the Last Cycle.....	1-4
F.	Relationship to Other General Plan Elements and Related Plans and Programs	1-5
G.	Data Sources.....	1-8
H.	Summary of Changes to State Housing Laws.....	1-8
2	HOUSING NEEDS ASSESSMENT	2-1
A.	Population Growth.....	2-1
B.	Age	2-3
C.	Race and Ethnicity.....	2-4
D.	Income Characteristics	2-6
E.	Housing Tenure	2-8
F.	Tenure by Income and Poverty	2-9
G.	Housing	2-12
H.	Employment and Unemployment	2-16
I.	Industry Sector Composition	2-17
J.	Balance of Jobs and Workers.....	2-18
K.	Rents and Rental Housing Affordability	2-21
L.	Renters and the COVID-19 Pandemic	2-24
M.	Home Prices and Sales Affordability	2-25
N.	Overpayment and Cost-Burdened Households.....	2-28
O.	Housing Overcrowding	2-31
P.	Other Housing Issues	2-34
Q.	Seniors	2-36
R.	People with Disabilities.....	2-38
S.	Female-Headed Households.....	2-41
T.	Large Households	2-42
U.	Extremely Low-Income Households	2-44
V.	Homeless Needs	2-45
W.	Farmworkers.....	2-49
X.	Non-English Speakers.....	2-51
Y.	Assisted Housing Developments At-Risk of Conversion	2-53
Z.	Energy Conservation	2-55
AA.	Conclusion.....	2-57
3	HOUSING CONSTRAINTS AND RESOURCES.....	3-1
A.	Governmental Constraints.....	3-1
B.	Funding Sources for Affordable Housing.....	3-28
C.	Environmental Constraints	3-33
D.	Market and Other Non-Governmental Constraints	3-35

4	AFFIRMATIVELY FURTHERING FAIR HOUSING	4-1
A.	What is Affirmatively Furthering Fair Housing?	4-1
B.	Fair Housing Assessment.....	4-2
C.	Resident Needs Fair Housing Survey	4-3
D.	Fair Housing Enforcement and Outreach Capacity	4-5
E.	Integration and Segregation	4-8
F.	Racially/ Ethnically Concentrated Area of Poverty (R/ECAP) or Affluence (R/ECAA).....	4-26
G.	Access to Opportunity	4-28
H.	Disproportionate Housing Needs.....	4-39
I.	Contributing Factors	4-50
J.	Goal 4 of the City's Housing Element Policies and Programs: Promoting Equity in Housing.....	4-51
5	PUBLIC OUTREACH	5-1
A.	Creating an Affordable Future Webinar Series.....	5-2
B.	Outreach Panels.....	5-3
C.	Equity Advisory Group.....	5-7
D.	San Mateo County Fair Housing Survey	5-7
E.	Key Takeaways	5-8
6	SITES INVENTORY AND QUANTIFIED OBJECTIVES	6-1
A.	No Net Loss Law	6-1
B.	Purpose of Sites Inventory	6-2
C.	Existing Land Use Summary	6-5
D.	Summary of 2015-2023 Housing Entitlements	6-5
E.	Assisted Housing Supply.....	6-7
F.	Housing Production Underway.....	6-7
G.	Additional Development Potential.....	6-7
H.	Opportunity Sites and Realistic Capacity.....	6-9
I.	Quantified Objectives	6-23
7	GOALS, PROGRAMS, AND IMPLEMENTATION ACTIONS FOR 2023-2031.....	7-1
A.	Key Input and Directions	7-1
B.	Goals	7-2

APPENDICES

Appendix A	Housing Element Accomplishments
Appendix B	Housing Construction and Development Costs
Appendix C	City of San Bruno Fair Housing Assessment
Appendix D	AFFH Map and Data Packet
Appendix E	San Bruno AFFH Segregation Report
Appendix F	AFFH Resident Survey Analysis
Appendix G	Sites Inventory AFFH Supplement
Appendix H	Disparate Access to Educational Opportunities
Appendix I	State Fair Housing Laws and Regulations
Appendix J	Summary of Public Engagement and Community Correspondence
Appendix K	Complete Site Inventory
Appendix L	Housing Trust Fund Memo for San Bruno



List of Figures

Figure 2-1	Population Growth Trends	2-2
Figure 2-2	San Bruno Population by Race, 2000-2019	2-4
Figure 2-3	San Bruno Senior and Youth Population by Race	2-5
Figure 2-4	Households by Household Income Level	2-7
Figure 2-5	Poverty Status by Race	2-7
Figure 2-6	Housing Tenure	2-8
Figure 2-7	Housing Tenure by Race of Householder	2-9
Figure 2-8	Household Income Level by Tenure	2-10
Figure 2-9	Housing Tenure by Age	2-10
Figure 2-10	Housing Tenure by Housing Type	2-11
Figure 2-11	Housing Units by Year Structure Built	2-12
Figure 2-12	Housing Type Trends	2-13
Figure 2-13	Vacant Units by Type	2-14
Figure 2-14	Household Type	2-15
Figure 2-15	Jobs in a Jurisdiction	2-16
Figure 2-16	Unemployment Rate	2-17
Figure 2-17	Resident Employment by Industry	2-18
Figure 2-18	Employed Residents and Jobs in San Bruno by Wage Group	2-19
Figure 2-19	Jobs-Worker Ratios, By Wage Group	2-20
Figure 2-20	Jobs-Household Ratio	2-21
Figure 2-21	Median Contract Rent	2-22
Figure 2-22	Contract Rents for Renter-Occupied Units	2-23
Figure 2-23	Home Values of Owner-Occupied Units	2-26
Figure 2-24	Zillow Home Value Index (ZHVI)	2-27
Figure 2-25	Cost Burden by Tenure	2-29
Figure 2-26	Cost Burden by Income Level	2-29
Figure 2-27	Cost Burden by Race	2-30
Figure 2-28	Cost-Burdened Senior Households by Income Level	2-30
Figure 2-29	Cost Burden by Household Size	2-31
Figure 2-30	San Bruno Overcrowding by Tenure and Severity	2-32
Figure 2-31	Overcrowding by Income Level and Severity	2-33
Figure 2-32	Overcrowding by Race	2-33
Figure 2-33	Housing Units by Year Structure Built	2-34
Figure 2-34	Substandard Housing Issues	2-35
Figure 2-35	San Bruno Senior Households by Income and Tenure	2-37
Figure 2-36	Disability by Type	2-39
Figure 2-37	Household Type	2-42
Figure 2-38	Female-Headed Households by Poverty Status	2-42
Figure 2-39	Household Size by Tenure	2-43
Figure 2-40	Housing Units by Number of Bedrooms	2-44
Figure 2-41	Racial Group Share of General and Homeless Populations, San Mateo County	2-46
Figure 2-42	Homelessness by Household Type and Shelter Status, San Mateo County	2-46
Figure 2-43	Latino Share of General and Homeless Populations, San Mateo County	2-47
Figure 2-44	Characteristics for the Population Experiencing Homelessness, San Mateo County	2-47
Figure 2-45	Farm Operations and Farm Labor by County, San Mateo County	2-50
Figure 2-46	Population with Limited English Proficiency	2-51
Figure 3-1	San Bruno 2025 General Plan Land Use Diagram	3-3
Figure 3-2	SFO ALUCP Map of Noise Compatibility Zones	3-7
Figure 4-1	Fair Housing Complaints and Inquiries	4-6
Figure 4-2	Segregation and Integration Key Fair Housing Factors	4-8
Figure 4-3	Proposed RHNA Sites in Relation to Predominant Populations by Census Tract	4-11
Figure 4-4	Proposed RHNA Sites in Relation to Neighborhood Segregation Typologies	4-13

Figure 4-5	Proposed RHNA Sites in Relation to Median Income by Census Tract.....	4-17
Figure 4-6	Proposed RHNA Sites in Relation to Percent of Population with a Disability by Census Tract	4-20
Figure 4-7	Proposed RHNA Sites in Relation to the Percentage of Female Headed Households by Tract.....	4-22
Figure 4-8	Proposed RHNA Sites in Relation to Racially Concentrated Areas of Affluence	4-27
Figure 4-9	Access to Opportunity Key Facts	4-28
Figure 4-10	Proposed RHNA Sites in Relation to TCAC Education Opportunity by Tract	4-30
Figure 4-11	Proposed RHNA Sites in Relation to Job Proximity	4-32
Figure 4-12	Proposed RHNA Sites in Relation to Proximity to Transit Stops.....	4-34
Figure 4-13	Proposed RHNA Sites in Relation to Environmental Health and Disadvantaged Communities	4-35
Figure 4-14	Proposed RHNA Sites in Relation to TCAC Composite Opportunity Areas.....	4-38
Figure 4-15	Disproportionate Housing Needs Key Facts	4-40
Figure 4-16	Proposed RHNA Sites in Relation to Percentage of Cost Burdened Homeowners by Tract	4-42
Figure 4-17	Proposed RHNA Sites in Relation to Percentage of Cost Burdened Renters by Tract.....	4-43
Figure 4-18	Proposed RHNA Sites in Relation to the Percentage of Overcrowded Households by Tract.....	4-45
Figure 4-19	Proposed RHNA Sites in Relation to Census Tracts Vulnerable to Displacement.....	4-46
Figure 6-1	Map of Housing Opportunity Sites	6-10



List of Tables

Table 1-1	Regional Housing Needs Allocation	1-3
Table 1-2	San Bruno's RHNA	1-4
Table 2-1	Population Growth Trends	2-2
Table 2-2	San Bruno Population by Age	2-3
Table 2-3	Regional Comparison – Population by Race	2-4
Table 2-4	Income Category Definitions	2-6
Table 2-5	San Mateo County Income Limits (2022)	2-6
Table 2-6	Tenure of Housing (2000, 2011 and 2019)	2-8
Table 2-7	Total Housing Units (2000, 2010 and 2019)	2-12
Table 2-8	Overall Occupancy Status and Vacancy Rates	2-13
Table 2-9	Family Households with Children	2-15
Table 2-10	Employed Residents in San Bruno by Wage Group	2-19
Table 2-11	Median Rents in October 2022 – San Bruno	2-23
Table 2-12	2022 San Mateo Maximum Affordable Rent Payments	2-24
Table 2-13	Who Can Afford to Rent in San Mateo County	2-25
Table 2-14	Median Single-Family and Condo Sales Prices (2010, 2015, 2020 and Fourth Quarter 2021)	2-26
Table 2-15	Households by Household Size	2-32
Table 2-16	Housing Permitting	2-34
Table 2-17	San Mateo County Seniors in 2020 and 2030	2-37
Table 2-18	Senior Households by Income and Tenure	2-38
Table 2-19	San Bruno Cost Burden of Senior Households by Income	2-38
Table 2-20	Population with Developmental Disabilities by Residence	2-40
Table 2-21	Students in Local Public Schools Experiencing Homelessness	2-48
Table 2-22	San Mateo County Point-in-Time Homeless Counts	2-48
Table 2-23	Migrant Worker Student Population	2-50
Table 2-24	Assisted Units at Risk of Conversion	2-53
Table 2-25	Assisted Housing Developments in San Bruno	2-54
Table 3-1	Residential Parking Requirements	3-5
Table 3-2	City of San Bruno Property Development Regulations for Residential Districts	3-9
Table 3-3	City of San Bruno Property Development Regulations for Mixed-Use Districts	3-10
Table 3-4	Housing Types Permitted by Zoning District	3-17
Table 3-5	Timelines for Permit Procedures in San Bruno	3-17
Table 3-6	Typical San Bruno Processing Procedures by Residential Project Type	3-18
Table 3-7	Affordable Housing Linkage Fee	3-20
Table 3-8	Other Development Fees, Projects Requiring Entitlement Application (2022)	3-22
Table 3-9	Development Impact Fees FY2022 - 2023	3-23
Table 3-10	San Mateo County Jurisdictions Total Fees (2022)	3-24
Table 3-11	San Bruno Water Demand Comparison	3-25
Table 4-1	Site Inventory in Census Tract 6041.02	4-23
Table 4-2	Site Inventory in Census Tracts 6041.03/6041.04	4-24
Table 4-3	Site Inventory in Census Tract 6038.02	4-25
Table 4-4	Site Inventory in Census Tract 6039.00	4-25
Table 4-5	Site Inventory in Census Tract 6040.00	4-25
Table 4-6	Fair Housing Factors for Integration and Segregation and Site Inventory by Census Tract	4-26
Table 4-7	Fair Housing Factors for Access to Opportunity and Site Inventory by Census Tract	4-39
Table 4-8	Disproportionate Housing Needs Fair Housing Factors and Site Inventory Summary by Census Tract	4-48
Table 6-1	San Bruno's RHNA by Affordability	6-1
Table 6-2	Meeting San Bruno's RHNA	6-2
Table 6-3	Summary of Housing Production under Last RHNA (2015-2023)	6-3
Table 6-4	Housing Production Underway and Approval Pipeline for 2023-2031 RHNA	6-4
Table 6-5	Housing Opportunity Sites Zoned for Residential Development (Counted for RHNA)	6-11

TABLE OF CONTENTS

Table 6-6	Site Inventory Justification	6-17
Table 6-7	ADU Affordability Assumptions	6-23
Table 6-8	Total Quantified Objectives	6-24
Table 7-1	Housing Element Goals Summary	7-2



1 Introduction



A. PURPOSE

The Housing Element of the General Plan is designed to provide the City of San Bruno with a coordinated and comprehensive strategy for promoting the production of safe, decent, and affordable housing within the community. A priority of both state and local governments, Government Code Section 65580 states the intent of creating housing elements: The availability of housing is of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every Californian, including farmworkers, is a priority of the highest order.

Per state law, the Housing Element has two main purposes:

1. To provide an assessment of both current and future housing needs and constraints in meeting these needs; and
2. To provide a strategy that establishes housing goals, policies, and programs.

In accordance with California Government Code (Title 7, Division 1, Chapter 3, Article 10.6), this Housing Element, presents a comprehensive set of housing policies and actions to address identified housing needs for the next eight years, from January 31, 2023, to January 31, 2031.

The Housing Element builds on an assessment of San Bruno's housing needs (including the City's regional housing needs allocation) and an evaluation of existing housing programs, available land, and constraints on housing production. Initiatives proposed to facilitate ongoing provision of affordable and market-rate housing in the city include conservation of residential neighborhoods, reuse of former school sites, redevelopment of transit corridors into mixed-use areas with residential components, and reduction of parking standards for housing units along transit corridors. All of these major initiatives are consistent with San Bruno's adopted General Plan, Transit Corridors Plan (TCP), U.S. Navy Site Specific Plan, and Bayhill Specific Plan.

B. ORGANIZATION

This Housing Element addresses all of the topics required by state law (Government Code sections 65583 through 65589.7). Specifically, the Element describes:

- population and employment trends (Chapter 2);
- household characteristics and housing stock characteristics (Chapter 2);
- existing assisted housing and potential risk of conversion to market rates (Chapter 2);
- energy conservation (Chapter 2);
- special housing needs (Chapters 2 and 4);
- governmental and non-governmental constraints (Chapter 3);
- affirmatively furthering fair housing (AFFH) (Chapter 4);
- public engagement to all segments of the community and description of how input will be incorporated into the housing element (Chapter 5);
- a detailed site inventory addressing availability and suitability for affordable housing development (Chapter 6);
- quantified objectives that estimate the maximum number of units, by income level, to be constructed, rehabilitated or conserved over the planning period (Chapter 6);
- a new eight-year housing program with goals, programs, and implementation actions (Chapter 7); and
- detailed accomplishments during the last Housing Element cycle (Appendix A).

C. REGIONAL HOUSING NEEDS DETERMINATION

The Bay Area continues to see growth in both population and jobs, which means more housing of various types and sizes is needed to ensure that residents across all income levels, ages, and abilities have a place to call home. While the number of people drawn to the region over the past 30 years has steadily increased, housing production has not kept pace, contributing to the housing shortage that communities are experiencing today. In many cities, the limited housing supply has resulted in residents being priced out, increased traffic congestion caused by longer commutes, and fewer people across incomes being able to purchase homes or meet rising rents.

The Plan Bay Area 2050 Final Blueprint forecasts that the nine-county Bay Area will add 1.4 million new households between 2015 and 2050.¹ For the eight-year timeframe covered by this Housing Element (2023-2031), the California Department of Housing and Community Development (HCD) has identified the Bay Area region's housing need as 441,176 units. The total number of housing units assigned by HCD for a region is separated into four income categories that cover housing types for all income levels, from very low-income households to market rate housing.² This total number of housing units assigned to the region,

¹ Plan Bay Area 2050 is a long-range plan charting the course for the future of the nine-county San Francisco Bay Area. The Plan was adopted in October 2021 by the Metropolitan Transportation Commission. It covers four key issues: the economy, the environment, housing, and transportation.

² HCD divides the RHND into the following four income categories:
Very Low-income: 0-50% of Area Median Income



known as the Regional Housing Needs Determination (RHND), is based on population projections produced by the California Department of Finance as well as adjustments that result from recent legislation requiring HCD to incorporate the region's existing housing need and additional adjustment factors to the baseline growth projection to get closer to healthy housing markets. To this end, adjustments focus on the region's vacancy rate, level of overcrowding and the share of cost burdened households and seek to bring the region more in line with comparable regions. New laws governing the methodology for how HCD calculates the RHND resulted in a significantly higher number of housing units for which the Bay Area must plan compared to previous Regional Housing Needs Allocation or RHNA cycles.

D. REGIONAL HOUSING NEEDS ALLOCATION

A starting point for the Housing Element process for every California jurisdiction is RHNA or the share of the number of regional housing units needed assigned to each jurisdiction by the Association of Bay Area Governments (ABAG), the Bay Area's regional planning agency³. State Housing Element Law requires ABAG to develop a methodology that calculates the number of housing units assigned to each city and county and distributes each jurisdiction's housing unit allocation among four affordability levels (Very Low-Income, Low-Income, Moderate-Income, and Above Moderate-Income). For this cycle, the RHND for the Bay Area increased by 135%, from 187,990 to 441,176. In December 2021, ABAG adopted a Final RHNA Methodology, which was subsequently approved by HCD in January 2022.⁴ For San Bruno, the proposed RHNA is 3,165 units, an increase from the previous cycle which proposed 1,155 units in San Bruno. The total number of housing units and the distribution by income category requires the city choices, types and densities. Table 1-1 identifies the RHNA that San Bruno must provide by affordability level:

TABLE 1-1 REGIONAL HOUSING NEEDS ALLOCATION

Income Group	San Bruno Units	San Mateo County Units	Bay Area Units	San Bruno Percent	San Mateo County Percent	Bay Area Percent
Very Low-Income (<50% of AMI)	704	12,196	114,442	22.2%	25.6%	25.9%
Low-Income (50%-80% of AMI)	405	7,023	65,892	12.8%	14.7%	14.9%
Moderate-Income (80%-120% of AMI)	573	7,937	72,712	18.1%	16.6%	16.5%
Above Moderate-Income (>120% of AMI)	1,483	20,531	188,130	46.9%	43.1%	42.6%
Total	3,165	47,687	441,176	100.0%	100.0%	100.0%

Source: Association of Bay Area Governments.

Low-income: 50-80% of Area Median Income

Moderate-income: 80-120% of Area Median Income

Above Moderate-income: 120% or more of Area Median Income

³ For more information on the RHNA process this cycle, see ABAG's website: <https://abag.ca.gov/our-work/housing/rhna-regional-housing-needs-allocation>.

⁴ Methodology was approved by ABAG's Executive board on December 16, 2021 (Resolution No. 02-2021). HCD approved the ABAG Regional Housing Needs Allocation (RHNA) Plan on January 12, 2022.

E. SUMMARY OF ACCOMPLISHMENTS IN THE LAST CYCLE

1. MEETING THE 2015-2023 REGIONAL HOUSING NEEDS ALLOCATION (RHNA)

The most recent cycle (fifth cycle) covers the 2015 to 2023 period. The City's most recent Housing Element, which covered the fifth cycle, identified adequate sites available to satisfy its RHNA obligation as well as policies and programs to help encourage and facilitate housing production at all income levels. However, the City fell short of meeting its RHNA obligation, even while removing several critical housing constraints. Many more housing development projects were entitled but few received building permits during the time period. Several major projects that submitted development applications and received approvals did not move forward with processing of building permits or construction contributing to the RHNA obligation shortage.

Through 2021, San Bruno has issued building permits for 286 dwelling units over the fifth planning cycle. The summary table below shows the City's current housing production against the RHNA obligation of 1,155 new units for the eight-year period from 2015-2023. Leaving a remaining obligation of 868 housing units. Table 1-2 details how many building permits were issued by each income level against the RHNA target. It is worth noting the City has entitled 521 additional housing units over the course of the planning cycle which are not reflected in the housing production table below because only issued building permits count towards the RHNA obligation.

TABLE 1-2 SAN BRUNO'S RHNA

Income Level	RHNA	2015	2016	2017	2018	2019	2020	2021	Total	Remaining
Very Low	358	0	0	0	0	0	0	20	20	338
Low	161	1	4	14	6	42	7	23	97	64
Moderate	205	1	41	0	0	5	0	21	68	135
Above Moderate	431	9	42	1	0	2	28	18	100	331
Total Units	1,155	11	87	15	6	49	35	82	286	868

Source: Association of Bay Area Governments

Although San Bruno did not satisfy its RHNA obligation, the City entitled 521 new residential units during the fifth planning cycle. These projects are listed below and are currently pending building permit issuance.

- **111 San Bruno Avenue** – 62 for-sale dwelling units in a mixed-use project. Since project entitlement, the applicant has submitted a revised project for 46 dwelling units in a mixed-use building. The City is currently reviewing the application.
- **500 Sylvan Avenue** – Nine multi-family rental units. This project was approved in May 2019. The project was first extended in 2020 and then qualified for an automatic entitlement extension pursuant to Assembly Bill (AB) 1561. Building permits for the project are ready for issuance.
- **Mills Park Center (601-611 and 643-799 El Camino Real; 701-751 Camino Plaza; 711-777 Kains Avenue)** – 427 multi-family residential units in a mixed-use building. The project with a ground floor commercial space was approved in August 2020. The project includes a total of 64 on-site affordable units, including 26 very-low-income units, 19 low-income units and 19 moderate units. Building permits have yet to be submitted.
- **271 El Camino Real** – 23 multi-family for-sale condominium units. The project was approved in September 2021 and is pending building permit submittal. The project will provide three affordable units on-site and pay a partial in-lieu affordable housing fee.



The Sites Inventory and Analysis in Chapter 6 provides a more detailed discussion of the housing production accomplished during the last Housing Element cycle.

2. REMOVING CONSTRAINTS

During the last Housing Element cycle, San Bruno made important progress in removing governmental constraints to the production of housing. Examples include:

- Amended the Zoning Ordinance to permit housing in areas of the city that were once reserved for commercial uses.
- Amended the Zoning Ordinance to classify transitional and supportive housing as residential care facilities, which are allowed by right in residential zones, in accordance with Senate Bill (SB) 2.
- Amended the Zoning Ordinance to implement state density bonus regulations.
- Amended the Zoning Ordinance to implement state accessory dwelling unit regulations.
- Adopted the Bayhill Specific Plan (BSP) in 2021 that includes a housing overlay within a portion of the Bayhill Office Park to allow for new housing units to promote residential uses near a major employment center.
- Amended the Zoning Ordinance to adopt affordable housing impact fees in 2016.

A program-by-program account of accomplishments of the last Housing Element, as well as recommendations for keeping, modifying, or removing programs based on staff's experience with implementation over the last eight years is included in Chapter 3 Governmental and Nongovernmental Constraints and in Appendix A. The evaluation was used as the basis for the housing programs contained in this Element.

F. RELATIONSHIP TO OTHER GENERAL PLAN ELEMENTS AND RELATED PLANS AND PROGRAMS

1. GENERAL PLAN 2025

The San Bruno 2025 General Plan was adopted on March 24, 2009. This updated Housing Element for 2023-2031 is fully consistent with the other elements in the San Bruno 2025 General Plan, and in fact is designed as an integral step in the implementation of General Plan goals and policies.

For instance, Chapter 3: Governmental and Nongovernmental Constraints describes the General Plan Land Use Designations, provides maps of both the General Plan land uses and existing zoning, and explains how the designations work hand-in-hand with Housing Element programs. Several General Plan policies are consistent with and support the goals of the Housing Element. Some examples include General Plan Policy LUD-F: Promote infill and revitalization of the City's shopping centers—including the continued improvement of The Shops at Tanforan and Towne Center—to attract shoppers from throughout the region using convenient BART and Caltrain access. Another example is General Plan Policy LUD-I: Promote development of single-family housing on former school sites owned by public school districts. Retain existing recreation facilities for public use, whenever possible. As these examples highlight, this Housing Element is carefully tuned to the policy priorities of the General Plan, and whenever possible the programs provided herein refer to the General Plan and other important guidance documents such as the Residential Design Guidelines and the Transit Corridors Plan, when describing implementation. The City will continue to review and revise the Housing Element as necessary to maintain General Plan consistency. Concurrently with the

Housing Element update, the City is amending the Health and Safety Element of the General Plan to resolve an inconsistency between the policy and the planning for housing within the 70-75 dB noise contour from the San Francisco International Airport. The City is also working on an environmental justice element, consistent with Government Code Section 65302(h).

2. RELATED PLANS AND PROGRAMS

TRANSIT CORRIDORS SPECIFIC PLAN (TCP)

The San Bruno Transit Corridors Plan (TCP) was adopted on February 12, 2013, following extensive public engagement, including the work of a 17-member Steering Committee and several community workshops. The TCP builds on the General Plan vision for mixed-use transit-oriented development in proximity to the new San Bruno Caltrain station and a revitalized downtown. The TCP seeks to promote economic development and private investment while implementing measures to transition new projects into the existing City. The majority of new residential development in San Bruno will likely occur in the TCP area during the housing element cycle, with plans for up to 1,610 new units.

The approximately 155-acre TCP area includes San Bruno's principal streets of El Camino Real, San Bruno Avenue, Huntington Avenue, and San Mateo Avenue within about ½-mile of the new San Bruno Avenue Caltrain station. The TCP vision and development framework were crafted during two community workshops. The TCP development standards and design guidelines were refined in response to public comments about the impacts of new projects on existing low-density residential uses. To minimize these potential impacts, "Mixed-use to Residential Transition Measures" were included in the adopted plan.

BAYHILL SPECIFIC PLAN

The Bayhill Specific Plan, adopted on September 28, 2021, is a regulatory long-range planning document that outlines a cohesive, long-term plan for the Bayhill Office Park, which is home to the largest cluster of offices in San Bruno, including Walmart.com, the Police Credit Union, the headquarters of YouTube, and other commercial uses. The City anticipates that adoption of the Specific Plan will result in further intensification of land uses beyond what currently exists today. The Specific Plan allows for the following land uses: commercial/retail, office, residential, hotel, civic, and open space.

URBAN WATER MANAGEMENT PLAN

San Bruno updated its Urban Water Management Plan (UWMP) in 2021 in accordance with the requirements of the California Urban Water Management Act. San Bruno receives water from three supply sources: wholesale surface water from the San Francisco Public Utilities Commission (SFPUC), retail surface water purchased from the North Coast County Water District, and local groundwater from the South Westside Groundwater Basin. San Bruno owns and operates a water utility that supplies approximately 50% of water needs annually to the homes and businesses in San Bruno. The primary infrastructure constraint for new housing in San Bruno is related to the availability of water.

The UWMP estimated future water demand using population and employment projections from the General Plan including growth attributable to the Transit Corridors Plan. The UWMP quantifies projected water demands to the year 2035, and the existing and planned sources of water available to the City to meet those demands. San Bruno has a contracted water allotment with the SFPUC but has the ability to purchase additional required supply as a result of other customers not using their full contractual supply. In recent years, San Bruno has purchased less than the contractually allowed amount of water from SFPUC, largely due



to successful water conservation efforts and the implementation of the City’s recycled water project. Based on SFPUC and City projections of future potable water demands, San Bruno is not expected to exceed its available water supply by 2035.

PRIORITY DEVELOPMENT AREAS

Priority Development Areas (PDAs) are places near public transit planned for new homes, jobs and community amenities. Located in downtowns, along main streets and around rail stations, PDAs are planned to help the Bay Area reduce greenhouse gas emissions while increasing the supply of housing. All PDAs are created and planned by local governments, which nominate eligible areas to ABAG for adoption.

PDAs promote greater equity for all by increasing access to housing, economic and cultural opportunities, regardless of race or income. With a variety of mobility options, PDAs enable residents to live a car-free or car-light lifestyle. PDAs are located in places served by existing infrastructure, making the most of public investments and minimizing development impacts on communities and the environment.

The City’s TCP Area is designated as a PDA under the ABAG FOCUS program. The types of development envisioned in the TCP will contribute to the regional strategy to promote development near transit stations and enhancements to existing neighborhoods.

PLAN BAY AREA 2050

Plan Bay Area 2050 is a long-range regional plan that was adopted in 2021 by the Metropolitan Transportation Commission and the Association of Bay Area Governments (ABAG). The plan charts the course for the future of the nine-county San Francisco Bay Area, focusing on four key elements — housing, the economy, transportation, and the environment — and identifies a path to make the Bay Area more equitable for all residents and more resilient in the face of unexpected challenges. The plan builds on the work of ABAG’s , a regional plan which explored the challenges and opportunities the Bay Area is likely to face between 2018 and 2050. Plan Bay Area outlines strategies for growth and investment through the year 2050 through 35 strategies, which are public policies or investments that can be implemented in the Bay Area at the city, county, regional or state level over the next 30 years.

GRAND BOULEVARD INITIATIVE

The Grand Boulevard Initiative (GBI) is a coordinated effort of 19 cities (including San Bruno), San Mateo County and Santa Clara County, as well as local and regional agencies united to improve the performance, safety, and aesthetics of El Camino Real. Starting at the northern Daly City boundary (where it is named Mission Street) and ending near the Diridon Caltrain Station in central San Jose (where it is named The Alameda), the initiative brings together for the first time all of the agencies having responsibility for the condition, use, and performance of the street. The Grand Boulevard Initiative looks to transform El Camino Real from a suburban, low-density strip commercial highway to vibrant, mixed-use pedestrian-friendly boulevard and destination that links regional transportation improvements and local economic development efforts. San Bruno has been an active participant in the GBI task force and working committee and is one of four case study cities for the preliminary design of complete streets improvements along a segment of El Camino Real. San Bruno has also incorporated the GBI Guiding Principles in its General Plan. The GBI is relevant to the Housing Element because it seeks to target housing and job growth in strategic areas along the corridor.

21 ELEMENTS

21 Elements is a collaboration of San Mateo County jurisdictions to share resources and work together to update local housing elements. 21 Elements is co-sponsored and coordinated by the San Mateo County Department of Housing and City/County Association of Governments. 21 Elements provides opportunities for municipalities to share resources, successful strategies, and best practices, and has resulted in stronger local partnerships as well as higher-quality certified Housing Elements. 21 Elements has hired the planning firm of Baird & Driscoll to provide assistance to jurisdictions in preparing the Housing Element and coordination with HCD. In addition, this group is working together to complete a County-Wide Housing Nexus Study to inform future policies as they relate to the City's housing needs and requirements.

G. DATA SOURCES

The housing and demographic data reported in this Housing Element has been collected from a variety of sources, including:

- United States Census and American Community Surveys (ACS)
- Association of Bay Area Governments (ABAG)
- Metropolitan Transportation Commission (MTC)
- State of California, Departments of Finance, Employment Development, Social Services, and Developmental Services
- United States Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS)
- Specific data sources used are identified in each table or figure.
- California Department of Housing and Community Development (HCD)
- City of San Bruno
- County of San Mateo

H. SUMMARY OF CHANGES TO STATE HOUSING LAWS

The following items represent substantive changes to state housing law since the City's last Housing Element was adopted and certified in 2015. The development of the 2023–2031 Housing Element included an analysis of changes to state housing laws which were incorporated into the process and applied throughout the following chapters.

Affordable Housing Streamlined Approval Process: SB 35 (2017), AB 168 (2020), and AB 831 (2020) – SB 35 created a streamlined, ministerial review process for qualifying multifamily, urban infill projects in jurisdictions that have failed to approve housing projects sufficient to meet their state-mandated RHNA. Among other requirements, to qualify for streamlining under SB 35, a project must incorporate specific threshold levels of affordable housing based on a jurisdiction's inability to approve housing projects sufficient to meet their RHNA at the specified affordability levels or have failed to submit an annual progress report as required under state law. AB 168 added a requirement to provide a formal notice to each California Native American tribe that is affiliated with the area of the proposed project. The Housing Element must describe the City's processing procedures related to SB 35.



Additional Housing Element Sites Analysis Requirements: AB 879 (2017) and AB 1397 (2017) – These bills require additional analysis and justification of the sites included in the sites inventory of the City’s Housing Element. The Housing Element may only count non-vacant sites included in one previous housing element inventory and vacant sites included in two previous housing elements if the sites are subject to a program that allows affordable housing by right. Additionally, the bills require additional analysis of non-vacant sites and additional analysis of infrastructure capacity, and place size restrictions on all sites.

Affirmatively Furthering Fair Housing: AB 686 (2017) – AB 686 requires the City to administer its housing programs and activities in a manner to AFFH and not take any action that is inconsistent with this obligation. The Housing Element must include an assessment of fair housing practices, an examination of the relationship of available sites to areas of high opportunity, and actions to AFFH.

No-Net-Loss Zoning: SB 166 (2017) – SB 166 amended the No-Net-Loss rule to require that the land inventory and site identification programs in the Housing Element include sufficient sites to accommodate the unmet RHNA. When a site identified in the Housing Element as available to accommodate the lower-income portion of the RHNA is actually developed for a higher income group, the City must either (1) identify and rezone, if necessary, an adequate substitute site; or (2) demonstrate that the land inventory already contains an adequate substitute site.

Safety Element to Address Adaptation and Resiliency: SB 1035 (2018) – SB 1035 requires the General Plan Safety Element to be reviewed and revised to include any new information on fire hazards, flood hazards, and climate adaptation and resiliency strategies with each revision of the housing element.

By Right Transitional and Permanent Supportive Housing: AB 2162 (2018) and AB 101 (2019) – AB 2162 requires the City to change its zoning to provide a “by right” process and expedited review for supportive housing. The bill prohibits the City from applying a conditional use permit or other discretionary review to the approval of 100% affordable developments that include a percentage of supportive housing units, either 25% or 12 units, whichever is greater. The change in the law applies to sites in zones where multifamily and mixed uses are permitted, including in nonresidential zones permitting multifamily use. Additionally, AB 101 requires that a Low Barrier Navigation Center development be a use by right in mixed-use zones and nonresidential zones permitting multifamily uses if it meets specified requirements.

Accessory Dwelling Units (ADU): AB 2299 (2016), SB 1069 (2016), AB 494 (2017), SB 229 (2017), AB 68 (2019), AB 881 (2019), Assembly 587 (2019), SB 13 (2019), AB 670 (2019), AB 671 (2019), AB 3182 (2020) – In recent years, multiple bills have added requirements for local governments related to ADU ordinances. The 2016 and 2017 updates to state law included changes pertaining to the allowed size of ADUs, permitting ADUs by right in at least some areas of a jurisdiction, and limits on parking requirements related to ADUs. More recent bills reduce the time to review and approve ADU applications to 60 days, remove lot size requirements and replacement parking space requirements and require local jurisdictions to permit junior ADUs. AB 68 allows an ADU and a junior ADU to be built on a single-family lot, if certain conditions are met. The state has also removed owner-occupancy requirements for ADUs, created a tiered fee structure that charges ADUs based on their size and location, prohibits fees on units of less than 750 square feet, and permits ADUs at existing multi-family developments. AB 671 requires the Housing Element to include plans to incentivize and encourage affordable ADU rentals. AB 3182 prohibits homeowner’s associations from imposing rental restrictions on ADUs.

Density Bonus: AB 1763 (2019) and AB 2345 (2020) – AB 1763 amended California’s density bonus law to authorize significant development incentives to encourage 100% affordable housing projects, allowing developments with 100% affordable housing units to receive an 80% density bonus from the otherwise maximum allowable density on the site. If the project is within ½-mile of a major transit stop the City may not apply any density limit to the project, and it can also receive a height increase of up to three additional

stories (or 33 feet). In addition to the density bonus, qualifying projects will receive up to four regulatory concessions. Additionally, the City may not impose minimum parking requirements on projects with 100% affordable housing units that are dedicated to special needs or supportive housing. AB 2345 created additional density bonus incentives for affordable housing units provided in a housing development project. It also requires that the annual report include information regarding density bonuses that were granted.

Housing Crisis Act of 2019: SB 330 (2019) – SB 330 enacts changes to local development policies, permitting, and processes that will be in effect through January 1, 2025. SB 330 places new criteria on the application requirements and processing times for housing developments; prevents localities from decreasing the housing capacity of any site, such as through downzoning or increasing open space requirements, if such a decrease would preclude the jurisdiction from meeting its RHNA housing targets; prohibits localities from imposing a moratorium or similar restriction or limitation on housing development; prevents localities from establishing non-objective standards; and requires that any proposed demolition of housing units be accompanied by a project that would replace or exceed the total number of units demolished. Additionally, any demolished units that were occupied by lower-income households must be replaced with new units affordable to households with those same income levels. The Housing Element must describe the City’s processing procedures related to SB 330.

Surplus Land Act Amendments: AB 1486 and AB 1255 (2019) – AB 1486 refines the Surplus Land Act to provide clarity and further enforcement to increase the supply of affordable housing. The bill requires the City to include specific information relating to surplus lands in the Housing Element and Housing Element Annual Progress Reports, and to provide a list of sites owned by the city or county that have been sold, leased, or otherwise disposed of in the prior year. AB 1255 requires the City to create a central inventory of surplus and excess public land each year. The City is required to transmit the inventory to the Department of Housing and Community Development and to provide it to the public upon request.

Housing Impact Fee Data: AB 1483 (2019) – AB 1483 requires the City to publicly share information about zoning ordinances, development standards, fees, exactions, and affordability requirements. The City is also required to update such information within 30 days of changes. This Housing Element describes governmental constraints on the production of housing, including a look at zoning requirements, development standards, fees, exactions, and affordability requirements. Changes in requirements made during the Housing Element planning period will also be reported as part of the City’s annual Housing Element Progress Report.

Standardization of Sites Inventory Analysis and Reporting: SB 6 (2019) – SB 6 requires the City to electronically submit the sites inventory to HCD starting in 2021. The bill further provides streamlined, ministerial approval processes for certain housing developments and further makes housing an allowable use on “neighborhood lots”.

“Just Cause” Eviction: AB 1482 (2019) – AB 1482 restricts rents from being increased more than 5% plus inflation annually for the next 10 years and requires landlords to demonstrate “just cause” prior to evicting tenants of at least one year. Property owners evicting tenants for renovations or condo constructions must provide relocation fee equal to one month’s rent.

Housing Discrimination: SB 329 (2019) – SB 329 prohibits discrimination against tenants paying for housing with public assistance, such as Section 8 vouchers.

Navigation Centers: AB 101 (2019) – AB 101 requires jurisdictions to approve navigation centers by-right in mixed use and nonresidential zones that allow multifamily uses. Additionally, if a locality has been designated “prohousing” by HCD—compliant with housing element requirements and enacted policies that advance the planning, approval, and construction of housing—extra points will be given on IIG, AHSC and TTC grant

program applications. Awards will be based on categories including favorable zoning, faster processing, reducing costs and financial subsidies.

Additional Density Bonus: AB 1763 (2019) – AB 1763 provides enhanced density bonus for 100% affordable developments including 80% density bonus and no density limit if within ½-mile of a major transit stop under State Density Bonus Law.

Evacuation Routes: SB 99 and AB 747 (2019) – Two recent bills, AB 747 and SB 99, require the General Plan Safety Element to be updated to identify evacuation routes and their capacity, safety, and viability under a range of emergency scenarios and to include information identifying residential developments in hazard areas that do not have at least two emergency evacuation routes. The bill requires these updates to occur with this Housing Element.

Housing Crisis Act Clean-up Bill: SB 8 (2021) – SB 8 is a clean-up bill impacting several previous housing initiatives. Notably, it extends key provisions of SB 330, also known as the Housing Crisis Act of 2019 (previously set to expire in 2025), until January 1, 2030. The bill further states that affordable and market rate residential projects with two or more units; mixed-use projects of which two-thirds of the square footage is residential; emergency shelters; and transitional or supportive housing may qualify for review pursuant to the Housing Accountability Act.

SB 8 further amends the Government Code to state that with respect to land where housing is an allowable use, an affected jurisdiction, as defined by HCD, cannot change the general plan land use designation, specific plan land use designation, or zoning of a parcel or parcels of property to a less intensive use or reducing the intensity of land use within an existing general plan land use designation, specific plan land use designation, or zoning district in effect at the time of the proposed change. “Reducing the intensity of land use” includes, but is not limited to, reductions to height, density, or floor area ratio, new or increased open space or lot size requirements, new or increased setback requirements, minimum frontage requirements, or maximum lot coverage limitations, or any other action that would individually or cumulatively reduce the site’s residential development capacity.

Additionally, SB 8 provides that a city or county may not approve a housing development project that will require the demolition of occupied or vacant protected rental units unless all requirements are met. These requirements include that the project will replace all existing or demolished protected units and that the housing development project will include at least as many residential dwelling units as the greatest number of residential dwelling units that existed on the project site within the last five years.

Duplexes and Urban Lot Splits: SB 9 (2021) – This bill allows property owners to subdivide a single-family residential property into two lots, where two units can be built on each newly created lot. This would allow up to a total of four units in an existing R-1 zoned property with a ministerial review process.

CEQA Streamlining for Rezoning up to 10 Units: SB 10 (2021) – This legislation creates a voluntary process for local governments to pass ordinances prior to January 1, 2029, to zone any parcel for up to 10 residential units if located in transit rich areas and urban infill sites. Adopting a local ordinance or a resolution to amend a general plan consistent with such an ordinance would be exempt from review under the California Environmental Quality Act (CEQA). This provides cities an increased ability to upzone property for housing without the processing delays and litigation risks associated with CEQA. However, if the new housing authorized by the general plan would require a discretionary approval to actually build the housing (for example, a subdivision map or design review), CEQA review would be required for those subsequent approvals.

Housing Element Regional Housing Need Relative Progress Determination: AB 215 (2021) – This bill would require a local government to make the first draft revision of a housing element available for public comment for at least 30 days and, if any comments are received, take at least 10 additional business days to consider and incorporate public comments into the draft revision before submitting it to HCD for review. Furthermore, a jurisdiction is required to post any subsequent draft revision on its internet website and to email a link to the draft revision to individuals and organizations that have requested notices relating to the local government's housing element, as specified. This bill also expands the attorney general's authority to independently seek action and grants HCD the ability to hire or appoint other counsel if the attorney general does not pursue action against a local agency that has violated certain housing laws, inclusive of the HCA, AFFH policies (AB 686), SB 35 Streamlining, Permanent Supportive Housing streamlining (AB 2162) and Low Barrier Navigation Center streamlining (AB 101). As such, this law strengthens the enforcement tools that may be used against noncompliant jurisdictions. As a result of this bill, HCD established the Housing Accountability Unit and the Attorney General established the Housing “Strike Force” to actively monitor compliance with state housing laws.





The 2023-2031 Housing Element provides a roadmap for how to meet San Bruno’s growth and housing challenges. The Housing Needs Assessment identifies what the existing housing conditions and community needs are. This chapter provides demographic and housing market information to evaluate existing and future housing needs. The COVID-19 Pandemic has resulted in unprecedented changes in many data series, making analysis and predictions for the economy and housing markets more challenging. The main purpose of this assessment is to provide a basic profile of existing conditions and historical trends in San Bruno as a starting point for identifying housing needs. It will also identify population groups with the greatest housing needs and to provide direction and focus for future housing initiatives.

A. POPULATION GROWTH

The Bay Area is the fifth-largest metropolitan area in the nation and has seen a steady increase in population since 1990, except for a dip during the 2007-2009 Great Recession and the recent unprecedented impacts of the COVID-19 Pandemic. Many cities in the region have experienced a strong economy drawing new residents and significant growth in jobs and population. While these trends have led to a corresponding increase in demand for housing across the region, the regional housing production has not kept pace with job and population growth.

In 2020, the population of San Bruno was estimated to be 45,454 and made-up 6% of the population in San Mateo County. While the population of San Bruno, San Mateo County and the Bay Area has steadily increased over the last two decades, the rate of growth has been cyclical and most recently slowing (Figure 2--1), with a slight decline during the COVID-19 pandemic. The graph below and the table that follows, show population trends in San Bruno in comparison to the rate of population growth in San Mateo County and the Bay Area.

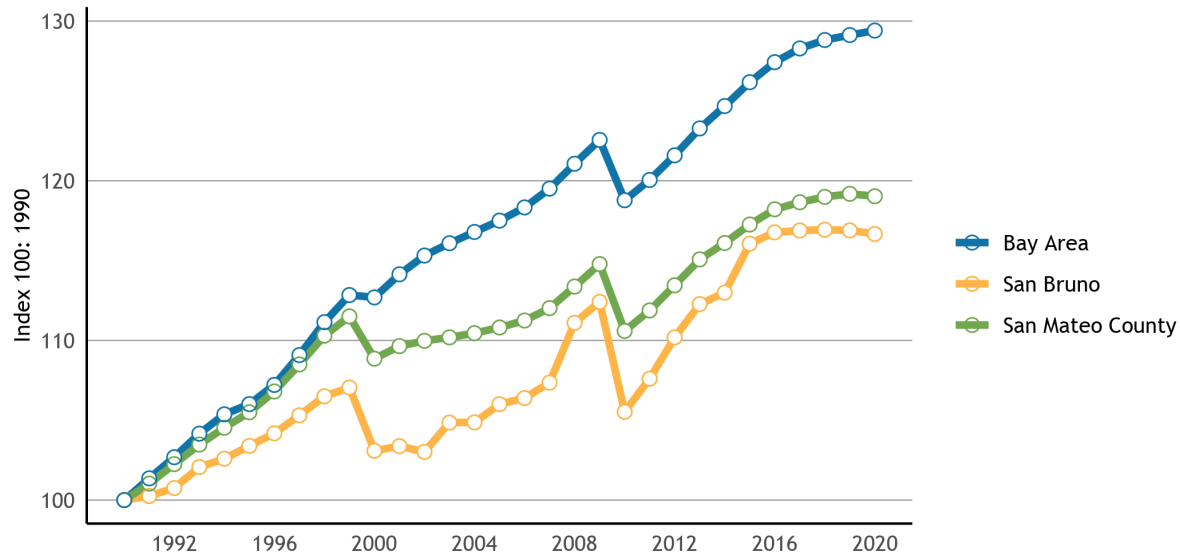


Figure 2-1 Population Growth Trends

Source: California Department of Finance, E-5 series.

TABLE 2-1 POPULATION GROWTH TRENDS

	Number			Percent Change		
	San Bruno	San Mateo County	Bay Area	San Bruno	San Mateo County	Bay Area
1990	38,961	649,623	6,020,147			
2000	40,165	707,163	6,784,348	3%	9%	13%
2010	41,114	718,451	7,150,739	2%	2%	5%
2020	45,454	773,244	7,790,537	11%	8%	9%

Source: California Department of Finance, E-5 series.¹

In the last two decades, the fastest rate of population growth across the region occurred from 2010 to 2016 in the aftermath of the 2007-2009 Great Recession. Following the recession from 2011 through 2019, the economy recovered strongly, in part due to the rapid growth of the Silicon Valley technology sector. In addition to the strong job growth, lower housing prices following the 2007 housing crash fueled new immigration. After 2016, population growth began to gradually slow throughout the region. Both San Mateo County and San Bruno saw a population decline between 2018 and 2019. Despite strong economic conditions, population growth has slowed significantly since the mid-2010s, as rising housing costs have resulted in increased numbers of domestic residents relocating to more affordable housing markets.

¹ To compare the rate of growth across various geographic scales, Figure 2-1 shows population for the jurisdiction, county, and region indexed to the population in the year 1990. This means that the data points represent the population growth (i.e., percent change) in each of these geographies relative to their populations in 1990.



Because of the COVID-19 Pandemic, the region has experienced significant net out-migration to more affordable areas, spurred by an increase in remote working arrangements.² According to the California Department of Transportation, approximately 4,000 net migrants left the San Mateo County in 2020 and an average of 2,800 will leave between 2021 and 2026.³ In the “San Francisco-San Mateo-Redwood City, California Comprehensive Housing Market Analysis as of December 1, 2020”, the U.S. Department of Housing and Urban Development (HUD), estimates population growth is expected to continue during the 3--year forecast period (2021-2023), but at a significantly slower rate given weak economic conditions and continued net out-migration due to continued high housing costs.

B. AGE

The distribution of age groups in a city shapes what types of housing the community may need in the future. An increase in the older population may mean there is a developing need for more senior housing options, while higher numbers of children and young families can point to the need for more family housing options and related services. There has also been a move by many to age-in-place or downsize to stay within their communities, which can mean more multi-family and accessible units are also needed.

San Bruno, like other cities in San Mateo County, can expect to see a dramatic increase in the number of seniors as the baby boomer generation ages. In 2019, San Bruno’s senior population 65 and older made-up 15% of the population. From 2000 to 2019, the 85-and-over population increased by 36% and the 65 to 74 population increased by 66% (Table 2-2). A key challenge in the coming years will be how to accommodate the housing needs of aging residents. In 2019, San Bruno’s youth population under the age of 18 made up 19% of the city and from 2000 to 2019, the population of those under 24 has decreased by 6-12% depending on the age group (Table 2-2). As a result of these demographic shifts, the median age in San Bruno increased from 36.2 in 2000 to 39 in 2019.

TABLE 2-2 SAN BRUNO POPULATION BY AGE

Age Group	2000 % of Total	2010 % of Total	2019 % of Total	% Increase 2000–2019
Age 0-4	6%	6%	5%	-10%
Age 5-14	13%	11%	11%	-12%
Age 15-24	12%	12%	11%	-6%
Age 25-34	16%	15%	17%	11%
Age 35-44	18%	14%	15%	-13%
Age 45-54	15%	16%	15%	8%
Age 55-64	9%	13%	12%	57%
Age 65-74	6%	7%	9%	66%
Age 75-84	4%	4%	4%	8%
Age 85+	1%	2%	2%	36%
Totals	100% (40,165)	100% (41,114)	100% (43,083)	

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B03002.

² Comprehensive Housing Market Analysis for San Francisco-San Mateo-Redwood City, California (huduser.gov).

³ California Department of Transportation: San Mateo County Economic Forecast.

C. RACE AND ETHNICITY

Understanding the racial makeup of a city and region is important for designing and implementing effective housing policies and programs. These patterns are shaped by both market factors and government actions, such as exclusionary zoning, discriminatory lending practices and displacement that has occurred over time and continues to impact communities of color today.

According to the American Community Survey, approximately 33% of San Bruno residents are White, declining from about half of residents in the last two decades. The percentage of Asian San Bruno residents has grown from 22% to 34% in the same period. The Hispanic or Latino population has remained more stable, growing from 25% to 27% in the same period (Figure 2-2).

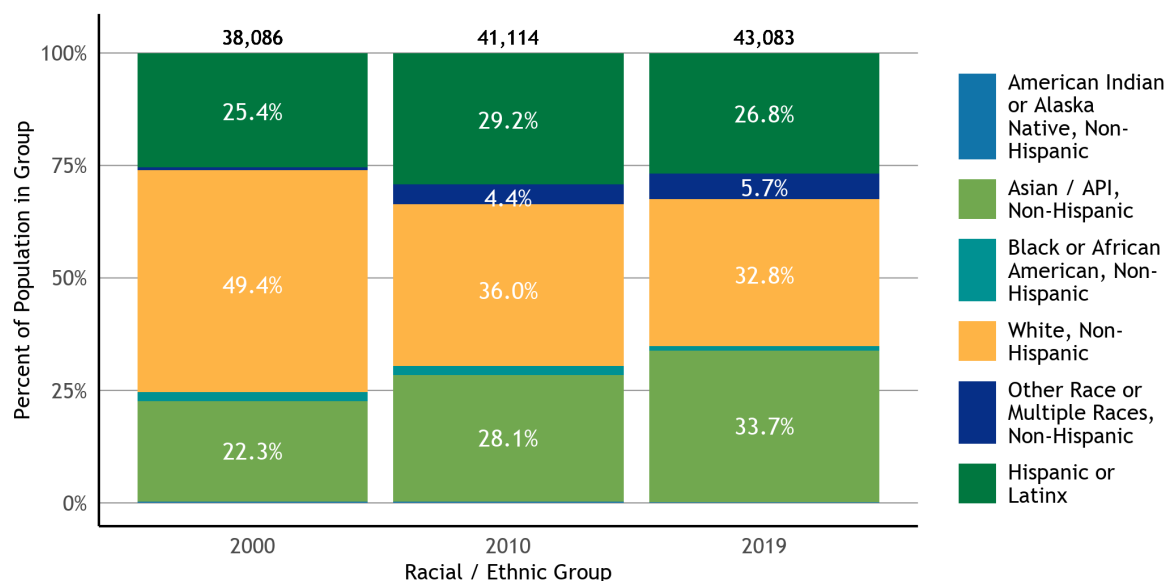


Figure 2-2 San Bruno Population by Race, 2000-2019

Source: U.S. Census Bureau, Census 2000, Table P004; U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B03002.

The overall racial and ethnic composition of San Bruno, San Mateo County and the Bay Area are similar with small differences between them (Table 2-3). San Bruno has a slightly larger proportion of Asian and Hispanic residents as well as a smaller proportion of White and Black residents than the county and region.

TABLE 2-3 REGIONAL COMPARISON – POPULATION BY RACE

	American Indian or Alaska Native, Non-Hispanic	Asian/API, Non-Hispanic	Black or African American, Non-Hispanic	White, Non-Hispanic	Other Race or Multiple Races, Non-Hispanic	Hispanic or Latino	Total Population
San Bruno	<1%	34%	1%	33%	6%	27%	43,083
San Mateo County	<1%	30%	2%	39%	4%	24%	767,423
Bay Area	<1%	27%	6%	39%	5%	24%	7,710,026

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B03002.



Looking at the senior and youth population by race can add an additional layer of understanding, as families and seniors of color are even more likely to experience challenges finding affordable housing. In San Bruno, people of color (non-white racial groups) make up 38% of seniors and 60% of youth under 18 (Figure 2-3).

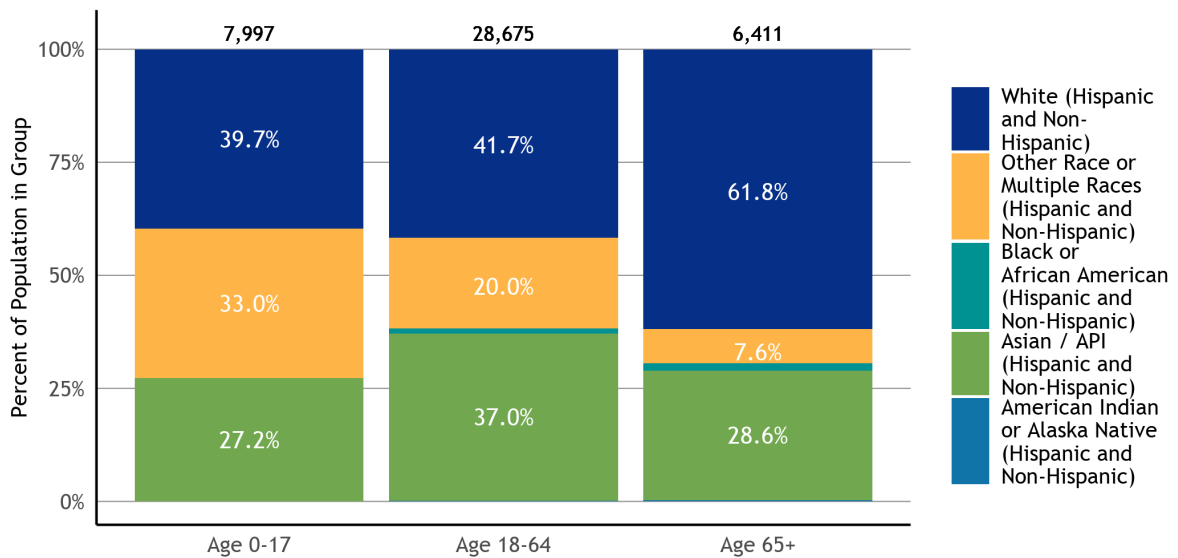


Figure 2-3 San Bruno Senior and Youth Population by Race

Universe: Total population.

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B01001(A-G).

KEY POINTS: POPULATION GROWTH AND DEMOGRAPHICS

- While population growth has significantly increased throughout the Bay Area, San Mateo County, and San Bruno over the last two decades, the rate of growth has been cyclical and began to slow down in 2016.
- Despite strong economic conditions, population growth has begun to slow partly due to rising housing costs as residents relocate to more affordable housing markets. The COVID-19 Pandemic has contributed to slower population growth in recent years.
- In San Bruno, from 2000 to 2019, the population of those under 14 has decreased by 11%, while the 65-and-over population has increased by 36%. These trends are mirrored in the region. A key challenge in the coming years will be how to accommodate the needs of aging residents.
- From 2000 to 2019, the fastest growing race/ethnic group in San Bruno was Asian. San Bruno also has a large Hispanic population which has remained stable over the same period. The White population has steadily decreased from half in 2000 to 33% in 2019.
- In San Bruno, people of color (non-white racial groups) make up 38% of seniors and 60% of youth under 18.

D. INCOME CHARACTERISTICS

The U.S. Department of Housing and Urban Development (HUD) and the California Department of Housing and Community Development (HCD) use household income categories to help standardize analysis of housing needs. HCD divides the Regional Housing Needs Determination (RHND) into the four income categories identified in Table 2-4.

TABLE 2-4 INCOME CATEGORY DEFINITIONS

Extremely Low-Income	0% - 30% of area median income
Very Low-Income	30% - 50% of area median income
Low-Income	50% - 80% of area median income
Moderate-Income	80% - 120% of area median income
Above Moderate-Income	>120% of area median income

The income categories are summarized below and are based on a household's percentage of San Mateo County's Area Median Income (AMI). HCD uses these categories to establish the annual income limits for San Mateo County, as shown in the Table 2-5.⁴

TABLE 2-5 SAN MATEO COUNTY INCOME LIMITS (2022)

Income Category	Number of Persons Per Household (Maximum Income)				
	1	2	3	4	5
Extremely Low	\$39,150	\$44,750	\$50,350	\$55,900	\$60,400
Very Low	\$65,250	\$74,600	\$83,900	\$93,200	\$100,700
Low-Income	\$104,400	\$119,300	\$134,200	\$149,100	\$161,050
Median-Income	\$116,200	\$132,800	\$149,400	\$166,000	\$179,300
Moderate-Income	\$139,450	\$159,350	\$179,300	\$199,200	\$215,150

Source: HCD State Income Limits 2022 and State CDBG and HOME Income Limits.

The graph below shows the distribution of households by income in San Bruno, San Mateo County and the Bay Area.⁵ Almost half San Bruno's households are lower income (45%): approximately 14% are extremely low-income, 11% are very low-income, and 20% are low-income. In San Bruno, 42% of households earn more than 100% of the AMI, compared to 14% making less than 30% of AMI, which is considered extremely low-income (Figure 2-4). These residents are particularly at risk for overpaying for housing.

Similar trends occur regionally, for example, in San Mateo County and the Bay Area, approximately half of all households make more than 100% AMI, while 13%-15% make less than 30% AMI. In San Mateo County, 30% AMI is the equivalent to the annual income of \$54,800 for a family of four. Many households with multiple wage earners – including food service workers, full-time students, teachers, farmworkers, and healthcare professionals – can fall into lower AMI categories due to relatively stagnant wages in many

⁴ According to the U.S. Census Bureau, Population Estimates Program, the overall median household income in San Bruno is \$113,100, lower than the countywide median of \$128,090 (2020 estimates). Estimate is based on Income in the Past 12 Months and based on data collected in the American Community Survey (ACS).

⁵ Income groups are based on HUD calculations for Area Median Income (AMI). The AMI levels in this chart are based on the HUD metro area where this jurisdiction is located. Households making between 80 and 120 percent of the AMI are moderate-income, those making 50 to 80 percent are low-income, those making 30 to 50 percent are very low-income, and those making less than 30 percent are extremely low-income. This is then adjusted for household size.



industries. Despite the economic and job growth experienced throughout the region since 1990, the income gap has continued to widen. California is one of the most economically unequal states in the nation.⁶

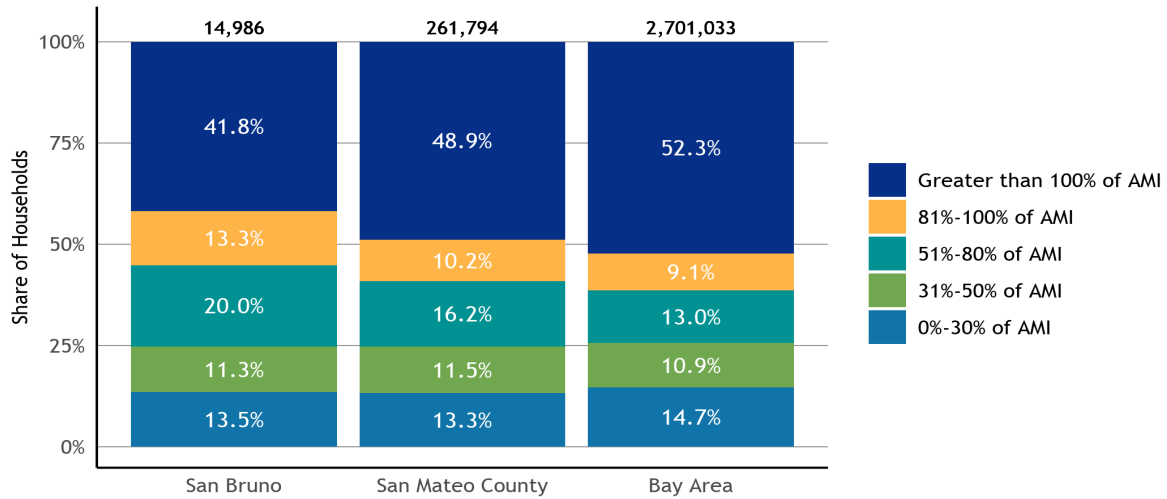


Figure 2-4 Households by Household Income Level

Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release.

Currently, people of color are more likely to experience poverty and financial instability as a result of federal and local housing policies that have historically excluded them from the same opportunities extended to white residents.⁷ These economic disparities also leave communities of color at higher risk for housing insecurity, displacement or homelessness. In San Bruno, American Indian or Alaska Native (Hispanic and Non-Hispanic) residents experience the highest rates of poverty, followed by Black or African American (Hispanic and Non-Hispanic) residents (Figure 2-5).

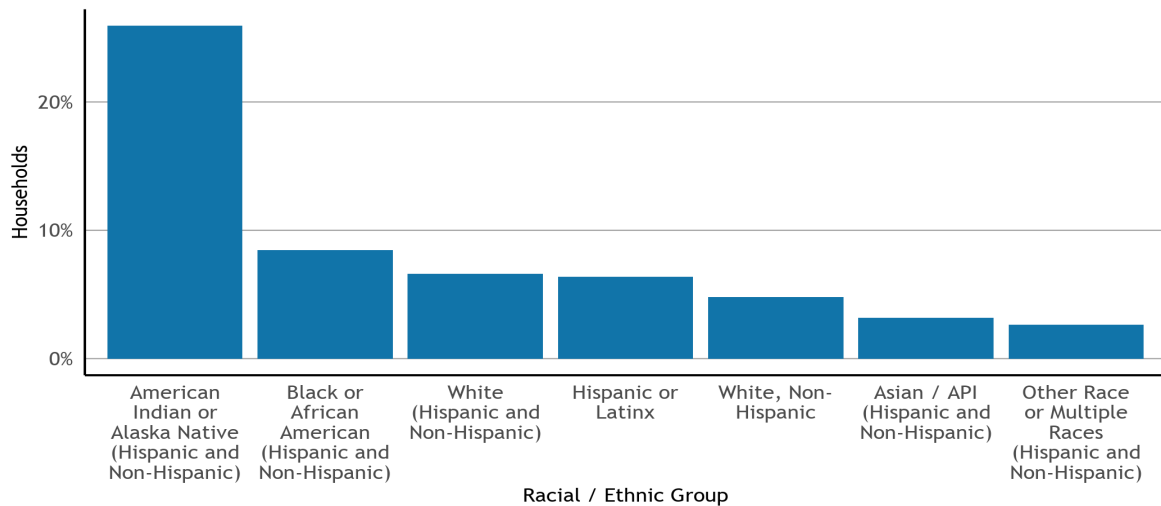


Figure 2-5 Poverty Status by Race

Universe: Population for whom poverty status is determined

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B17001(A-I).

⁶ Bohn, S. et al. 2020. Income Inequality and Economic Opportunity in California. *Public Policy Institute of California*.

⁷ Moore, E., Montojo, N. and Mauri, N., 2019. Roots, Race & Place: A History of Racially Exclusionary Housing the San Francisco Bay Area. *Hass Institute*.

E. HOUSING TENURE

The number of residents who own their homes compared to those who rent their homes can help identify the level of housing insecurity – ability for individuals to stay in their homes – in a city and region. Generally, renters may be displaced more quickly if prices increase. In San Bruno there are a total of 15,063 housing units, and fewer residents rent than own their homes: 41% versus 59% (Figure 2-6). This trend is similar in the overall region where 40% of San Mateo County households and 45% of Bay Area households rent their homes.

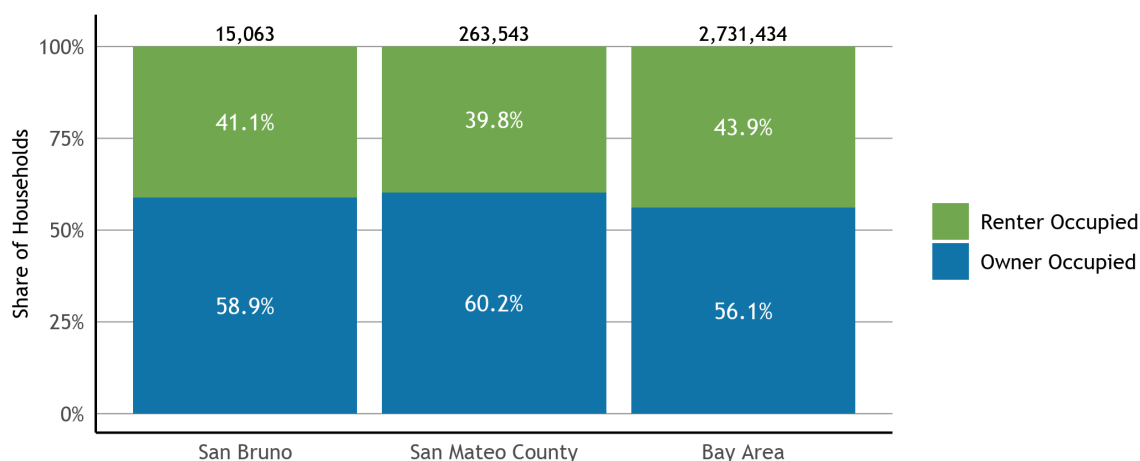


Figure 2-6 Housing Tenure

Universe: Occupied housing units

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25003.

Table 2-6 compares the City of San Bruno distribution of owner and renter housing in 2000 and 2011 and 2019 with San Mateo County and the Bay Area. The proportion of homeowners to renters in San Bruno, San Mateo County and the Bay Area has remained relatively stable over the last two decades.

TABLE 2-6 TENURE OF HOUSING (2000, 2011 AND 2019)

		City of San Bruno	San Mateo County	Bay Area
2000	Percent Owners	63%	61%	58%
	Percent Renters	37%	39%	42%
2011	Percent Owners	58%	59%	56%
	Percent Renters	42%	41%	43%
2019	Percent Owners	59%	60%	56%
	Percent Renters	41%	40%	44%

Source: 2010 US Census SF1, 2009-2011 American Community Survey.

Homeownership rates often vary considerably across race/ethnicity in the Bay Area and throughout the country. These disparities not only reflect differences in income and wealth but also stem from federal, state, and local policies that limited access to homeownership for communities of color while facilitating homebuying for white residents. While many of these policies, such as redlining, have been formally



disbanded, the impacts of race-based policy are still evident across Bay Area communities.⁸ In San Bruno, 35% of Black households owned their homes, while homeownership rates were 60% for Asian households, 64% for White households and 52% for Latino households (Figure 2-7).

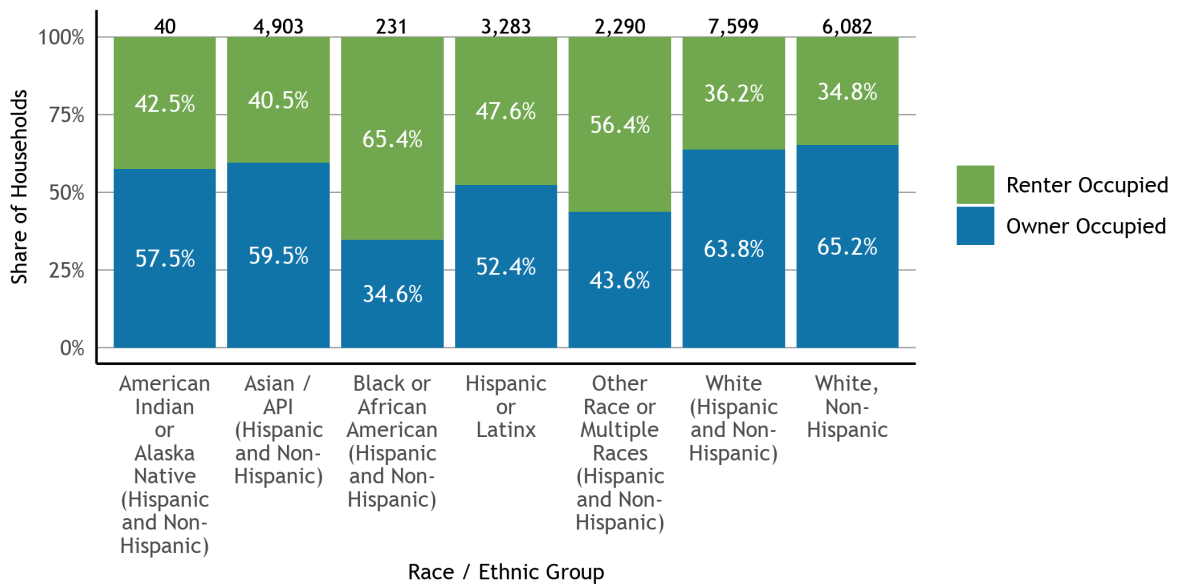


Figure 2-7 Housing Tenure by Race of Householder

Universe: Occupied housing units

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25003(A-I).

F. TENURE BY INCOME AND POVERTY

Throughout the region, there are disparities between the incomes of homeowners and renters. Typically, the number of low-income renters greatly outpaces the amount of housing available that is affordable for these households. Because of the high cost of housing for both renters and homeowners in the Bay Area, San Mateo County, and San Bruno, most renters and homeowners earn above 100% AMI to afford housing at all (\$149,600 for a family of four) (Figure 2-8). Specifically, 49% of owner-occupied housing units and 33% of renter occupied housing units in San Bruno are occupied by households that earn more than 100% of AMI. In San Bruno, low-income households that are below 80% AMI are just as likely to include renters as well as homeowners. However, lower income renters are more likely to be impacted when rents increase due to their income and the limited availability of choices in the rental housing market. There are 2,023 extremely low-income households in San Bruno. Of these, 893 are owner-occupied and 1,130 renter-occupied extremely low-income households. Fifty-six percent of extremely low-income households are renter-occupied and 44% are owner-occupied. Local jurisdictions are required to provide an estimate for their projected extremely low-income households. San Bruno projects that the city's extremely low-income households will be 50% of its very low-income RHNA or 352 housing units over the next housing element cycle.

⁸ See, for example, Rothstein, R. (2017). *The color of law: a forgotten history of how our government segregated America*. New York, NY & London, UK: Liveright Publishing.

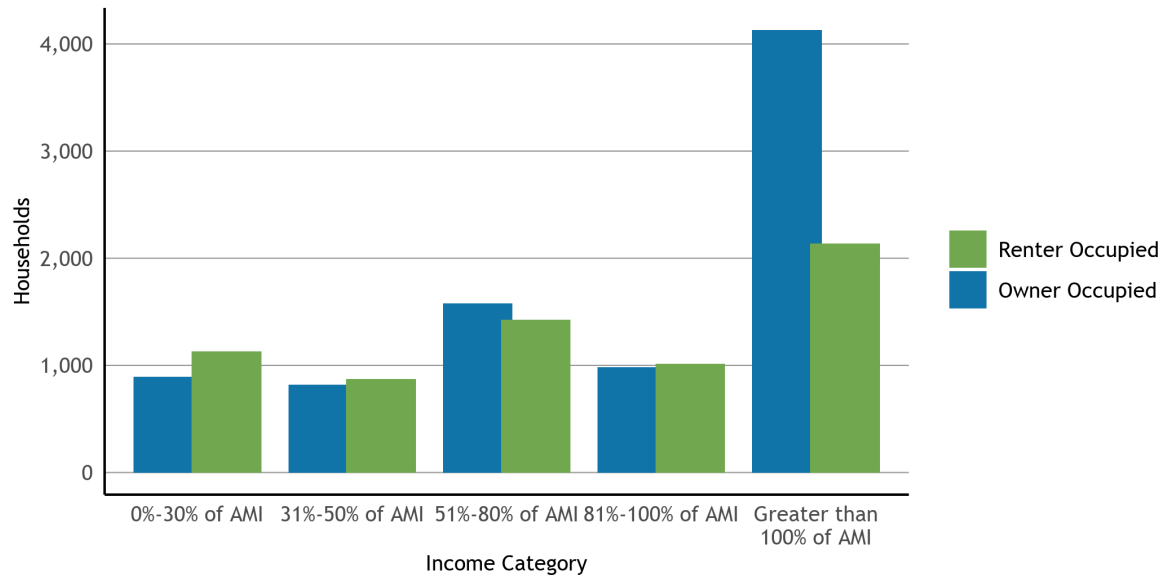


Figure 2-8 Household Income Level by Tenure

Universe: Occupied housing units

Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release.

The age of residents who rent or own their home can also signal the housing challenges a community is experiencing. Younger households tend to rent and may struggle to buy a first home in the Bay Area due to high housing costs. At the same time, senior homeowners seeking to downsize may have limited options in an expensive housing market. In San Bruno, 62% of householders between the ages of 25 and 44 are renters, while only 17% of householders 65-74 are renters (see Figure 2-9).

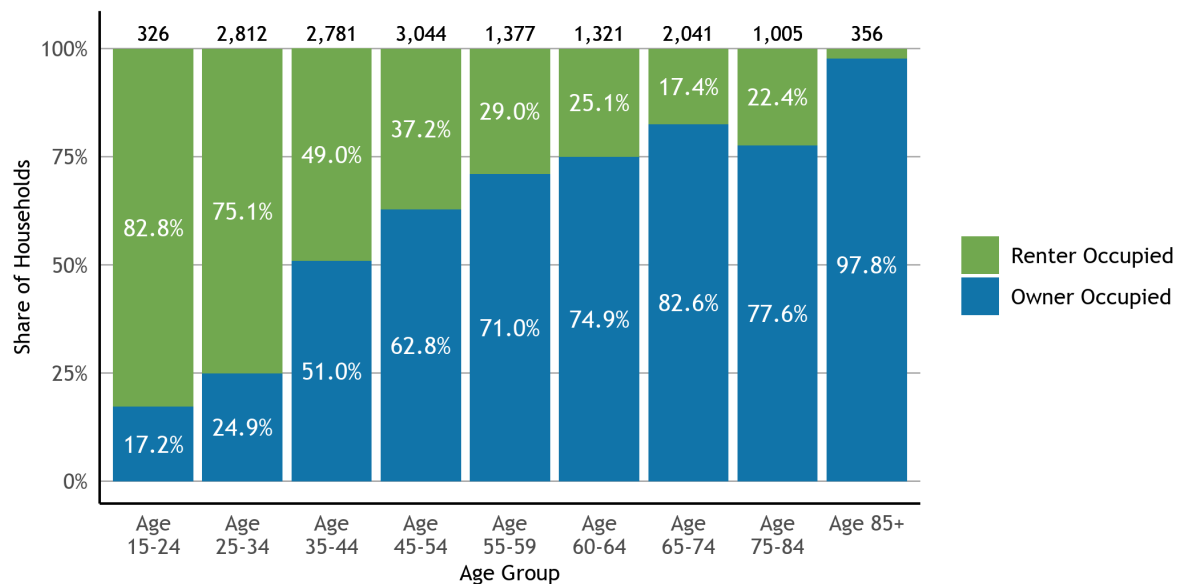


Figure 2-9 Housing Tenure by Age

Universe: Occupied housing units

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25007.



In many cities, homeownership rates for households in single-family homes are substantially higher than the rates for households in multi-family housing. In San Bruno, 83% of households in detached single-family homes are homeowners, while 19% of households in multi-family housing are homeowners (Figure 2-10).

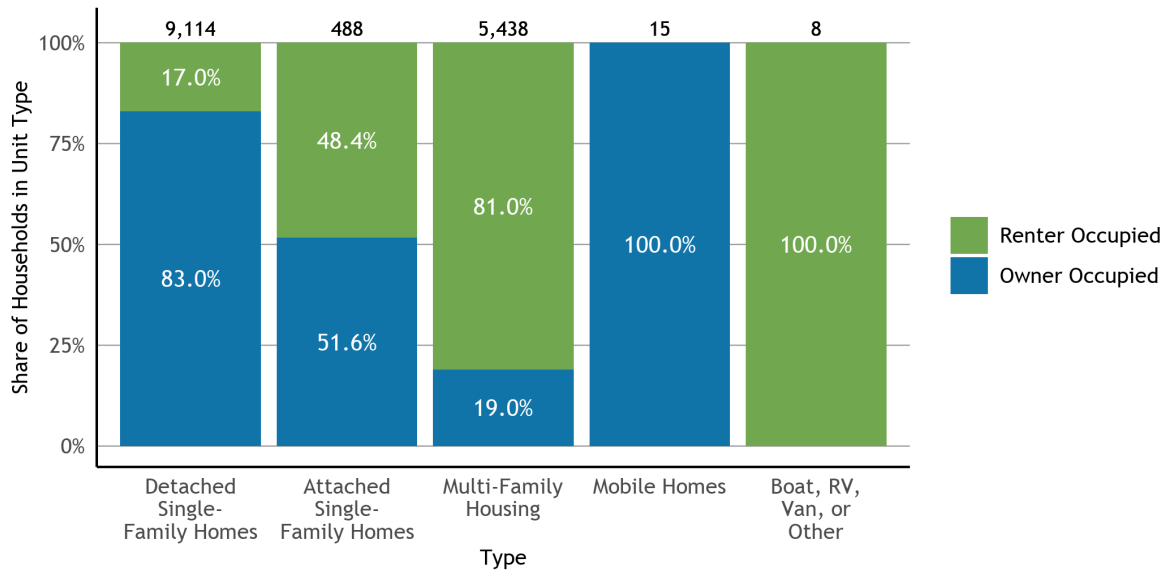


Figure 2-10 Housing Tenure by Housing Type

Universe: Occupied housing units

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25032.

KEY POINTS: INCOME, TENURE AND POVERTY

- Almost half San Bruno's households are lower income (45%).
- In San Bruno, 42 percent of households earn more than 100 percent AMI and 14 percent make less than 30 percent of AMI, which is considered extremely low-income. Similar trends occur regionally.
- Many households fall into lower AMI categories due to relatively stagnant wages in many industries. Despite the economic and job growth experienced throughout the region since 1990, the income gap has continued to widen.
- In San Bruno, American Indian or Alaska Native (Hispanic and Non-Hispanic) residents experience the highest rates of poverty, followed by Black or African American (Hispanic and Non-Hispanic) residents.
- In San Bruno fewer residents rent than own their homes: 41 percent versus 59 percent. This trend is similar in the overall region and has remained stable over the last two decades.
- In San Bruno, 35 percent of Black households, 60 percent of Asian households, 64 percent of White households and 52 percent for Latinx households owned their homes. These disparities reflect differences in income and wealth stemming from federal, state, and local policies that limited access to homeownership for communities of color while facilitating homebuying for white residents. While many of these policies, such as redlining, have been formally disbanded, the impacts of race-based policy are still evident across Bay Area communities.
- Low-income households that are below 80 percent AMI are just as likely to include renters as well as homeowners, but lower income renters are more likely to be impacted when rents increase due to their income and the limited availability of choices in the rental housing market.
- In San Bruno, 83 percent of households in detached single-family homes are homeowners, while 19 percent of households in multi-family housing are homeowners.

G. HOUSING

1. HOUSING UNITS

According to California Department of Finance (DOF) estimates, San Bruno had a total of 16,159 housing units as of 2019, which is a 5% increase since 2010 (Table 2-7).

TABLE 2-7 TOTAL HOUSING UNITS (2000, 2010, AND 2019)

	City of San Bruno		San Mateo County		Bay Area	
	Number	% Change	Number	% Change	Number	% Change
2000	14,980		260,576		2,552,402	
2010	15,356	2.5%	271,031	4.0%	2,785,948	9.2%
2019	16,159	5.2%	277,773	2.5%	2,904,094	4.2%

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25002 and California Department of Finance, E-5 series.

Production has not kept up with housing demand for several decades in the Bay Area, as the total number of units built and available has not yet come close to meeting the population and job growth experienced throughout the region. In San Bruno, the largest proportion of the housing stock was built 1940 to 1959, with 6,203 units constructed during this period (Figure 2-11). Since 2010, 2.4% of the current housing stock was built, a total of 379 units.

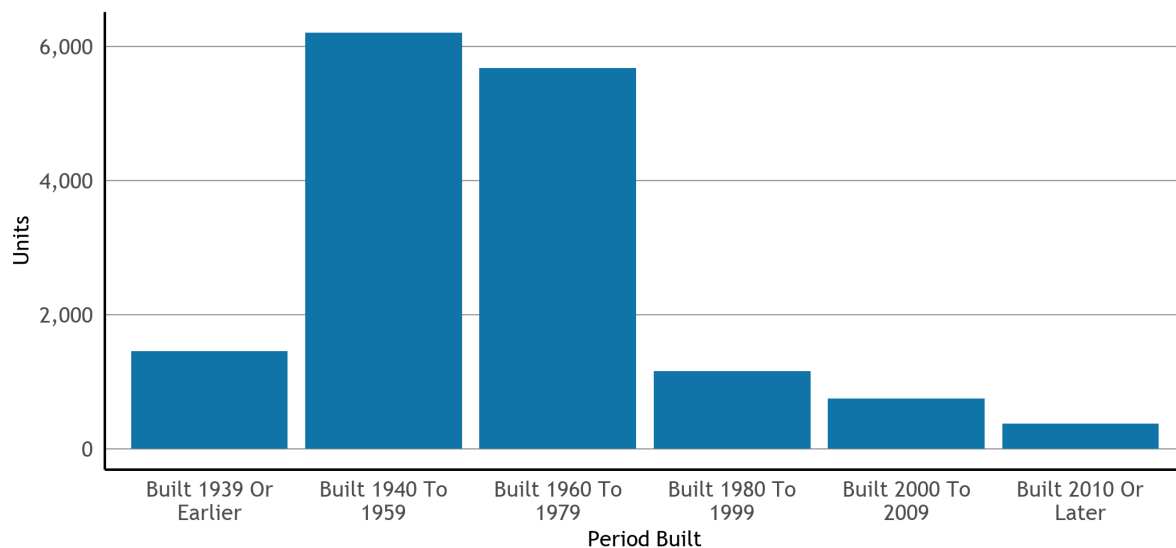


Figure 2-11 Housing Units by Year Structure Built

Universe: Housing units

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25034.

The chart below shows the distribution of housing units by residential building type in San Bruno in 2010 and 2020 (Figure 2-12). The housing stock of San Bruno in 2020 was primarily made up of single-family detached buildings (56%). Another 35% of the housing stock are multi-unit buildings of five units or more. The remaining housing stock include 6% multi-family homes with 2 to 4 units, and 4% single-family attached



homes such as townhouses and condos. In San Bruno, the housing type that experienced the most growth between 2010 and 2020 was multi-unit buildings of five units or more.

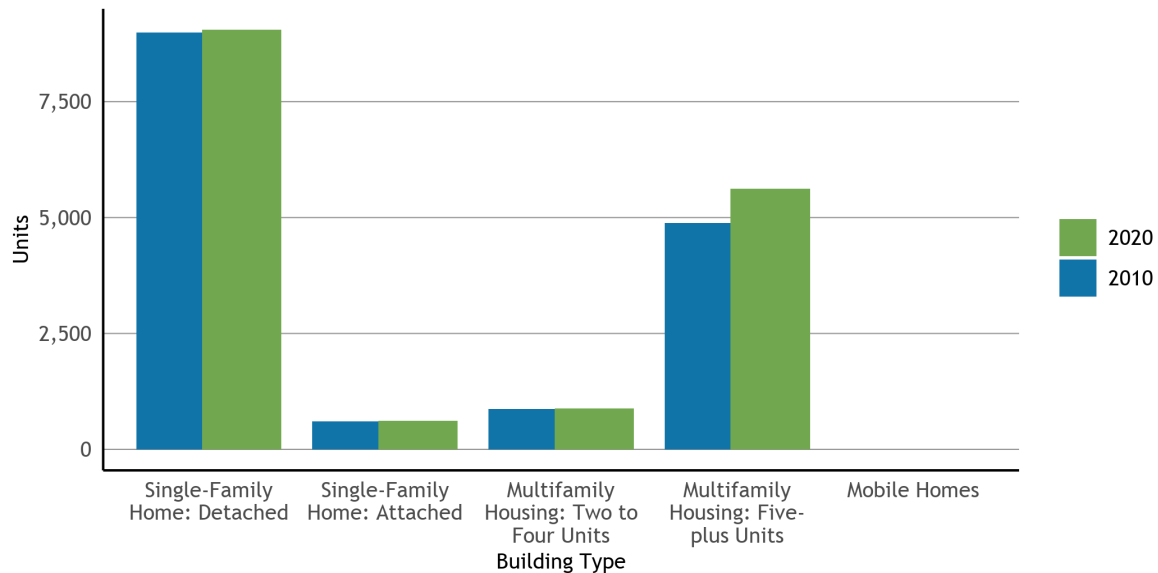


Figure 2-12 Housing Type Trends

Universe: Housing units

Source: California Department of Finance, E-5 series.

2. HOUSING OCCUPANCY

The demand for both rental and ownership housing in San Bruno, San Mateo County and the Bay Area is strong. According to American Community Survey (2015-2019), the vacancy rate in San Bruno for owner-occupied homes was just about 1%, and the vacancy rate for rentals was 3.9%. Vacant units make up 3.7% of the overall housing stock in San Bruno (Table 2-8).⁹

TABLE 2-8 OVERALL OCCUPANCY STATUS AND VACANCY RATES

	Occupied Housing Units	Vacant Housing Units	Total Housing Units	Vacancy Rate
San Bruno	15,063	571	15,634	3.7%
San Mateo County	263,543	14,230	277,773	5.1%
Bay Area	2,731,434	172,660	2,904,094	5.5%

Universe: Housing Units

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25002.

A housing market with a vacancy rate under 5% is considered to be tight and contributes to concerns about overcrowding, housing availability and choice, and housing affordability. The recent increases in rents and construction of new rental housing in San Mateo County are indicative of the high demand for rental housing relative to the supply of available rental units. In the Bay Area, the vacancy rate *excluding* units used for

⁹ The vacancy rates by tenure are for a smaller universe than the total vacancy rate reported in Table 2-8 which includes the full stock (4%). The vacancy by tenure counts are rates relative to the rental stock (occupied and vacant) and ownership stock (occupied and vacant) – but exclude a significant number of vacancy categories, including the numerically significant *other vacant*.

recreational or occasional use, and units classified as *other vacant*, is actually 2.6% of the total housing units that are listed for rent.¹⁰ In a region with a thriving economy and housing market like the Bay Area, units being renovated/repared and prepared for rental or sale are likely to represent a large portion of the “other vacant” category. Additionally, the need for seismic retrofitting in older housing stock could also influence the proportion of “other vacant” units in some jurisdictions.¹¹ Figure 2-13 shows a large proportion of vacant units in the region are categorized as “other vacant”, with 34% in San Bruno, 28% in San Mateo County and 36% in the Bay Area.

Out of the 571 vacant units in San Bruno, almost half or 251 units (44%) are “for rent” and only 6.5% or 37 are “for sale.” In the Bay Area and the county, there is a much larger proportion of vacant units that are listed as “Seasonal, Recreational or Occasional Use” (22% and 23% compared to only 7% in San Bruno). The region also has far fewer vacant units listed for rent than San Bruno, with only 24% in the Bay Area and 31% in San Mateo County listed for rent compared to 44% in San Bruno (Figure 2-13).

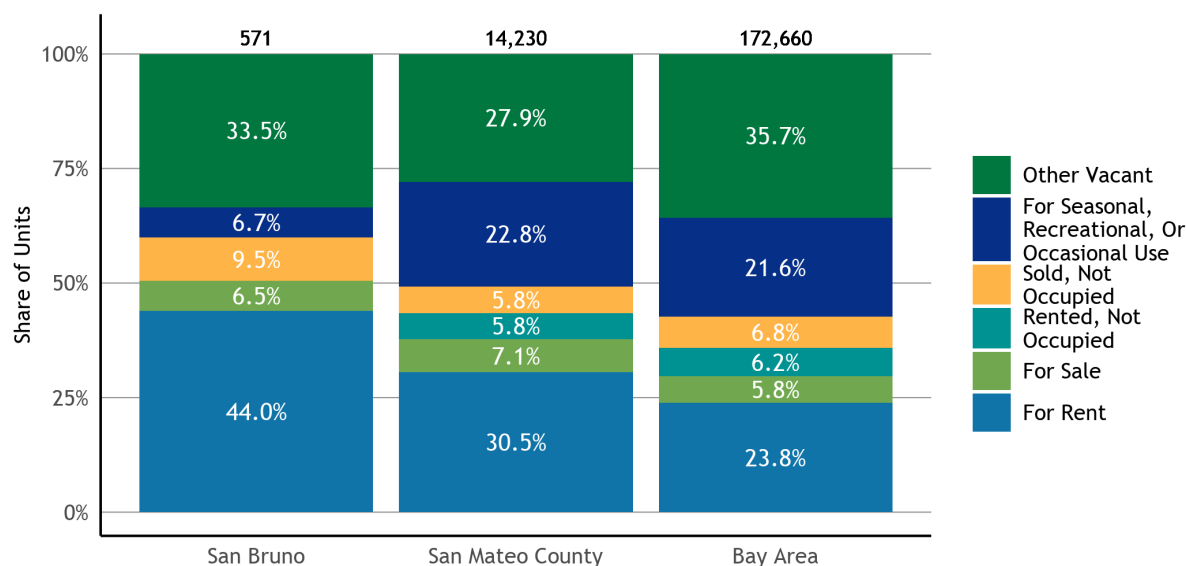


Figure 2-13 Vacant Units by Type

Universe: Vacant housing units

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25004.

Most of the occupied households in San Bruno are married-couple family households (53%), followed by single-person households (25%) (male or female), female-headed family household (10%) and male-headed family household (5%) (Figure 2-14). Households headed by one person are often at greater risk of housing insecurity, particularly female-headed households, who may be supporting children or a family with only one income. Of all family households in San Bruno (married, female-headed and male-headed households) 46% are households with children (Table 2-9).

¹⁰ The Census Bureau classifies vacant units as “for recreational or occasional use” are those that are held for short-term periods of use throughout the year such as vacation rentals and short-term rentals like AirBnB. The Census Bureau classifies units as “other vacant” if they are vacant due to foreclosure, personal/family reasons, legal proceedings, repairs/renovations, abandonment, etc. For more information, see definitions prepared by the Census Bureau: <https://www.census.gov/housing/hvs/definitions.pdf>.

¹¹ See Dow, P., 2018. Unpacking the Growth in San Francisco’s Vacant Housing Stock: Client Report for the San Francisco Planning Department. University of California, Berkeley.



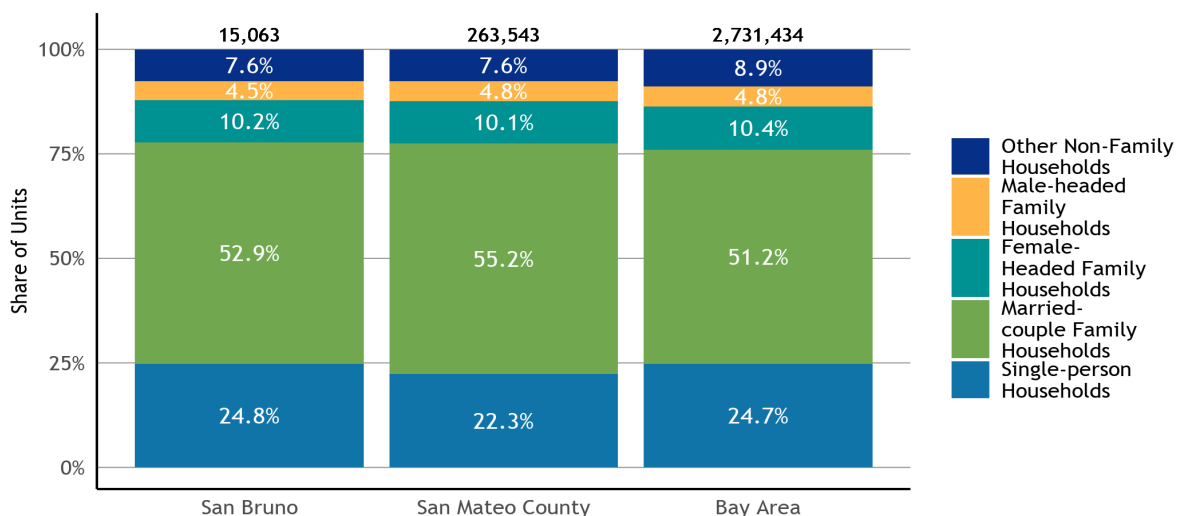


Figure 2-14 Household Type

Universe: Households

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B11001.

TABLE 2-9 FAMILY HOUSEHOLDS WITH CHILDREN

	Family Households with 1 or More Children Under 18	Total Family Households	Total Households (Includes Single & Other)
San Bruno	4,668 (46%)	10,183	15,063
San Mateo County	86,818 (47%)	184,744	263,543
Bay Area	873,704 (48%)	1,813,672	2,731,434

KEY POINTS: HOUSING UNITS AND OCCUPANCY

- San Bruno had a total of 16,159 housing units as of 2019, which is a 5% increase since 2010. Production has not kept up with housing demand for several decades in the Bay Area, as the total number of units built and available has not yet come close to meeting the population and job growth experienced throughout the region.
- In San Bruno, the housing type that experienced the most growth between 2010 and 2020 was Multifamily Housing: Five-plus Units.
- The housing stock of San Bruno in 2020 was primarily made up of single-family detached buildings (56%) and multi-unit buildings of 5 units or more (35%).
- Despite the dominance of single family and multi-unit buildings of 5 units or more, policymakers are interested in “missing middle housing” – including duplexes, triplexes, townhomes, cottage clusters and accessory dwelling units (ADUs). These housing types may open more options across incomes and tenure, from young households seeking homeownership options to seniors looking to downsize and age-in-place.
- Out of the 571 vacant units in San Bruno in 2019, almost half or 251 units (44%) are “for rent” and only 6.5 percent or 37 are “for sale.”
- In the Bay Area and the county 22 percent and 23 percent of vacant units are listed as “Seasonal, Recreational or Occasional Use” compared to only 7% in San Bruno. The county and region have fewer vacant units listed as “for rent” rent than San Bruno, with only 24% in the Bay Area and 31% in San Mateo County and 44% in San Bruno.
- Households headed by one person are often at greater risk of housing insecurity, particularly female-headed households who may be supporting children or a family with only one income. Ten percent of households in San Bruno are female-headed family households.

H. EMPLOYMENT AND UNEMPLOYMENT

San Bruno is largely a residential city, with approximately 16,500 jobs located in the city, or approximately one job for every three residents. Thirty-seven percent of jobs in San Bruno pay more than \$75,000 a year or more and 63% of jobs pay less than \$75,000 annually.¹² Between 2006 and 2009, the number of jobs located in San Bruno dipped below 12,000 jobs from a peak of 16,000 in 2002 (Figure 2-15). Since 2010, the number of jobs located in San Bruno has continued to increase as San Bruno recuperated the job losses of the previous decades' economic recession. Between 2010 and 2018, the economic recovery due in part to rapid growth in the technology industry, resulted in an additional 4,440 jobs in San Bruno or (37% increase). San Bruno's fastest growing industries during this time-period are Professional & Managerial Services and Information Services and one of the slowest was Retail, with 0% growth between 2010 and 2018. Job growth has been strong, although cyclical, over the past 10 years, with a slight dip leading into the pandemic but is projected to continue its upward trajectory.

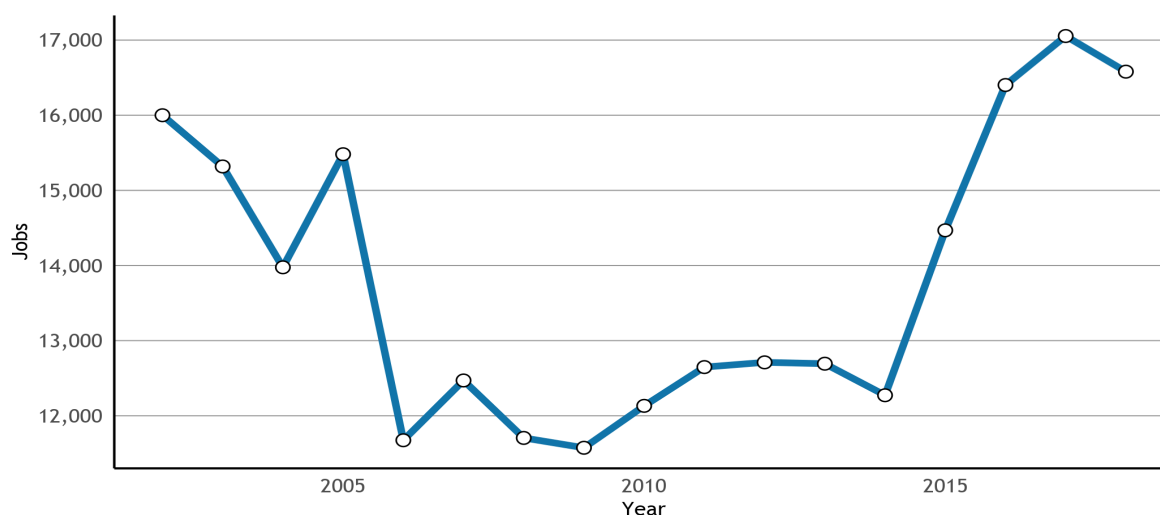


Figure 2-15 Jobs in a Jurisdiction

Universe: Jobs from unemployment insurance-covered employment (private, state and local government) plus United States Office of Personnel Management-sourced Federal employment.

Source: U.S. Census Bureau, Longitudinal Employer-Household Dynamics, Workplace Area Characteristics (WAC) files, 2002-2018.

San Bruno's unemployment rate is similar to the unemployment rate for the region and the state. The unemployment rate reached its nadir in April 2020 at the beginning of the COVID-19 Pandemic and climbed steadily since. The unemployment rate in the San Bruno area has largely improved since the height of the pandemic, in January 2022, San Bruno's unemployment rate was 3.5%.

¹² Source: U.S. Census Bureau, American Community Survey 5-Year Data 2015-2019, B08119, B08519.



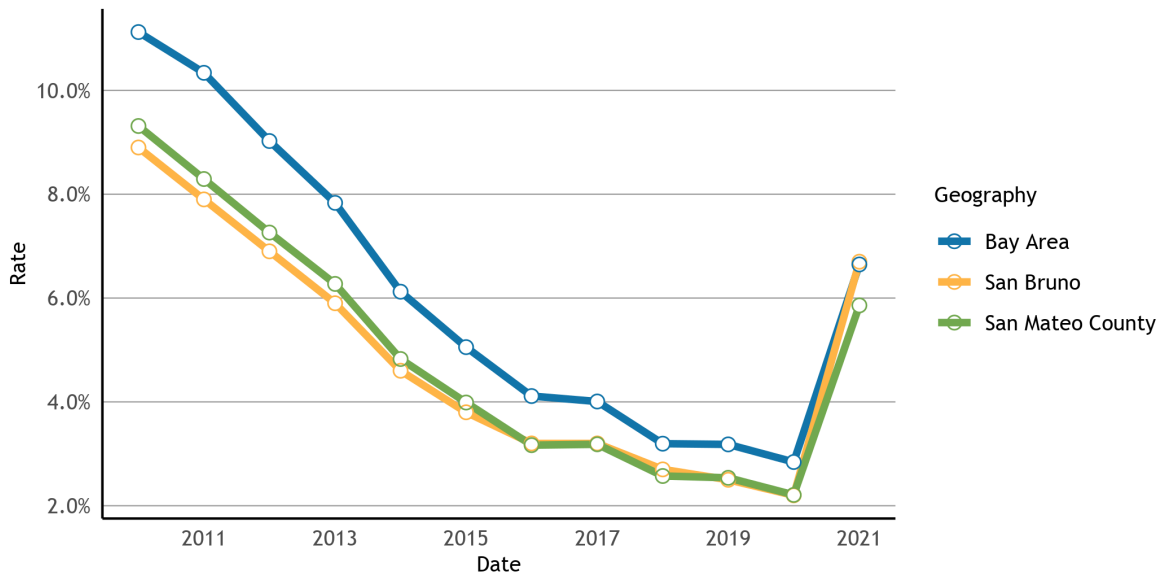


Figure 2-16 Unemployment Rate

Universe: Civilian noninstitutional population ages 16 and older.

Source: California Employment Development Department, Local Area Unemployment Statistics (LAUS), Sub-county areas monthly updates, 2010-2021.

I. INDUSTRY SECTOR COMPOSITION

1. JOBS AT SAN BRUNO JOB SITES

There are 16,229 jobs located at San Bruno job sites.¹³ Jobs located in the City of San Bruno are primarily jobs in Professional & Managerial Services industry (28%), and Arts, Recreation and Other Services (18%), and Health & Educational Services (16%), together representing more than 60% of all jobs in San Bruno. The remaining jobs are in Retail (15%), Information Services (11%), Manufacturing and Wholesale (3%) and Transportation and Utilities (3%), Financial and Leasing (3%), Government (2%) and Construction (2%). While Information Services makes up only 11% of all San Bruno Jobs, the industry grew by 721% between 2010 and 2018, from 215 to 1,765 jobs (an additional 1,550 new jobs). Jobs in the city's Information Services and Professional & Managerial Services are largely related to the technology industry.¹⁴ San Bruno's top employers include YouTube (2,565 employees), Walmart (2,000 employees), Skyline College (402 employees), Artichoke Joe's Casino (384 employees), City of San Bruno (232 employees), San Bruno Park School District (215 employees), Target (208 employees), Lucky Supermarkets (188 employees), Lowe's (170 employees), and Church of the Highlands (100 employees).¹⁵

2. JOBS HELD BY SAN BRUNO RESIDENTS

There are 24,082 employed residents in San Bruno who work at multiple locations across jurisdictional lines. The composition of the industry sectors where San Bruno residents are employed mirrors the composition of

¹³ Employed *residents* in a jurisdiction is counted by place of residence (they may work elsewhere) while *jobs* in a jurisdiction are counted by place of work (they may live elsewhere).

¹⁴ Source: U.S. Census Bureau, Longitudinal Employer-Household Dynamics, Workplace Area Characteristics (WAC) files, 2002-2018.

¹⁵ City of San Bruno Annual Comprehensive Financial Reports for the Fiscal Year Ended June 30, 2021

the industry sectors regionally. Most Bay Area, San Mateo County and San Bruno residents work in Health & Educational Services (Figure 2-17) followed by Financial & Professional Services.

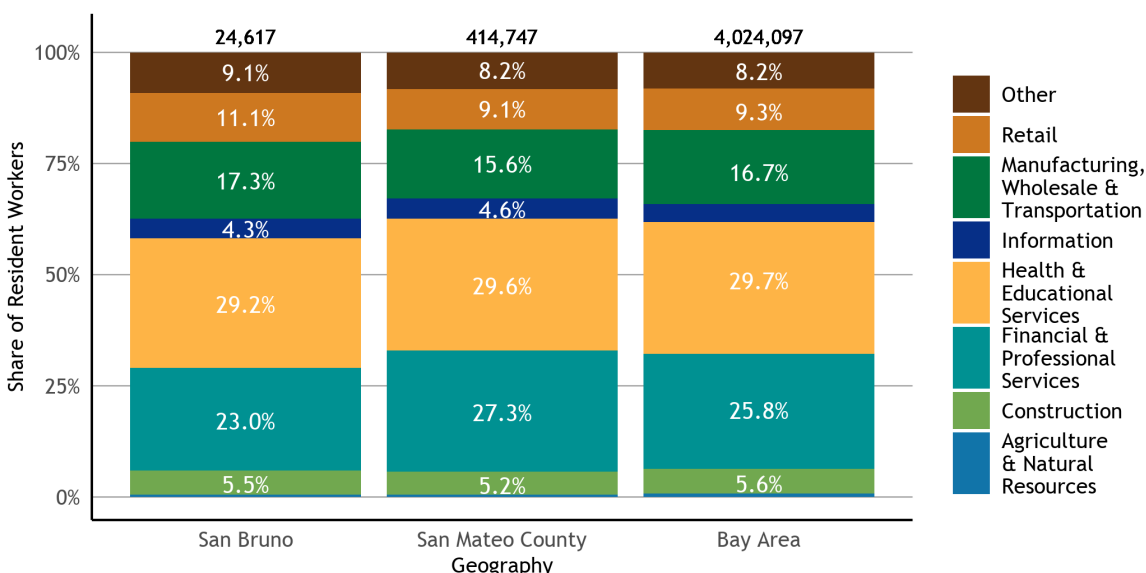


Figure 2-17 Resident Employment by Industry

Universe: Civilian employed population age 16 years and over.

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table C240304.

J. BALANCE OF JOBS AND WORKERS

San Bruno houses approximately 24,000 *employed residents (workers)* who either work in San Bruno or work elsewhere in the region. San Bruno has job sites that provide *jobs* to 16,000 workers who are either San Bruno residents or workers who commute to San Bruno from other cities.¹⁶ A city with a surplus of *employed residents (workers)* “exports” workers to other parts of the region, while a city that has a surplus of *jobs* must conversely “import” workers to its job sites. The ratio of *jobs* to *employed residents* (or workers) is 0.67; therefore, San Bruno is a *net exporter of workers*. Figure 2-17 shows that in San Bruno, there are more *employed residents (workers)* labeled “Place of Residence” (~24,000), than *jobs* labeled “Place of Work” (~16,000) in *every wage group* indicating that San Bruno is a *net exporter of workers in all wage groups*. Smaller cities like San Bruno typically will have fewer jobs within the city limits and residents will commute to other areas for employment. Surpluses of workers in a wage group relative to jobs means the community will export those workers to other jurisdictions. This dynamic can contribute to long commutes and traffic congestion.

Table 2-10 shows that 61% of San Bruno’s employed residents earn less than \$75,000 annually, significantly less than the AMI. Similarly, 63% of jobs located at San Bruno job sites also pay less than \$75,000. Regardless of whether a person works in San Bruno or lives in San Bruno and commutes for work, ~60% of workers cannot cover the cost of living for a family of four (two adults and two children will need to earn \$150,620 a year, in 2021, to live and sustain themselves in San Mateo County).¹⁷ Such relationships may cast light on potentially pent-up demand for housing in particular price categories. When there is high demand for housing relative to supply, many workers may be unable to afford to live where they work. In San Bruno, these ratios

¹⁶ Employed *residents* in a jurisdiction is counted by place of residence (they may work elsewhere) while *jobs* in a jurisdiction are counted by place of work (they may live elsewhere).

¹⁷ Home - Self Sufficiency Standard.



indicate there is demand for housing options at prices that are affordable to households where individual workers make less than \$75,000 annually.¹⁸ These figures have implications when looking at the cost of living and income inequality in San Bruno.

TABLE 2-10 EMPLOYED RESIDENTS IN SAN BRUNO BY WAGE GROUP

Earnings Group	Employed Residents:	Jobs at San Bruno Job Sites		
Less than \$9,999	2,126		1,745	
\$10,000 to \$24,999	3,185	61%	2,143	63%
\$25,000 to \$49,999	4,894		3,686	
\$50,000 to \$74,999	4,554		2,636	
\$75,000 or more	9,323	39%	6,019	37%
Totals	24,082		16,229	

Source: U.S. Census Bureau, American Community Survey 5-Year Data 2015-2019, B08119, B08519.

Figure 2-18 compares San Bruno’s employed residents (workers) to the jobs located at San Bruno job sites over time, for different wage groups as a ratio—a value of 1 means that city job sites have the same number of jobs in a wage group as it has employed residents in that wage group. Values below indicate the jurisdiction will need to export workers for jobs in a given wage group. San Bruno has been a longtime net exporter of workers for all wage groups since 2005.

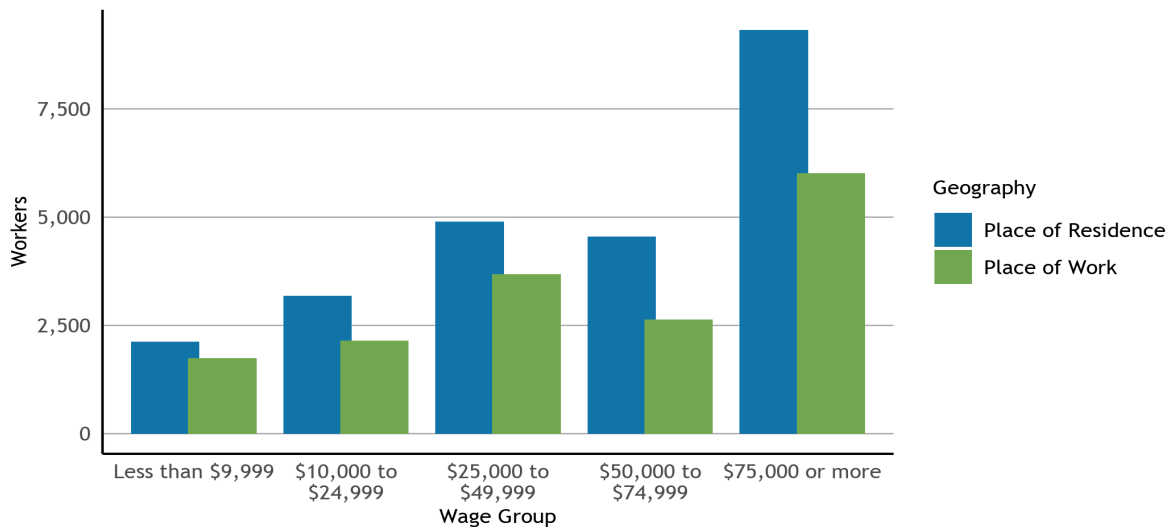


Figure 2-18 Employed Residents and Jobs in San Bruno by Wage Group

Universe: Workers 16 years and over with earnings.

Source: U.S. Census Bureau, American Community Survey 5-Year Data 2015-2019, B08119, B08519.

¹⁸ The source table is top-coded at \$75,000, precluding more fine grained analysis at the higher end of the wage spectrum.

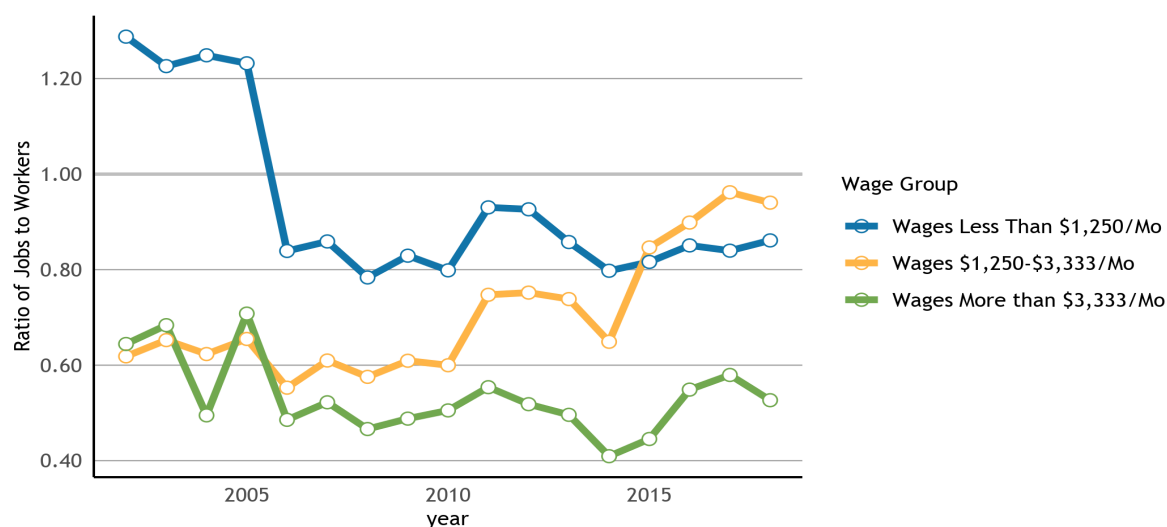


Figure 2-19 Jobs-Worker Ratios, By Wage Group

Universe: Jobs in a jurisdiction from unemployment insurance-covered employment (private, state, and local government) plus United States Office of Personnel Management-sourced Federal employment.

Source: U.S. Census Bureau, Longitudinal Employer-Household Dynamics, Workplace Area Characteristics (WAC) files (Jobs); Residence Area Characteristics (RAC) files (Employed Residents), 2010-2018.

Jobs-household ratio compares the number of jobs in an area to the number of occupied housing units in an area and is an indication of how the number of jobs (surplus or deficit) impacts housing availability. From 2004 to 2016, the jobs-household ratio in San Bruno was below 1.0, indicating fewer jobs as a proportion of occupied housing units and that housing units were available for the number of workers in the area. Beginning in 2016, the jobs-household surpassed 1.0 indicating a surplus of jobs for the number of occupied housing units, and that adequate housing may be more unaffordable or unavailable to workers in that area. Because of the cyclical nature of the jobs market, the jobs—household ratio remained relatively stable over time from 1.09 in 2002 to 1.07 jobs per household in 2018 (Figure 2-19).¹⁹ Figure 2-20 shows the Bay Area and San Mateo County jobs-household ratios consistently above 1.2 since 2005 and increasing upwards of 1.5 in recent years. This indicates that regionally, there has been a steady surplus of jobs for the number of occupied housing units for decades, and that adequate housing may be more unaffordable or unavailable to workers.

¹⁹ A similar measure is the ratio of jobs to housing units. However, this jobs-household ratio serves to compare the number of jobs in a jurisdiction to the number of housing units that are actually occupied. The difference between a jurisdiction's jobs-housing ratio and jobs-household ratio will be most pronounced in jurisdictions with high vacancy rates, a high rate of units used for seasonal use, or a high rate of units used as short-term rentals.

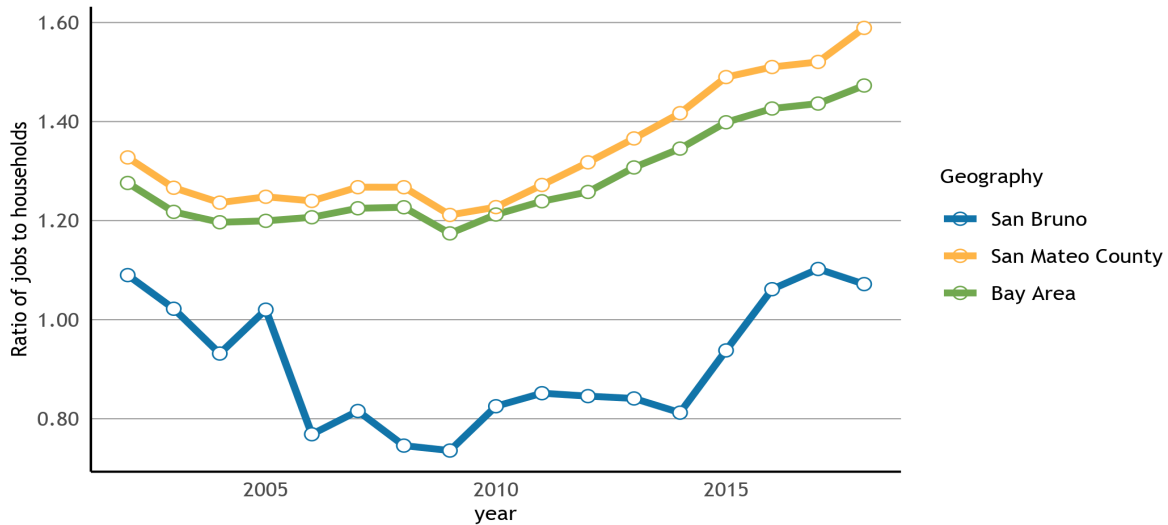


Figure 2-20 Jobs-Household Ratio

Universe: Jobs in a jurisdiction from unemployment insurance-covered employment (private, state and local government) plus United States Office of Personnel Management-sourced Federal employment; households in a jurisdiction.

Source: U.S. Census Bureau, Longitudinal Employer-Household Dynamics, Workplace Area Characteristics (WAC) files (Jobs), 2002-2018; California Department of Finance, E-5 (Households).

KEY POINTS: WORKFORCE, EMPLOYMENT AND INDUSTRY

- Though San Mateo County has a robust economy and low unemployment rate, various cost of living indexes show that much of its workforce cannot afford to live and sustain themselves in San Mateo County.
- Regardless of whether you live in San Bruno and commute or whether you work in San Bruno, approximately 60 percent of all workers earn less than \$75,000 annually.
- San Bruno's fastest growing industries are Professional & Managerial Services and Information Services largely attributed to the technology industry. One of the slowest was Retail, with zero percent growth between 2010 and 2018.
- San Bruno has been a net exporter of workers for all wage groups since 2005. Smaller cities like San Bruno typically will have fewer jobs within the city limits and hence export workers to other communities. This dynamic contributes to long commutes and traffic congestion. Without choices and the availability of affordable housing in San Bruno, lower-income people may choose to live elsewhere and commute into the city to work.
- In San Bruno the jobs-household ratio indicates that there is demand for housing options at prices that are affordable to households where individual workers make less than \$75,000 annually.
- While San Bruno, San Mateo County, and the Bay area, all have jobs-household ratios exceeding 1.0 today, San Bruno's ratio only exceeded 1.0 beginning in 2016. The region ratio has been over 1.2 for decades, indicating a longstanding surplus of jobs for the number of occupied housing units regionally and that adequate housing may be more unaffordable or unavailable.

K. RENTS AND RENTAL HOUSING AFFORDABILITY

Similar to home values, rents have also increased across the Bay Area in the last decade. Many renters have been priced out, evicted or displaced. Residents finding themselves in one of these situations may have had to choose between commuting long distances to their jobs and schools or moving out of the region. Since 2009,

the median rent has increased by 66% in San Bruno, from \$1,580 to \$2,240 per month (Figure 2-21).²⁰ In San Mateo County, the median rent has increased 41%, from \$1,560 to \$2,200. The median rent in the region has also increased significantly during this time from \$1,200 to \$1,850, a 54% increase.²¹

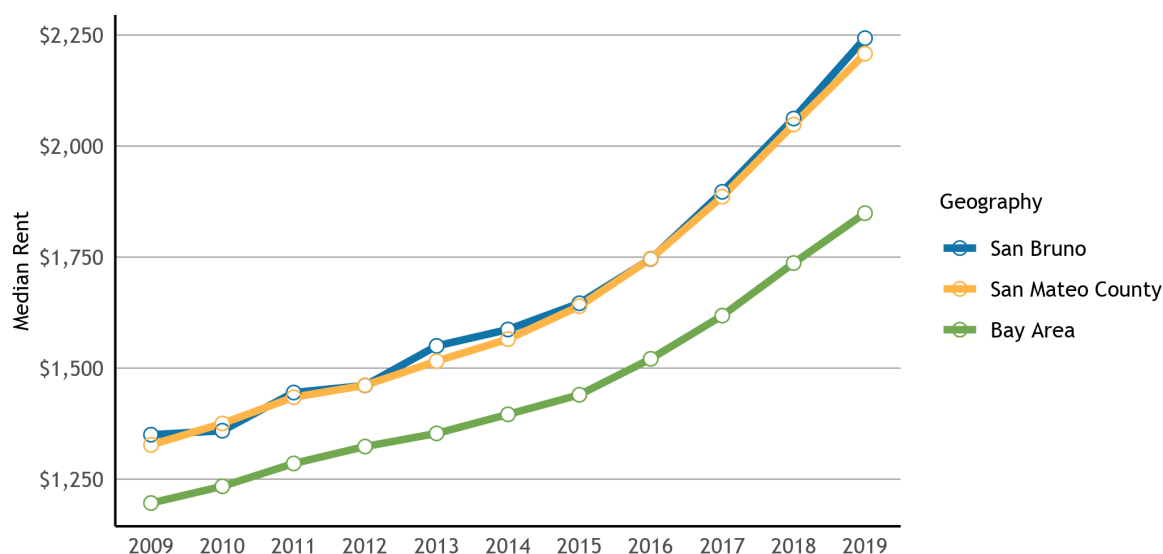


Figure 2-21 Median Contract Rent

Universe: Renter-occupied housing units paying cash rent.

Source: U.S. Census Bureau, American Community Survey 5-Year Data releases, starting with 2005-2009 through 2015-2019, B25058, B25056 (for unincorporated areas). County and regional counts are weighted averages of jurisdiction median using B25003 rental unit counts from the relevant year.

COVID-19-related economic contraction has led many renters to search for more affordable rental housing or, for those with the means and ability to work-from-home, to transition into homeownership in more affordable markets. The COVID-19 Pandemic and the subsequent shift to widescale remote work, has resulted in a rise in vacancy rates and a decline in rents in the region. According to a housing market analysis completed by HUD, between the third quarter of 2020 and the third quarter of 2019, the average apartment rent in San Mateo County declined by 10-percent.²² Prior to the recent decline, year-over-year rent growth had been positive since 2009.

Figure 2-22 shows the distribution of rentals at various prices in San Bruno, San Mateo County and the Bay Area. Between 2015 – 2019 most units in San Bruno rented between \$1,500 and \$2,500 per month, followed by units in the >\$2,500 per month price range. This trend is similar in San Mateo County and the Bay Area except that there are more units in the Bay Area priced below \$1,500 than in San Mateo County and San Bruno.

More recent rental data, shown in Table 2-11, indicates rents have only continued to increase in San Bruno. The data indicates rentals in San Bruno are only affordable to moderate-income households and above

²⁰ Note that contract rents may differ significantly from, and often being lower than, current listing prices.

²¹ While the data on home values shown in Figure 2-21 comes from Zillow, Zillow does not have data on rent prices available for most Bay Area jurisdictions. To have a more comprehensive dataset on rental data for the region, the rent data in this document comes from the U.S. Census Bureau's American Community Survey.

²² Comprehensive Housing Market Analysis for San Francisco-San Mateo-Redwood City, California: <https://www.huduser.gov/portal/publications/pdf/SanFranciscoSanMateoRedwoodCityCA-CHMA-20.pdf>



moderate-income households, with the largest rental units only affordable to above moderate-income households.

TABLE 2-11 MEDIAN RENTS IN OCTOBER 2022 – SAN BRUNO

Source	Studio	1 Bed	2 Beds	3 Beds	4/4+ Beds
Zumper	\$2,071	\$2,901	\$3,258	\$4,462	\$4,800
Zillow	\$2,100	\$2,400	\$3,250	\$4,500	**\$5,869
Rent.	\$2,195	\$2,935	\$3,507	\$4,821	N/A
Apartments.com	\$2,119	\$2,720	\$2,816	\$4,525	N/A
Average	\$2,121	\$2,739	\$3,208	\$4,577	N/A

**Zillow does not display rents for 4 bedrooms, it displays rents for 4+ bedrooms.

Source: Zumper: Average Rent in San Bruno, CA and Cost Information ZumperZillow: Average Rental Price in San Bruno, CA and Market Trends | Zillow Rental Manager | Rent.: Rental Market Trends & Average Rent in San Bruno, CA | Rent. Apartment.com: Apartments for Rent in San Bruno CA | Apartments.com: September 13, 2022.

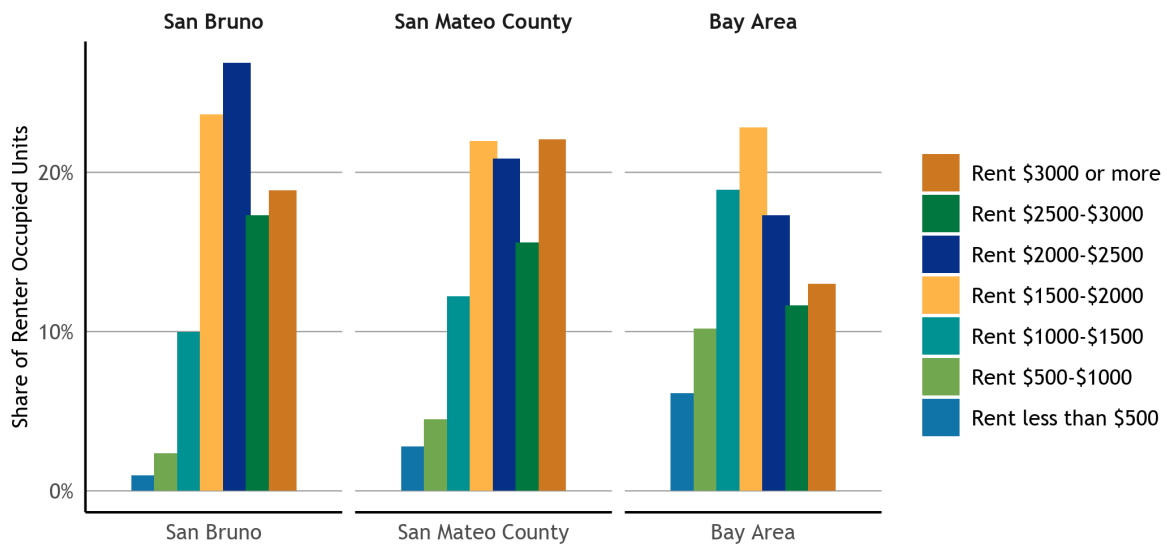


Figure 2-22 Contract Rents for Renter-Occupied Units

Universe: Renter-occupied housing units paying cash rent.

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25056.

Forty-five percent of households in San Bruno are extremely low-income, very low-income, or low-income (defined as earning less than 80% AMI) and may have difficulty competing for the limited number of rental units that are available at an affordable price. A single-person household earning 80% AMI (maximum of \$102,450), can afford a monthly rent of about \$2,560. A four-person household earning 80% AMI (\$146,350) can afford a monthly rent of about \$3,650. Average rents do not reflect the higher cost of units with additional bedrooms to accommodate larger families. Many workers in lower wage jobs such as retail, service, home healthcare, teaching, and childcare, may not be able to live in the community where they work. The

following chart from the California Housing Needs Partnership, shows that renters need to earn 3.2 times the minimum wage to afford the average asking rent in San Mateo County.²³

TABLE 2-12 2022 SAN MATEO MAXIMUM AFFORDABLE RENT PAYMENTS

Income Category	Maximum Affordable Rent Payment (\$)				
	Studio	1 BR	2 BR	3 BR	4 BR
Extremely Low ^a	\$978	\$1,048	\$1,258	\$1,454	\$1,622
Very Low ^a	\$1,631	\$1,748	\$2,097	\$2,423	\$2,703
High HOME Limit (65%) ^a	\$2,101	\$2,253	\$2,704	\$3,116	\$3,456
HERA Special Very Low (50% AMI) ^b	\$1,742	\$1,866	\$2,240	\$2,588	\$2,887
HERA Special Limit (60% AMI) ^b	\$1,091	\$2,240	\$2,688	\$3,106	\$3,465
Low ^c	\$2,610	\$2,797	\$3,356	\$3,878	\$4,326
HUD Fair Market Rent	\$2,115	\$2,631	\$3,198	\$4,111	\$4,473
Median ^c	\$3,262	\$3,496	\$4,194	\$4,846	\$5,406

^a Income figures provided by HUD for following San Mateo County federal entitlement programs: CDBG, HOME, ESG.

^b For San Mateo County, the Housing and Economic Recovery Act of 2008 (HERA) and the HUD 2010 HOME hold-harmless provision permit multi-family tax subsidy projects (MTSPs) and HOME projects placed in service before January 1, 2009 to continue to use HOME/tax credit/tax exempt bond rents based on the highest income levels that project ever operated under. Once these units are placed in service, the rents will not adjust downward should HUD establish lower incomes/rents in any subsequent year. Marketing of vacant units should be targeted to the current year's income schedule. However, HUD's Section 8 income limits are larger than those defined by Section 3009(a)(E)(ii) of HERA (Public Law 110-289). Therefore, for FY2018 no special income limits are necessary.

^c CA Tax Credit Rent Limits for Low- and Median-Income Group.

Notes (Generic): Maximum affordable rent based on 30% of monthly income and all utilities paid by landlord unless further adjusted by HUD. Utility allowances for tenant-paid utilities may be established by Housing Authority of County of San Mateo Section 8 Program. High HOME Limit rent set at lower of: (a) 30% of 60% AMI, or (b) FMR (HUD Fair Market Rent).

Household Size Assumptions: For purposes of calculating the maximum rents, the following household assumptions are made using the definitions in California Health and Safety Code Section 50053 and Section 50052.5. Studio: 1 person, 1-Bedroom: 2 persons, 2-Bedroom: 3 persons, 3-Bedroom: 4 persons, 4-Bedroom: 5 persons.

Source: San Mateo County Department of Housing.

L. RENTERS AND THE COVID-19 PANDEMIC

The emergence of the COVID-19 Pandemic added to the financial stress of renters who struggled to find housing that was affordable even before the pandemic began. Low-wage workers were already in a difficult financial position before state and local public health restrictions shut down parts of the economy in the spring of 2020, leaving many without jobs. Renters and low-income residents also tend to work in industries that were most affected by public health restrictions and closures such as retail, services, and healthcare. While the state economy has experienced a rebound since that time, pandemic-induced job loss added further financial stress to low-income households.

According to the California Legislatures Nonpartisan Fiscal and Policy Advisory Report (January 2021) more than half of California workers who lost their jobs are members of lower-income households (less than \$50,000 in annual earnings). During the height of the pandemic, the estimated unemployment rate for workers in lower-income households (15%) was five times higher than the estimated unemployment rate for workers in higher-income households (3%).²⁴ The report also highlights unprecedented actions of the state

²³ California Housing Partnership Housing Needs Dashboard: <https://chpc.net/housingneeds/>.

²⁴ How Has COVID-19 Affected Renters and Homeowners? Legislative Analyst's Office of the California Legislatures Nonpartisan Fiscal and Policy Advisory Report January 2021 (<https://lao.ca.gov/Publications/Report/4312>).



and federal governments to boost incomes and provide rental relief that have helped many households who otherwise would have faced eviction. The CA COVID-19 Rent Relief program, which provides rent relief to California landlords and renters who have faced financial hardships due to the COVID-19, provided almost \$70 million in rental assistance to San Mateo County renters and landlords and served more than 5,000 households in the county as of March 2022. Approximately 70% of households receiving CA COVID-19 rental relief in San Mateo County are considered extremely low-income earning less than 30% AMI.²⁵ The program no longer accepted applications after March 2022.

TABLE 2-13 WHO CAN AFFORD TO RENT IN SAN MATEO COUNTY

Average Asking Rent = \$2,631 / month

Income Needed to Afford Average Rent	\$50.60 / hour	\$8,770 / month
San Bruno Minimum Wage	\$14.00 / hour	\$2,422 / month
Home Health & Personal Care Aides	\$16.58 / hour	\$2,873 / month
Retail Salespersons	\$18.15 / hour	\$3,146 / month
Childcare Workers	\$18.31 / hour	\$3,174 / month
Janitors and Cleaners	\$20.31 / hour	\$3,521 / month
Medical Assistants	\$25.94 / hour	\$4,497 / month

Source: California Housing Partnership Housing Needs Dashboard: <https://chpc.net/housingneeds/>.

M. HOME PRICES AND SALES AFFORDABILITY

Home prices reflect a complex mix of supply and demand factors, including an area's demographic profile, labor market, prevailing wages and job outlook, coupled with land and construction costs. In the Bay Area, the costs of housing have long been among the highest in the nation. The typical home value in San Bruno was estimated at \$1,203,420 in December of 2020, per data from Zillow. In San Bruno, most homes cost between \$750k-\$1M and \$1M-\$1.5M (Figure 2-23). By comparison, the county has a significantly higher share of homes in the > \$1.5M price range than the Bay Area in general. The Bay Area has a much larger share of homes priced under \$500,000 than San Mateo County. The typical home value is \$1,418,330 in San Mateo County and \$1,077,230 in the Bay Area. San Mateo County has a lower share of homes priced under \$500,000, while San Bruno has slightly more units priced under \$500,000 than the county in general.

²⁵ California COVID-19 Rent Relief Program Dashboard – Housing Is Key.

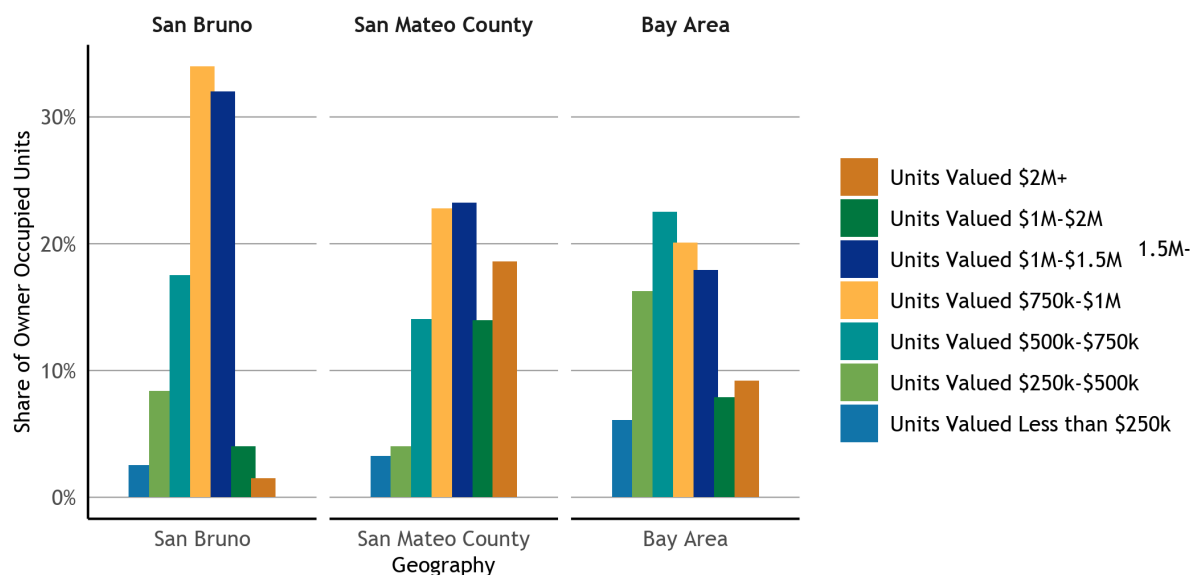


Figure 2-23 Home Values of Owner-Occupied Units

Universe: Owner-occupied units.

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25075.

The region's home values have increased dramatically since 2000, besides a temporary decrease during the Great Recession 2007-2011 (Figure 2-24). The rise in home prices has been especially steep since 2012. From 2010 to 2020, the typical single-family home value in San Bruno increased from \$549,000 to \$1,203,420. The Table 2-14 is from the San Mateo County Association of Realtors (SAMCAR) and show average and median single-family and condominium home prices between 2010 and the fourth quarter of 2021. The median and average prices of both single-family homes and condos in San Mateo County and the Bay Area increased by more than 100% from 2010 to 2021.²⁶ In San Bruno home and condo prices increased the most, with increases upwards of 150%.

TABLE 2-14 MEDIAN SINGLE-FAMILY AND CONDO SALES PRICES (2010, 2015, 2020 AND FOURTH QUARTER 2021)

	2010 Annual	2015 Annual	2020 Annual	Fourth Quarter of 2021	Actual / % Change (2010-2021)
San Bruno (Single-Family)	\$549,000	\$880,000	\$1,205,000	\$1,375,000	+\$826,000 / (+150%)
San Mateo County (Single-Family)	Avg. \$934,680	\$1,250,000	\$1,700,000	\$1,900,000	+\$965,320 / (103%)
San Bruno (Condo)	\$199,500	\$368,000	\$525,000	\$510,000	+\$310,500 / (156%)
San Mateo County (Condo)	Avg. \$449,467	\$702,000	\$925,000	\$900,000	+\$450,533 / (100%)

Source: <https://www.zillow.com/home-values/>, June 2022.

²⁶ In 2010, SAMCAR calculated average for San Mateo County totals and median for municipalities. In later years, median was calculated for both municipality and county indicators: Market Data (San Mateo County Association of REALTORS®) (samcar.org).



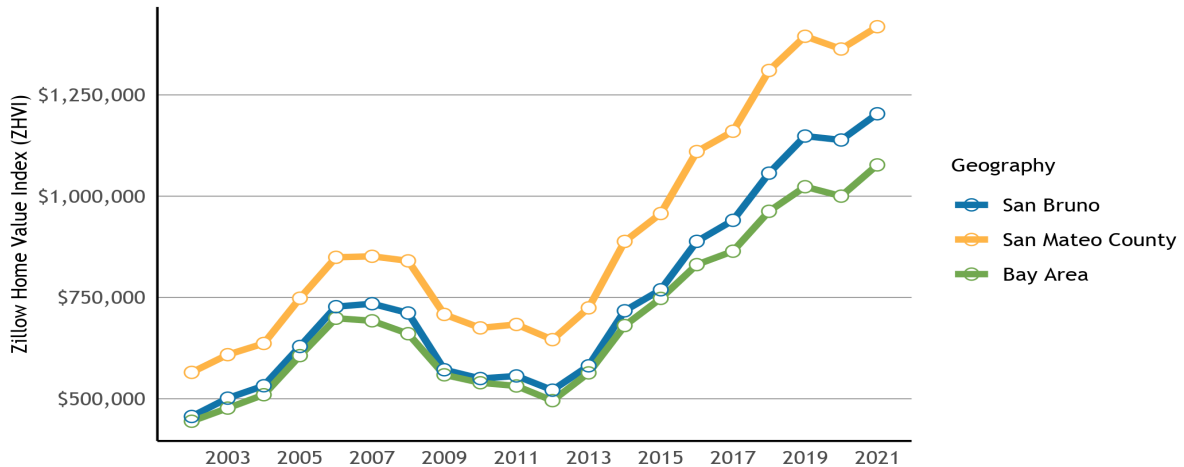


Figure 2-24 Zillow Home Value Index (ZHVI)

Universe: Owner-occupied housing units.

Source: Zillow, Zillow Home Value Index (ZHVI).

The impact of pursuing the collective programs (total programs) included under Goal 1 “Remove constraints to housing development and improve the development review process” (9 programs) and Goal 2 “Increase the availability of housing throughout the city, especially affordable housing” (13 programs) will help increase the availability of housing in the city, especially affordable housing, both rental and for-sale, as well as protect residents from displacement. Some of the impacts of these policies include lowering financing costs for affordable projects (Programs 1-C, 1-G, 2-F, 2-G, and 3-B), increasing density in transit corridors (Programs 2-A and 2-E) and increasing density in high resource residential areas (Programs 2-A, 2-D, 2-E, and 4-P). Programs 3-A, 3-G, 3-H and 3-I aim to help protect current residents from displacement and help mitigate the impacts of increasing rents and high cost of living. These programs explore the possibility of establishing an ordinance that provides for tenant and community first right of purchase or right of first refusal (TOPA and COPA) and also examine giving displaced residents preferential access to new affordable housing units.

KEY POINTS: HOUSING AFFORDABILITY FOR OWNERS AND RENTERS

- The median and average prices of both single-family homes and condos in San Mateo County and the Bay Area increased by more than 100 percent from 2010 to 2021. In San Bruno home and condo prices increased the most, with increases upwards of 150 percent.
- Like home values, rents have also increased across the Bay Area in the last decades. Many renters have been priced out, evicted or displaced.
- San Bruno’ workforce made up of forty-five percent of households who are extremely low-income, very low-income, or low income may have difficulty competing for the limited number of rental units that are available at an affordable price.
- The COVID-19 Pandemic and the subsequent shift to widescale remote work, has resulted in a rise in vacancy rates and small decline in rents in the region most recently. Prior to the recent decline, year-over-year rent growth had been positive since 2009.
- Renters and low-income residents also tend to work in industries that were most affected by public health restrictions. While the state economy has experienced a rebound since that time, pandemic-induced job loss added further financial stress to low-income households.
- Through the California COVID-19 Rent Relief program, almost \$70 million in rental assistance has been delivered to San Mateo County renters and landlords serving more than 5,000 households as of March 2022. Most of the households served are considered extremely low-income.

N. OVERPAYMENT AND COST-BURDENED HOUSEHOLDS

The U.S. Department of Housing and Urban Development considers housing to be affordable for a household if the household spends less than 30% of its income on housing costs. A household is considered “cost-burdened” if it spends more than 30% of its monthly income on housing costs, while those who spend more than 50% of their income on housing costs are considered “severely cost-burdened.” In San Bruno, 20% of households are cost burdened spending 30%-50% of their income on housing, while an additional 17% of households are severely cost burdened and use the majority of their income for housing. Low-income residents are the most impacted by high housing costs and experience the highest rates of cost burden. Spending such large portions of income on housing puts low-income households at higher risk of displacement, eviction, or homelessness.

Renters are more likely to be overpaying for housing than homeowners. While the housing market has resulted in home prices increasing dramatically, homeowners often have mortgages with fixed rates, whereas renters are more likely to be impacted by rental market increases. When looking at the cost burden across tenure in San Bruno, 19% of renters spend 30% to 50% of their income on housing and 25% of renters spend more than half of their income on housing (totaling 44% either cost burdened or severely cost burdened). For homeowners, 31% are either cost burdened or severely cost burdened (Figure 2-25). Households who live in San Bruno may live in overcrowded homes and have limited money to dedicate towards other necessities such as food, transportation, and medical care.

In the City of San Bruno there are a total of 5,549 cost burdened households (spending more than 30% of income for housing), 2,845 are owner-occupied and 2,704 are renter-occupied. Thirty-eight percent of all households in San Bruno are cost-burdened or severely cost-burdened, 32% of all owner-occupied households in San Bruno cost-burdened or severely cost-burdened households, and 44% of all renter-occupied households in San Bruno are cost-burdened or severely cost-burdened.

There are 2,580 occupied housing units in San Bruno that are considered severely cost-burdened (spending more than 50% of income for housing). Of these severely cost-burdened households, (1,049) are owner-occupied and (1,531) are renter-occupied. There are 2,960 occupied housing units in San Bruno that are considered cost burdened (spending between 30%-50% of income for housing). Of these cost-burdened households, (1,796) are owner-occupied and (1,173) are renter-occupied.

Figure 2-26 shows that 67% of San Bruno households making less than 30% of AMI spend the majority of their income on housing (severely cost-burdened). For San Bruno residents making more than 100% of AMI, just 1% are severely cost-burdened, and 91% of those making more than 100% of AMI spend less than 30% of their income on housing.

Currently, people of color are more likely to experience poverty and financial instability as a result of federal and local housing policies that have historically excluded them from the same opportunities extended to white residents. As a result, they often pay a greater percentage of their income on housing, and in turn, are at a greater risk of housing insecurity (Figure 2-27).



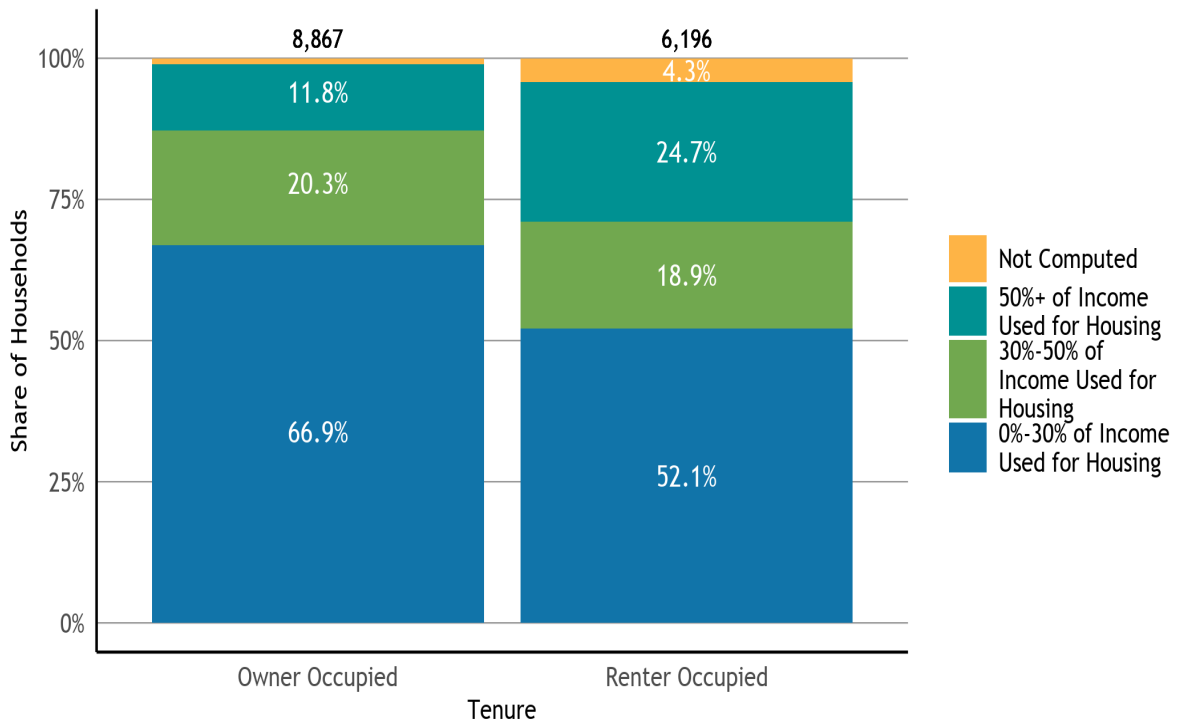


Figure 2-25 Cost Burden by Tenure

Universe: Occupied housing units.

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25070, B25091.

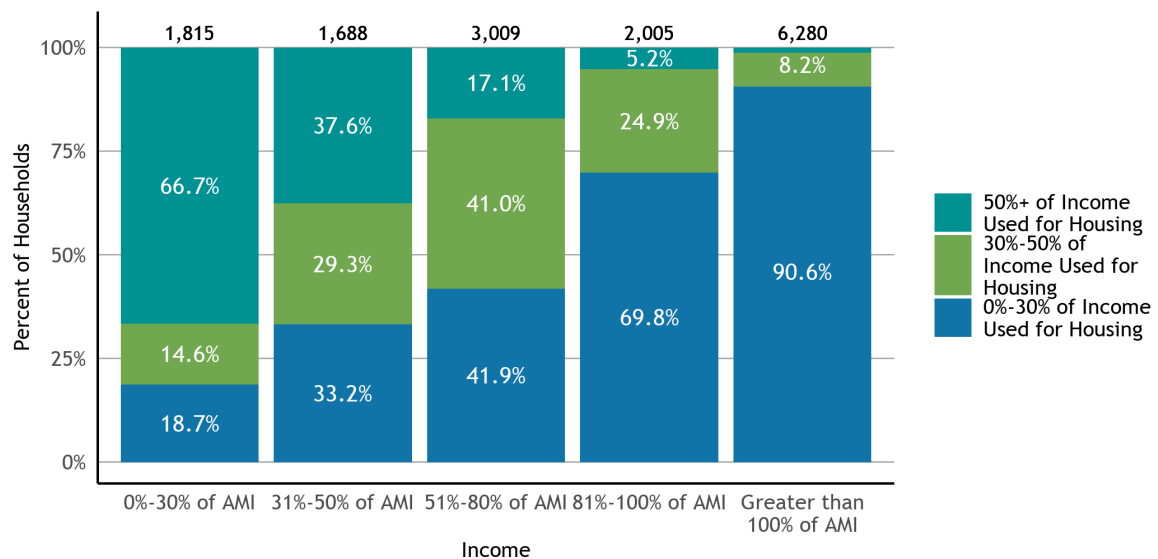


Figure 2-26 Cost Burden by Income Level

Universe: Occupied housing units.

Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release.

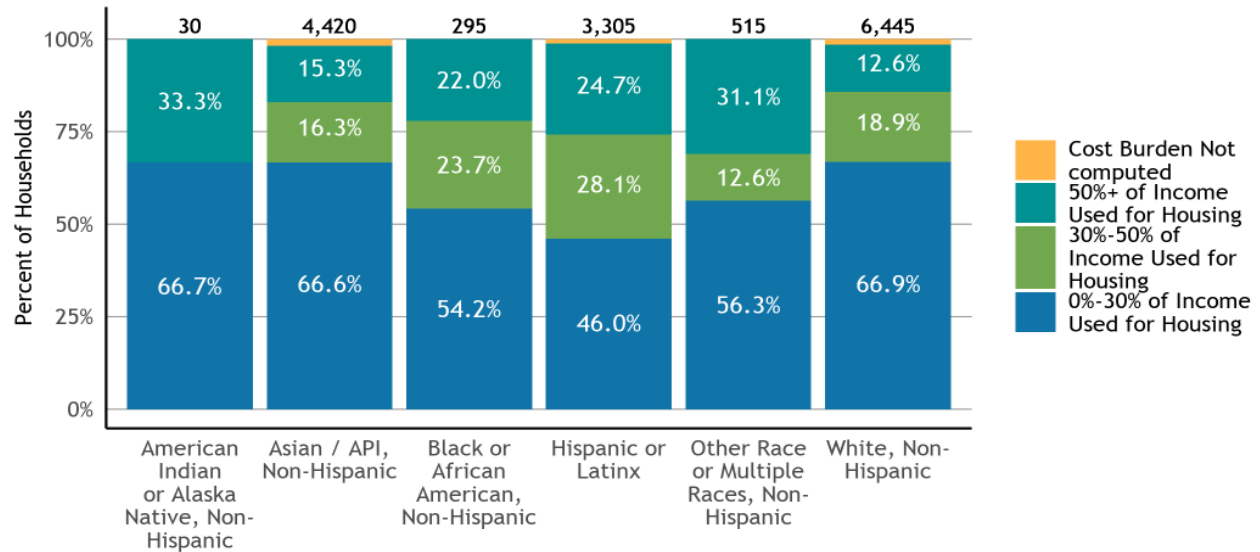


Figure 2-27 Cost Burden by Race

Universe: Occupied housing units.

Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release.

When cost-burdened seniors are no longer able to make house payments or pay rents, displacement from their homes can occur, putting further stress on the local rental market or forcing residents out of the community they call home. Understanding how seniors might be cost-burdened is of particular importance due to their special housing needs, particularly for low-income seniors. For example, 48% of seniors making less than 30% of AMI are spending the majority of their income on housing. For seniors making more than 100% of AMI, 98% are not cost-burdened and spend less than 30% of their income on housing (Figure 2-28).

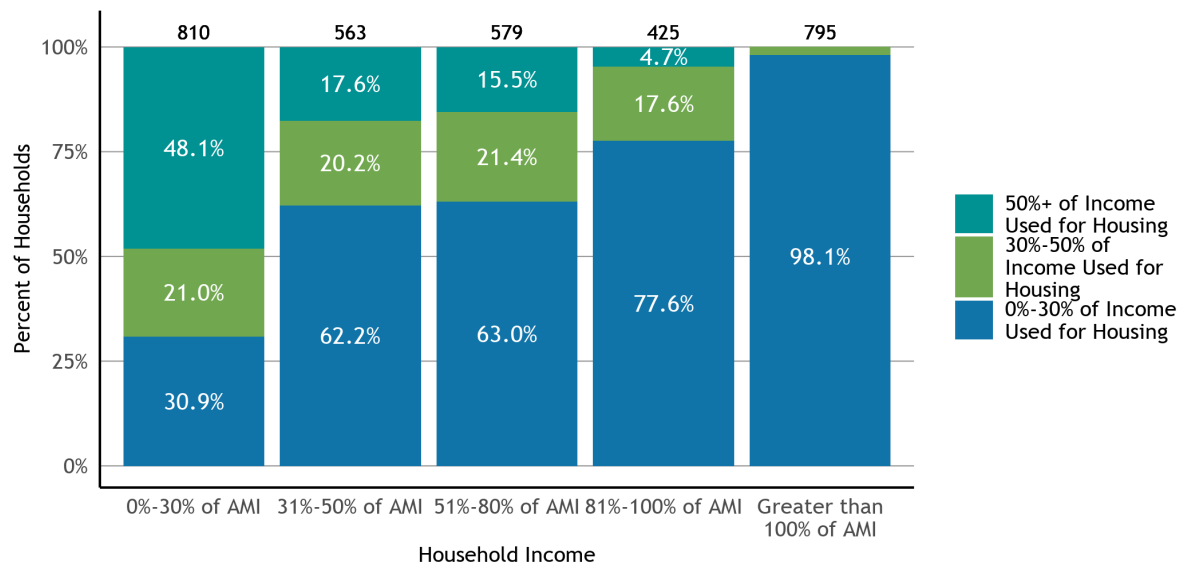


Figure 2-28 Cost-Burdened Senior Households by Income Level

Universe: Senior households.

Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release.

Large family households often have special housing needs due to a lack of adequately sized affordable housing available. The higher costs required for homes with multiple bedrooms can result in larger families experiencing a disproportionate cost burden than the rest of the population and can increase the risk of housing insecurity. In San Bruno, 33% of large family households experience a cost burden of 30%-50%, while 10% of households spend more than half of their income on housing (Figure 2-29). Large households often have different housing needs than smaller households. If a city's rental housing stock does not include larger apartments, large households who rent could end up living in overcrowded conditions.

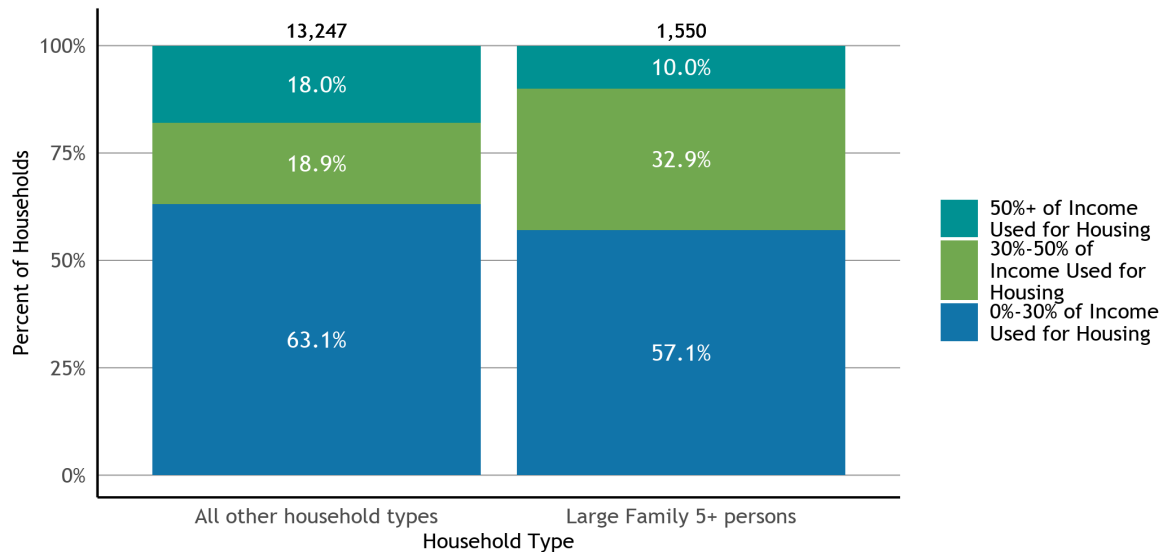


Figure 2-29 Cost Burden by Household Size

Universe: Occupied housing units.

Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release.

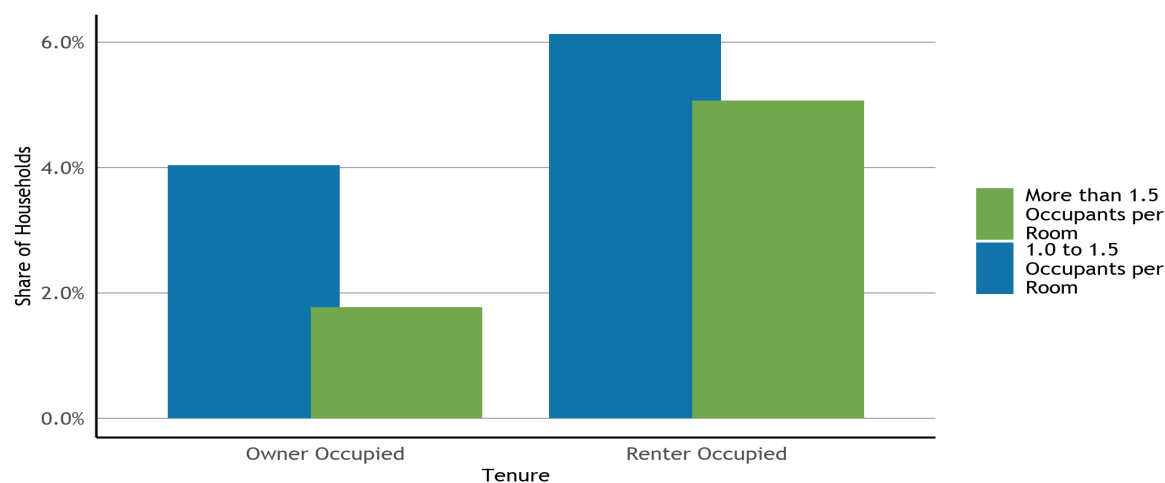
O. HOUSING OVERCROWDING

Overcrowding occurs when the number of people living in a household is greater than the home was designed to hold. There are several different standards for defining overcrowding, but this report uses the Census Bureau definition, which is more than one occupant per room (not including bathrooms or kitchens). Additionally, the Census considers units with more than 1.5 occupants per room to be severely overcrowded. The total number of occupied housing units that are considered overcrowded or severely overcrowded in the City of San Bruno is 1,209 (738 overcrowded and 471 severely overcrowded); these units make up 8% of overall total occupied housing units in the city. Overcrowding increases health and safety concerns and stresses the condition of the housing stock and infrastructure. Overcrowding correlates strongly with household size, particularly for large households. Table 2-15 shows that most households throughout the region are 2-person to 4-person households and 10% to 11% of households are 5-person or more households.

TABLE 2-15 HOUSEHOLDS BY HOUSEHOLD SIZE

	1-Person Household	2-Person Household	3-4-Person Household	5-Person or More Household	Total Households
San Bruno	25%	31%	34%	10%	15,063
San Mateo County	22%	32%	35%	11%	263,543
Bay Area	25%	32%	33%	11%	2,731,434

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25002.

**Figure 2-30 San Bruno Overcrowding by Tenure and Severity**

Universe: Occupied housing units.

Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release.

Overcrowding is often related to the cost of housing and can occur when demand in a city or region is high. In many cities, overcrowding is seen more amongst those that are renting, with multiple households sharing a unit to make it possible to stay in their communities. In San Bruno, 5% of households that rent are severely overcrowded (763 occupied housing units out of approximately 15,000 total occupied housing units have more than 1.5 occupants per room), compared to 2% of households that own (Figure 2-30). Six percent of renters (924 occupied housing units out of approximately 15,000 total occupied housing units have between 1 to 1.5 occupants per room) experience moderate overcrowding, compared to 4% for those own. Overcrowding often disproportionately impacts low-income households. Five percent or 744 households very low-income households (below 50% AMI) experience severe overcrowding, while 1% or 156 households above 100% AMI experience this level of overcrowding (Figure 2-31).

Communities of color are more likely to experience overcrowding similar to how they are more likely to experience poverty, financial instability, and housing insecurity. People of color tend to experience overcrowding at higher rates than White residents. In San Bruno, *Hispanic or Latino* households experience the highest rate of overcrowding (Figure 2-32).



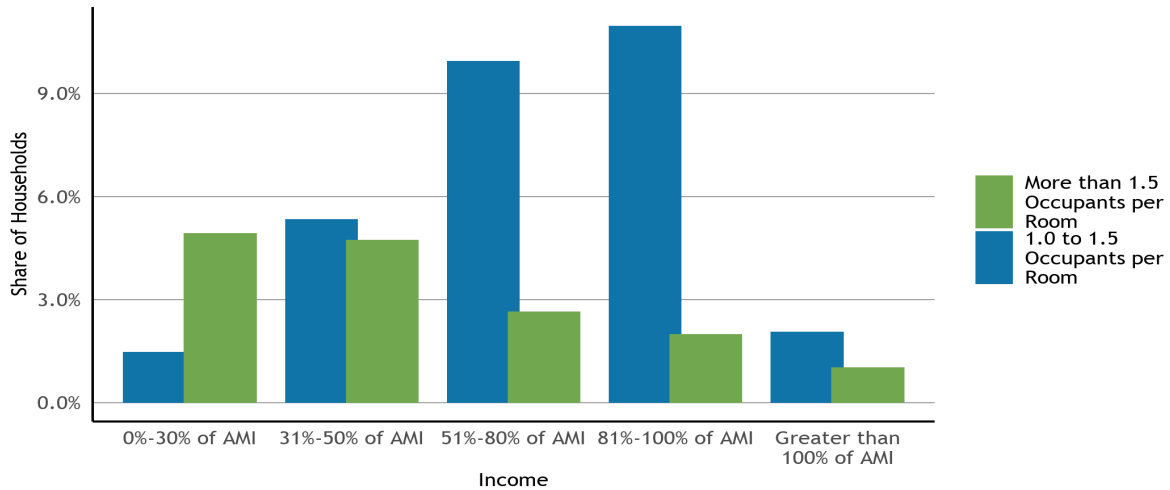


Figure 2-31 Overcrowding by Income Level and Severity

Universe: Occupied housing units.

Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release.

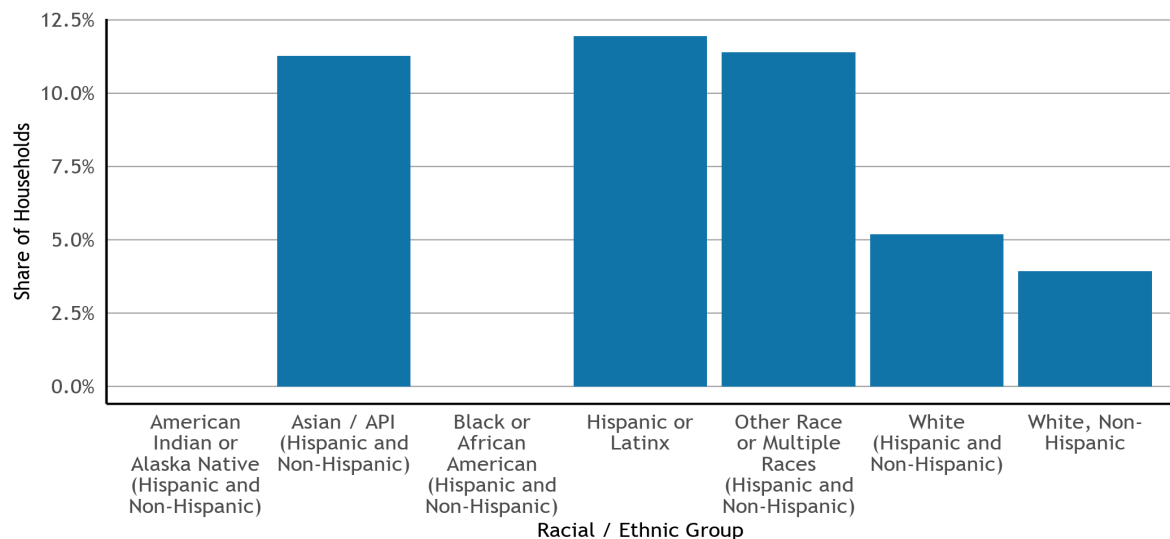


Figure 2-32 Overcrowding by Race

Universe: Occupied housing units.

Note: The Census Bureau defines an overcrowded unit as one occupied by 1.01 persons or more per room. Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B2501.

Several programs in this Housing Element will specifically help address cost burdened households which make up 44% of renters and 31% of homeowners in San Bruno. This Housing Element includes Program 2-D to implement SB 9 which will allow duplexes and lot splits on applicable single-family sites. This will increase the production of lower-cost housing options across the city and also in high resource neighborhoods. Increasing the number of units affordable to moderate- and lower-income households will help lower the rates of cost burden in San Bruno. Other programs aim to help address overcrowding, for example, by helping to provide more options for affordable intergenerational housing for single family homeowners. Program 4-P will promote the Accessory Dwelling Unit Ordinance, making it easier to build ADUs including pre-approved ADU plans and encouraging ADUs in new single-family development with a goal of issuing building permits for 44 accessory dwelling units per year.

P. OTHER HOUSING ISSUES

1. AGING HOUSING STOCK

Production has not kept up with housing demand for several decades in the Bay Area, as the total number of units built and available has not yet come close to meeting the population and job growth experienced throughout the region. In San Bruno, the largest proportion of the housing stock was built 1940 to 1959, with 6,203 units constructed during this period (Figure 2-33). Since 2010, 2.4% of the current housing stock was built, which is only 379 units. Additionally, older housing can be more expensive to maintain and renovate.

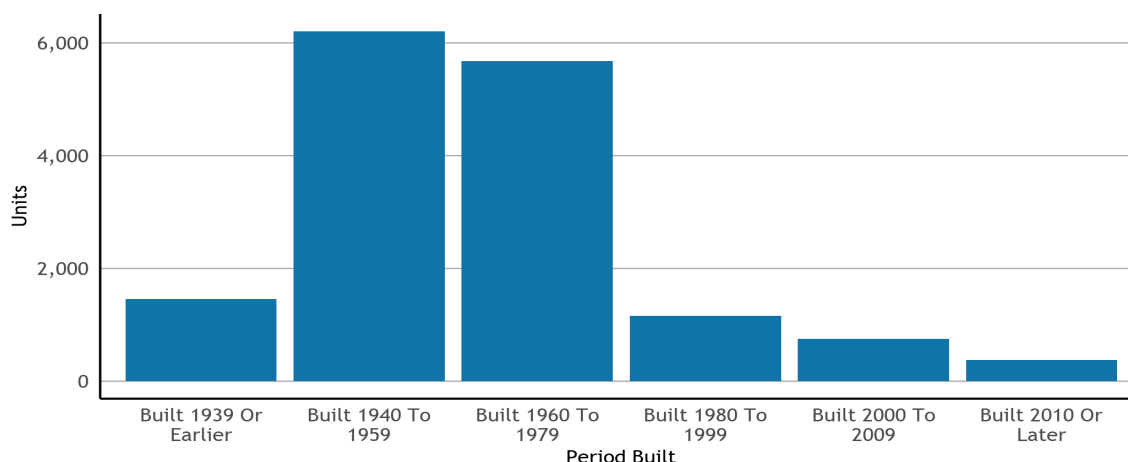


Figure 2-33 Housing Units by Year Structure Built

Universe: Housing units.

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25034.

Between 2015 and 2019, 168 housing units were issued permits in San Bruno. Thirty-three percent of permits issued in San Bruno were for above moderate-income housing, 28% were for moderate-income housing, and 39% were for low- or very low-income housing (Table 2-16).

TABLE 2-16 HOUSING PERMITTING

Low-Income Permits	66
Above Moderate-Income Permits	55
Moderate-Income Permits	47
Very Low-Income Permits	0

Universe: Housing permits issued between 2015 and 2019.

Source: California Department of Housing and Community Development (HCD), 5th Cycle Annual Progress Report Permit Summary (2020).

2. SUBSTANDARD HOUSING

Housing costs in the region are among the highest in the country, which could result in households, particularly renters, needing to live in substandard conditions in order to afford housing. Generally, there is limited data on the extent of substandard housing issues in the community. However, the Census Bureau data included in the graph below gives a sense of some of the substandard conditions that may be present in San Bruno. For example, 0.4% (58 occupied housing units) of renters in San Bruno reported lacking a kitchen and



0.1% (19 occupied housing units) of renters lack plumbing, compared to 0.0% of owners who lack a kitchen and 0.1% (15 occupied housing units) of owners who lack plumbing (Figure 2-34).²⁷ The American Community Survey tracks other housing problems, including a lack of plumbing and kitchen facilities. Homes in San Bruno have a very small number of other housing problems. Approximately 92 homes are lacking either complete plumbing facilities or complete kitchen facilities. Approximately 6,203 housing units or 40% of San Bruno's housing units are older than 60 years (built in 1959 or earlier). Thirty six percent of housing units (5,678 units) were built between 1960-1979. Seventy-six percent of housing units in San Bruno are more than 40 years old. At this age, many units are in need of at least minor repairs.. The city's code enforcement department estimates that the number of units in need of rehabilitation in the city is 5% of the city's housing stock. Furthermore, most of the city's substandard housing is concentrated in the neighborhoods east of El Camino Real where there the housing stock is generally older and the neighborhoods have a higher percentage of renters and housing overcrowding.

This Housing Element includes programs and actions, such as Program 3-E, to help renovate and retrofit existing housing stock, especially for naturally occurring affordable units.

3. SPECIAL HOUSING NEEDS

Certain groups have greater difficulty in finding decent, affordable housing due to their special circumstances. Special circumstances may be related to employment and income, family characteristics, disability, and household characteristics.

In addition to overall housing needs, cities and counties must plan for the special housing needs of certain groups. State law (65583(b)(7)) requires that several populations with special needs be addressed — homeless people, seniors, people living with a disability, large families, female headed households and farmworkers. This section provides a discussion of the housing needs facing each group.

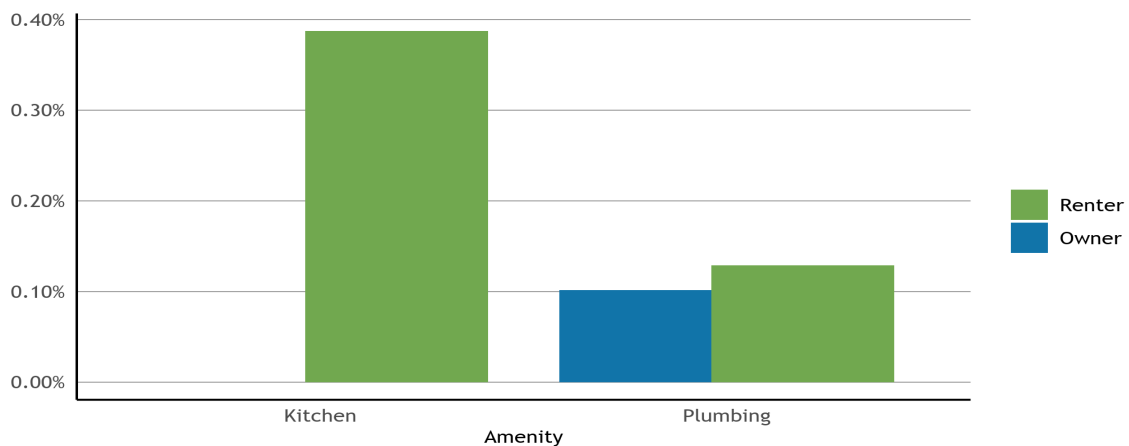


Figure 2-34 Substandard Housing Issues

Universe: Occupied housing units.

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25053, Table B25043, Table B25049.

²⁷ The US Census Bureau uses the definition of a complete kitchen as including a sink with piped water, range or cook stove and a refrigerator.

KEY POINTS: COMMON HOUSING PROBLEMS**COST-BURDEN**

- In San Bruno, 37 percent of households are cost burdened or severely cost burdened.
- The following are the most cost-burdened residents in San Bruno:
 - 67 percent households making less than 30 percent of AMI.
 - Hispanic or Latinx residents.
 - American Indian or Alaska Native.
 - 48 percent of seniors making less than 30 percent of AMI.
 - 43 percent of large family households.
- Spending such large portions of income on housing puts households at higher risk of displacement, eviction, or homelessness.
- Cost-burdened households live in overcrowded homes and have limited money to dedicate towards other necessities such as food, transportation, and medical care.
- Understanding how seniors might be cost-burdened is of particular importance due to their special housing needs, particularly for low-income seniors.

OVERCROWDING

- Overcrowding increases health and safety concerns and stresses the condition of the housing stock and infrastructure.
- Overcrowding is often related to the cost of housing and can occur when demand in a city or region is high. In many cities, overcrowding is seen more amongst those that are renting, with multiple households sharing a unit to make it possible to stay in their communities.

SUBSTANDARD HOUSING

- The City estimates that 10% of its housing units are substandard with higher concentrations of substandard housing in the neighborhoods east of El Camino Real.
- Housing costs in the region are among the highest in the country, which could result in households, particularly renters, needing to live in substandard conditions in order to afford housing.

Q. SENIORS

According to American Community Survey 2021 estimates, there are currently approximately 6,674 seniors living in San Bruno. As the large baby boomer generation ages, San Bruno, like the rest of San Mateo County, is expected to see a growing senior population. According to California Department of Finance, by 2030 there will be 242,838 seniors over the age of 60 in San Mateo County.²⁸ This would be a 26% increase in the number of seniors between 2020 and 2030. For seniors over the age of 80, the projection is a 56% increase from 2020 to 2030 (Table 2-17).

²⁸ California Department of Finance Population Estimates and Projections by Age, 2012 – 2020; With Projections for 2021, 2025, and 2030: Projections | Department of Finance (ca.gov).

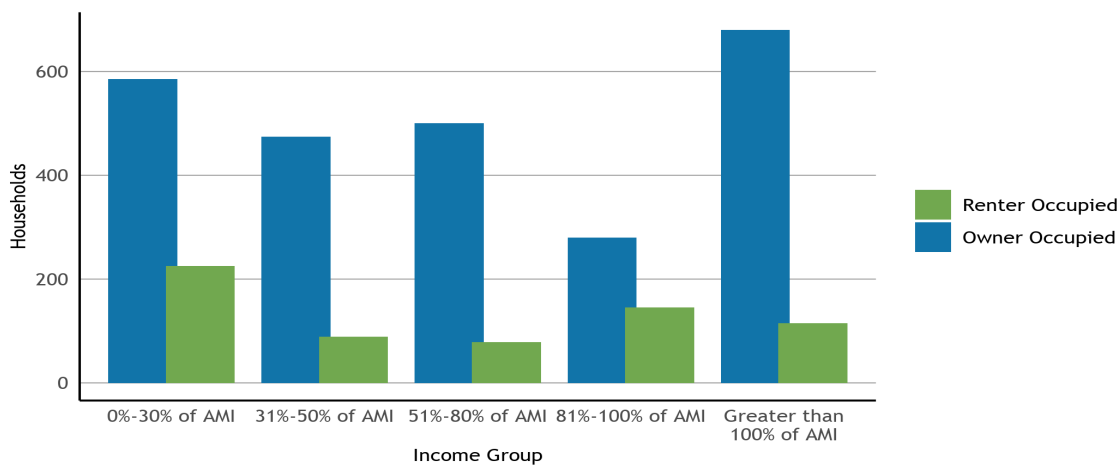


TABLE 2-17 SAN MATEO COUNTY SENIORS IN 2020 AND 2030

	2020 Estimate	2030 Projection	Percent Increase
Age 60-69	95,247	103,152	8.3%
Age 70-79	61,304	83,215	36%
Age 80+	36,162	56,471	56%
Totals	192,713	242,838	26%

Source: California Department of Finance Population Estimates and Projections by Age, 2012 – 2020; With Projections for 2021, 2025, and 2030.

Seniors who rent may be at even greater risk for housing challenges than those who own, due to income differences between these groups. The largest proportion of senior households who rent make 0%-30% of AMI, while the largest proportion of senior households who are homeowners falls in the income group Greater than 100% of AMI (Figure 2-35). Often, homeownership means greater housing security. Senior renters are particularly at risk for displacement because their incomes are decreasing while their housing expenses are increasing. Tables 2-16 and 2-17 show a comparison of income and home ownership for seniors living in San Bruno. This Housing Element proposes programs that will directly target the housing challenges of San Bruno's seniors. For example, Program 4-M supports home sharing programs through the Senior Center and other local agencies and Program 2-G provides expedited review applications for housing for seniors.

**Figure 2-35 San Bruno Senior Households by Income and Tenure**

Universe: Senior households.

Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release.

Seniors' income tends to decline as they age. Young seniors often have some retirement savings or employment income that can supplement social security. Older seniors are more likely to use up their savings and therefore are more likely to live in poverty. Twenty-six percent of senior households in San Bruno earn 0%-30% of AMI, and 44% of senior households earn below 50% AMI (Table 2-18).

TABLE 2-18 SENIOR HOUSEHOLDS BY INCOME AND TENURE

Income Group	Owner Occupied	Renter Occupied	Total by AMI Group
0%-30% of AMI	585 (23%)	225 (34%)	810 (26%)
31%-50% of AMI	474 (19%)	89 (14%)	563 (18%)
51%-80% of AMI	500 (20%)	79 (12%)	579 (18%)
81%-100% of AMI	280 (11%)	145 (22%)	425 (13%)
Greater than 100% of AMI	680 (27%)	115 (18%)	795 (25%)
Totals	2,519 (100%)	653 (100%)	3,172 (100%)

Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release.

Senior households often experience a combination of factors that can make accessing or keeping affordable housing a challenge. They often live on fixed incomes and are more likely to have disabilities, chronic health conditions and/or reduced mobility. Table 2-19 shows that 48% and 21% (69% total) of extremely low-income (less than 30% AMI) seniors are severely cost burdened or cost burdened. A key challenge in the coming years will be how to accommodate the needs of aging residents.

TABLE 2-19 SAN BRUNO COST BURDEN OF SENIOR HOUSEHOLDS BY INCOME

Income Group	0%-30% of Income Used for Housing (Not Cost Burdened)	30%-50% of Income Used for Housing (Cost Burdened)	50%+ of Income Used for Housing (Severely Cost Burdened)	Total by AMI
0%-30% of AMI	250 (31%)	170 (21%)	390 (48%)	810
31%-50% of AMI	350 (62%)	114 (20%)	99 (18%)	563
51%-80% of AMI	365 (63%)	124 (21%)	90 (16%)	579
81%-100% of AMI	330 (78%)	75 (18%)	20 (5%)	425
Greater than 100% of AMI	780 (98%)	15 (2%)	0 (0%)	795
Total by Level of Cost Burden	2,075	498	599	3172

Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release.

Housing concerns for seniors in San Bruno might include retrofits to allow seniors to age in place (stay in their current home as they get older) or stay in the community but in a smaller unit or with services available. Younger seniors need less support and may benefit from programs to help them rehabilitate their homes to make them better for people to age in place. Older seniors often are unable to maintain a single-family home and look to move to a smaller home or some type of senior living development.

R. PEOPLE WITH DISABILITIES

People with disabilities face additional housing challenges. Encompassing a broad group of individuals living with a variety of physical, cognitive and sensory impairments, many people with disabilities live on fixed incomes and are in need of specialized care, yet often rely on family members for assistance due to the high cost of care. In addition to their specific housing needs people with disabilities are at a high risk for housing insecurity, homelessness, and institutionalization, particularly when they lose aging caregivers. Figure 2-36



shows the rates at which different disabilities are present among residents of San Bruno. Overall, 8% of people in San Bruno have a disability of any kind.²⁹

Special needs of individuals with disabilities vary depending on the particular disability. For example, the needs of a blind person differ greatly from those of a person confined to a wheelchair. Special facilities, such as ramps, elevators, or specially designed restrooms necessary for wheelchair access are architectural features needed to make dwellings suitable for persons confined to wheelchairs. Special features needed by ambulatory persons constrained by other disabilities may not be architectural; rather, these might be simple alternatives to conventional dwelling units or furnishings and appliances that make ordinary tasks of housekeeping and home life less trying and more enjoyable. In families, the needs of persons with disabilities, in terms of special features, are fewer than those of a single person. Nevertheless, a person with a disability in a family would still have special needs. Special architectural features or contrivances could be valuable in giving this person greater independence, dignity, and quality of living.

Many developmentally disabled persons can live and work independently within a conventional housing environment. More severely disabled individuals require a group living environment where supervision is provided. The most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. Because developmental disabilities exist before adulthood, the first issue in supportive housing for the developmentally disabled is transition from the person's living situation as a child to an appropriate level of independence as an adult.

More severely disabled individuals require a group living environment where supervision is provided. The most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. Because developmental disabilities exist before adulthood, the first issue in supportive housing for the developmentally disabled is transition from the person's living situation as a child to an appropriate level of independence as an adult.

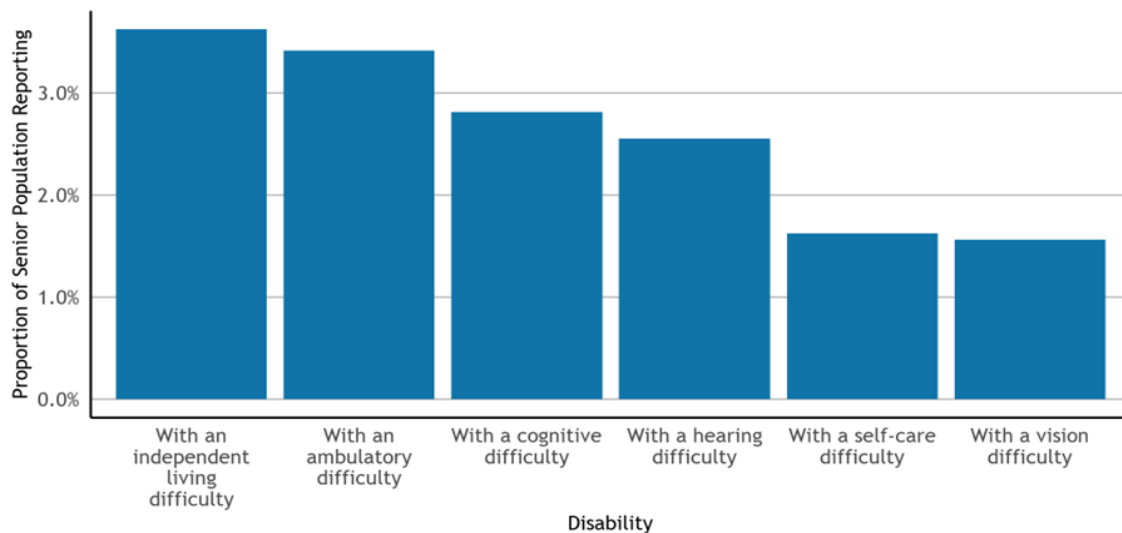


Figure 2-36 Disability by Type

Universe: Civilian noninstitutionalized population 18 years and over.

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B18102, Table B18103, Table B18104, Table B18105, Table B18106, Table B18107.

²⁹ These disabilities are counted separately and are not mutually exclusive, as an individual may report more than one disability. These counts should not be summed.

The California Department of Developmental Services (DDS) currently provides community-based services to approximately 350,000 persons with developmental disabilities and their families through a statewide system of 21 regional centers. The Golden Gate Regional Center is 1 of 21 regional centers in California that provide point of entry to services for people with developmental disabilities. The center is a private, nonprofit community agency that contracts with businesses to offer services to individuals with developmental disabilities and their families.

TABLE 2-20 POPULATION WITH DEVELOPMENTAL DISABILITIES BY RESIDENCE

Residence Type	Value
Home of Parent / Family / Guardian	216
Community Care Facility	68
Intermediate Care Facility	22
Other	5
Foster /Family Home	5
Independent /Supported Living	5

Universe: Population with developmental disabilities.

Source: California Department of Developmental Services, Consumer Count by California ZIP Code and Residence Type (2020).

In San Bruno, of the population with a developmental disability, children under the age of 18 make up 36.5%, while adults account for 63.5%. The most common living arrangement for individuals with disabilities in San Bruno is the home of parent /family /guardian. When it comes to housing, people with disabilities are not only in need of affordable housing but accessibly designed housing, which offers greater mobility and opportunity for independence. There is a limited supply of handicap accessible, affordable housing generally, and the supply is especially tight near transit. Some people with developmental disabilities are unable to work, rely on Supplemental Security Income, and live with family members. People with disabilities are also often extremely low-income due to the challenge of securing long-term employment, and due to higher medical bills.³⁰

The availability of accessible housing is critical to enable persons with disabilities to live independent lives with minimal support. It is also essential to enable persons with disabilities to participate in society by visiting the homes of friends and family. Housing that meets the needs of persons with disabilities is increasingly important as the population ages.

According to the 2019 American Housing Survey administered by HUD, households of lower socioeconomic status (as measured by income and education) and households that include veterans or someone 65 years of age or older were more likely to include someone with accessibility needs.³¹

The California Building Code (CBC) requires that publicly funded housing meet certain accessibility Standards, but there hasn't been a public funded housing project constructed in San Bruno. Most of the housing anticipated to be built will be privately funded. To meet the housing needs of persons with physical and mental disabilities, the City added Program 3-E to develop requirements that increase the number of housing units with accessibility features.

³⁰ For more information or data on developmental disabilities in your jurisdiction, contact the Golden Gate Regional Center for Marin, San Francisco and San Mateo Counties; the North Bay Regional Center for Napa, Solano and Sonoma Counties; the Regional Center for the East Bay for Alameda and Contra Costa Counties; or the San Andreas Regional Center for Santa Clara County.

³¹ Accessibility in Housing: Findings from the 2019 American Housing Survey (huduser.gov)



In addition to the removal of architectural barriers and provision of special accessibility features, persons with physical and developmental disabilities may also need supportive services to help them maintain an independent lifestyle. Individuals with moderate to severe physical or developmental disabilities may need access to assisted living facilities. These facilities are principally permitted in all zoning districts where housing is permitted.

1. FAIR HOUSING LAWS AND STATE LEGISLATION

Fair housing laws and subsequent federal and state legislation require all cities and counties to further housing opportunities by identifying and removing constraints to the development of housing for individuals with disabilities, including local land use and zoning barriers, and to also provide reasonable accommodation as one method of advancing equal access to housing.

The Fair Housing laws require that cities and counties provide flexibility or even waive certain requirements when it is necessary to eliminate barriers to housing opportunities for people with disabilities. An example of such a request might be to place a ramp in a front yard to provide access from the street to the front door. San Bruno received one reasonable accommodation request since January 2015.

Chapter 7 (Goals, Programs and Implementation Actions) includes several programs and actions that strengthens the city's ability to promote fair housing and addresses the housing challenges of residents with disabilities by making it easier to develop housing for people with physical and developmental disabilities., including Programs 2-G, 2-H, 3-A, 3-E, 4-A, 4-B, 4-C, 4-D, 4-E, 4-G, 4-H 5-E, and 8-B, among others specifically address these challenges. Programs 2-E and 4-O, for example, both provide for an affordable unit set aside for tenants with physical and developmental disabilities. Programs 4-A, 4-B, 4-C, and 4-E support education and training for landlords and tenants about fair housing laws and the rights of people with disabilities.

S. FEMALE-HEADED HOUSEHOLDS

Households headed by one person are often at greater risk of housing insecurity, particularly female-headed households, who may be supporting children or a family with only one income. In San Bruno, the largest proportion of households is *Married-couple Family Households* at 53% of total, while *Female-Headed Family Households* (who live with and support other family members) make up 10% of all households.

Female-headed households with children may face particular housing challenges, with pervasive gender inequality resulting in lower wages for women. Moreover, the added need for childcare can make finding a home that is affordable more challenging. In San Bruno, 16% of female-headed households with children fall below the Federal Poverty Line, while 4% of female-headed households *without* children live in poverty (Figure 2-38). The special needs of female-headed households can include low-cost housing, suitable for children and located near schools and childcare facilities. The most vulnerable households can be single parent female-headed households; San Bruno has 770 such households.

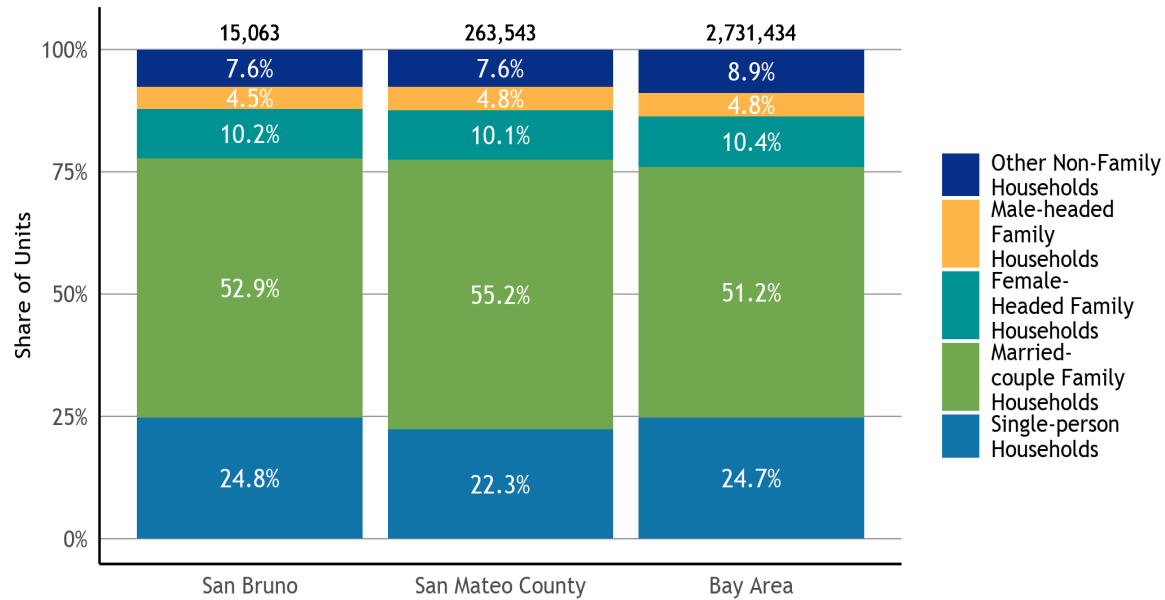


Figure 2-37 Household Type

Universe: Households.

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B11001.

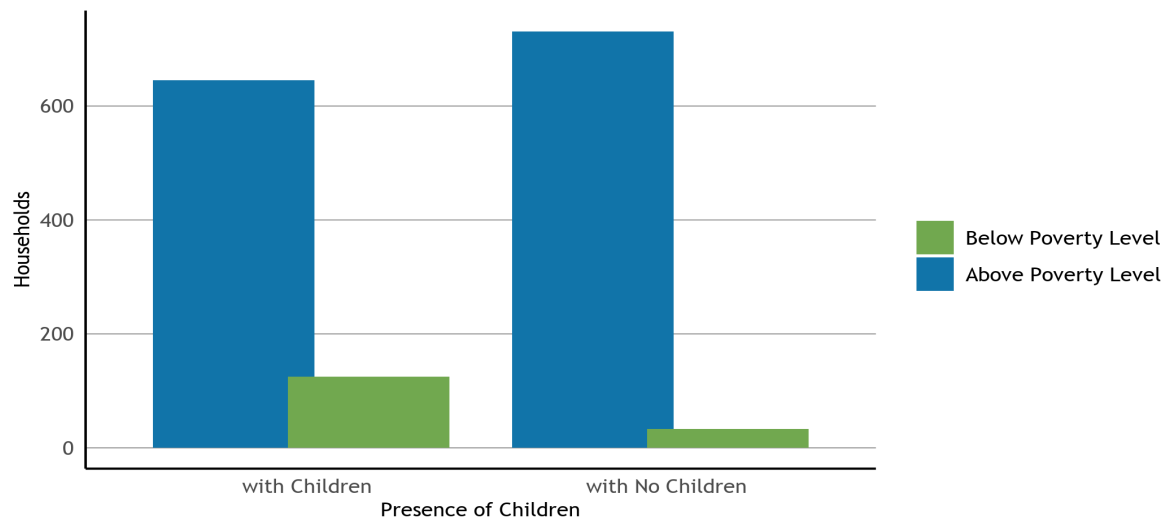


Figure 2-38 Female-Headed Households by Poverty Status

Universe: Female Households.

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B17012.

T. LARGE HOUSEHOLDS

Large households are defined as households with five or more members living in the same home. Large households are a special needs group because of the difficulty in finding adequate and affordable housing. Many jurisdictions have few large homes, and often these larger homes are significantly more expensive. Large households throughout San Mateo County are much more likely than smaller households to live in a

home with some type of housing problem, such as high cost, or problems with the physical condition of the home. San Bruno has approximately 1,500 households with five or more members.

Large households often have different housing needs than smaller households. If a city's rental housing stock does not include larger apartments, large households who rent could end up living in overcrowded conditions. In San Bruno, for large households with 5 or more persons, most units (69%) are owner occupied (Figure 2-39). In 2017, 20% of large households were very low-income, earning less than 50% of the AML.

Programs 2-G and 2-H in this Housing Element includes encouraging the housing construction to enhance access to large families by reducing development constraints to encourage diversity in unit size. Program-2-G seeks to increase housing by pursuing additional ways to streamline development of or granting fee waivers for affordable housing projects. Program 2-H seeks to lower parking requirements for 2-bedroom or larger units. These programs aim to increase the percentage of housing to accommodate residents with disproportionate housing needs, including large families.

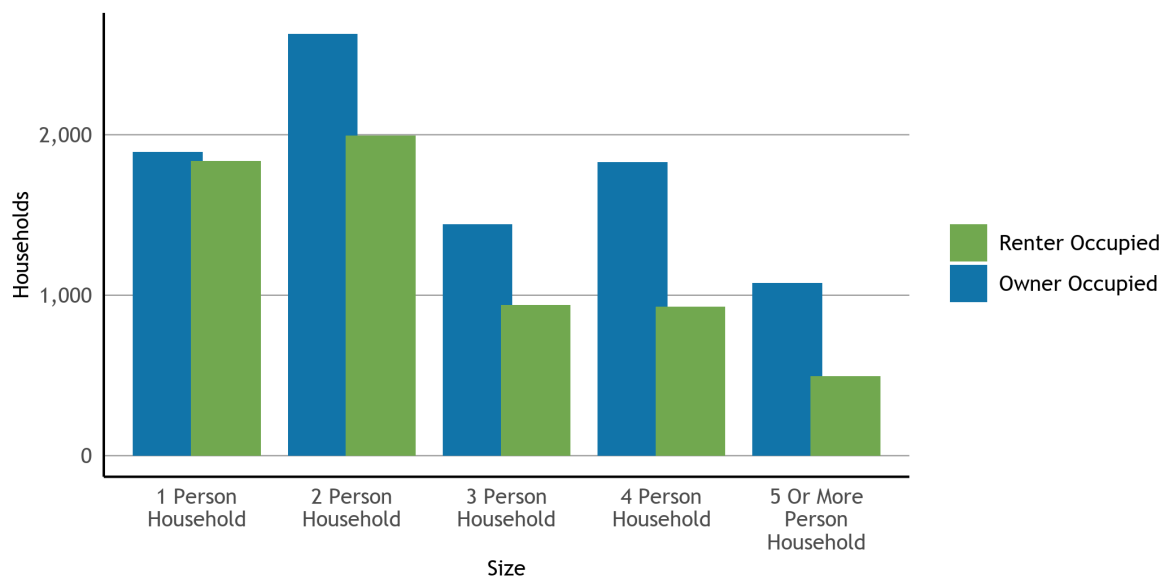


Figure 2-39 Household Size by Tenure

Universe: Occupied housing units.

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25009.

The unit sizes available in a community affect the household sizes that can access that community. Large families are generally served by housing units with three or more bedrooms, of which there are 7,608 units in San Bruno. Among these large units with three or more bedrooms, 15% are owner-occupied and 85% are renter occupied (Figure 2-40).

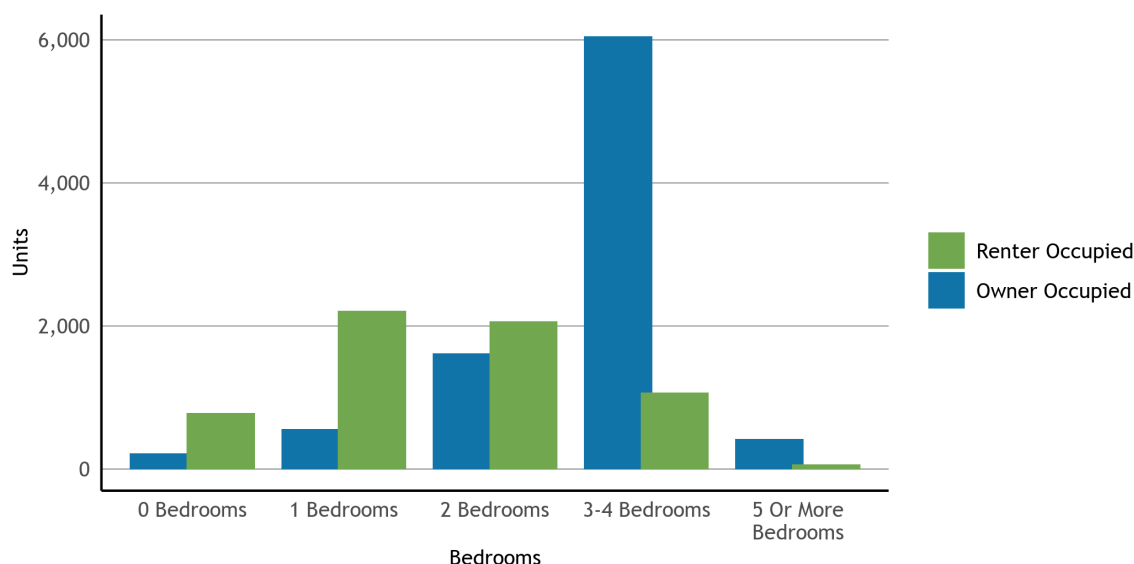


Figure 2-40 Housing Units by Number of Bedrooms

Universe: Housing units.

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25042.

U. EXTREMELY LOW-INCOME HOUSEHOLDS

California is one of the most economically unequal states in the nation, and the Bay Area has the highest income inequality between high- and low-income households in the state³². In San Bruno, 42% of households make more than 100% of the AMI, compared to 13.5% making less than 30% of AMI, which is considered extremely low-income.³³ Regionally, more than half of all households make more than 100% AMI, while 15% make less than 30% AMI. Many households with multiple wage earners—including food service workers, full-time students, teachers, farmworkers and healthcare professionals—can fall into lower AMI categories due to relatively stagnant wages in many industries.

Extremely Low-Income (ELI) households earn 30% of the AMI or less. There are 2,023 ELI households in San Bruno according to 2017 CHAS data (~5% of the population for whom poverty status is determined in San Bruno). More than half of these households live in rental units. Most of San Bruno's ELI households face some kind of housing problem: Approximately 48% of all ELI households face overcrowding, and 80% face overpayment. Some ELI households are recipients of public assistance such as social security insurance or disability insurance. Housing types available and suitable for ELI households include affordable rentals, secondary dwelling units, emergency shelters, supportive housing and transitional housing.

The effects of COVID-19 have disparately harmed low-income households. In San Bruno, the effects were felt across all communities but exceedingly affected Native American, Multi-racial, and African American

³² Bohn, S. et al. 2020. Income Inequality and Economic Opportunity in California. *Public Policy Institute of California*.

³³ Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas, and the nine county Bay Area includes the following metropolitan areas: Napa Metro Area (Napa County), Oakland-Fremont Metro Area (Alameda and Contra Costa Counties), San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties), San Jose-Sunnyvale-Santa Clara Metro Area (Santa Clara County), Santa Rosa Metro Area (Sonoma County), and Vallejo-Fairfield Metro Area (Solano County). The AMI levels in this chart are based on the HUD metro area where this jurisdiction is located. Households making between 80% and 120% of the AMI are moderate-income, those making 50% to 80% are low-income, those making 30% to 50% are very low-income, and those making less than 30 percent are extremely low-income. This is then adjusted for household size.

households. These communities experience, on average, double the overall poverty rate. Across the country, systemic inequalities in employment, wage-earning, health, and well-being have strained individuals, families and communities facing poverty or near-poverty conditions.

Goals 2, 3 and 4 include programs that supports the needs of households with low and extremely low incomes, such as continuing City support the Housing Investment Partnership (HIP) Home Sharing program which facilitates living arrangements among two or more unrelated people (Program 4-M) or continuing to participate in San Mateo County Housing Authority's Housing Choices Voucher program (formerly Section 8 under HUD) (Program 4-N). The five programs under Goal 3 "Improve the city's management of its affordable housing portfolio and its affordable housing funds" will collectively help the city better support and monitor housing programs that serve extremely low-income residents in the city.

V. HOMELESS NEEDS

Homelessness remains an urgent challenge in many communities across the state, reflecting a range of social, economic, and psychological factors. Rising housing costs result in increased risks of community members experiencing homelessness. Far too many residents who have found themselves housing insecure have ended up unhoused or homeless in recent years, either temporarily or longer term. Addressing the specific housing needs for the unhoused population remains a priority throughout the region, particularly since homelessness is disproportionately experienced by people of color, people with disabilities, those struggling with addiction and those dealing with traumatic life circumstances. The homeless in San Mateo County are both sheltered, meaning they live in emergency shelters, transitional housing, treatment centers or other similar institutions; and unsheltered, meaning they live on the street, in encampments or in a vehicle.

The vast majority of homeless people are single adults (who may be living with another adult, but no children). Most homeless people are male (a range between 60%-71% depending on sheltered and unsheltered). In San Mateo County, White (Hispanic and Non-Hispanic) residents represent the largest proportion of residents experiencing homelessness and account for 67% of the homeless population, while making up 51% of the overall population (Figure 2-41). Latino residents represent 38% of the population experiencing homelessness, while Latino residents comprise 25% of the general population (Figure 2-41). In 2017, 89% of households were either single individuals or couples without children and 13% were households with children.³⁴ Of homeless households with children, most are sheltered in transitional housing (Figure 2-43).

³⁴ San Mateo County Health Care for the Homeless and Farmworker Health Program 2019 Needs Assessment: 2019_hchfh_needs_assessment_report_final_9.1.2020.pdf (smchealth.org).

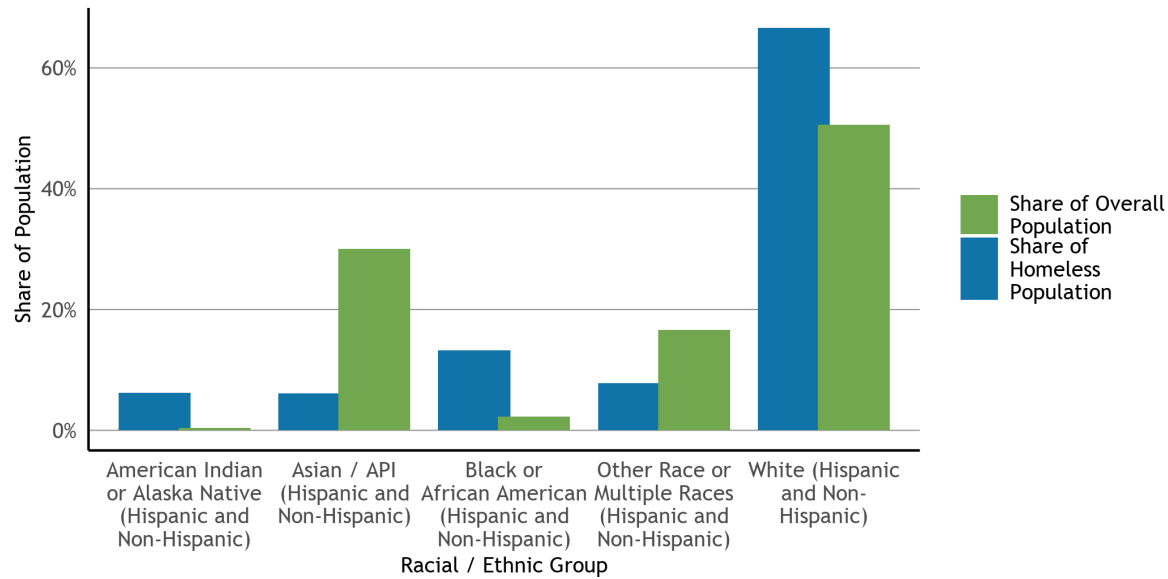


Figure 2-41 Racial Group Share of General and Homeless Populations, San Mateo County

Universe: Population experiencing homelessness.

Source: U.S. Department of Housing and Urban Development (HUD), Continuum of Care (CoC) Homeless Populations and Subpopulations Reports (2019); U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B01001(A-I).

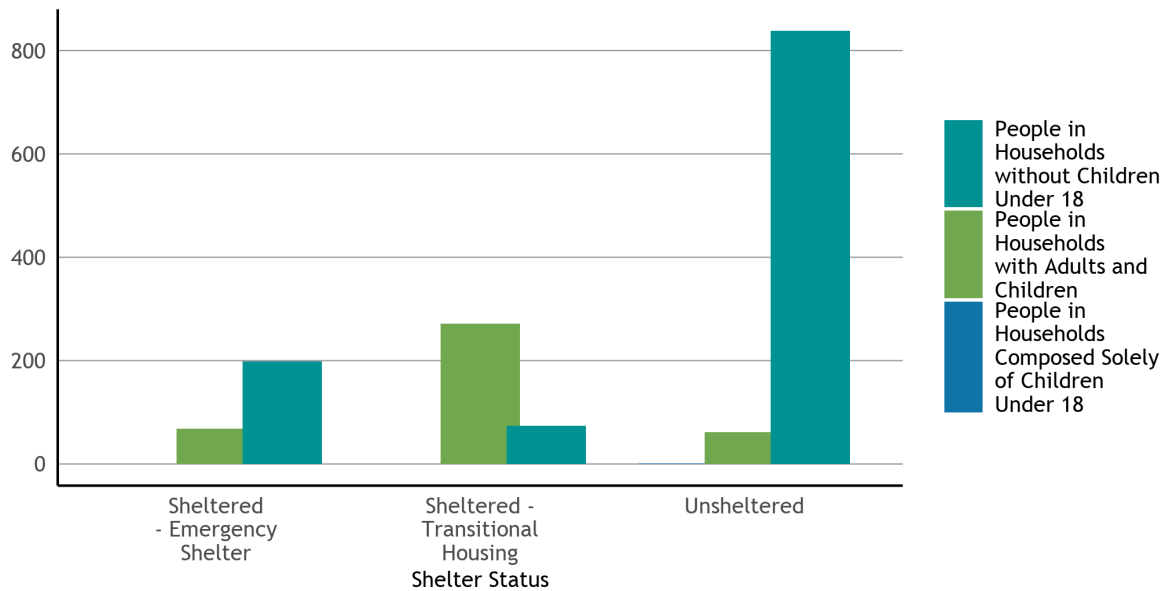


Figure 2-42 Homelessness by Household Type and Shelter Status, San Mateo County

Universe: Population experiencing homelessness.

Source: U.S. Department of Housing and Urban Development (HUD), Continuum of Care (CoC) Homeless Populations and Subpopulations Reports (2019).

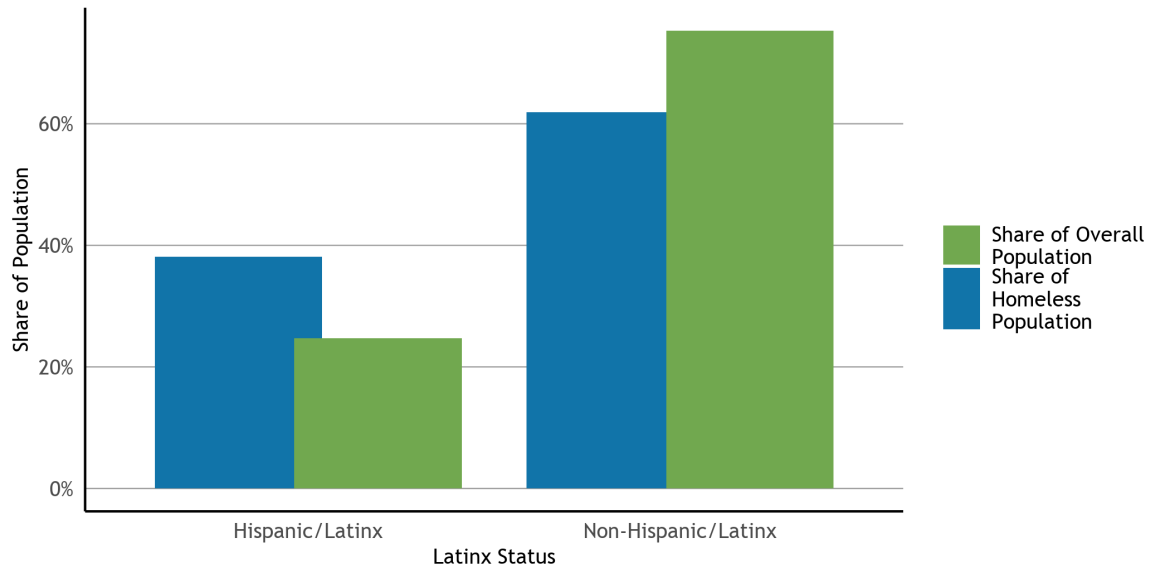


Figure 2-43 Latino Share of General and Homeless Populations, San Mateo County

Universe: Population experiencing homelessness.

Source: U.S. Department of Housing and Urban Development (HUD), Continuum of Care (CoC) Homeless Populations and Subpopulations Reports (2019); U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B01001(A-I).

Many of those experiencing homelessness are dealing with severe issues—including mental illness, substance abuse and domestic violence—that are potentially life threatening and require additional assistance. In San Mateo County, homeless individuals are commonly challenged by severe mental illness, with 305 reporting this condition (Figure 2-44). Of those, some 62% are unsheltered, further adding to the challenge of handling the issue.

