2023–2031
HOUSING ELEMENT

February 2024

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ACKNOWLEDGEMENTS

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EXECUTIVE MANAGEMENT

Tom Williams, City Manager
Isabel Carlos, Assistant City Manager

CITY STAFF

Andrew Mogensen, Community Development Director
Roscoe Mata, Planning Manager
Nestor Guevara, Associate Planner

CONSULTANT TEAM

Harris & Associates

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EXECUTIVE SUMMARY

California law requires that a housing element be included in the general plan as one of the seven mandatory “elements”, or chapters, which express the community’s values, goals, and vision for the future.

The Housing Element covers the eight-year planning period beginning October 15, 2023, and ending October 15, 2031, (the "6th Cycle” planning period) and accomplishes the following:

- Presents a comprehensive assessment of local housing conditions and lays out a series of goals, policies, and programs to assist the City of Millbrae (City or Millbrae) in meeting the housing needs of current and future residents at all income levels.
- Identifies and analyzes the City’s existing and projected housing needs
- Addresses numerous requirements resulting from a slate of new state housing laws designed to address factors contributing to the statewide housing shortage.
- Contains a detailed work program for the preservation, improvement, and development of housing, including how and where the City can accommodate its fair share of the Bay Area region’s need for new housing.

The statewide housing mandate for all cities and counties to accommodate their share of housing needs is known as the Regional Housing Needs Assessment (RHNA). The City, along with other jurisdictions statewide, faces substantial challenges in providing sufficient affordable housing.

Changes to 6th Cycle Housing Element Updates

RHNA

One of the most consequential changes for the 6th Cycle is that the RHNA goals throughout the State of California (State) have significantly increased from previous cycles. For Millbrae, this has resulted in an increase from 663 units for the 5th Cycle (2015-2023), to 2,199 units for the 6th Cycle (2023-2031). In addition, the City must provide substantial evidence that the nonvacant sites selected are appropriate and likely to be available for housing development during the planning period.

Affirmatively Furthering Fair Housing

Another major change for the 6th Cycle is the State’s “Affirmatively Furthering Fair Housing” (AFFH) requirements. Affirmatively furthering fair housing means taking meaningful actions that address significant disparities in housing needs and access to opportunity, replacing segregated

living patterns with 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. This is accomplished through a detailed analysis of issues, evaluation of proposed housing sites, and development of housing element programs to address identified issues. The detailed AFFH analysis is provided in Appendix B, but the insights gained from the analysis are threaded throughout the element and specifically reflected in the Sites Inventory and Housing Plan.

Chapter 1 - Introduction

The City's Housing Element has been updated for the 2023–2031 6th Cycle Planning Period. The Housing Element is part of the Millbrae General Plan, which is currently undergoing its latest update. The General Plan Update process started in 2015 as a comprehensive update to the existing General Plan, along with the preparation of a specific plan, and the related program Environmental Impact Report for California Environmental Quality Act (CEQA) compliance. The Millbrae General Plan will establish the vision of planning and land use for Millbrae until 2040.

The guiding principle for a healthy community in the City's General Plan states:

> *"Encourage healthy lifestyles for all residents and visitors by increasing opportunities for physical activity, availability of nutritious foods, quality education, realistic living wages, access to affordable healthcare and childcare,* ***options for affordable housing****, clean air and water, and a safe environment that promotes walking and biking."*

As widely reported, California is amid a housing crisis where demand greatly outweighs supply. Additionally, *overall wage growth has not kept pace with increases in housing costs, making median home prices and rents out of reach for a large population within the State*. According to the Joint Center for Housing Studies at Harvard University, renters in California have to earn 120% or more of the area median income (AMI) to afford a median-priced home. This severe spending on housing costs has contributed significantly to various housing problems, such as a lack of affordability and homelessness.

The California Government Code requires that a Housing Element be included in a city's General Plan as one of seven mandatory elements that express the community's values, goals, and vision for the future. The City of Millbrae Housing Element identifies and analyzes the City's existing and projected housing needs and contains a detailed outline and work program of the City's goals, policies, quantified objectives, and programs for the preservation, improvement, and development of housing for a sustainable future. The overall goal of this Housing Element is to provide safe and decent housing for all economic segments of the community.

Chapter 2 – Housing Needs Assessment

Millbrae is a growing community in San Mateo County that serves as the transportation hub for the San Francisco Bay Area. To quantify housing needs the State of California develops housing demand projections and apportions these projections to each region. In the Bay Area, the Association of Bay Area Governments (ABAG) allocates the State's regional projected demand to individual jurisdictions. This is referred to as the Regional Housing Needs Assessment (RHNA) and is intended to reflect the projected housing demand of each jurisdiction for the upcoming planning period. State law requires that jurisdictions incorporate the RHNA allocation into their housing element update. **The required RHNA for the City is based on housing needs over the next 8 years** and is summarized in the table below.

Table ES -1. 6th Cycle RHNA

Income Category	RHNA
Extremely Very Low/Very Low (0% - 50% AMI)	575
Low (51% - 80% AMI)	331
Moderate (81% - 120% AMI)	361
Above Moderate (over 120% AMI)	932
Total Units	**2,199**

While the total number of RHNA required units is 2,199, HCD guidance requires that all cities and counties include more than the required RHNA - typically an additional buffer of 15-30% with a special focus on lower-income housing units. Therefore, the total number of units in any jurisdiction's housing element will exceed the RHNA to accommodate that buffer. With that in mind and based on the City's site inventory analysis included in the Housing Element update, the City must accommodate a minimum of 2,335 total new units, allocated at different affordability levels.

Demographic and housing data were analyzed to reveal Millbrae's housing needs and trends, which helps inform program development and prioritization.

Summary of Key Findings

- **Population** – The City's population has been growing slightly faster than San Mateo County (San Mateo County or County) with 10% growth between 2000 and 2020, compared to 9% for the County. However, it has grown at a rate below that of the Bay

Area, which increased by 15% between 2000 to 2020. The increase throughout the region is mostly due to natural growth (births minus deaths) and a strong economy that draws new residents to the region.

- **Income** – Millbrae has a comparable percentage of lower-income households than the rest of the County, with 39% and 40% of households earning less than 80% of the Area Median Income (AMI), respectively. In addition, the City has the same percentage of lower-income households as the Bay Area as a whole.
- **Poverty** – Currently, people of color in the County are more likely to experience poverty. The groups with the highest poverty rates in Millbrae are Black/African American residents (9.3%) and Asian/Pacific Islander residents (6.9%). On the other hand, American Indian/Alaskan Native residents have the lowest poverty rate (2.5%).
- **Age** – Millbrae residents are overall older than they were in the past. The median age increased from 41.5 in 2000 to 43 in 2019. In that year, 19% of the population was over 65, and 19% of the population was under 18 years old.
- **Race/Ethnicity** – In 2020, 33.9% of Millbrae's population was White, while 0.6% was African American, 48.8% was Asian, and 11.4% was Latinx. People of color in Millbrae comprise a proportion above the overall proportion in the Bay Area as a whole.
- **Employment** – Millbrae residents most commonly work in the Health & Educational Services industry. From January 2010 to January 2021, the unemployment rate in Millbrae decreased by two percentage points. Since 2010, the number of jobs located in the jurisdiction increased by 930 (19.6%). Additionally, the jobs-household ratio in Millbrae has increased from 0.69 in 2002 to 0.7 jobs per household in 2018, pointing to the fact that while Millbrae needs more housing development, it is especially lacking in jobs for its residents. This is particularly important when considering the replacement of commercial uses with residential-only uses.
    - **Unemployment** – Jurisdictions in the Bay Area experienced a sharp rise in unemployment in 2020 due to impacts related to the COVID-19 pandemic, though with a general improvement and recovery in the later months of 2020. As of January 2021, Millbrae's unemployment rate was 5.9%, which was slightly lower than the regional unemployment rate of 6.6%, but much lower than its pandemic-related high rate of 11.1% in April 2020.
- **Number of Homes** – The number of new homes built in the Bay Area has not kept pace with the demand, resulting in longer commutes, increasing prices, and exacerbating issues of displacement and homelessness. The number of homes in Millbrae increased

by 3.1% from 2010 to 2020, which is below the growth rate for the County and below the growth rate of the region's housing stock during this period.

- **Home Prices** – A diversity of homes at all income levels creates opportunities for all Millbrae residents to live and thrive in the community. Given high job growth and low housing growth in the County, the cost of housing in the City has increased significantly in the past decade:
    - **Ownership** – In 2020, the average sales price of a single-family home in Millbrae was approximately $1,846,240. Home prices increased by 102.7% from 2010 to 2020.
    - **Rental Prices** – The typical median contract rent for an apartment in Millbrae was $2,330 in 2019. Rental prices increased by 77% from 2009 to 2019. To rent an apartment at the median level without a cost burden, a household would need to make $93,320 per year.
- **Housing Type** – In 2020, 62.4% of homes in Millbrae were single-family detached, 3.4% were single-family attached, 3.3% were small multifamily (2-4 units), and 30.5% were medium or large multifamily (5+ units). Between 2010 and 2020, the number of multifamily units increased more than single-family units. Moreover, Millbrae's housing consists of more detached single-family homes than the region as a whole (62% compared to 52% in the Bay Area).
- **Cost Burden** – The U.S. Department of Housing and Urban Development (HUD) 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 Millbrae, 17% of households spend 30%-50% of their income on housing, while 18% of households are severely cost-burdened and use the majority of their income for housing.
- **Displacement/Gentrification** – According to research from The University of California, Berkeley, no households in Millbrae live in neighborhoods that are susceptible to or experiencing displacement or in areas at risk of or undergoing gentrification. Approximately, 51% of households in Millbrae live in neighborhoods that are not affordable to low-income households due to prohibitive housing costs. There are various ways to address displacement including ensuring new housing at all income levels is built.
- **Neighborhood Designations (Resource Areas)** – In Millbrae, 100% of residents live in neighborhoods identified as "Highest Resource" or "High Resource" areas by State-

commissioned research, while 0% of residents live in areas identified by this research as "Low Resource" or "High Segregation and Poverty" areas. These neighborhood designations are based on a range of indicators covering areas such as education, poverty, proximity to jobs and economic opportunities, low pollution levels, and other factors.

- **Special Housing Needs** – Some population groups may have special housing needs that require specific program responses, and these groups may experience barriers to accessing stable housing due to their specific housing circumstances. In Millbrae, 9.1% of residents have a disability of any kind and may require accessible housing. Additionally, 9.5% of Millbrae households are larger households with five or more people, who likely need larger housing units with three bedrooms or more. 8.7% of households are female-headed families, which are often at greater risk of housing insecurity.

Chapter 3 – Housing Constraints

The development and improvement of housing can be constrained by several governmental and non-governmental factors. State law requires the City to analyze governmental constraints such as land use controls, fees, and exactions, on- and off-site improvement requirements, building codes and enforcement thereof, permit and processing procedures, and potential constraints on the development or improvement of housing for persons with disabilities. Non-governmental constraints must also be analyzed (including the availability and cost of land, construction costs, and labor availability). **The constraints are identified in the following five categories**:

- Development Impact and Permit Fees
- Development/Improvement of Housing for People with Disabilities
- Zoning for a Variety of Land Use Types/Policies
- Availability and Cost of Land
- Construction Costs and Labor Availability

Table ES-2 provides a summary of all identified constraints which generally fall into 2 categories – constraints as a result of State law changes and market constraints, as well as a sampling of programs to address or mitigate constraints.

Table ES-2. Constraints and Programs

Constraint Category	Specific Constraint(s)	Constraint - Result of State Law Change?	Local (within City's Control) or Market (Private Market Constraint)	Examples of Programs to Address Constraint[1]
Development Impact and Permit Fees	Processes and procedures that affect project permitting due to costs.	Yes	Local	**HIP-14.** Residential Development Feasibility Study
Development/ Improvement of housing for people with disabilities	Limited funding to address health and safety upgrades, energy efficiency, removal of architectural barriers, and inclusion and accommodation services.	Yes	Local	**HIP-26.** Coordination Service Providers & Reasonable Accommodations Updates
	Restrictive land use policies and zoning provisions can constrain the development of housing for persons with disabilities.			**HIP-43.** Update Zoning Ordinance – Shelters, Transitional/ Supportive, Group Care
Zoning for Variety of Land Use Types/Policies	Land use controls can constrain the maintenance, development, and improvement of housing through the establishment and distribution of different land uses.	Yes	Local	**HIP-18.** Encourage & Incentivize ADUs
				HIP-27. Update Density Bonus Ordinance
				HIP-48. Reduced Parking Requirements
				HIP-49. Citywide Objective Residential Design Standards
Availability and Cost of Land	Limited supply of vacant land combined with high demand for residential units results in increased land costs.	No	Market	**HIP-42.** Implement Reduced Parking for Affordable Housing
				HIP-47. Maintain/ Update Site Inventory
Construction Costs and Labor Availability	Significant increases in lumber and other construction materials, as well as the high demand for housing, will likely further increase residential construction costs.	No	Market	**HIP-31.** Pursue State & Federal Funding for Affordable Housing
				HIP-36. Funding, Incentives & Concessions for Extremely Low-Income Units

[1] *All programs to mitigate constraints are included in Chapter 3, Housing Constraints and Chapter 8, Housing Plan.*

Chapter 4 – Housing Resources and Opportunities

Millbrae continues to aim to be a leader in San Mateo County for progressive housing policies. Table ES-3, Resources and Opportunities, identifies the federal, state, regional, and local resources, and opportunities the City has pursued housing development.

Table ES-3. Resources and Opportunities

	Funding Source	Amount	Notes
Federal	Annual CDBG	TBD	During the five-year period of the Consolidated Plan, the County (San Mateo County or County) anticipates an estimated $14.6 million in CDBG funds, although the final amount of funding the City will receive is subject to Federal appropriations and changes in the types of data used to allocate formulas to each program.
State	REAP (Regional)	TBD	Higher Impact Transformative set aside for all eligible entities (5 percent, or $30 million)
	Grants for Affordable Housing Projects/Developments & other grants expected over an 8-year planning period	TBD	Range from annual allocations of formula entitled grants to vouchers and competitive funding programs.
	Low Income Housing Tax Credits	TBD	Two types of Federal tax credits administered by the State are available - 9% (competitive) and 4% credits (usually non-competitive)
Regional	REAP Grant (State)	TBD	Allocated to ABAG who then allocates to cities/counties
Local	Inclusionary Housing Fees	TBD	The City adopted an Inclusionary Housing ordinance that requires new ownership units developed in the City to include affordable units specific income levels. No inclusionary housing fees collected to date.
	Commercial Linkage Fees	TBD	Helps implement the Housing Element by creating a fiscal mechanism to meet the demand for additional affordable housing created by new commercial development. No Commercial Linkage fee revenues collected to date.
	LMIHAF	$13.9 Million	Anticipated for 2022-2023

Chapter 5 – Housing Accomplishments

The City must evaluate the results from housing programs implemented during the previous 5th Cycle Housing Element. The review of past programs discusses the progress, effectiveness, and appropriateness of the previous goals, objectives, policies, and programs. **The City achieved many positive results**, including the major housing accomplishments listed below:

- Permitted 919 above moderate-income housing units.
- Adopted the updated Millbrae Station Area Specific Plan, which was zoned for the potential development of 1,750 units close to transit.
- Currently in the process of approving the Downtown & El Camino Real Specific Plan (DECRSP), which was released for public review on June 16, 2022.
- Updated its website to provide homeowners with better information on code requirements and ways to address any code enforcement issues.
- Adopted a series of measures to ensure more affordable housing in Millbrae:

  - Gateway at Millbrae Station project approval, which includes 400 new housing units of which 100 are affordable.
  - Millbrae Serra Station Transit Oriented Development project approval which includes 488 units of which 73 are affordable.
  - Accessory Dwelling Unit (ADU) Ordinance adoption and incorporation of new housing laws and community feedback to its objective design standards.
  - Initiation of the Millbrae General Plan update, along with the DECRSP. Both are expected to be adopted by late 2022.
  - Amendment to the Municipal Code to establish a 15%, on-site, affordable housing unit inclusionary requirement.
- Adopted a climate action plan in 2020, focusing on promoting energy conservation.
- Addressed the housing needs of special needs populations through the following:
  - Allocated funding for and refer individuals with special needs to the Human Investment Project Housing Home Sharing Program.
  - Adopted Ordinance 748, which establishes specific written procedures for requesting and granting reasonable accommodations for housing for persons with disabilities.
  - Worked with the Golden Gate Regional Center to implement an outreach program that informs families about housing and services for persons with developmental disabilities.
  - Continued to have the Building Official as the City's Americans with Disabilities Act Coordinator.
  - Approved funding for a pilot program with the San Mateo County Human Services Agency to provide homeless outreach services at the Millbrae BART Station and surrounding areas.

Chapter 6 – At-Risk Affordable Housing

State law requires that all income-restricted affordable units at risk of converting to market-rate units be identified in the Housing Element update. It is important to note that there are no affordable housing units in the City at risk of converting to market-rate units over the next 10 years.

Chapter 7 – Adequate Sites Inventory Analysis and Methodology

The Site Inventory prepared for the 2023–2031 Planning Period demonstrates a capacity for at least 3,861 housing units, including 1,062 housing units on sites adequate for lower-income housing. Pursuant to California Government Code, Section 65583.1.

It is important to note that City currently has almost 2,000 housing units that are in the planning stages, are entitled and/or under construction. This pattern of development strongly indicates that the RHNA allocation is achievable over the next 7-8 years.

More specifically, the City has identified 1,701 pending or entitled housing units that will be constructed during the 6th Cycle Planning Period. These approved, entitled, and in-process projects include seven developments with units affordable to 69 very low-, 156 low, and 44 moderate-income households. The site inventory analysis demonstrates the City's ability to accommodate RHNA through a combination of the remaining vacant residential sites in Millbrae and non-vacant sites that can be redeveloped with a residential component.

Table ES-4, Capacity Determination (also shown as Table 7.1, Capacity Determination in Chapter 7, Sites Inventory, in the Housing Element) summarizes the City's determination that there is sufficient capacity to accommodate the City's RHNA by income and categorizes credits and sites by zoning, representing land suitable and available for residential development, remaining consistent with State planning guidance.

Table ES-4. Capacity Determination

	Units by Income Level				
	VLI	LI	Mod.	Above Mod.	Total
RHNA	**575**	**331**	**361**	**932**	**2,199**
Alternative Methods to Meet the RHNA (Credits)					
Entitled or Proposed Projects	69	156	44	1,432	1,701
Accessory Dwelling Unit Potential	34	34	33	11	112
Subtotal	**103**	**190**	**77**	**1,443**	**1,813**
Net RHNA (after credits are applied)	**472**	**141**	**284**	**(511)**	**386**
Step #1 Determination of Opportunity Sites (Existing Zoning and Zone Changes in Process)[1]					
Corridor Mixed Use (CMU)	508	162	0	792	1,462
Residential Mixed Use (RMU)	61	38	387	100	586
Step #1 Subtotal	**569**	**200**	**387**	**892**	**2,048**
Total (Credits & Step #1)	**672**	**390**	**464**	**2,335**	**3,861**
Surplus/(Shortfall)	**97**	**59**	**103**	**1,403**	**1,662**
No Net Loss Buffer Surplus/(Shortfall), as a percent of RHNA[2]	**17%**	**18%**	**29%**	**-**	**-**

[1] The determination of opportunity sites utilizes the proposed zoning and densities of the Downtown and El Camino Real Specific Plan (DECRSP), which the City expects to adopt by the end of 2022. HCD allowed the utilization of proposed zoning and densities during a meeting with staff on July 29, 2022.

[2] HCD recommends a 15-30% buffer for lower-income (very low and low) sites to protect the City from the No Net Loss provision. The City included a buffer for the moderate-income level for the same reason. The City calculated its buffer as a percentage of the gross RHNA (Before any credits were applied).

When determining sites to include in the inventory to meet the lower-income housing need, HCD recommends that a local government first identify development potential in high-opportunity areas. **A number of the City's housing site inventory is located within the Core Area, which is classified as a high/highest opportunity area** (the Core Area is located in the City's downtown area along El Camino Real and near the City's BART station). **New State laws for the 6th Cycle Housing Element require that there be a 15-30% buffer of additional units, particularly at affordable levels.** Therefore, the site inventory shown in the table above does exceed that shown in Table ES -1, 6th Cycle RHNA.

Chapter 8 - Housing Plan

This section of the draft Housing Element establishes the direction for policies, programs, and actions for the goals related to community needs. Some of the goals, policies, and programs have not changed from the 5th Cycle Housing Element (2015-2023), while others have been modified and/or added to address the City's significant RHNA allocation. Table ES-5, Housing

Programs, identifies unchanged, modified, and new programs as needed to address constraints, new legislation, or fair housing issues.

Table ES-5. Housing Programs

Unchanged Programs	Modified programs	New Programs
HIP-15. Continue to Implement the Millbrae Station Area Specific Plan	**HIP-2**. Annual Housing Element Reporting	**HIP-1**. Triennial Advocacy Meeting with Affordable Housing Property Owners/Managers, Fair Housing Providers, Service Providers, Housing Advocates, and Non-Profits
HIP-19. BMR Resale and Rental Controls	**HIP-6**. Encourage the Rehabilitation of Substandard Housing Units	**HIP-3**. Annual Meeting with San Mateo County Housing Authority and the San Mateo County Consortium to Identify Affordable Housing Opportunities
HIP-25. Parking Requirement Options in Downtown Area	**HIP-7**. Residential Energy Conservation Program	**HIP-4**. Monitor Legislative Changes
HIP-29. Airport Development Restrictions	**HIP-9**. Reduce Exposure to Environmental Pollution	**HIP-5**. Support Local School Districts for Better Educational Outcomes
HIP-30. Employee Housing	**HIP-11**. Encourage Section 8 Rental Housing Assistance	**HIP-8**. Energy Conservation Grant Funding
	HIP-12. Advertise Human Investment Project (HIP) Home-Sharing Program to Residents	**HIP-10**. Coordinate with the SFO Community Roundtable and C/CAG to Monitor Noise and Air Quality Outcomes
	HIP-16. Downtown and El Camino Real Specific Plan Adoption and Implementation	**HIP-13**. Replacement Housing for Existing Lower Income Units on Sites for Residential Development

Unchanged Programs	Modified programs	New Programs
	HIP-20. BMR Eligibility Guidelines	**HIP-14**. Conduct a Residential Development Feasibility Study
	HIP-21. Services for Unhoused Persons	**HIP-17**. Rezone for Lower Income Sites
	HIP-23. Prioritize Review and Expedite Development of Affordable and Special Needs Projects	**HIP-18**. Encourage and Incentivize Accessory Dwelling Units (ADUs) - ***in response to Assembly Bill (AB) 671***
	HIP-26. Coordination with Disability Rights Service Providers and Updates to Reasonable Accommodations for People with Disabilities	**HIP-22**. Triennial Housing Developer Meeting/Developer Outreach
	HIP-27. Update Density Bonus Ordinance - ***required to ensure compliance with state law***	**HIP-24**. Encourage and Facilitate Lot Consolidation
	HIP-28. Anti-Displacement Measures	**HIP-31**. Pursue State and Federal Funding for Affordable Housing – ***this accommodates HCD requirements***
	HIP-32. Local Funding for Affordable Housing - ***modified to include a targeted report of available funding***	**HIP-33**. Allocate CDBG Funding for Housing
	HIP-42. Implement Reduced Parking for Affordable Housing	**HIP-34**. Facilitate Access to Affordable Housing for Residents
		HIP-35. Assist with Development of Lower-Income Housing - ***created to comply with HCD requirements***

Unchanged Programs	Modified programs	New Programs
		HIP-36. Funding, Incentives, and Concessions for Extremely Low-Income Developments - ***created to comply with HCD requirements***
		HIP-37. Advertise Available Resources
		HIP-38. Legal Assistance for Renters and Support for Fair Housing Services Provider
		HIP-39. Meet with Service Providers and Advertise Employment Resources for Persons with Disabilities
		HIP-40. Collaboration with San Mateo County Vocational Rehabilitation Services
		HIP-41. Implement the City's Economic Development Plan
		HIP-43. Update the City's Zoning Ordinance and Specific Plans Related to Emergency Shelters, Low-Barrier Navigation Centers, Transitional and Supportive Housing, and Group Care Facilities to Comply with Current Laws - ***required for compliance with State requirements, as established by AB 139, AB 2162, and Senate Bill (SB)48***
		HIP-44. Update the City's Zoning Ordinance

Unchanged Programs	Modified programs	New Programs
		HIP-45. Update the Zoning Ordinance, MSASP, and DECRSP to Comply with Residential Care Facilities Requirement
		HIP-46. Provide Information and Examples of Incentives/Concessions for Developers
		HIP-47. Maintain/Update the Site Inventory
		HIP-48. Reduced Parking Requirements
		HIP-49. Citywide Objective Residential Design Standards.
		HIP-50. Inclusionary Housing Impact Fee Study
		HIP-51. Streamline the Permit Processing and Approval Process for Residential Development
		HIP-52. Pilot City Mortgage Assistance Program
		HIP-53. Additional Density Bonus Incentives
		HIP-54. Allow Additional Affordable Housing in P-D Zones
		HIP-55. Housing Mobility Coordinator

Unchanged Programs	Modified programs	New Programs
		HIP-56. Provide New Housing Choices in Lower-Density Neighborhoods Through Incentives for SB9 Units in R1-Zone Neighborhoods
		HIP-57. By-Right Approval on Reuse Sites
		HIP-58. Tools for Financing Infrastructure and Development

Appendix A – Public Engagement

The City conducted a robust public outreach process outlined in Table ES-6 below.

Table ES-6. Community Engagement

Date	Meeting/Activity/Action
March 2021	**City Webpage** - As a starting point for accomplishing extensive outreach, the City developed a clear online presence with all the information needed to understand the update process and how to participate in this process. The City also provided a supplemental Housing Element 101 Fact Sheet.
March 2021	**Let's Talk Housing Website (21 Elements)** - Supplemental to the City's webpage. Helped to explain what a housing element is, why it matters, and how to get involved. It was made available in Arabic, Chinese, English, Spanish and Tagalog, designed to be responsive on all types of devices and included accessibility features.
March 30, 2021	**Countywide Meeting # 1 (21 Elements)** - 90-minute virtual meeting about the Housing Element update provided community members with an introduction to the Housing Element update, why it matters, information on the Let's Talk Housing outreach effort, and countywide trends. Breakout rooms were also provided for discussion with community members on housing needs, concerns, and opportunities, and answers to any questions. A poll was given during the meeting, to identify who was joining us and more importantly who was missing from the conversation, including if they rent or own, who they live with, their age, and ethnicity. Time for questions was allotted throughout, and meeting surveys were provided to all participants after the meeting along with all discussed resources and links
April 2021	**Resident Survey Analysis (21 Elements)** - The resident survey was available online, in both Spanish and English, in a format accessible to screen readers, and promoted through jurisdictional communications and social media and through partner networks. A total of 2,382 residents participated. Some of the findings included: Jurisdictions with the highest percentage of respondents who seriously looked for rental housing include Millbrae (74%), San Mateo (73%), and Redwood City (72%); Millbrae residents experience the greatest difficultly paying their property taxes among jurisdictions in San Mateo County; Millbrae, San Mateo and Redwood City had the highest percentage of respondents who seriously looked for ownership housing. If denied, the reasons included: Real estate agent told me I would need to show I was prequalified with a bank (29%) and a bank would not give me a loan to buy a home (23%).
April 2021	**All About RHNA Webinar** - Created to provide information and answer community questions about the RHNA process. 264 people registered and 80 questions were answered over three hours.

Date	Meeting/Activity/Action
May 6, 2021	**Countywide Meeting # 2 (21 Elements)** - 90-minute virtual meeting about the Housing Element update provided community members with an introduction to the Housing Element update, why it matters, information on the Let's Talk Housing outreach effort, and countywide trends. Breakout rooms were also provided for discussion with community members on housing needs, concerns, and opportunities, and answers to any questions. A poll was given during the meeting, to identify who was joining us and more importantly who was missing from the conversation, including if they rent or own, who they live with, their age, and ethnicity. Time for questions was allotted throughout, and meeting surveys were provided to all participants after the meeting along with all discussed resources and links.
September 27, 2021	**Fair Housing Stakeholder Session** - 8 stakeholder groups provided feedback on concern for the end of the eviction moratorium, the importance of transit-oriented affordable housing and anti-displacement policies, and the need for education around accessibility regulations and tenant protections.
October 18, 2021	**Housing Advocates Stakeholder Session -** 6 stakeholder groups provided feedback on Concern for rent increases and the need for ongoing outreach to underserved and diverse communities, workforce housing, deeply affordable and dense infill, and tenant protections for the most vulnerable.
October 13, 2021 - December 1, 2021	**Creating A More Affordable Future: Let's Talk Housing Zoom webinar and discussion series (21 Elements)** - The 4-part series focused on the following topics and how they intersect with the Bay Area's housing challenges and opportunities: Why Affordability Matters; Housing and Racial Equity; Housing in a Climate of Change; Putting it All Together for a Better Future. The series included speaker presentations, audience Q&A, breakout sessions for connection and debrief discussions. The sessions were advertised and offered in Spanish, Mandarin and Cantonese, though participation in non-English channels was limited.
November 1, 2021	**Builder Meeting Stakeholder Session** - 12 stakeholder groups provided feedback on local funding, tax credit availability, and concern that appropriate sites limit affordable housing while sites, construction costs, and city processes limit market-rate housing.
November 15, 2021	**Service Provider Stakeholder Session -** 10 stakeholder groups provided feedback on more affordable housing and vouchers or subsidies for market-rate housing are needed, along with on-site services and housing near transit, and jurisdictions should work with providers and people experiencing issues before creating programs.
June 16, 2022 - August 3, 2022	**Community Survey** - The City provided a community survey with a total of 61 respondents. The results of the survey indicate the following: Majority are satisfied with their housing choices; Affordability is the biggest housing issue - To address housing, the top two programs were rezoning to allow for higher density and conversion of commercial to residential and facilitate ADUs, To remove barriers to housing, streamline development and require that affordable units be part of more projects; Almost half of respondents feel burdened from pollution and noise from the San Francisco Airport (the City is adjacent to the Airport); Existing Fair Housing services are not adequate (58%).
June 29, 2022	**Affordable Housing Service Provider Stakeholder Meeting # 1** - Meeting with service providers to gather insight and thoughts on how the City can encourage affordable housing development along with some of the challenges/opportunities faced as an affordable housing service provider.
June 30, 2022	**Community Workshop** - A total of 15 people attended (10 community members and five city staff/consultants). The presentation involved live polling to receive additional input. Poll results indicated that affordability and location of housing (lack of housing near transit and jobs in the downtown area) were the primary issues of concern. Question during the workshop were focused on affordable housing, ways for the community to participate in the process and what assurances are in place that housing will be implemented.
June 30, 2022	**Market Rate Developer Stakeholder Meeting # 1** - Meeting with developers to gather insight and thoughts on how the City can encourage affordable housing development along with some of the challenges/opportunities faced as an affordable housing developer.
July 8, 2022	**Affordable Housing Service Provider Stakeholder Meeting # 2** - Meeting with service providers to gather insight and thoughts on how the City can encourage affordable housing development along with some of the challenges/opportunities faced as an affordable housing service provider.
July 11, 2022	**Affordable Housing Developer Stakeholder Meeting # 1** - Meeting with developers to gather insight and thoughts on how the City can encourage affordable housing development along with some of the challenges/opportunities faced as an affordable housing developer.
September 19, 2022	**Planning Commission Meeting -** Presented draft Housing Element Update to and answered inquiries from the Planning Commission.
October 11, 2022	**City Council Study Session** - Presented the Housing Element Update to the City Council and answered inquiries from the Council and the public in preparation for a future City Council meeting to approve the submittal to HCD.

Appendix B – Affirmatively Furthering Fair Housing (AFFH)

All Housing Elements prepared on or after January 1, 2021, must address the requirements of AB 686 to affirmatively further fair housing. Jurisdictions must take "meaningful actions "to combat discrimination overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity for persons of color, persons with disabilities, and other protected classes through the administration of programs and activities relating to housing and community development.

Table ES-7 presents the **fair housing findings** (i.e., fair housing issues identified by the data) which include the following:

- A lack of housing choices resulting from a lack of affordable housing
- Displacement Risk
- Higher unemployment rate for persons with disabilities
- Environmental Hazards
- Inadequate Fair Housing resources and/or outreach capacity
- Lower educational outcomes for racial and ethnic minority students

Table ES-7 also lists a sampling of programs in the AFFH to address or mitigate these findings/issues.

Table ES-7. AFFH Findings and Examples of Programs

AFFH Finding	Lack of Access to Housing Opportunity (lack of affordable housing)	Displacement Risk	High Unemployment Rates/Lack of Access to Persons with Disabilities	Environmental Hazards	Lack of Fair Housing Resources/Outreach Capacity	Lower educational outcomes for racial/ethnic minority students
Sampling of programs to address findings	**HIP-31.** Pursue Funding for Affordable Housing	**HIP-28**. Anti-Displacement Measures	**HIP-26.** Coordination with Disability Rights Service Providers & Updates to Reasonable Accommodations	**HIP-8.** Energy Conservation Grant Funding	**HIP-1.** Advocacy Meeting with Fair Housing Providers	**HIP-5.** Support Local School Districts for Better Educational Outcomes
	HIP-36. Funding & Incentives for Extremely Low-Income Developments	**HIP-38.** Legal Assistance for ReHIP-38. Legal Assistance for Renters and Support for Fair Housing Services Provider	**HIP-39.** Meet with Service Providers and Advertise Employment Resources	**HIP-9.** Reduce Exposure to Environmental Pollution	**HIP-28.** Anti-Displacement Measures	**More Affordable Housing through Programs = Better Educational Outcomes**
	HIP-23. Prioritize Review and Expedite Development - Affordable & Special Needs Projects	**HIP-1.** Advocacy Meetings with Fair Housing & Service Providers, Housing Advocates & Non-Profits	**HIP-40.** Collaboration with County Vocational Rehabilitation Services	**HIP-10.** Coordinate with the SFO Community Roundtable and C/CAG to Monitor Noise/Air Quality Outcomes	**HIP-26.** Coordination with Disability Rights Service Providers and Updates to Reasonable Accommodations for People with Disabilities	

Appendix C – Sites Inventory Form

HCD requires that all Housing Element submittals include a spreadsheet listing all sites in the site inventory with detailed information about each site. This information must be provided in HCD's format in a template provided by HCD. This template is provided in Appendix C to the Housing Element.

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1 INTRODUCTION

This document is the Housing Element for the City of Millbrae (City or Millbrae) as updated for the 2023–2031 6th Cycle Planning Period. The Housing Element is part of the Millbrae General Plan (General Plan), currently undergoing its latest update. The General Plan Update process started in 2015 as a comprehensive update to the existing General Plan, along with the preparation of a specific plan, and the related program Environmental Impact Report for California Environmental Quality Act (CEQA) compliance. The Millbrae General Plan will establish the vision of planning and land use for Millbrae until 2040.

The guiding principle for a healthy community in the City's General Plan states:

> *"Encourage healthy lifestyles for all residents and visitors by increasing opportunities for physical activity, availability of nutritious foods, quality education, realistic living wages, access to affordable healthcare and childcare,* ***options for affordable housing****, clean air and water, and a safe environment that promotes walking and biking."*

The California Government Code requires that a Housing Element be included in a city's General Plan as one of seven mandatory elements that express the community's values, goals, and vision for the future. This Housing Element (Housing Element Update, Housing Element or HEU throughout the document) identifies and analyzes the City's existing and projected housing needs and contains a detailed outline and work program of the City's goals, policies, quantified objectives, and programs for the preservation, improvement, and development of housing for a sustainable future. This Housing Element identifies ways in which the housing needs of all economic segments of the community, including residents and the local workforce, can be met. The overall goal of this Housing Element is to provide safe and decent housing for all economic segments of the community.

1.1 Background

The provision of adequate housing for families and individuals of all economic levels is an important public goal of the City. It has been a focus for the State of California (State or California) and local governments and has grown in complexity due to rising land and construction costs and increasing competition for physical and financial resources in both the public and private sectors.

In response to this concern, the California Legislature amended the California Government Code in 1980. The amendment instituted the requirement that each local community include a specific analysis of its housing needs and a realistic set of programs designed to meet those needs. This

analysis is to be set forth in a Housing Element and incorporated into the General Plan of each municipality.

The California Legislature determined that a primary housing goal for the State is to ensure that every resident has a decent home and suitable living environment. The requirements of the law are in California Government Code, Section 65580:

a. The availability of housing is of vital Statewide importance, and the early attainment of decent housing and a suitable living environment for every Californian, including farmworkers, is a priority of the highest order.

b. The early attainment of this goal requires cooperative participation of government and the private sector in an effort to expand housing opportunities and accommodate the housing needs of Californians of all economic levels.

c. The provision of housing affordable to low- and moderate-income households requires the cooperation of all levels of government.

d. Local and State governments have a responsibility to use the powers vested in them to facilitate the improvement and development of housing to make adequate provision for the housing needs of all economic segments of the community.

e. The California Legislature recognizes that in fulfilling this responsibility, each local government also has the responsibility to consider economic, environmental, and fiscal factors and community goals set forth in the General Plan and to cooperate with other local governments and the State in addressing regional housing needs.

f. Designating and maintaining a supply of land and adequate sites suitable, feasible, and available for the development of housing sufficient to meet the locality's housing need for all income levels is essential to achieving the State's housing goals and the purposes of this article.

California Government Code, Section 65588, requires that local governments review and revise the Housing Element of their comprehensive General Plans (e.g., Millbrae General Plan) no less than once every eight years. Before the 6th Cycle Housing Element Update for the 2023–2031 Planning Period, Millbrae's Housing Element was updated in 2015 for the 5th Cycle (2015–2023).

Multiple changes to California Housing Element law have become effective since the processing of the City's 5th Cycle Housing Element. In particular, the State increased its ability to enforce Housing Element requirements and the ability for interested people to challenge the City's compliance with Housing Element law. Pursuant to California Government Code, Section 65585, the State has a greater range of penalties that can be imposed on jurisdictions for non-compliance. Cities that do not comply with the Housing Element law may be at risk of exposure

to a variety of fiscal impacts and regulatory impacts that could reduce local control over housing-related decision-making. Jurisdictions that do not comply also risk the State imposing a more frequent Housing Element update cycle (i.e., every four years).

The 6th Cycle Housing Element Update was prepared to comply with State housing laws, as amended, and Federal, State, and local requirements as necessary to demonstrate compliance with State law and to gain State certification.

1.2 Context for Housing Planning

1.2.1 Location and Proximity to Public Transportation

The City of Millbrae was incorporated in 1948. It is a 3.25 square mile city located on the San Francisco Peninsula, approximately 15 miles south of San Francisco, and approximately 30 miles north of San Jose via Highway 101. As shown in Figure 1-1, City of Millbrae Boundary and Sphere of Influence, the City is bordered by the San Francisco International Airport (SFO), San Bruno to the northwest, Burlingame to the southeast, and the San Andreas Lake and Interstate 280 to the West.

One of Millbrae's greatest assets is its connectivity and position as the transportation hub for the Bay Area, providing connections to SFO, U.S. Highway 101, Interstate 280, and State Route 82 (El Camino Real). The Millbrae Station is the transit gateway connecting Bay Area Rapid Transit (BART), Caltrain, and SamTrans, and is the only proposed station between San Jose and San Francisco for High-Speed Rail. Additionally, Millbrae is a 40-minute drive from the Port of Oakland, which is the fifth busiest container port in the U.S. The many visitors passing through Millbrae to access SFO, the Millbrae Station, and regional transportation corridors provide many economic opportunities, such as expanding hospitality and entertainment opportunities, developing a new life sciences hub in the station area, investing in public facilities to support economic growth, and strengthening the City's image to attract visitors and the business community while serving the range of resident needs.

1.2.2 Land Use and Built Environment

Millbrae's current land use pattern is a result of more than a century of change from a large ranch to a fully developed city. Residential neighborhoods in the City primarily contain well-maintained single-family homes on 5,000-square-foot lots. Most larger lots and homes are in the hillside areas. Commercial development is concentrated along El Camino Real, Broadway, Millbrae Avenue, and in the vicinity of Millbrae Station. A light industrial area, transitioning to life science and office uses, is located south of Adrian Road.

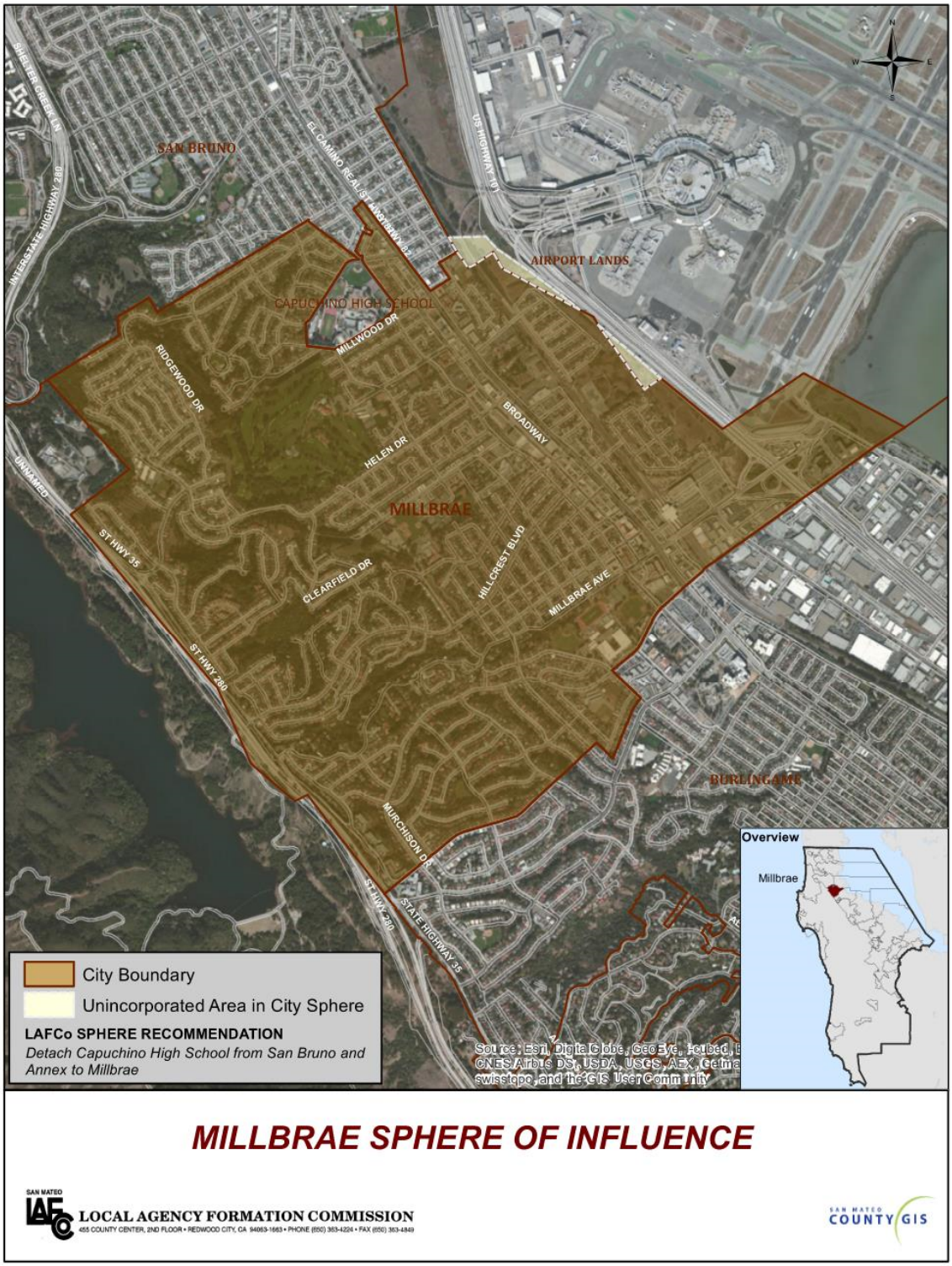
The City of Millbrae is ushering a wave of higher-density mixed-use and life sciences development around the Millbrae Station through the implementation of the Millbrae Station Area Specific Plan (MSASP) and along El Camino Real. **Furthermore, the City released the Public Review Draft Downtown and El Camino Real Specific Plan (Specific Plan) for public review on June 16, 2022, and anticipates adoption of the plan by the end of 2022.**

The Specific Plan is meant to enhance the quality of life by providing a roadmap for future growth that emphasizes transit-oriented, mixed-use development that provides a mix of housing, restaurants, general commercial, hotels, offices, and entertainment uses. In addition, the Specific Plan maximizes the development potential of vacant and underutilized parcels, and planning for well-scaled higher-density development, balanced with adequate community amenities, and mobility choices. The Specific Plan also includes the following goal, along with its corresponding policies related to housing:

- **Housing Goal:** Encourage a wide range of affordable housing and accessible housing near transit.
    - **H-1:** Affordable housing requirement for residential development projects
    - **H-2:** Affordable housing commercial linkage impact fee
    - **H-3:** Relocation assistance

As mentioned above, the Specific Plan is expected to be adopted by the end of 2022 (before the anticipated certification of this Housing Element in 2023). However, the City opted for a conservative approach by preparing this Housing Element with an analysis of constraints and opportunities for development in the City with both its existing policies, zoning, etc., and those proposed by the Specific Plan. In addition, City has included the adoption of the Specific Plan as Program HIP-16, Downtown and El Camino Real Specific Plan Adoption and Implementation, of this Housing Element (as detailed in Chapter 8, Housing Plan).

Figure 1-1. City of Millbrae Boundary and Sphere of Influence



Source: Local Agency Formation Commission

1.3 Role and Content of Housing Element and Relationship to General Plan

1.3.1 Legal Requirements

California Government Code, Section 65300.5, states the following: "The General Plan and elements and parts thereof comprise an integrated, internally consistent, and compatible statement of policies…" The purpose of requiring internal consistency is to avoid policy conflict and provide a clear policy guide for the future maintenance, improvement, and development of housing in the City.

The Housing Element was prepared in a manner to ensure consistency with the other elements of the General Plan, which include the Land Use and Built Environment Element; Mobility and Circulation Element; Economic Development Element; Recreation, Arts, and Culture Element; Natural Resource Conservation Element; and Health, Safety, and Quality of Life Element. As part of the Millbrae General Plan, the Housing Element establishes housing-related actionable programs intended to guide decision-making related to land use planning and development activities for the 2023–2031 6th Cycle Planning Period in accordance with the City's stated housing goals and State law.

California Government Code, Section 65583, contains requirements for Housing Elements, including the provision of an inventory of sites that meet specific criteria regarding zoning, lot sizes, and other factors. It is important to note that the general purpose of this site inventory is to provide the planning and zoning framework that identifies sites suitable for residential development. However, cities and counties do not build housing units – developers do. This Housing Element describes how the planning framework and actions within the control of the City will be established and conducted, but the Housing Element is not an approval of residential projects nor is it a guarantee, requirement, or commitment of development.

The Housing Element includes strategies for the maintenance of existing housing and action-oriented programs to increase the capacity for additional housing options within the local housing supply, as necessary, to meet the current and future needs of people living and working in Millbrae. Implementation of these strategies will require that the City process a series of future actions, referred to as the "Housing Plan," for compliance with California housing laws.

Table 1-1, Housing-Related Goals by Element, demonstrates the consistency between the Housing Element goals and related goals in other General Plan elements.

All future General Plan amendments will be reviewed for consistency with the Housing Element to ensure that housing goals are implemented. The City will continue to review and revise the Housing Element, as necessary, to maintain internal consistency when amendments to the General Plan are made.

Table 1-1. Housing-Related Goals by Element

Housing Element Goals	Related Goals – General Plan[1]
H-1: Reinforce the City's Commitment to Meeting Housing Needs	**1998 General Plan - Land Use Goals** • **LU-3:** Maintain a Variety of Land Uses **2040 General Plan - Land Use and Built Environment Goals** • **LU-2:** Support a variety of housing opportunities and improve access to housing for all community members. **2040 General Plan – Mobility and Circulation Goals** • **M-6:** Develop balanced housing and employment opportunities to reduce vehicle miles traveled. **2040 General Plan – Natural Resource Conservation Goals** • **NRC-4:** Reduce emissions of criteria air pollutants and reduce exposure to toxic air contaminants and fine particulate matter to improve regional air quality and protect the health of Millbrae residents. • **NCR-7:** Strengthen efforts to reduce greenhouse gas emissions from local sources to combat global climate change. **2040 General Plan – Health, Safety, and Hazardous Material Goals** • **HSHM-3:** Improve the sustainability and resiliency of the City through continued efforts to reduce the causes of and adapt to climate change.

[1] The City is in the process of adopting its 2040 General Plan. The Public Review Draft of the General Plan was released on June 14, 2022, for public review and is estimated to be adopted by the end of 2022.

Housing Element Goals	Related Goals – General Plan[1]
H-2: Protect and Enhance Existing Housing, Community Character, and Resources	**1998 General Plan - Land Use Goals** • **LU-1:** Preserve the Quality of Residential Neighborhoods • **LU-2:** Promote Proper Site Planning, Architectural Design, and Property Maintenance • **LU-5:** Provide Adequate Services and Facilities **2040 General Plan - Land Use and Built Environment Goals** • **LU-11:** Ensure that all land use decisions benefit Millbrae residents equally and do not create a disproportionate burden to any resident based on location, income, race/ethnicity, educational status, or national origin.
H-3: Provide New Housing and Address Affordable Housing and Other Special Needs	**2040 General Plan - Land Use Goals** • **LU-2:** Support a variety of housing opportunities and improve access to housing for all community members. • **LU-11:** Ensure that all land use decisions benefit Millbrae residents equally and do not create a disproportionate burden to any resident based on location, income, race/ethnicity, educational status, or national origin.
H-4: Equal Access to Housing/Housing Mobility	**2040 General Plan - Land Use and Built Environment Goals** • **LU-2:** Support a variety of housing opportunities and improve access to housing for all community members. • **LU-10:** Ensure the adequate provision of safe and reliable public infrastructure and facilities to meet the City's current and future needs. • **LU-12:** Ensure all residents have equal access to healthy foods, education, green spaces, and medical services.

1.4 Regional Housing Needs Allocation (RHNA)

The State of California and the Association of Bay Area Governments (ABAG) conduct a process to establish quantitative "fair share housing" allocations for the creation of housing units, including affordable units under various income categories. These quantified numbers are known as the Regional Housing Needs Allocation (RHNA). The RHNA for the City of Millbrae is listed in Table 1-2, 2023-2031 Regional Housing Needs Allocation, for the identified income categories.

Table 1-2. 2023-2031 Regional Housing Needs Allocation

	Totals by Numbers of Units	Very Low (<=50% AMI)	Low-Income (51-80% AMI)	Moderate (81-120% AMI)	Above Moderate (>120% AMI)
2023-2031 RHNA	2,199	575	331	361	932
Percentage of Total	100%	26%	15%	17%	42%

Source: *Association of Bay Area Governments*

1.5 Public Outreach and Participation

With the Housing Element serving as an important document that will shape the future of Millbrae, the City believes it is important that it reflects the vision of the people who make Millbrae special. To accomplish this, Millbrae developed a broad and diverse outreach plan designed to reach as many community stakeholders as possible across all socio-economic levels who live and work in the City. In order to ensure maximum participation by stakeholders in every economic segment of the community, the City completed the following steps to provide a comprehensive and transparent community engagement and participation process (a complete administrative record of all public outreach and participation actions is provided in Appendix A of this Housing Element):

- Regional community outreach – 21 Elements, a collaboration of all 21 San Mateo County (San Mateo County or County) jurisdictions, held a four-part webinar series from October 13, 2021, through December 1, 2021, titled *Creating a More Affordable Future* to help educate residents on regional and local housing issues. Topics for discussion included why affordability matters, housing and racial equity, housing in a climate of change, and putting it all together for a better future. The City advertised this webinar series via the City's website, social media, and announcements during Planning Commission meetings.

In addition to the webinar series, 21 Elements also conducted a Countywide resident survey providing a unique picture of the housing choices, challenges, needs, and access to economic opportunities of San Mateo County residents. The survey was made available online in both English and Spanish formats, running from December 3, 2021, to March 15, 2022, and gathered 2,382 resident responses.

- The City provided a comprehensive online survey (with 34 questions) to the community between June 16 and August 3, 2022. The survey solicited input from community stakeholders on fair housing issues, housing needs, existing conditions, and suggested programs and actions. There were 62 respondents to the survey.
- A community workshop was held on June 30, 2022. Approximately eight community members, in addition to City staff and the City's Housing Element Consultants (Harris & Associates) attended the workshop, which included live polling and a question and answer/comment session at the end. During the workshop, the City discussed the Housing Element Update, provided preliminary information on community housing needs and potential sites, and gathered community feedback. The workshop was advertised on the City's Calendar, dedicated Housing Element Update webpage, through posts on the City's social media accounts and announced at Planning Commission and City Council meetings. A lack of affordable housing choices in the City was a common theme during the polling and during the question and answer/comment portion of the workshops. Following the workshop, the City made both the recording of the meeting and presentation slides available on the City's Planning Division Housing Element Update webpage.
- Three stakeholder meetings to obtain additional qualitative data from affordable and market-rate housing developers, local community advocates, and fair housing providers. The stakeholder meetings discussed strategies to encourage the development of affordable housing in Millbrae. Special invitations were sent to, and stakeholder meetings conducted with, the following parties:
    - Several market rate developers active in the region (including Greystar, Muzzi Developments, Summerhill Apartment Communities, and Trammell Crow).
    - Housing advocates and service providers (including Project Sentinel and Center of Independence of Individuals with Disabilities).
    - Several affordable housing developers active in the region (including Housing Choices, Habitat for Humanity – Greater SF, and The Core Companies).
- The Draft Housing Element Update was publicly available online at www.ci.millbrae.ca.us/HEU. The City notified the community of the availability of the Housing Element Update by September 9, 2022.

- The Draft Housing Element Update was publicly available between September 9, 2022, and October 9, 2022, exceeding the required 30-day period prior to HCD submittal.

Appendix A includes a comprehensive administrative record of the public participation and engagement process, including notices, survey results, webpage content, social media posts, presentations, correspondence with stakeholders, and polls.

1.6 Housing Accomplishments

Millbrae recognizes the importance of providing safe and affordable housing for residents of all income levels. In order to support housing development and increase access to safe and affordable housing for its residents, the City has adopted the following ordinances:

- Inclusionary Housing Ordinance in 2021 requiring that a minimum of 15% of all housing units in developments of 10 or more units in the City be made affordable to very low-, low-, or moderate-income households, depending on unit type and affordability level, and allow for a minimum density bonus of 20% per state law.
- Commercial Linkage Fee Ordinance in 2021 imposing a $3,868 per hotel room fee on new hotel rooms, $5.80 per square foot on new retail, and $12.86 per square foot on office space. This fee helps mitigate the need for affordable housing created by the workforce of those new developments.
- Density Bonus Ordinance in 2015 providing increased density for the production of affordable housing. In addition to the density bonus, the City also provides other concessions, such as changes in setbacks, height, and parking spaces.
- Reasonable Accommodation Ordinance in 2015 to provide individuals with disabilities reasonable accommodation in regulations, policies, practices, and procedures to ensure equal access to housing and to facilitate the development of housing for individuals with disabilities.
- Housing Development the City added 314 above-moderate housing units during the 5th RHNA cycle, exceeding the 5th Cycle RHNA housing production goal of 257 units.

As shown inTable 1-3, the 2015-2023 RHNA Progress – Permitted Units, these actions resulted in the development of over 147 affordable housing units during the 5th Cycle Planning Period (2015-2023). While Millbrae made progress towards its RHNA during the 5th Cycle Planning Period, the City acknowledges the need for an increased effort to encourage the development of more units affordable to lower-income households, especially considering the significant reduction in federal, state, and local affordable housing funding sources as follows:

- Federal affordable housing funds have decreased up to 60% in the last 15 years.
- In recent years, state grants and other funding sources have prioritized housing solutions for unhoused individuals and families. Prior to 2015, a larger share of available state funding was focused on very low-, low-, and moderate-income affordable housing.
- When the State abolished Redevelopment in 2011–2012, an estimated $2 billion annually (statewide) was lost.

Table 1-3. 2015-2023 RHNA Progress - Permitted Units

	Totals by Numbers of Units	Very Low (<=50% AMI)	Low-Income (51-80% AMI)	Moderate (81-120% AMI)	Above Moderate (>120% AMI)
2015-2023 RHNA	663	193	101	112	257
Units Permitted	447	41	70	36	314
Remaining RHNA	259	152	31	76	0

Source: *Millbrae 2021 Housing Element Annual Progress Report*

1.7 Affordable Housing Need

Meeting the community's housing needs is a high priority for the City. As widely reported throughout the State, California is in the midst of a housing crisis where demand greatly outweighs supply. Additionally, overall wage growth has not kept pace with increases in housing costs, making median home prices and rents out of reach for a large population within the State. According to the Joint Center for Housing Studies at Harvard University,[2] renters in California have to earn 120% or more of the area median income to afford a median-priced home. This severe spending on housing costs has contributed significantly to various housing problems, such as a lack of affordability and homelessness.

According to the 2015–2019 American Community Survey (ACS) 5-Year Data, the number of cost-burdened households in the City is similar to the County and Bay Area average. Millbrae is primarily made up of ownership households - according to the 2015–2019 ACS 5-Year Data, roughly 36% of the households in the City are renter-occupied and 64% are owner-occupied. Homeowners, while slightly better off than renters in terms of the percentage of cost-burdened households, are still considerably cost-burdened. Specifically, 34% of owner-occupied

[2] Joint Center for Housing Studies of Harvard University. 2021. The State of the Nation's Housing. Accessed May 2022. https://www.jchs.harvard.edu/sites/default/files/reports/files/Harvard_JCHS_State_Nations_Housing_2021.pdf.

households are cost-burdened, including 16% who are severely cost-burdened (as detailed in Chapter 2, Community Profile and Housing Needs Assessment).

While the majority of households are owner-occupied, renter-occupied households in Millbrae represent a significant portion of households in the City and will likely continue to grow with future population growth. Renters have higher percentages of cost-burdened households. Particularly, 41% of renter-occupied households in Millbrae are cost-burdened, including 22% who are severely cost-burdened (as detailed in Chapter 2, Community Profile and Housing Needs Assessment).

Housing cost burden, in addition to the consistently growing population in California, has made it necessary for cities to plan for more housing units. As a result, Millbrae is expected to plan for 2,199 units in the 6th Cycle Housing Element, of which 1,267 need to be planned for very low, low- and moderate-income households (as shown in Table 1-2 in this section).

1.8 Affordable Housing Challenges

State law recognizes that housing needs may (and do) exceed available resources and, therefore, does not require that the City's quantified objectives be identical to the identified housing needs. More specifically, California Government Code, Section 65583(b)(2), states the following:

> *It is recognized that the total housing needs . . . may exceed available resources and the community's ability to satisfy this need within the content of the general plan requirements. Under these circumstances, the quantified objectives need not be identical to the total housing needs. The quantified objectives shall establish the maximum number of housing units by income category, including extremely low-income that can be constructed, rehabilitated, and conserved.*

Acknowledgment of funding limitations is extremely important—cities and counties are required to prepare Housing Elements every eight years to identify needs and actions to provide for housing at all income levels and for all populations despite a *severe* shortage in local, State, and Federal funding that makes many of the actions financially infeasible. It is important to recognize that state law requires cities to plan for housing, but almost all housing is developed by the private sector.

Developers, not cities or counties, usually build housing. The role of local government is to *facilitate* housing development through the planning process. Nearly all cities and counties in the State have shown higher numbers of market-rate units, or housing units for above moderate-income households, versus affordable units in their annual Housing Element progress reports. This is generally because revenues derived from selling or renting market-rate housing exceed the cost to develop the units, resulting in a profit. For-profit developers are businesses that, just like other businesses, do not move forward with production if the price they can command is less

than the cost to produce the item or commodity. In this case, the item is a unit of housing. Additionally, developers often require investors to provide financial assistance, and these investors require a minimum rate of return to participate. While affordable housing and nonprofit housing developers do exist, these organizations will not move forward with a project unless it is financially feasible (i.e., revenues cover costs without a profit margin).

Affordable housing projects are generally more expensive to develop due to State laws and funding program requirements. For example, affordable housing projects that receive any Federal, State, and/or local public subsidies are required to pay prevailing wages on the construction of a project. Prevailing wages can add 13–25% to construction costs. In addition, Federal and State funding sources require sustainability practices, which are beneficial and important but can lead to higher costs for the development of a project. When these higher costs are combined with high land, construction, and materials costs in California, the development of affordable housing requires public subsidies and assistance because the costs to develop the housing far exceed the revenues derived from selling and renting the housing at affordable prices and rents.

Affordable housing is funded through a combination of sources (because no one source is sufficient to fund individual projects), including Low-Income Housing Tax Credits (LIHTCs), State grants, project-based housing vouchers from the U.S. Department of Housing and Urban Development (HUD), loan programs, donation of land, and other sources. Affordable projects can require up to 10 separate funding sources with different requirements and deadlines, adding to the complexity and feasibility of these projects.

It is worth noting that sufficient public funding is not available to fill the gap between what it costs to build affordable housing and the revenues generated by the housing on a state and federal level. Before 2011, over 400 cities in California (like Millbrae) used redevelopment as a financial tool to revitalize blighted areas and to fund affordable housing. However, redevelopment was eliminated in 2011–2012, and this significant funding source (estimated at $2 billion/year Statewide) of locally derived revenues was redirected away from affordable housing and toward local taxing entities' general funds.

Despite considerable funding challenges, the City has successfully provided funding assistance to several affordable housing developments during the last eight years, but the number of projects assisted is much lower than it would have been if federal, state, and local funding had not been reduced or eliminated in such a significant way.

1.9 Organization

This Housing Element is organized into the following chapters:

- **Chapter 1, Introduction:** Provides an overview of the purpose, scope, and organization of the Housing Element.

- **Chapter 2, Community Profile and Housing Needs Assessment:** Provides a summary of the City's demographic and housing characteristics, special needs groups, and housing needs.
- **Chapter 3, Housing Constraints:** Provides an assessment of the various constraints to housing development and preservation.
- **Chapter 4, Housing Resources and Opportunities:** Provides an inventory of resources available to meet the City's existing and projected housing needs.
- **Chapter 5, Review of Previous Housing Element (2015–2023):** Provides an assessment of progress during the 2015–2023 5th Cycle Planning Period for the Housing Element, including program status, objectives, actions, and appropriateness.
- **Chapter 6, At-Risk Affordable Housing:** Provides information on existing affordable units at risk of converting to market rate and a preservation analysis.
- **Chapter 7, Adequate Sites Inventory Analysis and Methodology:** Provides a detailed description of the methodology used to identify specific housing sites (by Assessor's Parcel Number), the number of units for each site, the level of affordability for each site, and the methodology used to ensure that each site meets State law requirements.
- **Chapter 8, Housing Plan:** Outlines the City's goals, policies, programs, and actions to provide and preserve housing opportunities in the community and quantified objectives for the 2023–2031 6th Cycle Planning Period. The following appendices provide additional information and data pursuant to legal requirements:
    - **Appendix A:** Public Engagement
    - **Appendix B:** Affirmatively Furthering Fair Housing Analysis
    - **Appendix C:** Sites Inventory Form

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2 COMMUNITY PROFILE AND HOUSING NEEDS ASSESSMENT

California Government Code, Section 65583(a), requires an assessment of housing needs and an inventory of resources and constraints relevant to the meeting of these needs. Per California Government Code, Section 65583(a)(1), this chapter provides a community profile and details the population characteristics and growth, demographics, and employment trends in the City of Millbrae (City or Millbrae). These trends influence the housing needs of a community and, thus, are important factors in evaluating the housing needs of Millbrae's residents and identifying strategies to meet those needs through plans, programs, and projects.

The primary data sources used in this chapter include the following:

- The Association of Bay Area Governments (ABAG) Housing Needs Data (ABAG Housing Needs Data). ABAG collaborated with the California Department of Housing and Community Development (HCD) and developed a housing needs data package for each local jurisdiction that has been certified by HCD for use in the 6th Cycle Housing Element.
- State Department of Finance Population and Housing Estimates.
- U.S. Census Bureau, Census 2000.
- American Community Survey (ACS) 5-Year Data (2015–2019).

2.1 Background

Millbrae was incorporated in 1948. It is a 3.25 square mile city located on the San Francisco Peninsula, approximately 15 miles south of central San Francisco, and approximately 30 miles north of San Jose via Highway 101. The City is bordered by the San Francisco International Airport, San Bruno to the northwest, Burlingame to the southeast, and the San Andreas Lake and Interstate 280 to the west.

Millbrae is positioned as the transportation hub for the Bay Area. It provides convenient connections to San Francisco International Airport, U.S. Highway 101, Interstate 280, and State Route 82 (El Camino Real). The Millbrae Station is the transit gateway connecting Bay Area Rapid Transit, Caltrain, and SamTrans, and is the only proposed station on the Peninsula for High-Speed Rail. Additionally, Millbrae is a 40-minute drive from the Port of Oakland, which is the fifth busiest container port in the U.S. The many visitors passing through Millbrae to access San Francisco International Airport, the Millbrae Station, and regional transportation corridors provide many economic opportunities, such as expanding hospitality and entertainment

opportunities, developing a new life sciences hub in the station area, investing in public facilities to support economic growth, and strengthening the City's image to attract visitors and the business community while serving the range of resident needs.

The Bay Area has seen and continues to see growth in population, households, and jobs. This growth will continue to increase the demand for various housing types and sizes to accommodate this growth. Table 2-1, Millbrae Growth Forecast 2040, illustrates the growth the City's population, households, and jobs will continue to experience into 2040, according to ABAG and the Metropolitan Transportation Commission projections (adopted July 2017).

Table 2-1. Millbrae Growth Forecast 2040

	2015	2020	2040	Annual Growth Rate
Population	22,025	22,360	27,055	0.9%
Households	8,110	8,235	9,725	0.8%
Total Jobs	6,470	6,570	11,595	3.2%

Source: *ABAG & MTC Plan Bay Area 2040 Projections.*

While the number of people drawn to the region over the past 30 years has steadily increased, housing production has stalled, contributing to the housing shortage that communities are experiencing today. In many cities, including Millbrae, this has resulted in residents being priced out, increased traffic congestion caused by longer commutes, and fewer people across all incomes being able to purchase homes or meet surging rents.

The 6th Cycle Housing Element Update provides a roadmap for how the City will meet its growth and housing challenges. Required by the State, the Housing Element identifies what the existing housing conditions and community needs are, reiterates goals, and creates a plan for more housing. This chapter of the Housing Element, Chapter 2, Community Profile and Needs Assessment, presents a snapshot of the Millbrae community.

2.2 Summary of Key Facts

- **Population –** The City's population has been growing slightly faster than San Mateo County (San Mateo County or County) with 10% growth between 2000 and 2020, compared to 9% for the County. However, it has grown at a rate below that of the Bay Area, which increased by 15% between 2000 to 2020. The increase throughout the region is mostly due to natural growth (births minus deaths) and a strong economy that draws new residents to the region.
- **Income –** Millbrae has a comparable percentage of lower-income households than the rest of the County, with 39% and 40% of households earning less than 80% of the Area

Median Income (AMI), respectively. In addition, the City has the same percentage of lower-income households as the Bay Area as a whole.

  - Poverty – Currently, people of color in the County are more likely to experience poverty. The groups with the highest poverty rates in Millbrae are Black/African American residents (9.3%) and Asian/Pacific Islander residents (6.9%). On the other hand, American Indian/Alaskan Native residents have the lowest poverty rate (2.5%).

- **Age –** Millbrae residents are overall older than they were in the past. The median age increased from 41.5 in 2000 to 43 in 2019. In that year, 19% of the population was over 65, and 19% of the population was under 18 years old.
- **Race/Ethnicity –** In 2020, 33.9% of Millbrae's population was White, while 0.6% was African American, 48.8% was Asian, and 11.4% was Latinx.[1] People of color in Millbrae comprise a proportion above the overall proportion in the Bay Area as a whole.
- **Employment –** Millbrae residents most commonly work in the Health & Educational Services industry. From January 2010 to January 2021, the unemployment rate in Millbrae decreased by two percentage points. Since 2010, the number of jobs located in the jurisdiction increased by 930 (19.6%). Additionally, the jobs-household ratio in Millbrae has increased from 0.69 in 2002 to 0.7 jobs per household in 2018.
  - Unemployment – Jurisdictions in the Bay Area experienced a sharp rise in unemployment in 2020 due to impacts related to the COVID-19 pandemic, though with a general improvement and recovery in the later months of 2020. As of January 2021, Millbrae's unemployment rate was 5.9%, which was slightly lower than the regional unemployment rate of 6.6%, but much lower than its pandemic-related high rate of 11.1% in April 2020.
- **Number of Homes –** The number of new homes built in the Bay Area has not kept pace with the demand, resulting in longer commutes, increasing prices, and exacerbating issues of displacement and homelessness. The number of homes in Millbrae increased by 3.1% from 2010 to 2020, which is below the growth rate for the County and below the growth rate of the region's housing stock during this period.
- **Home Prices –** A diversity of homes at all income levels creates opportunities for all Millbrae residents to live and thrive in the community. Given high job growth and low

[1] The Census Bureau's American Community Survey accounts for ethnic origin separate from racial identity. The numbers reported here use an accounting of both, such that the racial categories are shown exclusive of Latinx status, to allow for an accounting of the Latinx population regardless of racial identity. The term Hispanic has historically been used to describe people from numerous Central American, South American, and Caribbean countries. In recent years, the term Latino or Latinx has become preferred. This report generally uses Latinx, but occasionally when discussing US Census data, we use Hispanic or Non-Hispanic, to clearly link to the data source.

housing growth in the County, the cost of housing in the City has increased significantly in the past decade:

  - Ownership – In 2020, the average sales price of a single-family home in Millbrae was approximately $1,846,240. Home prices increased by 102.7% from 2010 to 2020.
  - Rental Prices – The typical median contract rent for an apartment in Millbrae was $2,330 in 2019. Rental prices increased by 77% from 2009 to 2019. To rent an apartment at the median level without a cost burden, a household would need to make $93,320 per year.[2]

- **Housing Type –** In 2020, 62.4% of homes in Millbrae were single-family detached, 3.4% were single-family attached, 3.3% were small multifamily (2-4 units), and 30.5% were medium or large multifamily (5+ units). Between 2010 and 2020, the number of multifamily units increased more than single-family units. Moreover, Millbrae's housing consists of more detached single-family homes than the region as a whole (62% compared to 52% in the Bay Area).
- **Cost Burden –** The U.S. Department of Housing and Urban Development (HUD) 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 Millbrae, 17% of households spend 30%-50% of their income on housing, while 18% of households are severely cost-burdened and use the majority of their income for housing.
- **Displacement/Gentrification –** According to research from The University of California, Berkeley, no households in Millbrae live in neighborhoods that are susceptible to or experiencing displacement or in areas at risk of or undergoing gentrification. 51.1% of households in Millbrae live in neighborhoods where low-income households are likely excluded due to prohibitive housing costs. There are various ways to address displacement including ensuring new housing at all income levels is built.
- **Neighborhood –** 100% of residents in Millbrae live in neighborhoods identified as "Highest Resource" or "High Resource" areas by State-commissioned research, while 0% of residents live in areas identified by this research as "Low Resource" or "High Segregation and Poverty" areas. These neighborhood designations are based on a range

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

of indicators covering areas such as education, poverty, proximity to jobs and economic opportunities, low pollution levels, and other factors.[3]

- **Special Housing Needs –** Some population groups may have special housing needs that require specific program responses, and these groups may experience barriers to accessing stable housing due to their specific housing circumstances. In Millbrae, 9.1% of residents have a disability of any kind and may require accessible housing. Additionally, 9.5% of Millbrae households are larger households with five or more people, who likely need larger housing units with three bedrooms or more. 8.7% of households are female-headed families, which are often at greater risk of housing insecurity.

2.3 Looking to the Future: Regional Housing Needs

2.3.1 Regional Housing Needs Determination

The Plan Bay Area 2050[4] Final Blueprint forecasts that the nine-county Bay Area will add 1.4 million new households between 2015 and 2050. For the eight-year time frame covered by this Housing Element Update, HCD has identified the region's housing need as 441,176 units. The total number of housing units assigned by HCD is separated into four income categories that cover housing types for all income levels, from very low-income households to market-rate housing.[5] This calculation, known as the Regional Housing Needs Determination (RHND), is based on population projections produced by the California Department of Finance as well as adjustments that incorporate the region's existing housing need.

The RHND adjustments result from recent legislation requiring HCD to apply additional adjustment factors to the baseline growth projection from the California Department of Finance, for the regions to get closer to healthy housing markets. To this end, adjustments focus on the region's vacancy rate, level of overcrowding, and the share of cost-burdened households and seek to bring the region more in line with comparable ones.[6] These new laws governing the

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[3] For more information on the "opportunity area" categories developed by HCD and the California Tax Credit Allocation Committee, see this website: https://www.treasurer.ca.gov/ctcac/opportunity.asp. The degree to which different jurisdictions and neighborhoods have access to opportunity will likely need to be analyzed as part of new Housing Element requirements related to affirmatively furthering fair housing. ABAG/MTC will be providing jurisdictions with technical assistance on this topic this summer, following the release of additional guidance from HCD.

[4] Plan Bay Area 2050 is a long-range plan charting the course for the future of the nine-county San Francisco Bay Area. It covers four key issues: the economy, the environment, housing, and transportation.

[5] HCD divides the RHND into the following four income categories:
Very Low-income: 0-50% of AMI
Low-income: 50-80% of AMI
Moderate-income: 80-120% of AMI
Above Moderate-income: 120% or more of AMI

[6] For more information on HCD's RHND calculation for the Bay Area, see this letter sent to ABAG from HCD on June 9, 2020: https://www.hcd.ca.gov/community-development/housing-element/docs/abagrhna-final060920(r).pdf

methodology for how HCD calculates the RHND resulted in a significantly higher number of housing units for which the Bay Area must plan compared to previous RHNA cycles.

2.3.2 Regional Housing Needs Allocation

A starting point for the Housing Element Update process for every California jurisdiction is the Regional Housing Needs Allocation (RHNA) – the share of the RHND assigned to each jurisdiction by ABAG. State Housing Element Law requires ABAG to develop a methodology that calculates the number of housing units assigned to each city and county and distributes each jurisdiction's housing unit allocation among four affordability levels. For this RHNA cycle, the RHND increased by 135%, from 187,990 to 441,776. For more information on the RHNA process this cycle, see ABAG's website: https://abag.ca.gov/our-work/housing/rhna-regional-housing-needs-allocation

Almost all jurisdictions in the Bay Area received a larger RHNA this cycle compared to the last cycle, primarily due to changes in State law that led to a considerably higher RHND compared to previous cycles.

In December 2021, ABAG released Final RHNA Plan San Francisco Bay Area. For Millbrae, the proposed RHNA to be planned for this cycle is 2,199 units, an increase from the last cycle. The allocation that Millbrae received from the Draft RHNA Methodology is broken down by Area Median Income (AMI) category as follows:

Table 2-2. Illustrative Regional Housing Needs Allocation

Income Group	Millbrae Units	San Mateo County Units	Bay Area Units	Millbrae Percent	San Mateo County Percent	Bay Area Percent
Very Low-Income (<50% of AMI)	575	12,196	114,442	***26.1%***	***25.6%***	***25.9%***
Low-Income (50%-80% of AMI)	331	7,023	65,892	***15.1%***	***14.7%***	***14.9%***
Moderate-Income (80%-120% of AMI)	361	7,937	72,712	***16.4%***	***16.6%***	***16.5%***
Above Moderate-Income (>120% of AMI)	932	20,531	188,130	***42.4%***	***43.1%***	***42.6%***
Total	2,199	47,687	441,176	***100%***	***100%***	***100%***

Source: *Final RHNA Plan San Francisco Bay Area December 2021.*

2.4 Population and Demographics

2.4.1 Population

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 Great Recession. Many cities in the region have experienced significant growth in jobs and population. While these trends have led to a corresponding increase in demand for housing across the region, the regional production of housing has largely not kept pace with job and population growth. Since 2000, Millbrae's population has increased by 10.2%; this rate is below that of the region as a whole, at 14.8%. In Millbrae, roughly 10.5% of its population moved during the past year, a number 3% points smaller than the regional rate of 13.4%.

Table 2-3. Population Growth Trends

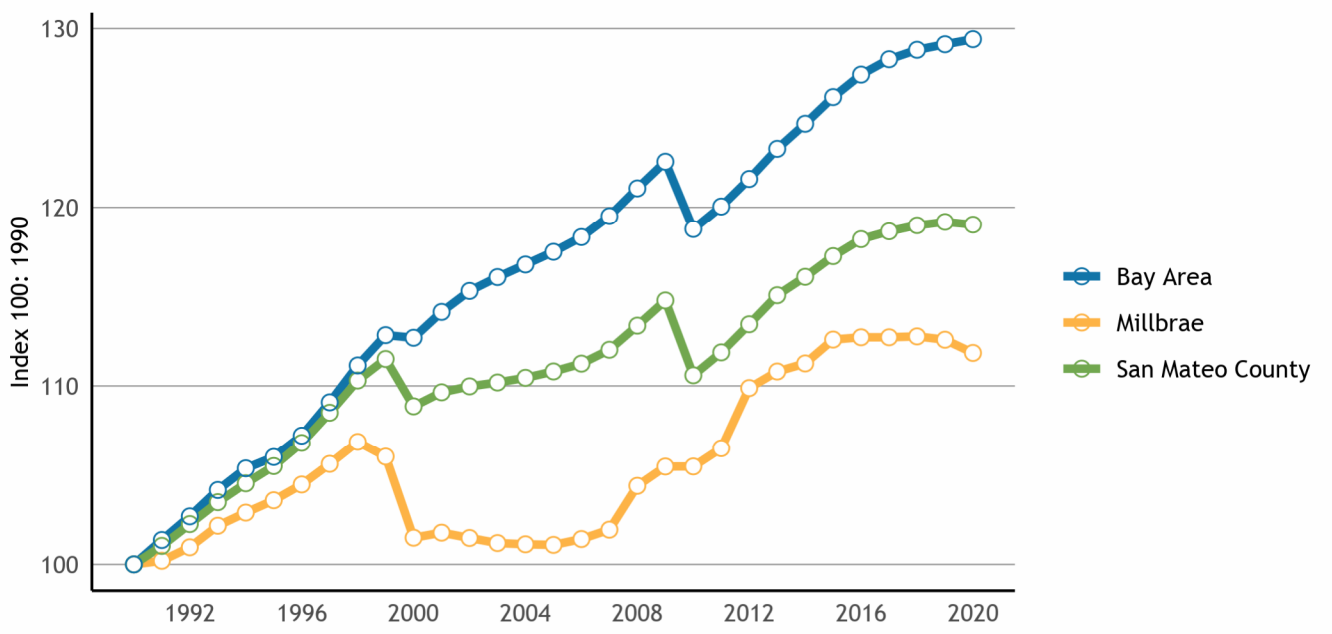
Geography	1990	1995	2000	2005	2010	2015	2020
Millbrae	20,414	21,146	20,718	20,636	21,532	22,985	22,832
San Mateo County	649,623	685,354	707,163	719,844	718,451	761,748	773,244
Bay Area	6,020,147	6,381,961	6,784,348	7,073,912	7,150,739	7,595,694	7,790,537

Source: *California Department of Finance, E-5 series. For more years of data, please refer to the Data Packet Workbook, Table POPEMP-01.*

According to DOF, Millbrae had an estimated population of 22,832 in 2020 (see Table 2-3, Population Growth Trends, and Figure 2-1, Population Growth Trends). From 1990 to 2000, the population increased by 1.5%, while it increased by 3.9% during the first decade of the 2000s. In the most recent decade, the population increased by 6%. The population of Millbrae makes up 3% of San Mateo County.[7]

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

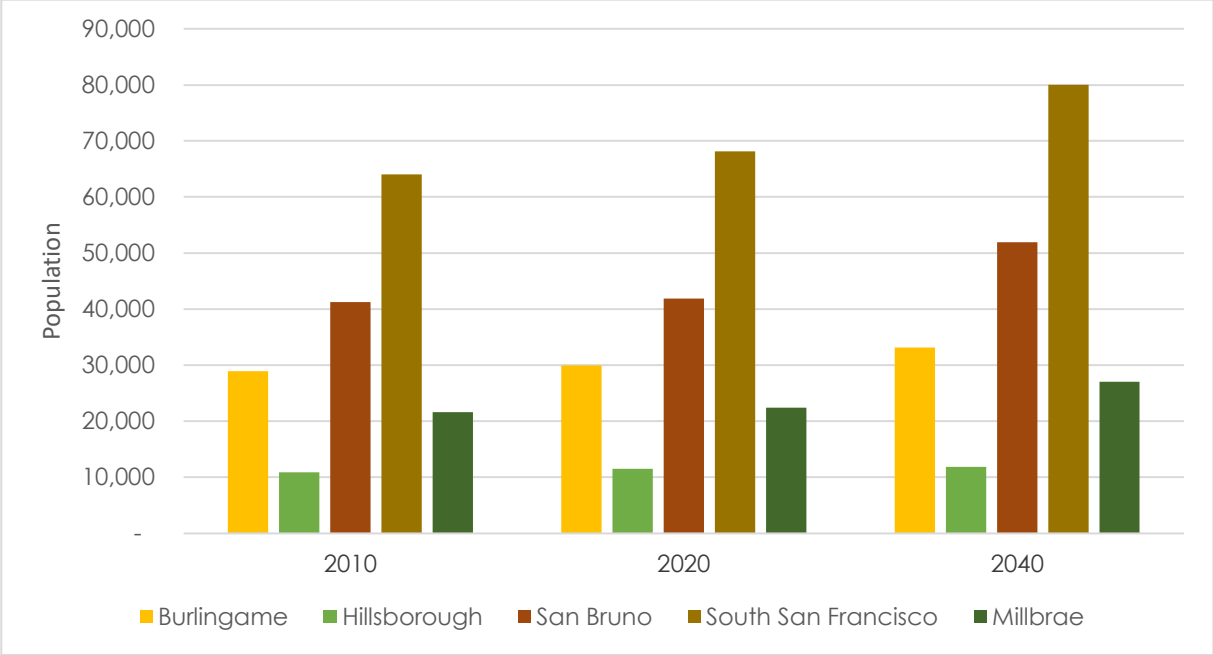
Figure 2-1. Population Growth Trends



Source: *California Department of Finance, E-5 series*
Note: *The data shown on the graph represents the population for the jurisdiction, county, and region indexed to the population in the first year shown. The data points represent the relative population growth in each of these geographies relative to their populations in that year.*

Figure 2-2, Population Trends (2010 – 2040), and Table 2-4, Population Trends in Nearby Jurisdictions, illustrate the population changes and growth rates between 2010 and 2040 for Millbrae and its neighboring cities. As shown, Millbrae is expected to experience a similar or slightly higher growth rate compared to some neighboring cities. Specifically, Millbrae is expected to grow at a 0.8% annual rate until 2040, in comparison to other cities and the County, which range between 0.3% and 0.8%.

Figure 2-2. Population Trends (2010 – 2040)



Source: *ABAG & MTC Plan Bay Area 2040 Projections*

Table 2-4. Population Trends in Nearby Jurisdictions

Jurisdiction	2010	2020	2040	Annual Growth Rate, 2010-2040
Burlingame	28,925	29,975	33,145	0.5%
Hillsborough	10,845	11,475	11,850	0.3%
San Bruno	41,240	41,895	51,920	0.8%
South San Francisco	64,005	68,105	80,015	0.7%
Millbrae	**21,610**	**22,360**	**27,055**	**0.8%**
San Mateo County	721,195	796,925	916,590	0.8%

Source: *ABAG & MTC Plan Bay Area 2040 Projections*

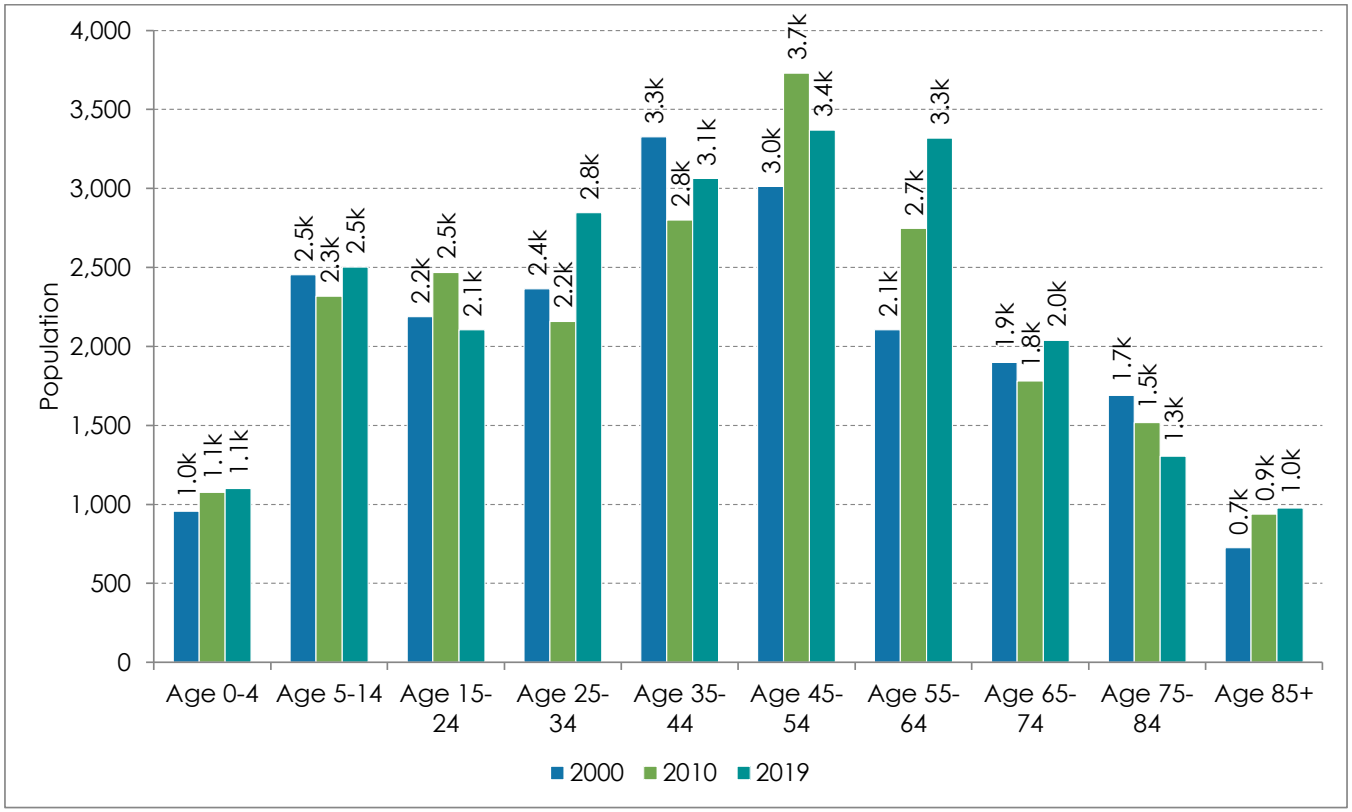
2.4.2 Age

The distribution of age groups in a city shapes what types of housing the community may need in the near 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 multifamily and accessible units are also needed.

In Millbrae, the median age in 2000 was 41.5 years; by 2019, this figure had increased, landing at around 43 years. More specifically, the population of those under 14 has increased since

2010, while the 65-and-over population has increased (see Figure 2-3. Population by Age, 2000-2019).

Figure 2-3. Population by Age, 2000-2019

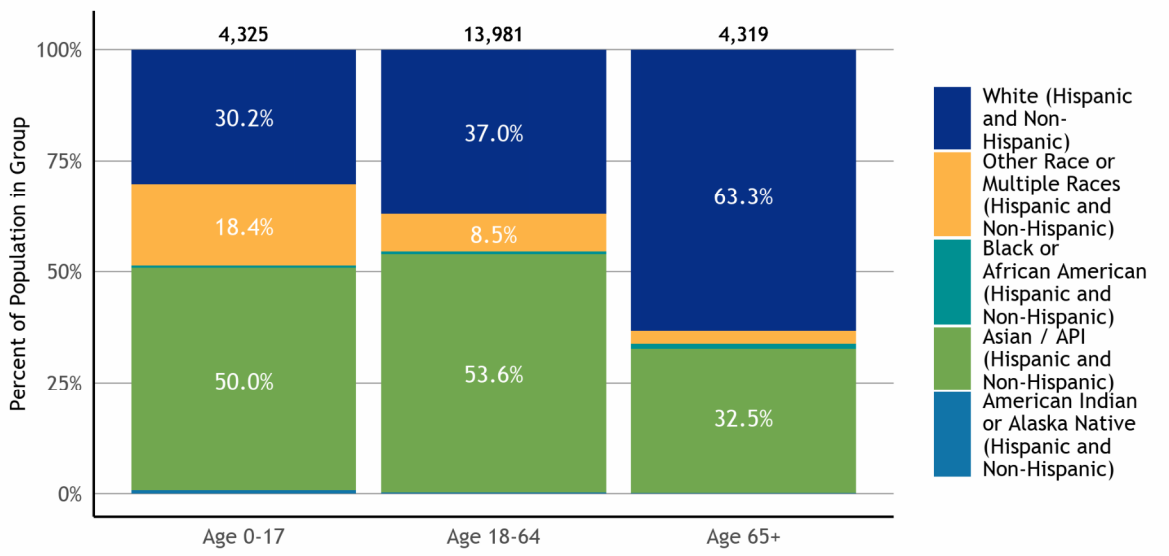


Source: *U.S. Census Bureau, Census 2000 SF1, Table P12; U.S. Census Bureau, Census 2010 SF1, Table P12; U.S. Census Bureau, ACS 5-Year Data (2015-2019), Table B01001*

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. People of color[8] make up 36.7% of seniors and 69.8% of youth under 18 (see Figure 2-4, Senior and Youth Population by Race).

[8] Here, we count all non-white racial groups.

Figure 2-4. Senior and Youth Population by Race



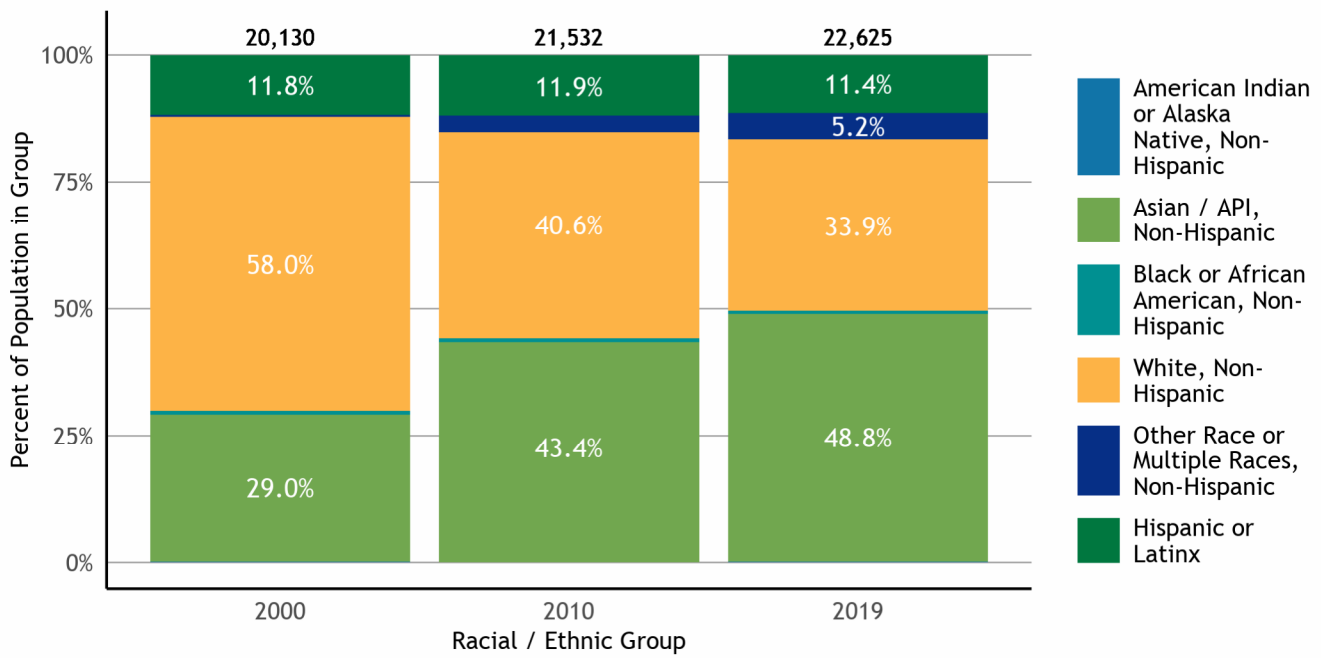
Source: *U.S. Census Bureau, ACS 5-Year Data (2015-2019), Table B01001(A-G)*
For the data table behind this figure, please refer to the Data Packet Workbook, Table SEN-02.

2.4.3 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 have occurred over time and continue to impact communities of color today.[9] Since 2000, the percentage of residents in Millbrae identifying as White has decreased – and similarly, the percentage of residents of all *other* races and ethnicities has *increased* – by 24.1%, with the 2019 population standing at 7,659 (see Figure 2-5, Population by Race, 2000-2019). In absolute terms, the *Asian / Pacific Islander, Non-Hispanic* population increased the most while the *White, Non-Hispanic* population decreased the most.

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

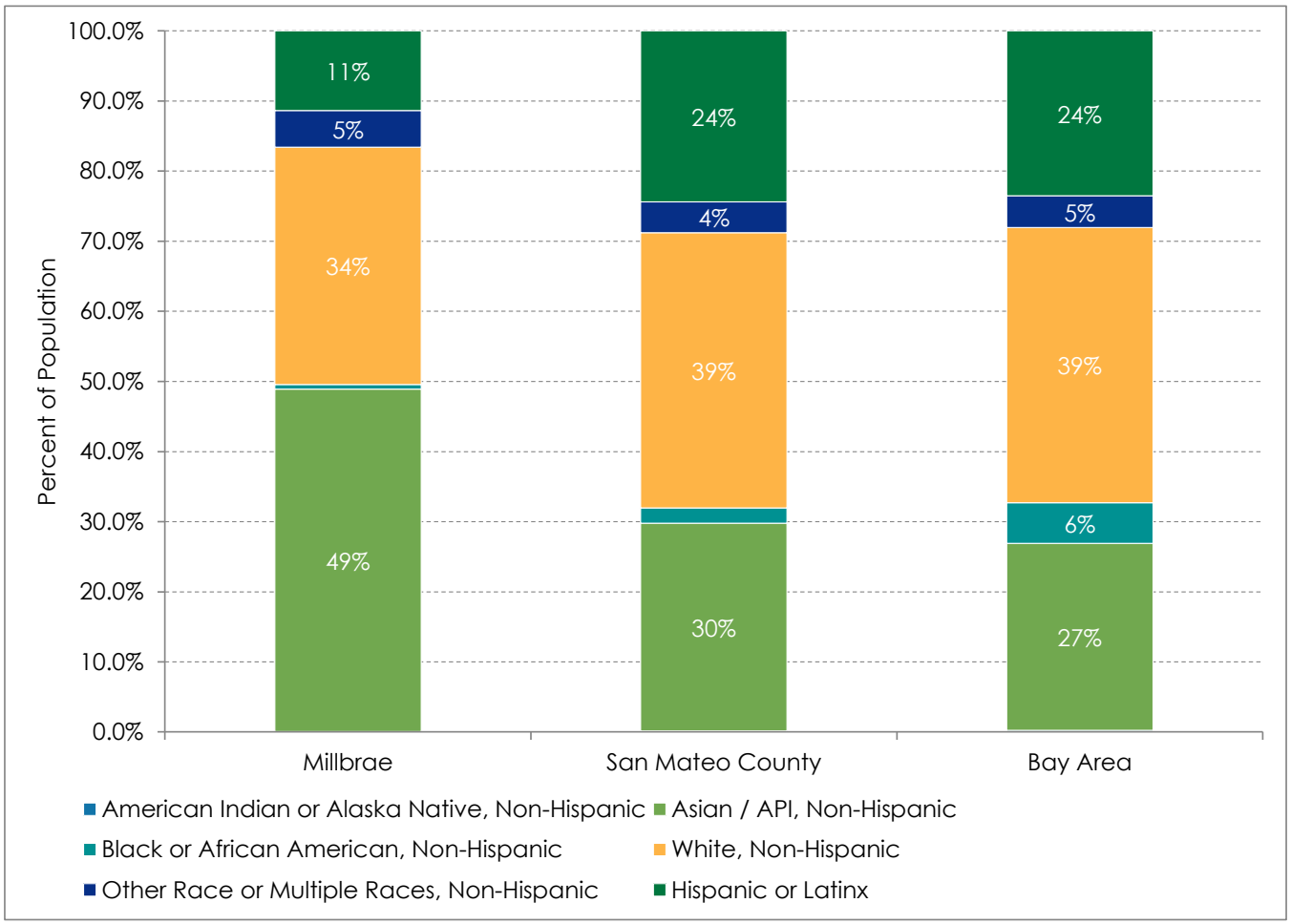
Figure 2-5. Population by Race, 2000-2019



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

Generally, Millbrae has a similar level of diversity compared to the Bay Area and the County. However, the City has a lower amount of Latinx, and Black residents compared to both the Bay Area and the County but is home to a larger percentage of Asian residents, as shown in Figure 2-6, Population by Race (County and Bay Area).

Figure 2-6. Population by Race (County and Bay Area)



Source: *U.S. Census Bureau, ACS 5-Year Data (2015-2019), Table B03002*

2.5 Employment Trends

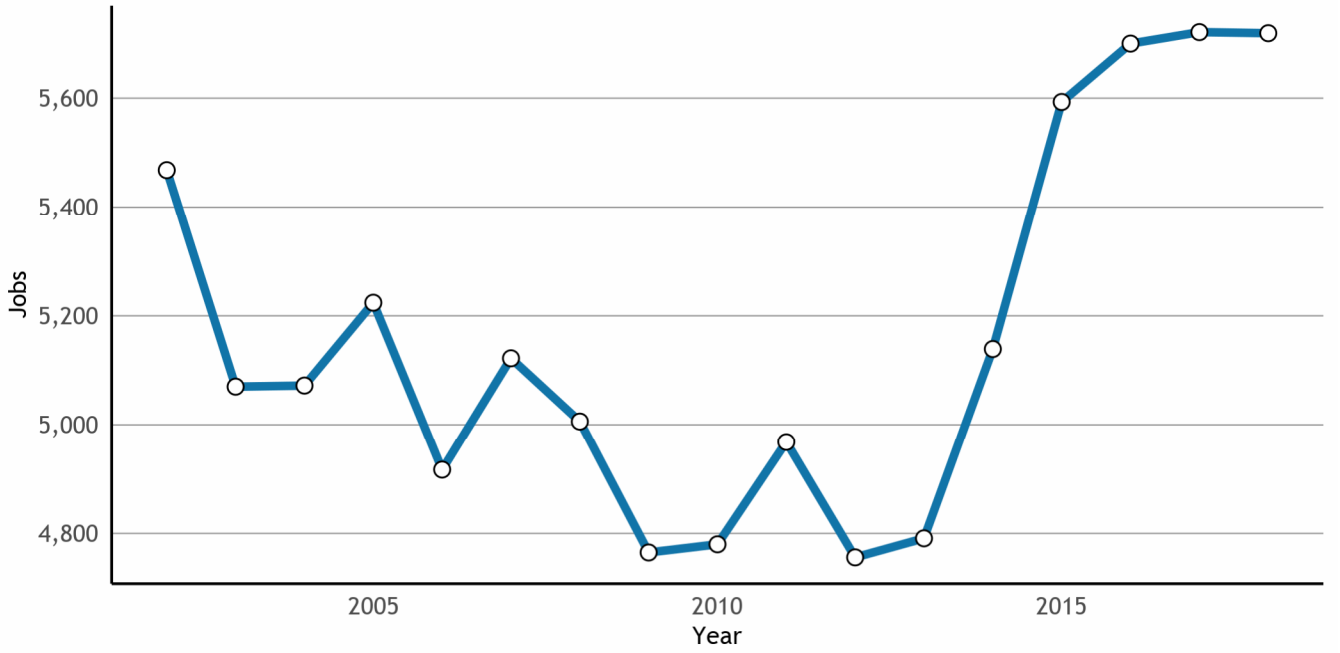
2.5.1 Balance of Jobs and Workers

A city houses employed residents who either work in the community where they live or work elsewhere in the region. Conversely, a city may have job sites that employ residents from the same city, but more often employ workers commuting from outside of it. Smaller cities typically will have more employed residents than jobs there and export workers, while larger cities tend to have a surplus of jobs and import workers. To some extent, the regional transportation system is set up for this flow of workers to the region's core job centers. At the same time, as the housing affordability crisis has illustrated, local imbalances may be severe, where local jobs and worker populations are uncoordinated at a sub-regional scale.

One measure of this is the relationship between *workers* and *jobs*. A city with a surplus of workers "exports" workers to other parts of the region, while a city with a surplus of jobs must

conversely "import" them. Between 2002 and 2018, the number of jobs in Millbrae increased by 4.6% (see Figure 2-7, Jobs in Millbrae).

Figure 2-7. Jobs in Millbrae



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

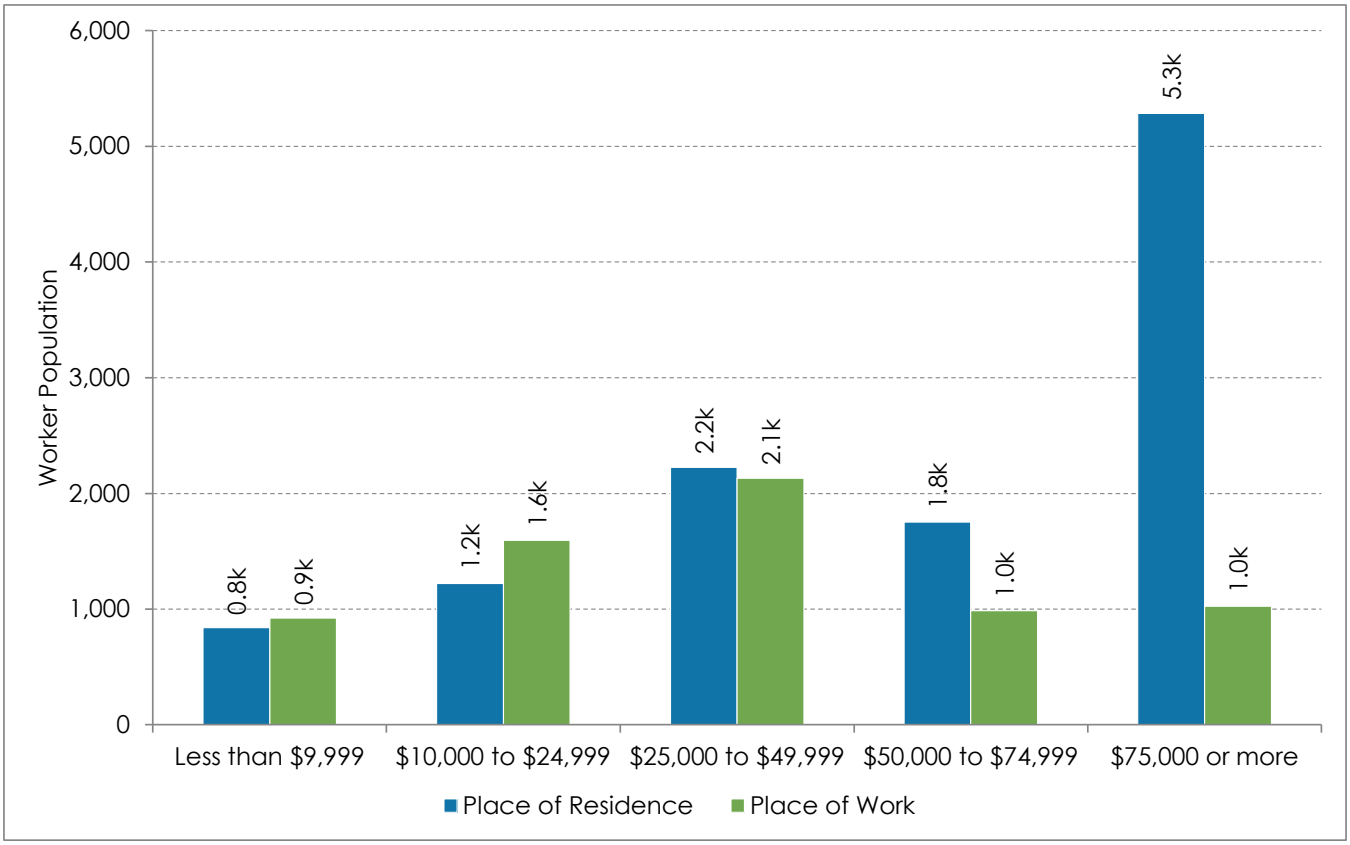
There are 11,320 employed residents and 6,657 jobs[10] in Millbrae - the ratio of jobs to resident workers is 0.59; Millbrae is *a net exporter of workers*.

Figure 2-8, Workers by Earnings, by Jurisdiction as Place of Work and Place of Residence, shows the balance when comparing jobs to workers, broken down by different wage groups, and offers additional insight into local dynamics. A community may offer employment for relatively low-income workers but have relatively few housing options for those workers - or conversely, it may house residents who are low-wage workers but offer few employment opportunities for them. Such relationships may cast extra light on potentially pent-up demand for housing in particular price categories. A relative *surplus* of jobs relative to residents in a given wage category suggests the need to import those workers, while conversely, surpluses of workers in a wage group relative to jobs means the community will export those workers to other jurisdictions. Over time, sub-regional imbalances may appear. Millbrae has slightly more low-wage *jobs* than low-wage *residents* (where low-wage refers to jobs paying less than $25,000).

[10] 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). The jobs may differ from those reported in Figure 5 as the source for the time series is from administrative data, while the cross-sectional data is from a survey.

At the other end of the wage spectrum, the City has significantly more high-wage *residents* than high-wage *jobs* (where high-wage refers to jobs paying more than $75,000).[11]

Figure 2-8. Workers by Earnings, by Jurisdiction as Place of Work and Place of Residence

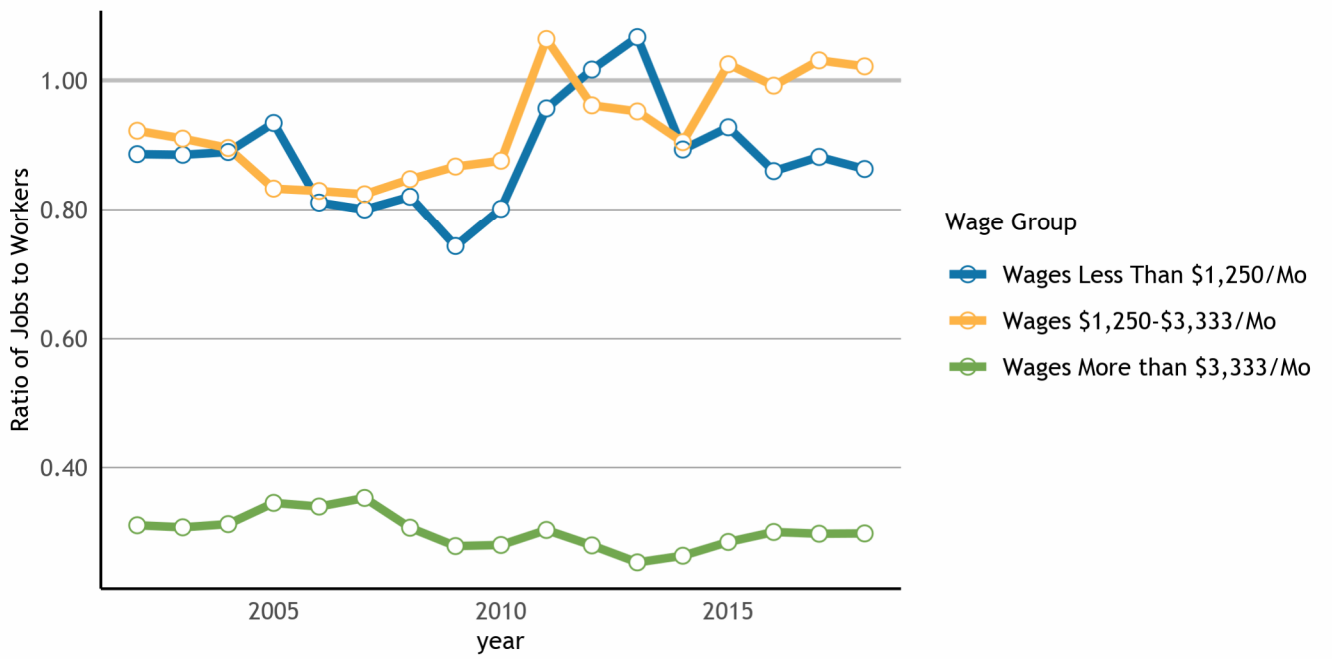


Source: *U.S. Census Bureau, ACS 5-Year Data 2015-2019, B08119, B08519*

Figure 2-9. Jobs-Worker Ratios, By Wage Group, shows the balance of a jurisdiction's resident workers to the jobs located there for different wage groups as a ratio instead - a value of 1 means that a city has the same number of jobs in a wage group as it has resident workers - in principle, a balance. Values above 1 indicate a jurisdiction will need to import workers for jobs in a given wage group. At the regional scale, this ratio is 1.04 jobs for each worker, implying a modest import of workers from outside the region.

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

Figure 2-9. Jobs-Worker Ratios, By Wage Group

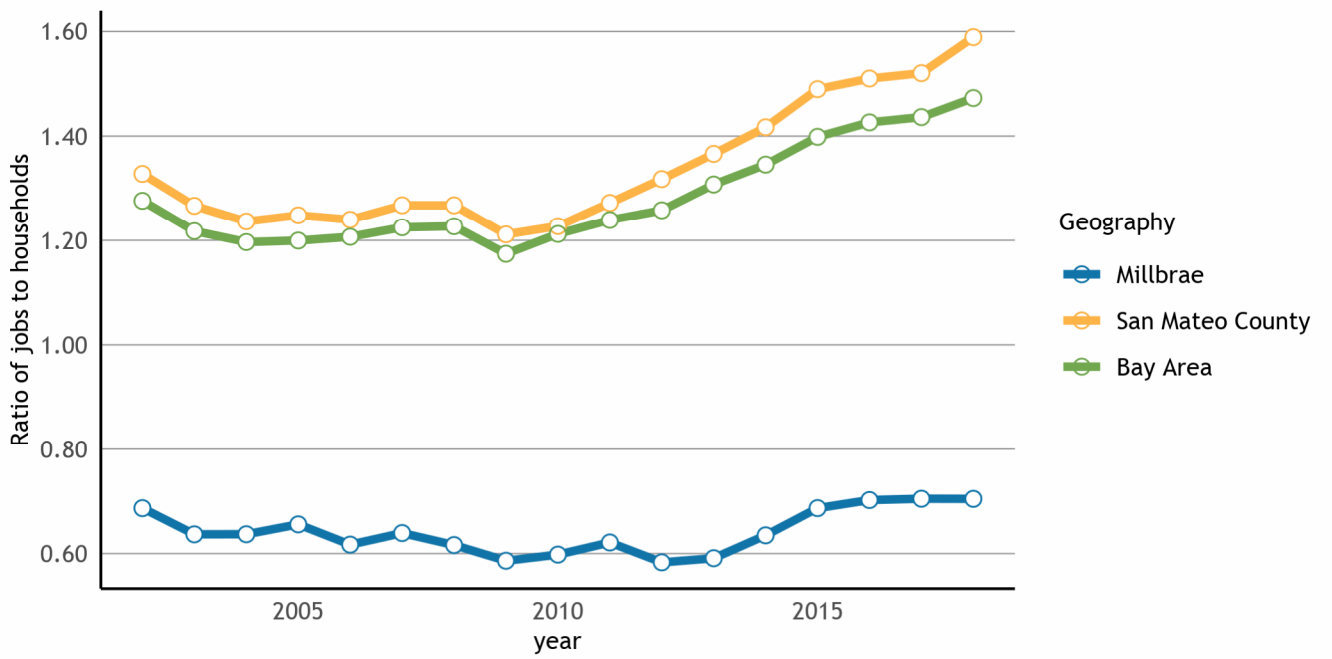


Source: *U.S. Census Bureau, Longitudinal Employer-Household Dynamics, Workplace Area Characteristics (WAC) files (Jobs); Residence Area Characteristics (RAC) files (Employed Residents), 2010-2018*

Such balances between jobs and workers may directly influence the housing demand in a community. New jobs may draw new residents, and when there is high demand for housing relative to supply, many workers may be unable to afford to live where they work, particularly where job growth has been in relatively lower-wage jobs. This dynamic not only means many workers will need to prepare for long commutes and time spent on the road, but in the aggregate, it contributes to traffic congestion and time lost for all road users.

If there are more jobs than employed residents, it means a city is relatively jobs-rich, typically also with a high job-to-household ratio. Thus, in bringing housing into the measure, the *jobs-household ratio* in Millbrae has increased from 0.69 in 2002, to 0.7 jobs per household in 2018. Comparatively, the County and Bay Area increased from 1.33 and 1.28 jobs per household in 2002 to 1.59 and 1.47 in 2018, respectively (see Figure 2-10, Jobs-Household Ratio). Relative to the County and the Bay Area, Millbrae is lacking in jobs and is an exporter of workers.

Figure 2-10. Jobs-Household Ratio



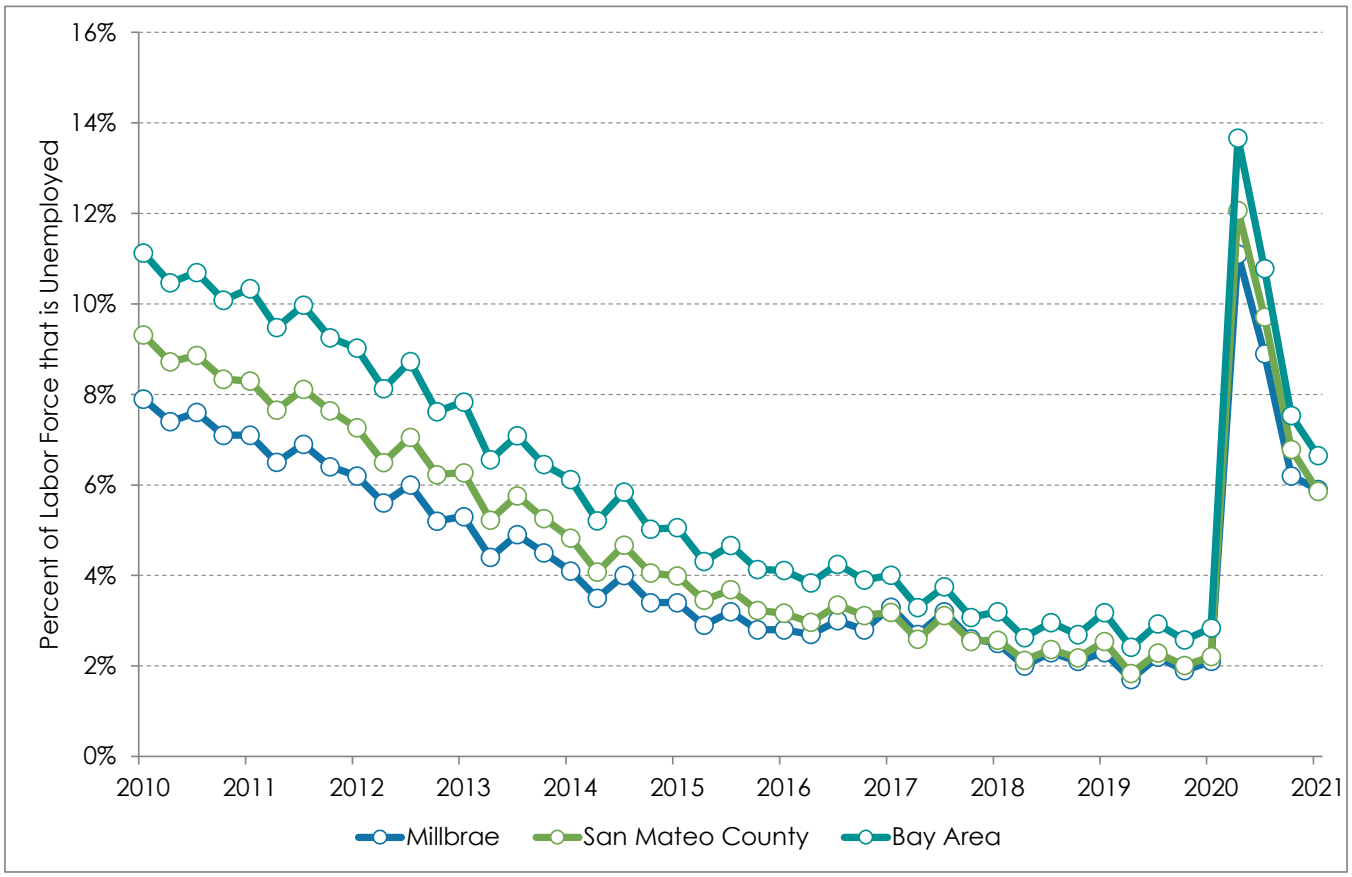
Source: *U.S. Census Bureau, Longitudinal Employer-Household Dynamics, Workplace Area Characteristics (WAC) files (Jobs), 2002-2018; California Department of Finance, E-5 (Households)*

2.5.2 Unemployment

Before the onset of the COVID-19 pandemic in early 2020, the City's unemployment rate was steadily decreasing. In January 2010, the California Employment Development Department reported that the City's unemployment rate was 7.9%. By January 2019, it had fallen to 2.3%. Across this period, the City's unemployment rate was consistently lower than the County's and Bay Area's (see Figure 2-11, Unemployment Rate). Jurisdictions throughout the region experienced a sharp rise in unemployment in 2020 due to impacts related to the COVID-19 pandemic, though with a general improvement and recovery in the later months of 2020.

The economic effects of the COVID-19 pandemic are widely reported on a regional, State, and national basis. Due to the business shutdown and loss of jobs due to the economic slowdown, employment and unemployment changed significantly from March 2020 through 2021. Data from the U.S. Bureau of Labor Statistics (BLS) described in Section 2.5.3, Employment Projections, provides a recent view of how the COVID-19 pandemic has affected employment and unemployment, as well as longer-term trends.

Figure 2-11. Unemployment Rate



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

2.5.3 Employment Projections

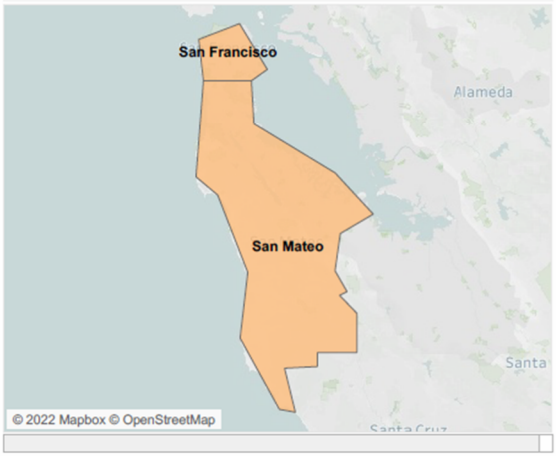
The City is in the San Francisco, Redwood City, South San Francisco Statistical Area (as defined by the BLS). The BLS provides projections for future employment in the Statistical Area, as shown in Figure 2-12, Employment Projections (2018–2028). The industry with the highest number of job openings is software development. Furthermore, the fastest-growing occupations are in health education and information technology.

Figure 2-12. Employment Projections (2018–2028)

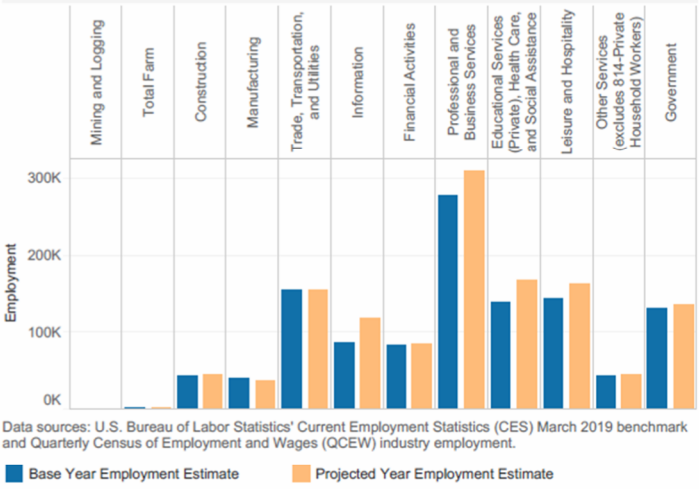
2018-2028 Local Employment Projections Highlights

Select Area Name
San Francisco-Redwood City-South San Francisco MD (San Francisco and San Mateo Counties)

San Francisco-Redwood City-South San Francisco MD (San Francisco and San Mateo Counties)



2018-2028 Industry Sector Employment Projections



Data sources: U.S. Bureau of Labor Statistics' Current Employment Statistics (CES) March 2019 benchmark and Quarterly Census of Employment and Wages (QCEW) industry employment.

Base Year Employment Estimate Projected Year Employment Estimate

Filter by Entry Level Education
Multiple values

2018-2028 Occupations with the Most Job Openings

Standard Occupational Classification	Occupational Title	Total Job Openings	Median Hourly Wage	Median Annual Wage
15-1132	Software Developers, Applications	38,710	$67.39	$140,175
13-1161	Market Research Analysts and Marketing Specialists	24,060	$42.60	$88,609
11-1021	General and Operations Managers	20,830	$71.96	$149,683
13-2011	Accountants and Auditors	17,690	$41.66	$86,660
13-1111	Management Analysts	14,460	$49.79	$103,551
11-3021	Computer and Information Systems Managers	13,310	$91.64	$190,609
15-1133	Software Developers, Systems Software	11,620	$66.47	$138,256
29-1141	Registered Nurses	11,450	$70.71	$147,070
11-3031	Financial Managers	10,780	$85.98	$178,831
11-2021	Marketing Managers	9,550	$81.90	$170,360

Total job openings are the sum of numeric change, exits, and transfers projected between 2018 and 2028.
Wages are from the 2020 first quarter and do not include self-employed or unpaid family workers. An estimate could not be provided for wages listed as $0.
Excludes "All Other" categories. These are residual codes that do not represent a detailed occupation.

2018-2028 Fastest Growing Occupations

Standard Occupational Classification	Occupational Title	Base Year Employment Estimate	Projected Year Employment Estimate	Percentage Change	Median Hourly Wage	Median Annual Wage
25-1071	Health Specialties Teachers, Postsecondary	3,260	4,860	49.1%	$0.00	$198,189
15-1122	Information Security Analysts	1,290	1,850	43.4%	$56.77	$118,079
15-2041	Statisticians	1,190	1,660	39.5%	$58.60	$121,897
15-1132	Software Developers, Applications	31,990	43,960	37.4%	$67.39	$140,175
27-4032	Film and Video Editors	760	1,020	34.2%	$31.54	$65,599
15-1111	Computer and Information Research Scientists	1,420	1,890	33.1%	$64.04	$133,199
15-2031	Operations Research Analysts	1,540	2,010	30.5%	$53.98	$112,280
13-1161	Market Research Analysts and Marketing Specialists	16,600	21,290	28.3%	$42.60	$88,609
25-1191	Graduate Teaching Assistants	880	1,120	27.3%	$0.00	$31,205
25-1066	Psychology Teachers, Postsecondary	550	700	27.3%	$0.00	$0

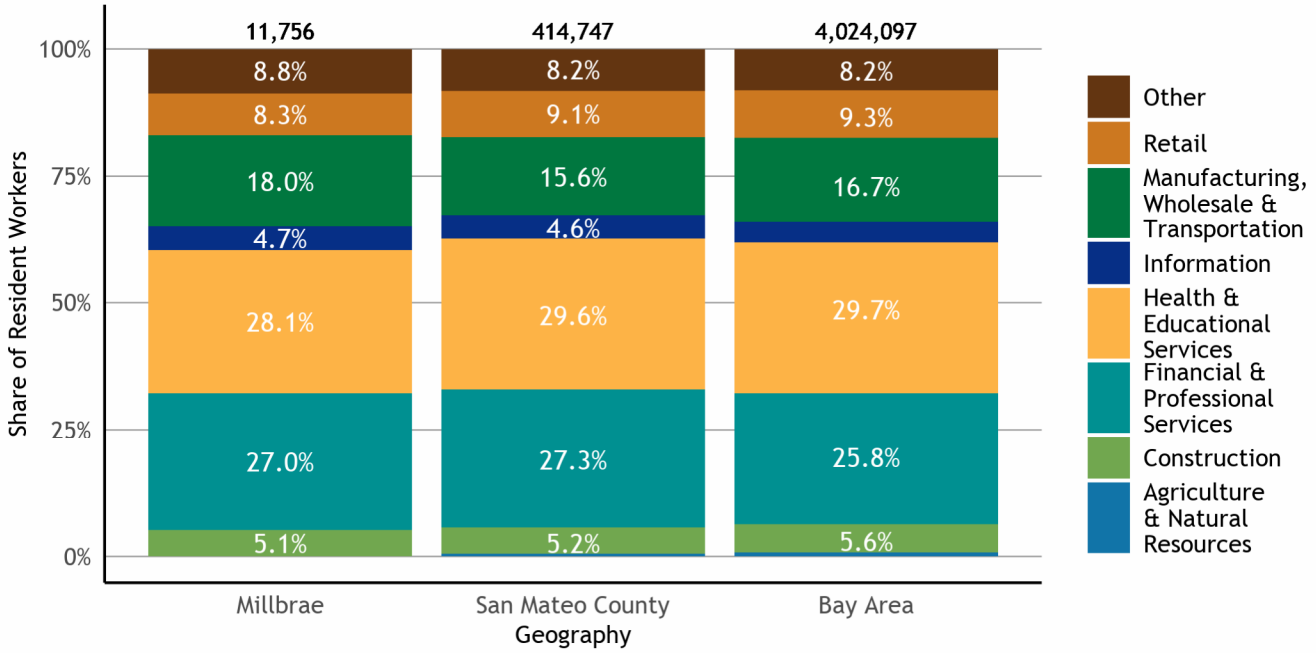
Fastest growing occupations are ranked by projected percentage change growth between 2018 and 2028.
Wages are from the 2020 first quarter and do not include self-employed or unpaid family workers. An estimate could not be provided for wages listed as $0.
Excludes "All Other" categories. These are residual codes that do not represent a detailed occupation.
Occupations with employment below 400 in 2018 are excluded.

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

2.5.4 Industries and Occupations

In terms of sectoral composition, the largest industry in which Millbrae, County, and Bay Area residents work is *Health & Educational Services* (see Figure 2-13, Resident Employment by Industry).

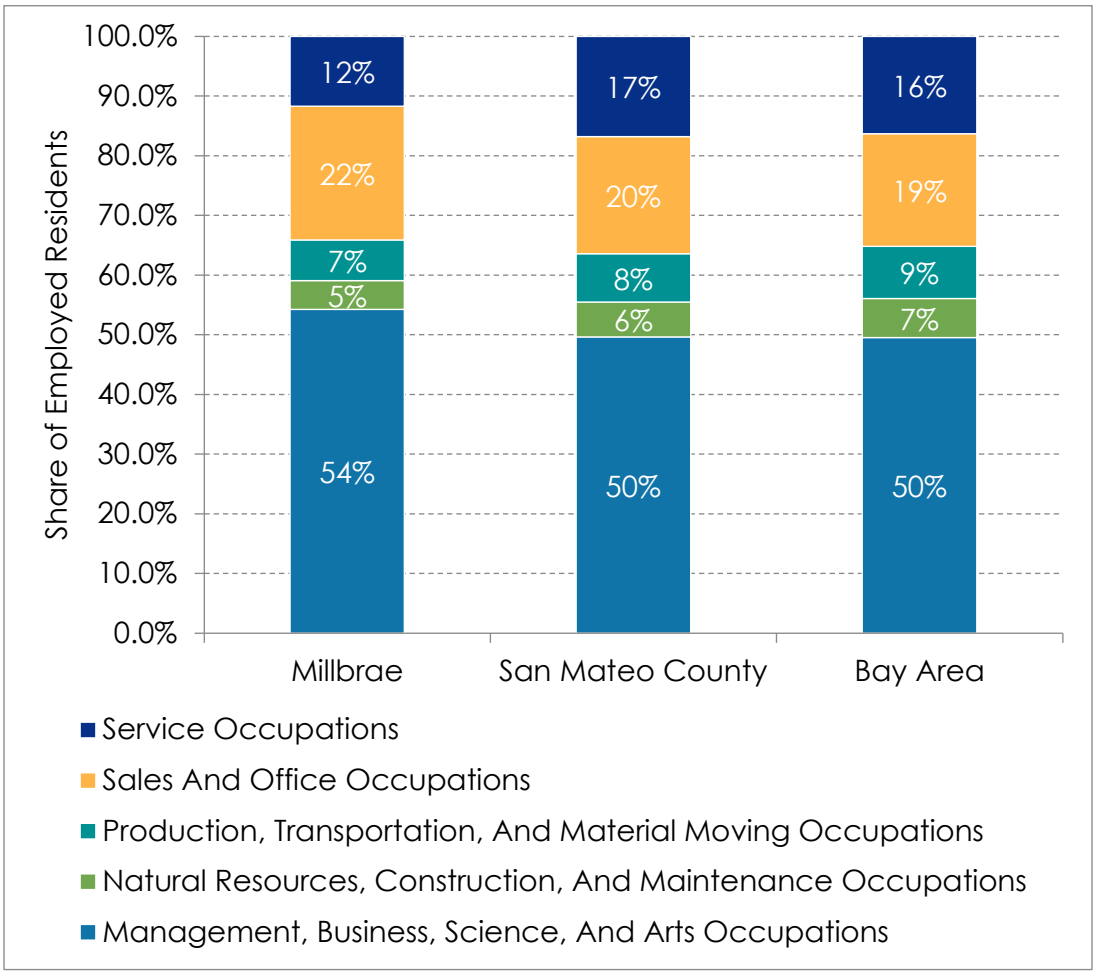
Figure 2-13. Resident Employment by Industry



Source: *U.S. Census Bureau, ACS 5-Year Data (2015-2019), Table C24030*

In addition to identifying employment by industry in Millbrae, it is also important to identify the types of employment City residents hold. As shown in Figure 2-14, Employment by Occupation, the most prevalent occupational category among City residents is management, business, Science, and Arts Occupations with 6,374 employees (54%). The second most prevalent type of work is Sales and Office Occupations with 2,634 employees (22%). Millbrae's employment by industry is consistent with both the County and the Bay Area. Furthermore, government jobs also make up an important portion of the employment industries in the City. Specifically, the City's two largest employers are the Millbrae School District and the County of San Francisco.

Figure 2-14. Employment by Occupation



Source: *U.S. Census Bureau, ACS 5-Year Data (2015-2019), Table C24010*

2.6 Household/Housing Characteristics

California Government Code, Section 65583(a), requires an assessment of housing needs and an inventory of resources and constraints relevant to meeting these needs, including an analysis and documentation of household characteristics. This section details housing costs compared to incomes, housing characteristics (including overcrowding), and housing stock conditions in the City.

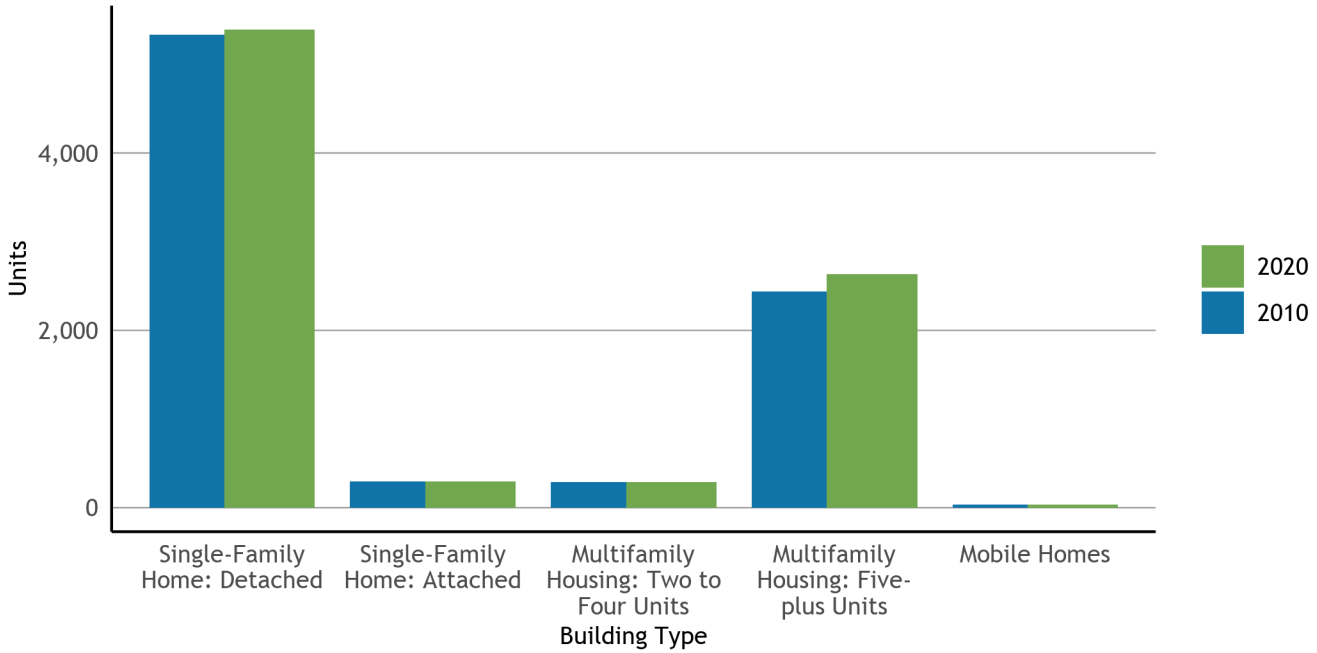
2.6.1 Housing Types

In recent years, most housing produced in the region and across the state consisted of single-family homes and larger multi-unit buildings. However, some households are increasingly interested in "missing middle housing" – including duplexes, triplexes, townhomes, cottage clusters, and accessory dwelling units (ADUs). These housing types may open up more options

across incomes and tenure, from young households seeking homeownership options to seniors looking to downsize and age in place.

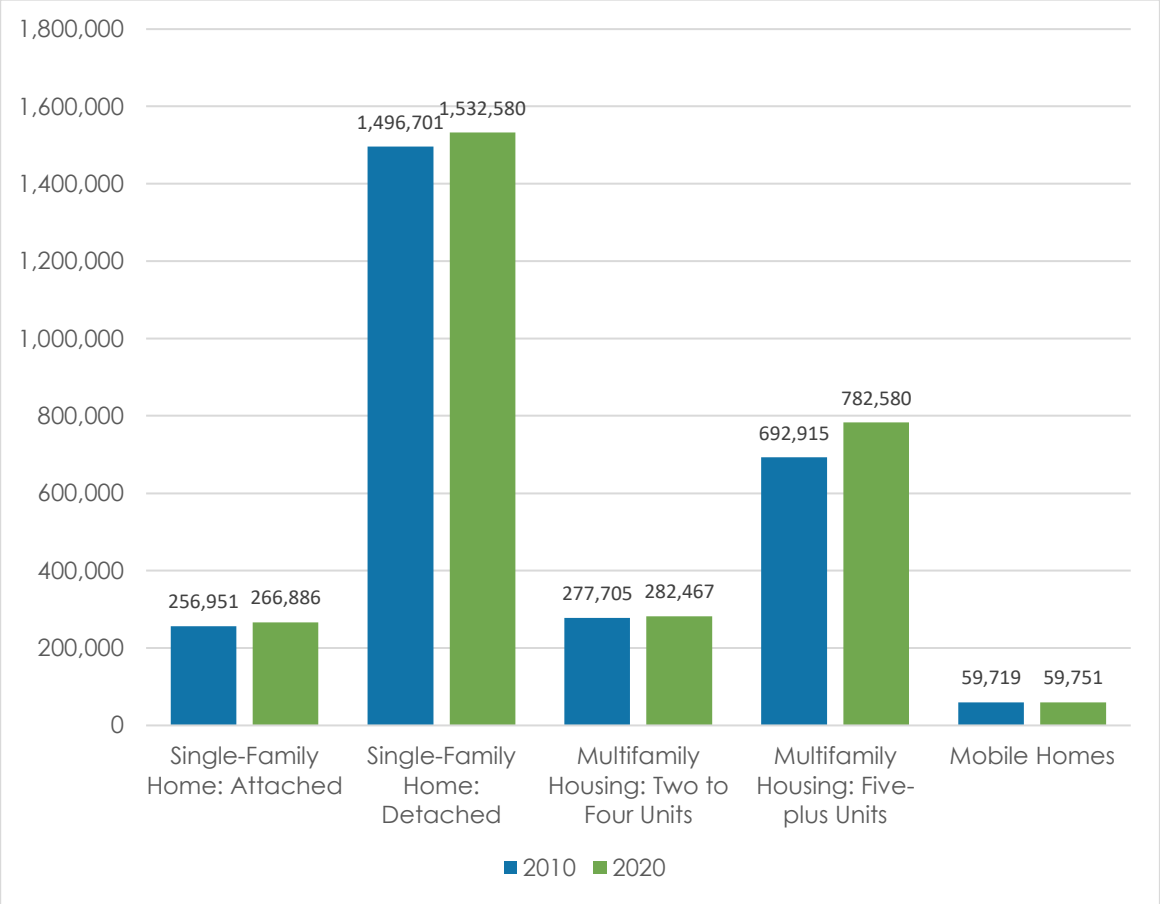
The housing stock of Millbrae in 2020 was made up of 62.4% single-family detached homes, 3.4% single-family attached homes, 3.3% multifamily homes with two to four units, 30.5% multifamily homes with five or more units, and 0.4% mobile homes (see Figure 2-15, Millbrae Housing Stock Characteristics and Trends). In Millbrae, the housing type that experienced the most growth between 2010 and 2020 was *Multifamily Housing: Five-plus Units*.

Figure 2-15. Millbrae Housing Stock Characteristics and Trends



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

Figure 2-16. Bay Area Housing Stock Characteristics and Trends



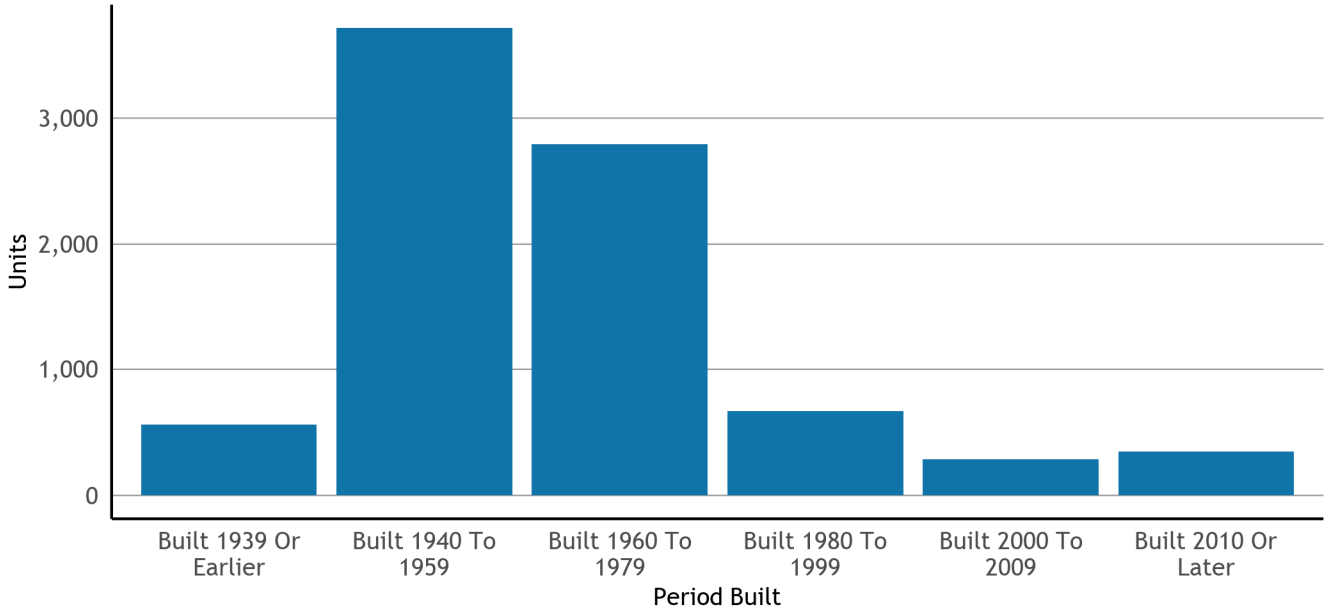
Source: *California Department of Finance, E-5 series*

As shown in Figure 2-15, Millbrae Housing Stock Characteristics and Trends, and Figure 2-16, Bay Area Housing Stock Characteristics and Trends, single-family residential units represent the majority of housing types. However, development trends, as indicated in the previous section, point to the fact that more multifamily units than single-family units have been built in Millbrae in recent years. As shown in Figure 2-15, while single-family units have increased by 1.1% between 2010 and 2020, multifamily units have increased by 7.2% during this same period. Multifamily units are expected to be the primary housing type built during the 6th Cycle planning period.

2.6.2 Year Built

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 Millbrae, the largest proportion of the housing stock was built from 1940 to 1959, with 3,714 units constructed during this period (see Figure 2-17, Housing Units by Year Structure Built). Since 2010, 4.2% of the current housing stock was built, which is 348 units.

Figure 2-17. Housing Units by Year Structure Built



Source: *U.S. Census Bureau, ACS 5-Year Data (2015-2019), Table B25034*

Data on the age of the current housing stock illustrates historical development patterns and can indicate the overall condition of the housing stock, as older homes require more maintenance and repair (and at greater costs) than units that are 30 years old or fewer. The abundance of homes in the City that are 40 years old or older suggests that the City could benefit from a program to encourage preservation and/or renovations.

2.6.3 Vacancy

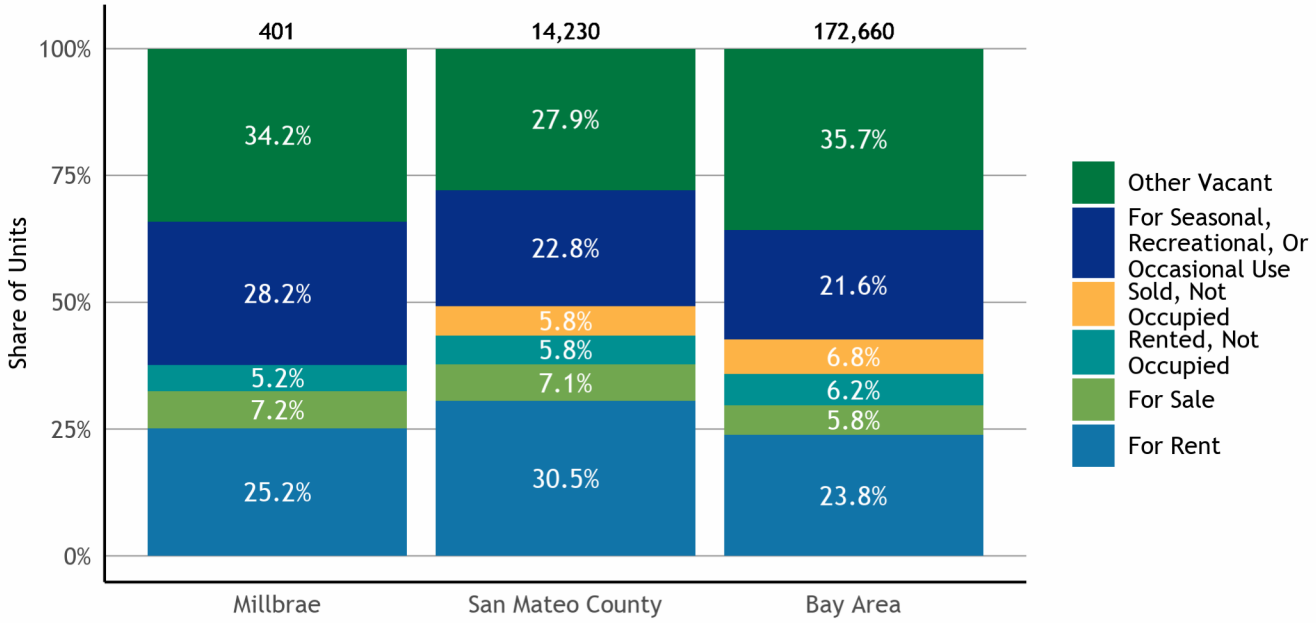
Vacant units make up 4.8% of the overall housing stock in Millbrae. The rental vacancy stands at 1.5%, while the ownership vacancy rate is 3.3%. Of the vacant units, the most common type of vacancy is *Other Vacant* (see Figure 2-18, Vacant Units by Type).[12]

Throughout the Bay Area, vacancies make up 2.6% of the total housing units, with homes listed for rent; units used for *recreational or occasional use*, and units not otherwise classified (*other vacant*) making up the majority of vacancies. The Census Bureau classifies a unit as vacant if no one is occupying it when census interviewers are conducting the ACS or Decennial Census. Vacant units classified as "for recreational or occasional use" are those that are held for short-term periods of use throughout the year. Accordingly, vacation rentals and short-term rentals

[12] The vacancy rates by tenure are for a smaller universe than the total vacancy rate first reported, which in principle includes the full stock (4.8%). 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*.

like Airbnb are likely to fall into this category. The Census Bureau classifies units as "other vacant" if they are vacant due to foreclosure, personal/family reasons, legal proceedings, repairs/renovations, abandonment, preparation for being rented or sold, or vacant for an extended absence for reasons such as a work assignment, military duty, or incarceration.[13] 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.[14]

Figure 2-18. Vacant Units by Type



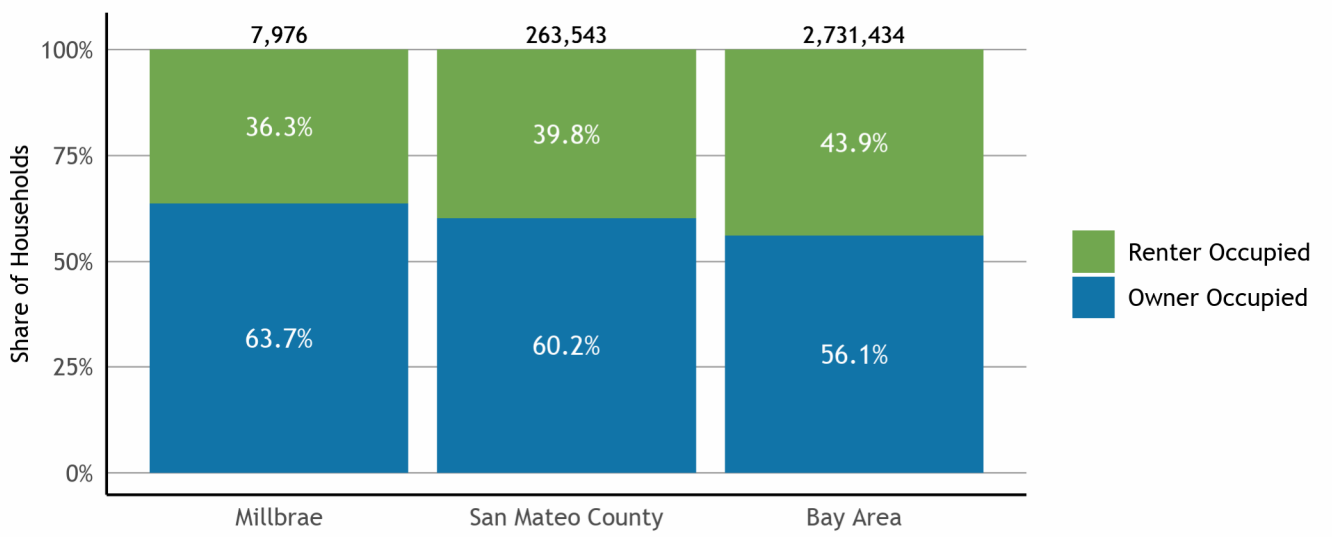
Source: *U.S. Census Bureau, ACS 5-Year Data (2015-2019), Table B25004*

2.6.4 Tenure

The number of residents who own their homes compared to those who rent their homes can help identify the level of housing insecurity – the ability of individuals to stay in their homes – in a city and region. Generally, renters may be displaced more quickly if prices increase. In Millbrae, there are a total of 7,976 housing units and fewer residents rent than own their homes: 36.3% versus 63.7% (see Figure 2-19, Housing Tenure). By comparison, 39.8% of households in San Mateo County are renters, while 44% of Bay Area households rent their homes.

[13] For more information, see pages 3 through 6 of this list of definitions prepared by the Census Bureau: https://www.census.gov/housing/hvs/definitions.pdf.
[14] 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 2-19. Housing Tenure



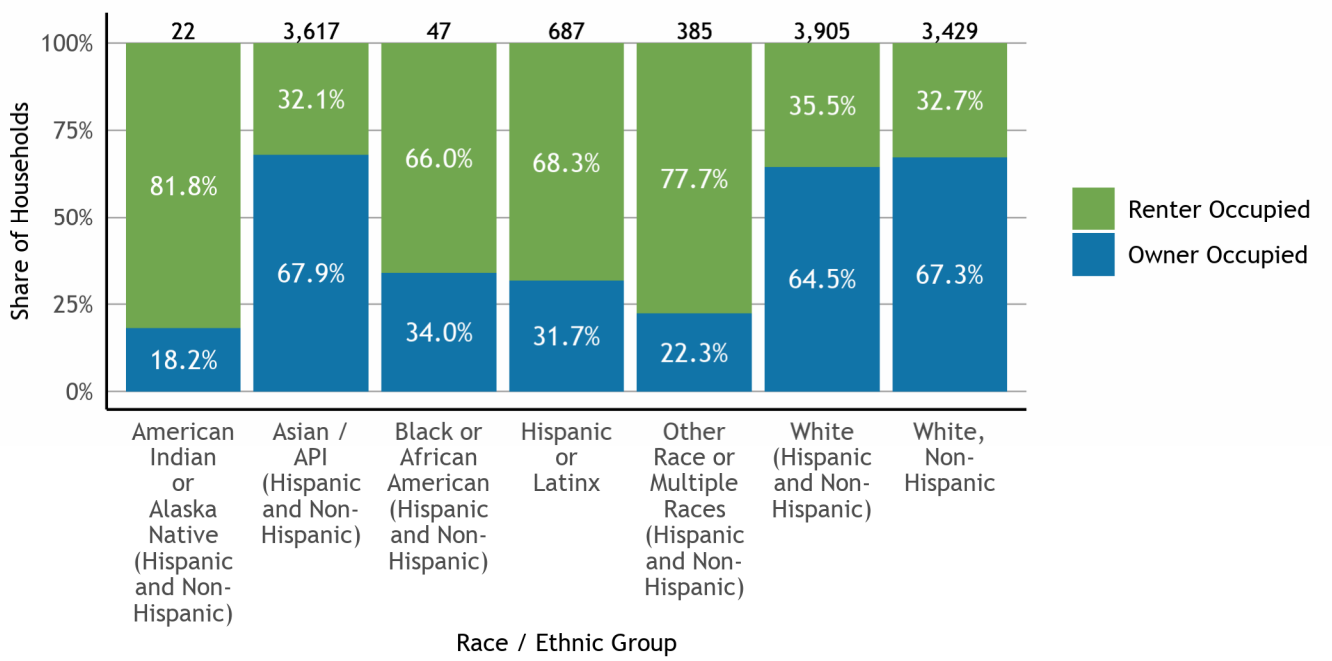
Source: *U.S. Census Bureau, ACS 5-Year Data (2015-2019), Table B25003*

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 limit access to homeownership for communities of color while facilitating homebuying for white residents.

While many of these policies, such as redlining, have been formally discontinued, the impacts of race-based policy are still evident across Bay Area communities.[15] As shown in Figure 2-20, Housing Tenure by Race of Householder, 34% of Black households in Millbrae owned their homes, while homeownership rates were 67.9% for Asian households, 31.7% for Latinx households, and 64.5% for White households. Notably, recent changes to state law require local jurisdictions to examine these dynamics and other fair housing issues when updating their Housing Elements.

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

Figure 2-20. Housing Tenure by Race of Householder

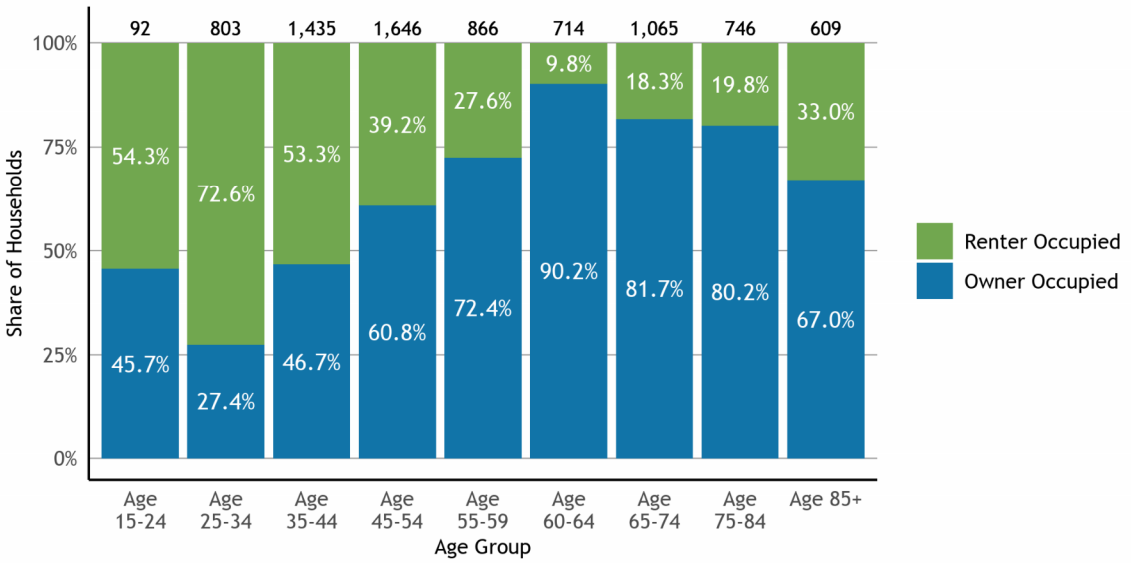


Source: *U.S. Census Bureau, ACS 5-Year Data (2015-2019), Table B25003(A-I)*

The age of residents who rent or own their homes 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 Millbrae, 60.2% of householders between the ages of 25 and 44 are renters, while 22.5% of householders over 65 are (see Figure 2-21, Housing Tenure by Age). Generally, younger Millbrae residents are more likely to rent, while older residents are more likely to own.

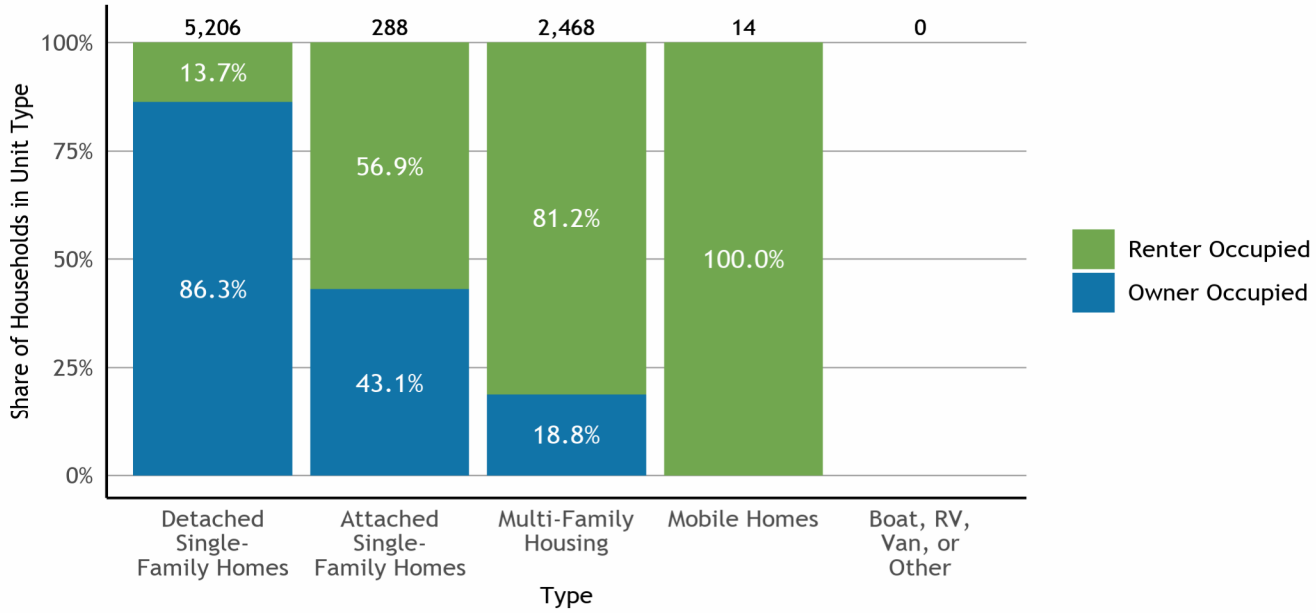
Figure 2-21. Housing Tenure by Age



Source: *U.S. Census Bureau, ACS 5-Year Data (2015-2019), Table B25007*

In many cities, homeownership rates for households in single-family homes are substantially higher than the rates for households in multifamily housing. In Millbrae, 86.3% of households in detached single-family homes are homeowners, while 18.8% of households in multifamily housing are homeowners (see Figure 2-22, Housing Tenure by Housing Type).

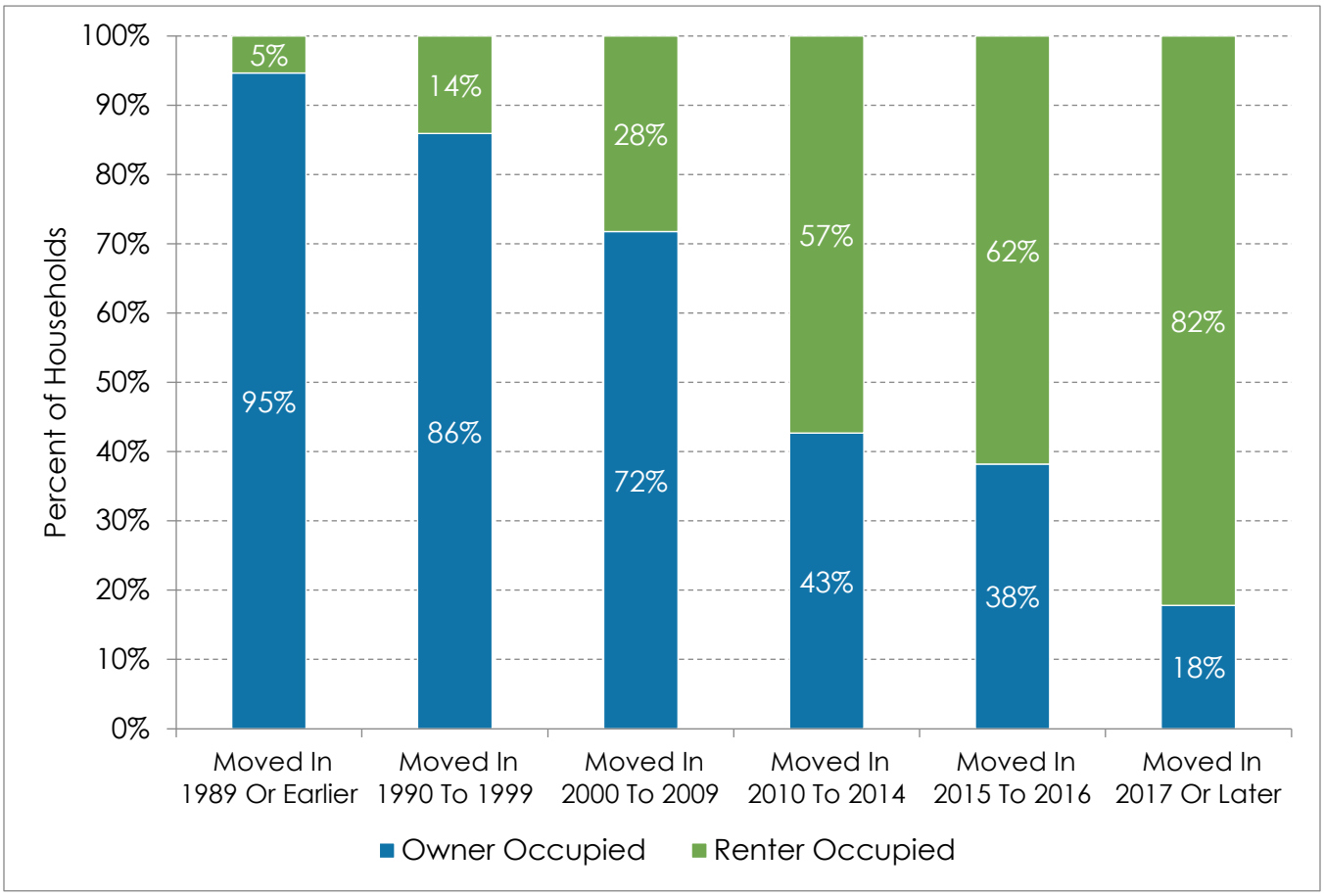
Figure 2-22. Housing Tenure by Housing Type



Source: *U.S. Census Bureau, ACS 5-Year Data (2015-2019), Table B25032*

According to the ACS 5-Year Data (2015–2019), 41.6% of households located to their current Millbrae residence in 2010 or later. Additionally, as shown in Figure 2-23, Housing Tenure by Year Moved to Current Residence, renter-occupied households are more likely to have moved to their current residence more recently than owner-occupied households, as ownership encourages residents to stay in one home for a longer duration.

Figure 2-23. Housing Tenure by Year Moved to Current Residence

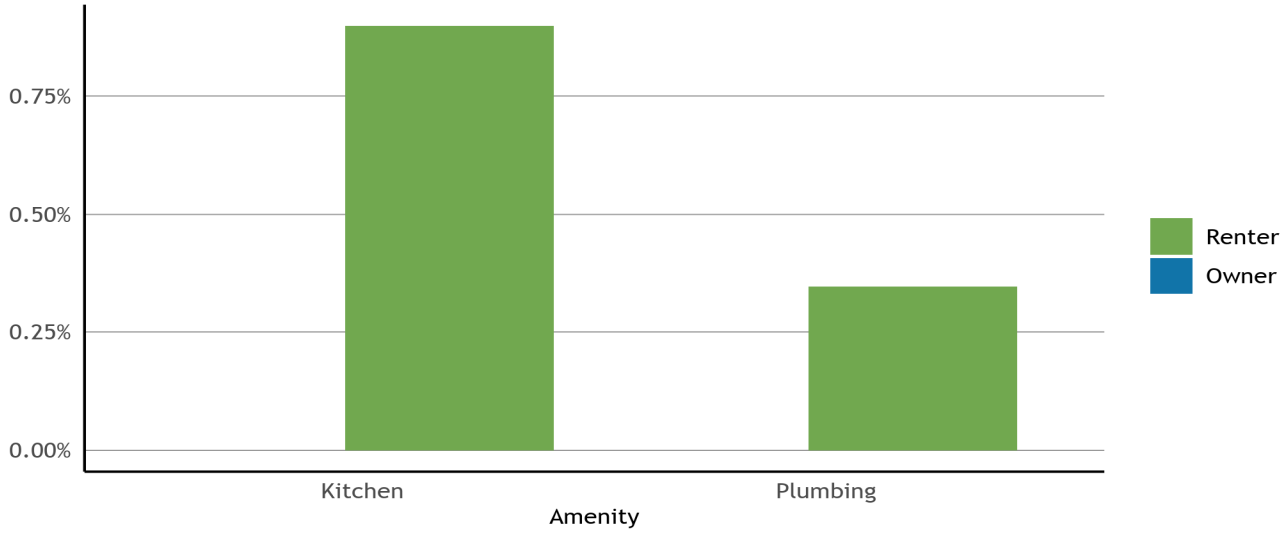


Source: *U.S. Census Bureau, ACS 5-Year Data (2015-2019), Table B25032*

2.6.5 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 to afford housing. Generally, there is limited data on the extent of substandard housing issues in a community. However, as shown in Figure 2-24, Substandard Housing Issues, there is a small rate of substandard conditions present in Millbrae. For example, 0.9% of renters in Millbrae reported lacking a kitchen and 0.3% of renters lack plumbing, compared to 0% of owners who lack a kitchen and 0% of owners who lack plumbing.

Figure 2-24. Substandard Housing Issues



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

2.6.5.1 Windshield Survey

In addition to the ACS 5-Year Data (2015-2019) provided above, the City performed a windshield survey in the Millbrae neighborhood east of the El Camino Real corridor to estimate the number of residential structures in need of rehabilitation and replacement. This neighborhood has been historically disadvantaged relative to the rest of the City. There have been several issues over the years such as flooding, neglected parks, lack of sidewalks on several blocks, and a general lack of investment.

More specifically, City Planning Division staff conducted a windshield survey in this area to evaluate the physical condition of the residential structures as visible from the public right-of-way. It should be noted that the survey did not include any evaluation of the interior housing conditions of the residential structures surveyed nor did it include an evaluation of any other physical conditions that were not visible from the street. Additionally, while the data presented in Figure 2-24 identified a small percentage of homes surveyed experienced a lack of kitchen facilities, the windshield survey did not seek to corroborate these findings, solely focusing on the demonstration of rehabilitative needs of the exterior of the structures being surveyed.

In total, City staff surveyed approximately 600 residential parcels, and over 96% were evaluated as being in sound condition, meaning they presented no visible signs of overdue maintenance or minor damage to the residential structure's exterior, foundation, roof, or windows and doors as visible from the street. The survey did, however, identify 25 parcels (or 4% of the residential structures surveyed) that show signs of deterioration, dilapidation, and/or unsafe conditions. The conditions observed included: damaged siding or stucco, damaged fences, damaged garage doors, broken room windows, damaged roofs, and broken garage door windows.

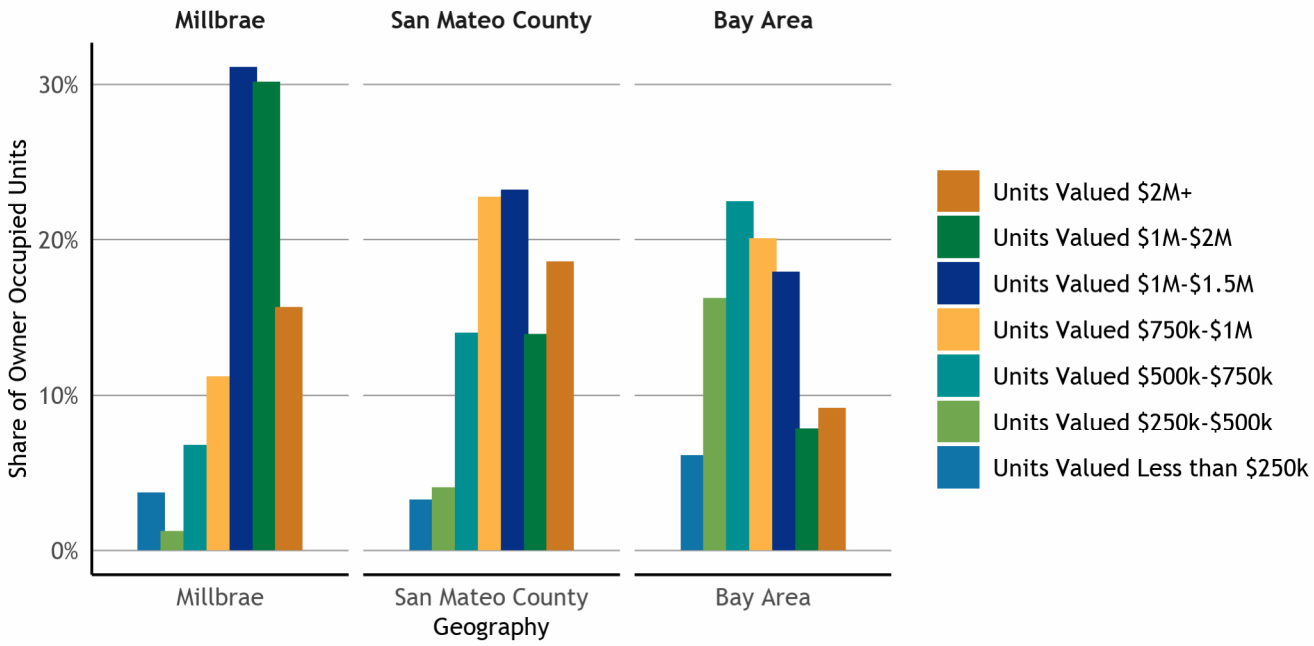
Although 4% of the residential structures surveyed showed signs of deterioration, dilapidation, and/or unsafe conditions, the City included a program HIP-6, Encourage the Rehabilitation of Substandard Housing Units, in Chapter 8, Housing Plan, of this Housing Element to encourage the rehabilitation of substandard housing units.

2.6.6 Home and Rent Values

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 Millbrae was estimated at $1,744,260 by December 2020, per data from Zillow. The largest proportion of homes was valued between $1M-$1.5M (see Figure 2-25, Home Values of Owner-Occupied Units). By comparison, the typical home value is $1,418,330 in San Mateo County and $1,077,230 in the Bay Area, with the largest share of units valued at $1M-$1.5M (County) and $500K-$750K (region).

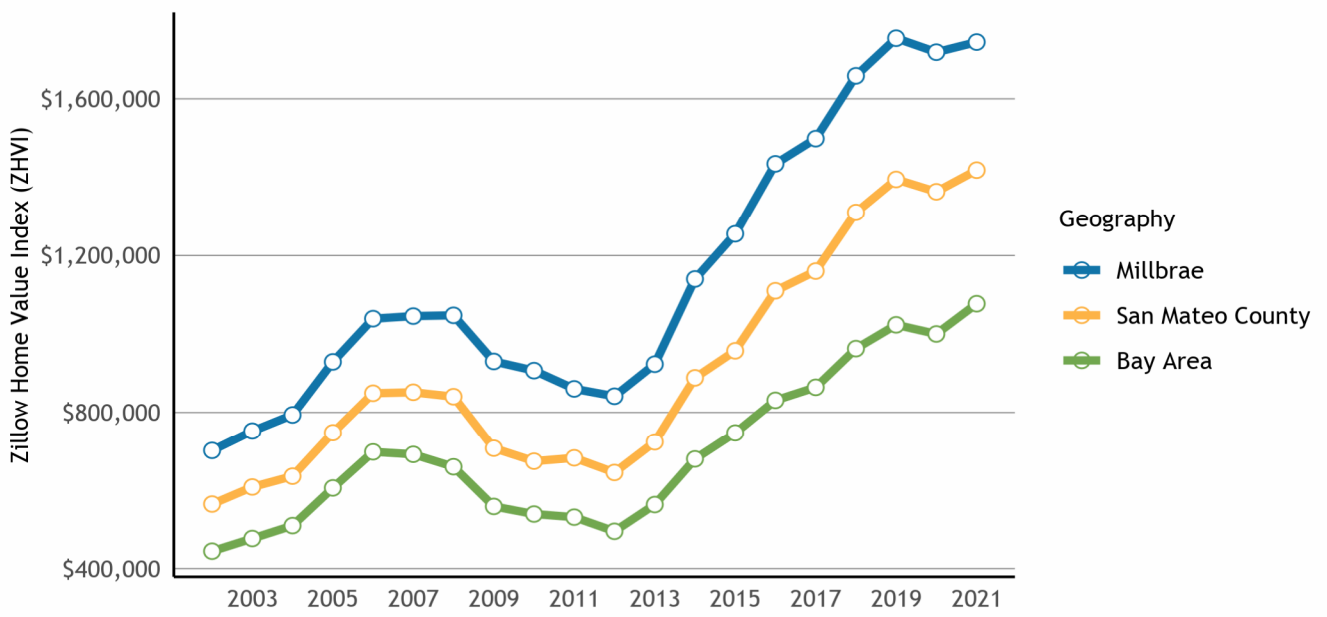
The region's home values have increased steadily since 2000, besides a decrease during the Great Recession. The rise in home prices has been especially steep since 2012, with the median home value in the Bay Area nearly doubling during this time. **Since 2001, the typical home value has increased 148.3% in Millbrae from $702,420 to $1,744,260.** This change is below the change in San Mateo County, and above the change for the region (see Figure 2-26, Zillow Home Value Index).

Figure 2-25. Home Values of Owner-Occupied Units



Source: *U.S. Census Bureau, ACS 5-Year Data (2015-2019), Table B25075*

Figure 2-26. Zillow Home Value Index



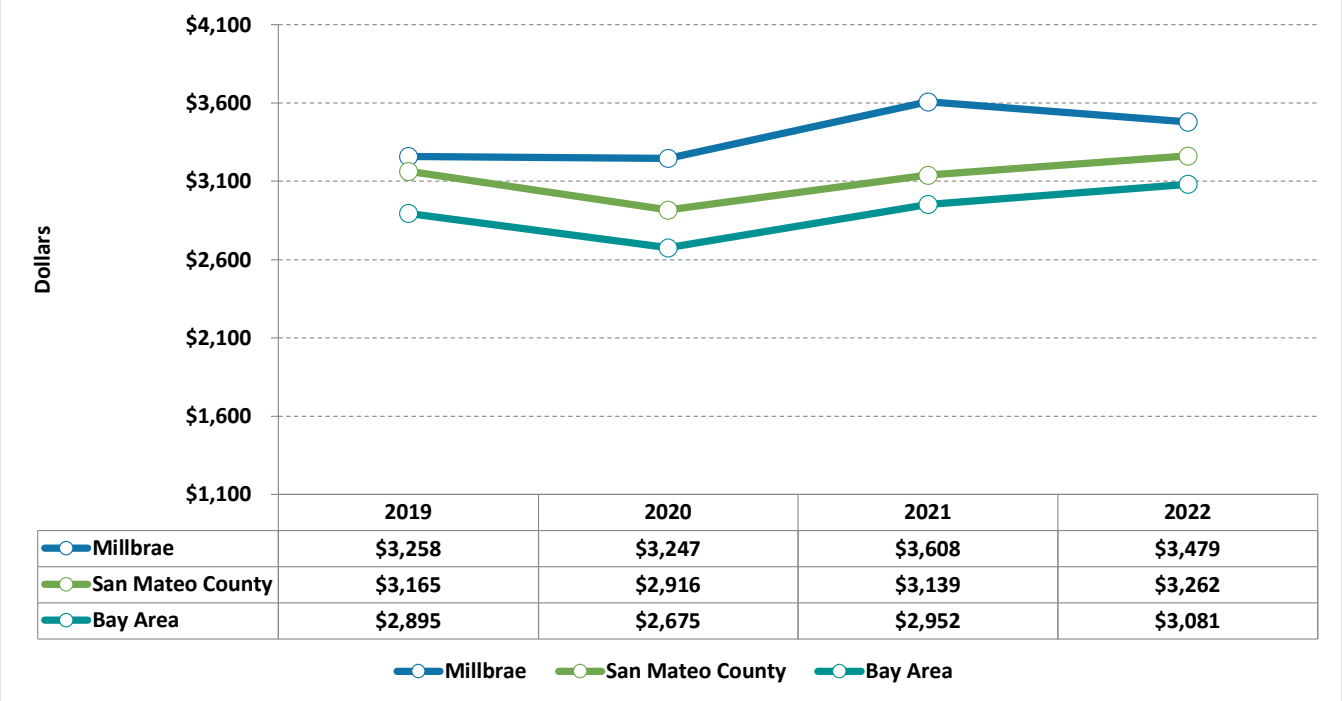
Source: *Zillow, Zillow Home Value Index*

Similar to home values, rents have also increased dramatically across the Bay Area in recent years. Many renters have been priced out, evicted, or displaced, particularly communities of color. 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, and sometimes, out of the State.

The Zillow Observed Rent Index (a "smoothed measure of the typical observed market-rate rent across a given region") reports that the median monthly rent in 2022 was $3,479 for the City, $3,262 for San Mateo County, and $3,081 for the Bay Area. As such, rents in Millbrae are higher than those in the surrounding areas. In addition, the median rent in Millbrae has increased by 7% from 2019 to 2022, while San Mateo County and the Bay Area saw a 3% and 6% increase, respectively.

Although the median rent in Millbrae is higher and has grown at a slightly higher rate than San Mateo County and the Bay Area, the City experienced a 4% decrease in median rent from 2021 to 2022, while both the County and Bay Area experienced a 4% increase. While this does not guarantee a continued decrease in median rent, it could signal a change in median rent trends. Specifically, 2022 marked the first year in over a decade (as evidenced by Figures 2-27 and 2-29) where the median rent in Millbrae decreased, while the San Mateo County and Bay Area's median rent increased.

Figure 2-27. Median Contract Rent, Zillow

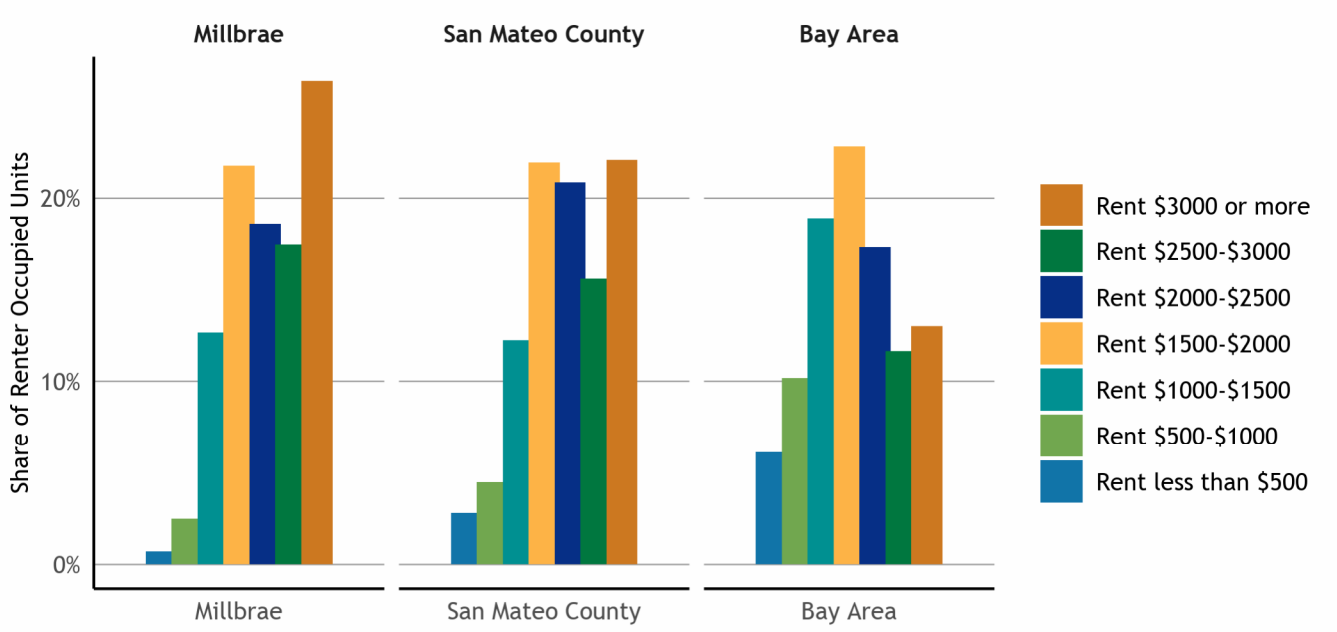


	2019	2020	2021	2022
Millbrae	$3,258	$3,247	$3,608	$3,479
San Mateo County	$3,165	$2,916	$3,139	$3,262
Bay Area	$2,895	$2,675	$2,952	$3,081

Source: *Zillow Observed Rent Index (ZORI)*

According to the U.S. Census Bureau 2015-2019 ACS Data, the largest proportion (26.4%) of rental units in Millbrae are rented for $3,000 or more, followed by 21.8% of units renting for median rents between $1,500 and $2,000 (see Figure 2-28, Contract Rents for Renter-Occupied Units). Looking beyond the City, the largest share of units in San Mateo County rent for $3,000 or more, while units in the Bay Area have median rents between $1,500-$2,000.

Figure 2-28. Contract Rents for Renter-Occupied Units

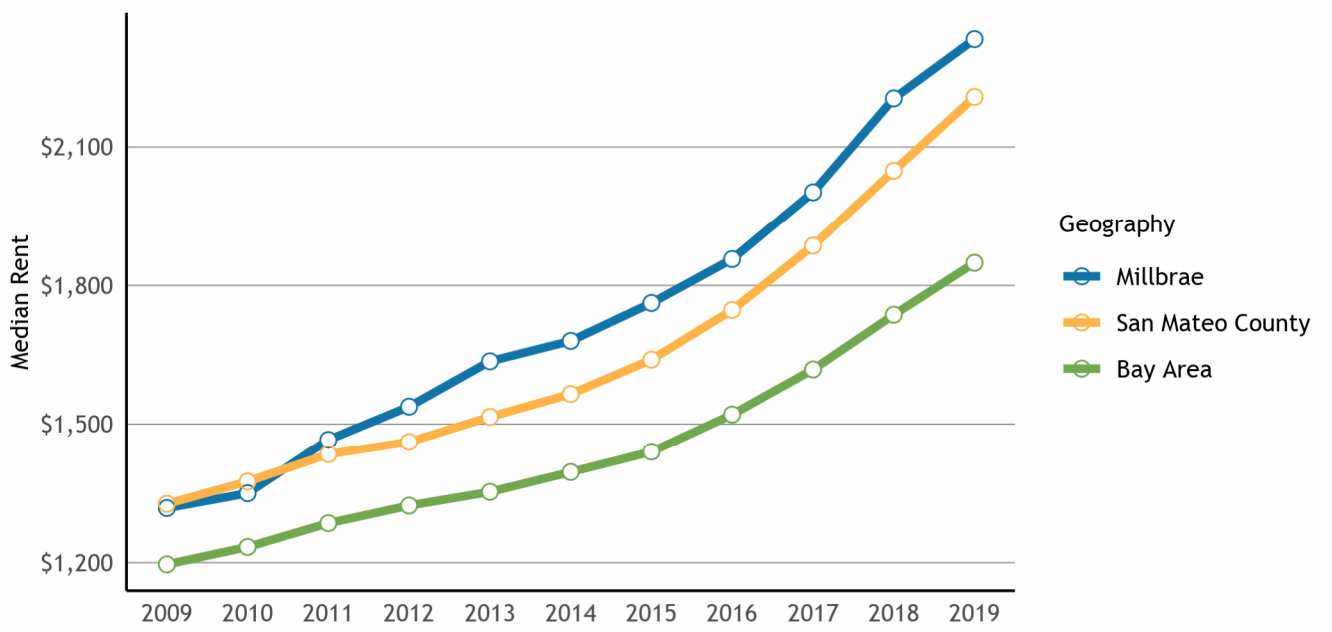


Source: *U.S. Census Bureau, ACS 5-Year Data (2015-2019), Table B25056*

The 2015–2019 ACS 5-Year Data reports that the median monthly rent in the City is $2,333 compared to $1,849 and $2,208 in the Bay Area and County, respectively. Thus, rents in Millbrae are higher than those in the surrounding areas. Furthermore, while rents in the County as a whole have increased since 2009, rents in the City have increased at a faster pace. For instance, rents grew 77% in the City between 2009 and 2019 compared to 66.4% growth in the County and 54.6% in the Bay Area during that same period. Figure 2-27, Median Contract Rent, Zillow, provides a comparison of rents in the City, the County, and the Bay Area between 2009 and 2019.[16]

[16] While the data on home values shown in Figure 2-26 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, which may not fully reflect current rents.

Figure 2-29. Median Contract Rent, U.S. Census



Source: *U.S. Census Bureau, ACS 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.*

It is important to note that Figure 2-28 and Figure 2-29 have different data sources than Figure 2-27. Figure 2-27 includes the most current market data from Zillow.com, a leading real estate marketplace site, while Figures 2-28 and 2-29 analyze projections generated by the U.S. Census Bureau. The difference in data sources can lead to slight divergences that typically portray median rents as more affordable than they typically are.

2.6.7 Permits

According to HCD, 461 building permits for housing units were issued by the City between 2015 and 2022 (the 5th Cycle Housing Element planning period). Of this total, 314 were for above moderate-income units, 36 moderate-income units, 70 low-income units, and 41 very low-income units (Table 2-5, Housing Permitting). The 461 housing permits issued in seven years are less than the City's 5th Cycle Housing Element Regional Housing Needs Allocation (RHNA) of 663 units. Notably, the City permitted more above moderate-income units than the RHNA for that income level.

During the 6th Cycle Housing Element planning period (which started on June 30, 2022), the City has received and issued building permits or expects to receive building permit applications, for over 1,700 housing units (Table 2-5). Of this amount, 269 are for affordable housing units.

It is also notable that the City's 6th Cycle Housing Element RHNA of 2,199 is 232% more than that of the 5th Cycle RHNA.

Table 2-5. Housing Permitting

Income Group	5th Cycle			6th Cycle		
	RHNA	Permits	% Attained	RHNA	Pipeline	% Attained
Very Low-Income Permits	193	41	21%	575	69	12%
Low-Income Permits	101	70	69%	331	156	47%
Moderate-Income Permits	112	36	32%	361	44	12%
Above Moderate-Income Permits	257	314	122%	932	1432	154%
Total	**663**	**461**	**67%**	**2,199**	**1,701**	

Source: *HCD APR Data Dashboard, 5th Cycle Annual Progress Report Permit Summary (2021), and City of Millbrae (6th cycle permits).*

2.6.8 Overpayment and Overcrowding

California Government Code Section 65583(a)(2), requires analysis and documentation of household characteristics, including the level of payment compared to the ability to pay; housing characteristics, including overcrowding; and housing stock condition (See Section 2.6.5 Substandard Housing).

2.6.8.1 Household Income

Household income demonstrates a household's or individual's ability to pay for housing. HCD identifies the following household income categories based on the area median income (AMI) of each county:

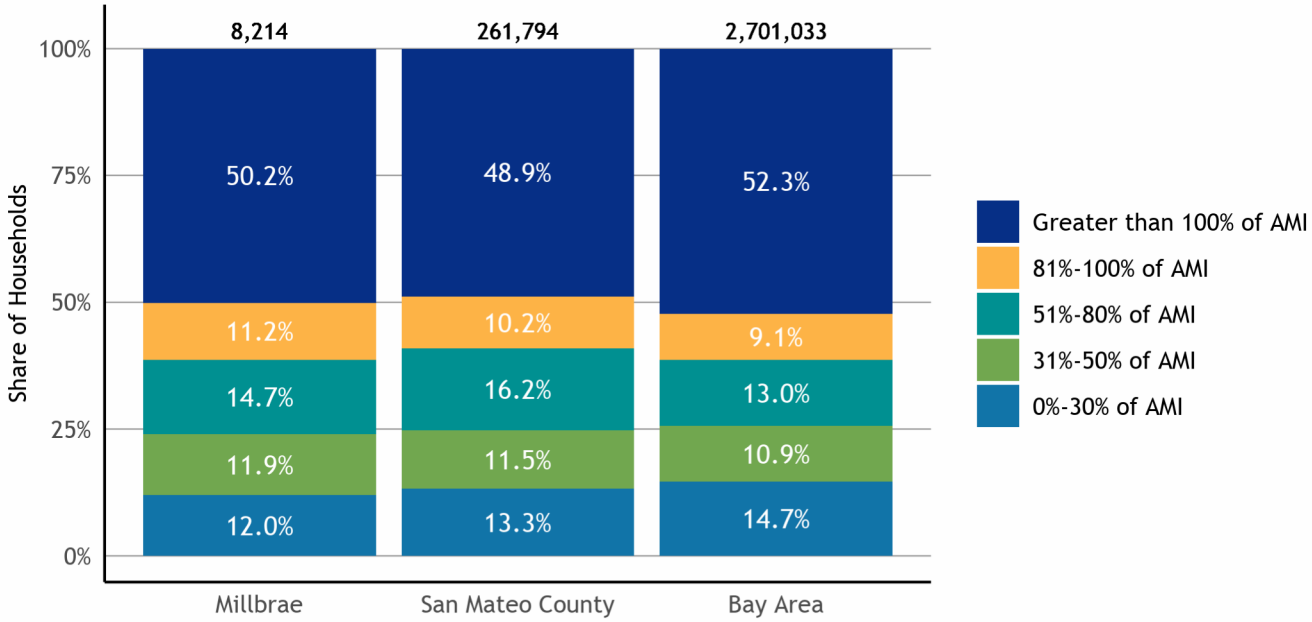
- Extremely Low-income: Households with income up to 30% of the AMI.
- Very Low-income: Households with income between 31% and 50% of the AMI.
- Low-income: Households with income between 51% and 80% of the AMI.
- Moderate-income: Households with income between 81% and 120% of the AMI.
- Above moderate-income: Households with income over 120% of the AMI.

The Extremely Low-Income category is considered a subset of the Very Low-Income category. The three lowest income categories (i.e., Extremely Low-, Very Low-, and Low-Income) are commonly referred to collectively as "lower" income levels in the California Government Code and by HCD. Figure IV-41 of Appendix B, Affirmatively Furthering Fair Housing, shows that Millbrae does not have a large proportion of lower-income units located in the area.

The HUD 2013–2017 Comprehensive Housing Affordability Strategy (CHAS) data separates households slightly differently, with a category for households with income between 81% and 100% of the AMI (below median) and a category for households with income above 100% of the AMI (above median).

As shown in Figure 2-30, Households by Household Income Level, 39% of Millbrae households had lower incomes, 11% had below-median incomes, and 50% of households had above-median incomes. **The City has a slightly lower rate of lower-income households than the County (41%) and the same as the Bay Area (39%).**

Figure 2-30. Households by Household Income Level

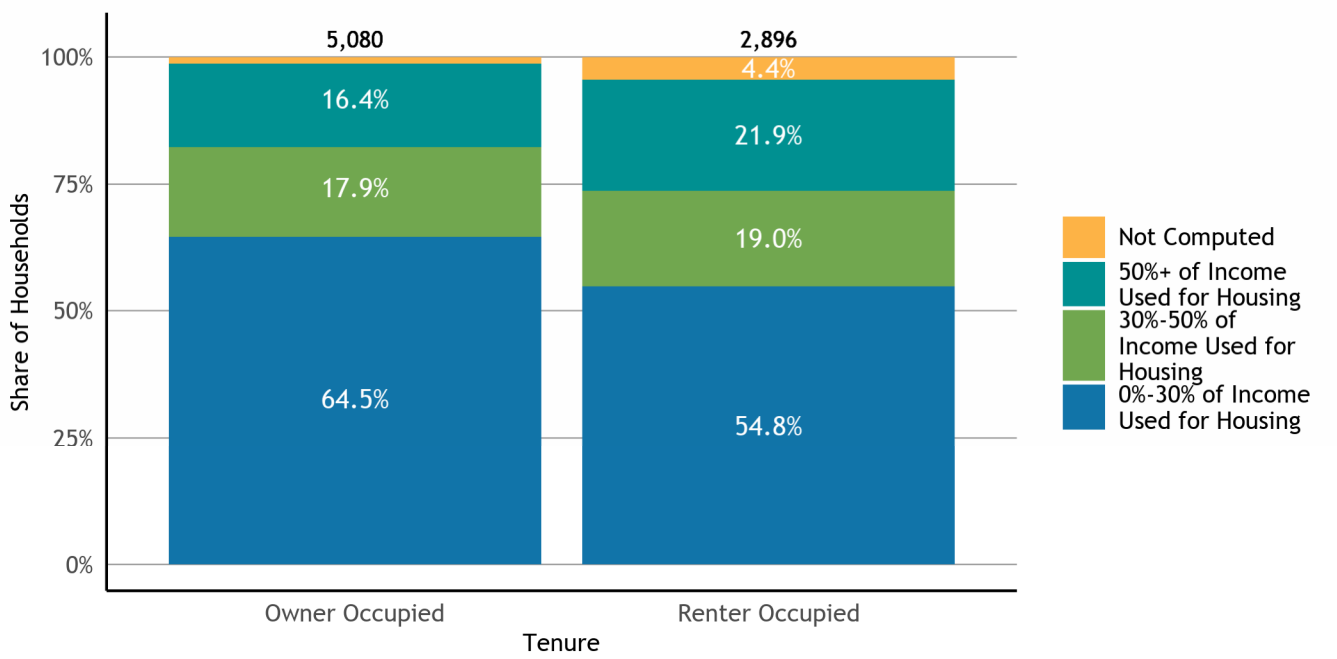


Source: *HUD, Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release*

2.6.8.2 Cost Burden by Tenure and Income

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." Low-income residents are the most impacted by high housing costs and experience the highest rates of cost burden. Spending such large portions of their income on housing puts low-income households at higher risk of displacement, eviction, or homelessness.

Figure 2-31. Cost Burden by Tenure

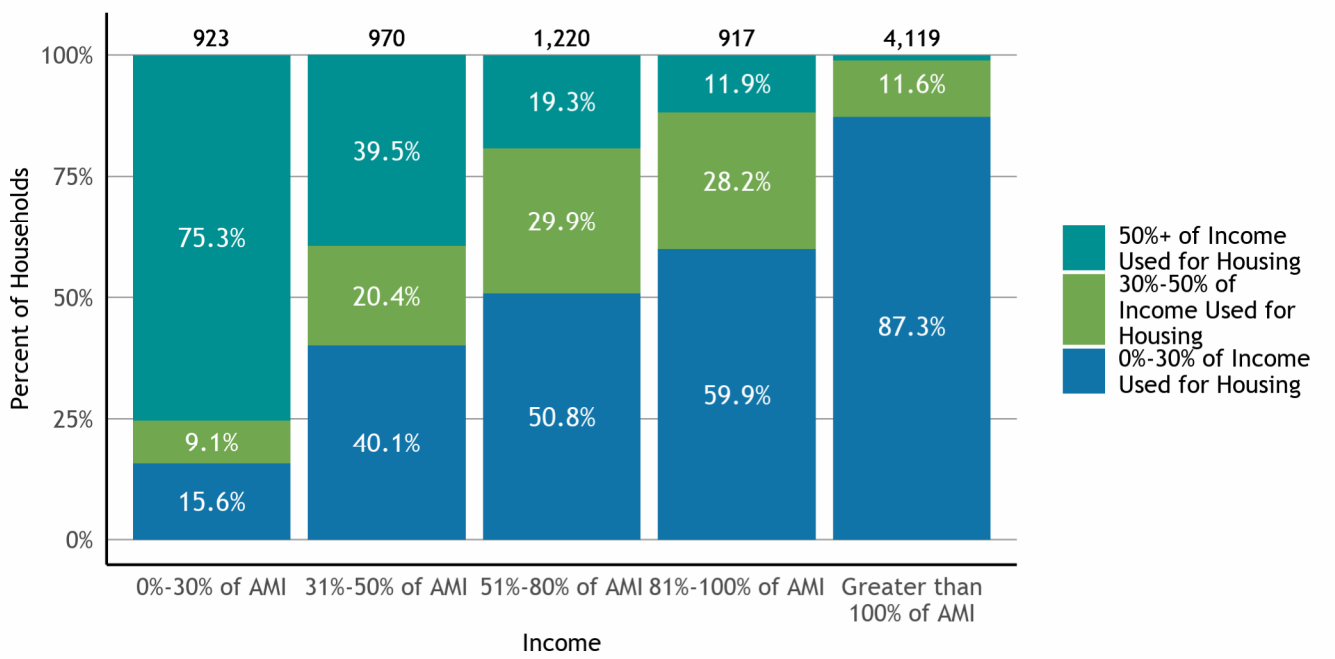


Source: *U.S. Census Bureau, ACS 5-Year Data (2015-2019), Table B25070, B25091*

Renters are often more cost-burdened than owners. 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 market increases. When looking at the cost burden across tenure in Millbrae, 19% of renters spend 30% to 50% of their income on housing compared to 17.9% of those who own (see Figure 2-31, Cost Burden by Tenure). Additionally, 21.9% of renters spend 50% or more of their income on housing, while 16.4% of owners are severely cost-burdened.

In Millbrae, 18% of households spend 50% or more of their income on housing, while 17% spend 30% to 50%. However, these rates vary greatly across income categories (see Figure 2-32, Cost Burden by Income Level). For example, 75.3% of Millbrae households making less than 30% of AMI spend the majority of their income on housing. For Millbrae residents making more than 100% of AMI, just 1.1% are severely cost-burdened, and 87.3% of those making more than 100% of AMI spend less than 30% of their income on housing.

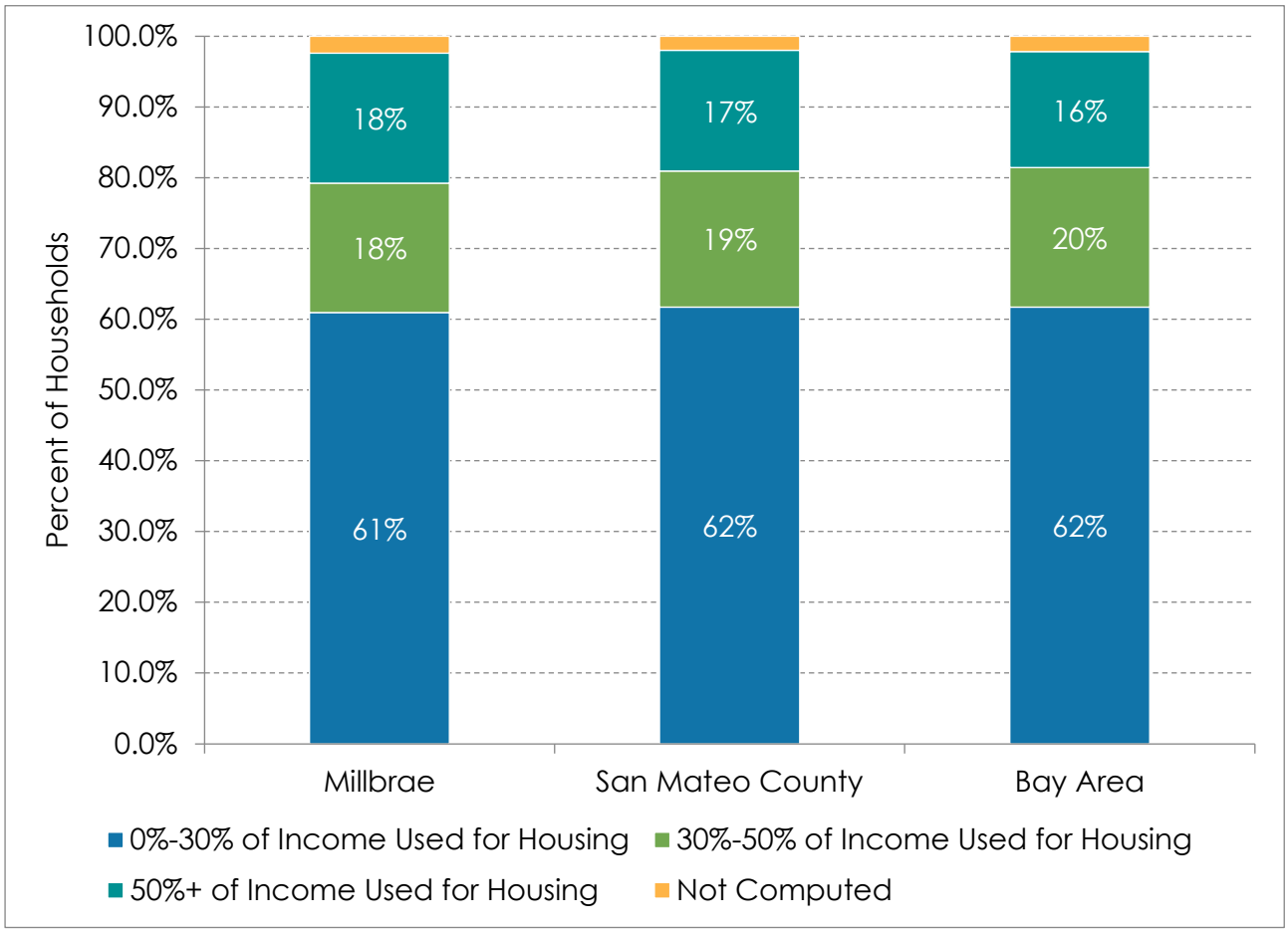
Figure 2-32. Cost Burden by Income Level



Source: *HUD, CHAS ACS tabulation, 2013-2017 release*

Compared to the County and Bay Area as a whole, the City has similar percentages of households that are cost-burdened (18–20%) and severely cost-burdened (16-18%) (Figure 2-33, Cost Burden Severity).

Figure 2-33. Cost Burden Severity

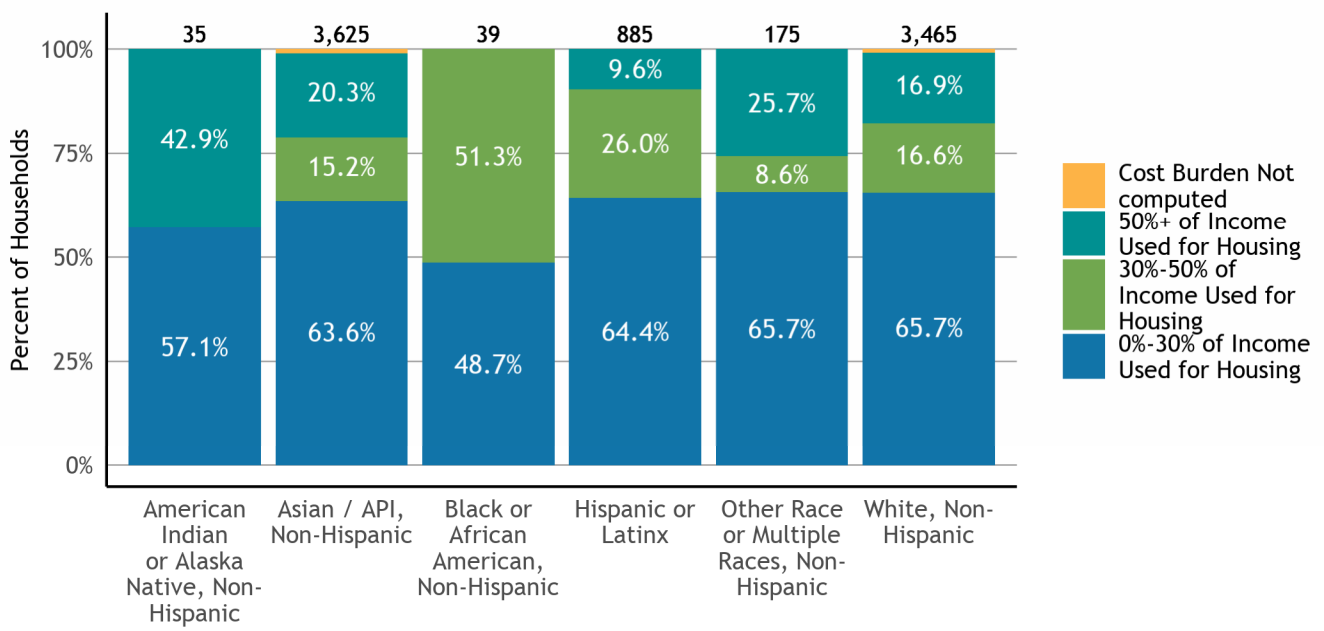


Source: *U.S. Census Bureau, ACS 5-Year Data (2015-2019), Table B25070, B25091*

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.

Black or African American, Non-Hispanic residents are the most cost-burdened with *51.3%* spending 30% to 50% of their income on housing, and *American Indian or Alaska Native, Non-Hispanic* residents are the most severely cost-burdened with *42.9%* spending more than 50% of their income on housing (see Figure 2-34, Cost Burden by Race).

Figure 2-34. Cost Burden by Race

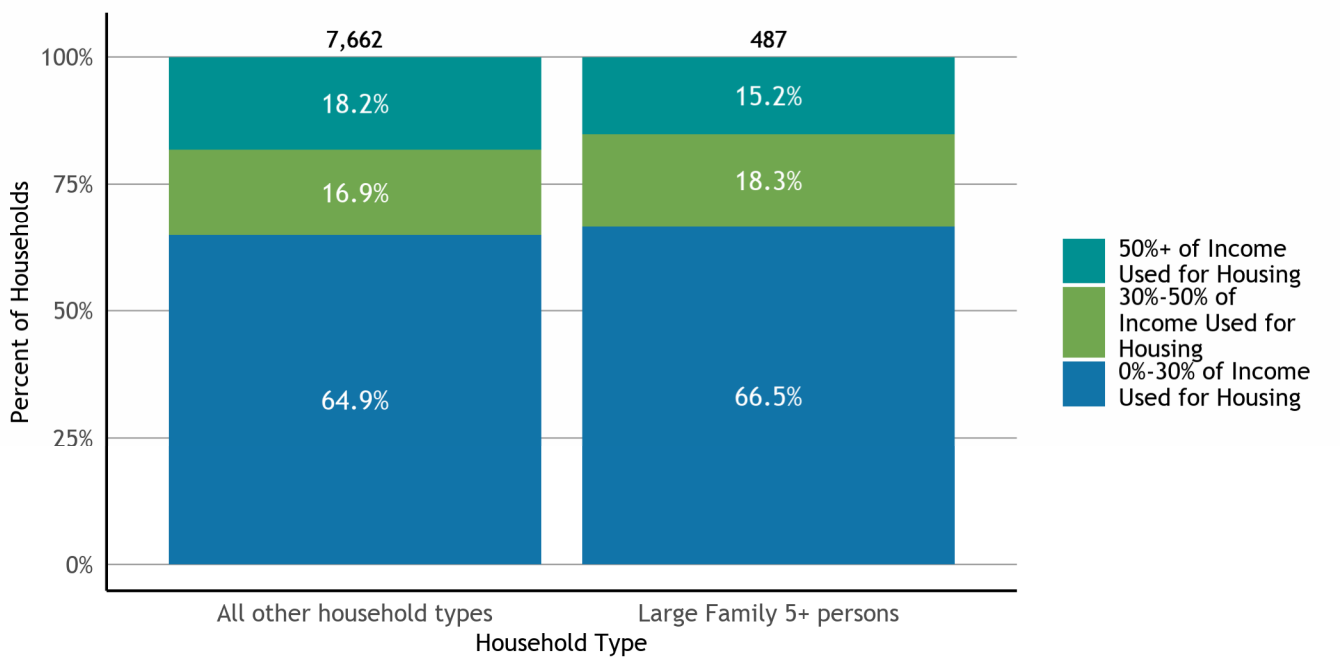


Source: *HUD, CHAS ACS tabulation, 2013-2017 release*

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 Millbrae, 18.3% of large-family households experience a cost burden of 30%-50%, while 15.2% of households spend more than half of their income on housing. Some 16.9% of all other households have a cost burden of 30%-50%, with 18.2% of households spending more than 50% of their income on housing (see Figure 2-35, Cost Burden by Household Size).

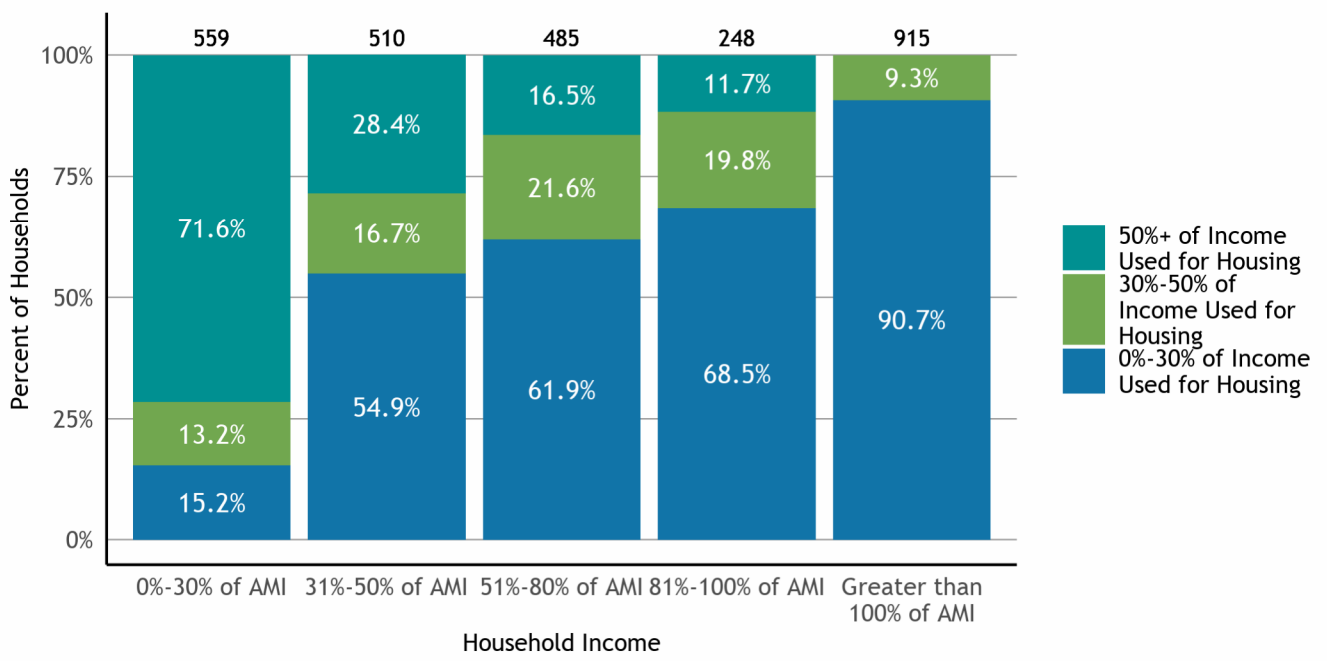
Figure 2-35. Cost Burden by Household Size



Source: *HUD, CHAS ACS tabulation, 2013-2017 release*

When cost-burdened seniors are no longer able to make house payments or pay rent, 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. 71.6% 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, 90.7% are not cost-burdened and spend less than 30% of their income on housing (see Figure 2-36, Cost-Burdened Senior Households by Income Level).

Figure 2-36. Cost-Burdened Senior Households by Income Level



Source: *HUD, CHAS ACS tabulation, 2013-2017 release*

2.6.8.3 Spending on Rent

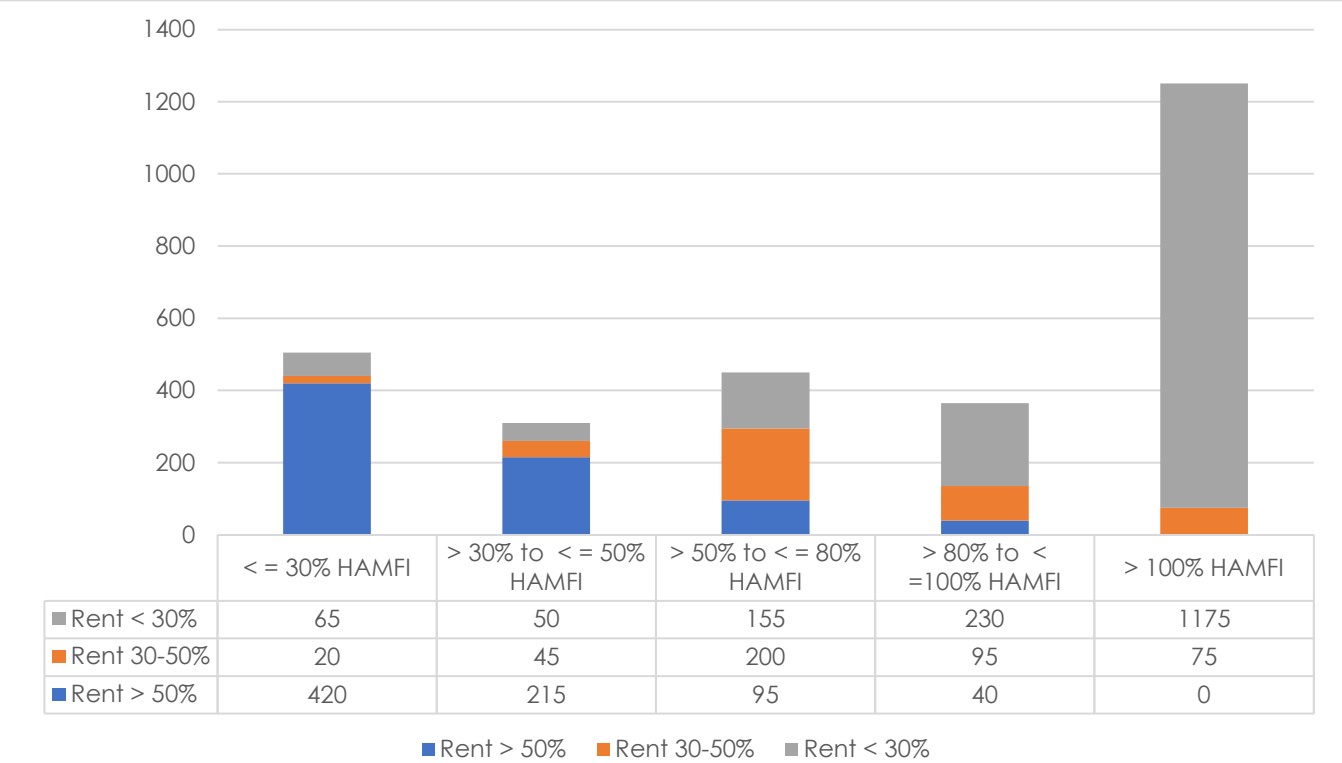
As mentioned in Section 2.6.6, Home and Rent Values, renters in Millbrae pay a median contract rent of $3,479, while renters in the Bay Area and County pay $3,081 and $3,262, respectively[17]. In addition, Figure 2-31 shows that 40.9% of Millbrae's renter households are cost-burdened. These significant cost burden rates, paired with some of the highest median rents in the area, point to a need for affordable rental housing in the City.

Spending on Rent by Income

Another method to analyze the extent of rent-burdened households in the City is to examine rent expenditure by income bracket. The Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation of renter households (i.e., the 2,880 renter households in the City where income data is available) shows the general trend of lower-income households spending a higher share of income on housing (i.e., more than 50%), while higher-income households are more likely to spend less than 30% of income on housing costs (Figure 2-37, Spending on Rent by Income).

[17] Median rents are based on the Zillow Observed Rent Index. Median rents provided represent 2022 estimates.

Figure 2-37. Spending on Rent by Income



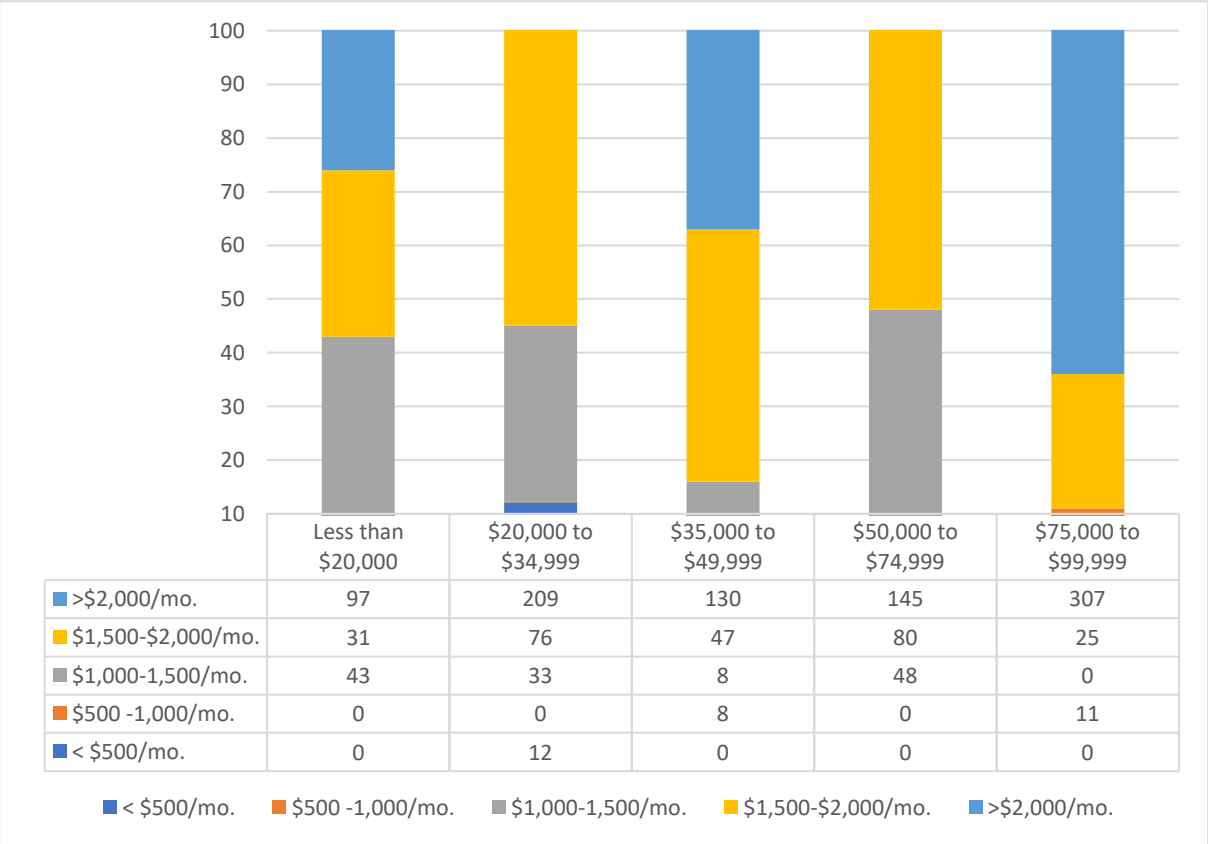
	< = 30% HAMFI	> 30% to < = 50% HAMFI	> 50% to < = 80% HAMFI	> 80% to < =100% HAMFI	> 100% HAMFI
Rent < 30%	65	50	155	230	1175
Rent 30-50%	20	45	200	95	75
Rent > 50%	420	215	95	40	0

Source: CHAS ACS tabulation, 2015–2019 release.

Household Income by (Cash) Rent

Analyzing the cash rent paid by household income also provides insight into the extent of the cost burden on renter households. The 2015–2019 ACS 5-Year Data indicates a general trend of households paying higher rents across the board. As shown in Figure 2-38, Household Income by (Cash) Rent, rent categories range from less than $500 per month (1% of Millbrae renters) to over $2,000 per month (68% of Millbrae renters).

Figure 2-38. Household Income by (Cash) Rent



	Less than $20,000	$20,000 to $34,999	$35,000 to $49,999	$50,000 to $74,999	$75,000 to $99,999
>$2,000/mo.	97	209	130	145	307
$1,500-$2,000/mo.	31	76	47	80	25
$1,000-1,500/mo.	43	33	8	48	0
$500 -1,000/mo.	0	0	8	0	11
< $500/mo.	0	12	0	0	0

Source: U.S. Census Bureau, CHAS ACS tabulation, 2015–2019 release, Table B25122.

Higher-income households can spend more on rent comfortably, as expenses on essential items become a smaller share of spending income. Nevertheless, Figure 2-38 shows that the majority of households at all income levels spend over $1,500 on rent. Furthermore, a greater number of households with incomes greater than $35,000 pay over $2,000. The development of affordable housing would address the need for rents that are affordable to lower-income families and reduce the number of cost-burdened and severely cost-burdened households.

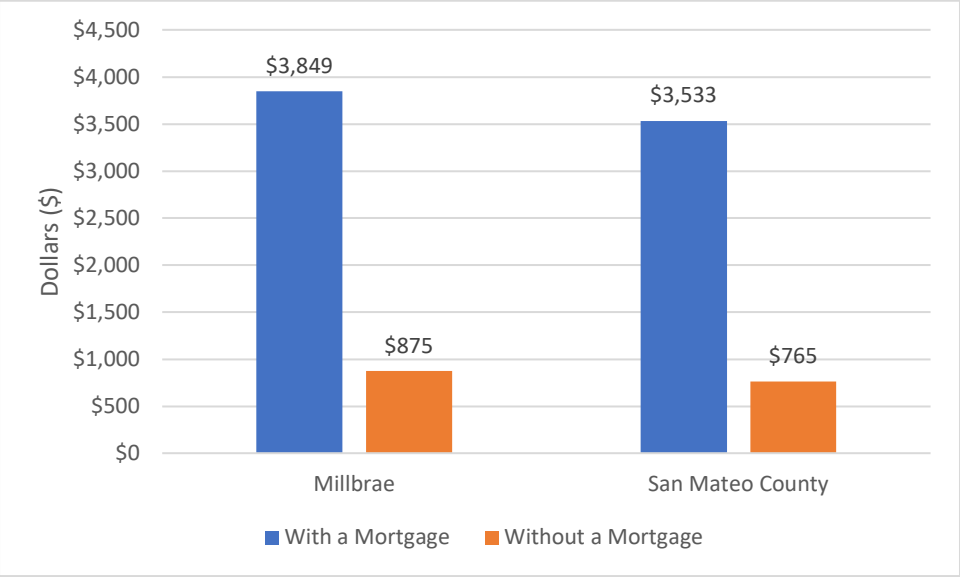
2.6.8.4 Spending on Mortgage

The housing costs of an owner-occupied unit will significantly decrease when a mortgage on the unit is paid in full, thereby making the unit more affordable. However, while a mortgage is being paid by the homeowner, monthly housing costs can represent a cost burden, particularly for retiree households, which are typically on a somewhat fixed income. Increases in other required expenses, such as healthcare, food, and home maintenance, can exacerbate this situation.

As previously illustrated in Figure 2-31, 34.3% of Millbrae homeowners are cost-burdened. This could be explained by the fact that Millbrae homeowners with a mortgage pay a median of $3,849 in housing costs (See Figure 2-39, Median Owner Costs). While the percentage of cost-

burdened homeowners in the City (34.3%) is lower than that of renters (40.9%), Millbrae is principally made up of owner-occupied households, making the 30% of cost-burdened homeowners a significant number.

Figure 2-39. Median Owner Costs



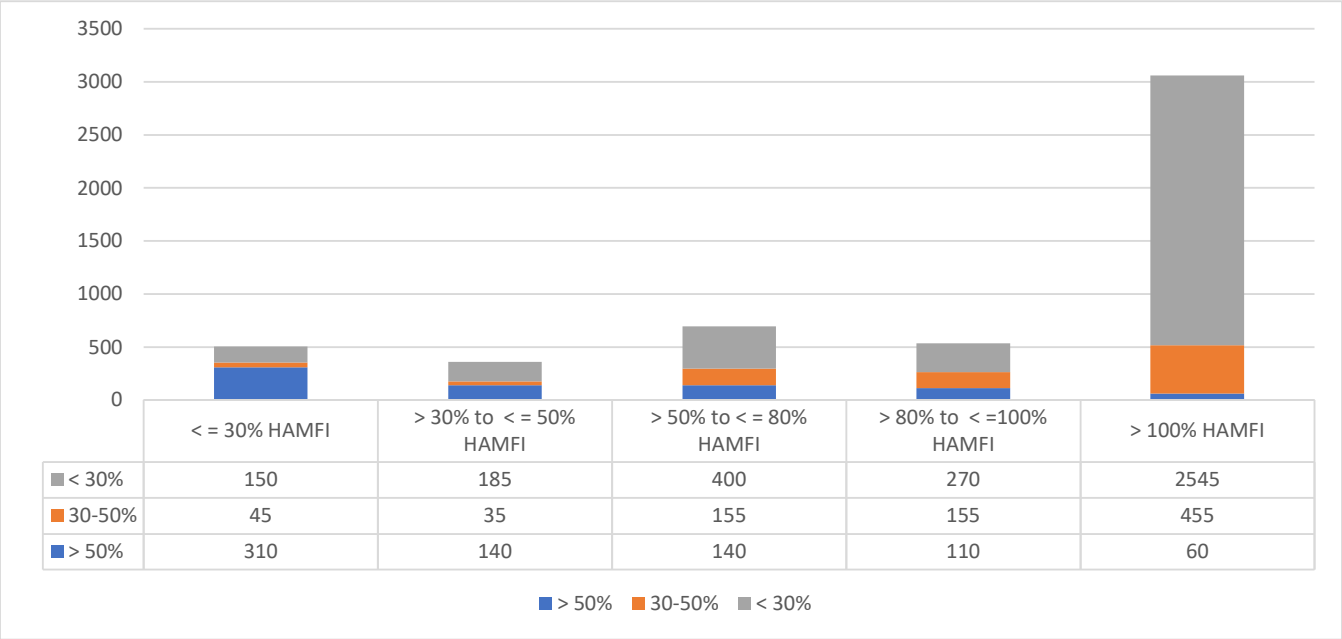
Source: U.S. Census Bureau, ACS 5-Year Data (2015–2019), Table B25088.

Costs for Mortgage Holders by Income

The CHAS data on mortgage-holding households in the City (by income and the percentage of income spent on mortgage costs) indicates that lower-income households spend a higher share of income on housing costs, while higher-income households spend a lower share of income on housing costs.

Approximately 83% of Millbrae mortgage-holding, above median-income households, have payments that make up less than 30% of household income, while only 17% of the same households have payments that exceed 30% of income (Figure 2-40, Monthly Owner Costs for Mortgage Holders). As expected, the cost burden is more common at lower-income levels. For example, compared to the 17% of mortgage-holding, above median-income households with a cost burden, 70% of mortgage-holding, extremely low-income households have a cost burden.

Figure 2-40. Monthly Owner Costs for Mortgage Holders



	< = 30% HAMFI	> 30% to < = 50% HAMFI	> 50% to < = 80% HAMFI	> 80% to < =100% HAMFI	> 100% HAMFI
< 30%	150	185	400	270	2545
30-50%	45	35	155	155	455
> 50%	310	140	140	110	60

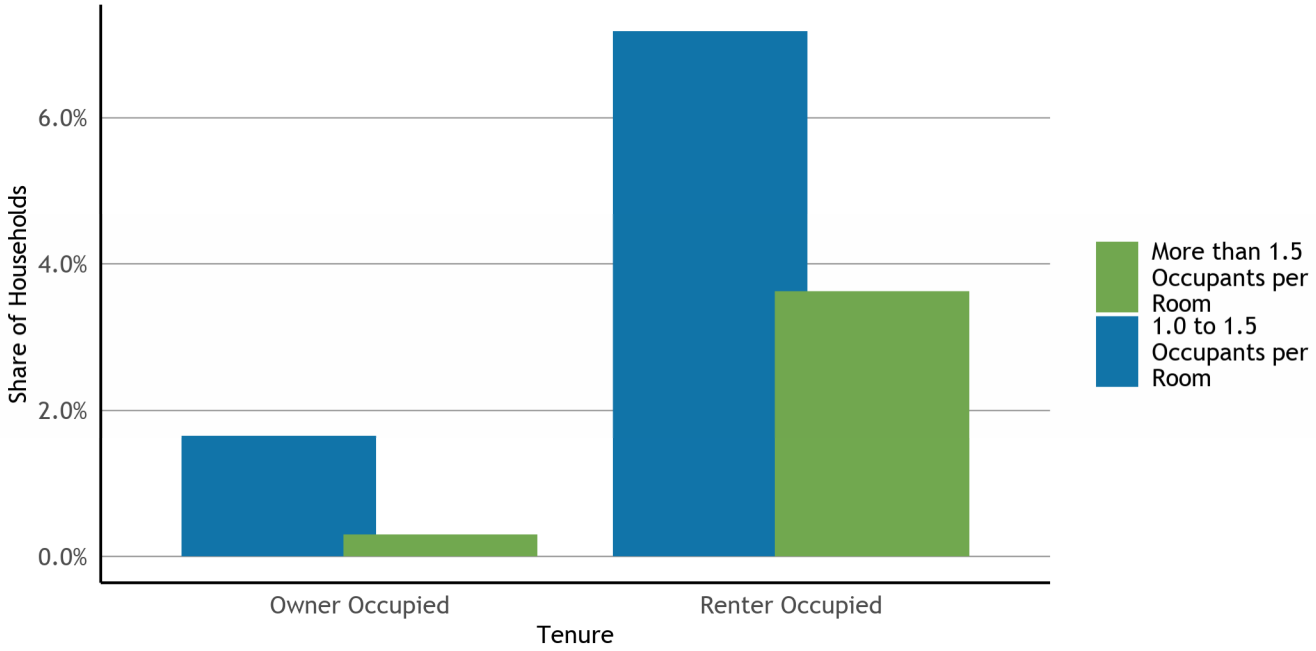
Source: CHAS ACS tabulation, 2015–2019 release.

2.6.8.5 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 Bureau considers units with more than 1.5 occupants per room to be severely overcrowded.

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 who are renting, with multiple households sharing a unit to make it possible to stay in their communities. In Millbrae, 3.6% of households that rent are severely overcrowded (more than 1.5 occupants per room), compared to 0.3% of households that own (see Figure 2-41, Overcrowding by Tenure and Severity). In Millbrae, 7.2% of renters experience moderate overcrowding (1 to 1.5 occupants per room), compared to 1.7% for those who own.

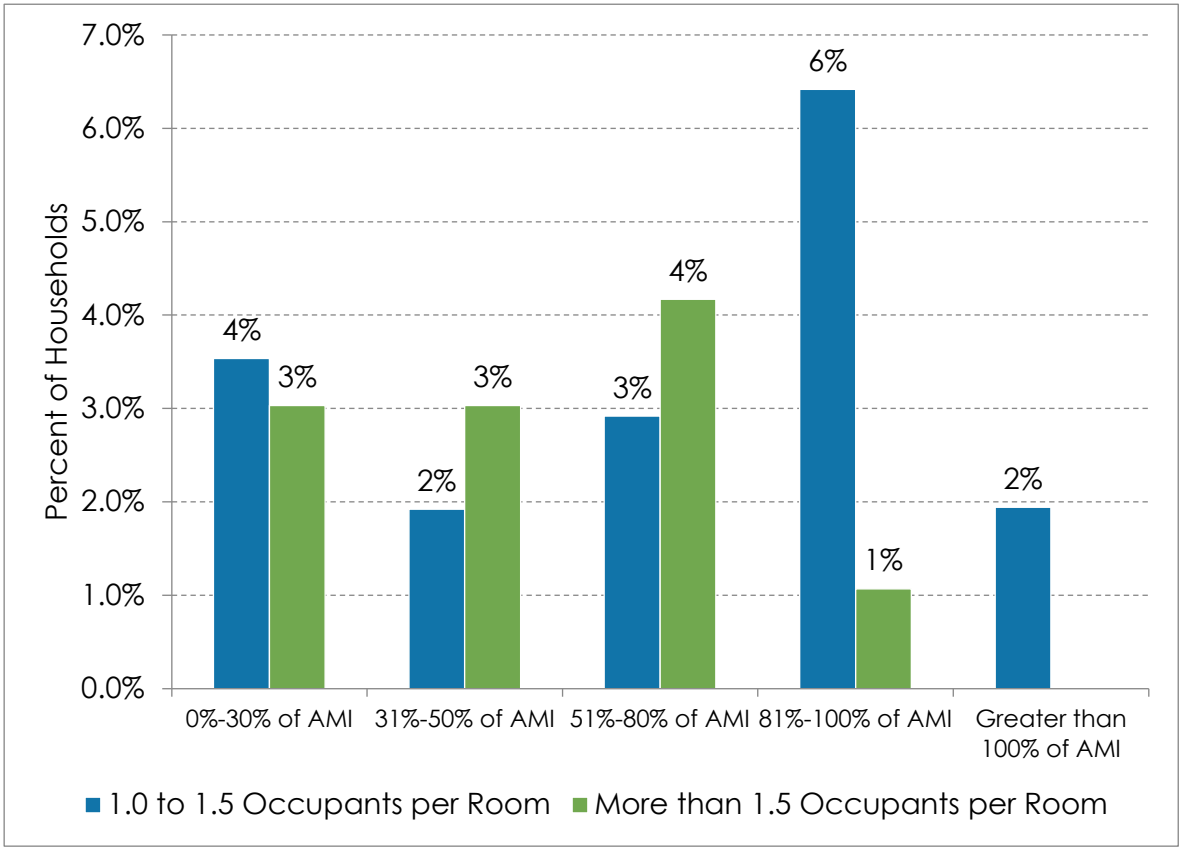
Figure 2-41. Overcrowding by Tenure and Severity



Source: *HUD, CHAS ACS tabulation, 2013-2017 release*

Overcrowding often disproportionately impacts low-income households. 6% of very low-income households (below 50% AMI) experience severe overcrowding, while 0% of households above 100% experience this level of overcrowding (see Figure 2-42, Overcrowding by Income Level and Severity).

