

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

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October 21, 2024

Peter Gilli, Director  
Community Development Department  
City of San Bruno  
567 El Camino Real  
San Bruno, CA, 94066

Dear Peter Gilli:

**RE: City of San Bruno 6<sup>th</sup> Cycle (2023-2031) Adopted Housing Element**

Thank you for submitting the City of San Bruno (City) housing element that was adopted August 27, 2024, and received for review on September 25, 2024. In addition, the California Department of Housing and Community Development (HCD) received Ordinances 1954, 1955 and 1956 and Resolution Number 2024-77 related to various required rezoning to meet statutory requirements. Pursuant to Government Code section 65585, HCD is reporting the results of its review.

HCD is pleased to find the adopted housing element in substantial compliance with State Housing Element Law (Gov. Code, § 65580 et seq) as of the date of this letter. The adopted element was found to be substantially the same as the revised draft element that HCD's August 23, 2024, review determined met statutory requirements. This finding is based on, among other things, completion of Programs 3 (Adequate Sites) and 9 (Streamline Review) related to rezoning to accommodate the regional housing need allocation (RHNA), make available prior identified sites and, among other provisions, to permit housing developments with 20 percent affordability for lower-income households without discretionary action at minimum densities of 20 units per acre pursuant to Government Code section 65583.2, subdivisions (h) and (i).

Additionally, the City must continue timely and effective implementation of all programs including but not limited to the following:

- Programs 3a, 3d, and 3f (Adequate Sites)
- Programs 4e and 4f (Accessory Dwelling Units)
- Program 5a (Expand Housing Opportunities)
- Program 6c (City-Owned Sites)
- Program 7 (Encourage Lot Consolidation)
- Program 8h (SB4/AB1851 Implementation)
- Program 9 (Streamline Review Processes)
- Program 10a (Parking Standards)

- Program 10e (Objective Design Standards)
- Program 10g (SB9 Implementation)
- Program 10h (Ground Floor Commercial Flexibility)
- Program 11 (Comply with State Laws)
- Program 16 (Place-Based Strategies)
- Program 18 (Tenant Protections)

The City must monitor and report on the results of these and other programs through the annual progress report, required pursuant to Government Code section 65400. Please be aware, Government Code section 65585, subdivision (i) grants HCD authority to review any action or failure to act by a local government that it determines is inconsistent with an adopted housing element or housing element law. This includes failure to implement program actions included in the housing element. HCD may revoke housing element compliance if the local government's actions do not comply with state law.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the City to consider timing provisions and welcomes the opportunity to provide technical assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at: <https://www.opr.ca.gov/planning/general-plan/guidelines.html>.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant, the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities program, and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City now meets housing element requirements for these and other funding sources.

HCD appreciates the hard work and collaboration that the housing element update team provided throughout the housing element update and review. HCD wishes the City success in implementing its housing element and looks forward to following its progress through the General Plan annual progress reports pursuant to Government Code section 65400. If HCD can provide technical assistance in implementing the housing element, please contact Anthony Errichetto, of our staff, at [Anthony.Errichetto@hcd.ca.gov](mailto:Anthony.Errichetto@hcd.ca.gov).

Sincerely,



Paul McDougall  
Senior Program Manager