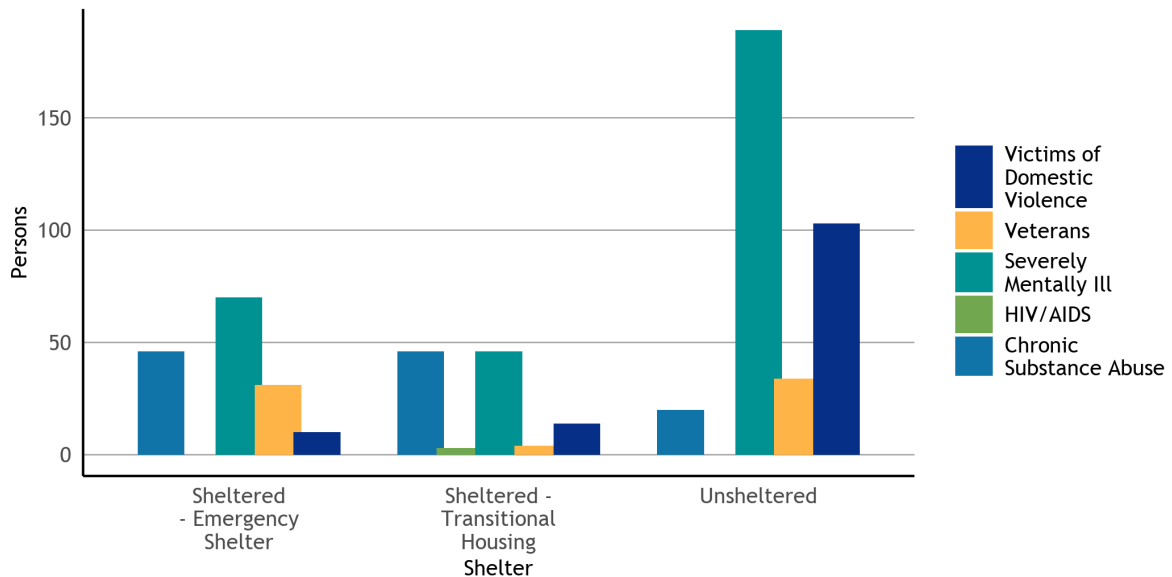


Figure 2-44 Characteristics for the Population Experiencing Homelessness, San Mateo County

Universe: Population experiencing homelessness.

Source: U.S. Department of Housing and Urban Development (HUD), Continuum of Care (CoC) Homeless Populations and Subpopulations Reports (2019).

In San Bruno, there were no reported students experiencing homelessness in the 2019-20 school year. By comparison, San Mateo County has seen a 37.5% decrease in the population of students experiencing homelessness since the 2016-17 school year, and the Bay Area population of students experiencing homelessness decreased by 8.5%. During the 2019-2020 school year, there were still some 13,718 students experiencing homelessness throughout the region, adding undue burdens on learning and thriving, with the potential for longer term negative effects.

TABLE 2-21 STUDENTS IN LOCAL PUBLIC SCHOOLS EXPERIENCING HOMELESSNESS

Academic Year	San Bruno	San Mateo County	Bay Area
2016-17	0	1,910	14,990
2017-18	0	1,337	15,142
2018-19	0	1,934	15,427
2019-20	0	1,194	13,718

Universe: Total number of unduplicated primary and short-term enrollments within the academic year (July 1 to June 30), public schools.

Source: California Department of Education, California Longitudinal Pupil Achievement Data System (CALPADS), Cumulative Enrollment Data (Academic Years 2016-2017, 2017-2018, 2018-2019, 2019-2020).

1. ONE-DAY HOMELESS COUNT

The San Mateo County Human Services Agency (HSA), in close collaboration with community partners, conducts the bi-annual One Day Homeless Count and Survey. The purpose of the One Day Homeless Count and Survey is to gather information to help the community understand homelessness in San Mateo County. This is one data set, among others, that provides information for effective planning of services to assist people experiencing homelessness and people at risk of homelessness.

TABLE 2-22 SAN MATEO COUNTY POINT-IN-TIME HOMELESS COUNTS

Year	Point-in-Time Count
2013	2,002
2015	1,483
2017	1,253
2019	1,512
<u>2022</u>	<u>1,808</u>

Source: San Mateo County [Human Services Agency, 2022](#); [Public Health](#).

According to the 2022 San Mateo County One Day Homeless Count³⁵ conducted in the early morning hours of February 24, 2022, there were 1,808 people experiencing homelessness in San Mateo County. This number includes: 1,092 people experiencing unsheltered homelessness staying on streets, in cars, in recreational vehicles (RVs), or in tents. 716 people experiencing sheltered homelessness staying in emergency shelters and transitional housing programs

This finding of 1,808 people experiencing homelessness is higher than the counts in 2015, 2017, and 2019, but lower than the counts in 2011 and 2013. The number of people experiencing unsheltered homelessness in 2022 is an increase of 191 (21%) compared to 2019. The number of people staying in shelters in 2022 is an increase of 105 (17%) compared to 2019.

Although the sheltered count has varied over time (including shifts due to HUD's definitional changes), it is the unsheltered count that has largely contributed to the overall number of homeless people in the county. According to the 2022 San Mateo County One Day Homeless Count and Survey, the number of people

³⁵ <https://www.smcgov.org/media/130616/download?inline=>



experiencing unsheltered homelessness in San Bruno in 2022 was 63. This is an increase from the same count conducted in 2019 of 12 unsheltered homeless, and 26 unsheltered homeless in 2017. The sixty-three unsheltered homeless persons that were counted in San Bruno in 2022, make up 6% of the 1,092 homeless unsheltered in the San Mateo County as a whole.

In 2006, San Mateo County developed a 10-Year Plan to Prevent and End Homelessness (HOPE Plan).³⁶ Key accomplishments of the HOPE Plan included the creation and expansion of Homeless Outreach Teams (HOT), new funding sources for homelessness prevention, Homeless Connect events, the creation of 994 new affordable housing units as well as the creation of 96 new units of permanent supportive housing, including projects developed by the Mental Health Association and units in projects developed by Mid-Pen Housing. The HOPE Plan focused on creation of new housing inventory as a key strategy to reduce homelessness, but these goals were not achievable given the local housing market.

In 2016 the county adopted a new San Mateo Homelessness Strategic Plan, Ending Homelessness in San Mateo County.³⁷ The 2016 plan draws on best practices to reduce homelessness given the existing supply of housing and focusing on short- and long-term housing assistance prioritized for people who are unsheltered. Expansion of the affordable housing supply remains a key priority for the community, but this work is being spearheaded by the Department of Housing along with other stakeholders and workgroups, including the Jobs/Housing Gap Task Force, Housing Leadership Council of San Mateo County, HEART of San Mateo and other efforts.

The County and its partners have expanded homeless services in recent years, including expansions in shelters, as well as expansions in homeless outreach services, rapid rehousing services, and enhancing connections between health services and homeless services. The County is also working on additional non-congregate shelter that will open later this year, including the Navigation Center and Stone Villa Shelter, which will both provide additional shelter capacity to provide safe shelter along with intensive support services to help residents move into permanent housing.

In addition, the County recently launched its Working Together to End Homelessness initiative, bringing together a wide array of stakeholders to collaborate on innovative strategies to provide housing and services to people experiencing homelessness. More information on Working Together to End Homelessness is available at SMCEndingHomelessness.org.

W. FARMWORKERS

Across the state, housing for farmworkers has been recognized as an important and unique concern. Farmworkers generally receive wages that are considerably lower than other jobs and may have temporary housing needs. Finding decent and affordable housing can be challenging, particularly in the current housing market. In San Bruno, there were no reported students of migrant workers in the 2019-20 school year. The trend for the region for the past few years has been a decline of 2.4% in the number of migrant worker students since the 2016-17 school year. The change at the county level is a 57.1% decrease in the number of migrant worker students since the 2016-17 school year.

³⁶ Housing our People Effectively (HOPE) Ending Homelessness in San Mateo County: HOPE 10-Year Plan.pdf (sanmateo.ca.us).

³⁷ Ending Homelessness in San Mateo County (July 2016): download (smcgov.org).

TABLE 2-23 MIGRANT WORKER STUDENT POPULATION

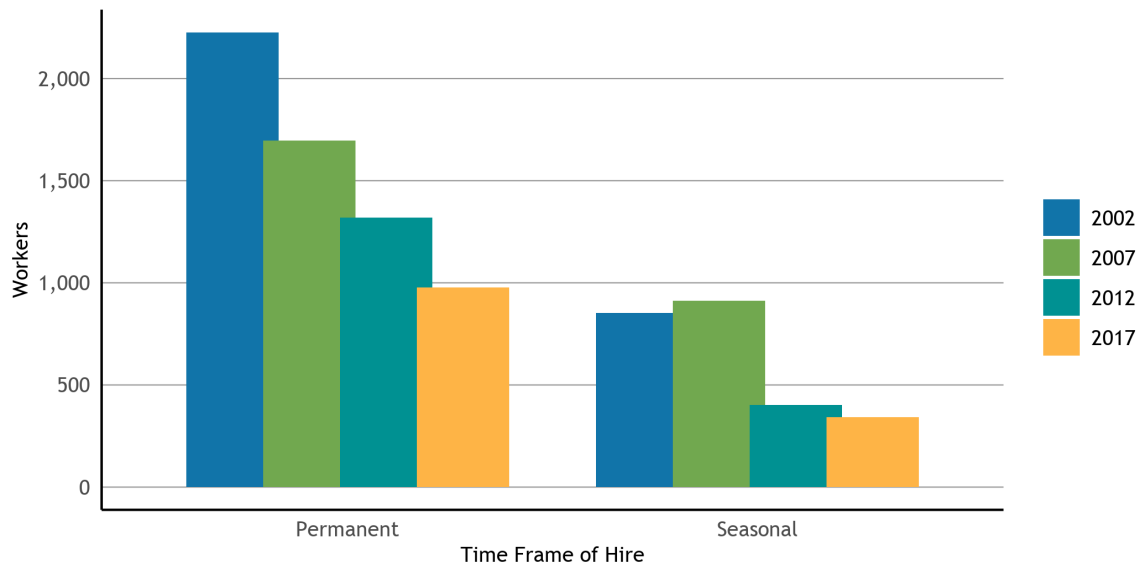
Academic Year	San Bruno	San Mateo County	Bay Area
2016-17	0	657	4.630
2017-18	0	418	4.607
2018-19	0	307	4.075
2019-20	0	282	3.976

Universe: Total number of unduplicated primary and short-term enrollments within the academic year (July 1 to June 30), public schools.

Source: California Department of Education, California Longitudinal Pupil Achievement Data System (CALPADS), Cumulative Enrollment Data (Academic Years 2016-2017, 2017-2018, 2018-2019, 2019-2020).

According to the U.S. Department of Agriculture Census of Farmworkers, the number of permanent farm workers in San Mateo County has decreased since 2002, totaling 978 in 2017, while the number of seasonal farm workers has decreased, totaling 343 in 2017 (Figure 2-45).

There are migrant worker students in the locality (282 in the entire county in 2019-2020 school year), permanent farmworkers (978 in the county in 2017) and seasonal farmworkers (343 in the county in 2017). All these numbers have been trending downward.

**Figure 2-45 Farm Operations and Farm Labor by County, San Mateo County**

Universe: Hired farm workers (including direct hires and agricultural service workers who are often hired through labor contractors).

Source: U.S. Department of Agriculture, Census of Farmworkers (2002, 2007, 2012, 2017), Table 7: Hired Farm Labor.

Farm workers who are migrant or seasonal workers have special housing needs because of their relatively low-income and the unstable nature of their job (i.e., having to move throughout the year from one harvest to the next). These workers generally face higher rates of overcrowding and other substandard housing conditions. Continued efforts to provide affordable housing, especially affordable housing

Farmworkers in San Bruno are often very low or extremely low-income households. Per the USDA, today's farmworkers can commute up to 75 miles to the workplace. They are also more likely to have families and are looking for schools, employment for a spouse/partner and a location to live in that provides a community. Because of this, they will benefit from the existing affordable housing programs in San Bruno. Additionally, San Bruno's participation in Doorway will ensure that new affordable housing listings are publicized in Spanish and that vacancy searches are mobile-friendly.

X. NON-ENGLISH SPEAKERS

California has long been an immigration gateway to the United States, which means that many languages are spoken throughout the Bay Area. Since learning a new language is universally challenging, it is not uncommon for residents who have immigrated to the United States to have limited English proficiency. This limit can lead to additional disparities if there is a disruption in housing, such as an eviction, because residents might not be aware of their rights or they might be wary to engage due to immigration status concerns. In San Bruno, 6.2% of residents 5 years and older identify as speaking English not well or not at all, which is below the proportion for San Mateo County. Throughout the region the proportion of residents 5 years and older with limited English proficiency is 8%.

Several programs in the Housing Element help address the gap in support to non-English speakers in the community. Goal 4 "Promote equity in housing, protect residents from displacement, and support the needs of households with low incomes or special needs" includes Program 4-A which calls for to multi-lingual marketing materials and ensuring bilingual interpretation services are available for fair housing outreach to landlords as well as renters as well as on the city's website.

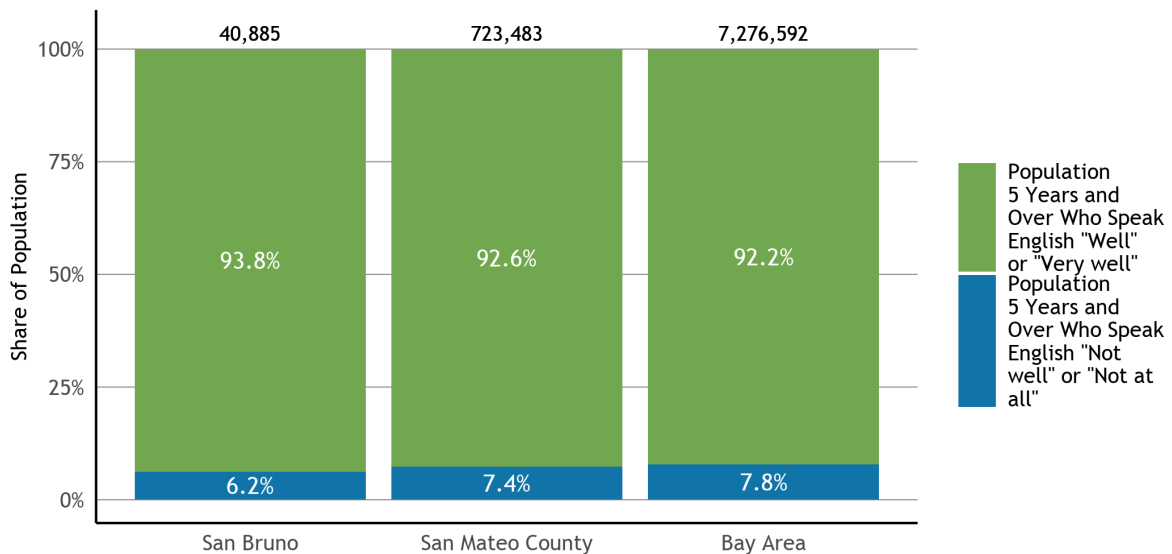


Figure 2-46 Population with Limited English Proficiency

Universe: Population 5 years and over.

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B16005.

For the data table behind this figure, please refer to the Data Packet Workbook, Table AFFH-03.

KEY POINTS SPECIAL HOUSING NEEDS: SENIORS, PEOPLE WITH DISABILITIES, FEMALE-HEADED HOUSEHOLDS, LARGE HOUSEHOLDS, EXTREMELY LOW-INCOME HOUSEHOLDS, HOMELESS, FARMWORKERS, NON-ENGLISH SPEAKERS

SENIORS

- The county can expect to see a 26 percent increase in the number of seniors between 2020 and 2030. For seniors over the age of 80, the percent increase is 56 percent. A key challenge in the coming years will be how to accommodate the needs of aging residents.
- 26 percent of senior households in San Bruno earn 0 percent-30 percent of AMI, and 44 percent of households earn below 50 percent AMI. Affordable housing options for these seniors are crucial.
- Seniors are significantly more likely to be homeowners than renters. Seniors need retrofits to allow them to age in place or stay in the community but in a smaller unit or with services available.

PEOPLE WITH DISABILITIES

- 8 percent of the total San Bruno population in the city has some kind of disability. In San Bruno, almost a third of the senior population has some kind of disability.
- There is a limited supply of handicap accessible, affordable housing generally, and the supply is especially tight near transit. People with disabilities are also often extremely low income due to the challenge of securing long-term employment, and to higher medical bills.

FEMALE HEADED HOUSEHOLDS

- Female-headed households, who may be supporting children or a family with only one income experience more housing insecurity (10 percent of the total households in San Bruno). San Bruno has 770 female-headed, single-parent households.
- The special needs of female-headed households can include low-cost housing, suitable for children and located near schools and childcare facilities.

LARGE HOUSEHOLDS

- If a city's rental housing stock does not include larger apartments, large households who rent could end up living in overcrowded conditions. San Bruno has approximately 1,500 households with five or more members. In 2017, 19.7 percent of large households were very low-income, earning less than 50 percent of the area median income (AMI).

EXTREMELY LOW-INCOME HOUSEHOLDS

- In San Bruno, 13.5 percent households EARN less than 30 percent of AMI are considered extremely low-income (ELI) and 2,023 households live below the poverty line.
- ELI are most likely facing overpayment, overcrowding or substandard housing conditions. The effects of COVID-19 have disparately harmed ELI households.

HOMELESSNESS

- According to the 2019 countywide homeless survey, there are 1,512 people experiencing homeless on a single night in San Mateo County. Of those, more than 900 were unsheltered and a significant number lived in RVs.
- The vast majority of homeless people are single adults. Most homeless people are white and male.

MIGRANT WORKERS

- In San Bruno, there were no reported students of migrant workers in the 2019-20 school year.

NON-ENGLISH SPEAKERS

- In San Bruno, 6.2 percent of residents 5 years and older identify as speaking English not well or not at all. This limit can lead to additional disparities if there is a disruption in housing, such as an eviction, because residents might not be aware of their rights, or they might be wary to engage due to immigration status concerns.



Y. ASSISTED HOUSING DEVELOPMENTS AT-RISK OF CONVERSION

While there is an immense need to produce new affordable housing units, ensuring that the existing affordable housing stock remains affordable is equally important. Additionally, it is typically faster and less expensive to preserve currently affordable units that are at risk of converting to market-rate than it is to build new affordable housing. The data in the table below comes from the California Housing Partnership's Preservation Database, the state's most comprehensive source of information on subsidized affordable housing at risk of losing its affordable status and converting to market-rate housing. However, this database does not include all deed-restricted affordable units in the state, so there may be at-risk assisted units in a jurisdiction that are not captured in this data table. Table 2-24 shows there are 323 assisted units in San Bruno in the Preservation Database. Of these units, 0.0% are at *High Risk* or *Very High Risk* of conversion.³⁸

TABLE 2-24 ASSISTED UNITS AT RISK OF CONVERSION

Income	San Bruno	San Mateo County	Bay Area
Low	323	4,656	110,177
Moderate	0	191	3,375
High	0	359	1,854
Very High	0	58	1,053
Total Assisted Units in Database	323	5,264	116,459

Universe: HUD, Low-Income Housing Tax Credit (LIHTC), USDA, and CalHFA projects. Subsidized or assisted developments that do not have one of the aforementioned financing sources may not be included.

Source: California Housing Partnership, Preservation Database (2020).

In 1989, the California Government Code was amended to include a requirement that localities identify and develop a program in their housing elements for the preservation of assisted, affordable multi-family units. Section 65583(a)(8) requires an analysis of existing housing units that are eligible to change from low-income housing uses during “the next 10 years” due to termination of subsidy contracts, mortgage prepayment, or expiration of restrictions on use. In the context of this Housing Element update, assisted units are considered “at-risk” of conversion to market rate if the expiration date of their financing program falls before 2033 (i.e., 10 years from the beginning of the housing element planning period—2023).

Assisted housing units are those that offer financial aid or provide extra services for people in need of financial or basic living assistance. San Bruno has three assisted housing developments, all of which were built during the 2000s: Archstone I (Meridian), completed in 2005; Archstone II (Paragon), completed in 2007; and Village at the Crossing, also completed in 2007. All three projects are rental apartments; the two Archstone developments are for all household types and the Village at the Crossing is for senior households only. The three projects received funding through a variety of sources including state bond tax-exempt financing, San

³⁸ California Housing Partnership uses the following categories for assisted housing developments in its database:

Very-High Risk: affordable homes that are at-risk of converting to market rate within the next year that do not have a known overlapping subsidy that would extend affordability and are not owned by a large/stable non-profit, mission-driven developer.

High Risk: affordable homes that are at-risk of converting to market rate in the next 1-5 years that do not have a known overlapping subsidy that would extend affordability and are not owned by a large/stable non-profit, mission-driven developer.

Moderate Risk: affordable homes that are at-risk of converting to market rate in the next 5-10 years that do not have a known overlapping subsidy that would extend affordability and are not owned by a large/stable non-profit, mission-driven developer.

Low Risk: affordable homes that are at-risk of converting to market rate in 10+ years and/or are owned by a large/stable non-profit, mission-driven developer.

Bruno Redevelopment Agency subsidies, and 4% tax credits. None of these developments is considered to be at-risk of conversion within the next 10 years. Sixty units at Archstone I will be affordable through 2060 and 37 units at Archstone II will be affordable through 2062. All units at the Village at the Crossing have 30-year affordability restrictions. Once those expire, there will be 105 units that have continued affordability restrictions through 2062 (11 low- and 94 moderate-income). The table below provides a summary of assisted affordable units in San Bruno today.

TABLE 2-25 ASSISTED HOUSING DEVELOPMENTS IN SAN BRUNO

Project	Address	Affordable Units	Total Units	Funding Program	Termination Date	Risk Level
The Crossing	853 East Commodore Drive	60	300	LIHTC	2059	Low
The Crossing Phase I	1101 National Avenue	113	114	LIHTC	2061	Low
The Crossing, Phase 2	1101 National Avenue	113	114	LIHTC	2062	Low
Archstone San Bruno II	1099 Admiral Court	37	185	LIHTC	2060	Low

Source: California Housing Partnership Preservation Database about "at-risk" deed-restricted affordable housing developments in the jurisdictions of San Mateo County

The California Housing Partnership Corporation (CHPC) assists nonprofit and government housing agencies to create, acquire, and preserve housing affordable to lower income households. CHPC maintains a database of units throughout California that use federal funding programs to maintain their affordability. According to CHPC, there are no at-risk affordable housing units in San Bruno listed in their database.

KEY POINTS: ASSISTED HOUSING UNITS AT-RISK AND ENERGY CONSERVATION STRATEGIES

- There are 323 assisted units in San Bruno in the Preservation Database. Of these units, none are at High Risk or Very High Risk of conversion. Because the projects were built more recently, and the deed restrictions apply for several decades, none of these developments are at-risk of conversion within the next 10 years.
- There are three main strategies a jurisdiction can employ to promote energy conservation: integrated land use and transportation planning; the adoption of green building standards and practices; and the promotion of energy conservation programs and choices.

1. QUALIFIED ENTITIES FOR AT-RISK PROPERTIES

An owner of a multi-family rental housing development with rental restrictions (i.e., is under agreement with federal, State, and local entities to receive subsidies for low-income tenants), may plan to sell their "at risk" property. HCD has listed qualified entities that may be interested in participating in California's First Right of Refusal Program. If an owner decides to terminate a subsidy contract or prepay the mortgage or sell or otherwise dispose of the assisted housing development, or if the owner has an assisted housing development in which there will be the expiration of rental restrictions, the owner must first give notice of the opportunity to offer to purchase to a list of qualified entities provided to the owner. HCD has listed six entities that may be interested in participating in California's First Right of Refusal Program in San Mateo County:

- ROEM Development Corporation
- Northern California Land Trust, Inc.
- Housing Corporation of America
- Mid-Peninsula Housing Coalition
- Affordable Housing Foundation
- Alta Housing (previously Palo Alto Housing Corp)



If a development becomes at risk of conversion to market-rate housing, the City will maintain contact with these organizations and housing providers who may have an interest in acquiring at-risk units and will assist other organizations in applying for funding to acquire at-risk units.

Program 4-F of this Housing Element provides for the adoption of an ordinance that provides for tenant and community first right of purchase or right of first refusal. Although the city doesn't have any affordable units at risk of conversion, Program 3-C proposes a revision to the Affordable Housing Ordinance to ensure that all new affordable housing remains affordable for 99 years or in perpetuity. Increasing the affordability term would prevent the loss of affordable housing in the future. Program 3-G requires replacement of below market rate units lost during any construction, redevelopment, or demolition projects in accordance with state law SB 8 (no net loss).

Z. ENERGY CONSERVATION

Conservation of energy is an important issue in housing development today not only due to the cost of energy, which can be a substantial portion of monthly housing costs for both owners and renters, but also due to an emerging interest in sustainable development, energy independence, and reduction of greenhouse gas emissions in line with new legislation such as AB 32 and SB 375. There are three main strategies a jurisdiction can employ to promote energy conservation: integrated land use and transportation planning; the adoption of green building standards and practices; and the promotion of energy conservation programs and choices. The following section describes opportunities for energy conservation.

1. INTEGRATED LAND USE AND TRANSPORTATION

Energy conservation can be a priority in the overall planning of a city's land uses and transportation systems. Planning to provide a range of housing types and affordability near jobs, services, and transit can reduce commutes, traffic congestion, and thus the number of vehicle miles traveled, and vehicle hours traveled. Promoting infill development at higher densities will also help reach these goals.

The San Bruno 2025 General Plan and the recently adopted Transit Corridors Specific Plan contain many new policies aimed to reduce energy use and associated greenhouse gas emissions, by reducing vehicle miles traveled and trips through infill and transit- and pedestrian-oriented residential and non-residential development (LUD-7, LUD-10, LUD-28, LUD-29, LUD-48); through encouraging alternatives modes of transportation (T-1, T-3, T-4, T-5) including an emphasis on improving options and infrastructure for bicycle use (T-69 through T-74); and through policies to increase energy conservation specifically through green design, retrofitting, and other incentives (PFS-62 through PFS-71). Most of these initiatives that support energy conservation also support the provision of affordable and accessible housing by locating residents near transit and other services, by increasing housing unit densities and varieties which can lower the cost of renting or owning, and by creating a complete transportation system that can accommodate households that cannot afford cars.

2. BUILDING DESIGN STANDARDS AND PRACTICES

There are many opportunities for conserving energy in new and existing homes. Construction of energy efficient buildings does not lower the purchase price of housing. However, housing with energy conservation features should result in reduced monthly occupancy costs as consumption of water and energy is decreased. Similarly, retrofitting existing structures with energy-conserving features can result in a reduction in utility costs.

STATE BUILDING CODE STANDARDS

The California Energy Commission was created in 1974 by the Warren-Alquist State Energy Resources Conservation and Development Act (Public Resources Code 25000 et seq.). Among the requirements of the law was a directive for the Commission to adopt energy conservation standards for new construction. The first residential energy conservation standards were developed in the late 1970s (Title 24, Part 6 of the California Code of Regulations) and have been periodically revised and refined since that time. In 2011, California added the California Green Building Standards Code (CALGreen) to the state's official building code. CALGreen is a new set of building codes, some mandatory, and some voluntary, for all new buildings and renovations. It is the first state level "green" building code to be implemented in the US.

San Bruno adopted the 2019 California Building Code, including the Green Building Code and related Energy Code in 2019. All building projects are held to these updated standards.

REACH CODES

In addition to California state required building codes, cities and counties may adopt more advanced, or enhanced, building codes, which are known as reach codes. Reach Codes are local amendments that exceed the Building Energy Efficiency Standards Code and Green Building Standards Code. The adoption of Reach Codes aims to reduce greenhouse gas emissions (GHGs) by reducing reliance on natural gas and gasoline through refocusing energy consumption towards electrification. California state law allows local governments to impose additional measures beyond the California Building Energy Efficiency and the Green Building Standards Codes through the adoption of Reach Codes. The State requires the Building Code to be updated every three years, with the next code cycle to be effective January 1, 2023. The City adopted a Reach Code ordinance in October 2022 to align with the next code cycle.

OTHER ENERGY CONSERVATION OPPORTUNITIES IN BUILDING STANDARDS AND PRACTICES

As described above, the San Bruno 2025 General Plan contains numerous policies that support the development and evolution of green building standards and practices in the city. Examples of energy conservation opportunities include weatherization programs and home energy audits; installation of insulation; installation or retrofitting of more energy-efficient appliances and mechanical or solar energy systems; and building design and orientation that incorporates energy conservation considerations.

For the purposes of this Housing Element, we can elaborate on ways that residential building design can be more energy efficient. Many modern design methods used to reduce residential energy consumption are based on proven techniques in use since the earliest of days of collective settlement. These methods can be categorized in three ways:

1. **Building design** that keeps natural heat in during the winter and keeps natural heat out during the summer. Such design reduces air conditioning and heating demands. Proven building techniques in this category include:
 - locating windows and openings in relation to the path of the sun to minimize solar gain in the summer and maximize solar gain in the winter;
 - use of "thermal mass," earthen materials such as stone, brick, concrete, and tiles that absorb heat during the day and release heat at night;
 - "burying" part of the home in a hillside or berm to reduce solar exposure or to insulate the home against extremes of temperature;

- use of window coverings, insulation, and other materials to reduce heat exchange between the interior of a home and the exterior;
 - locating openings and using ventilating devices to take advantage of natural air flow; and
 - use of eaves and overhangs that block direct solar gain through window openings during the summer but allow solar gain during the winter.
2. ***Building orientation*** that uses natural forces to maintain a comfortable interior temperature. Examples include:
- north-south orientation of the long axis of a dwelling;
 - minimizing the southern and western exposure of exterior surfaces; and
 - location of dwellings to take advantage of natural air circulation and evening breezes.
3. ***Use of landscaping features*** to moderate interior temperatures. Such techniques include:
- use of deciduous shade trees and other plants to protect the home;
 - use of natural or artificial flowing water; and
 - use of trees and hedges as windbreaks.

In addition to these design techniques, other modern or technology-based energy conservation methods include:

- use of solar energy to heat water;
- use of solar panels, photovoltaic technology, and other devices to generate electricity;
- window glazing to repel summer heat and trap winter warmth;
- weather-stripping and other insulation to reduce heat gain and loss; and
- use of energy efficient home appliances.

The city's abundant sunshine provides an opportunity to use solar energy techniques to generate electricity, heat water, and provide space heating during colder months, as well. Natural space heating can be substantially increased through the proper location of windows and thermal mass.

Program 2-Lof of this Housing Element promotes sustainable residential development that is energy efficient and reduces greenhouse gas emissions. It includes several actions focusing on adopting promoting energy efficiency and electrification incentives from PG&E, BayREN, and promoting water conservation and drought-resistant landscaping guidelines and standards.

AA. CONCLUSION

A home meets the standard definition of affordability if it does not cost more than 30% of a household's income. Housing that costs more than 30% of household income is a more acute problem for lower income households, since there is less discretionary money for other necessities. While individual household income conditions vary, an example can be useful to illustrate affordability conditions for a low-income family in San Mateo County. A four-person family with one parent working fulltime as a cook and the other parent working in retail can afford a monthly rent of about \$1,650 (assumes \$66,560 annual household income renting a two-bedroom apartment in San Mateo County) and a home sales price of \$260,000 (assumes a 3.5% down payment FHA loan). A single-parent family with the adult working as a police officer would be considered moderate-income (100% AMI or \$119,700) and can afford a monthly rent of about \$2,950 and a home costing \$465,000 (assumes a 3.5% down payment FHA loan). Neither of these example households can afford a median priced condominium in San Bruno, costing \$520,000 (SAMCAR, 2021 Annual Median Price), or single-family home, which costs \$1,377,500 (SAMCAR, 2021 Annual Median Sale Price) or the median city's rent for a two-bedroom of \$3,543 for 2021 (<http://www.selfsufficiencystandard.org/california/>).

The cost of living in the Bay Area continues to be significantly higher. The Family Economic Self-Sufficiency Standard measures the minimum income necessary to cover all non-elderly (under 65 years old) and non-disabled individuals or family's basic expenses—housing, food, childcare healthcare, transportation, and taxes without public or private assistance. Using this standard index, a family of four (2 adults and 2 children) will need to earn \$150,620 a year, in 2021, to live and sustain themselves in San Mateo County.³⁹ Though San Mateo County has a robust economy, much of its workforce cannot afford to live within the county.

As this chapter has demonstrated, despite a slowdown in population growth in recent years, additional housing is needed to accommodate housing demand among all income groups and in particular for lower income groups. Rising housing costs have contributed directly to the outmigration of residents to more affordable markets as well as displacement of existing lower income residents. Meanwhile, continued job growth has consistently fueled a tight housing market and higher housing costs. This Housing Needs Assessment focuses on identifying the housing needs in San Bruno and highlights some of the policies and programs (described in more detail in Chapter 7) that will help to address those needs.

³⁹ Home – Self Sufficiency Standard.



3 Housing Constraints and Resources



This chapter describes the potential constraints applied by local, state, and federal governments, the private market, infrastructure, and the natural environment to the timing or expansion of San Bruno’s residential development. Additionally, potential resources available through local, state, and federal programs are also discussed. This chapter is designed to address the requirements of Government Code Section 65583(a)(5).

Government regulations can potentially constrain the supply of housing available in a community if the regulations limit the opportunities to develop housing, impose requirements that unnecessarily increase the cost to develop housing, or make the development process so arduous as to discourage housing developers. State law requires housing elements to contain an analysis of the governmental constraints on housing maintenance, improvement, and development (Government Code Section 65583(a)(5)). Non-governmental constraints (required to be analyzed under Government Code Section 65583(a)(5)) cover land prices, construction costs, and financing. While local governments cannot control prices or costs, identification of these constraints can be helpful to San Bruno in formulating housing programs.

A. GOVERNMENTAL CONSTRAINTS

Housing affordability is affected by factors in both the private and public sectors. Although local ordinances and policies are enacted to protect the health and safety of citizens and further the general welfare, it is useful to periodically reexamine them to determine their continued relevance and if they constitute a barrier to the maintenance, improvement, or development of housing. Actions by the City can have an impact on the price and availability of housing in San Bruno. Land use controls, site improvement requirements, building codes, fees, and other local programs intended to improve the overall quality of housing may serve as a constraint to housing development. These governmental constraints can limit the operations of the public, private, and non-profit sectors, making it difficult to meet the demand for affordable housing and limiting supply in the region. All City zoning regulations, development standards, specific plans, and fees are posted online and available to the public, consistent with the requirements of Assembly Bill (AB) 1483. This section describes existing governmental constraints and the ways in which the City has worked to reduce or remove them over the last Housing Element cycle.

1. LAND USE REGULATIONS

SAN BRUNO 2025 GENERAL PLAN

The land use categories of the San Bruno 2025 General Plan allow residential growth at various density levels. The General Plan Land Use Diagram is included as Figure 3-1. Below is a summary of land use categories that allow residential use:

- **Very Low Density Residential.** Single-family detached residential development at a density of 0.1 to 2.0 units per acre; innovative development patterns, preservation of natural features, pedestrian paths, and other amenities are encouraged.
- **Low Density Residential.** Single-family detached development at a density of 2.1 to 8.0 units per acre; single-family attached development may be allowed where clustering permits additional open space.
- **Medium Density Residential.** Residential development at a density of 8.1 to 24.0 units per acre; allows for single-family detached and attached housing, small-lot and zero-lot-line development, and duplexes.
- **High Density Residential.** Allows single-family attached and multi-family residential development at a density of 24.1 to 40.0 units per acre; includes ancillary uses such as rooming and boarding houses, sanitariums, and rest homes.
- **Central Business District (Downtown Mixed Use).** Allows 3.0 base maximum floor-area-ratio (FAR) combined for all uses (residential and non-residential), with no separate residential density limitation. Downtown Mixed Use permits one or more of a variety of uses, including: retail sales; hotels; eating and drinking establishments; personal and business services; professional and medical offices; financial, insurance, and real estate offices; theaters and entertainment uses; educational and social services; and government offices. Active uses are required at the ground level, and residential use is permitted on second and upper floors only. Wholesale trade, drive-through facilities, and auto-related uses are prohibited.
- **Transit-Oriented Development (TOD).** Allows 2.0 base maximum FAR combined for residential and/or non-residential, and no FAR limit for parcels of 20,000 square feet or larger, as outlined in the Transit Corridors Plan. In addition to FAR limits, no maximum residential density is required for individual residential projects. This classification permits a variety of uses, either individually or in mix with other permitted uses, including retail sales; eating and drinking establishments; personal and business services; professional and medical offices; financial, insurance, and real estate offices; hotels and motels; educational and social services; government offices; and residential. This designation is generally applied in key corridors such as San Bruno Avenue and El Camino Real in areas with proximity to BART and Caltrain stations.
- **Multi Use – Residential Focus.** Allows 2.0 base maximum FAR combined for residential and/or non-residential, 3.0 maximum for parcels of 20,000 square feet or larger, with non-residential use not exceeding 0.6 FAR. Residential density shall not exceed 40.0 units per acre (before state-mandated affordable housing density bonus). The City may grant a discretionary bonus of up to 8.0 units per acre for projects that undertake public right-of-way streetscape improvements in accordance with criteria established by the City. Multi Use – Residential Focus extends south along El Camino Real from Crystal



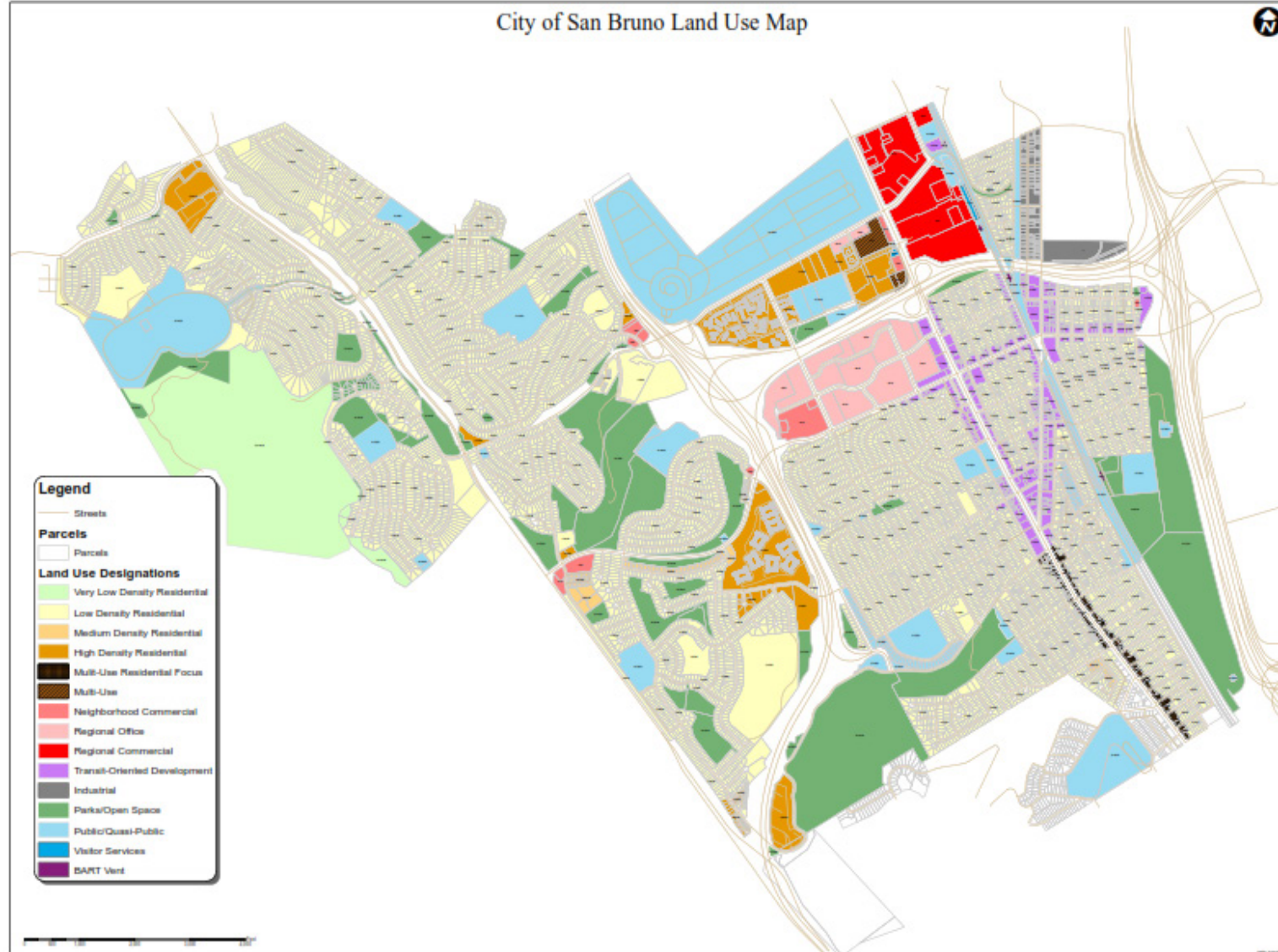


Figure 3-1 San Bruno 2025 General Plan Land Use Diagram

Source: City of San Bruno, General Plan, 2022.

Springs Road, placing emphasis on multi-family housing in new development projects. Multi Use – Residential Focus permits one or more of a variety of uses, including: multi-family and attached single-family housing; eating and drinking establishments; personal and business services; hotels and motels; and financial, insurance, and real estate offices. New retail uses are only conditionally allowed to ensure that such activities are concentrated in existing retail districts.

- **Neighborhood Commercial.** Residential units are conditionally permitted on upper floors as part of a mixed-use development with commercial uses; overall maximum FAR for all uses is 1.2 FAR (with no separate residential density limitation).
- **Bayhill Mixed-Use Overlay.** The Bayhill Shopping Center provides neighborhood-serving commercial goods and services to nearby residents as well as the Plan Area’s many office workers. Retaining and expanding retail shopping and other services is an important goal of the Plan. The site’s large surface parking area provides an opportunity for intensification of commercial use and the addition of housing. The Mixed-Use Overlay allows for residential development provided the current amount of commercial use on the site is not reduced. Housing may be developed in standalone buildings or above commercial space in a mixed-use building. A total of 210 units could be developed throughout the Bayhill Shopping Center and the adjacent property located at 899 Cherry Avenue.
- **Bayhill Residential Overlay.** The Residential Overlay provides for residential development on two properties (801-851 Traeger Avenue and 1111 Bayhill Drive) along the San Bruno Avenue frontage within Bayhill Regional Office. Housing may be provided combined with office uses permitted under the base BRO designation or as a standalone use, replacing office buildings. Up to 363 housing units are allowed. The amount of office square footage allowed on these sites is reduced when housing is built, as described in the Land Use Policies.

TRANSIT CORRIDORS PLAN

The City adopted the Transit Corridors Plan in February 2013 that focuses on high-density commercial and residential uses along the city’s transit corridor streets of El Camino Real, San Bruno Avenue, and San Mateo Avenue, adjacent to the Caltrain Station on San Bruno Avenue. The Plan implements the City’s 2009 General Plan Update which added transit-oriented development and mixed-use land use classifications. The Plan includes design guidelines, development regulations, parking standards, and an implementation strategy that will facilitate development of mixed-use projects in the area. The plan encourages ground floor commercial uses in areas with an existing strong retail concentration and at significant corner locations. Residential only uses are allowed. The plan provides for a maximum of 1,610 housing units within the plan area. Subsequent environmental review would be required to increase the maximum number of units. Most of the properties identified in the sites inventory in Chapter 7 are located within the TCP, accounting for 1,056 housing units. Staff anticipates that full build out of the sites inventory would exceed the 1,610 housing units analyzed in the TCP EIR.

PARKING

In 2020, the City updated its parking requirements by incorporating parking policies and regulatory measures as adopted in the City’s General Plan and Transit Corridors Plan into the Zoning Ordinance. The updated parking requirements allow various parking reduction options such as mechanical stackers, in-lieu fees, tandem parking configurations and a reduced parking requirement for multi-family residential uses. The standards applicable to residential uses is shown in Table 3-1 below. Prior to the ordinance change, two parking spaces were required for all new dwelling units in the city, regardless of dwelling unit type or location. A subsequent zoning code update in 2021 removed parking areas from counting against floor area



calculations. This change helped developers obtain more floor area in their projects for other uses, such as housing.

The community and economic development director shall determine the off-street parking requirements for a land use not listed in the parking table below. The director's determination may be based on off-street parking requirements of similar uses, or the director may require the preparation of a parking demand study and/or a TDM plan to determine the parking requirement for an unlisted use.

Neighborhood parking is a concern of San Bruno residents adjacent to the city's major commercial thoroughfares. Though San Bruno's updated parking requirements are similar to the parking requirements in other cities in San Mateo County, they could still be considered a barrier to the development of affordable housing. Recent development applications and inquiries indicate that a lower parking space per unit ratio has been requested by housing developers, usually one parking space per unit, or less, regardless of number of bedrooms. Fewer parking spaces can increase the affordability of housing by lowering construction costs and allowing more units, particularly when the housing is transit-accessible and caters to smaller households that have less demand for parking. As most of the opportunity sites in this Housing Element cycle are infill redevelopment in transit accessible commercial corridors, this finding may apply to many of these parcels. Since the City requires a minimum of 15% of units in every development to be affordable units, developers are consistently requesting a reduction in parking by requesting a concession pursuant to state density bonus law and generally providing parking at a 1:1 ratio. Furthermore, AB 2097, which eliminates minimum parking requirements for all uses located within a ½-mile of public transit, will take effect on January 1, 2023. This legislation would impact most of the housing sites identified in the sites inventory.

TABLE 3-1 RESIDENTIAL PARKING REQUIREMENTS

Use Category	Land Uses	Number of Required Parking Spaces
General Residential	Multi-Family Residential Units (Rental or Condominiums)	Studio and one-bedroom units: one space per unit Two or more-bedroom units: two parking spaces per unit Guest parking: one space per 10 units
	Single-Family Homes, Duplexes, and Triplexes	Two covered off-street parking spaces, defined as two-car garage or carport spaces, per dwelling unit

Source: City of San Bruno Community Development Department, Zoning Ordinance, 2022.

PLANNED DEVELOPMENT DISTRICT

The purpose of the P-D Planned Development District is to allow a mixture of land uses, density, or design relationships with a more flexible approach than is otherwise permitted in the City's base zoning regulations. The P-D process is initiated by the property-owner/developer, at which time the City Council establishes a P-D district based on a preliminary development plan. A Planned Development Permit is then issued for all uses within the district, which in turn allows the City and the developer flexibility in development standards and provision of amenities. Additionally, because land use planning, design, and environmental review occur simultaneously, the P-D zone enables the City to approve multiple uses in one consolidated process.

San Bruno's largest Planned Development site is the former U.S. Navy site, now called The Crossing. Since 1999, the City has worked with the developer and consultants to prepare a U.S. Navy Site and Its Environs Specific Plan (January 2001, amended January 2002 and August 2005), entered into a Development Agreement (February 2002), and has granted building permits for all four phases of residential construction, resulting in the completion of 1,063 multi-family apartments. All four phases are complete as of 2011. Other large Planned Development projects under construction or approved include Skyline College, approved for

70 units in 2018 and completed in 2022, and Mills Park, approved for 427 units in 2020 and currently awaiting building permit submittal.

While the P-D allows development flexibility, it is a lengthier review process since it is a legislative act that requires City Council approval.

COMPREHENSIVE AIRPORT LAND USE COMPATIBILITY PLAN FOR THE ENVIRONS OF SAN FRANCISCO INTERNATIONAL AIRPORT (SFO ALUCP)

San Francisco International Airport (SFO) is located just east of San Bruno and is a major housing development constraint for neighborhoods located in the eastern portion of the city. The purpose of the SFO ALUCP is to provide for the orderly growth of the airport and the surrounding areas to minimize the public's exposure to excessive noise and safety hazards. The SFO ALUCP is administered by the Airport Land Use Commission (ALUC) which is given authority to specify how land near airports is to be used based on the following concerns:

- *Aircraft Noise Impact Reduction* – To reduce the potential number of future airport area residents who could be exposed to noise impacts from airport and aircraft operations.
- *Safety of Persons on the Ground and in Aircraft in Flight* – To minimize the potential number of future residents and land use occupants exposed to hazards related to aircraft operations and accidents.
- *Height Restrictions/ Airspace Protection* – To protect the navigable airspace around the Airport for the safe and efficient operation of aircraft in flight.
- *Overflight Notification* – To establish an area within which aircraft flights to and from the Airport occur frequently enough and at a low enough altitude to be noticeable by sensitive residents. Within this area, real estate disclosure notices shall be required, pursuant to state law.

California law requires that, after an ALUC has adopted its ALUCP, affected local governments must update their general plans, specific plans, and land use regulations to be consistent with the ALUCP. Alternatively, local governments may take steps, provided by law, to override part or all of the ALUCP as it relates to their jurisdiction. If the local government fails to take either action, then it must submit all land use development actions or facility master plans within the airport influence area to the ALUC for review (Public Utilities Code [PUC] Section 21676.5(a)). San Bruno is required to submit all land use development actions and master plans, including this Housing Element, to the ALUC for review. If any portion of the plan is found to be inconsistent with the SFO ALUCP, then the ALUC will determine the project inconsistent with their policies and the City will be notified of the inconsistency. If the City wants to adopt the Housing Element without changing it to address the ALUC's determination, then it may override the ALUC's decision with a two-thirds vote of its governing body. San Bruno is proposing housing at the Tanforan site, which is an incompatible land use per the ALUCP due to noise, so the City anticipates needing to approve an ALUC override. Figure 3-2 shows the SFO ALUCP Map of Noise Compatibility Zones and the location of the Tanforan site within the zones.

With knowledge of the site constraints imposed by the SFO ALUCP, City Council adopted the Reimagining Tanforan Fact Sheet on July 27, 2021, articulating its vision for the redevelopment of Tanforan. The document included a vision of 1,000 housing units on the site in addition to other uses, signifying the City's support for housing on the site through a master planning process.

Staff anticipates commencing with the ALUC review process in Fall 2022. The local override would be considered by Council at the same time as the Housing Element adoption. *

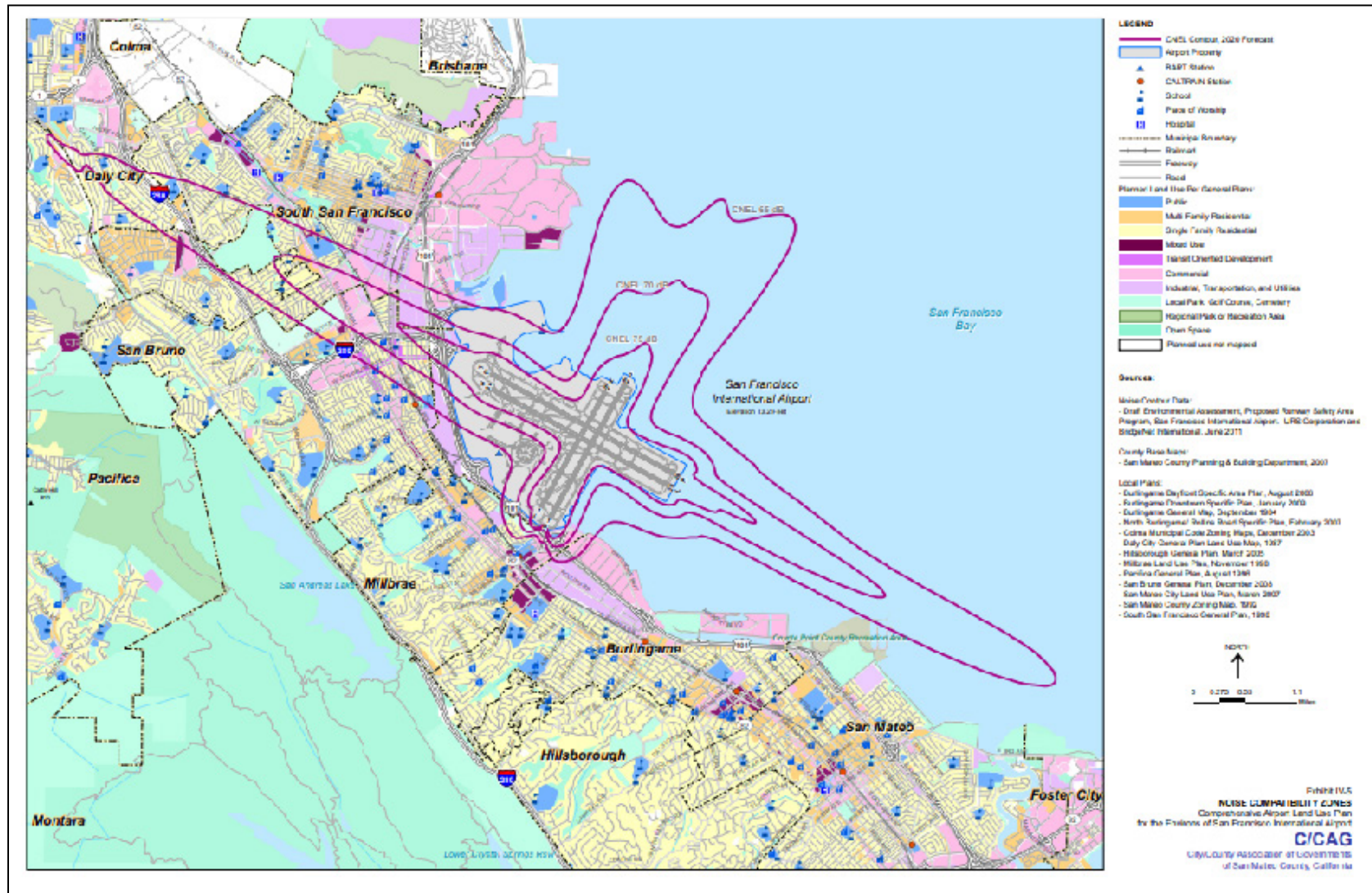


Figure 3-2 SFO ALUCP Map of Noise Compatibility Zones

Source: Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport, November 2012.

ZONING REGULATIONS

In March of 2021, San Bruno completed Phase II of the Zoning Code update. Among the many updates made was the rezoning of properties within the Transit Corridors Plan Area for consistency with the General Plan and the specific plan itself. A summary of the City's zoning development standards is shown in Table 3-2. Since the rezoning was completed, the City has received 4 housing development proposals.

Within the mixed-use zoning districts, requirements mirroring the TCP development standards such as setbacks and stepbacks are included. Providing more objective design standards, with flexibility, would provide a more certain entitlement structure for the development community. A program has been added to adopt objective design standards.

The development standards for the residential districts rely upon the residential density for the General Plan land-use classification, which is applicable when developing large sites, such as the Engvall and Glenview Terrace projects, and an FAR is prescribed in R-1 and R-2 districts to control building size. There is no prescribed FAR within R-3 and R-4 districts. Minimum yard and lot coverage requirements are then applied in all residential districts. Other than FAR, the City has identified the minimum lot area per dwelling unit requirement in residential districts as an impediment to the creation of additional housing units. A standard size lot in San Bruno is 5,000 square feet. Since the lot area required per unit is 2,900 square feet in the R-2 zone, a standard size lot would not be permitted to have two dwelling units. A standard size lot in a R-3 district would only be permitted to have two dwelling units since the minimum lot area per unit is 1,950 square feet. A standard size lot in a R-4 district would be permitted to have three dwelling units, since the minimum lot area required per unit is 1,450 square feet. Permitting two dwellings in the R-2 District, regardless of lot size, would make it feasible to add more housing in the district. Additionally, base FAR requirements (.55 is the base FAR requirement), which generally allow 2,750 square feet of gross floor area and 2,200 square feet of lot coverage for a 5,000 square foot lot, are the same floor area standards applicable to the R-1 district, and apply regardless of housing type. The FAR requirement could be relaxed in the R-2 District to provide more development potential. This change would require a General Plan amendment to increase the residential density for the low-density residential land-use classification. Furthermore, this increase in the number of dwelling units per acre would require a vote of the people pursuant to Ordinance 1284, discussed later in this chapter. Other development standards (e.g., front and side setback, rear yard) for residential districts are comparable to development standards in other San Mateo County jurisdictions and are not perceived to be constraints to housing development.

DEVELOPMENT DENSITY

During the last cycle of 2015 through 2023, San Bruno entitled over 703 housing units in major residential projects. Six-hundred and four of those units were attached multi-family units and the remaining 99 units were in two residential subdivisions (Skyline College, Glenview Terrace). All of the sites were approved at the maximum density permitted by the zoning district. The TCP sites are not subject to dwelling unit density restrictions, which accounts for most of the multi-family sites. 271 El Camino Real is the only multi-family site subject to dwelling unit density restrictions (40 units per acre), and it was approved at the maximum density. The residential subdivisions were rezoned as part of the project entitlement with approved densities exceeding Low-density Residential requirements (2.1 – 8.0 units/acre). The Skyline College subdivision is unique because it included both a detached single-family component and a multi-family component. For detached single-family subdivisions, developers generally request smaller lot development, 3,300 square feet on average as opposed to 5,000 square feet., and relaxation of setback and yard requirements. What these approved projects show is that developers are interested in developing residential units to the highest density permitted.



TABLE 3-2 CITY OF SAN BRUNO PROPERTY DEVELOPMENT REGULATIONS FOR RESIDENTIAL DISTRICTS

	R-1/R-1-D	R-2	R-3	R-4
Minimum Building Site Required (sq ft)	5,000 interior lot 6,000 corner lot	5,000 interior lot 6,000 corner lot	5,000 interior lot 6,000 corner lot	5,000 interior lot 6,000 corner lot
Minimum Lot Area per Unit (sq ft)	n/a	2,900	1,950	1,450
Minimum Lot Width (ft)	50 interior lot 60 corner lot	50 interior lot 60 corner lot	50 interior lot 60 corner lot	50 interior lot 60 corner lot
Maximum Lot Coverage	80% impervious surface 40% structures	85% impervious surface 55% structures	85% impervious surface 60% structures	85% impervious surface 60% structures
Minimum Yards (ft)				
Front	15	15	15	15
Side	5 interior sides 10 street sides	5 interior sides 10 street sides	5 interior sides 10 street sides	5 interior sides 10 street sides
Rear	10	10	10	10
Minimum Setback from Sidewalk to Garage (ft)	20	20	20	20
Maximum Height (ft)	26 – 30	26 - 30	50 ft or 3 stories, whichever is most restrictive	50 ft or 3 stories, whichever is most restrictive
Parking (see parking Table 3-1 above)				

Source: City of San Bruno Community Development Department, Zoning Ordinance, 2022.

TABLE 3-3 CITY OF SAN BRUNO PROPERTY DEVELOPMENT REGULATIONS FOR MIXED-USE DISTRICTS

	CBD	TOD-S	TOD-1	TOD-2	CC	MX-R
Maximum Storefront Width (ft)	25	100	100	100	100	100
Maximum FAR						
Parcels less than 20,000 sq ft	2.0	2.0	2.0	2.0	2.0	2.0
Parcels 20,000 sq ft or greater	n/a	n/a	n/a	n/a	n/a	Residential: 3.0 Nonresidential: 0.6
Minimum Setbacks (ft)						
Front	10	5	5	5	15	5
Street Side	5	5	5	5	10	5
Rear if adjacent to R-1 or R-2	10	10	10	10	10	10
Minimum Stepbacks (ft)						
Facing Corridor Street	15 ft above 3rd story	15 ft above 4th story	15 ft above 3rd story	15 ft above 4th story	15 ft above 4th story	n/a
Adjacent to R-1 or R-2	15 ft above 3rd story	15 ft above 3rd story	15 ft above 3rd story	15 ft above 3rd story	15 ft above 3rd story	n/a
Maximum Height (ft)	55 ft and 5 stories	65 ft and 5 stories; 90 ft or 7 stories ^a	65 ft and 5 stories	70 ft and 5 stories	70 ft and 5 stories	50 ft and 3 stories
Minimum Required Open Space (sq ft) per Residential Unit	40	40	40	40	40	40
Parking Location and Buffers						
Surface	Shall be located to the rear or side of buildings. May not be located between a building and a street-facing property line.					
Underground (Partially)	May match the setbacks of the main structure. The maximum height of a parking podium is 5 ft from finished grade.					
Underground (Completely)	No setbacks requirement. Shall accommodate installation of private utilities on private property and dedicate public utility easements, as needed.					
Surface Adjacent to Street-Facing Property Line	Shall be screened along the public right-of-way with a decorative wall, hedge, trellis, and/or landscaping at least 3 ft.					
Landscaped Buffer	At least 3 ft in width and 6 ft in height shall be provided for any surface parking lot abutting a residential zoning district.					
On-Site Loading Area	Shall be located to the side and rear of buildings and shall be sufficiently screened from the public right-of-way.					

^a Maximum building height allowed west of San Mateo Avenue.

Source: City of San Bruno Community and Economic Development Department, Zoning Ordinance, 2022.



REASONABLE ACCOMMODATIONS

Both the Federal Fair Housing Act (FHA) and the California Fair Employment and Housing Act (FEHA) mandate that cities include “reasonable accommodations” in their land use regulations when necessary to provide housing for disabled persons (42 U.S.C. Section 3604(f)(3)(B); Government Code Section 12927(c)(1), 12955(1)). Reasonable Accommodation is to provide reasonable exceptions to zoning and land use regulations (such as minimum setbacks) if the reason is for improving the accessibility of one’s home. These fair housing requirements are included in California’s Title 24 regulations, which are currently enforced by the City through its Zoning Ordinance (SMBC 12.240), building codes, plan review, and site inspections processes.

The San Bruno City Council adopted a Reasonable Accommodation Ordinance in 2014 (Ordinance 1825), amending the City’s Zoning Ordinance to provide exceptions in zoning and land use for housing for persons with disabilities in compliance with state law. A request for reasonable accommodation may be made by any person with a disability, their representative, or any entity, when the application of the zoning ordinance or other land use regulations, policy, or practice acts as a barrier to fair housing opportunities. The ordinance requires a separate application and allows the community development director or designee to grant a reasonable accommodation request based on consideration of the following findings:

- A. Whether the housing which is the subject of the request will be used by an individual with a disability thereunder;
- B. Whether the request for reasonable accommodation is necessary to make specific housing available to an individual with a disability;
- C. Whether the requested reasonable accommodation would impose an undue financial or administrative burden on the City;
- D. Whether the requested reasonable accommodation would require a fundamental alteration in the nature of a city program or law, including but not limited to land use and zoning;
- E. Potential impacts on surrounding uses;
- F. Physical attributes of the property and structures; and
- G. Other reasonable accommodations that may provide an equivalent level of benefit.

Reasonable accommodation requests that are consistent with setback exceptions can be approved ministerially at time of building permit review. For example, a request for building a wheelchair ramp is processed over the counter and requires only a building permit if it complies with the Code exception which allows a ramp to extend 6 feet into the 15-foot front yard setback. Additionally, all building permits submitted in San Bruno are reviewed against the current California Building Code, as adopted by the City. No local amendments to these codes would diminish the ability of the City to accommodate persons with disabilities. Retrofits and building improvements made according to the Americans with Disabilities Act (ADA) are reviewed by the Building Division.

RESIDENTIAL CARE FACILITIES (INCLUDING SUPPORTIVE AND TRANSITIONAL HOUSING)

Health and Safety Code Sections 1267.8, 1566.3, and 1568.08 require local governments to treat licensed group homes and residential care facilities with six or fewer residents no differently than other by-right single-family housing uses. “Six or fewer persons” does not include the operator, the operator’s family, or persons employed as staff. Local agencies must allow these licensed residential care facilities in any area zoned for residential use and may not require licensed residential care facilities for six or fewer persons to obtain conditional use permits or variances that are not required of other family dwellings.

The City updated its Zoning Ordinance in March 2021 to ensure consistency with fair housing laws. The update included an amendment to regulate “special residential care facilities” that is consistent with state law. Residential care facilities of any size are allowed by right in the R-1, R-2, R-3, and R-4 residential zones. “Residential care facility” means a licensed residential facility providing social and personal care for residents. Examples include children’s homes, supportive and transitional houses, orphanages, rehabilitation centers, self-help group homes, and transitional housing for homeless individuals. The definition of a residential care facility excludes facilities where medical care is a core service provided to residents, such as nursing and convalescent homes. A large residential care facility is a residential care facility for seven or more persons. A small residential care facility is a residential care facility for less than seven persons. Regardless of the number of patients allowed in a residential care facility, residential care facility is seen the same as any residential use. The Fire Department and Building Division inspect the residential care facility for compliance with codes as part of the building permit process. No noticing (or community input) is required for the establishment of a new or renovated residential care facility. Unlicensed residential facilities are subject to the same permitting requirements but must obtain a license from the state licensing agency before commencing operation.

Residential care facilities are allowed in any zoning district in San Bruno and there is no requirement for minimum distances from one to another residential care facility. There is no explicit requirement that would preclude a specific type of special residential care facility to be established, which could include supportive, transitional, or emergency housing. Supportive and transitional housing are permitted just as any other residential uses. Residential care facilities differ from boarding homes which are dwellings, other than a hotel, where lodging and meals for three or more persons is provided for compensation with a host for a rental period of thirty or more consecutive calendar days.

2. ORDINANCE 1284 HEIGHT AND DENSITY LIMITS

Ordinance 1284 was adopted by City Council in June 1977 and imposed city-wide height and density limits that constrain higher density residential development in the city. The Ordinance was intended to preserve the existing character of San Bruno by requiring voter approval for certain buildings.

Under Ordinance 1284, permits and approvals cannot be issued to allow construction of the following types of buildings, projects, and improvements, unless approved by a majority of voters at a regular or special election:

- Buildings or other structures exceeding 50 feet in height.
- Buildings or other structures exceeding three stories in height.
- Buildings or other structures, modifications or redevelopment thereof in residential districts which increase the number of dwelling units per acre or occupancy, within each acre or portion thereof, in excess of limits permitted on October 10, 1974, under the then existing Zoning Chapter of the City of San Bruno;
- Multi-story parking structures or buildings; or
- Buildings or other structures, modifications, or redevelopment thereof which encroach upon, modify, widen, or realign the following streets hereby designated as scenic corridors: Crystal Springs Road between Oak Avenue and Junipero Serra Freeway, or Sneath Lane from El Camino Real to existing westerly city limits.

Each of the five restrictions under Ordinance 1284 places additional limits regarding future residential development within the city. However, the City has a considerable amount of housing capacity within the TCP area that is also within close proximity to public transit to facilitate future housing production.

Ordinance 1284 is most restrictive to existing residential zoned parcels because of the limits imposed on increased densities (See below for a description of the treatment of second units specifically). This is because the ordinance was designed as a preservation measure. However, Ordinance 1284 is not considered a major constraint to affordable housing development in this Housing Element because most identified housing opportunity sites are located in the



TCP area where height limits have increased due to the passage of Measure N, as described in the next section below. Height limits of 50 feet still apply in other parts of the city, but in general the provisions of Ordinance 1284 are limited in scope and applicability for these parcels. For instance, Ordinance 1284 does not prohibit any of the following along the target corridors:

- Rezoning areas from commercial to residential use at any residential density standard.
- Permitting mixed-use development on commercially zoned properties at any residential density standard.
- Residential redevelopment on former school sites, consistent with zoning; and
- Below ground (more than 50% below grade) parking facilities.

Ordinance 1284 impacts existing low-density residential housing sites such as the former Engvall school site. Per Ordinance 1284, the Engvall school site, which has a low-density General Plan designation, cannot be upzoned to increase the number of dwelling units per acre. However, a planned unit permit (PUP) can be utilized to encourage creative use of land and open space by permitting carefully controlled relief from the strict application of the provisions of existing zoning districts. The PUP allows flexibility and diversification in the relationship of various buildings, structures, and open spaces in planned building groups. While the PUP can be used to create attached single-family dwellings, it cannot be used to increase overall housing density or create multi-family housing.

Due to the built-out nature of San Bruno, the ability to construct multi-story parking structures in other parts of the city is limited less by Ordinance 1284 than by available parcel size. More likely candidates for parking facilities are in the TCP area where development sites have the potential for consolidation, such as the San Bruno Gas site adjacent to the Bedroom Express site. The passage of Measure N has removed the constraints to constructing above-ground multi-story parking structures in the TCP area.

Potential constraints to housing development as a direct result of declaring Crystal Springs Road and Sneath Lane as scenic corridors are also minimal. Major adjacent properties include the Golden Gate National Cemetery, City Park, Junipero Serra County Park, and interstate highway rights-of-way, all of which are already unsuitable locations for housing development. Moreover, the designation of these two roadways does not prohibit development, but merely the widening of the roadways themselves.

Although high densities are permitted by the General Plan along major corridors (with no limit on density for individual development projects in the TOD designation), some development professionals have indicated that the building height limit of Ordinance 1284 (50 feet and three stories) is a potential constraint on the feasibility of developing high-density housing along commercial corridors outside of the TCP area.

Sites identified in this Housing Element are feasible at the specified densities whether or not Ordinance 1284 remains in effect. However, changes to Ordinance 1284 would make the development of housing throughout the community more economically feasible outside of the identified sites.

3. MEASURE N

The City Council placed a ballot measure, Measure N, the Economic Enhancement Initiative, on the November 4, 2014 ballot to amend Ordinance 1284 and facilitate the implementation of the Transit Corridors Plan. San Bruno voters approved Measure N overwhelmingly with 67.3% of the vote. The revised development standards allowed the development of multi-family housing along major commercial streets within about a ½-mile of the new San Bruno Caltrain station.

Measure N modifies Ordinance 1284 to permit the following:

- Buildings exceeding the current 50-foot or three-story maximum height as follows: up to 70 feet or five stories along El Camino Real, up to 65 feet or five stories along San Bruno Avenue, up to 55 feet or four stories along San Mateo Avenue, and up to 90 feet or seven stories in the Caltrain station area.

- Rezoning of 42 low-density residential parcels to become a part of the TCP area and allow higher density residential development.
- Above-ground, multi-story parking garages.

A similar effort to Measure N would need to be approved by voters to increase heights outside the Transit Corridors Plan boundaries or increase residential densities in any of the city's residential districts. As previously stated, none of the density assumptions for the sites identified in the inventory in Chapter 7 are dependent on changes to Ordinance 1284. It is mentioned here as an option requiring further exploration.

4. ACCESSORY DWELLING UNITS (ADUs)

Ordinance 1898, adopted by City Council in March 2021, makes the City's ADU Ordinance consistent with state ADU laws. ADU applications are processed through a ministerial process, without discretionary review or hearing. Most ADUs were approved without any additional parking. ADU size and setback requirements are consistent with state law, but larger units would be subject to additional review. ADUs over 750 square feet are subject to the City's development impact fees at a proportional rate.

The City issued building permits for 68 ADUs in 2021, a significant increase over the previous year. A potential reason for the substantial increase is that in 2020 the City was still requiring a separate planning review for ADUs and 51 ADU approvals were issued but only seven were issued building permits. ADU production is measured based on building permits issued. The City removed the two-step review process in March 2021, no longer requiring a separate ADU planning entitlement process which has led to a significant increase in building permits issued for ADUs in 2021, even though the overall number of ADU applications submitted remained consistent. Projecting forward, staff estimates ADU construction to be more in line with the City's 2020 and 2021 production of 51 to 68 units per year.

5. MANUFACTURED AND FACTORY-BUILT HOUSING

State law limits the extent to which cities and counties can regulate the installation of manufactured homes, including mobile homes. Government Code Section 65852.3 requires that cities allow installation of certified manufactured homes on foundation systems on lots zoned for conventional single-family residences. This section and Government Code Section 65852.4 generally require that manufactured homes be subject to the same land use regulations as conventional homes. Government Code Section 65852.7 deems mobile home parks to be a permitted use in all areas planned and zoned for residential use. Manufactured and factory-built housing is permitted in all residential zoning districts. Because of the high cost of land, manufactured housing is not commonly placed on private property. Currently, there are no known mobile homes or manufactured residences in San Bruno. There are no mobile home parks. Pursuant to state law, any site that can be developed for site-built residential development is also available for the development of factory-built (manufactured) housing or for mobile homes. There are no specific restrictions upon the development of manufactured housing or mobile home parks within the code but they must comply with the Residential Design Guidelines if located within the R-1 or R-2 residential zones.

6. EMERGENCY SHELTER

The California Health and Safety Code (Section 50801[e]) defines an emergency shelter as "housing with minimal supportive services for homeless persons that is limited to occupancy of six months or less by a homeless person. No individual or household may be denied emergency shelter because of an inability to pay." In 2015, the City amended the Municipal Code to create an Emergency Shelter Overlay which permits emergency shelters by right in the M-1 district. The sites in the M-1 District have mainly light industrial, auto repair, manufacturing activities that are separated from established residential neighborhoods.

Catholic Worker Hospitality House operates the city's only emergency homeless shelter on the grounds of St. Bruno's Catholic Church at 555 W. San Bruno Avenue. Every night they operate a year-round emergency homeless



shelter with space for up to nine guests. Guests usual stay from 2-3 weeks, but length of stay varies according to guest circumstances. In addition to operating a homeless shelter, five mornings a week they operate a free dining room for 70 - 80 guests. Guests can also use the shower, get food to go, and see about availability in their homeless shelter.

The City will annually review and amend as necessary the Municipal Code to ensure consistency with State Housing Government Code requirements and remove or lessen constraints on new housing development, and to require sufficient parking to accommodate all staff working in the emergency shelter, provided that the standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone, in compliance with Government Code Section 65583(a)(4)(A)(ii). Furthermore, the City will adopt development standards for emergency shelters and ensure they are consistent with State law per California Government Code Section 65583(a)(4)(A)(ii).

7. LOW-BARRIER NAVIGATION CENTERS

Government Code section 65662 requires that the development of Low-Barrier Navigation Centers be developed as a use by right in zones where mixed-uses are allowed or in non-residential zones that permit multi-family housing. For a navigation center to be considered “low barrier”, its operation should incorporate best practices to reduce barriers to entry, which may include, but is not limited to, the following:

- Permitting the presence of partners if it is not a population-specific site, such as for survivors of domestic violence or sexual assault, women, or youth.
- Pets.
- Ability to store possessions.
- Providing privacy, such as private rooms or partitions around beds in a dormitory setting or in larger rooms with multiple beds.

A program has been included to comply with State Law allowing low-barrier navigation centers for the homeless by right in zones that allow for mixed-use and nonresidential zones permitting multi-family uses, per Government Code Section 65662.

8. SHORT-TERM RENTALS

In 2020, the City adopted a short-term rental ordinance to establish regulations governing the short-term rental of residential dwelling units in order to ensure proper regulation of their use. At that time, the City identified 222 short term rentals in the city. The daily average room rental rate was about \$102, and the daily average house rental rate was \$262. The highest concentration of existing short-term rentals was found near the downtown and near the Caltrain station. This area of the city is more attractive for short term rentals because it is more accessible to airport staff who often need places to sleep temporarily while working. The area is also attractive because of its proximity to major transit stops that provide access to San Francisco, thus serving as a more affordable option to staying in San Francisco. Though clearly short-term rentals remove housing from the housing stock, more research would be needed to determine if short-term rentals are having a major impact on housing supply in the city.

9. HOUSING FOR EXTREMELY LOW-INCOME HOUSEHOLDS

AB 2634 requires the quantification and analysis of existing and projected housing needs of extremely low-income households. Extremely low-income households typically comprise persons with special housing needs, including, but not limited to, persons experiencing homelessness or at risk of homelessness, persons with substance abuse problems, and farmworkers. Housing Elements must also identify zoning to encourage and facilitate supportive housing and single-room occupancy units. Currently, there are no single-room occupancy units in San Bruno and the

use is not explicitly mentioned in the code. A program has been included to assist with the development of single-room occupancy units.

10. EMPLOYEE HOUSING

Consistent with Health and Safety Code Sections 17021.5 and 17021.6, employee housing is permitted by right in every residential zone, including single family zones. Currently, there are no known employee housing units in San Bruno and the use is not explicitly mentioned in the code. A program has been included to permit employee housing by right in residential districts.

11. BUILDING CODE ENFORCEMENT

The Building Department in conjunction with Code Enforcement is responsible for enforcing both state and City regulations governing maintenance of all buildings and property. The purpose of code enforcement of housing in need of rehabilitation is to ensure the safety of the City's residents; without basic living standards being met, life and safety are threatened. The City does have a code enforcement division to address health and safety concerns in the community. The code enforcement division will respond to complaints and investigate violations to ensure compliance with the City's Municipal Code. Complaints can be submitted by a neighbor or other resident who is affected by the violation. Violations can be reported by calling the code enforcement division or by submitting a complaint form, which is available on the City's website. The code enforcement division also helps educate property owners who are the subject of a violation how to reach compliance. A program has been included for the Community and Economic Development Department to regularly meet with the Code Enforcement Division to review housing violations.

12. DEVELOPMENT REVIEW PROCESS

Generally, all projects undergo a development review process through the Planning Division to ensure compatibility and safety of development throughout San Bruno. Building and construction permits, and approvals reviewed by the Building Division are also required after planning entitlement is obtained. Table 3-4 summarizes the types of permits required for housing projects and typical processing time. Although residential uses are principally permitted uses, most new construction projects require an Architectural Review Permit at a minimum- a process that requires public hearing and approval by the Architectural Review Committee, a sub-committee of the Planning Commission. If the project is located within the Transit Corridors Plan Area, then the Design Guidelines contained in Chapter Five, *Private Realm Development Standards and Design Guidelines*, are used to evaluate project design. Although good design suggestions are provided in these guidelines, often the guidelines are perceived in an objective manner, which has led to additional review meetings and redesigns by applicants. Having comprehensive objective design guidelines for projects would reduce the design dialogue and expedite the development review process for multi-family housing.

Depending on the conformity of a project application with the City's applicable regulatory standards such as the General Plan and the Zoning Ordinance, and the complexity of the development proposal, the time that is required from application submittal to project approval may vary considerably. Factors which can affect the length of development review on a proposed project include a rezoning or General Plan amendment requirement, public meetings required for community outreach, Architectural Review Committee, Planning Commission or City Council review, or a required CEQA clearance, such as a Negative Declaration or Environmental Impact Report (EIR).

For a typical single-family (infill) addition or rebuild project, required planning review ranges from two to three months and building permit review requires three weeks for the first review. A large single-family residential subdivision requires 12 to 18 months for planning review, depending on the type of CEQA clearance required. Large multi-family projects generally require three to four months for planning review and up to four months for building review, in addition to time for CEQA review and engineering review as shown in Table 3-5.

TABLE 3-4 HOUSING TYPES PERMITTED BY ZONING DISTRICT

Housing Types	ZONING DISTRICTS								
	R-1	R-2	R-3	R-4	C-B-D	TOD-S	TOD-1	TOD-2	MX-R
SF-Detached	P	P	P	P					
SF-Attached	P	P	P	P					
Duplex			P	P					
3+ DU				P	P	P	P	P	P
Residential Care Facilities	P	P	P	P	P	P	P	P	P
Mobile-Homes	CUP	CUP	CUP	CUP					
Manufactured Homes	P	P	P	P					
Accessory Dwelling Unit	P	P	P	P	P	P	P	P	P
Boardinghouse			CUP	CUP	CUP	CUP	CUP	CUP	CUP
Live/Work					CUP	P	P	P	P
Multi-Family Homes		CUP	P	P	P	P	P	P	P

Source: City of San Bruno Planning, Zoning Code.

TABLE 3-5 TIMELINES FOR PERMIT PROCEDURES IN SAN BRUNO

Type of Approval or Permit	Typical Processing Time	Approval Body
Site Plan Review	3 - 4 weeks	Planning staff
Architectural/Design Review (minor)	4 - 8 weeks	Planning Staff
Architectural/Design Review (major)	8 - 16 weeks	Architectural Review Committee
Conditional Use Permit	8 - 16 weeks	Planning Commission
Zone Change	12 - 24 weeks	City Council
General Plan Amendment	12 - 24 weeks	City Council
Subdivision Maps	12 - 24 weeks	City Council
Final Subdivision Maps	4 - 6 weeks	City Engineer/City Council
Parcel Maps	8 - 12 weeks	Planning Commission
Negative Declaration	7 - 12 months	Planning Commission
Environmental Impact Report	10 - 18 months	Planning Commission

Source: City of San Bruno, Planning Division.

The length of San Bruno's review process is comparable to other Bay Area cities, but improvements can be made to further expedite the review process. Table 3-6 below shows typical application combinations by type of residential project.

TABLE 3-6 TYPICAL SAN BRUNO PROCESSING PROCEDURES BY RESIDENTIAL PROJECT TYPE

Single-Family Unit	Subdivision	Multi-Family Units
Site Plan Review	Site Plan Review	Site Plan Review
Architectural Review	Design Review	Design Review
	Tentative Map	Initial Study
	Final Map	Negative Declaration / EIR
	Initial Study	
	Negative Declaration / EIR	
Approximately 12 weeks	8 months + CEQA processing time	6 months + CEQA processing time

Source: City of San Bruno, Planning Division.

One way in which the City has expedited the review and approval of affordable housing projects in the past is through the adoption of the US Navy Site Specific Plan. The Specific Plan prescribed specific requirements, such as environmental review, design guidelines, and parking. Individual projects built within the Specific Plan area are processed more expeditiously. However, Specific Plans take a considerable amount of time to develop because they are regulated by state law and are a legislative act of the local jurisdiction.

The Transit Corridor's Specific Plan (TCP) includes provisions to expedite certain projects within the TCP area. Specifically, mixed-use residential projects are permitted uses under the corresponding zoning, so projects can be approved with one hearing before the Planning Commission after completing the pre-application review process. In addition, an environmental clearance under CEQA is typically evaluated as an infill project or specific plan consistency exemption.

While the City's General Plan and Zoning Ordinance bring uniformity and fairness to the regulation of the community's housing stock, they do not adequately address many unique conditions that result from the city's historic development patterns and great diversity. Therefore, the City developed and implemented Residential Design Guidelines in 2010 to assist the staff, Planning Commission, and City Council when considering exterior design of single-family and two-family residences in the city that require discretionary approval or a building permit. The design guidelines are intended to assist homeowners and builders in designing their projects with sensitivity to their neighbors and to communicate the community's expectations regarding new residential construction. The guidelines address important planning and design issues that are not covered by the City's primary regulatory documents, including enhancing the identity of residential neighborhoods, assuring compatibility in scale of structures within residential neighborhoods, controlling development of hillside lots, and encouraging the construction of Green Buildings. The purpose of the design guidelines is not to be cost prohibitive but to streamline the design review process by more clearly communicating community expectations to property owners and builders. All new single-family and two-family homes and additions thereto are subject to review for consistency with the Residential Design Guidelines. Residential additions that only require a building permit are subject to staff level design review. Single-family and two-family projects that require a discretionary permit from the City are reviewed by the Architectural Review Committee prior to entitlement. There are no objective design guidelines for multi-family projects in the city. The TCP includes design guidelines, but they are not all objective in nature and subject to interpretation. Adopting objective design guidelines as part of the zoning code for large and small multi-family housing and mixed-use projects will improve and shorten the review process for these projects. Similar amendments can be made to the City's current Residential Design Guidelines to include objective design guidelines for missing middle housing.



DENSITY BONUS

In 2021, the City updated its Density Bonus regulations for compliance with California Government Code Section 65915. Since adoption, the City has received three development applications (840 San Bruno Avenue, 732 – 740 El Camino Real, and 170 San Bruno Ave.) proposing a total of 596 units that sought to utilize the City’s density bonus provisions. The City anticipates receiving more density bonus applications in the future because the City requires a 15% affordable housing requirement, the minimum affordability requirement needed to exercise density bonus provisions. One unique provision of the City’s density bonus ordinance is the requirement for a base density study for projects in zoning districts that have unlimited density standards. This study requires applicants to provide schematic plans for a code complying project which then establishes the base density for the development site. The study has been confusing for applicants and has taken some time to do correctly.

SB 330 PROJECT REVIEW

The City’s permitting process is consistent with Senate Bill 330, the Housing Crisis Act of 2019. Consistent with SB 330, applicants must request review pursuant to SB 330 by submitting an SB 330 preliminary application. If the submitted housing project complies with applicable General Plan and zoning standards, then it is subject only to the development standards and fees that were applicable at the time of submittal. This applies to all housing projects unless the project square footage or unit count changes by more than 20% after the preliminary application is submitted.

SB 35 PROJECT REVIEW

The City processes SB 35 applications consistent with Senate Bill 35. In 2021, the City successfully processed and approved its first and only SB 35 project to date. The project, located at 732 – 740 El Camino Real, included a density bonus request and entitled 136 residential units. The City learned a lot in processing the application and will continue to refine the review process as appropriate to streamline the approval process. Most notably, the City will need to establish comprehensive objective design standards for eligible projects, as set forth under California Government Code Section 65913.4.

12. DEVELOPMENT FEES AND EXACTIONS

Local government development fees affect the cost of new housing. San Bruno has established fees for building permits and planning services for all residential developments which have traditionally been far lower than neighboring jurisdictions. In 2021 the City Council adopted a “cost recovery” fee structure based on a comprehensive permit fee nexus study. As shown in Table 3-10, entitlement review and building permit fees total approximately \$58,209 for a single-family home, \$72,148 for a multi-family unit in a small apartment complex, and \$39,412 for a unit in a large apartment complex. These costs are estimates of potential building and planning fees, and do not include environmental review costs or the costs of providing new, or upgrading existing, infrastructure. Planning related fees are listed in Tables 3-7, 3-8, and 3-9. Though the fees are reasonable, they increase the development cost of residential units. The City’s fees are a small portion of overall housing development costs. They are commensurate with nearby jurisdictions and therefore do not pose a unique constraint to development.

13. OFF-SITE IMPROVEMENTS

All development in San Bruno is urban infill development on sites that are currently occupied or have been previously occupied by prior uses. Therefore, off-site improvements to serve the project are generally limited to project frontage sidewalk, curb improvements, landscape, utility infrastructure improvements to provide service to

development, and in some cases project intersection improvements to address public health and safety impacts of the project pedestrian, bicycle, automobile, and/or truck traffic.

For residential subdivisions, applicants are required to provide new public streets, sidewalks, and lighting up to city standards to be maintained by the project. Although new streets are private, they are required to grant public access easements and be maintained by the project. Several developers have proposed private rights-of-way that are narrower than city standards, with sidewalks only on one side of the street. These proposals have been approved by the City provided that adequate access is provided for fire safety. It does not appear that the off-site right-of-way improvements required for residential subdivisions are a constraint to housing development because of the flexibility provided.

San Bruno has aging water and wastewater infrastructure that needs replacement, which is most notable in the neighborhoods east of El Camino Real. The City's CIP has focused on repairing the water and wastewater infrastructure in these neighborhoods but there is much more work to be done. All of the Housing Element housing opportunity sites are already served by utilities with existing infrastructure in place, but the infrastructure doesn't always have the capacity for new multi-family development. To ensure water and wastewater infrastructure can accommodate the needs of a specific project, the City requires that project applications for new development be reviewed for adequate infrastructure. Utility improvements are evaluated at the project level to ensure the infrastructure exists to service new developments. Needed off-site water and wastewater infrastructure improvements are often a major constraint for new development, requiring tens of thousands of dollars in infrastructure upgrades. The location of the City's capital improvements doesn't always match the project where it is immediately needed. A program has been added to improve staff coordination to assist in prioritizing water and wastewater infrastructure improvements where it benefits residential development the most.

BUILDING PERMIT REVIEW

The City of San Bruno has adopted and administers the California Building Standards Code. The City's building permit review process ensures project compliance with State of California plumbing, electrical, mechanical, building, and other building code requirements. For large residential subdivisions, the construction permit plan check usually involves the review on the model homes for each discrete floor plan. This review process is typically completed in less than five weeks. The amount of time between the completion of the review and the issuance of a Building Permit is determined by the speed at which the applicant is able to make any necessary corrections to the Construction Drawings and resubmit for approval.

AFFORDABLE HOUSING PROGRAM AND IN-LIEU FEE

San Bruno's Affordable Housing Program, which was amended in March 2021, requires new residential developments of five or more units to provide a minimum of 15% of total units at below market rates to very low-, low-, and moderate-income households. For ownership housing, 10% of units must be affordable to moderate-income households and 5% of the units must be affordable to low-income households. For rental housing, 5% of the units must be affordable to very low-income households, 5% of the units must be affordable to low-income households, and 5% of the units must be affordable to moderate-income households. The Ordinance requires that affordable units are comparable in number of bedrooms, exterior appearance, and overall quality of construction to market rate units in the same project. Affordable units must be provided on-site unless an alternative is approved by Council, which includes an affordable housing impact fee. All affordable housing units are deed restricted for 55 years for rental units and 45 years for for-sale units. Council has made it clear they would prefer all affordable housing units to be provided on-site, therefore, all residential projects, regardless of density, will be required to accommodate a portion of the City's lower income RHNA.



The ordinance requires construction of the affordable units; however, the City Council may approve payment of an affordable housing in-lieu fee. All of the City’s pipeline housing projects include on-site below market-rate units. In addition, the City adopted commercial linkage fees in 2019 for all nonresidential development projects. All in-lieu fees and linkage fees are adjusted annually and are contributed to the City’s Below Market Rate Housing Trust Fund. To date, developers have paid fees totaling approximately \$3.9 million instead of building the required affordable units.

There has been extensive debate over the question of who bears the cost of an inclusionary requirement. Depending on the relative strength of the housing market, the costs may be incurred by:

- Landowners, who may receive a lower price for their land if developers are expecting a lower profit margin from the inclusionary requirement;
- Developers, who may have to accept lower profits if housing prices cannot be raised; or
- Purchasers of market-rate units, who may have to pay higher housing prices if the local and regional housing supply is limited and prices are at least as high in areas outside the city.

The fact that landowners, developers, and/or purchasers of market-rate units may incur a portion of the cost of providing affordable units may be construed as a constraint to the overall development of housing in San Bruno. However, the ordinance offers flexibility that could lessen the economic impact of providing affordable units. The City Council may approve alternatives to the construction of new inclusionary units where the proposed alternative supports specific housing element policies and goals and assists the City in meeting its state housing requirements. Alternatives may include, but are not limited to:

- Construction of affordable units off-site;
- Acquisition and rehabilitation of affordable units;
- Conversion of existing market units to affordable units;
- Dedication of land to the City suitable for the construction of affordable units; and
- Construction of affordable second dwelling units.

TABLE 3-7 AFFORDABLE HOUSING LINKAGE FEE

Unit Type	Fee (per sq ft)
Single-Family	\$35.10
Condominium (per sq ft)	\$32.50
Apartment (per sq ft)	\$32.50
Office (per sq ft)	\$16.25
Retail (per sq ft)	\$8.12
Hotel (per sq ft)	\$16.25

Source: City of San Bruno, Master Fee Schedule, 2022

IMPACTS ON TIMING, COST, AND SUPPLY OF HOUSING OF AFFORDABLE HOUSING PROGRAM

During the development of the affordable housing linkage fee, San Bruno retained an economic consultant to calculate reasonable in-lieu fees for new residential rental and ownership developments. This analysis included an assessment of impacts of the proposed in-lieu fees on the feasibility of residential projects and compared the parameters of San Bruno’s Affordable Housing Program to inclusionary requirements in neighboring jurisdictions. The analysis concluded that while San Bruno’s ordinance would make development projects in the city somewhat less profitable than the status quo, the requirements would be within the range of practices in neighboring jurisdictions. In practice, the Affordable Housing Program is a reliable mechanism for creating affordable housing units. The City has been able to negotiate more affordable housing units (greater than 15%) and more units at the low or very low-income categories for some projects as a community benefit when a housing entitlement is accompanied by an unusual request (e.g., Mills Park, Glenview Terrace, 111 San Bruno Avenue).

Since this ordinance has been in place, most multi-family residential projects submitted to the City have included a density bonus request which adds units to the project (often more affordable units) which serves to make projects economically viable.

FEES FOR PROJECT ENTITLEMENT APPLICATIONS

The development fees for projects requiring entitlement applications, as contained in Table 3-8, are not a constraint to housing development. Residential uses are permitted by the General Plan on all the city's identified housing opportunity sites, except for the Tanforan mall site. Most of the opportunity sites identified in this Housing Element would not require higher application fees associated with a General Plan or Zoning Ordinance amendment or from Planned Development permits.

TABLE 3-8 OTHER DEVELOPMENT FEES, PROJECTS REQUIRING ENTITLEMENT APPLICATION (2022)

	Application Fee (\$)
Architectural Review – Single Family Residential	\$2,594
Architectural Review - Multi-Family Residential	Deposit*
Use Permit – Single Family Residential	\$2,992
Pre-Application Consultation Review	Deposit*
Transit Corridors Plan Pre-Application Review	Deposit*
Use Permit – Multi-Family Residential	Deposit*
Development Agreement	Deposit*
General Plan Amendment	Deposit*
Minor Modification	\$1,287.50
Parking Compliance	Deposit*
Planned Development Permit	Deposit*
Planned Unit Permit	Deposit*
Variance – Single Family Residential	\$3,175
Variance – Multi-Family Residential	Deposit*
Zoning Amendment	Deposit*
SB 330 Application	Deposit*
SB 35 Application	Deposit*
Density Bonus Application	Deposit*
Mitigated Negative Declaration	Deposit*
Environmental Impact Report	Deposit*
Expanded Categorical Exemption	Deposit*

* This type of application requires a deposit whereby the applicant is responsible for the actual cost of staff and consultant time.
Source: City of San Bruno Community and Economic Development Department, 2022.

Typical deposits range from \$8,000 to \$75,000 with the exact amount set by staff based on review of similar housing projects in the past. The typical deposit for a multi-family TOD project would be closer to the \$75,000 threshold and would cover environmental review and engineering studies in addition to the typical staff review. All entitlement fees are listed on the City's website in the Master Fee Schedule.



A typical new single-family house would require a public meeting for Use Permit review (\$2,992) for development on an infill lot. This process includes a separate public meeting by the Architectural Review Committee for design review for no additional fee. Additional application fees would be required if the project is seeking a relief from development standard(s). A categorical exemption would be issued to address CEQA. The applicant can apply for a building permit once the entitlement is secured. The City's development impact fees (\$29,454.53) are due prior to building permit issuance. The balance of fees (\$25,762.47) are attributable building permit fees, school fees, and utility connection fees. The entitlement review fees are substantially more for multi-family projects, but the cost is spread out over a larger number of units. Larger multi-family projects generally require pre-application review (\$15,000 deposit). Once the pre-application process has been completed, multi-family projects generally require Architectural Review (\$50,000 deposit), which covers the cost for environmental review and engineering studies, and all staff review. The amount of deposit would increase with the level of project complexity. All deposits are established to cover actual staff and consultant time spent reviewing the project. Leftover deposit funds are returned to the applicant.

DEVELOPMENT IMPACT FEES

In 2019, the City prepared a nexus study and adopted a citywide Development Impact Fee (DIF) ordinance. The purpose of the ordinance is to impose fees upon development projects that fully or partially offset the costs of public facilities that are needed to serve demand created by that development project. The amount of fees does not include the costs attributable to demand generated by existing development. The DIF represents a fair share contribution to a specific list of public infrastructure improvements, park improvements, public safety facility improvements, transportation, and general government necessary to support projected growth in the city. Fee payment is due at building permit issuance for all development. Table 3-9 lists the citywide Development Fee structure which can also be found on the city's website in the Master Fee Schedule.

TABLE 3-9 DEVELOPMENT IMPACT FEES FY2022 - 2023

Land Use	Community	Public Safety	General Government	Transportation	Utilities	Total
Single-Family (per unit)	\$19,128.33	\$1,420.38	\$2,010.06	\$4,183.92	\$2,751.84	\$29,454.53
Multi Family (per unit)	\$17,957.16	\$1,419.21	\$1,886.04	\$3,237.39	\$2,583.36	\$27,083.16

Source: City of San Bruno, Master Fee Schedule, 2022.

COMPARISON TO OTHER SAN MATEO COUNTY JURISDICTIONS

According to the survey conducted by San Mateo County through its 21 Elements process, total fees for single-family housing vary significantly by jurisdiction from \$15,941 to \$104,241 (see Table 3-10). Total fees for small and large multi-family housing developments also vary between jurisdictions. In this context, San Bruno's fees associated with multi-family residential development are within the range of jurisdictions in the county and thus would not be considered a barrier to housing development.

TABLE 3-10 SAN MATEO COUNTY JURISDICTIONS TOTAL FEES (2022)

	Single-Family	Small Multi-Unit	Large Multi-Unit
Atherton	\$15,941	No Data	No Data
Brisbane	\$24,940	\$11,678	No Data
Burlingame	\$69,425	\$30,345	\$23,229
Colma	\$6,760	\$167,210*	\$16,795
Daly City	\$24,202	\$32,558	\$12,271
East Palo Alto	\$104,241	No Data	\$28,699
Foster City	\$67,886	\$47,179	\$11,288
Half Moon Bay	\$52,569	\$16,974	No Data
Hillsborough	\$71,092	No Data	No Data
Millbrae	\$97,756	\$6,824	\$55,186
Pacifica	\$33,725	\$40,151	No Data
Portola Valley	\$52,923	No Data	No Data
Redwood City	\$20,795	\$18,537	\$62,696
San Bruno	\$58,209	\$72,148	\$39,412
San Mateo	\$99,003	\$133,658	\$44,907
South San Francisco	\$81,366	\$76,156	\$32,471
Unincorporated San Mateo	\$36,429	\$27,978	\$10,012
Woodside	\$70,957	\$82,764	No Data

*Source: Fees survey conducted by 21 Elements (2022).

14. PERMITTING TIMES

San Bruno entitled many more residential projects in the last planning cycle than received building permits. Despite approvals issued by the city, in some cases years ago, projects in the TCP have not taken shape. The only project built in the specific plan area is the 83 multi-family units at 406 – 418 San Mateo Ave. Some of the reasons projects have failed to move forward is based on circumstances outside the city’s control. But it is unclear why other projects have failed to move forward. Anecdotally, projects that have been submitted by experienced developers have tended to move forward with building permit submittal and through to project completion. A number of projects by smaller developers have been put up for sale after entitlement. The City might benefit from having a more in-depth conversation with developers to gain a better understanding of the roadblocks that prevent them from proceeding with their project after entitlement. A program has been added for the City to start this outreach.

15. INFRASTRUCTURE

THE NETWORK

As a built-out community, San Bruno’s infrastructure network has been extended to virtually every corner of the city. All the housing opportunity sites proposed in this Housing Element are on existing developed property connected or adjacent to all city services. Redevelopment of these infill sites may require infrastructure improvements by the City or the developer to upgrade aging infrastructure or to increase capacity. Developers are required to upgrade infrastructure to service their projects. The provision of on-site improvements, such as streets, curbs, gutters, sidewalks, landscaping, utility undergrounding, drainage, water, and sewer infrastructure, are standard conditions of development approval and have not been barriers to affordable housing development in the past. If off-site infrastructure improvements are required, these are the responsibility of the developer if the upgrade is not currently



in the Capital Improvement Program. Infrastructure costs are not incorporated into the total residential development project costs discussed under Market Constraints below.

WATER SUPPLY

Water supplied through the city's water system is a combination of purchased water and groundwater pumped from the city's groundwater supply wells. The City purchases its treated surface water from San Francisco Public Utilities Commission (SFPUC) and North Coast County Water District (NCCWD). According to the San Bruno Urban Water Management Plan (UWMP) (2021), the city receives water from two major supply sources: wholesale surface water from the San Francisco Public Utilities Commission (SFPUC) Regional Water System and local groundwater from the Westside Basin. San Bruno has historically used SFPUC regional water supplies to meet demands that could not otherwise be met through local groundwater production.

The city's Public Works Department (Water Division) owns, operates, and maintains the potable water distribution system that serves drinking water to users within its water service area. The City currently (2020) serves a population of approximately 45,300 and anticipates population growth and future planned development in its water service area. Future service area population is based on projections provided in the Association of Bay Area Governments (ABAG) Plan Bay Area 2040. The city's 2045 population is projected to be approximately 56,800.

Identified developments are projected to increase water demand by approximately 1.1 million gallons per day (mgd). Most demand from identified developments are in the Transit Corridors Plan area (0.42 mgd) and the Bayhill Specific Plan area (0.52 mgd). Also included in the projected buildout demand is an additional 0.55 mgd of water demand from unidentified future development to account for additional growth that could potentially occur by 2040 (e.g., ADUs and additional units created by density bonuses). Therefore, an additional 0.55 mgd of future demands was allocated to Zone 1 to 4 to accommodate future development in the TCP. Table 3-11 shows that the total projected city water demand at buildout of 4.78 mgd. This is consistent with the 2040 demand projection presented in the city's 2020 UWMP. As such, water supply is not expected to be a constraint to future housing development.

TABLE 3-11 SAN BRUNO WATER DEMAND COMPARISON

Urban Water Management Plan (2021)

UWMP 2021 Population Estimate	45,257
UWMP 2021 Total Water Demand Estimate (mgd)	4.23
UWMP 2021 Total Water Demand Estimate (mgd) at 2040 Buildout	4.78
UWMP 2021 Avg. Residential Consumption per Capita	2.22

Source: City of San Bruno Urban Water Master Plan (December 2021).

WASTEWATER TREATMENT

The sanitary sewer system consists of approximately 150 miles of pipeline and seven lift stations. Currently, 2.8 mgd of effluent goes to the South San Francisco-San Bruno Water Quality Control Plant (SSF/SB WQCP) treatment plant that the City of San Bruno owns jointly with the City of South San Francisco. The treatment plant is nearly 50 years old but has been updated several times to provide primary and secondary treatment. Its most recent upgrade project was completed in 2001. The facility expansion allows a dry-weather capacity of 13 mgd and a wet-weather capacity of approximately 62 mgd. San Bruno is entitled to 0.5 mgd of the additional 4.0 mgd capacity, and currently utilizes about 30% of the plant's total capacity. There is no formal agreement as to the proportion of water treatment capacity entitled to each city.

Most of San Bruno's sewer collection system was installed 30 to 80 years ago, its age reflecting the decades of the city's most rapid growth. It contains large sections of aging pipe that will require upgrading and/or replacement. The gravity-flow lines were constructed primarily with vitrified clay pipe, a material that tends to crack with age. Small sections of Orangeburg (an inferior substitute cardboard-based material used during wartime) pipe installed during the 1940s still exist.

Buildout of the General Plan would result in an increase of approximately 105,400 gpd of wastewater created. Together with existing and pending flows, the city's 2025 flows are projected at 3.1 mgd of wastewater, which is still only a third of plant dry season capacity. Wastewater treatment is therefore not expected to be a constraint to housing development during this RHNA cycle.

PRIORITY FOR WATER AND SEWER

Per Chapter 727, Statutes of 2004 (SB 1087), upon completion of an amended or adopted Housing Element, a local government is responsible for immediately distributing a copy of the element to area water and sewer providers. In addition, water and sewer providers must grant priority for service allocations to proposed developments that include housing units affordable to lower-income households. Chapter 727 was enacted to improve the effectiveness of the law in facilitating housing development for lower-income families and workers.

To comply with SB 1087, upon adoption, this Housing Element will be forwarded to the city's Public Works Department – Water Division, so it can grant priority for service allocations to proposed developments that include units affordable to lower income households.

DRY UTILITIES

Dry utilities, including electricity and telephone service, are available to all areas within the city. Pacific Gas and Electric (PG&E) provides gas and electrical service to the city and can provide this service to the anticipated housing units. The City provides its own cable and internet service to most neighborhoods. Those areas not served by city cable and internet are serviced by AT&T.

SOLID WASTE DISPOSAL

San Bruno has been diverting at least 50% of solid waste from landfill since 2000. Materials that are not recycled are transported to the 173-acre Ox Mountain facility, a Class III (non-hazardous) facility managed by San Mateo County and serving other jurisdictions as well. The county anticipates the landfill to reach capacity in 2034. San Bruno does not anticipate RHNA housing development to be constrained by solid waste disposal capacity.

16. BUILDING CODE AND ENFORCEMENT

The City has adopted the most current California Building, Building Conservation, Mechanical, Plumbing, Electrical, and Fire codes and the California Energy Efficiency Standards as the basis of its building standards. The City has also adopted the Uniform Code for the Abatement of Dangerous Buildings. Permits are required for all electrical and plumbing work and other major home improvements and modifications. San Bruno has several requirements in addition to the standard California Codes. These include:

- Complete removal of old roof materials required before replacement.
- Minimum roof quality required is Class B.
- Addition of sprinklers required in the rehabilitation of any building over 7,500 square feet.



- Noise insulation required for residential structures within the 65 dB community noise equivalent level (CNEL) or greater (necessary to meet Federal Aviation Administration standards).

In general, the city's building codes represent basic construction standards within the State of California and thus do not place an undue burden on the construction or rehabilitation of affordable housing. The one exception to this may be the noise insulation requirement. However, noise insulation is federally required in areas where noise levels meet or exceed 65 dB CNEL.

It may be costly to rehabilitate or remodel older buildings that were constructed under less stringent building codes. San Mateo County offers a loan program enabling owners of such buildings to achieve contemporary building standards, yet still maintain affordability.

The City will be considering the adoption of reach codes and an EV charging station ordinance in late 2022 that will likely include requirements for all electric construction for new residential projects.

17. HOMEOWNERSHIP FINANCING

Home ownership can be constrained by mortgage interest rates, loans, and homeowners' insurance. Interest rates are determined by national policies and economic conditions. The Federal government has raised interest rates sharply since Q2/2022 in an effort to curb inflation. As a result, mortgage interest rates in the San Francisco Bay Area are averaging 7.24% for a 30-year fixed loan, 6.43% for a 15-year fixed loan, and 6.63% for a 5-year ARM according to Realtor.com. By contrast, in August 2021, mortgage interest rates for new home purchases were approximately 2.875% for a fixed-rate 30-year loan (wellsfargo.com). The sharp rise in mortgage interest rates has led to more households being priced out of the housing market. First-time homebuyers and households of color are the groups most impacted by increased mortgage rates. High housing prices and rising mortgage rates has made homeownership unaffordable for lower-, moderate-, and many above moderate-income households in San Bruno who generally experience more difficulty saving enough money for the down payment required to buy a home. As more households get priced out of the homeownership market, more pressure will be placed on the rental market and some households will choose to leave the region altogether in search of more affordable housing options.

18. BUILDING AFFORDABLE HOUSING

Building affordable housing is just as costly as building market-rate housing in California, if not more expensive in some cases. LIHTC data show that altogether, these cost drivers led the total development costs for affordable housing to reach \$480,000/unit and \$700/square foot across California in 2019. Affordable housing projects are subject to the same trends and volatility in construction costs, which often account for more than 60% of a project's costs. Rising costs have been particularly pronounced in the Bay Area, where the average total development cost was closer to \$600,000/unit as of 2020. A recent article in the San Francisco Chronicle estimated it cost almost \$1.2 million per unit on the high end to build an affordable unit in San Francisco. In the 10-year period between 2008 and 2018, hard costs increased 119% in the Bay Area compared to 25% statewide when accounting for inflation. Materials and labor are two of the primary drivers of these increases due to shortages in both markets. Material costs—particularly in wood, insulation, roofing, and appliances—have escalated in recent years due to COVID-19, climate change, global trade patterns and federal macroeconomic policy decisions. The labor market in the Bay Area has also tightened, as the high cost of living has led some to relocate outside the Bay Area, resulting in increased transportation costs, a general shortage of labor, fewer specialists in the multi-family sector, and substantially higher wages overall.

Beyond construction costs, local development fees, long entitlement processes, parking requirements, and heightened design scrutiny can contribute to inflated hard and soft costs. State and local regulations and requirements may aim to achieve important policy goals, but also load up projects with considerable costs. For example, 60% of LIHTC projects between 2008 and 2019 were subject to prevailing wage requirements, which led to projects that were 10%

and 35% more expensive than non-prevailing wage projects, depending on location. Moreover, while “deep affordability” in income targeting (targeting extremely low- and very low-income households) has become more of a public policy priority, the fact is that costs of new construction do not change under this scenario, requiring an even greater subsidy from public sources to offset the financing gap created by the lower rents. With less income available to a project and escalating development costs, the puzzle of securing project financing becomes increasingly challenging.

19. FORMER REDEVELOPMENT AGENCY

The enactment of ABx1 26 dissolved all redevelopment agencies in California on February 1, 2012 and created successor agencies to wind down their operations. Low- and Moderate-Income Housing (LMIH) tax increment generated from the San Bruno Redevelopment Project Area was the city’s main source of funding for affordable housing. San Bruno had one Redevelopment Project Area, which was established in July 1999. During its 13 years of operation, the Redevelopment Agency facilitated the development of 97 units of affordable to very low-income households. The City monitors new state legislation that may restore some state funding for affordable housing but does not have dedicated staff to carry out the mission of the former Redevelopment Agency.

B. FUNDING SOURCES FOR AFFORDABLE HOUSING

Affordable housing projects usually require multiple subsidy sources to close the funding gap between the cost to develop and the size of the mortgage based on affordable rents. As a result, the process of assembling financing for affordable housing development is lengthy, challenging and expensive, involving multiple competitive applications (and their respective deadlines) and negotiations with lenders, investors, and other funding partners. Affordable housing projects typically take 4-6 years to complete, from the initial identification of a site, partner or funding opportunity, through the process to assemble funding, get local approvals, work with the community, design and construct the building, to leasing the building to residents.

1. FEDERAL, STATE, LOCAL, AND REGIONAL RESOURCES FOR AFFORDABLE HOUSING

This section describes several federal, state, and local housing programs that provide funding for predevelopment, acquisition, construction, rehabilitation, conversion and preservation. Also included is funding that provides financial assistance to very-low, low and moderate-income households for monthly housing costs, home rehabilitation, and down payment assistance.

FEDERAL PROGRAMS

The U.S. Department of Housing manages and disburses federal resources like 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. CDBG and HOME funds are invested in a wide spectrum of housing and community development activities, including the creation of affordable housing units. ESG funds are used solely to support the operations of homeless facilities, rapid rehousing services, and ancillary services.

On March 27, 2020, the Coronavirus Aid, Relief, and Economic Security (CARES) Act, Public Law 116-136, was signed into law and provided supplemental funding to states and local governments through Community Development Block Grants Coronavirus (CDBG-CV), Emergency Solutions Grants Coronavirus (ESG-CV), and other funding programs. In 2021, the Federal American Rescue Plan (ARP) appropriated \$5 billion to help communities provide housing, shelter, and services for people experiencing homelessness and other qualifying populations. HUD’s HOME Investment Partnerships Program – American Rescue Plan (HOME-ARP) funding



gave jurisdictions like San Mateo County significant new resources to address homeless assistance needs by creating affordable housing or non-congregate shelter units and providing tenant-based rental assistance or supportive services.

While the County is a pass-through agency that administers the above listed resources, some federal funds are accessed directly by developers for specific projects such as the HUD 202, HUD 811, the Federal Home Loan Bank Affordable Housing Program, and the Federal Low-Income Tax Credit program.

- **Tax Credit Equity:** The biggest affordable housing program in the country is run by the federal Internal Revenue Service (IRS), which offers a credit against federal income taxes in exchange for investments in affordable housing. States, including California, also offer a state housing tax credit. Corporations or banks with federal tax liability put upfront cash into a project in return for 10 years of credits against their taxes. This program can fund about 30-70% of a project's development costs. In California the California Tax Credit Allocation Committee (CTCAC) is responsible for allocating federal and state tax credits to projects.
- **Tax-Exempt Bonds:** Affordable housing projects can be financed in part by the issuance of tax-exempt bonds, which provide funds in the form of a loan to the project, resulting in less expensive debt and larger loans for projects. A local government agency usually acts as the bond issuer. In California, the California Debt Limit Allocation Committee (CDLAC) is responsible for granting the ability to issue these bonds.
- **Loans and Grants from the Federal Government:** The US Department of Housing and Urban Development (HUD) provides block grants (HOME, CDBG and others) that are distributed to states, counties and cities to support affordable housing and community development. HUD was once the primary funder for the development and subsequent redevelopment of public housing. However, in recent years, HUD funds have generally only been a minor source of funding for affordable housing.

Federal Programs include:

- **Community Development Block Grant (CDBG):** HUD awards CDBG grants to jurisdictions through a statutory formula based on estimated need. CDBG funds can be used to assist extremely low- to moderate-income persons through housing acquisition, rehabilitation of housing, provision of housing and public services, improvement of community facilities, economic development, neighborhood revitalization, and similar activities. In San Mateo County, CDBG funds are split between community development and housing development programs. The County's CDBG funding has slightly decreased or plateaued over the last five years, and it is anticipated that the CDBG grant will remain at the current level or decrease further. Given the limited amount of CDBG and other HUD funding received by the County, the County currently targets these funds primarily to very low- and extremely low-income and special needs households.
- **HOME:** The HOME Program is a federal grant to participating jurisdictions from which funds are directed to housing programs assisting persons earning 60% of median income or less. HOME Program funds can be used for housing rehabilitation, new construction, and acquisition and rehabilitation of both single family and multi-family housing projects.
- **Section 8 Rental Assistance Program:** The Section 8 Rental Assistance Program, also known as the Housing Choice Voucher Program (HCV) is administered by the Housing Authority of the County of San Mateo (HACSM) and is targeted to very low-income individuals and families, including seniors, formerly homeless, and persons with disabilities. Funded by HUD, the HCV Program is the major program for assisting eligible low-income families to rent decent, safe, and sanitary privately-owned housing. Under the HCV program, eligible families may rent private market units from willing owners whose units meet Housing Quality Standards (HQS) set by HUD. After a contract is executed between the owner and the Housing Authority, the family pays its portion of the rent to the owner. The tenant rent is based on the family's income, generally 30% to 40% of its monthly adjusted income. The balance of the rent is paid to the owner by HACSM. The HCV program delivers many benefits to the County of San Mateo. First and foremost, it enhances the quality of life for families who

may otherwise find it difficult to live in one of the highest rent areas in the nation. It plays a critical role in expanding the supply of affordable housing in all San Mateo County neighborhoods.

PROGRAM ADVANTAGES

- **On-Time Payments.** The Housing Choices Voucher Program offers real estate investors guarantees and safeguards unmatched by the private sector rental market. The government pays on-time, every time. It arrives in the mail the first of the month every month. This alone may outweigh all negatives from the perspective of a landlord.
- **Longer Contracts.** The program lease agreements are typically 1-year and sometimes 2-year contracts. Although the tenant can attempt to break the lease and move, tenants must first locate the new property and go through the entire approval process again. The general rule is that if the investor keeps up the property, tenants tend to stay the length of the contract and often will renew to avoid having to go through placement again.
- **Tenants.** Most tenants must meet certain requirements to qualify for vouchers and could lose their voucher if they breach their obligations as a tenant.

PROGRAM DISADVANTAGES

- **Difficulty of Move-In:** There is a lengthy process of paperwork and inspections before a tenant can move in and use the program.
- **Wear and Tear:** Most program tenants have large families and limited work, which means they are at home more often than a working family with fewer children. As a result, the property experiences more wear and tear.
- **Project-based Section 8:** Housing authorities can allocate Section 8 or Housing Choice Vouchers to projects, rather than to individual households. This can be an important source of stable rental revenue for affordable housing developments. Furthermore, these projects can borrow against that anticipated income, increasing the amount of upfront capital available during the development process.
- **Low Income Housing Tax Credits (LIHTC):** The Low-Income Housing Tax Credit (LIHTC) program is the most important resource for creating affordable housing in the United States today. Created by the Tax Reform Act of 1986, the LIHTC program gives [State and local LIHTC-allocating agencies](#) the equivalent of approximately \$8 billion in annual budget authority to issue tax credits for the acquisition, rehabilitation, or new construction of rental housing targeted to lower-income households.

The federal government issues tax credits to state and territorial governments. State housing agencies then award the credits to private developers of affordable rental housing projects through a competitive process. Developers generally sell the credits to private investors to obtain funding. Once the housing project is placed in service (essentially, made available to tenants), investors can claim the LIHTC over a 10-year period.

STATE PROGRAMS

The State of California has been a longtime major funder of affordable housing through the Multi-Family Housing Program (MHP), which is primarily supported by periodic statewide housing bonds. In recent years, several other major state programs have been key funding sources for transit-oriented development, infill development, housing for veterans, housing for people experiencing or at risk of homelessness, housing for people with mental health challenges, and other groups of people with special needs. These programs, primarily administered by HCD, have been a critical source of gap financing, as the loans are of significant size, but they can only fund a limited number of projects and are often very competitive. State Programs include:

- **Multi-family Housing Program (MHP):** This State HCD program assists the new construction, rehabilitation and preservation of affordable rental housing for lower income households. MHP funds are currently available

through the Multi-family Finance Super NOFA released in March 2022. However, as these funds are authorized from the Veterans and Affordable Housing Bond Act of 2018 (Proposition 1), they will most likely be fully exhausted with this next round of NOFA funds. It is unknown if future funds will continue to be available through this program beyond 2022.

- **Infill Infrastructure Grant Program (IIG):** This State HCD program provides funds for capital improvement projects that are an integral part of, or necessary to facilitate the development of an affordable residential/mixed-use infill development. Infill projects can include new construction, acquisition, and substantial rehabilitation of an affordable resident development. IIG funds are currently available through the Multi-family Finance Super NOFA released in March 2022.
- **Veterans Housing and Homelessness Preventions Program (VHHP):** This State program assists the acquisition, construction, rehabilitation, and preservation of affordable multi-family housing for veterans and their families to allow veterans to access and maintain housing stability. VHHP funds are currently available through the Multi-family Finance Super NOFA released in March 2022.
- **Joe Serna, Jr. Farmworker Housing Grant (FWHG) Program:** This State program finances the new construction, rehabilitation, and acquisition of owner-occupied and rental units for agricultural workers, with a priority for lower-income households. FWHG funding for rental units is currently available through a NOFA released in March 2022 and FWHG funding for owner-occupied units will be available through a NOFA released in late 2022.
- **Affordable Housing and Sustainable Communities Program (AHSC):** This State program makes grants and affordable housing loans available for projects that reduce greenhouse gas emissions through ongoing cap and trade revenues. AHSC encourages compact, infill development with active transportation and transit use. Affordable housing developments that qualify may be new construction or acquisition/substantial rehabilitation projects, including preservation of affordable housing at-risk of conversion. The State anticipates releasing a NOFA in late 2022.
- **State Low Income Housing Tax Credits (State LIHTC):** State tax credits allow federal 4% tax credits to stretch further, resulting in more homes affordable to lower-income households, including people experiencing homelessness. Currently, affordable housing projects are eligible for state tax credits if they are in designated areas (Qualified Census Tract or Difficult Development Areas) and qualify for a Special Needs housing type.
- **Tax-Exempt Bond Financing:** Many affordable developments also use tax-exempt bond financing provided by the state (CalHFA), as well as other public agencies such as cities and counties. These entities originate loans with attractive interest rates compared to conventional financing. Federal law allows state and local governments to issue a defined amount of tax-exempt “private activity” bonds each year in order to facilitate private development, including the development of affordable housing. The California Debt Limit Allocation Committee (CDLAC) within the State Treasurer’s Office allocates this private activity bond authority in California. The primary beneficiary is affordable rental housing. Tax-exempt bonds lower the interest rate that developers pay on their mortgages. Projects that receive tax-exempt bond funds also automatically receive federal 4% low-income housing tax credits. Due to the oversubscription of tax-exempt bond financing, the bonds are now administered by CDLAC via a competitive application process.
- **California Housing Accelerator Program (CHAP):** In 2021, a \$1.75 billion investment was made to provide bridge funding to shovel-ready projects that were otherwise unable to begin construction because of a shortage of federal tax credits and bonds. The State awarded half of the funding through its first round and released a second round of funds in March 2022. It is unknown if future funds will continue to be available through this program beyond 2022 without additional resources approved for the program.
- **CalHFA:** Established in 1975, CalHFA is an independent California state agency within the California Department of Housing and Community Development that makes low-rate housing loans through the sale of taxable and tax exempt bonds. CalHFA provides housing assistance in two main areas: below-market interest

rate mortgages and down payment assistance for low- and moderate-income, first-time homebuyers, many of whom are ethnic minorities not well-served by market rate products and loans for the development and preservation of affordable multi-family rental housing.

LOCAL PROGRAMS

- **Permanent Local Housing Allocation (PLHA):** In September 2017, the California Legislature approved Senate Bill 2 (SB 2), known as the Building Homes and Jobs Act (Act), which established a \$75 recording fee on real estate documents to increase the supply of affordable housing. The Act establishes the Permanent Local Housing Allocation (PLHA) program administered by the California Department of Housing and Community Development (HCD). The PLHA provides a permanent source of funding to cities and counties to help meet the unmet need for affordable housing and increase the supply of affordable housing units.

Pursuant to PLHA funding requirements, jurisdictions seeking funds must submit a PLHA plan outlining how the jurisdiction intends to use the funds on eligible activities over the course of five years, how the local government will prioritize investments that increase the supply of housing for households with incomes at or below 60% of AMI, and how the plan relates to the local jurisdiction's Housing Element. The plan is meant to guide the City and County in developing collaborative projects to achieve our housing goals.

- **CALHome:** Provides grants to local public agencies and nonprofit developers to assist individual first-time homebuyers through deferred-payment loans for down payment assistance, home rehabilitation, including manufactured homes not on permanent foundations, acquisition and rehabilitation, homebuyer counseling, self-help mortgage assistance, or technical assistance for self-help homeownership. All funds to individual homeowners will be in the form of loans. Direct, forgivable loans are provided to assist development projects involving multiple ownership units, including single-family subdivisions, loans for real property acquisition, site development, predevelopment, construction period expenses of homeownership development projects, or permanent financing for mutual housing and cooperative developments. Project loans to developers may be forgiven as the loans convert into deferred payment loans to individual homeowners. Assistance to individual households will be in the form of deferred-payment loans payable on sale or transfer of the homes, when they cease to be owner occupied, or at maturity.
- **Loans and Grants from Regional Government:** Until now, MTC and ABAG have had a somewhat limited role in funding affordable housing. The Transit-Oriented Affordable Housing Fund (TOAH) was one exception. However, in 2019, state legislation created the Bay Area Housing Finance Authority (BAHFA), which intends to put a revenue measure on the ballot to fund affordable housing across the Bay Area. The COVID-19 pandemic led to the decision to delay a planned November 2020 ballot measure.
- **Loans and Grants from Local Government:** Local government also provides important gap funding to affordable housing. Sources include housing bonds issued primarily at the county level, sales tax measures, inclusionary in-lieu fees paid by market-rate development and jobs-housing linkage fees that new commercial development may pay. Other taxes are being explored by local jurisdictions. The end of this section includes more on county funding.
- **Local Programs include:**
 - Affordable Housing Program: see discussion above.
 - Commercial Linkage Fee (CLF): see discussion above.
- **Private Loans and Grants:** Community-minded banks, community development financial institutions (CDFIs), philanthropy and other private sources are a potential source of funding for affordable housing. In recent years, technology companies based in the Bay Area have been particularly encouraged to participate in solutions to the region's housing crisis and have made commitments to support affordable housing through both loans and grants.

- **Private For-Profit and Nonprofit Sources** include:
 - Community Reinvestment Act (CRA)
 - Private Developers
 - Non-Profit Agencies
 - Housing Endowment and Regional Trust (HEART)
- **San Mateo County:** As a small city, San Bruno has limited resources for implementing housing programs and participates in several State and Federal programs through the San Mateo Department of Housing, a key affordable housing partner for cities in San Mateo County. The County of San Mateo Department of Housing includes both Housing and Community Development (HCD) and the Housing Authority of the County of San Mateo (HACSM). The department issues two annual Notices of Funding Availability (NOFAs)—a HUD program NOFA in the winter and one local funding NOFA in the summer. The county’s local funds NOFA (the Affordable Housing Fund (AHF) is the larger of the two NOFAs and makes funds available from several state and county sources, including Measure K, the county’s 2016 ½ -cent sales tax measure, for the construction and rehabilitation of affordable housing. Cities should reach out to the county early and often to understand whether the AHF, housing authority vouchers, or other county resources may be appropriate for affordable housing projects in their jurisdictions. The HUD programs NOFA and the AHF NOFA are regularly oversubscribed. As a result, the county has developed funding priorities to inform the selection of projects to fund through its NOFAs.

C. ENVIRONMENTAL CONSTRAINTS

Environmental factors such as topography, soils, seismic hazards, noise, and storm flooding are constraints to housing development in the city. In some cases, development is entirely precluded due to human health and safety risks or environmental sensitivity. In other cases, environmental constraints can be mitigated through appropriate residential design. None of these environmental constraints disproportionately impact affordable housing, and policies are provided in the San Bruno 2025 General Plan to specifically address each of these areas in the context of all potential types of development. The General Plan provides maps of floodplains, wildfire hazards, geologic hazards, and other natural resource constraints to development throughout the city. None of the housing opportunity sites fall in a flood or wildfire hazard zone, and none of the sites were found to contain special status wildlife species or their habitat. Redevelopment of these corridors as mixed-use and transit-oriented development was analyzed at a programmatic level in the EIR on the General Plan Update. A summary of pertinent findings is included below.

1. GEOLOGIC AND SEISMIC HAZARDS

Geologic hazards, including landslides, mudslides, and erosion, can be related to seismic activity but can also occur independently. The potential for future landslides is low east of Interstate 280 and west of Skyline Boulevard and is low to moderate (with some pockets of high potential) in the Crestmoor and Rollingwood/Monte Verde neighborhoods. Areas of the highest potential for landslides are in Junipero Serra County Park and along the Park’s eastern edge.

The active San Andreas Fault runs in a northwesterly-southeasterly direction through western San Bruno, roughly along Skyline Boulevard. Two inactive faults—Serra and San Bruno—are also present in the western and eastern portions of the city. Because of its active status, surface rupture potential is considered moderate to high along the San Andreas Fault and in western San Bruno. A strong earthquake along the fault could result in moderate to severe damage of nearby structures. Soils and subsurface materials east of Skyline Boulevard have good earthquake stability. Soils in the vicinity of Pacific Heights, Skyline College, and parts of the Crestmoor neighborhood have poor to good earthquake stability. Eastern portions of the city that are located on filled marsh lands may experience damage from soil liquefaction in the event of an earthquake.

The San Andreas Fault Special Studies Zone runs roughly along either side of Skyline Boulevard. State law requires cities and counties to regulate development within such zones and precludes construction of a structure for human occupancy, except certain wood-frame single-family dwellings, on an active fault trace or within 50 feet of an active fault. This is a major constraint to adding housing in the western (high resource) portion of the city, particularly for sites along Skyline Boulevard, such as the Church of the Highlands, the Caltrans parking lot, or the Caltrans staging lot at Skyline Boulevard and San Bruno Avenue. W. None of the housing opportunity sites in this Housing Element are in earthquake zones.

2. STORM FLOODING

Occasional flooding occurs in low-lying areas in the eastern portion of San Bruno, which consists of filled marshlands. Flooding occurs in these areas because of old storm drain infrastructure and low elevation, which subjects the areas to tidal influences. Spot flooding can occur in residential areas if debris blocks the city's drainage channels. High tide combined with heavy rains results in storm flooding adjacent to residential areas in the eastern portions of the city. This is not considered to be a constraint because none of the housing opportunity sites in this Housing Element are within flood zones.

3. AIR QUALITY

San Bruno is well served by major freeways, I-280, I-380, and U.S. 101. However, the air quality impacts from the freeways are primarily borne by neighborhoods adjacent to the freeways. Though some of the emission is carried away due to strong winds that come through the San Bruno Gap, air pollution is more prevalent in the under resourced neighborhoods that are adjacent to the I-380 and U.S. 101 freeways. As a result, the neighborhoods in census tract 6041.04 have been identified as neighborhoods with poor environmental scores pursuant to Calenviroscreen. These neighborhoods are also under resourced and have a higher population of Hispanic residents and residents who are burdened by housing costs.

4. NOISE

Aircraft overflight noise is an important issue in San Bruno due to the city's proximity to SFO. SFO is located to the east of San Bruno, across U.S. 101. The airport has four runways, of which two are east-west (10R-28L and 10L-28R) and two are north-south (1L-19R and 1R-19L). Northeastern portions of San Bruno are situated beneath flight tracks for arrivals and departures on runways 10R-28L and 10L-28R. The overflight noise primarily impacts the neighborhoods east of San Mateo Avenue.

The eastern portions of the city closest to SFO are most affected by overflight noise. Average noise levels are measured by decibels (dB) and community noise equivalent levels (CNEL). At a noise level of 65-69 dB CNEL, new residential development is required to have noise reduction analysis and noise insulation as needed. At 70 dB CNEL and above, new residential development is inconsistent with the Airport Land Use Plan (ALUP), which essentially means that new residential development and/or redevelopment requires an Airport Land Use Commission (ALUC) override by the San Bruno City Council in the areas surrounding the BART and Caltrain stations, as well as in portions of the Belle Air Park North neighborhood. The Tanforan site falls within the 70 dB airport noise contour, therefore, housing development on this site is considered an incompatible use in the ALUP. The City will need to override the SFO ALUCP with a 2/3 vote of City Council in order to provide housing on the Tanforan site. If the override is successful, new housing construction on the Tanforan site will be held to higher standards for noise insulation which will result in higher costs for development relative to development on parcels not impacted by overflight noise.

Many of the same neighborhoods (Census Tract 6041.04) in San Bruno that are impacted from overflight noise are also exposed to noise generated by traffic on I-280, I-380, and U.S. 101. El Camino Real is another heavily traveled



roadway that generates higher than normal amounts of noise. Traffic noise from El Camino Real depends primarily on traffic speed.

There is also a railroad in San Bruno which impacts the noise environment of nearby neighborhoods. These tracks run adjacent to Huntington and Herman Avenues and service Caltrain and several freight trains.

The eastern neighborhoods in San Bruno that are impacted by noise are impacted from all the noise sources described above. Noise is considered a constraint to housing production in the eastern portion of the city because the housing units will need to be built to higher noise insulation standards which will increase building costs. The City requires new housing units in noise impacted neighborhoods to include insulation which reduces interior noise levels to 45 dBA or less.

5. HAZARDOUS MATERIALS

Hazardous materials regulations, which are codified in Titles 8, 22, and 26 of the California Code of Regulations (CCR), and their enabling legislation set forth in Chapter 6.95 of the California Health and Safety Code, were established at the state level to ensure compliance with federal regulations to reduce the risk to human health and the environment from the routine use of hazardous substances. These regulations must be implemented, as appropriate, and are monitored by the state (e.g., Cal OSHA in the workplace or the DTSC for hazardous waste) and/or local jurisdictions.

As with many infill urban locations, many of the housing element housing opportunity sites are nonvacant commercial properties. These properties sometimes have environmental issues related to the prior use. The extent of hazardous materials within the housing element sites is unknown but will be evaluated when a development application is submitted. Any hazardous materials discovered as a result of the environmental review process will be remediated of hazardous materials to allow for residential use.

D. MARKET AND OTHER NON-GOVERNMENTAL CONSTRAINTS

Market constraints significantly affect the cost of housing and can pose barriers to housing production and affordability.

1. VACANT/UNDERDEVELOPED LAND

San Bruno is in an urbanized portion of San Mateo County and has no unconstrained vacant land on which new housing can be constructed. Steep slopes and seismic constraints limit development in the hilly western portions of the city, while the central and eastern portions have been built out since the 1960s. New development over the last 7 years has been limited to redevelopment opportunities. As part of the development of the Transit Corridors Plan (TCP), redevelopment and intensification opportunities have been identified along the city's main commercial corridors: the sites identified in this Housing Element are primarily located along El Camino Real (Highway 82), San Mateo Avenue, San Bruno Avenue, and at the Tanforan mall site. Parcels within the TCP are relatively small. Because of high densities permitted, significant projects can be achieved even on small sites, and sites adjacent to each other and could be assembled into a larger development opportunity site.

2. OVERCOMING CHALLENGES OF SMALL SITES

San Bruno recognizes the challenges associated with building affordable housing on small sites. Of the over 60 parcels listed as housing opportunity sites in the next chapter, the majority are already consolidated under existing ownership into lots that are about 20,000 square feet in size or larger. Furthermore, the General Plan allows unlimited housing density for sites 20,000 square feet or larger within the TCP area, which encourages lot consolidation.

3. RESIDENTIAL LAND COSTS

Land costs in San Mateo County are high, due in part to the desirability of housing in the county, and because available land is in short supply. These costs vary both between and within jurisdictions based on factors like the desirability of the location and the permitted density. It is anticipated that land costs within the city's Priority Development Area will increase over time as new development replaces existing, older land uses, infrastructure improvements take place and the desirability of living closer to transit and amenities increases. Rising land values resulting from the area becoming more desirable may lead to increased market rents. This may impact existing lower-income residents through increased housing costs, housing overpayment, overcrowding, and deteriorating housing conditions. Lower income households will disproportionately experience substandard housing conditions. These households may experience direct displacement caused by the redevelopment of sites with existing residential properties, or indirect, caused by increasing rents. The Housing Element includes several programs to address the issue of displacement of lower income residents.

4 Affirmatively Furthering Fair Housing



A. WHAT IS AFFIRMATIVELY FURTHERING FAIR HOUSING?

Affirmatively furthering fair housing (AFFH) 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, Section 8899.50, subd. (a)(1)).

The State of California's 2018 Assembly Bill (AB) 686 requires that all public agencies in the state AFFH beginning January 1, 2019. Public agencies receiving funding from the U.S. Department of Housing and Urban Development (HUD) are also required to demonstrate their commitment to AFFH. The federal obligation stems from the fair housing component of the federal Civil Rights Act mandating federal fund recipients to take "meaningful actions" to address segregation and related barriers to fair housing choice. AB 686 requires all public agencies to "administer programs and activities relating to housing and community development in a manner that AFFH and take no action inconsistent with this obligation." AB 686 also makes changes to Housing Element Law to incorporate AFFH as part of the housing element and general plan and to include an analysis of fair housing outreach and capacity, integration and segregation, access to opportunity, disparate housing needs, and current fair housing practices.

AB 686 requires that the Housing Element's evaluate sites relative to their effect on fair housing. The purpose of the site inventory is to identify and analyze specific sites that are available and suitable to accommodate the regional housing need, but also whether the identified sites serve the purpose of:

- Replacing segregated living patterns with truly integrated and balanced living patterns.
- Transforming racially and ethnically concentrated areas of poverty into areas of opportunity.

Sites must be identified and evaluated relative to the full scope of the assessment of fair housing, which includes:

- Segregation and integration.
- Racially and ethnically concentrated areas of poverty and affluence.

- Access to opportunity.
- Disproportionate housing needs and displacement risk.

B. FAIR HOUSING ASSESSMENT

As part of the 21 Elements process which facilitates the completion of Housing Elements for all San Mateo County jurisdictions, Root Policy provided a Fair Housing Assessment for the San Bruno which follows the April 2021 State of California Guidance for AFFH. The report includes a history of segregation in the region, an assessment of Fair Housing in San Bruno, a resident needs survey, and an analysis of contributing factors and associated Fair Housing Action Plan (FHAP) outlining policies and actions to address those factors. The assessment is included as Appendix C. Please note, only portions of the FHAP have been incorporated into the City's programs in Chapter 7.

Appendices C to I include the following supplemental AFFH materials:

- Appendix C: San Bruno Fair Housing Assessment
- Appendix D: San Bruno AFFH Map and Data Packet
- Appendix E: San Bruno AFFH Segregation Report
- Appendix F: AFFH Resident Survey Analysis
- Appendix G: San Bruno Sites Inventory AFFH Supplement
- Appendix H: Disparate Access to Educational Opportunities
- Appendix I: State Fair Housing Laws and Regulations

Chapter 4 of this Housing Element is San Bruno's assessment of fair housing and site inventory analysis and includes the following sections:

Fair Housing Assessment: Fair Housing Enforcement and Outreach Capacity, reviews lawsuits, enforcement actions, and complaints against the jurisdiction, compliance with state fair housing laws and regulations, and jurisdictional capacity to conduct fair housing outreach and education.

Fair Housing Assessment: Integration and Segregation, identifies areas of concentrated segregation, degrees of segregation, and the groups that experience the highest levels of segregation, including measures of segregation within San Bruno and between San Bruno and other Bay Area jurisdictions.

Fair Housing Assessment: Access to Opportunity, examines differences in access to education, transportation, economic development, and healthy environments.

Fair Housing Assessment: Disproportionate Housing Needs, identifies which groups have disproportionate housing needs including displacement risk.

Parts 2, 3, and 4 of the Fair Housing Assessment (Integration and Segregation, Access to Opportunity, and Disproportionate Housing Needs) include analysis of the City's site inventory and specific findings that evaluate San Bruno's RHNA sites relative to their impact on fair housing. The site inventory findings in part evaluate whether the development of the sites in the inventory will further exacerbate or help reverse patterns of segregation and/or concentrations of protected classes and/or vulnerable populations. The analysis reviews concentrations of fair housing factors alongside the distribution of sites in the city and the expected income levels of future housing.



C. RESIDENT NEEDS FAIR HOUSING SURVEY

Appendix F reports findings from a San Mateo County resident survey conducted by Root Policy to support the AFFH analysis. It explores residents' housing, affordability, and neighborhood challenges and experiences with displacement and housing discrimination. The survey also asks about residents' access to economic opportunity, captured through residents' reported challenges with transportation, employment, and K-12 education. The survey was offered in both English and Spanish.

1. CITY OF SAN BRUNO RESIDENT NEEDS FAIR HOUSING SURVEY FINDINGS

Among San Bruno residents, there were 99 survey responses. Of the 99 responses, 48 were homeowners, 41 were renters, 36 were White, 19 were Asian, and 13 were Hispanic. Forty respondents earned over \$100,000/year, 22 earned \$50,000-\$99,999/year and 11 earned less than \$25,000/year. Thirty-seven households that responded had children under the age of 18, 34 households had a household member with a disability, 32 households had an older adult (over age 65+), and 21 households were single parent households.

The following is a summary of survey findings that were unique to the City of San Bruno survey respondents.

HOUSING AND NEIGHBORHOOD CHALLENGES

The survey asked about different housing challenges experienced by residents. While some jurisdictions reported certain housing challenges at a higher rate than the Countywide average, San Bruno respondents did not. When identifying housing challenges, San Bruno residents responded in the same way as the average county resident on all questions. Both the county average (31%) and San Bruno (30%) most frequent challenge was "I would like to move but can't afford anything that is available/my income is too low." The second most frequent challenge was "My house or apartment isn't big enough for my family" (20% countywide and 20% for San Bruno). In 4 of the 11 challenges included in the survey, San Bruno respondents experienced challenges at a lower frequency than the average county resident. For the most part San Bruno residents experienced specific neighborhood challenges at a similar rate as county residents, however, San Bruno residents responded that "Schools in my neighborhood are poor quality" at a higher rate than the county average.

DENIED HOUSING TO RENT OR BUY

The survey looked at the proportion of those who looked for and were denied housing to rent or buy for the county and jurisdictions. While "Income too low" was a major reason for denial for almost all jurisdictions, in San Bruno it was not. Another top denial reason was "landlord didn't accept the type of income I earn (social security or disability benefit or child support)." San Bruno was among the jurisdictions that were more likely to have denial rates of 25% or higher because of "type of income earned."

DISPLACEMENT

Respondents that had experienced displacement were asked to identify which city they moved from and which city they moved to. One of the most common moves to and from cities included San Bruno residents moving to South San Francisco (nine respondents).

IMPROVING HEALTH

When asked what could improve a respondent's health situation, most respondent groups by jurisdiction, race/ethnicity, tenure, income, and other selected housing characteristics selected "Make it easier to exercise" and "More healthy food." Additionally, 29% of San Bruno respondents identified "Better access to mental health care" as a solution to help improve their health situations.

2. COUNTYWIDE SURVEY FINDINGS

A total of 2,382 residents participated in the county-wide survey. The survey data present a unique picture of the housing choices, challenges, needs, and access to economic opportunity of San Mateo County residents.

HOUSING DISCRIMINATION

Overall, 19% of survey respondents countywide felt they were discriminated against when they looked for housing in the area. African American survey respondents (62%), single parent households (44%), and precariously housed respondents (39%) are most likely to say they experienced housing discrimination. Residents with income above \$100,000 and homeowners are least likely (11%).

Respondents who believed they experienced discrimination when looking for housing were asked to describe the actions they took in response to the discrimination. Overall, the most common responses to discrimination experienced by survey respondents were "Nothing/I wasn't sure what to do" (42%), "Moved/found another place to live" (30%), and "Nothing/I was afraid of being evicted or harassed" (20%).

DENIED HOUSING TO RENT OR BUY

Nearly 4 in 10 county respondents who looked for housing experienced denial to rent or buy. African American/Black respondents, precariously housed respondents, households with income below \$50,000, and single parent respondents have denial rates of 60% or higher. African American (79%) and single parent (74%) respondents report the highest rates of denial.

DISPLACEMENT

Overall, 21% of county-wide survey respondents experienced displacement in the past five years. Among all survey respondents, the main reason for displacement was "rent increased more than I could pay" (29%). For households with children that were displaced in the past five years, 60% of children in those households have changed schools. The most common outcomes identified by households with children who have changed schools include: "school is more challenging," "feel less safe at the new school," and "are in a worse school" after moving.

VOUCHERS

The limited supply of housing that accommodates voucher holders presents several challenges. Specifically, eight out of 10 voucher holders represented by the survey find a landlord that accepts a housing voucher to be "difficult" or "very difficult." According to the survey, vouchers not being enough to cover the places residents want to live is a top impediment for residents who want to move in San Mateo County, as well as for African American, Asian, and Hispanic residents, households with children under 18, single parents, older adults, and households with a member experiencing a disability.



EXPERIENCE OF PERSONS WITH DISABILITIES.

Overall, 35% of respondents' households include a member experiencing a disability. Of these households, 26% said their housing does not meet their accessibility needs; 74% report that their current housing situation meets their needs. The three top greatest housing needs expressed by respondents included grab bars in bathrooms or benches in showers (34%), supportive services to help maintain housing (33%), and ramps (26%).

TRANSPORTATION

Over 80% of respondents indicated the type of transportation used most often is driving a personal vehicle. This share was relatively similar across the majority of jurisdictions and was the number one type of transportation used across all jurisdictions and demographic characteristics. On average respondents are fairly satisfied with their transportation situation.

3. RESIDENT SURVEY CONCLUSIONS

Overall, San Bruno survey data tends to mirror countywide average survey results. The survey shows that in both the county and San Bruno, being low-income is a barrier to accessing housing. The impacts are highest for Hispanic households. In San Bruno, 27% of overall households are Hispanic and 44% of households are low-income. Hispanic households are also more likely to experience overcrowding and to be cost burdened (the rates of overcrowding and rates of cost burden in the county and Bay area overall are similar to the rates in San Bruno).

D. FAIR HOUSING ENFORCEMENT AND OUTREACH CAPACITY

The following is a summary of Fair Housing Enforcement and Outreach Capacity for San Bruno and figures referenced are in Appendix D (San Bruno AFFH Map and Data Packet).

1. ENFORCEMENT

Four of the 57 total fair housing complaints filed in San Mateo County from 2017 to 2021 were in San Bruno, or 7%. The city accounts for 6% of the County's population. Issues cited were refusal to rent, refusal to rent and negotiate for a rental, discrimination in terms, conditions, privileges relating to a rental, and failure to make a reasonable accommodation. All four fair housing complaints in the city were on the basis of disability status.

Fair housing complaints filed with HUD by San Mateo County residents have been on a declining trend since 2018, when 18 complaints were filed. In 2019, complaints dropped to five, increased to 11 in 2020, and had reached six by mid-2021. The City of San Bruno has not been a party to state or federal fair housing complaints or legal action in the past nor has the City been required to operate under a state or federal consent decree related to fair housing. There have been no fair housing enforcement actions at the local level. San Bruno enforces and complies with fair housing laws and regulation by regularly reviewing City policies and programs for impediments to fair housing choice and compliance with state and federal law and by referring fair housing complaints to appropriate agencies.

The City of San Bruno is compliant with state laws that promote fair and affordable housing including the Density Bonuses and Other Incentives Law (Gov. Code, Title 7, Division 1, Chapter 4.3, Density Bonuses and Other Incentives amended and effective January 1, 2021) and the Housing Accountability Act (Gov

Code Section 65589.5) requiring adoption of a Housing Element and compliance with RHNA allocations. The City also has an implementation program in this Housing Element to increase fair housing education and support.

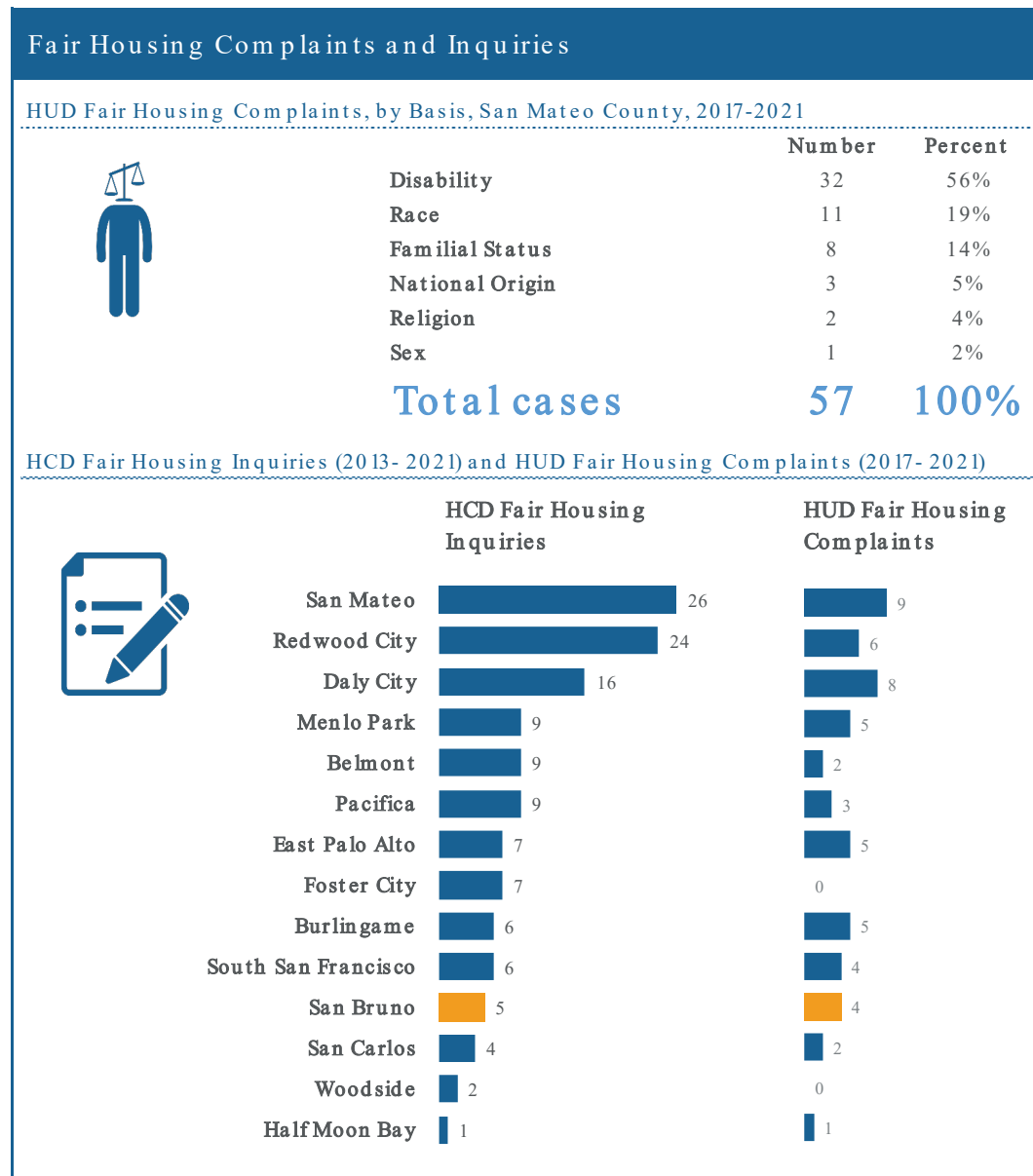


Figure 4-1 Fair Housing Complaints and Inquiries

Source: HUD.

2. OUTREACH

San Bruno residents are served by multiple fair housing service providers, including Project Sentinel, the Legal Aid Society of San Mateo County, and Community Legal Services of East Palo Alto. These organizations receive funding from the County and participating jurisdictions to support fair housing enforcement and outreach and education in the County.

The City of San Bruno could improve the accessibility of fair housing information on its website and resources for residents experiencing housing discrimination. Although the City’s website provides information regarding fair housing resources, it is not easily found and is not located on the main housing webpage.¹ Overall, the accessibility of fair housing information could be improved by providing information on the Fair Housing Act, AFFH-related information for the state of California, contact information for local fair housing organizations, legal assistance, and general information in one consolidated place. Additionally, a link to the Regional Assessment of Fair Housing approved by HUD in November 2017 could be provided.

3. HOUSING POLICIES ENACTED LOCALLY

The City of San Bruno identified the following local policies that contribute to the regulatory environment for affordable housing development in the city. The policies illustrate the capacity of San Bruno to further fair housing within the city and are described in the Programs chapter of this Housing Element.

<p>Local policies in place to <u>encourage</u> housing development.</p> <ul style="list-style-type: none"> ▪ Mixed Use Zoning ▪ Condominium Conversion Ordinance ▪ Housing Development Impact Fee ▪ Commercial Development Impact Fee ▪ Second Unit Ordinance ▪ Density Bonus Ordinance 	<p>Local <u>barriers</u> to affordable housing development.</p> <ul style="list-style-type: none"> ▪ Height limits on multi-family developments ▪ Voter initiatives that restrict multi-family developments, rezoning for higher density, height limits or similar measures ▪ Excessive parking requirements ▪ No policies to mitigate displacement of low-income households
<p>Local policies that are NOT in place but would provide the best outcomes in addressing housing shortages.</p> <ul style="list-style-type: none"> ▪ Rental assistance or rent subsidies <p>Local policies that are NOT in place but have potential for further exploration.</p> <ul style="list-style-type: none"> ▪ Community land trusts ▪ Dedicating surplus land for affordable housing 	<p>Local policies in place to mitigate or prevent displacement of low-income households.</p> <ul style="list-style-type: none"> ▪ Affordable housing impact/linkage fee on new residential and commercial development ▪ Inclusionary zoning ▪ Promoting streamlined processing of ADUs

4. PUBLIC HOUSING AND HOUSING VOUCHERS

According to the California Department of Housing and Community Development AFFH Data Viewer, the City of San Bruno does not have any public housing buildings. However, the City does have one census tract with a sizable share of household units with housing vouchers (15% to 30%), three tracts with a moderate share (5% to 15%), and three tracts with some (5% or less) housing voucher utilization (Appendix D, Figure I-7). Compared to nearby Millbrae, Burlingame, and Hillsborough, San Bruno appears accommodating to renters with housing vouchers because the city has a greater share of voucher holders compared to the surrounding communities. The presence of housing voucher users indicates available rental supply to house these residents and a lack of exclusionary behavior from landlords in the city.

¹ https://www.sanbruno.ca.gov/gov/city_departments/commdev/housing/default.htm.

E. INTEGRATION AND SEGREGATION

This section discusses integration and segregation of the population by some protected classes and vulnerable populations, including race and ethnicity, disability status, familial status, and income status. It describes concentrations of vulnerable populations geographically throughout the city. The section also describes patterns of segregation and integration at a local level and at a regional level, comparing the city to the region and to other Bay Area jurisdictions.. The section also discusses how the proposed site inventory and the potential income levels of units to be developed in the future may impact existing patterns of segregation and integration.

To support this analysis of segregation and integration within San Bruno and a regional comparison, the Association of Bay Area Governments (ABAG) and the University of California at Merced (UC Merced) completed an analysis of segregation in San Bruno (Appendix E). Several indices were used to assess segregation in the City and determine how it differs from patterns of segregation and integration in the region. The dissimilarity, isolation, and Theil's indices are used below to analyze race/ethnicity and income in San Bruno and regionally.

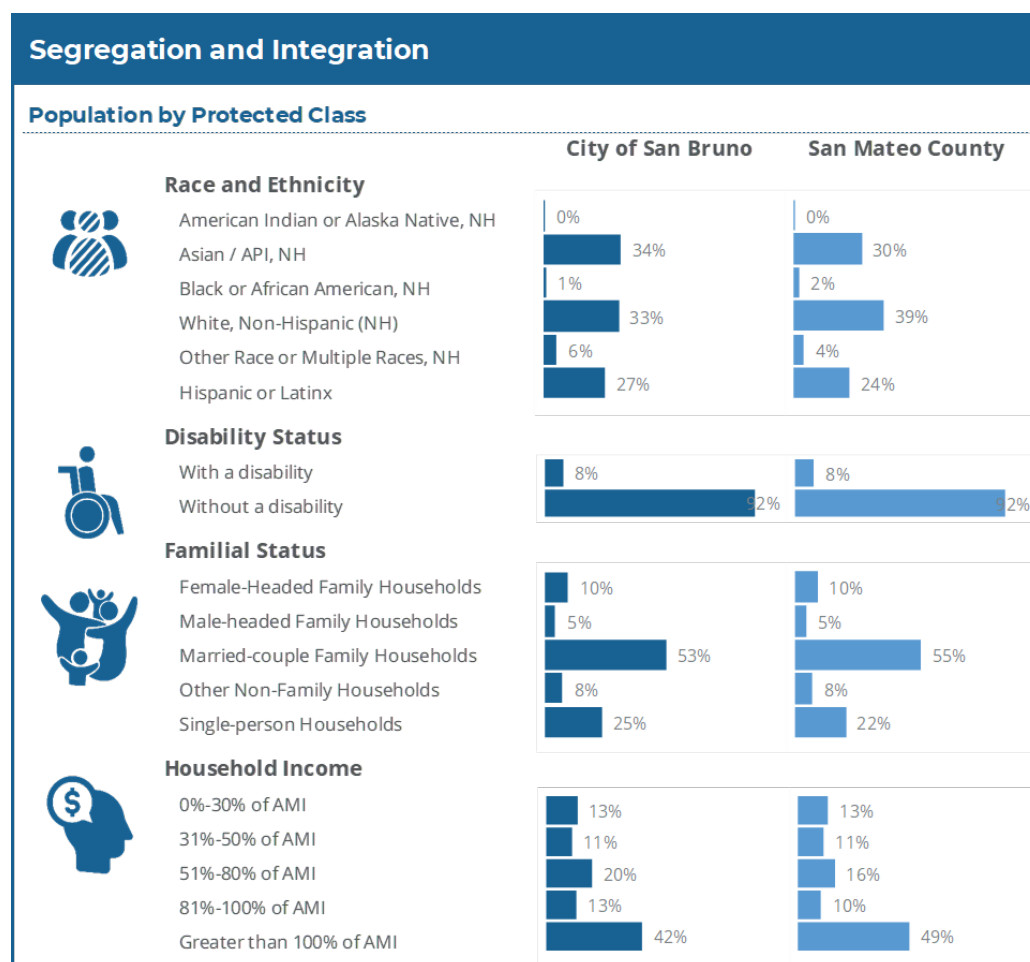


Figure 4-2 Segregation and Integration Key Fair Housing Factors

Source: HUD.

1. INTEGRATION AND SEGREGATION: RACE AND ETHNICITY

HOW DOES SAN BRUNO COMPARE TO OTHER JURISDICTIONS AND SAN MATEO COUNTY

San Bruno's residents are more racially and ethnically diverse than residents in the county and the Bay Area overall because San Bruno has a higher share of residents who are Asian and Hispanic. The largest proportion of the population of the City of Bruno is Asian (34%), followed by non-Hispanic White (33%), Hispanic (27%), other or multiple races (6%), and Black (1%). Older residents are less diverse, with 62% of the population older than 65 years identifying as White compared to only 40% of the population for children less than 18 years old.

San Mateo County is primarily made up of White majority census tracts. The County has pockets of Hispanic majority census tracts along the Highway 101 corridor adjacent to the San Francisco Bay—primarily in East Palo Alto, Redwood City, San Mateo, South San Francisco—and San Bruno. In the county overall, concentrations of Asian majority census tracts are primarily in Daly City and South San Francisco; San Bruno has fewer Asian concentrated areas than these peer cities. There are also fewer concentrations of Asian residents in Millbrae and Foster City.

The isolation and dissimilarity indices show that segregation exists in San Bruno, particularly in the Latinx/Hispanic and Asian communities as well as in lower-income communities. While segregation patterns appear to be declining over time, San Bruno is slightly more racially segregated than other Bay Area jurisdictions.

SAN BRUNO ISOLATION AND DISSIMILARITY INDICES: RACE AND ETHNICITY AT THE LOCAL LEVEL

- In San Bruno, Asian residents are the most segregated compared to all other racial groups and Hispanic residents are most segregated from White residents. Neighborhood racial segregation in San Bruno has declined over the last decade.
- As of 2020, Asian residents are the most segregated compared to other racial groups in San Bruno, as measured by the isolation index. Asian residents live in neighborhoods where they are less likely to encounter other racial groups. The reason for this may be that this is a geographical area where a particular ethnic group is spatially clustered and socially and economically distinct from the majority group. The west side of San Bruno, West of Skyline Blvd. includes census tracts with predominant Asian majority by a sizeable gap of more than 10% (Appendix D, Figure II-8). This area coincides with San Bruno's High Resource Areas and is associated with highly positive economic outcomes, according to TCAC/HCD, suggesting residents within these neighborhoods face fewer barriers to economic mobility (Appendix D, Figure III-14).
- According to the dissimilarity index, within San Bruno the highest level of racial segregation is between Hispanic/Latinx and White, Non-Hispanic residents.
- Among all racial groups, the White, Non-Hispanic resident population isolation index value has changed the most over time, becoming less segregated from other racial groups between 2000 and 2020.
- According to the Theil's H-Index, neighborhood racial segregation in San Bruno declined between 2010 and 2020.

SAN BRUNO ISOLATION AND DISSIMILARITY INDICES: RACE AND ETHNICITY AT THE REGIONAL LEVEL

- On average across the Bay Area, San Bruno has a lower proportion of Black residents (1% versus 6% in the Bay Area), a higher proportion of Latinx residents (27% versus 24%), a higher proportion of Asian residents (34% versus 28%), and a lower proportion of White residents (33% versus 36%).
- Regionally, the Bay Area average isolation index is lower for Asian and Latinx/Hispanic residents, but higher for White and Black residents (compared to San Bruno), indicating that Hispanic/Latinx residents are more segregated in San Bruno than in the Bay Area. White residents are more integrated in San Bruno than in other Bay Area cities.
- Compared to other Bay Area jurisdictions, the Thiel's index for racial segregation in San Bruno is slightly above average, indicating that San Bruno neighborhoods are slightly more segregated compared to other Bay Area jurisdictions.

2. SITE INVENTORY ANALYSIS FINDINGS: RACE AND ETHNICITY

Geospatially, San Bruno has three census tracts with sizable White majorities and one census tract with a slim White majority (Figure 4-3). Additionally, two other census tracts have sizable Hispanic majorities and three other have Asian majorities—two sizable and one slim. It's worth noting that these census tracts of majority populations by race and ethnicity are relatively segregated. White majorities are located in the southern portion of the city, Asian majorities are located in the north and northwestern portions, and Hispanic majorities are in the eastern portion of the city.

As shown in Figure 4-3, San Bruno's proposed RHNA sites are distributed relatively evenly among the three predominant populations within the city boundaries, with slightly more sites in areas with higher concentrations of Asian and Latino households. However, because the Tanforan Development opportunity accounts for 1,000 housing units, significantly more than half of San Bruno's site inventory is located within this census tract (with a predominantly Asian population). The Tanforan site is in a relatively diverse area with a predominantly Asian/Asian Pacific Islander population (49%) but also Hispanic (17%) and White Non-Hispanic (25%) populations present. The ATT Center which will provide 320 units is another significant San Bruno site located across the street from the Tanforan development and will provide much needed affordable units in this area. Tanforan and the ATT Building are also adjacent to census tract 6041.04, which is predominantly low-income and Hispanic. As a result, these housing developments will also serve lower-income Hispanic neighborhoods nearby. Providing affordable units in an area of the city that is in close proximity to neighborhoods with multiple dominant racial groups in the city as well as in close proximity to lower and moderate-income neighborhoods is an important strategy for preserving affordability in existing moderate- and lower-income neighborhoods.



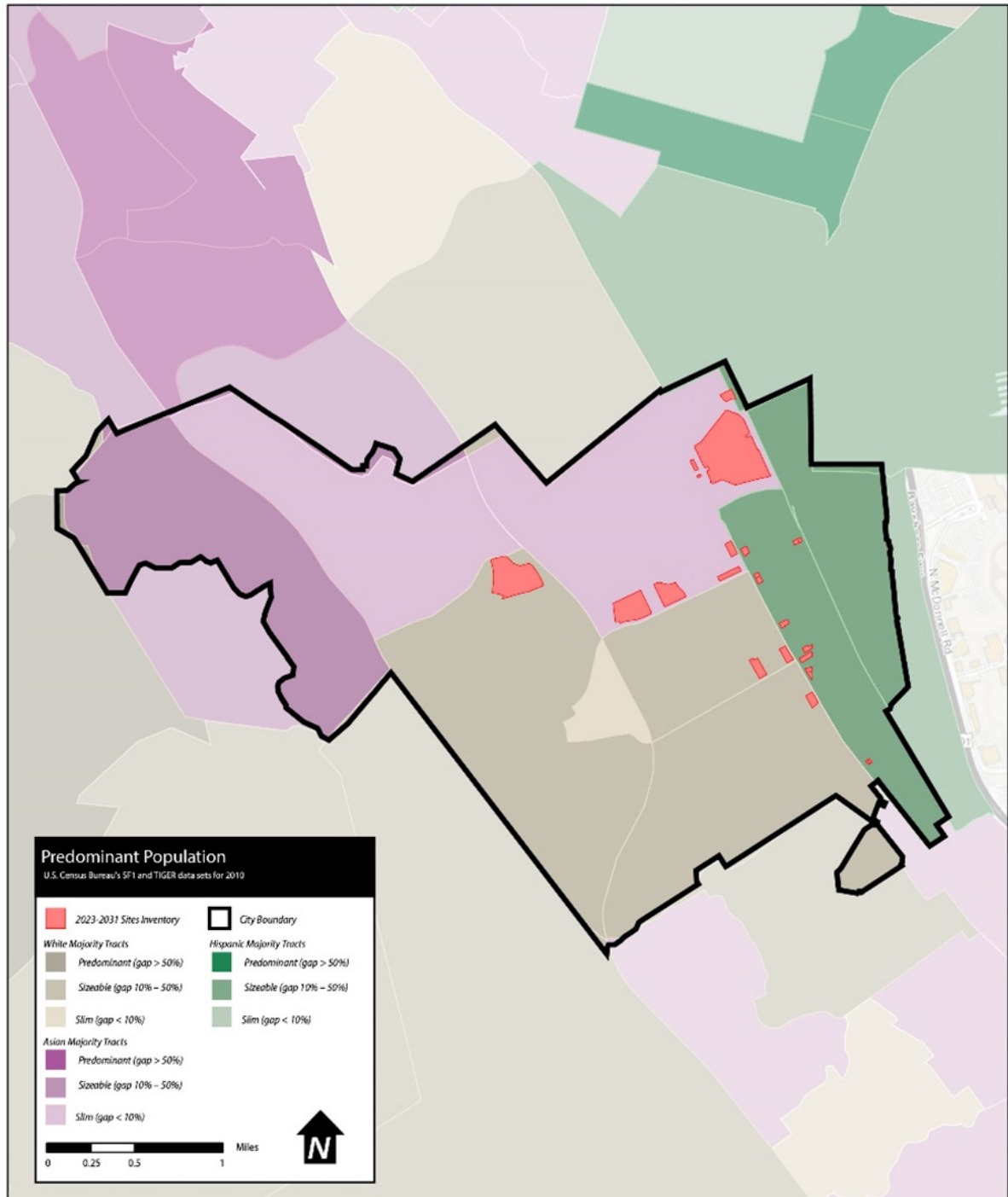


Figure 4-3 Proposed RHNA Sites in Relation to Predominant Populations by Census Tract

Source: California Department of Housing and Community Development, AFFH Data and Mapping Resource 2022, City of San Bruno 2022.

The proposed site distribution will not exacerbate race and ethnic segregation because:

- Due to the number of units in the Tanforan development (350 lower and moderate income units) and other significant sites such as the ATT Building (170 lower and moderate income units), Bayhill Shopping Center (112 lower and moderate income units), Traeger Office Building (109 lower and moderate income units), and the Chili's Restaurant (53 lower and moderate income units) the majority of San Bruno's proposed sites will create the most housing in one census tract (6041.02) that has a concentration of Asian residents. However, these sites are adjacent to an area of the city with majority Hispanic and lower income population (census tract 6041.04) and will therefore provide needed lower and moderate-income housing for existing residents.
- The sites located in census tract 6041.02 (Tanforan, ATT Building, etc.) are accessible to multiple neighborhoods with excellent access to transit as well as close proximity to neighborhoods with multiple races and ethnicities represented.
- The Tanforan site and surrounding sites such as the ATT Building site will provide affordable units accessible to lower income residents.
- Although the occupants of the new housing will ultimately determine how new development contributes to racial and ethnic concentrations, the proposed distribution should reduce segregation by providing additional housing options in a central area that is easily accessible and in close proximity to Asian and Hispanic neighborhoods that are moderate and low income.
- Figure 4-4 shows census tracts by neighborhood segregation typology, specifically the predominant racial and ethnic makeup of renter households in those tracts. Nearly all of the City's proposed RHNA sites are located in the "4 Group Mixed" typology — a combination of Asian, Latino, Other Race, and White renter households. The remainder of the sites are located in the "3 Group Mixed" typology — a combination of Asian, Latino, and White renters. In relation to these typologies, overall, no one racial/ethnic group has disproportionately "less access" (i.e., further in proximity) to the proposed RHNA sites. Development of the sites will not exclude or isolate any racial or ethnic groups from accessing the units based on proximity from cultural enclaves and/or established communities.
- Census Tract 6041.03 and 6041.04 are two of three of San Bruno's lowest income census tracts and are also predominantly Hispanic. These were analyzed together because they have the same scores/measures for all fair housing indicators for segregation and integration, access to opportunity and disproportionate housing need and there are only 6 housing units in 6041.03. This area encompasses a large swath of the city extending from Lomita Park in the south to I-380, between El Camino Real and Huntington Ave (central part of the city which encompasses downtown). There are 10 opportunity sites located in this area which include 443 housing units and are expected to produce 289 moderate and above moderate-income units and 154 very low- and low-income units. Providing lower-income units in this area will provide needed housing to lower-income groups that reside there. In addition, the sites within this census tract are adjacent to or in close proximity to 634 very low-income and low-income units expected to be developed nearby on the edge of Census Tract 6041.02 (Tanforan and other sites in 6040.02).
- Census Tract 6042 is San Bruno's lowest income census tract and is also predominantly Hispanic. This census tract encompasses neighborhoods east of Huntington Ave and west of Highway 101, between Huntington Ave and Herman Street across the street from Tanforan. There are no opportunity sites in census tract 6042 because residential areas are built out and while there are nonvacant commercial sites available for development, the area is encumbered by SFO Airport Land Use Compatibility Plan (ALUCP) which specifies residential as an incompatible land use because of noise.

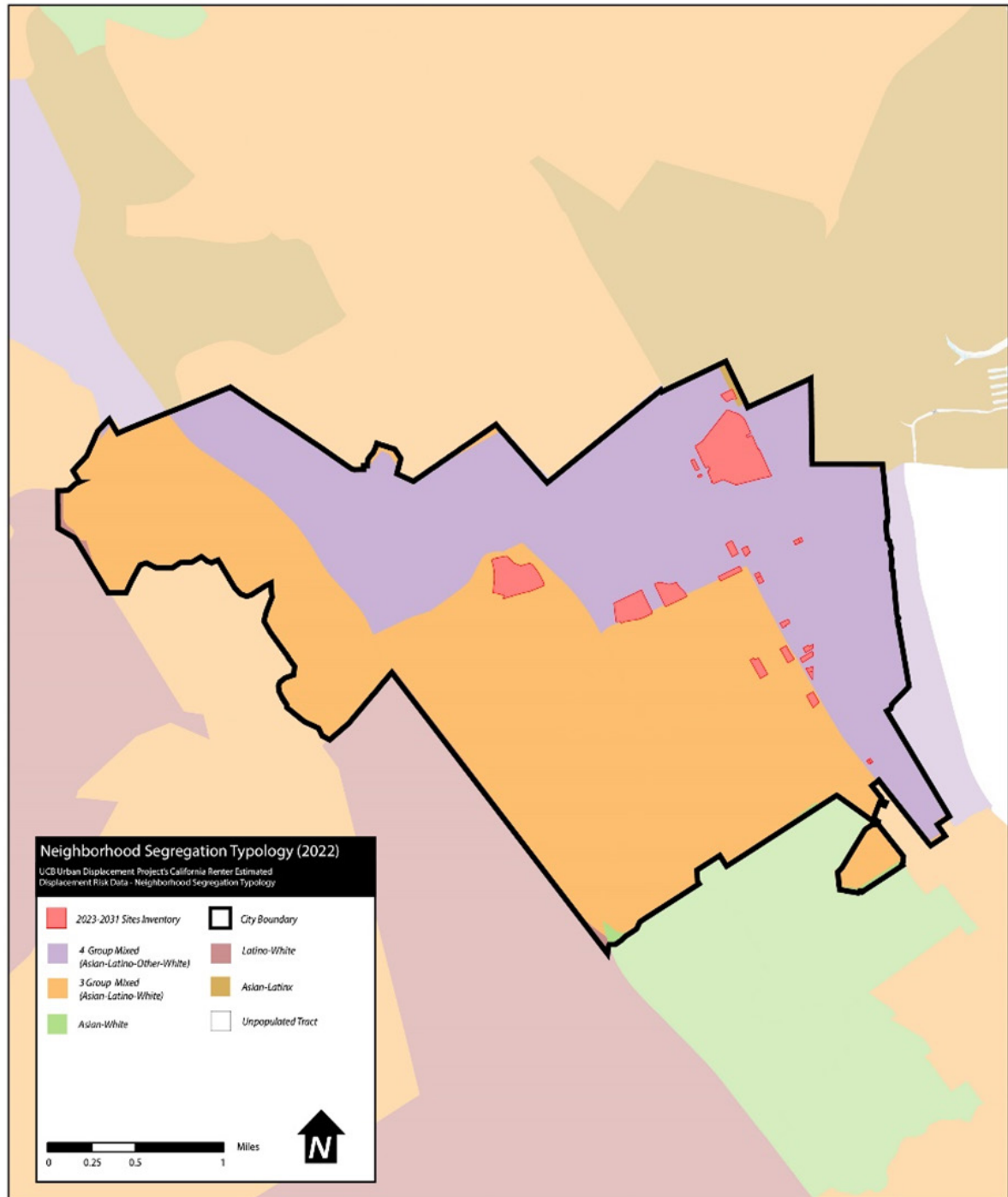


Figure 4-4 Proposed RHNA Sites in Relation to Neighborhood Segregation Typologies

Source: California Department of Housing and Community Development, AFFH Data and Mapping Resource 2022, City of San Bruno 2022.

- These lower income, predominantly Hispanic census tracts (6041.03, 6041.04 and 6042) have no concentrations of households with a disability and no concentrations of female-headed households, but they do have higher poverty, more environmental hazards, and also concentrations of cost burdened and overcrowded households.

3. INTEGRATION AND SEGREGATION: INCOME

HOW DOES SAN BRUNO COMPARE TO OTHER JURISDICTIONS AND SAN MATEO COUNTY

The household income distribution by percent of area median income (AMI) in San Bruno is similar to the county (Appendix D, Figure II-25). However, the city has a smaller proportion of households making greater than 100% AMI (42%) than the county (49%). There are three census tracts in the city that have median incomes below the 2020 state median income of \$87,100 for a family of four, but most census tracts have median incomes well above that (Figure 4-5). There is a concentration of census tracts west of Interstate 280 with median incomes greater than \$125,000. All census tracts in San Bruno have poverty rates below 10% (Appendix D, Figure II-28).

Racial and ethnic minority populations generally have higher rates of poverty compared to the non-Hispanic White population in San Bruno (Appendix D, Figure II-4 and Figure II-5). Additionally, Other/Multiple races, American Indian or Alaska Native and Hispanic households have lower household incomes compared to non-Hispanic White households in San Bruno.

The isolation and dissimilarity indices show that segregation exists in San Bruno, particularly in the lower-income communities. Some groups, however, such as higher income residents, are less segregated in San Bruno compared to the Bay Area.

SAN BRUNO ISOLATION AND DISSIMILARITY INDICES: INCOME AT THE LOCAL LEVEL

- In San Bruno, upper income neighborhoods are more segregated from other income groups, but the level of segregation has declined over time.
- Above moderate-income residents are the most segregated compared to other income groups in San Bruno as measured by the isolation index. Above moderate-income residents live in neighborhoods where they are less likely to encounter residents of other income groups.
- Among all income groups in San Bruno, the above moderate-income population's segregation measure has changed the most over time, becoming less segregated from other income groups between 2010 and 2015.
- According to the dissimilarity index, segregation between lower-income residents in San Bruno and residents who are not lower-income in San Bruno has decreased between 2010 and 2015.
- According to the Theil's H-Index, neighborhood income segregation declined between 2010 and 2015.

SAN BRUNO ISOLATION AND DISSIMILARITY INDICES: INCOME AT THE REGIONAL LEVEL

- In 2015, the income segregation in San Bruno between lower-income residents and other residents was higher than the average value for Bay Area jurisdictions.
- For low-income residents (50%-80% AMI), San Bruno has an isolation index of 27; one of the highest among Bay Area jurisdictions and indicating that low-income residents in San Bruno live in neighborhoods that are more than one-quarter (25%) low-income.



- In San Bruno, the isolation index for above moderate-income is 30, which is well below the above moderate-income average isolation index among Bay Area jurisdictions. This indicates San Bruno's above moderate-income residents are more integrated than above moderate-income residents in other jurisdictions in the Bay Area.
- Low-income residents make up 25% of San Bruno's overall population (the third highest proportion for 109 jurisdictions in the Bay Area). Moderate-income residents make up 24% of San Bruno residents (the 4th highest in the Bay Area).
- Conversely, San Bruno has a lower proportion of above moderate-income residents. San Bruno ranks 103 out of 109 jurisdictions, which means most Bay Area jurisdictions have a larger proportion of above moderate-income residents than San Bruno (25% of San Bruno residents are above moderate-income).

4. SITE INVENTORY ANALYSIS FINDINGS: INCOME

The majority of the City's proposed RHNA sites are in areas with moderate incomes (between \$87,500 and \$125,000). Almost all the sites are situated in census tracts that reflect San Mateo County's median income of \$116,200 in 2022. Figure 4-5 shows almost all the proposed sites are situated in census tracts where the median income is between \$87,100 (the state median income) and \$125,000. There are three sites located in census tracts where the median income is greater than \$125,000 and just one site located in a census tract where the median income is lower than the state median.

The proposed site distribution will not exacerbate income segregation in San Bruno because:

- Placement of the RHNA sites in moderate income neighborhoods throughout the city is expected to lead to further opportunity, by providing additional housing options that are accessible to residents of various income levels and locations throughout the city.
- Most San Bruno housing units (1,910 units) are in a census tract that has a similar proportion of low-income residents (45%) as the city-wide rate of 44%. It is important to note that most San Bruno's units are close or adjacent to Census Tract 6041.04, which is predominantly low-income. These 1,910 units (including approximately 669 lower income units and 346 moderate income units) will serve neighborhoods that both reflect the city's overall moderate-income levels and are also close to lower-income neighborhoods.
- San Bruno also has four sites located in census tracts with higher income levels which will provide additional opportunities for housing in higher income neighborhoods. The site inventory includes a potential to develop 86 lower income units and 56 moderate income units in these higher income neighborhoods. Additional lower and moderate-income capacity in higher resource areas is expected through infill and ADU production. Providing more affordable housing options in areas of higher opportunity can help provide access to opportunity to lower income residents and help reverse patterns of segregation by income.
- Census Tract 6041.03, 6041.04 and 6042 are San Bruno's lowest income census tracts and are also all predominantly Hispanic. There are no concentrations of households with a disability and no concentrations of female-headed households in these areas. These areas have higher poverty rates, more environmental hazards, and concentrations of cost burdened and overcrowded households.
- There are nine sites located in census tract 6041.04 which include 437 housing units and are expected to produce 286 moderate and above moderate-income units and 154 very low- and low-income units. Providing lower-income units in this area will provide needed housing to lower-income groups that reside there.

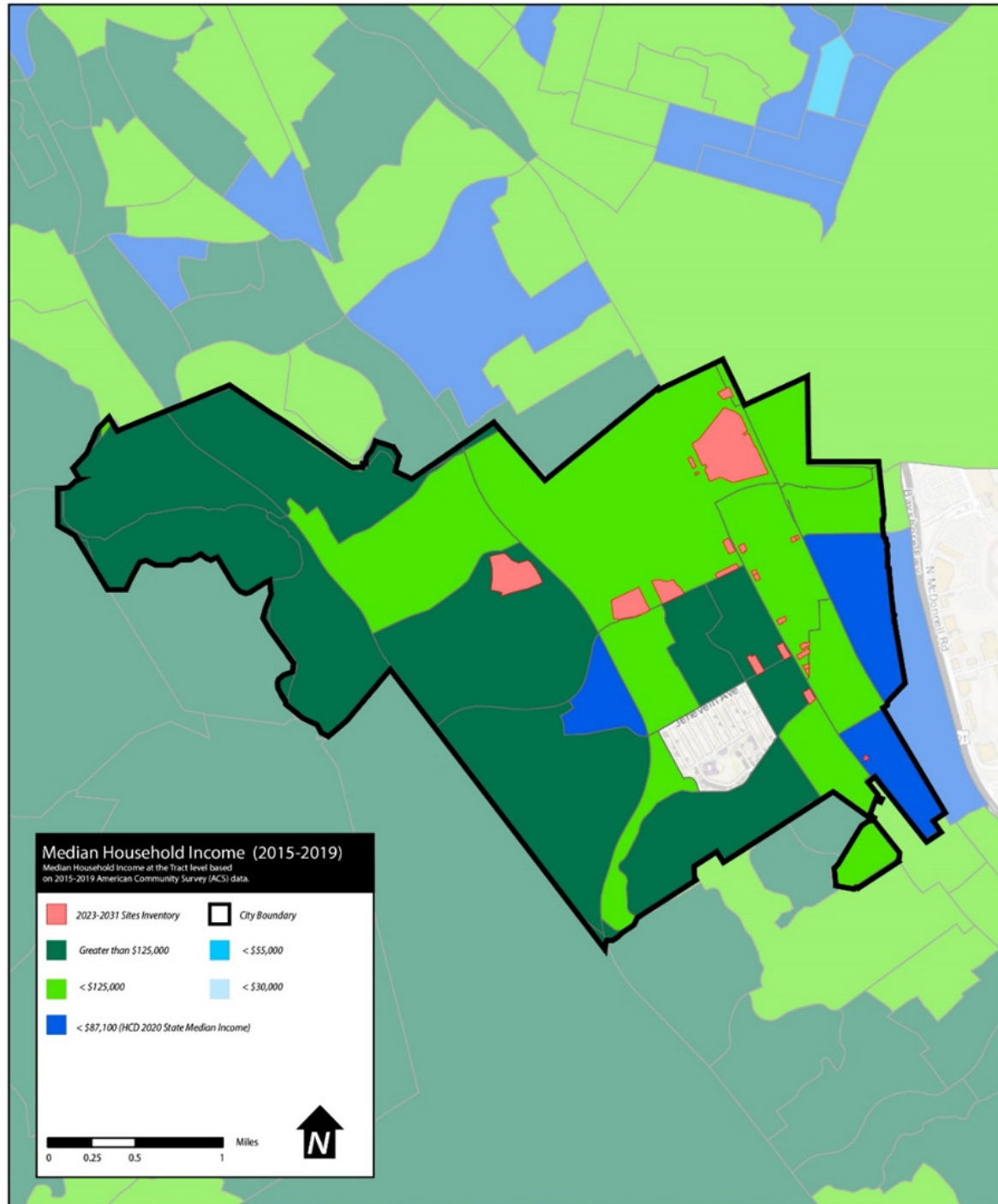


Figure 4-5 Proposed RHNA Sites in Relation to Median Income by Census Tract

Source: California Department of Housing and Community Development, AFFH Data and Mapping Resource 2022, City of San Bruno 2022.

- San Bruno's Fair Housing programs prioritize approaches that are focused on conserving and improving assets in areas of lower opportunity and concentrated poverty as well as protecting existing residents from displacement using strategies that protect residents in areas of lower or moderate opportunity and concentrated poverty and preserve housing choices and affordability.

5. INTEGRATION AND SEGREGATION: DISABILITY STATUS

HOW DOES SAN BRUNO COMPARE TO OTHER JURISDICTIONS AND SAN MATEO COUNTY

The share of the population living with at least one disability is 8% in San Bruno, same as San Mateo County (Appendix D, Figure II-13). The most common disabilities in the city are ambulatory (3.6%), independent living (3.4%), and cognitive (2.8%) (Appendix D, Figure III-18). For the population 65 and over, the share of the population with an ambulatory or independent living difficulty increases (Appendix D, Figure III-19). San Mateo County is rapidly aging and this population with a disability is likely to increase.

San Bruno is home to 326 people with developmental disabilities of whom 207 are adults and 119 are under age 18. This represents approximately 8% of the San Mateo County population of people with developmental disabilities. San Bruno's total population is about 6% of the total county population. San Bruno's neighbor, South San Francisco, has a higher prevalence of residents living with developmental disabilities, with 967 people with developmental disabilities. This represents approximately one-quarter of the San Mateo County population of people with developmental disabilities, while South San Francisco's total population is about 10% of the total county population.

Between September 2015 and June 2021, the California Department of Developmental Services reports that the number of San Mateo County residents with developmental disabilities age 62 and older grew by 33%. This is not due to migration of senior citizens with developmental disabilities to high-cost San Mateo County, but rather to well-documented gains in life span among people with developmental disabilities. With longer life expectancy, more adults with developmental disabilities will outlive their parents and family members who are the single largest source of housing for adults with developmental disabilities. Longer life spans also slow the pace of resident turnover in the county's limited supply of licensed care facilities, which further reduces opportunities for people with developmental disabilities to secure a space in a licensed care facility.

The California Department of Developmental Services reports that between September 2015 and June 2021, San Mateo County lost 5% of its supply of licensed care facilities for people with developmental disabilities (including Community Care Facilities, Intermediate Care Facilities, and Skilled Nursing Facilities), increasing the need for affordable housing options coordinated with supportive services funded by the Regional Center.

The California Department of Developmental Services has documented a 12% decline in the age group 42 to 51 and a 10% decline in the age group 52 to 61 in San Mateo County between September 2015 and June 2021. This loss can reasonably be attributed to displacement from the county because of the lack of residential living options (either licensed facilities or affordable housing) when an elderly family caregiver passes away or becomes unable to house and care for the adult. Displacement takes a particular toll on adults with developmental disabilities who depend on familiarity with transit routes and shopping and services, as well as support from community-based services and informal networks.

6. SITE INVENTORY ANALYSIS FINDINGS: DISABILITY STATUS

Almost all census tracts in San Bruno reflect the citywide percent of households with a member with a disability. There is one census tract in San Bruno that has a higher rate of population with a disability (11%) than the citywide rate (census tract 6037) in the northwest of the city located east of Skyline Boulevard and

north of Sneath Lane (Figure 4-6). While there are no opportunity sites in this census tract, there is one large site, the Engvall Site, which is expected to produce 118 units, although only 18 of these units are expected to develop at low- or moderate-income levels). There is one census tract (6040) that has a slightly higher rate of 9% of households with a disability and has one site (Walgreens) with 150 potential units in the site inventory of which 53 are expected to develop for lower incomes and 27 for moderate incomes.

Census Tract 6037, which has the only concentration of households with a disability in the city, also has a slim gap Asian majority and a neighborhood segregation typology. The predominant racial and ethnic makeup of renter households in those tracts is 4-group mixed race (Asian-Latino-Other –White Figure 4-4). Portions of Census Tract 6037 have an average household income above \$125,000, higher than some of the other areas of the city. This census tract has a concentration of cost burdened homeowners (40% to 60%) and is designated a high resource area according to TCAC opportunity maps (Figure 4-14). Some portions of this census tract have no access to public transportation, and this area is the furthest away from the city's job centers. Geographic concentrations of people living with a disability may indicate the area has access to a support network, including people living with family members, services, amenities, and transportation. While not all of census tract 6037 has access to these services and resources, some are available in the southern portion of the census tract along Sneath Lane and I-280.

7. INTEGRATION AND SEGREGATION: FAMILIAL STATUS

HOW DOES SAN BRUNO COMPARE TO OTHER JURISDICTIONS AND SAN MATEO COUNTY

Familial status can indicate specific housing needs and preferences. A larger number of nonfamily or single person households indicates a higher share of seniors living alone, young adults living alone or with roommates, and unmarried partners. Higher shares of nonfamily households indicate an increased need for one- and two-bedroom units. In San Bruno, over 70% of married couple households and a slim majority of residents living alone live in owner occupied housing (Appendix D, Figure II-19). The number of housing units available by number of bedrooms and tenure is generally consistent with the familial status of the households that live in San Bruno (Appendix D, Figure II-16 and Figure II-20).

Compared to the county, San Bruno has a slightly smaller proportion of family households and greater proportion of single person households—which is reflected in the number of bedrooms and tenure of the housing stock in the city (Appendix D, Figure II-19, and Figure II-20). The largest proportion of households is Married-couple Family Households at 53% of the total, while Female-Headed Family Households (who live with and support other family members) make up 10% of all households. The distribution of households by family type are mapped at the census tract level in Appendix D Figures 21, 22, 23, and 24.

Households headed by one person are often at greater risk of housing insecurity, particularly female-headed households who may be supporting children or a family with only one income. Gender inequality may result in lower wages for these households. Moreover, the added need for childcare can make finding a home that is affordable more challenging. In San Bruno, 16% of female-headed households with children fall below the poverty line, while 4% of female-headed households without children live in poverty. The most vulnerable households can be single parent female-headed households; San Bruno has 770 such households.

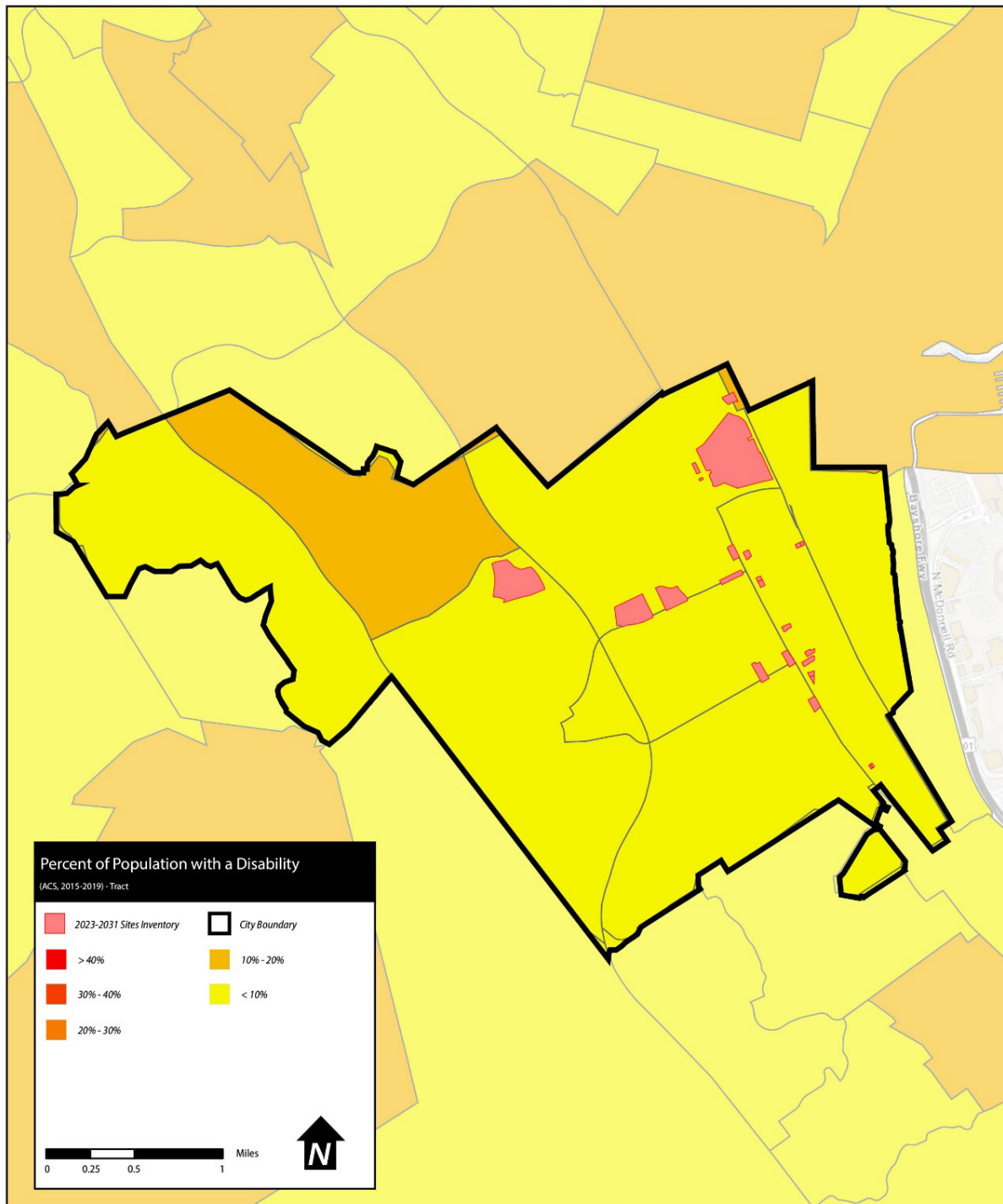


Figure 4-6 Proposed RHNA Sites in Relation to Percent of Population with a Disability by Census Tract

Source: California Department of Housing and Community Development, AFFH Data and Mapping Resource 2022, City of San Bruno 2022.

8. SITE INVENTORY ANALYSIS FINDINGS: FAMILIAL STATUS

- As shown in Figure 4-7, San Bruno has one census tract (census tract 6040) where between 20% to 40% of the households are comprised of female-headed households.
- Census tract 6040 is a predominantly White census tract with a neighborhood segregation typology, specifically the predominant racial and ethnic makeup of renter households in those tracts as “3 Group Mixed” typology—a combination of Asian, Latino, and White renters.
- Census tract 6040 has an average household income that is above \$125,000, higher than some of the other areas of the city.
- Census tract 6040 is a moderate resource area that has similar opportunities and vulnerabilities as most of the city. The area has positive environmental indicators relative to the rest of the city, adequate access to transit, and similar access to jobs and educational outcomes. There are no concentrations of cost burdened renters or homeowners, nor are there concentrations of overcrowded households and the area is not identified as being vulnerable to displacement.
- Just two of the city’s proposed RHNA sites are in this census tract. The two sites have the potential of producing 87 housing units. Census tract 6041.02 has several additional significant sites that are across the street from census tract 6040 (Bayhill Shopping Center, the AT&T Building, Traeger Avenue Office Building), totaling 735 potential housing units, of which 542 are designated for lower income households.
- In addition to San Bruno, regionally there are other jurisdictions that have at least one census tract with concentrations of female-headed households with children including South San Francisco, Daly City, and Pacifica.
- While 31% of all households in San Bruno have children, census tracts vary widely on concentrations of households with children. For example, census tract 6041.02 (where Tanforan and other significant sites are located) has a percent of households with children of 14%, well below the citywide average. This census tract also includes approximately 60% of the city’s RHNA units. On the other hand, the moderate resource census tract 6040.00 and low resource census tract 6041.04 have a much higher concentration of households with children of 41% and 34%, respectively.
- The moderate resource census tract with concentrations of households with children will be served by three opportunity sites including Walgreens (80 lower and moderate-income units), Edgemont ES (only two lower or moderate-income units) and 529 El Camino Real (42 lower and moderate-income units).
- The low resource census tract with concentrations of households with children will be served by nine opportunity sites that will include 233 lower and moderate-income units.
- These neighborhoods with higher concentrations of households with children are also close to the 1,910 units in census tract 6041.02 (Tanforan and six other significant sites) and will provide housing at various income levels for households with children.



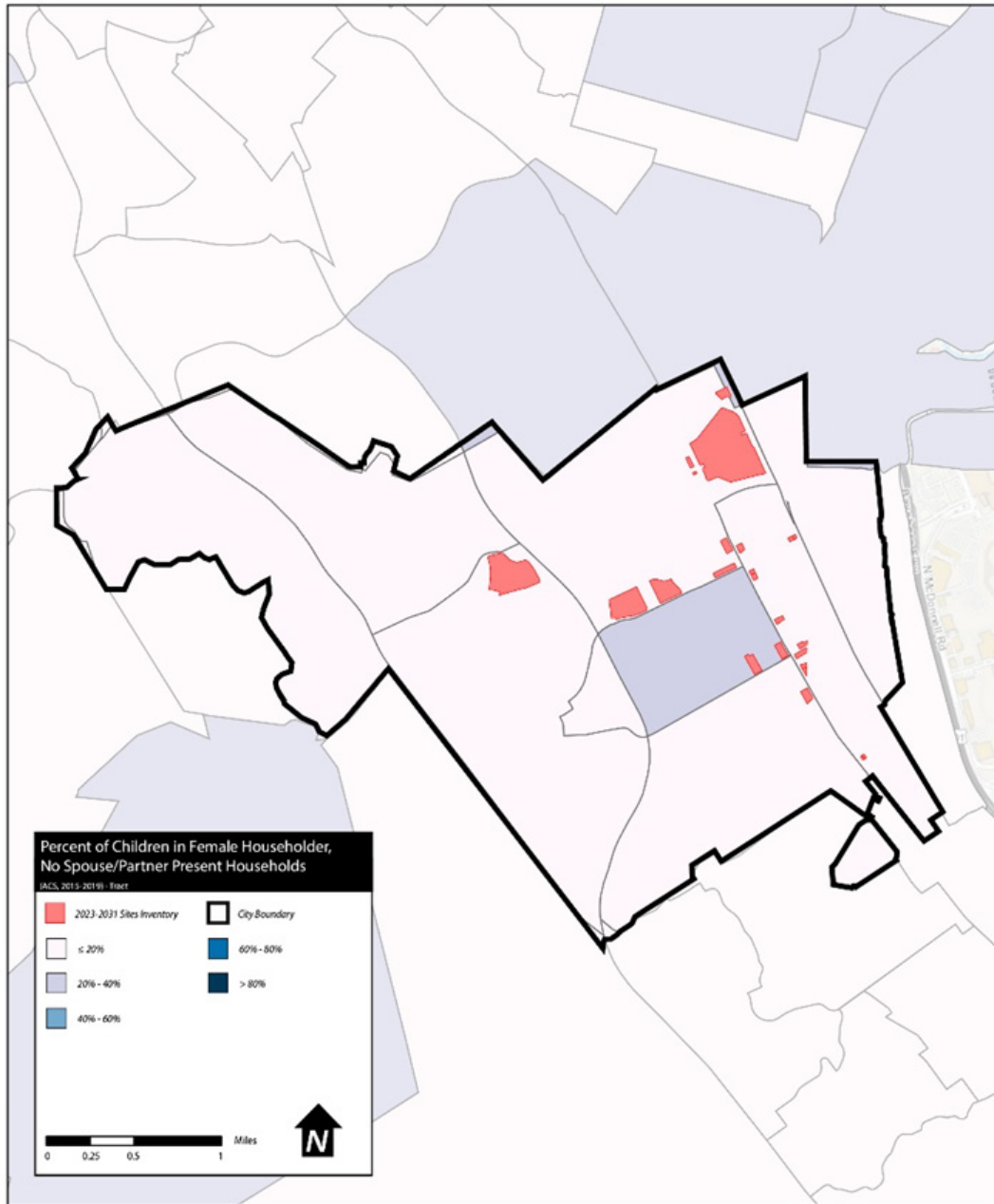


Figure 4-7 Proposed RHNA Sites in Relation to the Percentage of Female Headed Households by Tract

Source: California Department of Housing and Community Development, AFFH Data and Mapping Resource 2022, City of San Bruno 2022.

9. INTEGRATION AND SEGREGATION: ADDITIONAL ANALYSIS OF SITE INVENTORY UNITS BY CENSUS TRACT

This section summarizes the fair housing factors related to segregation and integration by census tract as well as the potential units to be developed by income level. Tables 4-1 to 4-5 include the detail on individual sites in San Bruno's site inventory by census tract including future opportunity sites which are vacant and non-vacant, totaling 2,708 future housing units. The tables include the income distribution of the expected RHNA units (very low, low, moderate, and above moderate). San Bruno will need to plan for 3,165 new units between 2023 and 2031 to comply with state law, potentially expanding the City's current housing stock of roughly 15,000 housing units by more than 20%. Of this number, 345 units are projected to be ADUs, and 670 units are Pipeline Projects and are not included in this analysis. (See Section 6.6 and 6.8 of Chapter 6 for description of ADUs and pipeline projects.)

CENSUS TRACT 6041.02

TABLE 4-1 SITE INVENTORY IN CENSUS TRACT 6041.02

Address	Site Name	Very Low-Income Units	Low-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units
1122 & 1150 El Camino Real & 1292 Huntington	Tanforan	222	128	181	469	1,000
851 Cherry Avenue Tract	Bayhill Shopping Center	47	27	38	98	210
801 - 851 Traeger Avenue	Office Building	46	26	37	96	205
840 San Bruno Avenue	AT&T Building	71	41	58	150	320
899 El Camino Real	Chili's Restaurant	22	13	18	47	100
1151 El Camino Real	San Bruno Pet Hospital	13	8	11	28	60
1101 El Camino Real	Russo Dental	3	2	3	7	15
Total		424	245	346	895	1,910

Source: City of San Bruno 2022

The largest site with the most RHNA units is the Tanforan Site, with 1,000 units (approximately 30% of San Bruno's site inventory) and is in Census Tract 6041.02. Between Tanforan and the additional 5 sites located in this Census Tract, it will include approximately 60% of San Bruno's Site Inventory— Tanforan Site, Bayhill Shopping Center, Traeger Office Building, AT&T Building, San Bruno Pet Hospital and Russo Dental, and Chili's Restaurant(1,910 units). These sites are in a relatively diverse area with a predominantly Asian population. These sites are also located in a census tract that has a similar proportion of low-income residents (45%) as the city-wide rate of 44%. Census Tract 6041.02 has three predominant racial groups (17% Hispanic, 25% White Non-Hispanic, and 49% Asian/API). The city has three predominant racial/ethnic groups, which include 27% Hispanic, 33% White, Non-Hispanic and 34% Asian/API Non-Hispanic.

It is important to note that the 1,910 units are in close to or adjacent to Census Tract 6041.04, which is predominantly low-income and Hispanic. As a result, these units will also serve lower-income Hispanic neighborhoods. These sites, which include the four largest sites in San Bruno's inventory, are expected to produce a mix of units at all income levels. The development of these sites is not expected to exacerbate concentrations of low-income residents (Table 4-1).



CENSUS TRACTS 6041.03 AND 6041.04

TABLE 4-2 SITE INVENTORY IN CENSUS TRACTS 6041.03/6041.04

Address	Site Name	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Total
475 San Mateo Avenue	Citibank	13	8	11	28	60
850 El Camino Real	Former Budget Motel	13	8	11	28	60
465 San Mateo Avenue	Bank of America	10	6	8	21	45
170 San Bruno Avenue	Vacant	9	5	8	20	42
750 El Camino Real	Melody Toyota Lot & Showroom	17	9	13	34	73
104 San Bruno Avenue	Vacant	6	3	5	12	26
590 El Camino Real	IHOP	10	6	7	19	42
426 El Camino Real	Bedroom Express	11	6	9	23	49
401 San Mateo Avenue	San Bruno Gas Station	9	5	7	19	40
117 San Juan Avenue, 116 & San Marco Avenue	Other	0	0	0	6	6
Total		98	56	79	210	443

Source: 2020 Census Data American Factfinder and Comprehensive Housing Affordability Strategy (CHAS).

Fourteen percent of San Bruno's Site Inventory is in Census Tracts 6041.04 and 6041.03 which have a predominantly Hispanic (49%) and low-income population (62%) (Table 4-2). The percent Hispanic and percent low-income is higher than the citywide averages. These sites include Citibank (60 units), former Budget Motel (60 units), Bank of America site (45 units), 170 San Bruno Vacant Lot (42 units), Melody Toyota (73 units), 104 San Bruno Ave Vacant Lot (25 units), IHOP Parking Lot (42 units), Bedroom Express (50 units), San Bruno Gas Station (40 units), and 117 San Juan Avenue and 116 San Marco Avenue (six units). Together these sites include 443 RHNA Units and are expected to produce 289 moderate and above moderate-income units and 154 very low- and low-income units. Providing lower-income units in this area will provide needed housing to lower-income groups that reside there. In addition, the sites within this census tract are adjacent or close to 669 very low-income and low-income units, 346 moderate income units, and 895 above moderate income units expected to be developed nearby on the edge of Census Tract 6041.02 (Tanforan and other large sites). The addition of a mix of lower, moderate, and above moderate-income units to a census tract that is 62% low-income will not exacerbate concentrations of low-income units in the area.

Census Tract 6041.03 and 6041.04 are two of San Bruno's lowest income census tracts which encompass a large area of the city extending from Lomita Park in the south to I-380, between El Camino Real and Huntington Ave (central part of the city which encompasses downtown). These neighborhoods are the furthest away from the Racially/Ethnically Concentrated Areas of Affluence outside of the city limits to the west. They have a neighborhood segregation typology, (specifically the predominant racial and ethnic makeup of renter households), as "4 Group Mixed" typology—a combination of Asian, Latino, Other and White renters. Households in this area earn between \$87,700 and \$125,000 which reflects the median income for the city and county (census tracts 6041.03 and 6041.04). This area is adjacent to the eastern most households in the city (census tract 6042) which is the lowest income area and has an average household income of less than \$87,700. There are no concentrations of households with disabilities and no concentrations of female headed households with children in this area. However, these census tracts have higher poverty, more environmental hazards, and concentrations of cost burdened and overcrowded households.

10. CENSUS TRACTS 6038.02, 6039 AND 6040

TABLE 4-3 SITE INVENTORY IN CENSUS TRACT 6038.02

Address	Site Name	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Total
2101 Sneath Lane	Engvall MS	0	6	12	100	118

Source: City of San Bruno 2022

TABLE 4-4 SITE INVENTORY IN CENSUS TRACT 6039.00

Address	Site Name	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Total
333 El Camino Real	Walgreens	34	19	27	70	150

Source: City of San Bruno 2022

TABLE 4-5 SITE INVENTORY IN CENSUS TRACT 6040.00

Address	Site Name	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Total
500 Acacia Ave	Former Edgemont ES	0	1	1	13	15
529 El Camino Real	Car sales lot	19	7	16	30	72
Total		19	8	17	43	87

Source: City of San Bruno 2022

Census Tract 6038.02, 6039.00 and 6040.00, together contain approximately 12% of San Bruno's Site Inventory RHNA units. Census Tract 6038.02 (Table 4-3) includes one site (Engvall MS) totaling 118 units located on the northwest side of the city; the area has a relatively large Asian and White population compared to the Hispanic population and a lower percentage of low-income residents than the city. This site is expected to produce primarily above moderate-income units

Census Tract 6039.00 (Table 4-4) contains one large site expected to produce 150 units (Walgreens), located just west of the El Camino Real corridor. This Census Tract has a below average low-income population of 28% compared to the city and is majority White (45%). However, the area is still diverse with a Hispanic population of 23%, (compared to 27% citywide) and with an Asian population of 25% (compared to 34% citywide). Table 4-4 shows the site is expected to provide units priced at a mix of incomes including 80 lower and moderate-income units and 70 above moderate-income units.

Census Tract 6040.00 (Table 4-5) contains two sites totaling 87 units, Former Edgemont ES (15 units) and a Car Sales Lot (72 units), located west of El Camino Real and have a low-income population reflecting the citywide rate, and a predominantly White population (46%). The census tract does have significant proportions of Hispanic (21%) and Asian residents (25%) as well. These two predominantly White census tracts (6040.00 and 6039.00) (totaling 237RHNA units), are located on the edge of a predominantly Hispanic and Low-Income 6040.00/6039.00 and the associated units are likely to serve the lower-income population living east of El Camino Real and not the higher income neighborhoods to the west.

While census tract level data provides some insight into demographic trends, a more granular analysis would show that sites are just as likely to meet the housing needs of surrounding census tracts depending on the exact location of the actual housing development. Many of San Bruno's sites are on the edge of a large census tract and adjacent to transit corridors. For example, the AT&T building (320 Units) is in a predominantly



Asian/White census tract, but the project may serve the predominantly lower-income neighborhoods that are closer to the actual site located just across the street.

SUMMARY OF INTEGRATION AND SEGREGATION FAIR HOUSING FACTORS AND SITE INVENTORY RHNA

TABLE 4-6 FAIR HOUSING FACTORS FOR INTEGRATION AND SEGREGATION AND SITE INVENTORY BY CENSUS TRACT

Fair Housing Factor	6041.02	6041.03/04	6038.02	6039	6040	6140	6037	6042	6038.01
Low-Income	Mod	Low	High	Mod	Mod	High	High	Low	
Predominant Race	Asian	Hispanic	White	White	White	Asian	Asian	Hispanic	White
Percent HH Disability	No	No	No	No	No	No	Yes	No	No
Percent Female Headed HH	No	No	No	No	Yes	No	No	No	No
Lower-Income Units	634	154	6	53	62	0	0	0	0
Moderate-Income Units	328	79	12	27	35	0	0	0	0
Above Moderate-Income Units	848	210	100	70	90	0	0	0	0
Total Units	1,810	443	118	150	187	0	0	0	0
Percent RHNA in Census Tract	72%	13%	5%	6%	4%	0%	0%	0%	0%

Source: City of San Bruno 2022.

F. RACIALLY/ ETHNICALLY CONCENTRATED AREA OF POVERTY (R/ECAP) OR AFFLUENCE (R/ECAA)

Racially/Ethnically Concentrated Area of Poverty or R/ECAPs are neighborhoods where residents are largely people of color and also have lower incomes. State statute requires the Housing Element's Assessment of Fair Housing to analyze R/ECAPs as well as racially concentrated areas of affluence (RCAAs). In contrast to R/ECAPs, RCAAs are neighborhoods where the population is disproportionately white and affluent. The HUD poverty threshold used to qualify a census tract as a R/ECAP was three times the average census tract poverty rate countywide—or 19.1%. In addition to R/ECAPs that meet the threshold, the Housing Assessment identifies *edge* or *emerging* R/ECAPs which meet two-thirds of the HUD defined threshold for poverty—two times the average tract poverty rate for San Mateo County (12.8%). In 2019 there were two census tracts that qualified as R/ECAPs (19.1% poverty rate) in San Mateo County and 14 that qualified as edge R/ECAPs (12.8% poverty rate). *None* of the R/ECAPs or edge R/ECAPs were in San Bruno. However, there was an edge R/ECAP located just northeast of the city border in South San Francisco. South San Francisco has higher concentrations of households with disabilities, more lower income residents than San Bruno as well as higher concentrations of households that are overcrowded and cost burdened. However, South San Francisco faces some of the similar challenges as San Bruno in areas of access to opportunity such as educational outcomes, environmental hazards, social vulnerability, and risk of displacement.

HCD's definition of a Racially Concentrated Area of Affluence is “[a] census tract with a median income 1.25 times higher than in the region and a White population of 1.5 times higher than the region.” San Bruno does not have any census tracts that meet the definition of racially concentrated areas, as shown in Figure 4-8. However, there are racially concentrated areas of affluence to the west of the city in Pacifica, as well as south of San Bruno in Burlingame and Hillsborough.

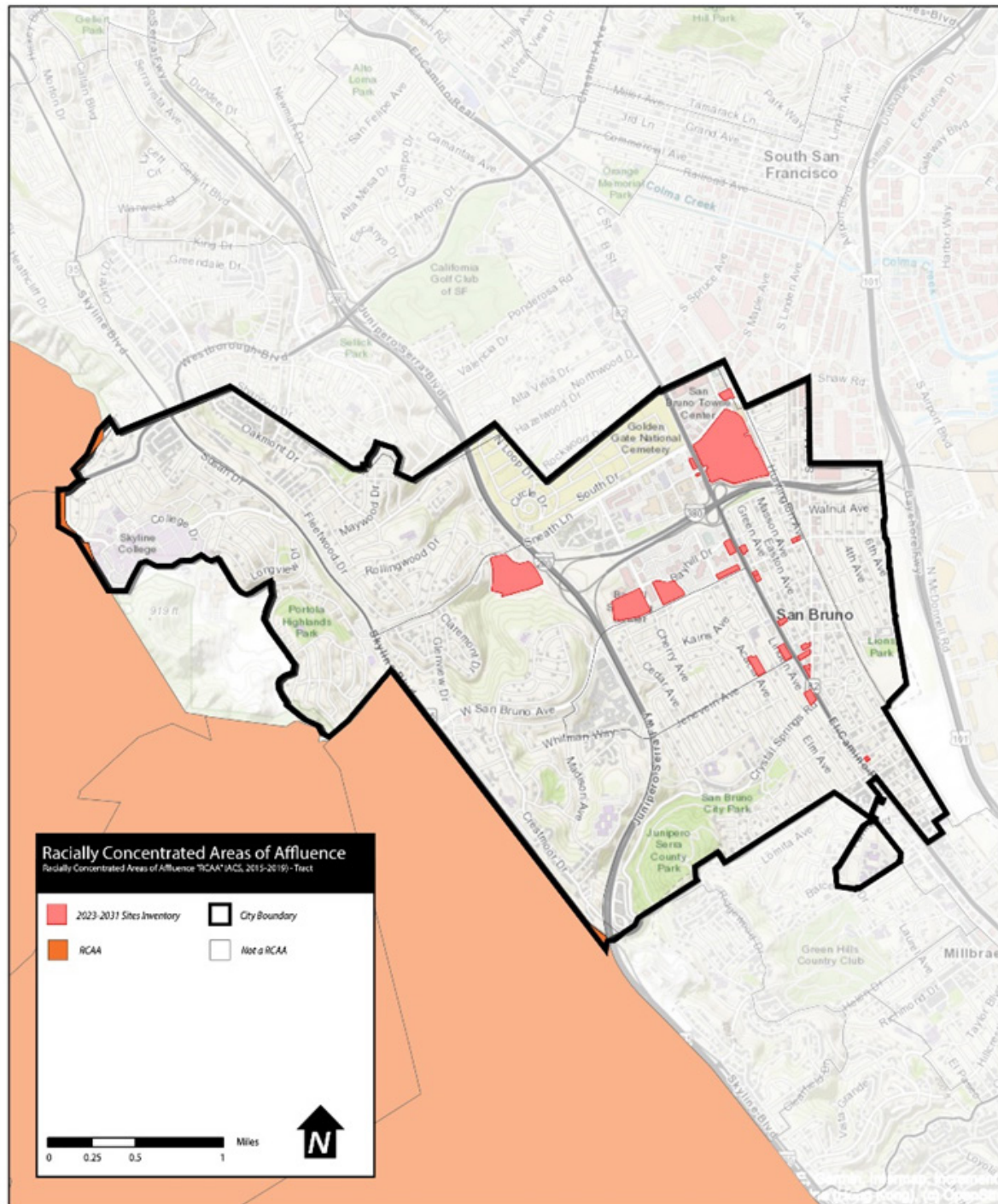


Figure 4-8 Proposed RHNA Sites in Relation to Racially Concentrated Areas of Affluence

Source: California Department of Housing and Community Development, AFFH Data and Mapping Resource 2022, City of San Bruno 2022.