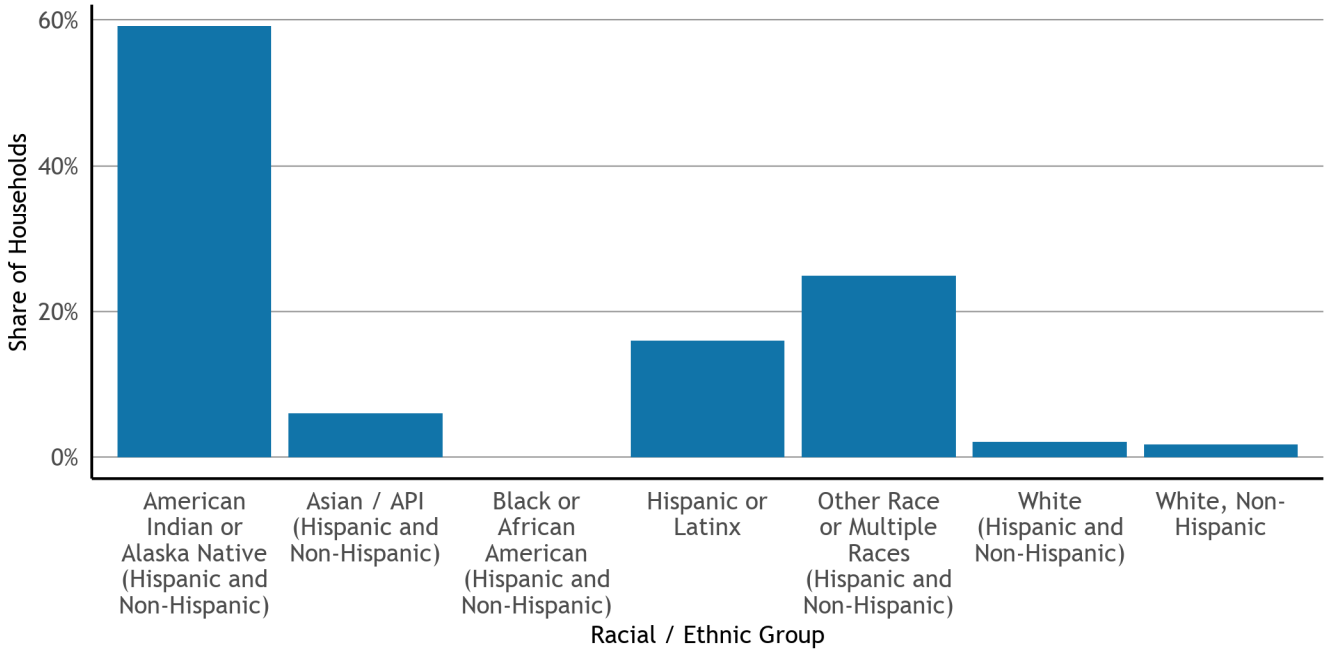
Figure 2-42. Overcrowding by Income Level and Severity



Source: *HUD, CHAS ACS tabulation, 2013-2017 release*

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 Millbrae, the racial group with the largest overcrowding rate is *American Indian or Alaska Native (Hispanic and Non-Hispanic)* (see Figure 2-43, Overcrowding by Race)

Figure 2-43. Overcrowding by Race



Source: *U.S. Census Bureau, ACS 5-Year Data (2015-2019), Table B25014*

2.7 Displacement

Because of increasing housing prices, displacement is a major concern in the Bay Area. Displacement has the most severe impacts on low- and moderate-income residents. When individuals or families are forced to leave their homes and communities, they also lose their support network.

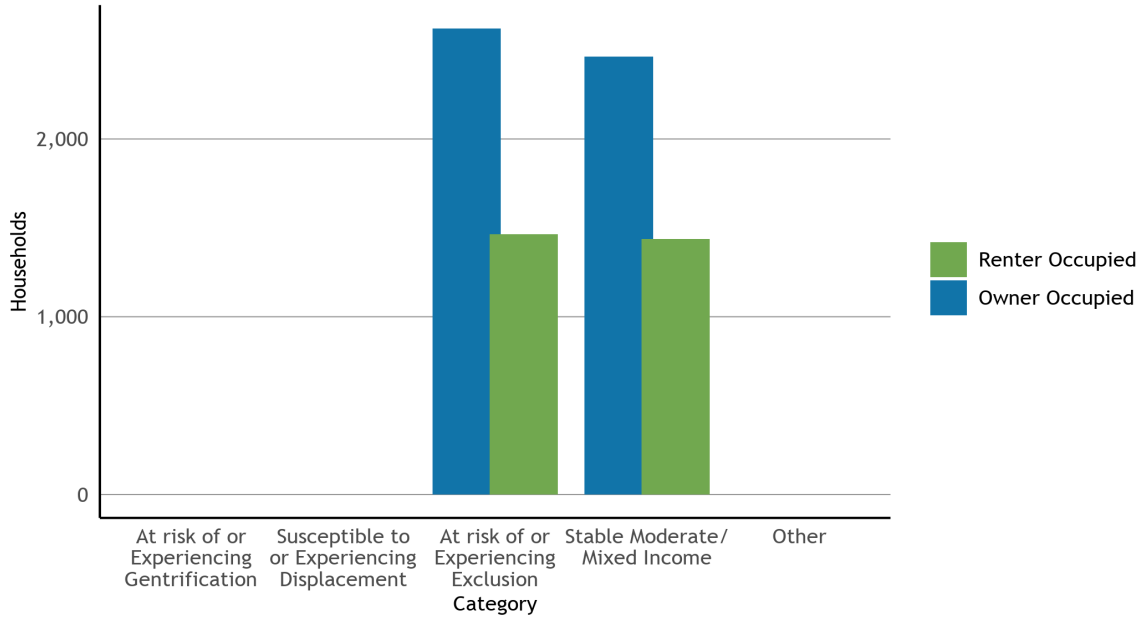
The University of California, Berkeley has mapped all neighborhoods in the Bay area, identifying their risk for gentrification. They find that in Millbrae, 0% of households live in neighborhoods that are susceptible to or experiencing displacement, and 0% live in neighborhoods at risk of or undergoing gentrification.

Equally important, some neighborhoods in the Bay Area do not have housing appropriate for a broad section of the workforce. The University of California, Berkeley estimates that 51.1% of households in Millbrae live in neighborhoods where low-income households are likely to be excluded due to prohibitive housing costs.[18]

[18] More information about this gentrification and displacement data is available at the Urban Displacement Project's webpage: https://www.urbandisplacement.org/. Specifically, one can learn more about the different gentrification/displacement typologies shown in Figure 18 at this link: https://www.urbandisplacement.org/sites/default/files/typology_sheet_2018_0.png. Additionally, one can view maps that show which typologies correspond to which parts of a jurisdiction here: https://www.urbandisplacement.org/san-francisco/sf-bay-area-gentrification-and-displacement

As shown by Figure 2-44, Households by Displacement Risk and Tenure, despite owner-occupied households identifying as stable moderate/mixed-income households, nearly double that of renter-occupied households, owner-occupied households were also at risk of experiencing exclusion at nearly double the rate of renter-occupied households.

Figure 2-44. Households by Displacement Risk and Tenure



Source: *Urban Displacement Project for classification, ACS 5-Year Data (2015-2019), Table B25003 for tenure.*

2.7.1 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.

It is important to note that there are no affordable housing units in the City at risk of converting to market-rate units over the next 10 years. There are 26 affordable housing units, but they are not due to expire for more than 20 years. California Housing Partnership tracks affordable housing units and as shown in the Affirmative Furthering Fair Housing section (Appendix B), there are 26 affordable and assisted units in the City. However, these units are not at risk of converting to market-rate units over the next 10 years. California Housing Partnership lists the inventory of affordable units and does not specify when units expire in terms of housing element cycles. Units shown at “low risk” of converting to market rate are essentially designated as those units that will remain affordable for a long period.

2.8 Extremely Low-Income Households

HCD defines extremely low-income as households with income less than 30% of AMI. According to the HCD "Revised State Income Limits for 2021" letter dated December 31, 2021, the 2021 AMI in San Mateo County is $149,600. For extremely low-income households, this results in an income of $54,800 or less for a four-person household or $38,400 or less for a one-person household. Extremely low-income households experience a variety of needs, such as a need for public assistance like social security insurance or disability insurance. The majority of households receiving such public assistance are often considered to be extremely low-income. At the same time, a worker with an annual income of approximately $72,350 or less could be part of an extremely low-income household, depending on their household size.

2.8.1 Existing Needs

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, and the Bay Area has the highest income inequality between high- and low-income households in the State.[19]

2.8.1.1 Household Income

According to the 2013-2017 CHAS ACS tabulation, there are 8,214 households residing in Millbrae. Of the total households, 50.2% make more than 100% of the AMI[20], compared to **12% making less than 30% of the AMI** (extremely low-income households). Generally, Millbrae, San Mateo County, and the Bay Area have similar household income distributions by income level (see Figure 2-45, Households by Household Income Level).

Regionally, more than half of all households (2,701,033 total households) make more than 100% AMI, while 15% make less than 30% AMI. In San Mateo County, 30% AMI is equivalent to an annual income of $44,000 for a family of four. Many households with multiple wage earners – including food service workers, full-time students, teachers, farm workers, and healthcare professionals – can fall into lower AMI categories due to relatively stagnant wages in many industries.

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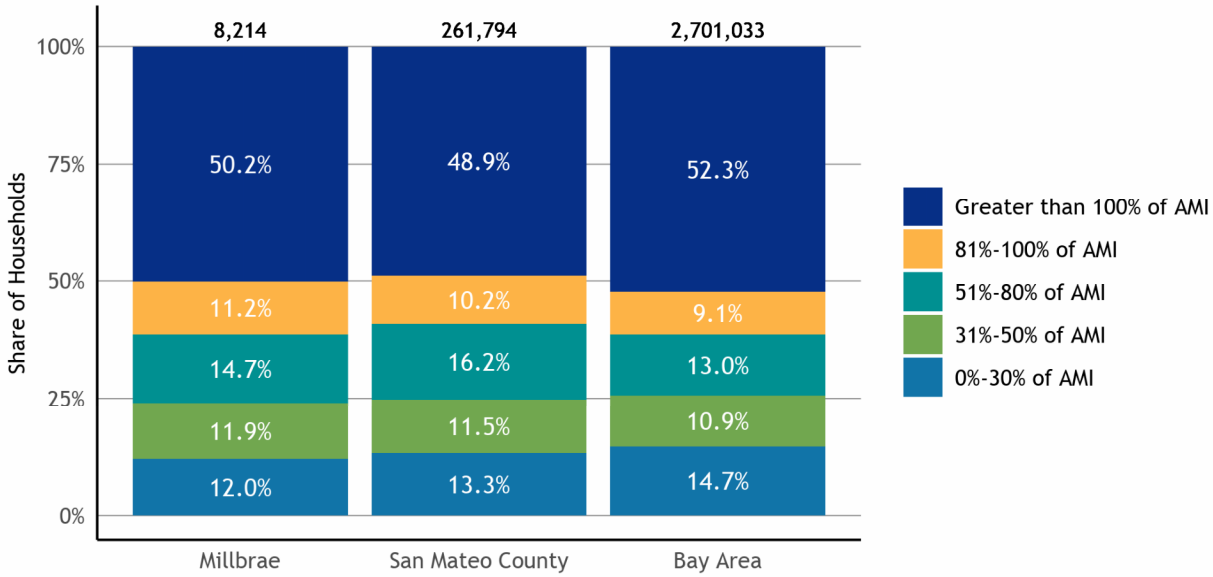
[19] Bohn, S.et al. 2020. Income Inequality and Economic Opportunity in California. *Public Policy Institute of California*.

[20] Income groups are based on HUD calculations for AMI. HUD calculates the AMI for different metropolitan areas, and the nine county Bay Area includes the following metropolitan areas: Napa Metro Area (Napa County), Oakland-Fremont Metro Area (Alameda and Contra Costa Counties), San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties), San Jose-Sunnyvale-Santa Clara Metro Area (Santa Clara County), Santa Rosa Metro Area (Sonoma County), and Vallejo-Fairfield Metro Area (Solano County). The 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% are extremely low-income. This is then adjusted for household size.

Figure 2-45. Households by Household Income Level



Source: *HUD, Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release*

2.8.1.2 Cost Burden

In Millbrae, 18% of households spend 50% or more of their income on housing, while 17% spend 30% to 50%. However, these rates vary greatly across income categories (see Figure 2-32, Cost Burden by Income Level). **Of the existing 987 extremely low-income households in the City, 75.3% (or 742) are severely cost-burdened (spend 50% or more of their income on housing costs) and 9.1% (or 90) are cost-burdened (spend 30% - 50% of their income on housing costs), creating a need for 832 units affordable to extremely low-income households.** Contrastingly, residents making more than 100% of AMI hardly experience housing cost burden with only 1.1% of these households experiencing severe cost burden. On the other hand, 87.3% of households making more than 100% of AMI spend less than 30% of their income on housing.

Compared to the County and Bay Area, the City has similar percentages of cost-burdened (18-20%) and severely cost-burdened (16-18%) households (see Figure 2-33, Cost Burden Severity)

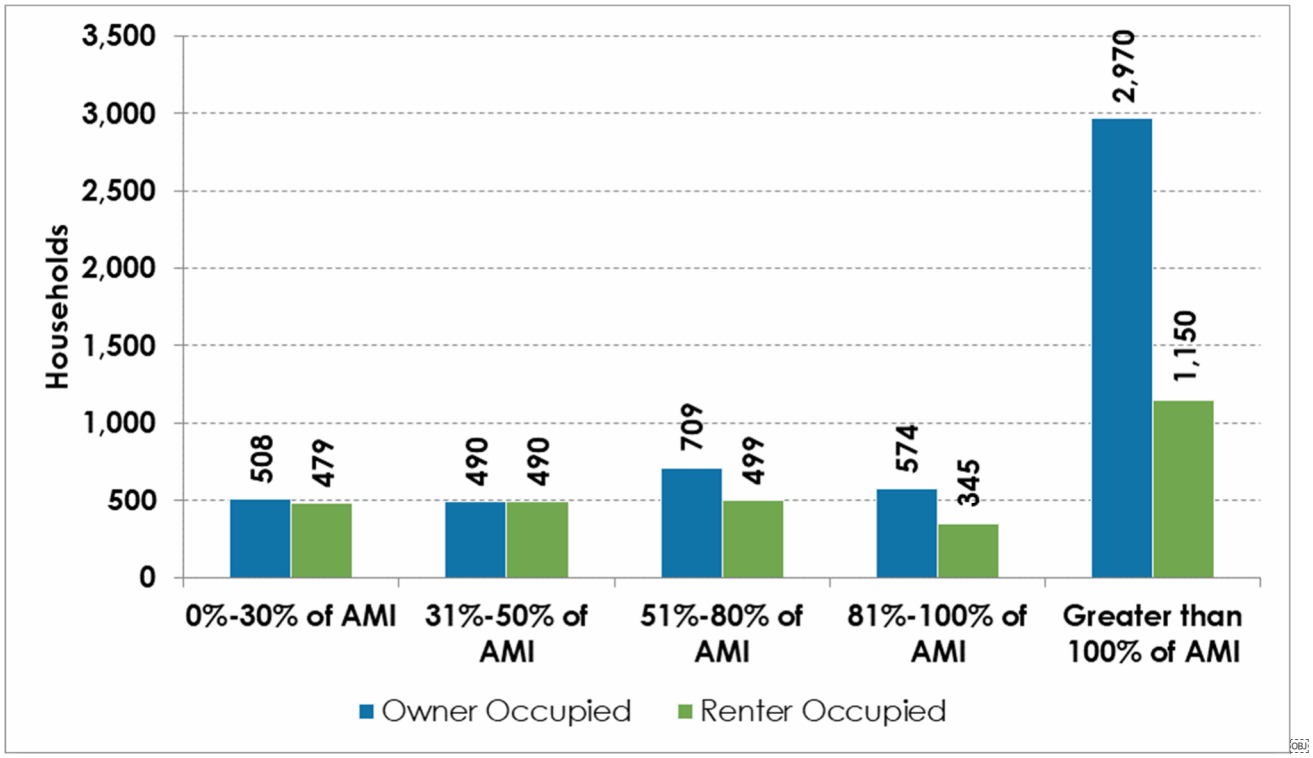
2.8.1.3 Tenure

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.

In Millbrae, the largest proportion of both renters and homeowners falls in the above-moderate (households with incomes above 100% of AMI) income group (see Figure 2-46, Household Income Level by Tenure).

As shown in Figure 2-46, extremely low-income households in Millbrae are fairly equally split between owners and renters. A significant disparity is not seen until the AMI reaches 51-80%, with the greatest disparity happening for above moderate-income households (those with a household income greater than 100% of the AMI).

Figure 2-46. Household Income Level by Tenure



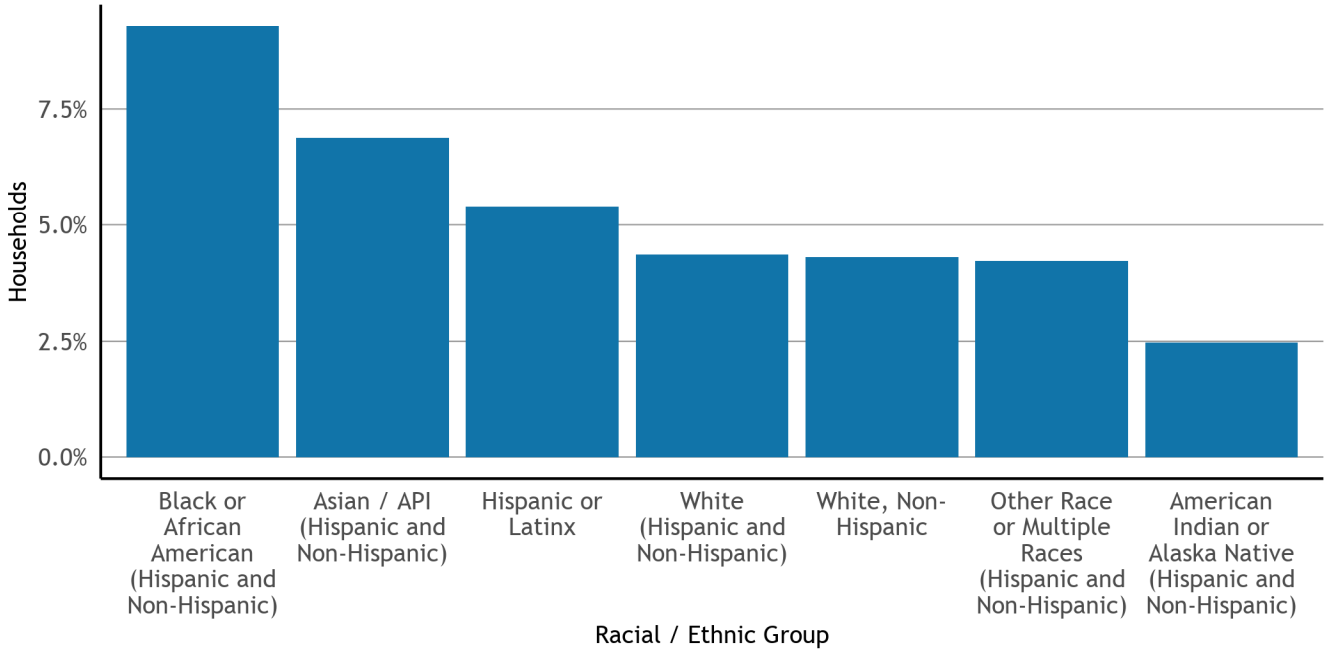
Source: *HUD, CHAS ACS tabulation, 2013-2017 release*

2.8.1.4 Race

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.[21] These economic disparities also leave communities of color at higher risk for housing insecurity, displacement, or homelessness. In Millbrae, **Black or African American (Hispanic and Non-Hispanic) residents experience the highest rates of poverty, followed by Asian / API (Hispanic and Non-Hispanic) residents** (see Figure 2-47, Poverty Status by Race).

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

Figure 2-47. Poverty Status by Race



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

2.8.1.5 Overcrowding

Overcrowding often impacts low-income households disproportionately. Generally, Millbrae's households experience a low percentage of overcrowding. As shown in Figure 2-42, Overcrowding by Income Level and Severity, **7% (or 69 of the total 987 extremely low-income households) experience some level of overcrowding**.

2.8.2 Existing Resources

Millbrae currently has a number of existing programs and services available to extremely low-income households. These services are outlined in Table 2-11 in Section 2.9.8.

In addition, the San Mateo County Consolidated Action Plan includes the following goals to address any gaps in housing and services for extremely low-income households:

- Continue to support the development of publicly supported housing for Extremely Low-Income Households.
- Support the acquisition, creation, rehabilitation, and preservation of affordable housing units, including the adaptive reuse of non-housing structures for use as affordable housing.
- Support public services, including shelter operations, rapid re-housing, and shelter diversion, which address the goals of the County's plan to prevent and end homelessness.

- Support public facilities, including emergency shelters and supportive housing facilities, that address County goals to prevent and end homelessness.

Furthermore, **there are zero deed-restricted units affordable to extremely low-income households.** However, the City approved two high-density multifamily developments, which included very low-income units. These developments included the following:

- **Site 6 - 1100 El Camino Real (APN 021-324-320):** the El Rancho Inn Redevelopment project was approved in 2022 and includes 384 residential units, of which 19 (5%) are affordable to very low-income households. The site will replace a motel and eight residential units for a net total of 376 residential units. Program HIP-13 in the Housing Plan will address the replacement of the eight units.
- **Site 8 - 959 El Camino Real (APN 021-364-080):** 959 El Camino Real was approved in 2022 and includes 278 units, of which 26 (9.6%) are affordable to very low-income households.

2.8.3 Projected Needs

Through the analysis of existing needs for extremely low-income households, the City learned the following:

- Extremely low-income households make up 12% (or 987) of the total households.
- Millbrae's household income distribution by income level is similar to those of the County and the Bay Area (See Figure 2-45), with extremely low-income households ranging from 12% (Millbrae) to 15% (Bay Area).
- 9.1% of extremely low-income households are cost-burdened and 75.3% are severely cost-burdened.
- 508 owner-occupied units and 479 renter-occupied units make up the total extremely low-income households in the City, indicating a similar number of households per tenure.
- Black residents experience the highest rates of poverty, followed by Asian residents.
- 7% (or 69 of the total 987 extremely low-income households) experience some level of overcrowding.

This analysis of existing needs helps the City prioritize and effectively manage existing and future programs. For instance, there is a significant disparity in cost burden between extremely low-income and above moderate-income households. As such, **of the existing 987 extremely low-income households in the City, 75.3% (or 742) are severely cost-burdened (spend 50% or more of their income on housing costs) and 9.1% (or 90) are cost-burdened (spend 30% - 50% of their income on housing costs), creating a need for 832 units affordable to**

extremely low-income households. Meanwhile, 11.6% of those above moderate-income are cost-burdened and 1.1% are severely cost-burdened. While it can be expected that extremely low-income households are cost-burdened, a significant majority spend over 50% of their income on housing costs. **This data points to the need for housing units at deeper affordability levels.**

Based on guidance provided by HCD via communications with their staff, the City calculated the projected housing needs required to address extremely low-income households by assuming 50% of its very low-income RHNA (575) are extremely low-income households, or 288 units. **Because there are zero deed-restricted, extremely low-income units in the City, the projected 288 new units and the existing 832 cost-burdened households make up a gap of 1,120 extremely low-income units.** Many extremely low-income households will be seeking rental housing, and most will likely face an overpayment. Furthermore, many extremely low-income households will be occupied by those who fall under a special needs housing category as identified in the section titled "Special Housing Needs."

To address the housing needs of extremely low-income households, Millbrae has identified several initiatives to help expand affordable housing opportunities and decrease the affordability gap for low-income households. These include the following programs from the Housing Plan (Chapter 8, Housing Plan, of this Housing Element) focused on lower-income housing development (including extremely low-income housing units):

- **HIP-1.** Triennial Advocacy Meeting with Affordable Housing Property Owners/Managers, Fair Housing Providers, Service Providers, Housing Advocates, and Non-Profits
- **HIP-20.** BMR Eligibility Guidelines
- **HIP-23.** Prioritize Review and Expedite the Development of Affordable and Special Needs Projects
- **HIP-31.** Pursue State and Federal Funding for Affordable Housing
- **HIP-32.** Local Funding for Affordable Housing
- **HIP-36.** Funding, Incentives, and Concessions for Extremely Low-Income Developments

As part of this effort, the City will follow the Housing Plan and collaborate with housing providers and stakeholders to meet the City's affordable housing needs. In addition, it is important to note that the State's efforts to encourage the development of affordable housing through density bonuses and inclusionary housing are making it possible for cities to provide more affordable housing. Millbrae, specifically, shall utilize both tools to continue to encourage the development of affordable housing, while focusing on extremely low-income housing.

2.9 Special Housing Needs

California Government Code Section 65583(a) requires an assessment of housing needs and an inventory of resources and constraints relevant to meeting these needs. Per California Government Code, Section 65583(a)(7), this section includes an analysis of special housing needs. This section details the needs of seniors, people with disabilities (including those with developmental disabilities), large families, farmworkers, families with female heads of households, and families and individuals in need of emergency shelter in the City. Studying these groups is an important component of identifying special housing needs and addressing those needs through plans, programs, and projects.

These specific segments of the population may have more difficulty finding decent, affordable housing due to special needs. Special circumstances may be related to one's employment and income, family characteristics, disability, and household characteristics, among other factors. Furthermore, many of these groups overlap. For example, many seniors have a disability, and many single mothers experience homelessness. Generally, these groups would be assisted by an increase in affordable housing, especially housing located near public transportation and services.

The City used the ABAG Housing Needs Data to identify special housing needs for the purposes of this 6th Cycle Housing Element. Finally, resources and services dedicated to serving special housing needs are derived from the City's available data. Appendix B, Affirmatively Furthering Fair Housing Analysis, also contains analysis related to special needs housing issues.

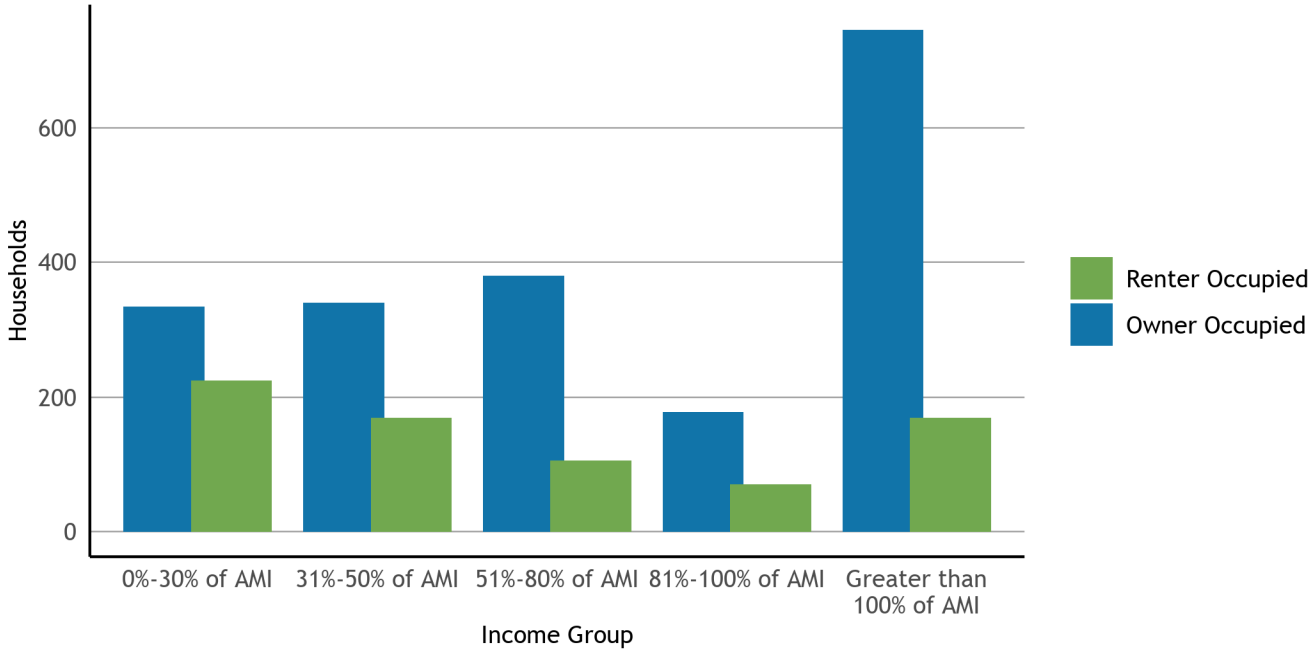
2.9.1 Seniors

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.

2.9.1.1 Needs Assessment for Seniors

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* (see Figure 2-48, Senior Households by Income and Tenure).

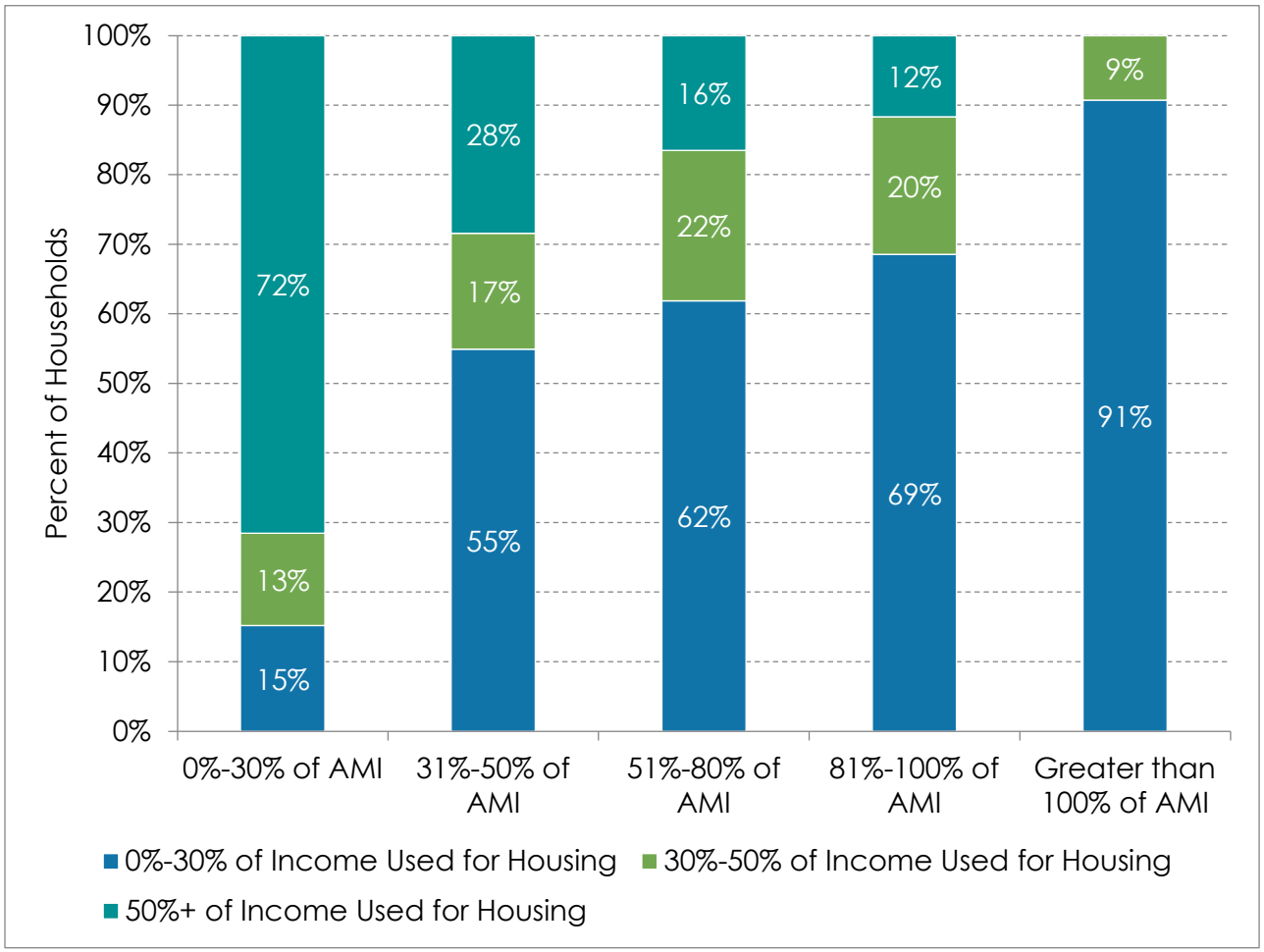
Figure 2-48. Senior Households by Income and Tenure



Source: *HUD, CHAS ACS tabulation, 2013-2017 release*

While a large portion of senior households in Millbrae have incomes above 80% of the AMI, it is important to recognize that 1,069 (or 39%) of senior renter households have incomes below 50% of the AMI, making very low-income senior renters a demographic in the City that should be considered when planning for housing. Furthermore, as shown in Figure 2-49, Cost-Burdened Senior Households by Income Level, 72% of seniors with incomes below 30% of the AMI spend more than 50% of their income on housing costs. In comparison, 91% of seniors with income above 100% of the AMI spend less than 30% of their income on housing costs. This illustrates an obvious disparity in cost burden between those with the lowest and highest incomes.

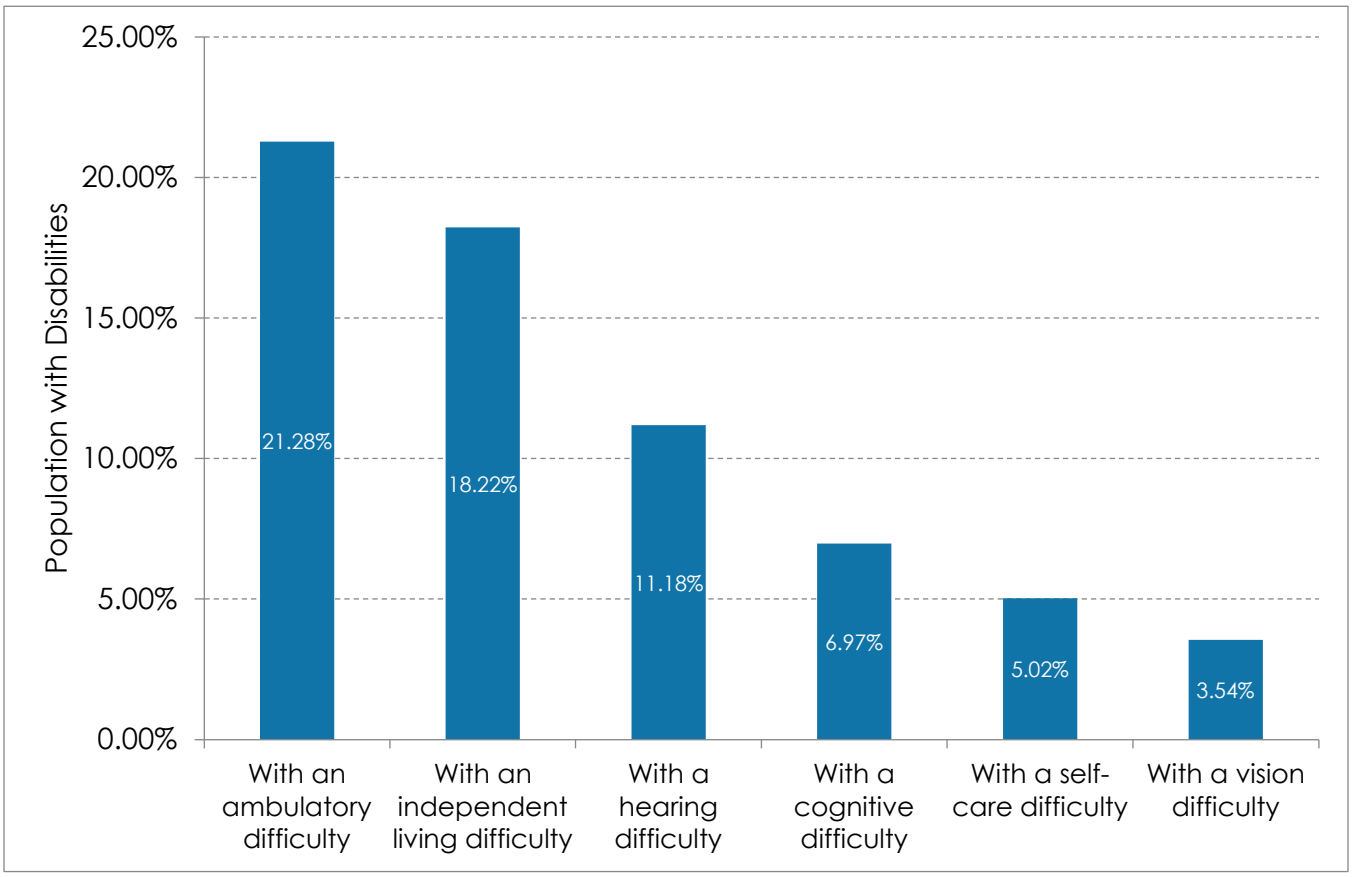
Figure 2-49. Cost-Burdened Senior Households by Income Level



Source: *HUD, CHAS ACS tabulation, 2013-2017 release*

Seniors typically have additional physical and social needs. As shown in Figure 2-50, Disability by Type – Seniors (Age 65 or Older), the most commonly occurring disability among seniors is an ambulatory disability, which 21% of seniors in the City experience. Ambulatory disabilities are those that result in serious difficulty walking or climbing stairs, which requires housing that is more accessible to transportation, in-house assistance, and housing options with more accessible accommodations.

Figure 2-50. Disability by Type – Seniors (Age 65 or Older)



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

In terms of housing, seniors typically require smaller, more affordable housing options and/or assistance with accessibility and home maintenance. Seniors often require ramps, handrails, and lower cupboards and counters to allow greater access and mobility for wheelchairs or walkers. Housing options that provide proximity to transportation assistance to shopping and medical facilities are often required for seniors with mobility issues.

2.9.1.2 Resources and Services for Seniors

Millbrae currently has a number of existing programs and services available to seniors. These services are outlined in Table 2-11, Special Housing Needs Resources, in Section 2.9.8, Special Housing Needs Resources.

Furthermore, the San Mateo County Consolidated Action Plan (that includes the City of Millbrae as a non-entitlement city) includes the following goal to address any gaps in senior housing and services:

- Support the acquisition, creation, rehabilitation, and preservation of affordable housing units, including the adaptive reuse of non-housing structures for use as affordable housing.

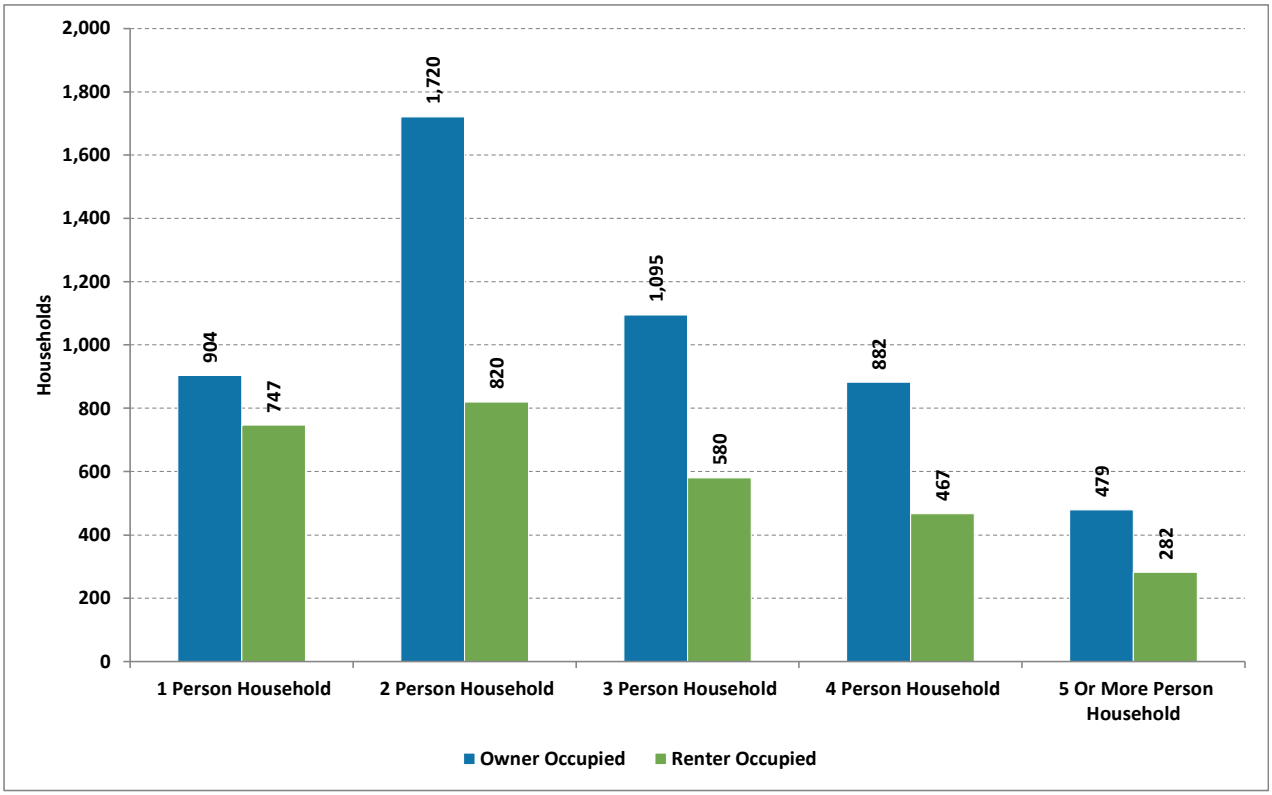
2.9.2 Large Households

Large households are identified in State housing law as a "group with special housing needs based on the generally limited availability of adequately sized, affordable housing units." Large households are defined as those with five or more members. Due to the limited supply of adequately sized units to accommodate large-family households, large families face an above-average level of difficulty in locating adequately sized, affordable housing. Even when larger units are available, the cost is generally higher than that of smaller units. The lack of supply, compounded with the low incomes of larger families, results in many large families living in overcrowded conditions.

2.9.2.1 Needs Assessment for Large Households

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 Millbrae, 761 (or 10%) households have five or more persons, of which 479 (or 62.9%) are owner-occupied (see Figure 2-51, Household Size by Tenure) and 282 (or 37.1%) are renter-occupied. In comparison to the City's 10%, San Mateo County and the Bay Area's large households make up 11% of the total number of households.

Figure 2-51. Household Size by Tenure



Source: *U.S. Census Bureau, ACS 5-Year Data (2015-2019), Table B25009*

There are 487 large households (households with five or more people) in the City. As shown in Table 2-6, Household Size by Household Income Level, 40 (or 8.2%) large households in Millbrae have a median income that falls below the 30% AMI. In addition, 22 (or 12.7%) of large households have a median household income that falls below the 50% AMI.

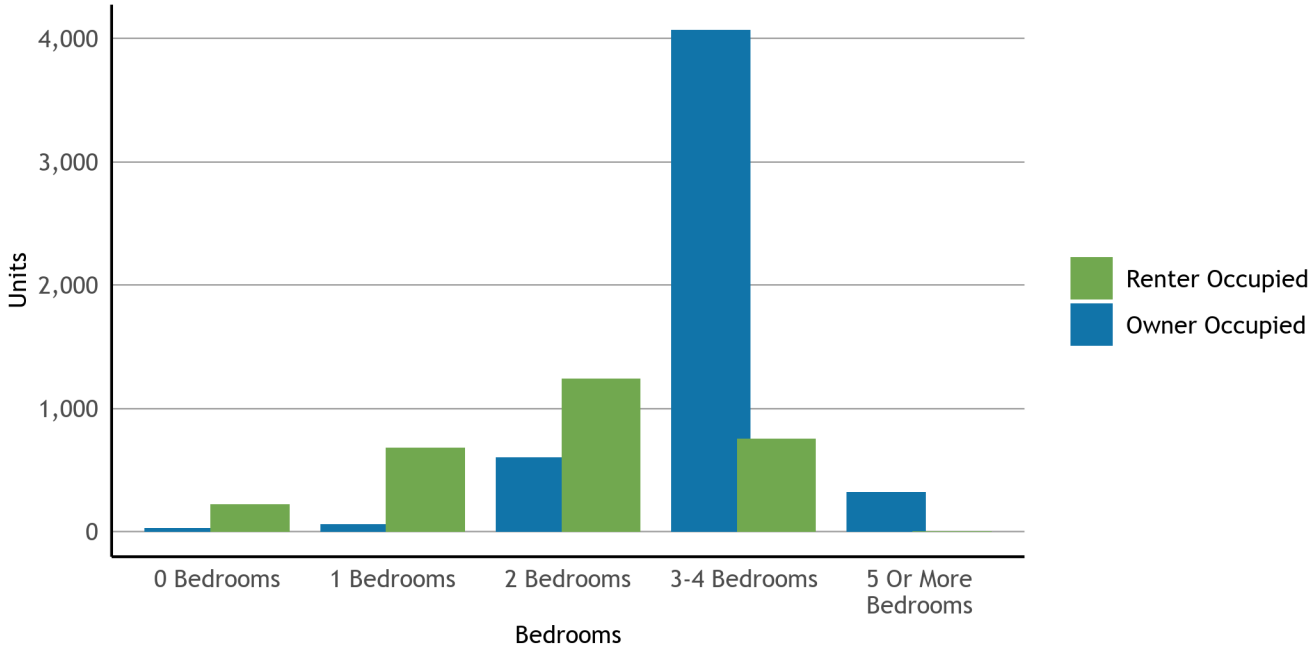
Table 2-6. Household Size by Household Income Level

Variable	0%-30% of AMI	31%-50% of AMI	51%-80% of AMI	81%-100% of AMI	Greater than 100% of AMI
All other household types	883	948	1,165	842	3,824
Large Families of 5+ Persons	40	22	55	75	295
Totals	**923**	**970**	**1,220**	**917**	**4,119**

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

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 5,142 units in Millbrae. Among these large units with three or more bedrooms, 14.7% are owner-occupied and 85.3% are renter-occupied (see Figure 2-52, Housing Units by Number of Bedrooms).

Figure 2-52. Housing Units by Number of Bedrooms

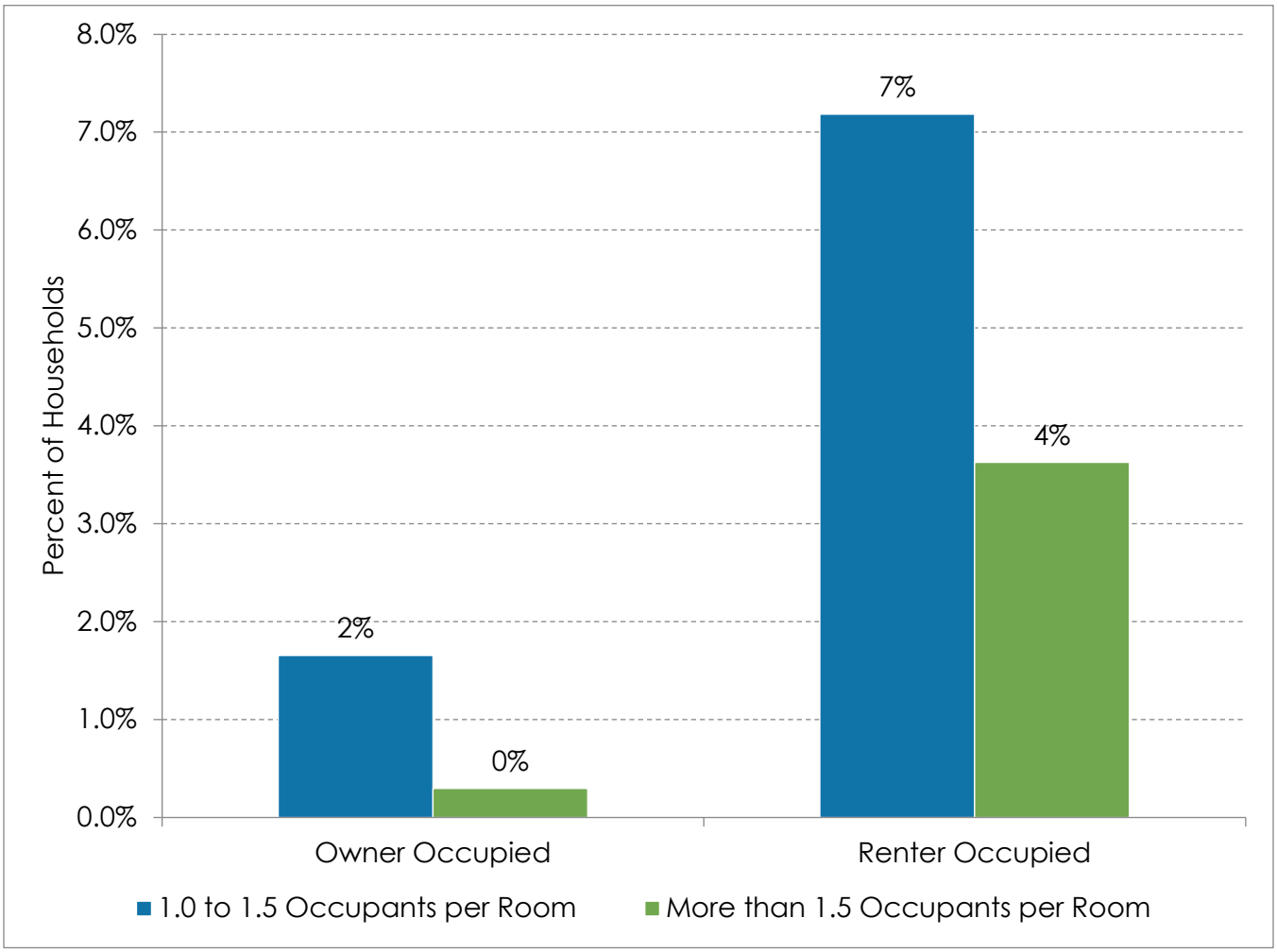


Source: *U.S. Census Bureau, ACS 5-Year Data (2015-2019), Table B25042*

The ACS defines "overcrowding" as a unit with more than one person per room and "severe overcrowding" as a unit with more than 1.5 people per room.

As shown in Figure 2-53, Crowding by Tenure and Severity, the incidence of overcrowding in Millbrae is fairly low, suggesting that the City has an adequate supply of larger homes to accommodate its households.

Figure 2-53. Crowding by Tenure and Severity



Source: *HUD, CHAS ACS tabulation, 2013–2017 release.*

2.9.2.2 Resources and Services for Large Households

Millbrae currently has a number of existing programs and services available to large households. These services are outlined in Table 2-11, Special Housing Needs Resources, in Section 2.9.8, Special Needs Resources.

Furthermore, the San Mateo County Consolidated Action Plan includes the following goals to address any gaps in large household housing and services:

- Support the development of larger publicly supported affordable housing units (2- and 3-3-bedroom units, or larger).
- Support the acquisition, creation, rehabilitation, and preservation of affordable housing units, including the adaptive reuse of non-housing structures for use as affordable housing.

2.9.3 People with Disabilities

The Americans with Disabilities Act defines a person with a disability as a person having a physical or mental impairment that substantially limits one or more major life activities. People with disabilities have special needs and many earn little income, have high healthcare costs, are dependent on supportive services, and/or require special accessibility accommodations, such as access ramps or elevators.

People with disabilities face unique problems obtaining adequate housing. This specific segment of the population, which includes individuals with mental, physical, and developmental disabilities, requires affordable housing conveniently located near needed services that is also specially adapted for their specific needs. Living arrangements for people with disabilities depend on the severity of the disability and can include arrangements such as living at home in an independent environment with the help of other family members, special housing design features for those with physical disabilities, income support for those unable to work, and in-home supportive services for people with medical conditions.

2.9.3.1 People with Physical and Mental Disabilities

Physical and mental disabilities can hinder access to housing units of conventional design and limit the ability of individuals with disabilities to earn an adequate income. The proportion of individuals with physical disabilities is increasing nationwide due to overall increased longevity and lower fatality rates. Individuals with mental disabilities include those disabled by a mental illness or injury, including schizophrenia, Alzheimer's disease, and conditions related to brain trauma. Disabilities tabulated by the census include sensory, physical, and mental limitations.

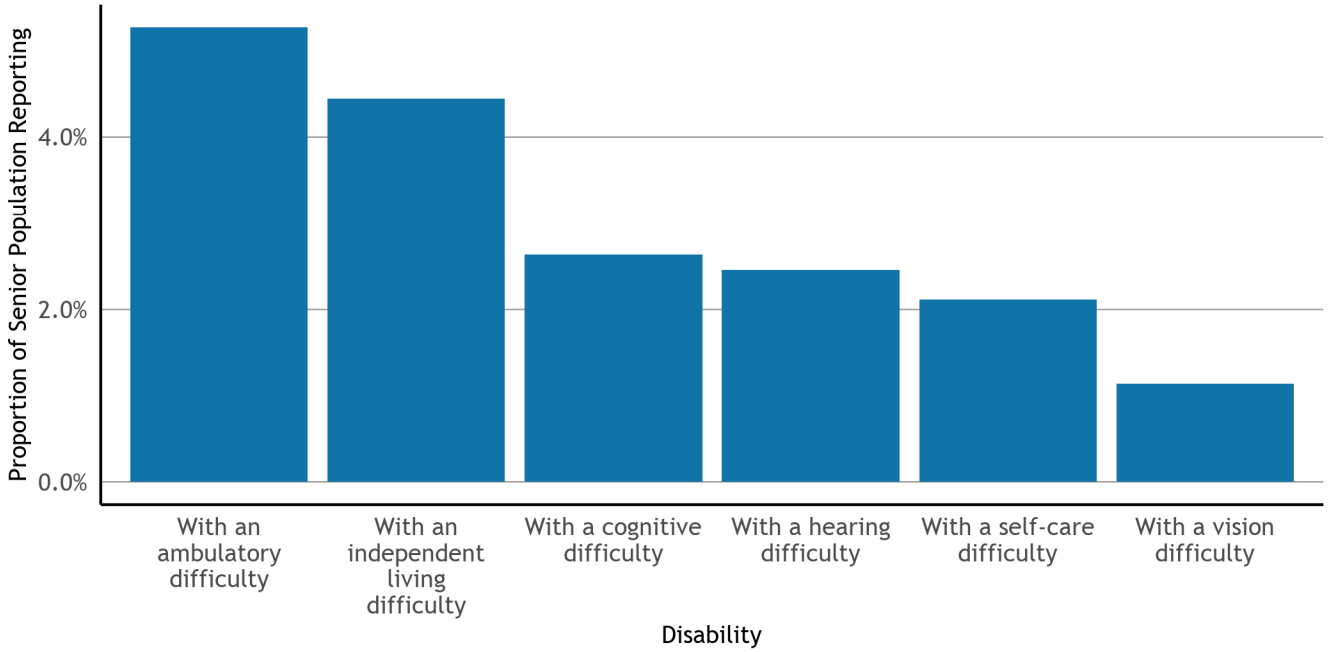
Needs Assessment for People with Physical and Mental Disabilities

According to the 2015–2019 ACS 5-Year Data, 2,048 Millbrae residents (approximately 9% of the City's population) were identified as having a disability. Disabilities included each of the categories tabulated by the census, with the majority of residents having a physical disability.

Figure 2-54, Disability by Type, presents the percentage of adult residents in the City with different types of disabilities, as reported by the 2015–2019 ACS 5-Year Data.[22]

[22] 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.

Figure 2-54. Disability by Type

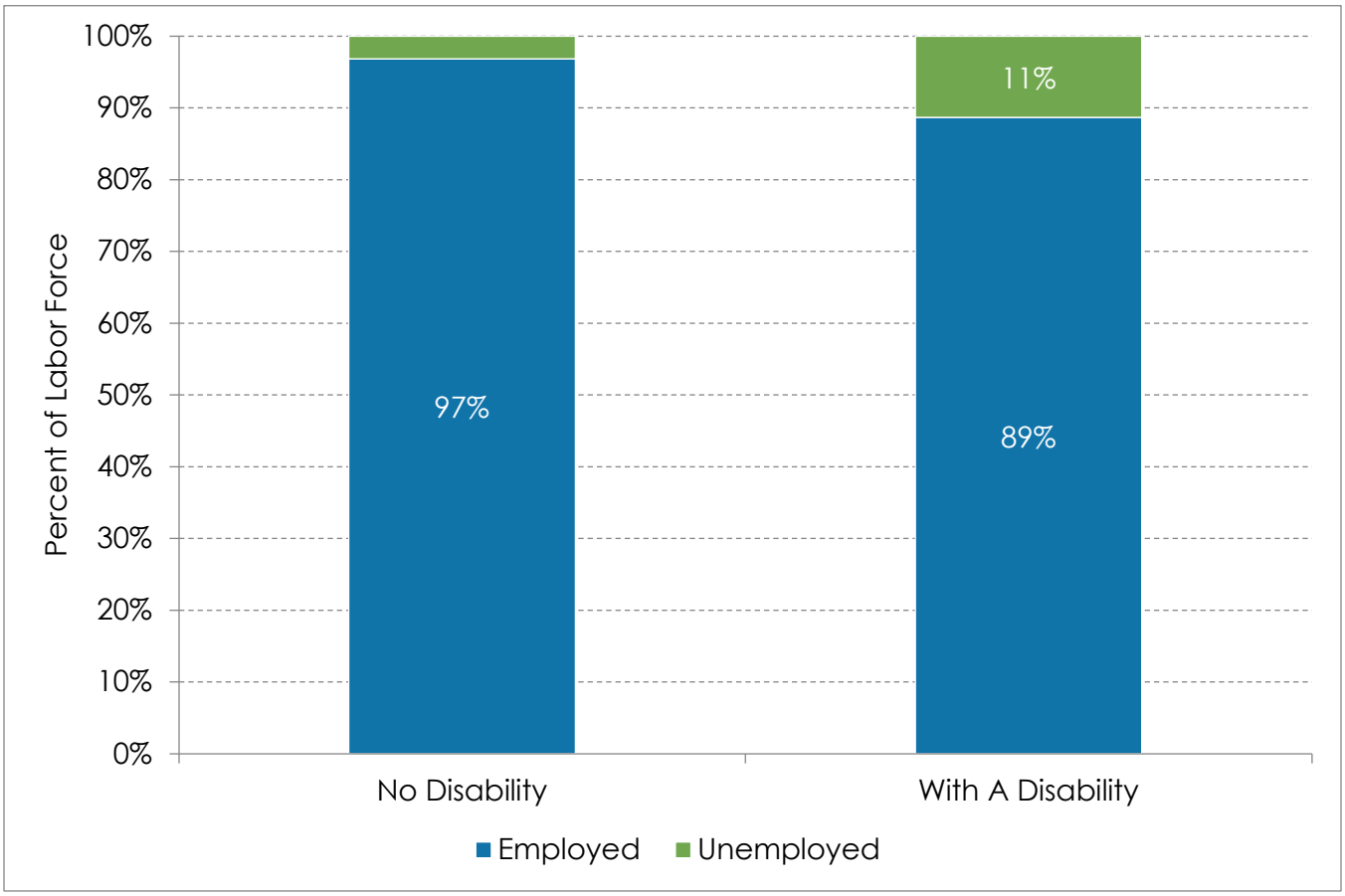


Source: *U.S. Census Bureau, ACS 5-Year Data (2015-2019), Table B18102, Table B18103, Table B18104, Table B18105, Table B18106, Table B18107.*

Per the 2015–2019 ACS 5-Year Data, 919 (or 21%) of the City's 4,319 seniors live with an ambulatory disability, the most common disability for seniors as well as for all adults. As the general population ages, the City will remain vigilant to address the needs of senior residents who are part of the City's population with disabilities (See Figure 2-50).

Understanding the employment status of individuals with disabilities may also be an important component in evaluating specialized housing needs. In Millbrae, 89% of the population with a disability are employed compared to 97% of the population with no disability. Conversely, the City's unemployment rate for individuals with a disability is higher than it is for those with no disability (11% and 3%, respectively) (Figure 2-55, Disability by Employment Status). Overall, because individuals with a disability are less often employed, they may require more assistance with finding affordable housing options.

Figure 2-55. Disability by Employment Status



Source: *U.S. Census Bureau, ACS 5-Year Data (2015–2019), Table C18120.*

2.9.3.2 People with Developmental Disabilities

Pursuant to California Welfare and Institutions Code, Section 4512(a), developmental disabilities are those disabilities that begin before adulthood and include intellectual disability, cerebral palsy, epilepsy, autism, and those disabling conditions that are closely related to intellectual disabilities or require treatment similar to that of those with intellectual disabilities. This definition does not include handicapping conditions that are solely physical in nature.

Using this definition as a benchmark for the purpose of this analysis, data provided by the ACS for the City's population with cognitive difficulties was used to quantify the total number of people with developmental disabilities. The definition of a "cognitive difficulty" provided by the ACS includes those resulting "because of a physical, mental, or emotional problem, having difficulty remembering, concentrating, or making decisions." Therefore, the ACS data used the definitions provided by the California Welfare and Institutions Code.

Some people with developmental disabilities are unable to work, rely on Supplemental Security Income, and live with family members. In addition to their specific housing needs, they are at

increased risk of housing insecurity after an aging parent or family member is no longer able to care for them.[23]

Needs Assessment for People with Physical and Mental Disabilities

The California Department of Developmental Services provides data on developmental disabilities by age and type of residence (Table 2-7, Population with Developmental Disabilities by Age, and Table 2-8, Population with Developmental Disabilities by Residence). This information includes a breakdown of the housing types in which individuals with developmental disabilities reside and a breakdown by age (minors versus adults). This data is collected at the ZIP-code level and may not perfectly match the ACS data used in this chapter. However, the data provide more context for the housing conditions of individuals with disabilities.

As shown in Table 2-7, of the population with a developmental disability, children under the age of 18 make up 50.6%, while adults account for 49.4%.

Table 2-7. Population with Developmental Disabilities by Age

Age Group	Number
Age Under 18	43
Age 18+	42

Source: *California Department of Developmental Services, Consumer Count by California ZIP Code and Age Group (2020)*

As shown in Table 2-8, individuals with developmental disabilities typically reside with a parent, family member, or guardian. However, many individuals reside in independent/supported living or in a community care facility.

[23] 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.

Table 2-8. Population with Developmental Disabilities by Residence

Residence Type	Value
Home of Parent /Family /Guardian	79
Other	5
Community Care Facility	5
Independent /Supported Living	5
Foster /Family Home	0
Intermediate Care Facility	0

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

Developmental disabilities can result in individuals with self-care and/or independent living difficulties, thereby preventing the usability of housing units of typical design and function without personal care. Due to these individuals' ability to remember, concentrate, and make decisions, their housing opportunities are further hindered because of economic constraints. These factors together drive the need for facilities designed to accommodate individuals with developmental disabilities.

Resources and Services for All Disability Types

Fair Housing Accessibility Standards and California Administrative Code, Title 24, set forth access and adaptability requirements for those with physical disabilities. These regulations apply to public buildings such as motels, employee housing, factory-built housing, and privately funded newly constructed apartment houses containing five or more dwelling units. The regulations also require that rampways, wider doorways, and restroom modifications be designed to enable free access.

Millbrae currently has a number of existing programs and services available to persons with disabilities. These services are outlined in Table 2-11 in Section 2.9.8.

Furthermore, the San Mateo County Consolidated Action Plan includes the following goals to address any gaps in housing and services for people with disabilities:

- Continue to convene meetings between SamTrans and disability advocates to discuss how to address barriers to transit access. Explore partnerships with private providers of transportation services to better address the transportation needs of persons with disabilities.

- Support the acquisition, creation, rehabilitation, and preservation of affordable housing units, including the adaptive reuse of non-housing structures for use as affordable housing.

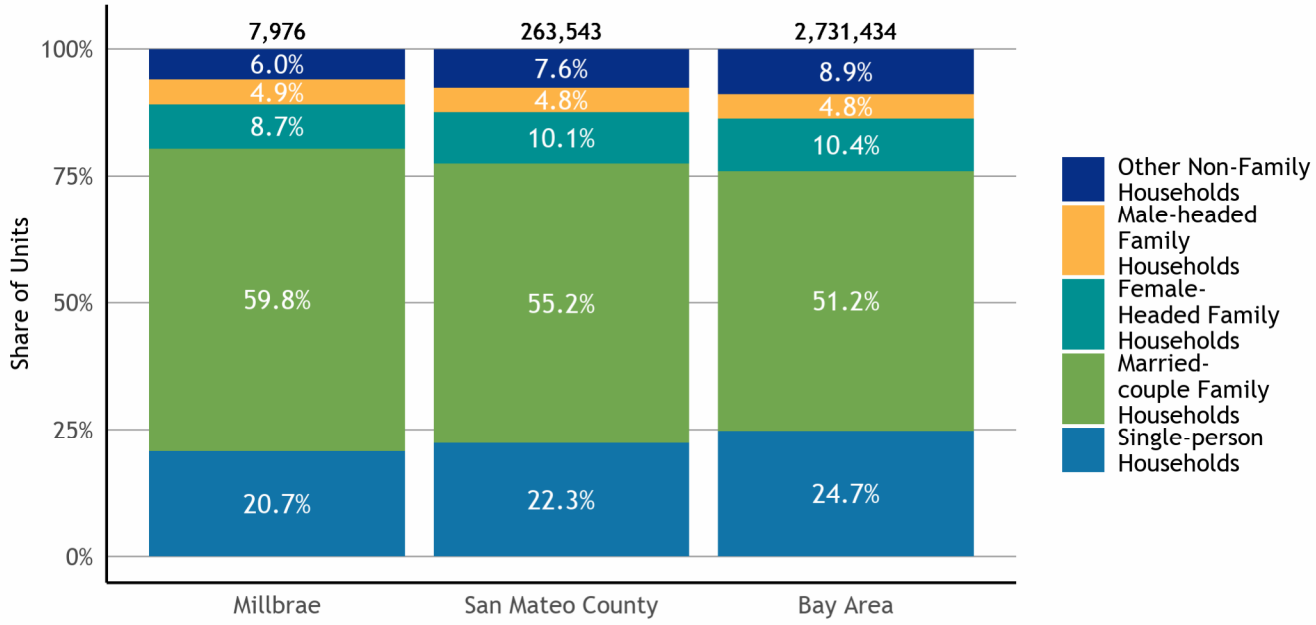
2.9.4 Female-Headed Households

Single-parent households require special consideration and assistance because of their greater need for daycare, healthcare, and other facilities. According to the HCD's website, "female-headed households can have lower incomes and higher living expenses and may lack the resources needed for adequate childcare or job training services, often making the search for affordable, decent, and safe housing more difficult."

2.9.4.1 Needs Assessment for Female-Headed Households

Households headed by one person are often at greater risk of housing insecurity, particularly female-headed households, which may be supporting children or a family with only one income. As shown in Figure 2-56, Household Type, the largest proportion of households is *Married-couple Family Households* at 59.8% of the total, while *Female-Headed Households* make up 8.7% of all households.

Figure 2-56. Household Type

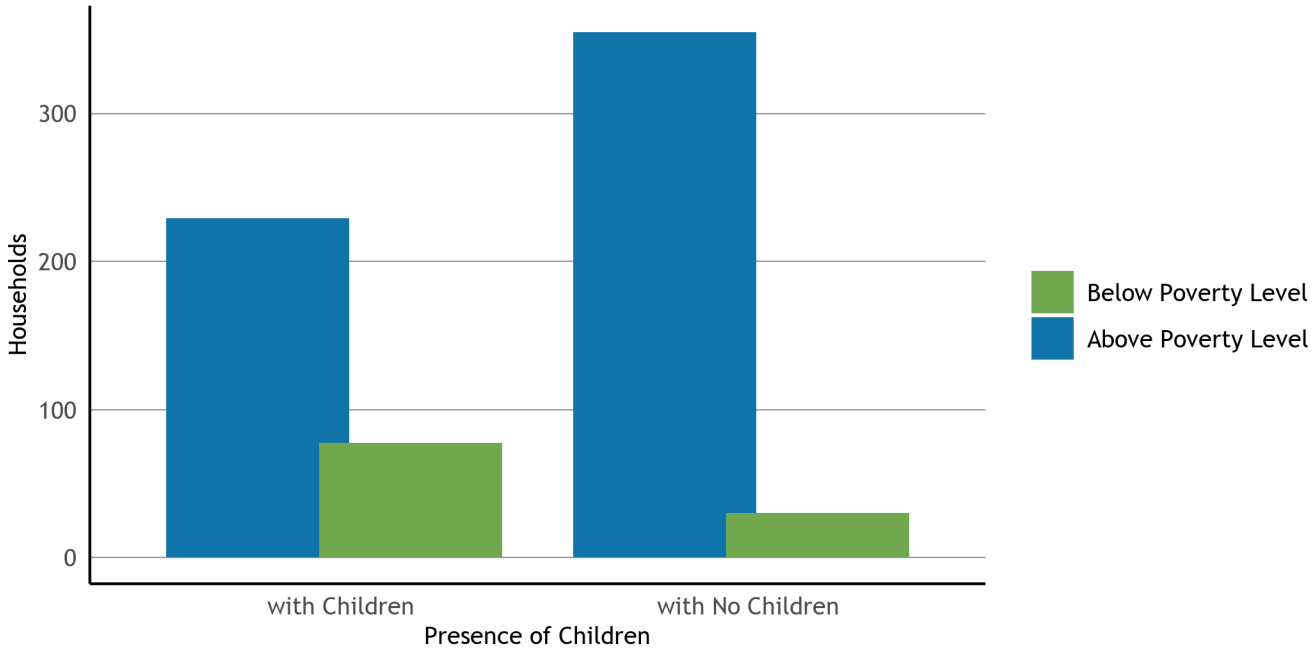


Source: *U.S. Census Bureau, ACS 5-Year Data (2015-2019), Table B11001*

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 Millbrae, 25.2% of female-headed households with children fall below the Federal Poverty Line, while 7.8% of female-headed households *without* children live in poverty (see Figure 2-57, Female-Headed Households by Poverty Status).

Figure 2-57. Female-Headed Households by Poverty Status



Source: *U.S. Census Bureau, ACS 5-Year Data (2015-2019), Table B17012*

High-quality, affordable childcare is a challenging issue that affects all families especially those headed by women. This can be a significant constraint that can prevent parents from being fully employed, resulting in lower income for the household and an inability to pay market rents or mortgages.

Although female-headed households in Millbrae represent a smaller special needs group than seniors and people with disabilities, the Housing Element provides for the needs of this group through policies that promote the maintenance and construction of affordable housing, specifically in areas close to commercial districts and transportation corridors.

2.9.4.2 Resources and Services for Female-Headed Households

Millbrae currently has a number of existing programs and services available to female-headed households. These services are outlined in Table 2-11, Special Housing Needs Resources, in Section 2.9.8, Special Needs Resources.

Furthermore, the San Mateo County Consolidated Action Plan includes the following goals to address any gaps in housing and services for female-headed households:

- Support the acquisition, creation, rehabilitation, and preservation of affordable housing units, including the adaptive reuse of non-housing structures for use as affordable housing.

2.9.5 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 January 2022, ABAG prepared a Farmworker Toolkit as a resource for Bay Area cities to identify farmworker needs. According to the Farmworker Toolkit, the Bay Area has shifted away from its historically agricultural economic base. However, Bay Area counties have continued to preserve their agricultural roots because many farmworkers live within Bay Area cities while commuting long distances for work. These farmworkers are considered permanent residents in their home communities. The Farmworker Toolkit presents data at the State level, and the ABAG Housing Needs Data presents data at the county level. Farmworker data available for this section is not presented at a city level.

2.9.5.1 Needs Assessment for Farmworkers

As shown in Table 2-9, Migrant Worker Student Population, there were no reported students of migrant workers in the 2019-20 school year in Millbrae. 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.

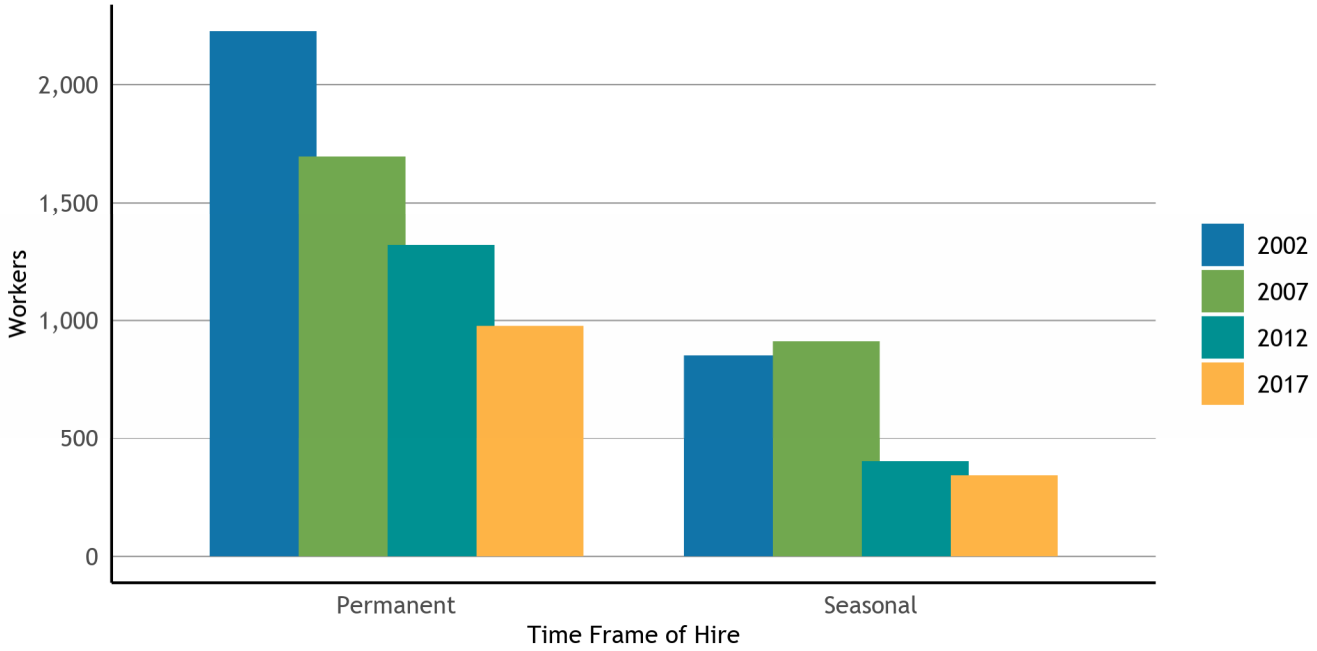
Table 2-9. Migrant Worker Student Population

Academic Year	Millbrae	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

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 (see Figure 2-58, Farm Operations and Farm Labor by county, San Mateo County).

Figure 2-58. Farm Operations and Farm Labor by County, San Mateo County

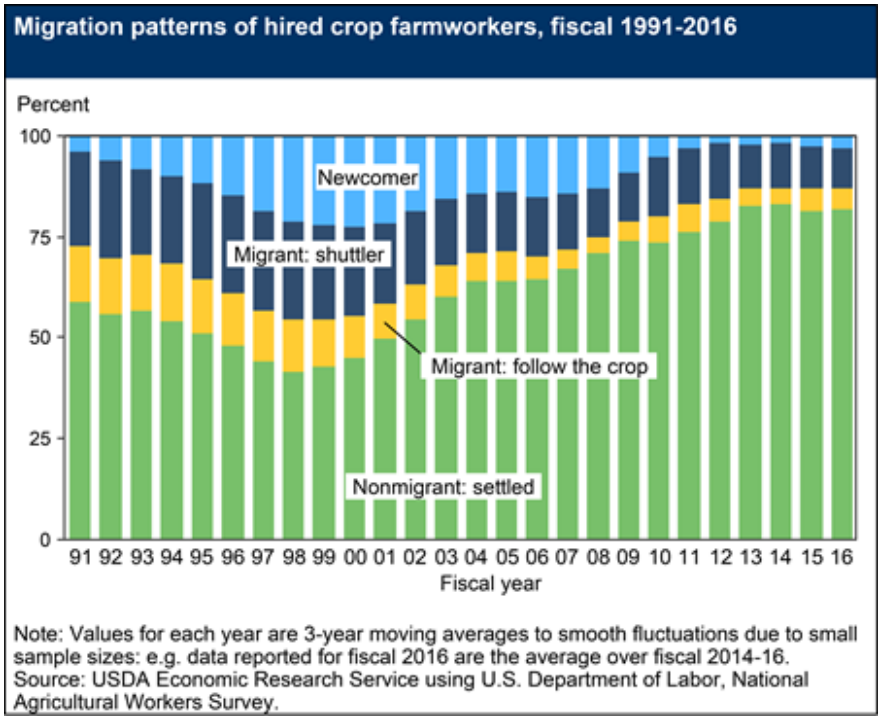


Source: *U.S. Department of Agriculture, Census of Farmworkers (2002, 2007, 2012, 2017), Table 7: Hired Farm Labor*

According to the Farmworker Toolkit provided by ABAG, over the past 2 decades, there has been a shift to a more permanent workforce for many farms, shifting the bulk of the affordable housing need from seasonal to permanent. As shown in Figure 2-59, Farmworker Migration Patterns, more than 80% of hired crop farmworkers are not migrant workers, but rather, settled.

This means that they work at a single location within 75 miles of their home. Among the smaller share of migrant workers are those who migrate from state to state, working on different crops as seasons advance, those who are shuttled across international borders, and newcomers who have not established a migration pattern.

Figure 2-59. Farmworker Migration Patterns



Source: *U.S. Department of Agriculture Economic Research Services, Farm Labor Webpage.*

Among other issues, farmworkers typically face low wages, leading to high rates of housing cost burden for farm working families. According to the BLS, California's mean farmworker wages range from $30,370 to $42,480 per year (see Figure 2-60, California Farmworker Wages). As discussed in Section 2.6.6, the 2022 median contract rent in the City is $3,479. This means that a worker would have to make $11,597 per month ($139,164 per year) to avoid being housing cost-burdened (spending more than 30% of their household income on housing costs).

Figure 2-60. California Farmworker Wages

Occupational Employment and Wages, May 2020	Employment	Employment (per thousand jobs)	Location quotient (1)	Hourly mean wage	Annual mean wage
Farmworkers and Laborers, Crop, Nursery, Greenhouse (45-2092)	200,130	12.18	5.76	$ 14.60	$ 30,370
Farmworkers, Farm, Ranch and Aquacultural Animals (45-2093)	2,290	0.14	0.53	$ 16.54	$ 34,400
Agricultural Workers, All Others (45-2099)	1,390	0.08	1.82	$ 20.42	$ 42,480
Agricultural Equipment Operators (45-2091)	7,060	0.43	2.04	$ 16.55	$ 34,420

Source: *BLS, California Farmworker Wages (May 2020).*

Finally, the Farmworker Toolkit states that based on recent studies in the greater Bay Area (San Mateo and Monterey County), the following issues affect farmworkers:

- High unmet needs for agricultural workforce housing;
- Housing that is often in poor repair and overcrowded;
- Financial needs to support small agricultural producers/employers and employees who cannot afford market-rate housing;
- Difficulty attracting and retaining employees as a result of low housing availability;
- Sharp decline in foreign agricultural workers and a shift to more permanent workers (2002 permanent workers equaled 38%; 2017 permanent workers equaled 49%); and
- Need for farmworker housing that accommodates families in urban communities.

Ultimately, a very small percentage (if any) of residents are employed farm workers, and there are no parcels within the City that are zoned for agricultural use. Given the minimal presence of farm workers in the community, the City has not identified a need for specialized farm worker housing. Still, there are a number of existing programs and policies applicable to the needs of farmworkers that the City provides.

2.9.5.2 Resources and Services for Farmworkers

Millbrae currently has a number of existing programs and services available to farmworkers. These services are outlined in Table 2-11 in Section 2.9.8.

Furthermore, the San Mateo County Consolidated Action Plan includes the following goals to address any gaps in housing and services for farmworkers:

- Support the acquisition, creation, rehabilitation, and preservation of affordable housing units, including the adaptive reuse of non-housing structures for use as affordable housing.

2.9.6 Homelessness

Homelessness remains an urgent challenge in many communities across the state, reflecting a range of social, economic, and psychological factors. Previous factors contributing to the rise in people experiencing homelessness included the general lack of housing affordable to lower-income people, increases in the number of people whose incomes fall below the poverty level, reductions in public subsidies, the de-institutionalization of those with mental illness, and increasing substance abuse issues. The increase in the number of layoffs and the loss of employment during the COVID-19 pandemic have likely contributed to an increase in this population because these effects resulted in the inability to afford housing. Any impacts of the COVID-19 pandemic on homelessness in San Mateo County likely continued beyond the lifting of eviction moratoriums and resulted in a further increase in people experiencing homelessness.

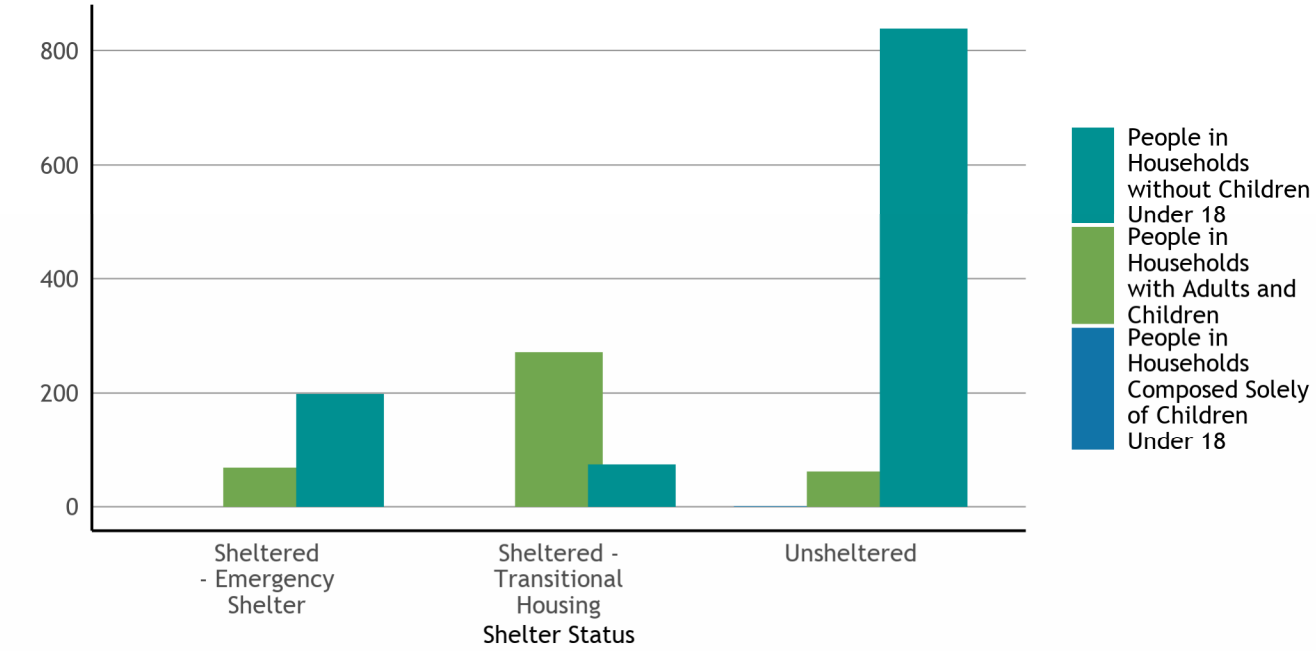
Far too many residents who have found themselves housing insecure have ended up unhoused or homeless in recent years, either temporarily or long-term. Addressing the specific housing needs of the unhoused population remains a priority throughout the region, particularly since homelessness is disproportionately experienced by people of color, people with disabilities, those struggling with addiction, and those dealing with traumatic life circumstances.

2.9.6.1 Needs Assessment for Persons Experiencing Homelessness

According to the San Mateo County 2022 Point in Time count, there are 1,808 people experiencing homelessness in the County. While the data gathered by the County does not provide a complete breakdown of the types of households experiencing homelessness in Millbrae, it does specify that, in 2022, there were 9 unsheltered persons experiencing homelessness. It is important to note that the data provided in Figures 2-60 through 2-63 and Table 2-10, Students in Local Public Schools Experiencing Homelessness, portray 2019 data provided by ABAG. As a result, the data provided previously may not correspond with the figures and table.

The most common type of household experiencing homelessness in the County is those without children in their care. Among households experiencing homelessness that do not have children, 75.5% are unsheltered. Of homeless households with children, most are sheltered in transitional housing (see Figure 2-61, Homelessness by Household Type and Shelter Status, San Mateo County).

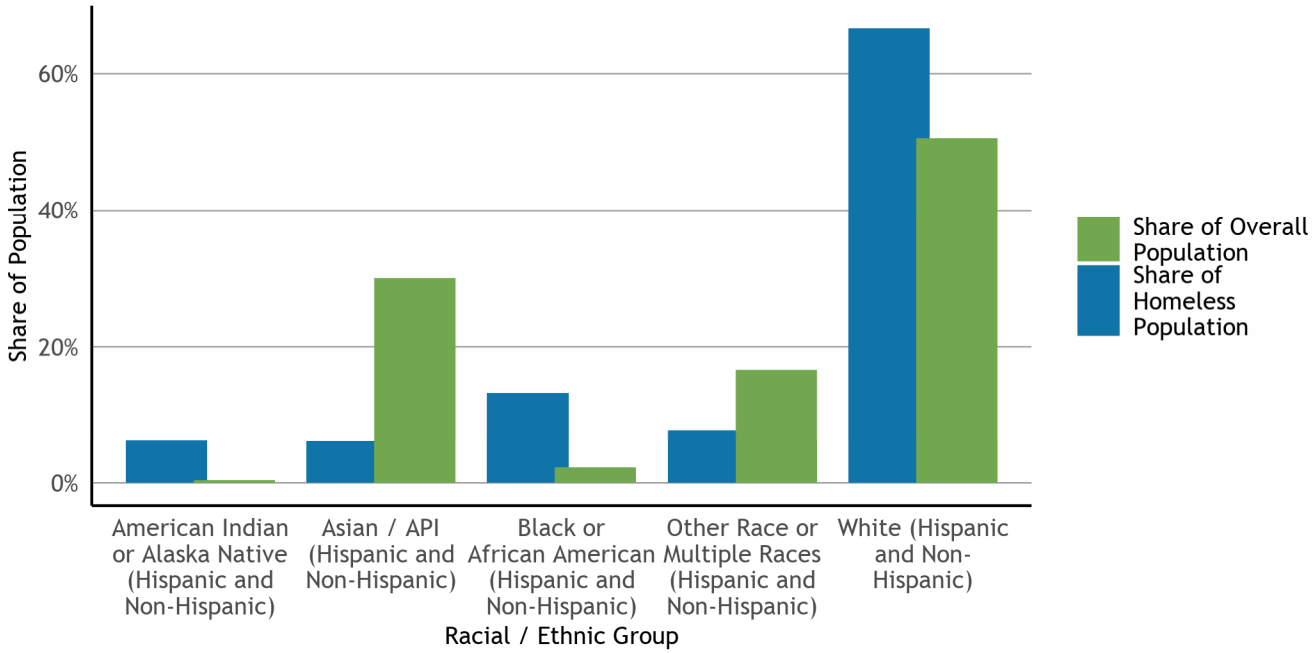
Figure 2-61. Homelessness by Household Type and Shelter Status, San Mateo County



Source: *HUD, Continuum of Care (CoC) Homeless Populations and Subpopulations Reports (2019)*

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. Consequently, people of color are often disproportionately impacted by homelessness, particularly Black residents of the Bay Area. In San Mateo County, White (Hispanic and Non-Hispanic) residents represent the largest proportion of residents experiencing homelessness and account for 66.6% of the homeless population, while making up 50.6% of the overall population (see Figure 2-62, Racial Group Share of General and Homeless Populations, San Mateo County).

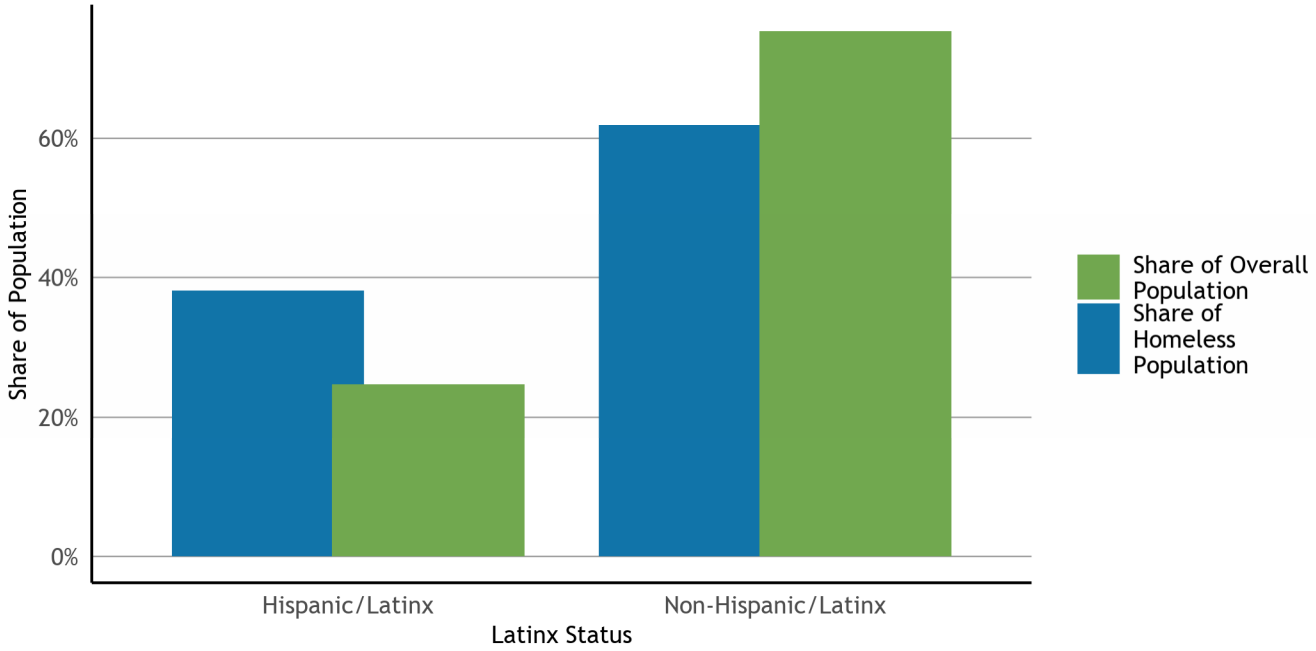
Figure 2-62. Racial Group Share of General and Homeless Populations, San Mateo County



Source: *HUD, CoC Homeless Populations and Subpopulations Reports (2019); U.S. Census Bureau, ACS 5-Year Data (2015-2019), Table B01001(A-I)*

In San Mateo County, Latinx residents represent 38.1% of the population experiencing homelessness, while Latinx residents comprise 24.7% of the general population (see Figure 2-63, Latinx Share of General and Homeless Populations, San Mateo County).

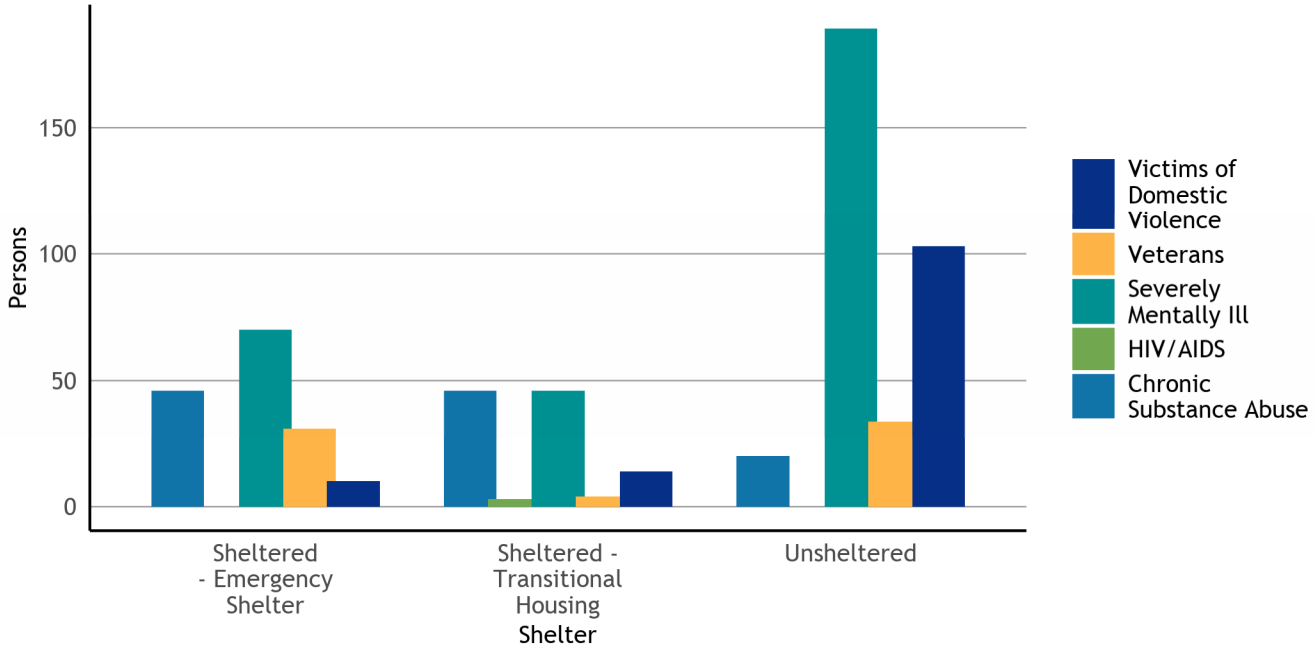
Figure 2-63. Latinx Share of General and Homeless Populations, San Mateo County



Source: *HUD, CoC Homeless Populations and Subpopulations Reports (2019); U.S. Census Bureau, ACS 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 (see Figure 2-64, Characteristics for the Population Experiencing Homelessness, San Mateo County). Of those, some 62% are unsheltered, further adding to the challenge of handling the issue.

Figure 2-64. Characteristics for the Population Experiencing Homelessness, San Mateo County



Source: *HUD, CoC Homeless Populations and Subpopulations Reports (2019)*

In Millbrae, the student population experiencing homelessness totaled 16 during the 2019-20 school year and decreased by 51.5% since the 2016-17 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. The number of students in Millbrae experiencing homelessness in 2019 represents 1.3% of the San Mateo County total and 0.1% of the Bay Area total (See Table 2-10, Students in Local Public Schools Experiencing Homelessness).

Table 2-10. Students in Local Public Schools Experiencing Homelessness

Academic Year	Millbrae	San Mateo County	Bay Area
2016-17	33	1,910	14,990
2017-18	15	1,337	15,142
2018-19	19	1,934	15,427
2019-20	16	1,194	13,718

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)*

2.9.6.2 Resources and Service for Persons Experiencing Homelessness

Millbrae currently has a number of existing programs and services available to people experiencing homelessness. These services are outlined in Table 2-11 in Section 2.9.8.

Furthermore, the San Mateo County Consolidated Action Plan includes the following goals to address any gaps in housing and services for people experiencing homelessness:

- Continue to support the development of publicly supported housing for County Clients - residents with special needs (experiencing homelessness, frail elderly, mental health issues, substance abuse issues).
- Support the acquisition, creation, rehabilitation, and preservation of affordable housing units, including the adaptive reuse of non-housing structures for use as affordable housing.
- Support public services, including shelter operations, rapid re-housing, and shelter diversion, which address the goals of the County's plan to prevent and end homelessness.
- Support public facilities, including emergency shelters and supportive housing facilities, that address County goals to prevent and end homelessness.

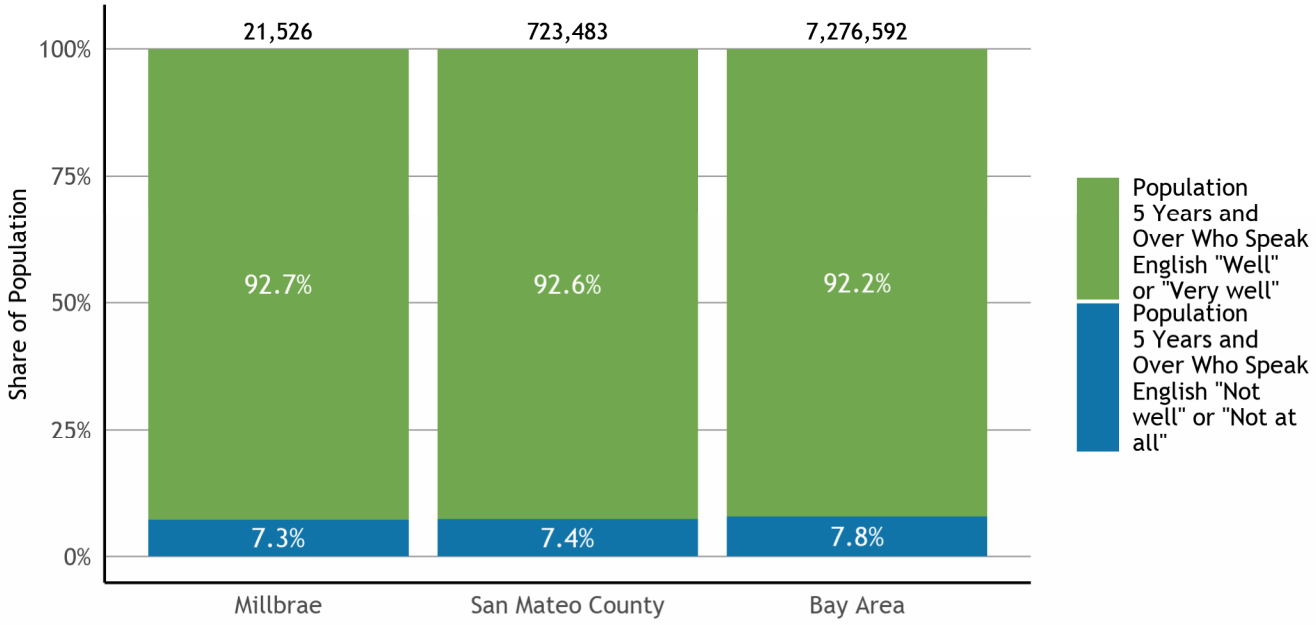
2.9.7 Non-English Speakers

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 common 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.

2.9.7.1 Needs Assessment for Non-English Speakers

In Millbrae, 7.3% of residents five 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 five years and older with limited English proficiency is 8% (See Figure 2-65, Population with Limited English Proficiency).

Figure 2-65. Population with Limited English Proficiency



Source: *U.S. Census Bureau, ACS 5-Year Data (2015-2019), Table B16005*

2.9.7.2 Resources and Service for Non-English Speakers

Millbrae currently has a number of existing programs and services available to non-English Speakers. These services are outlined in Table 2-11 in Section 2.9.8.

2.9.8 Special Housing Needs Resources

The City of Millbrae provides access to affordable housing services for special housing needs populations in the City. Table 2-11, Special Housing Needs Resources, details some of the services available for special housing needs populations.

Table 2-11. Special Housing Needs Resources

Name	Phone	Website	Utilization	Group
San Mateo County of Department of Housing	650.802.5050	smc.housingbayarea.org	Resource for finding affordable housing opportunities across San Mateo County.	All

Name	Phone	Website	Utilization	Group
Housing Authority of the County of San Mateo	650.802.3300	smchousingwaitlist.org	Moving To Work (MTW) program	All
HIP Housing	650.348.6660	hiphousing.org	A non-profit organization providing home sharing, self-sufficiency, and property development.	All
The Housing Endowment and Regional Trust (HEART)	650.204.5640	www.heartofsmc.org	Public/private partnership among the cities, businesses, and communities in San Mateo County that works to create more affordable housing through land acquisition, rehabilitation, and early funding to affordable housing projects for low-income residents.	All
Legal Aid Society of San Mateo County	650.558.0915	legalaidsmc.org	Provides tenant/landlord assistance.	All
Project Sentinel	650.321.6291	housing.org	Provides tenant/landlord assistance and fair housing education.	All
Community Legal Services of East Palo Alto	650.326.6440	clsepa.org	Free legal assistance for housing-related issues.	All
Peninsula Conflict Resolution Center	650.345.7272	prcweb.org	Mediation, coaching, and collaborative problem-solving for landlords and tenants.	All
Samaritan House	650.345.7272	samaritanhousesanmateo.org	Provides a range of services and helps families avoid a major crisis and homelessness with emergency rent or assistance with utility bills.	All
Libre Project	650.517.8936	thelibreproject.org/pbservices.html	Offers free public benefits enrollment assistance in health insurance, food Programs, and financial assistance.	All
San Mateo County Emergency Rental Assistance Program	833.430.2122	smcgov.org/san-mateo-county-emergency-rental-assistance-program	Offers COVID-19 rental assistance through the California State Rent Relief Program – Housing is Key.	All
Below Market Rate (BMR) Housing		smcgov.org/housing/below-market-rate-bmr-housing	Affordable housing homeownership assistance.	All

Name	Phone	Website	Utilization	Group
California Mortgage Relief Program	888-840-2594	Camortgagerelief.org	Provides one-time payments to qualified homeowners who have fallen behind on housing payments.	All
Emergency Housing Vouchers	650.347.3648	samaritanhousesanmateo.org	Housing assistance provided through a local core service agency.	Homeless
Monthly Birthday Luncheons for Seniors	650.259.2360		Social gatherings and food events for seniors. Requires a reservation.	Seniors
Self-Help for the Elderly	415.319.4115 650.342.0822	selfhelpelderly.org/locations	Provides nutritious meals to the elderly with an option for home-delivered meals. Requires a reservation.	Seniors
Grocery Assistance Program	650.342.2255	callprimrose.org	Provides free weekly groceries for pick-up or walk-in to individuals and families in need.	All
Second Harvest of Silicon Valley	800.984.3663	shfb.org/get-food	Grocery and meal programs are served in San Mateo County.	All
Virtual Social Groups and Activities		highway61.co	Provides real-time conversation groups for those over 50 including support groups, trivia, bingo, etc.	Seniors
San Mateo Adult & Career Education	650.558.2100	sanmateoadulted.org	Provides a range of programs to help adult learners of all ages and backgrounds grow their skills and community.	All
Resources for Veterans		aarp.org hsa.smcgov.org/veterans-resources	Resource guide for veterans	Veterans
Bread Sales		Community Center lobby 623 Magnolia Ave, Millbrae, CA 94030	Bread and pastries are available to be purchased in the Community Center lobby.	All

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3 HOUSING CONSTRAINTS

City, State of California (State or California), and federal governments can constrain development through regulatory requirements and internal processes that affect project permitting complexity, timelines, and costs. Additional nongovernmental constraints take the form of market factors (e.g., land costs, construction costs, ability to obtain financing, and development feasibility of housing projects), and environmental constraints.

The City (City or Millbrae) works to reasonably reduce governmental constraints to development and influence nongovernmental constraints, where and when possible, to support housing development. However, the pace of new housing supply has not kept up with demand: The increase in the number of homes between 2010 and 2020 was only 3.1%, which is below the growth rate of the region's housing stock during this period[1]. This chapter includes a summary of constraints and discusses past and planned initiatives to reduce them where possible.

3.1 Nongovernmental Constraints

Nongovernmental constraints are market and environmental forces that act as impediments to building housing. The City has less control over these factors but can take actions to help mitigate burdens to housing production.

3.1.1 Land Costs

Since the City is mostly developed, vacant land is significantly limited. Opportunities to redevelop underutilized commercial and retail properties with existing structures and improvements can be the most feasible option for higher-density residential development, particularly within the boundaries of the Millbrae Station Area Specific Plan (MSASP).

Land values in the City are relatively high, as is the case in most of the Bay Area. According to an April 2022 study by Century Urban (prepared as part of the San Mateo County collaborative, 21 Elements), the price of the average single-family lot is $1 million, while multifamily zoned land costs approximately $100,000 per entitled unit in the County (San Mateo County or County).

[1]ABAG/MTC Staff and Baird + Driskell Community Planning. (2021). *Housing Needs Data Report: Millbrae*.

According to 2012-2019 data published by the Federal Housing Finance Agency in October 2020, the Citywide price of the average single-family lot is approximately $1,773,000, while multifamily zoned land costs approximately $63,000 per entitled unit.

3.1.2 Construction Costs

Residential construction costs have increased significantly since the Great Recession which occurred generally between 2007-2010. According to a report by the University of California, Berkeley, Terner Center (Terner Center) in March 2020, construction costs in California increased by 25% between 2008 and 2018. The Terner Center notes that construction costs fell immediately following the Great Recession but rose 80% between 2014 and 2018. Furthermore, supply chain issues paired with an increase in residential construction activity have caused lumber and other material costs to rise significantly since the beginning of the COVID-19 pandemic in 2020. According to Century Urban, single-family residential construction costs range from $420 to $525 per square foot and multifamily residential construction costs range from $517 to $522 per square foot in the County.

3.1.3 California Government Code, Section 65583(a)(6), Development Analysis

California Government Code, Section 65583(a)(6), requires an analysis of requests to develop housing at densities below those anticipated in the Sites Inventory and the length of time between receiving approval for housing development and the submittal of an application for a building permit. The analysis must also look at local efforts to remove nongovernmental constraints that create a gap in the jurisdiction's ability to meet the Regional Housing Needs Assessment (RHNA) by income category.

There were no requests to develop housing on sites identified in the 5th Cycle Housing Element Update at densities below those anticipated in the 5th Cycle Sites Inventory.

The length of time between receiving approval for a housing development and approval of an application for building permits is typically four to six months under normal circumstances for a professional design team, but this timeframe can vary depending on project complexity and the time the developer takes to complete construction documents. Incomplete construction documents or construction documents that do not demonstrate compliance with State and local building codes can require additional review time and potentially require additional rounds of review, which can delay projects. Items like changes to construction costs or other development costs that affect the feasibility, financing, or negotiations with design professionals are outside the City's control and may delay projects.

This analysis is required to examine local efforts to remove nongovernmental constraints that create a gap in the jurisdiction's ability to meet the RHNA by income category. The primary nongovernmental constraint to the development of affordable housing (very low-, low- and moderate-income housing) is the overall cost of affordable housing development (high land and development costs) and the lack of public funding sources to subsidize the development of these units. Given current construction costs and rents/sales prices that are affordable to very low-, low-, and moderate-income households, even with by-right density bonuses pursuant to California's Density Bonus Law, constructing affordable housing (particularly for households with low- and very low-incomes) costs more to develop than the revenues derived from the project, requiring public funding sources to fill the gap for funding/financing. Developers requiring funding from investors and lending institutions are required to submit a pro forma analysis (i.e., an analysis showing the costs to develop and the revenues available to fund the development) demonstrating financial feasibility or costs that are less than or equal to revenues.

Therefore, public subsidies are required to develop affordable housing. The subsidy typically comes from multiple sources in the form of Low-Income Housing Tax Credits (LIHTC), State grants, Investment Partnerships Program (HOME), funds, the dedication of land for projects, and/or other public sources. The lack of funding options can result in affordable projects that are more concentrated in areas with lower development and land costs. It is important to note that the City can offer concessions, such as expedited permit processing; development impact fee deferrals; reduction in park dedication standards (as permitted by the Subdivision Ordinance); and financial subsidies, such as Community Development Block Grants (CDBG), HOME, and in-lieu fee funds, to offset the cost impacts of development and planning fees, but it cannot fill the gap in funding for affordable housing developments on its own.

3.1.4 Availability of Financing

The availability of capital to finance new residential development is a significant factor that can affect both the cost and supply of housing. Two types of capital are involved in the housing market: (1) capital used by developers for initial site preparation and construction and (2) capital for financing the purchase of units by homeowners and investors. Interest rates substantially affect home construction, purchase, and improvement costs. A fluctuation in rates of just 2.5% can make a dramatic difference in the annual income needed to qualify for a loan. In general, financing for new residential development is available at reasonable rates. However, economic fluctuations due to the COVID-19 pandemic and recent inflation patterns have caused caution among lenders and may have lasting effects through this Housing Element Planning Period. Additionally, interest rates have climbed in recent months, making home prices and the cost of lending for projects more expensive. Lenders are also scrutinizing applicants more than they did in the past, leading to a lower number of approved mortgages despite affordable interest rates.

It is important to note that the availability of financing for developers of market-rate housing units does not appear to be a constraint as evidenced by the large number of housing units developed in the City at the "above moderate" income levels (pursuant to the City's 2021 Annual Progress Report). However, the availability of financing for affordable housing to lower-income households represents a governmental constraint as the lack of sufficient public subsidies required by affordable housing developers prevents more affordable units from being constructed. This topic is covered in Section 5.3, Governmental Constraints, in this chapter.

3.1.4.1 Homeownership

Federal Reserve Economic Data show home mortgage interest rates rising steadily from January 2022 after experiencing historic lows in January 2021 due to the COVID-19 pandemic and peaking in June 2022. High demand combined with a low supply of housing has led to significant increases in home prices. According to Redfin.com, the median sale price for single-family residences in the City increased by 40% between May 2020 and 2022. These trends could create barriers to homeownership for residents with lower incomes because wage growth has not kept up with rising home prices. For instance, median home prices for ownership residences in the City increased 103% between December 2012 and 2020 (according to Zillow.com), while median household income (reported by the U.S. Census Bureau) only increased 46% during the same period. The California Department of Finance (DOF) survey data presented in Chapter 2, Community Profile and Needs, of this Housing Element also shows that production has not been able to keep up with the housing demand in Millbrae with just 4.2% of the City's housing stock being built since 2010.

3.1.4.2 Rental Housing

According to the 2020 ACS 5-Year Estimates, more renter households in the City are severely cost-burdened (i.e., the household spends 50% or more of its income on rent) than in the County and the Bay Area as a whole. More specifically, 27% of renter households in the City spend 50% or more of their gross income on housing costs compared to 24% in the County and 22% in the Bay Area. Demand for housing in San Mateo County increased as a result of inland migration from San Francisco. This increase in demand could lead to an increase in rent across San Mateo County. According to the Marcus & Millichap San Francisco Metro Area Multifamily Market Report for Q2 of Fiscal Year (FY) 2021–22 (Marcus & Millichap Market Report), numerous residents in the densely populated cities of the Bay Area sought larger accommodations in more sparsely populated cities like Millbrae following the work-from-home orders of the COVID-19 pandemic. Figure 2-25 in Chapter 2 shows 26.4% of rental units were rented for $3,000 or more monthly compared to 22.1% in the County and 13.0% in the Bay Area.

3.1.5 Availability of Mortgage Financing

Under the Home Mortgage Disclosure Act (HMDA), lending institutions are required to disclose information on the disposition of loan applications and the income, gender, and race of loan applicants. The data for Millbrae was compiled by aggregating census tracts to approximate the City boundaries. Conventional financing involves market-rate loans provided by private lending institutions such as banks, mortgage companies, savings and loans, and thrift institutions.

In 2021, four households applied for government-backed mortgage loans, 324 households applied for conventional home mortgage loans, 1,721 households applied to refinance, and 95 households applied for home improvement loans in Millbrae (see Table 3-1, Disposition of Home Purchase and Improvement Loan Applications (2021), below). Of the applications for conventional purchase loans, 77% were approved, 8% were denied, and 15% were withdrawn or closed for incompleteness. Applications in 2021 increased for government-backed mortgage loans from zero to four applications and conventional mortgage loans by 17% from 2018. The 2021 conventional mortgage loans maintained a 75% approval rate from 2018 (Table 3-2, Disposition of Home Purchase and Improvement Loan Applications (2018), below). Approximately 70% of refinance applications were approved in 2021, exceeding the 60% approval rate in 2018. The denial rate for home improvement loans (16%) in 2021 decreased as compared to 2018 (32%).

Table 3-1. Disposition of Home Purchase and Improvement Loan Applications (2021)

	LOAN TYPE							
	GOVT-BACKED PURCHASE		CONVENTIONAL PURCHASE		REFINANCE		HOME IMPROVEMENT	
	#	%	#	%	#	%	#	%
Approved[1]	3	75.0%	248	76.5%	1,219	70.8%	58	61.1%
Denied	0	0.0%	25	7.7%	138	8.0%	15	15.8%
Other[2]	1	25.0%	51	15.7%	364	21.2%	22	23.2%
Total Applicants	**4**	**100%**	**324**	**100%**	**1,721**	**100%**	**95**	**100%**

[1] *Includes applications approved by lenders but not accepted by the applicants.*
[2] *Includes files closed for incompleteness and withdrawn applications*
Source: *FFIEC MSA/MD 2021 Aggregate Report for Census Tracts in Millbrae*

Table 3-2. Disposition of Home Purchase and Improvement Loan Applications (2018)

	LOAN TYPE							
	GOVT-BACKED PURCHASE		CONVENTIONAL PURCHASE		REFINANCE		HOME IMPROVEMENT	
	#	%	#	%	#	%	#	%
Approved[1]	0	0.0%	210	75.8%	253	59.8%	66	54.5%
Denied	0	0.0%	31	11.2%	85	20.1%	39	32.2%
Other[2]	0	0.0%	36	13.0%	85	20.1%	16	13.2%
Total Applicants	**0**	**0%**	**277**	**100%**	**423**	**100%**	**121**	**100%**

[1] *Includes applications approved by lenders but not accepted by the applicants.*
[2] *Includes files closed for incompleteness and withdrawn applications*
Source: *FFIEC MSA/MD 2018 Aggregate Report for Census Tracts in Millbrae*

3.1.6 Requests to Develop Housing at Lower Densities

To account for potential requests to develop housing at densities below those anticipated in the Sites Inventory, the City performed an analysis of sites included in the City's 5th Cycle Housing Element Update. The City found that no projects were completed at densities below those identified in the 5th Cycle Housing Element Update during the Planning Period. Therefore, it does not appear that requests to develop housing at densities below those anticipated in the Sites Inventory present a constraint.

3.2 Environmental Constraints

Environmental factors can constrain residential development in a community by increasing costs and reducing the amount of land suitable for housing. Known environmental constraints in the City of Millbrae include geologic and seismic hazards, flooding and landslides, biological resources, and risk from wildfire.

3.2.1 Geologic and Seismic Hazards

Geological conditions of concern that present additional vulnerability to the community include fault zones, earthquakes, unstable soils, and liquefaction. The City is located in San Mateo County in the seismically active San Francisco Bay region. Four major faults identified by the Alquist-Priolo Earthquake Fault Zoning Act are in proximity to the City: the San Andreas Fault, San Gregoria Fault, Hayward Fault, and Calaveras Fault. The greatest seismic risk to the City is the active San Andreas Fault, located within a mile of the western boundary of the City limits. In addition to these faults, the Serra Fault is a relatively short fault that crosses the City from north to south. Though not considered an active Alquist-Priolo fault, due to its proximity to the San Andreas Fault, the City considers it a potentially active fault and requires geologic studies

for development proposed near the fault. In addition, the Association of Bay Area Governments (ABAG) Resiliency Program has identified the ground-shaking potential for the City as 'violent,' largely due to its proximity to the San Andreas Fault. Soils found in the eastern portion of the City have the strongest amplification of ground shaking and have been identified as having a very high susceptibility to liquefaction during an earthquake event. Geotechnical and geologic reviews would be required before housing development to assess the seismic and geologic hazards. Adherence to the standards and regulations in the California Building Code and City Municipal Code would be required for all new development in the City to mitigate these potential hazards.

3.2.2 Flooding and Landslides

According to the Federal Emergency Management Agency (FEMA) flood insurance rate maps, portions of the City are in inundation zones for the 100-year and 500-year floods. The City has been subject to increased flash floods and extreme weather, which has been exacerbated by sea level rise specifically in low-lying areas in the eastern portion of the City. The western portions of the City contain steeper slopes and are susceptible to landslides induced by heavy rainfall events. There are numerous areas where landslides have occurred in recent history including Crestview and Sleepy Hollow, Clearfield, and Morningside. In April 2020, the City prepared a Sea Level Rise Adaptation Assessment with the support of a grant from the San Mateo County Office of Sustainability. The purpose of the Assessment is to expand the understanding of sea level rise risks to the City, communicate these risks to the community, and plan for sea level rise by identifying potential mitigations, adaptation, and hazard mitigation strategies.

The City has also prepared a Local Hazard Mitigation Plan Annex (2010), which focuses on mitigating these hazards and provides a comprehensive assessment of the threats the City faces from natural and human-caused hazard events and a coordinated strategy to reduce these threats. In addition, San Mateo County has recently updated the Multijurisdictional Local Hazard Mitigation Plan (2021), which also defines measures to reduce risks from natural disasters. This was developed in partnership with local governments throughout the County.

3.2.3 Biological Resources

The City predominantly consists of developed areas (approximately 81%), however, there are small patches of habitat, including California mixed evergreen forests, redwood forest, chaparral, grassland, pacific coast scrub, western riparian woodland, and open water, which provide potential habitat for special status species. Several wetland and non-wetland waters or features are located in and around the City, including estuarine wetlands, marine habitats, riverine, freshwater emergent wetlands, and freshwater ponds. Areas of estuarine and marine wetlands

are located on the eastern border of the City at Bayside Park on the San Francisco Bay and provide potential habitat for special status species. Freshwater emergent wetlands occur in the eastern portion of the City in undeveloped areas along Highway 101. Wetlands and non-wetland habitats are typically subject to the U.S. Army Corps of Engineers' jurisdiction under Section 404 of the Clean Water Act.

The California Natural Diversity Database has identified three special-status reptile species, one special-status amphibian, five special-status bird species, 10 special-status mammal species, 16 special-status invertebrate species, two special-status fish species, 35 special-status plant species, and three critical habitat areas known to occur within five miles of the City. There is no known critical habitat within the City limits.

3.2.4 Risk from Wildfires

The City is identified by the California Department of Forestry and Fire Protection (CAL FIRE) as a local responsibility area, meaning fire protection is provided by the Central County Fire Department. The western edge of the City is subject to moderate to high fire hazard risk. The remainder of the City is not zoned, indicating there is no designated fire hazard severity. Fire on undeveloped land in the City is predominantly located adjacent to or west of Spur Trail and in large sloping private lots throughout the western portion of the City. Structure fires represent the majority of fire hazards in the City. Climate change is expected to increase the incidents of wildfire in the surrounding foothills and mountains in the San Francisco Bay Area, including the City. The potential for post-wildfire soil erosion is moderate to high on the eastern edge of the City. All new development would be required to comply with the City's Fire Code, which is in accordance with the California Fire Code.

3.3 Governmental Constraints

Housing affordability is influenced by factors in both the private and public sectors. The policies that guide residential development in the City and the processes for building or expanding housing influence the amount of housing developed and its type, form, location, and ultimate price. Land use controls, development standards, fees, and other local programs can have the unintended consequence of serving as a constraint to housing development. The following describes the various potential government constraints on housing development in Millbrae.

3.3.1 State and Federal Constraints

In addition to local governmental constraints (described later in this chapter), federal and State barriers and disincentives also exist that limit the production of housing. These constraints include national economic and job market conditions, State and federal laws and regulations,

and a significant lack of funding and subsidies needed to support housing that lower- and moderate-income families can afford.

3.3.2 National and State Economic and Job Market Conditions

Technology and globalization have changed the economy significantly in the last two decades. Federal laws and policies have allowed U.S. companies to move manufacturing and service jobs overseas and outsourced for much lower costs to maintain or increase profits, leading to a significant stagnation in wages for lower-skilled workers, while the cost of living (including housing costs) has continued to increase. The Congressional Research Service published a study titled "Wage Inequality and the Stagnation of Earnings of Low-Wage Workers: Contributing Factors and Policy Options" (February 5, 2020) that states the following:

> *Over the 1979–2018 period, real wages at the 10th percentile of the hourly wage distribution grew by 1.6%, whereas wages at the 50th percentile grew by 6.1% and wages at the 90th percentile grew by 37.6%.*

The Massachusetts Institute for Technology published a study called "The Work of the Future: Shaping Technology and Institutions" (2019), which states that, with automation, technology changes, and globalization, workers lacking some form of college degree suffer stagnating wages and significantly less economic security. This study states that employment is "polarizing" in both the United States and the industrialized world for the following reason:

> *At the top end, high-education, high-wage occupations offer strong career prospects and rising lifetime earnings. On the other end, low-education, low-wage occupations provide little economic security and limited career earnings growth. As a result, the pathways to economically stable and secure careers for workers without college degrees are becoming narrower and more precarious. Simply put: we see no shortage of good careers for highly educated workers. And we see no shortage of jobs for less educated workers. But we do find a paucity of good careers for workers without significant post-secondary training—strong technical or vocational training, associate's degree level certification in a credentialed field, or attainment of a traditional four-year college or graduate degree.*

As documented above, and in numerous articles and studies in recent years, as automation, technology changes, and globalization of jobs and manufacturing have occurred, lower-skilled and less-educated workers are not experiencing wage growth that is sufficient to keep up with rising housing costs. This has exacerbated the affordable housing need and crisis currently affecting California and many other states.

The University of California, Berkeley, Labor Center also reports the following information on low-wage earners on their website (https://laborcenter.berkeley.edu/low-wage-work-in-california/):

- One of every three California workers earns low wages.
- 32% of California workers earned less than $14.35 per hour in 2017.
- Nearly 5 million low-wage workers are in California.
- Changes in the employment market and wage growth are experienced on a local level. In Millbrae, median sales prices for single-family homes have increased up to 73% between 2017 and 2020 (according to Redfin.com), while median household income in San Mateo County (reported by the U.S. Census Bureau) only increased 10% during the same period. Limited wage growth is a significant barrier to individuals and families who are currently housed or seeking housing and has created a large need for affordable housing.

3.3.2.1 Lack of Federal and State Funding and Subsidies for Affordable Housing

Market factors and government regulations contribute to increased costs toward the development of affordable housing, making it even more costly than a market-rate housing development. These factors include the need to secure multiple funding sources (which delays project development), prevailing wage premiums, and sustainable development standards (which help to address sustainability but increase costs).

Although Millbrae does not have any income-restricted affordable housing covenants expiring during the 6th Cycle Planning Period, generally high costs of development can result from high land and labor costs, density restrictions, development fees, and the complexity of financing. As stated previously, affordable housing relies on a multitude of State and federal subsidies documented in Chapter 4, Housing Resources and Opportunities, of this Housing Element.

While the need for affordable housing is significant across California, neither the State nor the federal governments allocate sufficient funding subsidies for the number of affordable units required by RHNA. Furthermore, public subsidies are rarely sufficient to fully fund an individual affordable housing project. Therefore, developers must leverage and apply for several State and federal sources of funds, in addition to private lending; all of which can be extremely time-consuming processes. More specifically, a multifamily development can require five to 10 funding sources to finance its construction and developers generally layer financing from State and federal tax credits, Federal, and State housing programs, local land donations, and private loans from a financial institution.

Federal funding represents a large portion of California's resources to support affordable housing development. However, with pressures to cut spending at the federal level, funding for housing has declined in recent years, while the number of severely cost-burdened (i.e., those

spending 50% or more of their income on housing), and low-income renter households continue to increase. More specifically, CDBG and HOME funds allocated to California for the development of affordable housing declined by 51% and 66% between 2003 and 2015, respectively. These decreases in public subsidies, paired with increased demand for affordable housing, have made funding sources for affordable housing incredibly competitive.

3.3.2.2 Redevelopment Dissolution

As a result of legislation in 2011, all redevelopment agencies in the State were dissolved, which has had a profound effect on the quantity and complexity of affordable housing development in the State. Redevelopment was a tax increment financing tool that allowed cities and counties to retain a higher share of the growth in property taxes in designated "blighted" areas to invest in those areas to remediate blight. Referred to as "urban renewal" before 1979, over 400 cities and counties in the State used this tool. Redevelopment projects were required to allocate 20% of all tax increments for affordable housing in the community. On a Statewide level, over $2 billion generated on an annual basis for affordable housing was lost due to this State law change.

Despite State legislative efforts to replace Redevelopment with Enhanced Infrastructure Financing Districts and Community Revitalization Investment Areas (CRIAs), these financing tools generate a tiny fraction of the local funding that redevelopment did previously, which is the reason only a few Enhanced Infrastructure Financing Districts and no CRIAs have been adopted over the last 10 years. Given these facts, it is clear that the State has never initiated policies to replace this significant permanent source of affordable housing funding.

According to the tax increment projections contained in the Official Statement for the 2015 Tax Allocation Refunding Bond issued by the Successor Agency to the former Millbrae Redevelopment Agency, the Millbrae Redevelopment Project would have generated between $1.9 million and $2.5 million of affordable housing revenues ***per year*** over the 6th Cycle Planning Period. However, State law in 2011 dissolved redevelopment and this significant funding source has been lost. Despite State efforts to provide annual grants and other programs, these sources are not a guaranteed stream of income that is needed to build more affordable housing in the State.

3.3.2.3 State Regulations and Development Challenges

Other regulatory challenges that present barriers to development include the following:

- **Compliance with State regulations** and energy standards, GHG emissions reduction requirements, and other environmental conditions (needed to preserve the environment but add to development costs).

- **Prevailing wages** (a federal and State legal requirement for publicly funded projects) that can add 13–25% to hard construction costs (these additional costs are added to very high construction and materials costs and can push an affordable housing project to be financially infeasible).

3.3.3 Local Constraints

The Land Use Element sets forth City policies for local land development. These policies, together with existing zoning regulations, establish the amount and distribution of land allocated for different uses.

Local government regulations intend to protect public health and safety and to ensure a decent quality of life for the community. However, local policies and regulations may affect positively or negatively the price and availability of housing and in particular, the provision of affordable housing. Land use controls, site improvement requirements, fees and exactions, permit processing procedures, and other factors can constrain the maintenance, development, and improvement of housing.

State and federal regulations also affect the availability of land for housing and the cost of producing housing. Regulations related to environmental protection, building codes, and other topics are designed to protect public health and safety, but often, these regulations have adverse impacts on housing costs and availability. Perhaps one of the greatest constraints to the production of housing affordable to lower-income households is the chronic shortage of State and federal financial assistance for affordable housing. While constraints exist at other levels of government, the City has little or no control over these regulations and no ability to directly mitigate their effects on housing. Therefore, the City's efforts emphasize policies and regulations that can be mitigated by the City.

The current Land Use Element was adopted in 1998 as part of a comprehensive 1998-2015 General Plan Update. In 2015, the City began preparing its 2040 General Plan which includes a new Land Use and Built Environment Element.

Also in 1998, the City concurrently prepared and adopted the Millbrae Station Area Specific Plan (MSASP) in preparation for the BART/Caltrain Millbrae Station, which opened in 2003. The MSASP encompasses 16 acres around the Station and is intended to create a compact, walkable area that is highly transit-oriented. In 2016, the City revisited the MSASP and conducted a comprehensive update. It has been amended several times since.

Concurrently with the General Plan Update that is underway at the time of this writing, the City is preparing a new specific plan that will encompass all parcels in downtown and El Camino Real that are not within the boundaries of the MSASP. The Downtown and El Camino Real Specific

Plan (Specific Plan) is intended to "transform the City's primary areas of business and commerce into vibrant and connected mixed-use centers of cultural and economic activity."

3.3.3.1 Land Use Policies

Existing

The current Land Use Element of the Millbrae General Plan contains the primary policies that guide residential development in the City. These policies are implemented primarily through the Zoning Ordinance, which establishes the amount and distribution of different land uses in Millbrae, and the Subdivision Ordinance, which regulates the division and improvement of land. The Land Use Element establishes the following residential designations:

- **Very Low Density Residential** (up to 4 units/acre)
- **Low Density Residential** (4 to 8 units/acre)
- **Medium Density Residential** (8 to 17 units/acre)
- **Higher Density Residential** (17 to 80 units/acre)
- **Millbrae Station Area Specific Plan** (Mixed Use and Residential designations with densities up to 80 units/acre)

General Plan Update and Downtown and El Camino Real Specific Plan.

The Millbrae 2040 General Plan was adopted in December 2022. The residential land use designations in the General Plan allow the same densities that were previously allowed, except for the introduction of a new designation – Medium High Residential, which allows densities between 17 and 43 units per acre, as well as new designations within the Downtown and El Camino Real Specific Plan, which was developed concurrently with the General Plan Update. This specific plan provides new land use policies, density allowances, and development standards for all of the properties adjacent to El Camino Real that is not within the MSASP. The following residential designations are identified in the Downtown and El Camino Real Specific Plan:

- **Downtown Mixed Use** (25 to 50 units/acre on parcels fronting Broadway Ave; 70 to 110 units/acre on parcels fronting El Camino Real)
- **Corridor Mixed Use** (70 to 130 units/acre)
- **Residential Focused Mixed Use** (60 to 80 units/acre)
- **Neighborhood Commercial Mixed Use** (80 units/acre)

- **Residential** (no change to underlying zoning)

3.3.3.2 Density Bonus

Under State law (California Government Code, Sections 65915–65918), developers are entitled to a density bonus and/or equivalent concessions or incentives for the provision of affordable units to encourage the development of affordable and senior housing, including up to 50% increase in project densities for most projects, depending on the amount of affordable housing provided, and an 80% increase in density for projects that consist of 100% affordable units.

Cities and counties are required to grant a density bonus and other incentives and concessions to projects that contain one of the following:

- 5% or more of units are restricted to very low-income residents, as defined in Section 50105 of the Health and Safety Code.
- 10% or more of units are restricted to lower-income residents, as defined in Section 50079.5 of the Health and Safety Code.
- 10% of the total dwelling units in a common interest development, as defined in Section 4100 of the Civil Code, for persons and families of moderate-income, as defined in Section 50093 of the Health and Safety Code, provided that all units in the development are offered to the public for purchase.
- 100% of all units in the development, including total units and density bonus units, but exclusive of a manager's unit or units, are for lower-income households, as defined by Section 50079.5 of the Health and Safety Code, except that up to 20% of the units in the development, including total units and density bonus units, may be for moderate-income households, as defined in Section 50053 of the Health and Safety Code.
- 10% of the units or more are for transitional foster youth, as defined in Section 66025.9 of the Education Code, disabled veterans, as defined in Section 18541, or homeless persons, as defined in the federal McKinney-Vento Homeless Assistance Act (42 U.S.C. Sec. 11301 et seq.). The units described in this subparagraph shall be subject to a recorded affordability restriction of 55 years and shall be provided at the same affordability level as very low-income units.
- 20% of the units or more are for lower-income students who have a household income and asset level that does not exceed the level for Cal Grant A or Cal Grant B award recipients as outlined in paragraph (1) of subdivision (k) of Section 69432.7 of the Education Code and attend an accredited college full-time.

- Donation of at least one acre of land of sufficient size to permit the development of at least 40 units (with appropriate General Plan designation, zoning, permits, and approvals and access to the public facilities) to the City or San Mateo County for very low-income units.
- Senior housing (no affordable units required).
- Mobile home park age-restricted units for seniors (no affordable units required).

The amount of the density bonus is set on a sliding scale that is based on the percentage of affordable units at each income level and ranges from 5% to 80%. In general, the deeper the levels of affordability of a project, the higher the density bonus.

The City, through its inclusionary housing ordinance, requires that a minimum of 15% of all housing units in developments that are proposing ten or more units be affordable. The inclusionary housing ordinance also allows for a minimum density bonus of 20% per State law, as well as other incentives for the development of affordable housing. **The City's density bonus ordinance (Section 10.05.0430 of the Municipal Code) defers to current Government Code requirements.**

Assembly Bill 2345 went into effect on January 1, 2021, amending California Government Code Section 65915, and reducing the percentage of affordable units that a developer must provide to receive a density bonus. Under the law, developers can receive a maximum density bonus of 50% when a project provides one of the following:

- 15% of the total units for Very Low-Income households.
- 24% of the total units for Low-Income households.
- 44% of the total units for Moderate-Income households.

Assembly Bill 2345 amended Government Code 65915(d)(2), reducing the threshold for concessions and incentives for projects with affordable units. As of January 21, 2021:

- 2 incentives or concessions may be requested for projects that include at least 17% of the total units for lower-income households, at least 10% of the total units for very low-income households, or at least 20% for persons or families of moderate-income in a common interest development.
- 3 incentives or concessions may be requested for projects that include at least 24% of the total units for lower-income households, at least 15% of the total units for very low-income households, or at least 30% for persons or families of moderate-income in a common interest development.

Waiver or Reduction of Development Standards

If a city or county development standard would physically prevent a project from being built at the permitted density and with the granted concessions/incentives, a developer may propose to have those standards waived or reduced. A city or county is not allowed to apply any development standard which physically precludes the construction of the project at its permitted density and with the granted concessions/incentives. However, jurisdiction is not required to waive or reduce development standards that would cause a public health or safety problem, cause an environmental problem, harm historical property, or would be contrary to State law. The waiver or reduction of a development standard does not count as an incentive or concession and can apply to setbacks, lot coverage and open space, and building height requirements.

Maximum Parking Requirements

State density bonus law also imposes Statewide-parking standards equal to 1.5 spaces for two- and three-bedroom homes. Parking requirements for density bonus projects located near accessible major transit stops have lower parking standards. Per Government Code Section 65915(p)(3), local governments may no longer impose any parking requirements for

1. **100%** affordable rental housing projects located within 0.5 miles of an accessible major transit stop.
2. **100%** affordable senior rental housing projects that either offer paratransit service or are located within 0.5 miles from an accessible major transit stop.

Senate Bill 290, which amended Government Code Section 65915(p)(2) and became effective on January 1, 2022, prohibits cities from requiring more than 0.5 spaces per unit for projects that include:

1. **20%** lower-income units or at least **11%** very low-income units are located within 0.5 miles of an accessible major transit stop.
2. For-sale projects that include at least **40%** moderate-income units and are within 0.5 miles of an accessible major transit stop.

Importantly, in the City of Millbrae, **units that are constructed in satisfaction of the inclusionary housing ordinance (MMC 10.05.3300, see Section 5.5.7, below) may also be counted toward the number of affordable units required to qualify for a density bonus**.

As shown in Table 3-3, 5th Cycle Density Bonus Projects, several density bonus projects have been submitted during the 5th Cycle and have either been approved or are currently under review. These projects include a total of 791 new units, of which 97 (or 12%) are affordable. As shown in Chapter 8, Housing Plan, of this Housing Element, the City is taking on the following program to update its density bonus ordinance to comply with State requirements:

- **Program HIP-27, Update Density Bonus Ordinance.** Update the local ordinance to be consistent with State law, offering a greater density bonus than allowed by the default State standards. Continue applying the State density bonus standards until a local law is passed.

Table 3-3. 5th Cycle Density Bonus Projects

ADDRESS	STATUS	NO. OF UNITS	NO. OF AFFORDABLE UNITS
1100 El Camino Real	Approved	384	19
130 El Camino Real	Under Review	30	3
1301 Broadway	Approved	99	49
959 El Camino Real	Approved	278	26
Total		**791**	**97**

Source: *City of Millbrae*

3.3.4 Development Standards

Residential development standards established in the Zoning Ordinance are designed to protect and promote the health, safety, and general welfare of residents and to implement the policies of the Millbrae General Plan. These standards also help preserve the character and integrity of existing neighborhoods.

The development standards, as summarized in Table 3-4, Citywide Development Standards (Outside of Specific Plans), can affect the ability of property owners to construct and maintain housing. The development standards that are contained in the Zoning Ordinance, the MSASP, and the Downtown and El Camino Real Specific Plan are examined and discussed below, with an emphasis on their potential impacts on the production of housing in Millbrae. The Millbrae 2040 General Plan contains a program to conduct a comprehensive Zoning Code update between 2022 and 2025 to bring it into consistency with the new General Plan and Downtown and El Camino Real Specific Plan.

To facilitate transparency under Government Code, Section 65940.1(a)(1), the City's website provides links to the zoning map, zoning ordinance, and specific plans, which contain all the development standards for each parcel in the City. Additionally, various development application and developer impact fee information sheets, Planning and Development Services fee schedules, building permit fee schedules, and development application forms are available

online at https://www.ci.millbrae.ca.us/273/Planning-Forms-Other-Handouts Specifically, the City provides development impact fee information at and a fee schedule at https://www.ci.millbrae.ca.us/262/Development-Impact-Fees .

3.3.4.1 Citywide Development Standards (Outside of Specific Plans)

The majority of land in Millbrae is outside of any specific plan and defaults to the development standards that are contained in the Zoning Code. There are four (4) zones that allow residential uses by right and two (2) zones which allow residential uses with a CUP (see Table 3-4). Additionally, the Planned Development District allows residential uses through Planning Commission and City Council review and approval (see Section 3.3.6, Processing and Permitting Procedures).

Planned Development

Planned development districts allow more flexible design and allow densities up to that which is allowed by the General Plan. As such, planned development districts are not a constraint to residential development. They are permitted, but not mandatory, and are intended to facilitate diversification in the location of structures and other site qualities while ensuring adequate standards relating to public health, safety, welfare, comfort, and convenience. Plans for planned development are reviewed on a case-by-case basis through the submittal of a Precise Development Plan. The City of Millbrae has three areas designated as planned development, none of which are included in the sites inventory.

Table 3-4 summarizes the development standards for zones outside of the specific plan areas.

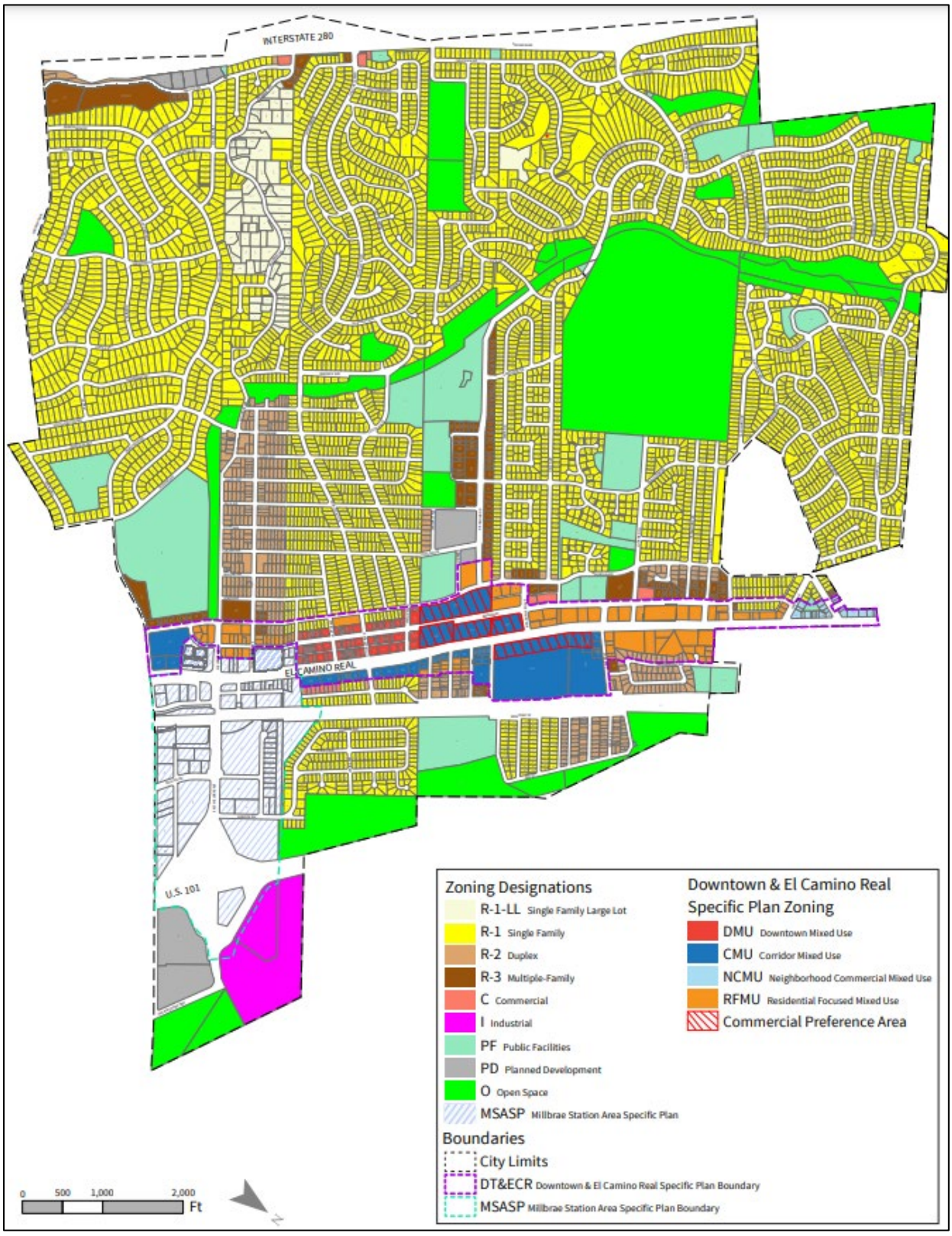
Table 3-4. Citywide Development Standards (Outside of Specific Plans)*

DISTRICT/ STANDARD	R-1LL	R-1	R-2	R-3	COMMERCIAL DISTRICT**
Max Height	30'/ 3 stories	30''/ 3 stories	30''/ 3 stories	40''/ 4 stories	40'/ 4 stories
Max Density (DUA)	1 unit per 10,000 sf	1 unit per 5,000 sf	1 unit per 2,500 sf	1 unit per 1,000 sf	N/A
Min Lot Area	50' width (+10' for corner lots) 10,000 sf	50' width (+10' for corner lots) 5,000 sf	50' width (+10' for corner lots) 5,000 sf (6,000 sf for corner lots) (7,000 sf for triplex lots)	50' width (+10' for corner lots) 5,000 sf (6,000 sf for corner lots)	25' width 2,500 sf
Setbacks	Front: 20' Side: 3'–5' Rear: 10'	Front: 20' Side: 3'–5' Rear: 10'	Front: 20' Side: 3'–5' Rear (duplex): 10' Rear (triplex): 15'	Front: 20' Side: 5'-20' Rear: 5'	None, but ten feet when adjacent to an alley or any "R" district.

DISTRICT/ STANDARD	R-1LL	R-1	R-2	R-3	COMMERCIAL DISTRICT**
FAR	0.55	0.55	0.88	No limit	No Limit
Open Space	Min. 1,000 sf of open uncovered space in the rear 1/3 of the lot	Min. 1,000 sf of open uncovered space in the rear 1/3 of the lot	Min. 1,000 sf of open uncovered space in the rear 1/3 of the lot	-	-
Lot Coverage	40%	50%	50%	75%	100%

** Does not include zones within the MSASP or DECRSP areas. See Tables 3-5 and 3-6.*
** Requires Conditional Use Permit but all sites in sites inventory will either be rezoned as part of the Downtown El Camino Real Specific Plan or have an approved project or project under review where the zoning is in the process/will be changed. No opportunity sites (i.e., sites without pipeline projects) will retain this zoning designation.

Figure 3-1. Millbrae Citywide Zoning Map



3.3.4.2 Millbrae Station Area Specific Plan

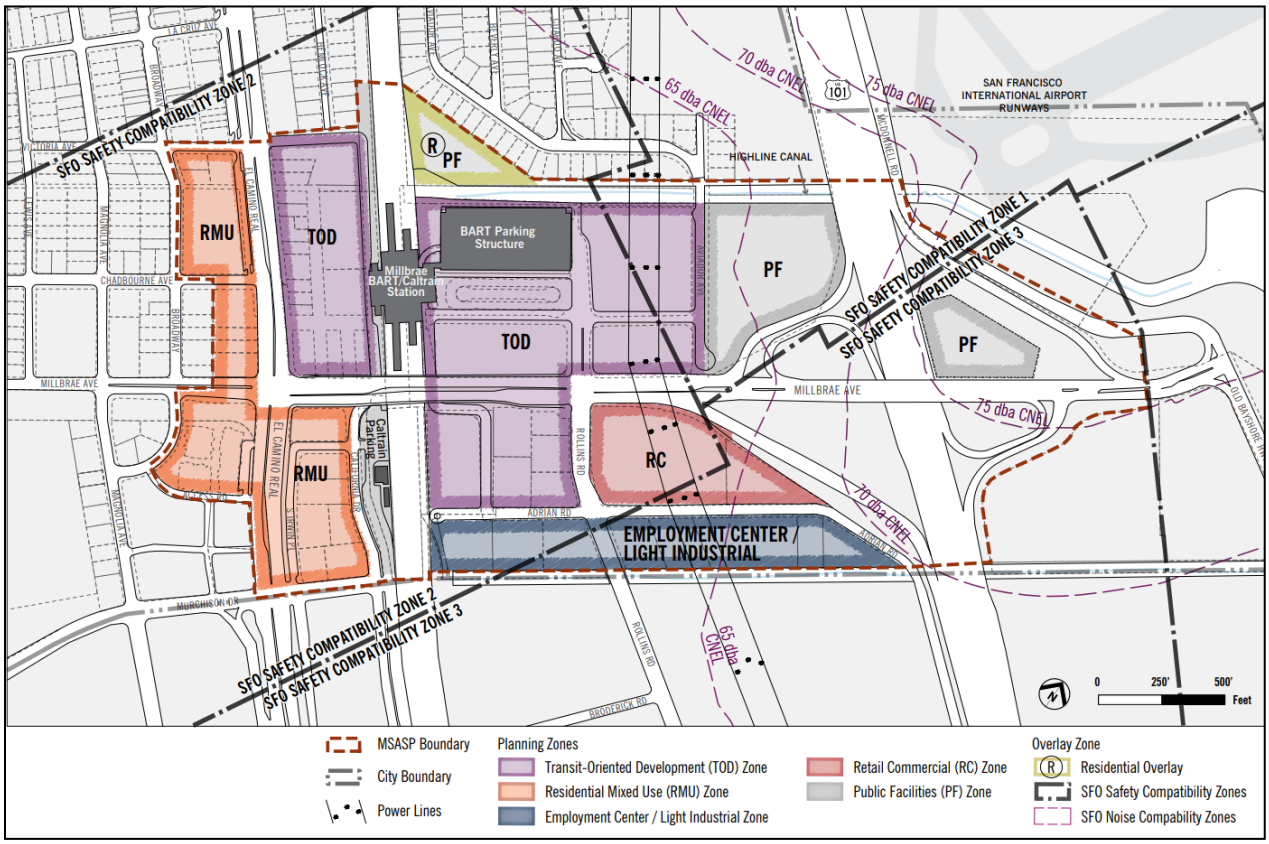
The MSASP was adopted in 1998 along with the current General Plan, and ahead of the opening of the Millbrae Station (2003), which serves transit lines from Caltrain and Bay Area Rapid Transit (BART). The plan was comprehensively updated in 2016 and has been amended several times since. The Plan area encompasses 16 acres and has five planning zones and one overlay zone. Because of its proximity to Millbrae Station and appropriateness for transit-oriented, high-density housing, it contains a separate set of development standards that allow higher densities than elsewhere in the City. Per the Plan's conceptual development program, 1,440 new residential units are planned.

Table 3-5. Millbrae Station Area Specific Plan Development Standards

DISTRICT/ STANDARD	TOD	RESIDENTIAL MIXED USE	EMPLOYMENT CENTER / LIGHT INDUSTRIAL	RESIDENTIAL OVERLAY
Max Height	90'-100'	65'	85'	35'
Min Height	2 Stories	2 Stories	2 Stories	-
Max Density (DUA)	80	60	40	30
MAX DUA w/ Community Benefits	Determined by height and setbacks	80*	60*	-
Min Lot area	-	-	-	-
Front Setbacks	Varies by frontage location rather than zone. See Figure 5.3 in the MSASP.			
Side, Rear Setbacks	5'	5'	5'	5'
FAR	2.5	2.0 / 2.5*	2.0 /2.5*	-
Publicly Accessible Open Space	10%	10%	10%	10%
Required Affordable Units	15%	15%	15%	15%

* *The higher DUA and FAR listed requires that the developer enter into a voluntary community benefits agreement and provide community benefits in exchange for greater project density. Community benefits include but are not limited to the construction of a greater percentage of affordable units than required by the inclusionary housing ordinance, public improvements, and transportation demand management plans. Increase density allowance and community benefits are negotiated and decided on a case-by-case basis and can be combined for increased density, subject to compliance with the SFOALUCP.*
Source: *City of Millbrae*

Figure 3-2. Millbrae Station Area Specific Plan Planning Zones Map



3.3.4.3 Downtown & El Camino Real Specific Plan

The Downtown and El Camino Real Specific Plan was developed concurrently with the Millbrae 2040 General Plan update. This Specific Plan covers approximately 95 acres of the City and will replace the current underlying zoning with new development standards. The Plan's conceptual development program plans for 3,130 new residential units. This is not a development cap, but the amount of likely development studied for environmental analysis and infrastructure demand projections. Note that the development standards for parcels in the Residential zone (those in yellow in Figure 3-3) default to the standards of the underlying zoning.

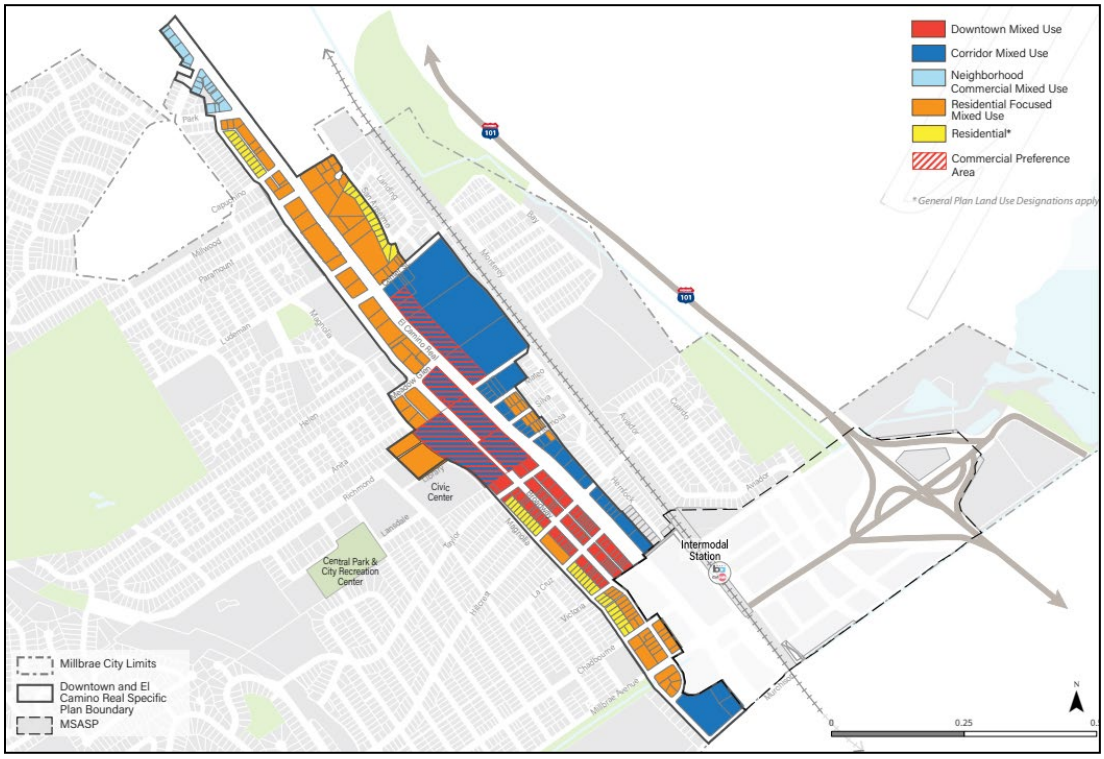
Table 3-6. Downtown and El Camino Real Specific Plan Development Standards

DISTRICT/ STANDARD	DOWNTOWN MIXED USE	CORRIDOR MIXED-USE	RESIDENTIAL FOCUSED MIXED USE	NEIGHBORHOOD COMMERCIAL MIXED USE	RESIDENTIAL
Max Height	See Figure 3-6				
Max Density (DUA)	25-50 if lot fronting Broadway Ave;	70-130	60-80	80	Underlying zoning

DISTRICT/ STANDARD	DOWNTOWN MIXED USE	CORRIDOR MIXED-USE	RESIDENTIAL FOCUSED MIXED USE	NEIGHBORHOOD COMMERCIAL MIXED USE	RESIDENTIAL
	70-110 if lot fronting ECR				
Min Setbacks (Broadway Frontage)	**Front**: 0' **Side**: 0' **Rear**: 0'	**Front**: 5' **Side**: 0' **Rear**: 10'	**Front**: 5' **Side**: 0' **Rear**: 5'	**Front**: 0' **Side**: 0' **Rear**: 0'	Underlying zoning
Min Setbacks (ECR Frontage)	**Front**: 0' **Side**: 0' **Rear**: 5'	**Front**: 5' **Side**: 5' if 23ldg. is ≤ 45' and all corners; 10' if 23ldg. > 45' **Rear**: 10' if lot < 150' deep, otherwise 20'	**Front**: 5' **Side**: 0' **Rear**: 15' only if east of ECR	**Front**: 0' **Side**: 0' **Rear**: 0'	Underlying zoning
FAR	3.5	3.5	2.5	2.5	Underlying zoning

Notes: *ECR = El Camino Real; DUA = dwelling units per acre*
Source: *City of Millbrae*

Figure 3-3. Downtown and El Camino Real Specific Plan Land Use Designations



3.3.4.4 Residential Density

Citywide (Outside of Specific Plan Areas)

The Zoning Ordinance allows for base residential densities ranging from four (4) dwelling units per acre in the R-1LL zone to up to 40 dwelling units per acre in R-3.

Millbrae Station Area Specific Plan

The Millbrae Station Area Specific Plan (MSASP) allows up to 80 dwelling units per acre in the Residential Mixed Use planning zone (in exchange for community benefits) and unlimited density in the TOD planning zone, provided height and setback standards are met.

Downtown & El Camino Real Specific Plan

The Downtown and El Camino Real Specific Plan (Specific Plan) allows densities of up to 130 dwelling units per acre in the Corridor Mixed Use land use designation, up to 110 dwelling units per acre on parcels within the Downtown Mixed-Use designation that front onto El Camino Real, and up to 80 dwelling units per acre in both the Residential Focused Mixed Use and Neighborhood Commercial Mixed-Use designations. Greater density may be achieved per the density bonus law. Residential densities outlined in the Zoning Ordinance, in the MSASP, and the Specific Plan may be exceeded on a case-by-case basis to encourage development of low- and moderate-income housing under State density bonus laws, and subject to the San Francisco Airport Land Use Compatibility Plan. See Section 5.5.7 below.

Conclusions

Through the adoption of both specific plans, the City created more opportunities for high-density residential development near transit, services, and employment. **Therefore, density requirements in Millbrae do not constrain housing development.**

3.3.4.5 Lot Size and Area

Citywide (Outside of Specific Plan Areas)

The current Zoning Ordinance establishes minimum lot areas for all residential zones outside of the MSASP and outside of any Planned Development areas. The minimum lot area varies from 5,000 square feet in R-1 to 10,000 square feet in R1-LL. Millbrae Station Area Specific Plan

Properties in the MSASP do not have minimum lot area standards. This allows for a range of housing options in Millbrae (Table 3-5).

Downtown & El Camino Real Specific Plan

Properties in the Downtown and El Camino Real Specific Plan area do not have minimum lot area standards. This allows for a range of housing options in Millbrae (Table 3-6).

3.3.4.6 Setbacks

Citywide (Existing)

All residential zones require 20-foot front setbacks. Side yard setbacks range from three (3) to ten (10) feet in R-1LL, R-1, and R-2, and 10% of the lot width (5 feet minimum, up to 20 feet max) in R-3. Required rear yard setbacks in these zones range from 10 to 15 feet. **These standards are typical for residential zones and do not constrain housing development.**

Millbrae Station Area Specific Plan

Within the MSASP, side setbacks range from 5 to 10 feet, depending on the zone. Requirements for front setbacks and upper floor setbacks within the MSASP vary by frontage location (See Figure 3-2). Most locations require only a 10-foot setback and a 20-foot setback for portions of buildings above 55 or 65 feet, depending on location. **These requirements are typical and do not pose a constraint to development.**

Downtown & El Camino Real Specific Plan

Within the Specific Plan area, side setbacks range from zero (0) to five (5) feet in the front, zero (0) to 10 feet on the sides, and zero (0) to 15 feet in the rear, depending on location. **These requirements are typical and do not pose a constraint to development.**

3.3.4.7 Lot Coverage and Required Open Space

Citywide (Outside of Specific Plan Areas)

The City imposes limits on building lot coverage in the residential zones, ranging from 40% maximum in R-1LL to 75% maximum in R-3. **This is typical for residential zones and does not pose a constraint on the type of developments that the zone is intended for.**

Millbrae Station Area Specific Plan

Land within the MSASP does not have maximum lot coverage requirements but requires that every project set aside 10% of the lot area for publicly accessible open space. The requirement for publicly accessible open space is typical for large developments. **Given that this is the only limitation on lot coverage, this does not pose a constraint.**

Downtown & El Camino Real Specific Plan

The Specific Plan does not regulate lot coverage but contains standards for private open space. Developments are required to provide 80 square feet of private open space per unit, and common open space at a rate of 150% of the sum of the private open space required. **Private and public open space standards are typical for large developments and do not pose a constraint.**

3.3.4.8 Maximum Floor Area Ratio

The floor area ratio in all parts of the City is measured by dividing the gross floor area divided by the net site area. The gross floor area is considered the sum of the gross horizontal areas of all floors of a building or other enclosed structure on the lot, measured from the outside perimeter of the exterior walls. The calculation includes all habitable space that is below the roof and within the outer surface of the main walls of the buildings, excluding basement areas.

Citywide (Outside of Specific Plan Areas)

Allowed floor area ratios (FARs) range from 0.55 in R-1LL to 0.88 in R-2. There is no maximum FAR in the R-3 zone. **These are typical limits on residential zoning and do not pose constraints for the type of development that the zones are intended for.**

Millbrae Station Area Specific Plan

The maximum FAR in the MSASP ranges from 2.0 to 2.5. In the TOD zone, the maximum FAR may be lifted in exchange for community benefits. **This is not a constraint on development.**

Downtown & El Camino Real Specific Plan

The maximum FAR in the Specific Plan area ranges from 2.5 to 3.5. The maximum FAR may be waived according to density bonus law. The City's inclusionary housing ordinance automatically qualifies multifamily housing projects for density bonuses under density bonus law. **This is not a constraint on development.**

3.3.4.9 Parking

Citywide (Outside of Specific Plan Areas)

The City requires a minimum of two (2) enclosed off-street parking spaces for every single-family, duplex, and triplex unit. Accessory dwelling units (ADUs) require an additional parking space unless exempt by proximity to transit in compliance with Government Code 65852.2. Parking requirements for multifamily developments of four or more units in R-3 require the following number of on-site spaces:

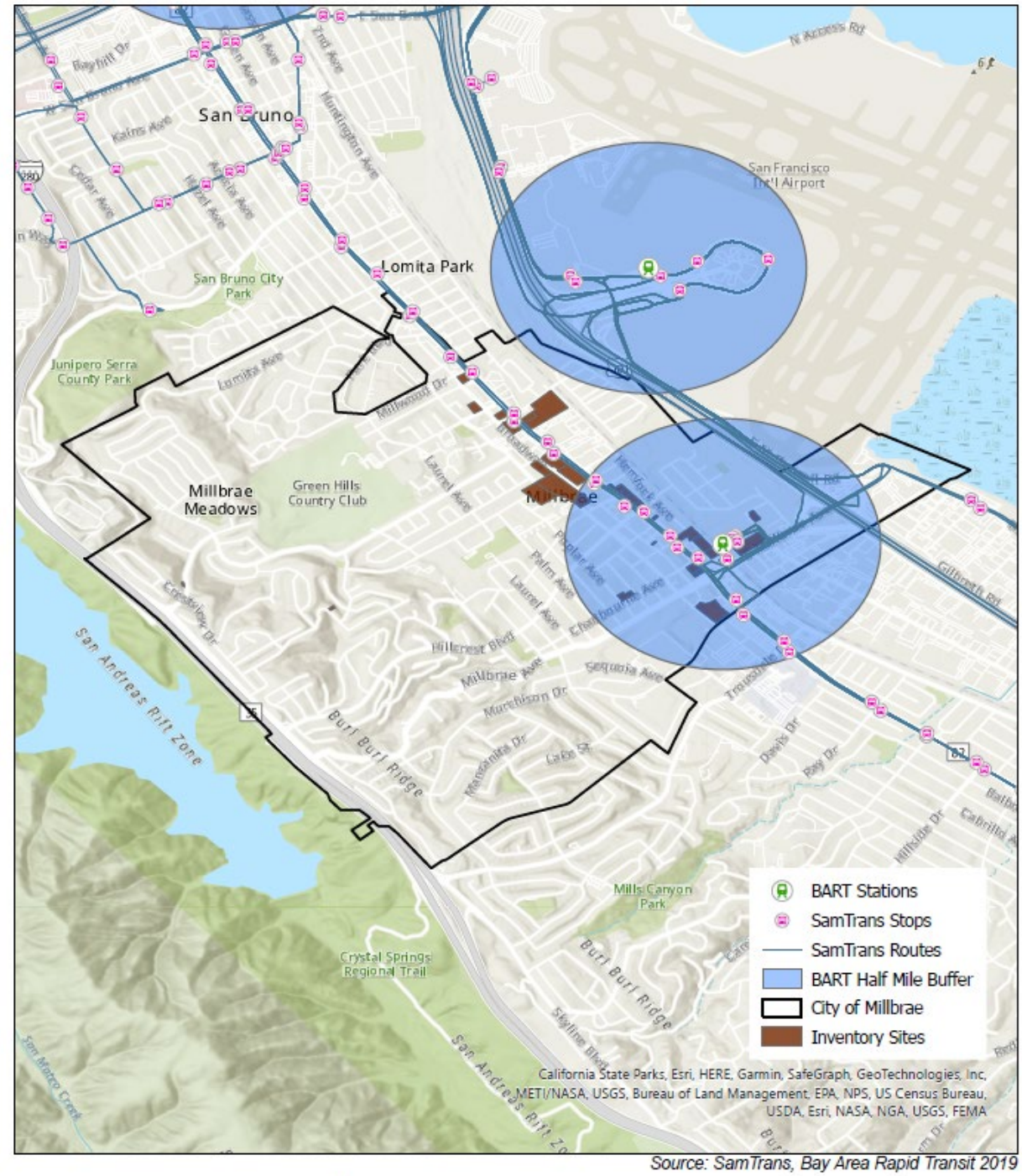
- Studio: one (1) garage space per unit
- One bedroom: one (1) and a half garage spaces per unit
- Two or more bedrooms: two garage spaces per unit

While the City requires some on-site spaces outside of specific plan areas, **Assembly Bill (AB) 2097 removes all parking requirements for most new developments located within one-half mile of specific transit stops** (in the case of Millbrae, this would be the Millbrae BART Station). However, AB 2097 allows for jurisdictions to require higher parking ratios if a specified parking study determines it is appropriate. As shown in Figure 3-4. Sites Inventory and Transit, there are sites from the Sites Inventory that fall outside of the ½ mile buffer to a BART Station. Additionally, the City has designated mixed-use zones that are outside of a ½ mile to a BART station. Although Millbrae's total number of required parking spaces is reasonable, as requirements for multi-family developments are equal to or less than requirements for single-family detached dwellings, the type of parking required poses a constraint to development costs.

Multifamily garage requirements can significantly impact various aspects of housing development, such as increasing construction costs due to the need for additional space, materials, and structural considerations. This can, in turn, affect the overall affordability of the units, potentially limiting the range of residents who can afford them. The inclusion of garages might also reduce the overall housing supply and ability to achieve maximum densities, as developers may be deterred by the increased costs and potential complexities. Furthermore, garage requirements could influence housing choices by favoring automobile-oriented lifestyles and deterring those who prefer alternative transportation options. To mitigate the constraints of the multifamily garage requirements, the City will update the Zoning Ordinance to remove garage parking requirements for multifamily development and offer flexible or alternative parking arrangements to facilitate multi-family housing and mixed-use construction, such as tandem parking and shared parking. The program below will move the Zoning Ordinance update forward:

- **Program HIP-48:** Reduced Parking Requirements.

Figure 3-4. Sites Inventory and Transit



Source: SamTrans, Bay Area Rapid Transit 2019

Harris & Associates

N

0 0.5 1 Miles

Sites Inventory and Transit

Millbrae Station Area Specific Plan

Assembly Bill (AB) 2097 removes all parking requirements for most new developments located within one-half mile of specific transit stops (in the case of Millbrae, this would be the Millbrae BART Station). However, AB 2097 allows for jurisdictions to require higher parking ratios if a specified parking study determines it is appropriate.

The entire MSASP area is within a half mile of transit and the Specific Plan boundary is along the El Camino Real corridor.

The MSASP requires 1.25 on-site spaces per unit, but only one (1) on-site space per unit if the development is within 600 feet of Millbrae Station. **However, developers who incorporate Transportation Demand Management (TDM) techniques including shared parking, employer TDM programs, subsidized transit passes, and rideshare incentives may negotiate with the City on reducing their parking requirement.** The following six sites are within the MSASP area and are subject to the MSASP parking requirements:

- **Site 17 (150 Serra Ave.):** Lower, Moderate, & Above Moderate-income site within 0.5 miles from the BART station.
- **Site 18 (130-140 El Camino Real):** Lower & Above Moderate-income site within 0.5 miles from the BART station.
- **Site 19 (300 Millbrae, Bldg. 6A):** Lower Income Only site within 0.5 miles from the BART station.
    - ***This site is 100% affordable and within a 0.5-mile radius of the Millbrae BART Station. Therefore, the City cannot impose parking requirements on this site.***
- **Site 20 (300 Millbrae, Bldg. 5B):** Moderate & Above Moderate-Income site within 0.5 miles from the BART station
- **Site 21 (39 El Camino Real):** Moderate-income Only site within 0.5 miles from the BART station
- **Site 22 (9 and 15 El Camino Real):** Moderate-income Only site within 0.5 miles from the BART station

As previously mentioned, despite the City's on-site parking requirements, **AB 2097 removes all parking requirements for most new developments located within one-half mile of specific transit stops** (in the case of Millbrae, this would be the Millbrae BART Station). **The entire MSASP area is within a half mile of transit and the Specific Plan boundary is along the El Camino Real corridor.** It is important to note that, AB 2097 allows for jurisdictions to require higher parking ratios if a specified parking study determines it is appropriate.

Downtown & El Camino Real Specific Plan

The Downtown & El Camino Real Specific Plan requires only one (1) on-site space per dwelling. In addition to the required one (1) on-site space per dwelling, multifamily developments require a visitor parking space for every ten units. However, **AB 2097 removes all parking requirements for most new developments located within one-half mile of specific transit stops** (in the case of Millbrae, this would be the Millbrae BART Station). **The entire MSASP area is within a half mile of transit and the Specific Plan boundary is along the El Camino Real corridor.**

The following 16 sites are within the DECRSP area and would be subject to the DECRSP parking requirements:

- **Site 1 (1395 El Camino Real):** Moderate-income Only site.
- **Site 3 (1201 El Camino Real):** Moderate-income Only site.
- **Site 4 (1121 and 1125 El Camino Real):** Moderate-income Only site.
- **Site 5 (1150 El Camino Real):** Lower Income Only site not within 0.5 miles from the BART station.
- **Site 6 (1100 El Camino Real):** Lower & Above Moderate-Income site.
- **Site 7 (979 Broadway):** Lower & Moderate-Income site.
- **Site 8 (959 El Camino Real):** Lower & Above Moderate-Income site.
- **Site 9 (West of Magnolia Ave. and Library Ave.):** Lower, Moderate, & Above Moderate-Income site.
- **Site 10 (537 Broadway):** Lower & Above Moderate-Income site within 0.5 miles from the BART station.
- **Site 11:** Lower & Above Moderate-Income site.
- **Site 12 (480 El Camino Real):** Above Moderate-income Only site within 0.5 miles from the BART station.
- **Site 13 (450 and 460 El Camino Real):** Lower Income Only site within 0.5 miles from the BART station.
- **Site 14 (400-420 El Camino Real):** Lower Income Only site within 0.5 miles from the BART station.
- **Site 15 (300 El Camino Real):** Above Moderate-income Only site within 0.5 miles from the BART station.

- **Site 16 (230 Broadway):** Above Moderate-income Only site within 0.5 miles from the BART station.
- **Site 24 (95 Murchison Dr.):** Lower & Above Moderate-Income site within 0.5 miles from the BART station.

Parking Relief

State law imposes the following parking maximums (i.e., a city or county may not require on-site parking above these ratios for density bonus projects) (Table 3-7, Maximum Parking Requirements for Density Bonus Projects)

Table 3-7. Maximum Parking Requirements for Density Bonus Projects

UNIT SIZE	MAXIMUM PARKING REQUIREMENT
Studio	1
One Bedroom	1
Two Bedroom	1.5
Three Bedroom	1.5
Four Bedroom	2.5

***Source**: City of Millbrae*

Parking requirements for low-income projects or projects located near accessible major transit stops with five (5) or more units have reduced parking standards. The reduced parking minimums vary by number of bedrooms, affordability level, and proximity to a BART station. In addition, State law no longer allows local governments to impose any parking requirements for:

- 100% affordable housing projects located within 0.5 miles from an accessible major transit stop; and
- 100% affordable senior housing projects that either offer paratransit service or are located within 0.5 miles from an accessible major transit stop.

Parking requirements for projects with at least 11% very low-income or at least 20% lower-income units that are located within 0.5 miles from an accessible major transit stop are limited to 0.5 space per unit. Senate Bill (SB) 290 (signed by Governor Newson in September 2021) expands this requirement to projects that provide at least 40% moderate-income units and are also within 0.5 miles of a major transit stop, except that the 0.5 spaces metric is per bedroom, and not per unit.

Two active development projects in Millbrae are utilizing the State density bonus law and SB-35 streamlining to bypass minimum parking requirements. A 30-unit mixed-use density bonus

project at 130 El Camino Real that is currently under review is an SB-35 project and does not require any parking. Similarly, a 99-unit mixed-use density bonus project at 1301 Broadway Avenue is also an SB-35 project and is not mandated to provide parking but provides 24 parking spaces.

Parking requirements in the specific plan areas are relatively low, and State density bonus law allows developers to provide affordable units in exchange for flexibility on parking. Recent state laws such as AB 2097 prohibit local agencies from imposing minimum parking requirements for residential and other development projects within a half mile of a high-quality transit corridor or a major transit stop. The entire MSASP area is within a half mile of transit and the Specific Plan boundary is along the El Camino Real corridor. However, minimum parking requirements continue to be a constraint to the production of market-rate housing, outside of the specific plan areas. The sites in the 6th Cycle Sites Inventory affected by parking requirements are broken down in the following way:

- Of the 26 sites in the Sites Inventory, 13 have a proposed or approved project in the pipeline (2, 6, 8, 12, 15, 16, 17, 18, 19, 20, 23, 25, 26).
- The remaining 13 are opportunity sites (Sites 1, 3, 4, 5, 7, 9, 10, 11, 13, 14, 21, 22, and 24).
- Four of the sites are 100% affordable and three of those are located within a 0.5-mile radius of the BART station. Therefore, three sites (Sites 13, 14, and 19) would receive parking relief from the City's requirements.

Despite parking requirements being relatively low and provide developers with flexibility, **the City included the following programs to further remove constraints related to parking requirements**:

- **Program HIP-25.** Parking Requirement Options in Downtown Area
- **Program HIP-42.** Implement Reduced Parking for Affordable Housing
- **Program HIP-48.** Reduced Parking Requirements

3.3.4.10 Height Limits

Height limits are 30 feet or 3 stories in residential zones outside of the specific plans and are significantly higher within the specific plans (this includes overlay zones). Because of Millbrae's proximity to the San Francisco Airport, limitations to building heights are also affected by the Airport Land Use Compatibility Plan (see Section 3.3.4.11).

It should be noted that the City's height limits may be able to be exceeded either through density bonus or in exchange for community benefits that are provided to the City, except in cases where

the additional height would conflict with the ALUCP. However, the density and unit calculations for all sites in the Sites Inventory do not include any additional density or concessions to increase building heights but are limited to the maximum allowed by the City's current zoning or the proposed zoning as contained in the Specific Plan (excluding density bonuses allowed by State law).

Citywide (Outside of Specific Plan Areas)

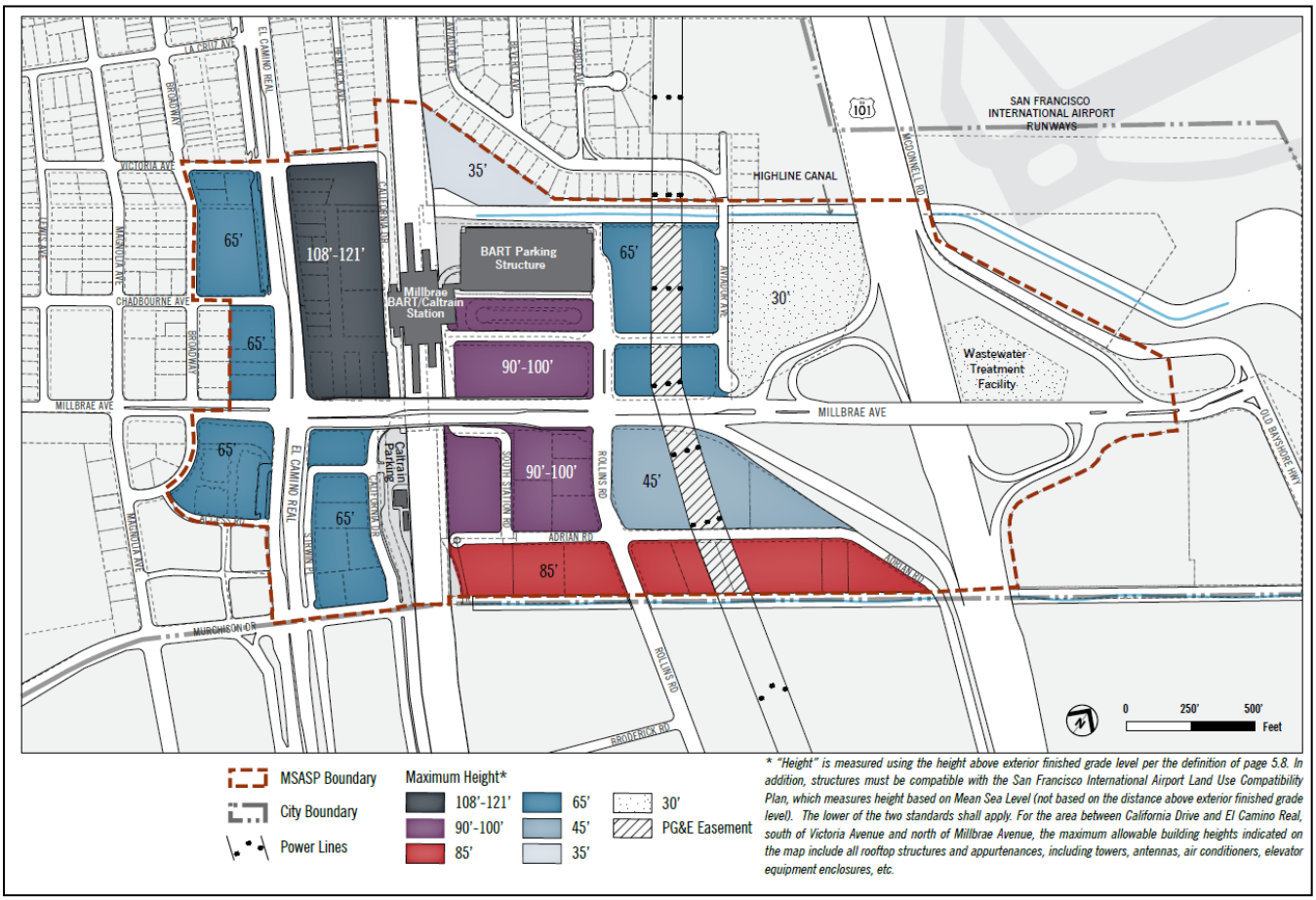
Land use regulations establish a height limit of 30 feet (or 3 stories) in the lower-density residential zones, including R-1 and R-2. In R-3, the height limit is 40 feet (or 4 stories) (See Table 3-4. Citywide Development Standards (Outside of Specific Plans). Some projects may exceed three stories given that height limitations are accounted as a net measure. Conventionally, urban planning practices have established an approximate height of 12 feet for a single story within building structures. However, Millbrae departs from this norm by employing a standard of 10 feet per story. Notably, this measurement is a net value and does not encompass the entirety of infrastructural space between each successive floor. Consequently, Millbrae permits building heights of up to 30 feet, thereby accommodating the construction of structures spanning three stories. This innovative approach reflects the City's nuanced consideration of spatial efficiency and design flexibility, aligning with the evolving architectural dynamics while ensuring the coherence of the urban landscape.

In addition of allowing up to three stories in residential zones, the City allows developers to propose projects exceeding three stories. Of the multifamily projects recently developed, all projects have exceeded three stories. Recently, one project outside of the Specific Plan areas (1301 Broadway) was approved ministerially under SB35. The City's height limits have not posed constraints on developer's in achieving maximum allowable densities.

Millbrae Station Area Specific Plan

The height limits in the MSASP are not correlated with the zones. As shown in Figure 3-5, maximum height for each parcel ranges from 30 – 121 feet (3 to 12 stories) throughout the MSASP area (See Table 3-5. Millbrae Station Area Specific Plan Development Standards).

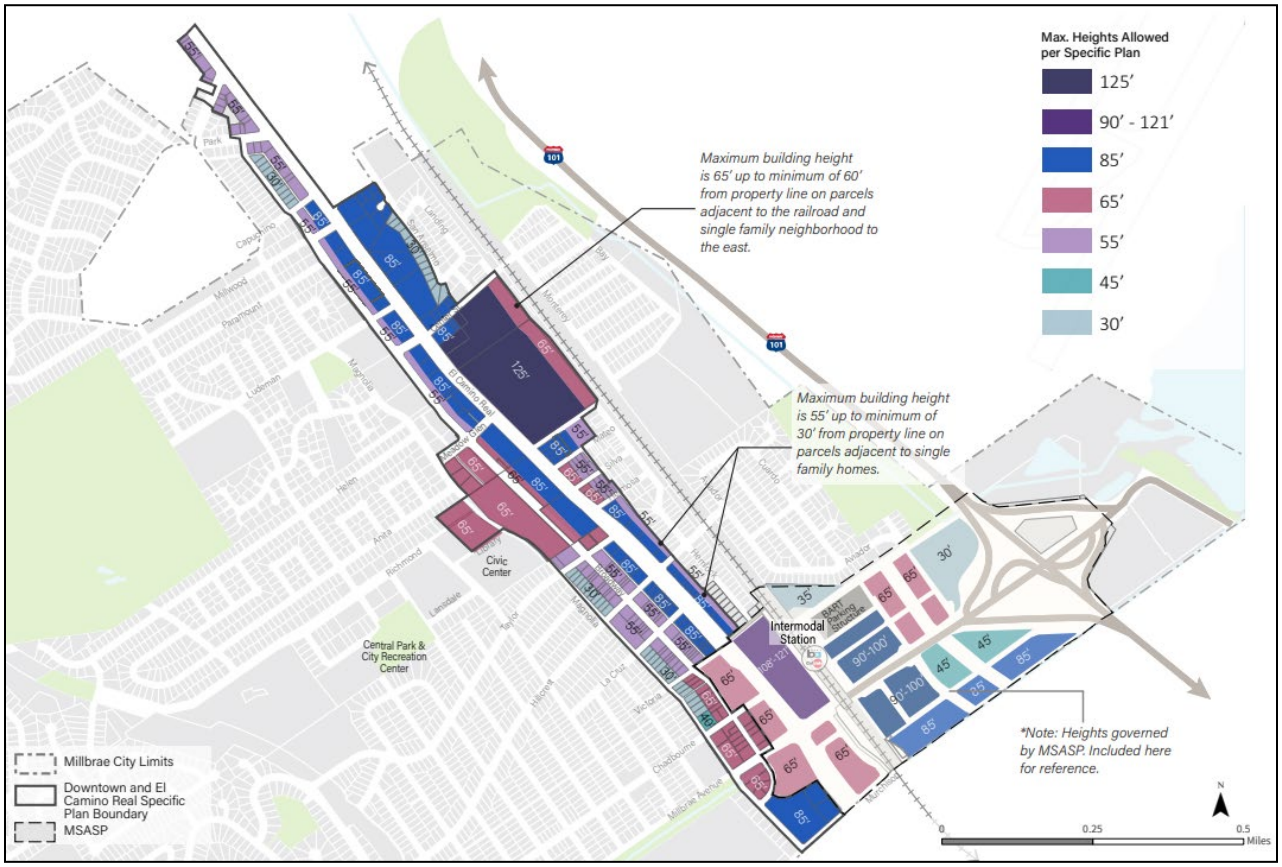
Figure 3-5. Millbrae Station Area Specific Plan Height Limits



Downtown & El Camino Real Specific Plan

The height limits in the Specific Plan are not correlated with the zones. As shown in Figure 3-6, maximum height for each parcel ranges from 30 – 125 feet (3 to 12 stories) throughout the DECR area (See Table 3-6. Downtown and El Camino Real Specific Plan Development Standards).

Figure 3-6. Downtown and El Camino Real Specific Plan Height Limits



Conclusion

Despite its proximity to the San Francisco Airport, which limits the City's ability to completely remove height limits, Millbrae's height limits range from 30 – 125 feet. In addition, the City gives developers some flexibility to exceed height limits using development tools such as density bonuses. Furthermore, Millbrae has made the effort to increase building height limits through the adoption of the Millbrae Station Area Specific Plan and the Downtown and El Camino Real Specific Plan. **Given the recent increase in height limits through the adoption of the Downtown and El Camino Real Specific Plan, Millbrae's flexibility to exceed height limits, and the City's considerable residential development activity, height limits do not constrain housing development.**

3.3.4.11 San Francisco Airport Land Use Compatibility Plan

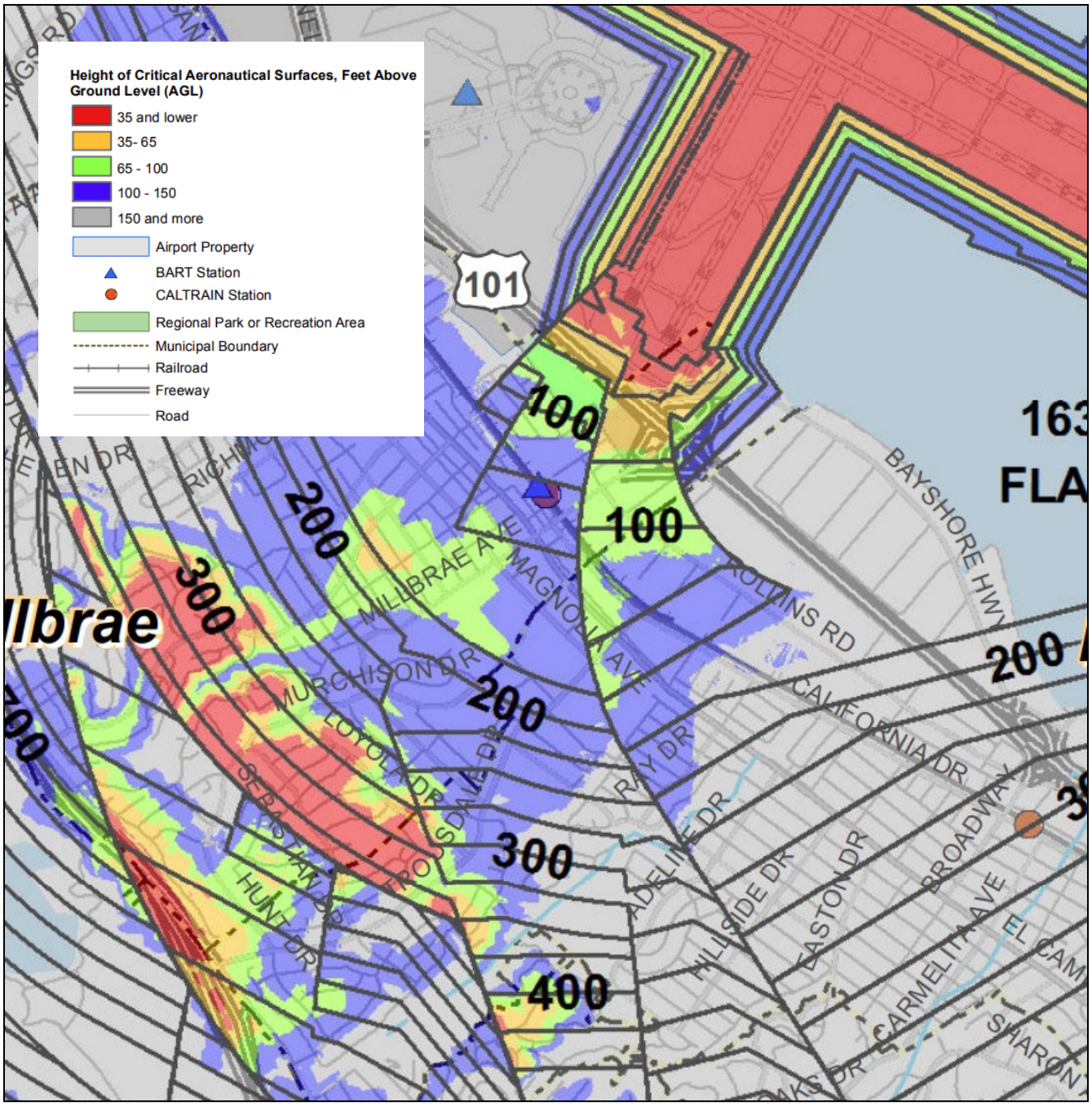
The San Francisco International Airport (SFO) is immediately adjacent to Millbrae. State law requires that land use commissions adopt an Airport Land Use Compatibility Plan (ALUCP), and use it to review the plans, regulations, and other actions by local agencies. The City/County Association of Governments (C/CAG) Board of Directors (acting as the Airport Land Use Commission for San Mateo County) prepared and adopted the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport (Compatibility Plan) in November of 2012. Included in this plan are land use restrictions for development near SFO, which intend to ensure that development in the areas surrounding SFO is compatible with airport activities. These restrictions include height limits on structures in the path of the runways.

The entirety of the City is located within Airport Influence Area (AIA) A, *Real Estate Disclosure Area,* and AIA B, *Policy/Project Referral Area.* Therefore, all proposed land use policy actions, including new general plans, specific plans, zoning ordinances, plan amendments, re-zonings, and land development proposals shall be reviewed by the ALUC. In addition to being within AIA A and AIA B, portions of the City are located within the Noise Compatibility Zones defined by the ALUC. As such, proposed land uses within the Airport noise compatibility zones shall be evaluated according to the noise/land use compatibility criteria provided in Table IV-1 of the ALUCP. The criteria identify the maximum acceptable airport noise levels, described in terms of Community Noise Equivalent Level (CNEL), for the indicated land uses. Finally, portions of the City are located within Safety Compatibility Zones 1, 2, 3, and 4 as defined by the ALUCP. The land use compatibility criteria for safety are outlined in Table IV-2 of the ALUCP and identify uses that are incompatible and uses that should be avoided in each zone.

Figure 3-7, Critical Aeronautical Surfaces , Critical Aeronautical Surfaces, from the Compatibility Plan, illustrates the critical aeronautical surfaces, which include those established by FAA Order 8260.38, Terminal Instrument Procedures (TERPS), and One Engine Inoperative (OEI) departures from Runways 19L and 19R (to the southeast). The exhibits depict the lowest elevations from the combination of the OEI procedure surface and all TERPS surfaces. The surfaces are defined with Required Obstacle Clearance (ROC) criteria to ensure safe separation of aircraft using the procedures from the underlying obstacles. These surfaces indicate the maximum height at which structures can be considered compatible with Airport operations Note that the contour labels in Figure 3-7, Critical Aeronautical Surfaces show elevations above mean sea level (MSL), as defined by the origin of the North American Vertical Datum of 1988 (NAVD88). Heights above the existing ground level are shown for informational purposes only as the MSL NAVD88 elevations are the controlling surfaces regardless of ground level. New facilities proposed in this area must also receive a Determination of No Hazard from the Federal Aviation Administration (FAA). This is a parallel process to the local Airport Land Use

Compatibility determination. Receipt of a Determination of No Hazard does not imply compatibility with the ALUCP.

Figure 3-7. Critical Aeronautical Surfaces



The areas in the City wherein the building height maximums could potentially affect the building heights allowed by the City are in the specific plan areas. The MSASP, which contains the development standards (including building height) for parcels with its boundaries was reviewed and approved by the Airport Land Use Committee (ALUC) on July 28, 2022. The General Plan and Specific Plan, which contain the development standards (including building height) for parcels with its boundaries, were sent to ALUC for review on June 20, 2022. The ALUC heard both items in their July 28, 2022, meeting and provided recommended revisions to the General Plan and Specific Plan. The City resubmitted the documents to the ALUC on August 5, 2022. The ALUC made a determination of consistency with the Airport Land Use Compatibility Plan at their August 25, 2022, meeting. The C/CAG Board of Directors, acting as the Airport Land Use Commission, made a final determination of consistency at their October 2022 meeting. **Therefore, Millbrae's proximity to the San Francisco Airport does not represent a constraint to housing development** because all building heights contained in the City's current zoning ordinance have been reviewed and approved by ALUC.

3.3.4.12 Cumulative Impacts of Development Standards

The cumulative impacts of Millbrae's development standards established in the Zoning Ordinance and specific plans do not unduly constrain achieving the densities permitted by the City. This is evident, as high-density developments have consistently achieved the maximum permitted densities permitted by the zones, as documented in Table 7-3, Entitled and Pending Development Applications in Chapter 7 of this Housing Element. Higher densities are also frequently achieved pursuant to State Density Bonus Law or other provisions, as also shown in Table 7-3. The components of the City's residential development standards are as follows:

- The Zoning Ordinance and specific plans allow residential properties with densities ranging from 4-130 units per acre. As discussed in Section 3.3.4.4, the maximum allowable densities are not a constraint to development.
- The Zoning Ordinance establishes minimum lot areas for all residential zones outside of the Millbrae Station Area Specific Plan and Planned Development areas. The minimum lot area varies from 2,500–10,000 square feet. Furthermore, properties in both specific plan areas do not have minimum lot area requirements. As discussed in Section 3.3.4.5, the lot size and area requirements for residential development are not a constraint.
- The Zoning Ordinance establishes minimum setbacks for all residential zones outside of the specific plan areas. The Zoning Ordinance requires residential developments outside of the specific plan areas to have a 20 feet front setback, a 3-20 feet side yard setback, and a 10-15 feet rear yard setback. On the other hand, residential developments in the specific plan areas are required to have a 0-5 feet front setback, a 0-10 feet side setback,

and a 0-15 feet rear yard setback. As discussed in Section 3.3.4.6, the lot size and area requirements for residential development are not a constraint.

- The Zoning Ordinance imposes limits on building lot coverage in residential zones outside of the specific plan areas, ranging from 40-75%. The specific plans, however, do not regulate lot coverage. Instead, projects are required to set aside 10% of the lot area and 80 square feet of publicly accessible open space in the Millbrae Station Area Specific Plan and Downtown and El Camino Real Specific Plan, respectively. As discussed in Section 3.3.4.7, the limits on building lot coverage and open space requirements for residential development are not a constraint.
- The Zoning Ordinance and specific plans have maximum floor area ratio requirements ranging from 0.55-0.88 in the areas outside of the specific plan area, 2.0-2.5 in the Millbrae Station Area Specific Plan area, and 2.5-3.5 in the Downtown and El Camino Real Specific Plan area. As discussed in Section 3.3.4.8, the floor area ratio requirements are not a constraint to residential development.
- The Zoning Ordinance and specific plans require 1-2 parking spaces per dwelling, depending on a development's location and proximity to public transit. Parking requirements in the specific plan areas are relatively low, State density bonus law allows developers to provide affordable units in exchange for flexibility on parking, and recent state laws such as AB 2097 prohibit local agencies from imposing minimum parking requirements for residential and other development projects within a half mile of a high-quality transit corridor or a major transit stop. **To further reduce parking requirements, the City is including Programs HIP-25 and HIP-42 to increase flexibility and reduce requirements.**
- The Zoning Ordinance and specific plans have height limits ranging from 30 – 125 feet. As discussed in Section 3.3.4.10, the height limits for residential development are not a constraint.

As demonstrated by this analysis of development standards and the City's development trends, residential development is not constrained by the City's standards. When compared to the rest of the Bay Area, Millbrae offers lower requisites and more flexibility for residential development. **As such, there are no negative impacts on development cost, housing supply, affordability, timing, approval certainty, housing choice, and ability to achieve maximum densities.** Still, the City included the following programs to further remove constraints:

- **HIP-14.** Conduct a Residential Development Feasibility Study
- **HIP-25.** Parking Requirement Options in Downtown Area

- **HIP-27.** Update Density Bonus Ordinance
- **HIP-42.** Implement Reduced Parking for Affordable Housing

3.3.5 Fees and Exactions

Housing developers typically conduct a financial feasibility analysis, or a pro forma analysis, which compares the cost of developing with the revenues received in rent or sales prices before embarking on a housing project. This analysis also calculates the rate of return on the project or investment. Like all businesses, developers require a minimum profit (and not a loss) or rate of return on housing projects, and revenues must exceed costs to the level where this rate of return is achieved. Housing development requires investors, who in turn require a rate of return on their investment. Fees and exactions add to the cost of developing housing, and developers include these fees in the financial feasibility/pro forma analysis mentioned above. If revenues do not outweigh costs (including a required rate of return), developers will not build projects. Development impact fees and community development services fees can add significant costs to development projects.

3.3.5.1 Development Impact Fees

Development impact fees are assessed on new development projects to help offset the costs of public capital facilities and infrastructure needed to serve new demand that is created by development projects. Assembly Bill 1600 (commonly known as the Mitigation Fee Act), enacted by the State in 1987 created Section 66000 et. Seq. of the Government Code. AB1600 requires public agencies to satisfy the following requirements when establishing, increasing, or imposing a fee as a condition of approval of a development project:

- Identify the purpose of the fee.
- Identify the use for the fee.
- Determine how there is a reasonable relationship between the fee's use and the type of development project on which the fee is imposed.
- Determine how there is a reasonable relationship between the need for the public facility and the type of development project on which the fee is imposed.
- Determine how there is a reasonable relationship between the amount of the fee and the cost of the public facility or portion of the public facility attributable to the development on which the fee is imposed.

The fees must be based on a rational nexus between new development and the costs of the capital facilities and infrastructure needed to accommodate such development. The fees do not pay for operation and maintenance of capital facilities, or City staffing costs.

On June 9, 2020, the City Council adopted Ordinance No. 777 adding the Millbrae Municipal Code, Article XXXI of Chapter 10.05.3100 et seq. development impact fees by adopting Resolution No. 20-35 *following the preparation of a legally compliant nexus study pursuant to the requirements of Government Code 66000*. This nexus study was led by a California-licensed civil engineer and can be accessed at the following location:

https://www.ci.millbrae.ca.us/DocumentCenter/View/526/Ordinance-No777---Citywide-Development-Impact-Fees-Ordinance-Adoption-PDF The citywide Development Impact Fees were effective on August 8, 2020 (and are adjusted each year on January 1st based on the Engineering News Record Construction Cost Index (CCI) for the San Francisco Bay Area) and include the following:

- Citywide development impact fees: Automatically adjusted on January 1st of each year in accordance with the change in the Engineering Construction Cost Index, as most recently published by Engineering News Record, for the previous calendar year.

MSASP development impact fees: Automatically adjusted sixty days following the end of the City's fiscal year (June 30th of each year) in accordance with the change in the Engineering Construction Cost Index, as most recently published by Engineer News Record, for the elapsed time period from the previous July 1st.

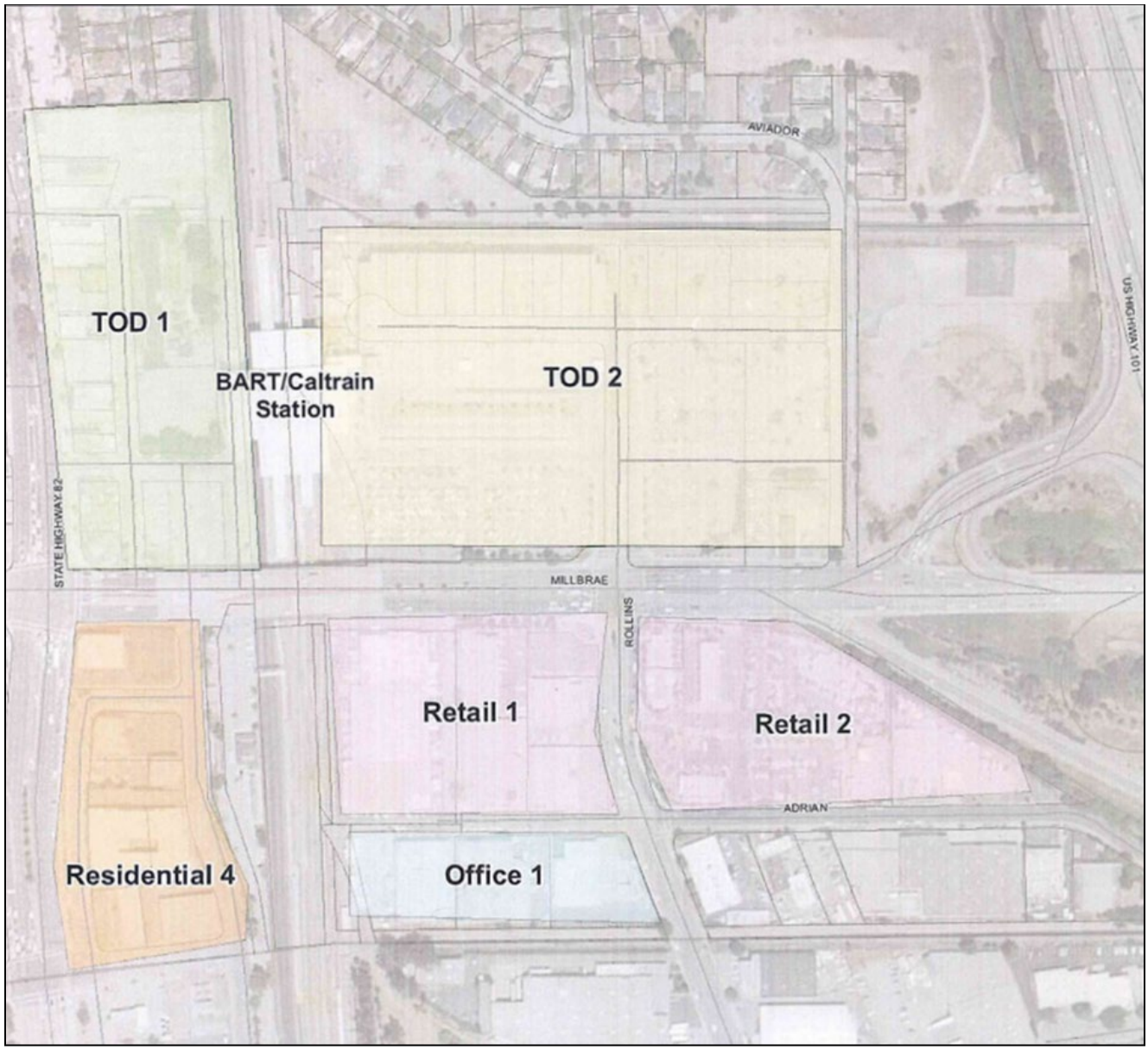
- Figure 3-8 depicts the locations within the Plan area where different impact fees apply (see also Table 3-8. Summary of Citywide and MSASP Development Impact Fees (per unit)).

Table 3-8. Summary of Citywide and MSASP Development Impact Fees (per unit)

LOCATION	SINGLE-FAMILY	MULTIFAMILY
Citywide:	$75,274.42	$55,073.96
MSASP TOD* 1&2:	NA	$58,885.01
MSASP* Res 4:	NA	$59,015.15

**See*
***Figure 3-8**, MSASP Fee Map*
***Source:** City of Millbrae Development Impact Fees*

Figure 3-8. MSASP Fee Map



Citywide Development Impact Fees (including the Specific Plan)

In June 2020, the City Council adopted (by ordinance) updated development impact fees. These fees are subject to annual indexing every January 1 and are posted on the City website.

There are seven types of Development Impact Fees: a library fee, a general government facilities fee, a recreation services fee, a public safety fee, a park acquisition and facilities fee, and a mobility fee. A description of each fee is provided below.

- **Library**. The purpose of the Library Fee is to fund new library facilities or improvements to existing library facilities to maintain the City's existing level of service. New residential and nonresidential development will bring additional residents, workers, and visitors to the City, increasing the demand for existing library facilities. The Library Fee is based on the cost per capita of the library assets necessary to provide the current level of service.

- **General Government Facilities**. The General Government Facilities Fee will be used to fund new general governmental facilities or improvements to existing general governmental facilities that are not covered by another impact fee to maintain the City's existing level of service. An increase in residential and non-residential development generates additional residents and workers that increase the need for government facilities to maintain the City's existing level of service.

- **Recreation Service**. The Recreation Services fee is to fund new development's share of planned new recreation facilities or improvements to existing recreation facilities. New residential and nonresidential development will bring additional residents, workers, and visitors to the City, increasing the demand on existing recreation facilities. The Recreation Services Fee will generate revenue to fund new development's share of planned Recreation Center, and other improvements.

- **Public Safety**. The Public Safety Fee is to fund new public safety facilities or improvements to existing public safety facilities to maintain the City's existing level of service. New residential and nonresidential development will bring additional residents, workers, and visitors to the City, increasing the demand for existing public safety facilities. The Public Safety Fee will generate revenue to fund new public safety facilities or improvements to existing public safety facilities to maintain the City's existing level of service. Development within the MSASP area is already subject to a fee that includes a public safety component. Projects in the MSASP area are required to pay the Citywide Public Safety Fee and with the portion of the MSASP fee paid credited towards the total fee payment (described in the next section).

- **Park Acquisition and Facilities**. The fee is to fund park acquisition and new park facilities or improvements to existing park facilities to maintain the City's existing level of service. New residential and nonresidential development will bring additional residents, workers, and visitors to the City, increasing the demand on existing park facilities. The Park Acquisition and Facilities Fee will generate revenue to fund the acquisition of parks and new park facilities or improvements to existing park facilities to maintain the City's existing level of service. An increase in residential and non-residential development generates additional residents and workers that increase the need for park facilities to maintain the City's existing level of service. The City also requires dedication of parkland in connection with subdivision maps, and as part of the MSASP impact fee (described in

the next section). Projects that pay this fee will receive a credit based on other park fees paid or land dedicated to the City as part of a subdivision.

- **Mobility**. The purpose of the Mobility Fee is to fund new development's share of planned pedestrian and bicycle improvements. New residential and nonresidential development will bring additional residents, workers, and visitors to the City, increasing the demand on existing mobility facilities. The Mobility Fee will generate revenue to fund the new mobility facilities or improvements to existing mobility facilities detailed in the Fee Study. The Mobility Fee is based on the new development's share of the planned mobility improvements stated in the Fee Study as determined by the trip generation rate of the new development. Development within the MSASP area is already subject to a fee that includes a transportation component (described in the next section). Projects in the MSASP area will receive a credit against the Mobility Fee. Projects within a half mile of a transit stop are also eligible for a discount on this fee.

- **Administration**. The Administration Fee amounting to 5% of each fee to cover legal, accounting, other administrative support, and administrative costs including revenue collection, revenue, and cost accounting, mandated public reporting, and fee justification analysis.

Consistent with Government Code Section 65852.2(f)(3), accessory dwelling units up to 750 square feet are exempt from development impact fees, and ADUs in excess of this size are charged proportionately in relation to the square footage of the primary dwelling unit based on the Single-Family Residential Fee, which is currently $71,309.30.

MSASP Development Impact Fees

Updated MSASP development impact fees were established in February 2017 by City Council ordinance (the fees for the MSASP were originally established in 2000). The ordinance sets out a protocol for adopting impact fees, details when the fees will be paid, establishes exemptions, and credits, implements procedures for appeals and refunds, and provides for reporting and accounting procedures. The fees, subject to annual adjustment every July 1 based on actual construction cost index increases, were established, and imposed within the MSASP area to finance the cost of the following categories of facilities:

- **Sewer – Utilities infrastructure**. The fees will fund Rainfall Infiltration Inflow (RDII) and gravity main improvements needed to provide adequate sewage treatment services to the MSASP. The RDII improvements are required to serve the whole MSASP area, while an additional fee will only apply in the specific subareas of the MSASP which the gravity main improvements will serve.

- **Transportation – Traffic improvement measures**. This fee is intended to help maintain acceptable transportation operation in the Specific Plan Area, including for users of alternative modes. The Nexus Study stated that in combination with grant and other funding, fee revenue will be used to fund the required new transportation facility improvements including roadway and alternative mode facility improvements.
- **Parks and recreation facilities**. The fee will fund the provision of additional parks and recreation land and facilities sufficient to maintain the City's existing service standards. Fee revenues will contribute funding towards the acquisition of parkland as well as the improvement of parkland/recreational facilities.
- **Public Safety**. The fee helps ensure there are sufficient fire facilities and equipment to serve new MSASP development. Fee revenues will be used to replace capital equipment as required, such as the acquisition of new public safety vehicles, motorcycles, and associated equipment, and to provide upgrades to the Millbrae Fire Station #37.

3.3.5.2 Community Development Service Fees

While development impact fees offset the costs of improvements serving the development, Community Development services fees cover review and processing of the development by City staff. The City's fee schedule is based on typical anticipated costs associated with the review and approval of proposed projects. Millbrae's current planning and development fee schedule for residential projects is summarized in Table 3-9, Planning Fees for Residential Projects.

Table 3-9. Planning Fees for Residential Projects

FEE NAME	SINGLE-FAMILY	MULTIFAMILY
Impact Fees (Total)	Citywide: $75,274.42	Citywide: $55,073.96 MSASP TOD* 1& 2: $58,885.01 MSASP* Res 4: $59,015.15
Design Review	$7,517	$10,022
Conditional Use Permit	Minor: $6,264 Major: $17,539	Minor: $6.264 Major: $17,539
CEQA	Categorical Exemption: $250 Negative Declaration: $3,758	Categorical Exemption: $250 Negative Declaration: $3,758 EIR: Varies
Development Agreement	NA	Varies
Zoning Amendment	$21,798	$21,798
General Plan / Specific Plan Amendment	$27,248	$27,248

Subdivisions	Lot Line Adjustment: $2,506 Parcel Map: $3,758 Tract Map: $6,264		Lot Line Adjustment: $2,506 Parcel Map: $3 758 Tract Map: $6,264	
MSASP Development Plan	NA		≤ 1 Acre: $43,597 Deposit > 1 Acre: $49,047 Deposit	
PD Development Plan	NA		≤ 1 Acre: $43,597 Deposit > 1 Acre: $49,044 Deposit	
Large Project (> 50 Units)	NA		$10,899	
Building Permit	Valuation $2,000 $10,000 $25,000 $50,000 $100,000 $500,000 $1,000,000 $5,000,000	Fee $462.08 $1,263.62 $1,725.70 $2,527.25 $ 3,602.64 $5,403.96 $ 9,511.62 $33,402.45	Valuation $2,000 $10,000 $25,000 $50,000 $100,000 $500,000 $1,000,000 $10,000,000 $25,000,000	Fee $395.28 $996.44 $2,794.43 $4,014.39 $ 5,891.33 $9,399.99 $13,646.27 $95,963.04 $240,463.88
Plan Review	70% Of Building Permit Fee		70% Of Building Permit Fee	

*See Figure 3-8, MSASP Fee Map

***Source**: City of Millbrae Service and Fee Schedule, January 1, 2020*

3.3.5.3 Comparable Fees (Other Cities)

Table 3-10, Comparison of Residential Development Fees for Residential Projects, outlines the various planning-related fees charged by Millbrae, with a comparison of similar fees charged by neighboring cities. It is important to note that fees in the City are similar to those in nearby jurisdictions and fees can vary significantly among jurisdictions based on the year the fees were updated.

Table 3-10. Comparison of Development Fees for Residential Projects

JURISDICTION	MULTIFAMILY DESIGN REVIEW	GENERAL PLAN AMENDMENT	ZONE CHANGE	TENTATIVE TRACT MAP	VARIANCE
Millbrae	$30,000 deposit for projects with 10 to 49 units $45,000 deposit for projects with 50 or more units	$20,000 (deposit)	$15,000 (deposit)	$6,596	$1,582 (reduced to 25% of the fee if application includes design review)
South San Francisco	$28,278 for 4-25 units $41,368 for 25 or more units	$32,276	$32,119	$17,926	$20,771

JURISDICTION	MULTIFAMILY DESIGN REVIEW	GENERAL PLAN AMENDMENT	ZONE CHANGE	TENTATIVE TRACT MAP	VARIANCE
Burlingame	≤ 25 units: $2,326 > 25 units: $3,434 Plus 10 units or less $4,018 11-25 Units $4,720 26-50 units $5,539 51-100 units $6503 101 or more units $7,636 Design Review Noticing Fee $1,067	$8,654	$8,654	$4,597 + deposit + $280 per lot (after 5th) + consultant costs Condo: $3,739 + $703 per unit (after 4th) + consultant costs	$5,162
San Mateo County	$3,489	$15,549	$15,549	$15,549+ $234 per lot (after 5th)	$1,782 (+ $1,706 if public hearing required)
Redwood City	$5,000 (deposit)	$15,250 (deposit)	$15,250 (deposit)	$15,250 (deposit)	$3,569
Belmont	$10,950 + $4,948 (Engineering Fee)	$16,153	$16,153	$12,426 + $15,191 (Engineering Fee)	$4,660
San Carlos	$22,311	$12,570	Major: $25,139 Moderate: $12,570 Minor: $6,285	5 or more lots $25,139 Up to 4 lots $3,771	$12,570
San Mateo	$5,000 (deposit for outside consultant) plus $25,000 pre-application plus $50,000 Planning Commission review	$100,000 (deposit; Planning Commission and City Council decision)	$6,000 (Zoning Administrator decision) $10,000- 50,000 (Planning Commission decision) $100,000 (deposit; Planning Commission and City Council decision)	$6,000 (Zoning Administrator approval)	$6,000 (Zoning Administrator approval) $10,000- 50,000 (deposit; Planning Commission decision) $100,000 (deposit; Planning Commission and City Council decision)

***Source**: City of Millbrae Service and Fee Schedule, January 1, 2020;*
City of South San Francisco Fee Schedule, effective July 11, 2022
City of Burlingame Master Fee Schedule, effective July 1, 2018
County of San Mateo Planning Service Fee Schedule, effective October 5, 2018
City of Redwood City Fee Schedule, effective July 1, 2022
City of Belmont Master Revenue Schedule, as amended through June 14, 2022
City of San Carlos Cost of Services, Fiscal Year 2021-2022
City of San Mateo Adopted Comprehensive Fee Schedule, effective July 1, 2023, to June 30, 2024

3.3.5.4 Typical Cost for Development Impact Fees and Building Permit Fees

The City of Millbrae provides a fee schedule for the development impact fees per typical residential unit. Table 3-11. Citywide Development Impact Fees by Typical Residential Unit summarizes the development impact fees per unit for each typical residential unit. The total cost of impact fees for a single-family unit is $75,274.41 and $55,073.96 for a multifamily unit. Although impact fees provide necessary city services, they may pose constraints to development costs. The highest development impact fee is the Citywide Park Acquisition and Facilities which accounts for 85% of the total development impact fees. Although the City has not lost any housing units in the past five years due to development impact fees, the City will adopt the following program to further the mitigation efforts of constraints caused by development impact fees:

- **Program HIP-35**. Assist with the Development of Lower-Income Housing

Table 3-11. Citywide Development Impact Fees by Typical Residential Unit

LAND USE	LIBRARY	GENERAL GOV. FACILITIES	RECREATION SERVICES	PUBLIC SAFETY	PARK ACQUISITION & FACILITIES	MOBILITY	ADMIN.	TOTAL
Single-Family	$252	$1,234	$3,389	$1,348	$63,284	$2,181	$3,584	$75,274
Multifamily	$186	$909	$2,496	$993	$46,631	$1,234	$2,622	$55,073

Source: *City of Millbrae Development Impact Fees, latest fees as of July 1, 2023*

As shown in Table 3-12, Overall Development Cost for Typical Residential Unit, combining planning/processing fees and development impact fees, a developer can expect to pay approximately $97,756 in fees per single-family unit and $55,186 to $68,237 in fees per multifamily unit, depending on the size of the project and location within the City. Furthermore, Table 3-13, Typical Building Permit and Development Impact Fees (Recent Developments) shows the fees paid by two recent developments. **As shown in Table 3-13, the actual fees per unit are similar to the estimated fees per unit shown in Table 3-12, supporting the fact that the current fees are financially feasible for developers and, therefore, not a constraint to development.**

Table 3-12. Overall Development Cost for Typical Residential Unit

DEVELOPMENT COST	SINGLE-FAMILY	MULTIFAMILY (10 UNITS)	MULTIFAMILY RENTAL (100 UNITS)
Estimated Fees Per Unit	$97,756	$68,237	$55,186
Estimated Cost of Development per Unit[1]	$2,826,000	$507,000	$451,000
Estimated Percent Fee Cost to Overall Development Cost	3.4%	13.5%	12.2%

[1] *Development costs are based on Century Urban's estimates of the cost to build in San Mateo County (April 2022), and land prices per Federal Housing Finance Agency and ParcelQuest data. Assumes single-family unit is 2,600 sf and multifamily unit averages between 750 square feet (100 units) – 850 square feet (10 units).*

Source: *21 Elements Constraints Survey, December 2021 (for fees) Century Urban Cost to Build in San Mateo County, Federal Housing Finance Agency, and ParcelQuest, 2021-2022 (for development cost).*

Table 3-13. Typical Building Permit and Development Impact Fees (Recent Developments)

FEE NAME	SINGLE-FAMILY (244 South Ashton)	MULTIFAMILY (126 Rollins, 320 Units)
Development Impact Fees (per dwelling unit)	$75,274.42	$55,073.96
Building Permit Fees (per dwelling unit)	$18,150.59	$161,837.51 / 320 du = $505.74
Total Fees (per dwelling unit)	**$93,425.01**	**$55,579.70**

*See Figure 3-8, MSASP Fee Map

***Source**: City of Millbrae Service and Fee Schedule, January 1, 2020*

In exploring the existence of current development costs as a possible hurdle to the City's ability to develop more affordable housing, a review of comparative costs among their neighboring cities was done. Table 3-14, Comparison of Residential Development Fees, outlines the various development-related fees charged by the City in comparison to cities nearby. The City's fee structure reflects the types of developments in the City and the necessary costs associated with proper review and project mitigation.

It should be noted that different cities have different fees and requirements, and these fees are adopted at different times. Additionally, and very significantly, development impact fees adopted within the 1-2 years are significantly higher than those originally adopted in 2014 when land, construction, materials, and labor costs were a fraction of what they are today. If fees are lower in one city vs. another, it is because the City with lower fees has not had a fee update for several years while the City with higher fees has completed a recent update, rather than because the actual cost of proving facilities and infrastructure is significantly different. All cities must adhere to the requirements of AB 1600 and prepare a legally compliant nexus study in order to establish or update fees.

For example, while Millbrae has very specific inclusionary housing in-lieu fees if a developer chooses not to build affordable housing as part of a residential project, San Carlos does not appear to allow an in-lieu fee option for large developments – affordable units must be built with the project. Additionally, Foster City is in the process of updating all development impact fees, and the City of Redwood City's fees on the City website do not appear to match the development impact fee information presented in a March 7, 2022, staff report to City Council on the potential of raising park fees in the City.

It is important to note that the information presented in this section is not a true "apples to apples" comparison due to the following factors:

- **Some cities have not updated their development impact fees on their websites (some information dates back to 2014).**
- **There is a lack of information publicly available, including the most recent nexus studies.**
- **Not all cities have the same types of fees or provide the same level of clarity on how fees apply to different-sized projects. Many cities like South San Francisco, San Carlos, and San Mateo have inclusionary housing requirements and in-lieu fee options, but it is not clear how the fee amounts apply to larger developments.**
    - In the City of San Mateo, in-lieu fees are included for the 10-unit prototype project only, as information on the City's website indicates that fractional in-lieu fees are allowed for projects of 5 to 10 units. But inclusionary housing requirements are in effect for all residential projects. The cost of constructing the affordable units as part of a project larger than 10 units or for a single-family development is not reflected in Table 3-13.

However, the information below is based on information contained on the City's websites, publicly available staff reports, and publicly available nexus studies.

As presented in Table 3-14, the City's development fees appear to be similar to those in Redwood City and San Mateo, but lower than East Palo Alto. Millbrae's fees are higher than several surrounding cities for both single-family and small multifamily projects (10 units) but are significantly higher than many cities for larger multifamily developments. This is primarily due to Millbrae's impact fees being established over the last two years where similar fees in other cities have not been updated in many years. Additionally, the majority of the cities do not provide the most recent nexus study establishing development impact fees and reference fees that are anywhere from two to eight years old.

It is a well-established fact that the cost of land, labor, and materials has skyrocketed during the last 5-6 years. In fact, the most recent annual Consumer Price Index increase (2021 to 2022) in California was 7% compared to annual increases of 2% or less for the last decade. Therefore, if a nexus study establishing development impact fees was completed more than one to two years ago, the cost of providing facilities, services, and infrastructure (how the fees are calculated and determined) is significantly understated.

Although planning and development fees are tied to the costs of providing necessary public services, the costs of housing may potentially constrain the development of larger multifamily development, including affordable housing. To facilitate the development of affordable housing, the City has provided financial assistance, reduced parking requirements, and other incentives to reduce the cost of development. Additionally, the City will conduct a residential development feasibility study to ensure that development impact fees are not a constraint to housing

development, as part of Program HIP-14. The City included the following programs to ensure that development impact fees are not a constraint to housing development:

- **HIP-14.** Conduct a Residential Development Feasibility Study
- **HIP-23.** Prioritize Review and Expedite the Development of Affordable and Special Needs Projects
- **HIP-26.** Coordination with Disability Rights Service Providers and Updates to Reasonable Accommodations for People with Disabilities
- **HIP-27.** Update Density Bonus Ordinance
- **HIP-31.** Pursue State and Federal Funding for Affordable Housing
- **HIP-32.** Local Funding for Affordable Housing
- **HIP-35.** Assist with the Development of Lower-Income Housing
- **HIP-36.** Funding, Incentives, and Concessions for Extremely Low-Income Developments
- **HIP-42.** Implement Reduced Parking for Affordable Housing
- **HIP-46.** Provide Information and Examples of Incentives/Concessions for Developers
- **HIP-48.** Reduced Parking Requirements

Table 3-14. Comparison of Residential Development Fees

DEVELOPMENT FEE – CITY	ENTITLEMENT FEES	BUILDING PERMIT FEES	IMPACT FEES	TOTAL PROJECT FEES
Single-family Residential Development (per unit)				
Millbrae	$7,915	$19,050	$75,274	**$102,248**
Burlingame	$3,645	$49,500	$16,280	**$69,425**
Colma	$0	$6,760	$0	**$6,760**
Daly City	$0	$19,128	$5,074	**$24,202**
East Palo Alto	$6,342	$9,090	$206,739	**$222,171**
Foster City	$3,000	$64,886	$18,644	**$86,530**
Redwood City	$1,493	$4,952	$90,982	**$97,4272**
San Bruno	$5,000	$28,000	$25,209	**$58,209**
San Carlos	$13,604	$32,096	$38,803	**$84,503**
San Mateo	$4,979	$33,844	$50,180	**$89,003**
South San Francisco	$1,490	$24,932	$54,944	**$81,366**
Multifamily Residential Development – 100 Units				
Millbrae	$45,000	$258,950	$5,507,300	**$5,811,250**
Burlingame	$12,112	$965,000	$1,345,750	**$2,322,862**
Colma	$22,529	$480,516	$1,200,000	**$1,703,045**
Daly City	$5,555	$977,818	$243,750	**$1,227,123**
East Palo Alto	$89,105	$223,639	$26,896,500	**$27,209,244**

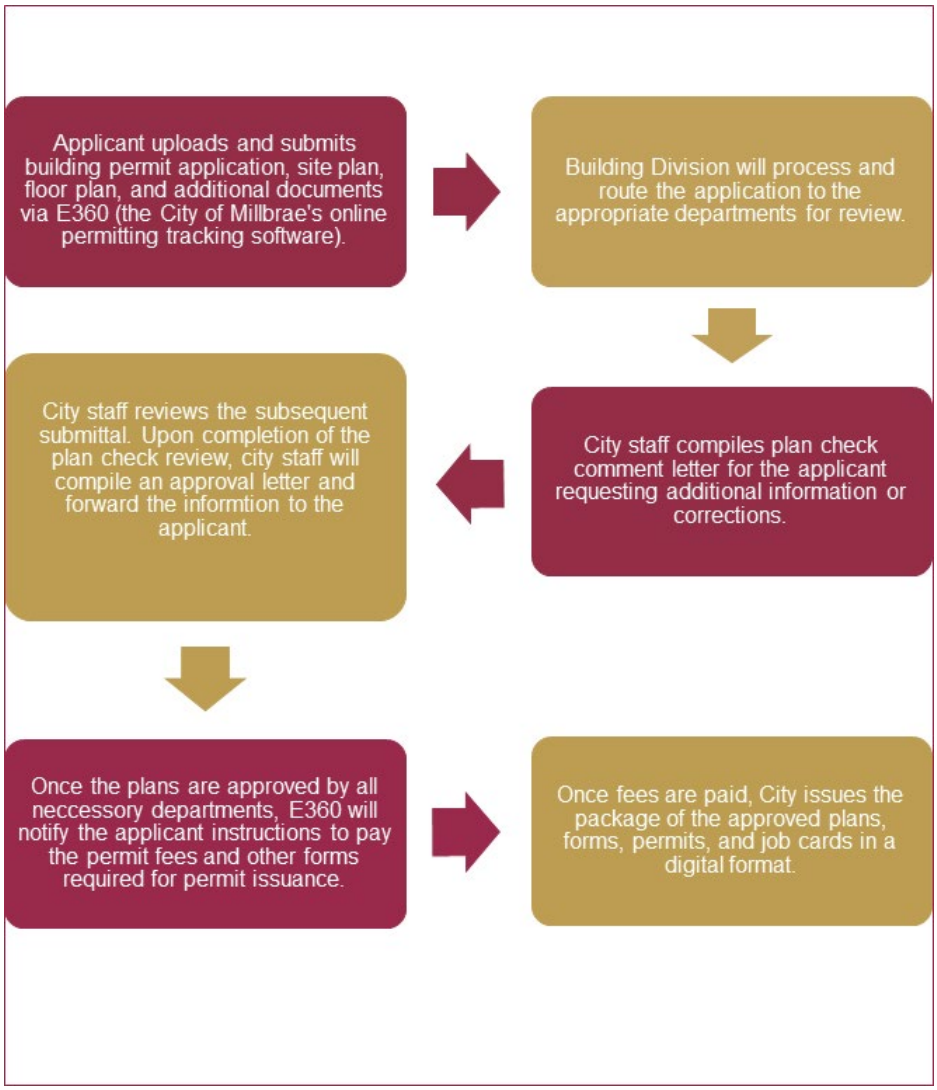
Foster City	$10,000	$1,118,823	$1,453,800	**$2,582,623**
Redwood City	$42,857	$469,623	$3,621,989	**$4,134,469**
San Bruno	$200,000	$1,426,400	$2,314,800	**$3,941,200**
San Carlos	$80,880	$509,529	$1,227,815	**$1,818,224**
San Mateo	$205,000	$611,684	$3,338,000	**$4,154,684**
South San Francisco	$20,260	$223,028	$2,996,151	**$3,239,439**
Multifamily Residential Development – 10 Units				
Millbrae	$30,000	$142,024	$550,730	**$722,754**
Burlingame	$5,431	$152,390	$145,625	**$303,446**
Colma	$15,121	$35,781	$315,000	**$365,902**
Daly City	$5,555	$269,288	$50,740	**$325,583**
East Palo Alto	$53,024	$65,205	$2,686,150	**$2,804,379**
Foster City	$5,000	$466,794	$145,380	**$617,174**
Redwood City	$22,000	$143,714	$362,199	**$527,913**
San Bruno	$60,000	$430,000	$231,480	**$721,480**
San Carlos	$48,721	$130,439	$112,206	**$291,366**
San Mateo	$50,000	$198,431	$666,734	**$915,165**
South San Francisco	$7,458	$71,979	$674,449	**$753,885**

Note: *It should also be noted the 21 Elements Survey data is comprised of the draft results obtained from the constraints survey completed by 17 jurisdictions and unincorporated San Mateo County at the end of 2021. For consistency in comparison's sake, we have elected to feature the cities that provided complete responses.*
Source: *21 Elements Constraints Survey, December 2021*

3.3.6 Processing and Permitting Procedures

Development review and permit processing are necessary steps to ensure that residential construction proceeds in an orderly manner. It ensures that development standards of the City are met, as well as those of outside agencies that have vested interests in projects. However, the time and cost of permit processing and review can be a constraint to housing development if they place an undue burden on developers.

Figure 3-9. Residential Building Permit Process



Source: *City of Millbrae 2022.*

The development community commonly cites processing times needed to obtain development permits and approvals as a prime contributor to the high cost of housing. Depending on the magnitude and complexity of each development proposal, the time that elapses from application submittal to project approval may vary considerably. Factors that can affect the length of development review on a proposed project include completeness of the development application submittal and the responsiveness of developers to staff comments and requests for information.

Certainty and consistency in permit processing procedures and reasonable processing times are important to ensure that the development review/approval process does not discourage developers or add excessive costs (including carrying costs on the property) that would make projects economically infeasible.

Table 3-15, Timelines for Entitlement Procedures, outlines the standard processing times for some of the City's typical approvals and permits. Depending on the level of environmental review required, the processing time for a project may be lengthened, as the City must completely implement CEQA processes, which can substantially add to processing times. Table 3-16, Typical Processing Procedures by Project Type, lists the typical approval requirements and estimated total processing times for various residential projects. However, coordination with other impacted parties, such as community groups and homeowner's associations, may extend the overall time frame for development. Table 3-17, Review Processes, lists the most common types of entitlements required for housing projects, the reviewing and approving, and processing times.

It is important to note that all properties identified as sites in the Sites Inventory (Chapter 7 and Appendix C) are currently zoned to allow residential development at the densities required by State law. Therefore, none of the sites would require a zone change, general plan amendment, or environmental impact report. Due to the City's efforts in adopting specific plans and updating the General Plan, major constraints to development have already been lifted, significantly streamlining the entitlement process.

Table 3-15. Timelines for Entitlement Procedures

TYPE OF APPROVAL OR PERMIT	TYPICAL PROCESSING TIME (BASED ON WORKING DAYS)
CUP	3 to 6 months
Zone Change (not needed for any site inventory sites)	12 to 15 months
Design Review	6 to 8 months
Conceptual / Precise Site Plan (Planned Developments)	6 to 9 months
Site Development Plan (MSASP) (unlikely for Site Inventory properties)	6 to 9 months
General Plan Amendment (not needed for any projects at site inventory sites that are consistent with applicable development standards)*	12 to 15 months
Environmental Impact Report (not needed for any projects in the Specific Plan area at site inventory sites, and which are consistent with Specific Plan development standards)**	15 to 18 months

** General Plan Amendments are highly unlikely in either of the specific plan areas, which are already set up to allow dense development.*
*** Environmental Impact Reports are prepared for the specific plans, which already contain the impacts of future development in their analyses.*
***Source**: 21 Elements Constraints Survey, December 2021; City of Millbrae, 2022*
***Note:** Subdivision review is included within the time frames indicated in this table.*

Table 3-16. Typical Processing Procedures by Project Type

	SINGLE-FAMILY DETACHED UNITS	ATTACHED RESIDENTIAL	PLANNED DEVELOPMENT	MSASP
Typical Discretionary Requirements	Design Review	- Design Review - Parcel/Tract Map	- Parcel/Tract Map - Conceptual Development Plan - Precise Development Plan	- Parcel/Tract Map - Site Development Plan

	SINGLE-FAMILY DETACHED UNITS	ATTACHED RESIDENTIAL	PLANNED DEVELOPMENT	MSASP
Estimated Total Processing Time	- Without General Plan Amendment or EIR: 3-8 months - With General Plan Amendment and EIR: 12-15 months	- Without General Plan Amendment: 8-12 months - With General Plan Amendment and EIR: 12-15 months	- Without General Plan Amendment: 6-9 months - With General Plan Amendment and EIR: 15-18 months	- Without General Plan Amendment: 6-9 months - With General Plan Amendment and EIR: 15-18 months

Source: *21 Elements Constraints Survey, December 2021; City of Millbrae, 2022*

Table 3-17. Review Processes

PROJECT TYPE	REVIEWING BODIES	PUBLIC HEARING REQUIRED	APPEAL BODY	ESTIMATED TOTAL PROCESSING TIME (WORKING DAYS)
Single-Family Units (Design Review, CUP)	Planning Commission	Yes	City Council	6 to 8 months
Mixed Use, Commercial (Design Review, CUP, Master Sign Program)	Planning Commission	Yes	City Council	Design Review: 12 to 14 months, CUP & Master Sign Program: 3 to 6 months
Other applications (Conditional Use Permit, Variance, Exception, General Plan Amendment, Zoning Text Amendment)	Planning Commission (for CUP, Variances, Exceptions) or Planning Commission and City Council (for General Plan Amendment, Zoning Text Amendment)	Yes	City Council	Processing time varies

Notes*: CUP = Conditional Use Permit*
Source*: City of Millbrae 2022.*

3.3.6.1 Design Review (Outside of Specific Plan Areas)

Every application for the construction, alteration, or exterior modification of a building is subject to design review in the City of Millbrae. The design review application materials are evaluated by planning staff, followed by a review, and required findings by the Millbrae Planning Commission for design review approval:

- The architectural, landscaping, and general appearance of the proposed building or structure and grounds are in keeping with the character of the neighborhood;
- The project complies with all applicable development regulations;
- The project complies with the intent of the adopted design review guidelines, including a finding that the project will not cause a significant visual impact on neighboring views from

the principal rooms of a residence unless it is proven by the applicant that there is no other viable or cost-effective alternative; and

- The proposal is not detrimental to the orderly, harmonious, and safe development of the City and will not impair the desirability of investment or occupation in the neighborhood in which the building or structure is proposed to be erected.

Not only does design review provide an opportunity to review the multifamily projects against objective development standards such as setbacks, height, parking, density, and open space; it provides an opportunity to evaluate the quality of life issues such as a resident's exposure to noise, noxious odors/fumes, other health effects and, where appropriate, social, and environmental justice issues when projects located in transitional areas of the community. In particular, neighborhood compatibility provides design direction to applicants in advance, which drives design. Nonetheless, Millbrae has an eclectic mix of building styles, as evidenced by recently built projects at Gateway at Millbrae Station (affordable housing and mixed-use development), 30 Hermosa, and Pinedera. Moreover, the approved project at Millbrae Serra Station (multi-building mixed-use development) provides a contrasting design. Therefore, **as a result of the varying design styles approved by the City, design review has not been detrimental to development projects.**

The typical processing time for design review is within 6 to 8 months. An overly lengthy design and development review and approval process may increase the cost of housing development (such as accrued interests on financing, increases in construction material and labor costs). However, the City will adopt objective design standards to expedite the development and design review processes, thus reducing overall development costs. **The City intends to utilize this new streamlined ministerial process for housing development projects to generate significant time savings for housing developments compared to the previous discretionary design review permit process, and a significant reduction in processing costs and timeframes by at least half the past timeframes.**

For a minimum of five years, all residential developments have successfully undergone the design review process without being jeopardized (a 100% success rate). Residential developments within Millbrae have consistently navigated the design review process with notable success, avoiding any compromising situations. **This sustained track record underscores a robust level of feasibility and affirms a considerable degree of certainty in the approval process**. It also contributes to instilling a sense of reliability and predictability for prospective residential projects seeking approval within Millbrae. Proposed projects have been approved at the proposed densities and have even increased their density in the process. For example, a mixed-use project at 959 El Camino Real began the design review process with a proposed 232 units and through the same process, increased the number of units to 278. This

development was approved by the Planning Commission in 2022 and has applied for building permits.

Furthermore, the pipeline developments included in the Sites Inventory of this Housing Element are continuing to move forward. For instance, a 488-unit transit-oriented mixed-use project adjacent to the Millbrae transit station has a 10-year development agreement (to 2028) with a developer option to extend the agreement an additional five years (to 2033).

However, Millbrae is proactively initiating a program aimed at establishing objective design standards. This initiative, while not borne out of any inherent issues, seeks to streamline the review timeline and amplify the existing levels of certainty in the approval procedure. This progressive step augments the existing landscape and presents the potential to further enhance the efficiency and effectiveness of the residential development framework in Millbrae. The City will implement the following program to adopt objective design standards for single-family, multi-family and mixed-use residential development:

- **Program HIP-49 Citywide Objective Residential Design Standards**

3.3.6.2 Development Review in Districts/Specific Plan Areas

The Millbrae Station Area Planned Development District was established to implement the MSASP. Regardless of the zoning district within the Specific Plan, applicants must prepare and submit a detailed site development plan, which is reviewed by staff and prepared for submission to the Planning Commission. Before submission of the development plan to the Planning Commission, an environmental review of the plan is conducted to the extent required by and in full accordance with the California Environmental Quality Act.

Because the Planning Commission is required to hold a public hearing to review the site development plan, a public hearing notice, paid for by the applicant and performed by the City, must be given in accordance with Article XXIX of the Millbrae Municipal Code.

Following the close of the public hearing, the Planning Commission approves, conditionally approves, or denies approval of the site development plan. In granting any approval, the Planning Commission is required to make the following findings:

- That the proposed development conforms to the overall intent of the Millbrae Station Area Specific Plan, and will produce an environment of stable, desirable character and produce high-quality development with uses that contribute to the visual identity and environmental quality of the station area; and
- That the proposed development complies with goals, policies, objectives, development standards, and design guidelines of the MSASP, and provides overall standards of

population densities, open space, circulation, and off-street parking and other general conditions of use at least equivalent to those required by the MSASP or by the terms of this chapter in districts where similar uses are permitted; and

- That the proposed site development plan represents a development of sufficient harmony within itself and with adjacent areas; and
- That fire protection is adequate; and
- That drainage is adequate; and
- That capacity of utilities and infrastructure, including size and location of streets and sidewalks, are adequate or will be installed/improved to an adequate level before the granting of a certificate of occupancy; and
- That recreation is adequately provided for in the area (or adequate in-lieu fees are paid).

If a site development plan is approved, approved with conditions, or disapproved by the Planning Commission, the applicant or any protestant may appeal the decision of the Planning Commission to the City Council in the manner provided in Article XXVII of the Millbrae Municipal Code.

