City of San Bruno

2023-2031 Housing Element

Technical Background Report

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Introduction

Portola Highlands Neighborhood, City of San Bruno

This Housing Element Technical Background Report provides the detailed information and analysis used in developing the Element's programs for the 2023-2031 planning period. Providing the technical information in a separate report allows the Element itself to focus on housing strategies and solutions. This Technical Background Report consists of the following sections:

- Section 1 – Introduction
- Section 2 – Housing Needs Assessment
- Section 3 – Housing Constraints and Resources
- Section 4 – RHNA Strategy and Sites Inventory
- Section 5 – Affirmatively Furthering Fair Housing
- Section 6 – Public Engagement
- Section 7 – Previous Accomplishments

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

Summary of Changes to State Housing Laws

The following items represent substantive changes to state housing law since the City's 2015 - 2023 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.

Moderate-income zoning requirement AB 725: This bill requires a jurisdiction to plan for at least 25 percent of moderate-income units to be located in areas zoned for at least four units per parcel (but not more than 100

units per acre) and at least 25 percent of above-moderate income unites to be located in areas zoned for at least for units per parcel.

All of the sites in the Sites Inventory are in areas zoned for at least four units of housing per parcel, complying with AB 725.

The proposed General Plan land use changes allow for densities of at least 18-25 du/ac, which would allow more than four units on each site. The highest density permitted is 75 du/ac. There are two sites in the site inventory, Site #218.1 and Site #218.2, that allow 2 units each but are part of a larger assemblage of parcels that also includes Site #218.3. This site would allow a combined 9 units.

Housing Needs Assessment

Skyline Ridge Neighborhood, City of San Bruno

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.

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, 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.

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	6,023,577	10%	11%	16%
2000	40,165	707,161	6,783,760	3%	9%	13%
2010	41,114	718,451	7,150,739	2%	2%	5%
2020	43,908	764,432	7,765,630	7%	6%	9%

Source: U.S. Census Bureau

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. 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 in- migration. 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, likely due to factors such as rising housing costs and low numbers of new units.

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.[1] 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.[2] 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.

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% to 12% depending on the age group. As a result of these demographic shifts, the median age in San Bruno increased from 36.2 in 2000 to 39 in 2019.

1 Comprehensive Housing Market Analysis for San Francisco-San Mateo-Redwood City, California (huduser.gov).
2 California Department of Transportation: San Mateo County Economic Forecast.

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.

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 2-1).

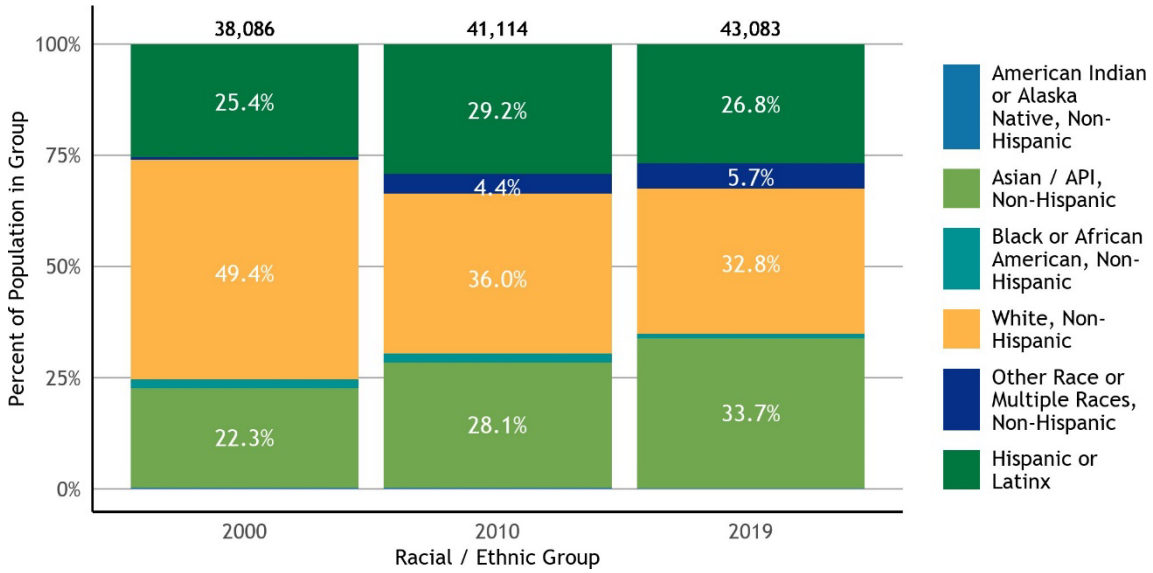

Figure 2-1 San Bruno Population by Race, 2000-2019

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 2-2).

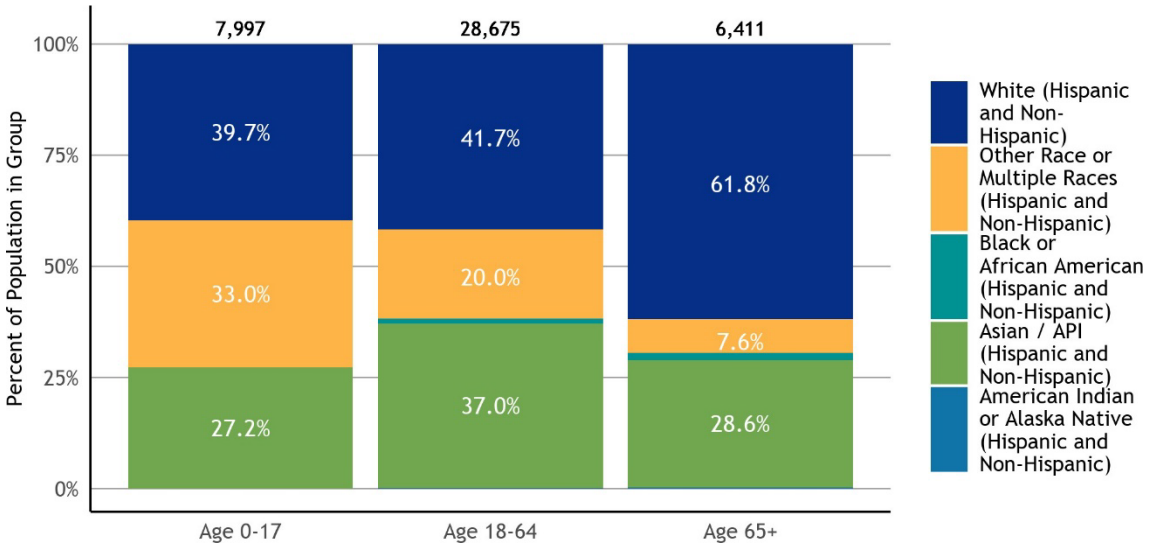

Figure 2-2 San Bruno Senior and Youth Population by Race

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.

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.[3]

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

	Number of Persons Per Household				
Income Category	**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.

3 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).

The graph below shows the distribution of households by income in San Bruno, San Mateo County and the Bay Area.[4] Almost half of 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 2-3). 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 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.[5]

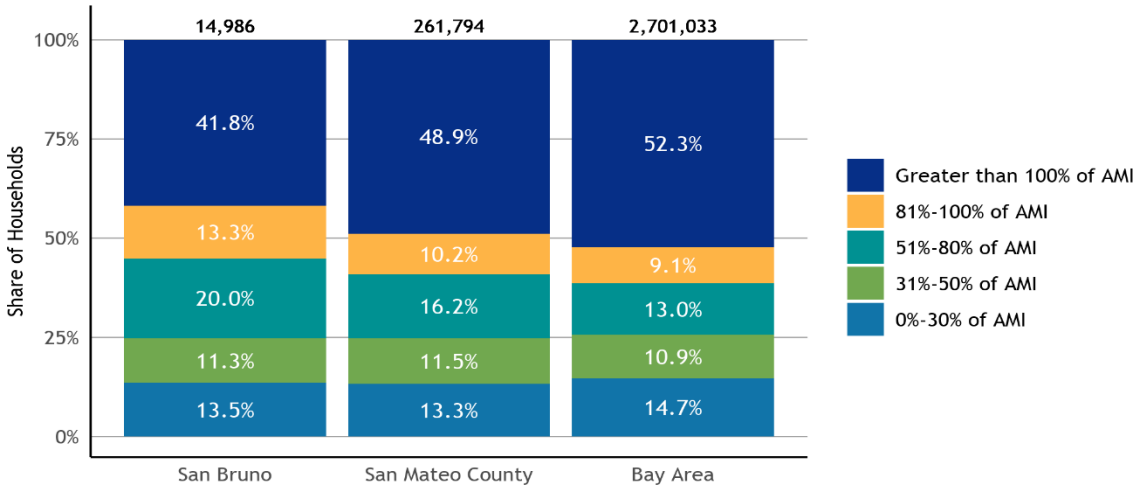

Figure 2-3 Households by Household Income Level

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. 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 (Figure 2-4).

4 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.

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

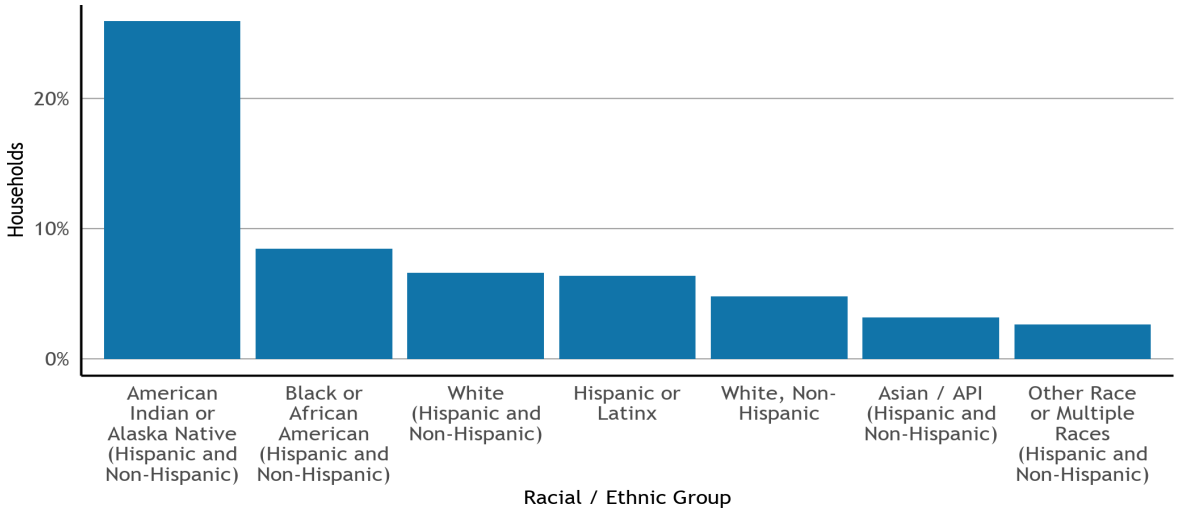

Figure 2-4 Poverty Status by Race

Universe: Population for whom poverty status is determined
Notes: The Census Bureau uses a federally defined poverty threshold that remains constant throughout the country and does not correspond to Area Median Income. For this table, the Census Bureau does not disaggregate racial groups by Hispanic/Latinx ethnicity. However, data for the white racial group is also reported for white householders who are not Hispanic/Latinx. Since residents who identify as white and Hispanic/Latinx may have very different experiences within the housing market and the economy from those who identify as white and non-Hispanic/Latinx, data for multiple white sub-groups are reported here. The racial/ethnic groups reported in this table are not all mutually exclusive. Therefore, the data should not be summed as the sum exceeds the population for whom poverty status is determined for this jurisdiction. However, all groups labelled "Hispanic and Non-Hispanic" are mutually exclusive, and the sum of the data for these groups is equivalent to the population for whom poverty status is determined.
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B17001(A-I).

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 in 2019 there are a total of 15,063 occupied housing units, and fewer residents rent than own their homes: 41% versus 59% (Figure 2-5). This trend is similar in the overall region where 40% of San Mateo County households and 45% of Bay Area households rent their homes.

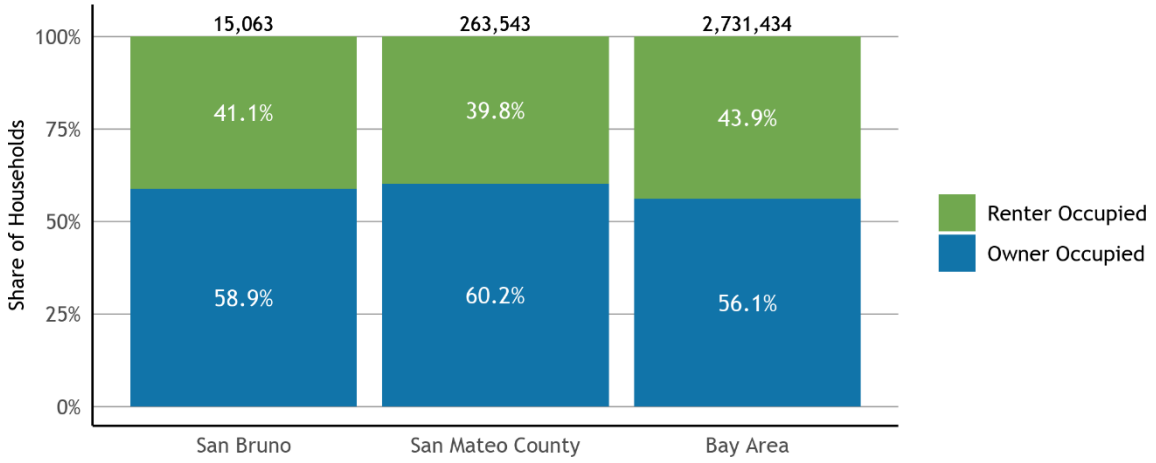

Figure 2-5 Housing Tenure

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
Percent Owners 2000	63%	61%	58%
Percent Renters	37%	39%	42%
Percent Owners 2011	58%	59%	56%
Percent Renters	42%	41%	43%
Percent Owners 2019	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.6 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 2-6).

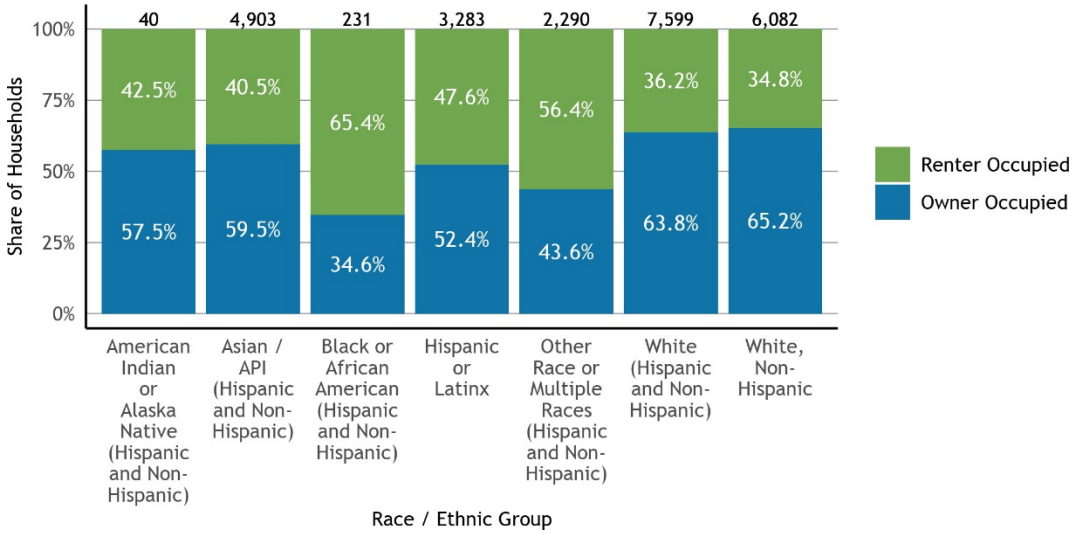

Figure 2-6 Housing Tenure by Race of Householder

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

6 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.

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 2-7). 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.

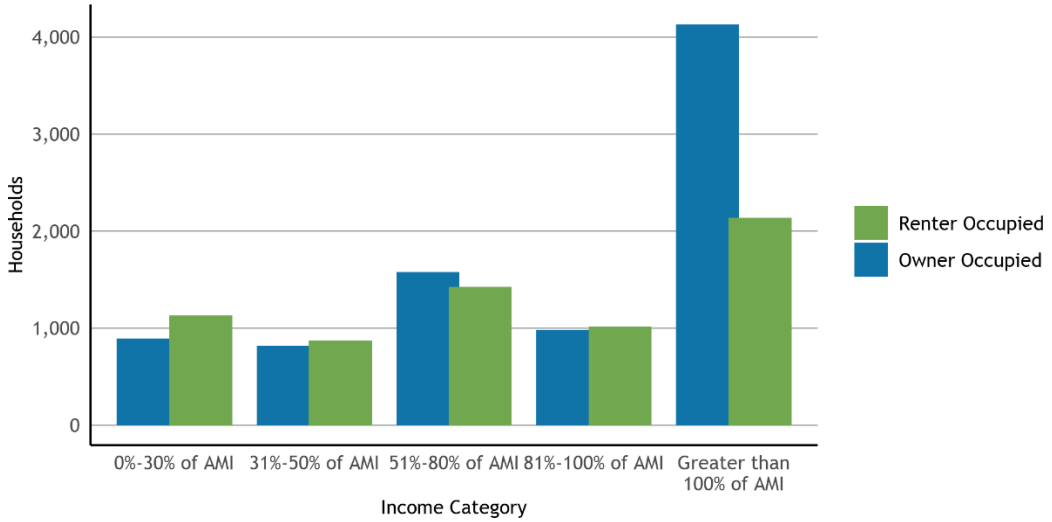

Figure 2-7 Household Income Level by Tenure

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 2-8).

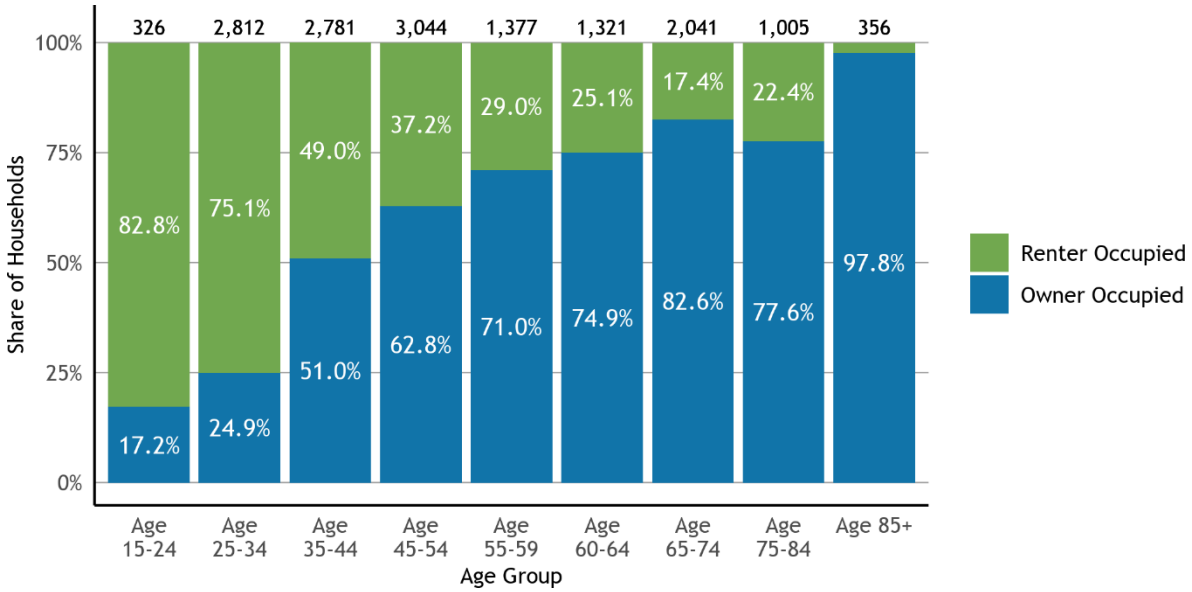

Figure 2-8 Housing Tenure by Age

Universe: Occupied housing units
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B2500

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 2-9).

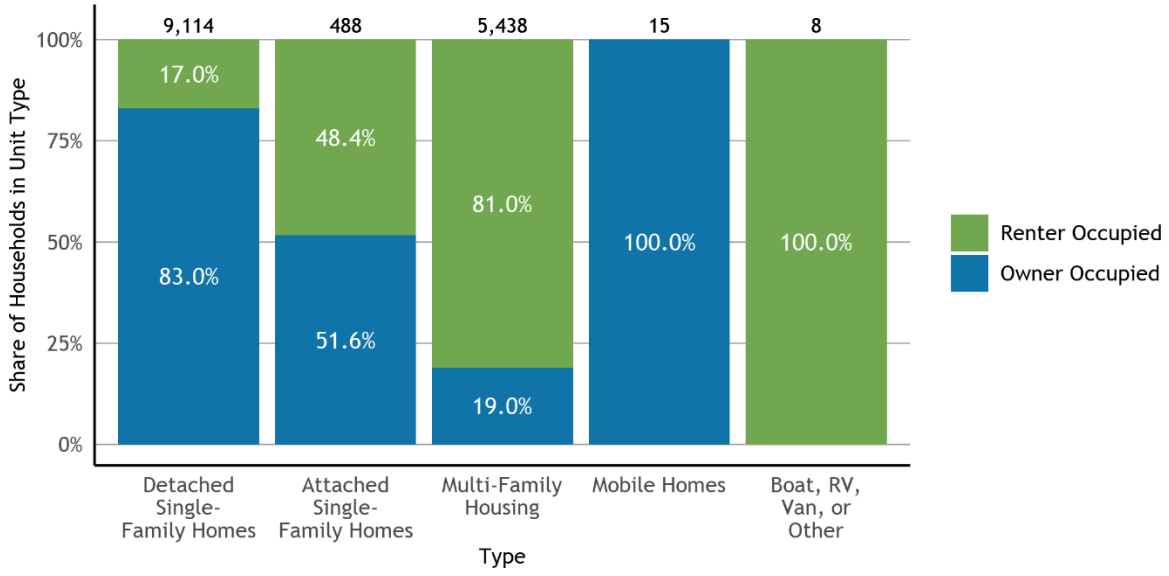

Figure 2-9 Housing Tenure by Housing Type

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

- 2017 data shows San Bruno has:
  - Fewer households (42%) with Above Moderate income (100%+ AMI) category than San Mateo County (49%) and the Bay Area (52%).
  - More households (20%) in the Low income (51-80% AMI) category than San Mateo County (16%) and the Bay Area (13%).
  - Similar households (25%) in the Very Low and Extremely Low (0-50% AMI) categories than San Mateo County (25%) and the Bay Area (26%)
- Poverty level by racial/ethnic group is the highest (nearly 25%) for American Indian or Alaska Native (Hispanic and Non-Hispanic), though that population is a small sample size of 40 households. Asian/API (Hispanic and Non-Hispanic) and Other Race or Multiple Races (Hispanic and Non-Hispanic) have the lowest poverty rates.
- 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.
- Above Moderate Income Households are twice as likely to own their home than rent, and all other income categories have roughly equal rates of ownership or rental status. 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.

Housing

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 5.2% 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 2-10). From 2010 to 2019, 5.2% of San Bruno's current housing stock was built, a total of 803 housing units, according to the Department of Finance.

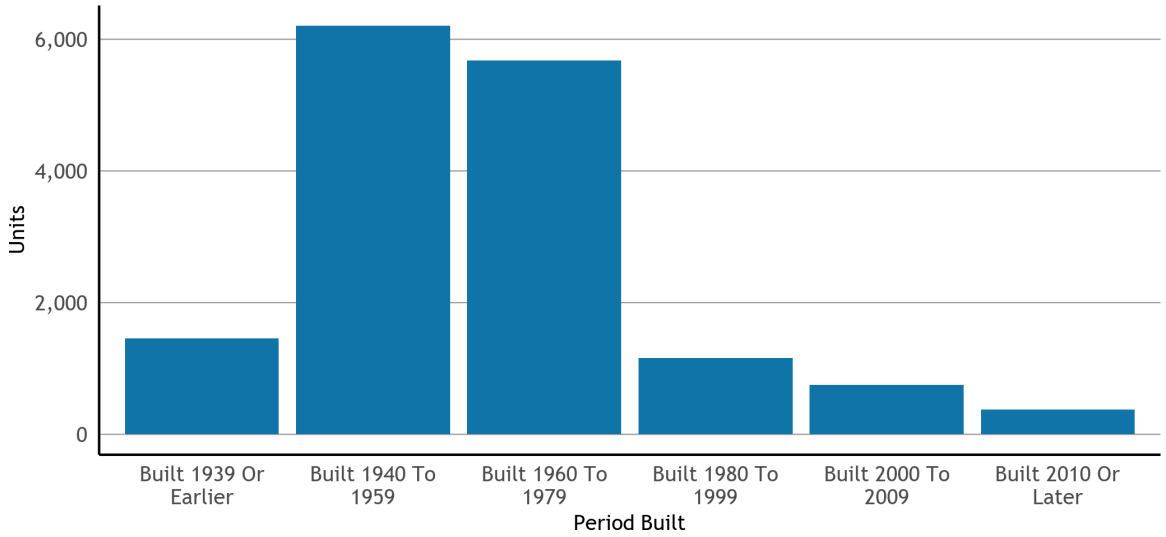

Figure 2-10 Housing Units by Year Structure Built

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 2-11). 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 includes 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.

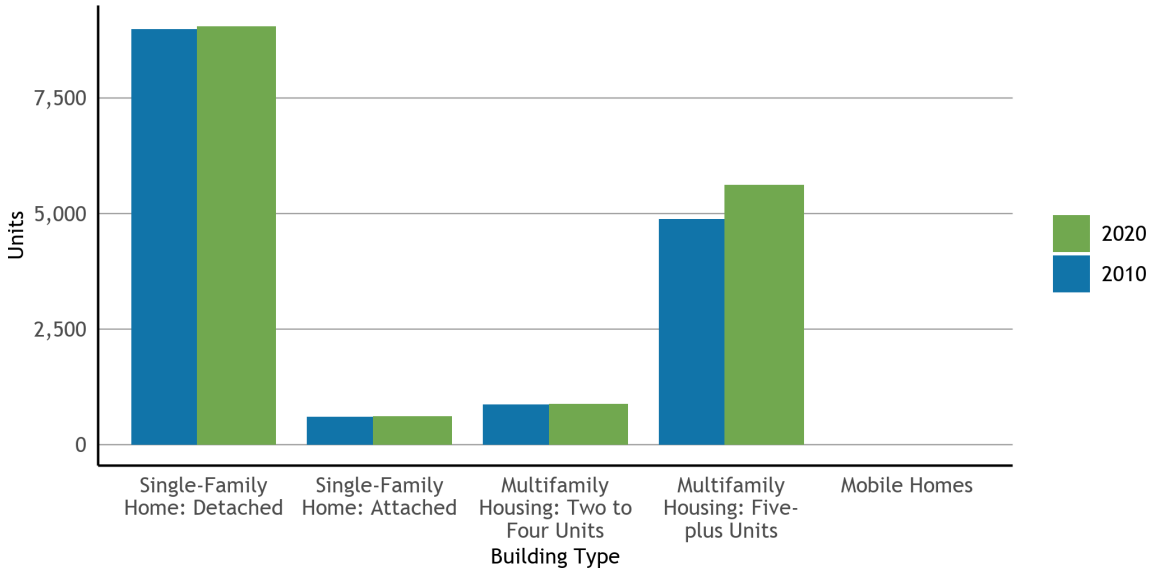

Figure 2-11 Housing Type Trends

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

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% in 2019. Vacant units make up 3.7% of the overall housing stock in San Bruno (Table 2-8).[7]

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 recreational or occasional use, and units classified and other vacant, is actually 2.6% of the total housing units that are listed for rent.[8] In a region with a thriving economy and housing market like the Bay Area, units being renovated/repaired 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.[9] 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 2-12).

7 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*.

8 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.

9 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.

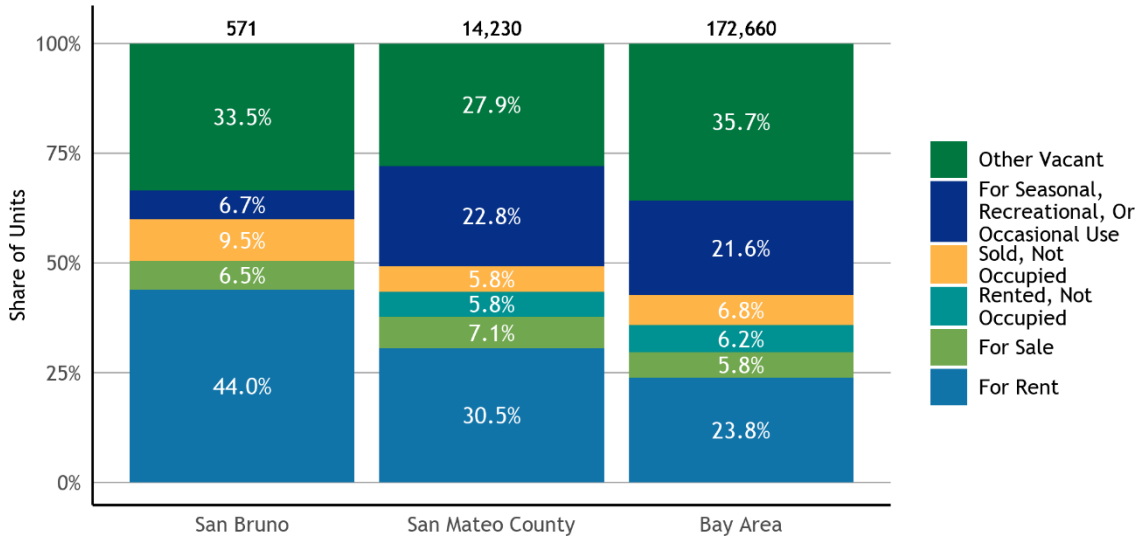

Figure 2-12 Vacant Units by Type

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 2-13). 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).

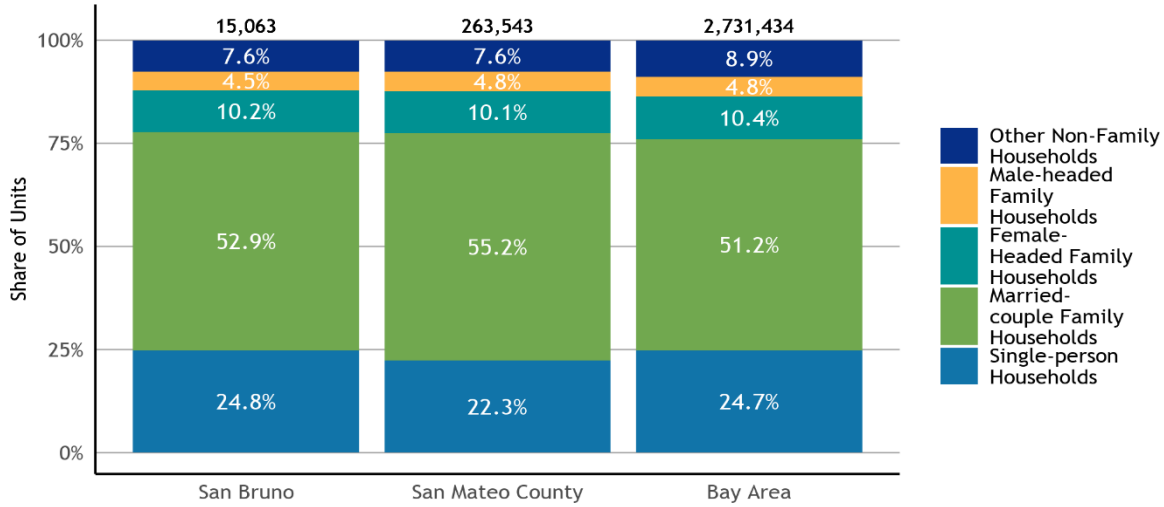

Figure 2-13 Household Type

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.

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.[10] 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 2-14). 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.

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

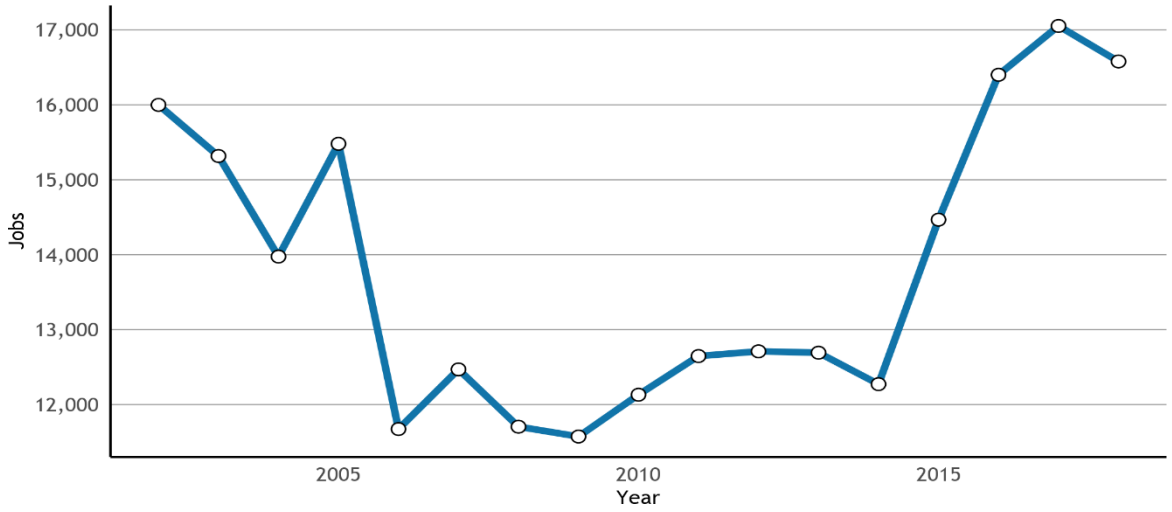

Figure 2-14 Jobs in a Jurisdiction

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%.

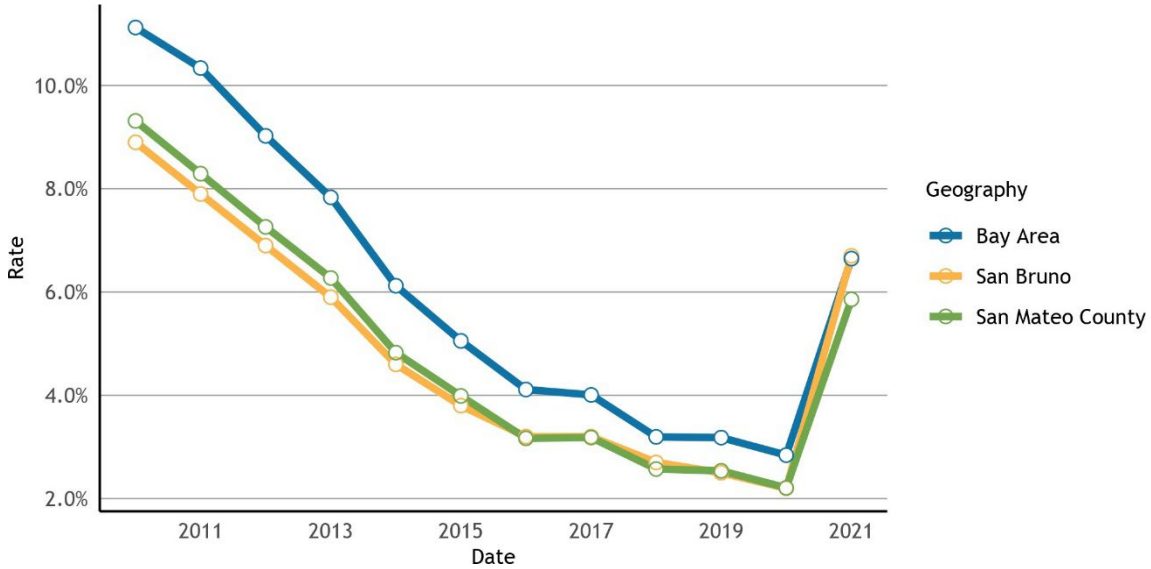

Figure 2-15 Unemployment Rate

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.

Industry Sector Composition

Jobs at San Bruno Job Sites

There are 16,229 jobs located at San Bruno job sites.[11] 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.[12] 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).[13]

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 the industry sectors regionally. Most Bay Area, San Mateo County and San Bruno residents work in Health & Educational Services (Figure 2-16) followed by Financial & Professional Services.

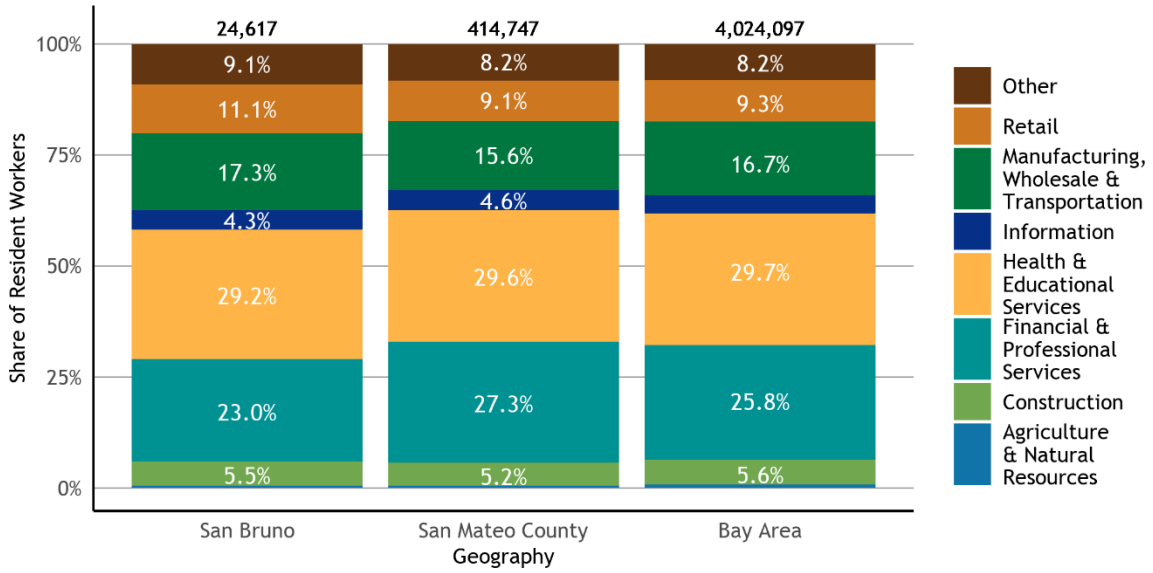

Figure 2-16 Resident Employment by Industry

Universe: Civilian employed population age 16 years and over.
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table C240304.

11 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).

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

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

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.[14] 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).[15] 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 indicate there is demand for housing options at prices that are affordable to households where individual workers make less than $75,000 annually.[16] 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 2-17 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.

14 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).

15 Home - Self Sufficiency Standard.

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

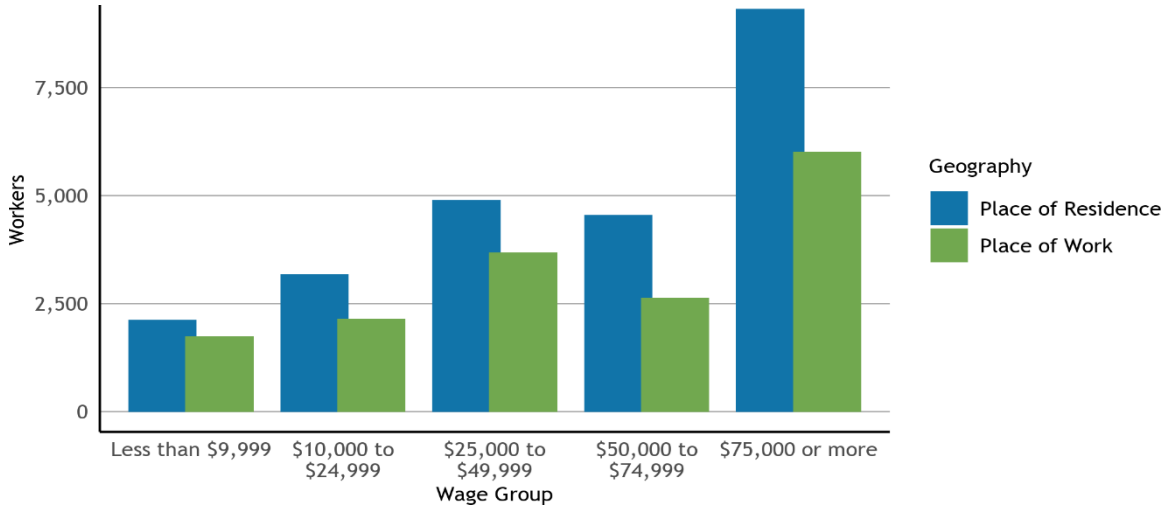

Figure 2-17 Employed Residents and Jobs in San Bruno by Wage Group

Universe: Workers 16 years and over with earnings.
Source: U.S. Census Bureau, American Community Survey 5-Year Data 2015-2019, B08119, B08519.

Figure 2-18 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 2-18).[17] Figure 2-19 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.

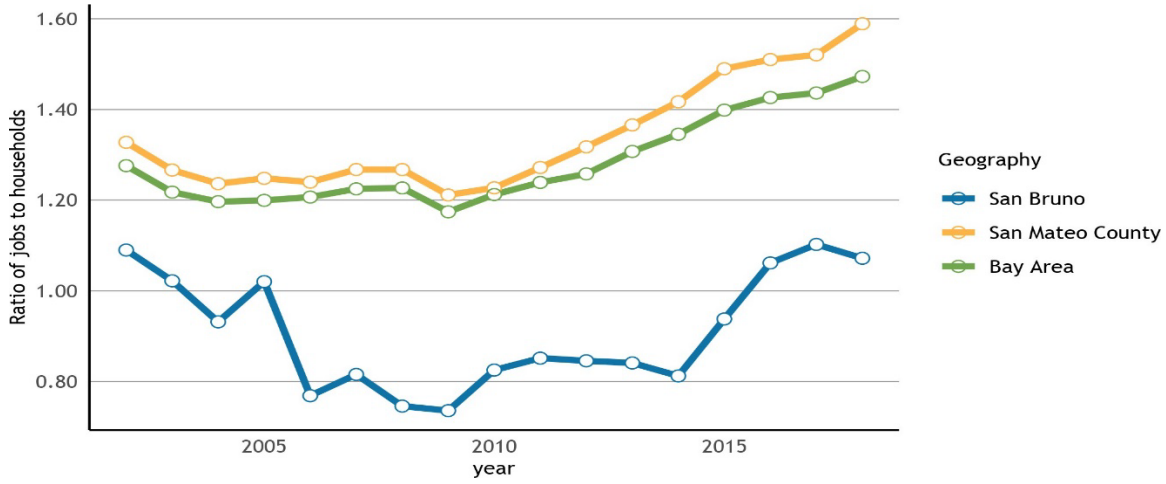

Figure 2-19 Jobs-Household Ratio

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.

17 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.

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 2-20). [18]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.[19]

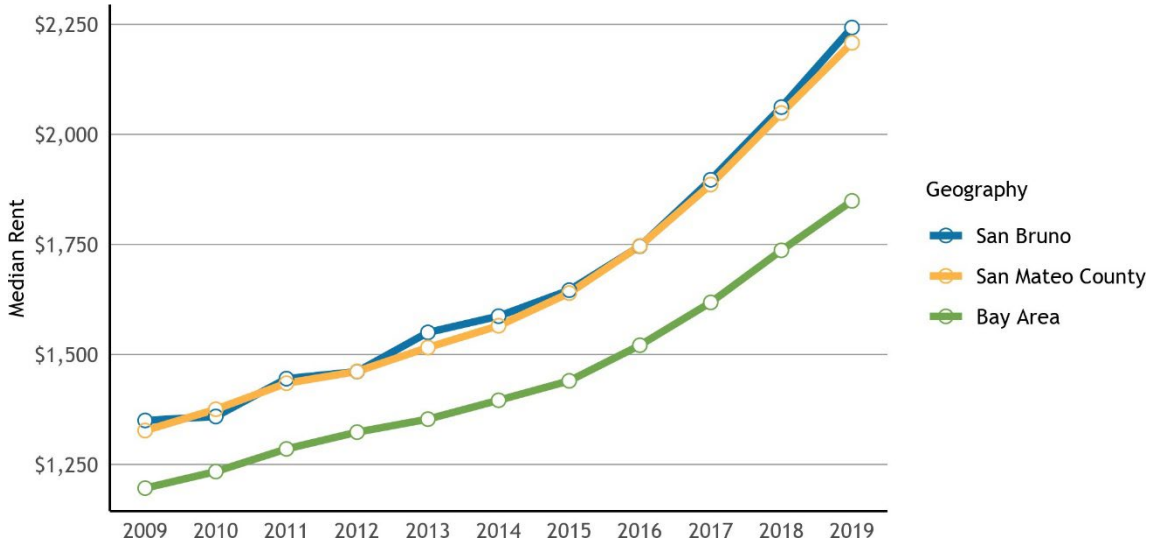

Figure 2-20 Median Contract Rent

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.[20] Prior to the recent decline, year-over-year rent growth had been positive since 2009.

Figure 2-21 shows the distribution of rentals at various prices in San Bruno, San Mateo County and the Bay Area. Between 2015 and 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.

18 Note that contract rents may differ significantly from, and often being lower than, current listing prices.
19 While the data on home values shown in Figure 2-20 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.
20 Comprehensive Housing Market Analysis for San Francisco-San Mateo-Redwood City, California: https://www.huduser.gov/portal/publications/pdf/SanFranciscoSanMateoRedwoodCityCA-CHMA-20.pdf

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 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.

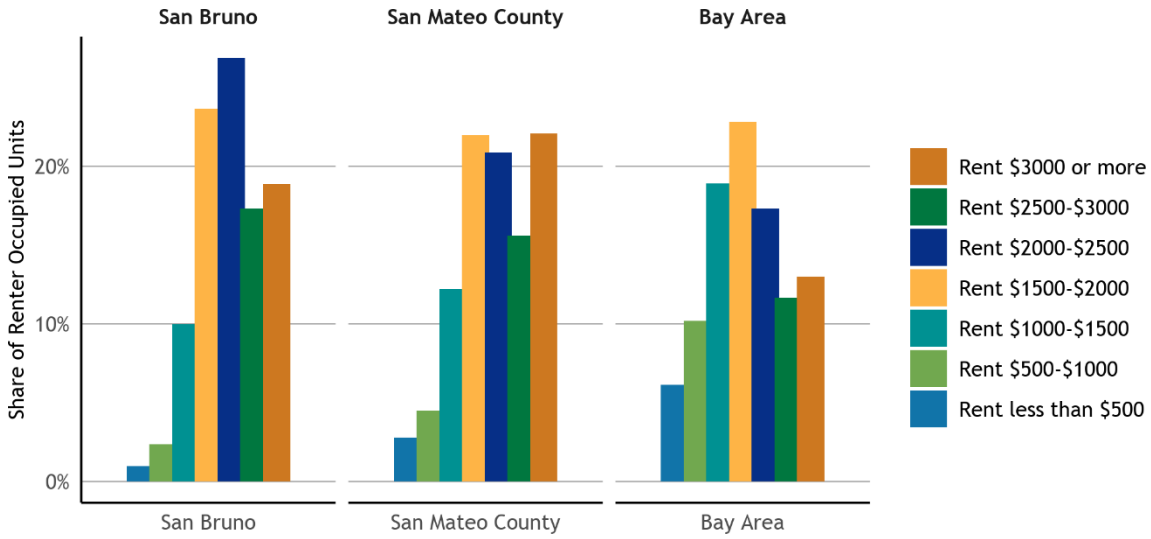

Figure 2-21 Contract Rents for Renter-Occupied Units

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.[21]

21 California Housing Partnership Housing Needs Dashboard: https://chpc.net/housingneeds/.

TABLE 2-12 2022 SAN MATEO MAXIMUM AFFORDABLE RENT PAYMENTS

	Maximum Affordable Rent Payment ($)				
Income Category	**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.

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%).[22] The report also highlights unprecedented actions of the state 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

22 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).

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.[23] 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/.

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 2-22). 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.

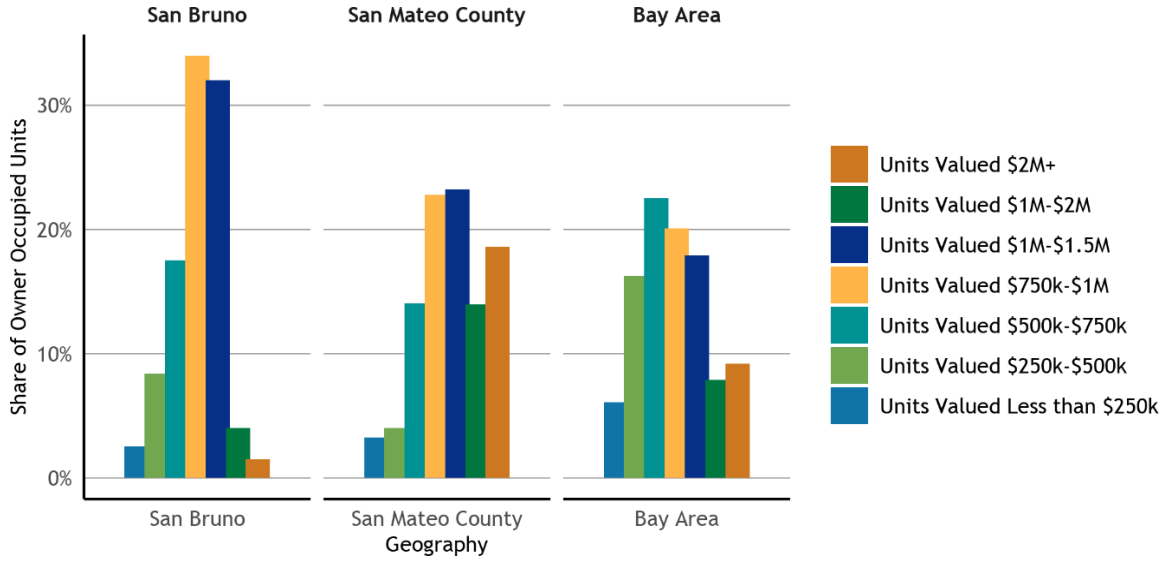

Figure 2-22 Home Values of Owner-Occupied Units

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

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

The region's home values have increased dramatically since 2000, besides a temporary decrease during the Great Recession 2007-2011 (Figure 2-23). 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.[24] 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.

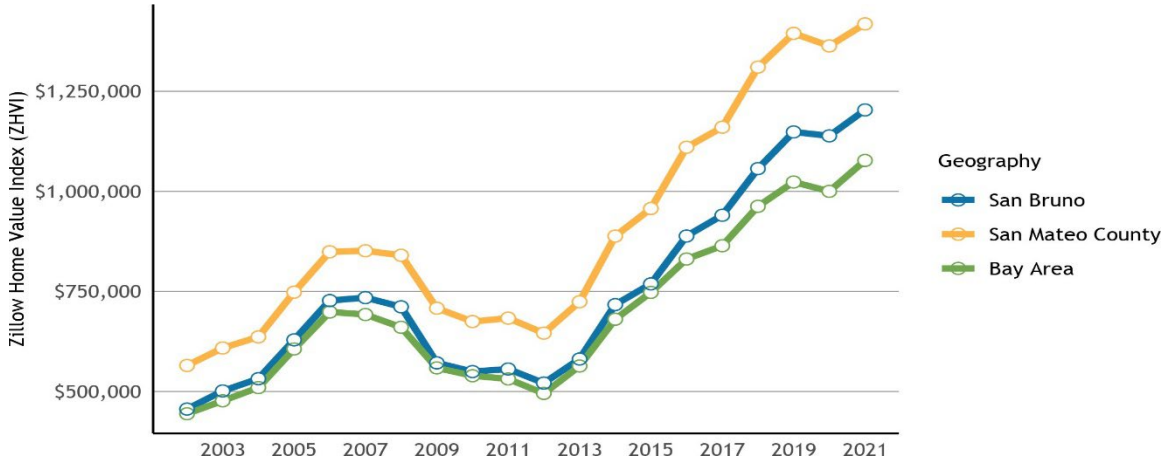

Figure 2-23 Zillow Home Value Index (ZHVI)

Universe: Owner-occupied housing units. Source: Zillow, Zillow Home Value Index (ZHVI).

The impact of pursuing the collective programs (total programs) included under Goal 3 "Removal of governmental constraints" to housing production (three programs) and Goal 2 "Production of Housing and Provision of Adequate Housing Sites" (six 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 and increasing housing opportunities in higher resource neighborhoods.

Programs 12 – 18, under Goal 4: Affirmatively Furthering Fair Housing, aim to increase resident and property owner awareness of fair housing laws, ensure affirmative marketing plans for new affordable units, provide support for homeless prevention and services, promote other housing options through San Mateo County Housing Authority and Housing Investment Partnership (HIP), establish tenant protection ordinances and

24 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).

anti-displacement plans. These programs are described further in Chapter 3 of the Housing Element (Housing Plan).

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.

Overpayment and Cost-Burdened Households

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 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 2-24).

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% if 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 2-25 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 2-26).

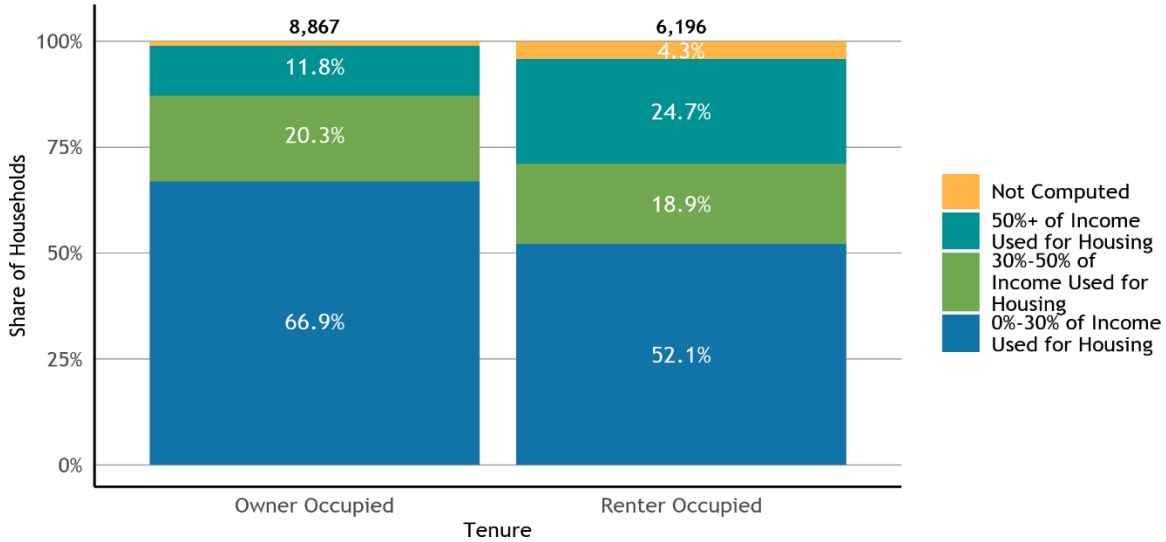

Figure 2-24 Cost Burden by Tenure

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

Figure 2-25 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.

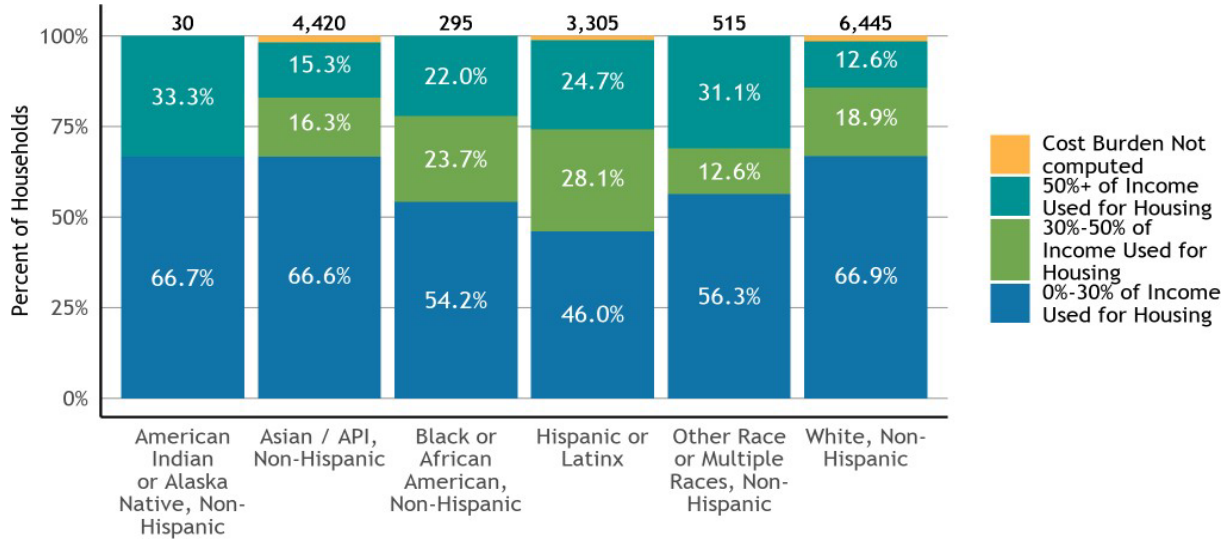

Figure 2-26 Cost Burden by Race

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 2-27).