HOW DOES SAN BRUNO COMPARE TO OTHER JURISDICTIONS AND SAN MATEO COUNTY

Compared to San Mateo County, the proportion of non-Hispanic White residents is six percentage points lower in San Bruno. For the areas in proximity to San Bruno with racially concentrated areas of affluence, historical local, state, and federal housing policies outlined in Appendix C contributed to these patterns in neighborhood characteristics and disparities as many policies excluded people of color from accessing the same opportunities as White residents. The R/ECAPs located to the west of San Bruno are not unique to San Bruno alone but are a pattern established throughout the entire peninsula. These census tracts to the west of peninsula cities tend to be larger and more rural and contain a significant amount of publicly protected land for parks and open space (42% of land in San Mateo County is permanently reserved for parks and open space) and an additional 20% to 30% is land at low risk of development because it is zoned for farming or other rural uses.

G. ACCESS TO OPPORTUNITY

The California Tax Credit Allocation Committee (TCAC) in collaboration with HCD developed a series of opportunity maps that help to identify areas of the community with good or poor access to opportunity for residents. These maps were developed to align funding allocations with the goal of improving outcomes for low-income residents—particularly children. The opportunity maps highlight areas of highest resource, high resource, moderate resource, moderate resource (rapidly changing), low resource and high segregation and poverty. TCAC provides opportunity maps for access to opportunity in quality education, employment, transportation, and environment. Opportunity scores are presented on a scale from zero to one. The higher the number, the more positive the outcomes. Geospatially, the area of the city east of El Camino Real is disproportionately impacted by lower education opportunity, lower economic opportunity, lower environmental scores, and high social vulnerability scores.

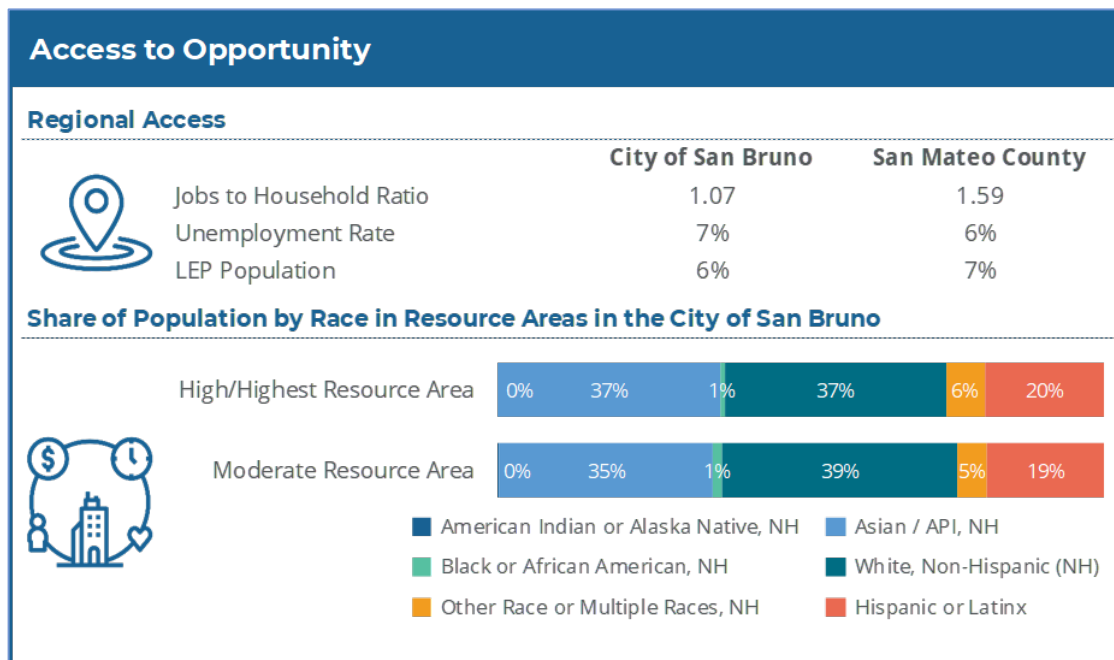


Figure 4-9 Access to Opportunity Key Facts

Source: HUD.

HOW DOES SAN BRUNO COMPARE TO OTHER JURISDICTIONS AND SAN MATEO COUNTY

TCAC's composite opportunity score for San Bruno shows census tracts west of Interstate 280 fall within high resource areas while the rest of the City's census tracts east of Interstate 280, west of El Camino Real, and south of Interstate 380 are within moderate resource areas. The tracts east of El Camino Real are designated as low resource areas (Figure 4-14). Relative to the northern portion of the county, the only census tracts considered low opportunity areas are in San Bruno and South San Francisco. Most of the census tracts in this portion of the county are considered moderate resource areas, with a handful of higher resource census tracts in San Bruno, South San Francisco, Pacifica, and Daly City.

1. ACCESS TO OPPORTUNITY: EDUCATION

TCAC's education score is based on math proficiency, reading proficiency, high school graduation rates, and the student poverty rate. According to TCAC's educational opportunity map, about half of the census tracts in San Bruno score between 0.5 and 0.75—opportunity scores are presented on a scale from zero to one and the higher the number, the more positive the outcomes (Figure 4-10). All census tracts with this score are located west of Interstate 280. Conversely, the other half of census tracts are all located east of Interstate 280 and score between 0.25 and 0.5—meaning they have lower education scores compared to the rest of the city. This area also has lower economic opportunity scores, lower environmental scores, and higher social vulnerability compared to the rest of the city.

The pattern of areas east of Interstate 280 with lower educational opportunity scores is not unique to San Bruno. Except for a couple census tracts, the entire northern part of San Mateo County—ranging from San Bruno to the south up to Daly City—also sees areas east of the Interstate with lower educational opportunity scores.

Racial and ethnic minority students in San Bruno—served by the San Mateo Union High School District and the San Bruno Park Elementary School District—experience lower educational outcomes compared to other students. Many high schoolers in the county met admission standards for a University of California (UC) or California State University (CSU) school. However, Pacific Islander, Hispanic, and Black students in the San Mateo Union district were less likely to meet the admission standards. Although San Mateo Union High School has relatively low dropout rates—4% of students—compared to other districts in the county, dropout rates among Hispanic (7%), Black (6%), and Pacific Islander students are higher (Appendix H).

2. ACCESS TO OPPORTUNITY: ECONOMIC OPPORTUNITY AND EMPLOYMENT

TCAC's economic opportunity score is comprised of poverty, adult educational attainment, employment, job proximity, and median home value. The census tracts adjacent to Interstate 280 and west of Skyline Boulevard have the best economic scores (0.5-0.75) in San Bruno (Appendix D, Figure III-7). The lowest economic opportunity scores in the city are within tracts east of El Camino Real, as well as in the central and northwestern areas of the city.

HUD's job proximity index shows that job proximity varies widely in San Bruno (Figure 4-11). On a scale from zero to 100 where 100 is the closest proximity to jobs, most of the city scores between 40 and 60. However, all census tracts west of Skyline Boulevard have scores below 40 while all tracts in the eastern portion of the city have scores above 60. Compared to the northern part of the county, San Bruno, as well as South San Francisco, have the best access to employment opportunities.



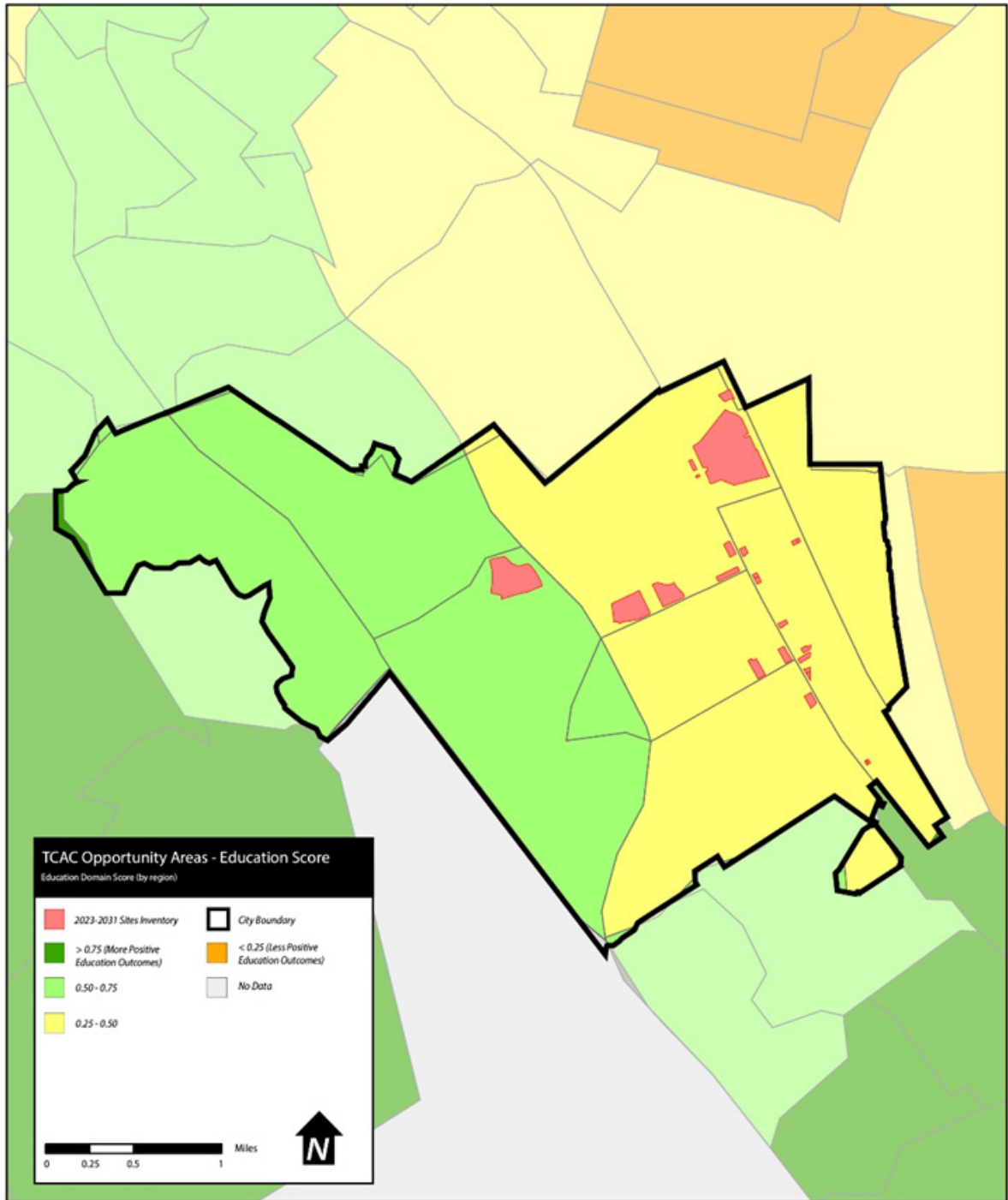


Figure 4-10 Proposed RHNA Sites in Relation to TCAC Education Opportunity by Tract

Source: California Department of Housing and Community Development, AFFH Data and Mapping Resource 2022, City of San Bruno 2022.

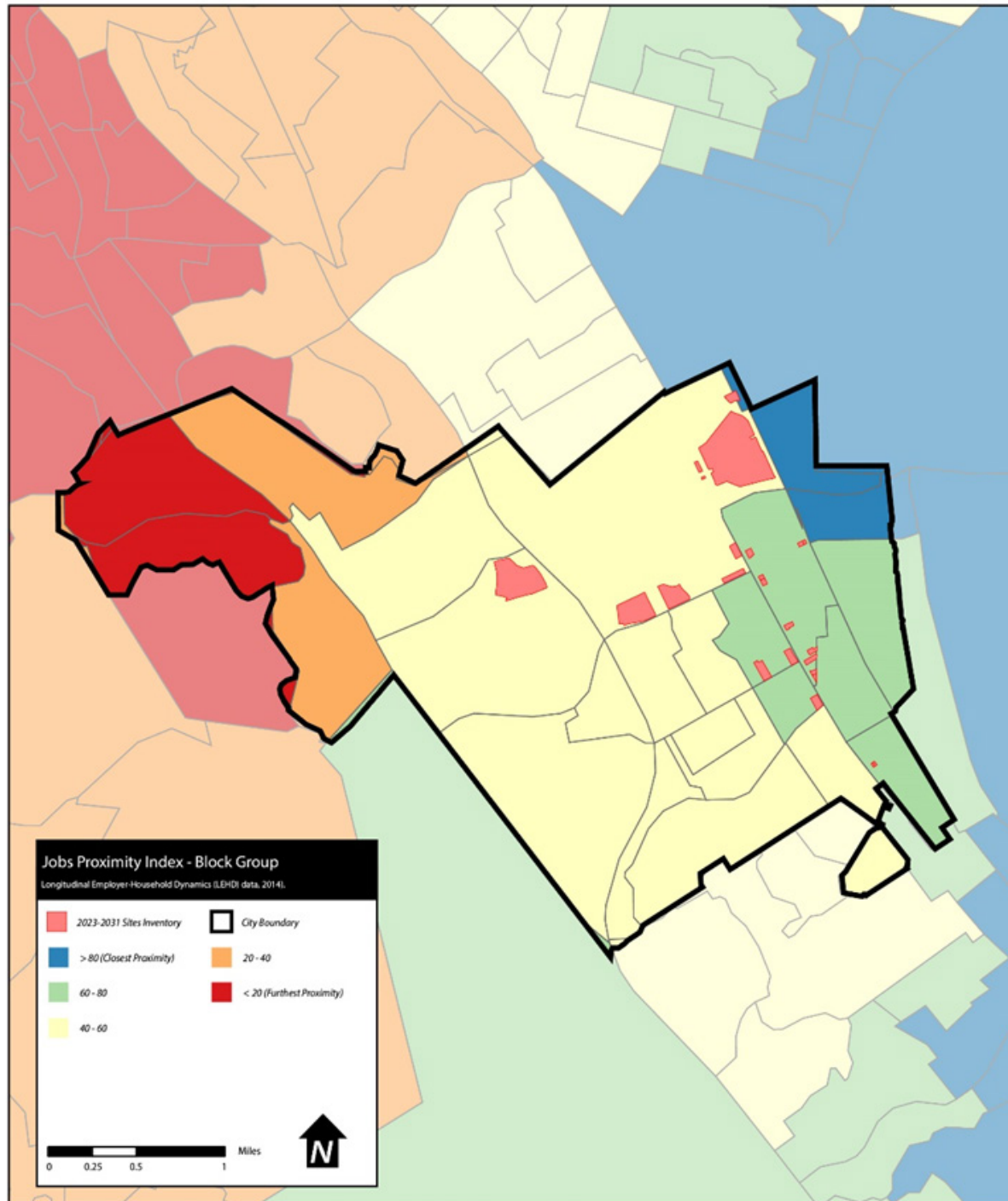


Figure 4-11 Proposed RHNA Sites in Relation to Job Proximity

Source: California Department of Housing and Community Development, AFFH Data and Mapping Resource 2022, City of San Bruno 2022.

3. ACCESS TO OPPORTUNITY: TRANSPORTATION

This section provides a summary of the transportation system that serves San Bruno and the broader region including emerging trends and data relevant to transportation access in the city. The San Mateo County Transit District acts as the administrative body for transit and transportation programs in the county including SamTrans and the Caltrain commuter rail. SamTrans provides bus services in San Mateo County, including Redi-Wheels paratransit service.

In 2018, the Metropolitan Transportation Commission (MTC), which covers the entire Bay Area, adopted a coordinated public transit and human services transportation plan. That plan—which was developed by assessing the effectiveness of how well seniors, persons with disabilities, veterans, and people with low incomes are served—was reviewed to determine gaps in services in San Bruno and the county overall.

The San Mateo County Transit District updated their Mobility Plan for Older Adults and People with Disabilities in 2018. According to the district, the county’s senior population is expected to grow more than 70% over the next 20 years and the district is experiencing unprecedented increases in paratransit ridership. The plan is targeted at developing effective mobility programs for residents with disabilities and older adults including viable alternatives to paratransit, partnerships, and leveraging funding sources.

In 2013, the San Bruno City Council adopted the San Bruno Transit Corridors Specific Plan to revitalize commercial corridors located in proximity to the San Bruno Avenue Caltrain Station.

The eastern portion of San Bruno is home to or adjacent to a significant amount of regionally significant transportation infrastructure, including Caltrain, the Union Pacific railway, and highways (U.S. 101, I-280, I-380, SR 82 and SR 35). Significant traffic along these corridors, along with production, distribution, and repair uses, may be associated with more diesel trucks, hazardous material storage, and/ or contaminated land.

As shown in Figure 4-12, all the proposed RHNA sites have access to SamTrans transit stops, with no site further than a few blocks away from a stop. Additionally, most of the proposed sites have relatively good access to the city’s Caltrain station. The sites will further access to public transportation and jobs within the city, county, and region. In addition, the area has access to transit serving the region with the San Bruno Avenue Caltrain Station serving the area.

4. ACCESS TO OPPORTUNITY: ENVIRONMENT

TCAC’s opportunity areas environmental scores are based on the CalEnviroScreen 3.0 indicators, which identify areas disproportionately vulnerable to pollution sources such as ozone, PM_{2.5}, diesel PM, pesticides, toxic release, traffic, cleanup sites, groundwater threats, hazardous waste, impaired water bodies, and solid waste sites.

Environmental outcomes vary by census tracts in San Bruno. Most census tracts have relatively positive environmental outcomes—these tracts are all located west of El Camino Real. The tracts east of El Camino Real have the lowest environmental scores in the city—primarily due to traffic on the highways, groundwater threats, and diesel particulate matter (Appendix D, Figure III-9, and Figure III-10). However, the City scores moderately well compared to other areas of San Mateo County on the California Healthy Places Index (HPI) developed by the Public Health Alliance of Southern California (PHASC) (Appendix D, Figure III-11). While most tracts score between 80% and 100%, there are tracts in the northwest, central, and eastern areas of the city that have scores between 60% and 80%, the same tracts that have low economic opportunity scores. The HPI includes 25 community characteristics in eight categories including economic, social, education, transportation, neighborhood, housing, clean environment, and healthcare.



Source: California Department of Housing and Community Development, AFFH Data and Mapping Resource 2022, City of San Bruno 2022.

5. ACCESS TO OPPORTUNITY: DISADVANTAGED COMMUNITY

San Bruno has one disadvantaged community—the tract directly east of El Camino Real and west of Huntington Avenue—which is defined under SB 535 as, “the top 25% scoring areas from CalEnviroScreen along with other areas with high amounts of pollution and low populations” (Figure 4-13). Compared to the northern portion of the county, the only other jurisdiction with census tracts designated as “disadvantaged communities” is South San Francisco.

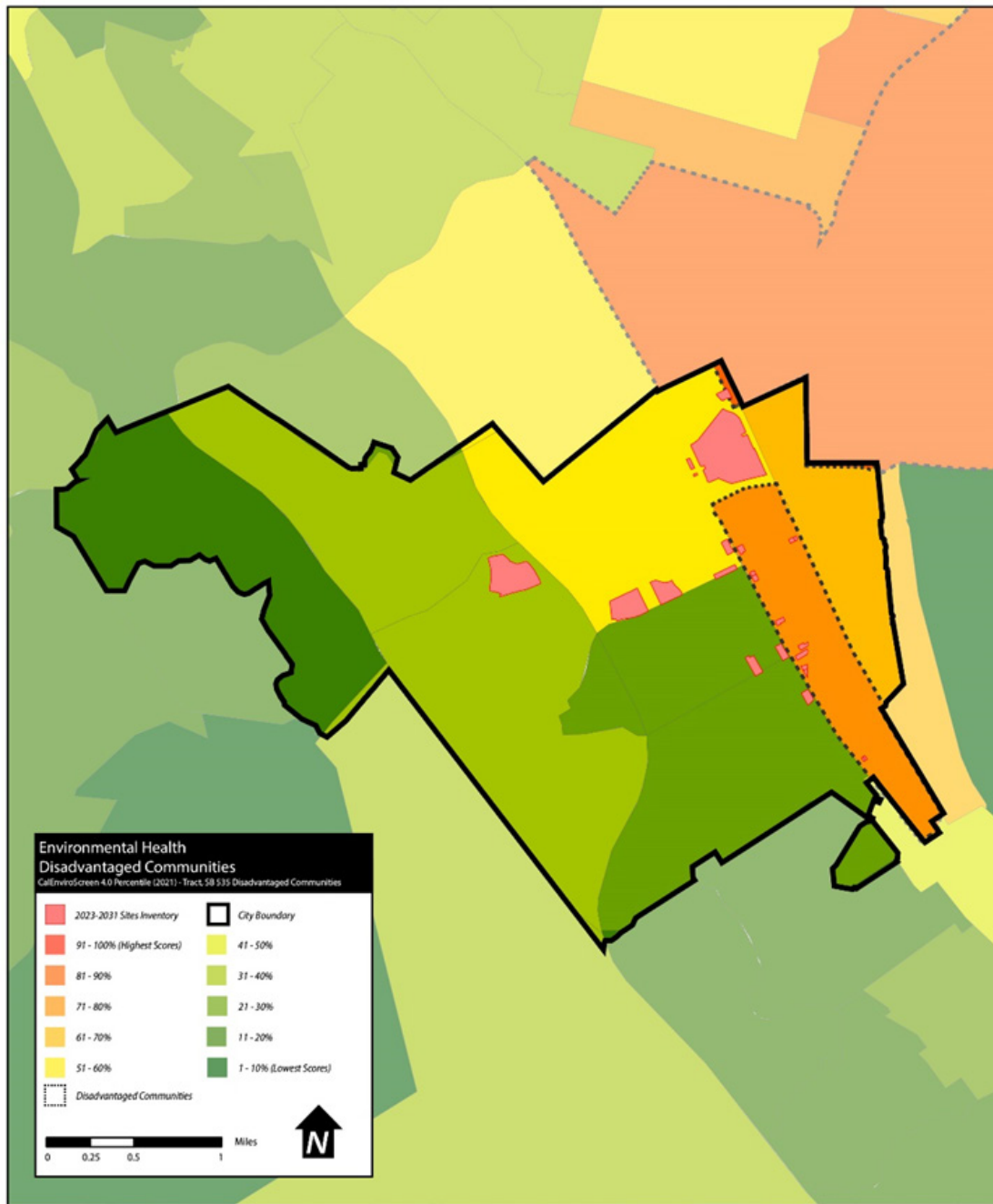


Figure 4-13 Proposed RHNA Sites in Relation to Environmental Health and Disadvantaged Communities

Source: California Department of Housing and Community Development, AFFH Data and Mapping Resource 2022, City of San Bruno 2022.

6. ACCESS TO OPPORTUNITY: SITE INVENTORY ANALYSIS FINDINGS

EDUCATION

Figure 4-10 shows where the City's proposed RHNA sites are in relation to TCAC's assessment of educational opportunity. Except for one site, all the city's proposed sites are in areas with scores between 0.25 and 0.5—indicating lower educational outcomes.

K-12 educational environments can be sensitive to new housing. An influx of residents with moderate to high resources can provide the supports needed to improve learning environments. On the other hand, concentrating affordable housing in neighborhoods with low educational opportunities can compromise economic mobility. The city's housing sites provide a mix of lower, moderate, and above moderate-income housing in some of the more diverse and accessible areas of the city (housing sites will be accessible from multiple neighborhoods throughout the city).

The City will leverage other place-based investments with the aim of improving educational outcomes in lower opportunity areas. The City intends to address low educational outcomes in the RHNA site areas to the extent possible through agreements with developers to include features in new developments that can help facilitate early and K-12 learning. For larger scale redevelopments, this could include reserving/offering reduced leases in community space for nonprofits who work with kids to improve educational outcomes, which offer subsidized childcare, and which offer afterschool activities. The City is prepared to have conversations with area schools about how the City can support improving educational outcomes.

EMPLOYMENT

Figure 4-11 shows that approximately half of the proposed RHNA sites have very good access to jobs, while the other RHNA sites also have relatively good access. The western most census tracts have the furthest distance to job centers and are also the highest resource/highest income areas. The census tracts east of El Camino Real consistently have the closest proximity to jobs sites in the city. The housing developed on the sites will further resident's access to employment and economic mobility. While the area which includes census tract 6041.04 and 6040.03 east of El Camino Real is economically disadvantaged, it is also the area that has the most access to employment opportunities, access to transit, and public infrastructure investments to support high density residential development.

TRANSPORTATION

The eastern portion of San Bruno is home to or adjacent to a significant amount of regionally significant transportation infrastructure, including Caltrain, the Union Pacific railway, and highways (U.S. 101, I-280, I-380, SR 82 and SR 35). Significant traffic along these corridors, along with production, distribution, and repair uses, may be associated with more diesel trucks, hazardous material storage, and/or contaminated land. As shown in Figure 4-12, all the proposed RHNA sites have access to SamTrans transit stops, with no site further than a few blocks away from a stop. Additionally, most of the proposed sites have relatively good access to the city's Caltrain station. The sites will further access to public transportation and jobs within the city, county, and region. In 2013, the San Bruno City Council adopted the San Bruno Transit Corridors Specific Plan to revitalize commercial corridors located in proximity to the San Bruno Avenue Caltrain Station.

ENVIRONMENT AND DISADVANTAGED COMMUNITY

Environmental outcomes vary by census tracts in San Bruno. Most census tracts have relatively positive environmental outcomes—these tracts are all located west of El Camino Real. The tracts east of El Camino Real have the lowest environmental scores—primarily due to traffic on the highways, groundwater threats, and diesel particulate matter (Appendix D, Figure III-9, and Figure III-10).

The census tracts directly east of El Camino Real (6041.04 and 6041.03) are designated as an SB 535 Disadvantaged Community. As shown in Figure 4-13, several of the city’s proposed sites are located within the census tract designated as a disadvantaged community. Together these sites include 443 RHNA Units and are expected to produce 289 moderate and above moderate-income units and 154 very low- and low-income units. Providing lower-income units in this area will provide needed housing to lower-income groups that reside there. To mitigate some of the environmental challenges in the area, San Bruno has a priority fair housing action to prioritize capital improvement investments (e.g., enhance walkability, reduce pollutants) in this specific area of the city to address current environmental challenges.

COMPOSITE OPPORTUNITY SCORE

The TCAC/HCD map measures access to positive economic outcomes based on incidence of poverty, adult educational attainment, adult employment, proximity to jobs, and median home value. Almost every proposed RHNA site is located within a moderate resource area in San Bruno (Figure 4-14). Two sites cross boundaries—one in both a high/moderate resource area and the other in a moderate/low resource area. Two other proposed sites sit completely within a high resource area and low resource area, respectively.

According to HCD and TCAC’s opportunity maps, the eastern portion of the city has the highest concentration of low- to moderate-income populations who face poor opportunity outcomes. Hispanic households are primarily concentrated in the eastern portion of the city. As previously mentioned, 443 RHNA units located on 10 sites are projected to develop in this area. Many of the sites located in this area are near the Tanforan development at the intersection of El Camino Real and I-380, which include approximately 60% of San Bruno’s RHNA units.

Data show that racial and ethnic minorities are more likely to live in low resource areas compared to non-Hispanic White residents (Appendix D Figure III-12). Conversely, Non-Hispanic White residents are more likely to live in moderate and high resource areas (Appendix D, Figure III-12). The distribution of racial and ethnic minorities in moderate and high resources areas is relatively similar. Nearly 40% of the population living in high resource areas are non-Hispanic White, compared to less than 20% in low resource areas. Conversely, Hispanic and Other/Multiple race residents are more likely to live in low resource areas. On the south side of the city both east and west of Highway 280, there are census tracts with predominant White residents by a sizeable gap of more than 10% (Appendix D, Figure II-7). The southern portion of the city includes both high resource and moderate resource areas according to the TCAC/HCD map. San Bruno does not have any highest resource areas on the TCAC/HCD map.

Census Tract 6038.02 (Table 4-3) contains the only site that is in a highest resource area, Engvall MS, totaling 118 units located on the northwest side of the city. The area has a relatively large Asian and White population compared to Hispanic population and a lower percentage of low-income residents than the city. The site will include 6 low-income units, 12 moderate income units and 100 above moderate-income units.

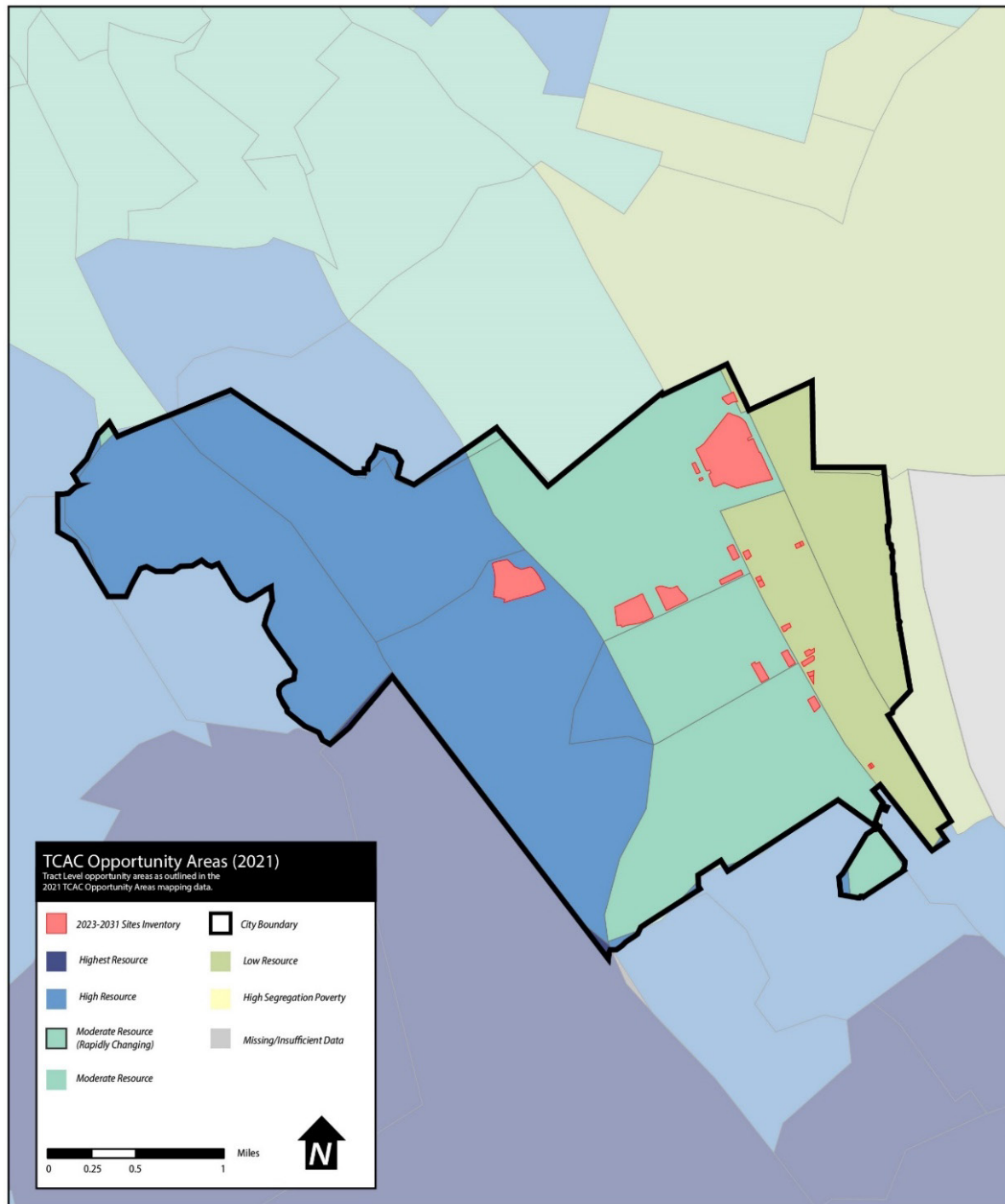


Figure 4-14 Proposed RHNA Sites in Relation to TCAC Composite Opportunity Areas

Source: California Department of Housing and Community Development, AFFH Data and Mapping Resource 2022, City of San Bruno 2022.

SUMMARY OF ACCESS TO OPPORTUNITY FAIR HOUSING FACTORS AND SITE INVENTORY RHNA

TABLE 4-7 FAIR HOUSING FACTORS FOR ACCESS TO OPPORTUNITY AND SITE INVENTORY BY CENSUS TRACT

Fair Housing Factor	6041.02	6041.03/04	6038.02	6039	6040	6140	6037	6042	6038.01	Citywide Rate
Educational Opportunity Score	Lower	Lower	Higher	Lower	Lower	Higher	Higher	Lower	Higher	N/A
Proximity to Employment	Medium	Closest	Medium	Closest	Closest	Far	Medium	Closest	Medium	N/A
Access to Transit	Medium	Closest	Medium	Closest	Closest	Far	Medium	Closest	Medium	N/A
Composite Opportunity Score	Mod	Low	High	Mod	Mod	High	High	Low	Mod	N/A
Disadvantaged Community	No	Yes	No	No	No	No	No	Yes	No	N/A
Lower Income Units	634	154	6	53	62	0	0	0	0	0
Moderate Income Units	328	79	12	27	35	0	0	0	0	0
Above Moderate-Income Units	848	210	100	70	90	0	0	0	0	0
Total Units	1,810	443	118	150	187	0	0	0	0	0
Percent RHNA in Census Tract	72%	13%	5%	6%	4%	0%	0%	0%	0%	100%

Source: City of San Bruno 2022.

H. DISPROPORTIONATE HOUSING NEEDS

Geospatially, the area of the city east of El Camino Real is disproportionately impacted with high social vulnerability scores, concentrations of cost burdened households, overcrowding, and vulnerability to displacement. In San Bruno, the easternmost census tracts in the city display concentrations (60-80% of households) of cost burdened and overcrowded households. Racial and ethnic minority populations are disproportionately impacted by poverty, low household incomes, overcrowding, and homelessness compared to the non-Hispanic White population in San Bruno.

Since 2015, the housing that has received permits to accommodate growth has largely been priced for above moderate-income households, with 66 units permitted for above moderate-income households compared to 55 permits for moderate very low households. Forty-seven permits were issued for moderate income households while no permits were issued for low-income households (Appendix D Figure IV-2). The Housing Needs Data Report for San Bruno indicates new construction has not kept pace with demand throughout the Bay Area, “resulting in longer commutes, increasing prices, and exacerbating issues of displacement and homelessness.”

The variety of housing types available in the city in 2020 are predominantly single family (60%) and medium to large scale multifamily (35%). From 2010 to 2020, the multifamily inventory increased more than single family, however, the city has a greater share of detached single-family housing compared to other communities in the region.

Over three quarters of the housing inventory in San Bruno was constructed from 1940 to 1980 (Appendix D Figure IV-3). As such, the city’s units are older, lack energy efficiency, could be costly to adapt for disability accessibility, and may have deferred maintenance if households cannot afford to make improvements.

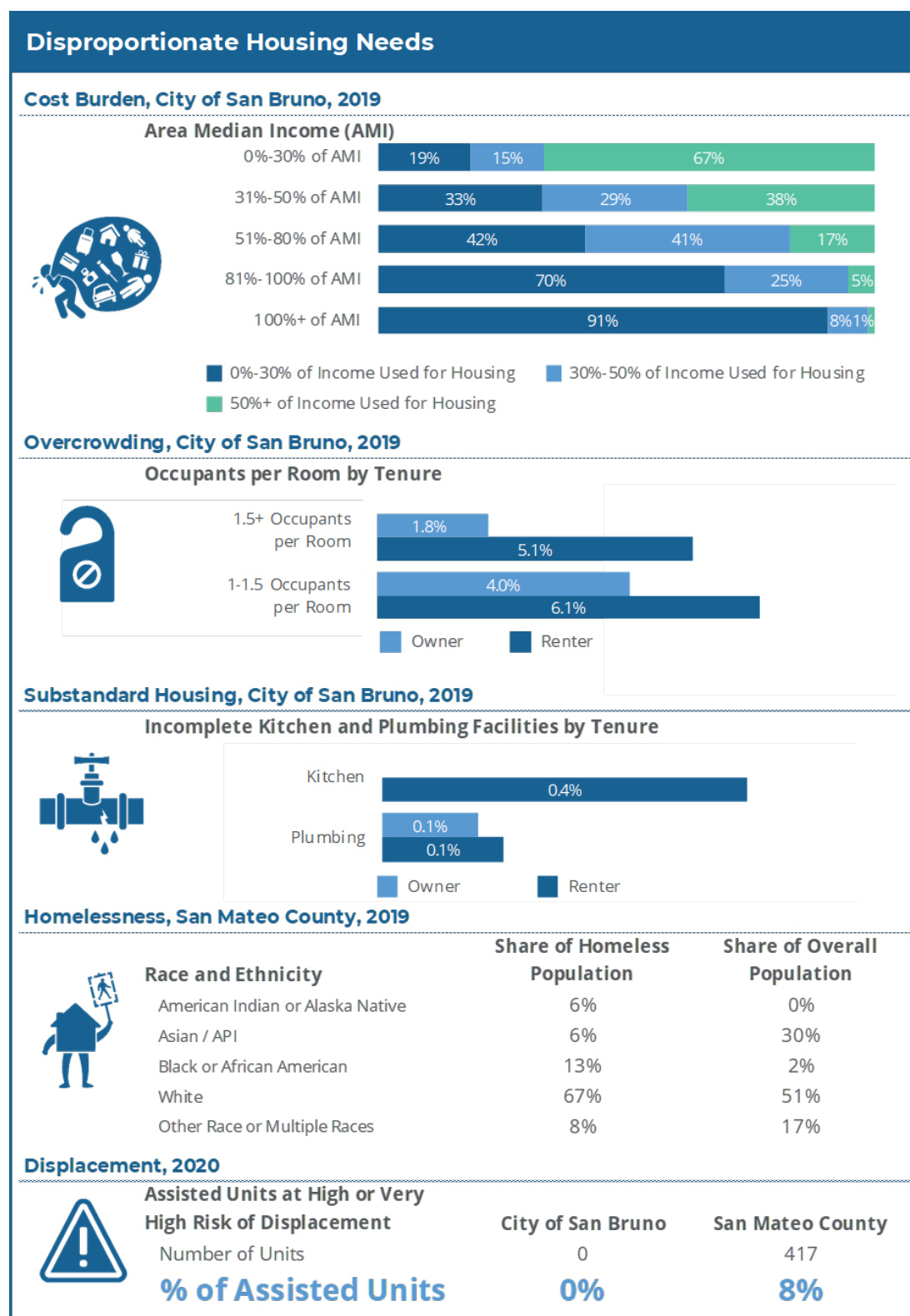


Figure 4-15 Disproportionate Housing Needs Key Facts

Source: HUD, Root Policy Research 2022.

Compared to San Mateo County, the city's owner-occupied housing market has a greater share of units priced between \$1 and \$1.5 million—32% of units in the city fall within this price range compared to 23% in the county (Appendix D Figure IV-4). Conversely, units priced above \$2 million make up a smaller proportion of the city's housing stock compared to the county with 1% and 19%, respectively. According to the Zillow home value index, home prices have experienced remarkable growth in the city and county (Appendix D Figure IV-5).

Rents have increased at a slower pace compared to the for-sale market—however, median rents increased more rapidly from 2017 to 2019 (Appendix D Figure IV-7). Rent increases have likely been dampened by the COVID-19 pandemic. Compared to the county, San Bruno has fewer luxury rental units—19% of units rent for more than \$3,000 in the city compared to 22% in the county (Appendix D Figure IV-6).

1. DISPROPORTIONATE HOUSING NEEDS: COST BURDEN AND SEVERE COST BURDEN

Cost burdened households have less money to spend on other essentials like groceries, transportation, education, healthcare, and childcare. Extremely cost burdened households are considered at risk for homelessness.

Forty-six percent of all renter households in San Bruno are cost burdened—spending more than 30% of their gross income on housing costs—and one in four are extremely cost burdened—spending more than 50% of their gross income on housing costs (Appendix D, Figure IV-9). This is nearly identical to the rates of cost burden in the county and Bay area overall, suggesting that San Bruno is providing housing at similar affordability levels as the county and region overall.

A slightly greater portion of households in San Bruno (38%) struggle with cost burden compared to the county (37%) (Appendix D, Figure IV-8). In San Bruno, most census tracts have between 40-60% of renter households experiencing cost burden, similar to other nearby jurisdictions in the northern part of the county. Relative to adjacent jurisdictions, there is a greater concentration of census tracts with cost burdened homeowners in the very northern areas of the county (Daly City, Colma, and Brisbane).

Lower income households are more likely to experience housing cost burden. Two out of every three households earning less than 30% AMI—considered extremely low-income households—are severely cost burdened, compared to only 1% of households earning more than 100% of AMI (Appendix D Figure IV-10).

There are disparities in housing cost burden in San Bruno by race and ethnicity and family size. Hispanic (53%) and Black or African American households (46%) experience the highest rates of cost burden in the city. Non-Hispanic White (32%) and Asian (33%) households experience the lowest cost burden (Appendix D, Figure IV-11).

Large family households—considered households with five or more persons—experience cost burden at a rate of 43% compared to all other households at 37% (Appendix D, Figure IV-12). Cost burdened renter households are primarily concentrated in the far west and east areas of the city (Appendix D, Figure IV-13, and Appendix D Figure IV-14).

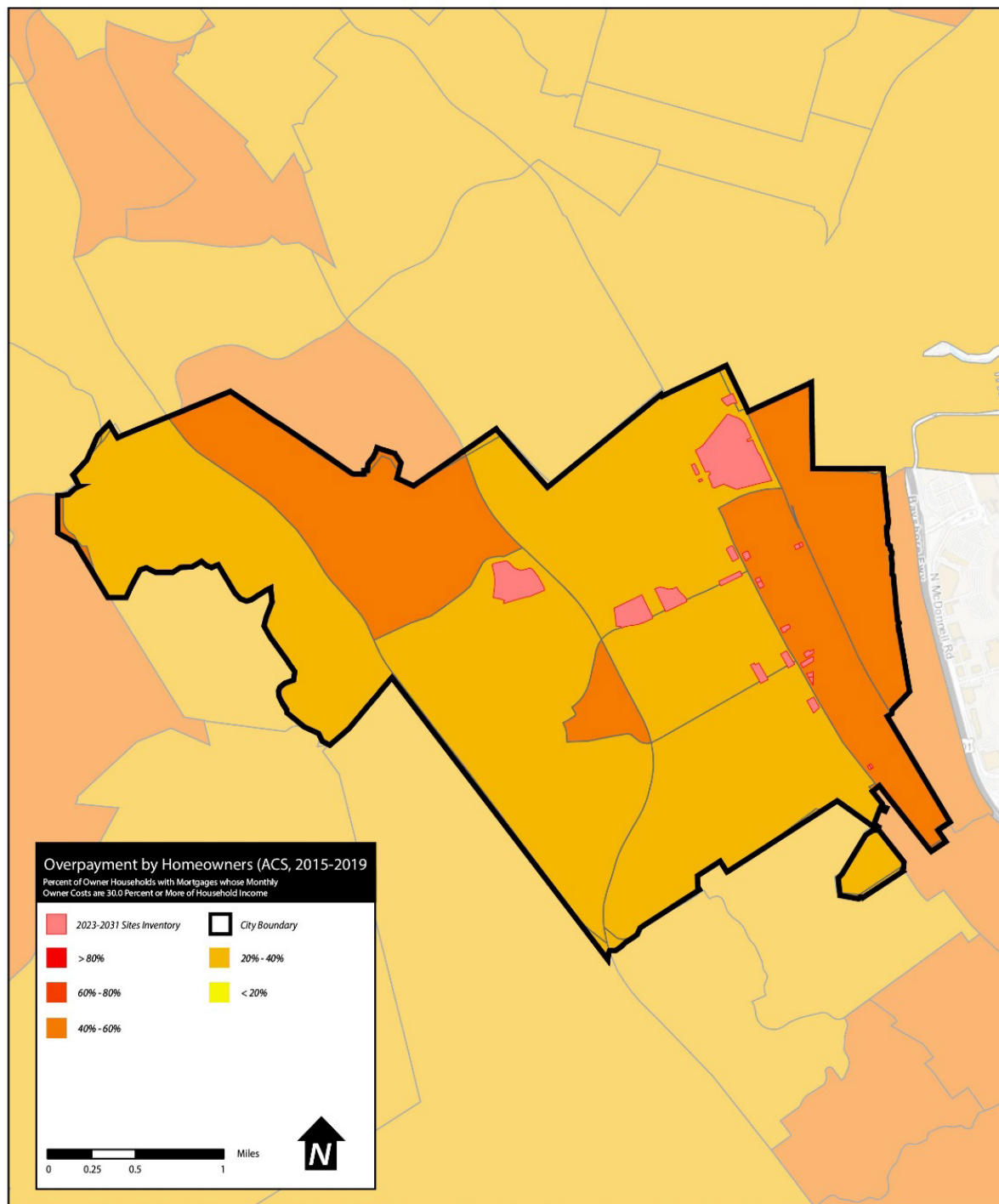


Figure 4-16 Proposed RHNA Sites in Relation to Percentage of Cost Burdened Homeowners by Tract

Source: California Department of Housing and Community Development, AFFH Data and Mapping Resource 2022, City of San Bruno 2022.

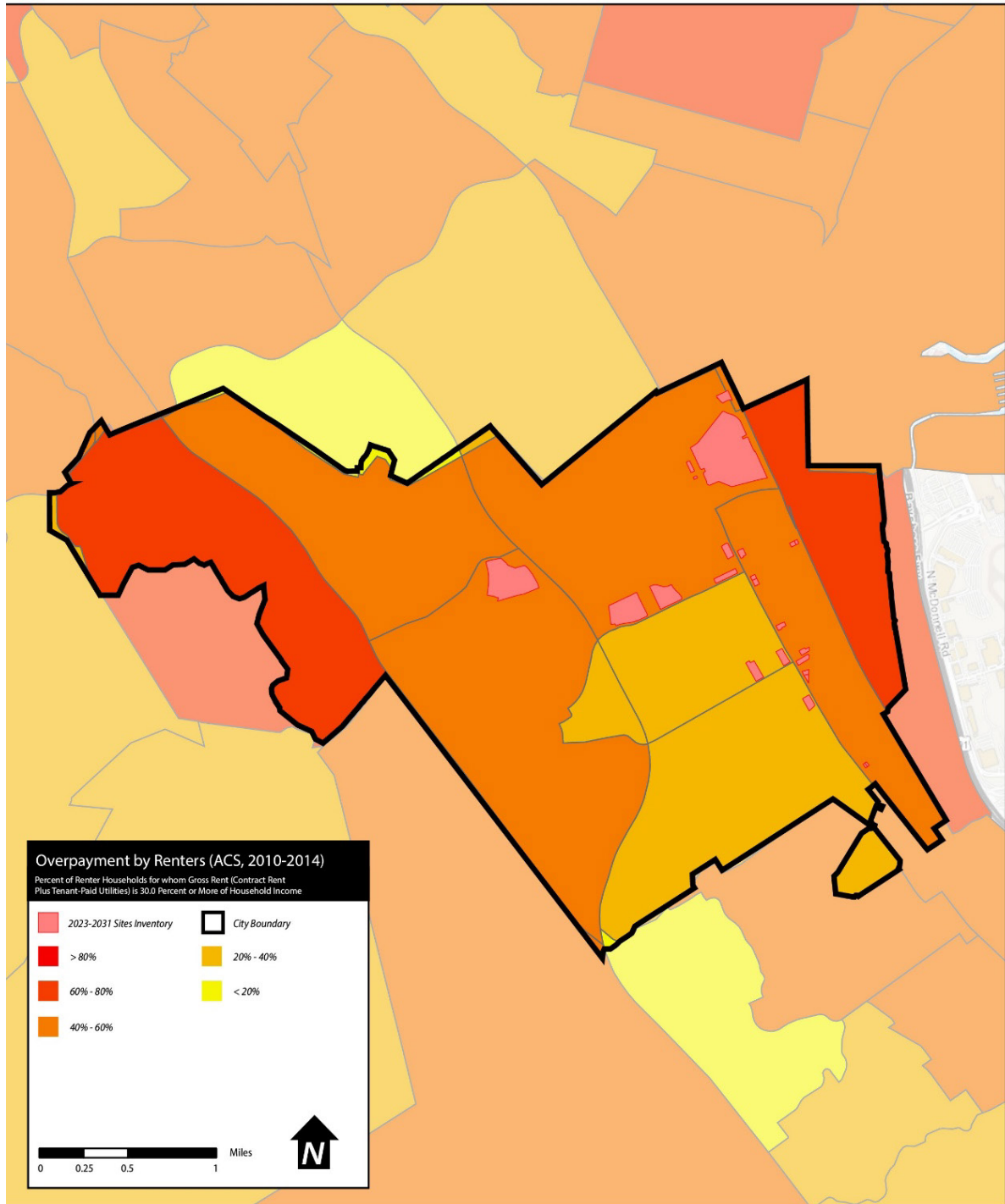


Figure 4-17 Proposed RHNA Sites in Relation to Percentage of Cost Burdened Renters by Tract

Source: California Department of Housing and Community Development, AFFH Data and Mapping Resource 2022, City of San Bruno 2022.

2. DISPROPORTIONATE HOUSING NEEDS: OVERCROWDING

The vast majority of households (92%) in San Bruno are not overcrowded—indicated by more than one occupant per room (Appendix D, Figure IV-15). However, renter households are more likely to be overcrowded with 11% of households with more than one occupant per room compared to 6% of owner households (Appendix D, Figure IV-16). Geographically, overcrowded households are concentrated north and south of Interstate 380, as well as the areas east of El Camino Real (Appendix D, Figure IV-19).

Nearly all the city’s proposed RHNA sites are in areas that experience overcrowding at a rate higher than the statewide average (Figure 4-18). San Bruno, along with Daly City and South San Francisco, are the jurisdictions in the northern part of the county that have census tracts with higher proportions of overcrowded households. New housing in these areas should alleviate overcrowding to the extent that overcrowded residents can afford to move.

3. DISPROPORTIONATE HOUSING NEEDS: SUBSTANDARD HOUSING

Data on housing condition is limited, with the most consistent data available across jurisdictions found in the American Community Survey (ACS). This captures units in substandard condition as self-reported in census surveys. In San Bruno, renter households are more likely to have substandard kitchen and plumbing facilities compared to owner households. A low share of households lack a kitchen or plumbing. For renters, 0.4% are lacking kitchen facilities while 0.1% are lacking plumbing. For owners, 0.1% are lacking plumbing facilities while no owner households lack kitchen facilities (Appendix D, Figure IV-20). The city’s code enforcement department estimates that 5% (800+ units) of the city’s housing stock primarily concentrated in the neighborhoods east of El Camino Real need rehabilitation due to poor or substandard conditions.

4. DISPROPORTIONATE HOUSING NEEDS: HOMELESSNESS

In 2019, 1,512 people were experiencing homelessness in the county during the One-Day Count, with 40% of people in emergency or transitional shelters while the remaining 60% were unsheltered. Most unsheltered people were in households without children. Most people in transitional housing were in households with children (Appendix D, Figure IV-21).

People who identify as American Indian or Alaskan Native (6% of the homeless population compared to less than 1% of the total population), Black (13%, 2%), White (67%, 51%), and Hispanic (38%, 28%) are overrepresented in the homeless population compared to their share of the general population (Appendix D, Figure IV-22 and Appendix D Figure IV-23). People struggling with chronic substance abuse (112 people), severe mental illness (305), and domestic violence (127) represented a substantial share of the homeless population in 2019 (Appendix D Figure IV-24).

5. DISPROPORTIONATE HOUSING NEEDS: DISPLACEMENT

Owner households experience a greater amount of housing stability whereas renter households are more mobile (i.e., move more frequently). Households in the city were slightly less likely to have moved in the past year compared to the households in the county (11% compared to 12% in the county) (Appendix D, Figure IV-25, and Appendix D Figure IV-26).

In San Bruno none of its income assisted rental units are at high or very high risk for displacement. San Bruno has 323 income assisted units, all designated as low risk for conversion. In San Mateo County, 417 units are at risk—8% of the total assisted housing units in the county (Appendix D, Figure IV-27).



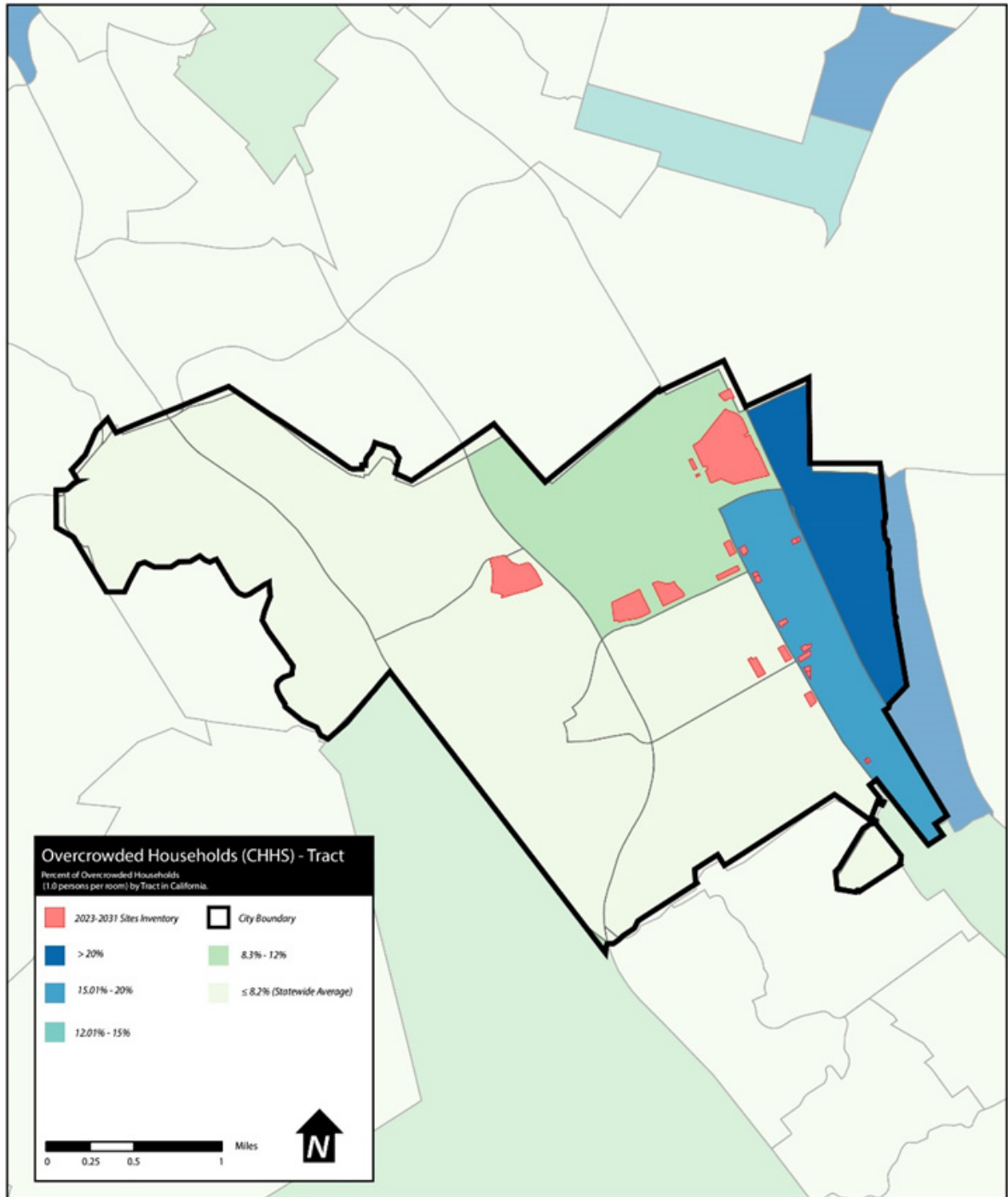


Figure 4-18 Proposed RHNA Sites in Relation to the Percentage of Overcrowded Households by Tract

Source: California Department of Housing and Community Development, AFFH Data and Mapping Resource 2022, City of San Bruno 2022.

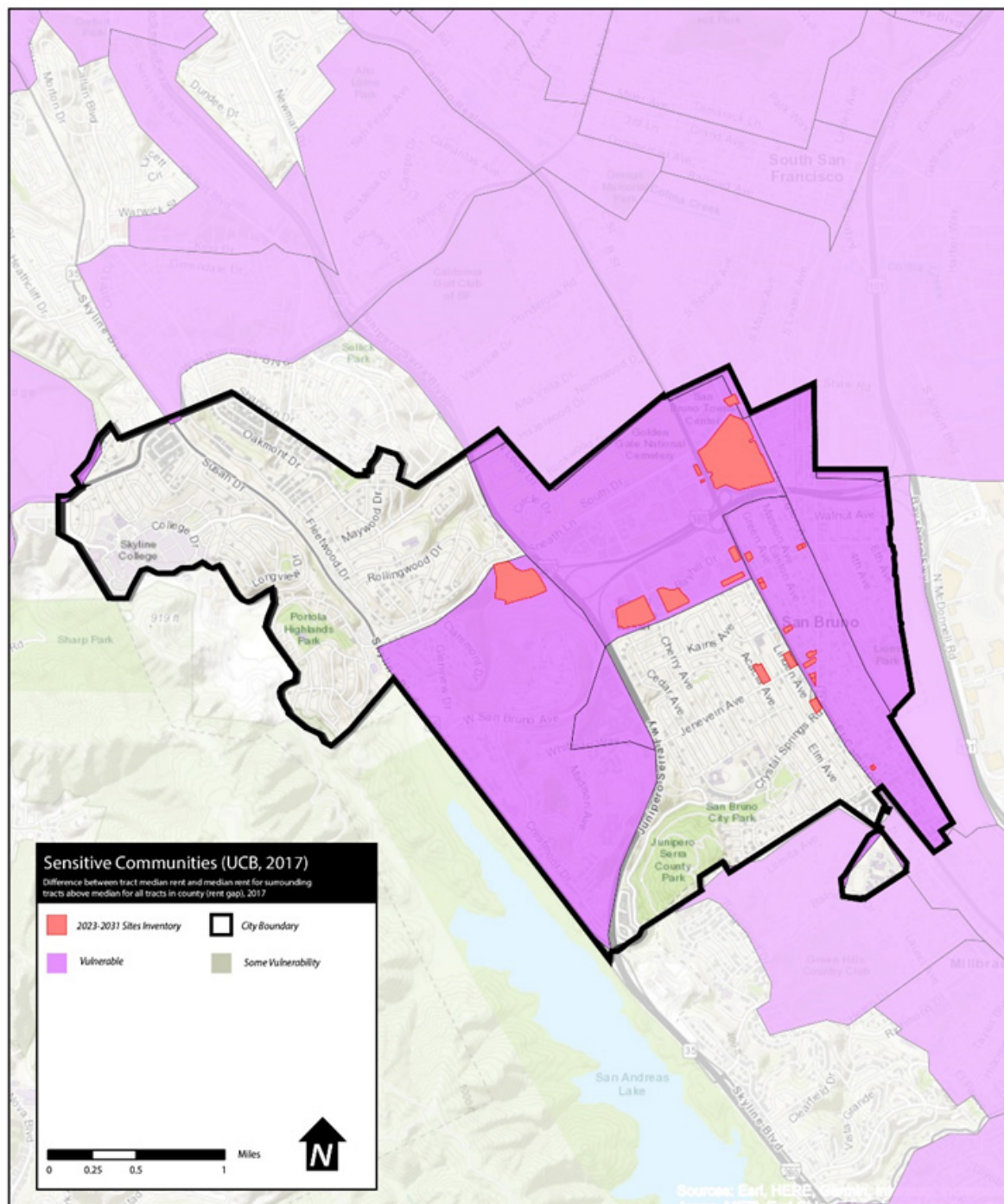


Figure 4-19 Proposed RHNA Sites in Relation to Census Tracts Vulnerable to Displacement

Source: California Department of Housing and Community Development, AFFH Data and Mapping Resource 2022, City of San Bruno 2022.

UC Berkeley’s Urban Displacement Project has mapped out “sensitive communities,” which are places where residents may be particularly vulnerable to displacement in the context of rising property values, increased redevelopment, and drastic shifts in housing costs. Using their methodology, five census tracts in San Bruno are particularly vulnerable to displacement—the majority of which have high shares of renter households (Appendix D, Figure IV-28). This vulnerability extends throughout the northern portion of the county, with almost all census tracts vulnerable to displacement. The majority of proposed RHNA sites in San Bruno are in areas vulnerable to displacement (Figure 4-19).

The Social Vulnerability Index (SVI) provided by the Centers for Disease Control and Prevention (CDC) ranks census tracts based on their ability to respond to a disaster and includes four themes of socioeconomic status, household composition, race or ethnicity, and housing and transportation. The area east of El Camino Real is most vulnerable according to the SVI (Appendix D, Figure III-15).

6. DISPROPORTIONATE HOUSING NEEDS: SITE INVENTORY ANALYSIS FINDINGS

OVERPAYMENT

Figures 4-16 and 4-17 show where the City’s proposed RHNA sites are in relation to cost burdened homeowners and renters. As shown in Figure 4-17, nearly all the City’s proposed RHNA sites are located within census tracts with concentrations of cost burdened renters (more than 40% of renter households are cost burdened). However, this reflects most census tracts in San Bruno, which have between 40-60% of renter households experiencing cost burden. There are three sites that in a census tract where there is a smaller proportion of cost burdened renters (between 20-40%). The City anticipates that adding more than 900 units of lower income housing, as shown in the site inventory, will provide housing for resident groups who are cost burdened. In addition, the programs under Goal 3 (improve the City’s management of its affordable housing portfolio, affordable housing funds, and [preserve the affordability of existing affordable housing](#)) will collectively help the City better support and monitor housing programs that serve extremely low-income residents in the city. As demonstrated in the site inventory, the City has sites located throughout the city and most of its sites will serve moderate- and low-income neighborhoods. The city’s Fair Housing programs will strive to protect existing residents from displacement by including strategies that protect residents in areas of lower or moderate opportunity and concentrated poverty and preserve housing choices and affordability.

OVERCROWDING

The most significant RHNA sites are located on census tracts with a rate of overcrowding between 8-12%. There are also several sites in a census tract with a rate of overcrowding between 15-20%, higher than most of the other census tracts in the city. More than half the city has an overcrowding rate that is less than the statewide average of 8.2%.

Racial and ethnic minorities are more likely than non-Hispanic White households to experience overcrowding. Hispanic (12% of households), Other/Multiple race (11%), and Asian households (11%) experience the highest rates of overcrowding (Appendix D Figure IV-17). While low-income households have the greatest proportion of more than 1.5 occupants per room in the city, households making between 51% and 100% AMI have the greatest proportion of households with 1 to 1.5 occupants per room (Appendix D Figure IV-18).

DISPLACEMENT

Almost all the RHNA sites are in census tracts that are vulnerable to displacement. There are only three sites located in census tracts not considered vulnerable. The City's Fair Housing Programs strive to protect existing residents from displacement by including strategies that protect residents in areas of lower or moderate opportunity and concentrated poverty and preserve housing choices and affordability. One example is to prioritize City capital improvement investments to address the challenges of the areas east of El Camino, which are disproportionately occupied by Hispanic residents. Additional affordable housing is essential to reducing displacement pressures throughout San Bruno neighborhoods. The production of more housing affordable to lower and moderate-income residents is a key component of San Bruno's housing strategy in this Housing Element. San Bruno's housing strategy includes a site inventory with more than 900 lower income units and more than 480 moderate income units, programs and policies to encourage infill and ADU production, as well as significant number of lower and moderate-income pipeline projects, which will together help counter displacement vulnerabilities throughout the city.

SUMMARY OF DISPROPORTIONATE HOUSING NEEDS FAIR HOUSING FACTORS AND SITE INVENTORY RHNA

TABLE 4-8 DISPROPORTIONATE HOUSING NEEDS FAIR HOUSING FACTORS AND SITE INVENTORY SUMMARY BY CENSUS TRACT

Fair Housing Factor	6041.02	6041.03/04	6038.02	6039	6040	6140	6037	6042	6038.01	Citywide Rate
Overpayment Renters	Yes	Yes	Yes	No	No	Yes	Yes	Yes	No	
Overpayment Homeowners	No	Yes	No	No	No	No	Yes	Yes	No	
Overcrowded	Medium	Yes	No	No	No	No	No	Yes	No	
Vulnerable to Displacement	Yes	Yes	Yes	No	No	No	No	Yes	Yes	
Lower Income Units	634	154	6	53	62	0	0	0	0	0
Moderate Income Units	328	79	12	27	35	0	0	0	0	0
Above Moderate-Income Units	848	210	100	70	90	0	0	0	0	0
Total Units	1,810	443	118	150	187	0	0	0	0	0
Percent RHNA in Census Tract	72%	13%	5%	6%	4%	0%	0%	0%	0%	100%

Source: City of San Bruno 2022.

7. SAN BRUNO'S SITE INVENTORY IMPACT ON FAIR HOUSING

San Bruno is an economically, racially, and ethnically diverse community. It has a mix of housing developments, including approximately 6,460 multi-family units, which provide housing to many lower-income and racially and ethnically diverse residents and workers in the region. San Bruno will need to plan for 3,165 new units between 2023 and 2031 to comply with state law, potentially expanding the city's current housing stock of roughly 15,000 housing units by more than 20%. Of this number, 345 units are projected to be ADUs, 670 units are pipeline projects that have been approved, and 2,708 are opportunity sites in the site inventory (See Section 6.6 and 6.8 of Chapter 6 for description of ADUs and pipeline projects). If these projects are built in a way that affirmatively furthers fair housing in San Bruno, San Bruno has an opportunity to begin to replace existing segregated living patterns with truly integrated living patterns, transform racially and ethnically concentrated areas of poverty into areas of opportunity, and address some of the challenges of residents with disproportionate housing needs.



San Bruno's physical landscape is nearly built out and there are few opportunities for large residential projects within the city's existing land inventory. As a result, most development will occur at sites that are currently developed and will undergo intensification or redevelopment. Most employment and residential growth is anticipated in the eastern portion of the city. The potential 1,000 units of housing proposed to replace the Shops at Tanforan is a key element of San Bruno's long-term housing strategy and provides the largest increase in the city. While most San Bruno's sites are in one area of the city, this area is centrally located, close to areas of the city with disproportionate housing needs and lower resources, and has access to transit to serve existing residents.

Overall, the Site Inventory in San Bruno provides housing to accommodate a mix of incomes across several distinct areas of the city. While there is a concentration of units near the Tanforan site and Bayhill Shopping Center, which is predominantly Asian and White, these sites are located just north of San Bruno's Hispanic lower-income neighborhoods. The proximity of these units will provide a mix of lower-income units that serve the lower-income neighborhoods nearby. Adding additional low-income options will not exacerbate the concentration of low-income units in the area, but create a more mixed-income neighborhood.

As demonstrated in the site inventory, new housing is dispersed throughout the city with a concentration of housing near the Tanforan site. However, these concentrations of housing density will also provide much needed housing (more than 630 lower income units and more than 325 moderate income units). San Bruno's site inventory is not anticipated to increase segregation in the city because the sites provide a much-needed mix of housing types at a mix of income levels to expand housing options for residents.

The sites inventory includes sites that are suitable for high-density residential development based on factors such as land availability, land use, transit, and infrastructure. The sites are concentrated within areas that are moderate or mixed stable neighborhoods and are in moderate resources areas. The San Bruno sites inventory includes housing developments that, combined with the Fair Housing programs and actions discussed in Chapter 7, will affirmatively further fair housing by:

- Increasing housing choice and access to housing by people within protected classes, such as race, sexual orientation, or disability.
- Promoting the development of housing units in San Bruno located in areas with access to services, infrastructure, and transit.
- Increasing access to neighborhoods of greater opportunity, greater availability of jobs that afford entry to the middle class, and convenient access to transit and service for people within protected classes.
- Promoting land-use and funding policies to encourage development of new affordable housing across the city.
- Adding resources to traditionally under-resourced neighborhood with concentrated poverty and poor housing stock.
- Improving place-based strategies to encourage community revitalization, including preservation of existing affordable housing.
- Protecting existing residents from displacement.
- Providing people with a disability affordable housing with access to services and transit.

The City anticipates that adding units of lower and moderate-income housing, as shown in the site inventory and pipeline projects, will provide housing for resident groups who are more racially and ethnically diverse than the city overall due to their disproportionate needs. The City is prepared to pair the construction of new affordable housing with city programs under Goal 4 (support the needs of households with low incomes and

special needs). Goal 8 (promote equity in housing) will ensure that residents with disproportionate needs in the region benefit from the new housing opportunities. In addition, the programs under Goal 3 (improve the city’s management of its affordable housing portfolio, affordable housing funds, and [preserve the affordability of existing affordable housing](#).) will collectively help the City better support and monitor housing programs that serve extremely low-income residents in the city. As demonstrated in the site inventory, the City proposes housing sites located throughout the city. As such, the City does not anticipate the new housing to increase segregation in the city.

I. CONTRIBUTING FACTORS

This section describes and prioritizes contributing factors and proposes implications for the policies, programs, and implementation actions included in this Housing Element that may help reverse existing patterns of segregation.

The disparities in housing choice and access to opportunity discussed above stem from historical actions, socioeconomic factors that limit employment and income growth, the inability of the broader region to respond to housing demand, regional barriers to open housing choice, and, until recently, limited resources to respond to needs.

Fair Housing Issue: Hispanic, Other/Multiple Race, American Indian or Alaskan Native, Black households, and large families have disproportionate housing needs. These needs are evident in high levels of cost burden.

Contributing factors:

- **HIGH PRIORITY:** Hispanic residents are primarily concentrated in areas east of El Camino Real. According to HCD, these areas have the highest concentration of low- to moderate-income populations and face poor opportunity outcomes according to TCAC’s opportunity maps.
- **MEDIUM PRIORITY:** There is a relative lack of affordable housing opportunities in higher resourced areas of the city.

Fair Housing Issue: Hispanic residents are concentrated in areas of the city with the lowest opportunity scores—except for employment access.

Contributing factors:

- **HIGH PRIORITY:** The Census Tract directly east of El Camino Real is designated as a SB 535 Disadvantaged Community, which is defined under SB 535 as, “the top 25% scoring areas from CalEnviroScreen along with other areas with high amounts of pollution and low populations.” Hispanic households are primarily concentrated in this portion of the city.
- **HIGH PRIORITY:** According to HCD and TCAC’s opportunity maps, this area has the highest concentration of low- to moderate-income populations who face poor opportunity outcomes. However, the area has the best access to employment opportunities.
- **MEDIUM PRIORITY:** Although affordable housing (as captured in the HCD Location Affordability Index) is not as highly concentrated in San Bruno compared to other cities throughout the county, the eastern area of the city offers the most affordable homes. As such, residents living in these areas have lower incomes and higher rates of poverty. Preference may be at play as well: A recent article in Cityscape found that Hispanic homebuyers—when controlled for demographics, loan characteristics, and finances—are more likely to purchase homes in neighborhoods with fewer non-Hispanic White homeowners and lower economic opportunity.



Fair Housing Issue: Persons with disabilities are most likely to file complaints of housing discrimination due to refusal to rent or negotiate for a rental, discriminatory terms, conditions, or privileges, and failure to make reasonable accommodations.

Contributing factors:

- **MEDIUM PRIORITY:** There were four complaints filed with HUD in San Bruno from 2017 to 2020—all on the basis of disability—where the issues cited included a failure to make reasonable accommodations. Landlords and property owners are required to provide reasonable accommodations to residents living with a disability upon request.
- **HIGH PRIORITY:** Lack of understanding of reasonable accommodation requirements by landlords and property owners.
- **HIGH PRIORITY:** Lack of knowledge about fair housing laws by landlords and property owners.

Fair Housing Issues in education:

- Students of color face disparities in subject proficiency compared to the overall student population at both San Bruno Park Elementary School District and San Mateo Union High School District. Overall, 50% of San Bruno Park Elementary District students meet or exceed English language arts and literacy standards and 41% exceed math standards. For Black or African American students, however, 39% are English language arts and literacy proficient and 23% are math proficient. For Hispanic students, 36% are English language arts and literacy proficient and 25% are math proficient.
- Overall, 70% of San Mateo Union High School District students meet or exceed English language arts and literacy standards and 50% exceed math standards. For Black or African American students, however, 55% are English language arts and literacy proficient. For Hispanic students, 50% are English language arts and literacy proficient and 22% are math proficient. For Pacific Islander students, 34% are English language arts and literacy proficient and 20% exceed mathematics testing standards.
- Hispanic and Pacific Islanders face higher rates of chronic absenteeism than the overall school population at both local school districts. Hispanic and Black or African American students have the highest dropout rates in San Mateo Union School District.
- Hispanic students face high rates of suspension compared to their representation among student bodies.

Contributing factors:

- **HIGH PRIORITY:** The reasons for these disparities are unclear and should be examined. The gaps suggest that Hispanic students need more support and that schools in the San Bruno area need to focus more closely on efforts to close proficiency gaps and ensure equity in education.

J. GOAL 4 OF THE CITY'S HOUSING ELEMENT POLICIES AND PROGRAMS: PROMOTING EQUITY IN HOUSING

As a part of San Bruno's Goal of Promoting equity in housing, protect residents from displacement, and support the needs of households with low incomes and special needs (Housing Element Goal 4, See Chapter 7), the City has identified four fair housing programs that will enhance housing mobility, remove barriers to housing in areas of opportunity, promote housing supply, choices and affordability in higher resource neighborhoods, and improve strategies to encourage community conservation and revitalization and protect existing residents from displacement.

Examples of implementing actions in the Fair Housing Programs include:

- Prioritize City capital improvement investments to address the challenges of the areas east of El Camino, which is disproportionately occupied by Hispanic residents.
- Improve landscaping and tree cover and parks, reduce pollutants, and create more walkability and pedestrian safety.
- Bolster the City's reasonable accommodations in housing by adding resources on the City website (e.g., modeling the City of San Francisco's website on service and support animals), conducting resident and property owner awareness training, and clearly defining reasonable accommodations in housing in the City code.
- Partner with local fair housing organizations to perform fair housing training for landlords and tenants, in addition to enforcing fair housing laws, with a focus on disability violations
- Engage developers to produce housing with amenities that can help to reduce the disparities in outcomes among the schools that serve San Bruno.

Programs that support fair housing and equity in housing were incorporated into this Housing Element's Goals, Policies and Programs in Chapter 7, and will help reverse patterns of racial, ethnic, and economic segregation in the city. These programs are targeted to ensure that local actions on housing will address residents with disproportionate housing needs.

KEY POINTS: AFFIRMATIVELY FURTHERING FAIR HOUSING

Resident Needs Survey

Among San Bruno residents, there were 99 survey responses. Overall, San Bruno survey data tends to mirror the countywide averages. The most frequent issues mentioned for San Bruno were related to affordability, overcrowding and quality of schools. The survey shows that in both the county and San Bruno, low-income is a barrier to accessing housing. The impacts are highest for Hispanic households.

Outreach, Enforcement, and Compliance

The City of San Bruno has few fair housing complaints and there is evidence of less exclusionary behavior from landlords in San Bruno relative to neighboring communities. No fair housing enforcement actions have been taken against the City and the City is in compliance with state fair housing laws and regulations. The City has several housing policies enacted locally that encourage housing development and mitigate displacement. The City has also identified barriers to affordable housing development and policies that can help address those barriers as well as actions to strengthen its capacity to conduct fair housing outreach and education.

Integration and Segregation

San Bruno's residents are more racially and ethnically diverse than residents in the county and the Bay Area overall because San Bruno has a higher share of residents who are Asian and Hispanic. San Bruno also has a higher proportion of lower-income residents than most Bay Area jurisdictions. The City's Fair Housing Programs in Chapter 7 will help reduce racial, ethnic, and economic segregation in the city.

Racially Concentrated Area of Poverty or an Ethnically Concentrated Area of Poverty

The City of San Bruno has no R/ECAPs or edge R/ECAPS.

Access to Opportunity

The area east of El Camino Real is disproportionately impacted by low education opportunity, low economic opportunity, low environmental scores, high social vulnerability scores, concentrations of cost burdened households, overcrowding, and low resource scores.



Disparate Housing Needs

Racial and ethnic minority populations are disproportionately impacted by poverty, low household incomes, overcrowding, and homelessness compared to the non-Hispanic White population in San Bruno. Additionally, racial, and ethnic minorities are more likely to live in moderate resources areas and be denied for a home mortgage loan.

Site Inventory Analysis

Overall, the Site Inventory in San Bruno provides housing to accommodate a mix of incomes across several distinct areas of the city. There is a concentration of units near the Tanforan site and Bayside Shopping Center, which is predominantly Asian and White. The area has a similar proportion of low-income residents as the citywide rate. The sites are also located in proximity to San Bruno's Hispanic, lower-income neighborhoods and will provide a mix of lower-income units to serve these neighborhoods. Adding additional low-income options nearby will not exacerbate the concentration of low-income units in the area and create a more mixed-income neighborhood.

The sites inventory includes sites that are suitable for high-density residential development based on factors such as land availability, land use, transit, and infrastructure. The San Bruno sites inventory includes housing developments that combined with the policies and programs in this Housing Element will AFFH.

Fair Housing Issues Contributing Factors

The City has identified four fair housing issues: 1) Hispanic and large families have disproportionate housing needs, in particular with high levels of cost burden; 2) Hispanic residents are concentrated in areas of the city with the lowest opportunity scores; 3) Persons with disabilities are most likely to experience housing discrimination based on fair housing complaints; 4) Students of color face disparities in subject proficiency, higher rates of chronic absenteeism, and higher dropout rates and rates of suspension.

Fair Housing Policies and Programs

Fair Housing Policies and Programs are included in Goal 8, "Promote Equity in Housing" (see Chapter 7). Implementing programs that support fair housing and equity in housing were incorporated into this Housing Element's Goals, Policies and Programs in Chapter 7 and will help reverse patterns of racial, ethnic, and economic segregation in the city. These programs are targeted to ensure that local actions on housing will address residents with disproportionate housing needs.

This page intentionally left blank





Section 65583 of the Government Code states that, “The local government shall make diligent effort to achieve public participation of all economic segments of the community in the development of the housing element, and the program shall describe this effort.” Meaningful community participation is also required in connection with the City’s Assessment of Fair Housing (AFH).

Another important source of guidance in the development of this Housing Element was the wider San Bruno community. As outlined in the description of public outreach that follows, the Housing Element has incorporated input from the residents at public meetings, the Planning Commission and City Council, as well as from affordable housing providers, advocates, and developers whose recommendations were received at 21 Elements Outreach Panels. A discussion of community outreach and engagement is provided below.

All the community outreach activities were advertised through the City Manager’s newsletter which has 6,030 subscribers, the Housing Element Interested Party List, and through the City’s NextDoor account which reaches over 15,000 people. The City also sent announcements through its Facebook and Instagram accounts which have 950 and 1,050 followers, respectively. The City posted public notices at City Hall and in the local paper for all City Council and Planning Commission public meetings held to discuss the Housing Element. Additionally, meetings and surveys were publicized on Channel 1, the City’s Local Origination channel, which has 9,500 viewers, and in materials distributed to downtown businesses and in residents’ utility bills which reached over 10,600 households in San Bruno.

Key accomplishments of the community outreach efforts included:

- Launch of a Housing Element Update website that included links to past event video recordings, meeting materials, outreach and survey summaries, and information about upcoming meetings and ways to get involved.
- A citywide flyer distributed in resident utility bills in April and May 2022—inviting community members to participate in community workshops, public meetings, and online surveys. The same flyer was hand distributed to downtown businesses and made available in English and in Spanish.
- Three Housing Element public workshops, three presentations/discussions at City Council, and two Planning Commission public meetings.

- The first public workshop was held on April 8, 2021 with 21 Elements and focused on educating the public on Housing Elements and the RHNA process; 264 people registered and 80 questions were answered over 3 hours.
- The second public workshop was held on May 4, 2022 and presented options for how the City could meet its RHNA obligation and solicited feedback on potential sites and programs. The meeting's white board exercise can be found in Appendix J.
- The third public workshop was held on May 26, 2022. At the meeting staff shared how input from the May 4th meeting has been integrated into the City's draft sites inventory list and draft programs and provides opportunity for review and public comment.

Below is a summary of the feedback received from the public at the May workshops.

- Expand the TCP and end single-family zoning.
- Relax setback requirements to allow use of the entire site.
- We need policies beyond the BMR ordinance to get more affordable housing.
- Consider preauthorized ADU designs to facilitate their production.
- Consider a rental registry.
- Need more outreach to renters in this process.
- Prioritize housing for teachers.
- Consider housing at Towne Center.
- Ensure units are a variety of sizes.
- The City has a difficult permitting process that needs to be simplified.
- Lower parking requirements.
- Need to educate landlords about their responsibilities.
- Consider a countywide rental registry.
- Reduce development standards to encourage development.
- Explore raising height limits in low-density residential neighborhoods.
- Support for raising building height limits along El Camino Real outside the TCP area.
- Increase density downtown.

A related Housing Element Survey was circulated by the City from March 3, 2022 to June 24, 2022 and more than 445+ responses were received. Survey flyers were in English and Spanish. Most survey respondents were longtime residents (62%) in the 50+ age group (72%), in the White, non-Hispanic ethnicity group (53%), more likely to own their home (85%) and were predominantly living in a single-family home (92%). Most expressed support for more single-family housing options with multi-family housing options (condominiums, apartments, and townhomes) their second preference. Survey respondents expressed that housing dedicated for teachers, police, fire, and related safety workers is needed in San Bruno. Survey respondents also expressed significant interest in supporting housing in the city's mixed-use and commercial areas. The summary data for the survey can be found in Appendix J.

A. CREATING AN AFFORDABLE FUTURE WEBINAR SERIES

San Bruno and 21 Elements offered a four-part countywide webinar series in the fall of 2021 to help educate community members about local housing issues. The sessions were advertised and offered in Cantonese, Mandarin, and Spanish, though participation in non-English channels was limited. All meetings and materials can be found here. The following topics, and how each intersects with regional housing challenges and opportunities, were explored:



- **Why Affordability Matters:** Why housing affordability matters to public health, community fabric, and to county residents, families, workers and employers.
- **Housing and Racial Equity:** Why and how our communities have become segregated by race, why it is a problem, and how it has become embedded in our policies and systems.
- **Housing in a Climate of Change:** What is the connection between housing policy and climate change and a walk through the Housing & Climate Readiness Toolkit.
- **Putting it All Together for a Better Future:** How design and planning for much-needed new infill housing can be an opportunity to address existing challenges in our communities.

The series included speaker presentations, audience Q&A, breakout sessions, and debrief discussions. Participants were eager to discuss and learn more about housing challenges in their community. They asked questions, commented in the chat and shared their thoughts in a post-event survey. Overall, comments were mostly positive and in favor of more housing. Some were focused on the need for new affordable housing. There was a lot of interest in seeing more housing built (especially housing that is affordable), concern about change or impact to schools, parking, quality of life, and personal struggles with finding housing that is affordable and accessible. Some participants wanted more in-depth education and discussion of next steps, while others had more basic questions.

In total, 754 registered for the series. Of those who shared, the majority identified as White (55%) or Asian (24%) and ranged between 30 and 70 years old. Over half have lived in the county for over 21 years and nearly two-thirds owned their homes.

B. OUTREACH PANELS

The 21 Elements team facilitated a series of panel discussions to solicit input from stakeholders throughout the county on housing issues. Four meetings were held, with focused stakeholder participants, including housing developers, housing advocates and funding providers, and special needs service providers.

1. FAIR HOUSING PANEL

On September 27, 2021, 21 Elements hosted the first of four Housing Element stakeholder listening sessions with organizations focused on fair housing issues.

Key themes included:

- Concern about the upcoming end of the eviction moratorium.
- The importance of transit-oriented affordable housing and stronger anti-displacement policies.
- The need for more education around accessibility regulations and reasonable accommodation.
- The ability of jurisdictions to use their platform (including jurisdiction websites) to promote education and resources for tenants and landlords.

Policies and programs suggested for consideration:

- More funding for subsidized affordable housing near transit or good access to transit.
- Stronger just cause protections.
- Rent stabilization and rent registries as a tool.
- Tenant and community first right of purchase or right of first refusal (TOPA and COPA).
- Creation of more ADUs and programs to increase access to these units for lower-income people.

Fair Housing stakeholder groups on the panel included the following:

- Center for Independence www.cidsanmateo.org
- Community Legal Services of East Palo Alto (CLSEPA) www.clsepa.org
- Housing Equality Law Project www.housingequality.org
- Legal Aid for San Mateo County www.legalaidsmc.org
- Project Sentinel www.housing.org
- Housing Choices www.housingchoices.org
- Public Interest Law Project www.pilpca.org
- Root Policy Research www.rootpolicy.com

2. HOUSING ADVOCATES PANEL

On October 18, 2021, 21 Elements hosted the second housing element stakeholder listening session with housing advocacy organizations. Five stakeholder advocacy organizations participated in the panel. Detailed information about speakers and attending jurisdictions is below and in Appendix J.

Key themes included:

- Ongoing outreach needed to underserved and diverse communities.
- Production of new housing is critical to the county's workforce.
- Greatest need for deeply affordable housing, dense infill.
- Connecting labor, environment and equity to housing.
- Rent increases are a primary concern.
- Protecting vulnerable renting populations with assistance from the government.

Policies and programs suggested for consideration:

- Additional funding for affordable housing through commercial linkage fees, inclusionary zoning, vacancy tax, sales tax, etc.
- Protections: eviction assistance, anti-harassment measures, stronger just cause, tenant right-to return, relocation assistance, improvements to the building inspection process, rental registries as a tool.
- Production: Increase density within existing communities in non-high fire severity zones, eliminating harmful restrictions on density, eliminating parking minimums, streamlining housing building process, fair and inclusive zoning policies.
- Prioritize BIPOC families in housing policies, outreach, and practice (all stages of the practices).
- Manage the threat of climate risk by adding green infrastructure.

Housing Advocates on the panel included the following:

- Housing Leadership Council www.hlcsmc.org
- Faith in Action www.faithinactionba.org
- Greenbelt Alliance www.greenbelt.org
- San Mateo County Central Labor Council www.sanmateolaborcouncil.org
- Peninsula for Everyone www.peninsulaforeveryone.org
- San Mateo County Association of Realtors www.samcar.org

3. BUILDERS AND DEVELOPERS PANEL

On September 27, 2021, 21 Elements hosted the third housing element stakeholder listening session with housing developers and builders, including both affordable housing developers and market-rate housing developers. Detailed information about speakers and attending jurisdictions is below.

Key themes for affordable housing development included:

- Primary constraints to affordable housing include: the limits of local funding, tax credit availability (the county's pool is small, limiting the size of a development that could get an award), appropriate sites.
- Key policies and programs: sufficient and flexible local funding; either public land or land that is eligible for SB 35; streamlined process and alignment across city departments.
- Local governments should be aware of state and tax credit policies/requirements; be cognizant of the cumulative impacts of multiple layers of funding requirements; be prepared for community pushback now that high-resource areas are being targeted.

Key themes for market-rate housing development included:

- Primary constraints include competition for sites (with other uses) which drives up land costs; construction costs; City process and zoning; all the "easy" sites have already been developed, leaving sites with environmental, political (close to single-family homes), or other challenges.
- Key policies and programs: Specific plans and master plans and form-based zoning have been successful; removing CEQA from the equation is helpful; seek a balance of flexibility and predictability.
- Localities should exercise caution with parking and ground-floor commercial requirements.
- Property tax exemption is likely best tool for encouraging moderate/middle income housing created by the market.
- Need for flexible parking requirements.
- Reduce entitlement processes.
- Remove CEQA from the review process.

Builders and developers on the panel included the following:

- Affirmed Housing (Affordable) www.affirmedhousing.com
- BRIDGE Housing (Affordable) www.bridgehousing.com
- The Core Companies (Affordable, Market Rate) www.thecorecompanies.com
- Eden Housing (Affordable) www.edenhousing.org
- Greystar (Market Rate) www.greystar.com
- Habitat for Humanity (Affordable) www.habitatsf.org
- HIP Housing (Affordable) www.hiphousing.org
- Mercy Housing (Affordable) www.mercyhousing.org
- MidPen Housing (Affordable) www.midpen-housing.org
- Sand Hill Property Company (Affordable, Market Rate) www.shpco.com
- Sares | Regis (Market Rate) www.srgnc.com
- Summerhill Apartment Communities (Market Rate) www.shapartments.com

4. SERVICE PROVIDERS PANEL

On November 15, 2021, 21 Elements hosted the fourth housing element stakeholder listening session with San Mateo County service providers. Detailed information about speakers (see Appendix J for organizational information) and attending jurisdictions is below.

Key themes included:

- Key location characteristics were similar for most groups: access to transit, groceries, medical services, pharmacy, schools/parks/community centers/senior centers, jobs and job training.
- Most of these stakeholder groups serve people with a range of incomes—focused primarily on the low end of the income spectrum but also into moderate levels.
- Need affordable housing (or access to vouchers/subsidies that help with access to market-rate housing) of all shapes and sizes: mostly smaller units (studios to 2BR) but there is a need for larger units. It is hard for larger families (5-8 people) to find appropriately sized housing. Space, closets and storage, design for people with disabilities.
- Some people need onsite supportive services; others just need to be able to easily access services, whether by transit or if it can come to them.
- Work with service providers and people experiencing issues firsthand before creating programs.
- Use your networks and power to encourage business/tech/philanthropy to support service providers.

Policies and programs suggested for consideration:

- Actively partner with affordable housing developers to streamline and facilitate development.
- Stabilize market rents.
- Use public land for affordable housing.
- Create more workforce housing.
- Increase inclusionary housing.
- Encourage and facilitate more homesharing.
- Educate landlords on their rights so they are more willing to partner with Housing First service providers.

Service providers on the panel included the following:

- Abode Services www.adobeservices.org
- Daly City Partnership www.dcpartnership.org
- El Concilio www.el-concillio.com
- HIP Housing www.hiphousing.org
- LifeMoves www.lifemoves.org
- Mental Health Association of San Mateo County www.mhasmc.org
- National Alliance on Mental Illness www.namisanmateo.org
- Ombudsman of San Mateo County www.ossmc.org
- Samaritan House San Mateo www.samaritanhousesanmateo.org
- Youth Leadership Institute www.yil.org



C. EQUITY ADVISORY GROUP

In partnership with 21 Elements/Let's Talk Housing and in alignment with community outreach best practices, it was important to include the guidance of and foster partnerships with community organizations to help ensure everyone's voices were heard during the Housing Element update. In response, an Equity Advisory Group (EAG) was formed consisting of 15 organizations or leaders across the county that are advancing equity and affordable housing. EAG members have facilitated and hosted community meetings in partnership with 21 Elements, collected community housing stories to put a face to housing needs, advised on messaging, and amplified events and activities to their communities. All participating organizations are featured on the Let's Talk Housing website. In May 2022, staff gave a presentation to the EAG who gave valuable feedback on draft programs and policies. The EAG provided positive feedback on San Bruno's draft policies to improve equity in housing policy and decision making. The participating organizations included the following:

- Ayudando Latines A Soñar (ALAS) www.alashmb.org
- Community Legal Services www.clsepa.org
- El Comité de Vecinos del Lado Oeste (El Comité) www.tenantstogether.org/resources/el-comité-de-vecinos-del-lado-oeste-east-palo-alto
- EPACANDO www.epacando.org
- Faith in Action www.faithinaction.org/federation/faith-in-action-bay-area/
- Housing Choices www.housingchoices.org
- Housing Leadership Council www.hlcsmc.org
- Menlo Together www.menlotogether.org
- Nuestra Casa www.nuestracasa.org
- One San Mateo www.onesanmateo.org
- Peninsula for Everyone www.peninsulaforeveryone.org
- Puente de la Costa Sur www.mypuente.org
- San Mateo County Health www.gethealthysmc.org
- Youth Leadership Institute www.yli.org/region/san-mateo
- Youth United for Community Action www.youthunited.net

D. SAN MATEO COUNTY FAIR HOUSING SURVEY

In partnership with 21 Elements/Let's Talk Housing, and conducted by Root Policy, the San Mateo County Fair Housing Survey gathered 99 responses from San Bruno residents as of April 21, 2022 (see Chapter 4, Section 4.5 for a summary of the survey findings). Key takeaways from the survey include:

- It is difficult for voucher holders to find an affordable unit.
- Low income is a barrier to finding housing.
- Single parent households and BIPOC households reported higher rates of housing denial and housing discrimination.

- Single parent households and BIPOC households reported higher rates of housing displacement.
- Students of displaced households often need to change schools and suffer worse educational outcomes as a result.
- Housing units are too small.
- Precariously housed respondents, single parent households, and households with a member experiencing a disability had issues finding housing.
- Better access to mental health care as a solution to help improve their health situations.
- San Bruno households moved to South San Francisco to find less expensive housing.
- For respondents with disabilities, housing units do not meet accessibility needs.
- Schools in the community are under resourced and result in worse educational outcomes for students.
- When asked what type of help they needed to improve their housing security, top answers included: Help me with a down payment/purchase (39%); Help me get a loan to buy a house (27%); and Help me with the housing search (23%). Other resources to improve quality of life were also identified in the survey results.

E. KEY TAKEAWAYS

Below is a summary of key takeaways that emerged throughout the outreach process.

- **Housing is personal:** People often have differing views on housing because it is a very personal issue tied to feelings of safety, belonging and identify. Often the comments reflected people's current housing situation. Those with safe, stable housing that they can afford were more concerned with change. Those without were more interested in bolder policies and more housing generally. Many people shared meaningful stories of being priced out of their communities or of their children not being able to live in the community where they grew up. Click here for a [sample](#) story.
- **The price of housing is a major concern:** Many voiced concerns about the high cost to rent or buy a home today, either for themselves, friends, or family. It is an issue that touches a lot of lives.
- **More housing is needed:** Generally, people believe we need more housing, particularly affordable housing. However, there are diverging views on how to accomplish this, where housing should go, and what it should look like.
- **Single-family neighborhoods are polarizing:** While some people voiced their interest in upzoning single-family neighborhoods or eliminating them altogether, other homeowners want to protect them and in turn, the investment they have made.
- **Affordable housing is a top concern:** Many felt that more needed to be done to promote affordable housing. They also felt that developers should be eligible for incentives and opportunities that make them more competitive.
- **The process is too complicated:** There was significant concern that the development process was too slow and there was too much uncertainty.
- **Better information resources:** People wanted to know how to find affordable housing in their communities and navigate the process of applying for it.



- **Issues are connected:** Transportation, climate change, access to living wage jobs and education opportunities are all tied to housing and quality of life. These issues are not siloed in people's lives and there is a desire to address them in interconnected ways.
- **Equity is on people's minds:** People want to talk about housing inequities and, even more so, discuss how to solve them. There was interest in ways to create new opportunities for housing and asset building for all that also address past exclusions.
- **Regional input matters but there's more to figure out:** It was valuable to build a broader sense of community and share resources at the countywide level. However, it was challenging to engage non-resident community members on jurisdiction-specific input.
- **Diversity in participation was a challenge:** Despite partnering with organizations to engage with the hardest to reach communities and providing multilingual outreach, achieving diversity in participation was challenging. In the wake of Covid-19, organizations already operating on limited resources were focused on supporting immediate needs, while the added stresses of life coupled with the digital divide added additional barriers for many.

INCORPORATING WHAT WE HEARD INTO THE PLAN

Public outreach and community engagement conducted over the past year played a significant role in the development of the goals, policies, and programs within the 2023-2031 Housing Element. The following is a summary list of topics and the associated policy(s) that were added or improved as a result of that community and stakeholder feedback.

- Support the development of larger units with more bedrooms for families.
- Improve the City's management of its affordable housing portfolio.
- Develop objective design standards to expedite the review of multi-family housing types.
- Adopt tenant anti-harassment ordinance.
- Improve awareness and availability of resources for landlords and tenants.
- Streamline the permitting process and simplify the rules and regulations for new housing development.
- Adopt rules for existing tenants first right of refusal.
- Improve walkability and access to transit in disadvantaged communities.
- Provide training/education about fair housing laws to landlords.
- Support the construction of more accessory dwelling units (ADUs).
- Provide incentives for the construction of housing that is affordable to very low- and extremely low-income households.
- Remove dwelling unit density standards in all mixed-use zoning districts.
- Establish a Below Market Rate (BMR) unit set-aside for tenants with physical or developmental needs.
- Adopt a Fair Chance Access to Housing Ordinance.
- Improve public information on the ADU application and permit process so it is clear and comprehensive.
- Provide homesharing information on the City's website.
- Give displaced residents (former jurisdiction residents) preferential access to new affordable housing.
- Revise the parking ordinance to provide more flexibility in the number of spaces provided.
- Establish a rental assistance program with the City's affordable housing funds.

- Explore increasing height limits within the El Camino Real corridor.
- Create housing in the community to meet the needs of essential workers and lower wage earners.

Appendix J includes all the community feedback, communications and documentation that support the findings and conclusions in this section. The affirmatively furthering fair housing (AFFH) resident survey is included in Appendix F for the AFFH chapter.

- a. City of San Bruno Housing Element Workshop – April 8, 2021: Survey Responses
- b. City of San Bruno Housing Policy Workshop Summaries – May 4, 2022
- c. Survey Data from the City of San Bruno Housing Element Survey which was open from March 3, 2022 to July 31, 2022
- d. 21 Elements Stakeholder Listening Sessions Summary
- e. Community Correspondence received by the city as of December 22, 2022



6 Sites Inventory and Quantified Objectives

For the 6th Cycle Housing Element, the City must identify enough potentially developable land zoned for residential use to meet the City’s new Regional Housing Needs Allocation (RHNA) capacity/production target and develop policies and programs that create opportunities to increase production. While the City does not build housing on property that is privately owned or owned by other government agencies, the State requires each jurisdiction to demonstrate where housing can reasonably be expected to be added within this cycle and how the City will facilitate and incentivize its production.

In each Housing Element cycle, the City is allocated a regional housing needs target (RHNA target) that is a share of the Bay Area region’s projected housing needs for all income groups for the next eight years. For San Bruno, the proposed RHNA is 3,165 units, a significant increase from the previous cycle which proposed 1,155 units. The total number of housing units and the distribution by income category is as follows:

TABLE 6-1 SAN BRUNO’S RHNA BY AFFORDABILITY

Income Category	Very Low (Up to 50% of AMI)	Low (51% to 80% of AMI)	Moderate (81% to 120% of AMI)	Above-Moderate Market Rate	Total
Housing Allocation	704	405	573	1,483	3,165
Housing Allocation w/15% buffer	810	466	659	1,705	3,640

Note: AMI = Area Median Income

Source: Association of Bay Area Governments (ABAG).

A. NO NET LOSS LAW

In estimating realistic capacity on sites in the Sites Inventory, California Department of Housing and Community Development (HCD) recommends jurisdictions consider the No Net Loss Law. This law was amended by Chapter 367, Statutes of 2017 (Senate Bill 166), which requires sufficient and adequate sites to be always available throughout the RHNA planning period to meet a jurisdiction’s remaining unmet housing needs for each income category. To comply with the No Net Loss Law, as jurisdictions make decisions regarding zoning and land use, or as development occurs, jurisdictions must assess their ability to accommodate new housing in each income category on the remaining sites in their housing element site

inventories. A jurisdiction must add additional sites to its inventory if land use decisions or development results in a shortfall of sufficient sites to accommodate its remaining housing need for each income category. In particular, a jurisdiction may be required to identify additional sites according to the No Net Loss Law if a jurisdiction rezones a site or if the jurisdiction approves a project at a different income level than shown in the Sites Inventory. Lower density housing development means fewer units than the capacity assumed in the site inventory.

To ensure that sufficient capacity exists in the housing element to accommodate the RHNA throughout the planning period, it is recommended the jurisdiction create a buffer in the housing element inventory of at least 15% to 30% more capacity than required, especially for capacity to accommodate the lower-income RHNA. Jurisdictions can also create a buffer by projecting site capacity at less than the maximum density to allow for some reductions in density at a project level. San Bruno has added a 15% buffer to its allocation, which brings the total RHNA including buffer of up to 3,640 dwelling units.

Table 6-2 below explains how San Bruno can meet its RHNA obligation.

TABLE 6-2 MEETING SAN BRUNO'S RHNA

Project Type	Units	RHNA Goal + 15% Buffer
Pipeline Project	670	
Accessory Dwelling Units (ADU's)	240	
Sites Inventory	2,709	3,640
Housing Units Constructed since July 1, 2022	43	
Total	3,662	

Source: City of San Bruno 2022.

B. PURPOSE OF SITES INVENTORY

This chapter is designed to address the requirements of Government Code Sections 65583(a)(3), 65583 (c)(1), and 65583.2. It describes the inventory of land in San Bruno that is suitable for residential development, including vacant sites and underutilized sites with the potential for redevelopment. This chapter also includes an analysis of the relationship of the General Plan, zoning, and public facilities and services to the site inventory as well as an assessment of realistic development capacity for the planning period. Quantified housing construction and rehabilitation objectives are identified for extremely low-, very low-, low-, moderate-, and above moderate-income households.

The purpose of the Sites Inventory is to evaluate whether there are sufficient sites with appropriate zoning to meet the City's RHNA goal. It is based on the City's current land use designations and zoning requirements. Preliminary analysis indicates the City might need to rezone or amend the P-D for the Tanforan site to permit housing. The analysis does not include the economic feasibility of specific sites, nor does it take into consideration the owner's intended use of the land now or in the future. It does not dictate where residential development will actually occur, and the decision whether or not to develop any particular site always remains with the owner of the property, not the City. Based on previous Housing Elements, the City anticipates that some of the sites on the list will be developed with new housing, some will not, and some housing will be built on sites not listed in the inventory. Although the Sites Inventory was prepared after extensive analysis, it represents the City's best estimate as to which sites are most likely to develop within the next planning cycle. The City will continue to monitor the Sites Inventory and its progress towards development over planning cycle to determine if the rate and density of development is consistent with our projections and make adjustments if necessary. The Sites Inventory is further outlined in the following tables: Table 6-3 provides a summary of housing production during Housing Element cycle 5 (2015-2023 and Table 6-4 shows housing production underway or under review. The complete Sites Inventory broken down by affordability level is included in Appendix K.



TABLE 6-3 SUMMARY OF HOUSING PRODUCTION UNDER LAST RHNA (2015-2023)

Project Name	APN	Status	Category	Units per Acre	Tenure (Renter v Owner)	Units by Household Income Category				Total Units	Assistance Programs for Each Development Deed, Restricted Units, Units Affordable without Financial or Deed Restrictions
						Very Low	Low	Moderate	Above Moderate		
1721 Earl	019041170	Built	SF		O				1	1	None
1655 Claremont	019023360	Built	SF		O				1	1	None
991 Glenview	019043530	Built	SF		O				1	1	None
2735 Concord	019023350	Built	SF		O				1	1	None
1115 Fairmont	019014310	Built	SF		O				1	1	None
1110 Glenview	019014180	Built	SF		O				1	1	None
1100 Glenview	019014170	Built	SF		O				1	1	None
1641 Claremont	019023340	Built	SF		O				1	1	None
1711 Earl	019041020	Built	SF		O				1	1	None
406-418 San Mateo Ave	020364360	Built	MF		R			41	42	83	83 apartments with market rate rents. City estimates that roughly half of the units (41 units) are affordable to moderate income households, based on market rents of comparable projects in San Bruno.
Skyline College, Multi-Family Residential	017080150	Built	MF		R		6	5	19	30	The project includes 11 deed restricted affordable units. San Mateo County Community College District has confirmed that, even though the remaining 19 units are not deed-restricted but are intended to serve the low-income level faculty families.
Skyline College, Single-Family Residential	117550010 through 11755040	Built	SF		O				40	40	As part of the Skyline College project, the district sold a portion of the property to a housing developer to finance the construction of the 30 multi-family dwelling units (MFDs). The affordable units for the project are in the MFD portion of the project.
847 Mills Ave	020112090	Built	SF		O			1		1	
164 Elm Ave	020414420	Built	SF		O			1		1	
ADUs	Various	Approved	ADU	n/a	R	21	66	21	13	121	
Total Units Created						21	72	69	124	286	
2015-2023 RHNA						358	161	205	431	1,155	
RHNA Remaining Needed for the 2015-2023 Planning Period						337	89	136	307	869	

Source: City of San Bruno, 2022.

TABLE 6-4 HOUSING PRODUCTION UNDERWAY AND APPROVAL PIPELINE FOR 2023-2031 RHNA

Project Name/Address	APN	Status	Category	Units per Acre	Tenure (Renter v Owner)	Units by Household Income Category				Units per Project	Assistance Programs for Each Development, Deed Restricted Units, Units Affordable without Financial or Deed Restrictions
						Very Low	Low	Moderate	Above Moderate		
2023-2031 RHNA						704	405	573	1,483	3,165	
Pipeline Approvals											
Mills Park	020075110, 100, 090, 080, etc.	Approved	Multi-Family	79	O	26	19	20	362	427	Project subject to a Development Agreement. The project includes 65 deed restricted affordable units.
732–740 El Camino Real	020126080, 020126160	Approved June 2022	Multi-Family	224	R	7	26	7	96	136	Vacant vehicle sales lot. SB 35 and Density Bonus project, with 29.4% deed restricted affordable units.
Glenview Terrace	019042150, 160, 170	Approved July 2022	Single-Family	9	O	0	1	3	25	29	Vacant former gas station and church properties. Developer will provide affordable units on-site and pay the affordable housing fee for a partial low-income unit, per San Bruno’s Below Market Rate (BMR) Program. The project includes four deed restricted affordable units.
111 San Bruno Ave.	021176010	Est. Approval 2023	Multi-Family	111	R	5	0	0	41	46	Vacant former bank property. Developer will provide affordable units on-site. Density Bonus requested. The project proposes seven deed restricted affordable units.
271 El Camino Real	020364320, 020364120, 020364130, 020364140	Approved Sept. 2021	Multi-Family	40	O	0	1	2	20	23	Vacant former restaurant property. Developer will provide affordable three deed restricted units on-site and pay the affordable housing fee for a partial low-income unit and partial moderate-income unit, per San Bruno’s BMR Program.
500 Sylvan Ave.	020145480	Approved	Multi-Family	53	R	0	0	0	9	9	The Affordable Housing In-lieu fee was paid for this project.
Total Units in Pipeline, by Income Category						38	47	32	553	670	
RHNA Remaining Need, by Income Category						666	358	541	931	2,495	

Source: City of San Bruno, 2022.



C. EXISTING LAND USE SUMMARY

San Bruno's gross acreage (all land uses including streets and roads) is approximately 3,600 acres. The majority (approximately 52%) of San Bruno's net land area (excluding streets and roads) is devoted to residential uses with land used for single-family residences comprising the great majority (44% of total). Commercial and industrial/auto-related land uses make up approximately 8% and 2% of San Bruno's net land area, respectively. Of these areas regional retail uses occupy the greatest. Public and quasi-public land uses make up approximately 20% of the city's net land area. The public/quasi-public uses include several non-local governmental uses, including the Golden Gate National Cemetery and Marine Reserves Center. Parks and open space make up about 13% of the city's net land area. Around 2% of the city's net land area is vacant land and surface parking lots.

1. EXISTING RESIDENTIAL AREAS

The majority of San Bruno's land area consists of residential use, and neighborhoods are its most prominent feature. The city's older, eastern half (east of I-280) contains the greatest diversity of land uses and residential types. Streets in this relatively flat area are organized in a grid pattern that reflects their early 20th century roots. San Bruno's newer, western half is comprised primarily of single-family subdivisions, but also several large multi-family complexes. The curvilinear street pattern in this area, commonly used in post-1950 residential subdivisions, is adapted to the steep, hilly terrain.

Citywide, San Bruno's average residential density is 10.6 housing units per net acre. East of El Camino Real mixed single and multi-family neighborhoods average 16.3 housing units per net acre. Single-family neighborhoods between El Camino Real and I-280 average 10.5 housing units per net acre, with the notable exception of the Crossing development, which averages 50 to 60 units per acre. West of I-280 in lower-density hillside neighborhoods residential densities average 6.7 housing units per net acre. Aside from the Crossing, the other large multi-family complexes average 29.1 housing units per net acre.

The Transit Corridors Specific Plan (TCP) provides for 1,610 new housing units in the roughly 150-acre TCP area along the city's main commercial corridors surrounding the new San Bruno Avenue Caltrain Station. The City completed the Zoning Code update to establish the mixed-use zoning standards for the area and new development standards in March 2021.

Preliminary analysis indicates the City will need to rezone or amend the P-D District for the Tanforan site to accommodate 1,000 housing units.

D. SUMMARY OF 2015-2023 HOUSING ENTITLEMENTS

San Bruno issued building permits for a total of 286 dwelling units over the current planning period through 2021 against the RHNA of 1,155 new units. This leaves a remaining obligation of 868 housing units. Furthermore, the City did not meet its allocation for housing units at any income level against the RHNA target. A majority of the approved units are attributable to Accessory Dwelling Units (ADUs), which highlights their importance in providing an additional housing type in the city. The City has entitled many more housing units over the course of the planning period which are not reflected in Table 6-3 because only building permit issuance counts towards the RHNA. Most of the delay is attributable to interruptions in the update of the Zoning Code and to an uncertain housing market during the COVID-19 pandemic.

Although the City did not meet its RHNA target, it entitled 670 additional housing units in the current planning period which are now in the pipeline for the sixth Housing Element cycle. Below is a list of major residential projects that were entitled during the current planning period but are pending building permit submittal/issuance.

All of the projects remain active and therefore are considered pipeline projects for meeting the City's RHNA-6 allocation.

111 San Bruno Avenue – The proposal is to demolish the shopping center at 761–767 Huntington Avenue and construct a five-story, mixed-use building with a total of 62 dwelling units. The project would include a total of 11 affordable units, exceeding the City's affordable housing requirements. Six low-income and five moderate-income units would be provided. Approved density is 84 units per acre. The applicant reduced the proposed number of units to 46 after negotiations to consolidate lots failed with an adjacent property owner. Staff anticipates this project will be entitled late Winter 2022/23. The project is located in the TCP area, across the street from the Caltrain Station and near a number of other potential development sites.

500 Sylvan Avenue – This TCP project proposes nine multi-family market-rate rental units in a three-story building. Dwelling unit density is 53 units per acre. The project was approved in May 2019, and the project entitlements were first extended in June 2020 and then automatically extended for 18 months pursuant to Assembly Bill 1561. Building permits for the project are ready for issuance.

Mills Park Center (601-611 and 643-799 El Camino Real; 701-751 Camino Plaza; 711-777 Kains Avenue) – The mixed-use development with 427 multi-family residential units and ground floor commercial space was approved in August 2020. The project includes a total of 64 on-site affordable units, including 26 very low-income units, 19 low-income units, and 19 moderate-income units, consistent with the City's affordable housing requirements. Building permits have yet to be submitted. Approved density is 79 units per acre. This project also represents successful parcel consolidation to maximize development within the TCP.

271 El Camino Real – The project proposes to construct a three-story, approximately 39,643 gross square-foot condominium complex that would provide three affordable housing units and 20 market-rate units (23 units total) on a 0.57-acre development site. The project was approved in September 2021 and is pending building permit submittal. The project will provide three affordable units on-site, one low-income unit and two moderate-income units and pay a partial in-lieu fee, consistent with the City's affordable housing requirements. Approved density is 40 units per acre, the maximum permitted in the zoning district.

Glenview Terrace – The project consists of 29 for-sale single-family dwelling units on the corner of San Bruno Avenue and Glenview Drive. The project site is 3.28 acres and consists of three parcels that will be merged into one parcel. The site formerly contained a gas station on San Bruno Avenue and a church on Glenview Drive. The gas station has been demolished and the church and parsonage will be demolished as part of the project. Proposed home sizes range from 1,700 to 2,600 square feet in size and all 29 homes will be constructed with attached garages. The project required a General Plan Amendment to change the general plan designation for the site from high density residential and low density residential to medium density residential, and the site was rezoned from R-1/P-D to P-D. The project includes four on-site affordable housing units, one low-income unit and three moderate-income units, consistent with the City's affordable housing requirement. Approved density is 9 units per acre. The project was approved July 2022 and is pending building permit submittal.

732–740 El Camino Real – The project was submitted pursuant to Senate Bill (SB) 35 and also requested a density bonus to construct a six-story, residential building on a 0.612-acre site with 136 rental dwelling units. Proposed density for the project is 227 units/acre with a 2.3 FAR. Twenty-nine percent of the units would be affordable, exceeding the City's affordable housing requirement of 15%. The project would provide seven very low-income units, 26 low-income units, and seven moderate-income units. The project is in the TCP area.



E. ASSISTED HOUSING SUPPLY

As described in Chapter 2, Housing Needs Assessment, San Bruno has three assisted housing developments which were completed before the third Housing Element cycle, Avalon1, completed in 2005 and Avalon2, completed in 2007 (formerly known as Meridian and Paragon and then Archstone I and II); and Village at the Crossing, also completed in 2007, all of which were built before the third Housing Element cycle. All three projects are rental apartments; the two Avalon developments (formerly named Archstone I and II) are for all household types with a total of 485 units of which 97 are affordable to very low-income households and the Village at the Crossing is for senior households only with 228 units, all of which are affordable to low-, very low-, and extremely low-income seniors. None of these assisted units are at risk of conversion during this Housing Element cycle.

F. HOUSING PRODUCTION UNDERWAY

1. ENTITLED AND UNDER CONSTRUCTION

Approximately 521 housing units are in the pipeline as of the start of this Housing Element cycle. This pipeline housing production is expected to be built within this Housing Element cycle. However, no pipeline projects are under construction. The only housing development currently under construction is Skyline College Multi-Family, consisting of 30 multi-family rental units, which is expected to receive its certificate of occupancy Fall, 2022.

Most pipeline units are expected in one project, a 427-unit mixed-use development on El Camino Real, called Mills Park, approved in July 2020. The project is also expected to accommodate a portion of the affordable housing allocation with 65 affordable units. The project is designed at 79 units to the acre which has informed the City's density assumptions for projects within the vicinity.

2. DWELLINGS CONSTRUCTED SINCE JUNE 30, 2022

Not including the housing units entitled and under construction, ten new dwellings have been constructed in the city since June 30, 2022. These units are ready for occupancy and include three detached ADUs, six attached ADUs, and one new single-family home. None of these new housing units were deed-restricted affordable units. The affordability level for the single-family dwelling is considered above market-rate. Affordability for the ADUs is based on the default ABAG affordability mix assumptions. Units constructed are indicated in Table 6-8, Total Quantified Objectives, at the end of this chapter.

G. ADDITIONAL DEVELOPMENT POTENTIAL

As described in Chapter 3, Housing Constraints, San Bruno is located in an urbanized portion of San Mateo County and has no unconstrained vacant land on which new housing can be constructed. Nonetheless, this was also true during the last Housing Element cycle and the City demonstrated that affordable housing can be built in San Bruno despite a lack of vacant land. In fact, high land costs and a limited supply of vacant land constitute conditions ripe for more intensive, compact, infill redevelopment in line with the goals of the General Plan and this Housing Element. To address the requirements of Government Code Section 65583.2(g) regarding non-vacant sites, the following section provides the supporting rationale behind the additional affordable housing development potential identified for 2023-2031, including development trends and recent and ongoing planning efforts.

1. THRIVING MARKET FOR MIXED-USE WITH RESIDENTIAL

MIXED-USE REDEVELOPMENT ANCHORS DOWNTOWN

In July 2020, the City approved entitlements for the development of a five-story mixed-use commercial and residential building on an approximately 5.38-acre site at the southwest corner San Bruno Avenue and West El Camino Real. The project involves the demolition of a number of commercial buildings, including the Mills Park Shopping Center, and construction of approximately 7,950 square feet of commercial space at the ground level, 427 residential units, and 676 covered parking spaces. The approvals included a Zoning Classification Change, Architectural Review Permit and Vesting Tentative Map, and a Development Agreement. This project is an important example of how San Bruno has consistently supported mixed-use, higher density development in the city, especially in proximity to transit.

2. PLANNING FOR HOUSING ALONG TRANSIT CORRIDORS

GENERAL PLAN GOAL AND POLICY ALIGNMENT

The identification of additional realistic future housing sites for San Bruno is based on the goals and policies in the 2025 General Plan (LUD-A, LUD-B, and LUD-C) as updated by the 2013 Transit Corridors Specific Plan, which promote, among other things:

- Residential development to increase walkability and transit use;
- Intensification of land uses around the San Bruno BART Station and planned San Bruno Avenue Caltrain Station; and
- The reuse and intensification with multi-use, transit-oriented development of El Camino Real, San Bruno Avenue, and San Mateo Avenue.

GENERAL PLAN LAND USE DESIGNATIONS

The San Bruno 2025 General Plan re-designated three major commercial corridors, El Camino Real, San Bruno Avenue and Huntington Avenue, with a TOD (Transit Oriented Development) designation to allow for a mix of commercial, office, and residential uses and capitalize on the proximity of these corridors to BART and Caltrain. The Transit Corridors Specific Plan, adopted in 2013, expanded the TOD designation to encompass the Central Business District along San Mateo Avenue. In March 2021, the City updated the Zoning Code for consistency with the General Plan and Specific Plan, thus streamlining mixed-use development within the TOD designation by making residential and residential mixed-use permitted uses in the zone. The rezoning was the final major implementation step for the TCP. The land use designations are described in detail in the Chapter 3 discussion of governmental constraints and resources. Most of the new housing opportunity sites identified in this Housing Element are located in these mixed-use transit corridors.

TCP ZONING CONSISTENCY WITH GENERAL PLAN DENSITY

The 2025 General Plan took the first big step toward accommodating the development of transit-accessible, affordable infill housing in San Bruno. The TCP does not assign a maximum density for individual residential development projects within the TCP area. Instead, the TCP identified a maximum of 1,610 units for the entire area but allows flexibility in the size of each project based on market conditions and development standards set forth in the Plan.



The TCP provides for higher density development along transit corridors—the location characteristics, proximity to transit, jobs, and shopping that make the area appealing to the changing housing preferences of groups such as seniors, millennials and workers, and market conditions have demonstrated the financial feasibility and demand for such housing projects. A number of higher density residential projects have been built, are under construction or in the approval process along the El Camino Real corridor in San Bruno.

Since the rezoning, there has been strong developer interest in investing in residential development in the TCP area. Four project applications or pre-applications have been submitted and staff has met with several interested property owners and developers about other sites. The TCP provides a guide to developers with detailed development standards and design guidelines and a Program Environmental Impact Report that will facilitate the application process and minimize additional environmental review for projects.

MIXED-USE DEVELOPMENT SITES WITH MULTIPLE LOTS

This Housing Element relies on development of mixed-use sites within the TCP area to accommodate the City's RHNA. The TCP envisions mixed-use projects to be residential above retail uses, however the Plan does allow 100% residential projects along El Camino Real and San Bruno Avenue, with the exception that key corners should be anchored with ground floor retail. Many of these development sites consist of multiple parcels and will need to be assembled. Development sites that are 20,000 square feet or greater have no limit on floor to area ratio (FAR), making it more likely that smaller sites will be consolidated under single ownership.

H. OPPORTUNITY SITES AND REALISTIC CAPACITY

1. REALISTIC DEVELOPMENT

Recent development trends suggest that San Bruno is ripe for redevelopment based on development approved and redevelopment interest in the last planning period and that housing density for the development is much higher than the City anticipated in the previous planning period. Housing densities in the city's transit corridors has ranged from a low of 53 dwelling units per acre for the 500 Sylvan Avenue project, to a high of 224 dwelling units per acre with state and local incentives for the 732–740 El Camino Real project. Because San Bruno has a minimum below market rate (BMR) requirement of 15%, many developers are choosing to exercise the city's density bonus provisions, resulting in denser housing projects than previously anticipated. The City expects this trend to continue throughout the planning period.

2. SITES

Under the land uses designated in the San Bruno 2025 General Plan and the Zoning Code, many acres of commercial land in San Bruno's transit corridors have eligible capacity for redevelopment with mixed uses including housing at or above metropolitan regional default densities. Therefore, the City focused on this area to accommodate housing.

However, for the purposes of specificity in this Housing Element, the City has identified a specific set of housing opportunity sites within the transit corridors, as well as the potential reuse of some former school sites, and sites located outside the TOD designation, all of which are especially appropriate and likely for redevelopment over the period of this Housing Element cycle. Figure 6-1 and Table 6-5 illustrate and list by parcel the specific opportunity sites identified for development or redevelopment of mixed-use or residential projects that are counted towards the City's RHNA obligation. Table 6-4 shows housing opportunity sites for housing to be consistent with the General Plan and TCP. The table indicates both the maximum and realistic development capacity of each parcel, as well as the connections to existing city infrastructure and services. The table also describes the existing uses on each site.

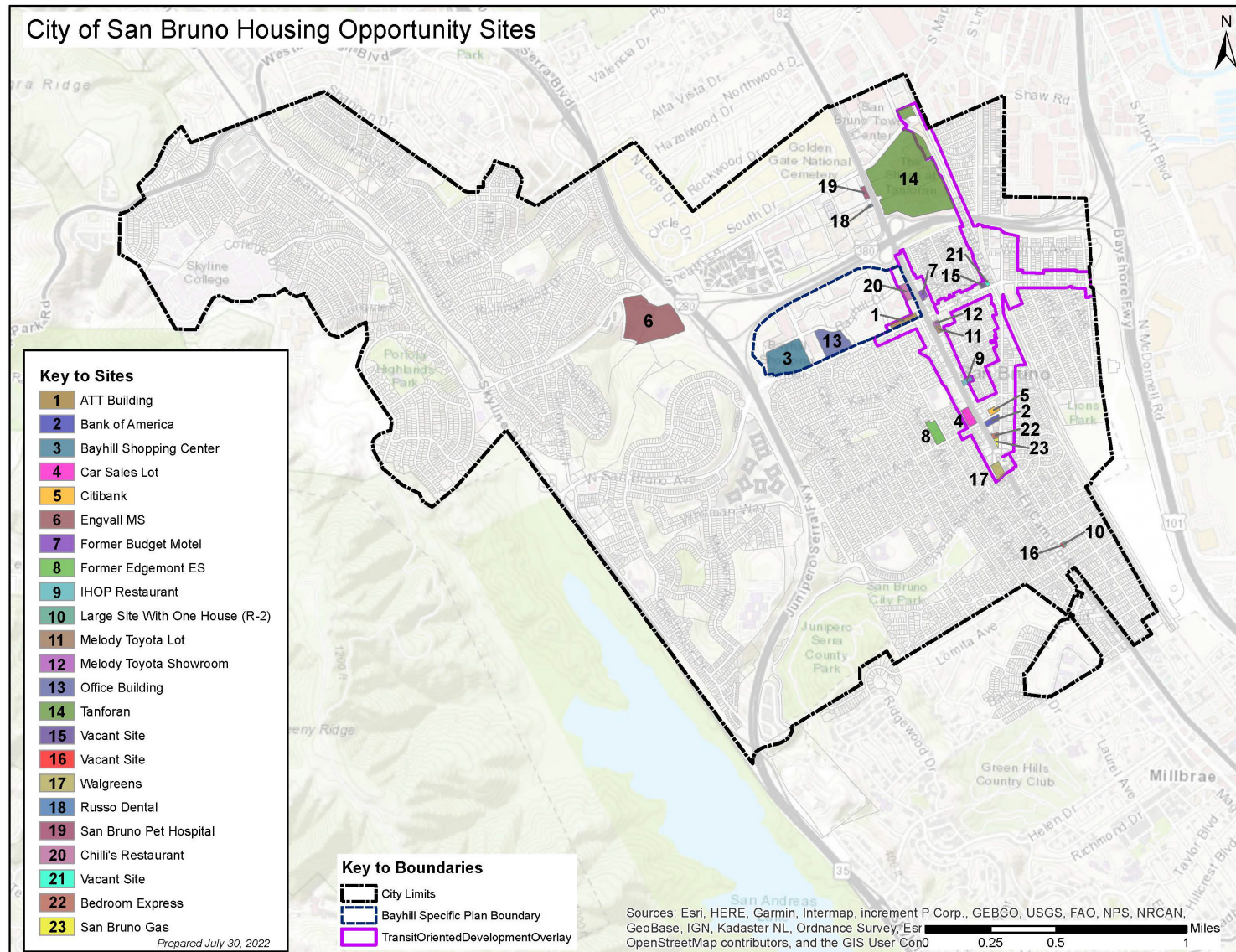


Figure 6-1 Map of Housing Opportunity Sites

Source: City of San Bruno 2022.

TABLE 6-5 HOUSING OPPORTUNITY SITES ZONED FOR RESIDENTIAL DEVELOPMENT (COUNTED FOR RHNA)

Map ID	APN	Address	Description of Current Use	General Plan Land Use	Zoning Designation	Parcel Size (Acres)	Maximum Units per Acre (by General Plan Land Use)	Realistic Unit Capacity	Infrastructure Capacity	Opportunities or Constraints?	Included in Prior HE	Requires Rezone
1	020071050	840 San Bruno Ave	AT&T Building	TOD	TOD-2	1.57	n/a	320	Yes	Vacant office building	No	No
2	020362180	465 San Mateo Ave	Bank of America	TOD	CBD	0.73	n/a	45	Yes	Underutilized property with viable bank	Yes	No
3	020012190	851 Cherry Ave	Bayhill Shopping Center	TOD	BNC	9.21		210	Yes	Existing commercial shopping center	No	No
4	020256130	529 El Camino Real	Vacant used car sales lot	TOD	TOD-2	0.11	n/a	72	Yes	Underutilized, marginal use; One owner; Majority of site is surface parking with small 1-story commercial building; 10 parcels under the same ownership would be consolidated into a .82-acre site	Yes	No
	020256140					0.11						
	020256150					0.17						
	020256160					0.06						
	020256170					0.06						
	020256180					0.06						
	020256190					0.06						
	020256250					0.04						
	020256260					0.11						
	020256270					0.14						
	020256280					0.07						
5	020362190	475 San Mateo Ave	Citibank	TOD	CBD	0.70	n/a	60	Yes	Underutilized property with viable bank and surface parking lot	Yes	No
6	019270260	2101 Sneath Ln	Former Engvall ES, current Golf driving range	Low Density Residential	R-1	11.11	8	118	Yes	Vacant former school site	Yes	No
	019270270				R-1	10.0	8				yes	No
7	020116310	850 El Camino Real	Former Budget Motel	TOD	TOD-2	0.62	n/a	60	Yes	Vacant site	Yes	No
8	020253050	500 Acacia Ave	Former Edgemont MS, current district offices	Low Density Residential	R-1	2.20	8	16	Yes	Underutilized school district property that has gone through the disposition process	Yes	No

TABLE 6-5 HOUSING OPPORTUNITY SITES ZONED FOR RESIDENTIAL DEVELOPMENT (COUNTED FOR RHNA)

Map ID	APN	Address	Description of Current Use	General Plan Land Use	Zoning Designation	Parcel Size (Acres)	Maximum Units per Acre (by General Plan Land Use)	Realistic Unit Capacity	Infrastructure Capacity	Opportunities or Constraints?	Included in Prior HE	Requires Rezone
9	020145020	590 El Camino Real	IHOP Restaurant	TOD	TOD-2	0.10	n/a	42	Yes	Underutilized property with viable restaurant and surface parking lot	Yes	No
	020145030					0.10	n/a		Yes			
	020145010					0.01	n/a		Yes			
	020145470					0.30	n/a		Yes			
10	021172130	116 San Marco Ave	Single-family dwelling (SFD)	Low Density Residential	R-2	0.10	8	2	Yes	Vacant site	No	No
11	020126050	750 El Camino Real	Former vehicle sales lot	TOD	TOD-2	0.1	n/a	41	Yes	Vacant former vehicle sales lot	No	No
	020126140					0.3	n/a		Yes		No	No
12	020126200	750 El Camino Real	Former vehicle showroom	TOD	TOD-2	0.3	n/a	34	Yes	Vacant building, currently for sale	No	No
13	020017020	801–851 Traeger Dr.	Office Building	Regional Office	BRO	6.1	n/a	205	Yes	Office building recently rezoned for housing option at owner's request	No	No
14	014316330	1150 El Camino Real	Tanforan	Regional Commercial	P-D	11.8	n/a	1,000	Yes	Aging mall that has lost its anchor tenants	No	Yes
	014316360	1150 El Camino Real				n/a						
	014316300	1122 El Camino Real				n/a						
	014316240	1122 El Camino Real				n/a						
	014311060	1292 Huntington Ave				n/a						
15	020111160	170 San Bruno Ave W	Vacant lot	TOD	TOD-1	0.29	n/a	42	Yes	Vacant site, across the street from Caltrain Station	Yes	No
16	021172120	San Marco Ave	Vacant Lot	Low Density Residential	R-2	.10	8	2	Yes	Vacant site adjacent to a residential building	No	No
17	020293030	333 El Camino Real	Walgreens	TOD	TOD-2	1.3	n/a	150	Yes	Existing Walgreens store on-site. Developer interest	No	No
18	020213200	1101 El Camino Real	Russo Dental	High Density Residential	P-D	.10	40	15	Yes	Dental Office	No	Yeso
19	020013100	1151 El Camino Real	San Bruno Pet Hospital	Multi Use	C-N	0.60	n/a	60	Yes	Vet Office	No	Yeso
20	020019080	899 El Camino Real	Chili's Restaurant	TOD	TOD-2	1.3	n/a	100	Yes	Existing restaurant on-site	No	No
21	020111150	104 San Bruno Ave W	Vacant lot	TOD	TOD-2	0.17	n/a	26	Yes	Vacant site, across the street from Caltrain Station	Yes	No



TABLE 6-5 HOUSING OPPORTUNITY SITES ZONED FOR RESIDENTIAL DEVELOPMENT (COUNTED FOR RHNA)

Map ID	APN	Address	Description of Current Use	General Plan Land Use	Zoning Designation	Parcel Size (Acres)	Maximum Units per Acre (by General Plan Land Use)	Realistic Unit Capacity	Infrastructure Capacity	Opportunities or Constraints?	Included in Prior HE	Requires Rezone
22	020362240	426 El Camino Real	Bedroom Express	TOD	CBD	.30	n/a	49	Yes	Retail furniture store	Yes	No
23	020362210	401 San Mateo Ave	San Bruno Gas	TOD	CBD	.20	n/a	40	Yes	Gas station at entrance to downtown	Yes	No
Grand Total All Opportunity Sites								2,709				

^a Exclusive of state-mandated affordable housing density bonus, which would further increase the achievable maximum units per acre.

Source: City of San Bruno, 2022.

These sites allow for the development of a wide variety of housing by right, including single-family, duplex, multi-family, ownership and rental, factory-built or other manufactured housing, transitional housing, supportive housing, senior housing, and more. Most of the sites are occupied by very low value or transitional uses such as vacant buildings or lots, parking lots, and used-car or used-goods dealers, making all the sites particularly attractive targets for redevelopment in the near-term. None of the sites are currently residential uses, thus redevelopment poses no risk of displacing households.

Throughout the TOD designation no maximum dwelling unit density is prescribed. Instead, maximum density is limited by development standards that limit the building envelope. The calculations used to estimate realistic development capacity along the transit corridors assume complete redevelopment of each site primarily based on conversations with developers and based on the density of similar housing developments that were approved or proposed nearby. In all cases, the estimated densities are considerably lower than could be permitted using the City's Density Bonus Ordinance.

The TOD designation only specifies commercial uses at key intersections, and developers have indicated a preference for a minimal amount of commercial space unless they have already partnered with a high-quality tenant. Therefore, the projected residential development capacity for mixed-use sites assumes mostly residential development to produce the quantified objectives; for the TOD designation it is assumed that about 5-percent of a project could be for non-residential uses. Furthermore, the assessment of sites that may undergo change is very conservative, focusing on properties where developers have expressed interest, properties that have marginal uses, or properties that have underutilized surface parking lots. Additionally, the City has not received much developer interest in office uses within its TOD districts.

While nonresidential uses are permitted in the TOD districts, there has not been strong demand for non-residential or new office uses in these districts. Office uses are a strong competing use for those properties that are concentrated near other office uses, such as the two properties (851 Cherry Avenue and 801-851 Traeger Drive) within the Bayhill Specific Plan area. Properties within the Bayhill Specific Plan area were included in the inventory because those property owners expressed an interest in the Housing Overlay during development of the specific plan. It has been difficult to find tenants for commercial storefronts in recent years and some developers are finding ground floor retail to be cost prohibitive in the city. Furthermore, many of the sites in the inventory are too small for feasible large scale nonresidential development.

3. SENATE BILL 9 PROJECTIONS

In September 2021, Governor Newsom signed SB 9 into law, with an effective date of January 1, 2022. SB 9 mandates ministerial approval of duplexes on lots zoned for a single-family residence and requires ministerial approval of subdivisions of a single-family lot into two lots, creating the theoretical possibility of four units on each single-family parcel in the state (with some exceptions). The Turner Center for Housing Innovation at UC Berkeley conducted extensive analysis statewide to determine how many parcels could feasibly utilize the provisions of SB 9 and found that approximately seven percent of single-family parcels throughout the state may redevelop in this way. Included in the Housing Element is Program 2-D to adopt implementing ordinances to facilitate SB 9 compliance. However, San Bruno has no track record for SB 9 projects, thus the market feasibility for these units could not be determined. Therefore, no SB 9 units are included in the Sites Inventory.

4. DENSITY AND AFFORDABILITY ASSUMPTIONS

Due to the predominantly built-out nature of San Bruno, most development will occur as infill on underutilized sites. Sites that allow densities of at least 30 units per acre may be counted as meeting the lower-income RHNA, based on the provisions of state law allowing developments at "default densities" (at least 30 units per acre in San Bruno). This rule applies to sites located in the TCP where there isn't a density

limitation. The affordability assumptions for these sites is 35% lower income and 65% moderate income and above.

Sites located in the R-1 and R-2 zones have a General Plan designation of Low-Density Residential, allowing 2.1 to 8 units per acre. These sites, such as the former Engvall School site, will develop at densities less than 30 units per acre, and thus be subject to the City's affordable housing program which requires 15% of the units to be affordable.

5. ASSEMBLY BILL 1397: SITE SUITABILITY, REALISTIC CAPACITY AND RE-USE OF SITES

Assembly Bill (AB) 1397 amended Housing Element Law, specifically Government Code Section 65580, 65583 and 65583.2.2, to strengthen the obligation of local governments to identify a supply of adequate sites available to meet their housing needs for all income levels in their housing elements. For other sites, the number of affordable units is based on those entitlements or the applicable inclusionary housing requirement of 15% citywide.

AB 1397 imposes stricter requirements for sites smaller than ½ acre or greater than 10 acres in size. The Sites Inventory includes several sites that are less than one-half acre in size. Lot consolidation is encouraged by the City within the Transit Corridors Plan area, but it can be difficult to achieve. Several recent multi-family developments in the Transit Corridors Plan area have been proposed on lots that are smaller than 0.5 acres at densities greater than 30 units per acre, therefore, these sites are counted as meeting the lower-income RHNA, based on the provisions of state law allowing developments at “default densities”.

Due to the built-out nature of San Bruno, most sites have existing uses. AB 1397 adds specific criteria for assessment of the realistic availability of non-vacant sites during the planning period. If non-vacant sites accommodate half or more of the lower-income need, the Housing Element must present “substantial evidence” that the existing use does not constitute an impediment for additional residential use on the site. Non-vacant sites included in the inventory have been chosen due to their location, existing uses, and potential for intensification. To ensure that appropriate sites have been chosen, properties that show recent investments or updates or that contain unique uses are not included.

AB 1397 also requires that specific parameters be placed on sites used in previous planning cycles that were not developed but are used in the current Housing Element to meet the lower income RHNA. Under AB 1397, the site must meet the required default densities (i.e., zoned to allow 30 dwelling units/acre); and the site must allow residential use ‘by right’ for housing developments in which at least 20 percent of the units are affordable to lower income households. ‘By right’ means that no review is required under the California Environmental Quality Act (CEQA), unless a subdivision is required, and the project can only be reviewed using ‘objective’ design standards. As noted in HCD guidance documents due to updates in the prior planning period to the general plan or other planning activities, some sites previously identified in the housing element may have been rezoned allowing a higher density and therefore, increase the potential housing capacity of the site. In these instances, sites can be counted towards the lower income RHNA for the housing element inventory because the zoning characteristics have changed. In 2021, since the City rezoned all the sites within the TCP area to align with the specific plan and the General Plan, all TCP sites are considered new sites.

6. HOUSING OPPORTUNITIES ON FORMER SCHOOL SITES

Former school sites available for residential reuse within San Bruno include the former Edgemont School and former Willard Engvall School sites. While these former school sites will primarily be market rate, they represent opportunities for redevelopment in lower density neighborhoods that are not in the TOD districts

or major corridors. The former school sites require no zoning changes prior to redevelopment with residential use. The realistic development capacity of these sites is 6-8 units per acre because they are designated Low-Density Residential under the General Plan and Zoning (a maximum of eight units to the acre). Development of these sites assumes a provision of 15% affordable housing as required by City ordinance. The affordable housing units in these projects will be single-family units affordable to low- and moderate-income households.

In addition to the Edgemont and Engvall school sites, the City has received an application to redevelop the former Crestmoor High School site. The site requires no zoning changes prior to redevelopment with residential use. The realistic development capacity of this site is 6-8 units to the acre. Development of the site assumes a provision of 15% affordable housing as required by City ordinance. The affordable housing units in this project will be single-family units affordable to low- and moderate-income households. In addition to housing, the project will include dedicated park and field space. This site is not included in the Sites Inventory but described here as an example of redevelopment of a former school site.

7. EVIDENCE OF DEVELOPMENT/REDEVELOPMENT SUMMARY

The majority of San Bruno's Sites are located in San Bruno's TOD-1, TOD-2, C-N, C-B-D, and P-D zoning districts and adequate evidence exists for the development of these sites consistent with this Housing Element based on recent development in San Bruno's high-density corridors. For example, recent development or development proposals at 406–418 San Mateo Ave (88 dwelling units per acre) and 111 San Bruno Avenue (84 dwelling units per acre) provide evidence of development potential for similarly situated sites within the TOD and C-B-D districts. Neither of these approved projects exercised the City's density bonus provisions. It is assumed that opportunity sites such as such as 104 San Bruno Avenue or 401 San Mateo Avenue will be developed at densities consistent with similar past projects located nearby in the same zoning district which informed the site inventory estimates.




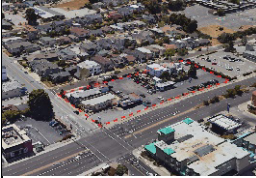
In estimating the development potential of San Bruno's opportunity sites, the City also considered the following factors:


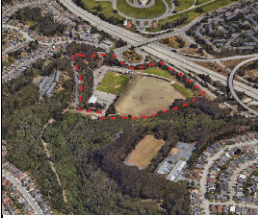


- Recent housing development in the city's transit corridors has ranged from 53 dwelling units per acre to a high of 224 dwelling units per acre with state and local incentives. Additional incentives were not considered in estimating dwelling capacity for properties listed in the Sites Inventory. However, local incentives were considered for projects with submitted applications which included the request.
- TOD designation San Bruno's transit corridors have eligible capacity for redevelopment with mixed uses including housing at or above metropolitan regional default densities.
- TOD designation allows for no maximum dwelling unit density. Instead, maximum density is limited by development standards that limit the building envelope.
- Several recent multi-family developments in the Transit Corridors Plan area have been proposed on lots that are smaller than 0.5 acres at densities greater than 30 units per acre.
- Nonresidential uses are also permitted in the TOD districts.
- Further justification for site development is provided in Table 6-6 below.





In all cases, the estimated densities of San Bruno's opportunity sites are lower than could be permitted using the City's Density Bonus Ordinance. The assessment of sites that may undergo change is very conservative, focusing on properties where developers have expressed interest, properties that have marginal uses, or properties that have underutilized surface parking lots.





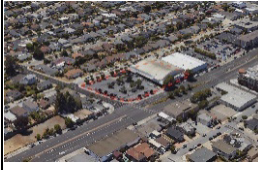


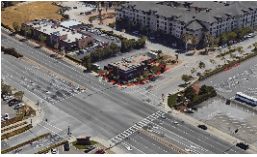
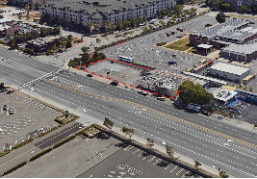

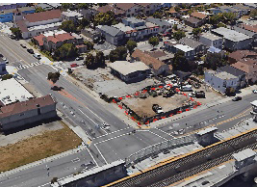
TABLE 6-6 SITE INVENTORY JUSTIFICATION



	Site Name	Address		Evidence of Development/Redevelopment Potential
1	AT&T Building	840 San Bruno Avenue		Vacant office building (former owned and occupied by AT&T) in the TOD Zoning District. The property was purchased in 2021 for the purpose of redevelopment. An applicant has submitted an application requesting a density bonus to construct two 10-story residential buildings containing 445 total dwelling units, which is more than 280 dwelling units per acre. Staff has reviewed the submittal and determined it to be overly ambitious because it proposes to go multiple floors over the height limit, therefore, the dwelling unit estimate for the site has been reduced to 340 units to reflect a smaller potential project with fewer floors.
2	Bank of America	465 San Mateo Avenue		Underutilized property with underutilized bank in the Central Business District. In 2018 Bank of America had 1,720 fewer branches than in 2008, a 28% drop. The rapid adoption of mobile banking has allowed banks to reduce the number of branches they operate. In 2018 Bank of America (BAC) announced that deposits made on mobile devices like smartphones and tablets are outpacing those made at branches for the first time. The bank building occupies a quarter of the site which is otherwise developed with surface parking that services the bank use. It is included in the inventory due to its downtown location, existing underutilized use which is ripe for downsizing, and potential for intensification. There have not been any recent major investments in the property that would discourage redevelopment. 45 dwelling units are estimated for the site which is a dwelling unit density of 83 units per acre, which is within the range of other projects approved within the TOD and C-B-D districts. Additionally, the site has three street frontages which affords it multiple opportunities for dwelling exposure.
3	Bayhill Shopping Center	851 Cherry Avenue		Viable commercial shopping center that is part of the Bayhill Specific Plan adopted in 2021 and rezoned per request of the owner of the property to include a residential zoning overlay. This site has been included because of its location, potential for intensification, and the owners' interest in the residential zoning overlay. The dwelling unit density is consistent with the maximum dwelling unit density permitted on the site pursuant to the zoning overlay.
4	Vacant used car sales Lot	529 El Camino Real		This is a vacant site in the TOD-2 Zoning District that was formerly used as a vehicle sales lot. A majority of the site is surface parking with a small 1-story commercial building. Ten parcels under the same ownership would be consolidated into a 0.82-acre site. Vehicle sales is a non-conforming use in the zoning district. If such nonconforming use ceases for a continuous period of six months, the subsequent use of such conforming structures shall be in conformity with the zoning regulations and General Plan designations for the district in which said building is located. The site was included in the City's past two Housing Element sites inventories. 72 housing units are estimated for the site, which is a density of 88 units per acre, similar to the approved Mills Park project located two blocks away in the City's TOD district and greater than the default density of 30 units per acre.

	Site Name	Address		Evidence of Development/Redevelopment Potential
5	Citibank	475 San Mateo Avenue		Similar to the Bank of America site above, the subject site is an underutilized bank surrounded by a surface parking lot within the Central Business District. Advances in mobile banking has allowed banks to shrink the size and number of branches they operate. This site is included in the inventory due to its downtown location, existing underutilized use which is ripe for downsizing, and potential for intensification. There have not been any recent major investments in the property that would discourage redevelopment. The site can accommodate 60 dwellings which is a density of 78 units per acre, within the density range of the approved 111 San Bruno Ave. project and the built 406–418 San Mateo Ave. project.
6	Engvall MS	2101 Sneath Ln.		This is the former Engvall Middle School, which was formerly a golf driving range. A project proposal has been submitted to the City for 118 single-family dwelling units which is currently under review. A maximum of eight dwelling units per acre are permitted in the Low-Density Residential General Plan designation and the R-1 Zoning. The site does not require a zoning change prior to redevelopment with residential use. The site was included in the City's past two Housing Element sites inventories with an estimate for 127 total dwelling units. Fifteen percent of the units would be affordable pursuant to the City's affordable housing ordinance.
7	Former Budget Motel	850 El Camino Real		Vacant parcel in the TOD-2 Zoning District that was included in the Sites Inventory for the past two housing elements with an estimate of 25 total dwelling units. For the current Housing Element, the dwelling unit estimate was reevaluated based on recent housing development in the city's Transit Corridors Plan area which has ranged from 53 dwelling units per acre to a high of 224 dwelling units per acre with state and local incentives. San Bruno's TOD designations have eligible capacity for redevelopment with mixed uses including housing at or above metropolitan regional default densities. 60 dwelling units are estimated for the site, which is a density of 83 dwelling units per acre, within the density range of the approved 111 San Bruno Ave. project and the built 406–418 San Mateo Ave. project but much lower than the 280 units per acre proposed at 840 San Bruno Ave. located nearby
8	Former Edgemont ES	500 Acacia Ave.		This is an underutilized school district property that has gone through the disposition process and is currently being used for school district administrative offices. The site was included in the City's past two Housing Element sites inventories with an estimate for 13 total dwelling units. Staff has reevaluated the site and estimates the site could yield 15 dwelling units, which is the maximum number of dwelling units per acre permitted in the Low-Density Residential General Plan designation and the R-1 Zoning District. The site does not require a zoning change prior to redevelopment with residential use at this density. The site would likely be developed with small lot residential development with reduced setbacks and yard. Fifteen percent of the units would be affordable in compliance with the City's affordable housing ordinance.

	Site Name	Address		Evidence of Development/Redevelopment Potential
9	IHOP	590 El Camino Real		Underutilized property including 4 parcels with viable restaurant and surface parking lot located in the TOD-2 Zoning District. The IHOP chain experienced financial troubles during the Coronavirus Pandemic and is still trying to recover. Although the financial situation for this particular location is unknown, it was chosen because of its location, existing uses, and potential for intensification. There haven't been any recent investments or updates to the site that would discourage redevelopment. In October 2020, IHOP announced plans to close nearly 100 locations across the U.S. by mid-2021. That was after IHOP already closed 16 locations in the previous quarter. San Bruno's IHOP is situated on a large 0.6-acre lot which is primarily surface parking. The lot is located just across the street from San Bruno City Hall, the City's main fire station, and its main library, as well as Allen Elementary School, and less than a half mile from San Bruno's Caltrain Station. These neighborhood assets as well as the location in the TOD district make this an ideal location for encouraging walkable, well-connected, moderate intensity mix of retail, restaurant, and residential development. 42 dwelling units are estimated for the site, which is a density of 60 dwelling units per acre. The estimated density is lower than other TOD sites in the inventory because the site is not contiguous and is bisected by a street (Hensley Ave.).
10	Vacant site	116 San Avenue		Vacant 5,000 sq. ft. site on San Marco Avenue. Currently for sale for \$450K. Likely limited to two total dwelling units due to the low-density residential land use classification. No affordable units are required if the site yields fewer than five total dwelling units.
11	Former Melody Toyota Sales Lot	750 El Camino Real		Vacant surface parking lot that was once part of the Melody Toyota sales lot. The site was vacated a few years ago when Melody consolidated their operations at another location and has been vacant for over two years. The site is within the TOD district, adjacent to the proposed 6-story multi-family building at 732-740 El Camino Real. 34 units are estimated for the 0.30-acre development site which is a density of 113 units per acre. This density is higher than other TOD sites but lower than the adjacent approved project at 732-740 El Camino Real.
12	Former Melody Toyota Showroom	750 El Camino Real		Vacant 2-story commercial building that was once the home of the Melody Toyota showroom who vacated the site and consolidated their operations at another location a few years ago. A new conditional use permit would be needed to resume vehicle sales at this location. The site is within the TOD district, adjacent to the proposed 6-story multi-family building at 732-740 El Camino Real. 41 units are estimated for the 0.40-acre development site which is a density of 103 units per acre. This density is higher than other TOD sites but lower than the adjacent approved project at 732-740 El Camino Real which was approved at 222 units per acre.

	Site Name	Address		Evidence of Development/Redevelopment Potential
13	Office Building	801 - 851 Traeger Avenue		Office building recently rezoned for housing option at owners' request. This site has been included because of its location, potential for intensification, and the owners' interest in the residential zoning overlay. The dwelling unit density is consistent with the maximum dwelling unit density permitted on the site pursuant to the zoning overlay.
14	Tanforan	1122 El Camino Real-1150 El Camino Real		Aging mall that has lost many of its anchor tenants that is designated a Planned Development Zoning District. The site was purchased in 2021 for redevelopment and the City has been in discussion with the developer on site redevelopment and the developer is committed to including 1,000 housing units in the project. The project was reviewed by the Airport Land Use Commission (ALUC) as part of the Housing Element review. In Fall 2022, the developer submitted an application for full redevelopment of the site with a minimum of 1,000 housing units. The planned development plan amendment, CEQA review, and project entitlements are anticipated to be completed by Fall 2024.
15	Vacant	170 San Bruno Ave.		Vacant site, across the street from Caltrain Station in the TOD Zoning District. The applicant has submitted a density bonus application to the City for a project with 42 dwelling units, which is 140 dwelling units per acre. Recent housing development in the city's transit corridors has ranged from 53 dwelling units per acre to a high of 224 dwelling units per acre with state and local incentives. The proposed project falls within this range.
16	Vacant	San Marco Ave.		Vacant 5,000 sq. ft. site adjacent to 116 San Marco Avenue. Currently for sale for \$450K. Likely limited to two total dwelling units due to the low-density residential land use classification. No affordable units are required if the site yields fewer than 5 total dwelling units.
17	Walgreens	333 El Camino Real		Viable Walgreens store in the TOD Zoning District. Pre-pandemic, Walgreens said it would pare its real estate, announcing in 2019 that it would close 200 U.S. locations. This is in addition to an additional 200 stores Walgreens previously closed starting in 2015. In November 2020 Amazon began to compete in the prescription medication market by offering home delivery for prescription medications online, making a difficult market even more competitive. The City has received confirmed developer interested in developing this site with 150 dwellings units but no application has been submitted. The property has a large surface parking lot and shows no signs of recent investments that would preclude redevelopment.

	Site Name	Address		Evidence of Development/Redevelopment Potential
18	Russo Dental	1101 El Camino Real		Single story dental office located in Planned Development Zoning District. This site has been chosen due to its location, existing use, and potential for intensification. To ensure that appropriate sites have been chosen, properties that show recent investments or updates or that contain unique uses are not included. The dental office is located within the P-D District, within a half-mile of the San Bruno BART Station and located across the street from a key opportunity site (Tanforan) where San Bruno expects to see the development of 1,000 residential units. This area is particularly saturated with dental offices with 16 existing dentist offices within 1-mile of the site. The P-D district would need to be amended to allow for housing at this location.
19	San Bruno Pet Hospital	1151 El Camino Real		General Plan designation allows housing but the zoning is Neighborhood Commercial which does not allow residential uses. The site would need to be rezoned to accommodate housing. The site was included in the inventory because of its proximity to transit, existing use, and potential for intensification. The pet hospital is located on a 0.6-acre lot that is primarily occupied by surface parking. It is located across the street from a key opportunity site (Tanforan) where San Bruno expects to see the development of 1,000 residential units. There are two existing pet hospitals within 1.5 miles of the site.
20	Chilis	899 El Camino Real		Viable restaurant on-site located in a TOD Zoning District. Standalone, large format restaurants with significant surface parking lots, are not expanding and will likely contract over the next decade. These restaurants operate in a highly competitive market and there is a trend towards increasing demand for local restaurants or regional chains. Recent housing development in the city's transit corridors has ranged from 53 dwelling units per acre to a high of 224 dwelling units per acre with state and local incentives. TOD designation San Bruno's transit corridors have eligible capacity for redevelopment with mixed uses including housing at or above metropolitan regional default densities. Recent housing development in the city's transit corridors has ranged from 53 dwelling units per acre to a high of 224 dwelling units per acre with state and local incentives. TOD designation San Bruno's transit corridors have eligible capacity for redevelopment with mixed uses including housing at or above metropolitan regional default densities.
21	Vacant	104 San Bruno Ave.		Vacant site, across the street from Caltrain Station located in the TOD-1 Zoning District which has no density limitation. 25 housing units are estimated for the site which is a density of 147 dwelling units per acre. Recent housing development in the city's transit corridors has ranged from 53 dwelling units per acre to a high of 224 dwelling units per acre with state and local incentives. Estimated number of units based on similarly situated properties (e.g., 111 San Bruno Ave. and 170 San Bruno Ave.) developed or proposed on nearby or adjacent sites, not based on zoning designation.

	Site Name	Address		Evidence of Development/Redevelopment Potential
22	Bedroom Express	426 El Camino Real		Retail furniture store located in Central Business District. The site was included in the past two housing elements as part of the triangle development site. It is proving difficult to consolidate the sites for the triangle development so the subject site has been included as a standalone development project where it is more likely to redevelop. While demand for furniture and retail furniture sales have increased over the last several years, the retail furniture industry has adopted e-commerce as essential channel for home delivery and has resulted in skyrocketing sales through Wayfair, Amazon, Etsy, Macy's, Home Depot, Lowes and others. Local trends suggest that without significant investments that meet e-commerce needs, and a loyal customer base, local retailers may face redevelopment pressure in the next decade, especially when located in a TOD corridor. This location is within a half-mile of the San Bruno Cal Train Station and within 1 mile of three other furniture retailers.
23	San Bruno Gas	401 San Mateo Avenue		Gas station located at the southern entrance to downtown San Bruno in the Central Business District. The site is included in the inventory because of its prominent location and because it is underutilized, having discontinued its vehicle service bays. The site was included in the past two housing elements as part of the triangle development site. But it is proving difficult to consolidate the sites for the triangle development so the subject site has been included as a standalone development project. 40 dwelling units are estimated for the site which is a density of 200 dwelling units per acre. This density is within the range of recent housing development in the city's transit corridors which has ranged from a low of 53 dwelling units per acre to a high of 224 dwelling units per acre with state and local incentives. A higher density is anticipated for the site because it has multiple street frontages, providing more design flexibility and opportunity for dwelling exposure. Site remediation may be required but is not expected to preclude residential development on the site.

Source: City of San Bruno 2022.

Non-vacant sites included in the inventory have been chosen due to their location, existing uses, and potential for intensification. To ensure that appropriate sites have been chosen, properties that show recent investments or updates or that contain unique uses are not included. San Bruno's opportunity sites allow for the development of a wide variety of housing by right, including single-family, duplex, multi-family, ownership and rental, factory-built or other manufactured housing, transitional housing, supportive housing, senior housing, and more.

8. ACCESSORY DWELLING UNITS

The City complies with AB 1866 by permitting accessory dwelling units in all residential zoning districts by right. In 2021, the City amended its zoning ordinance to provide for approval of ADUs through a ministerial building permit process that includes review by planning staff for conformance with the requirements of the Zoning Ordinance. The zoning code also allows for administrative relief through the use permit process when proposed ADUs do not comply with the standard requirements. Since ordinance adoption, the number of building permits issued for ADUs has significantly increased. In 2021, the City issued 70 building permits for ADUs, the most building permits for ADUs ever issued. To date, the City has issued 32 building permits for ADUs in 2022.



Jurisdictions can count accessory dwelling units towards meeting its overall RHNA obligation based on the average number of building permits the jurisdiction issued for ADUs over the previous three years (2019-2021), as specified in its annual progress report. San Bruno has an ADU ordinance pursuant to California Government Code Section 65852.2 which was updated in March 2021 in response to changes in state law. The ADU review process was streamlined in conjunction with the update and as a result 70 building permits were issued for ADUs in 2021, after issuing building permits for 7 ADUs in 2020, 17 in 2019, and 6 in 2018. Overall, the City was successful in permitting 121 ADUs over the course of the last Housing Element cycle. Based on this record, and anticipation of continued demand for ADUs in a difficult housing market and economy, the City anticipates the desire for ADUs to be near 2021 numbers as a result of the streamlined process. Projecting forward, staff estimates the City will permit 240 ADUs over the eight-year planning period, an average of rate of 30 units per year during this housing cycle. The changes to state ADUs laws that took effect in 2021 eliminated many of the barriers to ADU construction in the city and resulted in a steep increase in production in 2021. Continued ADU production in San Bruno is needed to further housing diversity and access to housing in higher resource areas in the western portion of the city.

The City's ADU affordability estimates are based on ABAG's ADU affordability assumptions. The break down is 30% Very Low, 30% Low, 30% Moderate, and 10% above moderate as follows.

TABLE 6-7 ADU AFFORDABILITY ASSUMPTIONS

Affordability	ABAG Affordability Percentage	Projected ADUs
Very Low	30%	72
Low	30%	72
Moderate	30%	72
Above Moderate	10%	24
Total	100%	240

Source: City of San Bruno 2022.

I. QUANTIFIED OBJECTIVES

Housing Element law requires that quantified objectives be developed with regard to new construction, rehabilitation, conservation, and preservation activities that will occur during the eight-year Housing Element cycle. Table 6-8 summarizes the City of San Bruno's quantified objectives for the provision of affordable housing opportunities based on its programs during the eight-year 2021-2029 Housing Element cycle. The quantified objectives in Table 6-8 establish the maximum number of housing units by income category that could be developed or rehabilitated during this Housing Element cycle. The table shows that the City's quantified objectives for 3,723 units includes units constructed since July 1, 2022, units in the pipeline, projected ADUs, plus units on sites that are already zoned for residential, as follows:

TABLE 6-8 TOTAL QUANTIFIED OBJECTIVES

Target	Extremely Low-Income*	Very Low-Income	Low- Income	Moderate-Income	Above Moderate-Income	Totals
RHNA	352	352	405	573	1,483	3,165
New Construction	249	250	613	589	1,904	3,605
Rehabilitation	0	0	5	0	0	5
Conservation/Preservation	0	0	0	0	0	0

* Pursuant to AB 2634, in estimating the number of extremely low-income households, a jurisdiction can use 50% of the very low-income allocation or apportion the very low-income figure based on Census data. The extremely low-income figure shown above is based on the 50% rule.
Source: City of San Bruno 2022.





The goals, programs, and implementation actions presented in this chapter serve to support the State of California’s overarching aim of providing “decent housing and a suitable living environment for every Californian” (Government Code Section 65583(b) and (c)). The housing goals, programs, and implementation actions were created for the purpose of meeting the housing needs of the citizens of San Bruno from 2023-2031 given the limitations imposed by current political, economic, and social conditions, and in consideration of available state and federal funding.

Each program includes quantified objectives, the agency responsible for implementation, and a schedule of actions to be taken during the planning period, each with a timeline for implementation. Some programs are ongoing, such that there will be beneficial impacts of the programs throughout the planning period.

This Element carries over some programs from previous adopted Elements and amends them to better facilitate the creation and retention of housing for lower-income households and households with special needs. Some programs have been eliminated because they were completed in the previous RHNA cycle or they were not very effective.

Housing Element goals are listed in Table 7-1 under Goals.

A. KEY INPUT AND DIRECTIONS

Based on the community engagement and the analysis of needs and the obligation to AFFH, San Bruno heard we need to streamline a complicated review process, provide more information on our website and conduct more proactive outreach to resident on fair housing issues.

1. APPROVAL PROCESS

San Bruno staff heard that developers are struggling with the approval process. To help address this concern, we propose the following new programs:

- Streamlining CEQA.

- Establish a pre-submittal conference.
- Establish by-right standards.
- Offer fee deferrals.
- Offer Priority processing.
- Reduce parking requirements.
- Remove zoning constraints.

We heard the City can do a better job providing information. To help address this concern, we propose the following new programs:

- Consolidate fee schedules.
- Create a public dashboard.
- Provide more information on the City's website.

2. ENSURING ADEQUATE LAND ZONED FOR HOUSING

While San Bruno has a lot of land zoned for housing, more is needed to satisfy the city's RHNA obligation for this cycle. The current zoning is not a constraint on housing; however, the City needs to look for new opportunities, such as:

- Evaluate a ballot measure to increase heights along El Camino Real.
- Amend the R-2 district to permit two dwellings on all lots.
- Amend the Planned Development Plan for the Tanforan site to allow for a minimum of 1,000 housing units.

B. GOALS

TABLE 7-1 HOUSING ELEMENT GOALS SUMMARY

Goal Number	Goal Description
1	Remove constraints to housing development and improve the development review and approval process.
2	Increase the availability of housing throughout the city, especially affordable housing.
3	Improve the city's management of its affordable housing portfolio.
4	Promote equity in housing, protect residents from displacement, and support the needs of households with low incomes and special needs.



GOAL 1: Remove constraints to housing development and improve the development review and approval process.

Program 1-A: Identify ways to streamline the CEQA review process through the use of exemptions or by tiering off existing CEQA documents.

Where feasible, use categorical exemptions to expedite the environmental review of housing developments.

ACTIONS:

- Identify categorical exemptions for infill housing development and use them to reduce environmental review timelines.
- Develop a list of required environmental background studies needed to support categorical exemptions and add them to the application submittal checklist.
- Develop and adopt standard environmental conditions of approval for development projects.

METRIC:

- Reduce environmental review timeline for projects that qualify for a categorical exemption(s) by 25%.

Responsibility: Community and Economic Development

Funding Source: General Fund

Timeframe: One-year from certification

Program 1-B: Establish a streamlined pre-application development conference process with applicants.

Establish a formal pre-application development conference process for a reasonable fee that is voluntary for housing developers in order to reduce application processing time.

ACTIONS:

- Develop a pre-application submittal application and application submittal checklist.
- Provide a 30-day response to all pre-application submittals.
- Hold a meeting with potential applicants where staff may provide preliminary feedback on pre-application materials.

METRIC:

- For 75% of voluntary pre-applications, reduce the number of incompleteness letters for projects that are subsequently formally submitted for review to two rounds of review.

Responsibility: Community and Economic Development

Funding Source: General Fund, Developer Funded Pre-Application

Timeframe: One-year from certification

Program 1-C: Establish priority building permit processing and reduced plan check times for multi-family housing projects affordable to lower-income households.

Create a process that prioritizes review by all city departments for any housing development with two or more units that are 100% affordable to lower-income households.

ACTIONS:

- Create a priority permit processing program by first getting input from other reviewing departments and assessing staffing resources. Monitor project processing times every two years.

METRIC:

- Reduce the review timeline for first round plan check comments by 25% for priority projects. Ongoing; monitor project processing times every two years.

Responsibility: Community and Economic Development

Funding Source: General Fund

Timeframe: One-year from certification

Program 1-D: Review current design standards for compliance with recent case law and adopt additional design standards.

Adopt objective design standards for multi-family residential projects and amend the existing Residential Design Guidelines to clarify design expectations and expedite the development review process.

ACTIONS:

- Engage a consultant and/or staff to produce objective design standards.
- Once adopted, post the design standards document to the Planning Division website and reference it in all pre-application and development application materials.

METRIC:

- 25% reduction in design review processing time.

Responsibility: Community and Economic Development

Funding Source: General Fund

Timeframe: Two-years from certification

Program 1-E: Publicly post status updates on housing project permit approvals on the city website.

Create a housing dashboard for all active housing projects on the planning division website with the number of housing units indicated.

ACTIONS:

- Along with other project information provided, provide total number of housing units by affordability among other project information to be updated quarterly.
- Provide updates to the Planning Commission on progress when necessary.

METRIC:

- Increase transparency around housing development in the city.

Responsibility: Community and Economic Development

Funding Source: General Fund

Timeframe: One-year from certification



Program 1-F: Continue to consolidate fee schedules across departments to simplify administration and allow people to obtain schedules and documentation in one location. This includes providing a link to outside agency fee information.

Create a list of all pertinent housing development fees across all relevant city departments and provide links to fees for outside agencies so housing developers can easily review the information in one location.

ACTIONS:

- Create a comprehensive list of all housing development fees, with links to fees for outside agencies, and post them to the city website.

METRIC:

- Fee list posted on website and update it after any updates to the Master Fee Schedule are adopted by the City Council.
- All counter staff able to answer questions about approximate amounts of fees for various projects.

Responsibility: Community and Economic Development

Funding Source: General Fund

Timeframe: One-year from certification

Program 1-G: Continue to implement the City's Development Impact Fee Ordinance to allow for payment of certain types of development impact fees for 100% Affordable Housing projects to certificate of occupancy, instead or prior to building permit issuance.

Implement the City's Development Impact Fee Ordinance which allows for payment of certain types of development impact fees for qualifying housing development (e.g., 100% affordable projects) at certificate of occupancy, to reduce developer construction financing costs and overall upfront development costs.

ACTIONS:

- Implement the Development Impact Fee Ordinance of the Zoning Code and communicate to developers the ability to pay certain types of development impact fees for qualifying housing at certificate of occupancy.

METRIC:

- Lower up front project costs for eligible projects (request information from developers to assess impact).

Responsibility: Community and Economic Development

Funding Source: General Fund

Timeframe: Three-years from certification

Program 1-H: Monitor short-term residential rentals.

Property owners have an incentive to use rental properties as vacation rentals as opposed to having long-term tenants in order to maximize profits which reduces the supply of long-term housing units for sale or rent. The city regulates short-term residential rentals through a zoning permit process. To observe their impact on housing supply for long-term residents, the city will implement an annual monitoring procedure.

ACTIONS:

- Maintain an inventory of all approved short-term residential rentals in the city.
- The city will actively pursue code enforcement for unapproved short-term residential rentals in the city.
- The findings from the city's short-term residential rental monitoring will be presented to the public with the Housing Element's annual progress report.

METRIC:

- To better understand the impact of short-term residential rentals on overall housing supply.

Responsibility: Community and Economic Development, City Attorney

Funding Source: General Fund

Timeframe: Three years from certification

Program 1-I: Zoning Code amendments to remove constraints.

The City will annually review, and amend as necessary, the Zoning Code to ensure consistency with State Housing Government Code requirements and remove or lessen constraints on new housing development, pertaining to, but not limited to:

ACTIONS:

- Amend the parking requirement for emergency shelters to accommodate all staff working in the emergency shelter, provided that the standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone, in compliance with Government Code Section 65583(a)(4)(A)(ii). Adopt development standards for emergency shelters and ensure they are consistent with State law per California Government Code Section 65583(a)(4)(A)(ii).
- Amend the Zoning Code to allow low-barrier navigation centers for the homeless by right in zones that allow for mixed-use and nonresidential zones permitting multifamily uses, per Government Code Section 65662.
- Amend the Zoning Code for compliance with changes in California's density bonus law (Government Code Section 65915, as revised).

Responsibility: Community and Economic Development

Funding Source: General Fund

Timeframe: Two years from certification

GOAL 2: Increase the availability of housing throughout the city, especially affordable housing.

Program 2-A: Evaluate the possibility of putting forth a ballot initiative to amend Ordinance 1284 to increase residential density throughout the city, building heights and number of floors along the El Camino Real corridor.

Among the provisions of Ordinance 1284 is a limit on changes to previously established residential density in low-density residential districts and limits on building height and number of floors within the El Camino Real corridor outside the TCP.



ACTIONS:

- Amend the R-2 zoning district to remove the minimum lot area requirement of one dwelling unit per 2,900 sq. ft. of lot area and allow two dwellings per lot regardless of lot size, and require a minimum of two dwelling units per lot for new development.
- Amend the zoning for the area along the El Camino Real corridor, outside the TCP area, to increase the permitted height limit and permitted number of floors.
- Conduct proactive citywide outreach to determine community support for the measure. Outreach will be conducted before holding City Council study sessions and meetings and community input will be included staff reports.
- Conduct a zoning study of sites outside of the TCP area along the El Camino Real corridor that would be appropriate for residential and high-density residential zoning, including sites that currently do not allow housing.
- Hold study sessions with City Council to discuss findings and conflicts with Ordinance 1284.
- When directed by City Council, initiate rezonings.

METRIC:

- Increase the number of newly entitled housing units in the El Camino Real corridor over the eight-year planning period.
- Approve a minimum of 10 new housing units in the R-2 District over the eight-year planning period.

Responsibility: Community and Economic Development, City Manager, City Clerk, City Attorney

Funding Source: General Fund

Timeframe: Three years from certification

Program 2-B: Support the development of identified housing opportunity sites.

Work with property owners and the community to support and encourage the redevelopment of identified opportunity sites into housing with onsite affordable housing units.

ACTIONS:

- Actively engage property owners and the community about options to redevelop the proposed housing opportunity sites. Outreach to property owners will be conducted on a semiannual basis.
- Provide early consultation to assist density bonus projects and potentially utilize incentives to reduce barriers to development on housing opportunity sites. Some incentives may include: zoning incentives, density bonus, direct subsidies, as well as state, federal and local financial incentives such as grants, loans and tax credits.
- The city will identify and apply for state, federal and local financial incentives such as grants, loans and tax credits to support projects that include affordable housing. The city will seek to identify and apply for affordable housing financial incentive programs annually if available.
- Engage with property owners and developers to identify obstacles to developing sites..
- Create a webpage that lists the sites on the city's housing sites inventory list.
- Where feasible, encourage and facilitate lot consolidation in the TCP in support of the redevelopment of housing opportunity sites.

M E T R I C :

- Develop all of the housing opportunity sites within the current eight-year planning period, at the densities specified for a total of 2,709 housing units.

Responsibility: Community and Economic Development

Funding Source: General Fund

Timeframe: Ongoing

Program 2-C: Prepare Senate Bill (SB) 9 implementing zoning ordinance with objective standards for residential lot splits.

Update the Zoning Code to allow duplexes and lot splits on applicable single-family sites that are consistent with SB 9, to increase the production of lower-cost housing options in high resource neighborhoods.

A C T I O N S :

- Encourage the development of SB 9 projects throughout R-1 Districts, especially in the high resource neighborhoods located west of Skyline Boulevard (SR 35).
- Conduct an analysis two years after rezoning to determine success and identify more actions if needed.
- Conduct proactive outreach throughout R-1 Districts, especially in the high resource neighborhoods located west of Skyline Blvd. Outreach will be conducted before holding City Council study sessions and meeting on the Zoning Code update and community input will be included in staff reports.

M E T R I C :

- Approve five new SB 9 housing units in the R-1 District over the eight-year planning period with at least two of those units within the city's higher resource neighborhoods.

Responsibility: Community and Economic Development

Funding Source: General Fund

Timeframe: One year from certification

Program 2-D: Amend the Tanforan Mall Planned Development Plan to require a minimum of 1,000 housing units to be included within the redevelopment of the Tanforan Mall project proposal.

Require a minimum of 1,000 housing units, as documented in the city's *Reimagining Tanforan* visioning document, at the Tanforan mall site during the redevelopment project review process.

A C T I O N S :

- Tanforan mall will be entitled and approved with a minimum of 1,000 units and at least 15% deed restricted affordable units.
- Complete rezoning through an amendment to the current Planned Development Plan to allow residential uses on-site within three years.
- Encourage the developer to provide for more affordable units or deeper unit affordability than what is required by the City's Affordable Housing Ordinance (inclusionary requirement). Encourage the developer(s) to set aside units within the development for persons with disabilities.



- Provide incentives for residential developer(s) through parking reductions, direct subsidies, fee waivers, processing time and/or density bonuses, to increase the number of affordable units beyond the inclusionary requirement.

M E T R I C :

- Achieve a set aside of affordable units specifically for persons with disabilities.

Responsibility: Community and Economic Development

Funding Source: Developer Fees

Timeframe: Three years from certification

Program 2-E: Publicize affordable housing financing strategies.

Publicize the various financing strategies for development and expansion of affordable housing.

A C T I O N S :

- The City will continue to participate in and promote San Mateo County's Mortgage Credit Certificate (MCC) program for first-time homebuyers. Advertising the availability of the program through informational handouts available at City Hall, the Public Library, and the Senior Center and through the City website.
- Study and publicize available financing strategies for the development of new affordable housing on a semiannual basis.
- Inform property-owners and local non-profit and institutional groups of available resources through brochures, flyers in utility bills, cable TV, newspapers, department website, city's social media platforms, and the city's Focus newsletter. This outreach will occur at least once every six months.
- Coordinate and build relationships with affordable housing developers and advocates to raise awareness of potential financing sources.
- Develop a strategy to prioritize the use of San Bruno's affordable housing in-lieu and impact fees to create and preserve affordable housing in San Bruno, including supporting non-profit affordable housing organizations and providing financial support to new or rehabilitated affordable housing. See also Program 3-B (Affordable Housing Fund). This strategy will be developed two years from certification.

M E T R I C :

- Increase the number of affordable housing development applications submitted to the city.

Responsibility: Community and Economic Development Department

Funding Source: General Fund

Timeframe: Ongoing

Program 2-F: Encourage the production of extremely low-income units as well as a variety of housing types to meet the needs of populations with special and disproportionate housing needs.

In order to encourage building housing that will enhance access for extremely low-income households and residents with disproportionate housing needs (i.e., Hispanic residents, Other/Multiple race residents, American Indian or Alaskan Native residents, Black residents, large families, seniors, female-headed households, homeless, farmworkers, residents needing disability accommodations, overcrowded households and extremely low-income households) the City proposes strategically reducing development constraints on this type of housing production by pursuing the following actions.

ACTIONS:

- Encourage the inclusion of a few larger housing units in all new residential developments to serve the needs of larger households.
- Encourage the inclusion of a few larger housing units in all development for residents with disproportionate housing needs by prioritizing projects that serve populations with disproportionate housing needs for any project that is a recipient of a public subsidy, public land, or land, or any project entering into a community benefit agreement.
- Continue to develop new ways to implement a streamlined review process in order to expedite development review on projects providing 100% affordable housing or housing for special needs residents such as seniors and persons with disabilities. An example includes providing a streamlined checklist to facilitate expedited application processing.
- Commit the City to granting fee waivers or fee deferrals for projects that include housing units that will serve extremely low-income households or households with disproportionate housing needs.
- Consider allowing for the modification of development standards, granting of concessions for housing developments that include units affordable to extremely low-income households or that serve households with disproportionate housing needs.
- Where competitive proposals for any City-owned land, land dedicated to affordable housing under the city's inclusionary ordinance or city housing funds, the city shall grant additional points to proposals that address the city's most difficult to achieve housing priorities, by providing a greater number of extremely low-income units or committing to make a percentage of the units subject to a preference for people with special needs.
- The City will conduct proactive outreach to stakeholders about how to encourage the production of housing for households with disproportionate housing needs and extremely low-income households, including to both developers as well as residents in need. Outreach will be conducted before holding City Council study sessions and meetings and community input will be included in staff reports.
- The City will hold a study session with the City Council.
- The City will support and pursue funding applications for grant and loan programs to support the development of housing units for extremely low-income households or households with disproportionate housing needs. The City will seek to identify and apply for these programs annually if available.
- The City will provide outreach and coordination with affordable housing developers to support the development of units for extremely low-income households or households with disproportionate housing needs.
- The City will prioritize available funding (including from the City's Affordable Housing Fund (see program 3-B) for housing affordable to extremely low-income households and households with disproportionate housing needs. When available, the City will offer financial incentives or regulatory concessions to encourage a variety of housing types to meet the needs of extremely low-income households and households with disproportionate housing needs.
- Encourage diversity in unit size to ensure that 3- and 4-bedroom affordable rental housing units are provided for large families.

M E T R I C :

- Increase percentage of housing units built to accommodate residents with disproportionate housing needs and extremely low-income households during the planning period. Ongoing; monitor project processing times for development projects every two years.

Responsibility: Community and Economic Development

Funding Source: General Fund, Affordable Housing Fund

Timeframe: Within three years of certification

Program 2-G: Reduce parking requirements to encourage production of affordable housing units, housing units for extremely low-income households, and housing units for special needs populations.

While the City updated its citywide site development regulations for parking in 2019, in order to eliminate development constraints to affordable housing production the city proposes to strategically reduce parking requirements. In addition, the City shall encourage the inclusion of people with developmental and other disabilities in affordable housing by recognizing their transit dependence and establishing lower parking ratios for units targeted to people with developmental and other disabilities than would otherwise be required for affordable housing.

A C T I O N S :

- The City will recommend citywide reduction of or removal parking requirements for housing developments that serve developmentally and other disabled populations and extremely low-income populations.
- The City will adopt reduced parking requirements in the TCP for projects that include units affordable to lower incomes.
- The City will revise its ordinances to provide flexibility to limit parking required for affordable units for people with developmental and other disabilities to 0 spaces for each affordable studio or 1 bedroom unit and .5 spaces for an affordable 2-bedroom unit or larger. A similar reduction is recommended for affordable, physically accessible units.
- The City will conduct proactive outreach to stakeholders on this topic. Outreach will be conducted before holding City Council Study Sessions and meetings and community input will be included in staff reports.
- The City will hold a study session with the City Council.

M E T R I C :

- Increase percentage of housing units built to accommodate residents with disproportionate housing needs and extremely low-income households during the planning period

Responsibility: Community and Economic Development

Funding Source: General Fund

Timeframe: Within five years of certification

Program 2-H: Conduct a robust evaluation of the inclusionary housing program that evaluates the effectiveness of delivering extremely low-income units and units for residents with the greatest housing needs (e.g., single parent families, child-friendly housing, accessible units for persons with disabilities and disproportionate housing needs).

Continue to implement the required 15% affordable housing requirement for all projects with five or more units. Consider modifications to the ordinance to lessen or eliminate the moderate-income unit requirement and increase the low-income unit requirement, given the larger need for lower income units.

ACTIONS:

- Analyze the impact of changing our affordable housing inclusionary requirements for on-site affordable housing for each affordability level to maximize housing production for populations with the most housing needs (i.e., Very Low, Low, and Moderate) and bring forward to a study session with the City Council for direction at a future meeting.
- The City will conduct proactive outreach to stakeholders on this topic. Outreach will be conducted before holding City Council Study Sessions and meetings and community input will be included in staff reports.
- The City will hold a study session with the City Council.
- Review and amend, if necessary, the City's current affordable housing program requirements based on best practices, market feasibility and housing trends and implement the recommendations of the study.

METRIC:

- Increased number of inquiries from developers about affordable housing projects and increase the number of affordable housing applications submitted to the city.

Responsibility: Community and Economic Development Department

Funding Source: General Fund

Timeframe: Identify a consultant to perform the study within three years of certification. Implement the recommendations of the study within six years of certification.

Program 2-I: Issue an RFP for an affordable housing development feasibility study for City-owned sites.

To expand the stock of affordable housing sites, the City will conduct an affordable housing development feasibility study that evaluates available City-owned land that could potentially be developed with a dedicated affordable housing project.

ACTIONS:

- The City will issue an RFP for an affordable housing development feasibility study for City-owned sites. The study will include the following components:
 - Analysis of whether City-owned sites are subject to the Surplus Land Act and if so, the required steps to ensure compliance with the Surplus Land Act for each identified site.
 - Analysis of the option of selling or entering into a long-term ground lease for the site(s).
 - Implementation actions along with a schedule to facilitate development of city-owned sites with affordable housing. This may include for example that the City will pass a resolution stating that its City-owned parcels will be used for the public purpose (and the deed may be restricted for such a public purpose).
 - Findings from outreach with developers and other stakeholders on developing City-owned sites.
 - Identification of incentives for the development of City-owned sites including zoning incentives, fee waivers, direct subsidies, priority processing, and state, federal and local financial incentives such as grants, loans and tax credits.

- Recommended local, state, and federal funding programs for affordable housing development.
- Should an appropriate site or sites be identified and selected for disposition, the City will apply regulatory and zoning incentives necessary to evaluate if affordable housing development is feasible on the site(s).
- The City will conduct proactive outreach to the public and stakeholders when developing the study. Outreach will be conducted before holding the City Council study session. A section on public engagement will be included in the City Council staff report.
- The City will hold a study session with the City Council to review the findings of the study and obtain direction on the follow up actions to implement the study.

M E T R I C :

- Number of affordable housing units development on city-owned sites.

Responsibility: Community and Economic Development

Funding Source: Affordable Housing Fund

Timeframe: Three years from certification

Program 2-J: Sites inventory monitoring.

The City will implement an annual monitoring procedure of the capacity of affordable to lower income units on identified sites to accommodate the RHNA.

A C T I O N S :

- Maintain an inventory of available sites for residential development and provide it to prospective residential developers upon request.
- The City will identify and designate appropriately zoned sites to accommodate the shortfall, should approval of a development on a lower-income site result in a reduction of potential units to below the capacity needed to accommodate the RHNA.
- The City will monitor whether development on lower-income sites is occurring as expected related to development types, densities, and quantities. As necessary, in the event that the lower-income or moderate-income RHNA sites are not meeting intended objectives, the city will identify the availability of alternative sites with appropriate zoning in place.
- The City will monitor development in the new high-density mixed-use zones; if development is not proposed or occurring at expected levels, the City will implement additional incentives to facilitate expedited housing production. Specifically, the City will conduct additional outreach to property owners on RHNA and other multifamily zoned sites, waive preapplication meeting fees, and/or provide technical assistance to developers and property owners no later than 48 months from adoption.
- The City will annually report on the status and implementation of the Housing Element, including development occurring on identified sites.
- The City will act as a liaison between property owners and developers to facilitate housing production on non-vacant sites.

M E T R I C :

- Ensure the city issues building permits for a minimum of 2,709 dwelling units from the sites identified in the inventory at the specified affordability levels.

Responsibility: Community and Economic Development

Funding Source: General Fund

Timeframe: Annual monitoring

Program 2-K: Promote sustainable residential development that is energy efficient and reduces greenhouse gas emissions.

ACTIONS:

- Adopt and implement the updated Energy Code and Green Building Standards Codes with each Building Standards Code Revision (every 3 years), and also consider local code amendments that increases energy efficiency in housing construction. In order to promote energy efficiency, a local ordinance may require more stringent building standards than those required through Title 24.
- Provide more information on the City's website on ways to improve home energy efficiency, such as information on energy efficiency and electrification incentives from PG&E, BayREN, Peninsula Clean Energy, and others.
- Continue to review residential landscape plans for consistency with the City's Water Efficiency, Landscape and Irrigation Guidelines and Municipal Code Section 10.16, Water Conservation.
- Provide additional informational brochures about drought-resistant and low-water landscaping options in the same locations where residential building standards guidelines can be found.

METRIC:

- Increased utilization and participation in home energy efficiency programs.
- Number of new projects that include drought-resistant landscaping.

Responsibility: Community and Economic Development, Parks Department, Department of Public Works

Funding Source: General Fund

Timeframe: Within one year of next Building Standards Code Revision (every 3 years); Ongoing

Program 2-L: Maintain and expand the supply of small lots.

Conserve and expand the City's supply of small residential lots, where compatible with surrounding neighborhood character.

ACTIONS:

- Continue zoning that allows development of small, flexible parcels with a Planned Unit Permit in the Zoning Ordinance Update.
- Study opportunities to preserve and facilitate development on small residential lots throughout the city.

METRIC:

- Approve a minimum of 118 housing units at the Engvall site that utilize small lot development.
- Approve a minimum of 150 additional housing units that utilize small lot development elsewhere in the city, with a focus on higher resourced neighborhoods.

Responsibility: Community Development Department

Funding Source: Staff time

Timeframe: Ongoing



GOAL 3:	Improve the city's management of its existing affordable housing portfolio, affordable housing funds, and preserve the affordability of existing affordable housing.
----------------	---

Program 3-A: Join with other cities in San Mateo County to hire shared housing staff to implement affordable housing programs and help manage affordable housing with a focus on fair housing.

Enhance the city's ability to support and monitor housing programs.

ACTIONS:

- When opportunities arise, the City can consider participating with other jurisdictions in San Mateo County to share housing staff.

METRIC:

- Increased utilization of housing programs in the planning period.

Responsibility: Community and Economic Development

Funding Source: General Fund

Timeframe: Five years after certification

Program 3-B: Affordable Housing Fund. Develop funding priorities for the use of the Affordable Housing Fund which imposes a housing impact fee on new commercial development in the city to fund affordable housing.

ACTIONS:

- The City will identify funding priorities for affordable housing projects and programs funded by the city's AHF.
- The City will conduct proactive outreach to identify community priorities for AHF resources. Outreach will be conducted before holding City Council study sessions and meetings, and input will be included in staff reports.
- The City will issue an initial Housing Trust Fund "Notice of Funding Availability" (NOFA) for affordable housing production, rehabilitation, and/or preservation, unless the City identifies another funding priority that requires a large balance.
- Use a small percentage Affordable Housing Funds on an annual basis to support city staffing and/or outside consultants who will administer and deploy these funds in a timely, efficient, and productive manner.
- Consider allocating a portion of the Affordable Housing Fund (AHF) to administer a program for use of AHF resources. Use of AHF could include:
 - Accounting and fiscal services;
 - Interfacing with housing developers,
 - Development of funding NOFAs;
 - Evaluation of proposals and selection of awardees;
 - Loan document drafting; and
 - Evaluation of public, agency and institutional properties for potential affordable housing use.

M E T R I C :

- Increased staffing support for the administration of city housing programs in the planning period.

Responsibility: Community and Economic Development

Funding Source: Housing Trust Fund

Timeframe: Two years from certification

Program 3-C: Revise the Affordable Housing Ordinance to ensure that all new affordable housing remains affordable for 99 years or the life of the project.

State law allows jurisdictions to impose housing affordability requirements for 99 years or the life of the project. Although the City doesn't have any affordable units at risk of conversion, increasing the affordability term would prevent the loss of affordable housing in the future.

A C T I O N S :

- Research the feasibility Amend the city's Affordable Housing Ordinance to change the term from not less than 55 years for rental units and not less than 45 years for owner-occupied units to 99 years or for the life of the project.
- If feasible, amend the Affordable Housing Ordinance to include the extended term.
- If this action is deemed infeasible, the City will research affordable housing financing strategies and engage with affordable housing developers to create a financial plan to ensure that affordable units remain affordable long term.

M E T R I C :

- If directed by City Council revise the Affordable Housing Ordinance, or alternatively engage with affordable housing developers to ensure that affordable units remain affordable long term.

Responsibility: Community and Economic Development

Funding Source: General Fund

Timeframe: Three years from certification. Alternatively, create a financial plan with affordable housing developers to ensure the long-term affordability of affordable units will be completed within one year.

Program 3-D: Consider a policy to retain public land over the long term in order to support affordable housing projects on public land.

Ground leases allow the City to retain control over its land while simultaneously benefitting the community. By retaining land, the city can ensure that public land sites are used for affordable housing long-term.

A C T I O N S :

- Research the economic feasibility of the policy of doing ground leases rather than selling property for affordable housing projects on City-owned land.
- Hold a study session with City Council on how the city can increase the number of affordable housing projects long term by entering into ground leases for affordable housing projects on City-owned land.

M E T R I C :

- If directed by City Council adopt a policy to retain public land over the long term in order to support affordable housing projects on public land.



Responsibility: Community and Economic Development, City Manager

Funding Source: General Fund

Timeframe: Two years from certification

Program 3-E: Facilitate the rehabilitation of the City's existing housing stock to correct housing deficiencies, increase the useful life, and increase accessibility for all residents.

To facilitate the habitability of homeowner's homes in San Bruno and especially those owned by low-income households, the city will educate homeowners and make available financial resources to aid in the repair or rehabilitation of homes owned by lower income residents. This program will be targeted to single-family homes or condominiums in low-resource areas.

ACTIONS:

- Develop a minor home repair program that will provide life safety and accessibility repairs to low-income seniors and disabled homeowners at no cost. Funding sources may include local, regional, and/or state funds.
- The City will evaluate opportunities to create rehabilitation programs to address all housing units in need of repair in low-resource areas and to improve the overall conditions of that area.
- The City will create and distribute surveys to condominium developments with Homeowners Associations to ascertain the housing conditions and rehabilitation or accessibility needs for existing homeowners and properties.
- The city will add home maintenance education resources to its website.

METRIC:

- Number of minor home improvements projects funded through local assistance; number of homeowner improvement permits pulled; number of low-income homeowners assisted

Responsibility: Community and Economic Development, City Council

Funding Source: General Fund, CDBG

Timeframe: Survey HOAs (one year from certification); Develop new financial incentive (three years from certification); Update Website and Marketing materials (Annually)

Program 3-F: Develop a Community Benefits Expenditures Policy to prioritize affordable housing funds.

- The City anticipates revenues from approved Development and /or Community Benefit Agreements over the next eight years. City staff will study a Community Benefits Expenditures Policy that sets aside a portion of funds received through these Agreements for the development of programs that support affordable housing production once enough funds are received.

ACTIONS:

- The City will study a policy that sets aside a portion of funds received through these Agreements for the development of programs that support affordable housing production once enough funds are received.
- The City will proactively reach out to public and stakeholders on this topic. Outreach will be conducted before holding City Council study sessions and meetings, and input will be included in staff reports.
- The City will hold a study session with the City Council.

M E T R I C :

- If directed by City Council adopt a Community Benefits Expenditure Policy.

Responsibility: Community and Economic Development

Funding Source: General Fund, CBA Revenues

Timeframe: Four years of certification

Program 3-G: Preserve the affordability of existing at-risk affordable housing by requiring replacement of below market rate units lost during any construction, redevelopment, or demolition projects.

Pursuant to California Government Code Section 66300, projects that demolish existing “protected” units, or build on a site that has had “protected” units demolished in the last five years are required to replace them with a project that will include at least as many protected units as the greatest number of protected units that existed on the project site within the last five years.

A C T I O N S :

- Amend the Zoning Code to incorporate specific requirements stipulated by SB 8.

M E T R I C :

- Compliance with state law and no net loss of existing affordable housing.

Responsibility: Community and Economic Development

Funding Source: General Fund

Timeframe: Eighteen months from certification

Program 3-H: Begin a plan to preserve the City's deed restricted affordable units with restrictions that will expire in the next 5 to 10 years and develop a plan for preservation of the units to keep them affordable long term.

To facilitate the preservation of “at-risk” affordable rental units, the City will engage in the following efforts to engage affordable housing developers and make available financial resources to aid in the preservation of at-risk units.

A C T I O N S :

- Prevent low-income residents from displacement or housing-cost burden due to expiration of covenants.
- This will include proposing the use of commercial linkage fees to work with affordable housing developers to acquire properties and keep deed restrictions for the long-term.
- The City will monitor “at-risk” affordable rental units and work with nonprofits and explore available funding sources to preserve affordability.

M E T R I C :

- Public funding available for affordable housing.

Responsibility: Community and Economic Development

Funding Source: General Fund

Timeframe: Four years of certification



GOAL 4: Promote equity in housing, protect residents from displacement, and support the needs of households with low incomes or special needs. Many of these programs are based on the findings of the AFFH analysis in Chapter 4.

AFFH POLICY 1

Protect existing residents from displacement by pursuing strategies that protect residents in areas of lower or moderate opportunity and concentrated poverty and preserves housing choices and affordability.

Program 4-A: Maintain and distribute accurate information about fair housing law and policies.

- Contributing Factor: Lack of knowledge about fair housing laws by renters, landlords and property owners and lack of understanding of reasonable accommodation requirements by renters, landlords and property owners.
- Fair Housing Issue: San Bruno has a concentrated population of low-income Hispanic residents on the east side of the city.
- Fair Housing Category: Segregation/integration patterns; disparities in access to opportunities

ACTIONS:

- Research other cities to create an affirmative marketing strategy for Fair Housing information and resources.
- Include multi-lingual, especially Spanish, marketing materials and ensure bilingual interpretation services are available.
- Continue to inform realtors, builders, city staff, and the community at large about fair housing law and policies, through information posted on city's website and handouts available at City Hall and the Senior Center and other city facilities.
- Conduct proactive outreach by sharing information about fair housing laws and policies with residents and other stakeholders. Outreach will be conducted at least twice per year during the planning period and may include sharing information via newsletters, email communication, events, or social media.
- Advertise Accessibility Requirements when residential buildings are inspected for occupancy, check for posters that explain the right to request reasonable accommodations for persons with disabilities.

METRIC:

- Fewer fair housing complaints in the planning period.

Responsibility: Community and Economic Development and Building Department

Funding Source: General Fund

Timeframe: Within two years after adoption of the Housing Element; Ongoing.

Program 4-B: Partner with local fair housing organizations to perform fair housing training for landlords and tenants.

- Contributing Factor: Lack of knowledge about fair housing laws by renters, landlords and property owners. Lack of understanding of reasonable accommodation requirements by renters, landlords and property owners.
- Fair Housing Issue: All of San Bruno's fair housing complaints were on the basis of disability and a majority of San Bruno's fair housing complaints are on the basis of disability. Households of color are disproportionately impacted by displacement.
- Fair Housing Category: Outreach capacity and enforcement

ACTIONS:

- Partner with local fair housing organization to provide training for landlords and tenants at least annually.
- Promote training sessions in areas identified as lower resource areas and areas with disproportionate housing need. Ensure training is available in multiple languages.
- Promote training sessions by including the information on the City's website.
- Develop training curriculum to increase knowledge about fair housing laws and reasonable accommodation requirement and provide information to landlords on fair housing laws and reasonable accommodation.

METRIC:

- Fewer fair housing complaints in the planning period.

Responsibility: Community and Economic Development, Partners may include Project Sentinel

Funding Source: General Fund

Timeframe: Two years from certification. Contact Project Sentinel or similar organization within one year and schedule the training within two years. At a minimum one training per year will be held.

Program 4-C: Improve the landing page for housing resources on the city's webpage and add a fair housing section.

- Contributing Factor: Lack of fair housing information online. Currently fair housing resources appear in the "Tenant Information and State Assembly Bill 1482" webpage which is difficult to find and does not suggest it contains fair housing resources.
- Fair Housing Issue: Lack of information accessible online; A majority of San Bruno's fair housing complaints are on the basis of disability, indicating some landlords may not understand fair housing laws.
- Fair Housing Category: Outreach capacity and enforcement

ACTIONS:

- Update the city's website to include a robust fair housing section that is consistent with "best practices".
- Add information on the city's website to clearly define reasonable accommodations in housing in accordance with state fair housing law.
- Modify the City's webpage to include more information about reasonable accommodations.
- The City shall ensure that its website and handout materials regarding housing resources, requirements, and services for the disabled are updated annually and made available to the public.



- Conduct proactive outreach by sharing the city’s landing page with information about fair housing issues, including on reasonable accommodations, with residents and other stakeholders. Outreach will be conducted at least twice per year during the planning period and may include sharing information via newsletters, email communication, events, or social media.

M E T R I C :

- Maintain low number of fair housing complaints or receive fewer fair housing law complaints in the City of San Bruno.

Responsibility: Community and Economic Development

Funding Source: Departmental Budget

Timeframe: Within one year after adoption of the Housing Element; Ongoing

Program 4-D: Continue to adhere to state and federal fair housing and non-discrimination laws to ensure that housing opportunities are provided for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, family status, or disability. Enforce fair housing laws, with a focus on disability violations.

- Contributing Factor: Lack of information and understanding of Fair Housing laws.
- Fair Housing Issue: All of San Bruno's fair housing complaints were on the basis of disability.
- Fair Housing Category: Outreach capacity and enforcement.

A C T I O N S :

- Partner with local fair housing organization to complete a study session with City Council on fair housing laws.
- Ensure fair housing laws are adequately reflected in the Zoning Code Update, including the removal of barriers to the reasonable accommodation process.
- Clearly define reasonable accommodations in housing in the city code.

M E T R I C :

- Fewer fair housing complaints in the planning period.

Responsibility: Community and Economic Development

Funding Source: General Fund

Timeframe: Two years from certification

Program 4-E: Support legal counsel and advocacy assistance for renters and residents with disproportionate housing needs.

- Contributing Factor: Lack of information and understanding of regional Fair Housing laws.
- Fair Housing Issue: All of San Bruno's fair housing complaints were on the basis of disability.
- Fair Housing Category: Outreach capacity and enforcement.

A C T I O N S :

- Persons requesting information or assistance related to housing discrimination will be referred to one or more fair housing groups for legal services.

- Brochures providing information on fair housing and tenants' rights will be available at City Hall, public libraries and on the City's website. The brochures will also be available at nonprofit organizations serving low-income residents. The brochures will be available in multiple languages.
- As funding allows, the City shall provide annual funding assistance to non-profit organizations that provide fair housing, tenant/landlord, and habitability counseling and other general fair housing assistance.

M E T R I C :

- Reduce the number of fair housing complaints below the county average. Amount of funding provided to support renter advocacy and number of referrals to advocacy organizations.

Responsibility: Community and Economic Development

Funding Source: General Fund

Timeframe: Complete all tasks within three years of certification and then evaluate activities on an annual basis.

Program 4-F: Establish an ordinance that provides for tenant and community first right of purchase or right of first refusal (TOPA and COPA).

- Contributing Factor: Affordable housing is typically located in areas where land costs are lower and density is easier to achieve.
- Fair Housing Issue: Neighborhoods east of El Camino Real are vulnerable to displacement.
- Fair Housing Category: Disproportionate Housing Needs, Displacement.

A first right of purchase or refusal is a preemptive right which gives the right-holder a contractual right to buy the asset or real property if the owner decides to sell. Such an ordinance could help renters stay in their homes, avoiding displacement.

A C T I O N S :

- Research the feasibility of this policy including conducting outreach to stakeholders.
- Hold a study session with City Council by December 2024.
- If directed by City Council, initiate the ordinance adoption process

Conduct proactive outreach on this topic before the development of the program. Outreach will be conducted before holding City Council study sessions and meetings on the program and community input will be included in staff reports.

M E T R I C :

- Hold a study session with City Council by January 2025.
- If directed by City Council and if feasible, initiate the ordinance adoption process.

Responsibility: Community and Economic Development, City Attorney

Funding Source: General Fund

Timeframe: Three years from certification



Program 4-G: Develop a program that gives displaced residents (former residents of the jurisdiction) preferential access to new affordable housing units.

- Contributing Factor: Affordable housing is typically located in areas where land costs are lower and density is easier to achieve.
- Fair Housing Issue: Neighborhoods east of El Camino Real are vulnerable to displacement.
- Fair Housing Category: Disproportionate Housing Needs, Displacement.

In order to limit the impacts of displacement, the City will research the possibility of enacting a policy that prioritizes displaced residents for new affordable housing opportunities in the City when they become available.

ACTIONS:

- Research the legality and administration for a policy that gives displaced resident priority access to new affordable housing units in the city.
- Conduct proactive outreach on this topic before the development of the program. Outreach will be conducted before holding City Council study sessions and meetings on the program and community input will be included in staff reports.
- Develop a list of individuals who would qualify for units.
- Hold a study session with City Council and seek direction.
- When directed by City Council, initiate the ordinance adoption process.

METRIC:

- Reduce resident displacement

Responsibility: Community and Economic Development

Funding Source: Affordable Housing Fund

Timeframe: Four years from certification

Program 4-H: Identify funding and other resources to develop an anti-displacement plan for neighborhoods east of El Camino Real.

- Contributing Factor: Residents with disproportionate housing needs and high displacement risk live east of El Camino Real.
- Fair Housing Issue: Displacement.
- Fair Housing Category: Disproportionate housing needs and risk of displacement.

In order to limit the impacts of displacement in the future, the city will identify funding sources and other resources to create an anti-displacement plan for neighborhoods east of El Camino Real which are vulnerable to displacement pressures.

ACTIONS:

- Review existing displacement plans in San Mateo County cities and identify financial and other resources needed to complete an anti-displacement plan for the neighborhoods East of El Camino Real.

- Identify private and public funding sources and apply for funding to support an anti-displacement plan such as the Bay Area Planning Challenge Grant or an HCD SB2 Planning Grant.
- Identify City staff resources required to complete an anti-displacement plan.
- Identify the outreach that needs to be conducted for conducting an anti-displacement plan and develop an outreach plan including list of stakeholders and how to reach them.

M E T R I C :

- Complete at least one grant application to fund the anti-displacement plan.
- Complete an outreach strategy for an anti-displacement plan.
- If directed by City Council and if financially feasible, initiate the anti-displacement plan.

Responsibility: Community and Economic Development

Funding Source: General Fund

Timeframe: Three years from certification

Program 4-I: Evaluate and develop a local just cause for eviction ordinance to go above California's Tenant Protection Act (TPA), the state's just cause for eviction law adopted in 2019.

- Contributing Factor: Residents with disproportionate housing needs and high displacement risk live east of El Camino Real.
- Fair Housing Issue: Displacement.
- Fair Housing Category: Disproportionate housing needs and risk of displacement.

The state law explicitly authorizes cities to pass stronger local ordinances, because the state legislature intended the state law to be a floor, not a ceiling, on tenant protections.

A C T I O N S :

- As part of developing the local ordinance, the city will seek to regulate existing loopholes related to substantial remodels, bad faith Ellis Act evictions, and owner move-in evictions.
- Evaluate relocation payment requirements.
- Provide transparency in local procedures.
- Provide tenants with recourse for violations of the law.

M E T R I C :

- If directed by City Council adopt a local just cause for eviction ordinance.

Responsibility: Community and Economic Development

Funding Source: General Fund

Timeframe: Five years from certification



AFFH POLICY 2:

Improve place-based strategies to encourage community conservation and revitalization including preservation of existing affordable housing, conserving, and improving assets in areas of lower opportunity and concentrated poverty.

Program 4-J: Prioritize city capital improvement investments to address the challenges of the areas east of El Camino Real, which include areas with lower access to opportunity and disproportionate housing need

- Contributing Factor: Affordable housing is typically located in areas where land costs are lower and density is easier to achieve.
- Fair Housing Issue: Lower environmental outcomes in neighborhoods with the highest concentration of Hispanic residents and the most affordable housing.
- Fair Housing Category: Segregation/ integration patterns; disparities in access to opportunities.

ACTIONS:

- Prioritize capital projects that improve landscaping, tree plantings, parks, and pedestrian safety in lower resourced neighborhoods west of El Camino Real.

METRIC:

- Amount of City expenditures on capital improvements east of El Camino Real.

Responsibility: Community and Economic Development, Public Works

Funding Source: Departmental Budget, CIP

Timeframe: Ongoing

Program 4-K: Engage the school districts in a plan to reduce the disparities in educational outcomes among the schools that serve San Bruno.

- Contributing Factor: Students living on the east side of San Bruno face disparities in educational outcomes.
- Fair Housing Issue: Disparities in educational outcomes.
- Fair Housing Category: Access to Opportunity.

ACTIONS:

- The City will conduct outreach to school officials on how the City can support area schools.
- The City will share data and information on issues the community faces and discuss those issues in tandem to help allocate resources strategically.
- The City will focus its engagement in particular geographic areas with identified need.

METRIC:

- Two meetings per year.

Responsibility: City of San Bruno; other cities within the district; school district officials

Funding Source: General Fund

Timeframe: Two years from certification

Program 4-L: Engage developers to produce housing with amenities that can help to reduce the disparities in outcomes among the schools that serve San Bruno.

- Contributing Factor: Students living on the east side of San Bruno face disparities in educational outcomes.
- Fair Housing Issue: Disparities in educational outcomes.
- Fair Housing Category: Access to Opportunity.

ACTIONS:

- When feasible, the city will use community benefit agreements to encourage developers to include features in new developments that can help facilitate early and K-12 learning. For larger scale redevelopments, this could include reserving/offering reduced leases in community space for nonprofits who work with kids to improve educational outcomes, that offer subsidized childcare, or that offer after school activities.

METRIC:

- New development projects built with community space that can be used for educational activities and childcare or other amenities that address disparities for people with special housing needs.

Responsibility: Community and Economic Development

Funding Source: General Fund

Timeframe: Seven years from certification

AFFH POLICY 3:

Encourage new housing choices and affordability in high resource areas by promoting housing supply, choices, and affordability in areas of high opportunity and outside of areas of concentrated poverty.

Program 4-M: Encourage, facilitate, and promote home sharing opportunities throughout the city.

- Contributing Factor: Lack of affordable housing in high resource areas
- Fair Housing Issue: Concentration of Hispanic residents in lower resource areas.
- Fair Housing Category: Disproportionate housing need.

Continue to support home sharing programs and promote such programs through the Senior Center and other local agencies.

ACTIONS:

- Continue to support the Housing Investment Partnership (HIP) Home Sharing program, which facilitates living arrangements among two or more unrelated people. Homeowners or renters (Home Providers) who have a residence with one or more bedrooms are matched with persons seeking housing (Home Seekers). People who home share include seniors, working persons, low and extremely low-



income residents, students, persons with disabilities (including developmental), families, veterans, emancipated foster youth and others.

- Update the city’s website to promote home sharing opportunities throughout the city.
- Continue to consider appropriation of monies for support of various organizations during annual budget review. (City allocated annual grant of \$30,000 to HIP)
- Conduct proactive outreach by sharing information about home sharing resources with residents and other stakeholders. Outreach will be conducted at least twice per year during the planning period and may include sharing information via newsletters, email communication, events, or social media.

M E T R I C :

- Increase community participation in home sharing programs.

Responsibility: Community and Economic Development

Funding Source: Affordable Housing Fund

Timeframe: Ongoing

Program 4-N: Continue to participate in San Mateo County Housing Authority’s Housing Choices Voucher program (formerly the federal Section 8 program).

- Contributing Factor: Lack of affordable housing in high resource areas
- Fair Housing Issue: Concentration of Hispanic residents in lower resource areas.
- Fair Housing Category: Disproportionate housing need.

Continue to participate in CDBG cooperative agreement with San Mateo County Housing Authority’s housing Choices Voucher program Voucher program (formerly Section 8).

A C T I O N S :

- Encourage new housing developers to participate in the Housing Choices Voucher program during preparation of future development agreements/affordable housing programs.
- Publicize availability of this program to residents through the city’s website and promote this program as a way of providing a mix of affordable and market rate units.
- Follow up with owners who have opted to participate in the Housing Choices Vouchers program to ensure a “good faith effort” by participating apartment owners to advertise available units and that they are being listed on the Housing Choices Voucher vacancy list.

M E T R I C :

- Increase community participation in the Housing Choices Voucher program.

Responsibility: Community and Economic Development

Funding Sources: County Housing Voucher Program

Timeframe: Ongoing

Program 4-O: Establish an affordable unit set-aside for tenants with physical or developmental needs.

- Contributing Factor: Lack of housing for people with disabilities who tend to have extremely low incomes.

- Fair Housing Issue: Concentration of people with disabilities in one area of the city.
- Fair Housing Category: Disproportionate housing need.

Residents with a disability find it more difficult to find appropriate housing in the city.

ACTIONS:

- Recommend requiring a subset of units within affordable housing development projects for people with disabilities or alternatively for all citywide housing development projects to provide 10 percent accessible units for households with persons with disabilities.
- The City will conduct proactive outreach to stakeholders about this program. Outreach will be conducted before holding City Council study sessions and meetings and community input will be included in staff reports.
- If the recommendation find it is feasible to establish an affordable unit set-aside for tenants with physical or developmental disabilities, develop an implementation program for consideration by City Council.

METRIC:

- Goal of creating five housing units for people with disabilities during the planning period.

Responsibility: Community and Economic Development

Funding Sources: Developer Funded

Timeframe: The research will be completed three years from certification and the recommendations will be completed five years from certification.

Program 4-P: Increase the number of affordable rental and homeownership units in higher resource areas of San Bruno through targeted redevelopment and infill.

- Contributing Factor: Lack of affordable housing in high resource areas.
- Fair Housing Issue: Concentration of Hispanic residents in lower resource areas.
- Fair Housing Category: Disproportionate housing need.

Accessory dwelling units (ADUs) can offer an additional source of affordable housing to homeowners and the community. The City last updated its ADU ordinance in March 2021 and now has an up-to-date ordinance considered compliant with State Government Code Section 65852.2.

ACTIONS:

- Continue to inform homeowners about the Accessory Dwelling Unit Ordinance which permits second units by-right on appropriate residential sites.
- Promote the Accessory Dwelling Unit Ordinance. Conduct proactive outreach by sharing information about ADU resources with residents and other stakeholders. Outreach will be conducted at least twice per year during the planning period and may include sharing information via newsletters, email communication, events, or social media
- Continuing to implement a public information and proactive outreach campaign via the city's website to encourage residents to construct ADUs, inform property owners of the standards for ADU development, permitting procedures, construction resources, and the importance of ADUs, including ADUs affordable to lower-income households. Outreach will be conducted at least semiannually.



- Promote the construction of ADUs in high resource areas and areas of concentrated affluence by supplying informational materials in community gathering places such as high-resource areas or mailers to residents of high-resource areas. The city has submitted its ADU ordinance to the State for review. Should HCD require revisions to the ordinance, the ordinance will be modified to comply within one year upon receipt of the comments. Encourage ADUs in new single-family subdivisions to accommodate multi-generational and other housing needs.
- Promote pre-approved ADU plans developed by Housing Endowment and Regional Trust of San Mateo County (HEART), a non-profit corporation that seeks to increase housing in the county.
- Continue to monitor state laws regarding accessory dwelling units and amend the City's ordinance as needed.

M E T R I C :

- Goal of issuing building permits for 30 accessory dwelling units per year.

Responsibility: Community and Economic Development

Funding Source: General Fund

Timeframe: Ongoing

Program 4-Q: Participate in a regional down payment assistance program.

- Contributing Factor: Lack of affordable housing in high resource areas.
- Fair Housing Issue: Concentration of Hispanic residents in lower resource areas.
- Fair Housing Category: Disproportionate housing need.

A C T I O N S :

- Establish a regional partnership with HEART.
- Include affirmative marketing to households with disproportionate housing needs including Hispanic households, persons with disabilities, and single parents (e.g., Spanish and English, targeted to neighborhoods east of El Camino Real).
- Conduct homebuyer education quarterly in partnership with HEART.

M E T R I C :

- Number of San Bruno residents participating in regional down payment assistance program.

Responsibility: Community and Economic Development and HEART

Funding Source: General Fund

Timeframe: Every three years and within three years of certification.

Responsibility: Community and Economic Development

Funding Source: General Fund

Timeframe: Ongoing

Program 4-R: Marketing Plan for Accessible Units.