The process for development approval for property within the Downtown and El Camino Real Specific Plan will be similar to that of the Millbrae Station Area Planned Development District; however, it will be more streamlined in that the entitlements will not require Site Development Plan findings. **Furthermore, the City will implement Program HIP-49 to adopt objective design standards for multi-family and mixed-use residential development, and as a result will expedite the development and design review processes and accelerate residential development.**

To provide a clear picture of the approval processes for the non-pipeline opportunity sites, Table 3-18, Approval Process of Opportunity Sites (Not Including Pipeline Projects), shows the existing and proposed approval process for each.

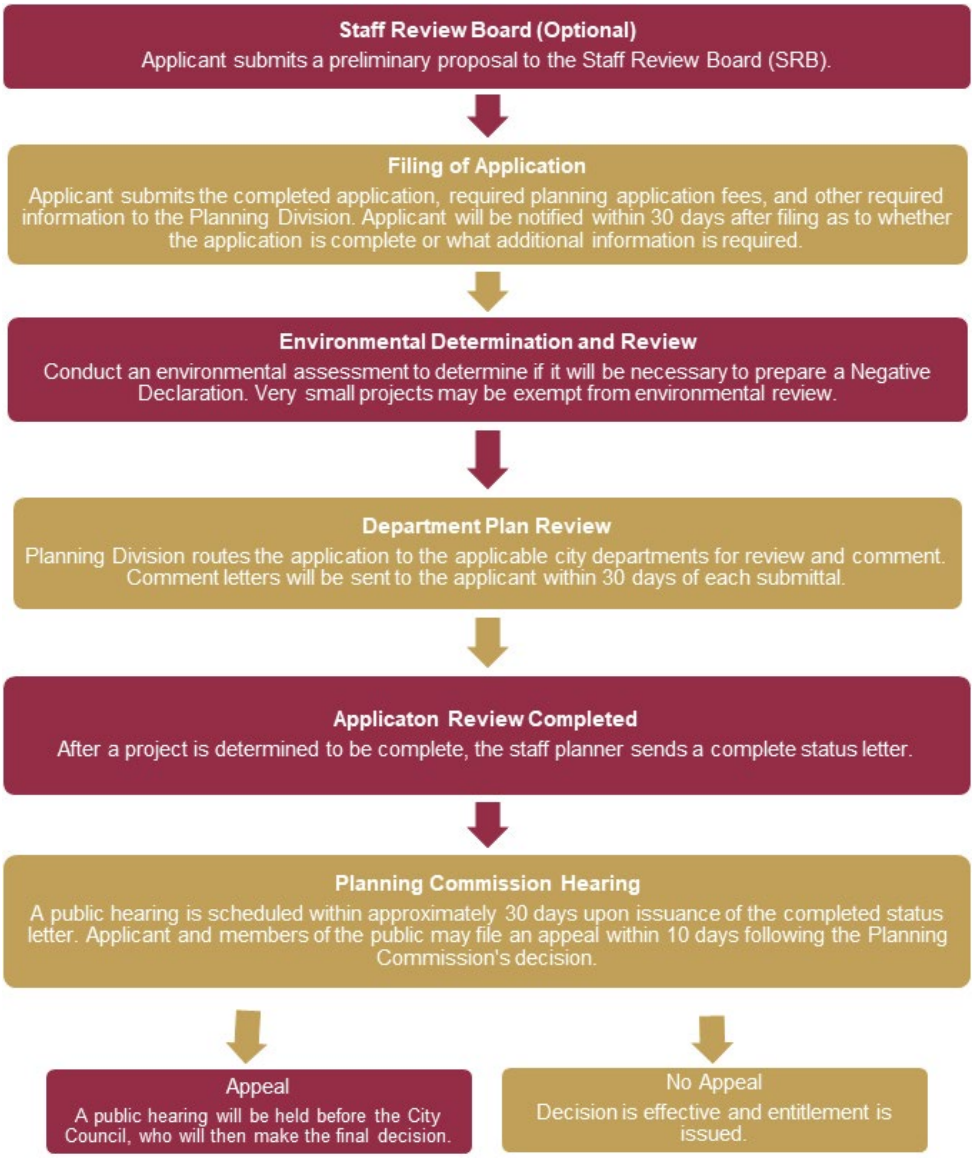
Table 3-18. Approval Process for Opportunity Sites (Not Including Pipeline Projects)

SITE NO.	EXISTING ZONING	PROCESS UNDER EXISTING ZONING	PROPOSED ZONING	PROCESS UNDER PROPOSED ZONING
1	Commercial	Design Review Approval by the Planning Commission	Residential Focused Mixed Use (DECSP)	Design Review Permit Approval by the Planning Commission
3	Commercial	Design Review Approval by the Planning Commission	Residential Focused Mixed Use (DECSP)	Design Review Permit Approval by the Planning Commission
4	Commercial	Design Review Approval by the Planning Commission	Corridor Mixed Use (DECSP)	Design Review Permit Approval by the Planning Commission

SITE NO.	EXISTING ZONING	PROCESS UNDER EXISTING ZONING	PROPOSED ZONING	PROCESS UNDER PROPOSED ZONING
5	Commercial	Design Review Approval by the Planning Commission	Corridor Mixed Use (DECSP)	Design Review Permit Approval by the Planning Commission
7	Planned Development	Conceptual and Precise Development Plan Approvals by the Planning Commission	Residential Focused Mixed Use (DECSP)	Design Review Permit Approval by the Planning Commission
9	Planned Development	Conceptual and Precise Development Plan Approvals by the Planning Commission	Residential Focused Mixed Use (DECSP)	Design Review Permit Approval by the Planning Commission
10	Planned Development	Conceptual and Precise Development Plan Approvals by the Planning Commission	Corridor Mixed Use (DECSP)	Design Review Permit by the Planning Commission
11	Planned development	Conceptual and Precise Development Plan Approvals by the Planning Commission	Corridor Mixed Use (DECSP)	Design Review Permit by the Planning Commission
13	Commercial	Design Review Approval by the Planning Commission	Corridor Mixed Use (DECSP)	Design Review Permit Approval by the Planning Commission
14	Commercial	Design Review Approval by the Planning Commission	Corridor Mixed Use (DECSP)	Design Review Permit Approval by the Planning Commission
21	Residential Mixed Use (MSASP)	Site Development Plan Approval by the Planning Commission	Residential Mixed Use (MSASP)	Design Review Permit Approval by the Planning Commission
22	Residential Mixed Use (MSASP)	Site Development Plan Approval by the Planning Commission	Residential Mixed Use (MSASP)	Design Review Permit Approval by the Planning Commission
24	Commercial	Design Review Approval by the Planning Commission	Corridor Mixed Use (DECSP)	Design Review Permit Approval by the Planning Commission

Notes: *MSASP = Millbrae Station Area Specific Plan; DECRSP = Downtown and El Camino Real Specific Plan*
Source*: City of Millbrae 2022.*

Figure 3-10. Design Review Permit Process and Timelines



Source: *City of Millbrae 2022.*

3.3.7 Conditional Use Permits

The City has an established Conditional Use Permit (CUP) process by which City staff and the Planning Commission review a proposed use and consider the potential impacts on its surroundings. Applications for a CUP may be approved, approved with conditions, or denied by the Planning Commission.

Uses that require CUP approval are identified as such in the City's land use tables (in the Zoning Code and both specific plans) and summarized below in Table 3-19, Please note that this table shows only those residential uses that require a CUP. Please see Table 3-23. Allowed Residential Uses Citywide (Outside of Specific Plan Areas)* for the complete use tables.

Table 3-19. Uses that Require Conditional Use Permits

CITYWIDE ZONING	R-2	R-3	COMMERCIAL	
Flats	-	-	C	
Triplexes	P	P	-	
Multifamily dwellings	-	p	C	
Care Facilities	C	P	P	
Boarding Houses / Rooming Houses	-	C	C	
MSASP	**TOD**	**RESIDENTIAL MIXED USE**	**EMPLOYMENT CENTER / LIGHT INDUSTRIAL**	**RESIDENTIAL OVERLAY**
Live / Work Units	P*	P*	C	-
Multifamily more than 6 units	P*	P	C	P
DECRSP	**RESIDENTIAL FOCUSED MIXED USE**	**NEIGHBORHOOD COMMERCIAL MIXED USE**	**DOWNTOWN MIXED USE**	**CORRIDOR MIXED USE**
Boarding Houses / Rooming Houses	C	C	-	-
Residential Care Facilities	C	C	-	-

Notes: (P) = Permitted; (P*) = Permitted if part of a mixed-use project; (C) = Conditional Use Permit; (-) = Not Permitted

3.3.7.1 CUP Process

Planning staff provides the applicant with an Application for Planning Action form, a project submittal requirements checklist, and other information pertaining to the Conditional Use Permit application which includes processing fees, noticing requirements, and public hearing scheduling. The applicant must submit all the required information including site plans, information regarding existing conditions, the proposed changes, and any other data in support of the request. For projects which require environmental review, additional information may be required.

Because the Planning Commission is required to hold a public hearing on each Conditional Use Permit application, a public hearing notice, paid for by the applicant and performed by the City, must be given in one or more of the following manners:

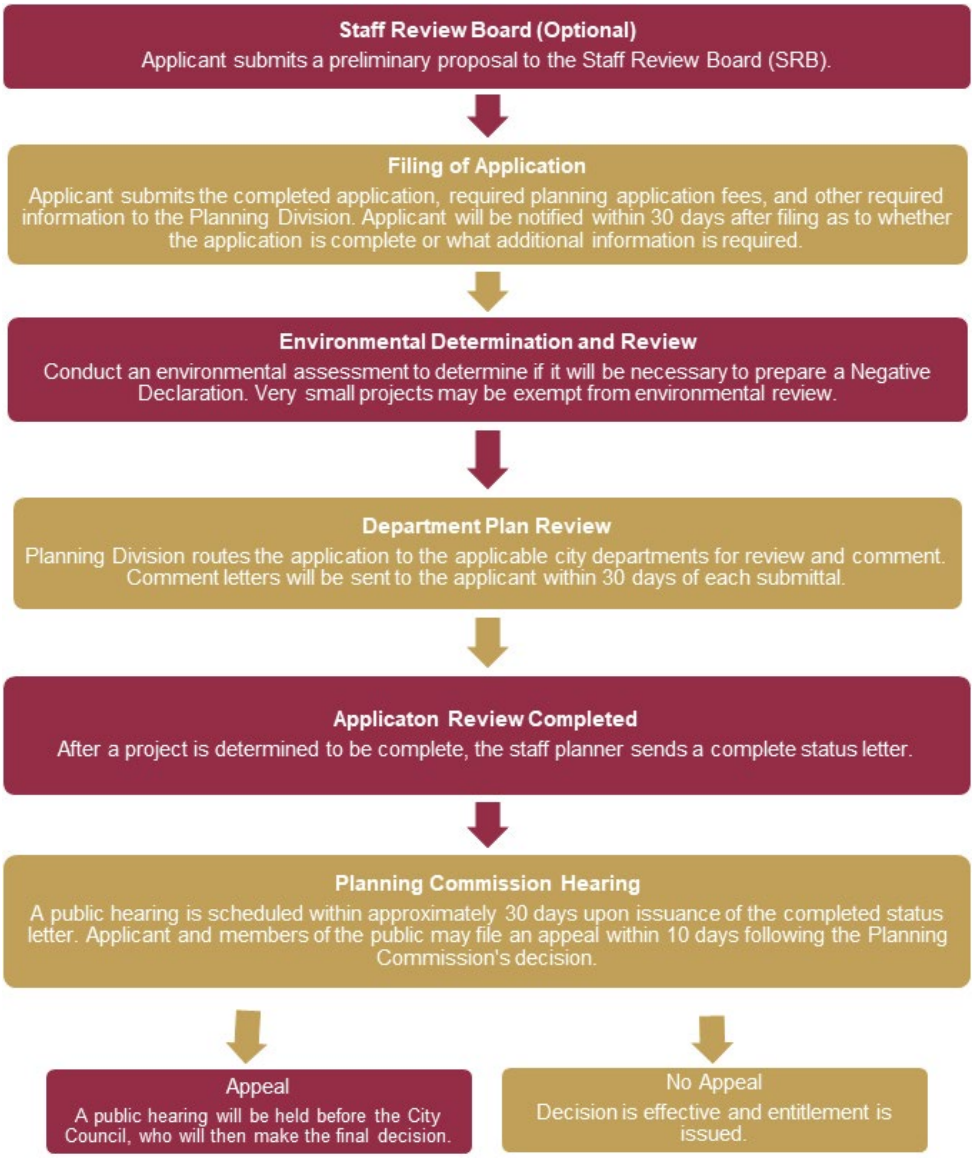
- Publication of the hearing notice in a newspaper of general circulation in the City at least once and not less than ten days before such hearing;

- Posting of the hearing notice in at least three locations not less than ten days before such hearing. The affidavit of the person who posted the notices shall establish conclusively that such posting was accomplished;
- Mailing of the hearing notice to all recorded owners of property within 300 feet of the subject property. Planning Commission hearings are generally held on the first and third Monday of each month at 7:00 p.m. in the Millbrae City Council Chambers.[2]

Public hearings begin with a Planning staff presentation on the nature of the request, the staff analysis, and staff recommendation. Then the applicant presents the proposed project and justification for the requested Conditional Use Permit. Following the applicant's presentation, the Commission hears public testimony from persons in favor of and opposed to the request. The Commission then discusses the request among themselves, with staff, and with the applicant. The Planning Commission then makes its decision on whether to approve, approve with conditions, deny, or continue the application to a subsequent public hearing. Planning Commission decisions are final but may be appealed to the City Council. Figure 3-11 shows the process and timelines for Conditional Use Permits.

[2] The Planning Commission has been meeting via Zoom during the ongoing COVID pandemic.

Figure 3-11. Conditional Use Permit Process and Timelines



In terms of timing and procedure, the CUP process is identical to and runs in conjunction with the City's design review processes, which are required for all residential development. Regardless of application type, all residential development applications are reviewed against the pertinent Zoning Ordinance, Municipal Code, Specific Plan if applicable, and General Plan sections. Applicable conditions are selected from a Standard Conditions of Approval list, and any project-specific conditions of approval are prepared, if necessary, for every application to ensure public health, safety, and welfare is maintained.

Although the timeline for processing a CUP and the associated fees can be a constraint to housing development, the City has eliminated the CUP requirement for multi-family dwellings in the new Downtown and El Camino Real Specific Plan.

The Planning Commission, under Section 10.05.2520.D of the Millbrae Municipal Code, is required to make the following findings before approving any CUP:

- The establishment, maintenance, or operation of the use applied for will not, under the circumstances of the particular case, be detrimental to the health, safety, morals, comfort, and general welfare of the persons residing or working in the neighborhood of such proposed use;
- The establishment, maintenance, or operation of the use applied for will not, under the circumstances of the particular case, be detrimental to property and improvements in the neighborhood of such proposed use.

All CUPs are subject to the following additional conditions:

- Unless otherwise specified, a Conditional Use Permit applies to the subject property, rather than to its owner or another individual, and remains with the land when conveyed to any subsequent owner(s).
- A Conditional Use Permit becomes invalid if not used within one year from the date of approval (or within any shorter period of time if so, designated by the Planning Commission or City Council).
- A Conditional Use Permit may be revoked if conditions of approval are violated.
- Conditional Use Permits do not take effect until the ten-day appeal period has ended without incident and the applicant has signed a copy of the Declaration of Acceptance of the Conditional Use Permit and all conditions thereof and returned it to the City.
- The Planning Commission may add any reasonable condition(s) it deems necessary in approving a Conditional Use Permit.

While the City of Millbrae requires housing projects to obtain other entitlements before submitting for building permits, Conditional Use Permits are generally only required for certain types of residential development or use, namely:

- Residential uses in nonresidential zones
- Rooming houses / Boardinghouses
- Residential Care Facilities

The requirement for a CUP for the development of residential uses in nonresidential zones is typical across California cities and does not necessarily pose a constraint to the development of housing, especially given the amount of residentially zoned land available. Not only does a CUP provide an opportunity to review the multifamily projects against objective development standards such as setbacks, height, parking, density, and open space; it provides an opportunity to evaluate quality of life issues such as a resident's exposure to noise, noxious odors/fumes, other health effects and, where appropriate, social and environmental justice issues when projects located in transitional areas of the community.

The requirement for a CUP for rooming houses and boardinghouses is consistent with State law and is a reasonable requirement based on the nature of the use. Boardinghouses and rooming houses are residences with a single kitchen and three or more rooms that are under separate lease agreements.

The requirement for a CUP for residential care facilities is inconsistent with State law, specifically California Health and Safety Code, Section 1500 et seq., which establishes that residential care facilities serving six or fewer people be (1) treated the same as any other residential use, (2) allowed by right in all residential zones, and (3) subject to the same development standards, fees, taxes, and permit procedures as those imposed on the same type of housing in the same zone. The City does not distinguish between the size of residential care facilities.

Consistent with State law, the City does permit State Regulated Residential Care Facilities by right in zones R-1LL, R-1, R-2, and R-3, and does not divide the use into land use categories by size. However, they are allowed in only two of the four zones in the Specific Plan and require CUPs in the other two zones. **The MSASP does not mention residential care facilities. Program HIP-45, Update the Zoning Ordinance, MSASP, and DECRSP to Comply with Residential Care Facilities Requirements, is included in Chapter 8 to address this.**

Most residential projects that go through the CUP process are completed in a 3 to 6-month timeframe. The longest time a CUP application would take would be 12 months. For example, the 278-unit mixed-use development at 959 El Camino Real was submitted on June 28, 2021, and approved by the Planning Commission on June 29, 2022.

The CUP process has not historically been a governmental constraint on the development of housing in Millbrae. It is important to note that the rate of approval for CUPs for multifamily projects has been 100% in recent years. Additionally, City staff conducted multiple stakeholder meetings with three (3) affordable housing developers and four (4) market-rate developers, and the CUP requirement was not identified by any developer as a constraint to housing development. Conditions of approval are standard and placed on all market-rate and affordable housing projects throughout the City. **Furthermore, the City will implement Program HIP-49**

to adopt objective design standards for multi-family and mixed-use residential development, and as a result will expedite the development and design review processes and accelerate residential development.

3.3.8 Inclusionary Zoning Ordinance

In July 2021, the City Council adopted and added Affordable Housing On-Site and In-Lieu Fee Requirements (Ordinance 787) to the City's Municipal Code. The City maintains an updated web page that contains a list of affordable housing resources that are provided by the County of San Mateo as well as newly available affordable housing in the City:

- https://www.ci.millbrae.ca.us/departments-services/community-development/redevelopment/affordable-housing.

3.3.8.1 Requirements

Under Ordinance 787, new development projects are required to include deed-restricted affordable housing for very low-, low-, and moderate-income households in compliance with the minimums outlined in the Affordable Housing Requirements and Program Regulations (Resolution No. 21-49). Under these provisions, all residential projects which include ten or more units are required to provide a minimum of 15% of the total number of units as follows:

- **Ownership Units.** Fifteen percent (15%) of the total number of units in the residential development project must be set aside for occupancy and be affordable to moderate-income households.
- **Rental Units.** Fifteen percent (15%) of the total units in the residential development project must be set aside for occupancy and be affordable to Very Low (10%) and Low-income (5%) households.

Table 3-20. Inclusionary Zoning

INCOME CATEGORY	OWNERSHIP UNITS	RENTAL UNITS
Very Low-income	-	10%
Low-income	-	5%
Moderate-income	15%	-
Total	15%	15%

***Source*:** City of Millbrae

In determining the required number of inclusionary units, any decimal fraction of half a unit or more is rounded up to the nearest whole number and may be satisfied by payment of an in-lieu fee (see below) or by the construction of an additional unit. **The developer of rental units may alternatively request the option to satisfy the affordable housing requirement through the donation of land or through the construction of off-site units.**

It is important to note that inclusionary units that are provided in satisfaction with these requirements may be counted toward the number of affordable units required to qualify for a density bonus.

3.3.8.2 Affordable Housing In-Lieu Fees

Concurrently with the adoption of Ordinance No. 787 and Resolution 21-49, the City Council also approved Resolution No. 21-50 to establish affordable housing in-lieu fees to provide developers flexibility in meeting the City's inclusionary housing requirement. **A developer may include the required affordable units as part of a residential project or can pay an in-lieu fee instead.** The fees were established based on a nexus study that was completed in May 2021 which analyzed the linkage between the development of new market-rate residential units and the need/demand for additional affordable housing.

It is important to note that affordable housing in-lieu fees may only satisfy the inclusionary housing requirement in the following situations:

- For residential development projects consisting of 4 to 9 units.
- When the calculation of the inclusionary units in development projects of 10 or more units results in a fractional unit less than 0.5.

The fees listed in Table 3-21 are required to be paid by developers of projects of 4 to 9 units.

Table 3-21. In-Lieu Fees for Residential Development Projects with 4 to 9 Units

PROJECT TYPE AND SIZE	IN-LIEU FEE
Rental Projects	
4 Unit Project	$216,990.60
5 Unit Project	$271,238.25
6 Unit Project	$325,485.90
7 Unit Project	$379,733.55
8 Unit Project	$433,981.20
9 Unit Project	$488,228.85
Ownership Projects	
4 Unit Project	$171,164.27

PROJECT TYPE AND SIZE	IN-LIEU FEE
5 Unit Project	$213,955.34
6 Unit Project	$256,746.41
7 Unit Project	$299,537.48
8 Unit Project	$342,328.55
9 Unit Project	$385,119.62

***Source**: City of Millbrae*

For projects of 10 or more units, instead of providing an additional unit when less than 0.5 of a unit is required, developers may satisfy the requirement for that fractional unit via an in-lieu fee. The required fee varies by the required affordability level of the fractional unit not constructed and on the fraction itself:

Table 3-22. In-Lieu Fees for Residential Development Projects with 10 or More Units

FRACTIONAL UNIT REQUIREMENT	AFFORDABILITY GAP	IN-LIEU FEE
Very Low-Income		
0.05 Unit	$376,440	$18,822
0.10 Unit	$376,440	$37,644
0.15 Unit	$376,440	$56,466
0.20 Unit	$376,440	$75,288
0.25 Unit	$376,440	$94,110
0.30 Unit	$376,440	$112,932
0.35 Unit	$376,440	$131,754
0.40 Unit	$376,440	$150,576
0.45 Unit	$376,440	$169,398
Low-Income		
0.05 Unit	$332,073	$16,604
0.10 Unit	$332,073	$33,207
0.15 Unit	$332,073	$49,811
0.20 Unit	$332,073	$66,415
0.25 Unit	$332,073	$83,018
0.30 Unit	$332,073	$99,622
0.35 Unit	$332,073	$116,226
0.40 Unit	$332,073	$132,829
0.45 Unit	$332,073	$149,433
Moderate-Income		
0.05 Unit	$285,274	$14,264
0.10 Unit	$285,274	$28,527
0.15 Unit	$285,274	$42,791
0.20 Unit	$285,274	$57,055
0.25 Unit	$285,274	$71,318

FRACTIONAL UNIT REQUIREMENT	AFFORDABILITY GAP	IN-LIEU FEE
0.30 Unit	$285,274	$85,582
0.35 Unit	$285,274	$99,846
0.40 Unit	$285,274	$114,110
0.45 Unit	$285,274	$128,373

***Source**: City of Millbrae*

Satisfying the inclusionary housing requirement can account for higher total development costs, and potentially provide a constraint to rental and multifamily market level housing development. As shown in Table 3-21. In-Lieu Fees for Residential Development Projects with 4 to 9 Units, the total in-lieu fees for residential projects with 4 to 9 units were much higher for rental ($54,247 per unit) than for ownership ($42,791 per unit). As shown in Table 3-22. In-Lieu Fees for Residential Development Projects with 10 or More Units, the total in-lieu fees for residential projects with 10 or more units was higher for units with a deeper affordability, specifically $376,440 per unit for very low-income, $332,080 per unit for low-income, and $285,273 per unit for moderate-income. However, the City prepared an Affordable Housing In-Lieu Fee Nexus Study to provide an in-depth analysis of the feasibility of inclusionary housing in the City. Section 4 of the nexus study concluded that the inclusionary housing fees are feasible and do not affect the development of housing. The study could be found online at:

https://www.ci.millbrae.ca.us/DocumentCenter/View/528/Nexus-Study-PDF Although the Inclusionary Housing Ordinance was implemented within the last two years, there is no data to determine the impacts of housing supply within Millbrae. The City projects 307 total number of affordable housing units could be built as a result of the Inclusionary Housing Ordinance. This projection is based off requirements of the Inclusionary Housing Ordinance and the City's total housing capacity not including the units from pipeline projects and proposed ADU's, as shown in Table 7-10. Site Summary (All Sites) of Chapter 7 Sites Inventory. The funds from the City's in-lieu fee does not contribute to first-time homebuyer's loan programs or similar initiatives, therefore these requirements will increase the supply of affordable housing to a broad range of households with varying income levels within the City.

Because prices and rents have also grown substantially with the costs of developing affordable housing, these prices and rents are typically high enough to absorb the additional costs resulting from the inclusionary requirement. As described in the sections above, the City offers a range of options and incentives to ensure the inclusionary housing policy does not unduly constrain housing development in the City. **Instead of building the affordable units on-site, developers have the option to fulfill inclusionary requirements through the following:**

- **the donation of land**
- **construction of off-site units**

In addition to the options provided, developers can count the affordable units built to fulfill the Inclusionary Housing Ordinance requirements towards the number of units required to take advantage of the State's density bonus laws, as described in Section 3.3.3.2 Density Bonus of this Chapter.

The inclusionary housing requirement and related fees are intended to provide affordable housing choices in the community that the private market, acting alone, will not build. Density bonuses help provide affordable units, but at numbers that fall below the RHNA requirements. However, these additional requirements do add costs to residential development and could be considered a constraint to housing development. To ensure that residential development is financially feasible in Millbrae, the following program is proposed in the Housing Plan:

- **Program HIP-14, Conduct a Residential Development Feasibility Study** provides that the City will prepare a financial feasibility analysis for residential development following the Housing Element certification and update the analysis every two (2) years.
- **HIP- 50. Inclusionary Housing Impact Fee Study** provides that the City will prepare an affordable housing nexus study to examine the feasibility and economic impact of increasing the City's affordable housing requirement for multi-family residential projects from 15% to 20%.

3.3.9 Codes and Enforcement and On-/Off-Site Improvement Standards

3.3.9.1 Codes and Enforcement

In 2001, the State of California consolidated its building codes into the California Building Standards Code, which is contained in Title 24 of the California Code of Regulations. The City most recently adopted the 2019 California Building Code; Green Building Standards Code; and Electrical, Mechanical, Plumbing, Fire, Energy, Historical, and Uniform Housing Codes.

Code Enforcement investigates any type of complaint regarding property, parked vehicles, and trees, and enforces a variety of codes, including the following:

- California Building Codes.
- Zoning Ordinance.
- Municipal Codes.
- Uniform Fire Code, Uniform Housing Code, and Building Code, including Americans with Disabilities Act (ADA) accessibility requirements.

Code Enforcement responds to complaints concerning all types of properties in the City. However, complaints related to housing in Millbrae typically involve the following:

- Hoarders.
- Short-term rentals.
- Signage.
- Life/safety issues.
- Property maintenance issues.
- Drainage.
- Illegal home occupation.
- Construction without permits.
- Inoperative vehicles.
- Noise.
- Water quality violations involving paint spills, oil spills, raw sewage, washing debris into gutters, draining pools into gutters, and storm drains.

Code Enforcement staff responds to approximately 50 new residential complaints and participates in 65 active investigations each month. Enforcement procedures emphasize voluntary compliance. On average, Code Enforcement administers the following:

- 300 courtesy notices, verbal warnings, and notices of violation per year.
- 70 administrative citations per year.
- 40 direct abatements (including graffiti – tag & litter removals)

3.3.9.2 On-/Off-Site Improvement Standards

The City requires developers of large projects to provide public improvements to promote and protect the health and safety of all residents. Required public improvements are most frequently provided through approvals of land subdivisions. The most significant improvements required involve City streets and park space.

Streets

The 2009 Mobility & Circulation Element intends in part to ensure the uniform design and provide

guidance to those preparing improvement plans for the City. The Element contains several policies which ensure that development projects do not adversely impact surrounding transportation infrastructure and traffic flow. Depending on the project size and scope, developers may be required to perform site-specific transportation studies to identify and implement transportation-related improvements (and/or a fair share contribution via the payment of the applicable required development impact fees for transportation and mobility) to maintain an acceptable level of service standards and VMT thresholds. While this financial burden may be seen as a constraint to the production of housing, the City allows developers of projects which are forecasted to cause unacceptable levels of traffic congestion to instead incorporate TDM measures and/or vehicle trip reduction measures that promote non-vehicular transportation. An updated Mobility & Circulation Element is included in the 2040 General Plan and is in public review form as of this writing. The updated Element retains the core policies of requiring developers to conduct transportation studies and contribute their fair share of off-site transportation improvements.

Parks

As a condition of tentative map approval, the City requires a developer to dedicate land, make improvements, and/or pay fees to develop new parks or recreational facilities. Improvements include site grading, automatic irrigation systems, adequate drainage, lawn, shrubs, trees, concrete walkways, and walkway lighting.

Chapter 10.20 of the Municipal Code (Parks and Recreation Land) specifies that where a park or recreational facility has been designated in the General Plan and is to be located in whole or in part within the proposed subdivision to serve the immediate and future needs of the residents of the subdivision, the subdivider must dedicate land for a local park at a rate of 2 acres per 100 dwelling units.

In cases where there is no such designation in the General Plan, then the developer is required to pay a fee equal to the value of the land prescribed for dedication.

3.3.10 Constraints on Housing for People with Disabilities

State law requires that each local jurisdiction assess its local governmental constraints relating to the construction and improvement of housing for people with disabilities.

3.3.10.1 Zoning and Land Use Policies and Practices

The City has a total of 13 licensed residential care facilities, including the following:

- Golden Age, Inc.
- Heritage Royale

- Magnolia of Millbrae
- Cadence Millbrae
- Millbrae Manor (Millbrae Care Center)
- Millbrae Assisted Living
- Millbrae Family Care Home
- Hearts at Millwood Assisted Living
- Advent Residential Home 2
- Elle's Care Home 2
- J and V Family Care Home
- Millbrae Board & Care Home
- Millbrae Paradise Retirement Home

Currently, housing facilities for people with disabilities are regulated in the Zoning Ordinance under State Regulated Residential Care Facilities. The requirements of the California Health and Safety Code, Section 1520.5, are enforced by the California Department of Social Services, Health, and Human Services Agency. The law requires that residential facilities be separated by a minimum of 300 feet to avoid over-concentration. Although the City complies with state spacing and concentration requirements for housing for persons with disabilities, the Zoning Ordinance does not specify such requirements. To ensure this information is included, the City included **Program HIP-45. Update the Zoning Ordinance, MSASP, and DECRSP to Comply with Residential Care Facilities Requirements**.

Residential care facilities often provide care to people with disabilities, including those with physical and mental disabilities. California law states that people who require supervised care are entitled to live in normal residential settings and preempts cities from imposing many regulations on residential care facilities. California Health and Safety Code, Section 1500 et seq., establishes that residential care facilities serving six or fewer people be (1) treated the same as any other residential use, (2) allowed by right in all residential zones, and (3) subject to the same development standards, fees, taxes, and permit procedures as those imposed on the same type of housing in the same zone. Currently, the Zoning Ordinance does not demonstrate its compliance with state law regarding residential care facilities. For instance, **the Zoning Ordinance does not specify requirements for residential care facilities of any size** or specify whether non-state-regulated facilities are subject to the same requirements as those with

a license. To address this, the City included **Program HIP-45. Update the Zoning Ordinance, MSASP, and DECRSP to Comply with Residential Care Facilities Requirements.**

Consistent with State law, **the City permits State Regulated Residential Care Facilities by right in zones R-1LL, R-1, R-2, and R-3, and does not divide the use into land use categories by size.** However, they are allowed in only two of the four zones in the Downtown and El Camino Real Specific Plan and require CUPs in R-2 and C zones. The MSASP, on the other hand, does not mention residential care facilities. The requirement of CUPs for residential care facilities is inconsistent with state law. The City will update the Zoning Ordinance, as described in Program HIP-45, to allow licensed and state-regulated residential care facilities in all residential, low-density zones and will be regulating these uses based on number of occupants.

To comply with the Health and Safety Code's exemptions for group homes of any number of total occupants, the City must allow group homes that operate as single-family residences, and that do not provide licensable services to be allowed in single-family neighborhoods, subject only to the generally applicable, nondiscriminatory health, safety, and zoning laws that apply to all single-family residences. As such, the City's Zoning Ordinance relies on building and fire code occupancy standards when regulating uses based on the number of occupants. Because these homes are not providing licensable services, they should be treated the same as other residences. The City does not regulate groups homes of 7 or more occupants and that do not provide licensable services. The City will implement Program HIP-45 to address zoning for group homes that do not provide licensable services and allow these uses in any zone that permits residential uses and only subject to those restrictions that apply to similar residential uses.

To ensure the City is compliant with state requirements, this Housing Element includes the following program:

- **Program HIP-45, Update the Zoning Ordinance, MSASP, and DECRSP to Comply With Residential Care Facilities Requirements.** This program shall update land use tables in the MSASP and the Downtown and El Camino Real Specific Plan to allow residential care facilities by right under California Health and Safety Code, Section 1500 et seq. In addition, the City will update the Zoning Ordinance to allow group homes in any zone that permits residential uses and only subject to those restrictions that apply to similar residential uses.

3.3.10.2 Reasonable Accommodations

Section 10.05.0420 of the Zoning Ordinance allows the City Manager to grant limited exceptions to development standards for minor improvements to existing residences to accommodate access needs for disabled persons. The City Council adopted Ordinance 748 in January 2015,

which establishes specific written procedures for requesting and granting reasonable accommodation for housing for persons with disabilities, and procedures for City approval. As part of these procedures, the City Manager must make the following findings:

- The proposed improvements are necessary to provide housing access for disabled persons.
- The proposed exception(s) will cause no significant negative environmental impacts to the applicant's property, adjacent properties, or the surrounding neighborhood and community.
- The proposed exception(s) will cause no significant negative impacts on the privacy of the applicant or adjacent neighbors.

Requests for reasonable accommodations are reviewed by the Building and Planning Divisions through an online building permit process to increase access for applicants. It is important to note that reasonable accommodations are specifically to deviate from development standards. If the project complies with the existing development standards, the above findings do not need to be made. However, the City's reasonable accommodation procedures and approval findings may pose constraints to housing for persons with disabilities by increasing approval times and costs. As such, the City will amend the Zoning Ordinance to allow reasonable accommodation through a non-discretionary review process for persons with disabilities seeking equal access to housing under the Federal Fair Housing Act and the California Fair Employment and Housing Act. The City will investigate and adopt specific procedures and thresholds for reasonable accommodation requests, which may include and are not limited to the following approval findings:

- The housing which is the subject of the request for reasonable accommodation will be used for an individual protected under the Fair Housing Act.
- The request for reasonable accommodation is necessary to make specific housing available to an individual protected under the Fair Housing Act.
- The requested reasonable accommodation does not impose an undue financial or administrative burden on the City and does not fundamentally alter City zoning, development standards, policies, or procedures.

To ensure that access to reasonable accommodations does not pose a housing constraint, the City is proposing the following program to amend the reasonable accommodations ordinance and remove constraints, namely approval findings related to privacy, adjacent neighbors, and impacts on surrounding neighborhoods/uses:

- **Program HIP-26: Coordination with Disability Rights Service Providers and Updates to Reasonable Accommodations Ordinance for People with Disabilities**

3.3.10.3 Definition of Family

Some local governments may illegally attempt to restrict access to housing for households failing to qualify as a "family" by the definition specified in the local government's municipal code. Specifically, a restrictive definition of "family" that limits the number of and differentiates between related and unrelated individuals living together may illegally limit the development and siting of group homes for people with disabilities, but not for housing families that are similarly sized or situated. The City's Zoning Ordinance (Section 10.05.0200, Definitions) explicitly includes residents of residential care facilities and group homes for people with disabilities in its definition of "family":

> *"Family" means any individual or group of two or more individuals occupying a dwelling unit where all residents share living expenses, chores, and other household responsibilities, and/or form social, economic, and psychological commitments to each other. A family includes the residents of residential care facilities and group homes for people with disabilities. A family does not include institutional group living situations such as dormitories, fraternities, sororities, monasteries, convents, military barracks, or commercial care facilities such as retirement centers, nursing homes, and the like, or commercial group living arrangements such as boardinghouses, rooming houses, and the like.*

The City's definition of family is not used to limit the use or operations of group homes and is consistent with fair housing law, as it does not limit the number of members in a family and does not require members to be related by blood.

3.3.10.4 Building Codes

Building procedures within the City are also required to conform to the California Building Code, as adopted in the City's Municipal Code. Standards within the Building Code include provisions to ensure accessibility for people with disabilities. These standards are consistent with the ADA and Title 24. No local amendments that would constrain accessibility or increase the cost of housing for people with disabilities have been adopted.

3.4 Zoning for a Variety of Housing Types

Housing Element law specifies that jurisdictions must identify adequate sites to be made available through appropriate zoning and development standards to encourage the development of a variety of housing types for all economic segments of the population. The City's residential, mixed-use, and commercial zones allow for a variety of housing types. Tables 3-21, 3-22, and

3-23 summarize the housing types permitted in the City within zoning categories that permit residential development Citywide, for the MSASP, and for the DECRSP, respectively.

As shown in Table 3-24, Allowed Residential Uses in the Millbrae Station Area Specific Plan, and Table 3-25, Allowed Residential Uses in the Draft Downtown and ECR Specific Plan, 100% multifamily residential development is only allowed in TOD zones and the DECRSP area as a part of a mixed-use development. However, applicants typically request a density bonus waiver of this standard and all projects easily meet the mixed-use requirement. As such, this is not a constraint to development.

Table 3-23. Allowed Residential Uses Citywide (Outside of Specific Plan Areas)*

HOUSING TYPE	R-1LL	R-1	R-2	R-3	C
Single-Family Dwellings	P	P	P	P	-
Flats	-	-	-	-	C
Duplexes	-	-	P	P	-
Triplexes	-	-	P	P	-
Multiple-Family Dwellings	-	-	-	P	C
Care Facilities	-	-	C	P	P
Rooming & Boarding Houses	-	-	-	C	C
State-Regulated Residential Care Facilities	P	P	P	P	-
Emergency, Transitional, & Supportive Housing	-	-	-	P	-
Accessory Dwelling Units	PP	PP	PP	PP	PP
Junior Accessory Dwelling Units	PP	PP	PP	-	-

Table 3-24. Allowed Residential Uses in the Millbrae Station Area Specific Plan

HOUSING TYPE	TOD	RESIDENTIAL MIXED-USE	EMPLOYMENT CENTER / LIGHT INDUSTRIAL	RESIDENTIAL OVERLAY
Duplexes	-	-	-	P
Live/Work Units	P*	P*	C	-
Multifamily up to 6 units	-	-	-	P
Multifamily with more than 6 units	P*	P	C	P

Notes: *(P) = Permitted; (P*) = Permitted if part of a mixed-use project; (C) = Conditional Use Permit; (-) = Not Permitted*

Table 3-25. Allowed Residential Uses in the Downtown and ECR Specific Plan

HOUSING TYPE	RESIDENTIAL FOCUSED MIXED-USE	NEIGHBORHOOD COMMERCIAL MIXED-USE	DOWNTOWN MIXED-USE	CORRIDOR MIXED-USE
Flats	P*	P*	-	-
Duplexes	-	-	-	-
Triplexes	P	P	-	-
Multifamily	P*	P*	P*	P*
Live/Work	P	P	P*	P*
ADUs/JADUs	P	P	P	P
Boardinghouse / Rooming house	C	C	-	-
Residential Care Facilities	C	C	-	-

Notes: *(P) = Permitted; (P*) = Permitted if part of a mixed-use project; (C) = Conditional Use Permit; (-) = Not Permitted*

3.4.1 Single-Family Housing

Single-family residences are allowed by right in the following zones: Single-family large lot (R1-LL), Single-family Residential (R-1), Duplex/Triplex Residential (R-2), and Multifamily Residential (R-3).

3.4.2 Multifamily Housing

Duplexes are allowed by right in the Residential overlay of the MSASP. Duplexes and triplexes are allowed by right in the Duplex/Triplex Residential zone (R-2) and Multifamily Residential zone (R-3).

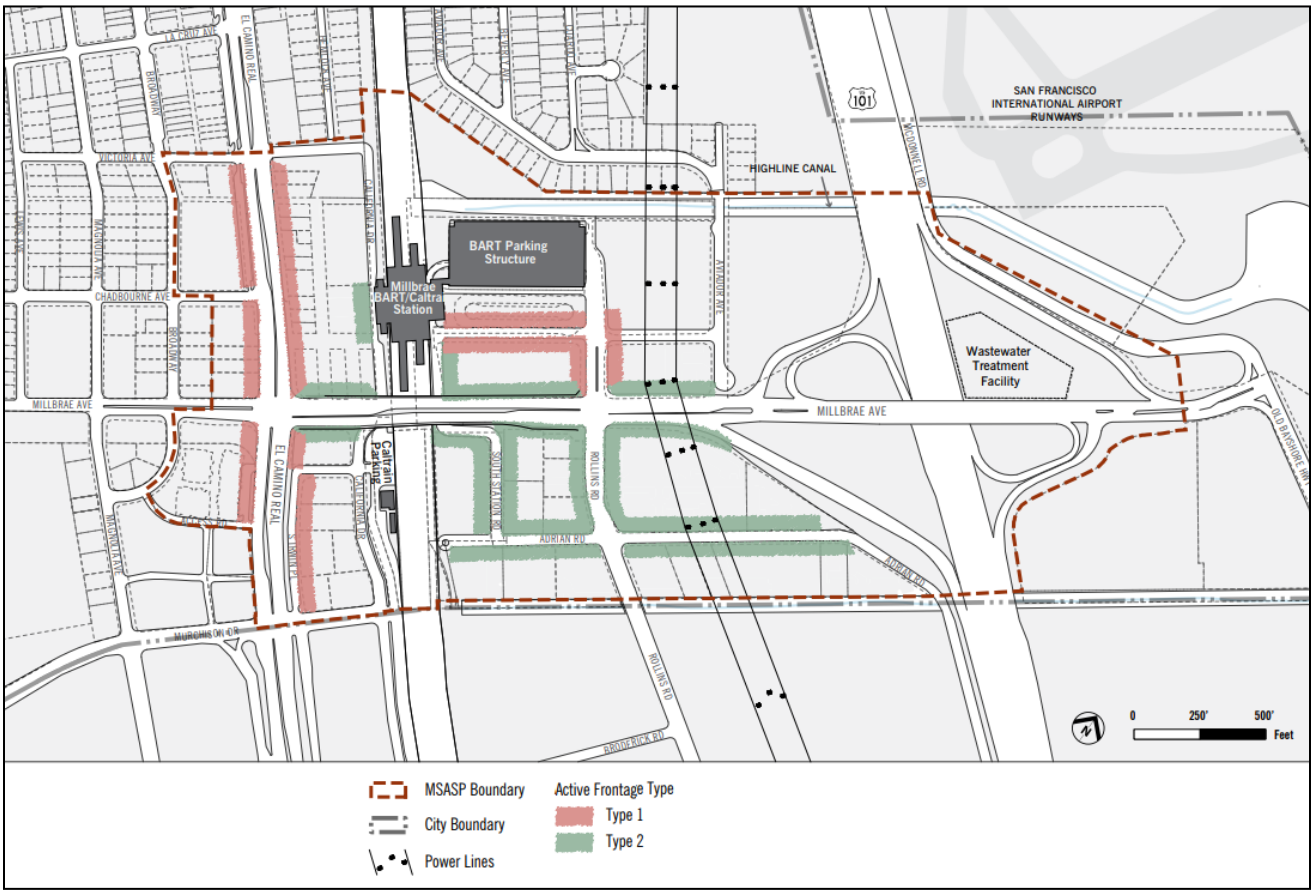
Flats above commercial uses are allowed with a CUP in the Commercial zone (C), along secondary frontages in the Downtown Improvement Area zone (which is to be replaced by the Downtown and El Camino Real Specific Plan), and in the Employment/Light Industrial Center zone of the MSASP. Flats above commercial uses are allowed by right in the TOD zone of the MSASP.

Single-use multifamily developments are permitted by right in the Multifamily residential zone (R-3), in the Residential Mixed-Use zone of the MSASP, and the Residential Overlay zone of the MSASP. Single-use multifamily developments are allowed with a CUP in the Commercial zone (C) and in the Employment/Light Industrial Center zone of the MSASP.

It is significant that multifamily development in the City's specific plan areas – where the majority of the Site Inventory sites are located – require residential projects to be mixed-use in the zones that allow the most residential density. Specifically, this requirement applies to the TOD (transit-oriented development) zone of the MSASP, and all mixed-use zones of the DECRSP.

Figure 3-12 indicates a requirement for nonresidential ground floor uses in areas outside of the TOD zone as well. On frontages that are indicated as Type 1 in Figure 3-12, a minimum of 65% of the length of the building must consist of active ground floor uses, which may include retail, restaurant, services, lobby entries, live/work, and community gathering spaces.

Figure 3-12. Required Commercial Ground Floors in the MSASP



3.4.3 Manufactured Housing, Mobile Homes, and Mobile Home Parks

The City's Zoning Ordinance does not define "Manufactured Housing," "Mobile Home," or "Mobile Home Parks." However, it does include manufactured housing in its definition of "Development":

> *"Development" or "development project" means any project within the city that requires a building permit. The term "development" or "development project" also includes projects for the erection of manufactured housing or structures, and structures moved into the city which require city permits.*

While the definition of "development" acknowledges manufactured housing as a development, **the Zoning Ordinance does not specify if manufactured housing is processed with similar requirements to Single-Family Residential**, as required by California Government Code Section 65852.3. **Program HIP-44. Update the City's Zoning Ordinance is included in Chapter 8 – Housing Plan and will bring the City to comply with current law.**

3.4.4 Farmworker and Employee Housing

Under the California Employee Housing Act (Section 17000 of the California Health and Safety Code), specifically Section 17021.5, any employee housing providing accommodations for six or fewer employees shall be deemed a single-family structure within a residential land use designation. Employee housing for six or fewer people must be permitted wherever a single-family residence is permitted. To comply with State law, no conditional use permit or variance can be required.

Additionally, in accordance with California Health and Safety Code, Section 17021.6, any employee housing consisting of no more than 36 beds in group quarters, or 12 units or spaces designed for use by a single-family or household, or that is approved pursuant to California Health and Safety Code, Section 17021.8, shall be deemed an agricultural land use. Except as provided in Section 17021.8, housing is an activity that differs in any other way from an agricultural use. No CUP, zoning variance, or other discretionary zoning clearance shall be required of this employee housing that is not required of any other agricultural activity in the same zone. The permitted occupancy in employee housing in a zone allowing agricultural uses shall include agricultural employees who do not work on the property where the employee housing is located.

The City will continue to comply with the requirements of State law (as described above), the Housing Plan contains **Program HIP-44, Update the City's Zoning Ordinance, and Program HIP-30, Employee Housing.** Both programs help the City comply with State requirements.

In addition to the above provisions, zoning is available for housing for farmworkers through the variety of other housing types encouraged in the Zoning Code, including multifamily, SRO, and ADUs.

3.4.5 Single-Room Occupancy

Single-Room Occupancy units (SROs) are secure residential units that include communal or individual kitchens and communal or individual bathroom facilities. **The Millbrae Zoning Ordinance classifies SROs under the definition of "Boardinghouse/Roominghouse" and allows them conditionally in the Multifamily Residential, Commercial, Residential Focused Mixed-Use, and Neighborhood Commercial Mixed-Use zones.**

Furthermore, a Conditional Use Permit would need to be approved by the Planning Commission at a public hearing before the applicant can proceed to obtain their building permits – a process that, although necessary, could extend the approval time. **In order to mitigate any constraints caused by the requirement of a CUP, this Housing Element includes Program HIP-23, Prioritize Review and Expedite Development of Affordable and Special Needs Projects.**

3.4.6 Emergency, Transitional and Supportive Housing

Millbrae allows emergency, transitional, and supportive housing in various areas of the City with the requirements summarized in Table 3-26 below.

Table 3-26. Constraints Related to Emergency Shelters, Transitional & Supportive Housing, and Low-Barrier Navigation Centers

	EMERGENCY SHELTERS	TRANSITIONAL & SUPPORTIVE HOUSING	LOW-BARRIER NAVIGATION CENTERS
Allowed Zones	Downtown and El Camino Real Specific Plan area, Commercial zones, and Industrial zones.		General Plan, Zoning Code, & Specific Plans are silent.
Parking Requirement	- 0.35 spaces per bed (rounded up to the nearest space), plus one space per employee that is working at the same time as another employee.	NA	NA
Additional Requirements	- No emergency shelter shall be located closer than 300 feet to another emergency shelter. - No emergency shelter shall contain more than ten beds.	NA	NA

The following sections expand on the requirements and compliance for emergency, transitional, and supportive housing.

3.4.6.1 Emergency Shelters

Senate Bill 2, enacted in October 2007, requires local governments to identify one or more zoning categories that allow emergency shelters (year-round shelters for people experiencing homelessness) without discretionary review. The statute permits the City to apply limited conditions to the approval of ministerial permits for emergency shelters. For instance, off-street parking requirements cannot exceed what is required for residential and commercial uses in the same zone. Also, per Senate Bill 2, the identified zone(s) must have sufficient capacity to accommodate at least one year-round shelter and accommodate the City's share of the regional unsheltered homeless population.

According to the 2022 point-in-time count, 1,092 people experiencing unsheltered homelessness were living in San Mateo County, of which **nine are in Millbrae**. The City defines emergency shelters as "housing with minimal support services for homeless persons that is limited to occupancy of six months or less by a homeless person."

Emergency shelters are permitted by-right and without discretionary action throughout the Downtown and El Camino Real Specific Plan area, commercial zones, and industrial zones. The land use requirements listed below are imposed by the City on emergency shelters (all from Section 10.05.1030 of the Municipal Code):

- Proximity to Other Shelters. No emergency shelter shall be located closer than 300 feet to another emergency shelter.
- Parking. A ratio of 0.35 off-street parking spaces for each bed is required, rounded up to the nearest whole parking space; plus, one parking space for each employee who is working at the same time as another employee; plus, all parking spaces required under the Americans with Disabilities Act. These standards are not consistent with California Government Code, Section 65583(a)(4), which only allows parking to be required for shelter staff. However, **Program HIP-43. Update the City's Zoning Ordinance and Specific Plans Related to Emergency Shelters, Low-Barrier Navigation Centers, Transitional and Supportive Housing, and Group Care Facilities to Comply with Current Laws, will bring the City's Zoning Ordinance into compliance with State law**.
- Shelter Capacity. No emergency shelter shall contain more than ten beds. The maximum number of beds in all emergency shelters in the City shall not be less than the number of unsheltered homeless persons in Millbrae as determined in San Mateo County's most recent homeless survey.
- Amenities. In order to ensure unhoused residents receive appropriate services at emergency shelters, the City also requires a number of amenities, such as bicycle parking, waiting areas, exterior lighting, laundry facilities, and personal property storage.

While emergency shelters are permitted by right and without discretionary action throughout the Downtown and El Camino Real Specific Plan area, commercial zones, and industrial zones, **the Millbrae Zoning Ordinance does not clearly specify that they are allowed in all residential zones in the City**. In order to bring the City to compliance, the Housing Element includes **Program HIP-43, Update the City's Zoning Ordinance and Specific Plans Related to Emergency Shelters, Low-Barrier Navigation Centers, Transitional and Supportive Housing, and Group Care Facilities to Comply with Current Laws.**

Unmet Need

To determine whether by-right zones can adequately accommodate the "unmet need" for emergency shelter as required by SB 2, a jurisdiction must first establish the extent of its unmet need for emergency shelter. While the law does not prescribe a specific formula, it draws guidance from HCD. The process involves several key steps:

1. Assess the number of unsheltered homeless individuals, considering seasonal and year-round requirements.

- *As previously mentioned, the 2022 point-in-time count reported 1,092 people experiencing unsheltered homelessness in San Mateo County, of which **nine are in Millbrae**.*

2. Subtract the number of existing vacant shelter beds, transitional housing, and supportive housing units available to the homeless population, ensuring a match between available resources and the needs of the homeless.

    - *There are **no existing shelter beds in Millbrae**.*

3. Subtract qualifying pipeline beds and units. The unmet need can be further adjusted by subtracting qualifying pipeline beds or units, either based on a 10-year plan to end chronic homelessness or through multijurisdictional agreements.

    - *There are **no pipeline shelter beds in Millbrae**.*

4. Finally, the jurisdiction arrives at the unmet need, which represents the required shelter for homeless individuals throughout the year. These steps are presented in detail in the following table.

Based on the above methodology, the City has the following unmet need:

(9 unsheltered persons) – (0 available beds) – (0 pipeline beds) = 9 beds

The City has identified potential sites within the MSASP that are adequate to accommodate emergency shelters. Of the five total sites (listed below), three allow for residential development (APNs: 024-174-330, 024-181-130, and 024-362-010). **The sites can accommodate enough beds for the unmet need for shelter beds in Millbrae.** Currently, emergency shelters are not permitted by-right and without discretionary action in the MSASP, but **Program HIP-43, Update the City's Zoning Ordinance and Specific Plans Related to Emergency Shelters, Low-Barrier Navigation Centers, Transitional and Supportive Housing, and Group Care Facilities** will amend the Zoning Ordinance to permit emergency shelters in the identified sites and within the MSASP.

The following vacant sites within the Millbrae Station Area Specific Plan are adequate to accommodate emergency shelters:

- **APN: 024-174-330** (North of Millbrae BART-Bay 12 West Busway)
    - Public Facilities (PF)/Residential Overlay Zone
    - Permits residential use.
- **APN: 092-030-050** (East of Aviador Avenue);
    - Public Facilities Zone
- **APN: 024-181-130** (300 Millbrae Avenue)

  - Transit-Oriented Development Zone
  - Permits residential use.

The following non-vacant sites within the Millbrae Station Area Specific Plan adequate to accommodate emergency shelters. Both sites have a low improvement land value ratio and FAR, indicating a higher likelihood of redevelopment.

- **APN: 024-362-010** (111 Rollins Road)
  - Employment Center / Light Industrial Zone
  - Improvement Land Value Ratio: 0.15
  - Building Age: 68 years
  - FAR: 0.31
- **APN: 024-362-110** (370 Adrian Road)
  - Residential Mixed Use (RMU) Zone
  - Permits residential use.
  - Improvement Land Value Ratio: 0.18
  - Building Age: 64 years
  - FAR: 0.31

Environmental Quality

As discussed on p. B-83 of Appendix B – AFFH, the City utilized the TCAC Opportunity Areas Environmental Scores to analyze the sites' proximity to environmental hazards. The TCAC's opportunity areas environmental scores are based on the CalEnviroScreen 3.0 indicators, which include ozone, PM2.5, diesel PM, drinking water, pesticides, toxic release, traffic, cleanup sites, groundwater threats, hazardous waste, impaired water bodies, and solid waste sites. The average scores provide a percentile rank for how each census tract ranks in comparison to others throughout the State. The higher the score is, the lower exposure to the pollution characteristics.

The City of Millbrae is divided for environmental outcomes. In the eastern areas of the City adjacent to the San Francisco Airport, census tracts have scores less than 0.25. However, in the west areas of the City, scores are greater than 0.5 (See Figures III-12, Figure III-13, and Figure III-14 in Appendix B - AFFH). As discussed in p. B-83 of Appendix B – AFFH, nearly 100% of the sites are located in the Downtown and El Camino Real Specific Plan and score low on CalEnviroScreen mainly due to diesel particulate matter from the San Francisco Airport (SFO). **Similarly, to the sites, emergency shelters are allowed and would be built in the Downtown and El Camino Real Specific Plan, as well as the area east of it.**

Although emergency shelters would be located in the eastern part of the City, they would be located in close proximity to Millbrae Station, close to transportation, services, and jobs. The State published a study titled "California's Housing Future: Challenges and Opportunities Final Statewide Housing Assessment 2025" (2025 Assessment). The 2025 Assessment emphasizes

throughout the document that the location of housing (including affordable housing and emergency shelters) near transit and job centers is an important policy and implementation strategy.

In addition, HCD's Intersectional Policy Work webpage asserts the following regarding housing and transportation:

> *"After housing, transportation is the second-largest household expense… People who live near transit and job centers drive less, particularly lower-income residents. More recently, however, those areas have become less and less affordable. Housing near transit is in high demand, and rents and property values near transit are 10 to 20 percent higher on average than similar homes further from transit. Modeling and analysis by the Legislative Analyst's Office suggest 'California's high housing costs cause workers to live further from where they work, likely because reasonably priced housing options are unavailable in locations nearer to where they work.' When households move further from job- and transit-rich areas to find more affordable homes, they encounter higher transportation costs and longer commutes. Beyond the quality-of-life consequences for individual households, longer commutes also increase greenhouse gas emissions and decrease productivity."*

As stated by HCD, lower-income households (including residents at risk of and experiencing homelessness) are especially vulnerable to higher housing cost burden. The increase in housing costs in the Bay Area, especially near transportation, can force individuals to lose their housing or move further away from job centers. Moving away and "over-commuting" can lead to increased transportation costs and even loss of employment for an already-impacted portion of our community. Millbrae's plan for the development of affordable housing and emergency shelters near the Downtown and El Camino Real Specific Plan area provides lower-income families, who would be more vulnerable to extreme housing cost burden, with more opportunities to live near amenities, services, job centers and transportation.

Prioritizing the City's available sites closest to transportation and job centers for lower-income families is an important goal of this Housing Element. However, the City also considers environmental hazards to be an important consideration and will take steps to mitigate the effects to residents in this area with the following programs:

- **HIP-7.** Residential Energy Conservation Program
- **HIP-8.** Energy Conservation Grant Funding
- **HIP-9.** Reduce Exposure to Environmental Pollution

- **HIP-10.** Coordinate with the SFO Community Roundtable and C/CAG to Monitor Noise and Air Quality Outcomes

3.4.6.2 Transitional and Supportive Housing

State law requires transitional and supportive housing to be defined as a residential use and subject only to the same regulations as comparable residential uses. The City's Zoning Ordinance defines transitional and supportive housing as follows:

> ***Transitional Housing:*** *One or more buildings physically configured as rental housing developments but operated under program requirements that call for the termination of assistance and recycling of the assisted units to other eligible program recipients at some predetermined future point in time.*
>
> ***Supportive Housing:*** *Housing occupied by the target population, as defined in subdivision (d) of Section 53260 of the California Government Code, and that is linked to on- or off-site services that assist the supportive housing residents in retaining the housing, improving their health status, and maximizing their ability to live and, when possible, work in the community.*

Pursuant to California Government Code Section 65583 (c)(3), "transitional housing and supportive housing shall be considered a residential use of property and shall be subject only to those restrictions that apply to other residential dwellings of the same type in the same zone." **Similar to emergency shelters, transitional and supportive housing developments are permitted by right and without discretionary action throughout the Downtown and El Camino Real Specific Plan area, commercial zones, and industrial zones.** In order to bring the City to compliance, the Housing Element includes Program HIP-43, Update the City's Zoning Ordinance and Specific Plans Related to Emergency Shelters, Low-Barrier Navigation Centers, Transitional and Supportive Housing, and Group Care Facilities to Comply with Current Laws.

AB 2162 also prohibits minimum parking requirements for supportive housing within 0.5 miles of public transit. **The current parking requirement for emergency shelters is 0.35 spaces per bed (rounded up to the nearest space), plus one space per employee that is working at the same time as another employee.** This is in addition to the spaces required by the American Disabilities Act (ADA). The City's parking requirements for emergency shelters exceed the limits imposed by the State and will, therefore, be addressed through Program HIP-43, Update the City's Zoning Ordinance and Specific Plans Related to Emergency Shelters, Low-Barrier Navigation Centers, Transitional and Supportive Housing, and Group Care Facilities to Comply with Current Laws.

3.4.6.3 Low Barrier Navigation Centers

Adopted in 2019, AB 101 defines a Low-Barrier Navigation Center as "a Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing." Low-Barrier shelters may include options such as allowing pets, permitting partners to share living space, and providing storage for residents' possessions.

AB 101 requires jurisdictions to permit Low-Barrier Navigation Centers that meet specified requirements by right in mixed-use zones and other nonresidential zones permitting multifamily residential development. These provisions sunset on December 31, 2026. The bill also imposes the following timelines for cities to act on an application for the development of a Low-Barrier Navigation Center:

- Within 30 days of receiving an application for a center, a City must notify the applicant whether the application is complete.
- Within 60 days of a completed application, a City must act on the application.

Currently, the Zoning Code and both specific plans are silent on low-barrier navigation centers. The Housing Plan includes the following program to bring the City's Zoning Ordinance and specific plans into compliance with State law.

- **Program HIP-43. Update the City's Zoning Ordinance and Policies Related to Emergency Shelters, Low-Barrier Navigation Centers, Transitional and Supportive Housing, and Group Care Facilities to Comply with Current Laws.**

3.4.7 Accessory Dwelling Units

An ADU is an attached or detached residential unit that provides complete independent living facilities (i.e., kitchen, sleeping facilities, and full bathroom facilities) for one or more people and is located on the same lot as a single-family or multifamily dwelling. A junior accessory dwelling unit (JADU) is an ADU contained entirely within a single-family residence. JADUs include an efficiency kitchen and sleeping facilities and can include their bathroom or share a bathroom with the single-family dwelling.

Recent State legislation, including AB 68, AB 881, AB 587, AB 670, AB 671, AB 3182, and SB 13, modified the way local jurisdictions are allowed to regulate ADUs and JADUs. This legislation promotes the construction of new ADUs and JADUs and limits the ways cities can regulate their design. Under current State law, the City may adopt regulations governing the design of ADUs, but no lot coverage, FAR, open space, or minimum lot size can preclude the construction of a "Statewide exemption ADU," which is an ADU with an area up to 800 square feet, height up to

16 feet, and 4-foot side and rear yard setbacks. Further, under new State law, all jurisdictions must expand the zones and circumstances under which ADUs and JADUs are allowed. The City successfully overhauled and adopted a new ADU ordinance in 2020, which took into account recent legislation at the time, as well as community feedback received at various workshops.

As part of the Ordinance, the City adopted objective design standards for ADUs, reducing the likelihood of neighborhood opposition based on appearance. The City issued 9 permits in 2020 and 28 permits in 2021. Homeowners cite the high costs associated with the construction of ADUs, which offsets the incentives of building them. ADUs up to 749 square feet are exempt from development impact fees, but ADUs in excess of this size are charged proportionately in relation to the square footage of the primary dwelling unit based on the Single-Family Residential Fee, which is currently $71,309.30 (an ADU that is half the size of the primary dwelling on the property would be charged half this amount in development impact fees). Additionally, applicants are required to pay school district fees on a square foot basis for all new buildings or additions over 500 square feet. Another cost is from the energy code requirement that ADUs provide solar panels if the unit is new construction, non-manufactured, or detached. (ADUs that are constructed within existing space, or as an addition to existing homes, including detached additions where an existing detached building is converted from non-residential to residential space, are not subject to the energy code requirement to provide solar panels).

To date, City staff has processed all ADU and JADU applications promptly and has not denied any building permit application.

The current City permit and processing of ADUs requires the applicant to provide documentation to substantiate that they are the owner of the property and to apply for a building permit under that process, and all applicable divisions/departments review the plans submitted in accordance with State law requirements and limitations. More specifically, the parties that review the permit include the City's Building and Safety, Planning, and Public Safety departments. Generally, Planning staff reviews the ADU application for consistency against the State ADU regulations, Building and Safety would review against the Building Code, and the Central County Fire Department (CCFD) would review detached ADUs against pertinent Building and Fire Codes for access. Public Safety staff review the application against pertinent security code requirements for addressing and wayfinding for emergency response purposes.

3.4.7.1 Compliance

Housing element law requires that jurisdictions analyze their accessory dwelling unit ordinances to ensure they are compliant with state requirements. **While the City adopted a new ADU ordinance to comply with the recent state legislation at the time, new legislation has since been passed. Therefore, further updates are needed to bring the Accessory Dwelling Unit Ordinance to compliance.**

The Housing Plan in this Housing Element (Chapter 8) contains the following program to bring the Zoning Ordinance to compliance with ADU requirements:

- **Program HIP-44. Update the City's Zoning Ordinance.**

3.5 Senate Bill 35

The City has adopted a checklist for projects seeking approval for development projects under SB 35 (Chapter 366, Statutes of 2017) Streamlined Ministerial Approval Process and is reviewing several projects, including a 99-unit housing project at 1301 Broadway that includes 50% of the total units as affordable at the low-income level as well as a 30-unit project at 130-140 El Camino Real that includes 10% of the total units as affordable at the very low-income level.

3.6 Reductions to Constraints

To address the constraints identified in Chapter 3, Housing Constraints, as well as those identified by developers through the outreach process, the City has identified several initiatives that include the following programs from Chapter 8 of this Housing Element:

- **HIP-26. Coordination with Disability Rights Service Providers and Updates to Reasonable Accommodations for People with Disabilities**
- **HIP-42. Implement Reduced Parking for Affordable Housing**
- **HIP-43. Update the City's Zoning Ordinance and Specific Plans Related to Emergency Shelters, Low-Barrier Navigation Centers, Transitional and Supportive Housing, and Group Care Facilities to Comply with Current Laws**
- **HIP-44. Update the City's Zoning Ordinance**
- **HIP-45. Update the Zoning Ordinance, MSASP, and DECRSP to Comply With Residential Care Facilities Requirements**

As part of this effort, the City will follow the Housing Plan and collaborate with housing providers and stakeholders to help mitigate housing constraints in the City.

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4 HOUSING RESOURCES AND OPPORTUNITIES

This chapter provides an overview of the financial resources available to support the implementation of the City's (City or Millbrae) housing policies and programs. More specifically, the various types of Federal, State, and local financial programs that are potentially available to assist the City in fulfilling its housing need, particularly the affordable housing need (as determined by the Regional Housing Needs Allocation [RHNA]), are presented below. The grants, loans, financing tools and programs represent publicly funded tools to support the development, rehabilitation, and preservation of housing.

4.1 Identification of Adequate Sites for Future Housing Needs

State (State or California) law requires that jurisdictions provide an adequate number of sites to allow for and facilitate the production of their regional share of housing. To determine whether a jurisdiction has sufficient land to accommodate its share of regional housing needs for all income groups, that jurisdiction must identify "adequate sites." Under State law (California Government Code, Section 65583(c)(1)), adequate sites are those with appropriate zoning and development standards with services and facilities already in place needed to facilitate and encourage the development of a variety of housing for all income levels.

4.1.1 Regional Housing Targets

Table 4-1, 6th Cycle Regional Housing Needs Allocation (2023–2031), shows the 6th Cycle RHNA for the City, as determined by the Association of Bay Area Governments (ABAG), for the eight-year period (2023–2031).

Table 4-1. 6th Cycle Regional Housing Needs Allocation (2023-2031)

Income Category	Dwelling Units
Extremely Low/Very Low Income (0-50% AMI)	575
Low Income (51-80% AMI)	331
Moderate Income (81-120% AMI)	361
Above Moderate Income (Above 120% AMI)	932
Total	**2,199**

Housing Element law does not require the City to ensure that the number of dwelling units identified in the RHNA is built within the Planning Period. However, the law requires that the City provide an

inventory of land suitably zoned and with available infrastructure and utilities to meet that need. California Government Code, Section 65583.2(c)(3)(B), specifies that a minimum density of 30 units per acre is necessary to meet the City's low- and very low-income housing needs. Additionally, California Government Code, Section 65583.2(c)(4)(A) requires housing elements due after January 1, 2022 (for metropolitan and suburban jurisdictions) to allocate 25% of their RHNA numbers for moderate- and above moderate-income housing to sites with zoning that allows at least four units of housing, with moderate-income sites being capped at a density of 100 units per acre (effective as of January 1, 2021).

4.2 Financial Resources

A variety of funding sources in the form of grants or loans through the Federal government exist to support housing. They range from annual allocations of formula-entitled grants to Section 108 loan programs and vouchers. The programs and resources in this chapter represent available funding sources used by the City to date as applicable.

4.2.1 Federal Funding Sources

Current Federal funding sources available for affordable housing (including special needs populations) and homelessness solutions are presented in this chapter.

4.2.1.1 U.S. Department of Housing and Urban Development Entitlement Funding

In 2018, a consortium of jurisdictions (Atherton, Belmont, Brisbane, Burlingame, Colma, East Palo Alto, Foster City, Half Moon Bay, Hillsborough, Menlo Park, Millbrae, Pacifica, Portola Valley, San Bruno, San Carlos, Woodside, and San Mateo County) prepared the 2018-2022 Consortium Consolidated Plan (Consolidated Plan) as required to receive Community Development Block Grants (CDBG), Emergency Solutions Grant (ESG), and HOME Investment Partnerships Program (HOME) entitlement grant funds from U.S. Department of Housing and Urban Development (HUD). The Consolidated Plan provides HUD with a comprehensive assessment of the City's housing and community development needs and outlines the City's priorities, objectives, and strategies for the investment of CDBG, ESG, and HOME funds to address these needs over the next five years, beginning July 1, 2018, and ending June 30, 2022. The Millbrae portion of the Consolidated Plan is referenced in this section.

The City has over $13 million in its Low- and Moderate-income Housing Asset Fund per the 2020-21 Annual Comprehensive Financial Report and receives CDBG funds from HUD on a formula basis each year and, in turn, awards grants and loans to nonprofit, for-profit, or public organizations for programs and projects in furtherance of the Consolidated Plan. These

programs provide for a range of eligible activities to address the needs of the City's residents, as discussed below.

During the five years of the Consolidated Plan, the County (San Mateo County or County) anticipates an estimated $14.6 million in CDBG funds, although the final amount of funding the City will receive is subject to Federal appropriations and changes in the types of data used to allocate formulas to each program.

Housing Opportunities for People with AIDS

Housing Opportunities for Persons with AIDS (HOPWA) provides housing assistance and related supportive services for low-income people living with HIV/AIDS and their families. HOPWA funds may be used for a range of housing, social services, program planning, and development costs, including but not limited to the acquisition, rehabilitation, or new construction of housing units; costs for facility operations; rental assistance; and short-term payments to prevent homelessness. To date, the City has not received funding from this source, as it is not eligible to receive funding.

Section 108 Loan Guarantee Program

The Section 108 Loan Guarantee Program is the loan guarantee provision of the CDBG program. This provision provides communities with a source of financing for various housing and economic development activities. Rules and requirements of the CDBG program apply, and therefore, projects and activities must principally benefit low- to moderate-income people, aid in the elimination or prevention of blight, and/or meet the urgent needs of the community.

Monies received per the Section 108 Loan Guarantee Program are limited to no more than five times the applicant's most recently approved CDBG amount, less prior Section 108 commitments. Activities eligible for these funds include economic development activities eligible under CDBG; acquisition of real property; rehabilitation of publicly owned property; housing rehabilitation eligible under CDBG; construction, reconstruction, or installation of public facilities; related relocation; clearance or installation of public facilities; payment of interest on the guaranteed loan and issuance costs of public offerings; debt service reserves; and public works and site improvements.

Section 108 loans are secured and repaid by pledges of future and current CDBG funds. Additional security requirements may also be imposed on a case-by-case basis. It is important to note that, although the loan may be repaid with CDBG, the City would incur interest charges and administrative costs. If CDBG funds are reduced or eliminated in the future, the City's General Fund would need to pay a loan payment in addition to whatever the City is required to pledge as collateral. To date, this loan has not been necessary to provide funding for the City's community development objectives, but this could change in future years.

Section 8 Housing Choice Voucher Program

The Federal Section 8 Housing Choice Voucher Program (Section 8) provides rental subsidies to extremely low- and very low-income households, including families, seniors, and people with disabilities. The Housing Authority of the County of San Mateo (HACSM) oversees and administers the Section 8 voucher program for participating jurisdictions, including the City. In 2021, the HACSM administered 5,288 Section 8 vouchers to households throughout San Mateo. As of June 30, 2022, the HACSM distributed 81 vouchers to City households. Of these, 34 vouchers were issued to disabled households, 34 vouchers were issued to senior households, 14 vouchers were issued to elderly and disabled households, and 27 were issued to families. Of the 81 vouchers issued, 2 Veterans Affairs Supportive Housing (VASH) vouchers went to veterans (2 disabled households, 0 senior households, and 0 families). The HACSM monitors all units to ensure they are in acceptable condition and meet the Section 8 Housing Quality Standards (HQS).

4.2.2 State Funding Sources

The funding currently and historically available through the California State Department of Housing and Community Development (HCD) and the California Tax Credit Allocation Committee (CTCAC) is presented in this chapter. While it is unknown what State funding will be available after next year, it is expected that the State will provide funding for projects for unhoused and lower-income households given the housing crisis.

In May 2022, the State's FY 2022–2023 budget revision (May Revision) included the following:

- Homelessness Package - $2 billion in one-time General Fund over two years intended to address near-term homelessness needs while previously authorized funding for long-term housing solutions are implemented. Specifically, the budget proposes $1.5 billion to the Department of Health Care Services' Behavioral Health Continuum Infrastructure Program for housing support for people with behavioral health needs. Many details of this proposal are still under development. Additionally, $500 million for the Encampment Resolution Grants Program in 2022-23 administered by the California Interagency Council on Homelessness to provide targeted grants to local governments to rehouse individuals living in encampments. The May Revision builds on that investment providing additional interim bridge housing solutions and includes funding to support the administration of the Community Assistance, Recovery, and Empowerment (CARE) Court framework.

- Housing Development Package (Expands Existing Programs) – The May Revision proposes an additional $500 million in one-time funds over 2023-24 and 2024-25 to remove barriers to building more downtown-oriented and affordable housing through

funding adaptive reuse. This added to the $100 million one-time funds included in the Governor's Budget, total adaptive reuse investments total $600 million over three years. Affordable Housing Package (Expands Existing State Programs) - $1 billion in one-time General Fund over two years for affordable housing development. Specifically, the budget proposes $500 million for tax credits to builders of rental housing affordable to low-income households, $200 million for mixed-income housing, $200 million to preserve affordable housing units and $100 million to preserve affordable mobile homes. The portion of funding the City may receive from these sources is unknown because of the highly competitive process to receive an award, but the City will track and pursue all available funding sources for affordable housing during the 2023-2031 6th Cycle Planning Period.

The May Revision reflects the State's commitment to equitably build more affordable and climate-smart housing for Californians and expand access to housing for vulnerable populations, including individuals with complex behavioral health conditions and people living in unsheltered settings. In total, the Budget includes $9.1 billion for housing resources and $9.4 billion for homelessness resources in 2022-23.

The programs below are existing and historical State funding sources that are anticipated to continue during the next eight-year period.

4.2.2.1 Low-Income Housing Tax Credits (Federally Funded for the Most Part/State Administered)

The CTCAC administers the Federally funded Low-Income Housing Tax Credit (LIHTC) program to encourage private investment in affordable rental housing for households meeting certain income requirements. Credits are available for new construction projects or existing properties undergoing rehabilitation. Two types of Federal tax credits administered by the State are available and are generally referred to as 9% and 4% credits, respectively. Each number refers to the approximate percentage that is multiplied against a project's requested "qualified basis" to determine the amount of annual Federal credits CTCAC will award the project.

According to the CTCAC 2020 Annual Report, $748 million in 9% tax credits were awarded to affordable housing projects. Because 9% credits provide for a larger source of funding, this source is competitive, and awards are made twice per year. Projects compete on point scoring, but since most projects receive the maximum, the CTCAC's tiebreaker formula generally decides the outcomes. This tiebreaker formula is based on the total development costs of a project and the number of other financing sources a proposed project can secure. Generally, the lower the development costs and the higher the number of other funding sources, the higher the tiebreaker score will be.

The 4% tax credits derive from a project's use of tax-exempt bond authority allocated by the California Debt Limit Allocation Committee (CDLAC) and are limited only by the amount of bond cap available to California. In 2020, the CTCAC awarded $504 million in tax credits. Historically, the CTCAC awards 4% tax credits non-competitively (i.e., over the counter) to all projects that meet threshold criteria, but in recent years, this source of funding has become competitive.

Recognizing the extremely high cost of developing housing in California, the State Legislature authorized a State LIHTC program to augment the Federal LIHTC program. Authorized by Chapter 1138, Statutes of 1987, the State LIHTC is only available to a project that has previously received or is concurrently receiving an allocation of Federal credits. Thus, the State LIHTC program does not stand alone but instead, supplements the Federal LIHTC program. In 2020, the State authorized $500 million in State LIHTCs. These are one-time credits taken over four years; thus, there is no ten-fold multiplier. Because State LIHTCs are also in limited supply, the CTCAC awards them competitively. In total, 85% of the State credits are integrated into 9% tax credit projects, while the remainder of State LIHTCs is reserved for 4% tax credit projects.

It is important to note that, with the increased focus on homelessness and increased funding to address the rising annual point-in-time counts of people experiencing homelessness each year, permanent supportive housing projects have increased substantially throughout the State. These projects typically serve the deepest level of affordability for extremely low-income households earning at or below 30% of AMI. As a result of the increase in tax credit applications for permanent supportive housing, all tax credits (9% and 4%) have become increasingly competitive. The trend observed over the last year indicates that an award of 9% tax credits is not feasible for projects that do not include some component of permanent supportive housing. Thus, projects focused on low-income units or a mix of very low- and low-income units are now applying for 4% tax credits, which represent significantly less funding. Overall, the demand for this significant funding source critical to the development of lower-income housing greatly outweighs the supply of funding, which makes the development of affordable housing more challenging.

4.2.2.2 Affordable Housing and Sustainable Communities Program

The Affordable Housing and Sustainable Communities (AHSC) Program funds land use, housing, transportation, and land preservation projects that support infill and compact development and reduce GHG emissions in disadvantaged communities. Funds are available in the form of loans and/or grants in two project areas: Transit Oriented Development (TOD) and Integrated Connectivity (ICP). There is an annual competitive funding cycle. The May Revision shows $75 million of funding for the program.

4.2.2.3 CalHome Program

CalHome provides grants to local public agencies and nonprofit corporations to assist very low- and low-income people or families to become first-time homebuyers or assist current homeowners. Eligible activities include deferred-payment loans for down payment assistance for first-time homebuyers, home rehabilitation (for existing homeowners), homebuyer counseling, self-help mortgage assistance, or technical assistance for self-help homeownership. All funds to individual homeowners are in the form of loans. Funds can also be used to assist in the development of multiple-unit ownership projects.

4.2.2.4 California Emergency Solutions and Housing Program

The California Emergency Solutions and Housing (CESH) Program provides grant funds to assist people experiencing or at risk of homelessness. Eligible activities include housing relocation and stabilization services (including rental assistance), operating subsidies for permanent housing, flexible housing subsidy funds, operating support for emergency housing interventions, and systems support for homelessness services and housing delivery systems. Eligible applicants are Administrative Entities (AEs) (local governments, nonprofit organizations, or unified funding agencies) designated by the Continuum of Care (COC) to administer CESH funds in their service area. The HCD administers the CESH Program with funding from the Building Homes and Jobs Act Trust Fund (Senate Bill 2, Chapter 364, Statutes of 2017).

4.2.2.5 Golden State Acquisition Fund

The Golden State Acquisition Fund (GSAF) was seeded with $23 million from HCD's Affordable Housing Innovation Fund. Combined with matching funds, the GSAF makes up to five-year loans to developers for the acquisition or preservation of affordable housing. Loans are a maximum of $13,950,000, and funds are made available over the counter.

4.2.2.6 Homekey Program

The Homekey Program provides grants to local entities (including cities, counties, and other local public entities, such as housing authorities and federally recognized tribes) to acquire and rehabilitate a variety of housing types, such as hotels, motels, vacant apartment buildings, and residential care facilities, to serve people experiencing homelessness or who are also at risk of serious illness from COVID-19. The May Revision included an additional round of funding for the fiscal year 2022-23 of $1.3 billion for continued Homekey acquisitions.

4.2.2.7 Housing for a Healthy California Program

The Housing for a Healthy California (HHC) Program provides funding on a competitive basis to deliver supportive housing opportunities to developers using the Federal National Housing Trust

Fund (NHTF) allocations for operating reserve grants and capital loans. The HHC Program creates supportive housing for individuals who are recipients of or eligible for healthcare provided through the California Department of Health Care Services Medi-Cal Program. The goal of the HHC Program is to reduce the financial burden on local and State resources due to the overutilization of emergency departments, inpatient care, nursing home stays, and the use of corrections systems and law enforcement resources as the point of healthcare provision for people who are chronically homeless or homeless and a high-cost health user.

4.2.2.8 Housing Navigators Program

Housing Navigators Program (HNP) allocates $5 million in funding to counties for the support of housing navigators to help young adults aged 18–21 years secure and maintain housing, with priority given to young adults in the foster care system.

4.2.2.9 Infill Infrastructure Grant Program

The Infill Infrastructure Grant Program (IIG) provides grant funding for infrastructure improvements for new infill housing in residential and/or mixed-use projects. Funds are made available through a competitive application process. The May Revision allocated $225 million towards the IIG.

4.2.2.10 Local Housing Trust Fund Program

Affordable Housing Innovation's Local Housing Trust Fund (LHTF) Program lends money for the construction of rental housing projects with units restricted for at least 55 years to households earning less than 60% of AMI. State funds match local housing trust funds as down payment assistance to first-time homebuyers.

4.2.2.11 Multifamily Housing Program

The Multifamily Housing Program (MHP) provides low-interest, long-term deferred-payment permanent loans for new construction, rehabilitation, and preservation of permanent and transitional rental housing for lower-income households.

4.2.2.12 National Housing Trust Fund

The NHTF is a permanent Federal program with dedicated source(s) of funding not subject to annual appropriations. The funds can be used to increase and preserve the supply of affordable housing, with an emphasis on rental housing for extremely low-income households earning at or below 30% of AMI. In 2021, California received approximately $10.1 million for the program. No information about the 2022 funding has been released.

4.2.2.13 No Place Like Home Program

The May Revision states that $400 million is budgeted for the No Place Like Home Program (NPLH). This program is funded through bond proceeds to invest in the development of permanent supportive housing for people who need mental health services and are experiencing homelessness or chronic homelessness or are at risk of chronic homelessness.

4.2.2.14 Pet Assistance and Support Program

Pet Assistance and Support (PAS) Program provides funds to homeless shelters for shelter, food, and basic veterinary services for pets owned by individuals experiencing homelessness.

4.2.2.15 Permanent Local Housing Allocation

Permanent Local Housing Allocation (PLHA) from SB 2 provides a permanent source of funding to all local governments in California to help cities and counties accomplish the following:

- Increase the supply of housing for households at or below 60% of AMI.
- Increase assistance to affordable owner-occupied workforce housing.
- Assist people experiencing or at risk of homelessness.
- Facilitate housing affordability, particularly for lower- and moderate-income households.
- Promote projects and programs to meet the local government's unmet share of the RHNA.

Eligible activities include:

- The predevelopment, development, acquisition, rehabilitation, and preservation of multifamily, residential live-work, and rental housing that is affordable to extremely low-, very low-, low-, or moderate-income households, including necessary operating subsidies.
- The predevelopment, development, acquisition, rehabilitation, and preservation of Affordable rental and ownership housing, including Accessory Dwelling Units (ADUs), that meets the needs of a growing workforce earning up to 120 percent of AMI, or 150 percent of AMI in high-cost areas. ADUs shall be available for occupancy for a term of no less than 30 days.
- Matching portions of funds placed into Local or Regional Housing Trust Funds.
- Matching portions of funds available through the Low- and Moderate-Income Housing Asset Fund under subdivision (d) of Health and Safety Code (HSC) Section 34176.

- Capitalized Reserves for Services connected to the preservation and creation of new permanent supportive housing.
- Assisting persons who are experiencing or at risk of homelessness, including, but not limited to, providing rapid rehousing, rental assistance, supportive/case management services that allow people to obtain and retain housing, operating and capital costs for navigation centers and emergency shelters, and the new construction, rehabilitation, and preservation of permanent and transitional housing.
    - This activity may include sub-awards to administrative entities as defined in HSC Section 50490(a) (1-3) that were awarded CESH program or HEAP funds for rental assistance to continue assistance to these households.
    - Applicants must provide rapid rehousing, rental assistance, navigation centers, emergency shelter, and transitional housing activities in a manner consistent with the Housing First practices described in 25 CCR, Section 8409, subdivision (b)(1)-(6) and in compliance with WIC Section 8225(b)(8). Applicant-allocated funds for the new construction, rehabilitation, and preservation of permanent supportive housing shall incorporate the core components of Housing First, as provided in WIC Section 8255, subdivision (b).
- Accessibility modifications in lower-income owner-occupied housing.
- Efforts to acquire and rehabilitate foreclosed or vacant homes and apartments.
- Homeownership opportunities, including, but not limited to, down payment assistance.
- Fiscal incentives made by a county to a city within the county to incentivize approval of one or more affordable housing projects, or matching funds invested by a county in an affordable housing development project in a city within the county, provided that the City has made an equal or greater investment in the project. The County fiscal incentives shall be in the form of a grant or low-interest loan to an affordable housing project. Matching fund investments by both the County and the City also shall be a grant or low-interest deferred loan to the affordable housing project.

The City has not applied for this grant to date but will pursue the application in connection with the Housing Element Update.

4.2.2.16 Predevelopment Loan Program

The Predevelopment Loan Program (PDLP) makes short-term loans for activities and expenses necessary for the continued preservation, construction, rehabilitation, or conversion of assisted housing primarily for low-income households. Availability of funding is announced through a

periodic NOFA from the State. Eligible applicants include local government agencies, nonprofit corporations, cooperative housing corporations, and limited partnerships or limited liability companies where all the general partners are nonprofit mutual or public benefit corporations.

4.2.2.17 Section 811 Project Rental Assistance Program

Section 811 Project Rental Assistance offers long-term project-based rental assistance funding from HUD through a collaborative partnership with the California Housing Finance Agency (CalHFA), Department of Health Care Services (DHCS), HCD, CA Department of Developmental Sciences (DDS), and CTCAC. Opportunities to apply for this project-based assistance are through a NOFA published by CalHFA.

4.2.2.18 Supportive Housing Multifamily Housing Program

The Supportive Housing Multifamily Housing Program (SHMHP) provides low-interest loans to developers of permanent affordable rental housing with supportive housing units.

4.2.2.19 Transit-Oriented Development Housing Program

The TOD program provides low-interest loans and grants for rental housing that includes affordable units located within a one-quarter mile of a transit station. Eligible applicants include cities, counties, transit agencies, developers, and redevelopment agencies. Applications are accepted in response to a periodic NOFA.

4.2.2.20 Transitional Housing Program

The Transitional Housing Program allocates $8 million in funding to counties for housing stability to help young adults aged 18 to 25 years secure and maintain housing, with priority given to young adults formerly in the foster care or probation systems.

4.2.2.21 Veterans Housing and Homelessness Prevention Program

The Veterans Housing and Homelessness Prevention (VHHP) Program provides long-term loans for the development or preservation of rental housing affordable to very low and low-income veterans and their families. For-profit and nonprofit developers and public agencies are eligible for these loans, which are announced annually through a NOFA released by May of each year and are administered by HCD.

4.2.3 Quasi-Government Agencies

4.2.3.1 Federal Home Loan Bank – Affordable Housing Program

The purpose of the Affordable Housing Program (AHP) is to subsidize the interest rates on advances or loans made by the Federal Home Loan Bank system to a member bank and to provide direct subsidies to these banks. The banks then pass these subsidized interest rates and direct subsidies onto housing developers to assist them with financing the development of affordable rental housing. The subsidies must be used to finance the purchase, construction, and/or rehabilitation of rental housing, of which at least 20% of the units will be occupied by and affordable for very low-income households for at least 15 years.

4.2.3.2 Fannie Mae/Freddie Mac – National Housing Trust Fund

The NHTF was established as part of the Housing and Economic Recovery Act of 2008 (HERA) to provide grants to states for the addition and preservation of affordable rental housing serving extremely low and very low-income households., This funding source can also be used to assist in the provision of affordable homeownership opportunities for lower-income families and individuals. HERA requires Fannie Mae and Freddie Mac to transfer a percentage of their new business to finance the Trust Fund.

4.2.4 Local Entities/Programs/Funding Sources

The Millbrae City Council adopted a comprehensive affordable housing regulation policy package on July 13, 2021. These new regulations include the following components:

- Ordinance No. 787, adding Article XXXIII Section 10.05.3300 et seq. Affordable Housing On-Site and In-Lieu Fee Requirements and Article XXXIV Section 10.05.3400 et seq. Affordable Housing Commercial Linkage Impact Fee to Chapter 10.5 of Title 10 of the Millbrae Municipal Code.
- City Council Resolution No. 21-49, Adopting Affordable Housing Requirements and Program Regulations.
- City Council Resolution No. 21-50, Establishing Affordable Housing In-Lieu Fees for Residential Development Projects and Commercial Linkage Impact Fees for Commercial Development Projects.

4.2.4.1 Commercial Linkage Fee Revenues

The purpose of the Affordable Housing Commercial Linkage Impact Fee Ordinance is to establish requirements for an affordable housing commercial linkage impact fee applicable to new commercial development projects to address the impacts of their projects on the demand for affordable housing by contributing to the supply of housing for households with very low, low,

and moderate incomes. These requirements will increase the supply of affordable housing to a broad range of households with varying income levels within the City and will help implement the Housing Element by creating a fiscal mechanism to meet the demand for additional affordable housing created by new commercial development.

The adopted fees are as follows:

- Visitor Accommodations - $3,868.00 per hotel room
- Retail Sales, Eating and Drinking, Entertainment, Personal Services, Pet-Related Services, Vehicle Related - $5.80 per gross square foot
- Offices - $12.86 per gross square foot

The City has not collected any Commercial Linkage fee revenues to date.

4.2.4.2 Inclusionary Housing Fees

The City also adopted an Inclusionary Housing ordinance that requires new ownership units developed in the City to include affordable units at one of the following income levels:

- 15% of the dwelling units as moderate-income ownership units.

For new rental units, the City requires that affordable units in either of the following income categories be included:

- 5% of the dwelling units as low-income rental units.
- 10% of the dwelling units as very low-income rental units.

The City allows developers to pay an in-lieu fee that ranges from approximately $285,000 to $376,000 per unit rather than build affordable units as part of a project. The City has not collected Inclusionary Housing fees to date. Developers have taken advantage of density bonuses to fulfill inclusionary requirements.

4.2.4.3 General Fund

According to the City's 2020-21 Annual Comprehensive Financial Report, no General Fund monies have been designated for affordable housing projects in the City. However, the City's 2022-23 budget shows $13.9 million in the Low- and Moderate-Income Housing Asset Fund with revenues for affordable housing. The revenues originate from the low and moderate-income set-aside funds of the former Millbrae Redevelopment Agency.

4.3 Opportunities for Energy Conservation

The construction of energy-efficient buildings can add to the production costs of ownership and rental housing. Over time, however, housing with energy conservation features should reduce occupancy costs as the consumption of fuel and electricity is decreased. This can result in monthly housing costs that are equal to or less than what they otherwise would have been had no energy conservation devices been incorporated into the new residential buildings.

4.3.1 State Regulations

Title 24 of the California Administrative Code establishes energy conservation standards that must be applied to all new residential buildings. The regulations specify an energy-saving design for walls, ceilings, and floor installations, as well as heating and cooling equipment and systems, gas cooling devices, conservation standards, and the use of non-depleting energy sources, such as solar energy or wind power. Compliance with the energy standards is achieved by satisfying applicable mandatory measures and an energy budget.

Residential developers must comply with these standards in California Energy Code (Title 24, Part 6) while localities are responsible for enforcing the energy conservation regulations.

4.3.2 State and Federal Programs

The California Department of Community Services and Development in partnership with the network of local community services agencies that assist lower-income households administers the Low-Income Home Energy Assistance Program, which provides financial assistance to lower-income households to offset the costs of heating and/or cooling their residences.

4.3.3 Private Sector Programs

The following private-sector energy conservation programs are available to housing developers and City residents:

- Power On Peninsula – solar panels and battery backup
- Heat Pump Water Heater Rebates - Peninsula Clean Energy (electric heat pump water heaters)
    - San Mateo County residents are eligible for $2,500 to replace a gas water heater with a heat pump water heater.
    - California Alternate Rates for Energy (CARE) and Family Electric Rate Assistance (FERA) Program customers, or those upgrading an electrical panel, are eligible for larger rebates.

- Free Energy Savings Program - HomeIntel
  - Online analysis of home energy use based on Pacific Gas and Electric (PG&E) smart meter data for no charge.
  - Customized recommendations that typically include low-or no-cost fixes, an energy coach, and regular email updates.
- Energy Upgrade California, San Mateo County.
  - Energy Upgrade California is a Countywide and Statewide residential energy efficiency program offering resources, rebates, and information to homeowners for home energy improvements. As part of the program, homeowners have access to a list of approved contractors who are eligible to install energy upgrades and secure rebates for completed work.
- PG&E - offers a variety of rebates for new energy-efficiency appliances, HVAC units, and pool pumps.
- San Mateo County Energy Watch - Turn-key Energy Efficiency Retrofit Program.
  - Energy efficiency resources for businesses.
  - Small and medium-sized businesses can take advantage of the which provides free energy assessments and subsidized energy efficiency upgrades of lighting and refrigeration systems, with free project management.
- Property Assessed Clean Energy Financing for Residents and Businesses
  - The City has authorized three Property Assessed Clean Energy (PACE) programs to operate in Millbrae. PACE programs are an innovative financing solution to help reduce the upfront costs of renewable energy and energy efficiency projects. By allowing property owners to spread the cost of a project over many years as part of the owner's annual property tax payments, PACE programs make renewable energy and energy efficiency projects more affordable for property owners interested in saving energy and reducing their utility bills.
  - The various allowable PACE programs offer options for property owners to choose from. All of the City's PACE programs may be used to finance renewable energy, energy and water efficiency improvements, and electric vehicle charging infrastructure. Water-efficient landscaping projects range from drip irrigation to artificial turf installation and can also include graywater reuse systems, rotating sprinkler nozzle installation, and other drought-tolerant landscaping upgrades. In addition, seismic retrofit financing may be included.

4.4 Local Measures and Programs

The 5th Cycle Housing Element references numerous local policy programs to remove governmental constraints to the maintenance, improvement, and development of housing. The following programs were implemented during the 5th Cycle to remove or mitigate constraints.

- **Incentives for Affordable Housing**. Continue to approve housing at higher densities when affordable units are provided, consistent with environmental constraints, surrounding development patterns, and design excellence (architecture, site planning, amenities, etc.). In the last 2-3 years, the City has approved multiple residential projects involving over 2,000 housing units through density bonuses and reduced parking requirements.
- **Update and Implement the Millbrae Station Area Specific Plan/Lot Consolidation within the Millbrae Station Area**. The City updated the Millbrae Station Area Specific Plan in 2016 and has approved to date, over 400 housing units have been approved and are under construction, including a project for veterans with 80 very low and low-income units.
- **Adopt Requirements for Accessory Dwelling Units (ADUs)/Second Units**. Consistent with State legislation for second units (including AB 1866), the City adopted an ADU Ordinance in 2020, under Ordinance 782.
- **Inclusionary Housing and/or Impact Fee Requirements**. The City adopted an inclusionary housing ordinance in July 2021 that requires 15% of all new housing units developed to be affordable to very low, low, and/or moderate-income households. The ordinance also allows developers the flexibility to pay an in-lieu fee rather than build affordable units as part of a project.
- **Parking Requirements in Downtown Area**. Payment of an in-lieu parking fee will continue to be an option for developers. In-lieu parking fees will be used to build a parking garage or will be spent on other measures to manage the parking need.
- **Affordable Housing Development on City-Owned and Other Agency-Owned Land**. The City will investigate opportunities for affordable housing on City-owned and other agency-owned land in Millbrae, including the following actions to promote the development of affordable housing on two City-owned parking lots on Magnolia Avenue and El Camino Real:
    - Utilize flexible zoning standards that facilitate the development of the maximum number of affordable units. Require no more than one uncovered, off-street parking space per unit and consider off-site parking in fulfillment of the parking requirement.

  - Seek partnerships with non-profit organizations to develop and maintain the units.
  - Provide financing from funds raised through the City's in-lieu affordable housing fees.
  - Seek additional funding through State and Federal programs, community foundations, and local housing trust funds.
  - Maintain the units as affordable rental housing for moderate, low, and very low/extremely low-income households, utilizing income eligibility requirements and affordability standards as published annually by HCD. Encourage affordability requirements that will enable the City to meet its regional housing needs.

- **Commercial Linkage Fee Study**. The City retained a consultant to prepare a commercial linkage fee study and subsequently adopted commercial linkage fees in July 2021 to help fund affordable housing.
- **Density Bonus**. The City adopted a density bonus ordinance, consistent with State law, in 2015.

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5 HOUSING ACCOMPLISHMENTS

The review of the City's 5th Cycle Housing Element provides an opportunity to reflect on past achievements and challenges; and identify what is working and what is impeding the City of Millbrae (City or Millbrae) from meeting the community's housing needs. Millbrae implemented several programs as part of its 5th Cycle Housing Element to increase housing production, assist households with special needs, create equal opportunity to housing, protect and conserve existing housing stock, further energy conservation and sustainable development, and conduct code amendments to comply with state law.

The following summary highlights key accomplishments and challenges from the 5th Cycle Planning Period (2015 – 2022). This information will help the 6th Cycle Housing Element Update to build on success, respond to lessons learned, and position the City to achieve the community's housing priorities.

5.1 2015-2023 RHNA Progress

The Regional Housing Needs Allocation (RHNA) by income category that was established for Millbrae by the Association of Bay Area Governments in the 5th Cycle is shown in Table 5-1, 2015-2023 RHNA Progress – Permitted Units. Additionally, Table 5-1 shows the number of residential building permits issued during the 5th Cycle Planning Period and the remaining RHNA. Between 2015 and 2022, a total of 461 units were permitted. However, 314 of the total units permitted were above-moderate units, exceeding the required units by 57. Under state law, above-moderate units permitted beyond the required number cannot be counted towards the RHNA progress. When analyzing the City's progress, it is important to acknowledge that the development of affordable housing, which requires public subsidies, has been challenging due to insufficient funding sources at the federal, state, and local levels.

Table 5-1. 2015-2023 RHNA Progress - Permitted Units

	Totals by Numbers of Units	Very Low (<=50% AMI)	Low-Income (51-80% AMI)	Moderate (81-120% AMI)	Above Moderate (>120% AMI)
2015-2023 RHNA	663	193	101	112	257
Units Permitted	461	41	70	36	314
Remaining RHNA	259	152	31	76	0

Note: *While the City exceeded the required number of above-moderate units, units beyond the required 257 cannot be counted against the remaining RHNA, given that it is not affordable to lower- and moderate-income households.*

Source: *City of Millbrae 2022 Annual Progress Report*

5.2 Housing Challenges, Opportunities, and Achievements

During the 5th Cycle Planning period, the City faced multiple challenges, found growth opportunities, and achieved many goals.

5.2.1 Challenges

5.2.1.1 Transit Environment

The City identified that the areas surrounding San Francisco International Airport are challenging for new housing developments due to the noise, traffic, parking, and height restrictions. In addition, the future integration of the High-Speed Rail could pose a potential threat to opportunity sites designated for the Millbrae Station.

5.2.1.2 Increasing Costs

Development costs are increasing at a rate higher than the City's housing funds can grow. In addition, advanced planning work proves to be expensive, adding another layer of difficulty in financing affordable housing development for lower-income units.

5.2.1.3 Community Concerns

There has been some community concern regarding new housing developments affecting the City's local character. This concern has resulted in slightly extended processing times for one development. However, a large majority of processing time is attributable to the need to obtain review comments from other departments, such as building, public works, and fire.

5.2.2 Opportunities

5.2.2.1 Accessory Dwelling Units

The City adopted a new Accessory Dwelling Unit (ADU) ordinance in response to changes in state law, resulting in a simplified process for ADU development in 2020. In 2020 and 2021, six and 18 ADUs were permitted, respectively. The low number of permit applications for ADU development could be a result of the high costs of construction, which offsets the incentives of building them. To address this, the City included Program HIP-18, Encourage and Incentivize Accessory Dwelling Units, Chapter 8, Housing Plan, of this Housing Element.

5.2.2.2 Affordable Housing and Funding

During the 5th Cycle, the City established inclusionary housing requirements. More specifically, the City adopted the Affordable Housing On-Site and In-Lieu Fee Requirements and Affordable Housing Commercial Linkage Impact Fees in 2021. The Affordable Housing On-Site program allows developers to build affordable units as part of a project or pay an in-lieu fee. The

Commercial Linkage Impact Fee requirement for commercial development (on a square foot basis) addresses the need for affordable housing generated by new non-residential development. Both programs are expected to generate additional affordable housing units in the City and provide funding for affordable housing development.

5.2.3 Accomplishments

5.2.3.1 Millbrae Station Area Specific Plan

The City adopted the Millbrae Station Area Specific Plan (MSASP) in 2016 to produce developments connected to transit. The MSASP zones for the development of 1,750 units, which would exceed the total number of units required by the current RHNA allocation. As of August 9, 2022, the City has entitled 888 units in the MSASP.

In addition to the MSASP, the City is in the process of approving the Downtown & El Camino Real Specific Plan (Specific Plan). The City released the Specific Plan for public review on June 16, 2022. The Specific Plan establishes a vision for the downtown district and the El Camino Real corridor, providing an overarching policy framework and design standards to achieve that vision. The purpose of the Specific Plan is to enhance the quality of life by providing a roadmap for future growth that emphasizes transit-oriented, mixed-use development that provides a mix of housing, restaurants, general commercial, hotels, offices, and entertainment uses. The Specific Plan is expected to be adopted by the end of the calendar year 2022.

5.2.3.2 Housing Quality

The City addressed housing quality issues by establishing the groundwork for better code enforcement. To improve the code enforcement process, the City updated its website to provide homeowners with better information on code requirements, as well as information on how to address any code enforcement issues that arise.

5.2.3.3 Affordable Housing

The City adopted a series of measures to ensure more affordable housing in Millbrae. Such measures included:

- **MSASP:** Continued to implement and amended the MSASP to allow more flexibility for land uses in the MSASP area.
    - The City approved the Gateway at Millbrae Station project, located at the Millbrae BART Station. The project will encourage Transit Oriented Development and bring 400 new rental homes to the City, including 100 affordable units. 79 of the affordable units will be veteran preferred.

  - The City also approved the Millbrae Serra Station Transit Oriented Development project, which includes 488 rental units, of which 15% (73 units) are affordable for Low and Moderate-Income households.

- **ADU Ordinance:** Incorporated new housing laws, community feedback objective design standards to facilitate the approval of ADUs in the City.
- **General Plan Update and Downtown and El Camino Real Specific Plan:** Initiated the process of updating the Millbrae General Plan and adopting its Specific Plan. Both the General Plan and Specific Plan were approved in December 2022 to provide developers with the tools to build more housing in the City.
- **Affordable Housing On-Site and In-Lieu Fee Requirements:** Amended the Millbrae Municipal Code in July 2021 to add these requirements. The amendment established requirements for the provision of inclusionary affordable housing at the rate of 15% on-site, affordable units for projects with ten (10) or more units.
- **Notice of Intent and Offer to Convey Surplus Property:** Provided to eligible agencies and affordable housing organizations in 2021, under the Surplus Land Act.
  - The City received four Notices of Interest from affordable housing organizations and conducted good-faith negotiations with them.

5.2.3.4 Above Moderate-Income Housing

As shown in Table 5-1, the City permitted 314 above moderate-income housing – 662 more units than the 257 RHNA allocation. There is greater demand for these projects due to their economic attractiveness in rent and sales prices.

Furthermore, the demand for above-moderate units will continue into the 6th Cycle Planning Period. As of August 2022, the City has 11 projects with a total of 1,400 above-moderate units in the pipeline and will likely continue to develop throughout the planning period.

5.2.3.5 Climate Change and Sustainability

The City adopted a climate action plan in 2020 with an initial budget of $1.3 million. The climate action plan focuses on promoting energy conservation through new REACH codes. The new local building codes are expected to exceed the minimum requirements provided by the State for energy usage, promoting clear air, climate solutions, and renewable energy. The codes include increased solar electric systems and expanding electric vehicle charging, among others.

5.2.3.6 Special Needs Housing

The City's programs addressed the housing needs of special needs populations during the 5th Cycle planning period. Special needs populations include seniors, people with disabilities

(including developmental disabilities), large families, and families with female heads of household. The City addressed the housing needs of special needs populations through the following programs:

- **Seniors:** The City continues to allocate funding for and refer individuals at the lowest income levels (including seniors, individuals living with disabilities, residents at risk of homelessness, and female heads of households) to the successful Human Investment Project Housing Home Sharing Program. Every year, Millbrae residents are successfully placed and housed through the program.

- **Large Families and Female-Headed Households:** The City continues to allocate funding for and refer individuals at the lowest income levels (including seniors, individuals living with disabilities, residents at risk of homelessness, and female heads of households) to the successful Human Investment Project Housing Home Sharing Program. Every year, Millbrae residents are successfully placed and housed through the program.

- **People with Disabilities:** The City continues to allocate funding for and refer individuals at the lowest income levels (including seniors, individuals living with disabilities, residents at risk of homelessness, and female heads of households) to the successful Human Investment Project Housing Home Sharing Program. Every year, Millbrae residents are successfully placed and housed through the program.

  The City also approved the development of the Gateway at Millbrae Station Apartments, a 400-unit development with 100 affordable units. The project includes 8 units for mobility, sight, and hearing-impaired residents.

  The City Council adopted Ordinance 748 in January 2015, which establishes specific written procedures for requesting and granting reasonable accommodation for housing for persons with disabilities, and procedures for City approval

  The City worked with the Golden Gate Regional Center to implement an outreach program that informs families about housing and services available for persons with developmental disabilities.

  The City also continued to have the Building Official as the City's Americans with Disabilities Act Coordinator to carry out the City's compliance with nondiscrimination requirements. Furthermore, the Coordinator continued to receive questions, concerns, complaints, and requests.

- **Families and Individuals in Need of Emergency Shelter:** The City continues to allocate funding for and refer individuals at the lowest income levels (including seniors, individuals living with disabilities, residents at risk of homelessness, and female heads of

households) to the successful Human Investment Project Housing Home Sharing Program. Every year, Millbrae residents are successfully placed and housed through the program.

The City Council approved funding for a pilot program with the San Mateo County Human Services Agency to provide Homeless Outreach Services at the Millbrae BART Station and surrounding areas. The Human Services Agency will retain homeless outreach and service provider LifeMoves for one year to provide two full-time equivalent social workers/case managers.

5.3 Housing Element Policies and Programs

The City adopted a series of programs to accomplish the housing goals of the 5th Cycle Housing Element. Table 5-2, 5th Cycle Program Accomplishments, and Table 5-3, Progress in Achieving Quantified Objectives 2015–2023, provide an analysis of the progress and effectiveness of each program and reviews the appropriateness of the program to determine if it should be continued, modified, or removed from the 6th Cycle Housing Element.

Table 5-2. 5th Cycle Program Accomplishments

Program Name & Description	Responsible Agency	Timeline	Progress and Continued Appropriateness	Recommendation
GOAL H1 – REINFORCE THE CITY'S COMMITMENT TO MEETING HOUSING NEEDS				
HIP-1. Future Housing Element Updates The City will update its Housing Element consistent with State Law requirements.	Community Development Department	Next update by 2023	The City plans to complete its 6th Cycle Housing Element in 2023. This program is in progress.	Reporting Requirement - Remove
HIP-2. Coordination with Non-Profits The City will meet with affordable housing providers and representatives as needed. The City will actively partner with these groups to ensure affordable housing can be built in Millbrae. The City will listen to the suggestions of these groups and if possible and appropriate will accommodate their needs. The Community Development Director will act as a liaison role to housing groups.	Community Development Department	Annual	The City will continue to meet with affordable housing providers to ensure we gain an understanding of affordable housing concerns, suggestions, and how affordable housing can be built in Millbrae.	Retain and Modify

Program Name & Description	Responsible Agency	Timeline	Progress and Continued Appropriateness	Recommendation
HIP-3. Annual Housing Element Reporting The City will complete the annual Housing Element Progress Report. It will provide a statistical summary of residential building activity tied to various types of housing, household need, income, and Housing Element program targets.	Community Development Department	Annual	The City continues to prepare Housing Element Reporting in the Annual Progress Reports.	Retain and Modify
HIP-4. Community Outreach The City will improve citizen awareness of rehabilitation and disaster assistance loan subsidy programs, code enforcement, energy conservation programs, fair housing laws, and affordable housing programs by: **a.** Providing pamphlets on the programs at City Hall, the library, and with water bill inserts; **b.** Contacting neighborhood groups and associations; **c.** Providing special presentations to community groups periodically; and **d.** Providing public information through articles in the local newspaper and with cable	Community Development Department	Ongoing	The City partners with local nonprofits to offer First Time Homebuyer workshops, ADU education outreach meetings, and home-sharing programs. City also disseminates flyers and brochures on various programs and regularly attends community meetings to share information. Due to the COVID-19 pandemic, the City relied much more on written communications via social media, with Spanish and Chinese translations for members of the community. In the area of code enforcement, the City disseminated new public information on the City website and City newsletter including an article focused on a 'did you know' covering multiple code enforcement and community preservation regulations. The Code Enforcement staff also provided an informational update to the City Council on September 28, 2021.	Retain and Modify

Program Name & Description	Responsible Agency	Timeline	Progress and Continued Appropriateness	Recommendation
TV public service announcements.				
HIP-5. Non-Discrimination Increase public awareness through handouts of anti-discrimination laws and policies and of recourse available in case of violation. To ensure that the sale, rental, or financing of housing is not denied to any individual based on race, sex, national origin, religion, age, or other arbitrary factors, Millbrae will help ensure that state and federal laws are adhered to regarding fair housing. The City, through its Community Development Department, will refer discrimination complaints to the appropriate legal service, County, or State agency. The City will assist local non-profit organizations, as appropriate, to provide public information and education services.	Community Development Department	Ongoing	The City has referred discrimination complaints to the appropriate local legal service. The City has updated its website to provide a comprehensive list of local non-profit organizations, as appropriate, to provide public information and education services on these services.	Retain and Modify

Program Name & Description	Responsible Agency	Timeline	Progress and Continued Appropriateness	Recommendation
Goal H2 – PROTECT AND ENHANCE EXISTING HOUSING, COMMUNITY CHARACTER, AND RESOURCES				
HIP-6. Continue to Improve Code Enforcement Continue the City's existing code enforcement program and consider expansion of the program to assure compliance with basic health and safety building standards and appropriate permits, potentially including: 1. resale inspections of single-family homes; and 2. public outreach and education. In addition, continue the mandatory fire code inspection program.	• Community Development Department • Fire Marshall	Ongoing	The City has expanded its website information to include clear contact information for Code Enforcement staff. The City also updated its Notice of Violation and Notice of Administrative Citation forms to improve readability and accuracy. The City also updated and posted the form to appeal an Administrative Citation online and request a hearing and an advance deposit hardship waiver. Finally, the City Council adopted amendments to the City's municipal code related to code enforcement actions for greater accuracy and enforceability, including Sections 1.05.020 and 1.05.030 of Chapter 1.05 Penalty Provisions and Section 6.25.070 of Chapter 6.25 Community Preservation of the Millbrae Municipal Code related to code citations and nuisance abatement notices.	Retain and Modify
HIP-7. Encourage Rehabilitation Loans The City will encourage energy conservation, rehabilitation loan, and disaster assistance programs to the extent possible given program funding criteria and local needs. The City will facilitate greater participation in the program by advertising on the city website, in city mailings, and by providing information at the Building Department counter.	• San Mateo Housing Authority • San Mateo County Department of Housing • Community Development Department	Ongoing	The City provides information on local housing resources on the website, and through handouts at the Building Division.	Retain and Modify

Program Name & Description	Responsible Agency	Timeline	Progress and Continued Appropriateness	Recommendation
HIP-8. Contact Property Owners of Substandard Units Within current staffing limits, establish a program of contacting owners of structures that appear to be in declining or substandard condition, offer inspection services, advertise, and promote programs that will assist in funding needed work.	• Community Development Department	Ongoing	Program initiated and multiple properties assisted, often involving Sheriff's Office – P.E.R.T & Patrol; South San Francisco Scavenger; the City of Millbrae Public Works as well as the Code Enforcement division of the Community Development Department	Retain and Modify
HIP-9. Energy Conservation Assistance Publicize energy conservation programs and weatherization services that are available to provide subsidized or inspection and improvement. The City can help publicize programs such as those offered by PG&E.	• PG&E • North Peninsula Neighborhood Service Center • San Mateo County Department of Housing • Community Development Department	Annual	Updated the City webpage with energy conservation programs that provide financial assistance to homeowners to install energy conservation measures, or solar.	Retain and Modify
HIP-10. Increased Energy Conservation Apply Title 24 energy conservation requirements, and, where possible, require the structural design to make use of natural heating and cooling and require the landscape design to be drought tolerant.	Community Development Department	Ongoing	The 2019 Building Energy Efficiency Standards, which went into effect in January 2020, require all new residential construction and major remodels to be built to a zero-net energy standard. Along with new efficiency requirements, as of January 2020, all new residential construction statewide must include rooftop solar photovoltaic systems sized to offset simulated on-site electricity use. In addition, the City prepared and adopted new	Retail and Modify

Program Name & Description	Responsible Agency	Timeline	Progress and Continued Appropriateness	Recommendation
			REACH codes in 2020. These new codes provide for increased energy efficiency, the use of renewable energy sources, and electric vehicle charging station expansion. The City continues to implement the State Title 24 energy conservation requirements, along with the local reach code requirements. Other measures the City has undertaken in the 2020 year include: Expediting the plan review process for Solar Systems by redlining plans and educating PV designers, thus resulting in more solar panels installation in Millbrae; Requiring LED Light Fixtures for simple bathroom and kitchen remodeling; and Enforcing plumbing fixtures that are approved and rated for water conservation for simple kitchen and bathroom remodeling which results in water conservation and using less electricity in delivering domestic water.	
HIP-11. Rental Housing Assistance Encourage landlords, tenants, and developers to participate in the Housing Authority Section 8 Rent Subsidy Program. Maintain descriptions of current programs and contacts at City Hall to provide to interested persons.	• San Mateo County Housing Authority • Community Development Department	Develop in 2018; Ongoing	In 2020 calls and walk-ins from individuals seeking housing assistance have increased by a factor of approximately 50%. Staff screens them for need and then forwards them to one of several resources, such as County Housing Authority, County Housing Department, HIP Housing for home sharing, Project Sentinel for Housing disputes, and Samaritan House for homeless caseworker services. In addition, there have been a substantial number of COVID-19-related inquiries regarding concerns over residential eviction. Furthermore, the City provides an updated list of local housing resources on its website.	Retain and Modify

Program Name & Description	Responsible Agency	Timeline	Progress and Continued Appropriateness	Recommendation
HIP-12. Condominium Conversion Regulation Continue the existing controls on conversions of rental units to condominiums.	Community Development Department	Ongoing	The City has not received any applications for condominium conversion during the reporting period.	Remove
HIP-13. Neighborhood Conservation Continue the maintenance and enhancement of public facilities, such as streets, water supply, and drainage, in residential neighborhoods by allocations from the general fund, gas tax revenues, Block Grant funds, and, where appropriate, through assessment districts, or as conditions of development.	• Public Works Department • Community Development Department	Ongoing	The City has continued to implement the adopted Capital Improvement Program including improvements to public facilities. Specifically, the City replaced more than a mile of sanitary sewer pipeline and paved a principal arterial, Larkspur Drive from Skyline to Helen. The City also completed a recycled water feasibility study. The recycled water project will address long-term regional water reliability issues and provide an alternative source of water supply considering the many anticipated high-density development projects envisioned in the MSASP.	Remove
HIP-14. Home-Sharing Continue to support Human Investment Project Housing Home Sharing Program as part of a collection of policies, programs, and practices for addressing the housing needs of those at the lowest income levels including seniors, those living with disabilities, those at risk of homelessness, and female heads of households.	Human Investment Project	Ongoing	The City continues to allocate funding for and refer individuals and homeowners to the successful Human Investment Project Housing Home Sharing Program. Every year, members of our community are successfully placed and housed through the program.	Retain and Modify

Program Name & Description	Responsible Agency	Timeline	Progress and Continued Appropriateness	Recommendation
GOAL H3: PROVIDE NEW HOUSING AND ADDRESS AFFORDABLE HOUSING AND OTHER SPECIAL NEEDS				
HIP-15. Continue to Implement the MSASP The City will continue to implement the specific plan for the Millbrae BART/Caltrain Station Area, which identifies potential housing sites. In the Station Area, three sites are particularly well-suited for housing and have a strong potential of developing housing soon. The City will encourage developers to submit applications that meet the objectives and development policies of the Specific Plan. As development applications are received, the City will continue to apply development standards and incentives as described in the Specific Plan. The City expects to achieve the entitlement of at least 600 new dwelling units by 2023 with 15% of those being affordable.	Community Development Department	Ongoing	Construction has continued on The Gateway at Millbrae Station development project in the MSASP Area. This project includes 400 new housing units, of which 100 are affordable at income levels ranging from very low to moderate. Construction on the buildings started in 2020 and is expected to be completed by end of 2022. The City of Millbrae amended the MSASP to allow more flexibility in terms of uses in the plan area, see below The City has approved planning approvals for an additional 488 units at the Millbrae Serra Station TOD project of which 15% (up to 73 units) are affordable at various levels (10% low and 5% moderate).	Retain and Modify
HIP-16. Complete Update to Specific Plan The City is currently updating the Millbrae Station Area Specific Plan, with completion expected in 2015.	Community Development Department	Fiscal Year 2015-16	The City of Millbrae amended the MSASP to allow more flexibility in terms of uses in the plan area, specifically in the portion south of Millbrae Avenue, east of the train tracks.	Remove

Program Name & Description	Responsible Agency	Timeline	Progress and Continued Appropriateness	Recommendation
HIP-17. Adopt Requirements for Second Units. Consistent with State legislation for second units (AB 1866), the City shall amend the Zoning Ordinance to allow second units under controlled conditions, such as maximum floor area and/or lot coverage, sufficient parking, owner-occupancy of one unit, and neighborhood compatibility.	• Planning Commission • City Council • Community Development Department	Develop by 2015	The City adopted a new ADU ordinance in 2020 taking into account the community feedback received at various prior workshops, as well as new laws pertaining to ADUs. As part of the Ordinance, the City adopted objective design standards for ADUs. The City has continued to disseminate information about the new regulations to the community, including at public workshops for homeowners and on the website.	Retain and Modify
HIP-18. Housing Opportunity Areas Encourage housing development of a higher density that maximizes production of very low-income units, consistent with environmental constraints, surrounding development patterns, and design excellence (architecture, site planning, amenities, etc.). City will continue to offer incentives such as reduced parking requirements and fast-track project review, along with cost reduction methods.	Community Development Department	Ongoing	The City's General Plan Update and Downtown and El Camino Real Specific Plan preparation are currently in progress. The estimated completion date is late 2022. The City continues to process several higher-density housing developments in the Housing Opportunity Area at various stages in the planning process, including projects with parking reductions consistent with State Density Bonus Law and SB 35 legislation. In addition, staff has evaluated areas of the city that could potentially accommodate new housing units as part of the housing element update. The City of Millbrae is working with 21 Elements on this effort.	Retain and Modify

Program Name & Description	Responsible Agency	Timeline	Progress and Continued Appropriateness	Recommendation
HIP-19. Home Ownership Mortgage Subsidy Programs San Mateo County offers Below Market Rate (BMR) home mortgages to qualified first-time home buyers for purchasing units built by developers who participate in the program. Millbrae will encourage developers to participate in this program and will then publicize these projects and the Mortgage Subsidy Program through the City's communication channels, including handouts, the City newsletter, and the City website.	• San Mateo County Department of Housing and Community Development • HEART • Community Development Department	Ongoing	Several BMR units have utilized this program in the past. City staff continues to work with developers of condominium units. The City has not received condominium development proposals with the intent to sell the units soon after the certificate of occupancy. Two development projects proposed condominium maps for the residential units: 959 El Camino Real and 130-140 El Camino Real. The developers of both projects have expressed intent to rent the condominium units. Staff will continue to work with developers on homeownership mortgage subsidy programs.	Retain and Modify
HIP-20. BMR Resale and Rental Controls Implement resale and rental regulations for low- and moderate-income units and assure that these units remain at an affordable price level.	• City Council • Community Development Department • BAAHA	Ongoing	City staff continues to successfully work with sellers and buyers of BMR units to ensure the preservation of the affordability covenants and restrictions when any transfers occur. In the calendar year 2020, the City assisted in 3 BMR transactions, successfully preserving all affordability covenants and restrictions. To date, the City has successfully preserved all affordability covenants and restrictions and found new qualifying buyers and renters for eligible BMR units. BAAHA is a consultant who manages for-sale units.	Retain and Modify
HIP-21. BMR Eligibility Guidelines Consider targeting affordable housing for current City employees, school district employees, and other people	Community Development Department	Ongoing	The City has a lottery system for BMR units with preference points given to those working or living in Millbrae.	Retain and Modify

Program Name & Description	Responsible Agency	Timeline	Progress and Continued Appropriateness	Recommendation
working in the City of Millbrae. Ensure that preferences are consistent with fair housing law.	BAAHA			
HIP-22. Homelessness Assistance Participate and allocate funds, as appropriate and as funding is available, for County and non-profit programs providing homeless shelter (i.e., emergency housing) and related counseling services. Review proposals for emergency shelter uses based on the policies in the General Plan and other City development standards and requirements. Continue to permit homeless shelters in the Industrial Zone and continue to treat transitional and supportive housing as a residential use subject to only those restrictions that apply to other residential dwellings of the same type in the same zone. Continue to allow houses of worship to operate small emergency shelter facilities as an ancillary use, for limited periods.	• City Council • Community Development Department	Ongoing	In September 2021, the City Council approved funding for a pilot program with the San Mateo County Human Services Agency to provide Homeless Outreach Services at the Millbrae BART Station and Surrounding Areas. HSA will retain homeless outreach and service provider LifeMoves for one (1) year to provide two (2) full-time equivalent social workers/case managers. The social worker/case managers will spend some time at the BART Station area and accept referrals from City/SMSO personnel of individuals in need of outreach services. These services include outreach, engagement, and case management services to people who may be experiencing unsheltered homelessness, mental health issues, and addiction with a focus on evening/nighttime hours to coincide with the arrival of the last BART train.	Retain and Modify

Program Name & Description	Responsible Agency	Timeline	Progress and Continued Appropriateness	Recommendation
HIP-23. Adaptable Units for the Disabled. The City will encourage universal design and ensure that new housing includes units that can be adapted for use by disabled residents. Ensure that relevant laws are followed, including the California Fair Employment and Housing Act.	Community Development Department	Ongoing	The City approved the development of Gateway at Millbrae Station Apartments, a 400-unit development with 100 affordable units. The development has 8 units for mobility, sight, and hearing impaired.	Retain and Modify
HIP-24. Maintain an Americans with Disabilities Act (ADA) Coordinator and Provide Information on Reasonable Accommodation Continue to have the Building Official as the City's ADA Coordinator to coordinate and carry out the City's compliance with the nondiscrimination requirements of Title IIA of the ADA. Direct questions, concerns, complaints, and requests regarding accessibility for people with disabilities to the City's ADA Coordinator. Provide information to the public regarding reasonable accommodations related to zoning, permit processing, and building codes on the City's website and in City handouts.	Community Development Department	Ongoing, updates based on legal changes	The Building Division continues to provide information on ADA access requirements to applicants during the development review process and at the front counter.	Remove

Program Name & Description	Responsible Agency	Timeline	Progress and Continued Appropriateness	Recommendation
HIP-25. Raise awareness of recently adopted Grand Boulevard Planned Development Zone Raise awareness about and encourage implementation of this zoning district to achieve higher density mixed-use redevelopment along the City's El Camino Real corridor by highlighting it on the City's website, creating an informational flier for distribution at City Hall, and promoting it in conjunction with the City's efforts to prepare and adopt a plan for the corridor as a Priority Development Area.	• City Council • Planning Commission • Community Development Department	Ongoing	The Grand Boulevard Initiative has been replaced with the Downtown and El Camino Real Specific Plan.	Remove
HIP-26. Encourage Innovative Housing Approaches. Encourage cooperative and joint ventures between owners, developers, and non-profit groups in the development of BMR housing. Assist in identifying financing sources for housing projects.	Community Development Department	Ongoing	The Gateway and Millbrae Station project included the construction of an 80-unit BMR housing project; this project was completed in the summer of 2022. Additionally, that project included a 320-unit residential building with 20 BMR units; this project is slated for completion in fall 2022.	Retain and Modify
HIP-27. Housing Developer Outreach Distribute informational materials on housing programs to local non-profit and private	Community Development Department	Annual	The City is in the final stages of creating a Downtown and El Camino Real Specific Plan. This plan will create new housing opportunities for both affordable and market-rate developers. The plan doubles the maximum height allowed and permits densities of up to 130 dwelling units/acre.	Retain and Modify

Program Name & Description	Responsible Agency	Timeline	Progress and Continued Appropriateness	Recommendation
developers. Provide information on: 1. newly adopted development standards for mixed-use and planned development districts; 2. incentives for the development of deed-restricted and market-rate affordable housing; and 3. appropriate areas for high-density housing.				
HIP-28. Encourage Special Needs Housing Encourage non-profit developers to target housing projects for identified special needs groups in Millbrae, including seniors, families with children, single parents, young families, lower-income households with extremely low income, and the disabled. Encourage housing developers to design units that meet the requirements of these special needs groups, such as rental units, accessibility features for the disabled and the elderly, additional bedrooms for large families, playgrounds, and on-site daycare facilities for families with children.	• City Council • Planning Commission • Community Development Department	Ongoing, annual review	The City will encourage non-profit developers to target special needs groups. The City shall adopt a formal policy for expedited review and permitting of affordable housing development for special needs populations.	Retain and Modify

Program Name & Description	Responsible Agency	Timeline	Progress and Continued Appropriateness	Recommendation
HIP-29. Inclusionary Housing and/or Impact Fee Requirements. To the extent consistent with applicable law, adopt an inclusionary housing ordinance and/or affordable housing impact fee ordinance that requires developers to provide BMR housing or pay a fee. For units produced by developers, the City will require units to remain affordable for at least 55 years. Alternatively, the city may adopt an impact fee ordinance to mitigate the effects of new development by requiring developers to contribute to an affordable housing trust fund.	• City Council • Planning Commission • Community Development Department	Ongoing	In July 2021, the City Council adopted amendments to the Millbrae Municipal Code Title 10 to add the Millbrae Affordable Housing On-Site and In-Lieu Fee Requirements and adopted 1) a Resolution Adopting Affordable Housing Requirements and Program Regulations and 2) a Resolution Establishing Affordable Housing In-Lieu Fees for Residential Development Projects and Commercial Linkage Impact Fees for Commercial Development Projects. The purpose of the Ordinance is to establish requirements for the provision of inclusionary affordable housing at the rate of 15% on-site, designated as deed restricted for very low-, low-, and moderate-income households in conjunction with new development projects that include ten or more new units in the City of Millbrae. This Ordinance also establishes the requirement for an affordable housing in-lieu fee on residential development projects consisting of four (4) to nine (9) units, or when the calculation of the inclusionary units in development projects of ten (10) or more units results in a fractional unit of less than 0.5. The fee is to be contributed to the City's Affordable Housing Fund and used to fund the development of affordable housing and related programs in Millbrae.	Remove

Program Name & Description	Responsible Agency	Timeline	Progress and Continued Appropriateness	Recommendation
HIP-30. Lot Consolidation within the MSASP Consistent with the goals and policies of the MSASP, the City will encourage lot consolidation among property owners of lots within Sites 1, 4, 11, and 12 of the MSASP. The City will identify owners and distribute information to them regarding development potential, development standards, affordable housing incentives and density bonuses, and the development review and approval process.	• City Council • Planning Commission • Community Development Department	Ongoing	Still in progress	Retain and Modify
HIP-31. Parking Requirements in Downtown Area Payment of an in-lieu parking fee will continue to be an option for developers. In-lieu parking fees will be used to build a parking garage or will be spent on other measures to manage the parking need.	• City Council • Planning Commission • Community Development Department	Ongoing	Still in progress	Retain and Modify
HIP-32. Affordable Housing Development on City-Owned and Other Agency-Owned Land The City will investigate opportunities for affordable housing on City-owned and other agency-owned lands in Millbrae,	Community Development Department	Ongoing, annual review	The City provided a Notice of Intent and Offer to Convey Surplus Property to eligible agencies and affordable housing organizations under the provisions of Government Code Section 54222 (Surplus Lands Act) on August 24, 2021. The City received four Notices of Interest from affordable	Retain and Modify

Program Name & Description	Responsible Agency	Timeline	Progress and Continued Appropriateness	Recommendation
including the following actions to promote the development of affordable housing on two City-owned parking lots on Magnolia Avenue and El Camino Real: 1. Utilize flexible zoning standards that facilitate the development of the maximum number of affordable units. Require no more than one uncovered, off-street parking space per unit and consider off-site parking in fulfillment of the parking requirement. 2. Seek partnerships with non-profit organizations to develop and maintain the units. 3. Provide financing from funds raised through the City's in-lieu affordable housing fees. 4. Seek additional funding through state and federal programs, community foundations, and local housing trust funds. 5. Maintain the units as affordable rental housing for moderate, low- and very low/extremely low-income households, utilizing income eligibility requirements and affordability standards as			housing organizations and has conducted good-faith negotiations with them.	

Program Name & Description	Responsible Agency	Timeline	Progress and Continued Appropriateness	Recommendation
published annually by HCD. Encourage affordability requirements that will enable the City to meet its regional housing needs.				
HIP-33. Commercial Linkage Fee Study Study the possibility of adopting a commercial linkage fee to help fund affordable housing. The fee should be set low enough to not discourage new development.	Community Development Department	Fiscal Year 2015-16	In July 2021, the City Council adopted amendments to the Millbrae Municipal Code Title 10 to add the Affordable Housing Commercial Linkage Impact Fee Zoning Ordinance and adopted a Resolution Establishing Commercial Linkage Impact Fees for Commercial Development Projects. This creates a fiscal mechanism to meet the demand for additional affordable housing created by new commercial development. At the time of adoption, these fees were set at $3,868.00 per hotel room; $5.80 per gross square foot for Retail Sales, Eating and Drinking, Entertainment, Personal Services, Pet-Related Services, Vehicle Related; and $12.86 per gross square foot for offices.	Remove
HIP-34. Definition of Family Continue to use a definition of family for the zoning code that does not discriminate. A definition of family was added to the zoning code in 2014.	Community Development Department	Ongoing	Complete. Ongoing implementation.	Remove
HIP-35. Reasonable Accommodations for People with Disabilities. Implement the newly adopted Reasonable Accommodation policy. Ensure that planners and	Community Development Department	Ongoing	Ongoing implementation	Retain and Modify

Program Name & Description	Responsible Agency	Timeline	Progress and Continued Appropriateness	Recommendation
the general public know about the policy.				
HIP-36. Density Bonus Adopt a local ordinance, consistent with state law, offering a greater density bonus than allowed by the default state standards. Continue applying the state density bonus standards until a local law is passed.	Community Development Department	2015	The City has applied density bonus provisions consistent with State law. The following projects have approved density bonuses as well as development concessions/incentives/waivers: 1100 El Camino Real, 959 El Camino Real, Gateway at Millbrae Station, and Millbrae Serra Station. The following projects under review include density bonuses and concessions/incentives/waivers: 1301 Broadway, 130-140 El Camino Real	Retain and Modify
HIP-37. Anti-Displacement Measures Evaluate the potential displacement of existing lower-income residents and adopt measures, as appropriate, to address the risk of displacement of existing residents. Coordinate with other jurisdictions if possible. 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. The city will implement programs as appropriate to address displacement. The city will monitor such programs annually for effectiveness and make adjustments, as necessary.	Community Development Department	Fiscal Year 2016-2017	The City has anti-displacement measures for condominium conversions but has not received an application for condominium conversion during the period.	Retain and Modify

Program Name & Description	Responsible Agency	Timeline	Progress and Continued Appropriateness	Recommendation
HIP-38. Airport development restrictions. Coordinate with C/CAG's Airport Land Use Commission to ensure that all zoning changes comply with the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport.	Community Development Department	Ongoing	City has coordinated with C/CAG's Airport Land Use Commission on the City's Specific Plan and General Plan Update. The City has received input and incorporated comments.	Retain and Modify
HIP-39. Outreach to People With Developmental Disabilities Work with the Golden Gate regional center to implement an outreach program that informs families within the City on housing and services available for persons with developmental disabilities. The program could include the development of an informational brochure, including information on services on the City's website, and providing housing-related training for individuals/families through workshops.	Community Development Department	Fiscal Year 2016-17	Ongoing. Improve on the program during the 6th Cycle.	Retain and Modify
HIP-40. Employee Housing. Ensure that the City is in compliance with State Health and Safety Code Sections 17021.5, which concerns employee housing that serves six or fewer employees.	Planning Department	Fiscal Year 2018-19	Ongoing. Improve on the program during the 6th Cycle.	Retain and Modify

Table 5-3. Progress in Achieving Quantified Objectives 2015–2023

Quantified Objectives						Progress					
Program Types	Extremely Low	Very Low	Low	Moderate	Above Moderate	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
New Construction (Including Issued Permits)	20	36	47	61	518	-	41	70	36	314	461
Rehabilitation	5	5	0	0	0	-	-	-	-	-	-
Conservation and Preservation	0	10	5	1	0	-	-	-	-	-	-
Total	**25**	**51**	**52**	**62**	**518**	**-**	**41**	**70**	**36**	**314**	**461**

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6 AT-RISK AFFORDABLE HOUSING

Pursuant to California Government Code, Section 65583(a)(9), an analysis of existing assisted housing developments that are eligible to change from low-income housing uses during the next 10 years due to termination of subsidy contracts, mortgage prepayment, or expiration of restrictions on use must be identified in the Housing Element.

There are no affordable housing units at risk of reverting to market rate during the 6th Cycle Housing Element Planning Period.

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7 ADEQUATE SITE INVENTORY ANALYSIS AND METHODOLOGY

California Government Code, Section 65583(a)(3), requires the Housing Element to identify sites suitable for the development of all housing types, with the capacity to satisfy the City of Millbrae's (City or Millbrae) housing needs for the current 2023–2031 6th Cycle Housing Element period. The Site Inventory is an assessment of the City's capacity for new housing development, which must demonstrate that the Regional Housing Needs Assessment (RHNA) target of 2,199 housing units, including 906 lower-income (extremely low-, very low-, and low-income) affordable units, can reasonably be achieved under the City's current land use plans and zoning regulations, or with planned amendments thereto.

The Site Inventory prepared for the 2023–2031 Planning Period demonstrates a capacity for at least 3,830 housing units, including 1,062 housing units on sites adequate for lower-income housing. Pursuant to California Government Code, Section 65583.1, this capacity includes:

- A credit of 1,813 units (including 293 lower-income units) toward the RHNA consisting of:
  - 1,701 units from entitled or proposed projects (225 lower-income units); and
  - 112 units from Accessory Dwelling Unit (ADU) potential (68 lower-income units).

The Site Inventory was prepared to satisfy California (California or State) requirements (as detailed later in this chapter) and is a planning estimate based on several factors including market demand, recent development patterns, property owner interest, and other factors. However, the Site Inventory does not approve any project or guarantee what will be built on the site. Actual housing development is implemented by the development community and will be largely dependent on market factors that are outside of the City's control. Housing developers, market trends, and availability of funding are among the constraints that will dictate if and when housing units will be constructed.

Concerning the development of affordable housing, which requires public subsidies to be financially feasible, *California Government Code, Section 65583(b)(2), State law recognizes that housing needs may (and do) exceed available resources*. Acknowledgment of funding limitations is extremely important—cities and counties are required to prepare Housing Elements every eight years to identify needs and actions to provide for housing at all income levels and for all populations despite a severe shortage in local, state, and federal funding that makes many of the actions needed and planned financially infeasible. It is important

to recognize that state law requires cities to plan for housing, but almost all housing is developed by the private sector.

The capacity documented in this Chapter is achieved through various methods in accordance with state law, including the following:

- Developable sites pursuant to California Government Code, Section 65583.2(a), were identified. These included sites with zoning that currently allow residential uses. Vacant land was prioritized in the identification of sites. The City identified two vacant sites that are viable for development. The majority of land in the City is largely developed.
- Non-vacant sites that have a high likelihood of being redeveloped for residential uses during the 6th Cycle Housing Element Planning Period were identified.
- Sites to accommodate low and very low-income housing were identified and a residential development capacity analysis for all sites under California Government Code, Section 65583.2(c), was performed.
- Finally, alternative means of meeting the RHNA, as allowed by State law, were considered to meet the RHNA, including entitled or pending units and potential for ADUs.

A complete analysis of the Site Inventory follows. The Site Inventory is included as Appendix C and satisfies state requirements to identify units by parcel; This identification is for the Housing Element. Parcels may be modified, further subdivided, or otherwise amended in the future.

7.1 Summary of Sites Capacity

Table 7-1, Summary of Sites Capacity, includes a summary of the detailed inventory of vacant and underutilized parcels in the City's Site Inventory, Appendix C. Each identified site is adjacent to developed land and/or is the subject of a proposed housing development. Based on the review of the documentation outlined later in this chapter, each site has a sufficient utility supply available and is accessible to support housing development.

Table 7-1. Summary of Sites Capacity

Existing[1]		Previous[1]		# of Sites	Total Area (ac)	Net Units	Units		
Zoning	Max Density	Zoning	Max Density				Lower	Mod.	Above Mod.
Vacant				**2**	**0.20**	**2**	**0**	**0**	**2**
Single Family Residential (R-1)	9	Same as Proposed	9	2	0.20	2	0	0	2
Non-Vacant				**24**	**36.81**	**3,716**	**994**	**412**	**2,310**
Commercial (C)	N/A	Same as Proposed	N/A	1	0.67	99	49	0	50
Corridor Mixed Use (CMU)	130	Commercial (C)	N/A	8	12.92	1,271	420	0	851
Corridor Mixed Use (CMU)	130	Planned Development (PD)	N/A	2	7.83	868	295	0	573
Downtown Mixed Use (DMU)	50	Downtown Improvement Area (DIA)	N/A	1	0.05	5	0	0	5
Residential Mixed Use (RMU)	80	Commercial (C)	N/A	3	2.26	169	0	169	0
Residential Mixed Use (RMU)	80	Planned Development (PD)	N/A	2	4.22	320	99	133	88
Residential Mixed Use (RMU)	60	Same as Proposed	60	2	1.18	66	0	66	0
Single Family Residential (R-1)	9	Same as Proposed	9	1	0.63	1	0	0	1
Transit Oriented Development (TOD)	80	Same as Proposed	80	4	7.05	917	131	44	742
ADU Potential						**112**	**68**	**33**	**11**
TOTAL				**26**	**37.02**	**3,830**	**1,062**	**445**	**2,323**

[1] The City adopted the Downtown and El Camino Real Specific Plan (DECRSP) as part of the 2040 General Plan in December 2022. The DECRSP rezoned parcels within its specific plan area to allow for increased densities. The City is using the existing zoning and densities for purposes of this analysis and showing the previous zoning for background, as allowed by HCD during a meeting with staff on July 29, 2022. See Section 7.3.4.2 of this Sites Inventory chapter for more information.

Source: *City of Millbrae.*

7.2 Capacity Determination

Table 7-2, Capacity Determination, summarizes the **City's determination that there is sufficient capacity to accommodate the City's RHNA by income and categorizes credits and sites by zoning, representing land suitable and available for residential development,**

as defined in California Government Code, Sections 65583.1 and 65583.2(a). A description of the methodology used to determine the capacity of sites is presented later in this Chapter.

It is important to note that all lower-income sites in the Site Inventory have zoning that allows for residential use at densities that exceed State legal requirements for lower-income sites (i.e., 30 units per acre) or have an approved plan to develop lower-income housing (i.e., Site 2).

Table 7-2. Capacity Determination

	Units by Income Level				
	VLI	LI	Mod.	Above Mod.	Total
RHNA	**575**	**331**	**361**	**932**	**2,199**
Alternative Methods to Meet the RHNA (Credits)					
Entitled or Proposed Projects	69	156	44	1,432	1,701
Accessory Dwelling Unit Potential	34	34	33	11	112
Subtotal	**103**	**190**	**77**	**1,443**	**1,813**
Net RHNA (after credits are applied)	**472**	**141**	**284**	**(511)**	**386**
Step #1 Determination of Opportunity Sites (Existing Zoning)[1]					
Corridor Mixed Use (CMU)	508	162	0	792	1,462
Residential Mixed Use (RMU)	61	38	368	88	555
Step #1 Subtotal	**569**	**200**	**368**	**880**	**2,017**
Total (Credits & Step #1)	**672**	**390**	**445**	**2,323**	**3,830**
Surplus/(Shortfall)	**97**	**59**	**84**	**1,391**	**1,631**
No Net Loss Buffer Surplus/(Shortfall), as a percent of RHNA[2]	**17%**	**18%**	**23%**	**-**	**-**

[1] The determination of opportunity sites utilizes the existing zoning and densities of the Downtown and El Camino Real Specific Plan (DECRSP), which the City adopted in December 2022. HCD allowed the utilization of the existing zoning and densities during a meeting with staff on July 29, 2022.

[2] HCD recommends a 15-30% buffer for lower-income (very low and low) sites to protect the City from the No Net Loss provision. The City included a buffer for the moderate-income level for the same reason. The City calculated its buffer as a percentage of the gross RHNA (Before any credits were applied).

Source: *City of Millbrae.*

7.3 Identification of Developable Sites

7.3.1 Legal Requirements and State Housing Policies

State law requires that a housing element of a general plan must include an inventory of land suitable and available for residential development to meet the locality's share of the regional housing need by income level and demonstrate sufficient zoned housing capacity to meet each Housing Element Cycle's RHNA target. The City determines its housing capacity through a review of planned development and vacant and non-vacant developable land throughout the City that may reasonably develop within the Housing Element Planning Period. This approach

(as recommended by HCD) is utilized because many factors will affect housing development, including feasibility, trends, and developer and property owner choices within the City. Additionally, mandating housing development on private property or property owned by other government agencies is not within the City's authority or powers.

Per California Government Code, Section 65583.2(a), the City identified the following types of sites as land suitable for residential development:

- Vacant sites zoned for residential use.
- Vacant sites zoned for mixed-use, including residential.
- Residential and mixed-use zoned sites that are capable of being developed at a higher residential density than the current density (nonvacant sites, including underutilized sites).

HCD provides legal guidance on the selection of sites for Housing Elements in the Housing Element Site Inventory Guidebook (2020).

In addition to the legal requirements for appropriate sites shown above, ***California's Housing Future: Challenges and Opportunities Final Statewide Housing Assessment 2025 (2025 Assessment)***, prepared by HCD emphasizes throughout the document that the location of housing (including affordable housing) near transit and job centers as an important policy and implementation strategy. Excerpts that highlight this point are provided below along with page number references.

- "Land use policies and planning can help encourage greater supply and affordability as well as influence the type and location of housing. Thoughtful land use policies and planning can translate into the ability for families to **access neighborhoods of opportunity, with high-performing schools, greater availability of jobs that afford entry to the middle class, and convenient access to transit and services.** Easy access to jobs and amenities reduces a household's daily commute and other travel demands. Encouraging new homes in already developed areas and areas of opportunity not only alleviates the housing crisis but also supports the State's climate change and equity goals" (page 3).
    - **Housing for persons with disabilities "could greatly benefit from access to transit options**" (page 12).
    - The Center for Neighborhood Technology-developed Housing and Transportation Affordability Index shows "**lower overall cost burdens aligning with more transit-accessible areas**" (page 33).

- "State housing and planning law encourages housing development that also helps the State meet its sustainability goals (developing inward and more compactly, close to jobs, transit, and services), and encourages the development of housing that is affordable to Californians at a range of income levels" (page 36).
- "**In urban and suburban areas, compact infill development at increased density is critical for addressing housing needs and using valuable, location-efficient land near transit and job centers**" (page 43).

7.3.2 Data Sources

To prepare the Site Inventory, the City utilized multiple data sources. First, it relied on publicly available data, such as the City's General Plan, specific plans, zoning maps, and the San Mateo County (San Mateo County or County) assessment roll. Furthermore, the City utilized resources provided by 21 Elements, a collaborative of all 21 San Mateo County jurisdictions and partner agencies.

As part of its process to assist cities in their Housing Element preparation process, 21 Elements evaluated potential rezoning strategies early in the HEU process and provided jurisdictions with a capacity study table that included a list of sites for the City to consider for the Site Inventory. While many of the sites proved to be unfit for development, the City utilized 21 Elements' analysis as a starting point.

The City's process of evaluating potential sites involved applying specified criteria to identify sites where planned/zoned residential capacity can be realistically achieved.

7.3.3 Housing Units Approved/Entitled/Under Construction

As of August 3, 2022, the City has identified 1,701 pending or entitled housing units that will be constructed during the 6th Cycle Planning Period. The City will credit these units toward its RHNA requirement, pursuant to California Government Code, Section 65583.1. Some of these developments have started construction while others have been approved or are under review. The City expects that all can be built within the 6th Cycle Planning Period based on their current status and the timing of approval and construction for recently built developments. The pending or entitled developments include 69 very low-income units, 156 low-income units, and 44 moderate-income units, based on the developers' applications.

Table 7-3, Entitled and Pending Development Applications, summarizes the pending and entitled units, including the status and the estimated completion date for each project. A description of each zoning designation shown in this table can be found in Chapter 3, Housing Constraints.

Table 7-3. Entitled and Pending Development Applications

Site No.	Address	Status	Area (ac)	Previous[1]		Existing[1]		Density Realism[2]	Units					I:LV Ratio[3]
				Zoning	Max Density	Zoning	Max Density		VLI	LI	Mod.	Ab. Mod.	Total	
2	1301 Broadway	Approved	0.67	Commercial (C)	N/A	Same as Previous	N/A	N/A	0	49	0	50	99	0.02
6	1100 El Camino Real	Approved	5.50	Commercial (C)	N/A	Corridor Mixed Use (CMU)	130	52.6%	19	0	0	357	376	2.32
8	959 El Camino Real	Approved	1.81	Commercial (C)	N/A	Corridor Mixed Use (CMU)	130	118.1%	26	0	0	252	278	1.95
12	480 El Camino Real	Approved	0.13	Commercial (C)	N/A	Corridor Mixed Use (CMU)	130	53.3%	0	0	0	9	9	0.00
15	300 El Camino Real	In Review	0.12	Commercial (C)	N/A	Corridor Mixed Use (CMU)	130	93.5%	0	0	0	14	14	4.93
16	230 Broadway	In Review	0.05	Downtown Improvement Area (DIA)	N/A	Downtown Mixed Use (DMU)	50	200.0%	0	0	0	5	5	0.33
17	150 Serra Ave.	Approved	3.60	Transit Oriented Development (TOD)	80	Same as Previous	80	169.4%	0	49	24	415	488	0.25
18	130-140 El Camino Real	In Review	0.23	Transit Oriented Development (TOD)	80	Same as Previous	80	164.0%	0	3	0	27	30	0.21
19	300 Millbrae, Bldg. 6A[4]	Built	0.54	Transit Oriented Development (TOD)	80	Same as Previous	80	182.9%	24	55	0	0	79	0.00
20	300 Millbrae, Bldg. 5B[5]	Built	2.68	Transit Oriented Development (TOD)	80	Same as Previous	80	149.3%	0	0	20	300	320	0.67
23	450 Chadborne	Approved	0.63	Single Family Residential (R-1)	9	Same as Previous	9	18.1%	0	0	0	1	1	5.42
25	842 Clearfield	Approved	0.11	Single Family Residential (R-1)	9	Same as Previous	9	100.0%	0	0	0	1	1	0.00
26	990 Larkspur	Approved	0.09	Single Family Residential (R-1)	9	Same as Previous	9	127.5%	0	0	0	1	1	0.00
TOTAL									**69**	**156**	**44**	**1,432**	**1,701**	

[1] The City adopted the Downtown and El Camino Real Specific Plan (DECRSP) as part of the 2040 General Plan in December 2022. The DECRSP rezoned parcels within its specific plan area to allow for increased densities. The City is using the existing zoning and densities for purposes of this analysis and showing the previous zoning for background, as allowed by HCD during a meeting with staff on July 29, 2022. See Section 7.3.4.2 of this Sites Inventory chapter for more information.

[2] For pending and entitled developments, "Density Realism" is based on the existing zoning for the development, rather than the previous zoning. There is no density realism for Site 2 because zoning is not changing and residential development is not allowed in Commercial (C) zones without a CUP. For other sites, "Density Realism" is an assumption based on the realized density of recent and proposed developments.

[3] The Improvement to Land Value Ratio represents a comparison of a parcel's improvement value to the land value. Typically, a low ratio would indicate a low improvement value in comparison to the value of the land, which can point to a need for development of improvement.

[4] 300 Millbrae is the address for the Gateway at Millbrae Station, which consists of multiple buildings. Site 19 (APN 024-181-080) is a 100% affordable housing development with veteran preference.

[5] 300 Millbrae is the address for the Gateway at Millbrae Station, which consists of multiple buildings. Site 20 (APN 024-180-350) is a market-rate housing development that consists of 320 units, of which 20 are affordable to moderate-income households.

Source: *City of Millbrae.*

7.3.3.1 Affordable Housing Units Approved/Entitled/Under Construction/Completed

The previously mentioned **approved, entitled, and in-process projects include seven developments with units affordable to 69 very low-, 156 low, and 44 moderate-income households**. Table 7-4, Rent and Income Level Summary for Entitled and Pending Affordable Developments, provides information on all pipeline projects, including these seven sites with affordable units. In addition to status, zoning, density allowances, and income categories for all the sites, Table 7-4 includes a unit size breakdown for projects with affordable units, as well as a rent estimate for each unit size, pursuant to Health and Safety Code Section 50053, which prescribes the methodology used by HCD to calculate affordable rent limits. This methodology involves calculating the product of 30% times the income level percentage (i.e., 50% for very low-, 60% for low-, and 110% for moderate-income households) of the area median income, adjusted for family size appropriate for the unit.

Table 7-4 Rent and Income Level Summary for Entitled and Pending Affordable Developments

Site No.	Address	Status	Previous		Existing		Income Category					Affordable Unit Size Breakdown	Affordable Unit Rents[1]
			Zoning	Max Den	Zoning	Max Den	VL	Low	Mod	Above Mod	Total		
PIPELINE DEVELOPMENTS													
2	1301 Broadway	Approved	Commercial (C)	N/A	Same as Previous	N/A	0	49	0	50	99	**Low Income** **Studio**: 17 du **1 bd:** 5 du **2 bd:** 13 du **3 bd:** 14 du	**Low Income** **Studio**: $1,743 **1 bd:** $1,992 **2 bd:** $2,241 **3 bd:** $2,490
6	1100 El Camino Real	Approved	Commercial (C)	N/A	Corridor Mixed Use (CMU)	130	19	0	0	357	376	**Very Low Income** **Studio**: 2 du **1 bd:** 10 du **2 bd:** 7 du	**Very Low Income** **Studio**: $1,453 **1 bd:** $1,660 **2 bd:** $1,868
8	959 El Camino Real	Approved	Commercial (C)	N/A	Corridor Mixed Use (CMU)	130	26	0	0	252	278	**Very Low Income** **Studio**: 3 du **1 bd:**14 du **2 bd:** 8 du **3 bd:** 1 du	**Very Low Income** **Studio:** $1,453 **1 bd:** $1,660 **2 bd:** $1,868 **3 bd:** $2,075
12	480 El Camino Real	Approved	Commercial (C)	N/A	Corridor Mixed Use (CMU)	130	0	0	0	9	9	Rents not calculated for market-rate units	Rents not calculated for market-rate units
15	300 El Camino Real	In Review	Commercial (C)	N/A	Corridor Mixed Use (CMU)	130	0	0	0	14	14	Rents not calculated for market-rate units	Rents not calculated for market-rate units
16	230 Broadway	In Review	Downtown Improvement Area (DIA)	N/A	Downtown Mixed Use (DMU)	50	0	0	0	6	6	Rents not calculated for market-rate units	Rents not calculated for market-rate units
17	150 Serra Ave.	Approved	Transit Oriented Development (TOD)	80	Same as Previous	80	0	49	24	415	488	**Low Income** / **Moderate Income** **Studio**: 2 du / **Studio**: 2 du **1 bd:** 21 du / **1 bd:** 10 du **2 bd:** 25 du / **2 bd:** 11 du **3 bd:** 1 du / **3 bd:** 1 du	**Low Income** / **Moderate Income** **Studio**: $1,743 / **Studio**: $3,196 **1 bd:** $1,992 / **1 bd:** $3,652 **2 bd:** $2,241 / **2 bd:** $4,109 **3 bd:** $2,490 / **3 bd:** $4,565
18	130-140 El Camino Real	In Review	Transit Oriented Developme nt (TOD)	80	Same as Previous	80	0	3	0	27	30	**Low Income** **2 bd**: 3 du	**Low Income** **2 bd**: $2,241
19	300 Millbrae, Bldg. 6A	Built	Transit Oriented Development (TOD)	80	Same as Previous	80	24	55	0	0	79	**Very Low Income** / **Low Income** **Studio**: 10 du / **Studio**: 24 du **1 bd:** 14 du / **1 bd:** 31 du	**Very Low Income** / **Low Income** **Studio**: $1,453 / **Studio**: $1,743 **1 bd:** $1,660 / **1 bd:** $1,992
20	300 Millbrae, Bldg. 5B	Built	Transit Oriented Development (TOD)	80	Same as Previous	80	0	0	20	300	320	**Moderate Income** **Studio**: 7 du **1 bd:** 7 du **2 bd:** 5 du **3 bd:** 1 du	**Moderate Income** **Studio**: $3,196 **1 bd:** $3,652 **2 bd:** $4,109 **3 bd:** $4,565
23	450 Chadborne	Approved	Single Family Residential (R-1)	8.7	Same as Previous	8.7	0	0	0	1	1	Rents not calculated for market-rate units	Rents not calculated for market-rate units
25	842 Clearfield	Approved	Single Family Residential (R-1)	8.7	Same as Previous	8.7	0	0	0	1	1	Rents not calculated for market-rate units	Rents not calculated for market-rate units
26	990 Larkspur	Approved	Single Family Residential (R-1)	8.7	Same as Previous	8.7	0	0	0	1	1	Rents not calculated for market-rate units	Rents not calculated for market-rate units
AVERAGE:				**49.4**		**76**	**69**	**156**	**44**	**1,433**	**1,702**		

[1] Health and Safety Code Section 50053 prescribes the methodology HCD uses to calculate affordable rent limits. Generally, the methodology involves calculating the product of 30% times the percentage corresponding to each income level (i.e. 50% for very low-, 60% for low-, and 110% for moderate-income households) of the area median income adjusted for family size appropriate for the unit. The City utilized the area median income provided in HCD's 2022 income limits for these calculations.

Source: *City of Millbrae.*

In addition, four developments with 297 market-rate units (not including ADUs) were built since 2005 (See Table 7-5, Income Level Summary for Completed Developments Since 2005). One development approved in 2007 (88 South Broadway) includes one unit affordable to low-income households and 10 units affordable to moderate-income households. In addition, 120 S. El Camino Real was approved in 2014 and includes one unit affordable to very low-income households and one affordable to low-income households. The four developments and accessory dwelling units presented in Table 7-5 illustrate the feasibility of high-density and affordable housing development in Millbrae. This high-density development feasibility is a crucial element of this Site Inventory analysis.

Furthermore, the City approved the development of 13, 11, 11, and 7 ADUs affordable to very low-, low-, moderate-, and above moderate-income households, respectively. Table 7-5 lists the affordability levels for these four completed developments.

Table 7-5. Income Level Summary for Completed Developments Since 2005

Development Name	Address	Year Built	Units[1]			
			VLI	LI	Mod.	Ab. Mod.
88 South Broadway	88 South Broadway	2007	0	1	10	94
Belamor	151 El Camino Real	2010	0	0	0	142
Pinedera	120 S El Camino Real	2014	1	1	0	52
30 Hermosa	30 Hermosa	2021	0	0	0	9
Accessory Dwelling Units	Various Addresses	2019-2021	13	11	11	7
TOTAL			**14**	**13**	**21**	**304**

[1] The total units for the completed developments in this table will not correspond to the total 5th Cycle Planning RHNA permitted units, as it represents a different time period for completed developments. Please see Table 7-3 for information on approved projects and projects under review.

Source: *City of Millbrae, 2019-2021 Annual Progress Reports.*

To address affordable housing needs, it is important to note that the City adopted an Inclusionary Housing ordinance in 2021 requiring that all new residential developments provide affordable units as part of the project or pay an in-lieu fee to be used to support affordable housing developments (to allow flexibility to developers). Additionally, the City adopted a Commercial In-Lieu fee in 2021 to be paid by all new commercial development projects to be used to support affordable housing projects to address affordable housing needs generated by new development. Chapter 3, Housing Constraints, describes these recent requirements.

7.3.3.2 Approval of Housing Units Approved/Entitled/Under Construction

As shown in Table 7-12. Proposed and Recently Built Development Projects, the City has approved 10 projects in the last five years (since 2018). In that same period, the City has only seen one proposed project drop out, meaning the City has a 9% dropout rate. As such, a large majority of submitted development projects continue to move forward to construction. One of the main reasons why a project may not move forward is the high cost of construction, which has risen dramatically over the past several years, along with higher interest rates.

According to a report by the National Association of Home Builders (NAHB), the cost of construction has been increasing significantly over the past several years. The report shows that from 2015 to 2020, the cost of construction materials increased by over 30%, while the cost of labor increased by over 20% (NAHB, 2021). This increase in construction costs can make it challenging for developers to undertake new projects, particularly when they have limited access to capital.

In the City, many commercial property owners are family owned. **As a result, the high cost of construction and interest rates play a more significant role in their decision to redevelop.** A report by the Urban Land Institute (ULI) shows that developers are increasingly relying on equity financing and other alternative sources of funding to overcome these challenges (ULI, 2019).

Additionally, many commercial properties in the City have been owned for generations and passed on to heirs with low property taxes and positive cash flow. As a result, heirs often have little appetite to take on additional risk, making it challenging to secure financing for redevelopment projects (ULI, 2019). Case studies of development projects in the City illustrate these challenges and include:

- **Site 17 - 150 Serra Avenue (Millbrae Serra Station)** – This pipeline project was *approved* for the construction of an up to 488-unit development that will replace multiple commercial buildings. 150 Serra has a 10-year development agreement with the City of Millbrae, which vested the entitlements to 2028 and provided the developer an option to extend the development agreement an additional five years, to 2033. ***Because the project is approved, the City expects the unit to be developed within the 6th Cycle planning period.***

- **Site 23 – 450 Chadborne** – This pipeline project is *approved* for the development of one dwelling unit, in addition to an existing unit already on the site. The site is primarily occupied by a church and the residential units are ancillary to the primary church use.

The church has reportedly had difficulty with PG&E, as they required utility upgrades for the church, which would be costly and not accounted for in their budget, delaying the development of the unit. ***Because the project was approved in 2019 and the church is working on addressing PG&E requirements, the City expects the unit to be developed within the 6th Cycle planning period.***

Other entitled projects have already submitted building permits and are currently under review, have been approved for construction, or are already built:

- **Site 2 – 1301 Broadway** – This pipeline project is currently *approved* for the construction of a 99-unit development replacing a one-story dental office building. ***Because the project is approved, the City expects the unit to be developed within the 6th Cycle planning period.***

- **Site 6 – 1100 El Camino Real** – This pipeline project was *approved* for the construction of a 376-unit building that will replace the El Rancho Inn Motel. ***Because the project is approved, the City expects the unit to be developed within the 6th Cycle planning period.***

- **Site 8 – 959 El Camino Real** – This pipeline project was *approved* for the construction of a 278-unit development replacing a former Office Depot. ***Because the project is approved, the City expects the unit to be developed within the 6th Cycle planning period.***

- **Site 12 – 480 El Camino Real** – This pipeline project was *approved* for the construction of a 9-unit development on a former private surface parking lot. ***Because the project is approved, the City expects the unit to be developed within the 6th Cycle planning period.***

- **Site 15 – 300 El Camino Real** – This pipeline project is currently *under review* for the construction of a 14-unit development that will replace the Tai Wu Restaurant. ***This pipeline project does not experience the constraints mentioned above (i.e., generational ownership with little appetite to redevelop and PG&E constraints). As such, the City expects the unit to be developed within the 6th Cycle planning period.***

- **Site 16 – 230 Broadway** – This pipeline project is currently *under review* for a building permit for the construction of a 6-unit development that will replace a two-story, commercial building with retail on the first story and one residential unit on the second story. ***This pipeline project does not experience the constraints mentioned above (i.e., generational ownership with little appetite to redevelop and PG&E constraints). As such, the City expects the unit to be developed within the 6th Cycle planning period.***

- **Site 18 – 130-140 El Camino Real** – This pipeline project is currently *under review* for the development of a 30-unit development that will replace a medical office building. ***This pipeline project does not experience the constraints mentioned above (i.e., generational ownership with little appetite to redevelop and PG&E constraints). As such, the City expects the unit to be developed within the 6th Cycle planning period.***

- **Site 19 – 300 Millbrae, Building 6A** – This is a 79-unit development *built* on a former parking lot in 2023. ***The project was completed in 2023, within the 6th Cycle planning period.***

- **Site 20 – 300 Millbrae, Building 5B** – This is a 320-unit development *built* on a former parking lot in 2023. ***The project was completed in 2023, within the 6th Cycle planning period.***

- **Site 25 – 842 Clearfield** – This pipeline project was *approved* for the construction of an up to 488-unit development that will replace multiple commercial buildings. ***Because the project is approved, the City expects the unit to be developed within the 6th Cycle planning period.***

As shown in Table 7-12, Proposed and Recently Built Development Projects, and as discussed in Section 7.6.1.2, the proposed developments are estimated to be completed by 2026.

In conclusion, the high cost of construction and interest rates are barriers to development in the City, particularly for family-owned commercial properties with limited access to capital. Alternative sources of funding and innovative financing strategies may be necessary to overcome these challenges and facilitate the redevelopment of commercial properties in the City. To assist developers with the cost of construction, the City included the following programs to help mitigate the costs of construction:

- **HIP-18.** Encourage and Incentivize Accessory Dwelling Units (ADUs)
- **HIP-31.** Pursue State and Federal Funding for Affordable Housing
- **HIP-32.** Local Funding for Affordable Housing
- **HIP-35.** Assist with the Development of Lower-Income Housing
- **HIP-36.** Funding, Incentives, and Concessions for Extremely Low-Income Developments

7.3.3.3 Accessory Dwelling Units

Pursuant to California Government Code, Section 65583.1, **the City will credit a total of 112 units during the 6th Cycle period toward its RHNA requirement through the potential**

development of ADUs. The production of ADUs has increased in the City since 2018 due to new State laws passed to spur the development of such units. Between 2018 and 2021, the City reported an average of 14 ADUs permitted each year. The ADUs were reported in Table A2 of the annual progress reports (APRs). Table 7-6, ADU Permits Issued, 2018–2021, details the number of ADUs that the City permitted during the 5th Cycle.

Table 7-6. ADU Permits Issued, 2018–2021

Year	VLI	LI	Mod.	Above Mod.	Total
2018	-	-	-	-	-
2019	5	5	4	4	18
2020	2	1	2	1	6
2021	6	5	5	2	18
TOTAL	**13**	**11**	**11**	**7**	**42**
Annual Average	**4**	**4**	**4**	**2**	**14**

Source: *City of Millbrae, 2018-2021 Annual Progress Reports.*

The HCD Site Inventory Guidebook directs that the trend in ADU construction since January 2018 can be used to estimate new production. Furthermore, resources and incentives that will encourage the development of ADUs can support a projection of further growth to the trend since 2018. The City first applied the trend in ADU permits in 2018 to estimate ADUs expected during the 6th Cycle. The City allocated projected ADUs to income categories in accordance with the information available for ADU permits issued between 2018 and 2021. Table 7-7, Potential ADU Production by Income Level (Using 30-30-30-10 Affordability Split), provides a summary of the 64 ADUs by income level.

Table 7-7. Potential ADU Production by Income Level (Using 30-30-30-10 Affordability Split)

Income Level	VLI	LI	Mod.	Above Mod.	Total
Projected Total Units	**34**	**34**	**33**	**11**	**112**

Source: *City of Millbrae*

To support the development of ADUs, the City included Program HIP-18, Encourage and Incentivize Accessory Dwelling Units (ADUs). The program focuses on making information more accessible, looking for incentives (i.e., Pre-approved plans and reduced building permit fees., and monitoring the production and affordability of ADUs. Program HIP-18 will support the development of the estimated 112 ADUs for the 6th Planning Cycle. However, the program also

includes the monitoring of production and affordability of ADUs to ensure that the Housing Element ADU assumptions are met and adjust actions, as appropriate.

7.3.4 Specific Plans

All of the sites in the Site Inventory are zoned to allow for residential development in some capacity. This includes zoning that exclusively allows residential development, mixed-use and planned development zoning that includes residential, and transit-oriented zoning that requires a minimum of 15% of residential units to be affordable. HCD's Site Inventory Guidebook requires further analysis for sites located in specific plans or master plan areas. **Of the City's 26 sites, 22 are located in a specific plan area**. More specifically, 16 sites are located in the Downtown & El Camino Real Specific Plan (DECRSP) area, and six sites are located in the Millbrae Station Area Specific Plan (MSASP) area.

7.3.4.1 Millbrae Station Area Specific Plan (adopted in 1998 with multiple updates over 24 years)

The 16-acre MSASP governs development in the vicinity of the Bay Area Rapid Transit (BART)/Caltrain Millbrae Station (Millbrae Station), which opened in 2003. In 1998, the City prepared and adopted the MSASP with the intent of creating a compact, walkable area that is highly transit-oriented in preparation for the upcoming Millbrae Station. The MSASP allows residential densities of between 30 and 80 dwelling units to the acre and allows higher density with the provision of community benefits.

To date, three developments with 301 total units have been completed in the MSASP, and another three projects have been approved to be built during the 6th Cycle Planning Period with an additional 887 units, including 128 lower-income units. Furthermore, one project is undergoing review for the development of 30 units, including 5 low-income units.

7.3.4.2 Downtown and El Camino Real Specific Plan (Adopted on December 1, 2022)

As part of the 2040 General Plan update, the City adopted the DECRSP in December 2022, which includes all parcels adjacent to El Camino Real that are not already within the MSASP (see Figure 7-1, MSASP and DECRSP Boundaries). The DECRSP focuses on downtown and the El Camino Real corridor, which will undergo the majority of change and development in the City over the next couple of decades. The overall objective of the DECRSP is to provide the overarching policy framework and development regulations that are necessary to accommodate future housing needs and create a community with access to employment, transportation, goods,

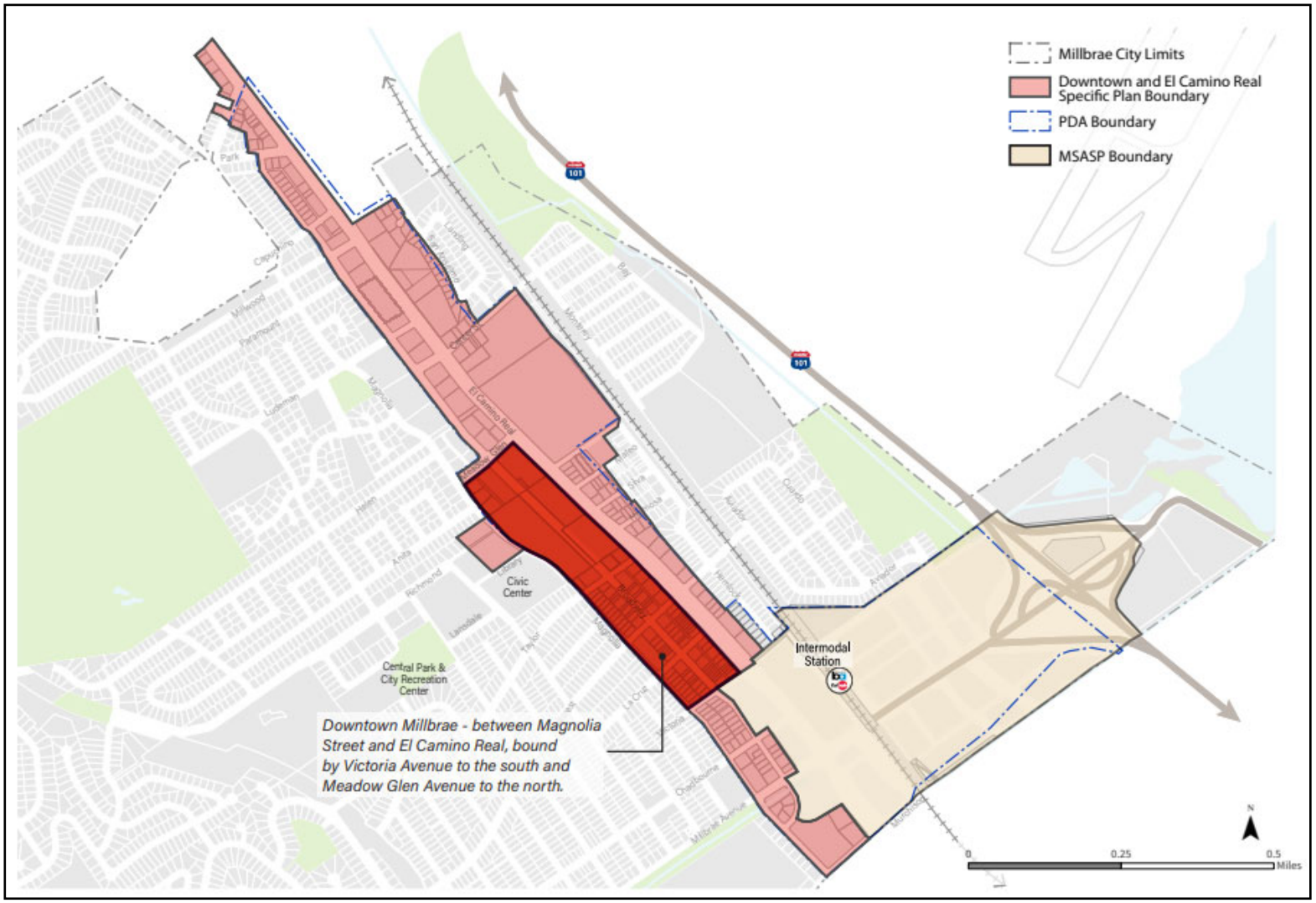
and services. To encourage the development of affordable and accessible housing near transit, the DECRSP area includes the following policies:

- **H-1:** Affordable housing requirement for residential development projects.
- **H-2:** Affordable housing commercial linkage impact fee
- **H-3:** Relocation assistance

Additionally, the DECRSP includes multiple development standards and guidelines that encourage the development of higher-density residential developments, such as increased height allowances and higher allowable densities. The DECRSP allows residential densities of between 25 and 130 dwelling units per acre. Figure 7-1, MSASP and DECRSP Boundaries provides a visual of the specific plan boundaries.

The public review draft of the DECRSP was released on June 16, 2022, and the final draft was adopted on December 1, 2022. During a meeting with HCD staff on July 29, 2022, the City confirmed that the increased density allowances and new zoning in the DECRSP could be utilized for the analysis of this Site Inventory as long as the DECRSP was approved before the beginning of the Association of Bay Area Government's 6th Cycle Planning Period, or January 31, 2023. The City approved the DECRSP on December 1, 2022, and has, therefore, utilized existing zoning and density allowances for the analysis of sites in this Site Inventory chapter, while including information on the previous zoning and densities.

Figure 7-1. MSASP and DECRSP Boundaries



Source: *City of Millbrae*

7.3.4.3 Specific Plan Area Sites

Pursuant to page 18 of HCD's Site Inventory Guidebook, the Housing Element must contain specific sites by parcel number (provided in Table 7-8, Specific Plan Area Sites, and in Appendix C) and demonstrate that the sites are available and suitable for development within the Planning Period, including the following:

- **Date of approvals and expiration dates.**
  - MSASP - was originally adopted in 1998 along with the General Plan, and ahead of the opening of the Millbrae Station (2003), was updated in 2016 and has been amended several times since. The MSASP has no expiration date, but it is envisioned that the final phase will conclude in 2035.
  - DECRSP - the public review draft was released on June 16th, 2022, and the adoption took place on December 2022, with no planned expiration date.
- **Approved or pending projects in the planning period, including anticipated affordability based on the actual or projected sale prices, rent levels, or other mechanisms establishing affordability in the planning period.**

  All approved or pending projects are described below, with information on affordability levels and rents provided in Table 7-4.
- **MSASP**
  - Site 17 - 150 Serra Avenue (APNs 024-154-460, 024-337-010, -080, and -090): The Millbrae Serra Station mixed-use project was *approved* in 2019 and includes 488 units, of which 49 (10%) are low-income, and 24 (5%) are moderate-income units. Construction has not yet begun.
  - Site 18 - 130–140 El Camino Real (APN 024-335-150): 130 El Camino Real is currently *under review* for the development of 30 residential units, including three (10%) affordable to very low-income households.
  - Site 19 - 300 Millbrae (Bldg. 6A) (APN 024-181-080): the Gateway at Millbrae Station Building 6A affordable housing project received building permits in 2020 and includes 79 units, of which 100% are affordable. The project provides 24 (30%) and 55 (70%) units affordable to very low- and low-income veteran households, respectively. Construction on the project finished in 2023.
  - Site 20 - 300 Millbrae (Bldg. 5B) (APNs 024-180-350): the Gateway at Millbrae Station mixed-use project received building permits in 2019 and includes 320 units, of which 20 (6%) are affordable to moderate-income households. Construction on the project finished in 2023.

- **DECRSP**
  - Site 6 - 1100 El Camino Real (APN 021-324-320): the El Rancho Inn Redevelopment project was *approved* in 2022 and includes 384 residential units, of which 19 (5%) are affordable to very low-income households. The site will replace a motel and eight residential units for a net total of 376 residential units. Program HIP-13 in the Housing Plan will address the replacement of the eight units.
  - Site 8 - 959 El Camino Real (APN 021-364-080): 959 El Camino Real was *approved* in 2022 and includes 278 units, of which 26 (9.6%) are affordable to very low-income households.
  - Site 12 – 480 El Camino Real (APN 021-154-240): 480 El Camino Real was *approved* in 2020 and includes nine market-rate units.
  - Site 15 – 300 El Camino Real (APN 024-154-240): 300 El Camino Real is *under review* for the development of 14 market-rate units.
  - Site 16 – 230 Broadway (APN 024-152-180): 230 Broadway is *under review* for the development of six market-rate units. The site will replace a commercial building with one residential unit on the second story. Program HIP-13 in the Housing Plan will address the replacement of the unit.

More information about these projects, as well as above moderate approved or pending projects, in the specific plan areas, is provided in Table 7-8. Please see Section 7.6.2 for a detailed description of the Density Realism assumptions shown in Table 7-8.

It is important to note that three residential and mixed-use developments with a total of 301 market-rate units were completed in the MSASP since 2007 and one residential development with 9 market-rate units was completed in the DECRSP in 2016.

Table 7-8. Specific Plan Area Sites (Necessary Steps for Entitlements Found in Chapter 3, Housing Constraints)

Site No.	APN	Address	Area (ac)	Previous[1]		Existing[1]		Density Realism[2]	Units					SP Area	SP Adoptn. Date[3]	I:LV Ratio[4]	Status	Dev. Agmt.
				Zoning	Max Density	Zoning	Max Density		VLI	LI	Mod.	Above Mod.	Total					
1	021-278-010	1395 El Camino Real	0.60	Commercial (C)	N/A	Residential Mixed Use (RMU)	80	95%	-	-	45	-	45	DECRSP	N/A	0.12	Opportunity	N/A
3	021-291-020	1201 El Camino Real	0.54	Commercial (C)	N/A	Residential Mixed Use (RMU)	80	95%	-	-	40	-	40	DECRSP	N/A	0.18	Opportunity	N/A
4	021-292-030, 021-292-070	1121 El Camino Real; 1125 El Camino Real	1.12	Commercial (C)	N/A	Residential Mixed Use (RMU)	80	95%	-	-	84	-	84	DECRSP	N/A	0.86	Opportunity	N/A
5	021-324-310	1150 El Camino Real	0.55	Commercial (C)	N/A	Corridor Mixed Use (CMU)	130	85%	61	-	-	-	61	DECRSP	N/A	0.24	Opportunity	N/A
6	021-324-320	1100 El Camino Real	5.50	Commercial (C)	N/A	Corridor Mixed Use (CMU)	130	53%	19	-	-	357	376	DECRSP	N/A	2.32	Approved	Affordable Housing Requirement and Regulatory Agreement
7	021-362-310	979 Broadway	1.11	Planned Development (PD)	N/A	Residential Mixed Use (RMU)	80	95%	11	-	73	-	84	DECRSP	N/A	0.82	Opportunity	N/A
8	021-364-080	959 El Camino Real	1.81	Commercial (C)	N/A	Corridor Mixed Use (CMU)	130	118%	26	-	-	252	278	DECRSP	N/A	1.95	Approved	Affordable Housing Requirement and Regulatory Agreement
9	021-420-220	West of Magnolia Ave. and Library Ave.	3.11	Planned Development (PD)	N/A	Residential Mixed Use (RMU)	80	95%	50	38	60	88	236	DECRSP	N/A	0.06	Opportunity	N/A
10	021-420-110	537 Broadway	5.63	Planned Development (PD)	N/A	Corridor Mixed Use (CMU)	130	85%	110	65	-	449	624	DECRSP	N/A	2.45	Opportunity	N/A
11	021-420-130	Parking Lot on El Camino Real	2.20	Planned Development (PD)	N/A	Corridor Mixed Use (CMU)	130	85%	80	40	-	124	244	DECRSP	N/A	0.05	Opportunity	N/A
12	021-314-100	480 El Camino Real	0.13	Commercial (C)	N/A	Corridor Mixed Use (CMU)	130	53%	-	-	-	9	9	DECRSP	N/A	0.00	Approved	N/A
13	024-123-190, 024-123-200	450 El Camino Real; 460 El Camino Real	0.88	Commercial (C)	N/A	Corridor Mixed Use (CMU)	130	85%	85	12	-	-	97	DECRSP	N/A	0.04	Opportunity	N/A
14	024-123-130, 024-123-140	400 El Camino Real; 420 El Camino Real	0.84	Commercial (C)	N/A	Corridor Mixed Use (CMU)	130	85%	92	-	-	-	92	DECRSP	N/A	0.44	Opportunity	N/A

Table 7-8 (Continued)

Site No.	APN	Address	Area (ac)	Previous[1]		Existing[1]		Density Realism[2]	Units					SP Area	SP Adoptn. Date[3]	I:LV Ratio[4]	Status	Dev. Agmt.
				Zoning	Max Density	Zoning	Max Density		VLI	LI	Mod.	Above Mod.	Total					
15	024-154-240	300 El Camino Real	0.12	Commercial (C)	N/A	Corridor Mixed Use (CMU)	130	93%	-	-	-	14	14	DECRSP	N/A	4.93	In Review	N/A
16	024-152-180	230 Broadway	0.05	Downtown Improvement Area (DIA)	N/A	Downtown Mixed Use (DMU)	50	200%	-	-	-	5	5	DECRSP	N/A	0.33	In Review	N/A
17	024-154-460, 024-337-010, 024-337-080, 024-337-090	150 Serra Ave.	3.60	Transit Oriented Development (TOD)	80	Same as Previous	80	169%	-	49	24	415	488	MSASP	11/24/98	0.25	Approved	Development Agreement
18	024-335-150	130-140 El Camino Real	0.23	Transit Oriented Development (TOD)	80	Same as Previous	80	164%	-	3	-	27	30	MSASP	11/24/98	0.21	In Review	Affordable Housing Requirement and Regulatory Agreement
19	024-181-080	300 Millbrae, Bldg. 6A	0.54	Transit Oriented Development (TOD)	80	Same as Previous	80	183%	24	55	-	-	79	MSASP	11/24/98	0.00	Built	Affordable Housing Requirement and Regulatory Agreement
20	024-180-350	300 Millbrae, Bldg. 5B	2.68	Transit Oriented Development (TOD)	80	Same as Previous	80	149%	-	-	20	300	320	MSASP	11/24/98	0.67	Built	Affordable Housing Requirement and Regulatory Agreement
21	024-334-150	39 El Camino Real	0.57	Residential Mixed Use (RMU)	60	Same as Previous	60	95%	-	-	32	-	32	MSASP	11/24/98	0.50	Opportunity	N/A
22	024-334-020, 024-334-030	15 El Camino Real; 9 El Camino Real	0.61	Residential Mixed Use (RMU)	60	Same as Previous	60	95%	-	-	34	-	34	MSASP	11/24/98	0.39	Opportunity	N/A
24	024-344-090	95 Murchison Dr.	3.10	Commercial (C)	N/A	Corridor Mixed Use (CMU)	130	85%	80	45	-	219	344	DECRSP	N/A	0.79	Opportunity	N/A
TOTAL									638	307	412	2,259	3,616					

[1] The City adopted the Downtown and El Camino Real Specific Plan (DECRSP) as part of the 2040 General Plan in December 2022. The DECRSP rezoned parcels within its specific plan area to allow for increased densities. The City is using the existing zoning and densities for purposes of this analysis and showing the previous zoning for background, as allowed by HCD during a meeting with staff on July 29, 2022. See Section 7.3.4.2 of this Sites Inventory chapter for more information.

[2] For pending and entitled developments (Sites 6, 8, 12, and 15-20), "Density Realism" is based on the proposed development. For other sites, "Density Realism" is an assumption based on realized density of recent and proposed developments.

[3] Neither of the specific plans have an expiration date. However, the MSASP does envision three phases of development with the final phase concluding in 2035.

[4] The Improvement to Land Value Ratio represents a comparison of a parcel's improvement value to the land value. Typically, a low ratio would indicate a low improvement value in comparison to the value of the land, which can point to a need for development of improvement.

Source: City of Millbrae.

- **Describe necessary approvals or steps for entitlements for new development (e.g., design review, site plan review, etc.).**

  Chapter 3, Housing Constraints, of this Housing Element, provides detailed information on the process for approval for entitlements for new development, including within the specific plan areas. Every application for a permit for the construction, alteration, or exterior modification (except for minor alterations and modifications) of a building is subject to a design review permit in the City. The design review application materials are evaluated by planning staff, and then the Planning Commission, who must make the findings which are codified in the Zoning Ordinance, for approval. Within the MSASP, an applicant may enter into a development agreement with the City to provide community benefits in exchange for increased building allowances, such as Floor Area Ratio (FAR) and residential density.

- **Describe any development agreements and conditions or requirements such as phasing or timing requirements that impact development in the Planning Period.**

  Within the MSASP, applicants prepare and submit a submittal package for design review that includes, but is not limited to a conceptual development plan, a phasing plan, a precise development plan, and a transportation demand management plan – all of which are reviewed by the Planning Commission and is subject to findings that are codified in the Zoning Ordinance. If the applicant seeks additional FAR and/or density allowances beyond those provided under density bonus law, a development agreement is also required, wherein the community benefits are outlined.

7.3.5 Infrastructure Availability - Site Access to Water, Sewer, and Dry Utilities

7.3.5.1 Water and Sewer

An analysis of water and sewer capacity was conducted by a licensed utility engineer with Harris and Associates by reviewing the Urban Water Management Plans for the San Francisco Public Utilities Commission (SFPUC) and the Regional Water System (RWS).

The City receives wholesale water from SFPUC and distributes it to approximately 23,000 residents. Following the distribution process, Millbrae collects and treats all wastewater generated. The City operates a municipal water system, with the boundaries of the service area coterminous with the City limits. **Water distribution and wastewater treatment are accessible to all 26 sites in the Housing Element Sites Inventory.**

Millbrae is essentially built out (i.e., little to no vacant land), with the expectation of a handful of development and redevelopment projects that have been planned in Millbrae Station (as a part

of the MSASP). As a result, the City's population is projected to increase at a relatively steady pace from 22,832 in 2020 to 27,605 in 2045.

As stated in the 2020 Urban Water Master Plan, the City of Millbrae has an Individual Supply Guarantee with SFPUC for 3.15 Million Gallons of Water per day (MGD) for a total annual quantity of 1,150 Million Gallons. During normal water supply periods, the City does not anticipate water supply shortages until the year 2045 (See Figure 7-2, Normal Year Supply and Demand Comparison).

SFPUC has adequate water supplies to meet demands during the Housing Element 6th Cycle Planning Period. However, as shown in Figure 7-3, Consecutive Dry Year Supply and Demand Comparison, during single and multiple dry years throughout the City's 25-year General Plan Planning Period the City's supply will be cut back drastically.

Figure 7-2. Normal Year Supply and Demand Comparison

	2025	2030	2035	2040	2045
Supply total (MG)	1,150	1,150	1,150	1,150	1,150
Demand total (MG)	835	913	896	1,029	1,170
Difference (MG)	315	237	254	121	(20)

Source: *City of Millbrae 2020 UWMP, Table 7-5*

Figure 7-3. Consecutive Dry Year Supply and Demand Comparison

		2025	2030	2035	2040	2045
First year	Supply totals	533	580	569	653	635
	Demand totals	835	913	896	1,029	1,170
	Difference	(302)	(333)	(327)	(376)	(535)
Second year	Supply totals	456	500	489	558	635
	Demand totals	835	913	896	1,029	1,170
	Difference	(379)	(413)	(407)	(471)	(535)
Third year	Supply totals	456	500	489	558	635
	Demand totals	835	913	896	1,029	1,170
	Difference	(379)	(413)	(407)	(471)	(535)
Fourth year	Supply totals	456	500	489	493	540
	Demand totals	835	913	896	1,029	1,170
	Difference	(379)	(413)	(407)	(536)	(630)
Fifth year	Supply totals	456	500	445	493	540
	Demand totals	835	913	896	1,029	1,170
	Difference	(379)	(413)	(451)	(536)	(630)

Source: *City of Millbrae 2020 UWMP, Table 7-7*

The City and SFPUC, through the Bay Area Water Supply and Conservation Agency's (BAWSCA) Long-Term Water Supply Strategy, will continue aggressive water conservation efforts, increased use of recycled water to offset potable water demand, development of groundwater sources within the SFPUC service area, and participation in new water supply projects to ensure supplies continue to meet current and projected demands.

The existing gravity collection system is comprised of approximately 55 miles of gravity sewers, ranging in diameters between 6 and 36 inches. The majority of the system (83%) is composed of vitrified clay pipe.

The Water Pollution Control Plant (WPCP) is located on the northeast corner of US Highway 101 and Millbrae Avenue. The wet weather hydraulic and treatment capacity of the WPCP is 9.0 MGD, and it has approximately 1.3 million gallons of flow equalization that allow the WPCP to accept up to 14.0 MGD during storms.

The City completed a Capacity Assurance Report (CAR) for its wastewater collection system in June 2012. The results of the CAR indicated that the City's collection system has adequate hydraulic capacity for Average Dry Weather Flow and Peak Dry Weather Flow conditions. The hydraulic evaluation in the CAR indicated that under design storm Peak Wet Weather Flow conditions, several portions of the City's collection system provided insufficient capacity to convey flow without SSOs. In addition to gravity mains at various locations throughout the City, the Madrone Pump Station, its associated force main, and the WPCP were found to be hydraulically insufficient for the design storm, potentially requiring capacity improvements and the installation of wet weather storage. Improvement projects were identified and detailed in the CAR and the Wet Weather Alternatives Analysis Final Report of November 2014.

Given the age of the CAR (> 10 years) and the projects identified in the report, the City should have adequate hydraulic capacity at present and into the future, if the City implements the identified projects over the expected analysis period of the report (approximately out to the year 2035).

Government Code, Section 65589.7 (a) requires that any "housing element adopted by the legislative body and any amendments made to that element [be] immediately delivered to all public agencies or private entities that provide water or sewer services for municipal and industrial uses, including residential, within the territory of the legislative body." Pursuant to this requirement, the City will immediately deliver the Housing Element to the agencies providing water and sewer services. The City will include a cover memo describing the Housing Element, including Millbrae's housing needs and regional housing needs.

7.3.5.2 Dry Utilities

Within the City, electrical and natural gas service is provided by Pacific Gas & Electric. Refuse and recyclable collection is provided by the City under contract with South San Francisco Scavenger Company. Additional dry utilities include telecommunications providers and cable providers. No information is available regarding meeting customer demands for these utilities. **However, all 26 sites in the Housing Element Sites Inventory have access to all dry utilities.**

7.3.6 Maps of Sites

The City compiled, organized, and mapped the entire Site Inventory data into a series of maps, shown as Figures 7-4 through 7-7, Site Inventory Maps.

7.4 Sites to Accommodate Moderate-Income Housing

AB 725 (2020) requires housing elements due after January 1, 2022 (metropolitan and suburban jurisdictions) to allocate 25% of their RHNA numbers for moderate- and above moderate-income housing to sites with zoning that allows at least four units of housing, with moderate-income sites being capped at a density of 100 units per acre. The Site Inventory was prepared in adherence to these requirements.

The City has two approved projects containing moderate-income units that are *currently* zoned Transit Oriented Development (TOD), which allows for up to 80 dwelling units per acre. Because these sites are for approved projects and the current zoning has a cap of 80 dwelling units/acre, these sites comply with AB 725 requirements. Additionally, all "opportunity" sites, or sites without currently pending or approved projects, have a maximum density of 80 units/acre. Please see below for more information.

The City's moderate-income units are allocated to a total of nine sites, all of which allow (with the adoption of the DECRSP) at least four units of housing per parcel and a density of up to 80 units per acre depending on the site (except the two sites with approved developments including moderate units that are currently zoned for a maximum of 80 units/acre but will be rezoned for a maximum of 130 units/acre per the approved developments).

The site and zoning breakdown for the moderate-income units is as follows:

- **Two sites with approved projects:**
  - Site 17 - 150 Serra Avenue (APNs 024-154-460, 024-337-010, -080, and -090)**:** Located in the MSASP, the site is currently zoned for Transit Oriented Development (TOD), which allows for *up to 80 dwelling units per acre*.
  - Site 20 - 300 Millbrae (Bldg. 5B) (APNs 024-180-350): Located in the MSASP, the site is currently zoned for Transit Oriented Development (TOD), which allows for *up to 80 dwelling units per acre*.
- **Seven opportunity sites with no planned projects, but appropriate for development:**
  - Site 1 – 1395 El Camino Real (APN 021-278-010): Located in the DECRSP, the site was previously zoned for Commercial (C) development, which does not explicitly allow for residential development so *there is no minimum or maximum density for residential units*. However, developers can obtain approval for residential development by utilizing a CUP. Furthermore, the site was rezoned to Residential Mixed Use (RMU) zoning with the adoption of the DECRSP, which took place on December 1, 2022. Residential Mixed Use (RMU) zoning allows for the development of *up to 80 dwelling units per acre*.

- Site 3 – 1201 El Camino Real (APN 021-291-020): Located in the DECRSP, the site was previously zoned for Commercial (C) development which does not explicitly allow for residential development so *there is no minimum or maximum density for residential units*. However, this property was rezoned for Residential Mixed Use (RMU) development with the adoption of the DECRSP on December 1, 2022. Residential Mixed Use (RMU) zoning allows for the development of *up to 80 dwelling units per acre*.
- Site 4 – 1121 & 1125 El Camino Real (021-292-030 & -070): Located in the DECRSP, the site was previously zoned for Commercial (C) development which does not explicitly allow for residential development so *there is no minimum or maximum density for residential units*. However, this property was rezoned for Residential Mixed Use (RMU) development with the adoption of the DECRSP on December 1, 2022. Residential Mixed Use (RMU) zoning allows for the development of *up to 80 dwelling units per acre*.
- Site 7 – 979 Broadway (APN 021-362-310): Located in the DECRSP, the site was previously zoned for Planned Development (PD) development, which *does not have specific density allowances for residential developments* but any use consistent with the Millbrae General Plan would be permitted, provided the use exists and it is approved by Planning Commission. However, the site was rezoned to Residential Mixed Use (RMU) zoning with the adoption of the DECRSP on December 1, 2022. Residential Mixed Use (RMU) zoning allows for the development of *up to 80 dwelling units per acre*.
- Site 9 – West of Magnolia Ave. and Library Ave. (APN 021-420-220): Located in the DECRSP, the site was previously zoned for Planned (PD) development which *does not have specific density allowances for residential developments* but any use consistent with the Millbrae General Plan would be permitted, provided the use exists and it is approved by City Council. However, the site was rezoned to Residential Mixed Use (RMU) zoning with the adoption of the DECRSP on December 1, 2022. Residential Mixed Use (RMU) zoning allows for the development of *up to 80 dwelling units per acre*.
- Site 21 – 39 El Camino Real (APN 024-334-150): Located in the MSASP, the site is currently zoned for Residential Mixed Use (RMU) development, which allows for *up to 60 dwelling units per acre* in the MSASP area. The RMU zoning allows up to 80 dwelling units per acre if community benefits are provided.
- Site 22 – 15 El Camino Real; 9 El Camino Real (APNs 024-334-020 & -030): Located in the MSASP, the site is currently zoned for Residential Mixed Use (RMU)

development, which allows for *up to 60 dwelling units per acre* in the MSASP area. The RMU zoning allows up to 80 dwelling units per acre if community benefits are provided.

Table 7-9, Moderate-income Sites, further illustrates the breakdown of the moderate-income sites for both approved projects and opportunity sites.

Table 7-9. Moderate-income Sites

Site No.	APN	Address	Previous[1]		Existing[1]		Units					SP Area	Status
			Zoning	Max Density	Zoning	Max Density	VLI	LI	Mod.	Above Mod.	Total		
1	021-278-010	1395 El Camino Real	Commercial (C)	N/A	Residential Mixed Use (RMU)	80	-	-	45	-	45	DECRSP	Opportunity
3	021-291-020	1201 El Camino Real	Commercial (C)	N/A	Residential Mixed Use (RMU)	80	-	-	40	-	40	DECRSP	Opportunity
4	021-292-030, 021-292-070	1121 El Camino Real; 1125 El Camino Real	Commercial (C)	N/A	Residential Mixed Use (RMU)	80	-	-	84	-	84	DECRSP	Opportunity
7	021-362-310	979 Broadway	Planned Development (PD)	N/A	Residential Mixed Use (RMU)	80	11	-	73	-	84	DECRSP	Opportunity
9	021-420-220	West of Magnolia Ave. and Library Ave.	Planned Development (PD)	N/A	Residential Mixed Use (RMU)	80	50	38	60	88	236	DECRSP	Opportunity
17	024-154-460, 024-337-010, 024-337-080, 024-337-090	150 Serra Ave.	Transit Oriented Development (TOD)	80	Same as Previous	80	-	49	24	415	488	MSASP	Approved
20	024-180-350	300 Millbrae, Bldg. 5B	Transit Oriented Development (TOD)	80	Same as Previous	80	-	-	20	300	320	MSASP	Built
21	024-334-150	39 El Camino Real	Residential Mixed Use (RMU)	60	Same as Previous	60	-	-	32	-	32	MSASP	Opportunity
22	024-334-020, 024-334-030	15 El Camino Real; 9 El Camino Real	Residential Mixed Use (RMU)	60	Same as Previous	60	-	-	34	-	34	MSASP	Opportunity
TOTAL							61	87	412	803	1,363		

[1] The City adopted the Downtown and El Camino Real Specific Plan (DECRSP) as part of the 2040 General Plan in December 2022. The DECRSP rezoned parcels within its specific plan area to allow for increased densities. The City is using the existing zoning and densities for purposes of this analysis and showing the previous zoning for background, as allowed by HCD during a meeting with staff on July 29, 2022. See Section 7.3.4.2 of this Sites Inventory chapter for more information.

Source: *City of Millbrae*

The City will credit the following moderate-income units toward the RHNA:

- **Entitled and Pending Projects: 44 units** (see Table 7-3, Entitled and Pending Development Applications, for more details).
- **Potential ADUs over 8-year Planning Period: 33 units** (per Table 7-7, Potential ADU Production by Income Level (30-30-30-10 Split), the average of 14 ADUs permitted annually is multiplied by 8 for the number of years in the 6th Cycle Planning Period and divided using a 30-30-30-10 split for very low-, low-, moderate-, and above moderate-

income, respectively. This calculation yields a total of 112 ADUs for the 6th Cycle Planning Period, with 33 being affordable for moderate-income households.

7.5 Sites to Accommodate Low and Very Low-Income RHNA

7.5.1 Sites Used in Previous Planning Periods' Housing Elements

7.5.1.1 Legal Requirements

Per Assembly Bill 1397 and as stated in the Site Inventory Guidebook (Part B, page 11), sites that were used in the previous Planning Periods' Housing Elements are required to satisfy certain conditions to be designated for lower-income units in the current Planning Period's Site Inventory. Any non-vacant sites included in the 5th Cycle Housing Element and any vacant sites included in both the 4th and 5th Cycle Housing Elements must meet the following criteria to be eligible to be counted toward the City's lower-income housing capacity, the following must apply:

- The sites must be designated in the Site Inventory (Appendix C); and
- Page 12 of the HCD Housing Element Site Inventory Guidebook also requires that if sites have been used in previous housing elements, the Housing Element must include *"a program in the housing element requiring rezoning within 3 years of the beginning of the Planning Period to allow residential use by right at specified densities (see Step 2) for housing developments in which at least 20% of the units are affordable to lower-income households. This program can be an overlay on these specific sites. Please be aware that this requirement intends to further incentivize the development of housing on sites that have been available over one or more Planning Periods. The application of the requirement should not be used to further constrain the development of housing. As such, housing developments that do not contain the requisite 20% would still be allowed to be developed according to the underlying (base) zoning but would not be eligible for "by right" processing. However, the jurisdiction would have to make findings on the approval of that project under the No Net Loss Law (Government Code section 65863) and proceed to identify an alternative site or sites under that law. Sites where zoning already permits residential "use by right" as outlined in Government Code section 65583.2 (i) at the beginning of the Planning Period would be considered to meet this requirement."*

HCD defines "use by right" as meaning:

- The jurisdiction shall not require a conditional use permit.
- The jurisdiction shall not require a planned unit development permit.
- The jurisdiction shall not require 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).
- The jurisdiction may provide that "use by right" does not exempt the use from design review. However, that design review shall not constitute a "project" for purposes of Division 13 (commencing with Section 21000) of the Public Resources Code. Use by right for all rental multifamily residential housing shall be provided by subdivision (f) of Section 65589.5.

7.5.1.2 Non-Vacant, Lower-Income Sites Used in a Previous Planning Period

The 6th Cycle Site Inventory does not include any non-vacant sites identified in previous Housing Element cycles with very low and/or low-income units.

7.5.1.3 Non-Vacant, Moderate or Above Moderate Sites Used in a Previous Planning Period

Sites 16, 21, and 22 in the 6th Cycle Site Inventory were also identified in the 5th Cycle Housing Element Site Inventory. ***All three sites are non-vacant and have been designated for moderate and above moderate-income units***. Because none of the sites designated for lower-income units were in the 5th Cycle Site Inventory, they are not subject to the requirements applicable to sites used in previous periods' Housing Elements.

In addition to the Site Inventory table in Appendix C, Table 7-10, Site Summary and Suitability of Lower-Income Sites, shows the non-vacant sites that were previously included in the 5th Cycle Housing Element (See Sites 16, 21, and 22).

7.5.2 Zoning Appropriate to Accommodate Low- and Very Low-Income RHNA

The HCD Site Inventory Guidebook restricts the designation of sites for lower-income units to properties allowing at least 30 units per acre (for a "jurisdiction in a metropolitan county," the designation that applies to the City).

All lower-income sites are identified in Table 7-10, Site Summary and Suitability of Lower-Income Sites. The Site Inventory identifies 994 total potential lower-income housing units on 14 sites that are suitable for lower-income housing development, based on the criteria established by State law and HCD with special considerations described below:

- All the lower-income units are currently attributed to sites zoned for Commercial (C), Planned Development (PD), and Transit Oriented Development (TOD).
- Sites zoned for Commercial (C) do not specifically allow for residential development without a Conditional Use Permit (CUP). Similarly, Planned Development (PD) zoning does not have specific density allowances for residential developments but allows for any use consistent with the Millbrae General Plan to be permitted.
- However, all lower-income sites except two were rezoned to Corridor Mixed Use (CMU) or Residential Mixed Use (RMU) through either the DECRSP or as part of a pending or approved development project. Sites 2 and 18 both have pending or approved residential development projects and are not slated for rezoning - Site 2 will remain Commercial (C) and Site 18 will remain Planned Development (PD).
- Transit Oriented Development (TOD) sites allow for up to 80 units per acre without a minimum density.

More specifically, the following provides details on the previous and existing zoning for all lower-income sites:

- **Seven (7) of the 14 lower-income sites were zoned for Commercial use.** (Sites 2, 5, 6, 8, 13, 14, and 24). **Six of these seven** (Sites 5, 6, 8, 13, 14, and 24) **were rezoned as Corridor Mixed Use (CMU) through the DECRSP, allowing for a density of up to 130 units per acre. In addition, three of the seven lower-income sites have pending or approved projects including lower-income units and the developer obtained a CUP due to the Commercial zoning designation.**

  Site 8 has an *approved* development project where the developer obtained a CUP which demonstrates that the City's CUP process does not present a constraint to housing development, even affordable housing development). The remaining two sites zoned for Commercial have approved development projects – one is undergoing a zone change and one is an SB 35 project. More detail is provided below:

  - **Site 2** is currently *an approved pipeline* project that includes 99 multifamily units (49 low-income, 50 above moderate). This project qualifies for SB 35 streamlining in which a CUP cannot be required.

- **Site 6** is currently an *approved* pipeline project that includes 376 units (19 very low, 357 above moderate). This project is currently undergoing a zone change to Corridor Mixed Use (CMU) with a maximum density of 130 units per acre and a minimum density of 70 units per acre.
- **Site 8** is currently an *approved* pipeline project that includes 278 units (26 very low, 252 above moderate). This project was approved through a CUP and is currently undergoing a zone change to Corridor Mixed Use (CMU)with a maximum density of 130 units per acre and a minimum of 70 units per acre.

- **Four (4) of the 14 lower-income sites were zoned for Planned Development (PD)** (Sites 7, 9, 10, and 11) which allows developers to adopt any use consistent with the Millbrae General Plan. However, these sites were rezoned through the DECRSP in the following manner:
  - **Sites 7 and 9** were rezoned to Residential Mixed Use (RMU) with a maximum density of 80 units per acre and a minimum of 60 units per acre.
  - **Sites 10 and 11** were rezoned Corridor Mixed Use (CMU) with a maximum density of 130 units per acre and a minimum density of 70 units per acre.
- **The three (3) remaining lower-income sites (of the 14) are zoned Transit Oriented Development (TOD)** (Sites 17, 18, and 19) **and all have approved or proposed residential projects that include lower-income units** consisting of the following:
  - **Site 17** is currently an *approved* pipeline project that includes up to 488 units (49 low-income, 24 moderate-income, and 415 above moderate).
  - **Site 18** is currently ***in review*** for a proposed project that includes 30 units (3 low-income, 27 above moderate).
  - **Site 19** is currently a *built* project and includes 79 units (24 very low-income, 55 low-income).

The City adopted the DECRSP on December 1, 2022. Program HIP-17 will ensure that all lower-income sites in the DECRSP are zoned to allow at least 30 units per acre, as required by State law. Bringing these sites into compliance will ensure that all 6th Cycle Site Inventory sites comply with this requirement.

Details on lower-income sites are available in the Site Inventory table in Appendix C, as well as Table 7-10 below.

Table 7-10. Site Summary (All Sites) and Suitability of Lower-Income Sites

Site No.	Stat.	Address	APN	Area (ac)	Previous		Existing		Density Realism[2]	# of Units					Existing Use	Bldg. Age	5th Cycle Non-Vacant Site?[3]	I:LV Ratio	Reasons for Selection	Method of Affordability
					Zon.	Max Den.[1]	Zon.	Max Den.		VLI	LI	Mod.	Above Mod.	Total						
SITES WITH LOWER AND MODERATE INCOME UNITS																				
1	Opp.	1395 El Camino Real	021-278-010	0.60	C	N/A	RMU	80	95%	-	-	45	-	45	Shopping Center	N/A	No	0.12	Rezoned to RMU (proposed max. density of 80 du/ac); I:LV ratio of 0.12; in Priority Development Area (PDA)[4]; Access to high-quality public transit, jobs, and services	N/A
2	IR	1301 Broadway	021-276-330	0.67	C	N/A	Same as Previous	N/A	N/A	-	49	-	50	99	Dental Office	N/A	No	0.02	Pipeline project undergoing review	Density Bonus
3	Opp.	1201 El Camino Real	021-291-020	0.54	C	N/A	RMU	80	95%	-	-	40	-	40	Tire Shop	N/A	No	0.18	Rezoned to RMU(proposed max. density of 80 du/ac); I:LV ratio of 0.18; 50% parking lot; In PDA; Access to high-quality public transit, schools, jobs, and services	N/A
4	Opp.	1121 El Camino Real; 1125 El Camino Real	021-292-030, 021-292-070	1.12	C	N/A	RMU	80	95%	-	-	84	-	84	Tire Shop, Shopping Center	N/A	No	0.86	Rezoned to RMU (proposed max. density of 80 du/ac); I:LV ratio of 0.86; 40% parking lot; in PDA; Access to high-quality public transit, schools, jobs, and services	N/A
5	Opp.	1150 El Camino Real	021-324-310	0.55	C	N/A	CMU	130	85%	61	-	-	-	61	Parking Lot	N/A	No	0.24	Rezoned to CMU(proposed max. density of 130 du/ac); I:LV ratio of 0.24; 100% parking lot; in PDA; Access to high-quality public transit, schools, jobs, and services	N/A
6	App.	1100 El Camino Real	021-324-320	5.50	C	N/A	CMU	130	53%	19	-	-	357	376	Motel	N/A	No	2.32	Approved for development	Inclusionary Housing; Density bonus
7	Opp.	979 Broadway	021-362-310	1.11	PD	N/A	RMU	80	95%	11	-	73	-	84	Shopping Center	N/A	No	0.82	Rezoned to RMU(proposed max.density of 80 du/ac); I:LV ratio of 0.82; on Loopnet for lease; in PDA; Access to high-quality public transit, schools, jobs, and services	N/A
8	App.	959 El Camino Real	021-364-080	1.81	C	N/A	CMU	130	118%	26	-	-	252	278	Former Retail, Vacant	N/A	No	1.95	Approved for development	Density Bonus
9	Opp.	West of Magnolia Ave. and Library Ave.	021-420-220	3.11	PD	N/A	RMU	80	95%	50	38	60	88	236	Parking Lot	N/A	No	0.06	Rezoned to RMU (proposed max. density of 80 du/ac); I:LV ratio of 0.06; 100% parking lot; Property owner interest in redevelopment; in PDA; Access to high-quality public transit, schools, jobs, and services	N/A

Table 7-10. (Continued)

Site No.	Stat.	Address	APN	Area (ac)	Previous		Existing		Density Realism[2]	# of Units					Existing Use	Bldg. Age	5th Cycle Non-Vacant Site?[3]	I:LV Ratio	Reasons for Selection	Method of Affordability
					Zon.	Max Den.[1]	Zon.	Max Den.		VLI	LI	Mod.	Above Mod.	Total						
SITES WITH LOWER AND MODERATE INCOME UNITS																				
10	Opp.	537 Broadway	021-420-110	5.63	PD	N/A	CMU	130	85%	110	65	-	449	624	Shopping Center	N/A	No	2.45	Rezoned to CMU (proposed max. density of 130 du/ac); Property owner interest in redevelopment; in PDA; Access to high-quality public transit, schools, jobs, and services	N/A
11	Opp.	FALSE	021-420-130	2.20	PD	N/A	CMU	130	85%	80	40	-	124	244	Parking Lot	N/A	No	0.05	Rrezoned to CMU (proposed max. density of 130 du/ac); I:LV ratio of 0.05; 100% parking lot; Property owner interest in redevelopment; in PDA; Access to high-quality public transit, schools, jobs, and services	N/A
13	Opp.	450 El Camino Real; 460 El Camino Real	024-123-190, 024-123-200	0.88	C	N/A	CMU	130	85%	85	12	-	-	97	Storage Facility	N/A	No	0.04	Rezoned to CMU (proposed max. density of 130 du/ac); I:LV ratio of 0.04; 50% parking lot; in PDA; Access to high-quality public transit, schools, jobs, and services	N/A
14	Opp.	400 El Camino Real; 420 El Camino Real	024-123-130, 024-123-140	0.84	C	N/A	CMU	130	85%	92	-	-	-	92	Parking Lot, Fast Food	N/A	No	0.44	Rezoned to CMU (proposed maximum density of 130 du/ac); I:LV ratio of 0.44; 75% parking lot; in PDA; Access to high-quality public transit, schools, jobs, and services	N/A
17	App.	150 Serra Ave.	024-154-460, 024-337-010, 024-337-080, 024-337-090	3.60	TOD	80	Same as Previous	80	169%	-	49	24	415	488	Commercial Buildings	N/A	No	0.25	Approved for development	Development Agreement; Inclusionary Housing
18	IR	130-140 El Camino Real	024-335-150	0.23	TOD	80	Same as Previous	80	164%	-	3	-	27	30	Medical Office	N/A	No	0.21	Pipeline project undergoing review	Density Bonus
19	Built	300 Millbrae, Bldg. 6A	024-181-080	0.54	TOD	80	Same as Previous	80	183%	24	55	-	-	79	Parking Lot	N/A	No	0.00	Approved for development	Deed Restriction
20	Built	300 Millbrae, Bldg. 5B	024-180-350	2.68	TOD	80	Same as Previous	80	149%	-	-	20	300	320	Parking Lot	N/A	No	0.67	Approved for development	Deed Restriction

Table 7-10. (Continued)

Site No.	Stat.	Address	APN	Area (ac)	Previous		Existing		Density Realism[2]	# of Units					Existing Use	Bldg. Age	5th Cycle Non-Vacant Site?[3]	I:LV Ratio	Reasons for Selection	Method of Affordability
					Zon.	Max Den.[1]	Zon.	Max Den.		VLI	LI	Mod.	Above Mod.	Total						
SITES WITH LOWER AND MODERATE INCOME UNITS																				
21	Opp.	39 El Camino Real	024-334-150	0.57	RMU	60	Same as Previous	60	95%	-	-	32	-	32	Inactive Retail	N/A	Yes - Mod. Income Only	0.50	Currently zoned RMU (Existing max. density of 60 du/ac); I:LV ratio of 0.50; 50% parking lot; Theater for sale and at least 2 vacancies in center; Access to high-quality public transit	N/A
22	Opp.	15 El Camino Real; 9 El Camino Real	024-334-020, 024-334-030	0.61	RMU	60	Same as Previous	60	95%	-	-	34	-	34	Shopping Center	N/A	Yes - Mod. Income Only	0.39	Currently zoned RMU (existing max. density of 60 du/ac); I:LV ratio of 0.39; 35% parking lot; on Loopnet for lease; Access to high-quality public transit	N/A
24	Opp.	95 Murchison Dr.	024-344-090	3.10	C	N/A	CMU	130	85%	80	45	-	219	344	Grocery Store	N/A	No	0.79	Rezoned to CMU (proposed max. density of 130 du/ac); I:LV ratio of 0.79; 50% parking lot; in PDA; Access to high-quality public transit, schools, jobs, and services	N/A
TOTAL UNITS - SITES WITH LOWER AND MODERATE INCOME UNITS										**638**	**356**	**412**	**2,281**	**3,687**						

Source: *City of Millbrae*

Table 7-10. (Continued)

Site No.	Stat.	Address	APN	Area (ac)	Previous		Existing		Density Realism[2]	# of Units					Existing Use	Bldg. Age	5th Cycle Non-Vacant Site?[3]	I:LV Ratio	Reasons for Selection	Method of Affordability
					Zon.	Max Den.[1]	Zon.	Max Den.		VLI	LI	Mod.	Above Mod.	Total						
SITES WITH ABOVE MODERATE INCOME UNITS ONLY																				
12	App.	480 El Camino Real	021-314-100	0.13	C	N/A	CMU	130	53%	-	-	-	9	9	Parking Lot	N/A	No	0.00	Approved for development	N/A
15	IR	300 El Camino Real	024-154-240	0.12	C	N/A	CMU	130	93%	-	-	-	14	14	Restaurant	N/A	No	4.93	Pipeline project undergoing review	N/A
16	IR	230 Broadway	024-152-180	0.05	DIA	N/A	DMU	50	200%	-	-	-	5	5	Two-Story (First Story Retail, Second Story Residential)	N/A	Yes - Mod. Income Only	0.33	Pipeline project undergoing review	N/A
23	App.	450 Chadborne	024-275-120	0.63	R-1	8.71	Same as Previous	8.712	18%	-	-	-	1	1	Church With One Residential Unit	N/A	No	5.42	Approved for development - Approved unit will be in addition to the existing unit and will not replace it	N/A
25	App.	842 Clearfield	021-442-090	0.11	R-1	8.71	Same as Previous	8.712	100%	-	-	-	1	1	Vacant Lot	N/A	No	0.00	Approved for development	N/A
26	App.	990 Larkspur	021-210-280	0.09	R-1	8.71	Same as Previous	8.712	128%	-	-	-	1	1	Vacant Lot	N/A	No	0.00	Approved for development	N/A
TOTAL UNITS - ABOVE MODERATE INCOME UNITS										**0**	**0**	**0**	**31**	**31**						
ADUS (Projection)										**34**	**34**	**33**	**11**	**112**						
TOTAL UNITS (ALL SITES, ADUs AND INCOME LEVELS)										**672**	**390**	**445**	**2,323**	**3,830**						
RHNA										**575**	**331**	**361**	**932**	**2,199**						
Difference/Buffer										**97**	**59**	**84**	**1,391**	**1,631**						
% Buffer										**17%**	**18%**	**23%**								

Legend:

Sites with proposed and approved projects in the pipeline

Status: IR = In Review, App. = Approved, Opp. = Opportunity

Zoning: R-1 = Single Family Residential, DIA = Downtown Improvement Area, C = Commercial, RMU = Residential Mixed Use, TOD = Transit Oriented Development, PD = Planned Development, DMU = Downtown Mixed Use, Same = Same as Existing

Footnotes:

[1] Commercial (C) zoning does not allow for residential development. However, developers can have a residential project approved by using a Conditional Use Permit (CUP). In addition, Planned Development (PD) designations do not have specific density allowances for residential developments. However, the City allows for any use consistent with the Millbrae General Plan to be permitted, provided such use exists and it is approved by City Council. Finally Downtown Improvement Area (DIA) does not allow for residential development. However, developers can have a residential units approved by using a CUP.

[2] For pending and entitled developments, "Density Realism" is based on the proposed development. For other sites, "Density Realism" is an assumption based on realized density of recent and proposed developments.

[3] Per state law, this determination is only pertinent if a site from a previous Housing Element is designated for lower income unit in the current Housing Element The sites found in the 5th Cycle Sites Inventory were only designated for moderate income units.

[4] Priority Development Areas (PDAs) are areas designated by the Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC) as sites that feature access to high-quality public transit job centers, shopping districts, schools, and other services.

Source: *City of Millbrae*

7.5.3 Size of Sites

The HCD Site Inventory Guidebook restricts the designation of sites for lower-income units to sites that are between 0.5 and 10 acres in size. **All lower-income opportunity sites (i.e., lower-income sites without a pending or approved development project) meet this requirement.** Thirteen of the 14 sites with lower-income units designated satisfy the following requirements:

- Have a minimum parcel size of 0.5 acres and a maximum parcel size of 9.99 acres.
- **The remaining site (Site 18) is a 0.23-acre site and is under review.**

All lower-income sites comply with the size requirements provided by HCD. Details on lower-income sites are available in the Site Inventory table, in Appendix C.

7.6 Housing Capacity Analysis/Past Housing Production

To assess future development likelihood, the City reviewed recent developments. This review illuminates housing development interest and viability, particularly in the City's downtown area.

7.6.1 5th Cycle Housing Production, Density, and Realistic Capacity

7.6.1.1 5th Cycle Housing Production

During the 5th Cycle Housing Element Planning Period, the City issued building permits for 458 residential units, summarized in Table 7-11, 2015–2022 Housing Units with Issued Permits by Affordability. Of the permitted units, 147 (or 32% of the total) are rent- and income-restricted, with approximately 9% of all permitted units at the very low-income level, approximately 15% at the low-income level, and approximately 8% at the moderate-income level.

Table 7-11. 2015–2022 Housing Units with Issued Permits by Affordability

Income Levels	2015	2016	2017	2018	2019	2020	2021	2022	Total Units[1]
Very Low	0	0	0	0	5	2	30	4	**41**
Low	0	0	0	0	5	1	60	4	**70**
Moderate	0	0	0	0	4	22	6	4	**36**
Above Moderate	0	0	0	0	4	303	2	2	**311**
Total Units[2]	**0**	**0**	**0**	**0**	**18**	**328**	**98**	**14**	**458**

[1] The total units permitted during the 5th Cycle Planning Period shown in this table do not correspond with the completed developments in Table 7-5, as Table 7-5 represents a different time period for completed developments, rather than permits issued. Please see Table 7-3 for information on approved projects and projects under review.

[2] As shown in Table 7-6, a total of 42 ADUs were permitted during the 5th Cycle Planning Period. The remaining 402 units consist of 400 units (79 lower, 21 moderate, and 300 above moderate income) for the Gateway Village project, and two single family homes.

Source: City of Millbrae, 2018-2022 Annual Progress Reports

7.6.1.2 High-Density – Pending, Approved, and Completed Projects

There have been four high-density residential or mixed-use developments built in the City since 2007, mainly in the MSASP. In addition, the City anticipates the development of 13 new residential projects, of which 10 are multifamily residential. Table 7-12, Proposed and Recently Built Development Projects, includes all of the proposed and development projects in the last 15 years. In addition, Table 7-12 includes the average **percentages representing the actual density** as compared to the allowed density:

- Residential Mixed Use (RMU) - 57 or 76 units per acre, or 95% of the current permitted density of 60 units per acre in the MSASP area and 80 units per acre in the DECRSP area, correspondingly, respectively.
- Corridor Mixed Use (CMU) – 110 units per acre, or 85% of the current permitted density of 130 units per acre.

In addition, the City averaged an approval of the following average units under the following zoning designations (note that all pipeline projects except R-1 will be rezoned):

- Commercial (C) - 97 units/acre (does not permit residential/occurs through CUP).
- Downtown Mixed Use (DMU) – 100 units/acre.
- Single Family Residential (R-1) - 7 units/acre.

- Transit Oriented Development (TOD) - 131 units/acre.

It is important to note that while Commercial (C) zoning does not include density allowances for residential units, the City has approved projects through the CUP process, providing evidence that the City's CUP process does not represent a constraint to housing development. However, to continue to encourage and facilitate housing development, the City is rezoning sites with these zoning types to Corridor Mixed Use (CMU) and Residential Mixed Use (RMU) zoning, which allow for residential development, through the adoption of the DECRSP. Program HIP-16 in Chapter 8, Housing Plan, provides the tool for this rezoning to happen.

The trend of high-density residential developments is likely to continue in the City. As shown in Table 7-12, a comparison of developments under construction, approved, or under review shows that they are similar in size and density to their recently constructed counterparts (only 3 of the 13 proposed sites are single-family developments). Furthermore, the 13 sites currently in the pipeline include six developments with affordable housing, illustrating the financial feasibility of affordable and market-rate housing in the City and the desirability of Millbrae to developers. In addition, Table 7-12 shows that most proposed developments are estimated to be completed by 2026; Within the 6th Planning Cycle. In addition, Table 7-12 includes the affordability methods (e.g., density bonus, deed restriction, etc.) for each of the affordable proposed projects. Overall, Table 7-12 and Table 7-13 demonstrate that affordable housing at high densities is not only happening in the City but in the region as well.

Table 7-4 (earlier in this Chapter) presents information on each of the 13 sites, including a unit breakdown for each, along with an estimate of the maximum rent for affordable units. This rent estimate was performed under Health and Safety Code Section 50053, which prescribes the methodology used by HCD to calculate affordable rent limits. This methodology involves calculating the product of 30% times the income level percentage (i.e., 50% for very low-, 60% for low-, and 110% for moderate-income households) of the area median income, adjusted for family size appropriate for the unit.

Table 7-12. Proposed and Recently Built Development Projects

Site No.	Pipeline / Built	SP	Project Name / Address	Description	Area (ac)	Previous		Existing			Real. FAR	Real. FAR as % of Perm. FAR	Yr. Built / Appr	Est. Comp. Yr.	I:LV Ratio	# Units Comp	# of Units Appr / Pending	Total	Income Category					Afford. Method	Real. Den. (du/ac)	Real. Den. as % of Perm. Den
						Zoning	Max Den	Zoning	Max Den	Max FAR									VL	Low	Mod	Above Mod	Total			
COMMERCIAL (C)																										
2	Pipeline	N/A	1301 Broadway	Proposal for new residential development to contain 120 dwelling units in Commercial zone	0.7	Commercial (C)	N/A	Same as Previous	N/A	3.0	3.9	128%	2023	2026	0.02		99	99	0	49	0	50	99	Density Bonus	147	N/A
	Built	DECRSP	30 Hermosa	9 residential condo units	0.19	Commercial (C)	N/A	N/A	N/A	3.5	1.8	53%	2016	Built	N/A	9		9	0	0	0	9	9	N/A	47	N/A
COMMERCIAL (C) SUBTOTALS					**0.9**		**0**		**0**	**3.3**	**2.8**	**88%**				**9**	**99**	**108**							**97**	**N/A**
CORRIDOR MIXED USE (CMU)																										
6	Pipeline	DECRSP	Anton Residential*: 1100 El Camino Real	Proposal to demolish all existing structures and construct a new five-story, 384 unit, multi-family apartment community in R-3 zone	4.35	Commercial (C)	N/A	Corridor Mixed Use (CMU)	130	3.5	2.7	76%	2022	2026	2.32		376	376	19	0	0	357	376	Inclusionary Housing; Density bonus	87	67%
8	Pipeline	DECRSP	959 El Camino Real	Mixed use development with ground floor commercial and amenity space and 278 dwelling units in upper stories in Commercial zone.	1.80	Commercial (C)	N/A	Corridor Mixed Use (CMU)	130	3.5	4.4	125%	2022	2025	1.95		278	278	26	0	0	252	278	Density Bonus	155	119%
12	Pipeline	DECRSP	480 El Camino Real	9-unit mixed use development with ground floor commercial	0.12	Commercial (C)	N/A	Corridor Mixed Use (CMU)	130	3.5	2.3	65%	2020	2025	0.00		9	9	0	0	0	9	9	N/A	75	58%
15	Pipeline	DECRSP	300 El Camino Real	Tai Wu Restaurant, 30% Parking Lot, Older Building - Well Kept, Active Business	0.12	Commercial (C)	N/A	Corridor Mixed Use (CMU)	130	3.5	2.8	81%	In Review	TBD	4.93		14	14	0	0	0	14	14	N/A	122	94%
CORRIDOR MIXED USE (CMU) SUBTOTALS					**6.4**		**0**		**130**	**3.5**	**3.0**	**87%**				**-**	**677**	**677**							**110**	**85%**
DOWNTOWN MIXED USE (DMU)																										
16	Pipeline	DECRSP	230 Broadway	Addition of 6 residential units to existing commercial building in Downtown Improvement Area	0.05	Downtown Improvement Area (DIA)	N/A	Downtown Mixed Use (DMU)	50	3.5	2.6	74%	In Review	TBD	0.33		5	5	0	0	0	5	5	N/A	100	200%
DOWNTOWN MIXED USE (DMU) SUBTOTALS					**0.1**		**0**		**50**	**3.5**	**2.6**	**74%**				**-**	**5**	**5**							**100**	**200%**

Table 7-12. (Continued)

Site No.	Pipeline / Built	SP	Project Name / Address	Description	Area (ac)	Previous		Existing			Real. FAR	Real. FAR as % of Perm. FAR	Yr. Built / Appr	Est. Comp. Yr.	I:LV Ratio	# Units Comp	# of Units Appr / Pending	Total	Income Category					Afford. Method	Real. Den. (du/ac)	Real. Den. as % of Perm. Den
						Zoning	Max Den	Zoning	Max Den	Max FAR									VL	Low	Mod	Above Mod	Total			
RESIDENTIAL MIXED USE (RMU)																										
	Built	MSASP	88 South Broadway	105 unit condominium	2.30	Residential Mixed Use (RMU)	60	N/A	60	2.5	2.0	80%	2007	Built	N/A	105		105	0	1	10	94	105	Inclusionary Housing	46	76%
	Built	MSASP	120 S El Camino Real	54 residential units and 10 commercial units	0.86	Residential Mixed Use (RMU)	60	N/A	60	2.0	2.6	131%	2012	Built	N/A	54		54	1	1	0	52	54	#N/A	63	105%
	Built	MSASP	151 El Camino Real	142 residential units on mixed use building	1.75	Residential Mixed Use (RMU)	60	N/A	60	2.5	1.9	77%	2010	Built	N/A	142		142	0	0	0	142	142	N/A	81	135%
RESIDENTIAL MIXED USE (RMU) SUBTOTALS					**4.9**		**60**		**60**	**2.3**	**2.2**	**94%**				**301**	**-**	**301**							**63**	**105%**
SINGLE FAMILY RESIDENTIAL (R-1)																										
23	Pipeline	N/A	450 Chadborne	New unit	0.63	Single Family Residential (R-1)	8.7	Same as Previous	8.7	0.9	0.8	91%	2019	TBD	5.42		1	1	0	0	0	1	1	N/A	2	18%
25	Pipeline	N/A	842 Clearfield	New single family residence	0.11	Single Family Residential (R-1)	8.7	Same as Previous	8.7	0.6	0.8	149%	2021	2024	0.00		1	1	0	0	0	1	1	N/A	9	100%
26	Pipeline	N/A	990 Larkspur	New single family residence	0.09	Single Family Residential (R-1)	8.7	Same as Previous	8.7	0.6	3.1	567%	2022	2026	0.00		1	1	0	0	0	1	1	N/A	11	128%
SINGLE FAMILY RESIDENTIAL (R-1) SUBTOTAL					**0.8**		**8.71**		**8.71**	**0.7**	**1.6**	**239%**				**-**	**3**	**3**							**7**	**82%**
TRANSIT ORIENTED DEVELOPMENT (TOD)																										
18	Pipeline	MSASP	130-140 El Camino Real	30 units mixed use building	0.23	Transit Oriented Development (TOD)	80	Same as Previous	80	2.5	3.8	150%	In Review	2025	0.21		30	30	0	3	0	27	30	Density Bonus	131	164%
19	Built	MSASP	300 Millbrae, Bldg. 6A	Bldg. 6A Veterans preference affordable housing	0.54	Transit Oriented Development (TOD)	80	Same as Previous	80	2.5	2.6	102%	Built	Built	0.00	79		79	24	55	0	0	79	Deed Restriction	146	183%
20	Built	MSASP	300 Millbrae, Bldg. 5B	Bldg. 5B	2.68	Transit Oriented Development (TOD)	80	Same as Previous	80	2.5	2.8	113%	Built	Built	0.67	320		320	0	0	20	300	320	Deed Restriction	119	149%
TRANSIT ORIENTED DEVELOPMENT (TOD) SUBTOTALS					**3.4**		**80**		**80**	**2.5**	**3.0**	**122%**				**-**	**30**	**30**							**132**	**165%**

Source: *City of Millbrae Site Inventory*

Both the MSASP and the DECRSP will likely see similarly high densities in the future, as they play a vital role in the development of Millbrae's new economic center featuring transit–oriented developments and are positioned in and around the Intermodal Station. The adoption and Implementation of the MSASP and DECRSP encourage the achievement of higher-density mixed-use redevelopment. Table 7-12 provides a list of high-density residential projects in the City that are completed, under construction, or approved.

7.6.2 Housing Potential Assumptions – General

Sites with a proposed development are included if the developer:

- Has either applied and/or received entitlement approval or has expressed interest in developing a site; and
- Is expected to receive a permit or certificate of occupancy after the beginning of the City's RHNA Projection Period (i.e., June 30, 2022).

In these cases, projected site densities are based on owner-proposed development densities. Recent development trends in the City were analyzed to determine a realistic density for opportunity sites. Table 7-12 summarizes the analysis of recent high-density developments in the City.

For opportunity sites (those without a currently proposed development), projected densities were estimated using a combination of several factors that are dependent on a site's unique characteristics, including:

- The site's ownership and projected development scenario;
- Whether the site is constrained by environmental conditions; and
- The size of the site.

In addition to these factors, the City applied a Realistic Capacity Factor to all sites without a currently proposed development. The methodology utilized for the factors listed above is as follows:

- An Acreage Factor focused on lower-income sites.
    - Thirteen of the 14 sites with lower-income units are between 0.5 and 10 acres in size. The one exception is Site 18, a 0.23-acre site. However, the City is reviewing an application for the development of 30 units at an allowable density of 130 units per acre.

- A Floor Area Ratio Factor for all sites.
    - As shown in Table 7-12, the average realized floor area as a percentage of the allowable floor area ranges between 74% and 239% for C, CMU, DMU, RMU, R-1, and TOD-zoned developments. Using a rate when it ranges so widely can lead to inaccuracies, especially when there is a large difference between the minimum or maximum values. **Therefore, to remain conservative, the applied Floor Area Ratio Factor is 100% for all sites.**
- A Realistic Capacity Factor for all sites.
    - Although proposed projects show an ongoing trend of high-density developments and the approval of the DECRSP rezoned to allow for significantly higher densities, the City calculated the Realistic Capacity Factors by analyzing the proposed and recently built developments shown in Table 7-12. The City's analysis yielded the following Realistic Capacity Factors that were applied to the 6th Cycle Site Inventory opportunity sites:
        - **95% for all Residential Mixed Use (RMU): Developments built or proposed in Residential Mixed Use (RMU) zones since 2007 averaged 63 units per acre or 105% of the average.** RMU zoning currently allows for a density of 60 units per acre in the MSASP area and 80 units per acre in the DECRSP area. Table 7-12 illustrates this calculation.

          To remain conservative, the City applied a 95% realistic capacity factor, rather than 105%. Table 7-12 identifies three properties: 88 South Broadway, 120 S El Camino Real, and 151 El Camino Real with realistic capacity factors at 76%, 105%, and 135%, respectively. The 88 South Broadway property had a realistic capacity factor significantly lower than the other properties, thus reducing the average. However, 88 South Broadway was entitled 21 years ago in 2002, and built in 2007, making it unfit as a comparable due to substantial changes in the development market. Shifts in market demand, increased urbanization, land scarcity, technological advancements, improved infrastructure, updated zoning laws, and fluctuating economic factors have all contributed to distinct differences between a development entitled nearly a decade ago, and one entitled now. **Although, the recent developments with RMU zoning averaged a realistic capacity factor of 105%, the City applied a 95% realistic capacity factor.**
        - **85% for all Corridor Mixed Use (CMU):** While the City has not had any past developments completed in the Corridor Mixed Use (CMU) zones, the City rezoned

numerous properties as Corridor Mixed Use (CMU) through the DECRSP. **As shown in Table 7-12, it is important to note that the City has received four proposals for mixed-use projects with previous Commercial (C) zoning designations that have been rezoned to CMU. These projects averaged a density of 110 units per acre or 85% of the permitted density (Corridor Mixed Use (CMU) allows for 130 units per acre).** As evidenced by the proposed mixed-use projects, the adoption of the DECRSP is encouraging the development of higher-density, mixed-use zoning types. The proposal of these projects is evidence that rezoning and redevelopment through the DECRSP will result in the redevelopment of sites into high-density residential. Therefore, the City utilized the average densities to generate realistic assumptions used to estimate the unit capacity for the opportunity sites.

In addition to applying the factors listed above, the City considered the likelihood of nonresidential development. It is notable that for over 15 years, no new developments located in the City's Residential Mixed-Use district have consisted of only commercial uses. Therefore, the likelihood of any 100% non-residential developments is low. Furthermore, on-site and off-site improvements for projects are determined on a project-by-project basis. Some improvements required for recently approved projects include the installation of new sidewalks, curb and gutter, pavement restoration, water and sewer improvements, installation of intersection directional curb ramps, and installation of new bike lanes. However, these are typical safety improvements already accounted for in typical proformas because they are required by code. Examples of standard requirements include ADA access and water and sewer improvements to accommodate the new residents.

7.6.2.1 Environmental Constraints

As previously mentioned, projected densities were estimated using a combination of several factors that are dependent on a site's unique characteristics, including environmental constraints. As discussed in Appendix B, Millbrae is primarily exposed to environmental hazards that are common for all cities in the Bay Area, such as earthquakes, flood, landslides, and fire hazards. As shown in the below sections, **these environmental hazards do not represent a constraint to development in any of the proposed sites**.

7.6.2.1.1 Earthquake Exposure

The City of Millbrae is in the seismically active San Francisco Bay region, where earthquakes have historically represented a significant threat. There are four active faults in proximity to Millbrae. The greatest seismic risk is the San Andreas Fault, which is oriented northwest to southeast and lies within one mile of the western edge of the City limits. Further to the west of

the San Andreas Fault, the San Gregorio Fault enters San Mateo County from the Pacific Ocean at Half Moon Bay, approximately nine miles southwest of Millbrae.