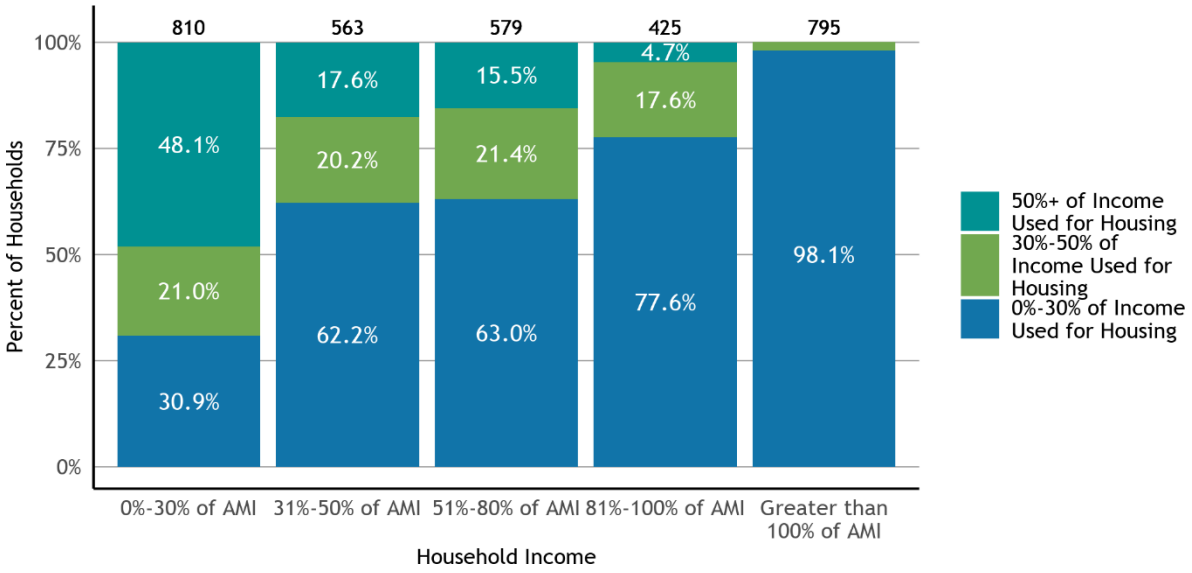

Figure 2-27 Cost-Burdened Senior Households by Income Level

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 2-28). 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.

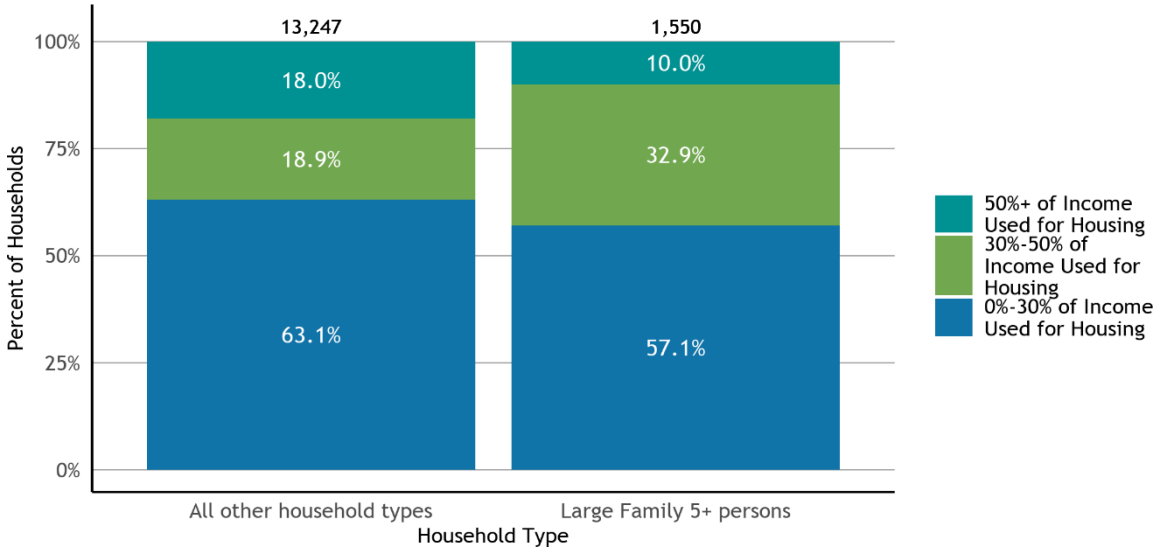

Figure 2-28 Cost Burden by Household Size

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

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.

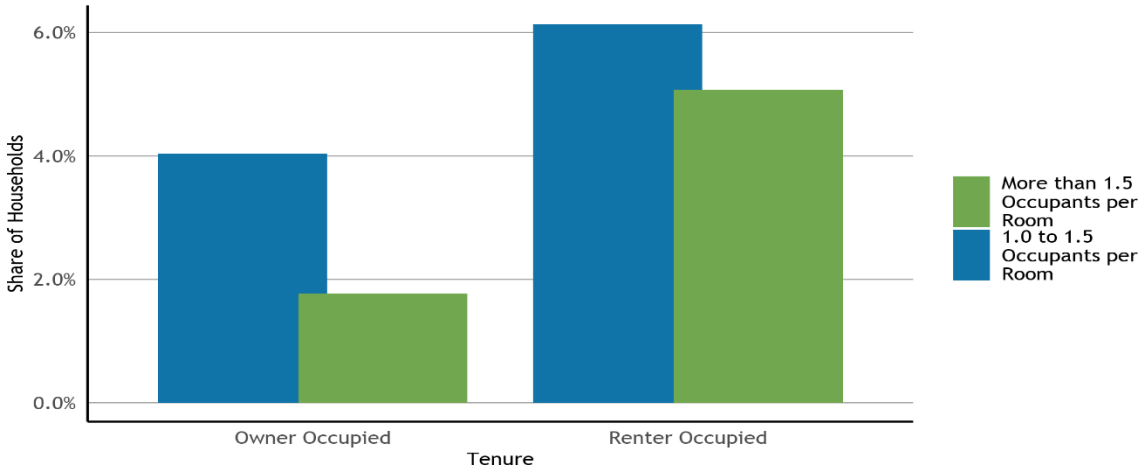

Figure 2-29 San Bruno Overcrowding by Tenure and Severity

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 who 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 2-30).

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 2-31).

Figure 2-30 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.

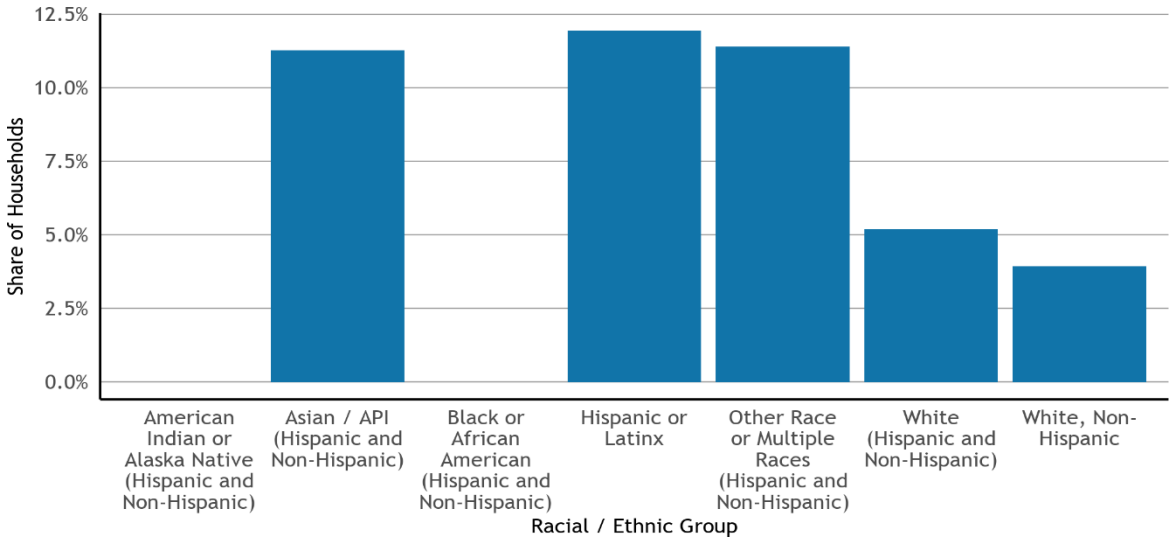

Figure 2-31 Overcrowding by Race

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 10.g. 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 11 will require updating the City's Accessory Dwelling Unit Ordinance, and Program 4.c. would support and promote pre-approved ADU plans, making it easier to build ADUs in the city. Program 4.a. sets a goal of issuing building permits for 28 accessory dwelling units per year.

Other Housing Issues

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 2-32). 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.

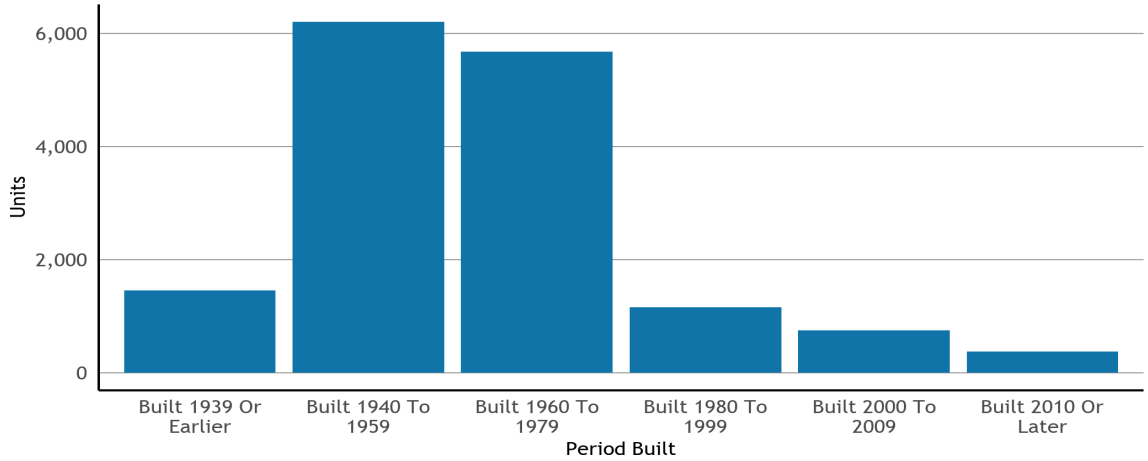

Figure 2-32 Housing Units by Year Structure Built

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).

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).[25] 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 housing stocks and actions, such as Program 1, to help renovate and retrofit existing housing stock, especially for naturally occurring affordable units.

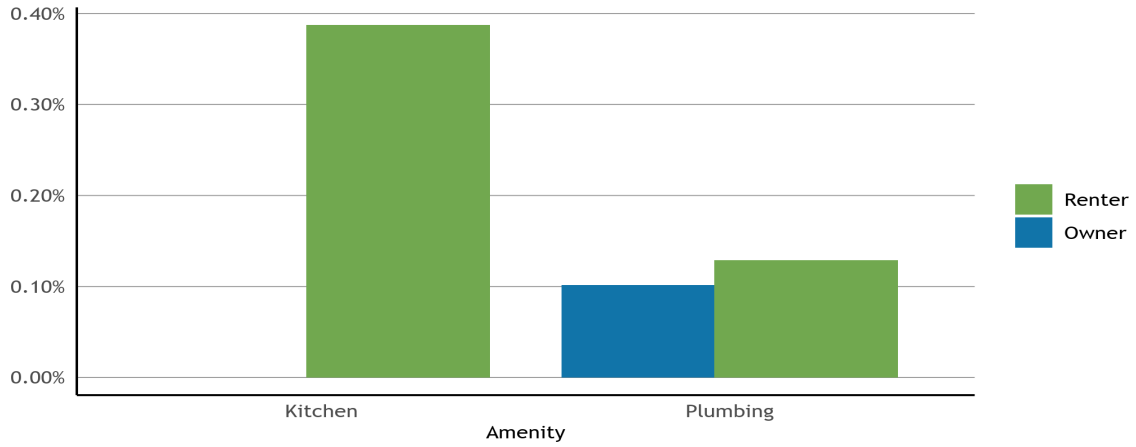

Figure 2-33 Substandard Housing Issues

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

25 The U.S. 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.

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.

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.[26] This would be a 26% increase in the number

26 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).

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).

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 2-34). 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 15.c. supports home sharing programs through the Senior Center and other local agencies.

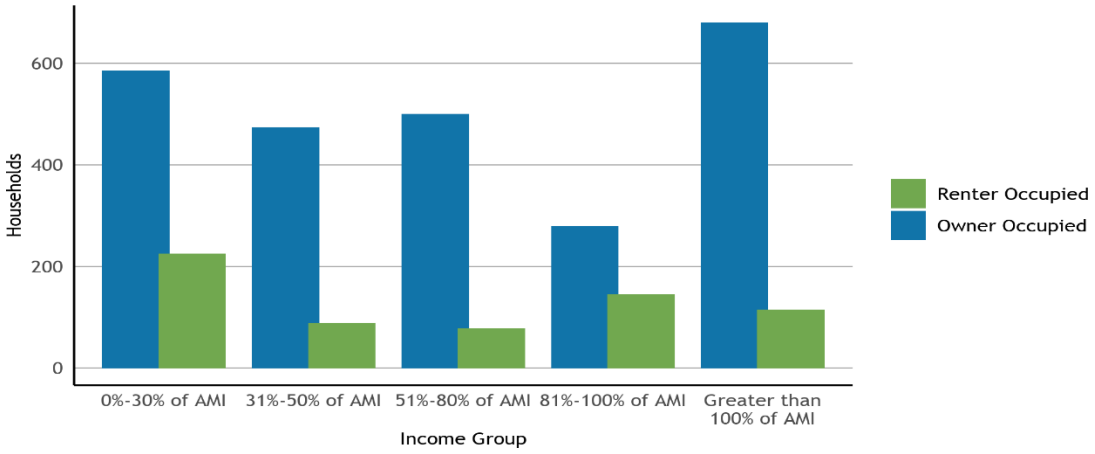

Figure 2-34 San Bruno Senior Households by Income and Tenure

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. However, it should be noted that seniors experience lower rates of housing costs burden than the general population.

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.

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 2-35 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.[27]

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,

27 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.

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.

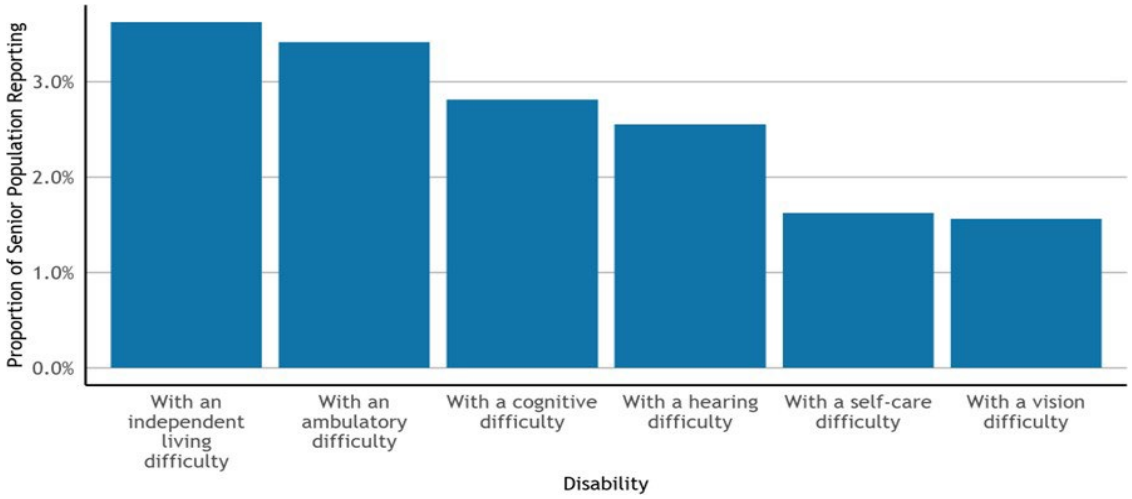

Figure 2-35 Disability by Type

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

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.[28]

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.[29]

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 6.b. to develop requirements that increase the number of housing units with accessibility features.

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.

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.

28 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.

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

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.

Appendix F (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 13 which specifically address these challenges. Program 12.b. implements education and training for landlords and tenants about fair housing laws and tenants' rights.

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 2-37). 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.

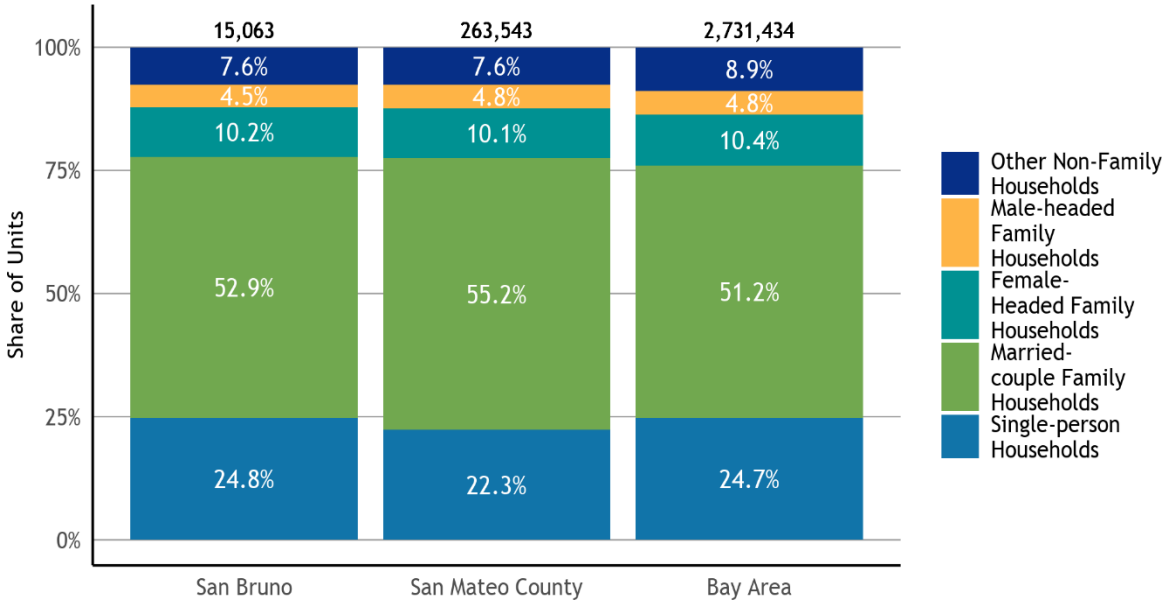

Figure 2-36 Household Type

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

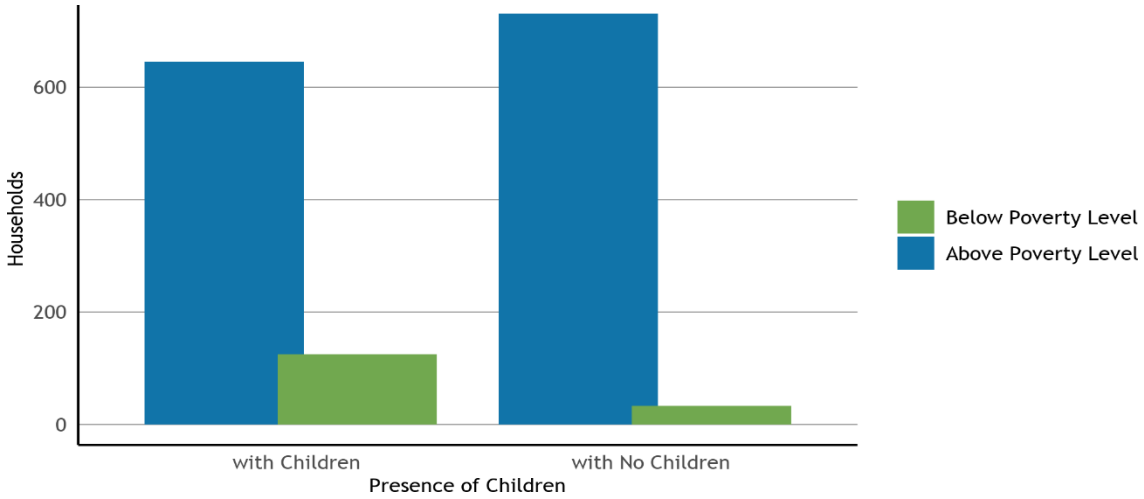

Figure 2-37 Female-Headed Households by Poverty Status

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

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 2-38). In 2017, 20% of large households were very low-income, earning less than 50% of the AMI.

Program 6.b. 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 9. seeks to increase housing by pursuing additional ways to streamline development of or granting fee waivers for affordable housing projects. Program 10.a. seeks to lower parking requirements to align with state law. These programs aim to increase the percentage of housing to accommodate residents with disproportionate housing needs, including large families.

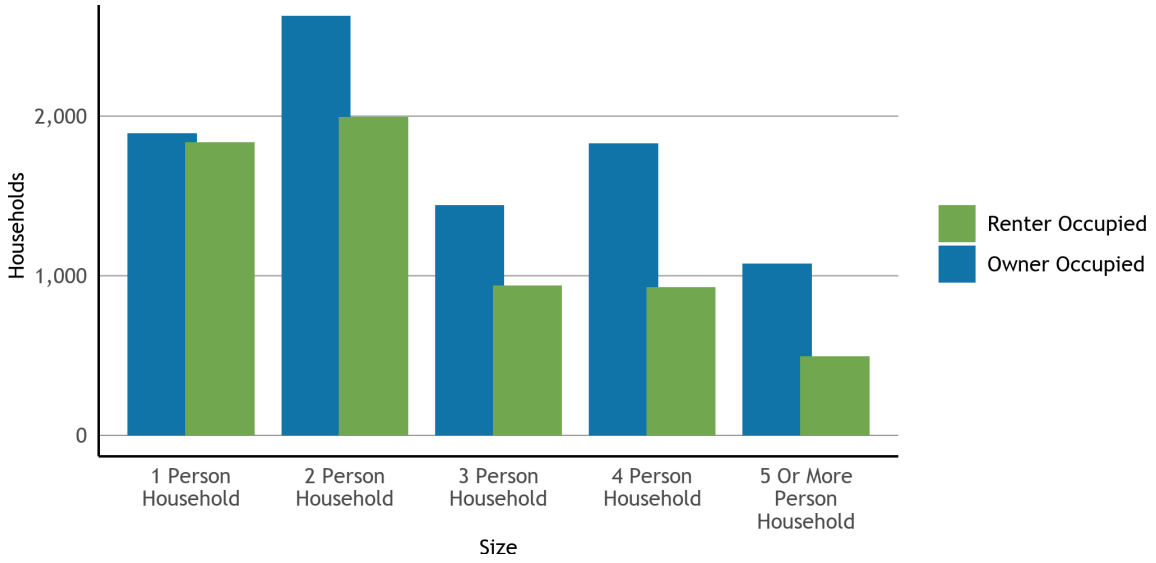

Figure 2-38 Household Size by Tenure

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 2-39).

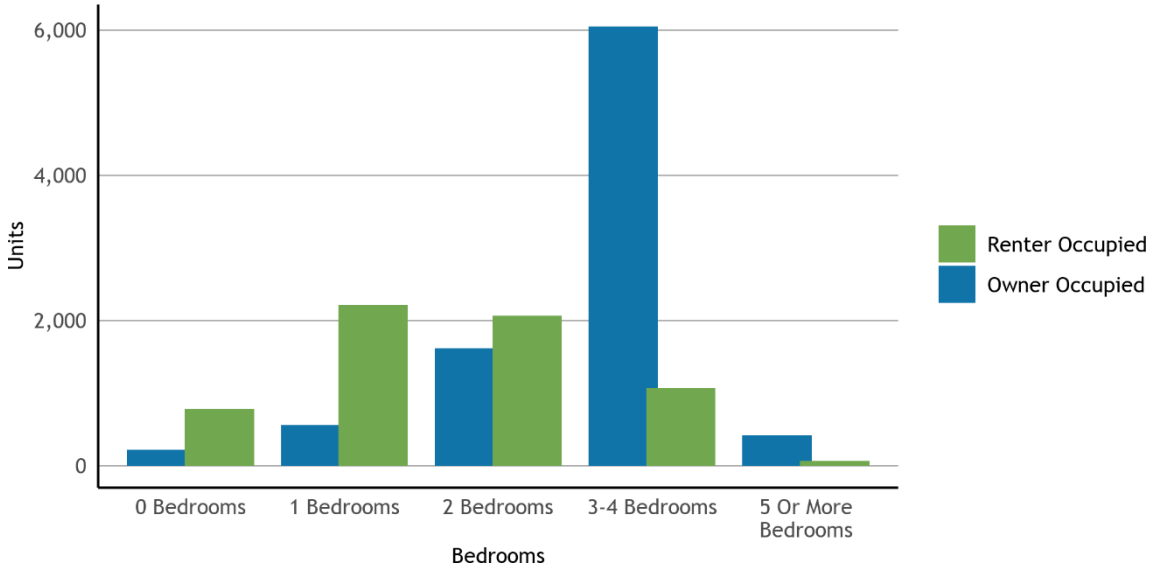

Figure 2-39 Housing Units by Number of Bedrooms

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

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 state[30]. 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.[31] 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 lower income households. In San Bruno, the effects were felt across all communities but exceedingly affected Native American, Multi-racial, and African American 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.

Program 11 would revise the zoning ordinance to support the housing needs of households with extremely low incomes. Programs 14.a. and 15.b. and 15.c. would support extremely low-income households that become homeless by continuing City support social services for housing and homeless prevention, continuing to participate in the San Mateo County Housing Authority's Housing Choices Voucher program (formerly the federal Section 8 program), and promoting home sharing opportunities through support of Housing Investment Partnership (HIP) Home Sharing program, which facilitates living arrangements among two or more unrelated people.

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

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

31 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.

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% and 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 2-40). Latino residents represent 38% of the population experiencing homelessness, while Latino residents comprise 25% of the general population (Figure 2-42). In 2017, 89% of households were either single individuals or couples without children and 13% were households with children.[32] Of homeless households with children, most are sheltered in transitional housing (Figure 2-43).

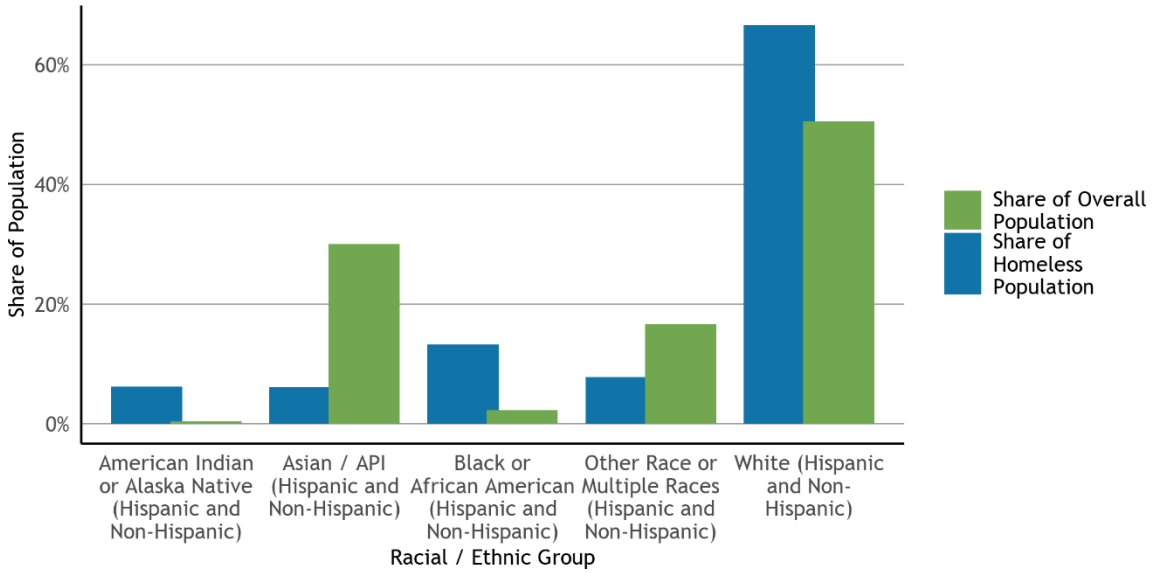

Figure 2-40 Racial Group Share of General and Homeless Populations, San Mateo County

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).

32 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).

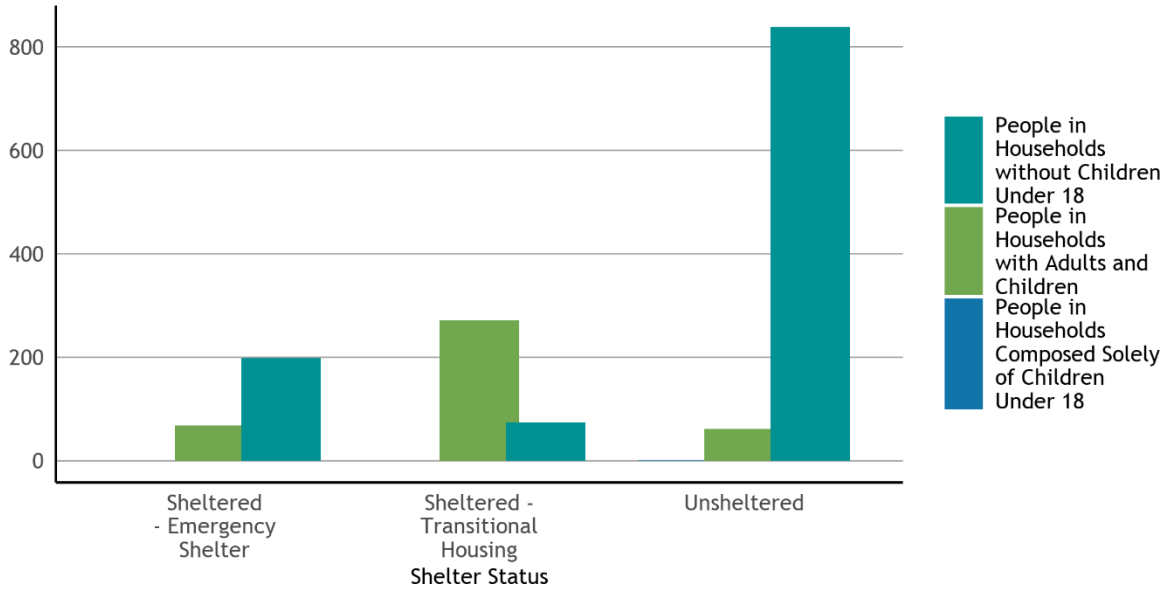

Figure 2-41 Homelessness by Household Type and Shelter Status, San Mateo County

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

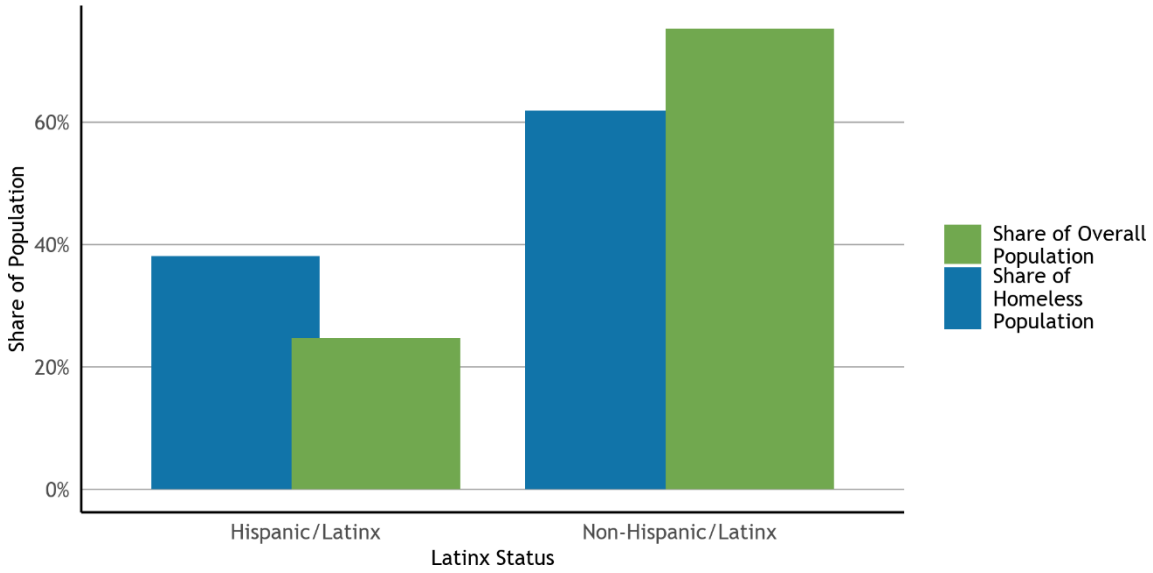

Figure 2-42 Latino Share of General and Homeless Populations, San Mateo County

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 2-43). Of those, some 62% are unsheltered, further adding to the challenge of handling the issue.

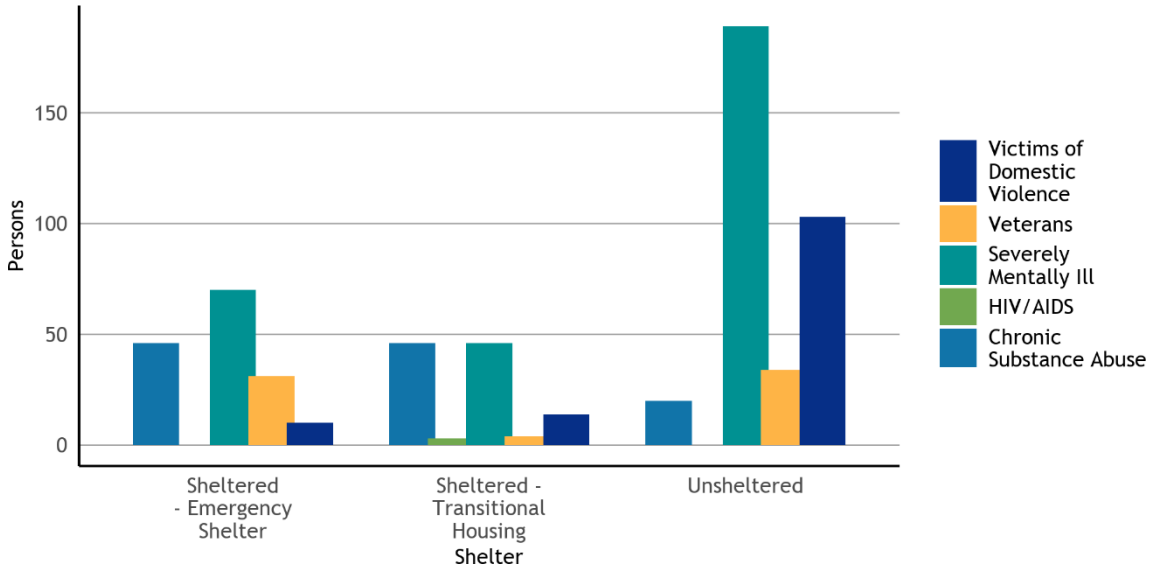

Figure 2-43 Characteristics for the Population Experiencing Homelessness, San Mateo County

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 homeless 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).

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
2022	1,808

Source: San Mateo County Human Services Agency, 2022.

According to the 2022 San Mateo County One Day Homeless Count[33] 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 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).[34] 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.[35] 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.

33 https://www.smcgov.org/media/130616/download?inline=

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

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

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.

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.

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 2-44).

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.

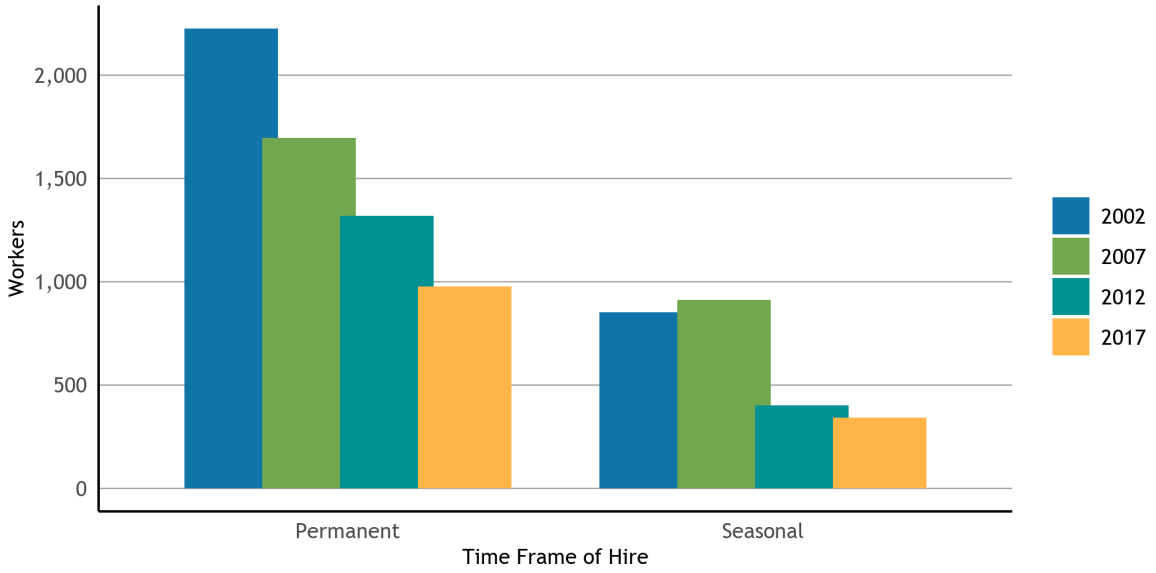

Figure 2-44 Farm Operations and Farm Labor by County, San Mateo County

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.

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.

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%.

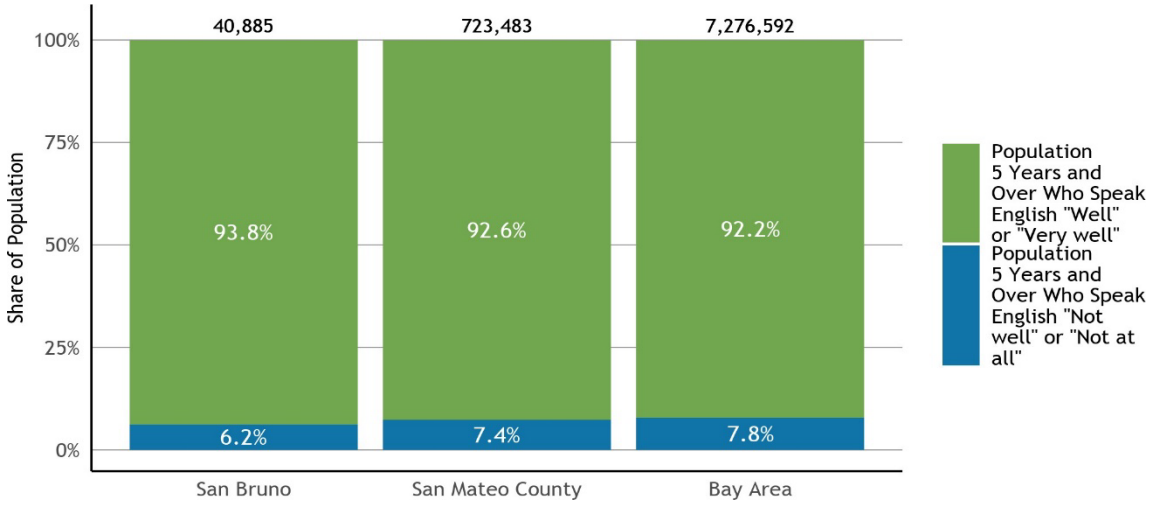

Figure 2-45 Population with Limited English Proficiency

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.

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 334 assisted units in San Bruno in the Preservation Database. Of these units, 0.0% are at High Risk or Very High Risk of conversion.[36]

TABLE 2-24 ASSISTED UNITS

Income	San Bruno	San Mateo County	Bay Area
Low	329	4,656	110,177
Moderate	5	191	3,375
High	0	359	1,854
Very High	0	58	1,053
Total Assisted Units in Database	**334**	**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; the Village at the Crossing, also completed in 2007, and 10 and 12 Miraluna Drive (College Ridge) completed in 2022. All four 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 Archstone and Village projects received funding through a variety of sources including state bond tax-exempt financing, San Bruno Redevelopment Agency subsidies, and 4% tax credits. College Ridge was developed on land that is owned by Skyline College. The project is part of

36 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.

the College District's Employee Housing Program and is comprised of 30 multi-family units, 11 of which are deed-restricted affordable housing units. 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
Skyline College	10 and 12 Miraluna	11	30	n/a	2077	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 334 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.

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 18 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 6 proposes to amend the City's Affordable Housing Ordinance, possibly 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 6.b. 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).

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.

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.

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 Codes

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

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-L 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.

Conclusion

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. 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.

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Housing Constraints and Resources

Crestmoor Park Neighborhood, City of San Bruno

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.

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.

Transparency In Developmental Regulations

To increase transparency and certainty in the development application process as required by law, the City provides a range of information online for ease of access, some of which is as follows:

- City General Plan: https://www.sanbruno.ca.gov/629/General-Plan
- City Zoning Ordinance (Title 12): https://library.qcode.us/lib/san_bruno_ca/pub/municipal_code https://library.qcode.us/lib/san_bruno_ca/pub/municipal_code/item/title_12
- Planning Applications and Submittal Process: https://www.sanbruno.ca.gov/246/Planning-Application-Submittal-Process
- Development Fees: https://www.sanbruno.ca.gov/622/Development-Impact-Fees-Planning-Applications

Land Use Regulations

Land uses in San Bruno are largely segregated as the result of outdated zoning regulations. Commercial uses are concentrated along El Camino Real, San Mateo Avenue, and San Bruno Avenue, and in several regional and neighborhood shopping centers. Residential neighborhoods constitute the land area between these major commercial corridors, which include smaller, mixed-density residences located east of El Camino Real and larger, hillside homes located west of interstate 280. Several large open space areas are located in the hillside areas in the southwestern portion of the city and are typically undevelopable sloped open areas behind homes. The majority of San Bruno's land area consists of residential use, and neighborhoods are its most prominent feature. The city's older housing stock is primarily east and west of El Camino Real and contains the greatest diversity of land uses and residential types. Streets in this area are organized in a grid pattern that reflects their early 20th century roots. Housing west of Interstate 280 consists primarily of single-family subdivisions, but also several large multifamily complexes. The curvilinear street pattern in this area, commonly used in post-1950 residential subdivisions, is adapted to the steep, hilly terrain. As of the 2020 U.S. Census, there were approximately 14,951 housing units in San Bruno; 60 percent of these were single-family detached housing units. Citywide, San Bruno's average residential density is 10.6 housing units per net acre. East of El Camino Real mixed single and multifamily neighborhoods (San Bruno Park, Belle Air Park, and Lomita Park), average 16.3 housing units per net acre. Single-family neighborhoods between El Camino Real and I-280 (Mills Park and Huntington Park) average 10.5 housing units per net acre. West of I-280, in lower-density hillside neighborhoods (Pacific Heights, Portola Highlands, Monte Verde, Rollingwood, and Crestmoor), residential densities average 6.7 housing units per net acre. Large multifamily complexes in the western portion of the city average 29.1 housing units per net acre.

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. Properties within R-1-D districts fall under this category.
- **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. This designation applies to properties within R-1 and R-2 districts.
- **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. Properties within the R-3 district fall within this category.
- **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. This land use category applies to properties within the R-4 district.
- **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 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.

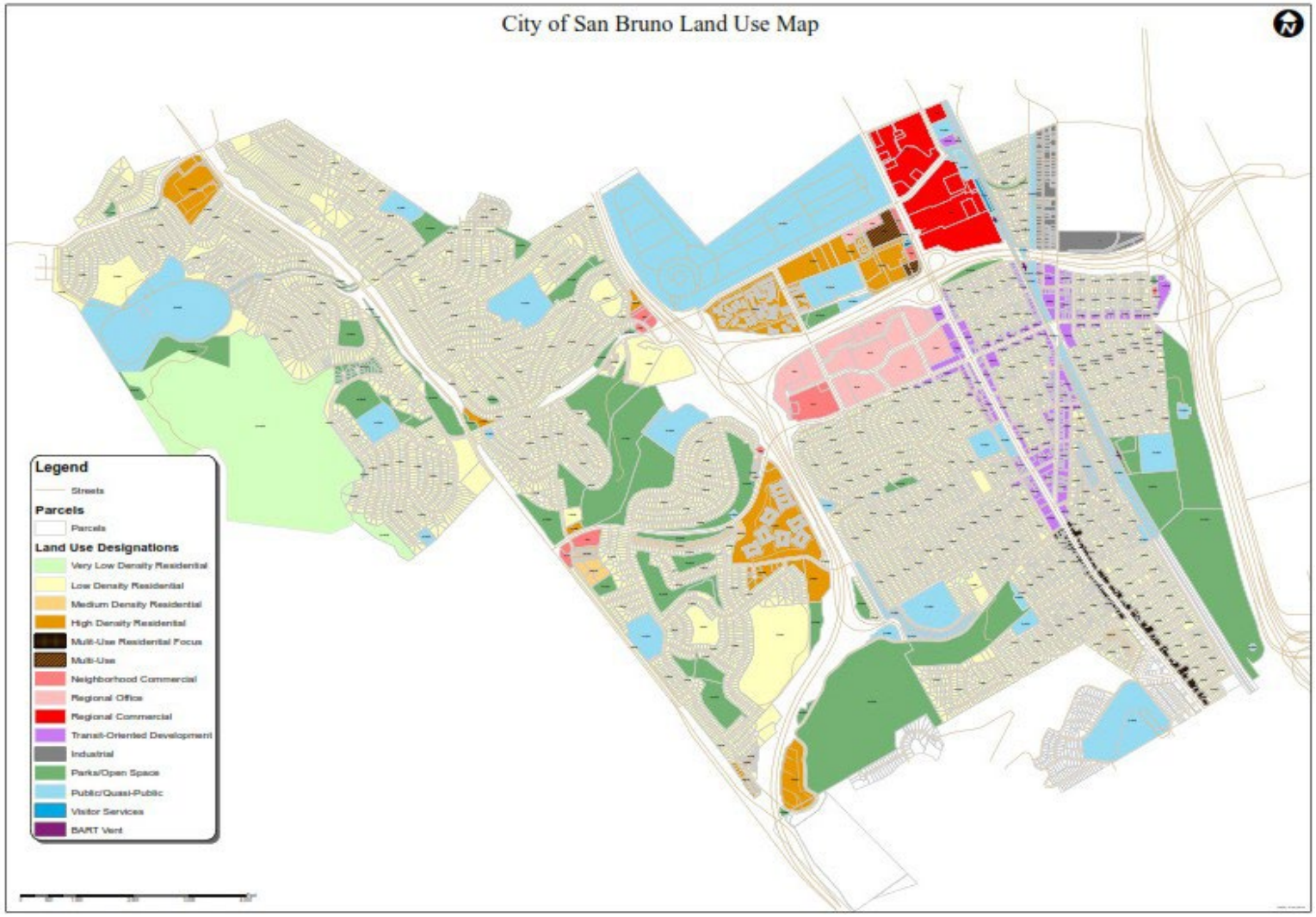


Figure 3-1 San Bruno 2025 General Plan Land Use Diagram

Source: City of San Bruno, General Plan, 2022

- **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.

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. However, because it is a developer-initiated, voluntary process, it is not expected to constrain housing development.

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.

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.

For the Housing Element, the local override will be considered by Council at the same time as the Housing Element adoption. The local override also applies to individual development projects. The override process is time consuming and must be completed if the city chooses to move forward with a housing project that has been determined to be inconsistent with the SFO ALUCP. The local agency override process involves three mandatory steps:

1. Holding a public hearing by the local agency on the proposed override action;
2. Making of specific findings by the governing body of the local agency that the proposed local action is consistent with the purposes of the airport land use commission statutes;
3. Approval of the override action by a two-thirds vote of the local agency's governing body; the override action must include adoption of the specific findings identified in Step 2, above.

The public hearing process for an override is a two-step process, which is established in Public Utilities Code Section 21676. The local agency overrule process requires two city meetings. The first meeting is to declare an intent to override which must occur at least 45 days prior to the decision by the city to overrule the inconsistency determination, as the agencies have a 30-day comment period. After the 45-day period, the city must hold a second meeting to adopt the override. In practice, the entire process adds five months and four additional meetings to the entitlement process.

Local Ordinances

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. 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 TCP area.

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 modified 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. While the City's RHNA can be accomplished with Ordinance 1284 in place, a program has been included in this Element to reflect the City's commitment to develop a ballot measure for 2028 to provide for expanded housing opportunities for future cycles. This includes amending the TCP and revising the EIR to allow for a greater number of housing units and likely greater building heights.

Short Term Rental

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. Per the city's Municipal Code, short-term rentals cannot be hosted in ADUs that were constructed after 2020.

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 four development applications (111 San Bruno Avenue, 840 San Bruno Avenue, 732 – 740 El Camino Real, and 170 San Bruno Ave.) proposing a total of 642 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. A program in this Housing Element commits the City to amending the procedures for the base density study as well as ensuring that the Density Bonus regulations are in compliance with State law.

Affordable Housing Program

Chapter 12.230 of the Zoning Code sets forth the requirements of the City's Affordable Housing Program. The purpose of the program is to encourage the development and availability of housing affordable to a broad range of households with varying income levels. All new residential projects of five or more units shall include at least 15 percent of the total units as affordable to very low-, low-, and moderate-income households as follows:

- For-Sale Units: At least fifteen percent of the total for-sale units in a residential development project shall be affordable housing units, of which five percent shall be affordable to low-income households and ten percent affordable to moderate-income households.

- Rental Units: At least fifteen of the total rental units in a residential development project shall be affordable housing units, of which five percent shall be affordable to very-low income households, five percent affordable to low-income households and five percent affordable to moderate-income households.

An in-lieu fee may be paid rather than providing onsite units which is collected into the City's Affordable Housing Fund. However, this is considered an alternative form of compliance which requires Council approval. The Affordable Housing Program is in compliance with the State Density Bonus law and is reasonable when compared to peer cities in the county. Therefore, the city's affordable housing program does not pose a constraint to development.

Zoning Regulations and Development Standards

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 3-1. Since the rezoning was completed, the City has received numerous housing development proposals.

Lot Coverage, Building Size and Allowable Density

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 applied in all residential districts. R-3 accommodates up to 24 units per acre and R-4 up to 40 units per acre.

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 and provide for "missing middle" housing. A program included in this Element commits the city to amending the R-2 District to permit two housing units on all lots within the district, regardless of lot size.

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. This requirement works to moderate unit sizes and allows for affordability by design. 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.

Most identified housing opportunity sites are in the TCP area where height limits have increased due to Measure N, which allows for increased residential densities. Also, while the TCP encourages ground floor commercial uses, residential only projects are permitted in all areas of the TCP except the C-B-D (Central Business District) where ground floor commercial is required.

TABLE 3-1A 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 3-2 below)				

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

TABLE 3-1B 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 Underground (Partially) Underground (Completely) Surface Adjacent to Street-Facing Property Line Landscaped Buffer On-Site Loading Area	Shall be located to the rear or side of buildings. May not be located between a building and a street-facing property line. May match the setbacks of the main structure. The maximum height of a parking podium is 5 ft from finished grade. No setbacks requirement. Shall accommodate installation of private utilities on private property and dedicate public utility easements, as needed. Shall be screened along the public right-of-way with a decorative wall, hedge, trellis, and/or landscaping at least 3 ft. At least 3 ft in width and 6 ft in height shall be provided for any surface parking lot abutting a residential zoning district. 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.

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, demonstrating that the City's development standards, cumulatively, do not constrain development. The TCP sites are not subject to dwelling unit density restrictions, which accounts for most of the multi-family sites. The project at 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 permitted. 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 and the City's development standards accommodate such trends.

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 3-2 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.

TABLE 3-2 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

*This includes residential uses in mixed use zones
Source: City of San Bruno Community Development Department, Zoning Ordinance, 2022.

The community development director shall determine the off-street parking requirements for a land use not listed in the parking table in the Zoning Code. 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.

In addition to the number of required parking spaces, the Zoning Code addresses setback requirements for parking areas. All residential zones have a garage setback of 20 feet from the sidewalk. The city's parking design standards require a minimum 18' setback for mechanically operated barriers to parking garages. The purpose is to get queueing vehicles off the street when entering a shared garage. These setback requirements do not unduly impact the cost of multi-family residential or mixed use residential development, as parking for these uses is not required to be covered spaces and parking areas are not counted toward the floor area calculations.

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. Furthermore, AB 2097, which eliminates minimum parking requirements for all uses located within a ½-mile of public transit, took effect on January 1, 2023.

A program in the Housing Element commits the City to reducing off-street parking requirements for residential units to the same standard as allowed under density bonus law and AB 2097. Specifically, the City commits to: Studio and 1 bedroom units to 1 space, 2 bedrooms and above to 1.5 spaces and for projects within a ½ mile of transit, consistent with AB 2097, no off-street parking shall be required.

Bicycle Parking

The city's bicycle parking requirements have proved difficult for projects to comply with and are specified in Section 12.100.050 of the code. The code requires one short-term bicycle parking space per 10 units. These are Class II bicycle parking spaces for visitors. For residents, one Class I long-term bicycle parking space is required per unit. The number of bicycle parking spaces required is within the normal range. The constraint lies with the required rack design. For short-term bicycle parking, each rack counts as one space, even though inverted U type racks can generally accommodate two bicycle parking spaces. One rack is also required for each long-term bicycle parking space. All racks must support bicycles in an upright position. These requirements, when combined with the two-foot spacing requirement, result in the need for large bike rooms for larger multi-family buildings. Applicants frequently request a concession or waiver from the bicycle parking requirements even if the project is otherwise able to comply with the number of bicycle parking spaces required. A program has been added in this Housing Element to amend the Municipal Code regarding bicycle parking requirements.

Off-Street Vehicle Loading

Off-street vehicle loading for buildings with 50 or more units is another requirement that projects need a waiver or concession from. One loading space is required for 50 – 99 units and two loading spaces are required for 100 – 199 units. Again, the number of off-street loading spaces is generally not the development constraint. The constraint is that all loading spaces must be designed so that vehicles may enter and exit an abutting street in a forward direction and have 14' of vertical clearance. This requires buildings to internally accommodate space for a loading vehicle to turn around or have separate driveways to provide through access. Most multi-family buildings are constrained for space and cannot accommodate the requirement on-site, instead opting for curbside loading spaces which require a separate discretionary approval. A program has been added in this Housing Element to amend the Municipal Code regarding off-street vehicle loading areas for large multi-family units.

Height

Maximum building heights for different residential uses are shown in Table 3-1 and 3-2 above. The R-1 and R-2 zones have a maximum height of 30 feet, while buildings in the R-3 and R-4 zones can be up to 50 feet or three stories in height, whichever is less. For the mixed use zones, building heights range from 50 feet (and three stories in the MX-R zone up to 90 feet or seven stories in the TOD-S zone. With the height limits, developments in the CBD, TOD-S, TOD-1, TOD-2 and CC zones would allow for ground floor commercial and four stories of residential. These building heights provide for a variety of residential development while still be compatible with the SFO ALUCP. Most identified housing opportunity sites are in the TCP area where height limits have increased due to Measure N. The TCP encourages ground floor commercial uses, particularly

along certain intersections. However, the zoning implementation of the TCP only requires ground level commercial in the C-B-D (Commercial Business District), which represents the downtown. One development in the C-B-D was built and have had difficulties with commercial leasing. The City has included a program in this Housing Element to amend the TCP to allow more flexibility for residential uses in the C-B-D area.

Building Stepback

Upper floor building stepbacks are required in TOD and CBD zoning districts. The table below specifies the stepback requirements in each of these districts. Density Bonus applicants often request waivers or concessions from these requirements. The intent of the rear stepback is to reduce building shadowing on adjacent low-density residential district that happens when larger building are sited next to smaller buildings. These stepbacks may provide a building constraint; therefore, the Objective Design Standard program in this Housing Element includes reviewing and revising the stepbacks requirements.

TABLE 3-3 MINIMUM STEPBACKS FOR MIXED-USE ZONING DISTRICTS

	CBD	TOD-S	TOD -1	TOD-2	CC	MX-R
Facing Corridor Street*	15 feet above 3rd story	15 feet above 4th story	15 feet above 3rd story	15 feet above 4th story	15 feet above 4th story	None
Adjacent to R-1 or R-2 District		15 feet above 3rd story		15 feet above 3rd story	15 feet above 3rd story	

*Corridor Streets include San Mateo Avenue, El Camino Real, San Bruno Avenue, and Huntington Avenue.

Cumulative Impacts of Land Use Regulations

San Bruno's development regulations include parking, building height and lot requirements that may have an impact on achieving maximum allowable density in certain residential zones. Recent developments in the City requested different standards from the Zoning Code, including lot sizes and other factors, to achieve the greatest number of residential units as possible. The following shows that the City is working on removing potential constraints to allow greater densities of development:

- *Density Bonus*: the City's current process for completing a base density study for projects within the TCP can be complicated for applicants. A program is included in this Housing Element to develop a clear process for completing base density studies for projects within the TCP utilizing a Density Bonus and to also ensure that the City's Density Bonus Ordinance is in compliance with State law.
- *Objective Design Standards*: Objective standards are generally defined by state law as standards that involve no personal or subjective judgment and that rely on a uniform benchmark or criterion available and knowable prior to application submittal. Providing more objective design standards, with flexibility, would provide a more certain entitlement structure for the development community. A program is included in this Housing Element to adopt objective design standards.
- *FAR and Unit Size:*
    - Currently, an FAR is prescribed in R-1 and R-2 districts to control building size as well as a minimum lot area per dwelling unit requirement in residential districts as an impediment to the creation of additional housing units. This creates particular issues in the R-2 zone since the lot area required only permits one unit per lot in the R-2 zone. Permitting two dwellings in the R-2 District, regardless of lot size, would make it feasible to add more housing in the district. A program is included in this Housing Element, committing the City to amend the R-2 District to permit two housing units on all lots within the district, regardless of lot size.
- *Ordinance 1284*: This ordinance 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 Housing Element includes a program proposing the following actions to the City voters (ballot measure in 2028 Election):

- Allow 2 units for any R-2 legal parcel, modify base FAR requirements for low density residential uses; and to allow existing, legal non-conforming sites to be rehabilitated, expanded, or rebuilt and maintain the non-conforming number of units.

- Amending the zoning map, applicable specific plans, and/or zoning text to allow Transit Corridor Plan regulations (particularly height and densities) to apply to the entirety of El Camino Real within the City limits.

- *Parking:* Through a Housing Element program, the City commits to reducing off-street parking requirements for residential units to the same standard as allowed under density bonus law. Specifically, the City commits to: Studio and 1 bedroom units to 1 space, 2 bedrooms and above to 1.5 spaces.

Zoning for a Variety of Housing Types

Government Code Section 65583 and 65583.2 require the housing element to provide for a variety of housing types including multifamily rental housing, factory-built housing, mobile homes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing.

The housing element must also identify a zone, or zones, where emergency shelters are a permitted use without discretionary review (Government Code Section 65583(a)(4)) and demonstrate that transitional housing and supportive housing are considered a residential use and subject to only those restrictions that apply to other residential dwellings of the same type in the same zone (Government Code Section 65583(a)(5)).

Providing development opportunities for a variety of housing types promotes diversity in housing price, style, and size, and contributes to neighborhood stability by offering more affordable and move-up homes and accommodating a diverse income mix. Table 3-4 shows which housing types are permitted in the various land use zones in San Bruno.