- Contributing Factor: Lack of housing for people with disabilities who tend to have extremely low incomes.

- Fair Housing Issue: Concentration of people with disabilities in one area of the city.
- Fair Housing Category: Disproportionate housing need.

ACTIONS:

- As a condition of entitlement approval, the city shall require that a housing developer implement an affirmative marketing plan for physically accessible units included in the project which will provide disability-serving organizations adequate prior notice of the availability of the accessible units and a process for supporting people with qualifying disabilities to apply.

METRIC:

- Number of housing development applications received with accessible units.

Responsibility: Community and Economic Development

Funding Source: General Fund

Timeframe: Ongoing with each entitlement application

Program 4-S: Support social services for housing and homeless prevention and shall work with homeless service providers to prioritize legal help, housing assistance, and other social services for unhoused families in San Bruno.

- Contributing Factor: Lack of housing for people with extremely low incomes which are also people with disproportionate housing needs.
- Fair Housing Issue: Concentration of low-income people with disproportionate housing needs east of El Camino Real; Vulnerability to displacement in neighborhoods east of El Camino Real.
- Fair Housing Category: Disproportionate housing need.

ACTIONS:

- The City shall support non-profits, such as LifeMoves, that offer housing solutions and services for homeless: The City shall support with staff expertise and funding, as available, for non-profit organizations that offer solutions to solving homelessness and/or provide housing related services for the homeless or at-risk homeless.
- The city shall support Continuum of Care planning: The City shall be an active participant in the Continuum of Care planning process and support its efforts to address the needs San Bruno residents in need of emergency shelter or temporary housing by attending at least $\frac{3}{4}$ of all meetings during a calendar year.
- The city shall provide referrals to the YMCA Community Resource Center (San Mateo County Core Services Agency) helping families with social services for housing and homeless prevention.
- The city shall provide referrals to Veterans and their immediate families that are homeless or at risk of homelessness. Resources for referrals include the Veteran's Administration (VA) National Call Center of Homeless Veterans at 1-877-4AID-VET and to the HUD-VASH program that is a joint effort between the Department of Housing and Urban Development and the VA Supportive Housing (HUD-VASH) Program to move Veterans and their families out of homelessness and into permanent housing through a voucher program that allows homeless Veterans to rent privately owned housing.
- The City will annually review, and amend as necessary, the Municipal Code to ensure consistency with Government Code Section 65583(a)(4)(A)(ii).



M E T R I C :

- Reduction of the Point in Time homeless count in the City of San Bruno over the planning period.

Responsibility: Community and Economic Development

Funding Source: General Fund

Timeframe: Ongoing

Program 4-T: Facilitate noise insulation retrofits. Continue to pursue funding for noise insulation from the San Francisco International Airport and educate residents about program benefits.

A C T I O N S :

- Continue to seek funds through the Federal Aviation Administration's Aircraft Noise Insulation Program.
- Educate targeted homeowners on the benefits of participation in the program.
- Provide technical assistance necessary to help qualifying homeowners apply for the funding and implement the insulation retrofits.

M E T R I C :

- Facilitate the upgrading of 100 existing homes in the city that still qualify for the program.

Responsibility: Community and Economic Development

Funding Source: Federal Aviation Administration's Aircraft Noise Insulation Program

Timeframe: Ongoing

This page intentionally blank



Appendix A

Previous Cycle

Housing Element Accomplishments

Appendix A Detailed Program Accomplishments During Last Cycle 2015-2021

The California Department of Housing and Community Development requires that each housing element review the effectiveness of the prior housing element specifically its goals, policies and programs, describe progress in implementation, and analyze the appropriateness of these measures i.e. whether and how these policies, programs should continue. This appendix assesses the achievements of the 2015 Housing Element in accordance with State housing law. These results are quantified where appropriate and compared to what was projected in the 2015 Housing Element. This evaluation provided a basis for the new Housing Element policies as successful programs were retained and/or expanded while unsuccessful programs were discarded or revised. Specific implementation and responsible agencies were identified in the revised Housing Programs (see Chapter 3).

GOAL 1: Protect the quality and stability of existing neighborhoods through the conservation, rehabilitation, and improvement of the existing housing supply. (GC 65583(c)(4))

Program 1-A: Support infrastructure upgrades.

Continue to seek funding to upgrade and maintain infrastructure needed by San Bruno's housing stock.

Actions

- Identify funding sources necessary for infrastructure improvements on a project-by-project basis. Funding sources may include gas tax, CDBG, etc.
- Develop a development impact fee to finance the upgrade and maintenance of infrastructure related to new residential and commercial development in the Transit Corridors plan area as a condition of project approval.
- Continue to incorporate infrastructure requirements in the fee structure for development proposals.
- Implement upgrades and maintenance through the City's Capital Improvement Program.

Responsibility: Community Development Dept, Public Works Dept

Funding Source: Staff time, Gas Tax, Measure A, grants (e.g., C/CAG TOD-HIP), development fees

Timeframe: Ongoing

Implementation

- The City adopted development impact fees in 2000 to help fund infrastructure improvements.
- The City made several pedestrian safety improvements along San Bruno Ave. and replaced water and sewer mains in the Glenview neighborhoods. Benefitting the neighborhoods east of the Calino Road.
- The water and sewer mains along San Mateo Ave. were replaced.
- However, the infrastructure upgrades weren't always done in areas that benefit new development, leading developers to do additional infrastructure upgrades.

Has the program been successful? Besides infrastructure upgrades should be more targeted if possible to benefit the development anticipated in the sites in Centor which are mostly located in the TC specific plan area. This program will be continued but modified to address this shortcoming.

Program 1-B: Maintain and expand the supply of small lots.

Conserve and expand the city's supply of small residential lots, where compatible with surrounding neighborhood character.

Actions

- Continue zoning that allows development on small flexible parcels with a planned unit permit in the zoning Ordinance code.
- Study opportunities to preserve and facilitate development on small residential lots throughout the City

Responsibility: Community Development Dept

Funding Source: Staff time

Timeframe: Within 2 years of Housing Element adoption, Measure A, grants (e.g., C/CAG TOD-HIP), development fees

Timeframe: Ongoing

Implementation

- The City approved two residential subdivision projects which utilized small lot development with reduced setbacks. Port housing units were approved at Spline Ridge and 20 housing units were approved at Glenview Terrace. Where the Code requires a minimum lot size of 5,000 sq. ft. the average for these projects was 1,500 sq. ft. a 70% reduction in lot size which allowed each project to achieve the maximum dwelling unit density permitted under the General Plan for the land use designation.

Has the program been successful? This program has been successful. Small lot development allows more housing to be built on a low-density development site because maximum density can rarely be achieved in a low-density residential subdivision with a 5,000 sq. ft. minimum lot size.

Program 1-C: Conserve and facilitate legalization of second units in R-1 and R-2 zones.

Continue to regulate excess housekeeping units in R-1 and R-2 zones that were constructed prior to the 2000s and that met the California Building Code at time of construction.

Actions

- Continue to provide informational handouts to inform residents how to regulate second units in R-1 and R-2 zones at the Planning Department and the Public Library.
- Create a program to regulate second units constructed between 1990 and 2000 including associated existing barriers such as parking standards.
- Update application materials for excess housekeeping units to improve clarity.
- Aim to facilitate construction and/or legalization of second units at a rate of one per year, slightly above the recorded annual average from the prior Housing Element cycle due to the likelihood that second units are more attractive in a strong economy. Second units are assessed to qualify for the lower income category.

Responsibility: Community Development Dept

Funding Source: Staff time

Timeframe: Within 2 years after adoption of the Housing Element

Implementation

- Second units became accessory dwelling units (ADUs) during the planning period. With changes to state law, the city was successful in promoting and approving accessory dwelling units, approving 6 in 2021. ADUs will continue to be a strategy for the city to meet its RH requirements for the next planning cycle.

Has the program been successful? Through the code enforcement process, the city continues to recommend legalization of accessory living spaces where feasible and where fire safety considerations are not an impediment. Though a formal legalization program was never created, the program has been successful overall. However, it will not be continued because it is outdated and superseded by changes to state ADU law that provide more flexible development standards.

Program 1-D: Pursue and promote resources for preservation and rehabilitation.

Coordinate Federal, State and local resources both financial and programmatic to assist homeowners in preventative maintenance and to preserve and rehabilitate the City's existing housing stock.

Actions

- Continue to work with the San Mateo County Department of Housing Residential Rehabilitation Program including providing referrals during Code enforcement.
- Continue to maintain a comprehensive list of available resources and publicize through the City's Resource Guide, flyers, cable TV, newspaper, the Focus newsletter, and the City's website. Ensure the Resource Guide contains details on who to contact for more information on each program or resource.
- Promote local non-profit agencies that assist low-income homeowners with housing repairs.
- Explore opportunities to create a City-sponsored program to assist homeowners with rehabilitation and preventative maintenance, including potential funding from the City's BMR Housing Initiative Fund.

Responsibility: Community Development Dept

Funding Source: Staff time

Timeframe: Ongoing

Implementation

- Due to lack of resources the city did not implement this program.

Has the program been successful? This program was not implemented but a version of it has been added to the 2020-2022 program's see program 100.

Program 1-E: Ensure replacement housing.

Develop a comprehensive program to replace housing throughout the City to accommodate a growing population.

Actions

- Amend the Zoning Ordinance to require replacement of demolished single-family housing units in all areas of the city.
- Require replacement equal to or more than the number of single-family units destroyed on the site.

Responsibility: Community Development Dept

Funding Source: Staff time

Timeframe: Within 1 year after adoption of the Housing Element

Implementation

- Though the city did not amend the Zoning Ordinance it did not approve any projects requiring the replacement of housing that was not replaced.

Has the program been successful? This program was not implemented but will be retained and updated for the 2024-2028 program update. The city will update its ordinance to require replacement of housing that is lost through demolition.

Program 1-F: Improve legally non-conforming residential uses.

Work to facilitate improvement and expansion of existing legally non-conforming residential uses in compliance with adjacent uses.

Actions

- Review City policies to determine whether they can currently accommodate the demolition and reconstruction of existing substandard non-conforming structures with the same non-conforming number of units.
- Clarify permissible reconstruction/expansion of non-conforming uses in the Zoning Ordinance code.
- Create an informational handout and provide public outreach to property owners with structures that fall into this category.

Responsibility: Community Development Dept

Funding Source: Staff time

Timeframe: Within 1 year after adoption of the Housing Element

Implementation

- This program was not completed due to lack of resources.

Has the program been successful? n/a

Program 1-G: Support historic preservation.

Support preservation and reuse of properties with historic character.

Actions

- Preserve historic structures and resources during reuse and intensification within the city's older neighborhoods. (General Plan Policy RC10)
- Implement rehabilitation, renovation, or reuse of historic resources in coordination with the standards of the Secretary of the Interior and the Office of Historic Preservation. (General Plan Policy RC16)
- Provide technical assistance to property owners in determining appropriate rehabilitation techniques for historic properties including providing referrals to the San Mateo County Historic Society.
- Continue to use the 200 Historic Resources Survey to guide decisions about preservation and reuse of historic properties.
- Continue to use historic resources consultants as necessary for reviewing planning applications.
- Consult the Residential Design Guidelines as necessary during project review.

Responsibility: Community Development Dept

Funding Source: Staff time

Timeframe: Ongoing

Implementation

- The city did not receive any historic preservation projects during the 2015-2020 planning cycle, which indicates there isn't much of a need for this type of work. The city requires a historic resource evaluation for a major alteration and demolition of properties that are 50 years old or more.

Has the program been successful? This program was not successful and will be re-evaluated.

Program 1-H: Allow fee waivers for affordable rehabilitation.

Waive permit fees for affordable housing rehabilitation achieved through the Community Development Block Grant (CDBG) program as well as through other San Mateo County programs or through non-profit agencies.

Options

- Continue to waive permit fees for housing rehabilitation conducted through CDBG as well as through other San Mateo County or non-profit agencies.
- Consider amending Master Fee Schedule to reflect this policy.
- Continue to allow Master Fee Schedule fees to be waived by City Council based on need for and project including affordable projects.

Responsibility: Community Development Dept, City Council

Funding Source: Staff time

Timeframe: Ongoing

Implementation

- The city did not receive any projects that proposed housing rehabilitation using Community Development Block Grant (CDBG) funds or through other San Mateo County programs or through non-profit agencies.

Has the program been successful? This program was not successful because it was not implemented due to lack of resources. The city is not in a fiscal position to grant fee waivers and will therefore continue to deny fee waivers and deferrals required per state law.

Program 1-I: Continue lead-based paint abatement.

Provide information on local lead-based paint abatement programs to ensure safe and healthy living environments for all residents.

Actions

- Display and distribute informational handouts on local lead-based paint abatement programs at City Hall and the public library.
- Provide information on local lead-based paint abatement programs on the City website.

Responsibility: Community Development Dept

Funding Source: Staff time

Timeframe: Ongoing

Implementation

- The City will continue to provide lead-based paint abatement information on its website.

Has the program been successful? This program will be re-evaluated because it has been completed.

Program 1-J: Ensure renovations are compatible with neighborhood character.

Maintain design standards to ensure that residential additions and renovations are compatible with overall neighborhood character. See Program 2 regarding new housing development.

Actions

- Review and update the zoning Ordinance to ensure that design standards applicable to residential additions and renovations are based on the Residential Design Guidelines.
- Require applications for residential additions and renovations to comply with standards set forth in the Residential Design Guidelines.
- Prepare informational handouts on the Residential Design Guidelines.
- Amend Guidelines as necessary to ensure they clearly reflect neighborhood character goals.

Responsibility: Community Development Dept, Planning Commission

Funding Source: Staff time

Timeframe: Within 1 year after adoption of the Housing Element

Implementation

- The City reviews all residential projects for compliance with the Residential Design Guidelines.
- The Residential Design Guidelines are accessible to the public on the Community and Economic Development Department's webpage.

Has the program been successful? The success of the program is its Residential Design Guidelines to all residential projects in low-density residential districts. Objective design guidelines are needed for all residential projects. Program has been added for the City to develop objective design standards.

GOAL 2: Accommodate regional housing needs through a community-wide variety of residential uses by size, type, tenure, affordability, and location. (GC 65583(c)(1))

Program 2-A: Update the Zoning Ordinance to make available adequate sites to accommodate San Bruno's share of regional housing need.

Revises the Zoning Ordinance to reflect the San Bruno 2025 General Plan and Transit Corridors Plan (2015) including land use designations allowing mixed-use development.

Actions

- Update the Zoning Ordinance to create Mixed Use and Multi Use-Residential Local Zoning districts with a minimum density of 20 units per acre that promote high intensity mixed-use development including retail, office, services and housing to provide adequate sites to meet San Bruno's RHNA. Limit retail development along El Camino Real to those sites north of Crisita Springs Road that's reinforcing the existing retail activity in Downtown.
- Allow residential uses by right without a conditional use permit or planned development permit or other discretionary action in Mixed Use and Multi Use Residential Local Zoning districts consistent with Section 65502.2 of the California Code of Regulations.
- Update the Zoning Map to match the designations indicated in General Plan and TCO.
- In the interim before the Zoning Ordinance is updated encourage and facilitate appropriate projects that adhere to the General Plan and TCO land uses and densities/intensities.
- Ensure that Zoning Ordinance amendment to rezone sites from nonresidential use to residential use is in accordance with Section 65502.2 of the California Government Code as amended by SB 600 and SB 5.
- Treat agricultural related employee housing including accommodation for six or fewer employees the same as a single-family structure within a residential zoning district in accordance with Health and Safety Code Section 170205.

Responsibility: Community Development Dept

Funding Source: Staff time

Timeframe: Within 3 years after adoption of the Housing Element

Implementation:

- The City updated its Zoning Ordinance in March 2020 to implement the Transit Corridors Plan replacing commercial district zoning with the TOD zoning district and allowing it possible to construct the 600 housing units envisioned in the TCO.
- Since the update the city has experienced an increase in development applications for multifamily residential projects within the plan area.
- Several housing projects were entitled within the TCO during the development of the entitlements too longer than if the zoning had already been in place.

Has the program been successful? Including applications the city has entitled 55 housing units within the TCO. The program will not be retained because the rezoning has been completed.

Program 2-B: Transit Corridors Plan Implementation.

Develop strategies to implement the adopted Transit Corridors Plan with the goal amongst others to increase residential options in Downtown and transit corridors in the vicinity of the San Bruno Center Caltrain Station completed in 2011.

Actions

- Promote new or different housing products or arrangements (e.g., shared housing, co-housing, etc.) that better meet current housing needs in the TC area.
- Organize a working group of staff from various City Departments to review and propose strategies to carry out the implementation action plan recommended in the TC including infrastructure upgrades to accommodate new residential development.
- Develop a program to accomplish implementation actions in the adopted Transit Corridors Plan with the goal amongst others to increase residential options in Downtown and transit corridors in the vicinity of the San Bruno Center Caltrain Station.
- Provide information materials on the TC development standards and design guidelines on the City website and handout materials.

Responsibility: Community Development Dept

Funding Source: Staff time

Timeframe: Within 1 year after adoption of the Housing Element

Implementation:

- The city adopted the Transit Corridors Plan in 2011 and is now seeing it translate into the implementation phase of the plan.

Has the program been successful? In the early years after plan adoption the TC was not that successful because the zoning had not yet been updated. In 2021 the city updated the zoning to allow it to implement the plan and there has been a lot of development interest since. This program will not be retained because TC implementation would benefit most from objective design standards.

Program 2-C: Support identified housing opportunities.

Work with property owners and the community to support and encourage the redevelopment of identified opportunity sites into mixed uses with affordable housing components.

Actions

- Actively engage the community about options to redevelop the proposed housing opportunity sites listed in Table 1.1 and shown in Figure 1.1.
- Prioritize review of redevelopment proposals and permitting processes for identified housing opportunity sites.

Responsibility: Community Development Dept

Funding Source: Staff time

Timeframe: Ongoing

Implementation:

- After plan adoption, the city met with regional developers to champion the TC's redevelopment opportunities and facilitate coordination among property owners. However, sites that required several lots to be consolidated proved difficult to achieve.

Has the program been successful? The TC is now one of several areas in the city anticipated for growth. Therefore, this program will be retained and broadened to promote the entire sites in Centennial properties (see Program 2).

Program 2-D: Reuse former school sites.

Facilitate the reuse of former school sites to accommodate affordable housing.

Actions

- Work with the School District regarding the following reusable school sites designated low density residential in the General Plan to encourage the development of a variety of housing types to address the needs of all incomes. Densities shall be compatible with the surrounding uses consistent with available service capacities and environmental constraints and in accordance with existing City ordinances.
 - Willard Elementary School site
 - Crestmoor High School site
 - Edgemont School site
- Allow the redevelopment of the Crestmoor site to utilize clustering of new housing units to facilitate the preservation of open space and landscape grounds according to General Plan Policy OSR-11 while not reducing the overall number of units achievable on the site.
- Work with the School District to increase access to information on how their low density residential sites can be suitable for affordable housing development.
- Initiate a dialog with affordable housing developers about what kind of partnerships and financial leverage would be necessary to reuse the school sites in a profitable way for the District and the developers.

Responsibility: Community Development Dept, San Bruno Park School District, San Mateo Unified High School District

Funding Source: Staff time

Timeframe: Initiate actions within 2 years after adoption of the Housing Element

Implementation:

- The city is in the process of working with applicants to develop the Willard Elementary and Crestmoor High School sites.
- Preliminary plans indicate development on the sites will be clustered with some lots similar to other more recent residential subdivision projects.

Has the program been successful? Two of the three school district properties mentioned in this program have been sold or are under contract to private developers and have applications for redevelopment under review by the city. Edgemont is the only school site that remains under district control. This program will not be retained since projects are under review.

*** Program 2-E: Consolidate Lots.**

Use City funds to facilitate lot consolidation in support of the redevelopment of housing opportunities sites with affordable housing.

Actions

- Starting with the Housing Opportunities Sites cited in Program 2-C, work with property owners to facilitate consolidation of adjacent parcels.
- Ensure that the Zoning Ordinance update implements the General and Transit Corridors plan density and intensity standards (General Plan Table 2) which allow fixed use redevelopment density/intensity to increase with the size of the redevelopment site.

Responsibility: Community Development Dept

Funding Source: Staff time

Timeframe: Within 2 years after adoption of the Housing Element

Implementation:

- The city worked with the developers of Mills Park and San Bruno Cde. to consolidate adjacent lots to produce more substantial projects with increased housing density.
- The 2021 Zoning Ordinance update implemented the density and intensity standards of the General and Transit Corridors plan allowing limited R for lots 20,000 square feet or more.

Has the program been successful? Lot consolidation is an important mechanism for ensuring housing opportunities sites in the interior can achieve limited housing density. Therefore, this program will be retained and incorporated into Program 2-B.

Program 2-F: Ensure compatibility of new housing with neighborhood character.

Use Residential Design Guidelines and Transit Corridors Urban Design Guidelines to ensure that new housing development proposals are compatible with existing neighborhood character. See program regarding additions and renovations to existing homes.

Options

- Use the new Transit Corridors Urban Design Guidelines to ensure that new housing development proposals are compatible with existing neighborhood character. Require applications for new multifamily residential and mixed-use development in the TC area to comply with the design guidelines, development standards and Mixed Use to Residential Transition Measures set forth in the TC.
- Require applications for new single-family housing to comply with the standards set forth in the Residential Design Guidelines to ensure that the design, scale and buffering retains existing neighborhood character.
- Require applications for new multifamily residential and mixed-use development in Transit Corridors Urban area to comply with the design guidelines, development standards and Mixed Use to Residential Transition Measures set forth in the Transit Corridors Urban.
- Develop design standards during the zoning Ordinance update for new multifamily residential projects in RRR and new General Urban multifamily residential districts to ensure compatibility of design and scale with surrounding uses.
- Use the development standards and processing procedures within the Residential Design Guidelines and Transit Corridors Urban Design Guidelines to increase applicant certainty and periodically evaluate the implementation of the guidelines to ensure they do not unduly constrain residential development.

Responsibility: Community Development Dept

Funding Source: Staff time

Timeframe: Ongoing, within one year after adoption of the Housing Element

Implementation:

- The city applies the Residential Design Guidelines and Transit Corridors Urban Design Guidelines to all projects within these districts to ensure neighborhood compatibility.
- Prior to application submission the city encourages dialogue to ensure submissions are reflect staff guidance regarding the guidelines.

Has the program been successful? Objective design guidelines are needed to facilitate the review process for multifamily dwellings. This program will be revised to apply to objective design standards, see program 1-D.

*** Program 2-G: Provide senior housing for a range of income levels.**

Identify opportunities for the creation of affordable units for seniors who do not qualify for deed restricted units due to equity in their current homes.

Actions

- Encourage the development of affordable and for-sale units close to transit and services especially in the Transit Corridors or an area which would attract and be affordable to seniors on fixed incomes.
- Encourage developers to market "senior" units mixed with family units.
- Work with the Senior Center, R and others to educate seniors about affordable housing options as they become available.

Responsibility: Community Development Dept

Funding Source: Staff time

Timeframe: Ongoing

Implementation:

- The City advertises home sharing opportunities through the Senior Center and encourages developers to include housing units on parking sites but it is unclear to what extent these efforts have assisted senior residents.

Has the program been successful? This program will not be retained because it is difficult to track its effectiveness. However, the City will continue to advertise home sharing opportunities.

*** Program 2-H: Encourage moderate-income for-sale housing.**

Encourage moderate-income for-sale housing within the Multi-use Residential Area along the Casino Road.

Options

- Notify the development community about the City's desire for more moderately-priced for-sale housing along the transit corridors, potential in the for office and industrial condominiums.
- During project review, discuss with developers options for using density bonuses and smaller unit sizes to increase affordability while maintaining building quality and amenities.
- Consider reduction of parking requirements as outlined in program 11.

Responsibility: Community Development Dept

Funding Source: Staff time

Timeframe: Ongoing

Implementation:

- In 2020, the city approved 200 units of Casino Road within the MXR District, a proposed 200 units of units, eight of which would be larger for-sale units.
- During resubmittal discussions with applicants, the city references the density bonus ordinance and as a result has for projects under review that are proposing to exercise density bonus provisions.

Has the program been successful? Moderate-income households find it less difficult to find stable housing than do low- and very low-income households. This program will not be retained so more emphasis can be placed on those households who find it harder to find housing.

Program 2-I: Provide affordable housing education.

DeeDee and I implement an ongoing voter education program to inform residents of the need for affordable housing and ways the electorate can support its development.

Actions

- DeeDee a voter education program addressing provision of affordable housing. Potential media to be used include news paper articles, bulletins and informational handouts, cable television, community unit workshops, the local news letter and the City website.
- In the voter education program highlight The Crossing site as an example of successful affordable housing production using voter approved increased building heights.

Responsibility: Community Development Dept

Funding Source: Staff time

Timeframe: Within 2 years after adoption of the Housing Element

Implementation:

- This program was not completed due to lack of resources.

Has the program been successful? This program will not be retained because most residents understand the need for affordable housing. Instead the City must focus its efforts on providing resources and access to affordable housing for those who need it.

Program 2-J: Conduct annual performance evaluations and ensure consistency with the General Plan and Transit Corridors Plan.

During annual review of the General Plan monitor evaluate and document housing program performance and consistency with General Plan goals and policies.

Actions

- Annually review and evaluate implementation of housing programs. This can be facilitated through the draft annual performance report provided by the California Department of Housing and Community Development.
- Use the annual review as an opportunity to meet with Code Enforcement staff to discuss the overall condition of the housing stock and any particular concerns that may arise.
- If an inconsistency is identified between a General Plan policy or goal and a Housing element program or action, City Staff will prepare and propose a prioritized list of possible remedies to the Planning Commission for consideration. If City Council action is necessary, the will be notified of Planning Commission and Staff recommendations prior to taking action.

Responsibility: Community Development Dept

Funding Source: Staff time

Timeframe: Ongoing

Implementation:

- The city updated its zoning code in 2021 to fully incorporate the TCP's development standards and establish the TOD zoning district.

Has the program been successful? This program will not be retained because it was addressed when the zoning code was updated to incorporate the TCP development standards.

GOAL 3: Expand the variety of construction and financing techniques available to achieve new affordable housing and maintain it over time. (GC 65583(c)(2))

Program 3-A: Publicize affordable housing financing strategies.

Publicize the various financing strategies for development and expansion of affordable housing options.

- Standard and publicize available financing strategies (see descriptions in policies below) for the development of new affordable housing. Inform property owners and local non-profit and institutional groups of available resources through brochures, letters in multi-unit buildings, cable TV, newspapers, and the City's Focus newsletter.
- Coordinate and build relationships with affordable housing developers and advocates to raise awareness of potential financing sources.
- Develop a strategy to prioritize the use of San Bruno's BMR housing in the fees to create and preserve affordable housing in San Bruno including supporting non-profit affordable housing organizations and providing financial support to new or rehabilitated affordable housing. See also Program 5.

Responsibility: Community Development Dept

Funding Source: Staff time

Timeframe: Ongoing

Implementation

- Due to lack of resources the city did not implement this program to the extent needed.

Has the program been successful? This program will be retained (see Program 2).

Program 3-B: Support the Housing Choices Voucher Program.

Continue to participate in San Mateo County Housing Authority's Housing Choices Voucher program for the Section 8.

Actions

- Encourage new housing developers to participate in the Housing Choices voucher program during the negotiation of the development agreement for affordable housing programs.
- Promote this program as a way of providing a mix of affordable and market rate units.
- Publicize availability of this program to residents. Inform residents about the Housing Authority's application process for the Section 8 Moving to Work (MTW) program.
- Follow up with owners who have opted to participate in the Housing Choices vouchers program to ensure a "good faith effort" by participating apartment owners to advertise available units and that they are being listed on the Housing Choices voucher vacancy list.

Responsibility: Community Development Dept

Funding Source: Staff time

Timeframe: Ongoing

Implementation:

- Due to lack of resources it is unclear how successful this program has been in San Bruno.

Has the program been successful? This program is important for providing access to higher resource neighborhoods, therefore, it will be retained and revised, see program 4-N.

*** Program 3-C: Monitor compliance with financing terms.**

Ensure that units built with long-term affordability requirements are actually occupied by lower-income households. (See also Program 5)

Actions

- Maintain a list of developments with affordability covenants and check compliance with the agreement annually in conjunction with General Plan and Housing Element progress review.
- Monitor compliance of Union Bank at The Crossing which includes 100 units with affordability covenants that receive annual subsidies from the Successor Agency to the former Redevelopment Agency.
- Monitor compliance of The Village at The Crossing senior apartment units include 22 affordable units with affordable housing covenants.

Responsibility: Community Development Dept

Funding Source: Staff time

Timeframe: Ongoing

Implementation:

- The developments in the city which are subject to affordable housing requirements are required to submit yearly reports regarding their occupancy which staff reviews for compliance.

Has the program been successful? This program will be retained and incorporated into Program 1H.

Program 3-D: Promote the Mortgage Credit Certificate Program.

The City will continue to participate in and promote San Mateo County's Mortgage Credit Certificate (MCC) program for first-time homebuyers.

Actions

- Continue to advertise the availability of the program through informational handouts available at City Hall, the public library and the Senior Center and through the City website.
- Continue to encourage and promote seminars by local realtors to inform first-time homebuyers of financing options. Informational seminars are also offered by the California Dream Foundation, a non-profit organization in English and Spanish.

Responsibility: Community Development Dept

Funding Source: Staff time; Mortgage Credit Certificate Program

Timeframe: Ongoing

Implementation:

- First-time homebuyers in the city can access homebuying programs through the San Mateo County Department of Housing. However, this resource was not widely publicized.

Has the program been successful? No residents used this program to purchase a home in San Bruno during the planning period but the program is important for helping underrepresented households enter the housing market. The program will be retained and incorporated into program 2.

Program 3-E: Facilitate reasonable accommodations.

Facilitate the development, maintenance and implementation of housing for persons with disabilities by implementing Reasonable Accommodations Program.

Actions:

- The City will implement the adopted reasonable accommodations procedure that provides exception in zoning and land use for housing for persons with disabilities. This procedure is a ministerial process with initial or no processing fee subject to approval of the Community Development Director or his/her designee who would approve the following decision-making criteria.
- The request for reasonable accommodation will be used by an individual with a Disability protected under fair housing laws.
- The requested accommodation is necessary to make housing available to an individual with a disability protected under fair housing laws.
- The requested accommodation would not impose an undue financial or administrative burden on the City.
- The requested accommodation would not require a fundamental alteration in the nature of the City's land use and zoning program.
- The City will monitor service providers about the City's adopted Reasonable Accommodation Program.

Responsibility: Community Development Dept

Funding Source: Staff time

Timeframe: Within one year after adoption of the Housing Element

Implementation:

- The city updated its reasonable accommodation ordinance in 2021 in response to changes in state law.
- The city approved two reasonable accommodation requests during the planning period.

Has the program been successful? This program will be retained and revised to ensure the city's reasonable accommodation process remains consistent with state law and program goals.

Program 3-F: Accommodate manufactured housing.

Continue to permit placement of manufactured housing in single-family zones.

Options

- Permit placement of manufactured housing on permanent foundation systems in single-family zones provided that the unit is no more than ten years old on the date of application and meets federal and local standards specified in Government Code Section 65052.
- Require applications for new placement of manufactured housing to comply with standards set forth in the new Residential Design Guidelines.
- Ensure that no special restrictions on placement of manufactured housing are included in the zoning Ordinance update or the Residential Design Guidelines beyond those that apply to regular single-family construction.

Responsibility: Community Development Dept

Funding Source: Staff time

Timeframe: Within 1 year after adoption of the Housing Element

Implementation:

- The city permits placement of manufactured housing though it is not explicitly stated in either its ordinances or guidelines. Manufactured housing is subject to the same design standards as conventional built housing.
- The city did not receive a request during the planning period to permit placement of manufactured housing within a single-family district.

Has the program been successful? This program will not be retained because the city does apply the same standards to placement of manufactured housing and conventional housing.

*** Program 3-G: Permit childcare by right in residential zoning districts.**

Ensure that land use regulations consistent with allow childcare services by right in all residential zones in accordance with State law.

Actions

- In accordance with San Bruno 2025 General Plan Policy D10 and the California Child Day Care Act, revise the zoning Ordinance as necessary to ensure consistent and streamlined definitions of small and large childcare facilities.

Responsibility: Community Development Dept

Funding Source: Staff time

Timeframe: Within 1 year after adoption of the Housing Element

Implementation:

- The zoning Ordinance was updated in 2021 to allow childcare facilities as a permitted use in all residential zones. The city recently entitled two childcare centers that were made possible by the ordinance change.

Has the program been successful? This program will be re-evaluated because it has been completed.

Program 3-H: Reduce parking requirements.

Reduce parking requirements for new or reuse housing projects along transit corridors and adjacent to transit stations, as well as within the Medium Density R and High Density R zones.

Options

- Consider ways to reduce parking standards for housing near transit and units with residents with reduced ability, such as seniors and persons with disabilities, and clarify and implement reduced parking requirements in the Zoning Ordinance update.
- Update parking standards pursuant to recommendations of the Transit Corridors Plan.
- Update parking standards pursuant to Government Code 650500 affordable housing density bonus requirements.
- Consider allowing—but not mandating—"unbundled" parking as part of residential development, mandating this could create financing issues for purchase of these spaces.
- Consider updating parking standards to allow tandem parking to satisfy the parking requirement for second units, as suggested by State law (Government Code Section 65052.2). Current tandem parking is only allowed by securing a parking exception from the Planning Commission.
- Consider updating parking standards to allow tandem parking to satisfy the parking requirement in R and R zoning districts.
- Review and consider revising zoning enforcement criteria and procedures to address localized problems with street parking availability due to the use of garages for storage of personal belongings rather than cars.

Responsibility: Community Development Dept

Funding Source: Staff time

Timeframe: Within 1 year after adoption of the Housing Element

Implementation:

- The city updated its parking requirements in 2020 to reduce parking requirements for residential uses within the Transit Corridors Plan area and provide more flexibility in how parking is provided.
- The parking update reduced the parking requirement for lots proximate to transit and created a process to address parking in impacted neighborhoods.

Has the program been successful? Parking continues to be a challenge in the city even with the updates to the parking ordinance. In many instances, state law has superseded the city's requirements to give developers more flexibility in how they build their projects. This program will not be retained because it was conflated with the update to city's parking standards in 2020.

Program 3-I: Support condominium conversions, cooperatives, and other affordable housing ownership options.

Facilitate condominium conversions, limited equity cooperatives, and cooperative apartment units to ensure affordable ownership choices within the housing system.

Actions

- Facilitate each condominium, cooperative, and cooperative apartment project on its own merits.
- Consistent with the Municipal Code, continue to ensure residents of existing apartment units have the first opportunity to buy their unit in the instance of a condominium conversion.
- Coordinate with the California Association of Housing Cooperatives (CAHC), a nonprofit organization about how to attract and support cooperatives in San Bruno.
- Consider making condominium conversions subject to the City's existing Below Market Rate Housing program which provides for 5 percent of new or resale units to be affordable to low and moderate income households.

Responsibility: Community Development Dept

Funding Source: Staff time

Timeframe: Within 1 year after adoption of the Housing Element

Implementation:

- The city updated its condominium conversion standards to add a nondiscrimination requirement and add additional tenant protections but did not add a below market rate requirement for conversions.
- The city did not receive any requests for condominium conversion during the planning period.

Has the program been successful? This program will not be retained because the condominium conversion requirements have been sufficiently updated.

*** Program 3-J: Adopt an affordable housing impact fee.**

Conduct a nexus study that demonstrates the relationship between new housing or jobs and the need for affordable housing in San Bruno and determine a feasible and reasonable fee for both residential and commercial development.

Actions

- Continue to participate in the San Mateo Countywide Affordable Housing Impact Fee Nexus Study and Feasibility Study that will estimate the increase in demand for affordable housing associated with new residential and commercial development.
- Determine a feasible and reasonable impact fee for both residential and commercial development based on local conditions that will not discourage development.

Responsibility: Community Development Dept

Funding Source: Staff time

Timeframe: Within 1 year after adoption of the Housing Element

Implementation:

- In 2000 the city adopted development impact fees to partially offset the costs of public facilities and services that are needed to serve demand created by new development.
- In 2005 the city participated in a joint city nexus study through 2006 which led to the adoption of a new affordable housing ordinance to impose affordable housing impact fees in 2006.

Has the program been successful? This program has been successful as the city has collected over \$1M in affordable housing impact fees. However, the program will not be retained since it has already been implemented.

GOAL 4: Achieve energy and environmental conservation in residential design—particularly techniques that would also reduce noise impacts on housing—while maintaining the affordability of housing units. (GC 65583(b)(8))

Program 4-A: Promote energy conservation.

Continue to facilitate and encourage energy conservation programs including weatherization programs.

Actions

- Maintain an updated list of residential energy conservation opportunities, programs and funding resources. Include information about programs available through GPO, the State and the Federal government.
- Provide available information about energy conservation programs and state and federal grants at City Hall, the public library, on the City website and intermittent in utility buildings.
- Study new opportunities for providing rebates or incentives for homeowners' investments in energy-saving techniques including upgrading thermostats, insulation, windows, etc.
- Consider structuring incentives as tax credits or income tax credits funded through intergovernmental transfer assessment on property tax bills.
- Promote the California HERO program in San Bruno endorsed by the City Council on October 20, 2010 Resolution No. 2000000 to provide for the financing of renewable energy distributed generation sources, energy and water efficiency programs and electric vehicle charging infrastructure. Property owners in financing the cost of installing programs.

Responsibility: Community Development Dept

Funding Source: Staff time

Timeframe: Within 2 years after adoption of the Housing Element

Implementation

- The city provides information about energy conservation to handouts through the Building division and information on the department's website. Program partially implemented.

Has the program been successful? The city will continue to provide energy conservation information in handouts and on its website but this program will not be retained because its effectiveness was unclear.

*** Program 4-B: Support household and business participation in energy conservation and efficiency programs through PG&E and the State.**

The City of Santa Ana will work to promote and support participation in energy efficiency and conservation programs described in Chapter 2 in order to help reduce long-term housing costs for residents including low-income residents, help meet local greenhouse gas reduction targets under AB 32 and increase the sustainability of the local energy system.

Actions

- Promote programs through informational brochures made available where applicable residential building standards guidelines can be found.
- Provide links to the programs through the City website.
- Work with CH2C to identify households eligible for programs.

Responsibility: Community Development Dept

Funding Source: California Public Utilities Commission, PG&E, Staff time

Timeframe: Within one year after adoption of the Housing Element, ongoing

Implementation:

- The city provides information about energy conservation to households through the Building division and information on the department's website. Program participation is encouraged.

Has the program been successful? The city will continue to provide energy conservation information in handouts and on its website. This program will not be retained because its effectiveness was unclear.

Program 4-C: Facilitate noise insulation retrofits.

Continue to pursue funding for noise insulation for the San Francisco International Airport and educate residents about program benefits.

Actions

- Continue to seek funds through the Federal Aviation Administration's Aircraft Noise Insulation Program.
- Facilitate the upgrading of 50 existing homes in San Bruno that still lack for aircraft noise insulation retrofits.
- Educate targeted homeowners on the benefits of participation in the program.
- Provide technical assistance necessary to help waiting homeowners apply for the funding and implement the insulation retrofits.
- Encourage adoption of noise insulation standards by San Francisco International Airport to mitigate impacts from airplane takeoff and the Council threshold level for insulation from 65 CAA to 60 CAA.

Responsibility: Community Development Dept

Funding Source: Federal Aviation Administration's Aircraft Noise Insulation Program

Timeframe: Within 4 years after adoption of the Housing Element, ongoing

Implementation:

- The city continued its partnership with the San Francisco International Airport to administer the window insulation retrofit program. In total 100 homes were fitted the program during the planning period.

Has the program been successful? This program has been successful and will be retained as it prioritizes impacts the neighborhoods west of Calino Road See program map.

*** Program 4-D: Ensure adequate water and sewer service and reduce water waste.**

Work with the San Francisco Public Utilities Commission (SFPUC) and local departments to ensure that there are adequate water and sewer services for new development and affordable housing receives priority for these services and new development uses best management practices to reduce water waste.

Options

- Deliver a copy of the adopted Housing Element to the SFPUC and the Public Works Department's water and wastewater divisions within one month after adoption.
- Adopt procedures to ensure that affordable housing development is granted priority for service allocations.
- In accordance with General Plan policies RC1 through RC2 and SFPUC work with developers and residents on an ongoing basis to initiate the surface water runoff and pollution increase water conservation during construction and operation phases of new residential development and make recycled water available for appropriate uses.

Responsibility: Community Development Dept; Public Works

Funding Sources: Staff time

Timeframe: Within 1 month to 1 year after adoption of the Housing Element; ongoing

Implementation:

- The city provided a copy of the adopted Housing Element to the SFPUC after its adoption to ensure the continuation of water service.

Has the program been successful? This program will not be retained because state law now mandates this coordination through Housing Element law.

Program 4-E: Encourage drought-resistant landscaping.

Implement water conservation and drought-resistant landscaping guidelines and standards.

Actions

- Adopt standards for water conservation and drought-resistant landscaping as part of the zoning code update.
- Continue to evaluate landscape plans for residential development projects for consistency with the City's Residential Design Guidelines and Transit Corridors Plan Design Guidelines.
- Continue to review residential landscape plans for consistency with the City's Water Efficiency Landscape and Irrigation Guidelines and Municipal Code Section 20.06 Water Conservation.
- Provide informational brochures about drought-resistant and low-water landscaping options in the same locations where residential building standards guidelines can be found.

Responsibility: Community Development Dept, Parks Dept

Funding Source: Staff time

Timeframe: Within 1 year after adoption of the Housing Element; ongoing

Implementation:

- The city requires MWFO compliance for all projects that meet the threshold.

Has the program been successful? The city will continue to encourage drought-resistant landscaping but this program will not be retained because it is most superseded by MWFO requirements.

GOAL 5: Ensure the continued availability of affordable housing for very-low, low-, and moderate-income households, seniors, persons with disabilities, single-parent households, large families, and other special needs groups. (GC 65583(c)(5))

*** Program 5-A: Support the Below Market Rate Housing Ordinance.**

Through education and enforcement of the Below Market Rate Housing Ordinance adopted 2006, provide guidelines for developers to comply with the City's inclusionary housing requirements.

Actions

- In accordance with the BMR Ordinance require new residential developments with 10 or more housing units to provide a minimum of 5 percent of total housing units affordable to very-low and moderate-income households through construction donation or land and/or cash entitlement fees.
- In accordance with the BMR Ordinance require maintenance of subsidized housing units as affordable to very-low and moderate-income households for a period of at least 55 years from date of occurrence for rental units and 25 years for ownership units.
- Monitor State actions and court cases regarding validity of local inclusionary housing programs. Modify the City's BMR program as appropriate to maximize efforts to achieve affordable housing objectives in San Bruno.

Responsibility: Community Development Dept

Funding Source: Staff time

Timeframe: Once a year

Implementation

- The city was revised in 2006 to allow for rental projects. The program was revised again in 2020 to codify its reference for onsite affordable units and include provisions which incentivize units with deeper affordability.

Has the program been successful? Through this program the city was successful in entitling more than 10 deed restricted affordable housing units during the planning period. The program will be retained and revised as needed.

Program 5-B: Implement San Bruno's density bonus regulations.

Offer a density bonus of up to 15 percent and incentives or concessions based on the number of affordable units in the development and a flat density bonus of 20 percent for a senior housing in accordance with State density bonus regulations (Government Code 65950)

Actions

- Continue to meet State requirements (California Government Code 65950) for provision of density bonuses.
- Prioritize density bonus opportunities to project owners and developers at the earliest stages in redevelopment review and consultation process.
- Ensure that State density bonus zoning standards are allowed in existing density bonus projects. (See also Program 11)

Responsibility: Community Development Dept

Funding Source: Staff time

Timeframe: Within one year after adoption of the Housing Element, ongoing

Implementation:

- The city updated its density bonus ordinance in 2020 as a result it is currently reviewing for density bonus projects 2000 San Bruno Ave., 2000 San Bruno Ave., 2002000 Calino Road and 2000 San Bruno Ave. which would produce 600 dwelling units.

Has the program been successful? There have been a number of changes to state density bonus laws since the city adopted its density bonus ordinance in 2020. This program will be retained and revised to ensure continued compliance with state law (see Program 11).

*** Program 5-C: Provide financial incentives for affordable condominium conversions.**

Create incentives for condominium conversions that provide affordable housing.

Actions

- Revises regulations to offer financial incentives for lower-income condominium conversions during the zoning Ordinance update.
- Offer financial incentives for condominium conversions which include at least 20 percent low or moderate-income units or at least 15 percent lower income units.
- Distribute information on this program and zoning update through project review processes as well as through informational brochures at City Hall and the public library and on the City's website.
- Consider providing financial assistance through the City's BMR In-Lieu Fee Fund for the creation of affordable units during condominium conversions. (See program 5B)

Responsibility: Community Development Dept

Funding Source: BMR In-Lieu Fee Fund, General Fund, fee waivers, staff time

Timeframe: Within 1 year after adoption of the Housing Element

Implementation:

- Program not implemented due to lack of resources.

Has the program been successful? This program will not be retained because the city did not receive an interest in condominium conversions during the planning cycle.

Program 5-D: Provide financial assistance to facilitate affordable housing development.

Use the Below Market Rate Housing Fund to increase, improve, and preserve the community's supply of low- and moderate-income housing in San Bruno.

Actions

- Provide financial assistance where necessary and appropriate to facilitate affordable housing development, based on diligent analysis of a project's financial feasibility and desirability.
- Require an Owner participation agreement to ensure that proposed financing resources are dedicated to the construction, rehabilitation, or rental costs of affordable housing projects.
- Standardize the incorporation of monitoring coordination with Owner participation agreements within the regular project permitting and approval processes.

Responsibility: Community Development Dept, City Council

Funding Source: Staff time, BMR In-Lieu Fee Fund

Timeframe: Evaluate once a year

Implementation:

- Program not implemented due to lack of resources.

Has the program been successful? This program will be retained and incorporated into other programs now that the city has a substantial affordable housing fund. The city will develop funding priorities for the fund to see program success.

Program 5-E: Increase the supply of housing for large families.

Encourage diversity in unit size to ensure that one- and two-bedroom affordable rental housing units are provided for large families.

Actions

- Negotiate development of one- and two-bedroom units in future development agreements.
- Exclude senior housing developments from this expectation.

Responsibility: Community Development Dept, Planning Commission

Funding Source: Staff time, incentives such as fee waivers, parking reductions, etc.

Timeframe: Ongoing

Implementation:

- The city approved the multifamily project at 2000 Camino Real in 2020 which includes units designed for larger families. Additionally, the city approved the Glenview Terrace project which includes 60 below market rate for sale housing units.

Has the program been successful? The city's zoning ordinance does not mandate larger units be included in affordable housing projects but they are encouraged. This allows the developer the flexibility to determine the right unit mix for the market. This program will be retained and incorporated into program 2.G.

Program 5-F: Expedite review and waive fees for affordable housing.

Continue to expedite review and waive planning and bonding fees for developers of affordable housing and housing for seniors and persons with disabilities.

Actions

- Expedite permit review and waive planning, bonding, and license fees on projects providing housing affordable to very low and moderate income households, seniors, and persons with disabilities.
- Negotiate expedited permit review and fee waivers in future development agreements.

Responsibility: Community Development Dept, City Council

Funding Source: Staff time

Timeframe: Ongoing

Implementation:

- The city did not receive an request for fee waiver during the planning period.

Has the program been successful? Fee waivers require Council approval which sets a high bar. The city will consider fee waivers for future 200 affordable housing development agreements. This program has been incorporated into program 2.G.

Program 5-G: Modify regulations to encourage affordable housing.

Modify development regulations in specific zoning districts to encourage housing affordable to lower- and moderate-income households.

Options

- The adopted Transit Corridors plan recommends modification of development regulations appropriate for development of affordable housing in accordance with the San Bruno 2025 General Plan.
- Modify development regulations according during the zoning Ordinance update.
- Encourage the development of small-scale housing with shared lots, studio apartments, shared housing, and other similar solutions to promote high quality of life in a small space.
- See also program 11 regarding reducing parking requirements.

Responsibility: Community Development Dept

Funding Source: General fund, Staff time

Timeframe: Within 1 year after adoption of the Housing Element, ongoing

Implementation:

- The city approved two residential subdivisions (Greenview Terrace, Saffine Ridge) during the planning period which utilized small lot development.
- In 2011 the city updated its parking requirements to add more flexibility.
- In 2012 the city updated the zoning Ordinance to codify the TC development standards.

Has the program been successful? This program will be retained because it allows single-family residential subdivisions to reach their maximum dwelling unit density potential by allowing smaller lots and flexible development standards. This program will be applied to the long-term development and potential other former school sites in R districts that might be disclosed.

Program 5- H: Prevent Potential Displacement of Existing lower-income residents within San Bruno's Priority Development Area (PDA).

Anti-displacement and evaluate potential strategies to address displacement of lower income residents. Displacement might be direct caused by the redevelopment of sites with existing residential properties or indirect caused by increased market rents as an area becomes more desirable.

Actions

- Coordinate with other jurisdictions in San Mateo County under the umbrella of work to be undertaken by 2015 efforts to anti-displacement and evaluate potential strategies to address displacement of lower income residents.
- Based on this evaluation develop measures and implement programs to address housing displacement as appropriate.
- Monitor such programs annually for effectiveness and make adjustments as necessary.

Responsibility: Community Development Dept, City Council, 21 Elements

Funding Source: Staff time

Timeframe: Evaluate programs and policies and provide recommendations by the end of 2015. Provide recommendations to City Council by mid-2016. Adopt appropriate programs and policies to address displacement within 2 years of adoption of the housing element. Monitor programs and policies annually for effectiveness.

Implementation:

- Program not implemented due to lack of resources.

Has the program been successful? In 2012 the city amended its zoning ordinance in regards to condominium conversions to require greater protections for existing tenants however no other tenant protection policies were implemented. This program will be replaced by program 11G.

Program 5-I: Promote the Second Unit Ordinance.

Continue to inform homeowners about the Second Unit Ordinance which permits second units built right on appropriate residential sites.

Actions

- Inform property owners of the Second Unit Ordinance through the local news letter and other City outreach resources.
- Encourage second units in new single-family development to accommodate multi-generational and other housing needs with a goal of adding 2 second units during the planning period.
- Review development standards to create more opportunities for new 2nd units that are compatible with the neighborhood during zoning code update.

Responsibility: Community Development Dept

Funding Source: Staff time

Timeframe: Evaluate once a year

Implementation:

- The city updated its Accessory Dwelling Unit Ordinance in 2021 in response to state law and experienced a significant increase in ADU applications as a result. The city has issued 6 permits to construct ADUs so far in 2022. ADUs will be an important strategy for increasing housing opportunities in low-density residential districts, particularly in higher resource neighborhoods.

Has the program been successful? This program will be retained and revised to see program results.

Program 5-J: Explore and consider new strategies to increase affordable housing.

Given the loss of redevelopment agency and the state court decision in *Palmer v. City of Los Angeles* (2009), which invalidated San Bruno's BMR program for rental housing, the City will explore new opportunities and strategies to facilitate financing and development of affordable housing.

Actions

- Identify affordable housing strategies that could be appropriate for San Bruno such as affordable housing impact fees, commercial linkage fees, rent stabilization, just cause eviction, rededication of boomerang lands back to affordable housing, public benefit zoning, bonding for substantial rehabilitation, partnering with developers to fund and assist in facilitating affordable housing.
- Consider a policy to voluntarily set aside 20% of returned tax increment from the former redevelopment agency to be used for affordable housing, sometimes referred to as "boomerang" funds.
- Hold public workshops and meetings with the City Council, Planning Commission and residents to review and receive input on affordable housing strategies to determine whether the City should pursue the adoption of new housing programs.

Responsibility: Community Development Dept

Funding source: Staff time

Timeframe: within 2 years of Housing Element adoption

Implementation:

- The city adopted affordable housing impact and linkage fees in 2016 and to date has more than \$100 million in its affordable housing fund from fees collected from CoTabe and other developers.
- The city revised its Affordable Housing Ordinance in 2021 to strengthen its provisions for onsite affordable units. The city has 100 affordable units in entitled pipeline as a result of the onsite requirement.

Has the program been successful? This program will be revised and retained to see program progress.

GOAL 6: Support the needs of those with extremely-low incomes, including access to counseling, referrals, dispute resolution, supportive housing, and emergency shelter. (GC 65583(c)(5), SB 2)

*** Program 6-A: Promote fair housing.**

Continue to adhere to State and federal fair housing and non-discrimination laws to ensure that housing opportunities are provided for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, disability, or status.

Actions:

- Continue to inform Realtors, builders, citizens and the community at large of the fair housing law and policies through informational handouts available at City Hall and the Senior Center and through information about fair housing services on the City's website.
- Ensure fair housing laws are adequately reflected in the zoning Ordinance and include additions and revisions to definitions as necessary.
- Develop a non-discrimination policy State and federal fair housing and non-discrimination laws.

Responsibility: Community Development Dept

Funding Source: Staff time

Timeframe: Within one year after adoption of the Housing Element, ongoing

Implementation

- In 2020 the city updated its zoning ordinance to include nondiscrimination requirements in housing. However the city did not complete the outreach portion of this program due to lack of resources.

Has the program been successful? This program will be retained and revised to see new programs added and not.

Program 6-B: Support organizations that provide housing services.

Cooperate with and support organizations providing housing information, counseling and referral services and handling complaints of housing discrimination.

Actions

- Continue to provide referrals to fair housing services during Code enforcement.
- In annual budget deliberations, consider opportunities to provide financial assistance to support various organizations providing housing services for home repair, painting, case management, emergency food and shelter, crisis intervention and assistance with rent and utility bills, and to low-income homeowners.

Responsibility: Community Development Dept (Building Div), City Council

Funding Source: Staff time, General fund

Timeframe: Ongoing

Implementation:

- The city continues to provide annual funding to HLI and FHEMs.
- The city provides partners with and provides referrals to FHEMs when engaging homeless individuals during Code enforcement activities.

Has the program been successful? This program will be retained and revised as needed.

Program 6-C: Support shared housing programs.

Continue to support shared housing programs and to promote such programs through the Senior Center and other local agencies.

Actions

- Continue to support the Housing Interest Partnership/HI Housing Sharing Program which facilitates living arrangements among two or more unrelated people. Homeowners or renters who have a residence with one or more bedrooms are matched with persons seeking housing. Home Seekers people who home share include seniors, working persons, students, persons with disabilities including developmental disabilities, veterans, emancipated foster youth and others.
- Continue to consider appropriation options for support of various organizations during annual budget review. City allocated \$10,000 last year and this year to HI.

Responsibility: Community Development Dept, City Council

Funding Source: Staff time, BMR In-Lieu Fee Fund, General fund

Timeframe: Ongoing

Implementation:

- The city continued its financial support of HI Housing throughout the planning period.

Has the program been successful? Through its partnership with HI Housing, the city has helped connect residents with additional rooms with individuals in need of housing. This program will be retained and revised as needed.

Program 6-D: Accommodate city's share of emergency (homeless) shelter need.

Complete the process to amend the Zoning Ordinance to permit emergency homeless shelter facilities by right that is as a permitted use without requiring a conditional use permit to meet the City's identified need for 32 beds, in accordance with State law.

Options

- Study alternatives and conduct public meetings to designate a preferred location for an emergency shelter zone. Alternatives include the TOD area identified in the Tri-Cities Housing Element and the Mid-City Light Industrial zone.
- Both alternative locations have sufficient and reasonable available acreage (vacant or underutilized) to meet the City's identified need, including the potential for reuse or conversion of existing buildings. The TOD land use district includes 26 acres and 150 parcels and the Mid-City zone includes 5.5 acres and 15 parcels.
- Requirements are reasonable and objective development and performance standards permissible by law. Emergency shelters shall be subject to the same development standards as any other use within the identified zone except that San Bruno shall develop and adopt written objective standards in the Zoning Ordinance in accordance with SB2 that do not impede the City's ability to meet its identified need.
- Amend the Zoning Ordinance to establish new emergency shelter zoning district standards and map.
- Continue to support the 10-bed shelter run by St. Bruno's Church, and support future faith-based efforts to support emergency and transitional housing to those in need.

Responsibility: Community Development Dept

Funding Source: Staff time

Timeframe: Designate the emergency shelter zone within six months after adoption of the Housing Element. Amend the Zoning Ordinance establishing the zone

Implementation:

- The Zoning Ordinance was amended in 2015 to create the Shelter Overlay zone in the city. The ordinance was amended in 2020 and 2021 to include additional provisions.

Has the program been successful? This program was partially implemented with the update of the Zoning Code and the continued support for the emergency housing at St. Bruno's Church. The program will be modified because the city's emergency shelter zoning requires further refinement for compliance with state law. See program plan.

Program 6-E: Address identified need for extremely-low income and supportive housing.

Repeal and amend the Zoning Ordinance as appropriate to comply with state law (GC Section 65500a15) and investigate opportunities to create supportive housing units in accordance with the City's share of countywide need identified in the San Mateo County HOPE Plan.

Options

- Repeal and amend the Zoning Ordinance as appropriate to allow transitional and supportive housing uses within residential zones in accordance with state law (GC Section 65500a15)
- Partner with local or regional agencies and non-profits that specialize in supportive housing development and management to identify opportunities for the development of supportive housing in San Bruno. Supportive housing can be organized as:
 - Apartment or single-room occupancy (SRO) buildings, townhouses or single-family homes that exclude mobile homes or other mobile dwellings and/or trailers
 - Apartment or SRO buildings or townhouses that mix special needs housing with general affordable housing
 - Rent-subsidized apartments based in the open market
 - Long-term set-asides of units within privately-owned buildings.
- Work with partners to identify the range of local resources and assistance needed to facilitate the development of housing for extremely low-income households and to ensure access to specialized funding sources.
- Develop an action plan with partners which will include assisting with site identification and acquisition, providing local financial resources, streamlining entitlements and providing incentives.

Responsibility: Community Development Dept

Funding Source: Staff time, BMR In-Lieu Fee Fund, Community Development Block Grant, staff time

Timeframe: Repeal and amend the Zoning Code as appropriate within one year of adoption of the Housing Element. Repeal program at least once a year.

Implementation:

- The city's Zoning Ordinance was amended in 2021 to permit supportive housing in all zoning districts that allow housing. However due to lack of resources the city did not partner with an regional or non-profit agencies to identify opportunities for the development of supportive housing.

Has the program been successful? This program was not successful because it was not fully implemented due to lack of resources. However the program will be reevaluated and incorporated into other programs. See program 2G.

Program 6-F: Participate in regional coordination on homelessness.

Work with other cities/agencies and the County to address needs of the homeless.

Actions

- Assist homeless service providers in seeing CDBG money to support local homeless programs.
- Provide technical assistance to emergency and transitional shelter providers by finding appropriate sites within San Bruno and connecting with potential clients.

Responsibility: Community Development Dept

Funding Source: Community Development Block Grant

Timeframe: Ongoing

Implementation:

- The city continues its financial support of the Homeless Outreach Team, an organization on the Peninsula that helps homeless people find housing. Additional office staff coordinate with the Homeless Outreach Team. HOT Outreach Team provides the city with semiannual reports on their work in the city.

Has the program been successful? This program has been successful because it has helped an unhoused individuals find housing and services in the city. The program will be left and incorporated into program 6-S.

Efforts to Address Special Housing Needs

Government Code Section 65500 requires that local governments review the effectiveness of the housing element goals, policies, and related actions to meet the community's special housing needs. As shown in the Detailed Program Accomplishments During Last Cycle matrix above, the 2015-2020 Housing Element included programs that addressed senior housing needs, emergency shelters, and needs for persons with disabilities. Some of the accomplishments include:

- The city re-zoned the Sycamore College property (now known as Sycamore Ridge) and approved entitlements for 40 affordable housing units, which included onsite affordable housing units.
- The city approved an SB 35 application for 100 units housing, of which 20 will be affordable to lower income households.
- The city partnered with LifeMoves to find housing and services to help unhoused individuals find housing and services.
- The city supported in Hill Housing's home sharing program to help partner residents with available rooms with individuals in need of housing.
- The city negotiated a \$10M payment from YouTube to the City's affordable housing fund.

Appendix B

Housing Construction and Development Costs



BAIRD + DRISKELL

TO: Baird + Driskell
FROM: Century Urban, LLC
SUBJECT: San Mateo and Santa Clara Counties Development Cost & San Mateo County Unit Mix Research
DATE: April 7, 2022

Century | Urban has been engaged by Baird + Driskell to perform research on the development costs of certain residential prototypes in San Mateo and Santa Clara Counties as well as the unit mixes of residential projects delivered since 2013 in San Mateo County. The research findings shown below in Exhibits 1, 2, 3, and 4 are based on Century | Urban's recent work on other assignments as well as on third-party data sources, further detailed below, which Century | Urban considers credible but has not independently verified.

The estimated prototype project costs shown below reflect high-level averages and do not represent any specific project budget. Project costs vary by geography, topography, site conditions, finish level, entitlement and permit status, contractor type, and time among other factors. Key elements of the prototypes were provided by Baird + Driskell.

The San Mateo County unit mix results represent the data available to Century | Urban through its research and does not represent every project built in each market or market-level conclusions. However, the data does present over 100 projects and over 13,000 units and as such is informative with respect to the types and sizes of units built during the period surveyed.

With respect to the unit mix data, please note that a lack of data for a given city does not necessarily mean that no projects or units were built in that city, but rather that no relevant data was available for that city.

Land prices range substantially across the surveyed transactions. To convey the range of land costs reviewed, Century | Urban provided the averages of the bottom third of the land sales, the middle third, and the highest third. Further detail on the land sales that were available is reflected in Exhibits 3 and 4.



Research and Data Sources

The estimates shown below are based on data and sources including but not limited to: similar projects Century | Urban has underwritten and/or priced; specific project economics Century | Urban has reviewed; direct conversations with developers and cost estimators; database research including CoStar, MLS, Redfin, and title databases; online research sources including City and project websites; market reports compiled by real estate sales and research organizations; and, Century | Urban's general experience assessing residential project feasibility in the San Francisco Bay Area.

Single Family Home Land Price Data

To generate the single-family land values utilized in the development cost estimates, Century | Urban collected sales data for land lots totaling one acre or less which transacted over the past three years across the surveyed jurisdictions in San Mateo and Santa Clara counties. Over 250 data points were collected. The data does not include properties with existing homes or infrastructure that were redeveloped as new single-family homes, and the data for some cities is limited.

As the data collected is not comprehensive, summaries and averages may be valuable for reaching overall conclusions about the range of land prices in the counties, but they may or may not be representative of a given city's average or median land price or the land price for a given parcel. The table in Exhibit 3 should therefore be reviewed noting the limited number of data points for certain cities. Land prices vary substantially by location, topography, site conditions, shape of the parcel, neighboring uses, access, noise, and many other factors. In addition, completed sales are necessarily past transactions and may not represent the current state of the market and expected future land sale prices.

Multi Family Home Land Price Data

Century | Urban collected available multi family land sales data from 2013 to the present in San Mateo and Santa Clara counties. Over 65 data points were collected. In certain cases, the multi family projects designated for the sites have not been completed. In those cases, Century | Urban based unit counts based on approved or the reported number of units planned. The data includes both sites with for-rent and for-sale projects.

Similar to the single family data points, the available information is not comprehensive and is more informative at a county level. Summaries and averages by city may not be valuable for reaching definitive conclusions about a given city's average or median land price or the land price for a given parcel. Particularly in cities with a less than five data points, any given sale or set of sales could represent an outlier or outliers which may affect median and average calculations. As noted above, land prices vary substantially by location, topography, site conditions, shape of the parcel, neighboring uses, access, noise, and many other factors. In addition, completed sales are necessarily past transactions and may not represent the current state of the market and expected future land sale prices.

**Exhibit 1: Total Development Cost: Single-family****Baird and Driskell****Total Development Costs - San Mateo and Santa Clara Counties**

Large numbers rounded to nearest \$'000 or nearest \$'0,000

	Single Family Small		Single Family Large	
	Total	\$ / SF	Total	\$ / SF
Prototype Elements				
1) Gross Residential Square Feet	2,600		5,000	
Hard Costs				
1) Residential Hard Costs	\$1,040,000	\$400	\$2,500,000	\$500
2) Site improvements and utilities				
3) Grading and erosion control				
4) Parking Hard Costs				
5) Contingency 5%	\$52,000	\$20	\$125,000	\$25
Total Hard Costs	\$1,092,000	\$420	\$2,625,000	\$525
Soft Costs				
1) Soft Costs 25.0%	\$270,000	\$104	\$660,000	\$132
2) City Fees	\$75,000	\$29	\$75,000	\$15
3) Soft Cost Contingency 5%	\$20,000	\$8	\$40,000	\$8
Total Soft Costs	\$365,000	\$133	\$775,000	\$147
% of hard costs	33%		30%	
Land Costs	Total	Per SF Bldg	Total	Per SF Bldg
1) Land Costs - San Mateo	\$1,030,000	\$396	\$1,030,000	\$206
2) Land Costs - Santa Clara	\$1,320,000	\$508	\$1,320,000	\$264
Single Family Land Cost Range				
SFH Land - Lower Price Tier	\$210,000	\$81	\$210,000	\$42
SFH Land - Middle Price Tier	\$730,000	\$281	\$730,000	\$146
SFH Land - Higher Price Tier	\$2,510,000	\$965	\$2,510,000	\$502
Total Development Cost - San Mateo	\$2,487,000	\$949	\$4,430,000	\$878
Total Development Cost - Santa Clara	\$2,777,000	\$1,060	\$4,720,000	\$936

Total Development Cost by Range of Land Cost

Single Family - Lower Land Price Tier	\$1,667,000	\$633	\$3,610,000	\$714
Single Family - Middle Land Price Tier	\$2,187,000	\$833	\$4,130,000	\$818
Single Family - Higher Land Price Tier	\$3,967,000	\$1,518	\$5,910,000	\$1,174

**Exhibit 1: Total Development Cost: Multi-family****Baird and Driskell****Total Development Costs - San Mateo and Santa Clara Counties**

Large numbers rounded to nearest \$'000 or nearest \$'0,000

		Multi-Family Small			Multi-Family Large		
		Total	\$ / SF	\$ / Unit	Total	\$ / SF	\$ / Unit
Prototype Elements							
1)	Gross Residential Square Feet	10,000			93,750		
2)	Parking Square Footage	3,750			40,000		
3)	Parking Type	Surface Lot			Standalone above grade		
4)	Units	10			100		
5)	Avg Net SF / Unit	850			750		
6)	Efficiency	85%			80%		
Hard Costs							
1)	Residential Hard Costs	\$4,150,000	\$415	\$420,000	\$39,840,000	\$425	\$400,000
2)	Site improvements and utilities	\$605,000			\$1,165,000		
3)	Grading and erosion control	\$110,000			\$335,000		
4)	Parking Hard Costs	\$100,000	\$28		\$4,800,000	\$120	
5)	Contingency 5%	\$250,000	\$21	\$21,000	\$2,310,000	\$21	\$20,000
Total Hard Costs		\$5,215,000	\$522	\$521,500	\$48,450,000	\$517	\$484,500
Soft Costs							
1)	Soft Costs 25.0%	\$1,303,750	\$130	\$130,000	\$12,110,000	\$129	\$120,000
2)	City Fees	\$350,000	\$35	\$35,000	\$2,800,000	\$30	\$28,000
3)	Soft Cost Contingency 5%	\$80,000	\$8	\$8,000	\$750,000	\$8	\$7,500
Total Soft Costs		\$1,733,750	\$165	\$165,000	\$15,660,000	\$159	\$148,000
% of hard costs		33%			32%		
Land Costs		Total		Per Unit			Per Unit
1)	Land Costs - San Mateo	\$1,000,000		\$100,000	\$10,000,000		\$100,000
2)	Land Costs - Santa Clara	\$600,000		\$60,000	\$6,000,000		\$60,000
Range of Land Costs							
Apts/Condo- Lower Price Tier		\$400,000		\$40,000	\$4,000,000		\$40,000
Apts/Condo- Middle Price Tier		\$800,000		\$80,000	\$8,000,000		\$80,000
Apts/Condo- Higher Cost Tier		\$1,600,000		\$160,000	\$16,000,000		\$160,000
Total Development Cost - San Mateo		\$7,948,750	\$795	\$786,500	\$74,110,000	\$791	\$732,500
Total Development Cost - Santa Clara		\$7,548,750	\$755	\$746,500	\$70,110,000	\$748	\$692,500
Total Development Cost by Range of Land Cost							
Apts/Condo- Lower Land Price Tier		\$7,348,750		\$726,500	\$68,110,000		\$672,500
Apts/Condo- Middle Land Price Tier		\$7,748,750		\$766,500	\$72,110,000		\$712,500
Apts/Condo- Higher Land Price Tier		\$8,548,750		\$846,500	\$80,110,000		\$792,500

**Exhibit 2: Unit Mixes – Number of Units by Unit Type and Unit Mix Percentages****San Mateo County Apartments**

Number of Units	Unit Numbers							Unit Mix				
	Projects	Studios	One	Two	Three	Four	Total	Studios	One	Two	Three	Four
Proposed	25	936	1,639	888	124	56	3,643	26%	45%	24%	3%	2%
Existing	63	905	4,223	2,626	523	1	8,279	11%	51%	32%	6%	0%
Final Planning	3	328	19	75	33	7	462	71%	4%	16%	7%	2%
Under Construction	16	268	619	523	79	0	1,489	18%	42%	35%	5%	0%
Totals	107	2,437	6,500	4,112	759	64	13,872	18%	47%	30%	5%	0%

	Projects	Studios	One	Two	Three	Four	Total	Studios	One	Two	Three	Four
South San Francisco	8	90	853	604	55	0	1,602	6%	53%	38%	3%	0%
San Mateo	19	228	734	715	154	1	1,832	12%	40%	39%	8%	0%
Redwood City	28	1,019	2,262	1,125	163	0	4,569	22%	50%	25%	4%	0%
Menlo Park	12	600	995	411	80	47	2,133	28%	47%	19%	4%	2%
Millbrae	3	147	151	133	23	0	454	32%	33%	29%	5%	0%
Foster City	5	12	367	302	83	0	764	2%	48%	40%	11%	0%
Burlingame	11	105	606	474	28	0	1,213	9%	50%	39%	2%	0%
Daly City	3	206	79	72	23	0	380	54%	21%	19%	6%	0%
San Carlos	7	0	101	84	88	9	282	0%	36%	30%	31%	3%
Half Moon Bay	2	0	149	21	2	0	172	0%	87%	12%	1%	0%
East Palo Alto	2	8	55	80	27	7	177	5%	31%	45%	15%	4%
San Bruno	4	4	119	62	14	0	199	2%	60%	31%	7%	0%
Belmont	1	18	25	21	17	0	81	22%	31%	26%	21%	0%
El Granada	1	0	3	6	0	0	9	0%	33%	67%	0%	0%
Pacifica	1	0	1	2	2	0	5	0%	20%	40%	40%	0%
Total	107	2,437	6,500	4,112	759	64	13,872	18%	47%	30%	5%	0%

San Mateo County Condominiums

Number of Units	Unit Numbers							Unit Mix				
	Projects	Studios	One	Two	Three	Four	Total	Studios	One	Two	Three	Four
Proposed	2	72	0	8	1	1	82	88%	0%	10%	1%	1%
Existing	12	0	46	293	194	0	533	0%	9%	55%	36%	0%
Final Planning	0	0	0	0	0	0	0					
Under Construction	1	0	0	10	0	0	10	0%	0%	100%	0%	0%
Total with Unit Mix Data	15	72	46	311	195	1	625	12%	7%	50%	31%	0%

	Projects	Studios	One	Two	Three	Four	Total	Studios	One	Two	Three	Four
South San Francisco	1	0	40	57	0	0	97	0%	41%	59%	0%	0%
San Mateo	5	72	0	201	97	1	371	19%	0%	54%	26%	0%
Daly City	2	0	0	2	84	0	86	0%	0%	2%	98%	0%
San Carlos	1	0	3	8	9	0	20	0%	15%	40%	45%	0%
Menlo Park	1	0	0	15	0	0	15	0%	0%	100%	0%	0%
Burlingame	3	0	3	18	1	0	22	0%	14%	82%	5%	0%
Redwood City	1	0	0	10	0	0	10	0%	0%	100%	0%	0%
Half Moon Bay	1	0	0	0	4	0	4	0%	0%	0%	100%	0%
Brisbane	No data available											
Belmont	No data available											
Foster City	No data available											
Pacifica	No data available											
Total	15	72	46	311	195	1	625	12%	7%	50%	31%	0%

**Exhibit 2: Unit Mixes – Unit Sizes****San Mateo County Apartments****Average Unit Sizes**

	<u>Studios</u>	<u>One</u>	<u>Two</u>	<u>Three</u>	<u>Four</u>
Proposed	506	688	1,115	1,565	2,208
Existing	535	745	1,108	1,411	1,939
Final Planning					
Under Construction	508	708	1,081	1,413	
Total Data Available	524	733	1,105	1,422	2,186

	<u>Studios</u>	<u>One</u>	<u>Two</u>	<u>Three</u>	<u>Four</u>
South San Francisco	511	705	1,116	1,321	
San Mateo	590	769	1,109	1,436	1,939
Redwood City	546	756	1,125	1,421	
Menlo Park	538	692	1,062	1,434	1,782
Millbrae	475	656	1,147	1,369	
Foster City	579	716	1,088	1,402	
Burlingame	518	785	1,128	1,368	
Daly City	422	649	932	1,187	
San Carlos		774	1,206	1,520	2,303
Half Moon Bay		659	957	1,330	
East Palo Alto		530	795		
San Bruno	476	716	1,006	1,386	
Belmont					
El Granada		616	1,047		
Pacifica		1,750	900	1,100	

San Mateo County Condominiums**Average Unit Sizes**

Insufficient data

**Exhibit 3: Single Family Land Sale Data Summary****Single Family Home Land Sites up to 1 acre, last 3 years**

County	City	Available Data Points	Per Square Foot				Per Single Family Home			
			Min	Max	Median	Average	Min	Max	Median	Average
San Mateo County	Moss Beach	19	\$14	\$117	\$64	\$64	\$125,000	\$582,500	\$375,000	\$335,053
San Mateo County	Woodside	4	\$10	\$88	\$24	\$36	\$150,000	\$2,000,000	\$377,250	\$726,125
San Mateo County	South San Francisco	4	\$33	\$89	\$59	\$60	\$165,000	\$3,800,000	\$431,000	\$1,206,750
San Mateo County	Montara	12	\$23	\$269	\$65	\$79	\$275,000	\$1,750,000	\$439,000	\$533,917
San Mateo County	Half Moon Bay	33	\$1	\$324	\$75	\$91	\$5,000	\$2,300,000	\$447,000	\$514,455
San Mateo County	Pacifica	6	\$14	\$105	\$70	\$63	\$300,000	\$925,000	\$447,500	\$500,000
San Mateo County	Belmont	12	\$2	\$721	\$56	\$118	\$55,000	\$4,470,000	\$495,000	\$960,583
San Mateo County	East Palo Alto	5	\$72	\$135	\$92	\$100	\$235,000	\$3,550,000	\$675,000	\$1,379,600
San Mateo County	Redwood City	18	\$6	\$345	\$129	\$145	\$50,000	\$5,350,000	\$825,000	\$1,170,250
San Mateo County	Emerald Hills	2	\$125	\$132	\$129	\$129	\$975,000	\$980,000	\$977,500	\$977,500
San Mateo County	San Bruno	2	\$179	\$207	\$193	\$193	\$560,000	\$1,500,250	\$1,030,125	\$1,030,125
San Mateo County	San Carlos	11	\$2	\$405	\$94	\$126	\$29,000	\$2,980,000	\$1,100,000	\$1,214,455
San Mateo County	San Mateo	1	\$500	\$500	\$500	\$500	\$1,500,000	\$1,500,000	\$1,500,000	\$1,500,000
San Mateo County	Portola Valley	4	\$47	\$129	\$58	\$73	\$1,325,000	\$3,000,000	\$1,578,000	\$1,870,250
San Mateo County	Burlingame	1	\$125	\$125	\$125	\$125	\$1,600,000	\$1,600,000	\$1,600,000	\$1,600,000
San Mateo County	Menlo Park	3	\$165	\$591	\$459	\$405	\$2,580,000	\$6,500,000	\$2,780,000	\$3,953,333
San Mateo County	Millbrae	1	\$239	\$239	\$239	\$239	\$3,080,500	\$3,080,500	\$3,080,500	\$3,080,500
San Mateo County	Hillsborough	3	\$85	\$306	\$116	\$169	\$3,050,000	\$8,000,000	\$4,000,000	\$5,016,667
San Mateo County	Atherton	2	\$147	\$208	\$178	\$178	\$2,500,000	\$6,400,000	\$4,450,000	\$4,450,000
San Mateo County	Total	143	\$1	\$721	\$84	\$110	\$5,000	\$8,000,000	\$510,000	\$1,026,691
Santa Clara County	Los Gatos	15	\$1	\$251	\$6	\$50	\$9,500	\$3,250,000	\$250,000	\$716,237
Santa Clara County	Morgan Hill	11	\$1	\$495	\$15	\$79	\$29,000	\$1,365,000	\$475,000	\$490,533
Santa Clara County	San Jose	54	\$12	\$677	\$75	\$150	\$32,000	\$5,300,000	\$925,000	\$949,380
Santa Clara County	Campbell	8	\$13	\$897	\$120	\$194	\$10,000	\$1,500,000	\$1,038,000	\$975,000
Santa Clara County	Mountain View	3	\$76	\$271	\$141	\$163	\$1,050,000	\$2,300,000	\$1,150,000	\$1,500,000
Santa Clara County	Santa Clara	1	\$169	\$169	\$169	\$169	\$1,275,000	\$1,275,000	\$1,275,000	\$1,275,000
Santa Clara County	Sunnyvale	3	\$167	\$602	\$214	\$328	\$1,080,000	\$5,750,000	\$1,345,000	\$2,725,000
Santa Clara County	Cupertino	4	\$47	\$297	\$197	\$185	\$872,000	\$2,900,000	\$2,175,000	\$2,030,500
Santa Clara County	Monte Sereno	2	\$61	\$1,006	\$534	\$534	\$2,142,714	\$2,427,500	\$2,285,107	\$2,285,107
Santa Clara County	Saratoga	5	\$61	\$171	\$74	\$93	\$1,380,000	\$2,900,000	\$2,640,000	\$2,386,000
Santa Clara County	Palo Alto	7	\$79	\$584	\$333	\$323	\$2,050,000	\$4,000,000	\$3,100,000	\$2,965,000
Santa Clara County	Los Altos	5	\$121	\$352	\$257	\$235	\$1,600,000	\$7,250,000	\$3,470,000	\$3,723,600
Santa Clara County	Los Altos Hills	1	\$99	\$99	\$99	\$99	\$3,995,000	\$3,995,000	\$3,995,000	\$3,995,000
Santa Clara County	Total	119	\$1	\$1,006	\$84	\$157	\$9,500	\$7,250,000	\$1,065,000	\$1,320,556

The data in the table above represents the available single family home lot sales data points collected for this high-level survey. As the data is limited for certain cities, the specific, median, and average amounts per city may not be representative of a city's current median or average land costs or the city's land costs relative to other cities listed.

**Exhibit 4: Multi Family Land Sale Data Summary****Multi Family Land Sites - Available Data**

<u>County</u>	<u>City</u>	<u>Available</u>		<u>Per Multi Family Unit</u>			
		<u>Data Points</u>	<u>Min</u>	<u>Max</u>	<u>Median</u>	<u>Average</u>	
San Mateo	San Mateo	3	\$135,000	\$180,000	\$151,000	\$155,000	
San Mateo	San Carlos	4	\$33,000	\$333,000	\$262,000	\$222,000	
San Mateo	Millbrae	2	\$64,000	\$92,000	\$78,000	\$78,000	
San Mateo	Redwood City	6	\$78,000	\$400,000	\$95,000	\$157,000	
San Mateo	South San Francisco	2	\$44,000	\$77,000	\$61,000	\$61,000	
San Mateo	Burlingame	3	\$59,000	\$117,000	\$73,000	\$83,000	
San Mateo	Menlo Park	3	\$37,000	\$98,000	\$50,000	\$62,000	
San Mateo	Daly City	2	\$29,000	\$60,000	\$45,000	\$45,000	
San Mateo	Pacifica	2	\$117,000	\$118,000	\$117,000	\$117,000	
San Mateo	Belmont	1	\$105,000	\$105,000	\$105,000	\$105,000	
San Mateo	Total	28	\$29,000	\$400,000	\$95,000	\$123,000	
			<i>County Weighted</i>				
			<i>Average</i>				\$96,000
			<i>Per Unit Land Amount Applied</i>				\$100,000

<u>County</u>	<u>City</u>	<u>Available</u>		<u>Per Multi Family Unit</u>			
		<u>Data Points</u>	<u>Min</u>	<u>Max</u>	<u>Median</u>	<u>Average</u>	
Santa Clara	San Jose	17	\$16,000	\$125,000	\$50,000	\$52,000	
Santa Clara	Gilroy	1	\$44,000	\$44,000	\$44,000	\$44,000	
Santa Clara	Morgan Hill	1	\$86,000	\$86,000	\$86,000	\$86,000	
Santa Clara	Campbell	3	\$42,000	\$184,000	\$59,000	\$95,000	
Santa Clara	Santa Clara	6	\$18,000	\$146,000	\$92,000	\$83,000	
Santa Clara	Sunnyvale	6	\$55,000	\$306,000	\$238,000	\$215,000	
Santa Clara	Palo Alto	1	\$73,000	\$73,000	\$73,000	\$73,000	
Santa Clara	Mountain View	4	\$45,000	\$736,000	\$120,000	\$256,000	
Santa Clara	Los Altos	1	\$513,000	\$513,000	\$513,000	\$513,000	
Santa Clara	Total	40	\$16,000	\$736,000	\$60,000	\$117,000	
			<i>County Weighted</i>				
			<i>Average</i>				\$63,000
			<i>Per Unit Land Amount Applied</i>				\$60,000

The data in the table above represents the available multi family home lot sales data points collected for this high-level survey. As the data is limited for certain cities, the specific, median, and average amounts per city may not be representative of a city's current median or average land costs or the city's land costs relative to other cities listed.

Appendix C

San Bruno Fair Housing Assessment



21 Elements

City of San Bruno Fair Housing Assessment

What is AFFH?

The State of California's 2018 Assembly Bill (AB 686) requires that all public agencies in the state affirmatively further fair housing (AFFH) beginning January 1, 2019. Public agencies receiving funding from the U.S. Department of Housing and Urban Development (HUD) are also required to demonstrate their commitment to AFFH. The federal obligation stems from the fair housing component of the federal Civil Rights Act mandating federal fund recipients to take "meaningful actions" to address segregation and related barriers to fair housing choice.

AB 686 requires all public agencies to "administer programs and activities relating to housing and community development in a manner that affirmatively furthers fair housing, and take no action inconsistent with this obligation"¹

AB 686 also makes changes to Housing Element Law to incorporate requirements to AFFH as part of the housing element and general plan to include an analysis of fair housing outreach and capacity, integration and segregation, access to opportunity, disparate housing needs, and current fair housing practices.

Affirmatively Furthering Fair Housing

"Affirmatively furthering fair housing" 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

¹ California Department of Housing and Community Development Guidance, 2021, page 9.

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).)"

Source: California Department of Housing and Community Development Guidance, 2021, page 14.

History of segregation in the region. The

United States' oldest cities have a history of mandating segregated living patterns—and Northern California cities are no exception. ABAG, in its recent Fair Housing Equity Assessment, attributes segregation in the Bay Area to historically discriminatory practices—highlighting redlining and discriminatory mortgage approvals—as well as “structural inequities” in society, and “self segregation” (i.e., preferences to live near similar people).

Researcher Richard Rothstein's 2017 book *The Color of Law: A Forgotten History of How Our Government Segregated America* chronicles how the public sector contributed to the segregation that exists today. Rothstein highlights several significant developments in the Bay Area region that played a large role in where the region's non-White residents settled.

This history of segregation in the region is important not only to understand how residential settlement patterns came about—but, more importantly, to explain differences in housing opportunity among residents today. In sum, not all residents had the ability to build housing wealth or achieve economic opportunity. This historically unequal playing field in part determines why residents have different housing needs today.

Pre-civil rights San Mateo County faced resistance to racial integration, yet it was reportedly less direct than in some Northern California communities, taking the form of “blockbusting” and “steering” or intervention by public officials. These local discriminatory practices were exacerbated by actions of the Federal Housing Administration which excluded low income neighborhoods, where the majority of people of color lived, from its mortgage loan program.

According to the San Mateo County Historical Association. San Mateo County's early African Americans worked in a variety of industries, from logging, to agriculture, to restaurants and entertainment. Expansion of jobs, particularly related to shipbuilding during and after World War II attracted many new residents into the Peninsula, including the first sizable migration of African Americans. Enforcement of racial covenants after the war forced the migration of the county's African Americans into neighborhoods where they were allowed

to occupy housing—housing segregated into less desirable areas, next to highways, and concentrated in public housing and urban renewal developments.

The private sector contributed to segregation through activities that discouraged (blockbusting) or prohibited (restrictive covenants) integrated neighborhoods. In the City of San Mateo, builders of the Hillsdale neighborhood in the mid-1900s recorded deeds that specified that only “members of the Caucasian or White race shall be permitted” to occupy sold homes—the exception being “domestics in the employ[ment] on the premises.”² This developer went on to develop many race-restricted neighborhoods in the Bay Area, became president of the National Association of Home Builders (NAHB), became national president of the Urban Land Institute (ULI), and was inducted into California’s Homebuilding Foundation Hall of Fame.

The segregatory effect of blockbusting activities is well-documented in East Palo Alto. In 1954, after a White family in East Palo Alto sold their home to an African American family, the then-president of the California Real Estate Association set up an office in East Palo Alto to scare White families into selling their homes (“for fear of declining property values”) to agents and speculators. These agents then sold these homes at over-inflated prices to African American buyers, some of whom had trouble making their payments. Within six years, East Palo Alto—initially established with “whites only” neighborhoods—became 82% African American. The FHA prevented re-integration by refusing to insure mortgages held by White buyers residing in East Palo Alto.

Throughout the county, neighborhood associations and city leaders attempted to thwart integration of communities. Although some neighborhood residents supported integration, most did not, and it was not unusual for neighborhood associations to require acceptance of all new buyers. Builders with intentions to develop for all types of buyers (regardless of race) found that their development sites were rezoned by planning councils, required very large minimum lot sizes, and/or were denied public infrastructure to support their developments or charged prohibitively high amounts for infrastructure.

In addition to historical discriminatory practices that embedded segregation into living patterns throughout the Bay Area, it’s also necessary to recognize the historical impacts of colonization and genocide on Indigenous populations and how the effects of those atrocities are still being felt today. The original inhabitants of present-day San Mateo County are the Ramaytush Ohlone, who have “...lived on the San Francisco Peninsula for thousands of years and continue to live here as respectful stewards of the land.”³ However, “[d]ue to the devastating policies and practices of a succession of explorers, missionaries, settlers, and various levels of government over the centuries since European expansion,

² <https://www.nytimes.com/2020/08/14/opinion/sunday/blm-residential-segregation.html>

³ <https://www.smcoe.org/for-communities/indigenous-people-of-san-mateo-county.html>

the Ramaytush Ohlone lost the vast majority of their population as well as their land.”⁴ The lasting influence of these policies and practices have contributed directly to the disparate housing and economic outcomes collectively experienced by Native populations today.⁵

The timeline of major federal Acts and court decisions related to fair housing choice and zoning and land use appears on the following page.

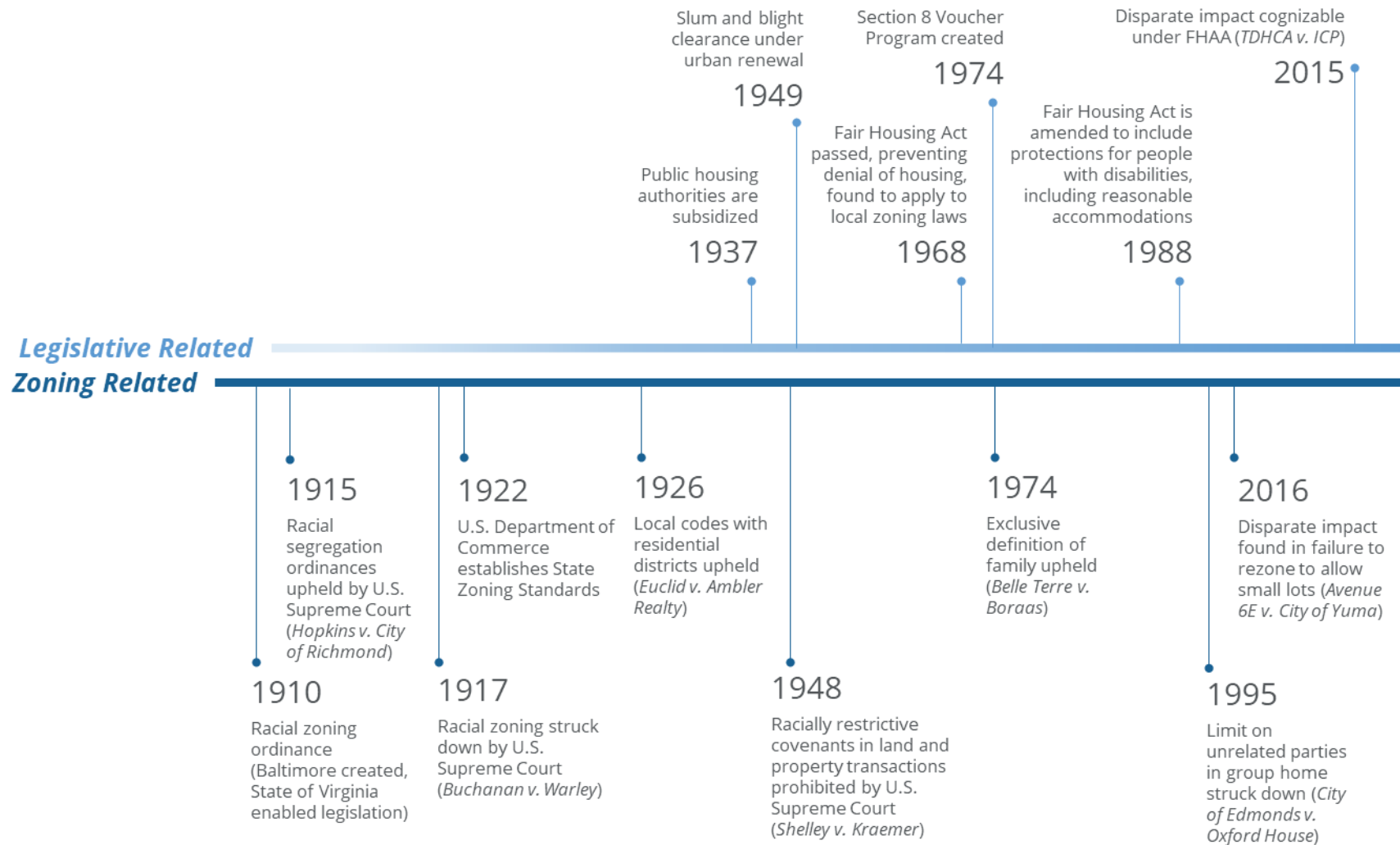
As shown in the timeline, exclusive zoning practices were common in the early 1900s. Courts struck down only the most discriminatory, and allowed those that would be considered today to have a “disparate impact” on classes protected by the Fair Housing Act. For example, the 1926 case *Village of Euclid v. Amber Realty Co.* (272 U.S. 365) supported the segregation of residential, business, and industrial uses, justifying separation by characterizing apartment buildings as “mere parasite(s)” with the potential to “utterly destroy” the character and desirability of neighborhoods. At that time, multifamily apartments were the only housing options for people of color, including immigrants.

The Federal Fair Housing Act was not enacted until nearly 60 years after the first racial zoning ordinances appeared in U.S. cities. This coincided with a shift away from federal control over low income housing toward locally-tailored approaches (block grants) and market-oriented choice (Section 8 subsidies)—the latter of which is only effective when adequate affordable rental units are available.

⁴ <https://www.smcoe.org/for-communities/indigenous-people-of-san-mateo-county.html>

⁵ <https://www.americanprogress.org/article/systemic-inequality-displacement-exclusion-segregation/>

Major Public and Legal Actions that Influence Fair Access to Housing



Maps and data referenced in this section. Throughout this section, there are references to maps created by HCD to support the AFFH and data tables created by HCD, the Association of Bay Area Governments (ABAG), and the consultant team. Those maps and tables appear in an Appendix and follow the organization of this section and the state guidance. The maps, in particular, are useful in demonstrating how the City of San Bruno compares with surrounding jurisdictions and the county overall in offering housing choices and access to opportunity.

Report content and organization. This Fair Housing Assessment follows the April 2021 State of California State Guidance for AFFH. The study was conducted as part of the 21 Elements process, which facilitates the completion of Housing Elements for all San Mateo County jurisdictions.

Primary Findings, Contributing Factors, and Fair Housing Action Plan identifies the primary factors contributing to fair housing challenges and the plan for taking meaningful actions to improve access to housing and economic opportunity.

Section I. Fair Housing Enforcement and Outreach Capacity reviews lawsuits/enforcement actions/complaints against the jurisdiction; 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.

Appendices.

- Map and Data packet—includes data tables and maps that support this section
 - [Available March or April 2022] Resident survey results—findings from a survey of San Mateo County residents on their experience finding and remaining in housing
 - Disparate Access to Educational Opportunities—findings from a countywide analysis of access to education and educational outcomes by protected class.
 - State Fair Housing Laws and Regulations—summary of key state laws and regulations related to mitigating housing discrimination and expanding housing choice
-

Primary Findings

This section summarizes the primary findings from the Fair Housing Assessment for the City of San Bruno including the following sections: fair housing enforcement and outreach capacity, integration and segregation, access to opportunity, disparate housing needs, and contributing factors and the city's fair housing action plan.

- **Seven percent of fair housing complaints filed in San Mateo County from 2017 to 2021 (57 total) were in the City of San Bruno (4 total), higher than the city's share of the county's population (6%).** Issues cited in the city were refusal to rent, refusal to rent and negotiate for a rental, discrimination in terms, conditions, privileges relating to a rental, and failure to make a reasonable accommodation. **All fair housing complaints in the city were on the basis of disability status** (4 complaints).
- San Bruno's residents are more racially and ethnically diverse than residents in the county overall: San Bruno has a higher share of residents who are Asian, Hispanic, and report "Other" and Multiple races.
- The city's non-White and Hispanic residents are **disproportionately impacted by poverty, low household incomes, overcrowding, mortgage loan denials, and homelessness** compared to the non-Hispanic White population in the City of San Bruno. Specifically,
 - Residents reporting Other/Multiple races have very high rates of poverty (Figure II-5) and American Indian/Alaska Native and Hispanic households have lower household incomes (Figure II-4) compared to the non-Hispanic White population in the City of San Bruno. On the positive side, African American households have a comparable income distribution to non-Hispanic, White households, and Asian households have higher income distributions.
 - Hispanic households are more likely than non-Hispanic White households to experience overcrowding (Figure IV-17), as are Asian households, which is unusual given their higher income distributions. Low and moderate income households are also more likely to be overcrowded (Figure IV-18).
 - Hispanic and Other/Multiple race residents are more likely to live in low resource areas compared to high resource areas. Conversely, Non-Hispanic White residents are more likely to live in moderate and high resource areas (Figure III-12).
 - People who identify as American Indian or Alaskan Native, Black, White, and Hispanic are overrepresented in the homeless population compared to their share of the general population (Figure IV-22).

- American Indian or Alaska Native, Black or African American, and Hispanic households have the highest denial rates for mortgage loan applications in 2018 and 2019 (Figure IV-33).
- **Forty six percent of all renter households in the City of San Bruno are cost burdened**—spending more than 30% of their gross income on housing costs—and one in four are extremely cost burdened—spending more than 50% of their gross income on housing costs (Figure IV-9). This is nearly identical to the rates of cost burden in the county and Bay area overall, suggesting that San Bruno is providing the affordable housing at the same level as the county and region overall.
- There are **disparities in housing cost burden in the City of San Bruno by race and ethnicity and family size** (Figure IV-11 and Figure IV-12), with Other/Multiple race, American Indian or Alaskan Native, and Hispanic residents and large families facing the highest rates of cost burden.
- Geospatially, **the area of the city east of El Camino Real** is disproportionately impacted by low educational opportunity, low economic opportunity, low environmental scores, high social vulnerability scores, concentrations of cost burdened households, overcrowding, and low resource scores. This area is characterized by:
 - Education opportunity scores between 0.25 and 0.5—lower education scores compared to the rest of the city (Figure III-1).
 - Low economic opportunity scores between 0.25 and 0.5 (Figure III-7).
 - Low environmental scores (less than 0.25)—which account for PM2.5, diesel PM, pesticides, toxic release, traffic, cleanup sites, groundwater threats, hazardous waste, impaired water bodies, and solid waste sites (Figure III-9). The area east of El Camino Real in the City of San Bruno has particularly poor environmental outcomes for traffic, groundwater threats, and diesel particulate matter.
 - The composite opportunity score for the City of San Bruno shows census tracts east of El Camino Real fall within low resource areas. Census tracts east of Interstate 280 fall within moderate resource areas while census tracts west of Interstate 280 fall within high resource areas (Figure III-14).
 - The Social Vulnerability Index (SVI) provided by the Centers for Disease Control and Prevention (CDC) ranks census tracts based on their ability to respond to a disaster and includes four themes of socioeconomic status, household composition, race or ethnicity, and housing and transportation. The area east of El Camino Real is most vulnerable according to the SVI (Figure III-15).

- A concentration (60% to 80% of households) of cost burdened households (Figure IV-13).
- Overcrowded households, concentrated in the same areas as cost burdened households (Figure IV-19).
- These areas are also partially within Special Flood Hazard Areas (Figure IV-31) and are vulnerable to displacement (Figure IV-28).
- The City of San Bruno has **the same proportion of residents with a disability (8%) as the county** (Figure III-17). Residents living with a disability in the city are more likely to be employed and are largely concentrated in the northwest area of the city. Finally, the aging population is putting a strain on paratransit access countywide.
- Racial and ethnic minority students in the City of San Bruno—served by the San Mateo Union High School District and the San Bruno Park Elementary School District—**experience lower educational outcomes compared to other students**. Many high schoolers in the county met admission standards for a University of California (UC) or California State University (CSU) school. However, **Pacific Islander, Hispanic, and Black students in the San Mateo Union district were less likely to meet the admission standards**. Although San Mateo Union High School has relatively low drop out rates—4% of students—compared to other districts in the county, **drop out rates among Hispanic (7%), Black (6%), and Pacific Islander students are higher** (Disparate Access to Educational Opportunities Appendix).

Contributing factors and Fair Housing Action Plan. The disparities in housing choice and access to opportunity discussed above stem from historical actions, socioeconomic factors that limit employment and income growth, the inability of the broader region to respond to housing demand, regional barriers to open housing choice, and, until recently, very limited resources to respond to needs. Specifically,

Fair housing issue: Hispanic, Other/Multiple Race, American Indian or Alaskan Native, Black households, and large families have disproportionate housing needs. These needs are evident in high levels of cost burden.

Contributing factors:

- Hispanic residents are primarily concentrated in areas east of El Camino Real. According to HCD, these areas have the highest concentration of low to moderate income populations and face poor opportunity outcomes according to TCAC's opportunity maps.
- There is a relative lack of affordable housing opportunities in higher resourced areas of the city.

Fair housing issue: Hispanic residents are concentrated in areas of the city with the lowest opportunity scores—except for employment access.

Contributing factors:

- The Census Tract directly east of El Camino Real is designated as a SB 535 Disadvantaged Community, which is defined under SB 535 as, “the top 25%

scoring areas from CalEnviroScreen along with other areas with high amounts of pollution and low populations.” Hispanic households are primarily concentrated in this portion of the city.

According to HCD and TCAC’s opportunity maps, this area has the highest concentration of low to moderate income populations who face poor opportunity outcomes. However, the area has the best access to employment opportunities.

- Although affordable housing (as captured in the HCD Location Affordability Index) are not as highly concentrated in the City of San Bruno compared to other cities throughout the county, the eastern area of the city offers the most affordable homes. As such, residents living in these areas have lower incomes and higher rates of poverty. Preference may be at play as well: A recent article in Cityscape found that Hispanic homebuyers —when controlled for demographics, loan characteristics, and finances—are more likely to purchase homes in neighborhoods with fewer non-Hispanic White homeowners and lower economic opportunity.⁶

Fair housing issue: Persons with disabilities are most likely to file complaints of housing discrimination due to refusal to rent or negotiate for a rental, discriminatory terms, conditions, or privileges and failure to make reasonable accommodations.

Contributing factors:

- There were four complaints filed with HUD in the City of San Bruno from 2017 to 2020 —all on the basis of disability— where the issues cited included a failure to make reasonable accommodations. Landlords and property owners are required to provide reasonable accommodations to residents living with a disability upon request.
- Lack of understanding of reasonable accommodation requirements by landlords and property owners
- Lack of knowledge about fair housing laws by landlords and property owners

Fair housing issues in education:

Students of color face disparities in subject proficiency compared to the overall student population at both San Bruno Park Elementary School District and San Mateo Union High School District.

- Overall, 50% of San Bruno Park Elementary District students meet or exceed English language arts and literacy standards and 41% exceed math standards. For Black or African American students, however, 39% are English language arts and literacy proficient and 23% are math proficient. For

⁶ Sanchez-Moyano, R. (2021). Achieving spatial equity through suburban homeownership? Neighborhood attributes of Hispanic homebuyers. *Cityscape: A Journal of Policy Development and Research*. Volume 23(3).

Hispanic students, 36% are English language arts and literacy proficient and 25% are math proficient.

- Overall, 70% of San Mateo Union High School District students meet or exceed English language arts and literacy standards and 50% exceed math standards. For Black or African American students, however, 55% are English language arts and literacy proficient.⁷ For Hispanic students, 50% are English language arts and literacy proficient and 22% are math proficient. For Pacific Islander students, 34% are English language arts and literacy proficient and 20% exceed mathematics testing standards.
- Hispanic and Pacific Islanders face higher rates of chronic absenteeism than the overall school population at both local school districts. Hispanic and Black or African American students have the highest dropout rates in San Mateo Union School District.

Hispanic students face high rates of suspension compared to their representation among student bodies.

Contributing factors:

- The reasons for these disparities are unclear and should be examined. The gaps suggest that Hispanic students need greater support to succeed, and that schools in the San Bruno area need to focus more closely on efforts to close proficiency gaps and ensure equity in education.

The Fair Housing Action Plan (FHAP) below details how the City of San Bruno proposes to respond to the factors contributing to the fair housing challenges identified in this analysis.

SECTION I. Fair Housing Enforcement and Outreach Capacity

This section discusses fair housing legal cases and inquiries, fair housing protections and enforcement, and outreach capacity.

Fair housing legal cases and inquiries. California fair housing law extends beyond the protections in the Federal Fair Housing Act (FHA). In addition to the FHA protected classes—race, color, ancestry/national origin, religion, disability, sex, and familial status—**California law offers protections for age, sexual orientation, gender identity or expression, genetic information, marital status, military or veteran status, and source of income** (including federal housing assistance vouchers).

⁷ No data for Black or African American students related to their proficiency of mathematics.

The California Department of Fair Employment in Housing (DFEH) was established in 1980 and is now the **largest civil rights agency in the United States**. According to their website, the DFEH's mission is, "to protect the people of California from unlawful discrimination in employment, housing and public accommodations (businesses) and from hate violence and human trafficking in accordance with the Fair Employment and Housing Act (FEHA), Unruh Civil Rights Act, Disabled Persons Act, and Ralph Civil Rights Act".⁸

DFEH receives, evaluates, and investigates fair housing complaints. DFEH plays a particularly significant role in investigating fair housing complaints against protected classes that are not included in federal legislation and therefore not investigated by HUD. DFEH's website provides detailed instructions for filing a complaint, the complaint process, appealing a decision, and other frequently asked questions.⁹ Fair housing complaints can also be submitted to HUD for investigation.

Additionally, San Mateo County has a number of **local enforcement organizations** including Project Sentinel, the Legal Aid Society of San Mateo County, and Community Legal Services of East Palo Alto. These organizations receive funding from the County and participating jurisdictions to support fair housing enforcement and outreach and education in the County (Figure I-1).

From 2017 to 2021, **57 fair housing complaints in San Mateo County were filed with the U.S. Department of Housing and Urban Development (HUD) (Figure I-2)—7% of complaints were in the City of San Bruno (4 complaints) (Figure I-3)**. Most complaints submitted to HUD cited disability status as the bias (56%) followed by race (19%), and familial status (14%). In the City of San Bruno, the most common issues cited were refusal to rent, refusal to rent and negotiate for a rental, discrimination in terms, conditions, privileges relating to rental, and failure to make a reasonable accommodation.

Countywide, no cause determination was found in 27 complaints followed by successful conciliation or settlement with 22 complaints. Fair housing inquiries in 2020 were primarily submitted from the City of San Mateo, Redwood City, Daly City, and Menlo Park (Figure I-3, Figure I-4, and Figure I-5).

Fair housing complaints filed with HUD by San Mateo County residents have been on a declining trend since 2018, when 18 complaints were filed. In 2019, complaints dropped to 5, increased to 11 in 2020, and had reached 6 by mid-2021.

Nationally, the National Fair Housing Alliance (NFHA) reported a "negligible" decrease in the number of complaints filed between 2019 and 2020. The primary bases for complaints nationally were nearly identical to San Mateo County's: disability (55%) and race (17%).

⁸ <https://www.dfeh.ca.gov/aboutdfeh/>

⁹ <https://www.dfeh.ca.gov/complaintprocess/>

Familial status represented 8% of complaints nationally, whereas this basis comprised 14% of cases in the county.

NFHA identifies three significant trends in 2020 that are relevant for San Mateo County:

- First, fair lending cases referred to the Department of Justice from federal banking regulators has been declining, indicating that state and local government entities may want to play a larger role in examining fair lending barriers to homeownership.
- Second, NFHA identified a significant increase in the number of complaints of harassment—1,071 complaints in 2020 compared to 761 in 2019.
- Finally, NFHA found that 73% of all fair housing complaints in 2020 were processed by private fair housing organizations, rather than state, local, and federal government agencies—reinforcing the need for local, active fair housing organizations and increased funding for such organizations.¹⁰

¹⁰ <https://nationalfairhousing.org/2021/07/29/annual-fair-housing-report-shows-increase-in-housing-harassment/>

Fair Housing Complaints and Inquiries

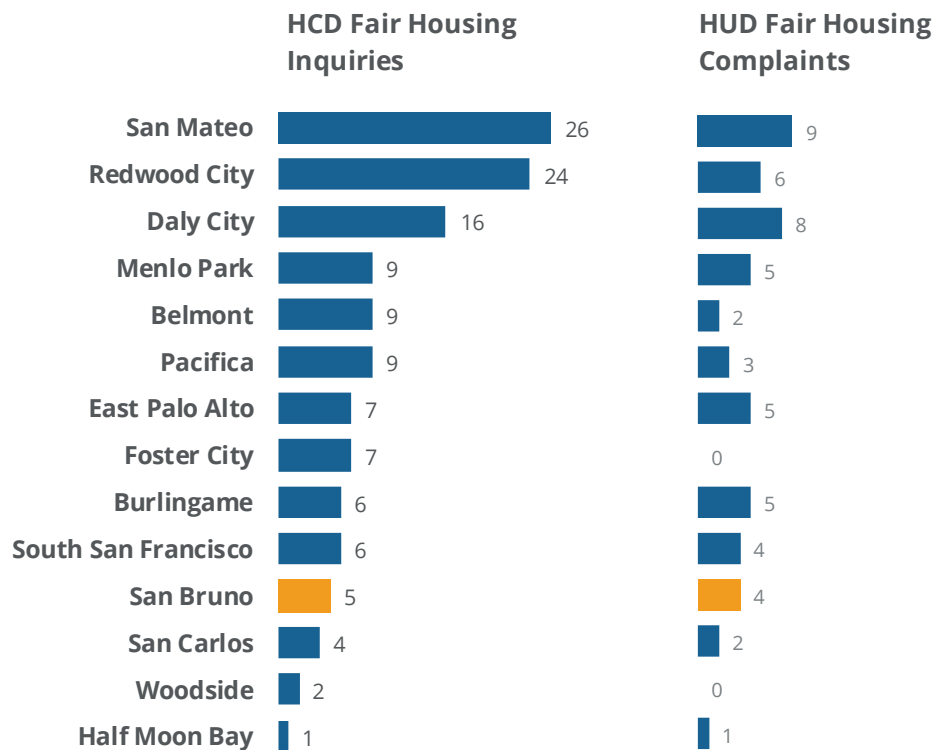
HUD Fair Housing Complaints, by Basis, San Mateo County, 2017-2021



	Number	Percent
Disability	32	56%
Race	11	19%
Familial Status	8	14%
National Origin	3	5%
Religion	2	4%
Sex	1	2%

Total cases 57 100%

HCD Fair Housing Inquiries (2013- 2021) and HUD Fair Housing Complaints (2017- 2021)



Outreach and capacity. The City of San Bruno could improve the accessibility of fair housing information on their website and resources for residents experiencing housing discrimination. The city's website does provide limited information on fair housing resources, but it is not located on the city's main housing webpage.¹¹ Overall, the

¹¹ https://www.sanbruno.ca.gov/gov/city_departments/commdev/housing/default.htm

accessibility of fair housing information could be improved by providing information on the Fair Housing Act, AFFH-related information for the state of California, and contact information for local fair housing organizations, legal assistance, and general information in one consolidated place. Additionally, a link to the Regional Assessment of Fair Housing—approved by HUD in November 2017—could be provided.

Compliance with state law. The City of San Bruno is compliant with the following state laws that promote fair and affordable housing. The city has not been alleged or found in violation of the following:

Housing specific policies enacted locally. The City of San Bruno identified the following local policies that contribute to the regulatory environment for affordable housing development in the city.

Local policies in place to encourage housing development.

- Mixed Use Zoning
- Condominium Conversion Ordinance
- Housing Development Impact Fee
- Commercial Development Impact Fee
- Second Unit Ordinance
- Density Bonus Ordinance

Local barriers to affordable housing development.

- Height limits on multifamily developments
- Voter initiatives that restrict multifamily developments, rezoning for higher density, height limits or similar measures
- Excessive parking requirements
- No policies to mitigate displacement of low income households

Local policies that are NOT in place but would provide the best outcomes in addressing housing shortages.

- Rental assistance or rent subsidies

Local policies that are NOT in place, but have potential Council interest for further exploration.

- Community land trusts
- Dedicating surplus land for affordable housing

Local policies in place to mitigate or prevent displacement of low income households.

- Affordable housing impact/linkage fee on new residential and commercial development
- Inclusionary zoning
- Promoting streamlined processing of ADUs

According to the California Department of Housing and Community Development AFFH Data Viewer (HCD data viewer), the City of San Bruno does not have any public housing buildings (Figure I-6). However, the city does one census tract with a sizable share of household units with housing vouchers (15% to 30%), three tracts with a moderate share (5% to 15%) and three other tracts with some (5% or less) housing voucher utilization (Figure I-7).

Compared to nearby Millbrae, Burlingame, and Hillsborough, the **City of San Bruno appears accommodating to renters with housing vouchers** because the city has a greater share of voucher holders compared to the surrounding communities (Figure I-7). The presence of housing voucher users indicates available rental supply to house these residents and a lack of exclusionary behavior from landlords in the city.

SECTION II. Integration and Segregation

This section discusses integration and segregation of the population by protected classes including race and ethnicity, disability status, familial status, and income status. The section concludes with an analysis of racially and ethnically concentrated areas of poverty and affluence.

Integration and Segregation

“Integration generally means a condition in which there is not a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability when compared to a broader geographic area.

Segregation generally means a condition in which there is a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a type of disability in a particular geographic area when compared to a broader geographic area.”

Source: California Department of Housing and Community Development Guidance, 2021, page 31.

Race and ethnicity. Generally, the demographic characteristics of the City of San Bruno are consistent with the overall characteristics of San Mateo County. The population **distribution by race and ethnicity is slightly different than the county** with the largest proportion of the population being Asian (34%) followed by non-Hispanic White (33%), Hispanic (27%), other or multiple races (6%), and Black (1%) (Figure II-1).¹² **Older residents are less diverse** with 62% of the population older than 65 years identifying as White compared to only 40% of the population for children less than 18 years old (Figure II-3).

Racial and ethnic minority populations generally have higher rates of poverty compared to the non-Hispanic White population in the City of San Bruno (Figure II-4 and Figure II-5). Additionally, Other/Multiple race, American Indian or Alaska Native and Hispanic households have lower household incomes compared to non-Hispanic White households in San Bruno.

Geospatially, the City of San Bruno has three census tracts with sizable White majorities and one census tract with a slim White majority (Figures II-6, II-7, II-8, II-9, and II-10).¹³ Additionally, two other census tracts have sizable Hispanic majorities and three other have

¹² The share of the population that identifies as American Indian or Alaska Native is less than 1%.

¹³ Majority census tracts show the predominant racial or ethnic group by tract compared to the next most populous.

Asian majorities—two sizable and one slim. It's worth noting that these census tracts of majority populations by race and ethnicity are relatively segregated— White majorities are located in the southern portion of the city, Asian majorities are located in the north and northwestern portions, and Hispanic majorities are in the eastern portion of the city.¹⁴

[PLACEHOLDER] Dissimilarity and isolation indices. [ABAG DI and isolation indices were not available at the time this report was prepared].

The Dissimilarity Index, or DI, is a common tool that measures segregation in a community. The DI is an index that measures the degree to which two distinct groups are evenly distributed across a geographic area. The DI represents the percentage of a group's population that would have to move for each area in the county to have the same percentage of that group as the county overall.

DI values range from 0 to 100—where 0 is perfect integration and 100 is complete segregation. Dissimilarity index values between 0 and 39 generally indicate low segregation, values between 40 and 54 generally indicate moderate segregation, and values between 55 and 100 generally indicate a high level of segregation.

The isolation index is interpreted as the probability that a randomly drawn minority resident shares an area with a member of the same minority, it ranges from 0 to 100 and higher values of isolation tend to indicate higher levels of segregation.

Disability status. The **share of the population living with at least one disability is 8% in the City of San Bruno**, same as San Mateo County (Figure II-13). There is one census tract in the city that has a 10% to 20% share of the population living with a disability, which is located east of Skyline Boulevard and north of Sneath Lane (Figure II-14). Geographic concentrations of people living with a disability may indicate the area has ample **access to services, amenities, and transportation that support this population**.

Familial Status. The City of San Bruno is home to **more single-person households** than the county, with 25% of households compared to only 22% in the County (Figure II-16). Collectively, there are **slightly fewer married-couple families and families with children in the city** (Figure II-17 and Figure II-18).

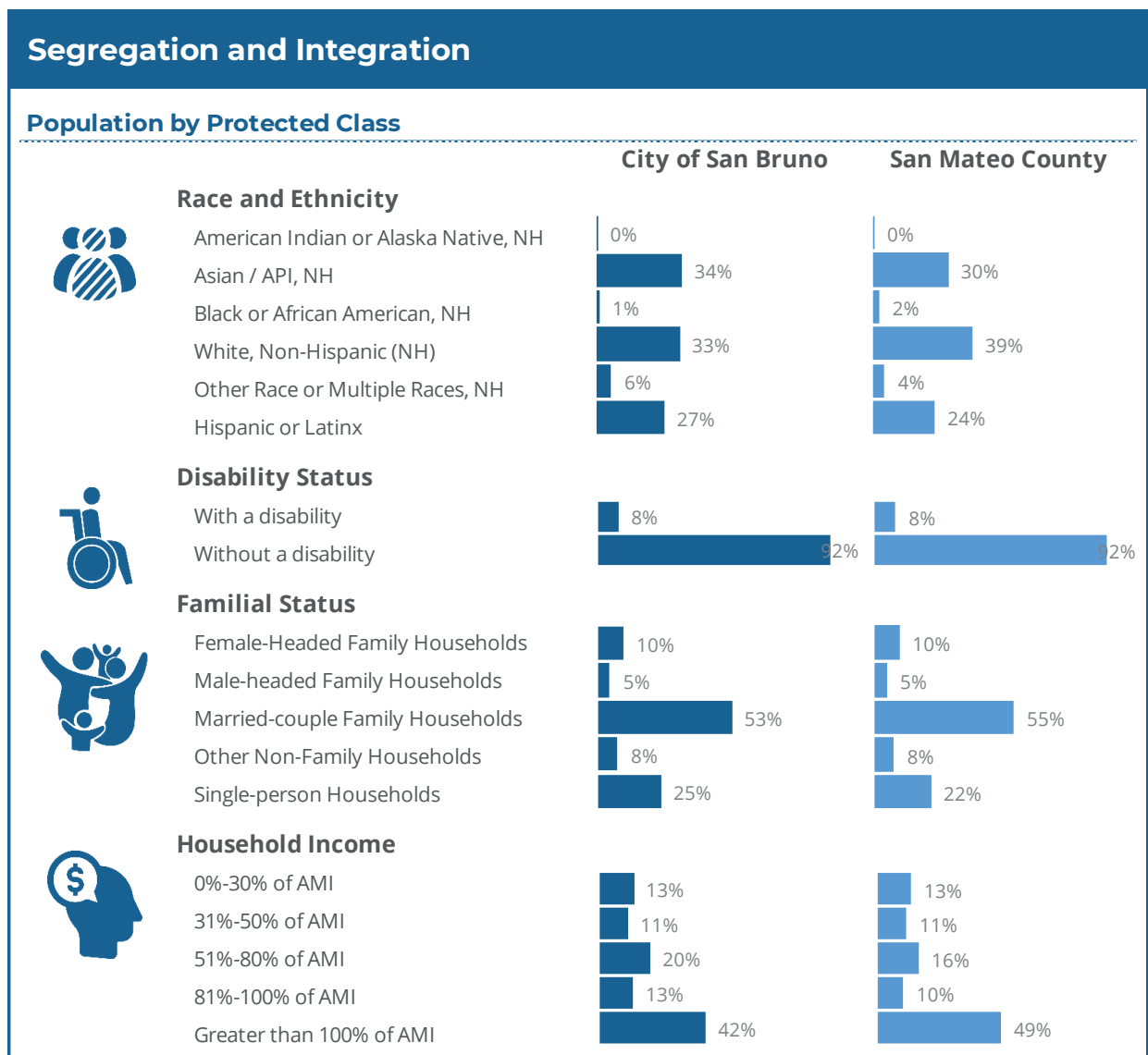
Familial status can indicate specific housing needs and preferences. A larger number of nonfamily or single person households indicates a higher share of seniors living alone, young adults living alone or with roommates, and unmarried partners. Higher shares of nonfamily households indicate an increased need for one and two bedroom units.

¹⁴ Redlining maps, otherwise known as Home Owners' Loan Corporation (HOLC) maps, are not available for San Mateo County.

Over 70% of married couple households and slim majority of residents living alone live in owner occupied housing (Figure II-19). **The number of housing units available by number of bedrooms and tenure is generally consistent with the familial status of the households that live in the City of San Bruno** (Figure II-16 and Figure II-20).

Compared to the county, the City of San Bruno has a slightly smaller proportion of family households and greater proportion of single person households—which is reflected in the number of bedrooms and tenure of the housing stock in the city (Figure II-19 and Figure II-20). The distribution of households by family type are mapped at the census tract level in Figures 21, 22, 23, and 24.

Household income. The household income distribution by percent of area median income (AMI) in the City of San Bruno is similar to the county (Figure II-25). However, the city has a smaller proportion of households making greater than 100% AMI (42%) than the county (49%). There are three census block groups in the city that have median incomes



below the 2020 state median income of \$87,100 for a family of four, but the majority of block groups have median incomes well above that (Figure II-26 and Figure II-27). There is a concentration of block groups west of Interstate 280 with median incomes greater than \$125,000. **All census tracts in the City of San Bruno have poverty rates below ten percent** (Figure II-28).

Racially or ethnically concentrated areas of poverty and affluence.

Racially Concentrated Area of Poverty or an Ethnically Concentrated Area of Poverty (R/ECAP) and Racially Concentrated Areas of Affluence (RCAAs) represent opposing ends of the segregation spectrum from racially or ethnically segregated areas with high poverty rates to affluent predominantly White neighborhoods. Historically, HUD has paid particular attention to R/ECAPs as a focus of policy and obligations to AFFH. Recent research out of the University of Minnesota Humphrey School of Public Affairs argues for the inclusion of RCAAs to acknowledge current and past policies that created and perpetuate these areas of high opportunity and exclusion.¹⁵

It is important to note that R/ECAPs and RCAAs are not areas of focus because of racial and ethnic concentrations alone. This study recognizes that racial and ethnic clusters can be a part of fair housing choice if they occur in a non-discriminatory market. Rather, R/ECAPs are meant to identify areas where residents may have historically faced discrimination and continue to be challenged by limited economic opportunity, and conversely, RCAAs are meant to identify areas of particular advantage and exclusion.

R/ECAPs

HCD and HUD's definition of a Racially/Ethnically Concentrated Area of Poverty is:

- A census tract that has a non-White population of 50 percent or more (majority-minority) or, for non-urban areas, 20 percent, AND a poverty rate of 40 percent or more; OR
- A census tract that has a non-white population of 50 percent or more (majority-minority) AND the poverty rate is three times the average tract poverty rate for the County, whichever is lower.

Source: California Department of Housing and Community Development Guidance, 2021.

¹⁵ Goetz, E. G., Damiano, A., & Williams, R. A. (2019). Racially Concentrated Areas of Affluence: A Preliminary Investigation. *Cityscape: A Journal of Policy Development and Research*, 21(1), 99–124

For this study, the poverty threshold used to qualify a tract as an R/ECAP was three times the average census tract poverty rate countywide—or 19.1%. In addition to R/ECAPs that meet the HUD threshold, this study includes edge or emerging R/ECAPs which hit two thirds of the HUD defined threshold for poverty—emerging R/ECAPs in San Mateo County have two times the average tract poverty rate for the county (12.8%).

In 2010 there were three Census tracts that qualified as R/ECAPs (19.4% poverty rate) in the county and 11 that qualified as edge R/ECAPs (13% poverty rate). None of the R/ECAPs were located in the City of San Bruno in 2010 (Figure II-29).

In 2019 there were two Census tracts that qualified as R/ECAPs (19.1% poverty rate) in the county and 14 that qualified as edge R/ECAPs (12.8% poverty rate). None of the R/ECAPs were located in the City of San Bruno in 2019 (Figure II-30). However, there was an edge R/ECAP located just northeast of the city border in South San Francisco.

[PLACEHOLDER] RCAAs. [ABAG/HCD data on RCAAs was not available at the time this report was prepared] HCD’s definition of a Racially Concentrated Area of Affluence is:

- A census tract that has a percentage of total white population that is 1.25 times higher than the average percentage of total white population in the given COG region, and a median income that was 2 times higher than the COG AMI.

SECTION III. Access to Opportunity

This section discusses disparities in access to opportunity among protected classes including access to quality education, employment, transportation, and environment.

Access to Opportunity

“Access to opportunity is a concept to approximate place-based characteristics linked to critical life outcomes. Access to opportunity oftentimes means both improving the quality of life for residents of low-income communities, as well as supporting mobility and access to ‘high resource’ neighborhoods. This encompasses education, employment, economic development, safe and decent housing, low rates of violent crime, transportation, and other opportunities, including recreation, food and healthy environment (air, water, safe neighborhood, safety from environmental hazards, social services, and cultural institutions).”

Source: California Department of Housing and Community Development Guidance, 2021, page 34.

The California Tax Credit Allocation Committee (TCAC) in collaboration with HCD developed a series of opportunity maps that help to identify areas of the community with good or

poor access to opportunity for residents. These maps were developed to align funding allocations with the goal of improving outcomes for low income residents—particularly children.

The opportunity maps highlight areas of highest resource, high resource, moderate resource, moderate resource (rapidly changing), low resource and high segregation and poverty. TCAC provides opportunity maps for access to opportunity in quality education, employment, transportation, and environment. Opportunity scores are presented on a scale from zero to one and the higher the number, the more positive the outcomes.

Education. TCAC's education score is based on math proficiency, reading proficiency, high school graduation rates, and the student poverty rate. According to TCAC's educational opportunity map, about half of the Census tracts in the City of San Bruno score between 0.5 and 0.75—opportunity scores are presented on a scale from zero to one and the higher the number, the more positive the outcomes (Figure III-1). All census tracts with this score are located west of Interstate 280. Conversely, the other half of Census tracts are all located **east of Interstate 280** and score between 0.25 and 0.5—meaning they **have lower education scores compared to the rest of the city**. This area also has higher lower economic opportunity scores, lower environmental scores, and higher social vulnerability compared to the rest of the city.

According to the Disparate Access to Educational Opportunities Appendix, the City of San Bruno is served by the San Mateo Union High School District and San Bruno Park Elementary School District. San Mateo Union increased enrollment by 16% from 2010 to 2020 while the elementary district enrollment decreased by 12% over the same time. However, **both districts lost students during the COVID pandemic**.

San Mateo Union enrollment by race and ethnicity is similar to the countywide distribution. However, there is a higher proportion of Asian students in San Mateo Union (23% compared to 17% countywide), a smaller proportion of Filipino students (5% compared to 8% countywide) and Hispanic students (32% compared to 38% countywide).

The San Bruno Park Elementary District has a high share of English learners compared to the countywide proportion (28% compared to 20% countywide) but a much smaller share of students who qualify for reduced lunch (18% compared to 29% countywide). Overall, **the elementary district is more diverse than the countywide average**.

Many high schoolers in the county met admission standards for a University of California (UC) or California State University (CSU) school. Of the high school districts in San Mateo County, San Mateo Union High had the second highest rate of graduates who met such admission standards at 68%, just behind Sequoia Union (69%). **Pacific Islander, Hispanic, and Black students in the San Mateo Union district were less likely to meet the admission standards**, with rates of 29%, 46%, and 46% respectively.

Although San Mateo Union High School has relatively low dropout rates—4% of students—compared to other districts in the county, **dropout rates among Hispanic (7%), Black (6%), and Pacific Islander (6%) students are higher.**

Employment. The top three industries by number of jobs in the City of San Bruno include **professional and managerial services, arts and recreation services, and health and educational services** (Figure III-2 and Figure III-3). The City of San Bruno has a lower job-to-household ratio when compared to the county at 1.07 and 1.59 respectively—which means there are fewer employment opportunities per household in the City of San Bruno (Figure III-4 and Figure III-5). The city also has a slightly higher unemployment rate of 6.7% compared to the county at 6.6% (Figure III-6).

TCAC's economic opportunity score is comprised of poverty, adult educational attainment, employment, job proximity, and median home value. The census tracts adjacent to Interstate 280 and west of Skyline Boulevard have the best economic scores (0.5-0.75) in the City of San Bruno (Figure III-7). The **lowest economic opportunity scores** in the city are within tracts **east of El Camino Real, as well as in the central and northwestern areas of the city.**

HUD's job proximity index shows that **job proximity varies widely in the City of San Bruno** (Figure III-8). On a scale from zero to 100 where 100 is the closest proximity to jobs the majority of the city scores between 40 and 60. However, all census tracts west of Skyline Boulevard have scores below 40 while all tracts in the eastern portion of the city have scores above 60.

Transportation. [TCAC's transportation opportunity score and maps were not available at the time of this report] This section provides a summary of the transportation system that serves the City of San Bruno and the broader region including emerging trends and data relevant to transportation access in the city. The San Mateo County Transit District acts as the administrative body for transit and transportation programs in the county including SamTrans and the Caltrain commuter rail. SamTrans provides bus services in San Mateo County, including Redi-Wheels paratransit service.

In 2018, the Metropolitan Transportation Commission (MTC), which covers the entire Bay Area, adopted a coordinated public transit and human services transportation plan. While developing the coordinated plan, the MTC conducted extensive community outreach about transportation within the area. That plan—which was developed by assessing the effectiveness of how well seniors, persons with disabilities, veterans, and people with low incomes are served—was reviewed to determine gaps in services in San Bruno and the county overall. Below is a summary of comments relevant to San Mateo County.

“San Mateo's [Paratransit Coordinating Council] PCC and County Health System, as well as the Peninsula Family Service Agency provided feedback. The most common themes expressed had to do with pedestrian and bicycle needs at specific locations throughout

the county, though some covered more general comments such as parked cars blocking sidewalk right-of-way and a desire for bike lanes to accommodate motorized scooters and wheelchairs. Transportation information, emerging mobility providers, and transit fares were other common themes.

While some comments related to the use of car share, transportation network companies (TNCs), or autonomous vehicles as potential solutions, other comments called for the increased accessibility and affordability of these services in the meantime.”¹⁶

A partnership between the World Institute on Disability and the MTC created the research and community engagement project TRACS (Transportation Resilience, Accessibility & Climate Sustainability). The project’s overall goal is to, “stimulate connection and communication between the community of seniors and people with disabilities together with the transportation system– the agencies in the region local to the San Francisco Bay, served by MTC.”¹⁷

As part of the TRACS outreach process, respondents were asked to share their compliments or good experiences with MTC transit. One respondent who had used multiple services said, **“it is my sense that SamTrans is the best Bay Area transit provider in terms of overall disability accommodation.”**

The San Mateo County Transit District updated their Mobility Plan for Older Adults and People with Disabilities in 2018. According to the district, the **county’s senior population is expected to grow more than 70% over the next 20 years and the district is experiencing unprecedented increases in paratransit ridership**. The plan is targeted at developing effective mobility programs for residents with disabilities and older adults including viable alternatives to paratransit, partnerships, and leveraging funding sources.¹⁸

MTC also launched Clipper START—an 18 month pilot project— in 2020 which provides fare discounts on single transit rides for riders whose household income is no more than double the federal poverty level.¹⁹

In 2013, the San Bruno City Council adopted the San Bruno Transit Corridors Specific Plan to revitalize commercial corridors located in proximity to the San Bruno Avenue Caltrain Station. This document articulates a vision that includes “...existing architecture and welcoming gateways, convenient transportation connections, pedestrian-oriented ‘green’

¹⁶ https://mtc.ca.gov/sites/default/files/MTC_Coordinated_Plan.pdf

¹⁷ <https://wid.org/transportation-accessibility/>

¹⁸

https://www.samtrans.com/Planning/Planning_and_Research/Mobility_Plan_for_Older_Adults_and_People_with_Disabilities.html

¹⁹ <https://mtc.ca.gov/planning/transportation/access-equity-mobility/clipperr-startsm>

streets, and more housing, jobs, shops, and restaurants, while maintaining a sense of the City's history."²⁰ Implementation efforts are currently underway.

Environment. TCAC's opportunity areas environmental scores are based on the CalEnviroScreen 3.0 indicators, which identify areas disproportionately vulnerable to pollution sources such as ozone, PM2.5, diesel PM, pesticides, toxic release, traffic, cleanup sites, groundwater threats, hazardous waste, impaired water bodies, and solid waste sites.

Environmental outcomes vary by Census tracts in the City of San Bruno . The majority of Census tracts have relatively positive environmental outcomes— these tracts are all located west of El Camino Real. The tracts east of El Camino Real have the lowest environmental scores in the city—primarily due to traffic on the highways, groundwater threats, and diesel particulate matter (Figure III-9 and Figure III-10).²¹ However, the **city scores moderately well compared to other areas of San Mateo County on the California Healthy Places Index (HPI)** developed by the Public Health Alliance of Southern California (PHASC) (Figure III-11). While the majority of tracts score between 80% and 100%, there are tracts in the northwest, central, and eastern areas of the city that have scores between 60% and 80%, **the same tracts that have low economic opportunity scores.**

The HPI includes 25 community characteristics in eight categories including economic, social, education, transportation, neighborhood, housing, clean environment, and healthcare.²²

Disparities in access to opportunity. Data show that racial and ethnic minorities are more likely to live in low resource areas compared to non-Hispanic White residents (Figure III-12). The distribution of racial and ethnic minorities in moderate and high resources areas is relatively similar. Nearly 40% of the population living in high resource areas are non-Hispanic White, compared to less than 20% in low resource areas. Conversely, **Hispanic and Other/Multiple race residents are more likely to live in low resource areas.** The share of the population with Limited English Proficiency (LEP) is 6% compared to 7% in the county (Figure III-13).

TCAC's composite opportunity score for the City of San Bruno shows Census tracts **west of Interstate 280 fall within high resource areas** while the rest of the city's Census tracts east of Interstate 280, west of El Camino Real, and south of Interstate 380 are within moderate resource areas. **The tracts east of El Camino Real are designated as low resource areas** (Figure III-14). The Social Vulnerability Index (SVI) provided by the Center

²⁰ <https://www.sanbruno.ca.gov/634/Transit-Corridors-Plan>

²¹ Specific environmental issues listed are sourced from: <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40>

²² <https://healthyplacesindex.org/about/>

for Disease Control (CDC)—which ranks census tracts based on their ability to respond to a disaster—includes four themes of socioeconomic status, household composition, race or ethnicity, and housing and transportation. Again, **the tract directly east of El Camino Real is most vulnerable according to the SVI** (Figure III-15).

The City of San Bruno has one disadvantaged community— **the tract directly east of El Camino Real and west of Huntington Avenue**— which is defined under SB 535 as, “the top 25% scoring areas from CalEnviroScreen along with other areas with high amounts of pollution and low populations.”²³

Disparities specific to the population living with a disability. Eight percent of the population in the City of San Bruno are living with at least one disability, same as the county (Figure III-17). The most common disabilities in the city are ambulatory (3.6%), independent living (3.4%), and cognitive (2.8%) (Figure III-18).

Disability

“**Disability types** include hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty.”

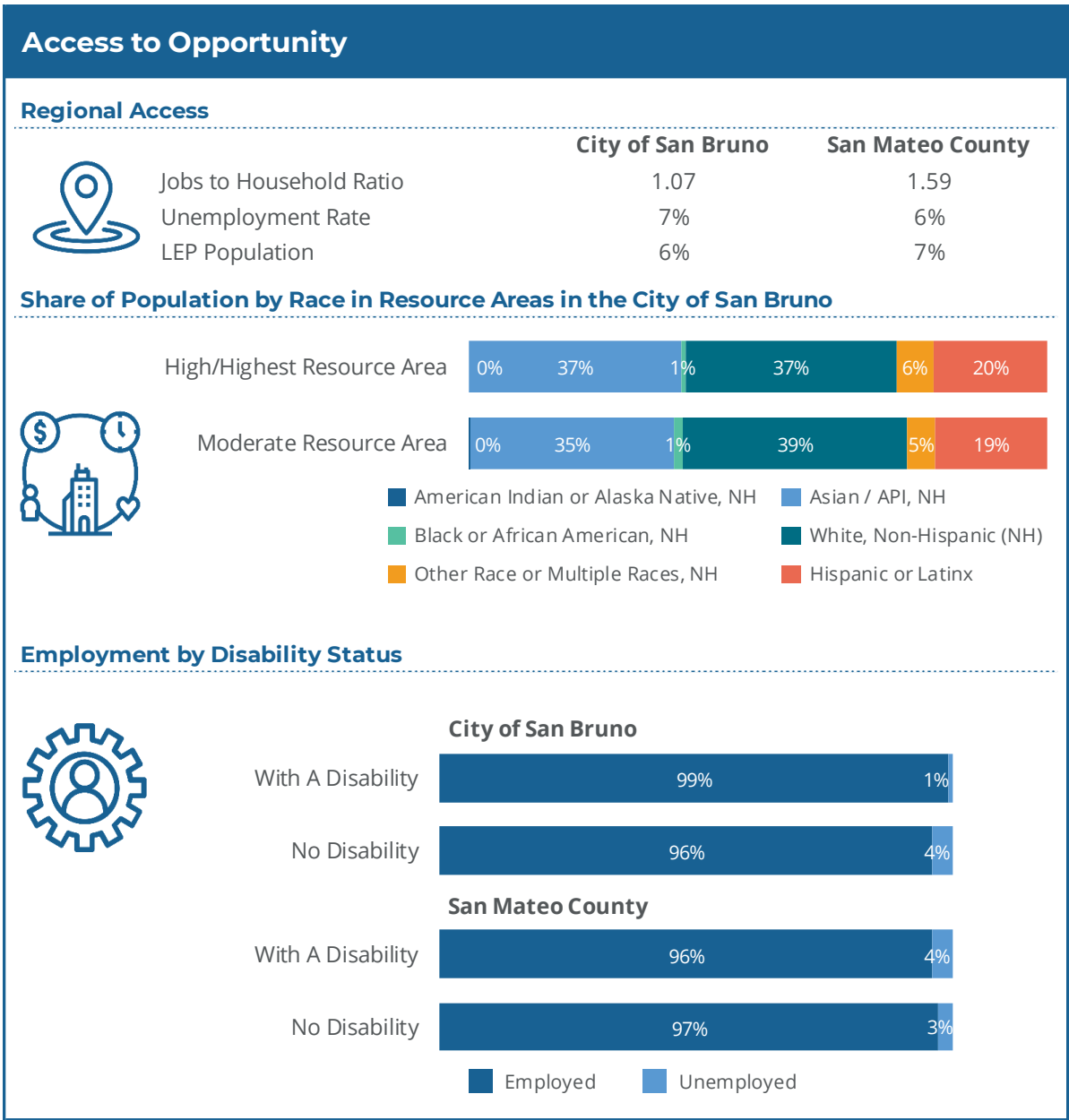
Source: California Department of Housing and Community Development Guidance, 2021, page 36.

For the population 65 and over, the share of the population with an ambulatory or independent living difficulty increases (Figure III-19). As mentioned above under access to transportation, San Mateo County is rapidly aging; therefore, this population with a disability is likely to increase.

Unemployment among residents living with a disability (1%) is lower compared with residents without a disability (4%) in the City of San Bruno (Figure III-20). Countywide, the unemployment rate for residents with a disability is 4%, compared to 3% for residents without a disability.

Residents with a disability are concentrated in the northwest area of the city (Figure III-21).

²³ <https://oehha.ca.gov/calenviroscreen/sb535>



SECTION IV. Disproportionate Housing Needs

This section discusses disparate housing needs for protected classes including cost burden and severe cost burden, overcrowding, substandard housing conditions, homelessness, displacement, and other considerations.

Disproportionate Housing Needs

“Disproportionate housing needs generally refers to a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing need when compared to the proportion of members of any other relevant groups, or the total population experiencing that category of housing need in the applicable geographic area. For purposes of this definition, categories of housing need are based on such factors as cost burden and severe cost burden, overcrowding, homelessness, and substandard housing conditions.”

Source: California Department of Housing and Community Development Guidance, 2021, page 39.

Housing needs. Population growth in the City of San Bruno has lagged behind the pace of growth countywide. The City of San Bruno experienced relatively sizable population decreases in 2000 and during the Great Recession. While population growth rebounded after the recession, it has remained relatively stagnant since 2016 (Figure IV-1).

Since 2015, **the housing that has received permits to accommodate growth has largely been priced for above moderate income households**, with 66 units permitted for above moderate income households compared to 55 permits for moderate very low households. Forty seven permits were issued for moderate income households while no permits were issued for low income households. (Figure IV-2) The Housing Needs Data Report for the City of San Bruno indicates new construction has not kept pace with demand throughout the Bay Area, “resulting in longer commutes, increasing prices, and exacerbating issues of displacement and homelessness.”²⁴

The variety of housing types available in the city in 2020 are predominantly single family (60%) and medium to large scale multifamily (35%). From 2010 to 2020, the multifamily

²⁴ Housing Needs Data Report: San Mateo, ABAG/MTC Staff and Baird + Driskell Community Planning, 2021.

inventory increased more than single family, however, the city has a greater share of detached single family housing compared to other communities in the region.²⁵

Over three quarters of the housing inventory in the City of San Bruno was constructed from 1940 to 1980 (Figure IV-3). As such, the city's units are older, lack energy efficiency, could be costly to adapt for disability accessibility, and may have deferred maintenance if households cannot afford to make improvements.

Compared to San Mateo County, the city's owner occupied housing market has a greater share of units priced between \$1 and \$1.5 million—32% of units in the city fall within this price range compared to 23% in the county (Figure IV-4). Conversely, units priced above \$2 million make up a smaller proportion of the city's housing stock compared to the county with 1% and 19% respectively. According to the Zillow home value index, home prices have experienced remarkable growth in the city and county (Figure IV-5).

Rents have increased at a slower pace compared to the for sale market—however, median rents increased more rapidly from 2017 to 2019 (Figure IV-7). Rent increases have likely been dampened by the COVID-19 pandemic. Compared to the county, the **City of San Bruno has fewer luxury rental units**—19% of units rent for more than \$3,000 in the city compared to 22% in the county (Figure IV-6).

Cost burden and severe cost burden. Forty six percent of all renter households in the City of San Bruno are cost burdened—spending more than 30% of their gross income on housing costs—and one in four are extremely cost burdened—spending more than 50% of their gross income on housing costs (Figure IV-9). Cost burdened households have less money to spend on other essentials like groceries, transportation, education, healthcare, and childcare. Extremely cost burdened households are considered at risk for homelessness.

A slightly greater portion of households in the City of San Bruno (38%) struggle with cost burden compared to the county (37%) (Figure IV-8). Lower income households are more likely to experience housing cost burden. Two out of every three households earning less than 30% AMI—considered extremely low income households—are severely cost burdened, compared to only 1% of households earning more than 100% of AMI (Figure IV-10).

There are **disparities in housing cost burden in the City of San Bruno by race and ethnicity and family size**. Hispanic (53%) and Black or African American households (46%) experience the highest rates of cost burden in the city. Non-Hispanic White (32%) and Asian (33%) households experience the lowest cost burden (Figure IV-11).

²⁵ Housing Needs Data Report: San Mateo, ABAG/MTC Staff and Baird + Driskell Community Planning, 2021.

Large family households—considered households with five or more persons—experience cost burden at a rate of 43% compared to all other households at 37% (Figure IV-12). Cost burdened renter households are primarily concentrated in the far west and east areas of the city (Figure IV-13 and Figure IV-14).

Overcrowding. The vast majority of households (92%) in the City of San Bruno are not overcrowded—indicated by more than one occupant per room (Figure IV-15). However, renter households are more likely to be overcrowded with 11% of households with more than one occupant per room compared to 6% of owner households (Figure IV-16).

Racial and ethnic minorities are more likely than non-Hispanic White households to experience overcrowding. Hispanic (12% of households), Other/Multiple race (11%), and Asian households (11%) experience the highest rates of overcrowding (Figure IV-17). While low income households have the greatest proportion of more than 1.5 occupants per room in the city, households making between 51% and 100% AMI have the greatest proportion of households with 1 to 1.5 occupants per room (Figure IV-18).

Geographically, overcrowded households are concentrated north and south of Interstate 380, as well as the areas east of El Camino Real (Figure IV-19).

Substandard housing. Data on housing condition are very limited, with the most consistent data available across jurisdictions found in the American Community Survey (ACS)—which captures units in substandard condition as self-reported in Census surveys. In the City of San Bruno, renter households are also more likely to have substandard kitchen and plumbing facilities compared to owner households. Generally, a low share of households are lacking kitchen or plumbing. For renters, 0.4% are lacking kitchen facilities while 0.1% are lacking plumbing. For owners, 0.1% are lacking plumbing facilities while no owner households lack kitchen facilities (Figure IV-20).

Homelessness. In 2019, 1,512 people were experiencing homelessness in the county during the One-Day Count, with 40% of people in emergency or transitional shelter while the remaining 60% were unsheltered. The majority of unsheltered people experiencing homelessness were in households without children. The majority of people in transitional housing were in households with children (Figure IV-21).

People who identify as American Indian or Alaskan Native (6% of the homeless population compared to less than 1% of the total population), Black (13%, 2%), White (67%, 51%), and Hispanic (38%, 28%) are overrepresented in the homeless population compared to their share of the general population (Figure IV-22 and Figure IV-23). People struggling with chronic substance abuse (112 people), severe mental illness (305), and domestic violence (127) represented a substantial share of the homeless population in 2019 (Figure IV-24).

Displacement. Owner households generally experience a greater amount of housing stability whereas renter households are more mobile (i.e., move more frequently). Households in the city were slightly less likely to have moved in the past year compared to the households in the county (11% compared to 12% in the county) (Figure IV-25 and Figure IV-26).

In the City of San Bruno **none of its income assisted rental units are at high or very high risk for displacement.** The City of San Bruno has 323 income assisted units, all designated as low risk for conversion. In San Mateo County, 417 units are at risk—8% of the total assisted housing units in the county (Figure IV-27).

Displacement Sensitive Communities

“According to the Urban Displacement Project, communities were designated sensitive if they met the following criteria:

- They currently have populations vulnerable to displacement in the event of increased redevelopment and drastic shifts in housing cost. Vulnerability is defined as:
 - Share of very low income residents is above 20%, 2017
 - AND
 - The tract meets two of the following criteria:
 - Share of renters is above 40%, 2017
 - Share of people of color is above 50%, 2017
 - Share of very low-income households (50% AMI or below) that are severely rent burdened households is above the county median, 2017
 - They or areas in close proximity have been experiencing displacement pressures. Displacement pressure is defined as:
 - Percent change in rent above county median for rent increases, 2012-2017
- OR
- Difference between tract median rent and median rent for surrounding tracts above median for all tracts in county (rent gap), 2017”

Source: <https://www.sensitivedcommunities.org>

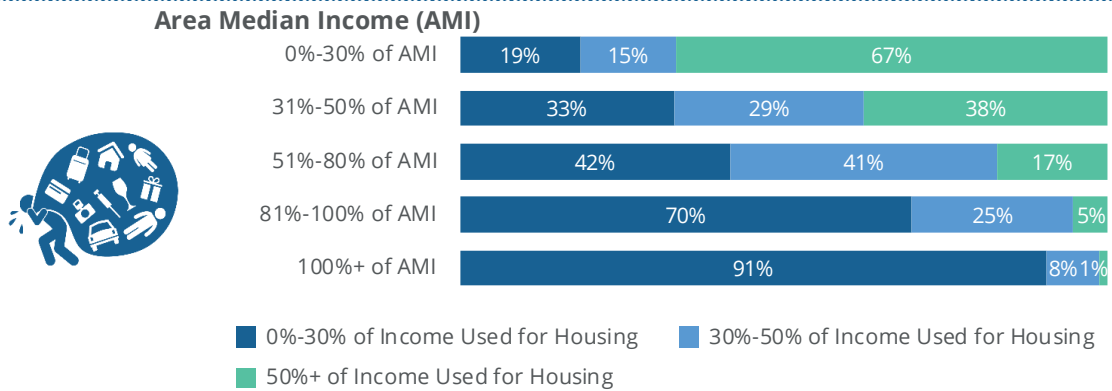
Five census tracts in the city are vulnerable to displacement—the majority of which have high shares of renter households (Figure IV-28). Additionally, **areas of the city with the highest cost burden and overcrowding—along the waterfront—are included in the Special Flood Hazard Areas determined by the Federal Emergency Management Agency (FEMA) as having a 1% chance of flooding annually** (Figure IV-29, IV-30 and IV-31).

Access to mortgage loans. Disparities by race and ethnicity are also prevalent for home mortgage applications, particularly in denial rates (Figure IV-32). **American Indian or Alaska Native (60% denial rate), Black or African American (36%), and Hispanic households (33%) had the highest denial rates for mortgage loan** applications in 2018 and 2019. Conversely, non-Hispanic Asian (21%) and White households (23%) have the lowest denial rates during the same time (Figure IV-33).

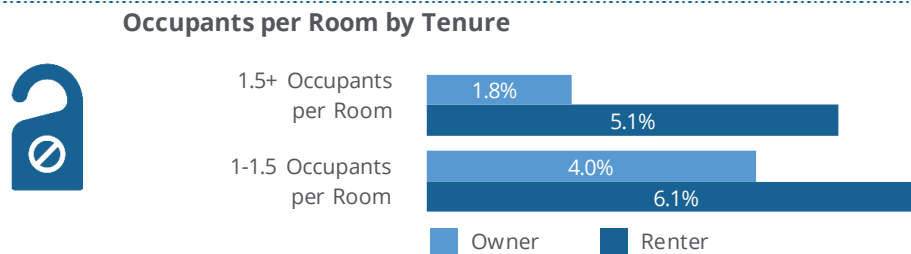
Zoning and land use.

Disproportionate Housing Needs

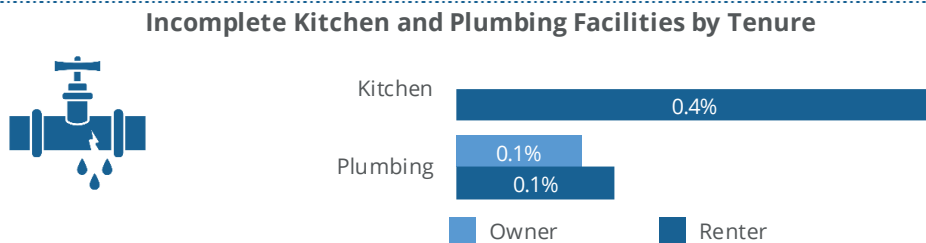
Cost Burden, City of San Bruno, 2019



Overcrowding, City of San Bruno, 2019



Substandard Housing, City of San Bruno, 2019



Homelessness, San Mateo County, 2019

Race and Ethnicity	Share of Homeless Population	Share of Overall Population
American Indian or Alaska Native	6%	0%
Asian / API	6%	30%
Black or African American	13%	2%
White	67%	51%
Other Race or Multiple Races	8%	17%

Displacement, 2020

Assisted Units at High or Very High Risk of Displacement	City of San Bruno	San Mateo County
Number of Units	0	417
% of Assisted Units	0%	8%

Placeholder for Site Inventory Analysis

AB 686 requires an analysis of sites identified to meet RHNA obligations for their ability to affirmatively further fair housing.

Once sites are identified, the analysis will be placed here and will consist of:

- Map of identified sites by lower income, moderate income, and above moderate income units;
- Identification of sites within or proximity to R/ECAPs and edge R/ECAPs and/or low income/poverty concentrations;
- Proportion of low and very low income units located in that area, as well as concentrations of Housing Choice Vouchers,
- How the distribution of lower, moderate, and above moderate income units—and the share located in low, moderate, and high resourced areas—will change with proposed site inventory development;
- Proximity to:
 - High proficiency K-12 education institutions;
 - High-resourced areas/positive economic outcome areas;
 - Low social vulnerability;
 - Good jobs proximity;
 - Access to transportation;
 - Healthy places; and
 - Flood hazards.

Appendix D

AFFH Map and Data Packet

SECTION I. Fair Housing Enforcement and Outreach Capacity

Figure I-1.

Fair Housing Assistance Organizations, San Mateo County

Name	Service Area	Address	Phone	Website
Project Sentinel	Northern California	1490 El Camino Real, Santa Clara, CA 95050	(800) 339-6043	https://www.housing.org/
Legal Aid Society of San Mateo County	San Mateo County	330 Twin Dolphin Drive, Suite 123, Redwood City, CA 94065	(650) 558-0915	https://www.legalaidsmc.org/housing-resources
Community Legal Services of East Palo Alto	East Palo Alto, Menlo Park, Burlingame, Mountain View, Redwood City, and San Francisco	1861 Bay Road, East Palo Alto, CA 94303	(650)-326-6440	https://clsepa.org/services/#housing

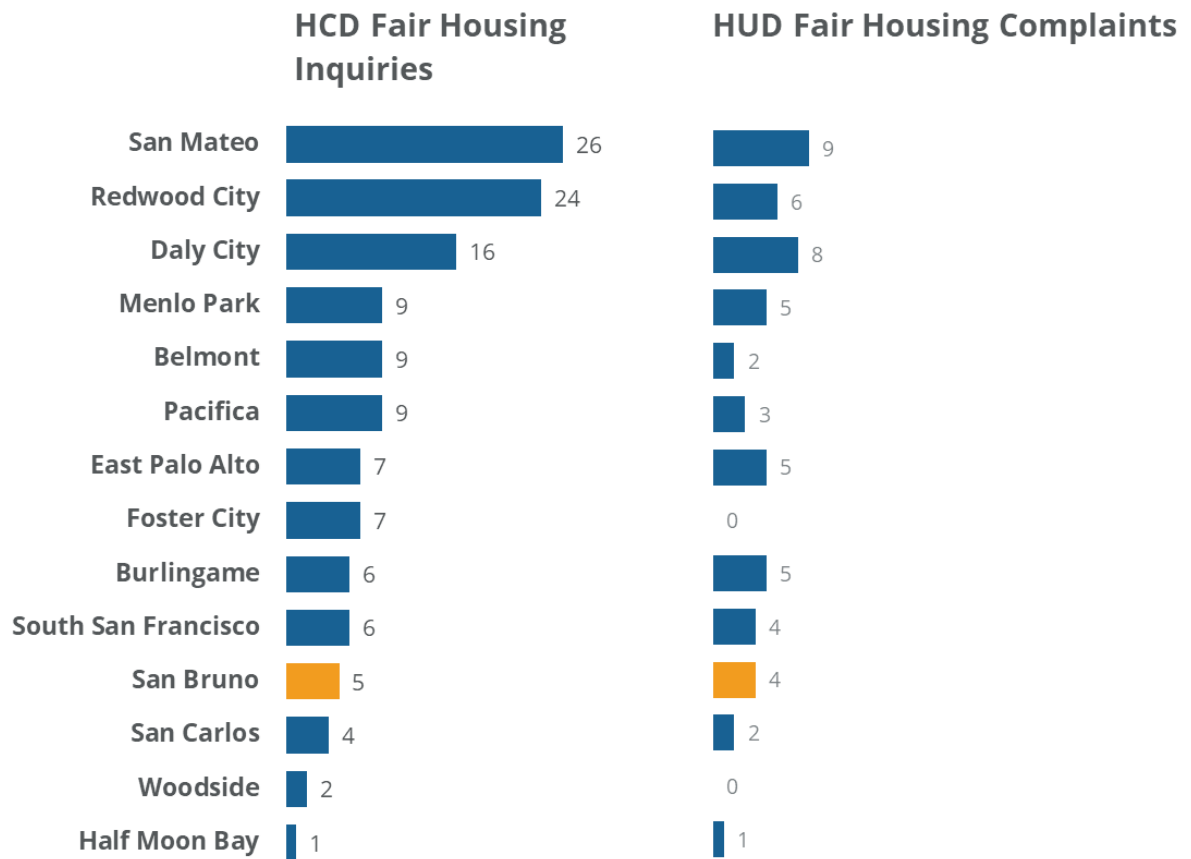
Source: Organization Websites

**Figure I-2.
Fair Housing
Complaints Filed
with HUD by
Basis, San Mateo
County, 2017-
2021**

Source:
HUD

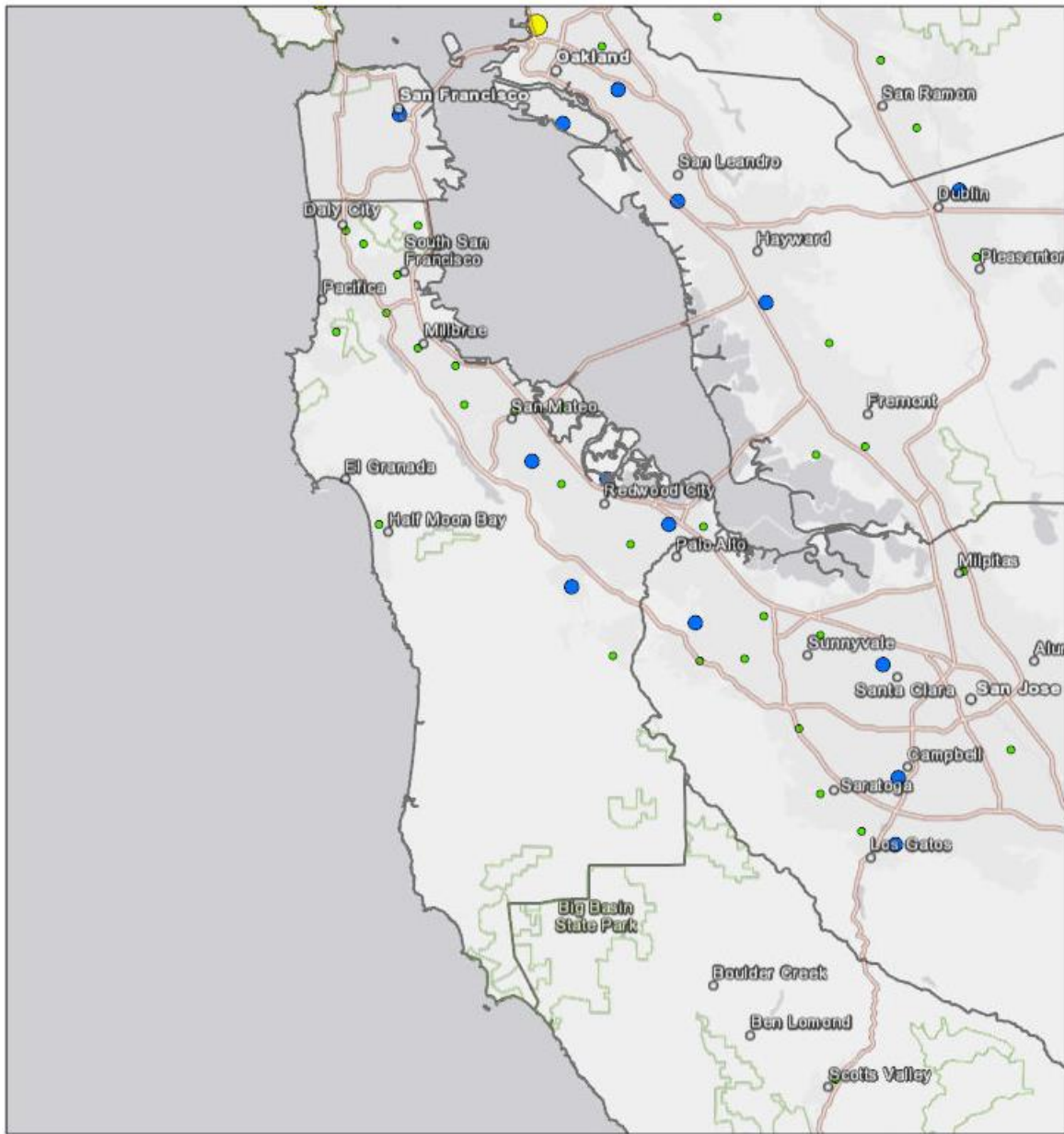
	2017	2018	2019	2020	2021	2017-2021 Total	
						Cases	% of Total
Disability	8	9	3	9	3	32	56%
Race	3	5	2	1		11	19%
Familial Status	4	3			1	8	14%
National Origin	2				1	3	5%
Religion		1		1		2	4%
Sex					1	1	2%
Total cases	17	18	5	11	6	57	100%

Figure I-3.
HCD Fair Housing Inquiries (2013- 2021) and HUD Fair Housing Complaints
(2017- 2021)



Source: Organization Websites

Figure I-4.
FHEO Inquiries by City to HCD, San Mateo County, 2013-2021



9/28/2021, 11:38:10 AM

County Boundaries

(R) FHEO Inquiries by City (HUD, 2013-2021)

- < .25 Inquiries
- < .5 Inquiries
- < 1 Inquiry

Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community, Esri, HERE, Garmin, USGS, EPA, NPS

CA HCD
Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing and

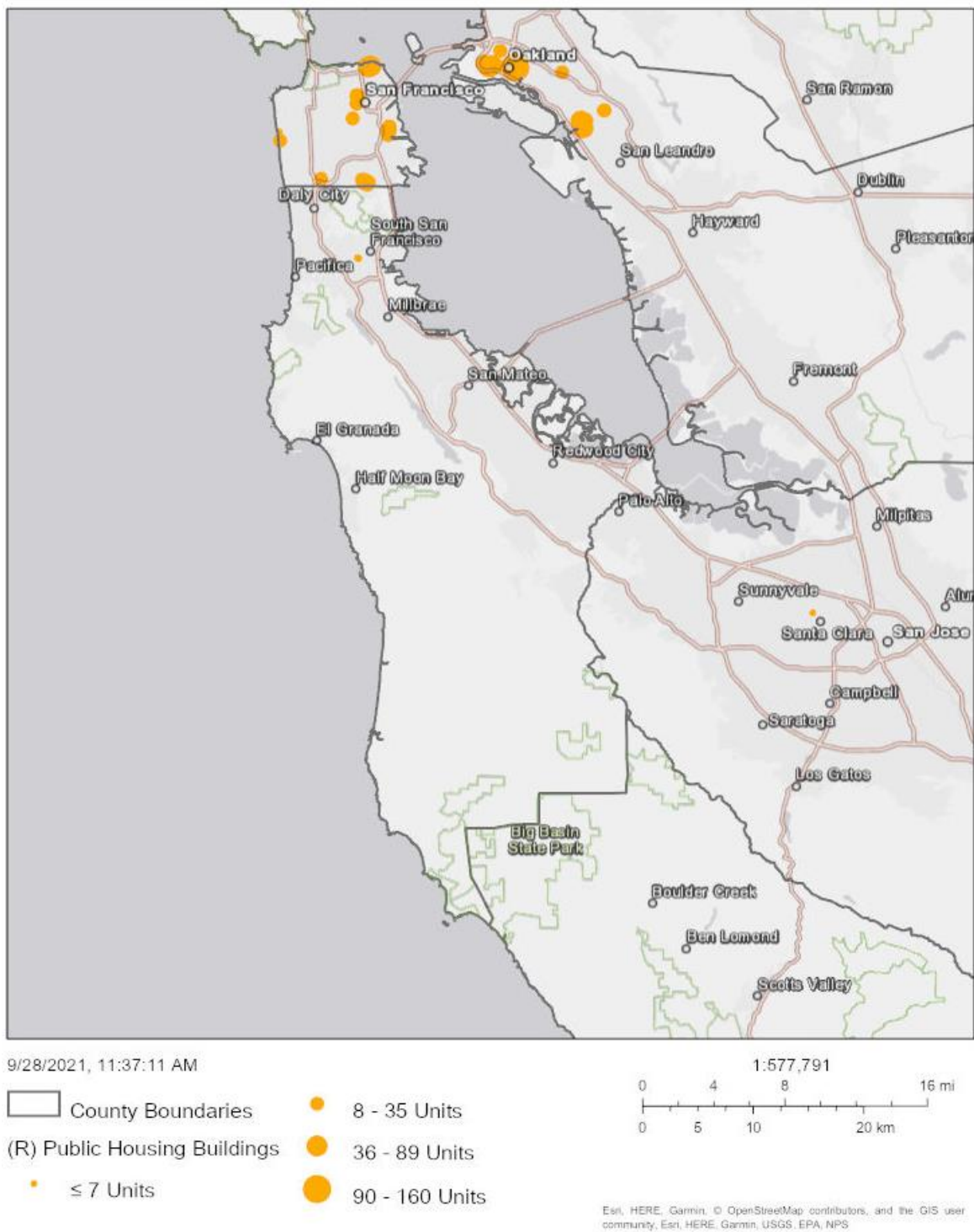
Source: California Department of Housing and Community Development AFFH Data Viewer

Figure I-5.
HCD Fair Housing Inquiries by Bias, January 2013-March 2021

Jurisdiction	Disability	Race	Familial Status	National Origin	Religion	Sex	Color	None Cited	Total
Atherton	0	0	0	0	0	0	0	0	0
Belmont	2	0	1	0	0	0	0	6	9
Brisbane	0	0	0	0	0	0	0	0	0
Burlingame	3	0	2	0	0	0	0	1	6
Colma	0	0	0	0	0	0	0	0	0
Daly City	1	2	1	3	0	0	0	9	16
East Palo Alto	1	1	0	0	0	0	0	5	7
Foster City	4	0	0	0	0	0	0	3	7
Half Moon Bay	0	0	0	0	0	0	0	1	1
Hillsborough	0	0	0	0	0	0	0	0	0
Menlo Park	3	0	0	0	0	1	0	5	9
Millbrae	0	0	0	0	0	0	0	0	0
Pacifica	3	0	0	1	0	1	0	4	9
Portola Valley	0	0	0	0	0	0	0	0	0
Redwood City	5	1	1	1	0	1	0	15	24
San Bruno	0	0	0	0	0	0	0	5	5
San Carlos	1	0	1	0	0	0	0	2	4
San Mateo	4	2	2	2	0	0	0	16	26
South San Francisco	0	0	0	1	0	0	0	5	6
Woodside	0	0	0	0	0	0	0	2	2

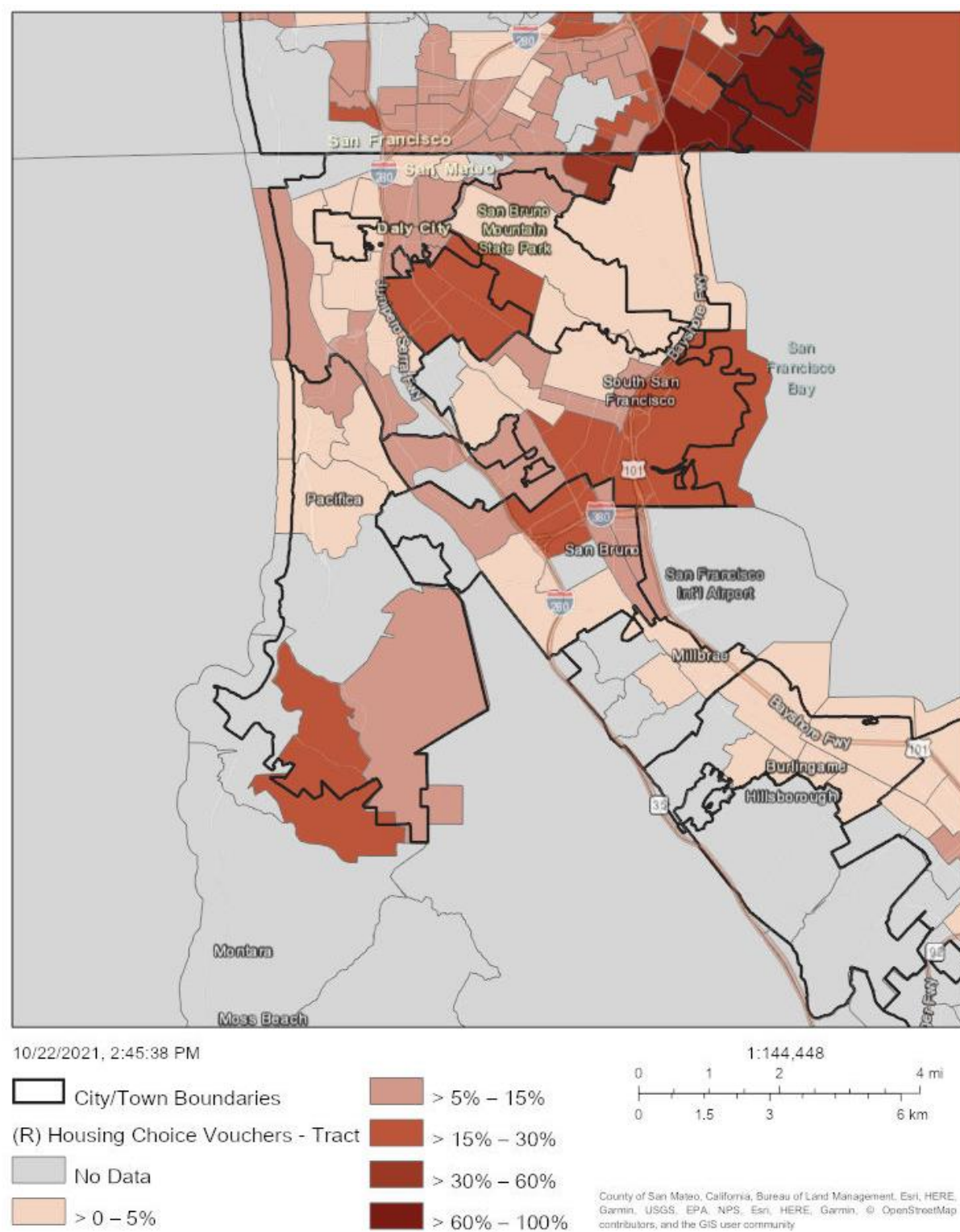
Source: California Department of Housing and Community Development AFFH Data Viewer

Figure I-6.
Public Housing Buildings, San Mateo County



Source: California Department of Housing and Community Development AFFH Data Viewer

Figure I-7.
Housing Choice Vouchers by Census Tract

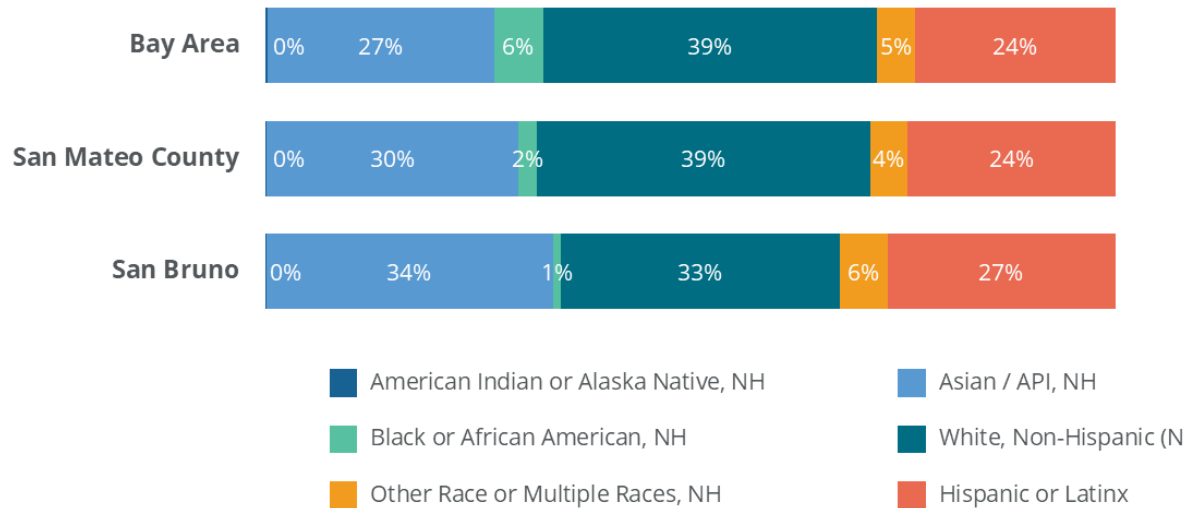


SECTION II. Integration and Segregation

Race and ethnicity.

Figure II-1.

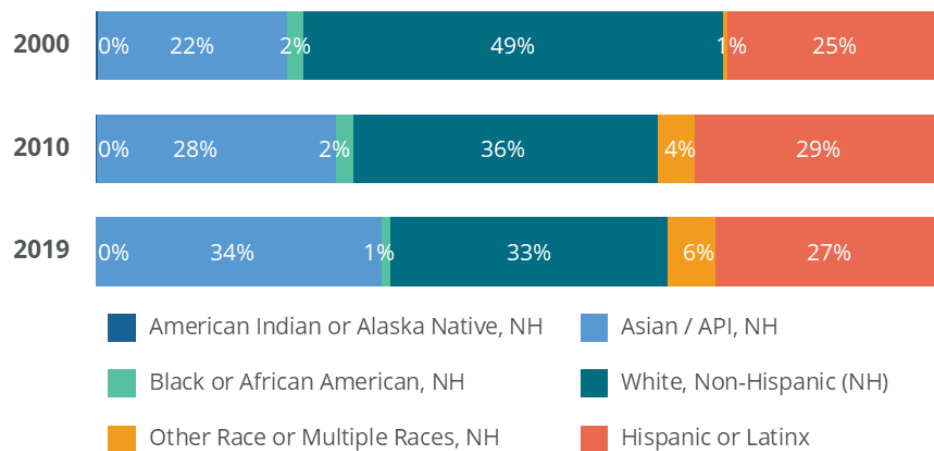
Population by Race and Ethnicity, 2019



Source: ABAG Housing Needs Data Workbook

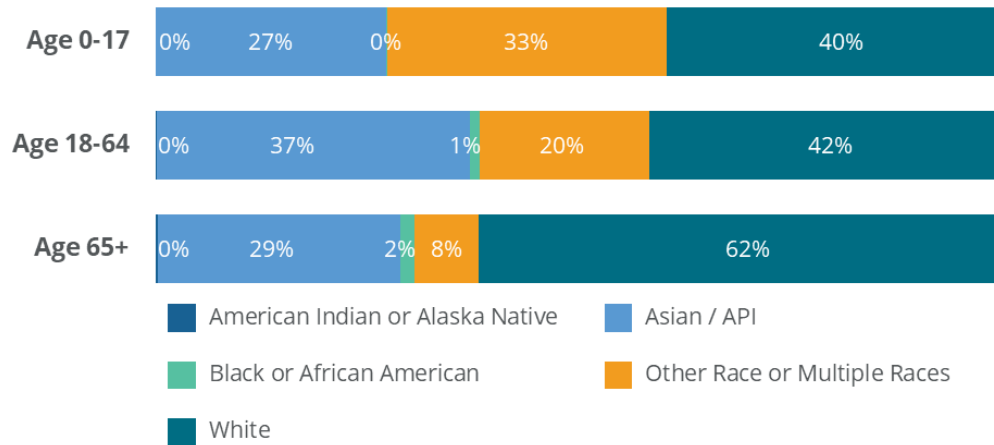
Figure II-2.

Population by Race and Ethnicity, City of San Bruno, 2000-2019



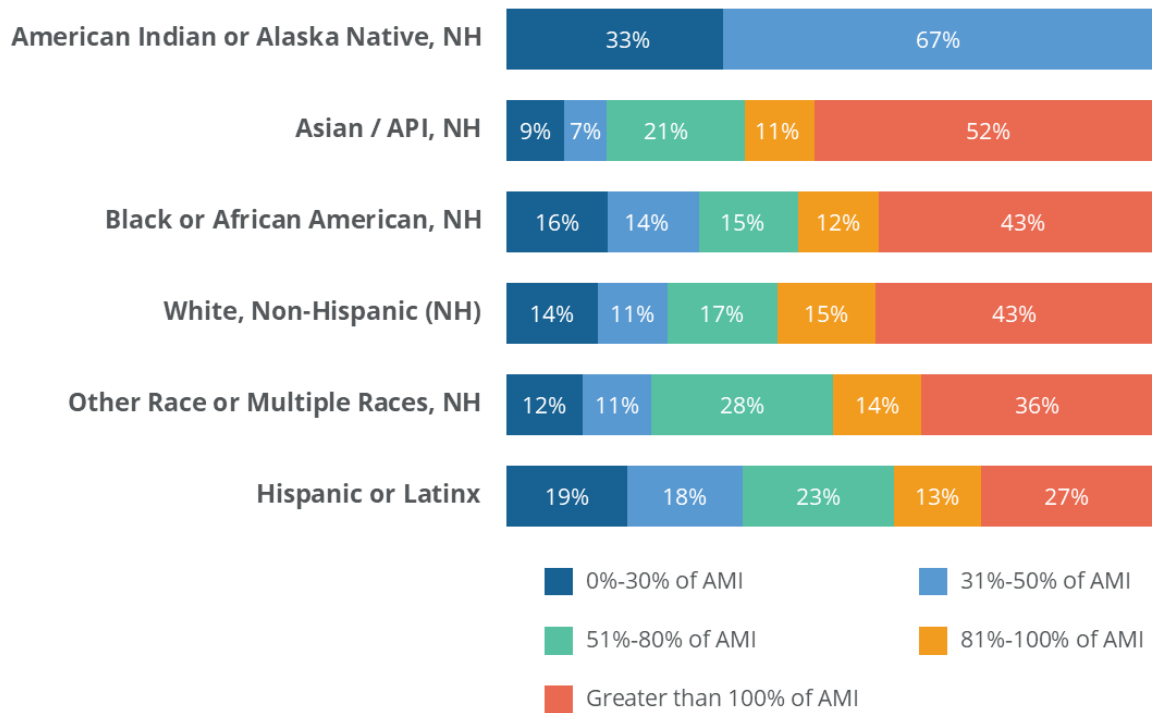
Source: ABAG Housing Needs Data Workbook

Figure II-3.
Senior and Youth Population by Race, City of San Bruno, 2000-2019



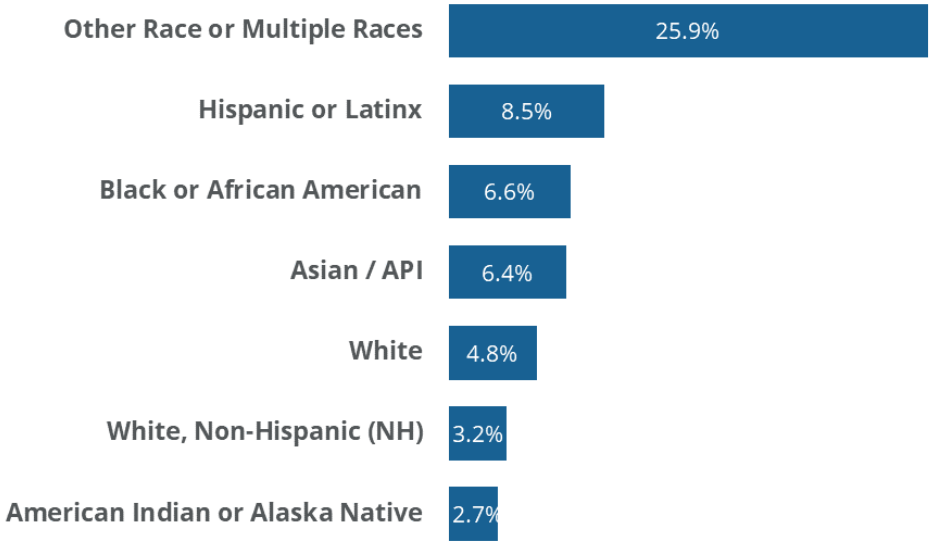
Source: ABAG Housing Needs Data Workbook

Figure II-4.
Area Median Income by Race and Ethnicity, City of San Bruno, 2019



Source: ABAG Housing Needs Data Workbook

Figure II-5.
Poverty Rate by Race and Ethnicity, City of San Bruno, 2019



Source: ABAG Housing Needs Data Workbook

Figure II-6.
% Non-White Population by Census Block Groups, 2018

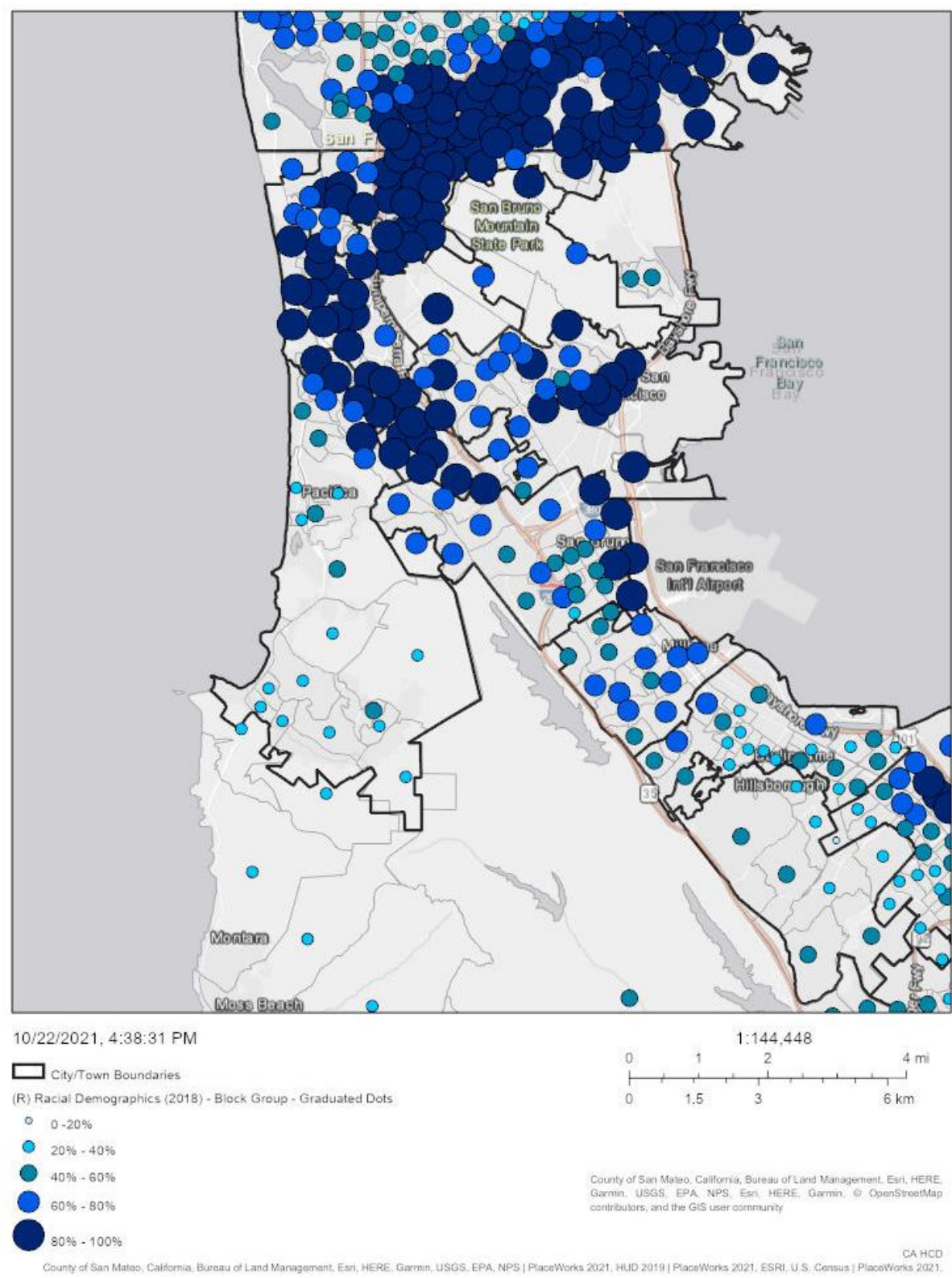
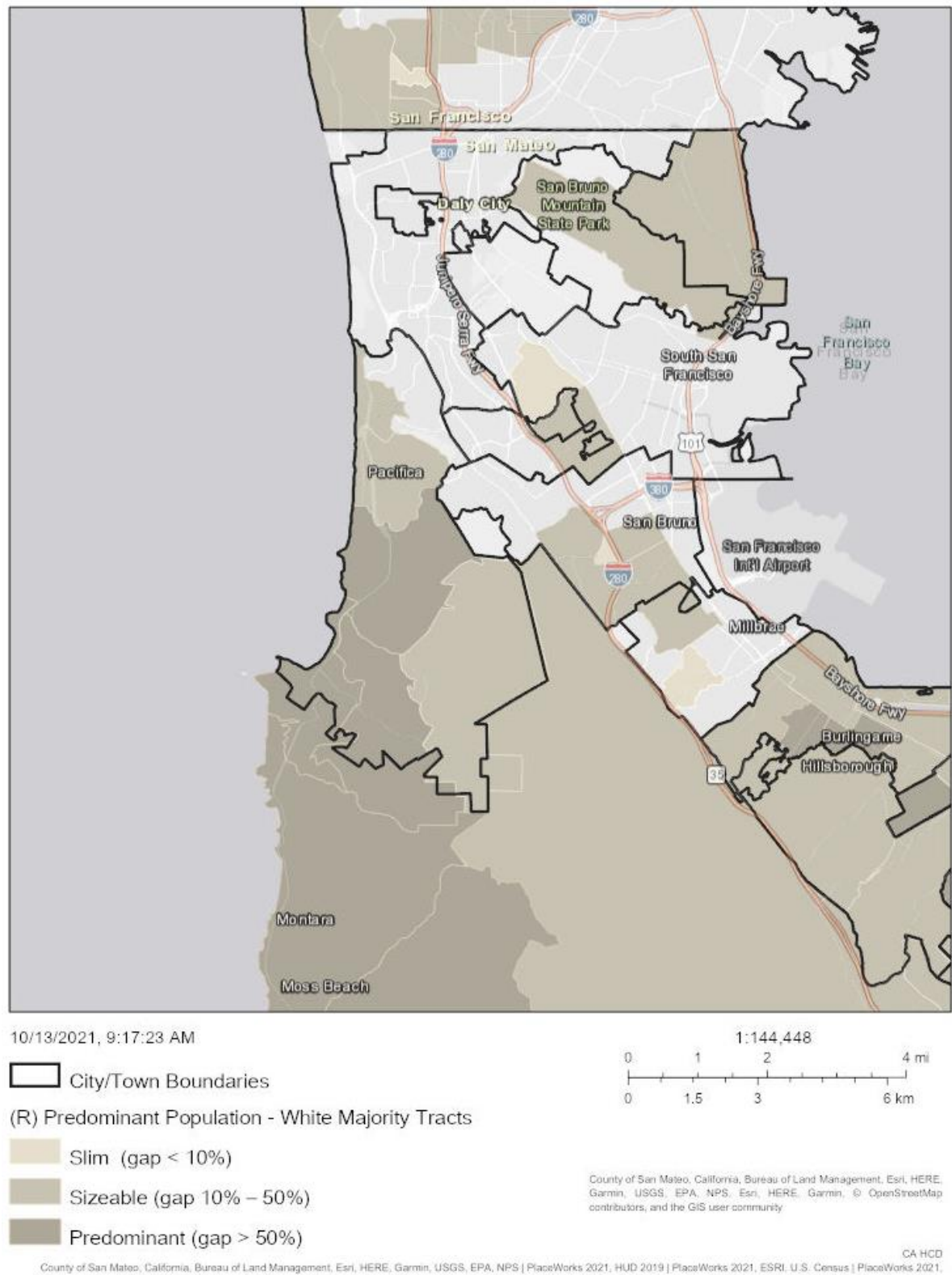
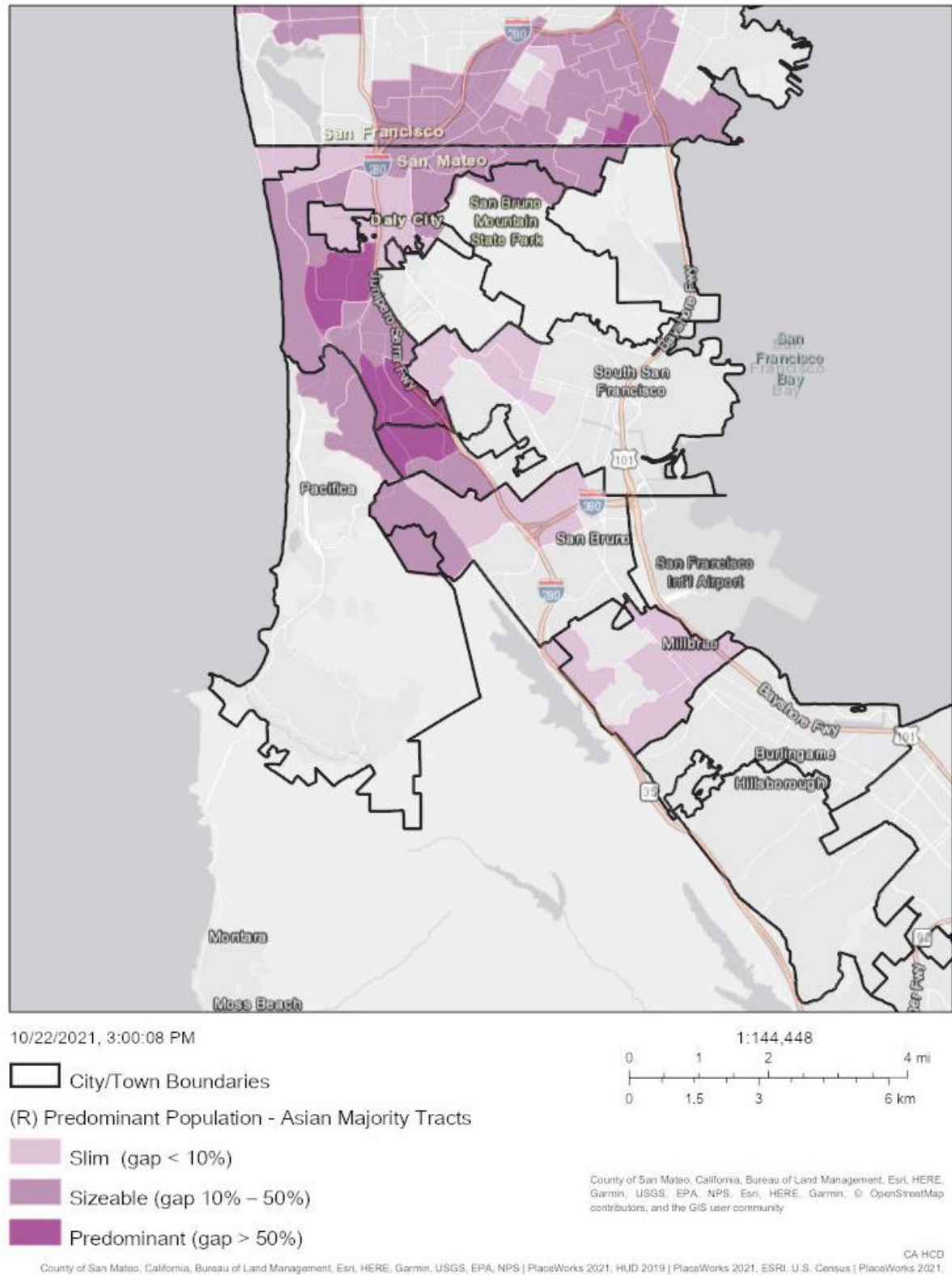


Figure II-7.
White Majority Census Tracts



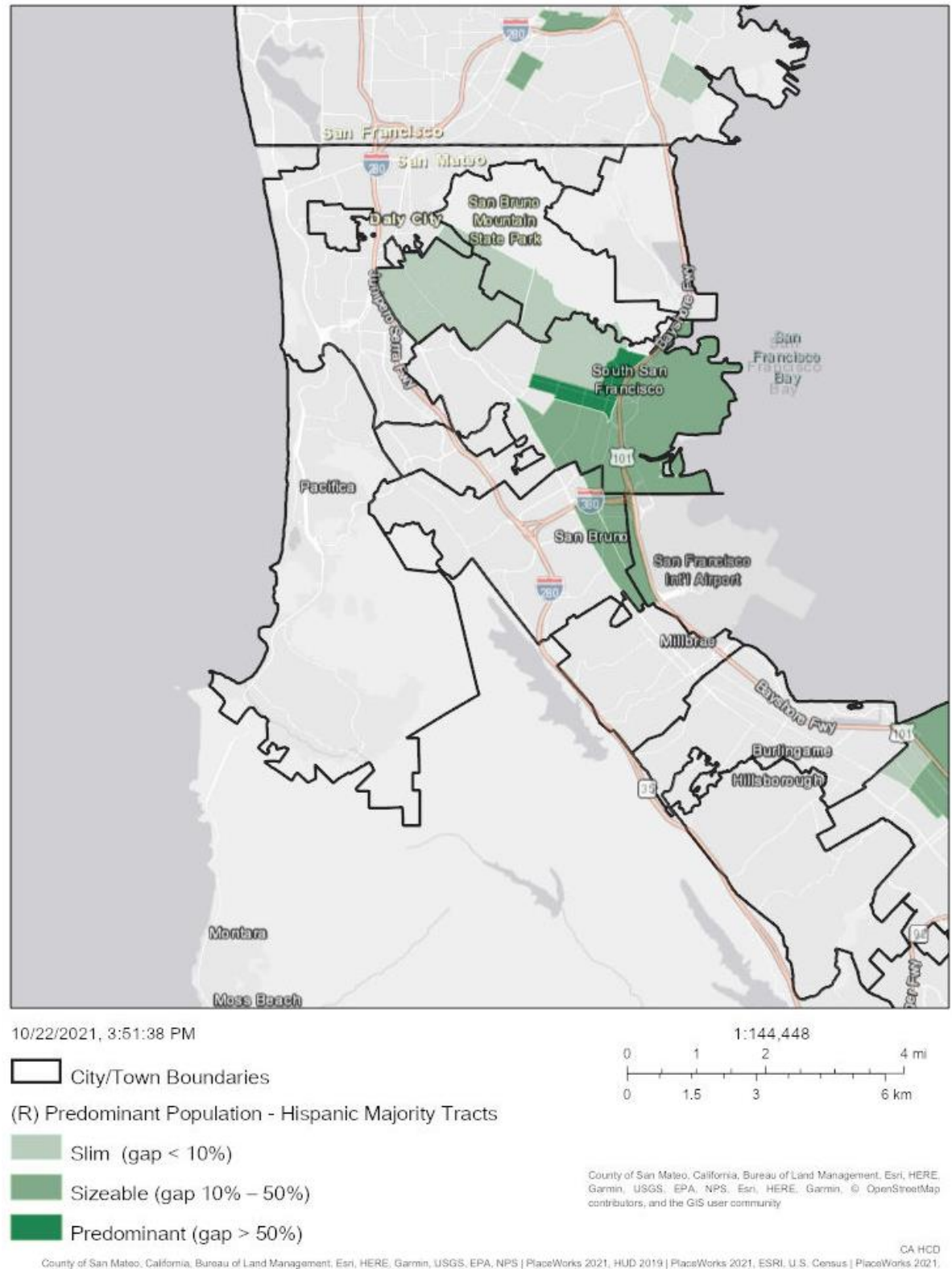
Source: California Department of Housing and Community Development AFFH Data Viewer

Figure II-8.
Asian Majority Census Tracts



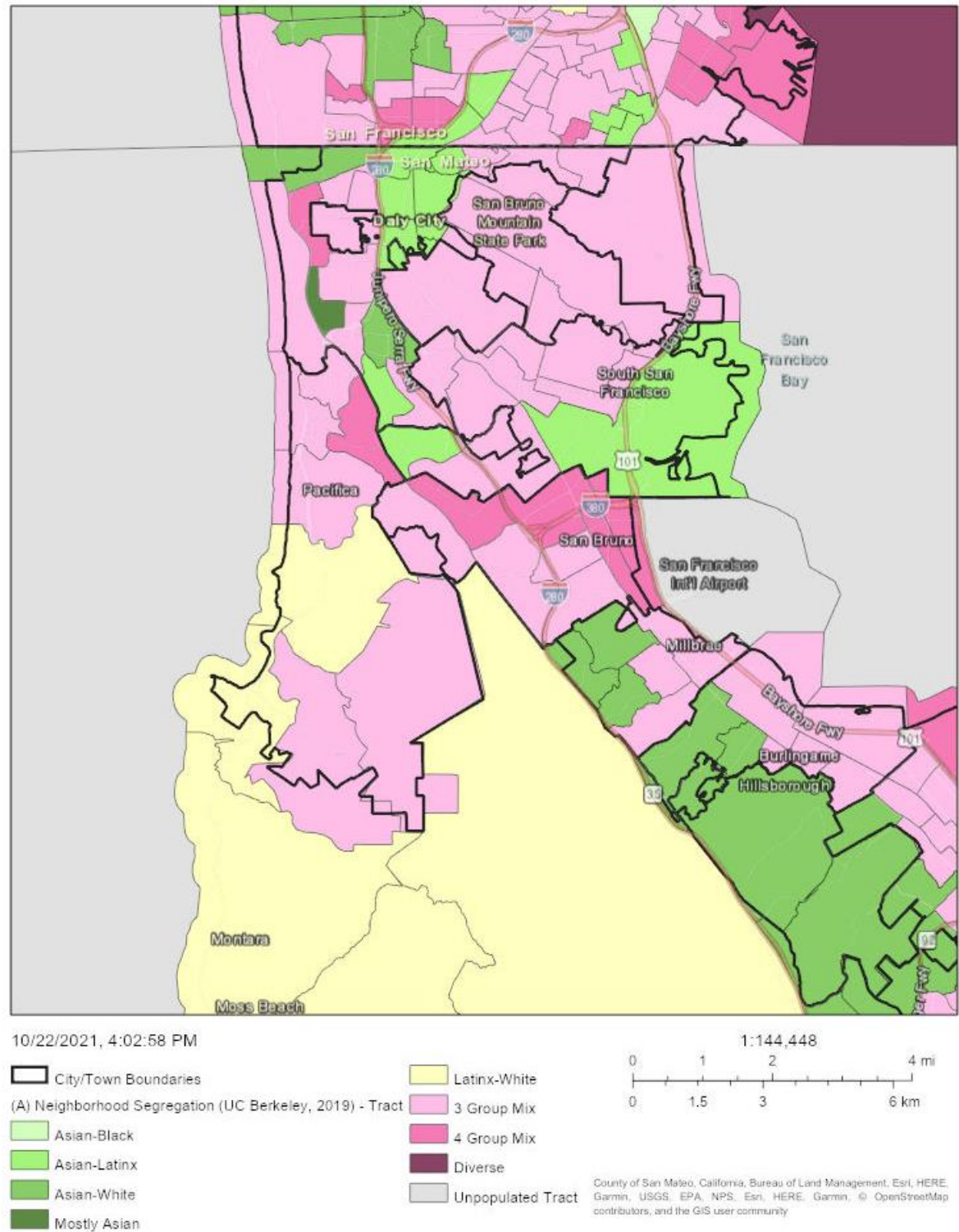
Source: California Department of Housing and Community Development AFFH Data Viewer

Figure II-9.
Hispanic Majority Census Tracts



Source: California Department of Housing and Community Development AFFH Data Viewer

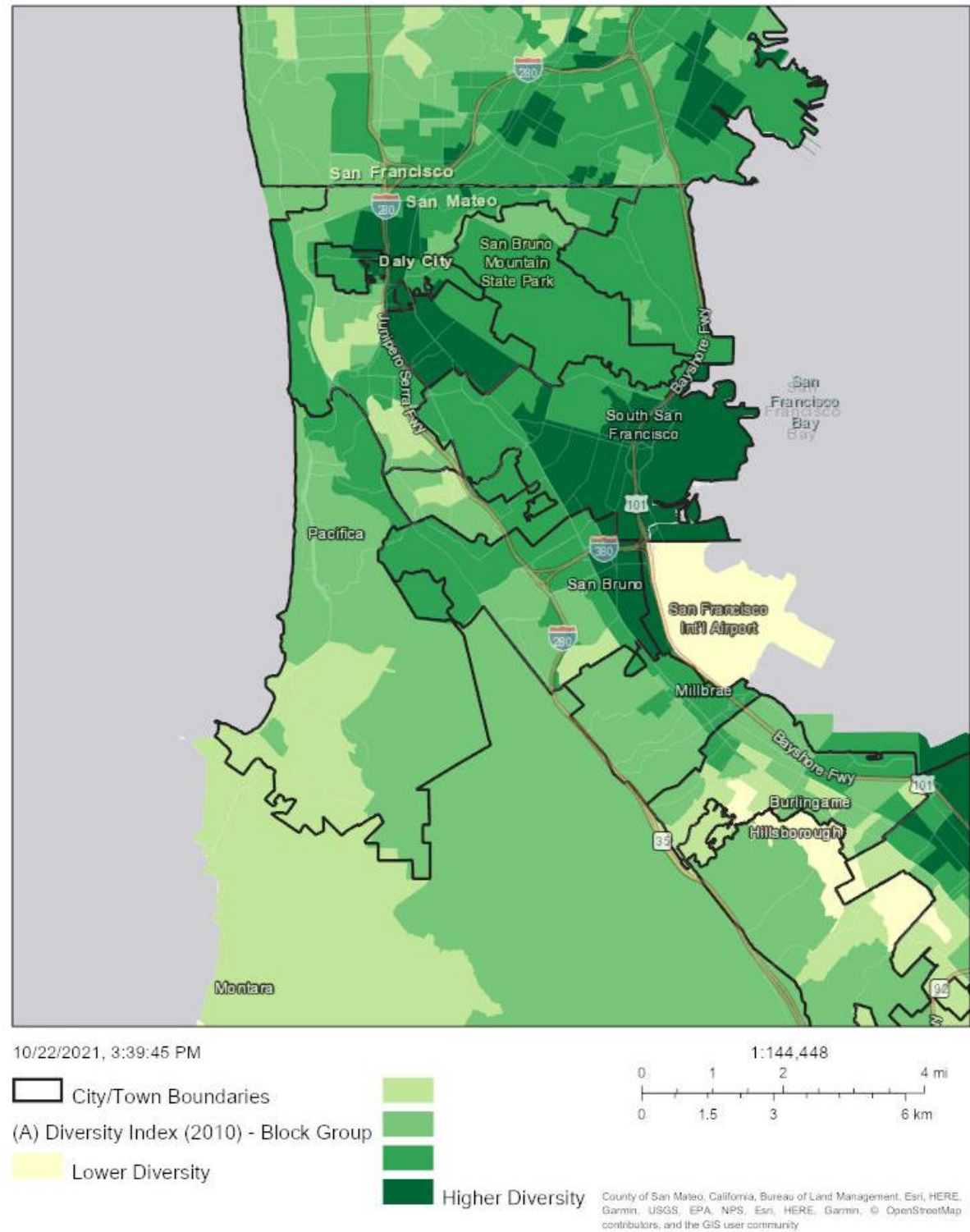
Figure II-10.
Neighborhood Segregation by Census Tract, 2019



CA HCD
County of San Mateo, California, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021.

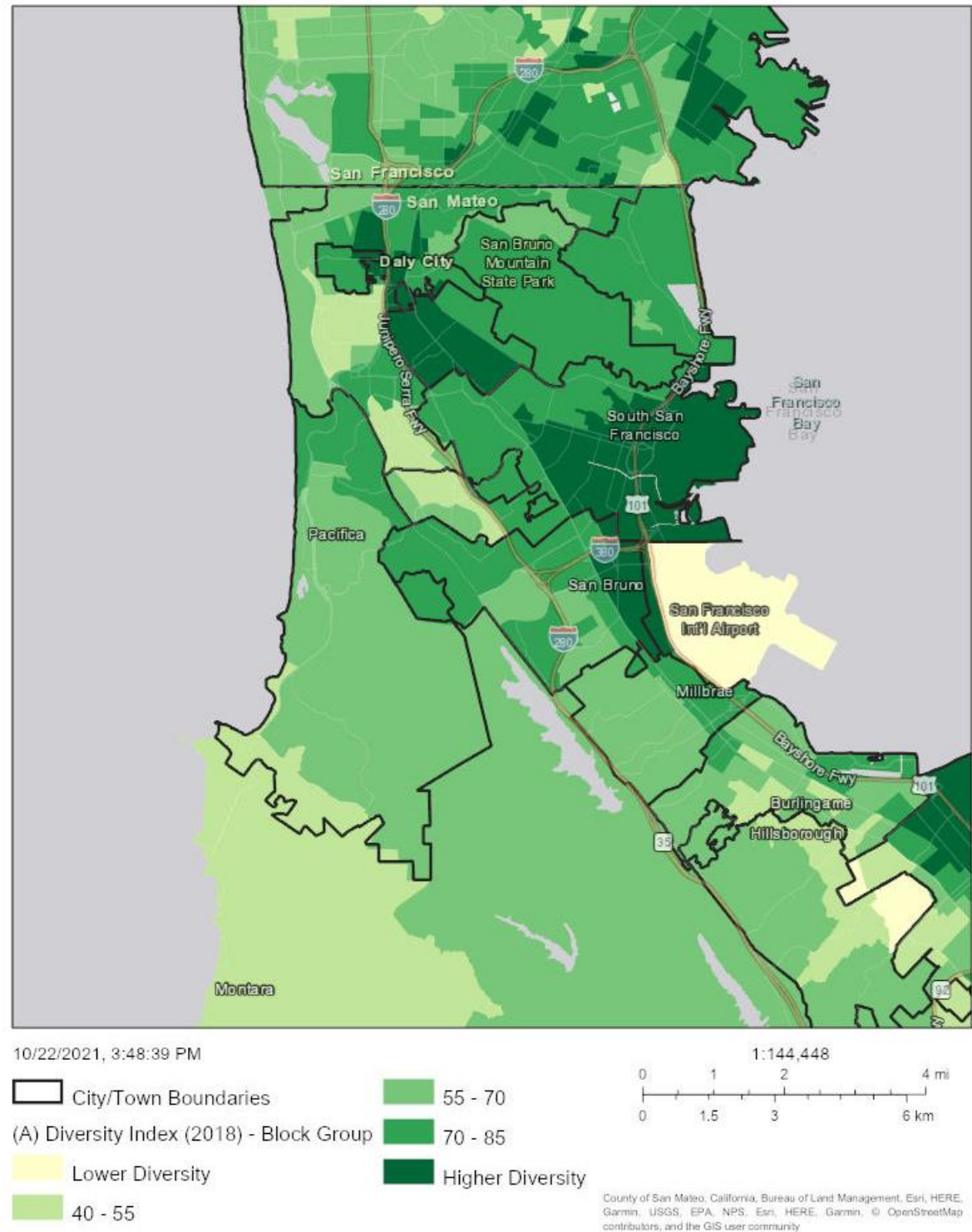
Source: California Department of Housing and Community Development AFFH Data Viewer

Figure II-11.
Diversity Index by Block Group, 2010



CA HCD
County of San Mateo, California, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021.

Figure II-12.
Diversity Index by Block Group, 2018

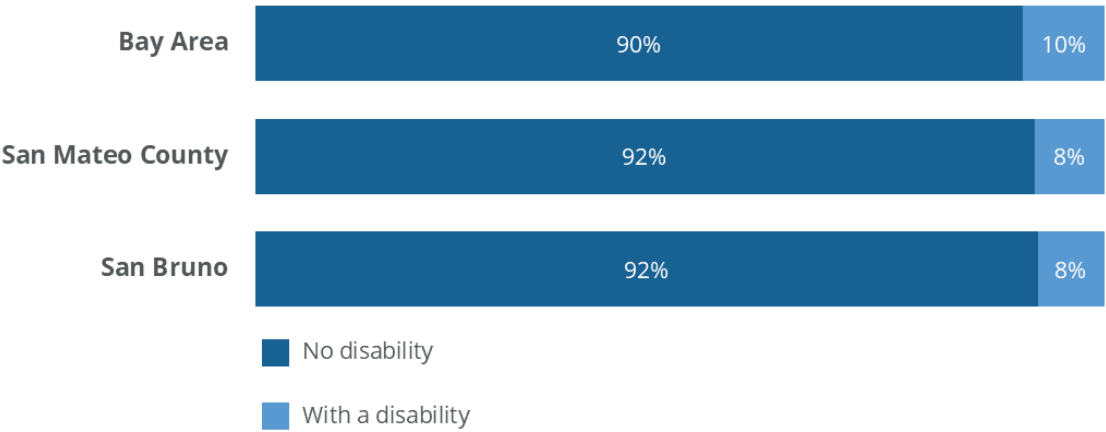


Source: California Department of Housing and Community Development AFFH Data Viewer

Disability status.

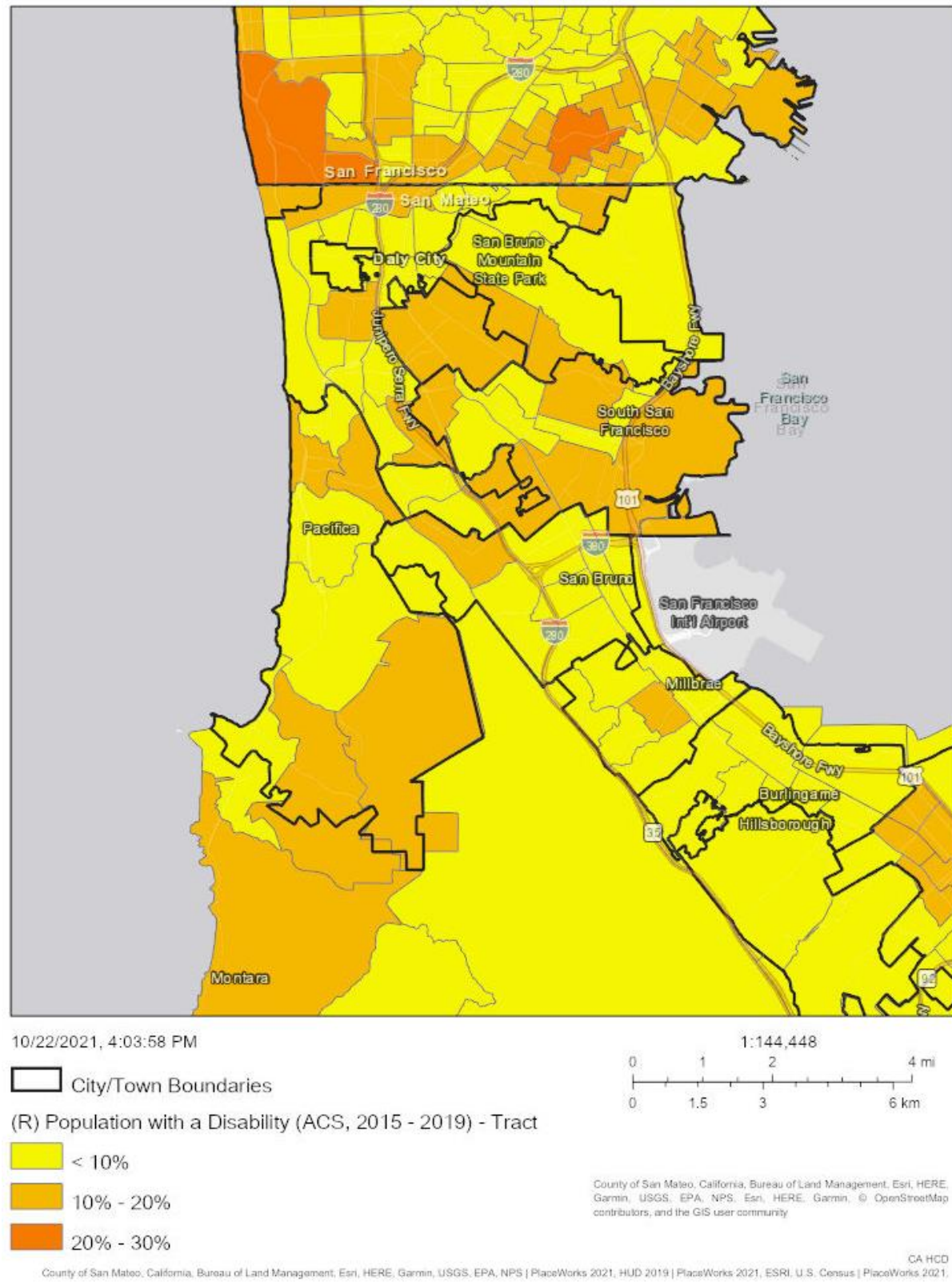
Figure II-13.