Approximately 16 miles east of Millbrae, the Hayward Fault transects the eastern portion of the Bay Area just east of Oakland and Hayward. East and south of the Hayward Fault is the Calaveras Fault that runs from approximately the city of Danville to the south toward the city of Hollister as close as 26 miles east of Millbrae.

The California Department of Conservation published its California Earthquake Hazards Zone Application (CEHZ Application). This interactive map allows residents to find if their properties are exposed to seismic hazards. Although Millbrae is not directly located on top of a fault line (as shown in the CEHZ Application), it does have areas subject to liquefaction, in which the soil temporarily turns to quicksand and cannot support structure. Seven of the 26 sites are fully exposed to a liquefaction zone; This includes Sites 1, 12, 13, 14, 19, 20, and 24. It is important to note, though, that the seven sites have existing commercial developments and Site 12 is a pipeline project with an approved, 9-unit residential development. Furthermore, it is not unusual for developments to be built on liquefaction zones. This is made possible by state and local seismic codes. According to the City's Safety Element, **Millbrae requires geotechnical and geologic reviews of development proposals to assess potential seismic hazards and ensure that they are adequately mitigated.**

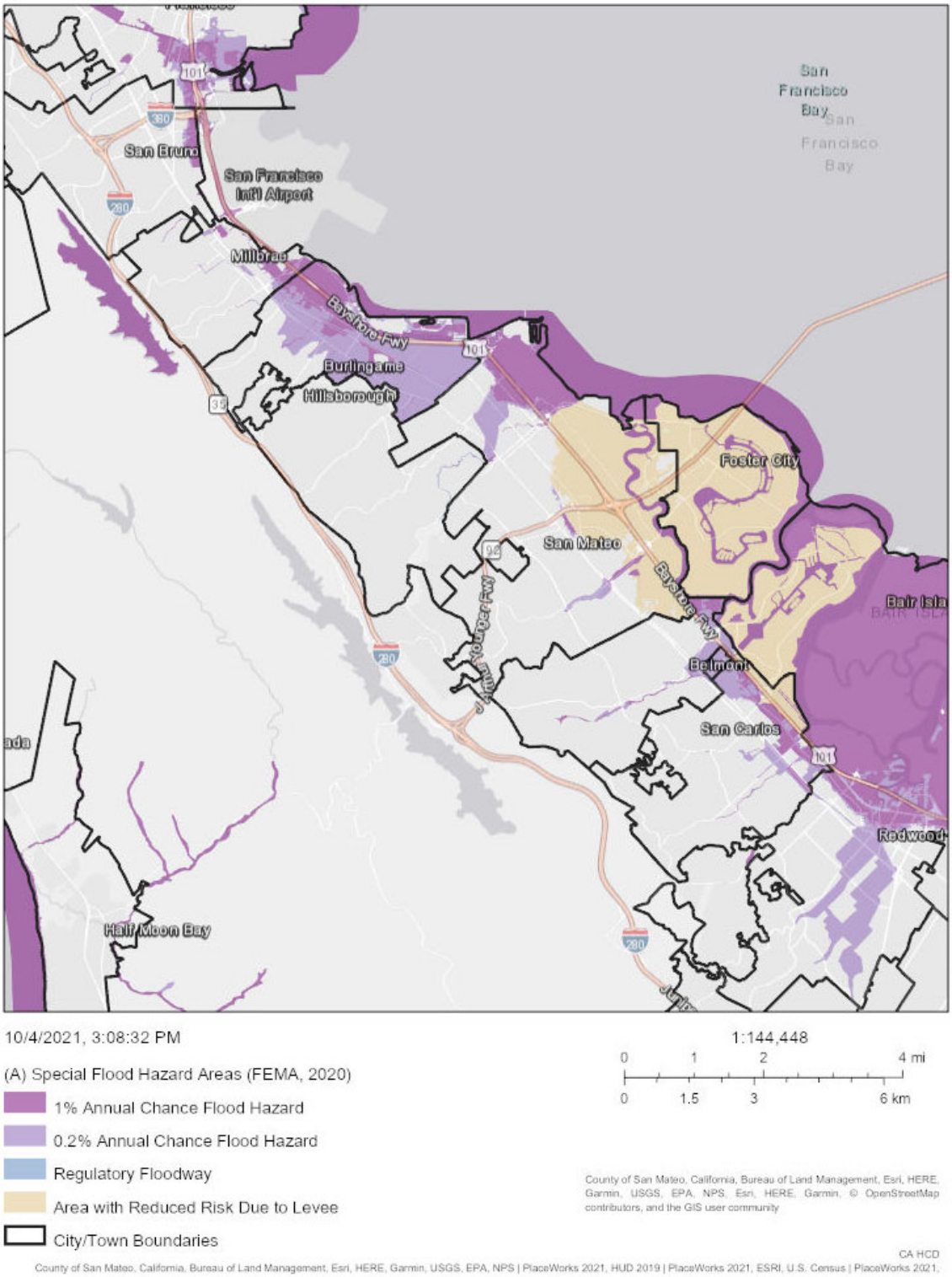
Furthermore, the City's Building and Safety Division requires all new buildings to meet the seismic requirements set forth by the California Building Code, which is updated every three years to reflect the latest advances in seismic safety. The Building and Safety Division also conducts regular inspections to ensure that buildings are constructed to these standards. Seismic damage to structures built in compliance with the Uniform Building Code would not likely cause a collapse of the structures but would instead result in nonstructural damage, such as breakage of windows, doors, piping, etc. **While the presence of liquefaction zones in the City presents certain risks, the City has taken a proactive approach to managing the risks and developers have not been discouraged from developing within the City's boundaries. As such, this is not a constraint to development.**

7.6.2.1.2 Flood Hazard Exposure

Additionally, some areas of the City along San Francisco Bay are included in the Special Flood Hazard Areas (Figure 7-4). **More specifically, five of the 26 sites in the Sites Inventory are located within the FEMA Special Flood Areas (Site Nos. 1, 9, 10, 19, and 20). Of these five sites, three (Site Nos. 1, 19, and 20) have a majority of the site within the Flood Area. However, it is important to note that Sites 19 and 20 are currently pipeline projects, demonstrating the feasibility of developing within the Flood Area with mitigation**

measures. The City's Climate Action Plan (2020) also sets forth mitigation efforts to address flooding through, "integrated regional planning, design, permitting, project implementation, and long-term operations and maintenance to create a resilient 'one shoreline' San Mateo County by 2100."

Figure 7-4. Special Flood Hazard Areas, 2000



Source: *California Department of Housing and Community Development AFFH Data Viewer*

7.6.2.1.3 Landslide Exposure

The geologic and topographic character of an area determines its potential for landslides. Steep slopes, the extent of erosion, and the rock composition of a hillside can aid in predicting the probability of slope failure. Although **Millbrae is not in a state-designated earthquake-induced landslide hazard zone,** the ABAG Resilience Program has identified past landslides in the steeper slopes throughout the western portion of the City. Recent landslide events in Millbrae occurred in the steeper slopes of the western portion of the City as a result of heavy rainfall. Sites 25 and 26 are located in the western portion of the City and are exposed to landslides. However, it is important to note that **both sites are currently pipeline projects, demonstrating the feasibility of developing within the landslide area with mitigation measures.**

The City's Safety Element has established multiple programs to mitigate these geologic and seismic hazards including, but not limited to, programs for:

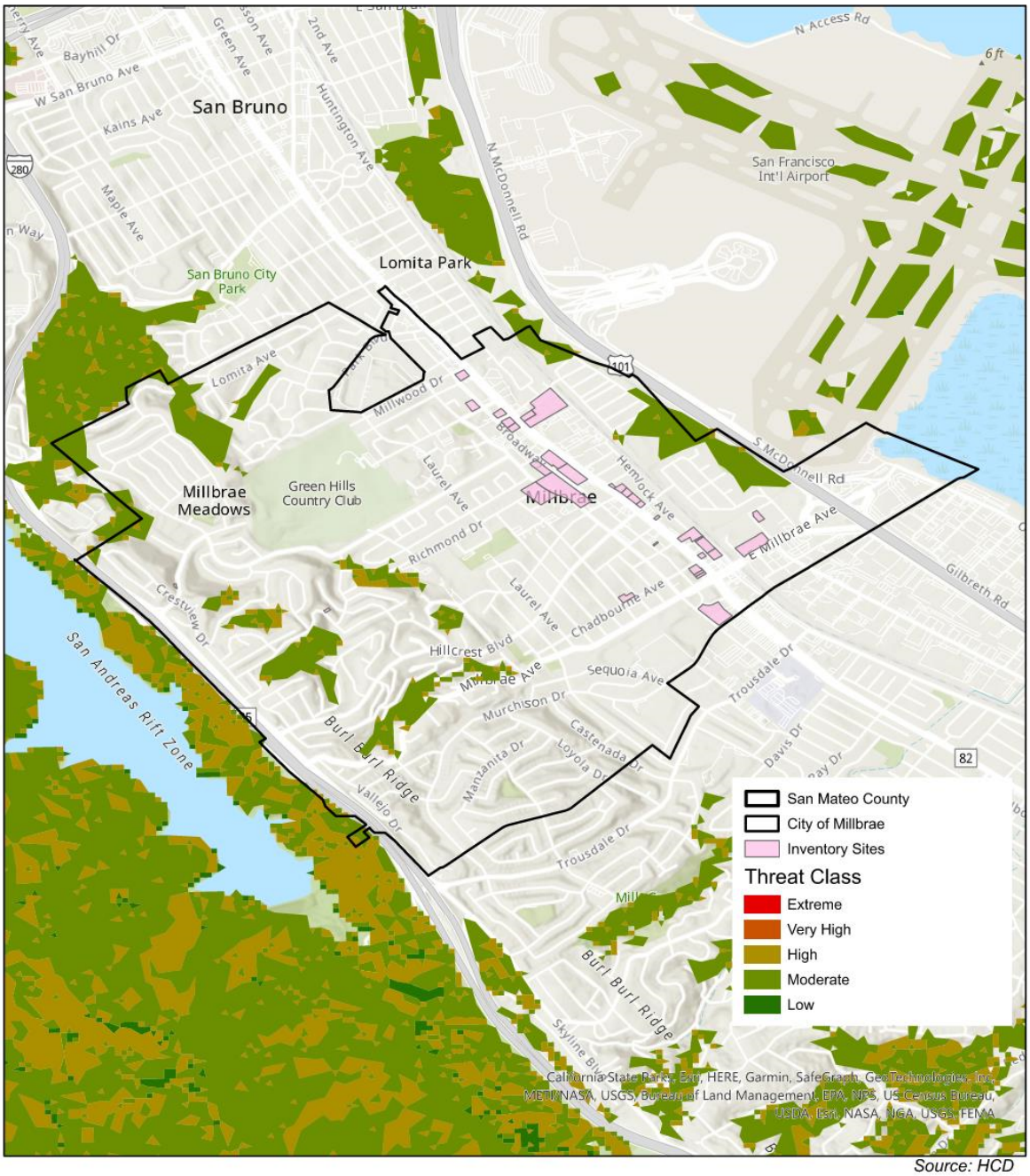
- Seismic Safety;
- Residential Seismic Upgrades;
- Seismic Modifications to Residential Facilities;
- Geotechnical and Structural Analysis for Steep Slopes; and
- Soil Stabilization

7.6.2.1.4 Fire Threat Exposure

The California Department of Forestry and Fire Protection (CAL FIRE) designates high-fire hazard zones in California based on several factors, including the potential for wildfire, the slope of the terrain, and the proximity to fuel sources like trees and vegetation. These high-fire hazard zones are subject to additional building codes and regulations to ensure that structures are designed and constructed to withstand wildfires.

All of the proposed sites in this Sites Inventory are located outside of the high-hazard zones designated by CAL FIRE (Figure 7-5). The City of Millbrae has taken a proactive approach to ensure that housing development is located in areas that are less prone to wildfire risk, which is particularly important in the wake of the devastating wildfires that have occurred in California in recent years.

Figure 7-5. CalFire Threat Levels



Source: HCD

Harris & Associates

N

0 0.5 1 Miles

CalFire Threat Levels

City of Millbrae Affirmatively Furthering Fair Housing

Source: *CalFire, City of Millbrae*

7.6.2.2 Other Possible Constraints

The City has identified several constraints that could affect the development of housing projects in the area. One potential constraint is the Airport Land Use Compatibility Plan, which is designed to ensure that new development does not create safety hazards for the San Francisco International Airport. However, the development standards for the new zoning in the Downtown and El Camino Real Specific Plan have already been reviewed by the Airport Land Use Committee, and the building heights in the new Specific Plan zoning do not conflict with the Airport Land Use Compatibility Plan. As a result, there were no revisions to the maximum heights, and **as long as projects comply with the height limits in the Specific Plan, the Airport Land Use Compatibility Plan would not be a constraint.** This information is based on the Millbrae Downtown and El Camino Real Specific Plan Draft Environmental Impact Report (DEIR) prepared by Rincon Consultants in August 2021.

Another potential constraint is the size of the lots available for redevelopment. While the City has adequate land for redevelopment, some properties may not be large enough to maximize the increased heights and densities in the Specific Plan area. In these instances, an assemblage of parcels may be needed. However, **the City has approved multi-family residential developments on lot sizes as small as 8,174 square feet (30 Via Hermosa, nine units – built in 2021) and 5,807 square feet (480 El Camino Real, nine units – approved)**.

Furthermore, a constraint has been identified for a housing unit on church property at 450 Chadborne. In this case, PG&E is requiring electrical upgrades to the church, which is an additional cost that was not anticipated.

Constraints of this kind can affect the development of housing projects in the area. **However, through careful planning and collaboration with regulatory agencies, the City has been able to address potential constraints such as the Airport Land Use Compatibility Plan. The City has also demonstrated a willingness to approve multi-family residential developments on smaller lot sizes, although an assemblage of parcels may be necessary in some cases. The city is also aware of unexpected costs such as electrical upgrades that may arise during the development process.**

7.6.2.3 Development Trends for Lower-income Units – Region

To understand the feasibility of affordable housing development in Millbrae, the City collected information on the development of 100% affordable developments in the region. Specifically, **the City analyzed privately owned (not publicly owned), non-vacant, commercial sites that were redeveloped into 100% affordable housing in San Mateo and Santa Clara Counties**

over the 5th Cycle Housing Element planning period (2015-2022). These are completed, 100% affordable housing projects (no market-rate units).

The City performed this analysis by reviewing the California Tax Credit Allocation Committee's (CTCAC) data on projects approved for funding. As shown in Table 7-13, Non-Vacant Commercial Sites Redeveloped Into Affordable Housing (2015-2022) – San Mateo and Santa Clara County, this analysis yielded the following conclusions:

- Since 2015, CTCAC has assisted **17 developers to build 100% affordable developments on privately-owned sites that replaced non-vacant, commercial sites** in San Mateo and Santa Clara Counties.
- All projects were 100% affordable housing units. **Of the 17 developments, 15 are exclusively affordable to lower-income households only (very low- and low-income households)**. Only two accommodated units for moderate-income units.
- The developments were **built on sites with previous retail, commercial, industrial, and office uses**:
    - ***Ten (10)*** of the 17 developments *were built on a parcel with a former retail building, including businesses that typically yield high earnings (e.g., auto dealers, Enterprise Rent-A-Car, and Taco Bell).*
    - **One (1)** of the 17 developments was *built on a parcel with a former industrial building*.
    - **Five (5)** of the 17 developments were *built on parcels with a former office building*.
    - **One (1)** of the 17 developments was *built on a parcel with a former commercial building* (more specific data not available).
- **All 17 developments were built on sites with commercial, mixed-use, industrial, or planned community zoning designations**.
- **The average density ranges between 95 -115,** depending on the method of calculation of the average. A simple average, which adds all the densities and divides them by the number of sites, results in a density of 115 units per acre. An average density calculated by adding the total units for all sites and dividing by the sum of the acreage for all sites yields an average density of 95 units per acre.
    - **To remain conservative, the City considered the 95 units per acre density** during the development of the Sites Inventory.

Overall, the findings of this analysis provide evidence of the following:

- Residential developments built on commercial properties are feasible in the region;

- Residential developments that are 100% affordable to a majority of lower-income households are feasible in the region; and
- High densities for 100% affordable housing built on commercial parcels are feasible in the region.

Table 7-13. Non-Vacant Commercial Sites Redeveloped Into Affordable Housing (2015-2023) – San Mateo and Santa Clara County

City	Address	Year Built	Units						Area (ac)	Real. Density	Previous Use	Zoning
			Mgr.	VLI	LI	Mod.	Above Mod.	Total				
Daly City	6800 Main St	2017	1	38	13	0	0	52	0.39	133	5,812 sq.ft. Retail Building (Auto Dealer)	Light Commercial
Redwood City	353-363 Main St	2022	1	63	0	61	0	125	1.87	67	16,238 sq.ft. Office Building	General Commercial
Redwood City	2821 El Camino Real	2020	1	47	19	0	0	67	0.62	108	4,000 sq.ft. Retail Building (Enterprise Rent-A-Car)	Mixed Use
Mountain View	819 N Rengstorff Ave	2015	1	48	0	0	0	49	0.76	64	15,739 sq.ft. Retail Building	General Commercial
Mountain View	779 E Evelyn Ave	2019	1	0	115	0	0	116	2.01	58	14,700 sq.ft. Office Building	Limited Industrial
Mountain View	950 W El Camino Real	2022	1	0	70	0	0	71	0.61	116	2,031 sq.ft. Retail Building (Taco Bell)	Planned Community District
Mountain View	W El Camino Real	2020	1	49	17	0	0	67	0.49	137	1,700 sq.ft. Retail Building	Commercial/Residential Arterial District
Palo Alto	2500 El Camino Real	2017	1	0	69	0	0	70	1.81	39	12,780 and 10,000 sq.ft. Office Buildings	Service Commercial
Palo Alto	3703 El Camino Real	2022	1	14	44	0	0	59	0.44	134	3,447 sq.ft. Retail Building	Neighborhood Commercial
San Jose	278 N. 2nd St	2020	1	42	41	0	0	84	0.25	336	3,105 sq.ft. Office Building	General Commercial
San Jose	777 Park Ave	2020	2	63	117	0	0	182	1.77	103	3,256 sq.ft. Retail Building and 5,768 and 3,349 sq.ft. Industrial Buildings	Planned Development
San Jose	1020 N. 4th St	2023	1	47	46	0	0	94	0.96	98	14,400 sq.ft.Retail Building (Supermarket)	Commercial Pedestrian
San Jose	1030 Leigh Ave	2021	1	20	43	0	0	64	0.97	66	2,220 sq.ft. Retail Building (Auto Repair)	Planned Development
San Jose	1695 Alum Rock Ave	2022	1	5	50	15	0	71	0.86	83	15,000 sq.ft. Office Building	Neighborhood Commercial
San Jose	2350 Alum Rock Ave	2022	2	0	85	0	0	87	0.76	114	8,495 sq.ft. Retail Building	Main Street Ground-Floor Commercial District
Santa Clara	2904 Corvin Dr	2021	1	80	64	0	0	145	1.08	134	16,800 sq.ft. Commercial Building	Light Industrial
Santa Clara	2233 Calle Del Mundo	2022	2	0	194	0	0	196	1.14	172	16,760 sq.ft. Industrial Building	Light Industrial
								Average (sum method)		95		
								Average (simple average)		115		

Source: CoStar, California Tax Credit Allocation Committee (CTCAC)

Source: *California Tax Credit Allocation Committee (CTCAC), CoStar*

7.6.3 Housing Potential Methodology – Sites with Mixed-Use Zoning

Of the 26 sites in the 6th Cycle Site Inventory, 18 have a proposed mixed-use zoning with a total of 2,699 units approved, pending, or planned for the future. Of the 18 mixed-use sites, five have proposed projects, of which three are approved and two are in review. The remaining thirteen sites are opportunity sites identified by the City as appropriate for development in the 6th Cycle Planning Period. The mixed-use zoning designations include the following:

- Corridor Mixed-Use (CMU)
- Residential Mixed-Use (RMU)

It is important to note that there are over 1,500 units that are approved or under review in the City currently as the City's specific planning efforts have attracted a significant amount of development. The current projects in the pipeline that include a large number of residential units even though many pipeline projects are zoned for commercial uses that do not permit residential and successfully utilizing the CUP process. Additionally, the comparison of actual and permitted density (Table 7-13) shows that the City currently has, and demonstrates significant potential for, a large amount of residential development in specific planning areas.

The total number and percentage of capacity sites in the inventory that have these mixed-use zoning designations and the number of units assigned to these sites are shown in Table 7-14, Mixed Use Sites and Net Potential Units. More specifically, there are 18 sites currently zoned for a mix of uses, which represent approximately 73% of potential units at all income levels. Of those sites with mixed-use zoning, 10 (or 22% of the total units) are also designated for lower-income units. Furthermore, the 10 mixed-use, lower-income sites represent approximately 82% of potential units for all lower-income sites (despite zoning).

Table 7-14. Mixed Use Sites and Net Potential Units

	Sites	% of Total Sites	Net Potential Units	% of Total Units
Total Sites (All Zones)	**26**		**3,718**	
Mixed Use Zoned Sites (Proposed)	18	69%	2,699	73%
Lower Income Sites	14	54%	994	27%
Mixed Use Lower-Income Sites	10	38%	814	22%
% of Mixed Use Zoned Sites		56%		30%
% of Lower Income Sites		71%		82%

Source: *City of Millbrae*

7.7 Vacant Sites (including Suitability for Lower-Income Housing)

The Site Inventory identifies vacant developable residential sites with approved projects that will be developed within the current RHNA cycle. Two sites are currently vacant and zoned for residential use or mixed-use (8% of total sites) and allow for the development of two future housing units (less than 1% of total net potential units). Both vacant sites are less than 0.5 acres in size but have approved projects and neither is slated for lower-income housing.

The City is largely developed, and the acreage representing improved residential or mixed-use property is substantial and limits site availability.

All sites identified with lower-income units and specific information about the suitability of each site are presented in Table 7-10, Site Summary and Suitability of Lower-Income Sites.

7.8 Non-Vacant Sites (including Suitability for Lower-Income Housing)

The Site Inventory identifies that 24 of the 26 sites are not vacant, as defined by the California Government Code. Non-vacant sites have various existing uses including parking lots, low-density residential, retail, and office. To assess the likelihood of non-vacant sites redeveloping into residential uses during the 6th Cycle Housing Element planning period, the City has provided an inventory of sites that have been developed or are approved/pending (Table 7-12) and an analysis of recent and current market and real estate trends is provided.

California Government Code, Section 65583.2(g)(1), states that, for non-vacant sites, the City shall specify the additional development potential for each site within the Planning Period and shall provide an explanation of the methodology used to determine the development potential. The methodology shall consider factors including the following:

7.8.1 The Extent to Which Existing Uses May Constitute an Impediment to Additional Residential Development.

- As shown in Table 7-12, a large portion of the proposed developments in the City are conversions from commercial to mixed-use. More specifically, 677 (40%) of the proposed 1,702 units that are approved or pending units are within a project that will be converted to a mixed-use or residential development on non-vacant sites with commercial development. The City's experience with the redevelopment of commercial uses into residential uses demonstrates that commercial uses are not an impediment.

- Furthermore, Table 7-13 demonstrates that **existing, non-vacant commercial property does not impede the development in the Bay Area region, as evidenced by the large number of 100% affordable projects (consisting of mostly lower-income units) that have been successfully developed on privately-owned, non-vacant properties with commercial development**. Additionally, the City has had, and currently has in the pipeline, several residential projects on non-vacant sites/properties that contain commercial development.

- To specifically quantify and evaluate the potential impediment of existing uses, **the City calculated the ratio of the current assessed improvement value to the current assessed land value for all sites.** Generally, lower ratios suggest an underutilized site (i.e., a small building on a larger lot) or a lack of investment or improvement to the building (renovations and improvement trigger reassessment that increase the improvement value of the property). These factors diminish the value of the property, increasing the likelihood that a developer will look to acquire it. The results of this improvement to land value ratio analysis are as follows:

  - ***21 sites with an improvement to land value ratio between 0 and 0.86 have been included***. Of these sites, 2 (sites 9 and 11) have a property owner who has contacted the City expressing interest in redeveloping.

    - The remaining five sites (Sites 6, 8, 10, 15, and 23) have a ratio between 1.95 and 5.42. However, they are still considered feasible for the following reasons:

      - **Sites 6, 8, and 23:** All four sites have proposed developments that have been approved by the City.
      - **Site 10:** The owner has contacted the City (via their broker) to inquire about housing development on their site. This site has ownership interest.
      - **Site 15:** This project is currently under review by the City.

Section 7.8.6, Suitability of Sites, includes detailed descriptions of each site and its feasibility for development.

7.8.2 The City's Past Experience Converting Non-Vacant Sites to Higher-Density Residential Development.

Table 7-12, Proposed and Recently Built Development Projects, lists key details of 17 recent and proposed developments. The City has a proven record of non-residential and low-density residential properties being redeveloped into high(er)-density residential development. Furthermore, the DECRSP created new zoning districts – Corridor Mixed-Use, Residential

Focused Mixed-Use, and Downtown Mixed-Use. Heights and densities along El Camino Real increased with the new zoning. Specifically, heights doubled from 40 ft. in the previous commercial zoning district to as high as 125 ft. These increased allowances will continue to encourage the development of high(er)-density residential development on non-vacant sites.

Of the 17 built and proposed projects, 9 were built or proposed (before the adoption of DECRSP) with a density greater than 60 units per acre, totaling 1,600 units. The following provides additional context for some of these developments that replaced prior uses:

- **Pipeline Developments:**
  - **1301 Broadway** – This pipeline project is currently *approved* for the construction of a 99-unit development replacing a one-story dental office building.
  - **1100 El Camino Real** – This pipeline project was *approved* for the construction of a 376-unit building that will replace the El Rancho Inn Motel.
  - **959 El Camino Real** – This pipeline project was *approved* for the construction of a 278-unit development replacing a former Office Depot.
  - **480 El Camino Real** – This pipeline project was *approved* for the construction of a 9-unit development on a former private surface parking lot.
  - **300 El Camino Real** – This pipeline project is currently *under review* for the construction of a 14-unit development that will replace the Tai Wu Restaurant.
  - **230 Broadway** – This pipeline project is currently *under review* for a building permit for the construction of a 6-unit development that will replace a two-story, commercial building with retail on the first story and one residential unit on the second story.
  - **150 Serra Avenue** – This pipeline project was *approved* for the construction of an up to 488-unit development that will replace multiple commercial buildings.
  - **130-140 El Camino Real** – This pipeline project is currently *under review* for the development of a 30-unit development that will replace a medical office building.
- **Completed Developments**
  - **88 South Broadway** – This is a 105-unit condominium built on a former bowling alley in 2007.
  - **151 El Camino Real** – This is a 142-unit, Mixed-use development built on a former office building, two apartment buildings, and a parking lot in 2010.

- **120 El Camino Real** – This is a 54-unit development built on a former restaurant in 2012.
- **30 Hermosa** – This is a 9-unit development built on a former parking lot in 2021.
- **300 Millbrae, Building 6A** – This is a 79-unit development built on a former parking lot in 2023.
- **300 Millbrae, Building 5B** – This is a 320-unit development built on a former parking lot in 2023.

These developments demonstrate a capacity for the City to take land with existing uses and redevelop it with high(er)-density residential development.

7.8.3 The Current Market Demand for Existing Uses

The current data on market demand for existing use is detailed in this section. It is important to note that the demand for residential units is very high due to a large number of jobs in the City, direct highway and transit access to the San Francisco Bay Area, highly ranked school districts, and an excellent public safety record. With the increased popularity of e-commerce and changes to the demand for office space and hotels due to the COVID-19 pandemic (and the popularity of virtual meetings and remote working), the financial viability of commercial uses in the City are showing further signs of increasing redevelopment opportunities that were already occurring before the pandemic.

7.8.4 Development Trends and Market Conditions

The City performed an analysis of development trends and market conditions for the existing use types of non-vacant sites in the Site Inventory. These use types primarily include retail and office.

7.8.4.1 Retail

Retail industries are a large part of the Bay Area economies and have gone through similar stages of evolution over the last several years. Changes in consumer preferences with the advent of e-commerce have changed the retail business model to reduce demand for larger and more traditional brick-and-mortar space. The effect of e-commerce on the evolution of retail presents opportunities to repurpose existing retail uses for new mixed-use and residential developments. This trend has already occurred in the Bay Area as evidenced by Richmond's Hilltop Mall and San Francisco's 5M Development, both examples of underused retail to residential mixed-use conversions. Other recent projects include the Orbisonia Heights project

in Bay Point (Pittsburg) and the MacArthur and Central Station projects in Oakland (both include affordable units).

The COVID-19 pandemic has accelerated the evolution of the retail and Research and Development (R&D) commercial real estate market away from the large traditional brick-and-mortar footprints as evidenced by the following data:

- The City of Millbrae has a higher retail vacancy rate than the Bay Area Peninsula as a whole. More specifically, according to CoStar (a leading commercial real estate analytics database) Retail Analysis Market Report for the City of Millbrae, the retail vacancy was 7.62% as of July 2022, which is substantially higher than the 5.5% vacancy rate for the Peninsula area under the in the Kidder Mathews Retail Market Trends Report for Q1 2022.

- This change in the retail market combined with the availability of vacant and underutilized retail properties creates opportunities for redevelopment of existing retail for residential uses in Millbrae. These trends can be seen on the ground as well throughout Millbrae. For example, *The Daily Journal* reported recently on the approved project on Site 8 at 959 El Camino Real (near the City's downtown corridor) to redevelop a shuttered Office Depot and adjacent surface-level parking lot into a 216,000 square foot, 278-unit apartment building.

7.8.4.2 Office/Research and Development

R&D industries are particularly important in the tech-infused Bay Area economy. While R&D vacancy rates and rents seem to be moving in a more positive direction in submarkets surrounding Millbrae post-pandemic, the Millbrae area seems to present plenty of opportunity to convert R&D into residential uses.

- According to Colliers (a leading diversified professional services and investment management company) Q1 2022 Market Report for the San Francisco Peninsula Area, R&D vacancy in the San Bruno/Millbrae/Burlingame Submarket was 12.7%, which exceeds the 4.0% R&D vacancy rate for the San Mateo County market for the same period.

- The Colliers Q3 2020 Retail Market Report showed an overall R&D vacancy rate of 8.3% during one of the heights of the pandemic, which indicates that the San Bruno/Millbrae/Burlingame Submarket R&D market has experienced a continuous rise in vacancy rates over the last 1-2 years. However, the R&D vacancy rate for the San Mateo

County Market has stayed at 4.0% since Q3 2020 indicating a stronger R&D market in the overall region vs. the City.

- It is important to note that according to the market reports referenced above, R&D vacancy rates began to increase significantly starting in Q1 of 2019, before the pandemic. More specifically, Colliers shows San Mateo County Market R&D vacancies increasing from 1.8% to 3.1% between Q1 2018 to Q1 2019.

7.8.5 An analysis of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development.

The following sections address the legal requirements outlined in the California Government Code, Section 65583.2(g)(1) in more detail. The City cannot include an analysis of existing leases or other contracts, as this information is not publicly available. Furthermore, Section 7.8.6, Suitability of Sites, provides details for all sites, including the sites' existing use and reason for selection as a site suitable for redevelopment to residential use.

It is important to note that leases and contracts related to privately owned properties are not public information, and the City does not have any power to require or compel property owners to provide this information. The City researched existing office space listings to understand current vacancies from publicly available information and was unable to find lease information.

In addition to actual proposals and developments, the City has received indications of interest from owners and developers to redevelop commercial and low-density residential properties with a high(er)-density residential use.

Development trends, market conditions, and regulatory and other incentives and standards (such as density bonuses) continue to support such redevelopment.

7.8.6 Suitability of Sites

The following site profiles are split into pipeline developments and opportunity sites. They provide details that support the inclusion of each site into this 6th Cycle Site Inventory. Each profile includes information such as zoning, density allowances, land-to-improvement value ratios, current uses, owner interest, vacancies, etc.

Pipeline Sites

Site 2: 1301 Broadway Offices (1301 Broadway)

APN:	021-276-330	**Site Description and Factors Supporting Development:**
Site Acreage:	0.68 ac	This site is an existing, one-story dental office building. A proposed project is approved for the development of 99 units, including 49 units affordable to low-income households.
Previous Zoning:	Commercial (C)	
Existing Zoning:	Same as Previous	
Net Units Under Review:	99	
Affordable Units:	49 Low	
Proposed Project Density:	147 du/ac	
Land-to-Improvement Value Ratio:	0.02	

Site 6: El Rancho Inn (1100 El Camino Real)

APN:	021-324-320	**Site Description and Factors Supporting Development:**
Site Acreage:	5.5 ac	The proposed project received approval from the City in 2022 to demolish the existing El Rancho Inn Motel and construct a new five-story, 384-unit, multifamily apartment community (19 units will be affordable to very low-income households). **This site is located in the DECRSP area.**
Previous Zoning:	R-3	
Existing Zoning:	Corridor Mixed Use (CMU)	
Net Units Approved:	376	
Affordable Units:	19 Very Low	
Approved Density:	86 du/ac	
Land-to-Improvement Value Ratio:	2.32	

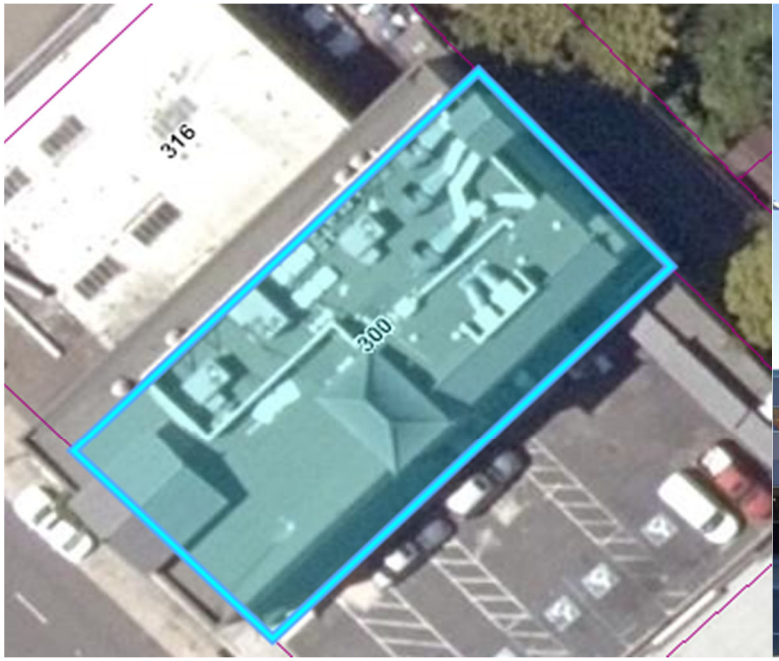
Site 8: Former Office Depot (959 El Camino Real)

APN:	021-364-080	**Site Description and Factors Supporting Development:**
Site Acreage:	1.81 ac	The City approved the development of a 278-unit, mixed-use project with ground-floor commercial and amenity space. Of the total units, 26 will be affordable to very low-income households. The proposed development was approved by the City in 2022 and will replace a former Office Depot **in the DECRSP area**. The building is currently vacant.
Previous Zoning:	Commercial (C)	
Existing Zoning:	Corridor Mixed Use (CMU)	
Net Units	278	
Affordable Units:	26 Very Low	
Approved Density:	154 du/ac	
Land-to-Improvement Value Ratio:	1.95	

Site 12: Hermosa Parking Lot (480 El Camino Real)

APN:	021-314-100	**Site Description and Factors Supporting Development:**
Site Acreage:	0.12 ac	Located at 480 El Camino Real, this parking lot received approval from the City in 2020 for the construction of a nine-unit mixed-use development with ground floor commercial. Site 12 is located **in the DECRSP area**.
Previous Zoning:	Commercial (C)	
Existing Zoning:	Corridor Mixed Use (CMU)	
Net Unit Potential:	9	
Affordable Units:	0	
Approved Density:	75 du/ac	
Land-to-Improvement Value Ratio:	0	

Site 15: Tai Wu Restaurant (300 El Camino Real)



APN:	024-154-240	**Site Description and Factors Supporting Development:**
Site Acreage:	0.12 ac	Located at 300 El Camino Real, this development is currently under review for planning entitlements (as of August 23, 2022) for the development of 14 market-rate apartments. Site 15 is located **in the DECRSP area.**
Previous Zoning:	Commercial (C)	
Existing Zoning:	Corridor Mixed Use (CMU)	
Net Unit Potential:	14	
Affordable Units:	0	
Proposed Project Density:	122 du/ac	
Land-to-Improvement Value Ratio:	4.93	

Site 16: Two-Story Commercial/Residential (230 Broadway)

APN:	024-152-180	**Site Description and Factors Supporting Development:**
Site Acreage:	0.05 ac	This development is undergoing review (as of August 23, 2022) for the development of six market-rate units. The existing two-story building consists of retail on the first floor and one, one-bedroom unit on the second story, which yields a net five units. There is no available information on the rent or income level of the existing unit. However, comparable units in the area rent for approximately $2,400 per month. Assuming this unit rents for a similar amount, the City assumed the unit is a moderate-income unit and ensured the Sites Inventory has a buffer large enough to accommodate the one-unit difference. **This site is located in the DECRSP area.**
Previous Zoning:	Downtown Improvement Area (DIA)	
Existing Zoning:	Downtown Mixed Use (DMU)	
Net Unit Potential:	5	
Affordable Units:	0	
Existing Density:	100 du/ac	
Land-to-Improvement Value Ratio:	0.33	

Site 17: Commercial Site (150 Serra Ave.)

APN:	024-337-010, 080, 090 024-154-460	**Site Description and Factors Supporting Development:**
Site Acreage:	3.4 ac	This development received approval from the City in 2019. The proposed project consists of 488 dwelling units, of which 49 are low-income units, 24 are moderate-income units, and the rest are market-rate units. **This site is located in the MSASP area.**
Previous Zoning:	Transit Oriented Development (TOD)	
Existing Zoning:	Same as Previous	
Net Units:	488	
Affordable Units:	49 Very Low; 24 Moderate	
Approved Density:	136 du/ac	
Land-to-Improvement Value Ratio:	0.25	

Site 18: Medical Offices (130-140 El Camino Real)

APN:	024-335-150	**Site Description and Factors Supporting Development:**
Site Acreage:	0.23 ac	This site consists of a one-story medical office building with a surface parking lot and is undergoing ministerial review under SB35 (as of August 23, 2022) for the development of a 30-unit mixed-use building. Three of the total units are affordable to low-income households. **This site is located in the MSASP area.**
Previous Zoning:	Transit Oriented Development (TOD)	
Existing Zoning:	Same as Previous	
Net Unit Potential:	30	
Affordable Units:	3 Low	
Proposed Project Density:	132 du/ac	
Land-to-Improvement Value Ratio:	0.21	

Site 19: Gateway Village Bldg. 6A – Veteran Preference Affordable Housing (300 Millbrae)

APN:	024-181-080	**Site Description and Factors Supporting Development:**
Site Acreage:	0.78 ac	This development received approval from the City in 2021 for 79 units of affordable housing for Veterans comprised of 24 units affordable to very low-income households and 55 units affordable to low-income households. Construction was completed in 2023. **This site is located in the MSASP area.**
Previous Zoning:	Transit Oriented Development (TOD)	
Existing Zoning:	Same as Previous	
Net Units:	79	
Affordable Units:	24 Very Low; 55 Low	
Approved Density:	146 du/ac	
d to Improvement Value Ratio:	0.00	

Site 20: Gateway Village Bldg. 5B (300 Millbrae)

APN:	024-180-350	**Site Description and Factors Supporting Development:**
Site Acreage:	2.68 ac	This development received approval from the City in 2020 for 320 dwelling units and construction finished in 2023. Of the 320 units, 20 of these units are affordable to moderate-income households. Site 20 is **located in the MSASP area**.
Previous Zoning:	Transit Oriented Development (TOD)	
Existing Zoning:	Same as Previous	
Net Unit Potential:	320	
Affordable Units:	20 Moderate	
Approved Density:	119 du/ac	
Land-to-Improvement Value Ratio:	0.67	

Site 23: Church (450 Chadborne)

APN:	024-275-120	**Site Description and Factors Supporting Development:**
Site Acreage:	0.64 ac	This development received approval from the City in 2019 for one dwelling unit. The development will add an additional unit to an existing unit already on the site. The site is primarily occupied by a church. The residential units are ancillary to the primary church use.
Previous Zoning:	Single Family Residential (R-1)	
Existing Zoning:	Same as Previous	
Net Unit Potential:	1	
Affordable Units:	0	
Approved Density:	1.6 du/ac	
Land-to-Improvement Value Ratio:	5.42	

Site 25: Vacant Lot (842 Clearfield)

APN:	021-442-090	**Site Description and Factors Supporting Development:**
Site Acreage:	0.11 ac	This site is currently vacant, and a proposed project received approval from the City in 2021 for one dwelling unit.
Previous Zoning:	Single Family Residential (R-1)	
Existing Zoning:	Same as Previous	
Net Unit Potential:	1	
Affordable Units:	0	
Approved Density:	8.7 du/ac	
Land-to-Improvement Value Ratio:	0.00	

Site 26: Vacant Lot (990 Larkspur)

APN:	021-210-280	**Site Description and Factors Supporting Development:**
Site Acreage:	0.09 ac	This site is currently vacant, and a proposed project received approval from the City in 2022 for one dwelling unit.
Previous Zoning:	Single Family Residential (R-1)	
Existing Zoning:	Same as Previous	
Net Unit Potential:	1	
Affordable Units:	0	
Approved Density:	11.1 du/ac	
Land-to-Improvement Value Ratio:	0.00	

Proposed Opportunity Sites

Opportunity Site 1: Sherwin Williams (1395 El Camino Real)

APN:	021-278-010	**Site Description and Factors Supporting Development:**
Site Acreage:	0.65 ac	Located at 1395 El Camino Real, the retail center built in 1959 sits on over half an acre of land (0.65 acres), a proposed unit total of 45 units, and allows the existing density of 80 dwelling units per acre. Coupled with a land-to-improvement value ratio of 0.12, the site is prime for development. This site is **in the DECRSP area** which allows 80-130 units per acre throughout the area. The DECRSP was adopted on December 1, 2022. As part of the DECRSP area, the site is also considered to be part of a priority development area (PDA), a designation assigned by the Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC). As a PDA, this site also features high-quality public transit access and close proximity to job centers, shopping districts, schools, and other services. This building was built in 1959.
Previous Zoning:	Commercial (C)	
Existing Zoning:	Residential Mixed Use (RMU)	
Net Unit Potential:	45	
Affordable Units:	45 Moderate	
Existing Density:	80 du/ac	
Land to Improvement value ratio:	0.12	

Opportunity Site 3: Firestone Tire Shop (1201 El Camino Real)

APN:	021-291-020	**Site Description and Factors Supporting Development:**
Site Acreage:	0.53 ac	Located **within the DECRSP** at 1201 El Camino Real, this Firestone tire shop sits on over half an acre of land (0.53 acres) with a total unit potential of 40 units and the existing density of 80 units per acre through the adoption of the DECRSP, which was adopted on December 1, 2022. The land-to-improvement value ratio of 0.18 and site composition of 50% parking lot provide a high probability of development given the lower value of improvements compared to the value of the land. As part of the DECRSP area, the site has also been designated a PDA meaning the site features access to high-quality public transit job centers, shopping districts, schools, and other services. The building age was not available on the San Mateo County Tax Roll.
Site Acreage:	0.53 ac	
Previous Zoning:	Commercial (C)	
Existing Zoning:	Residential Mixed Use (RMU)	
Net Unit Potential:	40	
Affordable Units:	40 Moderate	
Existing Density:	80 du/ac	
Land to Improvement value ratio:	0.18	

Opportunity Site 4: America's Tire Shop and Strip Mall (1121 & 1125 El Camino Real)

APN:	021-292-030, 070
Site Acreage:	1.12 ac
Previous Zoning:	Commercial (C)
Existing Zoning:	Residential Mixed Use (RMU)
Net Unit Potential:	84
Affordable Units:	84 Moderate
Existing Density:	80 du/ac
Land to Improvement value ratio:	0.86

Site Description and Factors Supporting Development:

Located **within the DECRSP** at 1121-1125 El Camino Real, this America's Tire is comprised of two parcels totaling over an acreage of land (1.12). The site also has a net unit potential of 84 units and an existing density of 80 units per acre through the adoption of the DECRSP, which was adopted on December 1, 2022. With the site comprised of almost 40% parking lot and a land-to-improvement value ratio of 0.86, the site is highly developable with improvement value remaining low. It should also be noted that as part of the DECRSP area, the site is also a PDA. This designation by the ABAG and MTC signifies that the site has access to high-quality public transit, job centers, shopping districts, schools, and other services. The building age was not available on the San Mateo County Tax Roll.

Opportunity Site 5: Parking Lot on El Camino Real (1150 El Camino Real)

APN:	021-324-310	**Site Description and Factors Supporting Development:**
Site Acreage:	0.55 ac	Located **within the DECRSP** at 1150 El Camino Real, this site is comprised of 100% of the parking lot and has a net unit potential of 62 units for very low-income households. Its current use as a parking lot coupled with its low land-to-improvement value ratio of 0.24 makes it an extremely easy-to-develop site given the low value of the improvements required to develop. Sitting on just half an acre of land (0.55) the site also features a high existing density of 130 dwelling units per acre. As part of the DECRSP, the site is also located in a PDA, meaning that it resides within close proximity to high-quality public transit, job centers, shopping districts, schools, and other services. The DECRSP was adopted on December 1, 2022, and included a rezoning of the density for the plan area to allow for up to 80-130 units per acre. As such, this site remains an extremely viable opportunity for development.
Previous Zoning:	Commercial (C)	
Existing Zoning:	Corridor Mixed Use (CMU)	
Net Unit Potential:	61	
Affordable Units:	61 Very Low	
Existing Density:	130 du/ac	
Land to Improvement value ratio:	0.24	

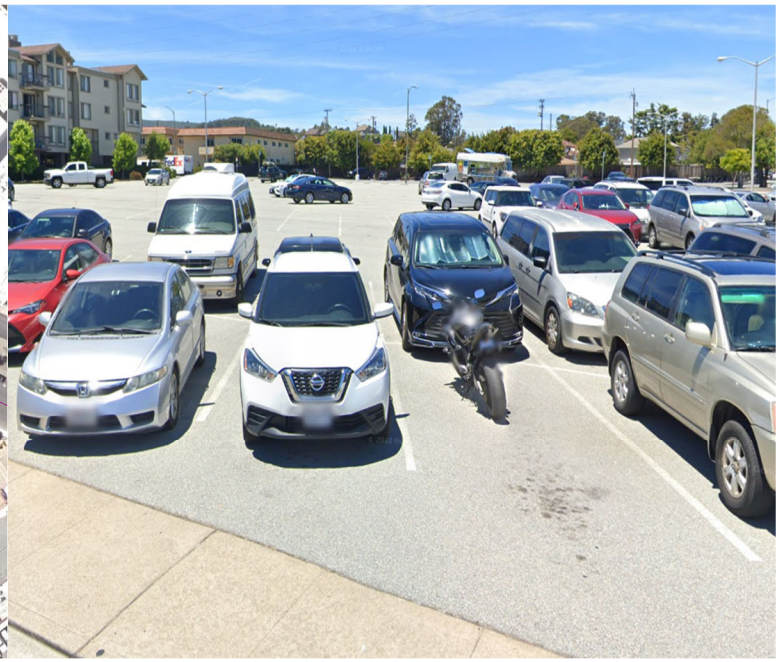
Opportunity Site 7: 24HR Fitness Strip Mall (979 Broadway)

APN:	021-362-310
Site Acreage:	1.11 ac
Previous Zoning:	Planned Development (PD)
Existing Zoning:	Residential Mixed Use (RMU)
Net Unit Potential:	84
Affordable Units:	11 Very Low; 73 Moderate
Existing Density:	80 du/ac
Land to Improvement value ratio:	0.82

Site Description and Factors Supporting Development:

Located **in the DECRSP** at 979 Broadway, this retail center built in 1968 sits on a little over an acre of land (1.11 acres) with an existing density of 80 dwelling units per acre and a net unit potential of 84 units. With a lower land-to-improvement value ratio of 0.82, the site's developability remains high. Additionally, the site resides within the DECRSP area which was rezoned to allow up to 80-130 dwelling units per acre with the adoption of the DECRSP on December 1, 2022. **Furthermore, a portion of the second story of the site is currently listed for lease on LoopNet, a leading commercial real estate website**. Finally, an additional element of development opportunity lies within the fact that the site is part of a PDA meaning it provides access to high-quality public transit, job centers, shopping districts, schools, and other sought-after services. The building was built in 1968.

Opportunity Site 9: Magnolia Ave Parking Lot



APN:	021-420-220
Site Acreage:	3.11 ac
Previous Zoning:	Planned Development (PD)
Existing Zoning:	Residential Mixed Use (RMU)
Net Unit Potential:	236
Affordable Units:	50 Very Low, 38 Low, 60 Moderate
Existing Density:	80 du/ac
Land to Improvement value ratio:	0.06

Site Description and Factors Supporting Development:

Located **in the DECRSP** west of Magnolia Ave and Library Ave, this site sits on a little over three acres of land (3.11 acres) and has a net unit potential of 236 units. Not only does the acreage lend to the developability, but the land-to-improvement value ratio is extremely low, registering at 0.06. **The site is 100% parking lot, and the property owner has expressed serious interest in development, inquiring with the City regarding zoning and potential redevelopment.** Featuring the existing density of 80 dwelling units per acre, this site lies within the DECRSP area which was rezoned to allow for higher densities of 80-130 units per acre with the plan's adoption on December 1, 2022. The site is also located within a PDA indicating close proximity to high-quality transit, job centers, shopping districts, schools, and other services.

Opportunity Site 10: Broadway Shopping Center (537 Broadway)

APN:	021-420-110
Site Acreage:	5.63 ac
Previous Zoning:	Planned Development (PD)
Existing Zoning:	Corridor Mixed Use (CMU)
Net Unit Potential:	624
Affordable Units:	110 Very Low; 65 Low
Existing Density:	130 du/ac
Land to Improvement value ratio:	2.45

Site Description and Factors Supporting Development:

Located **in the DECRSP** at 537 Broadway, this shopping center built in 1964 sits on a little over five acres of land (5.63 acres), has a high existing density of 130 dwelling units per acre, and has a net unit potential of 624. **The property owner has expressed interest in redevelopment via their broker contacting the City to inquire about zoning and redevelopment of the site.** The site has a land-to-improvement value ratio of 2.45 but resides within the DECRSP area making it part of PDA. The DECRSP was adopted on December 1, 2022. Designated as a PDA by the ABAG and MTC, the site has access to high-quality public transit, job centers, shopping districts, schools, and other services. The building was built in 1964.

Opportunity Site 11: Parking Lot on El Camino Real

APN:	021-420-130	**Site Description and Factors Supporting Development:**
Site Acreage:	2.20 ac	Located **in the DECRSP** area off El Camino Real, this site features over two acres of land (2.20 acres) and has a net unit potential of 244 units. Along with being a 100% parking lot and registering a land-to-improvement value ratio of .05 signaling increased developability, **the property owner has also expressed serious interest in development with their broker inquiring with the City regarding zoning and potential redevelopment.** The site has the existing density of 130 dwelling units per acre and in being part of the DECRSP area, which was adopted on December 1, 2022, has a designation of a PDA. This designation indicates the site's close proximity to high-quality public transit, job centers, shopping districts, schools, and other services.
Previous Zoning:	Planned Development (PD)	
Existing Zoning:	Corridor Mixed Use (CMU)	
Net Unit Potential:	244	
Affordable Units:	80 Very Low; 40 Low	
Existing Density:	130 du/ac	
Land to Improvement value ratio:	0.05	

Opportunity Site 13: Universal Supply Store (450-460 El Camino Real)

APN:	024-123-190, 200	**Site Description and Factors Supporting Development:**
Site Acreage:	0.88 ac	Located **in the DECRSP** at 450-460 El Camino Real, this storage facility is comprised of two parcels with a combined total of just under an acreage of land (0.88 acres). The combined site makeup is 50% parking lot - That, combined with a land value ratio of .04, makes the site highly developable. The site has a high existing density of 130 dwelling units per acre, a net unit potential of 97 units, and sits within the DECRSP area. Adopted on December 1, 2022, the DECRSP area was designated a PDA, signaling this site's access to high-quality public transit, job centers, shopping districts, schools, and other services. The building age was not available on the San Mateo County Tax Roll.
Previous Zoning:	Commercial (C)	
Existing Zoning:	Corridor Mixed Use (CMU)	
Net Unit Potential:	97	
Affordable Units:	85 Very Low; 12 Low	
Existing Density:	130 du/ac	
Land to Improvement value ratio:	0.04	

Opportunity Site 14: MQ Healthy Fast Food (400-420 El Camino Real)

APN:	024-123-130, 140	**Site Description and Factors Supporting Development:**
Site Acreage:	0.84 ac	Located **in the DECRSP** at 400-420 El Camino Real, this highly developable site is comprised of two parcels that total a little under an acre of land (0.84 acres). With a low land-to-improvement value ratio of 0.44 and a land composition of 75% parking lot, the site's improvement value remains very low, making it a viable opportunity for development. This fast-food restaurant lies within the DECRSP area and features a high existing density of 130 dwelling units per acre with a net unit potential of 96 units. With the adoption of the DECRSP on December 1, 2022, the areas were rezoned to allow for densities of up to 80-130 units for all sites residing within the area. With DECRSP designated as a PDA, this site features access to high-quality public transit, job centers, shopping districts, schools, and other services. The building age was not available on the San Mateo County Tax Roll.
Previous Zoning:	Commercial (C)	
Existing Zoning:	Corridor Mixed Use (CMU)	
Net Unit Potential:	92	
Affordable Units:	92 Very Low	
Existing Density:	130 du/ac	
Land to Improvement value ratio:	0.44	

Opportunity Site 21: Multi-tenant Theatre (39 El Camino Real)

APN:	024-334-150	**Site Description and Factors Supporting Development:**
Site Acreage:	0.57 ac	Located **in the MSASP** at 39 El Camino Real, this site provides a little over half an acre of land (0.57 acres) and has a net unit potential of 32 units. The land composition of a 50% parking lot coupled with the low land-to-improvement value ratio of 0.50 makes this a highly developable site with little improvement value required for the development. The site lies within the MSASP area with close access to the Millbrae station, a key intermodal connection between Caltrain's commuter rail system and BART's transit system near SFO. **This site is flanked by a for sale, a vacant theater on one side, and an active bank on the other.** Furthermore, the site has at least two vacancies and not a great deal of activity. However, the site has great access to public transit, making it prime for residential redevelopment. The building age was not available on the San Mateo County Tax Roll.
Previous Zoning:	Residential Mixed Use (RMU)	
Existing Zoning:	Same as Previous	
Net Unit Potential:	32	
Affordable Units:	32 Moderate	
Existing Density:	60 du/ac	
Land to Improvement value ratio:	0.50	

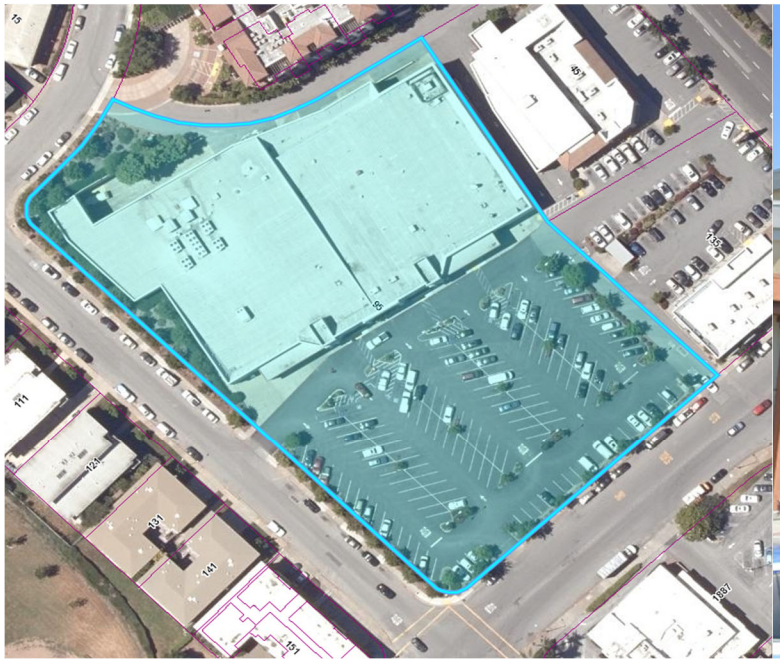
Opportunity Site 22: Multi-tenant (9 & 15 El Camino Real)

APN:	024-334-020, 030
Site Acreage:	0.61 ac
Previous Zoning:	MSASPD-Residential Mixed Use (RMU)
Existing Zoning:	Same as Previous
Net Unit Potential:	34
Affordable Units:	34 Moderate
Existing Density:	60 du/ac
Land to Improvement value ratio:	0.39

Site Description and Factors Supporting Development:

Located **in the MSASP** at 9-15 El Camino Real, this shopping center is comprised of two parcels whose combined acreage totals over half an acre (0.61 acres) and has a net unit potential of 34 units. The current density for the site is 60 dwelling units per acre. The site has a land makeup of 35% parking lot and a land-to-improvement value ratio of 0.39, making it a viable development opportunity given the lower improvement value of the development. **Furthermore, the site is currently listed on LoopNet, pointing to vacancies in the property.** Finally, the site sits within the boundaries of the MSASP area giving it close access to the Millbrae station, a key intermodal connection between Caltrain's commuter rail system and BART's transit system near SFO. The site also features close proximity to recreational services like churches and parks. The building age was not available on the San Mateo County Tax Roll.

Opportunity Site 24: Lucky Grocery Store (95 Murchison Dr.)



APN:	024-344-090	**Site Description and Factors Supporting Development:**
Site Acreage:	3.10 ac	Located **in the DECRSP** at 95 Murchison Dr., this grocery store built in 1966 sits on over three acres of land (3.10 acres), has the existing density of 130 dwelling units per acre, and has a net unit potential of 344 units. The site has a land-to-improvement value ratio of 0.79 and is comprised of 50% parking making this a viable development opportunity given the low improvement value of the development. This site lies within the boundaries of the DECRSP area which was adopted on December 1, 2022. With DECRSP designated as a PDA by the ABAG and MTC, the site has access to high-quality public transit, job centers, shopping districts, schools, and other services that add to its development feasibility. With DECRSP designated as a PDA by ABAG and MTC, the site has access to high-quality public transit, job centers, shopping districts, schools, and other services that add to its development feasibility. The building was built in 1966.
Previous Zoning:	Commercial (C)	
Existing Zoning:	Corridor Mixed Use (CMU)	
Net Unit Potential:	344	
Affordable Units:	80 Very Low; 45 Low	
Existing Density:	130 du/ac	
Land to Improvement value ratio:	0.79	

7.9 Senate Bill 330/Replacement Housing Requirements

Adopted in 2019, Senate Bill (SB) 330 implements new requirements applicable to the Site Inventory to conserve existing affordable housing units and units that are occupied by households with lower incomes. Under SB 330, sites with existing residential units cannot be counted toward the City's lower-income capacity unless the City has adopted a mechanism to preserve or require replacement of existing units that are, or within the last five years were, affordable to households with low or very low-incomes or occupied by households with low or very low-incomes (referred to by SB 330 as "Protected Units").

California Government Code, Section 65583.2(g)(3), requires that existing residential units on non-vacant sites be replaced with units affordable to the same or lower-income level when demolished. More specifically, replacement housing must be provided for the following types of non-vacant sites:

- Sites that currently have residential uses; and
- Sites that had residential uses within the past five years, which have been vacated or demolished that:
    - Are or were subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low-income;
    - Are or were subject to any other form of rent or price control through a public entity's valid exercise of its police power; or
    - Are or were occupied by low or very low-income households.

Of the 24 non-vacant sites in the Sites Inventory, two sites with existing Corridor Mixed Use (CMU) zoning have a total of nine existing units:

- **Site 6, located at 1100 El Camion Real,** is *approved* for the replacement of eight existing occupied residential units and a Best Western El Rancho Inn with 376 units, including 19 very low-income units and 357 above moderate-income units. This development will significantly increase the number of existing units.
- **Site 16, located at 230 Broadway,** is a two-story building that includes retail on the first story and one residential building on the second story. The site currently has a proposed project that is *under review*. This project consists of six residential, which is a significant increase to the existing unit. This capacity provides an opportunity for the financial return needed to cover the cost of replacement housing.

To ensure that any demolished units are replaced, the City is including a program for replacement units (See Program HIP-13, Replacement Housing). Under this program, the City will review all available information for a property (obtained from the property owner), reach out directly to the existing tenants to determine their household income, and determine if the proposed units are sufficient for replacement. If the City determines that the new residential units do not replace the unit at the appropriate affordability level, the City will require the developer to replace the existing units at the same or a lower affordability level.

7.10 Senate Bill 1333 Requirements – "No Net Loss"

Recent modifications to the Housing Element law adopted through SB 1333, known as the "No Net Loss" provision, require that the City maintain the adequate capacity to accommodate the remaining unmet portion of its RHNA target for each of the income categories throughout the 8-year Housing Element Planning Period. The City must also monitor housing production as the Planning Period progresses and ensure that the City does not reduce the housing capacity below what is needed to meet its RHNA target by income level through either of the following methods:

- Adoption of reductions in allowable residential densities for sites identified in the Site Inventory through community plan update/amendment or rezoning.
- Approval of development or building permits for sites identified in the inventory that authorize the construction or development of fewer units (by income level) than identified as possible in the inventory.

To address the "No Net Loss" provisions, the City completed the following steps in preparing the Site Inventory:

- Evaluated the need to reduce the estimates of site housing capacity based on topography, environmental features, site acreage, and expectations for mixed-use development. Where deemed appropriate, the City applied such reductions.
- Further reduced estimated site housing capacity to ensure estimates are conservative, ranging between 85% and 100% of the net potential housing units, based on site-specific zoning and units' designated income levels. The average realized density of proposed and recently built developments ranges between 7 and 131 for different zones.
- Identified sufficient sites with housing capacity to provide a reasonable capacity buffer (17% of gross RHNA numbers for very low-income units, 18% for low-income units,

lower-income levels, and 29% for the moderate-income level) above the City's RHNA targets to ensure that the City maintains the adequate capacity to meet its targets.

The Housing Plan includes Program HIP-47 to continue efforts to document and monitor residential building activity tied to Housing Element program targets.

7.10.1 Assembly Bill 1486 City-Owned Land

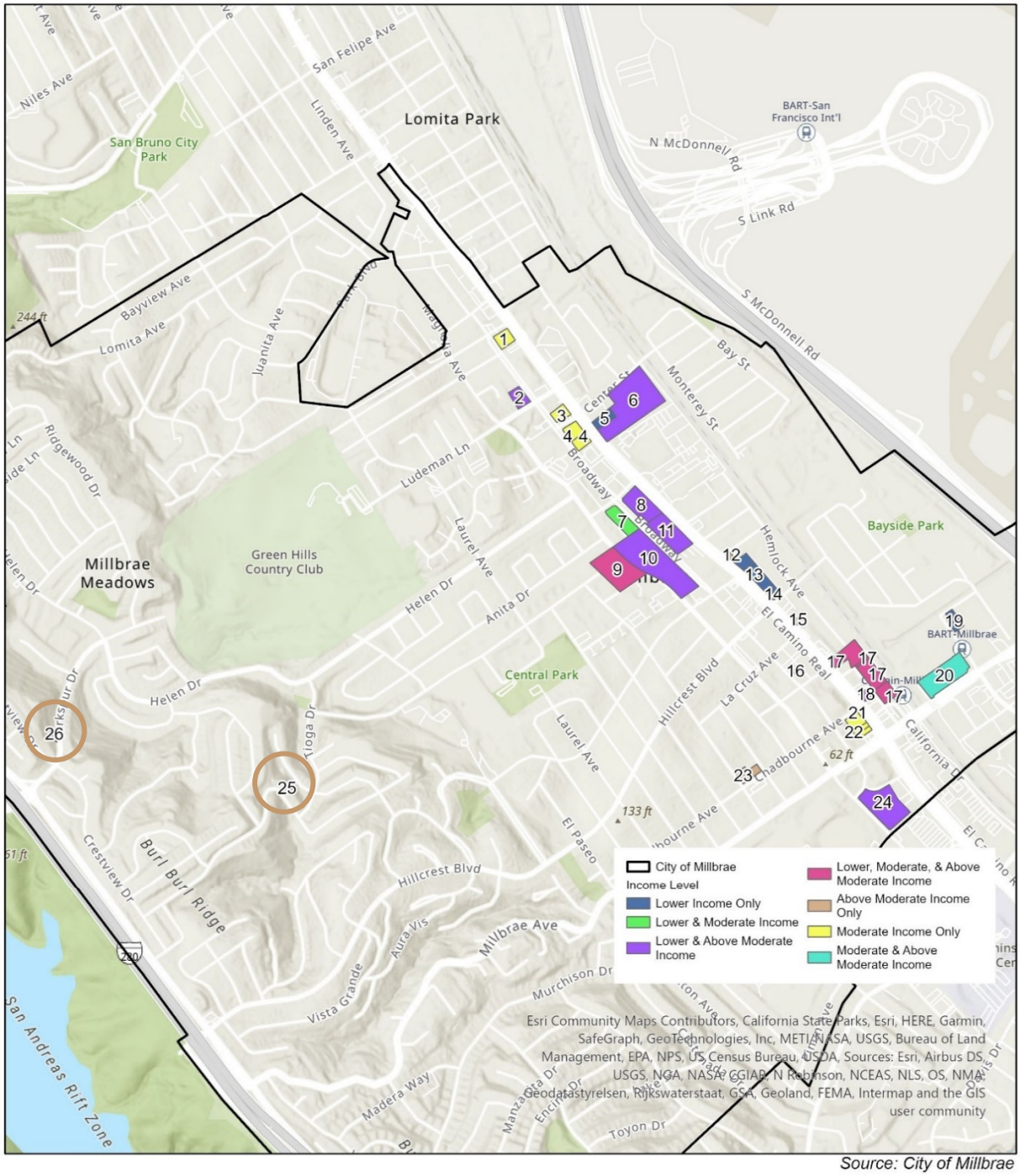
The Site Inventory does not contain any City-owned properties. The City evaluated City-owned properties and determined that none of them has the capacity for new residential development.

7.11 Summary

As stated above, through its Site Inventory, the City has identified 26 sites adequate for the development of housing and that have the following characteristics:

- Housing capacity that is reasonably developable within the Planning Period for at least 3,830 net housing units (of which 112 are ADUs) with the adoption of the DECRSP.
- There are zero sites previously included in the 5th Cycle Housing Element that are non-vacant designated for lower-income units in the 6th Cycle Housing Element.
- Each identified site is adjacent to developed land and/or is the subject of a proposed housing development project.
- Based on the review of the documentation outlined in this Chapter, each site has sufficient utility supply available and is accessible to support housing development.
- Sites identified for lower-income capacity, per State law, have a parcel size of at least 0.5 acres and less than 10 acres, with the exception of Site 18, which is a pipeline project under review for the development of five lower-income units.
- All sites identified for lower-income capacity have a zoning designation that permits a development density of 30 or more dwelling units per acre, the City's default lower-income density according to California Government Code, Section 65583.2.

Figure 7-6. Site Inventory Income Levels



Source: City of Millbrae

Harris & Associates

N

0 0.15 0.3 Miles

Sites Inventory Income Levels

City of Millbrae Sites Inventory

Figure 7-7. Site Inventory Income Levels View #1

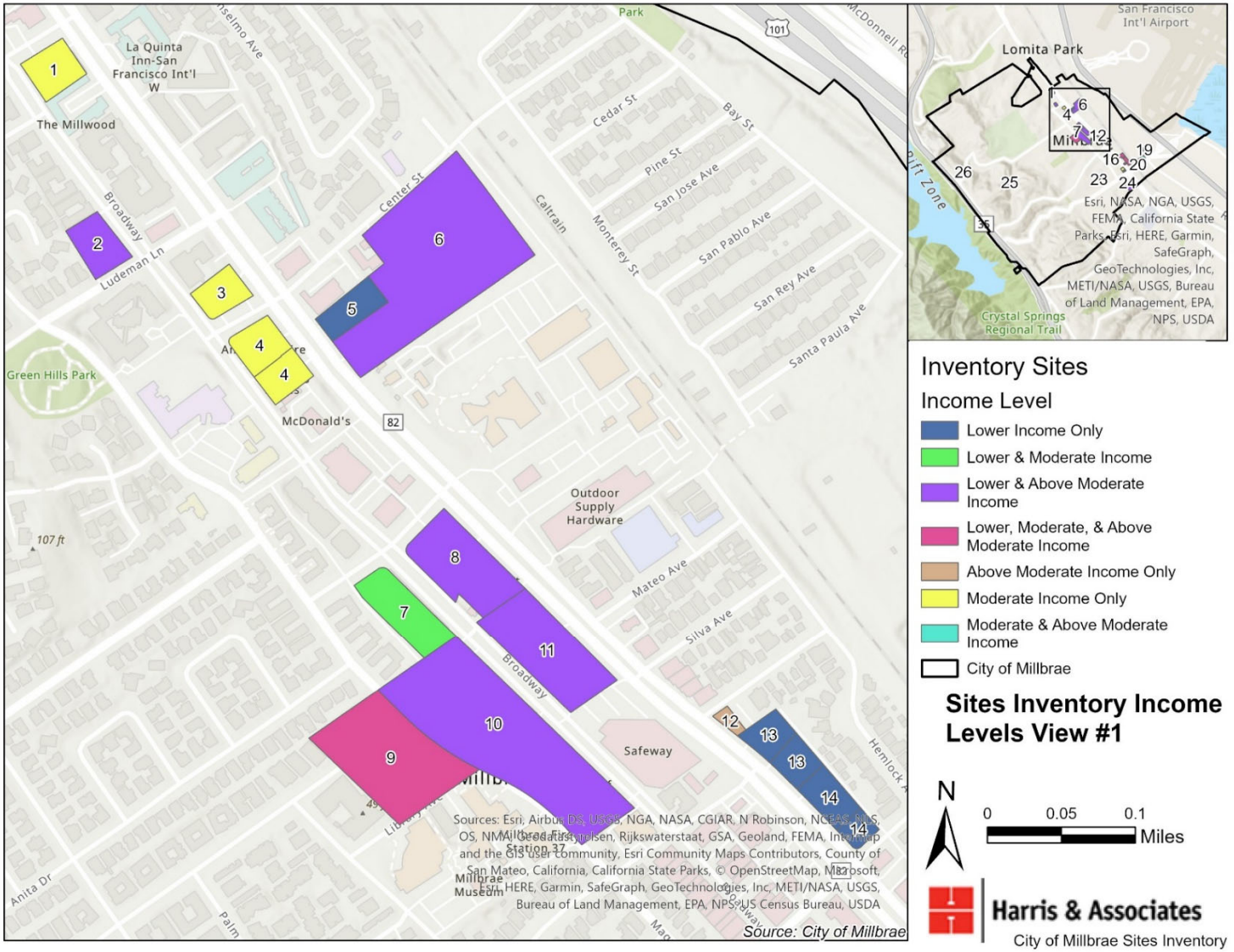


Figure 7-8. Site Inventory Income Levels View #2

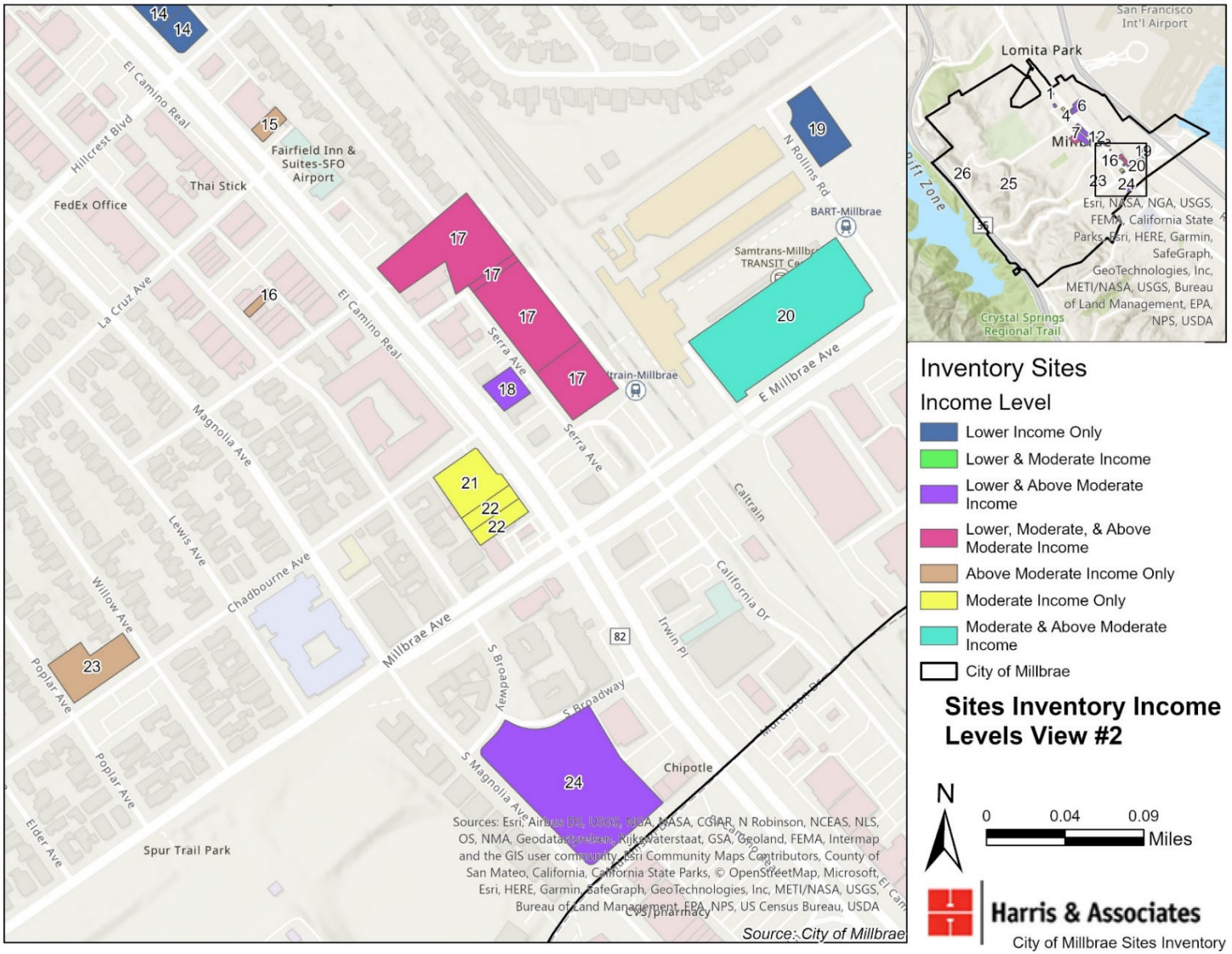
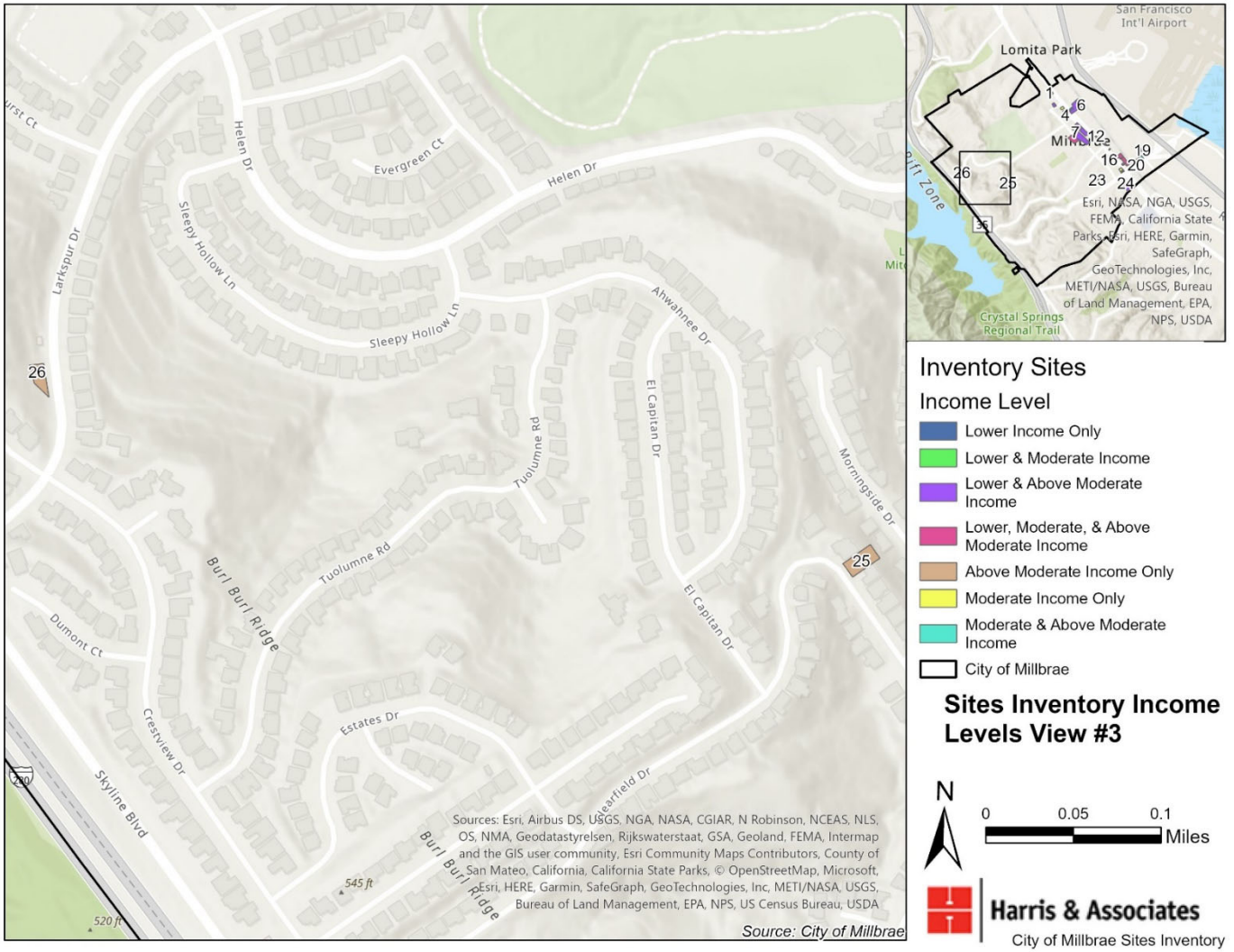


Figure 7-7. Site Inventory Income Levels View #3



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8 HOUSING PLAN

California Government Code, Section 65583(c), requires a program that sets forth a schedule of actions during the planning period that the local government is undertaking or intends to undertake to implement the programs and achieve the goals and policies of the Housing Element. The goals, policies, and programs have been established to address the housing issues in the City of Millbrae (City or Millbrae) and to meet state housing law requirements, including the identification of the agencies and officials responsible for the implementation of the various actions. The City's overall objective is to ensure that decent, safe housing is available to current and future Millbrae residents of all income levels. The goals of this Housing Element are formulated based on information provided in the Community Profile, Housing Constraints, and Affirmatively Furthering Fair Housing sections of this document, as well as input from the City Council, Planning Commission, city staff, and members of the public. The components of this section can be described as follows:

- **Goals** are the results that the City desires to achieve over the housing planning period. They are general expressions of values or preferred outcomes, and therefore, are abstract in nature and may not be fully attained. The goals are the basis for City policies and actions during this period.
- **Policies** are specific statements that will guide decision-making. Policies serve as directives to developers, builders, service providers, decision-makers, and others who will initiate or review new development projects or seek to provide housing-related services in the City. Some policies stand alone as directives, but others require that additional actions be taken. These additional actions are listed as "programs."
- **Programs** are the core of the City's housing strategy. Programs translate goals and policies into actions. These include ongoing programs, procedural changes, zoning ordinance changes, and other actions that implement housing policies and help achieve housing goals. Each program identifies the funding source, responsible party, and timeframe for implementation.

This section contains the City's Housing Plan for the 2023-2031 Housing Element planning period.

8.1 Goals, Policies, and Programs

Goal H1: Reinforce the City's Commitment to Meeting Housing Needs

To provide adequate housing sites and encourage the availability of housing types for all economic segments of the community consistent with the infrastructure and service capacities of the City.

Policies

- **H1.1: City Leadership.** Provide an active leadership role in helping to attain the objectives of the City's Housing Element by following through on the actions prescribed in the Housing Element promptly and monitoring progress annually to review housing goals and target achievements.

- **H1.2: Public Participation.** Encourage and support public participation in the formulation and review of the City's housing policy, including encouraging neighborhood-level planning, and working with community groups and the building and real estate industry to advocate programs that will increase affordable housing supply and opportunities.

- **H1.3: Cooperation with local Fair Housing Organizations, Service Providers, Housing Advocacy, Property Owners, Developers (Market Rate and Affordable), Other Public Agencies, and Non-Profits.** Continue participation in countywide housing assistance programs and coordinate with other public agencies and non-profit housing sponsors in the use of available programs to provide lower-cost housing in and other programs Millbrae. As appropriate, cooperate in countywide collaborative projects, such as 21 Elements.

- **H1.4: Development Opportunities.** Identify opportunities to promote appropriate development using local economic development and affordable housing tools and resources, coupled with the City's resources to provide infrastructure and services such as water and sewer capacity.

- **H1.5: Fair Housing and Equal Housing Opportunity.** Promote fair housing and equal housing opportunities for all Millbrae residents and ensure the provision of housing opportunities for all people. The City will take appropriate actions when necessary to ensure that the sale, rental, or financing of housing is not denied to any individual based on race, sex, national origin, religion, age, or other arbitrary factors.

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
HIP-1. Triennial Advocacy Meeting with Affordable Housing Property Owners/Managers, Fair Housing Providers, Service Providers, Housing Advocates, and Non-Profits The City will update the contact list as shown in Appendix B (AFFH) of this Housing Element every three years and schedule a meeting once every three years with affordable housing property owners/managers, service providers, housing advocates, and non-profits (Triennial Advocacy Meeting) to provide information on existing programs and resources and obtain input on needs and potential opportunities to create additional affordable housing. On the years the Triennial Advocacy Meeting does not take place, the City will outreach to all the organizations in the contact list and request any new feedback they may have. The goal of this program is to obtain input on housing needs so that the City can partner with organizations to secure and leverage funding for services and special housing needs as well as ensure that tenants and landlords are connected to fair housing resources. The City will actively partner with these groups to obtain input on housing needs (including special needs populations, such as persons with disabilities, extremely low-income families, large families, etc.) and opportunities for providing appropriate affordable housing in the community. Schedule of Action: Update the list within six (6) months of Housing Element certification by HCD and meet triennially, beginning in FY 2024–25. In the years, the Triennial Advocacy Meeting does not take place, reach out to organizations on the list and request feedback.	H1.2, H1.3, H1.5	N/A	None required	Community Development Department
HIP-2. Annual Housing Element Reporting The City shall review and report annually on the implementation of Housing Element programs and the City's effectiveness in meeting the program objectives for the prior calendar year. The City shall present the annual report to the City Council at a public hearing before submitting the annual report to the California Department of Housing and Community Development (HCD). The goal of this program is to provide transparent information on the City's housing progress and to meet State legal requirements. Schedule of Action: Annually by April 1.	H-1.4	N/A	None required	Community Development Department
HIP-3. Annual Meeting with San Mateo County Housing Authority and the San Mateo County Consortium to Identify Affordable Housing Opportunities The City shall contact the San Mateo County Housing Authority and the San Mateo County Consortium to set up an annual meeting (Annual SMCHA & SMCC Meeting) to	H1.3	N/A		Community Development Department

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
discuss affordable housing resources and opportunities, such as a regional housing trust. The discussion will include available funds and benefits available for regional organizations. The City will use this meeting to gather feedback from SMHA and SMCC on (1) regional and local housing issues that need immediate attention, (2) opportunities for regional collaboration to address such issues (such as regional housing trust), (3) funding availability and opportunities to submit joint grant applications, and (4) seek support from both organizations for local housing programs. After the meeting, the City will create action items on programs/actions Millbrae can partake in and staff shall take these programs to City Council for public comment and approval. The City shall propose one program per year that advances the implementation of Housing Element programs. Schedule of Action: First meeting by the end of FY 2023–24 and annually thereafter. The program shall be proposed to City Council within six months of the meeting.				
HIP-4. Monitor Legislative Changes The City shall monitor legislative changes to ensure that City policies and regulations comply with state and federal laws. Schedule of Action: Annually by December 31.	H1.1	N/A	N/A	Community Development Department
HIP-5. Support Local School Districts for Better Educational Outcomes The City shall reach out and offer to schedule a meeting with San Mateo Union School District and the Millbrae Elementary School District to discuss educational needs and ways to support school districts, within the City's planning capacity, to provide better educational outcomes for students. This meeting will allow the City to assist the school districts in addressing college readiness for minority students who struggle with lower educational outcomes in comparison to their white counterparts. Schedule of Action: Schedule a meeting by the end of FY 2024-25 and hold a meeting every two years by December 31.	H1.3	N/A	N/A	Community Development Department

Goal H-2: Protect and Enhance Existing Housing, Community Character, and Resources

To facilitate affordable housing opportunities.

Policies

- **H2.1: Maintenance and Rehabilitation of Existing Housing.** Promote maintenance and rehabilitation of structures in substandard condition and upgrade units lacking adequate kitchen and plumbing facilities. Encourage property maintenance measures designed to maintain the existing housing stock in its overall good condition and encourage rehabilitation to the extent possible and when necessary for low- and moderate-income homeowners and rental property owners with lower-income tenants.
- **H2.2: Energy Conservation in Existing Housing**. Encourage energy conservation measures in rehabilitation projects. Encourage owners of existing residences to adopt energy conservation measures and promote energy conservation programs that assist in energy conservation improvements.
- **H2.3: Energy Conservation in New Housing**. Promote the use of energy conservation in residential construction by incorporating energy conservation in all new residential development. New homes shall meet State standards for energy conservation.
- **H2.4: Rental Assistance Programs.** Continue to publicize and participate in federal rental assistance programs such as Section 8 and the Housing Voucher programs.
- **H2.5: Protection of the Rental Housing Stock.** Promote the balance of rental units with homeownership opportunities and encourage rental subsidy programs and down payment assistance programs that can be applied to existing housing.
- **H2.6: Community Preservation.** Facilitate the maintenance of the housing stock by enforcing the housing and other codes for all types of residential units. As neighborhoods age, the City should provide all possible assistance for housing rehabilitation and maintenance measures through aggressive code enforcement and community preservation.
- **H2.7: Home Sharing.** Encourage and facilitate house sharing in appropriate locations where it would provide housing for low- and moderate-income residents.
- **H2.8: Application of Existing Regulations and Guidelines.** Provide and apply regulations and guidelines to promote the maintenance and protection of existing residential areas.
- **H2.9: Reduce Exposure to Environmental Pollution.** Take steps to address the environmental pollutants Millbrae residents are exposed to that may lead to health issues.

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
HIP-6. Encourage the Rehabilitation of Substandard Housing Units Continue the City's existing code enforcement program and consider expansion of the program to assure compliance with basic health and safety building standards. Code enforcement staff will contact owners of housing structures that appear to be in substandard condition and offer inspection services. Code enforcement staff will require life and safety upgrades. Code enforcement staff will also provide resources (e.g., Housing Assistance Human Investment Project, California Tenant Information, and La Raza Centro Legal) to tenants that live in substandard housing rentals. Schedule of Action: At a minimum, perform semiannual field surveys to identify substandard housing. The field surveys shall take place by June 30 and December 31 every other year.	H2.1, H2.6, H2.8	N/A	None required	• Community Development Department • Fire Marshall
HIP-7. Residential Energy Conservation Program Continue to publicize energy conservation programs including Power On Peninsula, Heat Pump Water Heater Rebates, HomeIntel, and Energy Upgrade California, San Mateo County Energy Watch - Turn-key Energy Efficiency Retrofit Program, Property Assessed Clean Energy Financing for Residents, and weatherization services on the City's website. Such programs are available to provide subsidies, inspections, and improvements. As part of the FY 2023-2024 City Council Goals, the City will explore potential local enhancements for solar generation for residential mixed use and large residential development. Schedule of Action: Review and update the City's website every year by the end of quarter 1. Social media, newspaper, and email systems will provide at least two updates per year by June 30.	H2.3	N/A	None required	• PG&E • North Peninsula Neighborhood Service Center • San Mateo County Department of Housing • Community Development Department
HIP-8. Energy Conservation Grant Funding City staff will sign up for email alerts from State and Federal agencies and review grant funding opportunities related to energy conservation programs. City staff will track available grant funding to further promote and create more initiatives that promote energy-efficient behaviors and programs, water-saving programs, and greenhouse gas (GHG) reducing programs. The City shall apply for or assist local/regional organizations with at least one (1) eligible grant per year (as available). Schedule of Action: Annually by December 31.	H2.2, H2.3	N/A	General Fund	Community Development Department

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
HIP-9. Reduce Exposure to Environmental Pollution The City is in the process and continues to take several steps to implement climate planning initiatives to mitigate climate impacts, reduce pollutants and greenhouse gas emissions (GHG), and prepare for a climate-resilient future by completing the following through the implementation of the actions contained in the 2020 CAP: • Continue to provide greener renewable electricity to citizens and businesses through Peninsula Clean Energy. • Continue to audit City facilities for energy efficiency opportunities and implement energy-efficient retrofits. The City participates in the San Mateo County Energy Watch and leverages benchmarking to identify opportunities for energy-efficient upgrades and track energy performance. • Continue to promote participation in residential energy efficiency programs, including BayREN's Home+ program, San Mateo County Energy Watch, and PG&E's efficient appliance rebates. • Implement the energy conservation program for cooling homes through the provision of free or subsidized shade trees for buildings with eastern, western, or southern exposures. • Leverage incentives and resources provided by PCE, BayREN, and PG&E to encourage residents and offices to upgrade electric panels to accommodate all-electric technologies including solar PV, battery storage, air source heat pumps, heat pump water heaters, electric dryers, electric stoves, and electric vehicles. • Update the Building Code to mandate that residential and commercial new construction and major remodels be built to an all-electric standard, including electric heating, cooling, and water heating. • Develop a comprehensive tree ordinance to regulate the various aspects of tree planting, removal, and maintenance on public and private property. Strategic planting of trees will help to reduce air pollution, lower ambient noise, generate oxygen, clean the air of particulate matter benefitting sensitive populations such as children, the elderly, and residents with asthma, and improve the overall quality of life for residents. An estimated $75,000 of General Fund will be needed to complete the project. In addition to taking these actions by implementing the 2020 CAP, the City shall update its online Climate Action Plan Emissions Reduction Measures Dashboard at least every six months and as actions are complete. This will help the City assess the progress, and plan for upcoming actions.	H2.2, H2.3, H2.9	N/A	General Fund	• Environmental Services Division • Public Services

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
Schedule of Action: Update the dashboard as actions are taken, with a minimum update every six months.				
HIP-10. Coordinate with the SFO Community Roundtable and C/CAG to Monitor Noise and Air Quality Outcomes The City is a member of the SFO Community Roundtable, along with C/CAG and other jurisdictions near SFO. During the SFO Community Roundtable meetings, the City shall raise noise and air quality issues affecting Millbrae residents and discuss existing measures to discuss their efficacy in mitigating environmental pollution, including air quality and their effectiveness in helping the City meet its 2020 CAP goals. Schedule of Action: City staff will attend at least one (1) meeting per year to bring attention to resident impacts from SFO and advocate for stronger measures to mitigate noise and air quality impacts	H2.9	N/A	General Fund	Community Development Department
HIP-11. Encourage Section 8 Rental Housing Assistance During its Triennial Advocacy Meeting, the City shall invite the San Mateo County Housing Authority to advertise and encourage participation in the Housing Authority's Section 8 Rent Subsidy Program. This program shall increase knowledge of the Section 8 assistance program so that advocates can provide feedback and better understand the program, ask questions, and provide input. Schedule of Action: Every three years during the Triennial Advocacy Meeting.	H2.4, H2.5	N/A	Section 8	• San Mateo County Department of Housing • Community Development Department
HIP-12. Advertise Human Investment Project (HIP) Home-Sharing Program to Residents Continue to support HIP Housing (a non-profit housing organization in San Mateo County focused on poverty and homelessness) by providing information on the City's website. HIP's Home Sharing Program is a program that matches homeowners with extra rooms with prospective tenants to assist with household tasks for reduced rent that is affordable. While the City does not run the program and cannot provide direct services to residents, the City shall assist HIP with targeting information at least once per year to higher-income and single-family neighborhoods where lower-income sites are not identified. To assist HIP with general advertisements, staff shall utilize the City's website, social media, and monthly newsletter. The City shall utilize each medium at least once per year, resulting in three (3) general advertisements per year.	H2.7, H4.1	N/A	None required	• Community Development Department • HIP

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
To assist HIP with targeted advertisements, staff shall send information to the targeted neighborhoods using the City's utility bill mailing. In addition, the City shall reach out to homeowners associations in the targeted neighborhoods. The City shall utilize each medium at least once per year, resulting in two (2) targeted advertisements per year. Schedule of Action: Update City's website with current links and information, post on social media, and advertise in the City's monthly newsletter at least once per year by December 31. Complete two targeted advertisements per year through the City's utility bill and homeowners associations by December 31.				
HIP-13. Replacement Housing for Existing Lower-income Units on Sites for Residential Development The Sites Inventory includes two non-vacant and underutilized sites with a total of 9 existing residential units totaling: • **Site 6** located at 1100 El Camino Real, is an approved project for 384 residential units and has an existing eight units. Building permits have not been issued for the project. The City will contact the developer when building permits are submitted to indicate that the income levels of existing tenants must be determined before the project continues. If lower-income households reside on the site currently, the City will require an agreement provided by the City, or approved by the City, to ensure the replacement of the lower-income units. • **Site 16** located at 230 Broadway, is a project under review for six residential units and has an existing unit. If the project is approved, the City will contact the developer to indicate that the income levels of existing tenants must be determined before the building permit issuance. If lower-income households reside on the site currently, the City will require an agreement provided by the City, or approved by the City, to ensure the replacement of the lower-income units before building permit issuance. The proposed redevelopment of these sites significantly increases the capacity of residential units, providing an opportunity for the financial return needed to cover the cost of replacement housing. To ensure that any lower-income units demolished in the process of redevelopment are replaced, the City will review all available information for the property, reach out to existing tenants to determine their income levels, calculate the number of units with	H2.1, H2.5	9	Developer Funded	Community Development Department

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
lower-income households, and determine if the proposed units are sufficient for replacement. The City will coordinate with developers to ensure the appropriate numbers of affordable units are built to replace existing units with lower-income households, under California Government Code, Section 65915. Schedule of Action: As projects are proposed (timing dependent on development community).				

Goal H-3: Provide New Housing and Address Affordable Housing and Other Special Needs

To provide a range of housing opportunities for Millbrae residents with special needs, including seniors, persons with disabilities, single female-headed households with children, large families, the unhoused, and residents with extremely low incomes.

Policies

- **H3.1: Housing for Employees and their Families.** Given the increase in commercial and retail development expected through the build-out of the city, support access to affordable housing for employees and their families.
- **H3.2: Planned Development Process.** Encourage the use of the planned development process to achieve a diversity of housing types and tenure and to provide greater choice for residents and workers in Millbrae.
- **H3.3: Mixed-Use Development.** Encourage mixed residential/commercial uses on those parcels where a mix is feasible and appropriate, consistent with the General Plan, through increased densities and reduced unit sizes (dependent on market demand and developer interest).
- **H3.4: Affordable Housing.** Improve the balance of housing type, tenure, and affordability by encouraging the development of housing at appropriate sites/locations to serve various income levels and utilize available local, regional, State, and federal resources to achieve affordable housing.
- **H3.5: Incentives for Affordable Housing.** Continue to approve housing at higher densities when affordable units are provided, consistent with environmental constraints, and the density bonus law. The City will offer, to the extent feasible, other incentives such as cost-saving site design techniques, reduced parking requirements, additional height, fast-track project review, funding, and other methods of reducing the total cost of internal roads and utilities serving the development.
- **H3.6: Density Bonuses for Affordable Housing Projects Consistent with State Density Bonus Law.** The City will offer density bonuses consistent with the State Density Bonus Law (Government Code Section 65915) for projects. The City will update its 2015 Density Bonus Ordinance to reflect current State laws and continue to update the Ordinance as legislative changes occur.
- **H3.7: Resale Controls on Owner-Occupied Below Market Rate (BMR) Units.** Require resale controls on owner-occupied BMR units to ensure that affordable units provided

through public assistance or public action are retained for at least 45 years as affordable housing stock, with the minimum 45-year period resetting at each resale.

- **H3.8: Rent and Income Restrictions on Rental BMR Units.** Require rent and income restrictions on rental BMR units to ensure that affordable units provided through public assistance or public action are retained for at least 55 years as affordable housing stock.
- **H3.9: BMR Eligibility Priorities.** To meet a portion of the City's local housing need, consistent with Association of Bay Area Governments (ABAG) Housing Need Determinations, and as a traffic mitigation measure, the City will, to the extent consistent with applicable law, consider offering a portion of the BMR units in a project for City employees, school district employees, and other people working in the City of Millbrae.
- **H3.10: Innovative Housing Approaches.** Encourage innovative housing development and affordability approaches to increase the availability of low- and moderate-income housing, including encouraging cooperative and joint ventures between owners, developers, and non-profit groups in the provision of BMR housing.
- **H3.11: New Housing Eligible for Subsidy.** Provide technical support or referrals to resources to developers of new housing projects that include affordable units to pursue subsidies to reduce the cost of the units, such as Section 8, home-sharing, or similar programs which provide very low-, low-, and moderate-income housing.
- **H3.12: Housing Opportunity Areas.** The City has identified housing opportunity areas where a special effort will be made to provide affordable housing consistent with other General Plan policies. Housing Opportunity Areas are identified as the Downtown and the Millbrae Station Area. Housing Opportunity Areas have the following characteristics:

  a. The area has the potential to deliver sales or rental units at low or below market rate prices or rents.

  b. The area has the potential to meet special housing needs for local workers, single parents, seniors, and small or large families.

  c. The area has been subject to a planning study and found appropriate to facilitate the provision of housing units to meet the City's housing objectives.

  d. The following criteria for the selection of Housing Opportunity Areas is applicable:

    1. Adequate vehicular and pedestrian access.

    2. Convenient access to transit (or the project must be able to provide transit to meet the needs of the project's prospective residents).

3. Convenient access to neighborhood services and facilities as needed by the prospective residents.
4. Convenient access to neighborhood recreation facilities designed to provide adequate recreation facilities on site.
5. Cost-effective mitigation of physical site constraints (including geologic hazards, flooding, drainage, soil constraints, wetland limitations, etc.).
6. Cost-effective provision of adequate services and utilities to the site.
7. Ability to meet applicable noise requirements.
8. Adequate site size to provide adequate parking; parking requirements should be flexible based on the needs of the project's prospective residents.

The City will utilize the land use entitlement process through discretionary permits, rezoning, or development agreements.

- **H3.13**: **Adaptable Units for the Physically Disabled.** The City will work with developers to ensure that new housing includes units that can be adapted for use by disabled residents.
- **H3.14: Special Needs.** Encourage affordable housing designed for special needs households including large families with children, female-headed households, seniors, and disabled households, through outreach, education, and the development review process.
- **H3.15: Housing for the Unhoused Population.** The City of Millbrae recognizes the need for transitional (emergency shelter) and permanent supportive housing for the unhoused consistent with State law requirements.
- **H3.16: Reasonable Accommodations for the Disabled.** To ensure equal access to housing, provide reasonable accommodation for people with disabilities in the City's rules, policies, practices, and procedures related to zoning, permit processing, and building codes.
- **H3.17: Airport Development Restrictions.** Ensure that new development is consistent with all airport/land use compatibility criteria under the Comprehensive Land Use Plan for San Francisco International Airport.
- **H3.18: Support Regional Efforts.** Support a regional approach to solving the housing problems that cannot be solved by individual jurisdictions.

- **H3.19: Employment Opportunities for Persons with Disabilities.** Support the efforts of local service providers to increase employment opportunities for persons with a disability.
- **H3.20: Mitigate Displacement Risk.** Support affordable housing, provide access to resources, and collaborate with local organizations to mitigate the risk of displacement for Millbrae residents.
- **H3.21: Incentivize Accessory Dwelling Units.** Encourage and Incentivize the development of Accessory Dwelling Units for the development of affordable units in the City.
- **H3.22: Streamline and Support Housing Development.** Offer support to housing developers to streamline and encourage the development of affordable and market-rate, high-density housing in Millbrae.

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
HIP-14. Conduct a Residential Development Feasibility Study To ensure that development impact fees are not a constraint to housing development in Millbrae, the City shall prepare a financial feasibility analysis for residential development that studies the financial effects of development impact fees and inclusionary housing in-lieu fees and all other development cost variables on residential development feasibility. The City shall utilize its findings to make fee reductions, if necessary. Schedule of Action: The City will retain a consultant within four years of Housing Element certification to prepare an independent, third-party analysis.	H3.4, H3.5	N/A	• General Fund	Community Development Department
HIP-15. Continue to Implement the Millbrae Station Area Specific Plan The City will continue to implement the specific plan for the Millbrae BART/Caltrain Station Area, which identifies potential housing sites. Schedule of Action: Ongoing, as developers propose projects and sites are developed.	H3.2, H3.3, H3.4, H3.5, H3.10, H3.11, H3.12, H3.14, H3.15, H3.22	917	• CDBG, • CSG • ESG • HOME • HOPWA • Other State & Federal funds	Community Development Department
HIP-16. Downtown and El Camino Real Specific Plan Adoption and Implementation The City will adopt the Downtown and El Camino Real Specific Plan (DECRSP) to provide a roadmap for future growth to encourage residential development near transit, jobs, and services to further the City's climate goals. The DECRSP emphasizes transit-oriented, mixed-use development and provides a mix of housing, restaurants, general commercial, hotels, offices, and entertainment uses. The DECRSP specifically rezones the majority of the sites in the site inventory to allow for additional density to accommodate the City's RHNA to increase the supply of housing to mitigate housing cost increases. Schedule of Action: Adopt DECRSP by the end of 2022.	H3.2, H3.3, H3.5, H3.5, H3.10, H3.11, H3.12, H3.14, H3.15, H3.22	682	• General Fund	Community Development Department
HIP-17. Rezone for Lower-income Sites Government Code Section 65583.2(c)(3)(B) specifies that a minimum density of 30 units per acre is necessary to meet the City's low- and very low-income housing needs. The 6th Cycle Sites Inventory identifies 994 total potential lower-income housing units on 14 sites that are suitable for lower-income housing development. Of those 14, ten will be rezoned through the adoption of the DECRSP to allow for the minimum density required by law. The ten DECRSP sites will be rezoned as follows:	H3.4, H3.5, H3.14, H3.22	Included in the number under HIP-13	• General Fund	Community Development Department

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
• **Sites 5, 6, 13, 14, and 24** are currently zoned for Commercial (C) and will be rezoned for Corridor Mixed Use (CMU) with a maximum density of 130 units per acre. • **Site 8** is currently zoned for Commercial (C) and will be rezoned for Residential Mixed Use (RMU) with a maximum density of 80 units per acre. • **Sites 7 and 9** are currently zoned for Planned Development (PD) and will be rezoned to Residential Mixed Use (RMU) with a maximum density of 80 units per acre. • **Sites 10 and 11** are currently zoned for Planned Development (PD) and will be rezoned to Corridor Mixed Use (CMU) with a maximum density of 130 units per acre. The remaining four sites (Sites 2, 17, 18, and 19) have proposed and approved residential projects in the pipeline and will not undergo rezoning. Schedule of Action: Adopt DECRSP by the end of 2022 and rezone Sites 5, 6, 7, 8, 9, 10, 11, 13, 14, and 24 by spring 2023.				
HIP-18. Encourage and Incentivize Accessory Dwelling Units (ADUs) Assembly Bill (AB) 671 (2019) amended Government Code Section 65583, to require local agencies' Housing Elements to include a plan that incentivizes and promotes the creation of ADUs that can offer affordable rents for households with very low-, low-, or moderate-income households. In accordance with AB 671, the City shall establish a program that provides homeowners with streamlined plan review. Schedule of Action: Establish the program by the end of 2023-2024. In addition, the City will encourage the development of ADUs by developing and distributing educational materials that inform property owners of the standards for ADU development, permitting procedures, and the importance of ADUs. City staff shall distribute these promotional materials and flyers by making them available at the Permit Center and publishing them on the City's website. Schedule of Action: Prepare materials by June 2024 (end of FY 2023-2024). Distribute them on an ongoing basis and update them annually.	H3.21, H4.1 (Housing Mobility), H4.2 (Housing Mobility)	112	General Fund	Community Development Department

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
Furthermore, the City shall comply with AB 1332 by coordinating with San Mateo County (County) to receive and use a portion of the County's Permanent Local Housing Allocaduation (PLHA) funding to help fund the development of pre-approved plans and/or financing. AB 1332 requires local agencies to provide streamlined approval for "preapproved" ADU designs. AB 1332 specifies that ADU plans approved by the local agency or "other agencies within the state" (i.e. HCD), can be admitted into the local preapproval program. Additionally, the City shall research available grant funds to further incentivize ADUs for Millbrae residents. Schedule of Action: Determine application deadline, confirm eligibility, and apply for County PLHA funds by June 30, 2024. Make preapproved plans available to the public by January 1, 2025, as required by AB 1332. Moreover, Millbrae will also monitor the production and affordability of ADUs, as well as the progress made in comparison to the estimates in the Sites Inventory. If the assumptions in the Housing Element Sites Inventory are not met, the City shall identify any issues with the program and implement appropriate solutions within one year. Solutions will be selected depending on the magnitude in the gap of production and affordability compared to assumptions in the sites inventory with consideration for maintaining adequate sites throughout the planning period and may include outreach, technical assistance, funding, modification of development standards, identifying additional sites, and rezoning. Schedule of Action: Gather affordability data from property owners as ADUs are built and report on the production annually on April 1 (as part of the Housing Element Annual Progress Report). Finally, under AB 671, the City shall research the feasibility of reducing or waiving building permit fees for property owners who take advantage of the new program, and research grant funds to help fund ADUs. The City shall strive to apply for one grant every other year, as the opportunity arises. Schedule of Action: End of 6th Cycle Planning Period As described in Program HIP-44, the City will bring the Zoning Ordinance to compliance with the state's ADU requirements by 2025-2026.				

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
HIP-19. BMR Resale and Rental Controls The City shall continue to successfully work with sellers and buyers of affordable units to ensure the preservation of the affordability covenants and restrictions when any transfer occurs. When a unit becomes available for resale, the City will reach out to the seller and discuss options to continue the unit's affordability. In addition, the City shall reach out to owners of affordable units and inform them of the state preservation notice law (GOV Section 65863.10, 65863.11, and 65863.13) to ensure compliance. Schedule of Action: Inform owners of state preservation notice law by end of FY 2023-2024. Reach out to BMR owners on options to preserve affordability as units are posted for resale.	H3.7, H3.8	N/A	N/A	• Community Development Department • BAAHA
HIP-20. BMR Eligibility Guidelines The City shall continue to utilize the lottery system for affordable units, which gives preference points to individuals living or working in Millbrae. This lottery system will target affordable housing to current City employees, school district employees, and other people working in the City of Millbrae. Schedule of Action: As units become available. In addition to giving preference to Millbrae residents/workers, the City will modify the system to prioritize special needs populations, such as seniors, persons with a disability, extremely low-income housing, etc. As units become available, allocate 25% to be prioritized for residents with the highest housing needs: 20% for extremely low-income households and 5% for seniors or people w/disabilities. Schedule of Action: Update the system by the end of FY 2025-26.	H3.9, H3.14, H3.16	N/A	N/A	•Community Development Department •BAAHA
HIP-21. Services for Unhoused Persons Continue to provide funding to the San Mateo County Human Services Agency (HSA) to provide Homeless Outreach Services at the Millbrae BART Station and surrounding areas. The City will allocate funding for two full-time equivalent social workers on an annual basis (at least $200k) to assist the HSA in providing services for the Millbrae community. The HSA retained LifeMoves for one year to provide two full-time equivalent social workers/case managers, who spend time at the BART Station area and accept referrals of individuals in need of services. Services include outreach,	H3.14 - H3.15	N/A	N/A	• City Council • Administration

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
engagement, and case management services for individuals experiencing homelessness, mental health issues, and drug dependency issues. Schedule of Action: Annually by June 30.				
HIP-22. Triennial Housing Developer Meeting/Developer Outreach The City shall hold triennial meetings with affordable and market-rate housing developers (Triennial Housing Development Meeting). During this meeting, the City shall discuss how to maximize housing development by using waivers and concessions, available sites identified in the 6th Cycle Sites Inventory (City staff will update the list and map during its Annual Progress Report preparation every year by April 1) and gather feedback on the existing constraints to housing development. On the years the Triennial Housing Development Meeting does not take place, the City will outreach to all the developers on the contact list and request any new feedback they may have. Schedule of Action: Host a meeting every three years with an annual outreach to request feedback by December 31 every year. Update site inventory and corresponding map on an annual basis during the preparation of the Annual Progress Report by April 1. In addition, the City shall advertise on its website that staff can attend pre-application meetings upon request to facilitate contact with City staff and provide support. Schedule of Action: Update City's website regarding the pre-application meeting option, meetings are held as requested by applicants.	H3.3, H3.12, H4.1	N/A	None required	Community Development Department
HIP-23. Prioritize Review and Expedite the Development of Affordable and Special Needs Projects The City shall adopt a formal policy for expedited review and permitting of affordable housing developments and housing for special needs populations, (i.e., seniors, people experiencing homelessness, people living with disabilities, single female-headed households, large families, and extremely low-, very low-, low-, and moderate-income households) including Single-Room Occupancy units. Schedule of Action: By the end of FY 2028–29, the City shall adopt a policy and annually promote housing site inventory to affordable housing developers.	H3.4, H3.5, H3.14, H3.22, H4.1, H4.2	N/A	None required	Community Development Department

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
HIP-24. Encourage and Facilitate Lot Consolidation Consistent with the goals and policies of the Millbrae Station Area Specific Plan, the City shall help facilitate the consolidation of Sites 1, 4, 11, and 12 of the Millbrae Station Area Specific Plan. When a property owner of any of these sites proposes a new residential development, the City shall reach out directly to the property owners via mail and suggest lot consolidation and offer assistance to coordinate with neighboring owners. The City (with the applicant's consent) shall then contact the owners of adjacent lots on behalf of the applicant and schedule a meeting to discuss options for lot consolidation. During this meeting, the City will provide information regarding development potential, development standards, affordable housing incentives and density bonuses, and the development review and approval process. Schedule of Action: As residential developments are proposed on Sites 1, 41, 11, and 12 of the Millbrae Station Area Specific Plan. To encourage and facilitate lot consolidation across the city (not just sites within the Millbrae Station Area Specific Plan), the City will identify and later adopt developer incentives which may include but are not limited to: • Streamline the permitting and review processes • Development standards flexibility • Processing lot consolidations ministerially in order to facilitate affordable housing development • Fee waivers based on proposed affordability levels Schedule of Action: Adopt developer incentives within two years of Housing Element adoption or end of FY 2025-2026, whichever comes first.	H3.2	N/A	None required	•City Council •Planning Commission •Community Development Department
HIP-25. Parking Requirement Options in Downtown Area The City shall create an in-lieu parking fee program to address parking constraints in the Downtown Area. In-lieu parking fees will be used to build a parking garage or will be spent on other measures to manage the parking need. Schedule of Action: By FY 2027-28	H3.5, H3.22	N/A	None required	•City Council •Public Works Department •Planning Commission •Community Development Department

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
HIP-26. Coordination with Disability Rights Service Providers and Updates to Reasonable Accommodations Ordinance for People with Disabilities The City shall continue to enforce its Reasonable Accommodations policy and shall continue to work on educating developers, service providers, residents, and City planners to implement the policy more successfully. To do this, the City shall include reasonable accommodations information on its website. Schedule of Action: Update the City website by the end of FY 2023-24. In addition, the City shall provide information and gather input on the appropriateness and efficacy of the current reasonable accommodations policy during its Triennial Advocacy Meeting. On the years the Triennial Advocacy Meeting does not take place, the City will reach out to all the organizations in the contact list and request any new feedback they may have. Schedule of Action: The meeting will take place every three years with annual outreach for additional feedback by December 31 every year. Finally, the City shall amend the reasonable accommodations ordinance to remove constraints and ensure legal compliance, namely approval of findings related to privacy, adjacent neighbors, and impacts on surrounding neighborhoods/uses. Schedule of Action: Update the Reasonable Accommodations Ordinance by the end of FY 2026-2027.	H3.13, H3.16	N/A	None required	Community Development Department
HIP-27. Update Density Bonus Ordinance The City shall update its local ordinance, consistent with State law. The City's ordinance may offer a greater density bonus than allowed by the default state standards to encourage more housing development. Furthermore, the City shall continue applying the State density bonus standards until a local law is passed. Finally, the City shall continue to update the Density Bonus Ordinance as needed to remain compliant with state law. Schedule of Action: Apply state density bonus standards on an ongoing basis, as needed. Adopt an updated local ordinance by the end of FY 2025-26 and update as new state laws are adopted.	H3.5, H3.6	N/A	None required	Community Development Department

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
HIP-28. Anti-Displacement Measures Findings in the AFFH indicate a displacement risk in the northeast census tracts in the City, which have a concentration of low- and moderate-income households, voucher holders, and minority households. The City's primary displacement prevention strategy is facilitating the development of affordable housing in the community so that housing is more affordable to residents, minimizing the risk of displacement. This Housing Plan contains fourteen (14) programs to encourage and facilitate the development of affordable housing. Affordable housing development will reduce the risk of resident displacement due to an inability to afford their home. The City will implement anti-displacement measures as stated in the municipal code. The City will outreach to residents, non-profits, and local advocates to provide updates on a semi-annual basis via email, newsletters, postings in public community centers, or direct mail. Through this outreach, the City shall connect residents to resources to minimize the displacement of households with lower incomes and special needs, wherever possible, to ensure that any unavoidable relocation is conducted in a manner that is consistent with state law and provides as many resources as possible and available to those relocated. The City will provide information on its website to help connect households in need to anti-displacement organizations in the Bay Area, such as: • Housing and Economic Rights Advocates • Tenants Together Hotline • Asian Americans Advancing Justice • Center for Independence • Community Legal Services of East Palo Alto • Housing Equality Law Project • Legal Aid for San Mateo County • Project Sentinel • Housing Choices • Public Interest Law Project • Root Policy Research Schedule of Action: Include source of income protection and anti-displacement information on the City's website by the end of FY 2024-2025, and update every quarter with new information, if available. In addition, the City will directly contact residents, non-profits, and local advocates on a semi-annual basis in the form of at	H3.20	N/A	None required	Community Development Department

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
least two methods, such as email, newsletters, postings in public community centers, or direct mail.				
HIP-29. Airport Development Restrictions The City shall confer with C/CAG's Airport Land Use Commission (ALUC) to ensure that all general plans, specific plans, and zoning changes that affect real property comply with the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport under legal requirements before finalizing any such changes within the City. Schedule of Action: City staff will schedule a meeting with ALUC staff as zoning changes are proposed.	H3.17	N/A	None required	Community Development Department
HIP-30. Employee Housing The City shall continue to utilize the existing point system for residents working in the City. This system provides individuals working in Millbrae with a point on their affordable housing applications, providing them with a slight advantage in the affordable housing unit lottery system. Schedule of Action: As individuals join the affordable housing waitlist and as units become available.	H3.1	N/A	None required	Planning Department
HIP-31. Pursue State and Federal Funding for Affordable Housing The City shall sign up for the list serve emails from State (HCD, OPR, etc.), federal (HUD), and regional sources (ABAG) to identify grant application opportunities for affordable housing. Schedule of Action: By December 31, 2023. When eligible grant opportunities are identified, the City will reach out to affordable developer stakeholders, non-profits, and service providers in the Housing Element stakeholder contact list to identify projects and/or opportunities to include on grant applications and work to secure the funding. The contact list shall be updated as more stakeholders are found. Such grants may include, but are not limited to: • One Bay Area Grants awarded by the Association of Bay Area Governments	H3.4, H3.5, H3.11, H3.22	N/A	None required	Community Development Department

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
• Section 811 funding for supportive housing for extremely low-income residents provided by the Department of Housing and Urban Development (HUD) • Regional Early Action Plan Grant (HCD) • The State Infill Infrastructure Grant (HCD) • The State Multifamily Housing Program (HCD) • The State Permanent Local Housing Allocation Program(HCD) • Community Development Block Grant (CDBG), City revolving bond funds, and other sources of funding to assist with the purchase of land for affordable housing. When affordable housing projects that qualify for funding are proposed, the City will apply for, or support a minimum of, one grant application per year. The goal of this program is to increase the amount of funding available for affordable housing projects. Schedule of Action: As eligible grants become available. Apply for or support a minimum of one grant application per year, if available. *Disclaimer – Completing the tasks and activities referenced in this program will be dependent upon available local, state, and federal funding sources.*				
HIP-32. Local Funding for Affordable Housing The City shall continue to allocate commercial linkage and housing in-lieu fees for extremely low-, very low-, low-, and moderate-income housing. Funding can be used for new construction, acquisition, and rehabilitation of affordable housing, as well as other housing programs such as mortgage assistance. Schedule of Action: As funding is available and developers' requests are received. To increase transparency for developers, the City shall also provide information to attendees on available funds during the Triennial Housing Development Meeting, per Program HIP-22 of this Housing Element. The information provided shall include available funds and a projection for the following 3 years. In addition, the City shall follow up with attendees and provide documentation of the available funding for affordable housing development.	H3.4, H3.5, H3.11, H3.14, H3.22	N/A	• Commercial Linkage Fees • Inclusionary Housing In-Lieu Fees	Community Development Department

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
Schedule of Action: Every three years by December 31 with annual outreach on the years the meeting does not take place. This program addresses the need for certainty for affordable housing developers. By knowing what is and may be available for them in the future, the feasibility of affordable housing is improved, resulting in more development.				
HIP-33. Allocate CDBG Funding for Housing The City shall continue to participate in the San Mateo County HOME Consortium and shall apply to receive Community Development Block Grant (CDBG) for an annual allocation for housing programs, consistent with the San Mateo County HOME Consortium Consolidated Plan and Annual Action Plan requirements. Schedule of Action: Annually.	H3.4, H3.14	N/A	CDBG	Community Development Department
HIP-34. Facilitate Access to Affordable Housing for Residents The City shall invite housing property managers and housing advocates to the Triennial Advocacy Meeting proposed in Program HIP-1. During this meeting, the City shall discuss the creation/improvement of a referral system to available affordable housing units with affordable housing property managers and housing advocates. On the years the Triennial Advocacy Meeting does not take place, the City will outreach to all the organizations in the contact list and request any new feedback they may have. Schedule of Action: Meet every three years and request feedback every year by December 3.1 In addition, the City shall continue to maintain the City's webpage and develop a list-serve email system that informs advocates and residents of each property's waitlist status, application requirements for each property, etc. Schedule of Action: Create a list-serve by the end of FY 2023–24 and update the website at least once every two years.	H3.4, H3.14	N/A	None required	Community Development Department

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
HIP-35. Assist with the Development of Lower-Income Housing The City will offer the following incentives for the development of affordable housing, including but not limited to the following: • The City shall adopt a process to streamline and expedite the approval process for affordable housing projects with at least 50% of units at affordable prices/rents, consistent with state law. Schedule of Action: Within one year of Housing Element certification. • The City shall continue to waive in-lieu fees on 100% affordable units. In addition, the City shall work with qualified applicants to prepare an analysis that determines the feasibility of reducing permitting fees for housing projects that are 100% affordable to reduce factors that can render an affordable housing development financially infeasible, thereby constraining the development of affordable housing. The City shall commit to reducing fees if the analysis determines the reduction of fees is feasible. Schedule of Action: Within three years of Housing Element certification. • The City shall provide technical assistance to developers on funding applications, as projects are proposed. Schedule of Action: Ongoing as projects are proposed and assistance is needed (specific timing dependent on development community).	H3.4, H3.5, H3.14, H3.22, H4.1, H4.2	N/A	None required	Community Development Department
HIP-36. Funding, Incentives, and Concessions for Extremely Low-Income Developments The City will undertake the following actions during the planning period: • *Developer Meetings:* Hold the Triennial Housing Development Meeting established in Program HIP-22 (by December) to discuss available funding sources (City, State, and federal), available sites identified in the Housing Element, developer needs, and opportunities for affordable housing projects. Outreach will include experienced developers with recent affordable housing project experience that includes units affordable to extremely low-income households and households with special needs. On the years the Triennial Housing Development Meeting does not take place, the City will outreach to all the developers in the contact list and request any new feedback they may have. Schedule of Action: Every three years with annual outreach to request additional feedback by December 31 each year. • *Assistance to Developers – Funding and Concessions:* Prioritize funding for housing developments affordable to extremely low-income households and identify	H3.14	N/A	• Commercial Linkage Fees • Inclusionary Housing In-Lieu Fees • General Fund	Community Development Department

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
feasible financial incentives and regulatory concessions to encourage the development of different housing types (including multifamily and single-room occupancy projects). The City shall follow up with attendees and provide documentation on the available assistance for affordable housing development. Schedule of Action: Every three years by December 31 (during the Triennial Housing Development Meeting) and as requested. Follow up within 30 days of the meeting. • *Other Technical Assistance to Developers:* Provide technical assistance to developers regarding the City's lower-income sites, funding opportunities, as well as mixed-use zoning and density bonus incentives (make the availability for technical assistance known to developers at the Triennial Housing Development Meeting referenced above). The City shall follow up with attendees and provide documentation on the availability of technical assistance and steps that shall be taken to receive such assistance. Schedule of Action: Every three years by December 31 (during the Triennial Housing Development Meeting) and as requested. Follow up within 30 days of the meeting. • *Funding Alerts: City staff will sign up to receive regular alerts and communications about State and federal funding* opportunities (from HCD, HUD, and other entities) for affordable housing development, including extremely low-income housing units. Schedule of Action: by December 31, 2023. • *Grant Applications:* City staff will apply for or support a minimum of one grant application per year for affordable housing (including extremely low-income housing units), as they are available. To date, grant opportunities for cities have been limited to SB 2 and LEAP. The remainder of available grants require developers to apply for specific projects (meeting stringent criteria) rather than local jurisdictions. City staff will meet with the County Housing & Community Improvement Department each year to identify additional funding opportunities for affordable housing activities. Schedule of Action: One application per year, as they are available. The goal of this program is to offer all available concessions, technical assistance, and funding assistance to housing projects that include lower-income housing units to improve the financial feasibility of those projects, allowing the projects to be implemented rather than abandoned due to financial infeasibility.				

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
Disclaimer – completing the tasks and activities referenced in this program will be dependent upon available local, State, and federal funding sources.				
HIP-37. Advertise Available Resources The City shall publish affordable housing funding opportunities available to developers on the City's website, disseminate them via targeted email notifications, and post them on all City social media accounts. Advertisements should also include information on the availability of sites with the best potential for development. Schedule of Action: Annual update by December 31.	H3.11	N/A	None required	Community Development Department
HIP-38. Legal Assistance for Renters and Support for Fair Housing Services Provider The City will continue to contract with Project Sentinel (a nonprofit fair housing provider the City currently contracts with) for fair housing services for City residents. Schedule of Action: Annually. The City will also provide fair housing information including fair housing education, counseling, investigation, conciliation, advocacy, and enforcement services provided by Project Sentinel, Legal Aid Society of San Mateo County, Community Legal Services of East Palo Alto, Peninsula Conflict Resolution Center, and Samaritan House in the following manner: • City's website – external links. • City's social media accounts – announcements that information is available on City's website. • Targeted emails to community organizations that work with special needs populations and residents – announcements that information is available on City's website. Schedule of Action: Ongoing with an annual review of information and annual outreach/updates by December 31. Additionally, the City shall also post Appendix B, Affirmatively Furthering Fair Housing Analysis, of this Housing Element as well as information and resources for reporting suspected violations and obtaining remedies on the City's website.	H3.20	N/A	None required	Community Development Department

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
Schedule of Action: Within 6 months of Housing Element certification by HCD and update annually by December 31. Finally, the City shall meet with Project Sentinel to discuss funding needs for fair housing services and determine the needs of the organization to help maintain appropriate assistance for residents. Schedule of Action: End of FY 2023–24.				
HIP-39. Meet with Service Providers and Advertise Employment Resources for Persons with Disabilities The City shall reach out directly to local disability service providers and meet every three years during the Triennial Advocacy Meeting under Program HIP-1. During the meeting, the City will gather data on employment resources for persons with disabilities and compile a list of available resources to include on its website. Additionally, the City will discuss other needs for persons with disabilities and gather feedback. Furthermore, following the meeting, the City shall reach out to attendees and request that resource information is directly shared with the residents that the organizations are providing services to. On the years the Triennial Advocacy Meeting does not take place, the City will outreach to all the organizations in the contact list and request any new feedback they may have. Schedule of Action: Outreach to service providers and compile a list of resources by December 31, 2023. Meet with service providers and update resources every three years with an annual follow-up on the years there is no meeting by December 31. Reach out to attendees within 30 days of the meeting and ask that they directly reach out to residents within 30 days of the City's contact.	H3.19	N/A	None required	Community Development Department
HIP-40. Collaboration with San Mateo County Vocational Rehabilitation Services The City shall reach out to the San Mateo County Vocational Rehabilitation Services (SMCVRS) to discuss program needs and opportunities for collaboration, such as a referral program, funding allocation, or advertising on the City's website. The City shall seek to increase services and improve employment access to persons with disabilities. Schedule of Action: Outreach to and meet with SMCVRS by the end of FY 2024-25. In addition, the City shall invite SMCVRS to its Triennial Advocacy Meeting under Program HIP-1 to discuss the needs of persons with a disability and opportunities to	H3.18, H3.19	N/A	None required	Community Development Department

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
provide support. The City shall also reach out to the SMCVRS and request any new feedback they may have on the years the meeting does not take place.				
HIP-41. Implement the City's Economic Development Plan The City shall continue to implement the Millbrae Economic Development Plan to provide adequate job opportunities to the community. Specifically, the City shall further focus its efforts of implementation on Objective 2, Job Diversification. This objective aims to provide opportunities for residents to work closer to home and to diversify the job base to encourage more local service and boutique activity centers. Specifically, the City shall evaluate the 2013 Economic Development Plan's strategies to identify potential improvements for the creation of employment opportunities for persons with disabilities. Schedule of Action: Review Economic Development Plan and identify improvements within two years of Housing Element certification.	H3.19	N/A	None required	Community Development Department
HIP-42. Implement Reduced Parking for Affordable Housing The City shall continue to implement state law about parking minimums for affordable multifamily housing projects within ½ mile of high-frequency transit. This will facilitate and encourage the development of affordable housing by reducing requirements for affordable housing developers. Schedule of Action: As projects are proposed.	H3.4, H3.5	N/A	None required	Community Development Department
HIP-43. Update the City's Zoning Ordinance and Specific Plans Related to Emergency Shelters, Low-Barrier Navigation Centers, Transitional and Supportive Housing, and Group Care Facilities to Comply with Current Laws The City will review and update the Zoning Ordinance and Specific Plans, as well as related policies about emergency shelters, Low-Barrier Navigation Centers (LBNCs), transitional and supportive housing, and group care facilities to conform to State requirements, as established by AB 101 (2019), AB 139 (2019), AB 2162 (2019), Senate Bill (SB)48, and AB 2339 (2022). Generally, this update would allow these land uses in all of the City's residential zones and with fewer conditions. Specifically, the Zoning Ordinance would be amended to: • **Emergency Shelters (allowed by right in Commercial and Industrial Zones):** ○ Modify parking requirements to be limited to staff working at the facility, rather than 0.35 spaces per bed (rounded to the nearest space) plus one space per employee. This will also help recognize transitional and supportive housing	H3.17, H3.15, H3.25	N/A	None required	Community Development Department

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
projects as residential use of the property subject to the same restrictions as other residential property within the same zone; ○ Modify the ordinance to remove the limit on the number of beds and allow for more than 10 beds in emergency shelters; ○ Modify the ordinance to remove the requirement that limits emergency shelters from being closer than 300 feet to another emergency shelter. ○ Modify the ordinance to allow emergency shelters by-right in R-3 zones. ○ Consistent with GOV Section 65583 as amended by AB 2339, the City will amend the definition of "emergency shelters" to align with statutory definitions, identify zoning districts where residential and/or mixed uses are allowed to also allow emergency shelters as a permitted use without a conditional use permit or other discretionary permit, craft objective standards consistent with Government Code section 65583(a)(4) and related applicable state law, and continue to ensure adequacy of sites to accommodate the need for emergency shelters. • **Emergency Shelters, Transitional & Supportive Housing, and Low-Barrier Navigation Centers:** ○ Modify the Zoning Ordinance to remove requirements limiting Emergency Shelters and Transitional & Supportive Housing to Commercial and Industrial Zones only and allow for them to be permitted by-right in zones where multifamily and mixed-use developments are permitted. ○ Modify the Zoning Ordinance to explicitly permit Low Barrier Navigation Centers by right in mixed-use zones and other nonresidential zones permitting multifamily residential development. The current ordinance is silent on this land use, so the City will be adding the allowance to comply with AB 2162 and AB 101. ○ Currently, emergency shelters are allowed by-right in and without discretionary action throughout the Downtown and El Camino Real Specific Plan area, commercial zones, and industrial zones. The Zoning Ordinance will be updated to allow emergency shelters by-right and without discretionary action in the Millbrae Station Area Specific Plan areas. • **Group Care Facilities/Residential Care Facilities:** ○ Modify the Zoning Ordinance to allow residential care facilities serving six or fewer people by-right in all residential zones, treat them the same way as any other residential use, and subject them to the same development standards. Currently, residential care facilities are allowed by-right in R-1, R-2, and R-3.				

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
However, they are not allowed by-right in the Downtown and El Camino Real Specific Plan areas. The Zoning Ordinance will be updated to allow them by-right in both specific plan areas. ○ See program HIP-45 addressing state-regulated residential care facilities. Schedule of Action: End of FY 2028–29.				
HIP-44. Update the City's Zoning Ordinance The City is in the process of updating its Zoning Ordinance, which will incorporate changes in state law (particularly affordable housing, SROs, manufactured homes, mobile homes, employee housing, emergency shelters, transitional/supportive housing, and ADUs). • **Single Room Occupancy (SROs)**- No changes needed in Zoning Ordinance. See Program HIP-23 for expediting permit processing for SROs. • **Manufactured housing/Mobile Homes**- Modify the Zoning Ordinance to specify that manufactured housing is processed with similar requirements to single-family residential, as required by California Government Code Section 65852.3. • **Employee housing** – Modify the Zoning Ordinance to comply with the California Employee Housing Act (Section 17000 of the California Health and Safety Code). • **Emergency Shelters** – As described in Program HIP-43, the City will review and update the Zoning Ordinance to comply with state legislation, particularly AB 2339. • **Transitional/Supportive Housing** – As described in Program HIP-43, the City will review and update the Zoning Ordinance to comply with state legislation. • **Accessory Dwelling Units (ADUs)** – The City last updated its ADU ordinance in 2020; and now has an up-to-date ordinance considered compliant with Government Code Section 65852.2. Schedule of Action: End of FY 2026-27.	H3.5, H3.22	N/A	None required	Community Development Department
HIP-45. Update the Zoning Ordinance, MSASP, and DECRSP to Comply with Residential Care Facilities Requirements The City will review and update the City's Zoning Ordinance (including within the MSASP and DECRSP) to allow state-regulated residential care facilities by right in accordance with California Health and Safety Code, Section 1500. Specifically, City shall amend the Zoning Ordinance to explicitly permit state-regulated residential care	H3.4, H3.13, H3.14, H3.16	N/A	None required	Community Development Department

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
facilities by-right in zones R-1LL, R-1, R-2, and R-3, to comply with state law, except in areas where this conflicts with the Safety Policies of the SFO Airport Land Use Compatibility Plan. Currently, residential care facilities are allowed by-right in R-1, R-2, and R-3. However, they are not allowed by-right in the Downtown and El Camino Real Specific Plan areas. The Zoning Ordinance will be updated to allow them by-right in both specific plan areas. In addition, the Zoning Ordinance will be updated to address zoning for group homes for seven or more persons regardless of licensing and allow these uses in any zone that permits residential uses and only subject to those restrictions that apply to similar residential uses of the same type in the same zone. Schedule of Action: End of FY 2026–27.				
HIP-46. Provide Information and Examples of Incentives/Concessions for Developers To expedite the process of finding resources and incentives, the City shall gather information, including feedback from the Triennial Housing Development Meeting proposed in Program HIP-22 of this Housing Element, on the existing incentives/concessions available to developers. Schedule of Action: Within three years of Housing Element certification. The City shall then develop and post information and examples of the existing incentives/concessions available to housing developers on the City's website and update the information on an annual basis. Schedule of Action: Post annually by December 31. The goal of this program is to expedite the time it takes to obtain development approvals and provide incentives that result in cost savings on housing projects, thereby improving, and increasing the financial feasibility of affordable housing projects.	H3.22	N/A	None required	Community Development Department

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
HIP-47. Maintain/Update the Site Inventory The City shall provide adequate residential and mixed-use designated sites to accommodate the City's 6th Cycle RHNA of 2,199 units (575 very low-, 331 low-, 361 moderate-, and 932 above-moderate-income units) through the following actions: • *Verify Inventory*: The City will maintain a residential site inventory of the City's RHNA and update this inventory as projects are reviewed/approved/constructed, to ensure sufficient residential capacity is maintained to accommodate the identified need. Schedule of Action: Annually through the HCD Annual Progress Report (APR) effort. • *Accommodate Shortfall:* Should a development approval result in a reduction of the total capacity below the residential capacity needed to accommodate the remaining RHNA need for lower-income households (beyond the existing buffer), the City will identify sufficient sites to accommodate the shortfall. Schedule of Action: As needed with an annual check by April 1 (coinciding with the APR due date). • *Mid-Cycle Review:* The City will evaluate planned, approved, and pending projects (pipeline) for progress toward completion in the planning period. In addition, the City shall evaluate the progress toward implementing the programs of this 6th Cycle Housing Element. If pipeline projects or programs are not progressing toward completion in the planning period, the City shall take the necessary steps to accommodate the RHNA (e.g., identify additional sites or rezoning) and ensure satisfactory progress of programs. Schedule of Action: Perform an in-depth review by April 1, 2028, during the preparation of the 2027 APR and take the necessary steps by December 31, 2028.	H3.22	N/A	General Fund	Community Development Department

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
HIP-48. Reduced Parking Requirements The City shall complete a parking study and use the findings as a basis to amend the Zoning Ordinance to reduce minimum parking requirements for multifamily and mixed-use projects. The amendments will meet the requirements of AB 2097 (2022) and achieve further adjustments in other areas based on study results to ensure that parking requirements do not constrain housing development, including but not limited to development costs that arise from excessive parking requirements and achieving the maximum allowed density. In addition, the City will update the Zoning Ordinance to remove garage parking requirements for multifamily development and offer flexible or alternative parking arrangements to facilitate multi-family housing and mixed use construction, such as tandem parking and shared parking. Schedule of Action: Complete parking study by December 2028 and adopt the zoning ordinance amendments by December 2029	H3.5, H3.22	N/A	General Fund	Community Development Department
HIP-49. Citywide Objective Residential Design Standards. Recent changes to State law require all residential development applications to be reviewed and approved based on clearly defined objective design and development standards. This implementation of objective design standards will expedite the development and design review processes and accelerate residential development. The Planning Division will work to select a planning and design firm to help develop and codify objective design standards for single-family, multi-family and mixed-use residential development. The goal is to develop objective architectural design standards that recognize and preserve the neighborhood character and historic context of all Millbrae neighborhoods. Schedule of Action: This project is underway and expected to be completed in FY 2024-2025.	H3.22	N/A	General Fund	Community Development Department

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
HIP-50. Inclusionary Housing Impact Fee Study The City will prepare an updated Inclusionary Housing Study to examine the feasibility and economic impact of increasing the City's affordable housing requirement for multi-family residential projects from 15% to 20%. The preparation of this study will help inform the Council about the financial feasibility for market rate housing development related to potentially increasing the inclusionary requirement. A financial feasibility analysis is required by State law if the very low- and low-income inclusionary housing requirement combined exceeds 15%. Schedule of Action: The preparation of the study will begin at the end of FY 2023-2024 and will be brought before the City Council for consideration for potential action to approve an amendment to the inclusionary housing ordinance if the study finds that an increase is feasible and will generate more affordable housing.	H3.4, H3.14	N/A	General Fund	Community Development Department
HIP-51. Streamline the Permit Processing and Approval Process for Residential Development City departments will work together to review vendors and develop a new City-wide permit tracking software system that improves customer service and efficiency. This project is expected to assist developers and residents with ease of obtaining permits. The software will feature an online submittal portal, digital plan check routing, and integration with existing software and systems. Modules will be established for Building, Engineering, and Planning with potential future expansion for Code Enforcement, Water and Sewer. Establishing new permitting software is a multi-year effort funded through the 7% tech fee applied to the valuation of all building permits. This project will cost approximately $750,000 in FY 2023-2024 for initial set up and final implementation during FY 2024-2025. The total anticipated costs for set up and implementation is $1,000,000, with subsequent annual license and programming maintenance costs. Schedule of Action: This project is now underway for an initial set up in FY 2023-2024 and final implementation during FY 2024-2025.	H3.22	N/A	General Fund	Community Development Department

Goal H-4: Equal Access to Housing / Housing Mobility

To ensure that all economic segments of the Millbrae community have equal and fair housing opportunities at the local and regional levels. In addition to the programs proposed for goals H-1 through H-3, the City will implement a suite of actions to improve housing mobility and affordability.

Policies

- **H4.1: Maximize Housing Choice.** Ensure that all Housing Element programs are implemented to maximize housing choices for all residents.
- **H4.2: Facilitate Housing Development for Housing Mobility.** Facilitate the development of a variety of housing types to foster housing mobility.
- **H4.3: Employ Strategies for Neighborhood and Infrastructure Improvements.** Seek out the improvement of less affluent communities in the City to create opportunities within all neighborhoods.

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
HIP-52. Pilot City Mortgage Assistance Program The City will develop a Pilot City Mortgage Assistance Program for City Council consideration. Staff will recommend the establishment of a task force to study the feasibility of the program and projected fund availability. In addition, the task force shall develop the eligibility criteria, application process, terms of mortgage assistance, and other program details. The City Mortgage Assistance Program will provide affordable homeownership opportunities for residents who may face challenges in affording a home in affluent areas. If/when established, the City Mortgage Assistance program shall be funded using the City's Enterprise Fund or other eligible sources. Schedule of Action: Propose the creation of a task force by the end of FY 2024-2025. If approved, the City Mortgage Assistance Program shall be established by the end of FY 2025-2026.	H4.1, H4.2	N/A	• Enterprise Fund or other eligible sources	City Administration
HIP-53. Additional Density Bonus Incentives The City will prepare incentives to enable additional allowances for density bonuses in exchange for more affordable units at deeper affordability levels. Pending Council approval, the package of incentives will increase the number of affordable units built across the City and, therefore, create more housing opportunities to support mobility. Schedule of Action: Prepare a package of incentives and present it to City Council by the end of FY 2025-2026 and implement (if approved) by the end of FY 2026-2027.	H4.1, H4.2	N/A	None required	Community Development Department
HIP-54. Allow Additional Affordable Housing in P-D Zones The City will continue to allow affordable units in parcels with Planned Development (PD). This incentive shall be available to developments that comply with General Plan density. Schedule of Action: As projects get proposed and the City connects with developers.	H4.1, H4.2	N/A	None required	Community Development Department

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
HIP 55 – Housing Mobility The City will enhance housing mobility and foster increased housing options and affordability across Millbrae by implementing a set of targeted actions in lower density areas. These actions will involve outreach, allocation of resources, and other strategies, all aimed at the overarching objective of broadening affordable housing opportunities for extremely low, very low, low, and moderate-income households. Actions include: • **Housing Mobility Coordinator** - The City shall work with 21 Elements and HEART of San Mateo County, along with other member cities, to identify and hire a shared staff person who will assist with Housing Element program implementation and housing mobility services. The housing mobility coordinator shall provide housing mobility counseling, such as information on opportunity areas, housing search skills and tools, workshops, one-on-one research assistance, referrals, landlord-tenant mediation, and retention counseling. Schedule of Action: Establish a housing mobility coordinator by FY 2024-2025. • **Facilitate the provision of housing on sites affiliated with religious institutions or faith-based organizations** – The City will conduct annual outreach with religious institutions that own property in the City to provide information on SB4 (Yes in God's Backyard) and the ability to develop housing by right. The City will also facilitate a specialized streamlined processing approach for housing applications on sites associated with religious institutions or faith-based organizations. In the event that no housing application on a religious institution/faith-based site is received by December 2026, the City will enhance outreach efforts to add direct mailings to faith-based sites, showcasing successful affordable housing units on similar sites, and providing information on available City grants and loans for housing and human services initiatives. Objective: to permit 10 housing units, with a target of 60 percent of units located in lower-density areas, during the planning period from 2023 to 2031. Schedule of Action: Mid-cycle progress check-in; annual outreach beginning in December 2024.	H3.21, H3.22, H4.1 (Housing Mobility), H4.2 (Housing Mobility)	(2) home-sharing applications and (1) placement annually; (5) JADUs over the planning cycle through the conversion of short-term hosted rentals; (3) ADU applications annually; (40) units during the planning cycle assuming (5) ADUs annually in addition to the (9) ADUs permitted in 2023	General Fund	Community Development Department

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
• **SB 10** - Identify potential sites outside of the downtown Core Area that meet the statutory requirements for transit-rich areas and urban infill sites requirements for consideration pursuant to SB-10 in order to facilitate development applications in these areas. Amend development standards related to the above action if necessary to facilitate maximum densities as part of housing mobility actions. Objective: to permit 40 housing units, with a target of 60 percent of units located in lower-density areas, during the planning period from 2023 to 2031. Schedule of Action: December of 2028. • **Home-sharing** – Per Program HIP-12. Advertise Human Investment Project (HIP) Home-Sharing Program to Residents, the City will continue to support HIP Housing (a non-profit housing organization in San Mateo County focused on poverty and homelessness) by providing information on the City's website. While the City does not run the program and cannot provide direct services to residents, the City shall assist HIP with targeting information at least once per year to higher-income and single-family neighborhoods where lower-income sites are not identified. To assist HIP with general advertisements, staff shall utilize the City's website, social media, and monthly newsletter. The City shall utilize each medium at least once per year, resulting in three (3) general advertisements per year. To assist HIP with targeted advertisements, staff shall send information to the targeted neighborhoods using the City's utility bill mailing. In addition, the City shall reach out to homeowners associations in the targeted neighborhoods. The City shall utilize each medium at least once per year, resulting in two (2) targeted advertisements per year. Objective: Complete (3) general advertisements (2) targeted advertisements annually. Schedule of Action: Update City's website with current links and information, post on social media, and advertise in the City's monthly newsletter at least once per year by December 31. Complete two targeted advertisements per year through the City's utility bill and homeowners associations by December 31.				

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
• **Encourage and Incentivize Accessory Dwelling Units (ADUs) and other "missing middle" housing** – Under Program HIP-18. Encourage and Incentivize Accessory Dwelling Units (ADUs), the City shall establish a program that provides homeowners with streamlined plan review. The City will encourage the development of ADUs by developing and distributing educational materials that inform property owners of the standards for ADU development, permitting procedures, and the importance of ADUs. City staff shall distribute these promotional materials and flyers by making them available at the Permit Center and publishing them on the City's website. The City will continue to work with 21 Elements to coordinate on the development and usage of pre-approved ADUs and the creation of the ADU Resource Center website. Upon finalization of the website, the City will provide a link on the City's website to the 21 Elements hosted website providing information and resource materials on ADUs. Objectives: (3) applications annually, (40) units during the planning period assuming (5) ADUs annually in addition to the (9) ADUs permitted in 2023. Schedule of Action: Establish the program by the end of 2024-2025; Prepare materials by June 2024 (end of FY 2023-2024). Distribute them on an ongoing basis and update them annually. • **Amend ADU Ordinance to allow 2 JADUs per single family residence** - to encourage additional infill development in single family areas, the City will amend the ADU Ordinance to allow up to two JADUs in any single family residence. Objectives: (10) applications annually, (55) units during the planning cycle assuming (8) JADUs annually. Schedule of Action: Establish the program by the end of 2025-26; Prepare materials (as part of the ADU resource materials referenced in the bullet point above) by September 2026. Distribute them on an ongoing basis and update them annually. • **Missing-Middle Housing and Housing Mobility Education -** The City will generate virtual and printed materials to educate property owners in single-family residential areas of the City on the benefits of Accessory Dwelling Units,				

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
and SB 9 subdivisions,. The City will also generate educational materials to landlords regarding SB 329 (2019). SB 329 classifies voucher income as a "source of income" under the California Fair Employment and Housing Act, which prohibits housing discrimination based on sources of income. Schedule of Action: June 2025. Following the creation of educational content and materials, the City will post information on its Housing Programs webpage. Additionally, the City will utilize alternative methods, such as the City's quarterly printed newsletter, that is distributed to all households, to further publicize the information. Schedule of Action: June 2025. In addition to publishing such materials, the City shall utilize its public information campaign to educate and engage single-family property owners on the opportunities available for housing development. As a part of this campaign, the City shall utilize the presentations proposed in Program H-2.E to spread awareness and present this information to a minimum of one community group meeting or public event per year. Schedule of Action: Bi-annually by December 31. • **Conversion of Short-Term Hosted Rental to JADU** – The City will encourage the conversion of short-term rentals to long-term JADUs through annual outreach efforts to property owners with short-term rentals (including those facing the downturn in Airbnb rentals) to facilitate the development of housing, increasing the stock of housing available in the City. The City will reduce the permitting fees for JADUs if the dwelling is already an existing permitted short-term rental. Objectives: Development of (5) JADUs over the planning cycle through the conversion of short-term hosted rentals. Schedule of Action: Bi-annual outreach to short-term rental property owners with permit renewal starting in 2025. • **Amnesty Program** – the Metropolitan Transportation Commission (MTC) new Transit-Oriented Communities (TOC) Policy requires jurisdictions to adopt				

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
certain policies and programs in order to be eligible for funding. One of MTC's program options include the establishment of an amnesty program to reduce fines and fees for property owners with occupied units constructed without the proper permits in exchange for bringing the unit into compliance with health and safety codes. Prior to making repairs, the property owner must complete a tenant habitability plan describing how they will maintain habitability for the tenant and any adjacent units while repairs are being performed. If the tenant needs to be relocated for repairs, the plan discusses how the landlord will assist with temporary relocation, which must include offering a nearby available unit at same rent (if landlord owns other properties), paying for moving expenses, and providing relocation assistance to pay for the cost of temporary housing. As a condition of receiving amnesty for fines and fees, the property owner must agree to continue renting to the existing tenant after repairs are complete with reasonable limits on rent increases for that tenant. Objectives: Bring five (5) units into code compliance during the 6th Cycle planning period. Schedule of Action: Annual outreach to eligible property owners through Code Enforcement starting in 2025. • **Additional Density Bonus Incentives** – Per Program HIP-53. Additional Density Bonus Incentives, the City will prepare incentives to enable additional allowances for density bonuses in exchange for more affordable units at deeper affordability levels. Pending Council approval, the package of incentives will increase the number of affordable units built across the City and, therefore, create more housing opportunities to support mobility. Schedule of Action: Prepare a package of incentives and present it to the City Council by the end of FY 2025-2026 and implement (if approved) by the end of FY 2026-2027. • **Objective Design Standards** – Per Program HIP-49. Citywide Objective Residential Design Standards, the Planning Division will work to select a planning and design firm to help develop and codify objective design standards for single-family, multi-family, and mixed-use residential development. The goal is to develop objective architectural design standards				

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
that recognize and preserve the neighborhood character and historic context of all Millbrae neighborhoods. Schedule of Action: This project is underway and expected to be completed in FY 2024-2025. • **Marketing Housing Resources and Opportunities** – The City will continue offering housing education programs and information through various channels, including the City's website, public venues, City publications, mailings, social media accounts, and collaborations with other organizations, including 21 elements. The City will provide a link to the 21 Elements website on the City's Affordable Housing webpage to help provide residents with access to information and housing resources provided by 21 Elements. Schedule of Action: Ongoing; update the City's webpage by March 2024. • **Mid-Cycle Review for Program Efficacy** - In addition to the annual review with the City Council in preparation for the annual progress report to HCD, the City will conduct a mid-cycle review of program effectiveness and accomplishments in 2028. The City will consider alternative strategies and program enhancements to improve progress if performance is less than satisfactory. Schedule of Action: Mid-Cycle review to be performed by December 2028.				
HIP-56. Provide New Housing Choices in Lower-Density Neighborhoods Through Incentives for SB9 Units in R1-Zone Neighborhoods The City shall adopt a local ordinance implementing SB9, which shall establish an administrative process without any discretionary action. SB9 will open up the possibility for property owners to construct up to 4 units through a multi-step process and create more housing choices and affordability in some of the most affluent areas of the City. Once adopted, the ordinance shall be advertised to Millbrae homeowners in R-1 zones. For general advertisement, staff shall utilize the City's website, social media, and monthly newsletter. The City shall utilize each medium bi-annually, resulting in three (3) general advertisements every two years.	H4.1, H4.2	N/A	General Fund	Community Development Department

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
For targeted advertisements, staff shall send information to the targeted neighborhoods using the City's utility bill mailing. The City shall utilize this medium bi-annually, resulting in one (1) targeted advertisement every two years. Schedule of Action: Adopt local ordinance by the end of FY 2023-2024. Update City's website with current links and information, post on social media, and advertise on the City's monthly newsletter bi-annually by December 31. Complete one targeted advertisement bi-annually through the City's utility bill by December 31.				
HIP-57. By-Right Approval on Reuse Sites City staff shall propose to establish a procedure that would provide by-right approval on projects on reuse sites (those identified in previous housing elements. By-right approval is dependent upon City Council approval. Schedule of Action: Propose procedure to City Council by the end of FY 2026-2027.	H4.1, H4.2	N/A	None required	Community Development Department
HIP-58. Tools for Financing Infrastructure and Development The City shall study and report to City Council on the feasibility of establishing an Enhanced Infrastructure Financing District (EIFD), Community Revitalization Investment Authority (CRIA), Community Benefits District, or similar tax increment financing program. These tools shall enable the City to invest in redevelopment and increase opportunity in all areas of the City. If established, the City would have the ability to directly fund and support the development of housing and supporting infrastructure. Following the study and report, City staff shall propose an appropriate financing program for City Council approval. Schedule of Action: Report to City Council within three years of Housing Element certification and, if the Council decides to move forward, adopt a financing tool by the end of the 6th Housing Element Cycle. The City will pursue the development of a downtown business association and improvement district responsible for the management and funding of property maintenance, parking management, marketing, and economic development in the downtown area. An estimated $150,000 will be needed to help establish the groundwork for a business improvement district program. This project is now underway with a Council-approved contract.	H4.1, H4.2, H4.3	N/A	General Fund	City Administration

Implementation Program	Policies Implemented	Quantified Objectives	Potential Funding	Who is Responsible
Schedule of Action: Establish the downtown business association and improvement district within three years of Housing Element certification.				
HIP-59. Eastside Specific Plan Development The City shall develop a comprehensive Eastside Specific Plan that examines opportunities and constraints for infrastructure, circulation, and land use. Following the selection of a consultant team with experience in land use and engineering, the phased project will begin with the development of a concept plan containing an infrastructure and needs assessment and conceptual land use plan. The first phase of the multi-year East Side Specific Plan project will be allocated $250,000, with additional funding to be allocated the following fiscal year as the project advances to subsequent phases. Schedule of Action: Select a consultant team by the end of FY 2024-25, develop a concept plan by the end of FY 2025-26. As part of the Eastside Specific Plan, the City will focus on upgrading the Bayside Manor and Marina Vista Parks to better serve the needs of the Eastside neighborhood. Improvements include an addition of new sports courts and facilities, lawn area, playground, picnic area, and trees and landscaping. Schedule of Action: Complete upgrades by the end of FY 2027-28	H4.3	N/A	Long Range Planning Fund	City Council City Administration

8.2 Quantified Objectives

California Government Code, Section 65583(b)(2), requires jurisdictions to identify the maximum number of housing units by income category (including extremely low income) that can be constructed, rehabilitated, and preserved over five years. The City has two sets of numerical housing goals:

- Millbrae's portion of the Association of Bay Area Governments Regional Housing Needs Assessment goals
- Quantified objectives for affordable housing production

State law recognizes that housing needs may (and do) exceed available resources and, therefore, does not require that the City's quantified objectives be identical to the identified housing needs (or RHNA). More specifically, the California Government Code, Section 65583(b)(2), states the following:

It is recognized that the total housing needs *"…may exceed available resources and the community's ability to satisfy this need within the content of the general plan requirements."* Under these circumstances, the quantified objectives need not be identical to the total housing needs. The quantified objectives shall establish the maximum number of housing units by income category, including extremely low income that can be constructed, rehabilitated, and conserved.

The acknowledgment of the funding limitations is extremely important—cities and counties are required to prepare Housing Elements every eight years to identify needs and actions to provide for housing at all income levels and for all populations despite a severe shortage in local, State, and Federal funding that makes many of the actions needed and planned financially infeasible. It is important to recognize that State law requires cities to plan for housing, but almost all housing is developed by the private sector.

Although cities must establish quantified objectives for the actual creation of affordable housing opportunities and provision of other housing assistance (based on realistic assumptions), these objectives need not be identical to the total housing needs (i.e., RHNA). The quantified objectives, or several affordable units that will realistically be created, as shown in Table 8-1, Quantified Objectives, provide a projection for the entire eight-year 6th Cycle Housing Element period. These numbers reflect the planned and approved units as of August 31, 2022.

Table 8-1. Summary of Quantified Objectives for City Housing Programs, 2023-2031

Program/Activity/Action	Extremely Low	Very-Low	Low	Moderate	Above Moderate	TOTAL
RHNA Allocation	**575**		**331**	**361**	**932**	**2,199**
New Construction	52	51	190	77	1,443	**1,813**
Code Enforcement (Substandard & Blighted Housing)					224	**224**
Conservation and rehabilitation	2	2	8	3	64	**80**
Rental Assistance (Section 8)	76	15	4			**95**
Homeowner Assistance				4	4	**8**
TOTAL	**199**		**202**	**84**	**1,735**	**2,220**

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APPENDIX A. COMMUNITY ENGAGEMENT

Government Code Section 65583(c)(7) requires that local governments "make a diligent effort to achieve public participation of all economic segments of the community in the development of the housing element." Compliant with this requirement and to engage its constituents in the planning process, the City of Millbrae (City or Millbrae) implemented a robust outreach strategy to hear from as many community members as possible. Below is a summary of engagement efforts. Please note that complete summaries of meetings, surveys, notices, and other documentation are provided in this Appendix A or through the links below.

Website and Social Media (City and County)

As a starting point for accomplishing extensive outreach, the City developed a clear online presence with all the information needed to understand the update process and how to participate in this process.

- Website/Webpage and Social Media
    - https://www.ci.millbrae.ca.us/departments-services/community-development/planning-division/housing-element
- Let's Talk Housing Website
    - To reach a broader audience and supplement the City's webpage, the Let's Talk Housing website with 21 Elements was launched in March 2021. The goal was to clearly explain what a housing element is, why it matters, and how to get involved. It was made available in Arabic, Chinese, English, Spanish, and Tagalog, designed to be responsive on all types of devices, and included accessibility features. As of January 2022, the website has been viewed more than 17,000 times, with more than 20% occurring from mobile devices. Let's Talk Housing Facebook, Instagram, Twitter, and YouTube accounts were also created and maintained to keep people informed about upcoming events.
- Informational Videos on the Housing Element Update
    - After completing a series of introductory Meetings to the Housing Element Update (see below), we supported 21 Elements in developing shorter 4-minute snippets to ensure information was more accessible and less onerous than watching an hour-long meeting. Two videos were produced–What is a Housing Element and How it Works and Countywide Trends and Why Housing Elements Matter–in Arabic, Chinese,

English, Spanish, and Tagalog. They were made available on the Let's Talk Housing YouTube channel and website and shared on social media.

Public Meetings and Hearings

The City held and participated in a variety of meetings to inform the public about the Housing Element and hear what matters to the community.

Introductory Meeting to the Housing Element Update (County)

The City helped develop and facilitate a 90-minute virtual countywide meeting about the Housing Element update. Held in March 2021, the meeting provided community members with an introduction to the Housing Element update, why it matters, information on the Let's Talk Housing outreach effort, and countywide trends. Breakout rooms were also provided for discussion with community members on housing needs, concerns, and opportunities, and answered any questions. A poll was given during the meeting, to identify who was joining us and more importantly who was missing from the conversation, including if they rent or own, whom they live with, their age, and ethnicity. Time for questions was allotted throughout, and meeting surveys were provided to all participants after the meeting along with all discussed resources and links.

In total six introductory meetings were held across the County between March and May 2021, and 1,024 registered for the series. Of those who registered, the majority identified as White (66%) or Asian (15%) and were 50 years or older; nearly half were 50 to 69 years old and almost a fifth were over 70. Almost half had lived over 21 years in their homes and three-fourths owned their homes. A meeting summary is provided in Appendix A.

All About RHNA Webinar (County)

A webinar with 21 Elements was held in April 2021 to provide information and answer community questions about the RHNA process. 264 people registered and 80 questions were answered over three hours. The recording of this meeting and the FAQ can be found here.

Community Workshop (City only)

The City hosted a virtual community workshop on June 30, 2022. The workshop was publicized on June 22, 27, and 30, 2022 via the City's Facebook, Twitter, and Nextdoor accounts. The workshop flyer was also posted on the City's website, on the City's Rec Center lobby screen, and throughout City Hall. A total of 15 people attended (10 community members and five city staff/consultants). The presentation involved live polling to receive additional input. Poll results indicated that affordability and location of housing (lack of housing near transit and jobs in the downtown area) were the primary issues of concern. The question during the workshop focused

on affordable housing, ways for the community to participate in the process, and what assurances are in place that housing will be implemented.

Stakeholder Listening Session Series (County)

The City joined 21 Elements for a facilitated series of listening sessions held between September and November 2021 to hear from various stakeholders who operate countywide or across multiple jurisdictions. The four sessions convened more than 30 groups including fair housing organizations, housing advocates, builders/developers (affordable and market-rate), and service providers, to provide observations on housing needs and input for policy consideration.

Summaries for each session can be found here. Key themes and stakeholder groups included:

Fair Housing: Concern for the end of the eviction moratorium, the importance of transit-oriented affordable housing and anti-displacement policies, and the need for education around accessibility regulations and tenant protections. 8 stakeholder groups provided this feedback, including 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: Concern for rent increases and the need for ongoing outreach to underserved and diverse communities, workforce housing, deeply affordable and dense infill, and tenant protections for the most vulnerable. 6 stakeholder groups provided this feedback, including 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: Local funding, tax credit availability, and concern that appropriate sites limit affordable housing while sites, construction costs, and city processes limit market-rate housing. 12 stakeholder groups provided this feedback, including 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: More affordable housing and vouchers or subsidies for market-rate housing are needed, along with on-site services and housing near transit, and jurisdictions should work with providers and people experiencing issues before creating programs. 10 stakeholder groups provided this feedback, including 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

Focused Stakeholder Meetings (City only)

The City made substantial efforts to engage local developers, service providers, and housing advocacy groups to determine needs, challenges, and opportunities related to housing in Millbrae. The City invited more than 50 groups to participate (as shown in the following table – all organizations listed were invited and those highlighted in yellow participated). The participants in the three meetings held for stakeholder groups are highlighted in yellow.

Invited	Participated
Affordable Housing Developers	
1301 Broadway Development	No
Sand Hill Property Company	No
Affirmed Housing	No
BRIDGE Housing	No
Eden Housing	No
Habitat for Humanity— Greater SF	Yes
HIP Housing	No
Housing Choices	Yes
Mercy Housing	No
MidPen Housing	No
The Core Companies	Yes
Architects	
Architecture International, Ltd. - 150 Serra	No
DB Architects - 130-140 El Camino Real	No
HOK - 150 Serra	No
Market Rate Developers	
130-140 El Camino Real	No
Anton Development	No
Greystar	Yes
Muzzi Developments	Yes
Republic Urban	No
Sand Hill Property Company	No
Sares | Regis	No
Summerhill Apartment Communities	Yes
Trammell Crow	Yes
Affordable Housing Service Providers	
Ayudando Lations A Soñar (ALAS)	No
Center for Independence of Individuals with Disabilities	Yes
Community Legal Services in East Palo Alto (CLSEPA)	No
El Comite de Vecinos del Lado Oeste (El Comite)	No
EPACANDO	No
Faith in Action	No
Greenbelt Alliance	No
HEART of San Mateo County	No
Home for All	No
Housing Authority of San Mateo County	No
Housing Equality Law Project	No
Housing Leadership Council	No
Legal Aid for San Mateo County	No
Lifemoves	No
Menlo Together	No
Nuestra Casa	No
One San Mateo	No
Peninsula for Everyone	No
Project Sentinel	Yes
Public Interest Law Project	No
Puente de la Costa Sur	No
Root Policy Research	No
San Mateo County Association of Realtors	No
San Mateo County Central Labor Council	No
San Mateo County Health	No
Self-Help for the Elderly San Mateo County	No
Youth Leadership Institute	No
Youth United for Community Action	No

The minutes from this meeting are included in Appendix A. Local housing needs and solutions were discussed and the themes and suggested programs are summarized below. Those suggestions that are within the City's control and are not current programs and policies are included below.

Affordable Housing Developers

- Consider reducing setbacks by 10 feet allowing more efficient use of a project site.
- Increasing density, decreasing parking requirements, and offering pre-development funding.
- Clarifying review periods for formal projects.
- Deferring the payment of fees to the time a certificate of occupancy is issued.
- Additional streamlining to push projects forward with any special consideration for affordable projects.

Housing Advocates/Service Providers

- Coordinate with County on voucher accessibility.
- Support Inclusionary housing fees through the City's current inclusionary housing requirement.
- Incentivize the development of extremely low-income housing (consider the ADU financing program).
- Waving park and in-lieu fees for affordable housing developers.
- Offer incentives and concessions to density bonuses and inclusionary housing.
- Work with faith-based organizations to facilitate the development of housing for developmentally disabled individuals.
- Develop housing near transit.
- Individuals with developmental disabilities along with those at extremely low incomes are often transit dependent. Access allows more independence and connectivity to the community, employment opportunities, services, etc.
- Lower parking requirements for affordable housing developments that are near transit areas.
- Encourage a mix of unit sizes (e.g., a 2-bedroom can accommodate a live in-aid or families).
- Accessibility Modifications for affordable housing for persons with disabilities.

Market Rate Developers

- Consider parking reductions and increasing density (up to 150 units/acre) to address shallow/smaller lot sizes.
- Development and other fees are high – consider reductions/deferrals.
- Residential projects on parking lots are good development opportunities.
- Mixed-use requirements on shallow parcels can be challenging.
- 100-150 units/acre is the ideal density.

Creating an Affordable Future Webinar Series

The City and 21 Elements offered a 4-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 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 for connection, 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, though some were focused on the need for new affordable housing. There was a lot of interest in seeing more housing built (affordable housing), concern about change or impact on schools, parking, and quality of life, and personal struggles with finding housing that is affordable and accessible shared. Some participants wanted more in-depth education and discussion of the next steps, while others had more basic questions they wanted to be answered.

In to be answered4 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. For more information, see the Summary here.

Other Outreach Activities

The City set out to collect as much feedback as possible from the community, from their general concerns and ideas to where new housing could go. It was also important to us to consider community outreach best practices and consult and partner with organizations working in the community, to ensure we were reaching as many people as possible and doing so thoughtfully.

Community Survey (City only)

The City provided a community survey between June 16, 2022, and August 3, 2022, with a total of 61 respondents (complete survey results are in Appendix A). The results of the survey indicate the following:

- Majority are satisfied with their housing choices.
- Affordability is the biggest housing issue.
- To address housing, the top two programs were rezoning to allow for higher density and conversion of commercial to residential and facilitate ADUs.
- To remove barriers to housing, streamline development and require that affordable units be part of more projects.
- Almost half of the respondents feel burdened by pollution and noise from the San Francisco Airport (the City is adjacent to the Airport).
- Existing Fair Housing services are not adequate (58%).

Equity Advisory Group

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. A stipend of $1,500 was originally provided for meeting four to five times over 12 months to advise on Housing Element outreach and help get the word out to the communities they work with.

After meeting twice in 2021, it was decided the best use of the EAG moving forward would be to provide more focused support in 2022 based on jurisdiction needs and organization expertise.

To date, 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 in different communities. The EAG continues to work collaboratively with jurisdictions and deepen partnerships, as well as connect community members to the Housing Element Update process. All participating organizations are featured on the Let's Talk Housing website and include 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 Mateo
- Youth United for Community Action www.youthunited.net

Affirmatively Furthering Fair Housing Survey (County)

A resident survey was conducted in 2021 of San Mateo County residents to support the AFFH analysis of Housing Elements. It explores residents' housing, affordability, and neighborhood challenges and experiences with displacement and housing discrimination. The survey also asks about residents' access to economic opportunity, captured through residents' reported challenges with transportation, employment, and K-12 education. The survey was offered in both English and Spanish.

The resident survey was available online, in both Spanish and English, in a format accessible to screen readers, and promoted through jurisdictional communications and social media, and partner networks. A total of 2,382 residents participated with 55 from Millbrae.

The survey instrument included questions about residents' current housing situation, housing, neighborhood and affordability challenges, healthy neighborhood indicators, access to opportunity, and experience with displacement and housing discrimination. The full survey results are provided in Appendix A with the issues identified in Millbrae listed below:

- Millbrae, Belmont, and Redwood City residents report being more reticent to request a repair to their unit in fear that their landlord will raise their rent or evict them.
- Residents in Daly City and Millbrae are more likely to report that they don't feel safe in their neighborhood or building.
- Daly City, Millbrae, San Mateo, and East Palo Alto residents were more likely to identify the lack of job opportunities available in their neighborhoods.
- Jurisdictions with the highest percentage of respondents who seriously looked for rental housing include Millbrae (74%), San Mateo (73%), and Redwood City (72%).
- Millbrae residents experience the greatest difficulty paying their property taxes among jurisdictions in San Mateo County.
- Millbrae, San Mateo, and Redwood City had the highest percentage of respondents who seriously looked for **ownership** housing. If denied, the reasons included:
- Real estate agent told me I would need to show I was prequalified with a bank (29%) and a bank would not give me a loan to buy a home (23%).
- Additionally, 21% of Millbrae respondents reported that the real estate agent would not make a disability accommodation when I asked.
- Residents in Redwood City, Millbrae, and South San Francisco, as well as large households, also reported that *a bank or other lender charged me a high-interest rate on my home loan* as a reason for denial.
- Millbrae, Brisbane, and Pacifica residents are also more likely than other respondents to have been displaced due to an unsafe housing situation (e.g., domestic assault, harassment).
- 45% and 42% of Millbrae respondents, respectively, answered that better lighting and reduced crime could improve a respondent's neighborhood situation.
- 29% of Millbrae respondents identified that having better teachers at their schools would improve the education situation in their respective households.

Having compiled all the feedback obtained from community outreach efforts, the City summarized it to find the issues that were most pressing to the Millbrae community and used that information to steer the goals, policies, and programs for the planning period. Chapter 8, Housing Plan, includes goals, policies, and programs that directly address feedback received

during the community engagement process. As previously mentioned, all of the activities and outreach materials are documented in this Appendix A, which includes the following:

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City Webpage

Webpage Contents

Housing Element Update

What is a Housing Element?

The Housing Element is a core element of the City's General Plan. The General Plan is a long-range plan that guides decision- making and establishes rules and standards for new development and city improvements. It reflects the community vision for the future and is intended to provide direction through the year 2040.

The key components of the Housing Element include:

- A community demographic profile and analysis of population growth and trends.
- A list of available land suitable for housing development.
- An evaluation of local constraints or barriers to housing development as well as opportunities to develop housing.
- Housing goals, programs, policies, and resources for improving and creating housing within the City.

What is the Process?

The City of Millbrae initiated work on the 2023-2031 Housing Element of the General Plan to address the existing and projected future housing needs of the City. Local governments are required by California State law to adequately plan for the housing needs of everyone in the community. To do so, local governments adopt housing elements that provide plans, programs, and regulatory systems to create opportunities for housing.

This update is for the 6th Cycle Housing Element which will cover the eight-year planning period from 2023-2031 for the City. The previous 5th Cycle Housing Element covers the planning period from 2015 - 2023.

Get involved and make your voice heard

We need to hear from you to help ensure that the updated Housing Element reflects the priorities of our community. There are several ways to make your voice heard:

- Share your opinions in the Housing Element survey, available here.
- The City held a virtual public workshop on Thursday, June 30, 2022. The workshop introduced the element, presented a community profile, include live polling on housing needs, challenges, and issues, and staff received input on potential policies and programs. The presentation slides can be viewed here.
- If you would like to sign up for updates, please email nguevara@ci.millbrae.ca.us to be added to our interest list.
- After the draft Housing Element is prepared, there will be opportunities to comment on the draft document and attend public hearings for adoption.

Housing Element FAQs

Why update the Housing Element?

California State law requires that local jurisdictions update the Housing Element every eight years. These frequent updates are required because housing is critical to ensure economic prosperity and quality of life in our region. This Housing Element update is an opportunity to evaluate the previous element and determine which parts have been effective and which should be improved. It also provides an opportunity for residents to get involved and help determine housing priorities, thereby helping to ensure that the City is responding to residents' changing needs.

The updated Housing Element must be adopted by the Millbrae City Council and submitted to the State Department of Housing and Community Development no later than January 31, 2023. If this deadline is missed, Millbrae could lose eligibility for significant sources of funding currently provided by the State and the Association of Bay Area Governments (ABAG), including critical infrastructure and transportation funds.

How is the Housing Element implemented?

The Housing Element sets goals, objectives, policies, and programs that direct decision-making around housing. When a new housing program, project, or idea is considered, the Housing Element provides guidance for decision makers to evaluate the proposal.

How much housing is needed?

Every eight years, each region in California receives a target number of homes to plan for from the State. This is called the Regional Housing Needs Allocation or RHNA. Millbrae is located in the region administered by ABAG. ABAG takes the number of housing units it receives from the State and divides it among the jurisdictions in its nine-county area, including Millbrae.

To comply with State law, the City's Housing Element must be updated to ensure the City's policies and programs can accommodate its share of the estimated housing growth identified by the State. For the current Housing Element update, the City's share of the RHNA is 2,199 units, split among different income levels (based on Area Median Income, or AMI) as shown in the table below. For more information about RHNA, please visit the ABAG website.

City of Millbrae Regional Housing Needs Assessment 2023-2031Assigned by ABAG

Income Group	Millbrae Units	San Mateo County Units	Bay Area Units	Millbrae %	San Mateo County %	Bay Area %
Very Low Income (<50% of AMI[1])	575	12,196	114,442	26.1%	25.6%	25.9%
Low Income (50%-80% of AMI)	331	7,023	65,892	15.1%	14.7%	14.9%
Moderate Income (80%-120% of AMI)	361	7,937	72,712	16.4%	16.6%	16.5%
Above Moderate Income (>120% of AMI)	932	20,531	188,130	42.4%	43.1%	42.6%
Total	2,199	47,687	441,176	100.0%	100.0%	100.0%

Is the City required to build housing?

State law does not require jurisdictions to build or finance new housing, but they must plan for it. Through the Housing Element update process, the City must show that it has the land use regulations and policies to accommodate its housing needs. The actual development of housing is primarily done by the private market.

The Housing Element is required to demonstrate potential sites where housing can be accommodated. Identification of a site's capacity does not guarantee that construction will occur on that site. If there are insufficient sites and capacity to meet the RHNA allocation, then the Housing Element is required to identify a rezoning program to create the required capacity. The City initiated work on identifying these potential sites for rezoning in the Downtown and El Camino Real Specific Plan.

It is important to note that if the City does not identify capacity for its RHNA targets, the City may be deemed out of compliance and risk losing important sources of funding currently provided by the State. It may also lose the right to deny certain projects and be limited in its local land use decision-making authority.

What is the schedule to complete the Update?

The updated Housing Element must be adopted by the Millbrae City Council and submitted to the State for certification no later than January 31, 2023. The City held Community Meetings to discuss the Housing Element on March 30, 2021, and May 6, 2021. These introductory meetings provided an overview of the Housing Element update process and time to talk to City of Millbrae staff to provide input about the local housing needs and related topics. Additionally, 21 Elements – a collaboration of all 21 San Mateo County jurisdictions – held a 4-part webinar series to help educate residents on regional and local housing issues. The City advertised this webinar series in its website and social media.

The City will hold an additional virtual workshop on June 30, 2022. Additional information and hearing notices will be posted to the Housing Element Update webpage and noticed via email.

Contact

Nestor Guevara

Associate Planner – Community Development

- Call (650) 259-2335
- Email nguevara@ci.millbrae.ca.us

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[1] *"AMI" means "Area Median Income" as defined by the California State Department of Housing and Community Development for San Mateo County.*

City Webpage

Housing Element 101 Fact Sheet

HOUSING ELEMENT 101

Fact Sheet

What is a Housing Element?

The Housing Element is how the City of Millbrae plans to meet the existing and future housing needs of its residents for all income levels. It includes goals, policies, programs, and strategies to accommodate the City's housing growth, provide opportunities for new housing, and preserve the existing housing stock. It is a core element of the City's General Plan and must be consistent with the other elements of the General Plan.

The key components of the Housing Element include:

- A community demographic profile and analysis of population growth and trends;
- A list of available land suitable for housing development;
- An evaluation of local constraints or barriers to housing development as well as opportunities to develop housing; and
- Housing goals, programs, policies, and resources for improving and creating housing within the City.

Why update the Housing Element?

California State law requires that local jurisdictions update the Housing Element every eight years. These frequent updates are required because housing is critical to ensure economic prosperity and quality of life in our region. This Housing Element update is an opportunity to evaluate the previous element and determine which parts have been effective and which should be improved. It also provides an opportunity for residents to get involved and help determine housing priorities, thereby helping to ensure that the City is responding to residents' changing needs.

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How is the Housing Element implemented?

The Housing Element sets goals, objectives, policies, and programs that direct decision-making around housing. When a new housing program, project, or idea is considered, the Housing Element provides guidance for decision makers to evaluate the proposal.

How Can I Get Involved?

Thank you for wanting to get involved and have your voice heard! To help shape the element as it is drafted, there will be multiple engagement activities for your participation. As the process progresses, you will be provided opportunities to comment on draft documents and attend public meetings. Due to the ongoing COVID-19 pandemic, these engagement activities will be mostly online and through Zoom meetings.

SIGN UP NOW!

Join the email list to be notified of involvement opportunities and updates to the Housing Element! Please email nguevara@ci.millbrae.ca.us to be added to our interest list.

TAKE THE SURVEY!

Share your thoughts on housing needs and opportunities in Millbrae! Visit this link to take the survey. https://www.surveymonkey.com/r/FDMWVZW

ATTEND WORKSHOPS!

The City will hold an additional virtual workshop on June 30, 2022. Additional information and hearing notices will be posted to the Housing Element Update webpage and noticed via email.

How much housing is needed?

Every eight years, each region in California receives a target number of homes to plan for from the State. This is called the Regional Housing Needs Allocation or RHNA. Millbrae is located in the region administered by ABAG. ABAG, with input from jurisdictions in its nine-county area, takes the number of housing units it receives from the State and divides it among those jurisdictions, including Millbrae.

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City of Millbrae
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[1] "AMI" means "Area Median Income" as defined by the California State Department of Housing and Community Development for San Mateo County.

For more information about RHNA, please visit the ABAG website at https://abag.ca.gov/our-work/housing/rhna-regional-housing-needs-allocation.

Is the City required to build housing?

State law does not require jurisdictions to build or finance new housing, but they must plan for it. Through the Housing Element update process, the City must show that it has the land use regulations and policies to accommodate its housing needs. The actual development of housing is primarily done by the private market.

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It is important to note that if the City does not identify capacity for its RHNA targets, the City may be deemed out of compliance and risk losing important sources of funding currently provided by the State. It may also lose the right to deny certain projects and be limited in its local land use decision-making authority.

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The City will hold an additional virtual workshop on June 30, 2022. Additional information and hearing notices will be posted to the Housing Element Update webpage and noticed via email.

Stay Up to Date on the Housing Element Update Process!

Visit www.ci.millbrae.ca.us/HEU for progress updates and engagement opportunities.

For more information, please contact Nestor Guevara at nguevara@ci.millbrae.ca.us or (650) 259-2335.

21 ELEMENTS ENGAGEMENT

- Resident Survey Analysis
- Countywide Meetings (March 30 & May 6, 2021) Summary
- Countywide Meetings (March 30 & May 6, 2021) Appendix
- Webinar Series (October – December 2021) Summary
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- Housing Advocates Meeting Summary (October 18, 2021)
- Builder Meeting Summary (November 1, 2021)
- Service Provider Meeting Summary (November 15, 2021)

21 Elements Engagement

Resident Survey Analysis

AFFH Appendix. Community Engagement

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

The resident survey was available online, in both Spanish and English, in a format accessible to screen readers, and promoted through jurisdictional communications and social media and through partner networks. A total of 2,382 residents participated.

The survey instrument included questions about residents' current housing situation, housing, neighborhood and affordability challenges, healthy neighborhood indicators, access to opportunity, and experience with displacement and housing discrimination.

Explanation of terms. Throughout this section, several terms are used that require explanation.

- "Precariously housed" includes residents who are currently homeless or living in transitional or temporary/emergency housing, as well as residents who live with friends or family but are not themselves on the lease or property title. These residents may (or may not) make financial contributions to pay housing costs or contribute to the household in exchange for housing (e.g., childcare, healthcare services).
- "Disability" indicates that the respondent or a member of the respondent's household has a disability of some type—physical, mental, intellectual, developmental.
- "Single parent" are respondents living with their children only or with their children and other adults but not a spouse/partner.
- "Tenure" in the housing industry means rentership or ownership.
- "Large households" are considered those with five or more persons residing in a respective household.
- "Seriously Looked for Housing" includes touring or searching for homes or apartments, putting in applications or pursuing mortgage financing.

Sampling note. The survey respondents do not represent a random sample of the county or jurisdictions' population. A true random sample is a sample in which each individual in the population has an equal chance of being selected for the survey. The self-selected nature of the survey prevents the collection of a true random sample. Important insights and themes can still be gained from the survey results, however, with an understanding of the differences among resident groups and between jurisdictions and the county overall. Overall, the data provide a rich source of information about the county's households and their experience with housing choice and access to opportunity in the communities where they live.

Jurisdiction-level data are reported for cities with 50 responses or more. Response by jurisdiction and demographics are shown in the figure below. Overall, the survey received a very strong response from typically underrepresented residents including: people of color, renters, precariously housed residents, very low income households, households with children, large households, single parents, and residents with disabilities.

Figure 1.
Resident Survey Sample Sizes by Jurisdictions and Selected Characteristics

	County	Belmont	Brisbane	Burlingame	Daly City	East Palo Alto	Foster City	Half Moon Bay	Hillsborough	Milbrae	Pacifica	Redwood City	San Bruno	San Mateo	South San Francisco
Total Responses	**2,382**	**89**	**82**	**173**	**130**	**53**	**148**	**63**	**59**	**55**	**84**	**163**	**99**	**175**	**832**
Race/Ethnicity															
African American	134	5	7	4	9	8	10	6	4	4	5	14	4	17	15
Hispanic	397	7	9	14	26	27	13	8	1	8	12	59	13	31	149
Asian	500	18	9	26	43	6	32	6	8	13	14	11	19	23	249
Other Race	149	7	10	6	8	3	14	3	3	3	3	9	7	13	47
Non-Hispanic White	757	41	35	89	27	4	44	27	27	15	35	54	36	58	195
Tenure															
Homeowner	1,088	39	51	96	39	9	89	26	46	18	42	37	48	58	409
Renter	1,029	40	30	65	67	36	43	28	7	33	38	105	41	88	324
Precariously Housed	309	10	8	12	26	12	17	14	5	7	13	23	16	29	87
Income															
Less than $25,000	282	14	11	12	21	15	12	11	5	6	7	40	11	29	61
$25,000-$49,999	265	13	9	10	22	9	8	6	3	6	7	28	5	20	97
$50,000-$99,999	517	10	14	38	43	10	26	11	3	10	17	37	22	40	206
Above $100,000	721	38	24	69	16	8	64	12	30	14	32	31	40	40	251
Household Characteristics															
Children under 18	840	38	24	53	50	26	44	17	18	20	29	61	37	64	287
Large households	284	5	7	11	20	18	8	3	5	7	8	20	13	15	133
Single Parent	240	14	8	15	19	11	12	9	3	7	7	30	9	21	49
Disability	711	28	25	41	38	22	40	22	13	17	29	62	34	65	210
Older Adults (age 65+)	736	25	27	66	37	11	54	25	25	18	33	44	32	37	248

Note: Numbers do not aggregate either due to multiple responses or that respondents chose not to provide a response to all demographic and socioeconomic questions.

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Primary Findings

The survey data present a unique picture of the housing choices, challenges, needs, and access to economic opportunity of San Mateo County residents.

Top level findings from residents' perspectives and experiences:

- The **limited supply of housing** that accommodates voucher holders presents several challenges. Specifically,
    - Eight out of 10 voucher holders represented by the survey find a landlord that accepts a housing voucher to be "difficult" or "very difficult."
    - According to the survey data, vouchers not being enough to cover the places residents want to live is a top impediment for residents who want to move in San Mateo County, as well as for African American, Asian, and Hispanic residents, households with children under 18, single parents, older adults, households with a member experiencing a disability, and several jurisdictions.
- **Low income is a barrier** to accessing housing. The impacts are highest for precariously housed respondents. large households, Hispanic households, and residents in Daly City and Redwood City.
- **Nearly 4 in 10 respondents who looked for housing experienced denial of housing.** African American/Black respondents, single parent households, precariously housed respondents, and households with income below $50,000 reported the highest denial rates.
- **1 in 5 residents have been displaced** from their home in the past five years. One of the main reasons cited for displacement was *the rent increased more than I could pay*. African American households, single parents, households that make less than $25,000, and precariously housed respondents reported the highest rates of displacement.
- For households with children that were displaced in the past five years, **60% of children in those households have changed schools.** The most common outcomes identified by households with children who have changed schools include *school is more challenging, they feel less safe at the new school,* and *they are in a worse school.*
- **Nearly 1 in 5 residents reported they have experienced discrimination** in the past five years. African American, single parent, and precariously housed respondents reported the highest rates of discrimination. The most common actions

in response to discrimination cited by survey respondents were *Nothing/I wasn't sure what to do* and *Moved/found another place to live*.

- Of respondents reporting a disability, **about 25% report that their current housing situation does not meet their accessibility needs**. The three top greatest housing needs identified by respondents included installation of grab bars in bathroom or bench in shower, supportive services to help maintain housing, and ramps.

- On average, respondents are **fairly satisfied with their transportation situation**. Groups with the highest proportion of respondents somewhat or not at all satisfied with their transportation options included African American, single parents, precariously housed, and Brisbane respondents.

There are some housing, affordability, and neighborhood challenges unique to specific resident groups. These include:

- **Would like to move but can't afford it**—Most likely to be a challenge for Daly City, East Palo Alto, and Redwood City respondents, as well as Hispanic, renter, precariously housed, households making less than $50,000, and large household respondents.

- **My house or apartment isn't big enough for my family**—Most likely to be a challenge for East Palo Alto respondents, as well as Hispanic households, large and single parent households, and households with children under 18.

- **I'm often late on my rent payments**—Most likely to be a challenge for East Palo Alto and renter respondents, as well as households that make less than $25,000.

- **I can't keep up with my utility payments**—Most likely to be a challenge for East Palo Alto, Daly City, and San Mateo respondents, as well as African American and Hispanic respondents, single parent households, households with children under 18, and households that make less than $50,000.

- **Bus/rail does not go where I need to go or does not operate during the times I need**— Most likely to be a challenge for African American, precariously housed, single parent households, Brisbane and Pacifica respondents.

- **Schools in my neighborhood are poor quality**—Most likely to be a challenge for East Palo Alto, Redwood City, San Bruno and South San Francisco respondents, as well as Hispanic respondents and households with children under 18.

Resident Survey Findings

Of survey respondents who reported their race or ethnicity, nearly 40% of survey respondents identified as non-Hispanic White, followed by Asian (26%), Hispanic (20%), African American (7%), and Other Minority (8%) residents (Figure 2). Overall, 45% of the survey respondents were homeowners, followed by 42% of renter respondents. Thirteen percent of respondents reported they are precariously housed (Figure 3). Four in ten respondents reported having household income greater than $100,000. Nearly 30% of respondents reported a household income between $50,000-99,999, followed by 15% of respondents who made between $25,000-49,999 and 16% of respondents making less than $25,000 (Figure 4).

The survey analysis also included selected demographic characteristics of respondents, including those with children under the age of 18 residing in their household, adults over the age of 65, respondents whose household includes a member experiencing a disability, those who live in large households, and single parents. Thirty five percent of respondents indicated they had children in their household, while 31% indicated they were older adults. Thirty percent of respondents indicated they or a member of their household experienced a disability, 12% of respondents reported having large households, and 10% were single parents (Figure 5).

Figure 2. Survey Respondents by Race/Ethnicity

Note:

n=1,937; 535 respondents did not indicate their race or ethnicity.

Source:

Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

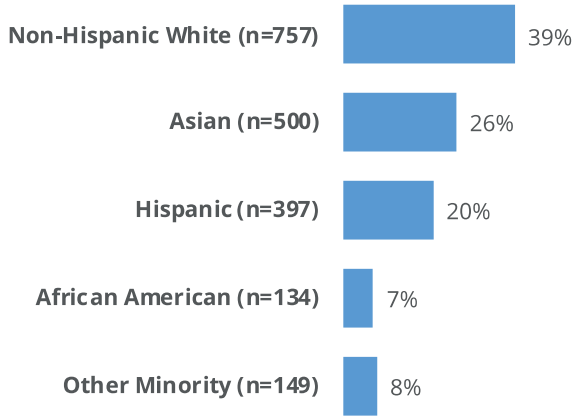


Figure 3. Survey Respondents by Tenure

Note:

n=2,426.

Source:

Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

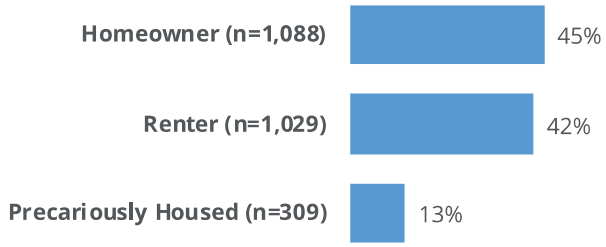


Figure 4. Survey Respondents by Income

Note:

n=1,785.

Source:

Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

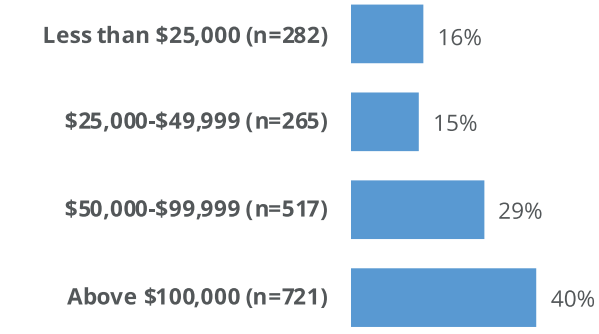
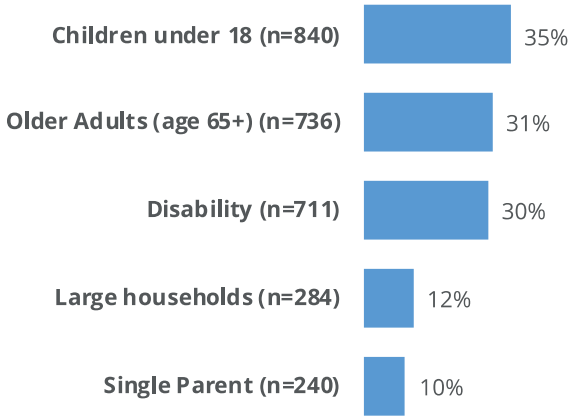


Figure 5. Survey Respondents by Selected Household Characteristics

Note:
Denominator is total responses to the survey (n=2,382)
Source:
Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.



Housing, Neighborhood and Affordability Challenges

Housing challenges: overall. Survey respondents were asked to select the housing challenges they currently experience from a list of 34 different housing, neighborhood, and affordability challenges. Figures 6a through 8c present the top 10 housing and neighborhood challenges and top 5 affordability challenges experienced by jurisdiction, race/ethnicity, tenure, income, and selected household characteristics.

These responses allow a way to compare the jurisdictions to the county for housing challenges for which other types of data do not exist. In this analysis, "above the county"—**shaded in light red or pink**—is defined as the proportion of responses that is 25% higher than the overall county proportion. "Below the county"—**shown in light blue**—occurs when the proportion of responses is 25% lower than the overall county proportion.

As shown in Figure 6a, residents in Redwood City and East Palo Alto experience several housing challenges at a higher rate than the county overall. Conversely, Foster City and Hillsborough residents experience nearly all identified housing challenges at a lower rate than the county.

Notable trends in housing, neighborhood, and affordability challenges by geographic area include:

- Residents in Daly City, East Palo Alto, and Redwood City are less likely to move due to the lack of available affordable housing options.
- East Palo Alto, Redwood City, and San Mateo residents report living in housing that is too small for their families.
- Millbrae, Belmont, and Redwood City residents report being more reticent to request a repair to their unit in fear that their landlord will raise their rent or evict them.
- Nearly 1 in 5 Pacifica survey respondents report that their home or apartment is in bad condition.

- Brisbane and East Palo Alto residents are more likely to experience a landlord refusing to make repairs to their unit.
- Residents in Daly City and Millbrae are more likely to report that they don't feel safe in their neighborhood or building.
- Half Moon Bay and East Palo Alto respondents expressed the greatest need for assistance in taking care of themselves or their home.

When compared to the county overall, **the most common areas where respondents' needs were higher than the county overall** were:

- Overall, half of the jurisdictions' respondents reported *I need help taking care of myself/my home and can't find or afford to hire someone* at a higher rate than the county.
- Over 40% of jurisdictions' respondents reported a higher rate than the county for the following housing challenge: *My home/apartment is in bad condition.*
- Nearly 40% of jurisdictions' respondents reported a higher rate than the county for the following housing challenges: *My landlord refuses to make repairs despite my requests* and *I don't feel safe in my neighborhood/building.*

Figure 6a.
Top 10 Housing Challenges Experienced by Jurisdiction

25% Above County average

25% Below County average

Housing or Neighborhood Condition	County	Belmont	Brisbane	Burlingame	Daly City	East Palo Alto	Foster City	Half Moon Bay	Hillsborough	Milbrae	Pacifica	Redwood City	San Bruno	San Mateo	South San Francisco
Valid cases	2,159	82	73	158	118	49	135	59	50	53	79	151	93	163	738
I would like to move but I can't afford anything that is available/income too low	31%	27%	12%	20%	51%	41%	16%	25%	4%	32%	28%	43%	30%	38%	35%
My house or apartment isn't big enough for my family	20%	22%	11%	14%	24%	35%	10%	12%	4%	21%	11%	26%	20%	26%	21%
I worry that if I request a repair it will result in a rent increase or eviction	14%	21%	10%	13%	17%	14%	9%	10%	2%	23%	15%	20%	11%	15%	13%
My home/apartment is in bad condition	11%	15%	14%	9%	15%	12%	3%	7%	0%	11%	18%	14%	5%	15%	10%
My landlord refuses to make repairs despite my requests	6%	6%	14%	3%	5%	12%	4%	5%	2%	2%	9%	9%	5%	10%	5%
I live too far from family/ friends/my community	6%	6%	5%	4%	8%	4%	5%	8%	6%	6%	3%	8%	4%	7%	5%
I don't feel safe in my building/ neighborhood	6%	7%	5%	5%	13%	8%	0%	7%	6%	11%	10%	8%	3%	6%	3%
I need help taking care of myself/my home and can't find or afford to hire someone	5%	2%	7%	7%	7%	10%	2%	14%	2%	8%	9%	3%	4%	8%	4%
I have bed bugs/insects or rodent infestation	5%	10%	5%	4%	3%	16%	2%	3%	4%	6%	9%	11%	6%	4%	3%
The HOA in my neighborhood won't let me make changes to my house or property	4%	2%	5%	1%	3%	8%	11%	3%	2%	4%	5%	3%	3%	4%	2%
None of the above	42%	37%	48%	50%	20%	33%	55%	44%	76%	36%	47%	28%	45%	35%	46%

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

The following two figures segment the answers by:

- Housing affordability challenges only; and
- Neighborhood challenges only.

Housing affordability challenges. As shown in Figure 6b, residents in San Mateo, Daly City, East Palo Alto, and Pacifica experience affordability challenges at a higher rate than the county overall. Conversely, Belmont, Hillsborough, Burlingame, and South San Francisco residents experience affordability challenges at a lower rate than the county.

The most significant geographic variations occur in:

- San Mateo city residents experience all five affordability challenges at a greater rate than the county overall. In addition to being less likely to pay utility bills or rent on time, San Mateo residents are more than twice as likely than the average county respondent to have bad credit or a history of eviction/foreclosure that impacts their ability to rent.
- East Palo Alto, San Mateo, and Daly City residents are most likely to experience difficulty paying utility bills.
- Residents in East Palo Alto and Redwood City are most likely to be late on their rent payments.
- Millbrae residents experience the greatest difficultly paying their property taxes among jurisdictions in San Mateo County.
- Respondents from Brisbane, Half Moon Bay, and Pacifica are also more likely to have trouble keeping up with property taxes.
- Daly City, City of San Mateo, and Redwood City respondents are more likely to have bad credit or an eviction history impacting their ability to rent.

Overall, over a third of jurisdictions' respondents experienced the following affordability challenges at a higher rate than the county: *I can't keep up with my property taxes* and *I have bad credit/history of evictions/foreclosure and cannot find a place to rent*.

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Figure 6b.
Top 5 Affordability Challenges Experienced by Jurisdiction

25% Above County average

25% Below County average

Affordability Challenges	County	Belmont	Brisbane	Burlingame	Daly City	East Palo Alto	Foster City	Half Moon Bay	Hillsborough	Milbrae	Pacifica	Redwood City	San Bruno	San Mateo	South San Francisco
Valid cases	2,130	83	73	157	115	51	134	58	50	50	77	147	93	160	728
I can't keep up with my utilities	10%	6%	5%	6%	15%	16%	5%	12%	4%	12%	8%	12%	9%	15%	9%
I'm often late on my rent payments	8%	6%	5%	6%	10%	20%	3%	7%	2%	8%	4%	12%	4%	11%	7%
I can't keep up with my property taxes	6%	2%	10%	4%	3%	2%	8%	10%	0%	16%	10%	3%	5%	9%	5%
I have bad credit/history of evictions/foreclosure and cannot find a place to rent	4%	1%	4%	2%	13%	6%	0%	0%	2%	0%	5%	8%	4%	10%	2%
I have Section 8 and I am worried my landlord will raise my rent higher than my voucher payment	4%	2%	7%	3%	3%	2%	7%	3%	4%	4%	5%	3%	3%	6%	2%
None of the above	73%	73%	68%	80%	65%	59%	78%	66%	88%	64%	71%	70%	77%	63%	80%

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Neighborhood challenges. As shown in Figure 6c, residents in East Palo Alto, Brisbane, Daly City, and Pacifica experience neighborhood challenges at a higher rate than the county. Burlingame and Foster City both experience neighborhood challenges at a lower rate than the county.

Hillsborough and Belmont residents report divergent experiences related to neighborhood challenges — respondents identified more challenges around neighborhood infrastructure and access to transit but fewer challenges around school quality and job opportunities.

There are a handful of jurisdictions who experience specific neighborhood challenges at a disproportionate rate compared to the county.

- For instance, East Palo Alto and Belmont residents experience neighborhood infrastructure issues (e.g., bad sidewalks, no lighting) more acutely than county residents overall.
- Brisbane residents experience transportation challenges in their neighborhoods.
- East Palo Alto, Redwood City, San Bruno, and South San Francisco experience challenges with school quality in their neighborhoods.
- Residents in Brisbane, Hillsborough, Pacifica, Belmont, and Half Moon Bay report the highest rates of difficulty accessing public transit.
- Daly City, Millbrae, San Mateo, and East Palo Alto residents were more likely to identify the lack of job opportunities available in their neighborhoods.

Over a third of jurisdictions' respondents experienced the following neighborhood challenges at a higher rate than the county: *I can't get to public transit/bus/light rail easily or safely.*

Figure 6c.
Top 5 Neighborhood Challenges Experienced by Jurisdiction

25% Above County average

25% Below County average

Neighborhood Challenges	County	Belmont	Brisbane	Burlingame	Daly City	East Palo Alto	Foster City	Half Moon Bay	Hillsborough	Milbrae	Pacifica	Redwood City	San Bruno	San Mateo	South San Francisco
Valid cases	2,079	80	72	153	116	48	130	56	53	46	75	145	91	151	712
My neighborhood does not have good sidewalks, walking areas, and/or lighting	17%	31%	18%	13%	25%	40%	4%	18%	23%	20%	15%	21%	14%	12%	16%
Schools in my neighborhood are poor quality	15%	6%	18%	3%	17%	25%	4%	14%	2%	7%	13%	20%	20%	15%	20%
Bus/rail does not go where I need to go or does not operate during the times I need	15%	14%	24%	8%	14%	15%	21%	18%	9%	15%	24%	17%	14%	17%	10%
I can't get to public transit/bus/light rail easily or safely	14%	19%	29%	7%	9%	10%	14%	18%	25%	17%	21%	12%	13%	15%	10%
There are not enough job opportunities in the area	12%	9%	8%	7%	20%	17%	8%	14%	0%	20%	13%	11%	11%	18%	12%
None of the above	50%	41%	28%	69%	45%	33%	62%	46%	57%	50%	52%	41%	52%	52%	55%

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Differences in needs by race and ethnicity and housing tenure. As shown in Figure 7a, and compared to the county overall:

- African American, Hispanic, and Other Race respondents, as well as Renters and those who are precariously housed experience several housing challenges at a higher rate than the county overall.
- Conversely, non-Hispanic White residents and homeowners are less likely to experience housing challenges.

Specifically,

- Black or African American residents are more than three times as likely to have a landlord not make a repair to their unit after a request compared to county residents overall. Renters, Hispanic, Other Race, and Precariously housed residents are also more likely to experience this challenge.
- African American, Asian, Hispanic, Renter, and Precariously Housed households are more likely to experience bed bugs or rodent infestation in their homes.
- African American, Other Race, Renter, and Precariously Housed households are also more likely to live further away from family, friends, and their community.
- African Americans are three times more likely than the average county respondent to be told by their HOA they cannot make changes to their house or property. Asian households are twice as likely to experience this challenge.
- Renter, Hispanic, and Other Race respondents are more likely to worry that if they request a repair it will result in a rent increase or eviction and to report that their homes are in bad condition.

Figure 7a.
Top 10 Housing Challenges Experienced by Race/Ethnicity and Tenure

25% Above County average

25% Below County average

Housing or Neighborhood Condition	County	African American	Asian	Hispanic	Other Race	Non-Hispanic White	Homeowner	Renter	Precariously Housed
Valid cases	2,159	132	489	392	144	734	986	974	301
I would like to move but I can't afford anything that is available/income too low	31%	30%	32%	50%	31%	20%	7%	48%	56%
My house or apartment isn't big enough for my family	20%	16%	21%	35%	22%	11%	12%	29%	18%
I worry that if I request a repair it will result in a rent increase or eviction	14%	17%	13%	23%	19%	11%	2%	28%	13%
My home/apartment is in bad condition	11%	12%	9%	16%	17%	10%	6%	17%	10%
My landlord refuses to make repairs despite my requests	6%	20%	7%	10%	10%	5%	2%	13%	10%
I live too far from family/ friends/my community	6%	15%	6%	6%	13%	6%	5%	8%	9%
I don't feel safe in my building/ neighborhood	6%	13%	6%	6%	9%	5%	4%	8%	7%
I need help taking care of myself/my home and can't find or afford to hire someone	5%	14%	7%	5%	6%	5%	5%	6%	11%
I have bed bugs/insects or rodent infestation	5%	14%	8%	7%	5%	4%	4%	9%	9%
The HOA in my neighborhood won't let me make changes to my house or property	4%	14%	8%	4%	3%	3%	5%	3%	7%
None of the above	42%	18%	37%	24%	38%	58%	68%	21%	13%

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

The above trends are similar for the **most acute housing affordability challenges**. As shown in Figure 7b, African American and Hispanic households, as well as renters and those precariously housed, experience affordability challenges at a higher rate than the county overall. Non-Hispanic White residents and homeowners experience these same challenges at a lower rate than the county.

- African American residents experience all five affordability challenges at a greater rate than the county overall.
- In addition to being more likely to not pay utility bills or rent on time, African American residents are more than four times as likely than the average county respondent to have a Section 8 voucher and worry that their landlord will raise their rent more than the voucher payment.
- Along with African American residents, Hispanic households, renters, and precariously housed households are most likely to experience difficulty paying utility bills, as well as have bad credit or eviction/foreclosure history impacting their ability to find a place to rent.
- These groups, with the exception of those precariously housed, are also more likely to be late on their rent payments.

Figure 7b.
Top 5 Affordability Challenges Experienced by Race/Ethnicity and Tenure

25% Above County average

25% Below County average

Affordability Challenges	County	African American	Asian	Hispanic	Other Race	Non-Hispanic White	Homeowner	Renter	Precariously Housed
Valid cases	2,130	132	487	391	146	739	983	953	293
I can't keep up with my utilities	10%	22%	11%	17%	14%	5%	5%	15%	15%
I'm often late on my rent payments	8%	13%	6%	12%	12%	4%	1%	15%	8%
I can't keep up with my property taxes	6%	16%	8%	4%	5%	7%	9%	5%	14%
I have bad credit/history of evictions/foreclosure and cannot find a place to rent	4%	5%	3%	8%	4%	2%	1%	6%	11%
I have Section 8 and I am worried my landlord will raise my rent higher than my voucher payment	4%	18%	5%	6%	7%	2%	2%	7%	8%
None of the above	73%	32%	70%	63%	64%	83%	84%	61%	54%

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

As shown in Figure 7c, African American and precariously housed residents experience neighborhood challenges at a higher rate than the county. These two groups experience neighborhood issues related to transportation more acutely than county residents overall. In addition to Other Race respondents, they are also more likely to identify the lack of job opportunities in their respective neighborhoods.

Additionally, Hispanic residents are more likely to live in neighborhoods with poor performing schools than the average county respondent. Homeowners are also more likely to report that they cannot access public transit easily or safely.

Figure 7c.
Top 5 Neighborhood Challenges Experienced by Race/Ethnicity and Tenure

25% Above County average

25% Below County average

Neighborhood Challenges	County	African American	Asian	Hispanic	Other Race	Non-Hispanic White	Homeowner	Renter	Precariously Housed
Valid cases	2,079	133	486	389	146	737	975	918	284
My neighborhood does not have good sidewalks, walking areas, and/or lighting	17%	14%	17%	19%	16%	18%	18%	15%	18%
Schools in my neighborhood are poor quality	15%	13%	18%	20%	17%	13%	18%	13%	13%
Bus/rail does not go where I need to go or does not operate during the times I need	15%	33%	16%	13%	17%	17%	17%	14%	24%
I can't get to public transit/bus/light rail easily or safely	14%	24%	15%	11%	16%	16%	18%	11%	19%
There are not enough job opportunities in the area	12%	22%	14%	12%	19%	9%	9%	15%	20%
None of the above	50%	23%	46%	48%	45%	53%	49%	51%	36%

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Differences in needs by household status. As shown in Figure 8a, single parents, households making less than $50,000, households with children under 18 and households with a member experiencing a disability are more likely to experience housing challenges. Conversely, households making more than $100,000 experience nearly all specified housing challenges at a lower rate than the county.

Single parents experience all ten housing challenges at a greater rate than the county overall.

Households making less than $25,000 also experience every challenge at a higher rate, with the exception of *I worry that if I request a repair it will result in a rent increase or eviction.*

Households making less than $50,000, single parents, and households with children under 18 are more likely to experience the following challenges:

- My house or apartment isn't big enough for my family;
- My house or apartment is in bad condition;
- My landlord refuses to make repairs despite my request;
- I live too far from family/friends/my community;
- I don't feel safe in my building/neighborhood;
- I need help taking care of myself/my home and can't find or afford to hire someone; and
- I have bed bugs/insects or rodent infestation.

Households with a member experiencing a disability are also more likely to experience landlords refusing their requests to make repairs, living further away from family/friends/community, and not being able to find or afford someone to help take care of themselves or their homes. These households are also more likely to experience bed bugs, insects, or rodent infestation, as well as HOA restrictions impacting their ability to make changes to their home or property.

Additionally, large households have the highest proportion of respondents among the selected groups that would like to move but can't afford anything that is available.

Figure 8a.
Top 10 Housing Challenges Experienced by Income and Household Characteristics

25% Above County average

25% Below County average

Housing or Neighborhood Condition	County	Less than $25,000	$25,000-$49,999	$50,000-$99,999	Above $100,000	Children under 18	Large Households	Single Parent	Disability	Adults (age 65+)
Valid cases	2,159	280	260	505	701	827	278	240	701	709
I would like to move but I can't afford anything that is available/income too low	31%	47%	48%	37%	16%	35%	51%	40%	36%	25%
My house or apartment isn't big enough for my family	20%	25%	25%	23%	16%	34%	43%	32%	20%	13%
I worry that if I request a repair it will result in a rent increase or eviction	14%	16%	18%	19%	9%	19%	19%	28%	16%	11%
My home/apartment is in bad condition	11%	15%	20%	12%	6%	15%	17%	17%	12%	9%
My landlord refuses to make repairs despite my requests	6%	13%	13%	8%	2%	9%	8%	14%	10%	6%
I live too far from family/ friends/my community	6%	9%	9%	6%	5%	10%	5%	10%	8%	6%
I don't feel safe in my building/ neighborhood	6%	9%	9%	6%	3%	8%	4%	10%	7%	5%
I need help taking care of myself/my home and can't find or afford to hire someone	5%	9%	9%	5%	3%	7%	6%	12%	11%	6%
I have bed bugs/insects or rodent infestation	5%	10%	9%	5%	3%	9%	4%	15%	9%	6%
The HOA in my neighborhood won't let me make changes to my house or property	4%	7%	3%	4%	3%	7%	4%	11%	6%	5%
None of the above	42%	21%	21%	37%	61%	28%	26%	12%	32%	49%

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

As shown in Figure 8b, households making less than $50,000, as well as large households, single parents, households with children under 18, and households with a member experience a disability, experience the most acute affordability challenges at a higher rate than the county overall. Households making more than $50,000 and adults over the age of 65 are less likely to experience affordability challenges.

Households making between $25,000-$50,000, single parents, and households with children under 18 experience all five affordability challenges at a greater rate than the average county respondent.

Of households experiencing major affordability issues, **single parent households are most acutely impacted.** These households are more than three times as likely to have a Section 8 voucher and fear their landlord will raise the rent impacting the viability of their voucher, more than twice as likely to miss utility payments and have bad credit/eviction or foreclosure history impacting their ability to rent, and twice as likely to have trouble keeping up with their property taxes.

Figure 8b.
Top 5 Affordability Challenges Experienced by Income and Household Characteristics

25% Above County average

25% Below County average

Affordability Challenges	County	Less than $25,000	$25,000-$49,999	$50,000-$99,999	Above $100,000	Children under 18	Large Households	Single Parent	Disability	Adults (age 65+)
Valid cases	2,130	276	260	509	703	830	279	239	699	716
I can't keep up with my utilities	10%	16%	16%	12%	3%	16%	14%	23%	15%	8%
I'm often late on my rent payments	8%	19%	16%	6%	1%	11%	12%	15%	11%	4%
I can't keep up with my property taxes	6%	7%	9%	8%	5%	9%	4%	12%	8%	7%
I have bad credit/history of evictions/foreclosure and cannot find a place to rent	4%	8%	7%	4%	1%	5%	6%	10%	6%	3%
I have Section 8 and I am worried my landlord will raise my rent higher than my voucher payment	4%	11%	6%	4%	1%	7%	3%	14%	8%	5%
None of the above	73%	46%	56%	72%	90%	59%	70%	32%	59%	75%

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

As shown in Figure 8c, households with children under 18, as well as single parents, households with a member experiencing a disability, and households making less than $25,000 are more likely to experience neighborhood challenges. These households are most likely to report that *the bus/rail does not go where I need to go or does not operate during the times I need.* In addition to households that make between $25,000-$100,000, these groups are more likely to identify the lack of job opportunities in their respective neighborhoods.

Households with children under 18 are more likely to live in neighborhoods with poor quality schools. Large households are more likely to report issues with neighborhood infrastructure (e.g., bad sidewalks, poor lighting) and households with a member experiencing a disability are more likely to report they cannot access public transit easily or safely.

Figure 8c.
Top 5 Neighborhood Challenges Experienced by Income and Household Characteristics

25% Above County average

25% Below County average

Neighborhood Challenges	County	Less than $25,000	$25,000-$49,999	$50,000-$99,999	Above $100,000	Children under 18	Large Households	Single Parent	Disability	Adults (age 65+)
Valid cases	2,079	273	259	503	709	824	277	234	692	714
My neighborhood does not have good sidewalks, walking areas, and/or lighting	17%	17%	15%	18%	17%	19%	22%	16%	19%	14%
Schools in my neighborhood are poor quality	15%	17%	14%	11%	19%	24%	19%	17%	14%	9%
Bus/rail does not go where I need to go or does not operate during the times I need	15%	19%	16%	15%	16%	19%	11%	28%	19%	16%
I can't get to public transit/bus/light rail easily or safely	14%	15%	12%	14%	14%	15%	12%	15%	19%	17%
There are not enough job opportunities in the area	12%	21%	17%	16%	6%	17%	12%	19%	15%	11%
None of the above	50%	40%	45%	51%	53%	38%	48%	31%	41%	53%

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Experience Finding Housing

This section explores residents' experience seeking a place to rent or buy in the county and the extent to which displacement—having to move when they do not want to move—is prevalent. For those respondents who seriously looked for housing in the past five years, this section also examines the extent to which respondents were denied housing to rent or buy and the reasons why they were denied.

Recent experience seeking housing to rent. Figure 9 presents the proportion of respondents who seriously looked to rent housing for the county, jurisdictions, and selected respondent characteristics, as well as the reasons for denial.

Over half of county respondents (56%) have seriously looked for housing in the past five years. The **most common reasons for denial** included:

- Landlord not returning the respondent's call (26%),
- Landlord told me the unit was available over the phone but when I showed up in person, it was no longer available (22%), and
- Landlord told me it would cost more because of my service or emotional support animal (14%).

Jurisdictions with the highest percentage of respondents who seriously looked for housing include Millbrae (74%), San Mateo (73%), and Redwood City (72%). While all three jurisdictions reported that *landlord not returning the respondent's call* was one of their main reasons for denial, 18% of Redwood City respondents identified *landlord told me they do not accept Section 8 vouchers* as a main reason for denial.

Among respondents by race/ethnicity, 80% of African American respondents reported that they had seriously looked for housing in the past five years while the lowest percentage of respondents who reported seriously looking for housing were non-Hispanic White (46%). The main reasons for denial experienced by African American respondents included *landlord told me the unit was available over the phone but when I showed up in person, it was no longer available* (39%), *landlord told me it would cost more because of my service or emotional support animal* (34%), and *landlord told me I couldn't have a service or emotional support animal* (28%).

Among respondents by tenure, renters (75%) and precariously housed (74%) respondents reported the highest rates of seriously looking for housing.

Among respondents by income, households making less than $25,000 (71%) had the highest rate. The main reasons for denial reported by these households were *landlord told me I couldn't have a service or emotional support animal* (36%) and *landlord told me it would cost more because of my service or emotional support animal* (30%).

Single parents (79%) and households with children under 18 (66%) also reported the highest percentage of those who seriously looked for housing in the past five years among the selected household characteristics respondent groups. In addition to sharing the top two reasons for denial with the county, 25% of single parent household respondents also reported they were denied housing because the *landlord told me I can't have a service or emotional support animal.*

Figure 9. If you looked seriously for housing to rent in San Mateo County in the past five years, were you ever denied housing?

		Reason for Denial									
	Overall Percent Seriously Looked for Housing	Landlord did not return calls and/or emails asking about a unit	Landlord said unit was available over phone, but when I showed up in person, it was no longer available	Landlord told me it would cost me more for my service or emotional animal	Landlord told me I can't have a service or emotional support animal	Landlord told me it would cost me more to rent because I have children	Landlord told me they don't rent to families with children	Landlord told me they do not accept Section 8 vouchers	Landlord told me they couldn't make changes to the apartment/ home for my disability	None of the Above	n
Jurisdiction											
County	**56%**	26%	22%	14%						45%	928
Belmont	**62%**	33%	27%							31%	49
Brisbane	**59%**		41%			22%				26%	27
Burlingame	**48%**	19%	23%							54%	57
Daly City	**63%**	33%	16%			16%				44%	61
East Palo Alto	**58%**	35%	30%							26%	23
Foster City	**50%**	12%		16%	14%					55%	51
Half Moon Bay	**68%**					17%	17%			48%	29
Hillsborough	**42%**		14%	29%	14%					57%	14
Milbrae	**74%**	25%	46%							36%	28
Pacifica	**51%**	16%	26%						16%	55%	31
Redwood City	**72%**	31%						18%		40%	99
San Bruno	**57%**			22%		22%				39%	36
San Mateo	**73%**	30%	34%							39%	98
South San Francisco	**47%**	24%	13%							56%	248
Race/Ethnicity											
African American	**80%**		39%	34%	28%					15%	101
Asian	**56%**	19%	29%							40%	199
Hispanic	**63%**	32%	22%							41%	230
Other Race	**70%**	29%	22%							45%	91
Non-Hispanic White	**46%**	29%	20%							48%	263
Tenure											
Homeowner	**36%**		25%						15%	54%	183
Renter	**75%**	29%	22%							43%	641
Precariously Housed	**74%**	23%	32%							26%	188
Income											
Less than $25,000	**71%**			30%	36%					29%	182
$25,000-$49,999	**60%**	39%	32%							27%	149
$50,000-$99,999	**58%**	24%		20%						45%	251
Above $100,000	**48%**	19%	14%							64%	216
Household Characteristics											
Children under 18	**66%**	30%	29%							33%	447
Large Households	**60%**	33%	19%			18%				44%	139
Single Parent	**79%**	25%	35%		25%					19%	173
Disability	**63%**	24%	24%							34%	386
Older Adults (age 65+)	**48%**	20%	29%							39%	282

Note: The "Percent Seriously Looked for Housing" column includes all respondents, not just those who indicated they rent.

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Recent experience seeking housing to buy. Figure 10 presents the proportion of respondents who seriously looked to buy housing in the county, by jurisdiction, and selected respondent characteristics, as well as the reasons for denial. As noted above, 56% of county respondents have seriously looked for housing in the past five years.

The most common reasons for denial included:

- Real estate agent told me I would need to show I was prequalified with a bank (29%) and
- A bank would not give me a loan to buy a home (23%).

For the jurisdictions with the highest percentage of respondents who seriously looked for housing (Millbrae, San Mateo and Redwood City), all three cities shared the same top two reasons for denial as the county. Additionally, 21% of Millbrae respondents reported that *the real estate agent would not make a disability accommodation when I asked*.

For African American respondents who looked to buy housing in the last five years, the most common reason for denial was *the real estate agent would not make a disability accommodation when I asked* (47%). African Americans, along with Other Races, also most commonly reported that they needed a loan prequalification before real estate agents would work with them. While between 43-54% of respondents from other racial/ethnic groups reported they did not experience any reason for denial when seriously looking to buy housing over the past five years, 12% of African American respondents reported similarly.

Among respondents by income, the main reasons for denial for households making less than $25,000 were *the real estate agent told me I would need to show I was prequalified with a bank* (32%) and *real estate agent only showed me or only suggested homes in neighborhoods where most people were of my same race or ethnicity* (26%).

Among the selected housing characteristics category, single parent households and households with children under 18 reported shared the same top two reasons for denial as the county. Additionally, 36% of single parent household respondents reported that *the real estate agent would not make a disability accommodation when I asked*, as well as 25% of respondents over the age of 65.

Residents in Redwood City, Millbrae, and South San Francisco, as well as large households, also reported that *a bank or other lender charged me a high interest rate on my home loan* as a reason for denial.

Figure 10. If you looked seriously for housing to buy in San Mateo County in the past five years, were you ever denied housing?

	Percent Seriously Looked for Housing	Reason for Denial						n
		The real estate agent told me I would need to show I was prequalified with a bank	A bank or other lender would not give me a loan to buy a home	The real estate agent would not make a disability accommodation when I asked	Only showed homes in neighborhoods where most people were same race/ethnicity	A bank or other lender charged me a high interest rate on my home loan	None of the Above	
Jurisdiction								
County	**56%**	29%	23%				50%	870
Belmont	**62%**	21%			15%		35%	48
Brisbane	**59%**	36%			30%		42%	33
Burlingame	**48%**	22%	14%				61%	51
Daly City	**63%**	19%	27%				56%	52
East Palo Alto	**58%**	24%	33%				48%	21
Foster City	**50%**	25%	20%				49%	51
Half Moon Bay	**68%**	35%	23%	23%			50%	26
Hillsborough	**42%**	18%		23%			59%	22
Milbrae	**74%**	25%	29%	21%		21%	54%	28
Pacifica	**51%**	35%	35%				42%	31
Redwood City	**72%**	30%	22%			27%	50%	64
San Bruno	**57%**	14%	21%				62%	42
San Mateo	**73%**	40%	32%				38%	82
South San Francisco	**47%**	26%	18%			16%	57%	251
Race/Ethnicity								
African American	**80%**	40%	38%	47%			12%	89
Asian	**56%**	30%	25%				43%	223
Hispanic	**63%**	29%	28%				49%	174
Other Race	**70%**	36%	21%			21%	50%	90
Non-Hispanic White	**46%**	29%	23%				54%	250
Tenure								
Homeowner	**36%**	29%	17%				54%	332
Renter	**75%**	32%	27%				46%	467
Precariously Housed	**74%**	36%	36%	30%			30%	154
Income								
Less than $25,000	**71%**	32%	25%		26%		41%	131
$25,000-$49,999	**60%**	42%	40%				29%	106
$50,000-$99,999	**58%**	35%	30%				38%	216
Above $100,000	**48%**	22%	13%			10%	64%	296
Household Characteristics								
Children under 18	**66%**	33%	28%				40%	443
Large Households	**60%**	33%	25%			25%	49%	126
Single Parent	**79%**	38%	43%	36%			24%	143
Disability	**63%**	35%	26%				38%	330
Older Adults (age 65+)	**48%**	35%	29%	25%			38%	252

Note: The "Percent Seriously Looked for Housing" column includes all respondents, not just those who indicated they buy.

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Denied housing to rent or buy. Figure 11 presents the proportion of those who looked and were denied housing to rent or buy for the county, jurisdictions, and selected respondent characteristics, as well as reason for denial. As shown, nearly 4 in 10 county respondents who looked for housing experienced denial of housing. African American/Black respondents, precariously housed respondents, households with income below $50,000, and single parent respondents have denial rates of 60% or higher. African American (79%) and single parent (74%) respondents report the highest rates of denial.

Among the reasons for denial:

- ***Income too low*** **was a major reason for denial for all groups** except homeowners and households with incomes above $100,000. Additionally, all jurisdictions report this as a common reason for being denied housing with the exception of Foster City, Hillsborough, and San Bruno.

- *Haven't established a credit history or no credit history* was also a common reason of denial for most groups. The impacts are higher for Asian, Hispanic and African American households, along with renter and precariously housed respondents, households with income below $50,000, and single parent households, households with children under 18, households with a member experiencing a disability, and several jurisdictions.

- Another top denial reason among certain groups is the *landlord didn't accept the type of income I earn (social security or disability benefit or child support)*. **Source of income was the most common reason for denial among African American households** (28%). Other groups with denial rates of 25% or higher for this specific issue include precariously housed respondents, single parent households, and households with a member experiencing a disability, as well as Foster City and San Bruno residents.

- *Bad credit* is another barrier for accessing housing, particularly for Hispanic and Other Race households, households with income between $50,000-$100,000, and large households. This also impacts East Palo Alto, San Mateo, Daly City, Redwood City, Burlingame, and South San Francisco residents at a higher rate.

Figure 11. If you looked seriously for housing to rent or buy in San Mateo County in the past five years, were you ever denied housing?

			Reason for Denial												
	Percent Denied Housing	Total n	Bad Credit	Eviction history	Income too low	Too many people in my household	Other renter/ applicant willing to pay more for rent	Haven't established a credit history/no credit history	Don't have a regular/ steady job/ consistent work history	Landlord didn't accept the type of income I earn (social security or disability)	Lack of stable housing record	Real or perceived sexual orientation or gender identity	I had/ have COVID	Foreclosure	n
Jurisdiction															
County	**39%**	1154	18%		44%		19%	21%							449
Belmont	**52%**	50			38%		27%	27%							26
Brisbane	**42%**	38			25%			19%				31%			16
Burlingame	**30%**	71	24%		29%										21
Daly City	**49%**	73	28%		53%		28%		19%						36
East Palo Alto	**55%**	29	38%		44%			25%							16
Foster City	**30%**	63							25%	40%	30%				19
Half Moon Bay	**41%**	34			29%			29%							14
Hillsborough	**23%**	22										40%			5
Milbrae	**36%**	33			67%	25%		33%					25%		12
Pacifica	**38%**	39			47%			27%	33%						15
Redwood City	**41%**	105	28%		63%	26%		26%							43
San Bruno	**25%**	51		31%						31%	38%				13
San Mateo	**48%**	112	30%		38%						28%				53
South San Francisco	**30%**	331	19%		58%		28%			17%					98
Race/Ethnicity															
African American	**79%**	107		25%	25%			25%		28%		27%			85
Asian	**42%**	281			38%			28%		21%		21%			117
Hispanic	**49%**	253	28%		60%		26%	26%							125
Other Race	**43%**	105	22%		49%		24%								45
Non-Hispanic White	**31%**	351			40%			19%	23%		25%				108
Tenure															
Homeowner	**26%**	348								24%	22%	23%			91
Renter	**45%**	687			48%		20%	24%							310
Precariously Housed	**61%**	208			42%			22%		25%					126
Income															
Less than $25,000	**64%**	199			47%			31%	29%						127
$25,000-$49,999	**65%**	158			48%			21%		20%	20%				103
$50,000-$99,999	**38%**	302	21%		51%	24%									114
Above $100,000	**18%**	346				27%	16%			20%				16%	64
Household Characteristics															
Children under 18	**51%**	558			42%			26%		19%					283
Large Households	**43%**	171	27%		64%	41%									74
Single Parent	**74%**	189			41%			27%		25%					138
Disability	**54%**	446			39%			21%		25%					239
Older Adults (age 65+)	**44%**	350			35%					22%		21%			153

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Experience using housing vouchers. It is **"difficult" or "very difficult" for eight out of 10 voucher holders to find a landlord that accepts a housing voucher** (Figure 13).

As shown in Figure 12, this is related to the amount of the voucher and current rents and the lack of supply (inability to find a unit in the allotted amount of time). Over half of voucher holders (53%) who experienced difficulty indicated the *voucher is not enough to cover the rent for places I want to live* and almost half of voucher holders (49%) who experienced difficulty indicated there is *not enough time to find a place to live before the voucher expires.*

Other significant difficulties using vouchers identified by respondents included *landlords have policies of not renting to voucher holders* (46%) and *can't find information about landlords that accept Section 8* (36%).

Among respondents by race/ethnicity, African American respondents had the greatest proportion of those with a housing choice voucher (60%). Of those respondents, 76% found it difficult to find a landlord that accepts a housing voucher. While 13% of Hispanic respondents have a housing voucher, 85% have found it difficult to use the voucher. Fourteen percent of Asian respondents have housing vouchers—nearly three quarters of these respondents reported that the *voucher is not enough to cover the rent for the places I want to live*.

Other groups of respondents with higher proportions of voucher utilization include single parent households (43%), precariously housed respondents (30%), and households with income below $25,000 (29%). For each of the aforementioned groups, more than 75% of their respective respondents reported difficulty in utilizing the housing choice voucher. The *voucher is not enough to cover the rent for places I want to live* was one of the main reasons cited for not using the voucher.

Figure 12. Why is it difficult to use a housing voucher?

Source:

Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

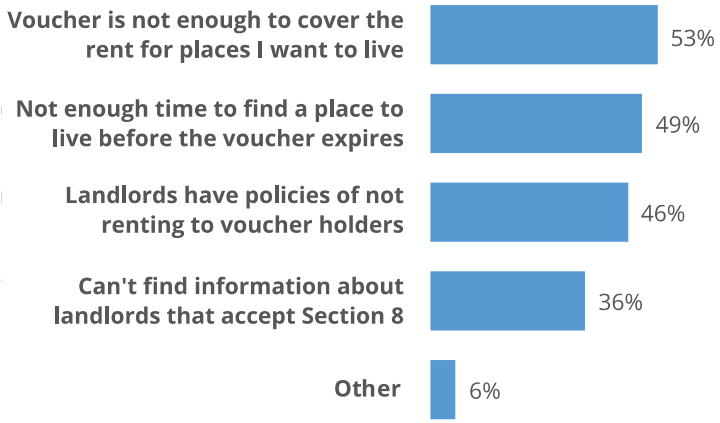


Figure 13. How difficult is it to find a landlord that accepts a housing voucher?

	Percent with a Housing Voucher	Not difficult	Somewhat difficult	Very difficult	n	Voucher is not enough to cover the rent for places I want to live	Not enough time to find a place to live before the voucher expires	Landlords have policies of not renting to voucher holders	Can't find information about landlords that accept Section 8	Other	n
Jurisdiction											
County	**12%**	18%	55%	27%	250	53%	49%	46%	36%	6%	203
Belmont	**16%**	14%	64%	21%	81	45%	64%	36%	27%	9%	11
Brisbane	**22%**	20%	73%	7%	15	50%	50%	42%	33%	0%	12
Burlingame	**8%**	0%	75%	25%	12	50%	50%	25%	8%	0%	12
Daly City	**12%**	14%	50%	36%	14	83%	25%	42%	17%	25%	12
East Palo Alto	**14%**	29%	57%	14%	7	20%	20%	40%	60%	0%	5
Foster City	**12%**	18%	47%	35%	17	47%	40%	27%	33%	7%	15
Half Moon Bay	**19%**	22%	56%	22%	9	71%	29%	29%	43%	14%	7
Hillsborough	**8%**	25%	75%	0%	4	67%	67%	33%	0%	0%	3
Milbrae	**22%**	50%	20%	30%	10	60%	40%	20%	40%	0%	5
Pacifica	**11%**	13%	50%	38%	8	86%	43%	43%	43%	0%	7
Redwood City	**16%**	13%	61%	26%	23	40%	50%	70%	45%	5%	20
San Bruno	**12%**	9%	64%	27%	11	40%	60%	50%	10%	10%	10
San Mateo	**24%**	24%	50%	26%	38	43%	54%	43%	39%	7%	28
South San Francisco	**4%**	11%	33%	56%	27	63%	50%	71%	63%	8%	24
Race/Ethnicity											
African American	**60%**	24%	60%	16%	82	55%	52%	40%	31%	6%	62
Asian	**14%**	23%	63%	14%	71	73%	44%	31%	31%	0%	55
Hispanic	**13%**	15%	40%	45%	53	58%	42%	51%	49%	11%	45
Other Race	**19%**	29%	50%	21%	28	55%	45%	65%	35%	5%	20
Non-Hispanic White	**8%**	14%	61%	25%	64	43%	61%	57%	38%	4%	56
Tenure											
Homeowner	**8%**	23%	59%	18%	78	58%	49%	42%	31%	0%	59
Renter	**18%**	19%	52%	30%	165	55%	52%	48%	43%	6%	134
Precariously Housed	**30%**	14%	66%	20%	86	57%	54%	35%	26%	7%	74
Income											
Less than $25,000	**29%**	17%	58%	25%	84	47%	41%	47%	37%	10%	70
$25,000-$49,999	**18%**	17%	52%	31%	48	63%	55%	63%	40%	5%	40
$50,000-$99,999	**12%**	23%	52%	26%	62	55%	55%	51%	37%	2%	49
Above $100,000	**5%**	20%	57%	23%	35	43%	61%	29%	32%	4%	28
Household Characteristics											
Children under 18	**21%**	20%	60%	20%	179	59%	51%	44%	35%	1%	143
Large Households	**7%**	20%	45%	35%	20	63%	56%	63%	56%	6%	16
Single Parent	**43%**	17%	58%	24%	103	62%	52%	38%	33%	2%	85
Disability	**22%**	18%	58%	24%	158	57%	52%	42%	29%	5%	129
Older Adults (age 65+)	**17%**	18%	63%	19%	123	56%	53%	44%	34%	3%	102

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Displacement. Figure 14 presents the proportion of residents who experienced displacement in the past five years, as well as the reason for displacement.

- Overall, 21% of survey respondents experienced displacement in the past five years. Among all survey respondents, the **main reason for displacement was rent increased more than I could pay** (29%).

- Respondents who are precariously housed have higher rates of recent displacement than homeowners or renters; this suggests that when displaced a unit these housing-insecure tenants are more likely to couch surf or experience homelessness for some period of time before securing a new place to live.

- Among respondents by race/ethnicity, **African American respondents reported the highest rate of displacement** (59%). The primary reason reported by African American respondents for their displacement was *housing was unsafe (e.g., domestic assault, harassment)*. Twenty eight percent also reported that they were *forced out for no reason*.

- Asian households, as well as homeowners, households that make less than $25,000, single parent households, households that include a member experiencing a disability, and Millbrae, Brisbane and Pacifica residents are also more likely than other respondents to have been displaced due to an unsafe housing situation (e.g., domestic assault, harassment).

- Additionally, Asian, precariously housed respondents, households making less than $25,000, single parent households, and Hillsborough residents are more likely than other respondents to have been displaced and not given a reason.

For respondents that had experienced displacements, they were asked to identify which city they moved from and which city they moved to. **The most common moves to and from cities included**:

- Moved within South San Francisco (28 respondents)
- Moved from outside San Mateo County to San Mateo (10 respondents)
- Moved from San Bruno to South San Francisco (9 respondents)
- Moved from Daly City to South San Francisco (9 respondents)
- Moved within Burlingame (8 respondents)

Figure 14. Displacement Experience and Reasons for Displacement

			Reason for Displacement													
	Percent Displaced	Total n	Rent increased more than I could pay	Personal/ relationship reasons	Landlord was selling the home/ apartment	Landlord wanted to move back in/move in family	Landlord wanted to rent to someone else	Landlord refused to renew my lease	Housing was unsafe (e.g., domestic assault, harassment)	Forced out for no reason	Health/medical reasons	I was behind on rent	Poor condition of property	Because of apartment rules	Utilities were too expensive/ shut off	Natural disaster/ flooding/ fire	n
Jurisdiction																	
County	**21%**	2066	29%	19%	18%					31%							417
Belmont	**26%**	80	25%					25%						30%			20
Brisbane	**24%**	67				25%			31%			25%					16
Burlingame	**22%**	152	24%		30%	18%											33
Daly City	**25%**	115	35%	27%						31%							26
East Palo Alto	**32%**	50	20%	20%			20%										15
Foster City	**11%**	130			21%	21%				21%	43%						14
Half Moon Bay	**31%**	51			31%	25%											16
Hillsborough	**12%**	52				33%	33%			33%	33%		33%				6
Milbrae	**27%**	44					42%		33%		25%					25%	12
Pacifica	**21%**	75			31%				31%	31%							16
Redwood City	**29%**	146	31%									21%					42
San Bruno	**25%**	89	33%	29%					24%								21
San Mateo	**37%**	153	35%	31%							20%						54
South San Francisco	**12%**	712	42%	15%	16%												81
Race/Ethnicity																	
African American	**59%**	134				29%			30%	28%							79
Asian	**22%**	500				31%			22%	22%							109
Hispanic	**29%**	397	33%	22%									18%				115
Other Race	**28%**	149	54%						20%						24%		41
Non-Hispanic White	**14%**	757	27%	20%	31%												102
Tenure																	
Homeowner	**8%**	975		27%		25%			31%								75
Renter	**34%**	905	32%	18%	22%												292
Precariously Housed	**48%**	280	23%				24%			23%							132
Income																	
Less than $25,000	**45%**	282	28%	20%					20%	20%							127
$25,000-$49,999	**30%**	265	31%		19%							18%					78
$50,000-$99,999	**22%**	517	32%	22%	18%												115
Above $100,000	**8%**	721			27%	20%	23%										60
Household Characteristics																	
Children under 18	**30%**	840	27%			20%	19%										249
Large Households	**20%**	284	32%		19%								18%				57
Single Parent	**55%**	240				24%			24%	20%							131
Disability	**34%**	711	26%	20%			20%		20%								241
Older Adults (age 65+)	**22%**	736	23%	22%		22%											162

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Children changing schools after displacement. Overall, for households with children that were displaced in the past five years, **60% of children in those households have changed schools**. The most common outcomes reported among these respondents included *school is more challenging* (28%), *they feel less safe at the new school* (25%), and *they are in a worse school* (24%) (Figure 15).