TABLE 3-4 PERMITTED HOUSING TYPES BY ZONING DISTRICT*

	Zoning Districts								
Housing Types	**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					
2-4 DU			P	P					
5+ DU				P	P**	P	P	P	P
Residential Care Facilities***	P	P	P	P	P**	P	P	P	P
Mobile-Home Parks	CUP	CUP	CUP	CUP					
Manufactured or Mobile 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
Emergency Shelters						P	P	P	

Source: City of San Bruno Planning, Zoning Code.* Manufactured housing units are included in the definition
** Commercial ground floor uses required
*** A licensed residential facility includes transitional and supportive housing of any size in the City of San Bruno Municipal Code.

Residential Care Facilities, Transitional Housing and Supportive Housing

California 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 by right 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 residential dwellings.

State Housing Element Law (AB745) defines transitional and supportive housing as follows:

"Supportive housing" means housing with no limit on length of stay, that is occupied by the target population and that is linked to an onsite or offsite service that assists the supportive housing resident in retaining the housing. Improving his or her health status. And maximizing his or her ability to live and when possible, work in the community.

"Transitional housing" means buildings configured as rental housing developments but operated under program requirements that require the termination of assistance and recirculating of the assisted unit to another eligible program recipient at a predetermined future point in time that shall be no less than six months from the beginning of the assistance.

"Target population" means persons with low incomes who have one or more disabilities. Including mental illness HIV or AIDS, substance abuse or other chronic health condition or individuals eligible for services provided pursuant to the Lanterman Developmental Disabilities Services Act (Division 4.5 (commencing with Section 4500) of the Welfare and Institutions Code} and may include among other populations adults, emancipated minors, families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, and homeless people.

Transitional housing and supportive housing are permitted in all zones allowing residential uses and are not subject to any restrictions (e.g. occupancy limits, requirement for minimum distances from one to another residential care facility, etc.) not imposed on similar dwellings (e.g. single-family homes, apartments) in the same zone in which the transitional housing and supportive housing is located. In addition, pursuant to Government Code section 65651, the Zoning Code will be updated to state that transitional and supportive housing is also allowed by right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses.

In the San Bruno municipal code, a "Residential care facility" includes both transitional housing and supportive housing and is defined as:

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. 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. (Ord. 1898 § 3, 2021) In the San Bruno municipal code, residential care facilities (and therefore transitional and supportive housing) of any size are allowed by right and do not require a conditional use permit in any residential zones or mixed-use zones. The City updated its Zoning Ordinance in March 2021 to ensure consistency with (Government Code Section 65583(a)(5)) which requires that transitional housing and supportive housing are permitted as a residential use and only subject to those restrictions that apply to other residential dwellings of the same type in the same zone.

A residential care facility is seen as 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. While there are no explicit requirement that would preclude a specific type of special residential care facility to be established, the Municipal Code will

be amended to permit residential care facilities where residential uses are permitted, subject to the same standards as similar uses in the same zones.

Multi Family Rental Housing

Multi-unit (three or more units) residences are allowed by right in R-3 (medium density residential) and R-4 (high density residential) zoning districts and all mixed-use zoning districts which includes the MX, TOD, and CBD zoning districts. Multi-unit residential development can be attached or detached, with typical uses including townhouses, condominiums, and apartment buildings. The maximum densities range from 8.1 – 24.0 dwelling units per acre for R-3 districts to 24.1 – 40.0 units per acre for R-4 districts. Residential uses are permitted throughout downtown in the Mixed-Use zoning districts, with no limit on maximum density. Instead, density is limited by the permitted building envelope. The CBD zoning district is located along specific streets within Downtown, and this is the only location in the City where regulations require the ground floor space to be occupied by commercial uses to enhance the pedestrian experience The project at 408-416 San Mateo Avenue is an example of a project required to have ground floor commercial space despite developer opposition, and that project has had difficulty leasing those ground-floor spaces. The building completed construction in 2019 and the ground floor commercial space remains vacant nearly four years later. Most new commercial development within the city is happening within the Bayhill Office Park and is primarily office. In conversations with a residential developer, they would prefer not to include commercial space in their high-density residential projects and when they do they consider it a loss. The City has included a program in this Housing Element to amend the TCP to allow more flexibility for residential uses in the plan area.

EXTREMELY LOW-INCOME HOUSING AND SINGLE-ROOM OCCUPANCY

Assembly Bill 2634 requires the quantification and analysis of existing and projected housing needs of extremely low-income households (see analysis in Chapter 2 of this Housing Element). 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.

A single-room occupancy (SRO) unit provides a source of affordable housing for individuals and can serve as an entry point into the housing market for people who have previously experienced homelessness. Single-room occupancy hotels and/or boarding homes are collectively referred to as SROs. SRO units are one-room units intended for occupancy by a single individual. It is distinct from a studio or efficiency unit, in that a studio is a one-room unit that must contain a kitchen and bathroom. Although SRO units are not required to have a kitchen or bathroom, many SROs have one or the other. Currently, there are no single-room occupancy units in San Bruno.

Government Code 65583(c)(1) requires local jurisdictions to specify the areas where SROs are permitted. Currently, SROs are not specifically identified as a distinct use in the San Bruno Municipal Code. Boarding homes, a similar use, are conditionally permitted in the R-3, R-4, CBD, MX-R, and TOD districts. A program in the Housing Element would require the city to amend the Zoning Code to permit SROs consistent with state law. This program will strengthen the availability of lower cost housing options for extremely low-income households.

Manufactured and Factory-Built Housing

State law limits the extent to which cities and counties can regulate the installation of manufactured 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. Pursuant to section 12.80.443 of the San Bruno Municipal Code, manufactured homes are permitted as single-family dwellings and thereby subject to the same review processes as a conventional site-built building. These standards do not impose a constraint on the placement or development of mobile homes or unreasonable cost burdens on mobile homeowners since new factory-built homes may comply with the City's requirements with little or no modification. Despite this, factory-built housing is underutilized in the city.

A mobile home park is defined as a residential development designed and developed for occupancy by mobile homes, per section 12.80.335 of the municipal code. What constitutes a mobile home is not defined. Currently, there are no mobile home parks in San Bruno. Government Code Section 65852.7 deems mobile home parks to be a permitted use in all areas planned and zoned for residential use. Mobile home parks are principally permitted in R-1 zoning districts but are not permitted in any other zoning district that allows residences. There are no specific design standards for the development of mobile home parks within San Bruno, therefore, they must comply with the Residential Design Guidelines applicable to single-family dwellings if located within R-1 or R-2 zoning districts. A program included in the Housing Plan will require the city to update its municipal code to permit mobile home parks in all zoning districts that permit residential uses.

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."

Government Code §65583(a)(4)(B) lists the operational and development standards that cities are permitted to regulate. These include security, lighting, length of stay, separation from other shelters, provision of on-site management, and parking, among others. State law (AB 139) mandates that the parking requirement imposed by cities may only be based on staffing levels of the facility, not number of occupants, and does not allow for the requirement of bicycle parking. Additionally, with the passage of AB 2339 in 2022, emergency shelters must be permitted in a zone where residential uses are permitted and if in a nonresidential zone where the city can demonstrate that the emergency shelter would be near necessary amenities and services for homeless individuals.

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. St. Bruno's is located in the TOD District within close proximity of transportation, retail, employment, and social services.

In 2015, the City amended the Municipal Code to create an Emergency Shelter Overlay which permits emergency shelters by right in a portion of the M-1 (Industrial) district. The sites in the M-1 District have mainly light industrial, auto repair, manufacturing activities that are separated from established residential neighborhoods but within proximity to transportation, retail, employment, and social services.

Chapter 12.96.205 describes the provisions of the City's Emergency Shelter Overlay in the M-1 District. The development standards outlined in the chapter are as follows:

- Maximum number of beds.
    - No emergency shelter for the homeless shall contain more than 32 beds.

- Off-street parking based upon demonstrated need.
    - Emergency shelters shall provide one parking space for each employee or volunteer on duty when the shelter is fully open to clients, plus one parking space for every three beds dedicated for family sheltering, plus 0.35 parking spaces for each dedicated non-family bed. The Community Development Director may reduce the parking requirements if the emergency shelter can demonstrate a lower parking demand.
    - The emergency shelter shall also provide 0.2 bicycle parking spaces per bed.
- Size and location of onsite waiting and intake areas.
    - The size of indoor waiting areas shall be sufficient to accommodate the expected number of clients without infringing upon the public right of way. Shelters shall provide 10 square feet of interior waiting and client intake space per bed. In addition, there shall be two offices or cubicles for shelters with fewer than 20 beds. For every additional bed there shall be an additional 0.1 office, rounded up. At least 25 percent of the offices, rounded up, shall be private. Waiting and intake areas may be used for other purposes as needed during operations of the shelter.
- Provision of onsite management.
    - Each facility shall include a written management plan that uses best practices to address homeless needs (e.g., the latest Quality Assurance Standards developed by the San Mateo County HOPE Quality Improvement Project) and subject to review and approval by the Community Development Director.
    - On site management shall be provided during the hours that the shelter is in operation. The emergency shelter provider shall submit a written operations plan that includes procedures for screening residents to ensure compatibility with services provided at the facility.
- Length of stay.
    - Temporary shelter shall be available to residents for no more than 60 days. Extensions up to a total stay of 180 days may be provided if no alternative housing is available.
- Lighting.
    - Adequate external lighting shall be provided for security purposes. The lighting shall be sufficient to provide illumination and clear visibility to all outdoor areas, with minimal spillover on adjacent properties. The lighting shall be stationary, directed away from adjacent properties and public rights-of-way, and of an intensity compatible with the neighborhood.
- Security during hours when the shelter is open.
    - On-site security. Shelters must maintain a security and emergency plan and train staff about the plan. Shelters must install an indoor/outdoor video surveillance system for security purposes. Security plans shall be submitted to City staff for review and approval prior to issuance of an occupancy permit. Security plans shall be resubmitted to City staff on an annual basis.
- Proximity to other shelters.
    - The San Bruno Emergency Shelter Ordinance does not limit proximity to other shelters.

- Hours of Operation. Clients shall only be on site and admitted to the facility between 5:00 p.m. and 10:00 a.m.
- Coordination. The shelter operator shall establish a liaison staff to coordinate with City, Police, School District officials, local businesses, and residents on issues related to the operation of the facility.
- Shelters shall have designated smoking areas that are not visible from the street.
- There shall be no space for outdoor congregating in front of the building adjacent to the street and no outdoor public telephones.
- There shall be a refuse area screened from view.

However, other residential uses are not permitted in the M-1 District and therefore, the Overlay does not comply with AB 2339. The City cannot rely solely on the Emergency Shelter Overlay in the M-1 District to meet its homeless needs.

Per Chapter 12.280.020 in the Municipal Code, emergency shelters are permitted in three of the City's mixed-use zones: TOD-S, TOD-1, and TOD-2. These zones also permit residential uses, and therefore in compliance with AB 2339. While no specific development standards for emergency shelters are outlined in these zones, a Municipal Code Amendment package adopted by the City Council in April 2024 will apply the above standards in Chapter 12.96.205 to the TOD zones. However, a program is included in this Housing Element will modify these standards to be consistent Government Code §65583(a)(4)(B) and State laws AB 139 and AB 2339 related to parking, the number of beds permitted, and other standards.

A total of six vacant lots are located in the City within these zoning designations. These sites total 2.8 acres, with an average lot size is 0.47 acre. According to the 2022 San Mateo County point-in-time count, San Bruno has an unsheltered homeless population of 63 persons. Based on the requirement of 200 square feet of space per bed, 63 beds could be accommodated in a building of approximately 12,600 square feet. The sites with this zoning designations are located near amenities and services that serve people experiencing homelessness, which may include, health care, transportation, retail, employment, and social services. There is sufficient capacity to accommodate the City's homeless should shelters be proposed.

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 is 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.

Employee and Farmworker Housing

Farmworkers are traditionally defined as people whose primary incomes are earned through permanent or seasonal agricultural labor. Farmworkers are generally considered to have special housing needs due to their limited income and the often unstable nature of their employment. In addition, farmworker households tend to have high rates of poverty, live disproportionately in housing that is in the poorest condition, have extremely high rates of overcrowding, and have low homeownership rates.

Over the past two decades, there has been a shift to a more permanent workforce for many farms, which has shifted the bulk of the need from seasonal housing for migrant workers to permanently affordable housing for low-wage working families. Farmworkers in the Bay Area generally fall under one of the following three categories.

- Permanent Residents – The majority of farmworkers are permanent residents of the County and are most likely require housing which can accommodate families.
- Migrants Farmworkers -- Migrant Farmworkers perform agricultural labor on a seasonal or temporary basis. These workers need housing in the form of single occupancy rooms, bunkhouses, or dormitory style living.
- H2A Visa Workers -- Approximately 10 percent of all workers are H2A Visa workers and they perform seasonal farm labor on a temporary basis. These are farmworkers who enter under a federal guest worker program for a limited number of months (no more than 10) before they return to their country of origin. H2A visa workers require a sponsoring employer, who provides housing, meals and transportation to the job site. H-2A visa workers can share homes, apartments or be housed in bunkhouses, dormitories, or single occupancy rooms. Since very few bunkhouses exist, the employers of H-2A workers compete with permanent farmworkers for scarce affordable homes and apartments.

According to the *San Mateo County Health Care for the Homeless and Farmworker Health Program: 2019 Needs Assessment*, there are about 80 farms in San Mateo County, the majority of which are located along the Coast. Most are owned by local residents. While San Mateo County has a smaller agricultural industry than some other Bay Area counties, it still grossed an estimated $149.2 million in 2018, according to the assessment. The main agricultural product by gross value was indoor floral and nursery crops, valued at $87.9 million in 2018. The next largest commodity type was vegetables crops – Brussels sprouts, fava beans and leeks at $28 million.

There are no known farms in San Bruno. However, according to the 2019 American Community Survey (ACS) 5-year estimates, there are 126 persons in San Bruno employed in agriculture and natural resources (the data indicate the industry in which jurisdiction residents work regardless of the location where those residents are employed). These persons work outside of San Bruno. There has been an overall decline of hired farmworkers in San Mateo County per Department of Agriculture (USDA) Agricultural Census estimates.

Farmworkers generally receive wages that are considerably lower than other jobs and are therefore, more similar to very low or extremely low-income households than traditional migrant workers. Today's farmworkers are more settled and typically live in one location, rather than following seasonal changes in crop cycles. Per the USDA, today's farmworkers can commute up to 75 miles to the workplace.

San Bruno does not have any existing employee housing on record. However, the R-1, R-1-D, R-3 and R-4 conditionally permit crop and tree farming. There are no active commercial farming operations in the City. The City is primarily urbanized and does not anticipate future commercial farming activities in these areas. As part of the Zoning Code update, this conditionally permitted use will be removed from these zones. Health and Safety Code Sections 17021.6 requires any employee housing consisting of up to 36 beds or 12 units or spaces to be deemed an agricultural use that is permitted wherever agricultural uses are permitted.

Pursuant to the California Employee Housing Act (Health and Safety Code Sections 17021.5), any employee housing providing accommodations for six or fewer employees shall be deemed a single-family structure with

a residential land use designation for the purposes of this section. For the purpose of all local ordinances, employee housing shall not be included within the definition of a boarding house, rooming house, hotel, or dormitory. Although there is a demonstrated need, San Bruno's municipal code does not define or mention farmworker or employee housing as a use. A program in this Element commits the city to revising the municipal code to permit employee housing accommodations for six or fewer employees as a permitted single-family use of the same type in the same zone across all zones that allow single-family residential uses.

Accessory Dwelling Units (ADUs)

Chapter 12.90 of the City's Municipal Code outlines the standards and requirements for Accessory Dwelling Units (ADUs) and Junior Accessory Dwelling Units (JADUs). San Bruno City Council adopted Ordinance 1898 in March 2021, to make the City's ADU Ordinance consistent with Chapter 1062 (Government Code (GC) Section 65852.2(b).). Chapter 1062 requires development applications for ADUs to be considered ministerially without discretionary review or a hearing. In order for an application to be considered ministerially, the process must apply predictable, objective, fixed, quantifiable and clear standards. These standards must be administratively applied to the application and not subject to discretionary decision-making by a legislative body. Since the adoption of Ordinance 1898, the State has passed other laws related to ADUs, including AB 2221 and SB 897, effective January 1, 2023. These laws relate to setbacks, construction of ADUs in multi-family projects and other provisions. A program in this Housing Element includes amending the Zoning Code to comply with the latest state changes.

In the City of San Bruno, ADU applications are processed through a ministerial process, without discretionary review or hearing. In addition, most ADUs were approved without any additional parking. 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 will remain relatively stable at around 30-40 units constructed per year.

Housing for Persons with Disabilities

Definition of Family

Fair housing laws prohibit restrictive definitions of family that discriminate against households based on the number, personal characteristics, or the relationship of occupants to one another. San Bruno's Municipal Code does not include a definition for "family."

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 former attributes of the property and structures; and

G. Other reasonable accommodations that may provide an equivalent level of benefit.

In approving a request for reasonable accommodation, the community development director or designee may impose conditions of approval deemed reasonable and necessary to ensure that the reasonable accommodation will comply with the findings above. The decision of the community development director or designee may be appealed to the planning commission.

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.

San Bruno must improve how it administers its reasonable accommodation process. The findings for granting a reasonable accommodation request must be more clear and objective. The discretionary wording of findings E and F, invites subjective public analysis. Furthermore, the reasonable accommodation process is not referenced on the city's website. The only way a disabled person would know about the process is having prior familiarity with the law or by knowing the municipal ordinance. Programs included in this Element . commit the city to amending its reasonable accommodation ordinance and bolstering resources for individuals seeking reasonable accommodations for fair housing.

Code Enforcement

The City's Code Enforcement Division 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 code enforcement division, in coordination with other City departments such as

Community Development, Public Works and Fire Department, 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. Programs in this Element . relate to continued Code Enforcement efforts for bringing substandard housing into compliance and enforcing on unapproved short-term rentals.

Development Review and Fees

Planning 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. Many projects also require approval by 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. Developing Objective Design Guidelines is included in the Housing Element programs.

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 Categorical Exemption, Negative Declaration or Environmental Impact Report (EIR).

Residential By Right

Pursuant to Government Code section 65583.2 (i)), by right means the jurisdiction shall not require:

- A conditional use permit.
- A planned unit development permit.
- Other discretionary, local-government review or approval that would constitute a "project" as defined in Section 21100 of the Public Resources Code (California Environmental Quality Act "CEQA").

However, if the project requires a subdivision, it is subject to all laws, including CEQA.

This does not preclude a jurisdiction from imposing objective design review standards. However, the review and approval process must remain non-discretionary, and the design review must not constitute a "project" as defined in Section 21100 of the Public Resources Code. For example, a hearing officer (e.g., zoning administrator) or other hearing body (e.g., planning commission) can review the design merits of a project and call for a project proponent to make design-related modifications, but cannot exercise judgment to reject, deny, or modify the "residential use" itself. (See McCorkle Eastside Neighborhood Group v. City of St. Helena (2019)

31 Cal.App.5th 80.) For reference, CEQA applies when a governmental agency can exercise judgment in deciding whether and how to carry out or approve a project. This makes the project "discretionary" (CEQA Guidelines, §15357.) Where the law requires a governmental agency to act on a project using fixed standards and the agency does not have authority to use its own judgment, the project is called "ministerial," and CEQA does not apply. (CEQA Guidelines, §§ 15268(a), 15369.)

Architectural Review Permit

An Architectural Review Permit is a discretionary planning permit that enables the city to ensure that new structures and additions are consistent with the General Plan, applicable specific plan goals, policies, design guidelines, and development standards, and will not be detrimental to the public health, safety, or welfare. Architectural review permits are required for all new buildings. The process requires review by the Architectural Review Committee or the Planning Commission in a public hearing, depending on project size. Below are the findings for granting an Architectural Review Permit, pursuant to Section 12.108.030 of the Municipal Code.

A. The proposed buildings, site plan, and landscaping are in substantial conformance with the goals, policies, and objective development standards of the zoning code, General Plan, and applicable specific plans.
B. The site for the proposed development is adequate in size and shape to accommodate proposed building site plan and landscaping.
C. The design of the building site plan, landscaping, and streetscape, including street trees, lighting, and street furnishings, is consistent with the character of the surrounding area, and would not create an adverse visual impact on the surrounding area.
D. The development will not be detrimental to public health, safety, or welfare.
E. The proposed development contributes to the creation of an attractive and visually interesting built environment that includes a variety of building styles and designs with well-articulated structures within a unifying context that encourages increased pedestrian activity and promotes compatibility among neighboring land uses within the same or different districts.

The Architectural Review Permit process is problematic for proposed housing projects because it is discretionary and lacks clear object criteria in the findings for granting the permit and because the City does not have objective design criteria by which to evaluate projects. The lack of objective review criteria combined with a public hearing invites subjective interpretation of project compliance that can lead to acrimony between developers and the public which can result in costly project delays. As described later in this chapter, the Architectural Review Permit process is being revised (effective July 2024), as part of a streamlining package being adopted by the City Council. This will streamline the process for housing projects in San Bruno. In addition, a program has been included in this Housing Element to revise existing standards to ensure all are Objective Design Standards, including the Mixed Use Zoning regulations of the Transit Corridor Plan (TCP). Included in this work will be a revision to the current findings for Architectural Review Permits in the Municipal Code.

For a typical single-family (infill) addition or rebuild project, required planning review ranges from two to four months and building permit review requires three weeks for the first review. A large single-family residential subdivision requires 12 to 18 months or longer for planning review, depending on the type of CEQA clearance required. Large multi-family projects generally require three to six 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 3-5 also shows the decision-making body for each application type. It should be noted that these timelines will be shortened beginning in July 2024 when the Municipal Code streamlining procedures go into effect (please see Residential Planning Process Changes (Effective July 1, 2024) below).

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 - 20 weeks	Planning Commission
Zone Change	24 - 52 weeks	City Council
General Plan Amendment	24 - 52 weeks	City Council
Tract Maps	12 - 24 weeks	Planning Commission
Final Subdivision Maps	10 - 15 weeks	City Engineer/City Council
Parcel Maps	8 - 12 weeks	Planning Commission
Negative Declaration	7 - 12 months	Planning Commission
Environmental Impact Report	12 - 20 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. It should be noted that these procedures will change beginning in July 2024 when the Municipal Code streamlining procedures go into effect (please see Residential Planning Process Changes (Effective July 1, 2024) below).

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	
Planning Staff/Architectural Review Committee	Architectural Review Committee/Planning Commission/City Council	Architectural Review Committee/Planning Commission
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. The adoption of Objective Design Guidelines, included as a program in this Housing Element, will provide consistency across all residential projects in the City and help to streamline the review process.

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.

Senate Bill 35 Project Review

Senate Bill 35 was part of a 2017, 15-bill housing package aimed at addressing the state's housing shortage and high housing costs. Specifically, it requires the availability of a Streamlined Ministerial Approval Process for developments in localities that have not yet made sufficient progress towards their allocation of the regional housing need. Eligible developments must include a specified level of affordability, be on an infill site, comply with existing residential and mixed-use general plan or zoning provisions, and comply with other requirements such as locational and demolition restrictions. The intent of the legislation is to facilitate and expedite the construction of housing. San Bruno did not make sufficient progress towards its fifth cycle RHNA and was subject to the provisions of SB 35. Accordingly, the city maintains an SB 35 application on its website and has procedures in place to review applications in a manner consistent with state law. In 2022, 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 134 affordable housing 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., to clarify design standards that are applicable to projects. A program .in this Housing Element commits the city to adopting objective design standards for all types of residential development.

Residential Planning Process Changes (Effective July 1, 2024)

Amendments within Title 12 of the Municipal Code to further streamline the planning process are going before the City Council in March 2024 and would be effective July 1, 2024. Below summarizes some of the proposed streamlining measures:

- The *Architectural Review Committee* is being removed. This means one less hearing body that a housing project must go through.
- *Single-family home review:* this process is being revised. Currently one or two hearings are required for most new single-family homes and many types of additions require a use permit despite adhering to zoning regulations. Proposed streamlining changes will:
  - Remove the use permit requirements
  - If a new home complies with zoning, no planning permit will be required
  - New homes or additions that request minor variation from the regulations will be administrative actions with adjacent noticing. Those that request significant variation will remain a PC action with 300' noticing. The levels of variation are specifically defined in the Municipal Code
- Planned Use Permits that propose a parcel map will be administrative hearings rather than going before the Planning Commission.

These changes will further streamline the process for housing in the City and helps to remove planning constraints. As part of this Housing Element, a program has been added to examine a ministerial review process for multi-family housing as well as a program to revise and adjust existing standards into fully Objective Design Standards.

Building Review Process

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.

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.

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 in this Element has been added to improve staff coordination to assist in prioritizing water and wastewater infrastructure improvements where it benefits residential development the most.

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.

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.

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

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.

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 $15,000 to $150,000 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 $150,000 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) and for public noticing (. 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).

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 in this Element commits the City to starting this outreach.

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, Statues 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.

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.

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.
- **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.

Market and Other Non-Governmental Constraints

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

Land Availability and Costs

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.

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 and FAR for sites 20,000 square feet or larger within the TCP area, which encourages lot consolidation.

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. As mentioned above, San Bruno has very little unconstrained vacant land on which new housing can be constructed. An online survey conducted in January 2024 found a few vacant parcels zoned for residential use in San Bruno and nearby communities within the County. Two vacant lots (5,000 sq. ft. each) sold in September 2022 for $450,000 each at 116 San Marco Ave. in San Bruno. Two lots in Brisbane were listed for $498,000 (2,525 square feet) and $600,000 (6,534 square feet). A 1.52 acre lot in Belmont was listed for $1,250,000.[37]

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. Program 18 in the Housing Element would commit the city to addressing the issue of displacement of lower income residents.

37 www.redfin.com. Accessed on January 24, 2024.

Construction Costs

Construction costs can be broken down into two primary categories: materials and labor. Construction costs have a significant impact on the cost of new housing. According to the Association of Bay Area Governments (ABAG), wood frame construction at 20 to 30 units per acre is generally the most cost-efficient method of residential development. However, the limited land availability in San Bruno impacts the economic feasibility of construction types. The COVID-19 pandemic also disrupted the supply chain and impacted the costs of construction materials.

One indicator of construction costs is Building Valuation Data, compiled by the International Code Council (ICC). The unit costs compiled by the ICC include structural, electrical, plumbing, and mechanical work, in addition to interior finish and normal site preparation. The data are national and do not account for regional differences nor include the price of the land upon which the building is built. Building Valuation Data, dated February 2021, reports the national average for development costs per square foot for apartments and single-family homes as follows[38] :

- Type I or II, R-2 Residential Multi-family: $157.74 to $179.04 per square foot
- Type V Wood Frame, R-2 Residential Multi-family: $120.47 to $125.18 per square foot
- Type V Wood Frame, R-3 Residential One- and Two-Family Dwelling: $130.58 to $138.79 per square foot
- R-4 Residential Care/Assisted Living Facilities generally range between $152.25 to $211.58 per square foot

Additionally, labor costs are influenced by the availability of workers and prevailing wages. State law requires payment of prevailing wages for most many private projects constructed under an agreement with a public agency that provides assistance. As a result, the prevailing wage requirement substantially increases the cost of affordable housing construction. In addition, a statewide shortage of construction workers can impact the availability and cost of labor to complete housing projects. This shortage may be further exacerbated by limitations and restrictions due to the COVID-19 pandemic.

A report in 2020 by the Terner Center for Housing Innovation at UC Berkeley found that materials and labor (also referred to as hard construction costs) accounted for approximately 63 % of total development costs for multi-family projects in California between 2010 and 2019. [39] The report also found that controlling for project characteristics, compared to the rest of the state, average materials and labor costs were $81 more expensive per square foot in the Bay Area. The Bay Area has comparatively higher construction wages than elsewhere in California. 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.

One way to lower construction costs is the number of units that can be developed at a single site which allows for reductions in building costs through economies of scale. This cost reduction is particularly beneficial when coupled with density bonuses which allow for more units than would be permitted according to the existing zoning. The density bonus serves as an incentive to the private developer to construct affordable housing. Pursuant to State law, the City of San Bruno offers density bonus and other regulatory incentives to developers that include affordable housing within the development.

38 https://cdn-web.iccsafe.org/wp-content/uploads/BVD-BSJ-FEB21.pdf

39 The Hard Costs of Construction: Recent Trends in Labor and Materials Costs for Apartment Buildings in California, Terner Center for Housing Innovation. March 2020.

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.

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.

Timing and 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 permitted. 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. This trend shows that the market is supporting projects at the highest density permitted.

Non-governmental constraints can impact the timing between when a project receives approval and when the developer pulls building permits to begin project construction. These constraints may include the time it takes to secure construction financing, securing contractors, and changes in the housing market after project approval.

There are a few different scenarios to describe building permit issuance in San Bruno following a planning approval.

1. Due to the economy, some projects are waiting to submit building permits until there are more positive signs from the economy. Applicants ask for planning permit extensions to extend the entitlement period as long as possible (Mills Park).
2. Prior to submitting building permits, the entitled project was determined to be too costly to construct. Applicant may or may not resubmit planning entitlement application for a denser project (271 El Camino Real, Glenview Terrace).

3. Development partnership fell apart prior to building permit submittal (111 San Bruno Ave.). Applicant has resubmitted a planning entitlement application for a denser project.
4. Some projects ask to submit permits prior to planning entitlement or submit shortly after entitlement. If a final map is required and it has already been approved, then building permit review and issuance is fairly routine. For instance, a building permit for 732-740 El Camino Real was submitted in December 2022 and approved May 2023 after four rounds of review. A building permit for 406-418 San Mateo was submitted February 2016 and the permit was issued September 2016. Based on these projects, it is taking 5-6 months for review once a building permit is submitted. Offsite utilities can sometimes take some time to reconcile.
5. A common thread among projects that fail to materialize is that the developers behind them are often inexperienced, having never built a project before (Mills Park, Glenview Terrace, 111 San Bruno Ave., 271 El Camino Real, 500 Sylvan).

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.

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.

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.

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.

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.

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.

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.

RHNA Strategy and Sites Inventory

The Village At The Crossing, City of San Bruno

This chapter describes San Bruno's strategy for meeting its RHNA, as required by Government Code Sections 65583(a)(3), 65583(c)(1), and 65583.2. This chapter also includes 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 are provided at the end of the Chapter.

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.

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 percent) 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 percent of total). Commercial and industrial/ auto-related land uses make up approximately 8 percent and 2 percent of San Bruno's net land area, respectively. Public and quasi-public land uses make up approximately 20 percent 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 percent of the city's net land area. Around two percent of the city's net land area is vacant land and surface parking lots.

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 adopted the plan in 2013 and completed the Zoning Code update to establish the mixed-use zoning standards for the area and new development standards in March 2021.

Availability of Land to Meet Remaining RHNA

Government Code Section 65583.2(c) requires a local jurisdiction to determine its realistic capacity for new housing by means of a parcel-level analysis of land with the potential to accommodate residential uses. The analysis must take into account physical and regulatory constraints, including: lot area and configuration, environmental factors, allowable density, and other development standards such as setbacks, parking requirements, and height limitations. This list of properties that result from this analysis is often referred to as a sites inventory.

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 will need to rezone properties to accommodate its RHNA. 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 the planning cycle to determine if the rate and density of development is consistent with our projections and make adjustments as necessary.

Based on the current General Plan, Zoning Code, objective criteria, and local knowledge, the City has identified sites with adequate capacity to meet the remaining RHNA target. Most of the units can be accommodated in San Bruno's transit corridors which 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.

San Bruno's Transit Corridors Plan (TCP) was adopted in 2013 to facilitate 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. Within the TCP, one higher density residential project has been built, another is under construction, and several are under review.

The TCP envisions mixed-use projects to be residential above retail uses, however the plan does allow 100 percent 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.

The San Bruno 2025 General Plan (adopted in 2009) 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 expanded the TOD land-use 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.

Because the City rezoned the Transit Corridors Plan area several years after the plan was adopted, the plan was not fully utilized during most of the 5th cycle RHNA. Since the rezoning, there has been strong developer interest in investing in residential development within the TCP. Therefore, the City took an "TCP infill first" approach to identifying appropriate sites for housing. 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.

The TOD-1, TOD-2, C-N, C-B-D, and P-D zoning districts represent the best opportunities for housing near transit, 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, development proposals approved 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.

Housing Opportunities on Former School Sites

Former school sites available for residential reuse within San Bruno include the former Edgemont School, former Willard Engvall School, and former Crestmoor High School sites. These former school sites represent opportunities for redevelopment in lower density, higher resource neighborhoods that are not in the TOD districts or major corridors. The former school sites require no zoning changes prior to redevelopment with lower density residential use. The realistic development capacity of these sites is 4-8 units per acre, depending on site topography, and because they are designated Low-Density Residential under the General Plan and Zoning (a maximum of eight units to the acre).

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 Sites inventory.

RHNA Strategy

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 for the sixth cycle is 3,165 units, as shown in Table 4-1. This represents a significant increase from the previous cycle which was 1,155 units.

TABLE 4-1 SAN BRUNO'S RHNA BY INCOME CATEGORY

Income Category	6th Cycle RHNA
Very Low (up to 50% AMI)	704
Low (51% to 80% AMI)	405
Moderate (81% to 120% of AMI)	573
Above-Moderate (greater than 120% of AMI)	1,483
Total	3,165

Note: AMI = Median Income
Source: Association of Bay Area Governments (ABAG)

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 percent to 30 percent more capacity than required, especially for capacity to accommodate the lower- income RHNA.

Table 4-2 summarizes the City's strategy for meeting its RHNA and providing a substantial buffer for lower and moderate-income units, by realistically accommodating 3,682 units through credits (potential ADUs and entitled/approved/under construction projects) and sites inventory (sites with pending projects, remaining 5th Cycle sites, and newly identified sites). The 6th Cycle Sites Inventory provides sufficient units in the Lower, Moderate and Total categories, with ample buffers. HCD encourages buffers between 15 and 30 percent and the Sites Inventory has a 30.7 percent buffer for lower income units and a 44.4 percent buffer for moderate income units, when compared to the remaining RHNA after credits.

TABLE 4-2 SUMMARY TABLE OF RHNA STRATEGY

	Income Categories				
	Extremely Low/Very Low	Low	Moderate	Above Moderate	Total
RHNA	704	405	573	1,483	3,165
Credits	121	528	94	387	1,130
Potential ADUs	67	67	67	23	224
Entitled/Approved/Under Construction	54	461	27	364	906
Remaining RHNA (as of February 2024)	583	(123)[1]	479	1,096	2,158
6th Cycle Sites Inventory[2]	**762**		**690**	**1,100**	**2,552**
Sites with Pending Projects	28		14	258	300
Re-use of 5th Cycle Sites	165		242	16	423
New Sites - No Rezone	365		365	0	730
Total Capacity w/o Rezone	558		621	274	1,453
Shortfall	25		0	822	847
New Sites - Rezone	204		69	826	1,099
Cover Shortfall?	Yes		Yes	Yes	
Buffer (6th Cycle Sites – Remaining RHNA)	**179**		**211**	**4**	**394**
% Buffer	**30.7%**		**44.1%**	**0.4%**	**18.3%**

1. Excess Credits in one income category cannot be applied to reduce the number of Remaining RHNA units in another income category. While the City technically has 123 more low-income units as credits than the RHNA requires, that figure is not used to calculate the total Remaining RHNA or Buffer.
2. Includes Sites with Pending Projects, Re-Use 5th Cycle Sites, New Sites- No Rezone, and New Sites- Rezone.
Source: City of San Bruno, 2024

Credits Toward RHNA

In planning to accommodate RHNA, state law allows jurisdictions to count projected ADUs and approved projects towards their RHNA allocation as credits. A summary of the credits proposed for the sixth cycle are shown above in Table 4-2, and will be described below.

Potential Accessory Dwelling Units

Accessory dwelling units (ADUs) and junior accessory dwelling units (JADUs) are ancillary dwelling units located on the same lot as a primary dwelling unit. Standards for ADUs are established in Chapter 12.90 of the Zoning Code. ADUs are an important housing type in San Bruno because they can be more affordable than full-size units, they provide access to existing residential neighborhoods, and they provide supplemental income for residential property owners. To comply with AB 1866, 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. San Bruno's zoning code allows ADUs on all lots with existing or proposed single family or multifamily dwellings.

State law allows potential future accessory dwelling unit production to be used to satisfy RHNA. 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 four years (2019- 2022), as specified in its annual progress report. As shown in Table 4-3, San Bruno issued permits for an average of 28 ADUs per year, even though the two most recent years of over forty ADUs per year. Projecting forward, the City bases its ADU production on the "safe harbor" option provided by HCD. Using this methodology, it is estimated San Bruno will permit 224 ADUs over the eight-year planning period.

TABLE 4-3 ADU PERMITS ISSUED 2019-2022

Year	Permits Issued
2019	17
2020	7
2021	41
2022*	47
Total	112
Average	28

Source: City of San Bruno 2023

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 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. 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 and 2022 numbers as a result of the streamlined process. State ADU legislation will likely continue to change over the course of the planning period requiring the City to stay abreast of changes and update its ADU ordinance to remain in compliance with state law. With Program 4, the City commits to amending its ADU ordinance as necessary to be consistent with state law.

In a memo dated September 8, 2021, the Association of Bay Area Governments (ABAG) issued guidance on ADU affordability in the Bay Area region, based on a 2020 report by the Center for Community Innovation at the University of California at Berkeley and concluded that in most jurisdictions the following ADU affordability assumptions are applicable (30 percent Very Low, 30 percent Low, 30 percent Moderate, and 10 percent above moderate). San Bruno is choosing to use this methodology for projecting ADU income-categories.

TABLE 4-4 ADU AFFORDABILITY ASSUMPTIONS

Income Category	ABAG Affordability Percentage	Projected ADUs
Very Low	30%	67
Low	30%	67
Moderate	30%	67
Above Moderate	10%	23
Total	100%	224

Source: City of San Bruno 2023

The ADU affordability breakdown for the 224 ADUs projected in the planning period is listed in Table 4-4.

To promote ADU production, Programs 1 and 4 commits the city to developing a proactive ADU outreach campaign, an amnesty program, and financial incentives for deed restricted ADUs in high resource neighborhoods. Program 4 also commits the city to annually updating its ADU ordinance for consistency with changes to state law and to evaluating its ADU progress in the 3rd and 6th years of the planning period to determine if additional incentives are necessary to achieve overall RHNA projections.

Some housing advocates believe the City should not use the ABAG ADU affordability assumptions, and instead do detailed surveys and monitoring for ADUs. With Program 11, the city commits to annually monitoring ADU affordability to determine if they are consistent with the city's affordability projections.

Approved, Entitled, and Under Construction Projects

RHNA projection period for the ABAG region began on June 30, 2022. Therefore, approved, entitled, and under construction projects that will be available during the planning period can be credited against the City's RHNA. Projects that fall into this category are included in the RHNA as credits. The list of approved projects in included in Table 4-5 below.

The City has five approved projects consisting of 906 units (54 Very Low, 461 Low, 27 Moderate, and 364 Above Moderate), that are expected to be constructed during the 6th planning period.

- The largest approved project is called Mills Park. This is a 427-unit mixed-use development on El Camino Real, with 64 affordable units. The project was approved in June 2020, and is subject to a development agreement which the property owner and City extended in 2022.
- The 732-740 El Camino Real project is a 134-unit, 100 percent affordable housing project that is currently under construction on a formerly vacant vehicle sales lot. This project utilized SB 35 and included a Density Bonus.

- The 840 San Bruno Ave W is a 10-story, multi-family development consisting of 341 residential units. The project will be 100 percent affordable with 337 low income units and 4 manager's units which are considered Moderate income non-deed restricted.
- For the two low-density projects, unit affordability is consistent with the City's reporting methodology that single-family dwellings will be above-moderate income units, unless the units are income-restricted. The associated ADUs are conservatively estimated to be moderate-income.

TABLE 4-5 APPROVED PROJECTS

Project Name/ Address	APN	Status	Anticipated Completion	Type	Acres	DU/Ac	Income Category				
							Very Low	Low	Mod	Above Mod	Units
Mills Park	020-075-080, -090, -100, -110, etc.	Approved June 2020 with extended development agreement in 2022	DA extended from 10 to 12 years	Multi-Family (Ownership)	5.4	79	26	19	20	362	427
732-740 El Camino Real	020-126-060, -080	Approved June 2022, Under Construction	Under Construction	Multi-Family (Rental)	0.6	224	28	105	1	0	134
840 San Bruno Ave W	020-017-050	Approved April 2023	Will file permits July 2024 - seeking issuance before end of 2024	Multi-Family (Rental)	1.57	217	0	337	4	0	341
116 San Marco	021-172-120, -130	Approved April 2023	Permit anticipated April 2024	Single-Family and ADU	0.5	8	0	0	2	2	4
						Total Approved Units	**54**	**461**	**27**	**364**	**906**

Source: City of San Bruno 2023

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 Terner 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. In part because of parcel sizes and footprints of existing homes, San Bruno does not believe there will be many units constructed pursuant to SB 9. Therefore, SB 9 units are not considered as part of the strategy for meeting RHNA. Included in the Housing Element is Program 10 to adopt implementing ordinances to facilitate SB 9 compliance.

Sites Inventory

Based on the RHNA and credits described above, sites must be identified for the remaining RHNA, as shown in Table 4-6:

TABLE 4-6 REMAINING RHNA FOR SITES INVENTORY

	Income Categories				
	Extremely Low/ Very Low	Low	Moderate	Above Moderate	Total
RHNA	704	405	573	1,483	3,165
Credits	121	528	94	387	1,130
Approved Projects	54	461	27	364	906
ADUs	67	67	67	23	224
Remaining RHNA	583	0[1]	479	1,096	2,158

1. While the City technically has 123 more low-income units as credits than the RHNA requires, 0 is used in this income category to calculate the total Remaining RHNA because excess credits in one income category cannot reduce the number of Remaining RHNA units in another income category.
Source: City of San Bruno 2023

San Bruno developed a Sites Inventory of 21 sites[40] (made up of 47 parcels) for the Remaining RHNA, as shown in Figure 4-1 below. The remainder of this section will introduce the sites, describe the criteria for determining realistic capacity, affordability levels, and then a detailed analysis of the sites on the inventory.

40 In this analysis, a "site" is defined as either a singular parcel or a combination of parcels organized by location for descriptive purposes. With the exception of Site #8, all sites are composed of parcels owned by the same entity. Site #8, on the other hand, consists of 13 parcels, nine of which are owned by the same entity. For further information on the inventory of sites and parcels, please consult the **Analysis of Sites Inventory** section.

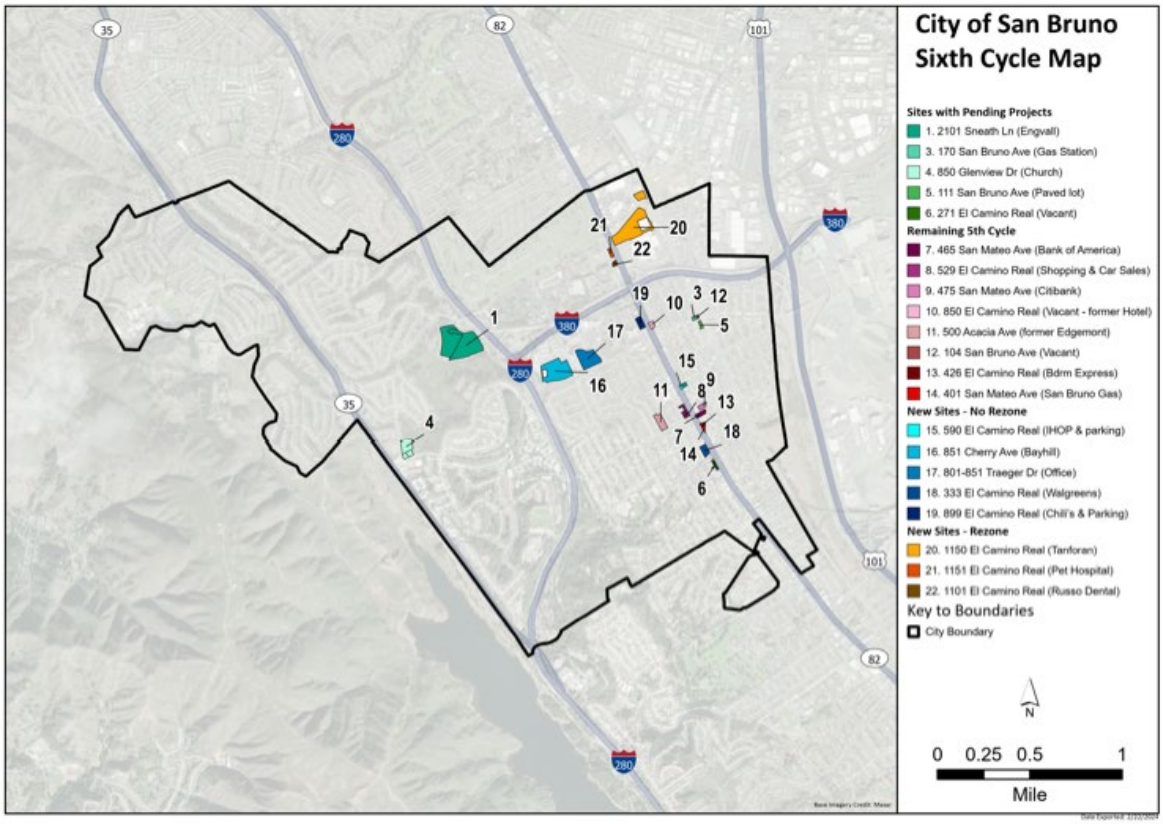


Figure 4-1 Map of Sites Inventory

Note: Site 2 (840 San Bruno Ave) was removed from the Sites Inventory because the project was entitled between the January 2023 adoption of the Housing Element and the August 2024 amended Housing Element. Units from 840 San Bruno Ave are now reflected as a Credit in the Entitled/Approved/Under Construction Projects category.

Source: City of San Bruno 2024

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.

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.

The housing sites include both vacant and nonvacant land with the potential for additional housing during the 6th Housing Element cycle. Sites with existing housing were not considered because property owners had little incentive to redevelop them in such a tight housing market. The observed redevelopment trend was for single-use commercial properties containing uses on the decline to redevelop more quickly.

Assumptions For Determining Realistic Capacity

There are many requirements for what sites can qualify as a housing site, at what density that site can accommodate, and what affordability levels those units can be projected as. This section will describe those criteria. The analysis of the affordability distribution is in a later section.

Government Code Section 65583.2(c) requires the calculation of projected residential development capacity of the sites identified in the housing element that can be realistically achieved. This site capacity can be modified through one of two options:

1. Considerations of existing development trends; approved residential developments at similar affordability levels in the jurisdiction; the cumulative impact of development standards (such as lot coverage, height, open space requirements, parking, and floor-to-area ratio or FAR); and infrastructure availability.
2. Minimum density requirements that explicitly prohibit residential development below minimum density on a given site.

San Bruno's capacity projections are based on option #1. Below are the recommended approaches for applying option #1. For sites located in TOD districts which do not have density limitations, capacity was calculated based on typical densities of pending, approved, and built developments adjusted based on historic trends for the site type. For projects located outside TOD districts capacity projections were based on submitted applications or similar projects in the same zoning district. Exceptions are noted in the individual site descriptions.

Redevelopment Trends and Interest

While San Bruno has a history of entitling high-density residential projects in the TCP that exceed 100 units per acre, the realistic capacity assumption allows consideration for unique site constraints, and for consideration that some vacant commercial buildings might remain commercial instead of being redeveloped. However, most of the residential projects currently under review in the city are using state density bonus law to increase dwelling unit density.

Although single-use commercial buildings are permitted in the TCP, there is very little market in San Bruno for site redevelopment with totally new commercial buildings. There has been only one commercial project, 841 San Bruno Ave. (dialysis center), that was built in the last decade within the TCP. A hotel was entitled for 160 El Camino Real for the MX-R District but the entitled site is currently for sale with little developer interest for the entitled hotel. The TCP envisions a walkable transit-oriented neighborhood with ground floor commercial uses along San Mateo Avenue and at key intersections, but the market for ground floor commercial space within new mixed-use buildings is not very desirable to developers. In the past, the City has required ground floor commercial space despite developer opposition. The project at 408-416 San Mateo Avenue is an example of the declining market for ground floor commercial space in mixed-use buildings. The City required ground floor commercial space because it is located in the city's central business district. The building completed

construction in 2019 and the ground floor commercial space remains vacant nearly four years later. Most new commercial development within the city is happening within the Bayhill Office Park and is primarily office. In conversations with a particular residential developer, they would prefer not to include commercial space in their high-density residential projects and when they do they consider it a loss.

Neighborhoods on the west side of the city are lower density and further removed from high quality transit. Development opportunities identified in these neighborhoods are primarily the result of institutional uses, such as schools and churches, that have closed. As discussed in the constraints section, neighborhoods adjacent to Skyline Blvd. (CA. State Route 35) are impacted by the San Andreas Fault, which limits residential development within the Alquist-Priolo zone. Most of these neighborhoods have a Low-Density Residential land-use designation which allows up to 8.0 dwelling units per acre, which promotes the development of single-family subdivisions. Past development trends have indicated that due to site topography, most of these sites cannot achieve the maximum density with the 5,000 sq. ft. lot that is required by the Zoning Code. All of the recently approved single-family subdivisions in these neighborhoods have had to rely on reduced lot sizes and reduced development standards to achieve maximum density.

Due to the city's land constraints, all future development will be infill and reuse of underutilized sites, including some that are smaller than a half-acre. San Bruno has a strong track record of entitling residential projects on sites smaller than one-half acre to facilitate new residential projects. Development standards continue to support assembling multiple small sites for larger residential development projects, but San Bruno has a mixed track record for projects involving lot consolidation. Sites that require significant property assemblage have proven difficult to achieve when there are multiple property owners involved because development partnerships have been difficult to arrange and sustain. Successful sites created by assembling multiple small parcels are those held under the same ownership, either through long standing ownership or via an intentional assembly of sites over time. Mills Park is a successful example of this type of property assemblage.

There are no density controls within the Transit Corridors Plan area. Recent development trends suggest that residential density for development within the TCP is much higher than the City anticipated in the previous planning period. Housing densities for projects approved within the TCP has ranged from a low of 53 dwelling units per acre for the 500 Sylvan Avenue project, which was not located on a corridor street, to a high of 224 dwelling units per acre with state and local incentives for the 732–740 El Camino Real project.

In mixed-use districts located outside the TCP, the maximum permitted density is 40 units per acre. This density applies to sites along El Camino Real in the MX-R District (Multi-Use, Residential Focus), south of the TCP. Density is lower in the MX-R District because it is more than a half mile from San Bruno's Caltrain Station.

Realistic Capacity for TOD Sites Less than One-Half Acre

San Bruno's TOD zoning has no density limits. This Housing Element utilizes a realistic capacity of 100 dwelling units per acre for sites less than a half-acre. Research found 16 projects in transit-oriented districts locally and in nearby jurisdictions. Sites averaged 0.27 acres in size and yielded 33 units on average. 201-219 Grand Ave. in South San Francisco was omitted from the calculations as an outlier but is shown in Table 4-7 below for reference only. Density ranged from 99 to 167 dwelling units per acre, with an average density of 124 dwelling units per acre. In fact, the average density achieved in San Bruno is higher than the countywide average (129 units per acre in two sites, and even larger in a non-vacant site, 145 units per acre). The City is using the larger sample including the countywide trend for its realistic capacity assumptions. San Bruno estimates conservatively that some sites will not be able to develop at the countywide average density due to site specific constraints such as sites that have multiple street frontages allowing more opportunities for sunlight exposure versus sites that have only one street frontage.

Taking this into account, the average density of 124 dwelling units per acre was discounted 20 percent to a realistic capacity of 100 dwelling units per acre. The 100 dwelling units per acre assumption is still 45 percent smaller than the densities achieved in underutilized sites alone in San Bruno.

TABLE 4-7 DENSITY ACHIEVED ON COUNTY-WIDE TOD PROJECTS ON LESS THAN ONE-HALF-ACRE SITES

Address	City	APN	Year	Acreage	Total Units	DU/Ac	Status	Existing/Former Use
900 El Camino Real	Belmont		2022	0.30	37	123	Under Review	Vacant service station
128 Lorton Ave.	Burlingame	029-231-210	2020	0.17	19	110	Entitled	4 residential units
619-625 California Dr.	Burlingame	029-131-140, -050, -060	2021	0.45	44	99	Entitled	Commercial
601 California Dr.	Burlingame	029-131-380	2020	0.24	26	108	Entitled	Vacant gas station
300 El Camino Real	Millbrae	024-154-240	2021	0.12	14	117	Under Review	Commercial
230 Broadway	Millbrae		2022	0.05	5	100	Under Review	Commercial
130-140 El Camino Real	Millbrae		2022	0.23	30	130	Under Review	Commercial
612 Jefferson St.	Redwood City	052-347-080	2020	0.11	20	182	Built	Commercial
170 San Bruno Ave.	**San Bruno**	**020-111-160**	**2022**	**0.29**	**42**	**145**	**Under Review**	**Commercial**
111 San Bruno Ave.	**San Bruno**	**020-121-360**	**2022**	**0.41**	**46**	**112**	**Under Review**	**Vacant Site**
817 Walnut St.	San Carlos	050-163-190	2019	0.24	24	99	Built	Commercial
626 Walnut St.	San Carlos	050-131-060, -070, -080	2020	0.25	35	139	Entitled	Commercial
428-432 Baden	South SF	012-321-170	2020	0.32	36	113	Entitled	Vacant residential
418 Linden Ave.	South SF	012-314-010	2022	0.32	37	116	Under Construction	Commercial
*201-219 Grand Ave.**	*South SF*	*012-316-080*	*2022*	*0.46*	*476*	*1,027*	*Under Construction*	*Vacant*
201 Baden and 199 Airport Blvd.	South SF	012-335-100	2020	0.49	82	167	Under Review	Commercial
Average				**0.27**	**33**	**124**		
Non-Vacant Average				**0.25**	**32**	**126**		
San Bruno Average				**0.35**	**44**	**129**		
San Bruno Average (non-vacant)				**0.29**	**42**	**145**		

Notes: *Site is an outlier and was not included in the average.
Source: City of San Bruno 2023

Realistic Capacity for Sites Greater than One-Half Acre

This Housing Element utilizes a realistic capacity of 100 dwelling units per acre for sites greater than a half-acre. For TOD sites from a half-acre to 10 acres in size, research found 18 sites locally and in nearby jurisdictions, as shown in Table 4-8. Sites averaged 2.4 acres in size and yielded 304 units on average. Density ranged from 79 to 220 dwelling units per acre, with an average density of 141 dwelling units per acre. Average densities achieved in San similar to those achieved Countywide. In all TOD sites, the average density was 151 units per acre and 128 units per acre in underutilized sites. These achieved densities are similar enough to justify using the larger countywide sample for realistic capacity assumptions. San Bruno estimates conservatively that some sites will not be able to develop at this density due to unique site-specific constraints, or decisions to include mixed-use commercial in some projects. Taking this into account, the average density of 141 dwelling units per acre was discounted 40 percent to a realistic capacity of 100 dwelling units per acre. The 100 dwelling units per acre assumption is still 30 percent smaller than the densities achieved in underutilized sites alone in San Bruno.

TABLE 4-8 DENSITY ACHIEVED ON TOD PROJECTS ON SITES GREATER THAN A HALF-ACRE

Address	City	APN	Year	Acreage	Total Units	DU/Ac	Status	Existing/Former Use
1301 Broadway	Millbrae	021-276-330	2019	0.67	99	148	Under Review	Commercial
1100 El Camino Real	Millbrae	021-324-290, -300	2019	4.35	376	86	Entitled	Residential
959 El Camino Real	Millbrae	021-364-080	2021	1.8	278	154	Entitled	Commercial
150 Serra Ave	Millbrae		2022	3.6	488	136	Entitled	Commercial
300 Millbrae Building 6A	Millbrae		2022	0.54	79	146	Entitled	Parking Lot
300 Millbrae Building 5B	Millbrae		2022	2.68	320	119	Entitled	Parking Lot
406-418 San Mateo Ave.	**San Bruno**	**020-364-320**	**2019**	**0.93**	**83**	**89**	**Built**	**Commercial**
601-799 El Camino Real/Mills Park Center	**San Bruno**	**020-072-030, -040, -050, -060**	**2020**	**5.38**	**427**	**79**	**Entitled**	**Commercial**
732-740 El Camino Real	**San Bruno**	**020-126-160**	**2021**	**0.61**	**134**	**220**	**Under Construction**	**Vacant**
840 San Bruno Ave West	**San Bruno**	**020-017-050**	**2023**	**1.57**	**341**	**217**	**Entitled**	**Commercial**
1051 Mission Rd.	South SF	093-312-050, -060	2020	5.9	800	136	Entitled	Vacant
200 Airport Blvd	South SF	012-338-050	2021	0.55	94	171	Under Construction	Commercial/ Industrial
100 Produce Ave & 124 Airport Blvd	South SF	015-113-180	2020	4.12	480	117	Entitled	Commercial
40 Airport Blvd	South SF	015-126-010	2020	1.63	292	179	Entitled	Commercial
1477 Huntington	South SF	014-184-999	2021	1.98	262	132	Under Review	Commercial
988 El Camino Real	South SF	014-011-260	2019	1.67	172	103	Built	Commercial
7 S Linden Ave	South SF	014-074-010	2022	4.22	558	132	Under Review	Industrial
405 Cypress Ave	South SF	012-314-100	2022	1.09	195	179	Under Construction	Vacant
Average				**2.4**	**304**	**141**		
Non-Vacant Average				**2.4**	**290**	**134**		
San Bruno Average				**2.1**	**246**	**151**		
San Bruno Average (non-vacant)				**2.6**	**284**	**128**		

Source: City of San Bruno 2023

Detailed descriptions for the San Bruno projects in Table 4-7 and Table 4-8 are found in the Factors for Selection of Non-Vacant Sites section in pages HE TBR 4-16.

Project Base Densities and Exceptions

All recent projects in the TCP took advantage of the State Density Bonus Law to increase residential density. However, even without Density Bonus Law waivers/exemptions, most projects could achieve at least 100 units per acre. The City requires base density studies based on its zoning standards when requesting a density bonus for projects in the TCP since the TCP does not have density controls. Table 4-9 demonstrates that recent

projects in San Bruno achieve a base density of at least 100 units per acre without the density bonus. The base density at 111 San Bruno Ave was lower than 100 units per acre due to the project's diverse unit mix, which exceeds that of most smaller projects. The 46-unit project includes the following mix of unit types: 10 studios (550-804 s.f.), 14 one-bedrooms (728-1,088 s.f.), 21 two-bedrooms (1,010-1,810 s.f.), and one three bedroom (2,234 s.f.).