Share of Population by Disability Status, 2019



Source: ABAG Housing Needs Data Workbook

Figure II-14.
% of Population with a Disability by Census Tract, 2019

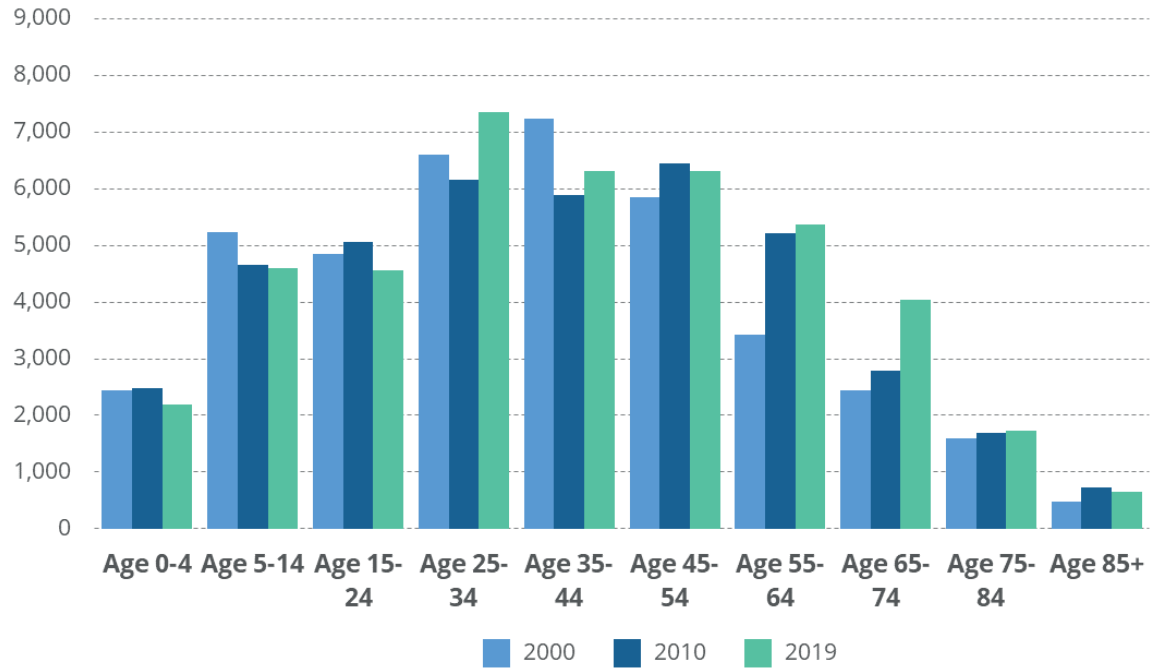


Source: California Department of Housing and Community Development AFFH Data Viewer

Familial status.

Figure II-15.

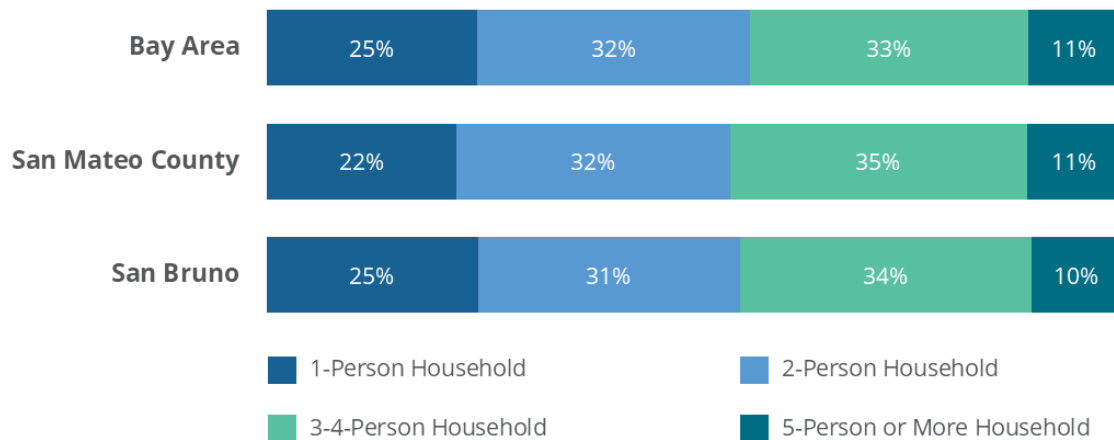
Age Distribution, City of San Bruno, 2000-2019



Source: ABAG Housing Needs Data Workbook

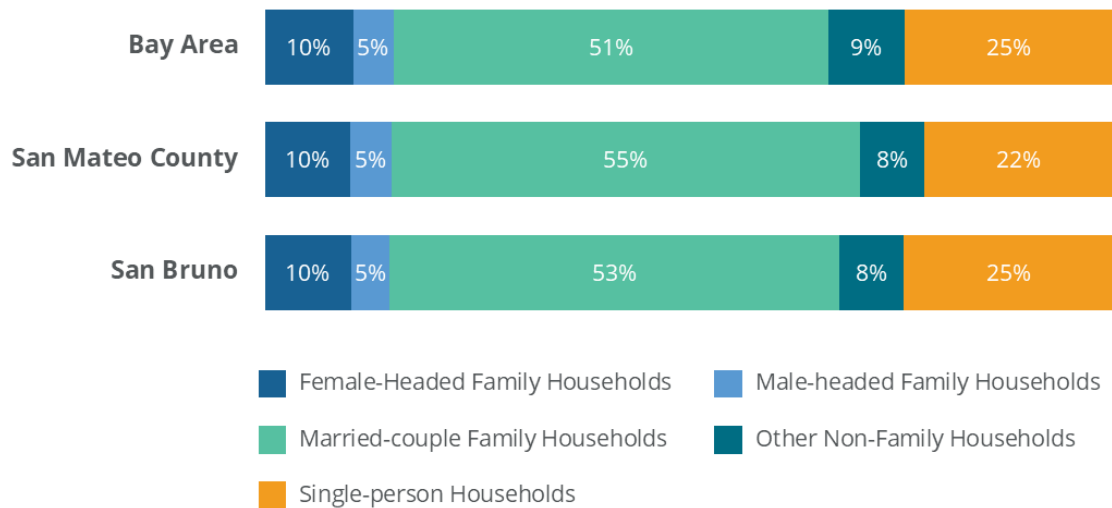
Figure II-16.

Share of Households by Size, 2019



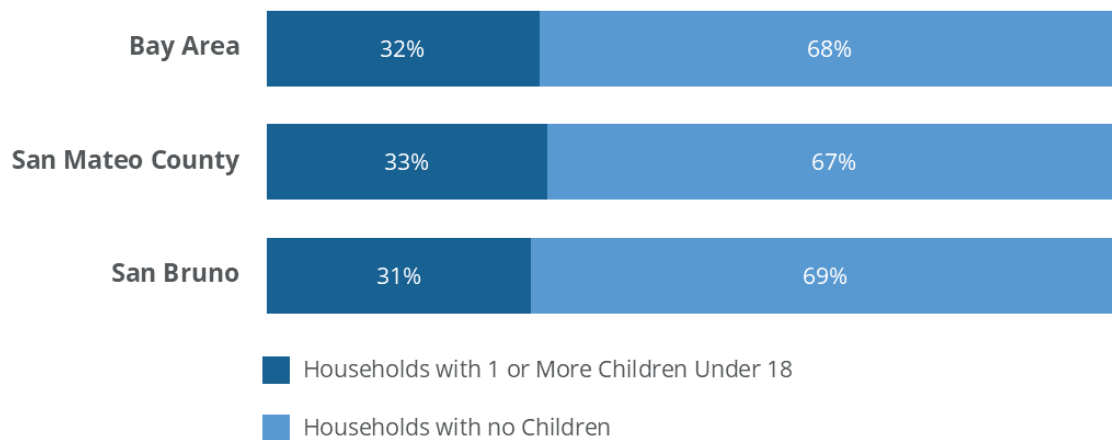
Source: ABAG Housing Needs Data Workbook

Figure II-17.
Share of Households by Type, 2019



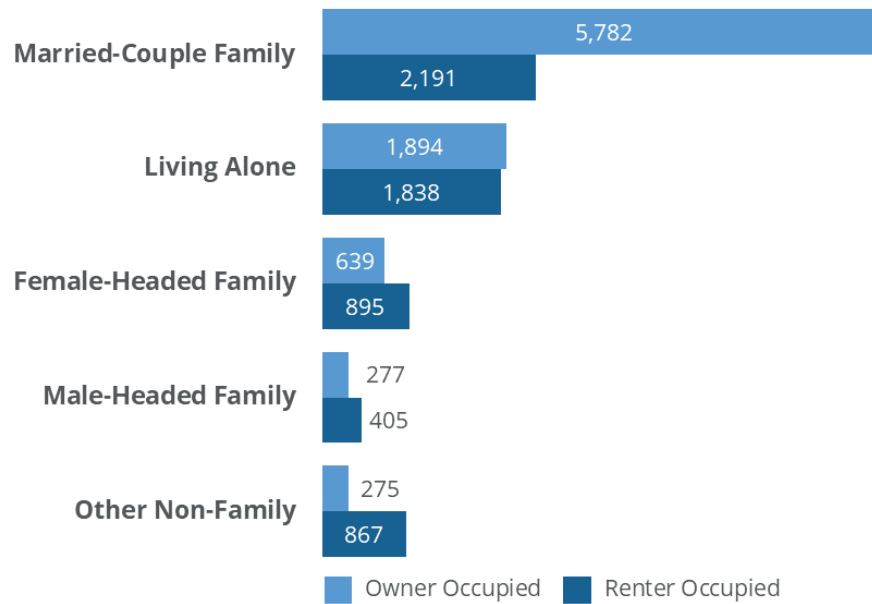
Source: ABAG Housing Needs Data Workbook

Figure II-18.
Share of Households by Presence of Children (Less than 18 years old), 2019



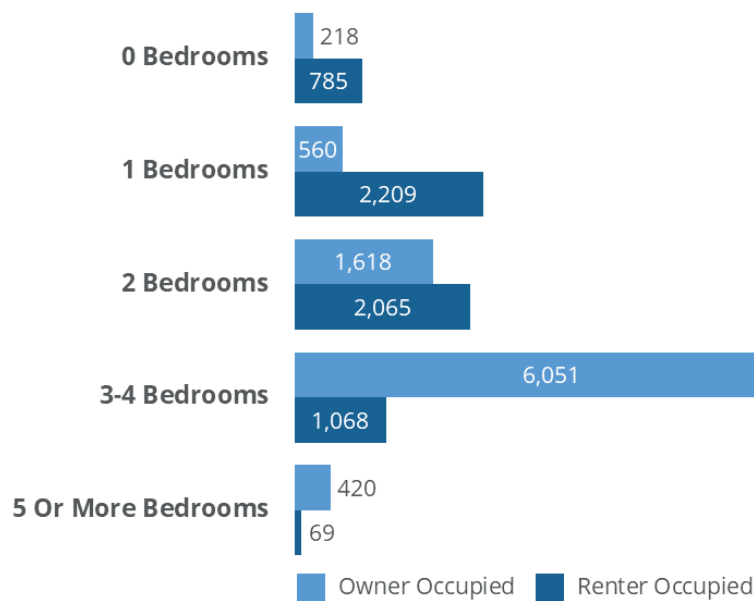
Source: ABAG Housing Needs Data Workbook

Figure II-19.
Housing Type by Tenure, City of San Bruno, 2019



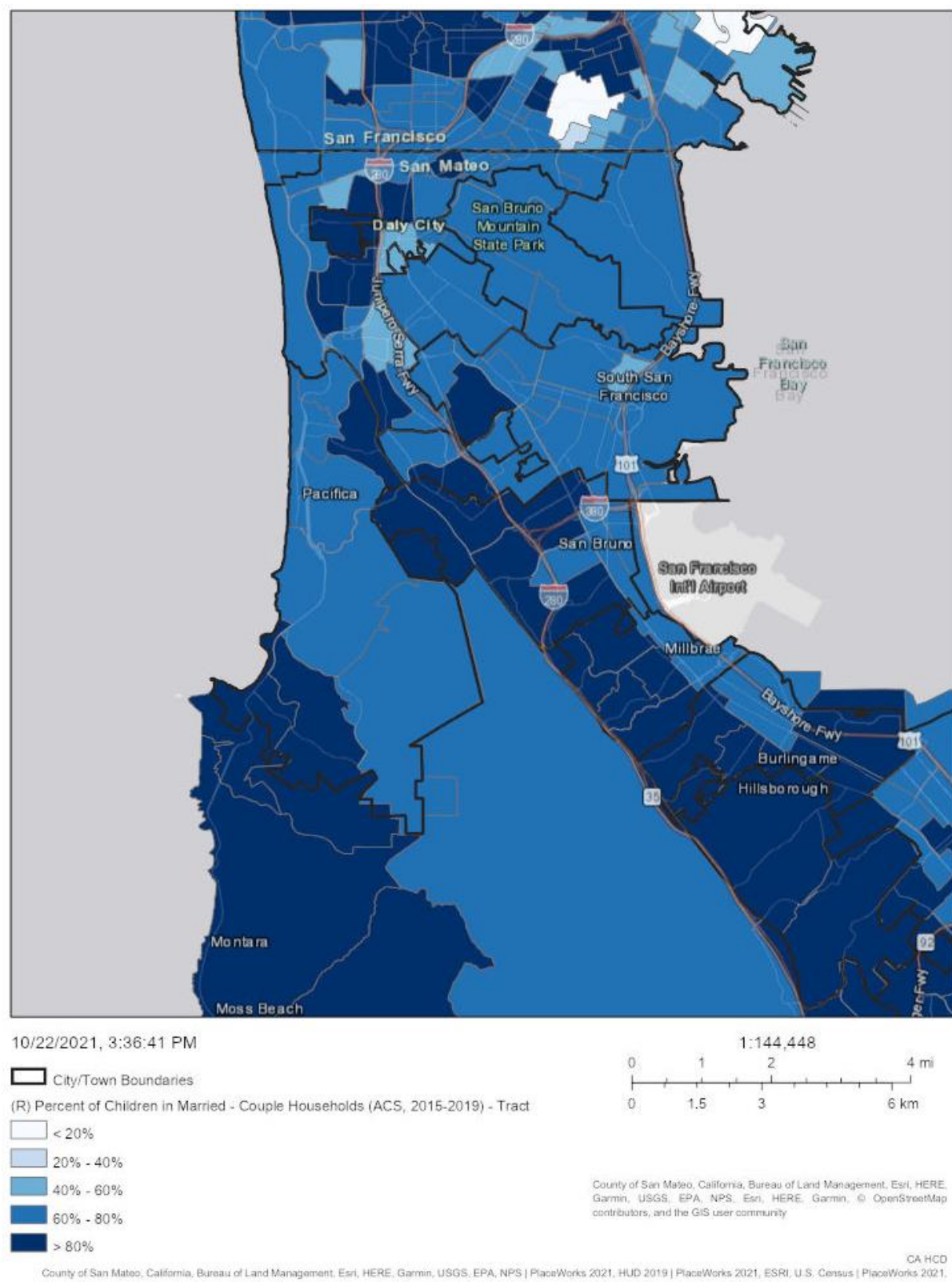
Source: ABAG Housing Needs Data Workbook

Figure II-20.
Housing Units by Number of Bedrooms and Tenure, City of San Bruno, 2019



Source: ABAG Housing Needs Data Workbook

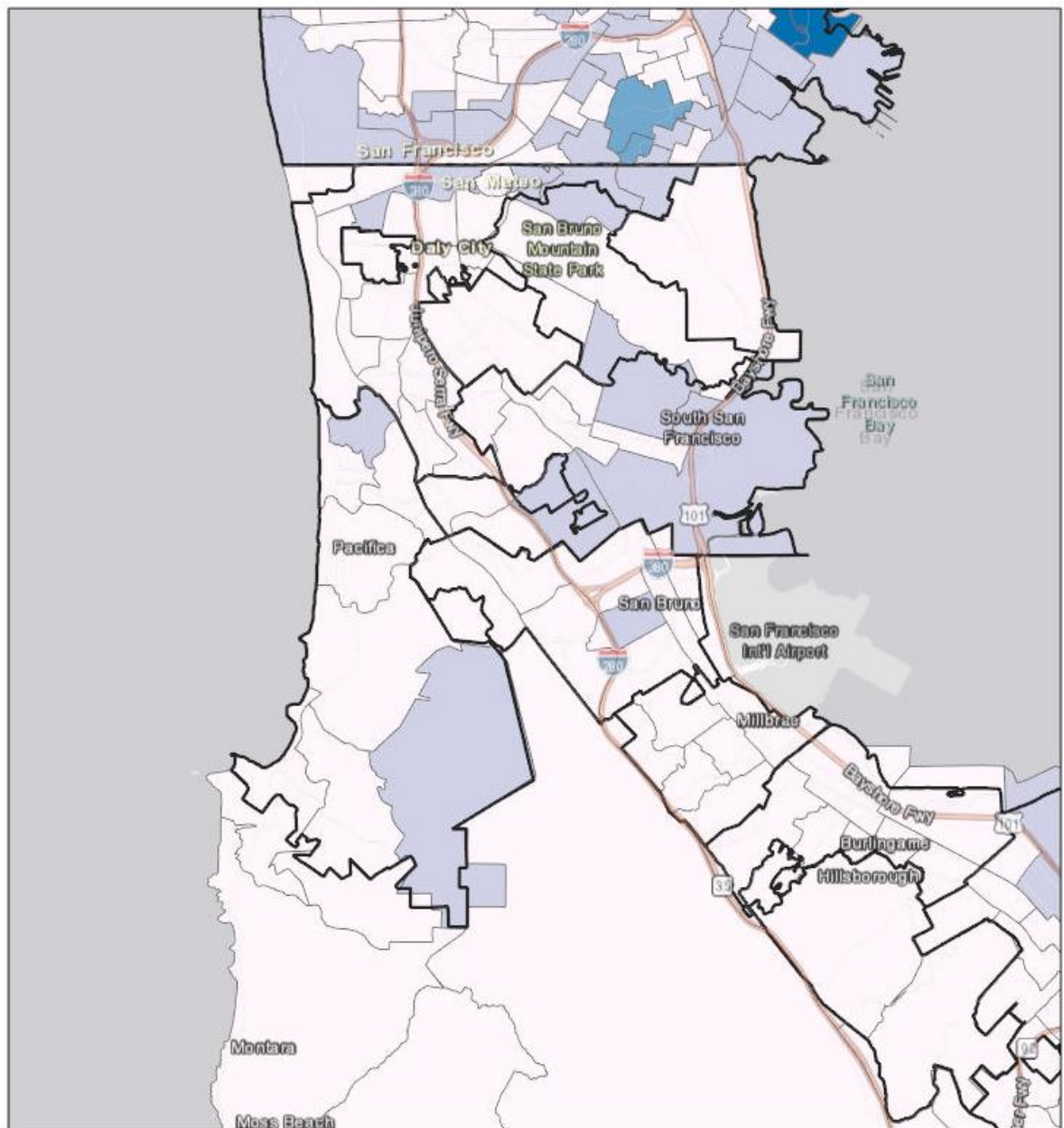
Figure II-21.
% of Children in Married Couple Households by Census Tract, 2019



Source: California Department of Housing and Community Development AFFH Data Viewer

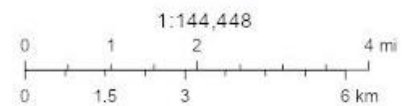
Figure II-22. [legend missing in HCD provided map]

% Households with Single Female with Children by Census Tract, 2019



10/22/2021, 3:26:16 PM

City/Town Boundaries



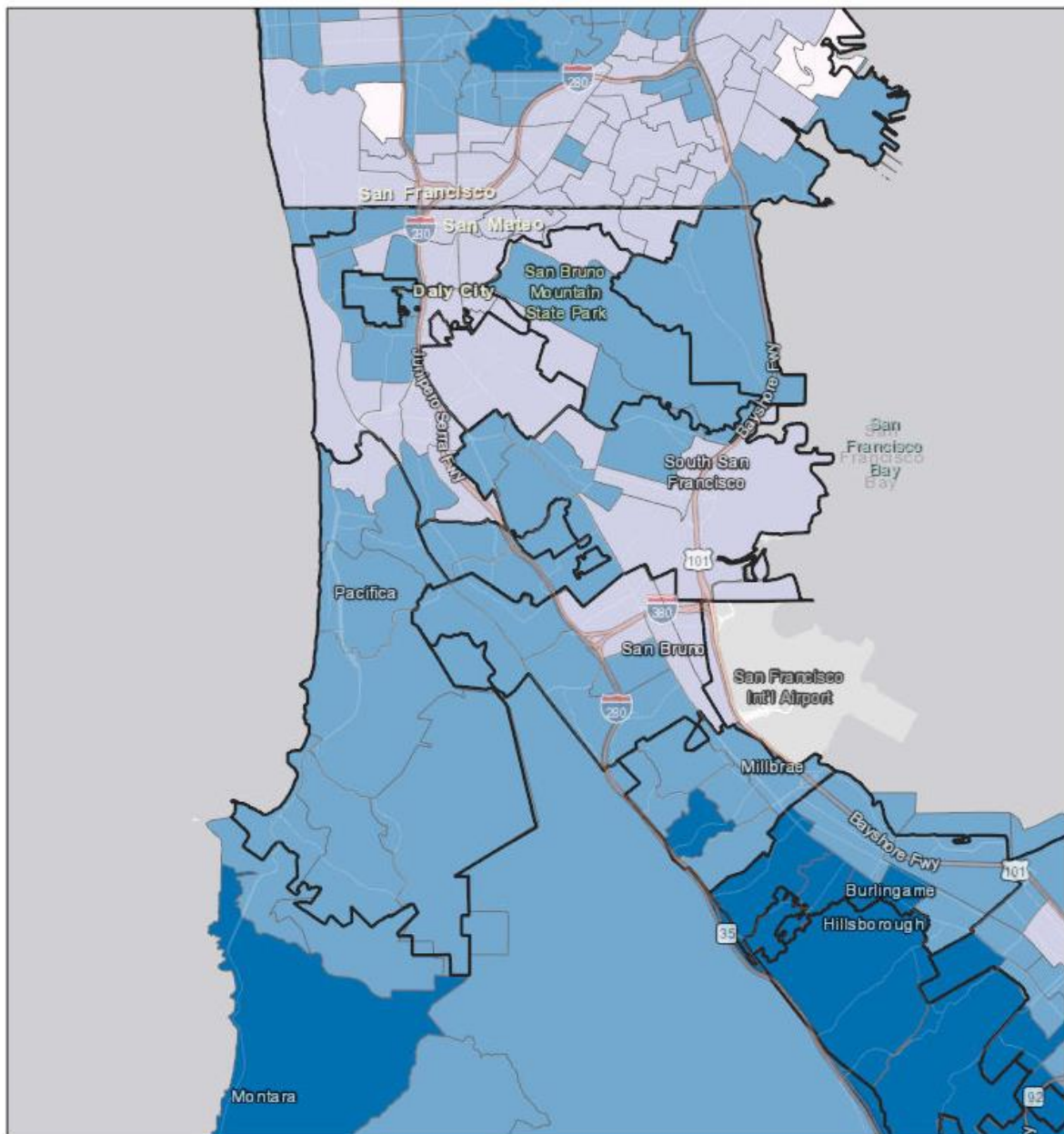
County of San Mateo, California, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS, Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community

CA HCD
County of San Mateo, California, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021.

Source: California Department of Housing and Community Development AFFH Data Viewer

Figure II-23. [legend missing in HCD provided map]

% of Married Couple Households by Census Tract, 2019



10/22/2021, 3:52:58 PM

City/Town Boundaries

1:144,448
0 1 2 4 mi
0 1.5 3 6 km

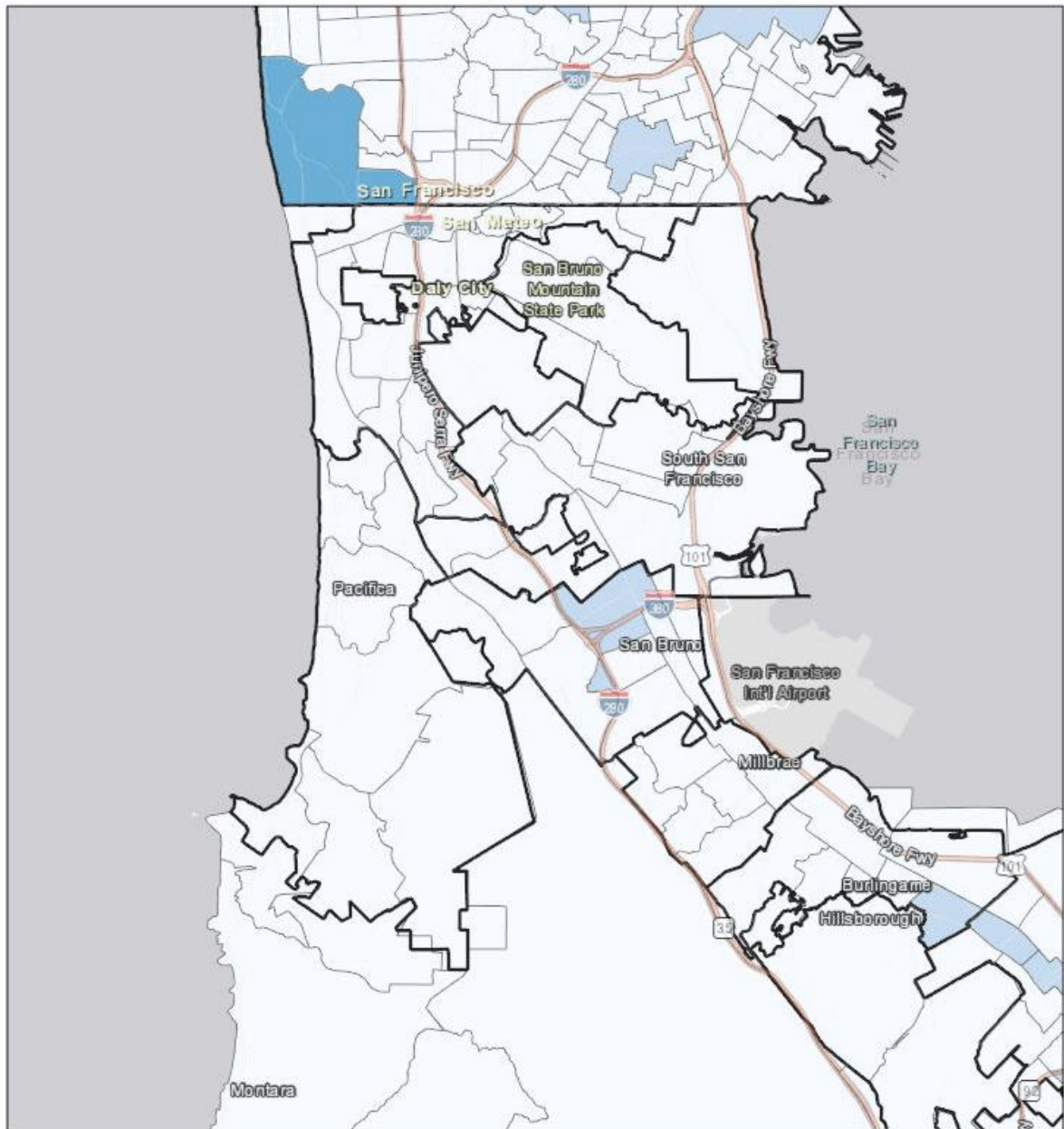
County of San Mateo, California, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS, Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community

CA HCD
County of San Mateo, California, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021.

Source: California Department of Housing and Community Development AFFH Data Viewer

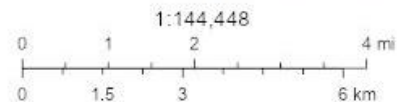
Figure II-24. [legend missing in HCD provided map]

% of Adults Living Alone by Census Tract, 2019



10/22/2021, 3:28:42 PM

City/Town Boundaries



County of San Mateo, California, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS, Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community

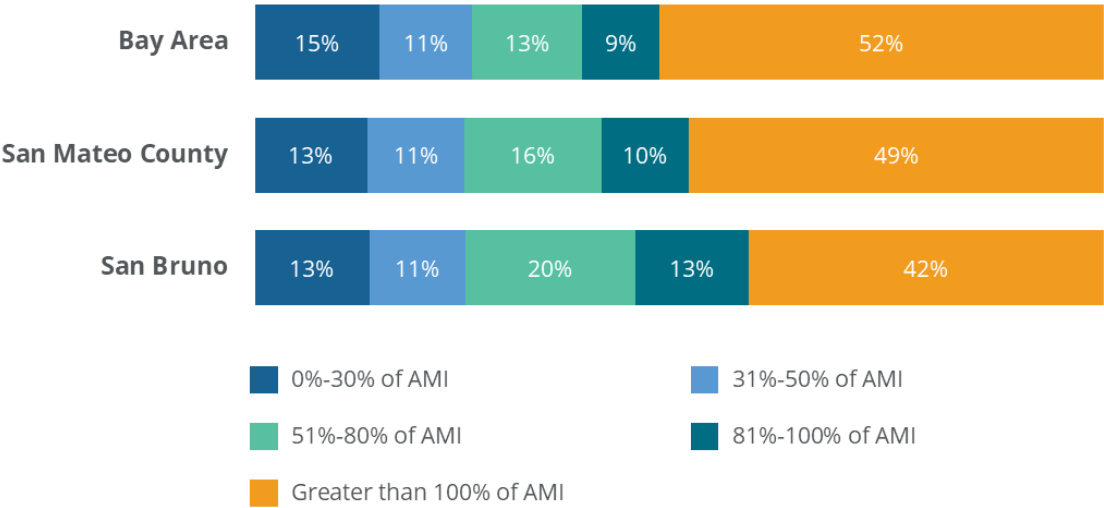
CA HCD
County of San Mateo, California, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021.

Source: California Department of Housing and Community Development AFFH Data Viewer

Household income.

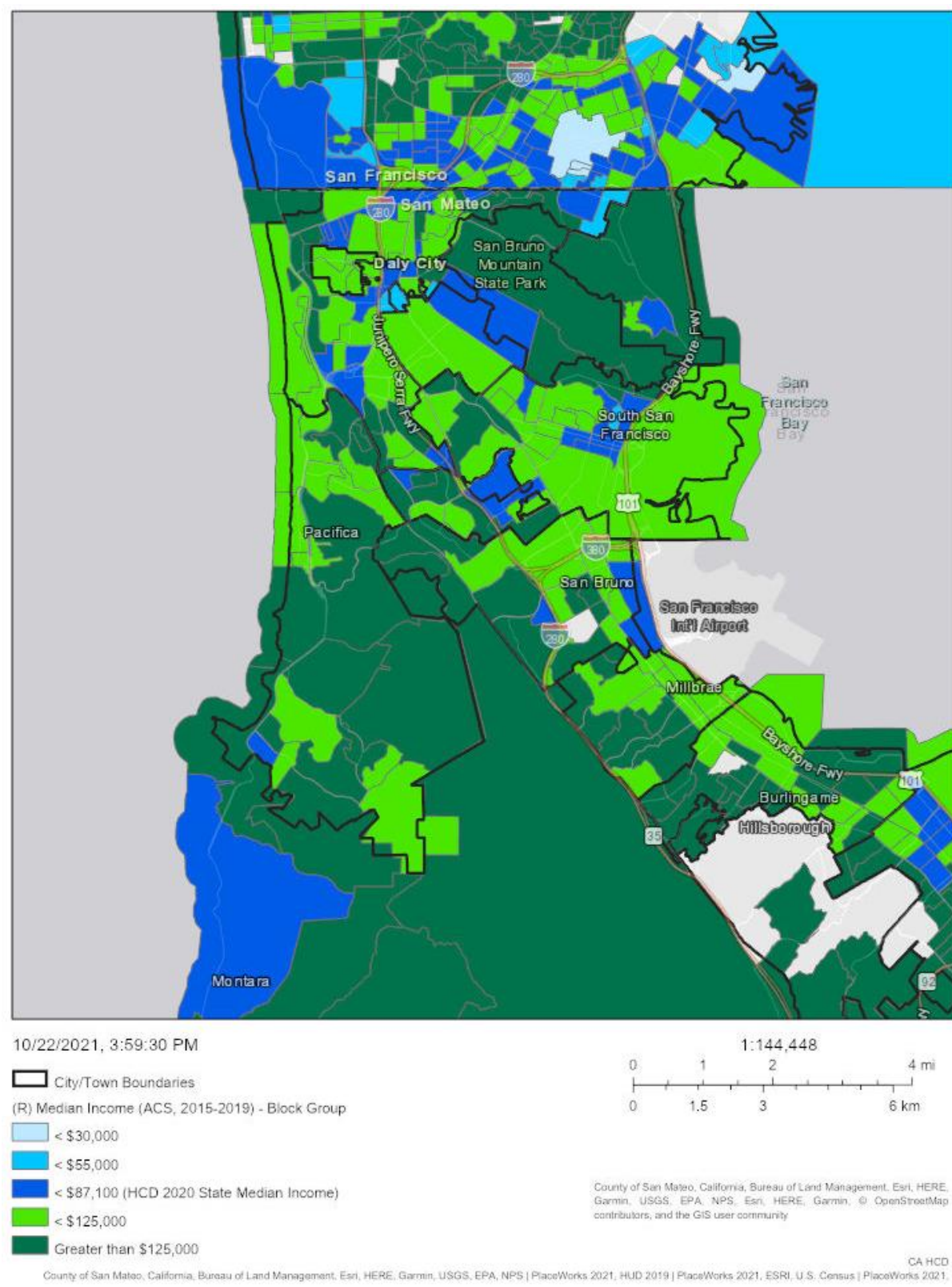
Figure II-25.

Share of Households by Area Median Income (AMI), 2019



Source: ABAG Housing Needs Data Workbook

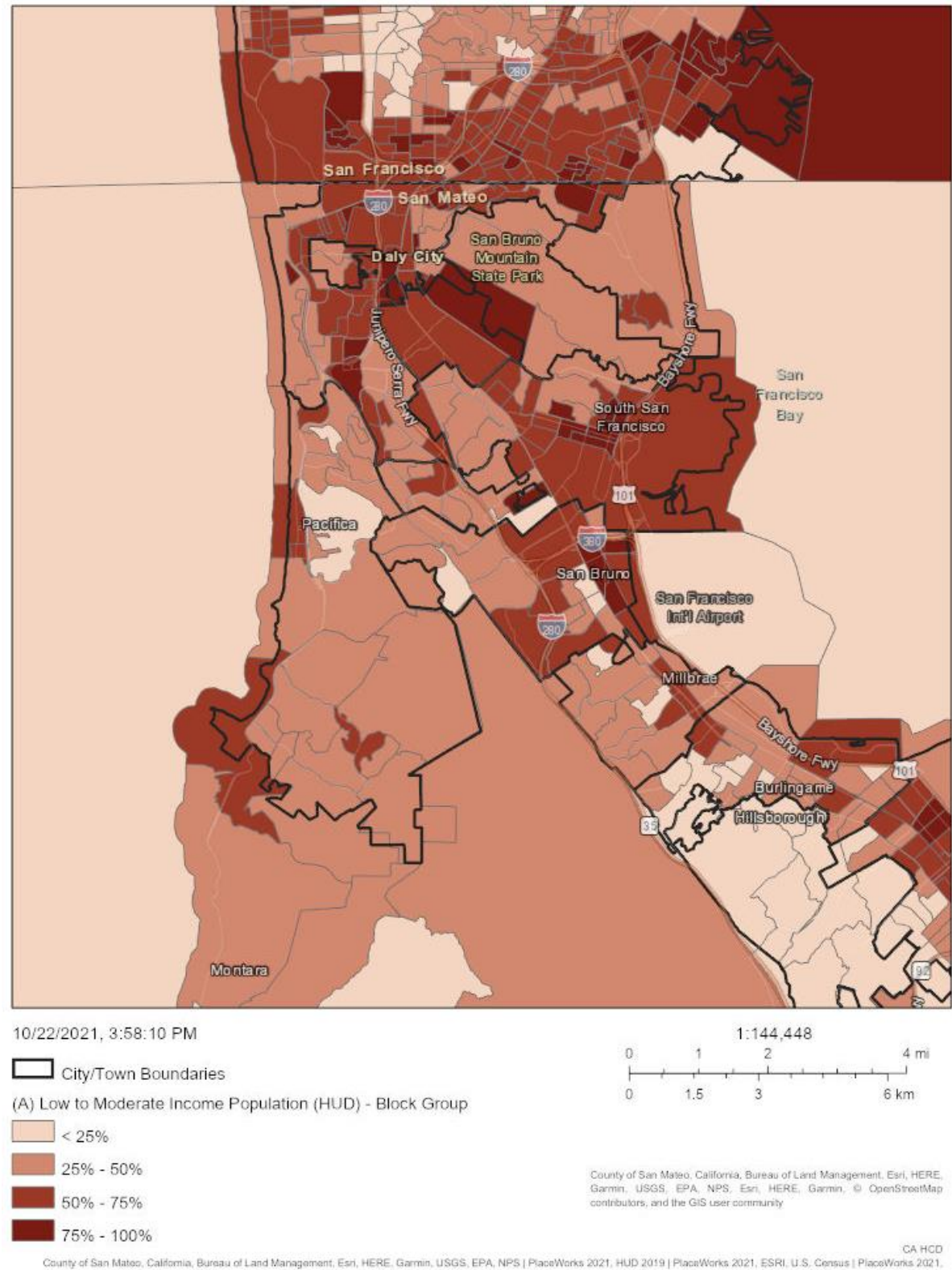
Figure II-26.
Median Household Income by Block Group, 2019



Source: California Department of Housing and Community Development AFFH Data Viewer

Figure II-27.

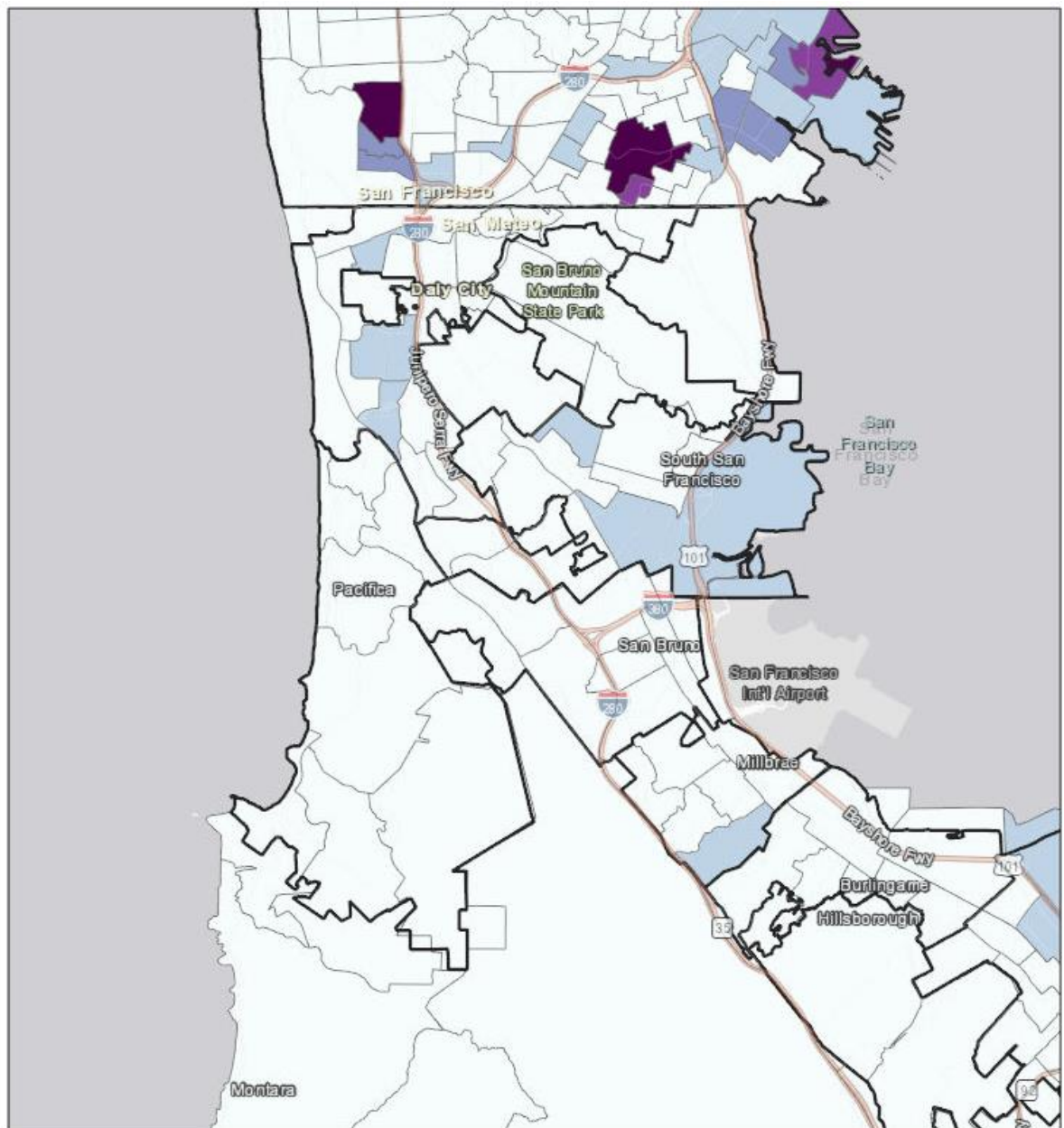
Low to Moderate Income Population by Block Group



Source: California Department of Housing and Community Development AFFH Data Viewer

Figure II-28.

Poverty Status by Census Tract, 2019



10/22/2021, 4:06:54 PM

City/Town Boundaries

(R) Poverty Status (ACS, 2015 - 2019) - Tract

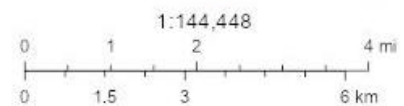
< 10%

10% - 20%

20% - 30%

30% - 40%

> 40%



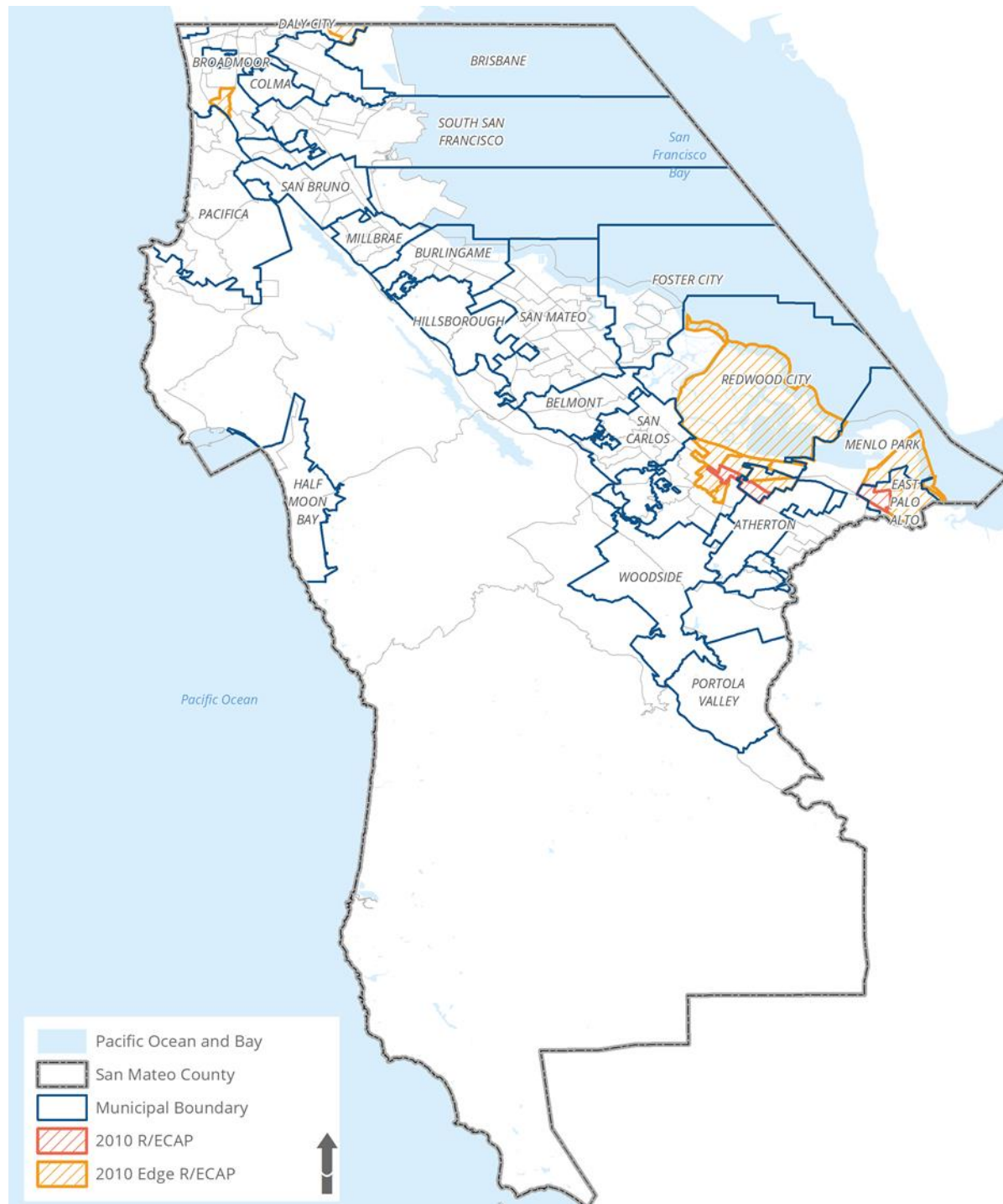
County of San Mateo, California, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS, Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community

CA HCD
County of San Mateo, California, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021,

Source: California Department of Housing and Community Development AFFH Data Viewer

Figure II-29.

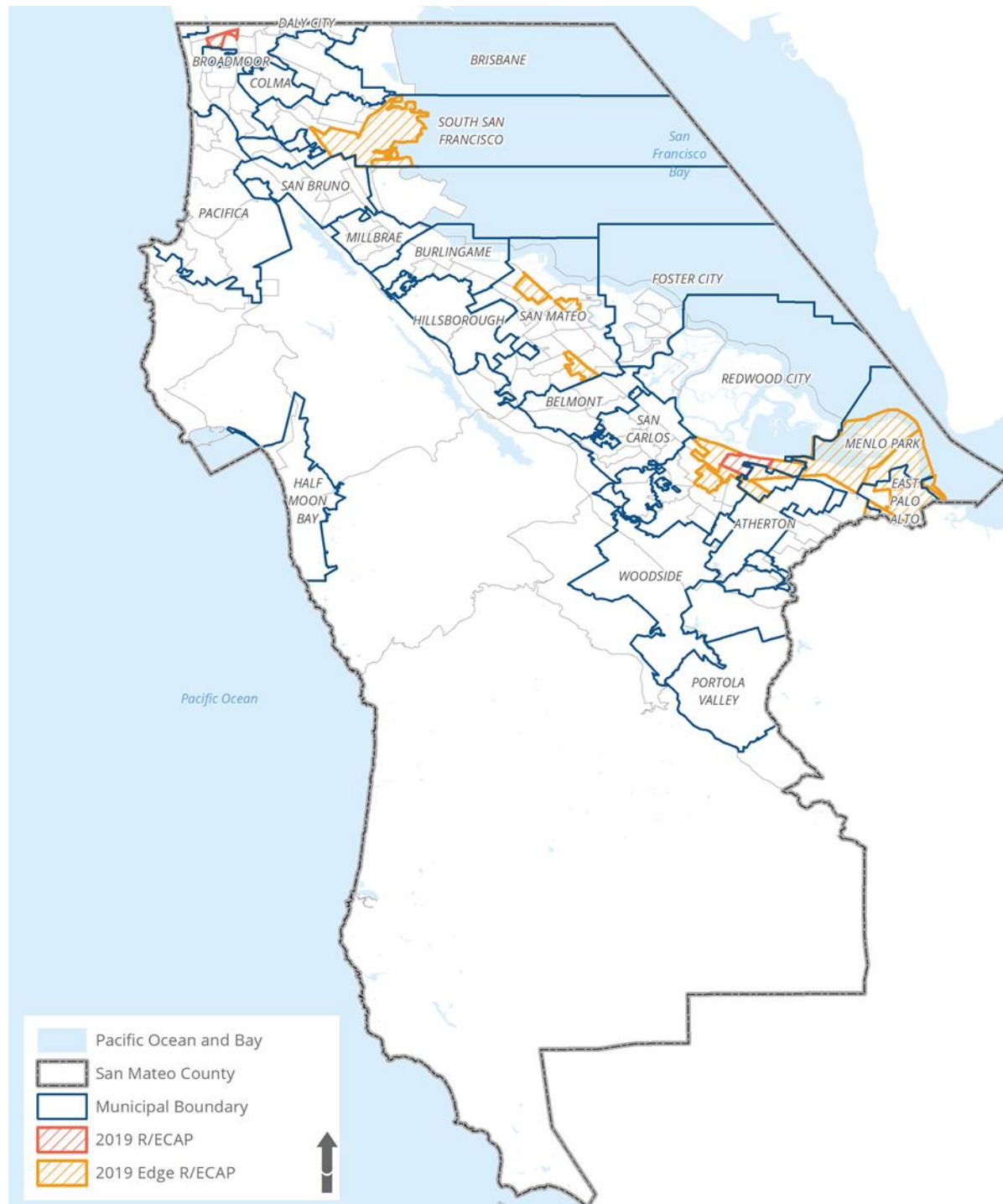
R/ECAPs and Edge R/ECAPs, 2010



Note: R/ECAPs are census tracts that have a non-white population of 50 percent or more (majority-minority) AND the poverty rate is three times the average tract poverty rate for the County (19.4% in 2010). Edge R/ECAPs are census tracts that have a non-white population of 50 percent or more (majority-minority) AND the poverty rate is two times the average tract poverty rate for the County (13% in 2010).

Source: California Department of Housing and Community Development AFFH Data Viewer

Figure II-30.
R/ECAPs and Edge R/ECAPs, 2019



Note: R/ECAPs are census tracts that have a non-white population of 50 percent or more (majority-minority) AND the poverty rate is three times the average tract poverty rate for the County (19.1% in 2010). Edge R/ECAPs are census tracts that have a non-white population of 50 percent or more (majority-minority) AND the poverty rate is two times the average tract poverty rate for the County (12.8% in 2019).

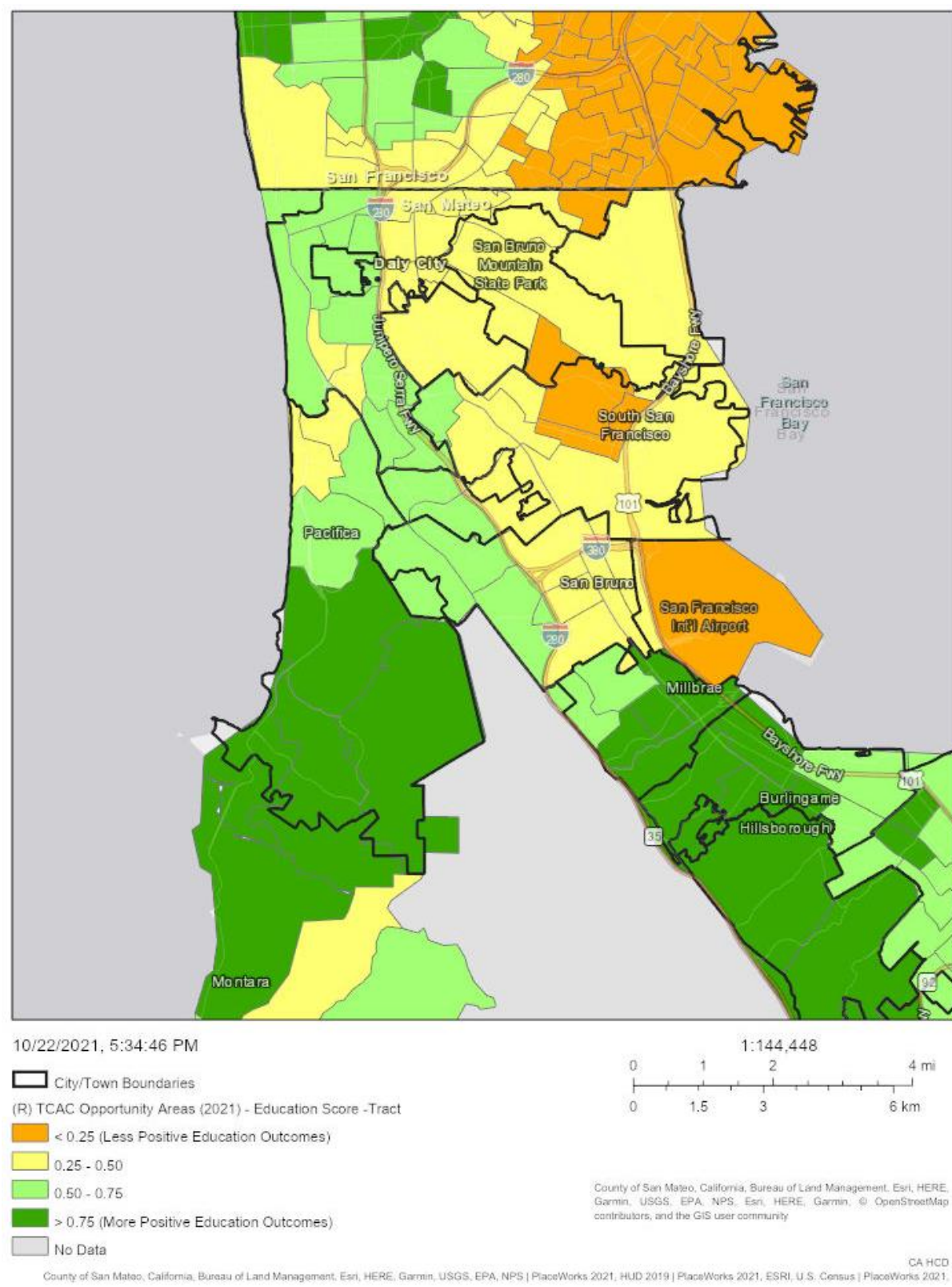
Source: California Department of Housing and Community Development AFFH Data Viewer

SECTION III. Access to Opportunity

Education

[Available December 2021] Appendix item: Access to education supplement—findings from a countywide analysis of access to education and educational outcomes by protected class.

Figure III-1.
TCAC Opportunity Areas Education Score by Census Tract, 2021

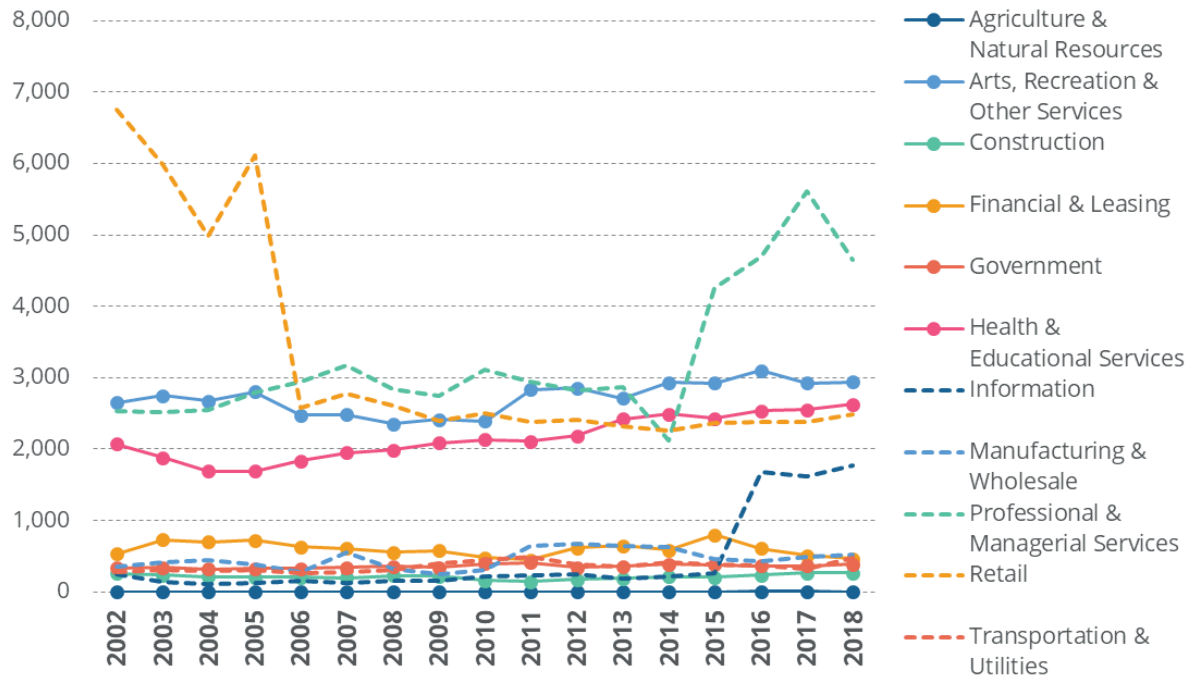


Source: California Department of Housing and Community Development AFFH Data Viewer

Employment

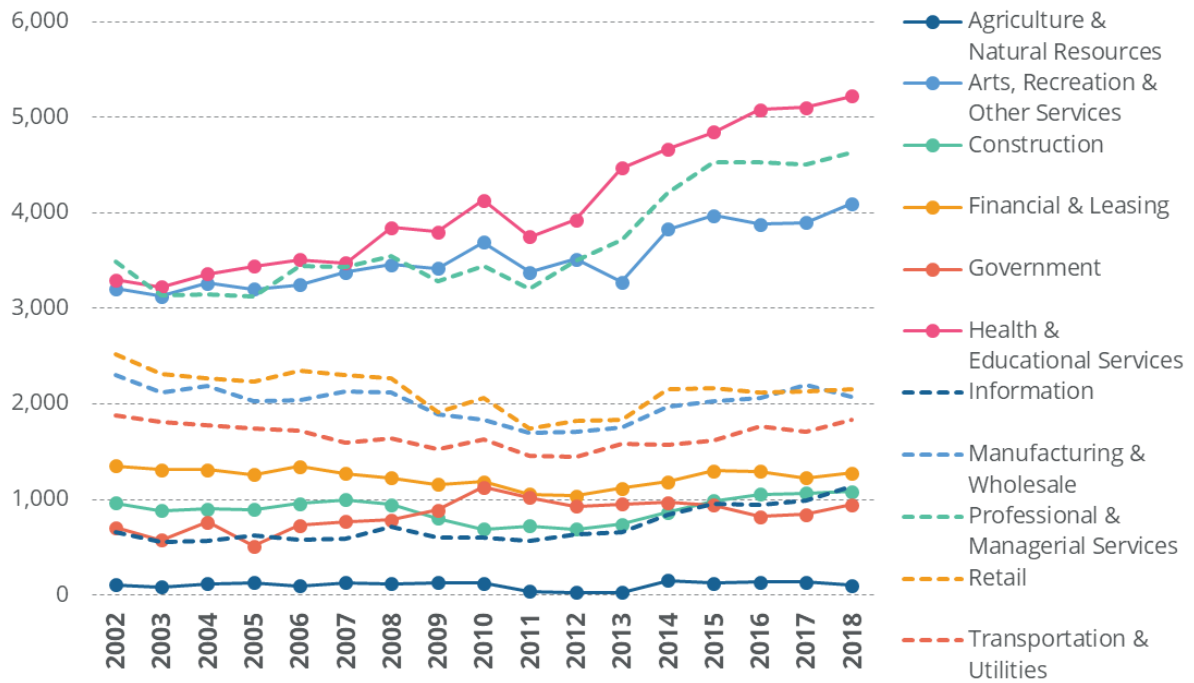
Figure III-2.

Jobs by Industry, City of San Bruno, 2002-2018



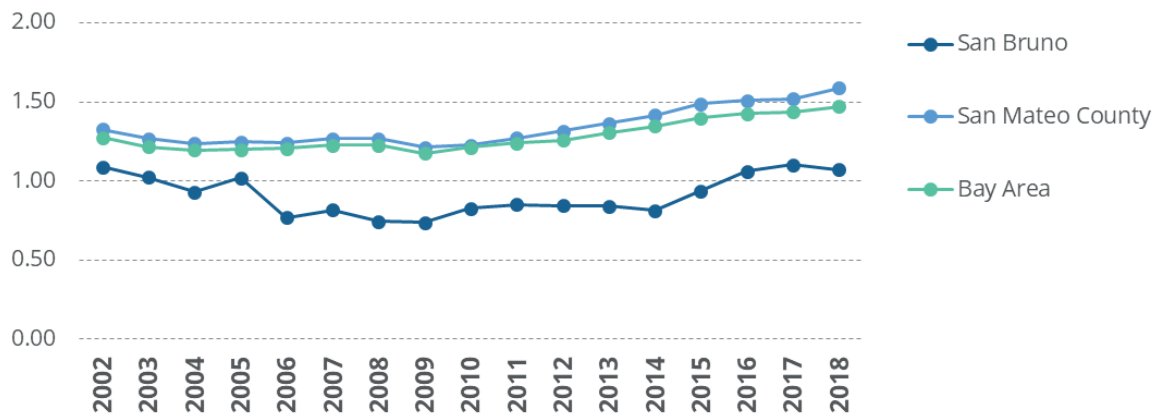
Source: ABAG Housing Needs Data Workbook

Figure III-3.
Job Holders by Industry, City of San Bruno, 2002-2018



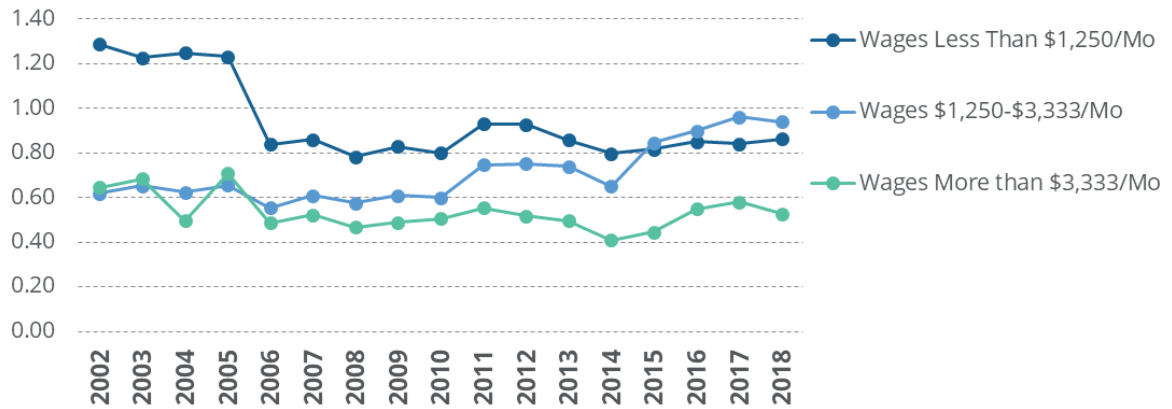
Source: ABAG Housing Needs Data Workbook

Figure III-4.
Jobs to Household Ratio, City of San Bruno, 2002-2018



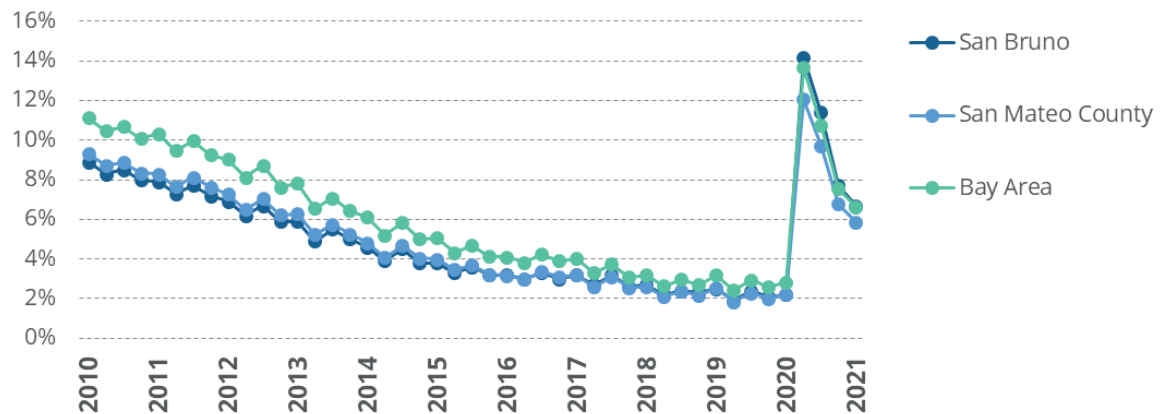
Source: ABAG Housing Needs Data Workbook

Figure III-5.
Jobs to Worker Ratio by Wage, City of San Bruno, 2002-2018



Source: ABAG Housing Needs Data Workbook

Figure III-6.
Unemployment Rate, 2010-2021



Source: ABAG Housing Needs Data Workbook

Figure III-7.
TCAC Opportunity Areas Economic Score by Census Tract, 2021

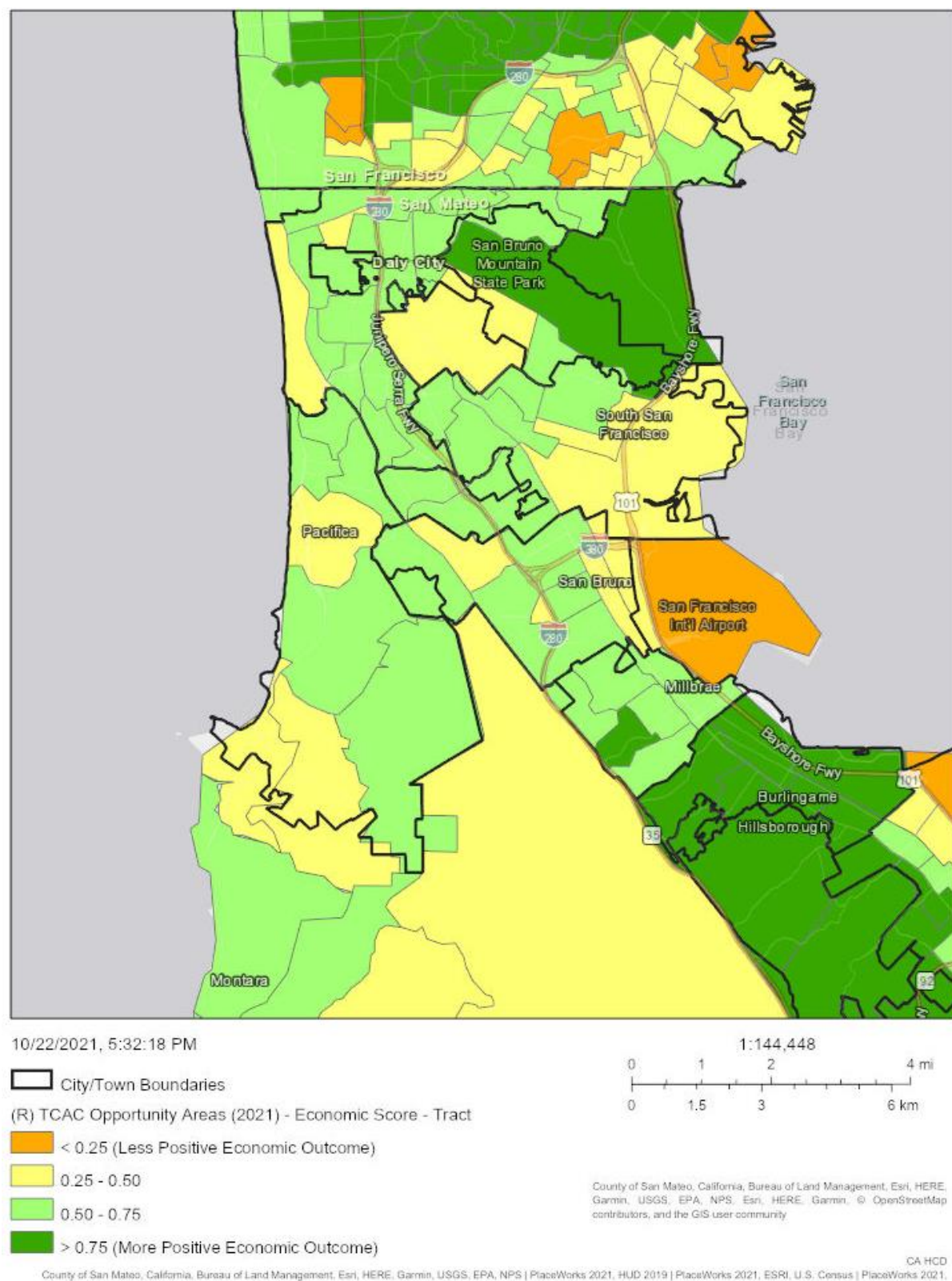
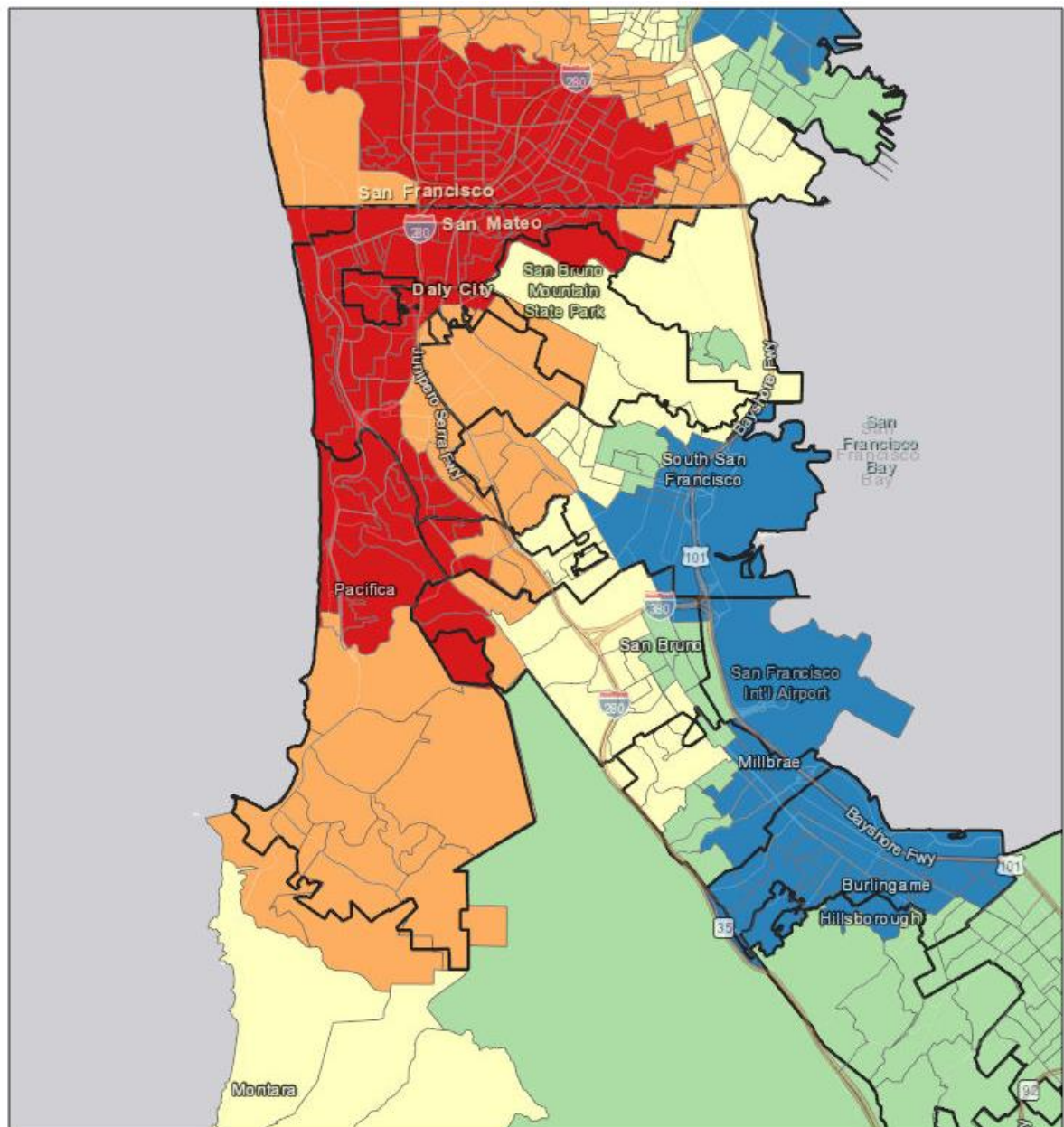
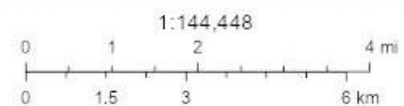


Figure III-8.
Jobs Proximity Index by Block Group, 2017



10/22/2021, 5:40:06 PM

- City/Town Boundaries
- (A) Jobs Proximity Index (HUD, 2014 - 2017) - Block Group
- < 20 (Furthest Proximity)
- 20 - 40
- 40 - 60
- 60 - 80
- > 80 (Closest Proximity)



County of San Mateo, California, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS, Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community

CA HCD
County of San Mateo, California, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021.

Source: California Department of Housing and Community Development AFFH Data Viewer

Transportation

[TCAC's transportation opportunity score and maps were not available at the time of this report]

Environment

Figure III-9.
TCAC Opportunity Areas Environmental Score by Census Tract, 2021

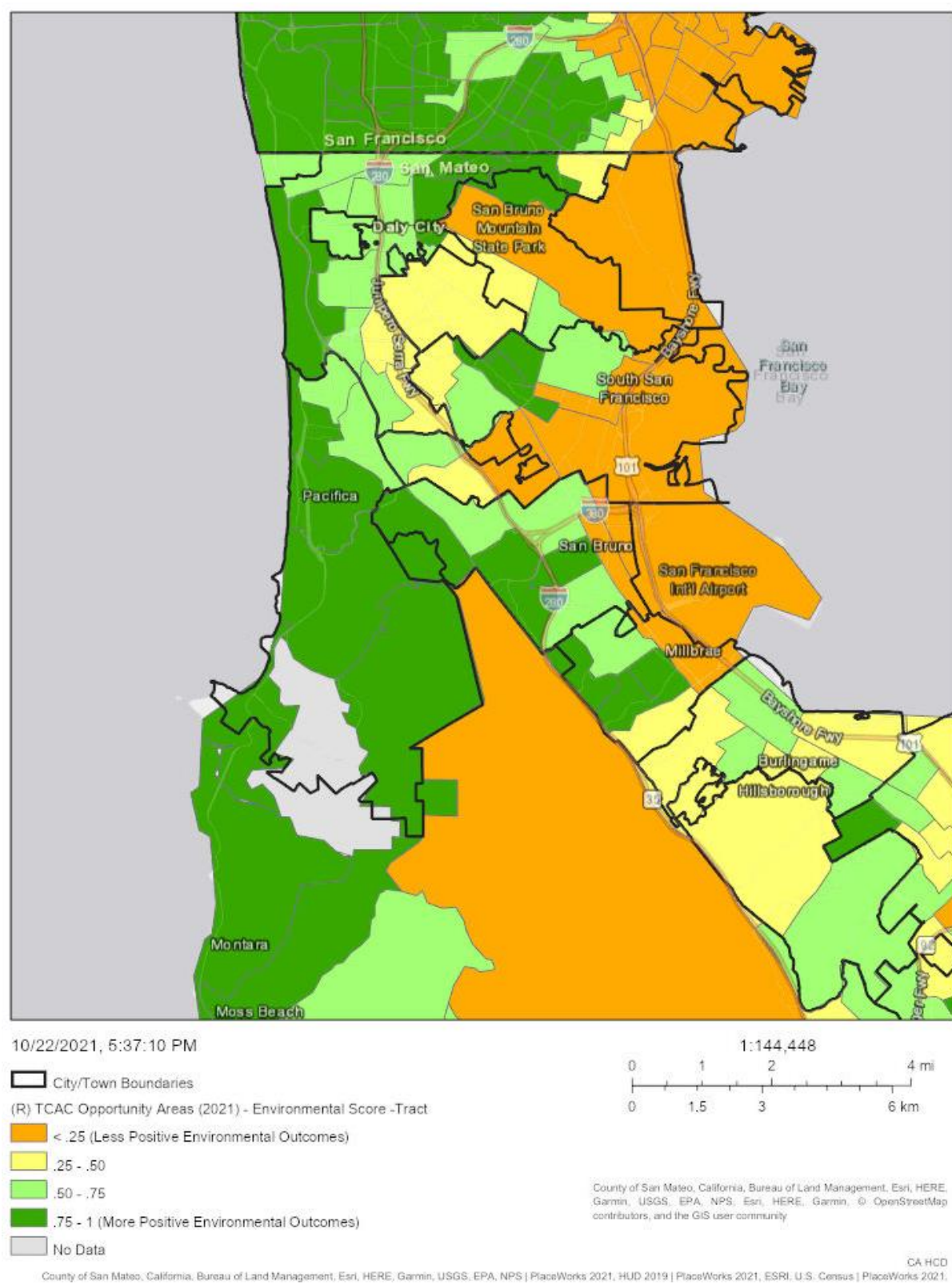
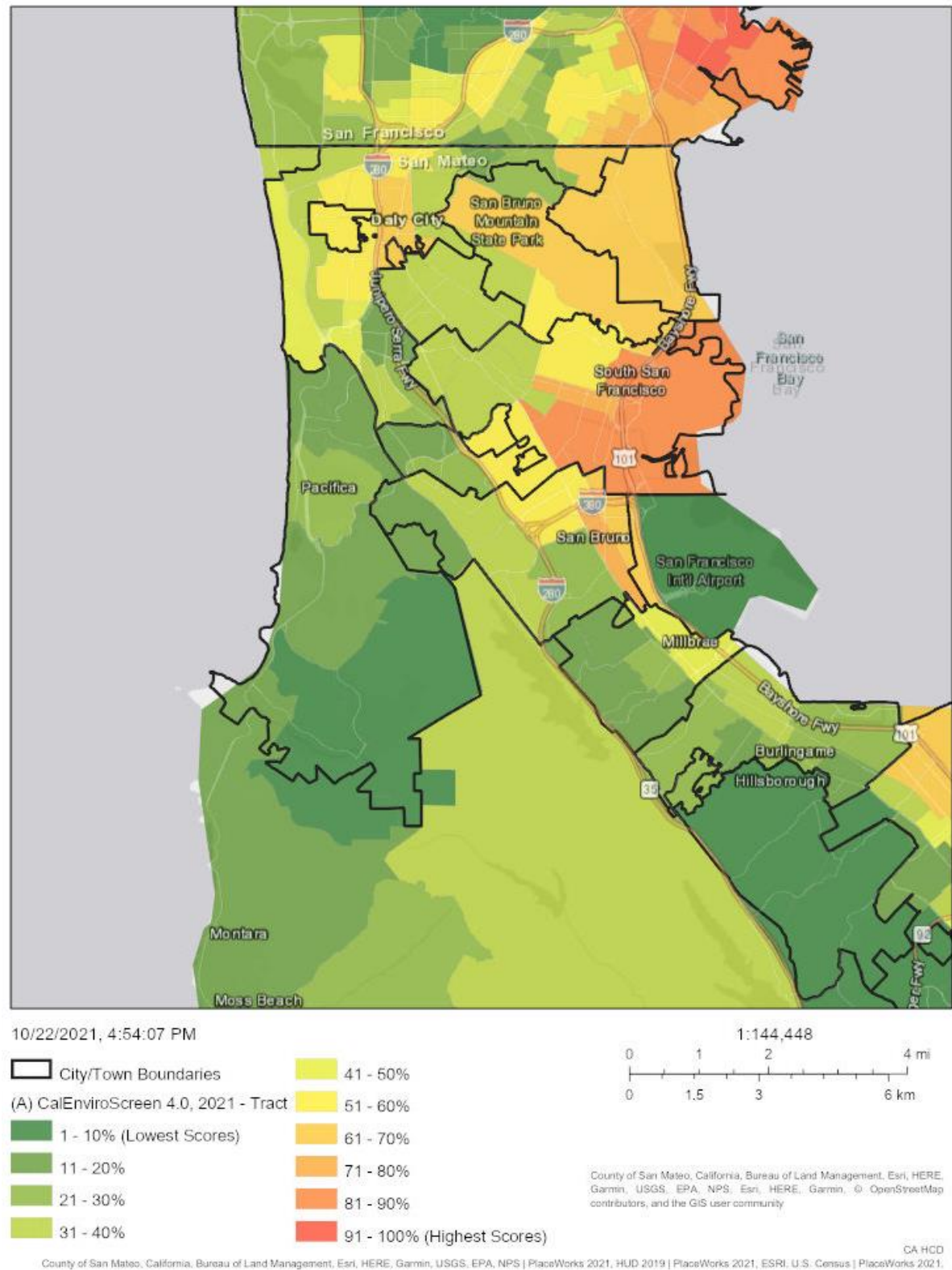
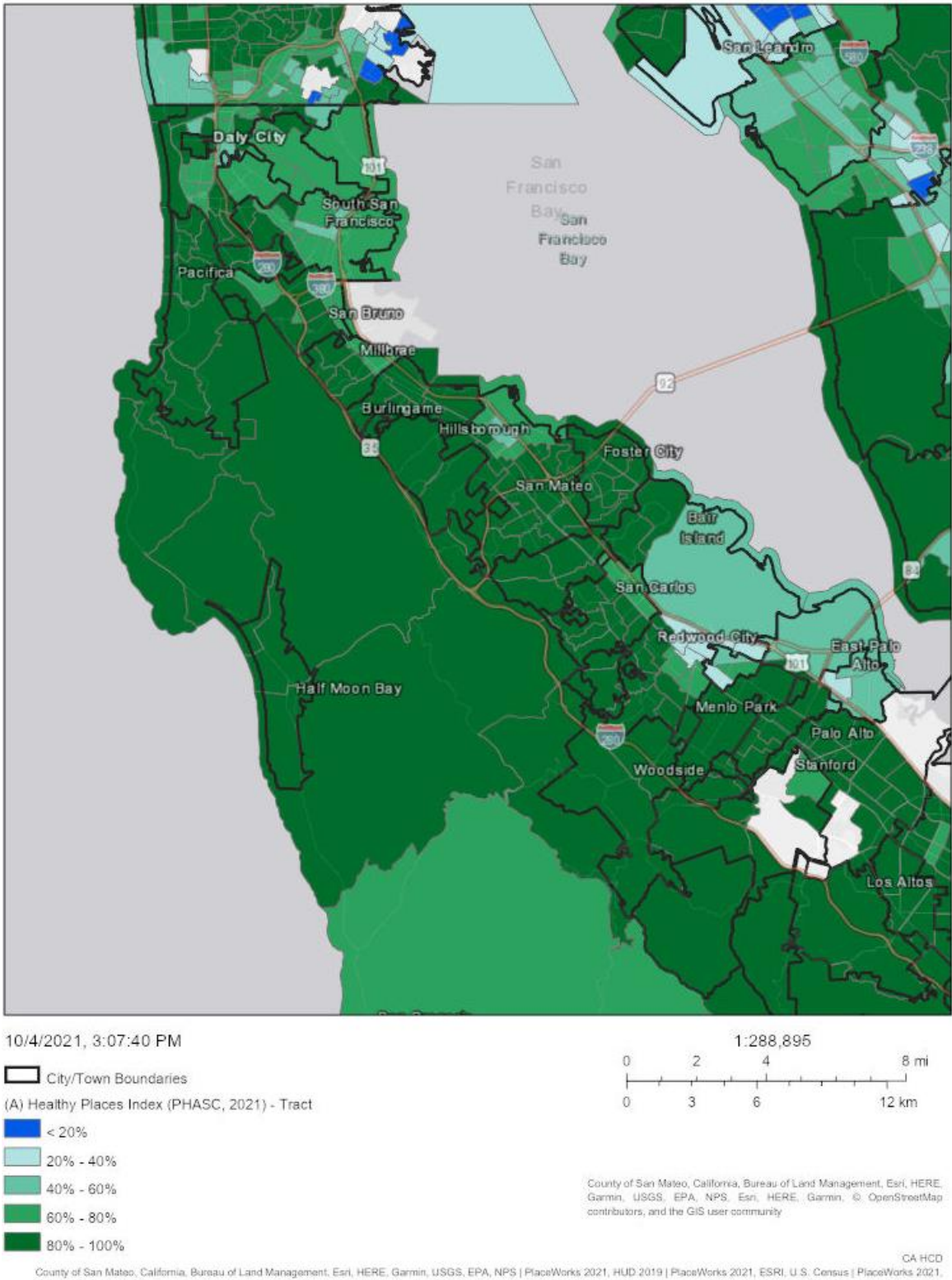


Figure III-10.
CalEnviroScreen by Census Tract, 2021



Source: California Department of Housing and Community Development AFFH Data Viewer

Figure III-11.
Healthy Places Index by Census Tract, 2021

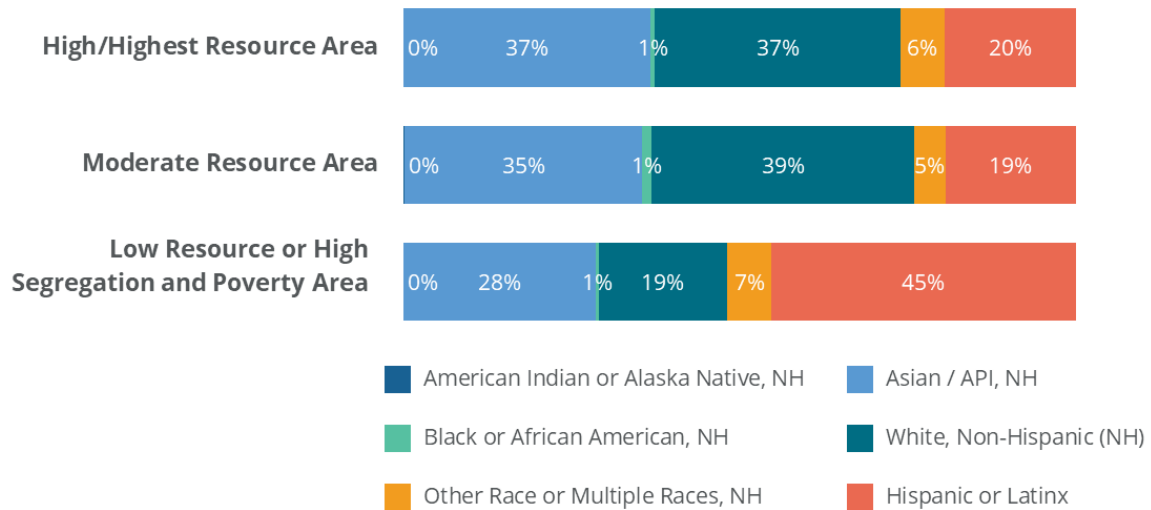


Source: California Department of Housing and Community Development AFFH Data Viewer

Patterns in disparities in access to opportunity.

Figure III-12.

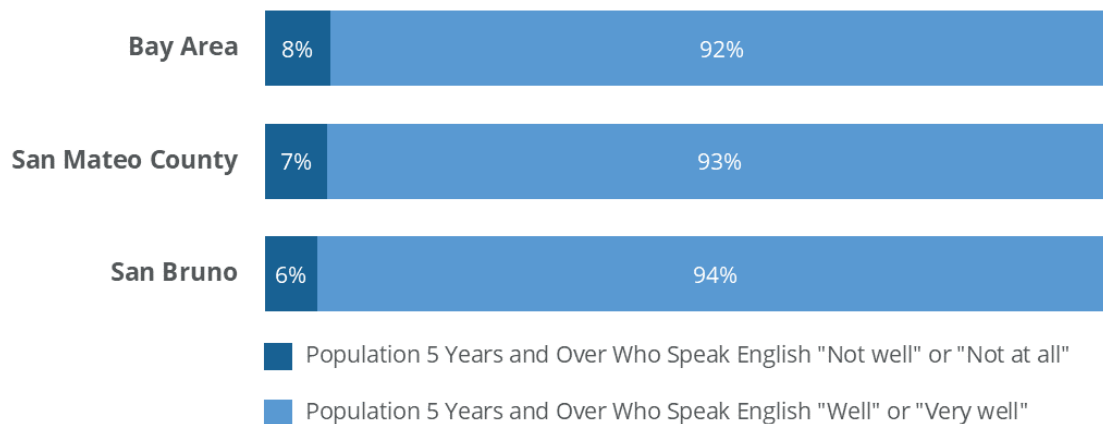
Population Living in Moderate and High Resource Areas by Race and Ethnicity, City of San Bruno, 2019



Source: ABAG Housing Needs Data Workbook

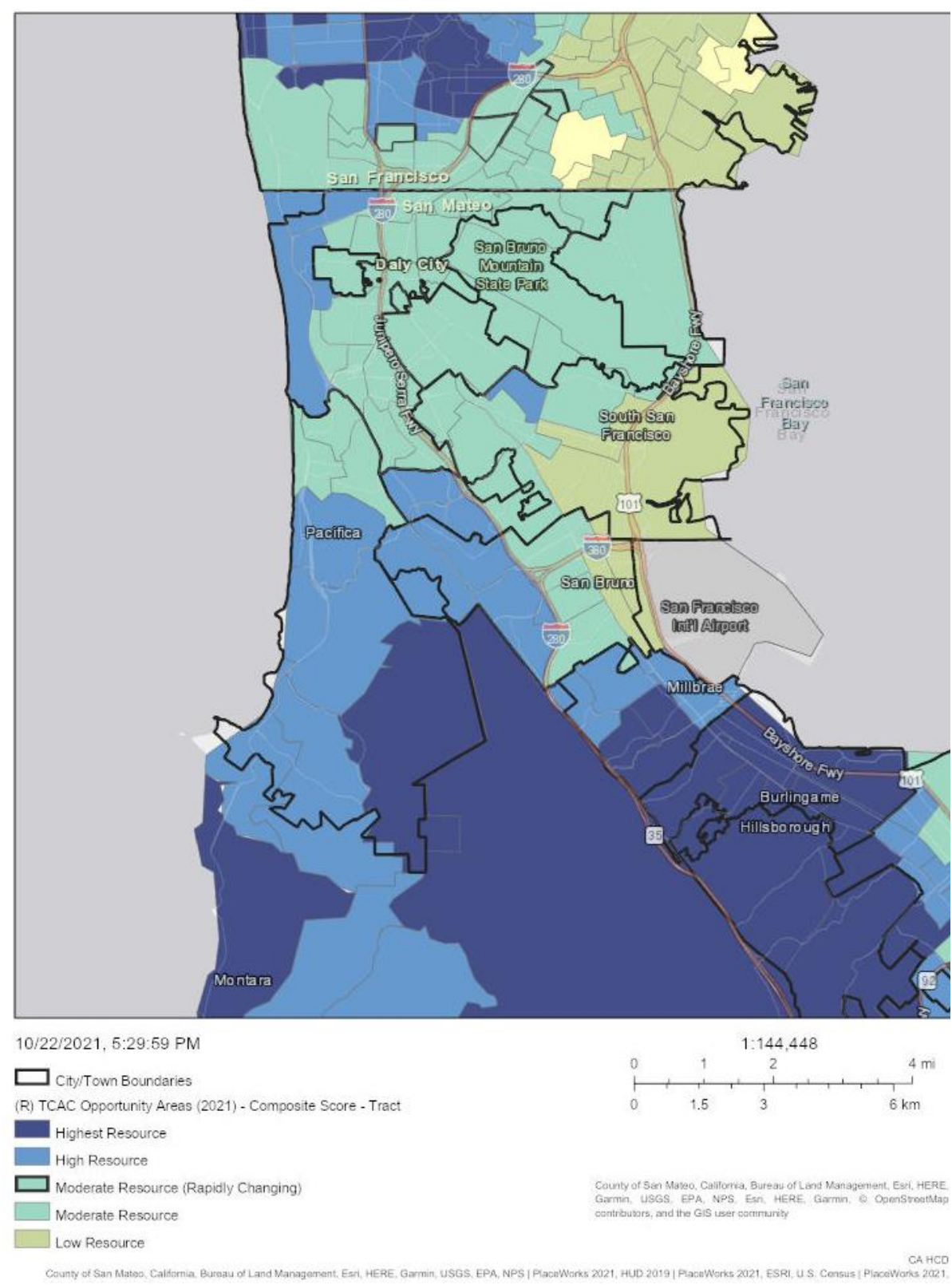
Figure III-13.

Population with Limited English Proficiency, City of San Bruno, 2019



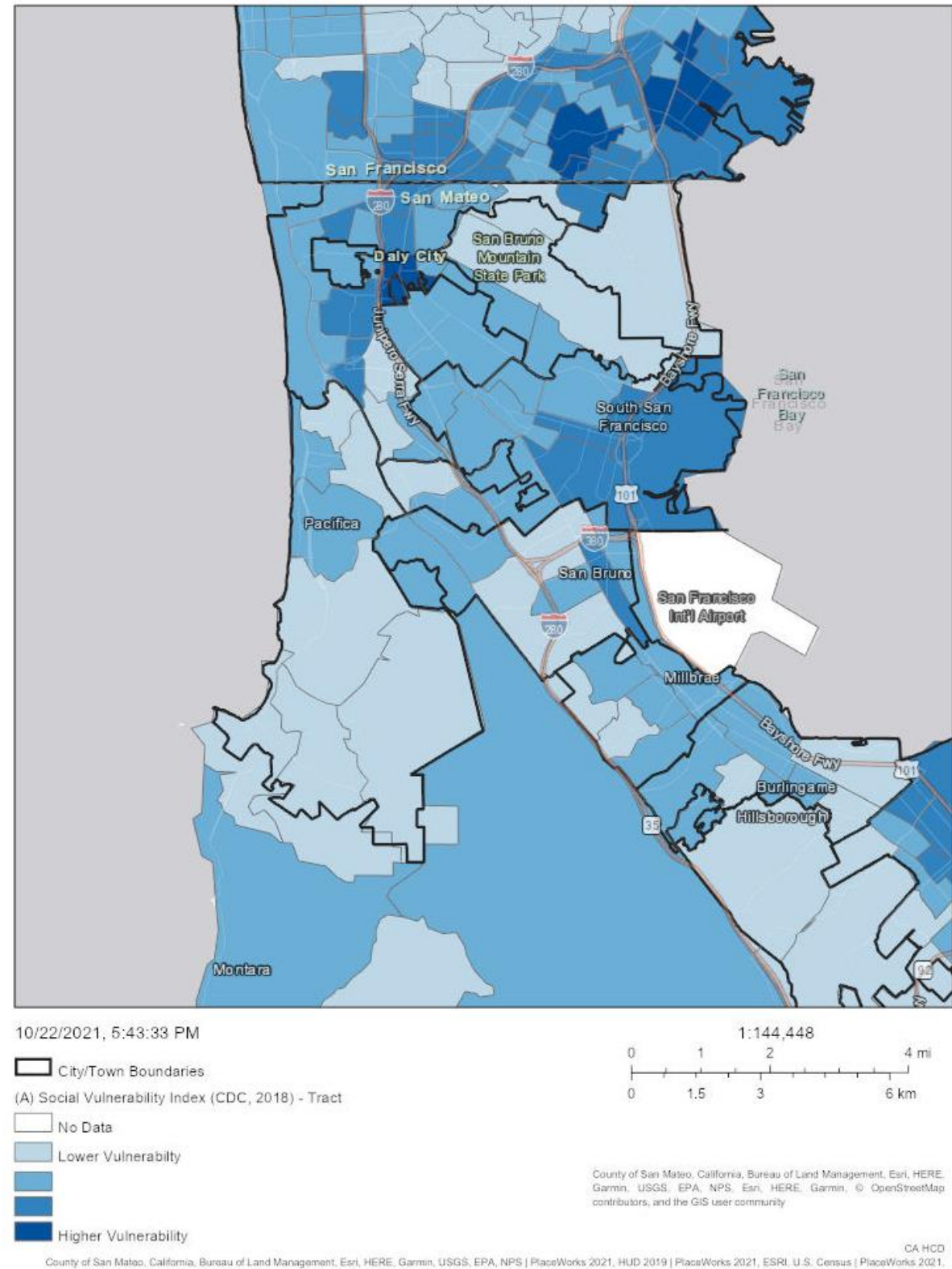
Source: ABAG Housing Needs Data Workbook

Figure III-14.
TCAC Opportunity Areas Composite Score by Census Tract, 2021



Source: California Department of Housing and Community Development AFFH Data Viewer

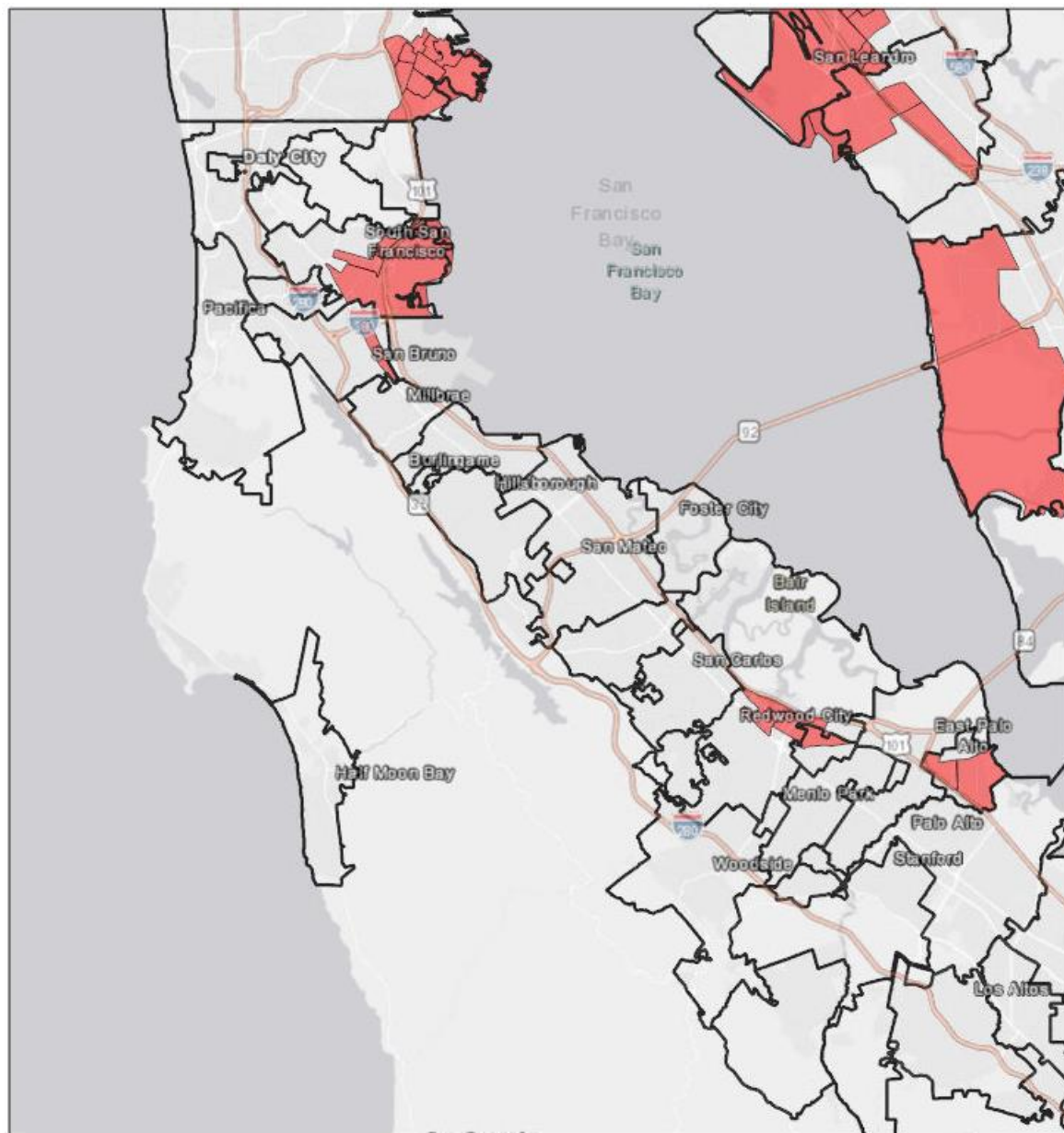
Figure III-15.
Social Vulnerability Index by Census Tract, 2018





Source: California Department of Housing and Community Development AFFH Data Viewer

Figure III-16.

SB 535 Disadvantaged Communities



10/4/2021, 3:07:03 PM

-  City/Town Boundaries
-  (A) SB 535 Disadvantaged Communities

1:288,895

0 2 4 8 mi

0 3 6 12 km

County of San Mateo, California, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS, Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community

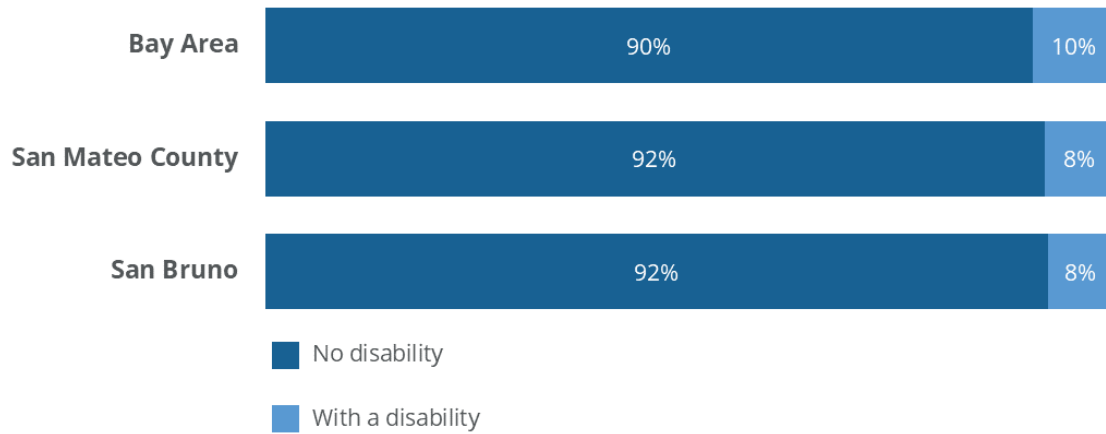
CA HCD
County of San Mateo, California, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021,

Source: California Department of Housing and Community Development AFFH Data Viewer

Disparities in access to opportunity for persons with disabilities.

Figure III-17.

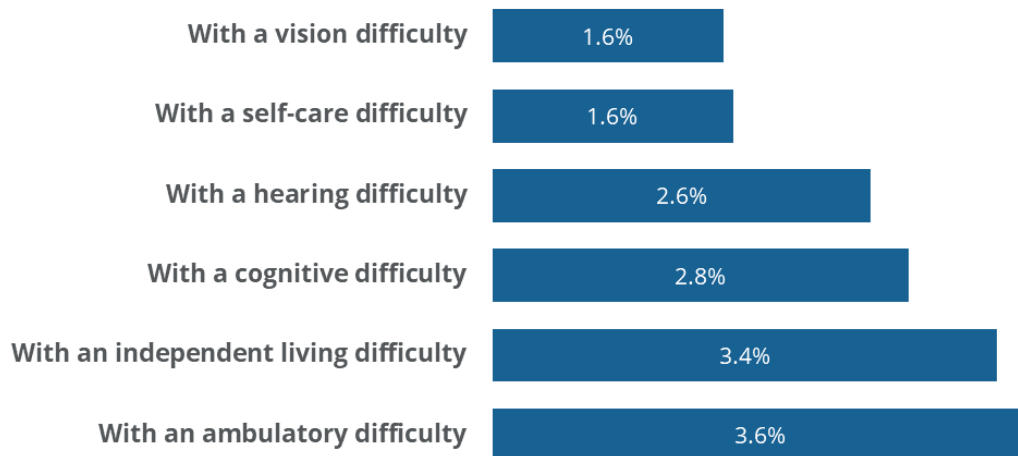
Population by Disability Status, City of San Bruno, 2019



Source: ABAG Housing Needs Data Workbook

Figure III-18.

Disability by Type for the Non-Institutionalized Population 18 Years and Over, City of San Bruno, 2019



Source: ABAG Housing Needs Data Workbook

Figure III-19.
Disability by Type for Seniors (65 years and over), City of San Bruno, 2019

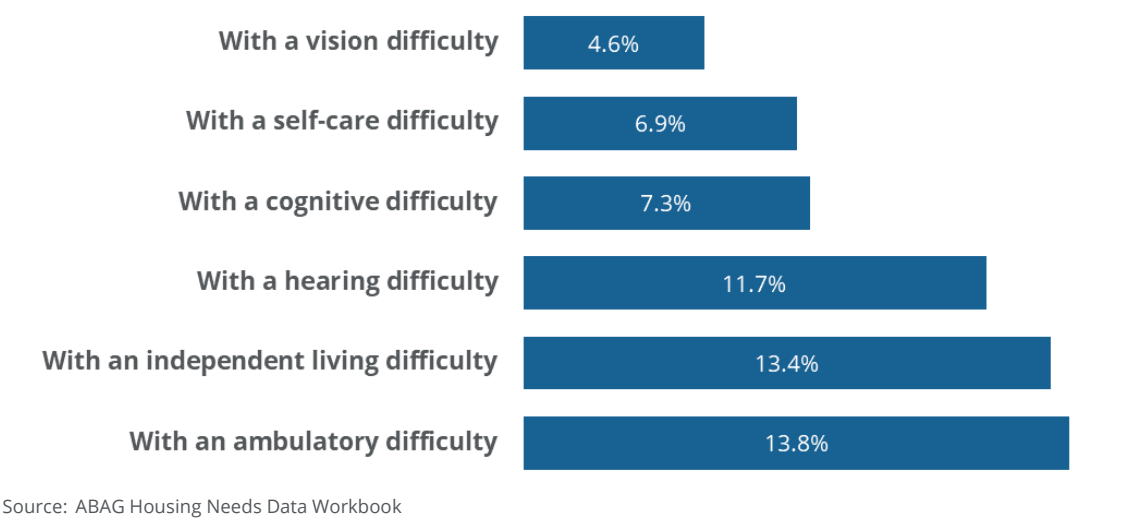


Figure III-20.
Employment by Disability Status, City of San Bruno, 2019

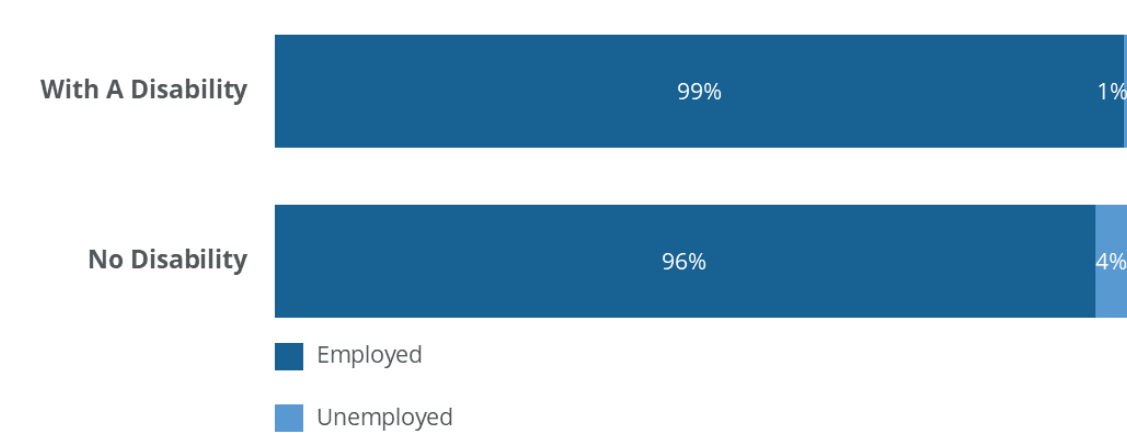
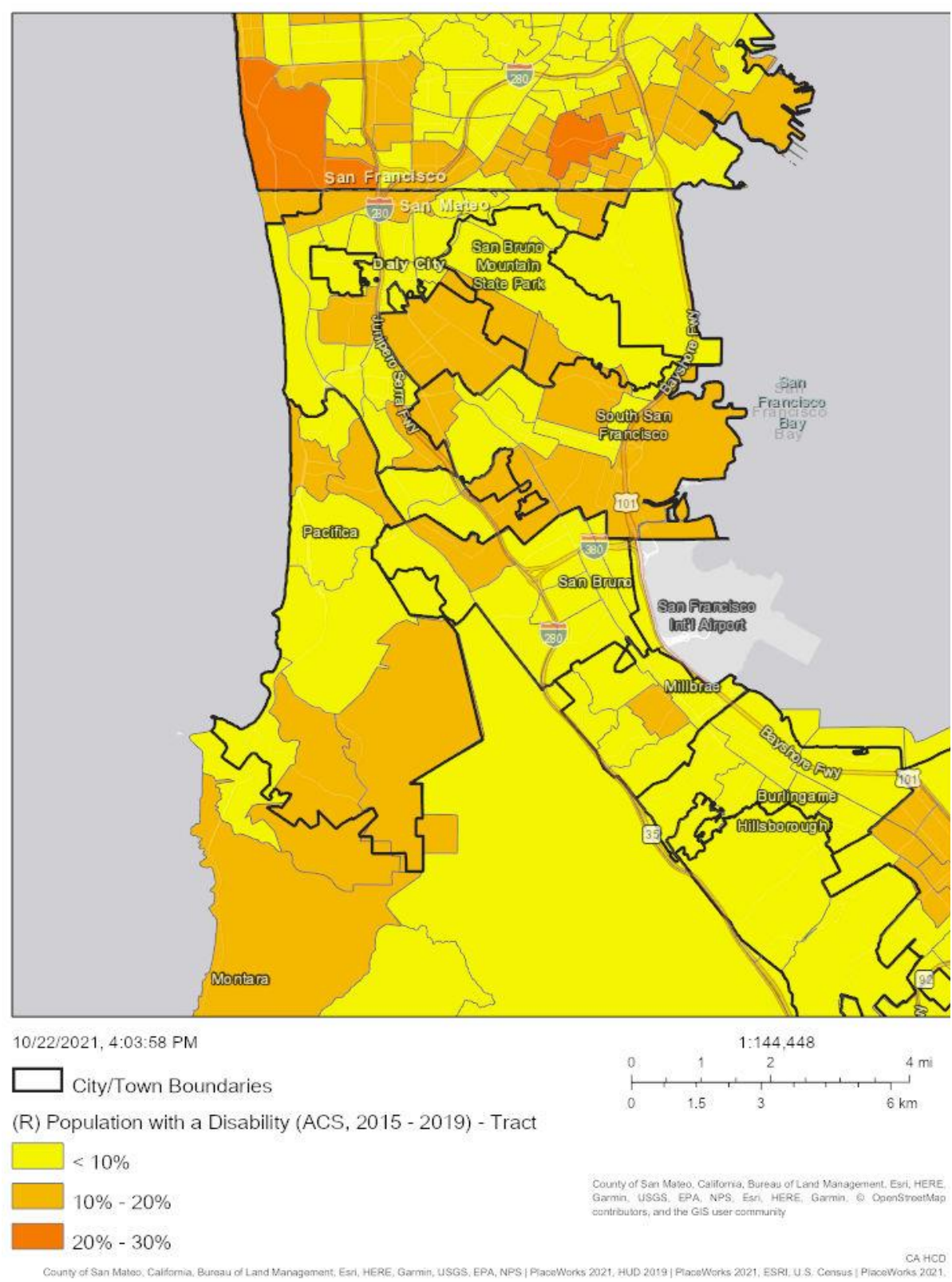


Figure III-21.
Share of Population with a Disability by Census Tract, 2019



Source: California Department of Housing and Community Development AFFH Data Viewer

Figure III-22

[PLACEHOLDER] San Mateo County Housing Policies and Programs Analysis

[Updated Matrix Available December 2021]

San Mateo County Housing Policies and Programs

Compiled by the Association of Bay Area Governments, February 2016 update; revised July 2016 by San Mateo County staff with updates from 21 Elements

Affordable Housing Policies and Programs	Atherton	Belmont	Brisbane	Burlingame	Colma	Daly City	East Palo Alto	Foster City	Half Moon Bay	Hillsborough	Menlo Park	Millbrae	Pacifica	Portola Valley	Redwood City	San Bruno	San Carlos	San Mateo	South San Francisco	Woodside	San Mateo County
Reduced Parking Requirements	N	UC	Y	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	N	Y	UC	Y	Y	Y	N	N
Streamlined Permitting Process	N	N	Y	N	Y	N	Y	Y	Y	Y	Y	Y	N	N	Y	UC	N	N	Y	N	N
Graduated Density Bonus (parcel assembly)	N	N	Y	N	N	N	N	N	N	N	Y	N	N	N	N	Y	N	Y	N	N	N
Form-based codes	N	N	Y	N	N	N	N	N	N	N	Y	N	N	N	Y	N	Y	Y	N	N	N
Admixed Use Zoning	N	Y	Y	Y	N	Y	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y
Housing Overlay Zone	N	N	N	Y	N	N	UC	N	N	N	Y	N	N	N	UC	N	N	Y	N	N	N
Density Bonus Ordinances	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	N	Y
Inclusionary/Below Market Rate Housing Policy	N	N	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Y
Condominium Conversion Ordinance	N	Y	Y	Y	N	Y	Y	Y	Y	N	Y	Y	Y	N	N	N	N	N	Y	N	Y
Just Cause Evictions	N	N	N	N	N	N	Y	N	N	N	N	N	N	N	N	N	N	N	N	N	N
Rent Stabilization	N	N	N	N	N	N	Y	N	N	N	N	N	N	N	N	N	N	N	N	N	N
Acquisition/Rehabilitation/ Conversion Program	N	Y	Y	N	N	Y	N	Y	N	N	N	N	N	N	Y	Y	Y	Y	N	N	N
Preservation of Mobile Homes (Rent Stabilization ordinances)	N	N	Y	N	N	N	Y	N	N	N	N	N	Y	N	N	N	N	N	N	N	Y
SRO Preservation Ordinances	N	N	Y	N	N	N	N	N	N	N	N	N	N	N	N	N	Y	N	Y	N	N
Homeowner Rehabilitation program	N	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	N	N	Y	Y	Y	N	Y	Y	Y
Other Anti-Displacement Strategies	N	N	N	N	N	N	Y	Y	Y	N	Y	Y	N	N	N	N	N	Y	N	N	Y
Reduced Fees or Waivers	N	N	Y	N	N	Y	UC	Y	N	Y	N	N	N	Y	Y	Y	N	N	Y	N	Y
General Fund Allocation Incl. former RDA "Boomerang" Funds	N	N	Y	N	N	N	Y	N	N	N	Y	N	N	N	N	N	UC	N	N	N	N
In-Lieu Fees (Inclusionary Zoning)	N	N	N	UC	N	Y	Y	N	N	N	Y	Y	Y	Y	Y	Y	Y	N	N	N	Y
Housing Development Impact Fee	N	UC	Y	UC	UC	Y	Y	N	N	N	Y	N	N	Y	Y	UC	Y	Y	N	N	Y
Commercial Development Impact Fee	N	UC	N	UC	N	N	Y	N	N	N	Y	N	N	N	Y	UC	UC	UC	UC	N	Y
Other taxes or fees dedicated to housing	N	N	N	N	N	Y	Y	N	N	N	N	N	N	N	N	N	Y	Y	N	N	N
Locally Funded Homebuyer Assistance Programs	N	Y	Y	N	N	N	UC	Y	N	N	Y	N	N	N	Y	N	N	N	N	N	N
Tenant-Based Assistance	N	N	N	N	N	N	Y	N	Y	N	N	N	N	N	N	N	N	N	N	N	N
Home sharing programs	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	N	N	Y	N	Y	Y
Has Public Housing? (Y/N)	N	N	N	N	N/A	Y	N	N	N/A	N	N	N/A	N	N/A	N	N/A	N	N	N/A	N	Y
Has Group Homes? (Y/N)	Y	N	Y	Y	N/A	Y	Y	Y	N/A	Y	Y	N/A	N	N/A	Y	N/A	Y	Y	N/A	N	Y
Has a Second Unit Ordinance? (Y/N)	Y	N	Y	Y	N/A	Y	Y	Y	N/A	Y	Y	N/A	Y	Y	Y	N/A	N	Y	N/A	Y	Y
Has Emergency Shelters? (Y/N)	N	N	N	N/A	N	Y	Y	N/A	Y	Y	N/A	N	N/A	N	Y	N/A	N	Y	N/A	N	Y
Has Affordable Housing Complexes? (Y/N)	N	N	Y	N	N/A	Y	Y	N	N/A	N	Y	N/A	Y	N/A	Y	N/A	Y	Y	N/A	N	Y

ABAG tracked thirty housing policy and program types that represent the most prevalent and important strategies for fostering development of both market rate and affordable housing units. ABAG Staff compiled a summary of policies adopted by each jurisdiction based on the jurisdiction's certified 2007-2014 housing element, and sent the summary to local staff for verification. We have indicated instances in which we were not able to verify or obtain information.

Legend:

Y: The policy or program is currently in effect in the jurisdiction

N: The policy or program is not in effect in the jurisdiction

UC: The policy or program is currently under consideration by the jurisdiction

N/A: Indicates information was unavailable for jurisdiction

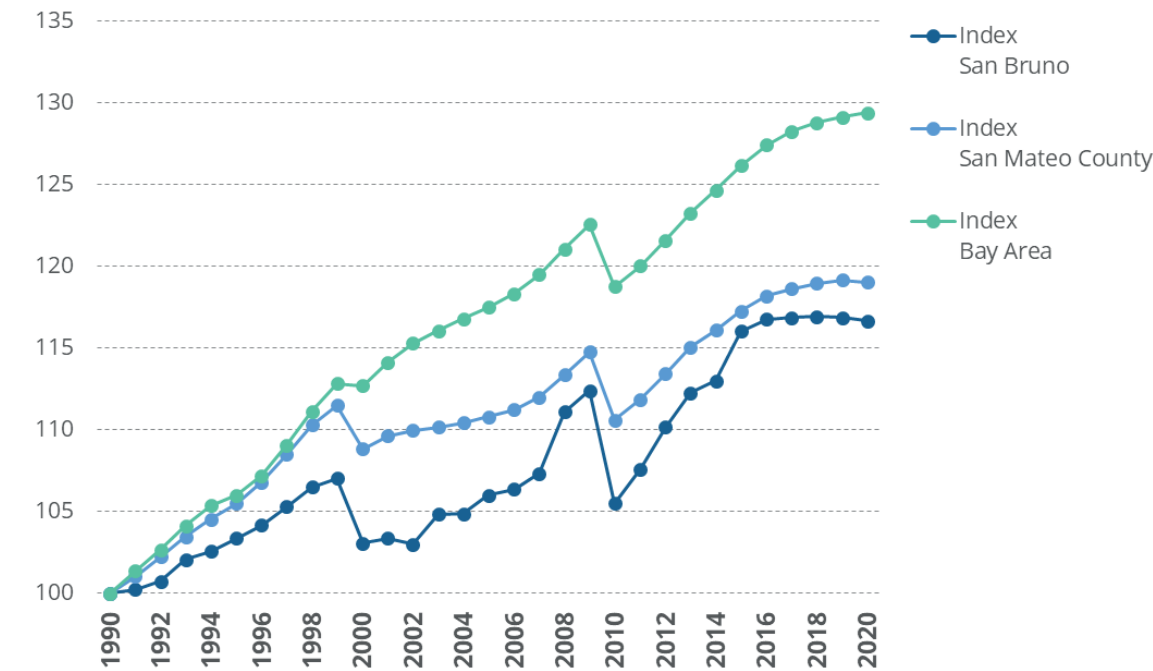
Source: ABAG.

SECTION IV. Disproportionate Housing Needs

Housing needs.

Figure IV-1.

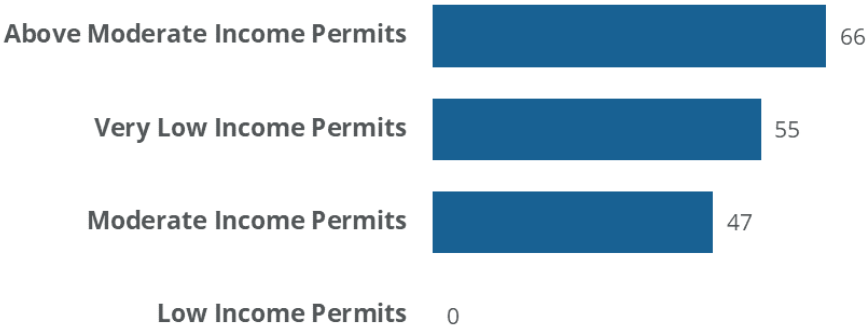
Population Indexed to 1990



Source: ABAG Housing Needs Data Workbook

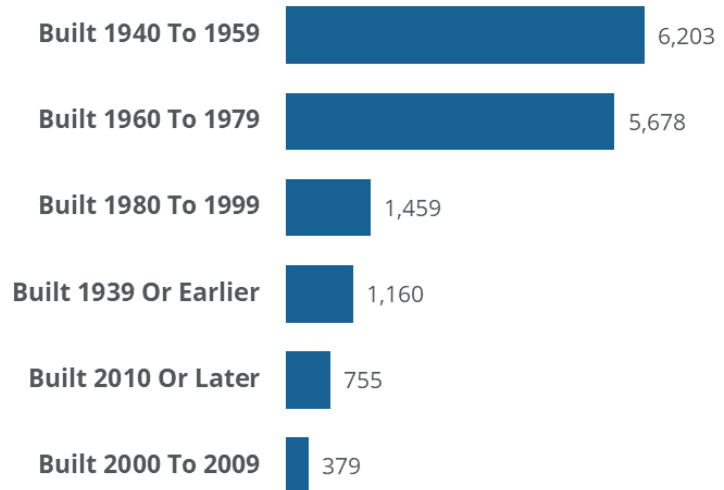
Figure IV-2.
Housing Permits
Issued by Income
Group, City of
Bruno, 2015-2019

Source:
ABAG Housing Needs Data
Workbook

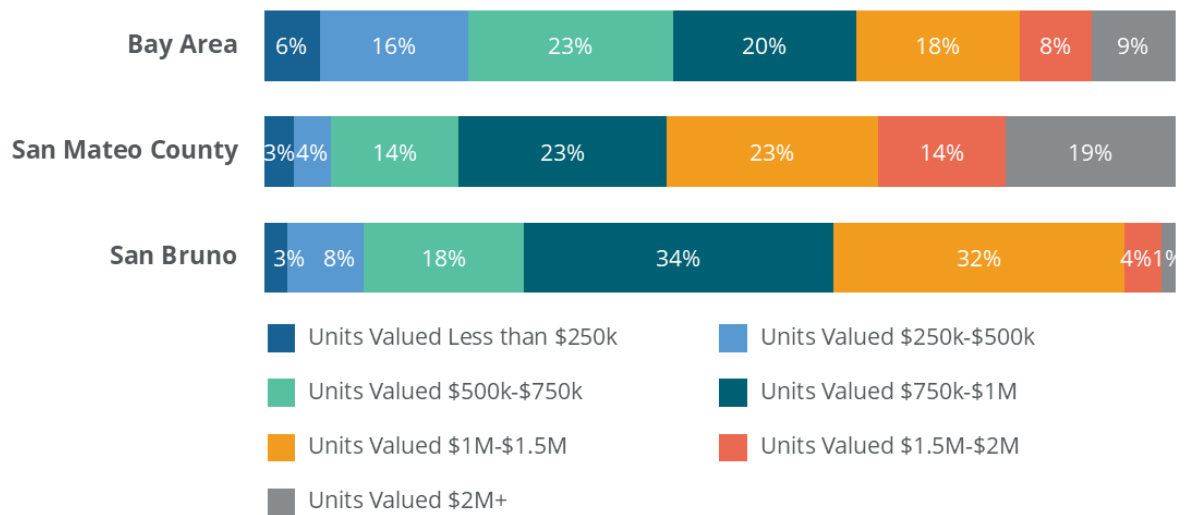


**Figure IV-3.
Housing Units by Year
Built, City of San Bruno**

Source:
ABAG Housing Needs Data Workbook

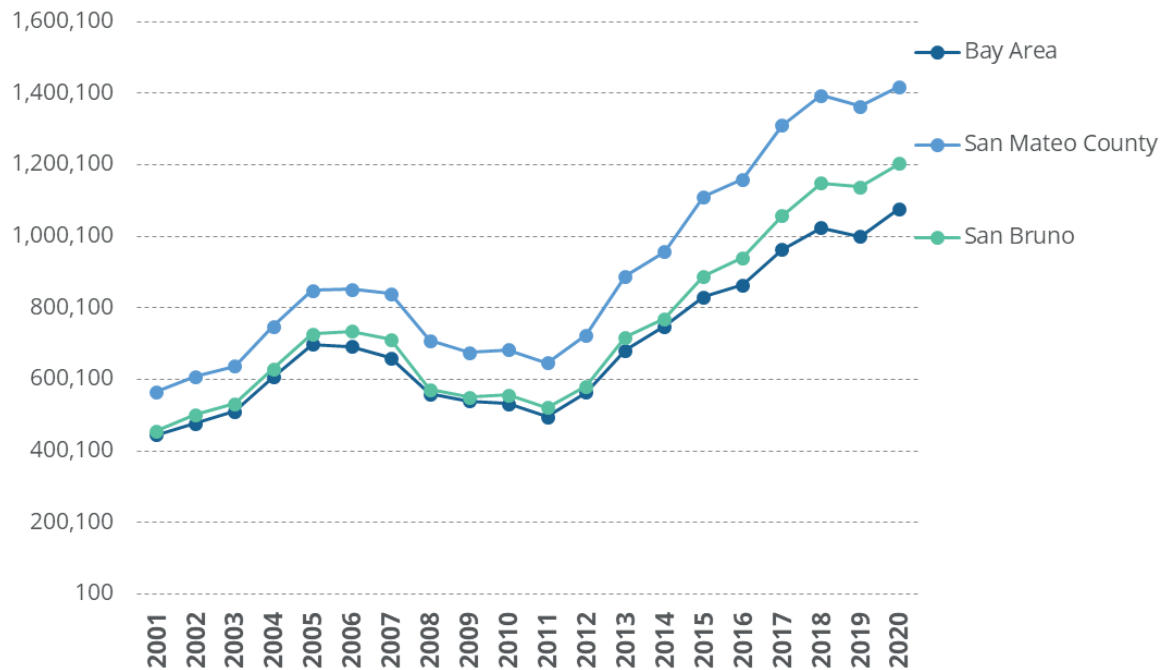


**Figure IV-4.
Distribution of Home Value for Owner Occupied Units, 2019**



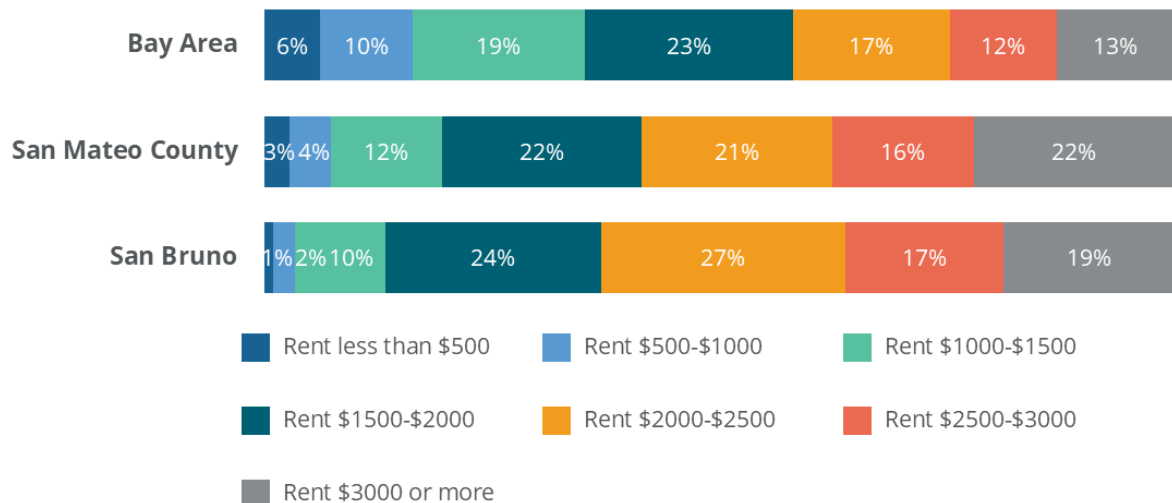
Source: ABAG Housing Needs Data Workbook

Figure IV-5.
Zillow Home Value Index, 2001-2020



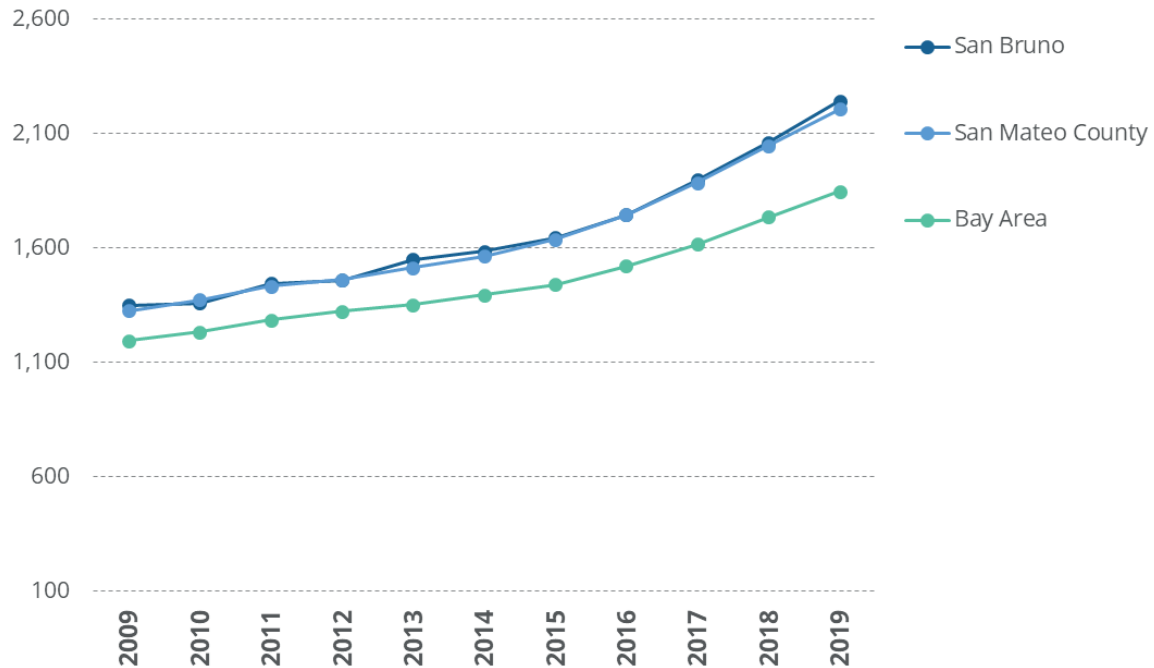
Source: ABAG Housing Needs Data Workbook

Figure IV-6.
Distribution of Contract Rents for Renter Occupied Units, 2019



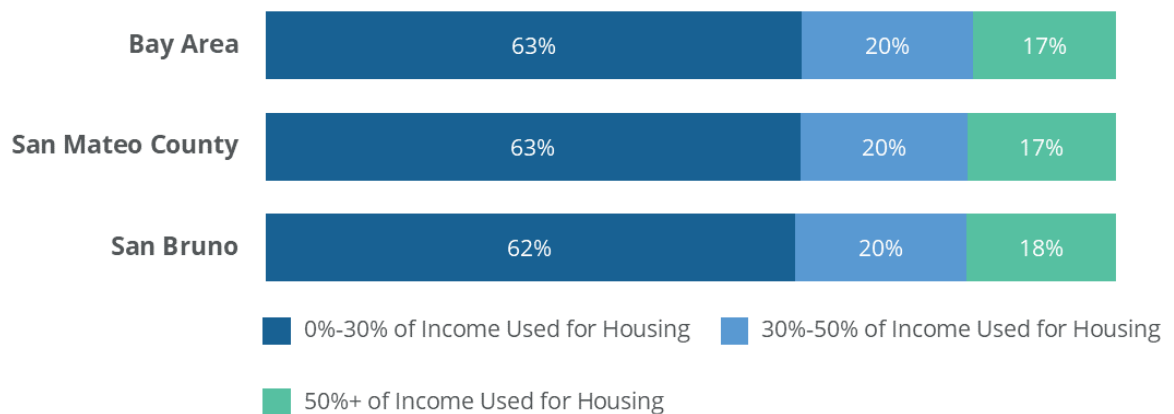
Source: ABAG Housing Needs Data Workbook

Figure IV-7.
Median Contract Rent, 2009-2019



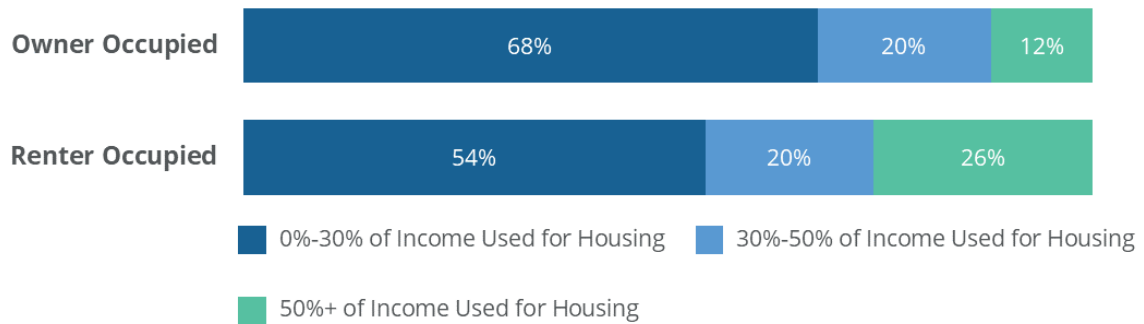
Source: ABAG Housing Needs Data Workbook

Cost burden and severe cost burden.
Figure IV-8.
Overpayment (Cost Burden) by Jurisdiction, 2019



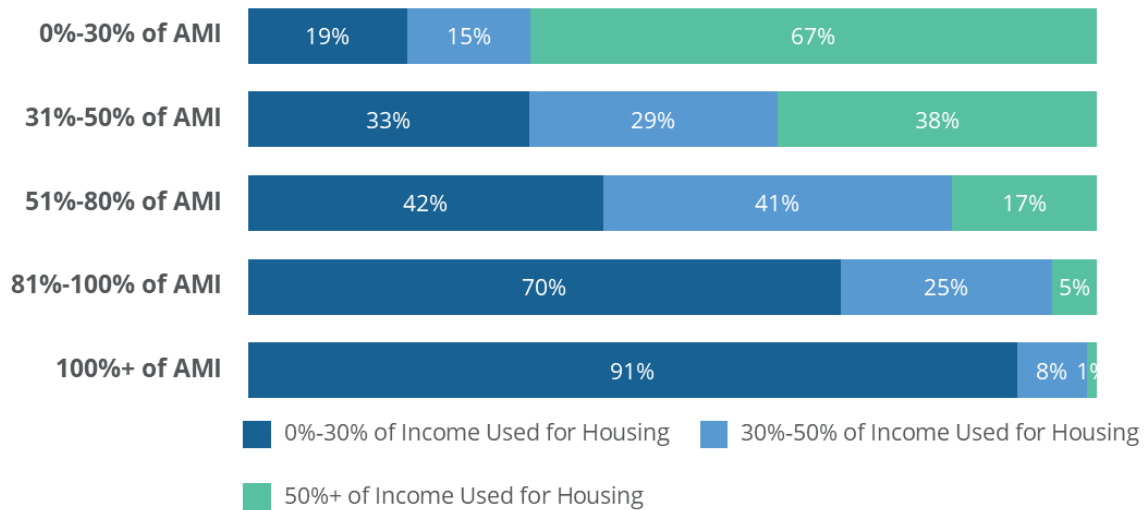
Source: ABAG Housing Needs Data Workbook

Figure IV-9.
Overpayment (Cost Burden) by Tenure, City of San Bruno, 2019



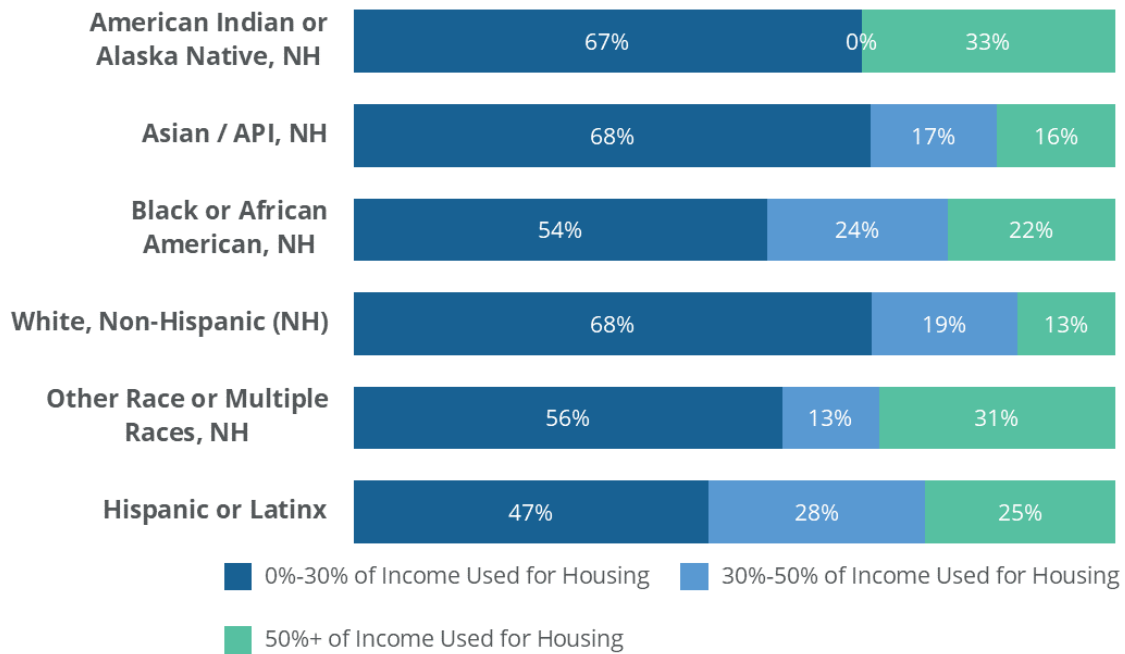
Source: ABAG Housing Needs Data Workbook

Figure IV-10.
Overpayment (Cost Burden) by Area Median Income (AMI), City of San Bruno, 2019



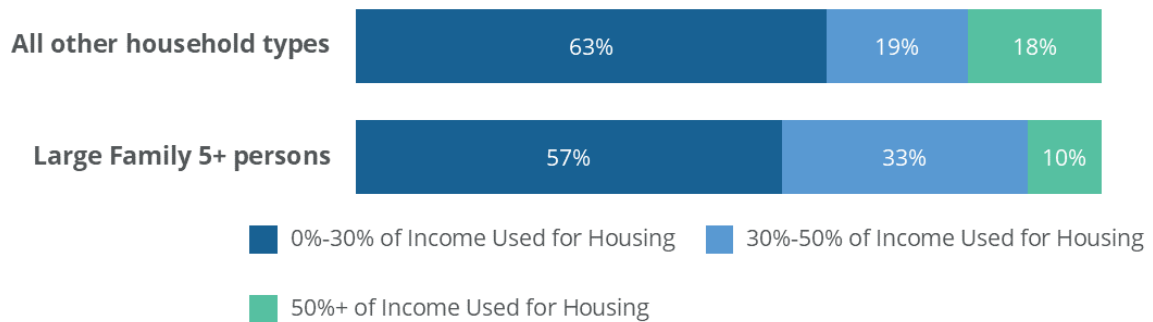
Source: ABAG Housing Needs Data Workbook

Figure IV-11.
Overpayment (Cost Burden) by Race and Ethnicity, City of San Bruno, 2019



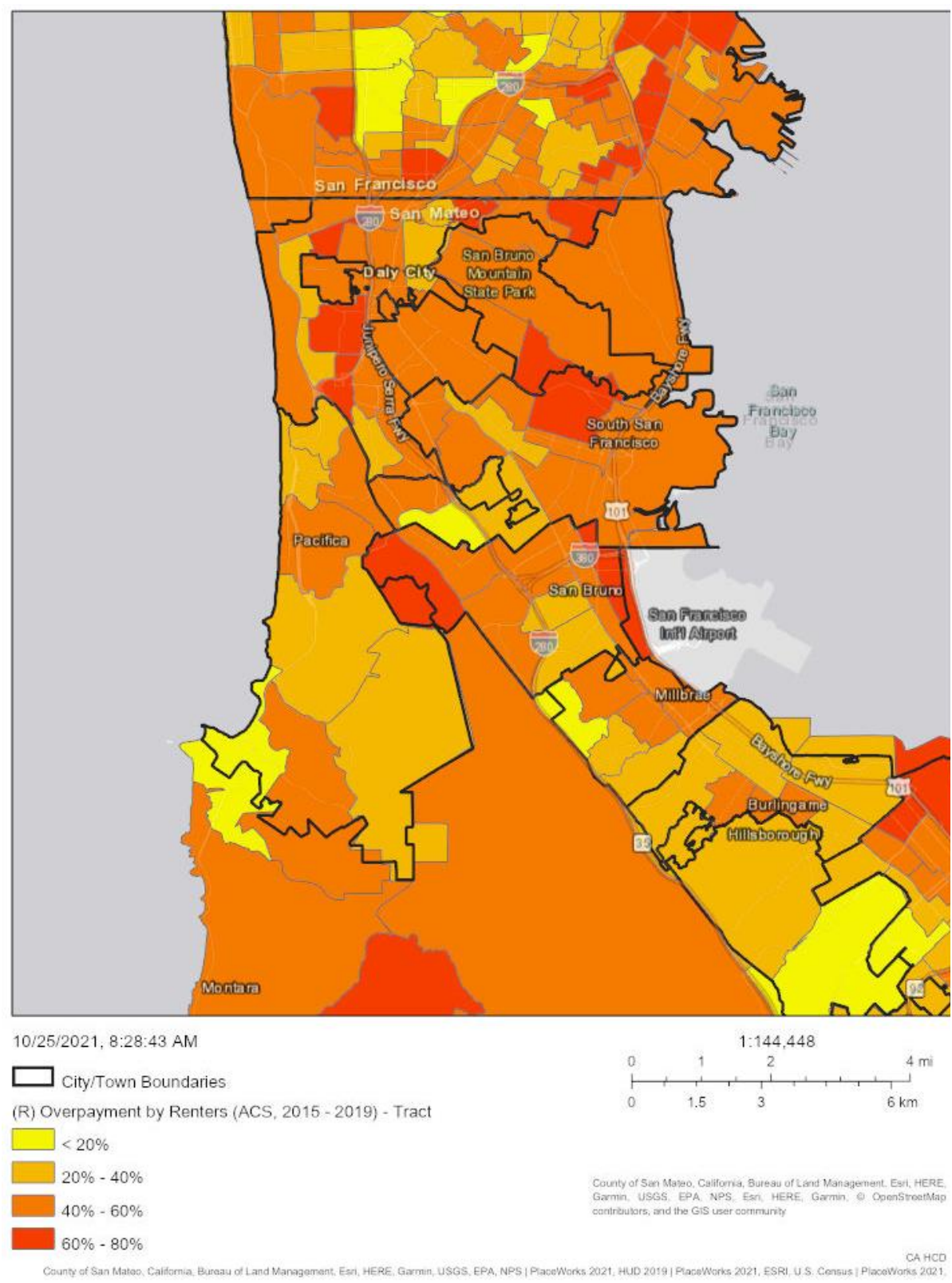
Source: ABAG Housing Needs Data Workbook

Figure IV-12.
Overpayment (Cost Burden) by Family Size, City of San Bruno, 2019



Source: ABAG Housing Needs Data Workbook

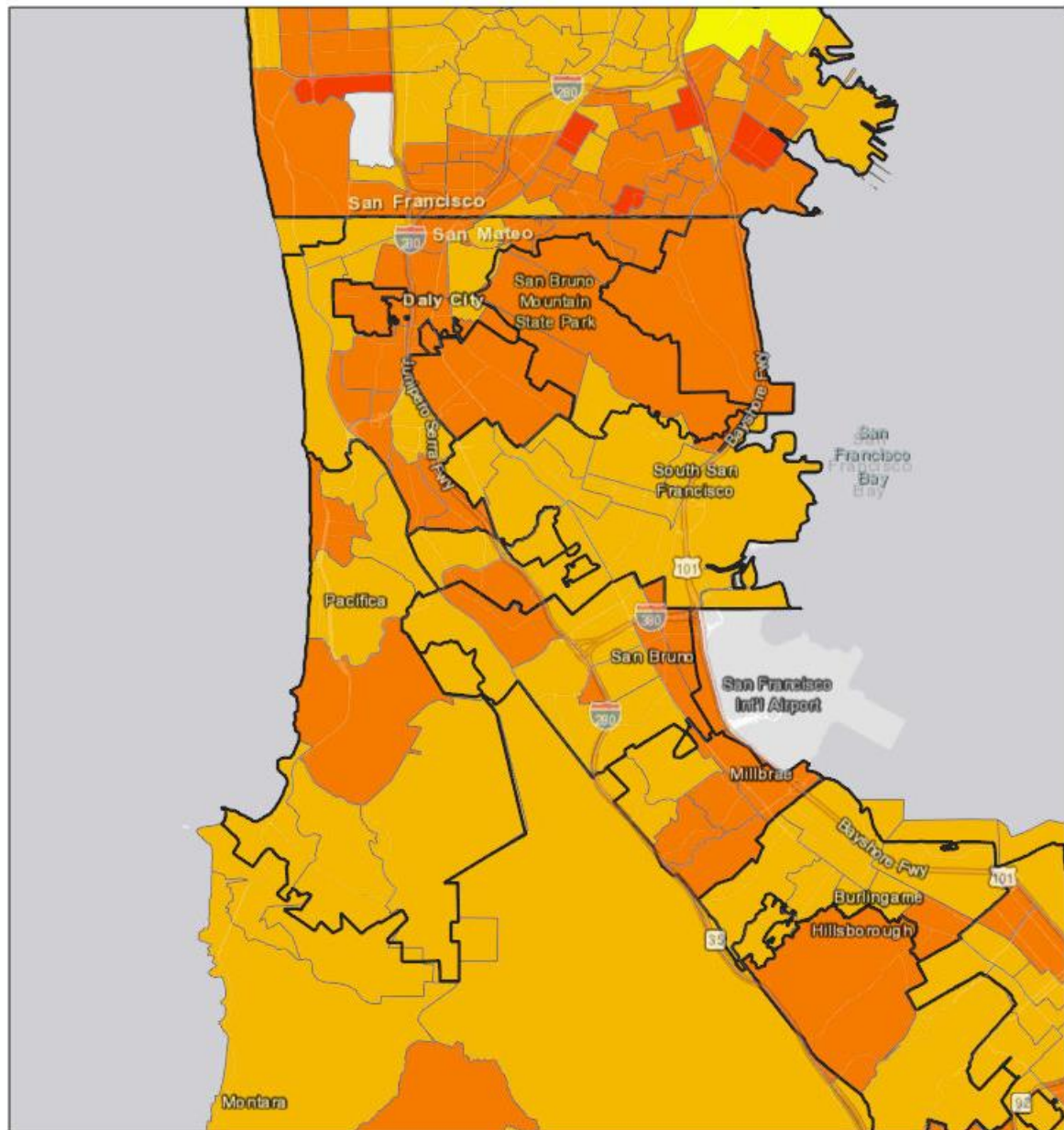
Figure IV-13.
Overpayment (Cost Burden) for Renter Households by Census Tract, 2019



Source: California Department of Housing and Community Development AFFH Data Viewer

Figure IV-14.

Overpayment (Cost Burden) for Owner Households by Census Tract, 2019



10/25/2021, 8:26:17 AM

City/Town Boundaries

(R) Overpayment by Home Owners (ACS, 2015 - 2019) - Tract

- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%

1:144,448
0 1 2 4 mi
0 1.5 3 6 km

County of San Mateo, California, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS, Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community

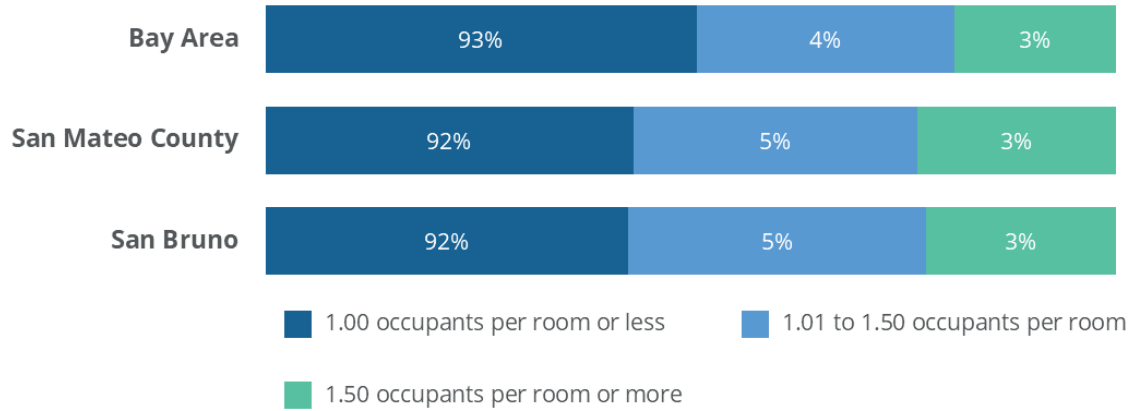
CA HCD
County of San Mateo, California, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021.

Source: California Department of Housing and Community Development AFFH Data Viewer

Overcrowding.

Figure IV-15.

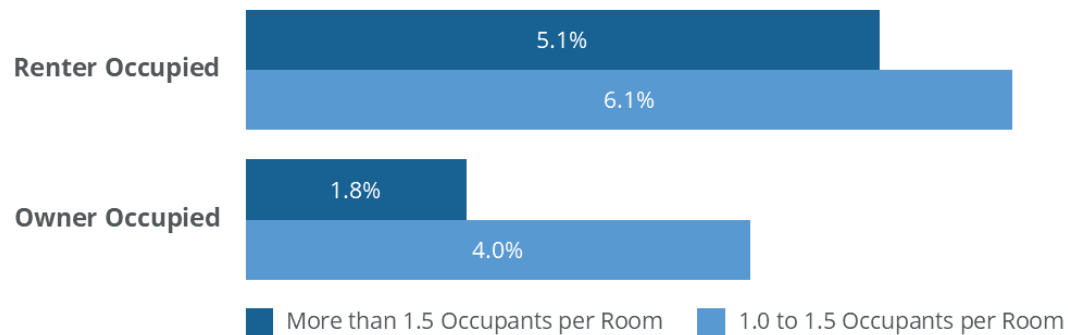
Occupants per Room by Jurisdiction, 2019



Source: ABAG Housing Needs Data Workbook

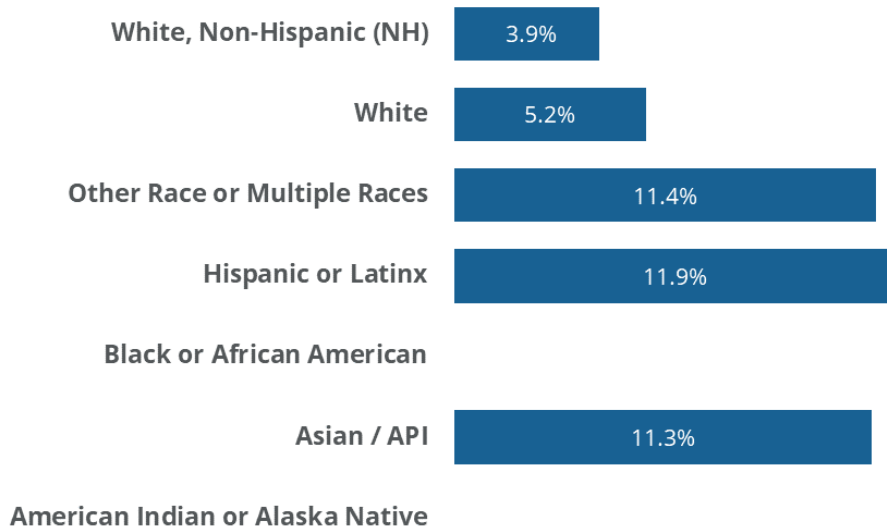
Figure IV-16.

Occupants per Room by Tenure, City of San Bruno, 2019



Source: ABAG Housing Needs Data Workbook

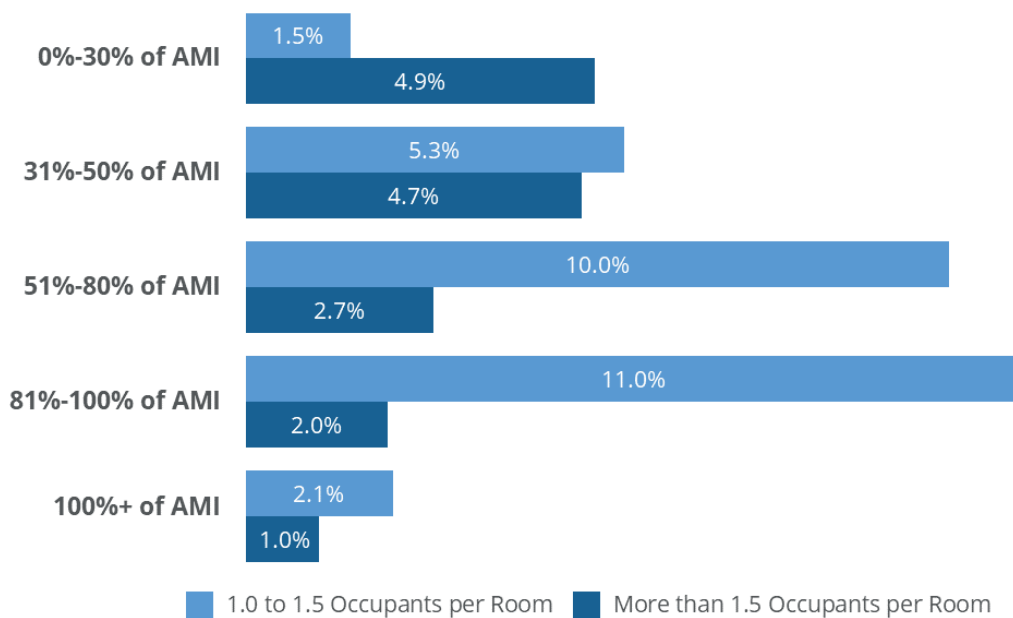
Figure IV-17.
Overcrowding by Race and Ethnicity, City of San Bruno, 2019



Note: Overcrowding is indicated by more than 1 person per room.

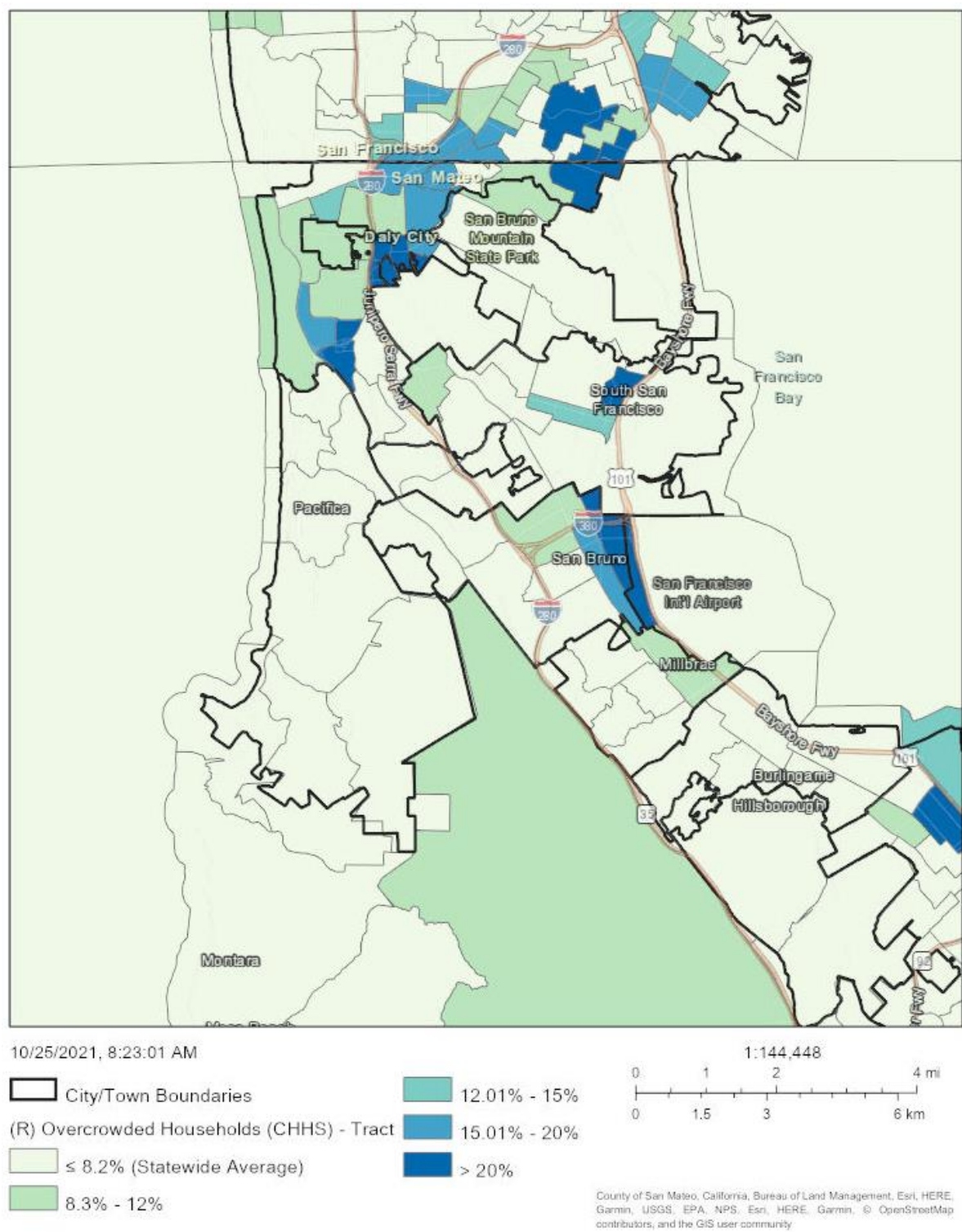
Source: ABAG Housing Needs Data Workbook

Figure IV-18.
Occupants per Room by AMI, City of San Bruno, 2019



Source: ABAG Housing Needs Data Workbook

Figure IV-19.
Overcrowded Households by Census Tract, 2019

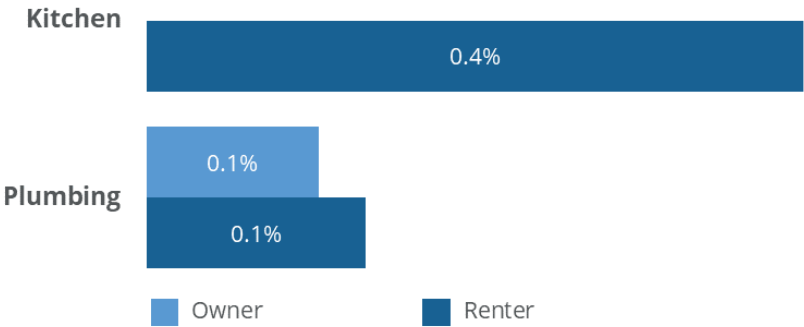


Source: California Department of Housing and Community Development AFFH Data Viewer

Substandard housing.

Figure IV-20.

Percent of Units Lacking Complete Kitchen and Plumbing Facilities, City of San Bruno, 2019



Source: ABAG Housing Needs Data Workbook

Homelessness.

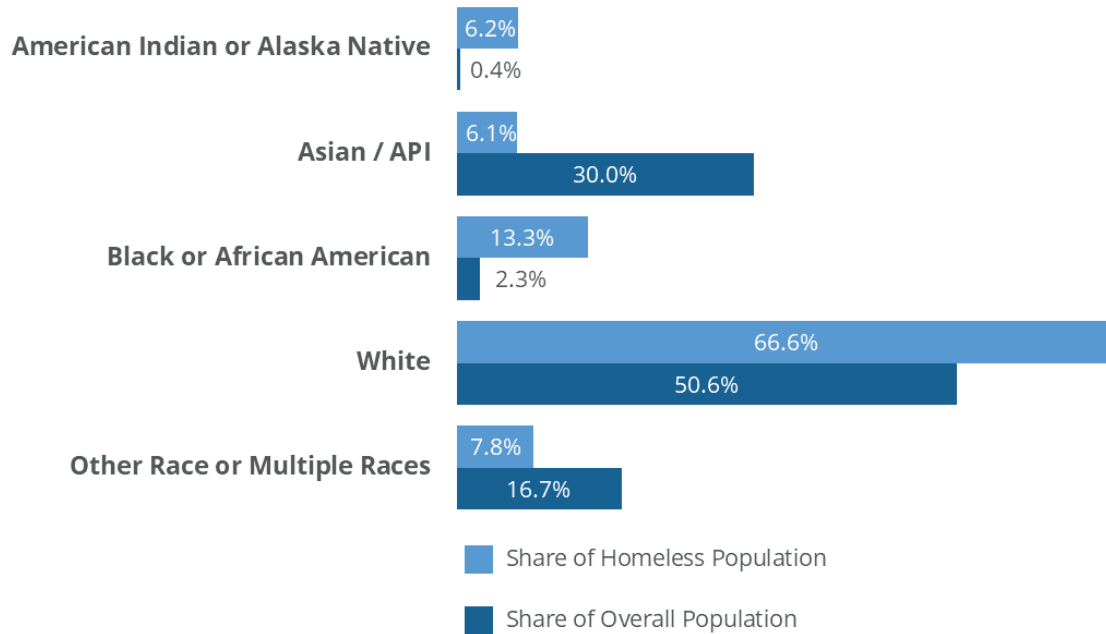
Figure IV-21.

Homelessness by Household Type and Shelter Status, San Mateo County, 2019

	People in Households Solely Children	People in Households with Adults and Children	People in Households Without Children
Sheltered - Emergency Shelter	0	68	198
Sheltered - Transitional Housing	0	271	74
Unsheltered	1	62	838

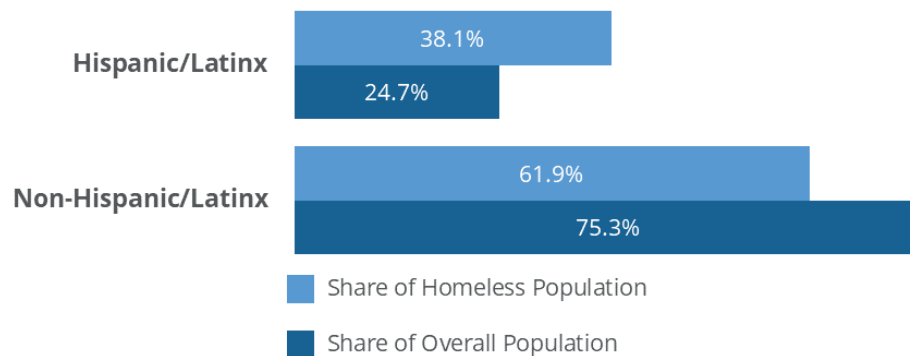
Source:
ABAG Housing Needs Data
Workbook

Figure IV-22.
Share of General and Homeless Populations by Race, San Mateo County, 2019



Source: ABAG Housing Needs Data Workbook

Figure IV-23.
Share of General and Homeless Populations by Ethnicity, San Mateo County, 2019



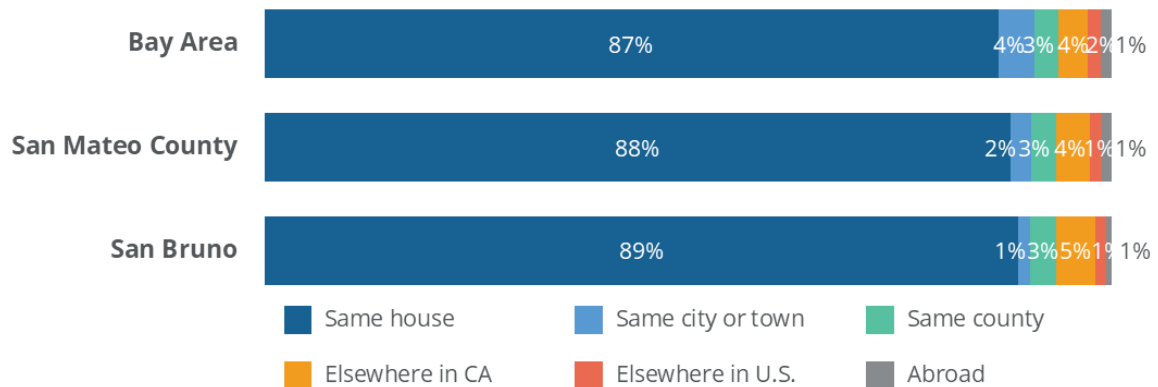
Source: ABAG Housing Needs Data Workbook

Figure IV-24.
Characteristics of the Population Experiencing Homelessness, San Mateo County, 2019

	Chronic Substance Abuse	HIV/AIDS	Severely Mentally Ill	Veterans	Victims of Domestic Violence
Sheltered - Emergency Shelter	46	0	70	31	10
Sheltered - Transitional Housing	46	3	46	4	14
Unsheltered	20	0	189	34	103

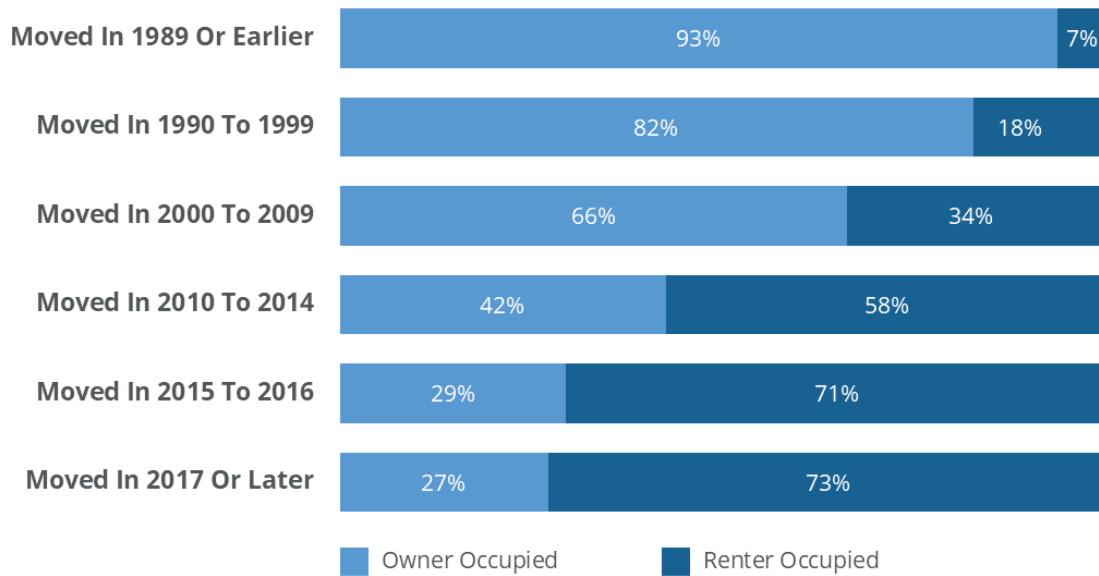
Source: ABAG Housing Needs Data Workbook

Displacement.
Figure IV-25.
Location of Population One Year Ago, City of San Bruno, 2019



Source: ABAG Housing Needs Data Workbook

Figure IV-26.
Tenure by Year Moved to Current Residence, City of San Bruno, 2019



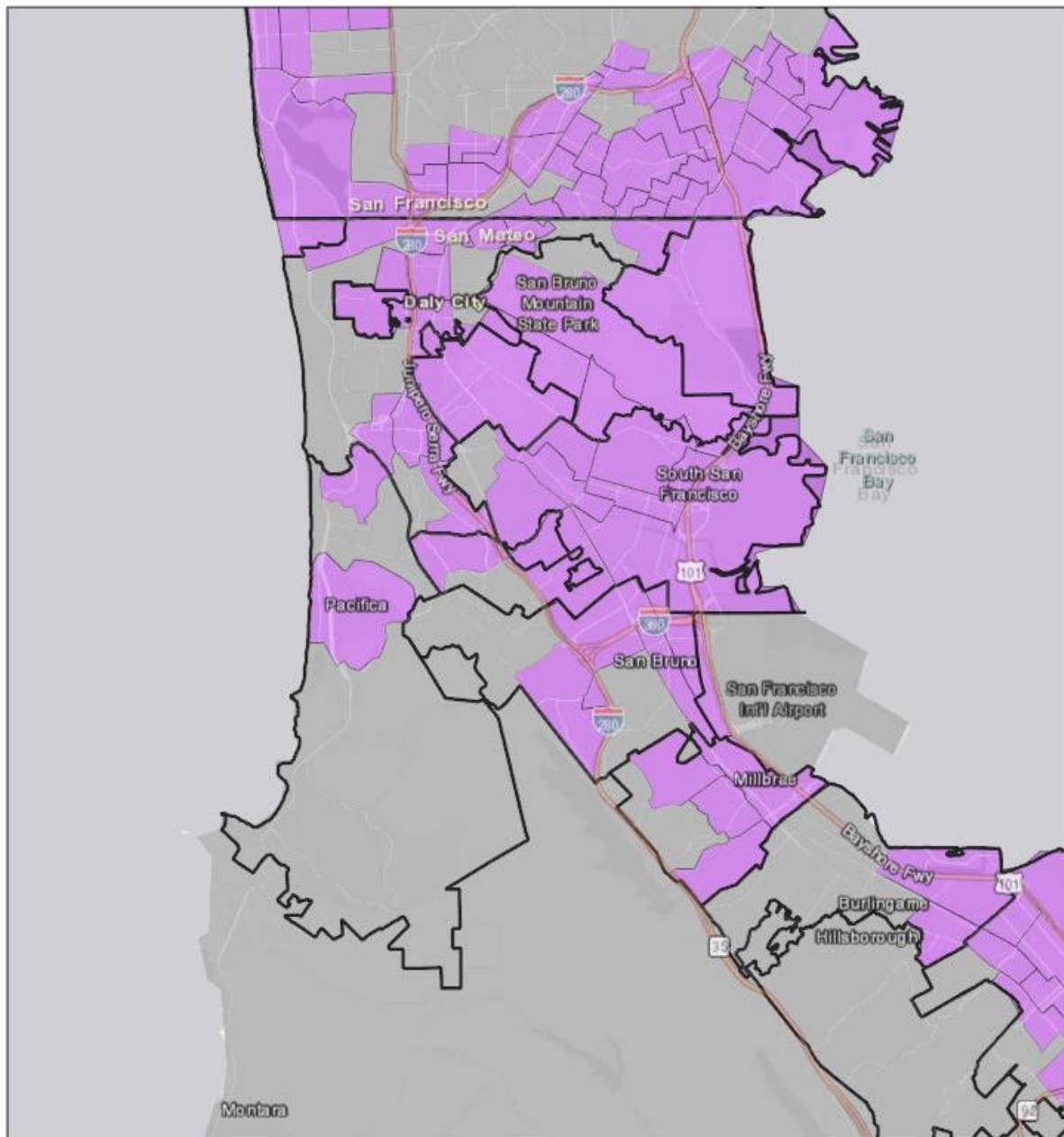
Source: ABAG Housing Needs Data Workbook

Figure IV-27.
Assisted Units at Risk of Conversion, City of San Bruno, 2019


	Low	Moderate	High	Very High	Total Assisted Units in Database
San Bruno	323	0	0	0	323
San Mateo County	4,656	191	359	58	5,264
Bay Area	110,177	3,375	1,854	1,053	116,459

Source: ABAG Housing Needs Data Workbook

Figure IV-28.
Census Tracts Vulnerable to Displacement



10/25/2021, 8:36:42 AM

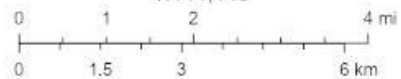
 City/Town Boundaries

(A) Sensitive Communities (UCB, Urban Displacement Project)

 Vulnerable

Other

1:144,448



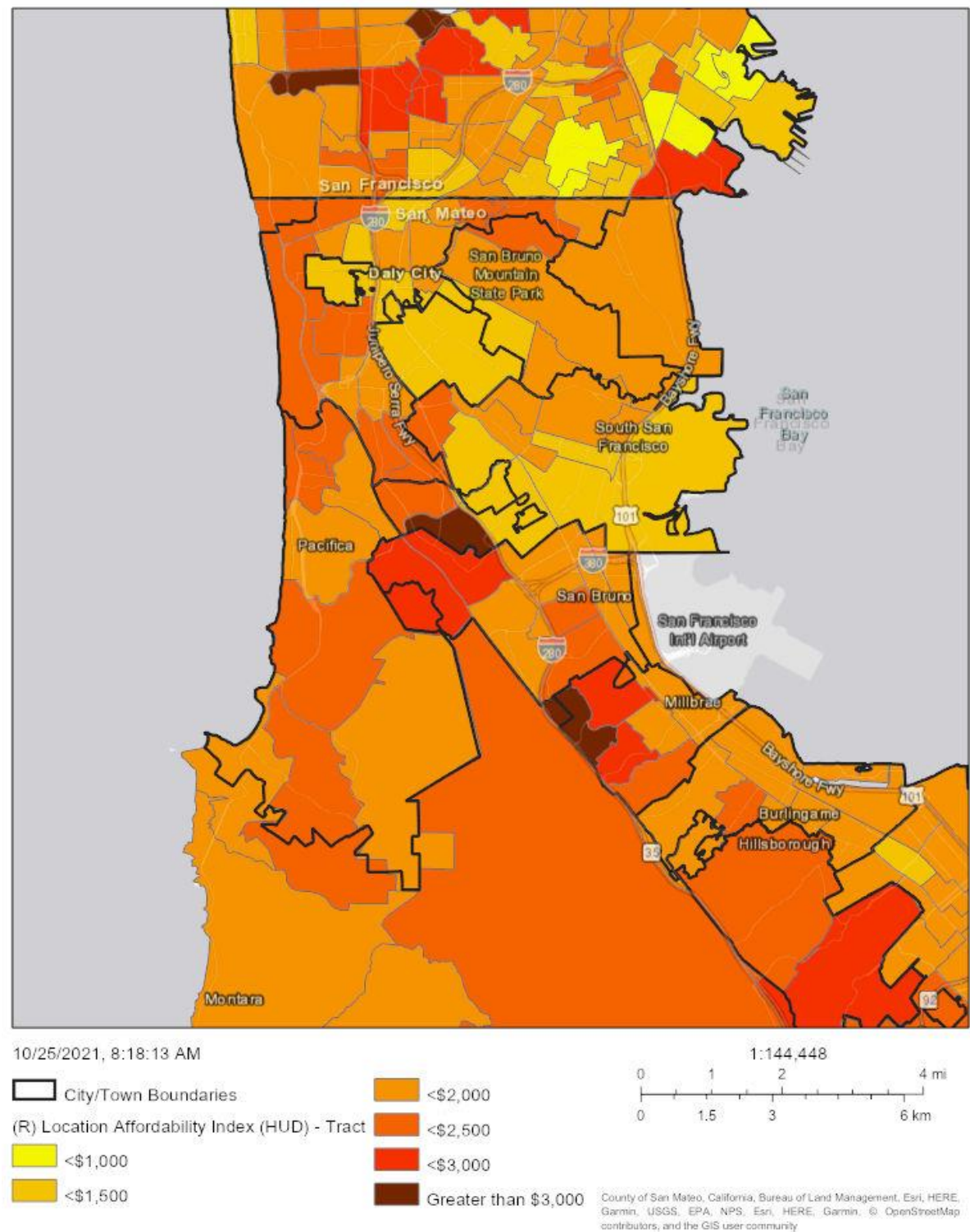
County of San Mateo, California, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS, Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community

CA HCD

County of San Mateo, California, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021.

Source: California Department of Housing and Community Development AFFH Data Viewer

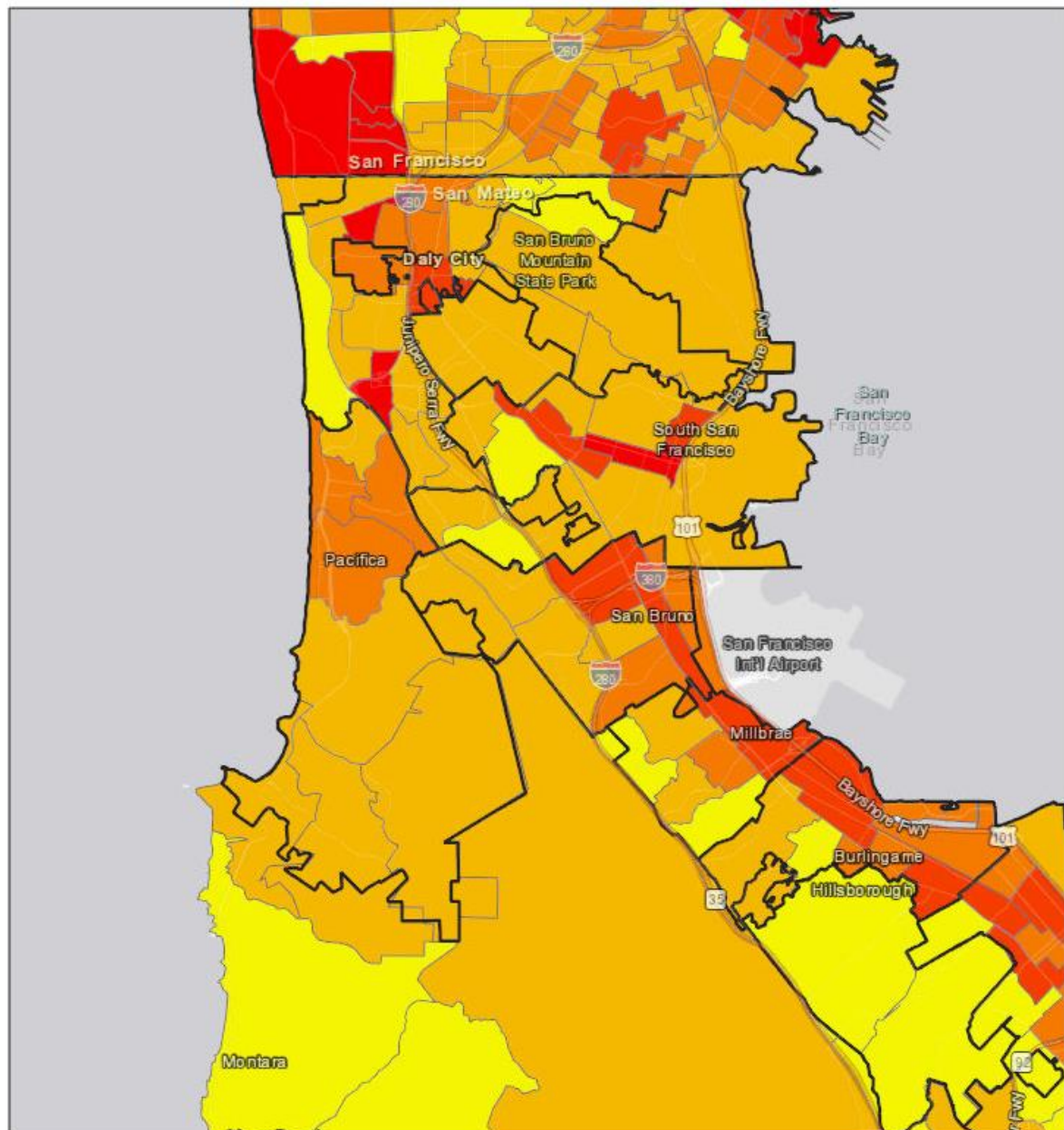
Figure IV-29.
Location Affordability Index by Census Tract



Source: California Department of Housing and Community Development AFFH Data Viewer

Figure IV-30.

Share of Renter Occupied Households by Census Tract, 2019



10/25/2021, 8:13:20 AM

City/Town Boundaries

(R) Percent of households in renter - occupied housing units (HUD) - Tract

- ≤ 20 %
- 20% - 40%
- 40% - 60%
- 60% - 80%
- > 80%

1:144,448

0 1 2 4 mi

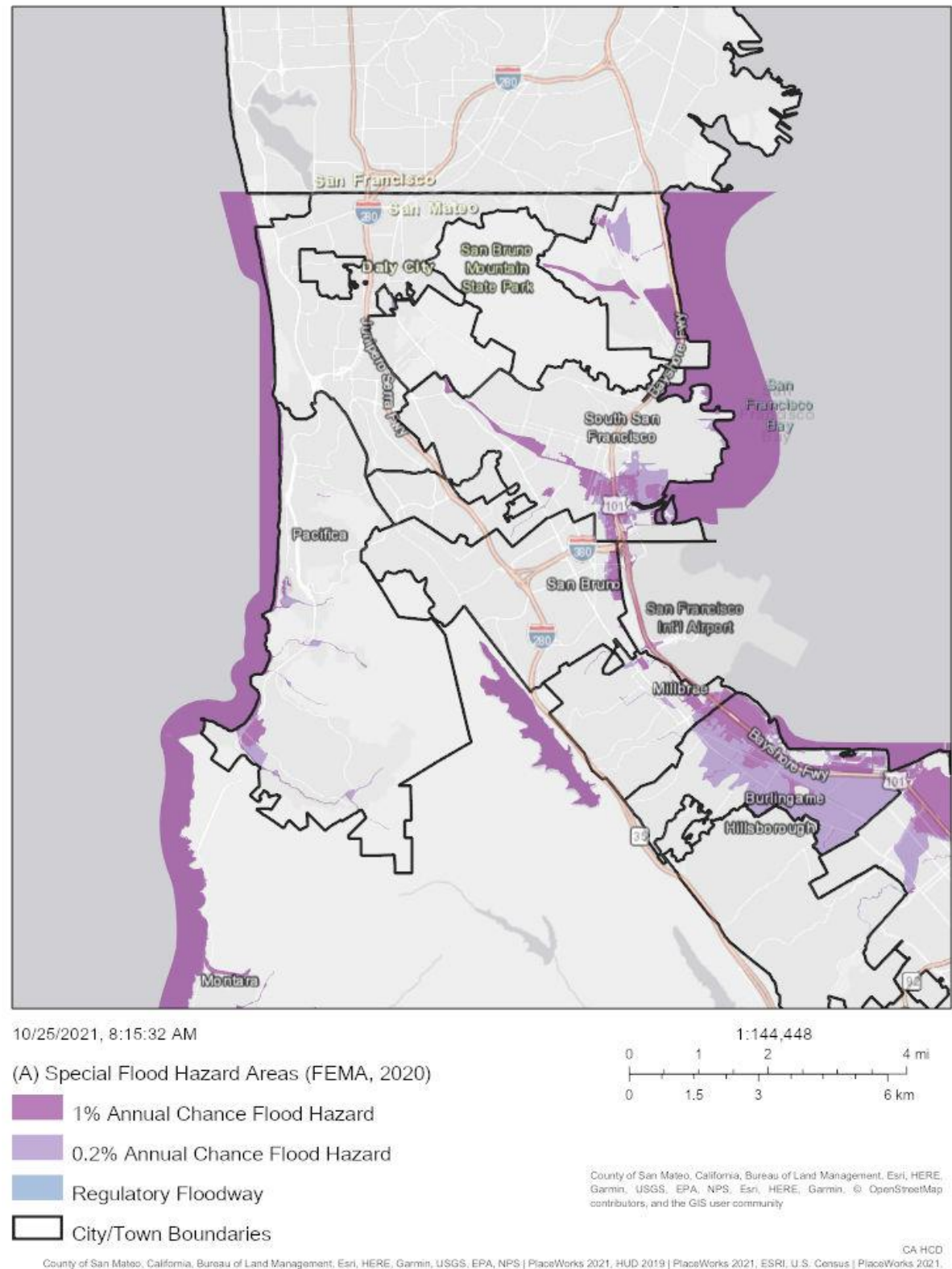
0 1.5 3 6 km

County of San Mateo, California, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS, Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community

CA HCD
County of San Mateo, California, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021.

Source: California Department of Housing and Community Development AFFH Data Viewer

Figure IV-31.
Special Flood Hazard Areas, 2000

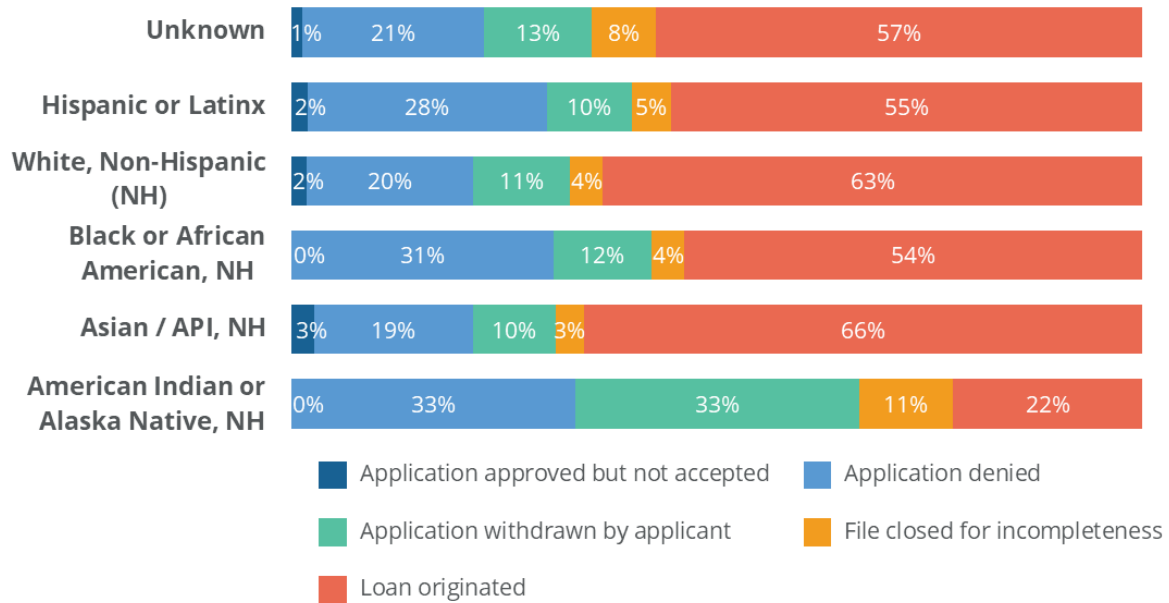


Source: California Department of Housing and Community Development AFFH Data Viewer

Other considerations.

Figure IV-32.

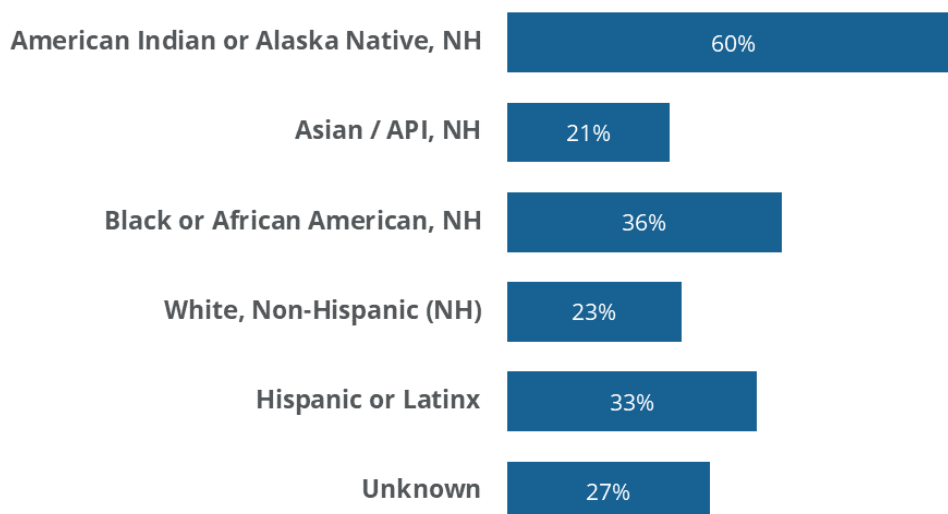
Mortgage Applications by Race and Ethnicity, City of San Bruno, 2018-2019



Source: ABAG Housing Needs Data Workbook

Figure IV-33.

Mortgage Application Denial Rate by Race and Ethnicity, City of San Bruno, 2018-2019



Source: ABAG Housing Needs Data Workbook

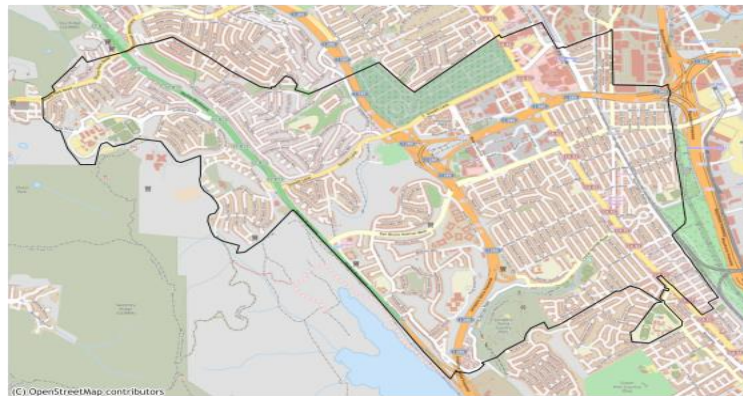
Appendix E

San Bruno AFFH Segregation Report

AFFH SEGREGATION REPORT: SAN BRUNO

UC Merced Urban Policy Lab and ABAG/MTC Staff

Version of Record: March 06, 15:55:48



ASSOCIATION OF BAY AREA GOVERNMENTS
METROPOLITAN TRANSPORTATION COMMISSION



Technical Assistance
for Local Planning
HOUSING

0.1 Table of content

0.1	Table of content	2
0.2	List of figures	3
0.3	List of tables	3
1	Introduction	4
1.1	Purpose of this Report	4
1.2	Defining Segregation	5
1.3	Segregation Patterns in the Bay Area	5
1.4	Segregation and Land Use	6
2	Racial Segregation in City of San Bruno	8
2.1	Neighborhood Level Racial Segregation (within City of San Bruno)	8
2.2	Regional Racial Segregation (between San Bruno and other jurisdictions)	16
3	Income Segregation in City of San Bruno	21
3.1	Neighborhood Level Income Segregation (within San Bruno)	21
3.2	Regional Income Segregation (between San Bruno and other jurisdictions)	27
4	Appendix 1: Summary of Findings	31
4.1	Segregation in City of San Bruno	31
4.2	Segregation Between City of San Bruno and Other jurisdictions in the Bay Area Region	31
5	Appendix 2: Segregation Data	33
6	References	37



0.2 List of figures

Figure 1: Racial Dot Map of San Bruno (2020)	9
Figure 2: Racial Isolation Index Values for San Bruno Compared to Other Bay Area Jurisdictions (2020)	11
Figure 3: Racial Dissimilarity Index Values for San Bruno Compared to Other Bay Area Jurisdictions (2020) ..	14
Figure 4: Theil's H Index Values for Racial Segregation in San Bruno Compared to Other Bay Area Jurisdictions (2020)	15
Figure 5: Racial Dot Map of San Bruno and Surrounding Areas (2020)	16
Figure 6: Racial Demographics of San Bruno Compared to All Bay Area Jurisdictions (2020)	18
Figure 7: Comparing the Share of People of Color in San Bruno and Vicinity to the Bay Area (2020)	19
Figure 8: Income Dot Map of San Bruno (2015)	22
Figure 9: Income Group Isolation Index Values for San Bruno Compared to Other Bay Area Jurisdictions (2015)	24
Figure 10: Income Group Dissimilarity Index Values for San Bruno Compared to Other Bay Area Jurisdictions (2015)	26
Figure 11: Income Group Theil's H Index Values for San Bruno Compared to Other Bay Area Jurisdictions (2015)	27
Figure 12: Income Dot Map of San Bruno and Surrounding Areas (2015)	28
Figure 13: Income Demographics of San Bruno Compared to Other Bay Area Jurisdictions (2015)	29

0.3 List of tables

Table 1: Racial Isolation Index Values for Segregation within San Bruno	10
Table 2: Racial Dissimilarity Index Values for Segregation within San Bruno	13
Table 3: Theil's H Index Values for Racial Segregation within San Bruno	15
Table 4: Population by Racial Group, San Bruno and the Region	17
Table 5: Regional Racial Segregation Measures	20
Table 6: Income Group Isolation Index Values for Segregation within San Bruno	23
Table 7: Income Group Dissimilarity Index Values for Segregation within San Bruno	25
Table 8: Theil's H Index Values for Income Segregation within San Bruno	26
Table 9: Population by Income Group, San Bruno and the Region	28
Table 10: Regional Income Segregation Measures	30
Table 11: Neighborhood Racial Segregation Levels in San Bruno	33
Table 12: Neighborhood Income Segregation Levels in San Bruno	34
Table 13: Regional Racial Segregation Measures	35
Table 14: Regional Income Segregation Measures	35
Table 15: Population by Racial Group, San Bruno and the Region	36
Table 16: Population by Income Group, San Bruno and the Region	36

1 INTRODUCTION

The requirement to Affirmatively Further Fair Housing (AFFH) is derived from The Fair Housing Act of 1968, which prohibited discrimination concerning the sale, rental, and financing of housing based on race, color, religion, national origin, or sex—and was later amended to include familial status and disability.¹ The 2015 U.S. Department of Housing and Urban Development (HUD) Rule to Affirmatively Further Fair Housing and California Assembly Bill 686 (2018) mandate that each jurisdiction takes meaningful action to address significant disparities in housing needs and access to opportunity.²³ AB 686 requires that jurisdictions incorporate AFFH into their Housing Elements, which includes inclusive community participation, an assessment of fair housing, a site inventory reflective of AFFH, and the development of goals, policies, and programs to meaningfully address local fair housing issues. ABAG and UC Merced have prepared this report to assist Bay Area jurisdictions with the Assessment of Fair Housing section of the Housing Element.

Assessment of Fair Housing Components

The Assessment of Fair Housing includes five components, which are discussed in detail on pages 22-43 of [HCD's AFFH Guidance Memo](#):

- A: Summary of fair housing enforcement and outreach capacity
- B: Integration and segregation patterns, and trends related to people with protected characteristics
- C: Racially or ethnically concentrated areas of poverty
- D: Disparities in access to opportunity
- E: Disproportionate housing needs, including displacement risk

1.1 Purpose of this Report

This report describes racial and income segregation in Bay Area jurisdictions. Local jurisdiction staff can use the information in this report to help fulfill a portion of the second component of the Assessment of Fair Housing, which requires analysis of integration and segregation patterns and trends related to people with protected characteristics and lower incomes. Jurisdictions will still need to perform a similar analysis for familial status and populations with disability.

This report provides segregation measures for both the local jurisdiction and the region using several indices. For segregation between neighborhoods within a city (intra-city segregation), this report includes isolation indices, dissimilarity indices, and Theil's-H index. The isolation index measures

¹ <https://www.justice.gov/crt/fair-housing-act-2>

² HCD AFFH Guidance Memo

³ The 2015 HUD rule was reversed in 2020 and partially reinstated in 2021.



segregation for a single group, while the dissimilarity index measures segregation between two groups. The Theil's H-Index can be used to measure segregation between all racial or income groups across the city at once. HCD's AFFH guidelines require local jurisdictions to include isolation indices and dissimilarity indices in the Housing Element. Theil's H index is provided in addition to these required measures. For segregation between cities within the Bay Area (inter-city segregation), this report includes dissimilarity indices at the regional level as required by HCD's AFFH guidelines. HCD's AFFH guidelines also require jurisdictions to compare conditions at the local level to the rest of the region; and this report presents the difference in the racial and income composition of a jurisdiction relative to the region as a whole to satisfy the comparison requirement.

1.2 Defining Segregation

Segregation is the separation of different demographic groups into different geographic locations or communities, meaning that groups are unevenly distributed across geographic space. This report examines two spatial forms of segregation: neighborhood level segregation *within* a local jurisdiction and city level segregation *between* jurisdictions in the Bay Area.

Neighborhood level segregation (*within* a jurisdiction, or *intra-city*): Segregation of race and income groups can occur from neighborhood to neighborhood *within* a city. For example, if a local jurisdiction has a population that is 20% Latinx, but some neighborhoods are 80% Latinx while others have nearly no Latinx residents, that jurisdiction would have segregated neighborhoods.

City level segregation (*between* jurisdictions in a region, or *inter-city*): Race and income divides also occur *between* jurisdictions in a region. A region could be very diverse with equal numbers of white, Asian, Black, and Latinx residents, but the region could also be highly segregated with each city comprised solely of one racial group.

There are many factors that have contributed to the generation and maintenance of segregation. Historically, racial segregation stemmed from explicit discrimination against people of color, such as restrictive covenants, redlining, and discrimination in mortgage lending. This history includes many overtly discriminatory policies made by federal, state, and local governments (Rothstein 2017). Segregation patterns are also affected by policies that appear race-neutral, such as land use decisions and the regulation of housing development.

Segregation has resulted in vastly unequal access to public goods such as quality schools, neighborhood services and amenities, parks and playgrounds, clean air and water, and public safety (Trounstein 2015). This generational lack of access for many communities, particularly people of color and lower income residents, has often resulted in poor life outcomes, including lower educational attainment, higher morbidity rates, and higher mortality rates (Chetty and Hendren 2018, Ananat 2011, Burch 2014, Cutler and Glaeser 1997, Sampson 2012, Sharkey 2013).

1.3 Segregation Patterns in the Bay Area

Across the San Francisco Bay Area, white residents and above moderate-income residents are significantly more segregated from other racial and income groups (see Appendix 2). The highest levels of racial segregation occur between the Black and white populations. The analysis completed for this report indicates that the amount of racial segregation both *within* Bay Area cities and *across* jurisdictions in the region has decreased since the year 2000. This finding is consistent with recent research from the Othering and Belonging Institute at UC Berkeley, which concluded that “[a]lthough 7

of the 9 Bay Area counties were more segregated in 2020 than they were in either 1980 or 1990, racial residential segregation in the region appears to have peaked around the year 2000 and has generally declined since.”⁴ However, compared to cities in other parts of California, Bay Area jurisdictions have more neighborhood level segregation between residents from different racial groups. Additionally, there is also more racial segregation *between* Bay Area cities compared to other regions in the state.

1.4 Segregation and Land Use

It is difficult to address segregation patterns without an analysis of both historical and existing land use policies that impact segregation patterns. Land use regulations influence what kind of housing is built in a city or neighborhood (Lens and Monkkonen 2016, Pendall 2000). These land use regulations in turn impact demographics: they can be used to affect the number of houses in a community, the number of people who live in the community, the wealth of the people who live in the community, and where within the community they reside (Trounstine 2018). Given disparities in wealth by race and ethnicity, the ability to afford housing in different neighborhoods, as influenced by land use regulations, is highly differentiated across racial and ethnic groups (Bayer, McMillan, and Reuben 2004).⁵ ABAG/MTC plans to issue a separate report detailing the existing land use policies that influence segregation patterns in the Bay Area.

⁴ For more information, see <https://belonging.berkeley.edu/most-segregated-cities-bay-area-2020>.

⁵ Using a household-weighted median of Bay Area county median household incomes, regional values were \$61,050 for Black residents, \$122,174 for Asian/Pacific Islander residents, \$121,794 for white residents, and \$76,306 for Latinx residents. For the source data, see U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B19013B, Table B19013D, B19013H, and B19013I.



Definition of Terms - Geographies

Neighborhood: In this report, “neighborhoods” are approximated by tracts.⁶ Tracts are statistical geographic units defined by the U.S. Census Bureau for the purposes of disseminating data. In the Bay Area, tracts contain on average 4,500 residents. Nearly all Bay Area jurisdictions contain at least two census tracts, with larger jurisdictions containing dozens of tracts.

Jurisdiction: Jurisdiction is used to refer to the 109 cities, towns, and unincorporated county areas that are members of ABAG. Though not all ABAG jurisdictions are cities, this report also uses the term “city” interchangeably with “jurisdiction” in some places.

Region: The region is the nine-county San Francisco Bay Area, which is comprised of Alameda County, Contra Costa County, Marin County, Napa County, San Francisco County, San Mateo County, Santa Clara County, Solano County, and Sonoma County.

⁶ Throughout this report, neighborhood level segregation measures are calculated using census tract data. However, the racial dot maps in Figure 1 and Figure 5 use data from census blocks, while the income group dot maps in Figure 8 and Figure 12 use data from census block groups. These maps use data derived from a smaller geographic scale to better show spatial differences in where different groups live. Census block groups are subdivisions of census tracts, and census blocks are subdivisions of block groups. In the Bay Area, block groups contain on average 1,500 people, while census blocks contain on average 95 people.



2 RACIAL SEGREGATION IN CITY OF SAN BRUNO

Definition of Terms - Racial/Ethnic Groups

The U.S. Census Bureau classifies racial groups (e.g. white or Black/African American) separately from Hispanic/Latino ethnicity.⁷ This report combines U.S. Census Bureau definitions for race and ethnicity into the following racial groups:

White: Non-Hispanic white

Latinx: Hispanic or Latino of any race⁸

Black: Non-Hispanic Black/African American

Asian/Pacific Islander: Non-Hispanic Asian or Non-Hispanic Pacific Islander

People of Color: All who are not non-Hispanic white (including people who identify as “some other race” or “two or more races”)⁹

2.1 Neighborhood Level Racial Segregation (*within* City of San Bruno)

Racial dot maps are useful for visualizing how multiple racial groups are distributed within a specific geography. The racial dot map of San Bruno in Figure 1 below offers a visual representation of the spatial distribution of racial groups within the jurisdiction. Generally, when the distribution of dots does not suggest patterns or clustering, segregation measures tend to be lower. Conversely, when clusters of certain groups are apparent on a racial dot map, segregation measures may be higher.

⁷ More information about the Census Bureau’s definitions of racial groups is available here:

<https://www.census.gov/topics/population/race/about.html>.

⁸ The term Hispanic has historically been used to describe people from numerous Central American, South American, and Caribbean countries. In recent years, the term Latino or Latinx has become preferred. This report generally uses Latinx to refer to this racial/ethnic group.

⁹ Given the uncertainty in the data for population size estimates for racial and ethnic groups not included in the Latinx, Black, or Asian/Pacific Islander categories, this report only analyzes these racial groups in the aggregate People of Color category.



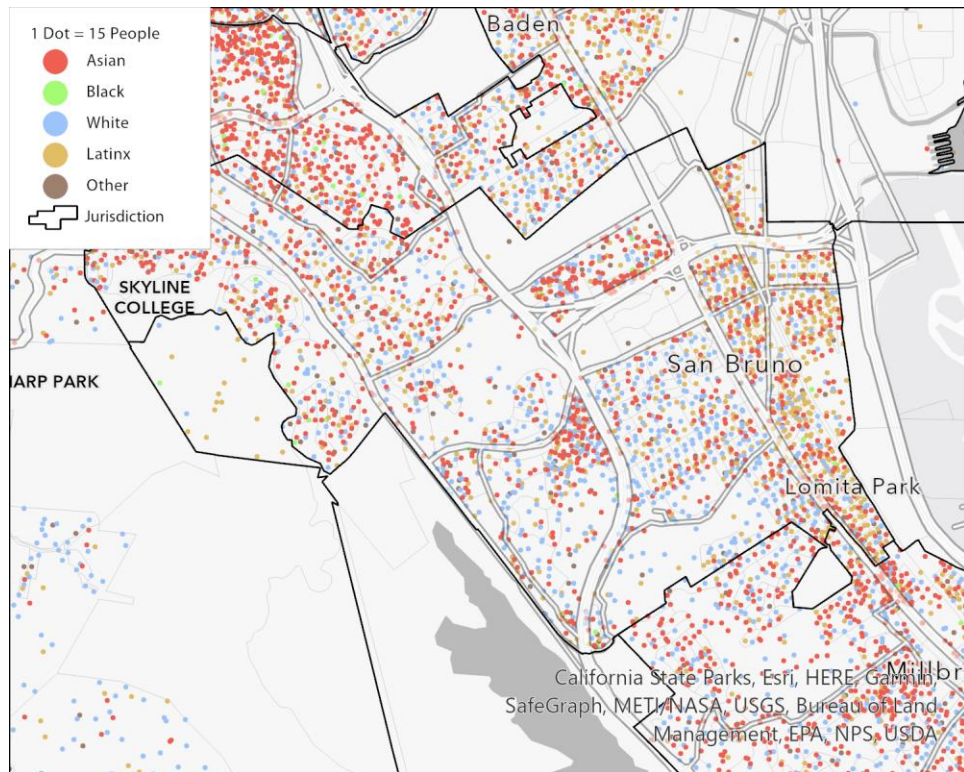


Figure 1: Racial Dot Map of San Bruno (2020)

Universe: Population. Source: U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002.

Note: The plot shows the racial distribution at the census block level for City of San Bruno and vicinity. Dots in each census block are randomly placed and should not be construed as actual placement of people.

There are many ways to quantitatively measure segregation. Each measure captures a different aspect of the ways in which groups are divided within a community. One way to measure segregation is by using an **isolation index**:

- The isolation index compares each neighborhood's composition to the jurisdiction's demographics as a whole.
- This index ranges from 0 to 1. Higher values indicate that a particular group is more isolated from other groups.
- Isolation indices indicate the potential for contact between different groups. The index can be interpreted as the experience of the average member of that group. For example, if the isolation index is .65 for Latinx residents in a city, then the average Latinx resident in that city lives in a neighborhood that is 65% Latinx.

Within City of San Bruno the most isolated racial group is Asian residents. San Bruno's isolation index of 0.369 for Asian residents means that the average Asian resident lives in a neighborhood that is 36.9% Asian. Other racial groups are less isolated, meaning they may be more likely to encounter other racial groups in their neighborhoods. The isolation index values for all racial groups in San Bruno for the years 2000, 2010, and 2020 can be found in Table 1 below. Among all racial groups in this jurisdiction, the white population's isolation index has changed the most over time, becoming less segregated from other racial groups between 2000 and 2020.

The “Bay Area Average” column in this table provides the average isolation index value across Bay Area jurisdictions for different racial groups in 2020.¹⁰ The data in this column can be used as a comparison to provide context for the levels of segregation experienced by racial groups in this jurisdiction. For example, Table 1 indicates the average isolation index value for white residents across all Bay Area jurisdictions is 0.491, meaning that in the average Bay Area jurisdiction a white resident lives in a neighborhood that is 49.1% white.

Table 1: Racial Isolation Index Values for Segregation within San Bruno

	San Bruno			Bay Area Average
Race	2000	2010	2020	2020
Asian/Pacific Islander	0.239	0.315	0.369	0.245
Black/African American	0.025	0.024	0.019	0.053
Latinx	0.322	0.378	0.355	0.251
White	0.518	0.414	0.340	0.491

Universe: Population.

Source: IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002. Data from 2010 is from U.S. Census Bureau, Census 2010, Table P4. Data for 2000 is standardized to 2010 census tract geographies and is from U.S. Census Bureau, Census 2000, Table P004.

Figure 2 below shows how racial isolation index values in San Bruno compare to values in other Bay Area jurisdictions. In this chart, each dot represents a Bay Area jurisdiction. For each racial group, the spread of dots represents the range of isolation index values among Bay Area jurisdictions. Additionally, the black line within each racial group notes the isolation index value for that group in City of San Bruno, and each dashed red line represents the Bay Area average for the isolation index for that group. Local staff can use this chart to contextualize how segregation levels for racial groups in their jurisdiction compare to other jurisdictions in the region.

¹⁰ This average only includes the 104 jurisdictions that have more than one census tract, which is true for all comparisons of Bay Area jurisdictions’ segregation measures in this report. The segregation measures in this report are calculated by comparing the demographics of a jurisdiction’s census tracts to the jurisdiction’s demographics, and such calculations cannot be made for the five jurisdictions with only one census tract (Brisbane, Calistoga, Portola Valley, Rio Vista, and Yountville).

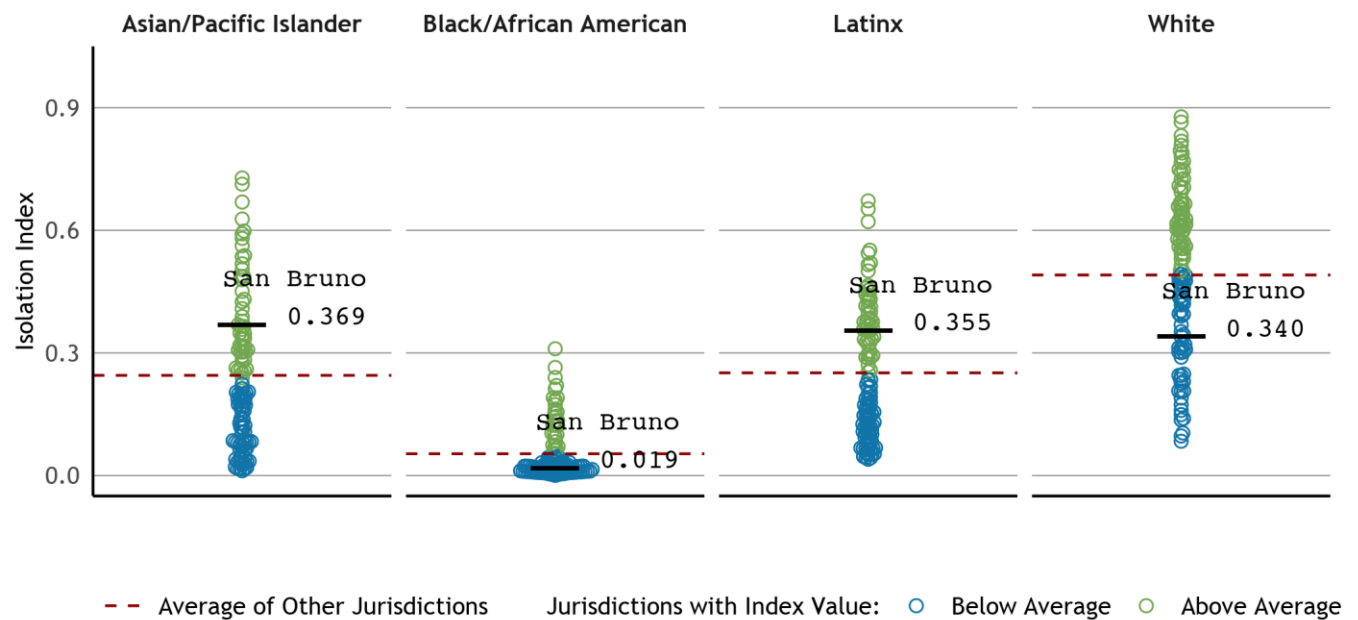


Figure 2: Racial Isolation Index Values for San Bruno Compared to Other Bay Area Jurisdictions (2020)

Universe: Bay Area Jurisdictions.