Among respondents by race/ethnicity, non-Hispanic White households (44%) were the only subgroup to report that being displaced resulted in their children being in better schools. Of African American households that were displaced and have children, 87% reported that their children changed schools. Of these respondents, 32% reported that their children *feel safer at the new school* but also *have fewer activities.*

Among respondents by tenure, precariously housed (78%) and homeowner (74%) households had the highest proportion of children who changed schools. The most common outcomes for precariously housed households included *School is less challenging/they are bored* (35%) and their children *feel less safe at school* (34%). For homeowner households, 39% reported that *school is more challenging,* followed by 31% who reported that their children *feel less safe at school*.

Among respondents by selected household characteristics, older adult (77%), single parent (74%), households with a member experiencing a disability (70%), and households with children under 18 (67%) all reported high proportions of children who changed schools. The most common outcomes for these respondents included *School is more challenging* and *they feel less safe at the new school.*

Figure 15. Children Changing Schools and Outcomes, Displaced Households

	Percent of Children that Changed Schools	Total n	School change outcomes									
			School is less challenging/ they are bored	School is more challenging	They are in a better school	They are in a worse school	They feel less safe at the new school	They feel safer at the new school	They have fewer activities	They have more activities	Things are about the same	n
Jurisdiction												
County	**60%**	306		28%		24%	25%					183
Belmont	**45%**	20		33%		44%	33%					9
Brisbane	**81%**	16		38%			31%	31%				13
Burlingame	**55%**	22	33%	33%						33%		12
Daly City	**41%**	17	43%		29%		29%			29%		7
East Palo Alto	**54%**	13	43%	57%			29%					7
Foster City	**62%**	13								50%		8
Half Moon Bay	**58%**	12		43%			29%	29%	43%			7
Hillsborough	**60%**	5						67%				3
Milbrae	**82%**	11		33%		44%	44%	33%				9
Pacifica	**91%**	11				50%						10
Redwood City	**52%**	23			25%	33%		25%				12
San Bruno	**67%**	18	33%		33%		33%					12
San Mateo	**66%**	35	32%		32%							22
South San Francisco	**36%**	56		26%	26%						26%	19
Race/Ethnicity												
African American	**87%**	69	30%	30%				32%	32%			60
Asian	**73%**	91	27%	32%		32%	27%					66
Hispanic	**49%**	91		23%		30%	23%		25%			44
Other Race	**65%**	31		40%		30%	25%	25%				20
Non-Hispanic White	**60%**	60	28%	31%	44%		28%					36
Tenure												
Homeowner	**74%**	66		39%		29%	31%					49
Renter	**58%**	213	25%	30%			25%					122
Precariously Housed	**78%**	104	35%				34%		30%			80
Income												
Less than $25,000	**65%**	92	22%	32%			35%					60
$25,000-$49,999	**66%**	56	25%			28%		28%	25%			36
$50,000-$99,999	**55%**	85		30%	28%		23%					47
Above $100,000	**59%**	44	35%	31%		38%						26
Household Characteristics												
Children under 18	**67%**	237		32%		23%	25%					158
Large Households	**45%**	44		32%	26%						32%	19
Single Parent	**74%**	124		32%		28%	29%					92
Disability	**70%**	188	26%	28%			30%					132
Older Adults (age 65+)	**77%**	117		35%		29%	29%					89

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Experience with housing discrimination. Overall, **19% of survey respondents felt they were discriminated against when they looked for housing** in the area.[1] As shown in Figure 16, African American respondents (62%), single parent households (44%) and precariously housed respondents (39%) are most likely to say they experienced housing discrimination. Residents with income above $100,000 and homeowners are least likely (11%).

Respondents who believed they experienced discrimination when looking for housing in the county reported when the discrimination occurred. Nearly half of respondents (45%) reported that the discrimination they experienced occurred between 2 and 5 years ago. Twenty eight percent of respondents reported that the discrimination occurred in the past year, 20% reported more than 5 years ago and 7% of respondents did not remember when the discrimination occurred.

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

Among top responses for actions taken in response to experienced discrimination, every group reported *Nothing/I wasn't sure what to do* with the exception of African American and single parent households, as well as Brisbane and Hillsborough residents. Similarly, survey respondents from Foster City and Pacifica were the only groups not to include *Moved/found another place to live* among their top responses. African American and Asian households, as well as single parent households, were more likely than other groups to contact either a housing authority, local fair housing organization, or the California Department of Housing or Civil Rights to report their discrimination incident.

Reasons for discrimination. Respondents who believed they experienced discrimination when looking for housing in the county provided the reasons why they thought they were discriminated against. Note that the basis offered by residents is not necessarily protected by federal, state, or local fair housing law, as respondents could provide open-ended and multiple reasons why they thought they experienced discrimination.

Examples of how respondents described why they felt discriminated against, which they provided as open-ended responses to the survey, include:

[1] Note that this question applies to all respondents, not just those who seriously looked for housing in the past five years.

Appearance/Characteristics

- *"Because of my race and ethnicity"*
- *"[We] were given a subprime loan for home purchase for being Latinx, low-income and primarily Spanish-speaking; refinance last year was lower than expected."*
- *"It was clear my disability is the reason"*
- *"I have a child and a couple places told me they wouldn't rent to me due to my son."*
- *"The agent asked if I was a tech worker. When I said no, the agent said the place was just rented, even though it was on the listing as active."*
- *"I was approved for the unit and when they met my partner, who is Black, they said [the unit] was rented."*

Source of Income/Credit

- *"Income was through SSDI [social security disability insurance]"*
- *"The landlord wanted an excellent credit score…"*
- *"We were not able to provide all the requirement to rent, like SSN [social security number], income proof, employment, and we don't make enough income…"*
- *"They wanted someone with income from employment not due to disability."*
- *"I was discriminated against because of my race and the fact that I had Section 8 at the time. Being African American and having Section 8 made a lot of people feel like I wouldn't take care of their property."*
- *"I am currently being discriminated against due to my need with rental help and because two of us in our household have a need for an emotional support animal."*

Immigration status

- *Mi hermana llamo a los departamentos donde yo vivo y la manager le dijo que no había disponible pero no era verdad también le dijo que hablara inglés y le pidió seguro social pensando que no tenia y le dijo que tenía que ganar una cierta cantidad de dinero para poder rentar. (My sister called the apartments where I live and the manager told her that there was no one available but it was not true. She also told her to speak English and asked for social security thinking that she did not have it and told her that she had to earn a certain amount of money to be able to rent).*

Figure 16. Percent of respondents who felt they were discriminated against and how was it addressed

	Percent who felt they were discriminated against	In the past year	2 to 5 years ago	More than 5 years ago	Don't remember	n	Nothing/ I wasn't sure what to do	Moved/ found another place to live	Nothing/ I was afraid of being evicted/ harassed	Called/ emailed housing authority	Called/ emailed local fair housing organization	Called/ emailed California Department of Housing/ Civil Rights	Called/ emailed City office, County office, or human rights department/ agency	Filed a complaint	Other	n
Jurisdiction																
County	**19%**	28%	45%	20%	7%	357	42%	30%	20%							359
Belmont	**21%**	19%	56%	19%	6%	16	38%	38%	50%							16
Brisbane	**22%**	29%	36%	29%	7%	14		64%			21%		21%			14
Burlingame	**14%**	25%	50%	20%	5%	20	35%	25%		20%		20%				20
Daly City	**15%**	20%	40%	33%	7%	15	56%	25%	25%							16
East Palo Alto	**29%**	23%	54%	15%	8%	13	38%	38%	23%	23%						13
Foster City	**18%**	15%	40%	45%	0%	20	38%						24%	24%		21
Half Moon Bay	**26%**	27%	55%	9%	9%	11	27%	36%			36%					11
Hillsborough	**15%**	14%	71%	0%	14%	7		29%			57%					7
Milbrae	**29%**	36%	50%	7%	7%	14	31%	23%		38%		23%				13
Pacifica	**21%**	29%	36%	36%	0%	14	50%		21%	29%		21%			21%	14
Redwood City	**24%**	34%	34%	19%	13%	32	47%	26%	21%	21%						34
San Bruno	**12%**	30%	60%	0%	10%	10	50%	30%		30%	30%					10
San Mateo	**30%**	35%	45%	15%	5%	40	53%	26%	26%							38
South San Francisco	**13%**	30%	40%	23%	6%	82	59%	27%								83
Race/Ethnicity																
African American	**62%**	16%	59%	25%	0%	83		36%	29%	27%	26%	27%	24%			84
Asian	**16%**	24%	50%	20%	6%	82	28%	25%	29%	29%	24%	24%				83
Hispanic	**27%**	25%	42%	24%	8%	107	52%	27%								107
Other Race	**30%**	28%	47%	14%	12%	43	47%	30%	26%							43
Non-Hispanic White	**12%**	38%	41%	14%	7%	91	44%	27%	18%							91
Tenure																
Homeowner	**11%**	26%	46%	20%	7%	95	32%	29%	22%							96
Renter	**28%**	26%	47%	20%	6%	232	42%	32%	23%							232
Precariously Housed	**39%**	21%	54%	20%	4%	98	24%	28%		35%		26%				100
Income																
Less than $25,000	**36%**	29%	51%	11%	9%	100	39%	30%	25%							102
$25,000-$49,999	**24%**	31%	41%	22%	6%	64	42%	36%	25%	22%						64
$50,000-$99,999	**19%**	27%	45%	25%	3%	97	44%	29%			18%					97
Above $100,000	**11%**	28%	45%	21%	7%	76	45%	22%	16%	16%						76
Household Characteristics																
Children under 18	**26%**	21%	57%	15%	6%	216	36%	31%	26%							218
Large Households	**19%**	26%	52%	9%	13%	54	65%	24%	15%							55
Single Parent	**44%**	13%	65%	17%	5%	106		33%	32%	27%	26%	26%				107
Disability	**33%**	27%	48%	21%	4%	215	33%	30%		22%						219
Older Adults (age 65+)	**20%**	20%	51%	20%	8%	144	24%	34%	24%	24%						146

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Experience of persons with disabilities. Overall, 35% of respondents' households include a member experiencing a disability. Of these households, 26% said their housing does not meet their accessibility needs; 74% report that their current housing situation meets their needs. The three top greatest housing needs expressed by respondents included grab bars in bathroom or bench in shower (34%), supportive services to help maintain housing (33%), and ramps (26%). Other needs expressed by a substantial proportion of groups included *wider doorways, reserved accessible parking spot by the entrance,* and *more private space in the facility in which I live*.

Of respondents by jurisdiction, East Palo Alto (64%) has the lowest proportion of respondents with disabilities whose current housing situation meets their needs. Of these respondents, 63% indicated they needed supportive services to help maintain housing.

The highest proportion of respondents by group reporting that they or a member of their household experiences a disability were African American (71%), households making less than $25,000 (59%), single parent households (58%), and precariously housed respondents (56%).

Figure 17. Respondents experiencing a disability and their top three greatest housing needs

	Percent of respondents with a disability	Current housing situation meeting needs	Total n	Grab bars in bathroom or bench in shower	Supportive services to help maintain housing	Ramps	Wider doorways	Reserved accessible parking spot by entrance	More private space in the facility in which I live	Service or emotional support animal allowed	Would like to live alone (not with a roommate)	Fewer restrictions/ more freedom	Alarm to notify if a non-verbal child leaves the home	Fire alarm/doorbell made accessible for person with hearing disability/deaf	Better navigation for person who is blind	n
Jurisdiction																
County	35%	74%	711	34%	33%	26%										171
Belmont	35%	89%	28	67%	67%											3
Brisbane	37%	72%	25	29%	29%		29%	29%								7
Burlingame	27%	80%	41	63%	50%		50%									8
Daly City	34%	68%	38		36%		36%		45%		36%					11
East Palo Alto	44%	64%	22		63%											8
Foster City	31%	83%	40		29%		29%									7
Half Moon Bay	45%	68%	22	29%								29%				7
Hillsborough	26%	100%	13													n/a
Milbrae	40%	82%	17	25%					25%	25%			25%	25%	25%	4
Pacifica	39%	93%	29				100%									2
Redwood City	42%	68%	62	33%	28%	28%			33%							18
San Bruno	40%	82%	34	50%		33%		33%								6
San Mateo	43%	72%	65	41%	47%					41%						17
South San Francisco	30%	68%	210	35%	28%	32%										57
Race/Ethnicity																
African American	71%	87%	95		40%		40%	33%								15
Asian	31%	77%	157	29%	34%	26%			26%							35
Hispanic	41%	70%	162	37%	54%				35%							46
Other Race	38%	71%	56	63%		50%	44%									16
Non-Hispanic White	32%	77%	241	33%		27%		21%								52
Tenure																
Homeowner	29%	82%	280	35%		37%		37%								43
Renter	39%	73%	347	41%	40%				27%							88
Precariously Housed	56%	71%	154		37%		26%				33%					43
Income																
Less than $25,000	59%	71%	167		42%				27%		23%					48
$25,000-$49,999	40%	67%	107		45%	45%	45%									31
$50,000-$99,999	35%	77%	180	43%	26%	24%										42
Above $100,000	23%	82%	167	52%		34%		41%								29
Household Characteristics																
Children under 18	35%	78%	293		40%		29%		32%							63
Large Households	35%	70%	99	41%	45%				34%							29
Single Parent	58%	81%	139		48%		28%		41%							29
Older Adults (age 65+)	46%	76%	337	44%	29%	30%										79

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Transportation. Over 80% of respondents indicated the type of transportation used most often is driving a personal vehicle. This share was relatively similar across the majority of jurisdictions and was the number one type of transportation used across all jurisdictions and demographic characteristics.

The groups with the lowest proportion of those who primarily drive included African American (40%), households making less than $25,000 (53%), single parents (57%), and precariously housed (57%) respondents.

As shown in Figure 18, on average respondents are fairly satisfied with their transportation situation. Those groups somewhat or not at all satisfied with their transportation options include African American (58%), Brisbane (51%), single parents (45%) and precariously housed (44%) respondents.

Figure 18. Are you satisfied with your current transportation options?

Source:

Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

	Entirely satisfied	Mostly satisfied	Somewhat unsatisfied	Not at all satisfied	n
Jurisdiction					
County	29%	45%	20%	6%	1,903
Belmont	21%	42%	27%	10%	78
Brisbane	17%	33%	38%	13%	64
Burlingame	32%	45%	21%	1%	139
Daly City	19%	52%	20%	8%	109
East Palo Alto	31%	36%	24%	9%	45
Foster City	29%	43%	20%	9%	115
Half Moon Bay	30%	35%	26%	9%	46
Hillsborough	50%	34%	14%	2%	44
Milbrae	30%	45%	13%	13%	40
Pacifica	28%	42%	15%	15%	65
Redwood City	30%	36%	27%	8%	142
San Bruno	23%	54%	19%	4%	81
San Mateo	29%	52%	14%	4%	134
South San Francisco	34%	48%	15%	3%	666
Race/Ethnicity					
African American	22%	21%	48%	10%	134
Asian	23%	49%	24%	4%	500
Hispanic	29%	43%	22%	7%	397
Other Race	29%	41%	21%	9%	149
Non-Hispanic White	32%	45%	17%	5%	757
Tenure					
Homeowner	31%	45%	18%	6%	905
Renter	27%	44%	23%	6%	834
Precariously Housed	20%	36%	35%	9%	254
Income					
Less than $25,000	22%	39%	29%	10%	282
$25,000-$49,999	25%	42%	26%	8%	265
$50,000-$99,999	28%	52%	16%	4%	517
Above $100,000	34%	44%	18%	4%	721
Household Characteristics					
Children under 18	25%	43%	25%	6%	840
Large Households	29%	50%	18%	4%	284
Single Parent	20%	36%	38%	7%	240
Disability	25%	40%	27%	8%	658
Older Adults (age 65+)	30%	43%	21%	6%	736

Solutions offered by residents. Respondents were asked a series of questions about how to improve their situations related to housing, employment, health, education and neighborhood.

Improve housing security. When asked what could improve a respondent's housing security, the top answers among respondents by jurisdiction, race/ethnicity, tenure, income, and other selected housing characteristics were *none of the above* and *help me with a downpayment/purchase.*

The highest proportion of respondents among groups that selected *None of the above* includes:

- Hillsborough residents, 71%
- Owners, 65%
- Income greater than $100,000, 54%
- Foster City residents, 53%
- White, 51%
- Burlingame residents, 50%

The highest proportion of respondents among groups that selected *Help me with a downpayment or purchase* includes:

- Renters, 44%
- Large households, 42%
- Daly City residents, 41%
- Hispanic, 39%
- Precariously housed, 39%
- City of San Mateo residents, 37%

Other solutions to improve housing security identified by several different groups included *Help me with the housing search, help me pay rent each month,* and f*ind a landlord who accepts Section 8.* The highest proportion of respondents among groups that selected these solutions includes:

Help me with the housing search

- Precariously housed, 39%
- Income less than $25,000, 34%
- Income between $25,000-$50,000, 29%

- Half Moon Bay residents, 27%

Help me pay rent each month

- Income less than $25,000, 35%
- Single parent, 31%

Find a landlord who accepts Section 8

- Black or African American, 37%

Improve neighborhood situation. When asked what could improve a respondent's neighborhood situation, nearly every respondent group by jurisdiction, race/ethnicity, tenure, income, and other selected housing characteristics identified *Better lighting.* Other solutions flagged by multiple respondent groups to improve their neighborhood situations includes *Improve street crossings* and *none of the above.*

The highest proportion of respondents among groups that selected *Better lighting* includes:

- East Palo Alto residents, 45%
- Millbrae residents, 45%
- Other race, 42%
- Daly City residents, 41%
- Hispanic, 40%
- Income between $25,000-$50,000, 40%
- Income between $50,000-$100,000, 40%

The highest proportion of respondents among groups that selected *Improve street crossings* includes:

- City of San Mateo residents, 34%
- Single parent, 31%

The highest proportion of respondents among groups that selected *None of the above* includes:

- Foster City residents, 37%
- Hillsborough residents, 36%
- Burlingame residents, 28%

Additionally, 42% of Millbrae respondents chose *Reduce crime,* 40% of Brisbane respondents chose *More stores to meet my needs,* and Belmont (34%) and Half Moon Bay (33%) respondents chose *Build more sidewalks.*

Improve health situation. When asked what could improve a respondent's health situation, the majority of respondent groups by jurisdiction, race/ethnicity, tenure, income, and other selected housing characteristics selected *Make it easier to exercise, More healthy food* and *None of the above.*

The highest proportion of respondents among groups that selected *Make it easier to exercise* includes:

- Redwood City residents, 48%
- Hispanic, 42%
- South San Francisco residents, 41%
- City of San Mateo residents, 41%
- Asian, 41%
- Renters, 40%

The highest proportion of respondents among groups that selected *More healthy food* includes:

- East Palo Alto residents, 48%
- Precariously Housed, 47%
- Single parent, 41%
- Daly City residents, 40%
- Income less than $25,000, 38%
- Black or African American, 37%
- Large Households, 37%

The highest proportion of respondents among groups that selected *None of the above* includes residents from:

- Hillsborough residents, 48%
- Burlingame residents, 47%
- Foster City residents, 42%
- White, 41%
- Owners, 39%

Additionally, African American (34%) and San Bruno (29%) respondents identified *Better access to mental health care* as a solution to help improve their health situations.

Improve job situation. When asked what could improve a respondent's employment situation, the majority of respondent groups by jurisdiction, race/ethnicity, tenure, income, and other selected housing characteristics selected *Increase wages* and *None of the above.*

The highest proportion of respondents among groups that selected *Increase wages* includes:

- Renters, 52%
- Single parents, 50%
- Hispanic, 49%
- Households with children, 49%
- Daly City residents, 49%
- Income between $50,000-$100,000, 49%
- Large households, 48%

The highest proportion of respondents among groups that selected *None of the above* includes:

- Hillsborough residents, 76%
- Owners, 58%
- White, 57%
- Over 65+, 53%
- Income greater than $100,000, 53%
- Foster City residents, 53%

Additionally, 29% of households with income less than $25K identified *Find a job near my apartment or house* as a solution to help improve their situation.

Improve education situation. When asked what could improve a respondent's education situation for their children, the majority of respondent groups by jurisdiction, race/ethnicity, tenure, income, and other selected housing characteristics selected *None of the above, Have more activities,* and *Stop bullying/crime/drug use at school.*

The highest proportion of respondents among groups that selected *None of the above* includes:

- Burlingame residents, 55%

- White, 52%
- Over 65+, 51%
- Hillsborough residents, 49%
- Foster City residents, 46%
- Brisbane residents, 45%

The highest proportion of respondents among groups that selected *Have more activities* includes:

- Single parent, 45%
- Households with children, 41%
- Large households, 41%
- Other race, 37%
- Daly City residents, 34%
- Hispanic, 34%

The highest proportion of respondents among groups that selected *Stop bullying/crime/drug use at school* includes:

- East Palo Alto residents, 38%
- Precariously housed, 31%
- Other race, 30%
- Redwood City residents, 29%
- Hispanic, 29%
- San Mateo residents, 28%

Additionally, 29% of Millbrae respondents identified *Have better teachers at their schools* as a means to improve the education situation in their respective households.

21 Elements Engagement

Countywide Meetings (March 30 & May 6, 2021) Summary

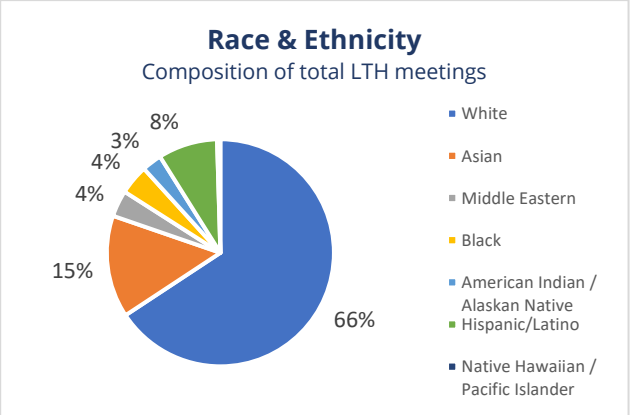
Countywide Meeting Summary

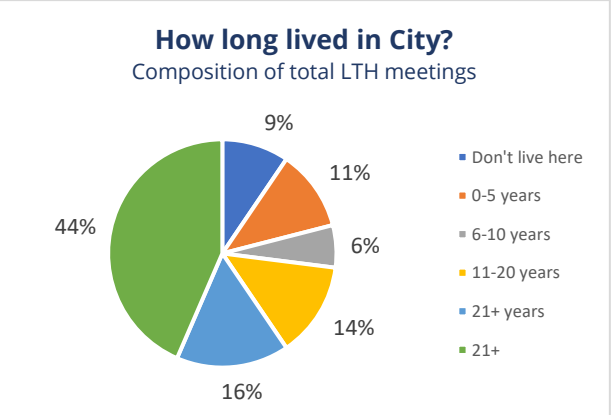
Millbrae: Introducing the Housing Element Update

A series of countywide meetings about the Housing Element update were held from March to May 2021. Each meeting provided community members with an introduction the Housing Element update, why it matters, information on the Let's Talk Housing outreach effort and countywide trends. Breakout room discussions with individual cities and towns followed.

Who We Heard From

In total 1,024 registered for the series and 264 registered for the All About RHNA meeting. Of those who registered for the series, the majority identified as White (66%) or Asian (15%), and were 50 years or older; nearly half were 50 to 69 years old and almost a fifth were over 70. Almost half had lived over 21 years in their homes, and three-fourths owned their own homes.





Millbrae was part of the March 30th introductory meeting, along with Burlingame, East Palo Alto, Hillsborough and San Mateo City. Due to technical difficulties, a second meeting was held on May 6th. Three people who registered identified that they lived in Millbrae, all of whom live here. Two of the three have lived here between 6 and 10 years, and two of them are owners of their homes. Demographically, 100% of them identified as White.

Countywide Meeting Summary

What We Heard

Main Meeting

People were asked to share a word in the chat describing housing now at the beginning of the meeting, and the housing they envisioned in their communities ten years from now.

Now

In 2030

Breakout Session

The Millbrae session had a productive conversation about the importance of creating more housing near transit. The participants also voiced that they valued a walkable city and expressed a desire that housing be able to support a lively commercial district. Participants also want housing that is accessible to all incomes and physical abilities, with diversity in the housing types, as well as able to specifically withstand noise pollution. There was also strong interest in upgrading older buildings and expanding affordable housing options.

Post Event Survey

The post-event survey reflected the variety of opinions present on issues ranging from a desire to preserve communities as they are, to an appeal for more and diverse housing everywhere in the county. Despite the technical difficulties of the first meeting, community members responded that they valued the space and the information provided within it and looked forward to spaces where more meaningful and engaged discussion could take place.

21 Elements Engagement

Countywide Meetings (March 30 & May 6, 2021) Appendix

Millbrae Appendix

Main Meeting

Comment or Questions

Meeting 1

What obligations do cities have to reduce segregation in the next housing element cycle?
what does it mean to affirmatively further fair housing?
can the cities challenge state mandate housing quotas?
What are the consequences if a city is not meeting its housing element?
Do any consequences for not making 5th cycle RHNA numbers flow over to 6th cycle? Does everyone start over at square 1?
How can cities work together as a region when updating their housing elements?
how are possible permanent changes due to the pandemic being studied? e.g. population shifts, working from home vs in an office, vacancy rates both residential and commercial, etc.
When did the gap between jobs and housing begin to grow? I heard that this is a problem that began before the tech boom (or even the dot com boom)

Meeting 2 (5/6)

what is the gold standard for community engagement? Like how many public meetings? Mailings? Are planning commission and city council meetings sufficient? Should citizen advisory committees be involved?
Is this a General Plan for the whole County or for each city?
It is extremely difficult to have rent increased substantially from year to year. I am a senior with a teenage son.
If cities aren't having housing element outreach meetings outside of council or planning commission meetings, would cities be a non-compliant with AFFH?

Responses to facilitator questions:

What are things you like about Millbrae?

Activity Notes:

Meeting #1 - March 30, 2021:

- Lives close to transit center at ECR/Chadbourne. Millbrae has great examples of missing middle housing between Millbrae Ave & Victoria.
- Gateway at Millbrae station is a great example of the project.
- Gateway at Millbrae station great example of housing- and affordable housing- close to transit.
- Transit stations and the high density housing built around it.

Meeting #2 - May 6, 2021:

- Small town feel that we've had all these years.
- Moved here because it's half way between City (DF) and Silicon Valley. In the middle of all the action, which is exciting and creates lots of opportunities.
- Moved here in 2012 and had 4 kids- moved there for convenience to get to their jobs, and schools are great. Moved from SF and her son is a soccer player and the field of Taylor felt like something right out of a movie. Very happy to have moved here.
- Transit-oriented community- like the easy access

Participant Chat Responses:

Marilyn. I love the small town feel
I like our racial diversity.
the school system!
Community
Transit Access
Diversity, community spirit
the community
trees, friendly people, fresh breeze

2. What are some of our key housing needs, challenges and opportunities?

Activity Notes:

Meeting #1 - March 30, 2021:

- Difficulty to find common ground
- High construction costs have made it so every expensive to buy housing.
- Challenges around scalability of utilities/infrastructure and public safety as Millbrae builds new units.
- Housing development takes too long- must expedite process of parcel assembly, permits, and construction.
- More housing needed now and at deeper affordability levels.
- The start, stop, start nature of the Specific Plan redo makes it hard for people to get charged up and to build momentum.
- Loud and angry opposition to new housing as many see it as attack on their property values. Difficult to find common ground.
- Cost of renting/purchasing has meant that fewer and fewer teachers, fire fighters and police are able to live here, and yet there a lot of value in living with them in the community.
- Need other housing options for those disabled, living on fixed incomes, etc. Cost of living in Millbrae is changing the nature of our community. Older people may not have a choice to stay, which will change the composition of community unless ramp up level of low income housing
- This meeting and the limited input are challenges to participation. Should focus on how to engage community members.
- Not good turn out of community- lots of opinions and voices including those that are opposed to housing that we are not hearing tonight.
- Not enough land

Meeting #2 - May 6, 2021:

- Average rents too high. Have to earn quite a bit of money to live here. Can people who teach our children afford to live in the communities they live?
- When he moved to Millbrae in 2016, they found it valuable to live in a transit-oriented community. But there were few options for people that want to live in an apartment for a reasonable amount of rent. They live in a building on El Camino Real and Chadbourne. They couldn't afford where they wanted to live first. They moved behind the library to an apartment but were quite far from the transit station. Thankfully they got lucky and his partner was able to afford a unit in the TOD building. Not many options. Many apartments are old. No plan for tenants in El Rancho project. Need more options for people to live near transit. Want to give people opportunities.
- Understand pressure to build. Value small town feel but it feels like its going away but being dictated top down. Understand the reasons but it's invading further into her life. Huge development around BART. Have a crime problem because of BART. How is this going to be addressed?
- Make sure housing is sensitive to noise pollution.

Think about trade offs between density, parking, and more housing.

- Income level, rents and mortgages so high pressure on young families and people starting out, as well as not super high incomes.
- Few affordable options for renters especially near transit.
- Good lifestyle, but not many places available to live.
- Concerns about displacement- either through accident (fire) or development.
- Worried about losing small town feel with upzoning and potential increases in crime that might occur
- Parking vs. using the area for housing so how to balance high density with parking needs
- Airport noise and effects on housing
- Not lots of opportunity to be heard with so much going on- ATP, HE, GP, etc

Participant Chat Responses:

Missing middle housing is a big topic, and Millbrae has lots of great examples of that!
Additionally the Millbrae Station is a great example of housing and affordable housing close to transit.
it's frustrating to see how slow it takes for housing to get built.
More housing, streamlining, more opportunities to create affordable housing, human impact of policies.

3. What ideas or suggestions do you have to help meet our housing needs?

Activity Notes:

Meeting #1 - March 30, 2021:

- Inclusionary ordinance combined with more land opportunities.
- Millbrae residents have a lot of concern about where the cars will go and how much traffic. Focus more on where the people will go. Millbrae has high parking requirements. Where he lives would not be legal to build now. Find spaces for people not cars.
- Some of the plans like the Downtown Specific Plan was pretty exciting in terms of the future impact on meeting our housing goals and also revitalizing the downtown area. He is lucky enough to walk there, but a block removed it's all single-family homes, so many people have to drive there to patronize the businesses. So would like to see plans for greater density in downtown with rezoning to R-2 and R-3.
- Lots of examples of nice missing middle neighborhoods in Millbrae with higher zoning.
- Improve walkability.
- Great options for growth near transit.

Meeting #2 - May 6, 2021:

- Shuttle doing a continuous loop might solve the problem of parking and housing all located in one area.
- New construction buildings have good noise reduction so community benefit could be refurbish/upgrade building quality of existing buildings to help with sound quality.
- Housing subsidy for those who work in Millbrae
- Coalition of cities working together to solve the noise issue with airport.

More unique shops and commercial options in Downtown - bakeries, cafes.

Participant Chat Responses:

more density near downtown to create more walkable neighborhoods. Allowing for middle housing in more neighborhoods.

How can we make sure we hear from our entire community?

Activity Notes:

Meeting #1 - March 30, 2021:

- Social media may not capture audience.

Meeting #2 - May 6, 2021:

- Go analog to get more people. Piggy back on other meetings where parents are at, such as schools, PTAs.
- Set up table where kids go to play sports and families are there, or on Broadway. Set up a table in front of Lucky. Paper- low rates of return.
- Have meetings at different times on different days. Evenings are a tough time for people with kids. 7:30 easier than 6:00 for parents. Library. Take a page from tax assistance volunteers who set up shop in Council Chambers.
- Found on Nextdoor. More posts like that helpful. Also follow up posts as they may be missed the first time.
- Online survey where information can be submitted, such as the General Plan and Transportation Plan.
- When the GP/SP started up he was pleasantly surprised at outreach, such as at the Farmers Market. He received a postcard in mail, mentioned a walk in booth.
- City doing a lot this year. When he looked at public outreach infographic there were two open houses and a newsletter. In contrast other cities have citizen commissions working on this. Seems like the only people who are getting regular updates are City Council and Planning Commission. More public engagement needed with so many competing undertakings (GP, ATP, etc)

Participant Chat Responses:

to capture a larger and more diverse audience, partner with local businesses to hand out flyers with their food orders, groceries and other purchases

It's 2030, and we've accomplished a lot! What kind of housing is in our community now?

Activity Notes

Meeting #2 - May 6, 2021:

- Has been walking quite a bit during pandemic. With regards to parking issues, what about a shuttle that does a continuous loop to address concerns about overcrowding in certain areas like downtown.
- Noise lower in new buildings because of construction technology. As we look at opportunities for new housing, there are opportunities to upgrade existing buildings.
- Make opportunities for people to live and work here.

Want shops that offer unique products- cafes and bakeries- and entertainment to create small town feel.
Want downtown business development

21 Elements Engagement

Webinar Series (October – December 2021) Summary

Summary: Let's Talk Housing Zoom webinar and discussion series October – December 2021

Executive Summary

As part of outreach and engagement work for the 6th Cycle Housing Element Update, 21 Elements/Let's Talk Housing organized a countywide 4-part webinar series to help educate and inform San Mateo County residents and stakeholders on regional and local housing issues.

The 4-part series took place on Zoom in fall of 2021, focusing on the following topics and how they intersect with the Bay Area's housing challenges and opportunities:

- Why Affordability Matters
- Housing and Racial Equity
- Housing in a Climate of Change
- Putting it All Together for a Better Future

The series included speaker presentations, audience Q&A, breakout sessions for connection and debrief discussions. The sessions were advertised and offered in Spanish, Mandarin and Cantonese, though participation in non-English channels was limited. Detailed information about speakers and themes are below.

Session recordings and materials are posted on the Let's Talk Housing website (www.letstalkhousing.org) and on the Let's Talk Housing YouTube channel (http://tinyurl.com/lthyoutube).

Creating a More Affordable Future

Session 1: Why Affordability Matters (October 13, 2021)

Speakers: Belén Seara, Mgmt Analyst, Health Policy & Planning, Get Healthy SMC
Nevada Merriman, Director of Policy, MidPen Housing
Josh Abrams, Principal, Baird + Driskell Community Planning
Shane Phillips, UCLA Lewis Center Housing Initiative
Registrants: 188

The first session focused on why housing affordability matters. Belén Seara, Nevada Merriman and Josh Abrams shared why housing affordability matters to public health, community fabric and to San Mateo County residents, families, workers and employers. Josh also walked through how an ordinary single-family home in San Mateo County that once was affordable to a moderate-income family is no longer within reach for most people in the region. Shane Phillips shared data on housing trends and affordability nationwide and locally and provided a brief overview of some of the policy levers that could have an impact on housing affordability in the county.

Approximately 187 people registered to attend the session. Based on responses to our webinar poll, around three-quarters of the respondents were between the ages of 30 and 70 (74%) and identified as White (55%) or Asian (21%). While nearly half (47%) live in San Mateo County and almost a third (30%) work there, over one-fifth (21%) describe their connection to the county as their interest in local housing issues. Around 57% have resided in the region for over 21 years and a majority (59%) of respondents own their homes.

Key Themes:

- Housing affordability is a public health issue: Where we live impacts our health
    - A lack of housing that is affordable means workers have to commute from farther away and cannot spend as much time with their families and in their community
    - A lack of housing that is affordable means employers have a hard time with hiring and retention of workers
    - A lack of housing that is affordable impacts the learning of children and students
- Housing trends in California
    - Housing prices in California have increased much faster than most of the US
    - Housing prices in California have increased much faster than median wages
    - Californians are paying a large share of their income on housing
    - Lots of people want to move to CA and the Bay Area, but few homes are being built
- The Three S's: Supply, Stability and Subsidy
    - Supply: Building enough homes to meet all needs
    - Stability: Protecting renters and other vulnerable households
    - Subsidy: Funding to fill the gaps left by #1 and #2
    - Strengths/weaknesses of each of the 3 S's: we need to work on all three
    - Policies to address each of the 3 S's

Creating a More Affordable Future

Session 2: Housing & Racial Equity (October 27, 2021)

Speakers: Dr. Jessica Trounstine, Professor, UC Merced
Debra Gore-Mann, President and CEO, Greenlining Institute
Registrants: 185

The second session focused on housing and racial equity. Why does where you live matter? Why are our neighborhoods segregated, even though our communities are diverse? What can we do to create more inclusive and equitable communities? Dr. Jessica Trounstine and Debra Gore-Mann walked us through 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 reaching far beyond housing policy alone. Making our housing policies more inclusive and allowing access to more households at all income levels is a key step to dismantling these inequitable systems.

The demographic composition for session 2 was very similar to that of session 1. Approximately, 184 people registered for the session. Of those who completed our poll during the webinar, a majority identified as White (57%), followed by Asians (17%) and Latinxs (15%). Over three-quarters (78%) were between the ages of 30 and 70. Nearly half (46%) live in San Mateo County, over a quarter (28%) work there, and over one-fifth (22%) express interest in housing issues in the county. A majority (54%) have lived there for over 21 years and a majority (54%) own their homes.

Key Themes:

- Definition of segregation: Separation of any group by race or class into different geographic communities. Segregation is usually measured at the whole city or the whole region
- History of segregation and land use:
    - At first, actions in the private market – violence, vigilante activity
    - Restrictive covenants (private agreements) were a powerful mechanism
    - Not struck down by the court until 1948
    - White homeowner neighborhoods felt threatened by black migration
    - Zoning – one of first uses of zoning was to limit where people of color could live
    - Federal government's New Deal programs to spur construction – "redlining" maps for the Federal Housing Administration – bureaucratized racial exclusion
    - Post WWII – from the beginning suburbs have been whiter and wealthier than central cities, though this has changed over time in many places
- Racial segregation changed over time in many places – from racial segregation between neighborhoods within cities, to more segregation between cities
    - Both still exist: Examples of east Menlo Park vs. west Menlo Park; East Palo Alto vs. Palo Alto
- Policies like large minimum lot sizes, restrictions on density, restrictions on multifamily housing, limits on growth, open space preservation, high fees for development, cumbersome review processes all work to codify earlier patterns of racial and economic segregation by preventing change in the housing stock and affecting the cost of housing in places where segregation persists.
- Definition of equity: access to power, the redistribution and provision of additional resources and elimination of barriers to opportunity
- Definition of racial equity: transforming behaviors, institutions and systems that disproportionately harm people of color

Creating a More Affordable Future

- Where you live is connected to health, economic equity, environment and racial justice
  - Pandemic brought many of these conditions to light
  - Commonalities across redlining maps and covid maps and environmental climate impact maps
  - Cannot think of issues separately anymore: housing policy = health policy = climate policy
- Cannot have neutral policies and expect them to undo decades of racist policies
  - "No such thing as a single-issue struggle because we don't live single-issue lives" – Audre Lorde
  - Accumulated wealth, in the US based on homeownership (intergenerational wealth, better credit, can take out a loan)
  - Consolidated power, accumulated profits, more poor people, no middle class anymore
  - Myth of rugged individualism (in fact there were policies in place that helped or prevented one from succeeding)
  - Role of policing
  - One indicator of your ability to exit poverty is how long your commute is
  - Highway barriers, transportation and urban planning dividing communities
- Tools & Solutions
  - Create common interests instead of personal interests
  - Think about what it means to share spaces of decision-making, share power, inclusive, cooperative, regenerative
  - Most powerful tool in local government toolbox is to increase the zoned density of *all* neighborhoods in a city, including more exclusive neighborhoods
  - Note the interconnectedness of racial dimensions of housing and other issues – when you address racist policies, you will see results across multiple systems

Creating a More Affordable Future

Session 3: Housing in a Climate of Change (November 10, 2021)

Speakers: Jessica Mullin, Program Manager, Home For All San Mateo County
Hilary Papendick, Program Manager, Climate Ready San Mateo County
Amanda Brown-Stevens, Executive Director, Greenbelt Alliance
Registrants: 161

The third session focused on the connection between housing policy and climate change. How does more housing *reduce* our greenhouse gas emissions? How does where we build housing impact the climate? Jessica Mullin and Hilary Papendick presented the upcoming Housing & Climate Readiness Toolkit to help jurisdictions develop climate ready housing. Amanda Brown-Stevens walked participants through why (infill) housing policy is climate policy. When we allow housing in locations near existing amenities and transit, we provide lower-emission housing options than the alternatives in greenfield and more far-flung locations.

Although 160 people registered for the third session, only 37 completed our webinar poll. Among poll respondents, most identified as White (57%) or Asian (27%). While 71% of respondents were between the ages of 30 and 70, the remaining sample was nearly equally split between people aged 18 to 29 (14%) and over 70 (16%). As in other sessions, most respondents described their connection to San Mateo County as their place of residence (40%), their place of work (29%), and/or simply their interest in housing issues (30%). Approximately 70% own their homes and over three-fifths (61%) have lived there for over 21 years.

Key Themes:

- Anticipated climate impacts in San Mateo County are significant
- County Housing + Climate-Related Efforts include RHNA and Housing Elements as well as climate resilience planning, SMC Recovery Initiative, Local Hazard Mitigation Plan, Safety Elements
- Definition of Housing and Climate-Readiness: "the same improvements that make homes better able to withstand and recover from weather-related crises also makes them healthier and safer to live in when sheltering in place during a pandemic" (NRDC, 2020)
- Strategies to Promote Climate Ready Housing include:
    1. Require Resilience Considerations in General Plan Updates
    2. City-Level Sea Level Rise Policies
    3. Flood Proof Construction
    4. Stormwater Management and Resilience Policies
    5. Early CAL FIRE Review in General Plan Elements, Hazard Mitigation, and Subdivision Plans
    6. Wildfire Risk Reduction Measures for Plans, Codes, Ordinances, and Project Designs
    7. Urban Tree Canopy Policy
    8. Urban Design for Heat Resilience
    9. Passive Building Design
    10. Cool Roof, Wall, and Pavement Standards
- Climate SMART Development: Communities across the Bay Area reduce emissions and build resilience through climate SMART—Sustainable, Mixed, Affordable, Resilient, Transit-Oriented—development.
- Why does where we build matter?

  - Transportation: In the US - transportation is 30% GHG emissions, in California - transportation is 50% GHG emissions → Shifting to growth within cities could reduce equivalent of 400k cars
  - Other benefits include cost savings on transportation and utilities, improvements to quality of life, more housing choices
- How can building new homes reduce emissions?
  - Where we build matters, even within our region: smaller homes (ADUs, duplexes, fourplexes, etc.) use less energy; zoning changes - no cost path to reduce emissions
  - Building sector GHG emissions: new standards have more sustainable construction and operations. A single-family suburban home produces 3x yearly emissions as an urban home
- What about water?
  - Water is a shared resource: A collective challenge needs a collective solution
  - Water use in California is 10% urban, 40% agricultural and 50% environmental (non-active use) on average
  - Reducing per capita water use in a growing region: The Bay Area can do this through water efficiency and more compact land use. Changes in landscaping could cut water use close to in half for average home
- Benefits of protecting open space: We urgently need more homes, but building homes outside of cities, on open spaces and farmland, can exacerbate climate-related risks
- Climate SMART Development: Local and regional planning, policy making, and development efforts must foster environmental sustainability, community resilience, social equity, and climate justice outcomes

Creating a More Affordable Future

Session 4: Putting it All Together for a Better Future (December 1, 2021)

Speakers: Benjamin Grant, consultant, former Urban Design Policy Director for SPUR
Karen Murray, Partner, Van Meter Williams Pollack
Registrants: 224

The fourth session focused on how design and planning for much-needed new infill housing can be an opportunity to address existing challenges in our communities and make them better for people. Where do we have space to create new housing choices? How do we promote design excellence in new buildings and new communities? Urban design consultant Benjamin Grant shared one vision that illustrates how the Bay Area can allow more housing while protecting our open spaces and addressing affordability, equity and sustainability. He walked participants through three existing placetypes that are relevant to San Mateo County, including artists' renderings of their possible futures. Karen Murray from Van Meter Williams Pollack shared real-life examples of how infill housing can be successfully integrated into existing communities in the county.

Of all four sessions, the largest number of people registered for the fourth, with over 223 people signing up to attend. Based on the webinar poll responses, most respondents identified as White (50%) or Asian (30%). Slightly under half of respondents were under the age of 50 (48%) while slightly over half were over 50 (52%). Regarding people's connection to San Mateo County, many respondents reported living there (42%), working there (28%), or having an interest in housing issues in the region (26%). A majority have lived in the county for over 21 years (52%) and around two-thirds (67%) own their homes.

Key Themes:

- It is possible for the Bay Area to grow without sprawling into precious open space or exacerbating gentrification
- New infill housing can be accommodated in the county, but different approaches are needed, no one size fits all
- Existing communities have both assets and challenges
- New housing creation could be an opportunity to make better spaces for people
- Cul-de-sac suburbs
    - Assets: detached homes with yards; quiet, spacious character; orientation to (some) family life
    - Challenges: limited connectivity and walkability; one housing type, exclusive; resource-inefficient, hard to service; resistant to change and growth; car-dependent
    - Possible solutions: accessory dwelling units (ADUs), cottage clusters
- Small lot and streetcar suburbs
    - Assets: walkable block and street pattern; mix of housing types; diverse communities; retail and larger lots along corridors; attractive to new residents and builders; good transit access
    - Challenges: scarce and subject to gentrification; small, individually owned lots; resistant to change and growth; somewhat car-dependent
    - Possible solutions: duplexes, bungalow courts, townhomes; small apartment buildings on main streets and downtowns
- Office parks
    - Assets: abundant, underutilized land; large lots under single ownership; flexible and standardized; open to change
    - Challenges: car-dependent; poorly served by transit; isolated and inward-facing;

single-use, with few amenities and services; large paved areas worsen heat and runoff
    - Possible solutions: major redevelopment into mixed-use neighborhoods that include office, retail, housing
- Commercial corridors
    - Can link all of these types with nodes along the corridor
    - Provide larger sites
    - More opportunity for development

21 Elements Engagement

Fair Housing Meeting Summary (September 27, 2021)

MEETING SUMMARY

Countywide Stakeholder Listening Session #1: Fair Housing

9/27/2021, 1-2:30 pm on Zoom

Overview

On September 27, 2021, 21 Elements hosted the first of four housing element stakeholder listening session with several organizations focused on fair housing issues. Presenters, resources and details on what we heard follow.

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 & Programs to consider:

- 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 program to increase access for lower-income people

Stakeholder Presenters & Additional Resources

Organization	Speaker Name	Contact
Center for Independence of Individuals with Disabilities	Benjamin McMullan, Systems Change Advocate	benjaminm@cidsanmateo.org
Community Legal Services of East Palo Alto (CLSEPA)	Michelle Trejo—Saldivar, Law Fellow, Housing Program	mtrejosaldivar@clsepa.org
Housing Equality Law Project	Mary Prem, Executive Director	mprem@housingequality.org
Legal Aid for San Mateo County	Shirley Gibson, Directing Attorney	SGibson@legalaidsmc.org
Project Sentinel	Ann Marquart, Executive Director	AMarquart@housing.org
Housing Choices	Jan Stokley, Executive Director Kalisha Webster, Housing Advocate *(presented at a prior meeting)*	jan@housingchoices.org kalisha@housingchoices.org

Public Interest Law Project	Michael Rawson, Director, (unable to attend)	mrawson@pilpca.org
Root Policy Research AFFH consultant to 21E	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* 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 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.
  - Lack of accessibility requirements for new townhomes were a point of concern.

- **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:**
  - Perform an audit of each jurisdiction 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 need housing (run by HIP Housing?).
  - Look at SB 9 and how it may increase the # of duplexes (will they be accessible?).
  - Identify cities that 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 Engagement

Housing Advocates Meeting Summary (October 18, 2021)

MEETING SUMMARY

Countywide Stakeholder Listening Session #2: Housing Advocates

10/18/2021, 1-2:30 pm on Zoom

Overview

On October 18, 2021, 21 Elements hosted the second of four housing element stakeholder listening sessions with housing advocacy organizations. A majority of 21 E jurisdictions attended the listening session. Five stakeholder advocate groups introduced themselves and spoke about their group's interest in the Housing Element process. Detailed information about speakers and attending jurisdictions is below and in the appendix.

Key themes included:

- Ongoing outreach needed to underserved and diverse communities
- Production of new housing is critical to the SMC workforce
    - Greatest need for deeply affordable housing, dense, infill
- Connecting labor, environment and equity to housing
- Rent increases are a primary concern
- Protecting vulnerable renting populations with assistance from the governments

Policies & Programs to consider:

- Additional funding for affordable housing through commercial linkage fees, inclusionary zoning, vacancy tax, sales tax, etc.
- Protections: eviction assistance, anti-harassment measures, stronger just cause, tenant right-to return, relocation assistance, improvements to the building inspection process, rental registries as a tool
- Production: Increase density within existing communities in non-high fire severity zones, eliminating harmful restrictions on density, eliminating parking minimums, streamlining housing building process, fair and inclusive zoning policies
- Prioritize BIPOC families in housing policies, outreach and practice (all stages of the practices)
- Manage the threat of climate risk by adding green infrastructure.

Stakeholder Presenters & Additional Resources

Organization	Speaker Name	Contact
Housing Leadership Council	Angela Solis	asolis@hlcsmc.org
Faith in Action	Nani Friedman	nani@faithinactionba.org
Greenbelt Alliance	Zoe Siegel	zsiegel@greenbelt.org
San Mateo County Central Labor Council	Rich Hedges	hedghogg@ix.netcom.com
Peninsula for Everyone	Jordan Grimes	jordangrimes@me.com
San Mateo County Association of Realtors	Gina Zari (invited, unable to attend)	gina@samcar.org

Learn more about Greenbelt Alliance's endorsement program: https://www.greenbelt.org/climate-smart-development-endorsement-program/

Learn more about Greenbelt Alliance's Resilience Playbook: https://www.greenbelt.org/resilience-playbook/

Full list of Greenbelt Climate Policies can be found in the draft housing element playbook (under policies tab) https://coda.io/@gazoe-siegel/housing-element-toolkit

For those who wish to learn more about the focus groups in Redwood City that Trinidad from Faith in Action mentioned,, you can read the report here (posted on the City of Redwood City website): https://www.redwoodcity.org/home/showpublisheddocument/23755/637623096709130000

Faith in Action supported with two other reports (tenant protections and preservation), found here: https://www.redwoodcity.org/departments/city-manager/housing-services/housing-policies/anti-displacement-strategic-plan

Note Faith in Action works mostly with renter leaders in Daly City, San Mateo and Redwood City, but they have a presence in several other cities in the county as well.

Jurisdictions in Attendance:

Atherton	Half Moon Bay	San Mateo (City)
Brisbane	Menlo Park	San Mateo (County)
Burlingame	Millbrae	South San Francisco
Daly City	Pacifica	Woodside
East Palo Alto	Redwood City	
Foster City	San Bruno	+HCD

Key Themes and Actions:

Themes

- Ongoing outreach needed to underserved and diverse communities
- Production of new housing is critical to the SMC workforce
    - Greatest need for deeply affordable housing, dense, infill
- Connecting labor, environment and equity to housing
- Rent increases is a primary concern
- Protecting vulnerable renting populations with assistance from the governments
    - Rental registries, eviction assistance, section 8 availability, anti-harassment measures.

Questions/Discussion

- How do you best balance providing adequate living wages for construction workers with keeping housing units affordable?
    - Fair labor is critical to the building process
- Who should operate rental registries (city, county, nonprofit?)
    - Administered by RWC city staff
- Potential policies prioritizing BIPOC
    - Understand needs of BIPOC communities throughout the process
    - Understand displacement policies
    - More housing in transit rich corridors
- Section 8 Vouchers
    - How to increase the availability
- Housing as a benefit to the community/not extracting from it

Appendix: Additional Stakeholder Information & Input

- **Housing Leadership Council: Angela Solis**
  - Network of organizers to support affordable housing
  - Advocating for and preserving affordable housing
  - Greatest need:
    - Deeply affordable homes
    - Focused on funding for affordable homes with example policies:
      - Commercial linkage fees
      - IZ, vacancy tax, sales tax, etc.
  - Seeking greater outreach from jxs for Housing Element process- window into populations

- **Faith in Action Bay Area: Trinidad Villagomez**
  - Focus in Redwood City
  - Community organizers, leaders working in congregations schools, neighborhoods and apartments across SMC to uphold dignity of all people
  - Listening to community experiences with housing (phone calls, door knocking, church involvement, people at food distribution sites)
  - What the group heard from the community:
    - Poor building conditions, harassment, 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

- 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

21 Elements Engagement

Builder Meeting Summary (November 1, 2021)

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

Stakeholder Presenters & Additional Resources

Organization	Speaker Name	Contact
MidPen Housing (Affordable)	Abby Goldware Potluri	agoldware@midpen-housing.org
HIP Housing (Affordable)	Kate Comfort	KComfort@hiphousing.org
BRIDGE Housing (Affordable)	Brad Wiblin	bwiblin@bridgehousing.com
Mercy Housing (Affordable)	William Ho	who@mercyhousing.org
Habitat for Humanity—Greater SF (Affordable)	Maureen Sedonaen	MSedonaen@habitatgsf.org
Eden Housing (Affordable)	Ellen Morris	Ellen.Morris@edenhousing.org
Affirmed Housing (Affordable)	Rob Wilkins	rob@affirmedhousing.com
The Core Companies (Affordable, Market Rate)	Chris Neale	chris@thecorecompanies.com
Sand Hill Property Company (Affordable, Market Rate)	Candice Gonzalez (invited, unable to attend)	cgonzalez@shpco.com
Sares | Regis (Market Rate)	Andrew Hudacek (invited, unable to attend)	ahudacek@srgnc.com
Summerhill Apartment Communities (Market Rate)	Elaine Breeze	ebreeze@shapartments.com
Greystar (Market Rate)	Jonathan Fearn	jonathan.fearn@greystar.com

Jurisdictions in attendance:

Belmont
Burlingame
Daly City
East Palo Alto
Foster City
Half Moon Bay
Menlo Park
Pacifica
Portola Valley
Redwood City
San Bruno
San Mateo (City)
San Mateo (County)
South San Francisco
Woodside

Roundtable Discussion Questions/Answers

Affordable Housing Developers

1. What do you perceive are the primary constraints on affordable housing development?
    - Local funding – esp since state housing laws have helped on the land use side
    - Having funding programs that actually match the supply side/building of the homes
    - Local Funding and Operating Subsidy
    - Current cap in the 9% tax credit round (in last several rounds, not many projects going in because not enough credits in the region) – only projects with fewer than 60 units, plus high costs
    - On preservation side – have to be agile and fast, if cities want to do this, they need to have systems to deal with tight escrow periods
    - Appropriate sites
2. Are long lead (escrow) times possible in the property market today?
    - Sellers are amenable to longer lead times than pre-covid, though Peninsula is still tight
    - What's key is having a good read on public partners' funding commitment
    - For every site where factors line up, you lose a site because other things don't line up
    - You can tie it up to close upon entitlements, but carrying cost adds up, so if public commitment can come in earlier that helps reduce cost
3. What are new policies or improved policies that you think would go farthest to making it easier to develop affordable housing?
    - Local Funding and Operating Subsidy, esp flexible funding
    - 20% setaside dedicated to homeownership programs-
    - Fee waivers
    - Streamlined project timelines on the city's side
    - Consistent, regular NOFA timelines
    - Having all departments aligned on goals
    - Not having extra requirements/costs for affordable housing developments
    - Affordable housing should not bear burden for infrastructure costs
    - Remove restrictive racial covenants
    - More policies like SB 9 and 10
    - Update zoning of sites that were zoned in the 1960s
    - Resources for site analysis, more points awarded when possible to incentivize and also help with by right potentially
4. What would you say are the 3 most important things that jurisdictions can provide in order to facilitate affordable housing development in their jurisdiction?
    - Local Funding and Operating Subsidy
        - Shift unused resources (downpayment assistance for example) to production allocation for more housing or land purchases
        - Nimble funding sources
        - Affordable homeownership
    - Land with appropriate zoning

- Public land, esp in high resource areas (https://belonging.berkeley.edu/2021-tcac-opportunity-map)
- Making more land available with by right zoning or SB35
- Or priority zoning for affordable – San Jose allowing affordable housing to convert industrially zoned land

  - Process
    - Streamlining and alignment across city Departments
    - Dedicated planner to shepherd affordable housing projects
  - I'd like to encourage jurisdictions to think outside the box and find ways to encourage partnerships between for and nonprofit developers. HIP Housing has had several great experience on projects using diverted impact fees and limited partnerships.

5. What should jurisdictions be aware of as they designate sites for affordable housing?
   - Think about how state funding sources/developers are looking at sites. "Vanilla" Aff family is gone unless in high resource areas so need operating subsidy. Sites need to be in amenity rich area (put site through amenity scoring lens)
   - Operating subsidies needed to support the deeper affordability that is sought today
   - Layering of requirements and compatibility of different populations
   - Think about not just # of units but also # of people being served
   - A comprehensive view of constraints, impacts of delays on developers
   - Be prepared for pushback in high resource areas
   - We need more ownership, multifamily sites should be funded and counted by # of people served, not just # of doors; make residential "only" or limit commercial so can residential compete
6. Most of the Cities I consult for are small and do not have the capacity or expertise to shepherd affordable projects. What can you recommend otherwise?
   - Important who the city chooses to partner with. Experienced developers can do some education on that. Hire a consultant or someone who can help to navigate the process
   - Small cities are sometimes great because they don't have as much bureaucracy and can get things done more quickly
   - Smaller cities could look to partner with Developers who build under 20 units (like Habitat and others on this call) and we welcome the opportunity to learn together. P.S. It's hard to make it work financially if there are under 6 units however:)
7. What is your experience with rolling NOFAs (no deadline) versus NOFAs that have a fixed deadline for responses? Are there particular advantages or disadvantages to either one of these?
   - Affordable developers rely on consistent, regular process
   - Don't create a land rush and have affordable developers bid up land
   - Like rolling deadlines, since in the preservation world, can't wait until a NOFA
   - No deadlines better align with development
   - Rolling NOFA's are good, allow for flexibility to be responsive
   - If you really need to schedule it, make sure NOFA schedules coincide with other funding sources

8. Would you have advice for jurisdictions with a lot of environmental constraints that can make housing expensive--faults, steep slopes, limited sewer, fire hazard, etc.?
    - Often they aren't as bad as you might initially think. A second look can make something workable
    - All the easy land has been developed on already! So don't hold back, this is the norm, not the exception
    - There are sometimes sources for brownfield funding
9. What is the densities that are working best for 100% affordable projects that cities should be planning for in the Housing Element process?
    - Anything over 20 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

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

- 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

21 Elements Engagement

Service Provider Meeting Summary (November 15, 2021)

MEETING SUMMARY

Countywide Stakeholder Listening Session #4: Service Providers

11/15/2021, 1-2:30 pm on Zoom

Overview

On November 15, 2021, 21 Elements hosted the fourth of four housing element stakeholder listening sessions with San Mateo County service providers. Detailed information about speakers (see appendix for organizational information) and attending jurisdictions is below.

Key themes included:

- Key location characteristics were similar for most groups: access to transit, groceries, medical services, pharmacy, schools/parks/community centers/senior centers, jobs and job training.
- Most of these stakeholder groups serve people with a range of incomes – focused primarily at the low end of the income spectrum but also into moderate levels.
- Need affordable housing (or access to vouchers/subsidies that help with access to market-rate housing) of all shapes and sizes: mostly smaller units (studios to 2BR) but there is a need for larger units. It is hard for larger families (5-8 people) to find appropriately sized housing. Space, closets and storage, design for people with disabilities. *See below for details.*
- Some people need onsite supportive services; others just need to be able to easily access services, whether by transit or if it can come to them.
- Work with service providers and people experiencing issues firsthand before creating programs.
- Use your networks and power to encourage business/tech/philanthropy to support service providers

Policies & Programs to consider:

- Actively partner with affordable housing developers to streamline and facilitate development
- Stabilize market rents
- Use public land for affordable housing
- Create more workforce housing.
- Increase inclusionary housing
- Encourage and facilitate more homesharing
- Educate landlords on their rights so they are more willing to partner with Housing First service providers

Stakeholder Presenters & Additional Resources

Organization	Speaker Name	Contact
Daly City Partnership (one of San Mateo County's Core Agencies)	Marya Ouro-Gbeleou	marya@dcpartnership.org
HIP Housing	Laura Moya	lmoya@hiphousing.org
LifeMoves	Jacob Stone	jstone@lifemoves.org
Mental Health Association of San Mateo County	Melissa Platte	melissap@mhasmc.org
National Alliance on Mental Illness	Michael Lim	michael@namisanmateo.org
Ombudsman of San Mateo County	Bernadette Mellott	berniemellott@ossmc.org
Samaritan House San Mateo (one of San Mateo County's Core Agencies)	C. LaTrice Taylor	latrice@samaritanhousesanmateo.org
Youth Leadership Institute	Alheli Cuenca	acuenca@yli.org
Abode Services	Jeremiah Williams (unable to participate live, interviewed)	jwilliams@abodeservices.org
El Concilio	Gloria Flores-Garcia (unable to participate live)	gfgarcia@el-concilio.com

Roundtable Discussion Questions/Answers

1. We assume that transit-oriented or transit accessible housing is important. Are there any other location characteristics that you would highlight are important for the people you serve?
    - 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

- Abode – varies. Have some unique programs, sometimes relocate people out of the county. Medical, schools, childcare, transportation. Access to jobs/job training

2. What is the range of income levels of the population you serve?
    - Mental Health Association - 0 to 15%
    - LifeMoves – range from 0 to 100%
    - Daly City Partnership – weighted to the lower end 0 to 30, 0 to 50%, a lot at 80% too but not as many
    - National Alliance on Mental Illness – lower end, but mental illness spans people across the whole income spectrum
    - Abode – serve the lowest incomes

3. What role does market-rate housing play for the people you serve? Are vouchers helping?
    - Mental Health Association – for most clients, market-rate housing is out of reach, even affordable is also often out of reach (since it serves 40% to 120% AMI)
    - Ombudsman – her clients in assisted living get a $1500 check, rent is $5000+, sometimes families or retirement funds make it work. Now facing a number of families who cannot help anymore because of lost jobs during the pandemic. 15 people on evictions list right now, many are 85+ years. If they are evicted they will end up on the streets. Looking for solutions for them. They don't take transportation, they can't
    - HIP Housing – 95% of clients in homesharing program are at or below 80% of AMI, sometimes not low enough to access affordable housing. And some are on fixed income and don't qualify for affordable housing and don't make enough to access homesharing program. Waiting lists are way too long
    - Daly City Partnership – see a lot of same types of people that Ombudsman sees, just a few years earlier, before they need assisted living. It's a tough spot to be aging in San Mateo County, unless you're healthy or living with your adult children. Think about dignity for our older folks. We need to care for our elders.
    - Abode – do master leases, use vouchers, so existing and new market-rate housing plays an important role. Develop relationships with landlords that accept vouchers (provide case mgt/contact for landlords, help to avoid evictions). Important to educate landlords around their rights, not a lot of legal services available to them. Work with a range of landlord and building types.

4. Do affordable units need to be designed in a certain way or certain size to meet the needs of the people you serve?
    - Mental Health Association – definitely need more units that are available for people with physical disabilities. Serve people with serious mental illness, HIV/AIDS debilitating conditions, etc. It used to be that they would die far younger than most, but now people are now living into 60s-70s-80s. This is great but long-term effects of medications have impact on their bodies, put them at greater risk for falls, etc. Mostly studios and 1BRs (preferred), closets and storage in the unit are critical
    - Youth Leadership Institute – serve young people – in Half Moon Bay they are seeing 3 HH living in one unit, looking to advocate for pathway to homeownership, also single family housing (3BR/2BA). Want as much space as possible, spacious living areas.

During pandemic school from home was incredibly challenging esp when community centers weren't open or limited. Also like ADA accessible, parking spaces, access to community parks, trails, since there are not a lot of things for young people to do; storage units and closets, public bathrooms in developments

- HIP Housing – serve single individuals, families and seniors. Larger families get missed, families of 5-8 or larger can't find any affordable housing options. Some seniors would benefit from onsite services, during pandemic especially suffered from isolation
- LifeMoves – serving more seniors every year, medically fragile folks – in terms of families serve primarily smaller households of 2-3, but do have a few large HH too
- National Alliance on Mental Illness – agree with many things mentioned above, add better noise insulation since clients may have experienced trauma and loud levels of noise can trigger them to the next episode
- Abode – need all types of units

5. For the population you serve, if the cities were able to encourage a set-aside within affordable housing for special needs, who needs onsite supportive services? Who can live in general affordable housing (assuming deeper levels of affordability)?
    - Mental Health Association – only 30% of people we serve need to have site-based services onsite, but 100% of clients need access to support services. Deep affordability/subsidies/vouchers can work as long as there are services that can be brought in to work with them
    - National Alliance on Mental Illness – some of our clients may lose custody of their children or have shared custody. Studio will suffice for most but for some who are working to get their life back in order, helps to have a little bit more space when they have their children visit
    - Daly City Partnership – Was able to tour Sweeney Lane (MidPen Housing) in Daly City – wonderful onsite services. Was moved, this is what our people need, it's a shame that it is so small. Excellent example of good practice of surveying residents about their needs and evolved services as needed. Many clients don't need that level though. Echo importance of evolving services over time. Midway Village in Daly City – for several years there weren't onsite services, people there for generations, underserved population historically. Some of the seniors today moved there when they were young – we need to think about aging in place, be thoughtful over the long term about evolving resident needs. There is a need for large units (4 children) in the market even though the smaller households are most common. # of kids is a limiting factor on affordable applications
    - Ombudsman – there is no affordable assisted living. Pipe dream is that some people might be able to live in affordable housing with their families if they had some onsite services. Some need their medications to be given to them. Physical therapy is provided in nursing homes. Cheapest assisted living is $4500, ranges up to $10K/mo. Seniors need the same basic services no matter their income. Also serve mentally and physically disabled in residential homes. Nobody wants them, which is very sad.

6. Aside from more money, what can jurisdictions do to be helpful? Future programs and policies not just about the direct allocation of money

- Daly City Partnership – Sweeney Lane is an example of the city getting behind a development and working collaboratively to get everything together – zoning, permitting, convincing adjoining land owner with lot to sell the lot. Worked to move things as quickly as possible. It takes such a long time to make these projects happen, which is a problem when people are homeless *today*
- HIP Housing – one of the things jurisdictions can do is encourage and support affordable and accessible prices in the overall housing market. More supportive services for mental health issues, esp at earlier stages. More supportive services to people on fixed income, make sure they don't lose fixed income if they get access to new resources. Jurisdictions may not recognize homesharing as a solution, but they should consider it, it is readily available, no cost, can help fill in the gaps
- Mental Health Association – agree with everything that has been said. Use city and county owned property for low income housing. Support developers that include extremely low income units, that provide support services onsite or accessible. There's a lot of talk about teacher housing – nonprofit staff need affordable housing too. Would help to recruit and retain employees, who we are losing every day. If we can't hire staff, we will not be able to serve
- Ombudsman – all the market-rate developers who are building these beautiful residential buildings, but only put 3 low income units in 25 unit building. We should incentivize them to add more low-income units. Give the developer a tax credit to incentivize them to increase the # of low income units. Get more people off the streets and into nice apartments.
- National Alliance on Mental Illness – incentives to builders is great. Also think about how to halt the exchange of ownership on property. Every time land is sold and changes hands, it becomes more expensive. Think more creatively about ownership of land
- Abode – Besides more money, we need more vouchers, more staff. More project-based housing. Education for landlords on their rights will help more landlords be willing to take vouchers, sign master leases. Rapid rehousing is needed but it doesn't work for everyone; we need more permanent supportive housing. Jurisdictions should reach out to people at ground level for input before creating programs.

7. Are there options for people that have animals?
    - Mental Health Association - Most of our clients can have an animal as long as we work with them to request a reasonable accommodation. 100% of our units can and will make the accommodation.
    - National Alliance on Mental Illness – pets are huge thing for our clients, not only with soothing them but also creating a sense of responsibility, gives them second thoughts when they are thinking of ending their lives
    - HIP Housing – it is still a big barrier in affordable housing when their pet is not a service or supportive animal. Many people have more than one pet which is also a barrier.

8. How much have the large companies--Apple, Facebook, YouTube, etc--stepped up to help provide money for these services and housing units?
    - Mental Health Association - To our knowledge, not much.
    - Ombudsman – got turned down for grants from FB, Google, Genentech
    - Samaritan House – they do fund some things, some of the folks here do have funding, depends on the focus, housing, food, youth has been big. Need to understand what is it that they really want to fund and tailor what you're doing to what they're asking for
    - Daly City Partnership – CZI is funding all of the Core Agencies in SMC, doing a lot of work around free, high-quality training for their grantees and others. They are at the forefront. Key to support for Core Agencies: someone at County advocated for the Core Agencies. Jurisdictions, use your network and political power to help orgs
    - HIP Housing – has benefited from CZI as well

9. Additional comments
    - Samaritan House – article came out today about most expensive zip codes in the country. For the 5th year in a row: Atherton. In the Bay Area we have 47 out of 100 zip codes that are among the highest in the country. In SMC, 10 of the 47. Somehow, some way we need to figure out how to solve this with partners, with developers (who have codes to follow, does tax credit offset how much they can make, when it's more about the money and those who can afford it vs. police, firemen, nonprofit workers). We are fast approaching that cliff where we're not only pricing out our clients but also the middle class. We need to do something, not sure what it is. We've got a fire. Where are the hoses, where is the water, where are the fire trucks? Tech companies should be a part of this process. We need the people with the money at the table. The tech companies are contracting with people so they don't have to pay benefits. People are working from other parts of the state/country because their money doesn't go as far in the Bay Area. $140K income for a family of 4 only covers the basics. I know the people who are here know that. But who else do we need at the table to know it too.
    - Daly City Partnership - One of my favorite quotes, "Tell the rich of the midnight sighing of the poor." We need to educate the upper-class and business folks - appeal to their conscience. But that is my own personal view. LaTrice (Samaritan House) is so right.
    - National Alliance on Mental Illness – Need to look at transportation, exploring localities that are hubs. In a few years (or even now) we are facing the challenges of our own existence. NAMI San Mateo had to give up its permanent site and move offsite. Current location is not ideal, not close to any public transportation system. El Camino is going to look like two walls of buildings with homes. Is that what we want or do we want to add transit to allow people access to services. Jurisdictions should start thinking about transportation hubs. Think about housing density and building up because limited land, is precious. Need to think about it now since it takes time to build infrastructure

Appendix: Additional Stakeholder Information

Human Investment Project (HIP Housing)

- Mission: HIP Housing's Mission is to invest in human potential by improving the housing and lives of people in our community. HIP Housing enables people with special needs, either from income or circumstance, to live independent, self-sufficient lives in decent, safe, low-cost homes. To achieve our mission, HIP Housing provides Home Sharing, Self-Sufficiency, and Property Development.
- Where you operate: All cities in San Mateo County
- Whom you serve: Families and Individuals who live, work, go to school or have a housing voucher in San Mateo County.

LifeMoves

- Mission: To provide interim housing and supportive services for homeless families, couples and individuals to rapidly return to stable housing and achieve long-term self-sufficiency.
- Where you operate: Countywide, Daly City to East Palo Alto and Half Moon Bay on the coast
- Whom you serve: families, couples and individuals experiencing homelessness

Mental Health Association of San Mateo County

- Mission: Mental Health Association of San Mateo County is dedicated to improving and enriching the quality of life for individuals in our community who have a mental illness, HIV or AIDS or a co-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.

- 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

COMMUNITY SURVEY

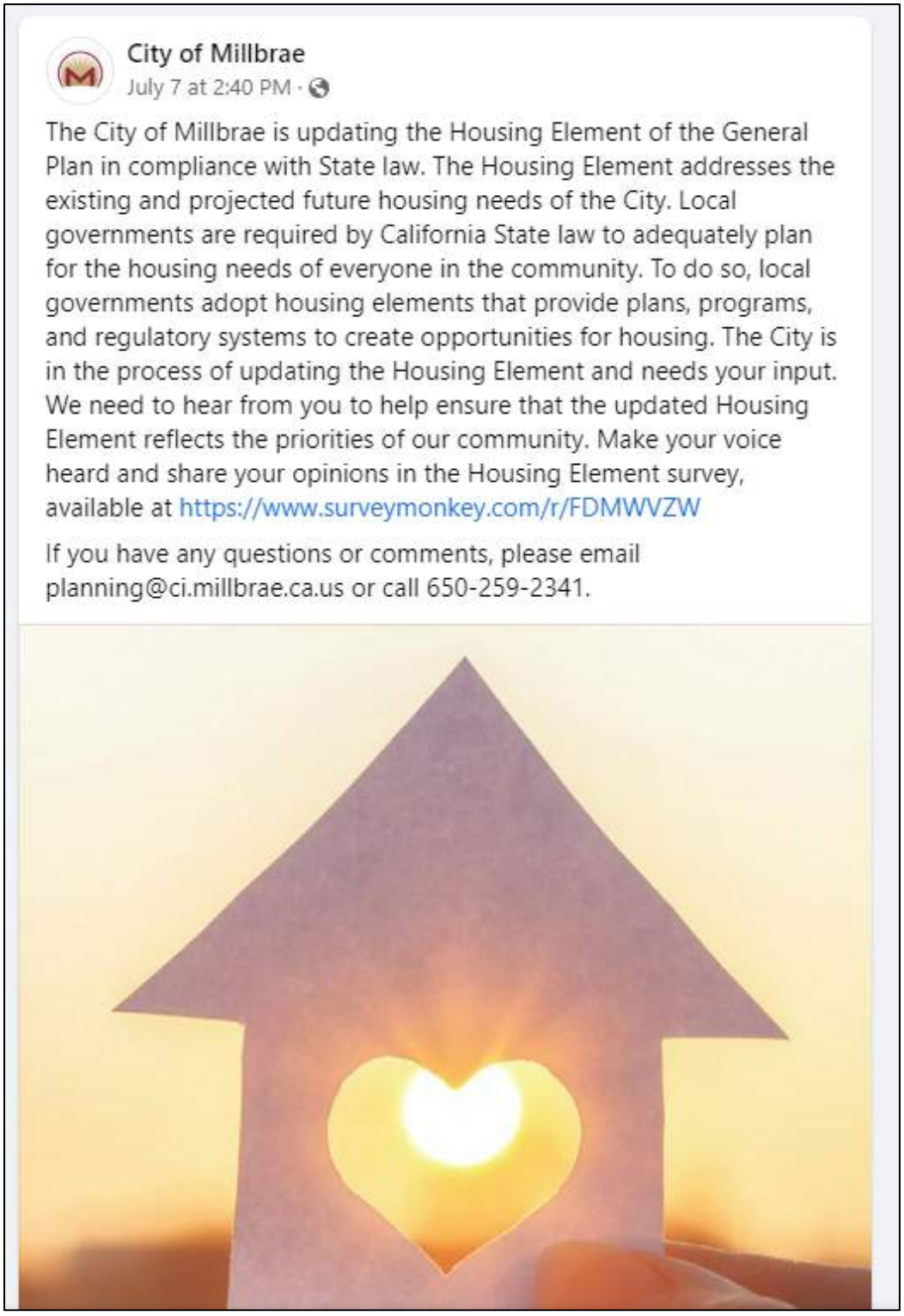
- Notices
- Community Survey (Blank)
- Community Survey Results Summary

Community Survey

Notices

City of Millbrae – Housing Element Update Community Survey Social Media Posts

Facebook - https://www.facebook.com/cityofmillbrae



Twitter -
https://twitter.com/CityofMillbrae/status/1545160740558049281?cxt=HHwWgsC83bjgwfEqAAAA

Instagram - https://www.instagram.com/cityofmillbrae/?hl=en

Housing Element Update

What is a Housing Element?

The Housing Element is a core element of the City's General Plan. The General Plan is a long-range plan that guides decision- making and establishes rules and standards for new development and city improvements. It reflects the community vision for the future and is intended to provide direction through the year 2040.

The key components of the Housing Element include:

- A community demographic profile and analysis of population growth and trends.
- A list of available land suitable for housing development.
- An evaluation of local constraints or barriers to housing development as well as opportunities to develop housing.
- Housing goals, programs, policies, and resources for improving and creating housing within the City.

What is the Process?

The City of Millbrae initiated work on the 2023-2031 Housing Element of the General Plan to address the existing and projected future housing needs of the City. Local governments are required by California State law to adequately plan for the housing needs of everyone in the community. To do so, local governments adopt housing elements that provide plans, programs, and regulatory systems to create opportunities for housing.

This update is for the 6th Cycle Housing Element which will cover the eight-year planning period from 2023-2031 for the City. The previous 5th Cycle Housing Element covers the planning period from 2015 - 2023.

Get involved and make your voice heard

We need to hear from you to help ensure that the updated Housing Element reflects the priorities of our community. There are several ways to make your voice heard:

- Share your opinions in the Housing Element survey, available here.
- The City held a virtual public workshop on Thursday, June 30, 2022. The workshop introduced the element, presented a community profile, include live polling on housing needs, challenges, and issues, and staff received input on potential policies and programs. The presentation slides can be viewed here.
- If you would like to sign up for updates, please email nguevara@ci.millbrae.ca.us to be added to our interest list.
- After the draft Housing Element is prepared, there will be opportunities to comment on the draft document and attend public hearings for adoption.

Housing Element FAQs

Why update the Housing Element?

California State law requires that local jurisdictions update the Housing Element every eight years. These frequent updates are required because housing is critical to ensure economic prosperity and quality of life in our region. This Housing Element update is an opportunity to evaluate the previous element and determine which parts have been effective and which should be improved. It also provides an opportunity for residents to get involved and help determine housing priorities, thereby helping to ensure that the City is responding to residents' changing needs.

The updated Housing Element must be adopted by the Millbrae City Council and submitted to the State Department of Housing and Community Development no later than January 31, 2023. If this deadline is missed, Millbrae could lose eligibility for significant sources of funding currently provided by the State and the Association of Bay Area Governments (ABAG), including critical infrastructure and transportation funds.

Community Survey

Community Survey (Blank)

City of Millbrae Housing Element Update Survey

Housing Element Information

California State law requires local governments to have a general plan, a blueprint for meeting the community's long-term vision for the future. The General Plan contains several chapters or "elements," covering different topics. One of these is the housing element. State law requires local governments to adequately plan for the housing needs of everyone in the community by adopting housing elements that identify plans, programs, and potential changes to regulatory systems to create opportunities for housing. The housing elements must be updated every eight years.

The Housing Element is how the City of Millbrae plans to meet the existing and future housing needs for its residents of all income levels. It is a core element of the City's General Plan and includes goals, policies, programs, and strategies to accommodate the City's housing growth, provide opportunities for new housing, preserve the existing housing stock, and promote housing affordability and fairness.

The City is in the process of updating the Housing Element and needs your input!

If you live, work, or own property in the City of Millbrae, please complete the following survey. Your thoughts and experiences will help identify important housing needs for everyone in Millbrae

and will help the community. Thank you in advance for your participation. Please complete only one (1) response per person for the survey.

1. ***We'll start with some identifying questions. These will help to identify that we are reaching a broad swath of stakeholders with the survey.***

Do you live and/or work in the City of Millbrae?

- ◯ I live in Millbrae but work somewhere else
- ◯ I work in Millbrae but live somewhere else
- ◯ I live and work in Millbrae
- ◯ I live in Millbrae and do not currently work/I am retired

2. If you live in Millbrae, how long have you lived in the City?

- ◯ 0-2 years
- ◯ 2-5 years
- ◯ 5-10 years
- ◯ 10+ years
- ◯ I do not live in Millbrae

3. If you live in the City of Millbrae, why have you chosen to live in the City? (Select all that apply)

- [ ] Close to job/work
- [ ] Quality of housing units
- [ ] Recreation, parks and/or scenery
- [ ] Close to family and/or friends
- [ ] It's affordable
- [ ] Quality of schools
- [ ] Quality of neighborhood
- [ ] Quality of City services and programs
- [ ] Close to shopping and services
- [ ] I do not live in Millbrae
- [ ] Other (please specify)

4. If you currently work outside of your home or worked outside of your home prior to the COVID-19 pandemic, about how long is/was your commute to work one-way?

- ◯ Less than 5 miles
- ◯ 5-10 miles
- ◯ 10-25 miles
- ◯ 25-40 miles

- ◯ More than 40 miles

5. My current housing unit is a/an (Select One):

- ◯ Single Family Unit (Detached)
- ◯ Duplex (2 units in 1 building)/Attached Unit
- ◯ Triplex (3 units in 1 building)/Attached Unit
- ◯ Apartment/Condominium Unit
- ◯ Other - please specify (e.g. Accessory Dwelling Unit)

6. Which of the following applies to you? (Select all that apply)

- ☐ I rent in the City of Millbrae
- ☐ I own a housing unit that I live in within the City of Millbrae
- ☐ I own residential rental property in the City of Millbrae
- ☐ Other (please specify)

7. What age range most accurately describes you?

- ◯ 18-21 years old

- ◯ 22-30 years old
- ◯ 31-40 years old
- ◯ 41-50 years old
- ◯ 51-60 years old
- ◯ 60 + years old

8. Please identify the neighborhood in which you live.

- ◯ Mills Estates
- ◯ Bayside Manor
- ◯ Green Hills
- ◯ Airport Park
- ◯ Millbrae Highlands
- ◯ Glenview Highlands
- ◯ Manor #1
- ◯ Downtown Millbrae
- ◯ Millbrae Meadows
- ◯ Capuchino
- ◯ Telescope Hills
- ◯ Marina Vista
- ◯ Meadow Glen

- ◯ Lomita Hills
- ◯ Other

9. ***Now we will ask some questions about housing and neighborhood conditions. These will help to paint a picture of current conditions in the City and to identify needs.***

Do you feel that there are areas of concentration of any particular ethnic group in your neighborhood or in the City?

- ◯ Yes, in the City
- ◯ Yes, in my neighborhood only
- ◯ Yes, in both my neighborhood and in other parts of the City
- ◯ No, in neither

10. If you answered Yes to Question 9, what ethnic groups (select all that apply)?

- ☐ White
- ☐ Asian
- ☐ Black or African American
- ☐ Native Hawaiian and Other Pacific Islander
- ☐ Hispanic/Latino

- [ ] American Indian and Alaska Native
- [ ] Other (please specify)

11. Are you satisfied with your current housing situation?

- ◯ Yes
- ◯ No
- ◯ Other (please specify)

12. How would you rate the physical condition of the unit you live in?

- ◯ Excellent condition
- ◯ Needs some minor maintenance (i.e., peeling paint, chipped stucco, leaky windows, etc.)
- ◯ Needs one or more modest rehabilitation improvements (i.e., roof repairs, broken cabinets, carpet/tile replacement from wear, older plumbing or electrical systems, older heating or air conditioning systems, new window, etc.)
- ◯ Needs one or more major upgrades (i.e., new foundation, replacement of plumbing or electrical systems, replacement of heating or air conditioning systems,new roof, new exterior siding, etc.)

◯ Other (please specify)

13. What are the three most important factors to you in choosing your current housing unit (select only the three most important)?

- ☐ Cost
- ☐ Close to childcare
- ☐ Close to public transportation/transit stops
- ☐ Close to essential services (libraries, banks, doctor's offices, etc.)
- ☐ Close to work or other job opportunities
- ☐ Close to parks and recreation areas
- ☐ Close to restaurants, entertainment, and/or shopping
- ☐ Close to quality public schools
- ☐ Low crime rate
- ☐ Number of bedrooms
- ☐ Landlord accepts Section 8 housing vouchers
- ☐ Landlord accepts pets
- ☐ Walkability
- ☐ Large yard

- [ ] Adequate space
- [ ] Racial/ethnic diversity of the neighborhood

14. Do the housing options in the City of Millbrae meet your needs?

- ◯ Yes
- ◯ No

15. If you don't own a housing unit in Millbrae (but want to buy one) it is because (Choose all that apply)

- [ ] I can't find a housing unit in my price range in Millbrae
- [ ] I can't find a housing unit that suits my living needs in Millbrae (housing size, disability accommodations)
- [ ] I don't have the financial resources for a down payment
- [ ] I don't have the financial resources for a monthly mortgage payment
- [ ] I can't find a housing unit that meets my quality standards in Millbrae
- [ ] N/A - I don't wish to own a housing unit e in Millbrae (I prefer to rent or live outside of Millbrae)

16. As a City resident, what do you feel is the biggest housing problems in Millbrae? Choose top two only

housing problems in Millbrae? Choose top two only.

- [ ] Not enough housing units for sale
- [ ] Not enough housing units for rent
- [ ] Housing is not affordable
- [ ] Housing size does not meet my family needs (e.g., not enough 3+ bedroom units at affordable prices, or not enough studio or small options)
- [ ] Housing is not located in the right places (e.g. near transit stops, schools, hospitals, jobs, etc.)
- [ ] The conditions of neighborhoods (streetlights, sidewalks, parks) are poor
- [ ] Housing conditions are poor
- [ ] Other (please specify)

17. What types of housing are most needed in the City of Millbrae (select all that apply)?

- [ ] Single Family (Detached) Unit
- [ ] Duplex/Attached Housing Units
- [ ] Condominiums or Townhomes (multifamily ownership homes)
- [ ] Apartments (multifamily rental homes)
- [ ] Dedicated Senior Units

- [ ] Affordable Housing Units
- [ ] Housing for persons with disabilities
- [ ] Transitional or supportive housing
- [ ] Emergency Shelters
- [ ] Other (please specify)

18. What do you think can be done to address the housing problems and needs you identified in the prior two questions?

19. ***Next, we will ask about public policy concerns and what you consider to be the most important programs for the City to focus on, including potential concerns about fair housing.***

Do you think there are factors that prevent affordable housing from being built in the community?

- ◯ Yes
- ◯ No
- ◯ What do you think can be done to address these barriers?

(please specify)

20. How important are the following concerns to you and your family? (Check one box per line in the table below)

	Very Important	Somewhat Important	Not Important	Don't Know
Access to affordable childcare	☐	☐	☐	☐
Increased City services for residents with disabilities	☐	☐	☐	☐
Rental assistance for low income residents, the unemployed, and the underemployed	☐	☐	☐	☐
Programs to improve environmental conditions and reduce health hazards	☐	☐	☐	☐
Children who grow up in Millbrae should be able to afford to live in Millbrae.	☐	☐	☐	☐

	Very Important	Somewhat Important	Not Important	Don't Know
Residents who have made Millbrae their home should not be displaced as housing costs increase	☐	☐	☐	☐
There is a need to create mixed-use (commercial/ office and residential) projects in the community where residents can walk to work and services so there is less driving	☐	☐	☐	☐
The housing market in Millbrae should have many types of housing, including single-family homes, townhomes, apartments, and condominiums to meet the varied needs of local residents.	☐	☐	☐	☐

	Very Important	Somewhat Important	Not Important	Don't Know
Establish special needs housing for seniors, large families, and/or persons with disabilities	☐	☐	☐	☐
Integrate affordable housing throughout the community to create mixed-income neighborhoods.	☐	☐	☐	☐
Encourage energy conservation through site and building design.	☐	☐	☐	☐
Provide shelters and transitional housing for the homeless, along with services to help move people into permanent housing.	☐	☐	☐	☐
Encourage the rehabilitation of existing housing stock in older neighborhoods.	☐	☐	☐	☐

	Very Important	Somewhat Important	Not Important	Don't Know
Establish programs to help at-risk homeowners keep their homes, including mortgage loan programs.	☐	☐	☐	☐
Fair/Equitable Housing opportunities and programs to help maintain and secure neighborhoods that have suffered foreclosures.	☐	☐	☐	☐

21. What types of programs or activities do you believe the City should concentrate on over the next eight years? Select your top 3 recommendations:

- ☐ Promote fair housing services to address fraud, displacement, or discrimination
- ☐ Assist residents with housing costs
- ☐ Encourage housing near transit
- ☐ Allow for greater density at existing housing developments
- ☐ Encourage innovative design with emphasis on community and amenities

- [ ] Help prospective residents find available housing
- [ ] Promote mixed-use development with both commercial and residential components
- [ ] Focus on transitional, supportive, or other emergency housing types
- [ ] Focus efforts on rehabilitation of existing housing
- [ ] Provide incentives for developments that include low-income or affordable units
- [ ] Streamline permit processes for housing projects
- [ ] Other (please specify)

22. Do you or someone in your household experience difficulties accessing services due to language barriers?

- ◯ Yes
- ◯ No

23. Do you feel burdened by pollution or noise in the City? If yes, please identify a source or area of concentration of pollution or noise.

- [ ] Yes
- [ ] No

☐ If yes, please identify a source or area of concentration of pollution or noise.

24. Have you experienced discrimination as a resident of Millbrae in the realm of housing based on a protected class (age, familial status, gender, marital status, mental disability, national origin, physical disability, race, religion, source of income, student status, or sexual orientation)?

◯ Yes

◯ No

25. If you have experienced discrimination in the realm of housing, what protected class was it based on?

◯ Age

◯ Familial status

◯ Gender

◯ Marital status

◯ Mental disability

◯ National origin

◯ Physical disability

◯ Race

- ◯ Religion
- ◯ Source of income
- ◯ Student status
- ◯ Sexual orientation

26. Have you sought fair housing services from the City or one of their partners: Legal Aid Society of San Mateo County, Project Sentinel, Community Legal Services of East Palo Alto, or Peninsula Conflict Resolution Center?

- ◯ Yes
- ◯ No

27. Do you think the City and its partners provide adequate fair housing services?

- ◯ Yes
- ◯ No

28. Please rank the following groups by order of their need for housing and related services in the community. 1= greatest need and 5 = least need

- ☰ ☐ Seniors
- ☰ ☐ Large families (five or more members)
- ☰ ☐ Persons with disabilities

- [ ] Young adults
- [ ] Persons experiencing homelessness

29. Do you fear being displaced out of your community as a result of high housing costs, new developments, or gentrification?

30. Have you or anyone you know in the City had to move between 2015 and now due to high housing costs?

31. Please show your support for the following potential housing strategies for your community in ranking order, with 1 representing the strongest support and 5 representing the least support:

- [ ] Facilitate the development of Accessory Dwelling Units.
- [ ] Allow for construction of micro-units (smaller housing units).
- [ ] Change zoning regulations to allow for higher density and taller housing
- [ ] Rezone commercial sites to residential zoning to allow for more housing.

☐ Allow for the subdivision of single family lots to allow for more units

32. How important is it to you that new housing is located within walking or short biking distance to the following?

	Very Important	Somewhat Important	Not Important
Childcare	○	○	○
Grocery store	○	○	○
Businesses Millbrae residents use regularly	○	○	○
Park, Recreation Center, playground, fields, etc.	○	○	○
School	○	○	○
Religious Institution	○	○	○
Entertainment, restaurants, etc.	○	○	○
Medical facilities	○	○	○
Transit stop	○	○	○
Bicycle facility (bike lane, trail, path, etc.)	○	○	○

33. ***Finally, we welcome any other comments you have about the Housing Element, and we invite you to provide your contact information if you would like to sign up for updates and information on the Housing Element Update.***

Are there any comments you would like to share with the City of Millbrae regarding the Housing Element Update?

34. Please leave your name and email address to receive updates and information on the 2023-2031 Housing Element Update. (optional)

Done

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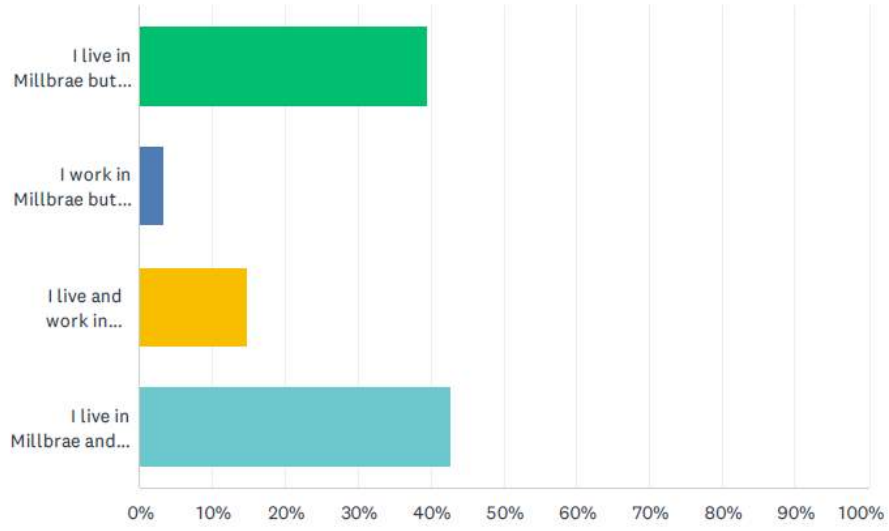
Community Survey

Community Survey Results Summary

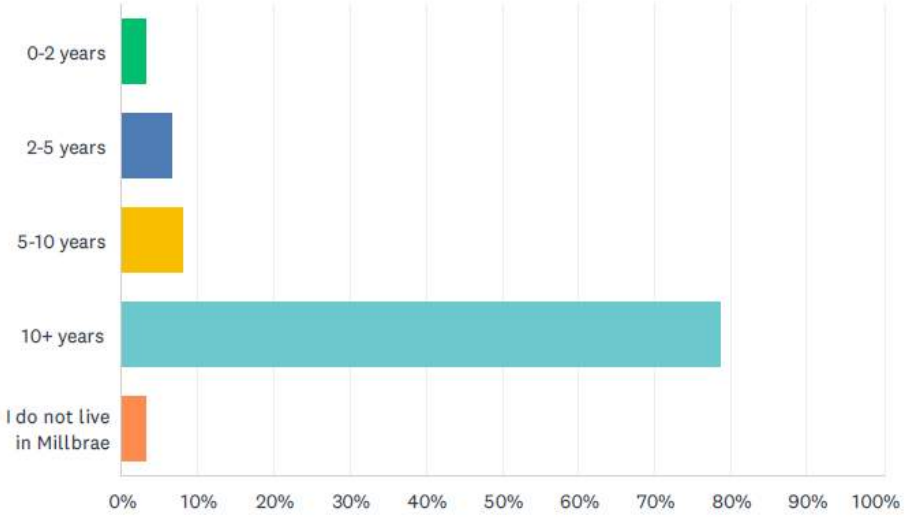
MILLBRAE HOUSING SURVEY RESULTS

The City of Millbrae (City or Millbrae) conducted a community survey to assess housing conditions as experienced by residents, as well as gather their feedback. The Survey was published on (insert date) and received (how many responses) responses by (date survey closed). The following summary encompasses the results of these (number) responses:

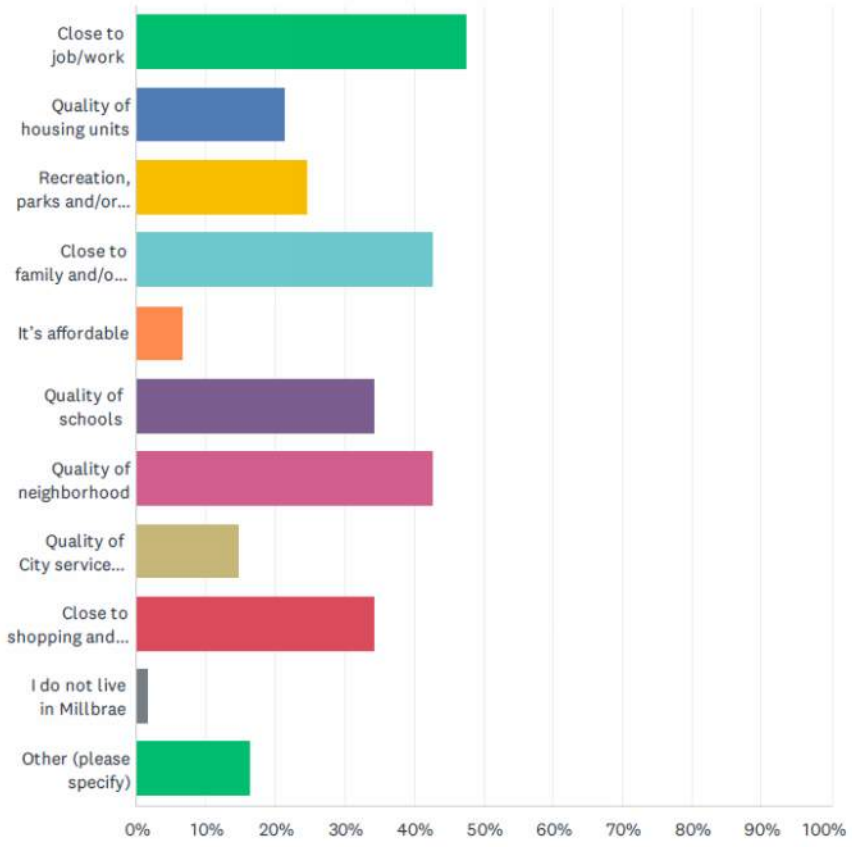
1. Do you live and/or work in the City of Millbrae?



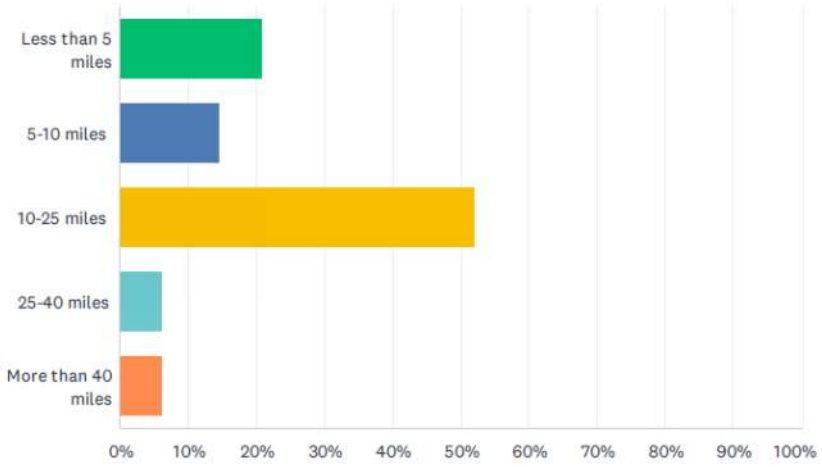
2. If you live in Millbrae, how long have you lived in the City?



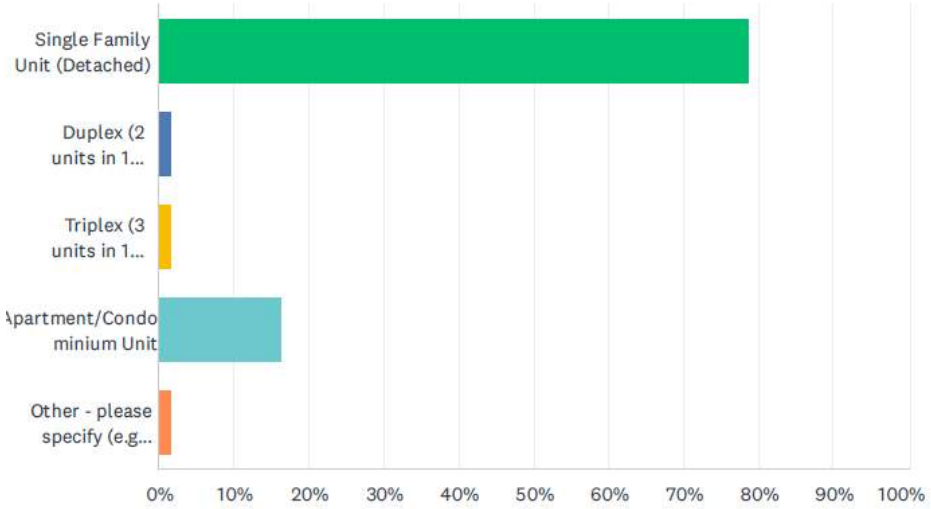
3. If you live in the City of Millbrae, why have you chosen to live in the City? (select all that apply)



4. If you currently work outside of your home or worked outside of your home prior to the COVID-19 pandemic, about how long is/was your commute to work one-way?

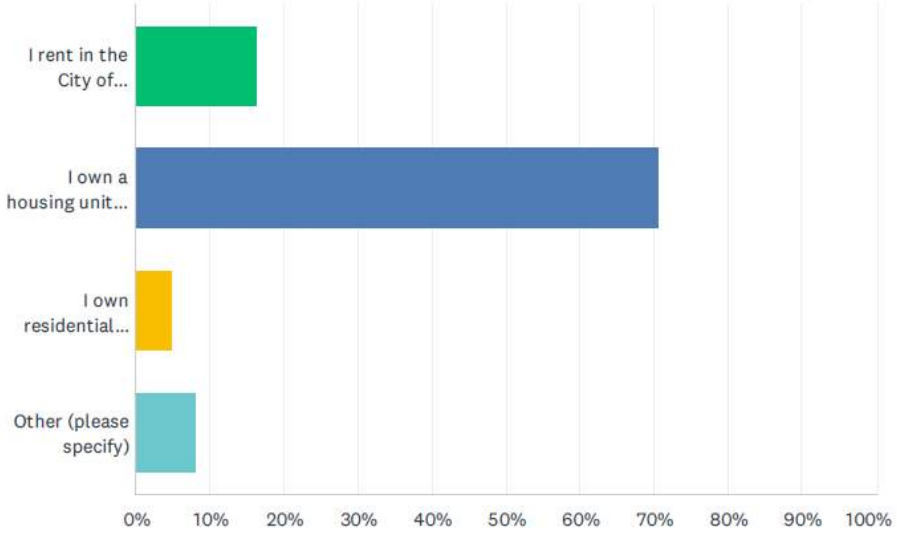


5. My current housing unit is a/an (Select One)



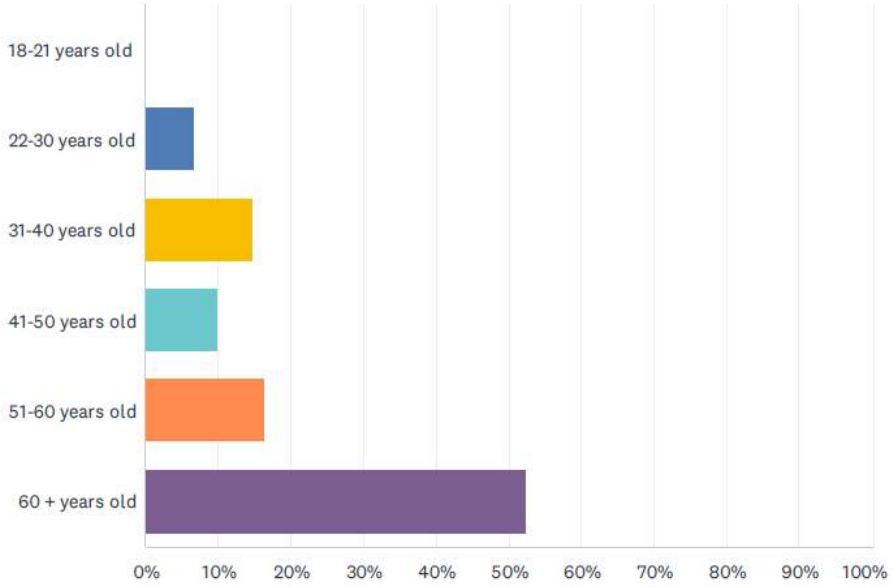
WRITE IN ANSWER RESPONSE: OTHER, PLEASE SPECIFY	
1.	Own my house

6. Which of the following applies to you? (select all that apply)



WRITE IN ANSWER RESPONSE: OTHER, PLEASE SPECIFY	
1.	I will inherit the house I grew up in and I came back to Millbrae to care for elderly parents
2.	I do not own property in Millbrae but am a member of the local economy
3.	Own my house
4.	Care takers to seniors

7. What age range most accurately describes you?

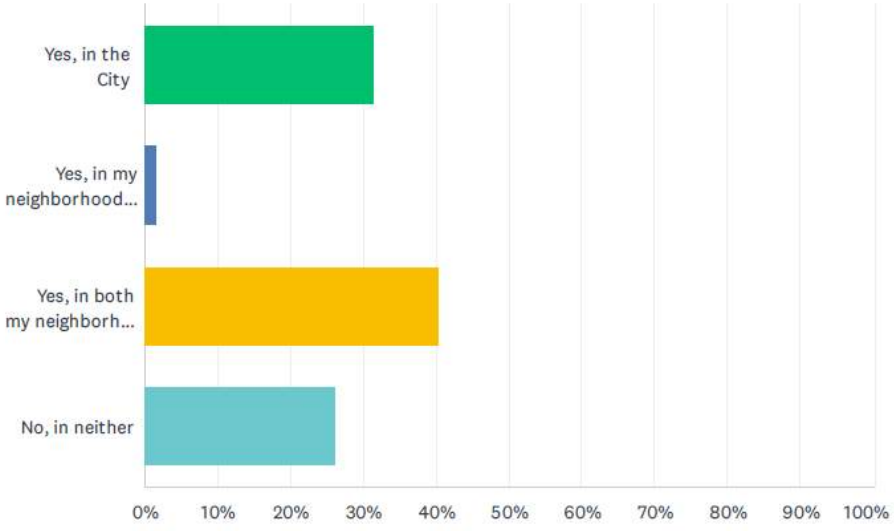


8. Please identify the neighborhood in which you live.

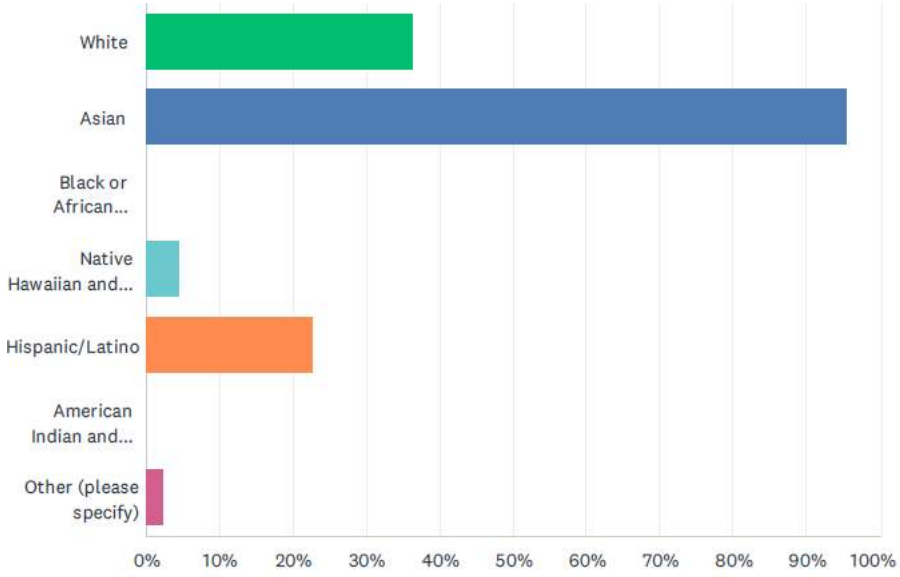
NEIGHBORHOOD	NUMBER OF PARTICIPANTS	PERCENTAGE
Mills Estates	7	11.67%
Bayside Manor	4	6.67%
Green Hills	3	5.00%
Airport Park	0	0.00%
Millbrae Highlands	25	41.67%
Glenview Highlands	1	1.67%
Manor #1	0	0.00%
Downtown Millbrae	4	6.67%
Millbrae Meadows	4	6.67%
Capuchino	1	1.67%
Telescope Hills	0	0.00%
Marina Vista	1	1.67%
Meadow Glen	3	5.00%
Lomita Hills	2	3.33%
Other	5	8.33%
Total Respondents:	**60**	

WRITE IN ANSWER RESPONSE: OTHER, PLEASE SPECIFY	
1.	Don't know name – near El Bonito and Hillcrest
2.	I don't know its name – I'm near Millbrae Ave and Ashton Ave
3.	Don't live in Millbrae
4.	Outside of Millbrae
5.	Not sure – off Millbrae Ave

9. Do you feel that there are areas of concentration of any particular ethnic group in your neighborhood or in the City?

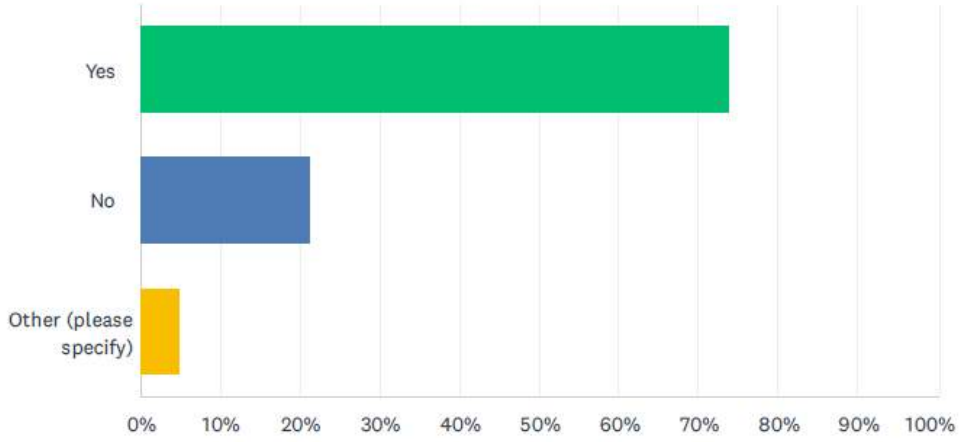


10. If you answered yes to Question 9, what ethic groups (select all that apply)?



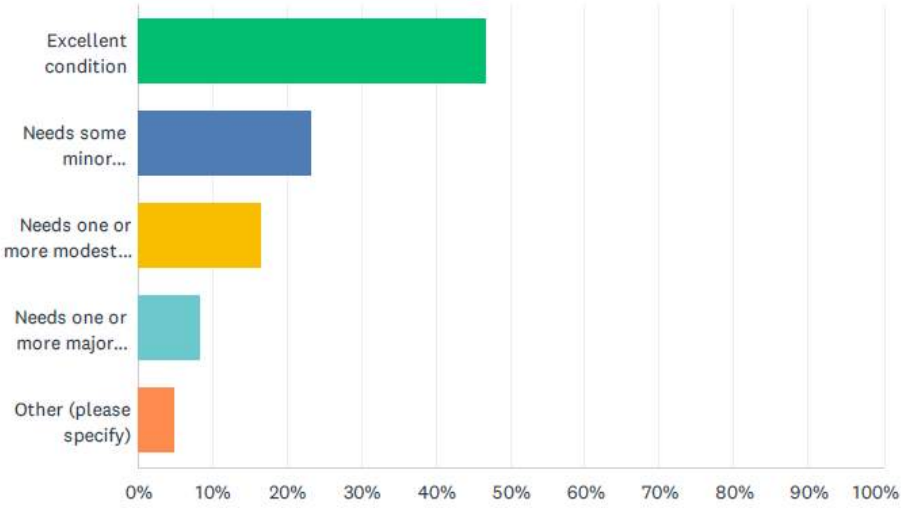
WRITE IN ANSWER RESPONSE: OTHER, PLEASE SPECIFY	
1.	Asian and specifically Chinese

11. Are you satisfied with your current housing situation?



WRITE IN ANSWER RESPONSE: OTHER, PLEASE SPECIFY	
1.	Yes but the house next to me owned by people in China left it vacant for years. I don't like living next to vacant homes
2.	High rent, 3000k for out date apartment
3.	Wish neighbors would take better care of their properties, renters don't respect their neighborhoods

12. How would you rate the physical condition of the unit you live in?

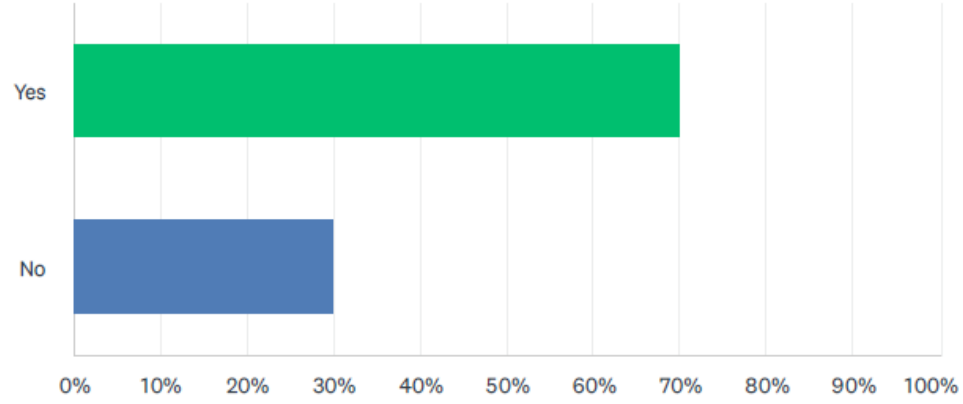


WRITE IN ANSWER RESPONSE: OTHER, PLEASE SPECIFY	
1.	Needs bathroom remodel for aging, some water damage its almost 100 years old and needs anew garage floor but that is only if money falls off a tree, a last repair
2.	Too expensive
3.	Needs to be in Millbrae

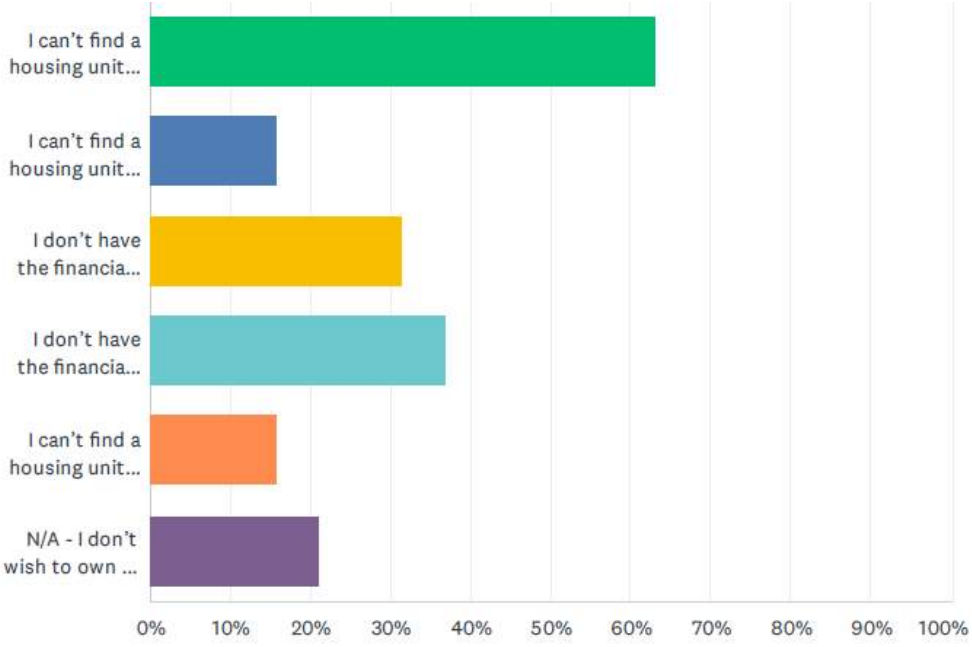
13. What are the three most important factors to you in choosing your current housing unit (select only the three most important)?

RESPONSE	NUMBER OF RESPONSES	PERCENTAGE
Cost	31	54.39%
Close to childcare	1	1.75%
Close to public transportation/transit stops	11	19.30%
Close to essential services (libraries, banks, doctors' offices, etc.)	15	26.32%
Close to work or other job opportunities	16	28.07%
Close to parks and recreation areas	7	12.28%
Close to restaurants, entertainment, and/or shopping	14	24.56%
Close to quality public schools	15	26.32%
Low crime rate	23	40.35%
Number of bedrooms	15	26.32%
Landlord accepts Section 8 housing vouchers	0	0.00%
Landlord Accepts pets	6	10.53%
Walkability	12	21.05%
Large yard	5	8.77%
Adequate space	19	33.33%
Racial/ethnic diversity of the neighborhood	5	8.77%
Total respondents:	**57**	

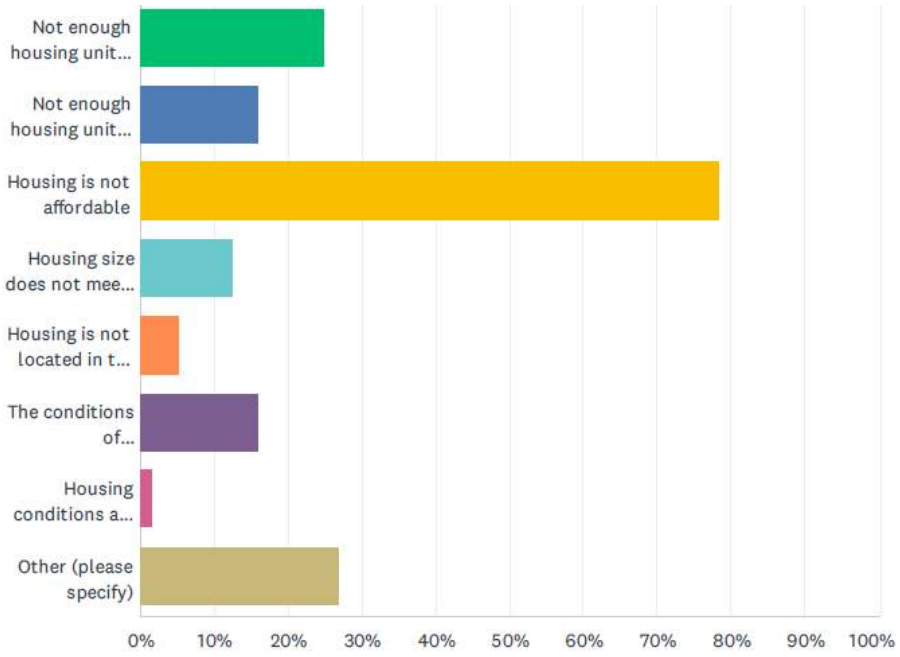
14. Do the housing options in the City of Millbrae meet your needs?



15. If you don't own a housing unit in Millbrae (but want to but one) it is because (choose all that apply)



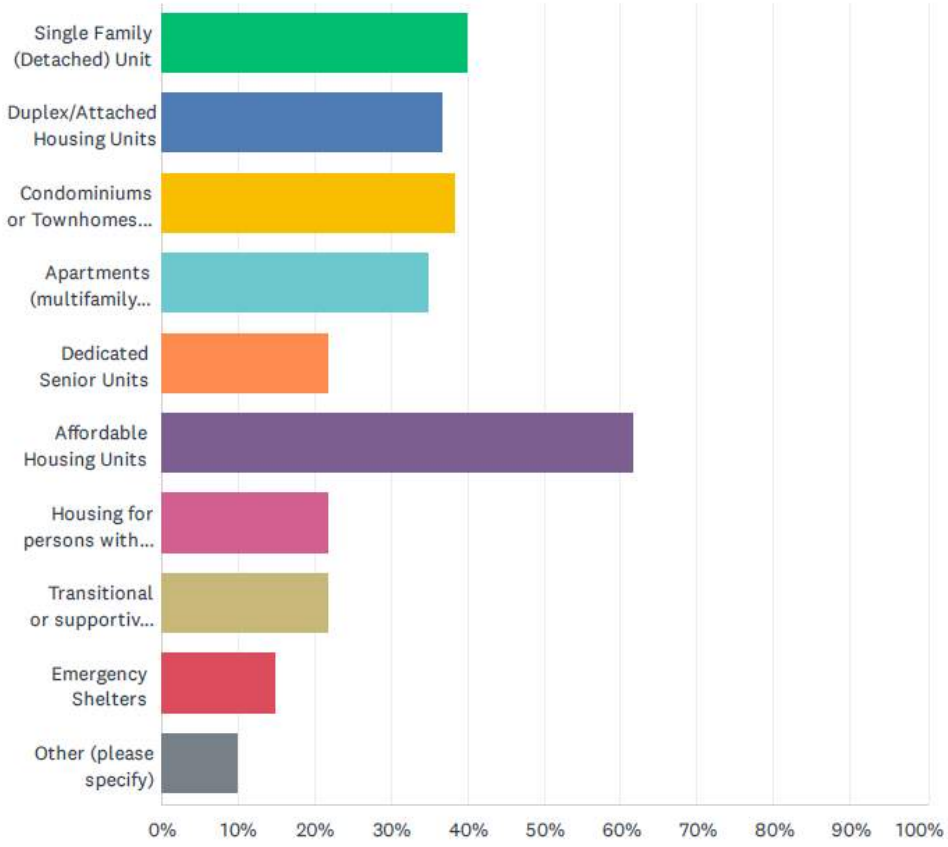
16. As a City resident, what do you feel is the biggest housing problems in Millbrae? Choose top two only.



WRITE IN ANSWER RESPONSE: OTHER, PLEASE SPECIFY	
1.	Single family zoning
2.	14 and 15 there aren't enough units for seniors who want to live in own home but it needs to be one story no stairs and I choose to live in Highlands because of the lovely architecture and individuality of the homes. Hate that newcomers come in and turn homes in Millbrae into modern monstrosities and hardscape their yards no pride for them just how to make money
3.	I have a house
4.	Streets overloaded with parked cars. Can't even get the street cleaner to do much of a job!!
5.	Aging streets, infrastructure, high cost of sewer & water
6.	Prop 19, not fair
7.	Neighbors speeding, renters burning trash and living in crowded conditions, too many cars on the street and not in garages. Lots of newcomers that don't understand how to be neighborly
8.	Too many people
9.	Not enough room and parking
10.	Great housing
11.	Too many vehicles per housing unit. Streets are crowded and front yards are being turned into parking spaces
12.	City services could be better. Are improving under the management of Tom Williams
13.	Water am, crime is up a lot, garbage utilities are higher than other areas, we do not have the infrastructure for more units. Housing is too expensive
14.	We don't fulfill our RHNA goals

WRITE IN ANSWER RESPONSE: OTHER, PLEASE SPECIFY	
15.	Lomita park elementary school has terrible rating!

17. What types of housing are most needed in the City of Millbrae (select all that apply)?



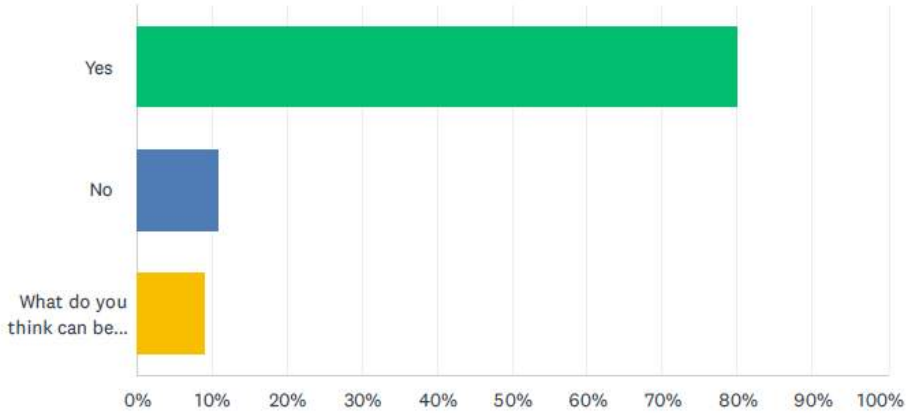
WRITE IN ANSWER RESPONSE: OTHER, PLEASE SPECIFY	
1.	For older people, fewer stairs, bathroom access, not to be forced into assisted living. Maybe we have some locations for "small homes" and not ADUs put in to benefit the one and create hell for neighbors
2.	No other housing is needed. Infrastructure is poor - poor public transportation, poor roads, lack of water, poor electricity - so NO MORE HOUSING
3.	Needs to be in Millbrae
4.	Need to improve what we have—do we really need more population??
5.	No more housing
6.	Social Housing

18. What do you think can be done to address the housing problems and needs you identified in the prior two questions?

#	RESPONSES
1.	Radically rethink land use policy
2.	City needs to step up on tree care. Housing needs to be livable and with growing heat waves and most homes without air conditioning and the cost of adding AC both as base cost but energy cost, we need more trees to help keep the city cool. And I don't want to live next to a plastic lawn giving off carcinogenic air pollution. Common Millbrae stop letting people turn us into crummy looking place. And way way too many cars.
3.	Stop building these massive high-density units. Stop raising the Water and Garbage rates
4.	Encourage single family unit owner to expand their property for rentals.
5.	Have A Housing Commission that regulates All Housing Types Millbrae.
6.	A plan that does not destroy current single housing Zoning, requires developers to create more affordable housing for purchase as well as rent.
7.	Affordability.
8.	Change the CA law that requires cities to build more housing. This "one size fits all" law is ridiculous and out of step with the environmental situation - lack of water, poor management of public utilities (PG&E), global warming, endless fires - that will exacerbate these conditions. Change the law and do not proceed blindly without questioning these regulations. It's shortsighted and a coward's way out.
9.	Very little.
10.	Many streets have not been resurfaced in over twenty years. Streets and sidewalks should be kept in a safe condition.
11.	Require new developments to have additional low-cost units, prefer additional opportunities for home ownership, increase affordable childcare, become an age friendly city, stop settling for mediocre projects. Improve planning department.
12.	Developers should be forced to include minimum 25% affordable and/or senior housing units
13.	Build more, increase proper tax. Everyone should pay same rate.
14.	Streamline the process and reduce interference from neighbors and city govt.
15.	More city outreach for these types of housing.
16.	Welcome to the city packets - with information on how to participate in civic matters. More code enforcement and policing. Look at vacant retail properties to redevelop into housing.
17.	More multi-unit homes in all parts of the city. No one part of the city should have to bear the brunt of new home building. Each neighborhood should accommodate 3-6 story buildings with 4-8 (at least) homes in each building. This will make for a more walkable, vibrant, equitable and environmentally sustainable Millbrae. No new parking needs to be built with these homes. Instead, build out bike lane and bus infrastructure.
18.	Build more affordable housing with any approved projects. Limit Airbnb, etc. Tax unoccupied housing. Discourage real estate practices that raise prices (unnecessary remodels, staging, etc.).
19.	Allow more diverse types of housing (not just single family and apartments). Encourage "gentle density" in all neighborhoods. More supply for various housing needs.
20.	Stop building housing units.

#	RESPONSES
21.	I think the city is on the right track adding housing near transportation/services. The ADU rules could lead to parking and neighbor wars.
22.	Increase density and height limits on residential.
23.	BAAHA options.
24.	High density buildings without adequate parking and water supply is not going to work
25.	There is adequate housing for the population in Millbrae.
26.	Build up.
27.	I don't have any idea.
28.	More affordable housing around the transit area and fixing up homes and neighborhoods (parks) east of El Camino.
29.	Plan low density attractive multifamily housing as in Belmont, San Carlos not more than 3 stories.
30.	Rental relief voucher - give current residents who rent $1000/month Turn all empty lots in Millbrae into affordable housing Make an affordable loan process for Millbrae Renters to own a house in Millbrae.
31.	1. Do away with single-family zoning, 2. Implement/increase tax on non-owner occupied units units, 3. Implement/increase tax on single-family units on large lots, 4. Implement/increase tax on mixed-use lots with no housing, 5. Subsidize housing for elderly, disabled, and/or veterans, 6. Fast-track more mixed-use mid-/high-rises downtown and along Skyline, 7. Implement/increase tax on rental units priced above median rent of comparable units in Millbrae, 8. Develop the golf course.
32.	Construction of significant more housing units that can be rented or sold to more moderate income families. Current inventory of new housing units are too expensive and seem to be targeted to higher wager earners, i.e. tech workers, not essential workers such as retail and hospitality workers.
33.	More permissive zoning that allows medium and high-density housing in more neighborhoods. Streamlined approval for housing proposals that meet the needs of Millbrae's current and future residents.
34.	By-right construction, higher density limits. No public hearings.
35.	I want to see much taller buildings as close to transit as possible with as much ownership opportunities as possible.
36.	Securing and administering continued ownership or rental of truly affordable housing. Most service-oriented jobs don't make even the minimum to qualify for "affordable housing" being built in Millbrae.
37.	Provide more condos so residents have pride of ownership, manage their property and care about their community.
38.	Stop building more apartments, address our current issues (utilities and garbage rates, increased crime, decreased parking).
39.	Force developers to up the proportion of very low and low income units they provide.
40.	State and Federal involvement to help defray cost to build.
41.	Stop sharing a school (Lomita) with San Bruno who doesn't contribute to school bonds nor costs in Millbrae and yet they pull down school academic rating.

19. Do you think there are factors that prevent affordable housing from being built in the community?



WRITE IN ANSWER RESPONSE: WHAT DO YOU THINK CAN BE DONE TO ADDRESS THESE BARRIERS?	
1.	Single family zoning.
2.	Realtors and council members who go to China and advertise bring your suitcases full of cash so they come here to hide their money, get a jump on immigration lines and then leave homes empty. They contribute nothing. No foreign or corporate ownership of homes in Millbrae should be a goal. And no long-term vacancies.
3.	Outdated infrastructure. Start requiring developers to improve eroding utilities, sewers, power lines etc as part of the cost to build here.
4.	Improve community safety and services.
5.	Start Working With Hotels and Landowners.
6.	Hold off on any more new developments unless it's for affordable housing.
7.	Not enough land.
8.	Special interests that will pay and weasel their way into government to avoid all but their interests.
9.	too much housing being built now. Millbrae has ruined the small-town feel
10.	Make it Affordable and within walking distance of transportation and services.
11.	Greedy developers and lack of defined planning ordinances and fees. Better legal counsel willing to defend city ordinances and the city's best interests.
12.	Elect new city government.
13.	Reelect a new city council.
14.	Need more water, so look at helping homes with using grey water for landscaping. Cost of construction - so look at prefabricated housing, finding financing partners (example school district).
15.	change zoning and the general plan to permit larger structures throughout the city.
16.	Have fewer real estate professionals as mayor etc.
17.	Councilmembers and others are defiant of State housing laws, and they want to concentrate housing in downtown only.
18.	Require developers to include affordable housing.

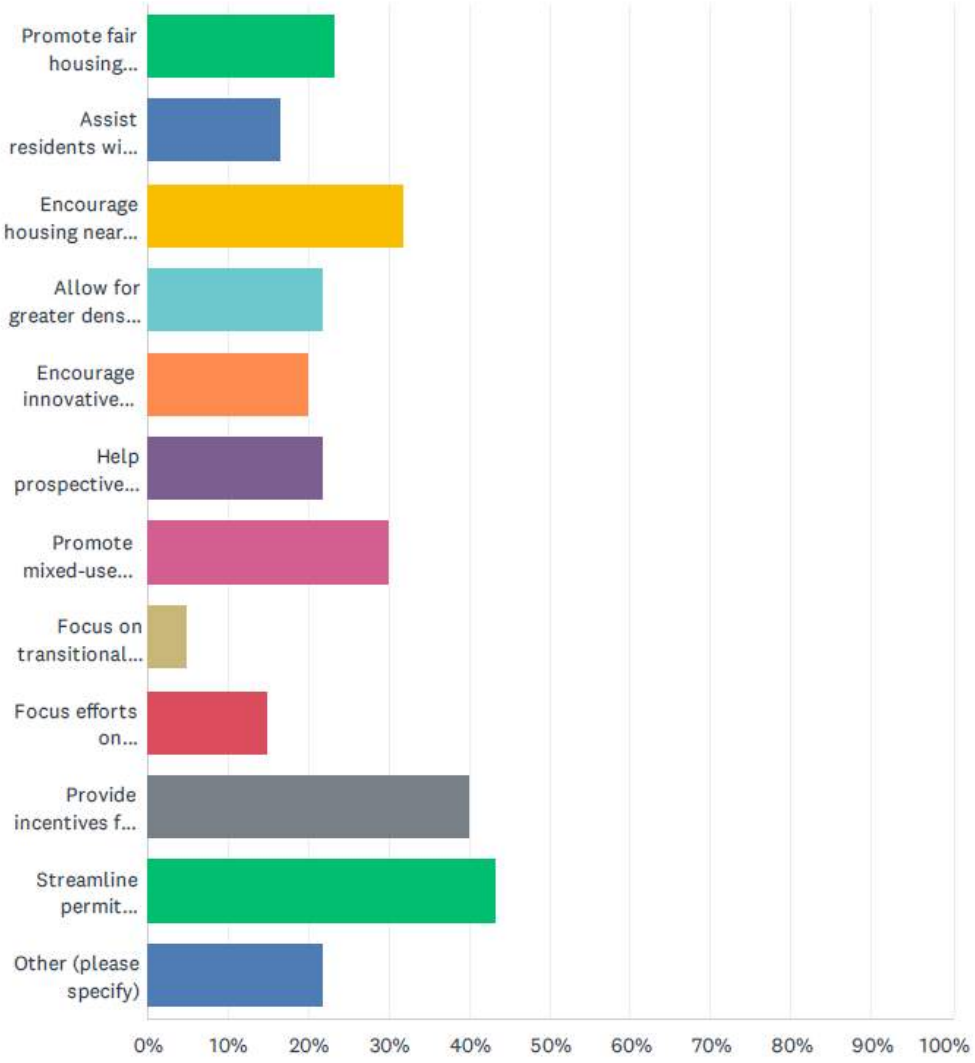
WRITE IN ANSWER RESPONSE: WHAT DO YOU THINK CAN BE DONE TO ADDRESS THESE BARRIERS?	
19.	Not much the city can do about the lack of available land and the high cost of almost everything.
20.	There is no room to expand without compromising existing homes.
21.	Build for the future. Insist on enough parking spaces.
22.	Overcome NIMBY-ism.
23.	Need more funding to help developers build affordable units or remove prevailing wages that make it so expensive to build units affordably.
24.	Barriers protect quality of life of current residents.
25.	Money Vouchers for Renters.
26.	Do away with single-family zoning, 2. Implement/increase tax on non-owner occupied units units, 3. Implement/increase tax on single-family units on large lots, 4. Implement/increase tax on mixed-use lots with no housing, 5. Subsidize housing for elderly, disabled, and/or veterans, 6. Fast-track more mixed-use mid-/high-rises downtown and along Skyline, 7. Implement/increase tax on rental units priced above median rent of comparable units in Millbrae, 8. Develop the golf course.
27.	Halt further developments that don't significant provide more affordable housing.
28.	Selection of public land for 100% affordable housing/site dedication.
29.	Politics. Nimby'ism, Prop13.
30.	See answer above.
31.	Developers need to profit for them to make the investment in building.
32.	Fix infrastructure first to accommodate more adults and children!
33.	People are scared that our quality of life will go down if we build affordable housing.
34.	Negotiate with developers. Support people who work in Millbrae.
35.	Cost of goods and services need to come down.

20. How important are the following concerns to you and your family? (Check one box per line in the table below)

OPTION	VERY IMPORTANT	SOMEWHAT IMPORTANT	NOT IMPORTANT	DON'T KNOW	TOTAL RESPONDENTS
Access to affordable childcare.	21.67%	18.33%	53.33%	8.33%	60
Increased City services for residents with disabilities.	18.64%	52.54%	20.34%	8.47%	59
Rental assistance for low-income residents, the unemployed, and the underemployed.	27.12%	35.59%	37.29%	1.69%	59
Programs to improve environmental conditions and reduce health hazards	58.33%	28.33%	13.33%	0.00%	60
Children who grow up in Millbrae should be able to afford to live in Millbrae.	40.68%	38.98%	16.95%	6.78%	59
Residents who have made Millbrae their home should not	59.32%	33.90%	5.08%	1.69%	59

OPTION	VERY IMPORTANT	SOMEWHAT IMPORTANT	NOT IMPORTANT	DON'T KNOW	TOTAL RESPONDENTS
be displaced as housing costs increase.					
There is a need to create mixed-use (commercial/office and residential) projects in the community where residents can walk to work and services so there is less driving.	38.33%	31.67%	23.33%	6.67%	60
The housing market in Millbrae should have many types of housing, including single-family homes, townhomes, apartments, and condominiums to meet the varied needs of local residents.	60.00%	21.67%	13.33%	5.00%	60
Establish special needs housing for seniors, large families, and/or persons with disabilities.	27.12%	44.07%	22.03%	6.78%	59
Integrate affordable housing throughout the community to create mixed-income neighborhoods.	44.07%	23.73%	25.42%	6.78%	59
Encourage energy conservation through site and building design.	67.80%	23.73%	8.47%	1.69%	59
Provide shelters and transitional housing for the homeless, along with services to help move people into permanent housing.	32.20%	35.59%	20.34%	11.86%	59
Encourage the rehabilitation of existing housing stock in older neighborhoods.	36.67%	40.00%	15.00%	8.33%	60
Establish programs to help at-risk homeowners keep their homes, including mortgage loan programs.	32.20%	40.68%	23.73%	5.08%	59
Fair/Equitable Housing opportunities and programs to help maintain and secure neighborhoods that have suffered foreclosures.	40.68%	28.81%	22.03%	10.17%	59

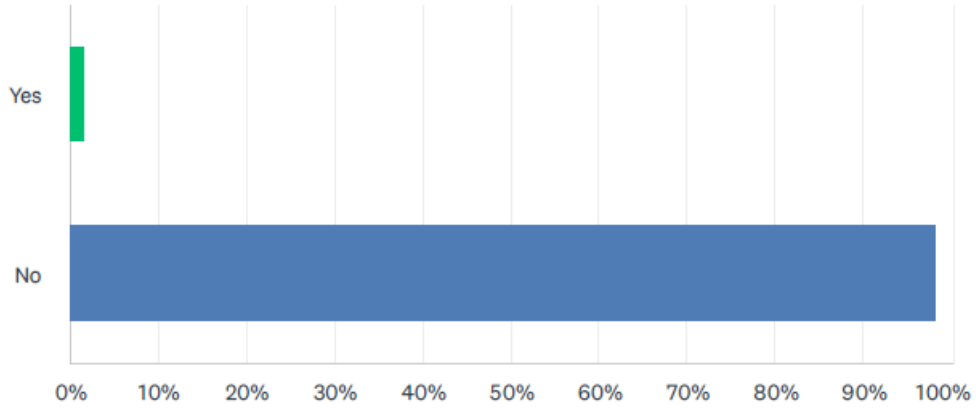
21. What types of programs or activities do you believe the City should concentrate on over the next eight years? Select your top 3 recommendations.



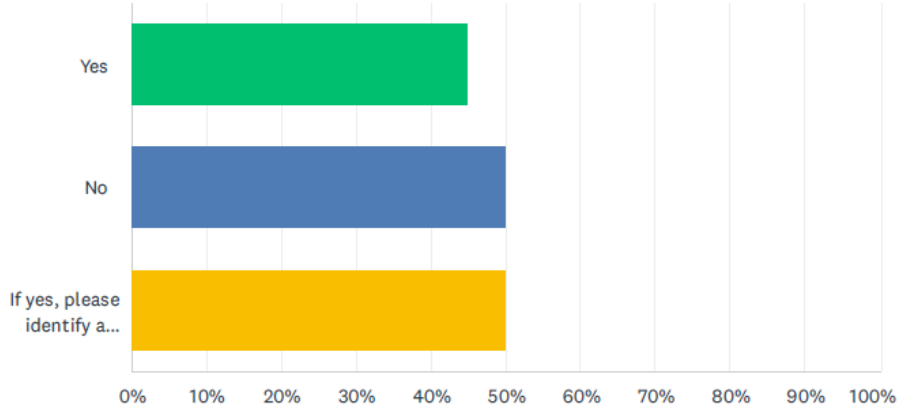
WRITE IN ANSWER RESPONSE: OTHER, PLEASE SPECIFY	
1.	Rewrite policy to allow for high density and mixed-use development.
2.	Vacant house ordinance - people who are simply holding onto empty homes (not in probate) need to sell or rent, no short-term rentals, no corporations should own homes in Millbrae and look out for sneaky trusts. Realtors should be educated as to what they are doing that is bringing Millbrae down. Empty homes aren't going to local restaurants and aren't shopping locally, the problems created by greedy realtors is endemic.
3.	Tax or create a law that prohibits out of town speculators to buy homes/housing and leave them empty. No more Air B&Bs.
4.	Greater oversite on developments, stronger regulations that reduce negative impacts on the community, enhance public safety, permit infrastructure improvements to the city and schools, improve public information, set quality building standards, improve El Camino Real.

WRITE IN ANSWER RESPONSE: OTHER, PLEASE SPECIFY	
5.	Encourage multifamily housing in every neighborhood.
6.	Staying a small community like Millbrae used to be.
7.	No programs. We need a police dept.
8.	Insist on enough city parking areas. Cars are choking the city.
9.	"Rehab current housing" what does that mean? Allow multi-story additions for multi families? Build ADUs in backyards? Progressives want to destroy single family neighborhoods.
10.	Streamline permit process for affordable housing projects.
11.	More by-right construction, including multifamily.
12.	BUILD MORE HOUSING NOW. Enough foolishness.
13.	Help current residents keep their homes, again manage utilities and stop increases that are constant, stop building more in Millbrae.

22. Do you or someone in your household experience difficulties accessing services due to language barriers?



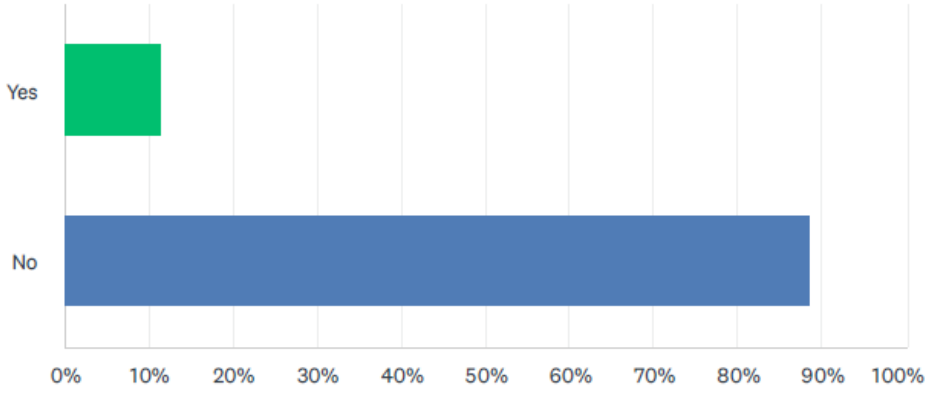
23. Do you feel burdened by pollution or noise in the City? If yes, please identify a source or area of concentration of pollution or noise?



WRITE IN ANSWER RESPONSE: IF YES, PLEASE IDENTIFY A SOURCE OR AREA OF CONCENTRATION OF POLLUTION OR NOISE	
1.	Can't sleep from airport noise and is has gotten worse (pre-covid and now getting back to as bad as it was in 2019. Also air pollution. But Millbrae doesn't do much for the environment. I know money was taken from climate change work to help homeless BART and SFO dump into Millbrae. We should be suing BART for how they allow the homeless to attack the people of Millbrae.
2.	The Airport. Way more air traffic then when we moved here.
3.	Central Park Area Un Muffled Vehicles.
4.	Airport
5.	SFIA Noise, Illegal fireworks, loudness of horns on trains.
6.	SFO but it was here first. This question should be moot as the city built around the airport so any complaints about noise should be discarded.
7.	Airport
8.	Airport noise at night.
9.	Trash in downtown and near transit. Too much noise from gardeners and late-night flights out of and into SFO.
10.	Airport noise and traffic.
11.	Train, airport
12.	Rearward jet noise of plans taking off away from us.
13.	Airport noise
14.	SFO Airport
15.	Cars and trucks are too loud and degrade air quality.
16.	The airport
17.	Downtown congestion
18.	Car burn outs, speeding in residential streets, dumping furniture in front of apartment complex and center divide/islands, Shopping carts, enforcing no smoking near multicomplex within 40 ft ordinance.

WRITE IN ANSWER RESPONSE: IF YES, PLEASE IDENTIFY A SOURCE OR AREA OF CONCENTRATION OF POLLUTION OR NOISE	
19.	Trucks traveling on Helen Drive at high speeds and late-night Airport noise.
20.	New buildings
21.	SFO
22.	Cars, cars, cars
23.	Trains and planes.
24.	Neighbors with multiple diesel vehicles and dirt bikes.
25.	Airport and local traffic.
26.	There is noise from El Camino, Bart, Caltrain, and the airport. Some days, it smells like some kind of fuel exhaust.
27.	Airport
28.	Airport noise and pollution, leaf blowers.
29.	Airport, Caltrain
30.	Train track and airplane noise.

24. Have you experienced discrimination as a resident of Millbrae in the realm of housing based on protected class (age, familial status, gender, marital status, mental disability, national origin, physical disability, race, religion, source of income, student status, or sexual orientation)?

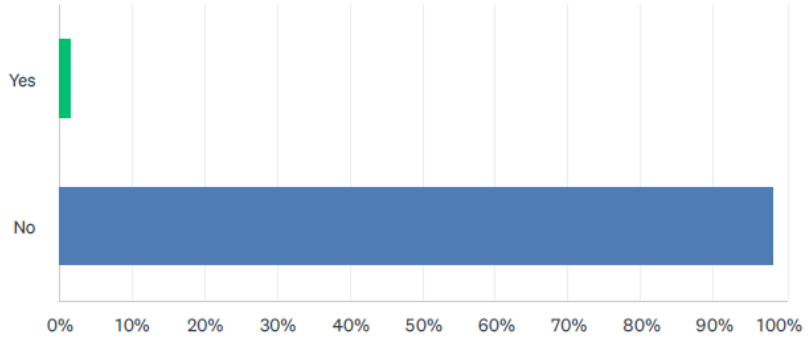


25. If you have experienced discrimination in the realm of housing, what protected class was it based on?

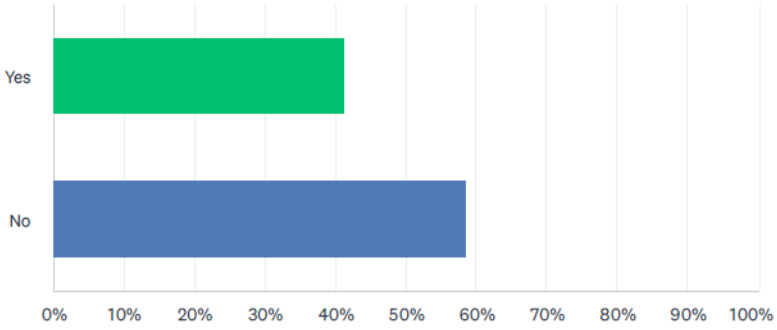
RESPONSE	NUMBER OF RESPONSES	PERCENTAGE
Age	2	20.00%
Familial status	0	0.00%
Gender	0	0.00%
Marital status	0	0.00%

RESPONSE	NUMBER OF RESPONSES	PERCENTAGE
Mental disability	1	10.00%
National origin	1	10.00%
Physical disability	0	0.00%
Race	4	40.00%
Religion	0	0.00%
Source of income	0	0.00%
Student status	0	0.00%
Sexual orientation	2	20.00%
Total respondents:	**10**	

26. Have you sought fair housing services from the City or one of their partners: Legal Aid Society of San Mateo County, Project Sentinel, Community Legal Services of East Palo Alto, or Peninsula Conflict Resolution Center?



27. Do you think the City and its partners provide adequate fair housing services?



28. Please rank the following groups by order of their needs for housing and related services in the community. 1 = greatest need and 5 = least need.

OPTION	1	2	3	4	5	TOTAL /SCORE
Seniors	30.91%	25.45%	16.36%	16.36%	10.91%	55 / 3.49
Large families (five or more members)	12.73%	20.00%	14.55%	36.36%	16.36%	55 / 2.76
Persons with disabilities	3.70%	25.93%	44.44%	18.52%	7.41%	54 / 3.00
Young adults	32.14%	17.86%	7.14%	19.64%	23.21%	56 / 3.16
Persons experiencing homelessness	23.64%	10.91%	20.00%	7.27%	38.18%	55 / 2.75

29. Do you fear being displaced out of your community as a result of high housing costs, new developments, or gentrification?

#	RESPONSES
1.	Yes
2.	Yes, fear of Prop 19, fear that while the Asian community feels discriminated against, there are many cases of some Asians being deliberately cruel to the white population, calling many longtime residents Prop 13 "xxxx". I've had mid age Asian men step in front of me and close the door in my face (entering Starbucks) so when I put Race in question 25, there is as much hate from some Asians as those who like to say the Asians are being picked on.
3.	No
4.	Not yet
5.	Yes, as inflation keeps going
6.	Yes
7.	No
8.	No
9.	No
10.	Yes
11.	High cost
12.	No, we've lived here so long that it is affordable for us
13.	No
14.	If I were to sell my home it would be highly unlikely for me to downsize and stay in this area. Not enough opportunities for ownership of smaller units.
15.	Yes
16.	No
17.	No
18.	Not yet
19.	No
20.	I do not believe new development displaces people unless it causes the demolition of their home. but lack of development could displace me through exacerbating high prices.

#	RESPONSES
21.	No
22.	Not personally, but I would like to live in a community that's more diverse.
23.	No
24.	No
25.	My fear of being displaced is because of the water and sewer bill being so high. I conserve on water but the effect on my bill is minimal. Something must be done!
26.	No
27.	No
28.	No
29.	Yes
30.	No
31.	No
32.	Yes
33.	No
34.	No, but by increasing taxes.
35.	No
36.	Yes
37.	No
38.	Not right now
39.	Planned high rise developments promise to destroy quality of life. We would move in a moment but family keeps us here.
40.	Yes, I'm worried about rent going up.
41.	Yes
42.	No
43.	No
44.	Gentrification means something is getting built. Bring it. I get displaced by rising cost-of-living due to lack of construction.
45.	Yes we have been displaced due to costs. New developments do NOT displace anyone. Gentrification happens when you don't build more EVERYWHERE.
46.	No
47.	No
48.	Yes. We currently have 3 generations living in our home. This is the only way we can stay in our home of 40 years. This is not right. The city of Millbrae is changing and loosing its charm with all this building.
49.	No
50.	No
51.	No

30. Have you or anyone you know in the City had to move between 2015 and now due to high housing costs?

#	RESPONSES
1.	No

#	RESPONSES
2.	Yes, to Oregon, to the central valley, people who were active with community activities, we are losing them. The very people who help make us a community, instead we get vacant homes or people here only while their kids are in school and never vest into the community. I too am wondering where to move, where I won't have to worry about how to pay for water and maintain a big house, but you can't downsize from a bigger house to something cute and small with a small yard because we don't have that kind of housing. And frankly, I don't want to go downtown where the sacred homeless literally go to the bathroom in front of shops.
3.	No
4.	No
5.	Don’t know
6.	No
7.	Yes
8.	Yes
9.	No
10.	Yes
11.	No
12.	No
13.	No
14.	Yes
15.	Yes
16.	Yes
17.	Yes
18.	No
19.	Yes
20.	Yes
21.	No
22.	No
23.	No
24.	No
25.	No
26.	No
27.	No
28.	No
29.	Yes
30.	Yes
31.	Yes
32.	No
33.	Yes
34.	No
35.	No
36.	No
37.	Yes

#	RESPONSES
38.	No
39.	Yes
40.	They moved because of the urbanization of the city and increased crime due to inadequate law enforcement.
41.	No
42.	No
43.	Yes
44.	Me, twice
45.	Yes. We moved for work and couldn't find housing.
46.	Yes
47.	Yes
48.	No
49.	No
50.	Yes
51.	No

31. Please show your support for the following potential housing strategies for your community in ranking order, with 1 representing the strongest and 5 representing the least support.

OPTION	1	2	3	4	5	TOTAL /SCORE
Facilitate the development of Accessory Dwelling Units.	22.64%	28.30%	15.09%	20.75%	13.21%	53 / 3.26
Allow for construction of micro-units (smaller housing units).	18.87%	22.64%	20.75%	22.64%	15.09%	53 / 3.08
Change zoning regulations to allow for higher density and taller housing.	25.93%	16.67%	24.07%	14.81%	18.52%	54 / 3.17
Rezone commercial sites to residential zoning to allow for more housing.	27.78%	20.37%	24.07%	14.81%	12.96%	54 / 3.35
Allow for the subdivision of single family lots to allow for more units.	5.88%	13.73%	15.69%	25.49%	39.22%	51 / 2.22

32. How important is it to you that new housing is located within walking or short biking distance to the following?

OPTION	VERY IMPORTANT	SOMEWHAT IMPORTANT	NOT IMPORTANT	TOTAL	WEIGHTED AVERAGE
Childcare	22.03%	33.90%	44.07%	59	2.22
Grocery Store	53.33%	25.00%	21.67%	60	1.68
Businesses Millbrae residents use regularly	50.85%	32.20%	16.95%	59	1.66
Park, Recreation Center, playground, fields, etc.	50.00%	33.33%	16.67%	60	1.67
School	48.33%	33.33%	18.33%	60	1.70
Religious institution	6.67%	25.00%	68.33%	60	2.62
Entertainment, restaurants, etc.	26.67%	41.67%	31.67%	60	2.05
Medical facilities	20.00%	51.67%	28.33%	60	2.08
Transit stop	38.33%	48.33%	13.33%	60	1.75
Bicycle facility (bike lane, trail, path, etc.)	22.41%	44.83%	32.76%	58	2.10

33. Are there any comments you would like to share with the City of Millbrae regarding the Housing Element Update?

#	RESPONSES
1.	Many people in Millbrae are "house rich" we are in that category, but that doesn't mean we can afford going solar, or putting in heat pump water heaters or other climate change actions. So it isn't just the of housing it is the cost of maintenance and of upgrading to a climate resilient world. Even caring for city trees are very expensive. The city needs to be a partner in helping those of us who helped Millbrae (we've been here since the 1960s) stay here and maintain and improve our properties. We are not rich, just because the house values are high. Why do people in SSF and San Bruno get state and federal aid and we flood and get no help at all. I don't get it. Millbrae needs to fight for us all of us, not just young people who think they should step into a house without working for it.
2.	Community input is a joke. The City Council doesn't care what the residents have to say. The high density housing built lately is hideous. The retail space is underutilized and targeted at specific customers, not the community as a whole. Where will all these new kids go to school?
3.	Continue improving existing housing services, such as fix street including sidewalk.
4.	Hope Millbrae Starts a Housing Committee.
5.	Be sure enough parking available.
6.	Please stop building more housing. Stop adding ADUs, apartments, multiple housing units. All those properties are being bought by real estate interests and held for speculation and have NO interest in making them available for working class people to buy. There are vacancies in these units NOW that can't be purchased because the cost to buy one are too high due to speculators.
7.	too much housing being built now. Millbrae Ave near 101 is going to be a nightmare. I loved the small town feel of Millbrae but it's going away. Millbrae is building too many units without sufficient parking. residents living in high density units in walkable areas still have cars and most more than one. Millbrae is just going to create parking wars which is already going on.

#	RESPONSES
	WAKE UP.
8.	No
9.	Given the recent publicity on ADUs -it seems planning is not doing their job. Also seems as if Millbrae's ordinance is not clear and State laws are out of control. Need a standard for ADUs that is acceptable to residents and neighbors who will be impacted. Homeowner's must be held to strict standards and permits. Requiring housing in walking distance to everything wrongly assumes everyone is able body and has no disabilities or age limitations. It also wrongly assumes it is safe to walk 24 hours a day and that is not true. If you want to enhance walk ability developments need to start paying for better sidewalks, lighting and bike paths.
10.	No high rise over 3 stories.
11.	Please be very clear about Housing's impact on water and other resources. Explain what the costs are.
12.	The city should embrace this opportunity to plan for the housing the community needs. There will be voices advocating for the status quo, however it's not hard to see that housing policies of the past have only served to concentrate wealth, access to opportunities and destroy the environment. Let's be the bold leaders following generations will look back on with pride who brought the city in the direction of housing justice.
13.	It's not directly related to the Housing Element update, but I sincerely hope that more housing in Millbrae which will bring in more people will eventually lead to a better downtown (commercial) Millbrae. Except for Trader Joe's, I never shop downtown because it's so tacky. (Sorry for being so blunt.)
14.	Grew up in San Bruno. Always wanted to live in Millbrae. Bought here over 40 years ago. It was a small, wonderful city. Now the traffic and congestion are unbearable and new housing will only make it worse.
15.	Ensure parking for all residential units. The assumption people will get rid of their cars is never going to happen.
16.	Downtown, especially Broadway, is already too congested/crowded with car traffic, so don't encourage any more new housing than is absolutely required by the State.
17.	My real answer to #31 is None of these. The form should permit that answer.
18.	Until water/sewer, streets, traffic is addressed, STOP BUILDING. We don't have the infrastructure to support the current residents, WE DONT NEED MORE.
19.	Millbrae needs density
20.	Quit building apartments for transient residents who overburden city resources and vote for initiatives that help them then move leaving long term residents to pay for their stay. This city is not looking out for its long-term residents!
21.	New multi-family housing developments must be required to provide sufficient parking underground. Cannot assume residents will use public transit.
22.	I support more housing but only if there are enough parking spaces so accommodate two cars per unit, which is the reality of modern life in Millbrae.
23.	This survey was deliberately designed to favor the dense, multifamily housing plan the city has proposed to implement.
24.	Affordable Housing is very important to me. I'm holding off having children because I feel like I'll never have the security of home ownership in the bay area.
25.	I know my idea to develop the golf course may sound far-fetched, but just think of all the housing the golf course could hold! Entire mixed-use mid- and high-rise neighborhoods on the golf course could create hundreds of jobs and thousands of homes. Alternatively, I would love to see a Millbrae garden large enough to actually move the city in the direction of self-sustainability— there are many options! but something about a large, water-guzzling playground for the rich in the middle of my city just doesn't sit right with me.

#	RESPONSES
26.	Developers must significantly increase the % of affordable housing units made available with new developments. The token few units required of developers is a joke.
27.	Please get Caltrain connected to SFO.
28.	It is absurd to try and block high speed rail with housing. Tipple the height everywhere else.
29.	All new building should have renewable energy and recycled water systems. Housing should be balanced with available schools, as well as other utilities and services.
30.	Allow more in-law units. Stop people in city government from blocking units that personally impact them. This should not have been allowed and does not lead to trust in government. How are cities like hills borough not building all this housing and we are. When do we say enough new buildings and focus on the residents who are here and their needs?
31.	I would really like to see more affordable housing being included in all the new developments. What we have committed to is just not enough and will not make a dent in the need for affordable housing in our community.
32.	I oppose high density housing projects currently being built and proposed projects that threaten our quality of life. Instead, City should concentrate on improving quality and aesthetics of business environment on El Camino and on Broadway. And build a parking garage!

COMMUNITY WORKSHOP #1 (JUNE 30, 2022)

- Notices & Social Media
- Presentation
- Workshop Minutes and Q&A
- Archived Meeting Items

Community Workshop #1 (June 30, 2022)

Notices & Social Media

City of Millbrae – Housing Element Community Workshop Social Media Posts

Facebook - https://www.facebook.com/cityofmillbrae

City of Millbrae
June 22 at 3:09 PM ·

The City is updating the Housing Element of the General Plan in compliance with State Law.

Please help shape the future of housing in Millbrae by joining us on Thursday, June 30, 2022, at 6:00 PM for a virtual Community Workshop.

Join the workshop here: https://us02web.zoom.us/j/84042163013

If you are unable to attend the workshop, you can still participate by Providing your feedback by filling out our Housing survey https://www.surveymonkey.com/r/FDMWVZW located on the housing element web page: ci.millbrae.ca.us/HEU

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CityofMillbrae @CityofMillbrae · Jun 22
Millbrae community please join us for a virtual Housing Element Update Community Workshop next Thursday, June 30, 2022, at 6:00 PM.
Help Shape the Future of Housing in Millbrae!
The City is updating the Housing Element of the General Plan in compliance with State law.
The Housing Element:
Please help shape the future of housing in the City by participating and providing you input.
Ways to participate include:
Visiting our dedicated web page with Housing Element information ci.millbrae.ca.us/HEU
Joining our Community Workshop on June 30, 2022 @ 6 pm https://us02web.zoom.us/j/84042163033
Providing your feedback by filling out our Housing survey located on the housing element web page https://www.surveymonkey.com/r/FBJMWYZW
We want to hear from you about housing in Millbrae!
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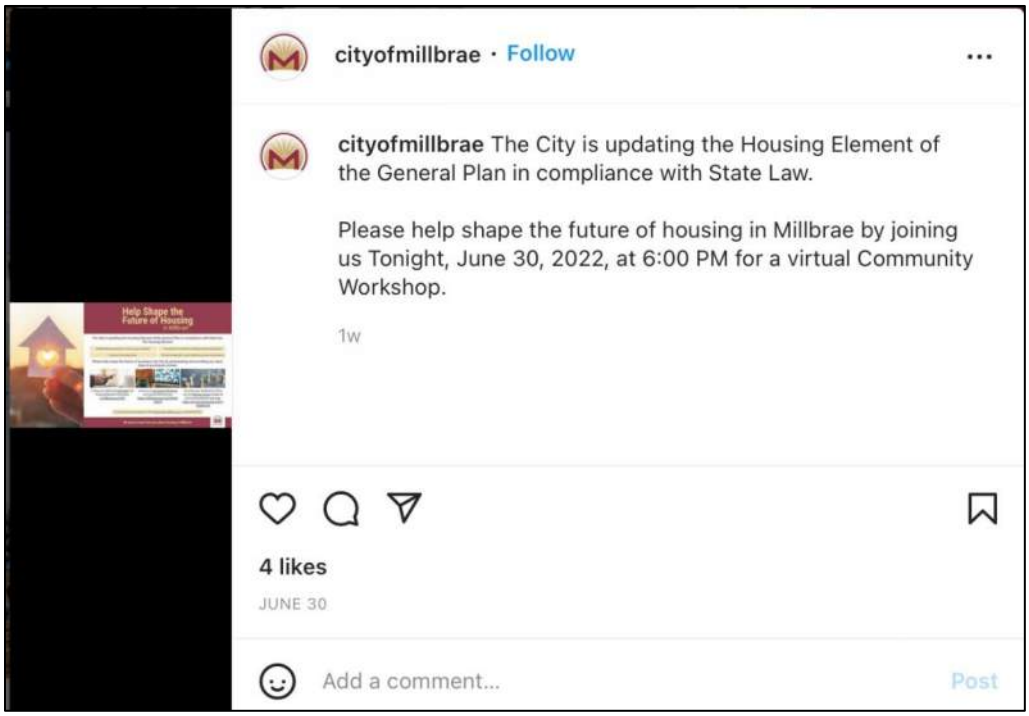
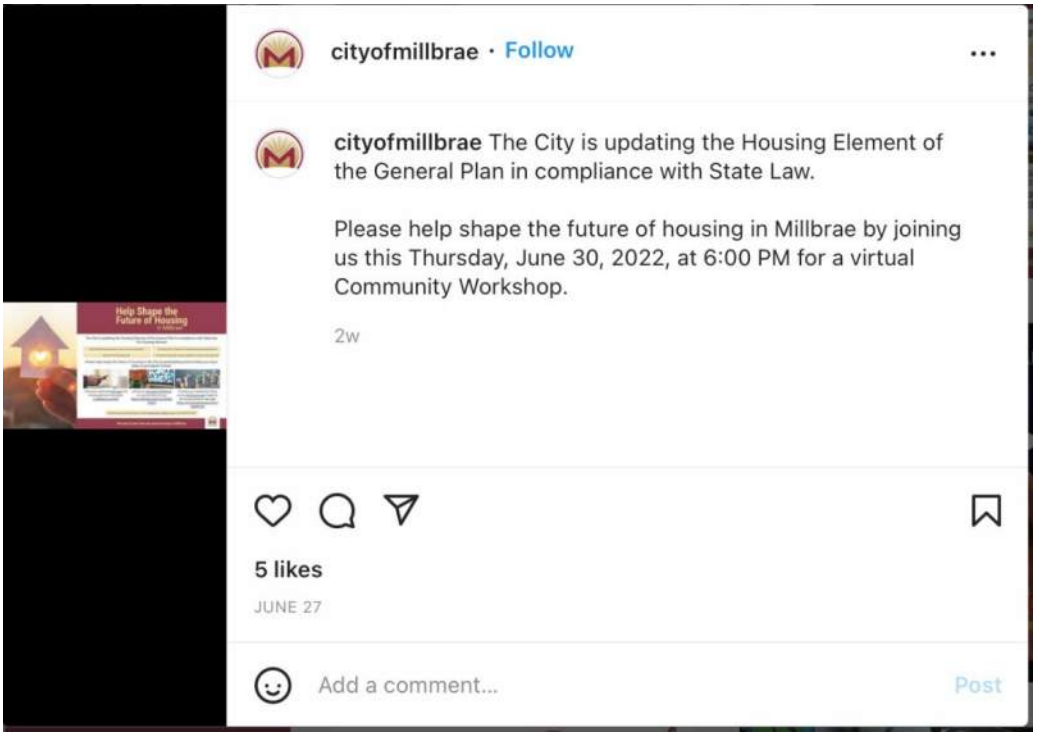
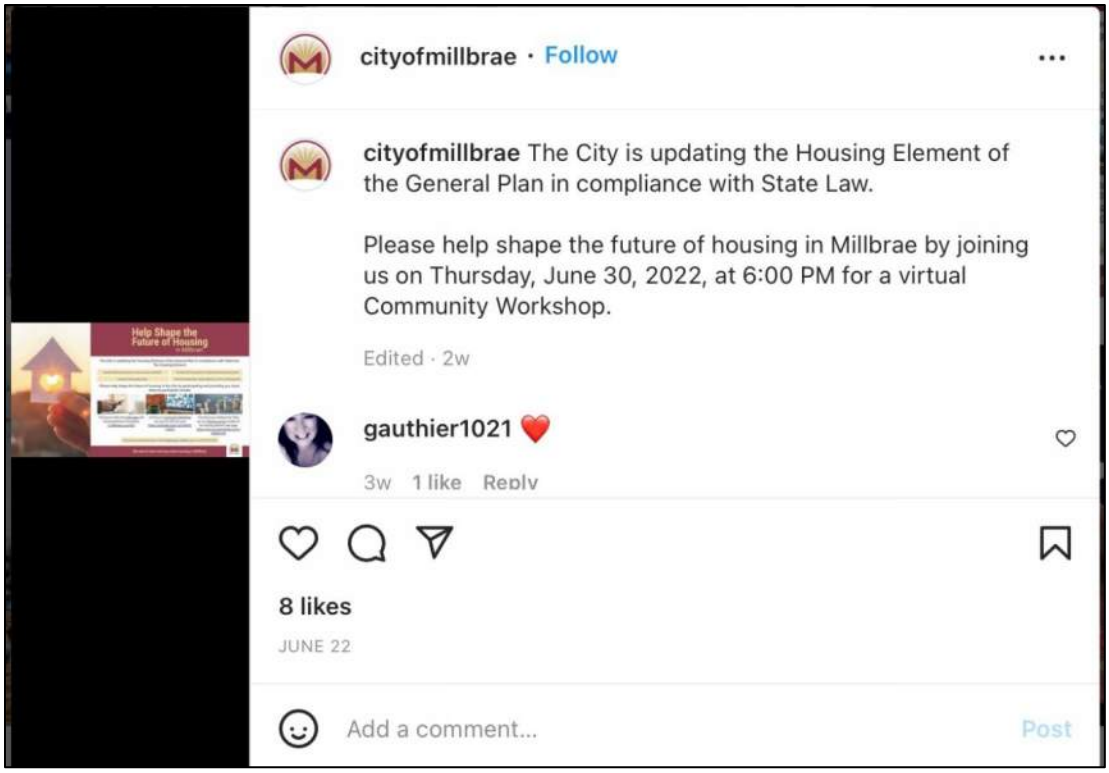
Instagram – https://www.instagram.com/cityofmillbrae/?hl=en



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cityofmillbrae The City is updating the Housing Element of the General Plan in compliance with State Law.
Please help shape the future of housing in Millbrae by joining us on Thursday, June 30, 2022, at 6:00 PM for a virtual Community Workshop.
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Help Shape the Future of Housing
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JUNE 22
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City Calendar

Housing Element Update Community Workshop

Date: 06/30/2022 7:00 PM
Location: Teleconference
621 Magnolia Ave
Millbrae, California 94030

Please click this link to join: https://us02web.zoom.us/j/84042163013

City of Millbrae Housing Element Flyer (with links)

Housing Element Update

What is a Housing Element?

The Housing Element is a core element of the City's General Plan. The General Plan is a long-range plan that guides decision- making and establishes rules and standards for new development and city improvements. It reflects the community vision for the future and is intended to provide direction through the year 2040.

The key components of the Housing Element include:

- A community demographic profile and analysis of population growth and trends.
- A list of available land suitable for housing development.
- An evaluation of local constraints or barriers to housing development as well as opportunities to develop housing.
- Housing goals, programs, policies, and resources for improving and creating housing within the City.

What is the Process?

The City of Millbrae initiated work on the 2023-2031 Housing Element of the General Plan to address the existing and projected future housing needs of the City. Local governments are required by California State law to adequately plan for the housing needs of everyone in the community. To do so, local governments adopt housing elements that provide plans, programs, and regulatory systems to create opportunities for housing.

This update is for the 6th Cycle Housing Element which will cover the eight-year planning period from 2023-2031 for the City. The previous 5th Cycle Housing Element covers the planning period from 2015 - 2023.

Get involved and make your voice heard

We need to hear from you to help ensure that the updated Housing Element reflects the priorities of our community. There are several ways to make your voice heard:

- Share your opinions in the Housing Element survey, available here.
- The City held a virtual public workshop on Thursday, June 30, 2022. The workshop introduced the element, presented a community profile, include live polling on housing needs, challenges, and issues, and staff received input on potential policies and programs. The presentation slides can be viewed here.
- If you would like to sign up for updates, please email nguevara@ci.millbrae.ca.us to be added to our interest list.
- After the draft Housing Element is prepared, there will be opportunities to comment on the draft document and attend public hearings for adoption.

Housing Element FAQs

Why update the Housing Element?

California State law requires that local jurisdictions update the Housing Element every eight years. These frequent updates are required because housing is critical to ensure economic prosperity and quality of life in our region. This Housing Element update is an opportunity to evaluate the previous element and determine which parts have been effective and which should be improved. It also provides an opportunity for residents to get involved and help determine housing priorities, thereby helping to ensure that the City is responding to residents' changing needs.

The updated Housing Element must be adopted by the Millbrae City Council and submitted to the State Department of Housing and Community Development no later than January 31, 2023. If this deadline is missed, Millbrae could lose eligibility for significant sources of funding currently provided by the State and the Association of Bay Area Governments (ABAG), including critical infrastructure and transportation funds.

Community Workshop #1 (June 30, 2022)

Presentation

6th Cycle Housing Element Update

Community Workshop

June 30, 2022

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INTRODUCTIONS

- City of Millbrae
  - Roscoe Mata, Planning Manager
  - Nestor Guevara, Associate Planner and Project Manager

Harris & Associates (Consultant)

- Hitta Mosesman, VP Community Development + Housing
- Irlanda Martinez, Project Manager
- Kelly Morgan, Deputy Project Manager

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PARTICIPATION & SHARING IDEAS

- Meeting etiquette to allow everyone to participate
- During the presentation
  - Audience will be muted
  - Type questions into Q & A
- After the presentation
  - Questions in Q & A answered first
  - After Q & A questions answered, click the Raised Hand
- Please be mindful of background noise when not muted

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WHAT IS A HOUSING ELEMENT?

- Primary Planning Document to Address City's Housing Needs
- State Law Requirement for all Cities & Counties as part of General Plan
- Housing Needs of Residents of All Income Levels
- Implement City's Vision & Plan to Meet Local Needs
- State Department of Housing and Community Development (HCD) Reviews & Certifies

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A HOUSING ELEMENT DOES NOT:

Require the City To Build Housing Units

But the City must ensure sufficient land is available to accommodate assigned units 'by right'

Provide Funding

However, compliance provides access to various state grant and local program funding sources

Authorize Construction

City projects will still need to go through the development review process

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HOUSING ELEMENT CONTENTS

Community Profile
- Population, Income, Employment
- Special Needs Populations

Housing Needs
- Challenges
- Opportunities

Review of Housing Sites
- Current Inventory
- Newly identified sites

Housing Constraints
- Governmental
- Market

Review of Last Housing Element

Fair Housing Analysis

Goals & Objectives/ Programs & Policies

6

AFFIRMATIVELY FURTHERING FAIR HOUSING

- Disparities in Access to Opportunity
- Segregation & Integration
- Racially Concentrated Areas of Poverty & Affluence
- Disproportionate Housing Needs/Displacement Risk
- Social Equity & Environmental Justice Issues
- Fair Housing Enforcement & Outreach Capacity
- Environmental Hazards

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WHY IS THE HOUSING ELEMENT BEING UPDATED?

- Every 8 Years Required by State Law
- Updates in State Housing Laws
- Shows How City will Facilitate Housing Demand/Growth
- Allows Eligibility for State Funding for Housing
- Involves Community in Housing Planning Process

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HOUSING ELEMENT UPDATE & APPROVAL PROCESS

Community Outreach	Draft HEU to Planning Commission/ Council	Submit Draft HEU to HCD for Review	Final HEU to Planning Commission/City Council	State Certifies/Deems Compliant	Continued State Funding Eligibility
Started Spring 2022 – Continuing to Certification in 2023	Late Summer 2022	Early Fall 2022/Winter 2023	Spring 2023	May 31, 2023	

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HOW MANY HOUSING UNITS TO PLAN FOR?

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REGIONAL HOUSING NEEDS ASSESSMENT (2023-31) - MILLBRAE

Income Category	% of Area Median Income	Income Range Minimum	Income Range Maximum	RHNA Allocation Housing Units	% of Total
Extremely low/Very low income	0-50% AMI	-	$74,800	575	26%
Low income	51% - 80% AMI	$74,800	$119,680	331	16%
Moderate income	81% - 120% AMI	$121,176	$179,520	361	16%
Above moderate income	120% + AMI	$179,520	-	932	42%
Total				**2,199**	**100%**

Source: HCD 2021 Income Limits for San Mateo County, AMI =$149,600

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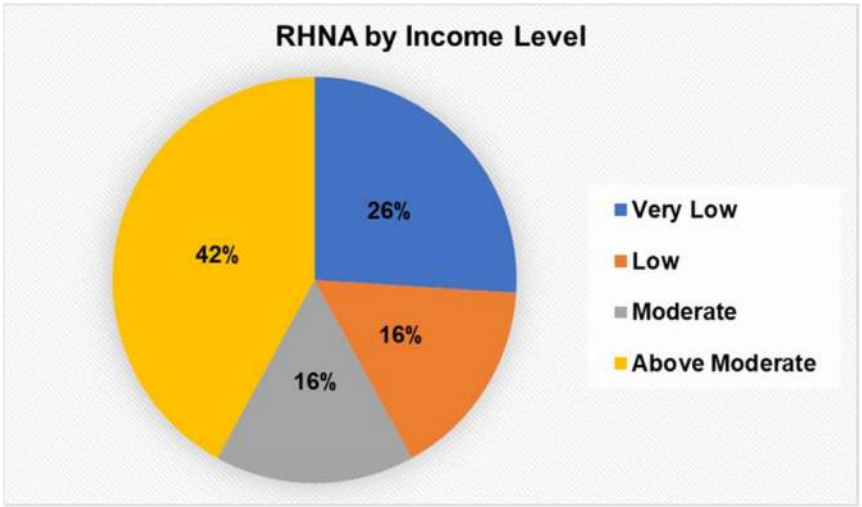

Source: Association of Bay Area Governments (ABAG) Methodology and tentative numbers were approved by ABAG's Executive board on January 21, 2021 (Resolution No. 02-2021).

REGIONAL HOUSING NEEDS ASSESSMENT (2023-31) - MILLBRAE

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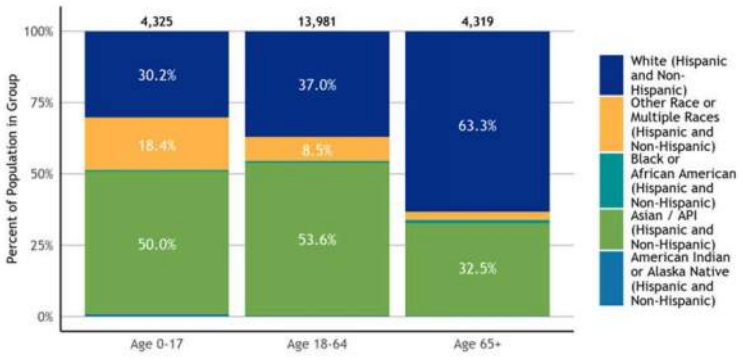
POPULATION

- Median resident age (2019) - 43 years
- People of color - 37% of seniors and 70% youth under 18

SENIOR AND YOUTH POPULATION BY RACE



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

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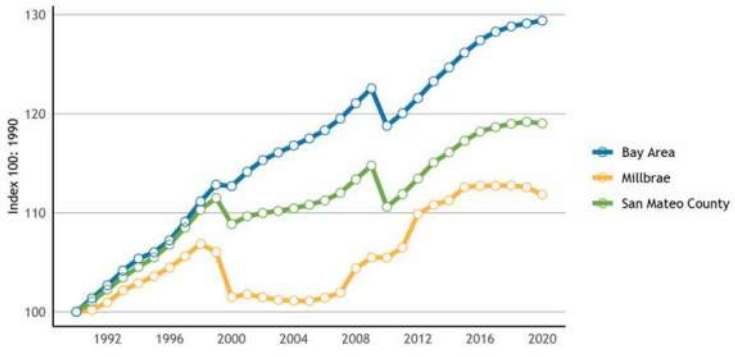
GROWTH

- Bay Area population growth & strong economy attracting new residents
- Millbrae population increased by 10% from 2000 to 2020

POPULATION GROWTH TRENDS



Source: California Department of Finance, E-5 series

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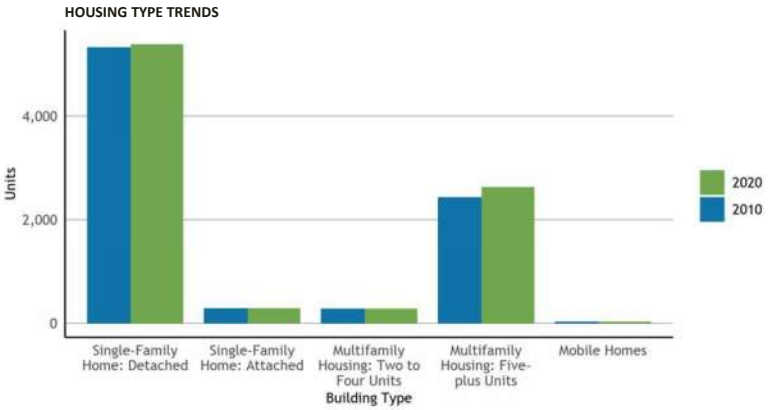
HOUSING STOCK

- 8,372 units (2020)
  - 66% Single Family
  - 34% multifamily homes
- Most growth experienced from 2010 - 2020 - Multifamily Housing 5+ Units



Source: California Department of Finance, E-5 series

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EXISTING & PROJECTED NEEDS

- Projected extremely low-income households = 288 units
- # of low-income renters > amount of affordable housing
- Black or African American residents experience highest rates of poverty, followed by Asian / API

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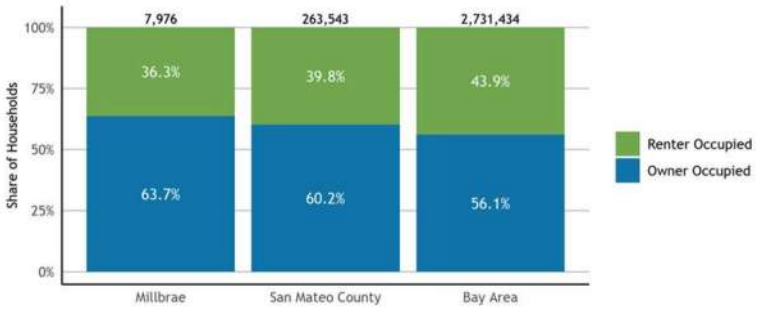
RENTERS VS. OWNERS

- 63% owner & 37% renter
- Consistent with County & Bay Area
- Millbrae has slightly higher rate of ownership vs. Bay Area



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

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HISTORICAL HOME VALUE GROWTH (SINCE 2001)

- City - 148% increase ($1.7 M)
- County - 151% increase ($1.4 M)
- Bay Area - 142% increase ($1 M)

Source: Zillow, Zillow Home Value Index (ZHVI). The ZHVI reflects the typical value for homes in the 35th to 65th percentile range. The ZHVI includes all owner-occupied housing units, including both single-family homes and condominiums.

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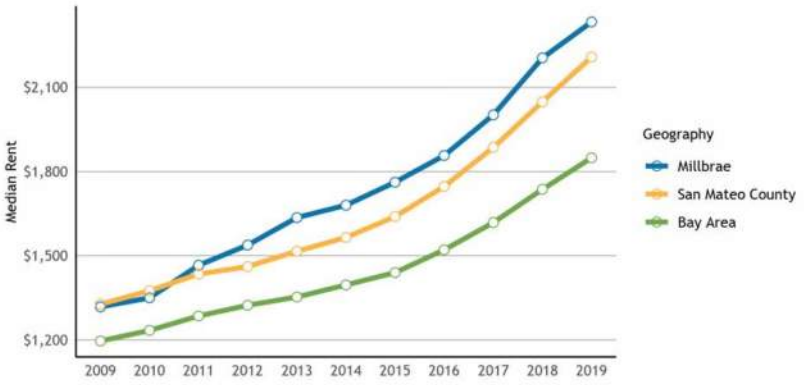
HISTORICAL RENT GROWTH (SINCE 2009)

- City - 77% increase (from $1,680 to $2,330/month)
- County - 41% increase ($1,560 to $2,200)
- Bay Area – 54% increase ($1,200 to $1,850)



Source: U.S. Census Bureau, American Community Survey 5-Year Data releases, starting with 2005-2009 through 2015-2019, B25058, B25056 (for unincorporated areas).

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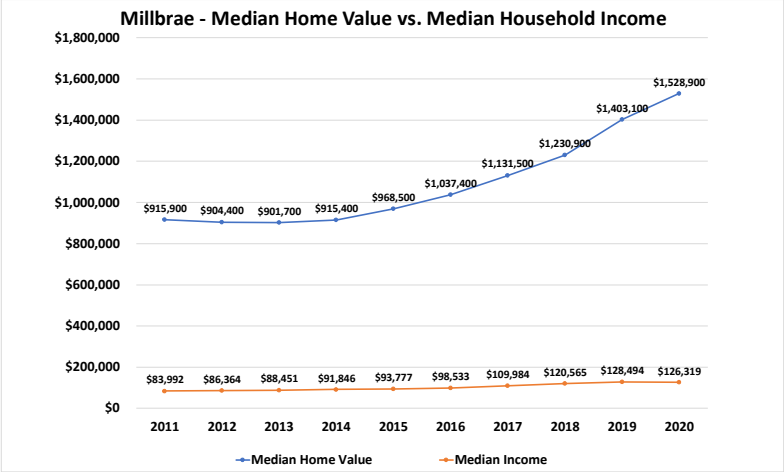
HOUSEHOLD INCOME

- City - $126,319/yr.
- Home value increased much faster than HH income.
- From 2018 to 2019, # below poverty line decreased by 3.2% , while # above poverty line increased by 2.1%

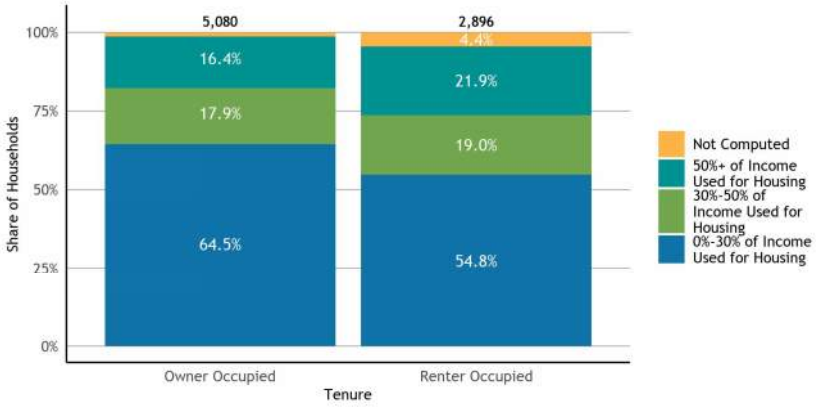


Source: U.S. Census Bureau, American Community Survey 5-Year Data releases, 2011 - 2020

20

COST BURDEN

- Spending 30-50% of Income on Housing
  - Renters & Owners are similar
  - 19% of renters
  - 18% of owners
- Severe Cost Burden (spend 50% or more of income on housing)
  - Higher % of renters
  - 22% of renters
  - 16% of owners



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

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SPECIAL HOUSING NEEDS

- LARGE HOUSEHOLDS
- SENIORS
- FEMALE-HEADED HOUSEHOLDS
- UNHOUSED
- NON-ENGLISH SPEAKERS
- PEOPLE WITH DISABILITIES
- FARMWORKERS

- 9% - disability (may require accessible housing)
- 10% - larger households with 5+ people, need larger housing units (3+ bedrooms)
- 9% - female-headed families (greater risk of housing insecurity)
- 20% - senior household incomes @ 0%-30% of AMI
  - 40% renting and 60% owner occupied
- 76% experiencing homelessness have no children
- 7% - 5 years+ identify as speaking English not well/not at all
  - Housing disruption risk - lack of understanding of rights or lack of engagement due to immigration status concerns

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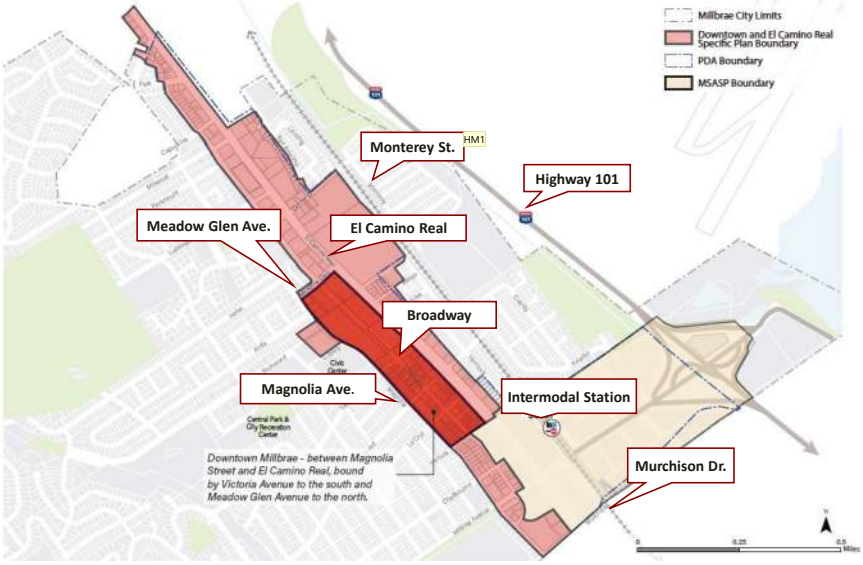
SPECIFIC PLAN & SITES



- Downtown district & El Camino Real
- Emphasizes transit-oriented, mixed-use development
- Allows for more mixed-use development near transit and jobs

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POLL QUESTIONS:

HOUSING ELEMENT UPDATE

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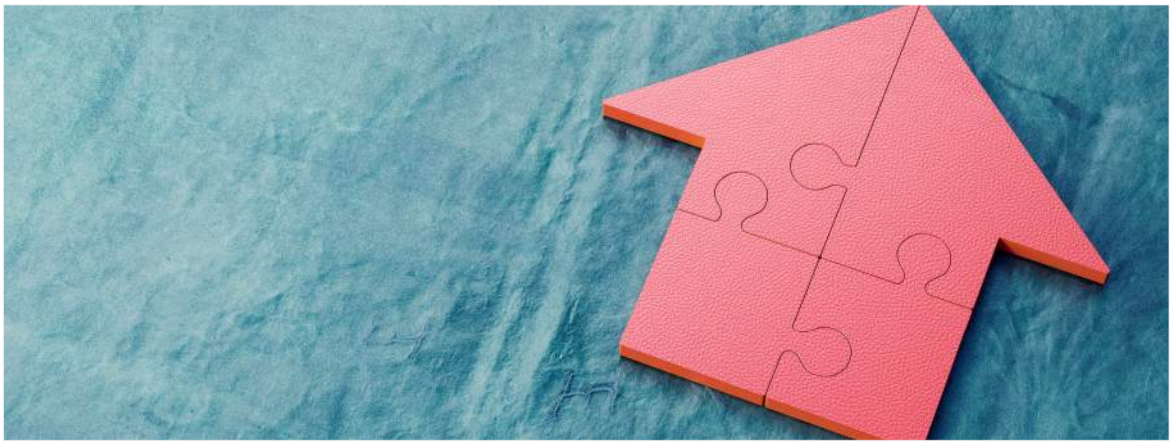

WHAT IS THE BIGGEST HOUSING ISSUE/CHALLENGE IN MILLBRAE?

- ❑ Affordability
- ❑ Lack of Housing Choices
- ❑ Commute/Access to Shopping/Services/Entertainment
- ❑ Quality/Design of Existing Housing

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WHAT TYPE OF HOUSING DOES MILLBRAE NEED THE MOST?

- ❑ Single-family Homes
- ❑ Condominiums/Townhomes
- ❑ Apartments
- ❑ Accessory Dwelling Units

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WHAT TYPES OF AFFORDABLE HOUSING ARE MOST NEEDED?

- ❑ Special Needs Housing for Large Households, Female-Headed Households, Seniors, Persons With Disabilities and/or Veterans, Farmworkers, and non-English speakers.
- ❑ More Affordable Housing Units Across the Board
- ❑ Incentives For Accessory Dwelling Units
- ❑ Updated density bonus rules
- ❑ Other (put "type" in Zoom Chat)

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WHAT AREA OF THE CITY SHOULD NEW HOUSING GO IN?

- ❑ Downtown area (Specific Plan areas/near transit & shopping districts)
- ❑ Suburban, primarily residential areas outside of central Millbrae
- ❑ Other (put "type" in Zoom Chat)

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COMMUNITY ENGAGEMENT

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21 ELEMENTS RESIDENT SURVEY FINDINGS

Housing Choices, Challenges, Needs, And Access To Economic Opportunity *(COUNTYWIDE)*

Limited supply of housing for voucher holders
Low income is a barrier to accessing housing
Nearly **4 in 10 respondents** who looked for housing experienced denial of housing
1 in 5 residents have been displaced from their home in past 5 years
HH with children displaced in past 5 years, **60% of children changed schools**
Nearly **1 in 5 residents** reported experiencing discrimination in past 5 years
Respondents reporting disability, **25% report current housing does not meet accessibility needs**
Respondents **fairly satisfied with transportation options**

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21 ELEMENTS RESIDENT SURVEY FINDINGS

Housing Choices, Challenges, Needs, And Access To Economic Opportunity *(COUNTYWIDE)*

Would like to move but can't afford it	Hispanic, renter, unreliably housed, households making less than $50,000, and large household
My house or apartment isn't big enough for my family	Hispanic households, large and single parent households, and households with children under 18
I'm often late on my rent payments	Households that make less than $25,000
I can't keep up with my utility payments	African American and Hispanic respondents, single parent households, households with children under 18, and households that make less than $50,000
Bus/rail doesn't go where I need to go or operate during times I need	African American, precariously housed, single parent households
Schools in my neighborhood are poor quality	Hispanic respondents and households with children under 18

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COMMUNITY ENGAGEMENT

Countywide Engagement to Date

- 03/21 – 05/22:
  - *Let's Talk Housing Community Meetings (Mar – May 2021)*
  - *Creating Affordable Future 4-part webinar series (Oct – Dec 2021)*
- Stakeholder Meetings
  - *Fair Housing (Sep 2021)*
  - *Housing Advocates (Oct 2021)*
  - *Builder Meeting (Nov 2021)*
  - *Service Provider Meeting (Nov 2021)*
- 21 Element Resident Survey (Apr 2021)

Outreach Methods

- Housing Element webpage
- Online Survey
- Announcements at PC & CC meetings
- PC and CC public hearings in 2022 & 2023

Stakeholder Meetings

- City staff
- Consultant
- Affordable Housing Organizations
- Affordable Housing Developers
- Market Rate Developers

** The minutes of the meetings will be available in the HE, which will be available for public reviews.*

Housing Element

This will be posted on the City's website late summer 2022 with updates until certification in 2023

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WE WANT TO HEAR FROM YOU! PLEASE COMPLETE OUR SURVEYS

- ❑ Complete Online Survey
- ❑ https://www.surveymonkey.com/r/FDMWVZW
- ❑ Please complete by July 15

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MORE INFORMATION & CONTACT US

- Visit the City's Housing Element webpages:
  - ci.millbrae.ca.us/HEU
- Provide input, suggestions & concerns
- Any & all ideas are welcome
- Email nguevara@ci.millbrae.ca.us
  - Potential sites for location of new housing
  - Properties interested in redeveloping commercial property with housing
  - Include Contact Information

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THANK YOU!

Nestor Guevara
(650) 259-2335
nguevara@ci.Millbrae.ca.us

Questions? Comments?
Visit ci.millbrae.ca.us/HEU

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Community Workshop #1 (June 30, 2022)

Workshop Minutes and Q&A

City of Millbrae
Housing Element Update

MEETING MINUTES

Name of Meeting: Housing Element Community Workshop
Date of Meeting: June 30, 2022
Time: 06:00 pm
Location: Zoom
Subject: Housing Element Update for the City of Millbrae

Attendees

Participant	Company/Agency
Roscoe Mata	City of Millbrae
Nestor Guevara	City of Millbrae
Hitta Mosesman	Harris & Associates
Irlanda Martinez	Harris & Associates
Kelly Morgan	Harris & Associates
Community Participant # 1	
Community Participant # 2	
Community Participant # 3	
Community Participant # 4	
Community Participant # 5	
Community Participant # 6	
Community Participant # 7	
Community Participant # 8	

6:05 pm – Presentation

Polling Questions

Q&A function not enabled; Consultant announced count of participant hands raised for each answer option provided for the following questions:

1. **What is the biggest housing issue/challenge in Millbrae?**
   - Affordability - 3
   - Lack of Housing Choices -1
   - Commute/Access to Shopping/Services/Entertainment -3
   - Quality/Design of Existing Housing -3

22 Executive Park, Suite 200, Irvine, CA 92614 ■ p: 949.655.3900 ■ f: 949.655.3995 ■ www.WeAreHarris.com

2. **What type of housing does Millbrae need the most?**
   - Single-family homes - 2
   - Condominiums/Townhomes - 2
   - Apartments - 2
   - Accessory Dwelling Units - 1

3. **What types of affordable housing are most needed?**
   - Special needs housing for those falling into this category - 1
   - More affordable housing units across the board – 4
   - Incentives for accessory dwelling units - 1
   - Updated density bonus rules -0
   - Other (raise hand to communicate) - 0

4. **What area of the City should new housing go in?**
   - Downtown area (specific plan areas/near transit and shopping districts) -3
   - Suburban, primarily residential areas outside of Central Millbrae -1
   - Other (raise hand to communicate) -2
     - One participant noted that they would like to indicate that the "east side of Millbrae" should NOT be considered. Additionally, the area we have identified as the downtown area of Millbrae should be relabeled as the east side of Millbrae.
     - One participant feels that all of the above options are viable. Additionally question as to if the City has city-owned property at their disposal for use? Some of the properties around schools and parks that appear abandoned might be a good option given their proximity. With the changing demographic of the city (more kids) it is important for residents at all levels to have access to these resources.

7:00 pm - Questions/Comments Forum

Q1. In the stakeholder meetings with Affordable Housing organizations, has there been discussion on partnering with non-profit groups (ex. Mercy Housing)?

- **Consultant** - We have not had the opportunity to meet with Affordable Housing Developers at this time despite numerous efforts made but continue to work towards making that happen as that is an extremely important group of people whose insight we'd like to get. We have been able to meet with service providers who work with some of the groups identified in the special needs housing category and have gotten some great feedback on fair housing and accessibility issues.
- **Participant** - Offered some assistance with putting us in touch with some non-profit groups to contact; will reach out to Nestor with the information.

Q2 Regarding the RHNA slide and the call out of 26% of very low-income level housing needed, does that percentage include any numbers from prior needs not met from the last cycle or is it indicative of needs only attributed to this cycle?

- **Consultant** - RHNA # is the need for the next 8 years and encompasses what the current need is. It should be noted that in terms of addressing any numbers due to not meeting the prior requirement, very few cities are able to meet the goal due to a number of factors (subsidies, development funding sources, etc.).
- **Participant** - Definitely concerning when looking at those numbers because how do you afford to live in the City you work if you make under $100K and there isn't housing available for you. Through out the county there have been racial covenants and discriminatory practices that have created generational wealth and afforded opportunities to some but what about those who have not been afforded the same opportunities to equitable and accessible housing based on discrimination – where does that leave them.

How do people get into the city if they have been impacted by some of these generational and systemic discriminatory practices?

- **Consultant** - Redevelopment funding used to be available to help address those issues and then when it went away in 2011 it left localities scrambling for more funding. The responsibility to address now falls at the state level. There is the Fair Housing Act that was enacted for those very concerns brought up, so the intent to address it is there but more state funding would help.
- **Participant** – Not sure where the answer lies – maybe additional money for it is somewhere in the taxes for shipping out of state for a company like Amazon or in the 1%.

Q3. When it comes to this presentation, what is going to made available for individuals who weren't able to make it to the workshop?

- **Consultant** - This presentation being used will be made available online.
- **Participant** – The concern is that when it comes to some of the language and verbiage used, non-industry people won't understand it and it then becomes a barrier to the purpose of the workshop. Can some of the language of the presentation be changed because while those attending can understand since there has been a discussion to educate and explain, anyone not in attendance and just reading the slides won't have that same benefit and ultimately not understand. Can verbiage be added to state things in a more transparent, digestible way?
- **Consultant** – Certain language/terms are used because it references state law and the City's general plan, so it is required language. In preparing for and holding these types of public events, we try to take that into consideration and explain things that might be foreign subject matter to attendees the best we can. It should be noted that all the information in more depth will be made available in the Housing Element document, which provides further explanation on the topics being discussed here.
- **Participant** – For instance, in looking at something like the RHNA numbers, is RHNA based on real needs and why are considerations made for individuals in the above moderate category who have the economic means to not experience housing barriers. What is the need for lowest level renters based on this information provided? And then for cost burden, what does that truly mean. Can verbiage be added to these slides to address these types of considerations because the reality is most people are not going to go through a bigger document and can't always attend these meetings, so making changes to something like this presentation would be more helpful because it is more digestible.
- **Consultant** – When it comes to adding or changing the slides, we are hesitant to do so as it truly does need to reference the state figures and findings for legality and accurate reporting purposes. When you're looking at the data presented, it has to be understood that this is not truly a match for match, apples to apples comparison. There are other aspects of data and things taken into account that are part of the formula but not necessarily reported up here. The data overall is meant to identify where the need for housing exists and what's presented on the slides is meant to give a snapshot of that. Regardless of other factors, state law requires the City to adhere to RHNA figures and so that shapes the way the data is presented.

  It should also be noted that workshops like these are so important because it does provide us an opportunity to help make the topic digestible given that forum allows for discussion and explanation of the subject matter. So, we highly encourage folks to attend and for anyone attending who might know someone who would be interested in learning more or benefiting from attending one of these, please encourage them to do so in the future. And this recording will be made available to the public. Admittedly this level of explanation is not easy to do in a document and so in knowing that, we will continue to make information and communication on this topic digestible and provide additional outreach opportunities.

Question 4. How can residents affect what the housing needs figures are and what the state reports as needed and can the stakeholders the consultant has reached out to be identified for transparency purposes – just so that residents know the effort being put into addressing the troubling findings?

- **Consultant** – When it comes to impacting the findings, it is advised that you contact HCD directly because they are the entity that determines the needs/figures. And regarding stakeholder identification, will defer to the City's direction on that but have to assume it would not hurt to provide that information. It should also be noted that minutes from the stakeholder meetings will be provided in the Housing Element which will be made available for public review.

Q5. Is the Specific Plan and Housing Element discussed in this presentation a roadmap or a guideline of sorts or does it actually have teeth resulting in implementations? And how are implementations tracked and what are the repercussions (if any) for not meeting the reported numbers?

- **Consultant** – This does actually have teeth. There have been some changes to state laws that have increased reporting and requirements for cities around the Housing Element – resulting in increased accountability. When it comes to repercussions the first thing to know is that HCD has a Housing Element certification deadline that cities must adhere to. Now given the changes in law and some other factors, it is rare for cities to make the deadline (SoCal cities only had 6 and NorCal will likely not have the majority of cities make the deadline) so the state is more flexible on this, but it does help with accountability.

  There is an annual progress report that City's must complete that documents progress on status of units built and programs implemented. HCD will look and compare what was required to what has been built on a year-by-year basis and if the City has not made enough progress, they go on what is referred to as a "naughty list". Developers have access to this list and so If you're a city on this list, developers have more streamlined development and you as the city lose some control over the development process – so that is one example of where it's become very important to try and meet these requirements. Almost every city and county are on that list though just due to the external factors that might impact the ability to get housing built.

  When it comes to a city actually being able to meet the allocated unit numbers, the state is more flexible with repercussions on that as well because it has to take into account the fact that there are market factors outside of a City's control (labor, supply shortage, developer interest) that impact their ability to be successful in reaching their numbers. The state will however hold cities and counties accountable for not showing action has been taken on what they identified in their submitted housing elements – basically you must show that you have tried to make progress. Repercussion for a lack of this can include imposing fines and filing a lawsuit against the city or county. The goal of the state is to make sure first and foremost that if a city or county is having issues meeting their numbers, they have been educated on how to make progress, and then follow up from there.

Q6. When will the presentation and recording be made available on the City's website?

- **City staff** – tomorrow morning for the presentation and the recording TBD
- **Participant** – Can the presentation also be translated into other languages. Some of the ones that would benefit based on individuals not able to make it but that might find this informative include Spanish, Arabic, Mandarin, and Tagalog.
- **Consultant** – We will look into addressing this with the City.

No additional questions presented.

Closing sentiments - There are a lot of factors at play when it comes to housing. The Housing Element provides the best effort to plan for housing in the most effective way that will provide the most success.

7:36 - Meeting wrapped

*Participants were informed that there will be additional opportunities to join public meetings regarding the City's Housing Element Update before it is finalized and certified and to please consider attending (as well as encourage others to attend) as it is a great opportunity to not only learn more about what can be a complicated topic, but to also make your voice heard.

Community Workshop #1 (June 30, 2022)

Archived Meeting Items

Housing Element Update

What is a Housing Element?

The Housing Element is a core element of the City's General Plan. The General Plan is a long-range plan that guides decision- making and establishes rules and standards for new development and city improvements. It reflects the community vision for the future and is intended to provide direction through the year 2040.

The key components of the Housing Element include:

- A community demographic profile and analysis of population growth and trends.
- A list of available land suitable for housing development.
- An evaluation of local constraints or barriers to housing development as well as opportunities to develop housing.
- Housing goals, programs, policies, and resources for improving and creating housing within the City.

What is the Process?

The City of Millbrae initiated work on the 2023-2031 Housing Element of the General Plan to address the existing and projected future housing needs of the City. Local governments are required by California State law to adequately plan for the housing needs of everyone in the community. To do so, local governments adopt housing elements that provide plans, programs, and regulatory systems to create opportunities for housing.

This update is for the 6th Cycle Housing Element which will cover the eight-year planning period from 2023-2031 for the City. The previous 5th Cycle Housing Element covers the planning period from 2015 - 2023.

Get involved and make your voice heard

We need to hear from you to help ensure that the updated Housing Element reflects the priorities of our community. There are several ways to make your voice heard:

- Share your opinions in the Housing Element survey, available here.
- The City held a virtual public workshop on Thursday, June 30, 2022. The workshop introduced the element, and allowed staff to receive input on potential policies and programs.
- If you would like to sign up for updates, please email nguevara@ci.millbrae.ca.us to be added to our interest list.
- After the draft Housing Element is prepared, there will be opportunities to comment on the draft document and attend public hearings for adoption.

Community Workshop

The City held a virtual public workshop on Thursday, June 30, 2022. The workshop introduced the element, presented a community profile, include live polling on housing needs, challenges, and issues, and staff received input on potential policies and programs.

- The full meeting video can be viewed here.
- The presentation slides can be viewed here.

Housing Element FAQs

Why update the Housing Element?

California State law requires that local jurisdictions update the Housing Element every eight years. These frequent updates are required because housing is critical to ensure economic prosperity and quality of life in our region. This Housing Element update is an opportunity to evaluate the previous element and determine which parts have been effective and which should be improved. It also provides an opportunity for residents to get involved and

Community Workshop: 6th Cycle Housing Element Update, June 30, 2022

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AFFORDABLE HOUSING SERVICE PROVIDER STAKEHOLDER MEETING (JUNE 29, 2022)

- Invitations
- Meeting Agenda
- Meeting Minutes

Affordable Housing Service Provider Stakeholder Meeting # 1 (June 29, 2022)

Invitations

Stakeholder Meetings

Provided below is a table showing the companies/organizations who were invited to participate in the City's stakeholder meetings pertaining to the Housing Element Update. The table identifies the type of entity (Affordable Housing Developer, Architect, Market rate Developer, Affordable Housing Service Provider) as well as who participated in the process.

Invited	Participated
Affordable Housing Developers	
1301 Broadway Development	No
Sand Hill Property Company	No
Affirmed Housing	No
BRIDGE Housing	No
Eden Housing	No
Habitat for Humanity— Greater SF	Yes
HIP Housing	No
Housing Choices	Yes
Mercy Housing	No
MidPen Housing	No
The Core Companies	Yes
Architects	
Architecture International, Ltd. - 150 Serra	No
DB Architects - 130-140 El Camino Real	No
HOK - 150 Serra	No
Market Rate Developers	
130-140 El Camino Real	No
Anton Development	No
Greystar	Yes
Muzzi Developments	Yes
Republic Urban	No
Sand Hill Property Company	No
Sares | Regis	No
Summerhill Apartment Communities	Yes
Trammell Crow	Yes
Affordable Housing Service Providers	
Ayudando Lations A Soñar (ALAS)	No
Center for Independence of Individuals with Disabilities	Yes
Community Legal Services in East Palo Alto (CLSEPA)	No
El Comite de Vecinos del Lado Oeste (El Comite)	No
EPACANDO	No
Faith in Action	No
Greenbelt Alliance	No
HEART of San Mateo County	No
Home for All	No
Housing Authority of San Mateo County	No
Housing Equality Law Project	No
Housing Leadership Council	No
Legal Aid for San Mateo County	No
Lifemoves	No
Menlo Together	No
Nuestra Casa	No
One San Mateo	No
Peninsula for Everyone	No
Project Sentinel	Yes
Public Interest Law Project	No
Puente de la Costa Sur	No
Root Policy Research	No
San Mateo County Association of Realtors	No
San Mateo County Central Labor Council	No
San Mateo County Health	No
Self-Help for the Elderly San Mateo County	No
Youth Leadership Institute	No
Youth United for Community Action	No

From: Kelly Morgan
Sent: Wednesday, June 22, 2022 1:35 PM
To: [redacted]
Cc: Hitta Mosesman <Hitta.Mosesman@weareharris.com>; Irlanda Martinez <Irlanda.Martinez@weareharris.com>
Subject: City of Millbrae Housing Element - Affordable Housing Developer and Community Organization Input

Good afternoon,

I am contacting you on behalf of the City of Millbrae. The City is currently working on their Housing Element Update and believe that input from affordable housing developers and community organizations in the region is critical to developing goals, policies, and programs to provide expanded affordable housing. We would really appreciate an hour of your time to get some input on things the City can do to encourage and facilitate affordable housing.

Due to the pandemic, we are proposing a virtual meeting. Please let us know (no later than Monday, 6/27) if you would be available to participate next week by using our doodle poll at the below link:

https://doodle.com/meeting/participate/id/dGZWMMKb

This meeting would give you the opportunity to share your ideas on the barriers and possible incentives for building affordable housing.

We appreciate your time on this and hope we can help foster collaboration between the City of Millbrae, affordable housing developers, and local community organizations to help address the City's affordable housing needs.

Thank you,

Kelly Morgan (she/her/hers)
Deputy Project Manager
Community Development + Housing Consulting
Harris & Associates
22 Executive Park, Suite 200
Irvine, CA 92614
C: 562.230.0576 | W: 949.655.3900
www.WeAreHarris.com

Affordable Housing Service Provider Stakeholder Meeting # 1 (June 29, 2022)

Meeting Agenda

City of Millbrae
Housing Element Update

AGENDA

Name of Meeting:	Affordable Housing Developers and Community Organizations Stakeholder Meeting
Date of Meeting:	June 29, 2022
Time:	1-2 PM PST
Location:	Zoom Meeting
Subject:	Housing Element Update - Challenges & Opportunities
Distribution:	Email
Date issued:	June 29, 2022

Purpose of Meeting: Obtain Input from Affordable Housing Developers and Community Organizations on the City's Regional Housing Needs Allocation (RHNA)

6th Cycle Housing Element Update – Overview (Harris & Associates)

Solutions to Meet RHNA (All)

a. In your experience, what is the biggest housing need in Millbrae?

b. What is the range of income levels of the population you serve?

c. Have you encountered any programs, procedures, or incentives in other cities that have significantly facilitated housing development?

d. Do affordable units need to be designed in a certain way or certain size to meet the needs of the people you serve?

e. Aside from more money, what can jurisdictions do to be helpful? Future programs and policies not just about the direct allocation of money? Any creative housing solutions that would help a city like Millbrae develop more housing/ affordable housing?

f. Do you work with or know of a church that might be interested in developing housing (per recently passed SB 1851)?

g. What other available state programs or legislation could Millbrae focus on in terms of developing affordable housing?

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h. How important is proximity to transportation for the residents you serve?

i. Are you aware of any programs or incentives to build around major transportation areas such as BART stops?

Attachment:

1. City of Millbrae 6th Cycle Draft RHNA Numbers (from ABAG)

Attachment 1

Draft 6th Cycle RHNA Numbers from ABAG

Income Category (% of County Area Median Income (AMI))	Units
Extremely Low / Very Low (0% - 50% AMI)	575
Low (51% - 80% AMI)	331
Moderate (81% - 120% AMI)	361
Above Moderate (120% AMI or above, which is considered market rate)	932
TOTAL	**2,199**

Affordable Housing Service Provider Stakeholder Meeting # 1 (June 29, 2022)

Meeting Minutes

City of Millbrae
Housing Element Update

MEETING MINUTES

Name of Meeting: Affordable Housing Service Provider Input
Date of Meeting: June 29, 2022
Time: 01:00 pm
Location: Zoom
Subject: Affordable Housing Development in the City of Millbrae

Attendees

Participant	Company/Agency
Roscoe Mata	City of Millbrae
Nestor Guevara	City of Millbrae
Hitta Mosesman	Harris & Associates
Irlanda Martinez	Harris & Associates
Kelly Morgan	Harris & Associates
Service Provider #1	
Service Provider #2	
Service Provider #3	

Housing Needs

- Extremely low/low income housing the biggest need per past callers and cases in Millbrae
- Accessible housing needed - not enough units so they have to ask for modifications that they have to pay for since not enough federal funding, or they are very uncomfortable.
- Visit ability housing - 1 zero step entrance w/ 32" door width and wheelchair accessibility bathroom on main level (MF units don't usually have all of these). https://visitability.org/ First floor units are a good way to fulfill this.
- Reasonable accommodation and then reasonable modification. Modification is physical modification.
- Housing for families with housing - lots of efficiencies & 1 bedrooms, but not enough 2- & 3-bedroom units. There are quite a few fair housing cases involving familial status.
- Units for seniors (especially extremely low with a voucher)
- HUD doesn't make up for market rate - doesn't understand how high rents are (this is a HUGE issue)
- Education needed for voucher holders/property owners

Income Levels Served

- Extremely Low/Low (majority) & some Moderate Income

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Programs Needed - more affordable housing or fair housing services

- Source of income violations/vouchers
- The Kelsey - works on inclusive design and affordable accessible housing
- Modifications funding program (maybe City could pursue a grant - Santa Clara has a grant)
- CID has a program for modifications - funding from HUD to individual cities (ramps, grab bars, etc.)
- Put the organizations info or links on City's website

Transportation

- Affordable housing near public transit-oriented housing, near BART & bus stops (high frequency), is VERY important.
- Especially along El Camino Real

* Follow up questions should be sent to Kelly Morgan.

**Participants were informed of the upcoming public workshop regarding the City's Housing Element Update including how to attend.

MARKET RATE DEVELOPER STAKEHOLDER MEETING # 1 (JUNE 30, 2022)

- Invitations
- Meeting Agenda
- Meeting Minutes
- Additional Participant Outreach

Market Rate Developer Stakeholder Meeting # 1 (June 30, 2022)

Invitations

Stakeholder Meetings

Provided below is a table showing the companies/organizations who were invited to participate in the City's stakeholder meetings pertaining to the Housing Element Update. The table identifies the type of entity (Affordable Housing Developer, Architect, Market rate Developer, Affordable Housing Service Provider) as well as who participated in the process.

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Affordable Housing Developers	
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Affirmed Housing	No
BRIDGE Housing	No
Eden Housing	No
Habitat for Humanity— Greater SF	Yes
HIP Housing	No
Housing Choices	Yes
Mercy Housing	No
MidPen Housing	No
The Core Companies	Yes
Architects	
Architecture International, Ltd. - 150 Serra	No
DB Architects - 130-140 El Camino Real	No
HOK - 150 Serra	No
Market Rate Developers	
130-140 El Camino Real	No
Anton Development	No
Greystar	Yes
Muzzi Developments	Yes
Republic Urban	No
Sand Hill Property Company	No
Sares | Regis	No
Summerhill Apartment Communities	Yes
Trammell Crow	Yes
Affordable Housing Service Providers	
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EPACANDO	No
Faith in Action	No
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HEART of San Mateo County	No
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Housing Authority of San Mateo County	No
Housing Equality Law Project	No
Housing Leadership Council	No
Legal Aid for San Mateo County	No
Lifemoves	No
Menlo Together	No
Nuestra Casa	No
One San Mateo	No
Peninsula for Everyone	No
Project Sentinel	Yes
Public Interest Law Project	No
Puente de la Costa Sur	No
Root Policy Research	No
San Mateo County Association of Realtors	No
San Mateo County Central Labor Council	No
San Mateo County Health	No
Self-Help for the Elderly San Mateo County	No
Youth Leadership Institute	No
Youth United for Community Action	No

From: Kelly Morgan
To: [redacted]
Cc: Irlanda Martinez; Hitta Mosesman; RMata@ci.millbrae.ca.us; DSmith@ci.millbrae.ca.us; NGuevara@ci.millbrae.ca.us
Subject: City of Millbrae Housing Element - Market Rate Developer Input
Date: Wednesday, June 22, 2022 2:57:00 PM
Attachments: image001.png

Good afternoon,

I am contacting you on behalf of the City of Millbrae. The City is currently working on their Housing Element Update and believe that input from developers in the region is critical to developing goals, policies, and programs to provide expanded housing. We would really appreciate an hour of your time to get some input on things the City can do to encourage and facilitate housing development.

Due to the pandemic, we are proposing a virtual meeting. Please let us know (no later than Monday, 6/27) if you would be available to participate next week by using our doodle poll at the below link:
-
https://doodle.com/meeting/participate/id/elOE796d

This meeting would give you the opportunity to share your ideas on the barriers and possible incentives for building housing.

We appreciate your time on this and hope we can help foster collaboration between the City of Millbrae and local developers to help address the City's housing needs.

Thank you,

Kelly Morgan (she/her/hers)
Deputy Project Manager
Community Development + Housing Consulting
Harris & Associates
22 Executive Park, Suite 200
Irvine, CA 92614
C: 562.230.0576 | W: 949.655.3900
www.WeAreHarris.com

Market Rate Developer Stakeholder Meeting # 1 (June 30, 2022)

Meeting Agenda

City of Millbrae
Housing Element Update

AGENDA

Name of Meeting:	Market Rate Developer Stakeholder Meeting
Date of Meeting:	June 30, 2022
Time:	3:30 – 4:30 PM PST
Location:	Zoom Meeting
Subject:	Housing Element Update - Challenges & Opportunities
Distribution:	Email
Date issued:	June 29, 2022

Purpose of Meeting: Obtain Input from Market Rate Developers on the City's Regional Housing Needs Allocation (RHNA)

6th Cycle Housing Element Update – Overview (Harris & Associates)

Solutions to Meet RHNA (All)

a. What are some challenges and opportunities you face as a developer while trying to develop housing in a community like Millbrae?

b. What would you say are the 3 most important things that jurisdictions can provide in order to facilitate housing development in their jurisdiction?

c. What are ways that you think jurisdictions could facilitate the development of moderate and middle-income housing?

d. What should jurisdictions be aware of as they designate sites for housing, including multi-family housing?

e. How does developing mixed use developments affect housing? How does it affect competing land uses?

f. Where / under what conditions do you see opportunities for commercial (including parking lots) to residential conversions? What programs or policies do you believe would encourage such conversions?

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g. What are the densities that are working best for housing projects that cities should be planning for in the Housing Element process?

h. Is there a range of project densities or size that is your sweet spot?

i. Have you encountered any programs, procedures, or incentives in other cities that have significantly facilitated housing development?

j. Are there any constraints with obtaining loans (construction and/or permanent) for a project in Millbrae?

k. What types of streamlining can the City do to incentivize affordable housing projects?

l. Have you considered a project in Millbrae or San Mateo County within the last 3 years? Why or why not?

m. In your opinion, what are some creative housing solutions that would help a city like Millbrae develop more housing/ affordable housing?

n. What are new policies or improved policies that you think would go farthest to making it easier to develop infill housing?

Attachment:

1. City of Millbrae 6th Cycle Draft RHNA Numbers (from ABAG)

Attachment 1

Draft 6th Cycle RHNA Numbers from ABAG

Income Category (% of County Area Median Income (AMI))	Units
Extremely Low / Very Low (0% - 50% AMI)	575
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Above Moderate (120% AMI or above, which is considered market rate)	932
TOTAL	**2,199**

Market Rate Developer Stakeholder Meeting # 1 (June 30, 2022)

Meeting Minutes

City of Millbrae
Housing Element Update

MEETING MINUTES

Name of Meeting: Market Rate Housing Developer Input
Date of Meeting: June 30, 2022
Time: 03:30 pm
Location: Zoom
Subject: Affordable Housing Development in the City of Millbrae

Attendees

Participant	Company/Agency
Nestor Guevara	City of Millbrae
Hitta Mosesman	Harris & Associates
Irlanda Martinez	Harris & Associates
Market Rate Developer # 1	
Market Rate Developer # 2	
Market Rate Developer # 3	

Developer Challenges/Opportunities - for a city like Millbrae

- Shallow parcel sizes and shallow parcel depths in Millbrae are a struggle for developers.
- Should look at it in the sense of density - If you can get up to a 150 units per acre on a parcel, you might get townhomes. Anything below that probably won't result in any high density.
- Shallow depth lot could be conducive of building townhomes but since they are on El Camino, which is mostly commercial, there is no dead zone, so it would be difficult to build townhomes there.
- Considerations of parking lots near retail centers might be useful for this kind of development - but there are a lot of utilities that run under those, which could limit the development of high-density housing. And despite Government Code requiring jurisdictions to build affordable housing, which for Millbrae this makes up about 60% of it with the state requiring that the zoning for affordable housing sites (0-80% AMI) have a minimum density of 30 units per acre, it's still not very dense.

Provisions to help facilitate housing development in jurisdictions

- When it is within a city's powers, clear CEQA requirements.
- Millbrae has adopted an affordable housing requirement and significant development fees. Millbrae's fees are some of the highest in the area. Everything pays the same fees in Millbrae. School fees are ~$65,000 per unit. Other jurisdictions have adopted credits for affordable housing projects so something to consider.

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- Parking drives density. Parking requirement reductions would help since parking drives density.

Provisions to help facilitate the development of moderate and middle-income housing

- Duplexes, Quadplexes could be accommodated in the City of Millbrae.
- Consider density. 150 units per acre or more can get you townhomes.

Considerations for designating sites for housing, including multi-family housing

- Find out if the City/County has land available within the City's boundaries.
- Smaller sites with high density would be a good site. Something a market-rate developer wouldn't be able to build in (~60 units in the lot).

Mixed Use Development impact on housing and competing land uses

- The City is adopting a specific plan in the downtown area with a very heavy emphasis on mixed-use.
- Typically builds mixed-use but in the context of the Specific Plan, what is concerning is that if you are requiring mixed-use in the shallower parcels, it will defeat the purpose of the height.
- A lot of retailers have depth requirements as well, so it really limits the housing part.
- There should be thought about what the point of the first-floor retail is – is it great retail? Is it ground floor activation? If it's ground floor activation, the building's amenities could serve as a way to activate the ground floor, rather than having to add commercial.

Opportunities for commercial (including parking lots) to residential conversions and programs /policies to encourage such conversions

- A lot of the properties that are zoned commercial don't allow residential. An overlay would help.

Densities that are successful for housing projects that cities should be planning for in the Housing Element process

- What is typically getting built along the Peninsula is podium with below-grade parking. Projects with 10-12 stories are much more expensive since they need to be built with concrete at the bottom - podiums with 7-8 stories pencil well in Millbrae.
- Type I does not (towers) pencil well in the City - housing is getting beat out by life sciences. Constrain uses that outcompete housing, such as life science.
- 100-150 units per acre would be good densities

Project density range/size that is most successful

- In thinking of what the minimum lot need might be - 1.5 acres given prior work with planning staff on the "missing middle" type of housing. 130 units per acre and 6-7 stories.
- There is a density and height (Wouldn't develop at 60 units per acre, no matter what it is).
- Greystar does not do low density ownership either. They focus on high-density developments because they generate more revenue. There are limitations in wood construction because you cannot go over 85 feet. When you zone for 120 ft. in height, you will get proposals for 75-85 because over 85 becomes expensive and not worth it if you can't build a lot of density.

Knowledge of programs, procedures, or incentives in other cities that have significantly facilitated housing development

- Oakland/Santa Clara have used their specific plans to clear CEQA requirements.
- Plainville provides incentives for affordable housing development.
- Burlingame parking ratios were reduced (1.25).

- Look at open space requirements as these can really impact how housing is built. For example, Santa Clara has very large open space fees.
- Look at what Burlingame is doing that Millbrae isn't. San Francisco is looking at fee delays. Millbrae does allow for late fees but increases the fees as time goes on. Other cities lock in their fee amount when you submit applications.

Have you considered working Millbrae or San Mateo County within the last 3 years? Why or why not?

- Have not worked in Millbrae before although have tried and the planning staff has been great. The desire to work in Millbrae is there but have had no successful attempts. Have worked with South City and San Bruno - Millbrae is the only city to the North that they have not worked with yet.

What are new policies or improved policies that you think would go farthest to making it easier to develop infill housing?

- A by-right pathway where you don't have discretionary review is a big help. CEQA is a part of this but can be dealt with a specific plan. A by-right pathway is probably more important.

* Follow up questions should be sent to Kelly Morgan.

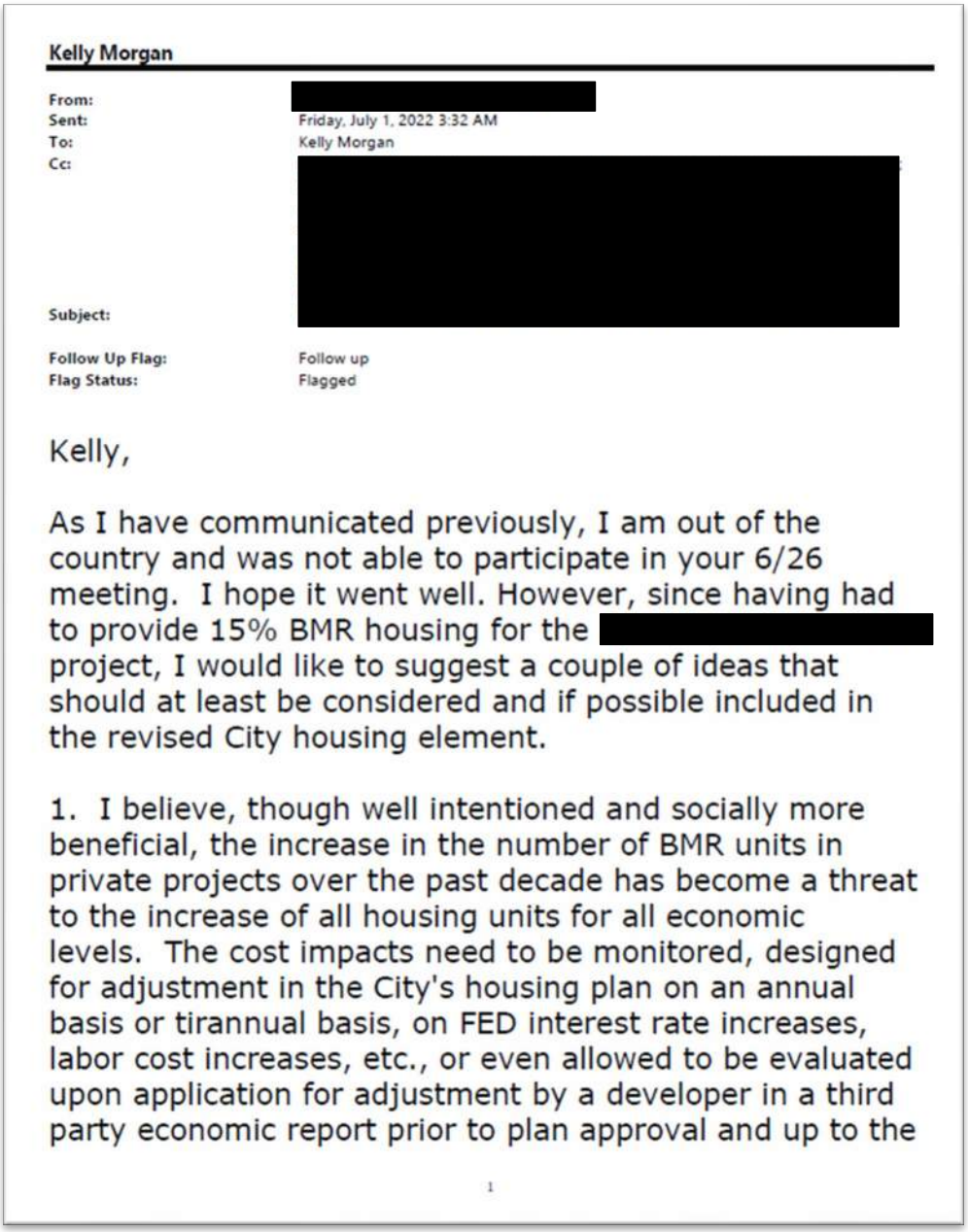
**Participants were informed of the upcoming public workshop regarding the City's Housing Element Update including how to attend.

Market Rate Developer Stakeholder Meeting # 1 (June 30, 2022)

Additional Participant Outreach

City of Millbrae
Housing Element Update – Market Rate Developer
Individual input received via email

* It should be noted that the below comments were provided via an email received from a market rate developer who was unable to participate in the Market Rate Developer Input stakeholder meeting.



Kelly Morgan

From: [redacted]
Sent: Friday, July 1, 2022 3:32 AM
To: Kelly Morgan
Cc: [redacted]
Subject: [redacted]
Follow Up Flag: Follow up
Flag Status: Flagged

Kelly,

As I have communicated previously, I am out of the country and was not able to participate in your 6/26 meeting. I hope it went well. However, since having had to provide 15% BMR housing for the [redacted] project, I would like to suggest a couple of ideas that should at least be considered and if possible included in the revised City housing element.

1. I believe, though well intentioned and socially more beneficial, the increase in the number of BMR units in private projects over the past decade has become a threat to the increase of all housing units for all economic levels. The cost impacts need to be monitored, designed for adjustment in the City's housing plan on an annual basis or tirannual basis, on FED interest rate increases, labor cost increases, etc., or even allowed to be evaluated upon application for adjustment by a developer in a third party economic report prior to plan approval and up to the

1

22 Executive Park, Suite 200, Irvine, CA 92614 ■ p: 949.655.3900 ■ f: 949.655.3995 ■ www.WeAreHarris.com

issuance of building permit when construction costs and constraints are actually known. Providing such a mechanism in the Housing Plan would be a safety valve to get approved projects built with a defined legal means for the City to recognize economic concessions that might otherwise be challenged as gifts to developers. If the ultimate goal is to provide a broad spectrum of housing affordable to various income levels. While the council and planners may "feel" great in having added a higher percentage or required a few more "affordable units" to project under the current or updated housing plan the costs of construction of every unit is impacted and needs to be understood and reasonably adjusted by the City for in the requirements of the market place over the life of the plan or the plan will be either short lived or DOA.

In addition, BMR requirements are in place in Millbrae and many communities or under state rules that require the payment of union wages and every City fee and all exactions as though the entire project were market rate. While this "civic ideal" of having the "new pay their way at no cost to the rest of the existing community" sounds great and works in a very low interest, lower cost environment, that has been changing and is everyday reported about to change big time with interest rate increases, cost inflation, and the Bay Area's inplace higher contract labor costs. This distortion is already putting increasing pressure on developers who can't make the numbers pencil or view the current market risk at completion as unacceptable causing needed housing to be delayed, cut back or more cheaply built. The Fed's announced increase in interest rates, increases in the CPI,

lack of low cost labor in the Bay Area from the market highs of the past decade are about to compress margins even more making housing projects economically infeasible and unbankable. So, the City needs the housing element to have a way to evaluate BMR requirements in projects beyond fixed percentages that allow for a more elastic program that will allow the plan to adjust for the coming and perennial changes that really affect projects getting built, or the City might find that their wonderful numbers they project to comply with the State's mandates become unachievable because the slowdown in housing construction will turn into a full stop.

2. Everytime a BMR rental unit is allocated to a qualified person the status is for an unlimited period of time as long as they "still qualify" economically, and I understand and can appreciate that probably most who qualify and continue to qualify should continue to receive a BMR benefit, but I also think that the unlimited occupancy now prevalent discourages any pressure for upward mobility and encourages opportunities to game the system: i.e, unreported income of the primary BMR named on the rental, unreported income of an unreported co-tenant or relative, etc. I believe these are very hard to monitor and will be more so going forward with the scattered 10%-15% distribution of BMR units within otherwise market rate projects. I know that there are qualified and experienced entities: SMC Housing Authority, MidPeninsula, Bridge, etc. that have big projects of their own and that do and will continue to try to do a good job, but the way the BMR programs are now rolled out, project by project is going to consume a lot of resources and personnel going forward.

3

Finally, I believe that it would help if winning the lottery of a BMR unit had a hard time line end to allow other persons who may qualify an opportunity to a given unit, to encourage existing BMR tenants to move on and to have a paced way of really assessing the occupant qualification more thoroughly. I don't know if 10 years or 20 years is reasonable, but I sure think that allowing it to run 55 years for one individual and/or one family undermines the incentive to "move-up and out" to allow someone else an opportunity.

I realize that the above issues are not all or even completely in the control of the City or what a housing plan is currently designed to do and that there are many other competing regulatory factors at play that limit what can be done. However, I ask that you think about these items to improve the implementation, fairness, ongoing application of the plan while looking to make real the long run community and individual citizens benefits from the new housing element.

Sincerely,

[redacted]

On Tue, Jun 28, 2022 at 12:57 PM Kelly Morgan <Kelly.Morgan@weareharris.com> wrote:

> Hi everyone,
>
> I wanted to follow up one last time in case anyone wants to join the City in a conversation about the City's Housing Element Update and its housing goals, policies, and programs to provide expanded housing. Please note I have added an additional date/time option to those previously provided. If you would like to attend, please provide your availability by 6:00 pm this evening using the below link:
>
> https://doodle.com/meeting/participate/id/elOE796d

4

AFFORDABLE HOUSING SERVICE PROVIDER STAKEHOLDER MEETING # 2 (JULY 8, 2022)

- Invitations
- Meeting Agenda
- Meeting Minutes

Affordable Housing Service Provider Stakeholder Meeting # 2 (July 8, 2022)

Invitations

Stakeholder Meetings

Provided below is a table showing the companies/organizations who were invited to participate in the City's stakeholder meetings pertaining to the Housing Element Update. The table identifies the type of entity (Affordable Housing Developer, Architect, Market rate Developer, Affordable Housing Service Provider) as well as who participated in the process.

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BRIDGE Housing	No
Eden Housing	No
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HIP Housing	No
Housing Choices	Yes
Mercy Housing	No
MidPen Housing	No
The Core Companies	Yes
Architects	
Architecture International, Ltd. - 150 Serra	No
DB Architects - 130-140 El Camino Real	No
HOK - 150 Serra	No
Market Rate Developers	
130-140 El Camino Real	No
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Greystar	Yes
Muzzi Developments	Yes
Republic Urban	No
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Root Policy Research	No
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San Mateo County Central Labor Council	No
San Mateo County Health	No
Self-Help for the Elderly San Mateo County	No
Youth Leadership Institute	No
Youth United for Community Action	No

From: Kelly Morgan
To: [redacted]
Cc: Hitta Mosesman; Irlanda Martinez; Nestor Guevara; Roscoe Mata; Darcy Smith
Subject: City of Millbrae Housing Element - Affordable Housing Service Provider input
Date: Friday, July 1, 2022 2:09:00 PM
Attachments: image001.png

Good afternoon,

As you may already be aware based on prior communications, the City is currently working on their Housing Element Update and believe that input from affordable housing service providers like you is critical to developing goals, policies, and programs to provide expanded affordable housing. We would greatly appreciate an hour of your time to get some input on what you feel the City can do to encourage and facilitate affordable housing.

We have added a few more dates for meeting availability – found at the doodle poll link below. Please let us know if you might be available to participate in a virtual meeting sometime next week or the following by indicating meeting date/time preference at the link below:
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https://doodle.com/meeting/participate/id/bmwVvPne

This meeting would give you the opportunity to share your ideas on the barriers and possible incentives for building affordable housing.