TABLE 4-9 SAN BRUNO TOD PROJECT BASE DENSITIES AND EXCEPTIONS

Address	APN	Year	Acreage	Total Units	DU/Ac	Existing/ Former Use	Base Density	Exceptions
170 San Bruno Ave.	020-111-160	2022	0.29	42	145	Commercial	Base Density is 29 units (100 du/ac) 96.25% density bonus	FAR, Building Height, Number of Floors, Setback, Stepback, Short- and Long-term Bike Parking, Vehicle Queueing Space
111 San Bruno Ave.	020-121-360	2022	0.41	46	112	Vacant Site	Base Density is 31 units (75 du/ac) 50% density bonus	FAR, Setback, Stepback, Bike Parking, Motorcycle Parking, Vehicle Queueing Space
732-740 El Camino Real	020-126-160	2021	0.61	134	220	Vacant	Base Density is 96 units (157 du/ac) 40% density bonus	Number of floors, Height, Stepback, Open Space, Bike Parking, Loading Space, Parking (SB35)
840 San Bruno West	020-071-050	2023	1.57	341	217	Commercial	Base Density is 190 units (121 du/ac) 80% density bonus	Number of floors, Height, Stepback, Open Space, Short- and Long-Bike Parking, Parking (AB2097)

Table 4-9 also lists the project exceptions granted to projects. The exceptions included:

- Floor to Area Ratio (FAR): Parcels less than 20,000 square feet have a 2.0 FAR maximum, over 20,000 square feet have no FAR max. This is considered a constraint and is addressed in Program 10e.
- Heights/Floors: 65-70 feet, 5 stories max. Requests to exceed height are generally those with significantly higher percentage of affordable units. The allowed heights are not considered a constraint to achieve the projected densities of the Sites Inventory.
- Setback: The Code requires a 10'-0" average setback from the property with a 5'-0" minimum. Projects that have requested relief from the requirement have no setback or meet a 5'-0" minimum. Requiring a 10'-0" average setback is considered a constraint and is addressed in Program 10e.
- Stepback: 15 foot stepback above 3rd or 4th story depending on adjacencies. Requiring this amount of a stepback is considered a constraint and is addressed in Program 10e.
- Open space: 40 square feet per unit (combined for private and public). 732 El Camino Real proposed 23 square feet of open space per housing unit and 840 San Bruno West proposed 26 square feet of open space per housing unit. Only the projects proposing over 200 units per acre as 100% affordable projects did not meet this requirement, therefore this is not considered a constraint for achieving the projected densities of the Sites Inventory.

- Bike parking: Short-term 1 space per 10 units, long term 1 space per unit. Bike parking, particularly the spacing requirements between stalls, is considered a constraint and is addressed in Program 10a.
- Motorcycle parking: One area for every 26-100 automobile parking spaces; 1 additional area for every additional 100 spaces. Motorcycle parking is not required for projects with 25 parking spaces or less. The requirement was an issue only for 111 San Bruno Ave, and therefore is not considered a constraint to achieve the projected densities of the Sites Inventory.
- Vehicle parking: The code requires one parking space per unit for studios and one-bedroom units, two parking spaces per unit for units with two or more bedrooms, and one guest parking space for every ten units. 840 San Bruno Ave. utilized AB 2097, and 732 El Camino Real utilized SB 35 (Government Code Section 65913.4(e)(1)) to remove minimum parking standards for projects near transit. With Program 10a, the city commits to amending the parking standards to align with State Density Bonus Law.
- Vehicle queueing space: The code requires the garage entrance to be setback from the property line far enough (20') to allow an entering vehicle to get out of traffic. This waiver was used for two smaller projects, and could have been redesigned to meet this regulation without reducing the project size, therefore this regulation is not considered a constraint. Also, this requirement mitigates impacts on pedestrian, bicycle and vehicular traffic around the housing project, and not having the queueing space would be detrimental to the mobility priorities.
- Vehicle loading space: Space provided must have 14' of height clearance and sufficient maneuvering area so that vehicles may enter and exit an abutting street in a forward direction. The vehicle loading requirement is important to provide residents with delivery opportunities enjoyed by other neighborhoods, but with the change in size of vehicles, the height and maneuvering area can be considered a constraint and is addressed in Program 10a.

Sites Inventory Affordability Assumptions

Projecting the income categories of the units reflected in the Sites Inventory requires assumptions. The Housing Element utilizes four categories of project types for affordability assumptions:

1. For sites that have a pending or conceptual project under review, the income categories of the actual project application are utilized;
2. Sites with a parcel size over 0.5 acres and less than 10 acres, where the allowed density exceeds 30 du/ac, are considered feasible by State law for lower-income housing. In this Housing Element, the City is conservatively allocating 50 percent of the units on these sites to lower income and 50 percent to moderate income. This projection is considered conservative because the City has two active housing projects underway on sites that fall into this category that are 100 percent lower-income units, and those projects happen to be twice the density (200+ units per acre) than the 100 units per acre assumption the City is using for these sites.
3. Sites with a parcel that allows densities greater than 30 du/ac with a size under 0.5 acres (small site) or greater than 10 acres (large site) require additional analysis to show they are suitable for lower income units. In this Housing Element, the City is allocating 100 percent of the units on small sites to moderate income. Two sites over 10 acres are in the Sites Inventory, and both have a proposed or conceptual project under review which is therefore classified under affordability assumption #1; and
4. Sites that allow less than 30 du/ac are allocating 100 percent to above-moderate income units.

These assumptions are consistent with HCD guidance and reflect a conservative approach. The income categories of the units in the Sites Inventory are based on these four criteria, and more details are provided in the Analysis of the Sites Inventory section.

Factors for Selection of Non-Vacant Sites

Government Code Section 65583.2(g)(2) requires that the City analyze the extent to which existing uses may constitute an impediment to site redevelopment within the Planning period because it is relying on non-vacant sites to accommodate more than 50 percent of the RHNA for lower-income households. Of the City's remaining lower income RHNA of 583 units (see Table 4-2), only 50 units (8.6 percent) can be accommodated on vacant sites. Nonvacant sites are used to accommodate the remaining 93 percent of remaining lower income RHNA. The analysis must include past experience in converting existing uses to higher density residential development, market trends and conditions, and regulatory or other incentives to encourage redevelopment.

Development trends in San Bruno indicate sites are more likely to redevelop when buildings are vacant, the improvements on the site are obsolete, or when there is an active use that hasn't had any significant recent investment. Other factors for redevelopment include underutilized sites that are similar in character to other sites that have development proposals that were either approved or under review by the City.

TABLE 4-10 RHNA UNIT DISTRIBUTION BY SITE TYPE

Site Type	Low		Mod		AM		Total	
	#	%	#	%	#	%	#	%
Underutilized	712	93%	632	92%	950	86%	2,294	90%
Vacant	50	7%	58	8%	150	14%	258	10%
Total Units	762		690		1,100		2,552	

Development trends in San Bruno point towards the TCP where properties have a TOD designation and mixed uses are allowed. The TCP envisioned mixed-use buildings along the commercial corridors, but the plan only specifies commercial uses at key intersections. Developers have had difficulty finding tenants for new ground floor commercial space in mixed use buildings and generally prefer to provide none or minimal amounts of commercial space unless they have already partnered with a high-quality commercial tenant. Furthermore, many of the sites in the inventory are too small to accommodate the parking for new commercial development. There has been only one wholly commercial building (841 San Bruno Ave.) constructed in the TCP since its adoption in February 2013. 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.

The San Bruno Housing Element will rely on nonvacant sites to accommodate 50 percent or more of their RHNA for lower income units, which requires findings based on substantial evidence that uses will likely be discontinued during the 2023-2031 planning period. Additionally, the Housing Element must describe:

- The realistic potential of each site
- The extent that the existing uses impede additional residential development,
- The jurisdiction's past experience converting existing uses to higher-density residential development
- Region-wide market trends and conditions
- Regulatory or other incentives or standards that encourage additional housing development on nonvacant sites.

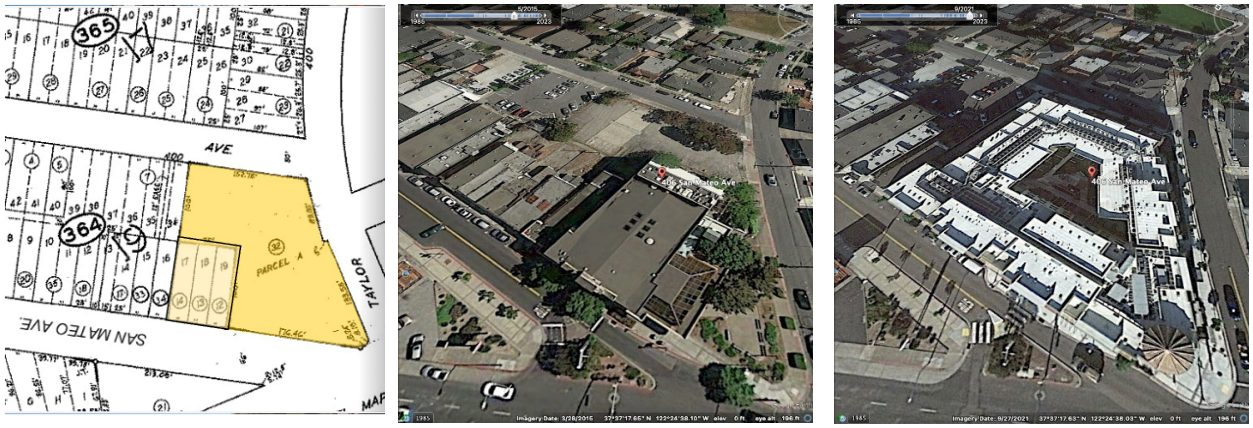
The following section elaborates on the redevelopment trends within the City and the San Francisco Peninsula, focusing on nonvacant sites.

Built Projects

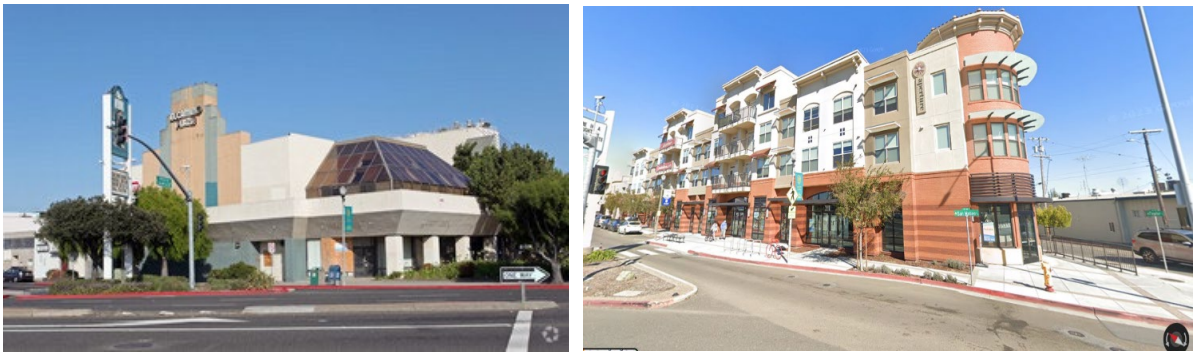
406-418 San Mateo Avenue – The 406-418 San Mateo Avenue project consolidated four parcels (APN: 020-364-320, 020-361-120, 020-364-130, 020-364-140) into a single 0.93 acre lot. The parcels were zoned Central Business District (C-B-D) and are located within the Transit Corridors Plan (TCP) area. The property consisted of four lots that were developed with existing structures and a parking lot. The largest lot was developed with the former El Camino Theater building, and a parking lot to the rear. The three adjoining lots to the north were developed with single story commercial structures that were formerly occupied as restaurants or bars. The existing structures were demolished and replaced with new mixed-use 3-story building with 83 apartments, 7,000 square feet of ground floor retail and underground garage. The project was completed in 2019 and achieved a density of 89 units per acre.

Due to limited assessor's parcel data, not all characteristics are available but overall lot coverage on the combined parcels was 47 percent. The new FAR is 2.33. Parcel land values also exceeded improvement values (i.e. improvement to land value (ILV) ratios were less than one). The theater was built in 1930 and closed around 1974 and went over to retail use. The ages of the surrounding structures are unknown, but according to Google Earth imaging, they have been standing since at least 1993. The two commercial buildings north of the project were built in 1939 and 1993 respectively. Considering their visual appearance and local knowledge, it is likely that these structures have existed since at least 1993.

Figure 4-2 406 San Mateo Avenue Project



Left: Parcel map of project area (yellow area). Center: Aerial view of existing conditions in 2015. Right: Aerial view of redeveloped project.



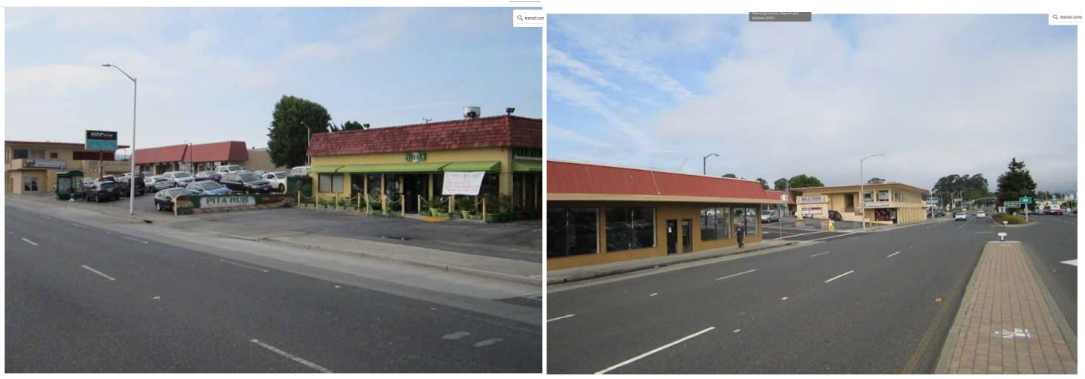
Left: Previous conditions at 406-418 San Mateo Avenue Project. Right: Completed three-story mixed-use building at 406-418 San Mateo Avenue.

Approved Projects

Mills Park Center – The Mills Park Center project consists of the demolition of all structures on the site, and the development two (2) one to five-story, 70-foot tall, mixed-use buildings with a total of 427 residential condominiums units with 65 affordable units and approximately 7,947 square feet of ground floor commercial space. The development site consists of 27 parcels zoned commercial (C) in the Transit Corridors Plan (TCP) area. The development site measures 5.38 acres in total area (inclusive of the roads Camino Plaza and White Way, see Figure 4-3), achieving a density of 79 units per acre. The majority of the site is developed with the Mills Park Center, a retail shopping center with 45 tenant spaces in 110,000 square-feet of floor area. There are several surface parking lots scattered throughout the shopping center that provide a total of 80 parking spaces. Also included within the development site is a vehicle sales lot located just south of the shopping center and the commercial buildings located at 601 and 611 El Camino Real. The project would require the merger of the 27 parcels into two lots. Total building square footage would amount to 908,820 gross square feet, which corresponds to a 3.88 FAR. The Mills Park Center on the northern end of the project area has the largest variety of structures interspersed with parking. Most structures are one-story and lot coverage ranges from 11 percent to 96 percent. On the southern part of the project site, the majority of the parcels along Linden Ave are parking and most of the area along El Camino Real is vehicle storage. Land values also exceeded improvement values in most parcels. ILV averaged 0.56 for the project though it was above 1.0 for six of the parcels. The age of structures was only available for three of the structures in the project site which were built between 1945 and 1951. Google Earth images show that the structures have been in place since at least 1993. Based on visual examination and local knowledge, most of the structures within the project area are at least 30 years old.

Figure 4-3 Mills Park Center Development

Left: Project Site. Right: Building A and B- Perspective from El Camino Real and Kains Avenue



Left: Mills Park Center looking southwest from intersection of El Camino Real and San Bruno Ave. W. Right: Mills Park Center looking northwest from intersection of El Camino Real and Kains Avenue.

732-740 El Camino Real – The 732-740 El Camino Real project proposes to construct a six-story, residential building on a 0.612 acre site that was formerly a Toyota dealership lot. A total of 134 rental units will be distributed between floor 2 through floor 6, achieving a density of 134 units per acre. The project merged two parcels (APN 020-126-160 and 020-126-080) into a single site (APN 020-126-21). The project only covers the lot, not the dealership building (shown in Figure 4-4). Land values exceeded the improvement values in both parcels of the site (ILV ratio was 0.23 and 0.03, respectively). The proposed project has a development FAR of 2.3.

Figure 4-4 732-740 El Camino Real

Left: Proposed development on 732 El Camino Real. Right: Existing conditions as of August 2022. Vacant auto dealership.

840 San Bruno West – The applicant proposes to demolish the existing vacant AT&T building structure in a parcel (APN:020-017-050) and construct a new 10-story, high multi-family residential development with 341 residential dwelling units, and 115 total parking spaces. 100 percent of the units provided on-site would be affordable. The project achieved a density of 217 units per acre.

The property is approximately 1.57 acres in area and is located on the northeast corner of San Bruno Avenue and Elm Avenue in the Transit Oriented Development zoning district (TOD-2). The site is currently developed with a vacant, two-story commercial building that was previously occupied by AT&T, with surface parking to the west, north, and east of the building. The structure covers about 27 percent of the lot. ILV ratio was not available since the improvement value listed at the property is zero. While the age the structure was built is not available, Google Earth images show the building has existed since at least 1993 and the building is at least 30 years old.

Figure 4-5 840 San Bruno West

Top left: Project location aerial view. Top right: Street view of building. Bottom: Project rendering

Pending Projects[41]

Pending projects can also provide insight into the redevelopment trends within the city, as they demonstrate the types of properties and projects that developers find feasible. These projects are considered part of the Sixth Cycle Sites Inventory.

2101 Sneath Lane – The project proposes to demolish the existing San Bruno Golf Center, parking, and San Bruno Park School District maintenance building, and other improvements and construct 118 single-family residential homes and related improvements (see below). The structure covers about two percent of the parcel. The year the structure was built is not available, but Google Earth images show the structure was there since at least 1993 and is at least 30 years old.

Figure 4-6 2101 Sneath Lane

Left: Site existing conditions. Right: Proposed development.

[41] Pending projects are also referred to as projects In Review.

170 San Bruno Ave W – The applicant proposes to demolish the existing vacant gas station structure, and construct in its place a new six-story mixed-use development consisting of 42 residential dwelling units (condominiums or apartments), approximately 970 square feet of ground floor commercial space, and a subgrade garage with 36 parking spaces. The project achieved a density of 145 units per acre.

The subject property is approximately 0.29 acres in area and is located on the northeast corner of San Bruno Avenue and Mills Avenue, which is approximately 200 feet from the San Bruno Caltrain Station. The site was previously used as a gasoline station with a structure surrounded by asphalt/concrete paving, with limited landscaping located along the western property line. The structure was demolished in 2022 but the paved parking remains in use as a vehicle. The property is currently zoned TOD-1 (Medium Density Mixed-Use). Lot coverage is only 17 percent of the site. The age of the structure is unknown but Google Earth images show the structure in 1993 making the structure at least 30 years old.

Figure 4-7 170 San Bruno Avenue W

Top left: Project location aerial view. Top right: Street view of building. Bottom: Project rendering.

850 Glenview Drive – The proposed project is comprised of three parcels (APN: 019-042-150, 019-042-160, and 019-042-170), totaling 3.28-acres, on the corner of San Bruno Avenue and Glenview Drive, which 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. Land value exceeded improvement values in all parcels. The parsonage structure was constructed in 1990 and is at least 30 years old. Lot coverage on the non-vacant parcel is eight percent.

Figure 4-8 850 Glenview Drive

Top left: Project location aerial view. Top right: Street view of church and adjacent vacant lot on Glenview Dr. Bottom: Project rendering.

111 San Bruno Avenue – The project developer proposes the construction of a 5-story, mixed-use development located at 111 San Bruno Avenue West, consisting of 46 residential units and approximately 2,670 square feet of ground floor commercial space. The project achieved a density of 112 units per acre. The project site is currently zoned P-D and is within the Transit Corridor Plan area. The site had a structure that was formerly a National City Bank branch that was constructed in 1971 and paved parking area. The structure was demolished in 2018. The site is currently considered a vacant lot with an ILV ratio of 0 (land value exceeds improvement value).

Figure 4-9 111 San Bruno Avenue

Top left: Project location aerial view. Top right: Street view of church and adjacent vacant lot on Glenview Dr. Bottom: Project rendering.

Characteristics of Redevelopment Projects

Redevelopment trends in the San Bruno indicate a trend towards residential and mixed-use developments. Former commercial spaces with existing uses such as restaurants, bars, auto shops, and other retail uses, are being converted into residential mixed-use spaces. Additionally, parking lots and buildings with large surface parking are also being repurposed for residential purposes. These sites often have small lot coverage, ranging from zero percent in parking lots to 96 percent in parcels with commercial buildings in shopping strips. Most of the redeveloped sites are also one story, though there are two projects that would demolish two-story buildings. Overall, most of the buildings are over 30 years old. Due to the old age of buildings and lack of improvements, land values exceed improvement values in most parcels being redeveloped. This transformation reflects a strategic effort to meet the growing demand for housing in urban areas and repurpose underutilized spaces for residential purposes. Table 4-11 shows the detailed characteristics of the parcels in San Bruno's redevelopment projects described in this section.

TABLE 4-11 REDEVELOPMENT PROJECTS IN SAN BRUNO

Status	Development Name	APN	Size (Acres)	Achieved Density (du/ac)	Age	ILV	Lot Cov.	Stories	Existing use	Lot Cons.
Built	406-418 San Mateo Avenue	020-364-320	0.93	89	1930	0.00	47%	1	El Camino Theater	Yes-different owners†
		020-361-120			Pre-1993			1	Commercial- restaurant/bar	
		020-364-130			Pre-1993	0.01		1	Commercial - restaurant/bar	
		020-364-140			Pre-1993	0.01		1	Commercial- restaurant/bar	
Approved	Mills Park, Camino Plaza	020-072-030	0.30	79	Pre-1993	0.54	76%	1	Gym	Yes-different owners†
		020-072-040	0.10		Pre-1993	0.05	10%		Parking + bldg	
		020-072-050	0.12		Pre-1993	1.52	86%	1	Strip retail bldg	
		020-072-060	0.12		Pre-1993	1.02	95%	1	Restaurant	
		020-072-070	0.19		1946	1.10	89%	1	Mlt retail- restaurant, pizza, beauty	
		020-072-320	0.28		Pre-1993	0.89	54%	1	Restaurant	
		020-075-080	0.09		Pre-1993	1.00	0%	0	Parking	
		020-075-090	0.18		Pre-1993	2.22	96%	2	Office/retail blg	
		020-075-100	0.19		Pre-1993	0.05	0%	0	Parking	
		020-075-110	0.18		Pre-1993	0.55	11%	1	Florist	
		020-076-090	0.10		Pre-1993	~~0.07~~	0%	0	Parking	
		020-076-100	0.10		Pre-1993	0.07	0%	0	Parking	
		020-076-110	0.10		Pre-1993	0.07	0%	0	Parking	
		020-076-120	0.10		Pre-1993	0.07	0%	0	Parking	
		020-076-130	0.10		Pre-1993	0.09	0%	0	Parking	
		020-076-160	0.10		Pre-1993	0.82	0%	0	Parking	
		020-076-200	0.22		Pre-1993	0.05	0%	0	Parking lot	
		020-076-220	0.23		Pre-1993	0.12	0%	0	Parking lot	
		020-076-230	0.31		Pre-1993	0.01	13%	1	Auto shop	
		020-076-240	0.21		1951	0.04	34%	0	Auto	
		020-076-250	0.13		Pre-1993	3.94	56%	1	Auto dealer office (vacant)	
		020-076-260	0.19		Pre-1993	0.60	67%	1	Tobacco shop	
		020-096-050	0.10		Pre-1993	0.09	0%	0	Parking	
		020-096-060	0.10		Pre-1993	0.07	0%	0	Parking	
		020-096-070	0.10		Pre-1993	0.07	0%	0	Parking	
		020-096-080	0.10		Pre-1993	0.07	0%	0	Parking	
		020-096-090	0.42		1945	0.07	69%	1	Furniture	
Approved	732-740 El Camino Real	020-126-160	0.612	220	Pre-1993	0.23	0%	0	Dealership lot	Yes-same owner
		020-126-080			Pre-1993	0.03		0	Dealership lot	
Approved	840 San Bruno Ave	020-071-050	1.57	217	Pre-1993	0.00	27%	2	Vacant blg and paved lot (former AT&T)	No
In Review	2101 Sneath Ln	019-270-260	8.32	6	Pre-1993	N/A	2%	1	Paved parking/storage	Yes- Same owner
		019-270-270	10.82		Pre-1993	N/A	0%	0	Vacant	

Status	Development Name	APN	Size (Acres)	Achieved Density (du/ac)	Age	ILV	Lot Cov.	Stories	Existing use	Lot Cons.
In Review	170 San Bruno Ave	020-111-160	0.29	145	Pre-1993	0.00	17%	1	Paved parking with structure††	No
In Review	850 Glenview Dr	019-042-150	0.48	17	Pre-1993	0.00	0%	0	Vacant church area	Yes-Same owner
		019-042-160	0.60		Pre-1993	0.00	0%	0	Vacant church area	
		019-042-170	2.20		Pre-1993	0.01	8%	0	Church, paved, some vacant	
In Review	111 San Bruno Ave	020-121-360	0.41	112	Pre-1993	0.00	0%	0	Vacant (structure demolished)	No
					Average	0.41	23%	-		
					Min	0	0	-		
					Max	3.94	96%	-		

† Parcels were under separate ownership but the developer purchased the adjacent sites prior to application submittal. †† Structure was demolished in 2022 but paved area remains in use as vehicle storage.

The City also performed an analysis of redevelopment trends on non-vacant sites in the San Francisco Peninsula area.[42] Millbrae, South San Francisco, and San Carlos noted that a most of the proposed developments in the City are conversions from commercial to residential or mixed-use over the past 10 to 15 years. In Millbrae, 40 percent of their approved units are mixed-use or residential developments in non-vacant commercial sites. Specifically, Millbrae noted that 100 percent of affordable developments in the city have been built on sites with previous retail, commercial, industrial, and office uses. In South San Francisco, nearly every residential project that has been constructed since 2013 has been on underperforming or underdevelopment commercial properties (hospitality, office, restaurant, and industrial/warehouse) within the Downtown area.

While only San Mateo listed parcel characteristics such as ILV, age of buildings, FAR, and number of stories for its recent projects, narrative trends described in the cities' Sixth Cycle Housing Elements describe redevelopment on existing structures that are single or two story buildings, at least thirty years old, with on-site parking that monopolizes the site (Table 4-12).

TABLE 4-12 REDEVELOPMENT PROJECTS- SAN FRANCISCO PENINSULA

City	Status	Name	APN	Acres	Existing Use	ILV	Age	FAR	Stories
San Mateo	Entitled	406 E 3rd Ave. Mixed-Use	N/A	0.88	Fast food restaurant and industrial & auto uses	0.8	1990s	0.9	1
San Mateo	Entitled	1919 O'Farrell St. Multi-Family	N/A	0.71	Office	0.0	N/A	0.1	1
San Mateo	Entitled	303 Baldwin Ave. Mixed Use	N/A	0.93	Grocery store	0.3	1956	0.4	1
San Mateo	Entitled	1650 S. Delaware St. Multi-Family	N/A	1.07	Office	0.3	Before the 1980s	0.4	2
San Mateo	Entitled	480 E 4th Ave. (Kiku Crossing) Multi-Family	N/A	2.41	Two public parking lots	0.0	No Building	0.0	0
San Mateo	Entitled	2988 Campus Dr. Multi-Family	N/A	15.45	Offices	0.3	1970s	0.3	3
San Mateo	Entitled	666 Concar Dr. Mixed-Use	N/A	14.51	Regional retail	2.6	1969 - 1991	0.3	1
San Mateo	Entitled	1 Hayward Ave Mixed-Use	N/A	0.29	Residential and office	0.1	1938	0.4	1
San Mateo	Entitled	222 E 4th Ave. (Draegers) Mixed-Use	N/A	1.13	Grocery store	0.8	1997	1.3	2
San Mateo	Entitled	Block 21 Mixed Use	N/A	1.51	Retail and residential structures (8 units)	0.4	1900 - 2002	0.5	3
San Mateo	Entitled	401 Concar Dr. Hayward Park Mixed Use	N/A	2.82	Caltrain parking lot	0.0	No Building	0.0	1
San Mateo	Entitled	4 W Santa Inez Ave.Multi-Family	N/A	0.25	2 single-family dwellings	0.1	1950s	0.3	1
San Mateo	Entitled	1, 2 and 3 Waters Park Dr. Multi-Family	N/A	11.13	Executive business park	0.4	1979	0.3	1

42 The City reviewed the most recently published Sixth Cycle Housing Elements posted as of January 2024 for the cities of Millbrae, South San Francisco, Burlingame, San Carlos, and San Mateo.

City	Status	Name	APN	Acres	Existing Use	ILV	Age	FAR	Stories
San Mateo	Entitled	435 E. 3rd Ave. Mixed Use	N/A	0.25	Gas station	0.1	1980s	0.1	0
Detailed information on pre-exising characteristics of sites for the following projects is not available									
Millbrae	In Review	300 El Camino Real	024-154-240	0.12	Restaurant	4.93			
Millbrae	Entitled	480 El Camino Real	021-314-100	0.12	Surface parking lot	0.0			
Millbrae	In Review	1301 Broadway	021-276-330	0.67	One story dental office	0.02			
Millbrae	Approved	El Rancho Inn Redevelopment	021-324-290	4.35	Motel	2.32			
Millbrae	Approved	El Rancho Inn Redevelopment	021-324-300	4.35	Motel				
Millbrae	Approved	959 El Camino Real	021-364-080	1.80	Existing commercial building/office depot	1.95			
Millbrae	In Review	230 Broadway		0.05	2 story comm building	0.33			
South San Francisco	In Review	455-463 GRAND	012-305-070	0.32	Parking+ vacant medical center	3.65			
South San Francisco	In Review	Bertolucci's Redevelopment	012-314-070	0.58	Restaurant +parking lot	0.03			
South San Francisco	In Review	Bertolucci's Redevelopment	012-314-080	0.58	Restaurant +parking lot	0.03			
South San Francisco	In Review	Bertolucci's Redevelopment	012-314-090	0.58	Restaurant +parking lot	1.70			
South San Francisco	Under Construction	201-219 Grand Ave	012-316-080	0.46	Parking lot + restaurant	1.28			
Burlingame	Entitled	619-625 California Dr.	029-131-140	0.45	Commercial-auto shop	0.17			
Burlingame	Entitled	619-625 California Dr.	029-131-050	0.45	Commercial- auto shop	N/A			
Burlingame	Entitled	619-625 California Dr.	029-131-060	0.45	Commercial- auto shop parking	3.33			
Burlingame	Entitled	601 California Dr.	029-131-380	0.24	Vacant gas station	0.13			
Redwood City	Built	612 Jefferson St.	052-347-080	0.11	Commercial-auto and parking	0.00			
					Average	0.90	1968	0.38	
					Min	0.00	1938	0.00	
					Max	4.93	1997	1.30	

Redevelopment projects in neighboring cities are being proposed, entitled, and built on commercial properties with existing uses such a retail/shopping center, banks, office, gas station and auto-related, restaurant, and motel. This variety of existing uses is similar sites in San Bruno. Market demand for these uses has decreased and these uses are showing further signs of underutilization after the pandemic.

Firstly, the rise of online shopping has led to a decrease in demand for traditional retail spaces. This trend is evident in projects such as the Mill Park Center in San Bruno and 959 El Camino Real, 230 Broadway, and 150 Serra Ave in Millbrae. According to the Kidder Mathews Retail Market Trends Report, vacancy rates in the Peninsula/San Mateo area have increased from 1.8 percent in Q3 2019 to 4.9 percent in Q3 2023. Specifically, restaurant foot traffic is decreasing. As CNN Business puts it, dining out is on the decline as inflation makes dining out more expensive resulting in a decline in restaurant visits.[43] Vacancy rates are even higher for office uses. The increase in remote work and hybrid work models has reduced the need for traditional office spaces. The Kidder Matthews Office Market Trend reports that office vacancy rates in Millbrae/San Bruno have increased from 1.8 percent in Q3 2019 to 13.5 percent in Q3 2023.

The adoption of eBanking has prompted banks to consolidate their local branches, a trend highlighted by recent reports indicating a growing number of closures. Bank of America, for example, is strategically pursuing new markets while simultaneously closing existing branches to streamline operations. [44] For every new branch it opens, two existing ones will close. Chase and Wells Fargo have also closed a large number of branches. As of June 2023, Chase had 500 fewer total branches than it did six years ago. Wells Fargo announced the closing 17 branch offices nationwide in May 2023 and an additional dozen in January 2024.[45]

Advancements in vehicle technology, such as improved fuel efficiency and the popularity of hybrid and electric cars, have also contributed to a decrease in demand for auto-related services. Examples of redevelopment on sites with gas station and related uses include Mills Park Center and 732-740 El Camino Real in San Bruno as well as 435 E. 3rd Ave. in San Mateo and 619-625 California Dr. in Burlingame. Finally, the widespread use of virtual meetings and the rising popularity of alternative accommodations like Airbnbs have decreased business travel and impacted demand for traditional hotel accommodations, particularly affecting older motels.

Lot Consolidation

As seen in Table 4-11, lot consolidation is not a constraint to development. Five of the eight recently built, approved, or pending projects required lot consolidation of parcels with similar and different ownership. The Sites Inventory was developed based on a conservative assumption that lot consolidation would primarily occur if parcels were under the same ownership, or that the majority of parcels had the same ownership with remaining parcels containing underutilized uses (such as surface parking). Site #8 (529 El Camino Real) is the only site in the inventory which requires lot consolidation of parcels under different property ownership. The City still considered lot consolidation possible since the four parcels with different ownership have shared road/parking access with adjacent parcels which have the same owner. It is unlikely that the existing use would remain if the surrounding parcels are redeveloped.

Lot consolidation remains encouraged, and Program 7 will establish fee reductions or waivers for housing projects. Sites with different ownership or uses that had been assumed to consolidate in past cycles have been included in the 6th cycle as separate development sites.

43 CNN. November 15, 2022. https://www.cnn.com/2022/11/15/business/restaurant-sales-traffic/index.html

44 Bankingdive.com, June 14, 2023. https://www.bankingdive.com/news/bank-of-america-7-new-markets-retail-banking/652981/

45 Original.newsbreak.com. May 15, 2023. https://original.newsbreak.com/@joel-eisenberg-561469/3025511794492-17-u-s-wells-fargo-bank-branches-announced-as-permanently-closing. Bestlifeonline.com. February 8, 2024. https://bestlifeonline.com/bank-of-america-wells-fargo-closing-branches-news/

Sites Identified in Multiple Planning Periods

If a nonvacant site was used in a prior housing element sites inventory and include lower income housing units, then the element must include a program in the housing element requiring rezoning of the site 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. The same requirements apply to vacant sites that were included in two or more consecutive planning periods. Program 9 of the Housing Element will establish a ministerial review process for all properties on the sites inventory that meet the projected density, thereby exceeding the minimum requirements of the law as it relates to by right housing projects on reused sites.

Criteria for Selection of Non-Vacant Sites

Since San Bruno is built-out with few vacant sites, the majority of the Sites Inventory are non-vacant sites. However, this will not be an impediment to development as the type of sites used for the inventory are consistent with those that have been redeveloped into housing projects in the City and region. The selection criteria for sites was based on redevelopment trends of the City of San Bruno as well as those reported in the Housing Elements for the neighboring cities along the San Francisco Peninsula (Table 4-11 and Table 4-12).

The City used objective criteria for evaluating each parcel for near-term development. Sites meeting any one of the following three factors are included in the inventory, as these factors provide the most direct explanation for why existing uses would not hinder redevelopment.

1. Site with property owner or developer interest, suggesting that existing uses lack long-term viability or fail to represent the highest and best use considering current and projected market conditions. This includes sites with pending projects or where owner/developer has expressed interest in redevelopment
2. Vacant Site
3. Sites with limited improvements, specifically parking lots and outdoor/auto storage.
4. If parcels did not meet any of the criteria #1-3, parcels had to meet at least three of the following factors (#4-#8) to be included in the sites inventory.Existing uses are similar to uses that have been recycled based on recent trends as demonstrated by projects presented in the

5. Characteristics of Redevelopment Projects section, Table 4-11 and Table 4-12. Such uses include:

    a. Retail/shopping center
    b. Restaurant
    c. Banks
    d. Office building/Medical Office
    e. Gas station and auto-related uses
    f. Motel

6. Improvement to Land Value (ILV) Ratio – ILV can serve as an indicator of the potential profitability of redeveloping an existing property. When the land value exceeds that of the improvements, the ILV ratio is less than 1.0. Generally, a low ILV ratio of 1.0 signifies definite potential for redevelopment, indicating that the land holds greater value than the improvements present. The HCD Sites Inventory Guidance also considers an ILV ratio of 1.0 as an indicator of potential redevelopment.

    However, office buildings, commercial/retail centers, and hotel/motels often exhibit ILV ratios that exceed 2.0. For instance, as indicated in Table 4-11 and Table 4-12 of recent projects, strip retail parcels had an ILV of 1.10 and 1.52 in the Mills Park Center up to 2.6 in San Mateo. Restaurants with attached parking in the same parcel also had ILV that exceeded 1.0- 1.02 in Mills Park Center up to 4.93 in Millbrae. Office buildings and motels that were redeveloped had even higher ILV-2.20 and 3.94 within the Mills Park Center and 3.64 in South San Francisco.

    Therefore, this analysis uses a 2.5 ILV threshold for commercial centers/office buildings; a threshold of 1.0 ILV is used for other uses.

7. Lot Coverage—Lot coverage is determined using building footprint data obtained from the County of San Mateo GIS data sources. The average lot coverage (building footprint over lot area) is approximately 23 percent for San Bruno projects. However, this figure varies significantly, ranging from 0 percent (e.g., parking lots) to as high as 96 percent (commercial parcels part of a larger strip where parking is in an adjacent parcel).

    Consequently, the sites inventory encompasses parcels with lot coverage up to 50 percent, indicating significant underutilization of land characterized by outdated site designs that allocate large portions to surface parking or landscaping.

8. Single story building –recent projects and pipeline projects involve demolition of mostly single-story buildings, although two project proposed to demolished a two-story buildings. The City used one-story as a threshold for site selection.

9. Age of structure – In general, buildings over than 30 years often require significant investments to modernize. Table 4-11 and Table 4-12 show that commercial/retail structures built in the 1990s (as late as 1997) are being proposed to be demolished for redevelopment. Therefore, this analysis uses (1993) 30+ years as the age threshold for most uses.

Table 4-13 and Table 4-14 show applicable criteria to each site.

TABLE 4-13 PARCEL BY PARCEL SELECTION CRITERIA MET

Site ID	Site #	APN	Type	Address	Use	Met Criteria #1-3?	Criteria Met (#1-3)	Met at 3+ (#4-8)?	Criteria Met	# Criteria Met (#4-8)
1	1	019-270-260	Pending	2101 Sneath Ln	paved parking/storage	Y	1,3	Y	4,6,7,8	4
2	1	019-270-270	Pending	2101 Sneath Ln	vacant	Y	1,2	N	6	1
3	3	020-111-160	Pending	170 San Bruno Ave	paved parking/storage	Y	1	Y	4,5,6,7,8	5
4	4	019-042-150	Pending	850 Glenview Dr	vacant church area	Y	1,2	N	5,6	2
5	4	019-042-160	Pending	850 Glenview Dr	vacant church area	Y	1,2	N	5,6	2
6	4	019-042-170	Pending	850 Glenview Dr	church, paved, some vacant	Y	1,3	Y	4,5,6,7	4
7	5	020-121-360	Pending	111 San Bruno Ave	vacant lot	Y	1,2	Y	4,5,6,7	4
8	6	020-406-590	Pending	271 El Camino Real	vacant lot	Y	1,2	N	5,6	2
9	6	020-406-690	Pending	271 El Camino Real	vacant lot	Y	1,2	N	5,6	2
10	6	020-406-700	Pending	271 El Camino Real	vacant lot	Y	1,2	N	5,6	2
11	6	020-406-730	Pending	271 El Camino Real	vacant lot	Y	1,2	N	5,6	2
12	6	020-406-790	Pending	271 El Camino Real	vacant lot	Y	1,2	N	5,6	2
13	6	020-406-870	Pending	271 El Camino Real	vacant lot	Y	1,2	N	5,6	2
14	7	020-362-180	reuse	465 San Mateo Ave	bank + parking	N		Y	4,6,7,8	4
15	8	020-256-130	reuse	529 El Camino Real	parking lot	Y	3	Y	4,5,6	3
16	8	020-256-140	reuse	529 El Camino Real	parking lot	Y	3	Y	4,5,6	3
17	8	020-256-180	reuse	529 El Camino Real	parking lot	Y	3	Y	4,5,6	3
18	8	020-256-190	reuse	529 El Camino Real	parking lot	Y	3	Y	4,5,6	3
19	8	020-256-250	reuse	529 El Camino Real	parking lot	Y	3	Y	4,5,6	3
20	8	020-256-260	reuse	529 El Camino Real	parking lot	Y	3	Y	4,5,6	3
21	8	020-256-270	reuse	529 El Camino Real	restaurant and lot	N		Y	4,5,6,8	4
22	8	020-256-280	reuse	529 El Camino Real	parking lot	Y	3	Y	4,5,6	3
23	8	020-256-320	reuse	529 El Camino Real	auto shop + parking	N		Y	4,5,6,7,8	5
24	8	020-256-340	reuse	529 El Camino Real	dental office + parking	N		Y	4,5,6,7,8	5
25	8	020-256-350	reuse	529 El Camino Real	office + parking	N		Y	4,5,7,8	4
26	8	020-256-100	reuse	529 El Camino Real	medical office	N		Y	4,5,7,8	4
27	8	020-256-090	reuse	529 El Camino Real	medical office/optometry	N		Y	4,5,6,7,8	5
28	9	020-361-240	reuse	475 San Mateo Ave	bank + parking	Y	1	Y	4,6,7,8	4
29	9	020-361-230	reuse	475 San Mateo Ave	vacant	Y	1	Y	5,6,8	3
30	10	020-116-310	reuse	850 El Camino Real	vacant lot/demolished 2017	Y	2	Y	5,6	2
31	11	020-253-050	reuse	500 Acacia Ave	former school + parking	N		Y	5,6,7,8	4
32	12	020-111-150	reuse	104 San Bruno Ave	vacant	Y	2	Y	4,5,6	3
33	13	020-362-240	reuse	426 El Camino Real	furniture store	N		Y	4,5,7,8	4
34	14	020-362-210	reuse	401 San Mateo Ave	gas station	N		Y	4,5,6,7,8	5
35	15	020-145-470	new_no	590 El Camino Real	restaurant + parking	N		Y	4,5,6,7,8	5
36	15	020-145-010	new_no	590 El Camino Real	parking	Y	3	Y	4,5,6	3
37	15	020-145-020	new_no	590 El Camino Real	Parking	Y	3	Y	4,5,6	3
38	15	020-145-030	new_no	590 El Camino Real	Parking	Y	3	Y	4,5,6	3
39	16	020-012-190	new_no	851 Cherry Ave	commercial structures + parking	Y	1	Y	5,6,7,8	4

Site ID	Site #	APN	Type	Address	Use	Met Criteria #1-3?	Criteria Met (#1-3)	Met at 3+ (#4-8)?	Criteria Met	# Criteria Met (#4-8)
40	17	020-017-020	new_no	801-851 Traeger Dr	office + parking	Y	1	Y	4,5,6,7,8	5
41	18	020-293-030	new_no	333 El Camino Real	pharmacy + parking	Y	1	Y	4,5,6,7,8	5
42	19	020-019-080	new_no	899 El Camino Real	restaurant + parking	Y	1	Y	4,5,6,7,8	5
43	20	014-316-330	new_rezone	1150 El Camino Real	structure + parking	Y	1	Y	4,5,6,7,8	5
44	20	014-311-060	new_rezone	1150 El Camino Real	parking lot	Y	1,3	N	5,6	2
45	21	020-013-100	new_rezone	1151 El Camino Real	pet hospital + parking	N		Y	5,6,7,8	4
46	22	020-013-170	new_rezone	1101 El Camino Real	dental office + parking	Y	3	N	5,6	2
47	22	020-013-200	new_rezone	1101 El Camino Real	dental office	N		Y	4,5,7	3

TABLE 4-14 DETAILED SITE SELECTION CHARACTERISTICS

Site ID	Site #	APN	Type	Address	Use (4)	ILV (5)	Lot Coverage (6)	Stories (7)	Yr built (8)*
1	1	019-270-260	Pending	2101 Sneath Ln	paved parking/storage	N/A	2%	1	Pre-1993
2	1	019-270-270	Pending	2101 Sneath Ln	vacant	N/A	0%	0	-
3	3	020-111-160	Pending	170 San Bruno Ave	paved parking/storage	0.00	17%	1	Pre-1993
4	4	019-042-150	Pending	850 Glenview Dr	vacant church area	0.00	0%	0	-
5	4	019-042-160	Pending	850 Glenview Dr	vacant church area	0.00	0%	0	-
6	4	019-042-170	Pending	850 Glenview Dr	church, paved, some vacant	0.01	8%	0	1990
7	5	020-121-360	Pending	111 San Bruno Ave	vacant lot	0.00	0%	0	1971
8	6	020-406-590	Pending	271 El Camino Real	vacant lot	0.05	0%	0	
9	6	020-406-690	Pending	271 El Camino Real	vacant lot	0.05	0%	0	
10	6	020-406-700	Pending	271 El Camino Real	vacant lot	0.08	0%	0	
11	6	020-406-730	Pending	271 El Camino Real	vacant lot	0.11	0%	0	-
12	6	020-406-790	Pending	271 El Camino Real	vacant lot	0.05	0%	0	
13	6	020-406-870	Pending	271 El Camino Real	vacant lot	0.00	0%	0	
14	7	020-362-180	reuse	465 San Mateo Ave	bank + parking	3.05	25%	1	Pre-1993
15	8	020-256-130	reuse	529 El Camino Real	parking lot	0.04	0%	0	-
16	8	020-256-140	reuse	529 El Camino Real	parking lot	0.00	0%	0	-
17	8	020-256-180	reuse	529 El Camino Real	parking lot	0.00	0%	0	-
18	8	020-256-190	reuse	529 El Camino Real	parking lot	0.00	0%	0	-
19	8	020-256-250	reuse	529 El Camino Real	parking lot	0.08	0%	0	-
20	8	020-256-260	reuse	529 El Camino Real	parking lot	0.05	0%	0	-
21	8	020-256-270	reuse	529 El Camino Real	restaurant and lot	0.19	0%	1	-
22	8	020-256-280	reuse	529 El Camino Real	parking lot	0.05	0%	0	-
23	8	020-256-320	reuse	529 El Camino Real	auto shop + parking	0.37	13%	1	Pre-1993
24	8	020-256-340	reuse	529 El Camino Real	dental office + parking	2.31	30%	1	Pre-1993
25	8	020-256-350	reuse	529 El Camino Real	office + parking	0.26	52%	1	Pre-1993
26	8	020-256-100	reuse	529 El Camino Real	medical office	0.07	87%	2	1925
27	8	020-256-090	reuse	529 El Camino Real	medical office/optometry	0.44	48%	1	1946
28	9	020-361-240	reuse	475 San Mateo Ave	bank + parking	1.36	25%	1	1962
29	9	020-361-230	reuse	475 San Mateo Ave	vacant	0.00	0%	1	
30	10	020-116-310	reuse	850 El Camino Real	vacant lot/demolished 2017	0.00	0%	0	-
31	11	020-253-050	reuse	500 Acacia Ave	former school + parking	N/A	31%	1	1980
32	12	020-111-150	reuse	104 San Bruno Ave	vacant	0.00	0%	0	-
33	13	020-362-240	reuse	426 El Camino Real	furniture store	0.54	74%	1	Pre-1993
34	14	020-362-210	reuse	401 SanMateo Ave	gas station	0.05	32%	1	1962
35	15	020-145-470	new_no	590 El Camino Real	restaurant + parking	0.92	27%	1	1993
36	15	020-145-010	new_no	590 El Camino Real	parking	0.07	0%	0	-
37	15	020-145-020	new_no	590 El Camino Real	Parking	0.04	0%	0	-
38	15	020-145-030	new_no	590 El Camino Real	Parking	0.06	0%	0	-
39	16	020-012-190	new_no	851 Cherry Ave	commercial structures + parking	0.86	28%	1	1981

Site ID	Site #	APN	Type	Address	Use (4)	ILV (5)	Lot Coverage (6)	Stories (7)	Yr built (8)*
40	17	020-017-020	new_no	801-851 Traeger Dr	office + parking	1.21	16%	3	1980
41	18	020-293-030	new_no	333 El Camino Real	pharmacy + parking	0.18	40%	1	1947
42	19	020-019-080	new_no	899 El Camino Real	restaurant + parking	1.05	11%	1	Pre-1993
43	20	014-316-330	new_rezone	1150 El Camino Real	structure + parking	0.00	23%	2	1971
44	20	014-311-060	new_rezone	1150 El Camino Real	parking lot	0.04	0%	0	-
45	21	020-013-100	new_rezone	1151 El Camino Real	pet hospital + parking	0.28	37%	1	1953
46	22	020-013-170	new_rezone	1101 El Camino Real	dental office + parking	0.00	35%	0	-
47	22	020-013-200	new_rezone	1101 El Camino Real	dental office	1.98	84%	2	1967

*Assessor's parcel data did not provide year structure built for all structures. For parcels where date has "pre," buildings were dated using Google Earth time slider imagery. The years with images available were 1993 and skipped to 2002. If structures were present in 1993, they are labeled "pre-1993."

Infrastructure Availability

Public facilities and infrastructure have a direct influence on a city's ability to accommodate residential growth. Therefore, Government Code section 65583.2(b)(5)(B) requires a determination of whether parcels included in the inventory, including any parcels identified for rezoning, have sufficient water, sewer, and dry utilities available and accessible to support housing development or whether they are included in an existing general plan program or other mandatory program or plan, including a program or plan of a public or private entity to secure sufficient water, sewer, and dry utilities supply to support housing development on the site in time to make housing development realistic during the planning period. Dry utilities include, at minimum, a reliable energy source that supports full functionality of the home and could also include access to natural gas, telephone and/or cellular service, cable or satellite television systems, and internet or Wi-Fi service.

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 developed properties which are served by all city services. Furthermore, infrastructure capacity is not anticipated to be issue. Redevelopment of these infill sites may require infrastructure improvements by the City or the developer to upgrade aging infrastructure or to increase capacity but in general developers are required to upgrade infrastructure to service their projects if the improvements are not included in the City's Capital Improvement Program. San Bruno's water delivery/treatment systems and sewer treatment facilities are sufficient and have the capacity to accommodate development on all identified sites in order to accommodate its RHNA. A more detailed discussion of the City's infrastructure is in the Housing Constraints section in the Technical Background Report (TBR).

Environmental Constraints

Government Code section 65583.2(b)(4) requires an analysis and general description of any known environmental or other features that have the potential to impact the development viability of the identified sites. The housing element need only describe those environmental constraints where there is documentation of such conditions. This analysis must demonstrate that the existence of these features will not preclude development of the sites identified in the planning period at the projected residential densities/capacities. The sites in the inventory were screened for potential hazards. Identified environmental concerns are limited to a few areas, primarily toxic contamination from previous uses, noise, and air pollution. None of the hazards identified were found to preclude development on the sites in the inventory or reduce residential capacity.

Noise

As discussed in the Housing Constraints section of the Technical Background Report (TBR), aircraft over flight noise is a significant constraint in San Bruno due to its proximity near San Francisco International Airport (SFO). The Airport Land Use Plan for SFO discourages new housing beneath the aircraft overflight zone where noise generated is considered to be incompatible with residential uses.

To address San Bruno's eastern neighborhoods which are already impacted by noise from aircraft overflight from SFO, the city participates in SFO's airport noise insulation program which provides acoustical improvements to single-family residential properties located inside the 65-dB noise contour. These improvements are offered at no cost to eligible property owners. The goal of the program is to reduce interior noise levels to 45 dB or less. Since 1983, more than 15,200 properties have been treated in Daly City, Millbrae, Pacifica, San Bruno, South San Francisco, and unincorporated areas of San Mateo County to install windows, doors, and ventilation systems for eligible homes. The total program expenditure to date exceeds $192 million. San Bruno will continue to participate in and promote the program.

Other sources of noise include vehicle traffic on the freeways and El Camino Real and noise from trains which impact many of San Bruno's neighborhoods. Neighborhoods within a half mile of U.S 101, I-280 and I-380 are impacted by vehicle traffic noise that can reach 70 dB. Trains operating on the Southern Pacific Railroad Line through the city primarily impact San Bruno's eastern neighborhoods. Noise from these sources are on an intermittent basis. The Health and Safety Element of the General Plan contains policies and actions to mitigate noise in new residences which will apply to all the sites on the inventory that are exposed to high levels of noise. Therefore, high noise levels will not preclude development on the sites in the inventory or reduce their estimated residential capacity.

Analysis of Sites Inventory

For the 6th Cycle RHNA, the City has been allocated a RHNA of 3,165 units (704 very low, 405 low, 573 moderate, and 1,453 above moderate income units). With projected ADUs of 224 units over 8 years and an approved project of 1,130 units, the City has a remaining RHNA obligation of 2,158 units (583 lower, 479 moderate, and 1,096 above moderate income units). The City can only accommodate 1,453 units through pending project sites, re-use sites from the 5th cycle, and new sites that do not require rezone and must identify new sites with development potential to accommodate the shortfall of 847 units (see Table 4-15). The five rezone sites have a capacity for 1,099 units (204 lower income, 69 moderate income, and 826 above moderate income) enough to meet the City's shortfall. The City has must amend its land use policy and zoning to accommodate this shortfall.

TABLE 4-15 SITES INVENTORY SUMMARY

	Income Categories				
	Extremely Low/ Very Low	Low	Moderate	Above Moderate	Total
RHNA	704	405	573	1483	3,165
Credits (Entitled/Approved/Under Construction Units and ADUs)	121	528	94	387	1,130
Remaining RHNA	583	(123)[1]	479	1,096	2,158
Remaining RHNA[2]	583		479	1,096	2,158
6th Cycle Sites Inventory					
Sites with Pending Projects	28		14	258	300
Re-use of 5th Cycle Sites	165		242	16	423
New Sites - No Rezone	365		365	0	730
Total Capacity w/o Rezone	558		621	274	1,453
Shortfall	25		0	822	847
New Sites – Rezone	204		69	826	1,099
Cover Shortfall?	Yes		Yes	Yes	
Surplus	179		211	4	394

1. Excess Credits in one income category cannot be applied to reduce the number of Remaining RHNA units in another income category. While the City technically has 123 more low-income units as credits than the RHNA requires, that figure is not used to calculate the total Remaining RHNA or Buffer.
2 Extremely Low- and Low-Income category combined into Lower Income category for the Sites Inventory
Source: City of San Bruno 2024

Detailed site descriptions are provided below along with tables showing parcel-by-parcel site characteristics and unit distribution.

Sites with Pending Projects

Five of the twenty-one Sites (13 of 47 parcels) are in the Sites with Pending Projects category. These sites vary by size, status, and density, but are combined because they are sites that have planning applications for entitlement currently under review. These projects are not yet approved, thus they are identified in the Sites Inventory as potential sites for the 6th cycle RHNA. These sites have the lowest threshold for analysis because

the property owner or developer has prepared and submitted a development proposal for the units listed. Capacity and affordability for these sites is based on what is proposed in the development application.

Of the active applications, three are relying upon state density bonus law to increase density. One site is on vacant parcels and the remaining four sites are nonvacant but have vacant or underutilized buildings. None of the sites are developing with mixed uses which supports the analysis that there is little market for commercial space in districts that allow housing. This development trend is expected to continue through the planning period until commercial rents increase substantially in mixed-use districts.

Capacity and affordability for these sites is based on what is proposed in the development application. All of the projects in this category are currently under review and includes three projects (111 San Bruno Ave., Glenview Drive and 271 El Camino Real) that were entitled in the 5th RHNA cycle and have new applications. 111 San Bruno Ave. was a partnership between two property owners, which fell through, and the remaining property owner is proceeding with a multi-family property independently. 850 Glenview Dr. And 271 El Camino Real are new applications that would increase the number of units from the previously approved project.

2101 Sneath Ln. (Site #1)

This site is a golf driving range and bus storage facility for the school district, and was formerly the site of Engvall Middle School. The site is made up of two parcels with a combined acreage of 21.11 acres. This site was included in the Sites inventory for the 4th and 5th cycle. A housing developer has applied for entitlements for 118 small-lot single-family dwelling units. The application is pending environmental review. The City's inclusionary housing ordinance requires 6 low-income units and 12 moderate-income units. The applicant is working with the City on an alternative method of compliance. Since the affordable component has not been settled, all 118 units are counted as above-moderate income units for RHNA Strategy. Approval of entitlements is expected in 2024.

170 San Bruno Ave. (Site #3)

The site is a former gas station on the LUST list and will require additional mitigation for underground storage tanks, which is not constraining the proposed development. The applicant proposes a six-story, 42 unit project on a 0.29 acre site (145 DU/ac density), and is utilizing a density bonus. 14 lower-income units and 8 moderate-income units are provided in the application. The site is within the TCP and is in close proximity to Caltrain and SamTrans bus lines. This site was included in the Sites inventory for the 4th and 5th cycle.

850 Glenview Drive (Site #4)

The site is made up of three parcels that were formerly a church and gas station as well as vacant land. The portion of the site that was a gas station is on the LUST list and will require additional mitigation for underground storage tanks, which is not constraining the proposed development. The site was part of the Sites inventory for the 5th cycle, and a project was entitled. A new developer is proposing 58 attached ownership units ("Missing Middle"), including 3 lower-income and 6 moderate-income units, and 3.29 acres.

111 San Bruno Ave. (Site #5)

This project was originally approved in 2021 for a mixed-use building with 62 residential units which included lot consolidation with the adjacent property at 761-767 Huntington Avenue. The partnership between the property owners dissolved which ended the project. The property submitted a revised project in 2023 which proposes a similar five-story mixed-use building but with 46 residential units. The new project proposes 15 percent affordable units and would exercise density bonus provisions. The density and affordability specified in the sites inventory is based on the submitted revised project which is currently under review.

271 El Camino Real (Site #6)

The site covers six vacant parcels that were entitled for 23 dwelling units but recent conversations with the applicant indicate they want to entitle a revised project for the site with 50 percent more units. Therefore, the density specified in the sites inventory for this site is based on the applicant's project submittal.