Source: IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002.

Another way to measure segregation is by using a **dissimilarity index**:

- This index measures how evenly any two groups are distributed across neighborhoods relative to their representation in a city overall. The dissimilarity index at the jurisdiction level can be interpreted as the share of one group that would have to move neighborhoods to create perfect integration for these two groups.
- The dissimilarity index ranges from 0 to 1. Higher values indicate that groups are more unevenly distributed (e.g. they tend to live in different neighborhoods).

Dissimilarity Index Guidance for Cities with Small Racial Group Populations

The analysis conducted for this report suggests that dissimilarity index values are unreliable for a population group if that group represents approximately less than 5% of the jurisdiction's total population.

HCD's AFFH guidance requires the Housing Element to include the dissimilarity index values for racial groups, but also offers flexibility in emphasizing the importance of various measures. ABAG/MTC recommends that when cities have population groups that are less than 5% of the jurisdiction's population (see Table 4), jurisdiction staff use the isolation index or Thiel's H-Index to gain a more accurate understanding of their jurisdiction's neighborhood-level segregation patterns (*intra-city segregation*).

If a jurisdiction has a very small population of a racial group, this indicates that segregation between the jurisdiction and the region (*inter-city segregation*) is likely to be an important feature of the jurisdiction's segregation patterns.

In City of San Bruno, the Black/African American group is 1.6 percent of the population - so staff should be aware of this small population size when evaluating dissimilarity index values involving this group.

Table 2 below provides the dissimilarity index values indicating the level of segregation in San Bruno between white residents and residents who are Black, Latinx, or Asian/Pacific Islander. The table also provides the dissimilarity index between white residents and all residents of color in the jurisdiction, and all dissimilarity index values are shown across three time periods (2000, 2010, and 2020).

In San Bruno the highest segregation is between Latinx and white residents (see Table 2). San Bruno's Latinx /white dissimilarity index of 0.362 means that 36.2% of Latinx (or white) residents would need to move to a different neighborhood to create perfect integration between Latinx residents and white residents.

The "Bay Area Average" column in this table provides the average dissimilarity index values for these racial group pairings across Bay Area jurisdictions in 2020. The data in this column can be used as a comparison to provide context for the levels of segregation between communities of color are from white residents in this jurisdiction.



For example, Table 2 indicates that the average Latinx/white dissimilarity index for a Bay Area jurisdiction is 0.207, so on average 20.7% of Latinx (or white residents) in a Bay Area jurisdiction would need to move to a different neighborhood within the jurisdiction to create perfect integration between Latinx and white residents in that jurisdiction.

Table 2: Racial Dissimilarity Index Values for Segregation within San Bruno

Race	San Bruno			Bay Area Average
	2000	2010	2020	2020
Asian/Pacific Islander vs. White	0.244	0.252	0.229	0.185
Black/African American vs. White	0.279*	0.252*	0.269*	0.244
Latinx vs. White	0.378	0.383	0.362	0.207
People of Color vs. White	0.259	0.262	0.241	0.168

Universe: Population.

Source: IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002. Data from 2010 is from U.S. Census Bureau, Census 2010, Table P4. Data for 2000 is standardized to 2010 census tract geographies and is from U.S. Census Bureau, Census 2000, Table P004.

Note: If a number is marked with an asterisk (*), it indicates that the index is based on a racial group making up less than 5 percent of the jurisdiction population, leading to unreliable numbers.

Figure 3 below shows how dissimilarity index values in City of San Bruno compare to values in other Bay Area jurisdictions. In this chart, each dot represents a Bay Area jurisdiction. For each racial group pairing, the spread of dots represents the range of dissimilarity index values among Bay Area jurisdictions. Additionally, the black line within each racial group pairing notes the dissimilarity index value in San Bruno, and each dashed red line represents the Bay Area average for the dissimilarity index for that pairing. Similar to Figure 2, local staff can use this chart to contextualize how segregation levels between white residents and communities of color in their jurisdiction compare to the rest of the region. However, staff should be mindful of whether a racial group in their jurisdiction has a small population (approximately less than 5% of the jurisdiction's population), as the dissimilarity index value is less reliable for small populations.

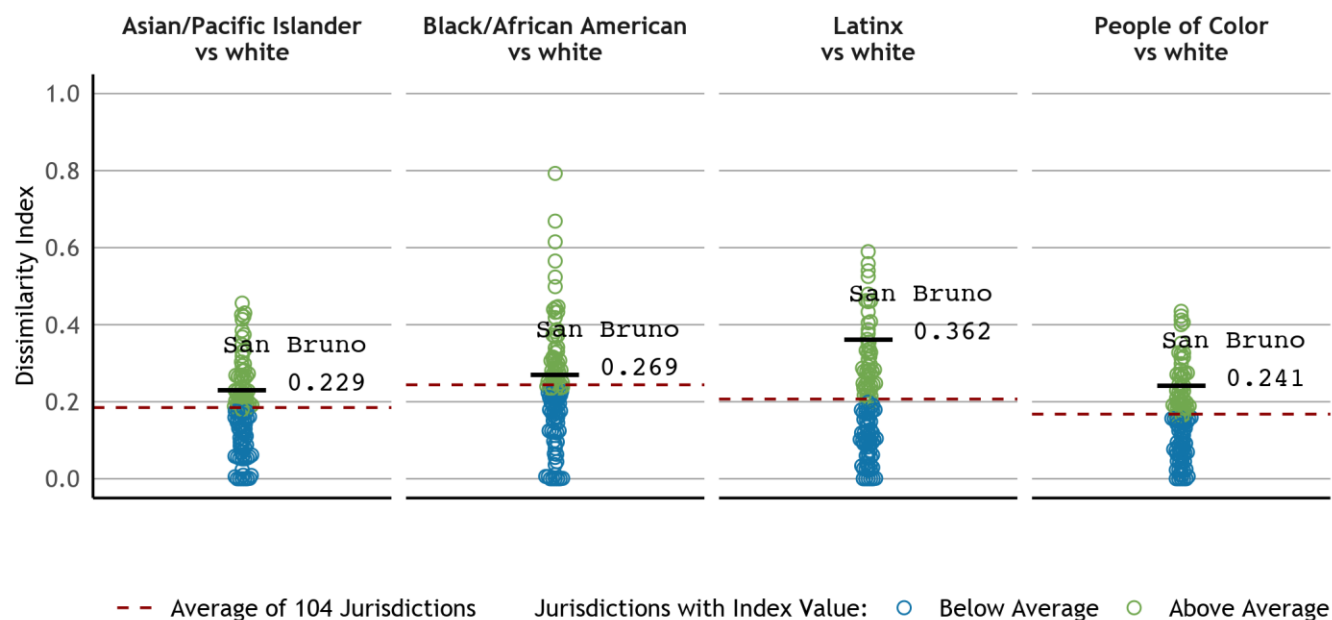


Figure 3: Racial Dissimilarity Index Values for San Bruno Compared to Other Bay Area Jurisdictions (2020)

Universe: Bay Area Jurisdictions.

Source: IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002.

Note: The analysis conducted for this report suggests that dissimilarity index values are unreliable for a population group if that group represents approximately less than 5% of the jurisdiction's total population. ABAG/MTC recommends that when cities have population groups that are less than 5% of the jurisdiction's population (see Table 4), jurisdiction staff could focus on the isolation index or Thiel's H-Index to gain a more accurate understanding of neighborhood-level racial segregation in their jurisdiction.

The **Theil's H Index** can be used to measure segregation between all groups within a jurisdiction:

- This index measures how diverse each neighborhood is compared to the diversity of the whole city. Neighborhoods are weighted by their size, so that larger neighborhoods play a more significant role in determining the total measure of segregation.
- The index ranges from 0 to 1. A Theil's H Index value of 0 would mean all neighborhoods within a city have the same demographics as the whole city. A value of 1 would mean each group lives exclusively in their own, separate neighborhood.
- For jurisdictions with a high degree of diversity (multiple racial groups comprise more than 10% of the population), Theil's H offers the clearest summary of overall segregation.

The Theil's H Index values for neighborhood racial segregation in San Bruno for the years 2000, 2010, and 2020 can be found in Table 3 below. The "Bay Area Average" column in the table provides the average Theil's H Index across Bay Area jurisdictions in 2020. Between 2010 and 2020, the Theil's H Index for racial segregation in San Bruno declined, suggesting that there is now less neighborhood level racial segregation within the jurisdiction. In 2020, the Theil's H Index for racial segregation in San

Bruno was higher than the average value for Bay Area jurisdictions, indicating that neighborhood level racial segregation in San Bruno is more than in the average Bay Area city.

Table 3: Theil's H Index Values for Racial Segregation within San Bruno

	San Bruno			Bay Area Average
Index	2000	2010	2020	2020
Theil's H Multi-racial	0.063	0.065	0.054	0.042

Universe: Population.

Source: IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002. Data from 2010 is from U.S. Census Bureau, Census 2010, Table P4. Data for 2000 is standardized to 2010 census tract geographies and is from U.S. Census Bureau, Census 2000, Table P004.

Figure 4 below shows how Theil's H index values for racial segregation in San Bruno compare to values in other Bay Area jurisdictions in 2020. In this chart, each dot represents a Bay Area jurisdiction. Additionally, the black line notes the Theil's H index value for neighborhood racial segregation in San Bruno, and the dashed red line represents the average Theil's H index value across Bay Area jurisdictions. Local staff can use this chart to compare how neighborhood racial segregation levels in their jurisdiction compare to other jurisdictions in the region.

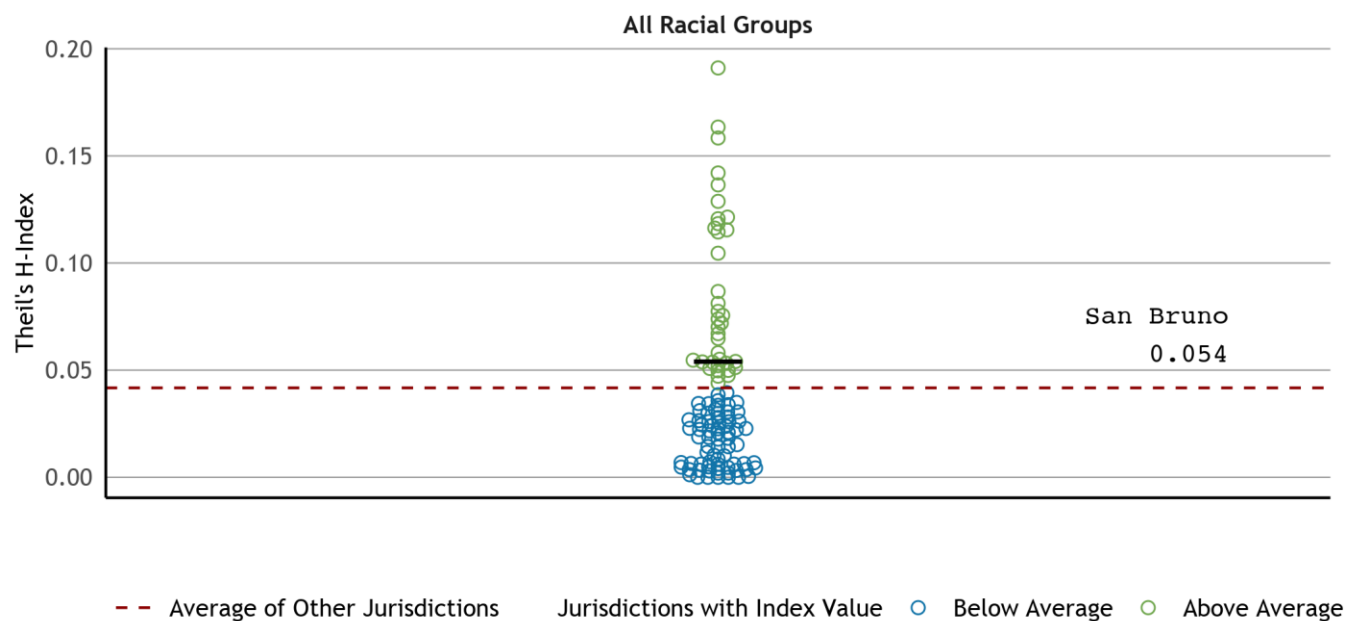


Figure 4: Theil's H Index Values for Racial Segregation in San Bruno Compared to Other Bay Area Jurisdictions (2020)

Universe: Bay Area Jurisdictions.

Source: IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002.

2.2 Regional Racial Segregation (*between* San Bruno and other jurisdictions)

At the regional level, segregation is measured between *cities* instead of between *neighborhoods*. Racial dot maps are not only useful for examining neighborhood racial segregation within a jurisdiction, but these maps can also be used to explore the racial demographic differences between different jurisdictions in the region. Figure 5 below presents a racial dot map showing the spatial distribution of racial groups in San Bruno as well as in nearby Bay Area cities.

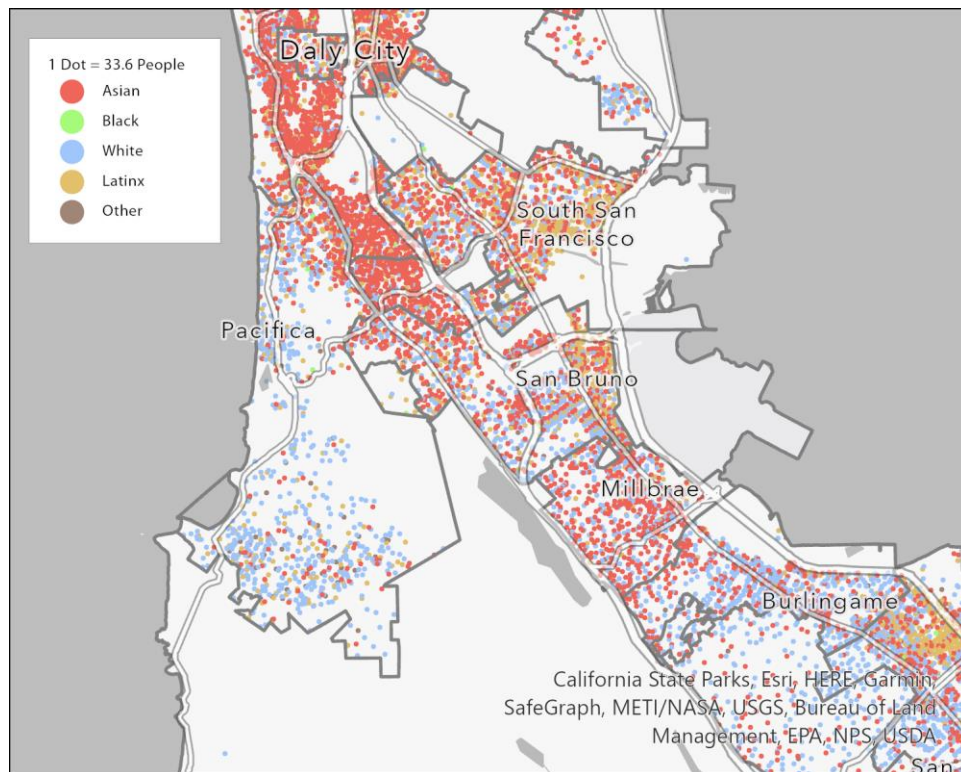


Figure 5: Racial Dot Map of San Bruno and Surrounding Areas (2020)

Universe: Population.

Source: U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002.

Note: The plot shows the racial distribution at the census block level for City of San Bruno and vicinity. Dots in each census block are randomly placed and should not be construed as actual placement of people.

To understand how each city contributes to the total segregation of the Bay Area, one can look at the difference in the racial composition of a jurisdiction compared to the racial composition of the region as a whole. The racial demographics in San Bruno for the years 2000, 2010, and 2020 can be found in Table 4 below. The table also provides the racial composition of the nine-county Bay Area. As of 2020, San Bruno has a lower share of white residents than the Bay Area as a whole, a higher share of Latinx residents, a lower share of Black residents, and a higher share of Asian/Pacific Islander residents.

Table 4: Population by Racial Group, San Bruno and the Region

Race	San Bruno			Bay Area
	2000	2010	2020	2020
Asian/Pacific Islander	18.4%	28.1%	34.3%	28.2%
Black/African American	1.9%	2.0%	1.6%	5.6%
Latinx	24.1%	29.2%	28.0%	24.4%
Other or Multiple Races	8.7%	4.6%	6.6%	5.9%
White	46.9%	36.0%	29.6%	35.8%

Universe: Population.

Source: IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002. Data from 2010 is from U.S. Census Bureau, Census 2010, Table P4. Data for 2000 is standardized to 2010 census tract geographies and is from U.S. Census Bureau, Census 2000, Table P004.

Figure 6 below compares the racial demographics in San Bruno to those of all 109 Bay Area jurisdictions.¹¹ In this chart, each dot represents a Bay Area jurisdiction. For each racial group, the spread of dots represents the range of that group's representation among Bay Area jurisdictions. Additionally, the black line within each racial group notes the percentage of the population of City of San Bruno represented by that group and how that percentage ranks among all 109 jurisdictions. Local staff can use this chart to compare the representation of different racial groups in their jurisdiction to those groups' representation in other jurisdictions in the region, which can indicate the extent of segregation between this jurisdiction and the region.

¹¹ While comparisons of segregation measures are made only using the 104 jurisdictions with more than one census tract, this comparison of jurisdiction level demographic data can be made using all 109 jurisdictions.

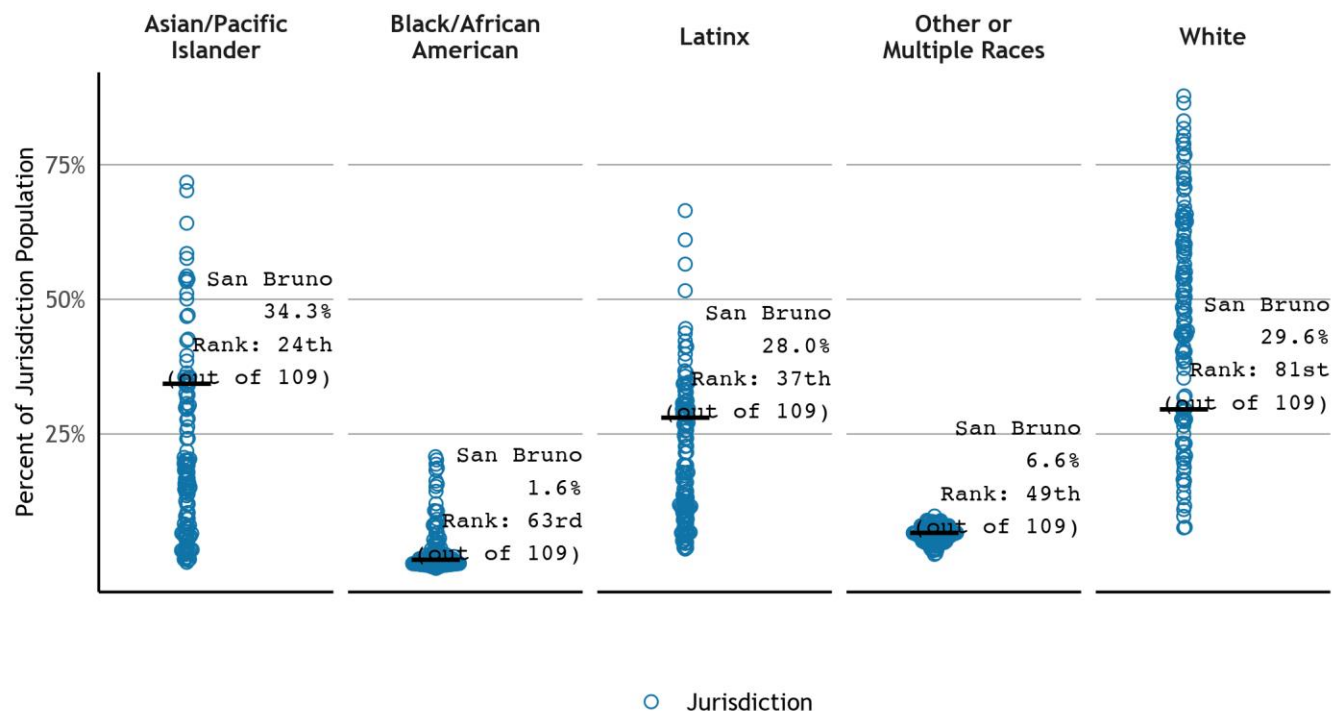


Figure 6: Racial Demographics of San Bruno Compared to All Bay Area Jurisdictions (2020)

Universe: Bay Area Jurisdictions.

Source U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002.

The map in Figure 7 below also illustrates regional racial segregation between San Bruno and other jurisdictions. This map demonstrates how the percentage of people of color in San Bruno and surrounding jurisdictions compares to the Bay Area as a whole:

- Jurisdictions shaded orange have a share of people of color that is less than the Bay Area as a whole, and the degree of difference is greater than five percentage points.
- Jurisdictions shaded white have a share of people of color comparable to the regional percentage of people of color (within five percentage points).
- Jurisdictions shaded grey have a share of people of color that is more than five percentage points greater than the regional percentage of people of color.

diverse each Bay Area jurisdiction is compared to the racial diversity of the whole region. A Theil's H Index value of 0 would mean all *jurisdictions* within the Bay Area have the same racial demographics as the entire region, while a value of 1 would mean each racial group lives exclusively in their own separate jurisdiction. The regional Theil's H index value for racial segregation decreased slightly between 2010 and 2020, meaning that racial groups in the Bay Area are now slightly less separated by the borders between jurisdictions.

Table 5: Regional Racial Segregation Measures

Index	Group	2010	2020
Isolation Index Regional Level	Asian/Pacific Islander	0.317	0.378
	Black/African American	0.144	0.118
	Latinx	0.283	0.291
	White	0.496	0.429
	People of Color	0.629	0.682
Dissimilarity Index Regional Level	Asian/Pacific Islander vs. White	0.384	0.369
	Black/African American vs. White	0.475	0.459
	Latinx vs. White	0.301	0.297
	People of Color vs. White	0.296	0.293
Theil's H Multi-racial	All Racial Groups	0.103	0.097

Universe: Population.

Source: IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002. Data from 2010 is from U.S. Census Bureau, 2010 Census of Population and Housing, Table P4.

3 INCOME SEGREGATION IN CITY OF SAN BRUNO

Definition of Terms - Income Groups

When analyzing segregation by income, this report uses income group designations consistent with the Regional Housing Needs Allocation and the Housing Element:

Very low-income: individuals earning less than 50% of Area Median Income (AMI)

Low-income: individuals earning 50%-80% of AMI

Moderate-income: individuals earning 80%-120% of AMI

Above moderate-income: individuals earning 120% or more of AMI

Additionally, this report uses the term "lower-income" to refer to all people who earn less than 80% of AMI, which includes both low-income and very low-income individuals.

The income groups described above are based on U.S. Department of Housing and Urban Development (HUD) calculations for AMI. HUD calculates the AMI for different metropolitan areas, and the nine county Bay Area includes the following metropolitan areas: Napa Metro Area (Napa County), Oakland-Fremont Metro Area (Alameda and Contra Costa Counties), San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties), San Jose-Sunnyvale-Santa Clara Metro Area (Santa Clara County), Santa Rosa Metro Area (Sonoma County), and Vallejo-Fairfield Metro Area (Solano County).

The income categories used in this report are based on the AMI for the HUD metro area where this jurisdiction is located.

3.1 Neighborhood Level Income Segregation (*within San Bruno*)

Income segregation can be measured using similar indices as racial segregation. Income dot maps, similar to the racial dot maps shown in Figures 1 and 5, are useful for visualizing segregation between multiple income groups at the same time. The income dot map of San Bruno in Figure 8 below offers a visual representation of the spatial distribution of income groups within the jurisdiction. As with the racial dot maps, when the dots show lack of a pattern or clustering, income segregation measures tend to be lower, and conversely, when clusters are apparent, the segregation measures may be higher as well.



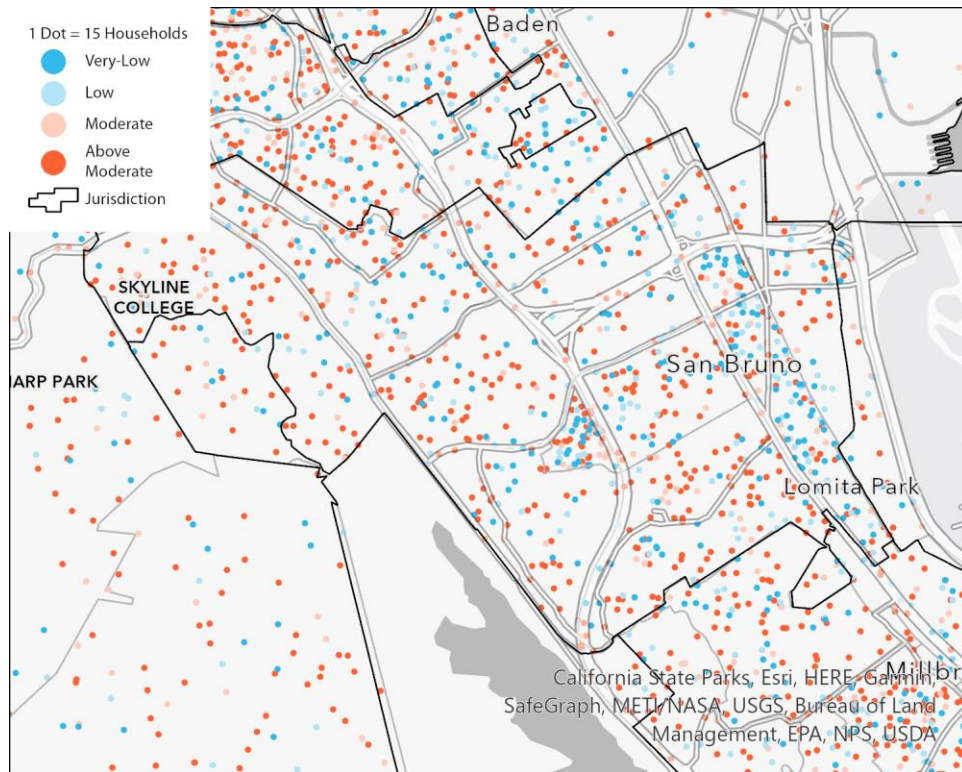


Figure 8: Income Dot Map of San Bruno (2015)

Universe: Population.

Source: U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data.

Note: The plot shows the income group distribution at the census block group level for City of San Bruno and vicinity. Dots in each block group are randomly placed and should not be construed as actual placement of individuals.

The isolation index values for all income groups in San Bruno for the years 2010 and 2015 can be found in Table 6 below.¹³ Above Moderate-income residents are the most isolated income group in San Bruno. San Bruno’s isolation index of 0.296 for these residents means that the average Above Moderate-income resident in San Bruno lives in a neighborhood that is 29.6% Above Moderate-income. Among all income groups, the Above Moderate-income population’s isolation index has changed the most over time, becoming less segregated from other income groups between 2010 and 2015.

Similar to the tables presented earlier for neighborhood racial segregation, the “Bay Area Average” column in Table 6 provides the average isolation index value across Bay Area jurisdictions for different income groups in 2015. The data in this column can be used as a comparison to provide context for the levels of segregation experienced by income groups in this jurisdiction. For example, Table 6 indicates the average isolation index value for very low-income residents across Bay Area jurisdictions is 0.269,

¹³ This report presents data for income segregation for the years 2010 and 2015, which is different than the time periods used for racial segregation. This deviation stems from the [data source recommended for income segregation calculations](#) in HCD’s AFFH Guidelines. This data source most recently updated with data from the 2011-2015 American Community Survey 5-year estimates. For more information on HCD’s recommendations for calculating income segregation, see [page 32 of HCD’s AFFH Guidelines](#).

meaning that in the average Bay Area jurisdiction a very low-income resident lives in a neighborhood that is 26.9% very low-income.

Table 6: Income Group Isolation Index Values for Segregation within San Bruno

	San Bruno		Bay Area Average
Income Group	2010	2015	2015
Very Low-Income (<50% AMI)	0.302	0.281	0.269
Low-Income (50%-80% AMI)	0.269	0.266	0.145
Moderate-Income (80%-120% AMI)	0.246	0.248	0.183
Above Moderate-Income (>120% AMI)	0.356	0.296	0.507

Universe: Population.

Source: Data for 2015 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data. Data for 2010 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2006-2010 Low- and Moderate-Income Summary Data.

Figure 9 below shows how income group isolation index values in San Bruno compare to values in other Bay Area jurisdictions. In this chart, each dot represents a Bay Area jurisdiction. For each income group, the spread of dots represents the range of isolation index values among Bay Area jurisdictions. Additionally, the black line within each income group notes the isolation index value for that group in San Bruno, and each dashed red line represents the Bay Area average for the isolation index for that group. Local staff can use this chart to contextualize how segregation levels for income groups in their jurisdiction compare to the rest of the region.



Figure 9: Income Group Isolation Index Values for San Bruno Compared to Other Bay Area Jurisdictions (2015)

Universe: Bay Area Jurisdictions.

Source: U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data.

Table 7 below provides the dissimilarity index values indicating the level of segregation in San Bruno between residents who are lower-income (earning less than 80% of AMI) and those who are not lower-income (earning above 80% of AMI). This data aligns with the requirements described in HCD's AFFH Guidance Memo for identifying dissimilarity for lower-income households.¹⁴ Segregation in San Bruno between lower-income residents and residents who are not lower-income decreased between 2010 and 2015. Additionally, Table 7 shows dissimilarity index values for the level of segregation in Albany between residents who are very low-income (earning less than 50% of AMI) and those who are above moderate-income (earning above 120% of AMI). This supplementary data point provides additional nuance to an analysis of income segregation, as this index value indicates the extent to which a jurisdiction's lowest and highest income residents live in separate neighborhoods.

Similar to other tables in this report, the "Bay Area Average" column shows the average dissimilarity index values for these income group pairings across Bay Area jurisdictions in 2015. For example, Table 7 indicates that the average dissimilarity index between lower-income residents and other residents in a Bay Area jurisdiction is 0.198, so on average 19.8% of lower-income residents in a Bay Area jurisdiction would need to move to a different neighborhood within the jurisdiction to create perfect income group integration in that jurisdiction.

¹⁴ For more information, see page 32 of HCD's AFFH Guidance Memo.

In 2015, the income segregation in San Bruno between lower-income residents and other residents was higher than the average value for Bay Area jurisdictions (See Table 7). This means that the lower-income residents are more segregated from other residents within San Bruno compared to other Jurisdictions in the region.

Table 7: Income Group Dissimilarity Index Values for Segregation within San Bruno

Income Group	San Bruno		Bay Area Average
	2010	2015	2015
Below 80% AMI vs. Above 80% AMI	0.327	0.225	0.198
Below 50% AMI vs. Above 120% AMI	0.436	0.289	0.253

Universe: Population.

Source: Data for 2015 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data. Data for 2010 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2006-2010 Low- and Moderate-Income Summary Data.

Figure 10 below shows how dissimilarity index values for income segregation in San Bruno compare to values in other Bay Area jurisdictions. In this chart, each dot represents a Bay Area jurisdiction. For each income group pairing, the spread of dots represents the range of dissimilarity index values among Bay Area jurisdictions. Additionally, the black line within each income group pairing notes the dissimilarity index value in San Bruno, and each dashed red line represents the Bay Area average for the dissimilarity index for that pairing. Local staff can use this chart to contextualize how segregation levels between lower-income residents and wealthier residents in their jurisdiction compared to the rest of the region.

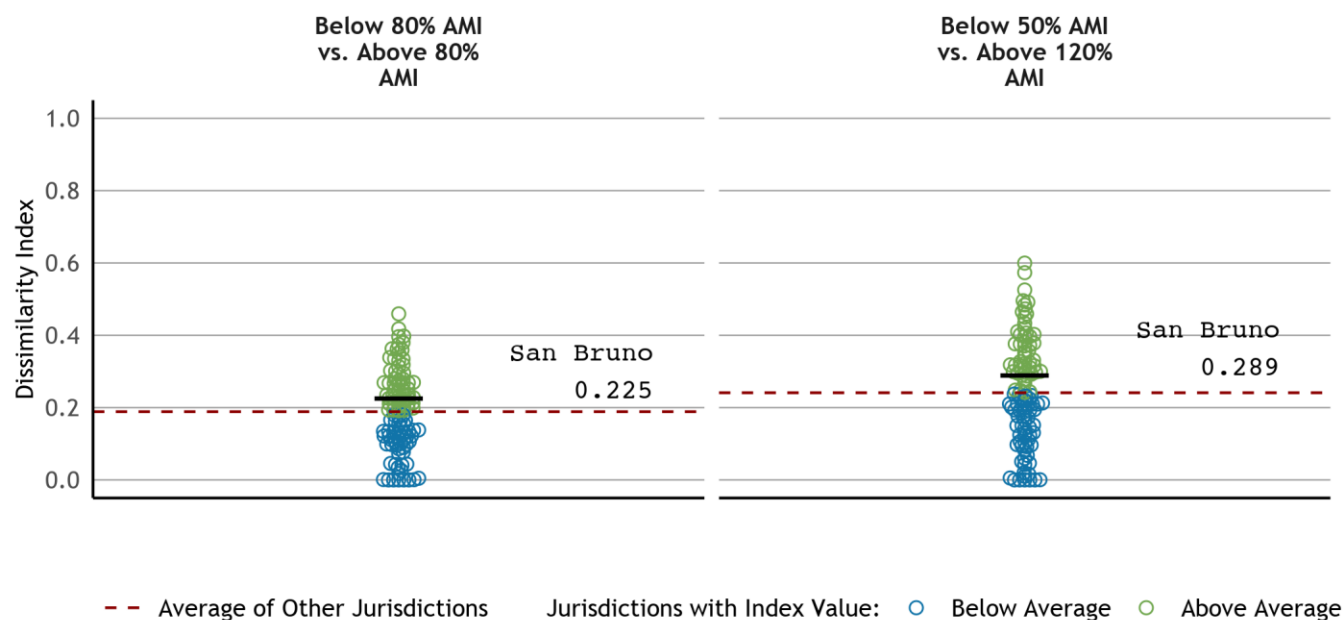


Figure 10: Income Group Dissimilarity Index Values for San Bruno Compared to Other Bay Area Jurisdictions (2015)

Universe: Bay Area Jurisdictions.

Source: U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data.

The Theil's H Index values for neighborhood income group segregation in San Bruno for the years 2010 and 2015 can be found in Table 8 below. The "Bay Area Average" column in this table provides the average Theil's H Index value across Bay Area jurisdictions for different income groups in 2015. By 2015, the Theil's H Index value for income segregation in San Bruno was less than it had been in 2010. In 2015, the Theil's H Index value for income group segregation in San Bruno was lower than the average value for Bay Area jurisdictions, indicating there is less neighborhood level income segregation in San Bruno than in the average Bay Area city.

Table 8: Theil's H Index Values for Income Segregation within San Bruno

	San Bruno		Bay Area Average
Index	2010	2015	2015
Theil's H Multi-income	0.067	0.035	0.043

Universe: Population.

Source: Data for 2015 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data. Data for 2010 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2006-2010 Low- and Moderate-Income Summary Data.

Figure 11 below shows how Theil's H index values for income group segregation in San Bruno compare to values in other Bay Area jurisdictions in 2015. In this chart, each dot represents a Bay Area jurisdiction. Additionally, the black line notes the Theil's H index value for income group segregation in San Bruno, and the dashed red line represents the average Theil's H index value across Bay Area jurisdictions. Local staff can use this chart to compare how neighborhood income group segregation levels in their jurisdiction compare to other jurisdictions in the region.

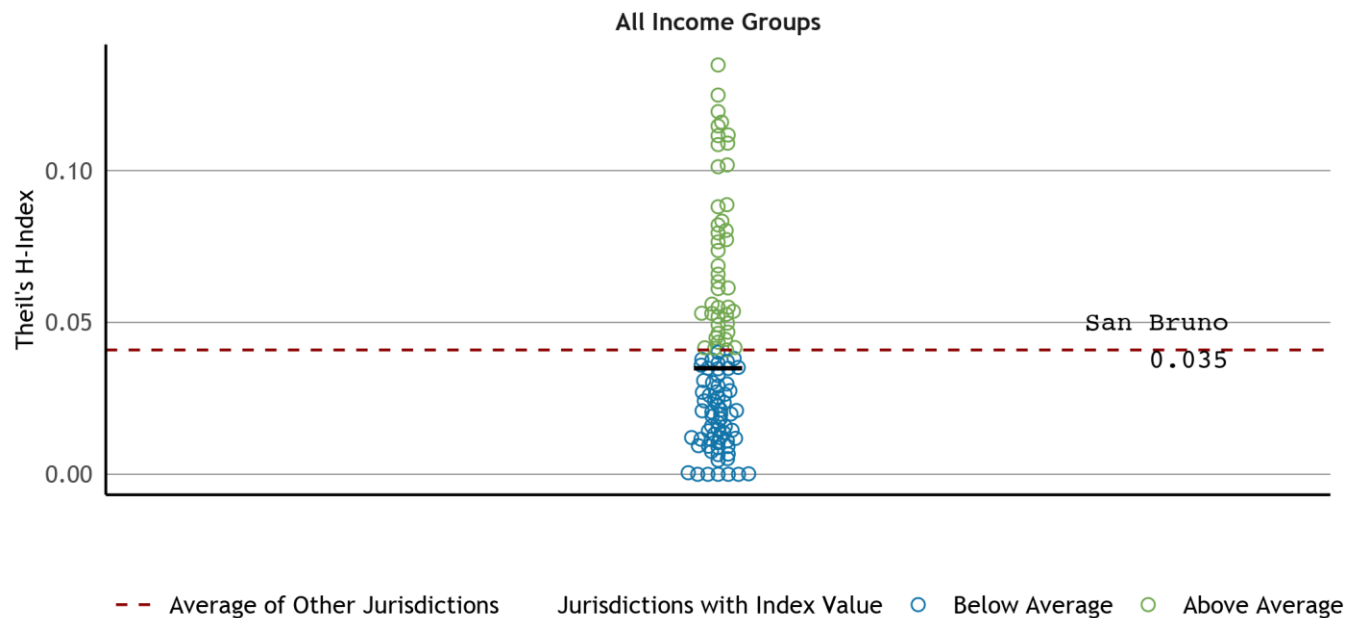


Figure 11: Income Group Theil's H Index Values for San Bruno Compared to Other Bay Area Jurisdictions (2015)

Universe: Bay Area Jurisdictions.

Source: U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data.

3.2 Regional Income Segregation (*between* San Bruno and other jurisdictions)

At the regional level, segregation is measured between jurisdictions instead of between neighborhoods. Income dot maps are not only useful for examining neighborhood income segregation within a jurisdiction, but these maps can also be used to explore income demographic differences between jurisdictions in the region. Figure 12 below presents an income dot map showing the spatial distribution of income groups in San Bruno as well as in nearby Bay Area jurisdictions.

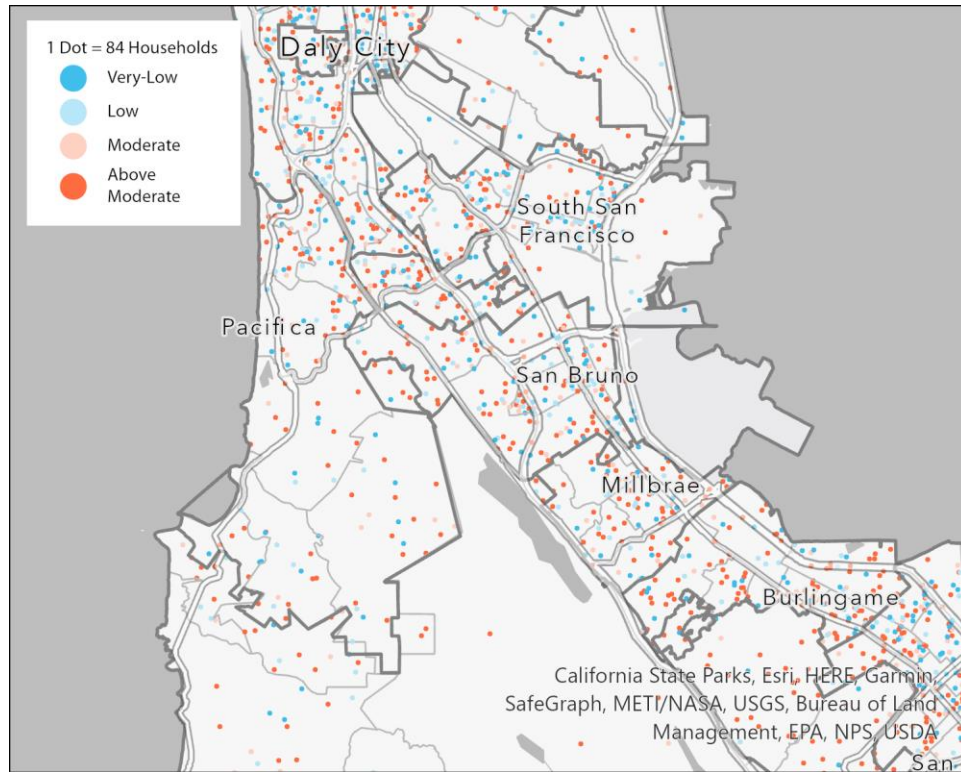


Figure 12: Income Dot Map of San Bruno and Surrounding Areas (2015)

Universe: Population.

Source: U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data.

Note: The plot shows the income group distribution at the census block group level for City of San Bruno and vicinity. Dots in each block group are randomly placed and should not be construed as actual placement of individuals.

When looking at income segregation between jurisdictions in the Bay Area, one can examine how San Bruno differs from the region. The income demographics in San Bruno for the years 2010 and 2015 can be found in Table 9 below. The table also provides the income composition of the nine-county Bay Area in 2015. As of that year, San Bruno had a lower share of very low-income residents than the Bay Area as a whole, a higher share of low-income residents, a higher share of moderate-income residents, and a lower share of above moderate-income residents.

Table 9: Population by Income Group, San Bruno and the Region

	San Bruno		Bay Area
Income Group	2010	2015	2015
Very Low-Income (<50% AMI)	25.12%	26.55%	28.7%
Low-Income (50%-80% AMI)	23.68%	24.57%	14.3%
Moderate-Income (80%-120% AMI)	23.36%	23.56%	17.6%
Above Moderate-Income (>120% AMI)	27.84%	25.32%	39.4%



ASSOCIATION OF BAY AREA GOVERNMENTS
METROPOLITAN TRANSPORTATION COMMISSION



Technical Assistance
for Local Planning
HOUSING

Universe: Population.

Source: Data for 2015 is from Housing U.S. Department of and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data. Data for 2010 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2006-2010 Low- and Moderate-Income Summary Data.

Figure 13 below compares the income demographics in San Bruno to other Bay Area jurisdictions.¹⁵ Like the chart in Figure 3, each dot represents a Bay Area jurisdiction. For each income group, the spread of dots represents the range of that group's representation among Bay Area jurisdictions. The smallest range is among jurisdictions' moderate-income populations, while Bay Area jurisdictions vary the most in the share of their population that is above moderate-income. Additionally, the black lines within each income group note the percentage of San Bruno population represented by that group and how that percentage ranks among other jurisdictions. Local staff can use this chart to compare the representation of different income groups in their jurisdiction to those groups' representation in other jurisdictions in the region, which can indicate the extent of segregation between this jurisdiction and the region.

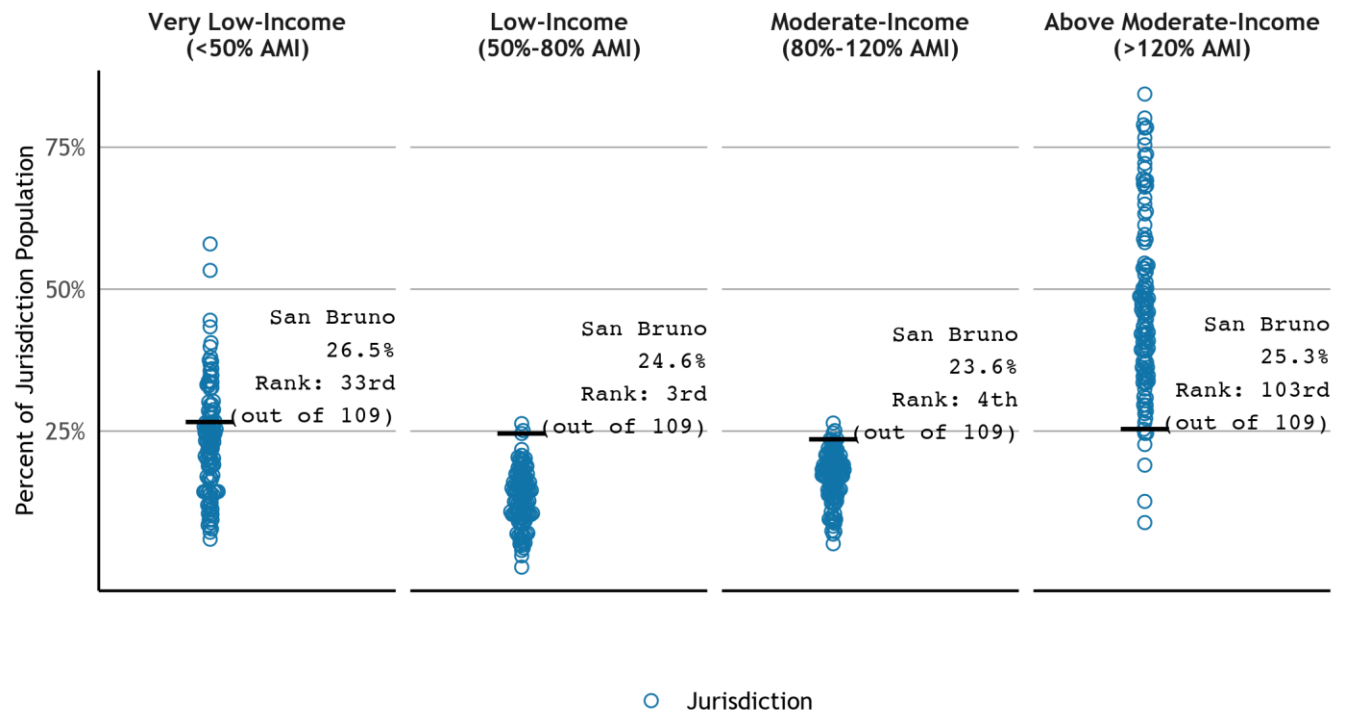


Figure 13: Income Demographics of San Bruno Compared to Other Bay Area Jurisdictions (2015)

Universe: Bay Area Jurisdictions.

Source: U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data.

¹⁵ While comparisons of segregation measures are made only using the 104 jurisdictions with more than one census tract, this comparison of jurisdiction level demographic data can be made using all 109 jurisdictions.

Income segregation between jurisdictions in the region can also be analyzed by calculating regional values for the segregation indices discussed previously. Similar to the regional racial segregation measures shown in Table 5, Table 10 presents dissimilarity index, isolation index, and Theil's H index values for income segregation for the entire nine-county Bay Area in 2010 and 2015. In the previous section of this report focused on neighborhood level income segregation, segregation indices were calculated by comparing the income demographics of the census tracts within a jurisdiction to the demographics of the jurisdiction as a whole. In Table 10, these measures are calculated by comparing the income demographics of local jurisdictions to the region's income group makeup. For example, looking at 2015 data, Table 10 shows the regional isolation index value for very low-income residents is 0.315 for 2015, meaning that on average very low-income Bay Area residents live in a jurisdiction that is 31.5% very low-income. The regional dissimilarity index for lower-income residents and other residents is 0.194 in 2015, which means that across the region 19.4% of lower-income residents would need to move to a different jurisdiction to create perfect income group integration in the Bay Area as a whole. The regional value for the Theil's H index measures how diverse each Bay Area jurisdiction is compared to the income group diversity of the whole region. A Theil's H Index value of 0 would mean all jurisdictions within the Bay Area have the same income demographics as the entire region, while a value of 1 would mean each income group lives exclusively in their own separate jurisdiction. The regional Theil's H index value for income segregation decreased slightly between 2010 and 2015, meaning that income groups in the Bay Area are now slightly less separated by the borders between jurisdictions.

Table 10: Regional Income Segregation Measures

Index	Group	2010	2015
Isolation Index Regional Level	Very Low-Income (<50% AMI)	0.277	0.315
	Low-Income (50%-80% AMI)	0.157	0.154
	Moderate-Income (80%-120% AMI)	0.185	0.180
	Above Moderate-Income (>120% AMI)	0.467	0.435
Dissimilarity Index Regional Level	Below 80% AMI vs. Above 80% AMI	0.186	0.194
	Below 50% AMI vs. Above 120% AMI	0.238	0.248
Theil's H Multi-income	All Income Groups	0.034	0.032

Universe: Population.

Source: Data for 2015 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data. Data for 2010 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2006-2010 Low- and Moderate-Income Summary Data.

4 APPENDIX 1: SUMMARY OF FINDINGS

4.1 Segregation in City of San Bruno

- The isolation index measures the segregation of a single group, and the dissimilarity index measures segregation between two different groups. The Theil's H-Index can be used to measure segregation between all racial or income groups across the city at once.
- As of 2020, Asian residents are the most segregated compared to other racial groups in San Bruno, as measured by the isolation index. Asian residents live in neighborhoods where they are less likely to come into contact with other racial groups.
- Among all racial groups, the white population's isolation index value has changed the most over time, becoming less segregated from other racial groups between 2000 and 2020.
- According to the dissimilarity index, within San Bruno the highest level of racial segregation is between Latinx and white residents.¹⁶
- According to the Theil's H-Index, neighborhood racial segregation in San Bruno declined between 2010 and 2020. Neighborhood income segregation declined between 2010 and 2015.
- Above Moderate-income residents are the most segregated compared to other income groups in San Bruno. Above Moderate-income residents live in neighborhoods where they are less likely to encounter residents of other income groups.
- Among all income groups, the Above Moderate-income population's segregation measure has changed the most over time, becoming less segregated from other income groups between 2010 and 2015.
- According to the dissimilarity index, segregation between lower-income residents and residents who are not lower-income has decreased between 2010 and 2015. In 2015, the income segregation in San Bruno between lower-income residents and other residents was higher than the average value for Bay Area jurisdictions.

4.2 Segregation Between City of San Bruno and Other jurisdictions in the Bay Area Region

- San Bruno has a lower share of white residents than other jurisdictions in the Bay Area as a whole, a higher share of Latinx residents, a lower share of Black residents, and a higher share of Asian/Pacific Islander residents.

¹⁶ The analysis conducted for this report suggests that dissimilarity index values are unreliable for a population group if that group represents approximately less than 5% of the jurisdiction's total population. ABAG/MTC recommends that when cities have population groups that are less than 5% of the jurisdiction's population (see Table 15 in Appendix 2), jurisdiction staff could focus on the isolation index or Thiel's H-Index to gain a more accurate understanding of neighborhood-level racial segregation in their jurisdiction.



- Regarding income groups, San Bruno has a lower share of very low-income residents than other jurisdictions in the Bay Area as a whole, a higher share of low-income residents, a higher share of moderate-income residents, and a lower share of above moderate-income residents.



5 APPENDIX 2: SEGREGATION DATA

Appendix 2 combines tabular data presented throughout this report into a more condensed format. This data compilation is intended to enable local jurisdiction staff and their consultants to easily reference this data and re-use the data in the Housing Element or other relevant documents/analyses.

Table 11 in this appendix combines data from Table 1, Table 2, and Table 3 in the body of the report. Table 12 in this appendix combines data from Table 6, Table 7, and Table 8 in the body of the report. Table 13 represents a duplication of Table 5 in the body of the report; Table 14 represents a duplication of Table 10 in the body of the report; Table 15 in this appendix represents a duplication of Table 4 in the body of the report, while Table 16 represents a duplication of Table 9 in the body of the report.

Table 11: Neighborhood Racial Segregation Levels in San Bruno

Index	Race	San Bruno			Bay Area Average
		2000	2010	2020	2020
Isolation	Asian/Pacific Islander	0.239	0.315	0.369	0.245
	Black/African American	0.025	0.024	0.019	0.053
	Latinx	0.322	0.378	0.355	0.251
	White	0.518	0.414	0.340	0.491
Dissimilarity	Asian/Pacific Islander vs. White	0.244	0.252	0.229	0.185
	Black/African American vs. White	0.279*	0.252*	0.269*	0.244
	Latinx vs. White	0.378	0.383	0.362	0.207
	People of Color vs. White	0.259	0.262	0.241	0.168
Theil's H Multi-racial	All	0.063	0.065	0.054	0.042

Universe: Population.

Source: IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002. Data from 2010 is from U.S. Census Bureau, 2010 Census of Population and Housing, Table P4. Data for 2000 is standardized to 2010 census tract geographies and is from U.S. Census Bureau, Census 2000, Table P004.

Note: If a number is marked with an asterisk (*), it indicates that the index is based on a racial group making up less than 5 percent of the jurisdiction population, leading to unreliable numbers.



Table 12: Neighborhood Income Segregation Levels in San Bruno

		San Bruno		Bay Area Average
Index	Income Group	2010	2015	2015
Isolation	Very Low-Income (<50% AMI)	0.302	0.281	0.269
	Low-Income (50%-80% AMI)	0.269	0.266	0.145
	Moderate-Income (80%-120% AMI)	0.246	0.248	0.183
	Above Moderate-Income (>120% AMI)	0.356	0.296	0.507
Dissimilarity	Below 80% AMI vs. Above 80% AMI	0.327	0.225	0.198
	Below 50% AMI vs. Above 120% AMI	0.436	0.289	0.253
Theil's H Multi-racial	All	0.067	0.035	0.043

Universe: Population.

Source: Income data for 2015 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data. Data for 2010 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2006-2010 Low- and Moderate-Income Summary Data.



ASSOCIATION OF BAY AREA GOVERNMENTS
METROPOLITAN TRANSPORTATION COMMISSION



Technical Assistance
for Local Planning
HOUSING

Table 13: Regional Racial Segregation Measures

Index	Group	2010	2020
Isolation Index Regional Level	Asian/Pacific Islander	0.317	0.378
	Black/African American	0.144	0.118
	Latinx	0.283	0.291
	White	0.496	0.429
	People of Color	0.629	0.682
Dissimilarity Index Regional Level	Asian/Pacific Islander vs. White	0.384	0.369
	Black/African American vs. White	0.475	0.459
	Latinx vs. White	0.301	0.297
	People of Color vs. White	0.296	0.293
Theil's H Multi-racial	All Racial Groups	0.103	0.097

Universe: Population.

Source: IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002. Data from 2010 is from U.S. Census Bureau, 2010 Census of Population and Housing, Table P4.

Table 14: Regional Income Segregation Measures

Index	Group	2010	2015
Isolation Index Regional Level	Very Low-Income (<50% AMI)	0.277	0.315
	Low-Income (50%-80% AMI)	0.157	0.154
	Moderate-Income (80%-120% AMI)	0.185	0.180
	Above Moderate-Income (>120% AMI)	0.467	0.435
Dissimilarity Index Regional Level	Below 80% AMI vs. Above 80% AMI	0.186	0.194
	Below 50% AMI vs. Above 120% AMI	0.238	0.248
Theil's H Multi-income	All Income Groups	0.034	0.032

Universe: Population.

Source: Data for 2015 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data. Data for 2010 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2006-2010 Low- and Moderate-Income Summary Data.



ASSOCIATION OF BAY AREA GOVERNMENTS
METROPOLITAN TRANSPORTATION COMMISSION



Technical Assistance
for Local Planning
HOUSING

Table 15: Population by Racial Group, San Bruno and the Region

	San Bruno			Bay Area
Race	2000	2010	2020	2020
Asian/Pacific Islander	18.41%	28.14%	34.28%	35.8%
Black/African American	1.87%	2.05%	1.59%	5.6%
Latinx	24.12%	29.23%	27.97%	28.2%
Other or Multiple Races	8.74%	4.64%	6.59%	24.4%
White	46.86%	35.95%	29.57%	5.9%

Universe: Population.

Source: IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002. Data from 2010 is from U.S. Census Bureau, 2010 Census of Population and Housing, Table P4. Data for 2000 is standardized to 2010 census tract geographies and is from U.S. Census Bureau, Census 2000, Table P004.

Table 16: Population by Income Group, San Bruno and the Region

	San Bruno		Bay Area
Income Group	2010	2015	2015
Very Low-Income (<50% AMI)	25.12%	26.55%	28.7%
Low-Income (50%-80% AMI)	23.68%	24.57%	14.3%
Moderate-Income (80%-120% AMI)	23.36%	23.56%	17.6%
Above Moderate-Income (>120% AMI)	27.84%	25.32%	39.4%

Universe: Population.

Source: Data for 2015 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data. Data for 2010 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2006-2010 Low- and Moderate-Income Summary Data.



6 REFERENCES

- Ananat, Elizabeth Oltmans. 2011. "The wrong side(s) of the tracks: The causal effects of racial segregation on urban poverty and inequality," *American Economic Journal: Applied Economics* 3: 34-66.
- Bayer, Patrick, Robert McMillan, and Kim S. Rueben. 2004. "What Drives Racial Segregation? New Evidence using Census Microdata," *Journal of Urban Economics* 56(3): 514-535.
- Burch, Traci. 2014. "The Old Jim Crow: Racial Residential Segregation and Imprisonment," *Law and Policy* 36(3): 223-255.
- Chetty, Raj and Nathaniel Hendren. 2018. "The Impacts of Neighborhoods on Intergenerational Mobility I: Childhood Exposure Effects," *The Quarterly Journal of Economics* 133(3):1107-1162
- Cutler, David M., and Edward L. Glaeser. 1997. "Are ghettos good or bad?," *The Quarterly Journal of Economics* 112(3): 827-72.
- Lens, Michael and Paavo Monkkonen. 2016. "Do Strict Land Use Regulations Make Metropolitan Areas More Segregated by Income?," *Journal of the American Planning Association* 82(1): 6-21.
- Pendall, Rolf. 2000. "Local Land-Use Regulation and the Chain of Exclusion," *Journal of the American Planning Association* 66(2): 125-142.
- Rothstein, Richard. 2017. *The Color of Law: A Forgotten History of how our Government Segregated America*. New York: Liveright Publishing.
- Sampson, Robert J. 2012. *Great American city: Chicago and the enduring neighborhood effect*. Chicago: University of Chicago Press.
- Sharkey, Patrick. 2013. *Stuck in place: Urban neighborhoods and the end of progress toward racial equality*. Chicago: University of Chicago Press.
- Trounstone, Jessica. 2015. "Segregation and Inequality in Public Goods," *American Journal of Political Science* 60(3): 709-725.
- Trounstone, Jessica. 2018. *Segregation by Design: Local Politics and Inequality in American Cities*. New York: Cambridge University Press.

Appendix F

AFFH Resident Survey Analysis

This section reports the findings from the resident survey conducted of San Mateo County residents to support the AFFH analysis of Housing Elements. It explores residents' housing, affordability, and neighborhood challenges and experiences with displacement and housing discrimination. The survey also asks about residents' access to economic opportunity, captured through residents' reported challenges with transportation, employment, and K-12 education. The survey was offered in both English and Spanish.

The resident survey was available online, in both Spanish and English, in a format accessible to screen readers, and promoted through jurisdictional communications and social media and through partner networks. A total of 2,382 residents participated.

The survey instrument included questions about residents' current housing situation, housing, neighborhood and affordability challenges, healthy neighborhood indicators, access to opportunity, and experience with displacement and housing discrimination.

Explanation of terms. Throughout this section, several terms are used that require explanation.

- "Precariously housed" includes residents who are currently homeless or living in transitional or temporary/emergency housing, as well as residents who live with friends or family but are not themselves on the lease or property title. These residents may (or may not) make financial contributions to pay housing costs or contribute to the household in exchange for housing (e.g., childcare, healthcare services).
- "Disability" indicates that the respondent or a member of the respondent's household has a disability of some type—physical, mental, intellectual, developmental.
- "Single parent" are respondents living with their children only or with their children and other adults but not a spouse/partner.
- "Tenure" in the housing industry means rentership or ownership.
- "Large households" are considered those with five or more persons residing in a respective household.
- "Seriously Looked for Housing" includes touring or searching for homes or apartments, putting in applications or pursuing mortgage financing.

Sampling note. The survey respondents do not represent a random sample of the county or jurisdictions' population. A true random sample is a sample in which each individual in the population has an equal chance of being selected for the survey. The self-selected nature of the survey prevents the collection of a true random sample. Important insights and themes can still be gained from the survey results, however, with an understanding of the differences among resident groups and between jurisdictions and the county overall. Overall, the data provide a rich source of information about the county's households and their experience with housing choice and access to opportunity in the communities where they live.

Jurisdiction-level data are reported for cities with 50 responses or more. Response by jurisdiction and demographics are shown in the figure below. Overall, the survey received a very strong response from typically underrepresented residents including: people of color, renters, precariously housed residents, very low income households, households with children, large households, single parents, and residents with disabilities.

Figure 1.
Resident Survey Sample Sizes by Jurisdictions and Selected Characteristics

	County	Belmont	Brisbane	Burlingame	Daly City	East Palo Alto	Foster City	Half Moon Bay	Hillsborough	Milbrae	Pacifica	Redwood City	San Bruno	San Mateo	South San Francisco
Total Responses	2,382	89	82	173	130	53	148	63	59	55	84	163	99	175	832
Race/Ethnicity															
African American	134	5	7	4	9	8	10	6	4	4	5	14	4	17	15
Hispanic	397	7	9	14	26	27	13	8	1	8	12	59	13	31	149
Asian	500	18	9	26	43	6	32	6	8	13	14	11	19	23	249
Other Race	149	7	10	6	8	3	14	3	3	3	3	9	7	13	47
Non-Hispanic White	757	41	35	89	27	4	44	27	27	15	35	54	36	58	195
Tenure															
Homeowner	1,088	39	51	96	39	9	89	26	46	18	42	37	48	58	409
Renter	1,029	40	30	65	67	36	43	28	7	33	38	105	41	88	324
Precariously Housed	309	10	8	12	26	12	17	14	5	7	13	23	16	29	87
Income															
Less than \$25,000	282	14	11	12	21	15	12	11	5	6	7	40	11	29	61
\$25,000-\$49,999	265	13	9	10	22	9	8	6	3	6	7	28	5	20	97
\$50,000-\$99,999	517	10	14	38	43	10	26	11	3	10	17	37	22	40	206
Above \$100,000	721	38	24	69	16	8	64	12	30	14	32	31	40	40	251
Household Characteristics															
Children under 18	840	38	24	53	50	26	44	17	18	20	29	61	37	64	287
Large households	284	5	7	11	20	18	8	3	5	7	8	20	13	15	133
Single Parent	240	14	8	15	19	11	12	9	3	7	7	30	9	21	49
Disability	711	28	25	41	38	22	40	22	13	17	29	62	34	65	210
Older Adults (age 65+)	736	25	27	66	37	11	54	25	25	18	33	44	32	37	248

Note: Numbers do not aggregate either due to multiple responses or that respondents chose not to provide a response to all demographic and socioeconomic questions.

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Primary Findings

The survey data present a unique picture of the housing choices, challenges, needs, and access to economic opportunity of San Mateo County residents.

Top level findings from residents' perspectives and experiences:

- The **limited supply of housing** that accommodates voucher holders presents several challenges. Specifically,
 - Eight out of 10 voucher holders represented by the survey find a landlord that accepts a housing voucher to be “difficult” or “very difficult.”
 - According to the survey data, vouchers not being enough to cover the places residents want to live is a top impediment for residents who want to move in San Mateo County, as well as for African American, Asian, and Hispanic residents, households with children under 18, single parents, older adults, households with a member experiencing a disability, and several jurisdictions.
- **Low income is a barrier** to accessing housing. The impacts are highest for precariously housed respondents, large households, Hispanic households, and residents in Daly City and Redwood City.
- **Nearly 4 in 10 respondents who looked for housing experienced denial of housing.** African American/Black respondents, single parent households, precariously housed respondents, and households with income below \$50,000 reported the highest denial rates.
- **1 in 5 residents have been displaced** from their home in the past five years. One of the main reasons cited for displacement was *the rent increased more than I could pay*. African American households, single parents, households that make less than \$25,000, and precariously housed respondents reported the highest rates of displacement.
- For households with children that were displaced in the past five years, **60% of children in those households have changed schools**. The most common outcomes identified by households with children who have changed schools include *school is more challenging, they feel less safe at the new school, and they are in a worse school*.
- **Nearly 1 in 5 residents reported they have experienced discrimination** in the past five years. African American, single parent, and precariously housed respondents reported the highest rates of discrimination. The most common actions

in response to discrimination cited by survey respondents were *Nothing/I wasn't sure what to do* and *Moved/found another place to live*.

- Of respondents reporting a disability, **about 25% report that their current housing situation does not meet their accessibility needs**. The three top greatest housing needs identified by respondents included installation of grab bars in bathroom or bench in shower, supportive services to help maintain housing, and ramps.
- On average, respondents are **fairly satisfied with their transportation situation**. Groups with the highest proportion of respondents somewhat or not at all satisfied with their transportation options included African American, single parents, precariously housed, and Brisbane respondents.

There are some housing, affordability, and neighborhood challenges unique to specific resident groups. These include:

- **Would like to move but can't afford it**—Most likely to be a challenge for Daly City, East Palo Alto, and Redwood City respondents, as well as Hispanic, renter, precariously housed, households making less than \$50,000, and large household respondents.
- **My house or apartment isn't big enough for my family**—Most likely to be a challenge for East Palo Alto respondents, as well as Hispanic households, large and single parent households, and households with children under 18.
- **I'm often late on my rent payments**—Most likely to be a challenge for East Palo Alto and renter respondents, as well as households that make less than \$25,000.
- **I can't keep up with my utility payments**—Most likely to be a challenge for East Palo Alto, Daly City, and San Mateo respondents, as well as African American and Hispanic respondents, single parent households, households with children under 18, and households that make less than \$50,000.
- **Bus/rail does not go where I need to go or does not operate during the times I need**— Most likely to be a challenge for African American, precariously housed, single parent households, Brisbane and Pacifica respondents.
- **Schools in my neighborhood are poor quality**—Most likely to be a challenge for East Palo Alto, Redwood City, San Bruno and South San Francisco respondents, as well as Hispanic respondents and households with children under 18.

Resident Survey Findings

Of survey respondents who reported their race or ethnicity, nearly 40% of survey respondents identified as non-Hispanic White, followed by Asian (26%), Hispanic (20%), African American (7%), and Other Minority (8%) residents (Figure 2). Overall, 45% of the survey respondents were homeowners, followed by 42% of renter respondents. Thirteen percent of respondents reported they are precariously housed (Figure 3). Four in ten respondents reported having household income greater than \$100,000. Nearly 30% of respondents reported a household income between \$50,000-99,999, followed by 15% of respondents who made between \$25,000-49,999 and 16% of respondents making less than \$25,000 (Figure 4).

The survey analysis also included selected demographic characteristics of respondents, including those with children under the age of 18 residing in their household, adults over the age of 65, respondents whose household includes a member experiencing a disability, those who live in large households, and single parents. Thirty five percent of respondents indicated they had children in their household, while 31% indicated they were older adults. Thirty percent of respondents indicated they or a member of their household experienced a disability, 12% of respondents reported having large households, and 10% were single parents (Figure 5).

Figure 2.
Survey Respondents
by Race/Ethnicity

Note:

n=1,937; 535 respondents did not indicate their race or ethnicity.

Source:

Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

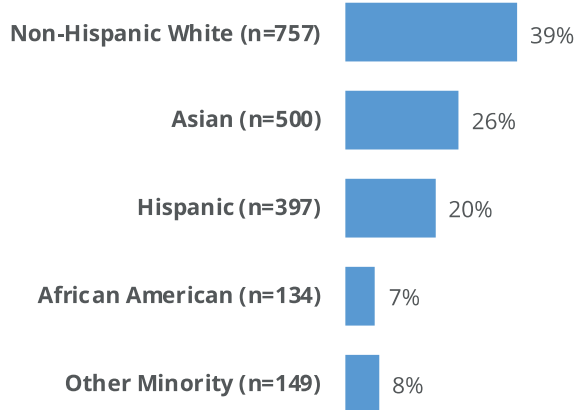


Figure 3.
Survey Respondents
by Tenure

Note:

n=2,426.

Source:

Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

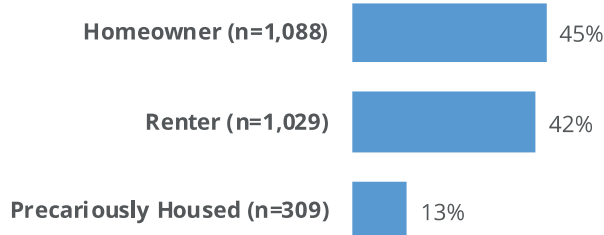


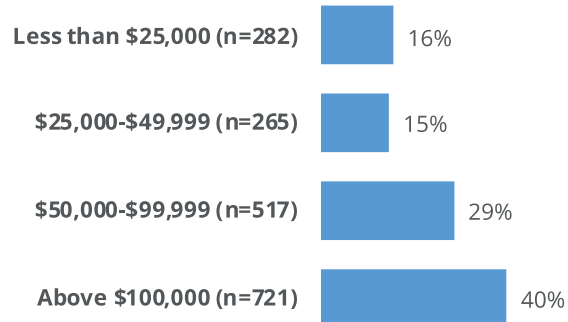
Figure 4.
Survey Respondents
by Income

Note:

n=1,785.

Source:

Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.



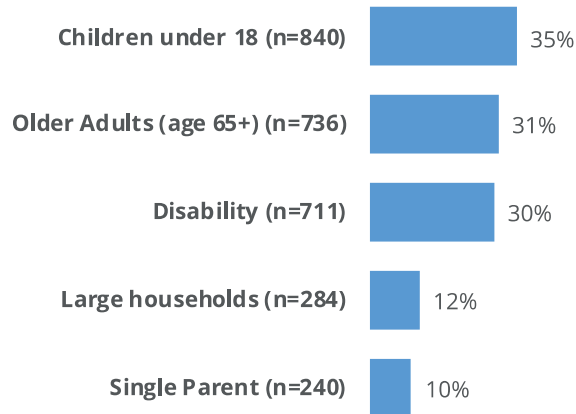
**Figure 5.
Survey Respondents
by Selected
Household
Characteristics**

Note:

Denominator is total responses to the survey (n=2,382)

Source:

Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.



Housing, Neighborhood and Affordability Challenges

Housing challenges: overall. Survey respondents were asked to select the housing challenges they currently experience from a list of 34 different housing, neighborhood, and affordability challenges. Figures 6a through 8c present the top 10 housing and neighborhood challenges and top 5 affordability challenges experienced by jurisdiction, race/ethnicity, tenure, income, and selected household characteristics.

These responses allow a way to compare the jurisdictions to the county for housing challenges for which other types of data do not exist. In this analysis, “above the county”—**shaded in light red or pink**—is defined as the proportion of responses that is 25% higher than the overall county proportion. “Below the county”—**shown in light blue**—occurs when the proportion of responses is 25% lower than the overall county proportion.

As shown in Figure 6a, residents in Redwood City and East Palo Alto experience several housing challenges at a higher rate than the county overall. Conversely, Foster City and Hillsborough residents experience nearly all identified housing challenges at a lower rate than the county.

Notable trends in housing, neighborhood, and affordability challenges by geographic area include:

- Residents in Daly City, East Palo Alto, and Redwood City are less likely to move due to the lack of available affordable housing options.
- East Palo Alto, Redwood City, and San Mateo residents report living in housing that is too small for their families.
- Millbrae, Belmont, and Redwood City residents report being more reticent to request a repair to their unit in fear that their landlord will raise their rent or evict them.
- Nearly 1 in 5 Pacifica survey respondents report that their home or apartment is in bad condition.

- Brisbane and East Palo Alto residents are more likely to experience a landlord refusing to make repairs to their unit.
- Residents in Daly City and Millbrae are more likely to report that they don't feel safe in their neighborhood or building.
- Half Moon Bay and East Palo Alto respondents expressed the greatest need for assistance in taking care of themselves or their home.

When compared to the county overall, **the most common areas where respondents' needs were higher than the county overall** were:

- Overall, half of the jurisdictions' respondents reported *I need help taking care of myself/my home and can't find or afford to hire someone* at a higher rate than the county.
- Over 40% of jurisdictions' respondents reported a higher rate than the county for the following housing challenge: *My home/apartment is in bad condition.*
- Nearly 40% of jurisdictions' respondents reported a higher rate than the county for the following housing challenges: *My landlord refuses to make repairs despite my requests* and *I don't feel safe in my neighborhood/building.*

Figure 6a.
Top 10 Housing Challenges Experienced by Jurisdiction

25% Above County average
25% Below County average

Housing or Neighborhood Condition	County	Belmont	Brisbane	Burlingame	Daly City	East Palo Alto	Foster City	Half Moon Bay	Hillsborough	Milbrae	Pacifica	Redwood City	San Bruno	San Mateo	South San Francisco
Valid cases	2,159	82	73	158	118	49	135	59	50	53	79	151	93	163	738
I would like to move but I can't afford anything that is available/income too low	31%	27%	12%	20%	51%	41%	16%	25%	4%	32%	28%	43%	30%	38%	35%
My house or apartment isn't big enough for my family	20%	22%	11%	14%	24%	35%	10%	12%	4%	21%	11%	26%	20%	26%	21%
I worry that if I request a repair it will result in a rent increase or eviction	14%	21%	10%	13%	17%	14%	9%	10%	2%	23%	15%	20%	11%	15%	13%
My home/apartment is in bad condition	11%	15%	14%	9%	15%	12%	3%	7%	0%	11%	18%	14%	5%	15%	10%
My landlord refuses to make repairs despite my requests	6%	6%	14%	3%	5%	12%	4%	5%	2%	2%	9%	9%	5%	10%	5%
I live too far from family/friends/my community	6%	6%	5%	4%	8%	4%	5%	8%	6%	6%	3%	8%	4%	7%	5%
I don't feel safe in my building/neighborhood	6%	7%	5%	5%	13%	8%	0%	7%	6%	11%	10%	8%	3%	6%	3%
I need help taking care of myself/my home and can't find or afford to hire someone	5%	2%	7%	7%	7%	10%	2%	14%	2%	8%	9%	3%	4%	8%	4%
I have bed bugs/insects or rodent infestation	5%	10%	5%	4%	3%	16%	2%	3%	4%	6%	9%	11%	6%	4%	3%
The HOA in my neighborhood won't let me make changes to my house or property	4%	2%	5%	1%	3%	8%	11%	3%	2%	4%	5%	3%	3%	4%	2%
None of the above	42%	37%	48%	50%	20%	33%	55%	44%	76%	36%	47%	28%	45%	35%	46%

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

The following two figures segment the answers by:

- Housing affordability challenges only; and
- Neighborhood challenges only.

Housing affordability challenges. As shown in Figure 6b, residents in San Mateo, Daly City, East Palo Alto, and Pacifica experience affordability challenges at a higher rate than the county overall. Conversely, Belmont, Hillsborough, Burlingame, and South San Francisco residents experience affordability challenges at a lower rate than the county.

The most significant geographic variations occur in:

- San Mateo city residents experience all five affordability challenges at a greater rate than the county overall. In addition to being less likely to pay utility bills or rent on time, San Mateo residents are more than twice as likely than the average county respondent to have bad credit or a history of eviction/foreclosure that impacts their ability to rent.
- East Palo Alto, San Mateo, and Daly City residents are most likely to experience difficulty paying utility bills.
- Residents in East Palo Alto and Redwood City are most likely to be late on their rent payments.
- Millbrae residents experience the greatest difficulty paying their property taxes among jurisdictions in San Mateo County.
- Respondents from Brisbane, Half Moon Bay, and Pacifica are also more likely to have trouble keeping up with property taxes.
- Daly City, City of San Mateo, and Redwood City respondents are more likely to have bad credit or an eviction history impacting their ability to rent.

Overall, over a third of jurisdictions' respondents experienced the following affordability challenges at a higher rate than the county: *I can't keep up with my property taxes and I have bad credit/history of evictions/foreclosure and cannot find a place to rent.*

.

Figure 6b.
Top 5 Affordability Challenges Experienced by Jurisdiction

25% Above County average
 25% Below County average

Affordability Challenges	County	Belmont	Brisbane	Burlingame	Daly City	East Palo Alto	Foster City	Half Moon Bay	Hillsborough	Milbrae	Pacifica	Redwood City	San Bruno	San Mateo	South San Francisco
Valid cases	2,130	83	73	157	115	51	134	58	50	50	77	147	93	160	728
I can't keep up with my utilities	10%	6%	5%	6%	15%	16%	5%	12%	4%	12%	8%	12%	9%	15%	9%
I'm often late on my rent payments	8%	6%	5%	6%	10%	20%	3%	7%	2%	8%	4%	12%	4%	11%	7%
I can't keep up with my property taxes	6%	2%	10%	4%	3%	2%	8%	10%	0%	16%	10%	3%	5%	9%	5%
I have bad credit/history of evictions/foreclosure and cannot find a place to rent	4%	1%	4%	2%	13%	6%	0%	0%	2%	0%	5%	8%	4%	10%	2%
I have Section 8 and I am worried my landlord will raise my rent higher than my voucher payment	4%	2%	7%	3%	3%	2%	7%	3%	4%	4%	5%	3%	3%	6%	2%
None of the above	73%	73%	68%	80%	65%	59%	78%	66%	88%	64%	71%	70%	77%	63%	80%

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Neighborhood challenges. As shown in Figure 6c, residents in East Palo Alto, Brisbane, Daly City, and Pacifica experience neighborhood challenges at a higher rate than the county. Burlingame and Foster City both experience neighborhood challenges at a lower rate than the county.

Hillsborough and Belmont residents report divergent experiences related to neighborhood challenges — respondents identified more challenges around neighborhood infrastructure and access to transit but fewer challenges around school quality and job opportunities.

There are a handful of jurisdictions who experience specific neighborhood challenges at a disproportionate rate compared to the county.

- For instance, East Palo Alto and Belmont residents experience neighborhood infrastructure issues (e.g., bad sidewalks, no lighting) more acutely than county residents overall.
- Brisbane residents experience transportation challenges in their neighborhoods.
- East Palo Alto, Redwood City, San Bruno, and South San Francisco experience challenges with school quality in their neighborhoods.
- Residents in Brisbane, Hillsborough, Pacifica, Belmont, and Half Moon Bay report the highest rates of difficulty accessing public transit.
- Daly City, Millbrae, San Mateo, and East Palo Alto residents were more likely to identify the lack of job opportunities available in their neighborhoods.

Over a third of jurisdictions' respondents experienced the following neighborhood challenges at a higher rate than the county: *I can't get to public transit/bus/light rail easily or safely.*

Figure 6c.
Top 5 Neighborhood Challenges Experienced by Jurisdiction

		<div><div></div>25% Above County average</div> <div><div></div>25% Below County average</div>														
Neighborhood Challenges	County	Belmont	Brisbane	Burlingame	Daly City	East Palo Alto	Foster City	Half Moon Bay	Hillsborough	Milbrae	Pacifica	Redwood City	San Bruno	San Mateo	South San Francisco	
Valid cases	2,079	80	72	153	116	48	130	56	53	46	75	145	91	151	712	
My neighborhood does not have good sidewalks, walking areas, and/or lighting	17%	<div>31%</div>	18%	13%	<div>25%</div>	<div>40%</div>	<div>4%</div>	18%	<div>23%</div>	20%	15%	21%	14%	<div>12%</div>	16%	
Schools in my neighborhood are poor quality	15%	<div>6%</div>	18%	<div>3%</div>	17%	<div>25%</div>	<div>4%</div>	14%	<div>2%</div>	<div>7%</div>	13%	<div>20%</div>	<div>20%</div>	15%	<div>20%</div>	
Bus/rail does not go where I need to go or does not operate during the times I need	15%	14%	<div>24%</div>	<div>8%</div>	14%	15%	<div>21%</div>	18%	<div>9%</div>	15%	<div>24%</div>	17%	14%	17%	<div>10%</div>	
I can't get to public transit/bus/light rail easily or safely	14%	<div>19%</div>	<div>29%</div>	7%	<div>9%</div>	<div>10%</div>	14%	<div>18%</div>	<div>25%</div>	17%	<div>21%</div>	12%	13%	15%	<div>10%</div>	
There are not enough job opportunities in the area	12%	<div>9%</div>	<div>8%</div>	<div>7%</div>	<div>20%</div>	<div>17%</div>	<div>8%</div>	14%	<div>0%</div>	<div>20%</div>	13%	11%	11%	<div>18%</div>	12%	
None of the above	50%	41%	<div>28%</div>	<div>69%</div>	45%	<div>33%</div>	62%	46%	57%	50%	52%	41%	52%	52%	55%	

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Differences in needs by race and ethnicity and housing tenure. As shown in Figure 7a, and compared to the county overall:

- African American, Hispanic, and Other Race respondents, as well as Renters and those who are precariously housed experience several housing challenges at a higher rate than the county overall.
- Conversely, non-Hispanic White residents and homeowners are less likely to experience housing challenges.

Specifically,

- Black or African American residents are more than three times as likely to have a landlord not make a repair to their unit after a request compared to county residents overall. Renters, Hispanic, Other Race, and Precariously housed residents are also more likely to experience this challenge.
- African American, Asian, Hispanic, Renter, and Precariously Housed households are more likely to experience bed bugs or rodent infestation in their homes.
- African American, Other Race, Renter, and Precariously Housed households are also more likely to live further away from family, friends, and their community.
- African Americans are three times more likely than the average county respondent to be told by their HOA they cannot make changes to their house or property. Asian households are twice as likely to experience this challenge.
- Renter, Hispanic, and Other Race respondents are more likely to worry that if they request a repair it will result in a rent increase or eviction and to report that their homes are in bad condition.

Figure 7a.
Top 10 Housing Challenges Experienced by Race/Ethnicity and Tenure

25% Above County average
 25% Below County average

Housing or Neighborhood Condition	County	African American	Asian	Hispanic	Other Race	Non-Hispanic White	Homeowner	Renter	Precariously Housed
Valid cases	2,159	132	489	392	144	734	986	974	301
I would like to move but I can't afford anything that is available/income too low	31%	30%	32%	50%	31%	20%	7%	48%	56%
My house or apartment isn't big enough for my family	20%	16%	21%	35%	22%	11%	12%	29%	18%
I worry that if I request a repair it will result in a rent increase or eviction	14%	17%	13%	23%	19%	11%	2%	28%	13%
My home/apartment is in bad condition	11%	12%	9%	16%	17%	10%	6%	17%	10%
My landlord refuses to make repairs despite my requests	6%	20%	7%	10%	10%	5%	2%	13%	10%
I live too far from family/ friends/my community	6%	15%	6%	6%	13%	6%	5%	8%	9%
I don't feel safe in my building/ neighborhood	6%	13%	6%	6%	9%	5%	4%	8%	7%
I need help taking care of myself/my home and can't find or afford to hire someone	5%	14%	7%	5%	6%	5%	5%	6%	11%
I have bed bugs/insects or rodent infestation	5%	14%	8%	7%	5%	4%	4%	9%	9%
The HOA in my neighborhood won't let me make changes to my house or property	4%	14%	8%	4%	3%	3%	5%	3%	7%
None of the above	42%	18%	37%	24%	38%	58%	68%	21%	13%

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

The above trends are similar for the **most acute housing affordability challenges**. As shown in Figure 7b, African American and Hispanic households, as well as renters and those precariously housed, experience affordability challenges at a higher rate than the county overall. Non-Hispanic White residents and homeowners experience these same challenges at a lower rate than the county.

- African American residents experience all five affordability challenges at a greater rate than the county overall.
- In addition to being more likely to not pay utility bills or rent on time, African American residents are more than four times as likely than the average county respondent to have a Section 8 voucher and worry that their landlord will raise their rent more than the voucher payment.
- Along with African American residents, Hispanic households, renters, and precariously housed households are most likely to experience difficulty paying utility bills, as well as have bad credit or eviction/foreclosure history impacting their ability to find a place to rent.
- These groups, with the exception of those precariously housed, are also more likely to be late on their rent payments.

Figure 7b.
Top 5 Affordability Challenges Experienced by Race/Ethnicity and Tenure

25% Above County average
 25% Below County average

Affordability Challenges	County	African American	Asian	Hispanic	Other Race	Non-Hispanic White	Homeowner	Renter	Precariously Housed
Valid cases	2,130	132	487	391	146	739	983	953	293
I can't keep up with my utilities	10%	22%	11%	17%	14%	5%	5%	15%	15%
I'm often late on my rent payments	8%	13%	6%	12%	12%	4%	1%	15%	8%
I can't keep up with my property taxes	6%	16%	8%	4%	5%	7%	9%	5%	14%
I have bad credit/history of evictions/foreclosure and cannot find a place to rent	4%	5%	3%	8%	4%	2%	1%	6%	11%
I have Section 8 and I am worried my landlord will raise my rent higher than my voucher payment	4%	18%	5%	6%	7%	2%	2%	7%	8%
None of the above	73%	32%	70%	63%	64%	83%	84%	61%	54%

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

As shown in Figure 7c, African American and precariously housed residents experience neighborhood challenges at a higher rate than the county. These two groups experience neighborhood issues related to transportation more acutely than county residents overall. In addition to Other Race respondents, they are also more likely to identify the lack of job opportunities in their respective neighborhoods.

Additionally, Hispanic residents are more likely to live in neighborhoods with poor performing schools than the average county respondent. Homeowners are also more likely to report that they cannot access public transit easily or safely.

Figure 7c.
Top 5 Neighborhood Challenges Experienced by Race/Ethnicity and Tenure

25% Above County average
 25% Below County average

Neighborhood Challenges	County	African American	Asian	Hispanic	Other Race	Non-Hispanic White	Homeowner	Renter	Precariously Housed
Valid cases	2,079	133	486	389	146	737	975	918	284
My neighborhood does not have good sidewalks, walking areas, and/or lighting	17%	14%	17%	19%	16%	18%	18%	15%	18%
Schools in my neighborhood are poor quality	15%	13%	18%	20%	17%	13%	18%	13%	13%
Bus/rail does not go where I need to go or does not operate during the times I need	15%	33%	16%	13%	17%	17%	17%	14%	24%
I can't get to public transit/bus/light rail easily or safely	14%	24%	15%	11%	16%	16%	18%	11%	19%
There are not enough job opportunities in the area	12%	22%	14%	12%	19%	9%	9%	15%	20%
None of the above	50%	23%	46%	48%	45%	53%	49%	51%	36%

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Differences in needs by household status. As shown in Figure 8a, single parents, households making less than \$50,000, households with children under 18 and households with a member experiencing a disability are more likely to experience housing challenges. Conversely, households making more than \$100,000 experience nearly all specified housing challenges at a lower rate than the county.

Single parents experience all ten housing challenges at a greater rate than the county overall.

Households making less than \$25,000 also experience every challenge at a higher rate, with the exception of *I worry that if I request a repair it will result in a rent increase or eviction*.

Households making less than \$50,000, single parents, and households with children under 18 are more likely to experience the following challenges:

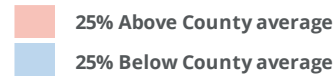
- My house or apartment isn't big enough for my family;
- My house or apartment is in bad condition;
- My landlord refuses to make repairs despite my request;
- I live too far from family/friends/my community;
- I don't feel safe in my building/neighborhood;
- I need help taking care of myself/my home and can't find or afford to hire someone; and
- I have bed bugs/insects or rodent infestation.

Households with a member experiencing a disability are also more likely to experience landlords refusing their requests to make repairs, living further away from family/friends/community, and not being able to find or afford someone to help take care of themselves or their homes. These households are also more likely to experience bed bugs, insects, or rodent infestation, as well as HOA restrictions impacting their ability to make changes to their home or property.

Additionally, large households have the highest proportion of respondents among the selected groups that would like to move but can't afford anything that is available.

Figure 8a.

Top 10 Housing Challenges Experienced by Income and Household Characteristics



Housing or Neighborhood Condition	County	Less than \$25,000	\$25,000-\$49,999	\$50,000-\$99,999	Above \$100,000	Children under 18	Large Households	Single Parent	Disability	Adults (age 65+)
Valid cases	2,159	280	260	505	701	827	278	240	701	709
I would like to move but I can't afford anything that is available/income too low	31%	47%	48%	37%	16%	35%	51%	40%	36%	25%
My house or apartment isn't big enough for my family	20%	25%	25%	23%	16%	34%	43%	32%	20%	13%
I worry that if I request a repair it will result in a rent increase or eviction	14%	16%	18%	19%	9%	19%	19%	28%	16%	11%
My home/apartment is in bad condition	11%	15%	20%	12%	6%	15%	17%	17%	12%	9%
My landlord refuses to make repairs despite my requests	6%	13%	13%	8%	2%	9%	8%	14%	10%	6%
I live too far from family/ friends/my community	6%	9%	9%	6%	5%	10%	5%	10%	8%	6%
I don't feel safe in my building/ neighborhood	6%	9%	9%	6%	3%	8%	4%	10%	7%	5%
I need help taking care of myself/my home and can't find or afford to hire someone	5%	9%	9%	5%	3%	7%	6%	12%	11%	6%
I have bed bugs/insects or rodent infestation	5%	10%	9%	5%	3%	9%	4%	15%	9%	6%
The HOA in my neighborhood won't let me make changes to my house or property	4%	7%	3%	4%	3%	7%	4%	11%	6%	5%
None of the above	42%	21%	21%	37%	61%	28%	26%	12%	32%	49%

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

As shown in Figure 8b, households making less than \$50,000, as well as large households, single parents, households with children under 18, and households with a member experience a disability, experience the most acute affordability challenges at a higher rate than the county overall. Households making more than \$50,000 and adults over the age of 65 are less likely to experience affordability challenges.

Households making between \$25,000-\$50,000, single parents, and households with children under 18 experience all five affordability challenges at a greater rate than the average county respondent.

Of households experiencing major affordability issues, **single parent households are most acutely impacted.** These households are more than three times as likely to have a Section 8 voucher and fear their landlord will raise the rent impacting the viability of their voucher, more than twice as likely to miss utility payments and have bad credit/eviction or foreclosure history impacting their ability to rent, and twice as likely to have trouble keeping up with their property taxes.

Figure 8b.

Top 5 Affordability Challenges Experienced by Income and Household Characteristics

■ 25% Above County average
■ 25% Below County average

Affordability Challenges	County	Less than \$25,000	\$25,000-\$49,999	\$50,000-\$99,999	Above \$100,000	Children under 18	Large Households	Single Parent	Disability	Adults (age 65+)
Valid cases	2,130	276	260	509	703	830	279	239	699	716
I can't keep up with my utilities	10%	16%	16%	12%	3%	16%	14%	23%	15%	8%
I'm often late on my rent payments	8%	19%	16%	6%	1%	11%	12%	15%	11%	4%
I can't keep up with my property taxes	6%	7%	9%	8%	5%	9%	4%	12%	8%	7%
I have bad credit/history of evictions/foreclosure and cannot find a place to rent	4%	8%	7%	4%	1%	5%	6%	10%	6%	3%
I have Section 8 and I am worried my landlord will raise my rent higher than my voucher payment	4%	11%	6%	4%	1%	7%	3%	14%	8%	5%
None of the above	73%	46%	56%	72%	90%	59%	70%	32%	59%	75%

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

As shown in Figure 8c, households with children under 18, as well as single parents, households with a member experiencing a disability, and households making less than \$25,000 are more likely to experience neighborhood challenges. These households are most likely to report that *the bus/rail does not go where I need to go or does not operate during the times I need*. In addition to households that make between \$25,000-\$100,000, these groups are more likely to identify the lack of job opportunities in their respective neighborhoods.

Households with children under 18 are more likely to live in neighborhoods with poor quality schools. Large households are more likely to report issues with neighborhood infrastructure (e.g., bad sidewalks, poor lighting) and households with a member experiencing a disability are more likely to report they cannot access public transit easily or safely.

Figure 8c.

Top 5 Neighborhood Challenges Experienced by Income and Household Characteristics

25% Above County average
25% Below County average

Neighborhood Challenges	County	Less than \$25,000	\$25,000-\$49,999	\$50,000-\$99,999	Above \$100,000	Children under 18	Large Households	Single Parent	Disability	Adults (age 65+)
Valid cases	2,079	273	259	503	709	824	277	234	692	714
My neighborhood does not have good sidewalks, walking areas, and/or lighting	17%	17%	15%	18%	17%	19%	22%	16%	19%	14%
Schools in my neighborhood are poor quality	15%	17%	14%	11%	19%	24%	19%	17%	14%	9%
Bus/rail does not go where I need to go or does not operate during the times I need	15%	19%	16%	15%	16%	19%	11%	28%	19%	16%
I can't get to public transit/bus/light rail easily or safely	14%	15%	12%	14%	14%	15%	12%	15%	19%	17%
There are not enough job opportunities in the area	12%	21%	17%	16%	6%	17%	12%	19%	15%	11%
None of the above	50%	40%	45%	51%	53%	38%	48%	31%	41%	53%

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Experience Finding Housing

This section explores residents' experience seeking a place to rent or buy in the county and the extent to which displacement—having to move when they do not want to move—is prevalent. For those respondents who seriously looked for housing in the past five years, this section also examines the extent to which respondents were denied housing to rent or buy and the reasons why they were denied.

Recent experience seeking housing to rent. Figure 9 presents the proportion of respondents who seriously looked to rent housing for the county, jurisdictions, and selected respondent characteristics, as well as the reasons for denial.

Over half of county respondents (56%) have seriously looked for housing in the past five years. The **most common reasons for denial** included:

- Landlord not returning the respondent's call (26%),
- Landlord told me the unit was available over the phone but when I showed up in person, it was no longer available (22%), and
- Landlord told me it would cost more because of my service or emotional support animal (14%).

Jurisdictions with the highest percentage of respondents who seriously looked for housing include Millbrae (74%), San Mateo (73%), and Redwood City (72%). While all three jurisdictions reported that *landlord not returning the respondent's call* was one of their main reasons for denial, 18% of Redwood City respondents identified *landlord told me they do not accept Section 8 vouchers* as a main reason for denial.

Among respondents by race/ethnicity, 80% of African American respondents reported that they had seriously looked for housing in the past five years while the lowest percentage of respondents who reported seriously looking for housing were non-Hispanic White (46%). The main reasons for denial experienced by African American respondents included *landlord told me the unit was available over the phone but when I showed up in person, it was no longer available* (39%), *landlord told me it would cost more because of my service or emotional support animal* (34%), and *landlord told me I couldn't have a service or emotional support animal* (28%).

Among respondents by tenure, renters (75%) and precariously housed (74%) respondents reported the highest rates of seriously looking for housing.

Among respondents by income, households making less than \$25,000 (71%) had the highest rate. The main reasons for denial reported by these households were *landlord told me I couldn't have a service or emotional support animal* (36%) and *landlord told me it would cost more because of my service or emotional support animal* (30%).

Single parents (79%) and households with children under 18 (66%) also reported the highest percentage of those who seriously looked for housing in the past five years among the selected household characteristics respondent groups. In addition to sharing the top two reasons for denial with the county, 25% of single parent household respondents also reported they were denied housing because the *landlord told me I can't have a service or emotional support animal*.

Figure 9. If you looked seriously for housing to rent in San Mateo County in the past five years, were you ever denied housing?

	Overall Percent Seriously Looked for Housing	Reason for Denial									n
		Landlord did not return calls and/or emails asking about a unit	Landlord said unit was available over phone, but when I showed up in person, it was no longer available	Landlord told me it would cost me more for my service or emotional animal	Landlord told me I can't have a service or emotional support animal	Landlord told me it would cost me more to rent because I have children	Landlord told me they don't rent to families with children	Landlord told me they do not accept Section 8 vouchers	Landlord told me they couldn't make changes to the apartment/ home for my disability	None of the Above	
Jurisdiction											
County	56%	26%	22%	14%						45%	928
Belmont	62%	33%	27%							31%	49
Brisbane	59%		41%			22%				26%	27
Burlingame	48%	19%	23%							54%	57
Daly City	63%	33%	16%			16%				44%	61
East Palo Alto	58%	35%	30%							26%	23
Foster City	50%	12%		16%	14%					55%	51
Half Moon Bay	68%					17%	17%			48%	29
Hillsborough	42%		14%	29%	14%					57%	14
Milbrae	74%	25%	46%							36%	28
Pacifica	51%	16%	26%						16%	55%	31
Redwood City	72%	31%						18%		40%	99
San Bruno	57%			22%		22%				39%	36
San Mateo	73%	30%	34%							39%	98
South San Francisco	47%	24%	13%							56%	248
Race/Ethnicity											
African American	80%		39%	34%	28%					15%	101
Asian	56%	19%	29%							40%	199
Hispanic	63%	32%	22%							41%	230
Other Race	70%	29%	22%							45%	91
Non-Hispanic White	46%	29%	20%							48%	263
Tenure											
Homeowner	36%		25%						15%	54%	183
Renter	75%	29%	22%							43%	641
Precariously Housed	74%	23%	32%							26%	188
Income											
Less than \$25,000	71%			30%	36%					29%	182
\$25,000-\$49,999	60%	39%	32%							27%	149
\$50,000-\$99,999	58%	24%		20%						45%	251
Above \$100,000	48%	19%	14%							64%	216
Household Characteristics											
Children under 18	66%	30%	29%							33%	447
Large Households	60%	33%	19%			18%				44%	139
Single Parent	79%	25%	35%		25%					19%	173
Disability	63%	24%	24%							34%	386
Older Adults (age 65+)	48%	20%	29%							39%	282

Note: The "Percent Seriously Looked for Housing" column includes all respondents, not just those who indicated they rent.

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Recent experience seeking housing to buy. Figure 10 presents the proportion of respondents who seriously looked to buy housing in the county, by jurisdiction, and selected respondent characteristics, as well as the reasons for denial. As noted above, 56% of county respondents have seriously looked for housing in the past five years.

The most common reasons for denial included:

- Real estate agent told me I would need to show I was prequalified with a bank (29%) and
- A bank would not give me a loan to buy a home (23%).

For the jurisdictions with the highest percentage of respondents who seriously looked for housing (Millbrae, San Mateo and Redwood City), all three cities shared the same top two reasons for denial as the county. Additionally, 21% of Millbrae respondents reported that *the real estate agent would not make a disability accommodation when I asked*.

For African American respondents who looked to buy housing in the last five years, the most common reason for denial was *the real estate agent would not make a disability accommodation when I asked* (47%). African Americans, along with Other Races, also most commonly reported that they needed a loan prequalification before real estate agents would work with them. While between 43-54% of respondents from other racial/ethnic groups reported they did not experience any reason for denial when seriously looking to buy housing over the past five years, 12% of African American respondents reported similarly.

Among respondents by income, the main reasons for denial for households making less than \$25,000 were *the real estate agent told me I would need to show I was prequalified with a bank* (32%) and *real estate agent only showed me or only suggested homes in neighborhoods where most people were of my same race or ethnicity* (26%).

Among the selected housing characteristics category, single parent households and households with children under 18 reported shared the same top two reasons for denial as the county. Additionally, 36% of single parent household respondents reported that *the real estate agent would not make a disability accommodation when I asked*, as well as 25% of respondents over the age of 65.

Residents in Redwood City, Millbrae, and South San Francisco, as well as large households, also reported that *a bank or other lender charged me a high interest rate on my home loan* as a reason for denial.

Figure 10. If you looked seriously for housing to buy in San Mateo County in the past five years, were you ever denied housing?

	Percent Seriously Looked for Housing	Reason for Denial						n
		The real estate agent told me I would need to show I was prequalified with a bank	A bank or other lender would not give me a loan to buy a home	The real estate agent would not make a disability accommodation when I asked	Only showed homes in neighborhoods where most people were same race/ethnicity	A bank or other lender charged me a high interest rate on my home loan	None of the Above	
Jurisdiction								
County	56%	29%	23%				50%	870
Belmont	62%	21%			15%		35%	48
Brisbane	59%	36%			30%		42%	33
Burlingame	48%	22%	14%				61%	51
Daly City	63%	19%	27%				56%	52
East Palo Alto	58%	24%	33%				48%	21
Foster City	50%	25%	20%				49%	51
Half Moon Bay	68%	35%	23%	23%			50%	26
Hillsborough	42%	18%		23%			59%	22
Milbrae	74%	25%	29%	21%		21%	54%	28
Pacifica	51%	35%	35%				42%	31
Redwood City	72%	30%	22%			27%	50%	64
San Bruno	57%	14%	21%				62%	42
San Mateo	73%	40%	32%				38%	82
South San Francisco	47%	26%	18%			16%	57%	251
Race/Ethnicity								
African American	80%	40%	38%	47%			12%	89
Asian	56%	30%	25%				43%	223
Hispanic	63%	29%	28%				49%	174
Other Race	70%	36%	21%			21%	50%	90
Non-Hispanic White	46%	29%	23%				54%	250
Tenure								
Homeowner	36%	29%	17%				54%	332
Renter	75%	32%	27%				46%	467
Precariously Housed	74%	36%	36%	30%			30%	154
Income								
Less than \$25,000	71%	32%	25%		26%		41%	131
\$25,000-\$49,999	60%	42%	40%				29%	106
\$50,000-\$99,999	58%	35%	30%				38%	216
Above \$100,000	48%	22%	13%			10%	64%	296
Household Characteristics								
Children under 18	66%	33%	28%				40%	443
Large Households	60%	33%	25%			25%	49%	126
Single Parent	79%	38%	43%	36%			24%	143
Disability	63%	35%	26%				38%	330
Older Adults (age 65+)	48%	35%	29%	25%			38%	252

Note: The "Percent Seriously Looked for Housing" column includes all respondents, not just those who indicated they buy.

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Denied housing to rent or buy. Figure 11 presents the proportion of those who looked and were denied housing to rent or buy for the county, jurisdictions, and selected respondent characteristics, as well as reason for denial. As shown, nearly 4 in 10 county respondents who looked for housing experienced denial of housing. African American/Black respondents, precariously housed respondents, households with income below \$50,000, and single parent respondents have denial rates of 60% or higher. African American (79%) and single parent (74%) respondents report the highest rates of denial.

Among the reasons for denial:

- ***Income too low was a major reason for denial for all groups*** except homeowners and households with incomes above \$100,000. Additionally, all jurisdictions report this as a common reason for being denied housing with the exception of Foster City, Hillsborough, and San Bruno.
- *Haven't established a credit history or no credit history* was also a common reason of denial for most groups. The impacts are higher for Asian, Hispanic and African American households, along with renter and precariously housed respondents, households with income below \$50,000, and single parent households, households with children under 18, households with a member experiencing a disability, and several jurisdictions.
- Another top denial reason among certain groups is the *landlord didn't accept the type of income I earn (social security or disability benefit or child support)*. **Source of income was the most common reason for denial among African American households** (28%). Other groups with denial rates of 25% or higher for this specific issue include precariously housed respondents, single parent households, and households with a member experiencing a disability, as well as Foster City and San Bruno residents.
- *Bad credit* is another barrier for accessing housing, particularly for Hispanic and Other Race households, households with income between \$50,000-\$100,000, and large households. This also impacts East Palo Alto, San Mateo, Daly City, Redwood City, Burlingame, and South San Francisco residents at a higher rate.

Figure 11. If you looked seriously for housing to rent or buy in San Mateo County in the past five years, were you ever denied housing?

			Reason for Denial												
			Bad Credit	Eviction history	Income too low	Too many people in my household	Other renter/ applicant willing to pay more for rent	Haven't established a credit history/no credit history	Don't have a regular/ steady job/ consistent work history	Landlord didn't accept the type of income I earn (social security or disability)	Lack of stable housing record	Real or perceived sexual orientation or gender identity	I had/ have COVID	Foreclosure	n
Percent Denied Housing	Total n														
Jurisdiction															
County	39%	1154	18%		44%		19%	21%							449
Belmont	52%	50			38%		27%	27%							26
Brisbane	42%	38			25%			19%				31%			16
Burlingame	30%	71	24%		29%										21
Daly City	49%	73	28%		53%		28%		19%						36
East Palo Alto	55%	29	38%		44%			25%							16
Foster City	30%	63							25%	40%	30%				19
Half Moon Bay	41%	34			29%			29%							14
Hillsborough	23%	22										40%			5
Milbrae	36%	33			67%	25%		33%					25%		12
Pacifica	38%	39			47%			27%	33%						15
Redwood City	41%	105	28%		63%	26%		26%							43
San Bruno	25%	51		31%						31%	38%				13
San Mateo	48%	112	30%		38%						28%				53
South San Francisco	30%	331	19%		58%		28%			17%					98
Race/Ethnicity															
African American	79%	107		25%	25%			25%		28%		27%			85
Asian	42%	281			38%			28%		21%		21%			117
Hispanic	49%	253	28%		60%		26%	26%							125
Other Race	43%	105	22%		49%		24%								45
Non-Hispanic White	31%	351			40%			19%	23%		25%				108
Tenure															
Homeowner	26%	348								24%	22%	23%			91
Renter	45%	687			48%		20%	24%							310
Precariously Housed	61%	208			42%			22%		25%					126
Income															
Less than \$25,000	64%	199			47%			31%	29%						127
\$25,000-\$49,999	65%	158			48%			21%		20%	20%				103
\$50,000-\$99,999	38%	302	21%		51%	24%									114
Above \$100,000	18%	346				27%	16%			20%				16%	64
Household Characteristics															
Children under 18	51%	558			42%			26%		19%					283
Large Households	43%	171	27%		64%	41%									74
Single Parent	74%	189			41%			27%		25%					138
Disability	54%	446			39%			21%		25%					239
Older Adults (age 65+)	44%	350			35%					22%		21%			153

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Experience using housing vouchers. It is “difficult” or “very difficult” for eight out of 10 voucher holders to find a landlord that accepts a housing voucher (Figure 13).

As shown in Figure 12, this is related to the amount of the voucher and current rents and the lack of supply (inability to find a unit in the allotted amount of time). Over half of voucher holders (53%) who experienced difficulty indicated the *voucher is not enough to cover the rent for places I want to live* and almost half of voucher holders (49%) who experienced difficulty indicated there is *not enough time to find a place to live before the voucher expires*.

Other significant difficulties using vouchers identified by respondents included *landlords have policies of not renting to voucher holders* (46%) and *can't find information about landlords that accept Section 8* (36%).

Among respondents by race/ethnicity, African American respondents had the greatest proportion of those with a housing choice voucher (60%). Of those respondents, 76% found it difficult to find a landlord that accepts a housing voucher. While 13% of Hispanic respondents have a housing voucher, 85% have found it difficult to use the voucher. Fourteen percent of Asian respondents have housing vouchers—nearly three quarters of these respondents reported that the *voucher is not enough to cover the rent for the places I want to live*.

Other groups of respondents with higher proportions of voucher utilization include single parent households (43%), precariously housed respondents (30%), and households with income below \$25,000 (29%). For each of the aforementioned groups, more than 75% of their respective respondents reported difficulty in utilizing the housing choice voucher. The *voucher is not enough to cover the rent for places I want to live* was one of the main reasons cited for not using the voucher.

Figure 12.
Why is it difficult to
use a housing
voucher?

Source:
Root Policy Research from the 2021-
2022 21 Elements AFFH Resident
Survey.

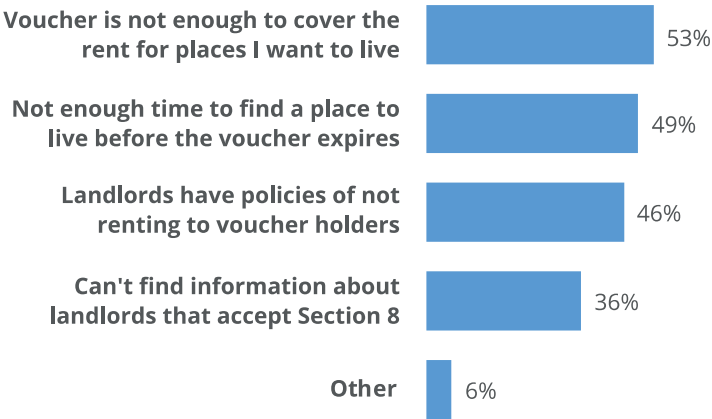


Figure 13. How difficult is it to find a landlord that accepts a housing voucher?

	Percent with a Housing Voucher	Not difficult	Somewhat difficult	Very difficult	n	Voucher is not enough to cover the rent for places I want to live	Not enough time to find a place to live before the voucher expires	Landlords have policies of not renting to voucher holders	Can't find information about landlords that accept Section 8	Other	n
Jurisdiction											
County	12%	18%	55%	27%	250	53%	49%	46%	36%	6%	203
Belmont	16%	14%	64%	21%	81	45%	64%	36%	27%	9%	11
Brisbane	22%	20%	73%	7%	15	50%	50%	42%	33%	0%	12
Burlingame	8%	0%	75%	25%	12	50%	50%	25%	8%	0%	12
Daly City	12%	14%	50%	36%	14	83%	25%	42%	17%	25%	12
East Palo Alto	14%	29%	57%	14%	7	20%	20%	40%	60%	0%	5
Foster City	12%	18%	47%	35%	17	47%	40%	27%	33%	7%	15
Half Moon Bay	19%	22%	56%	22%	9	71%	29%	29%	43%	14%	7
Hillsborough	8%	25%	75%	0%	4	67%	67%	33%	0%	0%	3
Milbrae	22%	50%	20%	30%	10	60%	40%	20%	40%	0%	5
Pacifica	11%	13%	50%	38%	8	86%	43%	43%	43%	0%	7
Redwood City	16%	13%	61%	26%	23	40%	50%	70%	45%	5%	20
San Bruno	12%	9%	64%	27%	11	40%	60%	50%	10%	10%	10
San Mateo	24%	24%	50%	26%	38	43%	54%	43%	39%	7%	28
South San Francisco	4%	11%	33%	56%	27	63%	50%	71%	63%	8%	24
Race/Ethnicity											
African American	60%	24%	60%	16%	82	55%	52%	40%	31%	6%	62
Asian	14%	23%	63%	14%	71	73%	44%	31%	31%	0%	55
Hispanic	13%	15%	40%	45%	53	58%	42%	51%	49%	11%	45
Other Race	19%	29%	50%	21%	28	55%	45%	65%	35%	5%	20
Non-Hispanic White	8%	14%	61%	25%	64	43%	61%	57%	38%	4%	56
Tenure											
Homeowner	8%	23%	59%	18%	78	58%	49%	42%	31%	0%	59
Renter	18%	19%	52%	30%	165	55%	52%	48%	43%	6%	134
Precariously Housed	30%	14%	66%	20%	86	57%	54%	35%	26%	7%	74
Income											
Less than \$25,000	29%	17%	58%	25%	84	47%	41%	47%	37%	10%	70
\$25,000-\$49,999	18%	17%	52%	31%	48	63%	55%	63%	40%	5%	40
\$50,000-\$99,999	12%	23%	52%	26%	62	55%	55%	51%	37%	2%	49
Above \$100,000	5%	20%	57%	23%	35	43%	61%	29%	32%	4%	28
Household Characteristics											
Children under 18	21%	20%	60%	20%	179	59%	51%	44%	35%	1%	143
Large Households	7%	20%	45%	35%	20	63%	56%	63%	56%	6%	16
Single Parent	43%	17%	58%	24%	103	62%	52%	38%	33%	2%	85
Disability	22%	18%	58%	24%	158	57%	52%	42%	29%	5%	129
Older Adults (age 65+)	17%	18%	63%	19%	123	56%	53%	44%	34%	3%	102

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Displacement. Figure 14 presents the proportion of residents who experienced displacement in the past five years, as well as the reason for displacement.

- Overall, 21% of survey respondents experienced displacement in the past five years. Among all survey respondents, the **main reason for displacement was rent increased more than I could pay** (29%).
- Respondents who are precariously housed have higher rates of recent displacement than homeowners or renters; this suggests that when displaced a unit these housing-insecure tenants are more likely to couch surf or experience homelessness for some period of time before securing a new place to live.
- Among respondents by race/ethnicity, **African American respondents reported the highest rate of displacement** (59%). The primary reason reported by African American respondents for their displacement was *housing was unsafe (e.g., domestic assault, harassment)*. Twenty eight percent also reported that they were *forced out for no reason*.
- Asian households, as well as homeowners, households that make less than \$25,000, single parent households, households that include a member experiencing a disability, and Millbrae, Brisbane and Pacifica residents are also more likely than other respondents to have been displaced due to an unsafe housing situation (e.g., domestic assault, harassment).
- Additionally, Asian, precariously housed respondents, households making less than \$25,000, single parent households, and Hillsborough residents are more likely than other respondents to have been displaced and not given a reason.

For respondents that had experienced displacements, they were asked to identify which city they moved from and which city they moved to. **The most common moves to and from cities included:**

-
-
- Moved within South San Francisco (28 respondents)
- Moved from outside San Mateo County to San Mateo (10 respondents)
- Moved from San Bruno to South San Francisco (9 respondents)
- Moved from Daly City to South San Francisco (9 respondents)
- Moved within Burlingame (8 respondents)

Figure 14. Displacement Experience and Reasons for Displacement

			Reason for Displacement														
			Rent increased more than I could pay	Personal/ relationship reasons	Landlord was selling the home/ apartment	Landlord wanted to move back in/move in family	Landlord wanted to rent to someone else	Landlord refused to renew my lease	Housing was unsafe (e.g., domestic assault, harassment)	Forced out for no reason	Health/m edical reasons	I was behind on rent	Poor condition of property	Because of apartment rules	Utilities were too expensive/ shut off	Natural disaster/ flooding/ fire	n
Jurisdiction																	
County	21%	2066	29%	19%	18%											417	
Belmont	26%	80	25%					25%					30%			20	
Brisbane	24%	67				25%			31%		25%					16	
Burlingame	22%	152	24%		30%	18%										33	
Daly City	25%	115	35%	27%					31%							26	
East Palo Alto	32%	50	20%	20%			20%									15	
Foster City	11%	130			21%	21%			21%	43%						14	
Half Moon Bay	31%	51			31%	25%										16	
Hillsborough	12%	52				33%	33%			33%	33%	33%				6	
Milbrae	27%	44					42%		33%		25%				25%	12	
Pacifica	21%	75			31%				31%	31%						16	
Redwood City	29%	146	31%								21%					42	
San Bruno	25%	89	33%	29%					24%							21	
San Mateo	37%	153	35%	31%							20%					54	
South San Francisco	12%	712	42%	15%	16%											81	
Race/Ethnicity																	
African American	59%	134				29%			30%	28%						79	
Asian	22%	500				31%			22%	22%						109	
Hispanic	29%	397	33%	22%								18%				115	
Other Race	28%	149	54%						20%					24%		41	
Non-Hispanic White	14%	757	27%	20%	31%											102	
Tenure																	
Homeowner	8%	975		27%		25%			31%							75	
Renter	34%	905	32%	18%	22%											292	
Precariously Housed	48%	280	23%				24%			23%						132	
Income																	
Less than \$25,000	45%	282	28%	20%					20%	20%						127	
\$25,000-\$49,999	30%	265	31%		19%						18%					78	
\$50,000-\$99,999	22%	517	32%	22%	18%											115	
Above \$100,000	8%	721			27%	20%	23%									60	
Household Characteristics																	
Children under 18	30%	840	27%			20%	19%									249	
Large Households	20%	284	32%		19%							18%				57	
Single Parent	55%	240				24%			24%	20%						131	
Disability	34%	711	26%	20%			20%		20%							241	
Older Adults (age 65+)	22%	736	23%	22%		22%										162	

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Children changing schools after displacement. Overall, for households with children that were displaced in the past five years, **60% of children in those households have changed schools.** The most common outcomes reported among these respondents included *school is more challenging* (28%), *they feel less safe at the new school* (25%), and *they are in a worse school* (24%) (Figure 15).

Among respondents by race/ethnicity, non-Hispanic White households (44%) were the only subgroup to report that being displaced resulted in their children being in better schools. Of African American households that were displaced and have children, 87% reported that their children changed schools. Of these respondents, 32% reported that their children *feel safer at the new school* but also *have fewer activities*.

Among respondents by tenure, precariously housed (78%) and homeowner (74%) households had the highest proportion of children who changed schools. The most common outcomes for precariously housed households included *School is less challenging/they are bored* (35%) and their children *feel less safe at school* (34%). For homeowner households, 39% reported that *school is more challenging*, followed by 31% who reported that their children *feel less safe at school*.

Among respondents by selected household characteristics, older adult (77%), single parent (74%), households with a member experiencing a disability (70%), and households with children under 18 (67%) all reported high proportions of children who changed schools. The most common outcomes for these respondents included *School is more challenging* and *they feel less safe at the new school*.

Figure 15. Children Changing Schools and Outcomes, Displaced Households

	Percent of Children that Changed Schools		School change outcomes									
			School is less challenging/ they are bored	School is more challenging	They are in a better school	They are in a worse school	They feel less safe at the new school	They feel safer at the new school	They have fewer activities	They have more activities	Things are about the same	n
Jurisdiction												
County	60%	306		28%		24%	25%					183
Belmont	45%	20		33%		44%	33%					9
Brisbane	81%	16		38%			31%	31%				13
Burlingame	55%	22	33%	33%						33%		12
Daly City	41%	17	43%		29%		29%			29%		7
East Palo Alto	54%	13	43%	57%			29%					7
Foster City	62%	13								50%		8
Half Moon Bay	58%	12		43%			29%	29%	43%			7
Hillsborough	60%	5						67%				3
Milbrae	82%	11		33%		44%	44%	33%				9
Pacifica	91%	11				50%						10
Redwood City	52%	23			25%	33%		25%				12
San Bruno	67%	18	33%		33%		33%					12
San Mateo	66%	35	32%		32%							22
South San Francisco	36%	56		26%	26%						26%	19
Race/Ethnicity												
African American	87%	69	30%	30%				32%	32%			60
Asian	73%	91	27%	32%		32%	27%					66
Hispanic	49%	91		23%		30%	23%		25%			44
Other Race	65%	31		40%		30%	25%	25%				20
Non-Hispanic White	60%	60	28%	31%	44%		28%					36
Tenure												
Homeowner	74%	66		39%		29%	31%					49
Renter	58%	213	25%	30%			25%					122
Precariously Housed	78%	104	35%				34%		30%			80
Income												
Less than \$25,000	65%	92	22%	32%			35%					60
\$25,000-\$49,999	66%	56	25%			28%		28%	25%			36
\$50,000-\$99,999	55%	85		30%	28%		23%					47
Above \$100,000	59%	44	35%	31%		38%						26
Household Characteristics												
Children under 18	67%	237		32%		23%	25%					158
Large Households	45%	44		32%	26%						32%	19
Single Parent	74%	124		32%		28%	29%					92
Disability	70%	188	26%	28%			30%					132
Older Adults (age 65+)	77%	117		35%		29%	29%					89

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Experience with housing discrimination. Overall, **19% of survey respondents felt they were discriminated against when they looked for housing** in the area.¹ As shown in Figure 16, African American respondents (62%), single parent households (44%) and precariously housed respondents (39%) are most likely to say they experienced housing discrimination. Residents with income above \$100,000 and homeowners are least likely (11%).

Respondents who believed they experienced discrimination when looking for housing in the county reported when the discrimination occurred. Nearly half of respondents (45%) reported that the discrimination they experienced occurred between 2 and 5 years ago. Twenty eight percent of respondents reported that the discrimination occurred in the past year, 20% reported more than 5 years ago and 7% of respondents did not remember when the discrimination occurred.

How discrimination was addressed. Respondents who believed they experienced discrimination when looking for housing in the county were asked to describe the actions they took in response to the discrimination. Overall, the most common responses to discrimination experienced by survey respondents were *Nothing/I wasn't sure what to do* (42%), *Moved/found another place to live* (30%), and *Nothing/I was afraid of being evicted or harassed* (20%).

Among top responses for actions taken in response to experienced discrimination, every group reported *Nothing/I wasn't sure what to do* with the exception of African American and single parent households, as well as Brisbane and Hillsborough residents. Similarly, survey respondents from Foster City and Pacifica were the only groups not to include *Moved/found another place to live* among their top responses. African American and Asian households, as well as single parent households, were more likely than other groups to contact either a housing authority, local fair housing organization, or the California Department of Housing or Civil Rights to report their discrimination incident.

Reasons for discrimination. Respondents who believed they experienced discrimination when looking for housing in the county provided the reasons why they thought they were discriminated against. Note that the basis offered by residents is not necessarily protected by federal, state, or local fair housing law, as respondents could provide open-ended and multiple reasons why they thought they experienced discrimination.

Examples of how respondents described why they felt discriminated against, which they provided as open-ended responses to the survey, include:

¹ Note that this question applies to all respondents, not just those who seriously looked for housing in the past five years.

Appearance/Characteristics

- *"Because of my race and ethnicity"*
- *"[We] were given a subprime loan for home purchase for being Latinx, low-income and primarily Spanish-speaking; refinance last year was lower than expected."*
- *"It was clear my disability is the reason"*
- *"I have a child and a couple places told me they wouldn't rent to me due to my son."*
- *"The agent asked if I was a tech worker. When I said no, the agent said the place was just rented, even though it was on the listing as active."*
- *"I was approved for the unit and when they met my partner, who is Black, they said [the unit] was rented."*

Source of Income/Credit

- *"Income was through SSDI [social security disability insurance]"*
- *"The landlord wanted an excellent credit score..."*
- *"We were not able to provide all the requirement to rent, like SSN [social security number], income proof, employment, and we don't make enough income..."*
- *"They wanted someone with income from employment not due to disability."*
- *"I was discriminated against because of my race and the fact that I had Section 8 at the time. Being African American and having Section 8 made a lot of people feel like I wouldn't take care of their property."*
- *"I am currently being discriminated against due to my need with rental help and because two of us in our household have a need for an emotional support animal."*

Immigration status

- *Mi hermana llamo a los departamentos donde yo vivo y la manager le dijo que no había disponible pero no era verdad también le dijo que hablara inglés y le pidió seguro social pensando que no tenia y le dijo que tenía que ganar una cierta cantidad de dinero para poder rentar. (My sister called the apartments where I live and the manager told her that there was no one available but it was not true. She also told her to speak English and asked for social security thinking that she did not have it and told her that she had to earn a certain amount of money to be able to rent).*

Figure 16. Percent of respondents who felt they were discriminated against and how was it addressed

	Percent who felt they were discriminated against	In the past year	2 to 5 years ago	More than 5 years ago	Don't remember	n	Nothing/ I wasn't sure what to do	Moved/ found another place to live	Nothing/ I was afraid of being evicted/ harassed	Called/ emailed housing authority	Called/ emailed local fair housing organization	Called/ emailed California Department of Housing/ Civil Rights	Called/ emailed City office, County office, or human rights department/ agency	Filed a complaint	Other	n
Jurisdiction																
County	19%	28%	45%	20%	7%	357	42%	30%	20%							359
Belmont	21%	19%	56%	19%	6%	16	38%	38%	50%							16
Brisbane	22%	29%	36%	29%	7%	14		64%			21%		21%			14
Burlingame	14%	25%	50%	20%	5%	20	35%	25%		20%		20%				20
Daly City	15%	20%	40%	33%	7%	15	56%	25%	25%							16
East Palo Alto	29%	23%	54%	15%	8%	13	38%	38%	23%	23%						13
Foster City	18%	15%	40%	45%	0%	20	38%						24%	24%		21
Half Moon Bay	26%	27%	55%	9%	9%	11	27%	36%			36%					11
Hillsborough	15%	14%	71%	0%	14%	7		29%			57%					7
Milbrae	29%	36%	50%	7%	7%	14	31%	23%		38%		23%				13
Pacifica	21%	29%	36%	36%	0%	14	50%		21%	29%		21%			21%	14
Redwood City	24%	34%	34%	19%	13%	32	47%	26%	21%	21%						34
San Bruno	12%	30%	60%	0%	10%	10	50%	30%		30%	30%					10
San Mateo	30%	35%	45%	15%	5%	40	53%	26%	26%							38
South San Francisco	13%	30%	40%	23%	6%	82	59%	27%								83
Race/Ethnicity																
African American	62%	16%	59%	25%	0%	83		36%	29%	27%	26%	27%	24%			84
Asian	16%	24%	50%	20%	6%	82	28%	25%	29%	29%	24%	24%				83
Hispanic	27%	25%	42%	24%	8%	107	52%	27%								107
Other Race	30%	28%	47%	14%	12%	43	47%	30%	26%							43
Non-Hispanic White	12%	38%	41%	14%	7%	91	44%	27%	18%							91
Tenure																
Homeowner	11%	26%	46%	20%	7%	95	32%	29%	22%							96
Renter	28%	26%	47%	20%	6%	232	42%	32%	23%							232
Precariously Housed	39%	21%	54%	20%	4%	98	24%	28%		35%		26%				100
Income																
Less than \$25,000	36%	29%	51%	11%	9%	100	39%	30%	25%							102
\$25,000-\$49,999	24%	31%	41%	22%	6%	64	42%	36%	25%	22%						64
\$50,000-\$99,999	19%	27%	45%	25%	3%	97	44%	29%			18%					97
Above \$100,000	11%	28%	45%	21%	7%	76	45%	22%	16%	16%						76
Household Characteristics																
Children under 18	26%	21%	57%	15%	6%	216	36%	31%	26%							218
Large Households	19%	26%	52%	9%	13%	54	65%	24%	15%							55
Single Parent	44%	13%	65%	17%	5%	106		33%	32%	27%	26%	26%				107
Disability	33%	27%	48%	21%	4%	215	33%	30%		22%						219
Older Adults (age 65+)	20%	20%	51%	20%	8%	144	24%	34%	24%	24%						146

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Experience of persons with disabilities. Overall, 35% of respondents' households include a member experiencing a disability. Of these households, 26% said their housing does not meet their accessibility needs; 74% report that their current housing situation meets their needs. The three top greatest housing needs expressed by respondents included grab bars in bathroom or bench in shower (34%), supportive services to help maintain housing (33%), and ramps (26%). Other needs expressed by a substantial proportion of groups included *wider doorways*, *reserved accessible parking spot by the entrance*, and *more private space in the facility in which I live*.

Of respondents by jurisdiction, East Palo Alto (64%) has the lowest proportion of respondents with disabilities whose current housing situation meets their needs. Of these respondents, 63% indicated they needed supportive services to help maintain housing.

The highest proportion of respondents by group reporting that they or a member of their household experiences a disability were African American (71%), households making less than \$25,000 (59%), single parent households (58%), and precariously housed respondents (56%).

Figure 17. Respondents experiencing a disability and their top three greatest housing needs

	Percent of respondents with a disability	Current housing situation meeting needs	Total n	Grab bars in bathroom or bench in shower	Supportive services to help maintain housing	Ramps	Wider doorways	Reserved accessible parking spot by entrance	More private space in the facility in which I live	Service or emotional support animal allowed	Would like to live alone (not with a roommate)	Fewer restrictions/ more freedom	Alarm to notify if a non-verbal child leaves the home	Fire alarm/doorbell made accessible for person with hearing disability/deaf	Better navigation for person who is blind	n
Jurisdiction																
County	35%	74%	711	34%	33%	26%										171
Belmont	35%	89%	28	67%	67%											3
Brisbane	37%	72%	25	29%	29%		29%	29%								7
Burlingame	27%	80%	41	63%	50%											8
Daly City	34%	68%	38		36%		36%		45%		36%					11
East Palo Alto	44%	64%	22		63%											8
Foster City	31%	83%	40		29%		29%									7
Half Moon Bay	45%	68%	22	29%								29%				7
Hillsborough	26%	100%	13													n/a
Milbrae	40%	82%	17	25%					25%	25%			25%	25%	25%	4
Pacifica	39%	93%	29				100%									2
Redwood City	42%	68%	62	33%	28%	28%			33%							18
San Bruno	40%	82%	34	50%		33%		33%								6
San Mateo	43%	72%	65	41%	47%					41%						17
South San Francisco	30%	68%	210	35%	28%	32%										57
Race/Ethnicity																
African American	71%	87%	95		40%		40%	33%								15
Asian	31%	77%	157	29%	34%	26%			26%							35
Hispanic	41%	70%	162	37%	54%				35%							46
Other Race	38%	71%	56	63%		50%	44%									16
Non-Hispanic White	32%	77%	241	33%		27%		21%								52
Tenure																
Homeowner	29%	82%	280	35%		37%		37%								43
Renter	39%	73%	347	41%	40%				27%							88
Precariously Housed	56%	71%	154		37%		26%				33%					43
Income																
Less than \$25,000	59%	71%	167		42%				27%		23%					48
\$25,000-\$49,999	40%	67%	107		45%	45%	45%									31
\$50,000-\$99,999	35%	77%	180	43%	26%	24%										42
Above \$100,000	23%	82%	167	52%		34%		41%								29
Household Characteristics																
Children under 18	35%	78%	293		40%		29%		32%							63
Large Households	35%	70%	99	41%	45%				34%							29
Single Parent	58%	81%	139		48%		28%		41%							29
Older Adults (age 65+)	46%	76%	337	44%	29%	30%										79

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Transportation. Over 80% of respondents indicated the type of transportation used most often is driving a personal vehicle. This share was relatively similar across the majority of jurisdictions and was the number one type of transportation used across all jurisdictions and demographic characteristics.

The groups with the lowest proportion of those who primarily drive included African American (40%), households making less than \$25,000 (53%), single parents (57%), and precariously housed (57%) respondents.

As shown in Figure 18, on average respondents are fairly satisfied with their transportation situation. Those groups somewhat or not at all satisfied with their transportation options include African American (58%), Brisbane (51%), single parents (45%) and precariously housed (44%) respondents.

Figure 18.
Are you satisfied
with your current
transportation
options?

Source:

Root Policy Research from the
2021-2022 21 Elements AFFH
Resident Survey.

	Entirely satisfied	Mostly satisfied	Somewhat unsatisfied	Not at all satisfied	n
Jurisdiction					
County	29%	45%	20%	6%	1,903
Belmont	21%	42%	27%	10%	78
Brisbane	17%	33%	38%	13%	64
Burlingame	32%	45%	21%	1%	139
Daly City	19%	52%	20%	8%	109
East Palo Alto	31%	36%	24%	9%	45
Foster City	29%	43%	20%	9%	115
Half Moon Bay	30%	35%	26%	9%	46
Hillsborough	50%	34%	14%	2%	44
Milbrae	30%	45%	13%	13%	40
Pacifica	28%	42%	15%	15%	65
Redwood City	30%	36%	27%	8%	142
San Bruno	23%	54%	19%	4%	81
San Mateo	29%	52%	14%	4%	134
South San Francisco	34%	48%	15%	3%	666
Race/Ethnicity					
African American	22%	21%	48%	10%	134
Asian	23%	49%	24%	4%	500
Hispanic	29%	43%	22%	7%	397
Other Race	29%	41%	21%	9%	149
Non-Hispanic White	32%	45%	17%	5%	757
Tenure					
Homeowner	31%	45%	18%	6%	905
Renter	27%	44%	23%	6%	834
Precariously Housed	20%	36%	35%	9%	254
Income					
Less than \$25,000	22%	39%	29%	10%	282
\$25,000-\$49,999	25%	42%	26%	8%	265
\$50,000-\$99,999	28%	52%	16%	4%	517
Above \$100,000	34%	44%	18%	4%	721
Household Characteristics					
Children under 18	25%	43%	25%	6%	840
Large Households	29%	50%	18%	4%	284
Single Parent	20%	36%	38%	7%	240
Disability	25%	40%	27%	8%	658
Older Adults (age 65+)	30%	43%	21%	6%	736

Solutions offered by residents. Respondents were asked a series of questions about how to improve their situations related to housing, employment, health, education and neighborhood.

Improve housing security. When asked what could improve a respondent's housing security, the top answers among respondents by jurisdiction, race/ethnicity, tenure, income, and other selected housing characteristics were *none of the above* and *help me with a downpayment/purchase*.

The highest proportion of respondents among groups that selected *None of the above* includes:

- Hillsborough residents, 71%
- Owners, 65%
- Income greater than \$100,000, 54%
- Foster City residents, 53%
- White, 51%
- Burlingame residents, 50%

The highest proportion of respondents among groups that selected *Help me with a downpayment or purchase* includes:

- Renters, 44%
- Large households, 42%
- Daly City residents, 41%
- Hispanic, 39%
- Precariously housed, 39%
- City of San Mateo residents, 37%

Other solutions to improve housing security identified by several different groups included *Help me with the housing search*, *help me pay rent each month*, and *find a landlord who accepts Section 8*. The highest proportion of respondents among groups that selected these solutions includes:

Help me with the housing search

- Precariously housed, 39%
- Income less than \$25,000, 34%
- Income between \$25,000-\$50,000, 29%

- Half Moon Bay residents, 27%

Help me pay rent each month

- Income less than \$25,000, 35%
- Single parent, 31%

Find a landlord who accepts Section 8

- Black or African American, 37%

Improve neighborhood situation. When asked what could improve a respondent's neighborhood situation, nearly every respondent group by jurisdiction, race/ethnicity, tenure, income, and other selected housing characteristics identified *Better lighting*. Other solutions flagged by multiple respondent groups to improve their neighborhood situations includes *Improve street crossings* and *none of the above*.

The highest proportion of respondents among groups that selected *Better lighting* includes:

- East Palo Alto residents, 45%
- Millbrae residents, 45%
- Other race, 42%
- Daly City residents, 41%
- Hispanic, 40%
- Income between \$25,000-\$50,000, 40%
- Income between \$50,000-\$100,000, 40%

The highest proportion of respondents among groups that selected *Improve street crossings* includes:

- City of San Mateo residents, 34%
- Single parent, 31%

The highest proportion of respondents among groups that selected *None of the above* includes:

- Foster City residents, 37%
- Hillsborough residents, 36%
- Burlingame residents, 28%

Additionally, 42% of Millbrae respondents chose *Reduce crime*, 40% of Brisbane respondents chose *More stores to meet my needs*, and Belmont (34%) and Half Moon Bay (33%) respondents chose *Build more sidewalks*.

Improve health situation. When asked what could improve a respondent's health situation, the majority of respondent groups by jurisdiction, race/ethnicity, tenure, income, and other selected housing characteristics selected *Make it easier to exercise*, *More healthy food* and *None of the above*.

The highest proportion of respondents among groups that selected *Make it easier to exercise* includes:

- Redwood City residents, 48%
- Hispanic, 42%
- South San Francisco residents, 41%
- City of San Mateo residents, 41%
- Asian, 41%
- Renters, 40%

The highest proportion of respondents among groups that selected *More healthy food* includes:

- East Palo Alto residents, 48%
- Precariously Housed, 47%
- Single parent, 41%
- Daly City residents, 40%
- Income less than \$25,000, 38%
- Black or African American, 37%
- Large Households, 37%

The highest proportion of respondents among groups that selected *None of the above* includes residents from:

- Hillsborough residents, 48%
- Burlingame residents, 47%
- Foster City residents, 42%
- White, 41%
- Owners, 39%

Additionally, African American (34%) and San Bruno (29%) respondents identified *Better access to mental health care* as a solution to help improve their health situations.

Improve job situation. When asked what could improve a respondent's employment situation, the majority of respondent groups by jurisdiction, race/ethnicity, tenure, income, and other selected housing characteristics selected *Increase wages* and *None of the above*.

The highest proportion of respondents among groups that selected *Increase wages* includes:

- Renters, 52%
- Single parents, 50%
- Hispanic, 49%
- Households with children, 49%
- Daly City residents, 49%
- Income between \$50,000-\$100,000, 49%
- Large households, 48%

The highest proportion of respondents among groups that selected *None of the above* includes:

- Hillsborough residents, 76%
- Owners, 58%
- White, 57%
- Over 65+, 53%
- Income greater than \$100,000, 53%
- Foster City residents, 53%

Additionally, 29% of households with income less than \$25K identified *Find a job near my apartment or house* as a solution to help improve their situation.

Improve education situation. When asked what could improve a respondent's education situation for their children, the majority of respondent groups by jurisdiction, race/ethnicity, tenure, income, and other selected housing characteristics selected *None of the above*, *Have more activities*, and *Stop bullying/crime/drug use at school*.

The highest proportion of respondents among groups that selected *None of the above* includes:

- Burlingame residents, 55%
- White, 52%
- Over 65+, 51%
- Hillsborough residents, 49%
- Foster City residents, 46%
- Brisbane residents, 45%

The highest proportion of respondents among groups that selected *Have more activities* includes:

- Single parent, 45%
- Households with children, 41%
- Large households, 41%
- Other race, 37%
- Daly City residents, 34%
- Hispanic, 34%

The highest proportion of respondents among groups that selected *Stop bullying/crime/drug use at school* includes:

- East Palo Alto residents, 38%
- Precariously housed, 31%
- Other race, 30%
- Redwood City residents, 29%
- Hispanic, 29%
- San Mateo residents, 28%

Additionally, 29% of Millbrae respondents identified *Have better teachers at their schools* as a means to improve the education situation in their respective households.

Appendix G

Sites Inventory AFFH Supplement

Please refer to HCD AFFH Guidance pages 45 to 49 for full details on the analysis and expectations of HCD. This section summarizes the distribution of RHNA units in the City of San Bruno by income target in relation to four factors of segregation including household income, people of color, households with a disability, and households with children. The following figures show the share of units by income within areas that have a concentration of household types compared to the citywide rate. This supplement provides a summary of the data available through ABAG's HESS mapping tool for evaluating the fair housing impacts of the RHNA sites chosen. Additional analysis and narrative should be added based on local data and other relevant factors to completely satisfy HCD requirements.

Maps of your selected sites overlaid with the following AFFH layers can be downloaded from the HESS tool at: <https://hess.abag.ca.gov/login>

Additional guidance from Root Policy Research on finishing up the sites inventory and the AFFH analysis can be found in the following memo:

<http://www.21elements.com/documents-mainmenu-3/housing-elements/rhna-6-2022-2030/1344-finish-up-affh-sections-of-housing-elements/file>

Segregation and integration. This section summarizes the distribution of RHNA units in the City of San Bruno by income target in relation to four factors of segregation including household income, people of color, households with a disability, and households with children. The following figures show the share of units by income within areas that have a concentration of household types compared to the citywide rate.

- Figure 1 shows how many units are allocated to areas of the city (census tracts) with a share of Low-Moderate Income (LMI) households (earning less than 80% AMI) greater than or less than the citywide rate of 44% of households. Most of the proposed RHNA units (74%) are in areas of the city with a higher share of LMI households compared to the citywide rate.
- Figure 2 shows how many units are estimated in areas of the city with a percent of the population that identified as a Person of Color (non-White population) greater than and less than the citywide share of 67% of the population. Again, 74% of units are located in areas with a concentration of People of Color and 26% of proposed units are in areas with a lower share of People of Color.

- Figure 3 shows the share of the proposed units that are located in areas with a concentration of population with a disability compared to the citywide rate of 8% of the population living with a disability. One in four units (26%) are located in areas of the city with a concentration of residents living with a disability.
- Figure 4 shows how many units are allocated to areas of the city with a greater share of households with children compared to the citywide rate of 31% of households. Most units (74%) are not within areas with a concentration of households that have children. Only 26% of proposed units are located in areas with a concentration of families with children.

Figure 1.
Share of RHNA Units by
Income and Share
Households Earning less
than 80% AMI

Note:

44% of households in the City of San Bruno earn less than 80% AMI.

Source:

ABAG HESS tool and Root Policy Research.

	% LMI Households	
	Greater than Citywide rate	Less than Citywide rate
Total	1,716	604
Very Low Income Units	385	137
Low Income Units	219	76
Moderate Income Units	309	112
Above Moderate Income Units	804	278
Total	74%	26%
Very Low Income Units	74%	26%
Low Income Units	74%	26%
Moderate Income Units	73%	27%
Above Moderate Income Units	74%	26%

Figure 2.
Share of RHNA Units by
Income and Share of
People of Color

Note:

67% of the population in the City of San Bruno is a Person of Color.

Source:

ABAG HESS tool and Root Policy Research.

	% People of Color	
	Greater than Citywide rate	Less than Citywide rate
Total	1,716	604
Very Low Income Units	385	137
Low Income Units	219	76
Moderate Income Units	309	112
Above Moderate Income Units	804	278
Total	74%	26%
Very Low Income Units	74%	26%
Low Income Units	74%	26%
Moderate Income Units	73%	27%
Above Moderate Income Units	74%	26%

Figure 3.
Share of RHNA Units
by Income and Share
of People with a
Disability

Note:

8% of the population in the City of San Bruno has a disability.

Source:

ABAG HESS tool and Root Policy Research.

	% People with a Disability	
	Greater than Citywide rate	Less than Citywide rate
Total	604	1,716
Very Low Income Units	137	385
Low Income Units	76	219
Moderate Income Units	112	309
Above Moderate Income Units	278	804
Total	26%	74%
Very Low Income Units	26%	74%
Low Income Units	26%	74%
Moderate Income Units	27%	73%
Above Moderate Income Units	26%	74%

Figure 4.
Share of RHNA
Units by Income
and Share of
Households with
Children

Note:

31% of households in the City of San Bruno have child(ren).

Source:

ABAG HESS tool and Root Policy Research.

	% Households with Children	
	Greater than Citywide rate	Less than Citywide rate
Total	614	1,706
Very Low Income Units	142	380
Low Income Units	76	219
Moderate Income Units	114	307
Above Moderate Income Units	283	799
Total	26%	74%
Very Low Income Units	27%	73%
Low Income Units	26%	74%
Moderate Income Units	27%	73%
Above Moderate Income Units	26%	74%

Racially and Ethnically Concentrated Areas of Poverty and Affluence. None of the proposed units are within an R/ECAP or RCAA.

Disparities in access to opportunity. This section summarizes the distribution of RHNA units in the City of San Bruno by income target by TCAC defined resource areas.

- Figure 5 shows the proposed units by TCAC resource areas including low, moderate, and high resource areas in the City of San Bruno. The vast majority of units (80%) are in moderate resources areas compared to low (14%) or high (7%) resource areas. There are no highest resource areas in the City of San Bruno.

Figure 5.

Share of RHNA Units by TCAC Resource Area

	TCAC Resource Areas		
	Low Resource	Moderate Resource	High Resource
Total	317	1,846	157
Very Low Income Units	73	414	35
Low Income Units	40	234	21
Moderate Income Units	57	336	28
Above Moderate Income Units	148	861	73
Total	14%	80%	7%
Very Low Income Units	14%	79%	7%
Low Income Units	14%	79%	7%
Moderate Income Units	14%	80%	7%
Above Moderate Income Units	14%	80%	7%

Source: ABAG HESS Tool and Root Policy Research.

Disproportionate housing needs. This section summarizes the distribution of RHNA units in the City of San Bruno by income target based on three indicators of disproportionate housing needs including housing cost burden, overcrowding, and displacement risk.

- Figure 6 shows the estimated share of units in areas of the city with a higher rate of cost burden among households compared to the citywide rate of 38%. All of the RHNA units are proposed in areas of the city with a lower than average rate of housing cost burden.
- Figure 7 shows the proposed share of units in areas of the city with a higher or lower rate of overcrowding compared to the citywide rate of 8%. Again, all of the proposed units are in areas that have lower than average rates of overcrowding.
- Figure 8 shows the estimated share of units by displacement risk. Most units (80%) are within areas that are moderate or mixed stable neighborhoods. The remaining units (14%) are in areas that are exclusive or becoming exclusive.

Figure 6.
Share of RHNA
Units by Income
and Share of
Cost Burdened
Households

Note:

38% of households in the City of San Bruno are cost burdened.

Source:

ABAG HESS tool and Root Policy Research.

	% Households Cost Burdened	
	Greater than Citywide rate	Less than Citywide rate
Total	0	2,320
Very Low Income Units	0	522
Low Income Units	0	295
Moderate Income Units	0	421
Above Moderate Income Units	0	1,082
Total	0%	100%
Very Low Income Units	0%	100%
Low Income Units	0%	100%
Moderate Income Units	0%	100%
Above Moderate Income Units	0%	100%

Figure 7.
Share of RHNA
Units by Income
and Share of
Overcrowded
Households

Note:

8% of households in the City of San Bruno are overcrowded. Areas with no data have too few observations to disclose.

Source:

ABAG HESS tool and Root Policy Research.

	% Households Overcrowded		
	Greater than Citywide rate	Less than Citywide rate	No data
Total	0	1,866	454
Very Low Income Units	0	418	104
Low Income Units	0	238	57
Moderate Income Units	0	336	85
Above Moderate Income Units	0	874	208
Total	0%	80%	20%
Very Low Income Units	0%	80%	20%
Low Income Units	0%	81%	19%
Moderate Income Units	0%	80%	20%
Above Moderate Income Units	0%	81%	19%

Figure 8.
Share of RHNA Units by Displacement Risk

	Displacement Risk		
	At Risk of Becoming Exclusive	Becoming Exclusive	Stable Moderate/ Mixed Income
Total	317	157	1,846
Very Low Income Units	73	35	414
Low Income Units	40	21	234
Moderate Income Units	57	28	336
Above Moderate Income Units	148	73	861
Total	14%	7%	80%
Very Low Income Units	14%	7%	79%
Low Income Units	14%	7%	79%
Moderate Income Units	14%	7%	80%
Above Moderate Income Units	14%	7%	80%

Source: ABAG HESS Tool and Root Policy Research.

Appendix H

Disparate Access to Educational Opportunities

This section examines the extent to which members of protected classes and those in poverty experience disparities in access to opportunity as measured by access to education. This section draws from data provided by the San Mateo Office of Education, the California Department of Education, and U.S. Census American Community Surveys (ACS). This section discusses the following topics:

- Changes in school enrollment during COVID-19 by race and ethnicity, and by groups with extenuating circumstances;¹
- Achievement gaps by race and ethnicity and for groups with extenuating circumstances as measured by test scores, California State University or University of California admissions standards, and college-going rates;
- Barriers to success measured by chronic absenteeism, dropout rates, and suspension rates.

After describing this section's primary findings, we describe the county's school districts before launching into data measuring achievement gaps and barriers to success.

Primary Findings

Student racial and ethnic diversity is modestly increasing. Student bodies in San Mateo County have become increasingly racially and ethnically diverse.

- Hispanic students make up the largest ethnic group in the county's schools, representing 38% of students in the 2020-2021 academic school year. This a slight increase from the 2010-2011 school year, where Hispanic students made up 37% of the population.
- There has been a large increase in Asian students, with 17% identifying as such in 2020-2021, an increase of 5 percentage points from 2010-2011.

¹ The term "extenuating circumstances" is used in this section to capture students whose socioeconomic situations and/or disability may make standard educational environments challenging.

- Students identifying as White (26%) have decreased by 3 percentage points since 2010-2011.

Free and reduced lunch-qualifying students and English language learners are concentrated in a handful of schools. Overall, 29% of public school students in San Mateo County qualify for reduced or free lunch.

- The rate of reduced lunch qualification was highest in Ravenswood City Elementary School District, where 83% of students qualify for reduced lunch. Also in Ravenswood City Elementary, 30% of students are experiencing homelessness. This is a large outlier in the county, where overall just 2% are experiencing homelessness.
- Countywide, 20% of public school students are English learners. Again, this rate is highest at Ravenswood City Elementary, where 53% of students are English learners. La Honda-Pescadero Unified School District, Jefferson Union High School, and Redwood City Elementary also have high rates of English learners, representing more than a third of students.

Enrollment is dropping. Public school enrollment reduced substantially in some areas during the pandemic. Total enrollment decreased by 3% between 2019-2020 and 2020-2021 in San Mateo County, which was the largest decrease of the decade.

- Portola Valley and La Honda-Pescadero school districts had the largest enrollment decreases during COVID-19, with a 11% and 10% decline in enrollments, respectively.
- Decreased enrollment was especially common among Pacific Islander students. Between 2019-2021, enrollment among Pacific Islander students decreased by 6% (from 1,581 students in 2019-20 to 1,484 students in 2020-21), substantially higher than the 3% countywide average.
- Enrollment among migrant students decreased drastically by 16% over the same period (from 332 students to 279 students).

Learning proficiency is improving yet disparities exist. Across all racial and ethnic groups, the rate at which students met or exceeded English and mathematics testing standards has increased since the 2014-2015 school year. Students with extenuating circumstances (i.e., disability, facing homelessness, learning English) tend to score lower on English and mathematics tests than the overall student body.

- Proficiency gaps are especially pronounced among English learning students in Portola Valley Elementary, Woodside Elementary, Menlo Park City Elementary, and Brisbane Elementary, where students with extenuating circumstances met or exceeded mathematics test standards at a rate at least 50 percentage points below the overall test rate in each district.

- Students with disabilities in San Carlos Elementary and Las Lomitas Elementary school districts scored far below the overall student body: In these districts, students with disabilities met or exceeded mathematics test standards at 54 percentage points below the overall test rate.

Many students meet admissions standards for CSU or UC schools.

- Among the high school districts in San Mateo County, Sequoia Union had the highest rate of graduates who met such admission standards, at 69%. On the other end of the spectrum, Cabrillo Unified and South San Francisco Unified had the lowest rates at 41%.
- Jefferson Union High School District had the most drastic increase in the share of graduates meeting CSU or UC standards: just 21% of students met these standards in 2016-2017 compared to 48% of students in 2019-2020. La Honda-Pescadero Unified School District experienced a 10 percentage point increase in this success rate over the same period.

Most school districts in the county have a college-going rate at 70% or higher—yet there are wide gaps by race and ethnicity.

- In every district, White students have a higher college-going rate than Hispanic students, but the largest gaps are in South San Francisco Unified, where 91% of White students go to college compared to just 68% of Hispanic students—a 23 percentage point gap.

Students with extenuating circumstances are highly concentrated in a few schools and move schools often due to housing instability.

- Students with extenuating circumstances may need additional resources—e.g., onsite health care, free meals, tutoring—to be successful in school. When these students are concentrated into a few schools, the schools bear an unequal responsibility for providing needed resources. K-12 school funding in California has long been inadequate, and, although policymakers have recently allocated additional resources to schools with high proportions of low income children under a “concentration grant” system, funding gaps remain.
- The highest concentration of high needs students is found in Ravenswood City Elementary, where 30% of all students are experiencing homelessness and 83% qualify for free and reduced lunch.
- Currently, students whose families have been evicted do not have protections allowing them to remain in their current school district. This can result in frequent changes in schools for low income children, raising their vulnerability to falling behind in school.

Absenteeism, dropout rates, and discipline rates are highest for students of color, students with disabilities, and students with other extenuating circumstances. While 10% of students were chronically

absent during the 2018-2019 school year, chronic absenteeism rates were higher in districts with a large number of students experiencing economic and housing precarity.

- For instance, Ravenswood Elementary, which has a 30% rate of homelessness among students, had one of the higher rates of chronic absenteeism at 16%.
- Pacific Islander students (26%), Black/African American students (18%), and Hispanic students (15%) had notably higher rates of chronic absenteeism than the overall student population (10%).
- In most districts, chronic absenteeism is higher among students with disabilities. In fact, only Bayshore Elementary's students with disabilities had a lower rate of chronic absenteeism than the overall student body.

Dropout rates vary across the county:

- Dropout rates were highest in Sequoia Union High School District (10%) and South San Francisco Unified (9%).
- In all school districts in the county, dropout rates are higher for boys than for girls.
- Pacific Islander, Black/African American, and Hispanic students in the county often had higher dropout rates than those in other racial and ethnic groups
- Students with disabilities, students experiencing homelessness, foster youth, and students learning English had higher dropout rates than the overall population.

Discipline rates also vary by area and race and ethnicity.

- In many school districts across San Mateo County, Hispanic students are disciplined at disproportionately higher rates compared to their peers.
- In most districts, Black/African American and Pacific Islander students are also overrepresented in terms of suspension rates, but these rates are slight compared to those of Hispanic students.
- Asian and Filipino students were underrepresented in terms of suspension rates. White students were also underrepresented in discipline rates in most districts except for La Honda-Pescadero.

The demographics of faculty and staff are fairly similar to that of students.

- There is a slightly larger share of White and Black/African American staff than students, meaning that Black/African American and White student groups are more likely to interact with same-race staff and faculty than other racial groups.
- Asian students are less likely to interact with a same-race staff or faculty member: 17% of the student body is Asian compared to just 8% of staff and faculty.

Background

This section describes the school districts in San Mateo County, including their geographic boundaries and a brief history of the school districts' formation. This section also includes details on how districts' enrollments and student demographic have changed over time.

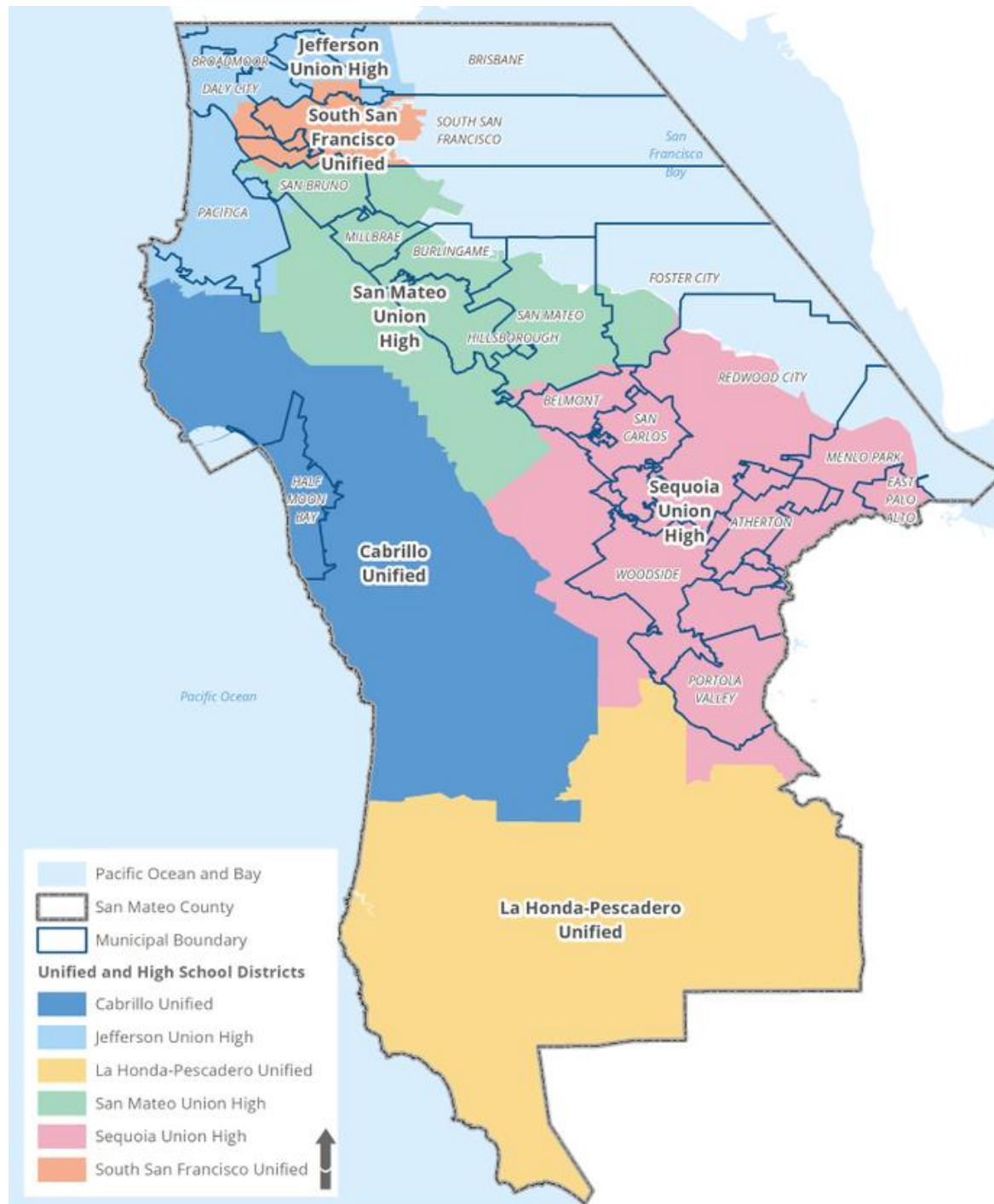
San Mateo County School Districts. There are three unified school districts in San Mateo County which include both elementary and high schools. These are **Cabrillo Unified School District**, **La Honda-Pescadero Unified School District**, and **South San Francisco Unified School District**.

In addition to the unified school districts, there are three high school districts, which include: **Jefferson Union High School District**, **San Mateo Union High School District**, and **Sequoia Union High School District**. The elementary schools covering these high schools' district boundaries areas are described below:

- In the **Jefferson Union High School District** geographic boundary, elementary school districts are the Bayshore Elementary School District, Brisbane School District, Jefferson Elementary School District, and Pacifica School District.
- Within the **San Mateo Union High School District** geographic boundary, elementary school districts include San Mateo-Foster City School District, Hillsborough City School District, Burlingame School District, San Bruno Park School District, and Millbrae School District.
- Within the **Sequoia Union High School District** geographic boundary, the elementary schools include Belmont-Redwood Shores School District, San Carlos School District, Redwood City School District, Ravenswood City School District, Menlo Park City School District, Woodside Elementary School District, Las Lomas Elementary School District, and Portola Valley School District.

Geographic boundaries of school districts. Figure V-1 illustrates the geographic boundaries of the unified school districts as well as the three high school districts. Municipal boundaries are overlaid on the map.

Figure V-1.
Unified School Districts and High School Districts in San Mateo County



Source: San Mateo County Office of Education.

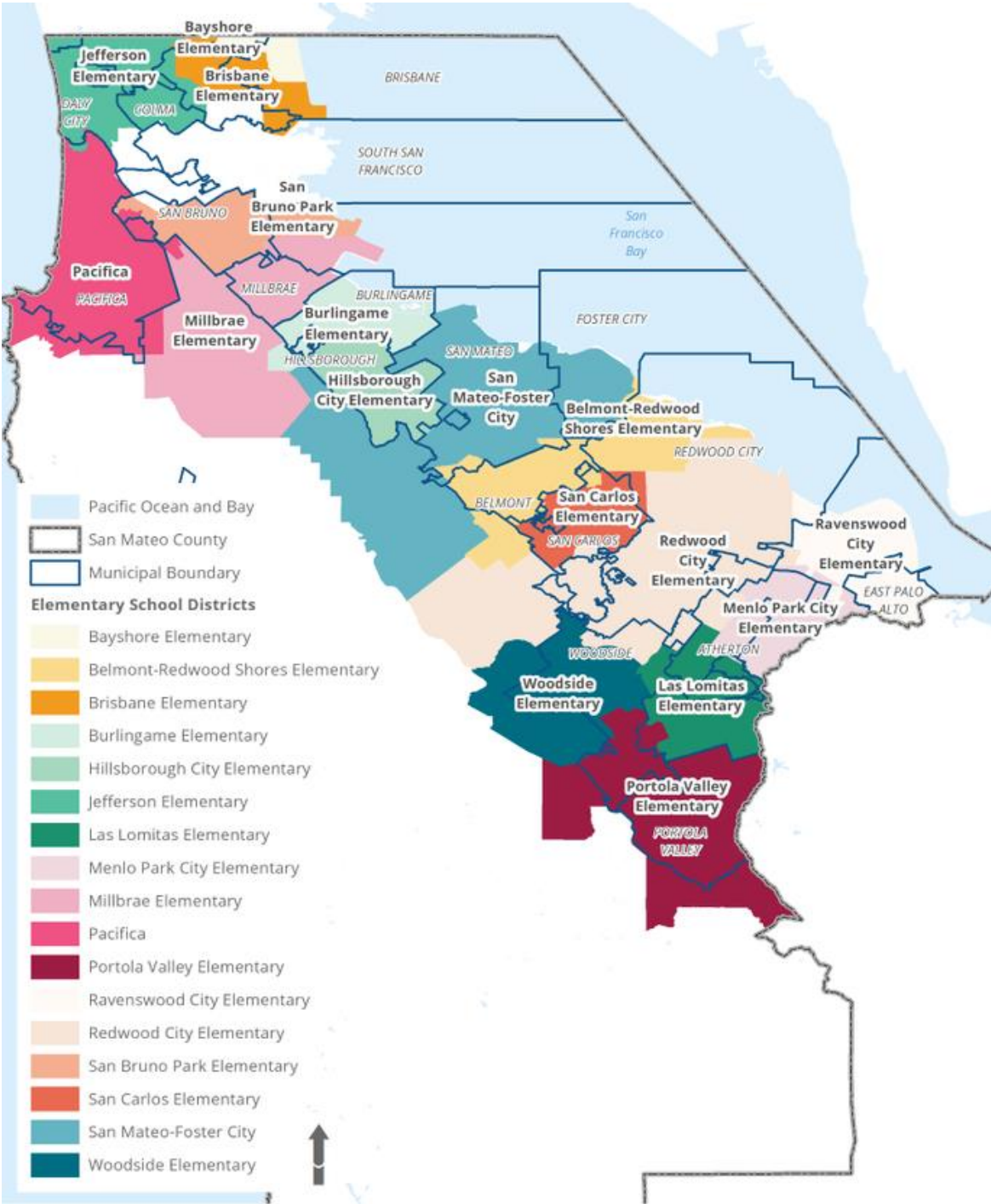
As illustrated in the map, Cabrillo Unified School District covers Half Moon Bay and some unincorporated areas of San Mateo County. South San Francisco Unified covers South San

Francisco and a small portion of Daly City. La Honda-Pescadero Unified School District covers unincorporated areas of San Mateo County.

The other high school districts, Jefferson Union, San Mateo Union, and Sequoia Union, cover the remaining jurisdictions. Jefferson Union covers Brisbane, Colma, Daly City, and Pacifica. San Mateo Union covers Burlingame, Hillsborough, Millbrae, San Bruno, San Mateo City, and Foster City. Sequoia Union covers Atherton, Belmont, Redwood City, East Palo Alto, Menlo Park, San Carlos, Portola Valley, and Woodside.

The county's elementary school districts cover the same areas as the three high school districts. Their geographic boundaries are illustrated in the map below.

Figure V-2.
Elementary School Districts in San Mateo County



Source: San Mateo County Office of Education.

Because the elementary school districts are much smaller, many jurisdictions have several elementary schools. The table below shows each jurisdiction and their associated elementary school.

Figure V-3.
School Districts in San Mateo County's Jurisdictions

Jurisdiction	Unified or High School District	Elementary School District(s)
Atherton	Sequoia Union	Menlo Park City ; Las Lomas Elementary; Redwood City
Belmont	Sequoia Union	Belmont-Redwood Shores
Brisbane	Jefferson Union	Brisbane; Bayshore Elementary
Burlingame	San Mateo Union	Burlingame
Colma	Jefferson Union	Jefferson Elementary
Daly City	Jefferson Union; South San Francisco Unified	Jefferson; Bayshore Elementary
East Palo Alto	Sequoia Union	Ravenswood City
Foster City	San Mateo Union	San Mateo-Foster City
Half Moon Bay	Cabrillo Unified	(none, included in Cabrillo Unified)
Hillsborough	San Mateo Union	Hillsborough City
Menlo Park	Sequoia Union	Menlo Park City; Las Lomas Elementary; Ravenswood City
Millbrae	San Mateo Union	Millbrae
Pacifica	Jefferson Union	Pacifica
Portola Valley	Sequoia Union	Portola Valley
Redwood City	Sequoia Union	Redwood City
San Bruno	San Mateo Union	San Bruno Park
San Carlos	Sequoia Union	San Carlos; Redwood City
San Mateo	San Mateo Union	San Mateo-Foster City
South San Francisco	South San Francisco Unified	(none, included in South San Francisco Unified)
Woodside	Sequoia Union	Woodside Elementary; Portola Valley; Las Lomas; Redwood City

Source: San Mateo County Office of Education.

A brief history of district formation. San Mateo County's numerous school districts were formed over a century ago, when the county was more rural and scattered: communities needed elementary schools close to home, and only a few students were attending high school. As young people began going to high school, individual districts often found they had too few students and resources to support their own high schools, so

separate high school districts, covering the territories of two or more elementary districts, were established to meet the communities' needs.²

Once California's population grew and San Mateo County became more urbanized, "a jigsaw puzzle of overlapping districts evolved haphazardly." Since 1920, the state has been pushing elementary districts to unify with the high school districts that serve their communities, citing improved educational quality and equity of opportunity. However, there has been limited success and local voters in San Mateo County have consistently resisted unification.³

Early efforts at unification were more successful in the rural communities along the coast—for example, voters approved the new Cabrillo Unified district for the area around Half Moon Bay and the La Honda-Pescadero Unified district in a 1964 election. Unification was not supported by many suburban communities edging the Bay. The county's school district committee proposed to split each of the three high school districts and feeder schools into two or three smaller unified districts, but the State Board of Education rejected variations of those plans three times. The Board argued that the county committee's proposals would create districts with widely varying property tax bases and could contribute to racial segregation. The State Board instead devised a plan that would create a single unified district within each of the existing high school district boundaries. Voters turned down the state plans in all three districts in June 1966, and rejected a similar proposal again in 1972. In 1973, the Mid-Peninsula Task Force for Integrated Education petitioned the county committees to unify the elementary districts of Menlo Park, Las Lomas, Portola Valley, Ravenswood and a portion of Sequoia Union High School District across county lines with Palo Alto Unified. Their goal was racial integration, but the county committee did not support the effort.⁴

Efforts against unification have persisted, leaving the county with several elementary school districts which feed into a high school, rather than a unified district. As a result, some elementary school districts have faced waning budgets and administrative hurdles. For instance, Brisbane and Bayshore elementary school districts, at the northern end of the county, serve a little more than 1,000 students and long have struggled with tight budgets. To rectify their budgetary concerns, the districts now share both a superintendent and a chief business officer. They also participate in a special education collaborative with the Jefferson elementary and high school districts.

According to the county's superintendent of schools Anne Campbell, other districts may find themselves pooling their resources in the future: local identification may be strong,

² Watson, Aleta. "How Did We End Up With 54 School Districts in San Mateo and Santa Clara Counties?" Silicon Valley Community Foundation, 2012. <https://www.siliconvalleycf.org/sites/default/files/report-edu.pdf>

³ Ibid.

⁴ Ibid.

she says, but financial reality is hard to ignore: “As we move forward in time, I think it’s going to be interesting to see what school districts are going to do, especially as budgets get more bleak.”⁵

Enrollment changes. Total public school enrollment in the county has decreased slightly, by just 1%, from the 2010-2011 academic year to 2020-2021. Figure V-4 illustrates enrollment changes by district.

Bayshore Elementary, Ravenswood City, and Portola Valley school districts experienced the largest enrollment decreases (by at least 30%) between 2010-11 and 2020-21. School districts with the largest increases in enrollments were Burlingame (22%) and Belmont-Redwood Shores (30%).

⁵ Ibid.

Figure V-4.
Enrollment changes by district, 2010-11 to 2020-2021

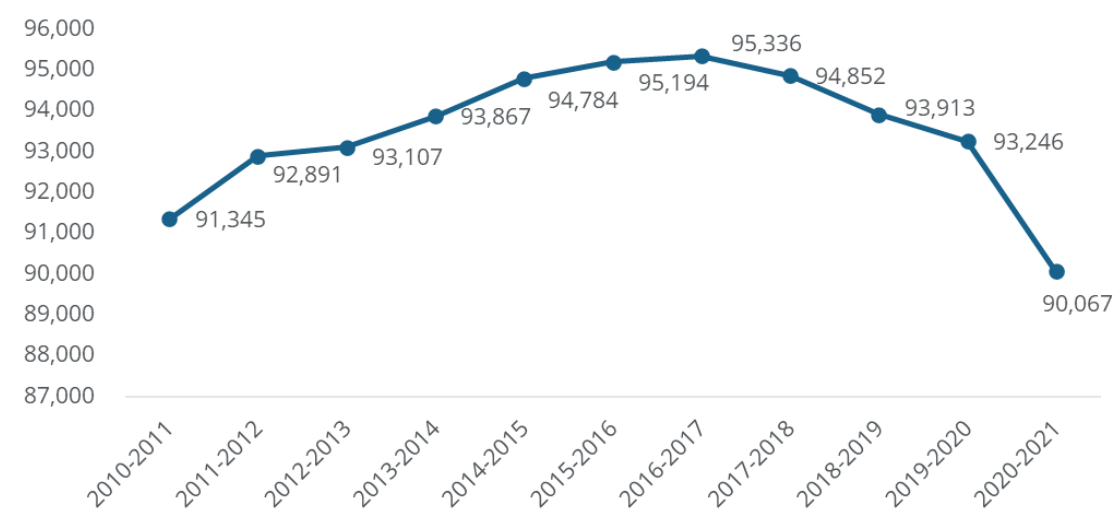
School District	2010-2011 Enrollment	2020-2021 Enrollment	Percent Change
Unified School Districts			
Cabrillo Unified	3,352	2,934	-12%
La Honda-Pescadero	341	275	-19%
South San Francisco	9,312	8,182	-12%
High & Elementary School Districts			
Jefferson Union High School	4,960	4,705	-5%
Bayshore Elementary	543	361	-34%
Brisbane Elementary	545	474	-13%
Jefferson Elementary	6,998	6,653	-5%
Pacifica	3,164	3,006	-5%
San Mateo Union High School	8,406	9,760	16%
Burlingame Elementary	2,771	3,387	22%
Hillsborough City Elementary	1,512	1,268	-16%
Millbrae Elementary	2,222	2,238	1%
San Bruno Park Elementary	2,599	2,275	-12%
San Mateo-Foster City	10,904	10,969	1%
Sequoia Union High School	8,765	10,327	18%
Belmont-Redwood Shores	3,206	4,152	30%
Las Lomas Elementary	1,336	1,116	-16%
Menlo Park City Elementary	2,629	2,781	6%
Portola Valley Elementary	711	491	-31%
Ravenswood City Elementary	4,285	2,993	-30%
Redwood City Elementary	9,119	8,086	-11%
San Carlos Elementary	3,212	3,265	2%
Woodside Elementary	453	369	-19%
Total Enrollment	91,345	90,067	-1%

Source: California Department of Education and Root Policy Research

However, it is important to note that many of these enrollment decreases were driven by the pandemic. In fact, total enrollment in these public schools decreased by 3% between

2019-2020 and 2020-2021 in San Mateo County: the largest decrease of the decade. As shown in Figure V-5, enrollments actually increased steadily from 2010-2011 to 2017-2018, then began decreasing afterwards.

Figure V-5.
Public School Enrollment Changes, 2010-2011 to 2020-2021



Note: These data exclude enrollments in SBE Everest Public High School District, which in 2015 combined with the Sequoia Union High School District.

Source: California Department of Education and Root Policy Research

Portola Valley and La Honda-Pescadero school districts had the largest enrollment decreases during COVID-19, with a 11% and 10% decline in enrollments, respectively. The only school district with increasing enrollments between the 2019-2020 to 2020-2021 school years was Sequoia Union High School District, with a modest 1% increase in enrollments.

Figure V-6.
Enrollment changes by district during COVID-19, 2019-20 to 2020-21

School District	2019-2020 Enrollment	2020-2021 Enrollment	Percent Change
Unified School Districts			
Cabrillo Unified	3,136	2,934	-6%
La Honda-Pescadero	306	275	-10%
South San Francisco	8,438	8,182	-3%
High & Elementary School Districts			
Jefferson Union High School	4,811	4,705	-2%
Bayshore Elementary	381	361	-5%
Brisbane Elementary	476	474	0%
Jefferson Elementary	6,687	6,653	-1%
Pacifica	3,110	3,006	-3%
San Mateo Union High School	9,885	9,760	-1%
Burlingame Elementary	3,534	3,387	-4%
Hillsborough City Elementary	1,290	1,268	-2%
Millbrae Elementary	2,349	2,238	-5%
San Bruno Park Elementary	2,454	2,275	-7%
San Mateo-Foster City	11,576	10,969	-5%
Sequoia Union High School	10,238	10,327	1%
Belmont-Redwood Shores	4,314	4,152	-4%
Las Lomas Elementary	1,208	1,116	-8%
Menlo Park City Elementary	2,922	2,781	-5%
Portola Valley Elementary	551	491	-11%
Ravenswood City Elementary	3,269	2,993	-8%
Redwood City Elementary	8,530	8,086	-5%
San Carlos Elementary	3,405	3,265	-4%
Woodside Elementary	376	369	-2%
Total Enrollment	93,246	90,067	-3%

Source: California Department of Education and Root Policy Research.

Declining enrollments in public schools have been common across the state and country during the COVID-19 pandemic, and enrollment declines in San Mateo County are on par

with those across the state. According to a study conducted by the Public Policy Institute of California, public K–12 enrollment declined by 3% in California from the 2019-2020 school year to the 2020-2021 school year.⁶

As funding is tied directly to the number of enrolled pupils, schools in San Mateo County could suffer fiscal consequences with continued declines. By law, districts are “held harmless” for declines for one year—that is, school budgets for 2020–2021 were unaffected, but continued enrollment declines could mean cuts in future years.⁷ Reductions in enrollments, and consequently funding, could also worsen economic inequality in the long-term by reducing students’ resources and access to opportunities.

Demographics: race & ethnicity. Over the last decade, San Mateo County’s school districts have diversified in terms of students’ race and ethnicity. Hispanic students make up the largest ethnic group in the county’s schools: 38% of students identified as Hispanic in the 2020-2021 academic school year. This is just a one percentage point increase from 2010-2011. Many other students are White (26%), though this has decreased by 3 percentage points since 2010-2011. The largest increase was in Asian students, with 17% identifying as such in 2020-2021, an increase of 5 percentage points from 2010-2011. Other students identify as Filipino (8%), or bi- or multi-racial (8%). A small and decreasing percentage of students identify as Black/African American (1%) and Pacific Islander (2%).

⁶ Lafortune, Julien & Prunty, Emmanuel. “Digging into Enrollment Drops at California Public Schools.” Public Policy Institute of California. May 14, 2021. <https://www.ppic.org/blog/digging-into-enrollment-drops-at-california-public-schools/>

⁷ Ibid.

Figure V-7.
Changes in Race and
Ethnicity, 2010-2011 to 2020-
2021

Note: These data exclude enrollments in SBE Everest Public High School District, which in 2015 combined with the Sequoia Union High School District.

Source: California Department of Education and Root Policy Research

:

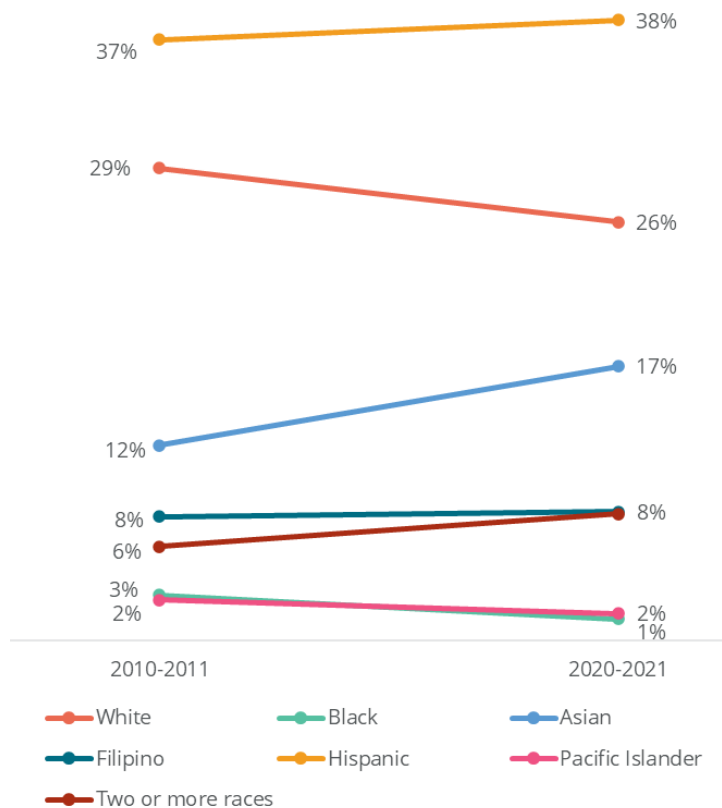


Figure V-8 shows the racial and ethnic distribution of students enrolled in public schools by jurisdiction in 2020-2021.

- Portola Valley Elementary School District (66%) and Woodside Elementary School District (64%) had the highest share of White students, making them among the least racially and ethnically diverse districts in the county.
- Ravenswood City Elementary School District and Redwood City Elementary School District had the highest share of Hispanic students, at 84% and 70%, respectively.
- Ravenswood City also had the highest proportion of Pacific Islander students (7%) and Black/African American students (5%) compared to other districts.
- Millbrae Elementary (46%), Hillsborough Elementary (32%), and Belmont-Redwood Shores Elementary (32%) had the highest share of Asian students.
- Jefferson Elementary School District and Jefferson Union High School District had the highest portion of Filipino students, at 25% and 29% respectively.

Figure V-8.
Student body by Race and Ethnicity, 2020-2021

School District	Asian	Black	Filipino	Hispanic	Pacific Islander	White	Two or more races
Unified School Districts							
Cabrillo Unified	1%	0%	1%	52%	0%	40%	5%
La Honda-Pescadero	0%	0%	1%	63%	0%	35%	1%
South San Francisco	14%	1%	23%	48%	2%	6%	6%
High & Elementary School Districts							
Jefferson Union High School	15%	1%	29%	31%	1%	14%	7%
Bayshore Elementary	19%	3%	21%	41%	4%	3%	8%
Brisbane Elementary	20%	1%	12%	28%	0%	24%	11%
Jefferson Elementary	19%	2%	25%	36%	1%	11%	5%
Pacifica	8%	1%	9%	26%	0%	39%	16%
San Mateo Union High School	23%	1%	5%	32%	2%	28%	10%
Burlingame Elementary	27%	0%	3%	16%	0%	41%	9%
Hillsborough Elementary	32%	0%	2%	5%	0%	48%	12%
Millbrae Elementary	46%	1%	6%	20%	2%	16%	8%
San Bruno Park Elementary	16%	1%	10%	41%	5%	15%	1%
San Mateo-Foster City	26%	1%	3%	37%	2%	21%	9%
Sequoia Union High School	9%	2%	1%	45%	2%	35%	5%
Belmont-Redwood Shores	32%	1%	3%	12%	1%	34%	14%
Las Lomitas Elementary	18%	1%	1%	13%	0%	53%	14%
Menlo Park City Elementary	13%	1%	1%	17%	1%	55%	11%
Portola Valley Elementary	6%	0%	0%	14%	0%	66%	13%
Ravenswood City Elementary	0%	5%	0%	84%	7%	1%	2%
Redwood City Elementary	4%	1%	1%	70%	1%	19%	4%
San Carlos Elementary	18%	1%	1%	14%	0%	49%	13%
Woodside Elementary	4%	2%	0%	16%	1%	64%	11%
Total	17%	1%	8%	38%	2%	26%	8%

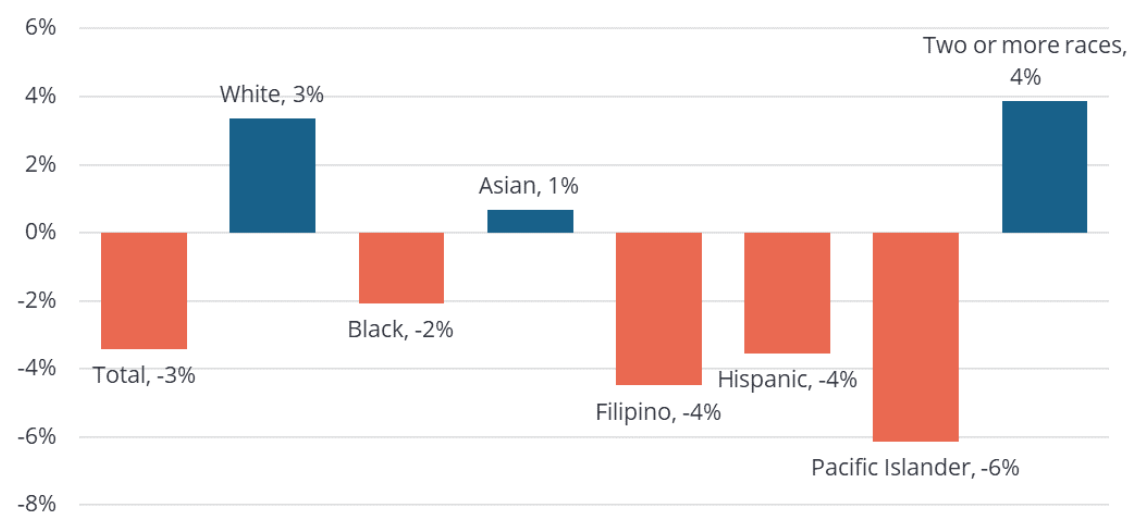
Note: In almost all school districts, less than 1% of students were Native American, so they are not included in this table.

Source: California Department of Education and Root Policy Research

Enrollment changes due to COVID-19 varied by race and ethnicity. For instance, between 2019-2021, enrollment among Pacific Islander students decreased by 6% (from 1,581 students in 2019-20 to 1,484 students in 2020-21). This is substantially higher than the 3% countywide average. Enrollments among Filipino and Hispanic students decreased by 4% while enrollment among Black/African American students decreased by 2%. On the other

end of the spectrum, there was a 3% increase in enrollment among White students (from 22,308 students to 23,055 students) between 2019-20 and 2020-21. Similarly, there was a 1% increase in enrollment among Asian students and a 4% increase among students of two or more races.

Figure V-9.
Enrollment Changes by Race and Ethnicity, San Mateo County, 2019-20 to 2020-21



Source: California Department of Education and Root Policy Research

While many of their families may have simply moved out of San Mateo County during the pandemic, it is possible that Black/African American, Filipino, Hispanic, and Pacific Islander students are otherwise slipping through the cracks of the education system during this period.

Demographics: students with extenuating circumstances. Several students in the county's public schools are facing additional hurdles to educational ease. Many are English learners, qualify for reduced lunch, are foster children, are experiencing homelessness, have a disability, or are migrants. Students in these groups often have hindrances to excelling in school because of detrimental circumstances beyond their control. These include financial and social hardships as well as problems within students' families.

Qualification for free and reduced lunch is often used as a proxy for extenuating circumstances. Qualifications are determined based on household size and income. For instance, in the 2020-2021 academic year, students from a household of three making less

than \$40,182 annually qualified for reduced price meals, and those making less than \$28,236 in a household of three qualified for free meals.⁸

Free and reduced lunch disparities. Overall, 29% of public school students in San Mateo County qualify for reduced or free lunch. This rate was substantially lower in districts like Hillsborough Elementary, San Carlos Elementary, Portola Valley Elementary, Las Lomas Elementary, Belmont-Redwood Shores, and Menlo Park City Elementary, where each had less than 10% of students qualify for free or reduced lunch.

The rate of reduced lunch qualification was far higher in Ravenswood City Elementary School District, where 83% of students qualify for reduced lunch.

Disparities in homelessness. In Ravenswood City Elementary, 30% of students are experiencing homelessness. This is an outlier in the county, where overall just 2% are experiencing homelessness. The school district has received media attention due to its astronomically high rate of students experiencing homelessness. Some have noted that rates of homelessness have increased due to escalating costs of living in an area surrounded by affluence.⁹ Others have highlighted that "Having a roof over your head, having a safe place to sleep and study, is fundamental to absolutely everything," and have noted that students who experience homelessness have higher dropout rates and are more likely to experience homelessness as adults.¹⁰

School moves related to evictions. Currently, students whose families have been evicted do not have protections allowing them to remain in their current school district. This means that precarious housing also means precarious schooling for many of the county's students. Frequent moves by students are closely related to lower educational proficiency.

In the City of San Francisco, a 2010 ordinance protects some students from being evicted during the school year; however, it only relates to owner/relative move-in evictions.¹¹ Children in families who are evicted for other reasons may need to move schools or districts when their housing is lost.

English language learners. Countywide, 20% of public school students are English learners. Again, this rate is highest at Ravenswood City Elementary, where 53% of students are English learners. La Honda-Pescadero Unified School District, Jefferson Union High

⁸ "Income Eligibility Scales for School Year 2020-2021." California Department of Education.

⁹ Bartley, Kaitlyn. "Homelessness: The shadow that hangs over students in this Bay Area school district." The Mercury News. December 2018.

¹⁰ Jones, Carolyn. "California schools see big jump in homeless students." Palo Alto Online. October 2020.

¹¹ <https://sfrb.org/new-amendment-prohibiting-owner-move-evictions-minor-children-during-school-year>

School, and Redwood City Elementary also have high rates of English learners, representing more than a third of students.

Less than one percent of students in San Mateo County public school districts are foster youth or migrants. Cabrillo Unified School District had the highest rate of migrant students at 3%. La Honda-Pescadero had the highest rate of foster children at 2%.

School districts without large low income populations also tend to serve very few English language learners. For instance, in Hillsborough Elementary where 0% of students qualify for reduced lunch, only 1% of students are English language learners.

Figure V-10.
Students with Extenuating Circumstances, 2020-2021

School District	English Learners	Reduced Lunch	Foster Children	Homeless	Migrant
Unified School Districts					
Cabrillo Unified	20%	37%	0%	2%	3%
La Honda-Pescadero	38%	38%	2%	1%	1%
South San Francisco	21%	34%	0%	1%	1%
High & Elementary School Districts					
Jefferson Union High School	36%	44%	0%	0%	0%
Bayshore Elementary	30%	57%	0%	0%	0%
Brisbane Elementary	16%	19%	0%	0%	0%
Jefferson Elementary	14%	27%	0%	1%	0%
Pacifica	9%	18%	0%	1%	0%
San Mateo Union High School	10%	21%	0%	0%	0%
Burlingame Elementary	13%	11%	0%	0%	0%
Hillsborough Elementary	1%	0%	0%	0%	0%
Millbrae Elementary	19%	25%	0%	0%	0%
San Bruno Park Elementary	29%	18%	0%	0%	0%
San Mateo-Foster City	26%	28%	0%	2%	0%
Sequoia Union High School	15%	30%	0%	0%	0%
Belmont-Redwood Shores	10%	7%	0%	0%	0%
Las Lomas Elementary	7%	6%	0%	0%	0%
Menlo Park City Elementary	6%	7%	0%	0%	0%
Portola Valley Elementary	4%	5%	0%	0%	0%
Ravenswood City Elementary	53%	83%	0%	30%	0%
Redwood City Elementary	38%	56%	0%	2%	1%
San Carlos Elementary	5%	6%	0%	0%	0%
Woodside Elementary	8%	10%	0%	0%	0%
Total	20%	29%	<1%	2%	<1%

Source: California Department of Education and Root Policy Research

The overall share of students in these groups has not changed drastically over time. As shown in Figure V-11, there have been slight decreases in the share of students who are English learners and the share of students who qualify for reduced lunch from 2016-2017

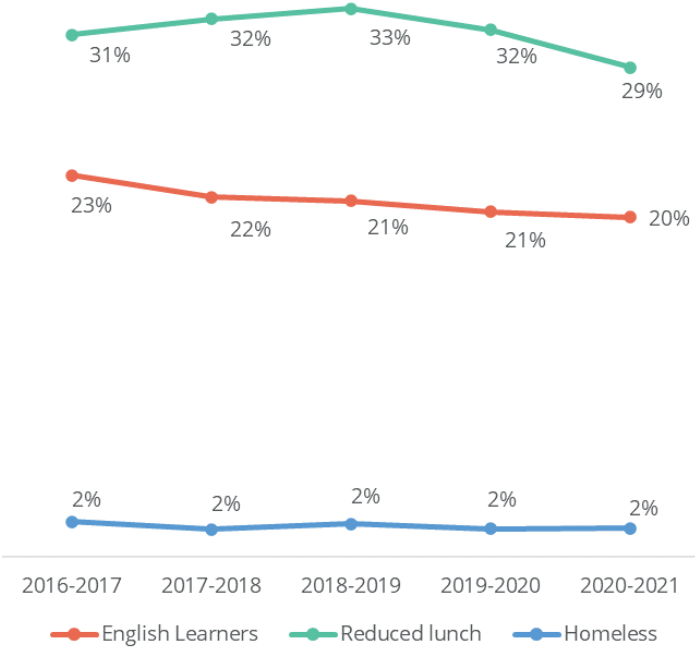
to 2020-2021. Around 2% of students in the county are homeless and this has not changed between 2016-2017 and 2020-2021. Foster youth and migrant students are not shown in the figure, as both have hovered at less than 1% from year to year.

Figure V-11.
Changes in rates of English
Leaners, Reduced Lunch,
and Homelessness, 2016-
2017 to 2020-2021

Note: These data exclude enrollments in SBE Everest Public High School District, which in 2015 combined with the Sequoia Union High School District.

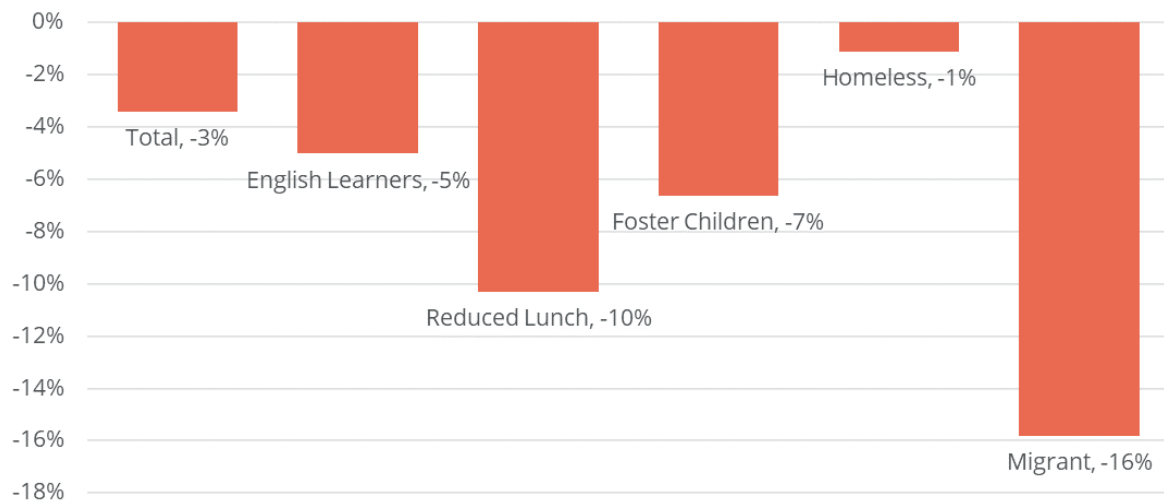
Source: California Department of Education and Root Policy Research

:



During COVID-19, enrollments decreased by 3% between 2019-2020 and 2020-2021 school years, as families withdrew or did not reenroll their children from public schools. Enrollment among migrant students decreased much more drastically, by 16% (from 332 students to 279 students). Similarly, enrollment among students who qualify for reduced lunch declined at a higher rate (10%) than the overall student population. Foster children and English learners also experienced enrollment decreases at a rate higher than the total population, with 7% and 10% decreases in enrollment, respectively.

Figure V-12.
Enrollment Changes by Extenuating Circumstance, San Mateo County,
2019-2020 to 2020-2021



Source: California Department of Education and Root Policy Research

Achievement Gaps

This section details achievement gaps within school districts. Gaps are measured by test scores, meeting California State University or University of California admissions standards, and college-going rates.

Test scores. Figure V-13 indicates the percent of students who met or exceeded English and mathematics testing standards set by the California State Assessment of Student Performance and Progress. Overall, 62% of students in the county met or exceeded English testing standards and 52% met or exceeded mathematics testing standards.

Of all the districts with high schools, San Mateo Union High School District had the highest student pass rates: 70% of their students met or exceeded standards in English testing and 50% met or exceeded standards in mathematics testing.

Among elementary school districts, Portola Valley Elementary School District and Woodside Elementary School District had the highest rates of success in English, with 87% and 88% of students meeting or exceeding English testing standards, respectively. Woodside Elementary School District and Hillsborough Elementary School District had the highest rates of success in mathematics, with 84% and 85% meeting math testing standards, respectively.

In every school district, girls scored higher on English tests than boys. Overall, girls met or exceeded English testing at a rate of 67% while boys met or exceeded English testing at a rate of 57%. The largest gender gap was in Brisbane Elementary School District, where 72%

of girls met or exceeded English testing standards and just 56% of boys did: a gap of 16 percentage points.

Gender gaps in mathematics were less pronounced, but largest gender gaps were in Cabrillo Unified School District and in La Honda Pescadero Unified School District. In Cabrillo Unified, girls passed mathematics at a rate 7% higher than boys, while in La Honda-Pescadero, boys passed at a rate 6% higher than girls.

Figure V-14.
Students who Met or Exceeded Testing Standards, by Gender and District, 2018-2019

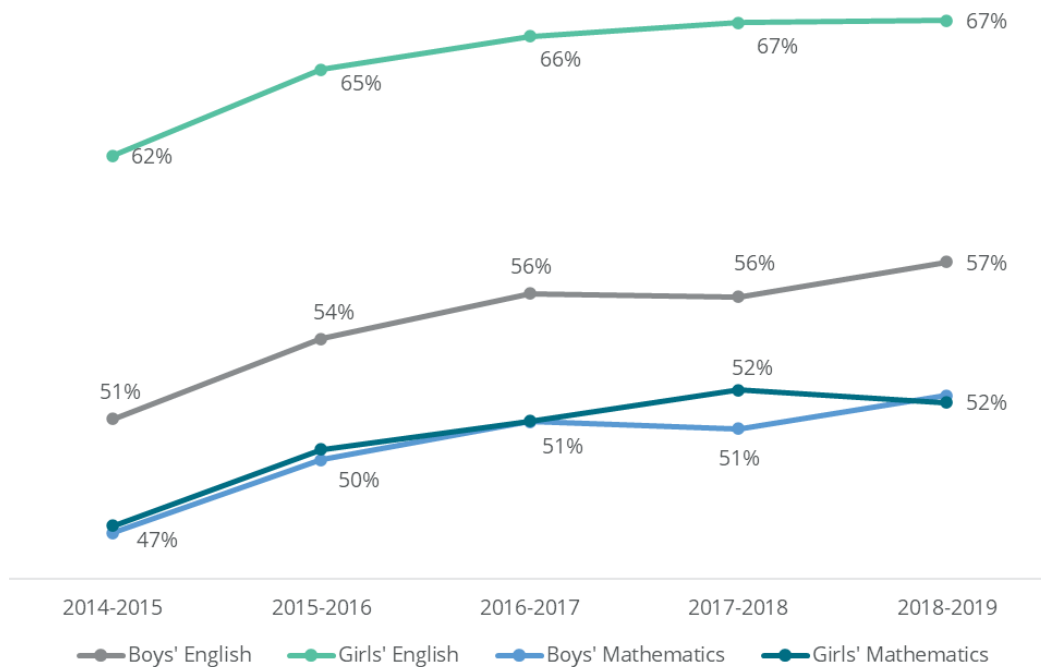
District	English Language Arts/Literacy			Mathematics		
	Total	Boys	Girls	Total	Boys	Girls
Unified School Districts						
Cabrillo Unified	48%	41%	55%	34%	31%	38%
La Honda-Pescadero	43%	36%	49%	31%	34%	28%
South San Francisco	52%	45%	60%	44%	42%	45%
High & Elementary School Districts						
Jefferson Union High School	57%	52%	63%	37%	38%	35%
Bayshore Elementary	27%	24%	31%	27%	27%	28%
Brisbane Elementary	64%	56%	72%	54%	56%	53%
Jefferson Elementary	48%	43%	54%	37%	39%	35%
Pacifica	60%	55%	65%	57%	57%	57%
San Mateo Union High School	70%	66%	76%	50%	50%	50%
Burlingame Elementary	80%	75%	84%	78%	78%	78%
Hillsborough Elementary	85%	81%	89%	85%	86%	84%
Millbrae Elementary	63%	57%	70%	58%	58%	58%
San Bruno Park Elementary	50%	47%	53%	41%	43%	38%
San Mateo-Foster City	62%	58%	67%	56%	56%	56%
Sequoia Union High School	68%	64%	72%	50%	50%	50%
Belmont-Redwood Shores	82%	78%	86%	79%	78%	80%
Las Lomitas Elementary	86%	84%	88%	82%	84%	80%
Menlo Park City Elementary	84%	81%	87%	83%	82%	83%
Portola Valley Elementary	87%	83%	91%	83%	84%	82%
Ravenswood City Elementary	22%	20%	23%	15%	16%	13%
Redwood City Elementary	54%	49%	59%	46%	46%	46%
San Carlos Elementary	80%	77%	83%	75%	76%	74%
Woodside Elementary	88%	85%	91%	84%	85%	83%
Total	62%	57%	67%	52%	52%	52%

Source: California Department of Education, California Assessment of Student Performance and Progress, and Root Policy Research

The gender gap in test scores has started to close in recent years, as indicated in Figure V-15. In 2014-2015 there was a 11 percentage point gap in girls' and boys' English testing pass

rates, and by 2018-2019 this was just a 10 percentage point gap. The figure also indicates that there have been steady gains in the share of students meeting or exceeding testing standards in the county.

Figure V-15.
Students who Met or Exceeded Testing Standards, by Gender, 2014-2015 to 2018-2019



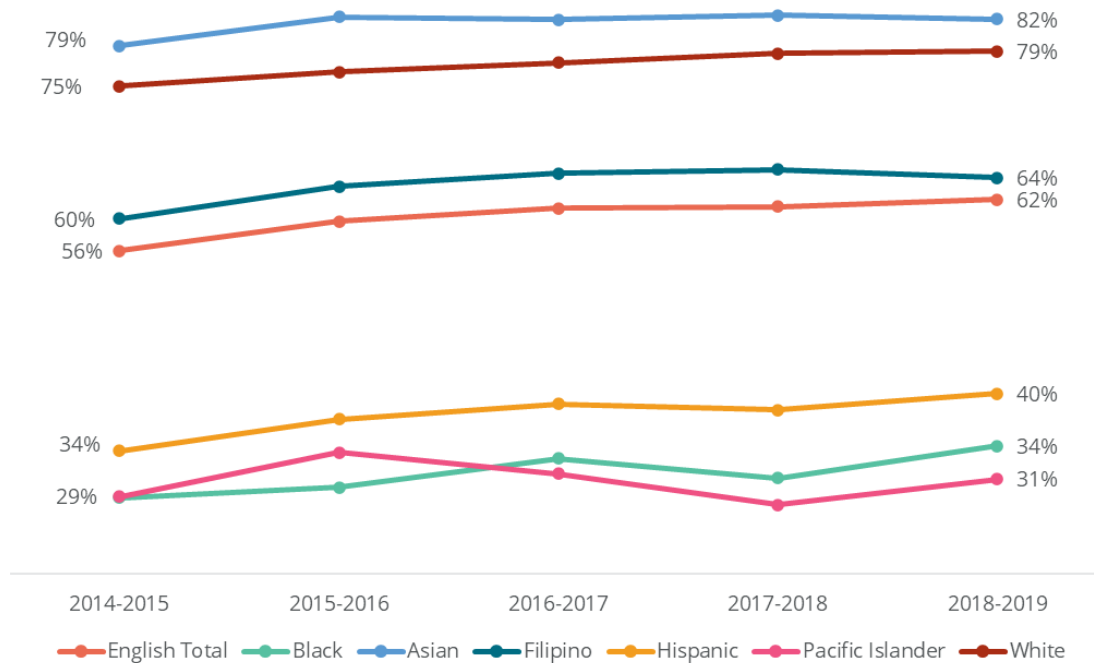
Source: California Department of Education, California Assessment of Student Performance and Progress, and Root Policy Research

Very large gaps in test scores by race and ethnicity exist among students in some areas. Figure V-16 illustrates the rate at which students of various racial and ethnic groups met or exceeded English testing standards.

For the past five years in San Mateo County, Asian, White, and Filipino students have met or exceeded English testing standards at rates higher than the overall student population. Hispanic, Black/African American, and Pacific Islander students, on the other hand, have been underserved in this realm and have consistently scored lower than the overall student body.

However, across all groups, the rate at which students met or exceed English testing standards has increased since the 2014-2015 school year. Hispanic students have made the largest percentage point gain: 34% met standards in 2014-2015 and 40% met standards in 2019-19, an increase of six percentage points.

Figure V-16.
Students who Met or Exceeded English Testing Standards, by Race and Ethnicity, 2014-2015 to 2018-2019

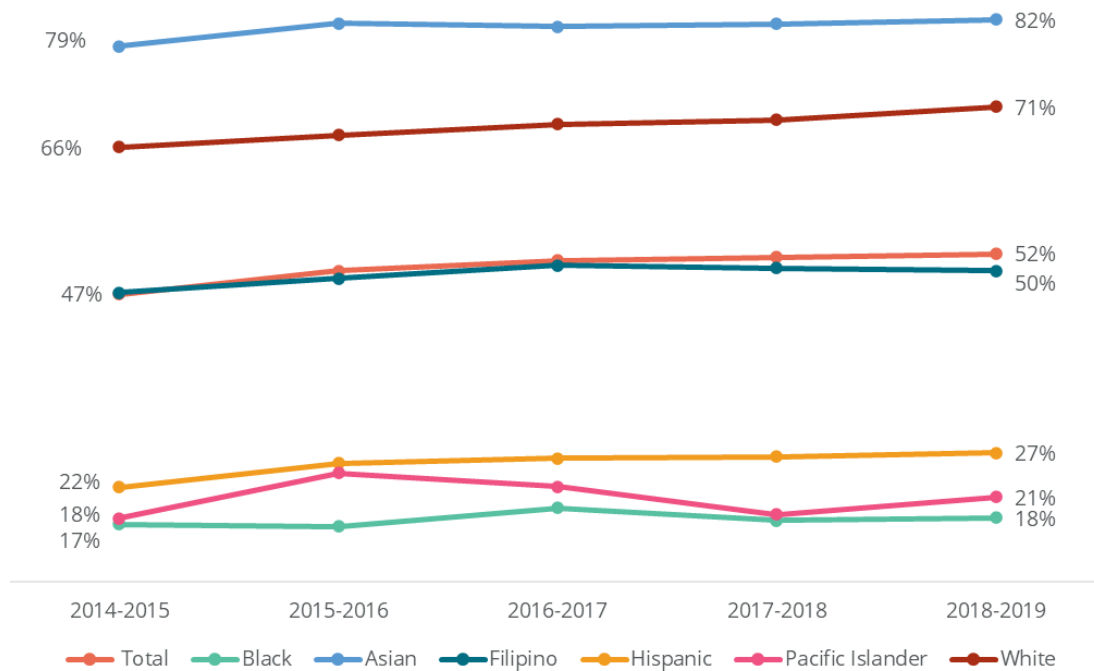


Source: California Department of Education, California Assessment of Student Performance and Progress, and Root Policy Research

A similar narrative holds in Math testing standards, where scores have improved among each racial and ethnic group from 2014-2015 to 2018-2019. Again, White and Asian students meet or exceed math testing standards at rates higher than the overall population while Hispanic, Pacific Islander, and Black/African American students scored lower.

White and Hispanic students have seen the biggest increases in rates of mathematics success: both have experienced a five percentage point increase in the percent of students who met or exceeded math testing standards.

Figure V-17.
Students who Met or Exceeded mathematics testing standards, by Race and Ethnicity, 2014-2015 to 2018-2019



Source: California Department of Education, California Assessment of Student Performance and Progress, and Root Policy Research

Figure V-18 illustrates the rates at which students of various racial and ethnic groups met or exceeded mathematics testing standards by district.

There were several districts in which the gaps between the overall test pass rates and a specific racial groups' pass rates were especially wide. For instance, in San Carlos Elementary School District, 75% of the total student body met or exceeded math testing standards, but only 11% of Black/African American students met or exceeded math testing standards—a gap of 64 percentage points.

Other school districts with wide gaps between Black/African American and overall math testing success were Las Lomas Elementary (46 percentage point gap), Menlo Park City Elementary (43 percentage point gap), and Belmont-Redwood Shores (42 percentage point gap).

Some school districts also had similar gaps in Pacific Islander students' math passing rates and overall passing rates. For instance, in Menlo Park City Elementary School District, 83% of the student body met or exceeded mathematics testing standards but just 35% of Pacific Islander students passed or exceeded mathematics testing standards—a gap of 48

percentage points. Millbrae Elementary School District also had a 47 percentage point gap between Pacific Islander students' and total students' math test rates.

Figure V-18.
Students who Met or Exceeded Mathematics Testing Standards, by
Race/Ethnicity and District, 2018-2019

School District	Overall	Asian	Black	Filipino	Hispanic	Pacific Islander	White
Unified School Districts							
Cabrillo Unified	34%	65%	(no data)	38%	16%	(no data)	54%
La Honda-Pescadero	31%	(no data)	(no data)	(no data)	20%	(no data)	46%
South San Francisco	44%	75%	19%	60%	29%	33%	46%
High & Elementary School Districts							
Jefferson Union High School	37%	75%	(no data)	36%	17%	(no data)	42%
Bayshore Elementary	27%	44%	(no data)	38%	17%	14%	(no data)
Brisbane Elementary	54%	67%	(no data)	65%	38%	(no data)	60%
Jefferson Elementary	37%	61%	15%	42%	23%	20%	30%
Pacifica	57%	74%	38%	48%	38%	(no data)	66%
San Mateo Union High School	50%	84%	(no data)	46%	22%	20%	63%
Burlingame Elementary	78%	92%	53%	66%	50%	(no data)	81%
Hillsborough Elementary	85%	92%	(no data)	(no data)	76%	(no data)	82%
Millbrae Elementary	58%	75%	31%	63%	27%	11%	51%
San Bruno Park Elementary	41%	69%	23%	64%	25%	27%	50%
San Mateo-Foster City	56%	87%	30%	61%	23%	27%	69%
Sequoia Union High School	50%	81%	18%	53%	22%	11%	76%
Belmont-Redwood Shores	79%	92%	37%	77%	52%	43%	79%
Las Lomas Elementary	82%	93%	36%	(no data)	44%	(no data)	87%
Menlo Park City Elementary	83%	94%	40%	(no data)	55%	35%	88%
Portola Valley Elementary	83%	89%	(no data)	(no data)	56%	(no data)	89%
Ravenswood City Elementary	15%	(no data)	9%	(no data)	15%	11%	(no data)
Redwood City Elementary	46%	92%	22%	76%	34%	44%	75%
San Carlos Elementary	75%	91%	11%	85%	51%	(no data)	78%
Woodside Elementary	84%	92%	(no data)	(no data)	52%	(no data)	89%
Total	52%	82%	18%	50%	27%	21%	71%

Source: California Department of Education, California Assessment of Student Performance and Progress, and Root Policy Research

Although racial gaps in English testing were less pronounced, San Carlos Elementary School District also had a wide gap between the total student body and Black/African American

students. Namely, 80% of the student body met or exceeded English testing standards, but only 19% of Black/African American students met or exceeded testing standards—a 61 percentage point gap. Las Lomas Elementary had a 41 percentage point gap between overall English testing success and Black/African American English testing success.

Other districts had large gaps between the total student body's English test scores and Pacific Islander students' test scores. Namely, in Menlo Park City Elementary School District 84% of students met or exceeded English testing standards, but only 40% of Pacific Islander students—a 44 percentage point gap.

Figure V-19.
Students who Met or Exceeded English Testing Standards, by
Race/Ethnicity and District, 2018-2019

School District	Overall	Asian	Black	Filipino	Hispanic	Pacific Islander	White
Unified School Districts							
Cabrillo Unified	48%	78%	(no data)	54%	28%	(no data)	71%
La Honda-Pescadero	43%	(no data)	(no data)	(no data)	27%	(no data)	61%
South San Francisco	52%	76%	36%	66%	38%	44%	56%
High & Elementary School Districts							
Jefferson Union High School	57%	81%	(no data)	60%	43%	(no data)	59%
Bayshore Elementary	27%	49%	(no data)	33%	20%	14%	(no data)
Brisbane Elementary	64%	63%	(no data)	75%	51%	(no data)	79%
Jefferson Elementary	48%	62%	28%	59%	34%	33%	43%
Pacifica	60%	65%	32%	52%	45%	(no data)	68%
San Mateo Union High School	70%	88%	55%	79%	50%	34%	81%
Burlingame Elementary	80%	88%	61%	73%	55%	(no data)	83%
Hillsborough Elementary	85%	89%	(no data)	(no data)	77%	(no data)	83%
Millbrae Elementary	63%	74%	46%	68%	42%	23%	61%
San Bruno Park Elementary	50%	72%	39%	76%	36%	31%	56%
San Mateo-Foster City	62%	85%	41%	68%	34%	37%	77%
Sequoia Union High School	68%	87%	44%	92%	47%	31%	88%
Belmont-Redwood Shores	82%	91%	44%	81%	64%	61%	83%
Las Lomas Elementary	86%	91%	45%	(no data)	65%	(no data)	89%
Menlo Park City Elementary	84%	92%	60%	(no data)	62%	40%	88%
Portola Valley Elementary	87%	92%	(no data)	(no data)	58%	(no data)	93%
Ravenswood City Elementary	22%	(no data)	24%	(no data)	21%	18%	(no data)
Redwood City Elementary	54%	91%	35%	73%	43%	47%	83%
San Carlos Elementary	80%	90%	19%	76%	60%	(no data)	83%
Woodside Elementary	88%	92%	(no data)	(no data)	58%	(no data)	92%
Total	62%	82%	34%	64%	40%	31%	79%

Source: California Department of Education, California Assessment of Student Performance and Progress, and Root Policy Research

Students with extenuating circumstances across all districts met or exceeded testing standards at lower rates. However, some districts had especially wide disparities between overall test scores and test scores of students with extenuating circumstances.

For example, English learning students in Portola Valley Elementary, Woodside Elementary, Menlo Park City Elementary, and Brisbane Elementary each met or exceeded mathematics test standards at a rate at least 50 percentage points below the overall test rate in each district. English learning students in Las Lomas Elementary (54%) had the highest mathematics pass rates, followed by those in Belmont-Redwood Shores (42%) and Burlingame Elementary (40%).

Students with disabilities scored especially high on mathematics tests in Hillsborough Elementary, where 48% met or exceeded standards. Others in Belmont-Redwood Shores (43%) and Woodside Elementary (41%) had high pass rates as well. Students with disabilities in San Carlos Elementary and Las Lomas Elementary school districts scored far below the overall student body: in these districts, students with disabilities met or exceeded mathematics test standards at 54 percentage points below the overall test rate.