We appreciate your time on this and hope we can help foster collaboration between the City of Millbrae and affordable housing service providers to help address the City's affordable housing needs.

Thank you,

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Deputy Project Manager
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Affordable Housing Service Provider Stakeholder Meeting #2 (July 8, 2022)

Meeting Agenda

City of Millbrae
Housing Element Update

AGENDA

Name of Meeting:	Affordable Housing Service Provider Stakeholder Meeting
Date of Meeting:	July 8, 2022
Time:	9:30 AM - 10:30 AM PST
Location:	Zoom Meeting
Subject:	Housing Element Update - Challenges & Opportunities
Distribution:	Email
Date issued:	July 7, 2022

Purpose of Meeting: Obtain Input from Affordable Housing Service Providers on the City's Regional Housing Needs Allocation (RHNA)

6th Cycle Housing Element Update – Overview (Harris & Associates)

Solutions to Meet RHNA (All)

a. In your experience, what is the biggest housing need in Millbrae?

b. What is the range of income levels of the population you serve?

c. Have you encountered any programs, procedures, or incentives in other cities that have significantly facilitated housing development?

d. Do affordable units need to be designed in a certain way or certain size to meet the needs of the people you serve?

e. Aside from more money, what can jurisdictions do to be helpful? Future programs and policies not just about the direct allocation of money? Any creative housing solutions that would help a city like Millbrae develop more housing/ affordable housing?

f. Do you work with or know of a church that might be interested in developing housing (per recently passed SB 1851)?

g. What other available state programs or legislation could Millbrae focus on in terms of developing affordable housing?

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h. How important is proximity to transportation for the residents you serve?

i. Are you aware of any programs or incentives to build around major transportation areas such as BART stops?

Attachment:

1. City of Millbrae 6th Cycle Draft RHNA Numbers (from ABAG)

Attachment 1

Draft 6th Cycle RHNA Numbers from ABAG

Income Category (% of County Area Median Income (AMI))	Units
Extremely Low / Very Low (0% - 50% AMI)	575
Low (51% - 80% AMI)	331
Moderate (81% - 120% AMI)	361
Above Moderate (120% AMI or above, which is considered market rate)	932
TOTAL	**2,199**

Affordable Housing Service Provider Stakeholder Meeting # 2 (July 8, 2022)

Meeting Minutes

City of Millbrae
Housing Element Update

MEETING MINUTES

Name of Meeting: Affordable Housing Service Provider Input
Date of Meeting: July 8, 2022
Time: 09:30 am
Location: Zoom
Subject: Affordable Housing Development in the City of Millbrae

Attendees

Participant	Company/Agency
Roscoe Mata	City of Millbrae
Hitta Mosesman	Harris & Associates
Irlanda Martinez	Harris & Associates
Kelly Morgan	Harris & Associates
Service Provider # 1	

Greatest Housing Need

- Extremely low-income housing and housing for individual with developmental disabilities – with the two groups often overlapping.
- It can be tough to find affordable housing that provides services for individuals with developmental disabilities.
- There has been a decline in the number of group homes available for the developmentally disabled that also offer services. The group homes tend to be single family homes with commercial licenses, allowing them to provide services. The high cost of housing now makes it harder to create new homes and also makes it easier for those who own these homes to sell them as residential once the covenant is up rather than keep it as a business.
- Currently Millbrae reports a small population of developmentally disabled (estimated 44 individuals with 38 still living at home). The concern is that as these individuals age in place, once they hit the age range of 42-61, they become at increased risk of displacement as they home they are residing in is no longer able to provide placement for them (ex. aging parents).
- And it is a concern that the current count is so low because a portion of these individuals are currently displaced – this is evidenced by the fact that while the 42-61 age group count is low, there is a rise in the 62 and over age group.
- There are limitations to the services local entities can provide – sometimes can only provide referrals to group homes like Samaritan House but not provide any funding for group or residential housing. Regional centers are able to fund group homes but not residential homes.

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Programs, Procedures, or Incentives to Encourage Housing Development

- **Vouchers** – Back in 2020 the Housing Authority offered vouchers through the Mainstream Voucher program. Anyone who was at immediate risk of homelessness could apply for and receive an emergency voucher within 90 days.
    - Voucher accessibility can also be an issue. When rents were low after the pandemic, vouchers were helpful but now that rents are starting to return to pre-pandemic levels, they may not be as helpful depending on their defined guidelines – HUD vs. county specific. Different cities and counties have different setups – HUD is defined by rent limit whereas some counties are based on household income. For instance, San Mateo is set up to acknowledge a blanket 50% of income goes towards rent when utilizing vouchers and while that might be achievable for some, for those who are at lower percentages of the AMI, this results in a cost burden, leaving very little income left for cost of living.
    - Cities and counties should advocate for having a fixed voucher definition be based on extremely low-income levels (30% of the AMI).
- **Inclusionary housing and/or Density Bonus Law** - Could have a requirement that requires extremely low to very low-income housing. And then cities/counties should be advocating for this by creating accompanying incentives/concessions for development of housing at these levels.
- **Inclusionary Housing Fees** – Prioritizing the use of revenue generated by inclusionary housing fees (and really any other revenue from affordable housing programs) for the development of extremely low-income units.
- **Programs** - There are also programs that can be crafted by cities and counties that will also incentivize the development of affordable housing at the extremely low-income level.
    - The City of Santa Cruz offers and ADU financing program that is a deed restricted forgivable loan after 15 years providing the units are rented to extremely low-income families.
    - Foster City, Santa Clara and Santa Cruz do a program where they have a master lease with homeowners where homeowners are then able to rent out rooms to developmentally disabled individuals at affordable housing cost and service providers are then able to provide supportive services.
    - Menlo Park provides a generous housing overlay
    - Sunnyvale waves park & in-lieu fees for affordable housing developers
    - Half Moon Bay, Santa Clara County and San Mateo County also offer incentives and concessions to density bonus and inclusionary housing as well – some of what they have implemented can be found in MidPen Housing's Housing Element Best Practices guide found here.
- **Utilization of SB1851** - Currently being utilized in San Jose – Cathedral of Faith has provided land resulting in the current development of 200 affordable housing units with 40 allocated for developmentally disabled individuals.

Design/Development Efforts

- **Development near transit** – Access to transit is a huge factor. Individuals with developmental disabilities along with those at extremely low incomes are often transit dependent so access allows more independence and connectivity to the community, employment opportunities, services, etc. So, it is key that affordable housing is near transit centers. Millbrae is unique in that they have the downtown sites bear transit so this would be a very beneficial area for affordable housing.
    - An offshoot of this is that cities/counties can advocate for lower parking requirements for affordable housing developments that are near transit areas as the typical amount of parking is not needed and this helps the financial feasibility of the project.
- **Unit Size** – Advocate for a mix of unit sizes as studios are not always sufficient. While the majority of the need is for 1-bedroom units, sometimes there is need for 2-bedroom to accommodate a live in-aid or families.

- **Accessibility Modifications** – while most developmentally disabled individuals looking for affordable housing require accessibility to services more than anything, the need for affordable housing that provides accessibility modifications to address physical disabilities remains important. The Kelsey in San Francisco is a good example of inclusive housing design standards.
- **Targeting City and County owned land** – Cities should be looking into if any county owned land that exits within city limits is an opportunity for affordable housing and same with city owned land. Not sure how interested cities are but has seen San Mateo County provide use of land for these efforts.
    - San Mateo is currently using the help of MidPen Housing to redevelop city-owned parking lots into affordable housing.
    - East Palo Alto is developing a navigation center and affordable housing on county owned land that lies within city limits.

Any additional efforts that can be made to encourage Affordable Housing

- **Affirmative Marketing –** Developers and jurisdictions should be reaching out more when there is knowledge of affordable and accessible housing being developed – predevelopment to completion.

Additional Considerations

- For engagement with affordable housing developers, suggestion to reach out to MidPen Housing, Housing Leadership Council, The Core Companies, and Edenbridge.

AFFORDABLE HOUSING DEVELOPER STAKEHOLDER MEETING # 1 (JULY 11, 2022)

- Invitation
- Meeting Agenda
- Meeting Minutes
- Additional Participant Outreach

Affordable Housing Developer Stakeholder Meeting # 1 (July 11, 2022)

Invitations

Stakeholder Meetings

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San Mateo County Health	No
Self-Help for the Elderly San Mateo County	No
Youth Leadership Institute	No
Youth United for Community Action	No

From: Kelly Morgan
Sent: Wednesday, June 22, 2022 1:35 PM
To: [redacted]
Cc: Hitta Mosesman <Hitta.Mosesman@weareharris.com>; Irlanda Martinez <Irlanda.Martinez@weareharris.com>
Subject: City of Millbrae Housing Element - Affordable Housing Developer and Community Organization Input

Good afternoon,

I am contacting you on behalf of the City of Millbrae. The City is currently working on their Housing Element Update and believe that input from affordable housing developers and community organizations in the region is critical to developing goals, policies, and programs to provide expanded affordable housing. We would really appreciate an hour of your time to get some input on things the City can do to encourage and facilitate affordable housing.

Due to the pandemic, we are proposing a virtual meeting. Please let us know (no later than Monday, 6/27) if you would be available to participate next week by using our doodle poll at the below link:

https://doodle.com/meeting/participate/id/dGZWMMKb

This meeting would give you the opportunity to share your ideas on the barriers and possible incentives for building affordable housing.

We appreciate your time on this and hope we can help foster collaboration between the City of Millbrae, affordable housing developers, and local community organizations to help address the City's affordable housing needs.

Thank you,

Kelly Morgan (she/her/hers)
Deputy Project Manager
Community Development + Housing Consulting
Harris & Associates
22 Executive Park, Suite 200
Irvine, CA 92614
C: 562.230.0576 | W: 949.655.3900
www.WeAreHarris.com

From: Kelly Morgan
To: [redacted]
Cc: Hitta Mosesman; Irlanda Martinez; Nestor Guevara; Roscoe Mata; Darcy Smith
Subject: City of Millbrae Housing Element - Affordable Housing Developer input
Date: Friday, July 1, 2022 1:48:00 PM
Attachments: image001.png

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From: Kelly Morgan
To: [redacted]
Subject: City of Millbrae Housing Element - Affordable Housing Developer Input
Date: Wednesday, July 6, 2022 1:25:00 PM
Attachments: image001.png

Good afternoon,

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Due to the pandemic, we are proposing a virtual meeting. Please let us know if you would be available to participate on one of the dates/times listed below:

- Thursday, July 7 – 4:00 pm – 5:00 pm
- Monday, July 11 – 4:00 pm – 5:00 pm
- Wednesday, July 13 – 10:30 am to 11:30 am or 2:00 pm to 3:00 pm
- Thursday, July 14 – 4:00 pm – 5:00 pm

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From: Kelly Morgan
To: [redacted]
Subject: FW: City of Millbrae Housing Element - Affordable Housing Developer Input
Date: Wednesday, July 6, 2022 1:27:00 PM
Attachments: image001.png

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From: Kelly Morgan
To: [redacted]
Subject: City of Millbrae Housing Element - Affordable Housing Developer input
Date: Friday, July 8, 2022 1:46:00 PM
Attachments: image001.png

Good afternoon,

I am contacting you on behalf of the City of Millbrae. The City is currently working on their Housing Element Update and believe that input from affordable housing developers in the region is critical to developing goals, policies, and programs to provide expanded affordable housing. We would really appreciate an hour of your time to get some input on things the City can do to encourage and facilitate affordable housing.

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Harris & Associates
22 Executive Park, Suite 200
Irvine, CA 92614
C: 562.230.0576 | W: 949.655.3900
www.WeAreHarris.com

From: Kelly Morgan
To: [redacted]
Subject: City of Millbrae Housing Element - Affordable Housing Developer input
Date: Friday, July 8, 2022 1:46:00 PM
Attachments: image001.png

Good afternoon,

I am contacting you on behalf of the City of Millbrae. The City is currently working on their Housing Element Update and believe that input from affordable housing developers in the region is critical to developing goals, policies, and programs to provide expanded affordable housing. We would really appreciate an hour of your time to get some input on things the City can do to encourage and facilitate affordable housing.

Due to the pandemic, we are proposing a virtual meeting. Please let us know if you would be available to participate on one of the dates/times listed below:

- Monday, July 11 – 4:00 pm – 5:00 pm
- Wednesday, July 13 – 10:30 am to 11:30 am or 2:00 pm to 3:00 pm
- Thursday, July 14 – 4:00 pm – 5:00 pm

This meeting would give you the opportunity to share your ideas on the barriers and possible incentives for building affordable housing. We appreciate your time on this and hope we can help foster collaboration between the City of Millbrae and affordable housing developers to help address the City's affordable housing needs.

Thank you,

Kelly Morgan (she/her/hers)
Deputy Project Manager
Community Development + Housing Consulting
Harris & Associates
22 Executive Park, Suite 200
Irvine, CA 92614
C: 562.230.0576 | W: 949.655.3900
www.WeAreHarris.com

Affordable Housing Developer Stakeholder Meeting # 1 (July 11, 2022)

Meeting Agenda

City of Millbrae
Housing Element Update

AGENDA

Name of Meeting:	Affordable Housing Developers Stakeholder Meeting
Date of Meeting:	July 11, 2022
Time:	04:00 PM – 05:00 PM PST
Location:	Zoom Meeting
Subject:	Housing Element Update - Challenges & Opportunities
Distribution:	Email
Date issued:	July 11, 2022

Purpose of Meeting: Obtain Input from Affordable Housing Developers and Community Organizations on the City's Regional Housing Needs Allocation (RHNA)

6th Cycle Housing Element Update – Overview (Harris & Associates)

Solutions to Meet RHNA (All)

a. What are some challenges and opportunities you face as a developer while trying to develop affordable housing in a community like Millbrae?

b. Where / under what conditions do you see opportunities for commercial (including parking lots) to residential conversions? What programs or policies do you believe would encourage such conversions?

c. Have you encountered any programs, procedures, or incentives in other cities that have significantly facilitated housing development?

d. Are there any constraints with obtaining loans (construction and/or permanent) for a project in Millbrae?

e. As funding for affordable housing is severely limited, what types of things can the City do to incentivize affordable housing projects (e.g., zoning, fee deferrals, streamlining, etc.)?

f. Have you considered a project in Millbrae or San Mateo County within the last 3 years? Why or why not?

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g. In your opinion, what are some creative housing solutions that would help a city like Millbrae develop more housing/ affordable housing?

h. Are you interested in potentially partnering with a church or religious institution for a project (per recently passed SB 1851)? What could the City do to assist?

Attachment:

1. City of Millbrae 6th Cycle Draft RHNA Numbers (from ABAG)

Attachment 1

Draft 6th Cycle RHNA Numbers from ABAG

Income Category (% of County Area Median Income (AMI))	Units
Extremely Low / Very Low (0% - 50% AMI)	575
Low (51% - 80% AMI)	331
Moderate (81% - 120% AMI)	361
Above Moderate (120% AMI or above, which is considered market rate)	932
TOTAL	**2,199**

Affordable Housing Developer Stakeholder Meeting #1 (July 11, 2022)

Meeting Minutes

City of Millbrae
Housing Element Update

MEETING MINUTES

Name of Meeting: Affordable Housing Developer Input
Date of Meeting: July 11, 2022
Time: 04:00 pm
Location: Zoom
Subject: Affordable Housing Development in the City of Millbrae

Attendees

Participant	Company/Agency
Hitta Mosesman	Harris & Associates
Irlanda Martinez	Harris & Associates
Kelly Morgan	Harris & Associates
Affordable Housing Developer	

Challenges and Opportunities as an Affordable Housing Developer

- When working on a previous project that was small but overall part of a larger project of a larger project (Bart station Gateway at Millbrae BART project) - from start to finish on the entitlement side, the project took 8 yrs. to get approved.
- The review time periods it takes jurisdictions to review the projects and approve can be a challenge. Typically, it takes anywhere from 24-36 months for standalone projects - usually due to indecisiveness amongst City ranks or community opposition. Timing on the regulatory side when looking at getting discretionary approval is an issue.
- Another challenge is the inflationary period the housing market finds itself in with high construction costs, scopes of work for soft cost budget, insurance, etc. With prices on just about everything going up, it does seem to stop jurisdictions from increasing their fee schedule (impact, fee ex.). At least on the market rate side, there is a mix of escalating costs and decreasing rents, making it harder to underwrite. On the affordable side, in San Jose for ex., you're seeing costs on the affordable side increasing so much that's it's to the point that you can't finance even with public funding assigned to the deal. Would be nice to have some regulatory certainty in how a city adapts to an inflationary environment.
- Opportunities might include the City promoting publicly owned sites where they want to see affordable housing development. In prior experience, has seen City's get creative and work through some fee waivers to help finance projects – that goes a long way to help make financing feasible.

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Opportunities for commercial to residential conversion

- When it comes to opportunities to convert commercial space into affordable housing, some of the commercial uses in terms of opportunities are more so an underutilized office building that is not viable or updated or its part of the specific plan area or TOD project, not necessarily strip malls.
- If you had a commercial site going to residential use, you could create a housing friendly policy in the general plan to help promote this.
- A lot of times cities will have projects where a jurisdiction insists on a certain amount of commercial to be on the bottom floor and when that happens, the developers don't really plan sufficiently for a combination of these projects. It's rare to find a site where there is enough traffic volume to make housing/commercial functional. Remembers a development where there was 25,000 sq ft. of commercial land but the City couldn't agree on how much should be used for affordable housing, and when they negotiated and settled down to a smaller amount of affordable housing, it was a really difficult compromise. Mixed use communities can't always be expected for every commercial site.
- One example is the Santa Clara Agro farm project – this had housing set aside for permanent supportive housing and in response to community concerns, the City provided an urban farm that is maintained at a cost of $100K + dollars per year.
- Another project had special requirements for a childcare center with no funding identified, water feature on the podium deck…just providing housing is no longer enough to a jurisdiction. Part of the discussion needs to be that if you are truly serious about adding additional housing then that needs to be the primary focus and all the other secondary wants need to take a seat. It is understood that there are political pressures for cities when they have community or committee members that want certain uses but it can wind up becoming a constraint. That said, not really sure how to overcome that.
- Most opportunities seen are for land that is an acre in size and that can require using bonus densities to lower parking requirements.
- If looking at providing additional density to help with commercial requirements for a mixed-use environment, it can be dependent upon a lot of factors. It depends on how much parking would be required. If you had a larger project with larger units, chances are you going to require parking for more than 1 space for unit and if that were the case then you might have to go underground and have to excavate, etc. and there is going to have increased cost. The larger the building, the more there might be a requirement for increased costs and then you have to consider what does that transition look like to adjacent buildings. You also have to consider property owner issues (will they sue if they don't like what you proposed for the site or if they don't like the entitlements).

Programs, procedures or incentives from other cities that facilitate affordable housing development

- Reduced setbacks might be something to consider - ex. if you would normally require a 20 ft setback depending on adjacent use, lower it to 10 and then it allows you to make more efficient use of the project site.
- Increasing density, decreasing parking requirements, offering pre-development funding. Usually $2-3M is typical in costs to get a development to building status so even if assistance could be provided on the initial pre-development part of the cycle, that would help quite a bit.
- Clarifying review time periods for formal projects so discretionary approvals don't take multiple years. If there is an affordable project - structure a policy that will offer quicker time frames. Should be noted that this could be a challenge especially if leveraging county funds because they have affordability requirement (political optics) but those are just some of the ideas.
- Fee deferrals (ex. deferring to certificate of occupancy) can possibly be helpful but not sure by how much. In prior experiences, the last (2) deals that closed didn't have that as an option. Typically, by the time you close a deal, you have raised all your financing and fees (whether its available upon close or 12 months

after). The idea is that if you have done good projections then the fee timing wouldn't typically be an issue.

- Additional streamlining to push project forward any special consideration for affordable projects. Ex. Santa Clara – the company was selected through a competitive RFP process and at the time had to demonstrate plan to get to construction completed in 2017. The project then took 4 1/2 years to get entitled (due to location and stakeholders). In that 4-year time frame construction costs increased and as a result, a lot of elements they initially wanted to include they no longer could because cost went up so much. Permitting certainty and streamlining to move things quicker at the local level would have been helpful in this instance or those like it.

Consideration of additional projects in Millbrae/San Mateo County

- Not necessarily in Millbrae but yes in San Mateo County - Daly City has a couple of opportunity sites and there are a few projects in Menlo Park (VA campus). San Mateo County is good to work with and supportive on affordable housing. They were one of the lenders (funding though AHF program) for a prior Millbrae project. If the right opportunity presented itself in Millbrae, would definitely look into of further.
- When looking for sites to consider, number of different brokers are utilized to look for opportunities and then there is also the utilization of a resources map (through TCAC), something UC Berkley put together so when looking to confirm any possible projects are in high resource areas, we will use that. High resource includes proximity to jobs and other considerations as well. High resource areas are more desirable as if it's a low resource area, it's not as competitive for state funding.
- We also consider if the land is publicly owned land and if not and it is privately held, what's the owner looking for and is that something you think you can fundraise for. Sometimes market rate developers are easier for landowners to deal with because they have easier financing availability.
- Projects done in Millbrae, Santa Clara, and San Jose were all done on publicly owned land and since with the company, he has not done AH on privately owned property.
- And if land is privately owned versus publicly, it doesn't necessarily stop development consideration because you never know who is going to step up to help with financing. If located in the right area you can leverage money from various sources based on population served or something like that. It does seem like opportunities seem to be more so on publicly owned land - but this takes longer to get entitled and approved - so even publicly owned land has those challenges and unique sets of expectations.

Creative solutions Millbrae can look to?

- Viable solutions are dependent on the sites that exist. It sounds like there is not a lot of public opportunities that exist. That said there could be some opportunity in mixed housing developments. One example is that for Santa Clara's 6-acre site, there was a variety of housing uses - town homes, market rate, and affordable housing. And then compensation to the City for their land was provided from the residuals on the sale of the town home component. If you have a larger site that can support the other sources, you have something to help incentivize the developer to make AH housing. Multi-types of housing in order to get affordable housing done is one of the most creative ways seen in the last 10 years.
- NOFA amounts that are larger are generally more desired. Ex, earlier on the year for a job for a San Jose development that had a $100M NOFA, the award was for $16.7M (structured as a permanent loan source with flexibility as to when the funding come in). But that's just that project – it's definitely not an apples-to-apples comparison.
- And if a portion of the NOFA came in from grant funding and in addition to that had a certain set aside to fund pre-development that might make for an attractive option for affordable housing developers. Ideally you want to try and raise from local sources as much as possible but really anything to help cover the pre-development expenses is extremely beneficial.

Interest/project familiarity with SB 1851 (partnering with local church for affordable housing development)

- Haven't come across a development sit or opportunity where that was a viable option but would be open to exploring that should the opportunity present itself.

Affordable Housing Developer Stakeholder Meeting #1 (July 11, 2022)

Additional Participant Outreach

From: [redacted]
To: Kelly Morgan
Subject: [External]Millbrae Housing Element update
Date: Sunday, July 17, 2022 5:26:39 PM
Attachments: image001.png

Hi Kelly,

Below, please review the responses to your questions and let me know if you have any comments/questions. [redacted] Thank you!

> -------- Forwarded message ---------
> From: **Kelly Morgan** <Kelly.Morgan@weareharris.com>
> Date: Tue, Jul 12, 2022 at 11:15 AM
> Subject: Millbrae Housing Element Update - Affordable Housing Developer Input
> To: [redacted]
>
> Good afternoon [redacted],
>
> Thank you for responding to our doodle poll regarding the City of Millbrae Housing Element Update – Affordable Housing Developer Input. I know you had indicated availability for the July 13th, 2:00 pm option but due to scheduling issues, we are no longer able to offer that as a meeting option. We know that the schedules of those we have solicited input from tend to be busy so we thought it might be easier to give an option to provide input via email if so desired.
>
> We were hoping that you would still be willing to provide your insight and thoughts on how the City can encourage affordable housing development along with some of the challenges/opportunities you have come across as an affordable housing developer (whether that be related to projects within the City or San Mateo County). If interested, we would love to hear your thoughts on the following discussion prompts (please provide your response no later than Friday, July 15 at 3:00 pm).
>
> 1. What are some challenges and opportunities you face as a developer while trying to develop affordable housing in a community like Millbrae? Access to additional City funding support and flexible regulations that allow for the transfer of impact fees are important.
> 2. Where / under what conditions do you see opportunities for commercial (including parking lots) to residential conversions? What programs or policies do you believe would encourage such conversions? Affordable access to the land is key and help with figuring out how to reduce the cost of bringing utilities to the site would

be incentivizing.

3. Have you encountered any programs, procedures, or incentives in other cities that have significantly facilitated housing development? Redwood City has used impact fee diversion through alternative affordable housing plans very effectively. They also actively encourage and facilitate partnerships between developers and nonprofit housing organizations.

4. Are there any constraints with obtaining loans (construction and/or permanent) for a project in Millbrae? Leveraged financing from the City.

5. As funding for affordable housing is severely limited, what types of things can the City do to incentivize affordable housing projects (e.g., zoning, fee deferrals, streamlining, etc.)? Zoning variances, fee deferrals, reduced parking requirements and streamlining are all great. Access to land and partnership facilitation between for-profit and nonprofit entities is also key. Additionally, be cautions of "death by 1000 fees" like mandatory annual per door compliance fees and requirements like mandatory supportive services in operating budgets of completed projects.

6. Have you considered a project in Millbrae or San Mateo County within the last 3 years? Why or why not? No. As a small developer, the County has too many fees and other things that make projects cost prohibitive for us. We have never done a project in Millbrae but would be curious about how to make something happen in the City.

7. In your opinion, what are some creative housing solutions that would help a city like Millbrae develop more housing/ affordable housing? Home Sharing utilizes existing housing stock to create new affordable housing opportunities for residents and persons who work in Millbrae. Home owners and renters with extra space reduce housing costs by sharing underutilized space while Home Seekers pay lower rent than market-rate housing and can also reduced housing costs by exchanging extra household chores for reduced rent. Accessory Dwelling Units (ADUs) are also a creative opportunity to increase affordable housing within the city however to keep rents affordable, the city may want to consider an incentive for a ADU Homeowner so that they are more inclined to rent the ADU at an affordable rate.

8. Are you interested in potentially partnering with a church or religious institution for a project (per recently passed SB 1851)? What could the City do to assist? Definitely on the affordable property management side of things but we don't typically build new unless partnered with another developer.

Thank you!

Kelly Morgan (she/her/hers)
Deputy Project Manager

Community Development + Housing Consulting

Harris & Associates

22 Executive Park, Suite 200

Irvine, CA 92614
C: 562.230.0576 | W: 949.655.3900
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--
Warm regards, [redacted]

[redacted]

OTHER OUTREACH

Help Shape the Future of Housing in Millbrae!

The City is updating the Housing Element of the General Plan in compliance with State law.

The Housing Element:

- Identifies the housing needs, resources, and constraints
- Provides list of properties for planned housing development
- Analyzes fair housing issues
- Provides housing plan - goals, objectives, policies, and programs

Please help shape the future of housing in the City by participating and providing you input.

Ways to participate include:

Visiting our dedicated web page with Housing Element information ci.millbrae.ca.us/HEU

Joining our Community Workshop on June 30, 2022 @ 6 pm https://us02web.zoom.us/j/84042163013

Providing your feedback by filling out our Housing survey located on the housing element web page https://www.surveymonkey.com/r/FDMWVZW

If you have any questions please contact nguevara@ci.millbrae.ca.us or call 650-259-2335

We want to hear from you about housing in Millbrae!

MILLBRAE

City News

CREATING A MORE AFFORDABLE FUTURE WEBINAR SERIES

Post Date: 10/12/2021 7:59 AM

Join us for a four-part webinar and community discussion series to better understand housing issues in San Mateo County.

The first webinar in the series – Why Affordability Matters – will take place on Wednesday, October 13th, 2021, at 6 p.m. via Zoom.

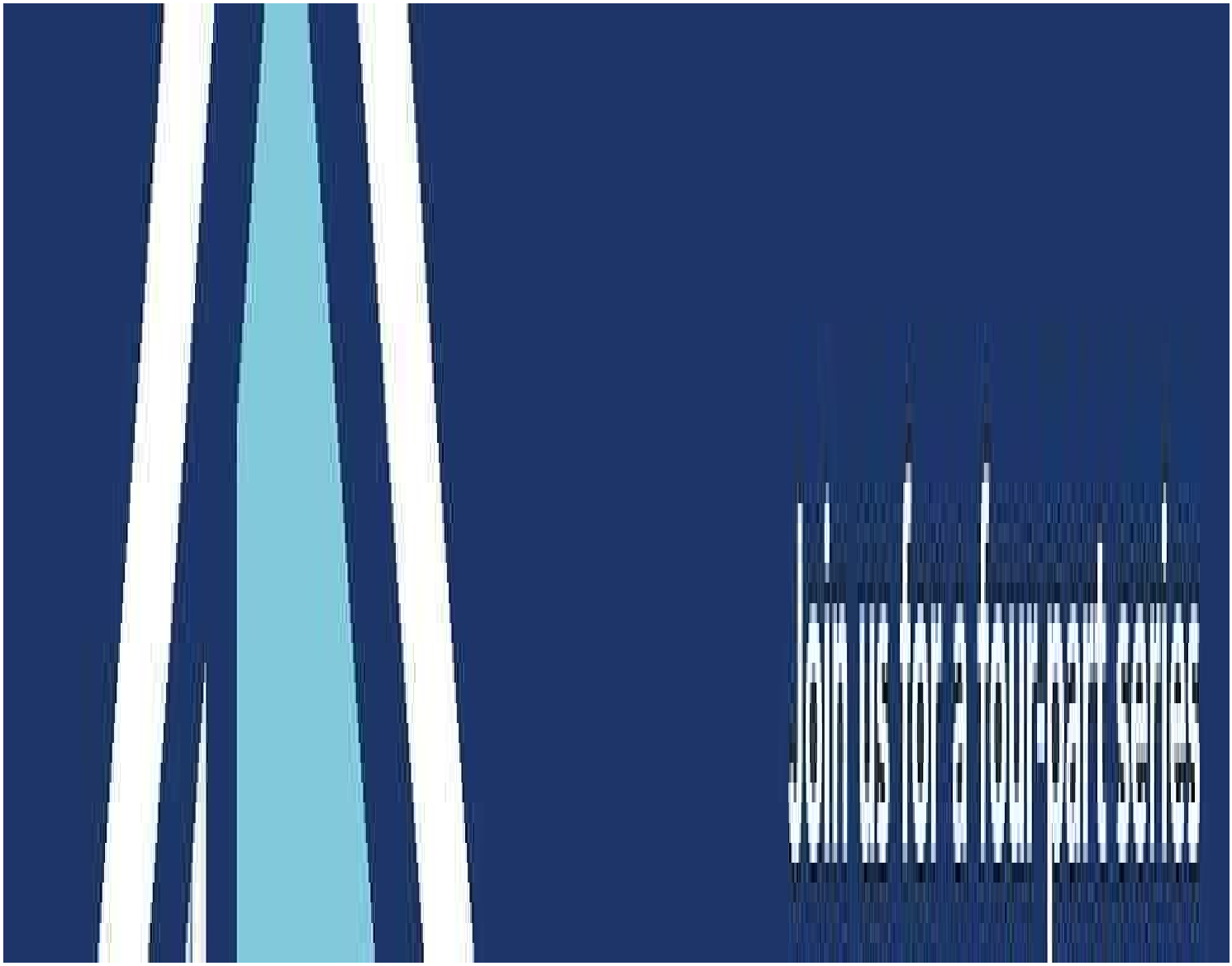
To register and attend this webinar, please visit https://www.letstalkhousing.org/lthevents/why-affordability-matters.

During the webinar, topics discussed will include: Why are our housing prices so high, and how did we get here? What does "housing affordability" mean? How is it measured? Who needs affordable housing?

Each San Mateo County community is currently updating its Housing Element – a housing plan that is part of every jurisdiction's General Plan – and we can use your informed input.

This series on Creating a More Affordable Future will help you learn more about the problem and possible solutions for our communities.

To learn more about this and the other webinars in the series, please visit www.letstalkhousing.org/events.



Return to full list >>

OTHER PUBLIC COMMENT

- Public Comment Response Summary
- Emails Received by City Through March 2023

Other Public Comments

Public Comment Response Summary

Table 1. Public Comments

Commenter	Comments	Responses
Housing Leadership Council of San Mateo county	**9/19/2022 Email/10/10/2022 Letter**: **1.** Site inventory has a lot of good sites. Densities on selected sites could be higher. **2.** While Millbrae provides a good analysis for each site, it could strengthen its analysis for Sites 7, 9, 10, 11, and 17. **3.** Limited public engagement and poor AFFH outreach. Does not seem to have consulted with many stakeholders in a meaningful way. The city should plan focus groups.	**Actions to Address/Staff Responses**: **1.** It is unclear whether the question refers to the existing zoning and associated densities for each site or the realistic capacity for the projected units for each site. Realistic capacities are based on the most recently-approved projects in Millbrae (Per pages 19 – 23 of the California Department of Housing and Community Development (HCD)'s Site Inventory Guidebook – *https://www.hcd.ca.gov/community-development/housing-element/docs/sites_inventory_memo_final06102020.pdf*. Additionally, the densities are based on the current zoning and includes updated zoning and higher densities under the Downtown/El Camino Real Specific Plan. **2.** The analysis for each site considered all the requirements established by HCD via its Sites Inventory Guidelines document. In addition to the State's requirements, the Housing Element utilized additional factors like improvement value to land ratio, owner interest, and vacancies. The City is happy to provide additional information, as required by the State. **3.** The City undertook various community engagement activities, both on its own and in partnership with 21 Elements, involving over 30 meetings, webinars, surveys, and focused stakeholder meetings. These specific activities included: **a.** Affirmatively Furthering Fair Housing countywide survey **b.** Citywide community workshop **c.** Countywide stakeholder listening session series in partnership with 21 Elements **i.** Four sessions convened more than 30 groups including fair housing organizations, housing advocates, builders/developers (affordable and market-rate), and service providers (a specific list of attendees can be found in the "Public Meetings and Hearings" section of Appendix A). **d.** Citywide-focused stakeholder meetings **i.** The City invited more than 50 groups (local developers, service providers, and housing advocacy groups) to participate in the City's focused stakeholder meetings. Of the 50, nine attended the meetings (a specific list of groups invited can be found in the "Public Meetings and hearings" section of Appendix A).

Commenter	Comments	Responses
		e. City's webpage and social media **f.** "Let's Talk Housing" website with 21 Elements **g.** Informational videos on the Housing Element Update with 21 Elements **h.** Countywide introductory meeting to the Housing Element Update **i.** Countywide "All About RHNA Webinar" in partnership with 21 Elements **j.** Countywide "Creating Affordable Future Webinar Series" in partnership with 21 Elements **k.** Citywide community survey **l.** Countywide" Equity Advisory Group" in partnership with 21 Elements (a specific list of participating organizations can be found in the "Public Meetings and Hearings" section of Appendix A). For specific information on each activity, please see "Appendix A – Community Engagement" and "Appendix B – Affirmatively Furthering Fair Housing" of this Housing Element.
	4. The subjectivity of Millbrae's process has impacts on development costs: According to the Housing Element, design review typically takes 12-14 months for multi-family proposals, an unjustifiable delay to impose. The City justifies constraints, rather than addressing them.	**4.** The City identified the design review period as a growth opportunity and added programs to help streamline the process. Specifically, Program HIP-22 would increase communication between staff and developers and provide pre-application meetings upon request to provide resources for developers. Furthermore, Program HIP-23 prioritizes and expedites the review of affordable housing and special needs projects. These are only two examples of the steps the City is taking to address this issue.
	5. Millbrae's fees also pose a constraint to housing. Millbrae charges some of the highest fees in San Mateo County.	**5.** The City of Millbrae did not have development fees for many years and housing growth was relatively slow (market rate and affordable). However, housing development activity has increased substantially in the last 3-4 years and improvements to existing infrastructure, facilities, and services were needed to accommodate the housing growth. In response, the City adopted the existing fees under Assembly Bill 1600, as allowed by California Law. Development impact fees, specifically, depending on the cost of land, construction, materials, and labor when they are established. It is very important to note, as stated in the Constraints chapter, that development fees vary widely depending on what year the fees were established. Development fees are to only cover costs of developing infrastructure and facilities and provide services then. Therefore, cities that were established in 2014 would be

Commenter	Comments	Responses
		based on construction, land, and other development and service costs in 2014, whereas fees adopted in 2021 would reflect the significant increases in these costs. This is what accounts for the difference between Millbrae's fees as compared to surrounding cities. *Importantly, there are over 1,700 housing units in the planning stages, that are approved or are under construction, which provides substantial evidence that Millbrae's fees do not represent a constraint that impedes or prevents housing development*. Jurisdictions are allowed to collect fees for actual costs of improvements to facilitate development. Furthermore, the City added program HIP-14, which calls for a residential development feasibility study to ensure that residential development continues to be financially feasible with the current fees.
	6. Constraints analysis does not adequately consider how California High-Speed Rail (CalHSR) may affect development patterns.	**6.** High-Speed Rail through Millbrae has been planned for almost 15 years and has not presented an identifiable constraint to date. The City has undertaken two specific plans to encourage development in the downtown area near transit and jobs. Importantly, the Gateway at Millbrae Station development, which includes 400 units, is an approved project and as provided in HCD's Site Inventory Guidebook, is included in the Sites Inventory.
	7. Sites inventory does not describe CalHSR for many relevant sites. More analysis is required to justify the Monte Sereno site.	**7.** More analysis was not provided for the Serra Station and Gateway at Millbrae Station development because they were already approved. In addition, there are no identifiable constraints related to CalHSR.
	8. Site inventory uses arbitrary affordability projections for nonvacant sites. The city should provide stronger justification for affordability assumptions.	**8.** The Sites Inventory Analysis evaluated the existing use, allowable densities under current and proposed zoning designations, and HCD's Site Inventory Guidebook. Furthermore, affordability assumptions are based on HCD's Sites Inventory Guidelines (See pages 11 - 18), as well as research conducted to identify privately-owned parcels that had a retail, office or other commercial use (including parking lots) that redeveloped into 100% affordable housing projects in the local region over the last 8 years (See table 7-13 on page 7-43 of the Housing Element).
	9. Millbrae claims "The maximum FAR in the MSASP ranges from 2.0 to 2.5. In the TOD zone, the maximum FAR may be lifted in exchange for community benefits. This is not a constraint on development." This is	**9.** The maximum FAR in the MSASP is not a constraint on development. Specifically, Millbrae's Inclusionary Housing Ordinance requires 15% of the units to be Below Market-Rate (BMR) units. This automatically qualifies developers for density bonus incentives/concessions and allows them to exceed the maximum FAR.

Commenter	Comments	Responses
	not a legitimate analysis, it is an arbitrary dictate. The TOD zone allows developments of 80 du/ac and at least 65 feet height; it is hard to imagine that a FAR of 2.5 is not a constraint on development under these conditions. The city should present evidence indicating that development proposals in its TOD zone never request FAR reductions, which would indicate that its FARs are not a constraint, or the city should implement a program to increase FARs. The draft housing element makes similarly unsupported claims regarding low FARs in the Downtown and El Camino Real Specific Plan. **10.** Several programs do not seem fully fleshed out, will not have much impact, or lack metrics or substantial actions. **a. HIP-13, Replacement Housing for Existing Lower Income Units on Sites for Residential Development:** Describes well-intentioned strategies that could pose a constraint to the city's pipeline projects. The housing element claims "City will require an agreement provided by the City … to ensure the replacement of lower-income units" at the	***10.*** These programs were developed given the City's existing resources of staff and funding. Jurisdictions are not limited to the programs included in the Housing Element and can choose to go beyond the programs included in the Housing Element. The programs as drafted, represent attainable actions based on current staffing and funding resources.

Commenter	Comments	Responses
	1100 El Camino Real and 230 Broadway projects for them to receive building permits.19 Rather than pushing unfunded costs onto the developer, HLC recommends Millbrae offer incentives in exchange for the preservation of affordable homes. Strictly requiring a replacement affordable unit for the 230 Broadway project would render many six-unit projects infeasible, particularly considering Millbrae's onerous in-lieu fees for small projects. b. **HIP-14, Conduct a Residential Development Feasibility Study:** Should commit to waive or defer fees for affordable units to low- and very low-income households and units geared toward special needs populations, including the disabled and large families. A nexus study is not required. c. **HIP-18, Encourage and Incentivize ADUs**: Does not have enough policies and programs. Could do preapproved ADU plans, fee waivers for deed-restricted units, 2nd units on large lots. d. **HIP-23, Prioritize Review and Expedite Development of Affordable and Special Needs**	

Commenter	Comments	Responses
	Projects: Promises to formally expedite review for "Affordable and Special Needs Projects." This program should have needs metrics for success, including data on current processing times for such housing, goals for reducing processing times, and a plan to ensure that processing times do not decrease for other types of applications. HLC proposes an additional program to expedite processing times later in this section e. **HIP-27, Update Density Bonus Ordinance:** Has potential to build on good statewide policy. Great potential program but it should have metrics! f. **HIP-28, Anti-Displacement Measures:** This does not have much traction. g. **HIP-32, Local Funding for Affordable Housing:** References commercial linkage and housing in-lieu fees, but the housing element does not mention money raised or funding projections. The program should specify funding expectations and commit to regular RFP.	

Commenter	Comments	Responses
	h. **HIP-36, "Funding, Incentives, and Concessions for Extremely Low-Income Developments**," needs more supporting actions. The program describes potential funding and technical assistance but does not provide many incentives or concessions. Funding goals are unclear.	
Yimby Law	**10/10/2022 Email:** 1. The Housing Element fails to "remove governmental… constraints to the…development of housing." (Gov. Code Section 65583(c)(3)). The draft lists only five programs for constraint removal, none of which seem to propose anything beyond what State law already requires. 2. Contradictory to the City's claim as the Bay Area's transportation hub, Millbrae does a poor job of accommodating the housing that a typical SFO or BART worker might afford. 3. Acknowledging that it charges higher fees than nearby cities, Millbrae offers the bizarre excuse that its fees are higher because it	**Actions to Address/Staff Responses:** 1. The City analyzed governmental and non-governmental constraints under the requirements defined by the State by way of the Housing Element Law. For every constraint found, the City included a program that would help mitigate or correct the condition. 2. First, the City has recently enacted inclusionary zoning and commercial linkage fees for providing requirements for affordable housing to boost the production of affordable housing, something that not every jurisdiction in the region does. The results are shown in the affordable units that are part of pipeline projects. Additionally, the City is proposing 14 different programs that encourage and facilitate the development of affordable housing. 3. See response 5. an on pages 1-2.

Commenter	Comments	Responses
	recently set its fees higher.	
	4. Design review remains required for every application and ties up development for either 6-8 or 12-14 months.	**4.** The City identified the design review period as a growth opportunity and added programs to help streamline the process. Specifically, Program HIP-22 would increase communication between staff and developers and provide pre-application meetings upon request to provide resources for developers. Furthermore, Program HIP-23 prioritizes and expedites the review of affordable housing and special needs projects. These are only two examples of the steps the City is taking to address this issue. Additionally, design review is still allowed by State law even on by right projects. Simply having a design review process that exists, which nearly every jurisdiction in the State has, does not automatically designate a constraint.
	5. Millbrae's plan is simply to slap some extra density around El Camino Real and the 101. Most of the City will remain zoned to enforce wasteful lot coverage and minimum-size requirements that ordinary people can no longer afford.	**5.** California's Housing Future: Challenges and Opportunities Final Statewide Housing Assessment 2025 (2025 Assessment), prepared by HCD emphasizes throughout the document that the location of housing (including affordable housing) near transit and job centers is an important policy and implementation strategy. Additionally, during outreach with local advocates, the issue of access to transportation for persons with disabilities was heavily discussed as a major concern for advocates. Millbrae found that the Downtown and El Camino Real area facilitates access to jobs and services for all residents. Additionally, there is significant developer interest in this area which is a requirement per the HCD Site Inventory Guidebook, as evidenced by pipeline projects and property owner interest expressed on opportunity sites. Developers spend significant resources researching consumer preferences and would not move forward with multi-million-dollar projects if the demand for both the product type and the location was not there.

Other Public Comment

Emails Received by City Through March 2023

Irlanda Martinez

From: Roscoe Mata <RMata@ci.millbrae.ca.us>
Sent: Monday, September 19, 2022 6:12 PM
To: Hitta Mosesman; Irlanda Martinez
Cc: Nestor Guevara; Carmen Soulette; Christy Barberini
Subject: FW: 9/19 Planning Commission Public Comment: Housing Element

Team,

Please see below for correspondence we just received. Should we jump on a quick call to coordinate the response?

Roscoe Mata
Planning Manager
Community Development
621 Magnolia Avenue | Millbrae, CA 94030
Tel. (650) 259-2416 | Rmata@ci.millbrae.ca.us

Stay up to date and connect with us:

From: Jeremy Levine <jlevine@hlcsmc.org>
Sent: Monday, September 19, 2022 5:48 PM
To: Roscoe Mata <RMata@ci.millbrae.ca.us>
Subject: 9/19 Planning Commission Public Comment: Housing Element

Good evening to the Millbrae Planning Commission and staff,

Thank you for your time and dedication to serving the City of Millbrae. I hope I'm not writing too late!

I am writing today to share preliminary notes that I jotted while giving Millbrae's housing element a first pass through. The Housing Leadership Council will send a longer, more developed letter to the city of Millbrae early next month. For now, some initial comments:

- Site inventory has a lot of good sites! Not all are equal, but most are decent. Densities on selected sites could be higher, but current densities leave opportunity for a range of development types
- Limited public engagement, poor AFFH outreach. Does not seem to have consulted with many stakeholders, particularly groups with special housing needs, in a meaningful way. City should plan focus groups, meet directly with 21 Elements Equity Advisory Group, consult affordable housing developers, and take other actions to better inform constraints analysis and programs.
- Constraints analysis does not adequately consider how Cal High Speed Rail might affect development patterns
- Sites inventory does not describe CalHSR for many relevant sites, particularly the Monte Serreno site. More analysis required to justify site; city may need to make up 488 unit shortfall elsewhere and should start planning now to do so if the first draft is not accepted by HCD.
- Site inventory seems to use arbitrary affordability projections for nonvacant sites; city should provide stronger justification for its affordability assumptions or implement new programs, identify new sites.
- Several programs don't seem fully fleshed out, won't have much impact, lack metrics or substantial actions
    - HIP-18, Encourage and Incentivize ADUs, offers streamlined plan review, but doesn't have enough policies and programs. Could do preapproved ADU plans, fee waivers for deed restricted units, 2nd units on large lots

- HIP-27, “Update Density Bonus Ordinance,” has significant potential to build on good statewide policy. Great potential program, should have metrics!
- HIP-28, “Anti-Displacement Measures,” doesn’t have much traction. I expect the Anti-Displacement Coalition will send a just cause for eviction letter to the city, and I hope Millbrae implements some of their recommendations.
- HIP-32, “Local Funding for Affordable Housing,” references commercial linkage and housing in-lieu fees, but housing element does not mention money raised or funding projections. Program should specify funding expectations and commit to regular RFP

I will send a longer letter on behalf of the Housing Leadership Council early next month.

Thank you again for your consideration,
Jeremy
--
Jeremy Levine (he • him)
Policy Manager
Housing Leadership Council of San Mateo County
2905 El Camino Real
San Mateo, CA 94403
www.hlcsmc.org
650.242.1764

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City of Millbrae
621 Magnolia Ave
Millbrae, CA 94030

To the honorable Millbrae City Council,

The Housing Leadership Council (HLC) appreciates this opportunity to comment on the city of Millbrae'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.

Concurrent with its General Plan 2040 update, Millbrae's current draft housing element proposes a number of ambitious programs to promote housing development. Of particular note, the housing element proposes substantial upzonings that will unlock new capacity in Millbrae's downtown and along the El Camino Real Corridor. The introduction of the Downtown and El Camino Real Specific Plan represents the efforts of Millbrae's city council, staff, and community at large over many years to promote affordable homes.

Nonetheless, Millbrae faces new challenges planning for housing, particularly because the city's new RHNA requirement is much larger than in past cycles. Over the 5th RHNA cycle, Millbrae fell far short of its goals for very low-, low-, and moderate-income housing. At the same time, the housing need has increased tremendously. Rents in Millbrae have almost doubled, from $1,300 in 2009 to over $2,300 today; since 2002, median home prices have increased from less than $800,000 to more than $1.6 million. In the 6th RHNA cycle, the city will need to plan ambitiously in order to accomodate the increased local housing need.

This letter provides proposals for changes and additions that will enable Millbrae to meet its housing obligations for all residents regardless of income. The first part of this letter examines Millbrae's site inventory analysis, which is largely exemplary but has some areas to improve. The next part considers the constraints analysis, identifying any ongoing constraints that may limit housing on Millbrae's proposed sites. The final section evaluates Millbrae's goals, policies, and programs and offers recommendations for changes and additions.

Site Inventory for New Homes

The site inventory requires cities to demonstrate that they have adequate locations with the necessary policies in place to produce the RHNA allocations. Recent changes to state law require cities to meet a higher burden of proof for parcels planned to include 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 Millbrae.[1]

In order to demonstrate capacity to meet its RHNA goals, Millbrae's housing element proposes 1,701 units will come from pipeline projects, 112 units from ADUs, and 2,048 units from opportunity sites in its corridor mixed use and residential mixed use zones.[2] Many of the city's projections for overall site capacity, bolstered by a substantial upzoning program, are realistic.

Most impressively, Millbrae provides site-specific analysis for every opportunity site, with supporting evidence for each site. Though HLC does not believe Millbrae provides sufficient analysis for all of its sites, it does so for most of them. Providing analysis in the first place is more than most cities do! Among many strengths, the draft housing element's site inventory justifies the inclusion of non-vacant sites from the prior planning period, none of which are counted toward lower-income housing.[3]

Housing elements must also calculate the realistic capacity, the expected proportion of zoned density that will actually be built, for each site. Millbrae's draft housing element uses past data to justify the use of 85% of max zoned density for sites located within its mixed use zones and 100% of realistic capacity for sites located within its residential zoned districts, as is described in the housing element.[4] This seems to be a realistic estimate reflecting HCD guidance.

Several non-vacant opportunity sites would not be viable locations for affordable housing under current zoning, but Millbrae addresses these concerns with a substantial upzoning program. For example, Lucky Grocery Store would not be a viable opportunity site under current rezoning because of its preexisting use, but planned rezoning to Corridor Mixed Use justifies inclusion in the inventory.[5]

Nonetheless, Millbrae could strengthen its housing element further by providing more analysis and potentially changing policies to justify the inclusion of some sites in the inventory:

- **For Opportunity Site 7, 979 Broadway**, the housing element describes a two-story mall with a number of businesses.[6] The housing element notes "a portion of the second story of the site is currently listed for lease on LoopNet, a leading commercial real estate website." However, the city should investigate the tenure of other leases in the mall and the willingness of businesses to move.
- **For Opportunity Site 9, Magnolia Ave Parking Lot**, the housing element claims "The site is 100% parking lot, and the property owner has expressed serious interest in development, inquiring with the City regarding zoning and potential redevelopment."[7]

[1] HCD's Site Inventory Guidebook, p. 27
[2] Draft housing element, p. 233
[3] Draft housing element, p. 257
[4] Draft housing element, p. 268
[5] Draft housing element, p. 307
[6] Draft housing element, p. 299
[7] Draft housing element, p. 300

However, the housing element does not present documentation or define "serious interest." The housing element should provide evidence to support its sites.

- **Opportunity Sites 10 and 11** have similar issues to opportunity site 9: ill-defined property owner interest. The draft housing element should provide supporting evidence demonstrating the veracity of its claims.
- **Opportunity Site 17, 150 Serra Avenue**, is slated for conversion to a rail station by the California High Speed Rail Authority. Millbrae's housing element ignores this thoroughly documented constraint to housing, which will influence the usability of the site. The site has a number of other complicated constraints not described in the housing element, which must be identified and addressed before it should be considered an opportunity site.

Lastly, Millbrae's affordability assumptions for its sites would benefit from stronger justification. Non-vacant parcels located within the same zoning district are projected to have very different levels of affordability, with no apparent explanation. For example, site 10, 537 Broadway, is slated to be 28% low- and very low-income units, whereas site 14 is slated to become 100% very low-income housing. HLC does not know of any large 100% very low-income housing projects anywhere in San Mateo County. In general, Millbrae's affordability assumptions seem divorced from reality: Most of Millbrae's pipeline projects features less than 10% very low-income or less than 20% low-income units; very few proposals have a higher proportion of either. More analysis or new policies may be needed to support Millbrae's affordability assumptions.

In order to improve its site inventory, Millbrae can identify new sites in new locations as well as strengthen its policies and programs to better promote affordable housing on existing sites.

Constraints to Housing

The housing element requires jurisdictions to provide an analysis of governmental and nongovernmental constraints to housing production. Along with the needs analysis, the constraints analysis is the foundation of the housing element, indicating the policies and programs that are necessary to make housing development viable on the city's opportunity sites. In this section, HLC will review Millbrae's constraints analysis, identifying any

By and large, Millbrae's draft housing element constraints analysis seeks to justify prevailing conditions rather than identify constraints and remove them. The housing element claims "The primary nongovernmental constraint to the development of affordable housing (very low-, low- and moderate-income housing) is the overall cost of affordable housing development (high land and development costs) and the lack of public funding sources to subsidize the development of these units" but does not provide adequate supporting evidence.[8] Of course high costs are a constraint. The question is whether or not city policies contribute to those high costs. Millbrae's draft housing element does not fully evaluate the impact of its own policies on costs.

[8] Draft housing element, p. 109

For example, Millbrae describes its design review process but does not analyze it as a constraint. According to the housing element, "Every application for the construction, alteration, or exterior modification of a building is subject to design review," requiring planning commission approval.[9] The planning commission's considerations include such subjective criteria as "The proposal is not detrimental to the orderly, harmonious, and safe development of the City and will not impair the desirability of investment or occupation in the neighborhood in which the building or structure is proposed to be erected." The subjectivity of Millbrae's process has obvious impacts on development costs: According to the housing element, design review typically takes 12-14 months for multi-family housing proposals, an unjustifiable delay to impose.

In fact, Millbrae's entire permitting process poses a constraint on housing. The housing element presents data regarding permitting, but does not analyze as a constraint. As described in the housing element, the city's entitlement process is unusually long relative to other jurisdictions, with combined time for permitting taking an optimistic minimum of 12 months, a timeline that more than doubles on parcels outside of Millbrae's specific plans![10]

Table 3-13. Timelines for Entitlement Procedures

TYPE OF APPROVAL OR PERMIT	TYPICAL PROCESSING TIME (BASED ON WORKING DAYS)
CUP	3 to 6 months
Zone Change (not needed for any site inventory sites)	12 to 15 months
Design Review	6 to 8 months
Conceptual / Precise Site Plan (Planned Developments)	6 to 9 months
Site Development Plan (MSASP) (unlikely for Site Inventory properties)	6 to 9 months
General Plan Amendment (not needed for any projects at site inventory sites that are consistent with applicable development standards)*	12 to 15 months
Environmental Impact Report (not needed for any projects in the Specific Plan area at site inventory sites, and which are consistent with Specific Plan development standards)**	15 to 18 months

** General Plan Amendments are highly unlikely in either of the specific plan areas, which are already set up to allow dense development.*
*** Environmental Impact Reports are prepared for the specific plans, which already contain the impacts of future development in their analyses.*
***Source**: 21 Elements Constraints Survey, December 2021; City of Millbrae, 2022*
***Note:** Subdivision review is included within the time frames indicated in this table.*

Millbrae's fees also likely pose a constraint to housing. Again, the city presents data but does not provide any analysis. Millbrae charges some of the highest fees in San Mateo County, including the second highest fees on large multi-family and the third highest fees on small multi-family.[11] Millbrae claims the rising cost of "land, labor, and materials" justifies higher fees. Maybe so, but that does not mean Millbrae's fees are not a constraint on new development. Costs have also "skyrocketed" for housing developers. It does not matter that Millbrae has a new nexus study; relative to other jurisdictions, Millbrae's fees are exceptionally high and should be directly addressed in the goals, policies, and programs.

[9] Draft housing element, p. 153
[10] Draft housing element, p. 152
[11] Draft housing element, p. 150

Many aspects of Millbrae's development standards pose a constraint to new housing, but, again, these standards are not properly analyzed in the housing element. For example, the housing element makes unqualified statements without supporting evidence: "Properties in the MSASP [Millbrae Station Area Specific Plan] do not have minimum lot area standards. This allows for a range of housing options in Millbrae (Table 3-5)."[12] Elsewhere in Millbrae outside of the MSASP, minimum lots sizes range from 6,000 square feet to over 10,000 square feet. The MSASP only covers a narrow area of Millbrae; most of the city does not, in fact, allow a range of housing options.

The unsupported assertions continue. For example, Millbrae claims "The maximum FAR in the MSASP ranges from 2.0 to 2.5. In the TOD zone, the maximum FAR may be lifted in exchange for community benefits. This is not a constraint on development."[13] This is not a legitimate analysis, it is an arbitrary dictate. The TOD zone allows developments of 80 du/ac and at least 65 feet height; it is hard to imagine that a FAR of 2.5 is not a constraint on development under these conditions. The city should present evidence indicating that development proposals in its TOD zone never request FAR reductions, which would actually indicate that its FARs are not a constraint, or the city should implement a program to increase FARs. The draft housing element makes similarly unsupported claims regarding low FARs in the Downtown and El Camino Real Specific Plan.

At times, the housing element deflects responsibility for addressing constraints away from Millbrae rather than proactively identifying strategies by which constraints can be removed. For example, the draft housing element identifies "Lack of Federal and State Funding and Subsidies for Affordable Housing" as a constraint, but does not evaluate lack of local funding and subsidies, which Millbrae can actually influence.[14]

At the end of its constraints analysis, Millbrae includes a unique "Reductions to Constraints" section that directly connects identified constraints to policies and programs.[15] This is an excellent feature of Millbrae's housing element that makes evaluating the city's policies and programs much easier. Unfortunately, because several constraints to housing go unrecognized and need to be addressed, this section will need to be significantly amended so as to address the constraints to housing present in Millbrae.

Housing Plan: Goals, Policies, and Programs

In the following section, HLC describes how Millbrae can strengthen its housing element programs to more effectively remove identified housing constraints and promote low- and very low-income housing. The city already has a number of strong policies and programs in place. However, several programs that would otherwise be adequate lack clear deliverables and

[12] Draft housing element, p. 129
[13] Draft housing element, p. 131
[14] Draft housing element, p. 116
[15] Draft housing element, p. 180

metrics, while others do not have adequate supporting actions to address the program's stated intent. Some opportunities to promote affordable housing go unconsidered.

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]

As released for public comment, Millbrae's draft housing element has several policies that meet these criteria, for which the city merits recognition. In particular, HIP-17, "Rezone for Lower Income Sights," includes a legally compliant timeline for planned rezonings in Millbrae's downtown area and El Camino Real corridor.[18] The majority of programs have clear timelines for implementation.

Still, some programs use vague language without clear metrics for success. Other programs do not have adequate supporting actions to support the programmatic goals. Occasionally, programs propose actions that may be contradictory to the intent of a housing element, i.e. planning for new homes and removing constraints to their development. Revisions recommended by the Housing Leadership Council include:

- **HIP-13, "Replacement Housing for Existing Lower Income Units on Sites for Residential Development,"** describes well-intentioned strategies that could pose a constraint to the city's pipeline projects. The housing elements claims "City will require an agreement provided by the City … to ensure the replacement of lower income units" at the 1100 El Camino Real and 230 Broadway projects in order for them to receive building permits.[19] Rather than pushing unfunded costs onto the developer, HLC recommends Millbrae offer incentives in exchange for the preservation of affordable homes. Strictly requiring a replacement affordable unit for the 230 Broadway project would render many six-unit projects infeasible, particularly considering Millbrae's onerous in-lieu fees for small projects.[20]
- **HIP-14, "Conduct a Residential Development Feasibility Study,"** should commit to waive or defer fees for affordable units to low- and very low-income households and units geared toward special needs populations, including the disabled and large families. A nexus study is not required.
- **HIP-18, "Encourage and Incentivize ADUs,"** offers streamlined plan review, but doesn't have enough policies and programs to justify Millbrae's somewhat inflated ADU

[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
[18] Draft housing element, p. 332-333
[19] See bottom of page 326-327
[20] Draft housing element, p. 164

estimates. (The housing element's ADU calculations do not account for ADU development trends in 2018, when it appears 0 ADUs were approved.[21]) HLC recommends additional policies, including
    - Creation of preapproved ADU designs, which can be modeled off of successful programs in San Jose and various cities in San Mateo County.
    - Waive impact fees for ADUs with 99-year deed restriction for low- and very low-income housing.
- **HIP-23, "Prioritize Review and Expedite Development of Affordable and Special Needs Projects,"** promises to formally expedite review for "Affordable and Special Needs Projects." This program should have needs metrics for success, including data on current processing times for such housing, goals for reducing processing times, and a plan to ensure that processing times do not decrease for other types of applications. HLC proposes an additional program to expedite processing times later in this section.
- **HIP-27, "Update Density Bonus Ordinance,"** says "The City's ordinance may offer a greater density bonus than allowed by the default state standards." This should be revised to make a concrete commitment to additional incentives for affordable housing. This could be modeled off of San Carlos, which allows a larger unit bonus for lower income units than the state density bonus requirements.[22]
- **HIP-28, "Anti-Displacement Measures,"** claims that "The City's primary displacement prevention strategy is facilitating the development of affordable housing in the community so that housing is more affordable to residents." This is not an anti-displacement strategy, it's the fundamental RHNA process.
- **HIP-32, "Local Funding for Affordable Housing,"** references commercial linkage and housing in-lieu fees but does not describe funding raised to date, projections of future funding, or a clear plan for allocating funding once it becomes available.[23] The housing element can address these issues by
    - Elaborating on projected revenue from commercial linkage and housing in-lieu fees.
    - Setting aside a predetermined proportion of funding from commercial linkage fee for affordable housing, with a predetermined goal for revenue generation that will be supplemented by other city funds if unmet.
    - Commit to issuing a NOFA when funding goals are meeting
    - Commit to a "failsafe" action that will implement a new funding mechanism if revenue raised by in-lieu and commercial linkage fees is insufficient.
- **HIP-36, "Funding, Incentives, and Concessions for Extremely Low-Income Developments,"** needs more supporting actions. The program describes potential funding and technical assistance, but does not provide many incentives or concessions. Funding goals are unclear.

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[21]

[22] San Carlos's current City Density Bonus allows "Residential rental developments with one (1) or more on-site below market rate units that are affordable to very low-income households, or to a lower income category, may be granted four (4) additional units for each unit affordable to very low-income households or to a lower income category." The San Carlos draft housing element is also undergoing revisions to allow use of city density bonus concurrently with state density bonus.

[23] Draft housing element, p. 339

Furthermore, several constraints that were not adequately identified and analyzed in the draft housing element's constraints analysis must be addressed. Programs should be added to address:

- **Permit processing times**: Millbrae should extend by-right and ministerial review to projects proposed within its specific plan areas as well as all other opportunity sites. For all other developments, the city should commit to reducing permit processing times by at least 50%, which can be accomplished by implementing clearer objective standards and form based codes.
- **Design review**: Eliminate design review for 100% affordable housing proposals anywhere in Millbrae and all housing proposals located within the Millbrae specific plan areas. Commit to reducing permit processing times by at least 50%, which can be accomplished by implementing clearer objective standards and form based codes.
- **Impact fees**: Waive impact fees for affordable units or units designed to accommodate the disabled community.
- **Financing**: As described earlier in this section, the city should specify concrete funding goals to finance affordable housing from its commercial linkage and in-lieu fees. In case those goals are not met, the housing element should include a "failsafe" program that will implement other funding measures to finance affordable homes. Furthermore, the housing element should describe the process by which funding would be allocated.

The draft housing element may benefit from adoption or adjustment of other policies as well, which HLC may recommend in the coming months.

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 Millbrae 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

The City of Millbrae

Via email: etran@ci.millbrae.ca.us; planning@ci.millbrae.ca.us

Cc: HousingElements@hcd.ca.gov

October 10, 2022

Re: Millbrae's Draft Housing Element

To the City of Millbrae:

YIMBY Law charges that the City's draft housing element fails to "remove governmental … constraints to the … development of housing." (Gov. Code § 65583(c)(3).) The draft lists only five programs for constraint removal, none of which seem to propose anything beyond what State law already requires**.** (See Draft, p.3-74.) No rezoning is proposed. (*Id.* p.3-46.) Elsewhere, the draft cites the ubiquity of certain constraints in other cities, such as conditional-use permitting, to illogicaly deny that they are constraints. (*E.g.*, *id.* p.3-56.) We are disappointed by the City's carelessness.

For all of the City's bluster about its status as the Bay Area's transportation hub, it appears the City does a poor job of accommodating the housing that a typical SFO or BART worker might afford. The City failed to permit its allocation of lower- and moderate-income homes in the fifth cycle. (Draft, p.1-12.) It seems that only *two* lower-income units have been *completed* in Millbrae since 2005. (*Id.* p.7-11.) Millbrae's development fees tack a bus driver's salary onto the cost of each new home. (See *id.* pp.3-35 to -36.) Acknowledging that it charges higher fees than nearby cities, Millbrae offers the bizarre excuse that its fees are higher because it recently set its fees higher. (*Id.* p.3-42 to -43.) Design review, which the City whitewashes as an "opportunity" to nitpick nonhealth concerns such as "general appearance," "character," "visual impact," "harmon[y]," and "setbacks, height, parking, density, and open space," remains

required for "[e]very application" and ties up development for either "6 to 8" or "12 to 14 months." (See *id.* pp.3-46 to -48.)

None of this seems set to change in the current draft. As with too much of San Mateo County, Millbrae's plan is simply to slap some extra density around El Camino Real and the 101 and call it a day. (See *id.* pp.3-17 to -32.) Most of the City will remain zoned to enforce wasteful lot-coverage and minimum-size requirements that ordinary people can no longer afford. (See *ibid.*) It may be a plan for some housing, but it is not a plan for enough housing. We urge the City to do better.

Please contact me with questions. We look forward to seeing the City's next draft.

Sincerely,

Keith Diggs
Housing Elements Advocacy Manager, YIMBY Law
keith@yimbylaw.org

Appendix B - Fair Housing Assessment

What is AFFH?

The State of California's 2018 Assembly Bill 686 (AB 686) requires that all public agencies in the State affirmatively further fair housing (AFFH) beginning January 1, 2019. Public agencies receiving funding from the U.S. Department of Housing and Urban Development (HUD) are also required to demonstrate their commitment to AFFH. The federal obligation stems from the fair housing component of the federal Civil Rights Act mandating federal fund recipients to take "meaningful actions" to address segregation and related barriers to fair housing choices.

AB 686 requires all public agencies to "administer programs and activities relating to housing and community development in a manner that affirmatively furthers fair housing and take no action inconsistent with this obligation."[1]

AB 686 also makes changes to Housing Element Law to incorporate requirements for AFFH as part of the housing element and general plan to include an analysis of fair housing outreach and capacity, integration, and segregation, access to opportunity, disparate housing needs, and current fair housing practices.

Affirmatively Furthering Fair Housing

"Affirmatively furthering fair housing" means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. The duty to affirmatively further fair housing extends to all of a public agency's activities and programs relating to housing and community development. (Gov. Code, § 8899.50, subd. (a)(1).)

Source: California Department of Housing and Community Development Guidance, 2021, page 14.

[1] California Department of Housing and Community Development Guidance, 2021, page 9.

History of segregation in the region. The United States' oldest cities have a history of mandating segregated living patterns—and Northern California cities are no exception. ABAG, in its recent Fair Housing Equity Assessment, attributes segregation in the Bay Area to historically discriminatory practices—highlighting redlining and discriminatory mortgage approvals—as well as "structural inequities" in society, and "self-segregation" (i.e., preferences to living near similar people).

Researcher Richard Rothstein's 2017 book *The Color of Law: A Forgotten History of How Our Government Segregated America* chronicles how the public sector contributed to the segregation that exists today. Rothstein highlights several significant developments in the Bay Area region that played a large role in where the region's non-White residents settled.

This history of segregation in the region is important not only to understand how residential settlement patterns came about—but, more importantly, to explain differences in housing opportunity among residents today. In sum, not all residents had the ability to build housing wealth or achieve economic opportunity. This historically unequal playing field in part determines why residents have different housing needs today.

Pre-civil rights San Mateo County faced resistance to racial integration, yet it was reportedly less direct than in some Northern California communities, taking the form of "blockbusting" and "steering" or intervention by public officials. These local discriminatory practices were exacerbated by actions of the Federal Housing Administration which excluded low-income neighborhoods, where the majority of people of color lived, from its mortgage loan program.

According to the San Mateo County Historical Association. San Mateo County's early African Americans worked in a variety of industries, from logging to agriculture, to restaurants and entertainment. Expansion of jobs, particularly related to shipbuilding during and after World War II attracted many new residents to 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 segregating 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 reintegration 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 the integration of communities. Although some neighborhood residents supported integration, most did not, and it was not unusual for neighborhood associations to require the 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 is 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."[2] However, "due 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."[3] The lasting influence of these policies and practices has contributed directly to the disparate housing and economic outcomes collectively experienced by Native populations today.[4]

The following page shows the timeline of major federal acts and court decisions related to fair housing choice, zoning, and land use.

As shown in the timeline, exclusive zoning practices were common in the early 1900s. Courts struck down only the most discriminatory and allowed those that would be considered today to have a "disparate impact" on classes protected by the Fair Housing Act. For example, the 1926 case *Village of Euclid v. Amber Realty Co.* (272 U.S. 365) supported the segregation of residential, business, and industrial uses, justifying separation by characterizing apartment buildings as "mere parasite(s)" with the potential to "utterly destroy" the character and desirability of neighborhoods. At that time, multifamily apartments were the only housing options for people of color, including immigrants.

The Federal Fair Housing Act was not enacted until nearly 60 years after the first racial zoning ordinances appeared in U.S. cities. This coincided with a shift away from federal control over low-income housing toward locally-tailored approaches (block grants) and market-oriented choice

[2] https://www.smcoe.org/for-communities/indigenous-people-of-san-mateo-county.html

[3] https://www.smcoe.org/for-communities/indigenous-people-of-san-mateo-county.html

[4] https://www.americanprogress.org/article/systemic-inequality-displacement-exclusion-segregation/

(Section 8 subsidies)—the latter of which is only effective when adequate affordable rental units are available.

Maps and data are referenced in this section. Throughout this section, there are references to maps created by HCD to support the AFFH and data tables created by HCD, the Association of Bay Area Governments (ABAG), and the consultant team. Those maps and tables appear throughout Appendix B and follow the organization of this section and the State guidance. The maps, in particular, are useful in demonstrating how the City of Millbrae compares with surrounding jurisdictions and the County overall in offering housing choices and access to opportunity.

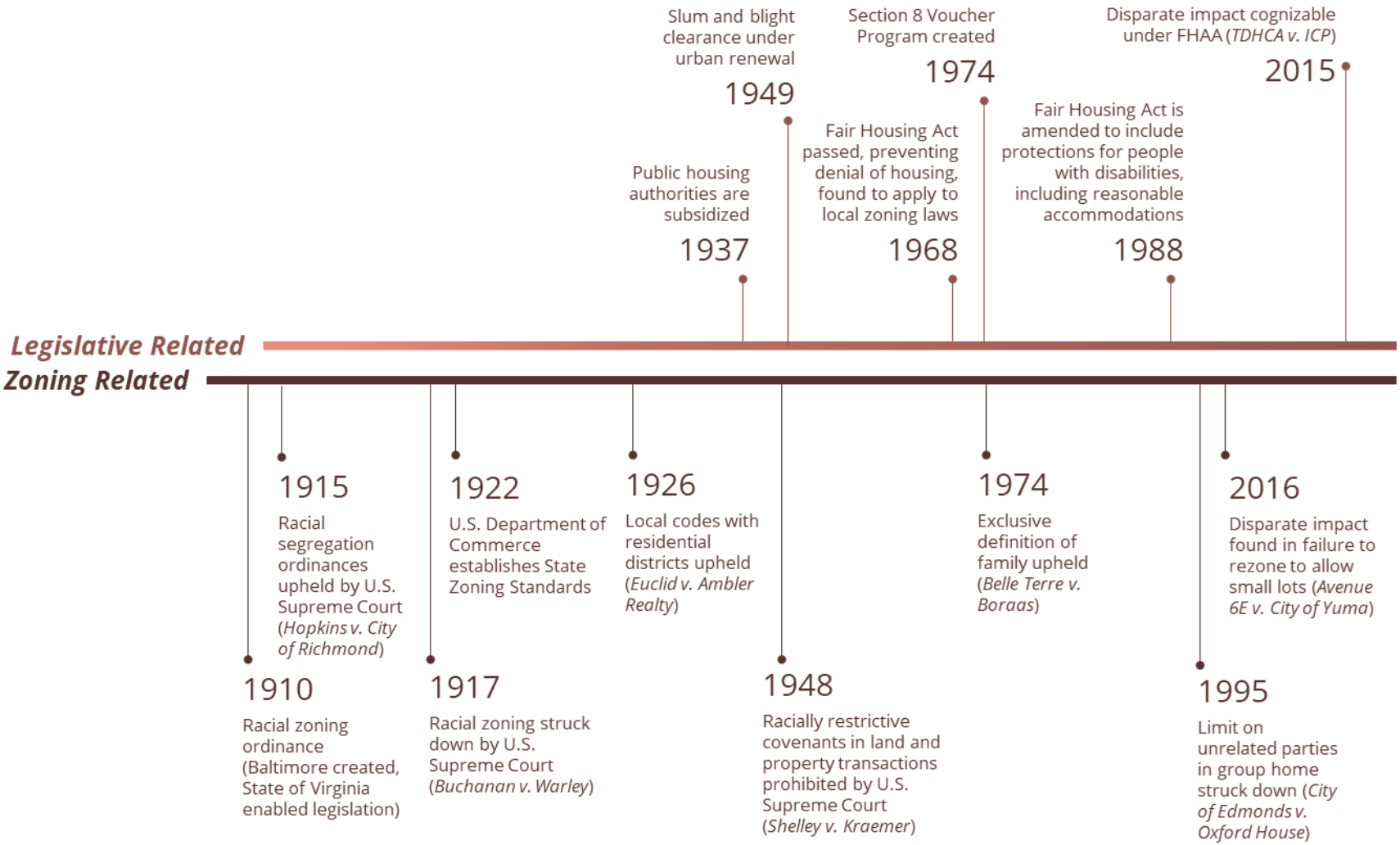
Report content and organization. This Fair Housing Assessment follows the April 2021 State of California State Guidance for AFFH. The study was conducted as part of the 21 Elements process, which helps to facilitate the completion of Housing Elements for San Mateo County jurisdictions. Harris and Associates conducted supplemental analysis related to the sites inventory and the comparison of the City to the County for several data points.

Outreach Summary describes the outreach process followed by the City to obtain input from residents, community members, community service providers, fair housing providers, affordable and market-rate developers, and other stakeholders.

Primary Findings, Contributing Factors, Fair Housing Action Plan, and Local Data and Knowledge utilize local information and insights to identify the primary factors contributing to fair housing challenges and the plan for taking meaningful actions to improve access to housing and economic opportunity.

- **Section I. Fair Housing Enforcement and Outreach Capacity** review lawsuits/enforcement actions/complaints against the jurisdiction; compliance with State fair housing laws and regulations; and jurisdictional capacity to conduct fair housing outreach and education.
- **Section II. Integration and Segregation** identify areas of concentrated segregation, degrees of segregation, and the groups that experience the highest levels of segregation.
- **Section III. Access to Opportunity** examines differences in access to education, transportation, economic development, and healthy environments.
- **Section IV. Disparate Housing Needs** identify which groups have disproportionate housing needs including displacement risk.
- **Section V. Site Inventory Analysis** examines the effects of the concentration of sites in specific areas of the City.

Major Public and Legal Actions that Influence Fair Access to Housing



Attachments

- Resident Survey Findings — findings from a survey of Millbrae and San Mateo County residents on their experience finding and remaining in housing, with comparisons to the experience of County residents overall (in Attachment A).
- Access to Education Supplement—findings from a Countywide analysis of access to education and educational outcomes by protected class (Attachment B).

Outreach Summary

Millbrae implemented a robust outreach strategy to hear from as many community members as possible. Below is a summary of engagement efforts. Complete summaries of meetings, surveys, notices, and other documentation are provided in Attachment A or through the links below.

Website and Social Media (City and County)

As a starting point for accomplishing extensive outreach, the City developed a clear online presence with all the information needed to understand the update process and how to participate in this process.

Website/Webpage and Social Media

The City established a webpage for the HEU (link provided below)

- https://www.ci.millbrae.ca.us/departments-services/community-development/planning-division/housing-element

The City also provided notices for the community workshop on various social media posts (links provided below)

- https://www.facebook.com/photo/?fbid=330330639290686&set=a.150832733907145
- https://www.facebook.com/photo/?fbid=340568268266923&set=a.150832733907145
- https://www.facebook.com/photo/?fbid=335890192068064&set=a.150832733907145
- https://www.facebook.com/photo/?fbid=340568268266923&set=a.150832733907145
- https://nextdoor.com/agency-post/ca/millbrae/city-of-millbrae/housing-element-update-community-workshop-230659123/
- https://nextdoor.com/agency-post/ca/millbrae/city-of-millbrae/housing-element-update-232254295/

Let's Talk Housing Website

To reach a broader audience and supplement the City's webpage, the Let's Talk Housing website with 21 Elements was launched in March 2021. The goal was to clearly explain what a housing element is, why it matters, and how to get involved. It was made available in Arabic, Chinese, English, Spanish, and Tagalog, designed to be responsive on all types of devices, and included accessibility features. As of January 2022, the website has been viewed more than 17,000 times, with more than 20% occurring from mobile devices. Let's Talk Housing Facebook,

Instagram, Twitter, and YouTube accounts were also created and maintained to keep people informed about upcoming or past events.

Informational Videos on the Housing Element Update

After completing a series of introductory Meetings to the Housing Element Update (see below), we supported 21 Elements in developing shorter 4-minute snippets to ensure information was more accessible and less onerous than watching an hour-long meeting. Two videos were produced–What is a Housing Element and How it Works and Countywide Trends and Why Housing Elements Matter–in Arabic, Chinese, English, Spanish, and Tagalog. They were made available on the Let's Talk Housing YouTube channel and website and shared on social media.

Public Meetings and Hearings

The City held and participated in a variety of meetings to inform the public about the Housing Element and hear what matters to the community.

Introductory Meeting to the Housing Element Update (County)

The City helped develop and facilitate a 90-minute virtual countywide meeting about the Housing Element update. Held in March 2021, the meeting provided community members with an introduction to the Housing Element update, why it matters, information on the Let's Talk Housing outreach effort, and countywide trends. Breakout rooms were also provided for discussion with community members on housing needs, concerns, and opportunities, and answered any questions. A poll was given during the meeting, to identify who was joining us and more importantly who was missing from the conversation, including if they rent or own, who they live with, their age, and ethnicity. Time for questions was allotted throughout, and meeting surveys were provided to all participants after the meeting along with all discussed resources and links.

In total six introductory meetings were held across the County between March and May 2021, and 1,024 registered for the series. Of those who registered, the majority identified as White (66%) or Asian (15%) and were 50 years or older; nearly half were 50 to 69 years old and almost a fifth were over 70. Almost half had lived over 21 years in their homes and three-fourths owned their homes. A meeting summary is provided in Attachment A.

All About RHNA Webinar (County)

A webinar with 21 Elements was held in April 2021 to provide information and answer community questions about the RHNA process. 264 people registered and 80 questions were answered over three hours. The recording of this meeting and the FAQ can be found here.

Community Workshop (City only)

The City hosted a virtual community workshop on June 30, 2022. The workshop was publicized on June 22, 27, and 30, 2022 via the City's Facebook, Twitter, and Nextdoor accounts. The workshop flyer was also posted on the City's website, on the City's Rec Center lobby screen, and throughout City Hall. A total of 15 people attended (10 community members and five city staff/consultants). The presentation involved live polling to receive additional input. Poll results indicated that affordability and location of housing (lack of housing near transit and jobs in the downtown area) were the primary issues of concern. Questions during the workshop were focused on affordable housing, ways for the community to participate in the process, and what assurances are in place that housing will be implemented.

Stakeholder Listening Session Series (County)

The City joined 21 Elements for a facilitated series of listening sessions held between September and November 2021 to hear from various stakeholders who operate countywide or across multiple jurisdictions. The four sessions convened more than 30 groups including fair housing organizations, housing advocates, builders/developers (affordable and market-rate), and service providers, to provide observations on housing needs and input for policy consideration.

Summaries for each session can be found here. Key themes and stakeholder groups included:

Fair Housing: Concern for the end of the eviction moratorium, the importance of transit-oriented affordable housing and anti-displacement policies, and the need for education around accessibility regulations and tenant protections. Eight (8) stakeholder groups provided this feedback, including 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: Concern for rent increases and the need for ongoing outreach to underserved and diverse communities, workforce housing, deeply affordable and dense infill, and tenant protections for the most vulnerable. Six (6) stakeholder groups provided this feedback, including 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: Local funding, tax credit availability, and concern that appropriate sites limit affordable housing while sites, construction costs, and city processes limit market-rate housing. Twelve (12) stakeholder groups provided this feedback, including 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: More affordable housing and vouchers or subsidies for market-rate housing are needed, along with on-site services and housing near transit, and jurisdictions should work with providers and people experiencing issues before creating programs. Ten (10) stakeholder groups provided this feedback, including 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

Focused Stakeholder Meetings (City only)

The City made substantial efforts to engage local developers, service providers, and housing advocacy groups to determine needs, challenges, and opportunities related to housing in Millbrae. The City invited more than 50 groups to participate (as shown in the following table – all organizations listed were invited and those highlighted in yellow participated). The participants in the three meetings held for stakeholder groups are highlighted in yellow.

Invited	Participated
Affordable Housing Developers	
1301 Broadway Development	No
Sand Hill Property Company	No
Affirmed Housing	No
BRIDGE Housing	No
Eden Housing	No
Habitat for Humanity— Greater SF	Yes
HIP Housing	No
Housing Choices	Yes
Mercy Housing	No
MidPen Housing	No
The Core Companies	Yes
Architects	
Architecture International, Ltd. - 150 Serra	No
DB Architects - 130-140 El Camino Real	No
HOK - 150 Serra	No
Market Rate Developers	
130-140 El Camino Real	No
Anton Development	No
Greystar	Yes
Muzzi Developments	Yes
Republic Urban	No
Sand Hill Property Company	No
Sares | Regis	No
Summerhill Apartment Communities	Yes
Trammell Crow	Yes
Affordable Housing Service Providers	
Ayudando Lations A Soñar (ALAS)	No
Center for Independence of Individuals with Disabilities	Yes
Community Legal Services in East Palo Alto (CLSEPA)	No
El Comite de Vecinos del Lado Oeste (El Comite)	No
EPACANDO	No
Faith in Action	No
Greenbelt Alliance	No
HEART of San Mateo County	No
Home for All	No
Housing Authority of San Mateo County	No
Housing Equality Law Project	No
Housing Leadership Council	No
Legal Aid for San Mateo County	No
Lifemoves	No
Menlo Together	No
Nuestra Casa	No
One San Mateo	No
Peninsula for Everyone	No
Project Sentinel	Yes
Public Interest Law Project	No
Puente de la Costa Sur	No
Root Policy Research	No
San Mateo County Association of Realtors	No
San Mateo County Central Labor Council	No
San Mateo County Health	No
Self-Help for the Elderly San Mateo County	No
Youth Leadership Institute	No
Youth United for Community Action	No

The minutes from this meeting are included in Appendix A of this Housing Element. Local housing needs and solutions were discussed, and the themes and suggested programs are summarized below. Those suggestions that are within the City's control and are not current programs and policies are included below. The actions that the City is currently taking are provided in parentheses after each item (if applicable).

Affordable Housing Developers

- Consider reducing setbacks by 10 feet allowing more efficient use of a project site *(The City is currently in the process of adopting the Downtown El Camino Real Specific Plan (DECRSP) to modify zoning and development standards, and encourage development – adoption is expected in December 2022. The majority of the HEU sites are located in this area. The City also updated the Millbrae Station Area Specific Plan (MSASP) in 2016 to update zoning and development standards).*
- Increasing allowed density, decreasing parking requirements, and offering pre-development funding *(the DECRSP increases allowed density in the area where the majority of HEU sites are located and modifies parking requirements given the close location to transit).*
- Clarifying review periods for formal projects *(the review periods are described in detail in Chapter 3, Housing Constraints of this HEU).*
- Deferring the payment of fees to the time a certificate of occupancy is issued.
- Additional streamlining to push the project forward with any special consideration for affordable projects *(streamlining included in Chapter 8, Housing Plan)*.

Housing Advocates/Service Providers

- Coordinate with the County on voucher accessibility *(included in Chapter 8, Housing Plan)*.
- Support Inclusionary Housing fees through the City's current inclusionary housing requirement.
- Incentivize the development of extremely low-income housing (consider ADU financing program) (*included in Chapter 8, Housing Plan).*
- Waving park and in-lieu fees for affordable housing developers.
- Offer incentives and concessions to density bonuses and inclusionary housing *(included in Chapter 8, Housing Plan)*.
- Work with faith-based organizations to facilitate the development of housing for developmentally disabled individuals.
    - Develop housing near transit *(all site inventory sites are near transit)*
    - Individuals with developmental disabilities along with those at extremely low incomes are often transit-dependent. Access allows more independence and connectivity to the community, employment opportunities, services, etc. *(all site inventory sites are near transit, and Chapter 8, Housing Plan, includes supporting employment opportunities and services)*
- Lower parking requirements for affordable housing developments that are near transit areas *(the DECRSP increases allowed density in the area where the majority of HEU sites are located and modifies parking requirements given the close location to transit).*

- Encourage a mix of unit sizes (e.g., a 2-bedroom can accommodate a live in-aid or families).
- Accessibility modifications for affordable housing for persons with disabilities.

Market Rate Developers

- Consider parking reductions and increasing density (up to 150 units/acre) to address shallow/smaller lot sizes *(the DECRSP increases density in the area where the majority of HEU sites are located and modifies parking requirements given the close location to transit).*
- Development and other fees are high – consider reductions/deferrals.
- Residential projects on parking lots are good development opportunities *(several of the housing element sites are currently used as parking lots).*
- Mixed-use requirements on shallow parcels can be challenging.
- 100-150 units/acre is the ideal density *(the DECRSP and MSASP include densities up to 130 units/acre. Nearly all site inventory sites are within these 2 specific plan areas).*

Creating an Affordable Future Webinar Series

The City and 21 Elements offered a 4-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 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 for connection, and debrief discussions. Participants were eager to discuss and learn more about housing challenges in their community. The participants 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, though some were focused on the need for new affordable housing. There was a lot of interest in seeing more housing built (especially affordable housing), concern about change or impact on schools, parking, and quality of life, and personal struggles with finding housing that

is affordable and accessible. Some participants wanted more in-depth education and discussion of the next steps, while others had more basic questions they wanted to be answered.

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. For more information, see the Summary here.

Other Outreach Activities

The City set out to collect as much feedback as possible from the community, from their general concerns and ideas to where new housing could go. It was also important to us to consider community outreach best practices and consult and partner with organizations working in the community, to ensure we were reaching as many people as possible and doing so thoughtfully.

Community Survey (City only)

The City provided a community survey between June 16, 2022, and August 3, 2022, with a total of 61 respondents (complete survey results are in Attachment A). The results of the survey indicate the following (the City's current actions as well as those actions contained in Chapter 8, Housing Plan are provided below in parathesis):

- Majority are satisfied with their housing choices.
- Affordability is the biggest housing issue.
    - To address housing, the top two programs were rezoning to allow for higher density and conversion of commercial to residential and facilitate ADUs *(all of these are included in Chapter 8, Housing Plan).*
    - To remove barriers to housing, streamline development, and require that affordable units be part of more projects *(included in Chapter 8, Housing Plan).*
- Almost half of the respondents feel burdened by pollution and noise from the San Francisco Airport *(the City, both individually and working with regional agencies, has adopted plans and mitigation measures to address impacts from SFO including Climate Action Plans. Chapter 8, Housing Plan, contains programs to address environmental factors).*
- Existing Fair Housing services are not adequate (58%) *(Chapter 8, Housing Plan, contains fair housing programs)*.

Affirmatively Furthering Fair Housing Survey (County)

A resident survey was conducted in 2021 of San Mateo County residents to support the AFFH analysis of Housing Elements. It explores residents' housing, affordability, and neighborhood challenges and experiences with displacement and housing discrimination. The survey also asks about residents' access to economic opportunity, captured through residents' reported challenges with transportation, employment, and K-12 education. The survey was offered in both English and Spanish.

The resident survey was available online, in both Spanish and English, in a format accessible to screen readers, and promoted through jurisdictional communications and social media, and partner networks. A total of 2,382 residents participated with 55 from Millbrae.

The survey instrument included questions about residents' current housing situation, housing, neighborhood and affordability challenges, healthy neighborhood indicators, access to opportunity, and experience with displacement and housing discrimination.

The full survey results are provided in Attachment A. The issues identified in Millbrae include the following:

- Millbrae, Belmont, and Redwood City residents report being more reticent to request a repair to their unit in fear that their landlord will raise their rent or evict them.
- Residents in Daly City and Millbrae are more likely to report that they do not feel safe in their neighborhood or building.
- Daly City, Millbrae, San Mateo, and East Palo Alto residents were more likely to identify the lack of job opportunities available in their neighborhoods.
- Jurisdictions with the highest percentage of respondents who seriously looked for rental housing include Millbrae (74%), San Mateo (73%), and Redwood City (72%).
- Millbrae residents experience the greatest difficulty paying their property taxes among jurisdictions in San Mateo County.
- Millbrae, San Mateo, and Redwood City had the highest percentage of respondents who seriously looked for ownership housing. If denied, the reasons included:
    - Real estate agent told me I would need to show I was prequalified with a bank (29%) and a bank would not give me a loan to buy a home (23%).
- 21% of Millbrae respondents reported that *the real estate agent would not make a disability accommodation when I asked*.
- Residents in Redwood City, Millbrae, and South San Francisco, as well as large households, also reported that *a bank or other lender charged me a high interest rate on my home loan* as a reason for denial.
- Millbrae, Brisbane, and Pacifica residents are also more likely than other respondents to have been displaced due to an unsafe housing situation (e.g., domestic assault, harassment).
- 45% of Millbrae respondents answered that better lighting and 42% of City respondents answered that reduced crime could improve a respondent's neighborhood situation.
- 29% of Millbrae respondents identified that having better teachers at their schools would improve the education situation in their respective households.

It is important to note that Chapter 8, Housing Plan, contains 17 programs to address improved fair housing support, increased affordable housing, and improved educational outcomes in response to the findings identified as part of the survey.

Equity Advisory Group

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. A stipend of $1,500 was originally provided for meeting four to five times over 12 months to advise on Housing Element outreach and help get the word out to the communities they work with.

After meeting twice in 2021, it was decided the best use of the EAG moving forward would be to provide more focused support in 2022 based on jurisdiction needs and organization expertise. To date, 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 in their communities. The EAG continues to work collaboratively with jurisdictions and deepen partnerships, as well as connect community members to the Housing Element Update process. All participating organizations are featured on the Let's Talk Housing website and include the following:

- Ayudando Latinos 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

Primary Findings

This section summarizes the primary findings from the Fair Housing Assessment for the City of Millbrae including the following sections: fair housing enforcement and outreach capacity, integration and segregation, access to opportunity, disparate housing needs, and contributing factors and the City's fair housing action plan.

1. **Nearly two out of every five (38%) households in the City of Millbrae are housing cost-burdened—spending more than 30% of their income on housing costs. Renters**

are more likely to be cost-burdened, with 43% of renter households cost-burdened and 23% extremely cost-burdened—spending more than 50% of their income on housing costs (Figure IV-9). Black, American Indian, and Hispanic households are also the most likely to experience housing cost burden in Millbrae (Figure IV-14). **However, households in the City of Millbrae are less cost-burdened in most cases when compared to surrounding cities including Burlingame, Hillsborough, San Bruno, San Mateo, and South San Francisco. This problem is more regional than specific to Millbrae itself (Figures IV-11, IV-13, and IV-16).**

2. **5% of fair housing complaints filed in San Mateo County from 2017 to 2021 (57 total) were in the City of Millbrae (3 total – averaging less than one per year).** The most common issues cited in the City were refusal to rent and discriminatory acts under Section 818 (e.g., coercion). However, there are no fair housing lawsuits currently in the City.

3. **Unemployment is disproportionately high among residents living with a disability at 11% compared to 3% for residents without a disability in the City of Millbrae**—particularly when compared to the County. High unemployment rates among this population points to a need for increased services and resources to connect this population with employment opportunities (Figure III-25). Unemployment results in lower incomes which in turn makes housing costs unaffordable.

4. **Geospatially, there are no concentrations of low-income households or racial or ethnic minorities—except for a slight concentration of Asian households in the northeast area of the City. There are also no concentrations of racial concentrations of affluence in Millbrae.** However, the northeast area of the City has greater shares of renters using housing vouchers (Figure I-7), low- or moderate-income households (Figure II-29), households vulnerable to displacement (Figure IV-32), and concentrations of renter households (Figure IV-34).

5. The City of Millbrae has a **slight concentration of residents with a disability with 9% of the population compared to 8% in the County** (Figure III-21). Residents living with a disability in the City are more likely to be unemployed and there is one census tract with a concentration of the population living with a disability (between 10% and 20%). This census tract is centrally located and contains municipal services such as the Millbrae Library, Millbrae Community Center, bus stops along El Camino Real, and neighborhood businesses. Finally, the aging population is putting a strain on paratransit access Countywide.

6. While learning proficiency is improving, racial and ethnic minority students in the City of Millbrae—served by the San Mateo Union High School District and the Millbrae 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** (Attachment B - Disparate Access to Educational Opportunity).

Contributing factors and Fair Housing Action Plan. The disparities in housing choice and access to opportunity discussed above stem from historical actions, socioeconomic factors that limit employment and income growth, the inability of the broader region to respond to housing demand, regional barriers to open housing choice, and, until recently, very limited resources to respond to needs.

1. **Fair housing issue: A lack of housing choices resulting from a lack of affordable housing.**
   Contributing factors:
   - **High proportion of cost burdened households.**
   - **Overcrowding.**
   - **Shortage of affordable rental and homeownership options.**
2. **Fair housing issue: Displacement risk in the northeast census tracts in the City east of Magnolia Avenue where the concentration of low- and moderate-income households, voucher holders, and Asian households is located. This area has a high owner and renter cost burden, and higher rates of overcrowding compared to the rest of the City and surrounding County.**
   Contributing factors:
   - Concentration of naturally occurring affordable ownership and rental housing opportunities in the northeast areas of the City further concentrates poverty, cost burden, and overcrowding in areas vulnerable to displacement.
   - There is a relative lack of affordable housing opportunities in higher-resourced areas of the City. The majority of housing in the City of Millbrae is comprised of owner-occupied units with three or more bedrooms.
   - Concentration of land zoned to allow for higher density residential development adjacent to industrial uses and public facilities located around El Camino Real and Highway 101—in the census tracts east of Magnolia Avenue.
3. **Fair housing issue: Higher unemployment rate for persons with disabilities.**
   Contributing factors:
   - Limited job opportunities, access to employment, and market discrimination.
4. **Fair housing issue: Environmental hazards – air quality.**
   Contributing factors:
   - Millbrae's proximity to the San Francisco Airport results in air quality impacts resulting from diesel-fueled aircraft and GHG emissions.
5. **Fair housing issue: Inadequate Fair Housing resources and/or outreach capacity.**
   Contributing factors:

- **Lack of awareness of, or lack of, fair housing resources and support.**

6. **Fair housing issue: Lower educational outcomes for racial and ethnic minority students.**

   Contributing factors:

   - **A lower percentage of racial and ethnic minority students meet college admission standards.**

The Fair Housing Action Plan (FHAP) is provided in the table on the following page and details how the City of Millbrae proposes to respond to the factors contributing to the fair housing challenges identified in this analysis.

AFFH IDENTIFIED FAIR HOUSING ISSUES	CONTRIBUTING FACTORS	PRIORITY (HIGH, MEDIUM, LOW)	MEANINGFUL ACTIONS (PROGRAMS)
Lack of Housing Choice and Mobility (Affordable Housing)	Cost Burden/Lack of Access to Opportunity Due to Rising Housing Costs/Need for Affordable Housing Shortage of affordable rental and homeownership options in all areas of the City	High	• HIP-1. Triennial Advocacy Meeting with Affordable Housing Property Owners/Managers, Fair Housing Providers, Service Providers, Housing Advocates, and Non-Profits • HIP-3. Annual Meeting with San Mateo County Housing Authority and the San Mateo County Consortium to Identify Affordable Housing Opportunities • HIP-15. Continue to Implement the Millbrae Station Area Specific Plan • HIP-16. Downtown and El Camino Real Specific Plan Implementation • HIP-21. Services for Unhoused Persons • HIP-23. Prioritize Review and Expedite the Development of Affordable and Special Needs Projects • HIP-24. Encourage and Facilitate Lot Consolidation • HIP-31. Pursue State and Federal Funding for Affordable Housing • HIP-32. Local Funding for Affordable Housing • HIP-33. Allocate CDBG Funding for Housing • HIP-35. Assist with the Development of Lower-Income Housing • HIP-36. Funding, Incentives, and Concessions for Extremely Low-Income Developments • HIP-37. Advertise Available Resources • HIP-42. Implement Reduced Parking for Affordable Housing • HIP-52. Pilot City Mortgage Assistance Program • HIP-53. Additional Density Bonus Incentives

AFFH IDENTIFIED FAIR HOUSING ISSUES	CONTRIBUTING FACTORS	PRIORITY (HIGH, MEDIUM, LOW)	MEANINGFUL ACTIONS (PROGRAMS)
			• HIP-54. Allow Additional Affordable Housing in P-D Zones • HIP-55. Housing Mobility • HIP-56. Provide New Housing Choices in Lower-Density Neighborhoods Through Incentives for SB9 Units in R1-Zone Neighborhoods • HIP-57. By-Right Approval on Reuse Sites • HIP-58. Tools for Financing Infrastructure and Development
Displacement Risk	Area with households with reported poverty, cost burden & overcrowding in Northeast City vulnerable to displacement. Lack of affordable housing opportunities The concentration of higher density residential zoning area east of Magnolia Ave.	Medium	• HIP-1. Triennial Advocacy Meeting with Affordable Housing Property Owners/Managers, Fair Housing Providers, Service Providers, Housing Advocates, and Non-Profits • HIP-3. Annual Meeting with San Mateo County Housing Authority and the San Mateo County Consortium to Identify Affordable Housing Opportunities • HIP-21. Services for Unhoused Persons • HIP-28. Anti-Displacement Measures • HIP-31. Pursue State and Federal Funding for Affordable Housing • HIP-32. Local Funding for Affordable Housing • HIP-33. Allocate CDBG Funding for Housing • HIP-35. Assist with the Development of Lower-Income Housing • HIP-36. Funding, Incentives, and Concessions for Extremely Low-Income Developments • HIP-37. Advertise Available Resources • HIP-38. Legal Assistance for Renters and Support for Fair Housing Services Provider • HIP-42. Implement Reduced Parking for Affordable Housing
Environmental Hazards	Exposure to air pollutants in areas of the City (SFO)	Medium	• HIP-7. Residential Energy Conservation Program • HIP-8. Energy Conservation Grant Funding • HIP-9. Reduce Exposure to Environmental Pollution • HIP-10. Coordinate with the SFO Community Roundtable and C/CAG to Monitor Noise and Air Quality Outcomes
High unemployment	Limited job opportunities,	High	• HIP-1. Triennial Advocacy Meeting with Affordable Housing Property

AFFH IDENTIFIED FAIR HOUSING ISSUES	CONTRIBUTING FACTORS	PRIORITY (HIGH, MEDIUM, LOW)	MEANINGFUL ACTIONS (PROGRAMS)
rates and lack of access to services for persons with disabilities	access to employment, and market discrimination.		Owners/Managers, Fair Housing Providers, Service Providers, Housing Advocates, and Non-Profits • HIP-23. Prioritize Review and Expedite the Development of Affordable and Special Needs Projects • HIP-26. Coordination with Disability Rights Service Providers and Updates to Reasonable Accommodations for People with Disabilities • HIP-38. Legal Assistance for Renters and Support for Fair Housing Services Provider • HIP-39. Meet with Service Providers and Advertise Employment Resources for Persons with Disabilities • HIP-40. Collaboration with San Mateo County Vocational Rehabilitation Services • HIP-41. Implement the City's Economic Development Plan
A lack of Fair Housing resources/ outreach capacity	Lack of resources for fair housing agencies and organizations.	Medium	• HIP-1. Triennial Advocacy Meeting with Affordable Housing Property Owners/Managers, Fair Housing Providers, Service Providers, Housing Advocates, and Non-Profits • HIP-28. Anti-Displacement Measures • HIP-26. Coordination with Disability Rights Service Providers and Updates to Reasonable Accommodations for People with Disabilities • HIP-33. Allocate CDBG Funding for Housing
Lower educational outcomes for racial/ethnic minority students	A lower percentage of racial and ethnic minority students meet college admission standards	Medium	• HIP-5. Support Local School Districts for Better Educational Outcomes

Regional Fair Housing Issues

Additional fair housing issues were identified on a REGIONAL basis (are generally issues affecting the State as a whole) but were found to be less prevalent or no more prevalent than in surrounding cities. The following lists those issues that are not technically identified as "findings" that are specifically found in Millbrae, but proposed programs associated with the findings listed above will address and alleviate these disparities:

1. Racial and ethnic minority populations—particularly people who identify as Hispanic or Black—are disproportionately impacted by poverty, low household incomes, poor educational outcomes, cost burden, overcrowding, and homelessness compared to the non-Hispanic White population in the City of Millbrae. Additionally, racial and ethnic minorities are more likely to be denied a home mortgage loan. However, **these are larger issues that go beyond the borders of the City of Millbrae, but these issues in the City are less severe than in surrounding Cities including Burlingame, Hillsborough, San Bruno, San Mateo, and South San Francisco (Figures IV-16). Programs HIP-1, 3, 15-16, 21, 23-24, 31-33, 35-37, and 42 will facilitate and encourage affordable housing, and the sites identified in the Sites Inventory are in locations that provide for positive economic and educational outcomes, thereby addressing the region and State-wide factors affected racial and ethnic minority populations.**

2. **Racial and ethnic minority populations generally have higher rates of poverty (Figure II-6) and lower household incomes** (Figure II-5) compared to the non-Hispanic White population in the City of Millbrae. **See the statement under #1 above regarding how the proposed Programs will address these issues.**

3. **Racial and ethnic minorities are more likely** than non-Hispanic White households **to experience overcrowding** (Figure IV-21). Low- and moderate-income households are also more likely to be overcrowded (Figure IV-22). **See the statement under #1 above regarding how the proposed Programs will address these issues.**

4. **Hispanic, Black, and Pacific Islander high school students are more likely to drop out and less likely to meet college admission standards** (Attachment B - Disparate Access to Educational Opportunity). **See the statement under #1 above related to the location of Sites in the Sites Inventory being located in areas with positive economic and educational outcomes.**

5. **People who identify as American Indian or Alaskan Native, Black, White, and Hispanic are overrepresented in the homeless population** compared to their share of the general population (Figure IV-26). **See the statement under #1 above regarding how proposed Programs will address these issues by facilitating and encouraging affordable housing.** It is important to note that Millbrae represents approximately 3% of the population of San Mateo County, but according to the most recent point-in-time count (2022), only 1% of the homeless population of the County is located in the City.

6. Black and Hispanic households had the highest denial rates for mortgage loan applications in 2018 and 2019 (Figure IV-37). **The City of Millbrae shows better outcomes in most cases when compared to surrounding cities (Figure IV-38). In most cases, these problems are more regional than specific to Millbrae itself. See the statement under #1 above regarding how the proposed Programs will address these issues.**

Local Data and Knowledge

The City of Millbrae is located in northern San Mateo County, California on the Peninsula roughly 15 miles south of San Francisco. Incorporated in 1948, the City is best known for its scenic landscapes, well-cared-for neighborhoods, and network of mobility via rail and freeway access to San Francisco and the South Bay area along with foreign and domestic access via its proximity to the San Francisco International Airport. Millbrae is a built-out city, and vacant land is scarce. Millbrae's expansion is constrained by proximity to neighboring incorporated cities San Bruno (to the north), Burlingame (to the south), San Andreas Lake (to the west), and SFO (to the east).

The City is characterized as a suburban residential community, traditionally functioning as a bedroom community in which most residents who live in the City commute to work outside of the City. These types of communities came to be shortly after WWII and have seen a resurgence with the COVID-19 pandemic. Before the adoption of the City of Millbrae General Plan in 1998, the City's residential development patterns were heavily influenced by land development subdivision patterns dating back to the original subdivision Millbrae Villa, created back in 1889[5]. The City's 2040 General Plan update draft published in 2016 identifies 74% of the City is designated as residential, with the majority as low residential with a density cap of 8 units per acre.[6]

In its early days, the City's key industries were agriculture, floriculture, dairy, and porcelain manufacturing with growth attributed to the development of jobs within the City, as seen in the case of the addition of the West Coast Porcelain Works factory in the early 1920s, which saw families within the City increase from 16 to over 300. Today, the City's largest industries are Professional, Scientific & Technical Services, Health Care & Social Assistance, and Retail Trade, with Information, Utilities, and Manufacturing representing their highest-paying industries. Transportation has also helped shape Millbrae's growth, allowing for growth in residents who work outside of the City. There are 11,320 employed residents, and 6,657 jobs in Millbrae - the ratio of jobs to resident workers is 0.59. This makes the City a net exporter of workers. The impact of this can be seen when looking at the wage-to-earnings ratio of City residents. Millbrae has more low-wage jobs than low-wage residents (where low-wage refers to jobs paying less than $25,000). At the other end of the wage spectrum, the City has more high-wage residents than high-wage jobs (where high-wage refers to jobs paying more than $75,000).

As the City continues to grow, the importance of planning decisions remains prominent. Thoughtful planning and community-based policies have guided the controlled growth of the City with an emphasis on invigorating its commercial core, maintaining its unique neighborhood charm, and preserving the surrounding natural open spaces. The most common land use is single-family detached residential representing 59% of all land uses. General commercial makes up 4.7%, parks and open space makes up 7%, and only 0.2% of land is vacant. Some of the existing land uses were established before the adoption of the current General Plan land use

[5] http://www.millbraehs.org/millbrae-neighborhoods.html

[6] https://millbrae2040.com/wp-content/uploads/2015/12/MillGPU_PRD_BR_03_Land-Use-and-Community-Character.pdf

designation/zoning district. This is a critical factor when looking to identify if past general plan policies have helped or hindered new development in areas able to accommodate population growth and underutilized areas that may be able to accommodate new growth.

The City's desirable attributes coupled with growth experienced in the Bay Area stemming from the strong economy have resulted in Millbrae becoming a highly sought-after place to live, equating to significant increases in home sale prices and rents. This Affirmatively Furthering Fair Housing section of the Housing Element provides a detailed analysis of fair housing issues in the City.

As shown in the analysis, the data indicates that the primary fair housing issue in Millbrae is a lack of housing choices due to a lack of affordable housing units. To address this issue, the City has taken very proactive steps to facilitate and encourage affordable housing via the following programs:

- **Millbrae Station Area Specific Plan (MSASP):** The City adopted the MSASP in 1998, and updated it in 2016, to produce developments connected to transit. The MSASP zones for the development of 1,750 units. Beyond adoption, the City continues to implement and amend the MSASP to allow more flexibility for land uses in the MSASP area.
    - The City approved the Gateway at Millbrae Station project, located at the Millbrae BART Station. The project will encourage Transit Oriented Development and bring 400 new rental homes to the City, including 100 affordable units. 79 of the affordable units will be veteran-preferred.
    - The City also approved the Millbrae Serra Station Transit Oriented Development project, which includes up to 488 rental units, of which 15% (up to 73 units) are affordable for Low and Moderate-Income households.
- **Accessory Dwelling Unit (ADU) Ordinance:** The City incorporated new housing laws, and community feedback objective design standards into its ADU ordinance to facilitate the approval of ADUs in the City.
- **General Plan Update and Downtown and El Camino Real Specific Plan (Specific Plan):** The City initiated the process of updating the Millbrae General Plan and adopting its Specific Plan. Both the General Plan and Specific Plan were adopted in late 2022 to provide developers with the tools to build more housing in the City.
- **Affordable Housing On-Site and In-Lieu Fee Requirements:** The City amended the Millbrae Municipal Code in July 2021 to add affordable housing on-site and in-lieu fee requirements. The amendment established requirements for the provision of inclusionary affordable housing at the rate of 15% on-site, affordable units for projects with more than 10 units.

    - The inclusionary requirements secured 100 deed-restricted very low-, low-, and moderate-income units at the Gateway Millbrae Station, of which 79 are for veteran preference.

- **Notice of Intent and Offer to Convey Surplus Property:** The City provided such notices to eligible agencies and affordable housing organizations in 2021, under the Surplus Land Act.

    - The City received four Notices of Interest from affordable housing organizations and conducted good-faith negotiations with them.

- **Density Bonus Ordinance:** The City adopted a local ordinance consistent with State law, offering a greater density bonus than allowed by the default State standards.

SECTION I. Fair Housing Enforcement and Outreach Capacity

This section discusses fair housing legal cases and inquiries, fair housing protections and enforcement, and outreach capacity.

Fair housing legal cases and inquiries

California fair housing law extends beyond the protections in the Federal Fair Housing Act (FHA). In addition to the FHA-protected classes—race, color, ancestry/national origin, religion, disability, sex, and familial status—**California law offers protections for age, sexual orientation, gender identity or expression, genetic information, marital status, military or veteran status, and source of income** (including federal housing assistance vouchers).

The California Department of Fair Employment in Housing (DFEH) was established in 1980 and is now the **largest civil rights agency in the United States**. According to their website, the DFEH's mission is, "to protect the people of California from unlawful discrimination in employment, housing, and public accommodations (businesses), and hate violence and human trafficking in accordance with the Fair Employment and Housing Act (FEHA), Unruh Civil Rights Act, Disabled Persons Act, and Ralph Civil Rights Act."[7]

DFEH receives, evaluates, and investigates fair housing complaints. DFEH plays a particularly significant role in investigating fair housing complaints against protected classes that are not included in federal legislation and therefore not investigated by HUD. DFEH's website provides detailed instructions for filing a complaint, the complaint process, appealing a decision, and other frequently asked questions.[8] Fair housing complaints can also be submitted to HUD for investigation.

Additionally, San Mateo County has several **local enforcement organizations** including Project Sentinel, the Legal Aid Society of San Mateo County, and Community Legal Services of East Palo Alto. These organizations receive funding from the County and participating jurisdictions to support fair housing enforcement and outreach and education in the County (Figure I-1).

[7] https://www.dfeh.ca.gov/aboutdfeh/

[8] https://www.dfeh.ca.gov/complaintprocess/

Figure I-1. Fair Housing Assistance Organizations, San Mateo County

Name	Service Area	Address	Phone	Website
Project Sentinel	Northern California	1490 El Camino Real, Santa Clara, CA 95050	(800) 339-6043	https://www.housing.org/
Legal Aid Society of San Mateo County	San Mateo County	330 Twin Dolphin Drive, Suite 123, Redwood City, CA 94065	(650) 558-0915	https://www.legalaidsmc.org/housing-resources
Community Legal Services of East Palo Alto	East Palo Alto, Menlo Park, Burlingame, Mountain View, Redwood City, and San Francisco	1861 Bay Road, East Palo Alto, CA 94303	(650)-326-6440	https://clsepa.org/services/#housing

Source: Organization Websites

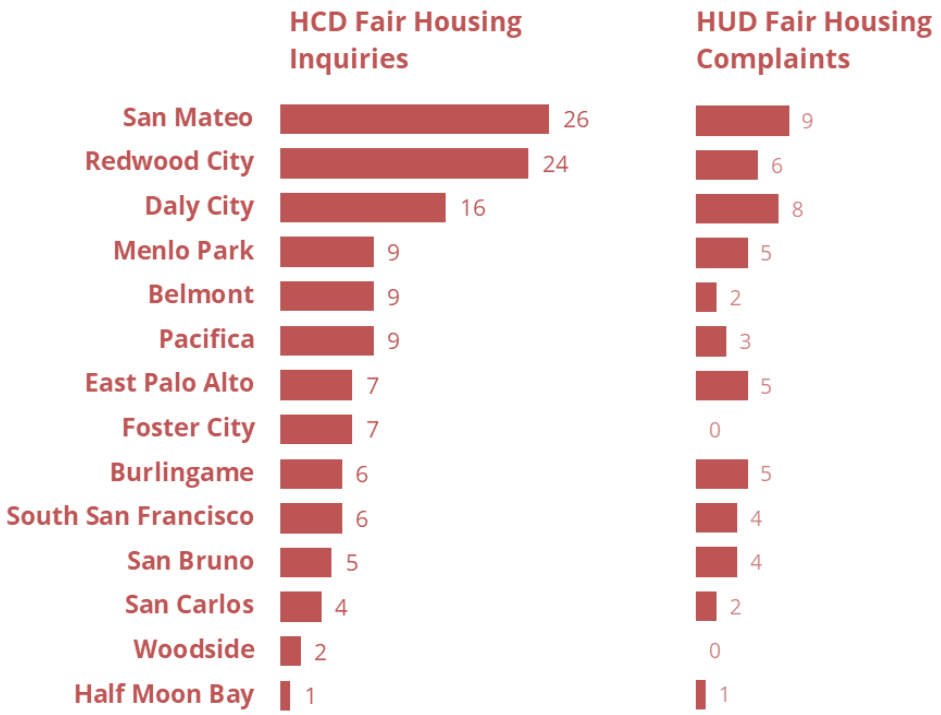
From 2017 to 2021, 57 fair housing complaints in San Mateo County were filed with the U.S. Department of Housing and Urban Development (HUD) (Figure I-2)**—5% of complaints were in the City of Millbrae (3 complaints)**. Countywide, most complaints submitted to HUD cited disability status as the bias (56%) followed by race (19%), and familial status (14%). In the City of Millbrae, the most common issues cited were refusal to rent and discriminatory acts under Section 818 (e.g., coercion). Countywide, no cause determination was found in 27 complaints followed by successful conciliation or settlement with 22 complaints. Fair housing inquiries in 2020 were primarily submitted from the City of San Mateo, Redwood City, Daly City, and Menlo Park (Figure I-3, I-4, and I-5). **No fair housing lawsuits or inquiries were submitted in Millbrae.**

Figure I-2. Fair Housing Complaints Filed with HUD by Basis, San Mateo County, 2017-2021

Source: HUD

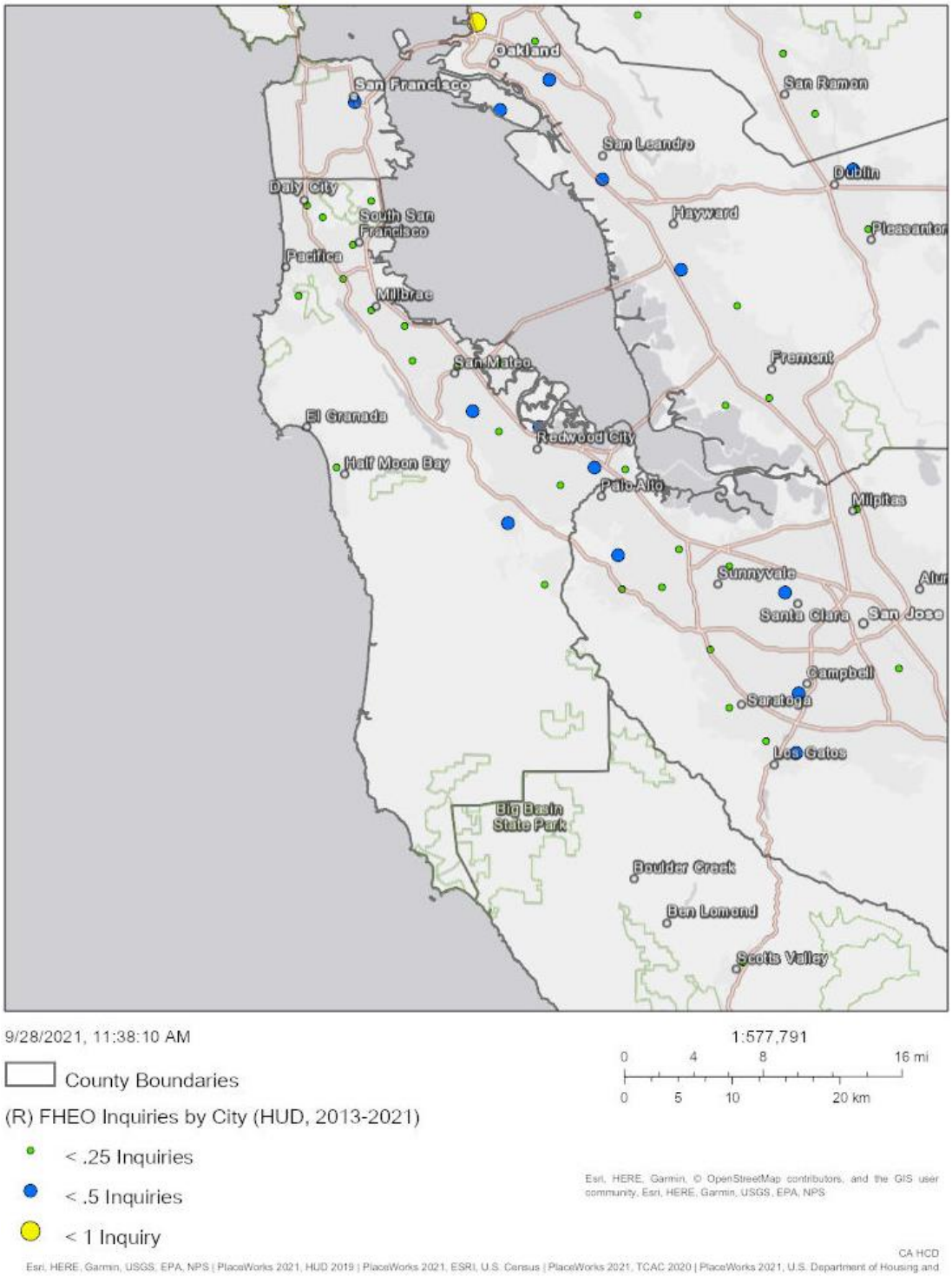
	2017	2018	2019	2020	2021	2017-2021 Total	
						Cases	% of Total
Disability	8	9	3	9	3	32	56%
Race	3	5	2	1		11	19%
Familial Status	4	3			1	8	14%
National Origin	2				1	3	5%
Religion		1		1		2	4%
Sex					1	1	2%
Total cases	17	18	5	11	6	57	100%

Figure I-3. HCD Fair Housing Inquiries (2013-2021) and HUD Fair Housing Complaints (2017-2021)



Source: Organization Websites

Figure I-4. HEO Inquiries by City to HUD, San Mateo County, 2013-2021



Source: California Department of Housing and Community Development AFFH Data Viewer

Figure I-5. Fair Housing Inquiries by Bias, January 2013-March 2021

Jurisdiction	Disability	Race	Familial Status	National Origin	Religion	Sex	Color	Total
Atherton	0	0	0	0	0	0	0	0
Belmont	2	0	1	0	0	0	0	9
Brisbane	0	0	0	0	0	0	0	0
Burlingame	3	0	2	0	0	0	0	6
Colma	0	0	0	0	0	0	0	0
Daly City	1	2	1	3	0	0	0	17
East Palo Alto	1	1	0	0	0	0	0	7
Foster City	4	0	0	0	0	0	0	7
Half Moon Bay	0	0	0	0	0	0	0	1
Hillsborough	0	0	0	0	0	0	0	0
Menlo Park	3	0	0	0	0	1	0	11
Millbrae	0	0	0	0	0	0	0	0
Pacifica	3	0	0	1	0	1	0	9
Portola Valley	0	0	0	0	0	0	0	0
Redwood City	5	1	1	1	0	1	0	24
San Bruno	0	0	0	0	0	0	0	5
San Carlos	1	0	1	0	0	0	0	4
San Mateo	4	2	2	2	0	0	0	27
South San Francisco	0	0	0	1	0	0	0	6
Woodside	0	0	0	0	0	0	0	2

Source: California Department of Housing and Community Development AFFH Data Viewer

Of the 55 City of Millbrae respondents to the resident survey, 34 residents have looked for housing seriously, of those, 13 (39%) indicated that "*the unit was [...] no longer available*, and 12 (36%) indicated they have been denied housing to rent or buy in the past 5 years. The main reason for denial (67%) was "*income too low.*"

Similarly, of the 10 voucher holders responding to the survey, half indicated that finding an affordable unit is somewhat or very difficult.

Fair housing complaints filed with HUD by San Mateo County residents have been on a declining trend since 18 complaints were filed in 2018. Between 2019 and 2021, complaints fluctuated from 5 in 2019, to 11 in 2020, and back down to 6 by mid-2021.

Nationally, the National Fair Housing Alliance (NFHA) reported a "negligible" decrease in the number of complaints filed between 2019 and 2020. The primary bases for complaints nationally were nearly identical to San Mateo County's: disability (55%) and race (17%). Familial status represented 8% of complaints nationally, whereas this basis comprised 14% of cases in the County.

NFHA identifies three significant trends in 2020 that are relevant for San Mateo County:

- First, fair lending cases referred to the Department of Justice from federal banking regulators have been declining, indicating that State and local government entities may want to play a larger role in examining fair lending barriers to homeownership.
- Second, NFHA identified a significant increase in the number of complaints of harassment in San Mateo County —1,071 complaints in 2020 compared to 761 in 2019.
- Finally, NFHA found that 73% of all fair housing complaints in 2020 were processed by private fair housing organizations, rather than State, local, and federal government agencies—reinforcing the need for local, active fair housing organizations and increased funding for such organizations.[9]

Outreach and capacity

The City of Millbrae hosts affordable housing resources on its website, including links to local fair housing organizations including Project Sentinel, Legal Aid Society of San Mateo County, and Community Legal Services of East Palo Alto.[10] This could be improved by providing information about the Fair Housing Act, defining what qualifies as discrimination, and instructions for reporting discrimination. Program HIP-38 will provide a dedicated webpage on the City's website for fair housing information and education, including information on the Fair Housing Act.

Compliance with State law

The City of Millbrae is compliant with the following State laws that promote fair and affordable housing. The City has not been alleged or found in violation of the following:

- State 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);
- Housing Accountability Act (Gov Code Section 65589.5) requiring the adoption of a Housing Element and compliance with RHNA allocations;
- No Net Loss Law (Gov Code Section 65863) requiring that adequate sites be maintained to accommodate unmet RHNA allocations, including among income levels;

[9] https://nationalfairhousing.org/2021/07/29/annual-fair-housing-report-shows-increase-in-housing-harassment/

[10] https://www.ci.millbrae.ca.us/departments-services/community-development/redevelopment/affordable-housing

- Least Cost Zoning Law (Gov Code Section 65913.1);
- Excessive Subdivision Standards Law (Gov Code Section 65913.2);
- Limits on Growth Controls Law (Gov Code Section 65589.5).

Housing-specific policies enacted locally

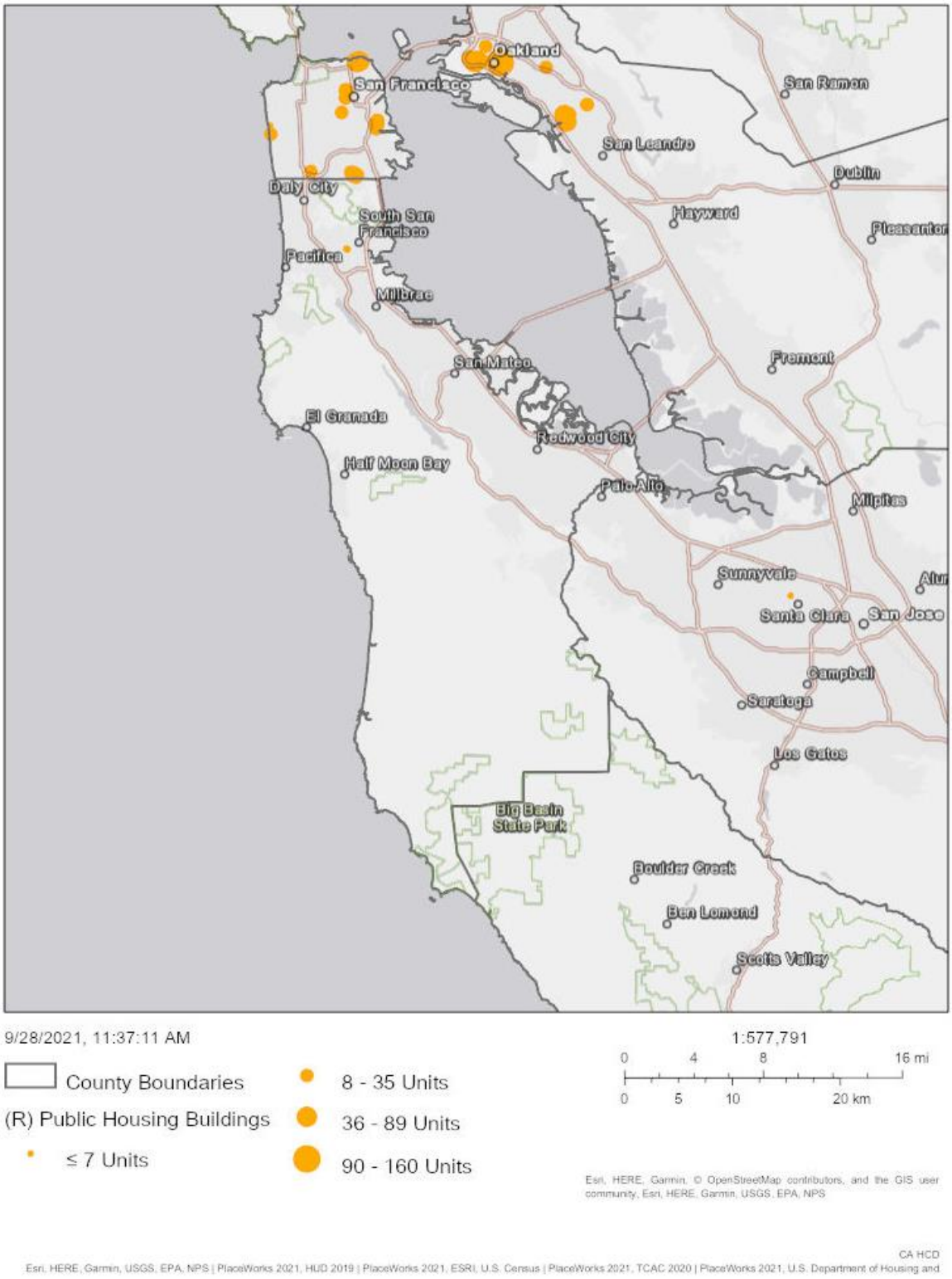
The City of Millbrae identified the following local policies that contribute to the regulatory environment for affordable housing development in the City.

Local policies in place to encourage housing development.	***Local barriers to affordable housing development.***
Form-based codes	Lack of market availability of property
Commercial Development Impact Fee	Lack of redevelopment opportunities for housing
Second Unit Ordinance	

Local policies that are NOT in place but have potential Council interest for further exploration.	***Local policies in place to mitigate or prevent displacement of low-income households.***
Acquisition of affordable units with expiring subsidies	Affordable housing impact/linkage fee on new residential development
	Affordable housing impact/linkage fee on new commercial development
	Inclusionary zoning
	Promoting streamlined processing of ADUs

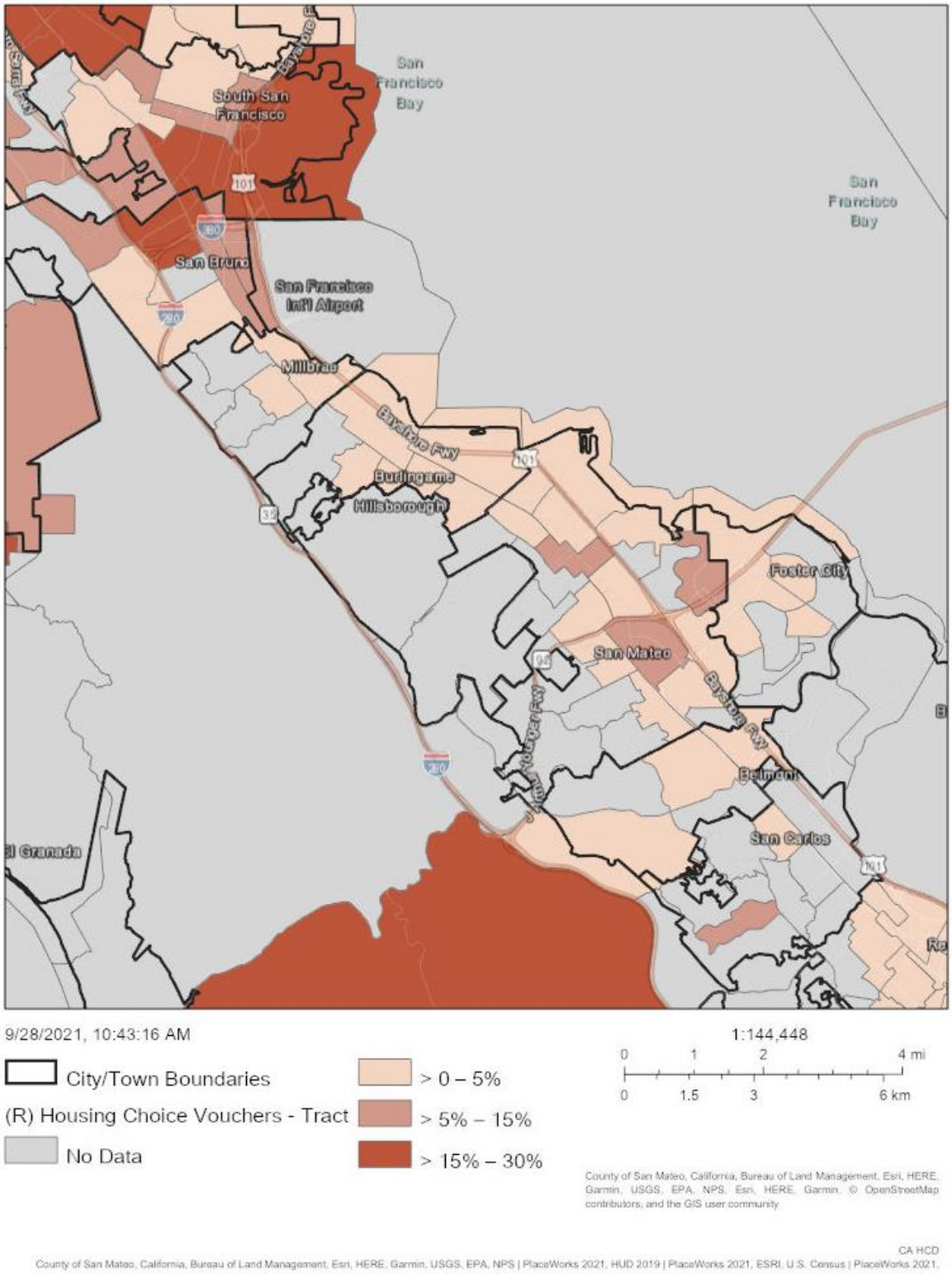
According to the California Department of Housing and Community Development AFFH Data Viewer (HCD data viewer), the City of Millbrae does not have any public housing buildings (Figure I-6). Additionally, census tracts in Millbrae all have less than 5% of renters using a housing voucher and five of the eight tracts have no data. Compared to nearby San Mateo, San Bruno, and Burlingame, the City **of Millbrae appears to have few opportunities for renters with housing vouchers** (Figure I-7).

Figure I-6. Public Housing Buildings, San Mateo County



Source: California Department of Housing and Community Development AFFH Data Viewer

Figure I-7. Housing Choice Vouchers by Census Tract



Source: California Department of Housing and Community Development AFFH Data Viewer

SECTION II. Integration and Segregation

This section discusses integration and segregation of the population by protected classes including race and ethnicity, disability status, familial status, and income status. The section concludes with an analysis of racially and ethnically concentrated areas of poverty and affluence.

Integration and Segregation

"Integration generally means a condition in which there is not a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability when compared to a broader geographic area."

"Segregation generally means a condition in which there is a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a type of disability in a particular geographic area when compared to a broader geographic area."

Source: California Department of Housing and Community Development Guidance, 2021, page 31.

Figure II-1 summarizes segregation and integration in the City of Millbrae compared to the County.

Race and ethnicity

Nearly half (49%) of the population in the City of Millbrae is estimated to be Asian in 2019, compared to 30% of the population in San Mateo County. Millbrae has a smaller proportion of Hispanic (11% compared to 24% of the County population), Black (1%, 2%), and non-Hispanic White (34%, 39%) residents compared to the County. Children in the City of Millbrae have the most racial and ethnic diversity with 50% Asian, 30% White, and 18% identified as some other race or more than one race (Figure II-2).

Figure II-1. Segregation and Integration, Population by Protected Class

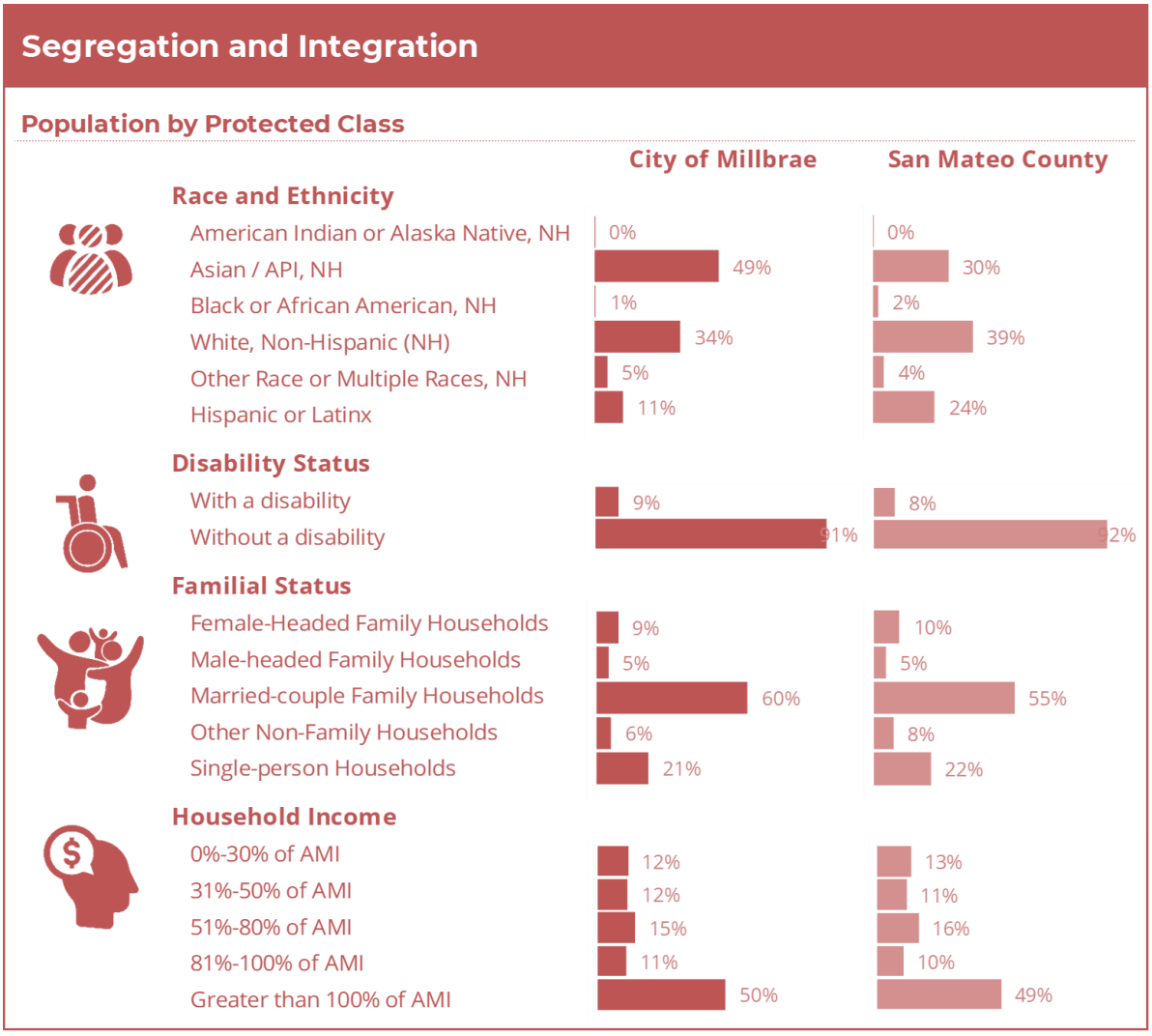
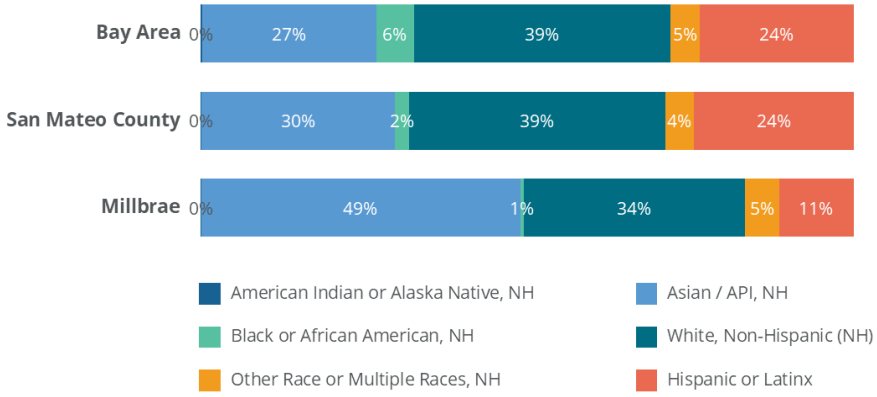


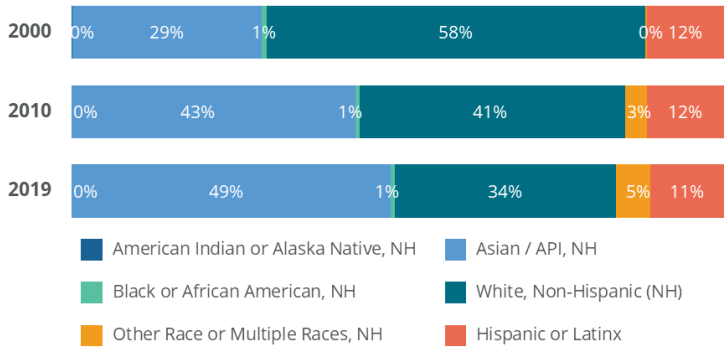
Figure II-2. Population by Race and Ethnicity, 2019



Source: ABAG Housing Needs Data Workbook

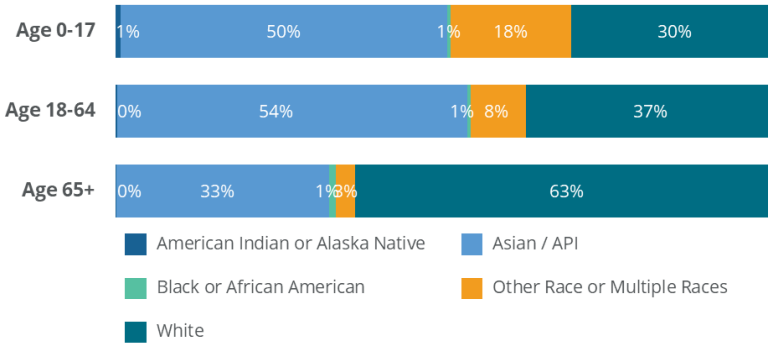
From 2000 to 2019, a large proportion of the **non-Hispanic White residents in the City were replaced by Asian residents** (Figure II-3). In 2000, 29% of the population in Millbrae was Asian compared to 58% non-Hispanic White, and in 2019, 49% identify as Asian while 34% identify as non-Hispanic White. **Older residents are less diverse** (Figure II-4).

Figure II-3. Population by Race and Ethnicity, City of Millbrae, 2000-2019



Source: ABAG Housing Needs Data Workbook

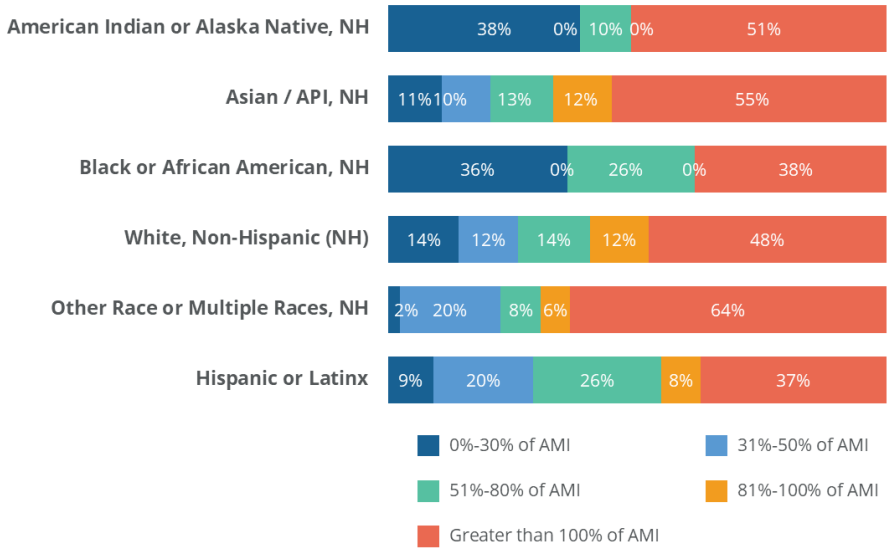
Figure II-4. Senior and Youth Population by Race, City of Millbrae, 2000-2019



Source: ABAG Housing Needs Data Workbook

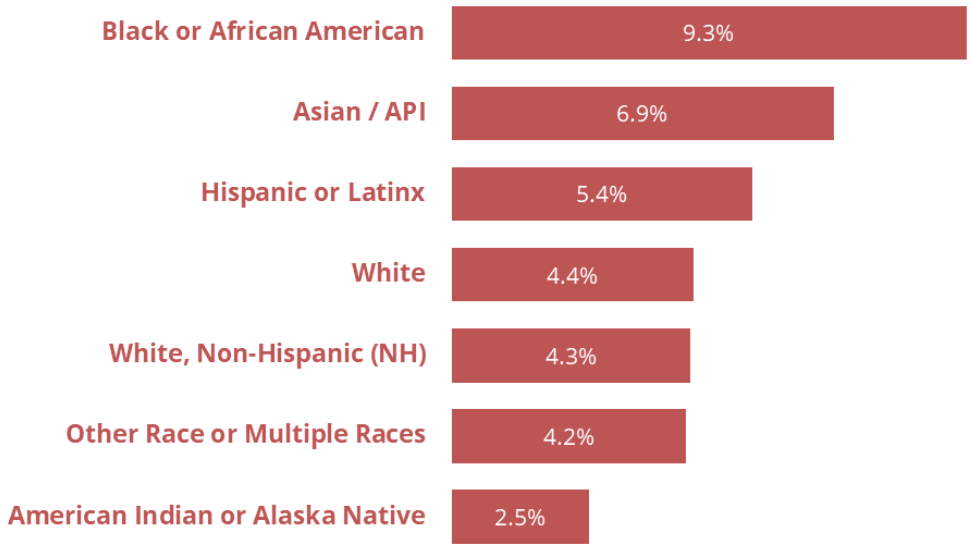
Hispanic and Black households in the City of Millbrae have disproportionately low incomes and experience higher rates of poverty (Figure II-5 and Figure II-6).

Figure II-5. Area Median Income by Race and Ethnicity, City of Millbrae, 2019



Source: ABAG Housing Needs Data Workbook

Figure II-6. Poverty Rate by Race and Ethnicity, City of Millbrae, 2019



Source: ABAG Housing Needs Data Workbook

Geospatially, the City of Millbrae has one slim and one sizeable White majority census tract and the remainder of the tracts in the City are Asian majority. **Millbrae scores high on the diversity index—which measures racial and ethnic diversity by census block group**—due to its large Asian population (Figures II-7, II-8, II-9, II-10, II-11, II-12, and II-13).[11]

The Dissimilarity Index (DI) is a common tool that measures segregation in a community. The DI is an index that measures the degree to which two distinct groups are evenly distributed across a geographic area. The DI represents the percentage of a group's population that would have to move for each area in the county to have the same percentage of that group as the County overall.

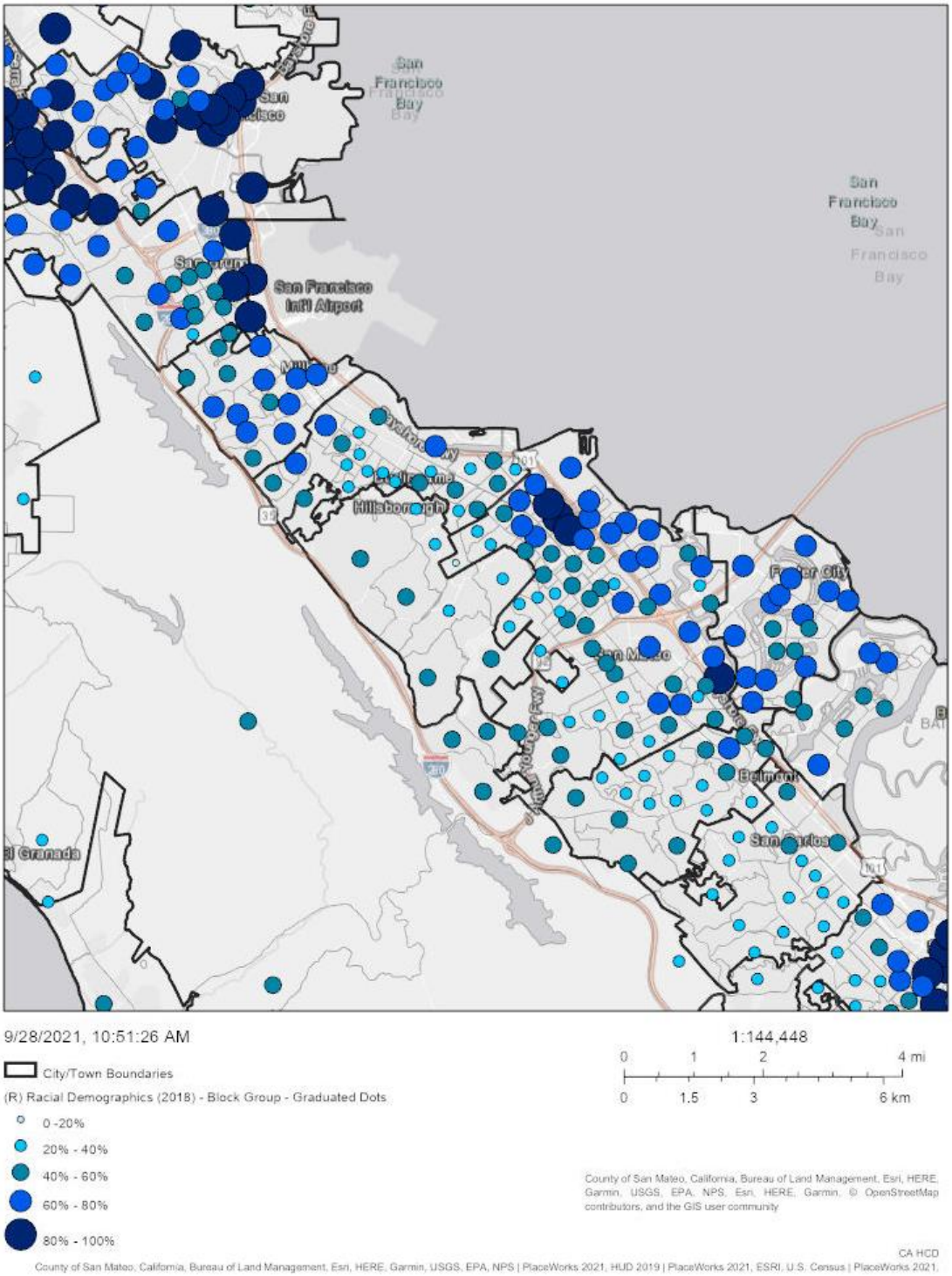
DI values range from 0 to 100—where 0 is perfect integration and 100 is complete segregation. Dissimilarity index values between 0 and 39 generally indicate low segregation, values between 40 and 54 generally indicate moderate segregation, and values between 55 and 100 generally indicate a high level of segregation.

The isolation index is interpreted as the probability that a randomly drawn minority resident shares an area with a member of the same minority, it ranges from 0 to 100 and higher values of isolation tend to indicate higher levels of segregation.

[11] Redlining maps, otherwise known as Homeowners' Loan Corporation (HOLC) maps, are not available for San Mateo County.

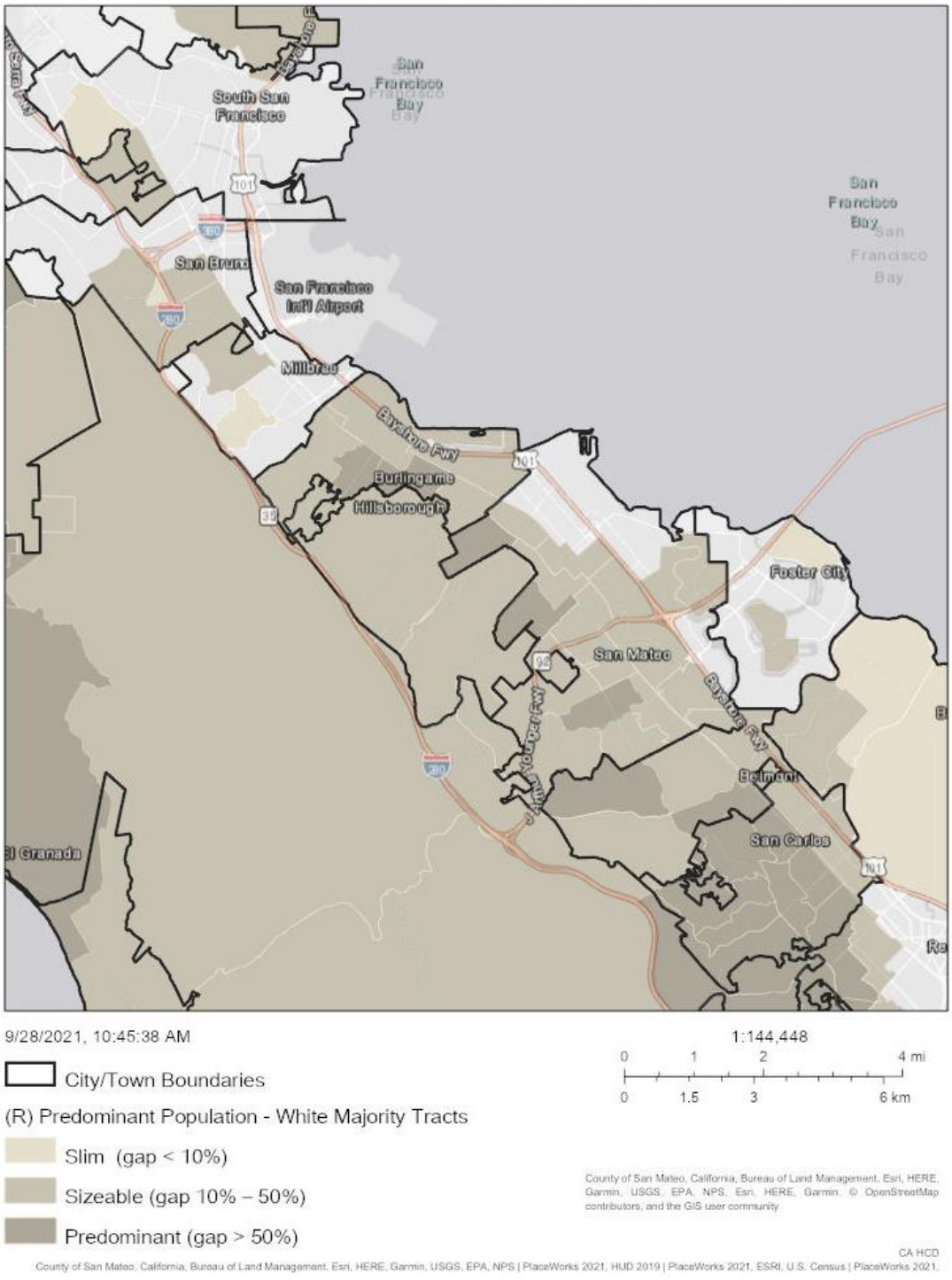
Per the St. Louis Federal Reserve Economic Data source, San Mateo County has a Dissimilarity score of 41.57. This is on the lower end of the values indicating moderate segregation. However, diversity and segregation will be strongly considered when creating programs for the Millbrae Housing Element.

Figure II-7. Percent of Non-White Population by Census Block Groups, 2018



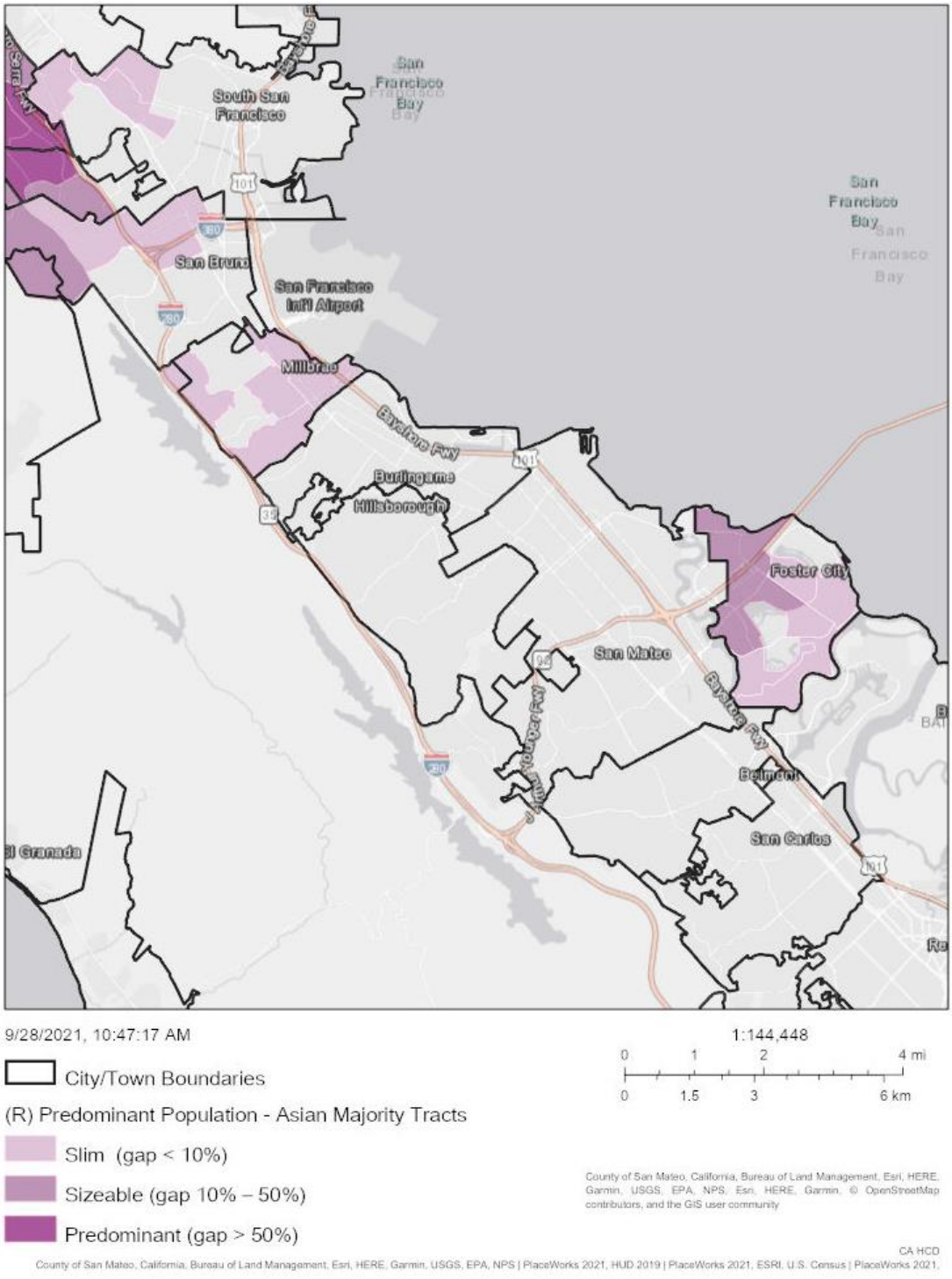
Source: California Department of Housing and Community

Figure II-8. Development AFFH Data Viewer: White Majority Census Tracts



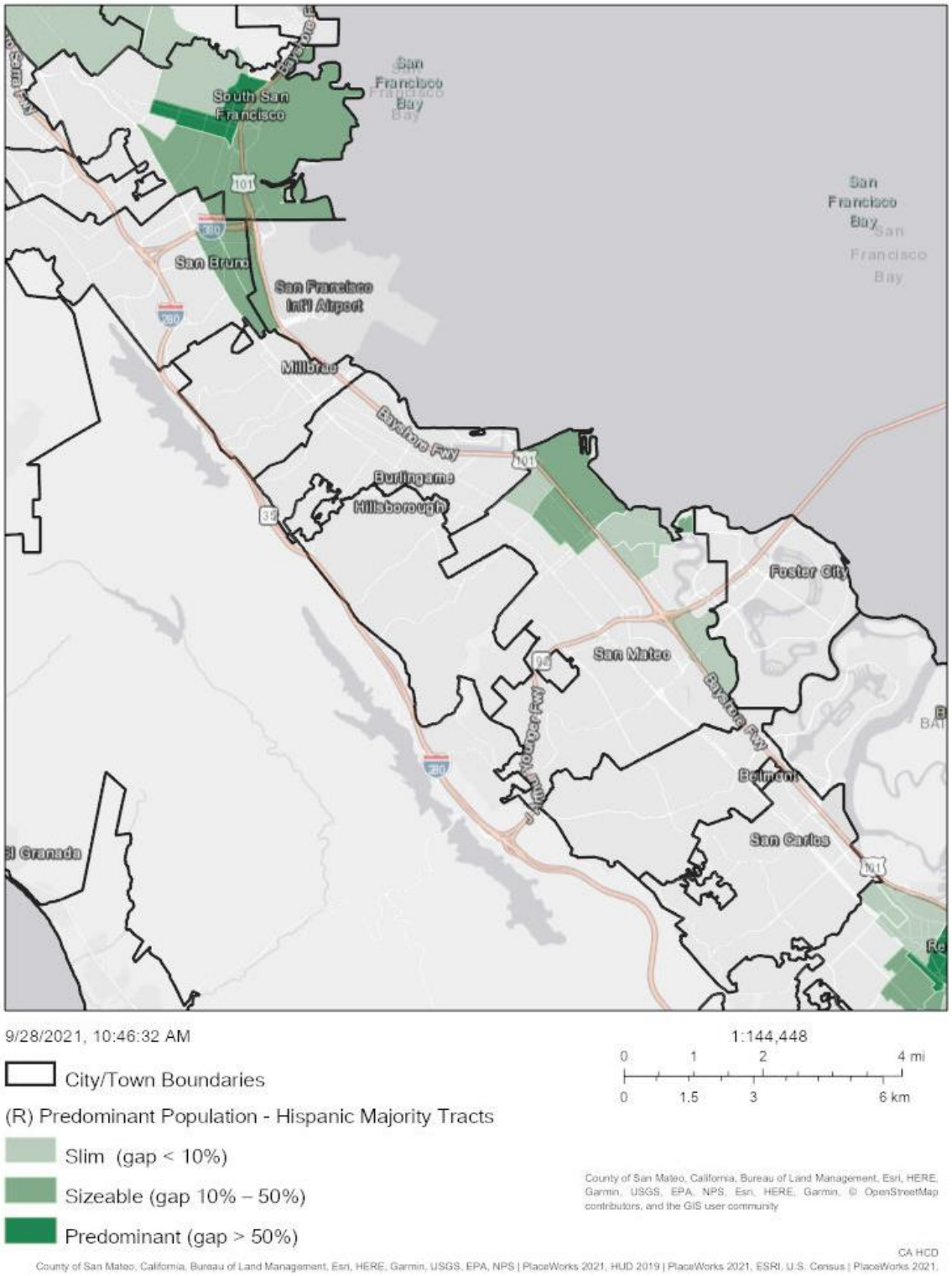
Source: California Department of Housing and Community Development AFFH Data Viewer

Figure II-9. Asian Majority Census Tracts



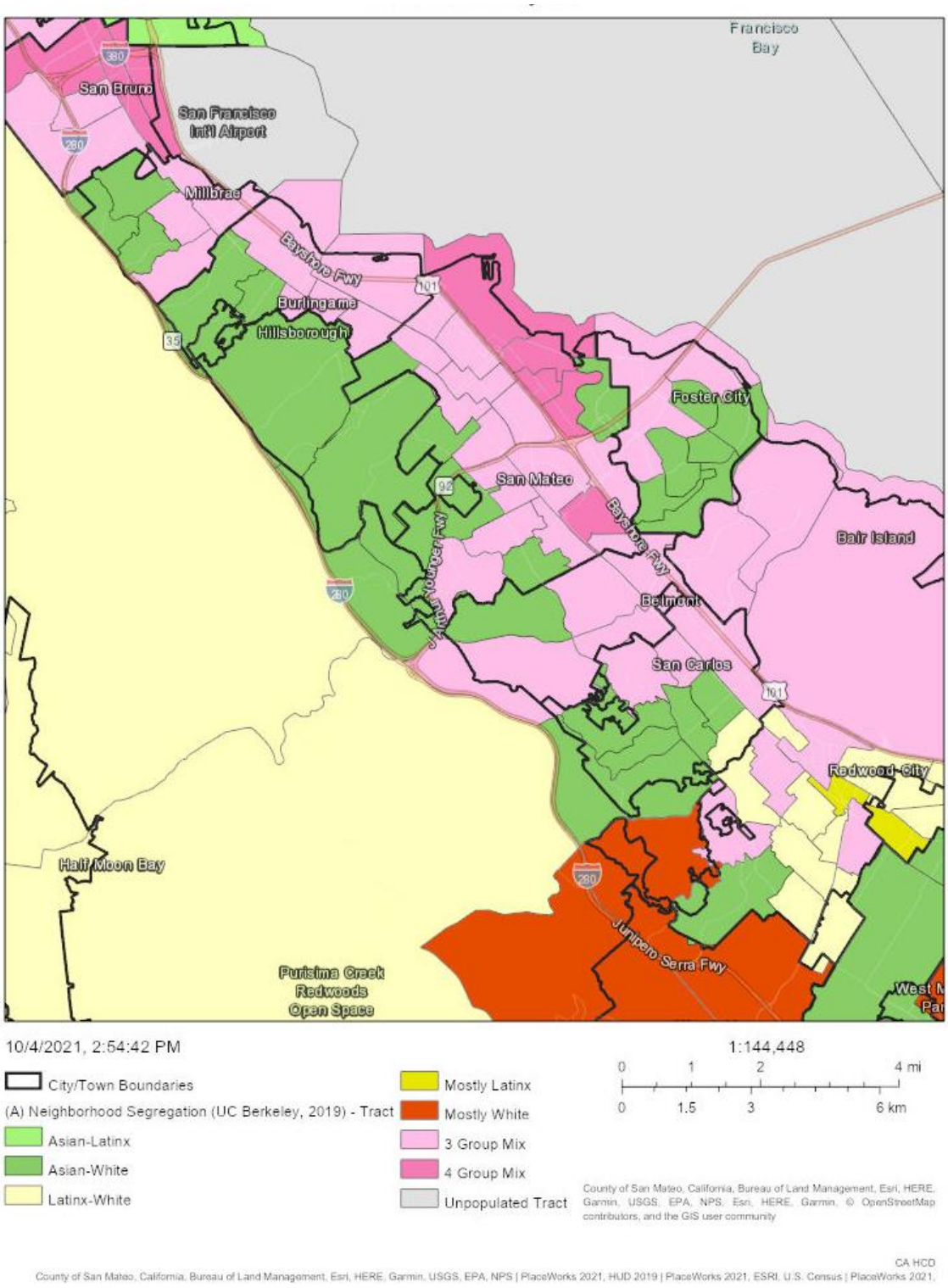
Source: California Department of Housing and Community Development AFFH Data Viewer

Figure II-10. Hispanic/Latinx Majority Census Tracts



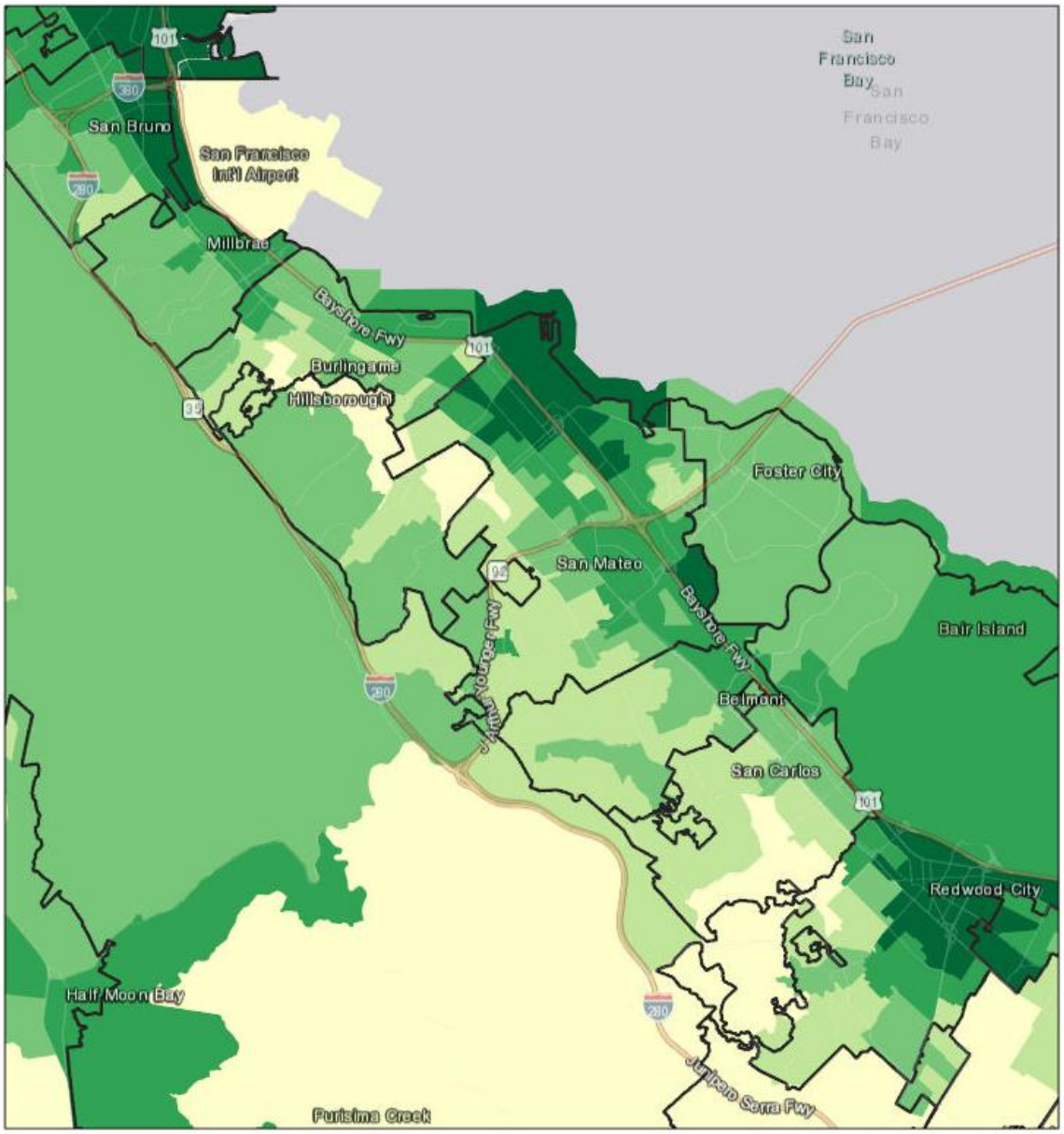
Source: California Department of Housing and Community Development AFFH Data Viewer

Figure II-11. Neighborhood Segregation by Census Tract, 2019



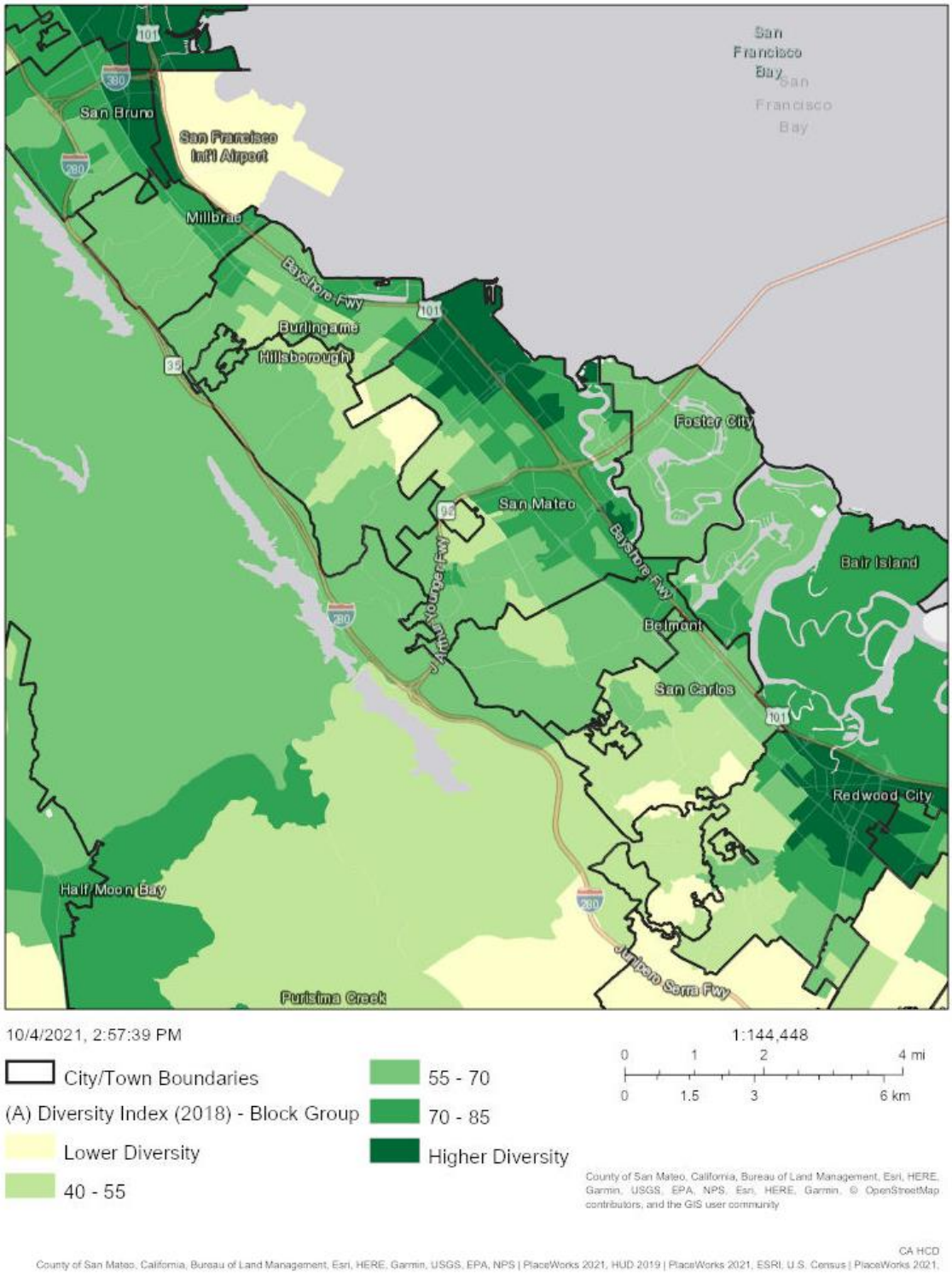
Source: California Department of Housing and Community Development AFFH Data Viewer

Figure II-12 Diversity Index by Block Group, 2010



Source: California Department of Housing and Community Development AFFH Data Viewer

Figure II-13. Diversity Index by Block Group, 2018

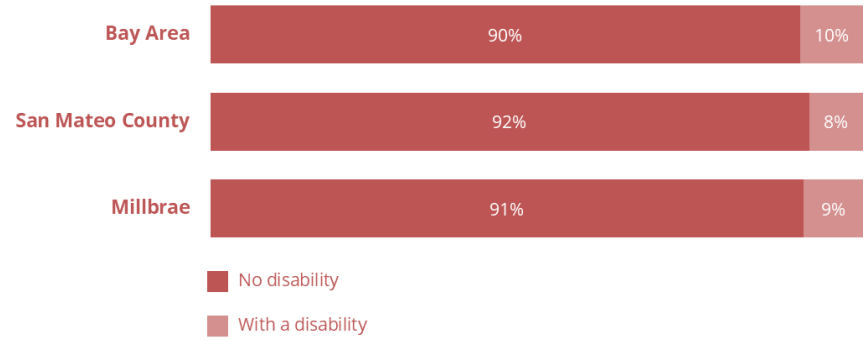


Source: California Department of Housing and Community Development AFFH Data Viewer Dissimilarity and isolation indices.

Disability status

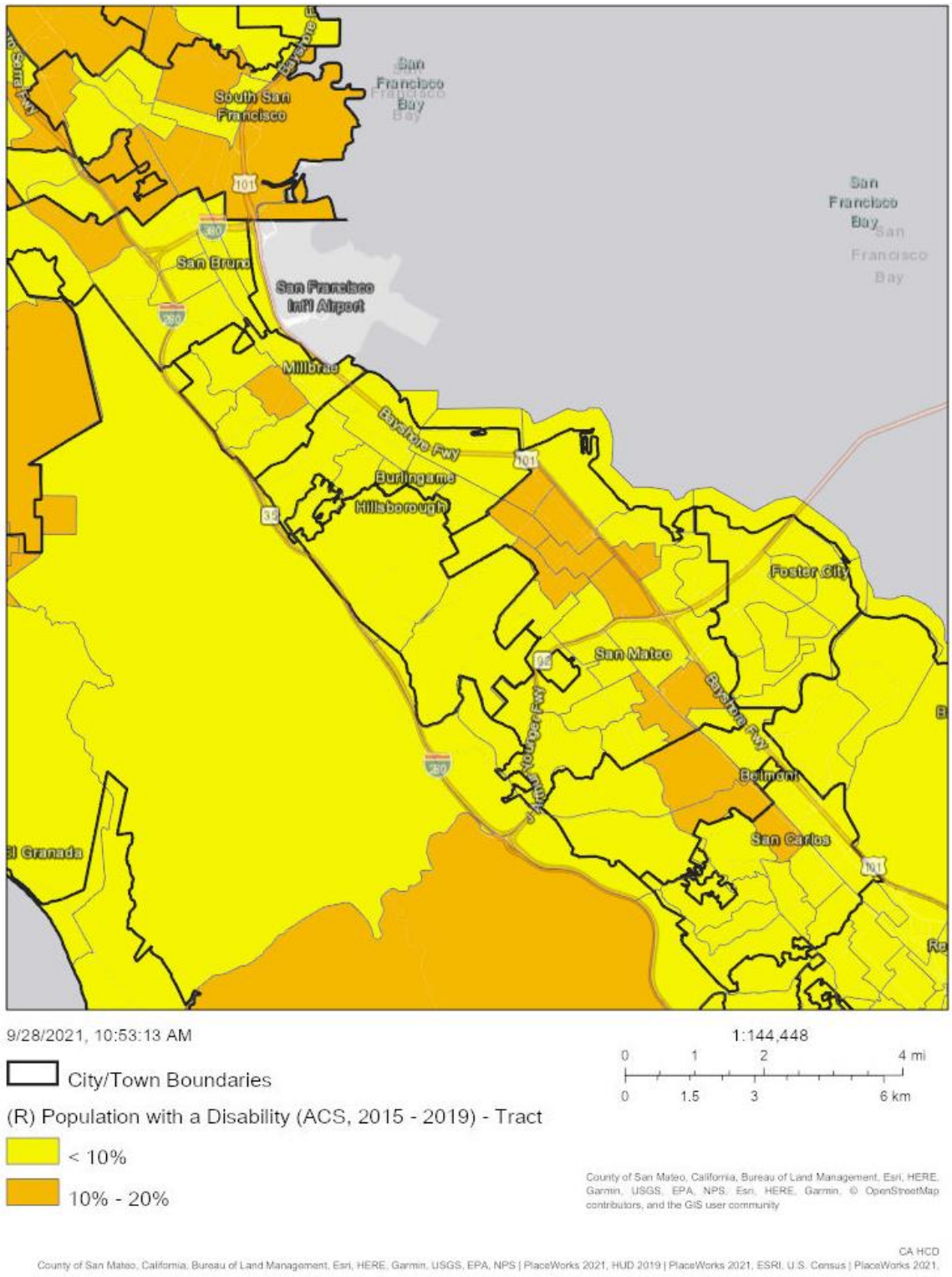
The **share of the population living with at least one disability is 9% in the City of Millbrae** compared to 8% in San Mateo County (Figure II-14). Additionally, there is one census tract in Millbrae with a share of the population living with a disability between 10% and 20% (Figure II-15, II-16). This census tract is centrally located and contains municipal services such as the Millbrae Library, Millbrae Community Center, bus stops along El Camino Real, and neighborhood businesses.

Figure II-14. Share of Population by Disability Status, 2019



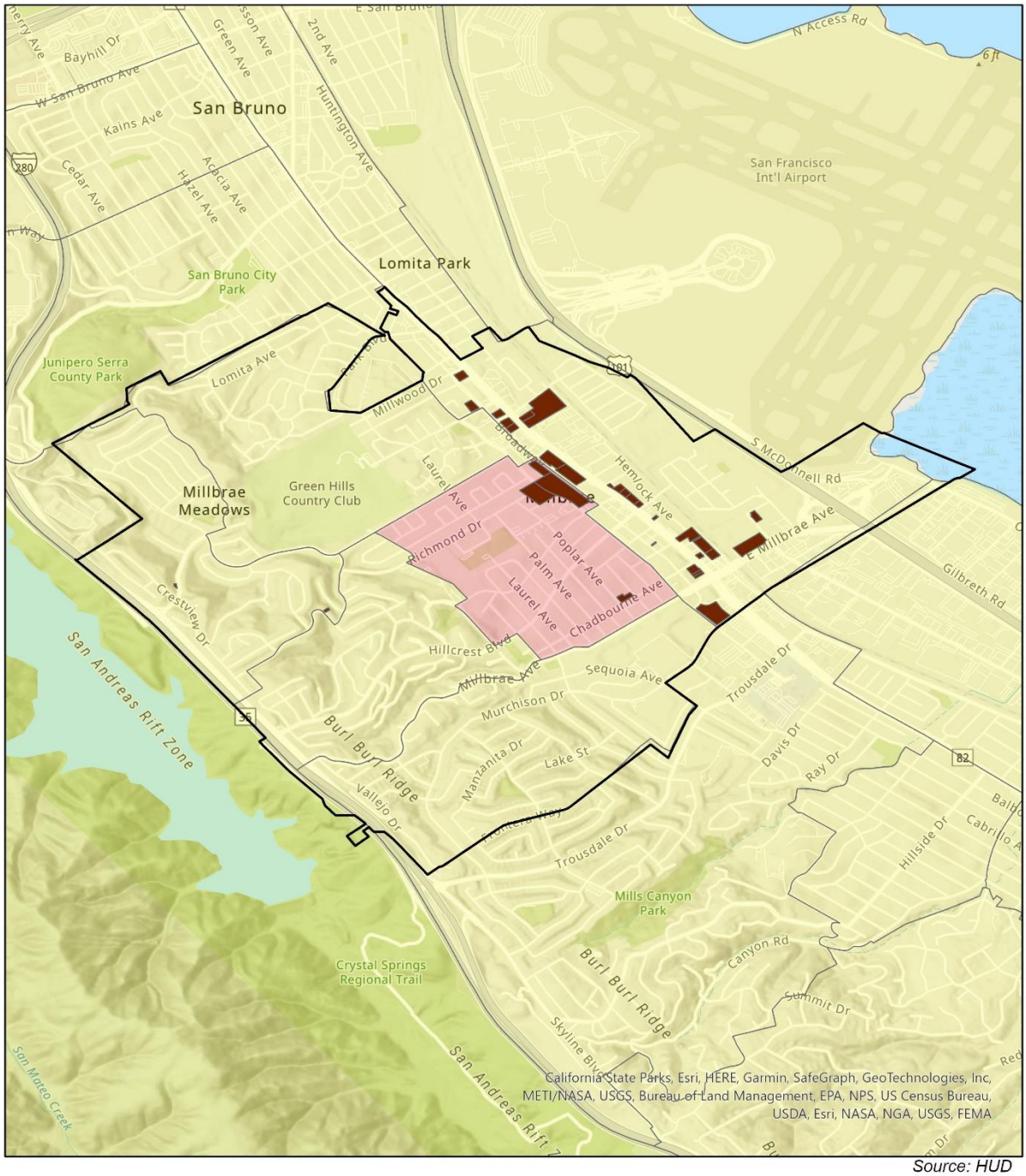
Source: ABAG Housing Needs Data Workbook

Figure II-15. Percent of Population with a Disability by Census Tract, 2019



Source: California Department of Housing and Community Development AFFH Data Viewer

Figure II-16. Sites Inventory and Percent of Population with a Disability by Census Tract, 2019



Source: HUD

Harris & Associates

N

0 0.5 1 Miles

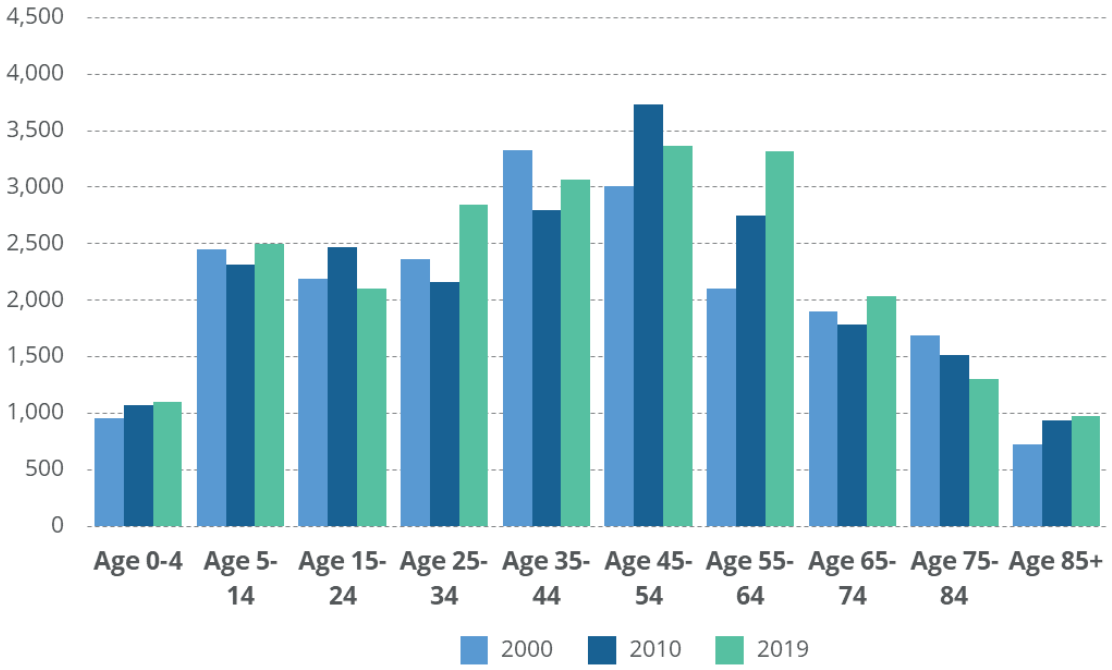
Sites Inventory and Disability

City of Millbrae Affirmatively Furthering Fair Housing

Familial Status

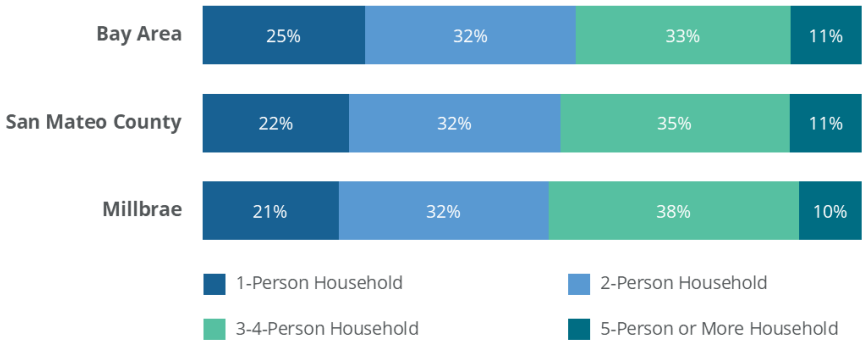
The age distribution in Millbrae over time can be seen in Figure II-17. Household sizes in the City are very similar to San Mateo County with 21% single-person households, 32% two-person households, 38% four-person person households, and 10% of households with more than five people (Figure II-18). Compared to the County, a **larger share of households in Millbrae is married-couple families**, estimated at 60% of households (Figure II-19 and Figure II-20).

Figure II-17. Age Distribution, City of Millbrae, 2000-2019



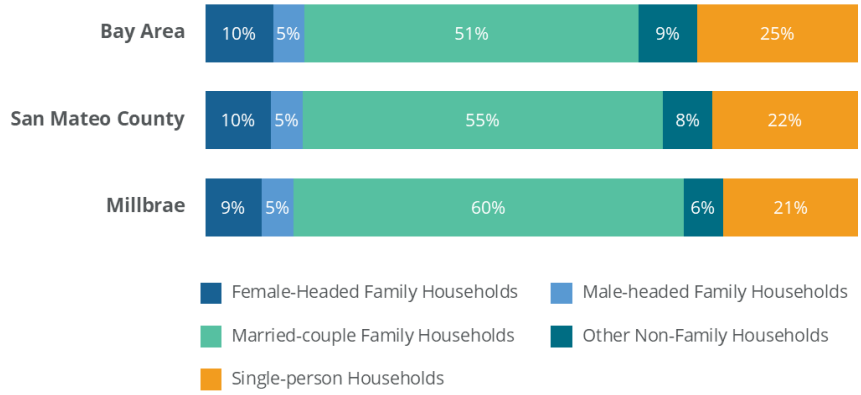
Source: ABAG Housing Needs Data Workbook

Figure II-18. Share of Households by Size, 2019



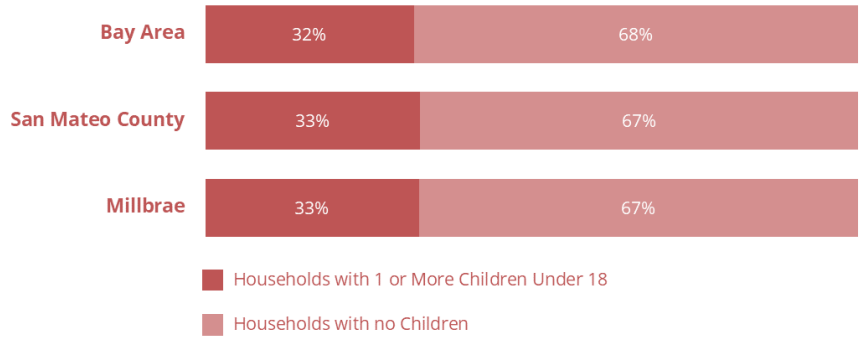
Source: ABAG Housing Needs Data Workbook

Figure II-19. Share of Households by Type, 2019



Source: ABAG Housing Needs Data Workbook

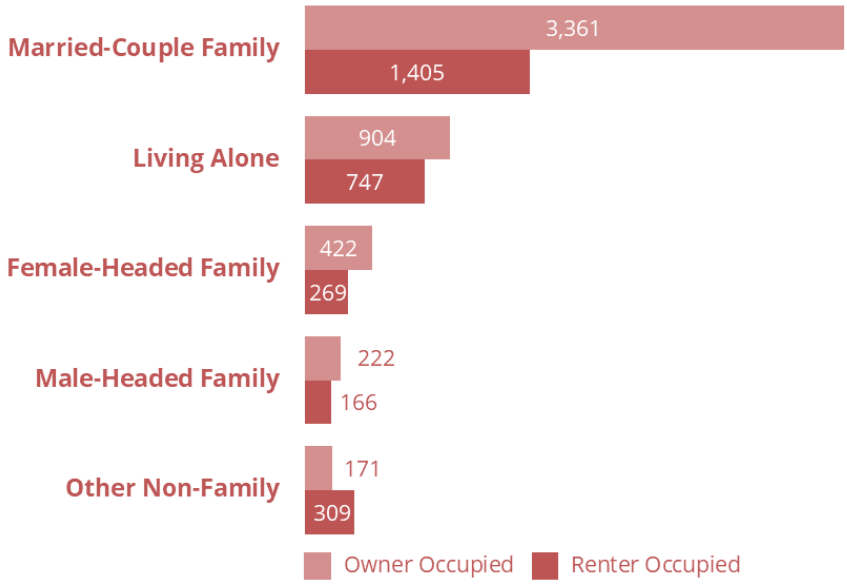
Figure II-20. Share of Households by Presence of Children (Less than 18 years old), 2019



Source: ABAG Housing Needs Data Workbook

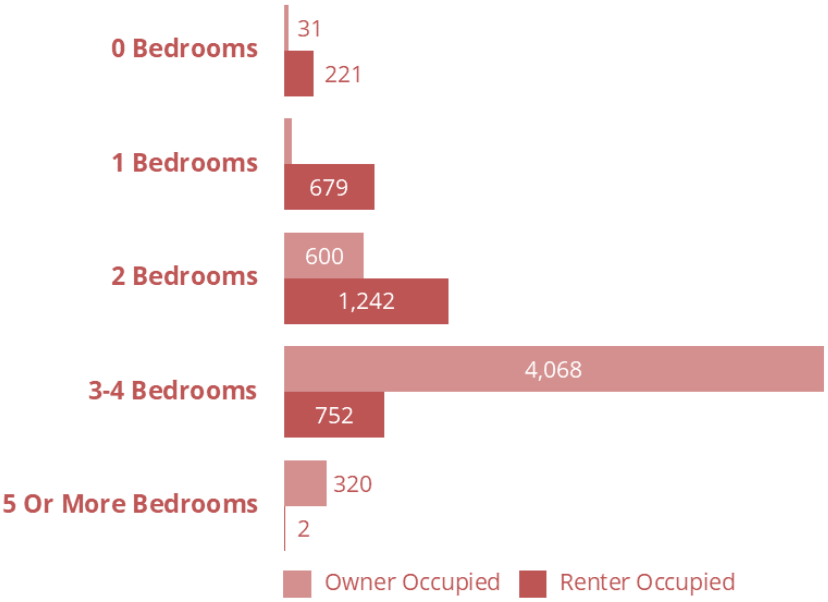
Familial status can indicate specific housing needs and preferences. A larger number of married families and larger households indicates a need for three-to-four-bedroom units, both for the rental and for-sale market. **The majority of households live in owner-occupied housing, regardless of familial status**, except for other non-family households (e.g., roommates) who are more likely to be renters (Figure II-21). Most owner-occupied units are three-to-four bedrooms compared to the majority of rental units with one-to-two bedrooms (Figure II-22). The distribution of households by family type is mapped at the census tract level (Figures II-23, II-24, II-25, and II-26).

Figure II-21. Housing Type by Tenure, City of Millbrae, 2019



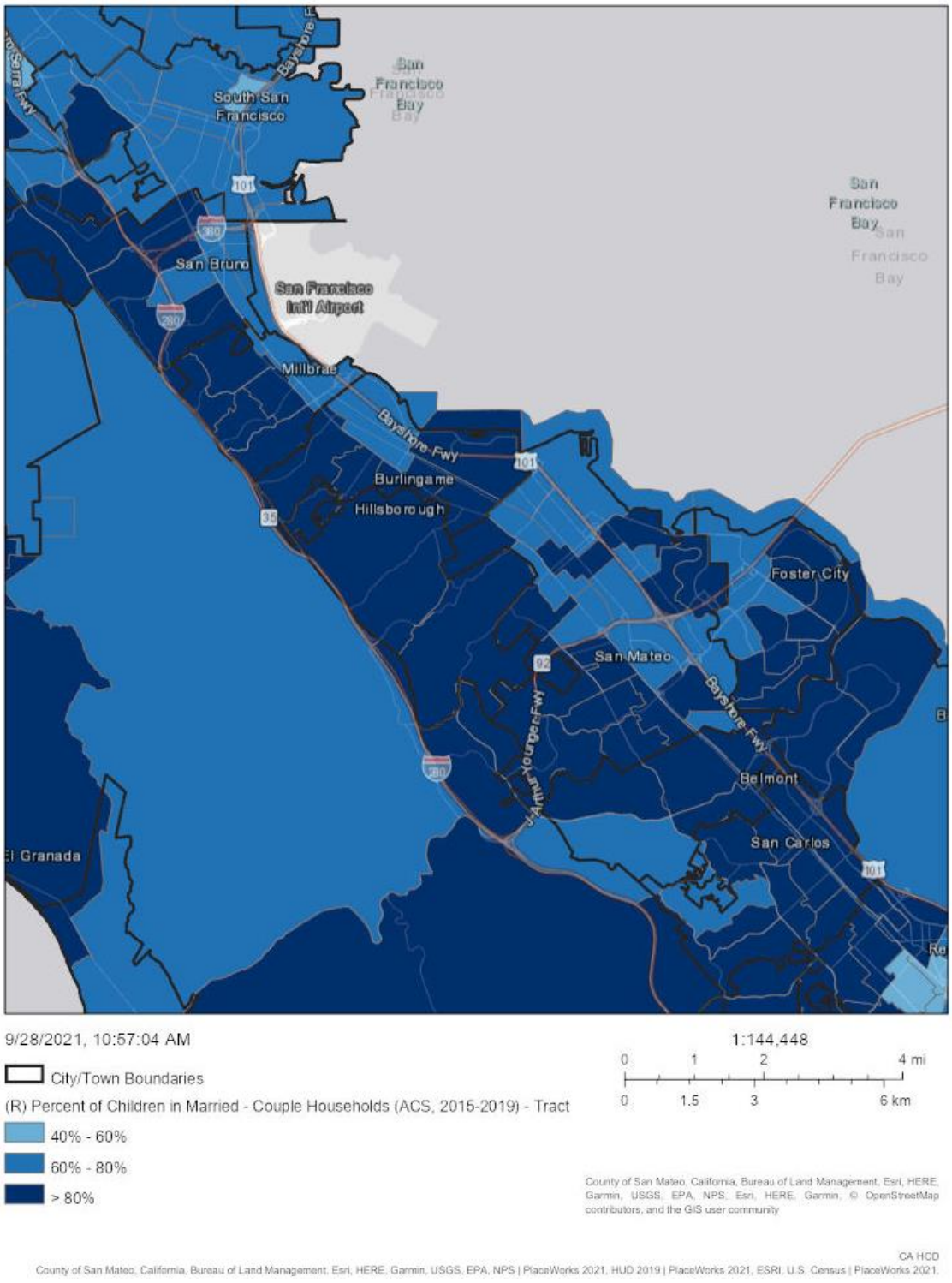
Source: ABAG Housing Needs Data Workbook

Figure II-22. Housing Units by Number of Bedrooms and Tenure, City of Millbrae, 2019



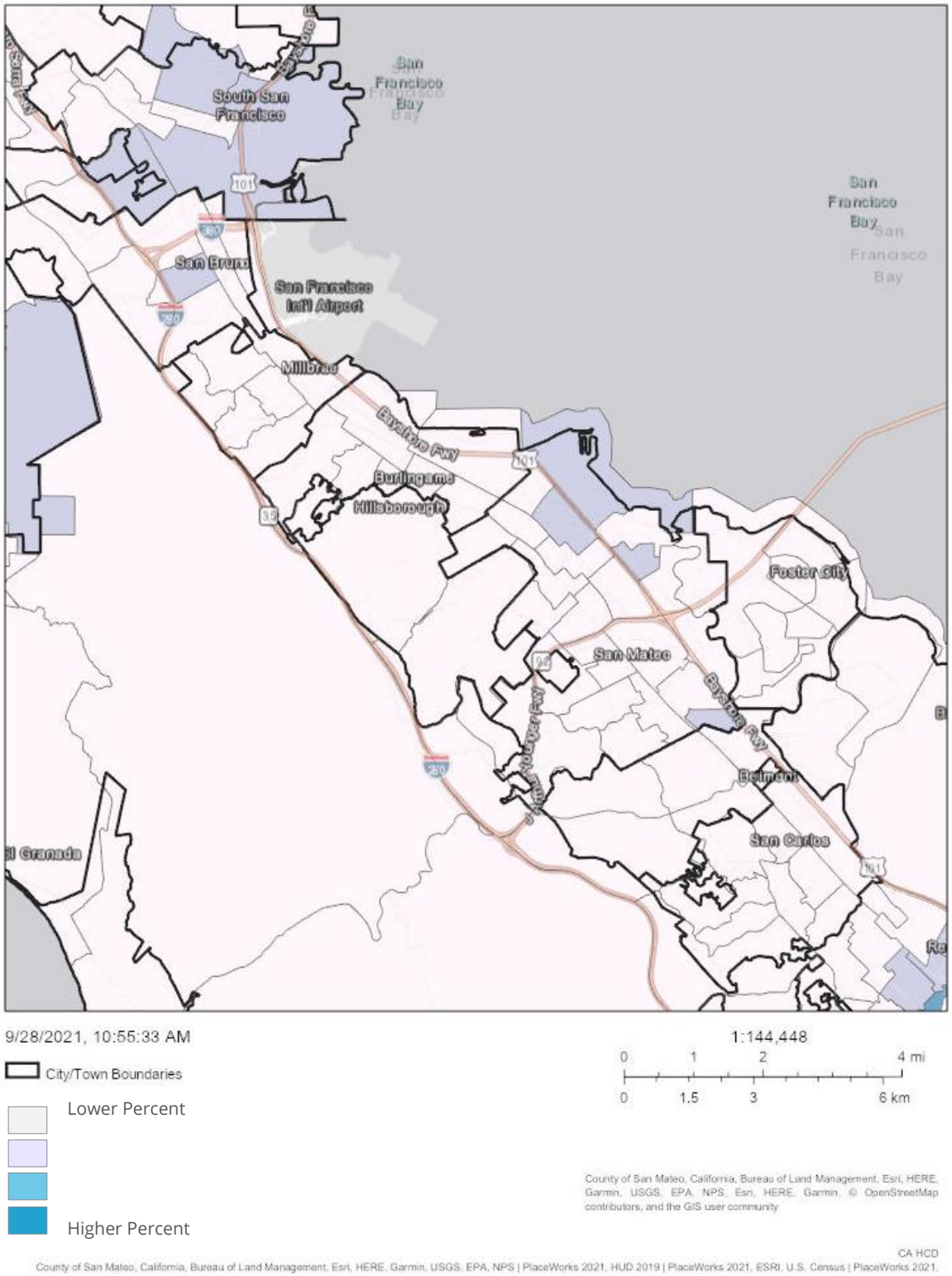
Source: ABAG Housing Needs Data Workbook

Figure II-23. Percent of Children in Married Couple Households by Census Tract, 2019



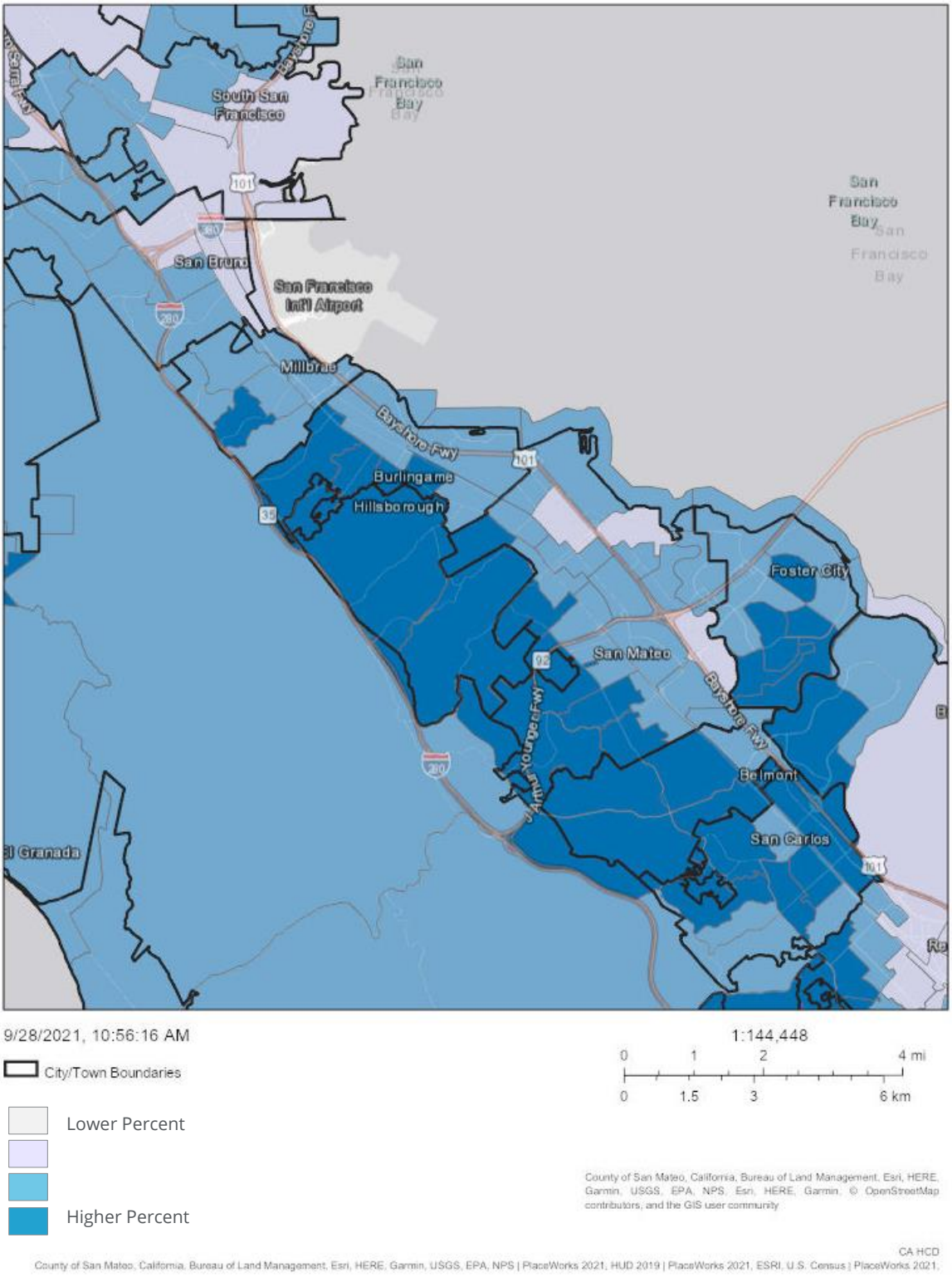
Source: California Department of Housing and Community Development AFFH Data Viewer

Figure II-24. Percent of Households with Single Female with Children by Census Tract, 2019



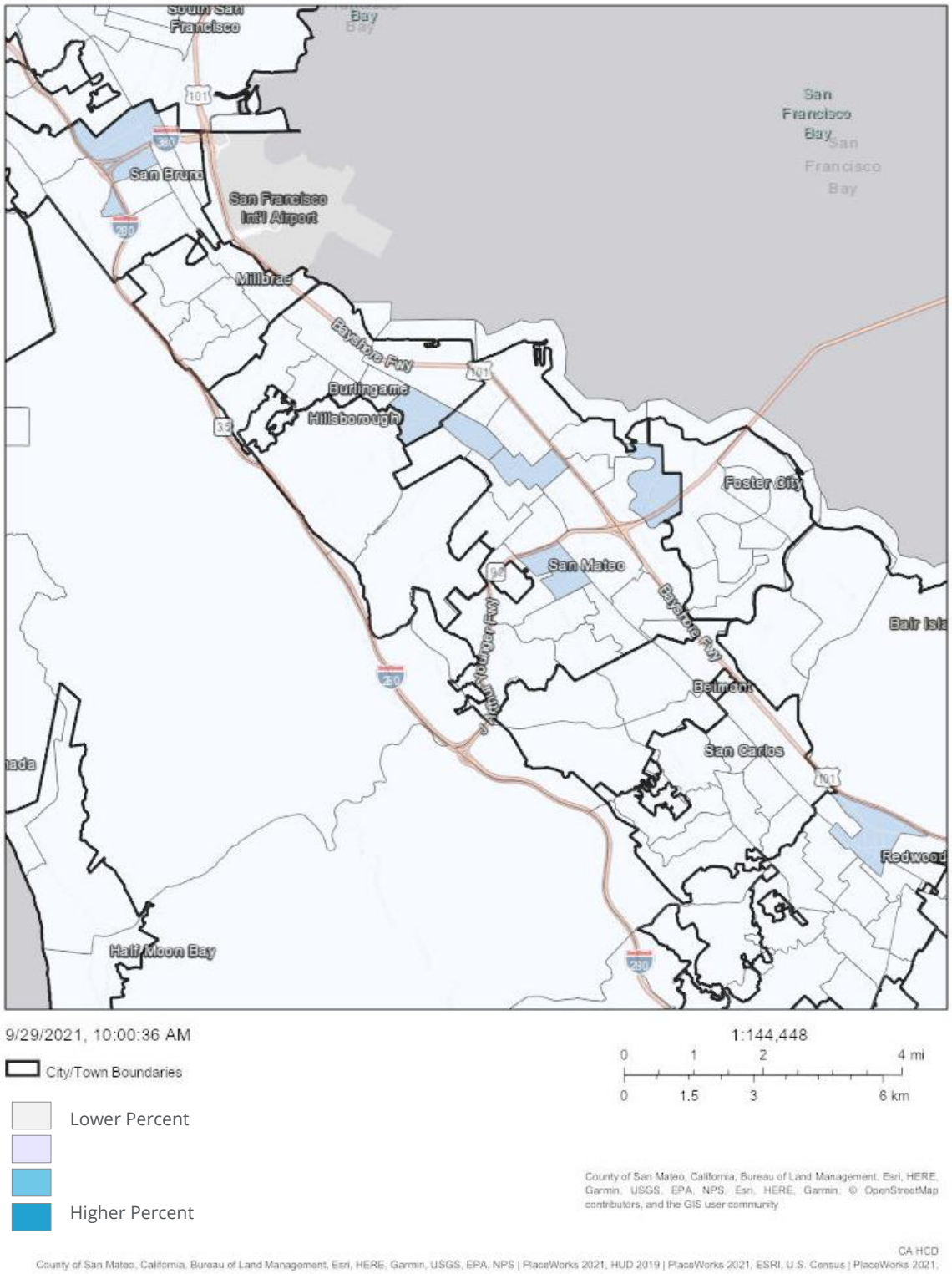
Source: California Department of Housing and Community Development AFFH Data Viewer

Figure II-25. Percent of Married Couple Households by Census Tract, 2019



Source: California Department of Housing and Community Development AFFH Data Viewer

Figure II-26. Percent of Adults Living Alone by Census Tract, 2019



Source: California Department of Housing and Community Development AFFH Data Viewer

Household Income

Region

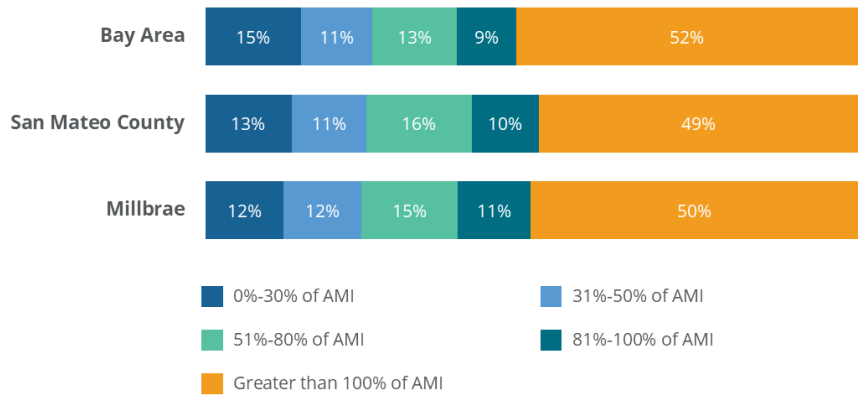
Income segregation and integration are important factors that determine the equitable quality of life in a community. In 2018, the UC Berkeley Othering & Belonging Institute published "Racial Segregation in the San Francisco Bay Area," a five-part study of segregation, demographics, the effects of segregation, and possible remedies (2018 UCB Segregation Study). When discussing San Mateo County, the 2018 UCB Segregation Study states the following:

San Mateo County extends south of San Francisco to encompass the San Francisco airport and suburbs and the northern part of Silicon Valley. It is therefore one of the most affluent places in America and home to several corporate campuses for Fortune 500 and 100 companies.

As part of San Mateo County, the City of Millbrae has a thriving economy, and many residents work in professional, scientific, healthcare, and technical services, among others. As such, the City has a household income that exceeds that of many cities in the Bay Area and San Mateo County. According to the American Community Survey (ACS) 5-year estimates for 2019, the median household income in the **City of Millbrae was $128,494,** while **San Mateo County had a median household income of $122,641.** However, the high cost of living and limited affordable housing options make housing affordability an important issue to address. As shown in Figure 2-27 in Chapter 2, Community Profile, the City, County, and Bay Area had median rents of $3,258, $3,165, and $2,895, respectively. Despite the City's higher median income, higher median rents and home values in Millbrae (as shown in Figure 2-26 in Chapter 2, Community Profile) make it difficult for families in Millbrae to enjoy the benefits of such income.

The household income distribution by percent of area median income (AMI) in the City of Millbrae is nearly identical to the County and Bay Area in terms of Median Income. However, the City has a lower number of Extremely Low-Income households than the Bay Area and the County (Figure II-27).

Figure II-27. Share of Households by Area Median Income (AMI), 2019



Source: ABAG Housing Needs Data Workbook

Millbrae

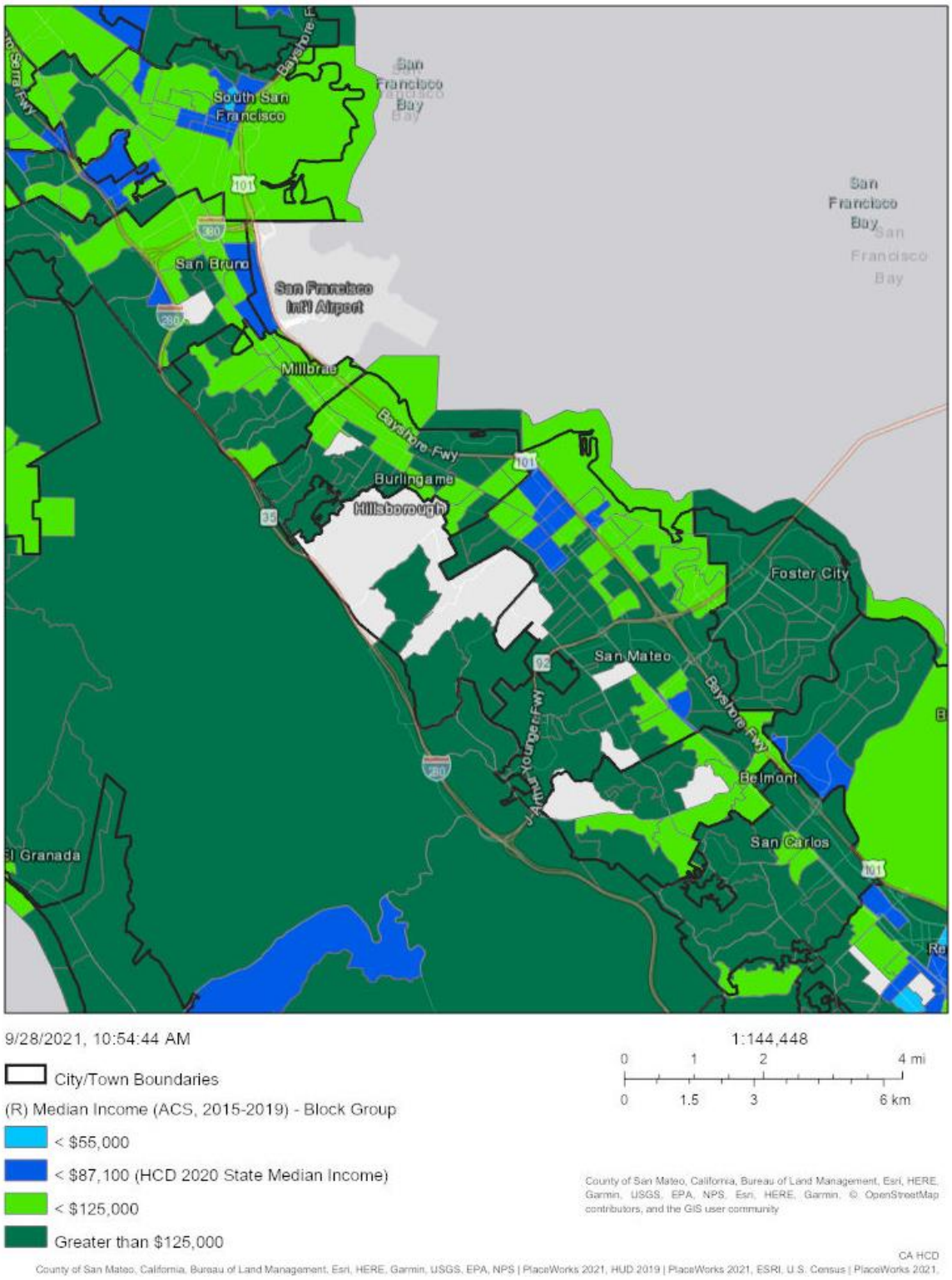
In the City of Millbrae, income trends show a significant degree of income segregation. As shown in Figure II-27, half of the households earn incomes above the County's AMI compared to the rest of the population. Geographically, median household income in the City of Millbrae by block group reveals higher incomes in the western areas of the City with medians above $125,000 compared to the east with medians between $87,100 and $125,000 (Figure II-28 and Figure II-29).

Figure II-28 features area Block Groups and their median household income. **Each tract within the City of Millbrae has an Area Median Income above the state median ($87,100).** Furthermore, the City's northern block groups have a large share of the City's residents living with a disability—who may be living on a fixed income.

There are a small number of Census Block Groups with a concentration of low to moderate-income households, primarily along El Camino Real (Figure II-29). The site inventory includes several sites planned for very low-, low- and moderate-income housing, and **nearly all of the Sites Inventory sites are within the identified lower-income block groups.**

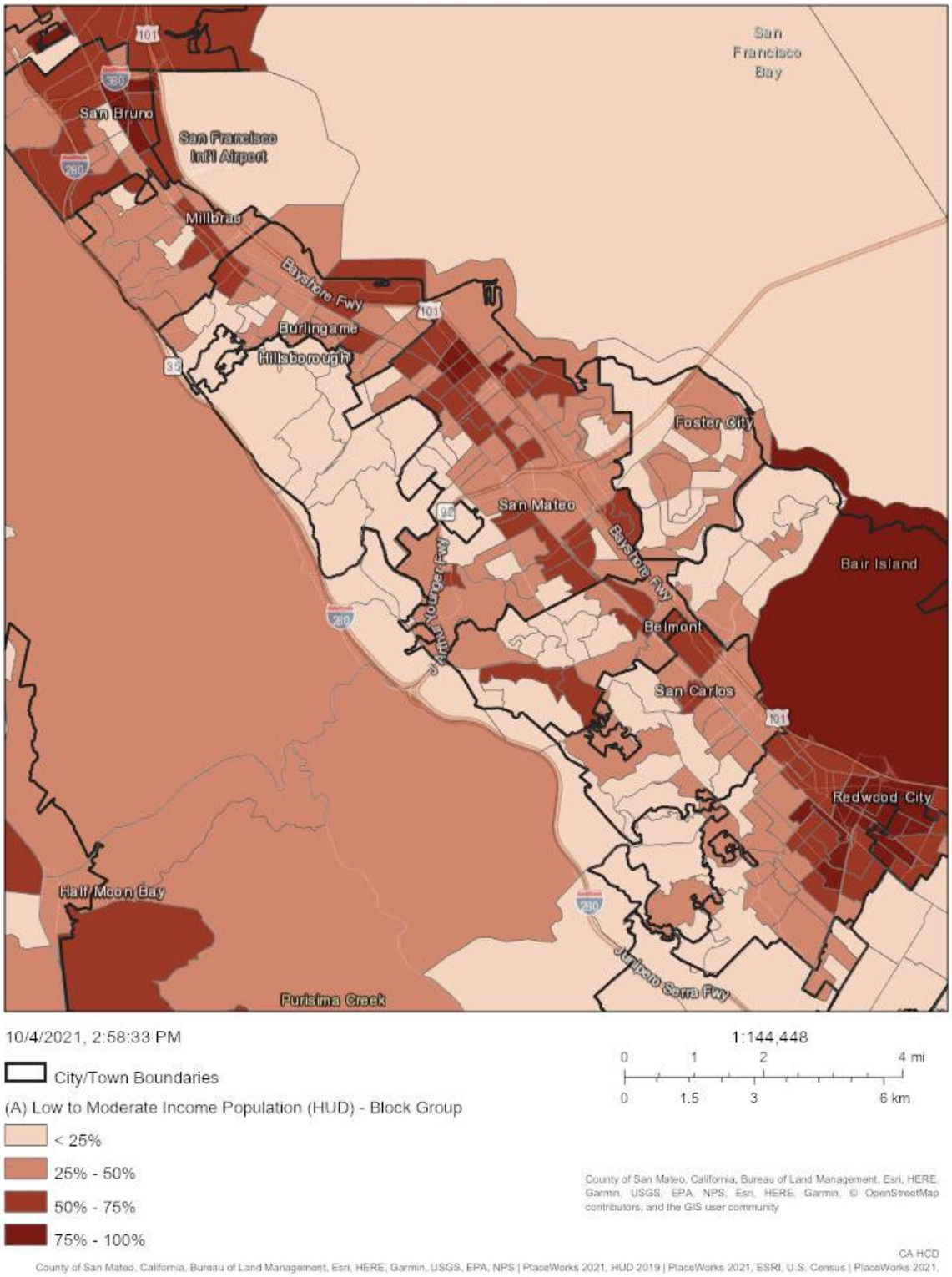
Figure II-30 shows the poverty levels for Census Tracts in and around the City. There is a Tract in the southern area of the City where 10 – 20 % of its population has poverty status (Tract 6049). This is due to the relatively smaller population and number of households to other Tracts within the City, as well as the Tract's larger size and contents. Tract 6049 has just the fourth largest population and number of households within the City while being the City's largest Tract. The Tract also features a large amount of park and green space. Ultimately, **100% of Sites Inventory sites are located outside of Tract 6049, providing housing options to those in need, while avoiding undue concentrations of poverty.**

Figure II-28. Median Household Income by Block Group, 2019



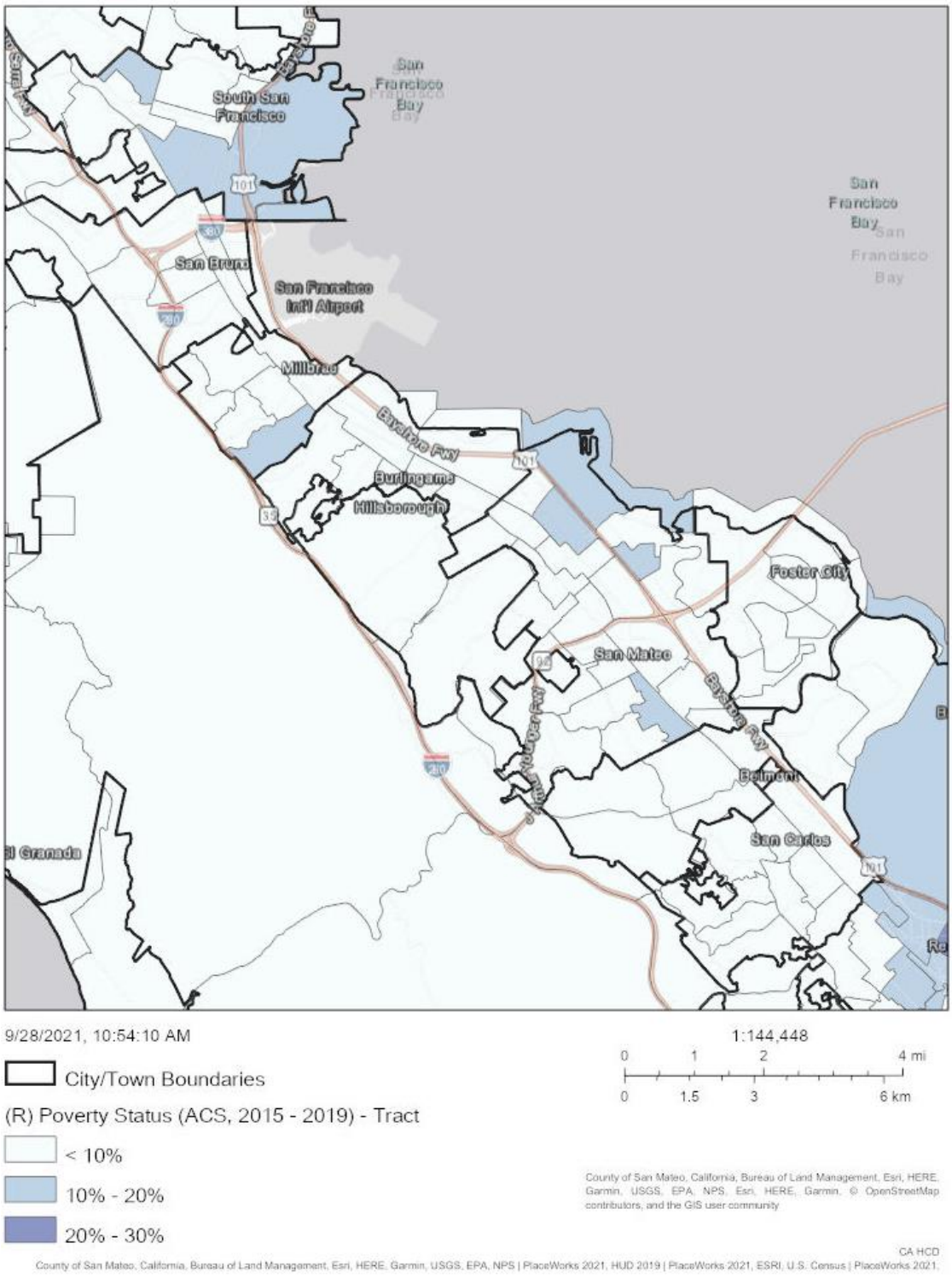
Source: California Department of Housing and Community Development AFFH Data Viewer

Figure II-29. Low to Moderate-income Population by Block Group



Source: California Department of Housing and Community Development AFFH Data Viewer

Figure II-30. Poverty Status by Census Tract, 2019



Source: California Department of Housing and Community Development AFFH Data Viewer

Addressing Income Segregation

Income segregation and integration play a critical role in determining the equitable quality of life in a community. In Millbrae, the significant degree of income segregation, paired with a lack of affordable housing options have led to a widening income gap between high and low-income households within the City's neighborhoods. To address this issue, the City included the following programs in Chapter 8, Housing Plan:

- **HIP-1.** Triennial Advocacy Meeting with Affordable Housing Property Owners/Managers, Fair Housing Providers, Service Providers, Housing Advocates, and Non-Profits
- **HIP-3.** Annual Meeting with San Mateo County Housing Authority and the San Mateo County Consortium to Identify Affordable Housing Opportunities
- **HIP-15.** Continue to Implement the Millbrae Station Area Specific Plan
- **HIP-16.** Downtown and El Camino Real Specific Plan Implementation
- **HIP-21.** Services for Unhoused Persons
- **HIP-23.** Prioritize Review and Expedite Development of Affordable and Special Needs Projects
- **HIP-24.** Lot Consolidation within the Millbrae Station Area
- **HIP-31.** Pursue State and Federal Funding for Affordable Housing
- **HIP-32.** Local Funding for Affordable Housing
- **HIP-33.** Allocate CDBG Funding for Housing
- **HIP-35.** Assist with Development of Lower-Income Housing
- **HIP-36.** Funding, Incentives, and Concessions for Extremely Low-Income Developments
- **HIP-37.** Advertise Available Resources
- **HIP-42.** Implement Reduced Parking for Affordable Housing

Racially or ethnically concentrated areas of poverty and affluence

Racially Concentrated Area of Poverty or Ethnically Concentrated Area of Poverty (R/ECAP) and Racially Concentrated Areas of Affluence (RCAAs) represent opposing ends of the segregation spectrum from racially or ethnically segregated areas with high poverty rates to affluent predominantly White neighborhoods. Historically, HUD has paid particular attention to R/ECAPs as a focus of policy and obligations to AFFH. Recent research out of the University of Minnesota

Humphrey School of Public Affairs argues for the inclusion of RCAAs to acknowledge current and past policies that created and perpetuated these areas of high opportunity and exclusion.[12]

There were no R/ECAPs located in the City of Millbrae based on 2010 census data (Figure II-31). Additionally, there are no R/ECAPs in Millbrae based on 2019 data (Figure II-32). However, in the County, 2010 census data indicates that three census tracts qualify as R/ECAPs (19.4% poverty rate) and 11 that qualify as edge R/ECAPs (13% poverty rate). In 2019, two census tracts qualify as R/ECAPs (19.1% poverty rate) in the County, and 14 qualify as edge R/ECAPs (12.8% poverty rate).

It is important to note that R/ECAPs and RCAAs are not areas of focus because of racial and ethnic concentrations alone. This study recognizes that racial and ethnic clusters can be a part of fair housing choices if they occur in a non-discriminatory market. Rather, R/ECAPs are meant to identify areas where residents may have historically faced discrimination and continue to be challenged by limited economic opportunity, and conversely, RCAAs are meant to identify areas of particular advantage and exclusion.

R/ECAPs

HCD and HUD's definition of a Racially/Ethnically Concentrated Area of Poverty is:

A census tract that has a non-White population of 50% or more (majority-minority) or, for non-urban areas, 20%, AND a poverty rate of 40% or more; OR

A census tract that has a non-white population of 50% or more (majority-minority) AND the poverty rate is three times the average tract poverty rate for the County, whichever is lower.

Source: California Department of Housing and Community Development Guidance, 2021.

For this study, the poverty threshold used was three times the average tract poverty rate for the County—or 19.1%. In addition to R/ECAPs that meet the HUD threshold, this study includes edge or emerging R/ECAPs that hit two-thirds of the HUD-defined threshold for poverty—emerging R/ECAPs in San Mateo County have 2 times the average tract poverty rate for the County (12.8%).

[12] Goetz, E. G., Damiano, A., & Williams, R. A. (2019). Racially Concentrated Areas of Affluence: A Preliminary Investigation. Cityscape: A Journal of Policy Development and Research, 21(1), 99–124

Figure II-31. R/ECAPs and Edge R/ECAPs, 2010

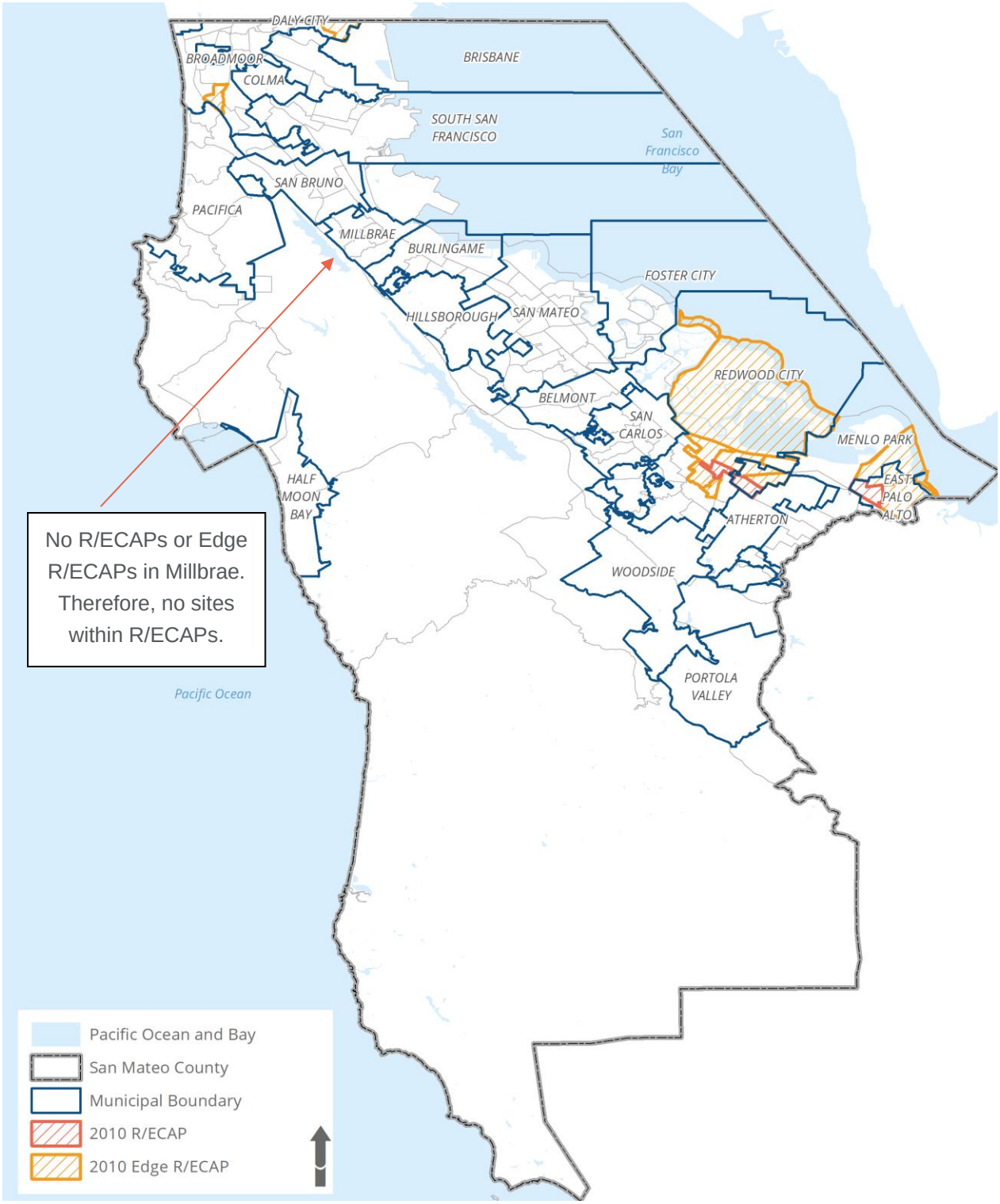
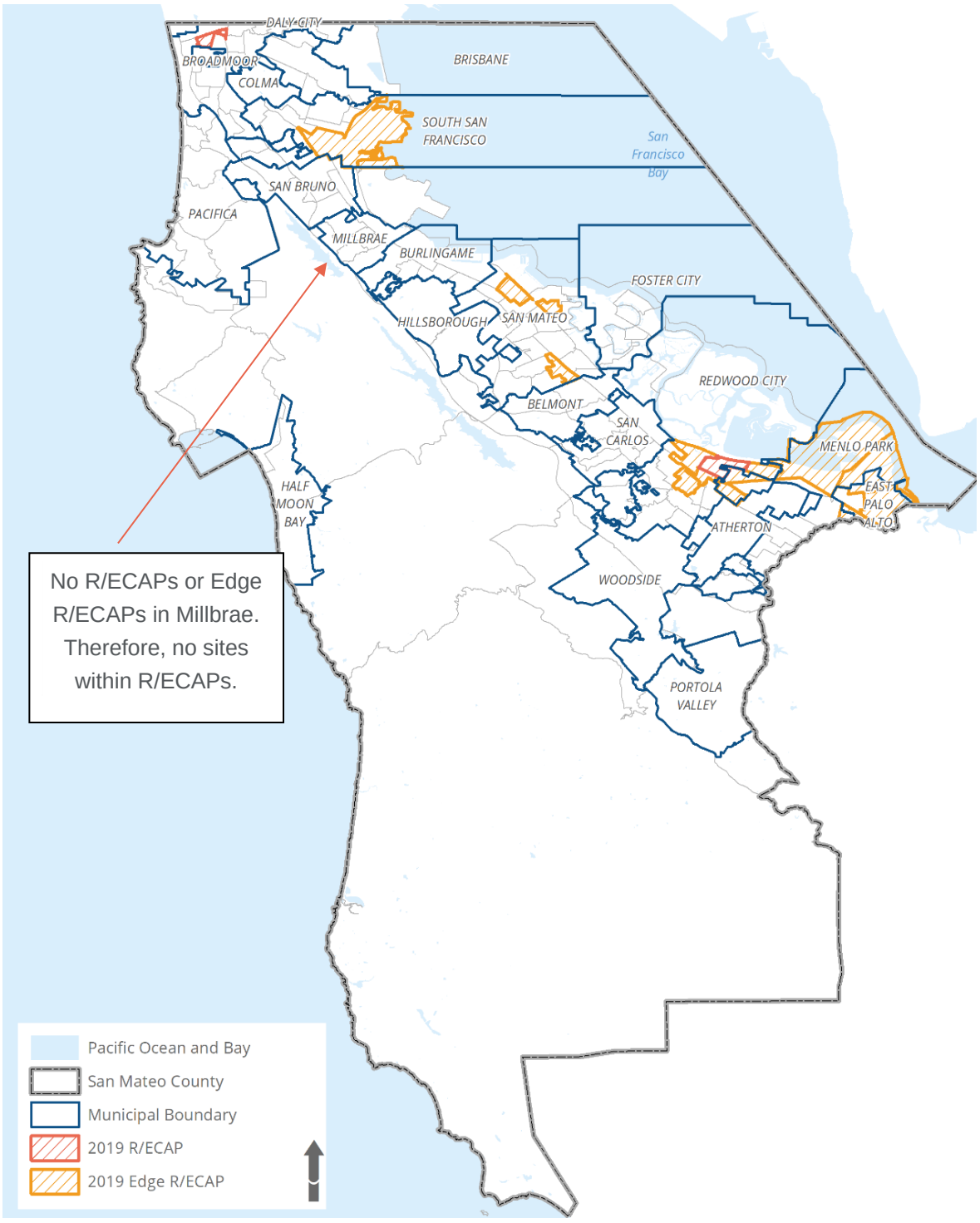


Figure II-32. R/ECAPs and Edge R/ECAPs, 2019



Note: R/ECAPs are census tracts that have a non-white population of 50% or more (majority-minority) AND the poverty rate is three times the average tract poverty rate for the County (19.1% in 2010). Edge R/ECAPs are census tracts that have a non-white population of 50% or more (majority-minority) AND the poverty rate is two times the average tract poverty rate for the County (12.8% in 2019).