TABLE 4-16 SITES WITH PENDING PROJECTS

Site ID	Site #	APN	Address	Use	GP LU	Zoning	Prop GP Density	Size	Low	Mod	AM	Tot	Owner ID	Criteria Met (1-8)	Income Criteria
1	1	019-270-260	2101 Sneath Ln	paved parking/storage	Low Density Res.	R-1	6	8.32			51	51	A	1,3,4,6,7,8	I
2	1	019-270-270	2101 Sneath Ln	vacant	Low Density Res.	R-1	6	12.79			67	67	A	1,2,6	I
3	3	020-111-160	170 San Bruno Ave	paved parking/storage	TOD	TOD-1	145	0.29	14	8	20	42	C	1,3,4, 5,6,7,8	I
4	4	019-042-150	850 Glenview Dr	vacant church area	P-D	P-D	18	0.48	1	2	5	8	D	1,2,5,6	I
5	4	019-042-160	850 Glenview Dr	vacant church area	P-D	P-D	18	0.60	1	2	7	10	D	1,2,5,6	I
6	4	019-042-170	850 Glenview Dr	church, paved, some vacant	P-D	P-D	18	2.20	1	2	37	40	D	1,3,4,5,6,7	I
7	5	020-121-360	111 San Bruno Ave	vacant lot	TOD	CBD	112	0.41	7	0	39	46	E	1,2,4,5,6,7	I
8	6	020-406-590	271 El Camino Real	vacant lot	Multi-Use	MX-R	60	0.08	0	0	5	5	F	1,2,5,6	I
9	6	020-406-690	271 El Camino Real	vacant lot	Multi-Use	MX-R	60	0.08	0	0	5	5	F	1,2,5,6	I
10	6	020-406-700	271 El Camino Real	vacant lot	Multi-Use	MX-R	60	0.05	0	0	3	3	F	1,2,5,6	I
11	6	020-406-730	271 El Camino Real	vacant lot	Multi-Use	MX-R	60	0.13	0	0	7	7	F	1,2,5,6	I
12	6	020-406-790	271 El Camino Real	vacant lot	Multi-Use	MX-R	60	0.07	0	0	4	4	F	1,2,5,6	I
13	6	020-406-870	271 El Camino Real	vacant lot	Multi-Use	MX-R	60	0.19	4	0	8	12	F	1,2,5,6	I
							Total	**25.69**	**28**	**14**	**258**	**300**			

Selection Criteria: 1.Owner/Developer Interest, 2.Vacant, 3.Parking lot, 4.Existing use similar to recently redeveloped sites, 5.ILV >1.0 for commercial use, 0.5 for strip retail/shopping malls/office/motels., 6.Lot coverage >50% 7.At least 30 years old (1993), 8. One-story.

Income Category: I. Use the proposed or conceptual project submittal income categories II. Use 50% lower and 50% moderate for sites over 0.5 acres and less than 10 acres with densities greater than 30 du/ac III. Use 100% moderate for sites with parcel size less than 0.5 acres (small site) with densities greater than 30 du/ac. IV.Use 100% above-moderate for sites allowing less than 30 du.

All sites were used in both 4th and 5th cycle planning periods.

Re-use of 5th Cycle Sites

Eight sites are included in the 6th cycle Sites Inventory that were included in the 5th cycle and was not redeveloped in that planning period, and are summarized in Table 4-12. One is vacant, with the rest non-vacant, which requires additional analysis and justification. As noted previously, State law requires the City amend local ordinances to establish a ministerial planning process for housing projects on such sites. Program 9a commits exceed this minimum requirement and amend local ordinances to establish a ministerial process for all the Sites Inventory parcels that achieve the projected density in the Housing Element.

465 San Mateo Ave (Site #7)

This is an underutilized full-service Bank of America branch on a 0.84 acre lot in the Central Business District, and fulfills four of the five criteria the City used to identify non-vacant sites. In 2018 Bank of America had 1,720 fewer branches than in 2008, a 28 percent drop, demonstrating that full-service bank branches, including Bank of America, are on the decline. This trend is expected to continue due to the rapid adoption of mobile banking which has allowed banks to reduce the number of branches they operate. In 2018, Bank of America announced that deposits made on mobile devices like smartphones and tablets are outpacing those made at branches for the first time. This bank building occupies a 25 percent of the site the remainder of which is developed with surface parking that services the bank use. It is included in the inventory since due to its existing underutilized use (use similar to those being redeveloped, lot coverage, age, and single-story. Google images shows the building was present in 1993 and visual observations date the building pre-1980 and there have not been any recent major investments in the property that would discourage redevelopment. Additionally, development does not require lot consolidation and the site has three street frontages which affords it multiple opportunities for dwelling exposure. Site was included in the 2015-2023 Housing Element as site #6 and rezoned in 2021 to CBD. 84 dwelling units are estimated for the site.

529 El Camino Real (Site #8)

This is a site in the TOD-2 Zoning District is made up of 13 individual parcels with multiple uses such as auto repair shops, standalone restaurant, office, and parking lot with a combined area of 1.18 acres. Vehicle sales are conditionally permitted in the zoning district. Nine of the parcels share the same owner. Of the remainder four parcels, two have the same owner and the other two have different owners (for a total of four owners in the Site). Despite different ownership, the City considers the parcels will develop at the same time since two of the sites have shared access to parking in the rear of the property. It is unlikely that uses would remain if adjacent parcels are redeveloped. The site was included in the City's past two Housing Element sites inventories. 118 housing units are estimated for the site. Site is within the TCP and was rezoned in 2021 to TOD-2 zoning where density is not specifically regulated but instead limited by building envelope. The properties that comprise the site have not had much recent investment, other than new signage, and the improvements on the site also appear to pre-date 1980 and are in poor condition. Therefore, the improvements do not represent an impediment to redevelopment. The site is proximate to the Caltrain Station and bus routes along El Camino Real.

475 San Mateo Ave (Site #9)

Like the Bank of America site above, the subject site is a 0.67 acre site made up of two parcels that is occupied by an underutilized Citibank branch surrounded by a surface parking lot located within the Central Business District. Advances in mobile banking have allowed banks to shrink the size and number of branches they operate. The existing building on the site was constructed in 1962 and has not had any significant improvements that would impede redevelopment. The parcels fulfill four and five of the criteria the City used to identify non-vacant sites suitable for redevelopment. In recent months, the property owner(s) have had several conversations

with staff and have expressed interest in redeveloping the site for housing. The site can accommodate 67 dwellings.

850 El Camino Real (Site #10)

This is the site of the former Budget Motel which was demolished in 2019. The site is currently vacant and for sale. The site was included in both the 4th and 5th cycle sites inventories. The site is within the TCP and was rezoned to TOD-2 in 2021. The San Bruno Caltrain Station is within walking distance and there is a bus stop on El Camino Real at the end of the block. The is a potential for 62 units on this site.

500 Acacia Ave (Site #11)

This is an underutilized school district property (formerly Edgemont School) that has gone through the disposition process and is currently being used for school district administrative offices. The site was included in the 4th and 5th cycle sites inventories prior to the disposition and fulfills six of the nine criteria the City used to identify non-vacant sites. The San Bruno Park School District has been experiencing declining enrollment for the past two decades and has closed a number of schools as a result. In the past two decades, the school district has sold a number of former school sites that have been redeveloped with residential uses. 2101 Sneath Lane is another former school site which is included in the inventory. The buildings on the site are single-story school buildings that were built in 1980, with no indication of recent improvements that would impede redevelopment. Staff has reevaluated the site and estimates the site could yield 16 single-family 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., therefore, 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 yards.

104 San Bruno Ave (#12)

The subject site is vacant and located across the street from the San Bruno Caltrain Station. The site was included in both the 4th and 5th cycle sites inventories. Site is within the TCP and was rezoned to TOD-1 in 2021. At less than a half-acre (.17), the site is small and has the capacity for 17 units. The adjacent property, 170 San Bruno Ave. (.29 acre) has similar site characteristics (size, paved lot no longer in use) and has an active application under review for a project proposing 145 units per acre (42 total units). Because previous development activity shows high density is likely and the site is small, the site is projected to develop as all moderate-income units.

426 El Camino Real (Site #13)

Bedroom Express is a locally owned retail furniture store located in the Central Business District. The site was included in the past two housing elements. 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, Pottery Barn 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. The site meets four of the five selection critieria for non-vacant sites. This site is occupied by a single-story commercial building that was constructed prior to 1993. The site is located within a half-mile of the San Bruno CalTrain Station and within one mile of three other furniture retailers. The site was rezoned to TOD-2 in 2021. Since the site is less than ½ acre, the 34 potential units are estimates as moderate income. Although none are built, developers have shown an ability to design projects for small sites like this with residential densities over 100 units per acre.

401 San Mateo Ave (Site #14)

This gas station is located at the southern entrance to downtown San Bruno in the Central Business District and fulfills all five criteria the City used to identify non-vacant sites. 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. Twenty-five (25) dwelling units are estimated for the 0.25 acre site based on an estimated density of 100 units per acre. This density is notably less than the average of what has been developed on small sites, the City is being conservative in estimates. The site has multiple street frontages, providing more design flexibility and opportunity for dwelling exposure.

Because of the gas station on the site, it is listed on the LUST (leaking underground storage tank) list. The LUST case was closed as of 2016. Similar LUST sites in San Bruno have, and are in the process of being redeveloped, showing that this is not a constraint to development.

TABLE 4-17 RE-USE 5TH CYCLE SITES

Site ID	Site #	APN	Address	Use	GP LU	Zoning	Prop GP Density	Size	Low	Mod	AM	Tot	Owner ID	Criteria Met (1-8)	Income Criteria
14	7	020-362-180	465 San Mateo Ave	bank + parking	TOD	CBD	100	0.84	42	42		84	G	4,6,7,8	II
15	8	020-256-130	529 El Camino Real	parking lot	TOD	TOD-2	100	0.11	5	6		11	H	3,4,5,6	II
16	8	020-256-140	529 El Camino Real	parking lot	TOD	TOD-2	100	0.11	6	5		11	H	3,4,5,6	II
17	8	020-256-180	529 El Camino Real	parking lot	TOD	TOD-2	100	0.06	3	3		6	H	3,4,5,6	II
18	8	020-256-190	529 El Camino Real	parking lot	TOD	TOD-2	100	0.06	3	3		6	H	3,4,5,6	II
19	8	020-256-250	529 El Camino Real	parking lot	TOD	TOD-2	100	0.04	2	2		4	H	3,4,5,6	II
20	8	020-256-260	529 El Camino Real	parking lot	TOD	TOD-2	100	0.12	6	6		12	H	3,4,5,6	II
21	8	020-256-270	529 El Camino Real	restaurant and lot	TOD	TOD-2	100	0.15	7	8		15	H	4,5,6,8	II
22	8	020-256-280	529 El Camino Real	parking lot	TOD	TOD-2	100	0.08	4	4		8	H	3,4,5,6	II
23	8	020-256-320	529 El Camino Real	auto shop + parking	TOD	TOD-2	100	0.16	8	8		16	H	4,5,6,7,8	
24	8	020-256-340	529 El Camino Real	dental office + parking	TOD	TOD-2	100	0.06	3	3		6	I	4,5,6,7,8	II
25	8	020-256-350	529 El Camino Real	office + parking	TOD	TOD-2	100	0.06	3	3		6	I	4,5,7,8	II
26	8	020-256-100	529 El Camino Real	medical office	TOD	TOD-2	100	0.07	4	3		7	J	4,5,7,8	II
27	8	020-256-090	529 El Camino Real	medical office/ optometry	TOD	TOD-2	100	0.1	5	5		10	K	4,5,6,7,8	II
28	9	020-361-240	475 San Mateo Ave	bank + parking	TOD	CBD	100	0.55	27	28		55	L	1,4,6,7,8	II
29	9	020-361-230	475 San Mateo Ave	vacant	TOD	CBD	100	0.12	6	6		12	L	1,5,6,8	II
30	10	020-116-310	850 El Camino Real	vacant lot/demolished 2017	TOD	TOD-2	100	0.62	31	31		62	M	2,5,6,7	II
31	11	020-253-050	500 Acacia Ave	former school and parking	Low Density Res.	R-1	7.27	2.18			16	16	N	5,6,7,8	IV
32	12	020-111-150	104 San Bruno Ave	paved parking	TOD	TOD-1	100	0.17		17		17	O	2,4,5,6	III
33	13	020-362-240	426 El Camino Real	furniture store	TOD	CBD	100	0.34		34		34	P	4,5,7,8	III
34	14	020-362-210	401 San Mateo Ave	gas station	TOD	CBD	100	0.25		25		25	Q	4,5,6,7,8	III
							Total	**6.25**	**165**	**242**	**16**	**423**			

Selection Criteria: 1.Owner/Developer Interest, 2.Vacant, 3.Parking lot, 4.Existing use similar to recently redeveloped sites, 5.ILV >1.0 for commercial use, 0.5 for strip retail/shopping malls/office/motels., 6.Lot coverage >50% 7.At least 30 years old (1993), 8. One-story.

Income Category: I.Use the proposed or conceptual project submittal income categories II. Use 50% lower and 50% moderate for sites over 0.5 acres and less than 10 acres with densities greater than 30 du/ac III. Use 100% moderate for sites with parcel size less than 0.5 acres (small site) with densities greater than 30 du/ac. IV.Use 100% above-moderate for sites allowing less than 30 du.

All sites were used in both 4th and 5th cycle planning periods.

New Sites – No Rezone

This category consists of five sites (eight parcels) identified for the 6th cycle that were not part of past Housing Elements and do not have pending projects, as shown in Table 4-13. This group has zoning in place to accommodate the residential uses at the densities anticipated. Many of these were included based on owner or developer interest. Program 9a commits the City to establish a ministerial review process for housing projects on the Sites Inventory that achieves the projected density in the Housing Element. This will further incentivize property owners on the Sites Inventory to redevelop during the planning period.

590 El Camino Real (Site #15)

This is an underutilized property including 4 parcels with an IHOP restaurant building dating from about 1960's[46] and surface parking lot located in the TOD-2 Zoning District. The parcels meet at least four of the five objective selection criteria the City identified for non-vacant sites. The IHOP chain experienced financial troubles during the Coronavirus Pandemic and is still trying to recover. Although the financial situation for this location is unknown, it was chosen because of its location, existing uses, value of improvements relative to property value, 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 0.52-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. Fifty-two (52) dwelling units are estimated for the site. Site is within the TCP and have a TOD zoning where density is not specifically regulated but instead limited by building envelope. These TOD sites are suitable for lower income units because they have a realistic density of 100 units per acre and therefore meet the default density requirement for lower income units of allowing a minimum of 30 units per acre. A conservative projection was used for 50 percent moderate, 50 percent lower income units is used for this site.

851 Cherry Avenue (Site #16)

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 estimated number of dwelling units (210 units) is consistent with the number of dwelling units permitted pursuant to the housing overlay. Located in the Bayhill Office Park with the BRO (Bayhill Regional Office) land use designation with a Residential Overlay that provides for a specified number of residential units instead of a stated density. This site meets four of the five criteria used to identify non-vacant sites and is included primarily because of the interest of the property owner who is exploring options to improve the property. The projection is that high-density housing could be added within the parking lot area without removing any commercial square footage.

801-851 Traeger Drive (Site #17)

Office building recently rezoned for housing option at owners' request during the creation of the Bayhill Specific Plan. This site meets all five of the nine criteria the City used to identify non-vacant sites, and has been included primarily due owners' interest in the residential zoning overlay The specified number of dwelling units

46 Google Earth images date it pre-1993 but based on visual observations it may be a 1960s build

(205 units) is consistent with the maximum number dwelling units permitted pursuant to the housing overlay. Based on input from many office developers, there is low demand for office space, so there is minimal competition from commercial developers for this site. Since the City approval of the 840 San Bruno Ave project, the owner of Site #17 has been in communication with the City about interest in developing for housing.

333 El Camino Real (Site #18)

This is a Walgreens store in the TOD Zoning District on 1.32 acres. The site meets all five criteria the City used to identify non-vacant sites. The property has a large surface parking lot and shows no signs of recent investments that would preclude redevelopment. 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. The property owner has actively been in communication with the City and prospective housing developers and have conceptually proposed up to 150 units. For conservative purposes, the City is utilizing the lower 100 units per acre density and projecting only 132 units for the Housing Element. There is one design constraint on the property involving a storm drain line that runs diagonally through the property. However, the conceptual plans showing 150 units builds around that area.

899 El Camino Real (Site #19)

This is a standalone Chilli's restaurant on 1.31 acres located in a TOD Zoning District. Single-use, large format restaurants with significant surface parking lots, near transit, 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. The site meets all five criteria identified by the City for non-vacant sites. The site is in a short walking distance to the YouTube headquarters, is on a major bus line, and is in close proximity to Interstate 380.

TABLE 4-18 NEW SITES- NO REZONE

Site ID	Site #	APN	Address	Use	Acres	GP LU	Zoning	Prop GP Density	Size	Low	Mod	AM	Tot	Owner ID	Criteria Met (1-8)	Income Criteria
35	15	020-145-470	590 El Camino Real	restaurant + parking	0.26	TOD	TOD-2	100	0.26	13	13		26	R	4,5,6,7,8	II
36	15	020-145-010	590 El Camino Real	parking	0.10	TOD	TOD-2	100	0.10	5	5		10	R	3,4,5,6	II
37	15	020-145-020	590 El Camino Real	parking	0.08	TOD	TOD-2	100	0.08	4	4		8	R	3,4,5,6	II
38	15	020-145-030	590 El Camino Real	parking	0.08	TOD	TOD-2	100	0.08	4	4		8	R	3,4,5,6	II
39	16	020-012-190	851 Cherry Ave	commercial + parking	9.21	TOD	BNC	23	9.21	105	105		210	S	1,5,6,7,8	II
40	17	020-017-020	801-851 Traeger Dr	office + parking	6.06	Regional Office	BRO	34	6.06	103	103		206	T	1,4,5,6,7,8	II
41	18	020-293-030	333 El Camino Real	pharmacy + parking	1.32	TOD-2	TOD-2	100	1.32	66	66		132	U	1,4,5,6,7,8	II
42	19	020-019-080	899 El Camino Real	restaurant + parking	1.31	TOD	TOD-2	100	1.31	65	66		131	V	1,4,5,6,7,8	II
								Total	**18.42**	**365**	**365**	**0**	**730**			

Selection Criteria: 1.Owner/Developer Interest, 2.Vacant, 3.Parking lot, 4.Existing use similar to recently redeveloped sites, 5.ILV >1.0 for commercial use, 0.5 for strip retail/shopping malls/office/motels., 6.Lot coverage >50% 7.At least 30 years old (1993), 8. One-story. Income Category: I.Use the proposed or conceptual project submittal income categories II. Use 50% lower and 50% moderate for sites over 0.5 acres and less than 10 acres with densities greater than 30 du/ac III. Use 100% moderate for sites with parcel size less than 0.5 acres (small site) with densities greater than 30 du/ac. IV.Use 100% above-moderate for sites allowing less than 30 du.

None of these sites were used in the 4th or 5th cycle planning period.

New Sites – Rezone Required

The last category consists of three sites that are newly identified for the 6th cycle and require a rezoning to accommodate the projected housing, as shown in Table 4-14.

1150 El Camino Real – Tanforan Mall (Site #20)

The Tanforan Mall is an aging shopping center that has been struggling for several years due to declining retail activity. The property is within a Planned Development zoning district and has a regional commercial General Plan land use designation which do not allow for residential uses. Faced with the knowledge that portions of the site were up for sale, the City released the Reimagining Tanforan Land Use Fact Sheet outlining the challenges and opportunities for redevelopment of the site. The City Council adopted the Reimagining Tanforan Land Use Fact Sheet in July 2021. The vision outlined in the document includes office, hotel, retail, entertainment, and a minimum of 1,000 housing units. In 2021 and 2022, the entire 44-acre property was purchased by a developer.

In October 2022, the development team submitted a preliminary application to redevelop the site into a transit-oriented mixed-use village that includes a minimum of 1,002 housing units (of which 176 are lower income). The property would need to be rezoned to permit housing planned development plan amendment, CEQA review, and project entitlements are anticipated to be completed during the planning cycle. The project is currently under review. The residential capacity specified in the preliminary application have been added to the sites inventory, only for the parcels where the conceptual plan places the housing development.

Tanforan (1150 El Camino Real) is one of two sites in the inventory that is impacted by airport noise. Therefore, new housing at the Tanforan site is considered noncompliant with the SFO Airport Land Use Plan. SFO officials have made it clear to the city that they oppose housing at the Tanforan site for this and other reasons. Through review, the City/County Association of Governments (C/CAG), acting as the Airport Land Use Commission (ALUC) has determined this Housing Element is not consistent with the SFO ALUCP because it proposes new residential uses at the Tanforan site. San Bruno's Council adopted an override of the decision when the Housing Element was adopted in January 2023, which is the first step in the process. The ALUC will also need to review the project entitlement and issue a compatibility determination and Council will need to adopt a project specific override when the Tanforan project comes before them for review. If approved, new residences would not qualify for SFO's airport noise insulation program, therefore, new residences at Tanforan would need to incorporate additional noise mitigation measures to reduce interior noise to acceptable levels.

A portion of the site that was formerly a Sears Automotive Center is listed on the LUST list and may require additional mitigation for underground storage tanks. The city has required additional soil testing and soil disposal plans for the development of similar sites in the past. Therefore, inclusion on the LUST list does not preclude redevelopment of the site but additional mitigation might be required before site development can proceed.

1151 El Camino Real (Site #21)

The 0.57-acre site is occupied by a pet hospital and a surface parking lot. 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. The General Plan designation (Multi Use – Residential Focus) allows housing but the zoning is Neighborhood Commercial which does not allow residential uses. The site would need to be rezoned to TOD to accommodate the 57 housing units estimated for the site. The property was included in the inventory because the building was constructed in 1953 and has not undergone any significant improvements that would constrain site redevelopment and the site is close to BART. The property is more likely to redevelop once the future Tanforan development is completed across the street from the site. Because the site is greater than a half-acre and allows

high density housing, HCD guidance considers the site financially feasible for lower-income housing. Conservatively, the projected housing units for this site are 50 percent lower income and 50 percent moderate, consistent with similar sized sites. In total, the site meets four of the five selection criteria for non-vacant sites. and will be rezoned to allow for housing in early 2024.

1101 El Camino Real (Site #22)

The subject site is occupied by a two-story dental office and surface parking lot located in a Planned Development Zoning District with a High-Density Residential General Plan land use designation covering two parcels. Forty housing units are estimated for the site. The site with the building meets three of the five selection criteria (the site that is parking only needs to cover that selection factor). In addition, this site was chosen due to its location and potential for intensification. The site is located 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 1,002 residential units among other development improvements. This area is particularly saturated with dental offices with 16 existing dentist offices within 1-mile of the site. 0.4 acres, less than half-acre, so projecting 100 percent moderate units with no lower-income units. Data shows small sites have developed at a density greater than the projected 100 units per acre. The site will be rezoned in early 2024.

TABLE 4-19 NEW SITES REQUIRING REZONE

Site ID	Site #	APN	Address	Use	Acres	Existing GP LU	Proposed GP LU	Existing Zoning	Proposed Zoning	Prop GP Density *	Size	Low	Mod	AM	Tot	Owner ID	Criteria Met (1-8)	Income Criteria
43	20	014-316-330	1150 El Camino Real	structure and parking	11.28	Regional Commercial	TOD	P-D	P-D	85	11.28	156		736	892	W	1,4,5,6,7,8	I
44	20	014-311-060	1150 El Camino Real	parking lot	1.40	Transit Oriented Development	TOD	TOD-1	P-D	85	1.40	20		90	110	W	1,3,5,6	I
45	21	020-013-100	1151 El Camino Real	pet hospital + parking	0.57	Multi-Use	TOD	C-N	TOD-2	100	0.57	28	29		57	X	5,6,7,8	II
46	22	020-013-170	1101 El Camino Real	dental office + parking	0.28	High Den Residential	TOD	P-D	P-D	100	0.28		28		28	Y	3,5,6	III
47	22	020-013-200	1101 El Camino Real	dental office	0.12	High Den Residential	TOD	P-D	P-D	100	0.12		12		12	Y	4,5,7	III
										Total	**13.65**	**204**	**69**	**826**	**1,099**			

*Density used to calculate capacity. Proposed GP Density has no limit for all rezone sites.

Selection Criteria: 1. Owner/Developer Interest, 2.Vacant, 3.Parking lot, 4.Existing use similar to recently redeveloped sites, 5.ILV >1.0 for commercial use, 0.5 for strip retail/shopping malls/office/motels., 6.Lot coverage >50% 7.At least 30 years old (1993), 8. One-story. Income Category: I. Use the proposed or conceptual project submittal income categories II. Use 50% lower and 50% moderate for sites over 0.5 acres and less than 10 acres with densities greater than 30 du/ac III. Use 100% moderate for sites with parcel size less than 0.5 acres (small site) with densities greater than 30 du/ac. IV. Use 100% above-moderate for sites allowing less than 30 du.

None of these sites were used in the 4th or 5th cycle planning period.

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Affirmatively Furthering Fair Housing

Skyline Ridge Neighborhood, City of San Bruno

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)).

Until recently, Housing Element law had no requirements for how new housing was distributed across cities and neighborhoods. Local jurisdictions repeatedly fell far short of housing goals and have often concentrated multifamily and/or affordable sites in low-income neighborhoods. Recent legislation has strengthened the mechanisms for holding local jurisdictions accountable in the Housing Element process. Additionally, in 2017, Assembly Bill (AB) 1771 added an enhanced racial equity focus to state-mandated housing targets with an explicit mandate that the distribution plans for the housing targets affirmatively further fair housing.

Assembly Bill (AB) 686, passed in 2018, requires that all public agencies in the state complete new AFFH analysis as part of the most recent Housing Element cycle, 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 further fair housing 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.

The goal of Affirmatively Furthering Fair Housing (AFFH) is to combat housing discrimination, eliminate racial bias, undo historic patterns of segregation, and lift barriers that restrict access in order to foster inclusive communities and achieve racial equity, fair housing choice, and opportunity for all Californians.

See the AFFH Matrix in Chapter 3 of the Housing Element (Housing Plan) for a summary of Housing Element programs and other activities that address AFFH issues, including timelines, geographic targets and metrics.

History of Discrimination 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.

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." 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.

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.

The segratory 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." 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, the Ramaytush Ohlone lost the vast majority of their population as well as their land." The lasting influence of these policies and practices have contributed directly to the disparate housing and economic outcomes collectively experienced by Native populations today.

The timeline of major federal Acts and court decisions related to fair housing choice and zoning and land use appears on the following page.

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.

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.

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.

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.

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.

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%) are less likely to experience housing discrimination.

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.

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).

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).

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.

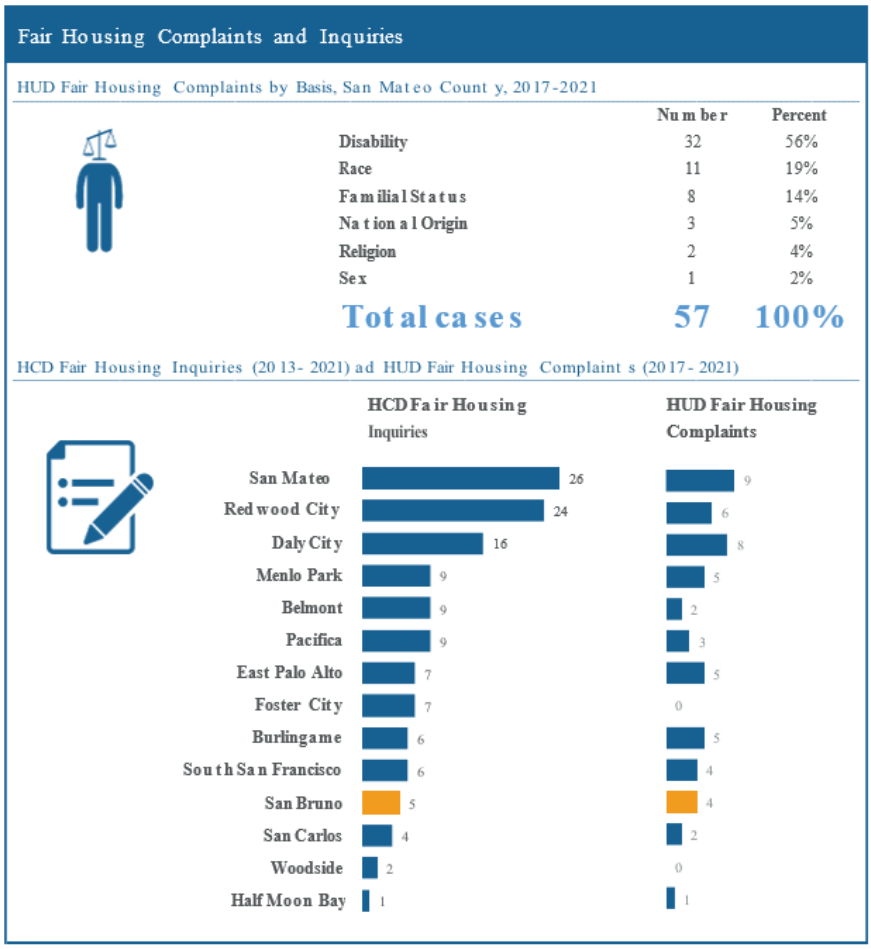


Figure 5-1 Fair Housing Complaints and Inquiries

Source: HUD.

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.[47] 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.

47 1 https://www.sanbruno.ca.gov/gov/city_departments/commdev/housing/default.htm .

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 section of this Housing Element.

Local policies in place to encourage housing development.

- Mixed Use Zoning
- Condominium Conversion Ordinance
- Housing Development Impact Fee
- Commercial Development Impact Fee
- Accessory Dwelling Unit Ordinance
- Density Bonus Ordinance

Local barriers to affordable housing development.

- 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

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 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

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.

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.

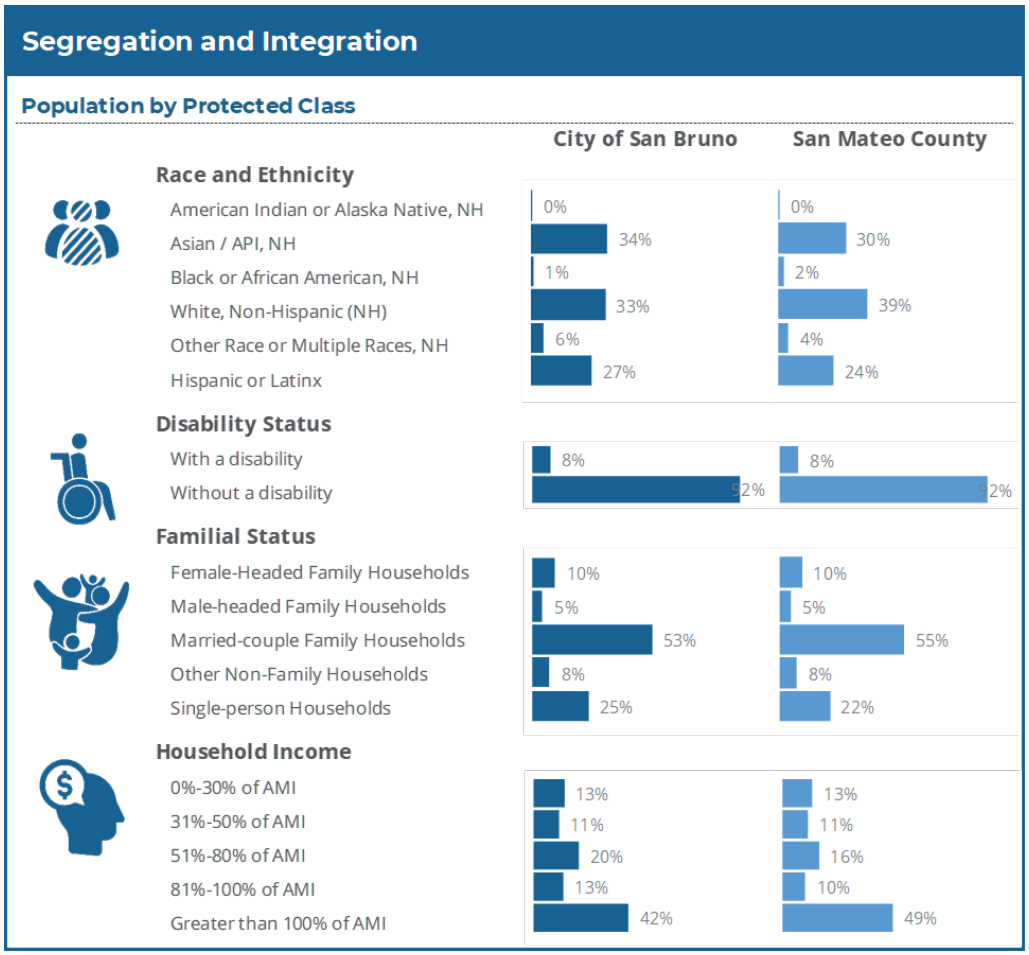


Figure 5-2 Segregation and Integration Key Fair Housing Factors

Source: HUD.

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.

Housing Sites By Census Tract

The following table shows the distribution of housing sites by census tract compared to citywide indicators to understand how the projected locations of units will affirmatively further fair housing in the following categories: predominant population, TCAC/HUD opportunity areas, median income, disability rates, educational score, environmental health, and overpayment. The following sites inventory discussion includes an analysis of the number of projected units by income category, total RHNA capacity, and city acreage by income category to further assess the potential impacts of the sites inventory to affirmatively further fair housing.

TABLE 5-1 SITES INVENTORY BY CENSUS TRACT

6th Cycle Sites Inventory by Tract	Extremely Low/ Very Low	Low	Moderate	Above Moderate	Total
6038.02					
1. 2101 Sneath (Engvall)	-		-	118	118
4 850 Glenview (Church)	3		6	49	58
	3		6	167	176
6039					
6. 271 El Camino Real (Vacant)	4		-	32	36
18. 333 El Camino Real (Walgreens)	66		66	-	132
	70		66	32	168
6040					
8. 529 El Camino Real (Car Sales)	59		59	-	118
11. 500 Acacia (former Edgemont)	-		-	16	16
	59		59	16	134
6041.02					
16 851 Cherry (Bayhill)	105		105	-	210
17. 801-851 Traeger (Office)	103		103	-	206
19. 899 El Camino Real (Chili's)	65		66	-	131
20. 1150 El Camino Real (Tanforan)	176		-	826	1,002
21 1151 El Camino Real (Pet Hospital)	28		29		57
22 1101 El Camino Real (Russo)	-		40		40
	477		343	826	1,646
6041.04					
3. 170 San Bruno (Vacant)	14		8	20	42
5. 111 San Bruno (Vacant)	7		-	39	46
7. 465 San Mateo (Bank of America)	42		42	-	84
9. 475 San Mateo (Citibank)	33		34	-	67
10. 850 El Camino Real (former Budget)	31		31	-	62
15. 590 El Camino Real (IHOP parking)	26		26	-	52
12. 104 San Bruno (Vacant)	-		17	-	17
13. 426 El Camino Real (Bdrm Express)	-		34	-	34
14 401 San Mateo (San Bruno Gas)	-		25	-	25
	153		217	59	429
Total Units Toward RHNA	**762**		**691**	**1,100**	**2,553**

Predominant Populations Analysis

Geospatially, San Bruno has three census tracts with sizable White majorities and one census tract with a slim White majority (Figure 5-3). Additionally, two other census tracts have sizable Hispanic majorities and three other have Asian majorities—two sizable and one slim. Specifically, tracts 6041.04, 6041.03, and 6042 have a sizeable gap between other ethnicities by 30%, 30%, and 42% respectively. The pattern of predominantly Hispanic census tracts continues north of San Bruno around Highway 101. 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. Census Tracts 6041.03, 6041.04, and 6042 are predominantly Hispanic population and these are three of San Bruno's lowest income census. The gap between other ethnicities is, on average, greater than 53%.

As shown in Figure 5-3, 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 1,002 housing units, and denser housing sites are located in San Bruno's eastern neighborhoods closer to high quality transit opportunities such as BART and CalTrain, significantly more than half of San Bruno's proposed housing

units will be 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 former AT&T site, which will provide 341 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 former AT&T site 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.

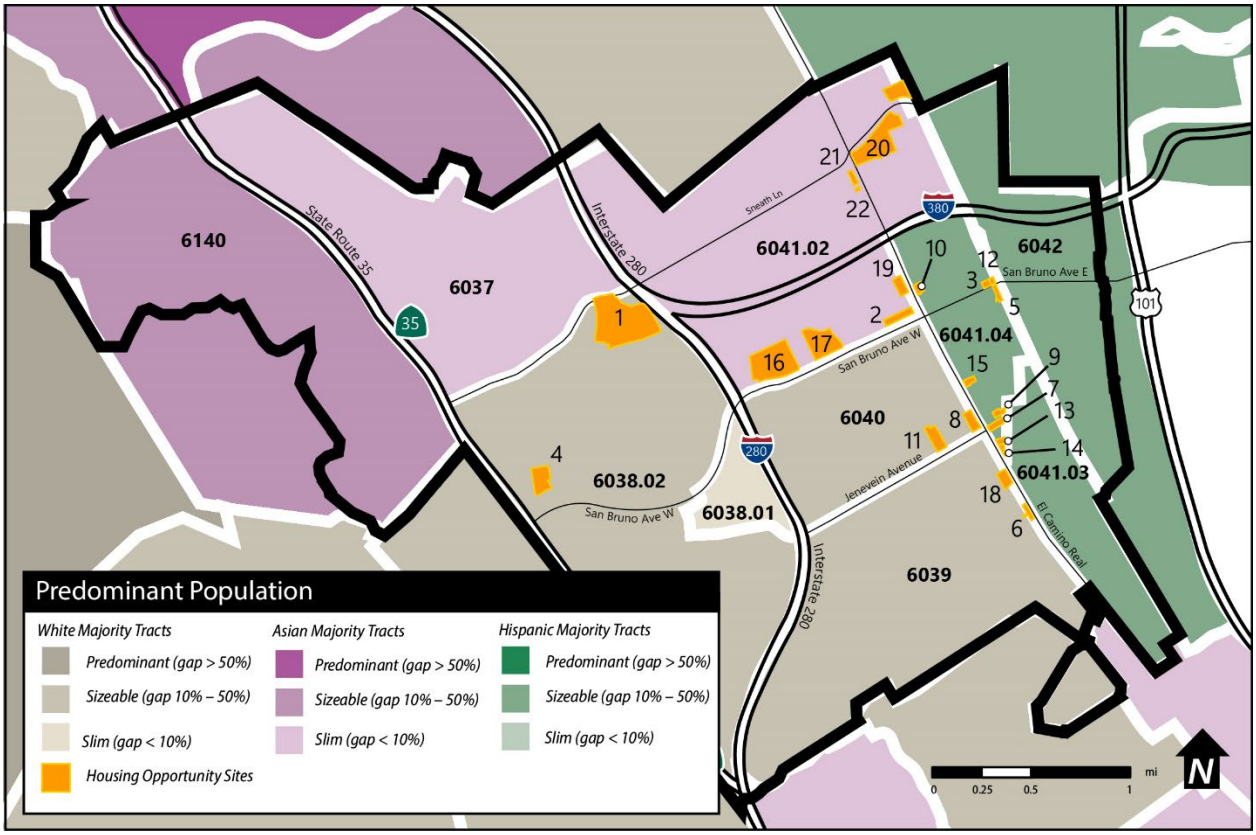


Figure 5-3 Predominant Populations by Census Tract

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 (176 lower and moderate income units) and other significant sites such as the former AT&T site (341 lower and moderate income units), Bayhill Shopping Center (210 lower and moderate income units), Traeger Office Building (205 lower and moderate income units), and the Chili's Restaurant (130 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, former AT&T site, 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 former AT&T 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 5-4 shows census tracts by neighborhood segregation typology, specifically the predominant racial and ethnic makeup of renter households in those tracts. A majority 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 are 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. 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 9 opportunity sites located in this area which include 411 housing units and are expected to produce 262 moderate and above moderate- income units and 149 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 785 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 6041.02).
- Census Tract 6038.01 is San Bruno's lowest income census tract and has only a slim gap of more White residents than the surrounding census tracts. This census tract is west of Interstate 280, south of San Bruno Avenue and north of Crystal Springs Road. There are no opportunity sites in census tract 6038.01 because the tract is built out with existing residential development, primarily with the 1,296 condominiums of the Shelter Creek development, which dictates the tract's demographics.

Summary of Integration and Segregation Fair Housing Factors and Site Inventory RHNA

TABLE 5-2 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	Low	Low	Mod	Mod	High	High	Mod	Low	Very 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	813	149	9	69	50	0	0	0	0
Moderate-Income Units	345	203	18	65	49	0	0	0	0
Above Moderate-Income Units	826	59	149	32	16	0	0	0	0
Total Units	**1,646**	**429**	**176**	**166**	**134**	**0**	**0**	**0**	**0**
Percent RHNA in Census Tract	**65%**	**17%**	**7%**	**7%**	**5%**	**0%**	**0%**	**0%**	**0%**

Source: City of San Bruno 2022.

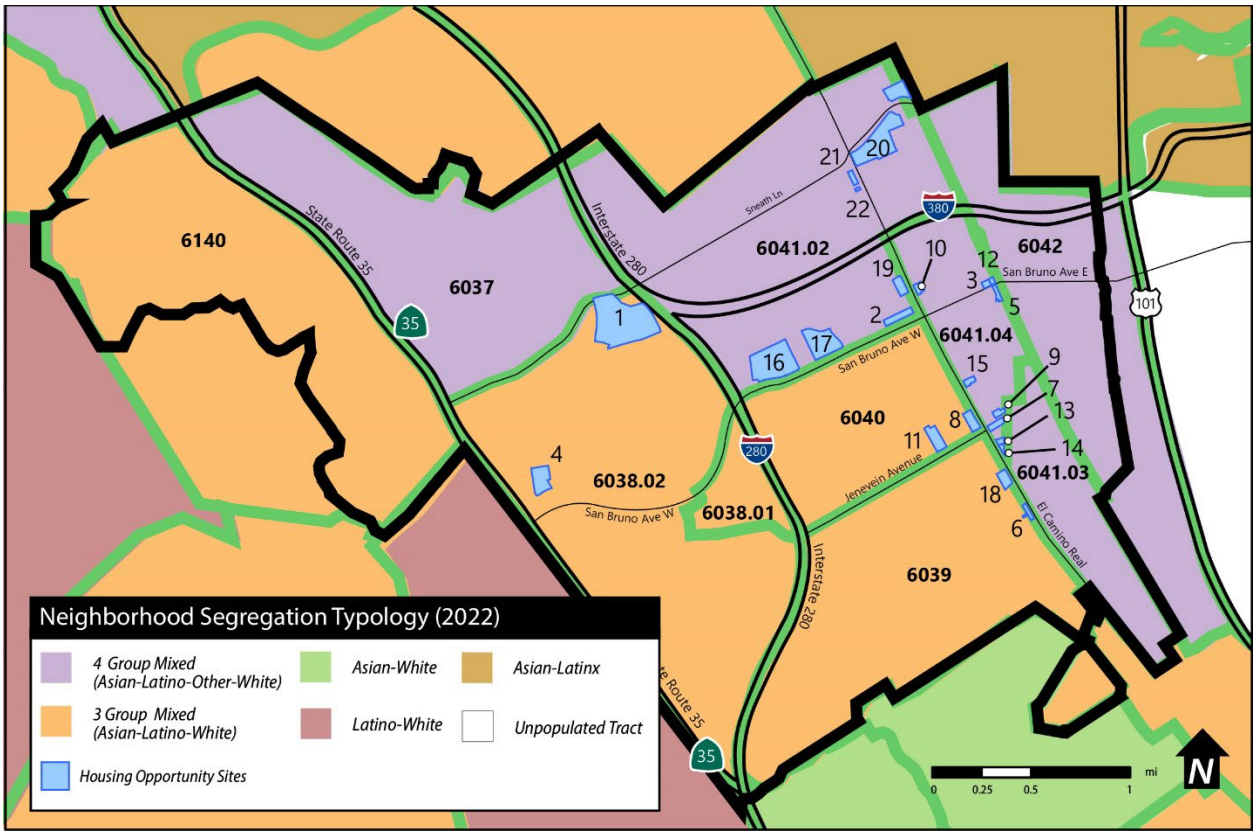


Figure 5-4 Proposed RHNA Sites in Relation to Neighborhood Segregation Typologies

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.
- Census tract 6038.01 reports the lowest median household income in San Bruno, with less than $55,000 per household. This is the lowest median household income within a 2.5 mile radius, where the next reported low median household income is up north in South San Francisco.

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 5-5). 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).

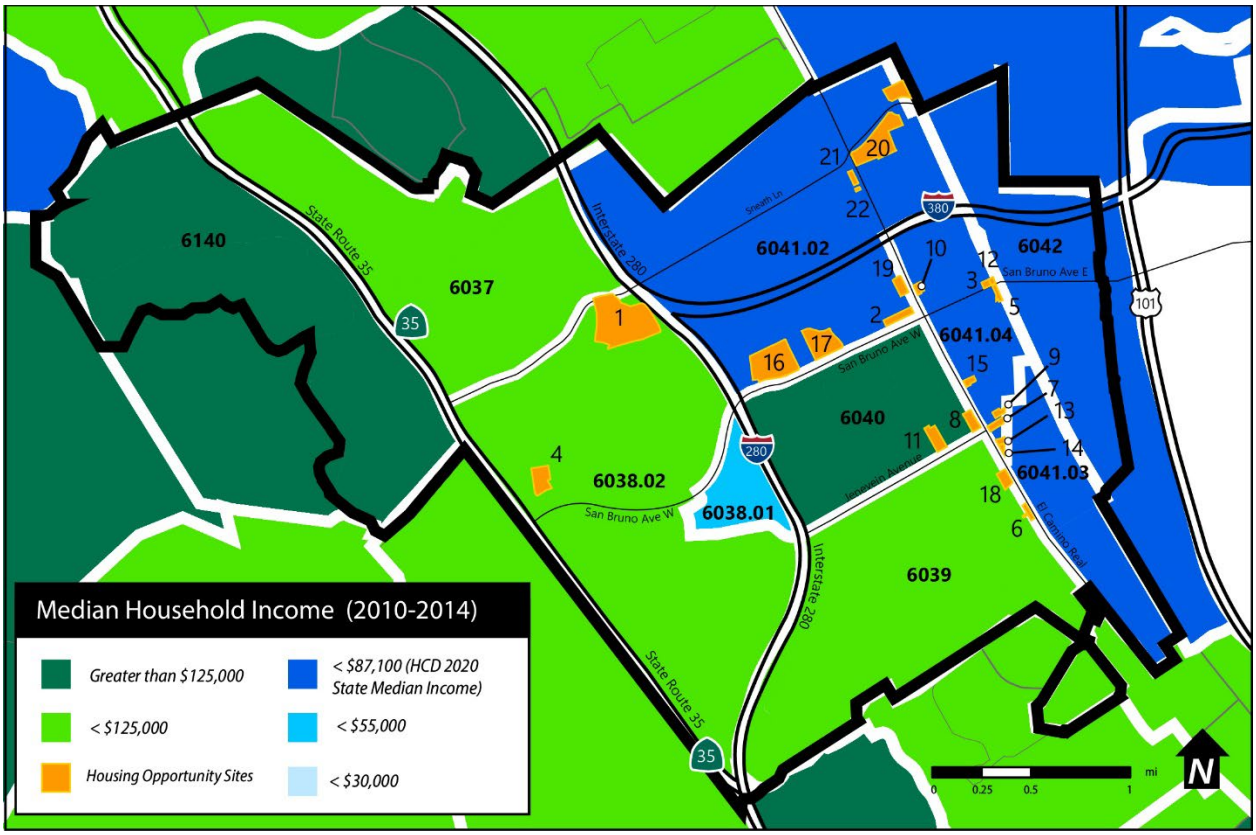


Figure 5-5 Median Household Income by Census Tract

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.

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.

Site Inventory Analysis Summary: 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 5-6). Census Tract 6037 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 5-4). 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 5-14). 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.

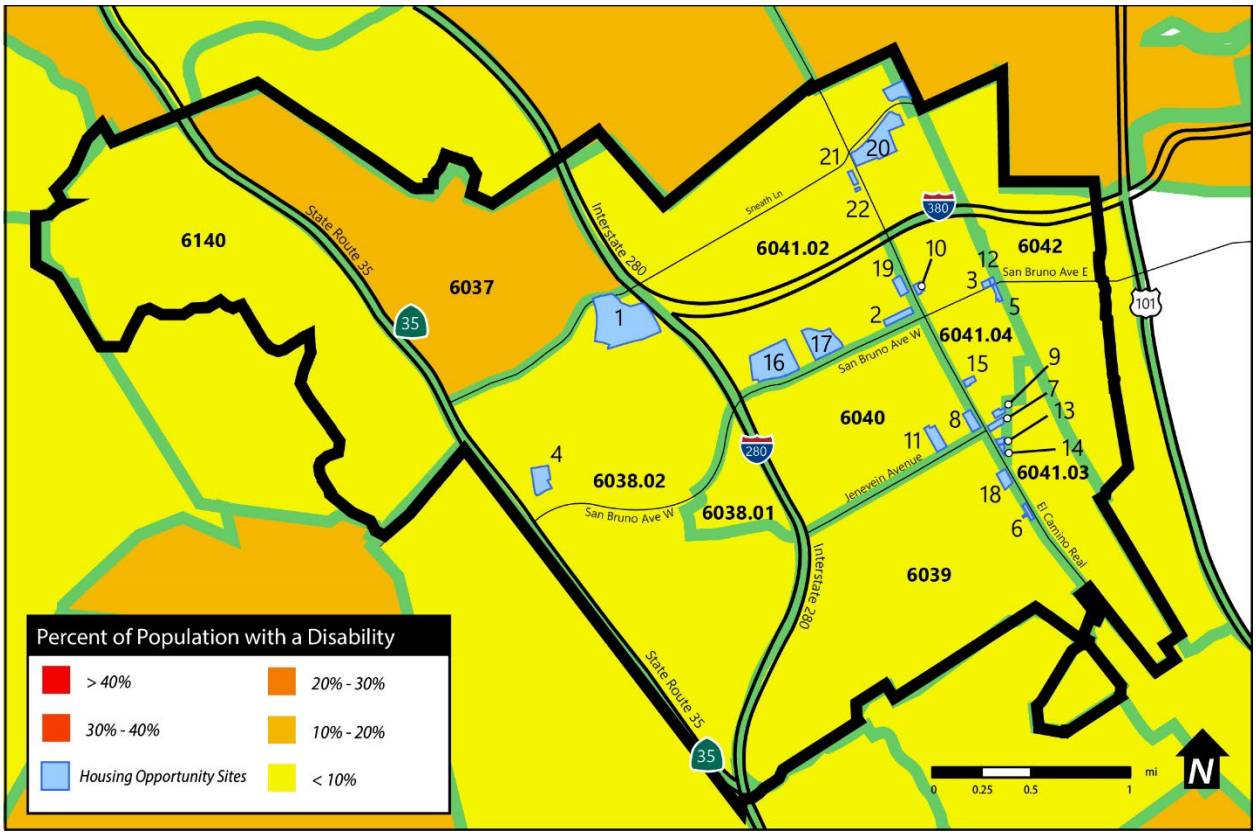


Figure 5-6 Percent of Population with a Disability by Census Tract

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

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. 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.

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 II-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.

- As shown in Figure 5-6, 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. Specifically, tract 6040 has an environmental health score of 27 – lower scores means less of a calculated environmental health disadvantage. 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.
- 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 (130 lower and moderate-income units), Edgemont ES (no lower or moderate-income units) and 529 El Camino Real (99 lower and moderate-income units).
- The low resource census tract, 6041.04, with concentrations of households with children will be served by nine opportunity sites that will include 352 lower and moderate-income units.
- These neighborhoods with higher concentrations of households with children are also close to the 1,988 units in census tract 6041.02 (Tanforan and six other significant sites) and will provide housing at various income levels for households with children.

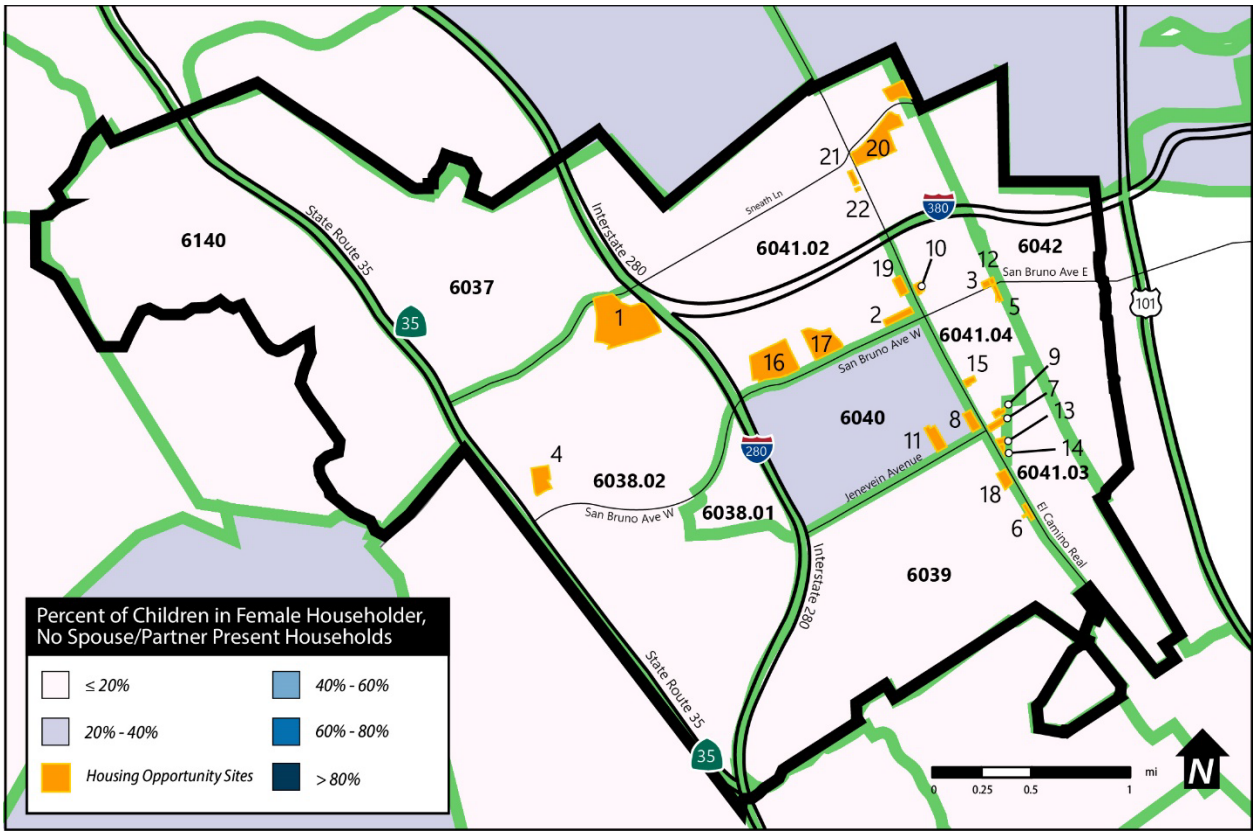


Figure 5-7 Proposed RHNA Sites in Relation to the Percentage of Female Headed Households by Tract

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

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 5-2).

Census Tract 6041.03, 6041.04, and 6042 are three 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 tracts are home to a predominantly Hispanic population, where the gap between other ethnicities is, on average, greater than 53%. 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 less than $87,700 which reflects the median income for the city and county (census tracts 6041.03 and 6041.04). 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.

This is the lowest median household income within a 2.5-mile radius, where the next reported low median household income is up north in South San Francisco.

Census Tract 6038.02, 6039.00 and 6040.00 has a relatively large Asian and White population compared to the Hispanic population and a lower percentage of low-income residents than the city.

Census Tract 6039.00 (Table 5-4) 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).

Census Tract 6040.00 (Table 5-5) has 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.

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.

Summary of Integration and Segregation Fair Housing Factors and Site Inventory RHNA

TABLE 5-3 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

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 5-8.

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.

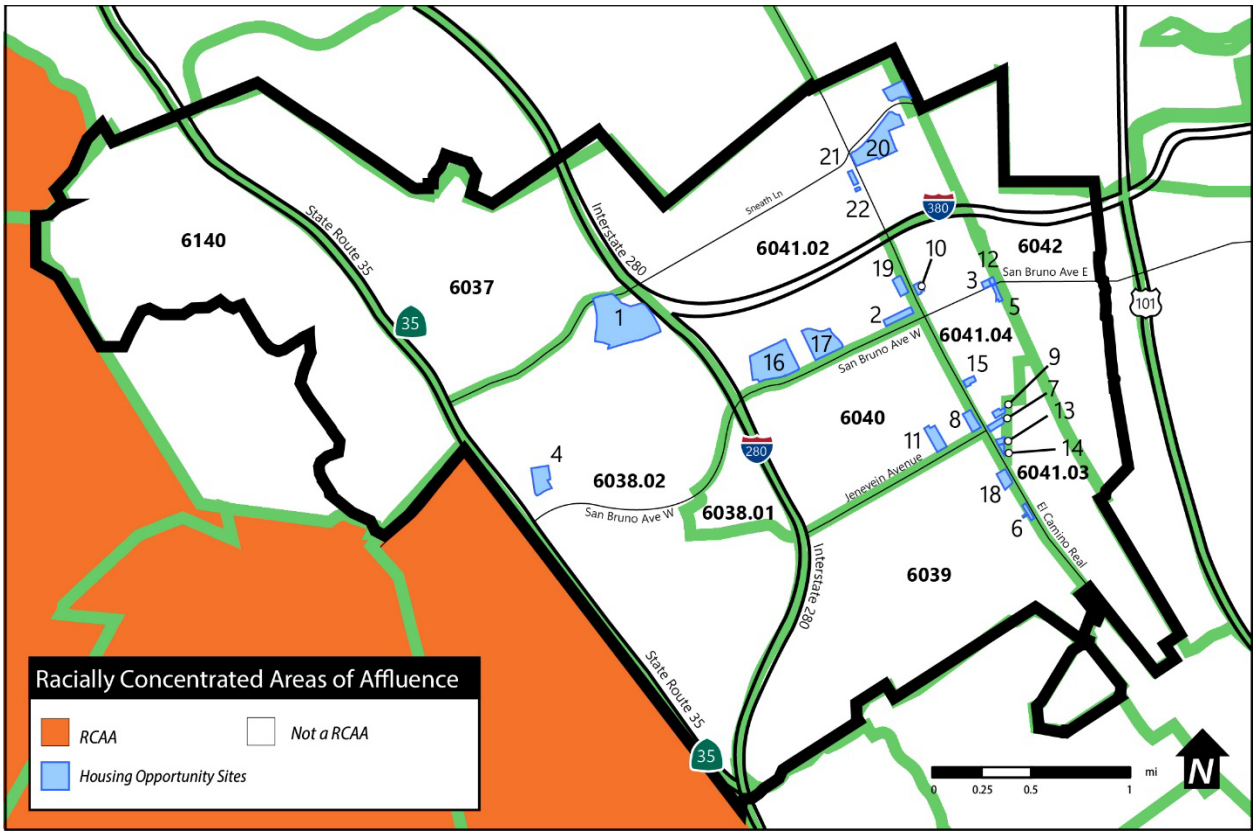


Figure 5-8 Proposed RHNA Sites in Relation to Racially Concentrated Areas of Affluence

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.