In Jefferson Elementary and Ravenswood Elementary students experiencing homelessness passed math tests at a rate similar to their housed peers. In other districts, however, students experiencing homelessness often scored substantially lower. School districts with the widest math testing gaps between the overall student body and students experiencing homelessness were San Mateo-Foster City and Millbrae Elementary, with a 41 percentage point gap and 42 percentage point gap, respectively.

Figure V-20.
Students who Met or Exceeded Math Testing Standards, by Special Case
and District, 2018-2019

School District	Overall	English Learners	Experiencing homelessness	Migrant	With Disabilities
Unified School Districts					
Cabrillo Unified	34%	4%	5%	4%	9%
La Honda-Pescadero	31%	4%	(no data)	(no data)	2%
South San Francisco	44%	20%	25%	4%	18%
High & Elementary School Districts					
Jefferson Union High School	37%	5%	(no data)	(no data)	6%
Bayshore Elementary	27%	11%	(no data)	(no data)	9%
Brisbane Elementary	54%	4%	(no data)	(no data)	12%
Jefferson Elementary	37%	15%	36%	(no data)	11%
Pacifica	57%	22%	(no data)	(no data)	17%
San Mateo Union High School	50%	10%	(no data)	(no data)	13%
Burlingame Elementary	78%	40%	(no data)	(no data)	29%
Hillsborough Elementary	85%	(no data)	(no data)	(no data)	48%
Millbrae Elementary	58%	26%	16%	(no data)	25%
San Bruno Park Elementary	41%	12%	(no data)	(no data)	9%
San Mateo-Foster City	56%	11%	15%	(no data)	14%
Sequoia Union High School	50%	3%	33%	(no data)	9%
Belmont-Redwood Shores	79%	42%	(no data)	(no data)	43%
Las Lomas Elementary	82%	54%	(no data)	(no data)	28%
Menlo Park City Elementary	83%	31%	(no data)	(no data)	38%
Portola Valley Elementary	83%	14%	(no data)	(no data)	39%
Ravenswood City Elementary	15%	5%	11%	(no data)	2%
Redwood City Elementary	46%	14%	(no data)	29%	14%
San Carlos Elementary	75%	24%	(no data)	(no data)	21%
Woodside Elementary	84%	27%	(no data)	(no data)	41%

Source: California Department of Education, California Assessment of Student Performance and Progress, and Root Policy Research

Students with extenuating circumstances also consistently scored lower in English testing than the overall student body.

For instance, English learning students in San Mateo Union High School District, Hillsborough Elementary School District, Sequoia Union High School District, Menlo Park City Elementary School District, and Portola Valley Elementary School District met or exceeded English test standards at a rate at least 60 percentage points below the overall test rate in each district. Hillsborough Elementary had the largest gap at 85 percentage points. Las Lomas Elementary had the highest success rate among English learners, where 50% met or exceeded English testing standards.

However, students with disabilities in Las Lomas Elementary and San Carlos Elementary school districts met or exceeded English test standards at rate 55 and 51 percentage points below the overall test rate, respectively. These were the largest gaps in the county. Students with disabilities at Woodside Elementary did the best on English testing, where 56% passed or exceeded standards.

Among students experiencing homelessness, those at Sequoia Union High School were most likely to meet English testing standards, with 42% meeting or exceeding standards. The school district with the widest gap between overall English test scores and scores among students experiencing homelessness was Cabrillo Unified with a 34 percentage point gap.

Just three districts reported English testing scores among migrant students. Redwood City Elementary had the highest pass rate at 34% and Cabrillo Unified had the lowest at 16%.

Figure V-21.
Students who Met or Exceeded English Testing Standards, by Special Case
and District, 2018-2019

School District	Overall	English Learners	Experiencing homelessness	Migrant	With Disabilities
Unified School Districts					
Cabrillo Unified	48%	9%	14%	16%	12%
La Honda-Pescadero	43%	9%	(no data)	(no data)	9%
South San Francisco	52%	21%	35%	20%	18%
High & Elementary School Districts					
Jefferson Union High School	57%	3%	(no data)	(no data)	19%
Bayshore Elementary	27%	3%	(no data)	(no data)	4%
Brisbane Elementary	64%	21%	(no data)	(no data)	16%
Jefferson Elementary	48%	16%	30%	(no data)	15%
Pacifica	60%	12%	(no data)	(no data)	15%
San Mateo Union High School	70%	11%	(no data)	(no data)	27%
Burlingame Elementary	80%	33%	(no data)	(no data)	33%
Hillsborough Elementary	85%	(no data)	(no data)	(no data)	47%
Millbrae Elementary	63%	19%	34%	(no data)	23%
San Bruno Park Elementary	50%	14%	(no data)	(no data)	12%
San Mateo-Foster City	62%	9%	33%	(no data)	15%
Sequoia Union High School	68%	8%	42%	(no data)	27%
Belmont-Redwood Shores	82%	31%	(no data)	(no data)	45%
Las Lomitas Elementary	86%	51%	(no data)	(no data)	31%
Menlo Park City Elementary	84%	21%	(no data)	(no data)	42%
Portola Valley Elementary	87%	17%	(no data)	(no data)	37%
Ravenswood City Elementary	22%	6%	16%	(no data)	5%
Redwood City Elementary	54%	13%	(no data)	34%	16%
San Carlos Elementary	80%	29%	(no data)	(no data)	28%
Woodside Elementary	88%	18%	(no data)	(no data)	56%

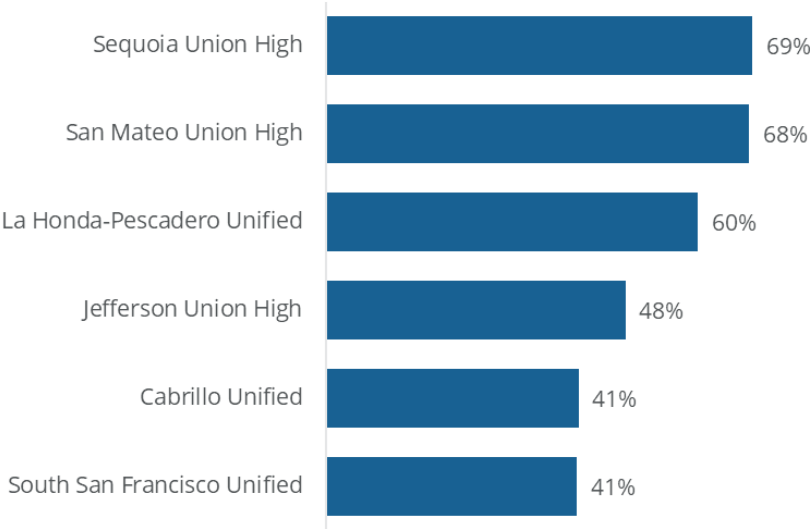
Source: California Department of Education, California Assessment of Student Performance and Progress, and Root Policy Research

Students who met university requirements. Many high schoolers in the county met admission standards for a University of California (UC) or California State University (CSU) school. Figure V-22 illustrates the percentage of cohort graduates who met admission requirements for a CSU or UC school according to California Department of Education data.

Of the high school districts in San Mateo County, Sequoia Union had the highest rate of graduates who met such admission standards, at 69%. On the other end of the spectrum, Cabrillo Unified and South San Francisco Unified had the lowest rates at 41%.

Figure V-22.
Students Meeting
California University
Admission
Standards, 2019-
2020

Source:
California Department of Education
and Root Policy Research.



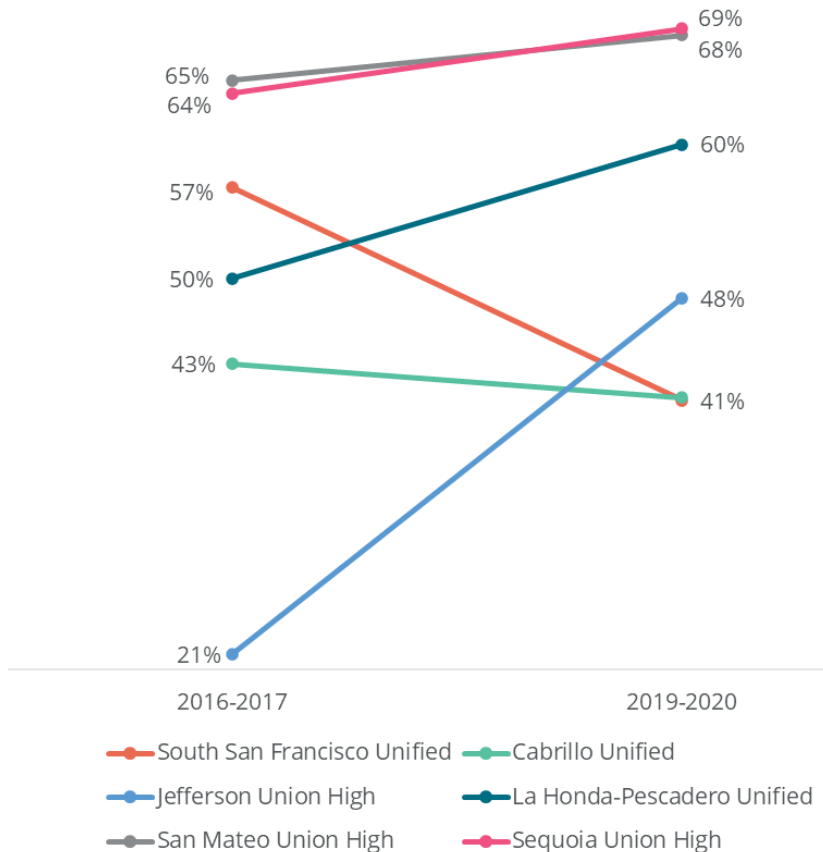
Cabrillo Unified and South San Francisco Unified have experienced a decrease in the share of graduates meeting CSU or UC admission standards in recent years. For instance, in 2016-2017, 57% of South San Francisco Unified graduates met these standards, but this decreased by 16 percentage points by 2019-2020. Cabrillo Unified experienced a less drastic decrease over the same period, but the rate still shrunk by two percentage points.

Jefferson Union High School District had the most drastic increase in the share of graduates meeting CSU or UC standards: just 21% of students met these standards in 2016-2017 compared to 48% of students in 2019-2020. La Honda-Pescadero Unified School District experienced a 10 percentage point increase in this success rate over the same period.

Sequoia Union and San Mateo Union experienced more modest increases, but remain the districts with the highest rates of students meeting CSU and UC standards.

**Figure V-23.
Students Meeting
University
Admission
Standards, 2016-
2017 and 2019-2020**

Source:
California Department of Education
and Root Policy Research.



Rates at which students met CSU or UC admissions standards varied substantially by race and ethnicity in 2019-2020. In all high school districts in San Mateo County, White and Asian students meet CSU and UC admissions standards at higher rates than the overall student population.

The largest gap is in South San Francisco Unified, where just 41% of students meet CSU or UC admissions standards, but 73% of Asian students meet those standards—a 32 percentage point gap.

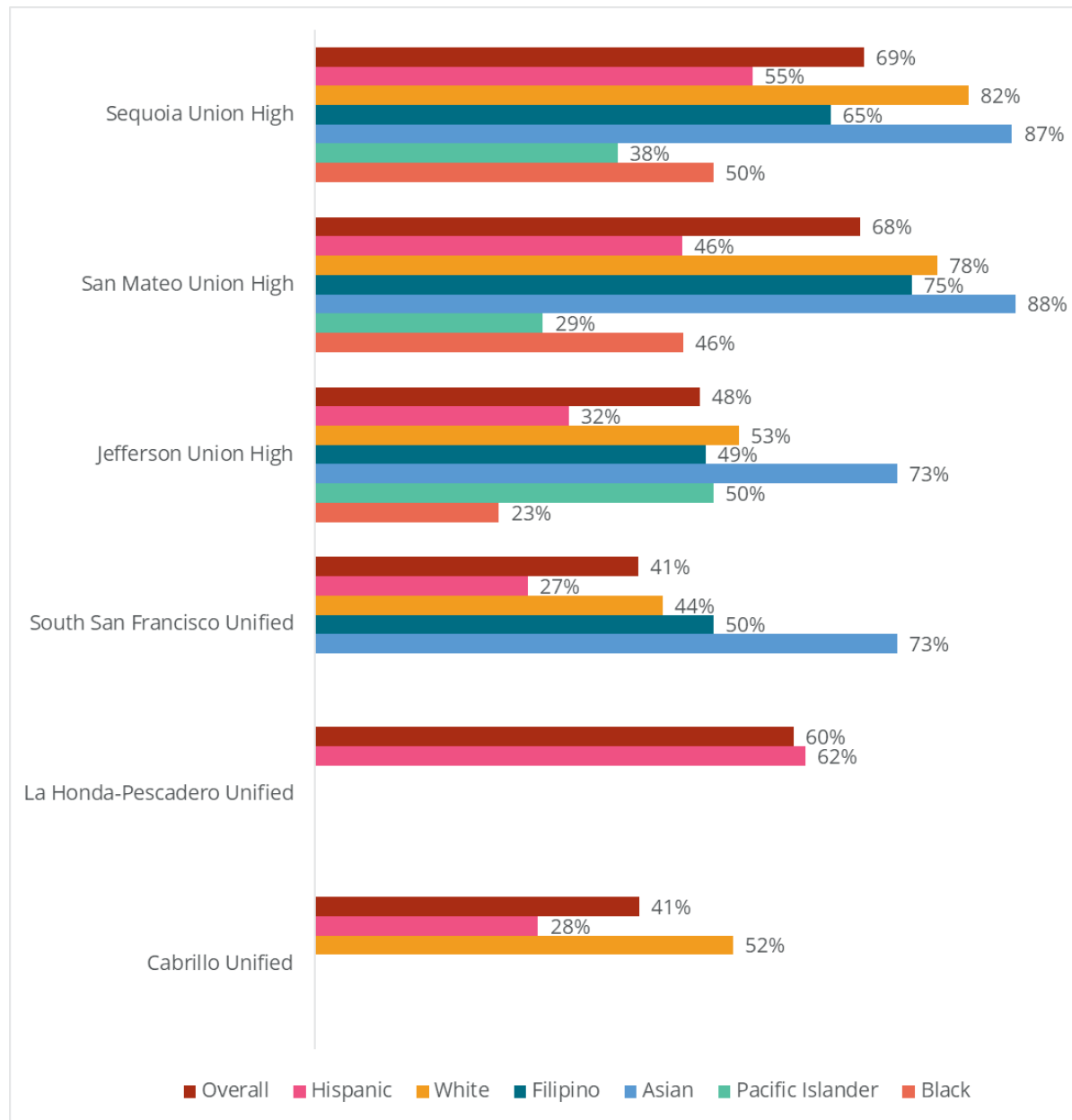
On the other end of the spectrum, Black/African American students typically met CSU or UC admissions standards at lower-than-average rates. The largest gap was in San Mateo Union, where just 29% of Black/African American students met CSU or UC standards compared to 68% of students in the district overall.

Filipino students typically met admissions standards at rates similar to the overall student body. For instance, in Jefferson Union, San Mateo Union, and South San Francisco Unified, Filipino students are slightly more likely to have met CSU and UC standards than the overall student population. In Sequoia Union, they are slightly less likely to have met admission standards than the overall student population.

In La Honda-Pescadero, Hispanic students are slightly more likely to have met CSU or UC standards than the overall student body. However, in all other school districts, Hispanic students are less likely to have met CSU and UC standards than the overall student body. The largest disparity is in San Mateo Union, where just 46% of Hispanic students meet the university admissions standards compared to 68% of students overall.

Finally, Pacific Islander students in Jefferson Union were slightly more likely to have met California university admissions standards compared to the overall student body, but in Sequoia Union and San Mateo Union they were substantially less likely.

Figure V-24.
Students Meeting University Admission Standards, by Race and Ethnicity,
2019-2020



Source: California Department of Education and Root Policy Research

As expected, students with extenuating circumstances were less likely to meet CSU or UC admissions standards than students in the county overall. In all school districts where data are available, students with disabilities, students experiencing homelessness, English learners, foster youth, and migrant students met CSU or UC admission standards at lower rates than the overall student population.

English learners in Sequoia Union and San Mateo Regional met CSU or UC admission standards at higher rates than their peers in other school districts. However, compared to the overall student body within their own school districts, they had a larger gap than other districts. Namely, in Sequoia Union, 69% of students met admissions standards compared to just 32% of students learning English— a 37 percentage point gap.

Similarly, students with disabilities in Sequoia Union had the highest rate of meeting admissions standards (31%) compared to peers with disabilities in other districts, but also had the largest gap (38 percentage points) compared to the district's overall student body.

Migrant students met admission standards at the lowest rate in South San Francisco Unified (27%) and at the highest rate in Sequoia Union (45%). However, in Cabrillo Unified, their rates were only eight percentage points lower than that of the overall student body, the smallest gap in the county.

Approximately 36% of students experiencing homelessness in Sequoia Union met CSU or UC admission standards, which was higher than rates in San Mateo Union (21%) and Jefferson Union (21%).

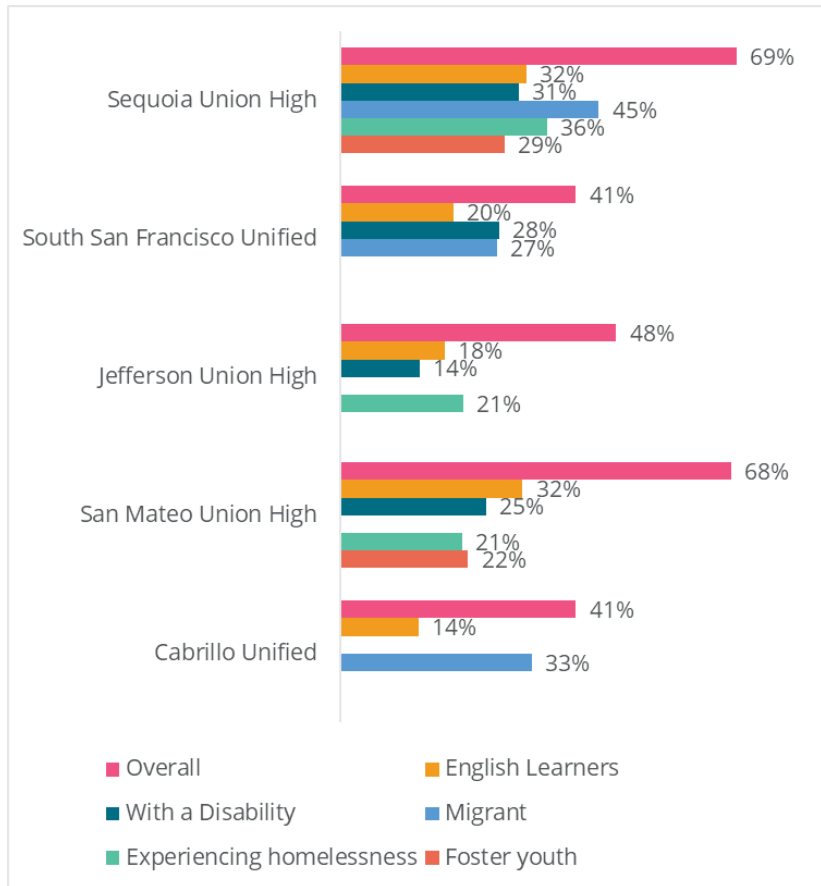
Just San Mateo Union and Sequoia Union had enough foster youth to report their rate of meeting CSU or UC admission standards. In Sequoia Union, 29% met admissions standards and 22% in San Mateo Union met admissions standards.

**Figure V-25.
Students Meeting
University
Admission
Standards, 2019-
2020**

Source:

California Department of Education
and Root Policy Research.

Notes; La-Honda Pescadero Unified
is excluded from these data as they
do not report admission standards
data for these special groups, likely
due to small sample size.

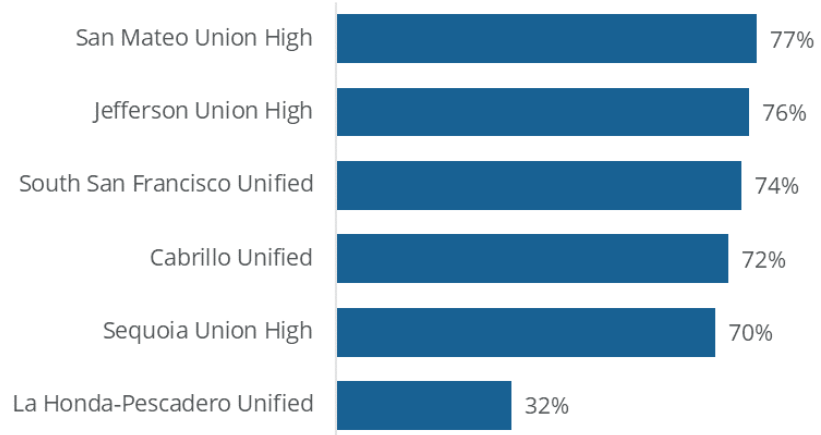


College-going rates. The college-going rate is defined as the percentage of public high school students who completed high school in a given year and subsequently enrolled in any public or private postsecondary institution (in-state or out-of-state) in the United States within 12 or 16 months of completing high school.

Most school districts in the county have a college-going rate at 70% or higher. San Mateo Union had the highest college-going rate at 77%. La Honda-Pescadero School District is the notable exception, with just 32% of graduates attending college within 12 or 16 months.

Figure V-26.
College-Going
Rates, 2017-2018

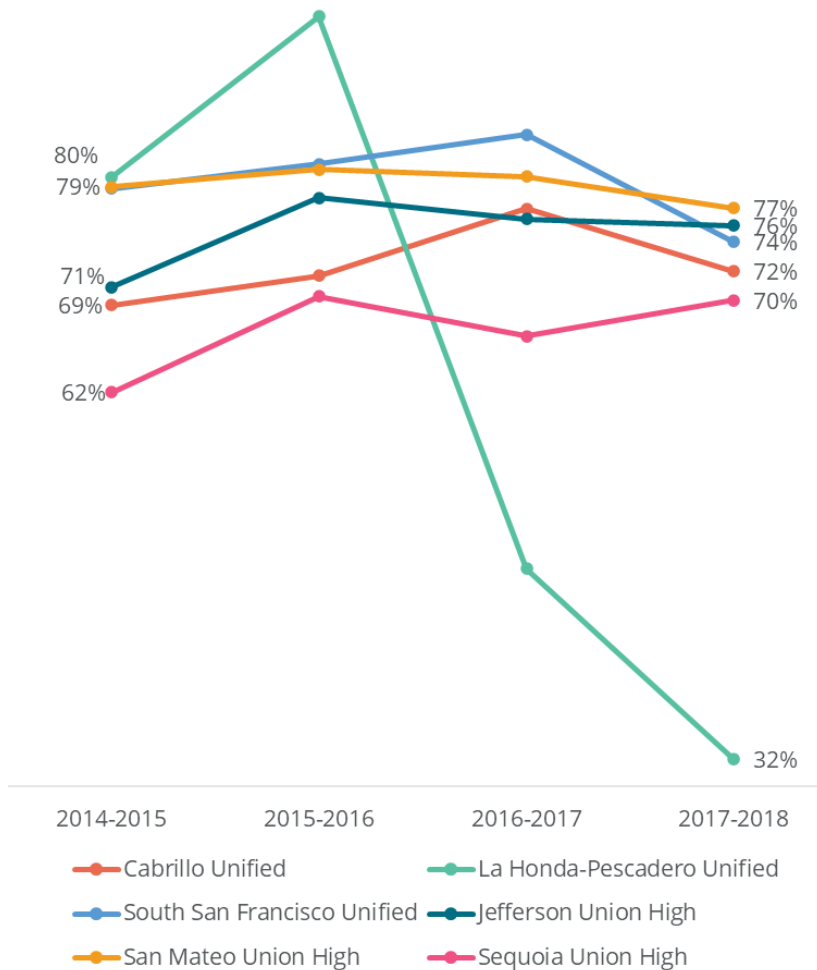
Source:
California Department of Education
and Root Policy Research.



As shown in Figure V-27, La Honda-Pescadero School District previously had the highest college-going rate of all the county's high school districts, with an 80% college-going rate in 2014-2015 and a 93% college-going rate in 2015-2016. The district experienced a rapid decline in college-going rates, starting in 2016-2017. However, La Honda-Pescadero has especially small sample sizes. For instance, the district had just 26 twelfth-graders in the 2017-2018 school year, meaning that just a couple students going to college (or not) drastically alters the college-going rate in La Honda-Pescadero. All other high school districts in the county have maintained relatively consistent college-going rates.

**Figure V-27.
College-Going
Rates, 2014-2015 to
2017-2018**

Source:
California Department of Education
and Root Policy Research.

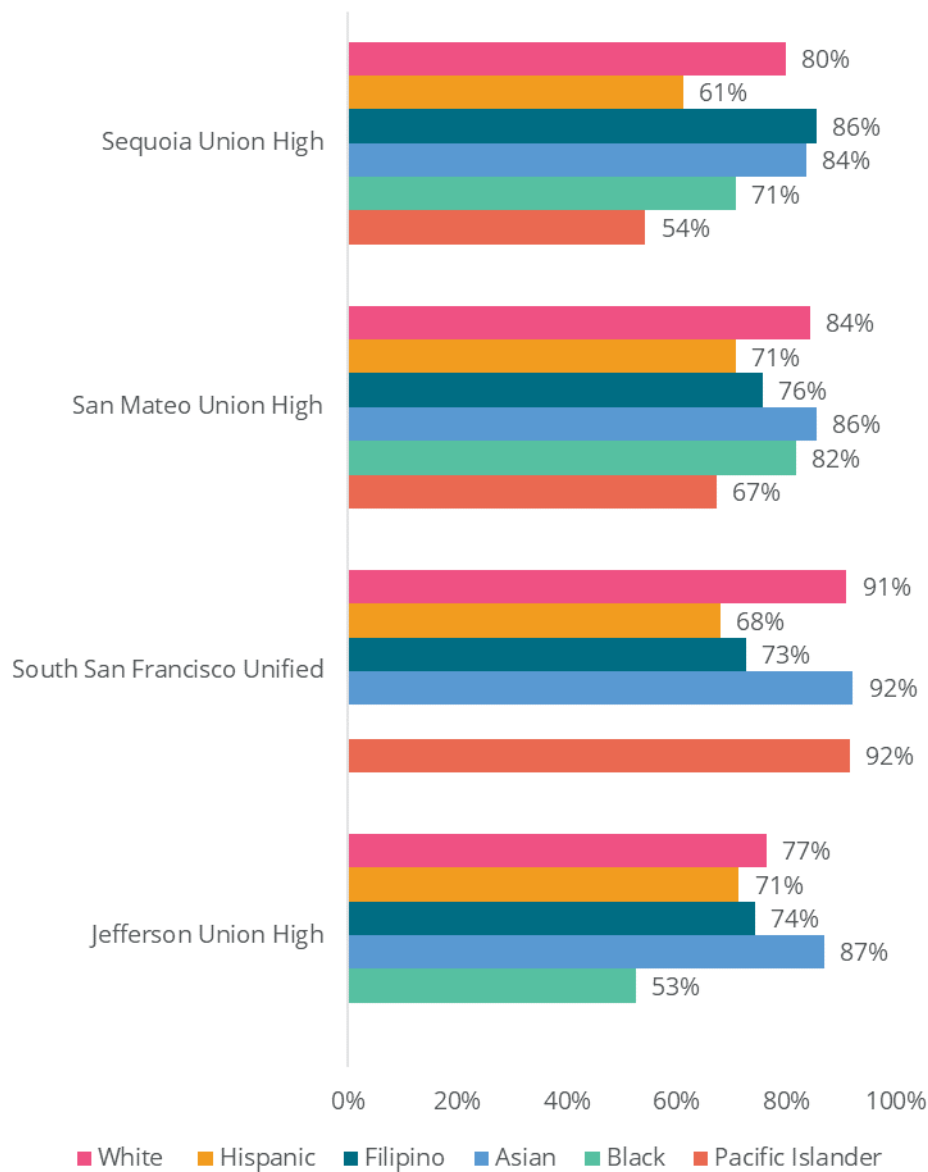


Within each of the high school districts, college-going rates vary by race and ethnicity.

- In every district, White students have a higher college-going rate than Hispanic students, but the largest gaps are in South San Francisco Unified, where 91% of White students go to college compared to just 68% of Hispanic students, a 23 percentage point gap. Jefferson Union has the smallest gap between the two groups: 77% of White students go to college compared to 71% of Hispanic students.
- Among Black/African American students, those at San Mateo Union have the highest college-going rate at 82%. Those at Jefferson Union have the lowest at just 53%, which is 24 percentage points lower than that of White students and 34 percentage points lower than that of Asian students.
- Overall, Asian students have among the highest college-going-rates in the county. The rate is especially high in South San Francisco Unified, where 92% go to college. The rate is lowest in Sequoia Union High School District, where 84% go to college.

- Filipino students also have generally high rates of college-going. The highest college-going rate among Filipino students is in Sequoia Union (86%) and the lowest is in South San Francisco Unified (73%).
- College-going rates for Pacific Islander students vary substantially by district. For instance, in Sequoia Union 54% go to college, but in South San Francisco Unified 92% go to college.

Figure V-28.
College-going Rates by Race and Ethnicity, 2017-18



Note: Cabrillo Unified and La Honda- Pescadero Unified are not included here because they do not report the data, likely due to small sample sizes.

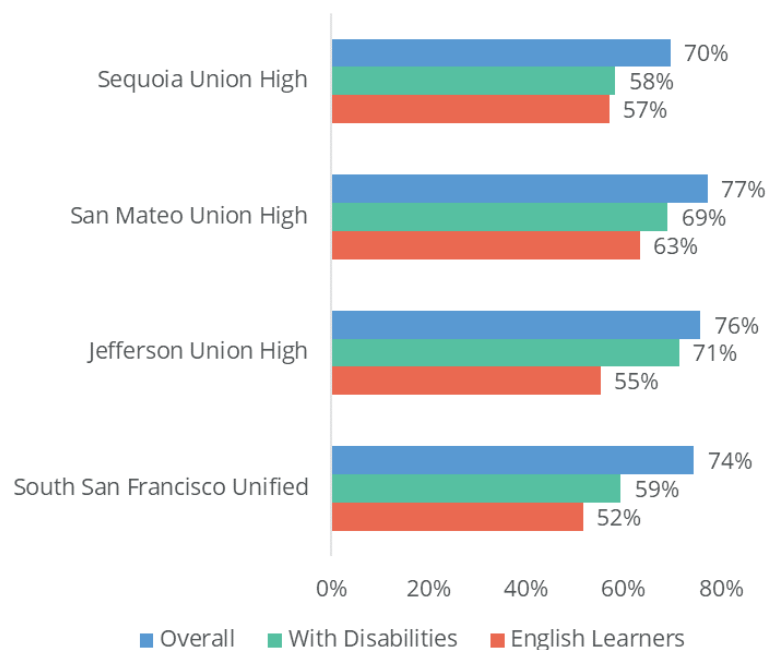
College-going rates are lower for students with disabilities and those learning English compared to the overall student population across the county.

- For instance, the largest gap between overall college-going rates and English learners' college-going rates is in South San Francisco Unified, where just 52% of English learning students go to college as opposed to 74% of the overall student population—a 22 percentage point gap. Among English learners, San Mateo Union High School District had the highest college-going rate, where 63% of English learners go to college.
- Among students with disabilities, South San Francisco Unified also had the largest gap, where 59% of students with disabilities went to college compared to 74% of the overall student population — a 15 percentage point gap. Jefferson Union, on the other hand, had a relatively high college-going rate among students with disabilities that was not very different from the district's overall college-going rate: 71% went to college which is just five percentage points lower than the district's overall student population.

Figure V-29.
College-going Rates
for English Learners
and Students with
Disabilities, 2017-
2018

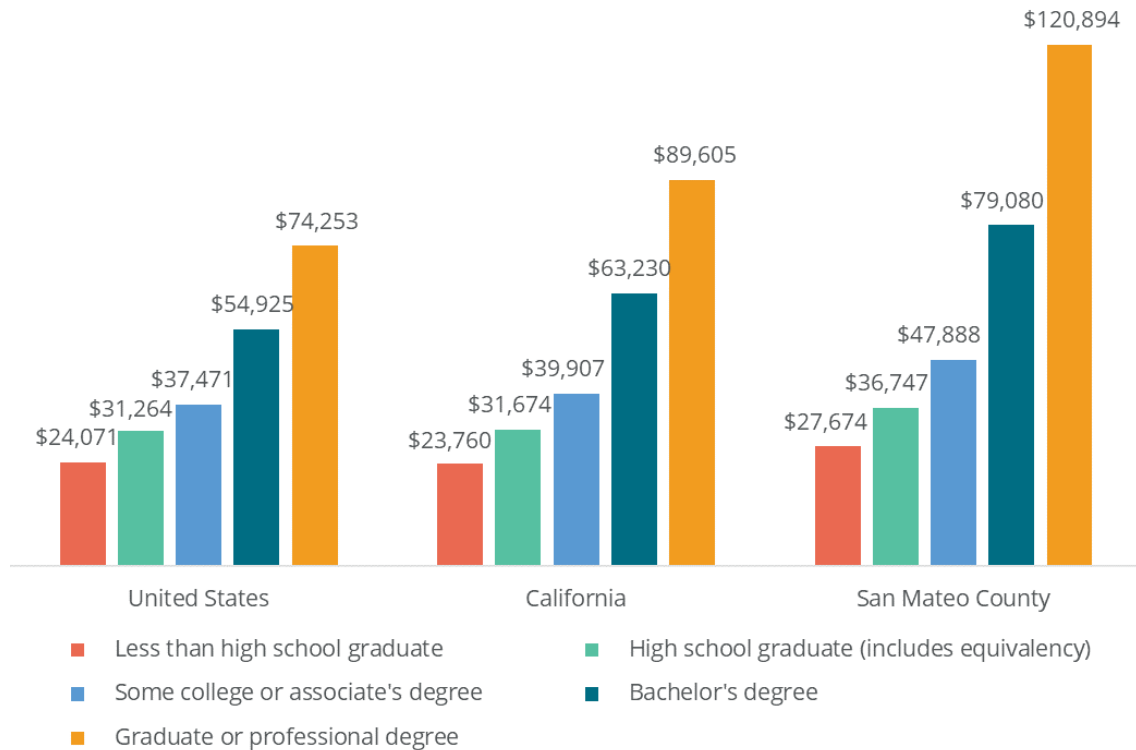
Note:
Cabrillo Unified and La Honda-Pescadero Unified are not included here because they do not report the data, likely due to small sample sizes.

Source:
California Department of Education
and Root Policy Research.



Gaps in college enrollment by race, ethnicity, disability status, or English learning have stark financial consequences for students in the long-term. Figure V-30 illustrates median annual earnings by educational attainment. College degrees are especially important in San Mateo County: those with a bachelor's degree in the county earn 115% more than those with a high school diploma. This gap is wider in San Mateo County than in other parts of California and nationwide. The differences between high-school graduate earnings and bachelor's degree earnings are around 100% in California and 76% in the US overall.

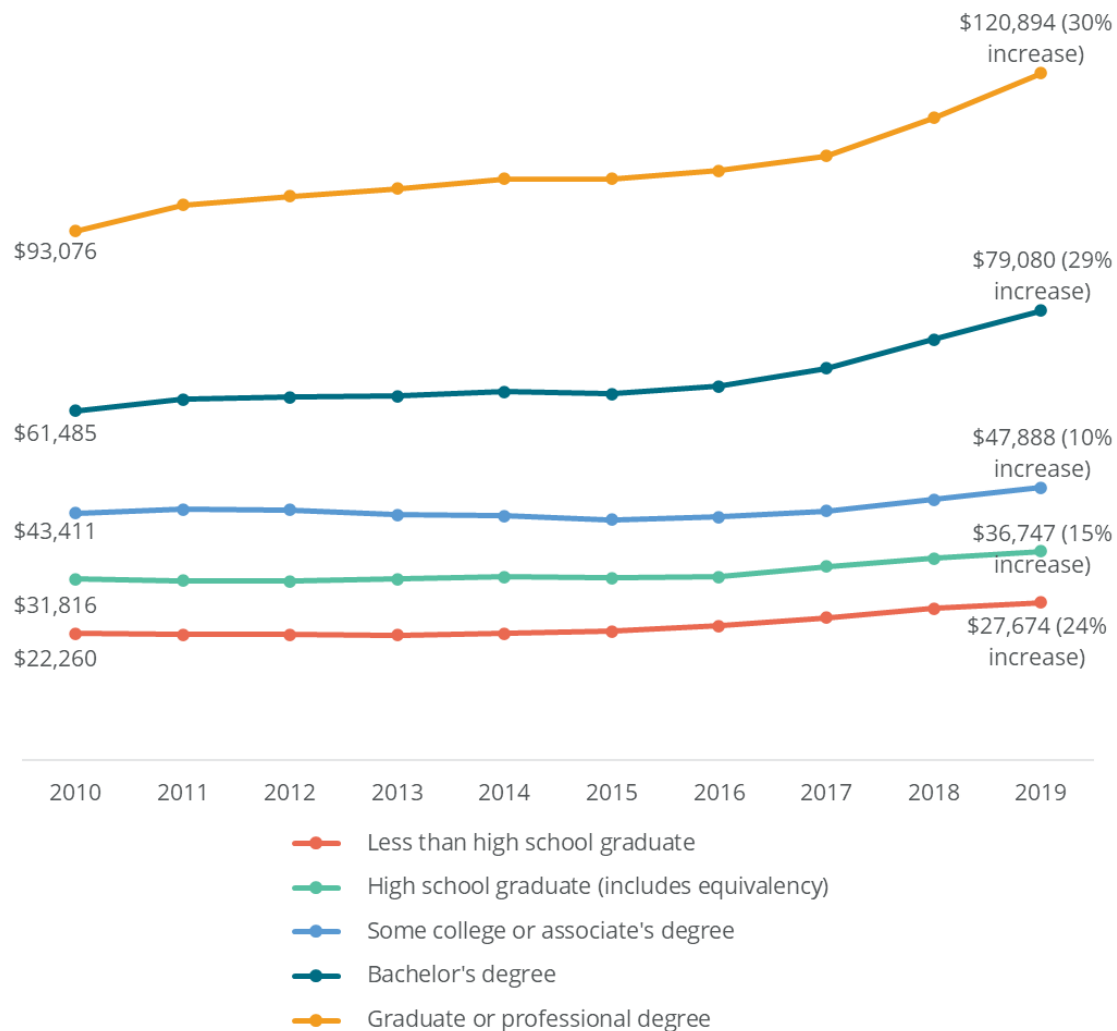
Figure V-30.
Median Annual Earnings by Educational Attainment, 2019



Source: 5-year 2019 American Community Surveys Data.

Unfortunately, the gap between high school graduates' and college graduates' earnings have been increasing in San Mateo County. As illustrated in Figure V-31, median earnings for high school graduates increased by just 15% over the last decade (from \$31,816 to \$36,747) while earnings for college graduates increased by 29% over the same period (from \$61,485 to \$79,080).

Figure V-31.
Median Annual Earnings by Educational Attainment in San Mateo County, 2010 to 2019



Source: 5-year American Community Surveys Data.

Because income disparities between college graduates and high school graduates have been increasing, it is increasingly important that school districts in San Mateo County address differences in college-going rates stratified by race, ethnicity, and extenuating circumstances.

Barriers to Success

Many students are unable to achieve academic success because of barriers in home and school. This section explores the available indicators of barriers to success, including chronic absenteeism and dropout rates. It also describes inequities in discipline rates by

race and ethnicity, which has been linked both to discrimination by education professionals as well as a major barrier to students' future success.

Chronic absenteeism. Academic studies have found that if a student is chronically absent, it reduces their math and reading achievement outcomes, educational engagement, and social engagement.¹² Chronic absenteeism also has spillover effects and negatively impacts students who themselves are not chronically absent. For instance, one study found that students suffer academically from having chronically absent classmates—as exhibited across both reading and math testing outcomes.¹³

Students are considered chronically absent if they were absent for 10% or more of the days during a school year. Note, however, students are exempt from chronic absenteeism calculations if they receive instruction through a home or hospital instructional setting, are attending community college full-time, or were not expected to attend more than 31 days.

In the county overall, 10% of students were chronically absent during the 2018-2019 school year.¹⁴ This is a slight increase from the 2016-2017 school year, where just 9% of students overall were chronically absent.

Chronic absenteeism rates were higher in districts with a large number of students experiencing economic and housing precarity. For instance, Ravenswood Elementary, which has a 30% rate of homelessness among students, had one of the higher rates of chronic absenteeism at 16%. La Honda-Pescadero and Sequoia Union high school districts also had high rates of chronically absent students at 16% and 17%, respectively.

When disaggregating by race and ethnicity, just 3% of Asian students were chronically absent, and 7% of White and Filipino students were chronically absent. On the other end of the spectrum, Pacific Islander students (26%), Black/African American students (18%), and Hispanic students (15%) had notably higher rates of chronic absenteeism than the overall student population (10%). Chronic absenteeism among Pacific Islander students has increased in recent years, as illustrated in Figure V-32.

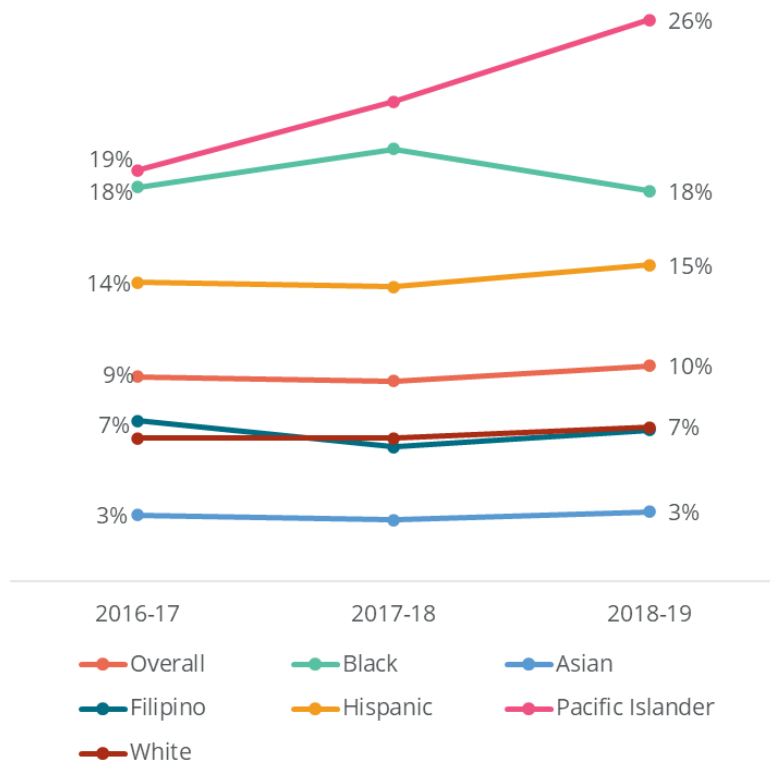
¹² Gottfried, Michael A. "Chronic absenteeism and its effects on students' academic and socioemotional outcomes." *Journal of Education for Students Placed at Risk (JESPAR)* 19.2 (2014): 53-75.

¹³ Gottfried, Michael A. "Chronic absenteeism in the classroom context: Effects on achievement." *Urban Education* 54.1 (2019): 3-34.

¹⁴ Because of the physical school closures during the COVID-19 pandemic, the California Department of Education determined that 2019–2020 absenteeism data are not valid, therefore, we present data from the 2018-2019 school year.

**Figure V-32.
Chronic
Absenteeism by
Race/Ethnicity,
2016-2017 to 2018-
2019**

Source: California Department of
Education and Root Policy
Research



Chronic absenteeism among Pacific Islander students was especially pronounced in San Mateo-Foster City school district where there was a 26 percentage point gap between chronic absenteeism rates for Pacific Islander students (32%) and the overall student body (6%). Other districts had similarly large gaps, including San Bruno Park Elementary (20 percentage points) and South San Francisco Unified (18 percentage points).

Some districts had larger gaps in absenteeism rates between Black/African American students and the overall population. For instance, in San Carlos Elementary, 4% of the overall student body is chronically absent compared to 27% of Black/African American students— a 23 percentage point gap. Jefferson Elementary school district had a 17 percentage point gap between their overall chronic absenteeism rate (12%) and their chronic absenteeism rate among Black/African American students (28%).

Among White students, Bayshore Elementary School District was a major outlier, where 46% of White students were chronically absent compared to just 12% of the total student population. However, it is important to note that this represents a very small sample of White students: just 3% of students at Bayshore Elementary are White, one of lowest in the county.

Figure V-33.
Chronic Absenteeism by District and Race/Ethnicity, 2018-2019

School District	Total	Asian	Black	Filipino	Hispanic	Pacific Islander	White
Unified School Districts							
Cabrillo Unified	10%	5%	(no data)	5%	11%	(no data)	10%
La Honda-Pescadero	16%	(no data)	(no data)	(no data)	14%	(no data)	18%
South San Francisco	13%	4%	16%	7%	17%	31%	12%
High & Elementary School Districts							
Jefferson Union High School	15%	8%	22%	11%	22%	18%	15%
Bayshore Elementary	12%	5%	12%	0%	18%	19%	46%
Brisbane Elementary	12%	3%	(no data)	12%	17%	(no data)	17%
Jefferson Elementary	12%	5%	28%	6%	13%	25%	23%
Pacifica	7%	4%	12%	6%	9%	21%	7%
San Mateo Union High School	10%	3%	18%	4%	17%	21%	9%
Burlingame Elementary	5%	2%	15%	5%	10%	20%	5%
Hillsborough Elementary	4%	1%	(no data)	4%	4%	(no data)	6%
Millbrae Elementary	10%	3%	6%	17%	16%	26%	14%
San Bruno Park Elementary	12%	5%	10%	4%	14%	32%	9%
San Mateo-Foster City	6%	2%	9%	2%	10%	32%	4%
Sequoia Union High School	17%	6%	23%	8%	23%	33%	10%
Belmont-Redwood Shores	5%	3%	8%	5%	12%	17%	5%
Las Lomitas Elementary	4%	2%	0%	(no data)	7%	(no data)	3%
Menlo Park City Elementary	3%	1%	8%	7%	5%	14%	3%
Portola Valley Elementary	4%	0%	(no data)	(no data)	6%	(no data)	3%
Ravenswood City Elementary	16%	0%	20%	(no data)	15%	24%	21%
Redwood City Elementary	10%	2%	19%	3%	12%	18%	4%
San Carlos Elementary	4%	2%	27%	8%	7%	(no data)	3%
Woodside Elementary	8%	0%	0%	(no data)	12%	(no data)	7%
Total	10%	3%	18%	7%	15%	26%	7%

Source: California Department of Education and Root Policy Research

In most districts, chronic absenteeism is higher among students with disabilities. In fact, only Bayshore Elementary's students with disabilities had a lower rate of chronic absenteeism than the overall student body. In all other districts, students with disabilities were more likely to be chronically absent than the overall student population. This was particularly true in Sequoia Union High School District, Jefferson Union High School District, and San Mateo Union High School District, which had gaps between the overall

absenteeism rate and the absenteeism rate among students with disabilities of 13, 12, and 11 percentage points, respectively.

Rates of chronic absenteeism were also higher among English learners than the general population in most districts (with the exception of Ravenswood City Elementary and Jefferson Elementary). Woodside Elementary and Sequoia Union High School districts both had 14 percentage point gaps between absenteeism rates of English learners and the overall student body.

In every school district where the data are available, foster youth had higher rates of chronic absenteeism than the overall population. This was especially true in Sequoia Union High School District, where 63% of foster youth were chronically absent compared to just 17% of the overall student body.

Similarly, in almost all districts with available data, students experiencing homelessness had higher rates of chronic absenteeism than the overall student body. The chronic absenteeism rate among students experiencing homelessness was highest in Burlingame Elementary at 64%.

Migrant students were chronically absent at rates similar to or lower than the total student body in all districts with reported data.

Figure V-34.
Chronic Absenteeism by District and Extenuating Circumstance, 2018-2019

School District	Total	English Learners	Experiencing homelessness	Migrant	Foster Youth	With Disabilities
Unified School Districts						
Cabrillo Unified	10%	12%	23%	9%	(no data)	18%
La Honda-Pescadero	16%	16%	(no data)	(no data)	(no data)	22%
South San Francisco	13%	14%	47%	13%	49%	18%
High & Elementary School Districts						
Jefferson Union High School	15%	27%	33%	(no data)	36%	28%
Bayshore Elementary	12%	19%	(no data)	(no data)	(no data)	11%
Brisbane Elementary	12%	18%	(no data)	(no data)	(no data)	18%
Jefferson Elementary	12%	10%	21%	(no data)	24%	16%
Pacifica	7%	11%	(no data)	(no data)	(no data)	14%
San Mateo Union High School	10%	21%	50%	(no data)	53%	21%
Burlingame Elementary	5%	8%	64%	(no data)	(no data)	12%
Hillsborough Elementary	4%	6%	(no data)	(no data)	(no data)	8%
Millbrae Elementary	10%	12%	5%	(no data)	(no data)	12%
San Bruno Park Elementary	12%	12%	(no data)	(no data)	18%	20%
San Mateo-Foster City	6%	8%	15%	(no data)	17%	13%
Sequoia Union High School	17%	31%	52%	16%	63%	29%
Belmont-Redwood Shores	5%	11%	(no data)	(no data)	(no data)	10%
Las Lomitas Elementary	4%	6%	(no data)	(no data)	(no data)	5%
Menlo Park City Elementary	3%	5%	(no data)	(no data)	(no data)	9%
Portola Valley Elementary	4%	3%	(no data)	(no data)	(no data)	9%
Ravenswood City Elementary	16%	16%	19%	17%	23%	21%
Redwood City Elementary	10%	12%	30%	6%	32%	16%
San Carlos Elementary	4%	8%	23%	(no data)	(no data)	11%
Woodside Elementary	8%	22%	(no data)	(no data)	(no data)	10%

Source: California Department of Education and Root Policy Research

Dropout rates. As previously indicated, workers without a high school degree have the lowest annual earnings compared to others at higher levels of educational attainment. In addition to the economic and housing precarity associated with low earnings, low earnings also often lead to increased incentives to participate in criminal activity. In fact, one study

suggest that high school dropouts are 3.5 times more likely than high school graduates to be imprisoned at some point during their lifetime.¹⁵ Another study found that raising the high school completion rate by one percent for all men ages 20 through 60 would save the US \$1.4 billion annually in crime related costs.¹⁶ Dropping out of high school also has adverse health costs: for instance, research has shown that high school dropouts are more likely to smoke and have a marijuana disorder in adulthood.¹⁷ For these reasons, reducing high school dropout rates in San Mateo County is pivotal to the health and economic prosperity of the community.

In this report, dropout rates shown for high school districts with available data and are defined as the percentage of cohort students who did not graduate with a regular high school diploma, did not complete high school, and are not still enrolled as a "fifth year senior".

In the 2019-2020 academic year, dropout rates were highest in Sequoia Union High School District, where 10% of students dropped out. This is similar to South San Francisco Unified, where 9% of students dropped out. In both these districts, and in Cabrillo Unified, dropout rates have increased since 2016-2017.

Dropout rates have decreased by one percentage point over the same period in San Mateo Union High School District, from 5% to 4%. Jefferson Union had the lowest dropout rate in the county at just 3%, which after slightly higher rates in 2017-18 and 2018-19, is the same as its 2016-2017 rate.

¹⁵ Monrad, Maggie. "High School Dropout: A Quick Stats Fact Sheet." National High School Center (2007).

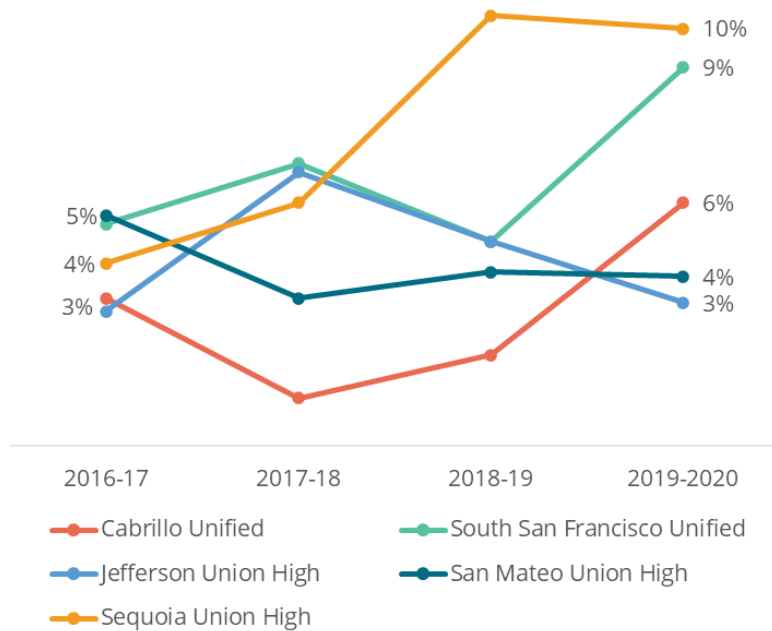
¹⁶ U.S. Department of Justice, Bureau of Justice Statistics. (2002). Correctional populations in the United States, 1998 (NCJ-192929). Washington: U.S. Government Printing Office.

¹⁷ Gonzalez, Jennifer M. Reingle, et al. "The long-term effects of school dropout and GED attainment on substance use disorders." Drug and alcohol dependence 158 (2016): 60-66.

Figure V-35.
Dropout Rates by
District, 2016-2017 to
2019-2020

Note: La Honda-Pescadero Unified School District is excluded from these data.

Source: California Department of Education and Root Policy Research

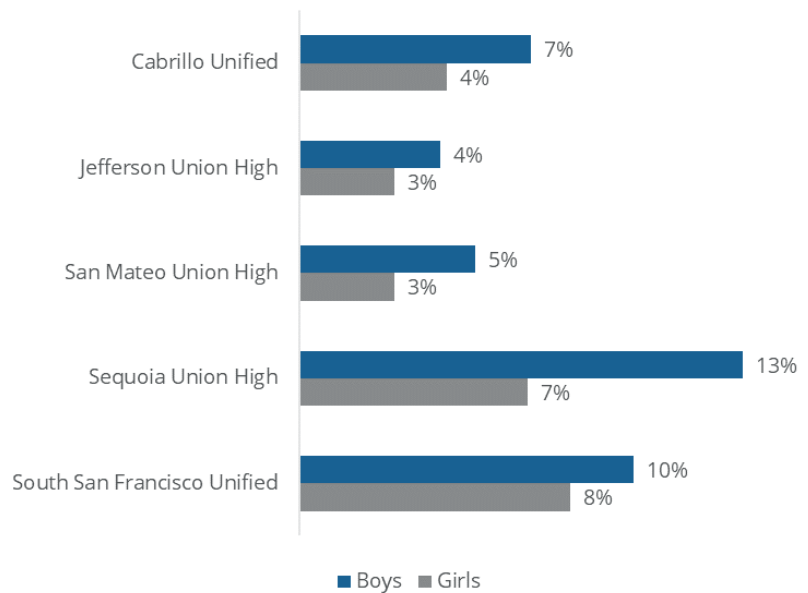


In all school districts in the county, dropout rates are higher for boys than for girls. Jefferson Union had the smallest gender gap, where 3% of girls dropped out and 4% of boys dropped out. Sequoia Union had the widest gender gap, where 13% of boys dropped out compared to just 7% of girls.

Figure V-36.
Dropout Rates by
Gender, 2019-2020

Note: La Honda-Pescadero Unified School District is excluded from these data.

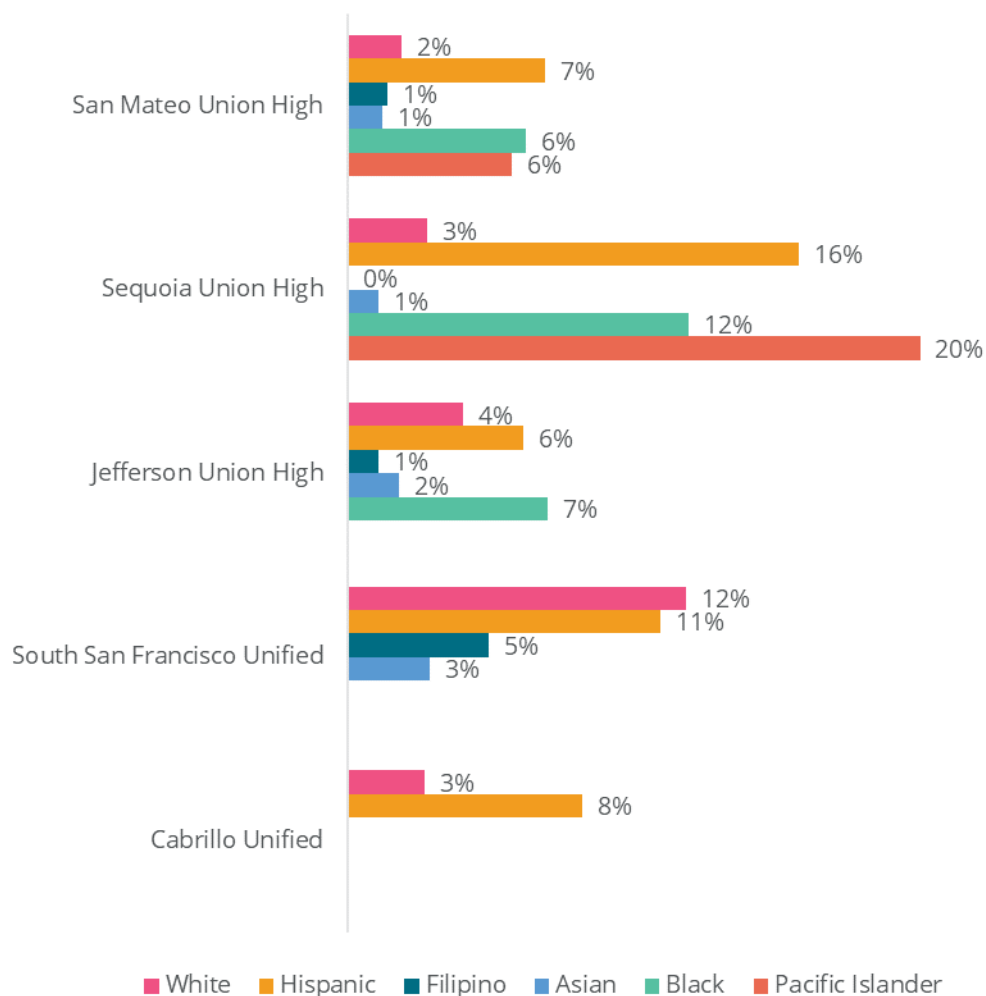
Source: California Department of Education and Root Policy Research



Pacific Islander, Black/African American, and Hispanic students in the county often had higher dropout rates than those in other racial and ethnic groups.

- In Sequoia Union High School District, dropout rates were highest among Pacific Islander students, where 20% dropped out in the 2019-2020 academic year. Dropout rates were also especially high among Hispanic and Black/African American students in Sequoia Union, at 16% and 12% respectively.
- In districts with lower dropout rates, for instance, Jefferson Union, the highest dropout rates still found among Black/African American (7%) and Hispanic students (6%).
- Notably, however, in South San Francisco Unified, White students were more likely to drop out than any other racial or ethnic group. In fact, 12% of White students dropped out compared to 11% of Hispanic students, 5% of Filipino students, and 3% of Asian students. Data for Black/African American and Pacific Islander students were not available for South San Francisco Unified due to small sample sizes.

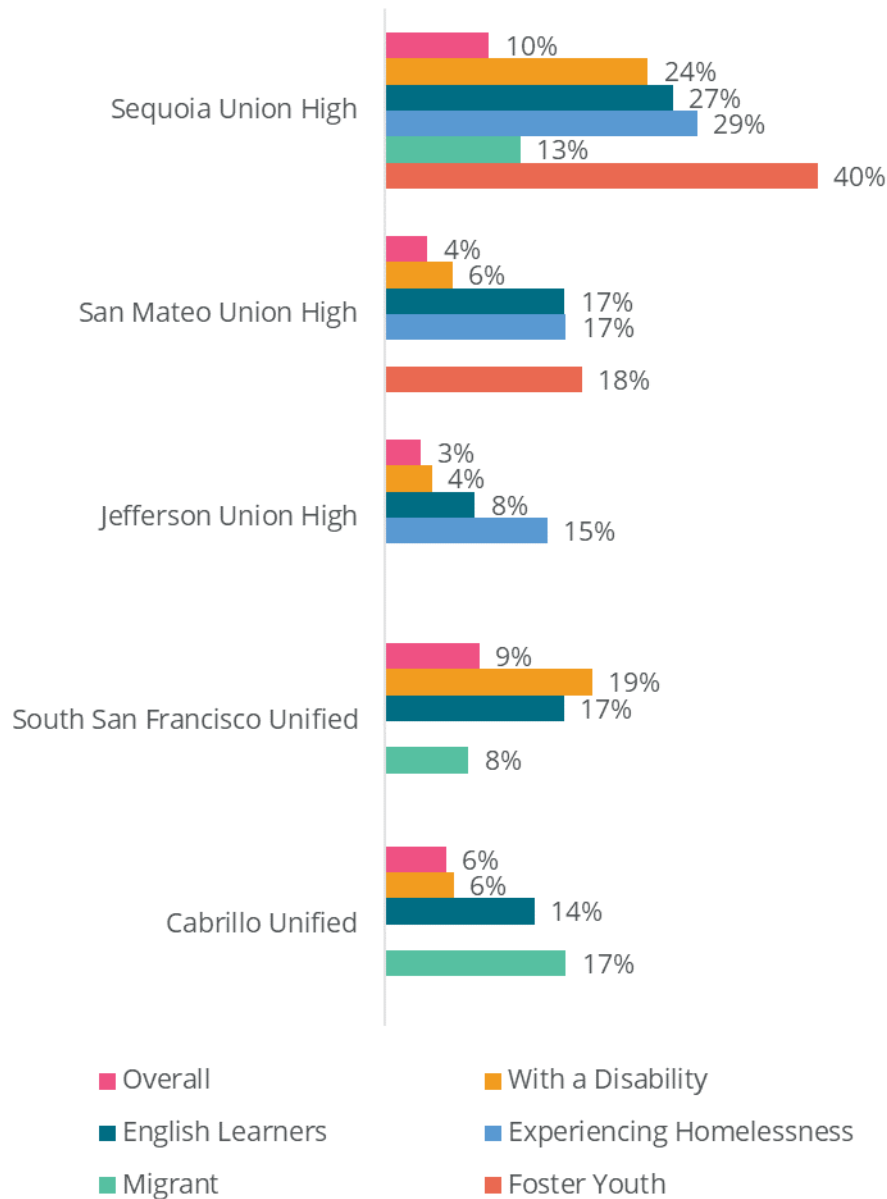
Figure V-37.
Dropout Rates by Race, 2019-2020



In all school districts in the county, students with disabilities, students experiencing homelessness, foster youth, and students learning English had higher dropout rates than the overall population.

- Among students with disabilities, the highest dropout rate was in Sequoia Union, where 24% dropped out. The gap between overall dropout rates and dropout rates among students with disabilities was wide in Sequoia Union at 14 percentage points.
- Cabrillo Unified, on the other hand, had less than a one percentage point gap between the dropout rate of overall students (6%) and students with disabilities (6%).
- Among students learning English, Sequoia Union had the highest dropout rate at 27%, while Jefferson Union had the lowest dropout rate at 8%.
- Sequoia Union also had the highest rate of dropout among students experiencing homelessness at 29% while Jefferson Union, again, had the lowest at 15%.
- Foster Youth in Sequoia Union had an exceptionally high dropout rate at 40%. San Mateo Union is the only other district in the county which reported these data in 2019-2020, and found only 18% of foster youth dropped out.
- Migrant students at South San Francisco Unified actually dropped out at a rate slightly lower than the general student body: just 8% of migrant students dropped out compared to 9% of the overall student body. However, those in Cabrillo Unified were 11 percentage points more likely than the total student body to dropout.

Figure V-38.
Dropout Rates by Extenuating Circumstance, 2019-2020



Source: California Department of Education and Root Policy Research

Disproportionate discipline rates. Strict discipline policies may stigmatize suspended students and expose them to the criminal justice system at a young age, setting them up for limited economic and social success down the line. Research has found that suspensions not only negatively affect the suspended students, but also their peers.

Students in schools with higher suspension rates are more likely to drop out of school and less likely to attend a four-year college.¹⁸

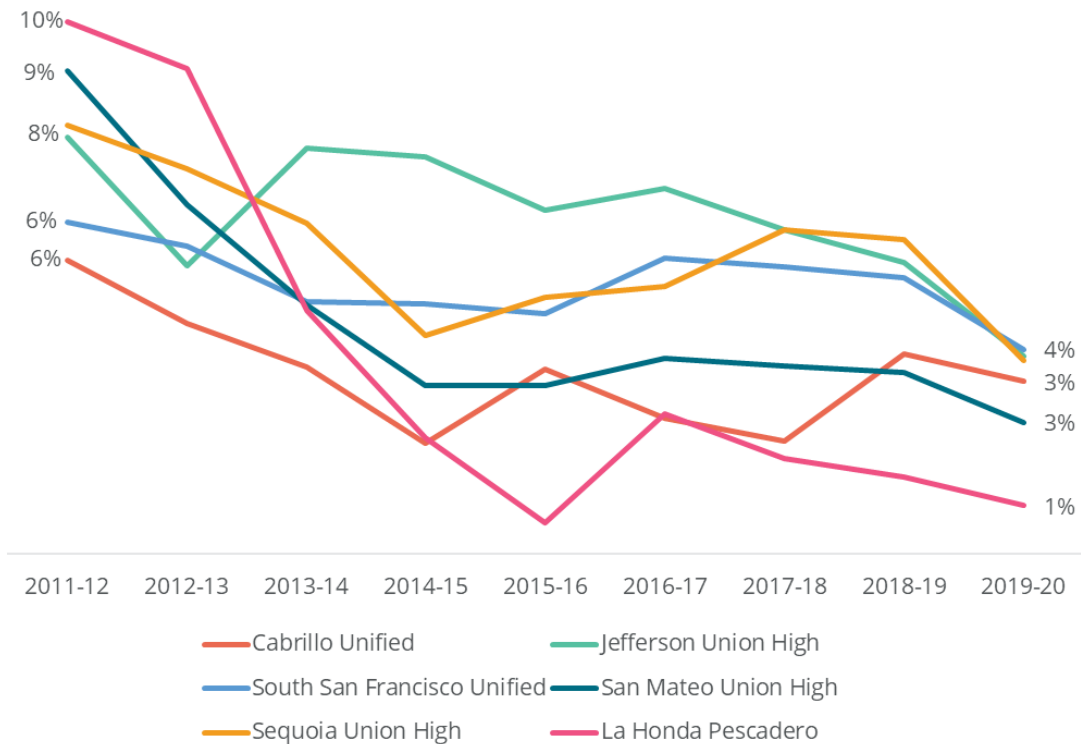
Other academic studies have found that students from African American and Latino families are more likely than their White peers to receive expulsion or out of school suspension as consequences for the same or similar problem behavior.¹⁹ This means that Black/African American and Hispanic students suffer more of the economic and social consequences than their White peers for the same behaviors.

Luckily, in every high school district in San Mateo County, suspension rates have decreased since 2011-2012. La Honda-Pescadero School District experienced the largest decrease: it was the district with the highest suspension rate in 2011-2012 at 10%, but now has the lowest suspension rate at just 1% in 2019-2020. San Mateo Union also experienced a rapid decrease in suspension rates over the same period, with a rate of 9% in 2011-2012 to a rate of 3% in 2019-2020.

¹⁸ Bacher-Hicks, Andrew, Stephen B. Billings, and David J. Deming. The school to prison pipeline: Long-run impacts of school suspensions on adult crime. No. w26257. National Bureau of Economic Research, 2019.

¹⁹ Skiba, Russell J., et al. "Race is not neutral: A national investigation of African American and Latino disproportionality in school discipline." *School Psychology Review* 40.1 (2011): 85-107.

Figure V-39.
Suspension Rates, 2011-2012 to 2019-2020



Source: California Department of Education and Root Policy Research

In many school districts across San Mateo County, Hispanic students are disciplined at disproportionately higher rates compared to their peers. Figure V-40 compares each racial/ethnic group's share of suspensions to their share of the overall student population.

- In all districts except for La Honda-Pescadero, Hispanic students make up a larger share of suspensions than their overall share of the student body. For instance, in San Mateo Union, 34% of students are Hispanic, but 66% of suspended students are Hispanic, making a 32 percentage point overrepresentation gap.
- In most districts, Black and Pacific Islander students are also overrepresented in terms of suspension rates, but these rates are slight compared to those of Hispanic students. For instance, in Sequoia Union, just 2% of the student body identified as Pacific Islander but 8% of suspended students were Pacific Islander.
- Asian and Filipino students were *underrepresented* in terms of suspension rates. For example, in Jefferson Union High School District, 31% of students identified as Filipino but just 10% of suspended students were Filipino, a 21 percentage point gap. In San

Mateo Union High School, 22% of students identified as Asian but just 5% of suspended students were Asian, a 17 percentage point gap.

- White students were also underrepresented in discipline rates in most districts except for La Honda-Pescadero, where they were overrepresented by 30 percentage points. They were substantially underrepresented in Cabrillo Unified (with a gap of 21 percentage points) and Sequoia Union (18 percentage points).

Figure V-40.
Suspension Rates by Race and Ethnicity, 2019-2020

School District	Cabrillo Unified	Jefferson Union High	La Honda- Pescadero	San Mateo Union High	Sequoia Union High	South San Francisco Unified
Asian Students						
Share of Student Body	1%	14%		22%	9%	13%
Share of Suspensions	1%	7%		5%	1%	3%
Gap	0%	-7%		-17%	-8%	-10%
Black Students						
Share of Student Body		1%		1%	3%	1%
Share of Suspensions		5%		1%	6%	2%
Gap		4%		0%	3%	1%
Filipino Students						
Share of Student Body	1%	31%		6%	2%	23%
Share of Suspensions	0%	10%		2%	0%	9%
Gap	-1%	-21%		-4%	-2%	-14%
Hispanic Students						
Share of Student Body	52%	32%	61%	34%	41%	48%
Share of Suspensions	79%	46%	33%	66%	62%	69%
Gap	27%	14%	-28%	32%	21%	21%
Pacific Islander Students						
Share of Student Body		1%		2%	2%	2%
Share of Suspensions		4%		4%	8%	3%
Gap		3%		2%	6%	1%
White Students						
Share of Student Body	40%	14%	37%	26%	38%	7%
Share of Suspensions	19%	16%	67%	14%	20%	7%
Gap	-21%	2%	30%	-12%	-18%	0%

Notes: the percentage of suspensions and shares of racial groups do not sum to 100% because we exclude students with no reported race, with more than one reported race, where districts did not report racial/ethnic data due to small sample sizes. Gaps of 15 percentage points or more are highlighted.

Source: California Department of Education and Root Policy Research

Staff demographics. Diversity of school staff has been shown to improve outcomes for students of color. For instance, one recent study found that students are less likely to be removed from school as punishment when they and their teachers are the same race. This effect is driven almost entirely by black students, especially black boys, who are markedly less likely to be subjected to exclusionary discipline when taught by black teachers. There is little evidence of any benefit for white students of being matched with white teachers.²⁰ Other research in California has found that, when students have a teacher of their race, they are more likely to attend class, therefore reducing chronic absenteeism.²¹ Even more studies have found that having a teacher of a student's own race substantially improves their math and reading achievement.²²

In San Mateo County, the demographics of faculty and staff are fairly similar to that of its students. Figure V-41 illustrates the share of the county's faculty and staff who are Asian, Black/African American, Hispanic, Filipino, Pacific Islander, and White, and compares those shares to the racial/ethnic breakdown of the county's student body.

There is a slightly larger share of White and Black/African American staff than students, meaning that Black/African American and White student groups are more likely to interact with same-race staff and faculty than other racial groups. Asian students are less likely to interact with a same-race staff or faculty member: 17% of the student body is Asian compared to just 8% of staff and faculty.

²⁰ Lindsay, Constance A., and Cassandra MD Hart. "Teacher race and school discipline: Are students suspended less often when they have a teacher of the same race?" *Education Next* 17.1 (2017): 72-79.

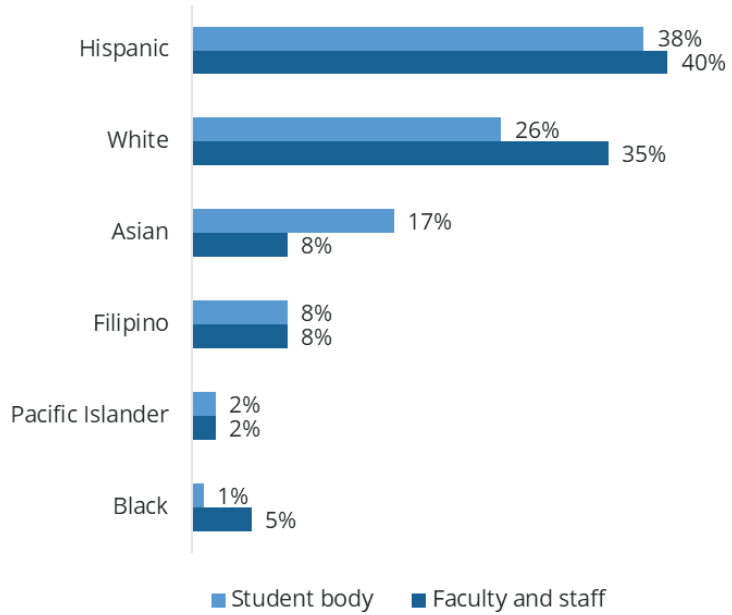
²¹ Gottfried, Michael, J. Jacob Kirksey, and Tina L. Fletcher. "Do High School Students With a Same-Race Teacher Attend Class More Often?." *Educational Evaluation and Policy Analysis* (2021): 01623737211032241.

²² Dee, T. S. (2004). Teachers, race, and student achievement in a randomized experiment. *Review of economics and statistics*, 86(1), 195-210.

**Figure V-41.
Staff and Student
Demographics,
2020-2021**

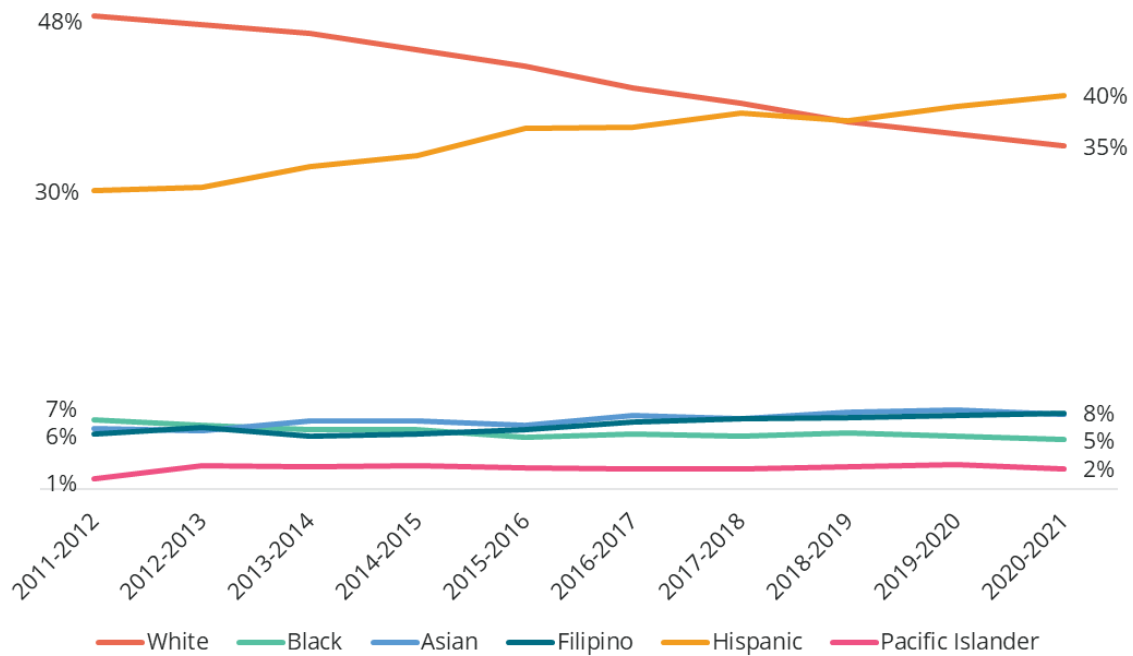
Notes: Percentages do not always sum to 100% because we do not show shares of staff with no reported race, with more than one reported race, or Native American staff.

Source: California Department of Education and Root Policy Research



Since 2011-2012, the county's school districts have diversified in that there has been a 13 percentage point decrease in the share of White faculty and staff and a 10 percentage point increase in Hispanic faculty and staff. However, there has been a slight decrease (by two percentage points) in the share of faculty and staff who identify as Black/African American. There has been a two percentage point increase in the share of Asian and Filipino faculty and staff, and a one percent increase in the share of Pacific Islander faculty and staff.

Figure V-42.
Faculty and Staff Demographics, 2011-2012 to 2020-2021



Notes: Percentages do not always sum to 100% because we do not show shares of staff with no reported race, with more than one reported race, or Native American staff.

Source: California Department of Education and Root Policy Research

Figure V-43 illustrates faculty and staff racial and ethnic diversity for the 2020-2021 school year by district.

- Portola Valley has the least diverse faculty and staff in the county, with 59% identifying as White.
- Ravenswood Elementary has the most diverse faculty and staff: the district has the highest share of Pacific Islander (5%), Black/African American (12%) and Hispanic (72%) faculty and staff.
- South San Francisco Unified School District has the highest share of Asian faculty and staff at 14%.
- Brisbane Elementary and Jefferson Elementary have the highest shares of Filipino faculty and staff at 28%.

Figure V-43.
Faculty and Staff Race/Ethnicity, by District, 2020-2021

School District	Asian	Black	Filipino	Hispanic	Pacific Islander	White
Unified School Districts						
Cabrillo Unified	0%	1%	1%	46%	0%	51%
La Honda-Pescadero	0%	5%	5%	39%	0%	51%
South San Francisco	14%	3%	16%	34%	2%	28%
High & Elementary School Districts						
Jefferson Union High School	3%	3%	13%	26%	1%	43%
Bayshore Elementary	13%	4%	17%	61%	0%	4%
Brisbane Elementary	7%	0%	28%	20%	4%	42%
Jefferson Elementary	13%	3%	28%	25%	0%	29%
Pacifica	7%	2%	8%	23%	2%	54%
San Mateo Union High School	11%	5%	6%	34%	3%	40%
Burlingame Elementary	8%	5%	11%	27%	3%	45%
Hillsborough Elementary	2%	1%	7%	20%	1%	55%
Millbrae Elementary	13%	3%	9%	25%	0%	48%
San Bruno Park Elementary	4%	2%	13%	26%	4%	48%
San Mateo-Foster City	13%	2%	7%	33%	3%	37%
Sequoia Union High School	2%	12%	2%	54%	4%	26%
Belmont-Redwood Shores	13%	2%	3%	39%	0%	42%
Las Lomitas Elementary	7%	7%	0%	42%	0%	42%
Menlo Park City Elementary	3%	1%	3%	28%	1%	40%
Portola Valley Elementary	4%	4%	0%	33%	0%	59%
Ravenswood City Elementary	2%	12%	1%	72%	5%	3%
Redwood City Elementary	4%	5%	2%	65%	1%	21%
San Carlos Elementary	8%	6%	3%	37%	1%	42%
Woodside Elementary	12%	8%	0%	30%	0%	49%
Total	8%	5%	8%	40%	2%	35%

Notes: Percentages do not always sum to 100% because we do not show shares of staff with no reported race, with more than one reported race, or Native American staff.

Source: California Department of Education and Root Policy Research

Figure V-44 illustrates the gap between faculty/staff representation and the student body. For instance, at San Bruno Park Elementary, 15% of the students are White while 48% of the faculty/staff are White, leaving a 33 percentage point gap.

If schools are striving for a distribution of faculty/staff that reflects the racial and ethnic distribution of their student body, the closer to a 0 percentage point gap, the better. Schools like San Bruno Park Elementary fall short of meeting this goal, in that there is a large overrepresentation of White faculty/staff compared to the student body. Many other districts have a large overrepresentation of White faculty/staff, including Millbrae Elementary (32 percentage point gap), Jefferson Union High School District (29 percentage point gap), and South San Francisco Unified School District (22 percentage points). There are just a few school districts where the share of White students is higher than the share of White faculty, particularly Woodside Elementary and Menlo Park City Elementary, both with a 15 percentage point gap.

Across most school districts, the share of Asian students is larger than the share of Asian faculty/staff. This suggests that Asian students are less likely than their peers to interact with a same-race teacher or staff member. The largest disparity is in Millbrae Elementary, where just 13% of the faculty identify as Asian compared to 46% of the student body, a 33 percentage point gap.

In many school districts, there is a dearth of Hispanic faculty and staff. For instance, in La Honda-Pescadero, 63% of students are Hispanic compared to 39% of faculty, a 24 percentage point gap. In other districts, however, there is a larger share of Hispanic faculty/staff than students. In Las Lomas Elementary, for instance, 13% of students are Hispanic and 42% of faculty/staff are Hispanic. Recall that Las Lomas Elementary commonly has high-performing English language learners students. This may be partly due to the district's large portion of Hispanic faculty/staff.

Though district wide there are approximately the same portions of Filipino students as there are faculty/staff, Jefferson Union High School stands out as a district where Filipino students are less likely to interact with a same-race teacher or staff member. In Jefferson Union, 29% of students are Filipino compared to just 13% of faculty/staff.

In all districts, there only very small gaps in the share of students that identify as Pacific Islander and the share of faculty/staff that identify as Pacific Islander. All in all, they are represented in approximately equal proportions.

Figure V-44.
Difference Between Staff and Student Populations, by District, 2020-2021

School District	Asian	Black	Filipino	Hispanic	Pacific Islander	White
Unified School Districts						
Cabrillo Unified	-1%	1%	0%	-6%	0%	11%
La Honda-Pescadero	0%	5%	4%	-24%	0%	16%
South San Francisco	0%	2%	-7%	-14%	0%	22%
High & Elementary School Districts						
Jefferson Union High School	-12%	2%	-16%	-5%	0%	29%
Bayshore Elementary	-6%	1%	-4%	20%	-4%	1%
Brisbane Elementary	-13%	-1%	16%	-8%	4%	18%
Jefferson Elementary	-6%	1%	3%	-11%	-1%	18%
Pacifica	-1%	1%	-1%	-3%	2%	15%
San Mateo Union High School	-12%	4%	1%	2%	1%	12%
Burlingame Elementary	-19%	5%	8%	11%	3%	4%
Hillsborough Elementary	-30%	1%	5%	15%	1%	7%
Millbrae Elementary	-33%	2%	3%	5%	-2%	32%
San Bruno Park Elementary	-12%	1%	3%	-15%	-1%	33%
San Mateo-Foster City	-13%	1%	4%	-4%	1%	16%
Sequoia Union High School	-7%	10%	1%	9%	2%	-9%
Belmont-Redwood Shores	-19%	1%	0%	27%	-1%	8%
Las Lomitas Elementary	-11%	6%	-1%	29%	0%	-11%
Menlo Park City Elementary	-10%	0%	2%	11%	0%	-15%
Portola Valley Elementary	-2%	4%	0%	19%	0%	-7%
Ravenswood City Elementary	2%	7%	1%	-12%	-2%	2%
Redwood City Elementary	0%	4%	1%	-5%	0%	2%
San Carlos Elementary	-10%	5%	2%	23%	1%	-7%
Woodside Elementary	8%	6%	0%	14%	-1%	-15%
Total	-9%	4%	0%	2%	0%	9%

Notes: The figure shows percentage point gaps in student representation versus faculty/staff representation (calculated as the share of faculty/staff minus the share of students).

Source: California Department of Education and Root Policy Research

Appendix I

State Fair Housing Laws and Regulations

This appendix summarizes key state laws and regulations related to mitigating housing discrimination and expanding housing choice.

California Fair Employment and Housing Act (FEHA) (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2) is the state fair housing law that prohibits those engaged in the housing business—landlords, real estate agents, home sellers, builders, mortgage lenders, and others—from discriminating against tenants or homeowners.

California law protects individuals from illegal discrimination by housing providers based on:

- Race, color
- Ancestry, national origin
- Citizenship, immigration status
- Primary language
- Age
- Religion
- Disability, mental or physical
- Sex, gender
- Gender identity, gender expression
- Marital status
- Familial status
- Source of income
- Military or veteran status

Government Code section 65008. Covers actions of a city, county, city and county, or other local government agency, and makes those actions null and void if the action denies an individual or group of individuals the enjoyment of residence, landownership, tenancy, or other land use in the state because of membership in a protected class, the method of financing, and/or the intended occupancy.

- For example, a violation under Government Code section 65008 may occur if a jurisdiction applied more scrutiny to reviewing and approving an affordable development as compared to market-rate developments, or multifamily housing as compared to single family homes.
- Government Code section 65008, subdivision (e), authorizes preferential treatment of affordable housing

Government Code section 8899.50 requires all public agencies to administer programs and activities relating to housing and community development in a manner to affirmatively further fair housing and avoid any action that is materially inconsistent with its obligation to affirmatively further fair housing.

Government Code section 11135 et seq. requires full and equal access to all programs and activities operated, administered, or funded with financial assistance from the state, regardless of one's membership or perceived membership in a protected class.

Density Bonus Law (Gov. Code, section 65915) requires California jurisdictions to adopt ordinances that specify how density bonuses will be offered to incentivize affordable housing. The state law contains the minimum specifications for density bonuses.

Housing Accountability Act (Gov. Code, section 65589.5) prohibits local agencies from disapproving housing developments, including farmworker housing and emergency shelters, or requiring conditions that make such housing infeasible except under certain conditions specified in the law.

No-Net-Loss Law (Gov. Code, section 65863) is meant to ensure that development opportunities remain available throughout a jurisdiction's regional housing need allocation (RHNA) period, especially for low and moderate income households. It prohibits jurisdictions from lowering residential densities without substantial evidence.

Least Cost Zoning Law (Gov. Code, section 65913.1) requires jurisdictions to designate and zone sufficient vacant land for residential use with sufficient standards in relation to growth projections.

Excessive subdivision standards (Gov. Code, section 65913.2) prohibits jurisdictions from imposing design criteria that make residential development infeasible.

Limits on growth controls (Gov. Code, section 65302.8) describes how flood plains are used in comprehensive planning and zoning.

Housing Element Law (Gov. Code, section 65583, esp. subds. (c) (5), (c) (10) governs state-required housing elements.

Appendix J

Summary of Public Engagement and Community Correspondence

Included in Appendix J:

- a. City of San Bruno Housing Element Workshop – April 8, 2021: Survey Responses
- b. City of San Bruno Housing Element Workshop
 - 1. Workshop #1 White Board Exercise – May 4, 2022
 - 2. Workshop #2 White Board Exercise – May 26, 2022
- c. Survey Data from the City of San Bruno Housing Element Survey which was open from March 3, 2022 to June 24, 2022
- d. 21 Elements Stakeholder Listening Sessions Summary
- e. Community Correspondence received by the city as of June 24, 2022
 - 1. Letter from YIMBY Law – Greenbelt Alliance dated April 21, 2022
 - 2. Letter from San Francisco International Airport dated May 6, 2022
 - 3. Letter from Housing Leadership Council dated June 24, 2022
 - 4. Email from Paul Wapensky dated May 24, 2022

Survey Responses - CCM2 (4.08.21)			
Question (x)	Overall, how would you rate this virtual meeting?	What did you like about the meeting?	Is there anything we could improve?
	4 - Very Good	Good introduction to the subject; seeing the current and expected RHNA numbers was helpful.	
	4 - Very Good	I loved that most people seemed focus on equity and social justice, and serving our lower-income community. That's the whole reason I showed up, I'm glad many others did too!	More time to discuss would have been great, our group was still on a roll when the breakout session ended. Also, the 6-7:30 time is very inconvenient for people with young kids and no other caretakers. Some meetings could be held later to accommodate parents who want to participate.
	1 - Poor		I though the whole point of having various cities in each meeting was to have a mix of perspectives, socioeconomic status, demographics, etc. Breakout rooms for each city COMPLETELY DEFEATED THE PURPOSE.
x	4 - Very Good	The overview was short and to the point, which was good (not too wonky); and the breakout session was good in that Deanna allowed people to ask questions and make comments even though she wanted to get to the questions. It turned out that the questions/comments addressed two of the three questions, and it was good to hear what people needed to understand. For example, how does policy impact housing development?	Include some racial equity analysis/framing, to explain how policy forced and continues to design for segregation (or could lead to inclusion). Use an example or two. % of Menlo Park that is zoned for single family homes and even SFH with minimum lot sizes, for example. Height and density limits in DSP, as another example.
	4 - Very Good	Learning about the demographics of Belmont, its relationship to the median household income, and other economic details about Belmont. I also appreciated learning what Belmont currently has in the housing pipeline and the numbers the hope for in the future.	

x	5 - Excellent	folks brought a positive attitude	I wonder whether actually doing some cross-community conversations would be useful at some point, as well as city breakouts?
	3 - Good	a chance to hear from others in the county	would like the breakouts to be a mixture of cities so we can hear others concerns
	4 - Very Good	N/A	N/A

May 4, 2022 HE Workshop

Whiteboard Activity

What's Working

We have a diverse downtown that is walkable, a great hub to build housing around

We do see a steady stream of people doing stuff like expansions / second floor additions / ADUs to meet housing need for their families.

What's Not

Sometimes arduous permitting process

Downtown seems under developed and a perfect spot close to transit and ECR to put housing

Need more housing around the new Tanforan office development

Single family zoning right next to transit!

We are not making the connection between retail and housing

We theoretically have an excellent plan for our transit corridors, but exactly one building so far has actually been built, in nearly a decade.



Policies and Programs

Production (Policies to get more housing)

Expand TCPI! 👍

Reduce setback requirements - use ALL of a site! 👍

Downtown development

Would it be possible to get pre-auth ADU designs? Like maybe just look at bigger / richer cities that have done that, and straight up steal their designs? :-D 👍

Are we going to run a ballot measure to expand the TCP height-increase zone? 👍

☆
End single family zoning

We need policies beyond the BMR ordinance to require more affordable housing. 👍

Protection (Policies to help existing reside...)

a registry of rental properties would help track where outreach is needed and ensure landlords are told their responsibilities, but realistically it'd be hard for a town this small to do that on our own, it's more a county or state function; we could at least reach out to other cities to try to create pressure for it; Asm Wicks has proposed a state law before

Other

Housing for teachers?

Lower parking minimums / requirements

Outreach to renters - homeowners are dominating the conversation! 👍

5.26.2022 Meeting white board exercise

Policies and Programs

♥ = I love it! 😊 = I'm okay with it 🤔 = I have some concerns 🗨️ = I have big concerns

Program 2-B
Evaluate the possibility of putting forth a ballot initiative to increase buildings heights and number of floors along the El Camino Real corridor.

Can we also explore raising the height limit in R1 and R2 to three stories?

I like this idea but it seems like high effort for low return. This is not a large area.

Should consider what other areas can be swept in, if we're doing this

Program 2-A
Study the El Camino Real corridor to determine sites that may be appropriate to be zoned for residential development or higher density residential.

Program 2-F
Develop a master plan for the redevelopment of Tanforan with a minimum of 1,000 housing units.

Given plans for biotech office this is not going to be enough to have it improve or even not worsen the jobs/housing balance.

1000 units seems like a lot

1000 seems low given all the jobs there

Program 2-H
Release an RFP for a housing development analysis for city-owned sites.

I remember last time the comment was the sites were too small to interest developers but if it means increasing density downtown that would be great.

I don't have an opinion on whether an RFP is needed for this.

Visual representation of feedback for Program 2-H, showing a grid of yellow squares and a vertical column of icons (hearts, smiley faces, and speech bubbles) representing various concerns and support.

Program 3-D
Adopt a policy to retain public land over the long term when possible, doing ground leases rather than selling property (including for affordable housing).

How does this interact with Prop13? If the city owns the site, the city pays tax to the state and then gets some back? But our rental rate to the operator might not be constrained by the 2% growth?

Program 3-C
Establish an ordinance that provides for tenant and community first right of purchase or right of first refusal (TOPA and COPA).

For what kind of units? All units?

Isn't this already effectively required by SB330? at least for cases where existing affordable units get re-done

Program 3-D
Give displaced residents (former residents of the jurisdiction) preferential access to new affordable housing units.

This is fine but since people are out, having them come back is pretty rare.

Which former residents? Displaced when? Why?

If we could include current residents who are at risk of losing their housing that would be great

Program 4-D
Develop policies to encourage affordable housing beyond the Below Market Rate (BMR) requirement.

Encourage, yes, but not require.

There needs to be a balance here - if requiring too many affordable units makes the project unviable we get NO units.

We need more "naturally affordable" units, where the market rate does not rent-burden median workers; covenant-affordable units should be for like the lower quintile.

Program 5-C
Revise the BMR ordinance to ensure that all new affordable housing remains affordable for 99 years or in perpetuity.

This has the same kind of problems as really rigid rent control

This seems unrealistic - a lot can change in 99 years!

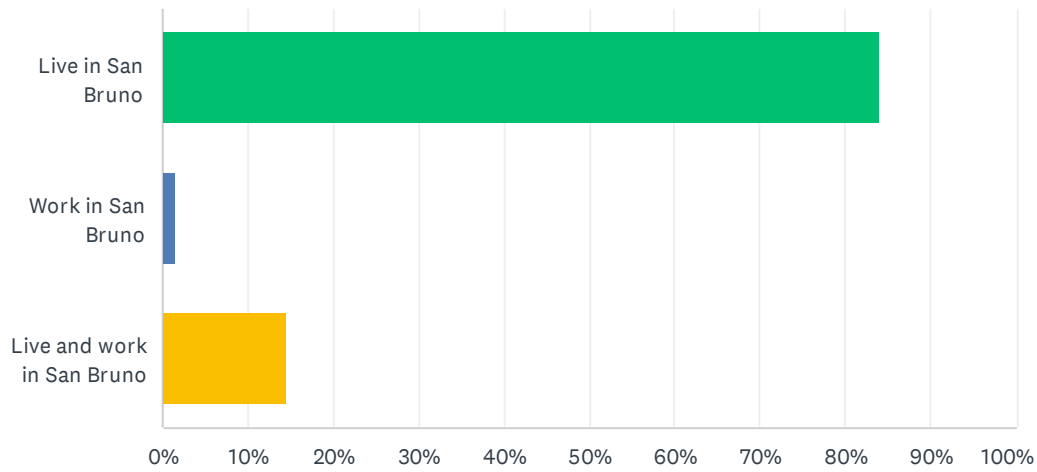
This is a tough one because that might result in a lot of units with deferred maintenance in a few decades.

Program 6-A
Require replacement units for low-income households and below market rate units lost during any construction or demolition projects.

Again this seems like it's already required by SB330

Q1 Do you:

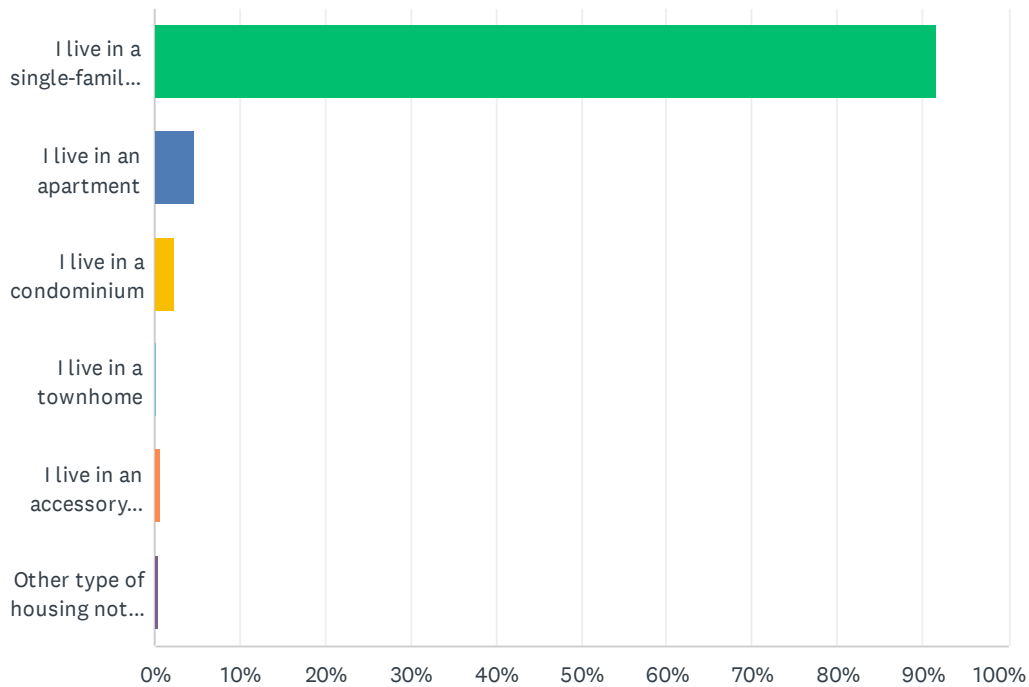
Answered: 444 Skipped: 3



ANSWER CHOICES	RESPONSES	
Live in San Bruno	84.01%	373
Work in San Bruno	1.58%	7
Live and work in San Bruno	14.41%	64
TOTAL		444

Q2 Which best describes your current living situation?

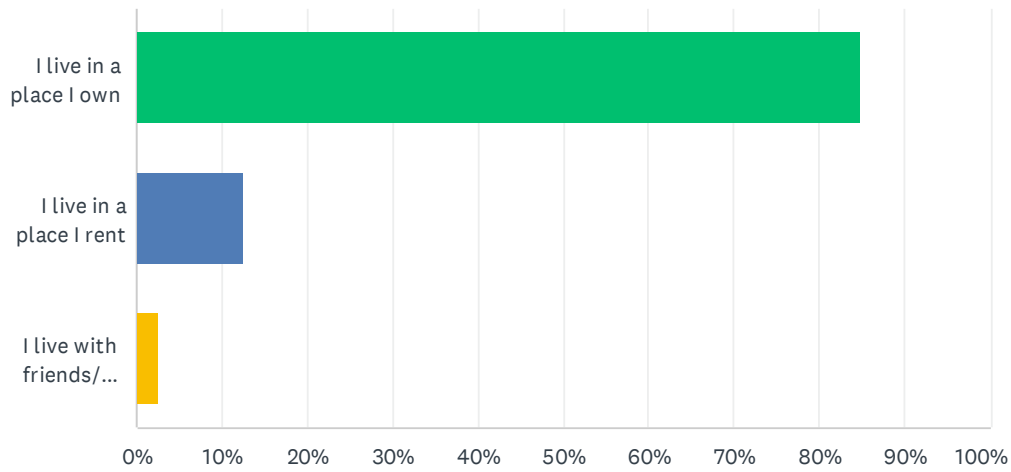
Answered: 445 Skipped: 2



ANSWER CHOICES	RESPONSES	
I live in a single-family home	91.69%	408
I live in an apartment	4.72%	21
I live in a condominium	2.25%	10
I live in a townhome	0.22%	1
I live in an accessory dwelling unit (granny flat/ guest house)	0.67%	3
Other type of housing not listed	0.45%	2
TOTAL		445

Q3 Which best describes your current housing situation?

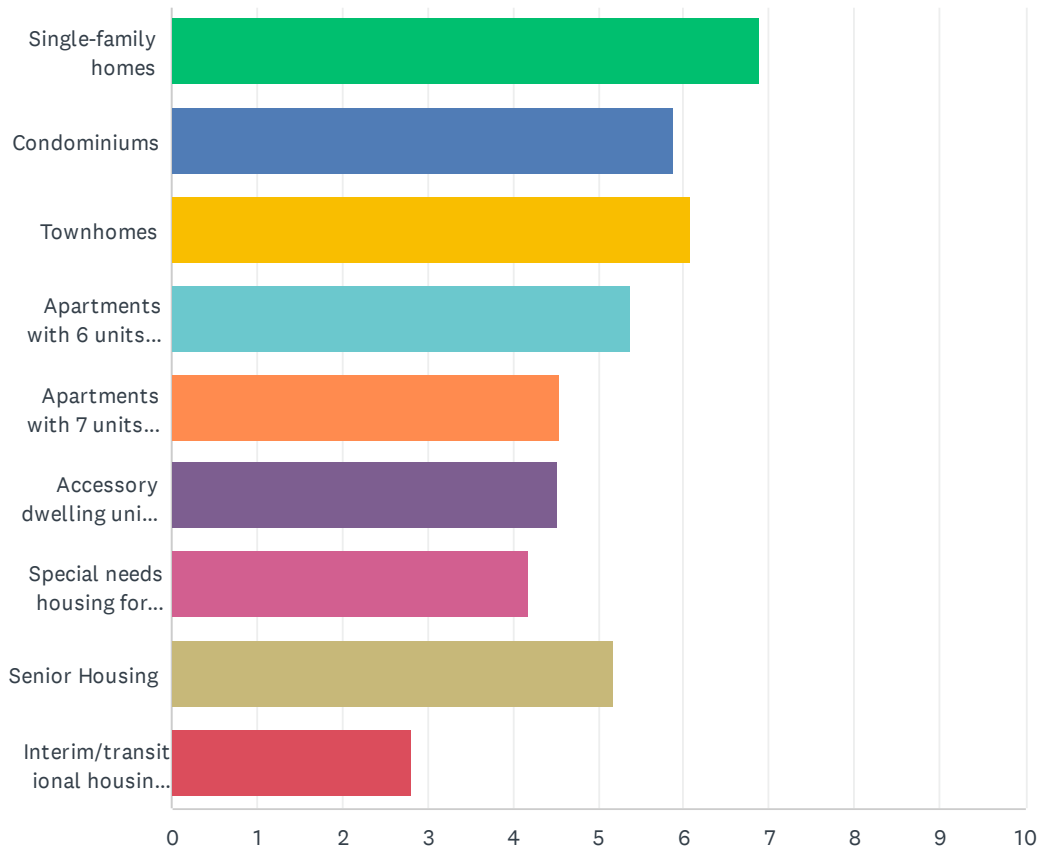
Answered: 444 Skipped: 3



ANSWER CHOICES	RESPONSES	
I live in a place I own	84.91%	377
I live in a place I rent	12.61%	56
I live with friends/ family, and do not own or pay rent	2.48%	11
TOTAL		444

Q4 What types of housing does San Bruno need most? Please rank the following nine housing options in the order you feel is needed most, with #1 being the most needed:

Answered: 440 Skipped: 7

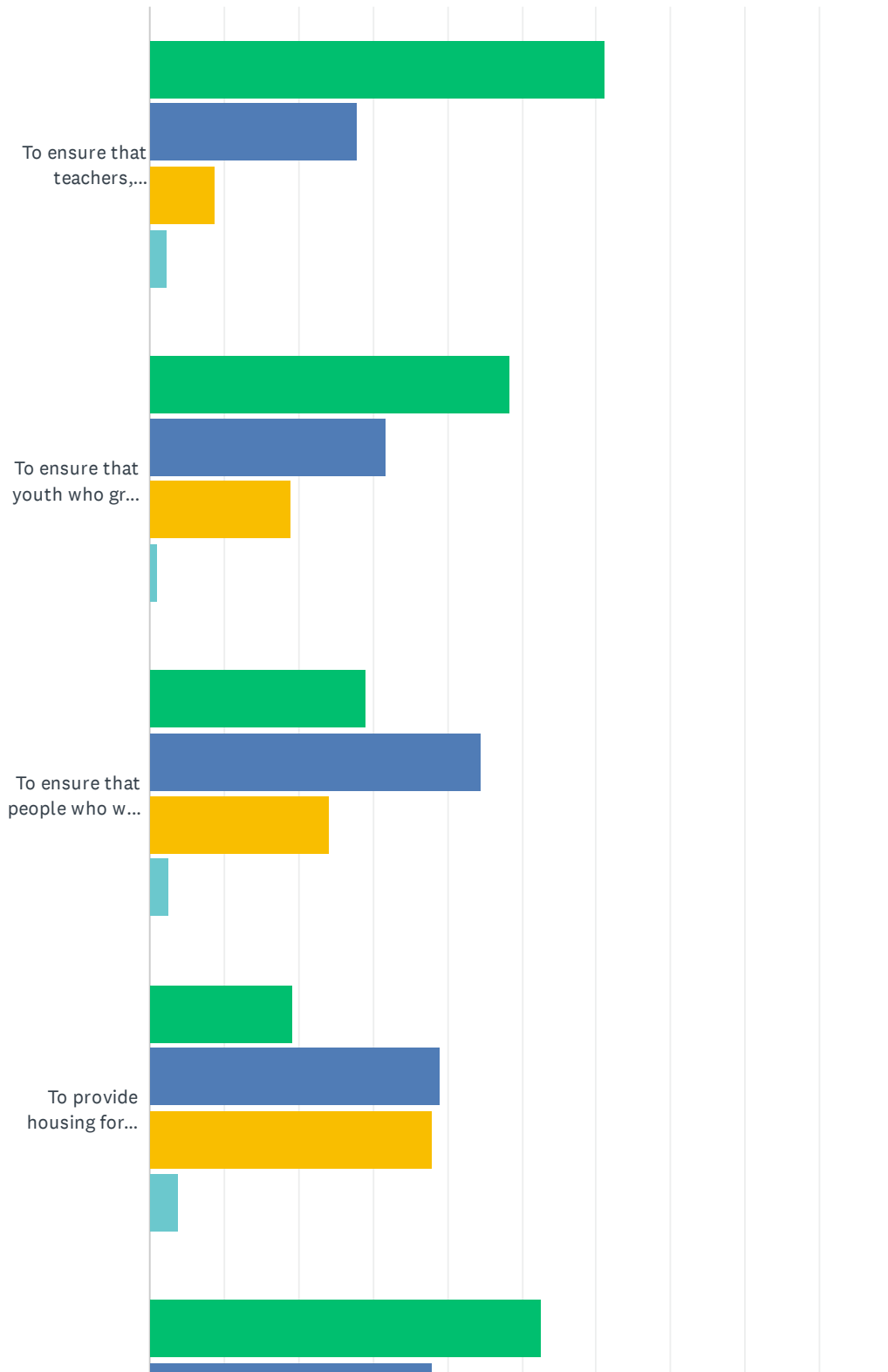


Housing Element Survey #1

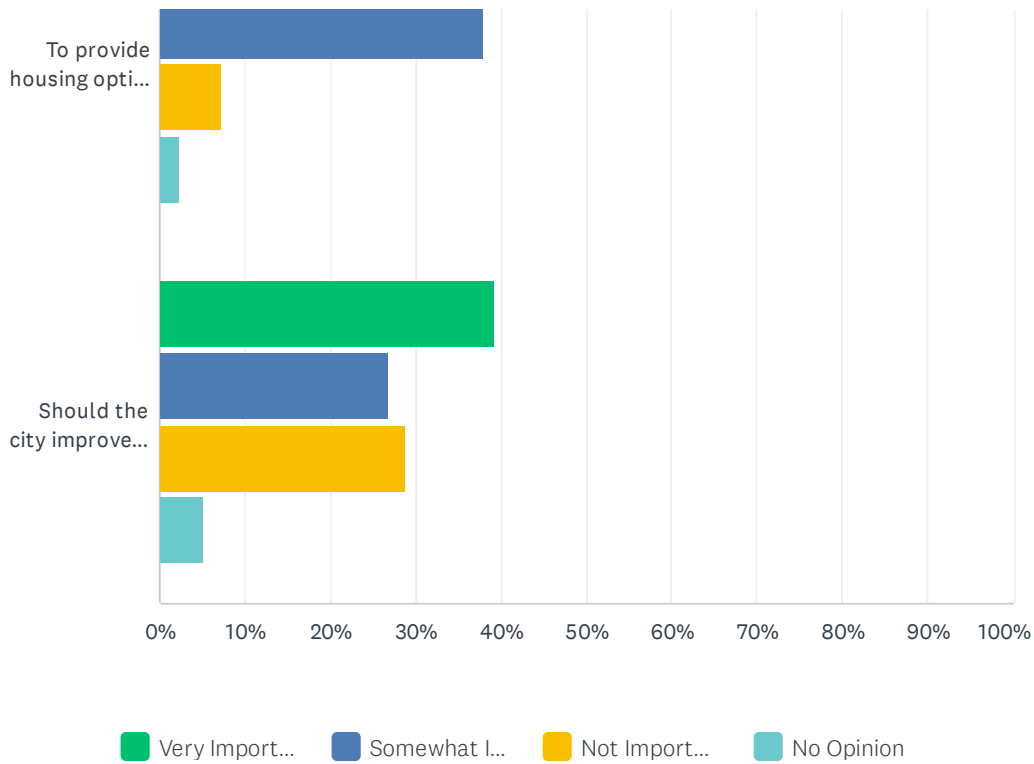
	1	2	3	4	5	6	7	8	9	TOTAL	SCOR
Single-family homes	53.44% 225	9.26% 39	5.46% 23	4.04% 17	4.99% 21	4.28% 18	4.28% 18	2.38% 10	11.88% 50	421	6.
Condominiums	5.35% 22	20.44% 84	25.55% 105	13.63% 56	10.95% 45	5.35% 22	6.81% 28	6.81% 28	5.11% 21	411	5.
Townhomes	5.56% 23	22.95% 95	25.85% 107	15.94% 66	7.73% 32	5.80% 24	5.07% 21	9.18% 38	1.93% 8	414	6.
Apartments with 6 units or less	6.11% 25	10.76% 44	7.58% 31	23.47% 96	20.29% 83	16.14% 66	7.82% 32	4.89% 20	2.93% 12	409	5.
Apartments with 7 units or more	9.76% 40	5.12% 21	6.59% 27	8.78% 36	12.68% 52	21.22% 87	15.12% 62	11.71% 48	9.02% 37	410	4.
Accessory dwelling units (granny flat/ guest house)	4.91% 20	9.58% 39	6.88% 28	9.34% 38	16.46% 67	16.71% 68	15.48% 63	11.30% 46	9.34% 38	407	4.
Special needs housing for families and individuals who need supportive services like jobs training and social services	5.83% 24	6.55% 27	7.52% 31	6.55% 27	10.68% 44	12.14% 50	24.03% 99	20.15% 83	6.55% 27	412	4.
Senior Housing	8.65% 36	14.42% 60	12.26% 51	12.74% 53	10.10% 42	9.38% 39	12.02% 50	17.55% 73	2.88% 12	416	5.
Interim/transitional housing for people looking to transition from homelessness	4.89% 20	3.18% 13	3.91% 16	5.62% 23	4.89% 20	7.33% 30	7.09% 29	12.96% 53	50.12% 205	409	2.

Q5 Please rank the importance of current housing challenges in San Bruno by indicating whether the following are very important, somewhat important, not important or don't know:

Answered: 445 Skipped: 2



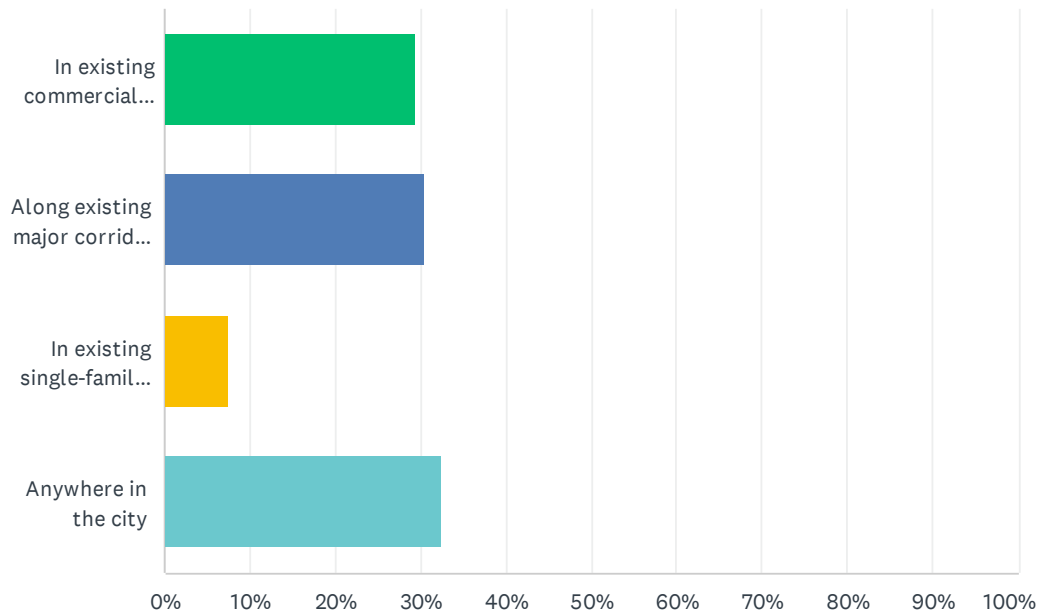
Housing Element Survey #1



	VERY IMPORTANT	SOMEWHAT IMPORTANT	NOT IMPORTANT	NO OPINION	TOTAL
To ensure that teachers, police, fire, and related safety workers can afford to live in San Bruno	61.12% 272	27.87% 124	8.76% 39	2.25% 10	445
To ensure that youth who grow up in San Bruno can afford to live in San Bruno when they are adults	48.31% 215	31.69% 141	18.88% 84	1.12% 5	445
To ensure that people who work at downtown businesses can afford to live in San Bruno	28.99% 129	44.49% 198	24.04% 107	2.47% 11	445
To provide housing for professionals working in San Bruno office parks	19.10% 85	39.10% 174	37.98% 169	3.82% 17	445
To provide housing options for seniors who want to downsize while remaining in San Bruno	52.58% 234	37.98% 169	7.19% 32	2.25% 10	445
Should the city improve land use policies to allow for housing types in addition to single-family homes to be built	39.14% 173	26.92% 119	28.73% 127	5.20% 23	442

Q6 Where should the city focus on increasing housing?

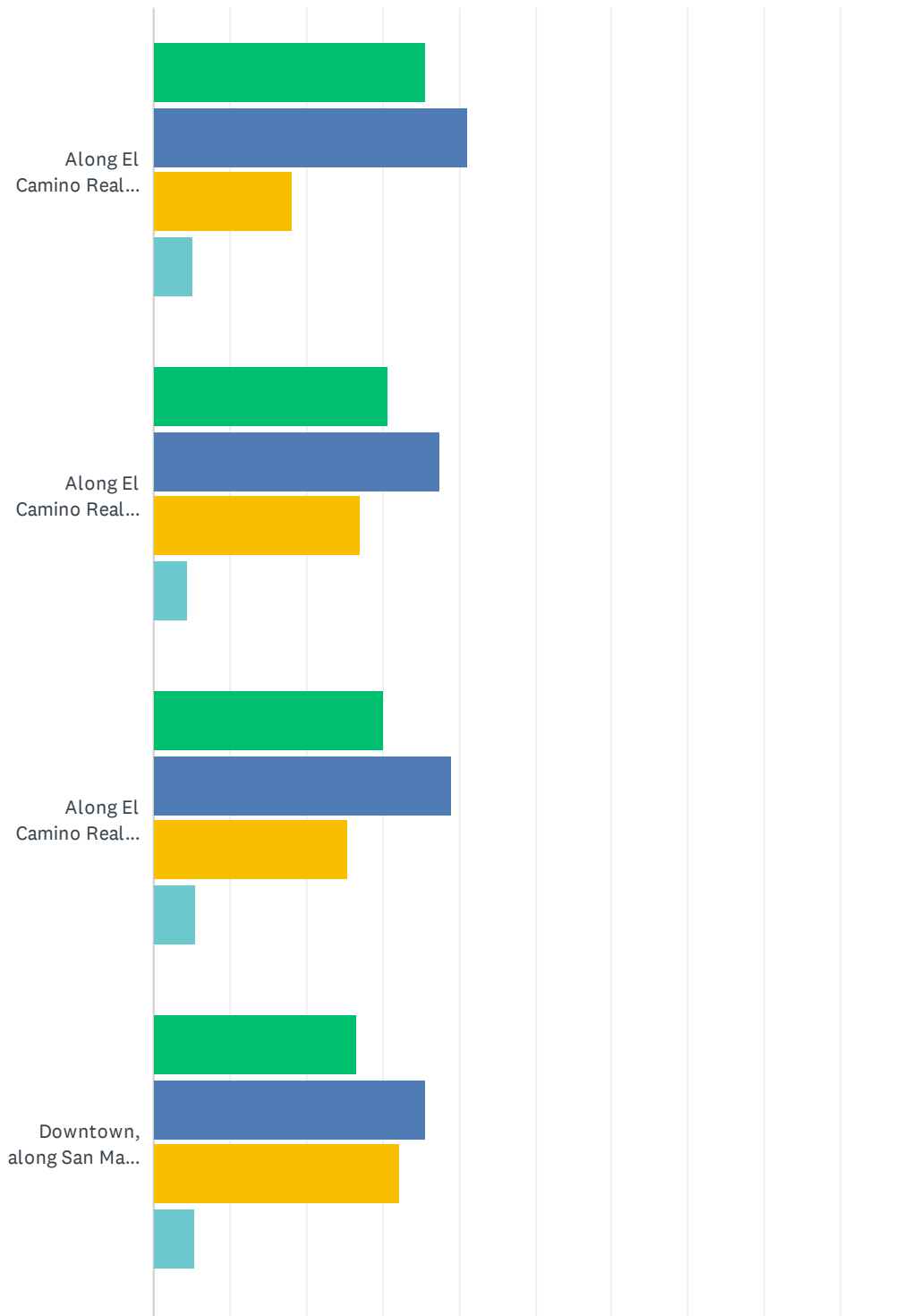
Answered: 425 Skipped: 22



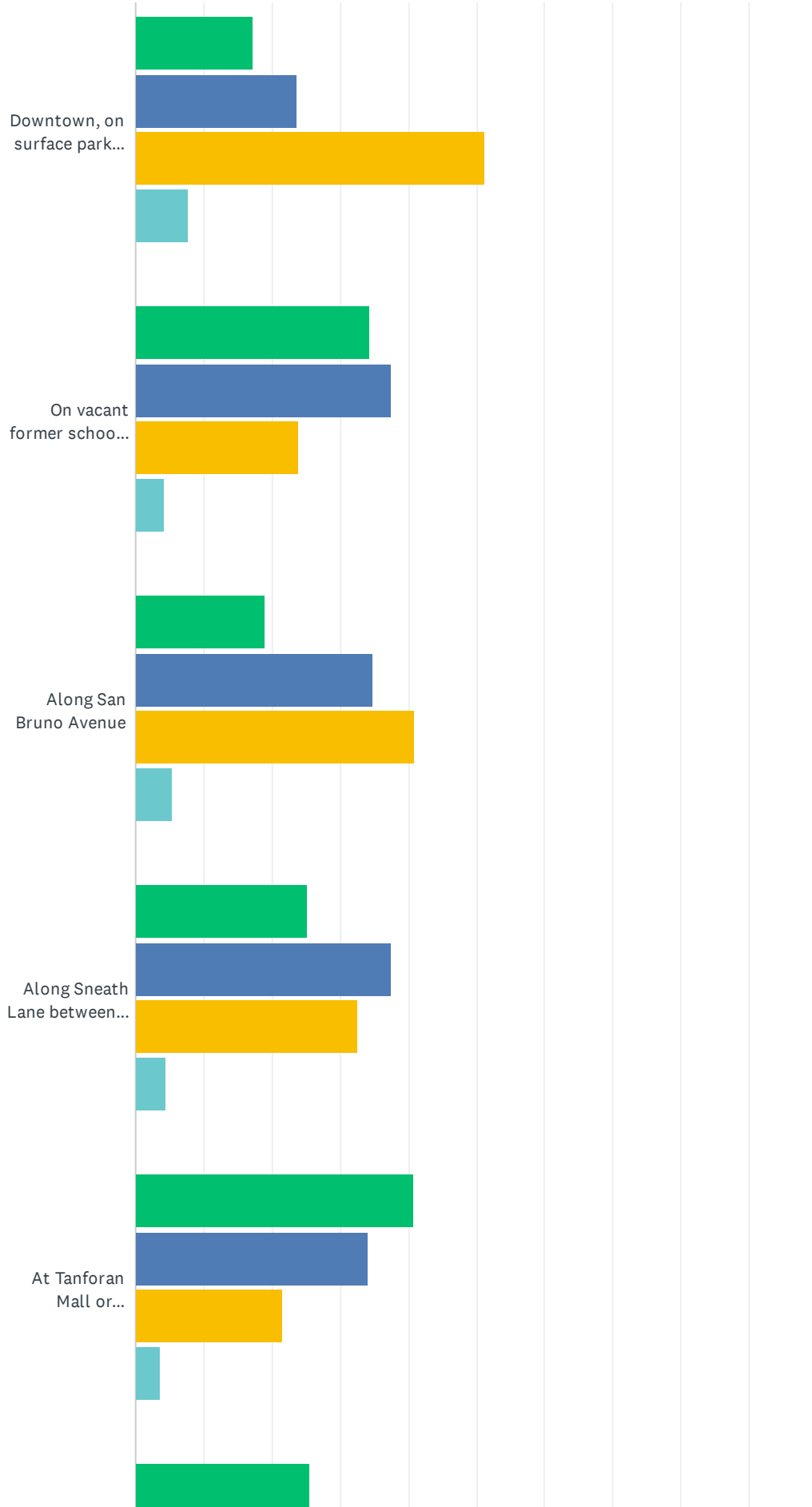
ANSWER CHOICES	RESPONSES	
In existing commercial areas	29.41%	125
Along existing major corridors (San Bruno Avenue, El Camino Real, San Mateo Avenue)	30.59%	130
In existing single-family areas	7.53%	32
Anywhere in the city	32.47%	138
TOTAL		425

Q7 To meet the City's long-term housing needs, the city will need to plan for more homes. This includes single-family homes as well as apartments, townhomes, Accessory Dwelling Units (ADU's) and condominiums. Please indicate if you Highly Support, Support, Don't Support housing in the following areas:

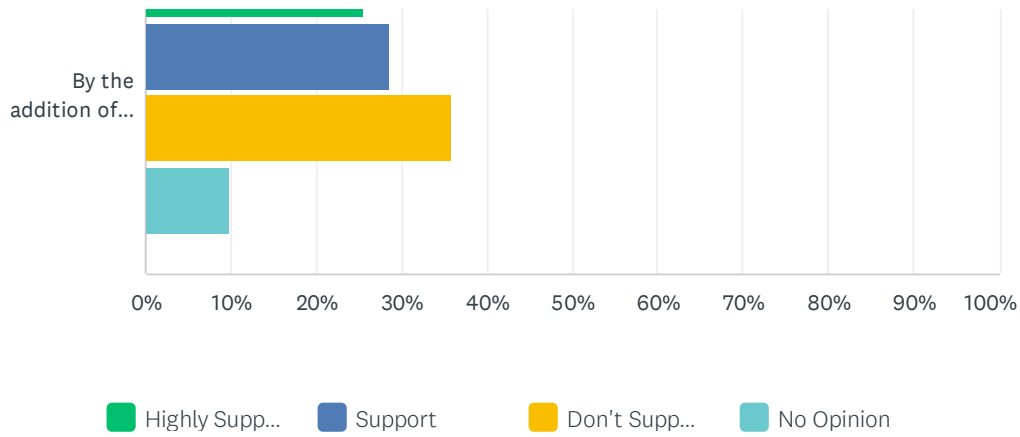
Answered: 447 Skipped: 0



Housing Element Survey #1



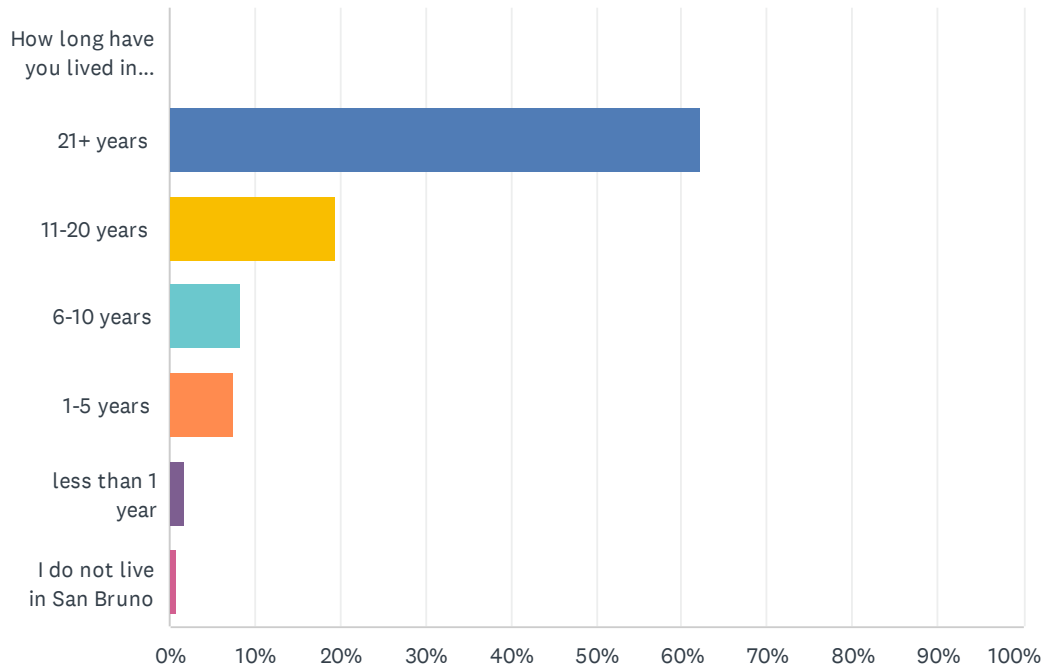
Housing Element Survey #1



	HIGHLY SUPPORT	SUPPORT	DON'T SUPPORT	NO OPINION	TOTAL	WEIGHTED AVERAGE
Along El Camino Real from Highway 380 north to South San Francisco	35.52% 157	41.18% 182	18.10% 80	5.20% 23	442	1.93
Along El Camino Real between Highway 380 extending south to San Mateo Avenue	30.77% 136	37.56% 166	27.15% 120	4.52% 20	442	2.05
Along El Camino Real extending south between San Mateo Avenue to the Millbrae Border	30.16% 133	39.00% 172	25.40% 112	5.44% 24	441	2.06
Downtown, along San Mateo Avenue	26.64% 118	35.67% 158	32.28% 143	5.42% 24	443	2.16
Downtown, on surface parking lots	17.31% 76	23.69% 104	51.25% 225	7.74% 34	439	2.49
On vacant former school sites	34.31% 152	37.47% 166	23.93% 106	4.29% 19	443	1.98
Along San Bruno Avenue	18.91% 83	34.85% 153	41.00% 180	5.24% 23	439	2.33
Along Sneath Lane between Interstate 280 and El Camino Real	25.23% 111	37.50% 165	32.73% 144	4.55% 20	440	2.17
At Tanforan Mall or portions of Towne Center	40.67% 181	34.16% 152	21.57% 96	3.60% 16	445	1.88
By the addition of Accessory Dwelling Units (ADU's) in Single-Family neighborhoods	25.68% 114	28.60% 127	35.81% 159	9.91% 44	444	2.30

Q8 About You. The following questions are optional, but will assist the city greatly in understanding respondents to this survey. Responses are confidential and will only be presented in tabulated form:

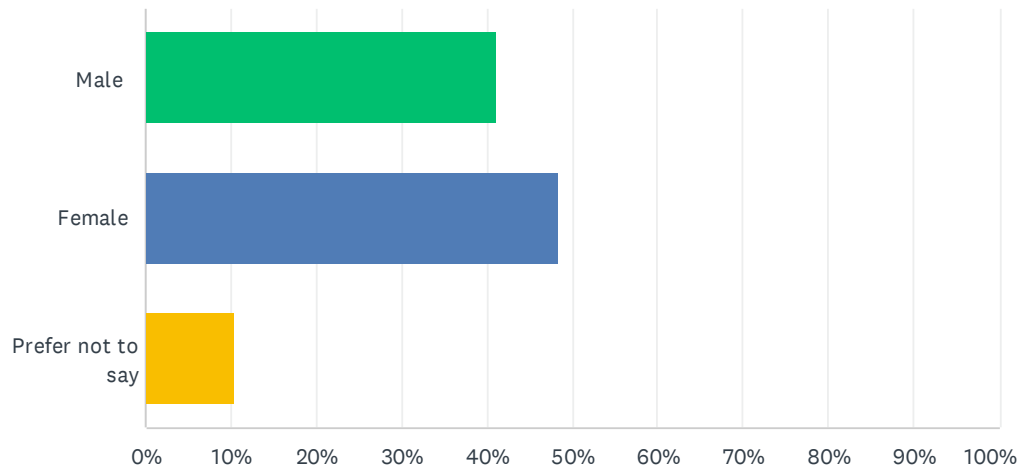
Answered: 444 Skipped: 3



ANSWER CHOICES	RESPONSES	
How long have you lived in San Bruno?	0.00%	0
21+ years	62.16%	276
11-20 years	19.37%	86
6-10 years	8.33%	37
1-5 years	7.43%	33
less than 1 year	1.80%	8
I do not live in San Bruno	0.90%	4
TOTAL		444

Q9 Please indicate your gender.

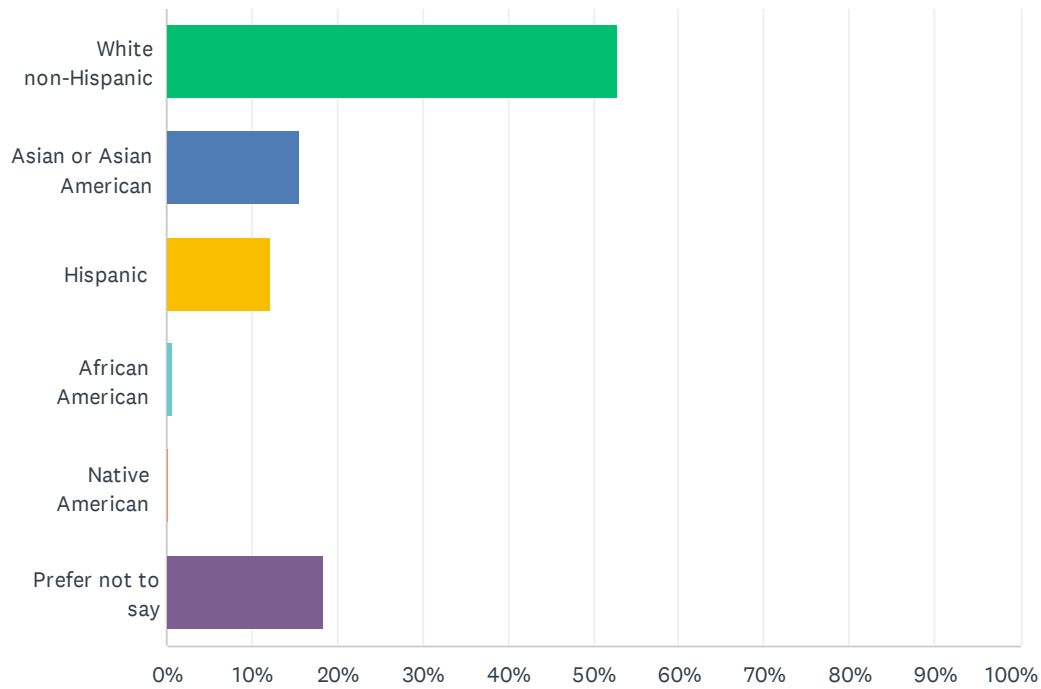
Answered: 438 Skipped: 9



ANSWER CHOICES		RESPONSES
Male		41.10% 180
Female		48.40% 212
Prefer not to say		10.50% 46
TOTAL		438

Q10 How do you identify yourself? (Select all that apply)

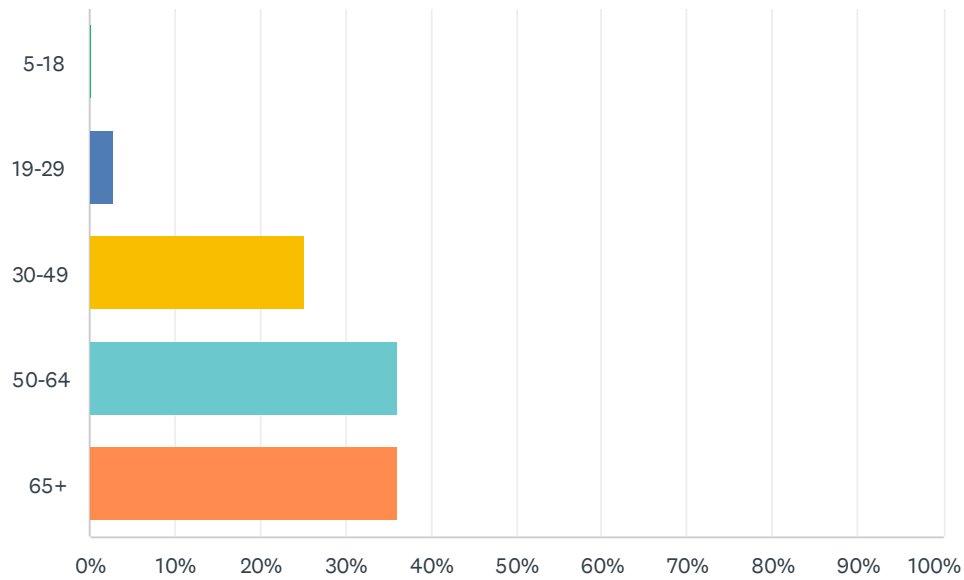
Answered: 441 Skipped: 6



ANSWER CHOICES	RESPONSES	
White non-Hispanic	52.83%	233
Asian or Asian American	15.65%	69
Hispanic	12.24%	54
African American	0.68%	3
Native American	0.23%	1
Prefer not to say	18.37%	81
TOTAL		441

Q11 What is your age group?

Answered: 439 Skipped: 8



ANSWER CHOICES	RESPONSES	
5-18	0.23%	1
19-29	2.73%	12
30-49	25.06%	110
50-64	35.99%	158
65+	35.99%	158
TOTAL		439



MEETING SUMMARY

Countywide Stakeholder Listening Session #1

Fair Housing

9/27/2021, 1-2:30 pm on Zoom

Executive Summary

On September 27, 2021, 21 Elements hosted a housing element stakeholder listening session with organizations focused on fair housing issues, including:

- the Center for Independence of Individuals with Disabilities,
- Community Legal Services of East Palo Alto,
- the Housing Equality Law Project,
- Legal Aid for San Mateo County, and
- Project Sentinel.

Detailed information about speakers and attending jurisdictions is below. 21 Elements' AFFH (Affirmatively Furthering Fair Housing) consultant, Heidi Aggeler from Root Policy, also made some opening remarks and participated in the discussion.

Key themes included:

- Concern about the upcoming end of the eviction moratorium,
- The importance of transit-oriented affordable housing and stronger anti-displacement policies,
- The need for more education around accessibility regulations and reasonable accommodation, and
- The ability of jurisdictions to use their platform (including jurisdiction websites) to promote education and resources for tenants and landlords.

Stakeholder Presenters & Additional Resources

Center for Independence of Individuals with Disabilities (<https://www.cidsanmateo.org/>)
Benjamin McMullan, Systems Change Advocate, benjaminm@cidsanmateo.org

Community Legal Services of East Palo Alto (CLSEPA) (<https://clsepa.org/>)
Michelle Trejo-Saldivar, Law Fellow, Housing Program, mtrejosaldivar@clsepa.org
CLSEPA's COVID assistance website: <https://www.youarecommunity.org/>



Housing Equality Law Project (<http://www.housingequality.org/>)

Mary Prem, Executive Director, mprem@housingequality.org

Legal Aid for San Mateo County (<https://www.legalaidsmc.org/>)

Shirley Gibson, Directing Attorney, SGibson@legalaidsmc.org

Project Sentinel (www.housing.org)

Ann Marquart, Executive Director, AMarquart@housing.org

Housing Choices (presented at a prior meeting) (<http://www.housingchoices.org/>)

Jan Stokley, Executive Director, jan@housingchoices.org

Kalisha Webster, Housing Advocate, kalisha@housingchoices.org

Public Interest Law Project (unable to attend) (<http://www.pilpca.org/>)

Michael Rawson, Director, mrawson@pilpca.org

Root Policy Research (AFFH consultant to 21 Elements) (www.rootpolicy.com)

Heidi Aggeler, Managing Director, heidi@rootpolicy.com

Jurisdictions in attendance:

Belmont	Millbrae	San Mateo (County)
Brisbane	Pacifica	South San Francisco
Burlingame	Portola Valley	Woodside
Daly City	Redwood City	
East Palo Alto	San Bruno	+ California Department of
Half Moon Bay	San Carlos	Housing and Community
Menlo Park	San Mateo (City)	Development (HCD)

Key Themes and Actions

- **Eviction Moratorium:** There was widespread concern about what will happen when the California eviction moratorium ends on October 1, 2021. Just Cause eviction ordinances and Covid rent relief (especially for back rent) have been important to keep people in their homes. CLSEPA shared a flyer after the session with a summary of renters' rights and resources.
- **Vulnerable Populations:** The stakeholder groups shared several details about the housing needs of the most vulnerable populations.



- People with disabilities experience the most housing discrimination. Legal assistance organizations get the most calls regarding discrimination against people with and find it is the most misunderstood category.
 - Displacement disproportionately affects Latinx, African American/Black households and families with children.
 - Many or most evictions are no-fault evictions, *not* evictions resulting from a failure to pay rent.
- **Anti-Displacement Policies:** Jurisdictions were curious about which anti-displacement policies were favored by the stakeholder groups.
 - **Affordable housing:** More subsidized affordable housing is needed. Stakeholders noted that it is key to locate affordable housing in places located on transit or with good access to transit.
 - **Just Cause protections, rent stabilization:** While there are some baseline protections at the state level, they need to be strengthened. The rent gauging gap does not go far enough to protect lower-income households.
 - **TOPA and COPA:** Currently, there is significant interest in Tenant and Community Opportunity to Purchase Act policies that give tenants and nonprofits a first right to purchase or a right of first refusal when a property goes on the market.
 - **Rent registries:** Stakeholders noted that a rental registry is important in order to obtain data that can be used to inform anti-displacement policies, but it is not an anti-displacement policy on its own.
 - **Section 8 vouchers:** Stakeholders noted that while vouchers can provide opportunities for lower-income households to live or remain in the county, there are not enough vouchers to meet the need. In addition, vouchers have resulted in some concentration of low-income households in areas with less economic and educational opportunity.
 - **Accessory dwelling units:** ADUs are a great housing solution in the suburbs, as they provide suburb-appropriate density along with a good quality of life and provide more affordable options without requiring subsidy.
 - **Accessibility:** Cities' housing elements typically only have the minimum standard/generic language for accessibility. Some of the participating jurisdictions indicated an interest in doing more and are looking for examples of cities going beyond what is required.
 - Cities should be prominently promoting organizations working with tenants. City websites get the most visibility out of any form of advertisement/media
 - Jurisdictions were very interested in data that quantifies the existing supply of accessible housing and the demand for accessible housing.
 - Stakeholders suggested that affordability and accessibility issues must be considered together.
 - Transit-friendly locations are key for people with disabilities.



- Stakeholders noted that “visitability” policies – making sure homes allow for access to those who are visiting – are less common today and should be considered. Consider requiring some degree of accessibility and visitability in new homes.
 - Accessibility requirements (or lack thereof) for new townhomes were a point of concern for stakeholders.
- **Reasonable Accommodation:** The speakers indicated that there is widespread confusion about the meaning of reasonable accommodation. They shared ideas that could help educate residents and landlords.
 - Building departments should be posting reasonable accommodations policies.
 - Education for and outreach to apartment managers, property owners and homeowner associations is needed.
- **Ideas for Action:**
 - Hire someone to do an audit of each jurisdiction’s website for reasonable accommodation policies.
 - Improve jurisdiction websites to give a more prominent platform to organizations that work with tenants on fair housing issues.
 - Create a program to rent ADUs to people who really need housing (maybe run by HIP Housing).
 - Look at SB 9 and how it may impact the creation of duplexes that may or may not be accessible.
 - Identify examples where cities go beyond the standard accessibility language in housing elements.
 - Find data that quantifies the need for accessible housing (and the existing supply).



Appendix: Raw Notes

Room 1 (Josh) Notes:

Ben McMullan – CIID

1. Areas that can use work
2. Inaccessible new house – Many are built in town homes. There is a lack of visibility. No ground floor restroom. One bedroom on ground floor.
 - a. Restroom on ground floor
 - b. Access to kitchen
3. All new construction be accessible and visitable
4. Encourage more ADUs
5. Funding for home repairs for people with disability
6. Affordability
7. Mary to circle back with best practices for policies
 - a. Report on where there are systemic violations
8. Education on reasonable accommodation for cities and apartment managers
 - a. Require they take localized training

Ann Marquart – Project Sentinel

1. Tenant landlord
2. Mediation
3. Special emphasis
4. More visibility for fair housing
5. Make it clear how to make it more visible
6. Post reasonable accommodation
7. Most complaints about discrimination of disability
8. Reforms coming to service/companion animals rules
9. Companion animals have same civil rights protections
10. Many property owners do not understand laws
11. The lack of affordable housing
12. People are very worried about Oct 1 and after emergency rental restrictions end
13. Biggest issue with reasonable accommodation - landlords

Shirley – Legal Aid

1. Eviction data from Legal Aid and EPA Legal Aid are based on that data
2. Black, Hispanic and families with children are the most hard-hit
3. It's not a crisis of nonpayment, it is many no-fault evictions
 - a. Even more disproportionately hitting black, Hispanic and children
4. Had the benefit of expanded just cause for 18 months. Been helpful.



5. Goals – strengthen no fault protections
6. “We don’t need data to figure out if there is a problem. We know there is a problem”
7. Rent registry does not prevent displacement, but data is useful, and as part of that lets get data about displacement
8. Covid rules did not cause the sky to fall
9. There are hotspots about how to use vouchers, there has been limited areas where vouchers getting used
 - a. But many of these are not in areas of opportunities
10. Time limited vouchers less useful
11. Make sure there are not group home discrimination
12. Post reasonable accommodation clearly

Michele – CLESPA

1. Just cause protections. They help tenants and inform tenants
2. Better rent stabilization
3. COPA/TOPA – Help displacement

Room 2 (Kristy) Notes:

- Ben McMullan - Center for Independence of Individuals with Disabilities
 - Advocate with housing, also look at transportation and health care issues
 - Biggest issues: Lack of affordable, accessible housing
 - Like to encourage affordable housing
 - On transit lines, near transit
 - Q from Nancy - with more power shutoffs, fire evacuation, etc. happening these days, for units not on the 1st floor, how is that being addressed?
 - PSPS (Public Safety Power Shutoff) program where help distribute backup power packs for people dependent on power
- Ann Marquart - Project Sentinel
 - More affordable housing
 - Disability is the protected category that they get the most calls about, and is the most misunderstood
 - Want housing next to transportation
 - Protected categories
 - Race
 - National origin
 - Gender
 - Families
 - Section 8 (NEW)
 - There is now fair housing protection for Section 8
 - But concern is that there are not enough certificates to go around, years of waiting lists, etc.



- Criminal history (is a little different)
 - Q from Jennifer Rose: would be beneficial to all of the cities if you came up with collective wish-list of actions! Funding, help with promotion, policies, etc.
 - Ann: Promote fair housing groups in big letters on a lot of city websites, give agencies a bigger platform
 - For example, for first-time homebuyer training in San Jose, the only promotion was a notice on the city's website, and it became clear that people go to city websites for information! Distributing flyers, holding zoom workshops - can only go so far, reach some people.
 - Suggestion: "How can we promote project sentinel"
 - HIP housing helped write language in last housing element (?)
- Mary Prem - Housing Equality Law Project
 - Full service
 - Focused on unserved or underserved areas
 - Investigate complaints
 - Counsel tenants
 - Accessible housing
 - Not just accessibility but visitability
 - New construction (townhomes)
 - Housing solutions for people seeking reentry
 - Worked with SF city and human rights commission on "unchecking the box"
 - Add more ADUs
 - housing is such a scarcity
 - More affordable solution
 - Greater life experience for people living in suburbs, not as dense
 - Really important that accessible housing is located near transit
- Michelle Trejo-Saldivar - Community Legal Services of East Palo Alto (CLSEPA)
 - San Mateo County, plus Mountain View
 - Especially serve low income, very low income, LatinX
 - Housing needs: stronger rent stabilization policies, just cause protections
 - There is a state just cause and rent control, but there is a need for stronger policies
 - TOPA and COPA policies, other anti-displacement policies
 - Low income populations know where they will find affordable housing and where they will not: Recommendation jurisdictions take a look at where LI and VLI people live - they should only be paying 30% of income - where should we be pushing more affordable housing development
- Shirley Gibson - Legal Aid of San Mateo County
 - Similar mission and population served as CLSEPA
 - But only San Mateo County
 - The 2 organizations share information across 2 organizations (Tableau), lots of data at fingertips



- Why are these policies necessary from fair housing standpoint
 - Displacement falls squarely and disproportionately on Black and Latinx households, households with children
 - Disproportionality is even bigger when you look at no-fault termination evictions (*not* failure to pay rent)
- Biggest barriers to housing choice?
 - We heavily rely on housing choice vouchers - unfortunately have managed to isolate and concentrate those tenants in areas of low economic and educational opportunity
 - We must take a reality check: time-limited vouchers that transition people from homelessness to permanent opportunity are not working. It's a revolving door because there isn't enough time to stabilize households
 - Look at how housing vouchers are administered and distributed
- Note that while a rent registry is an interesting source of data, and it is great to have more info, it is NOT a anti-displacement policy in itself. Can use the data (which is better if you require data from landlords) to inform and structure more robust anti-displacement policies: looking at turnover, tenancy, how often, why

Room 3 (Vu-Bang) Notes:

- Mary Prem, Housing Equality Law Project
 - Visitable housing units with accessibility on the ground floor unless there's an elevator to other floors
 - Serve areas that are deemed unserved, areas not covered by fair housing
 - Investigate fair housing complaints
 - Training housing providers for more affordable housing
 - Collaborate with UC Berkeley - race studies in high school
 - City of SF- unchecking the box - re-entry housing programs, previously incardinated
 - Reasonable accommodations denial and other accessibility issues are most common work
 - New construction, esp around transportation hub - housing that's in townhome and not "visitable" (no toilet in common area, no elevators)
 - Affordability and availability biggest concern - ADU units encouraged
 - Topic brought up with jurisdictions but haven't seen adopted
 - Affordability and availability for housing
 - Congestion on highways and accessibility in hubs
- Michelle Trejo-Salvidar
 - Just Cause protections - provide tenants with their rights when tenant gets notice
- Shirley Gibson
 - Be wary of full scale models of Just Cause - can pick and choose from model ordinances to shore up the weak Just Cause ordinances
- Ann Marquart, Project Sentinel



- Disability and familial status got the most complaints - reasonable modifications, can go to CID to pay for modifications, VA will pay for some of those repairs. Reasonable Accommodations - companion/service animals (anyone giving the certificate now has to note how many hours of therapy), different parking space, reminder to pay the rent,
- Policies: wishlist - something to protect tenants after the moratoriums and now focused on back rents
- Something (not rent control) - new housing near transportation
- Education - getting word out to housing providers, raise Project Sentinel to larger visibility so people can find them
- What cities have the best visibility to Project Sentinel - will follow up.
- Section 8 renters - no discrimination
- Landlord should not evict everyone in the household after domestic disturbances
- Ben McMullan
 - Systems change for Center for Independence of Individuals with Disabilities
 - San Bruno, SSF, County offices
 - Visitability - wheelchair and mobility devices can adequately visit. Not many obstacles on different levels - Home Modification Program that people can take advantage of. Having new housing be accessible from the get-go
 - Plug for transit oriented housing - people with disabilities face needing housing and transit.
 - Explore transit oriented housing - vastly great step forward
 - Paratransit coordinating chair on SamTrans and CalTrain accessibility advisory committee
 - Biggest barriers to housing for vulnerable households - affordable and accessible housing. If it's affordable and not accessible, it only goes so far, and vice versa.
- Burlingame - has standard language on accessibility - want to know what language to use to go above and beyond. Townhouse units esp have concerns with. Set up well for TOD, but linking TOD + Accessibility + Affordability . SB9 - two flats or 2 townhouses preferred when it comes to accessibility.
- Hillsborough – language is generic, actual implementation only on ADUs, but predominantly single family housing. Transportation corridor only on El Camino Real and ½ mile from Burlingame Caltrain station.
- Jan (HCC): Physical accessibility is not the only type of accessibility barrier--I am thinking of people with cognitive disabilities--they shouldn't be left out of the discussion.



MEETING SUMMARY

Countywide Stakeholder Listening Session #2: Housing Advocates

10/18/2021, 1-2:30 pm on Zoom

Overview

On October 18, 2021, 21 Elements hosted the second of four housing element stakeholder listening sessions with housing advocacy organizations. A majority of 21 E jurisdictions attended the listening session. Five stakeholder advocate groups introduced themselves and spoke about their group's interest in the Housing Element process. Detailed information about speakers and attending jurisdictions is below and in the appendix.

Key themes included:

- Ongoing outreach needed to underserved and diverse communities
- Production of new housing is critical to the SMC workforce
 - Greatest need for deeply affordable housing, dense, infill
- Connecting labor, environment and equity to housing
- Rent increases are a primary concern
- Protecting vulnerable renting populations with assistance from the governments

Policies & Programs to consider:

- Additional funding for affordable housing through commercial linkage fees, inclusionary zoning, vacancy tax, sales tax, etc.
- Protections: eviction assistance, anti-harassment measures, stronger just cause, tenant right-to return, relocation assistance, improvements to the building inspection process, rental registries as a tool
- Production: Increase density within existing communities in non-high fire severity zones, eliminating harmful restrictions on density, eliminating parking minimums, streamlining housing building process, fair and inclusive zoning policies
- Prioritize BIPOC families in housing policies, outreach and practice (all stages of the practices)
- Manage the threat of climate risk by adding green infrastructure.



Stakeholder Presenters & Additional Resources

Organization	Speaker Name	Contact
Housing Leadership Council	Angela Solis	asolis@hlcsmc.org
Faith in Action	Nani Friedman	nani@faithinactionba.org
Greenbelt Alliance	Zoe Siegel	zsiegel@greenbelt.org
San Mateo County Central Labor Council	Rich Hedges	hedghogg@ix.netcom.com
Peninsula for Everyone	Jordan Grimes	jordangrimes@me.com
San Mateo County Association of Realtors	Gina Zari (invited, unable to attend)	gina@samcar.org

Learn more about Greenbelt Alliance's endorsement program: <https://www.greenbelt.org/climate-smart-development-endorsement-program/>

Learn more about Greenbelt Alliance's Resilience Playbook: <https://www.greenbelt.org/resilience-playbook/>

Full list of Greenbelt Climate Policies can be found in the draft housing element playbook (under policies tab) <https://coda.io/@gazoe-siegel/housing-element-toolkit>

For those who wish to learn more about the focus groups in Redwood City that Trinidad from Faith in Action mentioned,, you can read the report here (posted on the City of Redwood City website): <https://www.redwoodcity.org/home/showpublisheddocument/23755/637623096709130000>

Faith in Action supported with two other reports (tenant protections and preservation), found here: <https://www.redwoodcity.org/departments/city-manager/housing-services/housing-policies/anti-displacement-strategic-plan>

Note Faith in Action works mostly with renter leaders in Daly City, San Mateo and Redwood City, but they have a presence in several other cities in the county as well.

Jurisdictions in Attendance:

Atherton
Brisbane
Burlingame
Daly City
East Palo Alto
Foster City

Half Moon Bay
Menlo Park
Millbrae
Pacifica
Redwood City
San Bruno

San Mateo (City)
San Mateo (County)
South San Francisco
Woodside

+HCD



Key Themes and Actions:

Themes

- Ongoing outreach needed to underserved and diverse communities
- Production of new housing is critical to the SMC workforce
 - Greatest need for deeply affordable housing, dense, infill
- Connecting labor, environment and equity to housing
- Rent increases is a primary concern
- Protecting vulnerable renting populations with assistance from the governments
 - Rental registries, eviction assistance, section 8 availability, anti-harassment measures.

Questions/Discussion

- How do you best balance providing adequate living wages for construction workers with keeping housing units affordable?
 - Fair labor is critical to the building process
- Who should operate rental registries (city, county, nonprofit?)
 - Administered by RWC city staff
- Potential policies prioritizing BIPOC
 - Understand needs of BIPOC communities throughout the process
 - Understand displacement policies
 - More housing in transit rich corridors
- Section 8 Vouchers
 - How to increase the availability
- Housing as a benefit to the community/not extracting from it



Appendix: Additional Stakeholder Information & Input

- **Housing Leadership Council: Angela Solis**
 - Network of organizers to support affordable housing
 - Advocating for and preserving affordable housing
 - Greatest need:
 - Deeply affordable homes
 - Focused on funding for affordable homes with example policies:
 - Commercial linkage fees
 - IZ, vacancy tax, sales tax, etc.
 - Seeking greater outreach from jxs for Housing Element process- window into populations
- **Faith in Action Bay Area: Trinidad Villagomez**
 - Focus in Redwood City
 - Community organizers, leaders working in congregations schools, neighborhoods and apartments across SMC to uphold dignity of all people
 - Listening to community experiences with housing (phone calls, door knocking, church involvement, people at food distribution sites)
 - What the group heard from the community:
 - Poor building conditions, harassment, discrimination, rent increases, fear to speak to authorities, difficulty relocated, evictions for renovations and owner move in, unclear how to enforce existing rental rights, pandemic insecurity, rental debt, financial hardship, credit limitations, application fees
 - From focus groups:
 - Rent increase is the majority primary issue
 - Vision:
 - Regulations on eviction due to renovations
 - Preventing harassment of tenants
 - Partnership with city to work with tenants and landlords as a mediator
 - City to inspect buildings
 - Rental assistance
 - Process relocation assistance
 - Report rent increases, eviction notices, their business license and taxes
 - Education for tenant about rights
 - Policies:
 - Stronger just cause policy (define substantial renovation) and give tenants right to return (right of first refusal)
 - Stronger relocation assistance administered by the city
 - Improvements to the building inspection process, with greater confidentiality with the tenant
 - Rental registry program by city-tenant/landlord office
 - Anti-harassment policy



- More information:
<https://www.redwoodcity.org/home/showpublisheddocument/23755/637623096709130000>
- **Greenbelt Alliance: Zoe Siegel**
 - Inclusive, climate resilient communities for all to thrive
 - Housing and climate are linked
 - Advocating for climate smart development
 - SMART: Sustainable, Mixed, Affordable, Resilient, Transit-Oriented development
 - Resilience Playbook
 - Resources for local decision-makers and community leaders with policies, model ordinances, etc.
 - Ensure fair and inclusive zoning policies that makes housing accessible to everyone
 - Prioritize BIPOC families in housing policies, outreach and practice (all stages of the practices)
 - Advance racial and social equity in process
 - Increase density within existing communities in non-high fire severity zones
 - Manage the threat of climate risk by adding green infrastructure.
 - Prepare for climate impacts, require nature-based solutions for climate resilience
- **San Mateo County Labor Council: Richard Hedges**
 - Advocate for increased outreach
 - Increases for min. wage, building of housing for all workers (safe and affordable)
 - Builders: getting the work/pay required to live in San Mateo County (can afford to rent/own home)
 - Service workers are struggling to live in SMC (especially retail pay)
 - Advocated for housing built at Bay Meadows, advocated for 10% inclusive
 - State law to allow for more density for affordable housing
 - Qualified workforce is critical
 - Removing barriers for Section 8 voucher holders
- **Peninsula for Everyone: Jordan Grimes**
 - Frustration with lack of dense infill housing in SMC
 - Member engage in local project advocacy, and planning meetings and are politically active at the local and state level
 - Huge housing shortage in the county, decades of underbuilding
 - Focus on as much being built as quickly as possible
 - 3 Ps of housing policy, preservation, production, protection (interested in rental registries, want more rent data)
 - Protection: Rent control, right to counsel with the eviction process
 - Production: eliminating harmful restriction on density, parking min, streamlining housing building process



MEETING SUMMARY

Countywide Stakeholder Listening Session #3: Builders/Developers

11/1/2021, 1-2:30 pm on Zoom

Overview

On September 27, 2021, 21 Elements hosted the third of four housing element stakeholder listening sessions with housing developers and builders, including both affordable housing developers and market-rate housing developers. Detailed information about speakers and attending jurisdictions is below.

Key themes for affordable housing development included:

- Primary constraints to affordable housing include: the limits of local funding, tax credit availability (the county's pool is small, limiting the size of a development that could get an award), appropriate sites
- Key policies and programs: sufficient and flexible local funding; either public land or land that is eligible for SB 35; streamlined process and alignment across city departments
- Local governments should be aware of state and tax credit policies/requirements; be cognizant of the cumulative impacts of multiple layers of funding requirements; be prepared for community pushback now that high-resource areas are being targeted

Key themes for market-rate housing development included:

- Primary constraints include competition for sites (with other uses) which drives up land costs; construction costs; city process and zoning; all the "easy" sites have already been developed, leaving sites with environmental or political (close to single-family homes) or other sensitivities
- Key policies and programs: Specific plans and master plans and form-based zoning have been successful; removing CEQA from the equation is helpful; seek a balance of flexibility and predictability
- Localities should exercise caution with parking and ground-floor commercial requirements
- Property tax exemption is likely best tool for encouraging moderate/middle income housing created by the market



Stakeholder Presenters & Additional Resources

Organization	Speaker Name	Contact
MidPen Housing (Affordable)	Abby Goldware Potluri	agoldware@midpen-housing.org
HIP Housing (Affordable)	Kate Comfort	KComfort@hiphousing.org
BRIDGE Housing (Affordable)	Brad Wiblin	bwiblin@bridgehousing.com
Mercy Housing (Affordable)	William Ho	who@mercyhousing.org
Habitat for Humanity— Greater SF (Affordable)	Maureen Sedonaen	MSedonaen@habitatgsf.org
Eden Housing (Affordable)	Ellen Morris	Ellen.Morris@edenhousing.org
Affirmed Housing (Affordable)	Rob Wilkins	rob@affirmedhousing.com
The Core Companies (Affordable, Market Rate)	Chris Neale	chris@thecorecompanies.com
Sand Hill Property Company (Affordable, Market Rate)	Candice Gonzalez (invited, unable to attend)	cgonzalez@shpco.com
Sares Regis (Market Rate)	Andrew Hudacek (invited, unable to attend)	ahudacek@srgnc.com
Summerhill Apartment Communities (Market Rate)	Elaine Breeze	ebreeze@shapartments.com
Greystar (Market Rate)	Jonathan Fearn	jonathan.fearn@greystar.com

Jurisdictions in attendance:

Belmont
Burlingame
Daly City
East Palo Alto
Foster City

Half Moon Bay
Menlo Park
Pacifica
Portola Valley
Redwood City

San Bruno
San Mateo (City)
San Mateo (County)
South San Francisco
Woodside



Roundtable Discussion Questions/Answers

Affordable Housing Developers

1. What do you perceive are the primary constraints on affordable housing development?
 - Local funding – esp since state housing laws have helped on the land use side
 - Having funding programs that actually match the supply side/building of the homes
 - Local Funding and Operating Subsidy
 - Current cap in the 9% tax credit round (in last several rounds, not many projects going in because not enough credits in the region) – only projects with fewer than 60 units, plus high costs
 - On preservation side – have to be agile and fast, if cities want to do this, they need to have systems to deal with tight escrow periods
 - Appropriate sites
2. Are long lead (escrow) times possible in the property market today?
 - Sellers are amenable to longer lead times than pre-covid, though Peninsula is still tight
 - What's key is having a good read on public partners' funding commitment
 - For every site where factors line up, you lose a site because other things don't line up
 - You can tie it up to close upon entitlements, but carrying cost adds up, so if public commitment can come in earlier that helps reduce cost
3. What are new policies or improved policies that you think would go farthest to making it easier to develop affordable housing?
 - Local Funding and Operating Subsidy, esp flexible funding
 - 20% setaside dedicated to homeownership programs-
 - Fee waivers
 - Streamlined project timelines on the city's side
 - Consistent, regular NOFA timelines
 - Having all departments aligned on goals
 - Not having extra requirements/costs for affordable housing developments
 - Affordable housing should not bear burden for infrastructure costs
 - Remove restrictive racial covenants
 - More policies like SB 9 and 10
 - Update zoning of sites that were zoned in the 1960s
 - Resources for site analysis, more points awarded when possible to incentivize and also help with by right potentially
4. What would you say are the 3 most important things that jurisdictions can provide in order to facilitate affordable housing development in their jurisdiction?
 - Local Funding and Operating Subsidy
 - Shift unused resources (downpayment assistance for example) to production allocation for more housing or land purchases
 - Nimble funding sources
 - Affordable homeownership
 - Land with appropriate zoning



- Public land, esp in high resource areas (<https://belonging.berkeley.edu/2021-tcac-opportunity-map>)
- Making more land available with by right zoning or SB35
- Or priority zoning for affordable – San Jose allowing affordable housing to convert industrially zoned land
- Process
 - Streamlining and alignment across city Departments
 - Dedicated planner to shepherd affordable housing projects
- I'd like to encourage jurisdictions to think outside the box and find ways to encourage partnerships between for and nonprofit developers. HIP Housing has had several great experience on projects using diverted impact fees and limited partnerships.
- 5. What should jurisdictions be aware of as they designate sites for affordable housing?
 - Think about how state funding sources/developers are looking at sites. "Vanilla" Aff family is gone unless in high resource areas so need operating subsidy. Sites need to be in amenity rich area (put site through amenity scoring lens)
 - Operating subsidies needed to support the deeper affordability that is sought today
 - Layering of requirements and compatibility of different populations
 - Think about not just # of units but also # of people being served
 - A comprehensive view of constraints, impacts of delays on developers
 - Be prepared for pushback in high resource areas
 - We need more ownership, multifamily sites should be funded and counted by # of people served, not just # of doors; make residential "only" or limit commercial so can residential compete
- 6. Most of the Cities I consult for are small and do not have the capacity or expertise to shepherd affordable projects. What can you recommend otherwise?
 - Important who the city chooses to partner with. Experienced developers can do some education on that. Hire a consultant or someone who can help to navigate the process
 - Small cities are sometimes great because they don't have as much bureaucracy and can get things done more quickly
 - Smaller cities could look to partner with Developers who build under 20 units (like Habitat and others on this call) and we welcome the opportunity to learn together. P.S. It's hard to make it work financially if there are under 6 units however:)
- 7. What is your experience with rolling NOFAs (no deadline) versus NOFAs that have a fixed deadline for responses? Are there particular advantages or disadvantages to either one of these?
 - Affordable developers rely on consistent, regular process
 - Don't create a land rush and have affordable developers bid up land
 - Like rolling deadlines, since in the preservation world, can't wait until a NOFA
 - No deadlines better align with development
 - Rolling NOFA's are good, allow for flexibility to be responsive
 - If you really need to schedule it, make sure NOFA schedules coincide with other funding sources



8. Would you have advice for jurisdictions with a lot of environmental constraints that can make housing expensive--faults, steep slopes, limited sewer, fire hazard, etc.?
 - Often they aren't as bad as you might initially think. A second look can make something workable
 - All the easy land has been developed on already! So don't hold back, this is the norm, not the exception
 - There are sometimes sources for brownfield funding
9. What is the densities that are working best for 100% affordable projects that cities should be planning for in the Housing Element process?
 - Anything over 20 du/ac but 30-50 is better, gives more flexibility
10. What site criteria make a site feasible for securing tax credits?
 - High resource area (amenity rich)
 - Site logistics (e.g. flat site, sufficient size)
 - No need to build out infrastructure
11. Do you have a "rule of thumb" for how much local subsidy you are looking for in order to make an affordable housing development "pencil"? Do you typically need to secure County funds for the project as well as city funds and/or land?
 - 100-300K per home
 - 30% local subsidy. Typically need county, city funding and land but depends on project specifics
12. Do you have any advice as jurisdictions release NOFAs/prioritize their affordable housing trust funds?
 - Put more money in production! Support ownership programs, modify program to accommodate and understand their impacts
 - Family housing that can compete (e.g. high resource area)
 - Senior housing at lower AMI's
 - Operating Subsidies that aren't a COSR (e.g. LOSP) to serve homeless/ELI
13. From your experience in responding to site-specific RFPs, what would you say makes for a good RFP that you would be super excited to respond to?
 - Large sites
 - Sites with good logistics
 - Consider RFQ's instead of RFP's

Market-Rate Housing Developers

1. What do you perceive are the primary constraints on market-rate housing development?
 - Competing with other land uses in acquisitions - life science and industrial and certain commercial driving more value
 - City constraints
 - Construction costs
 - All the easy sites are gone. Now they're politically sensitive, closer to single-family neighborhoods



2. What are new policies or improved policies that you think would go farthest to making it easier to develop infill housing?
 - Clear paths to entitlements would help
 - Specific plans and master plans are great, CEQA document, design standards
 - Other paths that remove CEQA from the equation
 - Would be a mistake to only think about high density residential, need to think about housing of all shapes and sizes (SB 9, ADUs, duplexes)
3. Which jurisdictions are doing a good job? (Answers were mostly about specific plans)
 - Redwood City
 - Milpitas
 - Santa Clara County
 - City of Santa Clara
 - Oakland – 4 specific plans
 - Burlingame’s general plan
 - Caution that specific plan does take time, often falls behind schedule
 - San Mateo County’s transit has a lot of potential
4. Conversely, what are some cities that took approaches you think didn't work out well and why?
 - A city that got very detailed in a specific plan, and it wasn’t relevant to the market, so it sat for a very long time before the city realized they needed to adjust the specific plan
5. What would you say are the 3 most important things that jurisdictions can provide to facilitate more housing development in their jurisdiction?
 - Flexibility is key, but balance with predictability and consistent standards
 - Form-based zoning allows for evolution of details – we talk in terms of density, but form-based zoning images make more sense to people
 - Resources
 - Streamlined processes
 - Restrictions on other competing uses
 - Partnerships with city departments that streamline and adhere to code standards and other standards
6. What should jurisdictions be aware of as they designate sites for multifamily housing?
 - Anticipate objections and set up ways to mitigate them
7. Is there a range of project densities or size that is your sweet spot?
 - Depends on location
 - Depends on rents
 - Summerhill - Type III over Type I garage, (5 stories wood over 2 stories concrete), 20-22 units to the acre – 3 story residential density
 - Densities are going down, because unit mix is changing, putting bigger units in them. Used to have a lot of studios and 1BRs, now making 2BRs and larger 1BRs
8. Questions on parking. Are you finding car stackers practical for your developments?
 - Yes starting to do this in the right locations (Core, Summerhill)
 - Not necessarily cheaper but allows you to use land more efficiently and not go underground



- Hard parking minimums can be problematic when it comes to site planning, so some flexibility on parking is key
 - 1:1 parking ratio works near transit
9. Does this group see a lot of potential in SB 10? -- urban infill for up to 10 unit multi-family projects -- exempt from CEQA
- Fan, there are possibilities, but we'll see how much it actually gets implemented
 - What's missing is the small scale developer (they've been zoned out), if SB 9 and 10 can spawn that ecosystem, it can make a difference. Right now the pool isn't deep enough, not enough to sustain a business. If a community wants them, they will need to cultivate these types of development and developers
10. How does developing mixed use developments affect housing? How does it affect competing land uses?
- Summerhill has mixed-use projects with ground floor commercial that is not leased
 - What makes good retail is sometimes at direct odds with what makes for good unit plans above. Depth of retail etc. It is a challenge
 - Amount of retail, needs foot traffic, really depends on location. Only so much retail to go around
11. What are ways that you think jurisdictions could facilitate the development of moderate and middle income housing?
- Projects with JPA programs
 - Property tax relief for moderate-income units
 - Once upon a time, market-rate housing delivered housing for middle income households, we just don't have a lot of housing opportunities. Restricting supply doesn't restrict demand. Allow more housing generally
 - Access to specialized loan products and property tax incentives would help with middle income housing



MEETING SUMMARY

Countywide Stakeholder Listening Session #4: Service Providers

11/15/2021, 1-2:30 pm on Zoom

Overview

On November 15, 2021, 21 Elements hosted the fourth of four housing element stakeholder listening sessions with San Mateo County service providers. Detailed information about speakers (see appendix for organizational information) and attending jurisdictions is below.

Key themes included:

- Key location characteristics were similar for most groups: access to transit, groceries, medical services, pharmacy, schools/parks/community centers/senior centers, jobs and job training.
- Most of these stakeholder groups serve people with a range of incomes – focused primarily at the low end of the income spectrum but also into moderate levels.
- Need affordable housing (or access to vouchers/subsidies that help with access to market-rate housing) of all shapes and sizes: mostly smaller units (studios to 2BR) but there is a need for larger units. It is hard for larger families (5-8 people) to find appropriately sized housing. Space, closets and storage, design for people with disabilities. *See below for details.*
- Some people need onsite supportive services; others just need to be able to easily access services, whether by transit or if it can come to them.
- Work with service providers and people experiencing issues firsthand before creating programs.
- Use your networks and power to encourage business/tech/philanthropy to support service providers

Policies & Programs to consider:

- Actively partner with affordable housing developers to streamline and facilitate development
- Stabilize market rents
- Use public land for affordable housing
- Create more workforce housing.
- Increase inclusionary housing
- Encourage and facilitate more homesharing
- Educate landlords on their rights so they are more willing to partner with Housing First service providers



Stakeholder Presenters & Additional Resources

Organization	Speaker Name	Contact
Daly City Partnership (one of San Mateo County's Core Agencies)	Marya Ouro-Gbeleou	marya@dcpartnership.org
HIP Housing	Laura Moya	lmoya@hiphousing.org
LifeMoves	Jacob Stone	jstone@lifemoves.org
Mental Health Association of San Mateo County	Melissa Platte	melissap@mhasmc.org
National Alliance on Mental Illness	Michael Lim	michael@namisanmateo.org
Ombudsman of San Mateo County	Bernadette Mellott	berniemellott@ossmc.org
Samaritan House San Mateo (one of San Mateo County's Core Agencies)	C. LaTrice Taylor	latrice@samaritanhousesanmateo.org
Youth Leadership Institute	Alheli Cuenca	acuenca@yli.org
Abode Services	Jeremiah Williams (unable to participate live, interviewed)	jwilliams@abodeservices.org
El Concilio	Gloria Flores-Garcia (unable to participate live)	gfgarcia@el-concilio.com

Roundtable Discussion Questions/Answers

1. We assume that transit-oriented or transit accessible housing is important. Are there any other location characteristics that you would highlight are important for the people you serve?
 - o Mental Health Association – access to transit, medical care, grocery stores, pharmacy
 - o Daly City Partnership – in Daly city all services are sited in the govt center by design, so housing should either be close to it or have direct transit access
 - o Youth Leadership Institute – parks within or near housing developments are important to young people, new community centers or access to existing ones, high walkability
 - o HIP Housing – agree with all mentioned, near schools for family housing, senior centers for senior housing
 - o National Alliance on Mental Illness – justice-informed community (people who have experience with law enforcement, ranging from a 5150 call or involuntary hold to being incarcerated in jail or prison system) need access to services



- Abode – varies. Have some unique programs, sometimes relocate people out of the county. Medical, schools, childcare, transportation. Access to jobs/job training
2. What is the range of income levels of the population you serve?
- Mental Health Association - 0 to 15%
 - LifeMoves – range from 0 to 100%
 - Daly City Partnership – weighted to the lower end 0 to 30, 0 to 50%, a lot at 80% too but not as many
 - National Alliance on Mental Illness – lower end, but mental illness spans people across the whole income spectrum
 - Abode – serve the lowest incomes
3. What role does market-rate housing play for the people you serve? Are vouchers helping?
- Mental Health Association – for most clients, market-rate housing is out of reach, even affordable is also often out of reach (since it serves 40% to 120% AMI)
 - Ombudsman – her clients in assisted living get a \$1500 check, rent is \$5000+, sometimes families or retirement funds make it work. Now facing a number of families who cannot help anymore because of lost jobs during the pandemic. 15 people on evictions list right now, many are 85+ years. If they are evicted they will end up on the streets. Looking for solutions for them. They don't take transportation, they can't
 - HIP Housing – 95% of clients in homesharing program are at or below 80% of AMI, sometimes not low enough to access affordable housing. And some are on fixed income and don't qualify for affordable housing and don't make enough to access homesharing program. Waiting lists are way too long
 - Daly City Partnership – see a lot of same types of people that Ombudsman sees, just a few years earlier, before they need assisted living. It's a tough spot to be aging in San Mateo County, unless you're healthy or living with your adult children. Think about dignity for our older folks. We need to care for our elders.
 - Abode – do master leases, use vouchers, so existing and new market-rate housing plays an important role. Develop relationships with landlords that accept vouchers (provide case mgt/contact for landlords, help to avoid evictions). Important to educate landlords around their rights, not a lot of legal services available to them. Work with a range of landlord and building types.
4. Do affordable units need to be designed in a certain way or certain size to meet the needs of the people you serve?
- Mental Health Association – definitely need more units that are available for people with physical disabilities. Serve people with serious mental illness, HIV/AIDS debilitating conditions, etc. It used to be that they would die far younger than most, but now people are now living into 60s-70s-80s. This is great but long-term effects of medications have impact on their bodies, put them at greater risk for falls, etc. Mostly studios and 1BRs (preferred), closets and storage in the unit are critical
 - Youth Leadership Institute – serve young people – in Half Moon Bay they are seeing 3 HH living in one unit, looking to advocate for pathway to homeownership, also single family housing (3BR/2BA). Want as much space as possible, spacious living areas.



During pandemic school from home was incredibly challenging esp when community centers weren't open or limited. Also like ADA accessible, parking spaces, access to community parks, trails, since there are not a lot of things for young people to do; storage units and closets, public bathrooms in developments

- HIP Housing – serve single individuals, families and seniors. Larger families get missed, families of 5-8 or larger can't find any affordable housing options. Some seniors would benefit from onsite services, during pandemic especially suffered from isolation
 - LifeMoves – serving more seniors every year, medically fragile folks – in terms of families serve primarily smaller households of 2-3, but do have a few large HH too
 - National Alliance on Mental Illness – agree with many things mentioned above, add better noise insulation since clients may have experienced trauma and loud levels of noise can trigger them to the next episode
 - Abode – need all types of units
5. For the population you serve, if the cities were able to encourage a set-aside within affordable housing for special needs, who needs onsite supportive services? Who can live in general affordable housing (assuming deeper levels of affordability)?
- Mental Health Association – only 30% of people we serve need to have site-based services onsite, but 100% of clients need access to support services. Deep affordability/subsidies/vouchers can work as long as there are services that can be brought in to work with them
 - National Alliance on Mental Illness – some of our clients may lose custody of their children or have shared custody. Studio will suffice for most but for some who are working to get their life back in order, helps to have a little bit more space when they have their children visit
 - Daly City Partnership – Was able to tour Sweeney Lane (MidPen Housing) in Daly City – wonderful onsite services. Was moved, this is what our people need, it's a shame that it is so small. Excellent example of good practice of surveying residents about their needs and evolved services as needed. Many clients don't need that level though. Echo importance of evolving services over time. Midway Village in Daly City – for several years there weren't onsite services, people there for generations, underserved population historically. Some of the seniors today moved there when they were young – we need to think about aging in place, be thoughtful over the long term about evolving resident needs. There is a need for large units (4 children) in the market even though the smaller households are most common. # of kids is a limiting factor on affordable applications
 - Ombudsman – there is no affordable assisted living. Pipe dream is that some people might be able to live in affordable housing with their families if they had some onsite services. Some need their medications to be given to them. Physical therapy is provided in nursing homes. Cheapest assisted living is \$4500, ranges up to \$10K/mo. Seniors need the same basic services no matter their income. Also serve mentally and physically disabled in residential homes. Nobody wants them, which is very sad.
6. Aside from more money, what can jurisdictions do to be helpful? Future programs and policies not just about the direct allocation of money



- Daly City Partnership – Sweeney Lane is an example of the city getting behind a development and working collaboratively to get everything together – zoning, permitting, convincing adjoining land owner with lot to sell the lot. Worked to move things as quickly as possible. It takes such a long time to make these projects happen, which is a problem when people are homeless *today*
 - HIP Housing – one of the things jurisdictions can do is encourage and support affordable and accessible prices in the overall housing market. More supportive services for mental health issues, esp at earlier stages. More supportive services to people on fixed income, make sure they don't lose fixed income if they get access to new resources. Jurisdictions may not recognize homesharing as a solution, but they should consider it, it is readily available, no cost, can help fill in the gaps
 - Mental Health Association – agree with everything that has been said. Use city and county owned property for low income housing. Support developers that include extremely low income units, that provide support services onsite or accessible. There's a lot of talk about teacher housing – nonprofit staff need affordable housing too. Would help to recruit and retain employees, who we are losing every day. If we can't hire staff, we will not be able to serve
 - Ombudsman – all the market-rate developers who are building these beautiful residential buildings, but only put 3 low income units in 25 unit building. We should incentivize them to add more low-income units. Give the developer a tax credit to incentivize them to increase the # of low income units. Get more people off the streets and into nice apartments.
 - National Alliance on Mental Illness – incentives to builders is great. Also think about how to halt the exchange of ownership on property. Every time land is sold and changes hands, it becomes more expensive. Think more creatively about ownership of land
 - Abode – Besides more money, we need more vouchers, more staff. More project-based housing. Education for landlords on their rights will help more landlords be willing to take vouchers, sign master leases. Rapid rehousing is needed but it doesn't work for everyone; we need more permanent supportive housing. Jurisdictions should reach out to people at ground level for input before creating programs.
7. Are there options for people that have animals?
- Mental Health Association - Most of our clients can have an animal as long as we work with them to request a reasonable accommodation. 100% of our units can and will make the accommodation.
 - National Alliance on Mental Illness – pets are huge thing for our clients, not only with soothing them but also creating a sense of responsibility, gives them second thoughts when they are thinking of ending their lives
 - HIP Housing – it is still a big barrier in affordable housing when their pet is not a service or supportive animal. Many people have more than one pet which is also a barrier.



8. How much have the large companies--Apple, Facebook, YouTube, etc--stepped up to help provide money for these services and housing units?
- Mental Health Association - To our knowledge, not much.
 - Ombudsman – got turned down for grants from FB, Google, Genentech
 - Samaritan House – they do fund some things, some of the folks here do have funding, depends on the focus, housing, food, youth has been big. Need to understand what is it that they really want to fund and tailor what you're doing to what they're asking for
 - Daly City Partnership – CZI is funding all of the Core Agencies in SMC, doing a lot of work around free, high-quality training for their grantees and others. They are at the forefront. Key to support for Core Agencies: someone at County advocated for the Core Agencies. Jurisdictions, use your network and political power to help orgs
 - HIP Housing – has benefited from CZI as well
9. Additional comments
- Samaritan House – article came out today about most expensive zip codes in the country. For the 5th year in a row: Atherton. In the Bay Area we have 47 out of 100 zip codes that are among the highest in the country. In SMC, 10 of the 47. Somehow, some way we need to figure out how to solve this with partners, with developers (who have codes to follow, does tax credit offset how much they can make, when it's more about the money and those who can afford it vs. police, firemen, nonprofit workers). We are fast approaching that cliff where we're not only pricing out our clients but also the middle class. We need to do something, not sure what it is. We've got a fire. Where are the hoses, where is the water, where are the fire trucks? Tech companies should be a part of this process. We need the people with the money at the table. The tech companies are contracting with people so they don't have to pay benefits. People are working from other parts of the state/country because their money doesn't go as far in the Bay Area. \$140K income for a family of 4 only covers the basics. I know the people who are here know that. But who else do we need at the table to know it too.
 - Daly City Partnership - One of my favorite quotes, "Tell the rich of the midnight sighing of the poor." We need to educate the upper-class and business folks - appeal to their conscience. But that is my own personal view. LaTrice (Samaritan House) is so right.
 - National Alliance on Mental Illness – Need to look at transportation, exploring localities that are hubs. In a few years (or even now) we are facing the challenges of our own existence. NAMI San Mateo had to give up its permanent site and move offsite. Current location is not ideal, not close to any public transportation system. El Camino is going to look like two walls of buildings with homes. Is that what we want or do we want to add transit to allow people access to services. Jurisdictions should start thinking about transportation hubs. Think about housing density and building up because limited land, is precious. Need to think about it now since it takes time to build infrastructure



Appendix: Additional Stakeholder Information

Human Investment Project (HIP Housing)

- Mission: HIP Housing's Mission is to invest in human potential by improving the housing and lives of people in our community. HIP Housing enables people with special needs, either from income or circumstance, to live independent, self-sufficient lives in decent, safe, low-cost homes. To achieve our mission, HIP Housing provides Home Sharing, Self-Sufficiency, and Property Development.
- Where you operate: All cities in San Mateo County
- Whom you serve: Families and Individuals who live, work, go to school or have a housing voucher in San Mateo County.

LifeMoves

- Mission: To provide interim housing and supportive services for homeless families, couples and individuals to rapidly return to stable housing and achieve long-term self-sufficiency.
- Where you operate: Countywide, Daly City to East Palo Alto and Half Moon Bay on the coast
- Whom you serve: families, couples and individuals experiencing homelessness

Mental Health Association of San Mateo County

- Mission: Mental Health Association of San Mateo County is dedicated to improving and enriching the quality of life for individuals in our community who have a mental illness, HIV or AIDS or a co-occurring disorder by providing stable housing and supportive services.
- Where you operate: San Mateo County
- Whom you serve: Individual adults, transition age youth, and families.

Samaritan House

- Mission: Fighting Poverty, Lifting Lives
- Where we operate:
 - San Mateo Office: Belmont, Burlingame, Foster City, Hillsborough, Millbrae, San Carlos, San Mateo
 - E. Palo Alto Office: E. Palo Alto, Menlo Park
- Whom we serve: residents in need, including families with children, seniors, persons living with disabilities, veterans, and unhoused individuals

Daly City Partnership

- Mission: Working together to enrich life in our community
- Where you operate: Daly City, Colma, Broadmoor residents primarily. San Mateo County residents.



- Whom you serve: Residents in need, including families with children, seniors, persons living with disabilities, veterans, and unhoused individuals and families. Services for all ages and stages.

Youth Leadership Institute

- Mission: yli builds communities where young people and their adult allies come together to create positive social change. We achieve this in two key ways: providing training, tools and resources for effective youth advocacy, and by leveraging the experience and savvy of adult allies.
- Where you operate: Half Moon Bay, Daly City, & greater San Mateo County
- Whom you serve: Low income and BIPOC youth

Ombudsman Services of San Mateo County

- Mission: The residents of Long Term care Facilities are often the most vulnerable in society. OSSMC works to ensure the protection of these residents through advocacy, direct intervention and collaboration with service providers.
- Where you operate: OSSMC provides services to all licensed LTC facilities in San Mateo County.
- Whom you serve: We service all residents in licensed LTC facilities in SMC. We presently serve 442 facilities with a total of 9278 residents

El Concilio of San Mateo County

- Mission: ECSMC is committed to increasing education, employment and access to quality of life services to underserved communities in San Mateo County
- Where you operate: County wide, East Palo Alto, Menlo Park, North Fair Oaks/Redwood City
- Whom you serve: Low Income, non/limited English speaking and non/limited literacy residents

Abode Services

- Mission: Abode Services' mission is to end homelessness by assisting low-income, un-housed people, including those with special needs, to secure stable, supportive housing; and to be advocates for the removal of the causes of homelessness.
- Where you operate: Alameda, Santa Clara, San Francisco, Santa Cruz, San Mateo, and Napa counties.
- Whom you serve: People identified as homeless or at risk of becoming homeless



April 21, 2022

Dear San Bruno City Council:

We are writing on behalf of **YIMBY Law** and **Greenbelt Alliance** regarding San Bruno's 6th Cycle Housing Element Update. **YIMBY Law** is a legal nonprofit working to make housing in California more accessible and affordable through enforcement of state law. **Greenbelt Alliance** is an environmental nonprofit working to ensure that the Bay Area's lands and communities are resilient to a changing climate.

We are writing to remind you of San Bruno's obligation to include sufficient sites in your upcoming Housing Element to accommodate your Regional Housing Needs Allocation (RHNA) of **3,165 units**.

In the Annual Progress Reports that San Bruno submitted to HCD, we observe the following trend of housing units permitted in the last four years:

Year	Housing units permitted
2018	6
2019	135
2020	48
2021	83
Average, 2018–2021	68

To meet the 6th cycle RHNA target, the rate of new housing permits in San Bruno would need to increase from **68 units per year** in 2018–2021 to **396 units per year** in the next 8 years. This is a 482% increase from recent years. **If the current pace were to continue, San Bruno would meet only 17% of its new housing target.**

Based on these trends, it is unlikely that San Bruno's existing realistic zoning capacity is sufficient to meet its 6th cycle RHNA target. According to HCD's Housing Element Site Inventory Guidebook, housing elements must analyze the realistic capacity of their sites, which may include considerations of "[l]ocal or regional track records", "past production trends", and "the rate at which similar parcels were developed during the previous planning period". A housing element that does not include a significant rezoning component is therefore unlikely to be compliant with state law.

We urge San Bruno to include a major rezoning component in its Housing Element—a rezoning large enough to close the gap between recent housing production trends and the RHNA target. The rezoning should be within existing communities and should comply with the city's obligation to Affirmatively Further Fair Housing. We also urge San Bruno to ease any other constraints, such as discretionary approval processes or impact fees, that may impede the rate of development on your city's housing sites.

Thank you,

Sid Kapur, East Bay YIMBY (sidharthkapur1@gmail.com)

Rafa Sonnenfeld, YIMBY Law (rafa@yimbylaw.org)

Zoe Siegel, Greenbelt Alliance (zsiegel@greenbelt.org)



San Francisco International Airport

May 6, 2022

TRANSMITTED VIA E-MAIL and U.S. MAIL

jgrogan@sanbruno.ca.gov

Jovan D. Grogan
City Manager
City of San Bruno
567 El Camino Real
San Bruno, California 94066-4247

RE: Redevelopment of Tanforan Shopping Center ("Reimagining Tanforan"), City of San Bruno

The San Francisco Airport (SFO or the Airport) is deeply concerned about the City of San Bruno's (the City) adoption and issuance of the Reimagining Tanforan Fact Sheet in July 2021, to develop a mixed use (retail/office/residential) development at the 44-acre Tanforan shopping center. The City identified the project as adding a minimum of 1,000 housing units, and that the City would need to plan for as many as 3,165 housing units City-wide through 2031.¹ We appreciate this opportunity to continue to coordinate with the City regarding redevelopment of the Tanforan site and to seek practical alternatives for the development of additional housing stock.

As described in the City's Fact Sheet, the site currently contains commercial tenants, a movie theater, a Bay Area Rapid Transit (BART) station, a San Bruno police station, parking garages, and a surface parking lot. In December 2020, the Association of Bay Area Governments (ABAG) issued the San Bruno Regional Housing Needs Allocation (RHNA) that called the City to add 3,165 housing units City-wide by 2031. The RHNA called for these additional units based partially on the presence of the San Bruno BART and Caltrain stations and access to the U.S. 101, I-280, and I-380 freeways. The Airport and ALUC was never consulted during the RHNA allocation process. For such matters pertaining to housing within the Community Noise Equivalent Level (CNEL) 70 decibel (dBA) noise contour, the Airport urges the City to engage the Airport, SFO Airport/Community Roundtable, Caltrans Division of Aeronautics, and the Federal Aviation Administration (FAA).

As shown on **Attachment A**, the Tanforan shopping center is located entirely within the CNEL 70 dBA noise contour and located directly beneath the extended centerline of SFO's primary departure runway path for long-haul international air carriers and cargo operators. SFO and City staff have met several times in 2022 since issuance of the RHNA to discuss both the City's and Airport's concerns. These concerns are also consistent with the City's concerns expressed in a letter sent by the City to ABAG, dated July 8, 2021, including: (a) concerns over significant aircraft noise exposure to the future residents and height restrictions over the site; and (b) the City's RHNA requirement and lack of consideration to account for existing State land use compatibility laws.

¹ City of San Bruno, Reimagining Tanforan Fact Sheet, adopted by City Council July 27, 2021. Available online: https://sanbruno.ca.gov/DocumentCenter/View/2043/San-Bruno-Land-Use-Visioning_CC-Approved-7-28-2021?bidId=

NOISE COMPATIBILITY POLICIES

The Airport supports practical housing development in the Bay Area, especially low-income and transit-oriented developments. However, commercial and industrial areas, zoned and used as such for decades in the City, are now being identified for rezoning and redevelopment to include high density housing/transit oriented development because these areas are located adjacent to high-quality transit (i.e., the San Bruno BART and Caltrain stations and the El Camino Real bus corridor) as defined by the State of California.

The Airport appreciates that much of the City is contained within the CNEL 70 dBA noise contour. The commercial and industrial land uses that make up most of the existing land uses within the CNEL 65 dBA noise contour (which is defined as the significant noise impact area under federal and state regulations) have served the Airport and the community well for decades. The intent of these federal and state regulations is to prevent any new residential developments within the significant noise contour. The proposed redevelopment of Tanforan to include incompatible housing remains a serious concern for the Airport.

The Tanforan site is inside the Airport Influence Area B as defined in the *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport* (SFO ALUCP) adopted by the City/County Association of Governments of San Mateo as the designated Airport Land Use Committee. ***All residential development related actions within the CNEL 70 dBA contour are determined to be incompatible, including rezoning of a site to residential uses, under Noise Compatibility Policy (NP-4).*** Acoustical treatments could reduce interior noise levels and could be conditionally compatible residential developments within the CNEL 65 to 70 dBA contour. However, residential developments within the CNEL 70+ dBA noise contour would allow a significant impact to future residents and is identified under federal and state regulations as incompatible with sound insulation. Interior insulation would fail to address noise in outdoor amenity spaces often provided alongside housing. Further, the simple act of opening a window would compromise the efficacy of even the best noise insulation.

SFO was the first U.S. airport with an approved noise compatibility program from the Federal Aviation Administration (FAA) in 1983. Since then, the FAA and SFO have funded, implemented, and maintained a robust sound insulation program that has allowed SFO to be one of the few public use airports in the State of California to be fully compliant under Title 21 of the California Code of Regulations. Millions of federal and local funds have been expended to achieve land use compatibility within the CNEL 65 dBA noise contour – by sound insulating homes, places of worship, and schools, to be consistent with federal and state land use compatibility regulations. To date, the FAA and SFO have expended \$33.5 million dollars sound insulating 2,664 residential properties in San Bruno. In the current Noise Insulation Program (Second Chance Initiative and repair/re-installation of insulation that has not met performance expectations), an additional 77 residential properties in the City have been identified for sound insulation with FAA and SFO investments estimated at \$8.85 million dollars. ***Redevelopment of the Tanforan site to include high density residential units would undermine decades of scientifically-informed land use planning and millions of dollars expended to safeguard public health and safety.***

The materials and technology used for sound insulation have limited warranties and eventually fail over

time. **Residential development within the CNEL 70 dBA contour would render the Tanforan development ineligible for FAA/SFO grants for future sound insulation, including the subsequent repair or re-installation of insulation materials when they fail over time.** Similarly, Public Utilities Code section 21678 precludes the City and County of San Francisco/SFO from having any liability should the City proceed with the Reimagining Tanforan project in contravention of the SFO ALUCP noise compatibility policies. There would be no viable aircraft noise abatement or noise mitigation measures that could alleviate the significant and unmitigable noise these future residents may experience, especially from long-haul international air carriers and cargo operators that depart late night/early morning; and due to the weight of the cargo, the cargo freighter aircraft typically fly slow and low to the ground. Therefore, the Airport will be unable to address noise complaints that are sure to arise from these residents and will refer them to the City of San Bruno.

Airport staff conducted a search of comparable residential density in the United States based on the same parameters as the proposed housing development at the Tanforan site, including: (1) located within 1.2 miles from an extended imaginary runway centerline serving as primary departure runway for international operations; and (2) minimum of 7,000-foot long runway that allows for international aircraft operations. As shown in **Attachment B**, Airport analysis found that **there is no other housing of comparable density in the United States. The proposed Tanforan redevelopment would result in the densest population per square mile near a major international airport.** Future residents would be located directly beneath, not one, but two primary departure runways serving international operations at SFO. The baseline noise conditions for future residents would be significant but can be avoidable if the City identifies other locations for housing outside the CNEL 70 dBA contour.

AIRSPACE COMPATIBILITY POLICIES

As shown on Exhibit IV-17 of the ALUCP (see **Attachment C**), the critical aeronautical surfaces at the Tanforan site are at an elevation between approximately 125 and 145 feet above mean sea level (AMSL), as defined from the origin of the North American Vertical Datum of 1988 (NAVD88). Given that the ground elevation at the Tanforan is site approximately between 36 and 55 feet AMSL (NAVD88), the heights of the buildings would need to be between approximately 55 and 90 feet above ground level to be compatible with the Airspace Compatibility Policies of the SFO ALUCP, subject to the issuance of a Determination of No Hazard from the FAA (see below) for any proposed structures, and determinations from the City/County Association of Governments of San Mateo County as the designated Airport Land Use Commission.

This determination would not negate the requirement for the developer to also undergo FAA review as described in Title 14 Code of Federal Regulations Part 77 for both (1) the permanent structures and (2) any temporary cranes or other equipment taller than the permanent buildings which would be required to construct those structures.

Due to the proximity of the Tanforan site to the Airport and certain procedures from the two primary departure runways (Runways 10L-28R and 10R-28L), both the permanent building heights and temporary cranes or construction equipment must be considered. **Otherwise, any penetrations of the critical aeronautical surfaces adopted in the SFO ALUCP would result in real financial and economic impacts to air carriers, cargo operators, SFO/City and County of San Francisco, and**

potentially reduce airlines' ability to transport high-value cargo (e.g., biotechnology and high-technology cargo).

Also enclosed are with Attachment C, are Airspace Protection Policies (AP-1 through AP-4) from the SFO ALUCP as a reminder of incompatible site characteristics, especially as they pertain to solar panel building materials/features that reflect and create bright lights/glare.

Lastly, SFO is providing clarification to the Caltrans Division of Aeronautics' letter sent to your attention (dated January 25, 2022). On page 2 of their letter, the image referred to as the one engine inoperative (OEI) surface is superseded by the critical aeronautical surfaces adopted in the SFO ALUCP (which also includes the composite OEI surfaces). The clarification is provided as **Attachment D**.

SAFETY COMPATIBILITY POLICIES

The land use compatibility criteria for safety zones are provided in Table IV-2 of the SFO ALUCP and included as **Attachment E**. The safety compatibility criteria are generally based on the guidelines provided in the *California Airport Land Use Planning Handbook* (Caltrans Handbook),² although modifications have been made in recognition of the intense level of existing development in the vicinity of airports. Appendix E of the Caltrans Handbook contains a discussion of the factors that were considered in establishing the safety compatibility policies. The criteria include two categories: uses that are incompatible and uses that should be avoided in the respective zones.

The Tanforan site is inside Safety Zone 4; incompatible uses within Safety Zone 4 include large child day care centers, biosafety level 3 and 4 facilities, and children's schools. Uses to be avoided, such as critical public utilities, should not be allowed in the Safety Zone unless no feasible alternative is available, as determined by the City. Where these uses are allowed, habitable structures shall be provided with at least 50 percent more exits than required by applicable codes. ***The Airport encourages the City to consider Safety Zone 4 compatibility policies during master planning and site development phases to prevent development of such incompatible uses.***

SUGGESTED ALTERNATIVE SOLUTIONS

SFO requests the City consider alternative locations to meet RHNA requirements, outside of the 70 dBA CNEL noise contour, including the Bayhill Specific Plan area and the transit oriented development corridor along El Camino Real and San Mateo Avenue located outside of the CNEL 70 dBA contour.

* * *

² Caltrans Division of Aeronautics, California Airport Land Use Planning Handbook. Available online: <https://dot.ca.gov/-/media/dot-media/programs/aeronautics/documents/californiaairportlanduseplanninghandbook-ally.pdf>

Jovan D. Grogan, San Bruno City Manager
May 6, 2022
Page 5 of 5

The Airport appreciates the City's willingness to continue to have collaborative discussions, and your consideration of these concerns. If I can be of assistance, please do not hesitate to contact Nupur Sinha, Director of Planning and Environmental Affairs at (650) 821-6678 or at nupur.sinha@flysfso.com.

Sincerely,



Ivar Satero
Airport Director

Attachments

cc: Tamara Swann, Western-Pacific Regional Administrator, Acting, FAA
Faviola Garcia, Western-Pacific Deputy Regional Administrator, Acting, FAA
Laurie Suttmeier, Manager, Western-Pacific Region, FAA San Francisco Airports District Office
Phillip Miller, Acting, Chief Division of Aeronautics, Caltrans
Airlines for America
San Francisco Airline Airport Affairs Committee
California Airports Council
United States Congresswoman Jackie Speier
San Mateo County Supervisor David Pine
San Mateo County Supervisor Dave Canepa
California State Assemblymember Kevin Mullin
California State Senator Josh Becker
Therese McMillan, Executive Director, Association of Bay Area Governments
Mark Shorett, Principal Regional Planner, Association of Bay Area Governments
Sam Hindi, Chairperson, SFO Airport/Community Roundtable
Marisa Prasse, California Department of Housing and Community Development
Hillary Prasad, California Department of Housing and Community Development
Sean Charpentier, Executive Director, City/County Association of Governments of San Mateo County
Susy Kalkin, C/CAG Airport Land Use Committee

ATTACHMENT A

City of San Bruno and SFO ALUCP Noise Compatibility Policies

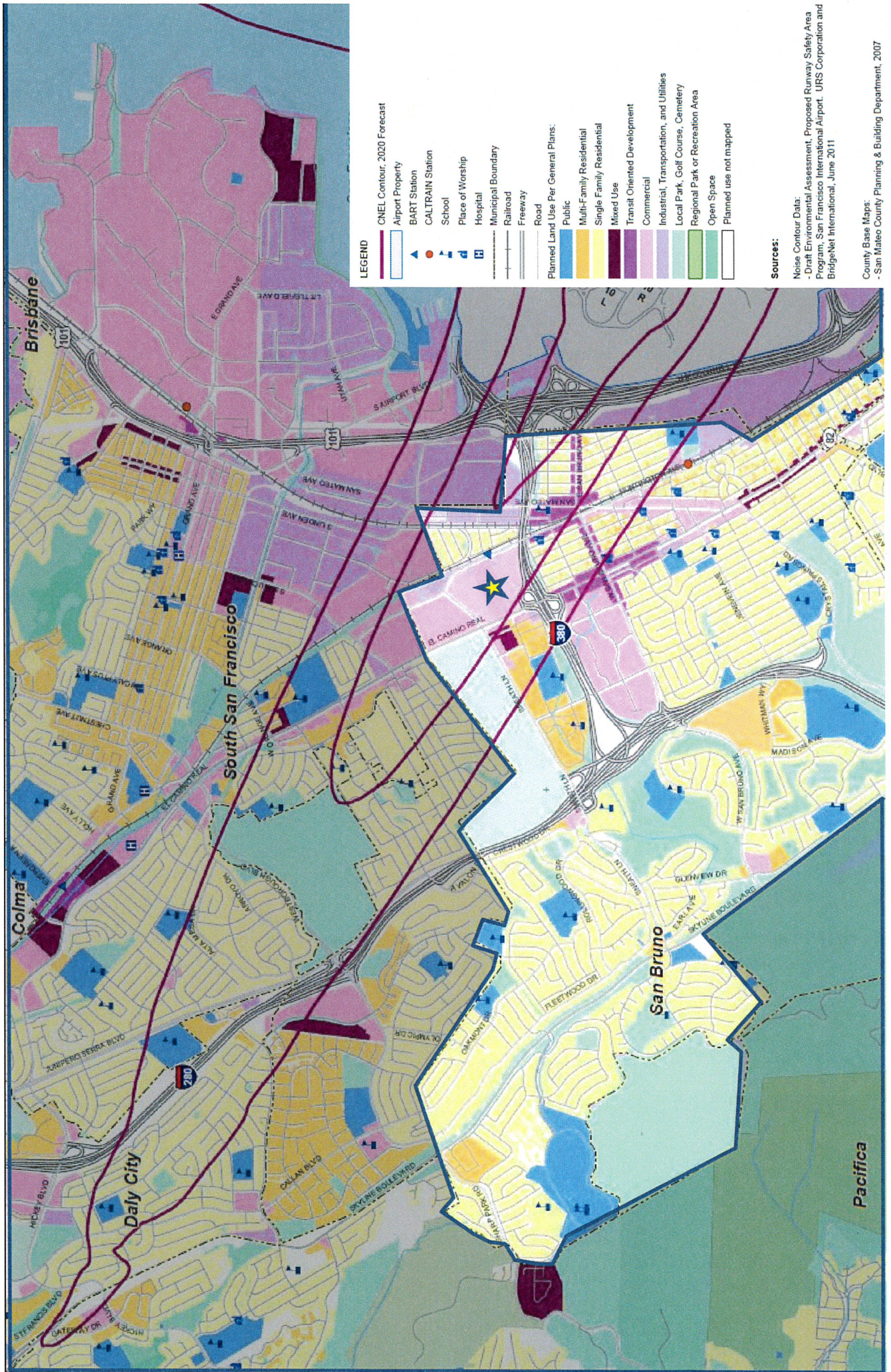


Table IV-I Noise/Land Use Compatibility Criteria

LAND USE	COMMUNITY NOISE EQUIVALENT LEVEL (CNEL)			
	BELOW 65 dB	65-70 dB	70-75 dB	75 dB AND OVER
Residential				
Residential, single family detached	Y	C	N (a)	N
Residential, multi-family and single family attached	Y	C	N (a)	N
Transient lodgings	Y	C	C	N
Public/Institutional				
Public and Private Schools	Y	C	N	N
Hospitals and nursing homes	Y	C	N	N
Places of public assembly, including places of worship	Y	C	N	N
Auditoriums, and concert halls	Y	C	C	N
Libraries	Y	C	C	N
Outdoor music shells, amphitheaters	Y	N	N	N
Recreational				
Outdoor sports arenas and spectator sports	Y	Y	Y	N
Nature exhibits and zoos	Y	Y	N	N
Amusements, parks, resorts and camps	Y	Y	Y	N
Golf courses, riding stables, and water recreation	Y	Y	Y	Y
Commercial				
Offices, business and professional, general retail	Y	Y	Y	Y
Wholesale; retail building materials, hardware, farm equipment	Y	Y	Y	Y
Industrial and Production				
Manufacturing	Y	Y	Y	Y
Utilities	Y	Y	Y	Y
Agriculture and forestry	Y	Y (b)	Y (c)	Y (c)
Mining and fishing, resource production and extraction	Y	Y	Y	Y

Notes:

CNEL = Community Noise Equivalent Level, in A-weighted decibels.

Y (Yes) = Land use and related structures compatible without restrictions.

C (conditionally compatible) = Land use and related structures are permitted, provided that sound insulation is provided to reduce interior noise levels from exterior sources to CNEL 45 dB or lower and that an avigation easement is granted to the City and County of San Francisco as operator of SFO. See Policy NP-3.

N (No) = Land use and related structures are not compatible..

(a) Use is conditionally compatible only on an existing lot of record zoned only for residential use as of the effective date of the ALUCP. Use must be sound-insulated to achieve an indoor noise level of CNEL 45 dB or less from exterior sources. The property owners shall grant an avigation easement to the City and County of San Francisco prior to issuance of a building permit for the proposed building or structure. If the proposed development is not built, then, upon notice by the local permitting authority, SFO shall record a notice of termination of the avigation easement.

(b) Residential buildings must be sound-insulated to achieve an indoor noise level of CNEL 45 dB or less from exterior sources.

(c) Accessory dwelling units are not compatible.

SOURCES: Jacobs Consultancy Team 2010. Based on State of California General Plan Guidelines for noise elements of general plans; California Code of Regulations, Title 21, Division 2.5, Chapter 6, Section 5006; and 14 CFR Part 150, Appendix A, Table I.

PREPARED BY: Ricondo & Associates, Inc., June 2012.

ATTACHMENT B

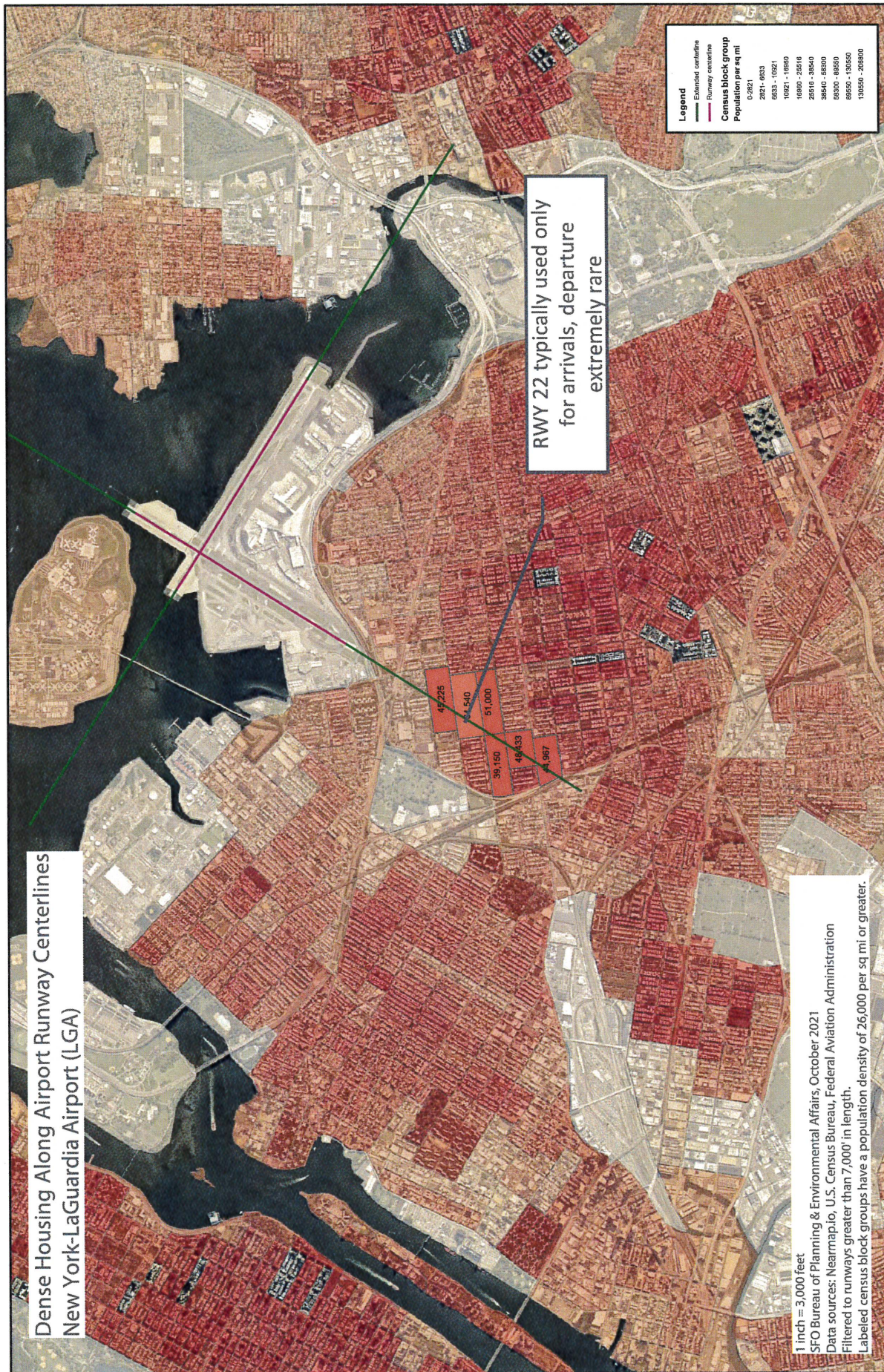
Density of Housing Along Runway Centerlines US Airports

Dense Housing Along Airport Runway Centerlines
Boston-Logan International Airport (BOS)

Single departure runway,
used about 31% of the year



1 inch = 3,000 feet
SFO Bureau of Planning & Environmental Affairs, October 2021
Data sources: Nearmap.io, U.S. Census Bureau, Federal Aviation Administration
Filtered to runways greater than 7,000' in length.
Labeled census block groups have a population density of 26,000 per sq mi or greater.



Dense Housing Along Airport Runway Centerlines SFO with Proposed Tanforan Development

1.2 miles away from two primary international departure runways

84,478.05

Legend

- Extended centerline
- Runway centerline
- Census block group
- Population per sq mi

0-500
501-1,000
1,001-1,500
1,501-2,000
2,001-2,500
2,501-3,000
3,001-3,500
3,501-4,000
4,001-4,500
4,501-5,000
5,001-5,500
5,501-6,000
6,001-6,500
6,501-7,000
7,001-7,500
7,501-8,000
8,001-8,500
8,501-9,000
9,001-9,500
9,501-10,000
10,001-10,500
10,501-11,000
11,001-11,500
11,501-12,000
12,001-12,500
12,501-13,000
13,001-13,500
13,501-14,000
14,001-14,500
14,501-15,000
15,001-15,500
15,501-16,000
16,001-16,500
16,501-17,000
17,001-17,500
17,501-18,000
18,001-18,500
18,501-19,000
19,001-19,500
19,501-20,000
20,001-20,500
20,501-21,000
21,001-21,500
21,501-22,000
22,001-22,500
22,501-23,000
23,001-23,500
23,501-24,000
24,001-24,500
24,501-25,000
25,001-25,500
25,501-26,000
26,001-26,500
26,501-27,000
27,001-27,500
27,501-28,000
28,001-28,500
28,501-29,000
29,001-29,500
29,501-30,000
30,001-30,500
30,501-31,000
31,001-31,500
31,501-32,000
32,001-32,500
32,501-33,000
33,001-33,500
33,501-34,000
34,001-34,500
34,501-35,000
35,001-35,500
35,501-36,000
36,001-36,500
36,501-37,000
37,001-37,500
37,501-38,000
38,001-38,500
38,501-39,000
39,001-39,500
39,501-40,000
40,001-40,500
40,501-41,000
41,001-41,500
41,501-42,000
42,001-42,500
42,501-43,000
43,001-43,500
43,501-44,000
44,001-44,500
44,501-45,000
45,001-45,500
45,501-46,000
46,001-46,500
46,501-47,000
47,001-47,500
47,501-48,000
48,001-48,500
48,501-49,000
49,001-49,500
49,501-50,000
50,001-50,500
50,501-51,000
51,001-51,500
51,501-52,000
52,001-52,500
52,501-53,000
53,001-53,500
53,501-54,000
54,001-54,500
54,501-55,000
55,001-55,500
55,501-56,000
56,001-56,500
56,501-57,000
57,001-57,500
57,501-58,000
58,001-58,500
58,501-59,000
59,001-59,500
59,501-60,000
60,001-60,500
60,501-61,000
61,001-61,500
61,501-62,000
62,001-62,500
62,501-63,000
63,001-63,500
63,501-64,000
64,001-64,500
64,501-65,000
65,001-65,500
65,501-66,000
66,001-66,500
66,501-67,000
67,001-67,500
67,501-68,000
68,001-68,500
68,501-69,000
69,001-69,500
69,501-70,000
70,001-70,500
70,501-71,000
71,001-71,500
71,501-72,000
72,001-72,500
72,501-73,000
73,001-73,500
73,501-74,000
74,001-74,500
74,501-75,000
75,001-75,500
75,501-76,000
76,001-76,500
76,501-77,000
77,001-77,500
77,501-78,000
78,001-78,500
78,501-79,000
79,001-79,500
79,501-80,000
80,001-80,500
80,501-81,000
81,001-81,500
81,501-82,000
82,001-82,500
82,501-83,000
83,001-83,500
83,501-84,000
84,001-84,500
84,501-85,000
85,001-85,500
85,501-86,000
86,001-86,500
86,501-87,000
87,001-87,500
87,501-88,000
88,001-88,500
88,501-89,000
89,001-89,500
89,501-90,000
90,001-90,500
90,501-91,000
91,001-91,500
91,501-92,000
92,001-92,500
92,501-93,000
93,001-93,500
93,501-94,000
94,001-94,500
94,501-95,000
95,001-95,500
95,501-96,000
96,001-96,500
96,501-97,000
97,001-97,500
97,501-98,000
98,001-98,500
98,501-99,000
99,001-99,500
99,501-100,000

1 inch = 3,000 feet
SFO Bureau of Planning & Environmental Affairs, October 2021
Data sources: Neomaps, U.S. Census Bureau, Federal Aviation Administration
Filtered to runways greater than 7,000' in length.
Labeled census block groups have a population density of 26,000 per sq mi or greater.