Source: California Department of Housing and Community Development AFFH Data Viewer

Racially Concentrated Area of Affluence

HCD's definition of a Racially Concentrated Area of Affluence is:

- A census tract that has a percentage of the total white population that is 1.25 times higher than the average percentage of the total white population in the given ABAG region, and a median income that was 2 times higher than the ABAG AMI.

While R/ECAPs have long been the focus of fair housing policies, racially concentrated areas of affluence (RCAAs) must also be analyzed to ensure housing is integrated, a key to fair housing choice. According to "Racially Concentrated Areas of Affluence: A Preliminary Investigation" authored by Edward G. Goetz, Anthony Damiano, and Rashad A. Williams of the Center for Urban and Regional Affairs, University of Minnesota (a policy paper published by HUD), RCAA is defined as an affluent, White community. The policy paper goes on to state that "Whites are the most racially segregated group in the United States and in the same way neighborhood disadvantage is associated with concentrated poverty and high concentrations of people of color, conversely, distinct advantages are associated with residence in affluent, White communities."

RCAAs have not been studied extensively or defined precisely by the HCD or HUD. The Housing Element uses a definition based on extensive coordination with HCD and the preparation of multiple Housing Elements. That definition uses the percentage of the White population (i.e., 40%) and median household income (top quartile) as proxies to identify potential areas of racial concentration and affluence.

Figure II-33 shows that while much of San Mateo County qualifies as an RCAA, there are no RCAAs located within the City of Millbrae. Therefore, no Site Inventory sites are located within RCAAs (Figure II-34).

Figure II-33. RCAAs and Edge RCAAs, 2019 (Countywide)

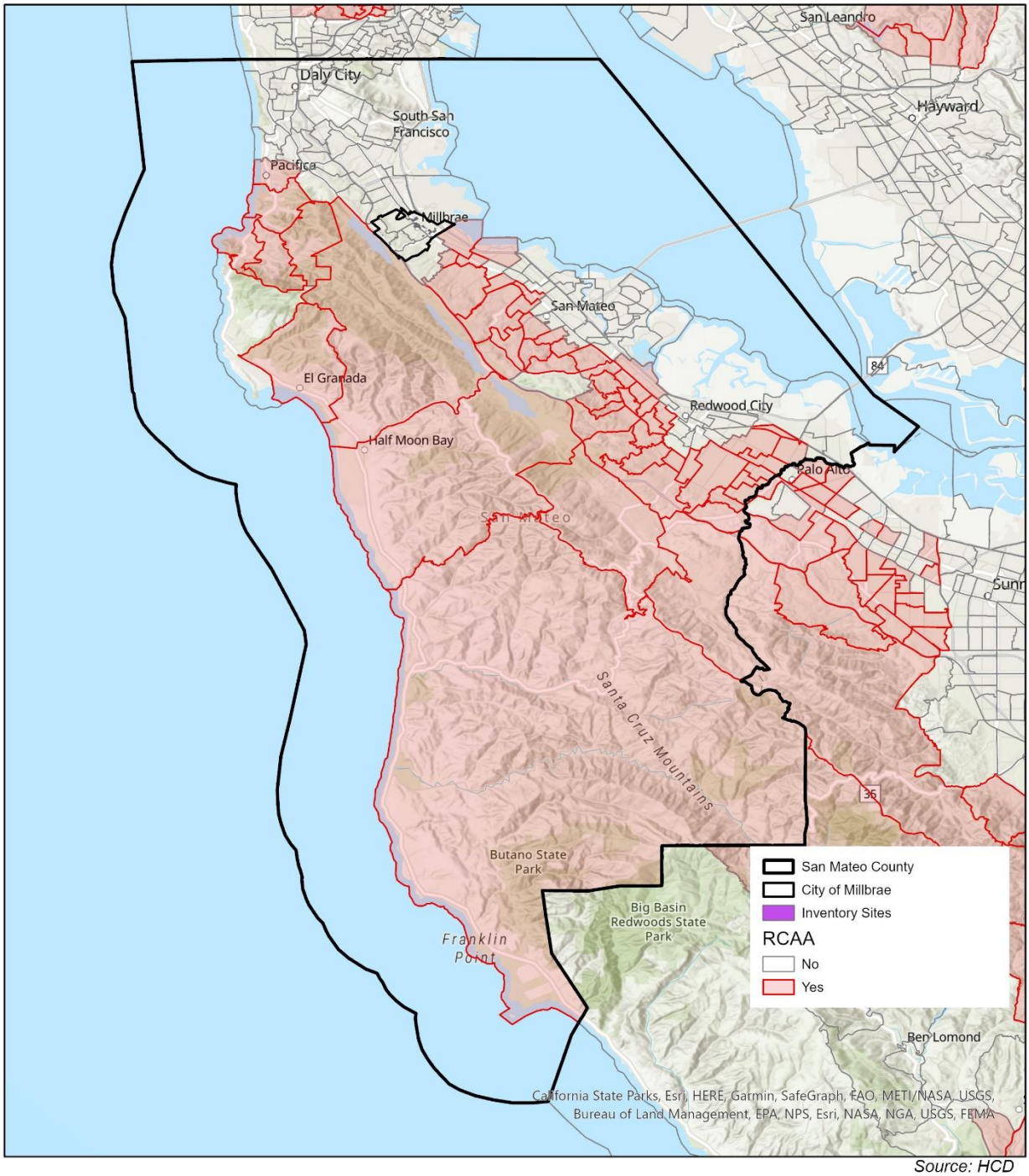
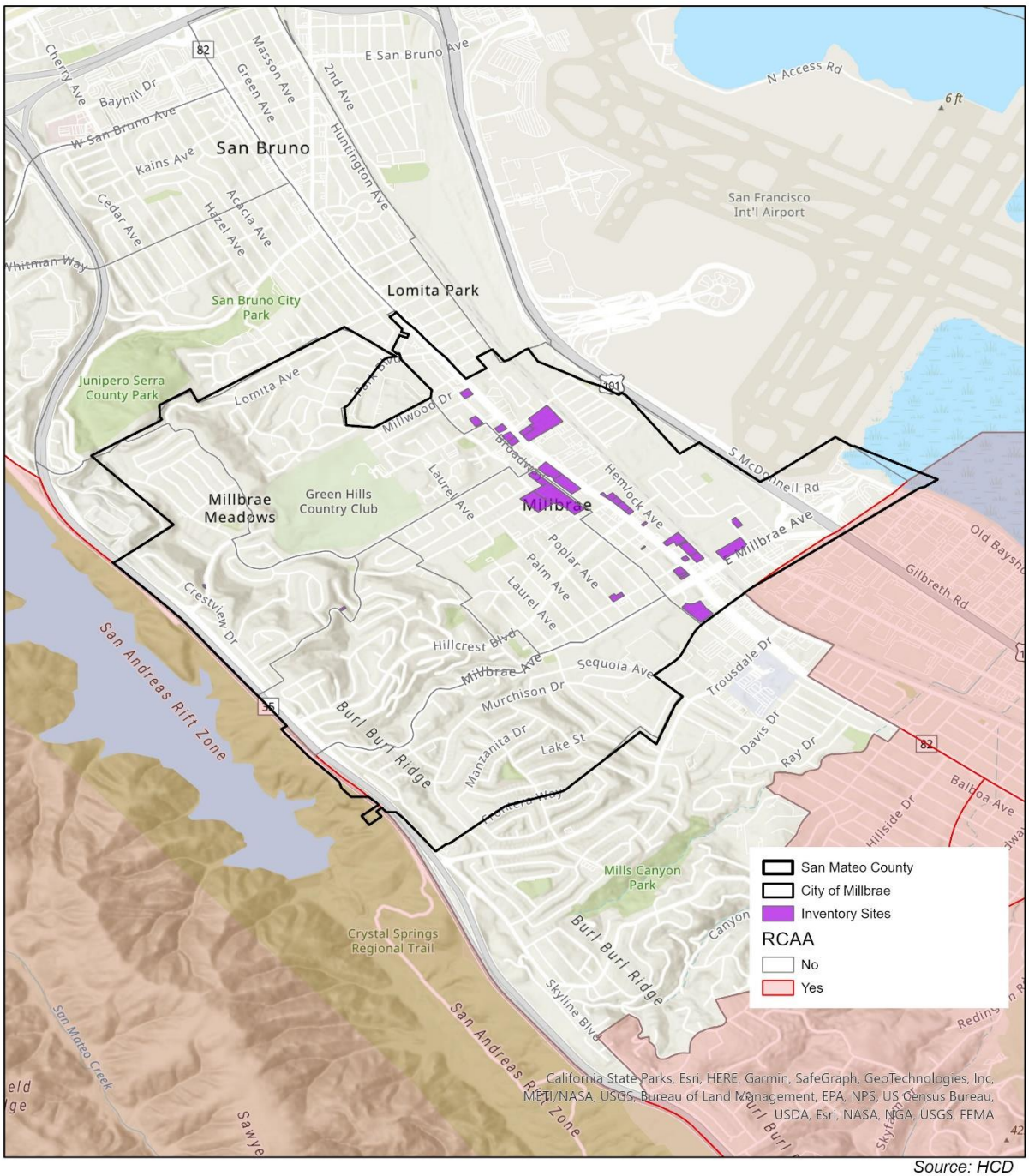


Figure II-34. Sites Inventory and Racially Concentrated Areas of Affluence – Sites Depicted (RCAAs)



Source: HCD

Harris & Associates

N

0 0.5 1 Miles

Sites Inventory and RCAAs

City of Millbrae Affirmatively Furthering Fair Housing

SECTION III. Access to Opportunity

This section discusses disparities in access to opportunity among protected classes including access to quality education, employment, transportation, and environment.

Access to Opportunity

"Access to opportunity is a concept to approximate place-based characteristics linked to critical life outcomes. Access to opportunity oftentimes means both improving the quality of life for residents of low-income communities, as well as supporting mobility and access to 'high resource' neighborhoods. This encompasses education, employment, economic development, safe and decent housing, low rates of violent crime, transportation, and other opportunities, including recreation, food, and a healthy environment (air, water, safe neighborhood, safety from environmental hazards, social services, and cultural institutions)."

Source: California Department of Housing and Community Development Guidance, 2021, page 34.

A detailed analysis of all components affecting Access to Opportunity is provided below.

Local knowledge: resident survey questions about access to opportunity

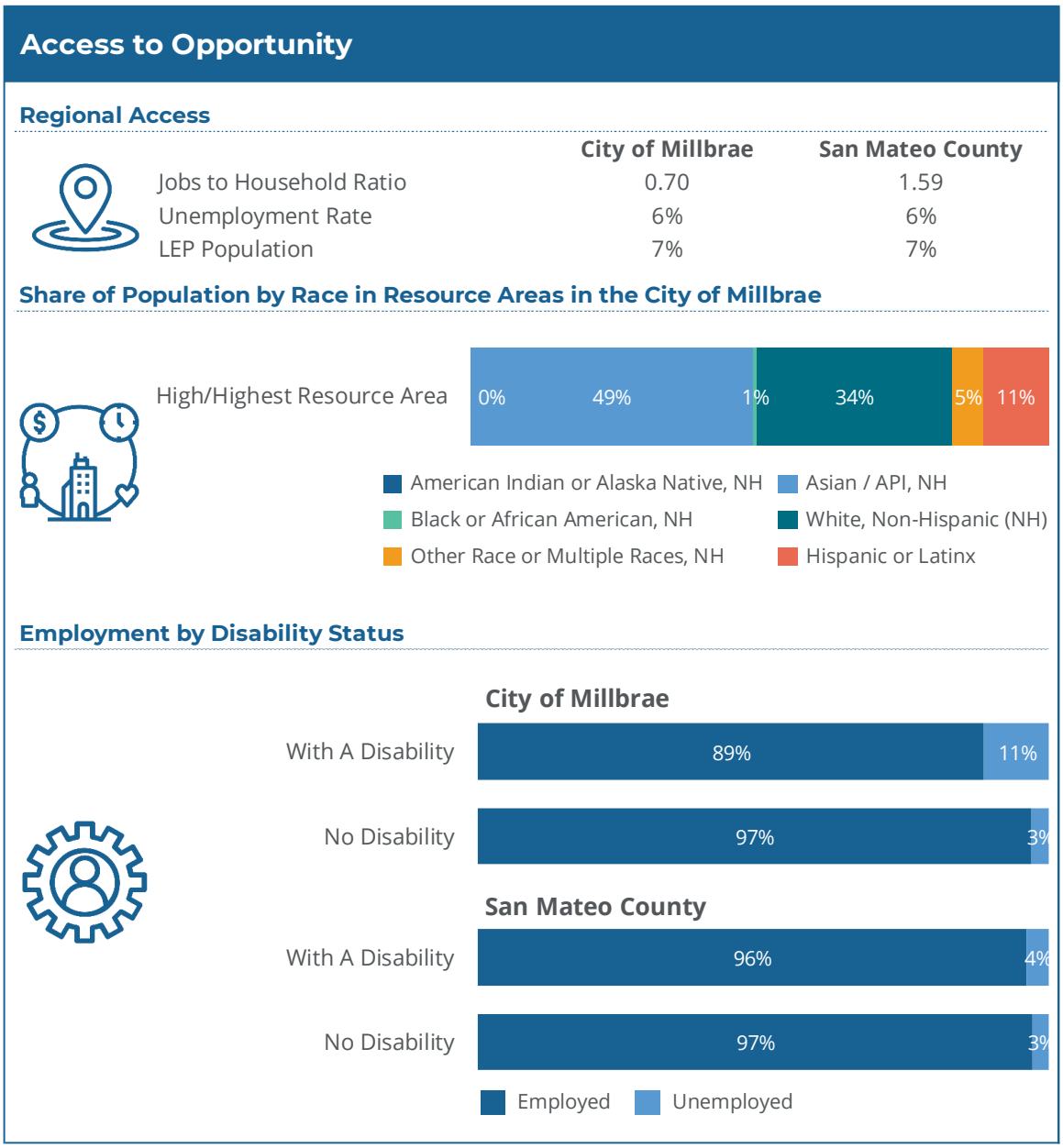
Residents were asked about several resources that would improve their living situation in the survey conducted to support this AFFH. When asked what type of help they need to **improve their housing security**, the top answers were:

- Help me get a loan to buy a house (21%);
- Help me with a down payment/purchase (21%); and
- Help me with the housing search (19%).
- When asked what type of help they need to **improve their neighborhood**, the top answers were:
    - Better lighting (45%);
    - Reduce crime (42%); and
    - More welcoming/accepting neighbors (32%).
- When asked what type of help they need to **improve their health**, the top answers were:
    - Make it easier to exercise (34%);
    - More healthy food (26%); and

    - Better/access to mental health care (24%).
- When asked what type of help they need to **improve their job situation**, the top answers were:
    - Increase wages (41%);
    - Find a job near my apartment/house (21%); and
    - Help paying for job training (15%).
- When asked what type of help they need to **improve children's education**, the top answers were:
    - Have better teachers at their school (29%);
    - Make it easier to choose a different school (24%); and
    - Make school more challenging (21%).
- 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 to improve 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 opportunities in quality education, employment, transportation, and environment. Opportunity scores are presented on a scale from zero to one and the higher the number, the more positive the outcomes.

A visual summary of access to opportunity in the City as compared to the County is provided in Figure III-1.

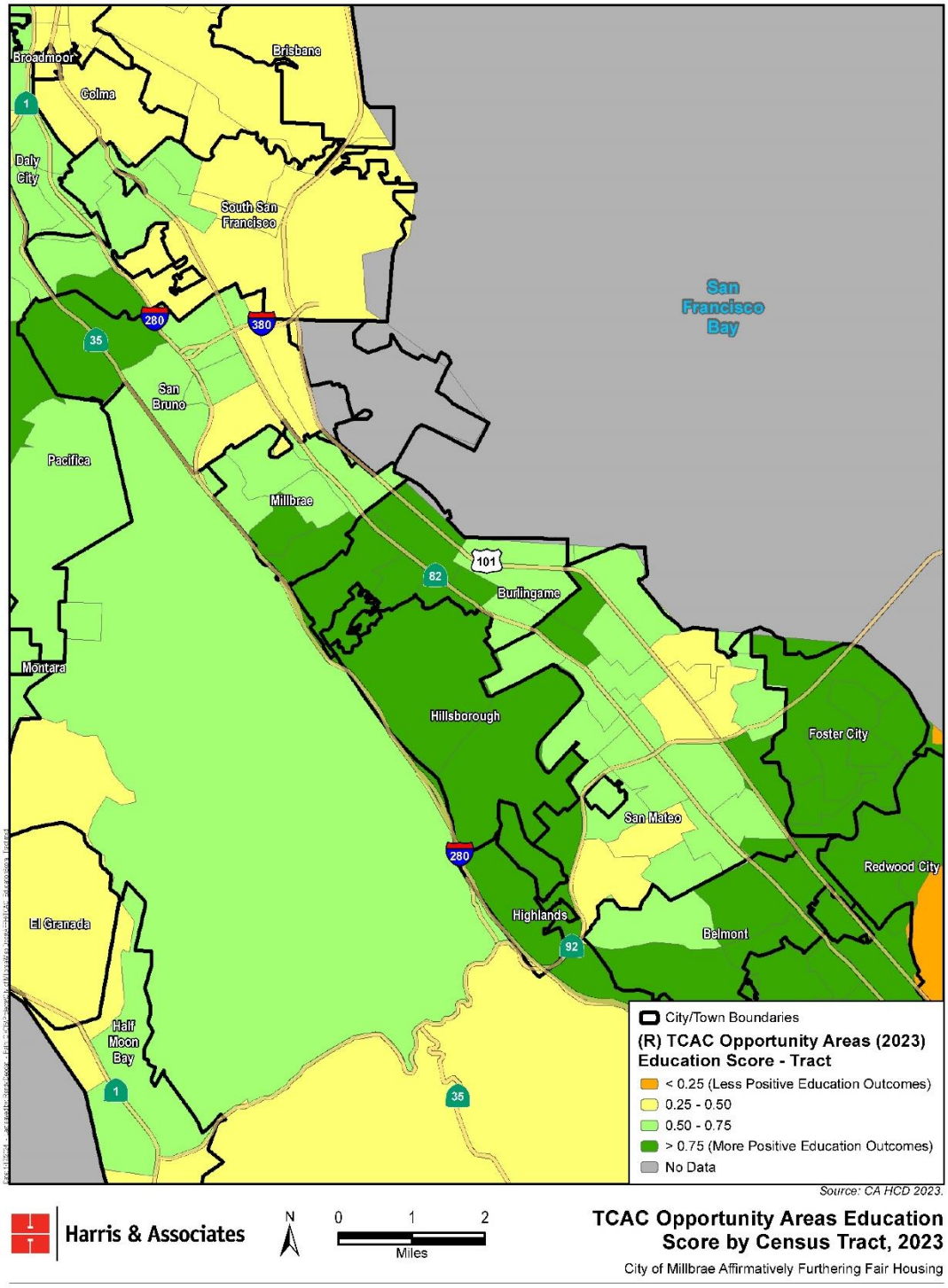
Figure III-1. Access to Opportunity



Education

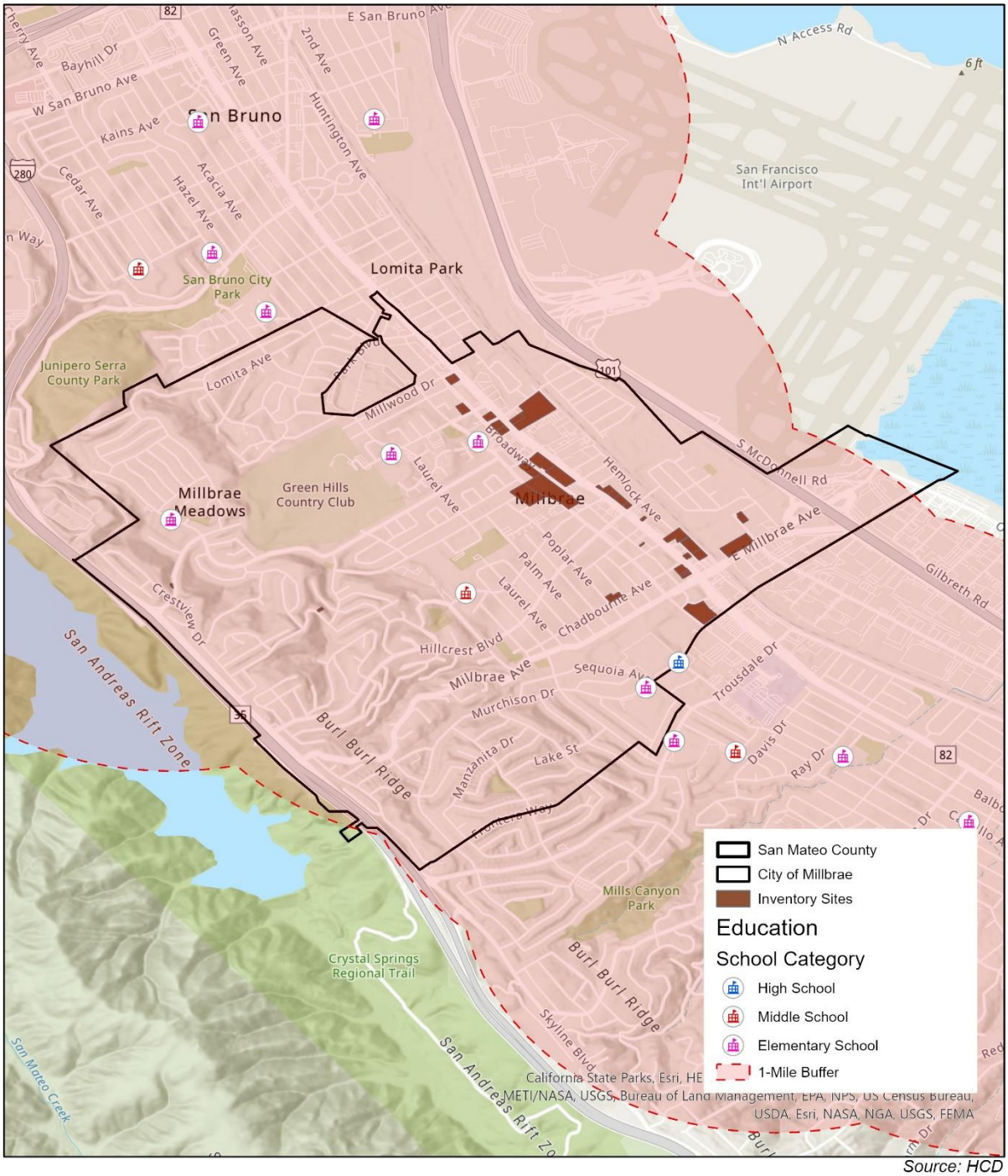
TCAC's education score is based on math proficiency, reading proficiency, high school graduation rates, and the student poverty rate. According to TCAC's educational opportunity map, all census tracts in the City of Millbrae score higher than 0.50—opportunity scores are presented on a scale from zero to one, and the higher the number, the more positive the outcomes (Figure III-2).

Figure III-2. TCAC Opportunity Areas Education Score by Census Tract, 2023



Source: California Department of Housing and Community Development AFFH Data Viewer

Figure III-3. Sites Inventory and School Proximity



Source: HCD

Harris & Associates

N

0 0.5 1 Miles

Site Inventory and School Proximity

City of Millbrae Affirmatively Furthering Fair Housing

Figure III-3 shows that the Sites Inventory Sites offer proximity to schools in the area with all of the sites being located within one mile of a school. The City of Millbrae is served by the San Mateo Union High School District and Millbrae Elementary School District. San Mateo Union increased enrollment by 16% from 2010 to 2020 and the elementary district enrollment increased by 1% over the same time. However, **both districts lost students during the COVID-19 pandemic.**

San Mateo Union enrollment by race and ethnicity is similar to the Countywide distribution. However, there is a higher proportion of Asian students in San Mateo Union (23% compared to 17% Countywide), a smaller proportion of Filipino students (5% compared to 8% Countywide), and Hispanic students (32% compared to 38% Countywide).

Millbrae Elementary School District has a larger proportion of Asian students (46% compared to 17% Countywide) and a lower share of Hispanic and non-Hispanic White students compared to the County. Across most school districts in San Mateo County, the share of Asian students is larger than the share of Asian faculty/staff. This suggests that Asian students are less likely than their peers to interact with a same-race teacher or staff member. The largest disparity is in Millbrae Elementary, where just 13% of the faculty identify as Asian compared to 46% of the student body, a 33-percentage point gap.

Millbrae also has a lower share of students who are English learners, on free or reduced lunch, are foster children, homeless, or migrants compared to other districts in the County. Overall, the elementary district is less diverse than the Countywide average, with a concentration of Asian students.

Many high schoolers in the County met admission standards for a University of California (UC) or California State University (CSU) school. Of the high school districts in San Mateo County, Sequoia Union had the highest rate of graduates who met such admission standards at 69% followed by San Mateo Union High with 68%. Pacific Islander, Hispanic, and Black students in the San Mateo Union district were less likely to meet the admission standards with rates of 29%, 46%, and 46% respectively. **San Mateo Union High School has relatively low dropout rates—4% of students—compared to other districts in the County. However, dropout rates among Hispanic (7%), Black (6%), and Pacific Islander students are higher**.

Research suggests that providing affordable housing improves educational outcomes for children of all ethnicities/races. More specifically, the Center for Housing Policy's 2014 article titled "The Impacts of Affordable Housing on Education: A Research Summary," states the following:

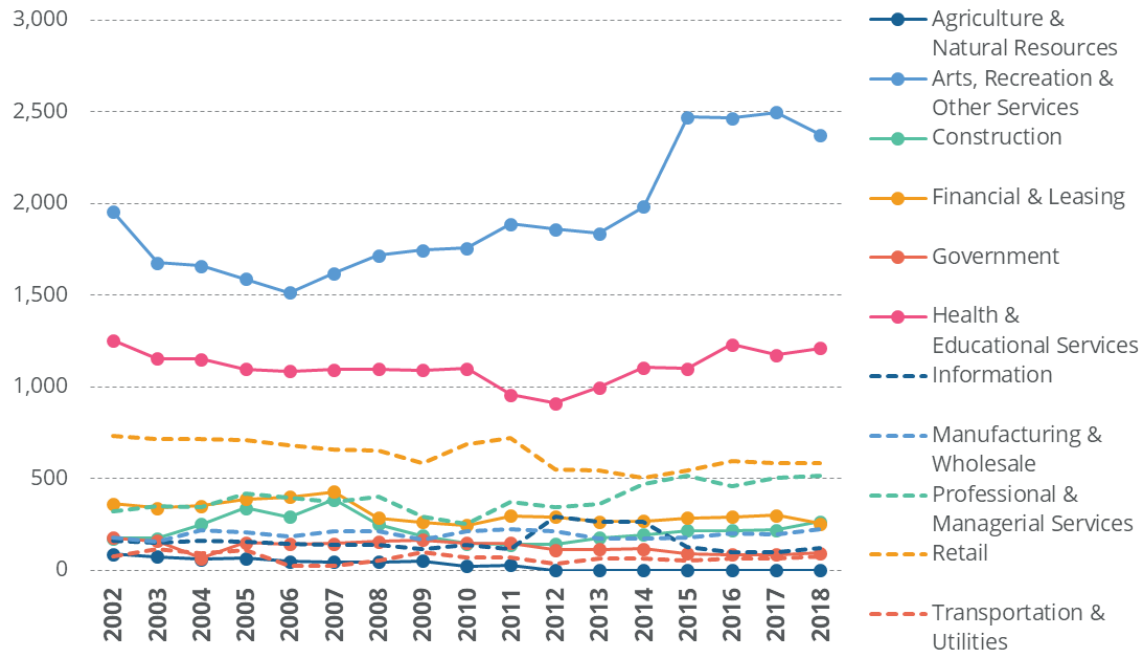
> *"A growing body of research suggests that stable, affordable housing may increase children's opportunities for educational success. A supportive and stable home environment can complement the efforts of educators, leading to improved student achievement. Affordable housing may foster the educational success of low-income children by supporting family financial stability, reducing mobility, providing safe, nurturing living environments, and providing a platform for community development."*

Programs HIP-1, 3, 15-16, 21, 23-24, 31-33, 35-37, and 42 seek to increase and encourage affordable housing in Millbrae which will help improve educational outcomes. Additionally, Program HIP-5 involves City staff meeting with the San Mateo Union High School District and San Mateo Unified School District annually to obtain input on what the City can do within its power to assist with educational outcomes.

Employment

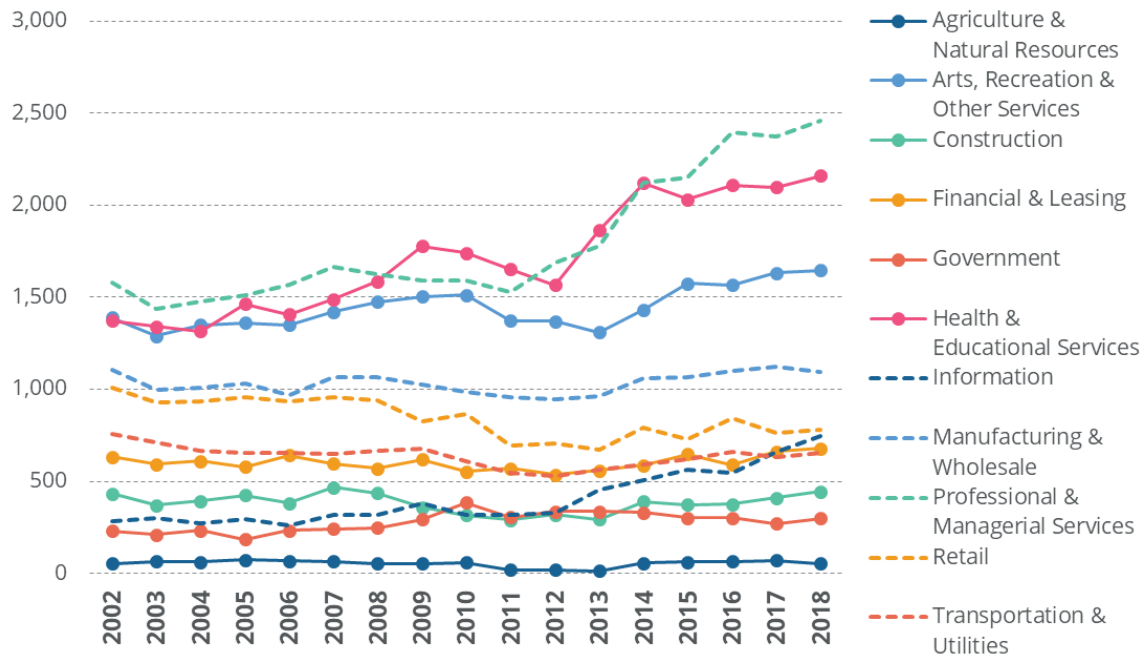
In 2018, the top three industries in the City of Millbrae were **arts/recreation and other services, health and educational services, and retail** (Figure III-4 and Figure III-5). The City is a **bedroom community with a low job-to-household ratio** of less than one compared to 1.59 in the County (Figure III-6 and Figure III-7). Unemployment rates in the City are similar to those County around 6% (Figure III-8).

Figure III-4. Jobs by Industry, City of Millbrae, 2002-2018



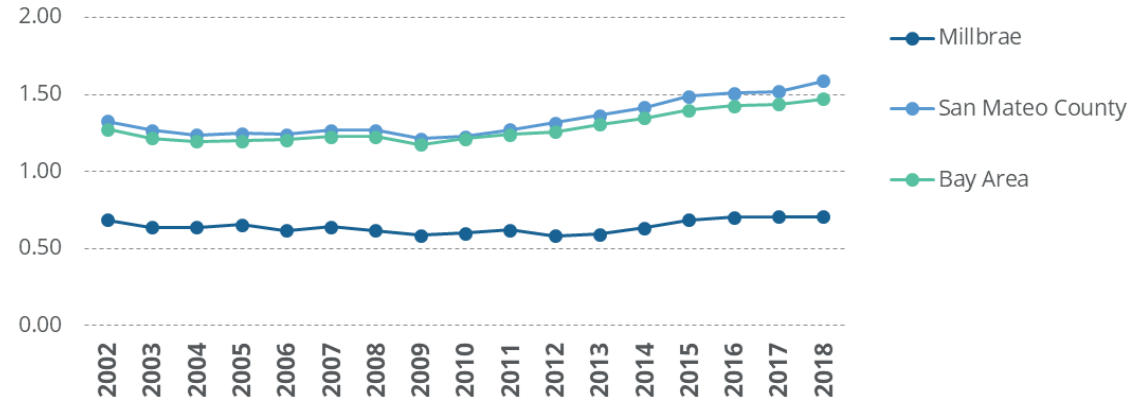
Source: ABAG Housing Needs Data Workbook

Figure III-5. Job Holders by Industry, City of Millbrae, 2002-2018



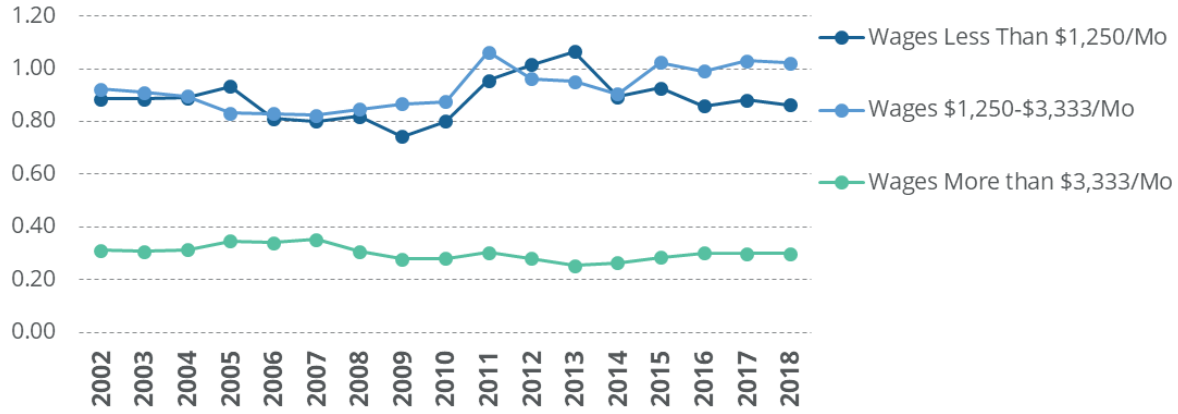
Source: ABAG Housing Needs Data Workbook

Figure III-6. Jobs to Household Ratio, City of Millbrae, 2002-2018



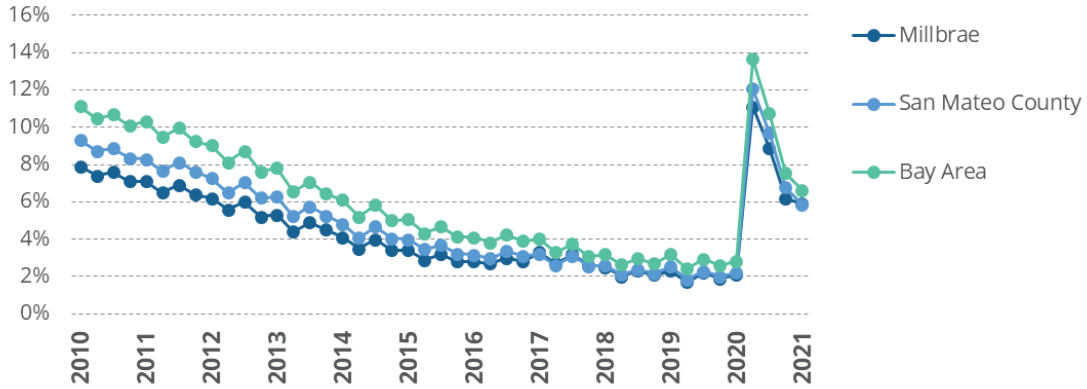
Source: ABAG Housing Needs Data Workbook

Figure III-7. Jobs to Worker Ratio by Wage, City of Millbrae, 2002-2018



Source: ABAG Housing Needs Data Workbook

Figure III-8. Unemployment Rate, 2010-2021

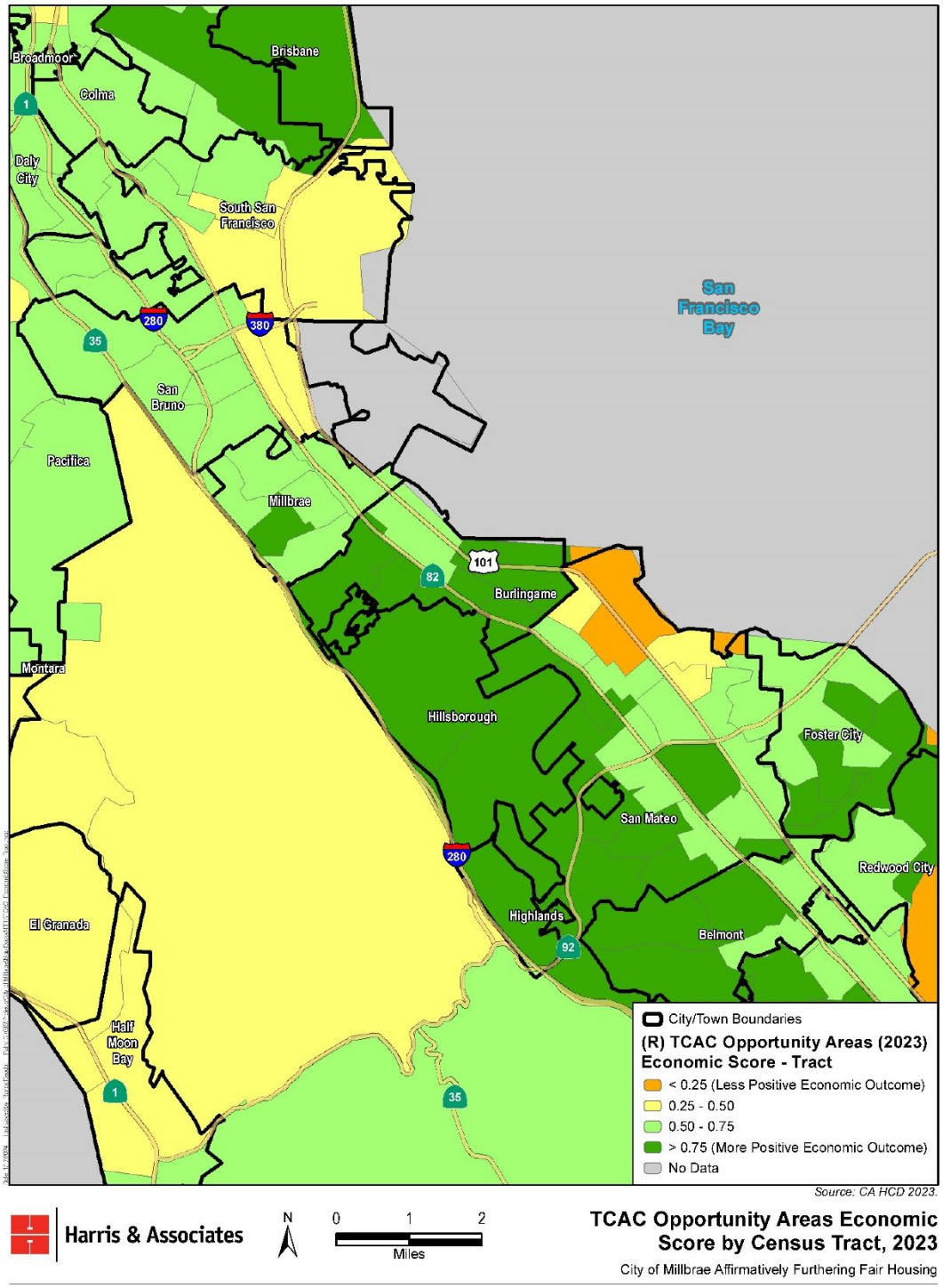


Source: ABAG Housing Needs Data Workbook

TCAC's economic opportunity score is comprised of poverty, adult educational attainment, employment, job proximity, and median home value. Millbrae scores moderately high for economic outcomes according to TCAC (Figure III-9).

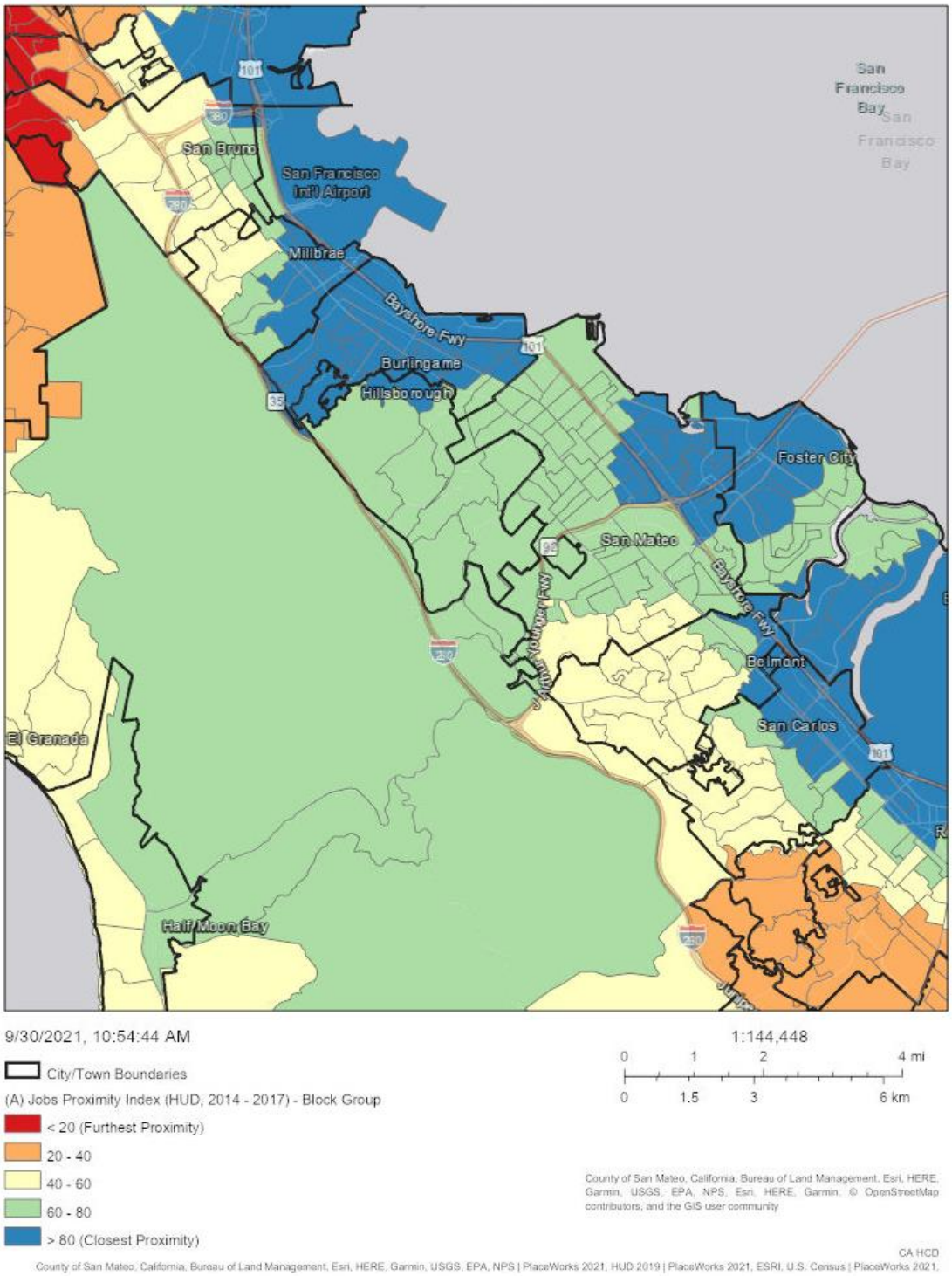
Similarly, HUD's job proximity index shows the **City of Millbrae is starkly divided between the east and west.** Eastern areas of the City have a score of more than 80, whereas western areas score between 40 and 60—on a scale from zero to 100 where 100 is the closest proximity to jobs (Figure III-10). Eastern Millbrae is adjacent to the San Francisco Airport and the City of Burlingame, which has a job-to-household ratio over two—higher than the County average.

Figure III-9. TCAC Opportunity Areas Economic Score by Census Tract, 2023



Source: California Department of Housing and Community Development AFFH Data Viewer

Figure III-10. Jobs Proximity Index by Block Group, 2017



Source: California Department of Housing and Community Development AFFH Data Viewer

Transportation

Millbrae Station is an intermodal transit station serving Bay Area Rapid Transit (BART) and Caltrain. The station is also served by SamTrans bus service, Commute.org and Caltrain shuttle buses, and other shuttles. The Station serves the San Francisco Peninsula and is the largest intermodal station west of the Mississippi.

SamTrans provides bus services in San Mateo County including Redi-Wheels paratransit service. 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. Figure III-11 details SamTrans routes and their proximity to the Site Inventory sites. **Nearly 100% of the sites are within 1/2-mile of a SamTrans stop.**

In 2018, the Metropolitan Transportation Commission (MTC), which covers the entire Bay Area, adopted a coordinated public transit and human services transportation plan. While developing the coordinated plan, the MTC conducted extensive community outreach about transportation within the area. That plan—which was developed by assessing the effectiveness of how well seniors, persons with disabilities, veterans, and people with low incomes are served—was reviewed to determine gaps in services in Millbrae and the County overall. Below is a summary of comments relevant to San Mateo County.

> *"San Mateo's [Paratransit Coordinating Council] PCC and County Health System, as well as the Peninsula Family Service Agency provided feedback. The most common themes expressed had to do with pedestrian and bicycle needs at specific locations throughout the County, though some covered more general comments such as parked cars blocking sidewalk right-of-way and a desire for bike lanes to accommodate motorized scooters and wheelchairs. Transportation information, emerging mobility providers, and transit fares were other common themes.*
>
> *While some comments related to the use of car share, transportation network companies (TNCs), or autonomous vehicles as potential solutions, other comments called for the increased accessibility and affordability of these services in the meantime."*[13]

A partnership between the World Institute on Disability and the MTC created the research and community engagement project TRACS Transportation Resilience, Accessibility & Climate Sustainability). The project's overall goal is to, "stimulate connection and communication between the community of seniors and people with disabilities together with the transportation system–the agencies in the region local to the San Francisco Bay, served by MTC."[14] TRACS highlights that

[13] https://mtc.ca.gov/sites/default/files/MTC_Coordinated_Plan.pdf

[14] https://wid.org/transportation-accessibility/

improving accessibility requires engagement for the community because there are no "watchdog" systems in place to hold agencies accountable.

As part of the TRACS outreach process, respondents were asked to share their compliments or good experiences with MTC transit. One respondent who had used multiple services said, **"I sense that SamTrans is the best Bay Area transit provider in terms of overall disability accommodation."**

The San Mateo County Transit District updated its 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.[15]

MTC also launched Clipper START—an 18-month pilot project— in 2020 which provides fare discounts on single transit rides for riders whose household income is no more than double the federal poverty level.[16]

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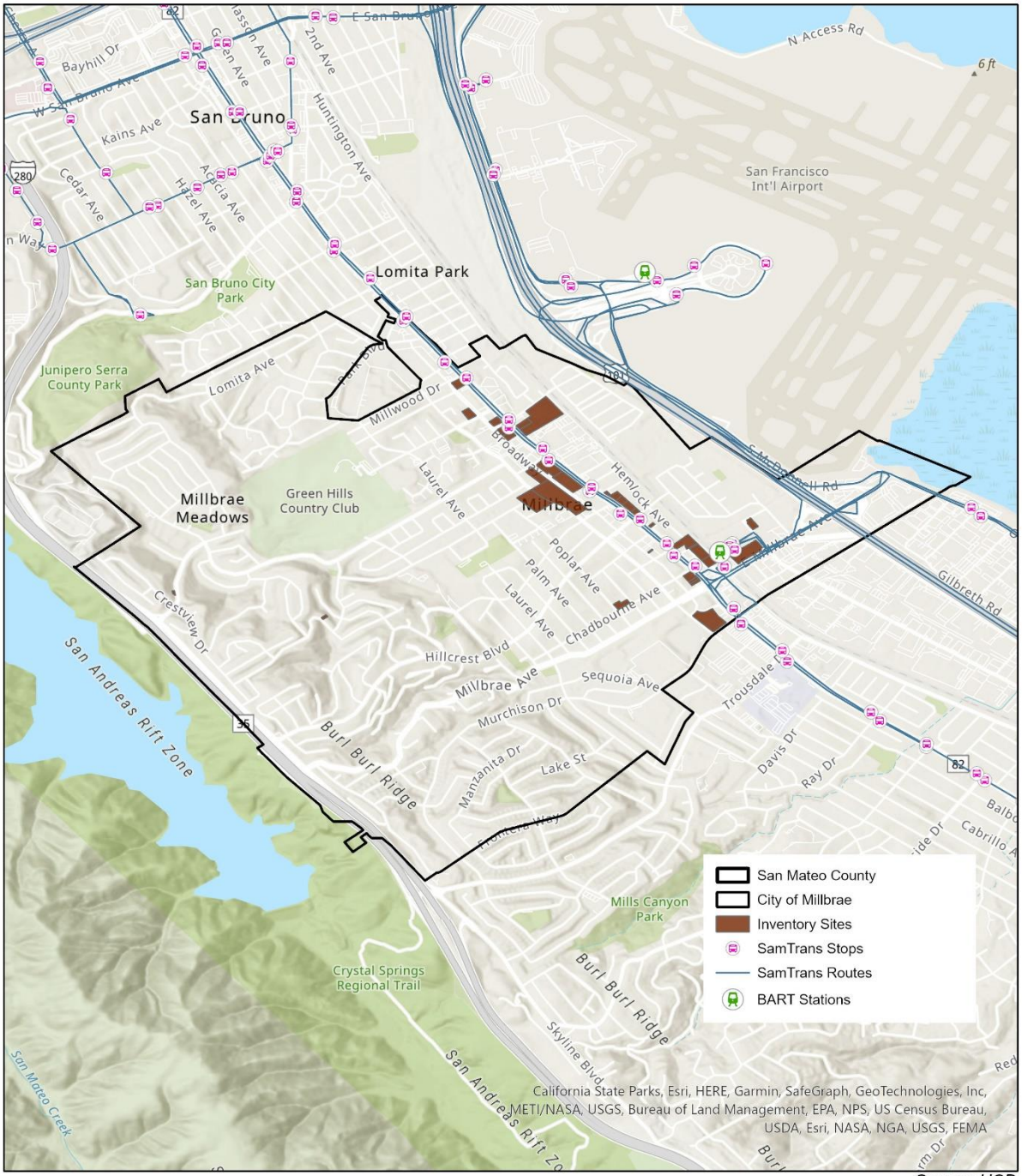
15 https://www.samtrans.com/Planning/Planning_and_Research/Mobility_Plan_for_Older_Adults_and_People_with_Disabilities.html

16 https://mtc.ca.gov/planning/transportation/access-equity-mobility/clipperr-startsm

Figure III-11. SamTrans Routes and Stops with Site Inventory Sites



Source: HCD

Harris & Associates

N

0 0.5 1 Miles

Site Inventory and Transit Proximity

City of Millbrae Affirmatively Furthering Fair Housing

Environmental Quality

TCAC Opportunity Areas Environmental Scores (CalEnviroScreen)

TCAC's opportunity areas environmental scores are based on the CalEnviroScreen 3.0 indicators which include ozone, PM2.5, diesel PM, drinking water, pesticides, toxic release, traffic, cleanup sites, groundwater threats, hazardous waste, impaired water bodies, and solid waste sites. **Overall CalEnviroScreen scores are calculated from the scores for two groups of indicators: Pollution Burden and Population Characteristics. The calculated average scores (average of the indicators) are divided by 10 and rounded to one decimal place for a CalEnviroScreen score ranging from 0.1 – 10. The average scores will then provide a percentile rank for how each tract ranks in comparison to tracts throughout the State. For instance, a 0.85 score indicates that the census tract scores higher than 85% of the tracts in the rest of the State. The higher the CalEnviroScreen score is, the lower the exposure to the pollution characteristics described above.**

The maps below (Figures III-12 through III-15) provide a percentile rank for how each tract in Millbrae ranks throughout the State (1% - 100%).

The City of Millbrae is divided for environmental outcomes. In the eastern areas of the City adjacent to the San Francisco Airport, census tracts have scores less than 0.25. However, in the western areas of the City, scores are greater than 0.5 (Figure III-12, Figure III-13, and Figure III-14). A map showing the location of all sites with an overlay for TCAC Environmental Score data is provided in Figure III - 12. Nearly 100% of sites score low on CalEnviroScreen mainly due to diesel particulate matter from the San Francisco Airport (SFO).

However, most of the sites are located near Millbrae Station, close to transportation and jobs which is consistent with **California's Housing Future: Challenges and Opportunities Final Statewide Housing Assessment 2025 (2025 Assessment),** prepared by the State. More specifically, **the 2025 Assessment emphasizes throughout the document that the location of housing (including affordable housing) near transit and job centers is an important policy and implementation strategy**. Excerpts that highlight this point are provided below along with page number references.

- "Land use policies and planning can help encourage greater supply and affordability as well as influence the type and location of housing. Thoughtful land use policies and planning can translate into the ability for families to access neighborhoods of opportunity, with high-performing schools, greater availability of jobs that afford entry to the middle class, and convenient access to transit and services. Easy access to jobs and amenities reduces a household's daily commute and other travel demands. Encouraging new homes in already developed areas and areas of opportunity not only alleviates the housing crisis but also supports the State's climate change and equity goals" (page 3).

- Housing for persons with disabilities "could greatly benefit from access to transit options" (page 12). ***This was identified as a fair housing finding in this AFFH, therefore housing near transit options is a high priority for the location of sites.***

- The Center for Neighborhood Technology developed the Housing and Transportation Affordability Index shows "lower overall cost burdens aligning with more transit-accessible areas" (page 33).
- "State housing and planning law encourage housing development that also helps the State meet its sustainability goals (developing inward and more compactly, close to jobs, transit, and services), and encourages the development of housing that is affordable to Californians at a range of income levels" (page 36).
- "In urban and suburban areas, compact infill development at increased density is critical for addressing housing needs and using valuable, location-efficient land near transit and job centers" (page 43).

California Healthy Places Index (HPI)

Alternatively, the **City scores high on the California Healthy Places Index (HPI)** developed by the Public Health Alliance of Southern California (PHASC). The HPI includes 25 community characteristics in eight categories including economic, social, education, transportation, neighborhood, housing, clean environment, and healthcare (Figure III-15).[17] A high score on the HPI indicates a high level of healthiness based on the aforementioned variables.

Existing/Current Mitigation Measures Addressing Air Quality

While acknowledging the Health Scores (specifically stemming from diesel particulate matter per CalEnviroScreen) due to the nearby airport, **the City has demonstrated a clear initiative to mitigate these health risks and make them nonfactors for City residents.**

About the environmental issues identified, the City and other regional entities have developed and are implementing numerous mitigation measures related to air quality and the impact related to the San Francisco Airport (SFO).

SFO

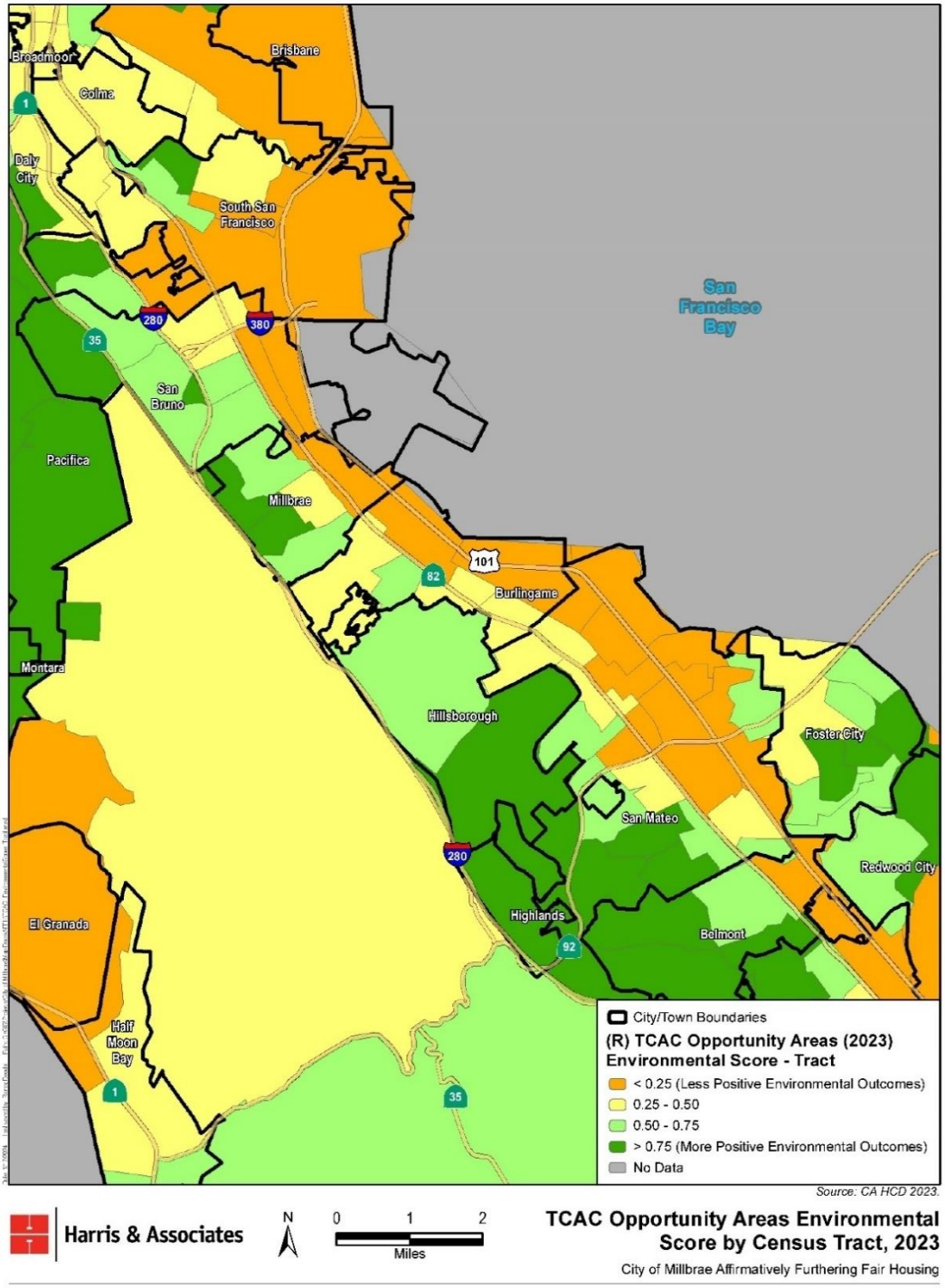
According to the SFO website, SFO implements the following to mitigate and manage emissions locally to improve air quality:

- SFO has developed a comprehensive greenhouse gas (GHG) emissions reduction program to meet the City and County of San Francisco's goal of reducing GHG emissions to 40% below 1990 levels by 2025. SFO is firmly committed to meeting this goal, having reduced its GHG emission level to 34% below 1990 emission levels in FY 2012. The following is part of this program:
    - Initiatives to enhance the Airport's energy efficiency, as well as increase its use of renewable energy and clean fuels- in addition to decreasing its directly controlled

[17] https://healthyplacesindex.org/about/

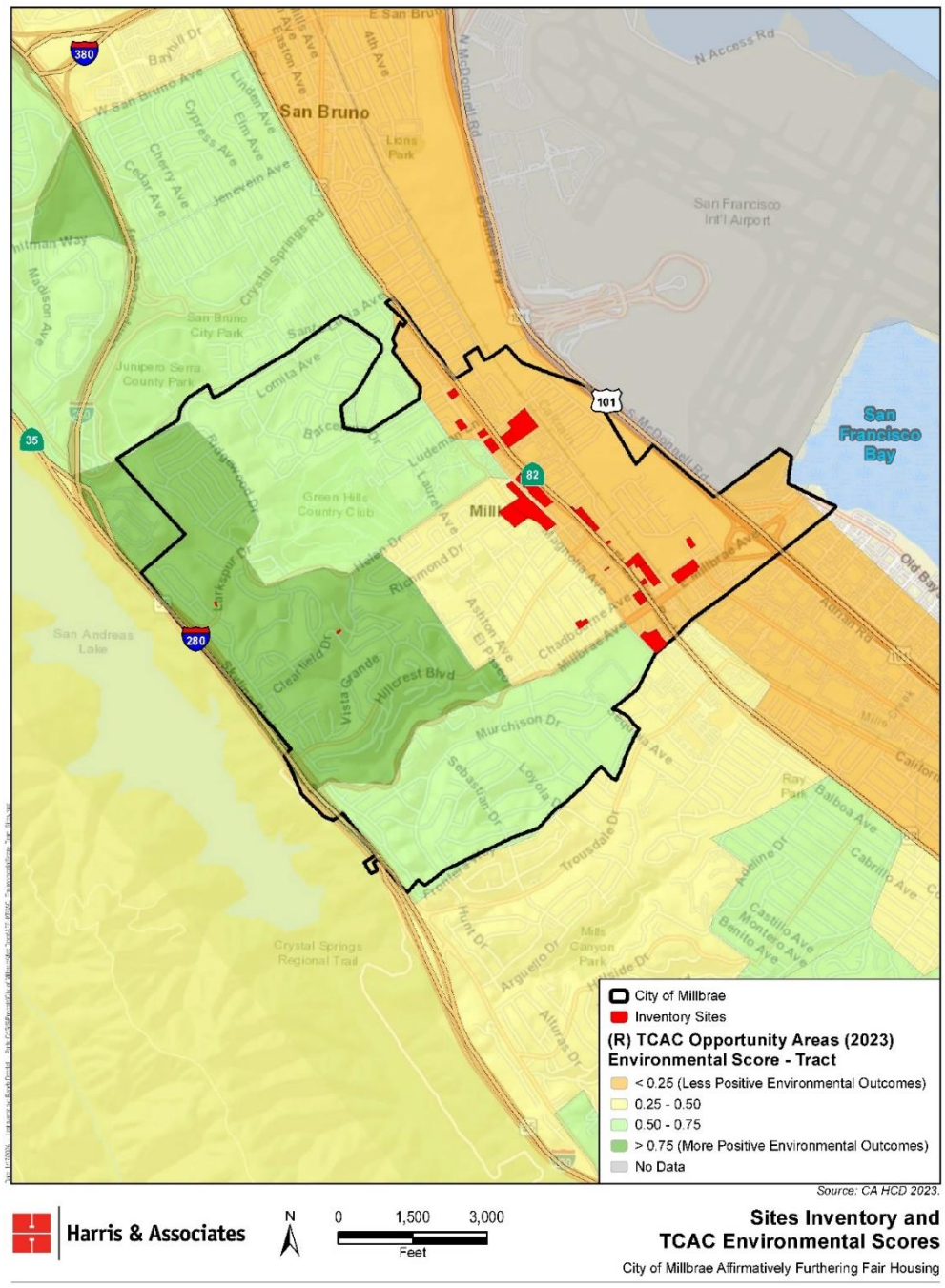
emissions, SFO has implemented several voluntary GHG mitigation measures that reduced the emissions from SFO enterprises by 69,775 metric tons in FY 2012. SFO also offset the baseline GHG emissions by 2,948 metric tons in FY 2012.

Figure III-12. TCAC Opportunity Areas Environmental Score by Census Tract, 2023



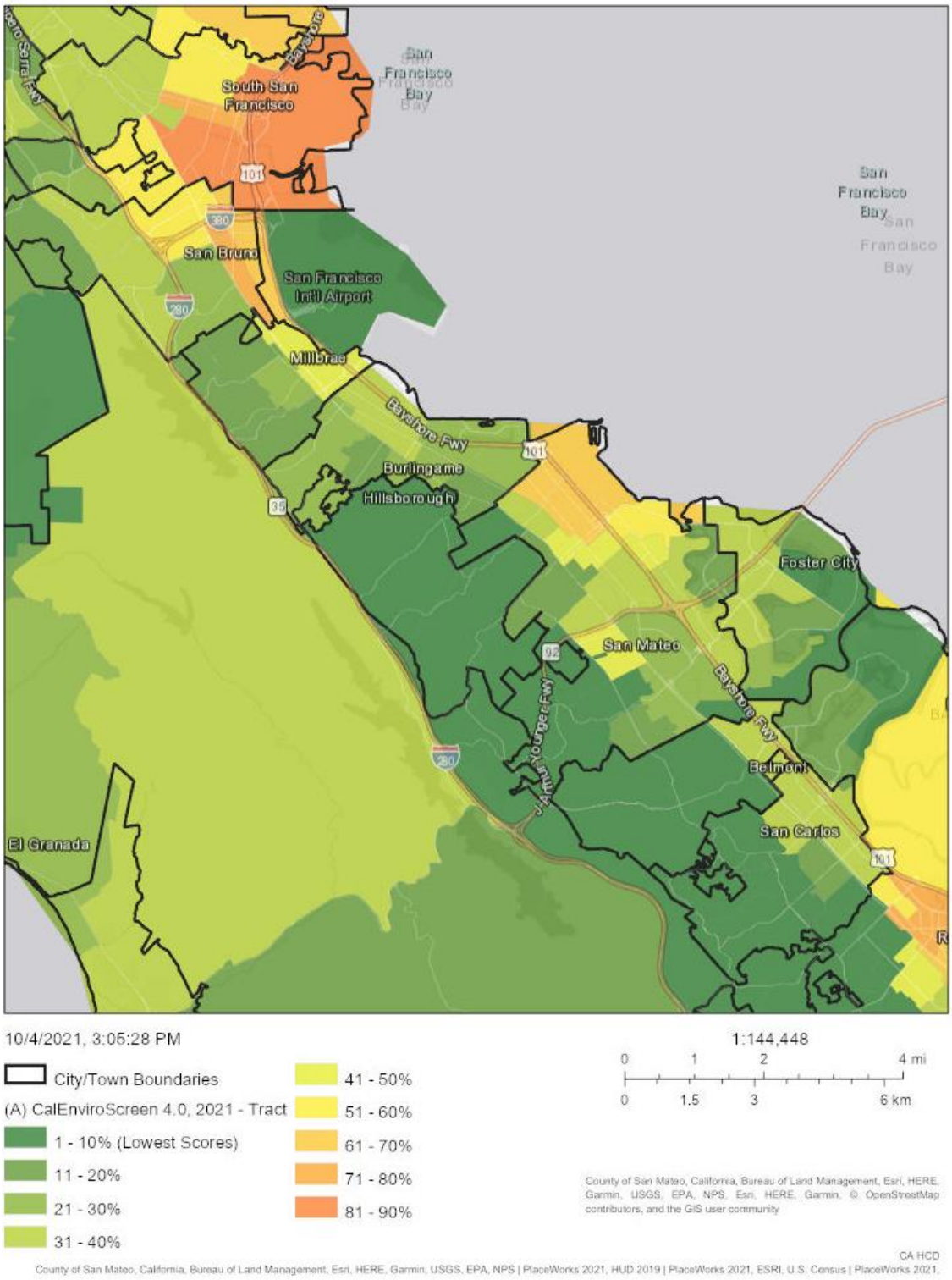
Source: California Department of Housing and Community Development AFFH Data Viewer

Figure III-13. TCAC Opportunity Areas Environmental Score with Sites by Census Tract, 2023



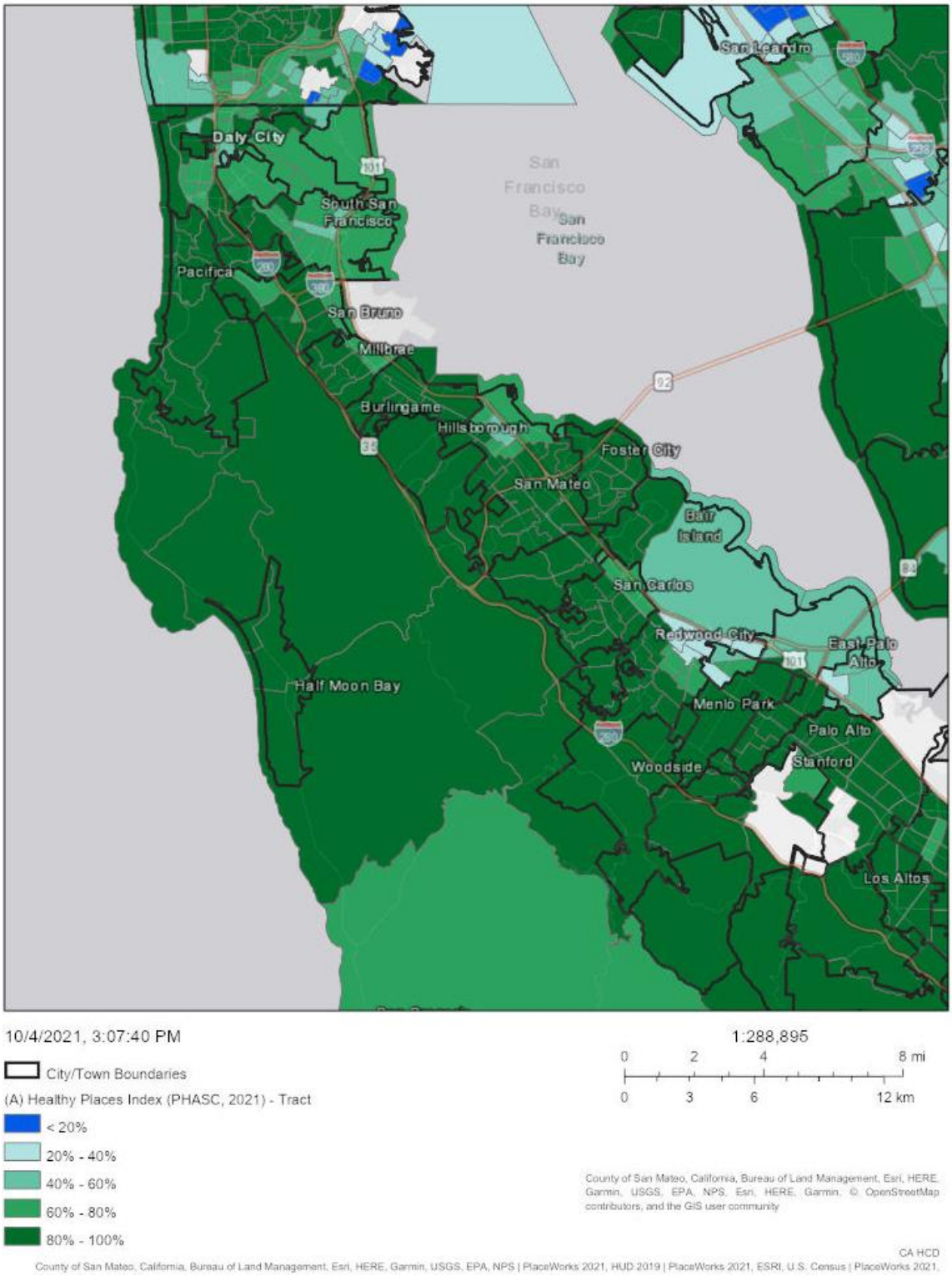
Source: California Department of Housing and Community Development AFFH Data Viewer

Figure III-14. CalEnviroScreen by Census Tract, 2021



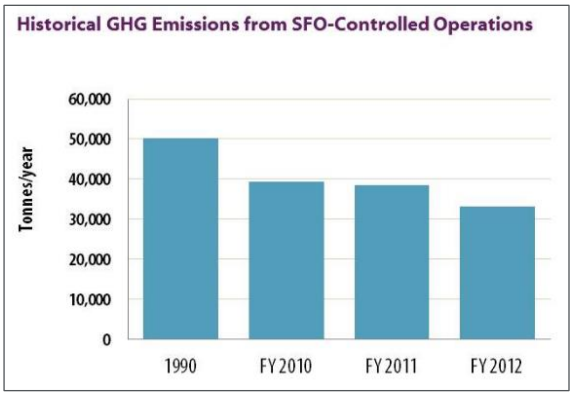
Source: California Department of Housing and Community Development AFFH Data Viewer

Figure III-15. Healthy Places Index by Census Tract, 2021



Source: California Department of Housing and Community Development AFFH Data Viewer

- Historical GHG Emissions from SFO-Controlled Operations – the graphic above shows SFO-controlled GHG emissions for 1990, and FY 2010 through FY 2012. **The Airport has reduced its emission level to 34% below the 1990 emission level.**



- Title 5 Permit – As a major facility, SFO monitors emissions and makes regular reports to the Bay Area Air Quality Management Board (BAAQMD) to ensure compliance with federal, State, and local air quality requirements.
- Climate Action Plan – SFO manages greenhouse gas emissions (GHG) as part of its Strategic Plan – targeting 50% GHG emissions reduction by 2021 (from a 1990 baseline)– and annual Climate Action Plan. Through these activities, such as building and transportation electrification, **SFO is working to slow climate change and improve air quality, through the co-reduction of fine particulate matter (PM2.5) and more**.
- Annual Reporting – SFO prepares Plans and Reports that document our Airport's progress in achieving key outcomes for our environment, workforce, and community, including those that emphasize work in air quality and health.
- Airport Development Plan (2016) - includes strategic initiatives to upgrade the existing utility infrastructure to be more environmentally efficient and resilient to climate change. These initiatives include the SFO Sustainability and Zero Impact Objective Policies, SFO Climate Action Plan, and Carbon Neutrality Initiatives.
- The Comprehensive Airport Land Use Compatibility Plan for the Environs of the San Francisco International Airport (2012) - details multiple programs to, "protect the public health, safety, and welfare by the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around public airports…" These programs include:
    - Local Pressures – Modifications to the BART and Caltrain station areas that are expected to improve service and ridership represent a large public investment in transit. There is a desire and a need for transit-oriented development (TOD) and redevelopment near the stations to make the most of the public investment. TOD also helps meet other regional and smart growth goals such as the reduction of vehicle miles traveled and improved air quality.
    - City and County Association of Governments of San Mateo County (C/CAG) to use Congestion Mitigation and Air Quality (CMAQ) Funds for programs including the Transportation for Livable Communities (TLC) Program.

City's Climate Action Plan

Millbrae's Climate Action Plan (2020) also details several updates to its efforts to reduce greenhouse gas emissions specifically citing emissions from the nearby airport. The Plan contains programs to mitigate and reduce greenhouse gas emissions to improve air quality and community health, including the following:

- Taking inventory of GHG emissions following (BAAQMD GHG Plan Level Quantification Guidance (dated May 2012), as well as the Local Government Operations Protocol.
- **Sustainable Communities Strategy/Regional Transportation Plan** - City and C/CAG are collaborating with local governments in San Mateo County as well as regional agencies to develop a Sustainable Communities Strategy (SCS) in compliance with the requirements of Senate Bill 375. The SCS will facilitate more focused development in priority development areas near public transit stations. The San Mateo County SCS aims to better integrate land use with public transportation to reduce GHG emissions. Issues monitored by C/CAG include transportation, air quality, stormwater runoff, hazardous waste, solid waste and recycling, climate change, land use near airports, abandoned vehicle abatement, and issues that affect the quality of life in general. C/CAG supports several initiatives including the following:
    - San Mateo County Energy Watch
    - Climate Ready San Mateo County
    - Congestion Management Agency
    - Sustainable Communities Strategy/Regional Transportation Plan.
- Specific plans (Millbrae Station and Downtown El Camino Real Corridor specific plans) surrounding and including the Millbrae Station transportation hub to reduce car use.
- Public Employee Commuting Program
- Clean Fleet Policy (city-owned vehicles)

Millbrae 2040 General Plan Update

The City's General Plan Update (in the process) contains the following programs aimed at improving air quality by providing expanded public transportation options.

Transportation Demand Management

Transportation Demand Management (TDM) is a term that broadly covers programs designed to reduce traffic congestion and improve air quality by offering a combination of incentives and market-based measures to increase the use of alternative modes of transportation among employees and residents. TDM programs include a variety of strategies ranging from financial incentives, promoting carpool and vanpool usage, supporting telecommuting, and providing informational and promotional activities. TDM programs are typically implemented at the local level by the City, major employers, developers, and larger public and private institutions.

The City of Millbrae participates in Commute.org, a joint powers authority comprised of 17 cities and towns, as well as the County of San Mateo. Commute.org provides several programs and services that support TDM in Millbrae.

TDM strategies and programs that the City can implement to reduce congestion, vehicle miles traveled, and parking demand. For a primarily urban city where opportunities to widen intersections and roadways to accommodate future growth are limited, TDM strategies and programs provide another option to address the transportation needs of residents, visitors, and employees. The overall goal of the TDM is to implement transportation demand management strategies and programs to reduce vehicle miles traveled, traffic congestion, and parking demand.

- Countywide TDM Programs Participation - The city shall continue to participate in countywide TDM programs to assist employers and employees in reducing the use of single-occupancy vehicles and promoting and incentivizing the use of transit, active transportation (i.e., non-motorized transportation), and carpooling/vanpooling.

- San Mateo County Congestion Management Program - the City, in coordination with C/CAG, is the designated Congestion Management Agency for the County, shall implement the County Congestion Management Program and the Land Use Impact Analysis Program, otherwise known as the Transportation Demand Management (TDM Policy). The TDM Policy establishes project review thresholds, vehicle trip reduction, and mode share targets, monitoring, and reporting requirements, and TDM measures.

- Bay Area Commuter Benefits Program - the City shall continue to support the Bay Area Commuter Benefits Program, to improve air quality, reduce emissions of greenhouse gases and other air pollutants, and decrease traffic congestion in the Bay Area by encouraging employees to commute by transit, carpooling, biking, and other alternative modes.
- Car Sharing - the City shall explore opportunities to partner with car-sharing companies to establish designated car-sharing spaces and vehicles in the City, and the City shall explore opportunities for car-sharing companies to occupy any required parking spaces on private property provided the cars are made available to the general public.
- Electric Transportation Network Company Vehicles - the City shall encourage the use of EV Transportation Network Company Vehicles (TNCs) in the community.

Natural Resources Conservation Element (General Plan)

The City's General Plan Update includes an updated Natural Resources Conservation Element. An important goal of this Element is NC-4, Reduce Emissions of Criteria Air Pollutants and Reduce Exposure to Toxic Air Contaminants and Fine Particulate Matter to Improve Regional Air Quality and Protect the Health of Millbrae Residents. The City has five policies/programs/actions assigned to this goal including the following:

- Ambient Air Quality Standards - continue to work with the California Air Resources Board and the Bay Area Air Quality Management District (BAAQMD) to meet State and Federal ambient air quality standards.

- Reduce Construction and Operational Emissions - require new development projects to incorporate design or operational features that reduce construction and operational emissions of reactive organic gases (ROG), nitrogen oxides (NOX), and particulate matter (PM10 and PM2.5) to less than significant level.

- Minimize Sensitive Receptor Exposure - work with BAAQMD to evaluate the exposure of sensitive receptors to odors, toxic air contaminants (TAC), and fine particulate matter (PM2.5). The City shall also require new development to implement applicable best management practices that will limit exposure of new sensitive receptors to a less than significant level (e.g., daycare facilities, elderly housing, and convalescent facilities).

- Preferences for Reduced-Emission Equipment - give preference to contractors using reduced-emission equipment for City construction projects and contracts for services (e.g., garbage collection), as well as businesses that practice sustainable operations.

- Air Pollution Education - continue to work with the BAAQMD to educate residents about the health effects of air pollution and continue to support and promote the BAAQMD's Spare the Air Day alerts program to inform residents about actions they can take to help improve air quality and reduce GHG emissions, including replacing wood burning fireplaces and stoves with cleaner alternatives.

Millbrae Active Transportation Plan

The Active Transportation Plan was approved by the City Council on October 12, 2021. The Plan is intended to achieve the mobility, environmental, and health benefits of bicycling and walking, from both a recreation and transportation standpoint.

The Plan's multiple elements address the City's existing bicycle and pedestrian conditions, the City's needs, goals, and policies to support a robust and comfortable active transportation network, additional recommendations at key locations, and implementation strategies for the proposed Plan.

The Plan includes the development of paths to key bicycle and pedestrian destinations identified by the City, including the Downtown Core, the El Camino Real Commercial Corridor, local and regional transit facilities, and area schools, parks, and recreational trails.

In addition, proposed sidewalk, crosswalk, and bicycle projects listed in the Plan are included as recommendations that would serve to connect neighborhoods and key destinations for bicyclists of all ages and abilities. These include a freeway overcrossing, connections between existing bicycle and pedestrian routes, and safety and comfort upgrades at signalized intersections and

crosswalks. The Plan would also include the construction of two new alignments through Lions Park in the northern portion of the City and Josephine Waugh Soroptomist Park in the southern portion of the City.

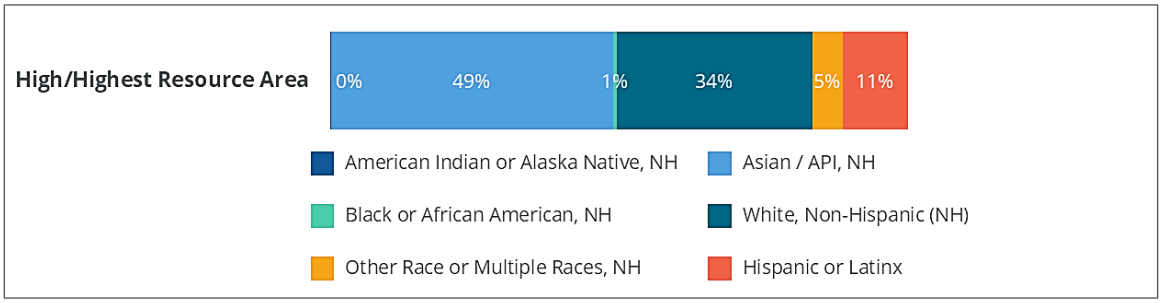
Adoption of the proposed Plan would set in place a long-term program, concurrent with the City of Millbrae's 2040 General Plan, for the future construction of the projects; however, adoption in itself would not directly involve the construction of such projects. Construction of the proposed Plan would occur primarily on existing public rights-of-way within the City.

Programs HIP-16 and HIP-42 in the Housing Plan are focused on implementing the development of housing (including affordable housing) near transit options to lower vehicle miles traveled and ultimately improve air quality in the City.

Disparities in access to opportunity

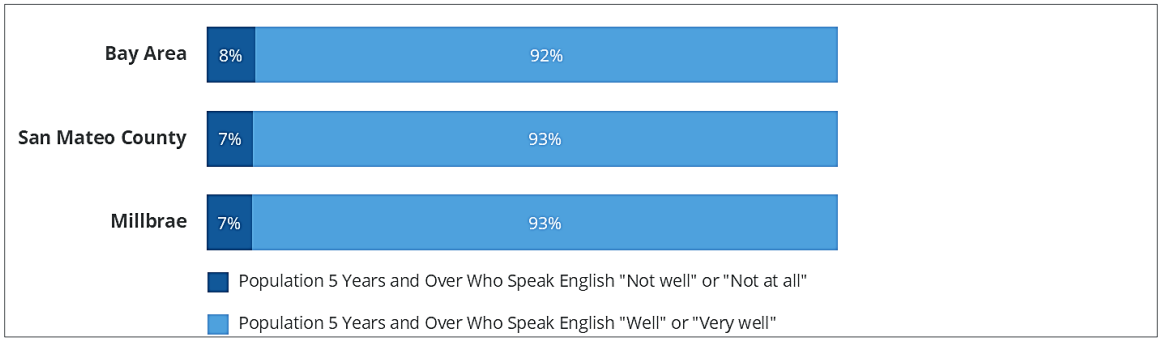
TCAC's composite opportunity score in 2021 shows the **entire City of Millbrae within the high or highest resource areas in the County**—with east areas of the City scoring the highest (Figure III-16, Figure III-17, and Figure III-18). In 2022, the eastern area of Millbrae—east of Magnolia Avenue—was recategorized as a moderate resource area. The share of the population with Limited English Proficiency (LEP) is 7% compared to 7% in the County (Figure III-17).

Figure III-16. Population Living in Moderate and High Resource Ares by Race and Ethnicity, City of Millbrae, 2019



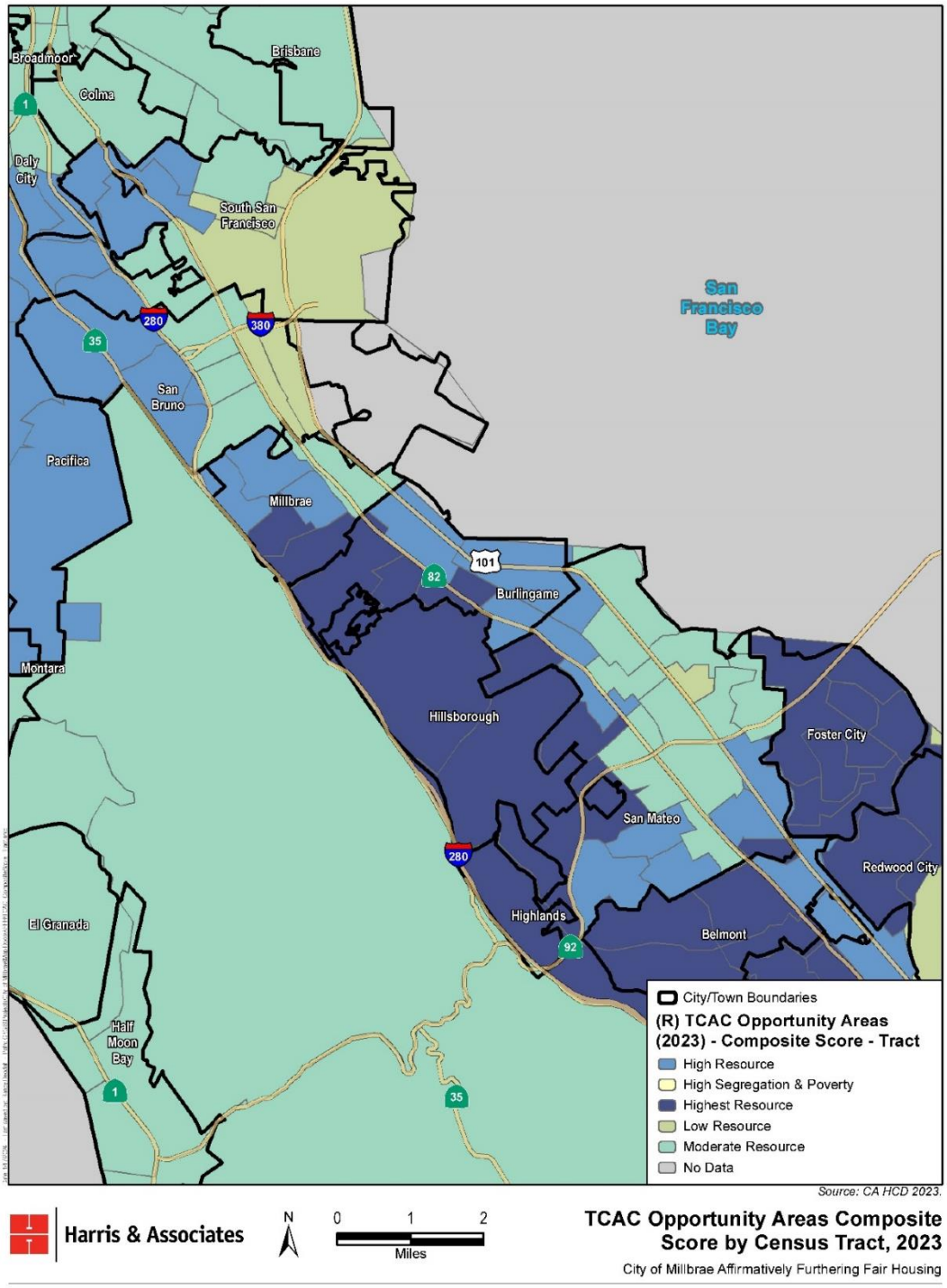
Source: ABAG Housing Needs Data Workbook

Figure III-17. Population with Limited English Proficiency, City of Millbrae, 2019



Source: ABAG Housing Needs Data Workbook

Figure III-18. TCAC Opportunity Areas Composite Score by Census Tract, 2023



Source: California Department of Housing and Community Development AFFH Data Viewer

The Social Vulnerability Index (SVI) provided by the CDC—ranks census tracts based on their ability to respond to a disaster—and includes four themes socioeconomic status, household

composition, race or ethnicity, and housing and transportation. The east areas of Millbrae, adjacent to Burlingame, are categorized as a moderate vulnerability in the SVI, and the remainder of the City has lower vulnerability (Figure III-19). Nearly 100% of the Site Inventory sites are located in these lower to moderate vulnerability areas.

The City of Millbrae does not have any disadvantaged communities. As defined under SB 535, "disadvantaged communities are defined as the top 25% scoring areas from CalEnviroScreen along with other areas with high amounts of pollution and low populations"[18] (Figure III-20).

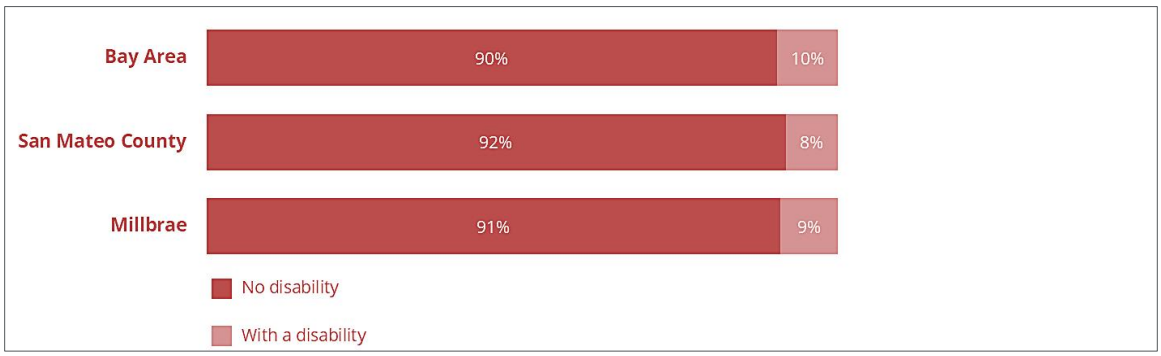
Disparities specific to the population living with a disability

Within the population in the City of Millbrae, 9% are living with at least one disability, compared to 8% in the County (Figure III-21). The most common disabilities in the City are ambulatory (5.3%), independent living (4.4%), and cognitive (2.6%) (Figure III-22). **The population in the City is consistent with the County and the Bay Area.**

Disability

"Disability types include hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty."

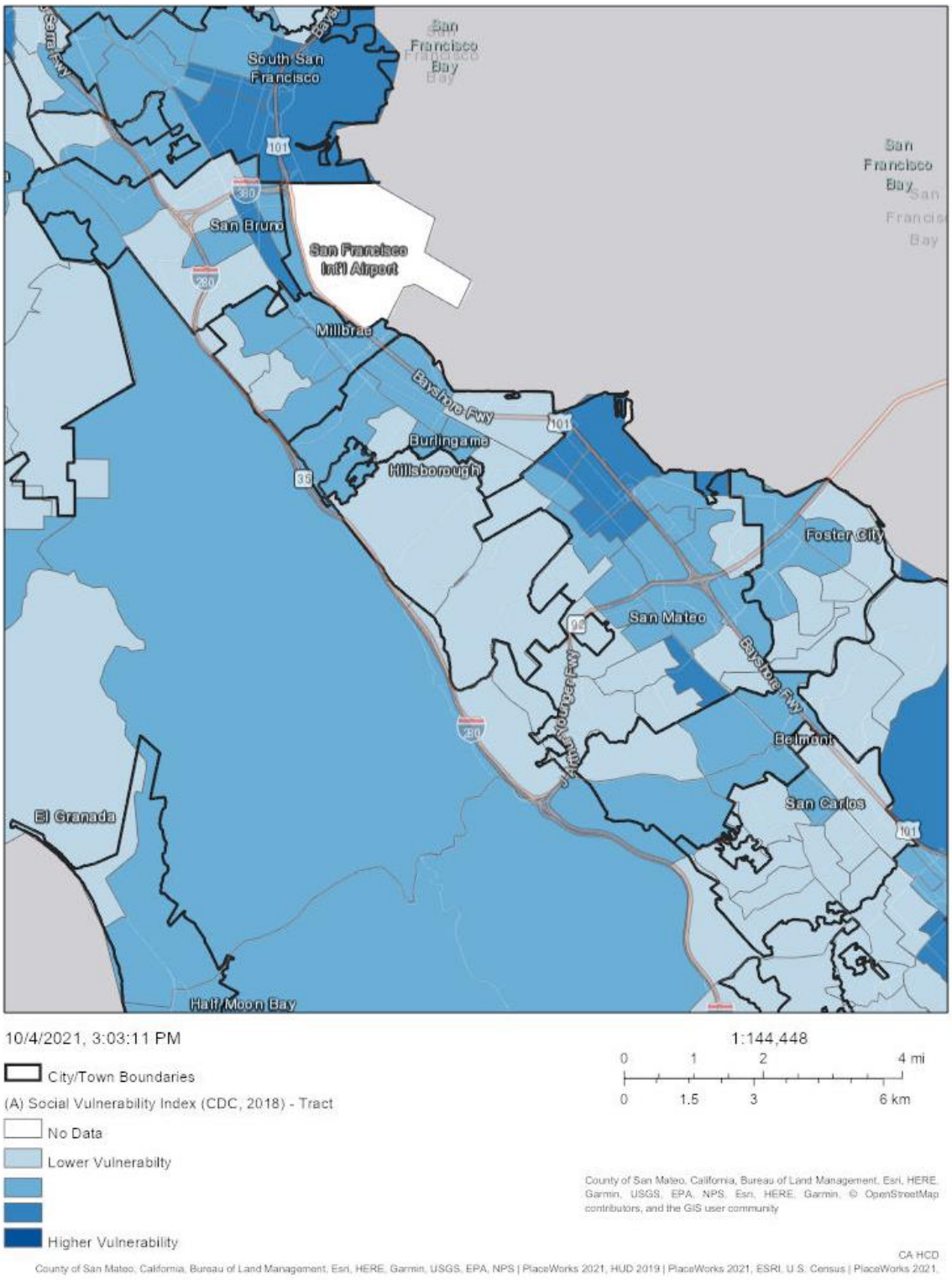
Figure III-21. Population by Disability Status, City of Millbrae, 2019



Source: ABAG Housing Needs Data Workbook

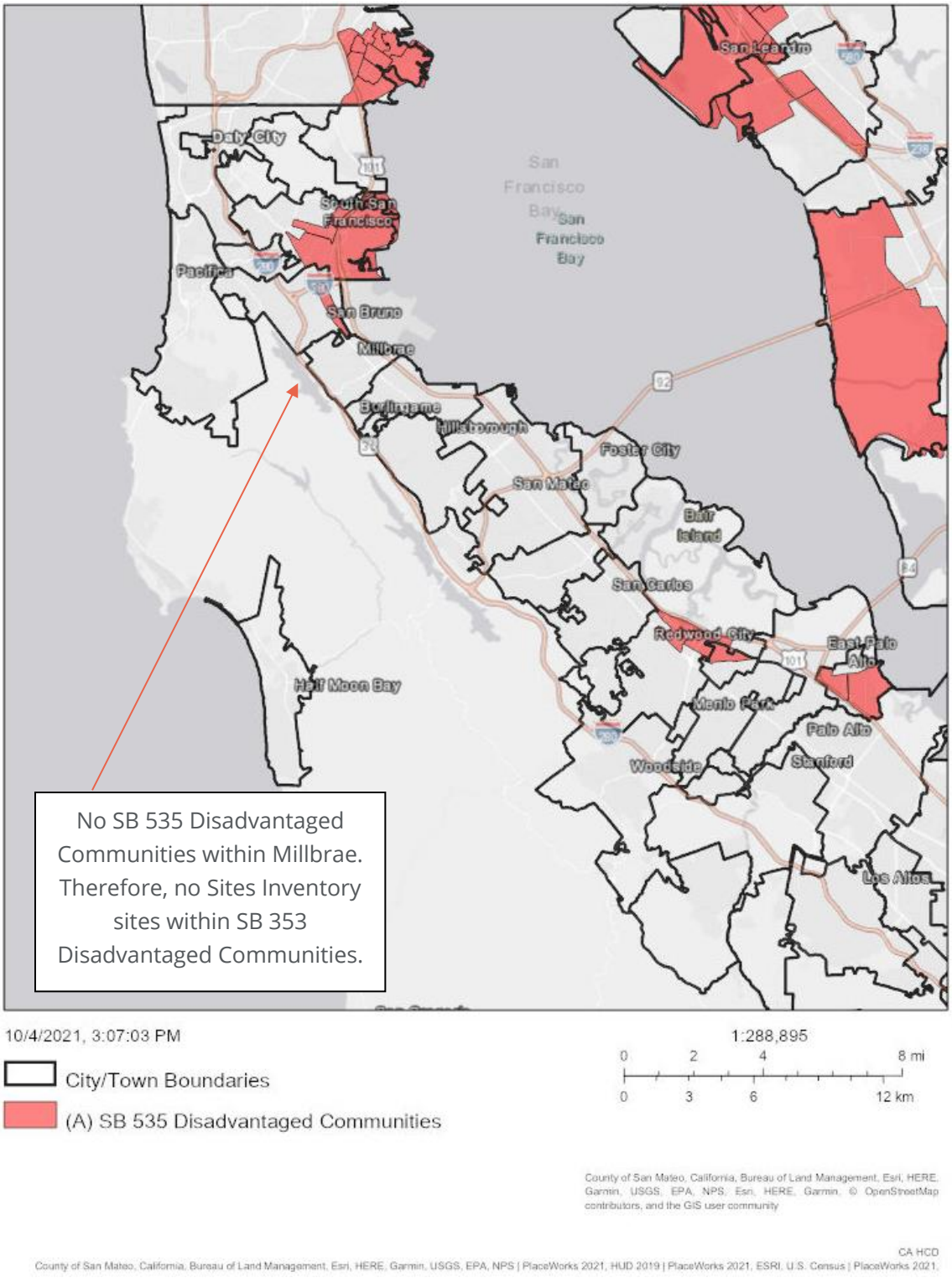
[18] https://oehha.ca.gov/calenviroscreen/sb535

Figure III-19. Social Vulnerability Index by Census Tract, 2018



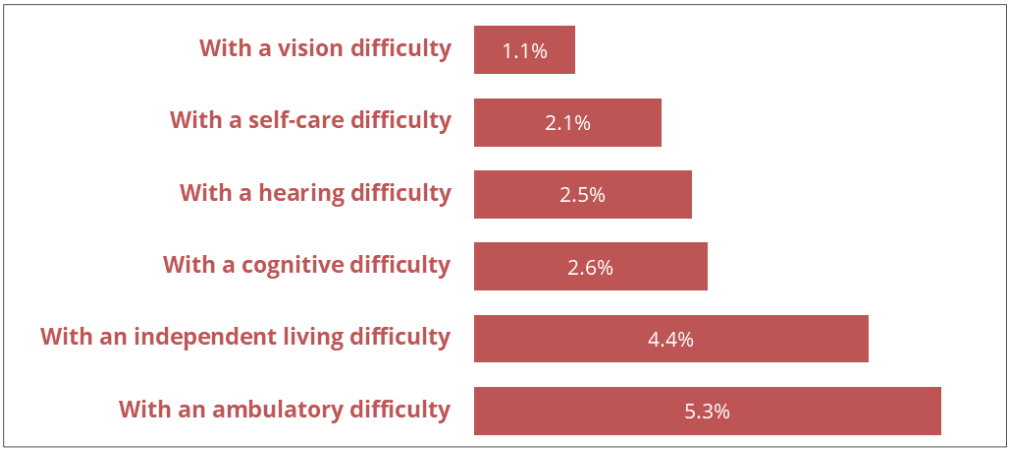
Source: California Department of Housing and Community Development AFFH Data Viewer

Figure III-20. SB 535 Disadvantaged Communities



Source: California Department of Housing and Community Development AFFH Data Viewer

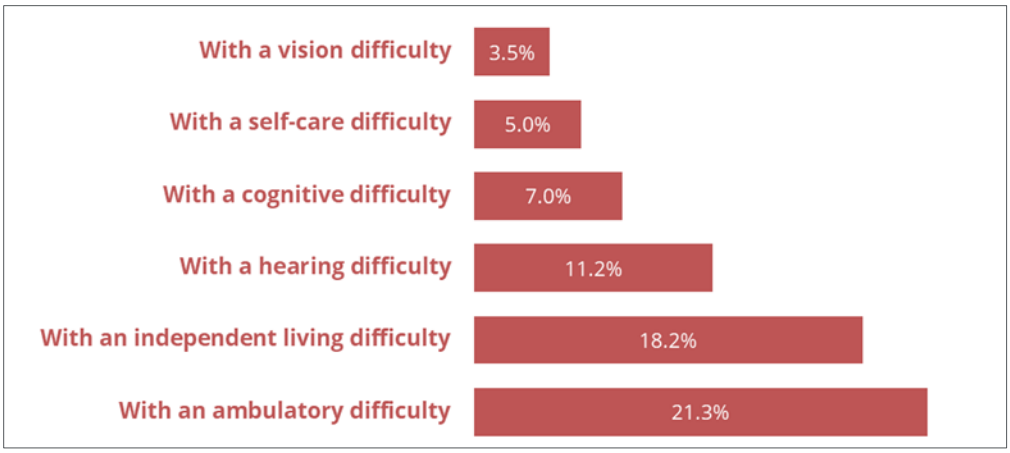
Figure III-22. Disability by Type for the Non-Institutionalized Population 18 Years and Over, City of Millbrae, 2019



Source: ABAG Housing Needs Data Workbook

For the population 65 and over in the City, the share of the population with an ambulatory or independent living difficulty increases (Figure III-23). As mentioned above under access to transportation, San Mateo County is rapidly aging, therefore this population with a disability is likely to increase.

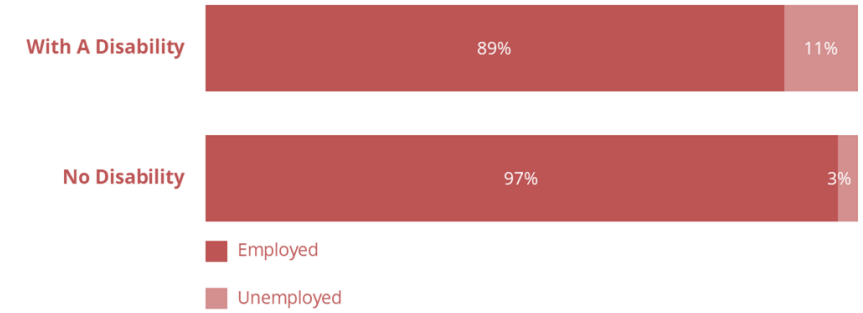
Figure III-23. Disability by Type for Seniors (65 years and over), City of Millbrae, 2019



Source: ABAG Housing Needs Data Workbook

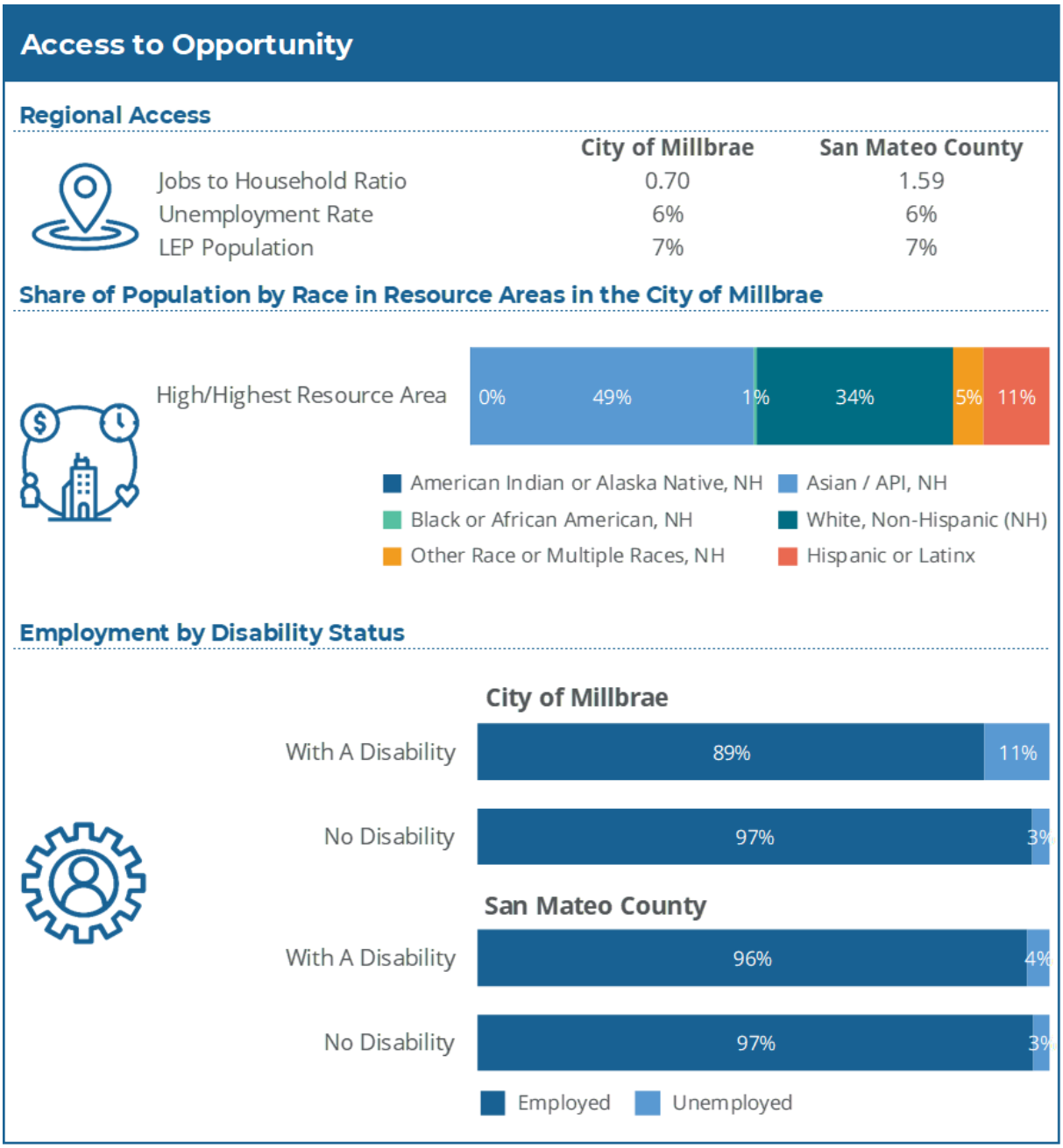
Unemployment is disproportionately high among residents living with a disability at 11% compared to 3% for residents without a disability in the City of Millbrae—particularly when compared to the County (Figure III-24 and Figure III-25). High unemployment rates among this population points to a need for increased services and resources to connect this population with employment opportunities.

Figure III-24. Employment by Disability Status, City of Millbrae, 2019



Source: ABAG Housing Needs Data Workbook

Figure III-25. Access to Opportunity



SECTION IV. Disparate Housing Needs

This section discusses disparate housing needs for protected classes including cost burden and severe cost burden, overcrowding, substandard housing conditions, homelessness, displacement, and other considerations.

Disproportionate Housing Needs

"Disproportionate housing needs generally refers to a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing need when compared to the proportion of members of any other relevant groups, or the total population experiencing that category of housing need in the applicable geographic area. For purposes of this definition, categories of housing need are based on such factors as a cost burden and severe cost burden, overcrowding, homelessness, and substandard housing conditions."

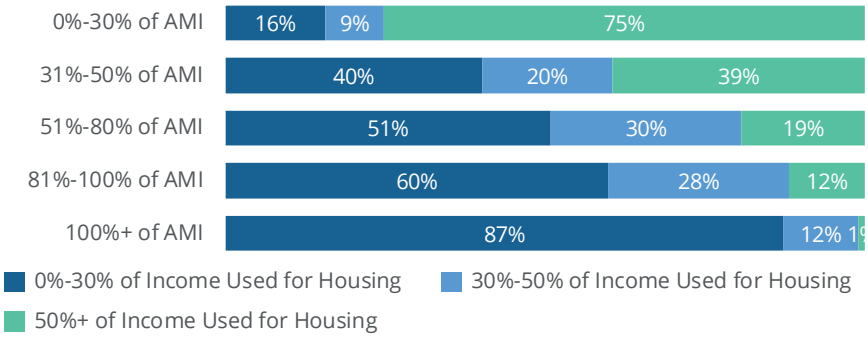
Source: California Department of Housing and Community Development Guidance, 2021, page 39.

A visual summary of disparate housing needs in the City as compared to the County is provided below (Figure IV-1).

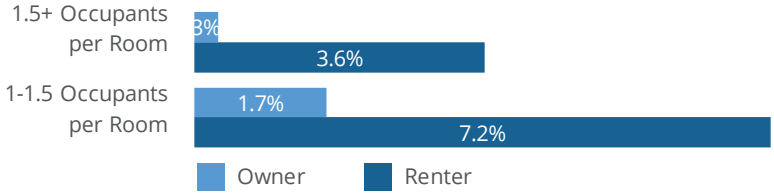
Figure IV-1. Disproportionate Housing Needs

Disproportionate Housing Needs

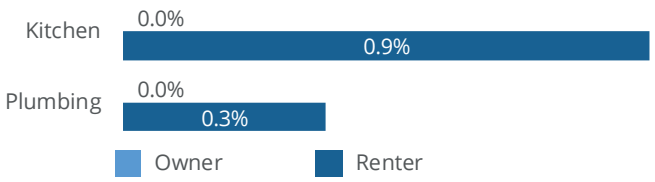
Cost Burden, City of Millbrae, 2019



Overcrowding, City of Millbrae, 2019



Substandard Housing, City of Millbrae, 2019



Homelessness, San Mateo County, 2019

Race and Ethnicity	Share of Homeless Population	Share of Overall Population
American Indian or Alaska Native	6%	0%
Asian / API	6%	30%
Black or African American	13%	2%
White	67%	51%
Other Race or Multiple Races	8%	17%

Displacement, 2020

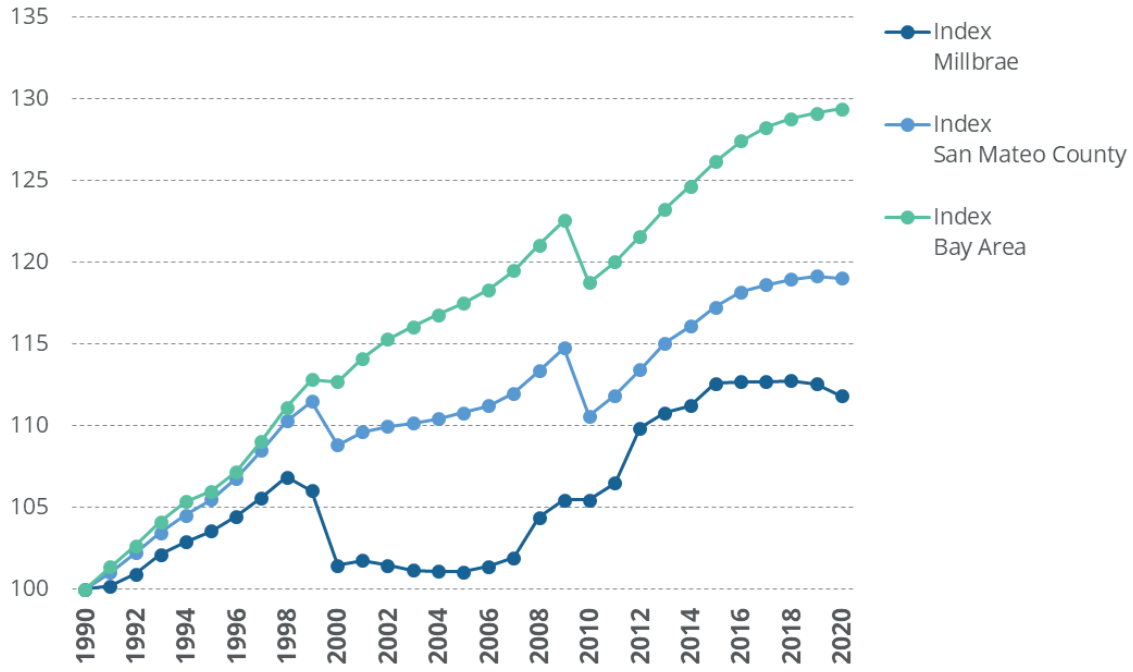
Assisted Units at High or Very High Risk of Displacement	City of Millbrae	San Mateo County
Number of Units	0	417
% of Assisted Units	**0%**	**8%**

Housing needs

Population growth in the City of Millbrae has lagged behind the County and the rest of the Bay Areas since the early 2000s. Similar to the County, Millbrae lost population at the start of the COVID-19 Pandemic. Otherwise, the City has experienced stagnant growth in recent years (Figure IV-2).

According to HCD, 447 building permits for housing units were issued by the City between 2015 and 2021. **Of this total, 312 were for above moderate-income units, 32 moderate-income units, 66 low-income units, and 37 very low-income units (see Chapter 2, Table 2-5).**

Figure IV-2. Population Indexed to 1990



Source: ABAG Housing Needs Data Workbook

For the 2015 to 2023 RHNA period, Millbrae was allocated 663 units of housing with 406 required to be restricted as affordable, and 257 at market rate with no income restrictions. The Table below illustrates the City's status for meeting the RHNA target—specifically, the number of building permits that have been issued for each income category.

In April 2021, the City issued permits for an 80-unit affordable housing project. The CORE project will add 24 units of Very Low-income, 55 units of Low-income, and one Moderate-income unit of housing for an on-site manager. The project will provide priority of the units to qualified United States Armed Forces veterans.

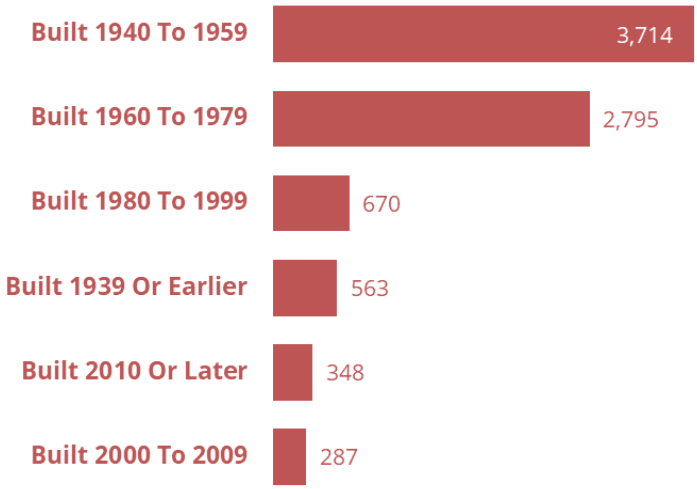
The City has been actively working to increase housing production. As of June 2022, the City has a total of 1,159 units with either approved planning applications or pending building permits. Of

these 1,159 units, a total of 45 are required to be deed-restricted as affordable to very low-income households, 49 to low-income households, and 24 to moderate-income households. The remaining 1,033 units will be at the above-moderate level. Additionally, the City is currently processing planning entitlement applications for a total of 149 units. This includes 52 low-income units and 97 above-moderate units.

The majority of the housing inventory in the City of Millbrae was constructed before 1980 (Figure IV-4). As such, the City's units are older, lack energy efficiency, could be costly to adapt for disability accessibility, and may have deferred maintenance if households cannot afford to make improvements.

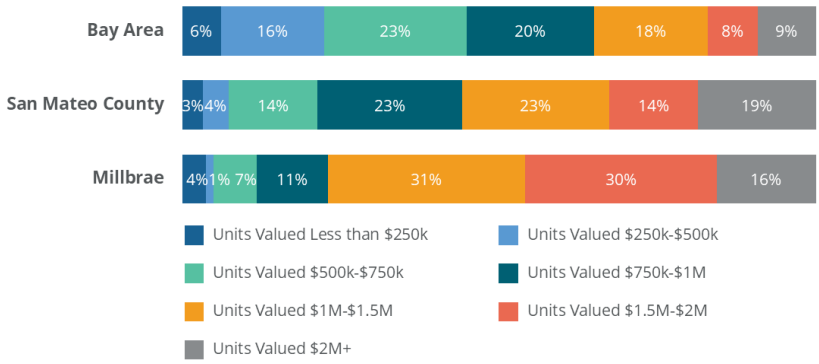
Figure IV-4. Housing Units by Year Built, City of Millbrae

Source: ABAG Housing Needs Data Workbook



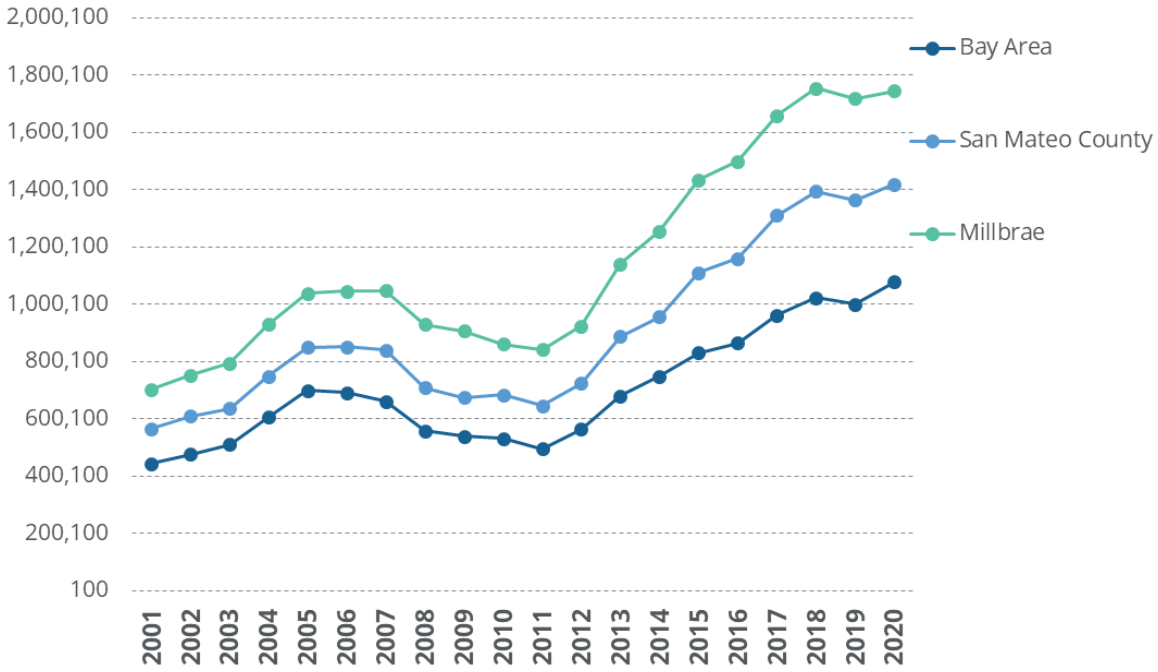
Owner-occupied units are generally valued higher in the City—77% of units are priced over $1 million in Millbrae compared to 56% in the County (Figure IV-5). **Homeownership in Millbrae is largely unattainable compared to other communities in the County**. According to the Zillow home value index, prices increased from $860,312 in 2010 to $1,744,268 in 2020 in the City of Millbrae (Figure IV-6).

Figure IV-5. Distribution of Home Value for Owner-Occupied Units, 2019



Source: ABAG Housing Needs Data Workbook

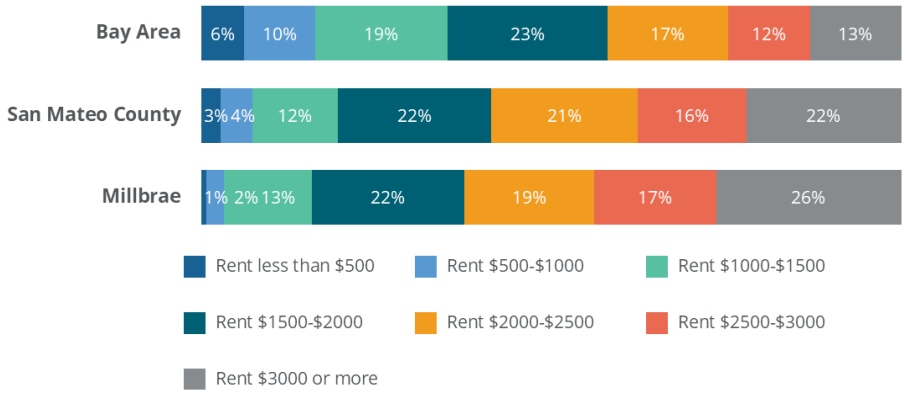
Figure IV-6. Zillow Home Value Index, 2001-2020



Source: ABAG Housing Needs Data Workbook

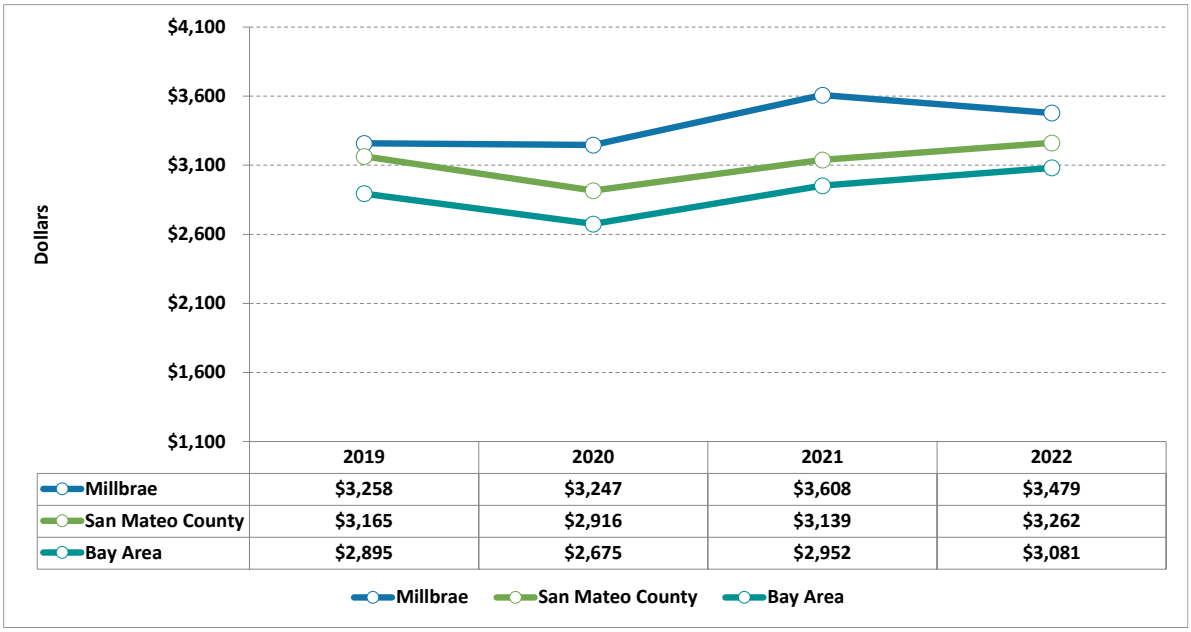
Millbrae has a similar rent distribution compared to the County, although there is a smaller share of units priced below $1,000 per month in the City (Figure IV-7). However, rents in Millbrae are generally higher than median rents in San Mateo County and the Bay Area (Figure IV-8).

Figure IV-7. Distribution of Contract Rents for Renter Occupied Units, 2019



Source: ABAG Housing Needs Data Workbook

Figure IV-8. Median Contract Rent, Zillow (2019-2022)



	2019	2020	2021	2022
Millbrae	$3,258	$3,247	$3,608	$3,479
San Mateo County	$3,165	$2,916	$3,139	$3,262
Bay Area	$2,895	$2,675	$2,952	$3,081

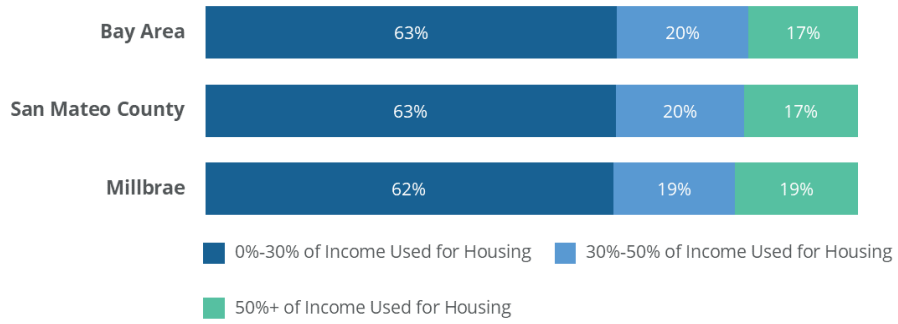
Source: ABAG Housing Needs Data Workbook

Cost burden and severe cost burden

The U.S. Department of Housing and Urban Development (HUD) 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 its income on housing costs are considered "severely cost-burdened." In Millbrae, 17% of households spend 30%-50% of their income on housing, while 18% of households are severely cost-burdened and use the majority of their income for housing.

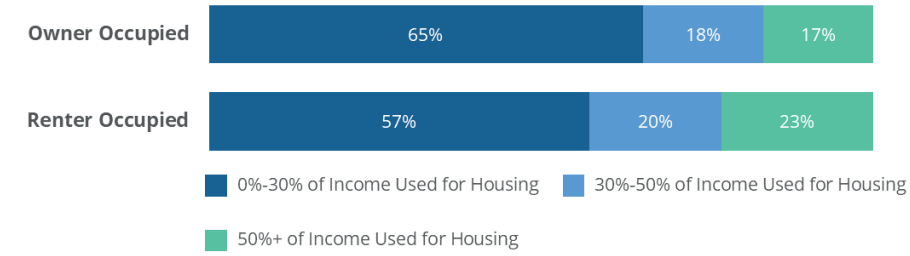
Cost-burdened households are a regional and statewide issue. In Millbrae, nearly two out of every five (38%) households in the City of Millbrae are housing cost-burdened—spending more than 30% of their income on housing costs (Figure IV-9). Renters are more likely to be cost-burdened, with 43% of renter households cost-burdened and 23% extremely cost-burdened—spending more than 50% of their income on housing costs (Figure IV-10). When compared to surrounding cities, Millbrae's high-cost burden seems to be the norm for the area (Figure IV-11). **When comparing Cost Burden by Tenure to surrounding cities, Millbrae is within 3 percentage points of all the surrounding cities but Hillsborough for all categories listed. This points towards the high-cost burden being much more of a regional problem than a problem specific to Millbrae.**

Figure IV-9. Overpayment (Cost Burden) by Jurisdiction, 2019



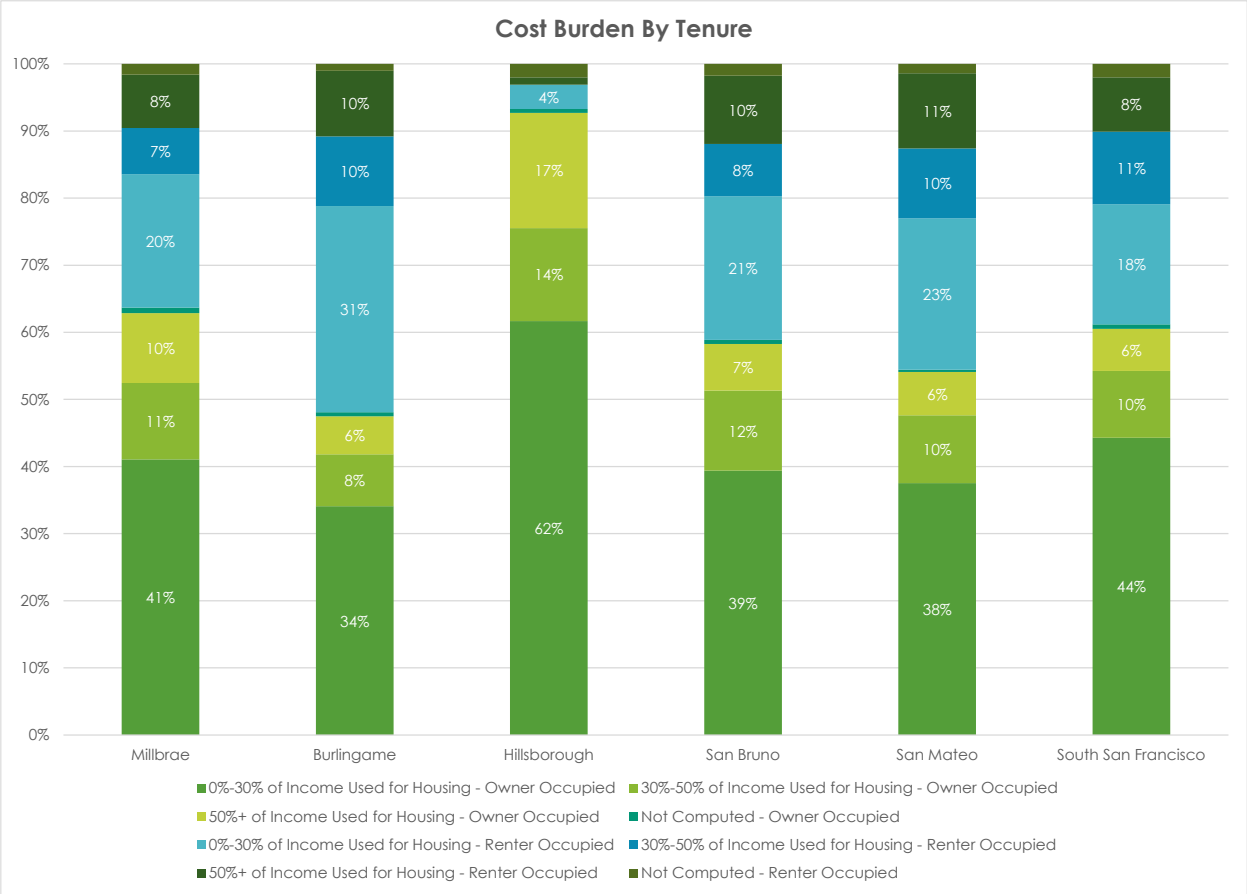
Source: ABAG Housing Needs Data Workbook

Figure IV-10. Overpayment (Cost Burden) by Tenure, City of Millbrae, 2019



Source: ABAG Housing Needs Data Workbook

Figure IV-11. Overpayment (Cost Burden) by Tenure, City of Millbrae and Surrounding Cities, 2019



Source: ABAG Housing Needs Data Workbook

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. These figures do not substantially differ from the County.

Low to moderate-income households are more likely to be cost-burdened in the City (Figure IV-12). **When compared to surrounding cities, the cost burden seems to be a more regional issue than an issue that is specific to Millbrae (Figure IV-13). The Sites Inventory sites will work to address the high-cost burden by providing more affordable housing to households in the lower income levels.**

Figure IV-12. Overpayment (Cost Burden) by Area Median Income (AMI), City of Millbrae, 2019

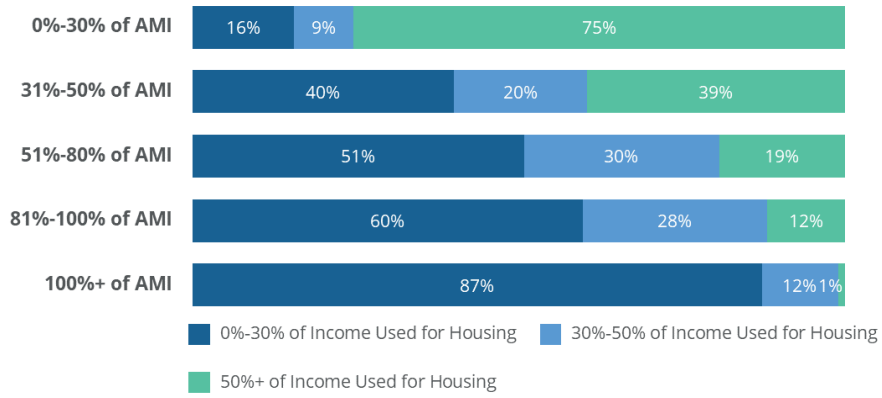


Figure IV-13. Overpayment (Cost Burden) by Area Median Income (AMI), City of Millbrae and Surrounding Cities, 2019

City	Income Group	0%-30% of Income Used for Housing		30%-50% of Income Used for Housing		50%+ of Income Used for Housing	
Millbrae	0%-30% of AMI	144	3%	84	6%	695	47%
	31%-50% of AMI	389	7%	198	14%	383	26%
	51%-80% of AMI	620	12%	365	26%	235	16%
	81%-100% of AMI	549	10%	259	19%	109	7%
	Greater than 100% of AMI	3,595	68%	479	35%	45	3%
	Totals	**5,297**	**100%**	**1,385**	**100%**	**1,467**	**100%**
Burlingame	0%-30% of AMI	140	2%	80	4%	1,159	56%
	31%-50% of AMI	205	3%	345	17%	500	24%
	51%-80% of AMI	660	8%	700	34%	254	12%
	81%-100% of AMI	754	10%	365	18%	60	3%
	Greater than 100% of AMI	6,035	77%	570	28%	95	5%
	Totals	**7,794**	**100%**	**2,060**	**100%**	**2,068**	**100%**
Hillsborough	0%-30% of AMI	0	0%	25	5%	135	19%
	31%-50% of AMI	20	1%	0	0%	140	20%
	51%-80% of AMI	70	3%	55	11%	125	18%
	81%-100% of AMI	94	4%	15	3%	65	9%
	Greater than 100% of AMI	2,245	92%	390	80%	240	34%
	Totals	**2,429**	**100%**	**485**	**100%**	**705**	**100%**
San Bruno	0%-30% of AMI	340	4%	265	9%	1,210	48%
	31%-50% of AMI	560	6%	494	16%	634	25%
	51%-80% of AMI	1,260	14%	1,234	41%	515	20%
	81%-100% of AMI	1,400	15%	500	17%	105	4%
	Greater than 100% of AMI	5,690	62%	515	17%	75	3%
	Totals	**9,250**	**100%**	**3,008**	**100%**	**2,539**	**100%**
San Mateo	0%-30% of AMI	645	3%	610	8%	3,395	53%
	31%-50% of AMI	1,075	4%	1,800	23%	1,700	26%
	51%-80% of AMI	2,625	11%	2,305	29%	1,055	16%
	81%-100% of AMI	2,680	11%	1,305	16%	114	2%
	Greater than 100% of AMI	16,880	71%	1,960	25%	180	3%
	Totals	**23,905**	**100%**	**7,980**	**100%**	**6,444**	**100%**
South San Francisco	0%-30% of AMI	639	5%	415	11%	1,970	59%
	31%-50% of AMI	960	7%	763	20%	790	24%
	51%-80% of AMI	2,385	18%	1,460	37%	490	15%
	81%-100% of AMI	1,875	14%	650	17%	65	2%
	Greater than 100% of AMI	7,429	56%	615	16%	34	1%
	Totals	**13,288**	**100%**	**3,903**	**100%**	**3,349**	**100%**

Source: ABAG Housing Needs Data Workbook

The data also shows disparities in housing cost burden in the City of Millbrae by race and ethnicity. Black, American Indian, and Hispanic households are the most likely to experience a cost burden. American Indian households have high rates of extreme cost burden at 43%. Conversely, Asian and non-Hispanic White households are least likely to be cost-burdened (Figure IV-14 and IV-15). This may be due to the small sample size of those minority households within Millbrae as the population has a large majority of Asian and White households. A comparison table for surrounding cities can be seen in Figure IV-16. **When compared to surrounding cities, the City of Millbrae has a smaller proportion of minority households with cost burdens.**

Figure IV-14. Overpayment (Cost Burden) by Race and Ethnicity, City of Millbrae, 2019

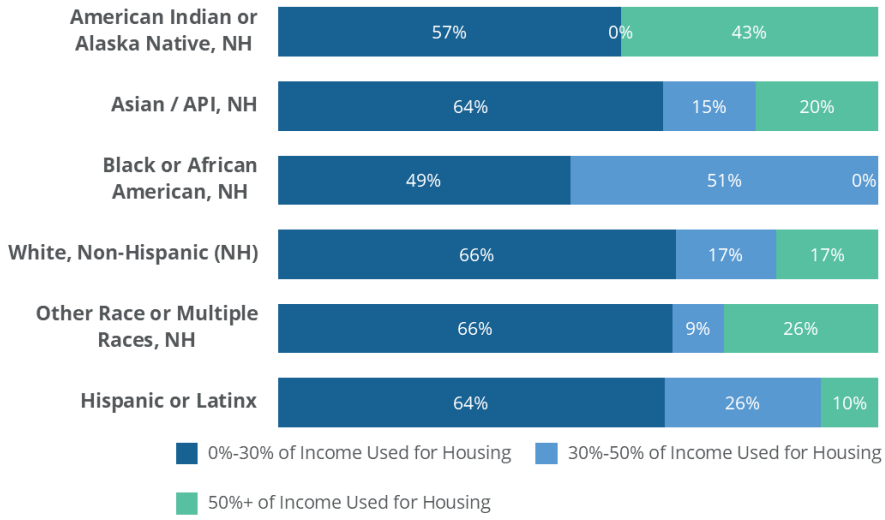


Figure IV-15. Overpayment (Cost Burden) by Family Size, City of Millbrae, 2019

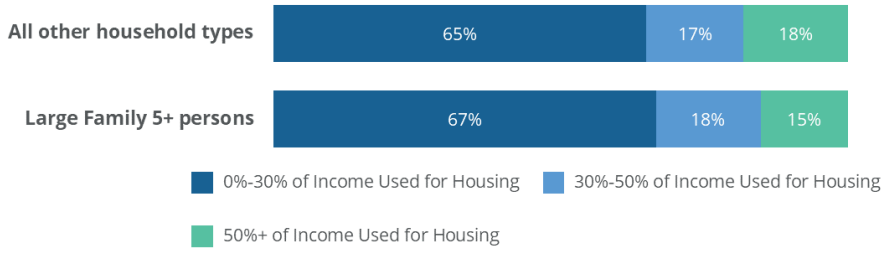


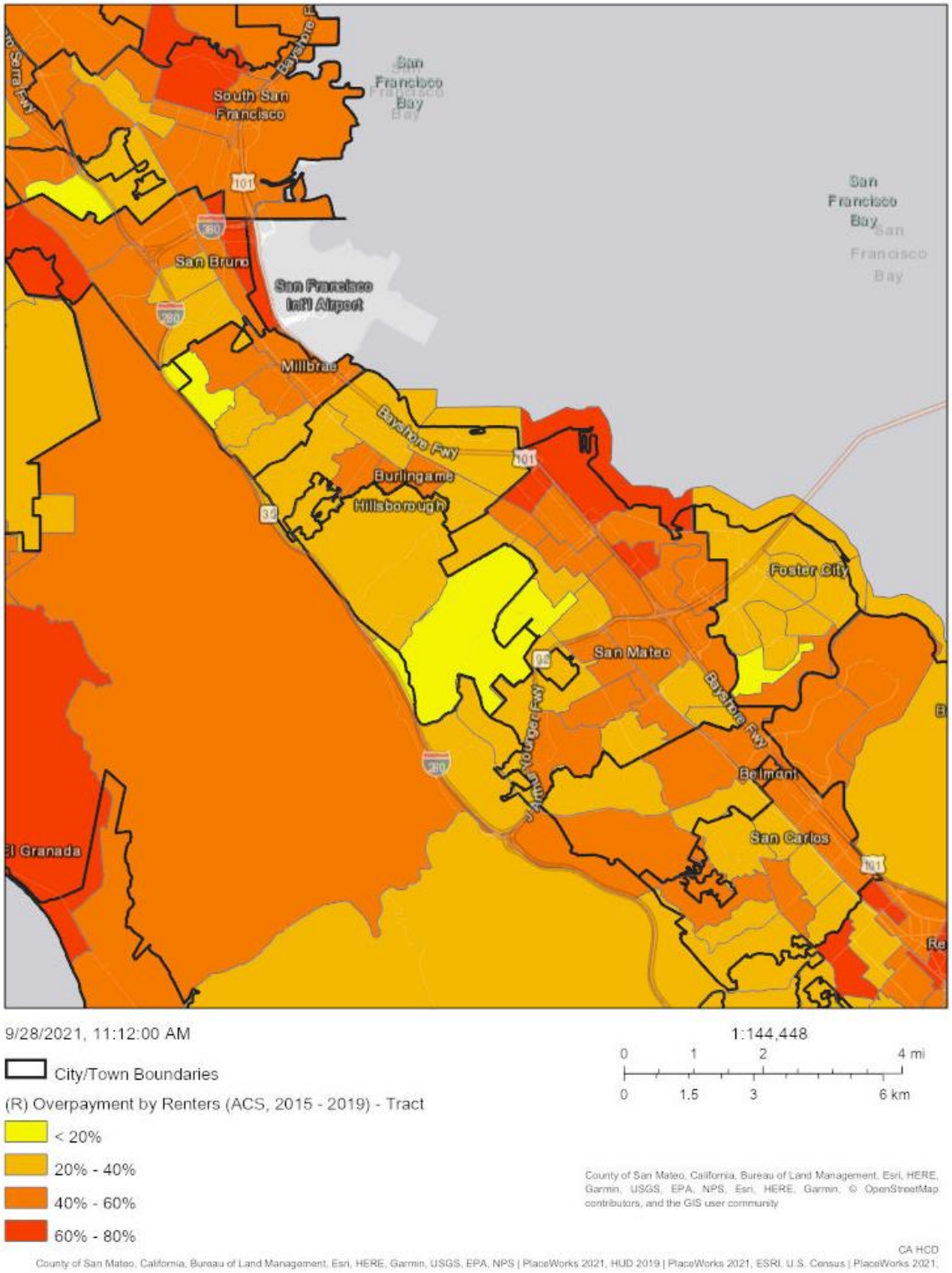
Figure IV-16. Overpayment (Cost Burden) by Race and Ethnicity, City of Millbrae and Surrounding Cities, 2019

City	Racial / Ethic Group	0%-30% of Income Used for Housing		30%-50% of Income Used for Housing		50%+ of Income Used for Housing		Cost Burden Not computed	
Millbrae	American Indian or Alaska Native, Non-Hispanic	20	0%	0	0%	15	1%	0	0%
	Asian / API, Non-Hispanic	2,305	43%	550	40%	735	50%	35	54%
	Black or African American, Non-Hispanic	19	0%	20	1%	0	0%	0	0%
	White, Non-Hispanic	2,275	43%	575	41%	585	40%	30	46%
	Other Race or Multiple Races, Non-Hispanic	115	2%	15	1%	45	3%	0	0%
	Hispanic or Latinx	570	11%	230	17%	85	6%	0	0%
	Totals	**5,304**	**100%**	**1,390**	**100%**	**1,465**	**100%**	**65**	**100%**
Burlingame	American Indian or Alaska Native, Non-Hispanic	15	0%	0	0%	0	0%	0	0%
	Asian / API, Non-Hispanic	1,980	25%	360	18%	330	16%	20	31%
	Black or African American, Non-Hispanic	125	2%	60	3%	0	0%	0	0%
	White, Non-Hispanic	4,910	63%	1,185	58%	1,350	65%	45	69%
	Other Race or Multiple Races, Non-Hispanic	185	2%	140	7%	35	2%	0	0%
	Hispanic or Latinx	585	8%	305	15%	355	17%	0	0%
	Totals	**7,800**	**100%**	**2,050**	**100%**	**2,070**	**100%**	**65**	**100%**
Hillsborough	American Indian or Alaska Native, Non-Hispanic	0	0%	0	0%	0	0%	0	0%
	Asian / API, Non-Hispanic	620	26%	185	38%	215	30%	30	55%
	Black or African American, Non-Hispanic	10	0%	4	1%	20	3%	0	0%
	White, Non-Hispanic	1,725	71%	255	53%	425	60%	25	45%
	Other Race or Multiple Races, Non-Hispanic	25	1%	25	5%	25	4%	0	0%
	Hispanic or Latinx	45	2%	15	3%	20	3%	0	0%
	Totals	**2,425**	**100%**	**484**	**100%**	**705**	**100%**	**55**	**100%**
San Bruno	American Indian or Alaska Native, Non-Hispanic	20	0%	0	0%	10	0%	0	0%
	Asian / API, Non-Hispanic	2,945	32%	720	24%	675	27%	80	36%
	Black or African American, Non-Hispanic	160	2%	70	2%	65	3%	0	0%
	White, Non-Hispanic	4,310	47%	1,220	41%	815	32%	100	45%
	Other Race or Multiple Races, Non-Hispanic	290	3%	65	2%	160	6%	0	0%
	Hispanic or Latinx	1,520	16%	930	31%	815	32%	40	18%
	Totals	**9,245**	**100%**	**3,005**	**100%**	**2,540**	**100%**	**220**	**100%**
San Mateo	American Indian or Alaska Native, Non-Hispanic	85	0%	0	0%	0	0%	0	0%
	Asian / API, Non-Hispanic	6,335	27%	1,930	24%	1,119	17%	85	36%
	Black or African American, Non-Hispanic	330	1%	305	4%	170	3%	0	0%
	White, Non-Hispanic	13,415	56%	3,840	48%	3,080	48%	130	55%
	Other Race or Multiple Races, Non-Hispanic	730	3%	145	2%	135	2%	0	0%
	Hispanic or Latinx	3,010	13%	1,755	22%	1,915	30%	20	9%
	Totals	**23,905**	**100%**	**7,975**	**100%**	**6,419**	**100%**	**235**	**100%**
South San Francisco	American Indian or Alaska Native, Non-Hispanic	0	0%	8	0%	4	0%	0	0%
	Asian / API, Non-Hispanic	5,350	40%	1,445	37%	1,065	32%	105	60%
	Black or African American, Non-Hispanic	245	2%	150	4%	100	3%	0	0%
	White, Non-Hispanic	3,895	29%	1,000	26%	655	20%	35	20%
	Other Race or Multiple Races, Non-Hispanic	310	2%	125	3%	275	8%	0	0%
	Hispanic or Latinx	3,495	26%	1,170	30%	1,235	37%	35	20%
	Totals	**13,295**	**100%**	**3,898**	**100%**	**3,334**	**100%**	**175**	**100%**

Source: ABAG Housing Needs Data Workbook

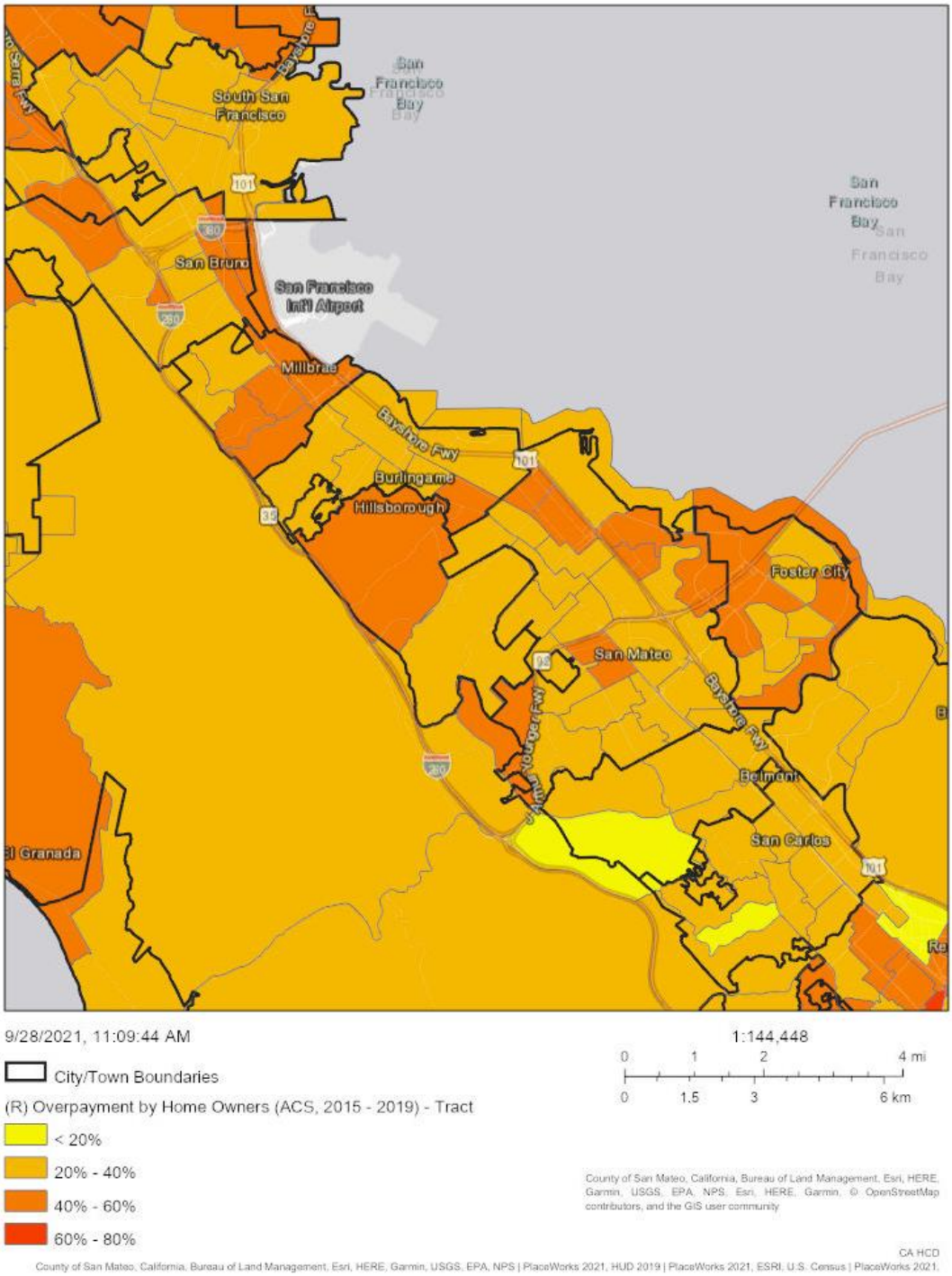
Geospatially, renters and owners experiencing cost burden are primarily concentrated in the north and east areas of the City, adjacent to the City of Burlingame and the San Francisco Airport, with cost burden rates between 40% and 60% for renter and owner households in these census tracts (Figure IV-17 and Figure IV-18). **Nearly 100% of Sites Inventory sites are located within areas with a high-cost burden which works to meet the needs of affordable housing in the area.**

Figure IV-17. Overpayment (Cost Burden) for Renter Households by Census Tract, 2019



Source: California Department of Housing and Community Development AFFH Data Viewer

Figure IV-18. Overpayment (Cost Burden) for Owner Households by Census Tract, 2019



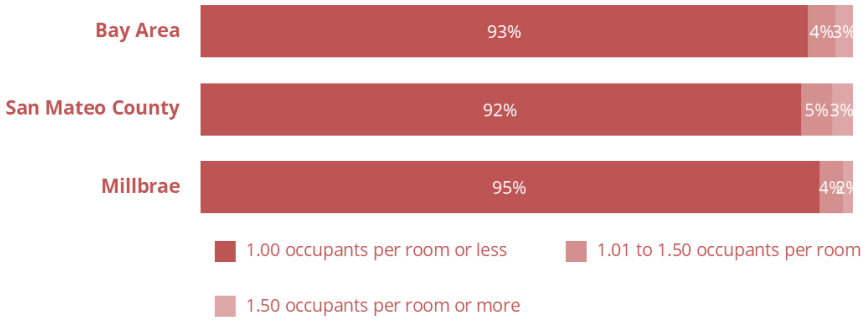
Source: California Department of Housing and Community Development AFFH Data Viewer

Programs HIP-18, 22, 23, 31, 32, 35, 36, and 46 will mitigate and address the lack of affordability and cost burden by planning for and facilitating the development of affordable housing, particularly for lower incomes.

Overcrowding

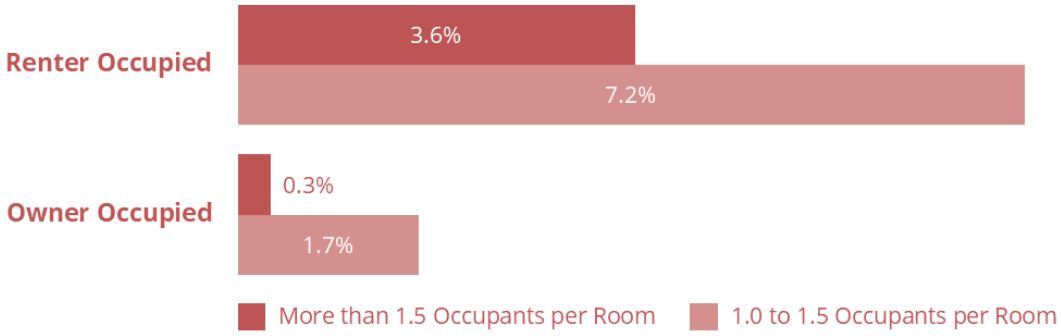
The vast majority of households (95%) in the City of Millbrae are not overcrowded—indicated by more than one occupant per room (Figure IV-19). However, renter households are more likely to be overcrowded with 10.8% of households with more than one occupant per room compared to 2% of owner households (Figure IV-20).

Figure IV-19. Occupants per Room by Jurisdiction, 2019



Source: ABAG Housing Needs Data Workbook

Figure IV-20. Occupants per Room by Tenure, City of Millbrae, 2019



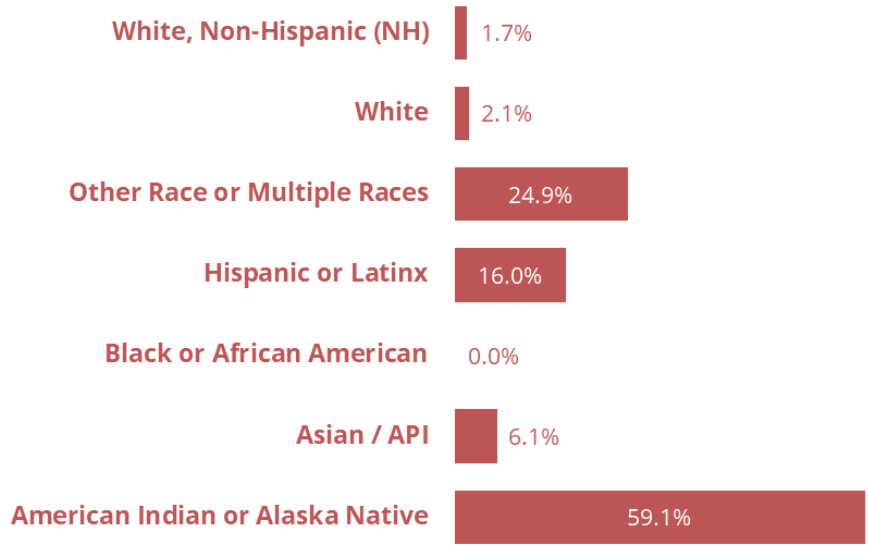
Source: ABAG Housing Needs Data Workbook

The resident survey shows higher needs: 21% of respondents said that their house or apartment is not big enough for their family members.

Racial and ethnic minorities are more likely than non-Hispanic White households to experience overcrowding. Households that identify as American Indian are most likely to be overcrowded

(59%) followed by other or multiple races (25%), Hispanic households (16%), and Asian households (6%) (Figure IV-21 and Figure IV-22).

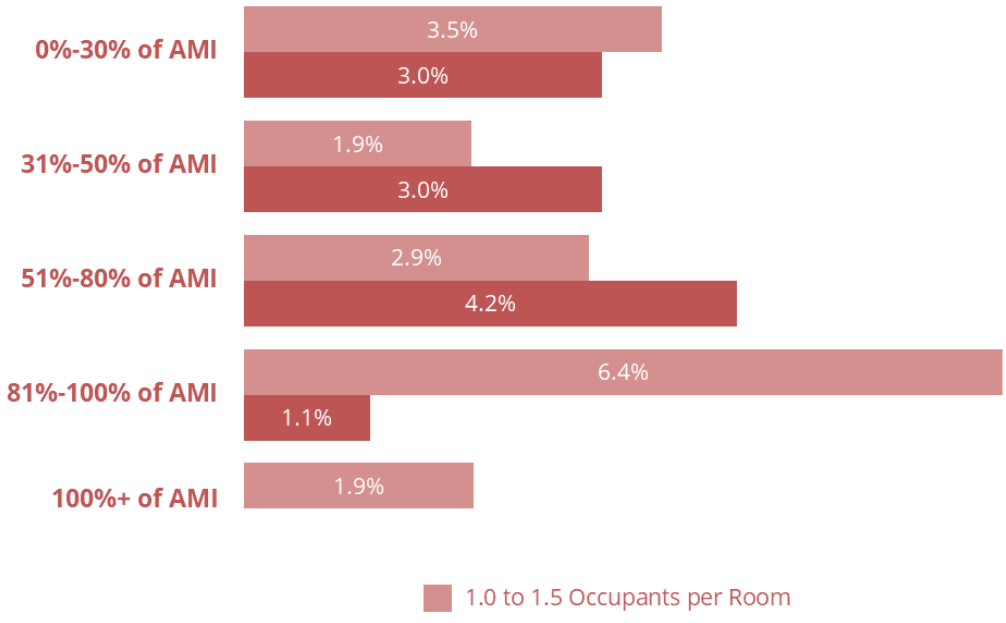
Figure IV-21. Overcrowding by Race and Ethnicity, City of Millbrae, 2019



Note: Overcrowding is indicated by more than 1 person per room.

Source: ABAG Housing Needs Data Workbook

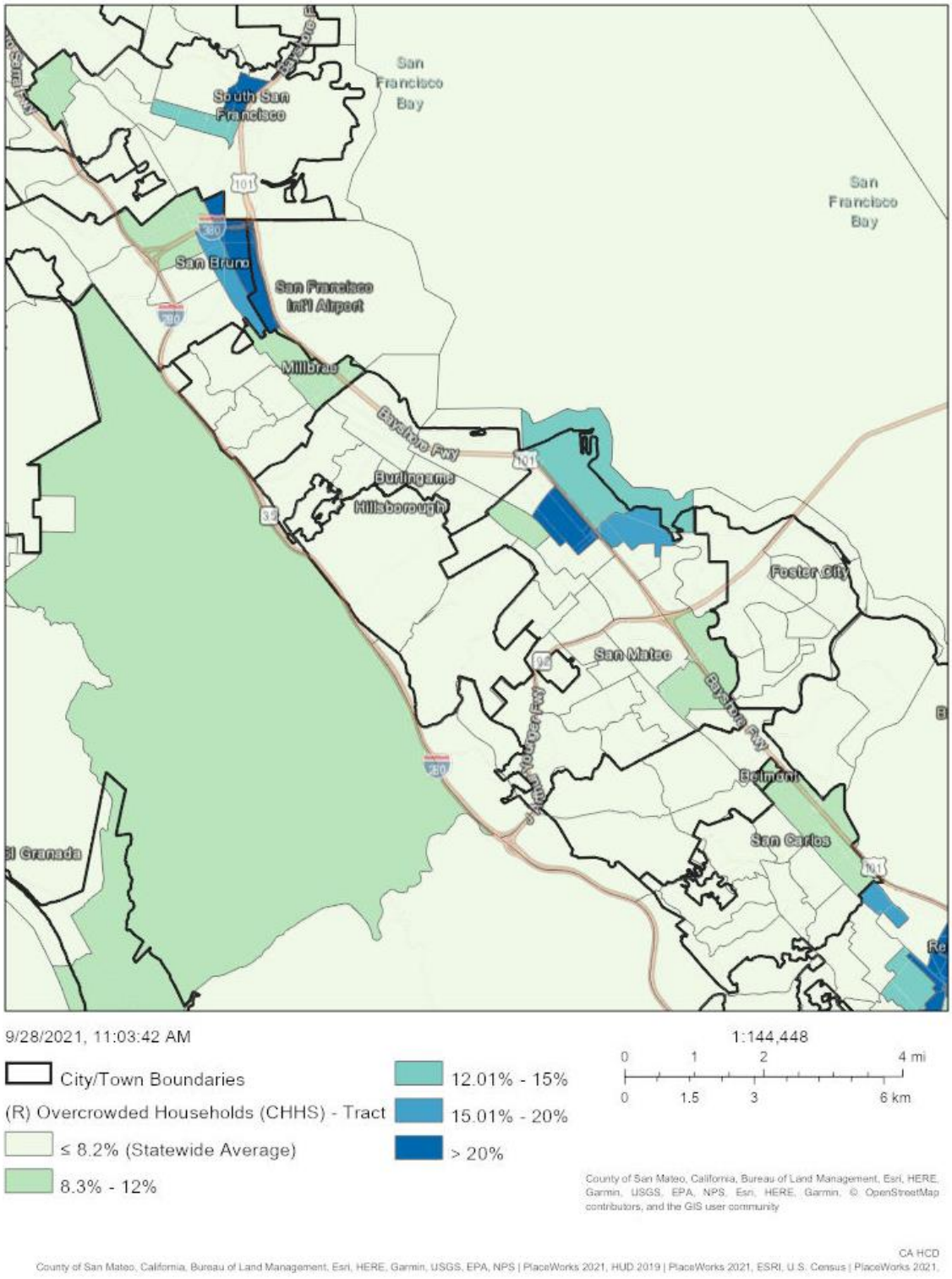
Figure IV-22. Occupants per Room by AMI, City of Millbrae, 2019



Source: ABAG Housing Needs Data Workbook

Geographically, the census tract adjacent to the San Francisco Airport's share of overcrowded households is slightly higher than the State average of 8.2% (Figure IV-23). **Nearly 100% of the Site Inventory sites are located in that census tract which provides additional affordable housing in the portions of the City where it is needed.**

Figure IV-23. Overcrowded Households by Census Tract, 2019

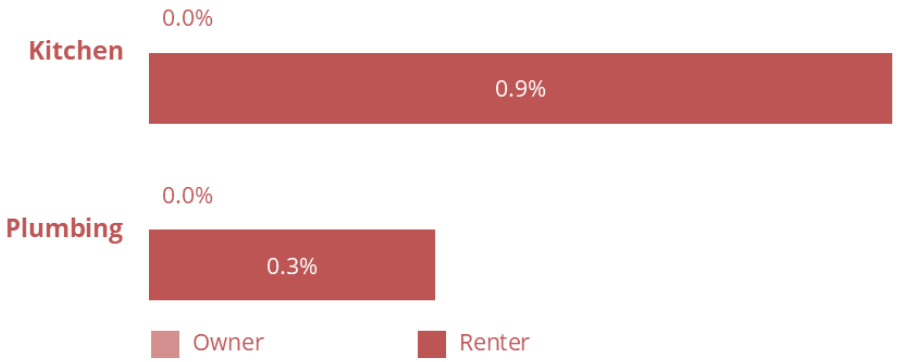


Source: California Department of Housing and Community Development AFFH Data Viewer

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 to afford to house. Data on housing conditions are very limited, with the most consistent data available across jurisdictions found in the American Community Survey (ACS)—which captures units in substandard condition as self-reported in Census surveys. Renter households are also more likely to have substandard kitchen and plumbing facilities compared to owner households in Millbrae. Generally, a low share of households lack kitchen or plumbing. Of renters, less than 1% are lacking kitchen facilities or plumbing. For owners, no households are lacking these facilities (Figure IV-24).

Figure IV-24. Percent of Units Lacking Complete Kitchen and Plumbing Facilities, City of Millbrae, 2019



Source: ABAG Housing Needs Data Workbook

In addition to the ACS 5-Year Data (2015-2019) provided above, the City performed a windshield survey in the Millbrae neighborhood east of the El Camino Real Corridor to estimate the number of residential structures in need of rehabilitation and replacement. This neighborhood has been historically disadvantaged relative to the rest of the City. There have been several issues over the years such as flooding, neglected parks, lack of sidewalks on several blocks, and a general lack of investment. **The *Neighborhood Patterns* section of this Appendix B (p. B-135) provides a detailed analysis of the conditions present in this neighborhood, along with the northern area of the City.**

More specifically, City Planning Division staff conducted a windshield survey in this area to evaluate the physical condition of the residential structures as visible from the public right-of-way. It should be noted that the survey did not include any evaluation of the interior housing conditions of the residential structures surveyed nor did it include an evaluation of any other physical conditions that were not visible from the street. Additionally, while the data presented in Figure 2-24 identified a small percentage of homes surveyed experienced a lack of kitchen

facilities, the windshield survey did not seek to corroborate these findings, solely focusing on the demonstration of rehabilitative needs of the exterior of the structures being surveyed.

In total, City staff surveyed approximately 600 residential parcels, and over 99% were evaluated as being in sound condition, meaning they presented no visible signs of overdue maintenance or minor damage to the residential structure's exterior, foundation, roof, or windows and doors as visible from the street. The survey did, however, identify 25 parcels, less than 1% of the residential structures surveyed, showing signs of deterioration, dilapidation, and/or unsafe conditions. The conditions observed included: damaged siding or stucco, damaged fences, damaged garage doors, broken room windows, damaged roofs, and broken garage door windows.

Although less than 1% of the residential structures surveyed showed signs of deterioration, dilapidation, and/or unsafe conditions, the City included program HIP-6, Encourage the Rehabilitation of Substandard Housing Units, in Chapter 8, Housing Plan, of this Housing Element to encourage the rehabilitation of substandard housing units.

Homelessness

In 2019, 1,512 people were experiencing homelessness in the County, 40% of people were in an emergency or transitional shelter while the remaining 60% were unsheltered. **According to a 2022 point-in-time count, 9 were located in Millbrae (less than 1% of the County total). However, the population of Millbrae represents just 1% of the County's total population.**

The majority of unsheltered people experiencing homelessness were in households without children. The majority of people in transitional housing were in households with children (Figure IV-25).

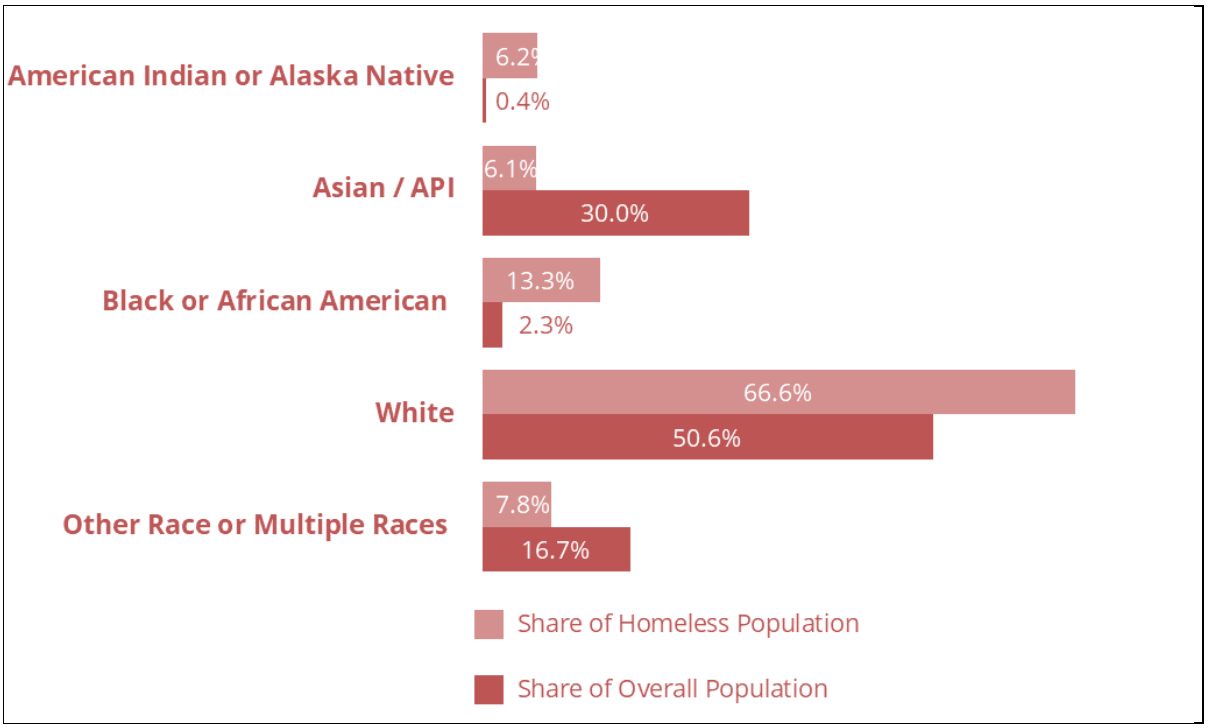
Figure IV-25. Homelessness by Household Type and Shelter Status, San Mateo County, 2019

Source: ABAG Housing Needs Data Workbook

	People in Households Solely Children	People in Households with Adults and Children	People in Households Without Children
Sheltered - Emergency Shelter	0	68	198
Sheltered - Transitional Housing	0	271	74
Unsheltered	1	62	838

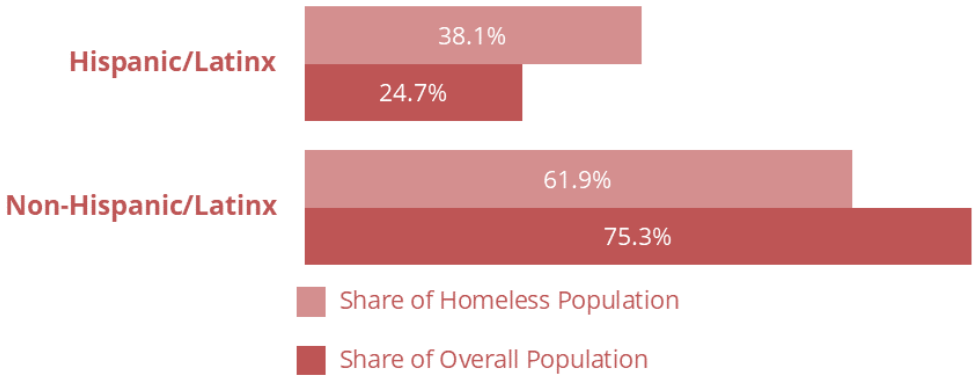
People who identify as American Indian or Alaskan Native (6% homeless, less than 1% general population), Black (13%, 2%), White (67%, 51%), and Hispanic (38%, 28%) are overrepresented in the homeless population compared to their share of the general population (Figure IV-26 and Figure IV-27). People struggling with chronic substance abuse (112 people), severe mental illness (305), and domestic violence (127) represent a substantial share of the homeless population in 2019 (Figure IV-28).

Figure IV-26. Share of General and Homeless Populations by Race, San Mateo County, 2019



Source: ABAG Housing Needs Data Workbook

Figure IV-27. Share of General and Homeless Populations by Ethnicity, San Mateo County, 2019



Source: ABAG Housing Needs Data Workbook

Figure IV-28. Characteristics of the Population Experiencing Homelessness, San Mateo County, 2019

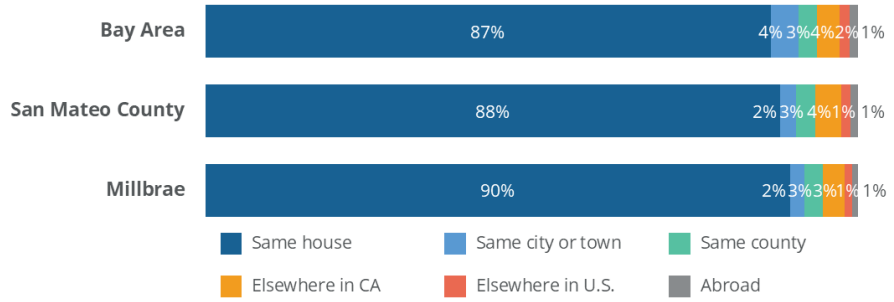
	Chronic Substance Abuse	HIV/AIDS	Severely Mentally Ill	Veterans	Victims of Domestic Violence
Sheltered - Emergency Shelter	46	0	70	31	10
Sheltered - Transitional Housing	46	3	46	4	14
Unsheltered	20	0	189	34	103

Source: ABAG Housing Needs Data Workbook

Displacement

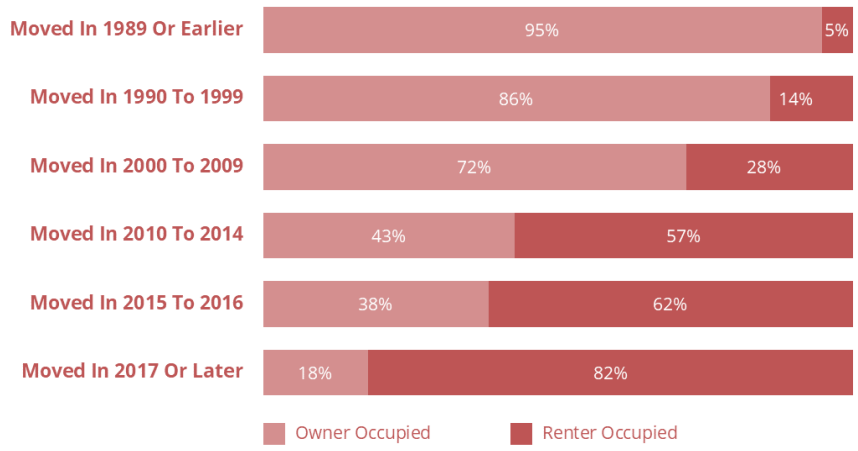
Owner households generally experience a greater amount of housing stability whereas renter households are more mobile (i.e., move more frequently). Households in the City were less likely to have moved in the past year compared to the households in the County (Figure IV-29 and Figure IV-30).

Figure IV-29. Location of Population One Year Ago, City of Millbrae, 2019



Source: ABAG Housing Needs Data Workbook

Figure IV-30. Tenure by Year Moved to Current Residence, City of Millbrae, 2019



Source: ABAG Housing Needs Data Workbook

There are currently 26 income-restricted units in the City of Millbrae. **The affordability restrictions for these units will NOT expire during the 6th Cycle Housing Element planning period or within the next 10 years. Therefore, these units are designated with a low risk of displacement because they will remain affordable during the 6th Cycle.** The supply of assisted units is less than 1% of the inventory in San Mateo County. The small share of assisted housing units in the City may be indicative of exclusion (Figure IV-31).

Figure IV-31. Assisted Units at Risk of Conversion, City of Millbrae, 2019

	Low	Moderate	High	Very High	Total Assisted Units in Database
Millbrae	26	0	0	0	26
San Mateo County	4,656	191	359	58	5,264
Bay Area	110,177	3,375	1,854	1,053	116,459

Source: ABAG Housing Needs Data Workbook

Displacement Sensitive Communities

"According to the Urban Displacement Project, communities were designated sensitive if they met the following criteria:

- They currently have populations vulnerable to displacement in the event of increased redevelopment and drastic shifts in housing costs. Vulnerability is defined as:
    - Share of very low-income residents is above 20%, 2017
    - AND
    - The tract meets two of the following criteria:
        - Share of renters is above 40%, 2017
        - Share of people of color is above 50%, 2017
        - Share of very low-income households (50% AMI or below) that are severely rent burdened households is above the County median, 2017
        - They or areas nearby have been experiencing displacement pressures. Displacement pressure is defined as:
            - Percent change in rent above County median for rent increases, 2012-2017
- OR
- Difference between tract median rent and the median rent for surrounding tracts above the median for all tracts in the County (rent gap), 2017"

Source: https://www.sensitivecommunities.org/.

The resident survey conducted for this study found that 1 in 5 residents in San Mateo County have been displaced in the past 5 years. The top reason for displacement was "*the rent increased more than I could pay."* A Summary of the Community Survey Results is located in Attachment A.

The City's Hazard Mitigation Plan presents its ranking of hazards listed in Table IV-1.

Table IV-1. Hazard Risk Ranking

Rank	Hazard Type	Risk Rating Score (Probability x Impact)	Category
1	Earthquake	48	High
2	Severe Weather	33	Medium
3	Flood	18	Medium
4	Landslide	18	Medium
5	Drought	3	Low
6	Dam Failure	0	Low
7	Wildfire	0	Low

Table IV-2 lists the actions that make up the City of Millbrae's hazard mitigation action plan.

Table IV-2. Hazard Mitigation Action Plan Matrix

Action G-4—Where feasible, implement a program to record high water marks following high-water events.						
New and existing	Flooding, Severe Weather	1, 3, 4, 5, 6	Jurisdictions	Medium	General Fund; FEMA Grant Funds (Public Assistance)	Long-term
Action G-5—Integrate the hazard mitigation plan into other plans, programs, or resources that dictate land use or redevelopment.						
New and existing	All	1, 2, 3, 4, 5, 6, 7, 8, 10	Jurisdictions	Low	General Fund	Short-term
Action G-6—Provide incentives for eligible non-profits and private entities, including homeowners, to adapt to risks through structural and nonstructural retrofitting.						
New and existing	All	2, 3, 4, 5, 6, 7, 8, 10, 11	Jurisdictions	Low	Operating Budgets	Ongoing
Action G-7— Support the County-wide initiatives identified in Volume I of the hazard mitigation plan.						
New and existing	All	All	Jurisdictions	Low	General Fund	Short- and long-term
Action G-8— Actively participate in the plan maintenance protocols outlined in Volume I of the hazard mitigation plan.						
New and Existing	All	1, 4	Jurisdictions	Low	Staff Time, General Funds	Short-term
	Tsunami				Enterprise Funds	
Action #MB-6: Inspect and Retrofit Millbrae Avenue Overpass						
Existing	Earthquake	1, 4, 6 & 11	City of Millbrae	Medium	General Fund	Ongoing
Action #MB-7: Retrofit, acquire, or relocate the identified SRL property within Millbrae.						
Existing	Flood	1,3,4,5,6,7, 8,11	City of Millbrae	High	HMGP, PDM	Long Term
Action G-1—Where appropriate, support retrofitting, purchase, or relocation of structures in hazard-prone areas to prevent future structure damage. Give priority to properties with exposure to repetitive losses.						
Existing	All	1, 3, 4, 5, 6, 7, 11	Jurisdictions	High	FEMA Hazard Mitigation Grants	Long-term (depending on funding)

According to the Urban Displacement Project, four census tracts in the City are vulnerable to displacement representing 76.4% of the total City population (ACS 2020 Five-Year Estimates)—these same Tracts have lower median incomes, lower environmental outcomes, and higher rates of housing cost burden (Figure IV-32, IV-33, and IV-34). Nearly 100% of the Sites Inventory Sites are located within these vulnerable tracts. Additionally, some areas of the City along San Francisco Bay are included in the Special Flood Hazard Areas (Figure IV-35). **More specifically, five of the 26 sites in the Sites Inventory are located within the FEMA Special Flood Areas (Site Nos. 1, 9, 10, 19, and 20). Of these five sites, three (Site Nos. 1, 19, and 20) have a majority of the site within the Flood Area. However, it is important to note that Sites 19 and 20 are currently pipeline projects, demonstrating the feasibility of developing within the Flood Area with mitigation measures.** The City's Climate Action Plan (2020) also sets forth mitigation efforts to address flooding through, "integrated regional planning, design, permitting, project implementation, and long-term operations and maintenance to create a resilient 'one shoreline' San Mateo County by 2100."

The City of Millbrae is in the seismically active San Francisco Bay region, where earthquakes have historically represented a significant threat (Table IV-2). There are four active faults in proximity to Millbrae. The greatest seismic risk is the San Andreas Fault, which is oriented northwest to southeast and lies within one mile of the western edge of the city limits. Further to the west of the San Andreas Fault, the San Gregorio Fault enters San Mateo County from the Pacific Ocean at Half Moon Bay, approximately nine miles southwest of Millbrae.

Approximately 16 miles east of Millbrae, the Hayward Fault transects the eastern portion of the Bay Area just east of Oakland and Hayward. East and south of the Hayward Fault are the Calaveras Fault that runs from approximately the city of Danville to the south toward the city of Hollister as close as 26 miles east of Millbrae. The geologic and topographic character of an area determines its potential for landslides. Steep slopes, the extent of erosion, and the rock composition of a hillside can aid in predicting the probability of slope failure. Although Millbrae is not in a state-designated earthquake-induced landslide hazard zone, the ABAG Resilience Program has identified past landslides in the steeper slopes throughout the western portion of the city. Recent landslide events in Millbrae occurred in the steeper slopes of the western portion of the city as a result of heavy rainfall.

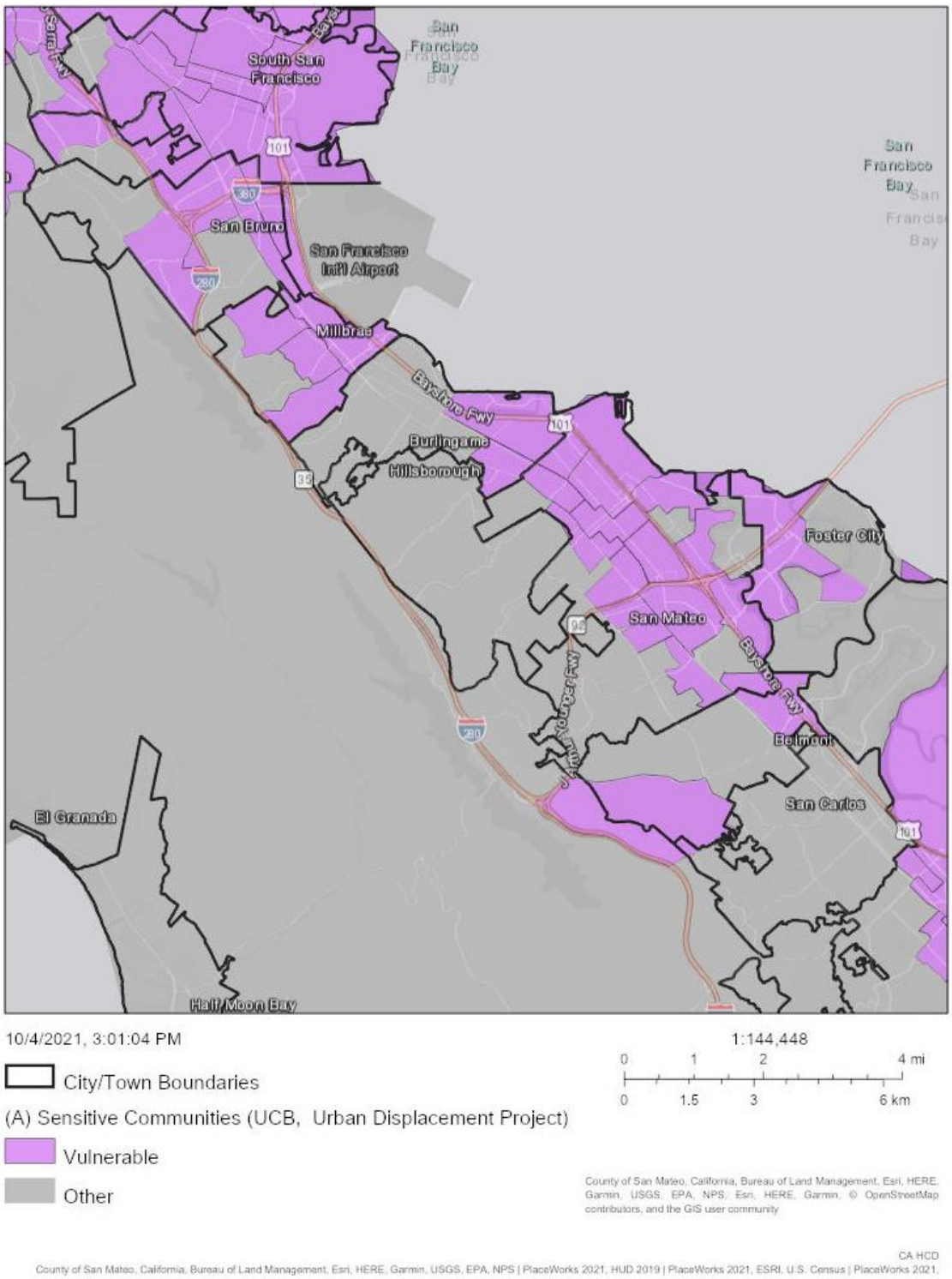
The City's Safety Element has established multiple programs to mitigate these geologic and seismic hazards including, but not limited to, programs for:

- Seismic Safety;
- Residential Seismic Upgrades;
- Seismic Modifications to Residential Facilities;
- Geotechnical and Structural Analysis for Steep Slopes; and

- Soil Stabilization

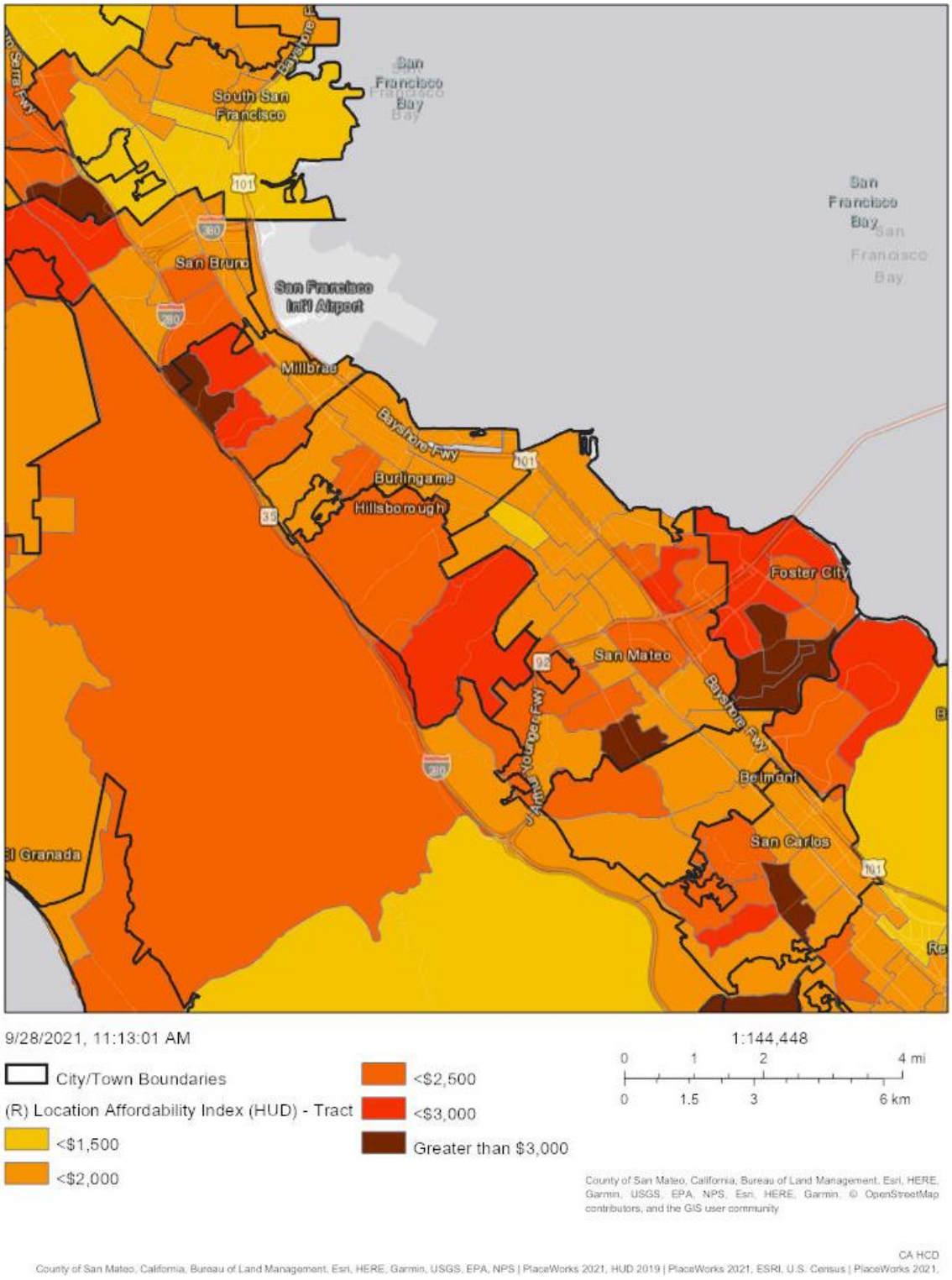
The vulnerability to displacement in the City stems from dramatic housing cost increases and a lack of affordable housing choices.

Figure IV-32. Census Tracts Vulnerable to Displacement



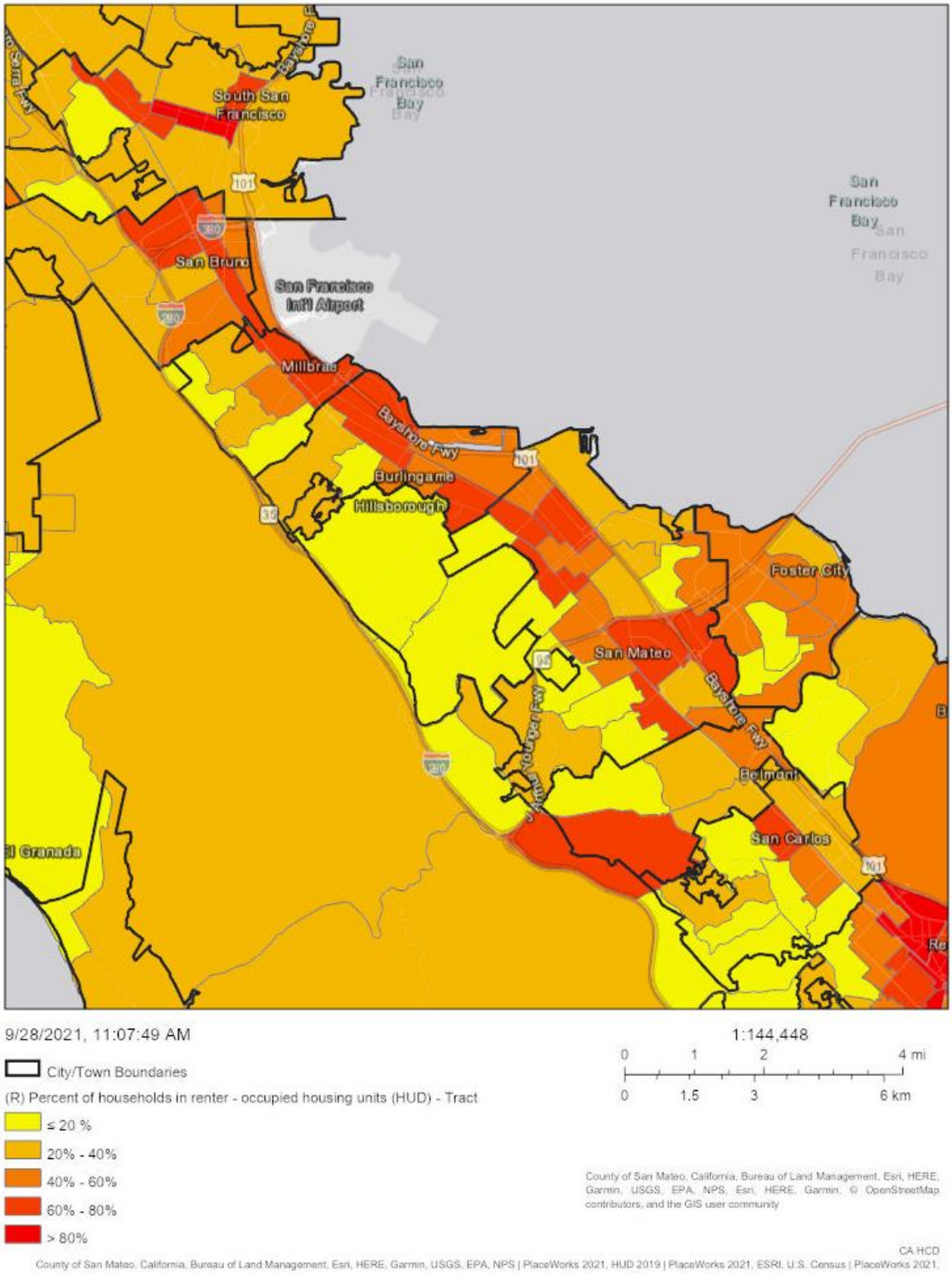
Source: California Department of Housing and Community Development AFFH Data Viewer

Figure IV-33. Location Affordability Index by Census Tract



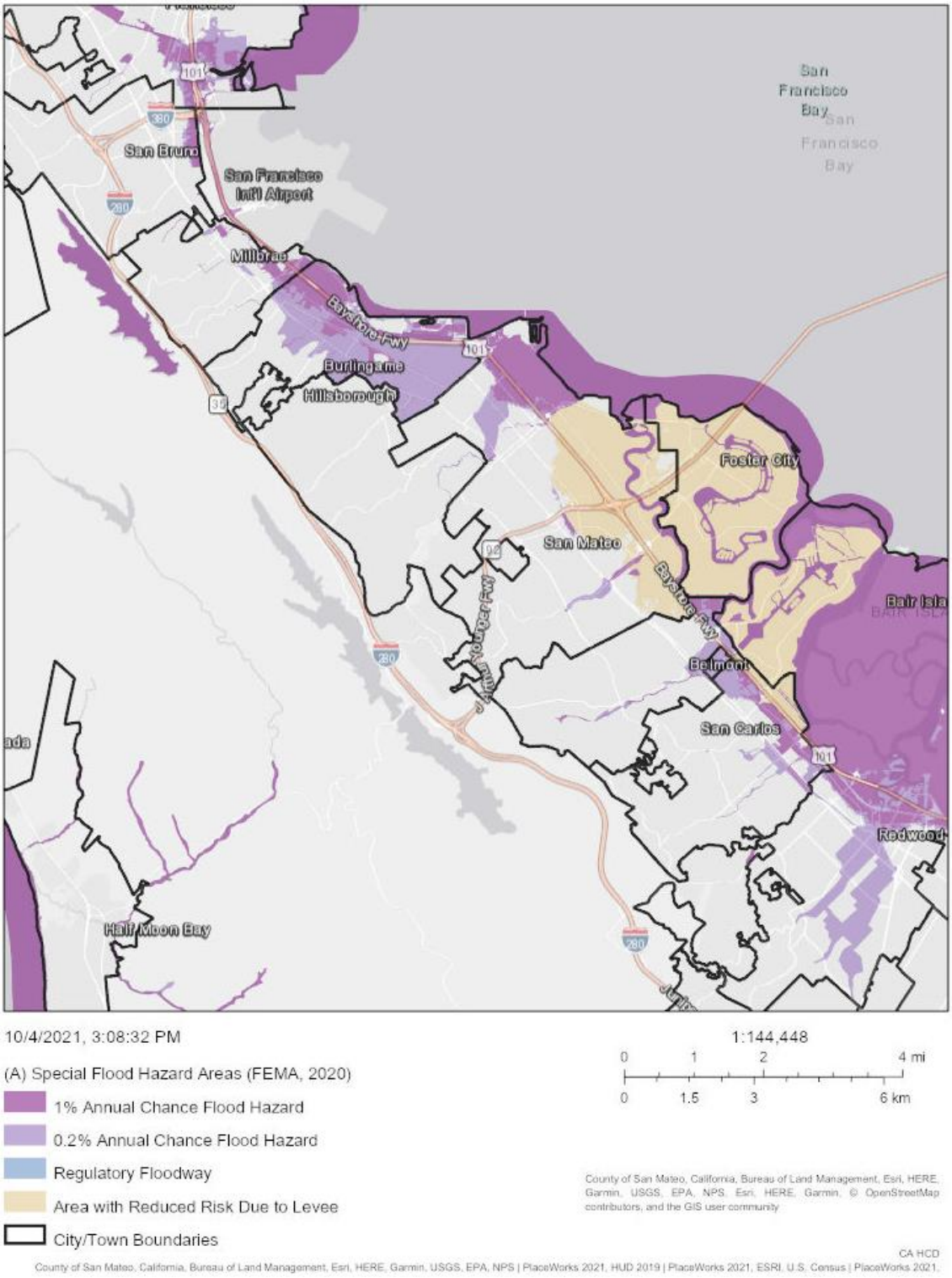
Source: California Department of Housing and Community Development AFFH Data Viewer

Figure IV-34. Share of Renter Occupied Households by Census Tract, 2019



Source: California Department of Housing and Community Development AFFH Data Viewer

Figure IV-35. Special Flood Hazard Areas, 2000

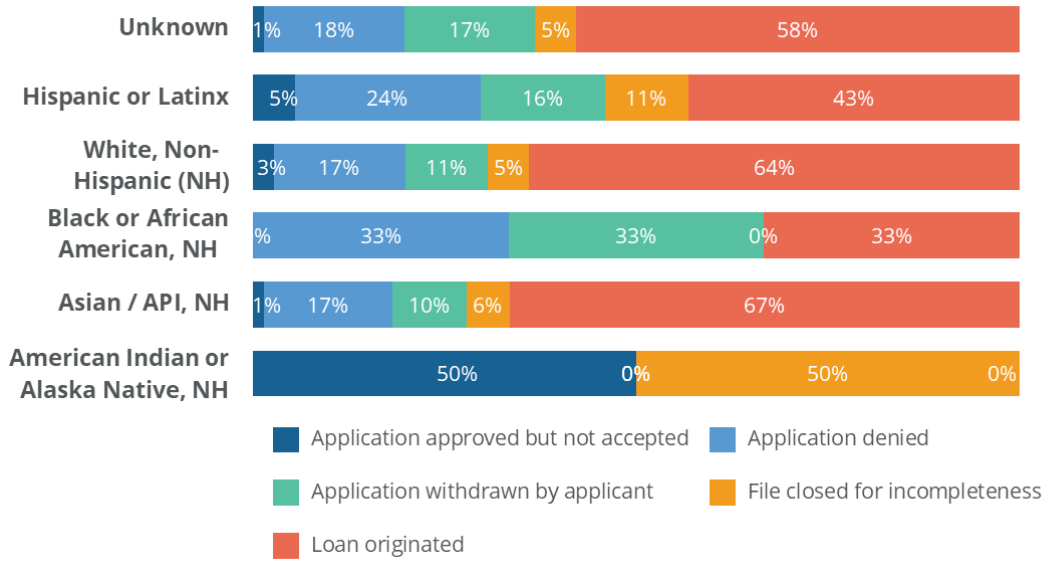


Source: California Department of Housing and Community Development AFFH Data Viewer

Access to mortgage loans

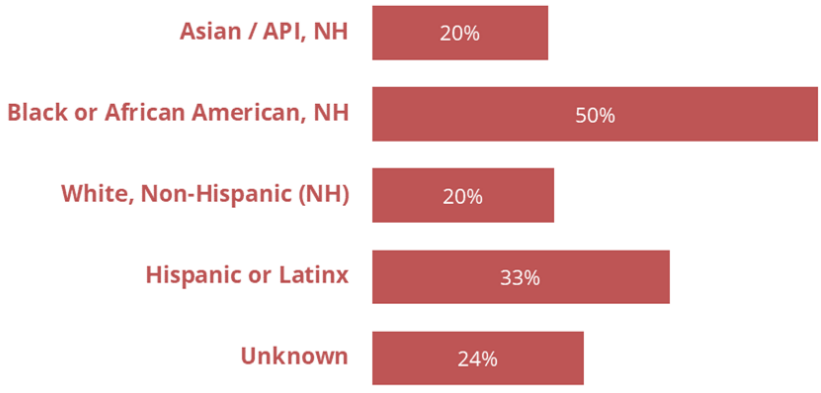
Disparities by race and ethnicity are also prevalent in home mortgage applications, particularly in denial rates (Figure IV-36). Black (50% denial rate) and Hispanic (33%) households had the highest mortgage loan denial rates from 2018 to 2019. Conversely, non-Hispanic whites (20%) and Asian households (20%) have the lowest denial rates (Figure IV-36 and IV-37). However, as seen in Figure IV-38, **surrounding cities show higher denial rates for Black and Hispanic households.**

Figure IV-36. Mortgage Applications by Race and Ethnicity, City of Millbrae, 2018-2019



Source: ABAG Housing Needs Data Workbook

Figure IV-37. Mortgage Application Denial Rate by Race and Ethnicity, City of Millbrae, 2018-2019



Source: ABAG Housing Needs Data Workbook

Figure IV-38. Mortgage Applications by Race and Ethnicity, City of Millbrae and Surrounding Cities, 2018-2019

	Racial / Ethic Group	Application approved but not accepted		Application denied		Application withdrawn by applicant		File closed for incompleteness		Loan originated	
Millbrae	American Indian or Alaska Native, Non-Hispanic	1	6%	0	0%	0	0%	1	2%	0	0%
	Asian / API, Non-Hispanic	7	39%	80	52%	46	45%	27	52%	318	57%
	Black or African American, Non-Hispanic	0	0%	1	1%	1	1%	0	0%	1	0%
	White, Non-Hispanic	6	33%	38	25%	24	24%	12	23%	142	25%
	Hispanic or Latinx	2	11%	9	6%	6	6%	4	8%	16	3%
	Unknown	2	11%	27	17%	25	25%	8	15%	85	15%
	Totals	**18**	**100%**	**155**	**100%**	**102**	**100%**	**52**	**100%**	**562**	**100%**
Burlingame	American Indian or Alaska Native, Non-Hispanic	0	0%	1	0%	0	0%	0	0%	1	0%
	Asian / API, Non-Hispanic	8	35%	60	30%	47	30%	8	19%	246	29%
	Black or African American, Non-Hispanic	0	0%	1	0%	1	1%	0	0%	2	0%
	White, Non-Hispanic	9	39%	93	46%	72	46%	24	56%	412	48%
	Hispanic or Latinx	2	9%	10	5%	3	2%	2	5%	24	3%
	Unknown	4	17%	36	18%	32	21%	9	21%	176	20%
	Totals	**23**	**100%**	**201**	**100%**	**155**	**100%**	**43**	**100%**	**861**	**100%**
Hillsborough	American Indian or Alaska Native, Non-Hispanic	0	0%	0	0%	1	1%	0	0%	1	0%
	Asian / API, Non-Hispanic	5	26%	44	37%	34	35%	13	36%	138	30%
	Black or African American, Non-Hispanic	1	5%	2	2%	1	1%	0	0%	2	0%
	White, Non-Hispanic	6	32%	48	40%	38	39%	13	36%	205	45%
	Hispanic or Latinx	1	5%	4	3%	2	2%	2	6%	6	1%
	Unknown	6	32%	22	18%	22	22%	8	22%	105	23%
	Totals	**19**	**100%**	**120**	**100%**	**98**	**100%**	**36**	**100%**	**457**	**100%**
San Bruno	American Indian or Alaska Native, Non-Hispanic	0	0%	3	1%	3	2%	1	1%	2	0%
	Asian / API, Non-Hispanic	16	47%	114	31%	60	31%	20	26%	402	37%
	Black or African American, Non-Hispanic	0	0%	8	2%	3	2%	1	1%	14	1%
	White, Non-Hispanic	10	29%	110	30%	64	33%	22	28%	357	33%
	Hispanic or Latinx	4	12%	62	17%	22	11%	10	13%	122	11%
	Unknown	4	12%	68	19%	40	21%	24	31%	182	17%
	Totals	**34**	**100%**	**365**	**100%**	**192**	**100%**	**78**	**100%**	**1,079**	**100%**
San Mateo	American Indian or Alaska Native, Non-Hispanic	0	0%	3	0%	2	0%	0	0%	8	0%
	Asian / API, Non-Hispanic	33	38%	195	29%	157	30%	44	27%	915	33%
	Black or African American, Non-Hispanic	1	1%	6	1%	2	0%	2	1%	26	1%
	White, Non-Hispanic	32	37%	260	38%	190	37%	62	38%	1,111	41%
	Hispanic or Latinx	5	6%	74	11%	38	7%	16	10%	152	6%
	Unknown	15	17%	140	21%	130	25%	38	23%	520	19%
	Totals	**86**	**100%**	**678**	**100%**	**519**	**100%**	**162**	**100%**	**2,732**	**100%**
South San Francisco	American Indian or Alaska Native, Non-Hispanic	0	0%	2	0%	1	0%	1	1%	4	0%
	Asian / API, Non-Hispanic	24	41%	220	47%	116	40%	57	46%	679	46%
	Black or African American, Non-Hispanic	0	0%	2	0%	4	1%	2	2%	13	1%
	White, Non-Hispanic	12	21%	88	19%	60	21%	25	20%	332	23%
	Hispanic or Latinx	10	17%	72	15%	36	13%	16	13%	188	13%
	Unknown	12	21%	85	18%	70	24%	24	19%	258	18%
	Totals	**58**	**100%**	**469**	**100%**	**287**	**100%**	**125**	**100%**	**1,474**	**100%**

Source: ABAG Housing Needs Data Workbook

Patterns and Trends

Settlement

Millbrae is similar to that of many California towns whereby an early settler sets up an agrarian enterprise on a Spanish land grant, and visionary settlers arrive and begin farming and building. Jose Antonio Sanchez arrived here following the "discovery" and sparse colonization of the San Francisco peninsula that had occurred after Gaspar de Portola's first viewing of the region from atop Sweeny Ridge in 1769. His son, Jose Antonio Sanchez Jr., gained the title of Rancho Buri, the huge rancho stretching from what is now South San Francisco to San Mateo. Upon his death in 1843, his sons Jose de la Cruz and Manuel became the primary inheritors of what is known today as Millbrae. Later in the 1800s, Chilean native Custodio Silva purchased 168 acres of what is now the area between Taylor Boulevard and Anita Avenue, stretching roughly from today's El Camino

Real to Skyline Boulevard. His family contributed much to the development of the area, providing properties for use by ranching operations and various farming concerns.

According to the Millbrae Historical Society, the City developed in the following patterns over the decades:

Before 1990: The Millbrae Villa (in the southern part of the City, extending from east to west) neighborhood was developed.

1900 – 1929: A few more neighborhoods, including Marino Vista, Millbrae Park, Capuchino No. 1-2, and Millbrae Highlands were developed in different parts of the City. Millbrae Highlands was established next to Millbrae Villa (just north of it), while others were scattered in the northern parts of the City.

1930 – 1949: Multiple neighborhoods were established, including Millbrae Manor (in the northern area of the City), Bayside Manor (in the southern part of the City, next to the San Francisco Airport), Lomita Hills (north of the Capuchino neighborhoods), and Millwood, and Meadow Glen (in the central areas of the City).

1950 – 1969: The western areas of the City began to develop, including Millbrae Meadows, Glenview Highlands, and a portion of the Silva Ranch Community. In addition, the Airport Park community (next to the central part of the San Francisco Airport), and Mills Estate (south of Millbrae Villa).

1970 – After 2000: Green Hills (in the western part of the City) and Millbrae Estates (in the eastern part of the City, next to Glenview Highlands) developed.

Historical settlement in the City has been influenced in part due to the geography of the City and its proximity adjacent to the San Francisco International Airport, on the east boundary of the City limits. **Desirable settlement in the City is often on the western, hillside, portions of the City, where many homes have expansive views of the bay and the San Bruno mountains.** Lot sizes of properties on the west side of the City are also often larger than properties closer to the eastern boundary. **As the eastern portions of the City are closer to the airport, airport noise is more apparent, which likely played a factor in residential settlement over time.**

Historical Land Use

The City of Millbrae's development is largely characterized by a mix of residential, commercial, and industrial land uses. The eastern parts of the City are primarily made up of low-density residential. Meanwhile, the areas near El Camino Real and east of it include a variety of medium to high-density residential, along with the mixed-use areas near Millbrae Station and El Camino Real. This was a result of the City's adoption of two specific plans to accommodate the increased population after the construction of the Millbrae BART station in the 1970s, which provided access to the San Francisco Bay Area Rapid Transit system and increased desirability of the City as a place to live and work. **Through the adoption of the specific plans, the City is making an**

active effort to increase density and facilitate development in the area of the City with the highest access to jobs and services.

The City's 2040 General Plan identifies zoning designations that permit a variety of housing types, including single-family homes, apartments, and mixed-use development. However, the City has historically had limited affordable housing options, with a small portion of the City's housing stock designated as affordable. The General Plan identifies a need to increase the supply of affordable housing and diversify housing options in the City. To address the affordable housing needs of the Millbrae community, the City of Millbrae has taken several local initiatives to promote affordable housing development in the City. These initiatives include the adoption of an inclusionary housing ordinance and the creation of a housing trust fund, which provides funding for affordable housing initiatives. The City has also explored partnerships with local developers and non-profit organizations to support affordable housing development. Furthermore, Chapter 8, Housing Plan, includes at least 14 programs to increase the availability of affordable housing.

Neighborhood Patterns

As described throughout this section, **the northern and eastern areas of the City** experience more overcrowding, environmental hazards, risk of displacement, and cost burdens, among others:

- **Median Income & Cost Burden -** Renters and owners experiencing cost burden are primarily concentrated in the north and east (including the area east of the El Camino Real Corridor) areas of the City, adjacent to the City of San Bruno and the San Francisco Airport (Figure IV-17 and IV-18). In addition, these areas also have lower median incomes than the rest of the City. Specifically, the northern and eastern areas of the City have a median income between $87,100 (HCD 2020 State Median Income) and $125,000 (Figure II-28). This compares to the rest of the City, which has a median household income greater than $125,000.

- **Overcrowding -** The census tract adjacent to the San Francisco Airport, which includes the area east of the El Camino Real Corridor, has a share of overcrowded households that is slightly higher than the State average of 8.2% (Figure IV-23). Nearly 100% of the Site Inventory sites are in that census tract, which will provide additional affordable housing in the portions of the City where it is most needed.

- **Substandard Housing –** The City performed a windshield survey in the Millbrae neighborhood east of El Camino Real Corridor. This neighborhood has been historically disadvantaged relative to the rest of the City and has had several issues over the years such as flooding, neglected parks, lack of sidewalks on several blocks, and a general lack of investment. Still, the City found that over 99% of the 600 residential parcels surveyed presented no visible signs of overdue maintenance or minor damage to the residential structure. The survey did, however, identify 25 parcels, less than 1% of the residential structures surveyed, showing signs of deterioration, dilapidation, and/or unsafe

conditions. The conditions observed included: damaged siding or stucco, damaged fences, damaged garage doors, broken room windows, damaged roofs, and broken garage door windows.

- **Displacement -** According to the Urban Displacement Project, four census tracts in the City are vulnerable to displacement and represent 76.4% of the total City population (ACS 2020 Five-Year Estimates). These same tracts have lower median incomes, lower environmental outcomes, and higher rates of housing cost burden (Figure IV-32, IV-33, and IV-34). Nearly 100% of the Sites Inventory Sites are located within these vulnerable tracts. Additionally, some areas of the City along San Francisco Bay are included in the Special Flood Hazard Areas (Figure IV-35).

- **Environmental Conditions –** The neighborhood east of the El Camino Real Corridor, adjacent to the San Francisco Airport, has the least positive environmental outcomes. These areas scored in the lowest percentile rank (less than 0.25) according to the TCAC Opportunity Areas Environmental Score (Figure III-12), which indicates a higher exposure to pollution burden and population characteristics. These areas have a low TCAC Opportunity Areas Environmental Score due to exposure to diesel particulate matter from the San Francisco Airport. In addition, a portion of the neighborhood east of El Camino Real is located within a flood zone (Figure IV-35) and is adjacent to sensitive habitat for protected species.

- **Mobility Access and Transportation -** The two neighborhoods on Millbrae's east side are physically separated from the rest of the City by the BART and Caltrain tracks. Center Street is currently the only vehicular access point to one of the two neighborhoods and is constrained by an at-grade railroad crossing, making it difficult for residents to get in and out of their neighborhood. While the area east of the El Camino Real Corridor has good access to the El Camino Real SamTrans stops, access to the Millbrae Intermodal Station can be inconvenient for residents in the Bayside Manor and Marina Vista neighborhoods due to the inaccessibility of the Station via Aviador avenue. (Figure III-11).

- **Job Access -** HUD's job proximity index shows the eastern areas of the City have a score of more than 80, whereas western areas score between 40 and 60. This score is based on a scale from zero to 100 where 100 is the closest proximity to jobs. Eastern Millbrae is adjacent to the San Francisco Airport and the City of Burlingame, which has a job-to-household ratio over two—higher than the County average. The recently opened Gateway development, adjacent to Millbrae Station, includes over 150,000 square feet of office space, as well as ground-floor commercial space throughout the development. There are also two life science projects currently under construction just south of Millbrae Station, which will provide job opportunities in the research and development field.

- **Quality of Education -** According to TCAC's educational score, all census tracts in the City east score higher than 0.50, with two census tracts scoring above 0.75 (Figure III-

2).Opportunity scores are presented on a scale from zero to one, and the higher the number, the more positive the education outcomes. TCAC's education score is based on math proficiency, reading proficiency, high school graduation rates, and the student poverty rate.

As discussed in this section, residents of the northern and eastern areas of the City experience the highest number of housing-related impacts and merit the City's attention. To help mitigate these conditions, the City is focusing on new, affordable housing development in these areas to decrease cost burden, overcrowding, substandard housing, and displacement. In addition, the City is increasing its efforts to address any conditions limiting access to opportunities for residents of the northern and eastern portions of the City. As such, Chapter 8, Housing Plan, of this Housing Element includes the following policies and programs to help address disparities and improve the quality of life in the least advantaged communities in Millbrae:

- **Policy H4.3: Employ Strategies for Neighborhood and Infrastructure Improvements.** Seek out the improvement of less affluent communities in the City to create opportunities within all neighborhoods.

- **Program HIP-55: Eastside Specific Plan Development.** The City shall develop a comprehensive Eastside Specific Plan that examines opportunities and constraints for infrastructure, circulation, and land use. The specific plan shall include the development of a concept plan containing an infrastructure and needs assessment and a conceptual land use plan.

Historical Local Governmental Actions (Economic Development, Redevelopment, Affordable Housing)

Redevelopment Dissolution – Impacts on Economic Development and Affordable Housing Efforts

The City Council established the Millbrae Redevelopment Project Area and approved the Redevelopment Plan for the Millbrae Redevelopment Project in 1988. According to the tax increment projections contained in the Official Statement for the 2015 Tax Allocation Refunding Bond issued by the Successor Agency to the former Millbrae Redevelopment Agency, the Millbrae Redevelopment Project would have generated a total of $5.5 to $7.6 million annually in net tax increment until the expiration in 2035. Of this net increment, between $3.6 and $5.1 million annually could be spent on economic development activities to attract development and jobs to the City and fund needed infrastructure. Additionally, between $1.9 million and $2.5 million annually would be required to be set aside for affordable housing revenues over the 6th Cycle planning period. These funds could have been used to fund a variety of actions to lead to increased affordable housing development, such as funding predevelopment activities as the market rate developer stakeholder meeting notes indicate was a request from developers.

However, State law in 2011 dissolved redevelopment and this significant funding source has been lost. Despite State efforts to provide annual grants and other programs, these sources are not a

guaranteed stream of income that is needed to build more affordable housing in the State. It was also common practice for a redevelopment agency to issue bonds for affordable housing projects secured with the annual stream of tax increment revenue. However, Redevelopment Dissolution in 2011 removed this funding source for affordable housing and left the City with very limited local resources or funding to provide affordable housing to the community.

The City does have an inclusionary housing ordinance and commercial linkage in-lieu fee that has helped create affordable units since Redevelopment Dissolution. Additionally, since the establishment of statewide density bonuses several years ago, several residential projects have been developed that include affordable units.

Economic Development Plan

The City adopted an Economic Development Plan in 2013 with the following goals and objectives that relate to attracting businesses and jobs to the City as well as streamlining development:

- **Goals**
    - Maximize the City's regional role and perception as a major transportation center.
    - Aggressively pursue all avenues of growth for new and existing businesses.
- **Objectives**
    - Job diversification
    - Business retention and expansion
    - Improved development processing

The City has actively implemented the Plan, with both the Millbrae Station (adopted) and Downtown El Camino Specific Plan (in the process – expected adoption in December 2022) as well as other zoning changes in the downtown core area to encourage development near the BART station. One significant economic development accomplishment is the Gateway at Millbrae Station project, a $400 million project including 300 market-rate homes, 100 below-market-rate homes, a 164-room hotel, 150,000 square feet of office space, and 45,000 square feet of retail, all beside the Millbrae Station. Additionally, a life sciences campus will be developed across from Millbrae Station. These projects are anticipated to create ___ direct jobs and additional indirect and induced jobs that will have a domino effect of providing a wide array of employment opportunities in the community.

Section V. Site Inventory Analysis

AB 686 requires an analysis of sites identified to meet RHNA obligations for their ability to affirmatively further fair housing. The locations of the sites in the Sites Inventory identified by their unit's proposed income level(s) can be seen in Figure IV-39. The map shows that almost all sites are located in the City's downtown area along El Camino Real providing excellent access to transportation throughout Millbrae and San Mateo County. The distribution of income levels is

fairly diverse throughout the groupings. A more detailed breakdown of the sites and their proposed units can be found in Chapter 7, Sites Inventory of the Housing Element.

As seen in Figures II-30 and II-31, there are no R/ECAPs or Edge R/ECAPs within or around the City of Millbrae. There are also no RCAAs within the City of Millbrae. Therefore, no Sites Inventory Sites are located within RCAAs as seen in Figure IV-40.

Figure IV-41 depicts the lower income sites and clearly shows that none of the lower income sites are within R/ECAPs, Edge R/ECAPs, RCAAs, and SB535 Disadvantaged Communities. This map also details transit opportunities for these sites. As shown, these factors do not negatively affect the lower-income sites in the Sites Inventory. A detailed analysis of environmental and other issues impacting fair housing (including Millbrae's proximity to SFO and other fair housing issues). These analyses also apply to the location of the lower-income sites.

The City of Millbrae does not have a large proportion of low- and very low-income units located in the area. Figure I-7 shows that tracts that make up the entire City with less than 5% of households using Housing Choice Vouchers or where there is not enough data to determine the percentage. However, the Sites Inventory provides sufficient sites to meet the very low, low, moderate, and above moderate RHNA to address housing needs for all economic segments of the community. Additionally, as detailed in Chapter 7, there is substantial evidence that redevelopment to residential uses will occur during the planning period for all sites regardless of income level.

The location of the Sites Inventory sites is demonstrated to be in high/highest resource areas for economic outcomes and education, proximity to substantial transit choices and jobs, and provide overall access to positive social and economic outcomes, including:

- **While the majority of the City of Millbrae is located in the Highest or High resource tracts, the area east of Magnolia Avenue is considered a moderate resource area, according to TCAC's Opportunity Areas Composite Score map (Figure III-18). All of the Sites Inventory units are located in tracts with above-average education outcomes on the TCAC Opportunity Areas Education Score (Figure IV-42). This will address the fair housing finding related to lower educational outcomes.**
- **100% of Sites Inventory sites are located in tracts with above-average economic outcomes on the TCAC Opportunity Areas Economic Score** (Figure IV-43). **This will address the fair housing finding related to higher unemployment for persons with disabilities.**
- While some tracts within Millbrae have low CDC Social Vulnerability Scores, **nearly 100% of the site inventory units are located in tracts with mid-level vulnerability scores** (Figure IV-44). **However, Programs HIP-1, 3, 15-16, 21, 23-24, 31-33, 35-37, and 42 to facilitate and encourage the development of very low-, low- and moderate-income housing will address the fair housing finding of displacement risk, in addition to Program HIP-28 facilitates residents' access to resources.**

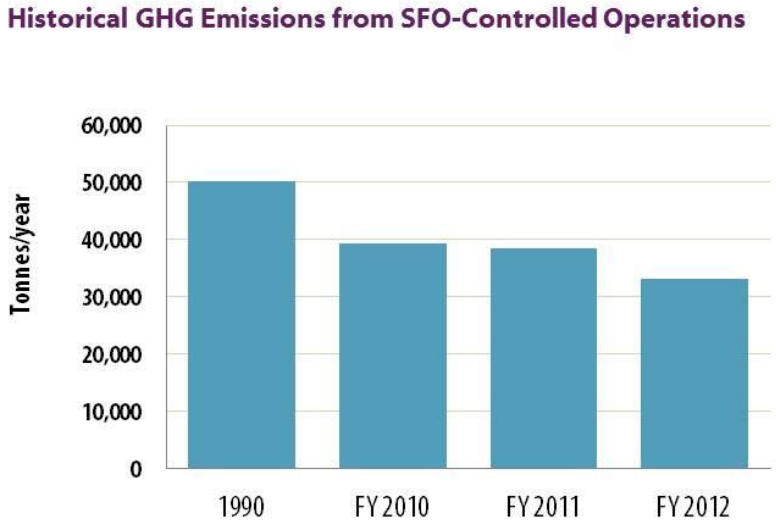
- **Nearly 100% of units in the Sites Inventory are located within block groups that score in the top or above average percentiles for HUD's Jobs Proximity Index** (Figure IV-45). **This will address the fair housing finding related to higher unemployment for persons with disabilities.**
- **The entire City of Millbrae scores highly on HCD's Healthy Places Index** as seen in Figure IV-46.
- **While the City of Millbrae does not have a large amount of Special Flood Hazard Areas within the City, areas along the coast of the bay to the City's east are located in Flood Hazard Areas.** The Sites Inventory site's proximity to Special Flood Hazard Areas can be seen in Figure IV-47 and there are five sites within these zones, three of which have a majority of land area within the Special Flood Hazard Area. It is important to note that two of these three sites have pipeline residential projects proposed on the site, demonstrating the feasibility of residential development within these Areas with mitigation measures. Additionally, State law and the HCD Site Inventory Guidebook dictate that the following must be considered in weighing and determining appropriate sites:
- **According to State law requirements and the HCD Site Inventory Guidebook, non-vacant properties designated with lower-income units must demonstrate redevelopment potential to be included in the site inventory**. It is important to note that sites, including lower-income sites, were identified under this requirement. **The evidence provided in Chapter 7, Adequate Sites Inventory Analysis and Methodology, of this Housing Element shows that the highest redevelopment potential exists for properties within the Downtown area**.
- The sites are generally located in the Downtown area of the City which is close to high-frequency transit, goods and services, jobs, and schools which **aligns with the State's 2025 Assessment which emphasizes that locating housing (including affordable housing) near transit and job centers is an important policy and implementation strategy**. Excerpts that highlight this point are provided below along with page number references.
    - "Land use policies and planning can help encourage greater supply and affordability as well as influence the type and location of housing. Thoughtful land use policies and planning can translate into the ability for families to access neighborhoods of opportunity, with high-performing schools, greater availability of jobs that afford entry to the middle class, and convenient access to transit and services. Easy access to jobs and amenities reduces a household's daily commute and other travel demands. Encouraging new homes in already developed areas and areas of opportunity not only alleviates the housing crisis but also supports the State's climate change and equity goals" (page 3).

- **Housing for persons with disabilities "could greatly benefit from access to transit options"** (page 12). ***This was identified as a fair housing finding in this AFFH, therefore housing near transit options is a high priority for the location of sites.***
- The Center for Neighborhood Technology developed the Housing and Transportation Affordability Index shows "lower overall cost burdens aligning with more transit-accessible areas" (page 33).
- "State housing and planning law encourage housing development that also helps the State meet its sustainability goals (developing inward and more compactly, close to jobs, transit, and services), and encourages the development of housing that is affordable to Californians at a range of income levels" (page 36).
- "In urban and suburban areas, compact infill development at increased density is critical for addressing housing needs and using valuable, location-efficient land near transit and job centers" (page 43).
    - The location of the lower-income sites provides for higher scoring on Low-income Housing Tax Credits, the largest single funding source for affordable housing that exists today.
- Nearly 100% of sites score low on CalEnviroScreen mainly due to diesel particulate matter from the SFO. However, the City and other regional agencies have developed and are implementing numerous programs and initiatives to improve air quality around SFO. These efforts are summarized below.
    - According to the SFO website, SFO implements the following to mitigate and manage emissions locally to improve air quality:

- SFO has developed a comprehensive greenhouse gas (GHG) emissions reduction program to meet the City and County of San Francisco's goal of reducing GHG emissions to 40% below 1990 levels by 2025. SFO is firmly committed to meeting this goal, having reduced its GHG emission level to 34% below 1990 emission levels in FY 2012.
    - Includes initiatives to enhance the Airport's energy efficiency, as well as increase its use of renewable energy and clean fuels. In addition to decreasing its directly controlled emissions, SFO has implemented several voluntary GHG mitigation measures that reduced the emissions from SFO enterprises by 69,775 metric tons in FY 2012. SFO also offset the baseline GHG emissions by 2,948 metric tons in FY 2012.

    - Historical GHG Emissions from SFO-Controlled Operations – the graphic above shows SFO-controlled GHG emissions for 1990, and FY 2010 through FY 2012. The Airport has reduced its emission level to 34% below the 1990 emission level.

- Title 5 Permit – As a major facility, SFO monitors emissions and makes regular reports to BAAQMD to ensure compliance with federal, State, and local air quality requirements.



  - SFO Climate Action Plan – SFO manages greenhouse gas emissions (GHG) as part of its Strategic Plan – targeting 50% GHG emissions reduction by 2021 (from a 1990 baseline)– and annual Climate Action Plan. Through these activities, such as building and transportation electrification, **SFO is working to slow climate change and improve air quality, through the co-reduction of fine particulate matter (PM2.5) and more**.
  - Annual Reporting – SFO prepares Plans and Reports that document our Airport's progress in achieving key outcomes for our environment, workforce, and community, including those that emphasize work in air quality and health.
  - Airport Development Plan (2016)
    - Includes strategic initiatives to upgrade the existing utility infrastructure to be more environmentally efficient and resilient to climate change. These initiatives include the SFO Sustainability and Zero Impact Objective Policies, SFO Climate Action Plan, and Carbon Neutrality Initiatives.

- The City's Climate Action Plan contains programs to mitigate and reduce greenhouse gas emissions to improve air quality and community health.
  - Taking inventory of GHG emissions following BAAQMD GHG Plan Level Quantification Guidance (dated May 2012), as well as the Local Government Operations Protocol.

- **Sustainable Communities Strategy/Regional Transportation Plan** - C/CAG is collaborating with local governments in San Mateo County as well as regional agencies to develop a Sustainable Communities Strategy (SCS) in compliance with the requirements of Senate Bill 375. The SCS will facilitate more focused development in priority development areas near public transit stations. The San Mateo County SCS aims to better integrate land use with public transportation to reduce GHG emissions. Issues monitored by C/CAG include transportation, air quality, stormwater runoff, hazardous waste, solid waste and recycling, climate change, land use near airports, abandoned vehicle abatement, and issues that affect the quality of life in general. C/CAG supports several sustainability initiatives including the following:
    - San Mateo County Energy Watch
    - Climate Ready San Mateo County
    - Congestion Management Agency
    - Sustainable Communities Strategy/Regional Transportation Plan.
- Specific plans (Millbrae Station and Downtown El Camino Real Corridor specific plans) surrounding and including the Millbrae Station transportation hub to reduce car use.
- Public Employee Commuting Program
- Clean Fleet Policy (city-owned vehicles)
- Programs HIP-16 and HIP-42 in the Housing Plan are focused on implementing the development of housing (including affordable housing) near transit options to lower vehicle miles traveled and ultimately improve air quality in the City.

- **Nearly 99% of sites are located near SamTrans stops** and within one mile of Millbrae Station as shown in Figure III-11. This will reduce vehicle miles traveled and GHG emissions, which will improve air quality and environmental scores in the City.
- **A high proportion of cost burdened households is identified in this AFFH**. **However, Programs HIP-1, 3, 15-16, 21, 23-24, 31-33, 35-37, and 42 in the Housing Plan include actions to encourage and facilitate affordable housing on the sites identified in this Housing Element, thereby reducing the proportion of cost-burdened households**.
- Overcrowding is identified in this AFFH and is a result of a lack of affordable housing. As stated above, Programs HIP-1, 3, 15-16, 21, 23-24, 31-33, 35-37, and 42 in the Housing Plan are targeted to increase the amount of affordable housing in the City to provide more housing choices so that residents will not need to "double up" to afford housing.

Concentration of Lower-Income Sites in the Downtown Area

Figure IV-39. Sites Inventory and Income Levels, illustrates the placement of all Housing Element Sites. As shown in this map, the majority of sites are found in the Downtown Area of the City, near transportation and services. HCD's Intersectional Policy Work webpage asserts the following regarding housing and transportation:

> *"After housing, transportation is the second-largest household expense... People who live near transit and job centers drive less, particularly lower-income residents. More recently, however, those areas have become less and less affordable. Housing near transit is in high demand, and rents and property values near transit are 10 to 20 percent higher on average than similar homes further from transit. Modeling and analysis by the Legislative Analyst's Office suggest that 'California's high housing costs cause workers to live further from where they work, likely because reasonably priced housing options are unavailable in locations nearer to where they work.' When households move further from job- and transit-rich areas to find more affordable homes, they encounter higher transportation costs and longer commutes. Beyond the quality-of-life consequences for individual households, longer commutes also increase greenhouse gas emissions and decrease productivity."*

As stated by HCD, lower-income households are especially vulnerable to displacement and higher housing cost burden. The increase in housing demand in the Bay Area, especially near transportation can force families to move further away from job centers and "over-commute," leading to increased transportation costs for an already-impacted portion of our community. Millbrae's plan for the development of affordable housing near the Downtown area provides lower-income families, who would be more vulnerable to extreme housing cost burden and displacement, with more opportunities to live near amenities, services, job centers, and transportation.

Prioritizing the City's available sites closest to transportation and job centers for lower-income families is an important goal of this Housing Element. However, the City also considers housing mobility to be an important element of helping the community thrive. The City has supported housing mobility and opportunity through the following actions:

- **State Density Bonus Law:** The state density bonus law allows developments that include substantial affordability (in any area of the City) to request density bonuses of up to 35%. These bonuses help generate more affordable housing and increase the competitiveness of the projects for state and federal programs.
- **Affordable Housing On-Site and In-Lieu Fee Requirements Ordinance:** The purpose of the Affordable Housing On-Site and In-Lieu Fee Requirement Ordinance is to establish requirements for the provision of inclusionary affordable housing designated as deed restricted for very low-, low-, and moderate-income households in conjunction with new development projects that include ten (10) or more new units in the City of Millbrae. These

requirements will mitigate the impacts of residential projects on the need for affordable housing by increasing the supply of affordable housing to a broad range of households with varying income levels within the City and will implement the Housing Element.

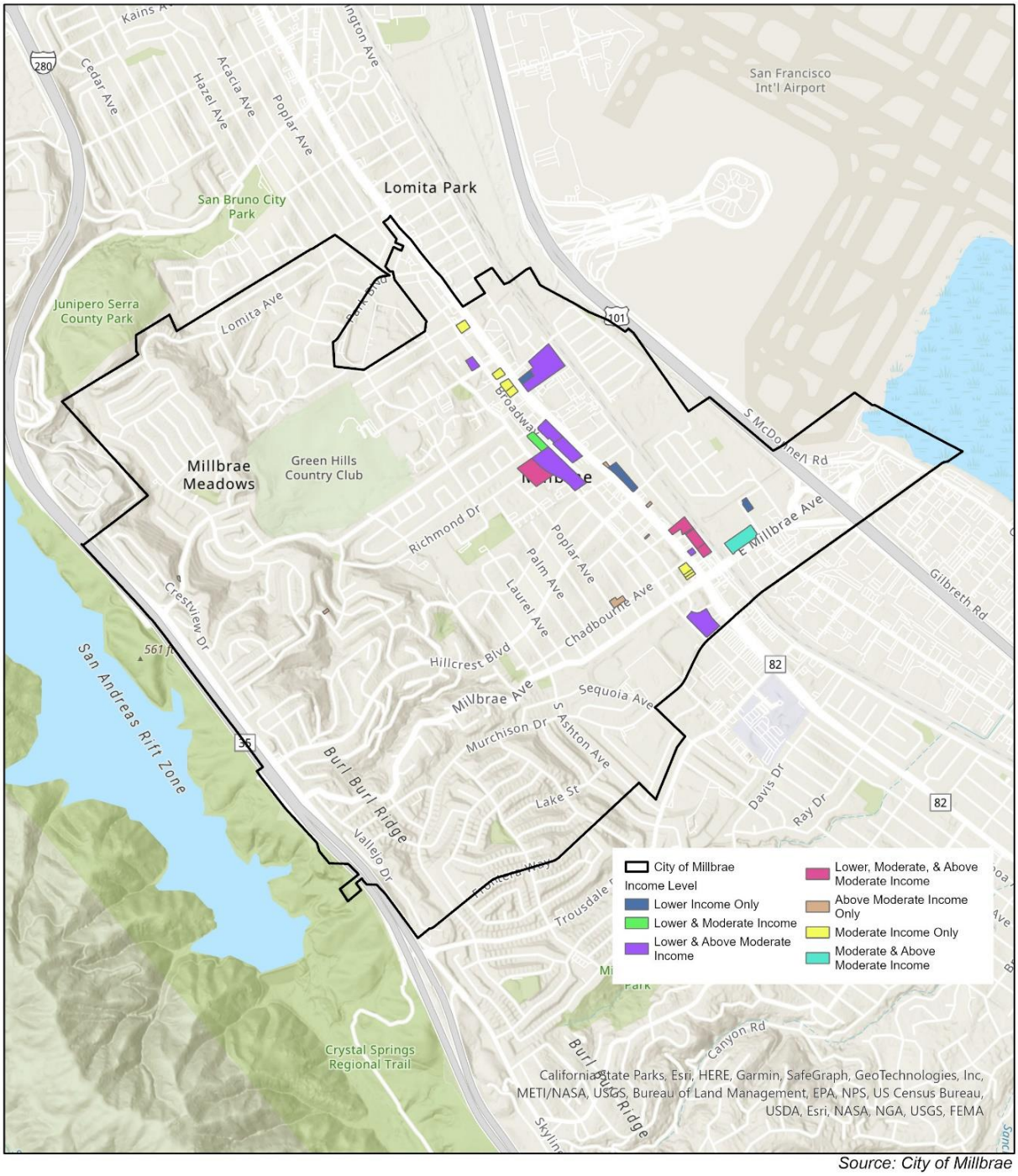
- **Affordable Housing Commercial Linkage Impact Fee Ordinance:** The purpose of the Affordable Housing Commercial Linkage Impact Fee Ordinance is to establish requirements for an affordable housing commercial linkage impact fee applicable to new commercial development projects to address the impacts of their projects on the demand for affordable housing by contributing to the supply of housing for households with very low, low, and moderate incomes. These requirements will increase the supply of affordable housing to a broad range of households with varying income levels within the City and will help implement the Housing Element by creating a fiscal mechanism to meet the demand for additional affordable housing created by new commercial development.
- **Up-zoning:** The City adopted the Downtown and El Camino Real Specific Plan and the Millbrae Station Area Specific Plan. Both specific plans increased the allowable densities and reduced development requirements, increasing allowable heights to increase the development of housing near transportation, jobs, and services.