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.

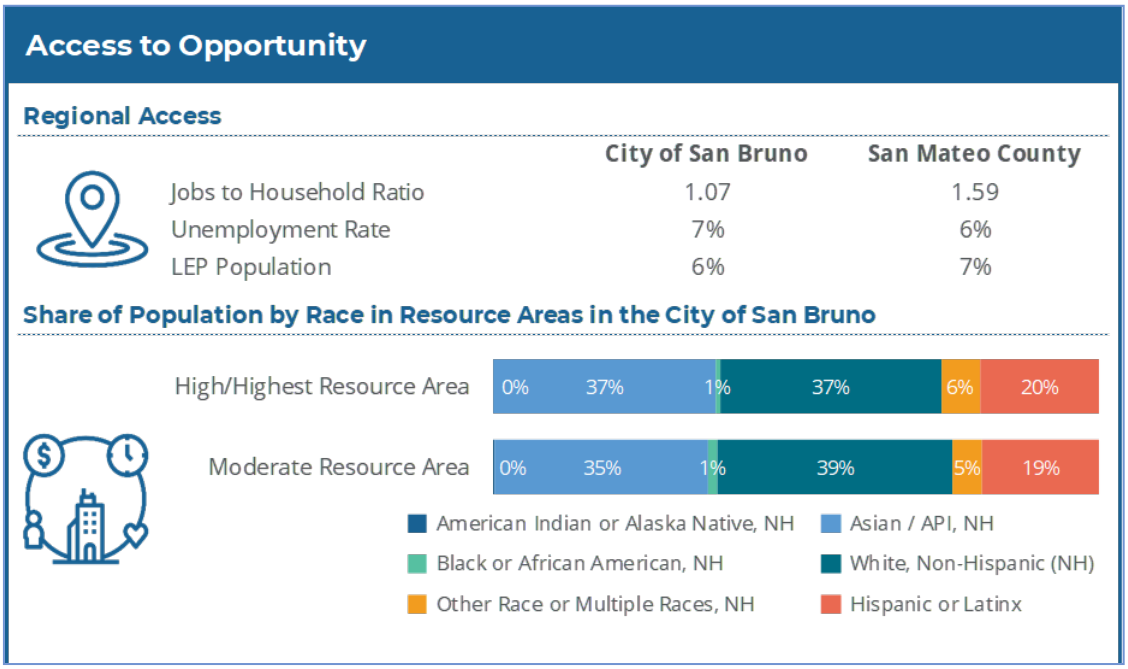


Figure 5-9 Access to Opportunity Key Facts

Source: HUD.

How Does San Bruno Compare to Other Jurisdictions and San Mateo County

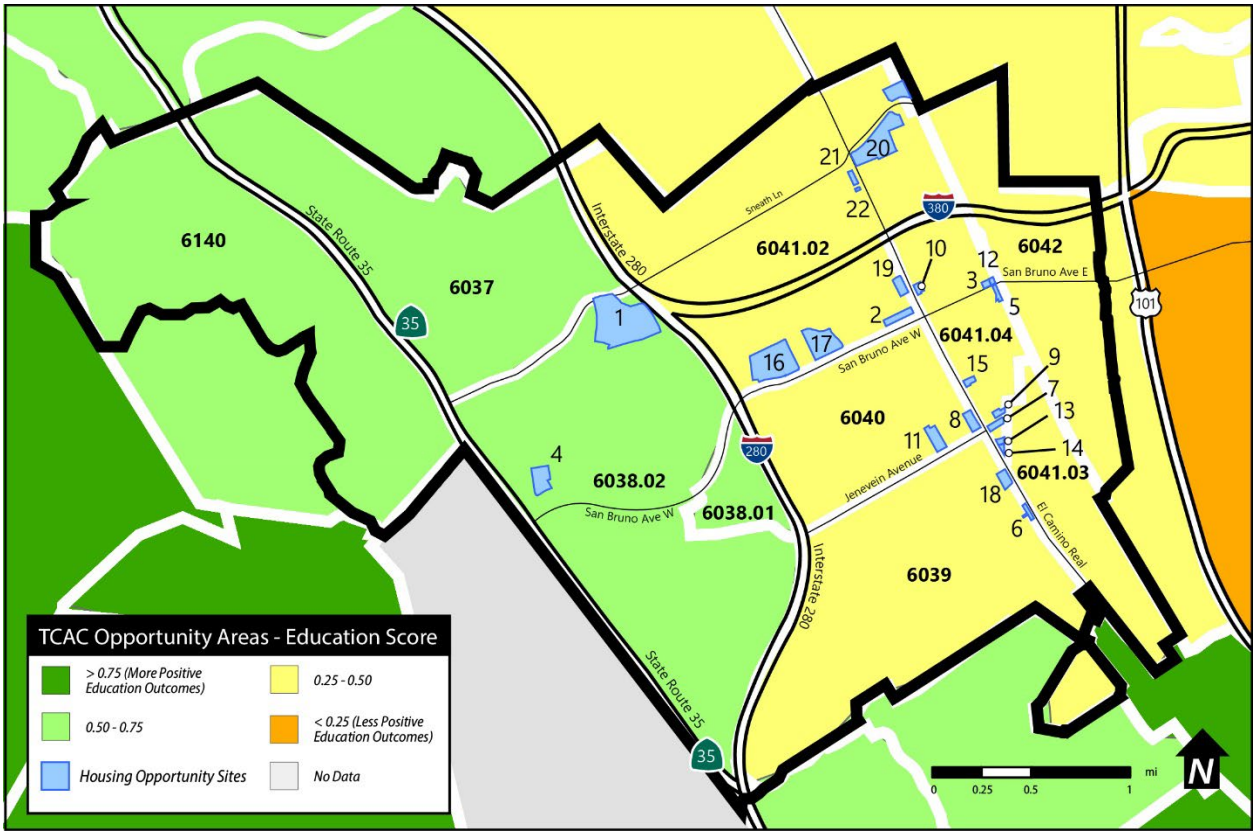
TCAC's composite opportunity score for San Bruno shows census tracts west of Interstate 280 fall within high resource areas while the rest of the City's census tracts east of Interstate 280, west of El Camino Real, and south of Interstate 380 are within moderate resource areas. The tracts east of El Camino Real are designated as low resource areas (Figure 5-14). 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.

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 5-10). 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).



Education Summary

Figure 5-9 TCAC Opportunity Areas – Education Score

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

Figure 5-9 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.

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 5-11). 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.

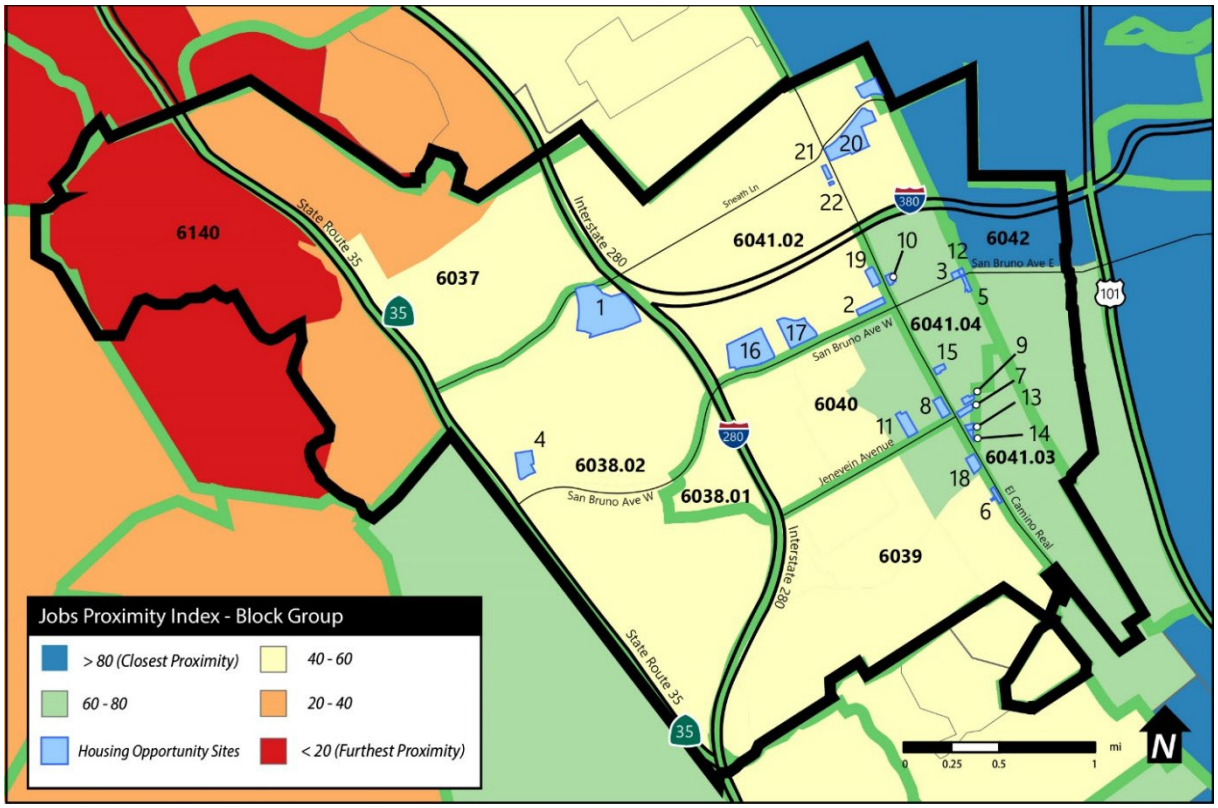


Figure 5-10 Job Proximity Index by Census Tract

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

Figure 5-10 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. Tracts 6042, 6041.04, and 6041.03 are among half of the census tracts west of Interstate 280 that have a low TCAC education score, on average 0.28 – considered to be less positive education outcomes. 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.

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 5-12, 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.

Proposed RHNA Sites Relative to Transportation Summary

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. Census tracts 6038.02 and 6039 do not have the same level of public transportation service as the other tracts in San Bruno. Notably, tract 6038.02 is serviced by a single bus stop; 6039 is serviced by two bus stops. The north portion of tract 6037 is also not served by any public transit. The San Bruno Caltrain station is located in tract 6042, providing service to tracts in proximity including 6041.02, 6041.03, and 6041.04. The San Bruno BART Station is located in tract 6041.02 and offers service to adjacent tracts 6042 and 6041.04. 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.

As shown in Figure 5-12, most of the proposed RHNA sites have access to SamTrans transit stops. 850 Glenview is the only site that is not well served by transit. The proposed sites on or near El Camino Real have relatively good access to the city's Caltrain and BART stations which provide access to the greater region. Additionally, sites near El Camino Real have access to bus routes with frequent headways that qualify as high-quality transit. The sites with better access to public transportation provide greater access to jobs within the city, county, and region, therefore, it is more efficient to site higher density housing in neighborhoods with good transit.

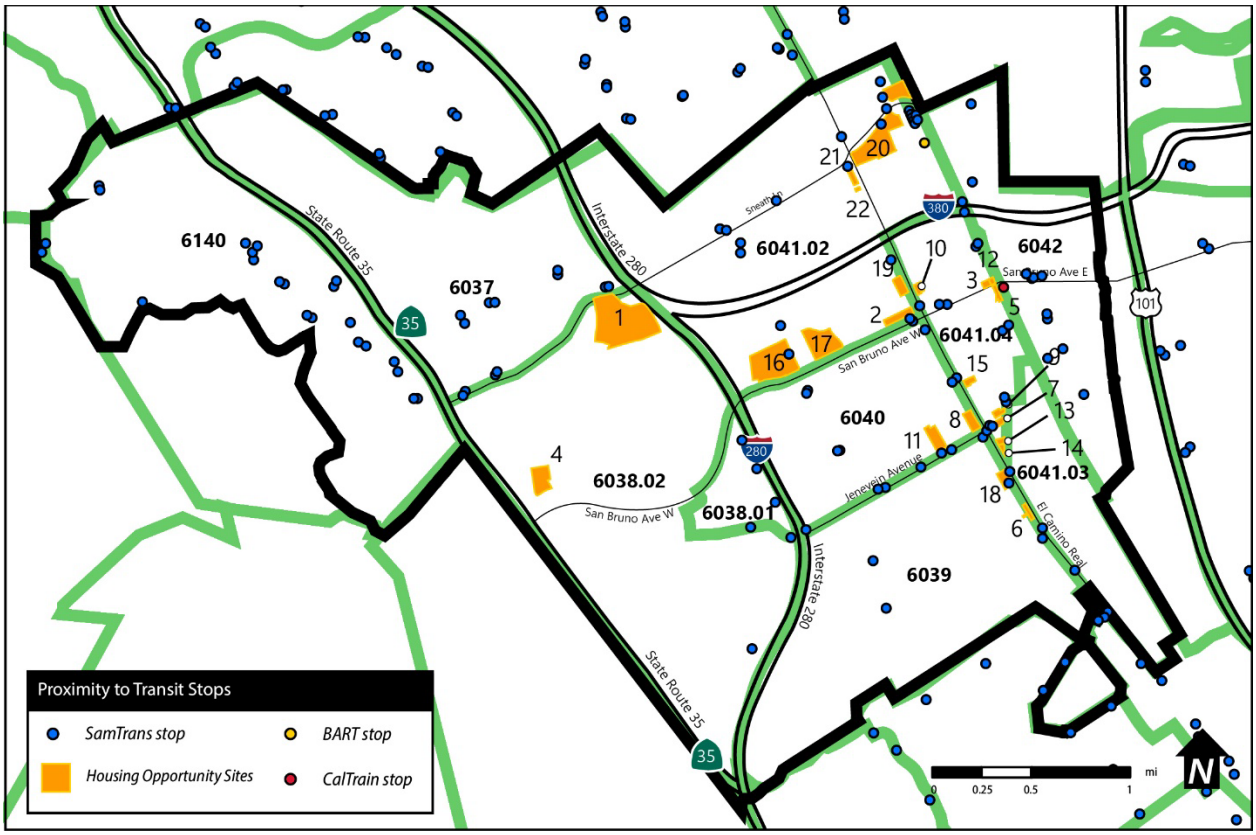


Figure 5-12 Proximity to Transit Stops by Census Tract

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

Access to Opportunity: Environmental Health & Disadvantaged Communities

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 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 proximity to highways, the airport, 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.

San Bruno has one disadvantaged community—the tracts east of El Camino Real and south of Hwy. 380 — 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 5-13). Compared to the northern portion of the county, the only other jurisdiction with census tracts designated as "disadvantaged communities" is South San Francisco.

The Healthy Places Index (HPI) is a new tool that allows local officials to diagnose and change community conditions that affect health outcomes and the wellbeing of residents. The HPI tool was developed by the Public Health Alliance of Southern California to assist in comparing community conditions across the state and combined 25 community characteristics such as housing, education, economic, and social factors into a single indexed HPI Percentile Score, where lower percentiles indicate lower conditions. The HPI uses various indicators to measure community health, including exposure to particulate pollution and drinking water contaminants.

Figure 5-13 shows percentile rankings for California tracts based on the average daily amount of particulate pollution by diesel sources, Figure 5-14 shows rankings based on yearly averages of fine particulate matter concentration from vehicle tailpipes, tires and breaks, powerplants, factories, burning wood, construction, etc., and Figure 5-15 shows rankings based on an index score combining information about 13 contaminants and 2 types of water quality violations that are sometimes found when drinking water samples are tested. The central and eastern sides of San Bruno have higher exposure to Diesel PM and PM 2.5 compared to other San Bruno tracts. This is likely due to the tracts' proximity of the 101 Freeway and Interstate 380. The eastern side of the City also has higher exposure to the San Francisco Airport located southeast of San Bruno.

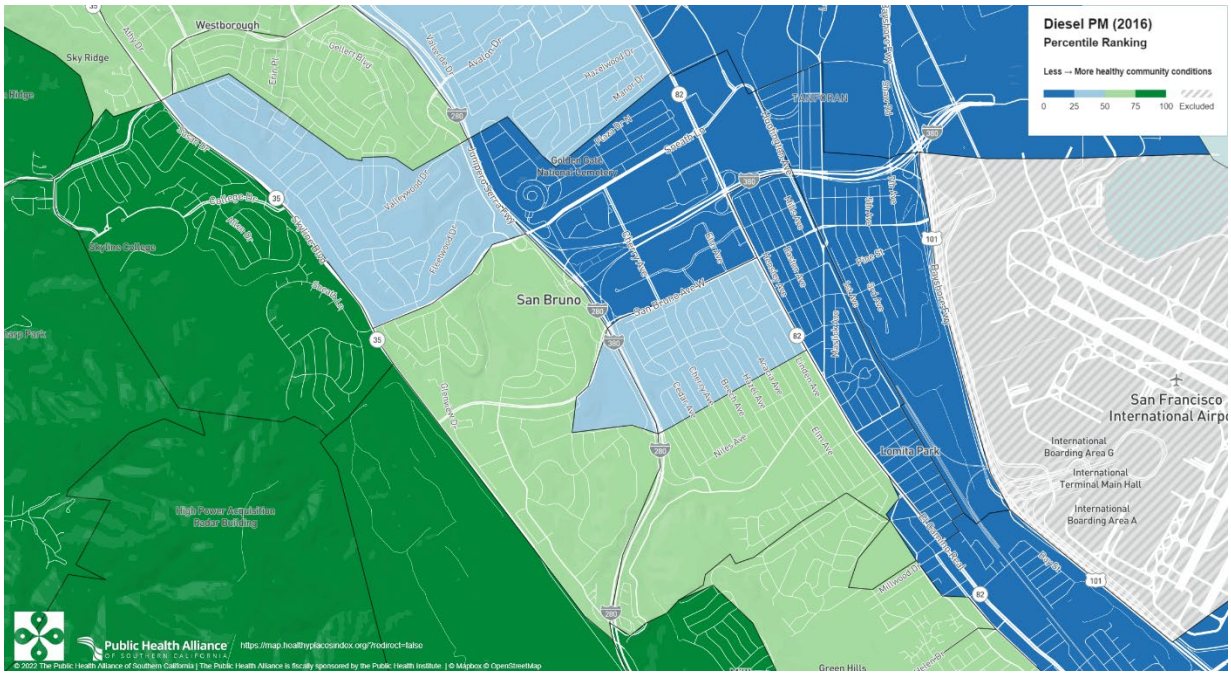


Figure 5-13 Diesel PM Exposure by Census Tract

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

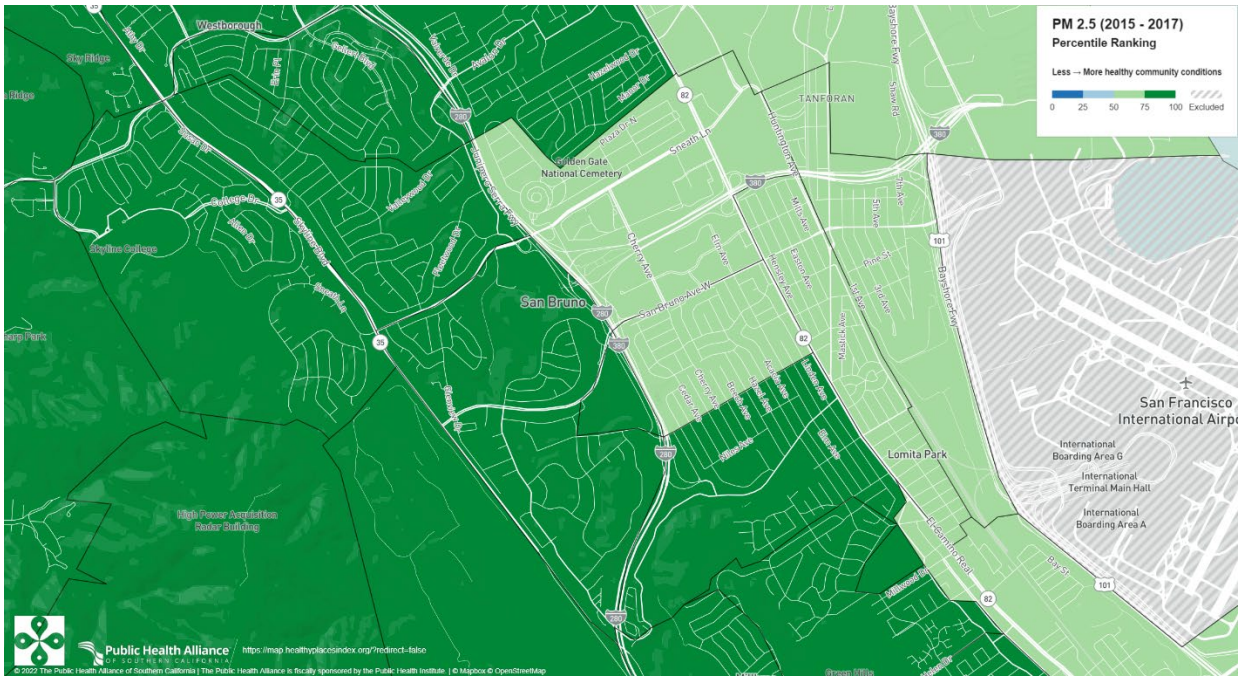


Figure 5-14 PM 2.5 Exposure by Census Tract

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

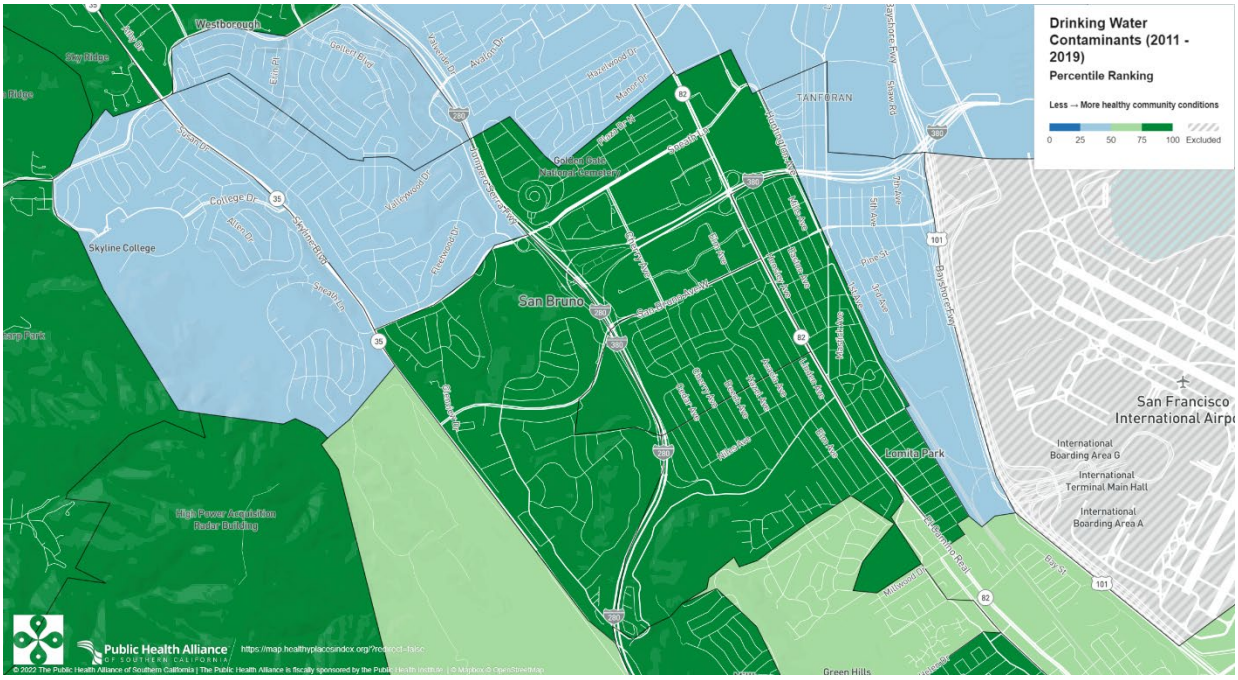


Figure 5-15 Drinking Water Contaminants by Census Tract

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

Environmental Health and Disadvantaged Communities Summary

The census tracts east of El Camino Real (6041.04 and 6041.03) are designated as an SB 535 Disadvantaged Community. As shown in Figure 5-16, several of the city's proposed sites are located within the census tract designated as a disadvantaged community. Together these sites include 411 RHNA Units and are expected to produce 327 moderate and above moderate-income units and 84 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), and continue to participate San Francisco International Airport's noise insulation program in neighborhoods west of El Camino Real to address current environmental challenges (Program 16).

As demonstrated in Figure 5-16, Table 5-7, residents with lower environmental outcomes and high displacement risk live east of El Camino Real. The total population in this area is 12,188 (HCD AFFH Data Viewer). Lower environmental outcomes also correspond to neighborhoods with the highest concentration of Hispanic residents and residents with disproportionate housing needs.

AFFH Policy 2 aims to 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 primarily on the east side of the City. Programs to achieve this policy include Program 16: 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. An action item is to prioritize capital projects that improve landscaping, tree plantings, parks, and pedestrian safety in lower resourced neighborhoods east of El Camino Real.

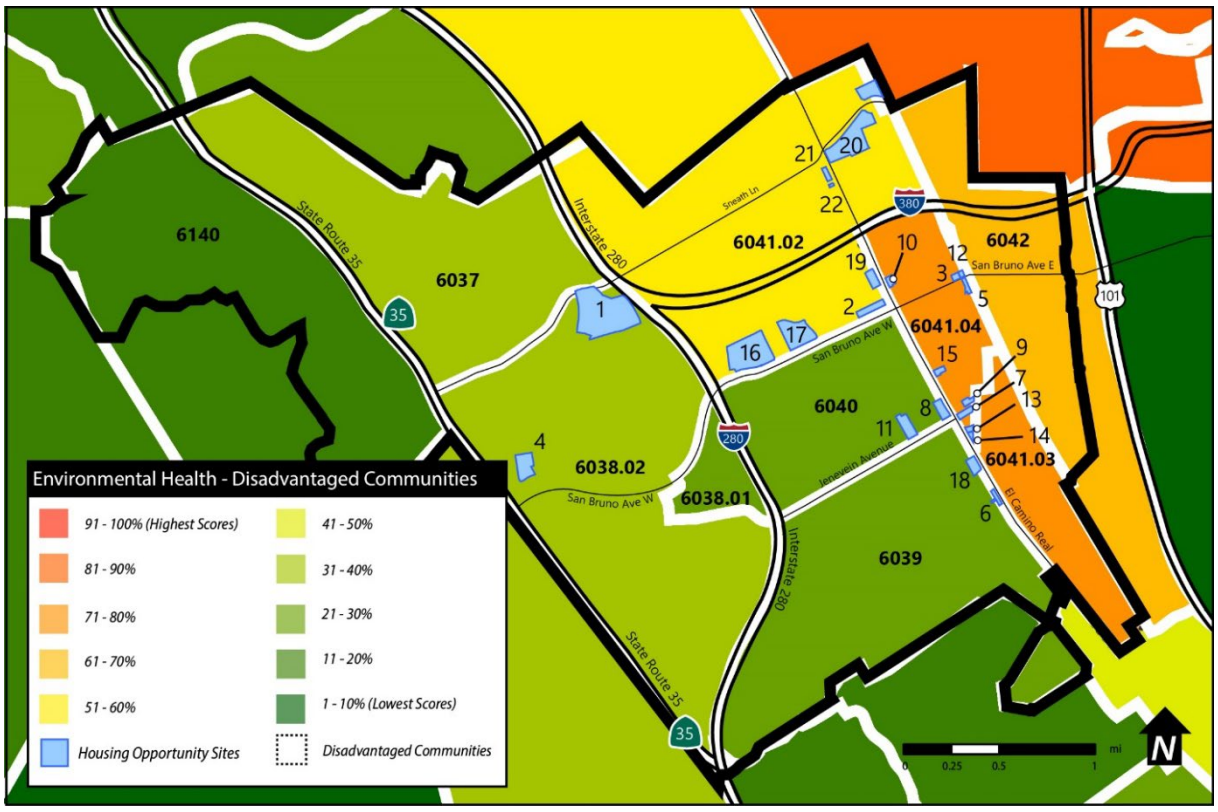


Figure 5-16 Environmental Health and Disadvantaged Communities

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

Access to Opportunity: Site Inventory Analysis Summary

Composite Opportunity Score

The TCAC/HCD map measures access to positive economic outcomes based on incidence of poverty, adult educational former 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 5-17). 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.

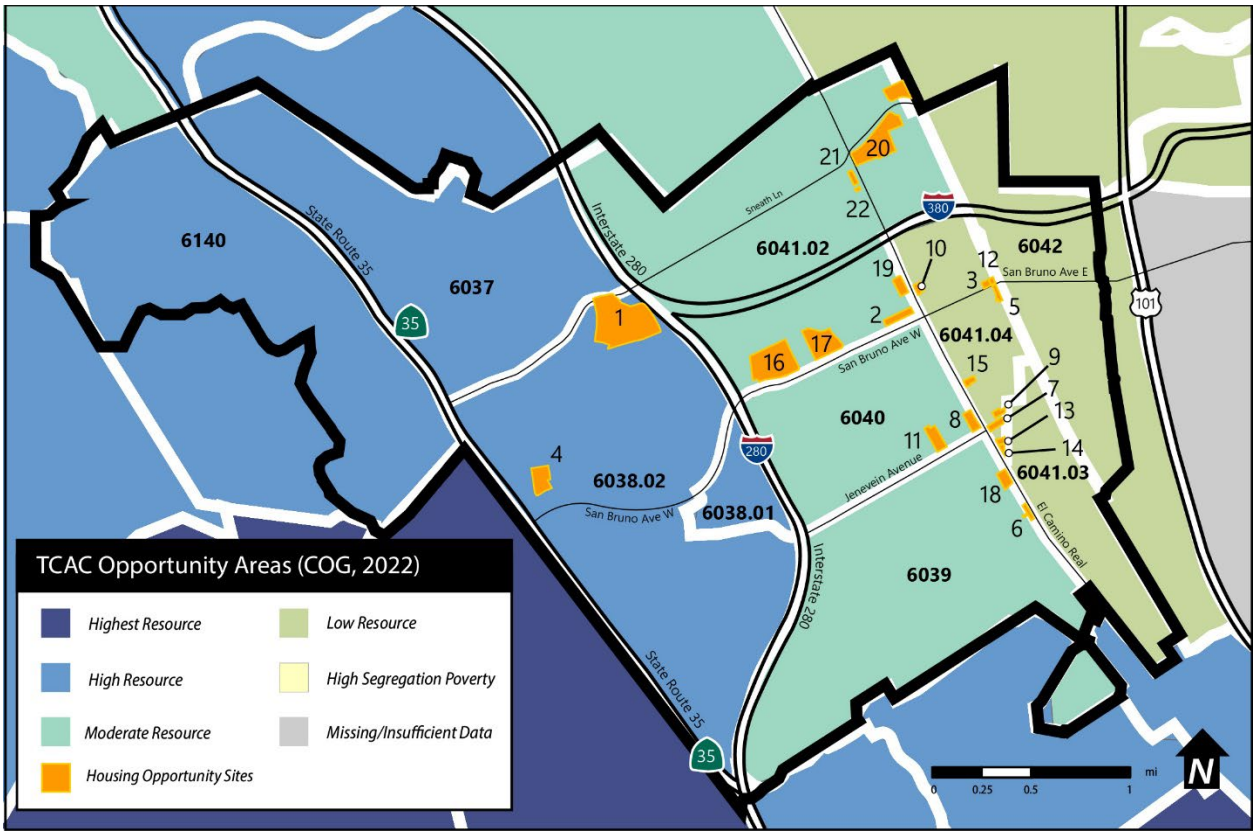


Figure 5-17 TCAC Composite Opportunity Areas by Census Tract

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

TABLE 5-4 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
Educational Opportunity Score	Lower	Lower	Higher	Lower	Lower	Higher	Higher	Lower	Higher
Proximity to Employment	Medium	Closest	Medium	Closest	Closest	Far	Medium	Closest	Medium
Access to Transit	Medium (BART)	Closest	Medium	Closest	Closest	Far	Medium	Closest	Medium
Environmental (CalEnviroScreen)	Medium	Lower	Higher	Higher	Higher	Highest	Higher	Lower	Higher
Composite Opportunity Score	Mod	Low	High	Mod	Mod	High	High	Low	Mod
Disadvantaged Community	No	Yes	No	No	No	No	No	Yes	No
Lower Income Units	813	149	9	69	62	0	0	0	0
Moderate Income Units	345	203	128	65	35	0	0	0	0
Above Moderate-Income Units	826	59	149	32	90	0	0	0	0
Total Units	**1,646**	**429**	**176**	**166**	**134**	**0**	**0**	**0**	**0**
Percent RHNA in Census Tract	**65%**	**17%**	**7%**	**7%**	**5%**	**0%**	**0%**	**0%**	**0%**

Source: City of San Bruno 2023.

Census Tract 6038.02 contains the only sites that are in a highest resource area, the former Engvall MS, totaling 118 units and Glenview Highlands, totaling 58 units, located on the west 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 overall. These sites are anticipated to include 9 low-income units, 18 moderate income units and 149 above moderate-income units in total.

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. 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.

TABLE 5-5 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
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	813	149	9	69	62	0	0	0	0
Moderate Income Units	345	203	128	65	35	0	0	0	0
Above Moderate-Income Units	826	59	149	32	90	0	0	0	0
Total Units	**1,646**	**429**	**176**	**166**	**134**	**0**	**0**	**0**	**0**
Percent RHNA in Census Tract	**65%**	**17%**	**7%**	**7%**	**5%**	**0%**	**0%**	**0%**	**0%**

Source: City of San Bruno 2022.

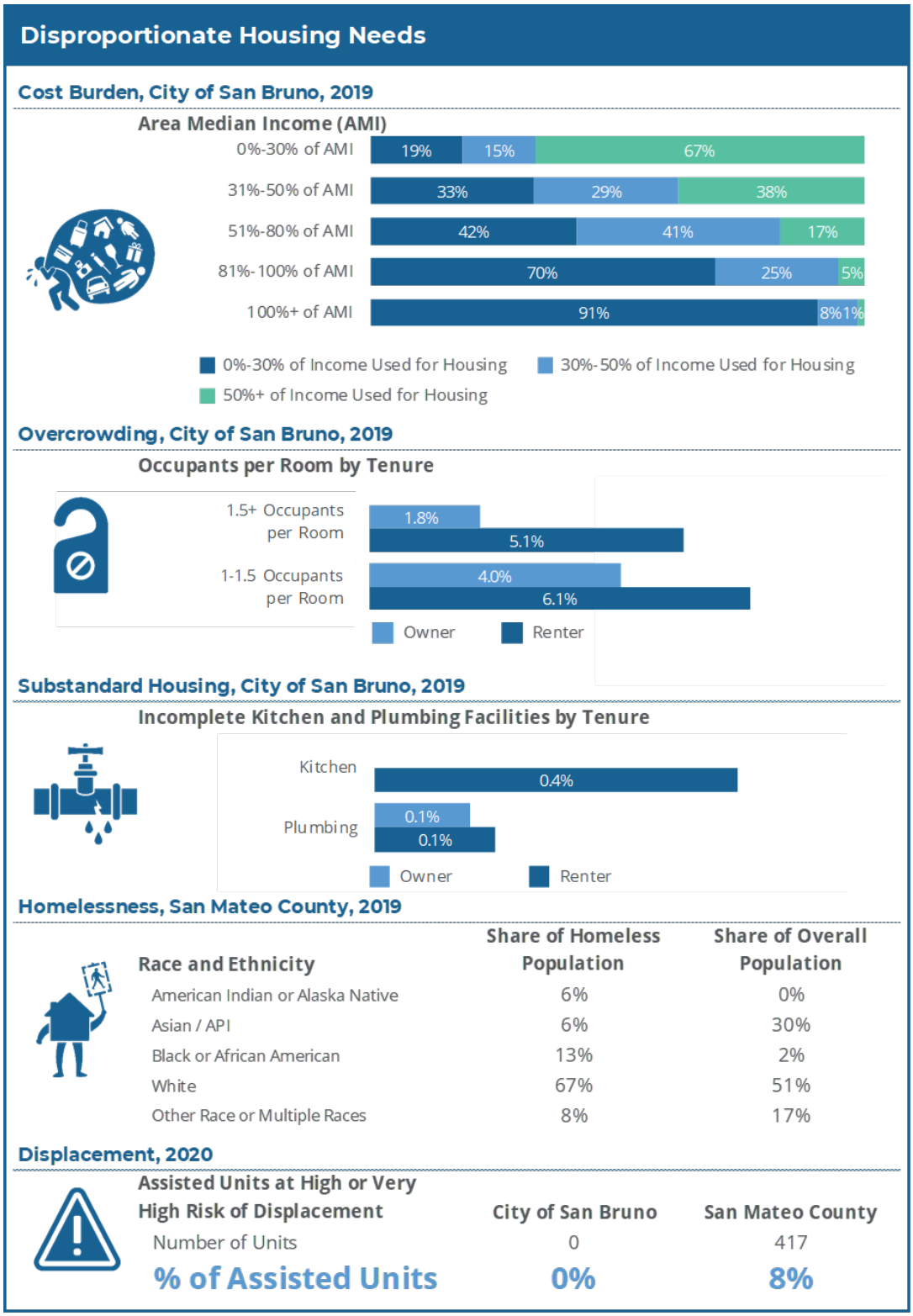


Figure 5-18 Disproportionate Housing Needs Key Facts

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. 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).

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).

Overpayment (Cost Burden)

Figures 4-19 and 4-20 show where the City's proposed RHNA sites are in relation to cost burdened homeowners and renters. As shown in Figure 5-17, 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 1,000 units of lower income housing, as shown in the sites 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.

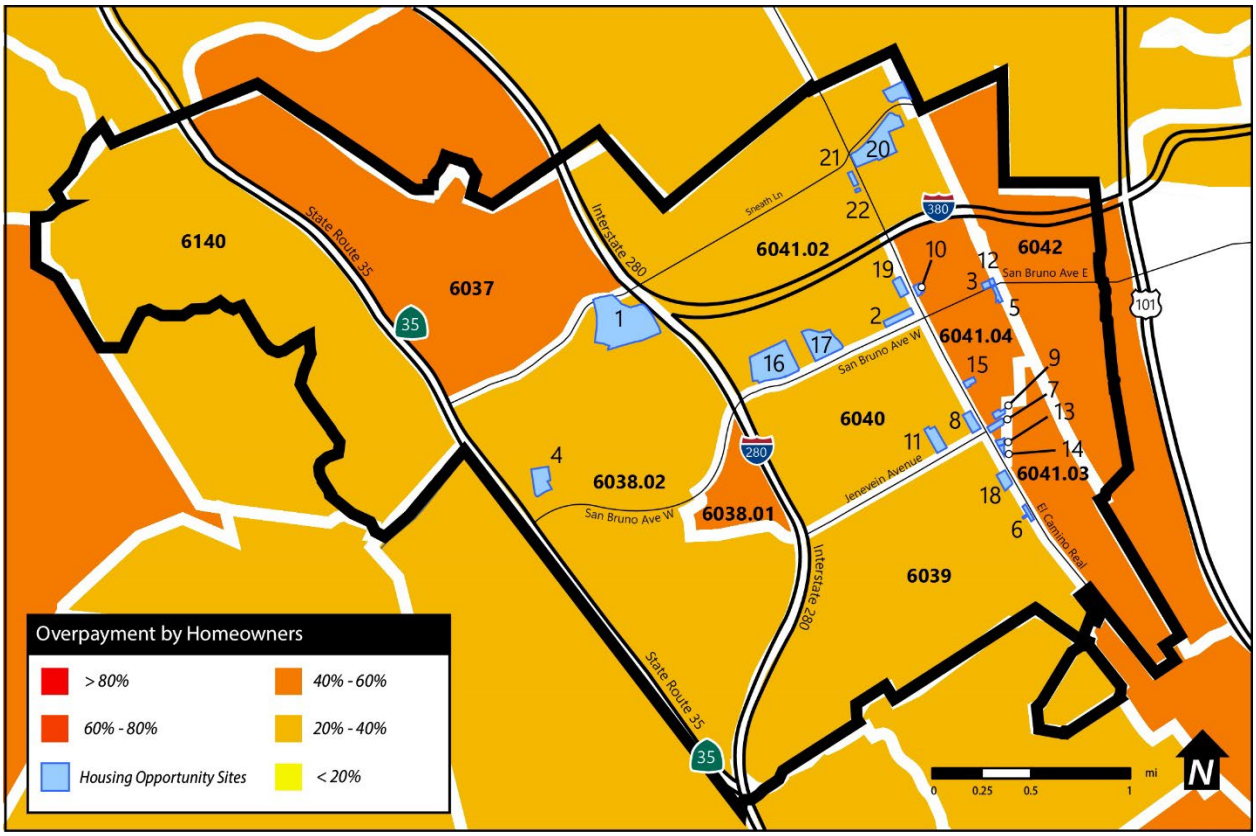


Figure 5-19 Percentage of Cost Burdened Homeowners by Tract

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

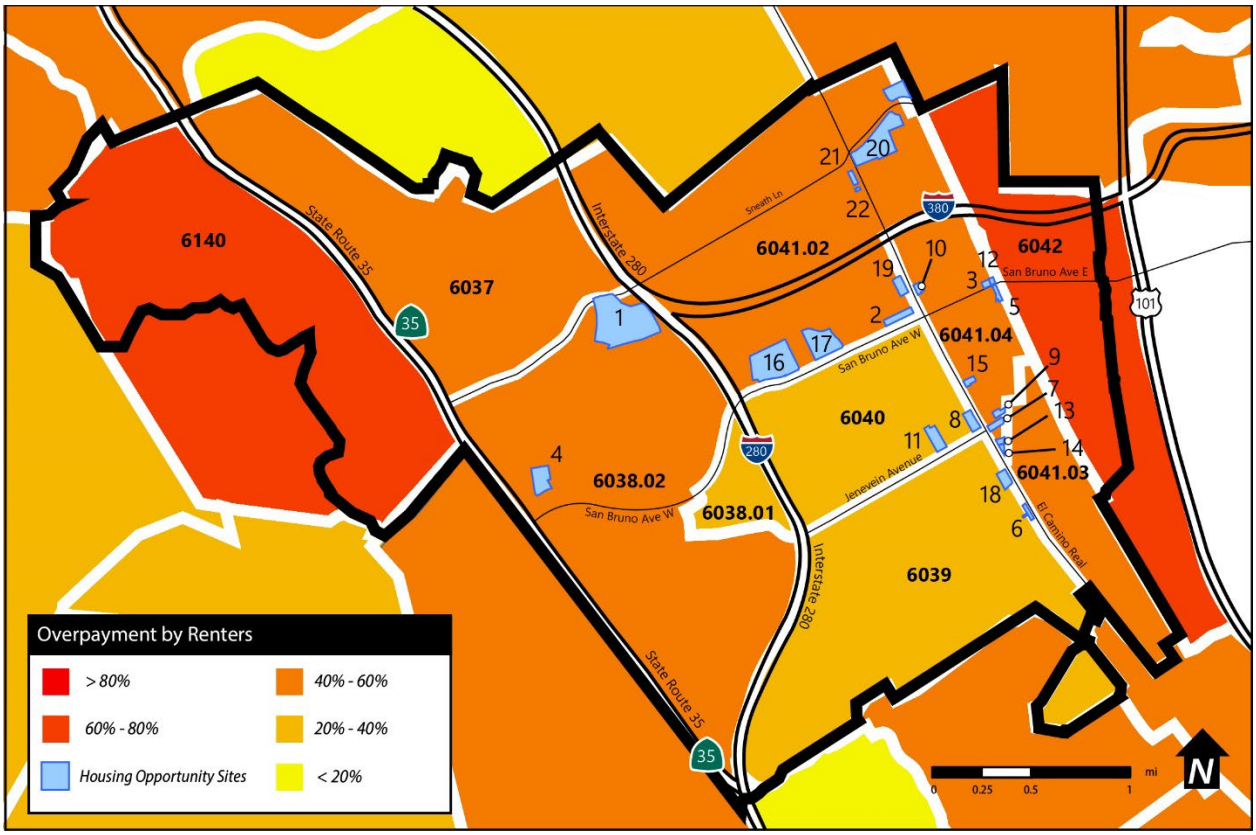


Figure 5-20 Percentage of Cost Burdened Renters by Tract

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

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 5-21). 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. Tract 6042 is the only tract with greater 20% households experiencing overcrowding and . Among the census tracts in San Bruno, tract 6042 is one of two tracts that pay more for rent than any other area.

Overcrowding

More than half the city has an overcrowding rate that is less than the statewide average of 8.2%. However, 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. 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.

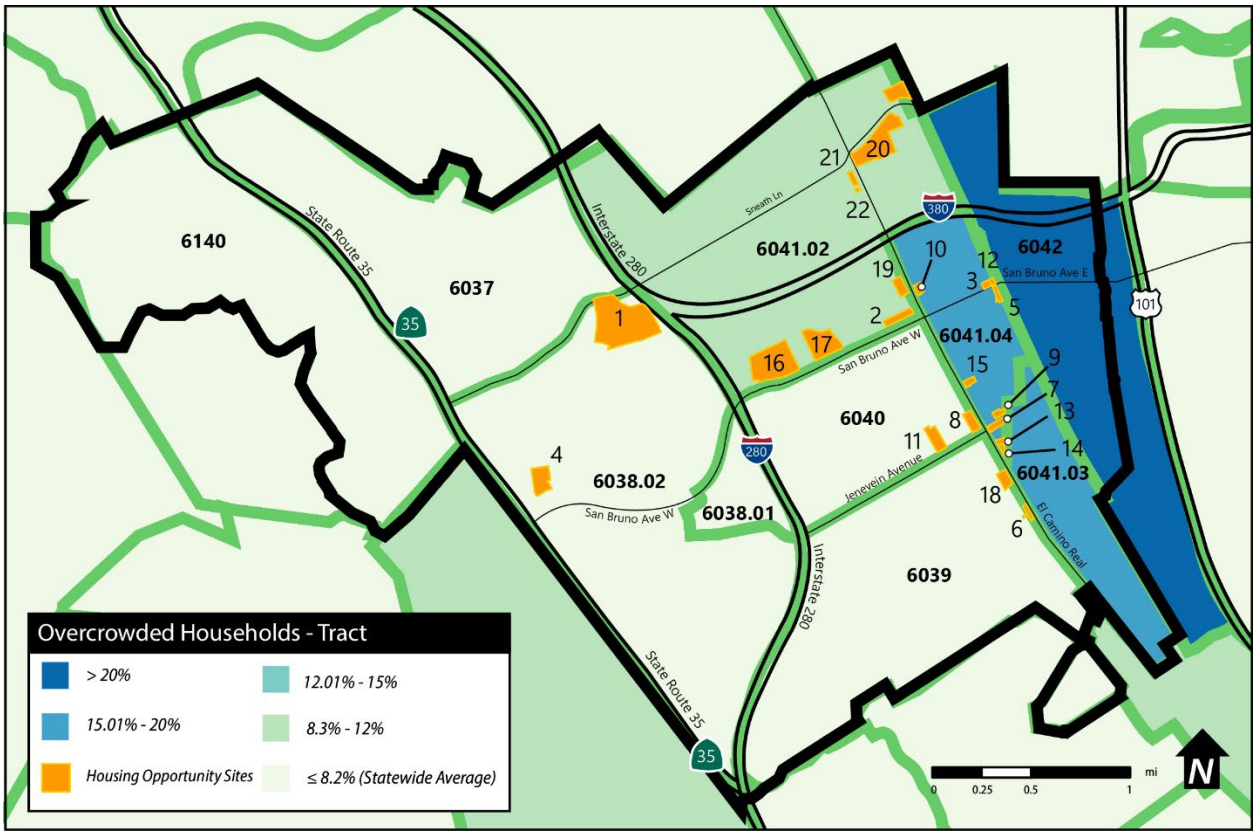


Figure 5-21 Percentage of Overcrowded Households by Tract

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

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. 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.

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.

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).

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).

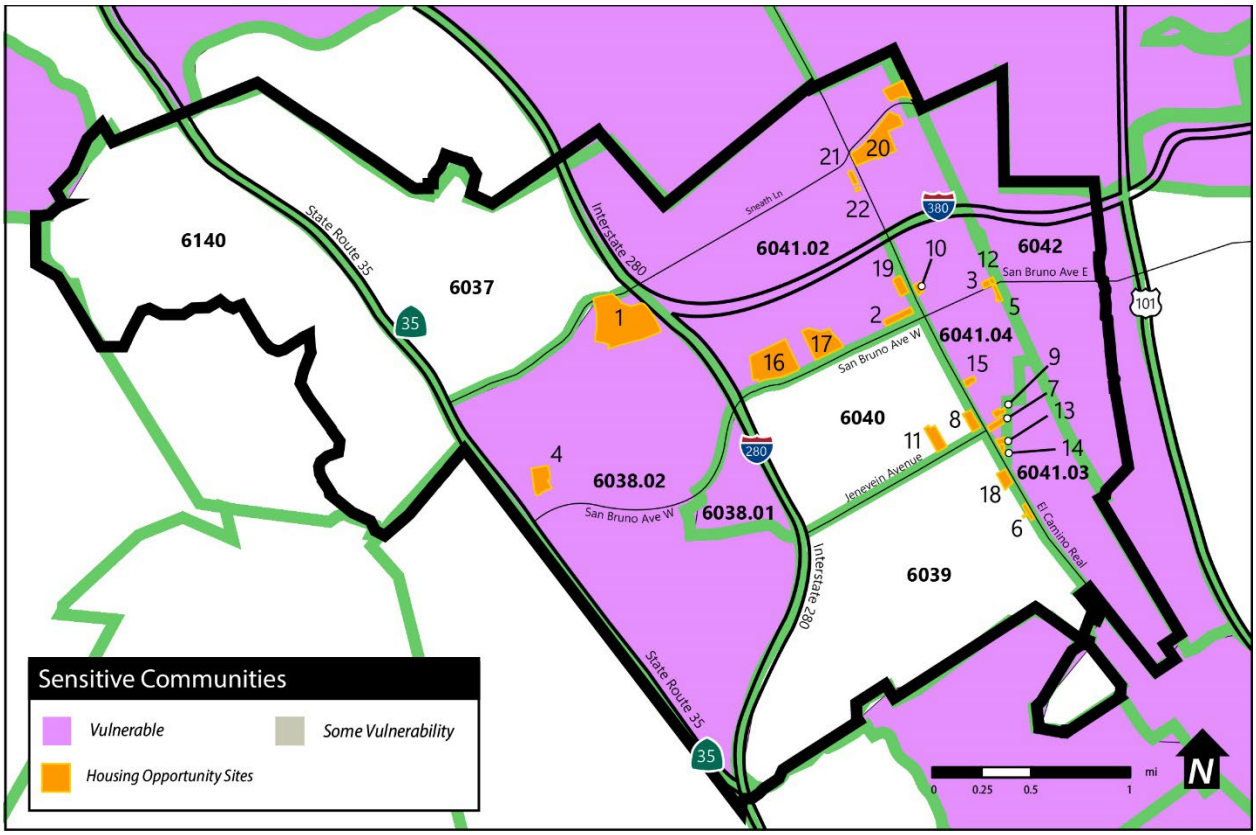


Figure 5-22 Census Tracts Vulnerable to Displacement

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 5-22).

Displacement Due to Disaster

The Federal Emergency Management Agency (FEMA) produces Flood Insurance Rate maps and identifies Special Flood Hazard Areas as part of the National Flood Insurance Program's floodplain management. Special Flood Hazard Areas have regulations that include the mandatory purchase of flood insurance. San Bruno's easternmost blocks (east of 1st avenue) are designated as special flood hazard areas. There are no housing opportunity sites located in a Special Flood Hazard Area. No areas of the city are fire hazard severity zones according to CalFire.

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).

The San Mateo County Multijurisdictional Local Hazard Mitigation Plan (2021) reports past occurrences of natural hazards for which specific damage was recorded since 1954. The report provides a hazard risk ranking for the City of San Bruno which includes a high hazard risk ranking for landslides and earthquakes, a medium hazard risk ranking for sea level rise, severe weather, and 100-year flood, and a low hazard risk ranking for wildfire, tsunami, drought, and dam failure. As mitigation actions addressing these issues are included in the Hazard Mitigation Plan's action plan, the risk of displacement due to disaster is expected to be minimal.

There have been no repetitive loss properties that were identified. The following specific issues that could affect existing housing have been identified based on a review of the results of the risk assessment:

The San Andreas Fault runs roughly 810 miles through California and directly through San Mateo County in a north-south direction. Ground shaking is both a hazard created by earthquakes and the trigger for other hazards, such as liquefaction and landslides. Most earthquake damage results from the shaking caused by seismic waves passing beneath buildings, roads, and other structures.

While the entire County experiences shaking during earthquakes, areas of liquefaction experience even greater shaking. Areas with the greatest susceptibility to liquefaction are generally underlain by soft soils, mud (along the Bay margin), and artificial fill. Liquefaction is a phenomenon involving the loss of shear strength of a soil. Liquefaction commonly causes lack of support for structures located on the liquefiable soils and can cause structural damage to buildings, bridges, and roads, as well as damage to underground pipes.

The easternmost border of San Bruno has the greatest susceptibility to liquefaction. Landslides may occur on steep slopes on the western side of the city adjacent to open spaces. Loss of strength in sensitive soils can also cause landslides and other ground failures. No opportunity sites in the San Bruno site inventory are located in any areas designated as "high risk" of liquefication or landslides.

Colma Creek, San Bruno Creek, and Navigable Slough are connected waterways within the cities of South San Francisco and San Bruno that are prone to flooding, especially during high tide levels in the San Francisco Bay. Colma Creek and San Bruno Creek comprise two active flood zones managed by OneShoreline (San Mateo County Flood and Sea Level Rise Resiliency District). OneShoreline is an independent government agency that works across jurisdictional boundaries to secure and leverage public and private resources to address climate change impacts of sea level rise, flooding, and coastal erosion and ensure the long-term resiliency of the region. Many neighborhoods that drain to the San Bruno Creek, particularly the Belle Air neighborhood in San Bruno, have faced chronic and substantial localized flooding.

Special Flood Hazard Areas are presented in Figure 5-23. The Federal Emergency Management Agency (FEMA) produces Flood Insurance Rate maps and identifies Special Flood Hazard Areas as part of the National Flood Insurance Program's floodplain management. Special Flood Hazard Areas have regulations that include the mandatory purchase of flood insurance. A small section of San Bruno, east of 1st Avenue and south of Interstate 380, is considered a special flood hazard area with a 1% or 0.2% annual chance flood hazard. The City's Safety Element also identifies the following areas that occasionally flood due to combined high tides and heavy rain. It is relevant to note that a multi-jurisdictional effort to update the Safety Element is underway.

- Downtown's San Mateo and Mastick Avenues, north of Sylvan Avenue
- Kains Avenue, east of Green Avenue
- First through Seventh Avenues, south of Pine Street
- City Park, along with portions of Crystal Springs Road
- Magnolia Avenue, adjacent to Capuchino High School
- Santa Helena and San Juan Avenues, as well as Millbrae neighborhoods to the south

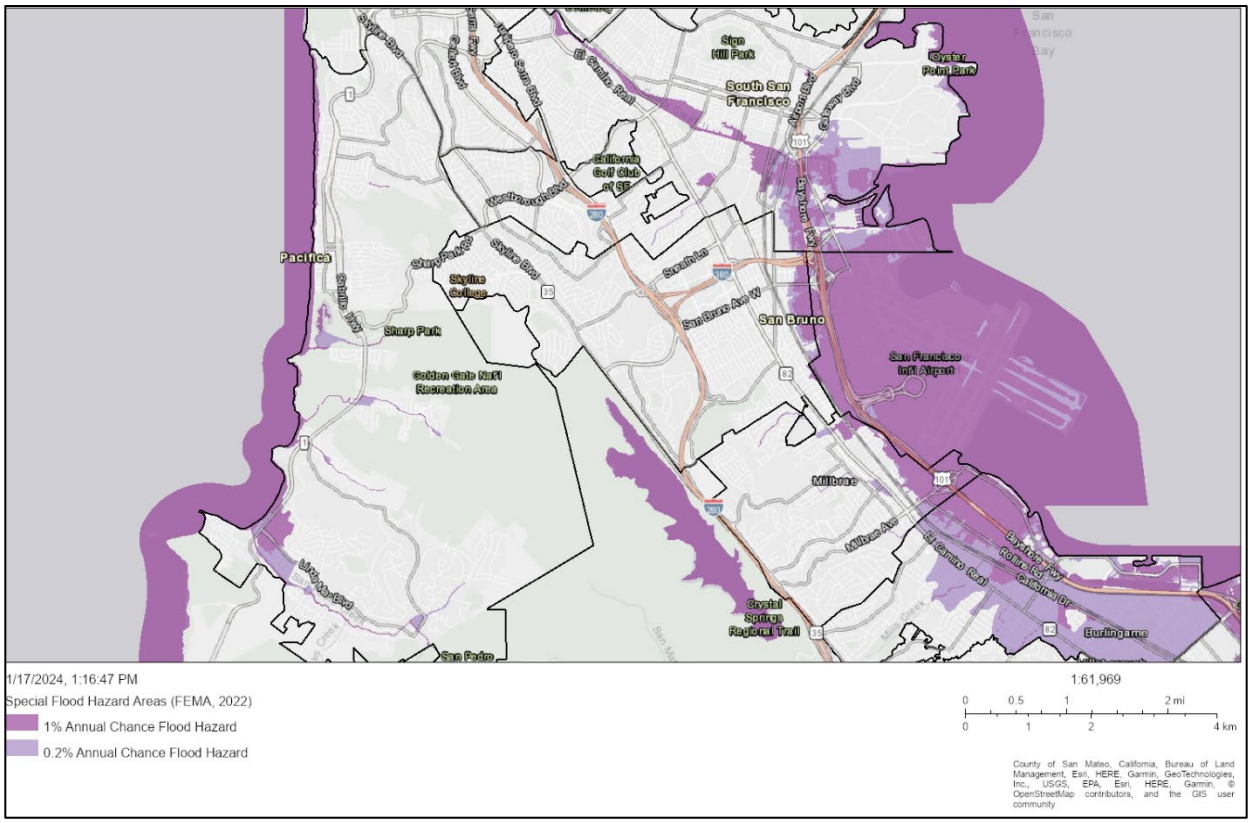


Figure 5-23 Special Flood Hazard Areas (2022)

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

Figure 5-24 shows Fire Hazard Severity Zones designated by CalFire. A Fire Hazard Severity Zone (FHSZ) is a mapped area that designates zones (based on factors such as fuel, slope, and fire weather) with varying degrees of fire hazard (i.e., moderate, high, and very high). FHSZ maps evaluate wildfire hazards, which are physical conditions that create a likelihood that an area will burn over a 30- to 50-year period. They do not take into account modifications such as fuel reduction efforts. The State Fire Marshal is mandated to classify lands within State Responsibility Areas into Fire Hazard Severity Zones (FHSZ). There are no Fire Hazard Severity Zones located in the City.