ATTACHMENT C

SFO ALUCP Airspace Compatibility Policies

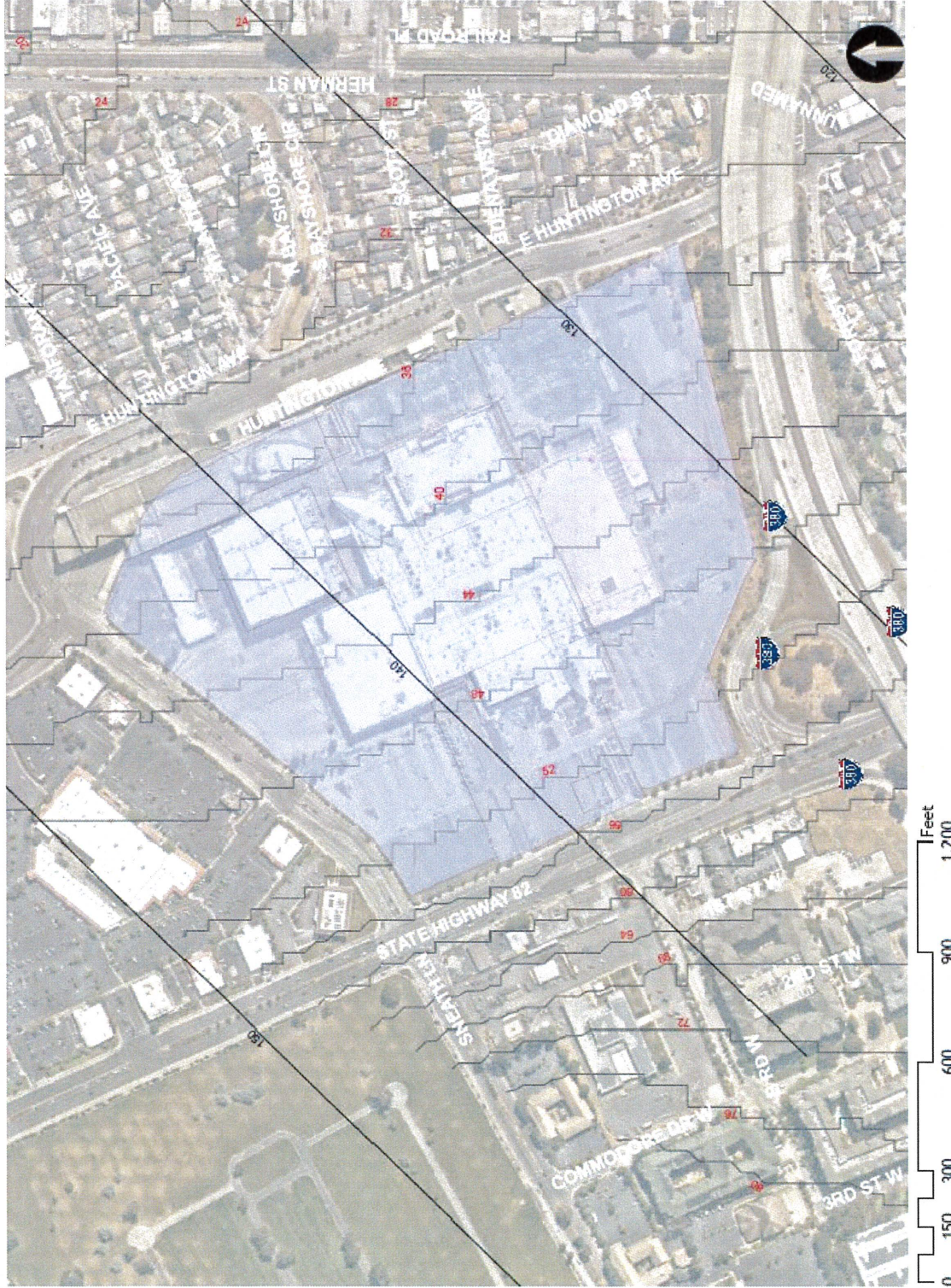
LEGEND

Critical airspace contours (ft. AMSL)

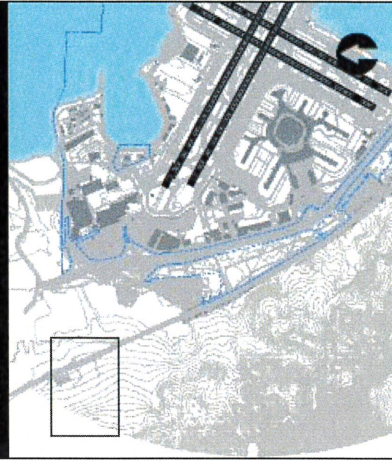
- Every 10 feet
- Every 100 feet
- Tanforan Mall p

Ground elevation (4' contours)

- Ground elevation (4' contours)

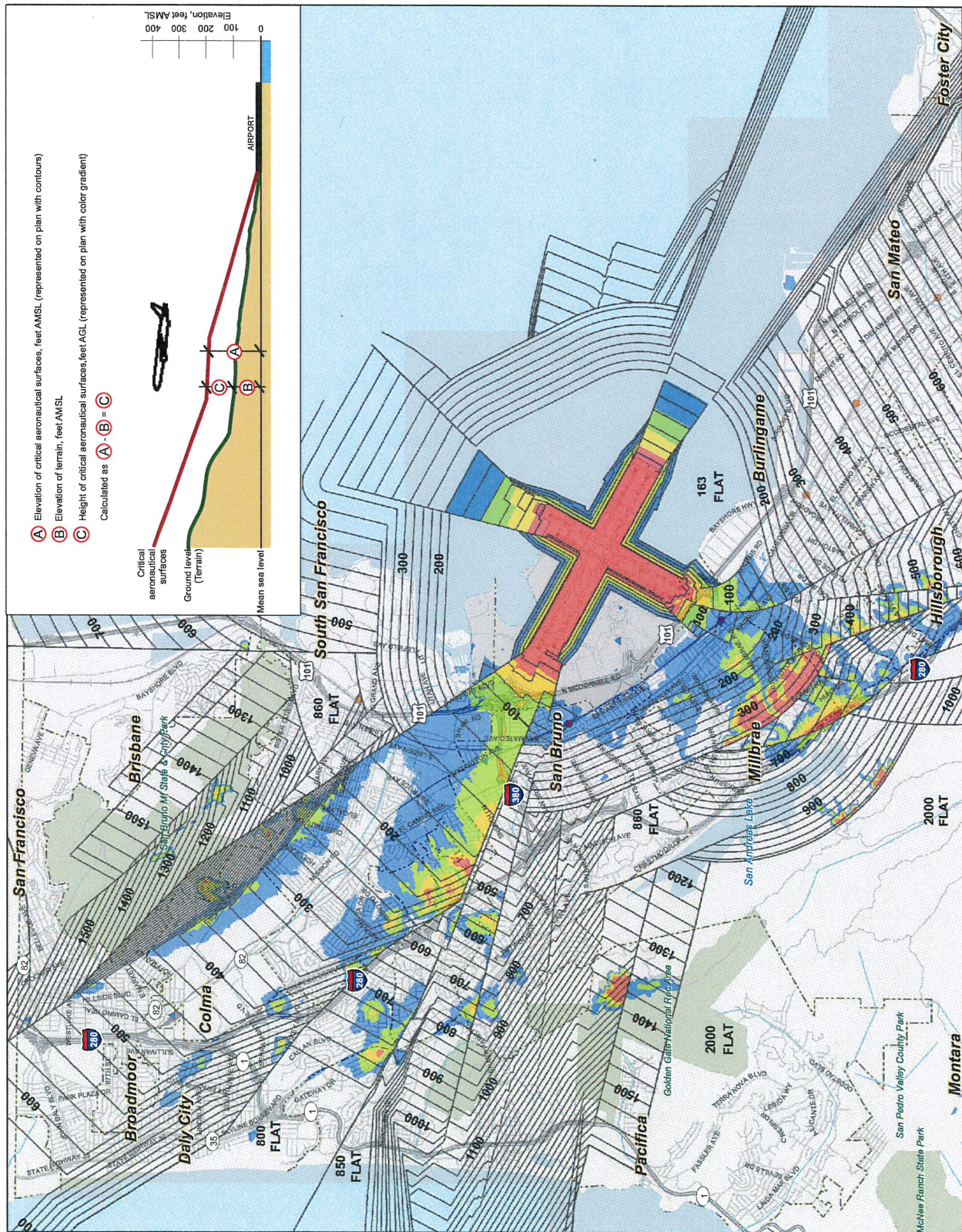


AREA OF DETAIL



Critical Airspace Contours with Ground Elevations
Airport Land Use Compatibility Analysis
San Francisco International Airport

OS



1. This map is intended for informational and conceptual planning purposes, generally representing the aeronautical surfaces considered most critical by San Francisco International Airport (SFO) and its constituent airlines. It does not represent actual survey data, nor should it be used as the sole source of information regarding compatibility with airspace clearance requirements in the development of data for an FAA Form 7460-1, Notice of Proposed Construction or Alteration. SFO does not certify its accuracy, information, or title to the properties contained in this plan. SFO does make any warrants of any kind, express or implied, in fact or by law, with respect to boundaries, easements, restrictions, claims, overlaps, or other encumbrances affecting such properties.

2. This map does not replace the FAA's obstruction evaluation / airport airspace analysis (OE/AAA) review process. Proposing construction at elevations and heights that are lower than the critical aeronautical surfaces shown on this map, (a) does not relieve the construction sponsor of this obligation to file an FAA Form 7460-1, and (b) does not ensure that the proposal will be acceptable to the FAA, SFO, air carriers, or other agencies or stakeholders. SFO, San Mateo County, and local authorities having jurisdiction reserve the right to re-assess, review, and seek modifications to projects that may be consistent with this critical aeronautical surfaces map but that through the FAA OE/AAA process are found to have unexpected impacts to the safety or efficiency of operations at SFO.

Sources: San Francisco International Airport, Jacobs Consultancy, and Planning Technology Inc., 2009

Exhibit IV-17

CRITICAL AERONAUTICAL SURFACES
-- NORTHWEST SIDE

Comprehensive Airport Land Use Plan
for the Environs of San Francisco International Airport

C/CAG

City/County Association of Governments
of San Mateo County, California

Exhibit IV-19, which is provided for information purposes only, depicts a profile view of the lowest critical airspace surfaces along the extended centerline of Runway 10L-28R – the TERPS Obstacle Departure Procedure (ODP) surface, representing standard all-engines departures, and the approximate OEI surface developed by SFO through independent study in consultation with the airlines serving SFO. The exhibit also shows the terrain elevation beneath the airspace surfaces and various aircraft approach and departure profiles, based on varying operating assumptions. The exhibit illustrates a fundamental principle related to the design of airspace protection surfaces. The surfaces are always designed below the actual aircraft flight profile which they are designed to protect, thus providing a margin of safety. Note that the ODP climb profile is above the ODP airspace surface, and the OEI climb profile is above the OEI airspace surface.

4.5.4 AIRSPACE PROTECTION POLICIES

The following airspace protection policies (AP) shall apply to the ALUCP.

AP-1 COMPLIANCE WITH 14 CFR PART 77, SUBPART B, NOTICE OF PROPOSED CONSTRUCTION OR ALTERATION

AP-1.1 Local Government Responsibility to Notify Project Sponsors

Local governments should notify sponsors of proposed projects at the earliest opportunity to file Form 7460-1, *Notice of Proposed Construction or Alteration*, with the FAA for any proposed project that would exceed the FAA notification heights, as shown approximately on Exhibit IV-10. Under Federal law, it is the responsibility of the project sponsor to comply with all notification and other requirements described in 14 CFR Part 77. This requirement applies independent of this ALUCP.

AP-1.2 FAA Aeronautical Study Findings Required Before Processing Development Application

The sponsor of a proposed project that would exceed the FAA notification heights, as shown approximately on Exhibit IV-10, shall present to the local government permitting agency with his or her application for a development permit, a copy of the findings of the FAA's aeronautical study, or evidence demonstrating that he or she is exempt from having to file an FAA Form 7460-1. It is the responsibility of the local agency to consider the FAA determination study findings as part of its review and decision on the proposed project.

AP-2 COMPLIANCE WITH FINDINGS OF FAA AERONAUTICAL STUDIES

Project sponsors shall be required to comply with the findings of FAA aeronautical studies with respect to any recommended alterations in the building design and height and any recommended marking and lighting of their structures for their proposed projects to be deemed consistent with this ALUCP.

AP-3 MAXIMUM COMPATIBLE BUILDING HEIGHT

In order to be deemed consistent with the ALUCP, the maximum height of a new building must be the lower of (1) the height shown on the SFO critical aeronautical surfaces map (Exhibits IV-17 and IV-18), or (2) the maximum height determined not to be a "hazard to air navigation" by the FAA in an aeronautical study prepared pursuant to the filing of Form 7460-1.

For the vast majority of parcels, the height limits established in local zoning ordinances are lower than the critical airspace surfaces. In those cases, the zoning district height regulations will control. Compliance with the zoning district height and the SFO critical aeronautical surfaces map, however, does not relieve the construction sponsor of the obligation to file a FAA Form 7460-1 *Notice of Proposed Construction or Alteration*, if required, and to comply with the determinations resulting from the FAA's aeronautical study.

For a project to be consistent with this ALUCP, no local agency development permits shall be issued for any proposed structure that would penetrate the aeronautical surfaces shown on Exhibits IV-17 and IV-18 or the construction of which **has not** received a Determination of No Hazard from the FAA, or which would cause the FAA to increase the minimum visibility requirements for any instrument approach or departure procedure at the Airport.

AP-4 OTHER FLIGHT HAZARDS ARE INCOMPATIBLE

Proposed land uses with characteristics that may cause visual, electronic, or wildlife hazards, particularly bird strike hazards, to aircraft taking off or landing at the Airport or in flight are incompatible in Area B of the Airport Influence Area. They may be permitted only if the uses are consistent with FAA rules and regulations. Proof of consistency with FAA rules and regulations and with any performance standards cited below must be provided to the Airport Land Use Commission (C/CAG Board) by the sponsor of the proposed land use action.

Specific characteristics that may create hazards to aircraft in flight and which are incompatible include:

- (a) Sources of glare, such as highly reflective buildings or building features, or bright lights, including search lights or laser displays, which would interfere with the vision of pilots making approaches to the Airport.
- (b) Distracting lights that that could be mistaken by pilots on approach to the Airport for airport identification lighting, runway edge lighting, runway end identification lighting, or runway approach lighting.
- (c) Sources of dust, smoke, or water vapor that may impair the vision of pilots making approaches to the Airport.
- (d) Sources of electrical interference with aircraft or air traffic control communications or navigation equipment, including radar.
- (e) Land uses that, as a regular byproduct of their operations, produce thermal plumes with the potential to rise high enough and at sufficient velocities to interfere with the control of aircraft in

flight. Upward velocities of 4.3 meters (14.1 feet) per second at altitudes above 200 feet above the ground shall be considered as potentially interfering with the control of aircraft in flight.¹⁷

(f) Any use that creates an increased attraction for wildlife, particularly large flocks of birds, that is inconsistent with FAA rules and regulations, including, but not limited to, FAA Order 5200.5A, *Waste Disposal Sites On or Near Airports*, FAA Advisory Circular 150/5200-33B, *Hazardous Wildlife Attractants On or Near Airports*, and any successor or replacement orders or advisory circulars. Exceptions to this policy are acceptable for wetlands or other environmental mitigation projects required by ordinance, statute, court order, or Record of Decision issued by a federal agency under the National Environmental Policy Act.

4.5.5 iALP AIRSPACE TOOL

In consultation with C/CAG, SFO developed the iALP Airspace Tool, a web-based, interactive tool to evaluate the relationship of proposed buildings with the Airport's critical airspace surfaces. The iALP Airspace Tool is designed to assist planners, developers, and other interested persons with the implementation of the airspace protection policies of the SFO ALUCP. The tool helps users determine: (1) the maximum allowable building height at a given site, and/or (2) whether a building penetrates a critical airspace surface, and by how much, given the proposed building height.


A more detailed description of the iALP Airspace Tool and a tutorial explaining how to use it is presented in **Appendix J**. Use of this tool, however, does not relieve a project sponsor of the duty to comply with all federal regulations, including the obligation to file Form 7460-1, Notice of Proposed Construction or Alteration, with the FAA.

¹⁷ This is a threshold established by the California Energy Commission in its review of power plant licensing applications. See *Blythe Solar Power Project: Supplemental Staff Assessment, Part 2*, CEC-700-2010-004-REVI-SUP-PT2, July 2010. California Energy Commission. Docket Number 09-AFC-6, p. 25. This criterion is based on guidance established by the Australian Government Civil Aviation Authority (Advisory Circular AC 139-05(0), June 2004). The FAA's Airport Obstructions Standards Committee (AOSC) is studying this matter but has not yet issued specific guidance.

ATTACHMENT D

Clarification to Caltrans Letter OEI Surfaces

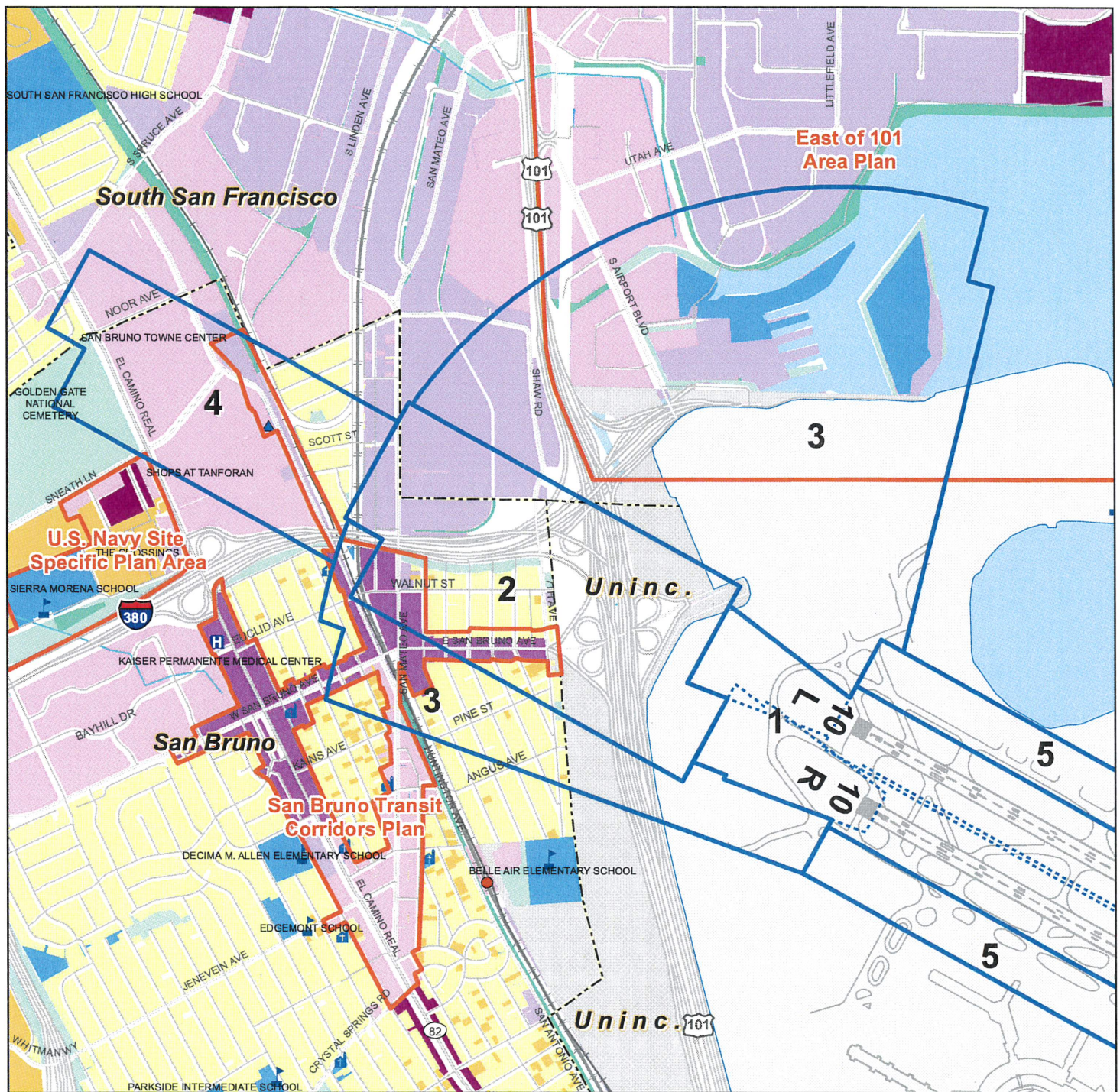
Tanforan Redevelopment
SFO One Engine Inoperative (OEI) Horizontal Extent

 The Shops at Tanforan



ATTACHMENT E

SFO ALUCP Safety Compatibility Policies



LEGEND

Safety Compatibility Zones

- 1 1 - Runway Protection Zone-Object Free Area
- 2 2 - Inner Approach/Departure Zone
- 3 3 - Inner Turning Zone
- 4 4 - Outer Approach/Departure Zone
- 5 5 - Sideline Zones
- Internal boundaries of ALP-defined areas
- Specific Plan Area
- Airport Property
- ▲ BART Station
- CALTRAIN Station
- ▤ School
- ⛪ Place of Worship
- H Hospital
- Municipal Boundary
- Railroad
- Freeway
- Major Road
- Road

Planned Land Use Per General Plans

- Public
- Multi-Family Residential
- Single Family Residential
- Mixed Use
- Transit Oriented Development
- Commercial
- Industrial, Transportation, and Utilities
- Local Park, Golf Course, Cemetery
- Regional Park or Recreation Area
- Open Space

Sources:

- Local Plans:
- San Bruno General Plan, December 2008
 - South San Francisco General Plan, 1998

Exhibit IV-8
**SAFETY COMPATIBILITY ZONES
 IN THE CITIES OF SOUTH SAN FRANCISCO
 AND SAN BRUNO**
 Comprehensive Airport Land Use Plan
 for the Environs of San Francisco International Airport

C/CAG

City/County Association of Governments
 of San Mateo County, California

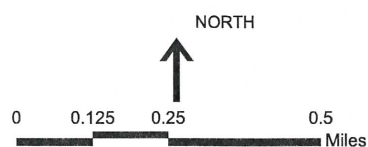


Table IV-2 (1 of 2) Safety Compatibility Criteria

ZONE	LAND USE CRITERIA	
	INCOMPATIBLE ^{1/}	AVOID ^{1/}
Zone 1: Runway Protection Zone and Object Free Area (RPZ-OFA)	All new structures ^{3/} Places of assembly not in structures Hazardous uses ^{2/} Critical public utilities ^{2/}	Nonresidential uses except very low intensity uses ^{4/} in the "controlled activity area." ^{2/}
Zone 2: Inner Approach/Departure Zone (IADZ)	Children's schools ^{2/} Large child day care centers and noncommercial employer-sponsored centers ancillary to a place of business ^{2/} Hospitals, nursing homes Hazardous uses ^{2/} Critical public utilities ^{2/} Theaters, meeting halls, places of assembly seating more than 300 people Stadiums, arenas	---
Zone 3: Inner Turning Zone (ITZ)	Biosafety Level 3 and 4 facilities ^{2/} Children's schools ^{2/} Large child day care centers ^{2/} Hospitals, nursing homes Stadiums, arenas	Hazardous uses other than Biosafety Level 3 and 4 facilities ^{2/} Critical public utilities ^{2/}
Zone 4: Outer Approach/Departure Zone (OADZ)	Biosafety Level 3 and 4 facilities ^{2/} Children's schools ^{2/} Large child day care centers ^{2/} Hospitals, nursing homes Stadiums, arenas	Hazardous uses other than Biosafety Level 3 and 4 facilities ^{2/} Critical public utilities ^{2/}
Zone 5: Sideline Zone (SZ)	Children's schools ^{2/} Large child day care facilities and noncommercial employer-sponsored centers ancillary to a place of business Hospitals, nursing homes Hazardous uses ^{2/} Critical public utilities ^{2/} Stadiums, arenas	---

Table IV-2 (2 of 2) Safety Compatibility Criteria**Notes:**

- 1/ **Avoid:** Use is not fully compatible and should not be permitted unless no feasible alternative is available. Where use is allowed, habitable structures shall be provided with at least 50 percent more exits than required by applicable codes. Where the 50-percent factor results in a fraction, the number of additional exits shall be rounded to the next highest whole number.
- Incompatible** Use is not compatible in the indicated zones and cannot be permitted.
- 2/ **Definitions**
- **Biosafety Level 3 and 4 facilities:** Medical and biological research facilities involving the storage and processing of extremely toxic or infectious agents. See Policy SP-3 for additional detail.
 - **Children's schools:** Public and private schools serving preschool through grade 12, excluding commercial services.
 - **Controlled Activity Area:** The lateral edges of the RPZ, outside the Runway Safety Area (RSA) and the extension of the RSA, which extends to the outer edge of the RPZ. See FAA Advisory Circular 150/5300-13, Airport Design, Section 212a.(1)(b).
 - **Critical public utilities:** Facilities that, if disabled by an aircraft accident, could lead to public safety or health emergencies. They include the following: electrical power generation plants, electrical substations, wastewater treatment plants, and public water treatment facilities.
 - **Hazardous uses:** Uses involving the manufacture, storage, or processing of flammable, explosive, or toxic materials that would substantially aggravate the consequences of an aircraft accident. See Policy SP-3 for additional detail.
 - **Large child day care centers:** Commercial facilities defined in accordance with Health and Safety Code, Section 1596.70, et seq., and licensed to serve 15 or more children. Family day care homes and noncommercial employer-sponsored facilities ancillary to place of business are allowed.
- 3/ Structures serving specific aeronautical functions are allowed, in compliance with applicable FAA design standards.
- 4/ Examples include parking lots and outdoor equipment storage.

SOURCE: Ricondo & Associates, Inc., June 2012.

PREPARED BY: Ricondo & Associates, Inc., June 2012.

ZONE 2 -- INNER APPROACH/DEPARTURE ZONE (IADZ)

In Zone 2, the IADZ, a variety of uses that involve hazardous materials, critical public utilities, theaters, meeting halls, places of assembly seating more than 300 people, stadiums, arenas, and those accommodating potentially vulnerable populations – such as children's schools, child day care facilities, hospitals, and nursing homes – are incompatible.

ZONE 3 -- INNER TURNING ZONE (ITZ)

The compatibility criteria in Zone 3, the ITZ, are somewhat less restrictive than in Zone 2. This is because the area is subject to less accident risk by virtue of the lower density of overflights in this area. In Zone 3, stadiums, arenas, and uses accommodating potentially vulnerable populations are incompatible. Hazardous uses and critical public utilities are not incompatible in Zone 3, but are classified as uses to be avoided. This means that they should not be permitted unless no feasible alternative is available.

ZONE 4 - OUTER APPROACH/DEPARTURE ZONE (OADZ)

The compatibility criteria in Zone 4, the OADZ, are the same as in Zone 3.



City of San Bruno
567 El Camino Real
San Bruno, CA 94066

RE: Housing Element Public Comment

To the honorable San Bruno City Council,

The Housing Leadership Council (HLC) appreciates this opportunity to comment on the city of San Bruno's housing element. HLC works with communities and their leaders to create and preserve quality affordable homes. We were founded by service providers and affordable housing professionals over 20 years ago to change the policies at the root cause of our housing shortage.

In recent years, San Bruno has implemented ambitious new policies to facilitate housing development. In particular, the San Bruno city council's leadership on Measure N in 2014—and the community's widespread embrace of the measure—creates potential for significant new housing production along the city's primary transit and commercial corridors. Ordinance 1898, passed in 2021, has significantly increased ADU production by allowing ministerial approval; the city's internal efforts to simplify the review process for ADUs further facilitate production. These policies and many others set San Bruno apart from other cities in the county, demonstrating the city's commitment to promoting housing production.

San Bruno's draft housing element continues this trend, with strong commitments to introduce important policies and programs. Nonetheless, San Bruno faces new challenges in the 6th RHNA cycle as the city plans for more than 3,000 new homes by 2031.

This letter provides proposals for changes and additions that will enable San Bruno to meet its housing obligations for all residents regardless of income. The first part of this letter examines San Bruno's needs, constraints, and AFFH analyses. The second part evaluates San Bruno's site inventory. In conclusion, we propose specific policy recommendations San Bruno can implement to increase likelihood of development on its opportunity sites, affirmatively further fair housing, and otherwise promote housing.

Needs, Constraints, and AFFH Analyses

State law requires housing elements to have several technical analyses, including an analysis of housing needs within the jurisdiction, an analysis of the governmental and nongovernmental constraints to meeting those housing needs, and an analysis of fair housing patterns in the city.

Each of these analyses must connect directly to the site inventory and the goals, policies, and programs of the housing element.

Of the three analyses, San Bruno's draft AFFH analysis is exemplary for San Mateo County. The draft housing element considers distribution of units by census tract, evaluates concentration and segregation, and proposes specific policies to further fair housing goals. These proposals are informed by a fair housing survey with diverse respondents, which garnered feedback from a significant number of renters, households with disabled residents, and single-parent households.¹

Though still stronger than most other San Mateo County jurisdictions, San Bruno's draft needs and constraints analyses would benefit from further improvements. The needs analysis in particular reads like a list of statistics, without significant effort to describe the housing needs indicated by the data. This disconnect between evidence and identified housing needs results in discrepancies between the needs analysis and the goals, policies, and programs.

For example, the city recognizes 8% of residents have a disability, and that "There is a limited supply of handicap accessible, affordable housing generally, and the supply is especially tight near transit."² Yet the city then proposes vague programs (Programs 2-F, 4-G), with quantified metrics to produce 5 units of handicap accessible housing over the next RHNA cycle—an objective that seems somewhat divorced from the identified need and the city's capacity to meet it by providing incentives for more handicap-accessible housing. (See the Goals, Policies, and Programs section of this letter for amendments and additional policy proposals.)

The needs analysis also does not connect its data to the need for very low- and extremely low-income housing, though several data points indicate such need. 63% of jobs in San Mateo pay less than \$75,000. Less than 15% of San Bruno's housing is available at rents of \$1,500 or below, compared to almost 20% in San Mateo County and 35% in the Bay Area region. Yet the city does not consider how this difference indicates a lack of housing in the San Bruno community for the highest need residents.³ One table lists households by income buckets; approximately 3,500 households make less than 50% of AMI in San Bruno, comprising more than 20% of the town's population.⁴ More than 60% of those renters are cost burdened. Explicitly recognizing the housing needs demonstrated by this data will ensure the city implements adequate policies to promote deeply affordable homes.

On the other hand, the city's constraints analysis makes a strong argument that the height limits imposed on San Bruno by Ordinance 1284 do not pose a constraint to housing because of Measure N.⁵ HLC has reviewed a number of housing elements for cities with strict height limits, none of which have taken the steps that San Bruno has to promote denser housing

¹ [Draft housing element](#), p. 133

² [Draft housing element](#), p. 86

³ [Draft housing element](#), p. 51

⁴ [Draft housing element](#), p. 58

⁵ [Draft housing element](#), p. 106

development. The city also analyzes the constraints posed by its minimum lot size requirements, and takes significant action to address them in R-2 zones (Program 2-D).

A few constraints could be further analyzed, with stronger policies implemented to address them. The city does not adequately consider the extent to which its floor-area ratio (FAR) requirements affect feasibility of housing development. In particular, FARs of 3.0 in the Central Business District, 2.0 for parcels smaller than 20,000 square feet in the TOD districts, and similarly low FARs in the Multi Use-Residential Focus zones. Several small non-vacant opportunity sites have a negligible likelihood of development without implementation of new policies that exempt them from FAR requirements.

The constraints analysis would also benefit from a more robust analysis of fees. San Bruno's fees on large multi-unit projects are above average for the county, at \$39,412 per unit.⁶ The city claims its fees are "a small portion of overall housing development costs," when, according to data provided to the city by the 21 Elements consulting team, fees make up 5% of the total cost of large multi-unit projects—a significant portion that often makes the difference between a project being financially viable or not. In its AFFH analysis, the draft housing element bizarrely classifies Housing Development Impact Fee as a policy in place that encourages housing production,⁷ when fees are by definition a disincentive on production. Alternatively, HLC proposes several fee waivers for different kinds of housing in the Goals, Policies, and Programs portion of this letter (Programs 4-G and 4-L in particular).

In some cases, the constraints analysis recognizes important barriers to housing development that then go unaddressed in the rest of the draft housing element. Most importantly, the city says that its parking requirements "could still be considered a barrier to the development of affordable housing. Recent development applications and inquiries indicate that developers prefer housing developments with fewer parking spaces than the city's revised parking requirements require."⁸ However, none of the draft housing element's policies or programs address parking minimums as a constraint on housing, especially for affordable housing or housing serving populations with special housing needs, such as disabled groups.

Fully analyzing the housing needs present in San Bruno and the governmental constraints to meeting those needs will help the city implement the necessary policies and programs to make its site inventory viable.

Site Inventory

San Bruno's Regional Housing Needs Allocation requires the city to plan for 3,165 units at the affordability levels described in the "San Bruno's RHNA Allocation" table as listed below. The site inventory requires cities to demonstrate that they have adequate locations with the necessary policies in place to produce the RHNA allocations.

⁶ [Draft housing element](#), p. 111

⁷ [Draft housing element](#), p. 127

⁸ [Draft housing element](#), p. 98

Recent changes to state law require cities to meet a higher burden of proof for affordable housing in their site inventories. In particular, sites projected for lower-income housing must meet higher standards than in prior cycles, particularly if more than 50% of sites are non-vacant—as is the case in San Bruno.⁹ HLC’s proposals in this section are intended to help the city comply with state law and create the best possible plan for new housing.

Table I: San Bruno’s Regional Housing Needs Allocation¹⁰

	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
San Bruno’s RHNA Allocation	704	405	573	1,483	3,165
San Bruno’s Site Inventory According to Draft HE	684	468	580	2,002	3,723

In order to demonstrate capacity for enough housing units, San Bruno’s housing element first demonstrates that the city has 670 units in the pipeline. HLC applauds the city’s demonstrated success promoting housing in recent years, and we believe the pipeline count to be accurate.

Next, the city assumes 345 ADUs will be built in the next eight years, a rate of just over 43 ADUs per year—nearly tripling ADU production from the past cycle, with 121 ADUs permitted from 2015-2021. In order to generate this assumption, the city notes that it updated its ADU regulations to comply with state law and streamlined the approval process in 2021, resulting in 68 building permits for ADUs in 2021. However, the city only issued 7 building permits in 2020, despite issuing 51 project approvals, meaning that a large portion of the ADU building permits issued in 2021 were a result of rollover from the prior year. Though HLC applauds San Bruno’s recent ADU production, San Bruno’s assumptions are more generous than HCD’s standard methodology for calculating ADU counts.¹¹ The city should either provide stronger justification for its assumption of 43 ADUs per year or recalculate the number using data from 2018-2021.

The rest of San Bruno’s housing element relies on projected development from opportunity sites. Though the city provides limited justification for its assumption that all sites will have a

⁹ HCD’s [Site Inventory Guidebook](#), p. 27

¹⁰ The city did not aggregate this information on its own, so I did by adding up the draft housing element’s counts for ADUs, pipeline units, and expected units from opportunity sites. In its housing element, San Bruno claims it has capacity for 3,640 dwelling units (see top of page 165 of the [Draft Housing Element](#)); this appears to be a slight miscount based on data available in San Bruno’s draft housing element.

¹¹ HCD’s [Site Inventory Guidebook](#), p. 31, “Use the trends in ADU construction since January 2018 to estimate new production.”

100% realistic capacity,¹² HLC believes adequate evidence exists for this assumption based on recent development on San Bruno's high-density corridors. We recommend the city provide more data to justify this assumption to HCD, but we support its inclusion for sites located in San Bruno's TOD-1 TOD-2, C-N, and P-D zoning districts—the majority of sites.

Though HLC supports San Bruno's use of 100% realistic capacity, the city assumes inconsistent, unreasonably high unit yields for a number of sites. In the TOD zones, assumed densities range from 76 du/ac (Site #20, 104 San Bruno Ave W) to 200 du/ac (Site #23, 401 San Mateo Ave). The city provides no justification for this massive variation in assumed density within the same zoning district.

Below, the "Small Opportunity Sites with Limiting FAR in TOD Zones" table lists four sites that are smaller than 20,000 square feet, meaning they would be limited by a FAR of 2 based on the restrictions of San Bruno's TOD zone.¹³ Yet the city inexplicably assumes these sites will be developed at densities ranging from 144 du/ac to 200 du/ac. Several sites have active businesses. Limited to a FAR of 2, with parking requirements of at least 1 car per unit, these sites have a very low likelihood of development over the next RHNA cycle. Under current city policies, they should be struck from the inventory.

Table II: Small Opportunity Sites with Limiting FAR in TOD Zones

Site Number	Site Address	Lot Size (acres)	Implicit Assumed Density (du/ac)	Projected Unit Count
15	170 San Bruno Ave W	0.29	144	42
21	104 San Bruno Ave W	0.17	147	25
22	426 El Camino Real	.30	166	50
23	401 San Mateo Ave	.20	200	40
Unit Total				157

In order to justify inclusion of these sites in the inventory, the draft housing element must:

1. Standardize assumed density for sites located within the same zoning district or demonstrate why different densities are appropriate. HLC proposes the city use the

¹² [Draft housing element](#), p. 174, "The calculations used to estimate realistic development capacity along the transit corridors assume complete redevelopment of each site primarily based on conversations with developers and based on the density of similar housing developments that were approved or proposed nearby."

¹³ The city's TOD zones limits FAR to 2 on sites smaller than 20,000 square feet.

conservative assumption of 100 du/ac in its TOD zoning districts absent substantial policy changes.

2. Remove FAR limits for all sites in TOD zones regardless of lot size and decrease parking requirements by 50% for sites smaller than 1 acre (See proposed Program 2-L). This program should have been in place anyway, since the city's constraints analysis explicitly recognizes the FAR and parking requirements as barriers to housing development.

Furthermore, some large non-vacant opportunity sites do not have adequate evidence to justify their inclusion in the site inventory. In particular, San Bruno's draft housing element relies on the Tanforan shopping center for 1,000 units of housing, which would be an excellent location for new housing if feasible. Though the shops at Tanforan are closing, the site was recently bought by a commercial real estate developer.¹⁴ Though the Tanforan sites would be an excellent location for new housing, the city does not have policies in place that make it likely to expect any housing development there. HLC would support inclusion of this site in the inventory at the assumed density if the draft housing element presented evidence that the developer had made some commitment to pursue at least 1,000 units of housing on the site; absent such evidence, housing development at this location is highly uncertain.

In order to promote development of housing at the Tanforan sites, San Bruno's city council has adopted a nonbinding Land Use Fact Sheet.¹⁵ With program 2-F of the draft housing element, the city promises to "Meet with the developer of the Tanforan site to ... emphasize the need of including a minimum of 1,000 housing units onsite." HLC believes the city must make significantly stronger commitments to incentivize housing at Tanforan in order to justify inclusion of the site in its housing element. Absent commitment to substantial policy changes—or credible evidence from the city that they have a commitment from the new Tanforan owner to build at least 1,000 units of housing—the Tanforan sites must be removed from the inventory. In the next section, we recommend policies that would validate inclusion of Tanforan as an opportunity site.

Similarly, the city has not demonstrated a high likelihood of development at other non-vacant sites, such as the Bayhill Shopping Center and 2101 Sneath Ln, a current golf driving range. The city provides no specific incentives for housing development at these sites; in fact, the city explicitly recognizes that Bayhill remains a viable shopping center. In order to ensure compliance with state law, HLC recommends the city remove these sites entirely as well, or implement specific policies as described in the following section to facilitate new development.

Table III: San Bruno's Site Inventory with Removal of Sites 3, 6, 14, 15, 21-23

Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
380	388	320	1,261	2,238

¹⁴ SF Gate, [Bay Area mall The Shops at Tanforan will be razed for a massive biotech campus](#)

¹⁵ [Reimaging Tanforan: Land Use Fact Sheet](#)

This total would be further reduced if the city accounted for several other non-vacant sites with pre-existing uses that could further impede housing development. For example, the draft housing element assumes housing will be built on school district sites, without providing any justification for inclusion of these sites in the inventory. We also do not make adjustments to the city's ADU counts or to the unexplained variation of projected density in TOD zones.

As demonstrated above, San Bruno must identify new sites or implement new strategies to create the necessary capacity for its site inventory. Fortunately, the city's goals, policies, and programs already have a number of strong policies to incentivize development, and the city can easily implement new policies that will spur housing development further on key sites.

Though our analysis may seem overly conservative, HLC believes all of the sites we have removed from the site inventory can be justified for inclusion if San Bruno implements new policies increasing the likelihood of housing development on those sites.

Goals, Policies, and Programs

In the following section, HLC describes how San Bruno can strengthen its Goals, Policies, and Programs to more effectively promote low- and very low-income housing as needed to create a viable site inventory. With its explicit action items, discrete timelines, and quantified objectives, San Bruno's draft goals, policies, and programs are significantly better than any HLC has yet seen in San Mateo County. Still, the programs in particular must be strengthened to remove constraints to housing needs and demonstrate high likelihood of development on opportunity sites.

Similarly to the site inventory, new state laws have added new requirements to the goals, policies, and programs section of a housing element. Passed in 2018, AB 1397 requires cities to directly connect policies and programs to the identified needs, governmental constraints, and site inventory, among other analyses.¹⁶ Another 2018 law, AB 686, implemented Affirmatively Furthering Fair Housing mandates, specifically requiring cities to consider how their goals, policies, and programs can better advance fair housing goals, especially the production of low- and very low-income housing. The specific programs cities implement must include "concrete steps, timelines and measurable outcomes."¹⁷

HLC recognizes that San Bruno has many goals, policies, and programs that have these characteristics. All of the programs under Goal 1, "Improve the development review and approval process to reduce processing times and simplify administration," are exemplary. Others, such as Programs 2-A and 2-B, set the city up for success in the next RHNA cycle by committing to consider ambitious new policies on a reasonable timeframe. Program 2-D, "Amend the R-2 zoning district to not allow new SFDs on vacant sites and allow two dwellings

¹⁶ See, e.g., Gov. Code, § 65583, subds. (b), (c); HCD, Building Blocks, at <https://www.hcd.ca.gov/community-development/building-blocks/index.shtml>

¹⁷ HCD's [Affirmatively Furthering Fair Housing Guidebook](#), p. 55

per lot regardless of lot size,” is the strongest program to increase missing middle density yet proposed in San Mateo County for this RHNA cycle (as of the date the city receives this letter).

However, some programs do not meet the standards of AB 1397 or AB 686, and others must be strengthened in order to justify inclusion of several significant proposed opportunity sites in the site inventory. The city must also introduce new policies to remove constraints to and implement new incentives for housing development.

Below, HLC proposes specific policies recommended by affordable housing developers and service providers to encourage affordable housing, as well as specific policy proposals to help San Bruno generate a viable site inventory.

New Policies to Promote Housing Opportunity

Proposed Policy or Program	Proposed Measure(s)	Actions and Justification
Amend Program 2-B	Put Forward a Ballot Measure to Increase Building Heights and Floor Numbers Along the El Camino Real Corridor	Unclear language like “Evaluate the possibility of putting forth a ballot initiative” (the current draft program’s text) undermines this program. Making a firmer commitment to pursue a ballot measure to increase allowable heights and floors along Camino Real may be necessary to demonstrate that the sites along Camino Real outside of the current TOD zones qualify as opportunity sites.
Amend Program 2-F	Incentivize Housing Development at Tanforan	In order to justify inclusion of the Tanforan sites in its site inventory, San Bruno must <i>either</i> present evidence demonstrating commitment from the property owner to build 1,000 homes <i>or</i> implement specific policies incentivizing housing on this site, especially affordable housing. These policies could include but are not limited to: <ul style="list-style-type: none"> - 50% parking reduction for all housing units - Impact fee waiver for very low- and extremely low-income units - City-funded subsidies for stand-alone affordable housing development built in partnership with a nonprofit developer
Amend Program 2-H	Identify Publicly Owned Sites for Affordable Housing	In addition to commissioning a study for housing development analysis on publicly owned sites, HLC recommends San Bruno also consider sites owned by religious organizations and nonprofits.

Program 2-I	Allow Pre-Approved ADU Designs with Expedited Permitting	Cities can incentivize ADU development by lowering costs. Pre-approved ADU designs have successfully spurred ADU production in a number of cities, from big cities such as San Jose to smaller ones like Encinitas .
Program 2-J	Waive Impact Fees for ADUs With Low- or Very Low-Income Deed Restrictions	Lowering costs for deed-restricted affordable ADUs in particular will incentivize production of the lower-income ADUs that San Bruno needs in order to meet the needs of all residents and create a compliant site inventory.
Program 2-K	Partner With Nonprofit Property Management to Incentivize Property Owners to Rent Their ADUs at Affordable Rates	Nonprofit property management organizations such as Hello Housing or HIP Housing can provide low-cost property management services to help households rent ADUs out at affordable rates. The city can actively partner with these providers and promote their services to encourage ADU affordability.
Program 2-L	Facilitate Housing on Small High-Density TOD Parcels	<ul style="list-style-type: none"> - Allow unlimited FAR for all parcels in TOD-1 and TOD-2 districts regardless of lot size. - Reduce parking requirements by 50% for all sites smaller than 1 acre expected in TOD-1 and TOD-2 zones. -
Program 3-C	Rental Registry	Create a rental registry listing all properties available for rent in the city, especially affordable rentals and those accessible to people with disabilities.
Program 3-D	Emergency Rental Assistance	Work with organizations to increase funding available to tenants at risk of not making rent.
Program 3-E	Improved Just Cause Eviction Ordinance	Commit to a local ordinance that protects more renters from unreasonable and unfair evictions.
Program 3-F	Relocation Benefits and First Right of	Commit to passing an ordinance that requires landlords to provide tenants with money to cover moving costs and finding a new rental when evictions are the result of not maintaining

	Return	the health and safety of the building. Require that a tenant be reserved a new unit at the prior level of affordability in the case they are displaced during redevelopment.
Amend Program 4-G	Create 25 Housing Units For Developmentally Disabled Community During Planning Period	<p>As currently written in the draft housing element, Program 4G's commitment to create 5 ADA-accessible units over the planning period does not reflect the identified need for housing for those with disabilities in the city's needs analysis. HLC proposes the city set a higher goal, and then make specific commitments to implement new policies, including but not limited to:</p> <ul style="list-style-type: none"> - Waive parking requirements for units geared toward the disabled. - Waive impact fees. - Allow extra density bonus for projects with more units accessible to disabled communities. - Provide expedited by-right approval for projects that have facilities for special needs populations.
Program 4-J	Fee Exemptions for 100% Affordable Housing Projects	According to the 21 Elements Fee Survey, San Bruno's fees for large multi-family housing projects cost an average of 5% of the total development costs. These fees can make many affordable housing projects, which rely on public subsidy, infeasible. Waiving or lowering fees for 100% affordable housing projects can promote the production of more affordable housing across a spectrum of income levels.
Program 4-K	Expand Sources of Funds for the City Affordable Housing Fund.	<p>In order to raise reliable revenue, the city would benefit from internal revenue-raising proposals, such as:</p> <ol style="list-style-type: none"> 1) Vacancy Tax - Parcel taxes in the form of a vacant property tax have been used by cities (VPT, Oakland) to fund affordable housing and homeless services; as well as to entice owners of undeveloped sites to either sell or build homes on their parcels. 2) Transfer Tax - A one-time tax payment that is levied by a government on the transfer of ownership to property (i.e. sale of a home) from one individual or entity <p>HLC recommends that the city commit to dedicating staff time and arranging a range of public meetings to discuss opportunities to raise revenue from local sources to subsidize affordable housing.</p>
4-L	Promoting very low- and extremely	<ul style="list-style-type: none"> - Allow flexible inclusionary housing ordinance, with a lower proportion of BMR units if they are more deeply affordable

	low-income housing	<ul style="list-style-type: none"> - Waive parking requirements for units geared toward the disabled. - Waive impact fees. - Allow extra density bonus for projects with more units accessible to disabled communities. - Provide expedited by-right approval for projects that have facilities for special needs populations.
4-M	Upzone	

HLC wants to be a partner to the city, sharing our collective knowledge of state law and best practices to facilitate fair housing. Please contact me or other HLC staff if you would like to talk further about how San Bruno can identify and implement policies that will best meet the community's needs.

Thank you for your consideration,



Jeremy Levine
Policy Manager, Housing Leadership Council of San Mateo County

Alex Melendrez,
Organizing Manager, Peninsula For Everyone/YIMBY Action

From: Paul J Wapensky
Sent: Tuesday, May 24, 2022 7:56 PM
To: Michael Smith
Subject: Housing Element Comments

We are increasing the Cities housing by 3600 units. Where is all the water to support these units going to come from?

Paul Wapensky

Appendix K

Complete Site Inventory

RHNA distribution of units for Density > 30										City Inclusionary Policy																					
HCD Assumption										VL	L	M	AM																		
											5%	5%	5%	85%																	
										Rental	0%	5%	10%	85%																	
										For Sale																					
										Tanforan Total																					
											222	128	181	469	1000																
										Site Name	Description	Address	APN(s)	Sq ft.	Est. Acreage	Est. number of units	Density (DUA)	Very Low	Low	Moderate	Above Moderate	Total (should match col H)	Notes (optional)	Rationale (optional)	Column1	Column2					
										Tanforan						0.0															
70dba		Seritage	Regional Shopping Center - Included in Ta	1150 El Camino Real	014-316-330	513572	11.8	100	22	22	13	18	47	100	1000 total	Tanforan Mall, developer interest															
70dba		Tanforan	Regional Shopping Center - Included in Ta	1150 El Camino Real	014-316-360	521631	12.0	250	21	56	32	45	117	250		Tanforan Mall, developer interest															
Tan = rezon		JC Penny	Regional Shopping Center - Included in Ta	1122 El Camino Real	014-316-300	680158	15.6	250	16	56	32	45	117	250		Tanforan Mall, developer interest															
		Tanforan	Regional Shopping Center - Included in Ta	1122 El Camino Real	014-316-240	667731	15.3	300	20	67	38	54	141	300		Tanforan Mall, developer interest															
		Parking Lot for Seasonal Sales	overflow mall parking lot	1292 Huntington Ave.	014-311-060	61083	1.4	100	71	22	13	18	47	100		Tanforan Mall, developer interest															
		Total				56.1		1000	18																						
		Walgreens	retail store	333 El Camino Real	020-293-030	57328	1.3	150	114	33.36	19.19	27.16	70.28	150		developer interest															
x		AT&T Building	office building	840 San Bruno Avenue	020-071-050	68446	1.6	320	204	71	41	58	150	320		Preliminary plans/site for sale															
x		Melody Toyota Showroom	vehicle sales showroom building	750 El Camino Real	020-126-200	11926	0.3	32	117	7	4	6	15	32		developer interest															
x		Melody Toyota Lot	vehicle sales lot	750 El Camino Real	020-126-050	2919	0.1	7	104	2	1	1	3	7		developer interest															
x		Melody Toyota Lot	vehicle sales lot	750 El Camino Real	020-126-140	14205	0.3	34	104	8	4	6	16	34		developer interest															
x		Car sales Lot	vacant site	529 El Camino Real	020-256-090	4596	0.1	5	47	1	1	1	2	5																	
x		Car sales Lot	vacant site	529 El Camino Real	020-256-100	3000	0.1	3	44	1	0	1	1	3																	
x		Car sales Lot	vacant site	529 El Camino Real	020-256-130	5000	0.1	6	52	1	1	1	3	6																	
x		Car sales Lot	vacant site	529 El Camino Real	020-256-140	5000	0.1	6	52	1	1	1	3	6																	
x		Car sales Lot	vacant site	529 El Camino Real	020-256-150	7500	0.2	9	52	2	1	2	4	9																	
x		Car sales Lot	vacant site	529 El Camino Real	020-256-160	2500	0.1	3	52	1	0	1	1	3																	
x		Car sales Lot	vacant site	529 El Camino Real	020-256-170	2500	0.1	3	52	1	0	1	1	3																	
x		Car sales Lot	vacant site	529 El Camino Real	020-256-180	2500	0.1	3	52	1	0	1	1	3																	
x		Car sales Lot	vacant site	529 El Camino Real	020-256-190	2500	0.1	3	52	1	0	1	1	3																	
x		Car sales Lot	vacant site	529 El Camino Real	020-256-250	1617	0.0	2	54	0	0	0	1	2																	
x		Car sales Lot	vacant site	529 El Camino Real	020-256-260	4761	0.1	5	46	1	1	1	2	5																	
x		Car sales Lot	vacant site	529 El Camino Real	020-256-270	6307	0.1	7	48	2	1	1	3	7																	
x		Car sales Lot	vacant site	529 El Camino Real	020-256-280	3234	0.1	4	54	1	1	1	2	4																	
x		Car sales Lot	vacant site	529 El Camino Real	020-256-320	6186	0.1	7	49	2	1	1	3	7																	
x		Car sales Lot	vacant site	529 El Camino Real	020-256-340	2483	0.1	3	53	1	0	1	1	3																	
x		Car sales Lot	vacant site	529 El Camino Real	020-256-350	2483	0.1	3	53	1	0	1	1	3																	
x		vacant	vacant site	170 San Bruno Ave.	020-111-160	12500	0.3	42	146	9	5	8	20	42		development application submitted															
x		former Budget Motel	vacant site	850 El Camino Real	020-116-310	27442	0.6	60	95	13	8	11	28	60																	
x		IHOP	restaurant and parking lot	590 El Camino Real	020-145-020	3332	0.1	7	92	2	1	1	3	7		vacant															
x		IHOP	restaurant and parking lot	590 El Camino Real	020-145-030	3334	0.1	7	91	2	1	1	3	7		vacant/city owned															
		IHOP	restaurant and parking lot	590 El Camino Real	020-145-010	4535	0.1	8	77	2	1	1	4	8																	
		IHOP	restaurant and parking lot	590 El Camino Real	020-145-470	11498	0.3	20	76	4	3	4	9	20																	
		vacant	vacant site	104 San Bruno Ave.	020-111-150	7525	0.2	25	145	6	3	5	12	25		density est based on adjacent site															
		Russo Dental	medical office	1101 El Camino Real	020-013-200	5214	0.1	15	125	3	2	3	7	15																	
		San Bruno Pet Hospital	veterinary office	1151 El Camino Real	020-013-100	24608	0.6	60	106	13	8	11	28	60																	
													0	0																	
		Bank of America	Bank/Parking	465 San Mateo Avenue	020-362-180	22900	0.5	45	86	10	6	8	21	45		underutilized															
		Citibank	Bank/Parking	475 San Mateo Avenue	020-361-240	31500	0.7	60	83	13	8	11	28	60		underutilized															
		Chilis	Restaurant	899 El Camino Real	020-019-080	57069	1.3	100	76	22	13	18	47	100																	
		Bedroom Express	retail store	426 El Camino Real	020-362-240	14744	0.3	50	148	11	6	9	23	50																	
		San Bruno Gas	gas station	401 San Mateo Avenue	020-362-210	10854	0.2	40	161	9	5	7	19	40																	
Below 30 DUA																															
		large site with one house (R-2)	underutilized site	117 San Juan Avenue	021-172-130	9920	0.2	2	9	0	0	0	2	2		Owner interest. Zoning allows for 2 more units															
		Vacant site	vacant site	116 San Marco Avenue	021-172-130	5350	0.1	2	16	0	0	0	2	2		Owner interest. Zoning allows for 2 units															
		Vacant site	vacant site	xxx San Marco Avenue	021-172-120	5350	0.1	2	16	0	0	0	2	2		Owner interest. Zoning allows for 2 units															
		Engvall MS	golf driving range	2101 Sneath Ln.	019-270-270	435600	10.0	58	6	0	3	6	49	58		development application submitted															
		Engvall MS	golf driving range	2101 Sneath Ln.	019-270-260	483951	11.1	60	5	0	3	6	51	60		development application submitted															
Bayhill Sites (Specific Plan)																															
		Bayhill Shopping Center	shopping center	851 Cherry Avenue	020-012-190	401192	9.2	210	23	47	27	38	98	210	BHSP	housing option per plan															
		Office Building	office building	801 - 851 Traeger Avenue	020-017-020	264360	6.1	205	34	46	26	37	96	205	BHSP	housing option per plan															
Key Single-Family Sites																															
		former Edgemont ES	school district offices	500 Acacia Ave.	020-253-050	94888	2.2	15	7	0	0.75	1.50	12.75	15		district diposition of site															
TOTAL											2708	571	335	479	1323	2709															

Appendix L

Housing Trust Fund Memo for San Bruno



Memorandum

To: City of San Bruno
From: 21 Elements, Janet Stone consultant
Date: 11/10/2021
Subject: Housing Trust Fund Memo

Table of Contents

I. Executive Summary and Action Checklist	1
II. Introduction	2
III. Purpose.....	2
IV. Options to Facilitate HTF Program/Policy Development and Ongoing Implementation.....	3
V. Deploying Housing Trust Fund Resources	7
VI. Using Public or Institutional Sites for Affordable Housing.....	14
VII. Summary of Suggested Housing Element Policies & Programs	19
VIII. List of Attachments - Included as Separate Documents.....	21

I. Executive Summary and Action Checklist

This memo was prepared by the 21 Elements team to help the City of San Bruno efficiently and effectively deploy the City's BMR In-Lieu Fee Fund and Commercial Linkage fees, collectively referred to as the City's housing trust fund (HTF). It aims to provide general guidance and options to consider. The project team has also included suggested Implementation Program language to consider for the City's upcoming Housing Element update.

Here's a quick 'checklist' for using the memo:

- (1) *Skim the memo - to get an overall picture of what's presented*
- (2) *Think about which suggested policies and programs are most relevant to your city*
- (3) *Use the suggested Housing Element policy & program language as a place to start and tailor to your own situation*
- (4) *Reach out to Janet Stone (janetstn5@gmail.com) for questions or further assistance*
- (5) *Finish drafting your Housing Trust Fund-related policies and programs for your Housing Element update*



II. Introduction

The City of San Bruno is one of several jurisdictions that submitted a response to a 21 Elements survey on **Housing Trust Funds** (HTF) sent to all jurisdictions in late August 2021. San Bruno's response indicated that staff was seeking additional guidance in deploying the City's HTF. On 10/12/21 Janet Stone, consultant with 21 Elements, held an hour-long scoping session zoom call with staff members Michael Laughlin and Michael Smith. The purpose was to review San Bruno's HTF program and identify specific areas where staff felt additional assistance was needed to better deploy the jurisdiction's housing trust funds. For San Bruno, the areas needing additional assistance included:

- **Insight** into what to spend the HTF on
- **Guidance on a policy framework** / Steps for putting together a policy framework for cities just starting out that answers key questions, such as what can the HTF funds be used for (e.g. rent subsidy, creation of affordable housing, preservation of units at risk of losing their affordable deed restrictions)
- **Dedicated staffing** / Currently there is no dedicated staffing for the HTF policy and program work – need to determine how to staff and what resources will be used to pay for this work
- **Sample language** staff can put in their Housing Element update referring to whatever actions they will be taking on deploying their HTFs

III. Purpose

This memo was developed in response to San Bruno's HTF survey and information shared during the scoping session. The project team also reviewed relevant sections of San Bruno's current Housing Element and the 2020 Housing Element Annual Progress Report (2020 APR). Also provided with this memo (and referenced within) are additional resources that may prove helpful, such as information on preservation and examples of professional services RFQs (Request for Qualifications), Housing Trust Fund NOFAs (Notice of Funding Availability), and RFQs/RFPs (Request for Qualifications/ Proposals) for site-specific affordable housing.



The purpose of this memo is to provide:

- **General guidance and options to consider** to help the City effectively deploy the Commercial impact in-lieu fees and Residential in-lieu fees that comprise the HTF
- **Suggested Implementation Program language** for San Bruno's upcoming Housing Element update
- **Ideas for initial steps** the City may wish to consider to get started

This memo is not intended to provide detailed policy analysis, site identification assistance, or funding recommendations, as these deliverables are beyond the scope of this 21 Elements Housing Trust Fund initiative.

IV. Options to Facilitate HTF Program/Policy Development and Ongoing Implementation

A. Consider using some HTF resources to support City staffing and/or outside consultants to administer and deploy HTF resources

Key Idea: Use a small portion of current HTF balance to fund staff support or a consultant to help with “start-up” tasks necessary to structure the City's HTF allocation and disbursement program.

Key Idea: Use around 1% - 2% of the HTF balance annually to fund staff support or a consultant to help with ongoing HTF administration (NOFA implementation, RFQs or RFPs, loan administration, etc.)

How to Implement

According to staff, San Bruno currently has a balance of around \$3,900,000 in its housing trust fund and is anticipating receiving in the neighborhood of \$10.7M within the next year. Currently, none of the HTF balance has been encumbered (committed) for any specific use, although staff indicated they are “in conversation” with an affordable housing developer to use the funds currently available.

The City may want to consider using a relatively small portion of its current HTF balance (e.g., up to around \$50,000, but likely far less) to contract with an experienced affordable housing consultant or consultants for assistance with “start-up” tasks necessary to structure the City's HTF allocation and disbursement program. According to the 2020 APR, the City Council in 2019



authorized funding to retain a professional consultant to administer the City's Affordable Housing Program. However, due to the pandemic, staff was unable to complete the research regarding such consultant. 21 Elements has compiled a list of some experienced affordable housing consultants working in the Bay Area who are able to provide these types of services [see attached list]. Initial tasks could include assisting with development of the HTF's funding priorities, establishing HTF loan criteria, and drafting the initial Housing Trust Fund NOFA. Ideally, these tasks could be accomplished within about 6-8 months.

This initial period of time would also provide the city with an opportunity to explore the feasibility of offering a city-owned site that could meet tax credit funding criteria, or even an underutilized portion of a site owned by another public agency or a large institution willing to consider repurposing such area. Staff indicated during the scoping session that there are a number of city-owned parking lots in the downtown area that potentially could be used for affordable housing. An experienced affordable housing consultant could also assist with this task of identifying publicly-owned sites, or portions of sites, that might be redeveloped.

After this initial start-up work, the City may want to consider using at least 1%-2% of the HTF balance annually to engage a consultant who can assist with publishing an initial (and potentially, ongoing) NOFA, evaluating NOFA responses and making awards. Following an award of HTF funds, staff may need assistance with other tasks such as loan document preparation and loan monitoring, etc. An experienced affordable housing consultant can also help prepare and implement an RFQ or RFP if one or more new public or institutional sites have been identified for affordable housing development. Using a small percentage of the HTF annually to support deployment of HTF funds seems reasonable given that the current HTF balance is around \$4 million and the staff's revenue forecast is for another approximately \$10.7M to be added in 2022.

Staff will want to consult with the appropriate city departments and officials, including the City Attorney and City Manager, about any legal considerations as well as the question of whether it may be best to add part-time/full-time staff or hire contractors to carry out the types of tasks indicated above.

Why Implement

There is ample precedent for charging a fee or using a portion of loan funds for program development and administration:



- Cities receiving CDBG and HOME funds are allowed to charge a portion of their allocated funding for administration costs – eligible tasks include developing funding priorities, issuing NOFAs, evaluation of NOFA responses, loan documentation, loan monitoring, etc.
- Jurisdictions that formerly had RDAs (Redevelopment Agencies) used a portion of their RDA funds to cover administrative expenses; successor agencies are allowed to take an administrative cost allowance
- In scoping sessions with a number of jurisdictions, staff reported feeling stretched, often beyond capacity, by additional work related to the new funding programs and/or the modification of existing Inclusionary and Commercial Linkage fee programs
- Figuring out how to use HTF resources calls for affordable housing policy and program expertise that is often beyond the capacity of many smaller jurisdictions
- *Several years ago, San Mateo County Department of Housing began using a small percentage of the Affordable Housing Trust Fund (AHF) to support HCD staffing time involved in administering the AFH*
 - The Department charges a 1.5% loan fee when a loan is committed to an affordable housing development
 - Each year, approximately \$250,000 in AHF loan fees is collected and used for administration of the AHF, including accounting and fiscal services, staff project management time, loan administration, and activities to carry out the NOFA process (e.g., developing NOFA funding guidelines, drafting the NOFA, evaluating responses including due diligence reviews, selection of awardees, etc.)
- The County’s method of applying a service fee to AHF loans is just one possible way of structuring such administration fee; there may be other equally useful approaches

Suggested HE Update Implementation Program language: *Use* a relatively small portion of the current Housing Trust Fund balance (e.g., up to around \$50,000) to contract with an experienced affordable housing consultant or consultants for assistance with “start-up” tasks necessary to structure the City’s HTF allocation and disbursement program. Such tasks will include assisting with development of the HTF’s funding priorities, establishing HTF loan criteria, and drafting the initial Housing Trust Fund NOFA.*

Suggested HE Update Implementation Program language: *Use* a small percentage of Housing Trust Funds on an annual basis to support city staffing and/or outside consultants who will administer and deploy these funds in a timely, efficient, and productive manner. Such tasks may*



include accounting and fiscal services, interfacing with housing developers, development of funding NOFAs, evaluation of proposals and selection of awardees, loan document drafting, and evaluation of public, agency and institutional properties for potential affordable housing use.

**These programs could use more conditional language, i.e., “Consider using”, if the City prefers.*

B. Consider charging a modest monitoring fee for Inclusionary Housing units

Key Idea: Charge a modest annual per-unit monitoring fee for projects with inclusionary (BMR) units. Use the fees to support annual monitoring and to create a deed restriction for each property and a legal agreement laying out all the conditions and requirements related to a project’s BMR units.

How to Implement

For the same reason that it may be appropriate to consider using a small percentage of San Bruno’s HTF to support implementation of HTF activities, the City may also want to consider charging a modest annual per-unit monitoring fee for approved projects that create inclusionary (BMR) units. The project team noted in the 2020 APR that staff annually monitors the 325 affordable deed-restricted units at the Crossing. However, there was no indication that BMR units are monitored for compliance. The per-unit fee can be set at a level that does not impact the market rate project’s operational budget to any significant degree. A monitoring fees program can also be used to support the proper documentation, through a deed restriction and well-designed BMR agreement between the owner and the City, of all of the conditions and requirements related to the BMR units. Such BMR agreements then become the basis for the monitoring activities with which the owner has agreed to cooperate.

Why Implement

- Without appropriate BMR agreements and monitoring of compliance with BMR rent/sale and income restrictions, many affordable units – both homeownership and rental – will inevitably be lost over time
- Units may revert to market-rate housing due to lack of awareness on the part of owners or residents, negligence, or intentional noncompliance
- Simple ongoing monitoring efforts costing a relatively modest per-unit amount can go a long way to ensure that such loss of valuable community assets, worth many millions of dollars to replace, does not happen



Suggested HE Update Implementation Program language: *Consider charging a modest per-unit monitoring fee for approved projects creating inclusionary units in order to support ongoing monitoring of the BMR units according to the project's BMR agreement.*

V. Deploying Housing Trust Fund Resources

A. Identify the City's funding priorities for allocating HTF resources

Key Idea: Identify funding priorities for the HTF.

How to Implement

As mentioned earlier, an important initial step is to identify funding priorities for the HTF. The City Council will most likely look to the City's Housing / Community Development staff to make recommendations for the Council's or HTF oversight board's consideration. The following types of funding priorities have been identified by a number of jurisdictions in the bay area and will be further discussed below:

- Creation of new affordable housing units, serving a range of household incomes and a diverse set of populations (including supportive housing), with an emphasis on Very Low- and Extremely-Low Income units -- income ranges that are currently underserved
- Preservation of deed-restricted affordable housing
- Preservation of "naturally-occurring" affordable housing
- Rental assistance for lower-income households
- First-time Home Buyer assistance for income-qualifying homebuyers
- Assistance with rehabilitation and repair for income-qualifying homeowners
- Support for programs providing shelter, transitional housing, supportive housing, etc.

Note: not all potential funding priorities may apply to San Bruno: for example, as discussed below, it appears the City does not have any existing deed-restricted affordable housing properties that are "at-risk" of conversion to market rate due to expiring use restrictions.



Why Implement

- Before RDAs were dissolved, there were funding guidelines for “set-aside” funds for affordable housing; HOME funds also have explicit funding guidelines
- Newer sources of affordable housing funds, such as BMR in-lieu fees and Commercial linkage fees, generally have been adopted with little guidance about specific affordable housing purposes for which they may be used
- Before issuing NOFAs or allocating HTF resources, it would be prudent for cities to identify funding priorities for these funds – which may, of course, change over time

Examples of Affordable Housing funding Priorities:

Funding Priority Example: Production of New Affordable Housing Units

Typically, jurisdictions in San Mateo County place a high priority on the creation of new affordable housing units that serve a range of needs. Some jurisdictions, including the County, place a very high priority for their HTFs on the development of affordable housing units serving Very Low-Income (VLI) and Extremely Low-Income (ELI) households, while still allowing projects receiving HTFs to target a certain portion of the units as “workforce” or Low-Income units serving households up to 80% of Area Median Income (AMI), currently the upper allowable AMI for tax-credit projects. We noted in the City’s 2020 APR that no ELI or VLI units have been built to date in the current Housing Element period, although 26 VLI units were approved in August 2020 as part of the Mills Park Center mixed-use project.

Because nearly all new affordable housing developments are funded with tax credits, and a growing number are funded with State HCD program funds as well, it would be prudent to refer to tax credit guidelines and State HCD program guidelines when developing the City’s guidelines for new affordable housing developments. Aligning guidelines with existing State and Federal programs will ensure that the projects your city encourages are feasible.

The City may decide to encourage some affordable developments, or at least a portion of the units in a development, to address particular housing-related needs identified in San Bruno’s Housing Element, such as low-income large households, low-income seniors, and low-income persons with disabilities (who may require supportive housing services). *One factor to keep in mind is that some areas within San Bruno have been designated “High Resource” areas under current tax credit regulations, which means that “large-family” new construction tax credit*



projects in these areas would be very competitive under the 9% tax credit program. Projects winning 9% tax credits receive a much greater amount of funding than those receiving funding under the 4% program, which translates to more capital available for the project and the ability to more deeply target units to serve Extremely Low- and Very Low-Income households.

The specific location and size of a potential affordable housing site will also influence the type of housing (e.g., senior, family, supportive housing) that is most appropriate to build on that site, although many potential populations can often be accommodated on well-located sites near transportation and services. A growing trend is to serve more than one population within an affordable housing development, while ensuring that the specific combination of resident populations is carefully planned and there are adequate services provided for the residents. In certain cases, the City may also wish to encourage affordable housing developments to provide neighborhood-serving amenities or a mix of uses where such mixed-use development is both feasible and appropriate.

In addition to the location and populations served by an affordable housing development, it is important to carefully consider the selection of the developer partner. The guiding consideration for jurisdictions when selecting which affordable housing developers to work with should be choosing those that meet the highest standards: i.e., they are large, mission-driven affordable housing developers; they will work with the City to expertly address identified affordable housing needs; they will work diligently to secure additional types of subsidy to supplement local funding and tax-credit financing, helping them achieve deeper-income targeting for ELI and special needs populations; and they also have the experience and commitment to provide (and have consistently provided) high quality, well designed, cost effective and expertly managed developments that continue to meet residents' needs over the long-term.

Funding Priority Example: Preservation of Deed-Restricted Affordable Housing

Another important priority for a jurisdiction may be the preservation of deed-restricted affordable housing. Some jurisdictions have existing deed-restricted affordable housing projects at "high" or "very high" risk of being lost to the affordable housing stock in the near future because of expiring use restrictions and owners who are contemplating or intending to sell. We consulted with California Housing Partnership Corp (CHPC) to find out whether San Bruno has any affordable projects at "high" or "very high" risk of conversion to market-rate over the next



10 years. *It appears San Bruno does not have such at-risk developments with use restrictions expiring over the next decade. CHPC has also shared this information with city staff.*

Funding Priority Example: Preservation of “Naturally Occurring” Affordable Housing (NOAH)

Another preservation funding priority the City may wish to consider is the preservation of so-called “naturally occurring” affordable housing (NOAH), which means existing rental housing that is not rent-restricted but is serving lower-income households at affordable rents.

CHPC recently released several publications on local preservation strategies, including a 2-page brief for local governments [see attached CHPC policy brief on “Best Practices in Local Government Preservation Strategies”]. One strategy presented is the preservation of NOAH in areas that have recently gentrified, are near high quality transit and are in higher opportunity areas. CHPC suggests that jurisdictions can consider using a portion of their housing trust funds for preservation of this type of affordable housing.

There is limited experience to date with the preservation of NOAH in San Mateo County. The County Department of Housing assisted several such projects in the last few years, funding a portion of the acquisition cost and rehab work for several smaller apartment properties scattered throughout the county and a 55-unit apartment complex in Redwood City occupied primarily by persons receiving supportive housing assistance. These apartment complexes now have deed restrictions that will keep them affordable over time.

The County has found these type of preservation projects to be extremely costly, requiring a high level of local subsidies. Each project also required a hefty commitment of developer time and staffing. Smaller apartment complexes may be too small to receive acquisition/rehabilitation tax credits, and larger ones may not have the degree of rehabilitation needed to secure such tax credits. Perhaps the biggest barrier to using tax credits is a LIHTC provision referred to as the “10 year hold” rule, which dramatically limits when tax credits can be used for these types of acquisitions, thus leaving local jurisdictions entirely on their own in financing the acquisition beyond a (likely very small) bank loan. In contrast to this poor leveraging, new construction can utilize tax credits, tax exempt bonds, and a range of other state and federal that only have new construction as eligible projects types.

Another issue for these types of projects is the possibility of abuse by less-than-scrupulous actors. This may happen when a city with limited staff capacity fails to carry out the required



due diligence necessary to evaluate the long-term health of the asset or the acquisition terms. The County's Department of Housing has become aware of situations in which parties have acquired NOAH buildings with city support and then either flipped them to REITs or convinced a legitimate nonprofit to acquire the building afterward, while also taking some cash out of the sale. Some have told the city the building is in good shape when in reality it is not, leaving the city on the hook to put in additional money some years down the road when the new owner comes back looking for assistance. At that point a city may have little recourse since the project is already deed-restricted and occupied with residents who need the affordable housing. We are providing this "heads-up" in order to help cities avoid these types of potential problems. If San Bruno is considering undertaking a NOAH project, we encourage staff to consult a technical expert such as California Housing Partnership Corporation (CHPC) or similar firm with extensive affordable housing financial expertise.

While the County Department of Housing has not ruled out assisting such acquisition of NOAH in the future, any such projects will need to be carefully considered and meet reasonable funding criteria.

Funding Priority Example: Rental Assistance for Lower-Income Households

At the present time, Covid-related rental assistance is still available to landlords and eligible residents in San Mateo County. This assistance is provided through the California State Rent Relief Program / Housing is Key. When this assistance is no longer available, jurisdictions may wish to consider providing some amount of programmatic support for existing nonprofits that help lower-income residents with emergency housing assistance.

Funding Priority Example: First-Time Home Buyer Assistance for Income-Qualifying Homebuyers

A jurisdiction may wish to provide assistance to help families with different incomes and housing needs become homeowners. For example, the City of San Mateo sponsors a variety of loan programs to help households purchase condominiums and townhouses within San Mateo City limits. Applicants who live or work in the City of San Mateo receive priority over those who do not. The Housing Endowment and Regional Trust (HEART) of San Mateo County also offers down-payment assistance loans for first-time home buyers in the county.

Funding Priority Example: Assistance with Rehabilitation and Repair for Income-Qualifying Homeowners

Program 1-D of San Bruno's current Housing Element calls for "exploring opportunities to create a city-sponsored program to assist homeowners with rehabilitation and preventative



maintenance, including potential funding from the City’s BMR Housing In-Lieu Fund.” Should San Bruno decide to use HTF resources for this type of program, it could limit the program to lower-income homeowners to be consistent with the purposes of the HTF sources of funding.

Funding Priority Example: Support for Programs Providing Shelter, Transitional Housing, Supportive Housing, etc.

Currently a number of jurisdictions provide city funding to support nonprofits providing shelter, transitional housing, supportive housing, and shared housing. The city could consider using some HTF resources to support these types of programs on an annual basis.

Suggested HE Update Implementation Program language: *The City will identify funding priorities for affordable housing projects and programs funded by the City’s Housing Trust Fund.*

B. Developing “Notices of Funding Availability” (NOFA)

Key Idea: Use a NOFA process to deploy funds for affordable housing production, rehabilitation, and preservation. NOFAs can be “rolling” with no fixed deadline for responses or they can have a fixed deadline for submittals.

Key Idea: If using the HTF to assist with housing-related services, consider also using a competitive process to award these funds.

How to Implement

Housing Trust funds for affordable housing production, rehabilitation and preservation are best deployed through a competitive process, using NOFAs. A jurisdiction may also decide to use some of its HTF to assist with the provision of housing-related services for low-income populations. If this is the case, the jurisdiction may want to use a competitive process to award these funds as well, by including the services-related funds in the larger HTF NOFA or using a separate competitive funding process.

Compatibility of HTF Funding Criteria with Other Funding Sources

The vast majority of subsidized affordable housing that has been developed in San Mateo County has received part of its funding from the County. Therefore, in addition to aligning the City’s HTF funding criteria with tax credit and state funding criteria, an equally important factor contributing to the successful development of affordable housing will be the consistency or compatibility of the City’s HTF funding criteria for affordable housing production and



preservation with those of the County's Department of Housing, maximizing the ability of an affordable housing developer to secure tax credits, a city's local funding, and funding from the County.

NOFAs with Submittal Deadlines vs "Rolling" NOFAs

There are several considerations when deciding whether to issue NOFAs with submittal deadlines versus those that are "rolling" or open-ended. For large jurisdictions with very large pots of money that could support several funding awards, there likely would be a high degree of interest from affordable housing developers. A fixed deadline for submission allows multiple proposals targeting different sites to compete for the available funding. Proposals can then be compared and evaluated against the NOFA criteria, with several superior proposals typically selected for funding. However, there can be some significant drawbacks to fixed-deadline NOFAs, particularly when issued by a single jurisdiction (as opposed to the Countywide AHF NOFA).

When faced with a fixed-deadline NOFA, affordable developers looking for sites have to scramble to identify interested sellers, potentially bidding up the price for the few city-identified priority sites that are also available and developable. Additionally, some jurisdictions are only gradually accumulating HTF money and it could take several years to accumulate enough funds to support more than one project. Given these considerations, it may be more advantageous to issue a rolling NOFA – using objective criteria to award some or all of the available funds. Rolling NOFAs encourage affordable housing developers to explore site acquisition opportunities and consult with city staff about potential development concepts for a site or sites. When an interested and qualified developer has satisfied all the funding criteria and has achieved site control, a funding commitment can go to Council for approval. This process provides greater certainty for the developer; further, affordable housing developers will see that the City is interested in creating a "pipeline" for considering new proposals and using their HTF resources as these accumulate.

Site-specific developer RFQs or RFPs for public land, on the other hand, almost always use a fixed-deadline competitive process in order to generate multiple responses that can be compared and evaluated at the same time.



Timing of NOFA / RFP

Another item to consider is the timing for a HTF NOFA and/or any site-specific RFQ/RFP. Should San Bruno decide to use a fixed-submittal-date NOFA or RFQ/RFP process, it ideally should be completed at least a month or two prior to the issuance of the County's AHF annual NOFA funding cycle. That way, an affordable housing developer who has secured a San Bruno commitment (even a preliminary commitment) of funding and/or site control will have a much greater likelihood of competing successfully to secure additional funding needed for the project from the County AHF trust funds. This type of "piggybacking" of local subsidy commitments will also positively impact the developer's timetable for securing all the needed sources of the project's financing, facilitating a shorter time period between when local subsidies have been secured and the start of construction.

Why Implement

- Local HTFs accumulate funds over time and cities allocate these for public purposes
- Jurisdictions must be transparent about the use of such funds and keep the public informed about policies, allocation rounds and funding decisions
- Affordable housing developers also benefit from understanding the City's funding priorities and policies

Suggested HE Update Implementation Program language: *The City will issue an initial Housing Trust Fund "Notice of Funding Availability" (NOFA) for affordable housing production, rehabilitation, and/or preservation when the HTF has built up a balance of between \$2- \$3 million, unless the City identifies a priority that requires a larger balance. The City will also consider using a portion of the HTF, through a competitive process, to support housing-related programs and services provided by nonprofit organizations.*

VI. Using Public or Institutional Sites for Affordable Housing

In addition to providing financial resources through the HTF, jurisdictions can identify publicly-owned or other institutional sites that might be made available for affordable housing.

A. Consider contributing city-owned land

Key Idea: Identify and facilitate affordable housing development on city-owned land.



How to Implement

In December 2020 San Bruno identified a city-owned property, Admiral Court, as a locally-owned surplus site and is trying to facilitate housing development there (at this time, the project team is not aware of the status of this initiative). The city has also implemented, or is in the process of implementing, various Housing Element programs designed to encourage and incentivize affordable housing development in the TCP area, El Camino Real corridor, and downtown. These are all very positive steps that will facilitate the provision of affordable housing over time.

Jurisdictions typically solicit developer interest in building affordable housing on city-owned land through issuing either a Request for Qualifications or site-specific Request for Proposals [see attached examples of Developer RFQs and Developer RFPs]. Following selection of a single developer or development team, a site is typically conveyed either through the transfer of ownership to the developer (or an affiliated entity) for a nominal amount, or through means of a long-term ground lease. If a site is to be ground-leased rather than having ownership transferred to the developer, it would be reasonable (and the developers would expect) to negotiate a ground lease requiring an initial lump-sum payment or regular ground lease payments.

Building on efforts to date, the City could continue to work on the following:

- Identifying additional city-owned land having the potential for affordable housing development and located in Priority Development Areas, other areas zoned for mixed-use, and other appropriate areas
- Applying various policies and regulatory incentives to the development of these sites (e.g. fee waivers, reduced parking requirements, increased height limits, flexible setback requirements, etc.) to allow for the densities and other development conditions necessary to make affordable housing development feasible
- Considering using outside consultants with expertise in Low-Income Housing tax credits and affordable housing production to help evaluate potential sites for feasibility of securing tax credits, state affordable housing program funds, and other types of financing
- If a city-owned site is approved for affordable housing development, preparing an RFQ to solicit qualified developers or an RFP to solicit conceptual development proposals



Why Implement

- Given the high cost of developing affordable housing in the Bay Area, affordable housing developers look to local jurisdictions to provide a significant amount of subsidy – in the form of land contribution, housing trust funds or other local funds, fee waivers/reductions, parking requirement reductions, etc. – that make projects “pencil”
- Local subsidy is needed because non-local financing sources such as tax credits, state funding, and a commercial mortgage typically do not cover all of the development costs
- According to data from the County’s Dept of Housing, city and county support – in the form of land contribution and financial subsidies – typically provides anywhere from 10% - 30% of the cost of an affordable development
- Often there are few available sites, or available at a price that is feasible for an affordable housing development, in areas most advantageous for affordable housing development
- Developers of affordable housing will be highly incentivized to deploy their limited staffing resources to develop affordable housing in jurisdictions where low- or zero-cost land is ready to be contributed for affordable housing production -- particularly if the available land is already zoned for higher-density residential development and the City has adopted other measures such as fee waivers, reduced parking requirements, density bonuses, etc. to incentivize affordable housing development and make it more financially feasible to build
- Making additional subsidies available to such developments with deeper income targeting (ELI and VLI) and/or supportive-housing, will be an additional incentive for developers of affordable housing

Suggested HE Update Implementation Program language: *To expand the stock of affordable housing, the City will continue to identify and evaluate city-owned land that could be developed with affordable housing. Should an appropriate site or sites be identified and selected for disposition, the City will apply regulatory and zoning incentives necessary to make affordable housing development feasible on the site(s) and will issue at least one RFQ/RFP to solicit qualified affordable housing developers within ____ years of adoption of the Housing Element.*

B. Explore potential affordable housing opportunities with public agencies, health care institutions, and school districts

Key Idea: Approach public agencies, health care institutions, and school districts to assess interest in creating affordable housing on some of their underutilized or vacant properties or portions of sites; if there is interest, use zoning and regulatory incentives to facilitate such affordable housing development.



How to Implement

According to the 2020 APR, the city is working with private developers to develop housing at the former Crestmoor High School and Engvall School sites, two former surplus school sites. The project team is unaware of the nature of the housing contemplated for these surplus sites (e.g. whether it would be 100% affordable). In addition to sites that have been declared surplus, there may be cases where a property – or portion of a property – is owned by a public agency, institution, school district, or other semi-public organization and is underutilized or currently vacant but has not been formally declared surplus. In such cases, it would be worthwhile to approach these property owners to assess interest in further exploring affordable housing development opportunities.

Why Implement

- Agencies and institutions are increasingly aware that lack of affordable housing negatively impacts their workforces and threatens the overall economy
- Some are re-examining their own properties for affordable housing possibilities
- Recent examples in San Mateo County indicate interest in these types of initiatives:
 - A 122-unit workforce housing complex currently under construction on the Jefferson Union High School District's property in Daly City, which will serve the School District
 - A supportive housing development serving homeless and at-risk Veterans completed in 2015 on an underutilized area of the Menlo VA campus in Menlo Park

Suggested HE Update Implementation Program language: *To expand the stock of affordable housing, the City will work with public agencies, health care institutions and school districts to help identify potential sites or portions of sites that could be developed with affordable housing. If there is interest from an owner entity in potentially developing affordable housing on a site or sites, the City will apply various regulatory and zoning incentives necessary to make affordable housing development feasible on such sites.*

C. Explore potential affordable housing opportunities with faith-based institutions

Key Idea: Do preliminary outreach to faith-based congregations to assess interest in exploring the idea of developing affordable housing on a portion



How to Implement

A number of jurisdictions have begun to explore other innovative opportunities for developing affordable housing. One promising avenue has involved faith-based institutions. San Bruno could consider doing some preliminary outreach to faith-based congregations to assess interest in exploring potential creation of affordable housing on a portion of their property. Should any religious organizations express initial interest, the City could host a meeting and invite several affordable housing developers to be available to answer questions. The City could also provide a list of experienced affordable housing developers and encourage any interested faith-based institution to reach out for more information and assistance.

Why Implement

Faith-based organizations may be interested in developing affordable housing because:

- Their values are often aligned with the idea of facilitating affordable housing
- They may have excess or underutilized land that potentially could be developed into affordable housing
- They may have declining revenues and are looking for a one-time payment or revenue stream to help support ongoing operational expenses

Below are two recent examples of projects under development on a portion of properties owned by faith-based organizations:

Jordan Court, now nearing completion, is located on the All Souls Episcopal Parish property in Berkeley. It will provide 34 affordable studio apartments for low-income seniors with incomes between 20% and 60% AMI; 12 of the apartments will be set aside through support from the state's No Place Like Home program for formerly homeless seniors with serious mental illness. It will include new administrative offices for the clergy, as well as two residences for church staff. The \$25 million project, the first affordable housing project in north Berkeley in 30 years, is being developed by SAHA and received funding from six different sources including the City of Berkeley, Alameda County, Housing Trust of Silicon Valley, Federal Home Loan Bank's Affordable Housing Program, the state's HCD, Low-Income Housing tax credits, and a bank mortgage.



Immanuel-Sobrato Community in San Jose just had its groundbreaking in September of 2021. It will provide 108 permanent supportive affordable apartment homes for chronically homeless residents (the church requested a 100% supportive housing project). This is San Jose's first redevelopment of a place of worship to include supportive housing. The project is a unique private-public partnership between the City of San Jose, MidPen Housing, John Sobrato, the Housing Authority, and the Immanuel Evangelical Lutheran Church of San Jose. Eleven sources of financing were used. The development is near VTA transit, stores, healthcare and San Jose City College and will include a four-story building with 106 studios and 2 onsite manager units. Amenities include a secured lobby, dog run, 36 parking spaces, large common space, bicycle storage, community room with kitchen, courtyard with outdoor seating, exercise area, computer lab and laundry room. MidPen Housing is paying the church a lump-sum ground lease payment, which will significantly help the congregation financially.

Suggested HE Update Implementation Program language: *The City will engage in outreach to faith-based congregations to assess interest in exploring the concept of using a portion of their properties to develop affordable housing and facilitate a discussion between any interested parties and local affordable housing providers.*

VII. Summary of Suggested Housing Element Policies & Programs

For ease of reference, all of the suggested Housing Element policies and programs in the memo are listed below:

Policy: Consider using some of the HTF resources to support City staffing and/or outside consultants to administer the HTF and deploy HTF resources

Suggested HE Update Implementation Program language: *Use* a relatively small portion of the current Housing Trust Fund balance (e.g., up to about \$50,000) to contract with an experienced affordable housing consultant or consultants for assistance with “start-up” tasks necessary to structure the City’s HTF allocation and disbursement program. Such tasks will include assisting with development of the HTF’s funding priorities, establishing HTF loan criteria, and drafting the initial Housing Trust Fund NOFA.*

Suggested HE Update Implementation Program language: *Use* a small percentage of Housing Trust Funds on an annual basis to support city staffing and/or outside consultants who will administer and deploy these funds in a timely, efficient, and productive manner. Such tasks may include accounting and fiscal services, interfacing with housing developers, development of*



funding NOFAs, evaluation of proposals and selection of awardees, loan document drafting, and evaluation of public, agency and institutional properties for potential affordable housing use.

**These programs could use more conditional language, i.e., “Consider using”, if the City prefers.*

Policy: Consider charging a modest monitoring fee for Inclusionary Housing units

Suggested HE Update Implementation Program language: *Consider charging a modest per-unit monitoring fee for approved projects creating inclusionary units in order to support ongoing monitoring of the BMR units according to the project’s BMR agreement.*

Policy: Identify the City’s funding priorities for allocating HTF resources

Suggested HE Update Implementation Program language: *The City will identify funding priorities for affordable housing projects and programs funded by the City’s Housing Trust Fund.*

Policy: Develop a “Notice of Funding Availability” (NOFA)

Suggested HE Update Implementation Program language: *The City will issue an initial Housing Trust Fund “Notice of Funding Availability” (NOFA) for affordable housing production, rehabilitation, and/or preservation when the HTF has built up a balance of between \$2- \$3 million, unless the City identifies a priority that requires a larger balance. The City will also consider using a portion of the HTF, through a competitive process, to support housing-related programs and services provided by nonprofit organizations.*

Policy: Consider contributing City-owned land

Suggested HE Update Implementation Program language: *To expand the stock of affordable housing, the City will continue to identify and evaluate city-owned land that could be developed with affordable housing. Should an appropriate site or sites be identified and selected for disposition, the City will apply regulatory and zoning incentives necessary to make affordable housing development feasible on the site(s) and will issue at least one RFQ or RFP to solicit qualified affordable housing developers within ____ years of adoption of the Housing Element.*

Policy: Explore potential affordable housing opportunities with public agencies, health care institutions, and school districts

Suggested HE Update Implementation Program language: *To expand the stock of affordable housing, the City will work with public agencies, health care institutions and school districts to help identify potential sites or portions of sites that could be developed with affordable housing. If there is interest from an owner entity in potentially developing affordable housing on a site or*



sites, the City will apply various regulatory and zoning incentives necessary to make affordable housing development feasible on such sites.

Policy: Consider potential affordable housing opportunities with faith-based institutions

Suggested HE Update Implementation Program language: *The City will engage in outreach to faith-based congregations to assess interest in exploring the concept of using a portion of their properties to develop affordable housing and facilitate a discussion between any interested parties and local affordable housing providers.*

VIII. List of Attachments - Included as Separate Documents

RFQ examples

- RFQ – Affordable Housing Financial Consultant (County Dept of Housing, 2021)
- RFQ – Affordable Housing Financial Consultant – Q&A (County Dept of Housing, 2021)
- RFQ – Affordable Housing/Homeless Services Consultants (County of Alameda, 2020)
- RFQ – Qualified Development Partners for Project Homekey (County Dept of Housing, 2021)
- RFQ – Qualified Developers for Multiple Development Opportunity Sites (Daly City, 2017)
- RFQ – Qualified Developers – Bay Meadows Site (City of San Mateo, 2016)

RFP examples

- RFP – Developer - Middlefield Junction – Parcel A (County Dept of Housing, 2018)
- RFP – Developer - Midway/Bayshore Redevelopment Project (County Dept of Housing, 2017)
- RFP – Developer – Bradford Affordable Housing (Redwood City, 2015)

Other resources

- County Department of Housing Loan Policies – June 2020
- CHPC – *Best Practices in Local Government Preservation Strategies* (2019)
- Jordan Court Affordable Housing (Faith-Based) – Berkeley (2020)
- Immanuel-Sobrato Affordable Housing (Faith-Based) – San Jose (2021)
- *(Partial) List of Affordable Housing consultants who provide assistance to Local Governments*

Appendix M

Policies Applicable to the Development of Sites in the Inventory

The proposed 2023-2031 Housing Element will replace the existing 2015-2023 Housing Element and serve as the City of San Bruno's guiding policy document for meeting the City's future housing needs at all economic levels. As a policy document, the Housing Element does not result in direct physical changes to the environment but would indirectly lead to physical environmental changes by enabling the development of approximately 3,618 additional housing units within the City's jurisdiction. To reduce all potentially significant effects of developing the properties in the site inventory to a less than significant level, the City of San Bruno hereby adopts the following policies which are applicable to sites in the inventory listed in Chapter 6.

- 1) Future development at all Housing Opportunity Sites shall implement the following measures during demolition and construction:
 - a) Use Tier 4 engines for all off-road equipment greater than 50 horsepower (hp) and operating for more than 20 total hours over the entire duration of construction activities.
 - b) Use diesel trucks with 2010 or later compliant model year engines during construction.
 - c) Use renewable diesel during construction.
 - d) Use low-VOC coatings during construction.
 - e) Implement BAAQMD best management practices and if necessary, enhanced measures recommended by BAAQMD.
 - f) Use portable electrical equipment where commercially available and practicable to complete construction. Construction contractors shall utilize electrical grid power instead of diesel generators when (1) grid power is available at the construction site; (2) when construction of temporary power lines are not necessary in order to provide power to portions of the site distant from existing utility lines; (3) when use of portable extension lines is practicable given construction safety and operational limitations; and (4) when use of electrical grid power does not compromise construction schedules.
- 2) Future development at all Housing Opportunity Sites shall conduct a construction and operational health risk assessment (HRA) prior to the issuance of discretionary permits that would allow demolition or construction activities to take place (whichever occurs first). If the HRA demonstrates, to the satisfaction of the City, that the health risk exposures for adjacent receptors will be less than BAAQMD project-level thresholds, then additional mitigation would be unnecessary. However, if the HRA demonstrates that health risks would exceed BAAQMD project level thresholds, additional feasible on- and off-site mitigation shall be analyzed to further reduce risks to the greatest extent practicable.
- 3) Future development at Housing Opportunity Sites shall comply with the following measures:
 - a) Demolition and nesting substrate (e.g., trees, bushes, grasses, and other vegetation) removal activities shall be scheduled to avoid nesting season (February 1 to August 31). To the extent feasible, construction activities shall be scheduled to occur during the non-nesting season (September 1 through January 31).
 - b) Prior to issuance of any discretionary permits that would allow construction activities during the nesting season, a qualified biologist shall complete pre-construction surveys for active nests within 14 days of work commencing. The survey area must include the proposed development area and all areas within 300 feet of the development area boundary ("zone of influence"). If active nest, roost, or burrow sites are identified within the zone of

influence, a no-disturbance buffer shall be established for all active nest sites prior to commencement of any proposed construction-related activities to avoid disturbances to migratory bird nesting activities. A no-disturbance buffer constitutes a zone in which construction activities cannot occur. The sizes of the buffers shall be determined by a qualified biologist based on the species, activities proposed near the nest, and topographic and other visual barriers. Buffers shall remain in place until the young have departed the area or fledged and/or the nest is inactive, as determined by the qualified biologist.

- c) If work is necessary within a buffer zone of an active bird nest, work may occur under the supervision of a qualified avian biologist. The qualified avian biologist monitoring the construction work shall have the authority to stop work and adjust buffers if any disturbance to nesting activity is observed.
- 4) Future development at Housing Opportunity Site 14 shall comply with the following measures:
- a) Removal or alteration of the commemorative features of California Historic Landmark #934 shall be prohibited, and must be incorporated into any future development proposals for Site 14.
 - b) As part of the future project-level CEQA analysis of any discretionary permit that would allow the demolition of the existing buildings located at Site 14, a Historic Resource Evaluation (HRE) shall be prepared by a qualified architect or architectural historian approved by the City and meeting the Secretary of the Interior's Professional Qualifications Standards published in the Code of Federal Regulations (36 CFR part 61). The HRE shall evaluate whether any of the existing buildings meet the definition of a historic resource pursuant to CEQA Guidelines Section 15064.5. If the existing buildings do not meet the definition of a historic resource, demolition may proceed. If the HRE finds that any of the existing buildings at Site 14 meet the definition of a historic resource, demolition of buildings eligible for listing as a historic resource shall be prohibited.
 - c) In the event that any buildings meeting the definition of a historic resource pursuant to CEQA Guidelines Section 15064.5 are identified, future development proposals for Site 14 shall be reviewed for compliance by a qualified architect or architectural historian approved by the City and meeting the Secretary of the Interior's Professional Qualifications Standards published in the Code of Federal Regulations (36 CFR part 61) with one or both of the following standards prior to issuance of any discretionary permits that would allow modifications to the existing buildings or new construction on Site 14:
 - Secretary of Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings; or
 - Secretary of Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer.
- 5) Future development at Housing Opportunity Sites 6, 8, 10, 16, 18, and 19 shall comply with the following measures:
- a) If evidence of an archaeological site or other suspected cultural resource as defined by CEQA Guideline Section 15064.5, including darkened soil representing past human activity ("midden"), that could conceal material remains (e.g., worked stone, worked bone, fired

clay vessels, faunal bone, hearths, storage pits, or burials) is discovered during construction related earth-moving activities, all ground-disturbing activity within 100 feet of the resources shall be halted and the City Planning Manager shall be notified. The project sponsor shall hire a qualified archaeologist to conduct a field investigation. The City's Planning Manager shall consult with the archaeologist to assess the significance of the find. Impacts to any significant resources shall be mitigated to a less-than significant level through data recovery or other methods determined adequate by a qualified archaeologist and that are consistent with the Secretary of the Interior's Standards for Archaeological documentation. Any identified cultural resources shall be recorded on the appropriate DPR 523 (A-J) form and filed with the NWIC.

- b) Prior to the initiation of any site preparation and/or the start of construction, the project sponsor shall ensure that all construction workers receive training overseen by a qualified professional archaeologist who is experienced in teaching nonspecialists, to ensure that contractors can recognize archaeological resources in the event that any are discovered during construction.
- 6) Future development at Housing Opportunity Site 14 shall comply with the following measures:
- a) As part of the future project-level CEQA analysis of any discretionary permits that would allow ground-disturbing activities (e.g., grading, trenching, excavation, etc.) in the archaeological sensitive areas shown on Figure 4.5 1, exploratory trenching shall be conducted by a qualified archaeologist trained in both local prehistoric and historical archaeology within the proposed area of effect to determine if prehistoric- or historic-era archaeological resources are present. Explorations shall consist of at least one mechanically dug trench with excavation depths commensurate with the depth of proposed ground-disturbing activities. If any archaeological resources are exposed, these should be briefly documented, tarped for protection, and left in place. The results of the exploratory trenching shall be submitted to the Director of Community and Economic Development or the Director's designee. If it is determined by the project archaeologist that the proposed activities could damage an archaeological resource or that indications of other suspected archaeological resources are present (i.e., darkened soil "midden" representing past human activity), an Archaeological Resources Treatment Plan shall be prepared as described in MM CUL-2.1b below.
 - b) If recommended by the project archaeologist, an Archaeological Resources Treatment Plan shall be prepared by the project archaeologist that contains, at minimum:
 - Identification of the scope of work and range of subsurface effects (including location map and development plan), including requirements for preliminary field investigations.
 - Description of the environmental setting (past and present) and the historic/prehistoric background of the parcel (potential range of what might be found).
 - Monitoring schedules and individuals
 - Development of research questions and goals to be addressed by the investigation (what is significant vs. what is redundant information).
 - Detailed field strategy to record, recover, or avoid the finds and address research goals.
 - Analytical methods. Report structure and outline of document contents.

- Disposition of the artifacts.
- Security approaches or protocols for finds.
- Appendices: all site records, correspondence, and consultation with Native Americans, etc. Implementation of the treatment plan by the project archaeologist shall be required prior to the issuance of any permits related to ground-disturbing activities. The treatment plan shall utilize data recovery methods to reduce impacts on subsurface resources. The treatment plan shall be submitted to the Director of Community and Economic Development or the Director's designee, along with a summary of the outcomes of the treatment plan and all associated documentation and recordation.

- 7) Future development at Housing Opportunity Site 14 shall comply with the following measures:
 - a) Prior to the issuance of any discretionary permits that would allow ground-disturbing activities (e.g., grading, trenching, excavation, etc.) within the non-sensitive areas mapped on Figure 4.5 1, the project applicant shall hire a qualified archaeologist to develop a Worker's Environmental Awareness Program (WEAP) to train the construction crew on the legal requirements for the treatment of cultural resources as well as procedures to follow in the event of a cultural resources discovery. This training program shall be given to the crew before ground disturbing work commences and shall include handouts to be given to new workers.
 - b) The applicant shall note on all construction plans that require ground disturbing activities that there is a potential for exposing buried cultural resources including prehistoric Native American burials.
 - c) In the event that potentially significant archaeological resources are encountered during ground-disturbing activities occurring at Site 14, all activity within a 50-foot radius of the find shall be stopped, the Director of Community and Economic Development or the Director's designee shall be notified, and the project archaeologist shall examine the find. The project archaeologist shall (1) evaluate the find(s) to determine if they meet the definition of an archaeological resource; and (2) make appropriate recommendations regarding the disposition of such finds prior to issuance of building permits. Recommendations could include collection, recordation, and analysis of any significant cultural materials. A report of findings documenting any data recovery shall be submitted to the Director of Community and Economic Development or the Director's designee and the Northwest Information Center (if applicable).
- 8) Future development at Housing Opportunity Sites 1, 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 20, 22 and 23 shall comply with the following measures:
 - a) If human remains are discovered at any project construction site during any phase of construction, all ground-disturbing activity within 100 feet of the resources shall be halted and the City's Planning Manager and the San Mateo County Coroner shall be notified immediately, according to Section 5097.98 of the State Public Resources Code and Section 7050.5 of California's Health and Safety Code. If the remains are determined by the County coroner to be Native American, the Native American Heritage Commission (NAHC) shall be notified within 24 hours, and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. The project sponsor shall also retain a professional archaeologist with Native American burial experience to conduct a field

investigation of the specific site and consult with the Most Likely Descendant, if any, identified by the NAHC. As necessary, the archaeologist may provide professional assistance to the Most Likely Descendant, including the excavation and removal of the human remains. The City of San Bruno shall be responsible for approval of recommended mitigation as it deems appropriate, taking account of the provisions of State law, as set forth in CEQA Guidelines section 15064.5(e) and Public Resources Code section 5097.98. The project sponsor shall implement approved mitigation, to be verified by the City of San Bruno, before the resumption of ground-disturbing activities within 100 feet of where the remains were discovered.

- 9) All applicants and their contractors for projects on the Sites Inventory site must implement the following measures prior to and during construction:
 - a) Prior to issuance of any discretionary permits that would allow demolition or construction (grading, excavation, building, etc.) activities at the Housing Opportunity Sites, the applicant shall submit a construction management plan that demonstrates that:
 - Alternative fueled (e.g. biodiesel, electric) construction vehicles/equipment shall make up at least 15 percent of the fleet;
 - Buildings shall be constructed with local building materials of at least 10 percent (sourced from within 100 miles of the City limits); and
 - Contractors shall recycle and reuse at least 50 percent of construction waste or demolition materials.
- 10) Future development at all Housing Opportunity Sites must demonstrate adherence with the following design measures prior to issuance of any discretionary permits that would allow construction of residential units:
 - a) Construction of natural gas infrastructure and the use of natural gas appliances shall be prohibited;
 - b) Future developments shall include all electric appliances;
 - c) At a minimum, future development shall comply with offstreet electric vehicle requirements in the most recently adopted version of CALGreen Tier 2 requirements.
- 11) Future development at Housing Opportunity Sites 6, 8, 10, 16, 18, and 19 shall comply with the following measure:
 - a) The City shall require a Phase I Environmental Site Assessment (Phase I ESA) prior to issuance of any discretionary permits that would allow ground-disturbing activities, with a Phase II ESA also required if the Phase I ESA indicates evidence of potential site contamination. The City shall also require compliance with the site assessment(s) and any remediation, removal, and disposal requirements for soil, surface water, and/or groundwater contamination enforced by the Department of Toxic Substances Control (DTSC), Regional Water Quality Control Board (RWQCB), San Mateo County Department of Environmental Health (SMCEHS), California Division of Occupational Safety and Health (CalOSHA), U.S. Environmental Protection Agency (EPA), and other jurisdictional agencies.
- 12) Future development at Housing Opportunity Site 14 shall comply with the following measures:
 - a) Prior to the issuance of any discretionary permits that would allow ground-disturbing activities on Site 14 (outside of the area shown on Figure 4.9 1), the project proponent shall obtain a Phase I Environmental Site Assessment (ESA). The Phase I ESA shall be conducted in

accordance with the United States Environmental Protection Agency's All Appropriate Inquiries (AAI) Rule and the latest American Society for Testing and Materials (ASTM International) guidelines, and identify all potential subsurface contaminants warranting further investigation.

- b) If the Phase I ESA identifies any potential contaminants warranting further investigation, a Phase II ESA shall be prepared in accordance with the United States Environmental Protection Agency's AAI Rule and the latest ASTM International guidelines. As part of the Phase II, a qualified environmental professional (as defined in Title 40 of the California Code of Regulations) shall take soil, soil vapor, and groundwater samples as determined necessary by the environmental professional in the area of proposed disturbance at 0.5 feet below ground surface (bgs) to the maximum proposed depth of disturbance. Collected soil samples shall be tested for all potential contaminants identified in the Phase I ESA to determine if contaminants exceed California Division of Occupational Safety and Health (Cal/OSHA) exposure limits or San Mateo County Environmental Health Services (SMCEHS) environmental screening levels for residential uses.
- c) The results of the Phase II ESA shall be provided SMCEHS department. If determined necessary by the SMCEHS, a Redevelopment Management Plan (RMP) or equivalent shall be prepared and submitted to the SMCEHS and the Director of Community and Economic Development or the Director's designee that includes 1) an evaluation of whether redevelopment activities will create new exposure pathways to human health and the environment that pose unacceptable risks, and, if so, how those risks will be mitigated, and 2) a discussion of how contaminated media will be handled and disposed during construction activities. Once approved by the SMCEHS and Community and Economic Development Department, the RMP or equivalent shall be implemented by a qualified environmental professional. The results of the RMP or equivalent shall be submitted to the SMCEHS and the Director of Community and Economic Development or the Director's designee prior to the issuance of any issuance of any discretionary permits (e.g., grading, construction, occupancy, whichever occurs first).

13) Future development at Housing Opportunity Site 14 shall comply with the following measures:

- a) Prior to the issuance of any construction or building permits, the applicant shall submit a plan with a list of equipment to be used during construction that includes their height and proposed area of operation to the Director of Community and Economic Development or the Director's designee. The use of equipment in locations where it would penetrate critical aeronautical surfaces shall be expressly prohibited by any construction or building permits issued. The plan sets shall include a page depicting the critical aeronautical surfaces onsite, a list of all equipment with heights of 55 feet or greater and their respective heights, and informs construction workers that the use of equipment with heights that would penetrate critical aeronautical surfaces is prohibited.
- b) Future development at Housing Opportunity Site 14 shall comply with Policy AP-3 of the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport (ALUCP). Buildings with heights in excess of the applicable critical aeronautical surface as shown in Exhibit IV-17 at Housing Opportunity Site 14 shall be prohibited unless the Federal Aviation Administration determines the proposed building height is not a hazard to air navigation in an aeronautical study prepared pursuant to the filing of Form 7460-1. Proof of compliance with Policy AP-3 of the ALUCP shall be provided

to the Director of Community and Economic Development or the Director's designee prior to issuance of any construction or building permits.

14) Future development at all Housing Opportunity Sites shall implement the following measures during demolition and construction:

- Groundborne vibration studies shall be prepared by qualified professionals in accordance with industry-accepted methodology where heavy construction activities involving significant site grading, underground, or foundation work will occur within 25 feet of residential or other vibration sensitive uses. The industry accepted methodologies include the recommended vibration assessment procedure and thresholds provided by public agencies such as Caltrans or the Federal Highway Administration. The studies should identify necessary construction vibration controls to reduce both human annoyance and the possibility of cosmetic damage. Controls shall include, but not be limited to, the following measures:
 - o A list of all heavy construction equipment to be used for this project known to produce high vibration levels (tracked vehicles, vibratory compaction, jackhammers, hoe rams, etc.) shall be submitted to the City by the contractor. This list shall be used to identify equipment and activities that would potentially generate substantial vibration and to define the level of effort for reducing vibration levels below the thresholds.
 - o Place operating equipment on the construction site as far as possible from vibration-sensitive receptors.
 - o Use smaller equipment to minimize vibration levels below the limits.
 - o Avoid using vibratory rollers and tampers near sensitive areas.
 - o Select demolition methods not involving impact tools.
 - o Modify/design or identify alternative construction methods to reduce vibration levels below the limits.
 - o Avoid dropping heavy objects or materials.

Site Inventory						
#	Site	Address	# of Units	Plan Area	Rezone	Status
1	AT&T Building	840 San Bruno Ave.	320	TCP	No	vacant
2	Bank of America	465 San Mateo Ave.	45	TCP	No	active
3	Bayhill Shopping Center	851 Cherry Ave.	210	BHSP	No	active
4	Mike's Auto	529 El Camino Real	72	TCP	No	vacant
5	Citibank	475 San Mateo Ave.	60	TCP	No	active
6	Engvall School	2101 Sneath Ln.	118	none	No	vacant
7	Budget Motel (vacant)	850 El Camino Real	60	TCP	No	vacant
8	Edgemont School	500 Acacia Ave.	16	none	No	active
9	IHOP	590 El Camino Real	42	TCP	No	active
10	Underutilized site	116 San Marco Ave.	2	None	No	vacant
11	Melody Toyota Showroom	750 El Camino Real	34	TCP	No	vacant
12	Melody Toyota Lot	750 El Camino Real	41	TCP	No	vacant
13	Office Building	801-851 Traeger Dr.	205	BHSP	No	active
14	Tanforan	1150 El Camino Real	1,000	None	Yes	active
15	(vacant)	170 San Bruno Ave.	42	TCP	No	vacant
16	(vacant)	San Marco	2	none	No	vacant
17	Walgreens	333 El Camino Real	150	TCP	No	active
18	Russo Dental	1101 El Camino Real	15	None	Yes	active
19	San Bruno Pet Hospital	1111 El Camino Real	60	none	Yes	active
20	Chili's Restaurant	899 El Camino Real	100	TCP	No	active
21	(vacant)	104 San Bruno Ave.	25	TCP	No	vacant
22	Bedroom Express	426 El Camino Real	50	TCP	No	active
23	San Bruno Gas	401 San Mateo Ave.	40	TCP	No	active
Total			2,709			

Exhibit B

**EVIDENCE IN SUPPORT OF FINDINGS OF
SUBSTANTIAL COMPLIANCE
WITH THE REQUIREMENTS OF
STATE HOUSING ELEMENT LAW**

Column 1 of the table below is populated with sections of the Govt. Code applicable to Housing Element Law, Article 10.6 [65580 – 65589.11]. Column 2 of the table below indicates the section and page number within the San Bruno's 2023-2031 Housing Element update where the information can be found.

GOVERNMENT CODE PROVISION	HOUSING ELEMENT COMPLIANCE
Section 65583	
The housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing.	<ul style="list-style-type: none"> • Chapter 1 <ul style="list-style-type: none"> ○ page 3 ○ page 3-4 • Chapter 7 <ul style="list-style-type: none"> ○ pages 1-2 ○ pages 3-32
The housing element shall identify adequate sites for housing, including rental housing, factory-built housing, mobile-homes, and emergency shelters, and shall make adequate provision for the existing and projected needs of all economic segments of the community.	<ul style="list-style-type: none"> • Chapter 3 pages 15-16 • Chapter 6 <ul style="list-style-type: none"> ○ pages 13-16 ○ pages 18-22
The element shall contain all of the following:	
(a) An assessment of housing needs and an inventory of resources and constraints relevant to the meeting of these needs. The assessment and inventory shall include all of the following:	<ul style="list-style-type: none"> • Chapter 3 <ul style="list-style-type: none"> ○ pages 1-30, 35-37 ○ pages 30-35
(a)(1) An analysis of population and employment trends and documentation of projections	<ul style="list-style-type: none"> • Chapter 2 <ul style="list-style-type: none"> ○ pages 1-12 ○ pages 17-26 ○ pages 37-39 • Appendix E
(a)(1) A quantification of the locality's existing and projected housing needs for all income levels, including extremely low-income households, as defined in subdivision (b) of Section 50105 and Section 50106 of the Health and Safety Code. These existing and projected needs shall include the locality's share of the regional housing need in accordance with Section 65584. Local agencies shall calculate the subset of very -low-income households allotted under Section 65584 that qualify as extremely low-income households. The local agency may either use available census data to calculate the percentage of very low-income households that qualify as extremely low-income households or	<ul style="list-style-type: none"> • Chapter 1 pages 3-4 • Chapter 2 <ul style="list-style-type: none"> ○ pages 5-7 ○ page 46 • Chapter 6 <ul style="list-style-type: none"> ○ pages 1-5 ○ pages 23-24

presume that 50 percent of the very low-income households qualify as extremely low-income households. The number of extremely low-income households and very low-income households shall equal the jurisdiction's allocation of very low-income households pursuant to Section 65584.	
(a)(2) An analysis and documentation of household characteristics, including level of payment compared to ability to pay,	<ul style="list-style-type: none"> • Chapter 2 <ul style="list-style-type: none"> ○ pages 12-16, 23-28, 34-59 ○ pages 28-32
(a)(2) housing characteristics, including overcrowding, and	<ul style="list-style-type: none"> • Chapter 2 pages 32-34 • Appendix G pages 5-7,
(a)(2) housing stock condition.	<ul style="list-style-type: none"> • Chapter 2 pages 37-38
(a)(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, and an analysis of the relationship of the sites identified in the land inventory to the jurisdiction's duty to affirmatively further fair housing. Note: Please see Section 65583.2 regarding the land inventory.	<ul style="list-style-type: none"> • Chapter 3 pages 26-29 • Chapter 4 pages 52-55 • Chapter 6 pages 2-24
[Note that AB 2339 (Chapter 654, Statutes of 2022) amended Section 65583(a)(4). It does not apply to ABAG-area housing elements unless the first draft of the housing element is submitted to ABAG after January 31, 2023, or a draft is submitted after April 1, 2023. Therefore, the sections below include the statutory provisions of Section 65583(a)(4) effective in 2022. Jurisdictions adopting their housing element after January 1, 2023, should describe why AB 2339 is not applicable to them.]	<ul style="list-style-type: none"> • AB 2339 does not apply because the City submitted its first draft Housing Element to HCD on July 8, 2022.
(a)(4)(A) The identification of a zone or zones where emergency shelters are allowed as a permitted use without a conditional use or other discretionary permit. The identified zone or zones shall include sufficient capacity to accommodate the need for emergency shelter identified in paragraph (7), except that each local government shall identify a zone or zones that can accommodate at least one year-round emergency shelter.	<ul style="list-style-type: none"> • Chapter 3 pages 15-16

<p>(a)(4)(A) If the local government cannot identify a zone or zones with sufficient capacity, the local government shall include a program to amend its zoning ordinance to meet the requirements of this paragraph within one year of the adoption of the housing element. The local government may identify additional zones where emergency shelters are permitted with a conditional use permit.</p>	<ul style="list-style-type: none"> Chapter 3 pages 15-16
<p>(a)(4)(A) The local government shall also demonstrate that existing or proposed permit processing, development, and management standards are objective and encourage and facilitate the development of, or conversion to, emergency shelters.</p>	<ul style="list-style-type: none"> Chapter 3 pages 15-16
<p>(a)(4)(A) Emergency shelters may only be subject to those development and management standards that apply to residential or commercial development within the same zone except that a local government may apply written, objective standards that include all of the following:</p> <ul style="list-style-type: none"> (i) The maximum number of beds or persons permitted to be served nightly by the facility. (ii) Sufficient parking to accommodate all staff working in the emergency shelter, provided that the standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone. (iii) The size and location of exterior and interior onsite waiting and client intake areas. (iv) The provision of onsite management. (v) The proximity to other emergency shelters, provided that emergency shelters are not required to be more than 300 feet apart. (vi) The length of stay. (vii) Lighting. (viii) Security during hours that the emergency shelter is in operation. 	<ul style="list-style-type: none"> Chapter 3 pages 15-16
<p>(a)(4)(B) The permit processing, development, and management standards applied under this paragraph shall not be deemed to be discretionary acts within the meaning of the California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code).</p>	<ul style="list-style-type: none"> Chapter 3 pages 15-16
<p>(a)(4)(C) A local government that can demonstrate to the satisfaction of the department the existence of one or more</p>	<ul style="list-style-type: none"> Chapter 3 pages 15-16

emergency shelters either within its jurisdiction or pursuant to a multijurisdictional agreement that can accommodate that jurisdiction's need for emergency shelter identified in paragraph (7) may comply with the zoning requirements of subparagraph (A) by identifying a zone or zones where new emergency shelters are allowed with a conditional use permit.	
(a)(4)(D) A local government with an existing ordinance or ordinances that comply with this paragraph shall not be required to take additional action to identify zones for emergency shelters. The housing element must only describe how existing ordinances, policies, and standards are consistent with the requirements of this paragraph.	<ul style="list-style-type: none"> • Chapter 3 pages 15-16
(a)(5) 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 [Note: The types of housing identified in Section 65583(c)(1) include multifamily rental housing, factory-built housing, mobile homes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing.]	<ul style="list-style-type: none"> • Chapter 3 <ul style="list-style-type: none"> ○ pages 1-30 ○ pages 35-37
(a)(5) for persons with disabilities as identified in the analysis pursuant to paragraph (7),	<ul style="list-style-type: none"> • Chapter 2 pages 39-42
(a)(5) including land use controls,	<ul style="list-style-type: none"> • Chapter 3 pages 2-6
(a)(5) building codes and their enforcement,	<ul style="list-style-type: none"> • Chapter 2 page 57-58 • Chapter 3 <ul style="list-style-type: none"> ○ page 17 ○ page 22 ○ pages 28-29
(a)(5) site improvements,	<ul style="list-style-type: none"> • Chapter 3 pages 21, 26
(a)(5) fees and other exactions required of developers,	<ul style="list-style-type: none"> • Chapter 3 pages 21, 23-25
(a)(5) local processing and permit procedures,	<ul style="list-style-type: none"> • Chapter 3 pages 17-20, 26
(a)(5) and any locally adopted ordinances that directly impact the cost and supply of residential development.	<ul style="list-style-type: none"> • Chapter 3 page 13
(a)(5) The analysis shall also demonstrate local efforts to remove governmental constraints that hinder the locality from meeting its share of the	<ul style="list-style-type: none"> • Chapter 3 pages 12-15

regional housing need in accordance with Section 65584	
(a)(5) and from meeting the need for housing for persons with disabilities, supportive housing, transitional housing, and emergency shelters identified pursuant to paragraph (7).	<ul style="list-style-type: none"> Chapter 3 pages 15-16
(a)(6) An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing,	<ul style="list-style-type: none"> Chapter 3 pages 16-21
(a)(6) the price of land,	<ul style="list-style-type: none"> Chapter 3 pages 37-38
(a)(6) the cost of construction,	<ul style="list-style-type: none"> Chapter 3 pages 29-30
(a)(6) the requests to develop housing at densities below those anticipated in the analysis required by subdivision (c) of Section 65583.2,	<ul style="list-style-type: none"> Chapter 6 pages 10-11
(a)(6) 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 Section 65584.	<ul style="list-style-type: none"> Chapter 1 pages 3-4 Chapter 3 pages 18-20
(a)(6) The analysis shall also demonstrate local efforts to remove nongovernmental constraints that create a gap between the locality's planning for the development of housing for all income levels and the construction of that housing.	<ul style="list-style-type: none"> Chapter 3 pages 37-38
(a)(7) An analysis of any special housing needs, such as those of the	<ul style="list-style-type: none"> Chapter 2 page 36
(a)(7) elderly;	<ul style="list-style-type: none"> Chapter 2 pages 37-39
(a)(7) persons with disabilities, including a developmental disability, as defined in Section 4512 of the Welfare and Institutions Code;	<ul style="list-style-type: none"> Chapter 2 pages 39-43
(a)(7) large families;	<ul style="list-style-type: none"> Chapter 2 pages 44-45
(a)(7) farmworkers;	<ul style="list-style-type: none"> Chapter 2 pages 51-52
(a)(7) families with female heads of households;	<ul style="list-style-type: none"> Chapter 2 pages 43-44
(a)(7) and families and persons in need of emergency shelter.	<ul style="list-style-type: none"> Chapter 2 pages 46-51
(a)(7) The need for emergency shelter shall be assessed based on the capacity necessary to accommodate the most recent homeless point-in-time count conducted before the start of the planning period, the need for emergency shelter based on number of beds available on a year-round and seasonal basis, the number of shelter beds that go unused on an average monthly basis within a one-year period, and the percentage of	<ul style="list-style-type: none"> Chapter 3 pages 15-16

those in emergency shelters that move to permanent housing solutions.	
(a)(7) The need for emergency shelter may be reduced by the number of supportive housing units that are identified in an adopted 10-year plan to end chronic homelessness and that are either vacant or for which funding has been identified to allow construction during the planning period.	<ul style="list-style-type: none"> • This does not apply because the City has not adopted a 10 year plan to reduce homelessness.
(a)(7) An analysis of special housing needs by a city or county may include an analysis of the need for frequent user coordinated care housing services.	<ul style="list-style-type: none"> • This optional analysis is not included.
(a)(8) An analysis of opportunities for energy conservation with respect to residential development. Cities and counties are encouraged to include weatherization and energy efficiency improvements as part of public7y subsidized housing rehabilitation projects. This may include energy efficiency measures that encompass the building envelope, its heating and cooling systems, and its electrical system.	<ul style="list-style-type: none"> • Chapter 2 pages 57-59 • Chapter 3 page 28
(a)(9) An analysis of existing assisted housing developments that are eligible to change from low-income housing uses during the next 10 years due to termination of subsidy contracts, mortgage prepayment, or expiration of restrictions on use. "Assisted housing developments," for the purpose of this section, shall mean multifamily rental housing that receives governmental assistance under federal programs listed in subdivision (a) of Section 65863.10, state and local multifamily revenue bond programs, local redevelopment programs, the federal Community Development Block Grant Program, or local in-lieu fees. "Assisted housing developments" shall also include multifamily rental units that were developed pursuant to a local inclusionary housing program or used to qualify for a density bonus pursuant to Section 65915.	<ul style="list-style-type: none"> • Chapter 2 pages 55-57
(a)(9)(A) The analysis shall include a listing of each development by project name and address, the type of governmental assistance received, the earliest possible date of change from low-income use, and the total number of elderly and nonelderly units that could be lost from the	<ul style="list-style-type: none"> • Chapter 2 page 57

locality's low-income housing stock in each year during the 10-year period. For purposes of state and federally funded projects, the analysis required by this subparagraph need only contain information available on a statewide basis.	
(a)(9)(B) The analysis shall estimate the total cost of producing new rental housing that is comparable in size and rent levels, to replace the units that could change from low-income use, and an estimated cost of preserving the assisted housing developments. This cost analysis for replacement housing may be done aggregately for each five-year period and does not have to contain a project-by-project cost estimate.	<ul style="list-style-type: none"> • This analysis is not required because the City does not have any affordable units at risk of conversion.
(a)(9)(C) The analysis shall identify public and private nonprofit corporations known to the local government that have legal and managerial capacity to acquire and manage these housing developments.	<ul style="list-style-type: none"> • Chapter 2 pages 58-59
(a)(9)(D) The analysis shall identify and consider the use of all federal, state, and local financing and subsidy programs that can be used to preserve, for lower income households, the assisted housing developments, identified in this paragraph, including, but not limited to, federal Community Development Block Grant Program funds, tax increment funds received by a redevelopment agency of the community, and administrative fees received by a housing authority operating within the community. In considering the use of these financing and subsidy programs, the analysis shall identify the amounts of funds under each available program that have not been legally obligated for other purposes and that could be available for use in preserving assisted housing developments.	<ul style="list-style-type: none"> • Chapter 2 pages 57-58
(b) (1) A statement of the community's goals, quantified objectives, and policies relative to affirmatively furthering fair housing and to the maintenance, preservation, improvement, and development of housing.	<ul style="list-style-type: none"> • Chapter 4 • Chapter 6 page 23 • Chapter 7 Page 17, Program 3-B • Chapter 7 Page 20, Program 3-G, 3 • Chapter 7 Page 26, AFFH Policy 2
(2) It is recognized that the total housing needs identified pursuant to subdivision (a) may exceed available resources and the community's ability to satisfy this need within the content of the general plan requirements outlined in Article 5 (commencing with Section 65300). Under these	<ul style="list-style-type: none"> • Chapter 7

circumstances, the quantified objectives need not be identical to the total housing needs. The quantified objectives shall establish the maximum number of housing units by income category, including extremely low income, that can be constructed, rehabilitated, and conserved over a five-year time period.	
(c) A program that sets forth a schedule of actions during the planning period, each with a timeline for implementation, that 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	<ul style="list-style-type: none"> • Chapter 7
(c) through the administration of land use and development controls,	<ul style="list-style-type: none"> • Chapter 7
(c) the provision of regulatory concessions and incentives,	<ul style="list-style-type: none"> • Chapter 7
(c) the utilization of appropriate federal and state financing and subsidy programs when available,	<ul style="list-style-type: none"> • Chapter 7
(c) and the utilization of moneys in a low- and moderate-income housing fund of an agency if the locality has established a redevelopment project area pursuant to the Community Redevelopment Law (Division 24 (commencing with Section 33000) of the Health and Safety Code).	<ul style="list-style-type: none"> • Chapter 7
In order to make adequate provision for the housing needs of all economic segments of the community, the program shall do all of the following:	
(c)(1) 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 Section 65584.09.	<ul style="list-style-type: none"> • Chapter 6
(c)(1) Sites shall be identified as needed to affirmatively further fair housing	<ul style="list-style-type: none"> • Chapter 6 pages 15-16 • Appendix K

(c)(1) and to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing,	<ul style="list-style-type: none"> • Chapter 3 Table 3-4 • Chapter 4 page 52 • Chapter 7 Program 2-G
(c)(1) factory-built housing,	<ul style="list-style-type: none"> • Chapter 3 page 14
(c)(1) mobile homes,	<ul style="list-style-type: none"> • Chapter 3 page 14
(c)(1) housing for agricultural employees,	<ul style="list-style-type: none"> • Chapter 3 page 17
(c)(1) supportive housing,	<ul style="list-style-type: none"> • Chapter 3 page 12-13
(c)(1) single-room occupancy units,	<ul style="list-style-type: none"> • Chapter 3 pages 16-17
(c)(1) emergency shelters,	<ul style="list-style-type: none"> • Chapter 3 pages 15-16
(c)(1) and transitional housing.	<ul style="list-style-type: none"> • Chapter 3 page 12-13
(c)(1)(A) Where the inventory of sites, pursuant to paragraph (3) of subdivision (a), does not identify adequate sites to accommodate the need for groups of all household income levels pursuant to Section 65584, rezoning of those sites, including adoption of minimum density and development standards, for jurisdictions with an eight-year housing element planning period pursuant to Section 65588, shall be completed no later than three years after either the date the housing element is adopted pursuant to subdivision (f) of Section 65585 or the date that is 90 days after receipt of comments from the department pursuant to subdivision (b) of Section 65585, whichever is earlier, unless the deadline is extended pursuant to subdivision (f). Notwithstanding the foregoing, for a local government that fails to adopt a housing element that the department has found to be in substantial compliance with this article within 120 days of the statutory deadline in Section 65588 for adoption of the housing element, rezoning of those sites, including adoption of minimum density and development standards, shall be completed no later than one year from the statutory deadline in Section 65588 for adoption of the housing element.	<ul style="list-style-type: none"> • Chapter 6 <ul style="list-style-type: none"> ○ page 7 ○ table 6-4 page 17
(c)(1)(B) Where the inventory of sites, pursuant to paragraph (3) of subdivision (a), does not identify adequate sites to accommodate the need for groups of all household income levels pursuant to Section 65584, the program shall identify sites that can be developed for housing within the planning period pursuant to subdivision (h) of Section 65583.2. The identification of sites shall include all	<ul style="list-style-type: none"> • Chapter 6 Table 6-6

components specified in Section 65583.2. Note: Please see Section 65583.2 regarding the land inventory and conformance with subdivision (h).	
(c)(1)(C) Where the inventory of sites pursuant to paragraph (3) of subdivision (a) does not identify adequate sites to accommodate the need for farmworker housing, the program shall provide for sufficient sites to meet the need with zoning that permits farmworker housing use by right, including density and development standards that could accommodate and facilitate the feasibility of the development of farmworker housing for low- and very low income households.	<ul style="list-style-type: none"> • Chapter 7 Program 2-G
(c)(2) Assist in the development of adequate housing to meet the needs of extremely low, very low, low-, and moderate-income households.	<ul style="list-style-type: none"> • Chapter 4 page 16 • Chapter 6 pages 24-25 • Chapter 7 pages 10-11, Program 2-F • Chapter 7 page 11, Program 2-G • Chapter 7 page 12, Program 2-H
(c)(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	<ul style="list-style-type: none"> • Chapter 3 • Chapter 7 page 6, Program 1-I • Chapter 7 page 10, Program 2-F • Chapter 7 page 11, Program 2-G
(c)(3) 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.	<ul style="list-style-type: none"> • Chapter 2 pages 42-44 • Chapter 7 page 9, Program 2-D • Chapter 7 page 10, Program 2-F • Chapter 7 page 11, Program 2-G • Chapter 7 page 28, Program 4-M • Chapter 7 page 29, Program 4-O • Chapter 7 pages 30-31, Program 4-Q • Chapter 7 page 31, Program 4-R
(c)(3) Transitional housing and supportive housing shall be considered a residential use of property and shall be subject only to those restrictions that apply to other residential dwellings of the same type in the same zone.	<ul style="list-style-type: none"> • Chapter 3 pages 12-13
(c)(3) Supportive housing, as defined in Section 65650, shall be a use by right in all zones where multifamily and mixed uses are permitted, as provided in Article 11 (commencing with Section 65650).	<ul style="list-style-type: none"> • Chapter 3 pages 12-13
(c)(4) Conserve and improve the condition of the existing affordable housing stock, which may include addressing ways to mitigate the loss of	<ul style="list-style-type: none"> • Chapter 7 page 18, Program 3-E • Chapter 7 page 19, Program 3-G

dwelling units demolished by public or private action.	
(c)(5) 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 protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law.	<ul style="list-style-type: none"> • Chapter 4 • Chapter 7 page 16, Program 3-A • Chapter 7 page 21, Program 4-A • Chapter 7 page 21, Program 4-B • Chapter 7 page 22, Program 4-C • Chapter 7 page 23, Program 4-D • Chapter 7 pages 23-24, Program 4-E • Chapter 7 page 24, Program 4-F • Chapter 7 pages 24-25, Program 4-G • Chapter 7 page 25, Program 4-H • Chapter 7 page 26, Program 4-I • Chapter 7 pages 26-27, Program 4-J • Chapter 7 page 27, Program 4-K • Chapter 7 pages 27-28, Program 4-L • Chapter 7 page 28, Program 4-M • Chapter 7 pages 28-29, Program 4-N • Chapter 7 pages 29-30, Program 4-O • Chapter 7 page 30, Program 4-P • Chapter 7 pages 30-31, Program 4-Q • Chapter 7 page 31, Program 4-R • Chapter 7 pages 31-31, Program 4-S
(c)(6) Preserve for lower income households the assisted housing developments identified pursuant to paragraph (9) of subdivision (a).	<ul style="list-style-type: none"> • Chapter 7 page 19, Program 3-G • Chapter 7 page 19, Program 3-H
(c)(6) The program for preservation of the assisted housing developments shall utilize, to the extent necessary, all available federal, state, and local financing and subsidy programs identified in paragraph (9) of subdivision (a), except where a community has other urgent needs for which alternative funding sources are not available.	<ul style="list-style-type: none"> • Chapter 7 page 19, Program 3-G • Chapter 7 page 19, Program 3-H
(c)(6) The program may include strategies that involve local regulation and technical assistance.	<ul style="list-style-type: none"> • Chapter 7 page 19, Program 3-G • Chapter 7 page 19, Program 3-H
(c)(7) Develop a plan that incentivizes and promotes the creation of accessory dwelling units that can be offered at affordable rent, as defined in Section 50053 of the Health and Safety Code, for very low, low-, or moderate-income households. For purposes of this paragraph, “accessory dwelling units” has the same meaning as “accessory dwelling unit” as defined in	<ul style="list-style-type: none"> • Chapter 6 pages 23-24 • Chapter 7 page 30, Program 4-P

paragraph (4) of subdivision (i) of Section 65852.2.\	
(c)(8) Include an identification of the agencies and officials responsible for the implementation of the various actions and the means by which consistency will be achieved with other general plan elements and community goals.	<ul style="list-style-type: none"> • Chapter 7 • Chapter 1 pages 5-7
(c)(9) Include a diligent effort by the local government to achieve public participation of all economic segments of the community in the development of the housing element, and the program shall describe this effort.	<ul style="list-style-type: none"> • Chapter 5
(c)(10)(A) Affirmatively further fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2. The program shall include an assessment of fair housing in the jurisdiction that shall include all of the following components:	<ul style="list-style-type: none"> • Chapter 4
(c)(10)(A)(i) A summary of fair housing issues in the jurisdiction	<ul style="list-style-type: none"> • Appendices C-I • Chapter 4 pages 58-59
(c)(10)(A)(i) and an assessment of the jurisdiction's fair housing enforcement and fair housing outreach capacity.	<ul style="list-style-type: none"> • Chapter 4 pages 5-8
(c)(10)(A)(ii) An analysis of available federal, state, and local data and knowledge to identify integration and segregation patterns and trends,	<ul style="list-style-type: none"> • Chapter 4 pages 9-27
(c)(10)(A)(ii) racially or ethnically concentrated areas of poverty and affluence,	<ul style="list-style-type: none"> • Chapter 4 page pages 28-29
(c)(10)(A)(ii) disparities in access to opportunity,	<ul style="list-style-type: none"> • Chapter 2, page 9 • Chapter 4, pages 14, 19, 30-41, 58 • Chapter 7 <ul style="list-style-type: none"> ○ page 26 Programs 4-J, 4-K, 4-L • Appendix H
(c)(10)(A)(ii) and disproportionate housing needs,	<ul style="list-style-type: none"> • Chapter 4 <ul style="list-style-type: none"> ○ pages 42-50, 54-56 • Chapter 7 <ul style="list-style-type: none"> ○ Page 10 Program 2-G ○ Page 12 Program 2-H ○ Page 23 Program 4-E ○ Page 24 Programs 4-F, 4-G ○ Page 25 Programs 4-I, 4-H ○ Page 28 Program 4-M ○ Page 29 Program 4-N ○ Page 29 Program 4-O ○ Page 30 Program 4-P ○ Page 30 Program 4-Q

	<ul style="list-style-type: none"> ○ Page 31 Program 4-R ○ Page 31 Program 4-S • Appendix C <ul style="list-style-type: none"> ○ Section IV pages 28-34 • Appendix D page 52 • Appendix G page 5-6
(c)(10)(A)(ii) including displacement risk.	<ul style="list-style-type: none"> • Chapter 2 page 28 • Chapter 4 pages 3-4, 8, 18, 42, 48, 49, • Chapter 7 <ul style="list-style-type: none"> ○ Page 24 Programs 4-F, 4-G ○ Page 25 Program 4-H ○ Page 26 Program 4-I ○ Page 31 Program 4-S • Appendix G page 7
(c)(10)(A)(ii) The analysis shall identify and examine such patterns, trends, areas, disparities, and needs, both within the jurisdiction.	<ul style="list-style-type: none"> • Chapter 2 • Chapter 4 <ul style="list-style-type: none"> ○ Pages 9-16 • Chapter 7 <ul style="list-style-type: none"> ○ Page 21 Program 4-A ○ Page 26 Program 4-J
(c)(10)(A)(ii) and comparing the jurisdiction to the region in which it is located, based on race and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2) and Section 65008.	<ul style="list-style-type: none"> • Chapter 3 pages 25,26 • Chapter 4 pages 7, 8, 10, 18, 21, 28, 30, 31, 33, 36, 43, 47
(c)(10)(A)(iii) An assessment of the contributing factors, including the local and regional historical origins	<ul style="list-style-type: none"> • Chapter 4, Section J pages 54-55
(c)(10)(A)(iii) and current policies and practices, for the fair housing issues identified under clauses (i) and (ii).	<ul style="list-style-type: none"> • Appendix A <ul style="list-style-type: none"> ○ Program 3-E ○ Program 6-A ○ Program 6-B
(c)(10)(A)(iv) An identification of the jurisdiction's fair housing priorities and goals, giving highest priority to those factors identified in clause (iii) that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance,	<ul style="list-style-type: none"> • Chapter 4 Pages 8, 16, 52-59
(c)(10)(A)(iv) and identifying the metrics and milestones for determining what fair housing results will be achieved.	<ul style="list-style-type: none"> • Chapter 4 pages 21-32
(c)(10)(A)(v) Strategies and actions to implement those priorities and goals, which may include, but are not limited to, enhancing mobility strategies	<ul style="list-style-type: none"> • Chapter 4 pages 21-32

(c)(10)(A)(v) and encouraging development of new affordable housing in areas of opportunity,	<ul style="list-style-type: none"> Chapter 4 pages 28-32, AFFH Policy 3
(c)(10)(A)(v) as well as place-based strategies to encourage community revitalization, including preservation of existing affordable housing,	<ul style="list-style-type: none"> Chapter 7 pages 26-28, AFFH Policy 2 Chapter 7 page 19, Program 3-G Chapter 7 page 19, Program 3-H
(c)(10)(A)(v) and protecting existing residents from displacement.	<ul style="list-style-type: none"> Chapter 7 page 19, Program 3-H Chapter 7 pages 21-26, AFFH Policy 1
(c)(10)(B) A jurisdiction that completes or revises an assessment of fair housing pursuant to Subpart A (commencing with Section 5.150) of Part 5 of Subtitle A of Title 24 of the Code of Federal Regulations, as published in Volume 80 of the Federal Register, Number 136, page 42272, dated July 16, 2015, or an analysis of impediments to fair housing choice in accordance with the requirements of Section 91.225 of Title 24 of the Code of Federal Regulations in effect before August 17, 2015, may incorporate relevant portions of that assessment or revised assessment of fair housing or analysis or revised analysis of impediments to fair housing into its housing element.	<ul style="list-style-type: none"> Not applicable
(c)(10)(C) The requirements of this paragraph shall apply to housing elements due to be revised pursuant to Section 65588 on or after January 1, 2021.	<ul style="list-style-type: none"> See responses to (c)(10)(A)(i) through (v) above.
(d)(1) A local government may satisfy all or part of its requirement to identify a zone or zones suitable for the development of emergency shelters pursuant to paragraph (4) of subdivision (a) by adopting and implementing a multijurisdictional agreement, with a maximum of two other adjacent communities, that requires the participating jurisdictions to develop at least one year-round emergency shelter within two years of the beginning of the planning period.	<ul style="list-style-type: none"> Not applicable because the City has no such multijurisdictional agreement for emergency shelters.
(d)(2) The agreement shall allocate a portion of the new shelter capacity to each jurisdiction as credit toward its emergency shelter need, and each jurisdiction shall describe how the capacity was allocated as part of its housing element.	<ul style="list-style-type: none"> Not applicable because the City has no such multijurisdictional agreement for emergency shelters.
(d)(3) Each member jurisdiction of a multijurisdictional agreement shall describe in its housing element all of the following:	<ul style="list-style-type: none"> Not applicable because the City has no such multijurisdictional agreement for emergency shelters.

<p>(d)(3)(A) How the joint facility will meet the jurisdiction's emergency shelter need.</p> <p>(d)(3)(B) The jurisdiction's contribution to the facility for both the development and ongoing operation and management of the facility.</p> <p>(d)(3)(C) The amount and source of the funding that the jurisdiction contributes to the facility.</p>	<ul style="list-style-type: none"> Not applicable because the City has no such multijurisdictional agreement for emergency shelters.
<p>(d)(4) The aggregate capacity claimed by the participating jurisdictions in their housing elements shall not exceed the actual capacity of the shelter.</p>	<ul style="list-style-type: none"> Not applicable because the City has no such multijurisdictional agreement for emergency shelters.
<p>(e) Except as otherwise provided in this article, amendments to this article that alter the required content of a housing element shall apply to both of the following:</p>	<ul style="list-style-type: none"> Not applicable.
<p>(1) A housing element or housing element amendment prepared pursuant to subdivision (e) of Section 65588 or Section 65584.02, when a city, county, or city and county submits a draft to the department for review pursuant to Section 65585 more than 90 days after the effective date of the amendment to this section.</p>	<ul style="list-style-type: none"> Not applicable.
<p>(2) Any housing element or housing element amendment prepared pursuant to subdivision (e) of Section 65588 or Section 65584.02, when the city, county, or city and county fails to submit the first draft to the department before the due date specified in Section 65588 or 65584.02.</p>	<ul style="list-style-type: none"> Not applicable.
<p>(f) – (j): Not applicable</p>	
<ul style="list-style-type: none"> Section 65583.1(a) 	
<p>(a) The Department of Housing and Community Development, in evaluating a proposed or adopted housing element for substantial compliance with this article, ... may also allow a city or county to identify sites for accessory dwelling units based on the number of accessory dwelling units developed in the prior housing element planning period whether or not the units are permitted by right, the need for these units in the community, the resources or incentives available for their development, and any other relevant factors, as determined by the department.</p>	<ul style="list-style-type: none"> Chapter 6 pages 22-23
<p>(b) Sites that contain permanent housing units located on a military base undergoing closure or conversion as a result of action pursuant to the Defense Authorization Amendments and Base</p>	<ul style="list-style-type: none"> No applicable because none of the housing sites are former military bases.

Closure and Realignment Act (Public Law 100-526), the Defense Base Closure and Realignment Act of 1990 (Public Law 101-510), or any subsequent act requiring the closure or conversion of a military base may be identified as an adequate site if the housing element demonstrates that the housing units will be available for occupancy by households within the planning period of the element. No sites containing housing units scheduled or planned for demolition or conversion to nonresidential uses shall qualify as an adequate site.	
<ul style="list-style-type: none"> • Section 65583.2 	
(a) A city's or county's inventory of land suitable for residential development pursuant to paragraph (3) of subdivision (a) of Section 65583 shall be used to identify sites throughout the community, consistent with paragraph (10) of subdivision (c) of Section 65583,	<ul style="list-style-type: none"> • Chapter 6 pages 15-16 • Appendix K
(a) that can be developed for housing within the planning period and that are sufficient to provide for the jurisdiction's share of the regional housing need for all income levels pursuant to Section 65584. As used in this section, "land suitable for residential development" includes all of the following sites that meet the standards set forth in subdivisions (c) and (g):	<ul style="list-style-type: none"> • Chapter 6 page 1
(a)(1) Vacant sites zoned for residential use.	<ul style="list-style-type: none"> • Chapter 6 Table 6-4
(a)(2) Vacant sites zoned for nonresidential use that allows residential development.	<ul style="list-style-type: none"> • Chapter 6 Table 6-4
(a)(3) Residentially zoned sites that are capable of being developed at a higher density, including sites owned or leased by a city, county, or city and county	<ul style="list-style-type: none"> • Chapter 6 Table 6-4
(a)(4) Sites zoned for nonresidential use that can be redeveloped for residential use, and for which the housing element includes a program to rezone the site, as necessary, rezoned for, to permit residential use, including sites owned or leased by a city, county, or city and county.	<ul style="list-style-type: none"> • Chapter 6 Table 6-4 • Chapter 7 Program 2-E
(b) The inventory of land shall include all of the following:	
(b)(1) A listing of properties by assessor parcel number.	<ul style="list-style-type: none"> • Chapter 6 pages 15-16 • Appendix K

(b)(2) The size of each property listed pursuant to paragraph (1), and the general plan designation and zoning of each property.	<ul style="list-style-type: none"> • Chapter 6 pages 15-16 • Appendix K
(b)(3) For nonvacant sites, a description of the existing use of each property.	<ul style="list-style-type: none"> • Chapter 6 pages 15-16 • Appendix K
(b)(3) If a site subject to this paragraph is owned by the city or county, the description shall also include whether there are any plans to dispose of the property during the planning period and how the city or county will comply with Article 8 (commencing with Section 54220) of Chapter 5 of Part 1 of Division 2 of Title 5.	<ul style="list-style-type: none"> • Not applicable because none of the sites in the inventory are city-owned.
(b)(4) A general description of any environmental constraints to the development of housing within the jurisdiction, the documentation for which has been made available to the jurisdiction. This information need not be identified on a site-specific basis.	<ul style="list-style-type: none"> • Chapter 3 pages 35-37
(b)(5)(A) A description of existing or planned water, sewer, and other dry utilities supply, including the availability and access to distribution facilities.	<ul style="list-style-type: none"> • Chapter 3 pages 21, 27
(b)(5)(B) Parcels included in the inventory must have sufficient water, sewer, and dry utilities supply available and accessible to support housing development or be included in an existing general plan program or other mandatory program or plan, including a program or plan of a public or private entity providing water or sewer service, to secure sufficient water, sewer, and dry utilities supply to support housing development. This paragraph does not impose any additional duty on the city or county to construct, finance, or otherwise provide water, sewer, or dry utilities to parcels included in the inventory.	<ul style="list-style-type: none"> • Chapter 3 pages 21, 27
(b)(6) Sites identified as available for housing for above moderate-income households in areas not served by public sewer systems. This information need not be identified on a site-specific basis.	<ul style="list-style-type: none"> • Chapter 6 Table 6-4
(b)(7) A map that shows the location of the sites included in the inventory, such as the land use map from the jurisdiction's general plan, for reference purposes only.	<ul style="list-style-type: none"> • Chapter 6 page 13
(c) Based on the information provided in subdivision (b), a city or county shall determine whether each site in the inventory can	<ul style="list-style-type: none"> • Appendix K

accommodate the development of some portion of its share of the regional housing need by income level during the planning period, as determined pursuant to Section 65584. The inventory shall specify for each site the number of units that can realistically be accommodated on that site and whether the site is adequate to accommodate lower income housing, moderate-income housing, or above moderate-income housing.	
(c) A nonvacant site identified pursuant to paragraph (3) or (4) of subdivision (a) in a prior housing element and a vacant site that has been included in two or more consecutive planning periods that was not approved to develop a portion of the locality's housing need shall not be deemed adequate to accommodate a portion of the housing need for lower income households that must be accommodated in the current housing element planning period unless the site is zoned at residential densities consistent with paragraph (3) of this subdivision and the site is subject to a program in the housing element requiring rezoning within three years of the beginning of the planning period to allow residential use by right for housing developments in which at least 20 percent of the units are affordable to lower income households. An unincorporated area in a nonmetropolitan county pursuant to clause (ii) of subparagraph (B) of paragraph (3) shall not be subject to the requirements of this subdivision to allow residential use by right.	<ul style="list-style-type: none"> Chapter 6 Table 6-4
(c) Notwithstanding the foregoing, for a local government that fails to adopt a housing element that the department has found to be in substantial compliance with state law within 120 days of the statutory deadline in Section 65588 for adoption of the housing element, rezoning pursuant to this subdivision shall be completed no later than one year from the statutory deadline in Section 65588 for adoption of the housing element.	<ul style="list-style-type: none"> San Bruno intends to adopt its Housing Element by the January 31, 2023 due date and therefore will not be subject to the one-year rezoning requirement.
(c) The analysis shall determine whether the inventory can provide for a variety of types of housing, including multifamily rental housing,	<ul style="list-style-type: none"> Chapter 4 page 58
(c) factory-built housing, mobilehomes,	<ul style="list-style-type: none"> Chapter 3 page 15

(c) housing for agricultural employees, supportive housing,	<ul style="list-style-type: none"> • Chapter 3 pages 16-17 • Chapter 7 Program 2-G
(c) single-room occupancy units,	<ul style="list-style-type: none"> • Chapter 3 pages 16-17 • Chapter 7 Program 2-G
(c) emergency shelters, and	<ul style="list-style-type: none"> • Chapter 3 page 15 • Chapter 7 Program 2-G
(c) transitional housing	<ul style="list-style-type: none"> • Chapter 3 pages 12-13
(c) and whether the inventory affirmatively furthers fair housing.	<ul style="list-style-type: none"> • Chapter 4 page 58
(c) The city or county shall determine the number of housing units that can be accommodated on each site as follows:	
(c)(1) If local law or regulations require the development of a site at a minimum density, the department shall accept the planning agency's calculation of the total housing unit capacity on that site based on the established minimum density. If the city or county does not adopt a law or regulation requiring the development of a site at a minimum density, then it shall demonstrate how the number of units determined for that site pursuant to this subdivision will be accommodated.	<ul style="list-style-type: none"> • Chapter 6 Table 6-4 • Chapter 6 page 6
(c)(2) The number of units calculated pursuant to paragraph (1) shall be adjusted as necessary, based on the land use controls and site improvements requirement identified in paragraph (5) of subdivision (a) of Section 65583,	<ul style="list-style-type: none"> • Chapter 6 Table 6-4 • Chapter 6 page 6
(c)(2) the realistic development capacity for the site,	<ul style="list-style-type: none"> • Chapter 6 Table 6-4 • Chapter 6 page 6
(c)(2) typical densities of existing or approved residential developments at a similar affordability level in that jurisdiction,	<ul style="list-style-type: none"> • Chapter 6 Table 6-4 • Chapter 6 page 6
(c)(2) and on the current or planned availability and accessibility of sufficient water, sewer, and dry utilities.	<ul style="list-style-type: none"> • Chapter 6 Table 6-4
(c)(2)(A) A site smaller than half an acre shall not be deemed adequate to accommodate lower income housing need unless the locality can demonstrate that sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower income housing units as projected for the site or unless the locality provides other evidence to the department that the site is adequate to accommodate lower income housing.	<ul style="list-style-type: none"> • Chapter 6 pages 11 and 14

(c)(2)(B) A site larger than 10 acres shall not be deemed adequate to accommodate lower income housing need unless the locality can demonstrate that sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower income housing units as projected for the site or unless the locality provides other evidence to the department that the site can be developed as lower income housing.	<ul style="list-style-type: none"> Chapter 6 pages 11 and 14
(c)(2)(B) For purposes of this subparagraph, “site” means that portion of a parcel or parcels designated to accommodate lower income housing needs pursuant to this subdivision.	<ul style="list-style-type: none"> Appendix K
(c)(2)(C) A site may be presumed to be realistic for development to accommodate lower income housing need if, at the time of the adoption of the housing element, a development affordable to lower income households has been proposed and approved for development on the site.	<ul style="list-style-type: none"> Appendix K
(c)(3) For the number of units calculated to accommodate its share of the regional housing need for lower income households pursuant to paragraph (2), a city or county shall do either of the following:	
(c)(3)(A) Provide an analysis demonstrating how the adopted densities accommodate this need. The analysis shall include, but is not limited to, factors such as market demand, financial feasibility, or information based on development project experience within a zone or zones that provide housing for lower income households.	<ul style="list-style-type: none"> Chapter 6 Table 6-6 Chapter 6 page 17
(c)(3)(B) The following densities shall be deemed appropriate to accommodate housing for lower income households: (i) For an incorporated city within a nonmetropolitan county and for a nonmetropolitan county that has a micropolitan area: sites allowing at least 15 units per acre. (ii) For an unincorporated area in a nonmetropolitan county not included in clause (i): sites allowing at least 10 units per acre. (iii) For a suburban jurisdiction: sites allowing at least 20 units per acre. (iv) For a jurisdiction in a metropolitan county: sites allowing at least 30 units per acre.	<ul style="list-style-type: none"> Chapter 6 page 11
(4)(A) For a metropolitan jurisdiction:	<ul style="list-style-type: none"> Chapter 6 page 11

(4)(A)(i) At least 25 percent of the jurisdiction's share of the regional housing need for moderate-income housing shall be allocated to sites with zoning that allows at least 4 units of housing, but not more than 100 units per acre of housing.	<ul style="list-style-type: none"> Chapter 6 Table 6-4
(4)(A)(ii) At least 25 percent of the jurisdiction's share of the regional housing need for above moderate-income housing shall be allocated to sites with zoning that allows at least 4 units of housing.	<ul style="list-style-type: none"> Chapter 6 Table 6-4
<p>(B) The allocation of moderate-income and above moderate-income housing to sites pursuant to this paragraph shall not be a basis for the jurisdiction to do either of the following:</p> <p>(i) Deny a project that does not comply with the allocation.</p> <p>(ii) Impose a price minimum, price maximum, price control, or any other exaction or condition of approval in lieu thereof. This clause does not prohibit a jurisdiction from imposing any price minimum, price maximum, price control, exaction, or condition in lieu thereof, pursuant to any other law.</p> <p>(iii) The provisions of this subparagraph do not constitute a change in, but are declaratory of, existing law with regard to the allocation of sites pursuant to this section.</p>	
(C) This paragraph does not apply to an unincorporated area.	
(D) For purposes of this paragraph:	
(i) "Housing development project" has the same meaning as defined in paragraph (2) of subdivision (h) of Section 65589.5.	
(ii) "Unit of housing" does not include an accessory dwelling unit or junior accessory dwelling unit that could be approved pursuant to Section 65852.2 or Section 65852.22 or through a local ordinance or other provision implementing either of those sections. This paragraph shall not limit the ability of a local government to count the actual production of accessory dwelling units or junior accessory dwelling units in an annual progress report submitted pursuant to Section 65400 or other progress report as determined by the department.	
(E) Nothing in this subdivision shall preclude the subdivision of a parcel, provided that the	

subdivision is subject to the Subdivision Map Act (Division 2 (commencing with Section 66410)) or any other applicable law authorizing the subdivision of land.	
(d) For purposes of this section, a metropolitan county, nonmetropolitan county, and nonmetropolitan county with a micropolitan area shall be as determined by the United States Census Bureau. A nonmetropolitan county with a micropolitan area includes the following counties: Del Norte, Humboldt, Lake, Mendocino, Nevada, Tehama, and Tuolumne and other counties as may be determined by the United States Census Bureau to be nonmetropolitan counties with micropolitan areas in the future.	
(e) (1) Except as provided in paragraph (2), a jurisdiction shall be considered suburban if the jurisdiction does not meet the requirements of clauses (i) and (ii) of subparagraph (B) of paragraph (3) of subdivision (c) and is located in a Metropolitan Statistical Area (MSA) of less than 2,000,000 in population, unless that jurisdiction's population is greater than 100,000, in which case it shall be considered metropolitan. A county, not including the City and County of San Francisco, shall be considered suburban unless the county is in an MSA of 2,000,000 or greater in population in which case the county shall be considered metropolitan.	
(2)(A)(i) Notwithstanding paragraph (1), if a county that is in the San Francisco-Oakland-Fremont California MSA has a population of less than 400,000, that county shall be considered suburban. If this county includes an incorporated city that has a population of less than 100,000, this city shall also be considered suburban. This paragraph shall apply to a housing element revision cycle, as described in subparagraph (A) of paragraph (3) of subdivision (e) of Section 65588, that is in effect from July 1, 2014, to December 31, 2028, inclusive.	
(2)(A)(ii) A county subject to this subparagraph shall utilize the sum existing in the county's housing trust fund as of June 30, 2013, for the development and preservation of housing affordable to low- and very low-income households.	

<p>(f) A jurisdiction shall be considered metropolitan if the jurisdiction does not meet the requirements for “suburban area” above and is located in an MSA of 2,000,000 or greater in population unless that jurisdiction’s population is less than 25,000 in which case it shall be considered suburban.</p> <p>(g)(1) For sites described in paragraph (3) of subdivision (b) [non-vacant sites], the city or county shall specify the additional development potential for each site within the planning period and shall provide an explanation of the methodology used to determine the development potential.</p>	<ul style="list-style-type: none"> • Chapter 6 pages 10-11 • Chapter 6 Table 6-4
<p>(g)(1) The methodology shall consider factors including the extent to which existing uses may constitute an impediment to additional residential development,</p>	<ul style="list-style-type: none"> • Chapter 6 Table 6-6
<p>(g)(1) the city’s or county’s past experience with converting existing uses to higher density residential development,</p>	<ul style="list-style-type: none"> • Chapter 6 pages 6-7
<p>(g)(1) the current market demand for the existing use,</p>	<ul style="list-style-type: none"> • Chapter 6 Table 6-6
<p>(g)(1) an analysis of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development,</p>	<ul style="list-style-type: none"> • Chapter 6 Table 6-6
<p>(g)(1) development trends,</p>	<ul style="list-style-type: none"> • Chapter 6 page 6-9
<p>(g)(1) market conditions,</p>	<ul style="list-style-type: none"> • Chapter 6 pages 8-9
<p>(g)(1) and regulatory or other incentives or standards to encourage additional residential development on these sites.</p>	<ul style="list-style-type: none"> • Chapter 7 Program 2-E • Chapter 7 Program 2-H • Chapter 7 Program 2-K • Chapter 7 Program 2-M
<p>(g)(2) In addition to the analysis required in paragraph (1), when a city or county is relying on nonvacant sites described in paragraph (3) of subdivision (b) to accommodate 50 percent or more of its housing need for lower income households, the methodology used to determine additional development potential shall demonstrate that the existing use identified pursuant to paragraph (3) of subdivision (b) does not constitute an impediment to additional residential development during the period covered by the housing element. An existing use shall be presumed to impede additional</p>	<ul style="list-style-type: none"> • Chapter 6 Table 6-6

residential development, absent findings based on substantial evidence that the use is likely to be discontinued during the planning period.	
(g)(3) Notwithstanding any other law, and in addition to the requirements in paragraphs (1) and (2), sites that currently have residential uses, or within the past five years have had residential uses that have been vacated or demolished, that are or were subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low income, subject to any other form of rent or price control through a public entity's valid exercise of its police power, or occupied by low or very low income households, shall be subject to a policy requiring the replacement of all those units affordable to the same or lower income level as a condition of any development on the site. Replacement requirements shall be consistent with those set forth in paragraph (3) of subdivision (c) of Section 65915.	<ul style="list-style-type: none"> • Not applicable because none of the sites in the inventory contain existing housing units.
(h) The program required by subparagraph (A) of paragraph (1) of subdivision (c) of Section 65583 shall accommodate 100 percent of the need for housing for very low and low-income households allocated pursuant to Section 65584 for which site capacity has not been identified in the inventory of sites pursuant to paragraph (3) of subdivision (a) on sites that shall be zoned to permit owner-occupied and rental multifamily residential use by right for developments in which at least 20 percent of the units are affordable to lower income households during the planning period.	<ul style="list-style-type: none"> • Chapter 7 Program 2-D
(h) These sites shall be zoned with minimum density and development standards that permit at least	<ul style="list-style-type: none"> • Chapter 7 Program 2-D
(h) 16 units per site at a density of at least 16 units per acre in jurisdictions described in clause (i) of subparagraph (B) of paragraph (3) of subdivision (c),	
(h) shall be at least 20 units per acre in jurisdictions described in clauses (iii) and (iv) of subparagraph (B) of paragraph (3) of subdivision (c)	<ul style="list-style-type: none"> • Chapter 7 Program 2-D

(h) and shall meet the standards set forth in subparagraph (B) of paragraph (5) of subdivision (b).	<ul style="list-style-type: none"> • Chapter 7 Program 2-D
(h) At least 50 percent of the very low and low-income housing need shall be accommodated on sites designated for residential use and for which nonresidential uses or mixed uses are not permitted, except that a city or county may accommodate all of the very low and low-income housing need on sites designated for mixed uses if those sites allow 100 percent residential use and require that residential use occupy 50 percent of the total floor area of a mixed-use project.	<ul style="list-style-type: none"> • Appendix K

Exhibit C

RESPONSE TO HCD FINDINGS

HE Section	Subsection	No.	Comment	SB Response	HE Section/Page#
Appendix A Review and Revision		1	Analysis must be included for all programs in the previous housing element including progress and actual results for each.	More analysis has been added to each program evaluation for the previous cycle.	Appendix A
Appendix A Review and Revision		2	Provide a description of how the objectives and programs of the updated element incorporate changes resulting from the evaluation of the previous HE.	More description about how certain programs from the previous Housing Element were incorporated into the current Housing Element have been added throughout the evaluation	Appendix A
Appendix A Review and Revision		3	If the City failed to make adequate sites available to accommodate the regional housing need in the prior planning period, the City must zone or rezone sites to accommodate any unaccommodated need within the first year of the 2023-2031 planning period. (Gov. Code, § 65584.09.) Program 2-A was necessary to demonstrate compliance with the adequate sites requirement in the previous planning period, however it was not completed. To demonstrate adequate sites were made available in the prior planning period, the element must include an analysis or programs demonstrating compliance with the statutory requirements. For additional information, see HCD's AB 1233 Memorandum at https://www.hcd.ca.gov/hcd-memos and the Building Blocks at https://www.hcd.ca.gov/review-and-revise .	Program 2-A from the previous cycle was to be completed within 3 years of Housing Element adoption but was instead completed six years after element adoption. Adequate sites were made available after the initial delay. However, the city continued to entitle housing projects in the TCP during the delay.	Program 2-A on page 13
Appendix A Review and Revision		4	The element must evaluate the effectiveness of 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).	Additional evaluation regarding the effectiveness of those programs that impact special needs populations has been added.	See Appendix page A-54
Chapter 4 AFFH	Integration & Segregation	5	The element must evaluate racial patterns at a regional basis, comparing the City to the region.	Added narrative and maps	pp. 4-8 to 4-11
Chapter 4 AFFH	Integration & Segregation	6	Must discuss and analyze data on persons with disabilities for trends over time and patterns across census tracts as well as evaluate patterns at a regional basis.	New information from Housing Choices and maps	pp. 4-17 to 4-19
Chapter 4 AFFH	Integration & Segregation	7	Must describe and analyze concentrations of income and familial status geographically throughout the City.	Added narrative and maps	income: pp. 4-14 to 4-17 familial status: pp. 4-19 to 4-21
Chapter 4 AFFH	Access to Opportunity	8	While the element identified an area of access to education with lower outcomes, it must describe and analyze how that affects fair housing and other factors.	Added narrative and maps	pp. 4-28 to 4-30 and summary on pp. 4-33 to 4-37

Chapter 4 AFFH	Access to Opportunity	9	The element should describe and analyze the access to jobs throughout the City and for protected classes.	Added narrative and maps	pp. 4-29 to 4-30 and summary on pp. 4-33 to 4-37
Chapter 4 AFFH	Access to Opportunity	10	The element should describe and analyze the access to transit throughout the City and for protected classes.	Added narrative and maps	pp. 4-30 to 4-32 and summary on pp. 4-33 to 4-37
Chapter 4 AFFH	Disproportionate Housing Needs	11	The element must analyze the areas of poor environmental outcomes and identify actions to address fair housing issues.	Added narrative and maps	pp. 4-32 to 4-35
Chapter 4 AFFH	Disproportionate Housing Needs	12	Describe any geographic concentration of cost burden, overcrowding by tenure, and substandard housing.	Added narrative and maps	pp. 4-39 to 4-46
Chapter 4 AFFH	Disproportionate Housing Needs	13	Describe and analyze areas sensitive to displacement, including displacement risk due to disaster.	Added narrative and maps	pp. 4-43 to 4-46
Chapter 4 AFFH	Site Inventory Analysis	14	The element must identify whether sites improve or exacerbate fair housing issues in the City. 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).	New subsections titled "Site Inventory Analysis Findings" were added to each section that addresses this question for race, income, disability, familial status, all fh factors related to access to opportunity and all fh factors related to disproportionate housing needs. New program actions were added and included in FHAP as well as in chapter 7 on policies and programs.	Throughout chapter 4, FHAP
Chapter 4 AFFH	Site Inventory Analysis	15	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	New subsections titled "Site Inventory Analysis Findings" was added to each section and	Throughout chapter 4

			assessment of fair housing (e.g., segregation and integration, access to opportunity).	provides this information in both narrative and table format.	
Chapter 4 AFFH	Fair Housing Action Plan (Goals, Actions, Metrics, Milestones)	16	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.	New program actions were added where needed and programs were edited to provide milestones, metrics	New AFFH Programs included which respond directly to AFFH analysis are: 5-E, 5-F, 5-I, 5-J, 5-L, 5-N, 5-O, 5-P, 5-U, 5-V, and 5-W
Chapter 2 Needs Analysis	Housing Stock Condition	17	Estimate of the number of units in need of rehabilitation and replacement (possible sources are: recent windshield survey, estimates from the code enforcement agency, or information from knowledgeable builders/developers, including non-profit housing developers or organizations).	analysis added	page 2-36
Chapter 2 Needs Analysis	Housing Costs	18	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., local knowledge).	Additional rental data added	page 2-24
Chapter 2 Needs Analysis	Persons with Disabilities	19*	While the element quantifies the number of persons with disabilities, it must also analyze their special housing needs. For a complete analysis, the element should discuss challenges faced by the population, the existing resources to meet those needs, an assessment of any gaps in resources, and proposed policies, programs, and funding to help address those gaps.	Analysis added for disability housing needs.	pages 2-40, 2-41
Chapter 6 Sites Inventory	Progress Meeting RHNA	20	The City'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.	10 dwellings have been constructed in the city since July 1, 2022. Paragraph added.	page 6-7

Chapter 6 Sites Inventory	Sites Inventory	21	The element must list sites by parcel number, parcel size, zoning, general plan designation, describing existing uses for nonvacant sites and include a calculation of the realistic capacity of each site. While the element includes most of these requirements, the inventory must include the calculation of units in whole number increments. In addition, sites that are identified for rezone must include existing and proposed general plan and zoning designations. The element must also ensure there are sufficient sites identified in the inventory, either with existing zoning or proposed rezones to meet the lower and moderate income RHNA.	See Table 6-4	pages 6-13 to 6-15
Chapter 6 Sites Inventory	Realistic Capacity	22	While the element provides assumptions of buildout for sites included in the inventory, it must also provide support for these assumptions (e.g., recent project examples). For example, the element should demonstrate what specific trends, factors, and other evidence led to the assumptions.	Most density assumptions are based on actual projects or projects submitted nearby for similiary situated sites.	page 6-16 and table 6-6
Chapter 6 Sites Inventory	Realistic Capacity	23	The estimate of the number of units for each site must be adjusted as necessary, based on the land use controls and site improvements and typical densities of existing or approved residential developments at a similar affordability level.	None of the unit estimates have been adjusted but more justification has been provided. Some of the estimates are based on submitted projects.	see Tables 6-5 and 6-6
Chapter 6 Sites Inventory	Realistic Capacity	24	The element should describe what factors were included in the realistic capacity assumptions, especially in the mixed-use zones.	Additional justification added	See table 6-6
Chapter 6 Sites Inventory	Realistic Capacity	25	The element includes many sites in the transit-oriented development (TOD) which does not include a maximum density. Assumptions of realistic capacity should be supported with examples.	The following project examples were added to support assumptions: 111 San Bruno, Mills Park, and 732 - 740 ECR.	see page 6-16
Chapter 6 Sites Inventory	Realistic Capacity	26	Some sites in the inventory assume over 200 units an acre (including site 1 on page 6-13). These assumptions should be supported with examples. Examples to support realistic capacity assumptions should also include affordability levels, and percent of maximum densities.	Site #1 is the densest site in the inventory. No assumptions were made for this site because it is based on a submitted application. Staff noted projects with submitted applications are denser than staff previously anticipated. The density assumptions for sites without submitted applications was based on the project details of similar sites nearby. More information has	Table 6-6

				been added to the justification to make this connection more explicit.	
Chapter 6 Sites Inventory	Realistic Capacity	27	The calculation of residential capacity must also account for 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. For example, the element could analyze all development activity in these nonresidential zones, how often residential development occurs and adjust residential capacity calculations, policies, and programs accordingly.	Discussion added.	Page 6-11
Chapter 6 Sites Inventory	Zoning for Lower-Income Households	28	The element must demonstrate zoning appropriate to accommodate housing for lower-income households. For sites with zoning meeting specified densities or default densities (30 units per acre in San Bruno), no analysis is required. Otherwise, the element must include analysis based on statutory factors. While the element identifies densities of at least 30 units per acre for many of the sites to accommodate housing for lower-income households, other sites do not meet the default density. As a result, if relying on densities less than 30 units per acre to accommodate the lower-income RHNA, an analysis must be included to demonstrate how the zoning encourages the development of units affordable for lower income households. Please see HCD's Building Blocks for more information.	The city imposes a 15% affordable housing requirement on all residential developments of 5+ units. This requirement applies to sites that don't meet the default density requirement.	Page 6-10
Chapter 6 Sites Inventory	Small and Large Sites	29	Sites smaller than half an acre or greater than ten acres are deemed inadequate to accommodate housing for lower-income households unless it is demonstrated, with sufficient evidence, 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 housing for lower-income households. (Gov. Code, § 65583.2, subd. (c)(2)(A).) Based on the outcomes of the analysis, the element should add or modify programs.	The city imposes a 15% affordable housing requirement on all residential developments of 5+ units. This requirement applies to sites that don't meet the default density requirement.	Page 6-10

Chapter 6 Sites Inventory	Suitability of Nonvacant Sites	30	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 former schools, and a gas station; 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 City 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.	Additional information has been added to Chapter 6.	Table 6-6
Chapter 6 Sites Inventory	Suitability of Nonvacant Sites	31	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 regional housing need allocation.	City needs to adopt a resolution	Finding included in resolution
Chapter 6 Sites Inventory	Tanforan Site	32	The element should describe feasibility and timing of development during the planning period and add or modify programs as appropriate. The element mentions an agreement with the developer for a minimum of 1,000 units but it should describe timing, whether a specific plan is needed, and affordability assumptions on the site. The element should also address any known constraints to development (e.g., airport compatibility) and modify programs to ensure the availability of the site or identify alternative sites.	Added to table 6-6	see page 6-24

Chapter 6 Sites Inventory	Sites Identified in Multiple Planning Periods	33	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. If utilizing sites outside of the Transit Corridors Specific Plan for the lower-income RHNA, the element should clarify if sites were identified in prior planning periods and if so, which sites and include a program. 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.	Identified sites that require from previous HE cycles in Table 6-4	see pages 6-13 - 6-15
Chapter 6 Sites Inventory	Accessory Dwelling Units (ADU)	34	The element projects 345 ADUs over the planning period or approximately 43 ADUs per year over the eight-year planning period. These trends are inconsistent with HCD records (6 reported in 2018, 17 in 2019, 7 in 2020, and 70 in 2021) and do not support an assumption of 43 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 (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.	Estimated ADU production has been revised to be consistent with HCDs feedback. <u>Monitoring program added.</u>	page 6-22
Chapter 6 Sites Inventory	AB 725	35	For jurisdictions that are considered Metropolitan, the element must identify at least 25 percent of the remaining moderate and above moderate RHNA on sites that allow at least four units of housing (e.g., four plex or greater). (Gov. Code, § 65583.2, subd. (c)(4).)	Of the 23 sites in the inventory, only the two San Marco sites allow less than four units of housing.	
Chapter 6 Sites Inventory	Quantified Objectives	36	The element generally did not address this requirement. The element must include quantified objectives for construction, rehabilitation, and conservation by income group, including extremely low-income households. Please see the Building Blocks for additional information.	Quantified objectives section added.	page 6-24

Chapter 3 Housing Constraints & Resources	Infrastructure	37	While the element includes a general discussion on water and sewer capacity, it must demonstrate sufficient existing or planned water and sewer capacity to accommodate the RHNA for the planning period and add or modify programs if necessary.	Mostly addressed in chapter 3 but also mentioned in chapter 6.	
Chapter 3 Housing Constraints & Resources	Environmental Constraints	38	While the element generally describes a few environmental conditions within the City, it must describe any other known environmental constraints or conditions within the City that could impact housing development in the planning period.	This section covered flooding, geology (earthquakes), noise, and air quality. Hazardous materials has been added to the discussion.	page 3-32
Chapter 3 Housing Constraints & Resources	Zoning for a Variety of Housing Types- Emergency Shelters	39	The element should describe the development standards of the M-1 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	Emergency Shelters: Allow sufficient parking to accommodate all staff working in the emergency shelter, provided that the standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone, in compliance with Government Code Section 65583(a)(4)(A)(ii). Adopt development standards for emergency shelters and ensure they are consistent with State law per California Government Code Section 65583(a)(4)(A)(ii).	
Chapter 3 Housing Constraints & Resources	Zoning for a Variety of Housing Types- Transitional Supportive Housing	40	Transitional housing and supportive housing must be permitted as a residential use in all zones allowing residential uses and only subject to those restrictions that apply to other residential dwellings of the same type in the same zone. (Gov. Code, § 65583, subd. (c)(3).) The element must describe and analyze the City's transitional and supportive housing standards and codes and demonstrate consistency with Section 65583(c)(3) or add or revise programs to comply with the statutory requirements.	Pursuant to Government Code Section 65583, transitional and supportive housing types are required to be treated as residential uses and subject only to those restrictions that apply to other residential uses of the same type in the same zone. The Zoning Ordinance allows supportive and transitional housing in all residential districts and in all zones that allow multifamily and mixed use development including nonresidential zones, per	

				Government Code Sections 65583 and 65650. Program 21 include actions to comply with State Law regarding transitional and supportive housing types.	
Chapter 3 Housing Constraints & Resources	Zoning for a Variety of Housing Types- By-Right Permanent Supportive Housing	41	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.	These uses are defined as residential care facilities and are permitted in all zoning districts where housing is permitted.	page 3-13
Chapter 3 Housing Constraints & Resources	Zoning for a Variety of Housing Types- Low Barrier Navigation Centers	42	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.	Discussion added.	page 3-16
Chapter 3 Housing Constraints & Resources	Zoning for a Variety of Housing Types- Single Room Occupancy (SRO) Units	43	Single Room Occupancy (SRO) Units: The element must describe where SROs are allowed or add a program as appropriate.	Program added to allow SROs	page 3-17
Chapter 3 Housing Constraints & Resources	Zoning for a Variety of Housing Types- Employee Housing	44	The element must demonstrate the City's zoning is consistent with the Employee Housing Act (Health and Safety Code, § 17000 et seq.), specifically, sections 17021.5 and, if necessary, add or modify programs. Section 17021.5 requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone.	Employee Housing Consistent with Health and Safety Code Sections 17021.5 and 17021.6, employee housing is permitted by right in every residential zone, including single family zones. Additionally, in 2012, the City	page 3-17

				amended its Zoning Code definitions to define “family” to include employee housing.	
Chapter 3 Housing Constraints & Resources	Zoning for a Variety of Housing Types- Accessory Dwelling Units	45	While the City does have an ADU ordinance, it is currently under review by HCD for consistency with State ADU Law. HCD will provide communication of ADU compliance issues under a separate cover. If necessary, the element should add a program to update the City’s ADU ordinance to comply with state law.	City’s ADU ordinance has been forwarded to HCD for review.	
Chapter 3 Housing Constraints & Resources	Land Use Controls	46	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. The element should analyze the interaction of the General Plan designation for high density residential allowing 24-40 dwelling units an acre, but the R-4 zoning district limits densities to 30 dwelling units an acre and whether the maximum density in the R-4 is a constraint. In addition, the element must analyze whether the garage setbacks apply to multifamily developments and whether they are a constraint on housing. On page 3-6, the element lists parking requirements for “general residential”; it should also clarify whether parking requirements for mixed-use zones differ than the general residential parking requirements and add a program as appropriate. Lastly, the element states that the full build-out of the sites located in the TCP would exceed the maximum of 1,610 units allowed under the current Environmental Impact Report (EIR). The element must analyze whether exceeding the allowed units is a constraint and either adjust capacity assumptions or add programs as appropriate.	Discussion added.	Page 3-16 See Program 1-I
Chapter 3 Housing Constraints & Resources	Fees and Exaction	47	While the element describes many fees and the typical deposit range, it must describe all required fees for single family and multifamily housing development, including all impact and regional fees, and analyze their impact as potential constraints on housing supply and affordability. In addition, the analysis should identify the total amount	Table 3-10 includes all required fees for SFD and MFD project types. A separate section on Impact Fees has been added but	page 3-24

			of fees and their proportion to the development costs for both single family and multifamily housing.	these fees are included in the amounts shown in the table.	
Chapter 3 Housing Constraints & Resources	Local Processing and Permit Procedures	48	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.	Section added.	page 3-9
Chapter 3 Housing Constraints & Resources	Design Review	49	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 it must include a program to address this permitting requirement, as appropriate.	Discussion added.	page 3-16 See Program 1-I
Chapter 3 Housing Constraints & Resources	State Density Bonus Law	50	The City's current density bonus ordinance should be reviewed for compliance with current state density bonus law and programs should be added as necessary. (Gov. Code, § 65915.)	The city's density bonus ord. was updated in 2021 and is consistent with state law. Density bonus section discussion has been added.	page 3-19
Chapter 3 Housing Constraints & Resources	Streamlining Provisions	51	While the element states that they followed SB 35 procedures for a prior project, it should clarify whether the City has procedures in place consistent with streamlining procedures pursuant to Government Code section 65913.4 and include programs as appropriate.	The City will comply with SB 35 (Gov. Code Section 65913.4) by maintaining a written policy and procedure, as well as other guidance as appropriate, to streamline the approval process and standards for eligible projects. A program has been added to complete this work within one year of HE adoption.	page 3-19

Chapter 3 Housing Constraints & Resources	On/Off-Site Improvements	52	The element must identify typical subdivision level improvement requirements, such as minimum street widths (e.g., 40-foot minimum street width), and analyze their impact as potential constraints on housing supply and affordability.	Subdivision improvements included with off-site improvements.	page 3-20
Chapter 3 Housing Constraints & Resources	Constraints on Housing for Persons with Disabilities	53	The element identifies approval findings for granting a reasonable accommodation including finding related to impacts on surrounding uses – essentially a conditional use permit finding. However, reasonable accommodation should be a unique exception process from a conditional use permit, especially given its importance in addressing barriers to housing for persons with disabilities. The element should include a program to amend the Reasonable Accommodation Ordinance and remove constraints, including but not limited to the “potential impact on surrounding uses” approval finding. In addition, while the element states that unlicensed residential care facilities must require a license from the state licensing agency before operation, zoning and standards should simply implement a barrier-free definition of family instead of subjecting, potentially persons with disabilities, to special regulations. Zoning code regulations that isolate and regulate various types of housing for persons with disabilities may pose a constraint on housing choice for persons with disabilities. The element should include specific analysis of these and any other constraints for impacts on housing for persons with disabilities and add or modify programs as appropriate. Lastly, 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.	A program to update the city's reasonable accommodation findings was added to Chapter 7.	See program 4-D on page 7-23.
Chapter 3 Housing Constraints & Resources	Availability of Financing	54	The element must describe the availability of financing, including private financing and government assistance programs, is generally available in the community.	Homeownership financing and affordable housing financing added.	pages 3-27, 3-28
Chapter 3 Housing Constraints & Resources	Developed Densities and Permit Times	55	The element must be revised to include analysis of requests to develop housing at densities below those anticipated, 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.	Permitting times and Development density sections added	pages 3-7, 3-24 - 3-25

Chapter 7 Programs	Program 1-E & 1-F	56	Programs 1-E (Publicly Post Status Updates) and 1-F (Consolidate Fee Schedules): These programs should clarify how often the listings will be updated.	Programs updated.	pp. 7-4 ; same program label
Chapter 7 Programs	Programs 2-A, 2-E, 3-B, 4-A, 4-E, 5-B, 8-A	57	Program 2-A (Study the South El Camino Real Corridor), 2-E (SB 9 Implementation Guidelines), 3-B (Displaced Residents), 4-A (Reasonable Accommodations), 4-E (Home Sharing Opportunities), 5-B (Affordable Housing Fund Resources), 8-A (Create an Affirmative Marketing Strategy): These programs should include proactive outreach and specify how often it will occur throughout the planning period.	All programs have been updated to include outreach component and frequency. Some of the goals and programs were reorganized, the new program reference numbers are listed in the following column.	Former 2-A was incorporated into an action item in former 2-B and 2-B was relabeled as 2-A. Former 3B is New 4-G; Former 4-A is an action item in the New 4-C; Former 4-E is New 4-M; Former 5-B is New 3-B; Former 8-A is an action item under New 4-A
Chapter 7 Programs	Program 2-B	58	Program 2-B (Evaluate Ballot Initiative): This program should include public outreach. In addition, the program must be implemented earlier in the planning period to ensure beneficial impact and include specific commitment to the action.	Included outreach component and reduced timeframe for implementation by half. This program was expanded to include six specific actions and it was also combined with Program 2A (Study the El Camino Corridor) which was closely related.	pp. 7-6; program 2-A and 2-B combined into current program 2-A
Chapter 7 Programs	Program 2-C	59	Program 2-C (Support Development of Housing Opportunity Sites): This program should clarify how often outreach will occur and whether incentives will be provided.	Outreach information and incentive information included.	pp. 7-6; program is now 2-B
Chapter 7 Programs	Program 2-G	60	Program 2-G (Publicize Affordable Housing Financing Strategies): The program should clarify how often outreach will occur and sources will be updated.	Programs updated with frequency information.	pp.7-8; program is now 2-F
Chapter 7 Programs	Program 4-B	61	Program 4-B (Fair Housing Training for Landlords and Tenants): This program should commit to additional trainings during the planning period.	Program updated to minimum of one training per year.	pp. 22 Same program label

Chapter 7 Programs	Program 4-C	62	Program 4-C (Publicize Affordable Housing Financing Strategies): The program should clarify how often outreach and coordination will occur. In addition, it should include timing of when the in-lieu fee strategy will be developed.	Programs updated with frequency information and timing for in lieu fee strategy.	Former 4-B is New 2-F
Chapter 7 Programs	Program 4-D	63	Program 4-D (Nexus Study for Affordable Housing Program): The program should include an action and timing to implement the results of the study.	Added implementation action item and timeframe for implementation	Former 4-D is New 2-I; the language in 2-I was edited and includes former 4-D
Chapter 7 Programs	Program 4-G	64	Program 4-G (Affordable Unit Set-Aside): The program should include implementation beyond research as well as include proactive outreach.	Implementation, outreach, and timeframes have been added.	Former 4-G is New 4-O
Chapter 7 Programs	Program 4-I	65	Program 4-I (Increase Supply of Housing for Large Families): The program should clarify what actions will be taken to encourage large units, such as incentives. The element should also include outreach to developers	This program was added into new program 2-F on providing housing for residents with disproportionate housing needs and ELIs. Outreach info added. Some options for incentives were added but will be further considered.	Former 4-I is New Action Item under 2-F.
Chapter 7 Programs	Program 5-C	66	Program 5-C (Revise Affordable Housing Ordinance): The program should include back-up actions if the existing action is deemed infeasible.	Back up action and timing included.	Former 5-C is New 3-C
Chapter 7 Programs	Program 5-D	67	Program 5-D (Retain Public Land): This program should clarify what is being implemented and include timing.	Program clarified and timing included.	Former 5-D is New 3-D
Chapter 7 Programs	Program 5-E	68	Program 5-E (Expedite Review of 100% Affordable Housing Projects): The program should clarify what the timing is tied to if the program is continuing.	Revised program, this is a continuing program.	Former 5-E is incorporated into 1-C. Former 5-E and 1-C were similar programs. This is also an action item under 2-G (Encourage production of ELIs)
Chapter 7 Programs	Program 6-A	69	Program 6-A (Replacement of Below Market Rate Units): The timing of this program should be earlier in the planning period to ensure beneficial impact.	Timing updated from three years to one and a half years from certification.	Former 6-A is New 3-G

Chapter 7 Programs	Program 8-B	70	Program 8-B (Partner with Local Fair Housing Organizations): The program should include timing of how often training will occur.	Added timing of at least annually.	Former 8-B is New 4-B
Chapter 7 Programs	Program 2-F (Require a minimum of 1,000 Housing Units on Tanforan Mall Project):	71	This program should clarify whether incentives will be provided for affordable units, what actions will be implemented to ensure a set aside for persons with disabilities, how often outreach will occur, and clarify what will be implemented within the identified timeframe.	Information was added. See note.	pp. 7-8; see programs 2-F and 4-O
Chapter 7 Programs	Program 2-H (Release RFP for City-Owned Sites)	72	The element identified City-owned sites to accommodate a portion of the RHNA. The element should include a program with numerical objectives that ensures compliance with the Surplus Land Act, provides incentives and actions along with a schedule to facilitate development of City-owned sites. Actions should include outreach with developers, issuing requests for proposals, incentives, fee waivers, priority processing and financial assistance. In addition, a similar program should be added for school owned sites.	Expanded this program to include these items as a part of the housing development feasibility study. No program was added for school owned sites specifically because these sites have already completed the disposition process and have submitted development applications to the city.	Program 2-I
Chapter 7 Programs	ADD NEW PROGRAM	73	The element must include a program(s) with specific actions and timelines to assist in the development of housing for extremely low-income households. The program(s) could commit the City to adopting priority processing, granting fee waivers or deferrals, modifying development standards, granting concessions and incentives for housing developments that include units affordable to extremely low-income households; assisting, supporting or pursuing funding applications; and outreach and coordination with affordable housing developers.	Two new programs added.	Program 2-G and Program 2-H
Chapter 7 Programs	ADD NEW PROGRAM	74	The element must also include a program(s) to assist in the development of housing for all special needs households (e.g., elderly, homeless, farmworkers, persons with disabilities, female-headed households). Program actions could include proactive outreach and assistance to non-profit service providers and developers, prioritizing some funding for housing developments affordable to special needs households and offering financial incentives or regulatory concessions to encourage a variety of housing types.	New program added.	Program 2-F

Chapter 7 Programs	Programs 2-A and 2-B HEIGHTS	75	Heights: Programs to address restrictions on heights (Programs 2-A and 2-B) should specifically commit to take an initiative to the ballot by a specified date and complete alternative actions by a specific date if the ballot initiative is not passed.	Program expanded with additional detail. No backup plan needed because these units are not needed to meet our RHNA.	Program 1-L
Chapter 7 Programs	Short Term Rentals	76	Short Term Rentals: As noted in the element, a program should be added or modified to conduct research and take action as appropriate by a specified date.	New program added.	Program 1-H
Chapter 7 Programs	ADD NEW PROGRAM	77	The element must include a program(s) to conserve and improve the condition of the existing stock, which may include addressing the loss of dwelling units. A program could provide grants for substantial rehabilitation, provide matching grants for homeowner improvements, or implement proactive code enforcement program.	Added program.	Program 3-E
Chapter 7 Programs	Program 4-H (Promote Accessory Dwelling Unit Ordinance):	78	The program should include proactive outreach throughout the planning period. In addition, the program should include incentives beyond the City's ordinance and webpage and commit to monitor permitted ADUs and affordability every other year and take appropriate action such as adjusting assumptions or rezoning within a specified time (e.g., 6 months) if assumptions are not realized.	This is program 4-P- revised to incorporate comments.	Former Program 4-H is new Program 4-P. Program was revised.
Chapter 7 Programs	General Comment	79	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 City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types.	Site analysis completed. New programs added.	New program 2-A (former 2-A and 2-B) was revised with new action items. New programs 2-G, 2-H, 2-I and 2-K.

Chapter 7 Programs	Shortfall of Adequate Sites	80	If the element does not identify adequate sites to accommodate the regional housing need for lower-income households, it must include a program(s) to identify sites with appropriate zoning to accommodate the regional housing need within the planning period. The program should identify the shortfall by income group, acreage, allowable densities, appropriate development standards and meet all by right requirements pursuant to Government Code section 65583.2, subdivisions (h) and (i), including but not limited to permitting multifamily uses by-right for developments in which 20 percent or more of the units are affordable to lower income households.	Draft Element submitted to HCD identified adequate sites to accommodate the regional housing need for lower income households.	No additional program required.
Chapter 7 Programs	General Comment	81	As noted in Findings B4 and B5, the element requires a complete analysis of potential governmental and non-governmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.	Analysis completed and new programs added.	New programs added 1-H, 3-E, 3-G and 3-H.
Chapter 7 Programs	General Comment	82	As noted in Finding B1, the element must include a complete analysis of Affirmatively Furthering Fair Housing (AFFH). The element must be revised to add 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.	Analysis completed and new programs added.	New AFFH Programs added 4-E, 4-H, 4-I, 4-K, 4-O, 4-L, 4-Q, 4-R, and 4-S.
Chapter 5 Public Participation	Translation Services	83	While the element includes a summary of participation including outreach to the community, it must also describe whether translation services were available during public participation including, but not limited to, public workshops, Planning Commission, and City Council meetings.	Materials that were distributed were translated into Spanish and the city website uses a translation plug-in for translating content. Translation services were available at 21 Elements meetings but only available at local meetings upon prior request.	

Chapter 1 Introduction	Consistency with the General Plan	84	While the element discusses how internal consistency will be achieved with other elements of the general plan as part of the housing element update, it should also discuss how internal consistency will be maintained throughout the planning period.	General Plan language added.	page 1-5
-----------------------------------	--	-----------	---	------------------------------	----------

Exhibit D

GENERAL PLAN AMENDMENT TO POLICY HS-40

General Plan Policy	Existing Policy Language	Proposed Policy Amendment
HS-40	Prohibit new residential development within the 70+ Airport CNEL areas, as dictated by Airport Land Use Commission infill criteria.	Prohibit new residential development within the 70+ Airport CNEL areas, as dictated by Airport land Use Commission infill criteria, <u>unless, on a project by project basis, a proposed residential development is approved through the Local Agency Override process consistent with the Public Utilities Code Section 21675.1(d).</u>

Exhibit E

**CALIFORNIA DEPARTMENT OF HOUSING AND
COMMUNITY DEVELOPMENT (HCD)
REVIEW COMMENTS ON
SAN BRUNO'S 2023-2031 DRAFT HOUSING ELEMENT
UPDATE SUBMITTED JULY 2022**

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

2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov



October 6, 2022

Darcy Smith, Interim Director
Community & Economic Development Department
City of San Bruno
567 El Camino Real
San Bruno, CA 94066

Dear Darcy Smith:

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

Thank you for submitting the City of San Bruno's (City) draft housing element received for review on July 8, 2022, along with revisions received on October 3, 2022. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review. Our review was facilitated by a conversation on September 16, 2022 with yourself, Michael Laughlin, Michael Smith, Kristie Woo, and consultant Sabina Mora. In addition, HCD considered comments from San Francisco International Airport, Housing Leadership Council of San Mateo County, and YIMBY Law and Greenbelt Alliance 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.

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 accommodate the regional housing needs allocation (RHNA), including for lower-income households, shall be completed no later than one year from the statutory deadline. 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 City fails to adopt a compliant housing element within one year from the statutory deadline, the element cannot be found in substantial compliance until rezones to accommodate a shortfall of sites pursuant to Government Code section 65583, subdivision (c) (1) and Government Code section 65583.2, subdivision (c) 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 City 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 City 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 City 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 appreciates the hard work and cooperation the housing element update team provided during the review. We are committed to assisting the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Hillary Prasad, of our staff, at Hillary.Prasad@hcd.ca.gov.

Sincerely,



Paul McDougall
Senior Program Manager

Enclosure

APPENDIX CITY OF SAN BRUNO

The following changes are necessary to bring the City'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/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/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).)

The review requirement is one of the most important features of the element update. The review of past programs should analyze the City's accomplishments over the previous planning period. This information provides the basis for developing a more effective housing program.

A thorough program-by-program review is necessary to evaluate City's performance in addressing housing goals. While the element includes progress and actual results of implementation of some programs, this analysis must be included for all programs. In addition, the element must provide a description of how the objectives and programs of the updated element incorporate changes resulting from the evaluation.

If the City failed to make adequate sites available to accommodate the regional housing need in the prior planning period, the City must zone or rezone sites to accommodate any unaccommodated need within the first year of the 2023-2031 planning period. (Gov. Code, § 65584.09.) Program 2-A was necessary to demonstrate compliance with the adequate sites requirement in the previous planning period, however it was not completed. To demonstrate adequate sites were made available in the prior planning period, the element must include an analysis or programs demonstrating compliance with the statutory requirements. For additional information, see HCD's AB 1233 Memorandum at <https://www.hcd.ca.gov/hcd-memos> and the Building Blocks at <https://www.hcd.ca.gov/review-and-revise>.

As part of the review of programs in the past cycle, the element must evaluate the effectiveness of 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).

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).)*

Integration and Segregation: The element reports some data regarding segregation and integration of race, disability, familial status, and income. The element must evaluate racial patterns at a regional basis, comparing the City to the region. In addition, the element must discuss and analyze data on persons with disabilities for trends over time and patterns across census tracts as well as evaluate patterns at a regional basis. Lastly, the element must describe and analyze concentrations of income and familial status geographically throughout the City.

Disparities in Access to Opportunity: While the element identified an area of access to education with lower outcomes, it must describe and analyze how that affects fair housing and other factors. In addition, the element should describe and analyze the access to jobs and transit throughout the City and for protected classes. The element must also analyze the areas of poor environmental outcomes and identify actions to address fair housing issues.

Disproportionate Housing Needs Including Displacement: While the element reports some data on disproportionate needs, it should describe any geographic concentration of cost burden and overcrowding by tenure, as well as any concentrations of substandard housing. The element must also describe and analyze areas sensitive to displacement, including displacement risk due to disaster (e.g., earthquake, fire, and flood).

Sites Inventory: 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 City. 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).

Goals, Actions, Metrics, and Milestones: 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.

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: The element 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 non-profit 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., local knowledge).

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 Regional Housing Need Allocation (RHNA): The City'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.

Sites Inventory: The element must list sites by parcel number, parcel size, zoning, general plan designation, describing existing uses for nonvacant sites and include a calculation of the realistic capacity of each site. While the element includes most of these requirements, the inventory must include the calculation of units in whole number increments. In addition, sites that are identified for rezone must include existing and proposed general plan and zoning designations. The element must also ensure there are sufficient sites identified in the inventory, either with existing zoning or proposed rezones to meet the lower and moderate income RHNA.

Realistic Capacity: While the element provides assumptions of buildout for sites included in the inventory, it must also provide support for these assumptions (e.g., recent project examples). For example, 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 and typical densities of existing or approved residential developments at a similar affordability level. In addition, the element should describe what factors were included in the realistic capacity assumptions, especially in the mixed-use zones. Currently, the element includes many sites in the transit-oriented development (TOD) which does not include a maximum density. Assumptions of realistic capacity should be supported with examples. Further, some sites in the inventory assume over 200 units an acre (including site 1 on page 6-13). These

assumptions should be supported with examples. Examples to support realistic capacity assumptions should also include affordability levels, and percent of maximum densities.

Finally, the calculation of residential capacity must also account for 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. For example, the element could analyze all development activity in these nonresidential zones, how often residential development occurs and adjust residential capacity calculations, policies, and programs accordingly.

Zoning for Lower-Income Households: The element must demonstrate zoning appropriate to accommodate housing for lower-income households. For sites with zoning meeting specified densities or default densities (30 units per acre in San Bruno), no analysis is required. Otherwise, the element must include analysis based on statutory factors. While the element identifies densities of at least 30 units per acre for many of the sites to accommodate housing for lower-income households, other sites do not meet the default density. As a result, if relying on densities less than 30 units per acre to accommodate the lower-income RHNA, an analysis must be included to demonstrate how the zoning encourages the development of units affordable for lower-income households. Please see HCD's Building Blocks for more information.

Small and Large Sites: Sites smaller than half an acre or greater than ten acres are deemed inadequate to accommodate housing for lower-income households unless it is demonstrated, with sufficient evidence, 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 housing for lower-income households. (Gov. Code, § 65583.2, subd. (c)(2)(A).) Based on the outcomes of the analysis, the element should add or modify 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 former schools, and a gas station; 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 City 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 regional housing need allocation.

Tanforan Site: While the element includes some information on this site, it should describe feasibility and timing of development during the planning period and add or modify programs as appropriate. The element mentions an agreement with the developer for a minimum of 1,000 units but it should describe timing, whether a specific plan is needed, and affordability assumptions on the site. The element should also address any known constraints to development (e.g., airport compatibility) and modify programs to ensure the availability of the site or identify alternative sites.

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. If utilizing sites outside of the Transit Corridors Specific Plan for the lower-income RHNA, the element should clarify if sites were identified in prior planning periods and if so, which sites and include a program. 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.

Accessory Dwelling Units (ADU): The element projects 345 ADUs over the planning period or approximately 43 ADUs per year over the eight-year planning period. These trends are inconsistent with HCD records (6 reported in 2018, 17 in 2019, 7 in 2020, and 70 in 2021) and do not support an assumption of 43 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 (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.

AB 725: For jurisdictions that are considered Metropolitan, the element must identify at least 25 percent of the remaining moderate and above moderate RHNA on sites that allow at least four units of housing (e.g., four plex or greater). (Gov. Code, § 65583.2, subd. (c)(4).)

Infrastructure: While the element includes a general discussion on water and sewer capacity, it must demonstrate sufficient existing or planned water and sewer capacity to

accommodate the RHNA for the planning period and add or modify programs if necessary.

Environmental Constraints: While the element generally describes a few environmental conditions within the City, it must describe any other known environmental constraints or conditions within the City that could impact housing development in the planning period.

Zoning for a Variety of Housing Types:

- *Emergency Shelters:* The element should describe the development standards of the M-1 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.
- *Transitional and Supportive Housing:* Transitional housing and supportive housing must be permitted as a residential use in all zones allowing residential uses and only subject to those restrictions that apply to other residential dwellings of the same type in the same zone. (Gov. Code, § 65583, subd. (c)(3).) The element must describe and analyze the City's transitional and supportive housing standards and codes and demonstrate consistency with Section 65583(c)(3) or add or revise programs to comply with the statutory requirements.
- *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 must describe where SROs are allowed or add a program as appropriate.
- *Employee Housing:* The element must demonstrate the City's zoning is consistent with the Employee Housing Act (Health and Safety Code, § 17000 et seq.), specifically, sections 17021.5 and, if necessary, add or modify programs. Section 17021.5 requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone.
- *Accessory Dwelling Units:* While the City does have an ADU ordinance, it is currently under review by HCD for consistency with State ADU Law. HCD will provide communication of ADU compliance issues under a separate cover. If

necessary, the element should add a program to update the City's ADU ordinance to comply with state law.

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. The element should analyze the interaction of the General Plan designation for high density residential allowing 24-40 dwelling units an acre, but the R-4 zoning district limits densities to 30 dwelling units an acre and whether the maximum density in the R-4 is a constraint. In addition, the element must analyze whether the garage setbacks apply to multifamily developments and whether they are a constraint on housing. On page 3-6, the element lists parking requirements for "general residential"; it should also clarify whether parking requirements for mixed-use zones differ than the general residential parking requirements and add a program as appropriate. Lastly, the element states that the full build-out of the sites located in the TCP would exceed the maximum of 1,610 units allowed under the current Environmental Impact Report (EIR). The element must analyze whether exceeding the allowed units is a constraint and either adjust capacity assumptions or add programs as appropriate.

Fees and Exaction: While the element describes many fees and the typical deposit range, it must describe all required fees for single family and multifamily housing development, including all impact and regional fees, and analyze their impact as potential constraints on housing supply and affordability. In addition, the analysis should identify the total amount of fees and their proportion to the development costs for both single family and multifamily housing.

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.

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 it must include a program to address this permitting requirement, as appropriate.

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

Streamlining Provisions: While the element states that they followed SB 35 procedures for a prior project, it should clarify whether the City has procedures in place consistent with streamlining procedures pursuant to Government Code section 65913.4 and include programs as appropriate.

On/Off-Site Improvements: The element must identify typical subdivision level improvement requirements, such as minimum street widths (e.g., 40-foot minimum street width), and analyze their impact as potential constraints on housing supply and affordability.

Constraints on Housing for Persons with Disabilities: The element identifies approval findings for granting a reasonable accommodation including finding related to impacts on surrounding uses – essentially a conditional use permit finding. However, reasonable accommodation should be a unique exception process from a conditional use permit, especially given its importance in addressing barriers to housing for persons with disabilities. The element should include a program to amend the Reasonable Accommodation Ordinance and remove constraints, including but not limited to the “potential impact on surrounding uses” approval finding. In addition, while the element states that unlicensed residential care facilities must require a license from the state licensing agency before operation, zoning and standards should simply implement a barrier-free definition of family instead of subjecting, potentially persons with disabilities, to special regulations. Zoning code regulations that isolate and regulate various types of housing for persons with disabilities may pose a constraint on housing choice for persons with disabilities. The element should include specific analysis of these and any other constraints for impacts on housing for persons with disabilities and add or modify programs as appropriate. Lastly, 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.

5. *An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, the cost of construction, the 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. The analysis shall also demonstrate local efforts to remove nongovernmental constraints that create a gap between the locality's planning for the development of housing for all income levels and the construction of that housing. (Gov. Code, § 65583, subd. (a)(6).)*

Availability of Financing: The element must describe the availability of financing, including private financing and government assistance programs, is generally available in the community.

Developed Densities and Permit Times: The element must be revised to include analysis of requests to develop housing at densities below those anticipated, 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.

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).)*

Persons with Disabilities: While the element quantifies the number of persons with disabilities, it must also analyze their special housing needs. For a complete analysis, the element should discuss challenges faced by the population, the existing resources to meet those needs, 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 have a beneficial impact in the planning period and achieve the goals and objectives of the housing element, programs should have specific commitment toward housing outcomes and discrete and early timing (e.g., at least annually or by a specified date). Many programs list timing as within one year of certification. The timing of these programs should be benchmarked to a known date (e.g., within one year of the planning period). In addition, examples of programs that should be revised include the following:

- *Programs 1-E (Publicly Post Status Updates) and 1-F (Consolidate Fee Schedules):* These programs should clarify how often the listings will be updated.
- *Program 2-A (Study the South El Camino Real Corridor), 2-E (SB 9 Implementation Guidelines), 3-B (Displaced Residents), 4-A (Reasonable Accommodations), 4-E (Home Sharing Opportunities), 5-B (Affordable Housing Fund Resources), 8-A (Create an Affirmative Marketing Strategy):* These programs should include proactive outreach and specify how often it will occur throughout the planning period.

- *Program 2-B (Evaluate Ballot Initiative)*: This program should include public outreach. In addition, the program must be implemented earlier in the planning period to ensure beneficial impact and include specific commitment to the action.
- *Program 2-C (Support Development of Housing Opportunity Sites)*: This program should clarify how often outreach will occur and whether incentives will be provided.
- *Program 2-G (Publicize Affordable Housing Financing Strategies)*: The program should clarify how often outreach will occur and sources will be updated.
- *Program 4-B (Fair Housing Training for Landlords and Tenants)*: This program should commit to additional trainings during the planning period.
- *Program 4-C (Publicize Affordable Housing Financing Strategies)*: The program should clarify how often outreach and coordination will occur. In addition, it should include timing of when the in-lieu fee strategy will be developed.
- *Program 4-D (Nexus Study for Affordable Housing Program)*: The program should include an action and timing to implement the results of the study.
- *Program 4-G (Affordable Unit Set-Aside)*: The program should include implementation beyond research as well as include proactive outreach.
- *Program 4-I (Increase Supply of Housing for Large Families)*: The program should clarify what actions will be taken to encourage large units, such as incentives. The element should also include outreach to developers.
- *Program 5-C (Revise Affordable Housing Ordinance)*: The program should include back-up actions if the existing action is deemed infeasible.
- *Program 5-D (Retain Public Land)*: This program should clarify what is being implemented and include timing.
- *Program 5-E (Expedite Review of 100% Affordable Housing Projects)*: The program should clarify what the timing is tied to if the program is continuing.
- *Program 6-A (Replacement of Below Market Rate Units)*: The timing of this program should be earlier in the planning period to ensure beneficial impact.
- *Program 8-B (Partner with Local Fair Housing Organizations)*: The program should include timing of how often training 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 City 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 should be revised as follows:

Program 2-F (Require a minimum of 1,000 Housing Units on Tanforan Mall Project):

This program should clarify whether incentives will be provided for affordable units, what actions will be implemented to ensure a set aside for persons with disabilities, how often outreach will occur, and clarify what will be implemented within the identified timeframe.

Shortfall of Adequate Sites: if the element does not identify adequate sites to accommodate the regional housing need for lower-income households, it must include a program(s) to identify sites with appropriate zoning to accommodate the regional housing need within the planning period. The program should identify the shortfall by income group, acreage, allowable densities, appropriate development standards and meet all by right requirements pursuant to Government Code section 65583.2, subdivisions (h) and (i), including but not limited to permitting multifamily uses by-right for developments in which 20 percent or more of the units are affordable to lower income households.

Program 2-H (Release RFP for City-Owned Sites): The element identified City-owned sites to accommodate a portion of the RHNA. The element should include a program with numerical objectives that ensures compliance with the Surplus Land Act, provides incentives and actions along with a schedule to facilitate development of City-owned sites. Actions should include outreach with developers, issuing requests for proposals, incentives, fee waivers, priority processing and financial assistance. In addition, a similar program should be added for school owned sites.

3. *The Housing Element shall contain programs which assist in the development of adequate housing to meet the needs of extremely low-, very low-, low- and moderate-income households. (Gov. Code, § 65583, subd. (c)(2).)*

The element must include a program(s) with specific actions and timelines to assist in the development of housing for extremely low-income households. The program(s) could commit the City to adopting priority processing, granting fee waivers or deferrals, modifying development standards, granting concessions and incentives for housing developments that include units affordable to extremely low-income households; assisting, supporting or pursuing funding applications; and outreach and coordination with affordable housing developers.

In addition, the element must also include a program(s) to assist in the development of housing for all special needs households (e.g., elderly, homeless, farmworkers, persons with disabilities, female-headed households). Program actions could include proactive outreach and assistance to non-profit service providers and developers, prioritizing some funding for housing developments affordable to special needs households and offering financial incentives or regulatory concessions to encourage a variety of housing types.

4. *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 non-governmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints. In addition, the element should be revised as follows:

Heights: Programs to address restrictions on heights (Programs 2-A and 2-B) should specifically commit to take an initiative to the ballot by a specified date and complete alternative actions by a specific date if the ballot initiative is not passed.

Short Term Rentals: As noted in the element, a program should be added or modified to conduct research and take action as appropriate by a specified date.

5. *The Housing Element shall include programs to conserve and improve the condition of the existing affordable housing stock. (Gov. Code, § 65583, subd. (c)(4).)*

The element must include a program(s) to conserve and improve the condition of the existing stock, which may include addressing the loss of dwelling units. A program could provide grants for substantial rehabilitation, provide matching grants for homeowner improvements, or implement proactive code enforcement program.

6. *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 include a complete analysis of Affirmatively Furthering Fair Housing (AFFH). The element must be revised to add 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.

7. *Develop a plan that incentivizes and promotes the creation of accessory dwelling units that can be offered at affordable rent... (Gov. Code, § 65583, subd. (c)(7).)*

Program 4-H (Promote Accessory Dwelling Unit Ordinance): The program should include proactive outreach throughout the planning period. In addition, the program should include incentives beyond the City's ordinance and webpage and commit to monitor permitted ADUs and affordability every other year and take appropriate action such as adjusting assumptions or rezoning within a specified time (e.g., 6 months) if assumptions are not realized.

D. Quantified Objectives

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

The element generally did not address this requirement. The element must include quantified objectives for construction, rehabilitation, and conservation by income group, including extremely low-income households. Please see the Building Blocks for additional information.

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 summary of public participation including outreach to the community, it must also describe whether translation services were available during public participation including, but not limited to, public workshops, Planning Commission, and City Council meetings.

F. Consistency with General Plan

The Housing Element shall describe the means by which consistency will be achieved with other general plan elements and community goals. (Gov. Code, § 65583, subd. (c)(7).)

While the element discusses how internal consistency will be achieved with other elements of the general plan as part of the housing element update, it should also discuss how internal consistency will be maintained throughout the planning period.