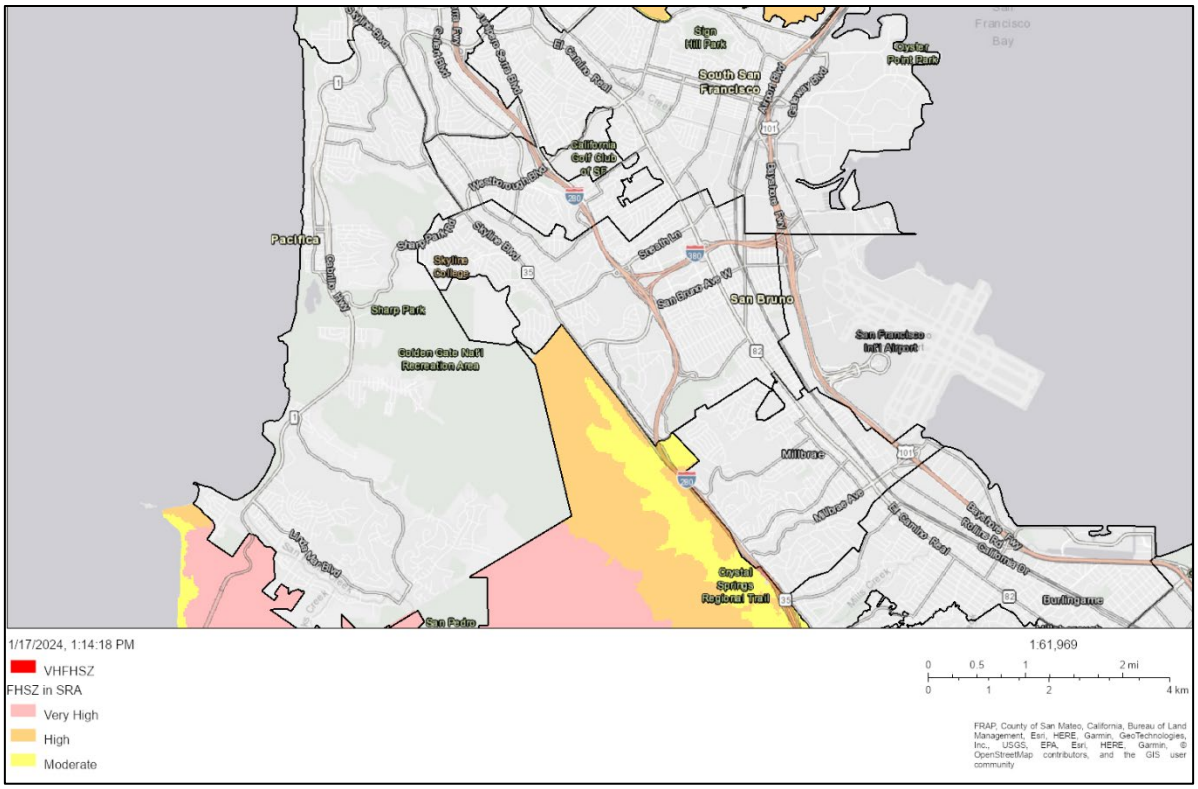


Figure 5-24 Fire Hazard Severity Zones

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

Disadvantaged communities in California are specifically targeted for investment of proceeds from the state's Cap-and-Trade Program. These investments are aimed at improving public health, quality of life and economic opportunity in California's most burdened communities, and at the same time, reducing pollution that causes climate change. The investments are authorized by the California Global Warming Solutions Act of 2006 (Assembly Bill 32, Nunez, 2016). CalEPA formally designated four categories of geographic areas as disadvantaged:

- Census tracts receiving the highest 25 percent of overall scores in CalEnviroScreen 4.0 (1,984 tracts).
- Census tracts lacking overall scores in CalEnviroScreen 4.0 due to data gaps, but receiving the highest 5 percent of CalEnviroScreen 4.0 cumulative pollution burden scores (19 tracts).
- Census tracts identified in the 2017 DAC designation as disadvantaged, regardless of their scores in CalEnviroScreen 4.0 (307 tracts).
- Lands under the control of federally recognized Tribes. For purposes of this designation, a Tribe may establish that a particular area of land is under its control even if not represented as such on CalEPA's DAC map and therefore should be considered a DAC by requesting a consultation with the CalEPA Deputy Secretary for Environmental Justice, Tribal Affairs and Border Relations at TribalAffairs@calepa.ca.gov.

Two tracts on the eastern side of San Bruno are considered disadvantaged communities based on this criteria (Figure 5-25). This area also has higher flood risks compared to the remainder of San Bruno.

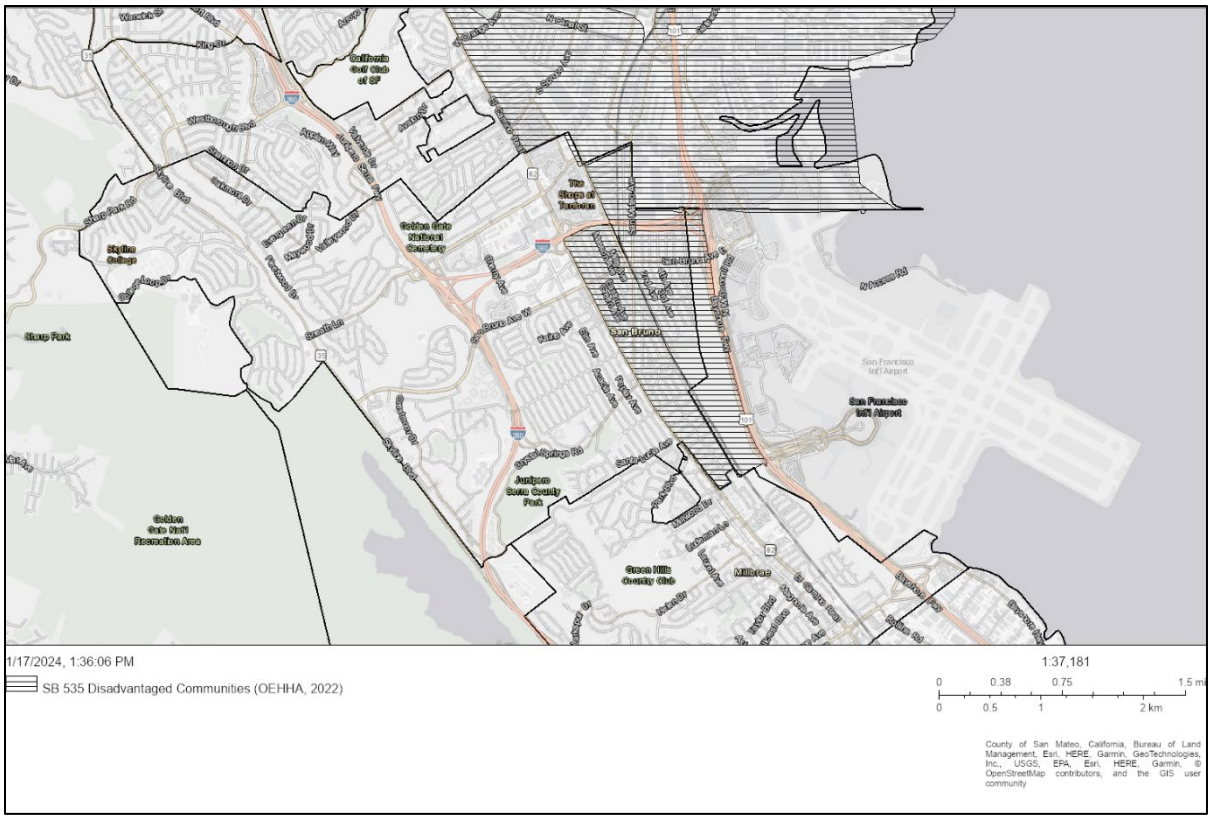


Figure 5-25 SB 535 Disadvantaged Communities (2022)

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

Displacement Summary

The AFFH programs included in this Housing Element 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 capital improvement investments to address the challenges of the areas east of El Camino Real, which are disproportionately occupied by lower-income and Hispanic residents (Program 16).

Additional affordable housing is essential to reducing displacement pressures throughout San Bruno neighborhoods. The production of 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 1,000 lower income units and more than 600 moderate income units, programs and policies to encourage infill and ADU production (Program 4), as well as significant number of lower and moderate-income pipeline projects, which will together help counter displacement vulnerabilities throughout the city. In order to promote the development of lower-income units, Program 18 of the Housing Element commits the City to achieving this goal. Additional actions under the goal of preserving new and existing affordable housing long-term include Programs 1.a – 1.c. In order to help prevent displacement, the Housing Element includes Program 8 to expand access to housing information.

The Housing Element prioritizes the needs of disadvantaged communities affected disproportionately by hazards and disasters. Ensuring resilience of structures and infrastructure and preventing displacement of existing residents due to natural disasters is an important goal in this housing element and the City's focus is on

conserving and improving assets in areas of lower opportunity and concentrated poverty and supporting residents who are at-risk of being displaced. Program 18 is to identify funding and other resources to develop an anti-displacement plan for the most vulnerable neighborhoods east of El Camino Real including displacement due to potential natural disasters.

Examples of programs that will increase resiliency of vulnerable neighborhoods include Programs 1.a. – c. which facilitate the rehabilitation of the City's existing housing stock to correct housing deficiencies, increase the useful life, and increase accessibility for all residents, including an action to provide minor home repairs that will provide life safety and accessibility improvements for lower-income residents. The proposed housing unit rehabilitation programs are targeted to housing units in need of repair in low-resource areas.

Program 2-K promotes sustainable residential development that is energy efficient and reduces greenhouse gas emissions and includes actions to adopt and implement the updated Energy Code and Green Building Standards Codes, to review residential landscape plans for consistency with the City's water efficiency, landscape, irrigation, water conservation guidelines, and provide additional informational brochures about drought-resistant and low-water landscaping options to residents.

Flooding and sea level rise disproportionally impact San Bruno's eastern neighborhoods. Program 16 commits the City to coordinating and collaborating with OneShoreline on regional solutions to address sea level rise and flooding in San Bruno. OneShoreline is already studying three potential project components that could address the significant flooding issues observed in the area:

- A pump station that would carry the excess flows around the existing tide gate where the San Bruno Creek meets the San Francisco Bay, along with a backup generator to ensure continued function during a storm event;
- The rehabilitation of two existing pump stations, built in the 1960s and owned/operated by OneShoreline, that facilitate stormwater drainage from San Bruno to the San Francisco Bay;
- The design and construction of a detention basin at an existing low elevation site along 7th Avenue to increase capacity at the site to store water during high-intensity rainfall events, especially those that occur during high tide.

Disproportionate Housing Needs: Site Inventory Analysis Summary

TABLE 5-6 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
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

Source: City of San Bruno 2022.

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'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. Adding additional low-income options will not exacerbate the concentration of low-income units in the area, buy create a more mixed-income neighborhood.

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 Program 6 (Update Affordable Housing Program) to create a more efficient affordable housing delivery that will ensure that residents with disproportionate needs in the region benefit from the new housing opportunities. Program 6 would also improve the city's management of its affordable housing portfolio and affordable housing fund. Collectively the actions in Program 6 will help the City better support and monitor housing programs that serve extremely low-income residents in the city.

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.

Goal 4 of the City's Housing Element Policies and Programs: Affirmatively Furthering Fair 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, the City has identified 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 the Housing Element, and will help reverse patterns of racial, ethnic, and economic segregation in the city. Some of these programs are targeted at under resourced neighborhoods 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 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.

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 4, "Affirmatively Furthering Fair Housing". Implementing programs that support fair housing and equity in housing were incorporated into this Housing Element's Goals, Policies and Programs 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.

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Public Engagement

Avalon Apartments At The Crossing, City of San Brun

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.

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.

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.

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

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

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

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

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 Lations A Soñar (ALAS) www.alashmb.org
- Community Legal Services www.clsepa.org
- El Comite de Vecinos del Lado Oeste (El Comite) 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

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.

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 a tenant protection 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.

Review Process

- **Draft Housing Element Review**
  - Published for 30-day Public Comment Period (May 24, 2022 – June 24, 2022)
  - City Council Review May 24, 2022
  - Planning Commission Review June 21, 2022
- **State Housing and Community Development (HCD) Reviews**
  - First submittal to HCD (July 8, 2022)
  - First HCD review comments (October 6, 2022)
- **Housing Element Adoption**
  - Planning Commission review and recommendation (January 12, 2023)
  - City Council adoption (January 24, 2023)
- **Housing Element Certification**
  - HCD review of adopted Housing Element (January 30, 2023)
  - HCD review comments on adopted document (March 30, 2023)
  - Revised Adopted Housing available for public review from March 8, 2024 to March 15, 2024. No comments were received.

Summary of Public Engagement and Community Correspondence

The documents below includes all the community feedback, communications and documentation that support the findings and conclusions in this section.

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

City of San Bruno Housing Element Workshop – April 8, 2021: Survey Responses

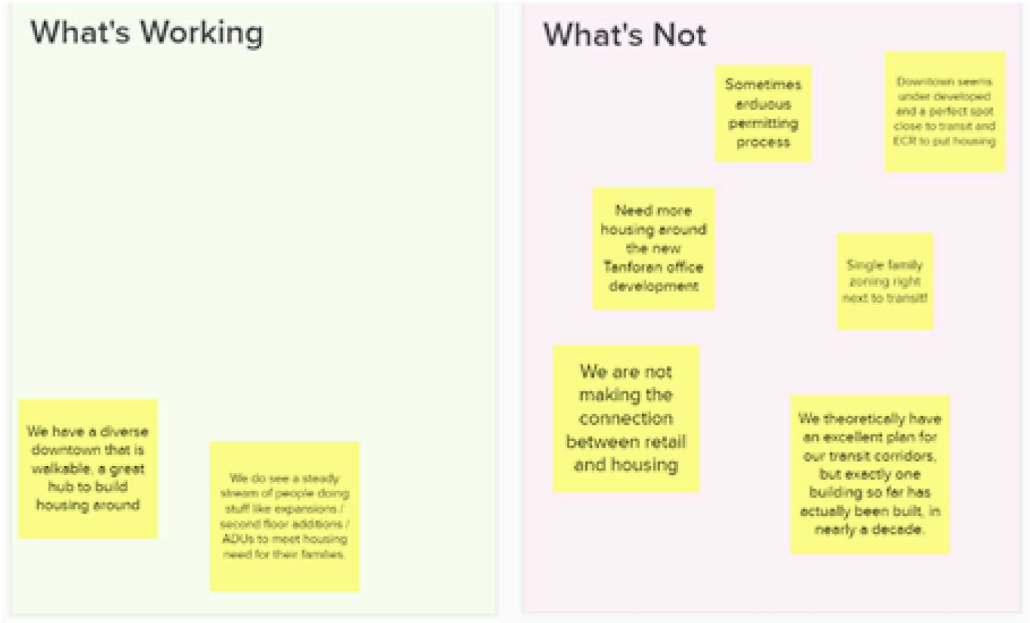
Survey Responses - CCM2 (4.08.21)			
Question (x)	Overall, how would you rate this virtual meeting?	What did you like about the meeting?	Is there anything we could improve?
	4 - Very Good	Good introduction to the subject; seeing the current and expected RHNA numbers was helpful.	
	4 - Very Good	I loved 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.	

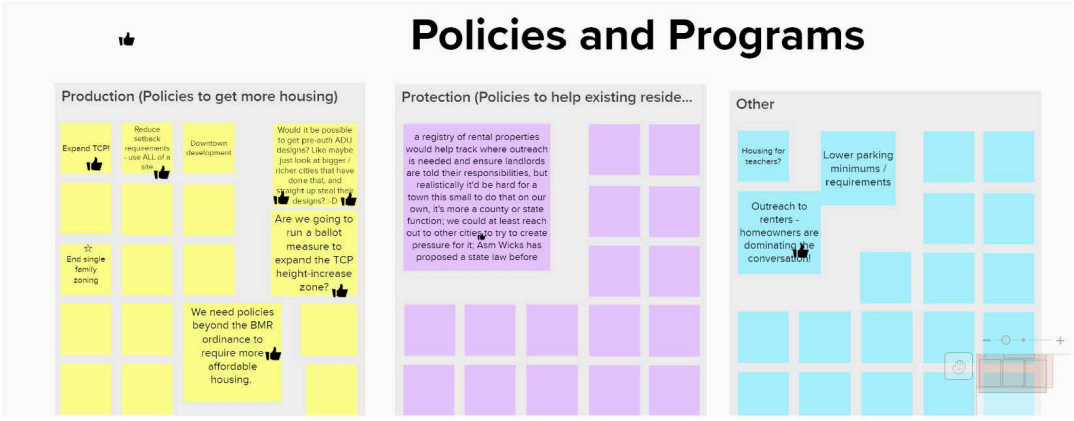
x	5 - Excellent	folks brought a positive attitude	I wonder whether actually doing some cross-community conversations would be useful at some point, as well as city breakouts?
	3 - Good	a chance to hear from others in the county	would like the breakouts to be a mixture of cities so we can hear others concerns
	4 - Very Good	N/A	N/A

Meeting White Board Exercise

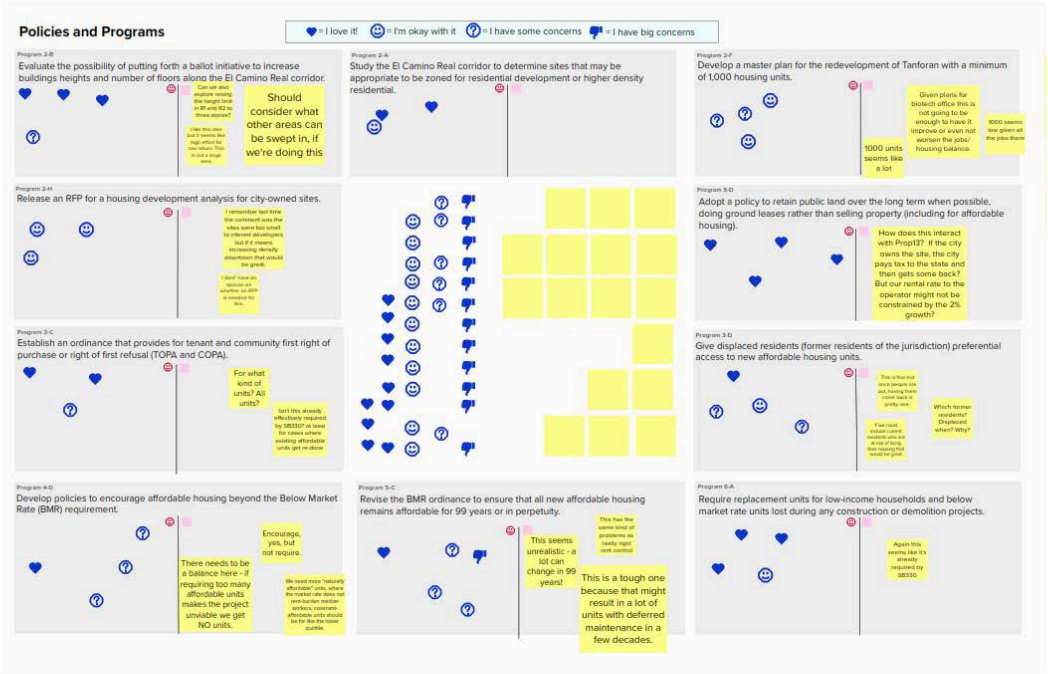
May 4, 2022 HE Workshop

Whiteboard Activity




Policies and Programs
Production (Policies to get more housing)
Expand TCP!
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 might up steal their designs? :D
End single family zoning
Are we going to run a ballot measure to expand the TCP height-increase zone?
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

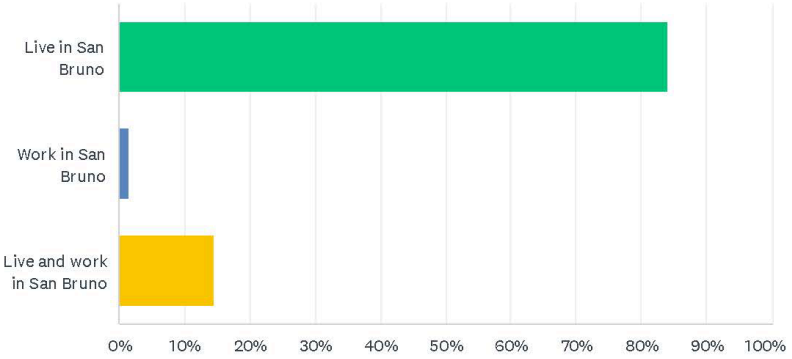


Survey Dara

Housing Element Survey #1

Q1 Do you:

Answered: 444 Skipped: 3

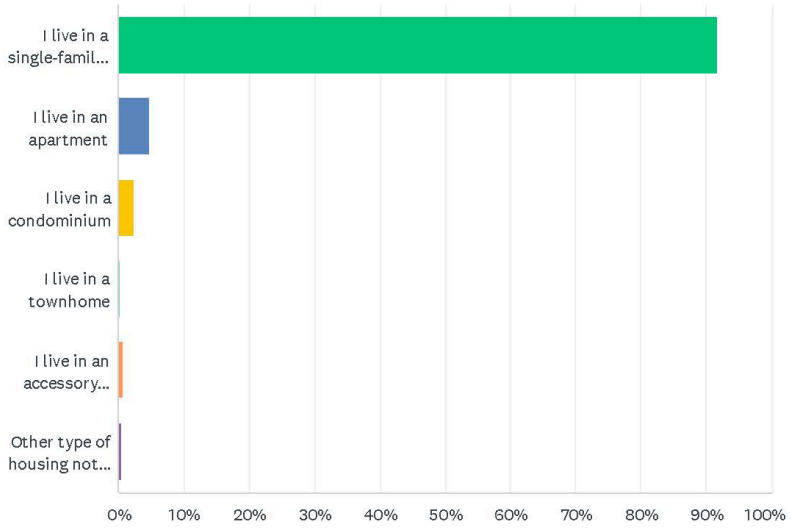


ANSWER CHOICES	RESPONSES	
Live in San Bruno	84.01%	373
Work in San Bruno	1.58%	7
Live and work in San Bruno	14.41%	64
TOTAL		444

Housing Element Survey #1

Q2 Which best describes your current living situation?

Answered: 445 Skipped: 2

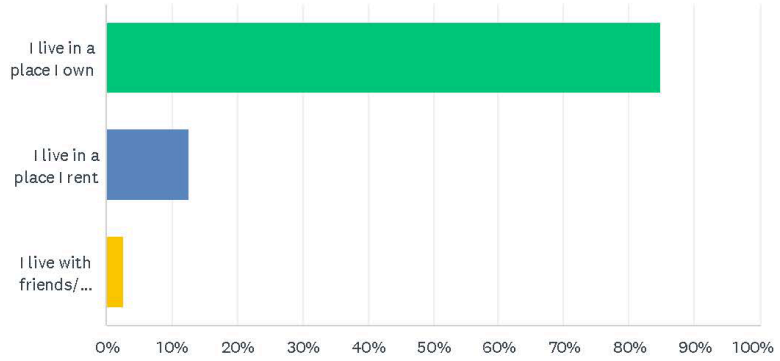


ANSWER CHOICES	RESPONSES	
I live in a single-family home	91.69%	408
I live in an apartment	4.72%	21
I live in a condominium	2.25%	10
I live in a townhome	0.22%	1
I live in an accessory dwelling unit (granny flat/ guest house)	0.67%	3
Other type of housing not listed	0.45%	2
TOTAL		445

Housing Element Survey #1

Q3 Which best describes your current housing situation?

Answered: 444 Skipped: 3

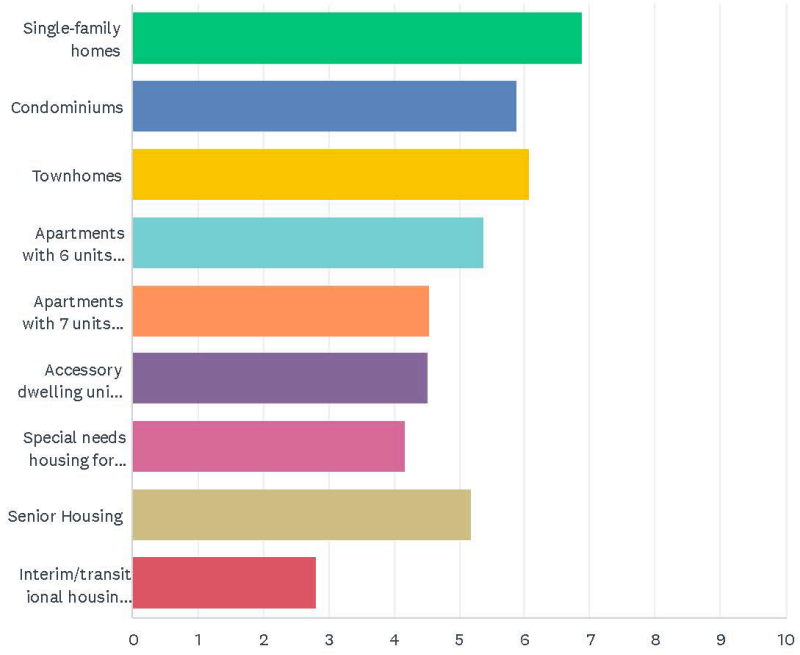


ANSWER CHOICES	RESPONSES	
I live in a place I own	84.91%	377
I live in a place I rent	12.61%	56
I live with friends/ family, and do not own or pay rent	2.48%	11
TOTAL		444

Housing Element Survey #1

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



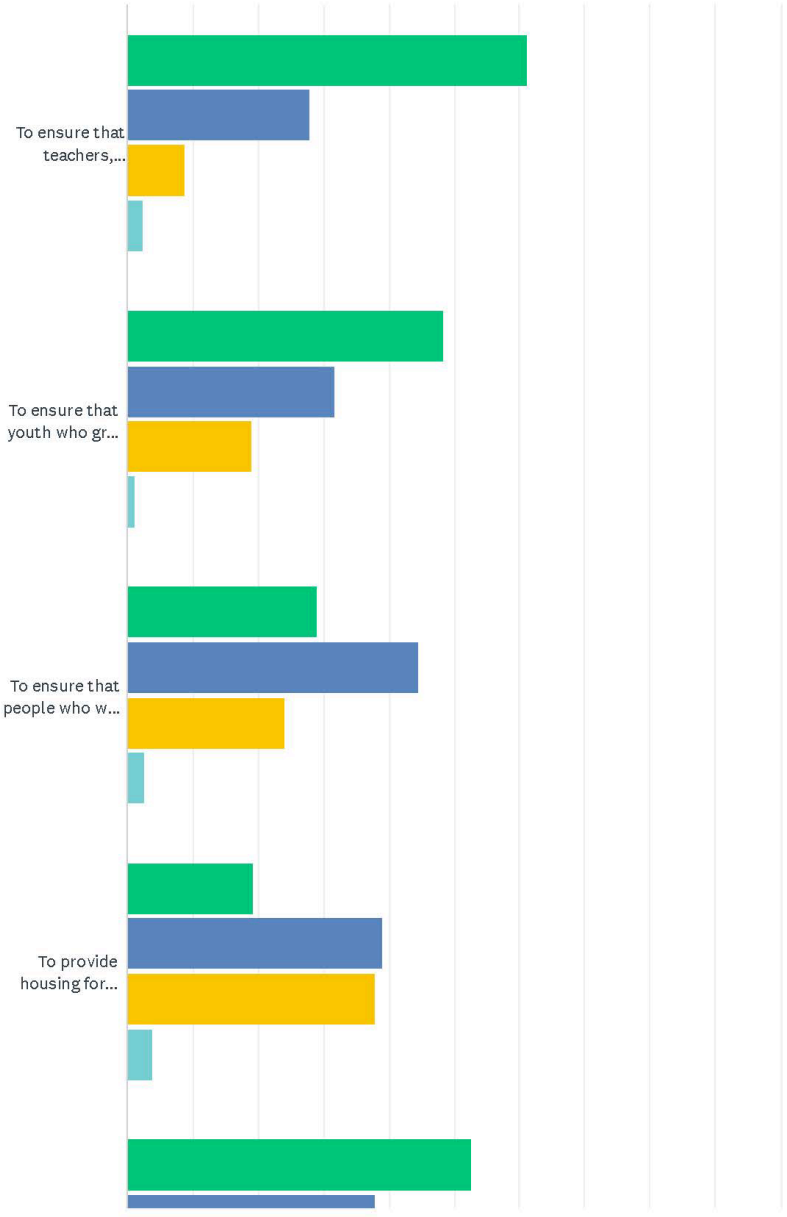
Housing Element Survey #1

	1	2	3	4	5	6	7	8	9	TOTAL	SCOI
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.

Housing Element Survey #1

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



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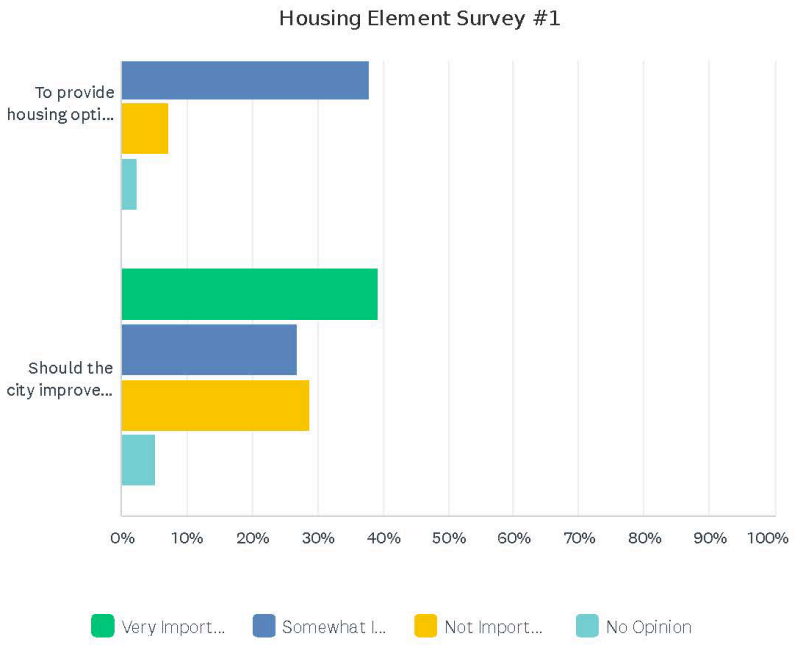
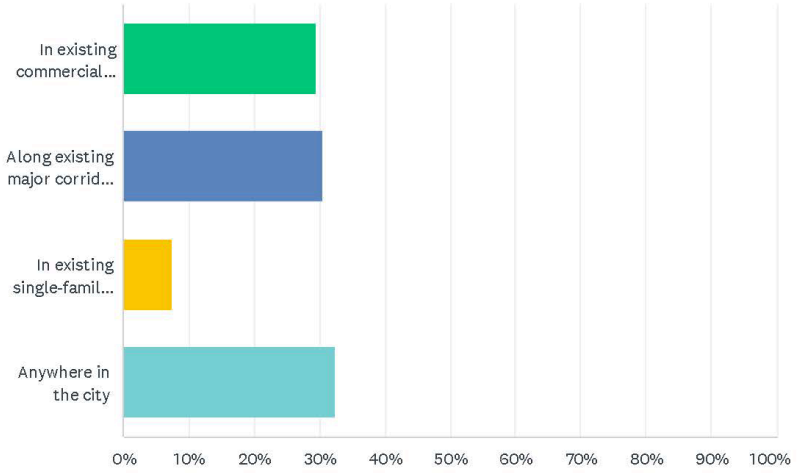


	VERY IMPORTANT	SOMEWHAT IMPORTANT	NOT IMPORTANT	NO OPINION	TOTAL
To ensure that teachers, police, fire, and related safety workers can afford to live in San Bruno	61.12% 272	27.87% 124	8.76% 39	2.25% 10	445
To ensure that youth who grow up in San Bruno can afford to live in San Bruno when they are adults	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

Housing Element Survey #1

Q6 Where should the city focus on increasing housing?

Answered: 425 Skipped: 22

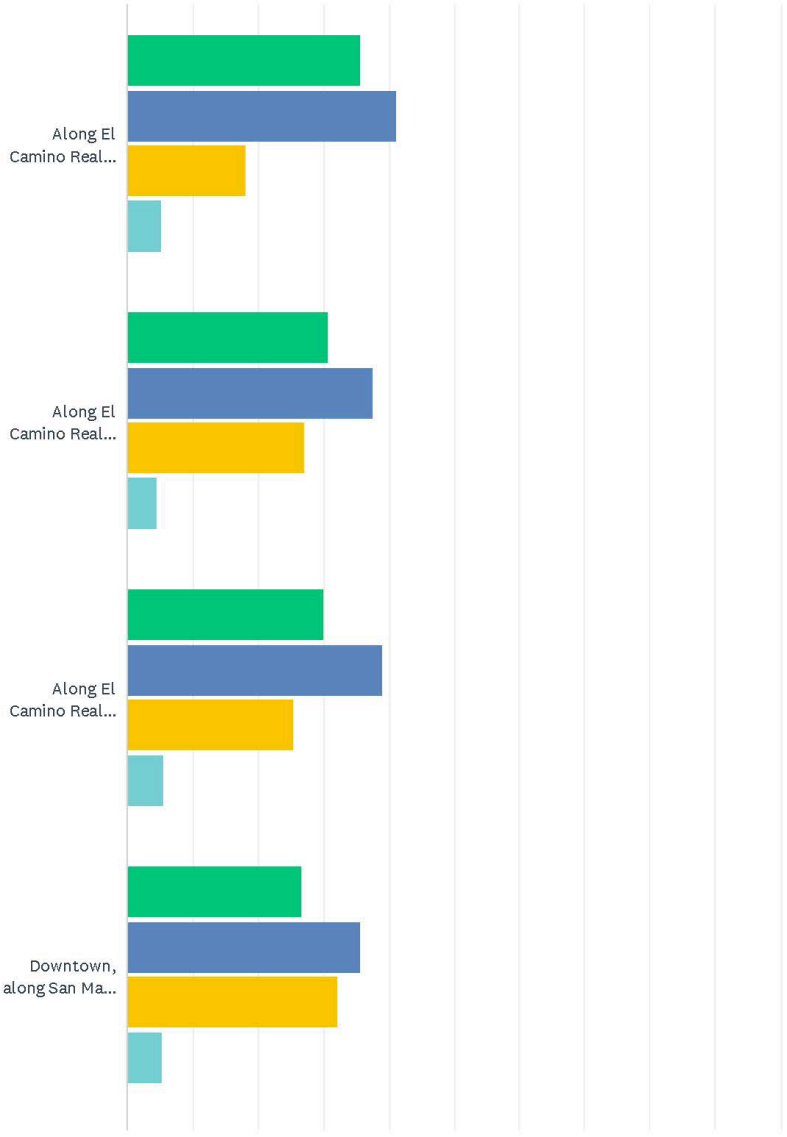


ANSWER CHOICES	RESPONSES	
In existing commercial areas	29.41%	125
Along existing major corridors (San Bruno Avenue, El Camino Real, San Mateo Avenue)	30.59%	130
In existing single-family areas	7.53%	32
Anywhere in the city	32.47%	138
TOTAL		425

Housing Element Survey #1

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



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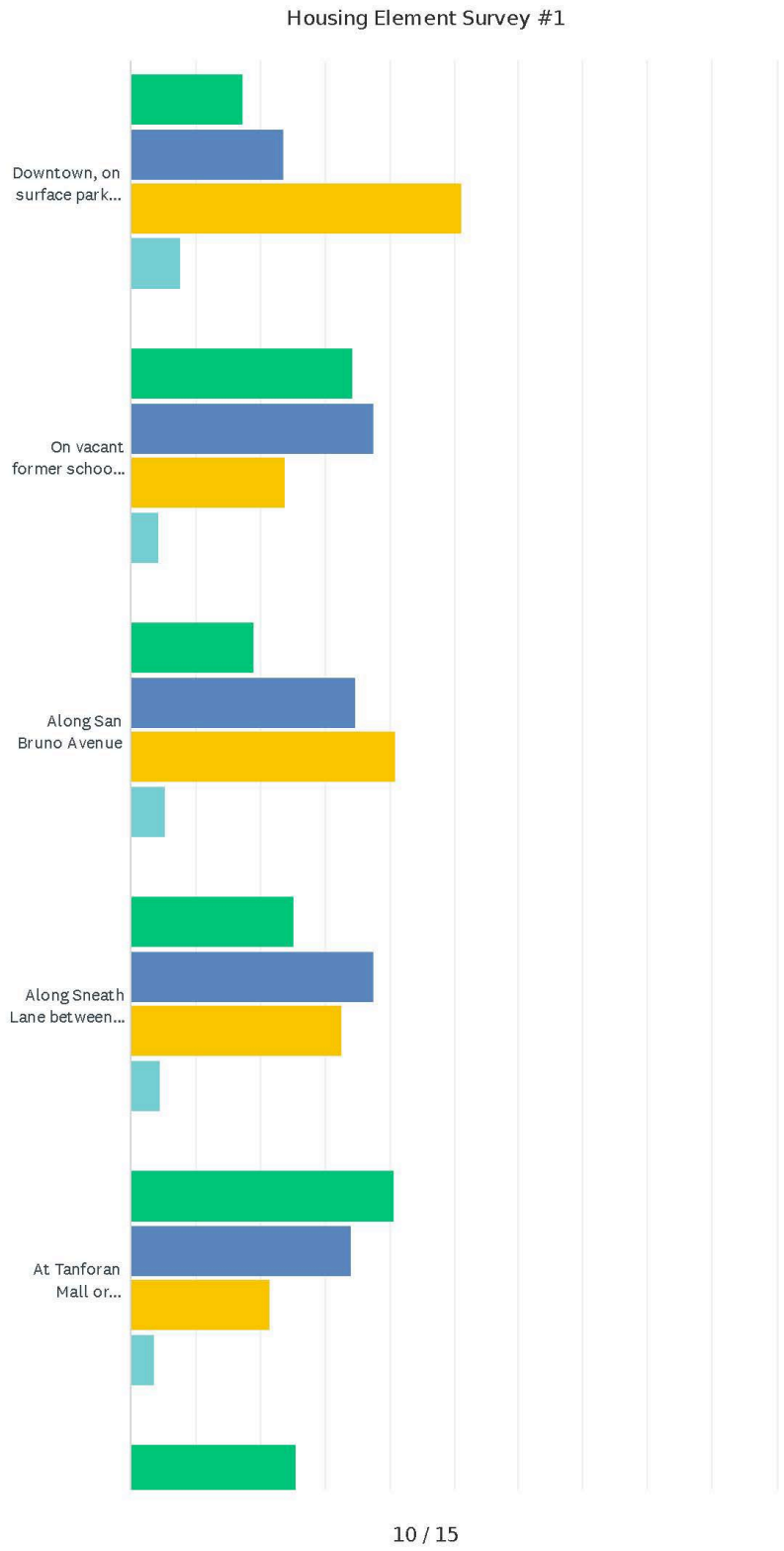
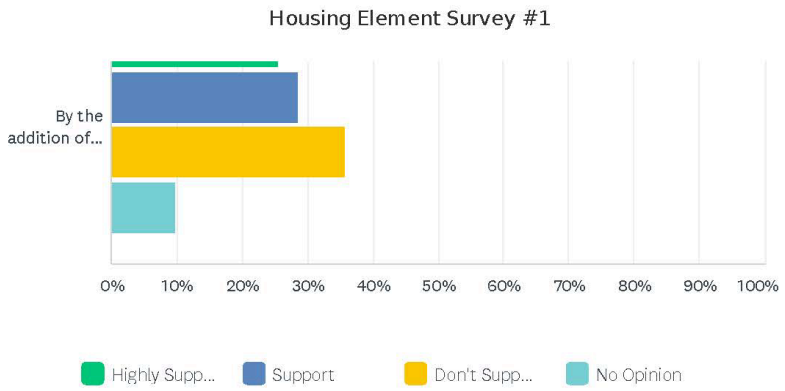

Housing Element Survey #1
Downtown, on surface park...
On vacant former schoo...
Along San Bruno Avenue
Along Sneath Lane between...
At Tanforan Mall or...
10 / 15

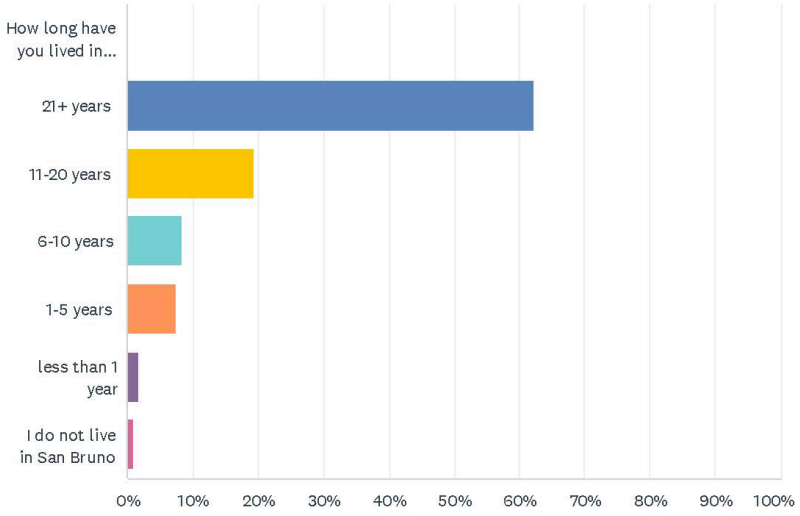


	HIGHLY SUPPORT	SUPPORT	DON'T SUPPORT	NO OPINION	TOTAL	WEIGHTED AVERAGE
Along El Camino Real from Highway 380 north to South San Francisco	35.52% 157	41.18% 182	18.10% 80	5.20% 23	442	1.93
Along El Camino Real between Highway 380 extending south to San Mateo Avenue	30.77% 136	37.56% 166	27.15% 120	4.52% 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

Housing Element Survey #1

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

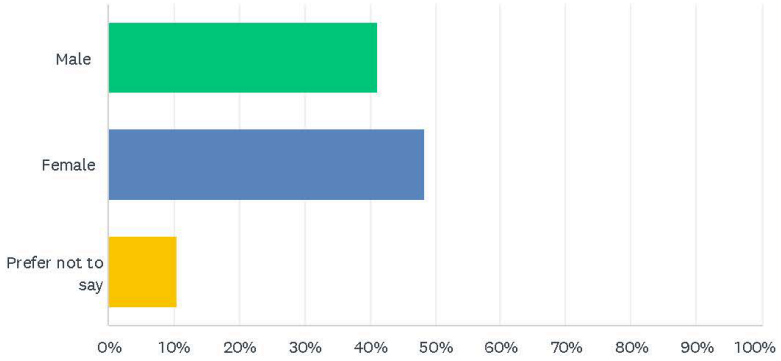


ANSWER CHOICES	RESPONSES	
How long have you lived in San Bruno?	0.00%	0
21+ years	62.16%	276
11-20 years	19.37%	86
6-10 years	8.33%	37
1-5 years	7.43%	33
less than 1 year	1.80%	8
I do not live in San Bruno	0.90%	4
TOTAL		444

Housing Element Survey #1

Q9 Please indicate your gender.

Answered: 438 Skipped: 9

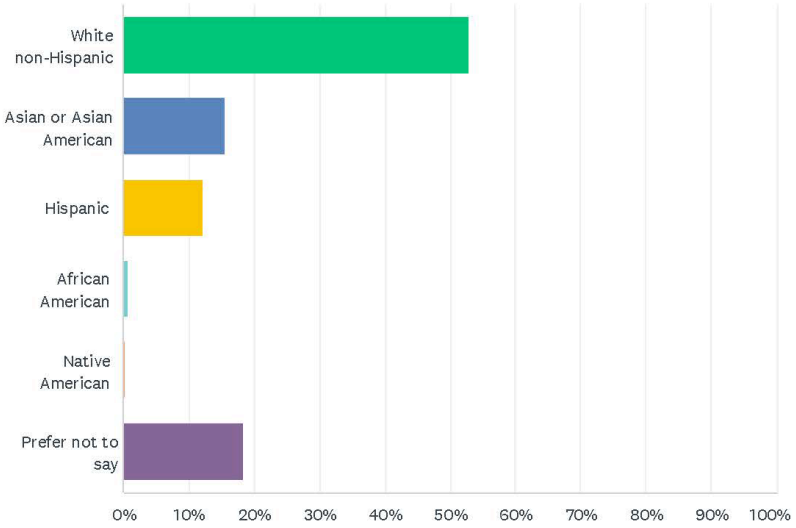


ANSWER CHOICES	RESPONSES	
Male	41.10%	180
Female	48.40%	212
Prefer not to say	10.50%	46
TOTAL		438

Housing Element Survey #1

Q10 How do you identify yourself? (Select all that apply)

Answered: 441 Skipped: 6

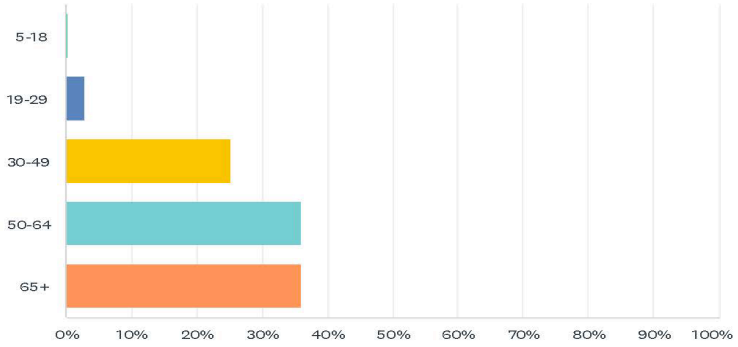


ANSWER CHOICES	RESPONSES	
White non-Hispanic	52.83%	233
Asian or Asian American	15.65%	69
Hispanic	12.24%	54
African American	0.68%	3
Native American	0.23%	1
Prefer not to say	18.37%	81
TOTAL		441

Housing Element Survey #1

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

Summary of 21E Listening Sessions

21 Elements

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/

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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 take areality 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 project 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.

21 Elements

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.

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21 Elements

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

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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

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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, discimination, 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

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- 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

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21 Elements

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

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21 Elements

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

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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

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- 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

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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 duac 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

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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 resioential 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

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- 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

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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

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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?
    - Mental Health Association – access to transit, medical care, grocery stores, pharmacy
    - 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
    - Youth Leadership Institute – parks within or near housing developments are important to young people, new community centers or access to existing ones, high walkability
    - HIP Housing – agree with all mentioned, near schools for family housing, senior centers for senior housing
    - 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

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- 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.

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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

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- 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.

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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

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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-occuring 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.

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- 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

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San Bruno Housing Element Letter- YIMBY Law Greenbelt Alliance

YIMBY LAW GREENBELT ALLIANCE

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)

Tanforan Redevelopment Letter

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=

AIRPORT COMMISSION CITY AND COUNTY OF SAN FRANCISCO
LONDON N. BREED, MAYOR | ELEANOR JOHNS, PRESIDENT | MALCOLM YEUNG, VICE PRESIDENT | EVERETT A. HEWLETT, JR. | JANE NATOLI | JOSE F. ALMANZA | IVAR C. SATERO, AIRPORT DIRECTOR
Post Office Box 8097 San Francisco, California 94128 Tel 650.821.5000 Fax 650.821.5005 www.flysfo.com

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 pertains 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-a11y.pdf

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@flysfo.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

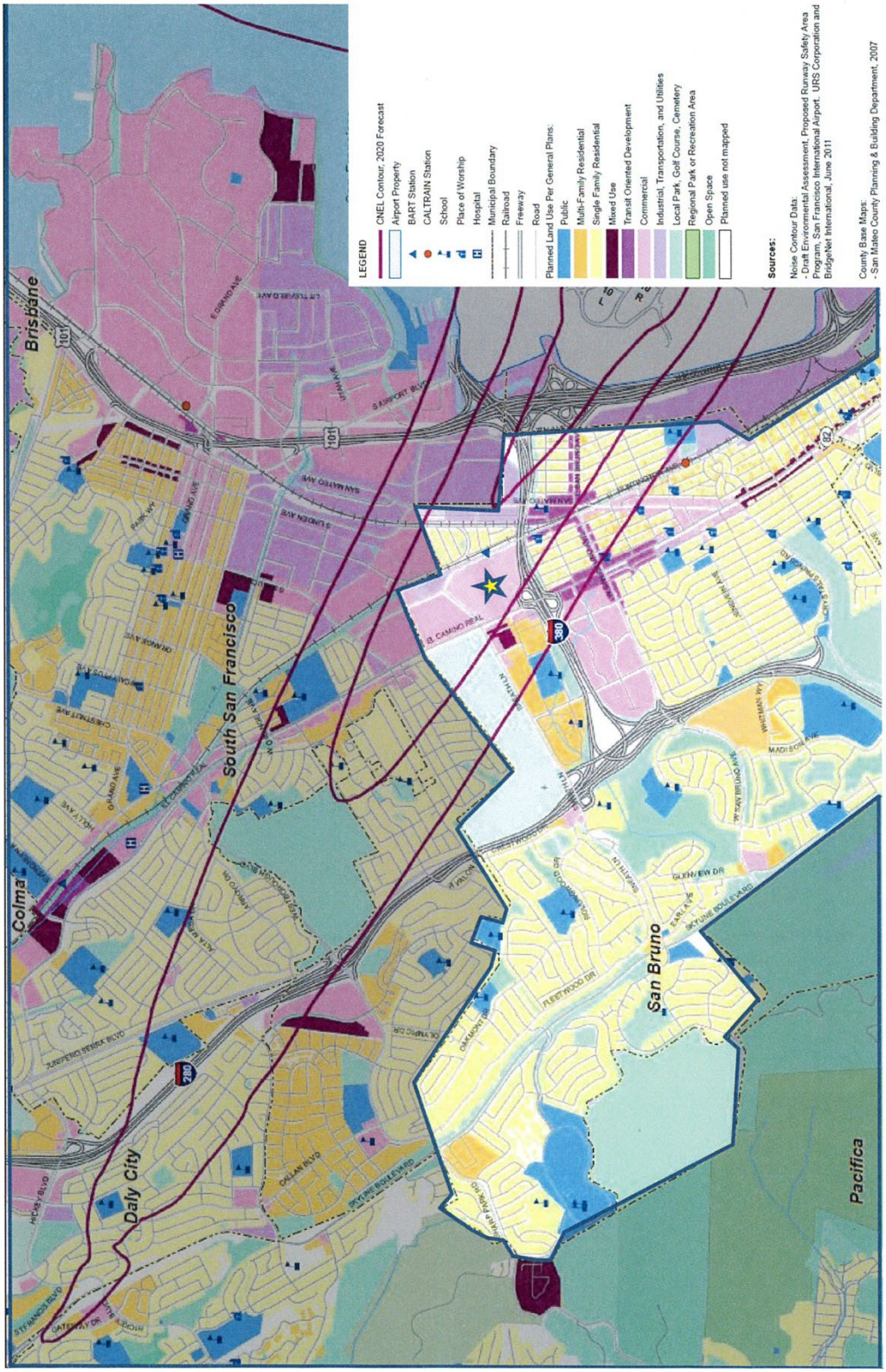

LEGEND
CNEL Contour, 2020 Forecast
Airport Property
BART Station
CALTRAIN Station
School
Place of Worship
Hospital
Municipal Boundary
Railroad
Freeway
Road
Planned Land Use Per General Plans:
Public
Multi-Family Residential
Single Family Residential
Mixed Use
Transit Oriented Development
Commercial
Industrial, Transportation, and Utilities
Local Park, Golf Course, Cemetery
Regional Park or Recreation Area
Open Space
Planned use not mapped
Sources:
Noise Contour Data:
- Draft Environmental Assessment, Proposed Runway Safety Area Program, San Francisco International Airport. URS Corporation and BridgeNet International, June 2011
County Base Maps:
- San Mateo County Planning & Building Department, 2007
Brisbane
South San Francisco
Colma
Daly City
San Bruno
Pacifica
101
280
380
82

Table IV-1 Noise/Land Use Compatibility Criteria

	COMMUNITY NOISE EQUIVALENT LEVEL (CNEL)			
LAND USE	**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.

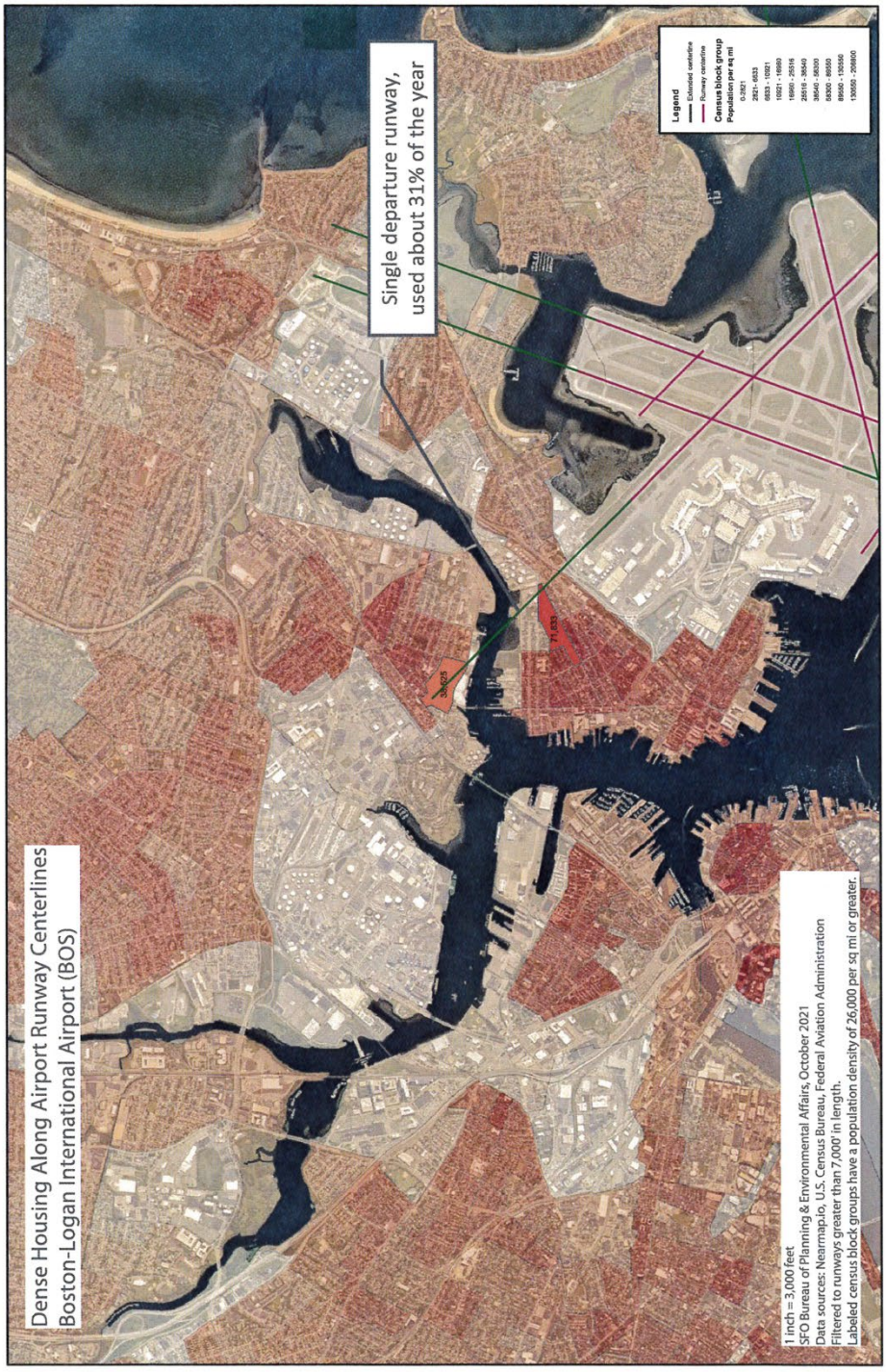
(c) Accessory dwelling units are not compatible.

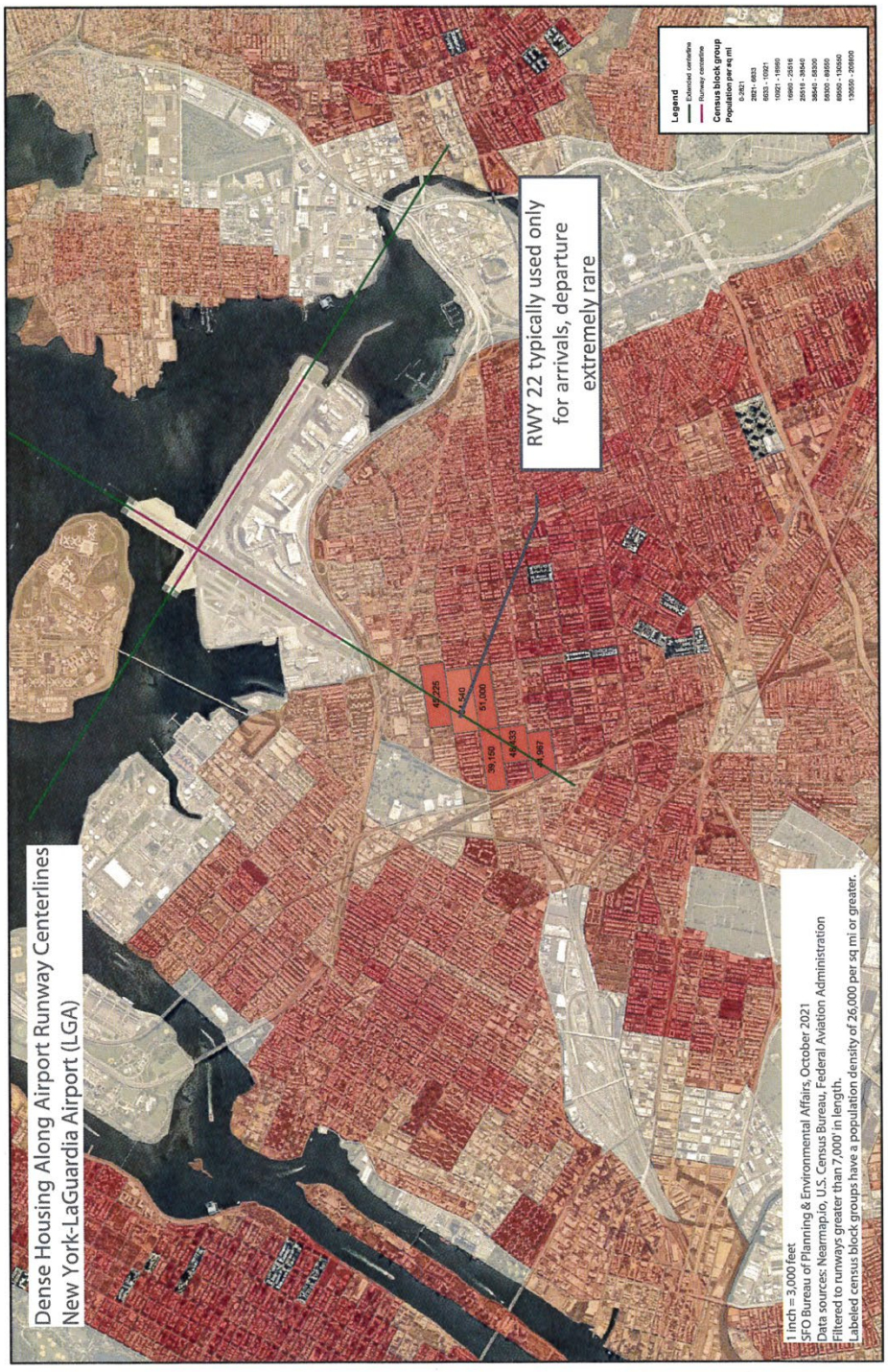
SOURCES: Jacobs Consultancy Team 2010. Based on State of California General Plan Guidelines for noise elements of general plans; California Code of Regulations, Title 21, Division 2.5, Chapter 6, Section 5006; and 14 CFR Part 150, Appendix A, Table 1.

PREPARED BY; Ricondo & Associates, Inc., June 2012.

ATTACHMENT B

Density of Housing Along Runway Centerlines
US Airports

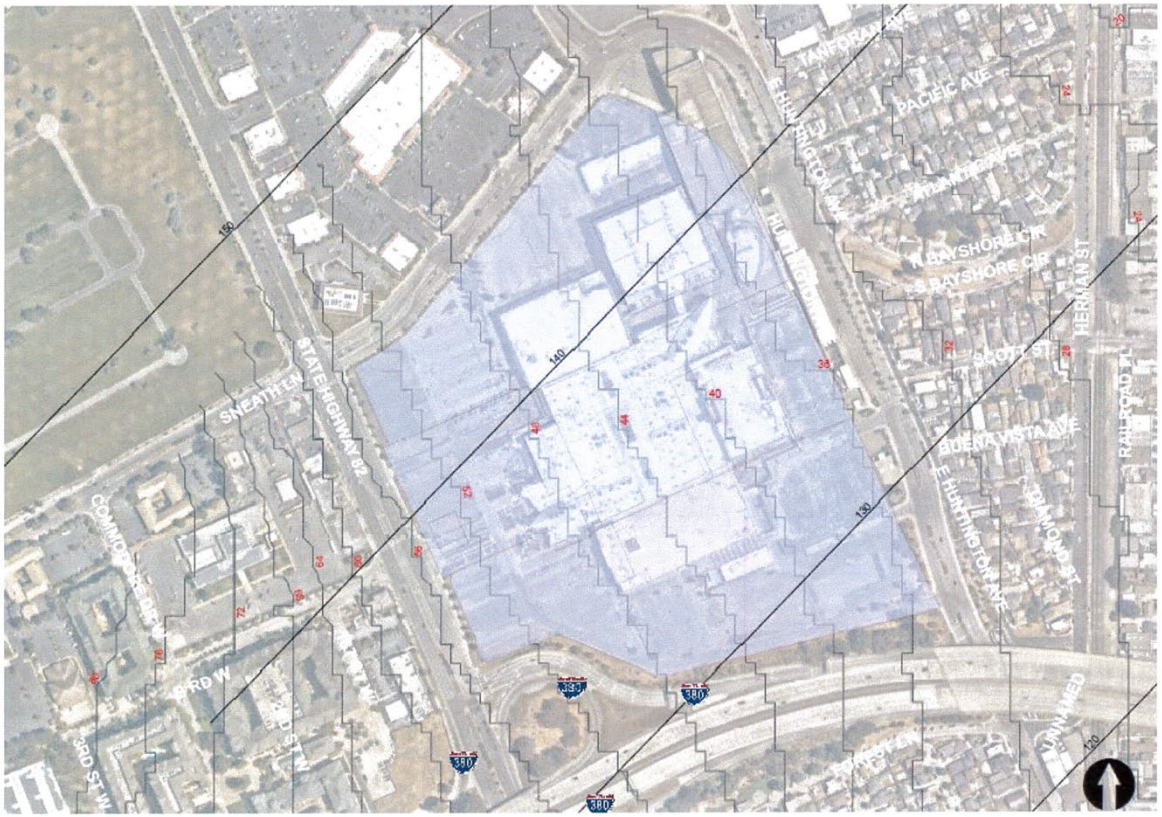

Dense Housing Along Airport Runway Centerlines
Boston-Logan International Airport (BOS)
Single departure runway, used about 31% of the year
Legend
Census block group
Population per sq mi
1 inch = 3,000 feet
SFO Bureau of Planning & Environmental Affairs, October 2021
Data sources: Nearmap.io, U.S. Census 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.
SFO


SFO
Dense Housing Along Airport Runway Centerlines
New York-LaGuardia Airport (LGA)
RWY 22 typically used only for arrivals, departure extremely rare
Legend
Extended centerline
Runway centerline
Census block group Population per sq mi
1 - 3670
3671 - 6553
6553 - 10021
10021 - 16950
16950 - 25516
25516 - 38540
38540 - 58300
58300 - 88550
88550 - 130550
130550 - 206800
49,225
47,540
51,000
99,168
49,453
47,947
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
0-2621
2621 - 6553
6553 - 10921
10921 - 16689
16689 - 25516
25516 - 38540
38540 - 58300
58300 - 89550
89550 - 130350
130350 - 208800
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.

ATTACHMENT C

SFO ALUCP Airspace Compatibility Policies



SOURCES: Nearmap.io; San Mateo County GIS; Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport, 2012; SFO Bureau of Planning and Environmental Affairs. August 2021.

NOTE 1: For discussion purposes only, not for design.
NOTE 2: Contour lines refer to feet AMSL relative to the origin of the North American Vertical Datum of 1988 (NAVD88). Ground elevations vary.

Critical Airspace Contours with Ground Elevations
Airport Land Use Compatibility Analysis
San Francisco International Airport

SFO

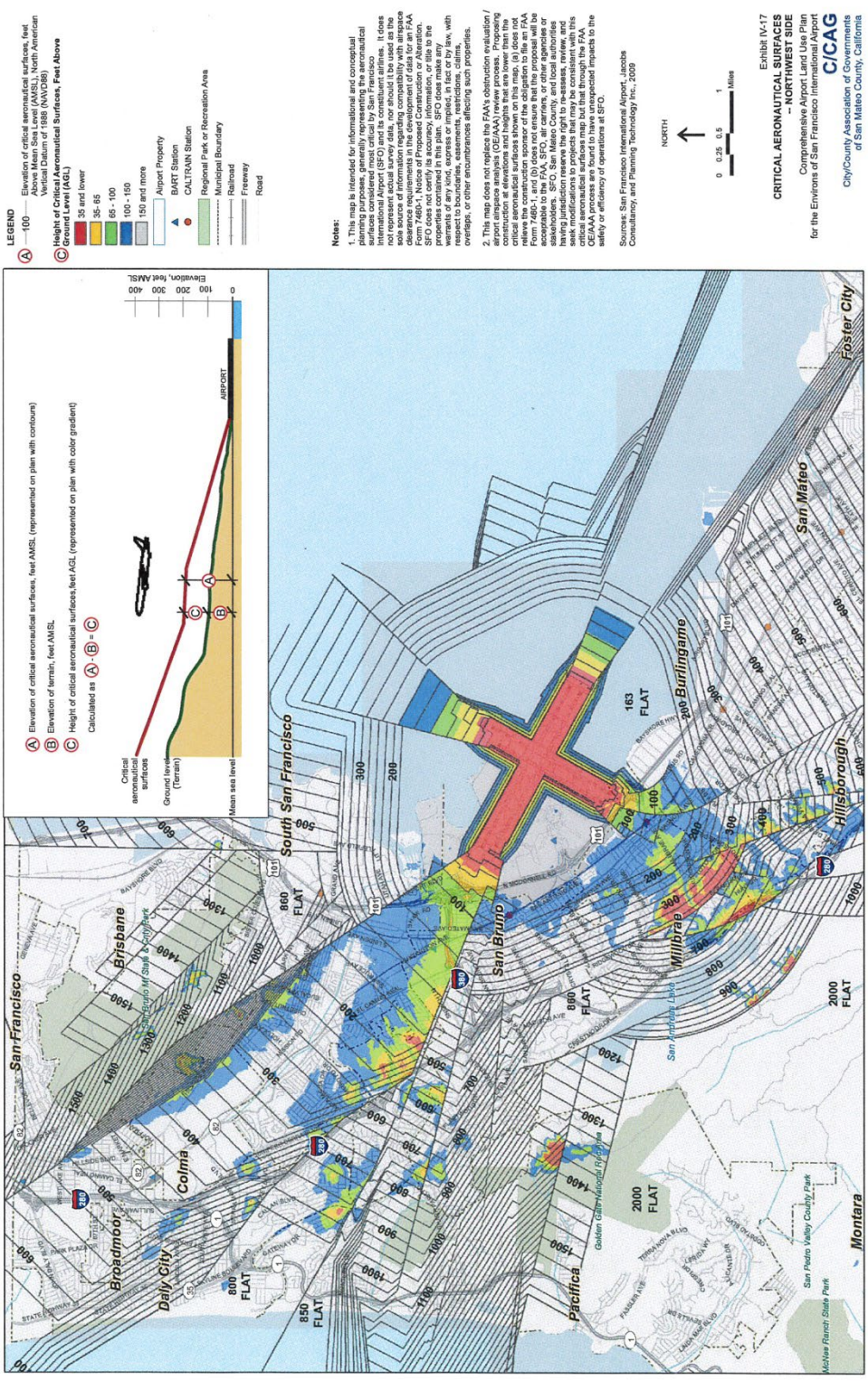

LEGEND
Elevation of critical aeronautical surfaces, feet Above Mean Sea Level (AMSL), North American Vertical Datum of 1988 (NAVD88)
Height of Critical Aeronautical Surfaces, Feet Above Ground Level (AGL)
35 and lower
35- 65
65 - 100
100 - 150
150 and more
Airport Property
BART Station
CALTRAIN Station
Regional Park or Recreation Area
Municipal Boundary
Railroad
Freeway
Road
Notes:
1. This map is intended for informational and conceptual planning purposes, generally representing the aeronautical surfaces constructed around San Francisco International Airport (SFO) and its constituent airports. It does not represent actual survey data, nor should it be used as the sole source of information regarding compatibility with airspace clearance criteria or the development of obstruction studies per 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 representations or warranties, express or implied, as to, 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 requirement to submit a notice to the 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 reassess, review, and issue modifications to or withdraw their findings on any of the 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
NORTH
0 0.25 0.5 1 Miles
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
A Elevation of critical aeronautical surfaces, feet AMSL (represented on plan with contours)
B Elevation of terrain, feet AMSL
C Height of critical aeronautical surfaces,feet AGL (represented on plan with color gradient)
Calculated as A - B = C
Critical aeronautical surfaces
Ground level (Terrain)
Mean sea level
AIRPORT
Elevation, feet AMSL
San Francisco
Brisbane
Broadmoor
Daly City
Colma
South San Francisco
San Bruno
Millbrae
Burlingame
San Mateo
Foster City
Hillsborough
Pacifica
Montara
163 FLAT
800 FLAT
850 FLAT
2000 FLAT
Golden Gate National Recreation Area
San Andreas Lake
San Pedro Valley County Park
McNee Ranch State Park

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-REV1-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.

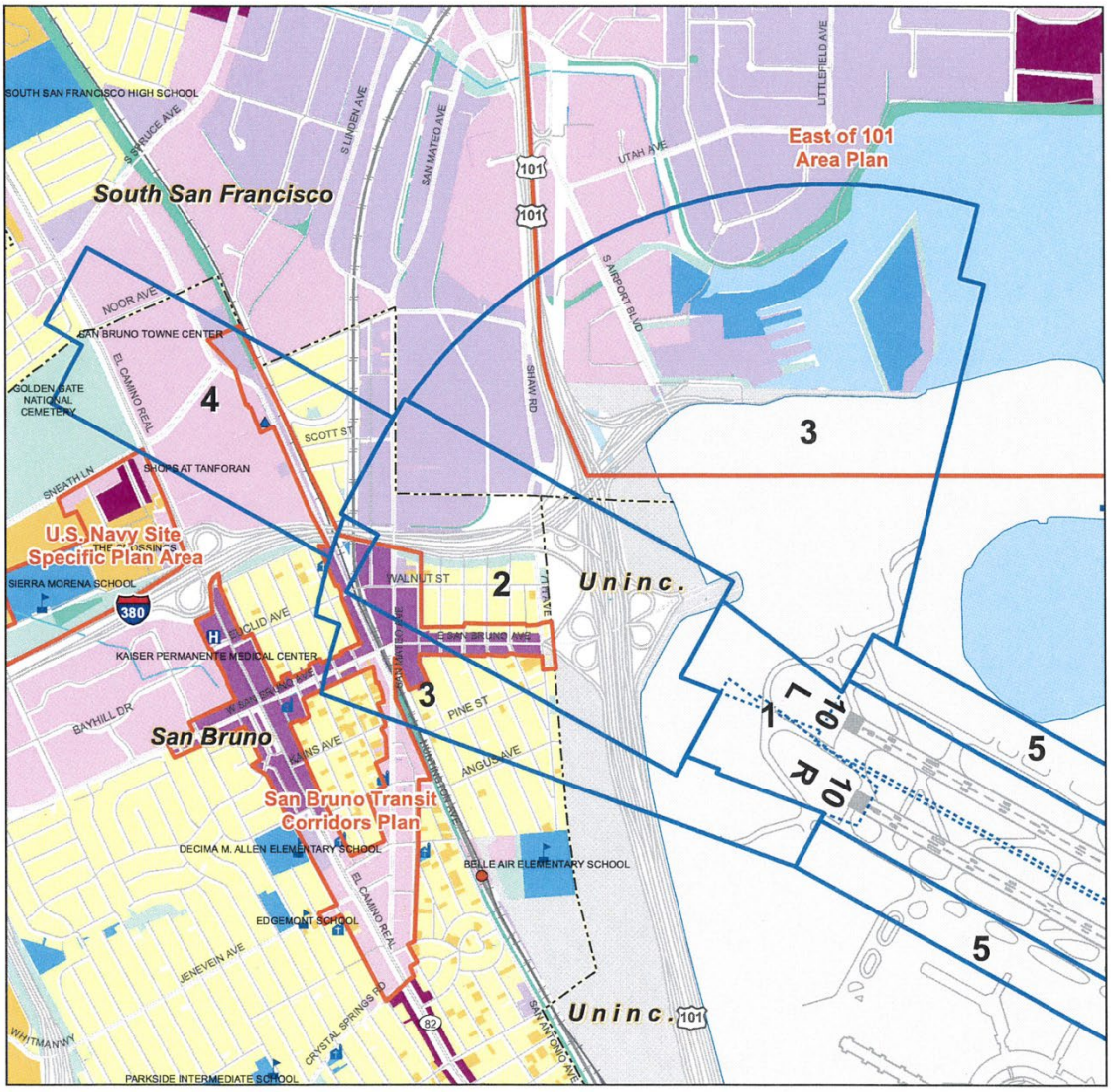
ATTACHMENT D

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 - Runway Protection Zone-Object Free Area
- 2 - Inner Approach/Departure Zone
- 3 - Inner Turning Zone
- 4 - Outer Approach/Departure Zone
- 5 - Sideline Zones
- Internal boundaries of ALP-defined areas
- Specific Plan Area
- Airport Property
- BART Station
- CALTRAIN Station
- School
- Place of Worship
- 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

NORTH

0 0.125 0.25 0.5 Miles

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/]	LAND USE CRITERIA: 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.

Housing Leadership Council Letter

HOUSING
LEADERSHIP
COUNCIL

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 Allocation[10]

	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 *either* present evidence demonstrating commitment from the property owner to build 1,000 homes *or* implement specific policies incentivizing housing on this site, especially affordable housing. These policies could include but are not limited to: - 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	- 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	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: - 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.	In order to raise reliable revenue, the city would benefit from internal revenue-raising proposals, such as: 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 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.
4-L	Promoting very low- and extremely	- Allow flexible inclusionary housing ordinance, with a lower proportion of BMR units if they are more deeply affordable

	low-income housing	- 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

Paul Wapensky Email

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

5th Cycle Housing Element Accomplishments

The most recent Housing Element cycle (fifth cycle) covers the 2015 to 2023 period. 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.

San Bruno issued building permits for 332 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 823 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 entitled 550 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 7-1 SAN BRUNO'S 5TH CYCLE RHNA

Income Level	RHNA	2015	2016	2017	2018	2019	2020	2021	2022	Total	Percentage	Remaining
Very Low	358	0	0	0	0	0	0	20	14	34	9.4%	324
Low	161	1	4	14	6	42	7	23	14	111	68.9%	50
Moderate	205	1	41	0	0	5	0	21	14	82	40.0%	123
Above Moderate	431	9	42	1	0	2	28	18	5	105	24.4%	326
Total Units	1,155	11	87	15	6	49	35	82	47	332	28.7%	823

Source: Association of Bay Area Governments

Projects totaling 550 units were entitled but not constructed in the planning period:

- **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. A few years after project entitlement the applicant abandoned the project and sold the property.
- **Mills Park Center (601-611 and 643-799 El Camino Real; 701-751 Camino Plaza; 711-777 Kains Avenue)** – Entitled for 427 multi-family residential units in a new 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.
- **Glenview Terrace** – Approved in July 2022 for a residential subdivision of 29 single-family homes. The property owner listed the property for sale shortly after entitlement. The property is under contract

to a new developer who has submitted a planning application for a residential townhome project with of 58 units.

1. 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.
- 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.

2. Accommodating Fifth Cycle Shortfall

The City's 5th Cycle RHNA Strategy used pipeline projects and units in adequately zones sites to meet 742 units of its RHNA obligation, leaving a shortfall of 510 units (310 very low, 110 low, and 90 moderate income). The City identified 65 parcels requiring rezoning within the transit corridors with a capacity for 958 units on 29.18 acres. The 5th Cycle Housing Element included a program to rezone sites within the Transit Corridors Specific Plan area (Program 2-A) to ensure consistency between the General Plan, the Housing Element, and the Zoning Ordinance.

	VL	L	Mod	AM	Total
RHNA	358	161	205	431	1155
5th cycle pipeline	4	2	47	67	120
5th Sites- No rezone	44	49	68	461	622
Total RHNA Met	48	51	115	528	742
Shortfall	310	110	90	(97)	510
Rezone Sites Commitment	290	136	171	361	958
Rezoned 2021					1,040

In 2021, the City updated its Zoning Ordinance in March 2021 to implement the Transit Corridors Plan, replacing commercial district zoning with the TOD zoning district. The City rezoned 62 parcels[48] covering 18.66 acres with a capacity for 1,040 units, covering the City's 5th Cycle shortfall.

To calculate the unit capacity in these zones the city used the following assumptions:

48 61 of the 62 parcels were included in the City's List of Rezone Sites used to satisfy the Fifth Cycle RHNA.

- CBD/TOD sites: These sites have no maximum density limit. The capacity of these sites was calculated using the realistic density assumptions for TOD sites in the Sixth Cycle Sites Inventory (100 du/ac).
- MX-R: The maximum allowable density in this zone is 40 du/ac. The City has received one application for a project in this zone that exceeded this density (60 du/ac) with a density bonus. The maximum allowable density was used.
- Others: Two sites were rezoned for a specified number of units as part of an entitlement. The number of units in the entitlement was used.

All the rezoned sites are at a density that is feasible to accommodate a range of housing types and affordability levels, including lower income units.

3. Cumulative Impacts in Addressing Special Needs

Government Code Section 65588 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 below, the 2015-2023 Housing Element included programs that addressed senior housing needs, emergency shelters, and needs for persons with disabilities. Some of the accomplishments include:

- The city rezoned the Skyline College property, now known as Skyline Ridge, and approved entitlements for 30 multi-family housing units, which included onsite 11 affordable housing units.
- The city approved an SB 35 application for 134 units housing, of which 24% will be affordable to lower income households.
- The city partnered with LifeMoves to find housing and services to help unsheltered individuals find housing and services.
- The city supported in HIP 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.
- The city approved Mills Park Center project with 64 affordable rental housing, including 45 units for lower income households.
- Utilization of small lot development regulations to facilitate affordable housing by design for small households.
- Promotion of home sharing services through the Senior Center.
- Approval of two reasonable accommodation requests.
- Amendment of the Zoning Code to allow child care facilities within all residential zones, resulting in two new child care centers in zones that previously did not permit such facilities. This amendment facilitates supportive services for families with children, particularly benefitting single-parent households.

However, the 5th cycle Housing Element lacks specific commitments to provide housing opportunities for special needs households, resulting in the overall lack of housing opportunities created for these populations. The 6th cycle Housing Element has been updated to include specific objectives and actions to benefit special needs groups. For example, Program 6 (Update Affordable Housing Program) includes an action to establish a minimum percentage of 20% of BMR units for special needs households.

4. Program Accomplishments

The California Department of Housing and Community Development requires that each housing element review the effectiveness of the previous 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 7).

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 supply. <u>Actions:</u> · Identify funding sources necessary for infrastructure improvements on a project-by-project basis. Funding sources may include gas tax, CDBG, etc. · Formulate 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.	**Program 1-A** *Implementation* · The City adopted development impact fees in 2019 to help fund infrastructure improvements. · The City made several pedestrian safety improvements along San Bruno Ave. and replaced water and sewer mains in the Avenues neighborhoods, benefitting the neighborhoods east of El Camino Real. · The water and sewer mains along San Mateo Ave. were replaced. **Has the program been successful?** Yes, but infrastructure upgrades should be more targeted, if possible, to benefit the development anticipated in the sites inventory which are mostly located in the TCP 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. <u>Actions:</u> · 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.	**Program 1-B:** *Implementation* · The City approved two residential subdivision projects which utilized small lot development with 30% reduced lot sizes and reduced setbacks, allowing projects to maximize General Plan density. Forty housing units were approved at Skyline Ridge and 29 housing units were approved at Glenview Terrace. **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 legalize excess housekeeping units in R-1 and R-2 zones that were constructed prior to June 30, 1977 and that met the California Building Code at time of construction. <u>Actions</u>: · Continue to provide informational handouts to inform residents how to legalize second units in R-1 and R-2 zones at the Planning Department and the Public Library. · Create a program to legalize second units constructed between 1977 and 2003, including alleviated existing barriers such as parking standards.	**Program 1-C** *Implementation* · The City adopted development impact fees in 2019 to help fund infrastructure improvements. · The City made several pedestrian safety improvements along San Bruno Ave. and replaced water and sewer mains in the Avenues neighborhoods. Benefitting the neighborhoods east of El Camino Real. · 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, leaving developers to do additional infrastructure upgrades.

<table>
<tr><th colspan="2">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))</th></tr>
<tr><td>• Update application materials for excess housekeeping units to improve clarity.
• Aim to facilitate construction and/or legalization of second units at a rate of 4 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 assumed to qualify for the very-low income category.</td><td>Has the program been successful? Yes, but infrastructure upgrades should be more targeted, if possible, to benefit the development anticipated in the sites inventory which are mostly located in the TCP specific plan area. This program will be continued but modified to address this shortcoming.</td></tr>
<tr><td>Program 1-D: Pursue and promote resources for preservation and rehabilitation.

Publicize 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 supply.

<u>Actions:</u>
• 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 whom 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 In-Lieu Fee Fund.</td><td>Program 1-D

Implementation
• Due to lack of resources, the city did not implement this program.</td></tr>
<tr><td colspan="2">Program 1-D

Has the program been successful? This program was not implemented but a version of it has been added to the 2023-2031 programs, see program 4-E.</td></tr>
<tr><td>Program 1-E: Ensure replacement housing.

Develop a comprehensive program to replace housing throughout the City to accommodate all income levels.

<u>Actions:</u>
• Amend the Zoning Ordinance to require replacement of demolished legal housing units in all areas of the city.
• Require replacement equal to or more than the number of legal units previously on the site.</td><td>Program 1-E

Implementation
• Though the city did not amend the Zoning Ordinance it did not approve any projects proposing the removal of housing that was not replaced.</td></tr>
</table>

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<tr><th colspan="2">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))</th></tr>
<tr><td colspan="2">Program 1-E

Has the program been successful? This program was not implemented but will be retained and updated for the 2023-2031 programs, see program 4-G. The city will update its ordinance to require replacement of housing that is lost through demolition.</td></tr>
<tr><td>Program 1-F: Improve legally non-conforming residential uses.

Work to facilitate improvement and expansion of existing legal non-conforming residential uses if compatible with adjacent uses.

<u>Actions:</u>
· 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 Update.
· Create an informational handout and provide public outreach to property owners with structures that may fall into this category.</td><td>Program 1-F

Implementation
· This program was not completed due to lack of resources.</td></tr>
<tr><td colspan="2">Program 1-F

Has the program been successful? N/A</td></tr>
<tr><td>Program 1-G: Support historic preservation.

Support preservation and reuse of properties with historic character.

<u>Actions:</u>
· Preserve historic structures and resources during reuse and intensification within the city’s
· older neighborhoods. (General Plan Policy ERC-44)
· 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 ERC-36)
· 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 2001 Historical 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.</td><td>Program 1-G

Implementation
· The city did not receive any historic preservation projects during the 2015-2023 planning cycle, which indicates there isn’t much of a need for this type of work. The city requires a historic resource evaluation for major alteration and demolition of properties that are 50 years old or more.</td></tr>
<tr><td colspan="2">Program 1-G

Has the program been successful? This program was not successful and will be removed.</td></tr>
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<table>
<tr><th colspan="2">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))</th></tr>
<tr><td>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.

<u>Actions:</u>
· 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 any project, including affordable projects.</td><td>Program 1-H

Implementation
· The city did not receive any projects that proposed housing rehabilitation using Community Development Block Grant (CDBG) program funds or through other San Mateo County programs or through non-profit agencies.</td></tr>
<tr><td colspan="2">Program 1-H

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 only implement those fee waivers and deferrals required per state law.</td></tr>
<tr><td>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.

<u>Actions:</u>
· Display and distribute informational handout 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.</td><td>Program 1-I

Implementation
· The City will continue to provide lead-based paint abatement information on its website.</td></tr>
<tr><td colspan="2">Program 1-I

Has the program been successful? This program will be removed because it has been completed</td></tr>
<tr><td>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-E regarding new housing development.)

<u>Actions:</u>
· 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 all standards set forth in the Residential Design Guidelines.
· Prepare informational handouts on the Residential Design Guidelines.
· Amend Guidelines as necessary to ensure</td><td>Program 1-J

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.</td></tr>
</table>

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))	
they clearly reflect neighborhood character goals.	

Program 1-J

Has the program been successful? The successfully applies its Residential Design Guidelines to all residential projects in low-density residential districts. Objective design guidelines are needed for multi-family residential projects. A 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. Revise the Zoning Ordinance to reflect the San Bruno 2025 General Plan and Transit Corridors Plan (2013), including land use designations allowing mixed-use development. Actions: • Update the Zoning Ordinance to create Mixed Use and Multi Use–Residential Focus 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 Crystal Springs Road, thus reinforcing the existing retail activity in Downtown. • Allow residential uses by right without a conditional use permit, planned development permit or other discretionary action in Mixed-Use and Multi-Use Residential Focus zoning districts, consistent with Section 65583.2(h) & (i). • Update the Zoning Map to match the designations indicated in General Plan and TCP. • In the interim before the Zoning Ordinance is updated, encourage and facilitate approval of projects that adhere to the General Plan and TCP land uses and densities/intensities. • Ensure that Zoning Ordinance amendment to rezone sites from nonresidential use to residential use is in accordance with Section 65583.2 of the California Government Code as amended by Assembly Bills No. 1690 and 1537. • Treat agriculture-related employee housing providing accommodation for six or fewer employees the same as any single-family structure within all residential zoning districts, in accordance with Health and Safety Code Section 17021.5.	**Program 2-A** *Implementation:* • The City updated its Zoning Ordinance in March 2021 to implement the Transit Corridors Plan, replacing commercial district zoning with the TOD zoning district and making it possible to construct the 1,610 housing units envisioned in the TCP. Using realistic densities (based on recent trends), at least 1,040 units can be accommodated on the rezoned sites. • Since the update, the city has experienced an increase in development applications for multi-family residential projects within the plan area. • Although the rezoning permits housing, projects are still required to obtain an Architectural Review Permit, which is a discretionary process. • Several housing projects were entitled within the TCP during the rezoning delay but the entitlements took much longer than if the zoning had already been in place.
Program 2-A **Has the program been successful?** Including all applications, the city has entitled 715 housing units within the TCP. 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, of increasing residential options in Downtown and transit corridors in the vicinity of the San Bruno Avenue Caltrain Station completed in 2014. Actions: • Promote new or different housing products or arrangements (e.g., shared housing, cube housing, co-housing, etc.) that better meet current housing needs in the TCP 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 TCP, including infrastructure upgrades to accommodate new	**Program 2-B** *Implementation:* • The city adopted the Transit Corridors Plan in 2014 and is now several years into the implementation phase of the plan. However, the zoning was only updated in 2021.

<table>
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<tr><td>residential development.
• Develop a program to accomplish implementation actions in the adopted Transit Corridors Plan with the goal, amongst others, of increasing residential options in Downtown and transit corridors in the vicinity of the San Bruno Avenue Caltrain Station.
• Provide information materials on the TCP development standards and design guidelines on the City website and handout materials.</td><td></td></tr>
<tr><td colspan="2">Program 2-B

Has the program been successful? In the early years after plan adoption, the TCP was not that successful because the zoning had not yet been updated. In 2021, the city updated the zoning to fully implement the plan and there has been a lot of development interest since. This program will not be retained because TCP implementation would benefit most from objective design standards.</td></tr>
<tr><td>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.

<u>Actions:</u>
• Actively engage the community about options to redevelop the proposed housing opportunity sites listed in Table 4.4-1 and shown in Figure 4.4-1.
• Prioritize review of development proposals and permitting procedures for identified housing opportunity sites.</td><td>Program 2-C

Implementation:
• After plan adoption, the city met with regional developers to champion the TCP development opportunities and facilitate coordination among property owners. However, sites that required several lot to be consolidated proved difficult to achieve.</td></tr>
<tr><td colspan="2">Program 2-C

Has the program been successful? The TCP 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 inventory properties, see program 2-K.</td></tr>
<tr><td>Program 2-D: Reuse former school sites.

Facilitate the reuse of former school sites to accommodate affordable housing.

<u>Actions:</u>
• 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:
o Willard Engvall School site
o Crestmoor High School site
o 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 playgrounds according to General Plan Policy OSR-8 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 may</td><td>Program 2-D

Implementation:
• The city is in the process of working with applicants to develop the Willard Engvall and Crestmoor High School sites.
• Preliminary plans indicate development on the sites will be clustered, with small lots similar to other more recent residential subdivision projects.</td></tr>
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<tr><td>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.</td><td></td></tr>
<tr><td colspan="2">Program 2-D

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.</td></tr>
<tr><td>Program 2-E: Consolidate Lots.

Use City funds to facilitate lot consolidation in support of the redevelopment of housing opportunity sites with affordable housing.

<u>Actions:</u>
• Starting with the Housing Opportunity 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 Plan and Transit Corridors Plan density and intensity standards (General Plan Table 2-1) which allow mixed use development density/intensity to increase with the size of the development site.</td><td>Program 2-E

Implementation:
• The city worked with the developers of Mills Park and 111 San Bruno Ave. 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 Plan and Transit Corridors Plan, allowing unlimited FAR for lots 20,000 square feet or more.</td></tr>
<tr><td colspan="2">Program 2-E

Has the program been successful? Lot consolidation is an important mechanism for ensuring housing opportunity sites in the inventory can achieve unlimited housing density. Therefore, this program will be retained and incorporated into program 2-B.</td></tr>
<tr><td>Program 2-F: Ensure compatibility of new housing with neighborhood character.

Use Residential Design Guidelines and Transit Corridors Plan Design Guidelines to ensure that new housing development proposals are compatible with existing neighborhood character. (See Program 1-J regarding additions and renovations to existing homes.)

<u>Actions:</u>
• Use the new Transit Corridors Plan Design Guidelines to ensure that new housing development proposals are compatible with existing neighborhood character. Require applications for new multi-family residential and mixed-use development in the TCP area to comply with the design guidelines, development standards, and Mixed Use to Residential Transition Measures set forth in the TCP.
• 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 multi-family residential and mixed-use development in Transit Corridors Plan area to comply with the design guidelines, development standards, and Mixed Use to Residential Transition Measures set forth</td><td>Program 2-F

Implementation:
• The city applies the Residential Design Guidelines and Transit Corridors Plan Design Guidelines to all projects within these districts to ensure neighborhood compatibility.
• Prior to application submittal, the city encourages dialogue to ensure submittals are reflect staff guidance regarding the guidelines.</td></tr>
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<tr><td>in the Transit Corridors Plan.
• Develop design standards during the Zoning Ordinance update for new multi-family residential projects in R-3, R-4, and new General Plan multi-use residential focus 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 Plan Design Guidelines to increase applicant certainty, and periodically evaluate the implementation of the guidelines to ensure they do not unduly constrain residential development.</td><td></td></tr>
<tr><td colspan="2">Program 2-F

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.</td></tr>
<tr><td>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.

<u>Actions:</u>
• Encourage the development of small rental and for-sale units close to transit and services, especially in the Transit Corridors Plan area, which would appeal and be affordable to seniors on fixed incomes.
• Encourage developers to market “senior” units mixed with family units.
• Work with the Senior Center, AARP, and others to educate seniors about affordable housing options as they become available.</td><td>Program 2-G

Implementation:
• The City advertises home sharing opportunities through the Senior Center and encourages developers to include housing units of varying sizes but it is unclear to what extent these efforts have assisted senior residents.</td></tr>
<tr><td colspan="2">Program 2-G

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.</td></tr>
<tr><td>Program 2-H: Encourage moderate-income for-sale housing.

Encourage moderate-income for-sale housing within the Multi Use-Residential Focus area along El Camino Real.

<u>Actions:</u>
• Notify the development community about the City’s desire for more moderately-priced for- sale housing along the transit corridors, potentially in the form of multi-family 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 3-I.</td><td>Program 2-H

Implementation:
• In 2021, the city approved 271 El Camino Real, within the MX-R District, a proposal for 23 multi-family units, eight of which would be larger for-sale units.
• During pre-submittal discussions with applicants, the city references the density bonus ordinance, and as a result has four projects under review that are proposing to exercise density bonus provisions.</td></tr>
<tr><td colspan="2">Program 2-H</td></tr>
</table>

<table>
<tr><th colspan="2">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))</th></tr>
<tr><td colspan="2">Has the program been successful? Moderate-income households find it less difficult to find suitable 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.</td></tr>
<tr><td>Program 2-I: Provide affordable housing education.

Develop and implement an ongoing voter education program to inform residents of the need for affordable housing and ways the electorate can support its development.

<u>Actions:</u>
· Develop a voter education program addressing provision of affordable housing. Potential media to be used include newspaper articles, bulletins and informational handouts, cable television, community workshops, the Focus newsletter, 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.</td><td>Program 2-I

Implementation:
· This program was not completed due to lack of resources.</td></tr>
<tr><td colspan="2">Program 2-I

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.</td></tr>
<tr><td>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.

<u>Actions:</u>
· 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, they will be notified of Planning Commission and Staff recommendations prior to taking action.</td><td>Program 2-J

Implementation:
· The city updated its zoning code in 2021 to fully incorporate the TCP's development standards and establish the TOD zoning district.</td></tr>
<tr><td colspan="2">Program 2-J

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.</td></tr>
</table>

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. Actions: • Study 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, flyers in utility billings, 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-lieu 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-J.	**Program 3-A** *Implementation* • Due to lack of resources, the city did not implement this program to the extent needed.
Program 3-A **Has the program been successful?** This program will be retained, see program 2-F.	
Program 3-B: Support the Housing Choices Voucher Program. Continue to participate in San Mateo County Housing Authority's Housing Choices Voucher program (formerly Section 8). Actions: • Encourage new housing developers to participate in the Housing Choices Voucher program during preparation of future development agreements/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.	**Program 3-B** *Implementation:* • Due to lack of resources, it is unclear how successful this program has been in San Bruno. Given the high market rents and limited funding from HUD, Housing Choice Vouchers (HCVs) have not been effective. However, the City will educate the public regarding the State's source of income protection to ensure landlords are aware of that HCVs are protected under source of income.
Program 3-B **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 3-C** *Implementation:*

<table>
<tr><th colspan="2">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))</th></tr>
<tr><td>Program 5-E)

<u>Actions:</u>
· 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 Avalon Bay at The Crossing, which includes 97 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 apartments include 228 affordable units with affordable housing covenants.</td><td>· 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.</td></tr>
<tr><td colspan="2">Program 3-C

Has the program been successful? This program will be retained and incorporated into program 3-H.</td></tr>
<tr><td>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.

<u>Actions:</u>
· 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 Alliance (a non-profit organization) in English and Spanish.</td><td>Program 3-D

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, and resources are extremely limited and on a first-come-first-serve countywide basis.</td></tr>
<tr><td colspan="2">Program 3-D

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-F.</td></tr>
<tr><td>Program 3-E: Facilitate reasonable accommodations.

Facilitate the development, maintenance and improvement of housing for persons with disabilities by implementing Reasonable Accommodations program.

<u>Actions:</u>
· 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 minimal or no processing fee, subject to approval by the Community Development Director, or his/her designee, who would apply the following decision-making criteria:
· The request for reasonable accommodation will be used by an individual with a Disability protected under fair housing laws.</td><td>Program 3-E

Implementation:
· The city updated its reasonable accommodation ordinance in 2021 in response to changes in state law.
· The city approved two reasonable accommodate requests during the planning period.</td></tr>
</table>

<table>
<tr><th colspan="2">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))</th></tr>
<tr><td>

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 inform service providers about the City’s adopted Reasonable Accommodation Program.

</td><td></td></tr>
<tr><td colspan="2">Program 3-E

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, see program 4-D.</td></tr>
<tr><td>Program 3-F: Accommodate manufactured housing. Continue to permit manufactured housing in single family zones.

<u>Actions:</u>
Permit manufactured housing on permanent foundation systems in all 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 65852.3.
Require applications for new manufactured housing to comply with standards set forth in the new Residential Design Guidelines.
Ensure that no special restrictions on manufactured housing are included in the Zoning Ordinance Update or the Residential Design Guidelines beyond those that apply to regular single family construction.</td><td>Program 3-F

Implementation:
The city permits manufactured housing which is subject to the same design standards as conventionally built housing.
The city did not receive a request during the planning period to permit a manufactured home within a single-family district.</td></tr>
<tr><td colspan="2">Program 3-F

Has the program been successful? This program will not be retained because the city does apply the same standards to manufactured housing and conventional housing.</td></tr>
<tr><td>Program 3-G: Permit childcare by right in residential zoning districts.

Ensure that land use regulations consistently allow childcare services by right in all residential zones in accordance with State law.

<u>Actions:</u>
In accordance with San Bruno 2025 General Plan Policy LUD-10 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.</td><td>Program 3-G

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.</td></tr>
<tr><td colspan="2">Program 3-G

Has the program been successful? This program will be removed because it has been completed.</td></tr>
<tr><td>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</td><td>Program 3-H

Implementation:
The city updated its parking requirements in</td></tr>
</table>

<table>
<tr><th colspan="2">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))</th></tr>
<tr><td>as within the Medium Density (R-3) and High Density (R-4) zones.

<u>Actions:</u>
· Consider ways to reduce parking standards for housing near transit and units with residents with reduced automobile use, such as seniors and persons with disabilities, and clarify and implement reduced parking requirements in the Zoning Ordinance Update.
· Update parking standards pursuant recommendations of the Transit Corridors Plan.
· Update parking standards pursuant to Government Code 65915(p) affordable housing density bonus requirements.
· Consider allowing—but not mandating—“unbundled” parking as part of residential
· developments (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 by right as suggested by State law (Government Code Section 65852.2(e)). Currently 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-3 and R-4 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.</td><td>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 removed the parking requirement for ADUs proximate to transit and created a process to address parking impacted neighborhoods.</td></tr>
<tr><td colspan="2">Program 3-H

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 park their projects. This program will not be retained because it was completed with the update to city’s parking standards in 2020.</td></tr>
<tr><td>Program 3-I: Support condominium conversions, cooperatives, and other affordable housing ownership options.

Facilitate condominium conversions, limited equity stock cooperatives, and community apartments to ensure affordable ownership choices within the housing supply.

<u>Actions:</u>
· Evaluate each condominium, stock cooperative, and community apartment project on its own merits.
· Consistent with the municipal code, continue to ensure residents of existing apartments have the first opportunity to buy their unit in the instance of condominium conversion.
· Coordinate with the California Association of Housing Cooperatives (CAHC), a nonprofit organization, about how to market and support cooperatives in San Bruno.
· Consider making condominium conversions subject to the City’s existing Below Market Rate Housing Program, which</td><td>Program 3-I

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.</td></tr>
</table>

<table>
<tr><th colspan="2">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))</th></tr>
<tr><td>provides for 15 percent of new for-sale units to be affordable to low- and moderate-income households.</td><td></td></tr>
<tr><td colspan="2">Program 3-I

Has the program been successful? This program will not be retained because the condominium conversion requirements have been sufficiently updated.</td></tr>
<tr><td>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 permissible and reasonable fee level for both residential and commercial development.

<u>Actions:</u>
· 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 permissible and reasonable impact fee level for both residential and commercial development based on local conditions that will not discourage development.</td><td>Program 3-J

Implementation:
· In 2019, 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 2015, the city participated in a multi-city nexus study through 21 Elements, which led to the adoption of a new affordable housing ordinance to impose affordable housing impact fees in 2016.</td></tr>
<tr><td colspan="2">Program 3-J

Has the program been successful? This program has been successful, as the city has collected over $14M in affordable housing impact fees. However, the program will not be retained since it has already been implemented.</td></tr>
</table>

<table>
<tr><th colspan="2">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))</th></tr>
<tr><td>Program 4-A: Promote energy conservation.

Continue to publicize and encourage energy conservation programs, including weatherization programs.

<u>Actions:</u>
· Maintain an updated list of residential energy conservation opportunities, programs, and funding resources. Include information about programs available through PG&E, 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 intermittently in utility billings.
· Study new opportunities for providing rebates or incentives for homeowners' investments in
· energy-saving techniques (upgrading thermostats, insulation, windows, etc.)
· Consider structuring incentives as tax credits or improvements funded through voluntary long- term assessment on property tax bills.
· Promote the California HERO Program in San Bruno, endorsed by the City Council on October 14, 2014 (Resolution No. 2014-107), to provide for the financing of renewable energy distributed generation sources, energy and water efficiency improvements and electric vehicle charging infrastructure property owners in financing the cost of installing Improvements.</td><td>Program 4-A

Implementation
· The city provides information about energy conservation from handouts through the Building division and information on the department's website. Program partially implemented.</td></tr>
<tr><td colspan="2">Program 4-A

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.</td></tr>
<tr><td>Program 4-B: Support household and business participation in energy conservation and efficiency programs through PG&E and the State.

City Staff will work to promote and support participation 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 supply.

<u>Actions:</u>
· Promote programs through informational brochures made available where all residential building standards guidelines can be found.
· Provide links to the programs through the City website.
· Work with CHPC to identify households eligible for programs.</td><td>Program 4-B

Implementation:
· The city provides information about energy conservation from handouts through the Building division and information on the department's website. Program partially implemented.</td></tr>
<tr><td colspan="2">Program 4-B

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.</td></tr>
</table>

<table>
<tr><th colspan="2">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))</th></tr>
<tr><td>Program 4-C: Facilitate noise insulation retrofits.

Continue to pursue funding for noise insulation from the San Francisco International Airport and educate residents about program benefits.

<u>Actions:</u>
· Continue to seek funds through the Federal Aviation Administration’s Aircraft Noise Insulation
· Program.
· Facilitate the upgrading of 154 existing homes in San Bruno that still qualify for aircraft noise insulation retrofits.
· 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.
· Encourage adoption of noise insulation standards by San Francisco International Airport to mitigate impacts from airplane back blast, and expand the CNEL threshold level for insulation from 65 CNEL to 60 CNEL.</td><td>Program 4-C

Implementation:
· The city continued its partnership with the San Francisco International Airport to administer the window insultation retrofit program. In total, 90 homes were utilized the program during the planning period.</td></tr>
<tr><td colspan="2">Program 4-C

Has the program been successful? This program has been successful and will be retained as it primarily impacts the neighborhoods west of El Camino Real. See program 4-T.</td></tr>
<tr><td>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, affordable housing receives priority for these services, and new development uses best management practices to reduce water waste.

<u>Actions:</u>
· 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 developments are granted priority for service allocations.
· In accordance with General Plan policies ERC-19 through ERC-24 and PFS-19, work with developers and residents on an on-going basis to minimize the surface water run-off and pollution, increase water conservation during construction and operation phases of new residential development, and make recycled water available for appropriate uses.</td><td>Program 4-D

Implementation:
· The city provided a copy of the adopted Housing Element to the SFPUC after its adoption to ensure the continuation of water service.</td></tr>
<tr><td colspan="2">Program 4-D

Has the program been successful? This program will not be retained because state law now mandates this coordination through Housing Element law.</td></tr>
</table>

<table>
<tr><th colspan="2">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))</th></tr>
<tr><td>Program 4-E: Encourage drought-resistant landscaping.

Implement water conservation and drought-resistant landscaping guidelines and standards.

<u>Actions:</u>
· 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 10.16, 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.</td><td>Program 4-E

Implementation:
· The city requires MWELO compliance for all projects that meet the threshold.</td></tr>
<tr><td colspan="2">Program 4-E

Has the program been successful? The city will continue to encourage drought-resistant landscaping, but this program will not be retained because it is mostly superseded by MWELO requirements.</td></tr>
</table>

<table>
<tr><th colspan="2">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))</th></tr>
<tr><td>Program 5-A: Support the Below Market Rate Housing Ordinance.

Through education and enforcement of the Below Market Rate Housing Ordinance (adopted 2008), provide guidelines for developers to comply with the City's inclusionary housing requirements.

<u>Actions:</u>
· In accordance with the BMR Ordinance, require new residential developments with 10 or more housing units to provide a minimum of 15 percent of total housing units affordable to very-low, low-, and moderate-income households through construction, donation of land, and/or payment of in-lieu fees.
· In accordance with the BMR Ordinance, require maintenance of subsidized housing units as affordable to very-low, low-, and moderate-income households for a period of at least 55 years from date of occupancy for rental units and 45 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.</td><td>Program 5-A

Implementation
· The city's affordable housing ordinance was revised in 2016 to apply to rental projects. The program was revised gain in 2021 to codify its preference for onsite affordable units and change the affordability mix.</td></tr>
<tr><td colspan="2">Program 5-A

Has the program been successful? Through this program, the city was successful in entitling more than 90 deed restricted affordable housing units during the planning period. The program will be retained and revised, see program 3-C.</td></tr>
<tr><td>Program 5-B: Implement San Bruno's density bonus regulations.

Offer a density bonus of up to 35 percent and incentives or concessions based on the number of affordable units in the development and a flat density bonus of 20 percent for all senior housing in accordance with State density bonus regulations (Government Code 65915).

<u>Actions:</u>
· Continue to meet State requirements (California Government Code 65915) for provision of density bonuses.
· Promote density bonus opportunities to property owners and developers at the earliest stages in pre-development review and consultation process.
· Ensure that State density bonus parking standards are allowed in qualifying density bonus projects. (See also Program 3-I)</td><td>Program 5-B

Implementation:
· The city updated its density bonus ordinance in 2021, as a result, it approved two density bonus projects: 732-740 El Camino Real, and 840 San Bruno Ave.) and is currently reviewing two other density bonus projects (170 San Bruno Ave., 111 San Bruno Ave.) Combined, these projects will produce 644 dwelling units.</td></tr>
<tr><td colspan="2">Program 5-B

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 2021. This program will be retained and revised to ensure continued compliance with state law, see program 1-I.</td></tr>
</table>

<table>
<tr><th colspan="2">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))</th></tr>
<tr><td>Program 5-C: Provide financial incentives for affordable condominium conversions.

Create incentives for condominium conversions that provide affordable housing.

<u>Actions:</u>
· Revise 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 very-low 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 3-J).</td><td>Program 5-C

Implementation:
· Program not implemented due to lack of resources.</td></tr>
<tr><td colspan="2">Program 5-C

Has the program been successful? This program will not be retained because the city did not receive any interest in condominium conversions during the planning cycle.</td></tr>
<tr><td>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.

<u>Actions:</u>
· Provide financial assistance where necessary and appropriate to facilitate affordable housing development, based on diligent analysis of a project's financial feasibility and desirability.
· Prepare an Owner Participation Agreement to ensure that proposed financing resources are dedicated to the construction, rehabilitation, or rental costs of affordable housing projects.
· Study the incorporation of monitoring compliance with Owner Participation Agreements within the regular project permitting and approval processes.</td><td>Program 5-D

Implementation:
· Program not implemented due to lack of resources.</td></tr>
<tr><td colspan="2">Program 5-D

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, see program 3-B.</td></tr>
</table>

<table>
<tr><th colspan="2">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))</th></tr>
<tr><td>Program 5-E: Increase the supply of housing for large families.

Encourage diversity in unit size to ensure that 3- and 4-bedroom affordable rental housing units are provided for large families.

<u>Actions:</u>
· Negotiate development of large (3- and 4-bedroom) units in future development agreements.
· Exclude senior housing developments from this expectation.</td><td>Program 5-E

Implementation:
· The city approved the multi-family project at 271 El Camino Real in 2021 which includes 8 units designed for larger families. Additionally, the city approved the Glenview Terrace project which includes four below market rate for sale housing units.</td></tr>
<tr><td colspan="2">Program 5-E

Has the program been successful? The city's zoning ordinance does not mandate larger units be included in all 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.</td></tr>
<tr><td>Program 5-F: Expedite review and waive fees for affordable housing.

Continue to expedite review and waive planning and building fees for developers of affordable housing and housing for seniors and persons with disabilities.

<u>Actions:</u>
· Expedite permit review and waive planning, building, and license fees on projects providing housing affordable to very-low, low-, and moderate-income households, seniors, and persons with disabilities.
· Negotiate expedited permit review and fee waivers in future development agreements.</td><td>Program 5-F

Implementation:
· The city did not receive any request for fee waiver during the planning period.</td></tr>
<tr><td colspan="2">Program 5-F

Has the program been successful? Fee waivers require Council approval which sets a high bar. The city will consider fee waivers for future 100% affordable housing developments. This program has been incorporated into Program 2-G.</td></tr>
<tr><td>Program 5-G: Modify regulations to encourage affordable housing.

Modify development regulations in specific zoning districts to encourage housing affordable to very- low, low-, and moderate-income households.

<u>Actions:</u>
· 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 accordingly during the Zoning Ordinance Update.
· Encourage the development of small-size housing with small lots, studio apartments, shared housing, and other similar solutions to promote high quality of life in a small space.
· See also Program 3-I regarding reducing parking requirements.</td><td>Program 5-G

Implementation:
· The city approved two residential subdivisions (Glenview Terrace, Skyline Ridge) during the planning period which utilized small lot development.
· In 2019, the city updated its parking requirements to add more flexibility.
· In 2021, the city updated the Zoning Ordinance to codify the TCP development standards.</td></tr>
</table>

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-G

Has the program been successful? This program will be retained because it allows single-family residential subdivisions to reach their full dwelling unit density potential by allowing smaller lots and flexible development standards. This program will be applied to the Engvall development and potentially other former school sites in R-1 districts that might be disposed.

Program 5- H: Prevent Potential Displacement of Existing lower-income residents within San Bruno's Priority Development Area (PDA). Quantify, develop 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 21 Elements, to quantify, develop 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.	**Program 5- H** *Implementation:* · Program not implemented due to lack of resources.

Program 5- H

Has the program been successful? In 2021, 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 3-G.

Program 5-I: Promote the Second Unit Ordinance. Continue to inform homeowners about the Second Unit Ordinance which permits second units by- right on appropriate residential sites. Actions: · Inform property owners of the Second Unit Ordinance through the Focus newsletter 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 approving 32 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.	**Program 5-I** *Implementation:* · The city updated its Accessory Dwelling Unit Ordinance in 2021 in response to state law and experienced a significant increase in ADU approvals as a result. The city issued 36 permits to construct ADUs in 2022 and permits for 32 ADUs in 2023. ADUs will be an important strategy for increasing housing opportunities in low-density residential districts, particularly in higher resource neighborhoods.

Program 5-I

Has the program been successful? This program will be retained and revised, see program 4-P.

<table>
<tr><th colspan="2">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))</th></tr>
<tr><td>Program 5-J: Explore and consider new strategies to increase affordable housing.

Given the loss of redevelopment agencies 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.

<u>Actions:</u>
· 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 funds back to affordable housing, public benefit zoning, funding for substantial rehabilitation, partnering with employers 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 program(s).</td><td>Program 5-J

Implementation:
· The city adopted affordable housing impact and linkage fees in 2016 and to date has more than $14 million in its affordable housing fund, from fees collected from YouTube and other developers.
· The city revised its Affordable Housing Ordinance in 2021 to strengthen its provisions for onsite affordable units. The city has 117 affordable units in entitled pipeline as a result of the onsite requirement.</td></tr>
<tr><td colspan="2">Program 5-J

Has the program been successful? This program will be revised and retained, see program 1-G.</td></tr>
<tr><td>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, family status, or disability.

<u>Actions:</u>
· Continue to inform Realtors, builders, city staff, 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 Update, including additions and revisions to definitions as necessary.
· Develop a non-discrimination policy State and federal fair housing and non-discrimination laws.</td><td>Program 6-A

Implementation
· In 2021, 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.</td></tr>
<tr><td colspan="2">Program 6-A

Has the program been successful? This program will be retained and revised, see new programs 4-D and 4- E.</td></tr>
<tr><td>Program 6-B: Support organizations that provide housing services.

Cooperate with and support organizations providing housing information, counseling, and referral services, and handling</td><td>Program 6-B

Implementation:
· The city continues to provide annual funding</td></tr>
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<tr><td>complaints of housing discrimination.

<u>Actions:</u>
· 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 bill payments to low-income homeowners.</td><td>to HIP and LifeMoves.
· The city provides partners with and provides referrals to LifeMoves when engaging homeless individuals during Code enforcement activities.</td></tr>
<tr><td colspan="2">Program 6-B

Has the program been successful? This program will be retained and revised, see program 4-S.</td></tr>
<tr><td>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.

<u>Actions:</u>
· 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, students, persons with disabilities (including developmental), families, veterans, emancipated foster youth and others.
· Continue to consider appropriation of monies for support of various organizations during annual budget review. (City allocated $30,000 last year and this year to HIP)</td><td>Program 6-C

Implementation:
· The city continued its financial support of HIP Housing throughout the planning period.</td></tr>
<tr><td colspan="2">Program 6-C

Has the program been successful? Through its partnership with HIP Housing, the city has helped connect residents with additional rooms with individuals in need of housing. This program will be retained and revised, see program 4-M.</td></tr>
<tr><td>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.

<u>Actions:</u>
· Study alternatives and conduct public meeting(s) to designate a preferred location for an emergency shelter zone. Alternatives include the TOD area identified in the previous Housing Element and the M-1, Light Industrial Zone.
· Both alternative locations have sufficient and reasonably</td><td>Program 6-D

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.</td></tr>
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<tr><td>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 M- 1 zone includes 5.5 acres and 45 parcels.
· Prepare 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 may develop and apply 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 supply emergency and transitional housing to those in need.</td><td></td></tr>
<tr><td colspan="2">Program 6-D

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 1-L.</td></tr>
<tr><td>Program 6-E: Address identified need for extremely-low income and supportive housing.

Evaluate and amend the Zoning Ordinance as appropriate to comply with state law (GC Section 65583(a)(5) 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.

<u>Actions</u>:
· Evaluate and amend the Zoning Ordinance as appropriate to allow transitional and supportive housing uses within residential zones in accordance with state law (GC Section 65583(a)(5).
· 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 may be organized as:
o Apartment or single-room occupancy (SRO) buildings, townhouses, or single-family homes that exclusively house formerly homeless individuals and/or families;
o Apartment or SRO buildings, or townhouses that mix special-needs housing with general affordable housing;
o Rent-subsidized apartments leased in the open market; or
o Long-term set-asides of units within privately-owned buildings.</td><td>Program 6-E

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 any regional or non-profit agencies to identify opportunities for the development of supportive housing.</td></tr>
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<tr><td>• 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 pursue 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.</td><td></td></tr>
<tr><td colspan="2">Program 6-E

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 kept, modified, and incorporated into other programs. See program 2-G.</td></tr>
<tr><td>Program 6-F: Participate in regional coordination on homelessness.

Work with other cities, agencies, and the County to address needs of the homeless.

<u>Actions:</u>
• Assist homeless service providers in seeking 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.</td><td>Program 6-F

Implementation:
• The city continues its financial support of LifeMoves, an organization on the peninsula that helps homeless people find housing. Additionally, Police staff coordinate with LifeMoves to connect unsheltered individuals in the city with services and housing through the Homeless Outreach Team (HOT). LifeMoves provides the city with semiannual reports on their work in the city.</td></tr>
<tr><td colspan="2">Program 6-F

Has the program been successful? This program has been successful because it has helped many unsheltered individuals find housing and services in the city. The program will be kept and incorporated into Program 4-S.</td></tr>
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