While Millbrae has taken important steps to increase housing available throughout the City, the data and analysis presented in this section of the Housing Element indicate that the primary fair housing issue in Millbrae is a lack of housing choice and mobility caused by a lack of affordable housing. Furthermore, the general lack of affordable housing in the City contributes to the lack of housing choices and mobility. To address this ongoing issue, the Housing Plan contains 21 programs specifically targeted to encourage and facilitate the development of affordable housing units in the City. This effort will increase the number of affordable housing units and support access to resources such as housing choice vouchers, thereby alleviating the lack of housing choice and fostering greater housing mobility. To continue its efforts to increase housing mobility and affordability, the Housing Plan contains the following programs:

- **HIP-1.** Triennial Advocacy Meeting with Affordable Housing Property Owners/Managers, Fair Housing Providers, Service Providers, Housing Advocates, and Non-Profits
- **HIP-3.** Annual Meeting with San Mateo County Housing Authority and the San Mateo County Consortium to Identify Affordable Housing Opportunities
- **HIP-15.** Continue to Implement the Millbrae Station Area Specific Plan
- **HIP-16.** Downtown and El Camino Real Specific Plan Adoption and Implementation
- **HIP-21.** Services for Unhoused Persons
- **HIP-23.** Prioritize Review and Expedite Development of Affordable and Special Needs Projects
- **HIP-24.** Encourage and Facilitate Lot Consolidation

- **HIP-31.** Pursue State and Federal Funding for Affordable Housing
- **HIP-32.** Local Funding for Affordable Housing
- **HIP-33.** Allocate CDBG Funding for Housing
- **HIP-35.** Assist with Development of Lower-Income Housing
- **HIP-36.** Funding, Incentives, and Concessions for Extremely Low-Income Developments
- **HIP-37.** Advertise Available Resources
- **HIP-42.** Implement Reduced Parking for Affordable Housing
- **HIP-52.** Pilot City Mortgage Assistance Program
- **HIP-53.** Additional Density Bonus Incentives
- **HIP-54.** Allow Additional Affordable Housing in P-D Zones
- **HIP-55**. Housing Mobility
- **HIP-56.** Provide New Housing Choices in Lower-Density Neighborhoods Through Incentives for SB9 Units in R1-Zone Neighborhoods
- **HIP-57.** By-Right Approval on Reuse Sites
- **HIP-58.** Tools for Financing Infrastructure and Development

Figure V-39. Sites Inventory and Income Levels



Source: City of Millbrae

Harris & Associates

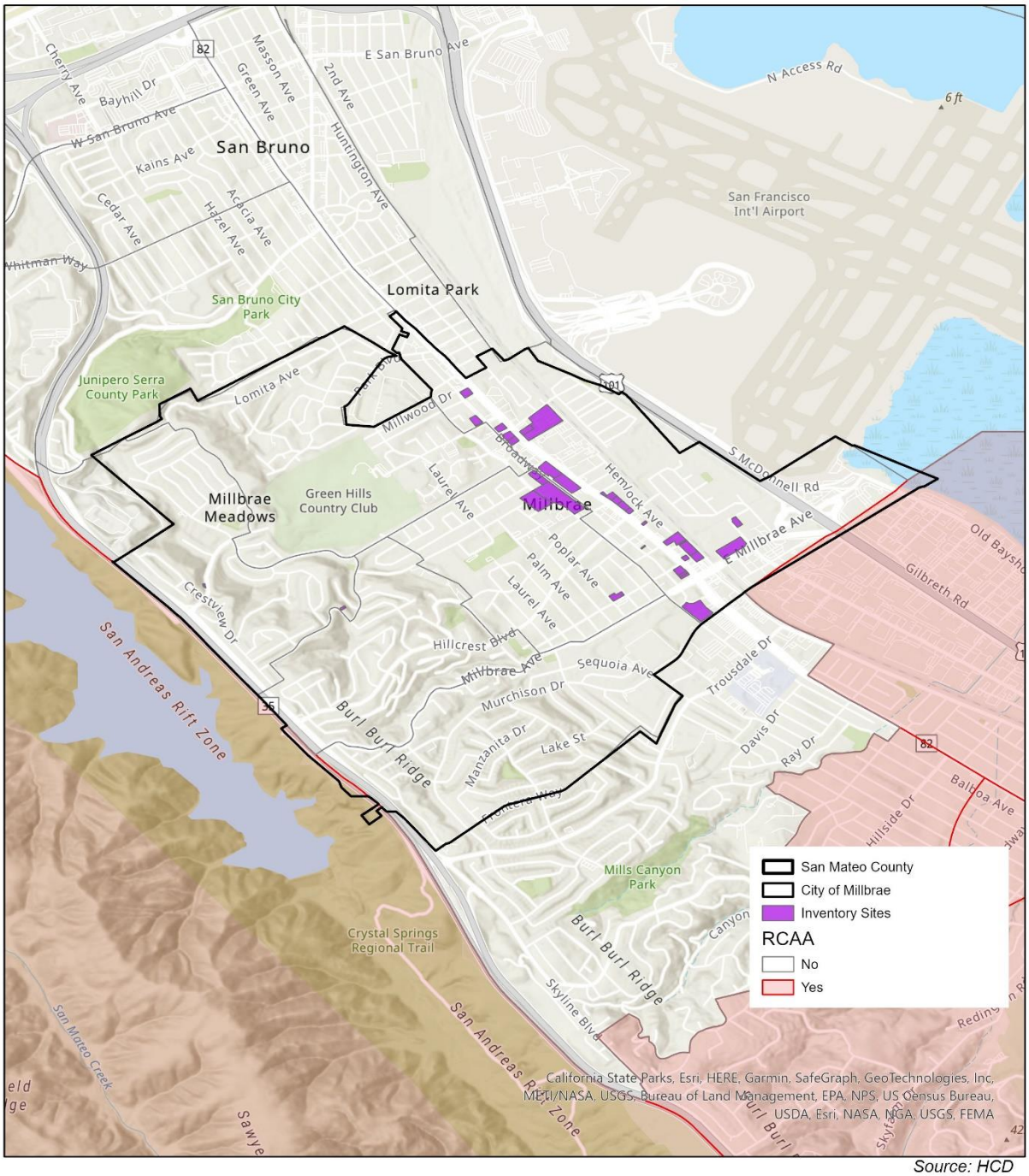
N

0 0.25 0.5 Miles

Sites Inventory Income Levels

City of Millbrae Affirmatively Furthering Fair Housing

Figure V-40. Racially Concentrated Areas of Affluence (RCAAs)



Source: HCD

Harris & Associates

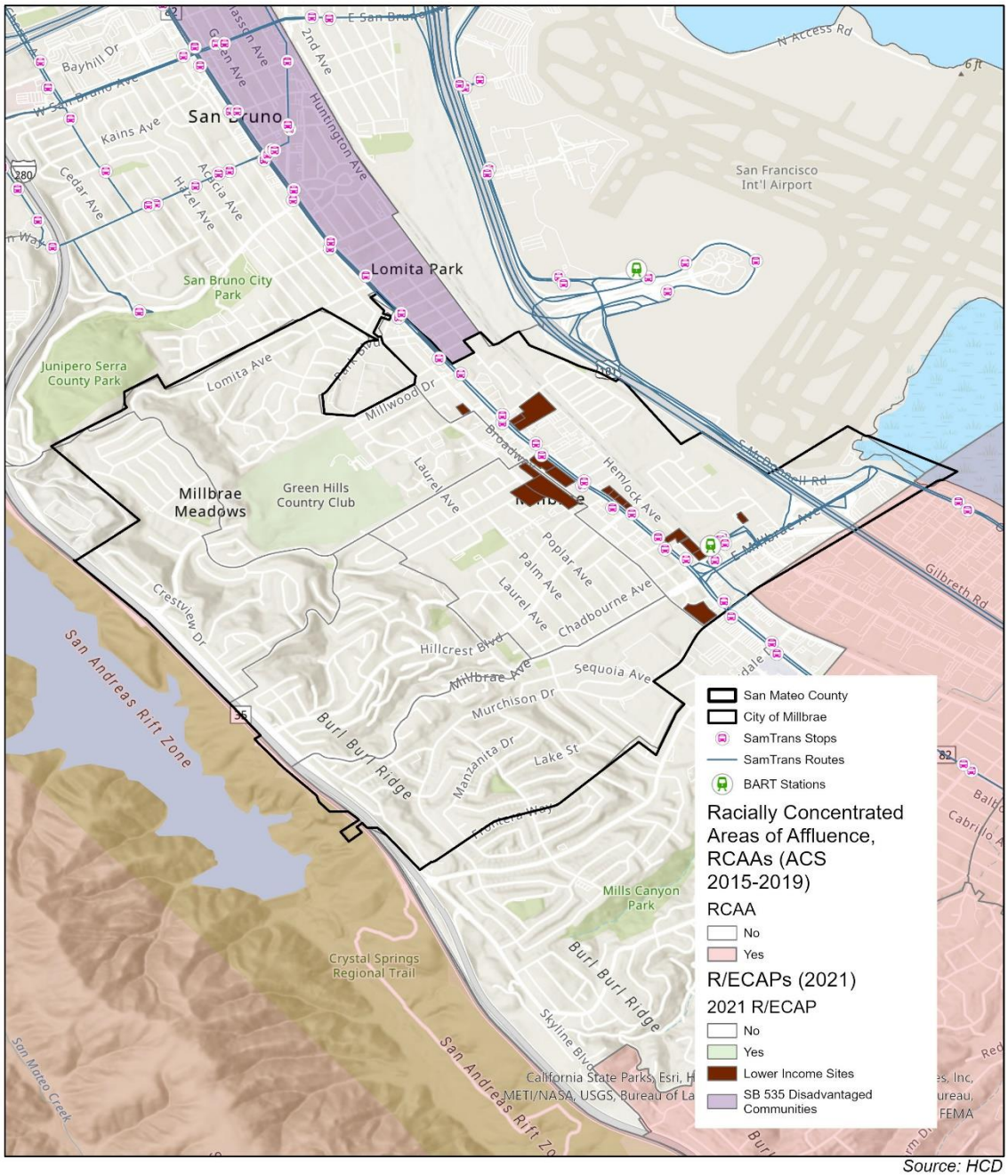
N

0 0.5 1 Miles

Sites Inventory and RCAAs

City of Millbrae Affirmatively Furthering Fair Housing

Figure V-41. Lower Income Site Distribution



Source: HCD

Harris & Associates

N

0 0.5 1 Miles

Lower Income Site Distribution

City of Millbrae Affirmatively Furthering Fair Housing

Figure V-42. Sites Inventory and TCAC Education Scores

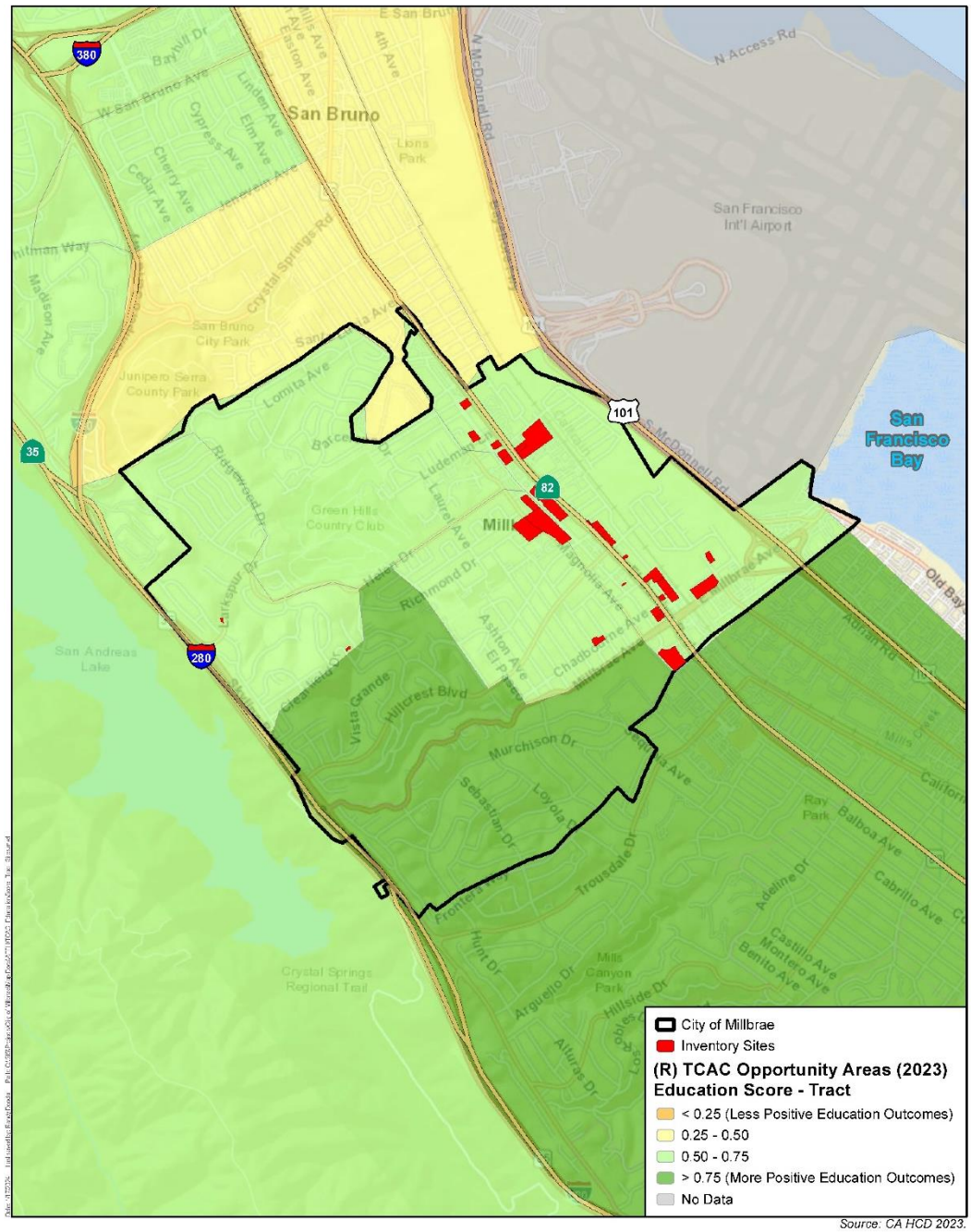


Figure V-43. Sites Inventory and TCAC Economic Scores

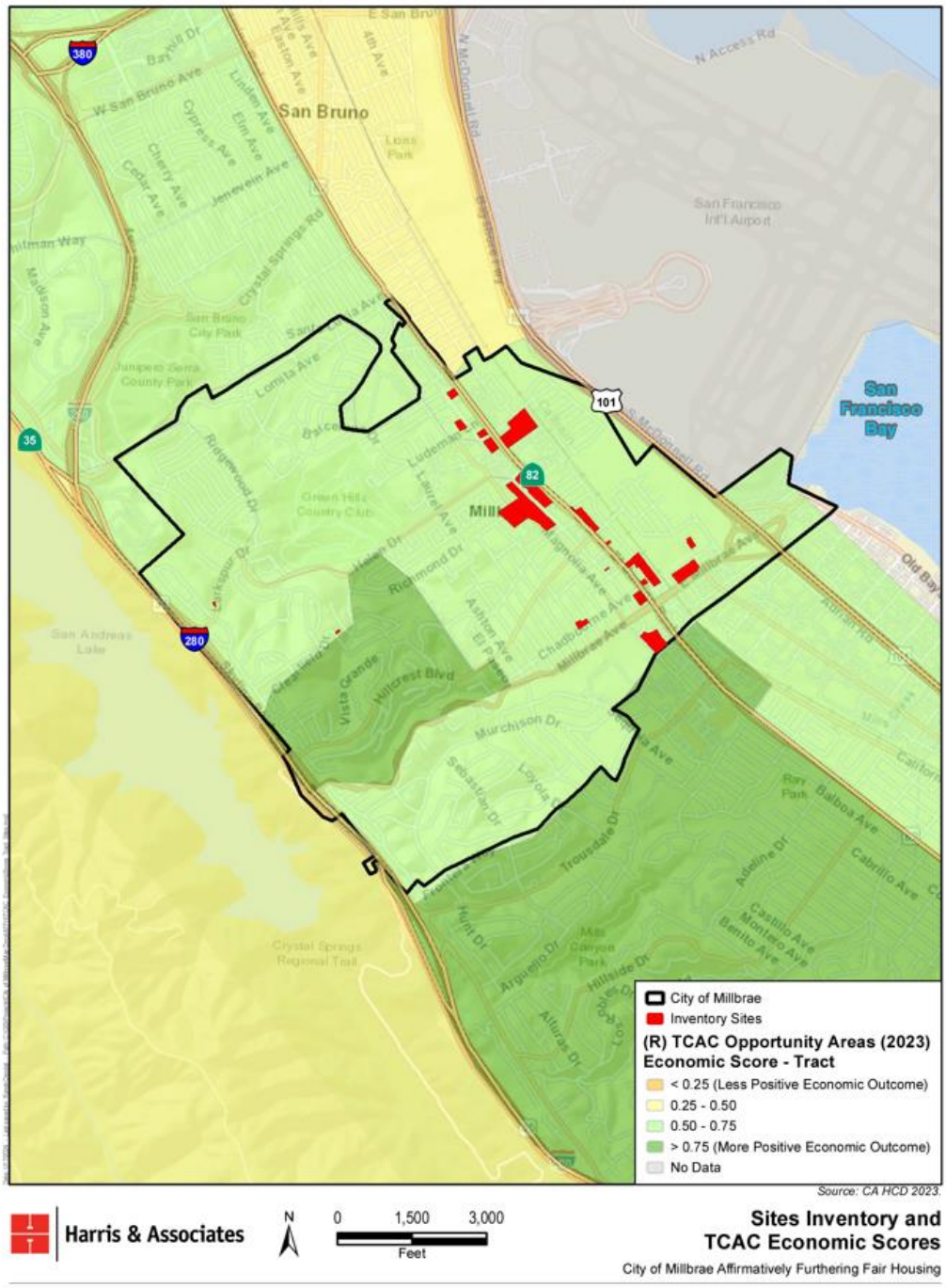
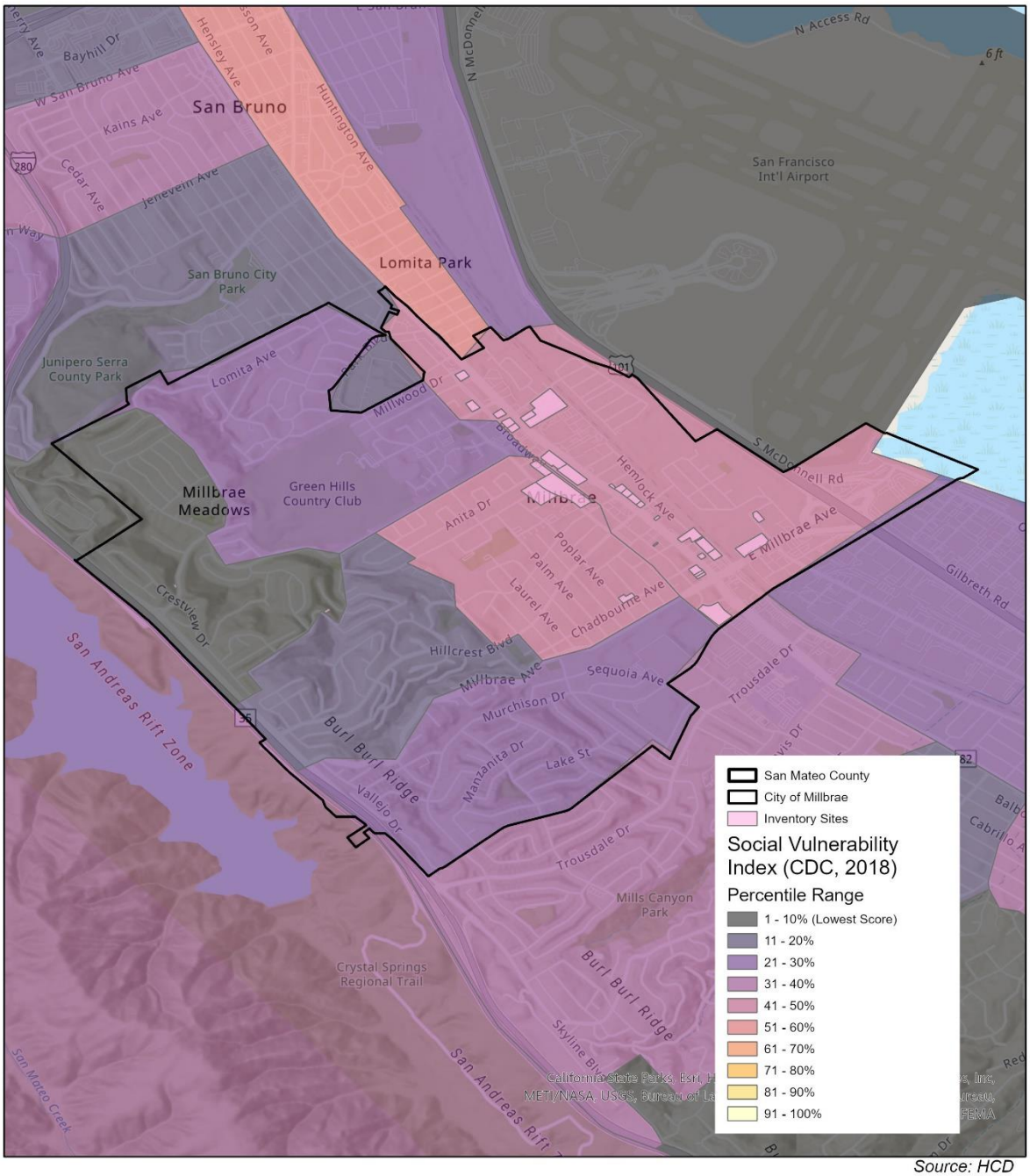


Figure V-44. Sites Inventory and Social Vulnerability



Source: HCD

Harris & Associates

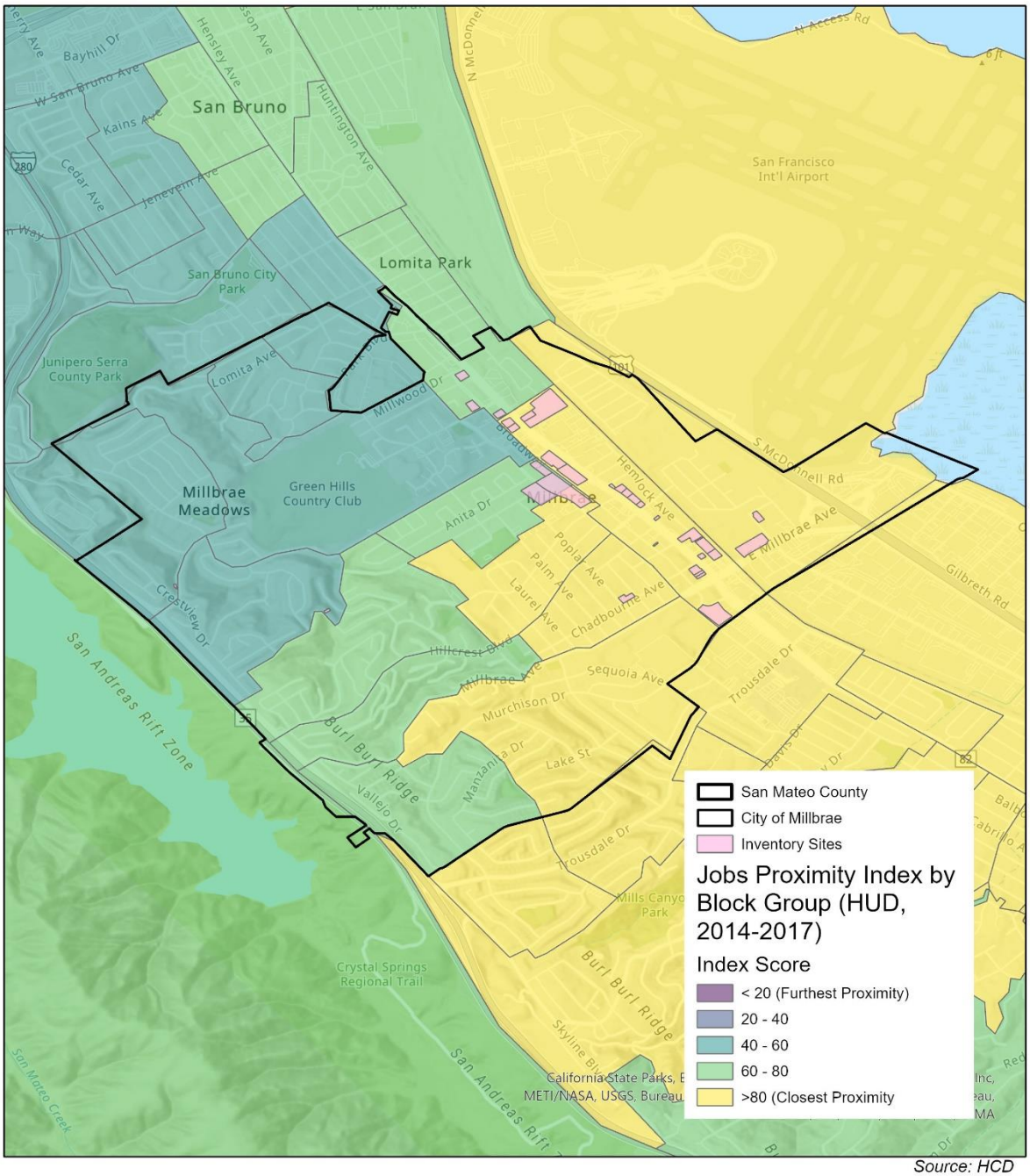
N

0 0.5 1 Miles

Sites Inventory and Social Vulnerability

City of Millbrae Affirmatively Furthering Fair Housing

Figure V-45. Sites Inventory and Jobs Proximity



Source: HCD

Harris & Associates

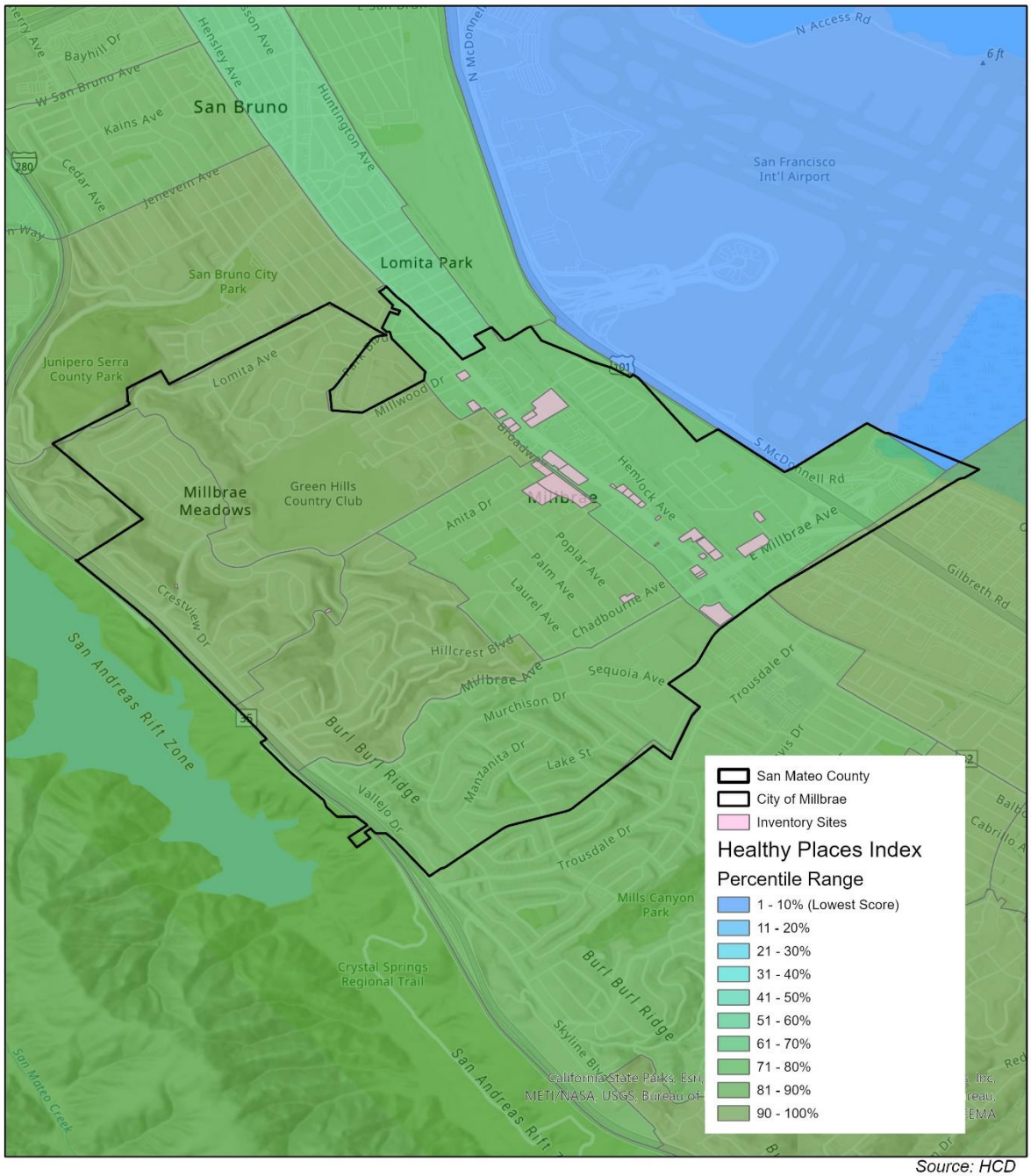
N

0 0.5 1 Miles

Sites Inventory and Jobs Proximity

City of Millbrae Affirmatively Furthering Fair Housing

Figure V-46. Sites Inventory and Healthy Places Index



Source: HCD

Harris & Associates

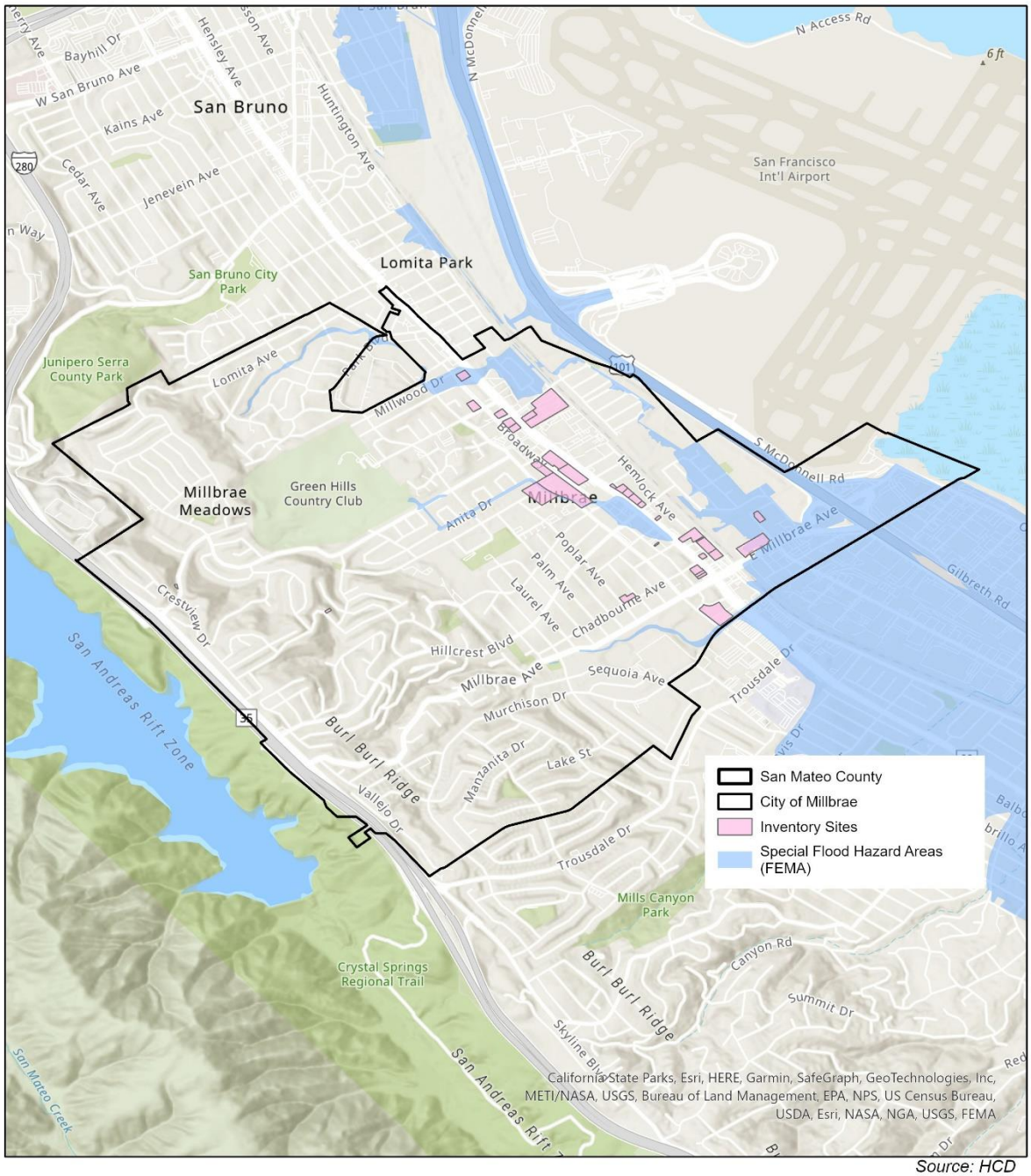
N

0 0.5 1 Miles

Sites Inventory and Healthy Places

City of Millbrae Affirmatively Furthering Fair Housing

Figure V-47. Sites Inventory and Special Flood Hazard Areas



Source: HCD

Harris & Associates

N

0 0.5 1 Miles

Sites Inventory and Special Flood Hazard Areas

City of Millbrae Affirmatively Furthering Fair Housing

Attachment A
Resident Survey Findings

Attachment B
Access to Education Supplement

21 Elements Resident Survey Analysis (San Mateo County)

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

The resident survey was available online, in both Spanish and English, in a format accessible to screen readers, and promoted through jurisdictional communications and social media and through partner networks. A total of 2,382 residents participated.

The survey instrument included questions about residents' current housing situation, housing, neighborhood and affordability challenges, healthy neighborhood indicators, access to opportunity, and experience with displacement and housing discrimination.

Explanation of terms. Throughout this section, several terms are used that require explanation.

- "Precariously housed" includes residents who are currently homeless or living in transitional or temporary/emergency housing, as well as residents who live with friends or family but are not themselves on the lease or property title. These residents may (or may not) make financial contributions to pay housing costs or contribute to the household in exchange for housing (e.g., childcare, healthcare services).
- "Disability" indicates that the respondent or a member of the respondent's household has a disability of some type—physical, mental, intellectual, developmental.
- "Single parent" are respondents living with their children only or with their children and other adults but not a spouse/partner.
- "Tenure" in the housing industry means rentership or ownership.
- "Large households" are considered those with five or more persons residing in a respective household.
- "Seriously Looked for Housing" includes touring or searching for homes or apartments, putting in applications or pursuing mortgage financing.

Sampling note. The survey respondents do not represent a random sample of the county or jurisdictions' population. A true random sample is a sample in which each individual in the population has an equal chance of being selected for the survey. The self-selected nature of the survey prevents the collection of a true random sample. Important insights and themes can still be gained from the survey results, however, with an understanding of the differences among resident groups and between jurisdictions and the county overall. Overall, the data provide a rich source of information about the county's households and their experience with housing choice and access to opportunity in the communities where they live.

Jurisdiction-level data are reported for cities with 50 responses or more. Response by jurisdiction and demographics are shown in the figure below. Overall, the survey received a very strong response from typically underrepresented residents including: people of color, renters, precariously housed residents, very low income households, households with children, large households, single parents, and residents with disabilities.

Figure 1.
Resident Survey Sample Sizes by Jurisdictions and Selected Characteristics

	County	Belmont	Brisbane	Burlingame	Daly City	East Palo Alto	Foster City	Half Moon Bay	Hillsborough	Milbrae	Pacifica	Redwood City	San Bruno	San Mateo	South San Francisco
Total Responses	**2,382**	**89**	**82**	**173**	**130**	**53**	**148**	**63**	**59**	**55**	**84**	**163**	**99**	**175**	**832**
Race/Ethnicity															
African American	134	5	7	4	9	8	10	6	4	4	5	14	4	17	15
Hispanic	397	7	9	14	26	27	13	8	1	8	12	59	13	31	149
Asian	500	18	9	26	43	6	32	6	8	13	14	11	19	23	249
Other Race	149	7	10	6	8	3	14	3	3	3	3	9	7	13	47
Non-Hispanic White	757	41	35	89	27	4	44	27	27	15	35	54	36	58	195
Tenure															
Homeowner	1,088	39	51	96	39	9	89	26	46	18	42	37	48	58	409
Renter	1,029	40	30	65	67	36	43	28	7	33	38	105	41	88	324
Precariously Housed	309	10	8	12	26	12	17	14	5	7	13	23	16	29	87
Income															
Less than $25,000	282	14	11	12	21	15	12	11	5	6	7	40	11	29	61
$25,000-$49,999	265	13	9	10	22	9	8	6	3	6	7	28	5	20	97
$50,000-$99,999	517	10	14	38	43	10	26	11	3	10	17	37	22	40	206
Above $100,000	721	38	24	69	16	8	64	12	30	14	32	31	40	40	251
Household Characteristics															
Children under 18	840	38	24	53	50	26	44	17	18	20	29	61	37	64	287
Large households	284	5	7	11	20	18	8	3	5	7	8	20	13	15	133
Single Parent	240	14	8	15	19	11	12	9	3	7	7	30	9	21	49
Disability	711	28	25	41	38	22	40	22	13	17	29	62	34	65	210
Older Adults (age 65+)	736	25	27	66	37	11	54	25	25	18	33	44	32	37	248

Note: Numbers do not aggregate either due to multiple responses or that respondents chose not to provide a response to all demographic and socioeconomic questions.

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Primary Findings

The survey data present a unique picture of the housing choices, challenges, needs, and access to economic opportunity of San Mateo County residents.

Top level findings from residents' perspectives and experiences:

- The **limited supply of housing** that accommodates voucher holders presents several challenges. Specifically,
    - Eight out of 10 voucher holders represented by the survey find a landlord that accepts a housing voucher to be "difficult" or "very difficult."
    - According to the survey data, vouchers not being enough to cover the places residents want to live is a top impediment for residents who want to move in San Mateo County, as well as for African American, Asian, and Hispanic residents, households with children under 18, single parents, older adults, households with a member experiencing a disability, and several jurisdictions.
- **Low income is a barrier** to accessing housing. The impacts are highest for precariously housed respondents. large households, Hispanic households, and residents in Daly City and Redwood City.
- **Nearly 4 in 10 respondents who looked for housing experienced denial of housing.** African American/Black respondents, single parent households, precariously housed respondents, and households with income below $50,000 reported the highest denial rates.
- **1 in 5 residents have been displaced** from their home in the past five years. One of the main reasons cited for displacement was *the rent increased more than I could pay*. African American households, single parents, households that make less than $25,000, and precariously housed respondents reported the highest rates of displacement.
- For households with children that were displaced in the past five years, **60% of children in those households have changed schools.** The most common outcomes identified by households with children who have changed schools include *school is more challenging, they feel less safe at the new school,* and *they are in a worse school.*
- **Nearly 1 in 5 residents reported they have experienced discrimination** in the past five years. African American, single parent, and precariously housed respondents reported the highest rates of discrimination. The most common actions

in response to discrimination cited by survey respondents were *Nothing/I wasn't sure what to do* and *Moved/found another place to live*.

- Of respondents reporting a disability, **about 25% report that their current housing situation does not meet their accessibility needs**. The three top greatest housing needs identified by respondents included installation of grab bars in bathroom or bench in shower, supportive services to help maintain housing, and ramps.

- On average, respondents are **fairly satisfied with their transportation situation**. Groups with the highest proportion of respondents somewhat or not at all satisfied with their transportation options included African American, single parents, precariously housed, and Brisbane respondents.

There are some housing, affordability, and neighborhood challenges unique to specific resident groups. These include:

- **Would like to move but can't afford it**—Most likely to be a challenge for Daly City, East Palo Alto, and Redwood City respondents, as well as Hispanic, renter, precariously housed, households making less than $50,000, and large household respondents.

- **My house or apartment isn't big enough for my family**—Most likely to be a challenge for East Palo Alto respondents, as well as Hispanic households, large and single parent households, and households with children under 18.

- **I'm often late on my rent payments**—Most likely to be a challenge for East Palo Alto and renter respondents, as well as households that make less than $25,000.

- **I can't keep up with my utility payments**—Most likely to be a challenge for East Palo Alto, Daly City, and San Mateo respondents, as well as African American and Hispanic respondents, single parent households, households with children under 18, and households that make less than $50,000.

- **Bus/rail does not go where I need to go or does not operate during the times I need**— Most likely to be a challenge for African American, precariously housed, single parent households, Brisbane and Pacifica respondents.

- **Schools in my neighborhood are poor quality**—Most likely to be a challenge for East Palo Alto, Redwood City, San Bruno and South San Francisco respondents, as well as Hispanic respondents and households with children under 18.

Resident Survey Findings

Of survey respondents who reported their race or ethnicity, nearly 40% of survey respondents identified as non-Hispanic White, followed by Asian (26%), Hispanic (20%), African American (7%), and Other Minority (8%) residents (Figure 2). Overall, 45% of the survey respondents were homeowners, followed by 42% of renter respondents. Thirteen percent of respondents reported they are precariously housed (Figure 3). Four in ten respondents reported having household income greater than $100,000. Nearly 30% of respondents reported a household income between $50,000-99,999, followed by 15% of respondents who made between $25,000-49,999 and 16% of respondents making less than $25,000 (Figure 4).

The survey analysis also included selected demographic characteristics of respondents, including those with children under the age of 18 residing in their household, adults over the age of 65, respondents whose household includes a member experiencing a disability, those who live in large households, and single parents. Thirty five percent of respondents indicated they had children in their household, while 31% indicated they were older adults. Thirty percent of respondents indicated they or a member of their household experienced a disability, 12% of respondents reported having large households, and 10% were single parents (Figure 5).

Figure 2. Survey Respondents by Race/Ethnicity

Note:

n=1,937; 535 respondents did not indicate their race or ethnicity.

Source:

Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

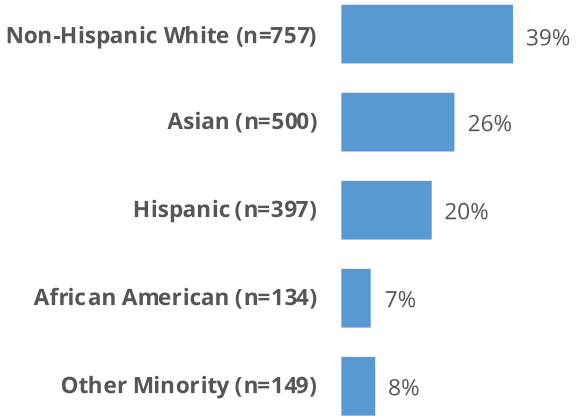


Figure 3. Survey Respondents by Tenure

Note:

n=2,426.

Source:

Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

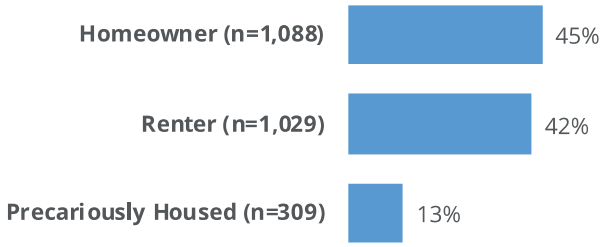


Figure 4. Survey Respondents by Income

Note:

n=1,785.

Source:

Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

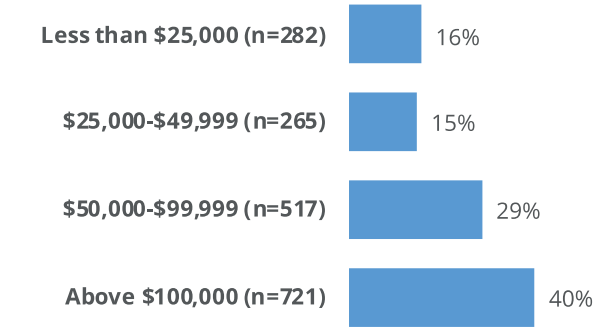


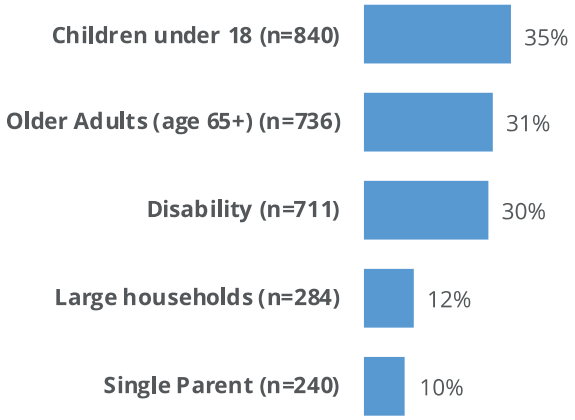
Figure 5. Survey Respondents by Selected Household Characteristics

Note:

Denominator is total responses to the survey (n=2,382)

Source:

Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.



Housing, Neighborhood and Affordability Challenges

Housing challenges: overall. Survey respondents were asked to select the housing challenges they currently experience from a list of 34 different housing, neighborhood, and affordability challenges. Figures 6a through 8c present the top 10 housing and neighborhood challenges and top 5 affordability challenges experienced by jurisdiction, race/ethnicity, tenure, income, and selected household characteristics.

These responses allow a way to compare the jurisdictions to the county for housing challenges for which other types of data do not exist. In this analysis, "above the county"—**shaded in light red or pink**—is defined as the proportion of responses that is 25% higher than the overall county proportion. "Below the county"—**shown in light blue**—occurs when the proportion of responses is 25% lower than the overall county proportion.

As shown in Figure 6a, residents in Redwood City and East Palo Alto experience several housing challenges at a higher rate than the county overall. Conversely, Foster City and Hillsborough residents experience nearly all identified housing challenges at a lower rate than the county.

Notable trends in housing, neighborhood, and affordability challenges by geographic area include:

- Residents in Daly City, East Palo Alto, and Redwood City are less likely to move due to the lack of available affordable housing options.
- East Palo Alto, Redwood City, and San Mateo residents report living in housing that is too small for their families.
- Millbrae, Belmont, and Redwood City residents report being more reticent to request a repair to their unit in fear that their landlord will raise their rent or evict them.
- Nearly 1 in 5 Pacifica survey respondents report that their home or apartment is in bad condition.

- Brisbane and East Palo Alto residents are more likely to experience a landlord refusing to make repairs to their unit.
- Residents in Daly City and Millbrae are more likely to report that they don't feel safe in their neighborhood or building.
- Half Moon Bay and East Palo Alto respondents expressed the greatest need for assistance in taking care of themselves or their home.

When compared to the county overall, **the most common areas where respondents' needs were higher than the county overall** were:

- Overall, half of the jurisdictions' respondents reported *I need help taking care of myself/my home and can't find or afford to hire someone* at a higher rate than the county.
- Over 40% of jurisdictions' respondents reported a higher rate than the county for the following housing challenge: *My home/apartment is in bad condition.*
- Nearly 40% of jurisdictions' respondents reported a higher rate than the county for the following housing challenges: *My landlord refuses to make repairs despite my requests* and *I don't feel safe in my neighborhood/building.*

Figure 6a.
Top 10 Housing Challenges Experienced by Jurisdiction

25% Above County average

25% Below County average

Housing or Neighborhood Condition	County	Belmont	Brisbane	Burlingame	Daly City	East Palo Alto	Foster City	Half Moon Bay	Hillsborough	Milbrae	Pacifica	Redwood City	San Bruno	San Mateo	South San Francisco
Valid cases	2,159	82	73	158	118	49	135	59	50	53	79	151	93	163	738
I would like to move but I can't afford anything that is available/income too low	31%	27%	12%	20%	51%	41%	16%	25%	4%	32%	28%	43%	30%	38%	35%
My house or apartment isn't big enough for my family	20%	22%	11%	14%	24%	35%	10%	12%	4%	21%	11%	26%	20%	26%	21%
I worry that if I request a repair it will result in a rent increase or eviction	14%	21%	10%	13%	17%	14%	9%	10%	2%	23%	15%	20%	11%	15%	13%
My home/apartment is in bad condition	11%	15%	14%	9%	15%	12%	3%	7%	0%	11%	18%	14%	5%	15%	10%
My landlord refuses to make repairs despite my requests	6%	6%	14%	3%	5%	12%	4%	5%	2%	2%	9%	9%	5%	10%	5%
I live too far from family/ friends/my community	6%	6%	5%	4%	8%	4%	5%	8%	6%	6%	3%	8%	4%	7%	5%
I don't feel safe in my building/ neighborhood	6%	7%	5%	5%	13%	8%	0%	7%	6%	11%	10%	8%	3%	6%	3%
I need help taking care of myself/my home and can't find or afford to hire someone	5%	2%	7%	7%	7%	10%	2%	14%	2%	8%	9%	3%	4%	8%	4%
I have bed bugs/insects or rodent infestation	5%	10%	5%	4%	3%	16%	2%	3%	4%	6%	9%	11%	6%	4%	3%
The HOA in my neighborhood won't let me make changes to my house or property	4%	2%	5%	1%	3%	8%	11%	3%	2%	4%	5%	3%	3%	4%	2%
None of the above	42%	37%	48%	50%	20%	33%	55%	44%	76%	36%	47%	28%	45%	35%	46%

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

The following two figures segment the answers by:

- Housing affordability challenges only; and
- Neighborhood challenges only.

Housing affordability challenges. As shown in Figure 6b, residents in San Mateo, Daly City, East Palo Alto, and Pacifica experience affordability challenges at a higher rate than the county overall. Conversely, Belmont, Hillsborough, Burlingame, and South San Francisco residents experience affordability challenges at a lower rate than the county.

The most significant geographic variations occur in:

- San Mateo city residents experience all five affordability challenges at a greater rate than the county overall. In addition to being less likely to pay utility bills or rent on time, San Mateo residents are more than twice as likely than the average county respondent to have bad credit or a history of eviction/foreclosure that impacts their ability to rent.
- East Palo Alto, San Mateo, and Daly City residents are most likely to experience difficulty paying utility bills.
- Residents in East Palo Alto and Redwood City are most likely to be late on their rent payments.
- Millbrae residents experience the greatest difficultly paying their property taxes among jurisdictions in San Mateo County.
- Respondents from Brisbane, Half Moon Bay, and Pacifica are also more likely to have trouble keeping up with property taxes.
- Daly City, City of San Mateo, and Redwood City respondents are more likely to have bad credit or an eviction history impacting their ability to rent.

Overall, over a third of jurisdictions' respondents experienced the following affordability challenges at a higher rate than the county: *I can't keep up with my property taxes* and *I have bad credit/history of evictions/foreclosure and cannot find a place to rent*.

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Figure 6b.
Top 5 Affordability Challenges Experienced by Jurisdiction

25% Above County average

25% Below County average

Affordability Challenges	County	Belmont	Brisbane	Burlingame	Daly City	East Palo Alto	Foster City	Half Moon Bay	Hillsborough	Milbrae	Pacifica	Redwood City	San Bruno	San Mateo	South San Francisco
Valid cases	2,130	83	73	157	115	51	134	58	50	50	77	147	93	160	728
I can't keep up with my utilities	10%	6%	5%	6%	15%	16%	5%	12%	4%	12%	8%	12%	9%	15%	9%
I'm often late on my rent payments	8%	6%	5%	6%	10%	20%	3%	7%	2%	8%	4%	12%	4%	11%	7%
I can't keep up with my property taxes	6%	2%	10%	4%	3%	2%	8%	10%	0%	16%	10%	3%	5%	9%	5%
I have bad credit/history of evictions/foreclosure and cannot find a place to rent	4%	1%	4%	2%	13%	6%	0%	0%	2%	0%	5%	8%	4%	10%	2%
I have Section 8 and I am worried my landlord will raise my rent higher than my voucher payment	4%	2%	7%	3%	3%	2%	7%	3%	4%	4%	5%	3%	3%	6%	2%
None of the above	73%	73%	68%	80%	65%	59%	78%	66%	88%	64%	71%	70%	77%	63%	80%

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Neighborhood challenges. As shown in Figure 6c, residents in East Palo Alto, Brisbane, Daly City, and Pacifica experience neighborhood challenges at a higher rate than the county. Burlingame and Foster City both experience neighborhood challenges at a lower rate than the county.

Hillsborough and Belmont residents report divergent experiences related to neighborhood challenges — respondents identified more challenges around neighborhood infrastructure and access to transit but fewer challenges around school quality and job opportunities.

There are a handful of jurisdictions who experience specific neighborhood challenges at a disproportionate rate compared to the county.

- For instance, East Palo Alto and Belmont residents experience neighborhood infrastructure issues (e.g., bad sidewalks, no lighting) more acutely than county residents overall.
- Brisbane residents experience transportation challenges in their neighborhoods.
- East Palo Alto, Redwood City, San Bruno, and South San Francisco experience challenges with school quality in their neighborhoods.
- Residents in Brisbane, Hillsborough, Pacifica, Belmont, and Half Moon Bay report the highest rates of difficulty accessing public transit.
- Daly City, Millbrae, San Mateo, and East Palo Alto residents were more likely to identify the lack of job opportunities available in their neighborhoods.

Over a third of jurisdictions' respondents experienced the following neighborhood challenges at a higher rate than the county: *I can't get to public transit/bus/light rail easily or safely.*

Figure 6c.
Top 5 Neighborhood Challenges Experienced by Jurisdiction

25% Above County average

25% Below County average

Neighborhood Challenges	County	Belmont	Brisbane	Burlingame	Daly City	East Palo Alto	Foster City	Half Moon Bay	Hillsborough	Milbrae	Pacifica	Redwood City	San Bruno	San Mateo	South San Francisco
Valid cases	2,079	80	72	153	116	48	130	56	53	46	75	145	91	151	712
My neighborhood does not have good sidewalks, walking areas, and/or lighting	17%	31%	18%	13%	25%	40%	4%	18%	23%	20%	15%	21%	14%	12%	16%
Schools in my neighborhood are poor quality	15%	6%	18%	3%	17%	25%	4%	14%	2%	7%	13%	20%	20%	15%	20%
Bus/rail does not go where I need to go or does not operate during the times I need	15%	14%	24%	8%	14%	15%	21%	18%	9%	15%	24%	17%	14%	17%	10%
I can't get to public transit/bus/light rail easily or safely	14%	19%	29%	7%	9%	10%	14%	18%	25%	17%	21%	12%	13%	15%	10%
There are not enough job opportunities in the area	12%	9%	8%	7%	20%	17%	8%	14%	0%	20%	13%	11%	11%	18%	12%
None of the above	50%	41%	28%	69%	45%	33%	62%	46%	57%	50%	52%	41%	52%	52%	55%

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Differences in needs by race and ethnicity and housing tenure. As shown in Figure 7a, and compared to the county overall:

- African American, Hispanic, and Other Race respondents, as well as Renters and those who are precariously housed experience several housing challenges at a higher rate than the county overall.
- Conversely, non-Hispanic White residents and homeowners are less likely to experience housing challenges.

Specifically,

- Black or African American residents are more than three times as likely to have a landlord not make a repair to their unit after a request compared to county residents overall. Renters, Hispanic, Other Race, and Precariously housed residents are also more likely to experience this challenge.
- African American, Asian, Hispanic, Renter, and Precariously Housed households are more likely to experience bed bugs or rodent infestation in their homes.
- African American, Other Race, Renter, and Precariously Housed households are also more likely to live further away from family, friends, and their community.
- African Americans are three times more likely than the average county respondent to be told by their HOA they cannot make changes to their house or property. Asian households are twice as likely to experience this challenge.
- Renter, Hispanic, and Other Race respondents are more likely to worry that if they request a repair it will result in a rent increase or eviction and to report that their homes are in bad condition.

Figure 7a.
Top 10 Housing Challenges Experienced by Race/Ethnicity and Tenure

25% Above County average

25% Below County average

Housing or Neighborhood Condition	County	African American	Asian	Hispanic	Other Race	Non-Hispanic White	Homeowner	Renter	Precariously Housed
Valid cases	2,159	132	489	392	144	734	986	974	301
I would like to move but I can't afford anything that is available/income too low	31%	30%	32%	50%	31%	20%	7%	48%	56%
My house or apartment isn't big enough for my family	20%	16%	21%	35%	22%	11%	12%	29%	18%
I worry that if I request a repair it will result in a rent increase or eviction	14%	17%	13%	23%	19%	11%	2%	28%	13%
My home/apartment is in bad condition	11%	12%	9%	16%	17%	10%	6%	17%	10%
My landlord refuses to make repairs despite my requests	6%	20%	7%	10%	10%	5%	2%	13%	10%
I live too far from family/ friends/my community	6%	15%	6%	6%	13%	6%	5%	8%	9%
I don't feel safe in my building/ neighborhood	6%	13%	6%	6%	9%	5%	4%	8%	7%
I need help taking care of myself/my home and can't find or afford to hire someone	5%	14%	7%	5%	6%	5%	5%	6%	11%
I have bed bugs/insects or rodent infestation	5%	14%	8%	7%	5%	4%	4%	9%	9%
The HOA in my neighborhood won't let me make changes to my house or property	4%	14%	8%	4%	3%	3%	5%	3%	7%
None of the above	42%	18%	37%	24%	38%	58%	68%	21%	13%

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

The above trends are similar for the **most acute housing affordability challenges**. As shown in Figure 7b, African American and Hispanic households, as well as renters and those precariously housed, experience affordability challenges at a higher rate than the county overall. Non-Hispanic White residents and homeowners experience these same challenges at a lower rate than the county.

- African American residents experience all five affordability challenges at a greater rate than the county overall.
- In addition to being more likely to not pay utility bills or rent on time, African American residents are more than four times as likely than the average county respondent to have a Section 8 voucher and worry that their landlord will raise their rent more than the voucher payment.
- Along with African American residents, Hispanic households, renters, and precariously housed households are most likely to experience difficulty paying utility bills, as well as have bad credit or eviction/foreclosure history impacting their ability to find a place to rent.
- These groups, with the exception of those precariously housed, are also more likely to be late on their rent payments.

Figure 7b.
Top 5 Affordability Challenges Experienced by Race/Ethnicity and Tenure

25% Above County average

25% Below County average

Affordability Challenges	County	African American	Asian	Hispanic	Other Race	Non-Hispanic White	Homeowner	Renter	Precariously Housed
Valid cases	2,130	132	487	391	146	739	983	953	293
I can't keep up with my utilities	10%	22%	11%	17%	14%	5%	5%	15%	15%
I'm often late on my rent payments	8%	13%	6%	12%	12%	4%	1%	15%	8%
I can't keep up with my property taxes	6%	16%	8%	4%	5%	7%	9%	5%	14%
I have bad credit/history of evictions/foreclosure and cannot find a place to rent	4%	5%	3%	8%	4%	2%	1%	6%	11%
I have Section 8 and I am worried my landlord will raise my rent higher than my voucher payment	4%	18%	5%	6%	7%	2%	2%	7%	8%
None of the above	73%	32%	70%	63%	64%	83%	84%	61%	54%

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

As shown in Figure 7c, African American and precariously housed residents experience neighborhood challenges at a higher rate than the county. These two groups experience neighborhood issues related to transportation more acutely than county residents overall. In addition to Other Race respondents, they are also more likely to identify the lack of job opportunities in their respective neighborhoods.

Additionally, Hispanic residents are more likely to live in neighborhoods with poor performing schools than the average county respondent. Homeowners are also more likely to report that they cannot access public transit easily or safely.

Figure 7c.
Top 5 Neighborhood Challenges Experienced by Race/Ethnicity and Tenure

25% Above County average

25% Below County average

Neighborhood Challenges	County	African American	Asian	Hispanic	Other Race	Non-Hispanic White	Homeowner	Renter	Precariously Housed
Valid cases	2,079	133	486	389	146	737	975	918	284
My neighborhood does not have good sidewalks, walking areas, and/or lighting	17%	14%	17%	19%	16%	18%	18%	15%	18%
Schools in my neighborhood are poor quality	15%	13%	18%	20%	17%	13%	18%	13%	13%
Bus/rail does not go where I need to go or does not operate during the times I need	15%	33%	16%	13%	17%	17%	17%	14%	24%
I can't get to public transit/bus/light rail easily or safely	14%	24%	15%	11%	16%	16%	18%	11%	19%
There are not enough job opportunities in the area	12%	22%	14%	12%	19%	9%	9%	15%	20%
None of the above	50%	23%	46%	48%	45%	53%	49%	51%	36%

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Differences in needs by household status. As shown in Figure 8a, single parents, households making less than $50,000, households with children under 18 and households with a member experiencing a disability are more likely to experience housing challenges. Conversely, households making more than $100,000 experience nearly all specified housing challenges at a lower rate than the county.

Single parents experience all ten housing challenges at a greater rate than the county overall.

Households making less than $25,000 also experience every challenge at a higher rate, with the exception of *I worry that if I request a repair it will result in a rent increase or eviction.*

Households making less than $50,000, single parents, and households with children under 18 are more likely to experience the following challenges:

- My house or apartment isn't big enough for my family;
- My house or apartment is in bad condition;
- My landlord refuses to make repairs despite my request;
- I live too far from family/friends/my community;
- I don't feel safe in my building/neighborhood;
- I need help taking care of myself/my home and can't find or afford to hire someone; and
- I have bed bugs/insects or rodent infestation.

Households with a member experiencing a disability are also more likely to experience landlords refusing their requests to make repairs, living further away from family/friends/community, and not being able to find or afford someone to help take care of themselves or their homes. These households are also more likely to experience bed bugs, insects, or rodent infestation, as well as HOA restrictions impacting their ability to make changes to their home or property.

Additionally, large households have the highest proportion of respondents among the selected groups that would like to move but can't afford anything that is available.

Figure 8a.
Top 10 Housing Challenges Experienced by Income and Household Characteristics

25% Above County average

25% Below County average

Housing or Neighborhood Condition	County	Less than $25,000	$25,000-$49,999	$50,000-$99,999	Above $100,000	Children under 18	Large Households	Single Parent	Disability	Adults (age 65+)
Valid cases	2,159	280	260	505	701	827	278	240	701	709
I would like to move but I can't afford anything that is available/income too low	31%	47%	48%	37%	16%	35%	51%	40%	36%	25%
My house or apartment isn't big enough for my family	20%	25%	25%	23%	16%	34%	43%	32%	20%	13%
I worry that if I request a repair it will result in a rent increase or eviction	14%	16%	18%	19%	9%	19%	19%	28%	16%	11%
My home/apartment is in bad condition	11%	15%	20%	12%	6%	15%	17%	17%	12%	9%
My landlord refuses to make repairs despite my requests	6%	13%	13%	8%	2%	9%	8%	14%	10%	6%
I live too far from family/ friends/my community	6%	9%	9%	6%	5%	10%	5%	10%	8%	6%
I don't feel safe in my building/ neighborhood	6%	9%	9%	6%	3%	8%	4%	10%	7%	5%
I need help taking care of myself/my home and can't find or afford to hire someone	5%	9%	9%	5%	3%	7%	6%	12%	11%	6%
I have bed bugs/insects or rodent infestation	5%	10%	9%	5%	3%	9%	4%	15%	9%	6%
The HOA in my neighborhood won't let me make changes to my house or property	4%	7%	3%	4%	3%	7%	4%	11%	6%	5%
None of the above	42%	21%	21%	37%	61%	28%	26%	12%	32%	49%

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

As shown in Figure 8b, households making less than $50,000, as well as large households, single parents, households with children under 18, and households with a member experience a disability, experience the most acute affordability challenges at a higher rate than the county overall. Households making more than $50,000 and adults over the age of 65 are less likely to experience affordability challenges.

Households making between $25,000-$50,000, single parents, and households with children under 18 experience all five affordability challenges at a greater rate than the average county respondent.

Of households experiencing major affordability issues, **single parent households are most acutely impacted.** These households are more than three times as likely to have a Section 8 voucher and fear their landlord will raise the rent impacting the viability of their voucher, more than twice as likely to miss utility payments and have bad credit/eviction or foreclosure history impacting their ability to rent, and twice as likely to have trouble keeping up with their property taxes.

Figure 8b.
Top 5 Affordability Challenges Experienced by Income and Household Characteristics

25% Above County average

25% Below County average

Affordability Challenges	County	Less than $25,000	$25,000-$49,999	$50,000-$99,999	Above $100,000	Children under 18	Large Households	Single Parent	Disability	Adults (age 65+)
Valid cases	2,130	276	260	509	703	830	279	239	699	716
I can't keep up with my utilities	10%	16%	16%	12%	3%	16%	14%	23%	15%	8%
I'm often late on my rent payments	8%	19%	16%	6%	1%	11%	12%	15%	11%	4%
I can't keep up with my property taxes	6%	7%	9%	8%	5%	9%	4%	12%	8%	7%
I have bad credit/history of evictions/foreclosure and cannot find a place to rent	4%	8%	7%	4%	1%	5%	6%	10%	6%	3%
I have Section 8 and I am worried my landlord will raise my rent higher than my voucher payment	4%	11%	6%	4%	1%	7%	3%	14%	8%	5%
None of the above	73%	46%	56%	72%	90%	59%	70%	32%	59%	75%

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

As shown in Figure 8c, households with children under 18, as well as single parents, households with a member experiencing a disability, and households making less than $25,000 are more likely to experience neighborhood challenges. These households are most likely to report that *the bus/rail does not go where I need to go or does not operate during the times I need.* In addition to households that make between $25,000-$100,000, these groups are more likely to identify the lack of job opportunities in their respective neighborhoods.

Households with children under 18 are more likely to live in neighborhoods with poor quality schools. Large households are more likely to report issues with neighborhood infrastructure (e.g., bad sidewalks, poor lighting) and households with a member experiencing a disability are more likely to report they cannot access public transit easily or safely.

Figure 8c.
Top 5 Neighborhood Challenges Experienced by Income and Household Characteristics

25% Above County average
25% Below County average

Neighborhood Challenges	County	Less than $25,000	$25,000-$49,999	$50,000-$99,999	Above $100,000	Children under 18	Large Households	Single Parent	Disability	Adults (age 65+)
Valid cases	2,079	273	259	503	709	824	277	234	692	714
My neighborhood does not have good sidewalks, walking areas, and/or lighting	17%	17%	15%	18%	17%	19%	22%	16%	19%	14%
Schools in my neighborhood are poor quality	15%	17%	14%	11%	19%	24%	19%	17%	14%	9%
Bus/rail does not go where I need to go or does not operate during the times I need	15%	19%	16%	15%	16%	19%	11%	28%	19%	16%
I can't get to public transit/bus/light rail easily or safely	14%	15%	12%	14%	14%	15%	12%	15%	19%	17%
There are not enough job opportunities in the area	12%	21%	17%	16%	6%	17%	12%	19%	15%	11%
None of the above	50%	40%	45%	51%	53%	38%	48%	31%	41%	53%

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Experience Finding Housing

This section explores residents' experience seeking a place to rent or buy in the county and the extent to which displacement—having to move when they do not want to move—is prevalent. For those respondents who seriously looked for housing in the past five years, this section also examines the extent to which respondents were denied housing to rent or buy and the reasons why they were denied.

Recent experience seeking housing to rent. Figure 9 presents the proportion of respondents who seriously looked to rent housing for the county, jurisdictions, and selected respondent characteristics, as well as the reasons for denial.

Over half of county respondents (56%) have seriously looked for housing in the past five years. The **most common reasons for denial** included:

- Landlord not returning the respondent's call (26%),
- Landlord told me the unit was available over the phone but when I showed up in person, it was no longer available (22%), and
- Landlord told me it would cost more because of my service or emotional support animal (14%).

Jurisdictions with the highest percentage of respondents who seriously looked for housing include Millbrae (74%), San Mateo (73%), and Redwood City (72%). While all three jurisdictions reported that *landlord not returning the respondent's call* was one of their main reasons for denial, 18% of Redwood City respondents identified *landlord told me they do not accept Section 8 vouchers* as a main reason for denial.

Among respondents by race/ethnicity, 80% of African American respondents reported that they had seriously looked for housing in the past five years while the lowest percentage of respondents who reported seriously looking for housing were non-Hispanic White (46%). The main reasons for denial experienced by African American respondents included *landlord told me the unit was available over the phone but when I showed up in person, it was no longer available* (39%), *landlord told me it would cost more because of my service or emotional support animal* (34%), and *landlord told me I couldn't have a service or emotional support animal* (28%).

Among respondents by tenure, renters (75%) and precariously housed (74%) respondents reported the highest rates of seriously looking for housing.

Among respondents by income, households making less than $25,000 (71%) had the highest rate. The main reasons for denial reported by these households were *landlord told me I couldn't have a service or emotional support animal* (36%) and *landlord told me it would cost more because of my service or emotional support animal* (30%).

Single parents (79%) and households with children under 18 (66%) also reported the highest percentage of those who seriously looked for housing in the past five years among the selected household characteristics respondent groups. In addition to sharing the top two reasons for denial with the county, 25% of single parent household respondents also reported they were denied housing because the *landlord told me I can't have a service or emotional support animal.*

Figure 9. If you looked seriously for housing to rent in San Mateo County in the past five years, were you ever denied housing?

		Reason for Denial									
	Overall Percent Seriously Looked for Housing	Landlord did not return calls and/or emails asking about a unit	Landlord said unit was available over phone, but when I showed up in person, it was no longer available	Landlord told me it would cost me more for my service or emotional animal	Landlord told me I can't have a service or emotional support animal	Landlord told me it would cost me more to rent because I have children	Landlord told me they don't rent to families with children	Landlord told me they do not accept Section 8 vouchers	Landlord told me they couldn't make changes to the apartment/ home for my disability	None of the Above	n
Jurisdiction											
County	**56%**	26%	22%	14%						45%	928
Belmont	**62%**	33%	27%							31%	49
Brisbane	**59%**		41%			22%				26%	27
Burlingame	**48%**	19%	23%							54%	57
Daly City	**63%**	33%	16%			16%				44%	61
East Palo Alto	**58%**	35%	30%							26%	23
Foster City	**50%**	12%		16%	14%					55%	51
Half Moon Bay	**68%**					17%	17%			48%	29
Hillsborough	**42%**		14%	29%	14%					57%	14
Milbrae	**74%**	25%	46%							36%	28
Pacifica	**51%**	16%	26%						16%	55%	31
Redwood City	**72%**	31%						18%		40%	99
San Bruno	**57%**			22%		22%				39%	36
San Mateo	**73%**	30%	34%							39%	98
South San Francisco	**47%**	24%	13%							56%	248
Race/Ethnicity											
African American	**80%**		39%	34%	28%					15%	101
Asian	**56%**	19%	29%							40%	199
Hispanic	**63%**	32%	22%							41%	230
Other Race	**70%**	29%	22%							45%	91
Non-Hispanic White	**46%**	29%	20%							48%	263
Tenure											
Homeowner	**36%**		25%						15%	54%	183
Renter	**75%**	29%	22%							43%	641
Precariously Housed	**74%**	23%	32%							26%	188
Income											
Less than $25,000	**71%**			30%	36%					29%	182
$25,000-$49,999	**60%**	39%	32%							27%	149
$50,000-$99,999	**58%**	24%		20%						45%	251
Above $100,000	**48%**	19%	14%							64%	216
Household Characteristics											
Children under 18	**66%**	30%	29%							33%	447
Large Households	**60%**	33%	19%			18%				44%	139
Single Parent	**79%**	25%	35%		25%					19%	173
Disability	**63%**	24%	24%							34%	386
Older Adults (age 65+)	**48%**	20%	29%							39%	282

Note: The "Percent Seriously Looked for Housing" column includes all respondents, not just those who indicated they rent.

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Recent experience seeking housing to buy. Figure 10 presents the proportion of respondents who seriously looked to buy housing in the county, by jurisdiction, and selected respondent characteristics, as well as the reasons for denial. As noted above, 56% of county respondents have seriously looked for housing in the past five years.

The most common reasons for denial included:

- Real estate agent told me I would need to show I was prequalified with a bank (29%) and
- A bank would not give me a loan to buy a home (23%).

For the jurisdictions with the highest percentage of respondents who seriously looked for housing (Millbrae, San Mateo and Redwood City), all three cities shared the same top two reasons for denial as the county. Additionally, 21% of Millbrae respondents reported that *the real estate agent would not make a disability accommodation when I asked*.

For African American respondents who looked to buy housing in the last five years, the most common reason for denial was *the real estate agent would not make a disability accommodation when I asked* (47%). African Americans, along with Other Races, also most commonly reported that they needed a loan prequalification before real estate agents would work with them. While between 43-54% of respondents from other racial/ethnic groups reported they did not experience any reason for denial when seriously looking to buy housing over the past five years, 12% of African American respondents reported similarly.

Among respondents by income, the main reasons for denial for households making less than $25,000 were *the real estate agent told me I would need to show I was prequalified with a bank* (32%) and *real estate agent only showed me or only suggested homes in neighborhoods where most people were of my same race or ethnicity* (26%).

Among the selected housing characteristics category, single parent households and households with children under 18 reported shared the same top two reasons for denial as the county. Additionally, 36% of single parent household respondents reported that *the real estate agent would not make a disability accommodation when I asked*, as well as 25% of respondents over the age of 65.

Residents in Redwood City, Millbrae, and South San Francisco, as well as large households, also reported that *a bank or other lender charged me a high interest rate on my home loan* as a reason for denial.

Figure 10. If you looked seriously for housing to buy in San Mateo County in the past five years, were you ever denied housing?

	Percent Seriously Looked for Housing	Reason for Denial						n
		The real estate agent told me I would need to show I was prequalified with a bank	A bank or other lender would not give me a loan to buy a home	The real estate agent would not make a disability accommodation when I asked	Only showed homes in neighborhoods where most people were same race/ethnicity	A bank or other lender charged me a high interest rate on my home loan	None of the Above	
Jurisdiction								
County	**56%**	29%	23%				50%	870
Belmont	**62%**	21%			15%		35%	48
Brisbane	**59%**	36%			30%		42%	33
Burlingame	**48%**	22%	14%				61%	51
Daly City	**63%**	19%	27%				56%	52
East Palo Alto	**58%**	24%	33%				48%	21
Foster City	**50%**	25%	20%				49%	51
Half Moon Bay	**68%**	35%	23%	23%			50%	26
Hillsborough	**42%**	18%		23%			59%	22
Milbrae	**74%**	25%	29%	21%		21%	54%	28
Pacifica	**51%**	35%	35%				42%	31
Redwood City	**72%**	30%	22%			27%	50%	64
San Bruno	**57%**	14%	21%				62%	42
San Mateo	**73%**	40%	32%				38%	82
South San Francisco	**47%**	26%	18%			16%	57%	251
Race/Ethnicity								
African American	**80%**	40%	38%	47%			12%	89
Asian	**56%**	30%	25%				43%	223
Hispanic	**63%**	29%	28%				49%	174
Other Race	**70%**	36%	21%			21%	50%	90
Non-Hispanic White	**46%**	29%	23%				54%	250
Tenure								
Homeowner	**36%**	29%	17%				54%	332
Renter	**75%**	32%	27%				46%	467
Precariously Housed	**74%**	36%	36%	30%			30%	154
Income								
Less than $25,000	**71%**	32%	25%		26%		41%	131
$25,000-$49,999	**60%**	42%	40%				29%	106
$50,000-$99,999	**58%**	35%	30%				38%	216
Above $100,000	**48%**	22%	13%			10%	64%	296
Household Characteristics								
Children under 18	**66%**	33%	28%				40%	443
Large Households	**60%**	33%	25%			25%	49%	126
Single Parent	**79%**	38%	43%	36%			24%	143
Disability	**63%**	35%	26%				38%	330
Older Adults (age 65+)	**48%**	35%	29%	25%			38%	252

Note: The "Percent Seriously Looked for Housing" column includes all respondents, not just those who indicated they buy.

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Denied housing to rent or buy. Figure 11 presents the proportion of those who looked and were denied housing to rent or buy for the county, jurisdictions, and selected respondent characteristics, as well as reason for denial. As shown, nearly 4 in 10 county respondents who looked for housing experienced denial of housing. African American/Black respondents, precariously housed respondents, households with income below $50,000, and single parent respondents have denial rates of 60% or higher. African American (79%) and single parent (74%) respondents report the highest rates of denial.

Among the reasons for denial:

- ***Income too low*** **was a major reason for denial for all groups** except homeowners and households with incomes above $100,000. Additionally, all jurisdictions report this as a common reason for being denied housing with the exception of Foster City, Hillsborough, and San Bruno.

- *Haven't established a credit history or no credit history* was also a common reason of denial for most groups. The impacts are higher for Asian, Hispanic and African American households, along with renter and precariously housed respondents, households with income below $50,000, and single parent households, households with children under 18, households with a member experiencing a disability, and several jurisdictions.

- Another top denial reason among certain groups is the *landlord didn't accept the type of income I earn (social security or disability benefit or child support)*. **Source of income was the most common reason for denial among African American households** (28%). Other groups with denial rates of 25% or higher for this specific issue include precariously housed respondents, single parent households, and households with a member experiencing a disability, as well as Foster City and San Bruno residents.

- *Bad credit* is another barrier for accessing housing, particularly for Hispanic and Other Race households, households with income between $50,000-$100,000, and large households. This also impacts East Palo Alto, San Mateo, Daly City, Redwood City, Burlingame, and South San Francisco residents at a higher rate.

Figure 11. If you looked seriously for housing to rent or buy in San Mateo County in the past five years, were you ever denied housing?

			Reason for Denial												
	Percent Denied Housing	Total n	Bad Credit	Eviction history	Income too low	Too many people in my household	Other renter/ applicant willing to pay more for rent	Haven't established a credit history/no credit history	Don't have a regular/ steady job/ consistent work history	Landlord didn't accept the type of income I earn (social security or disability)	Lack of stable housing record	Real or perceived sexual orientation or gender identity	I had/ have COVID	Foreclosure	n
Jurisdiction															
County	**39%**	1154	18%		44%		19%	21%							449
Belmont	**52%**	50			38%		27%	27%							26
Brisbane	**42%**	38			25%			19%				31%			16
Burlingame	**30%**	71	24%		29%										21
Daly City	**49%**	73	28%		53%		28%		19%						36
East Palo Alto	**55%**	29	38%		44%			25%							16
Foster City	**30%**	63							25%	40%	30%				19
Half Moon Bay	**41%**	34			29%			29%							14
Hillsborough	**23%**	22										40%			5
Milbrae	**36%**	33			67%	25%		33%					25%		12
Pacifica	**38%**	39			47%			27%	33%						15
Redwood City	**41%**	105	28%		63%	26%		26%							43
San Bruno	**25%**	51		31%						31%	38%				13
San Mateo	**48%**	112	30%		38%						28%				53
South San Francisco	**30%**	331	19%		58%		28%			17%					98
Race/Ethnicity															
African American	**79%**	107		25%	25%			25%		28%		27%			85
Asian	**42%**	281			38%			28%		21%		21%			117
Hispanic	**49%**	253	28%		60%		26%	26%							125
Other Race	**43%**	105	22%		49%		24%								45
Non-Hispanic White	**31%**	351			40%			19%	23%		25%				108
Tenure															
Homeowner	**26%**	348								24%	22%	23%			91
Renter	**45%**	687			48%		20%	24%							310
Precariously Housed	**61%**	208			42%			22%		25%					126
Income															
Less than $25,000	**64%**	199			47%			31%	29%						127
$25,000-$49,999	**65%**	158			48%			21%		20%	20%				103
$50,000-$99,999	**38%**	302	21%		51%	24%									114
Above $100,000	**18%**	346				27%	16%			20%				16%	64
Household Characteristics															
Children under 18	**51%**	558			42%			26%		19%					283
Large Households	**43%**	171	27%		64%	41%									74
Single Parent	**74%**	189			41%			27%		25%					138
Disability	**54%**	446			39%			21%		25%					239
Older Adults (age 65+)	**44%**	350			35%					22%		21%			153

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Experience using housing vouchers. It is **"difficult" or "very difficult" for eight out of 10 voucher holders to find a landlord that accepts a housing voucher** (Figure 13).

As shown in Figure 12, this is related to the amount of the voucher and current rents and the lack of supply (inability to find a unit in the allotted amount of time). Over half of voucher holders (53%) who experienced difficulty indicated the *voucher is not enough to cover the rent for places I want to live* and almost half of voucher holders (49%) who experienced difficulty indicated there is *not enough time to find a place to live before the voucher expires.*

Other significant difficulties using vouchers identified by respondents included *landlords have policies of not renting to voucher holders* (46%) and *can't find information about landlords that accept Section 8* (36%).

Among respondents by race/ethnicity, African American respondents had the greatest proportion of those with a housing choice voucher (60%). Of those respondents, 76% found it difficult to find a landlord that accepts a housing voucher. While 13% of Hispanic respondents have a housing voucher, 85% have found it difficult to use the voucher. Fourteen percent of Asian respondents have housing vouchers—nearly three quarters of these respondents reported that the *voucher is not enough to cover the rent for the places I want to live*.

Other groups of respondents with higher proportions of voucher utilization include single parent households (43%), precariously housed respondents (30%), and households with income below $25,000 (29%). For each of the aforementioned groups, more than 75% of their respective respondents reported difficulty in utilizing the housing choice voucher. The *voucher is not enough to cover the rent for places I want to live* was one of the main reasons cited for not using the voucher.

Figure 12. Why is it difficult to use a housing voucher?

Source:

Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

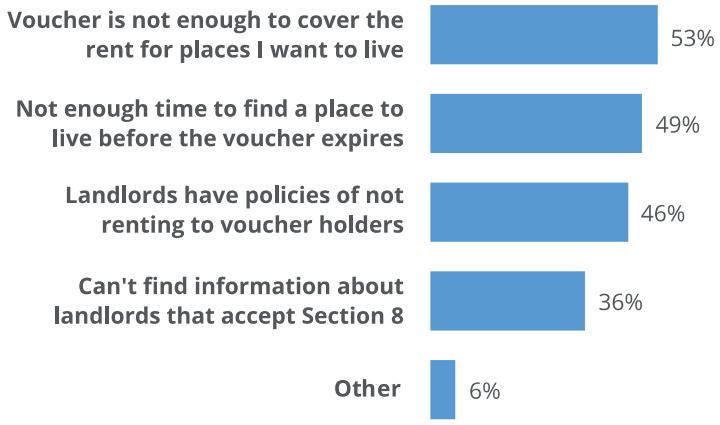


Figure 13. How difficult is it to find a landlord that accepts a housing voucher?

	Percent with a Housing Voucher	Not difficult	Somewhat difficult	Very difficult	n	Voucher is not enough to cover the rent for places I want to live	Not enough time to find a place to live before the voucher expires	Landlords have policies of not renting to voucher holders	Can't find information about landlords that accept Section 8	Other	n
Jurisdiction											
County	**12%**	18%	55%	27%	250	53%	49%	46%	36%	6%	203
Belmont	**16%**	14%	64%	21%	81	45%	64%	36%	27%	9%	11
Brisbane	**22%**	20%	73%	7%	15	50%	50%	42%	33%	0%	12
Burlingame	**8%**	0%	75%	25%	12	50%	50%	25%	8%	0%	12
Daly City	**12%**	14%	50%	36%	14	83%	25%	42%	17%	25%	12
East Palo Alto	**14%**	29%	57%	14%	7	20%	20%	40%	60%	0%	5
Foster City	**12%**	18%	47%	35%	17	47%	40%	27%	33%	7%	15
Half Moon Bay	**19%**	22%	56%	22%	9	71%	29%	29%	43%	14%	7
Hillsborough	**8%**	25%	75%	0%	4	67%	67%	33%	0%	0%	3
Milbrae	**22%**	50%	20%	30%	10	60%	40%	20%	40%	0%	5
Pacifica	**11%**	13%	50%	38%	8	86%	43%	43%	43%	0%	7
Redwood City	**16%**	13%	61%	26%	23	40%	50%	70%	45%	5%	20
San Bruno	**12%**	9%	64%	27%	11	40%	60%	50%	10%	10%	10
San Mateo	**24%**	24%	50%	26%	38	43%	54%	43%	39%	7%	28
South San Francisco	**4%**	11%	33%	56%	27	63%	50%	71%	63%	8%	24
Race/Ethnicity											
African American	**60%**	24%	60%	16%	82	55%	52%	40%	31%	6%	62
Asian	**14%**	23%	63%	14%	71	73%	44%	31%	31%	0%	55
Hispanic	**13%**	15%	40%	45%	53	58%	42%	51%	49%	11%	45
Other Race	**19%**	29%	50%	21%	28	55%	45%	65%	35%	5%	20
Non-Hispanic White	**8%**	14%	61%	25%	64	43%	61%	57%	38%	4%	56
Tenure											
Homeowner	**8%**	23%	59%	18%	78	58%	49%	42%	31%	0%	59
Renter	**18%**	19%	52%	30%	165	55%	52%	48%	43%	6%	134
Precariously Housed	**30%**	14%	66%	20%	86	57%	54%	35%	26%	7%	74
Income											
Less than $25,000	**29%**	17%	58%	25%	84	47%	41%	47%	37%	10%	70
$25,000-$49,999	**18%**	17%	52%	31%	48	63%	55%	63%	40%	5%	40
$50,000-$99,999	**12%**	23%	52%	26%	62	55%	55%	51%	37%	2%	49
Above $100,000	**5%**	20%	57%	23%	35	43%	61%	29%	32%	4%	28
Household Characteristics											
Children under 18	**21%**	20%	60%	20%	179	59%	51%	44%	35%	1%	143
Large Households	**7%**	20%	45%	35%	20	63%	56%	63%	56%	6%	16
Single Parent	**43%**	17%	58%	24%	103	62%	52%	38%	33%	2%	85
Disability	**22%**	18%	58%	24%	158	57%	52%	42%	29%	5%	129
Older Adults (age 65+)	**17%**	18%	63%	19%	123	56%	53%	44%	34%	3%	102

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Displacement. Figure 14 presents the proportion of residents who experienced displacement in the past five years, as well as the reason for displacement.

- Overall, 21% of survey respondents experienced displacement in the past five years. Among all survey respondents, the **main reason for displacement was rent increased more than I could pay** (29%).

- Respondents who are precariously housed have higher rates of recent displacement than homeowners or renters; this suggests that when displaced a unit these housing-insecure tenants are more likely to couch surf or experience homelessness for some period of time before securing a new place to live.

- Among respondents by race/ethnicity, **African American respondents reported the highest rate of displacement** (59%). The primary reason reported by African American respondents for their displacement was *housing was unsafe (e.g., domestic assault, harassment)*. Twenty eight percent also reported that they were *forced out for no reason*.

- Asian households, as well as homeowners, households that make less than $25,000, single parent households, households that include a member experiencing a disability, and Millbrae, Brisbane and Pacifica residents are also more likely than other respondents to have been displaced due to an unsafe housing situation (e.g., domestic assault, harassment).

- Additionally, Asian, precariously housed respondents, households making less than $25,000, single parent households, and Hillsborough residents are more likely than other respondents to have been displaced and not given a reason.

For respondents that had experienced displacements, they were asked to identify which city they moved from and which city they moved to. **The most common moves to and from cities included**:

- Moved within South San Francisco (28 respondents)
- Moved from outside San Mateo County to San Mateo (10 respondents)
- Moved from San Bruno to South San Francisco (9 respondents)
- Moved from Daly City to South San Francisco (9 respondents)
- Moved within Burlingame (8 respondents)

Figure 14. Displacement Experience and Reasons for Displacement

			Reason for Displacement													
	Percent Displaced	Total n	Rent increased more than I could pay	Personal/ relationship reasons	Landlord was selling the home/ apartment	Landlord wanted to move back in/move in family	Landlord wanted to rent to someone else	Landlord refused to renew my lease	Housing was unsafe (e.g., domestic assault, harassment)	Forced out for no reason	Health/medical reasons	I was behind on rent	Poor condition of property	Because of apartment rules	Utilities were too expensive/ shut off	Natural disaster/ flooding/ fire	n
Jurisdiction																	
County	**21%**	2066	29%	19%	18%												417
Belmont	**26%**	80	25%					25%						30%			20
Brisbane	**24%**	67				25%			31%			25%					16
Burlingame	**22%**	152	24%		30%	18%											33
Daly City	**25%**	115	35%	27%						31%							26
East Palo Alto	**32%**	50	20%	20%			20%										15
Foster City	**11%**	130			21%	21%				21%	43%						14
Half Moon Bay	**31%**	51			31%	25%											16
Hillsborough	**12%**	52				33%	33%			33%	33%		33%				6
Milbrae	**27%**	44					42%		33%		25%					25%	12
Pacifica	**21%**	75			31%				31%	31%							16
Redwood City	**29%**	146	31%									21%					42
San Bruno	**25%**	89	33%	29%					24%								21
San Mateo	**37%**	153	35%	31%							20%						54
South San Francisco	**12%**	712	42%	15%	16%												81
Race/Ethnicity																	
African American	**59%**	134				29%			30%	28%							79
Asian	**22%**	500				31%			22%	22%							109
Hispanic	**29%**	397	33%	22%									18%				115
Other Race	**28%**	149	54%						20%						24%		41
Non-Hispanic White	**14%**	757	27%	20%	31%												102
Tenure																	
Homeowner	**8%**	975		27%		25%			31%								75
Renter	**34%**	905	32%	18%	22%												292
Precariously Housed	**48%**	280	23%				24%			23%							132
Income																	
Less than $25,000	**45%**	282	28%	20%					20%	20%							127
$25,000-$49,999	**30%**	265	31%		19%							18%					78
$50,000-$99,999	**22%**	517	32%	22%	18%												115
Above $100,000	**8%**	721			27%	20%	23%										60
Household Characteristics																	
Children under 18	**30%**	840	27%			20%	19%										249
Large Households	**20%**	284	32%		19%								18%				57
Single Parent	**55%**	240				24%			24%	20%							131
Disability	**34%**	711	26%	20%			20%		20%								241
Older Adults (age 65+)	**22%**	736	23%	22%		22%											162

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Children changing schools after displacement. Overall, for households with children that were displaced in the past five years, **60% of children in those households have changed schools**. The most common outcomes reported among these respondents included *school is more challenging* (28%), *they feel less safe at the new school* (25%), and *they are in a worse school* (24%) (Figure 15).

Among respondents by race/ethnicity, non-Hispanic White households (44%) were the only subgroup to report that being displaced resulted in their children being in better schools. Of African American households that were displaced and have children, 87% reported that their children changed schools. Of these respondents, 32% reported that their children *feel safer at the new school* but also *have fewer activities.*

Among respondents by tenure, precariously housed (78%) and homeowner (74%) households had the highest proportion of children who changed schools. The most common outcomes for precariously housed households included *School is less challenging/they are bored* (35%) and their children *feel less safe at school* (34%). For homeowner households, 39% reported that *school is more challenging,* followed by 31% who reported that their children *feel less safe at school*.

Among respondents by selected household characteristics, older adult (77%), single parent (74%), households with a member experiencing a disability (70%), and households with children under 18 (67%) all reported high proportions of children who changed schools. The most common outcomes for these respondents included *School is more challenging* and *they feel less safe at the new school.*

Figure 15. Children Changing Schools and Outcomes, Displaced Households

	Percent of Children that Changed Schools	Total n	School change outcomes									
			School is less challenging/ they are bored	School is more challenging	They are in a better school	They are in a worse school	They feel less safe at the new school	They feel safer at the new school	They have fewer activities	They have more activities	Things are about the same	n
Jurisdiction												
County	60%	306		28%		24%	25%					183
Belmont	45%	20		33%		44%	33%					9
Brisbane	81%	16		38%			31%	31%				13
Burlingame	55%	22	33%	33%						33%		12
Daly City	41%	17	43%		29%		29%			29%		7
East Palo Alto	54%	13	43%	57%			29%					7
Foster City	62%	13								50%		8
Half Moon Bay	58%	12		43%			29%	29%	43%			7
Hillsborough	60%	5						67%				3
Milbrae	82%	11		33%		44%	44%	33%				9
Pacifica	91%	11				50%						10
Redwood City	52%	23			25%	33%		25%				12
San Bruno	67%	18	33%		33%		33%					12
San Mateo	66%	35	32%		32%							22
South San Francisco	36%	56		26%	26%						26%	19
Race/Ethnicity												
African American	87%	69	30%	30%				32%	32%			60
Asian	73%	91	27%	32%		32%	27%					66
Hispanic	49%	91		23%		30%	23%		25%			44
Other Race	65%	31		40%		30%	25%	25%				20
Non-Hispanic White	60%	60	28%	31%	44%		28%					36
Tenure												
Homeowner	74%	66		39%		29%	31%					49
Renter	58%	213	25%	30%			25%					122
Precariously Housed	78%	104	35%				34%		30%			80
Income												
Less than $25,000	65%	92	22%	32%			35%					60
$25,000-$49,999	66%	56	25%			28%		28%	25%			36
$50,000-$99,999	55%	85		30%	28%		23%					47
Above $100,000	59%	44	35%	31%		38%						26
Household Characteristics												
Children under 18	67%	237		32%		23%	25%					158
Large Households	45%	44		32%	26%						32%	19
Single Parent	74%	124		32%		28%	29%					92
Disability	70%	188	26%	28%			30%					132
Older Adults (age 65+)	77%	117		35%		29%	29%					89

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Experience with housing discrimination. Overall, **19% of survey respondents felt they were discriminated against when they looked for housing** in the area.[1] As shown in Figure 16, African American respondents (62%), single parent households (44%) and precariously housed respondents (39%) are most likely to say they experienced housing discrimination. Residents with income above $100,000 and homeowners are least likely (11%).

Respondents who believed they experienced discrimination when looking for housing in the county reported when the discrimination occurred. Nearly half of respondents (45%) reported that the discrimination they experienced occurred between 2 and 5 years ago. Twenty eight percent of respondents reported that the discrimination occurred in the past year, 20% reported more than 5 years ago and 7% of respondents did not remember when the discrimination occurred.

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

Among top responses for actions taken in response to experienced discrimination, every group reported *Nothing/I wasn't sure what to do* with the exception of African American and single parent households, as well as Brisbane and Hillsborough residents. Similarly, survey respondents from Foster City and Pacifica were the only groups not to include *Moved/found another place to live* among their top responses. African American and Asian households, as well as single parent households, were more likely than other groups to contact either a housing authority, local fair housing organization, or the California Department of Housing or Civil Rights to report their discrimination incident.

Reasons for discrimination. Respondents who believed they experienced discrimination when looking for housing in the county provided the reasons why they thought they were discriminated against. Note that the basis offered by residents is not necessarily protected by federal, state, or local fair housing law, as respondents could provide open-ended and multiple reasons why they thought they experienced discrimination.

Examples of how respondents described why they felt discriminated against, which they provided as open-ended responses to the survey, include:

[1] Note that this question applies to all respondents, not just those who seriously looked for housing in the past five years.

Appearance/Characteristics

- *"Because of my race and ethnicity"*
- *"[We] were given a subprime loan for home purchase for being Latinx, low-income and primarily Spanish-speaking; refinance last year was lower than expected."*
- *"It was clear my disability is the reason"*
- *"I have a child and a couple places told me they wouldn't rent to me due to my son."*
- *"The agent asked if I was a tech worker. When I said no, the agent said the place was just rented, even though it was on the listing as active."*
- *"I was approved for the unit and when they met my partner, who is Black, they said [the unit] was rented."*

Source of Income/Credit

- *"Income was through SSDI [social security disability insurance]"*
- *"The landlord wanted an excellent credit score…"*
- *"We were not able to provide all the requirement to rent, like SSN [social security number], income proof, employment, and we don't make enough income…"*
- *"They wanted someone with income from employment not due to disability."*
- *"I was discriminated against because of my race and the fact that I had Section 8 at the time. Being African American and having Section 8 made a lot of people feel like I wouldn't take care of their property."*
- *"I am currently being discriminated against due to my need with rental help and because two of us in our household have a need for an emotional support animal."*

Immigration status

- *Mi hermana llamo a los departamentos donde yo vivo y la manager le dijo que no había disponible pero no era verdad también le dijo que hablara inglés y le pidió seguro social pensando que no tenia y le dijo que tenía que ganar una cierta cantidad de dinero para poder rentar. (My sister called the apartments where I live and the manager told her that there was no one available but it was not true. She also told her to speak English and asked for social security thinking that she did not have it and told her that she had to earn a certain amount of money to be able to rent).*

Figure 16. Percent of respondents who felt they were discriminated against and how was it addressed

	Percent who felt they were discriminated against	In the past year	2 to 5 years ago	More than 5 years ago	Don't remember	n	Nothing/ I wasn't sure what to do	Moved/ found another place to live	Nothing/ I was afraid of being evicted/ harassed	Called/ emailed housing authority	Called/ emailed local fair housing organization	Called/ emailed California Department of Housing/ Civil Rights	Called/ emailed City office, County office, or human rights department/ agency	Filed a complaint	Other	n
Jurisdiction																
County	**19%**	28%	45%	20%	7%	357	42%	30%	20%							359
Belmont	**21%**	19%	56%	19%	6%	16	38%	38%	50%							16
Brisbane	**22%**	29%	36%	29%	7%	14		64%			21%		21%			14
Burlingame	**14%**	25%	50%	20%	5%	20	35%	25%		20%		20%				20
Daly City	**15%**	20%	40%	33%	7%	15	56%	25%	25%							16
East Palo Alto	**29%**	23%	54%	15%	8%	13	38%	38%	23%	23%						13
Foster City	**18%**	15%	40%	45%	0%	20	38%						24%	24%		21
Half Moon Bay	**26%**	27%	55%	9%	9%	11	27%	36%			36%					11
Hillsborough	**15%**	14%	71%	0%	14%	7		29%			57%					7
Milbrae	**29%**	36%	50%	7%	7%	14	31%	23%		38%		23%				13
Pacifica	**21%**	29%	36%	36%	0%	14	50%		21%	29%		21%			21%	14
Redwood City	**24%**	34%	34%	19%	13%	32	47%	26%	21%	21%						34
San Bruno	**12%**	30%	60%	0%	10%	10	50%	30%		30%	30%					10
San Mateo	**30%**	35%	45%	15%	5%	40	53%	26%	26%							38
South San Francisco	**13%**	30%	40%	23%	6%	82	59%	27%								83
Race/Ethnicity																
African American	**62%**	16%	59%	25%	0%	83		36%	29%	27%	26%	27%	24%			84
Asian	**16%**	24%	50%	20%	6%	82	28%	25%	29%	29%	24%	24%				83
Hispanic	**27%**	25%	42%	24%	8%	107	52%	27%								107
Other Race	**30%**	28%	47%	14%	12%	43	47%	30%	26%							43
Non-Hispanic White	**12%**	38%	41%	14%	7%	91	44%	27%	18%							91
Tenure																
Homeowner	**11%**	26%	46%	20%	7%	95	32%	29%	22%							96
Renter	**28%**	26%	47%	20%	6%	232	42%	32%	23%							232
Precariously Housed	**39%**	21%	54%	20%	4%	98	24%	28%		35%		26%				100
Income																
Less than $25,000	**36%**	29%	51%	11%	9%	100	39%	30%	25%							102
$25,000-$49,999	**24%**	31%	41%	22%	6%	64	42%	36%	25%	22%						64
$50,000-$99,999	**19%**	27%	45%	25%	3%	97	44%	29%			18%					97
Above $100,000	**11%**	28%	45%	21%	7%	76	45%	22%	16%	16%						76
Household Characteristics																
Children under 18	**26%**	21%	57%	15%	6%	216	36%	31%	26%							218
Large Households	**19%**	26%	52%	9%	13%	54	65%	24%	15%							55
Single Parent	**44%**	13%	65%	17%	5%	106		33%	32%	27%	26%	26%				107
Disability	**33%**	27%	48%	21%	4%	215	33%	30%		22%						219
Older Adults (age 65+)	**20%**	20%	51%	20%	8%	144	24%	34%	24%	24%						146

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Experience of persons with disabilities. Overall, 35% of respondents' households include a member experiencing a disability. Of these households, 26% said their housing does not meet their accessibility needs; 74% report that their current housing situation meets their needs. The three top greatest housing needs expressed by respondents included grab bars in bathroom or bench in shower (34%), supportive services to help maintain housing (33%), and ramps (26%). Other needs expressed by a substantial proportion of groups included *wider doorways, reserved accessible parking spot by the entrance,* and *more private space in the facility in which I live*.

Of respondents by jurisdiction, East Palo Alto (64%) has the lowest proportion of respondents with disabilities whose current housing situation meets their needs. Of these respondents, 63% indicated they needed supportive services to help maintain housing.

The highest proportion of respondents by group reporting that they or a member of their household experiences a disability were African American (71%), households making less than $25,000 (59%), single parent households (58%), and precariously housed respondents (56%).

Figure 17. Respondents experiencing a disability and their top three greatest housing needs

	Percent of respondents with a disability	Current housing situation meeting needs	Total n	Grab bars in bathroom or bench in shower	Supportive services to help maintain housing	Ramps	Wider doorways	Reserved accessible parking spot by entrance	More private space in the facility in which I live	Service or emotional support animal allowed	Would like to live alone (not with a roommate)	Fewer restrictions/ more freedom	Alarm to notify if a non-verbal child leaves the home	Fire alarm/doorbell made accessible for person with hearing disability/deaf	Better navigation for person who is blind	n
Jurisdiction																
County	35%	74%	711	34%	33%	26%										171
Belmont	35%	89%	28	67%	67%											3
Brisbane	37%	72%	25	29%	29%		29%	29%								7
Burlingame	27%	80%	41	63%	50%		50%									8
Daly City	34%	68%	38		36%		36%		45%		36%					11
East Palo Alto	44%	64%	22		63%											8
Foster City	31%	83%	40		29%		29%									7
Half Moon Bay	45%	68%	22	29%								29%				7
Hillsborough	26%	100%	13													n/a
Milbrae	40%	82%	17	25%					25%	25%			25%	25%	25%	4
Pacifica	39%	93%	29				100%									2
Redwood City	42%	68%	62	33%	28%	28%			33%							18
San Bruno	40%	82%	34	50%		33%		33%								6
San Mateo	43%	72%	65	41%	47%					41%						17
South San Francisco	30%	68%	210	35%	28%	32%										57
Race/Ethnicity																
African American	71%	87%	95		40%		40%	33%								15
Asian	31%	77%	157	29%	34%	26%			26%							35
Hispanic	41%	70%	162	37%	54%				35%							46
Other Race	38%	71%	56	63%		50%	44%									16
Non-Hispanic White	32%	77%	241	33%		27%		21%								52
Tenure																
Homeowner	29%	82%	280	35%		37%		37%								43
Renter	39%	73%	347	41%	40%				27%							88
Precariously Housed	56%	71%	154		37%		26%				33%					43
Income																
Less than $25,000	59%	71%	167		42%				27%		23%					48
$25,000-$49,999	40%	67%	107		45%	45%	45%									31
$50,000-$99,999	35%	77%	180	43%	26%	24%										42
Above $100,000	23%	82%	167	52%		34%		41%								29
Household Characteristics																
Children under 18	35%	78%	293		40%		29%		32%							63
Large Households	35%	70%	99	41%	45%				34%							29
Single Parent	58%	81%	139		48%		28%		41%							29
Older Adults (age 65+)	46%	76%	337	44%	29%	30%										79

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Transportation. Over 80% of respondents indicated the type of transportation used most often is driving a personal vehicle. This share was relatively similar across the majority of jurisdictions and was the number one type of transportation used across all jurisdictions and demographic characteristics.

The groups with the lowest proportion of those who primarily drive included African American (40%), households making less than $25,000 (53%), single parents (57%), and precariously housed (57%) respondents.

As shown in Figure 18, on average respondents are fairly satisfied with their transportation situation. Those groups somewhat or not at all satisfied with their transportation options include African American (58%), Brisbane (51%), single parents (45%) and precariously housed (44%) respondents.

Figure 18. Are you satisfied with your current transportation options?

Source:

Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

	Entirely satisfied	Mostly satisfied	Somewhat unsatisfied	Not at all satisfied	n
Jurisdiction					
County	29%	45%	20%	6%	1,903
Belmont	21%	42%	27%	10%	78
Brisbane	17%	33%	38%	13%	64
Burlingame	32%	45%	21%	1%	139
Daly City	19%	52%	20%	8%	109
East Palo Alto	31%	36%	24%	9%	45
Foster City	29%	43%	20%	9%	115
Half Moon Bay	30%	35%	26%	9%	46
Hillsborough	50%	34%	14%	2%	44
Milbrae	30%	45%	13%	13%	40
Pacifica	28%	42%	15%	15%	65
Redwood City	30%	36%	27%	8%	142
San Bruno	23%	54%	19%	4%	81
San Mateo	29%	52%	14%	4%	134
South San Francisco	34%	48%	15%	3%	666
Race/Ethnicity					
African American	22%	21%	48%	10%	134
Asian	23%	49%	24%	4%	500
Hispanic	29%	43%	22%	7%	397
Other Race	29%	41%	21%	9%	149
Non-Hispanic White	32%	45%	17%	5%	757
Tenure					
Homeowner	31%	45%	18%	6%	905
Renter	27%	44%	23%	6%	834
Precariously Housed	20%	36%	35%	9%	254
Income					
Less than $25,000	22%	39%	29%	10%	282
$25,000-$49,999	25%	42%	26%	8%	265
$50,000-$99,999	28%	52%	16%	4%	517
Above $100,000	34%	44%	18%	4%	721
Household Characteristics					
Children under 18	25%	43%	25%	6%	840
Large Households	29%	50%	18%	4%	284
Single Parent	20%	36%	38%	7%	240
Disability	25%	40%	27%	8%	658
Older Adults (age 65+)	30%	43%	21%	6%	736

Solutions offered by residents. Respondents were asked a series of questions about how to improve their situations related to housing, employment, health, education and neighborhood.

Improve housing security. When asked what could improve a respondent's housing security, the top answers among respondents by jurisdiction, race/ethnicity, tenure, income, and other selected housing characteristics were *none of the above* and *help me with a downpayment/purchase.*

The highest proportion of respondents among groups that selected *None of the above* includes:

- Hillsborough residents, 71%
- Owners, 65%
- Income greater than $100,000, 54%
- Foster City residents, 53%
- White, 51%
- Burlingame residents, 50%

The highest proportion of respondents among groups that selected *Help me with a downpayment or purchase* includes:

- Renters, 44%
- Large households, 42%
- Daly City residents, 41%
- Hispanic, 39%
- Precariously housed, 39%
- City of San Mateo residents, 37%

Other solutions to improve housing security identified by several different groups included *Help me with the housing search, help me pay rent each month,* and f*ind a landlord who accepts Section 8.* The highest proportion of respondents among groups that selected these solutions includes:

Help me with the housing search

- Precariously housed, 39%
- Income less than $25,000, 34%
- Income between $25,000-$50,000, 29%

- Half Moon Bay residents, 27%

Help me pay rent each month

- Income less than $25,000, 35%
- Single parent, 31%

Find a landlord who accepts Section 8

- Black or African American, 37%

Improve neighborhood situation. When asked what could improve a respondent's neighborhood situation, nearly every respondent group by jurisdiction, race/ethnicity, tenure, income, and other selected housing characteristics identified *Better lighting.* Other solutions flagged by multiple respondent groups to improve their neighborhood situations includes *Improve street crossings* and *none of the above.*

The highest proportion of respondents among groups that selected *Better lighting* includes:

- East Palo Alto residents, 45%
- Millbrae residents, 45%
- Other race, 42%
- Daly City residents, 41%
- Hispanic, 40%
- Income between $25,000-$50,000, 40%
- Income between $50,000-$100,000, 40%

The highest proportion of respondents among groups that selected *Improve street crossings* includes:

- City of San Mateo residents, 34%
- Single parent, 31%

The highest proportion of respondents among groups that selected *None of the above* includes:

- Foster City residents, 37%
- Hillsborough residents, 36%
- Burlingame residents, 28%

Additionally, 42% of Millbrae respondents chose *Reduce crime,* 40% of Brisbane respondents chose *More stores to meet my needs,* and Belmont (34%) and Half Moon Bay (33%) respondents chose *Build more sidewalks.*

Improve health situation. When asked what could improve a respondent's health situation, the majority of respondent groups by jurisdiction, race/ethnicity, tenure, income, and other selected housing characteristics selected *Make it easier to exercise, More healthy food* and *None of the above.*

The highest proportion of respondents among groups that selected *Make it easier to exercise* includes:

- Redwood City residents, 48%
- Hispanic, 42%
- South San Francisco residents, 41%
- City of San Mateo residents, 41%
- Asian, 41%
- Renters, 40%

The highest proportion of respondents among groups that selected *More healthy food* includes:

- East Palo Alto residents, 48%
- Precariously Housed, 47%
- Single parent, 41%
- Daly City residents, 40%
- Income less than $25,000, 38%
- Black or African American, 37%
- Large Households, 37%

The highest proportion of respondents among groups that selected *None of the above* includes residents from:

- Hillsborough residents, 48%
- Burlingame residents, 47%
- Foster City residents, 42%
- White, 41%
- Owners, 39%

Additionally, African American (34%) and San Bruno (29%) respondents identified *Better access to mental health care* as a solution to help improve their health situations.

Improve job situation. When asked what could improve a respondent's employment situation, the majority of respondent groups by jurisdiction, race/ethnicity, tenure, income, and other selected housing characteristics selected *Increase wages* and *None of the above.*

The highest proportion of respondents among groups that selected *Increase wages* includes:

- Renters, 52%
- Single parents, 50%
- Hispanic, 49%
- Households with children, 49%
- Daly City residents, 49%
- Income between $50,000-$100,000, 49%
- Large households, 48%

The highest proportion of respondents among groups that selected *None of the above* includes:

- Hillsborough residents, 76%
- Owners, 58%
- White, 57%
- Over 65+, 53%
- Income greater than $100,000, 53%
- Foster City residents, 53%

Additionally, 29% of households with income less than $25K identified *Find a job near my apartment or house* as a solution to help improve their situation.

Improve education situation. When asked what could improve a respondent's education situation for their children, the majority of respondent groups by jurisdiction, race/ethnicity, tenure, income, and other selected housing characteristics selected *None of the above, Have more activities,* and *Stop bullying/crime/drug use at school.*

The highest proportion of respondents among groups that selected *None of the above* includes:

- Burlingame residents, 55%

- White, 52%
- Over 65+, 51%
- Hillsborough residents, 49%
- Foster City residents, 46%
- Brisbane residents, 45%

The highest proportion of respondents among groups that selected *Have more activities* includes:

- Single parent, 45%
- Households with children, 41%
- Large households, 41%
- Other race, 37%
- Daly City residents, 34%
- Hispanic, 34%

The highest proportion of respondents among groups that selected *Stop bullying/crime/drug use at school* includes:

- East Palo Alto residents, 38%
- Precariously housed, 31%
- Other race, 30%
- Redwood City residents, 29%
- Hispanic, 29%
- San Mateo residents, 28%

Additionally, 29% of Millbrae respondents identified *Have better teachers at their schools* as a means to improve the education situation in their respective households.

Disparate Access to Educational Opportunities

This section examines the extent to which members of protected classes and those in poverty experience disparities in access to opportunity as measured by access to education. This section draws from data provided by the San Mateo Office of Education, the California Department of Education, and U.S. Census American Community Surveys (ACS). This section discusses the following topics:

- Changes in school enrollment during COVID-19 by race and ethnicity, and by groups with extenuating circumstances;[1]
- Achievement gaps by race and ethnicity and for groups with extenuating circumstances as measured by test scores, California State University or University of California admissions standards, and college-going rates;
- Barriers to success measured by chronic absenteeism, dropout rates, and suspension rates.

After describing this section's primary findings, we describe the county's school districts before launching into data measuring achievement gaps and barriers to success.

Primary Findings

Student racial and ethnic diversity is modestly increasing. Student bodies in San Mateo County have become increasingly racially and ethnically diverse.

- Hispanic students make up the largest ethnic group in the county's schools, representing 38% of students in the 2020-2021 academic school year. This a slight increase from the 2010-2011 school year, where Hispanic students made up 37% of the population.
- There has been a large increase in Asian students, with 17% identifying as such in 2020-2021, an increase of 5 percentage points from 2010-2011.
- Students identifying as White (26%) have decreased by 3 percentage points since 2010-2011.

[1] The term "extenuating circumstances" is used in this section to capture students whose socioeconomic situations and/or disability may make standard educational environments challenging.

Free and reduced lunch-qualifying students and English language learners are concentrated in a handful of schools. Overall, 29% of public school students in San Mateo County qualify for reduced or free lunch.

- The rate of reduced lunch qualification was highest in Ravenswood City Elementary School District, where 83% of students qualify for reduced lunch. Also in Ravenswood City Elementary, 30% of students are experiencing homelessness. This is a large outlier in the county, where overall just 2% are experiencing homelessness.
- Countywide, 20% of public school students are English learners. Again, this rate is highest at Ravenswood City Elementary, where 53% of students are English learners. La Honda-Pescadero Unified School District, Jefferson Union High School, and Redwood City Elementary also have high rates of English learners, representing more than a third of students.

Enrollment is dropping. Public school enrollment reduced substantially in some areas during the pandemic. Total enrollment decreased by 3% between 2019-2020 and 2020-2021 in San Mateo County, which was the largest decrease of the decade.

- Portola Valley and La Honda-Pescadero school districts had the largest enrollment decreases during COVID-19, with a 11% and 10% decline in enrollments, respectively.
- Decreased enrollment was especially common among Pacific Islander students. Between 2019-2021, enrollment among Pacific Islander students decreased by 6% (from 1,581 students in 2019-20 to 1,484 students in 2020-21), substantially higher than the 3% countywide average.
- Enrollment among migrant students decreased drastically by 16% over the same period (from 332 students to 279 students).

Learning proficiency is improving yet disparities exist. Across all racial and ethnic groups, the rate at which students met or exceeded English and mathematics testing standards has increased since the 2014-2015 school year. Students with extenuating circumstances (i.e., disability, facing homelessness, learning English) tend to score lower on English and mathematics tests than the overall student body.

- Proficiency gaps are especially pronounced among English learning students in Portola Valley Elementary, Woodside Elementary, Menlo Park City Elementary, and Brisbane Elementary, where students with extenuating circumstances met or exceeded mathematics test standards at a rate at least 50 percentage points below the overall test rate in each district.
- Students with disabilities in San Carlos Elementary and Las Lomitas Elementary school districts scored far below the overall student body: In these districts, students with disabilities met or exceeded mathematics test standards at 54 percentage points below the overall test rate.

Many students meet admissions standards for CSU or UC schools.

- Among the high school districts in San Mateo County, Sequoia Union had the highest rate of graduates who met such admission standards, at 69%. On the other end of the spectrum, Cabrillo Unified and South San Francisco Unified had the lowest rates at 41%.
- Jefferson Union High School District had the most drastic increase in the share of graduates meeting CSU or UC standards: just 21% of students met these standards in 2016-2017 compared to 48% of students in 2019-2020. La Honda-Pescadero Unified School District experienced a 10 percentage point increase in this success rate over the same period.

Most school districts in the county have a college-going rate at 70% or higher—yet there are wide gaps by race and ethnicity.

- In every district, White students have a higher college-going rate than Hispanic students, but the largest gaps are in South San Francisco United, where 91% of White students go to college compared to just 68% of Hispanic students—a 23 percentage point gap.

Students with extenuating circumstances are highly concentrated in a few schools and move schools often due to housing instability.

- Students with extenuating circumstances may need additional resources—e.g., onsite health care, free meals, tutoring—to be successful in school. When these students are concentrated into a few schools, the schools bear an unequal responsibility for providing needed resources. K-12 school funding in California has long been inadequate, and, although policymakers have recently allocated additional resources to schools with high proportions of low income children under a "concentration grant" system, funding gaps remain.
- The highest concentration of high needs students is found in Ravenswood City Elementary, where 30% of all students are experiencing homelessness and 83% qualify for free and reduced lunch.
- Currently, students whose families have been evicted do not have protections allowing them to remain in their current school district. This can result in frequent changes in schools for low income children, raising their vulnerability to falling behind in school.

Absenteeism, dropout rates, and discipline rates are highest for students of color, students with disabilities, and students with other extenuating circumstances. While 10% of students were chronically absent during the 2018-2019 school year, chronic absenteeism rates were higher in districts with a large number of students experiencing economic and housing precarity.

- For instance, Ravenswood Elementary, which has a 30% rate of homelessness among students, had one of the higher rates of chronic absenteeism at 16%.

- Pacific Islander students (26%), Black/African American students (18%), and Hispanic students (15%) had notably higher rates of chronic absenteeism than the overall student population (10%).
- In most districts, chronic absenteeism is higher among students with disabilities. In fact, only Bayshore Elementary's students with disabilities had a lower rate of chronic absenteeism than the overall student body.

Dropout rates vary across the county:

- Dropout rates were highest in Sequoia Union High School District (10%) and South San Francisco Unified (9%).
- In all school districts in the county, dropout rates are higher for boys than for girls.
- Pacific Islander, Black/African American, and Hispanic students in the county often had higher dropout rates than those in other racial and ethnic groups
- Students with disabilities, students experiencing homelessness, foster youth, and students learning English had higher dropout rates than the overall population.

Discipline rates also vary by area and race and ethnicity.

- In many school districts across San Mateo County, Hispanic students are disciplined at disproportionately higher rates compared to their peers.
- In most districts, Black/African American and Pacific Islander students are also overrepresented in terms of suspension rates, but these rates are slight compared to those of Hispanic students.
- Asian and Filipino students were underrepresented in terms of suspension rates. White students were also underrepresented in discipline rates in most districts except for La Honda-Pescadero.

The demographics of faculty and staff are fairly similar to that of students.

- There is a slightly larger share of White and Black/African American staff than students, meaning that Black/African American and White student groups are more likely to interact with same-race staff and faculty than other racial groups.
- Asian students are less likely to interact with a same-race staff of faculty member: 17% of the student body is Asian compared to just 8% of staff and faculty.

Background

This section describes the school districts in San Mateo County, including their geographic boundaries and a brief history of the school districts' formation. This section also includes details on how districts' enrollments and student demographic have changed over time.

San Mateo County School Districts. There are three unified school districts in San Mateo County which include both elementary and high schools. These are **Cabrillo Unified School District, La Honda-Pescadero Unified School District**, and **South San Francisco Unified School District**.

In addition to the unified school districts, there are three high school districts, which include: **Jefferson Union High School District**, **San Mateo Union High School District**, and **Sequoia Union High School District**. The elementary schools covering these high schools' district boundaries areas are described below:

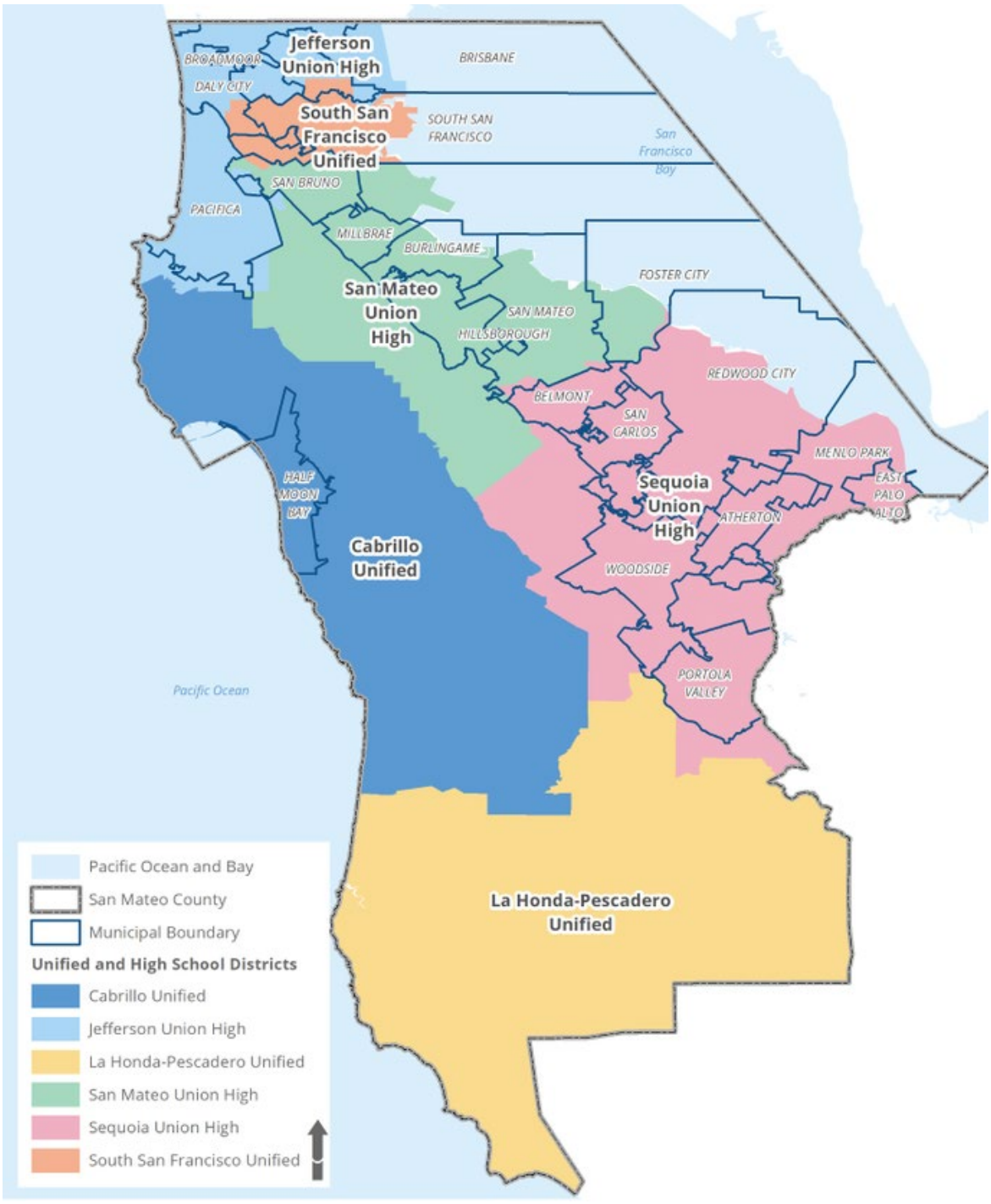
- In the **Jefferson Union High School District** geographic boundary, elementary school districts are the Bayshore Elementary School District, Brisbane School District, Jefferson Elementary School District, and Pacifica School District.

- Within the **San Mateo Union High School District** geographic boundary**,** elementary school districts include San Mateo-Foster City School District, Hillsborough City School District, Burlingame School District, San Bruno Park School District, and Millbrae School District.

- Within the **Sequoia Union High School District** geographic boundary, the elementary schools include Belmont-Redwood Shores School District, San Carlos School District, Redwood City School District, Ravenswood City School District, Menlo Park City School District, Woodside Elementary School District, Las Lomitas Elementary School District, and Portola Valley School District.

Geographic boundaries of school districts. Figure V-1 illustrates the geographic boundaries of the unified school districts as well as the three high school districts. Municipal boundaries are overlayed on the map.

Figure V-1.
Unified School Districts and High School Districts in San Mateo County



Source: San Mateo County Office of Education.

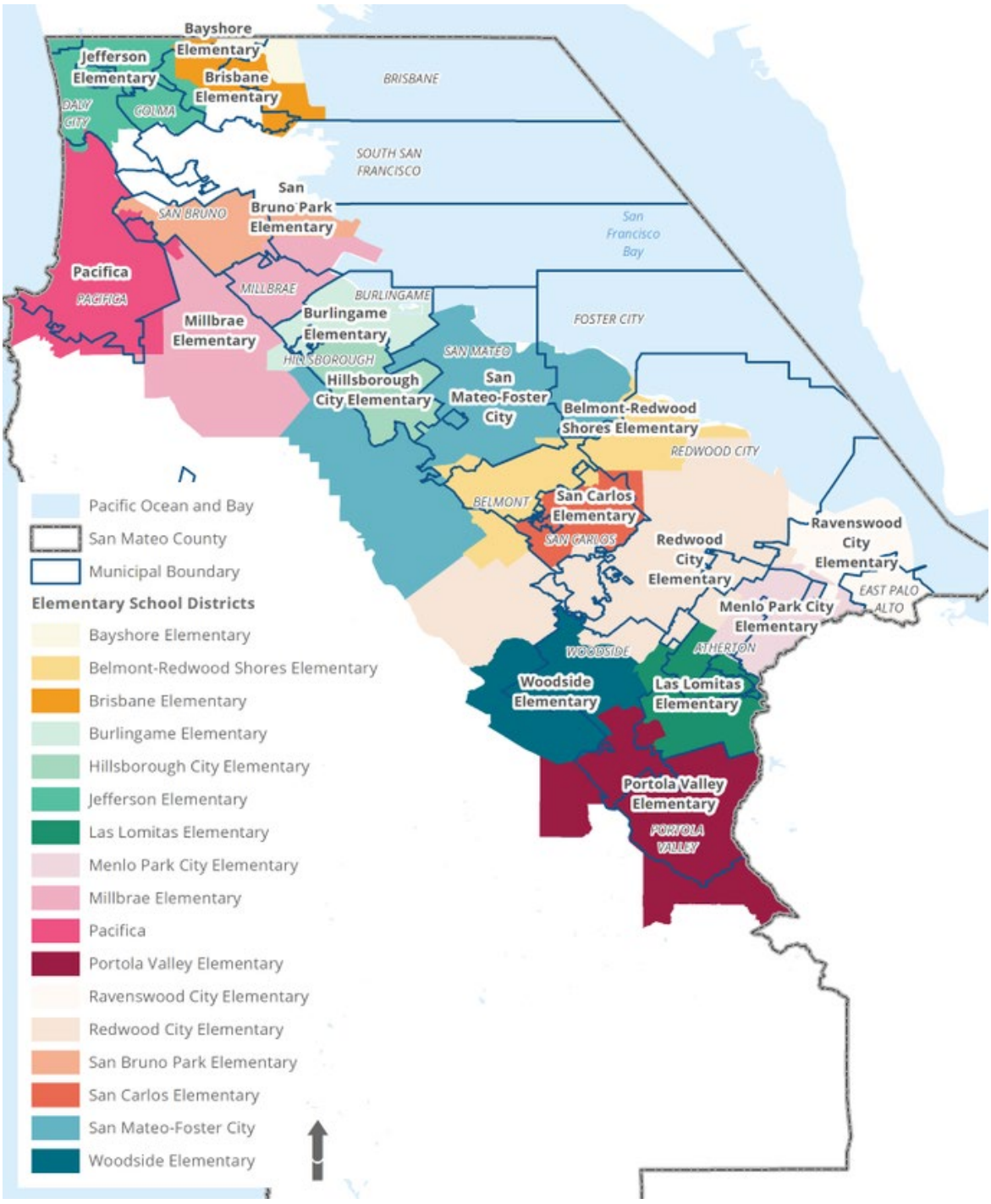
As illustrated in the map, Cabrillo Unified School District covers Half Moon Bay and some unincorporated areas of San Mateo County. South San Francisco Unified covers South San

Francisco and a small portion of Daly City. La Honda-Pescadero Unified School District covers unincorporated areas of San Mateo County.

The other high school districts, Jefferson Union, San Mateo Union, and Sequoia Union, cover the remaining jurisdictions. Jefferson Union covers Brisbane, Colma, Daly City, and Pacifica. San Mateo Union covers Burlingame, Hillsborough, Millbrae, San Bruno, San Mateo City, and Foster City. Sequoia Union covers Atherton, Belmont, Redwood City, East Palo Alto, Menlo Park, San Carlos, Portola Valley, and Woodside.

The county's elementary school districts cover the same areas as the three high school districts. Their geographic boundaries are illustrated in the map below.

Figure V-2.
Elementary School Districts in San Mateo County



Source: San Mateo County Office of Education.

Because the elementary school districts are much smaller, many jurisdictions have several elementary schools. The table blow shows each jurisdiction and their associated elementary school.

Figure V-3.
School Districts in San Mateo County's Jurisdictions

Jurisdiction	Unified or High School District	Elementary School District(s)
Atherton	Sequoia Union	Menlo Park City ; Las Lomitas Elementary; Redwood City
Belmont	Sequoia Union	Belmont-Redwood Shores
Brisbane	Jefferson Union	Brisbane; Bayshore Elementary
Burlingame	San Mateo Union	Burlingame
Colma	Jefferson Union	Jefferson Elementary
Daly City	Jefferson Union; South San Francisco Unified	Jefferson; Bayshore Elementary
East Palo Alto	Sequoia Union	Ravenswood City
Foster City	San Mateo Union	San Mateo-Foster City
Half Moon Bay	Cabrillo Unified	(none, included in Cabrillo Unified)
Hillsborough	San Mateo Union	Hillsborough City
Menlo Park	Sequoia Union	Menlo Park City; Las Lomitas Elementary; Ravenswood City
Millbrae	San Mateo Union	Millbrae
Pacifica	Jefferson Union	Pacifica
Portola Valley	Sequoia Union	Portola Valley
Redwood City	Sequoia Union	Redwood City
San Bruno	San Mateo Union	San Bruno Park
San Carlos	Sequoia Union	San Carlos; Redwood City
San Mateo	San Mateo Union	San Mateo-Foster City
South San Francisco	South San Francisco Unified	(none, included in South San Francisco Unified)
Woodside	Sequoia Union	Woodside Elementary; Portola Valley; Las Lomitas; Redwood City

Source: San Mateo County Office of Education.

A brief history of district formation. San Mateo County's numerous school districts were formed over a century ago, when the county was more rural and scattered: communities needed elementary schools close to home, and only a few students were attending high school. As young people began going to high school, individual districts often found they had too few students and resources to support their own high schools, so

separate high school districts, covering the territories of two or more elementary districts, were established to meet the communities' needs.[2]

Once California's population grew and San Mateo County became more urbanized, "a jigsaw puzzle of overlapping districts evolved haphazardly." Since 1920, the state has been pushing elementary districts to unify with the high school districts that serve their communities, citing improved educational quality and equity of opportunity. However, there has been limited success and local voters in San Mateo County have consistently resisted unification.[3]

Early efforts at unification were more successful in the rural communities along the coast—for example, voters approved the new Cabrillo Unified district for the area around Half Moon Bay and the La Honda-Pescadero Unified district in a 1964 election. Unification was not supported by many suburban communities edging the Bay. The county's school district committee proposed to split each of the three high school districts and feeder schools into two or three smaller unified districts, but the State Board of Education rejected variations of those plans three times. The Board argued that the county committee's proposals would create districts with widely varying property tax bases and could contribute to racial segregation. The State Board instead devised a plan that would create a single unified district within each of the existing high school district boundaries. Voters turned down the state plans in all three districts in June 1966, and rejected a similar proposal again in 1972. In 1973, the Mid-Peninsula Task Force for Integrated Education petitioned the county committees to unify the elementary districts of Menlo Park, Las Lomitas, Portola Valley, Ravenswood and a portion of Sequoia Union High School District across county lines with Palo Alto Unified. Their goal was racial integration, but the county committee did not support the effort.[4]

Efforts against unification have persisted, leaving the county with several elementary school districts which feed into a high school, rather than a unified district. As a result, some elementary school districts have faced waning budgets and administrative hurtles. For instance, Brisbane and Bayshore elementary school districts, at the northern end of the county, serve a little more than 1,000 students and long have struggled with tight budgets. To rectify their budgetary concerns, the districts now share both a superintendent and a chief business officer. They also participate in a special education collaborative with the Jefferson elementary and high school districts.

According to the county's superintendent of schools Anne Campbell, other districts may find themselves pooling their resources in the future: local identification may be strong,

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[2] Watson, Aleta. "How Did We End Up With 54 School Districts in San Mateo and Santa Clara Counties?" Silicon Valley Community Foundation, 2012. https://www.siliconvalleycf.org/sites/default/files/report-edu.pdf

[3] Ibid.

[4] Ibid.

she says, but financial reality is hard to ignore: "As we move forward in time, I think it's going to be interesting to see what school districts are going to do, especially as budgets get more bleak."[5]

Enrollment changes. Total public school enrollment in the county has decreased slightly, by just 1%, from the 2010-2011 academic year to 2020-2021. Figure V-4 illustrates enrollment changes by district.

Bayshore Elementary, Ravenswood City, and Portola Valley school districts experienced the largest enrollment decreases (by at least 30%) between 2010-11 and 2020-21. School districts with the largest increases in enrollments were Burlingame (22%) and Belmont-Redwood Shores (30%).

[5] Ibid.

Figure V-4.
Enrollment changes by district, 2010-11 to 2020-2021

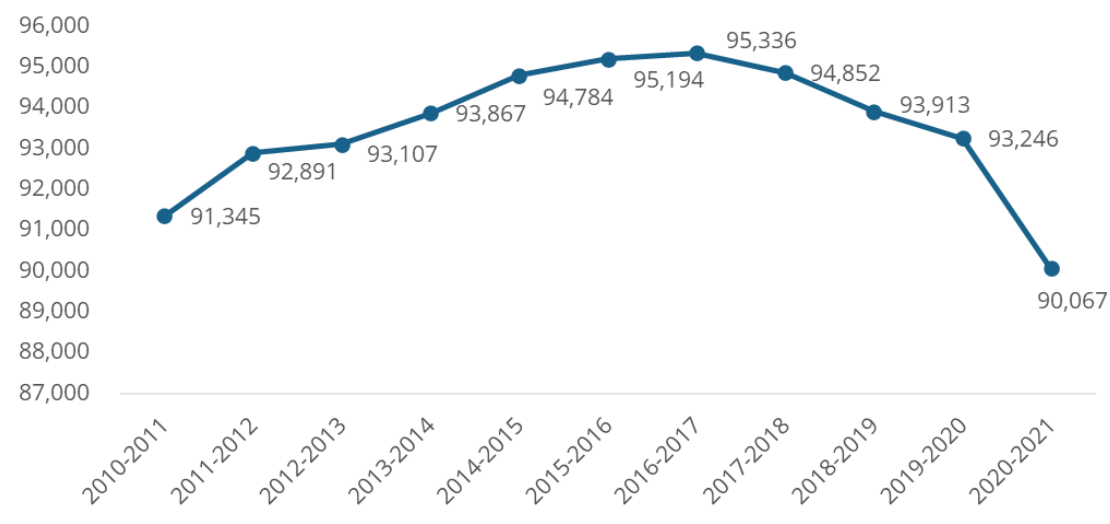
School District	2010-2011 Enrollment	2020-2021 Enrollment	Percent Change
Unified School Districts			
Cabrillo Unified	3,352	2,934	-12%
La Honda-Pescadero	341	275	-19%
South San Francisco	9,312	8,182	-12%
High & Elementary School Districts			
Jefferson Union High School	4,960	4,705	-5%
Bayshore Elementary	543	361	-34%
Brisbane Elementary	545	474	-13%
Jefferson Elementary	6,998	6,653	-5%
Pacifica	3,164	3,006	-5%
San Mateo Union High School	8,406	9,760	16%
Burlingame Elementary	2,771	3,387	22%
Hillsborough City Elementary	1,512	1,268	-16%
Millbrae Elementary	2,222	2,238	1%
San Bruno Park Elementary	2,599	2,275	-12%
San Mateo-Foster City	10,904	10,969	1%
Sequoia Union High School	8,765	10,327	18%
Belmont-Redwood Shores	3,206	4,152	30%
Las Lomitas Elementary	1,336	1,116	-16%
Menlo Park City Elementary	2,629	2,781	6%
Portola Valley Elementary	711	491	-31%
Ravenswood City Elementary	4,285	2,993	-30%
Redwood City Elementary	9,119	8,086	-11%
San Carlos Elementary	3,212	3,265	2%
Woodside Elementary	453	369	-19%
Total Enrollment	91,345	90,067	-1%

Source: California Department of Education and Root Policy Research

However, it is important to note that many of these enrollment decreases were driven by the pandemic. In fact, total enrollment in these public schools decreased by 3% between

2019-2020 and 2020-2021 in San Mateo County: the largest decrease of the decade. As shown in Figure V-5, enrollments actually increased steadily from 2010-2011 to 2017-2018, then began decreasing afterwards.

Figure V-5.
Public School Enrollment Changes, 2010-2011 to 2020-2021



Note: These data exclude enrollments in SBE Everest Public High School District, which in 2015 combined with the Sequoia Union High School District.

Source: California Department of Education and Root Policy Research

Portola Valley and La Honda-Pescadero school districts had the largest enrollment decreases during COVID-19, with a 11% and 10% decline in enrollments, respectively. The only school district with increasing enrollments between the 2019-2020 to 2020-2021 school years was Sequoia Union High School District, with a modest 1% increase in enrollments.

Figure V-6.
Enrollment changes by district during COVID-19, 2019-20 to 2020-21

School District	2019-2020 Enrollment	2020-2021 Enrollment	Percent Change
Unified School Districts			
Cabrillo Unified	3,136	2,934	-6%
La Honda-Pescadero	306	275	-10%
South San Francisco	8,438	8,182	-3%
High & Elementary School Districts			
Jefferson Union High School	4,811	4,705	-2%
Bayshore Elementary	381	361	-5%
Brisbane Elementary	476	474	0%
Jefferson Elementary	6,687	6,653	-1%
Pacifica	3,110	3,006	-3%
San Mateo Union High School	9,885	9,760	-1%
Burlingame Elementary	3,534	3,387	-4%
Hillsborough City Elementary	1,290	1,268	-2%
Millbrae Elementary	2,349	2,238	-5%
San Bruno Park Elementary	2,454	2,275	-7%
San Mateo-Foster City	11,576	10,969	-5%
Sequoia Union High School	10,238	10,327	1%
Belmont-Redwood Shores	4,314	4,152	-4%
Las Lomitas Elementary	1,208	1,116	-8%
Menlo Park City Elementary	2,922	2,781	-5%
Portola Valley Elementary	551	491	-11%
Ravenswood City Elementary	3,269	2,993	-8%
Redwood City Elementary	8,530	8,086	-5%
San Carlos Elementary	3,405	3,265	-4%
Woodside Elementary	376	369	-2%
Total Enrollment	93,246	90,067	-3%

Source: California Department of Education and Root Policy Research.

Declining enrollments in public schools have been common across the state and country during the COVID-19 pandemic, and enrollment declines in San Mateo County are on par

with those across the state. According to a study conducted by the Public Policy Institute of California, public K–12 enrollment declined by 3% in California from the 2019-2020 school year to the 2020-2021 school year. [6]

As funding is tied directly to the number of enrolled pupils, schools in San Mateo County could suffer fiscal consequences with continued declines. By law, districts are "held harmless" for declines for one year—that is, school budgets for 2020–2021 were unaffected, but continued enrollment declines could mean cuts in future years.[7] Reductions in enrollments, and consequently funding, could also worsen economic inequality in the long-term by reducing students' resources and access to opportunities.

Demographics: race & ethnicity. Over the last decade, San Mateo County's school districts have diversified in terms of students' race and ethnicity. Hispanic students make up the largest ethnic group in the county's schools: 38% of students identified as Hispanic in the 2020-2021 academic school year. This is just a one percentage point increase from 2010-2011. Many other students are White (26%), though this has decreased by 3 percentage points since 2010-2011, The largest increase was in Asian students, with 17% identifying as such in 2020-2021, an increase of 5 percentage points from 2010-2011. Other students identify as Filipino (8%), or bi- or multi-racial (8%). A small and decreasing percentage of students identify as Black/African American (1%) and Pacific Islander (2%).

[6] Lafortune, Julien & Prunty, Emmanuel. "Digging into Enrollment Drops at California Public Schools." Public Policy Institute of California. May 14, 2021. https://www.ppic.org/blog/digging-into-enrollment-drops-at-california-public-schools/

[7] Ibid.

Figure V-7.
Changes in Race and Ethnicity, 2010-2011 to 2020-2021

Note: These data exclude enrollments in SBE Everest Public High School District, which in 2015 combined with the Sequoia Union High School District.

Source: California Department of Education and Root Policy Research

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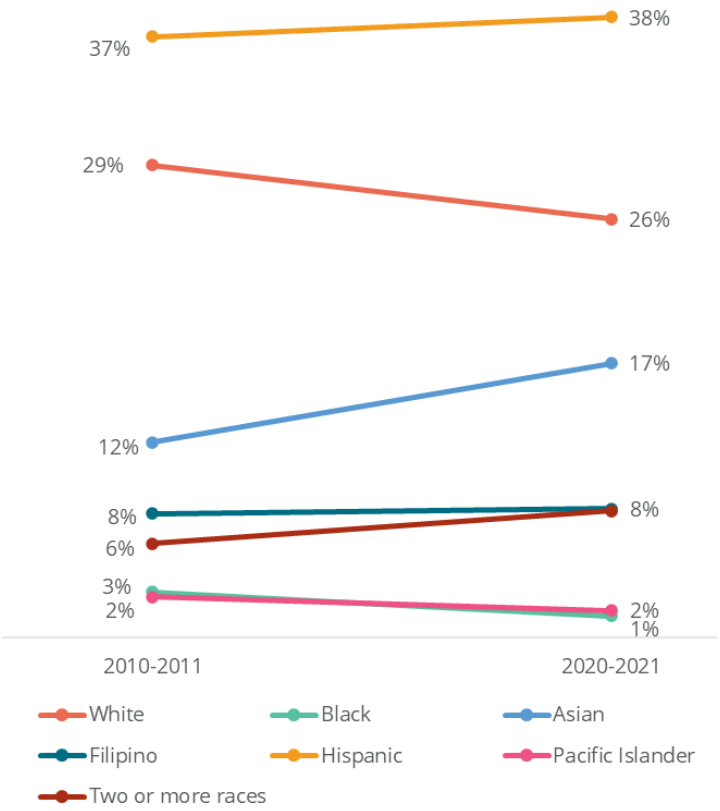


Figure V-8 shows the racial and ethnic distribution of students enrolled in public schools by jurisdiction in 2020-2021.

- Portola Valley Elementary School District (66%) and Woodside Elementary School District (64%) had the highest share of White students, making them among the least racially and ethnically diverse districts in the county.
- Ravenswood City Elementary School District and Redwood City Elementary School District had the highest share of Hispanic students, at 84% and 70%, respectively.
- Ravenswood City also had the highest proportion of Pacific Islander students (7%) and Black/African American students (5%) compared to other districts.
- Millbrae Elementary (46%), Hillsborough Elementary (32%), and Belmont-Redwood Shores Elementary (32%) had the highest share of Asian students.
- Jefferson Elementary School District and Jefferson Union High School District had the highest portion of Filipino students, at 25% and 29% respectively.

Figure V-8.
Student body by Race and Ethnicity, 2020-2021

School District	Asian	Black	Filipino	Hispanic	Pacific Islander	White	Two or more races
Unified School Districts							
Cabrillo Unified	1%	0%	1%	52%	0%	40%	5%
La Honda-Pescadero	0%	0%	1%	63%	0%	35%	1%
South San Francisco	14%	1%	23%	48%	2%	6%	6%
High & Elementary School Districts							
Jefferson Union High School	15%	1%	29%	31%	1%	14%	7%
Bayshore Elementary	19%	3%	21%	41%	4%	3%	8%
Brisbane Elementary	20%	1%	12%	28%	0%	24%	11%
Jefferson Elementary	19%	2%	25%	36%	1%	11%	5%
Pacifica	8%	1%	9%	26%	0%	39%	16%
San Mateo Union High School	23%	1%	5%	32%	2%	28%	10%
Burlingame Elementary	27%	0%	3%	16%	0%	41%	9%
Hillsborough Elementary	32%	0%	2%	5%	0%	48%	12%
Millbrae Elementary	46%	1%	6%	20%	2%	16%	8%
San Bruno Park Elementary	16%	1%	10%	41%	5%	15%	1%
San Mateo-Foster City	26%	1%	3%	37%	2%	21%	9%
Sequoia Union High School	9%	2%	1%	45%	2%	35%	5%
Belmont-Redwood Shores	32%	1%	3%	12%	1%	34%	14%
Las Lomitas Elementary	18%	1%	1%	13%	0%	53%	14%
Menlo Park City Elementary	13%	1%	1%	17%	1%	55%	11%
Portola Valley Elementary	6%	0%	0%	14%	0%	66%	13%
Ravenswood City Elementary	0%	5%	0%	84%	7%	1%	2%
Redwood City Elementary	4%	1%	1%	70%	1%	19%	4%
San Carlos Elementary	18%	1%	1%	14%	0%	49%	13%
Woodside Elementary	4%	2%	0%	16%	1%	64%	11%
Total	17%	1%	8%	38%	2%	26%	8%

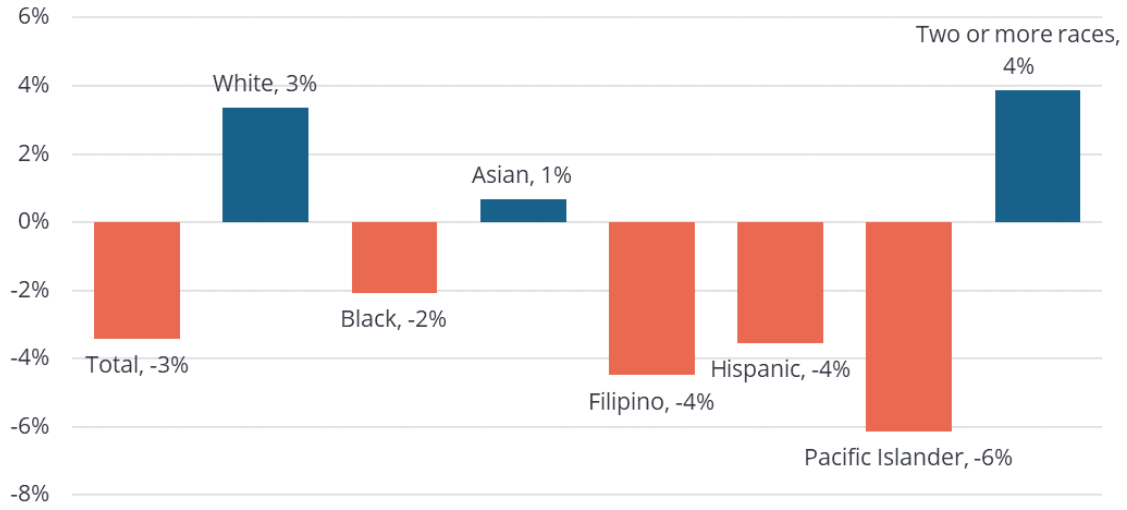
Note: In almost all school districts, less than 1% of students were Native American, so they are not included in this table.

Source: California Department of Education and Root Policy Research

Enrollment changes due to COVID-19 varied by race and ethnicity. For instance, between 2019-2021, enrollment among Pacific Islander students decreased by 6% (from 1,581 students in 2019-20 to 1,484 students in 2020-21). This is substantially higher than the 3% countywide average. Enrollments among Filipino and Hispanic students decreased by 4% while enrollment among Black/African American students decreased by 2%. On the other

end of the spectrum, there was a 3% increase in enrollment among White students (from 22,308 students to 23,055 students) between 2019-20 and 2020-21. Similarly, there was a 1% increase in enrollment among Asian students and a 4% increase among students of two or more races.

Figure V-9.
Enrollment Changes by Race and Ethnicity, San Mateo County, 2019-20 to 2020-21



Source: California Department of Education and Root Policy Research

While many of their families may have simply moved out of San Mateo County during the pandemic, it is possible that Black/African American, Filipino, Hispanic, and Pacific Islander students are otherwise slipping through the cracks of the education system during this period.

Demographics: students with extenuating circumstances. Several students in the county's public schools are facing additional hurtles to educational ease. Many are English learners, qualify for reduced lunch, are foster children, are experiencing homelessness, have a disability, or are migrants. Students in these groups often have hindrances to excelling in school because of detrimental circumstances beyond their control. These include financial and social hardships as well as problems within students' families.

Qualification for free and reduced lunch is often used as a proxy for extenuating circumstances. Qualifications are determined based on household size and income. For instance, in the 2020-2021 academic year, students from a household of three making less

than $40,182 annually qualified for reduced price meals, and those making less than $28,236 in a household of three qualified for free meals.[8]

Free and reduced lunch disparities. Overall, 29% of public school students in San Mateo County qualify for reduced or free lunch. This rate was substantially lower in districts like Hillsborough Elementary, San Carlos Elementary, Portola Valley Elementary, Las Lomitas Elementary, Belmont-Redwood Shores, and Menlo Park City Elementary, where each had less than 10% of students qualify for free or reduced lunch.

The rate of reduced lunch qualification was far higher in Ravenswood City Elementary School District, where 83% of students qualify for reduced lunch.

Disparities in homelessness. In Ravenswood City Elementary, 30% of students are experiencing homelessness. This is an outlier in the county, where overall just 2% are experiencing homelessness. The school district has received media attention due to its astronomically high rate of students experiencing homelessness. Some have noted that rates of homelessness have increased due to escalating costs of living in an area surrounded by affluence.[9] Others have highlighted that ”Having a roof over your head, having a safe place to sleep and study, is fundamental to absolutely everything," and have noted that students who experience homelessness have higher dropout rates and are more likely to experience homelessness as adults.[10]

School moves related to evictions. Currently, students whose families have been evicted do not have protections allowing them to remain in their current school district. This means that precarious housing also means precarious schooling for many of the county’s students. Frequent moves by students are closely related to lower educational proficiency.

In the City of San Francisco, a 2010 ordinance protects some students from being evicted during the school year; however, it only relates to owner/relative move-in evictions.[11] Children in families who are evicted for other reasons may need to move schools or districts when their housing is lost.

English language learners. Countywide, 20% of public school students are English learners. Again, this rate is highest at Ravenswood City Elementary, where 53% of students are English learners. La Honda-Pescadero Unified School District, Jefferson Union High

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[8] “Income Eligibility Scales for School Year 2020-2021.” California Department of Education.

[9] Bartley, Kaitlyn. “Homelessness: The shadow that hangs over students in this Bay Area school district.” The Mercury News. December 2018.

[10] Jones, Carolyn. “California schools see big jump in homeless students.” Palo Alto Online. October 2020.

[11] https://sfrb.org/new-amendment-prohibiting-owner-move-evictions-minor-children-during-school-year

School, and Redwood City Elementary also have high rates of English learners, representing more than a third of students.

Less than one percent of students in San Mateo County public school districts are foster youth or migrants. Cabrillo Unified School District had the highest rate of migrant students at 3%. La Honda-Pescadero had the highest rate of foster children at 2%.

School districts without large low income populations also tend to serve very few English language learners. For instance, in Hillsborough Elementary where 0% of students qualify for reduced lunch, only 1% of students are English language learners.

Figure V-10.
Students with Extenuating Circumstances, 2020-2021

School District	English Learners	Reduced Lunch	Foster Children	Homeless	Migrant
Unified School Districts					
Cabrillo Unified	20%	37%	0%	2%	3%
La Honda-Pescadero	38%	38%	2%	1%	1%
South San Francisco	21%	34%	0%	1%	1%
High & Elementary School Districts					
Jefferson Union High School	36%	44%	0%	0%	0%
Bayshore Elementary	30%	57%	0%	0%	0%
Brisbane Elementary	16%	19%	0%	0%	0%
Jefferson Elementary	14%	27%	0%	1%	0%
Pacifica	9%	18%	0%	1%	0%
San Mateo Union High School	10%	21%	0%	0%	0%
Burlingame Elementary	13%	11%	0%	0%	0%
Hillsborough Elementary	1%	0%	0%	0%	0%
Millbrae Elementary	19%	25%	0%	0%	0%
San Bruno Park Elementary	29%	18%	0%	0%	0%
San Mateo-Foster City	26%	28%	0%	2%	0%
Sequoia Union High School	15%	30%	0%	0%	0%
Belmont-Redwood Shores	10%	7%	0%	0%	0%
Las Lomitas Elementary	7%	6%	0%	0%	0%
Menlo Park City Elementary	6%	7%	0%	0%	0%
Portola Valley Elementary	4%	5%	0%	0%	0%
Ravenswood City Elementary	53%	83%	0%	30%	0%
Redwood City Elementary	38%	56%	0%	2%	1%
San Carlos Elementary	5%	6%	0%	0%	0%
Woodside Elementary	8%	10%	0%	0%	0%
Total	20%	29%	<1%	2%	<1%

Source: California Department of Education and Root Policy Research

The overall share of students in these groups has not changed drastically over time. As shown in Figure V-11, there have been slight decreases in the share of students who are English learners and the share of students who qualify for reduced lunch from 2016-2017

to 2020-2021. Around 2% of students in the county are homeless and this has not changed between 2016-2017 and 2020-2021. Foster youth and migrant students are not shown in the figure, as both have hovered at less than 1% from year to year.

Figure V-11.
Changes in rates of English Leaners, Reduced Lunch, and Homelessness, 2016-2017 to 2020-2021

Note: These data exclude enrollments in SBE Everest Public High School District, which in 2015 combined with the Sequoia Union High School District.

Source: California Department of Education and Root Policy Research

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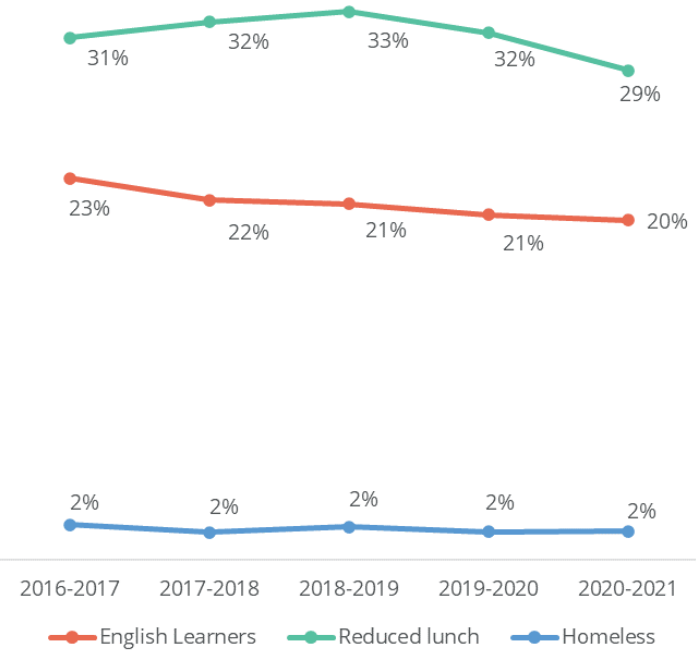
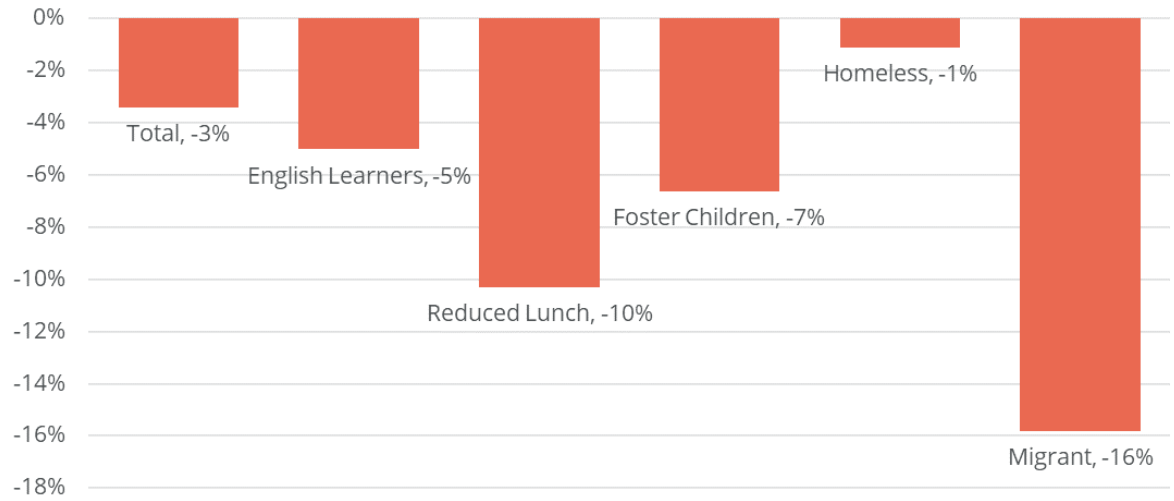


During COVID-19, enrollments decreased by 3% between 2019-2020 and 2020-2021 school years, as families withdrew or did not reenroll their children from public schools. Enrollment among migrant students decreased much more drastically, by 16% (from 332 students to 279 students). Similarly, enrollment among students who qualify for reduced lunch declined at a higher rate (10%) than the overall student population. Foster children and English learners also experienced enrollment decreases at a rate higher than the total population, with 7% and 10% decreases in enrollment, respectively.

Figure V-12.
Enrollment Changes by Extenuating Circumstance, San Mateo County, 2019-2020 to 2020-2021



Source: California Department of Education and Root Policy Research

Achievement Gaps

This section details achievement gaps within school districts. Gaps are measured by test scores, meeting California State University or University of California admissions standards, and college-going rates.

Test scores. Figure V-13 indicates the percent of students who met or exceeded English and mathematics testing standards set by the California State Assessment of Student Performance and Progress. Overall, 62% of students in the county met or exceeded English testing standards and 52% met or exceeded mathematics testing standards.

Of all the districts with high schools, San Mateo Union High School District had the highest student pass rates: 70% of their students met or exceeded standards in English testing and 50% met or exceeded standards in mathematics testing.

Among elementary school districts, Portola Valley Elementary School District and Woodside Elementary School District had the highest rates of success in English, with 87% and 88% of students meeting or exceeding English testing standards, respectively. Woodside Elementary School District and Hillsborough Elementary School District had the highest rates of success in mathematics, with 84% and 85% meeting math testing standards, respectively.

In every school district, girls scored higher on English tests than boys. Overall, girls met or exceeded English testing at a rate of 67% while boys met or exceeded English testing at a rate of 57%. The largest gender gap was in Brisbane Elementary School District, where 72%

of girls met or exceeded English testing standards and just 56% of boys did: a gap of 16 percentage points.

Gender gaps in mathematics were less pronounced, but largest gender gaps were in Cabrillo Unified School District and in La Honda Pescadero Unified School District. In Cabrillo Unified, girls passed mathematics at a rate 7% higher than boys, while in La Honda-Pescadero, boys passed at a rate 6% higher than girls.

Figure V-14.
Students who Met or Exceeded Testing Standards, by Gender and District, 2018-2019

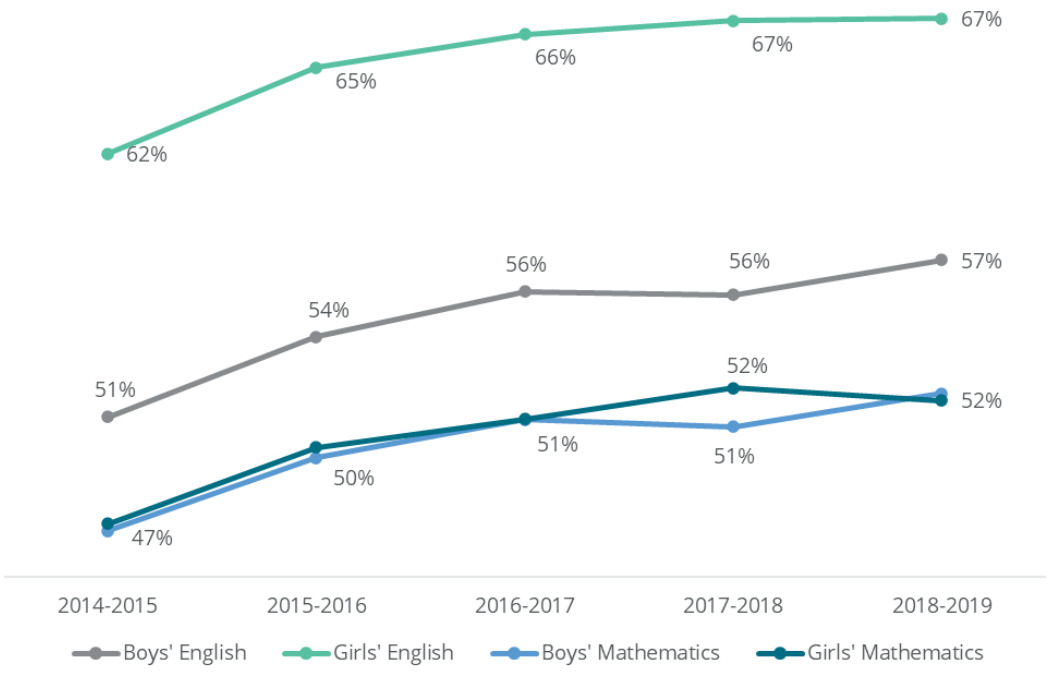
	English Language Arts/Literacy			Mathematics		
District	Total	Boys	Girls	Total	Boys	Girls
Unified School Districts						
Cabrillo Unified	48%	41%	55%	34%	31%	38%
La Honda-Pescadero	43%	36%	49%	31%	34%	28%
South San Francisco	52%	45%	60%	44%	42%	45%
High & Elementary School Districts						
Jefferson Union High School	57%	52%	63%	37%	38%	35%
Bayshore Elementary	27%	24%	31%	27%	27%	28%
Brisbane Elementary	64%	56%	72%	54%	56%	53%
Jefferson Elementary	48%	43%	54%	37%	39%	35%
Pacifica	60%	55%	65%	57%	57%	57%
San Mateo Union High School	70%	66%	76%	50%	50%	50%
Burlingame Elementary	80%	75%	84%	78%	78%	78%
Hillsborough Elementary	85%	81%	89%	85%	86%	84%
Millbrae Elementary	63%	57%	70%	58%	58%	58%
San Bruno Park Elementary	50%	47%	53%	41%	43%	38%
San Mateo-Foster City	62%	58%	67%	56%	56%	56%
Sequoia Union High School	68%	64%	72%	50%	50%	50%
Belmont-Redwood Shores	82%	78%	86%	79%	78%	80%
Las Lomitas Elementary	86%	84%	88%	82%	84%	80%
Menlo Park City Elementary	84%	81%	87%	83%	82%	83%
Portola Valley Elementary	87%	83%	91%	83%	84%	82%
Ravenswood City Elementary	22%	20%	23%	15%	16%	13%
Redwood City Elementary	54%	49%	59%	46%	46%	46%
San Carlos Elementary	80%	77%	83%	75%	76%	74%
Woodside Elementary	88%	85%	91%	84%	85%	83%
Total	62%	57%	67%	52%	52%	52%

Source: California Department of Education, California Assessment of Student Performance and Progress, and Root Policy Research

The gender gap in test scores has started to close in recent years, as indicated in Figure V-15. In 2014-2015 there was a 11 percentage point gap in girls' and boys' English testing pass

rates, and by 2018-2019 this was just a 10 percentage point gap. The figure also indicates that there have been steady gains in the share of students meeting or exceeding testing standards in the county.

Figure V-15.
Students who Met or Exceeded Testing Standards, by Gender, 2014-2015 to 2018-2019



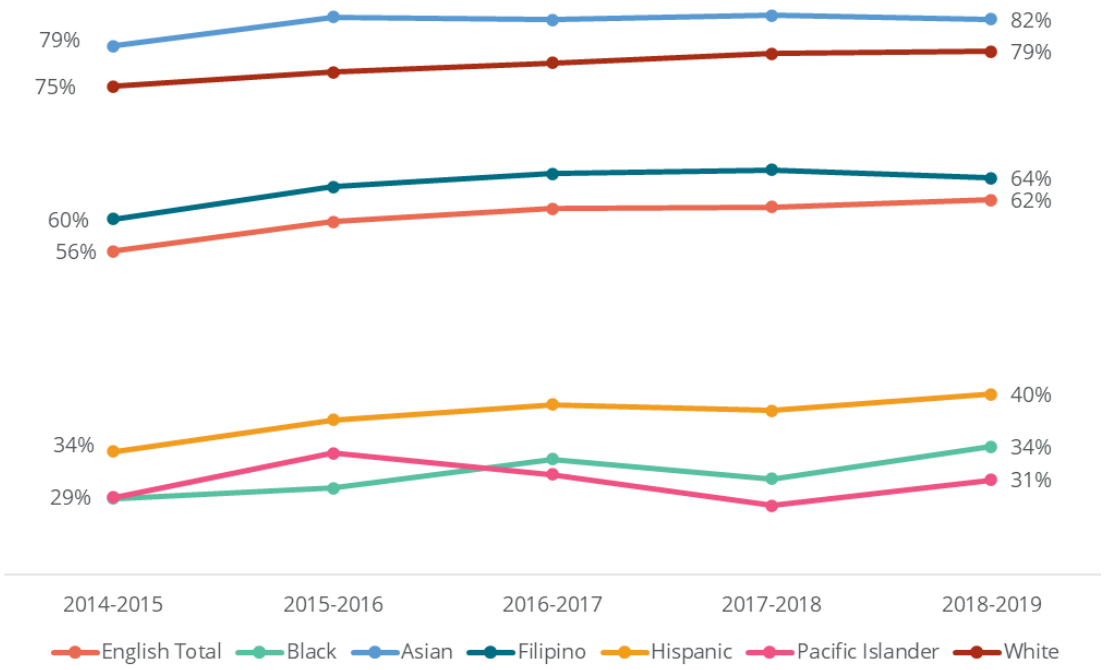
Source: California Department of Education, California Assessment of Student Performance and Progress, and Root Policy Research

Very large gaps in test scores by race and ethnicity exist among students in some areas. Figure V-16 illustrates the rate at which students of various racial and ethnic groups met or exceeded English testing standards.

For the past five years in San Mateo County, Asian, White, and Filipino students have met or exceeded English testing standards at rates higher than the overall student population. Hispanic, Black/African American, and Pacific Islander students, on the other hand, have been underserved in this realm and have consistently scored lower than the overall student body.

However, across all groups, the rate at which students met or exceed English testing standards has increased since the 2014-2015 school year. Hispanic students have made the largest percentage point gain: 34% met standards in 2014-2015 and 40% met standards in 2019-19, an increase of six percentage points.

Figure V-16.
Students who Met or Exceeded English Testing Standards, by Race and Ethnicity, 2014-2015 to 2018-2019

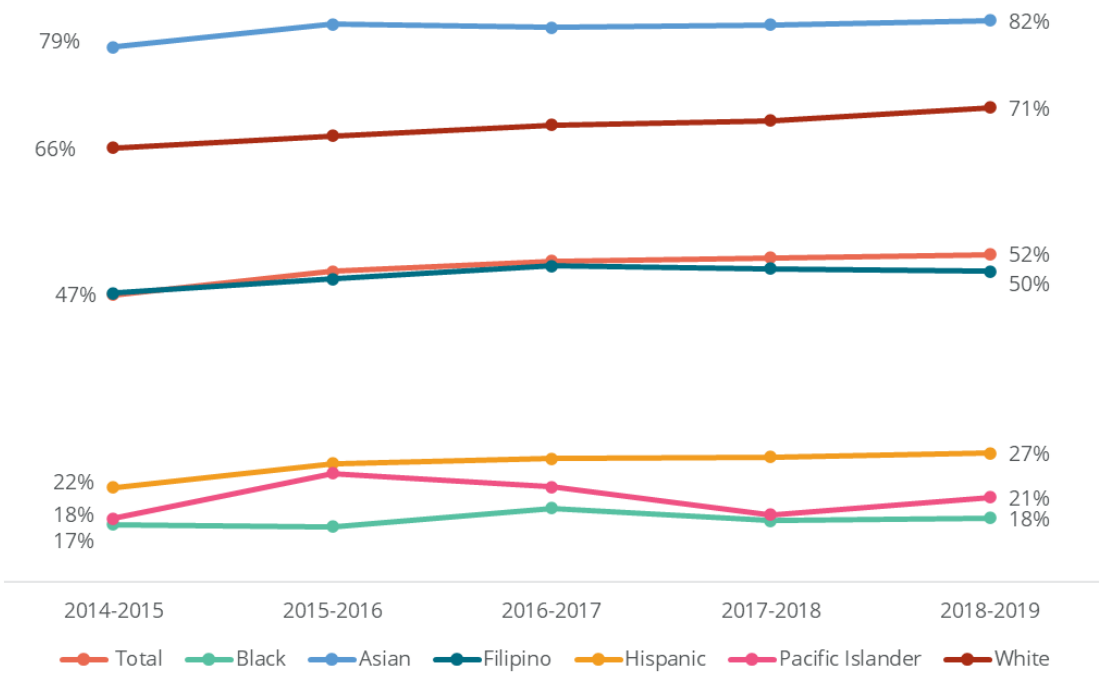


Source: California Department of Education, California Assessment of Student Performance and Progress, and Root Policy Research

A similar narrative holds in Math testing standards, where scores have improved among each racial and ethnic group from 2014-2015 to 2018-2019. Again, White and Asian students meet or exceed math testing standards at rates higher than the overall population while Hispanic, Pacific Islander, and Black/African American students scored lower.

White and Hispanic students have seen the biggest increases in rates of mathematics success: both have experienced a five percentage point increase in the percent of students who met or exceeded math testing standards.

Figure V-17.
Students who Met or Exceeded mathematics testing standards, by Race and Ethnicity, 2014-2015 to 2018-2019



Source: California Department of Education, California Assessment of Student Performance and Progress, and Root Policy Research

Figure V-18 illustrates the rates at which students of various racial and ethnic groups met or exceeded mathematics testing standards by district.

There were several districts in which the gaps between the overall test pass rates and a specific racial groups' pass rates were especially wide. For instance, in San Carlos Elementary School District, 75% of the total student body met or exceeded math testing standards, but only 11% of Black/African American students met or exceeded math testing standards— a gap of 64 percentage points.

Other school districts with wide gaps between Black/African American and overall math testing success were Las Lomitas Elementary (46 percentage point gap), Menlo Park City Elementary (43 percentage point gap), and Belmont-Redwood Shores (42 percentage point gap).

Some school districts also had similar gaps in Pacific Islander students' math passing rates and overall passing rates. For instance, in Menlo Park City Elementary School District, 83% of the student body met or exceeded mathematics testing standards but just 35% of Pacific Islander students passed or exceeded mathematics testing standards—a gap of 48

percentage points. Millbrae Elementary School District also had a 47 percentage point gap between Pacific Islander students' and total students' math test rates.

Figure V-18.
Students who Met or Exceeded Mathematics Testing Standards, by Race/Ethnicity and District, 2018-2019

School District	Overall	Asian	Black	Filipino	Hispanic	Pacific Islander	White
Unified School Districts							
Cabrillo Unified	34%	65%	(no data)	38%	16%	(no data)	54%
La Honda-Pescadero	31%	(no data)	(no data)	(no data)	20%	(no data)	46%
South San Francisco	44%	75%	19%	60%	29%	33%	46%
High & Elementary School Districts							
Jefferson Union High School	37%	75%	(no data)	36%	17%	(no data)	42%
Bayshore Elementary	27%	44%	(no data)	38%	17%	14%	(no data)
Brisbane Elementary	54%	67%	(no data)	65%	38%	(no data)	60%
Jefferson Elementary	37%	61%	15%	42%	23%	20%	30%
Pacifica	57%	74%	38%	48%	38%	(no data)	66%
San Mateo Union High School	50%	84%	(no data)	46%	22%	20%	63%
Burlingame Elementary	78%	92%	53%	66%	50%	(no data)	81%
Hillsborough Elementary	85%	92%	(no data)	(no data)	76%	(no data)	82%
Millbrae Elementary	58%	75%	31%	63%	27%	11%	51%
San Bruno Park Elementary	41%	69%	23%	64%	25%	27%	50%
San Mateo-Foster City	56%	87%	30%	61%	23%	27%	69%
Sequoia Union High School	50%	81%	18%	53%	22%	11%	76%
Belmont-Redwood Shores	79%	92%	37%	77%	52%	43%	79%
Las Lomitas Elementary	82%	93%	36%	(no data)	44%	(no data)	87%
Menlo Park City Elementary	83%	94%	40%	(no data)	55%	35%	88%
Portola Valley Elementary	83%	89%	(no data)	(no data)	56%	(no data)	89%
Ravenswood City Elementary	15%	(no data)	9%	(no data)	15%	11%	(no data)
Redwood City Elementary	46%	92%	22%	76%	34%	44%	75%
San Carlos Elementary	75%	91%	11%	85%	51%	(no data)	78%
Woodside Elementary	84%	92%	(no data)	(no data)	52%	(no data)	89%
Total	52%	82%	18%	50%	27%	21%	71%

Source: California Department of Education, California Assessment of Student Performance and Progress, and Root Policy Research

Although racial gaps in English testing were less pronounced, San Carlos Elementary School District also had a wide gap between the total student body and Black/African American

students. Namely, 80% of the student body met or exceeded English testing standards, but only 19% of Black/African American students met or exceeded testing standards—a 61 percentage point gap. Las Lomitas Elementary had a 41 percentage point gap between overall English testing success and Black/African American English testing success.

Other districts had large gaps between the total student body's English test scores and Pacific Islander students' test scores. Namely, in Menlo Park City Elementary School District 84% of students met or exceeded English testing standards, but only 40% of Pacific Islander students—a 44 percentage point gap.

Figure V-19.
Students who Met or Exceeded English Testing Standards, by Race/Ethnicity and District, 2018-2019

School District	Overall	Asian	Black	Filipino	Hispanic	Pacific Islander	White
Unified School Districts							
Cabrillo Unified	48%	78%	(no data)	54%	28%	(no data)	71%
La Honda-Pescadero	43%	(no data)	(no data)	(no data)	27%	(no data)	61%
South San Francisco	52%	76%	36%	66%	38%	44%	56%
High & Elementary School Districts							
Jefferson Union High School	57%	81%	(no data)	60%	43%	(no data)	59%
Bayshore Elementary	27%	49%	(no data)	33%	20%	14%	(no data)
Brisbane Elementary	64%	63%	(no data)	75%	51%	(no data)	79%
Jefferson Elementary	48%	62%	28%	59%	34%	33%	43%
Pacifica	60%	65%	32%	52%	45%	(no data)	68%
San Mateo Union High School	70%	88%	55%	79%	50%	34%	81%
Burlingame Elementary	80%	88%	61%	73%	55%	(no data)	83%
Hillsborough Elementary	85%	89%	(no data)	(no data)	77%	(no data)	83%
Millbrae Elementary	63%	74%	46%	68%	42%	23%	61%
San Bruno Park Elementary	50%	72%	39%	76%	36%	31%	56%
San Mateo-Foster City	62%	85%	41%	68%	34%	37%	77%
Sequoia Union High School	68%	87%	44%	92%	47%	31%	88%
Belmont-Redwood Shores	82%	91%	44%	81%	64%	61%	83%
Las Lomitas Elementary	86%	91%	45%	(no data)	65%	(no data)	89%
Menlo Park City Elementary	84%	92%	60%	(no data)	62%	40%	88%
Portola Valley Elementary	87%	92%	(no data)	(no data)	58%	(no data)	93%
Ravenswood City Elementary	22%	(no data)	24%	(no data)	21%	18%	(no data)
Redwood City Elementary	54%	91%	35%	73%	43%	47%	83%
San Carlos Elementary	80%	90%	19%	76%	60%	(no data)	83%
Woodside Elementary	88%	92%	(no data)	(no data)	58%	(no data)	92%
Total	62%	82%	34%	64%	40%	31%	79%

Source: California Department of Education, California Assessment of Student Performance and Progress, and Root Policy Research

Students with extenuating circumstances across all districts met or exceeded testing standards at lower rates. However, some districts had especially wide disparities between overall test scores and test scores of students with extenuating circumstances.

For example, English learning students in Portola Valley Elementary, Woodside Elementary, Menlo Park City Elementary, and Brisbane Elementary each met or exceeded mathematics test standards at a rate at least 50 percentage points below the overall test rate in each district. English learning students in Las Lomitas Elementary (54%) had the highest mathematics pass rates, followed by those in Belmont-Redwood Shores (42%) and Burlingame Elementary (40%).

Students with disabilities scored especially high on mathematics tests in Hillsborough Elementary, where 48% met or exceeded standards. Others in Belmont-Redwood Shores (43%) and Woodside Elementary (41%) had high pass rates as well. Students with disabilities in San Carlos Elementary and Las Lomitas Elementary school districts scored far below the overall student body: in these districts, students with disabilities met or exceeded mathematics test standards at 54 percentage points below the overall test rate.

In Jefferson Elementary and Ravenswood Elementary students experiencing homelessness passed math tests at a rate similar to their housed peers. In other districts, however, students experiencing homelessness often scored substantially lower. School districts with the widest math testing gaps between the overall student body and students experiencing homelessness were San Mateo-Foster City and Millbrae Elementary, with a 41 percentage point gap and 42 percentage point gap, respectively.

Figure V-20.
Students who Met or Exceeded Math Testing Standards, by Special Case and District, 2018-2019

School District	Overall	English Learners	Experiencing homelessness	Migrant	With Disabilities
Unified School Districts					
Cabrillo Unified	34%	4%	5%	4%	9%
La Honda-Pescadero	31%	4%	(no data)	(no data)	2%
South San Francisco	44%	20%	25%	4%	18%
High & Elementary School Districts					
Jefferson Union High School	37%	5%	(no data)	(no data)	6%
Bayshore Elementary	27%	11%	(no data)	(no data)	9%
Brisbane Elementary	54%	4%	(no data)	(no data)	12%
Jefferson Elementary	37%	15%	36%	(no data)	11%
Pacifica	57%	22%	(no data)	(no data)	17%
San Mateo Union High School	50%	10%	(no data)	(no data)	13%
Burlingame Elementary	78%	40%	(no data)	(no data)	29%
Hillsborough Elementary	85%	(no data)	(no data)	(no data)	48%
Millbrae Elementary	58%	26%	16%	(no data)	25%
San Bruno Park Elementary	41%	12%	(no data)	(no data)	9%
San Mateo-Foster City	56%	11%	15%	(no data)	14%
Sequoia Union High School	50%	3%	33%	(no data)	9%
Belmont-Redwood Shores	79%	42%	(no data)	(no data)	43%
Las Lomitas Elementary	82%	54%	(no data)	(no data)	28%
Menlo Park City Elementary	83%	31%	(no data)	(no data)	38%
Portola Valley Elementary	83%	14%	(no data)	(no data)	39%
Ravenswood City Elementary	15%	5%	11%	(no data)	2%
Redwood City Elementary	46%	14%	(no data)	29%	14%
San Carlos Elementary	75%	24%	(no data)	(no data)	21%
Woodside Elementary	84%	27%	(no data)	(no data)	41%

Source: California Department of Education, California Assessment of Student Performance and Progress, and Root Policy Research

Students with extenuating circumstances also consistently scored lower in English testing than the overall student body.

For instance, English learning students in San Mateo Union High School District, Hillsborough Elementary School District, Sequoia Union High School District, Menlo Park City Elementary School District, and Portola Valley Elementary School District met or exceeded English test standards at a rate at least 60 percentage points below the overall test rate in each district. Hillsborough Elementary had the largest gap at 85 percentage points. Las Lomitas Elementary had the highest success rate among English learners, where 50% met or exceeded English testing standards.

However, students with disabilities in Las Lomitas Elementary and San Carlos Elementary school districts met or exceeded English test standards at rate 55 and 51 percentage points below the overall test rate, respectively. These were the largest gaps in the county. Students with disabilities at Woodside Elementary did the best on English testing, where 56% passed or exceeded standards.

Among students experiencing homelessness, those at Sequoia Union High School were most likely to meet English testing standards, with 42% meeting or exceeding standards. The school district with the widest gap between overall English test scores and scores among students experiencing homelessness was Cabrillo Unified with a 34 percentage point gap.

Just three districts reported English testing scores among migrant students. Redwood City Elementary had the highest pass rate at 34% and Cabrillo Unified had the lowest at 16%.

Figure V-21.
Students who Met or Exceeded English Testing Standards, by Special Case and District, 2018-2019

School District	Overall	English Learners	Experiencing homelessness	Migrant	With Disabilities
Unified School Districts					
Cabrillo Unified	48%	9%	14%	16%	12%
La Honda-Pescadero	43%	9%	(no data)	(no data)	9%
South San Francisco	52%	21%	35%	20%	18%
High & Elementary School Districts					
Jefferson Union High School	57%	3%	(no data)	(no data)	19%
Bayshore Elementary	27%	3%	(no data)	(no data)	4%
Brisbane Elementary	64%	21%	(no data)	(no data)	16%
Jefferson Elementary	48%	16%	30%	(no data)	15%
Pacifica	60%	12%	(no data)	(no data)	15%
San Mateo Union High School	70%	11%	(no data)	(no data)	27%
Burlingame Elementary	80%	33%	(no data)	(no data)	33%
Hillsborough Elementary	85%	(no data)	(no data)	(no data)	47%
Millbrae Elementary	63%	19%	34%	(no data)	23%
San Bruno Park Elementary	50%	14%	(no data)	(no data)	12%
San Mateo-Foster City	62%	9%	33%	(no data)	15%
Sequoia Union High School	68%	8%	42%	(no data)	27%
Belmont-Redwood Shores	82%	31%	(no data)	(no data)	45%
Las Lomitas Elementary	86%	51%	(no data)	(no data)	31%
Menlo Park City Elementary	84%	21%	(no data)	(no data)	42%
Portola Valley Elementary	87%	17%	(no data)	(no data)	37%
Ravenswood City Elementary	22%	6%	16%	(no data)	5%
Redwood City Elementary	54%	13%	(no data)	34%	16%
San Carlos Elementary	80%	29%	(no data)	(no data)	28%
Woodside Elementary	88%	18%	(no data)	(no data)	56%

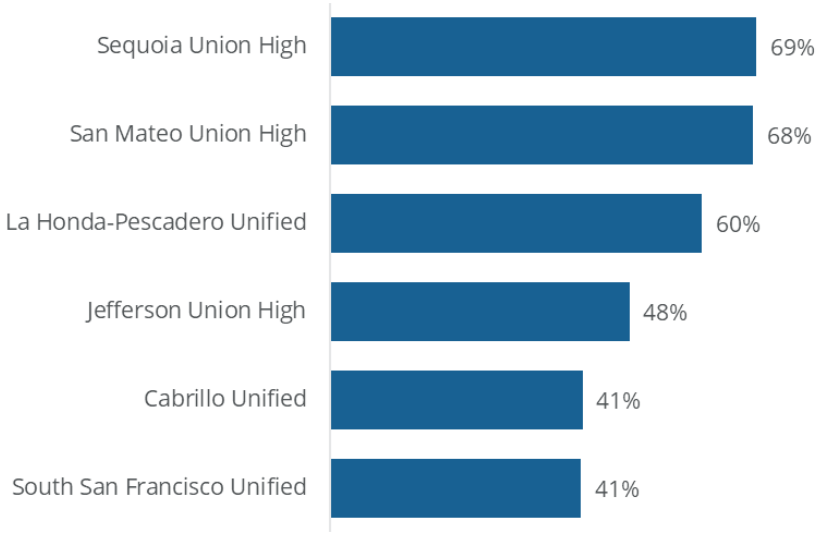
Source: California Department of Education, California Assessment of Student Performance and Progress, and Root Policy Research

Students who met university requirements. Many high schoolers in the county met admission standards for a University of California (UC) or California State University (CSU) school. Figure V-22 illustrates the percentage of cohort graduates who met admission requirements for a CSU or UC school according to California Department of Education data.

Of the high school districts in San Mateo County, Sequoia Union had the highest rate of graduates who met such admission standards, at 69%. On the other end of the spectrum, Cabrillo Unified and South San Francisco Unified had the lowest rates at 41%.

Figure V-22. Students Meeting California University Admission Standards, 2019-2020

Source:
California Department of Education and Root Policy Research.



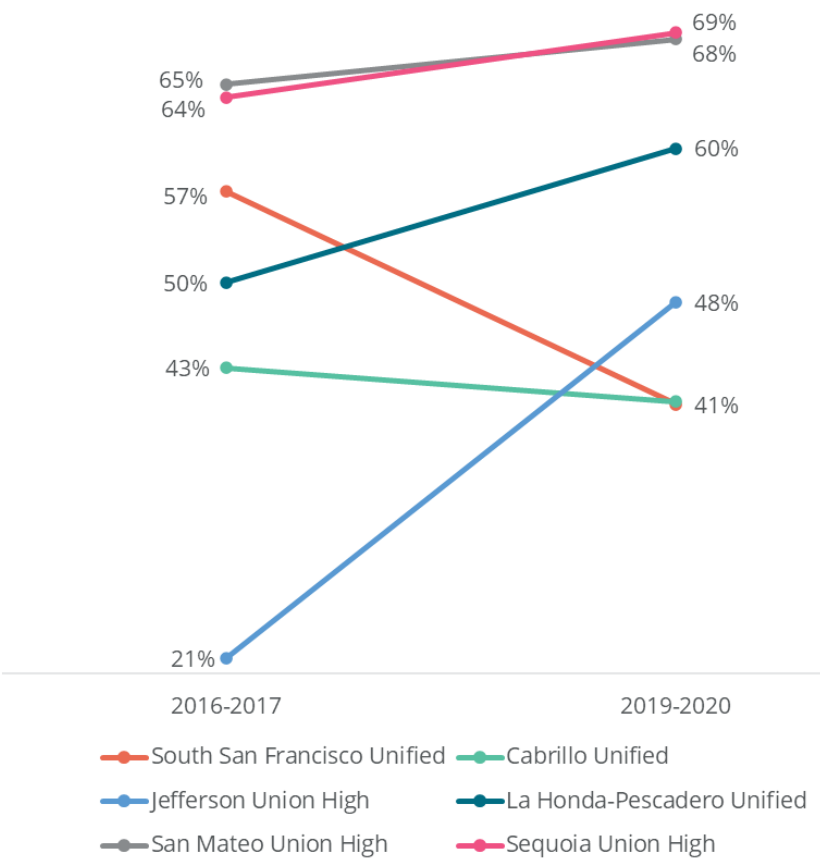
Cabrillo Unified and South San Francisco Unified have experienced a decrease in the share of graduates meeting CSU or UC admission standards in recent years. For instance, in 2016-2017, 57% of South San Francisco Unified graduates met these standards, but this decreased by 16 percentage points by 2019-2020. Cabrillo Unified experienced a less drastic decrease over the same period, but the rate still shrunk by two percentage points.

Jefferson Union High School District had the most drastic increase in the share of graduates meeting CSU or UC standards: just 21% of students met these standards in 2016-2017 compared to 48% of students in 2019-2020. La Honda-Pescadero Unified School District experienced a 10 percentage point increase in this success rate over the same period.

Sequoia Union and San Mateo Union experienced more modest increases, but remain the districts with the highest rates of students meeting CSU and UC standards.

Figure V-23. Students Meeting University Admission Standards, 2016-2017 and 2019-2020

Source:
California Department of Education and Root Policy Research.



Rates at which students met CSU or UC admissions standards varied substantially by race and ethnicity in 2019-2020. In all high school districts in San Mateo County, White and Asian students meet CSU and UC admissions standards at higher rates than the overall student population.

The largest gap is in South San Francisco Unified, where just 41% of students meet CSU or UC admissions standards, but 73% of Asian students meet those standards—a 32 percentage point gap.

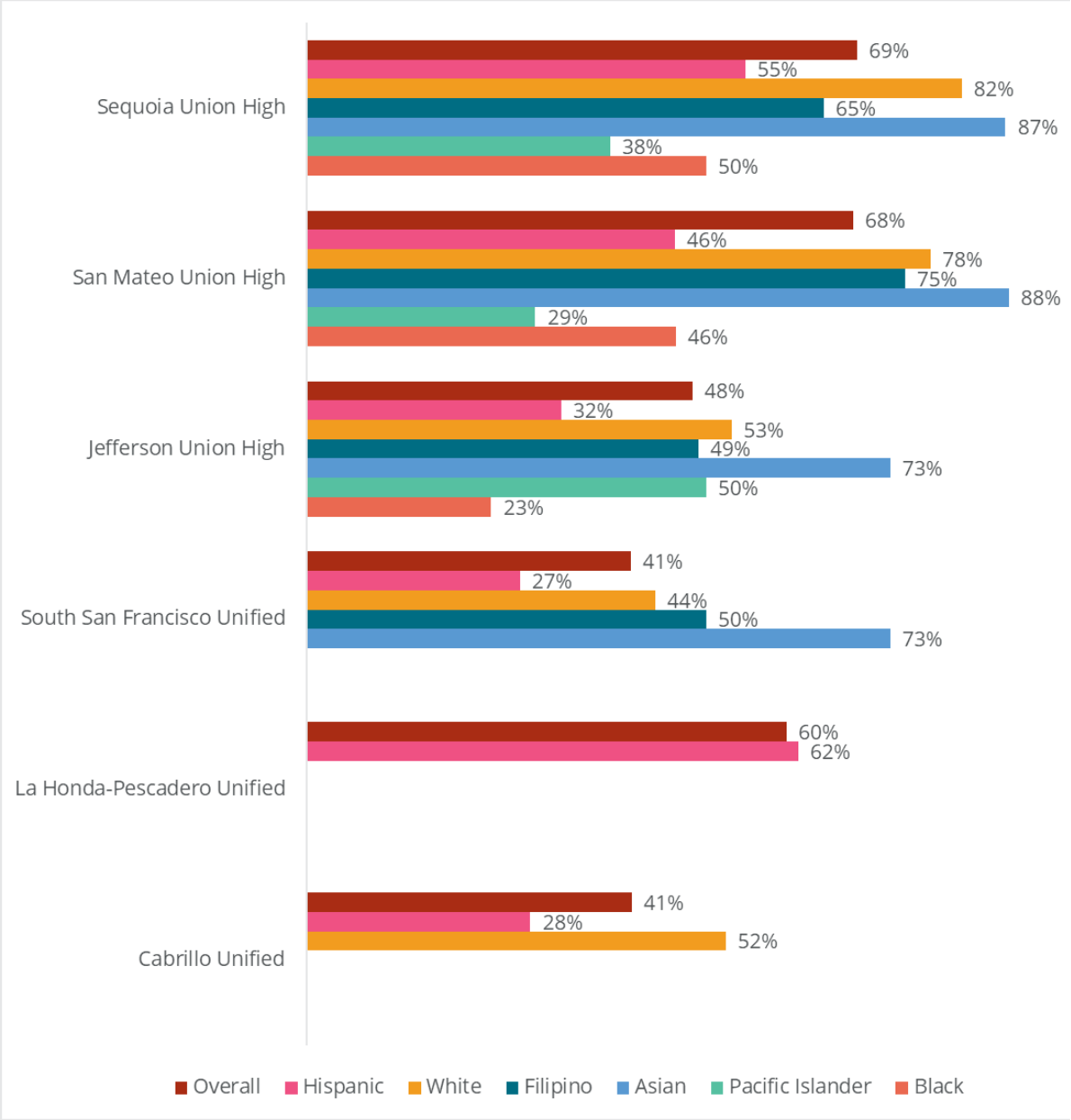
On the other end of the spectrum, Black/African American students typically met CSU or UC admissions standards at lower-than-average rates. The largest gap was in San Mateo Union, where just 29% of Black/African American students met CSU or UC standards compared to 68% of students in the district overall.

Filipino students typically met admissions standards at rates similar to the overall student body. For instance, in Jefferson Union, San Mateo Union, and South San Francisco Unified, Filipino students are slightly more likely to have meet CSU and UC standards than the overall student population. In Sequoia Union, they are slightly less likely to have met admission standards than the overall student population.

In La Honda-Pescadero, Hispanic students are slightly more likely to have met CSU or UC standards than the overall student body. However, in all other school districts, Hispanic students are less likely to have met CSU and UC standards than the overall student body. The largest disparity is in San Mateo Union, where just 46% of Hispanic students meet the university admissions standards compared to 68% of students overall.

Finally, Pacific Islander students in Jefferson Union were slightly more likely to have met California university admissions standards compared to the overall student body, but in Sequoia Union and San Mateo Union they were substantially less likely.

Figure V-24.
Students Meeting University Admission Standards, by Race and Ethnicity, 2019-2020



Source: California Department of Education and Root Policy Research

As expected, students with extenuating circumstances were less likely to meet CSU or UC admissions standards than students in the county overall. In all school districts where data are available, students with disabilities, students experiencing homelessness, English learners, foster youth, and migrant students met CSU or UC admission standards at lower rates than the overall student population.

English learners in Sequoia Union and San Mateo Regional met CSU or UC admission standards at higher rates than their peers in other school districts. However, compared to the overall student body within their own school districts, they had a larger gap than other districts. Namely, in Sequoia Union, 69% of students met admissions standards compared to just 32% of students learning English— a 37 percentage point gap.

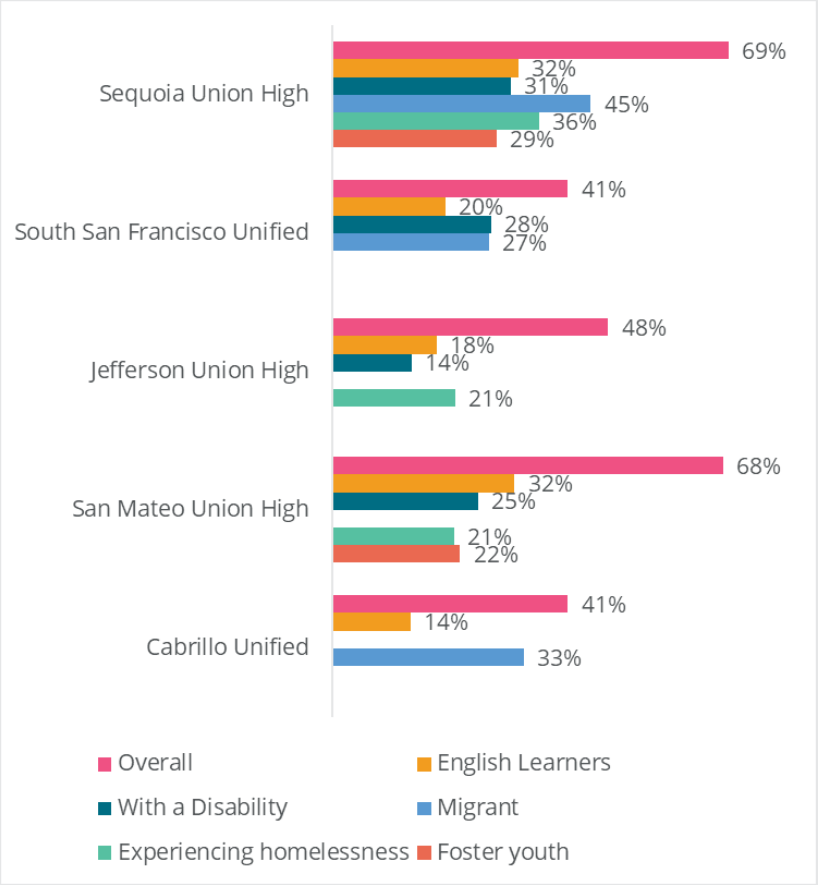
Similarly, students with disabilities in Sequoia Union had the highest rate of meeting admissions standards (31%) compared to peers with disabilities in other districts, but also had the largest gap (38 percentage points) compared to the district's overall student body.

Migrant students met admission standards at the lowest rate in South San Francisco Unified (27%) and at the highest rate in Sequoia Union (45%). However, in Cabrillo Unified, their rates were only eight percentage points lower than that of the overall student body, the smallest gap in the county.

Approximately 36% of students experiencing homelessness in Sequoia Union met CSU or UC admission standards, which was higher than rates in San Mateo Union (21%) and Jefferson Union (21%).

Just San Mateo Union and Sequoia Union had enough foster youth to report their rate of meeting CSU or UC admission standards. In Sequoia Union, 29% met admissions standards and 22% in San Mateo Union met admissions standards.

Figure V-25. Students Meeting University Admission Standards, 2019-2020



Source:

California Department of Education and Root Policy Research.

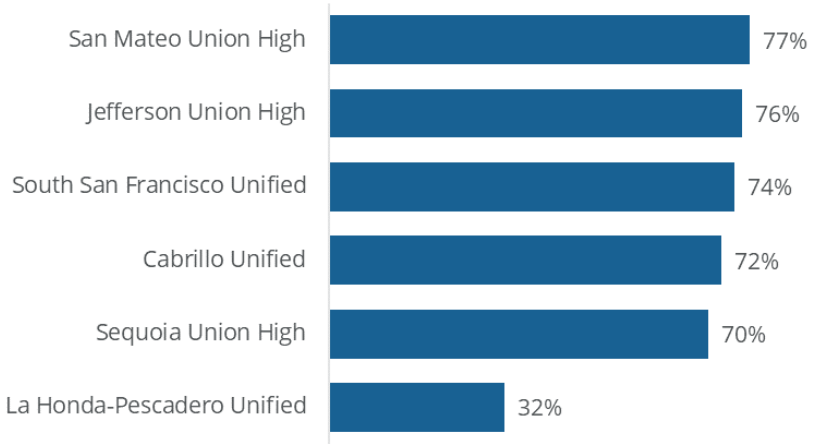
Notes; La-Honda Pescadero Unified is excluded from these data as they do not report admission standards data for these special groups, likely due to small sample size.

College-going rates. The college-going rate is defined as the percentage of public high school students who completed high school in a given year and subsequently enrolled in any public or private postsecondary institution (in-state or out-of-state) in the United States within 12 or 16 months of completing high school.

Most school districts in the county have a college-going rate at 70% or higher. San Mateo Union had the highest college-going rate at 77%. La Honda-Pescadero School District is the notable exception, with just 32% of graduates attending college within 12 or 16 months.

Figure V-26. College-Going Rates, 2017-2018

Source:
California Department of Education and Root Policy Research.

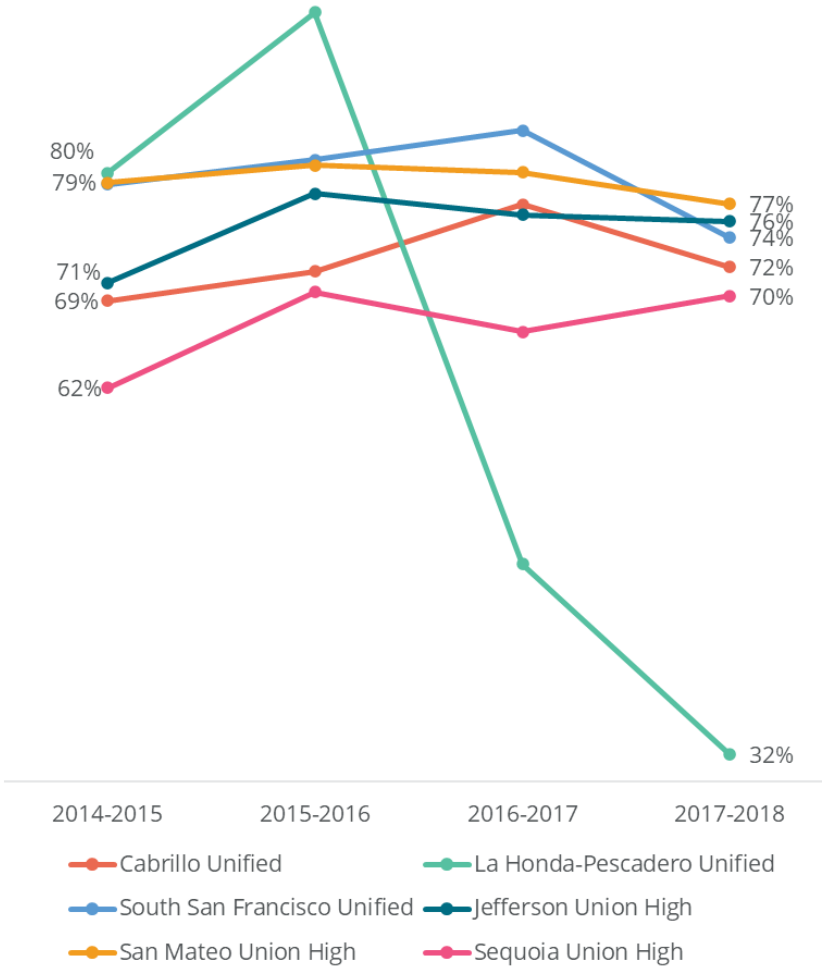


As shown in Figure V-27, La Honda-Pescadero School District previously had the highest college-going rate of all the county's high school districts, with an 80% college-going rate in 2014-2015 and a 93% college-going rate in 2015-2016. The district experienced a rapid decline in college-going rates, starting in 2016-2017. However, La Honda-Pescadero has especially small sample sizes. For instance, the district had just 26 twelfth-graders in the 2017-2018 school year, meaning that just a couple students going to college (or not) drastically alters the college-going rate in La Honda-Pescadero. All other high school districts in the county have maintained relatively consistent college-going rates.

Figure V-27. College-Going Rates, 2014-2015 to 2017-2018

Source:

California Department of Education and Root Policy Research.



Within each of the high school districts, college-going rates vary by race and ethnicity.

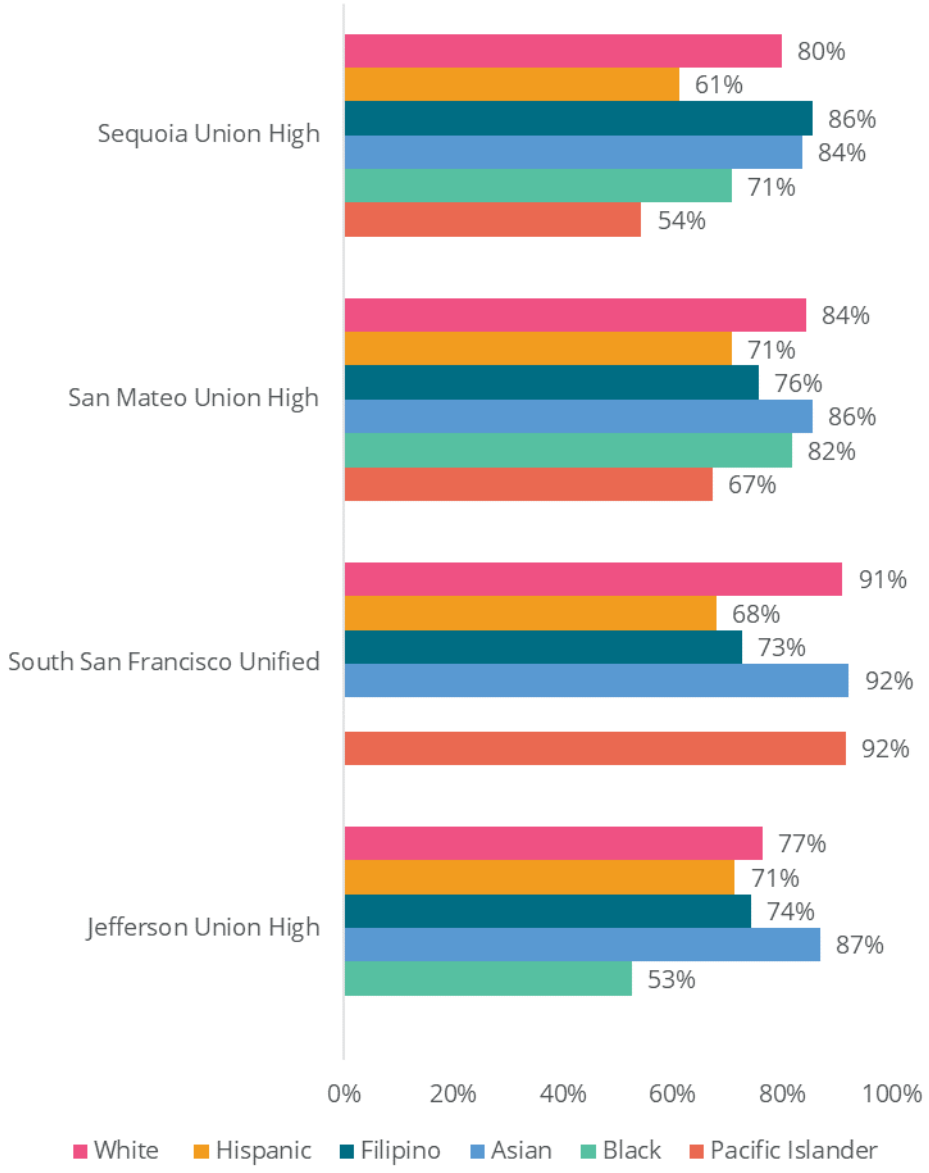
- In every district, White students have a higher college-going rate than Hispanic students, but the largest gaps are in South San Francisco United, where 91% of White students go to college compared to just 68% of Hispanic students, a 23 percentage point gap. Jefferson Union has the smallest gap between the two groups: 77% of White students go to college compared to 71% of Hispanic students.

- Among Black/African American students, those at San Mateo Union have the highest college-going rate at 82%. Those at Jefferson Union have the lowest at just 53%, which is 24 percentage points lower than that of White students and 34 percentage points lower than that of Asian students.

- Overall, Asian students have among the highest college-going-rates in the county. The rate is especially high in South San Francisco Unified, where 92% go to college. The rate is lowest in Sequoia Union High School District, where 84% go to college.

- Filipino students also have generally high rates of college-going. The highest college-going rate among Filipino students is in Sequoia Union (86%) and the lowest is in South San Francisco Unified (73%).
- College-going rates for Pacific Islander students vary substantially by district. For instance, in Sequoia Union 54% go to college, but in South San Francisco Unified 92% go to college.

Figure V-28.
College-going Rates by Race and Ethnicity, 2017-18



Note: Cabrillo Unified and La Honda- Pescadero Unified are not included here because they do not report the data, likely due to small sample sizes.

Source: California Department of Education and Root Policy Research

College-going rates are lower for students with disabilities and those learning English compared to the overall student population across the county.

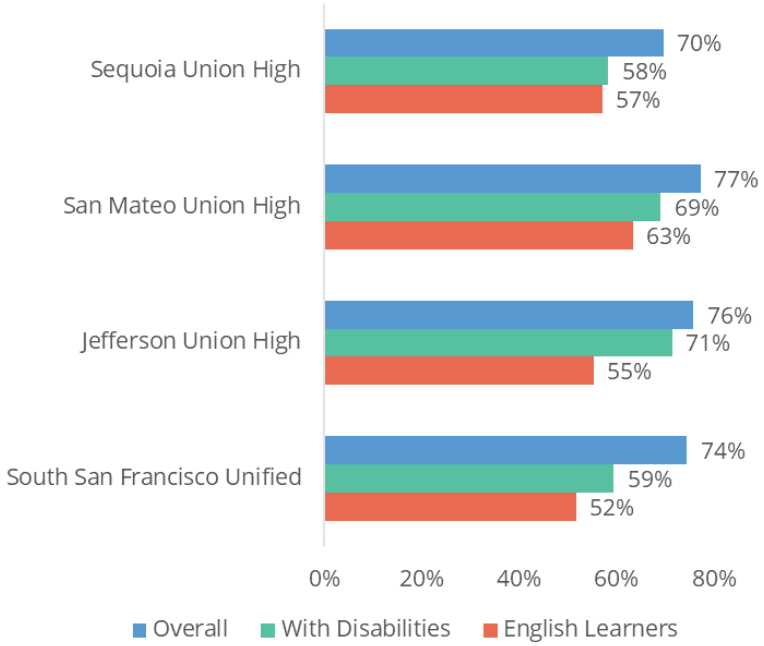
- For instance, the largest gap between overall college-going rates and English learners' college-going rates is in South San Francisco Unified, where just 52% of English learning students go to college as opposed to 74% of the overall student population—a 22 percentage point gap. Among English learners, San Mateo Union High School District had the highest college-going rate, where 63% of English learners go to college.

- Among students with disabilities, South San Francisco Unified also had the largest gap, where 59% of students with disabilities went to college compared to 74% of the overall student population — a 15 percentage point gap. Jefferson Union, on the other hand, had a relatively high college-going rate among students with disabilities that was not very different from the district's overall college-going rate: 71% went to college which is just five percentage points lower than the district's overall student population.

Figure V-29. College-going Rates for English Learners and Students with Disabilities, 2017-2018

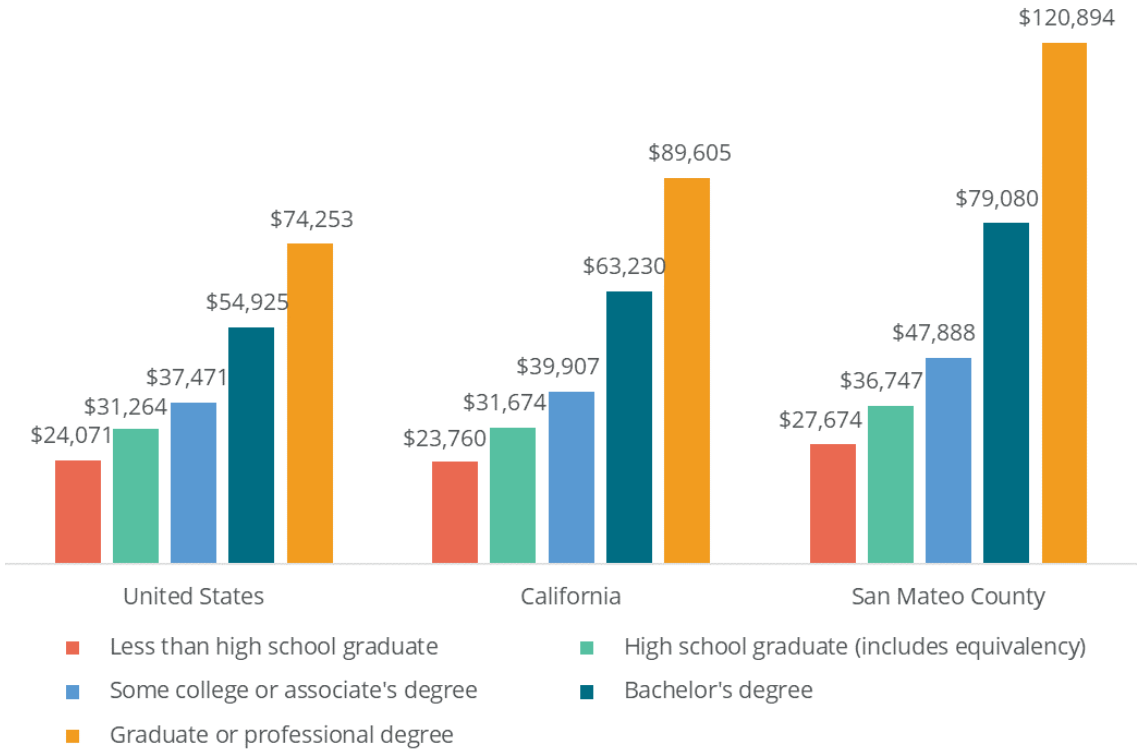
Note:
Cabrillo Unified and La Honda-Pescadero Unified are not included here because they do not report the data, likely due to small sample sizes.

Source:
California Department of Education and Root Policy Research.



Gaps in college enrollment by race, ethnicity, disability status, or English learning have stark financial consequences for students in the long-term. Figure V-30 illustrates median annual earnings by educational attainment. College degrees are especially important in San Mateo County: those with a bachelor's degree in the county earn 115% more than those with a high school diploma. This gap is wider in San Mateo County than in other parts of California and nationwide. The differences between high-school graduate earnings and bachelor's degree earnings are around 100% in California and 76% in the US overall.

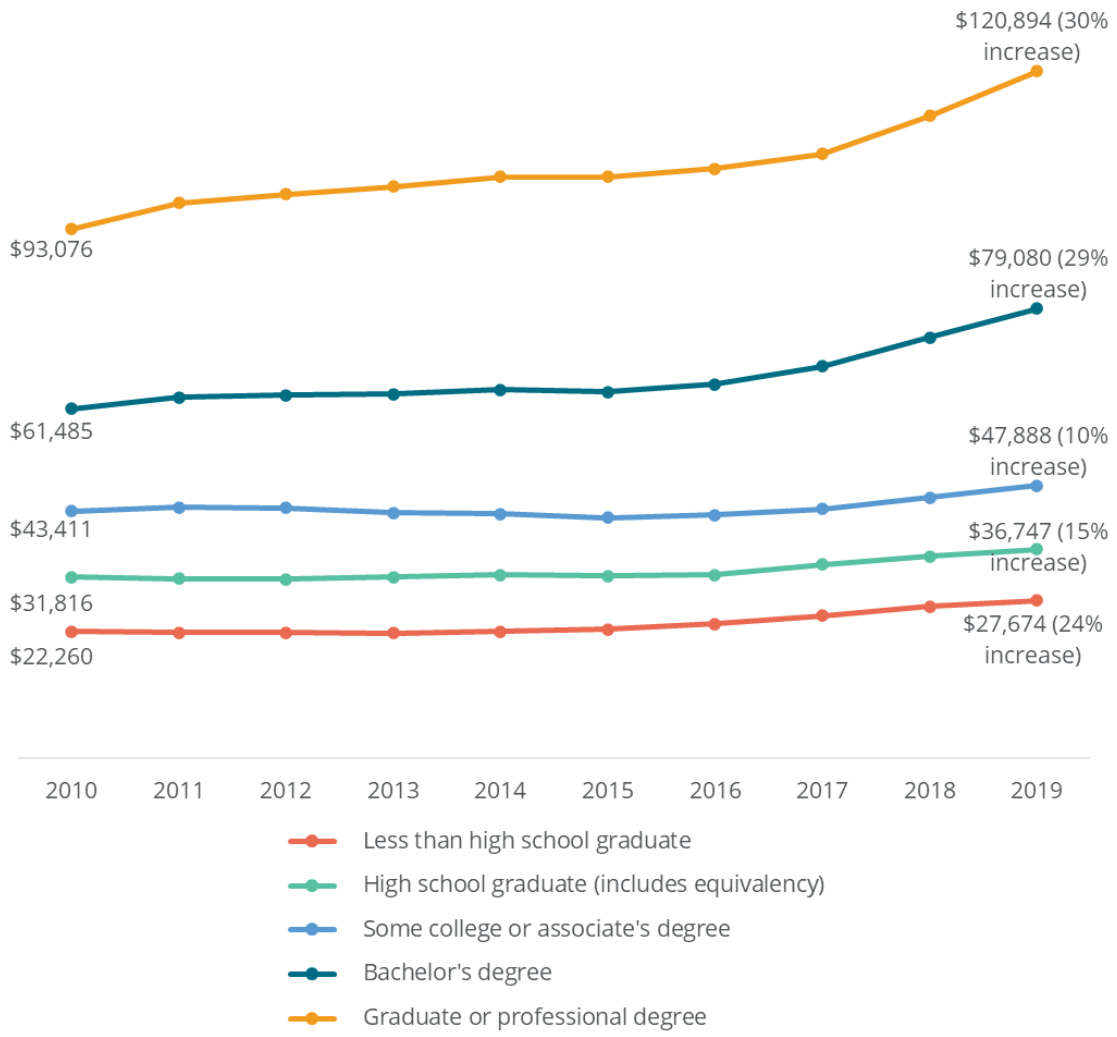
Figure V-30.
Median Annual Earnings by Educational Attainment, 2019



Source: 5-year 2019 American Community Surveys Data.

Unfortunately, the gap between high school graduates' and college graduates' earnings have been increasing in San Mateo County. As illustrated in Figure V-31, median earnings for high school graduates increased by just 15% over the last decade (from $31,816 to $36,747) while earnings for college graduates increased by 29% over the same period (from $61,485 to $79,080).

Figure V-31.
Median Annual Earnings by Educational Attainment in San Mateo County, 2010 to 2019



Source: 5-year American Community Surveys Data.

Because income disparities between college graduates and high school graduates have been increasing, it is increasingly important that school districts in San Mateo County address differences in college-going rates stratified by race, ethnicity, and extenuating circumstances.

Barriers to Success

Many students are unable to achieve academic success because of barriers in home and school. This section explores the available indicators of barriers to success, including chronic absenteeism and dropout rates. It also describes inequities in discipline rates by

race and ethnicity, which has been linked both to discrimination by education professionals as well as a major barrier to students' future success.

Chronic absenteeism. Academic studies have found that if a student is chronically absent, it reduces their math and reading achievement outcomes, educational engagement, and social engagement.[12] Chronic absenteeism also has spillover effects and negatively impacts students who themselves are not chronically absent. For instance, one study found that students suffer academically from having chronically absent classmates—as exhibited across both reading and math testing outcomes.[13]

Students are considered chronically absent if they were absent for 10% or more of the days during a school year. Note, however, students are exempt from chronic absenteeism calculations if they receive instruction through a home or hospital instructional setting, are attending community college full-time, or were not expected to attend more than 31 days.

In the county overall, 10% of students were chronically absent during the 2018-2019 school year.[14] This is a slight increase from the 2016-2017 school year, where just 9% of students overall were chronically absent.

Chronic absenteeism rates were higher in districts with a large number of students experiencing economic and housing precarity. For instance, Ravenswood Elementary, which has a 30% rate of homelessness among students, had one of the higher rates of chronic absenteeism at 16%. La Honda-Pescadero and Sequoia Union high school districts also had high rates of chronically absent students at 16% and 17%, respectively.

When disaggregating by race and ethnicity, just 3% of Asian students were chronically absent, and 7% of White and Filipino students were chronically absent. On the other end of the spectrum, Pacific Islander students (26%), Black/African American students (18%), and Hispanic students (15%) had notably higher rates of chronic absenteeism than the overall student population (10%). Chronic absenteeism among Pacific Islander students has increased in recent years, as illustrated in Figure V-32.

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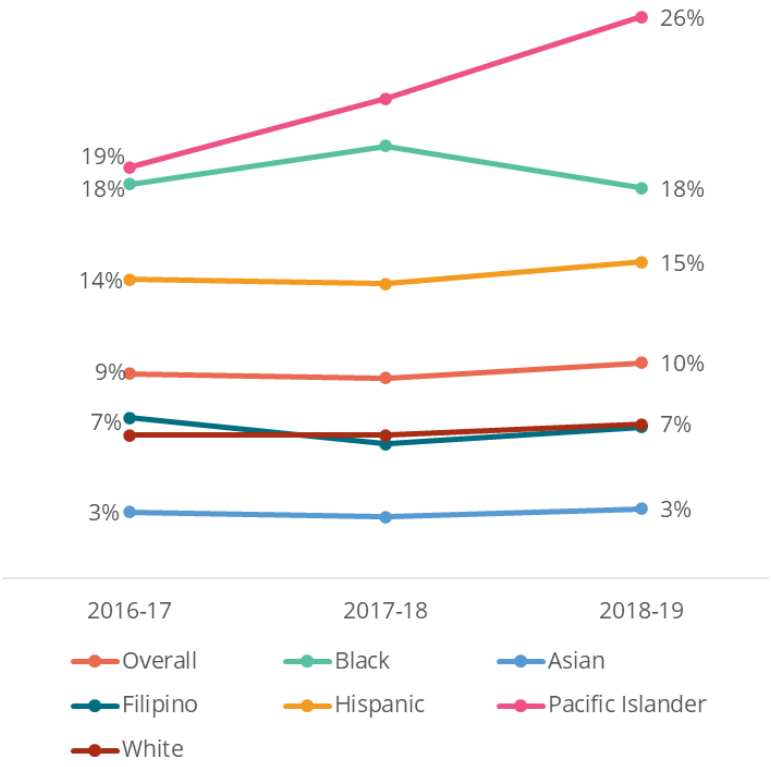
[12] Gottfried, Michael A. "Chronic absenteeism and its effects on students' academic and socioemotional outcomes." Journal of Education for Students Placed at Risk (JESPAR) 19.2 (2014): 53-75.

[13] Gottfried, Michael A. "Chronic absenteeism in the classroom context: Effects on achievement." Urban Education 54.1 (2019): 3-34.

[14] Because of the physical school closures during the COVID-19 pandemic, the California Department of Education determined that 2019–2020 absenteeism data are not valid, therefore, we present data from the 2018-2019 school year.

Figure V-32. Chronic Absenteeism by Race/Ethnicity, 2016-2017 to 2018-2019

Source: California Department of Education and Root Policy Research



Chronic absenteeism among Pacific Islander students was especially pronounced in San Mateo-Foster City school district where there was a 26 percentage point gap between chronic absenteeism rates for Pacific Islander students (32%) and the overall student body (6%). Other districts had similarly large gaps, including San Bruno Park Elementary (20 percentage points) and South San Francisco Unified (18 percentage points).

Some districts had larger gaps in absenteeism rates between Black/African American students and the overall population. For instance, in San Carlos Elementary, 4% of the overall student body is chronically absent compared to 27% of Black/African American students— a 23 percentage point gap. Jefferson Elementary school district had a 17 percentage point gap between their overall chronic absenteeism rate (12%) and their chronic absenteeism rate among Black/African American students (28%).

Among White students, Bayshore Elementary School District was a major outlier, where 46% of White students were chronically absent compared to just 12% of the total student population. However, it is important to note that this represents a very small sample of White students: just 3% of students at Bayshore Elementary are White, one of lowest in the county.

Figure V-33.
Chronic Absenteeism by District and Race/Ethnicity, 2018-2019

School District	Total	Asian	Black	Filipino	Hispanic	Pacific Islander	White
Unified School Districts							
Cabrillo Unified	10%	5%	(no data)	5%	11%	(no data)	10%
La Honda-Pescadero	16%	(no data)	(no data)	(no data)	14%	(no data)	18%
South San Francisco	13%	4%	16%	7%	17%	31%	12%
High & Elementary School Districts							
Jefferson Union High School	15%	8%	22%	11%	22%	18%	15%
Bayshore Elementary	12%	5%	12%	0%	18%	19%	46%
Brisbane Elementary	12%	3%	(no data)	12%	17%	(no data)	17%
Jefferson Elementary	12%	5%	28%	6%	13%	25%	23%
Pacifica	7%	4%	12%	6%	9%	21%	7%
San Mateo Union High School	10%	3%	18%	4%	17%	21%	9%
Burlingame Elementary	5%	2%	15%	5%	10%	20%	5%
Hillsborough Elementary	4%	1%	(no data)	4%	4%	(no data)	6%
Millbrae Elementary	10%	3%	6%	17%	16%	26%	14%
San Bruno Park Elementary	12%	5%	10%	4%	14%	32%	9%
San Mateo-Foster City	6%	2%	9%	2%	10%	32%	4%
Sequoia Union High School	17%	6%	23%	8%	23%	33%	10%
Belmont-Redwood Shores	5%	3%	8%	5%	12%	17%	5%
Las Lomitas Elementary	4%	2%	0%	(no data)	7%	(no data)	3%
Menlo Park City Elementary	3%	1%	8%	7%	5%	14%	3%
Portola Valley Elementary	4%	0%	(no data)	(no data)	6%	(no data)	3%
Ravenswood City Elementary	16%	0%	20%	(no data)	15%	24%	21%
Redwood City Elementary	10%	2%	19%	3%	12%	18%	4%
San Carlos Elementary	4%	2%	27%	8%	7%	(no data)	3%
Woodside Elementary	8%	0%	0%	(no data)	12%	(no data)	7%
Total	10%	3%	18%	7%	15%	26%	7%

Source: California Department of Education and Root Policy Research

In most districts, chronic absenteeism is higher among students with disabilities. In fact, only Bayshore Elementary's students with disabilities had a lower rate of chronic absenteeism than the overall student body. In all other districts, students with disabilities were more likely to be chronically absent than the overall student population. This was particularly true in Sequoia Union High School District, Jefferson Union High School District, and San Mateo Union High School District, which had gaps between the overall

absenteeism rate and the absenteeism rate among students with disabilities of 13, 12, and 11 percentage points, respectively.

Rates of chronic absenteeism were also higher among English learners than the general population in most districts (with the exception of Ravenswood City Elementary and Jefferson Elementary). Woodside Elementary and Sequoia Union High School districts both had 14 percentage point gaps between absenteeism rates of English learners and the overall student body.

In every school district where the data are available, foster youth had higher rates of chronic absenteeism than the overall population. This was especially true in Sequoia Union High School District, where 63% of foster youth were chronically absent compared to just 17% of the overall student body.

Similarly, in almost all districts with available data, students experiencing homelessness had higher rates of chronic absenteeism than the overall student body. The chronic absenteeism rate among students experiencing homelessness was highest in Burlingame Elementary at 64%.

Migrant students were chronically absent at rates similar to or lower than the total student body in all districts with reported data.

Figure V-34.
Chronic Absenteeism by District and Extenuating Circumstance, 2018-2019

School District	Total	English Learners	Experiencing homelessness	Migrant	Foster Youth	With Disabilities
Unified School Districts						
Cabrillo Unified	10%	12%	23%	9%	(no data)	18%
La Honda-Pescadero	16%	16%	(no data)	(no data)	(no data)	22%
South San Francisco	13%	14%	47%	13%	49%	18%
High & Elementary School Districts						
Jefferson Union High School	15%	27%	33%	(no data)	36%	28%
Bayshore Elementary	12%	19%	(no data)	(no data)	(no data)	11%
Brisbane Elementary	12%	18%	(no data)	(no data)	(no data)	18%
Jefferson Elementary	12%	10%	21%	(no data)	24%	16%
Pacifica	7%	11%	(no data)	(no data)	(no data)	14%
San Mateo Union High School	10%	21%	50%	(no data)	53%	21%
Burlingame Elementary	5%	8%	64%	(no data)	(no data)	12%
Hillsborough Elementary	4%	6%	(no data)	(no data)	(no data)	8%
Millbrae Elementary	10%	12%	5%	(no data)	(no data)	12%
San Bruno Park Elementary	12%	12%	(no data)	(no data)	18%	20%
San Mateo-Foster City	6%	8%	15%	(no data)	17%	13%
Sequoia Union High School	17%	31%	52%	16%	63%	29%
Belmont-Redwood Shores	5%	11%	(no data)	(no data)	(no data)	10%
Las Lomitas Elementary	4%	6%	(no data)	(no data)	(no data)	5%
Menlo Park City Elementary	3%	5%	(no data)	(no data)	(no data)	9%
Portola Valley Elementary	4%	3%	(no data)	(no data)	(no data)	9%
Ravenswood City Elementary	16%	16%	19%	17%	23%	21%
Redwood City Elementary	10%	12%	30%	6%	32%	16%
San Carlos Elementary	4%	8%	23%	(no data)	(no data)	11%
Woodside Elementary	8%	22%	(no data)	(no data)	(no data)	10%

Source: California Department of Education and Root Policy Research

Dropout rates. As previously indicated, workers without a high school degree have the lowest annual earnings compared to others at higher levels of educational attainment. In addition to the economic and housing precarity associated with low earnings, low earnings also often lead to increased incentives to participate in criminal activity. In fact, one study

suggest that high school dropouts are 3.5 times more likely than high school graduates to be imprisoned at some point during their lifetime.[15] Another study found that raising the high school completion rate by one percent for all men ages 20 through 60 would save the US $1.4 billion annually in crime related costs.[16] Dropping out of high school also has adverse health costs: for instance, research has shown that high school dropouts are more likely to smoke and have a marijuana disorder in adulthood.[17] For these reasons, reducing high school dropout rates in San Mateo County is pivotal to the health and economic prosperity of the community.

In this report, dropout rates shown for high school districts with available data and are defined as the percentage of cohort students who did not graduate with a regular high school diploma, did not complete high school, and are not still enrolled as a "fifth year senior".

In the 2019-2020 academic year, dropout rates were highest in Sequoia Union High School District, where 10% of students dropped out. This is similar to South San Francisco Unified, where 9% of students dropped out. In both these districts, and in Cabrillo Unified, dropout rates have increased since 2016-2017.

Dropout rates have decreased by one percentage point over the same period in San Mateo Union High School District, from 5% to 4%. Jefferson Union had the lowest dropout rate in the county at just 3%, which after slightly higher rates in 2017-18 and 2018-19, is the same as its 2016-2017 rate.

[15] Monrad, Maggie. "High School Dropout: A Quick Stats Fact Sheet." National High School Center (2007).

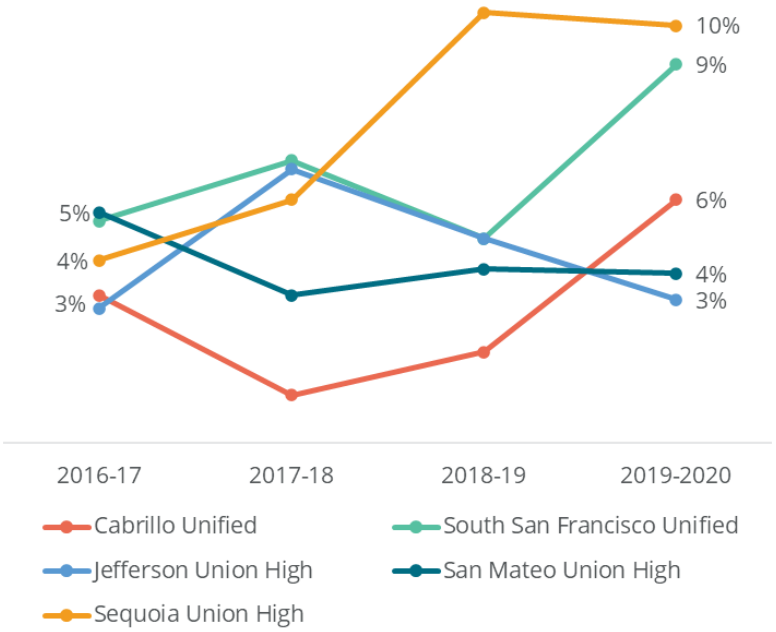
[16] U.S. Department of Justice, Bureau of Justice Statistics. (2002). Correctional populations in the United States, 1998 (NCJ-192929). Washington: U.S. Government Printing Office.

[17] Gonzalez, Jennifer M. Reingle, et al. "The long-term effects of school dropout and GED attainment on substance use disorders." Drug and alcohol dependence 158 (2016): 60-66.

Figure V-35. Dropout Rates by District, 2016-2017 to 2019-2020

Note: La Honda-Pescadero Unified School District is excluded from these data.

Source: California Department of Education and Root Policy Research

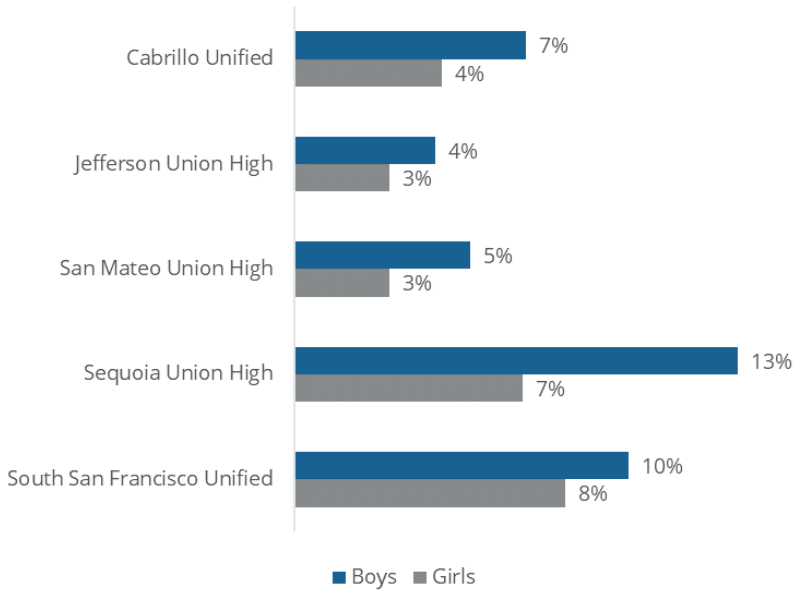


In all school districts in the county, dropout rates are higher for boys than for girls. Jefferson Union had the smallest gender gap, where 3% of girls dropped out and 4% of boys dropped out. Sequoia Union had the widest gender gap, where 13% of boys dropped out compared to just 7% of girls.

Figure V-36. Dropout Rates by Gender, 2019-2020

Note: La Honda-Pescadero Unified School District is excluded from these data.

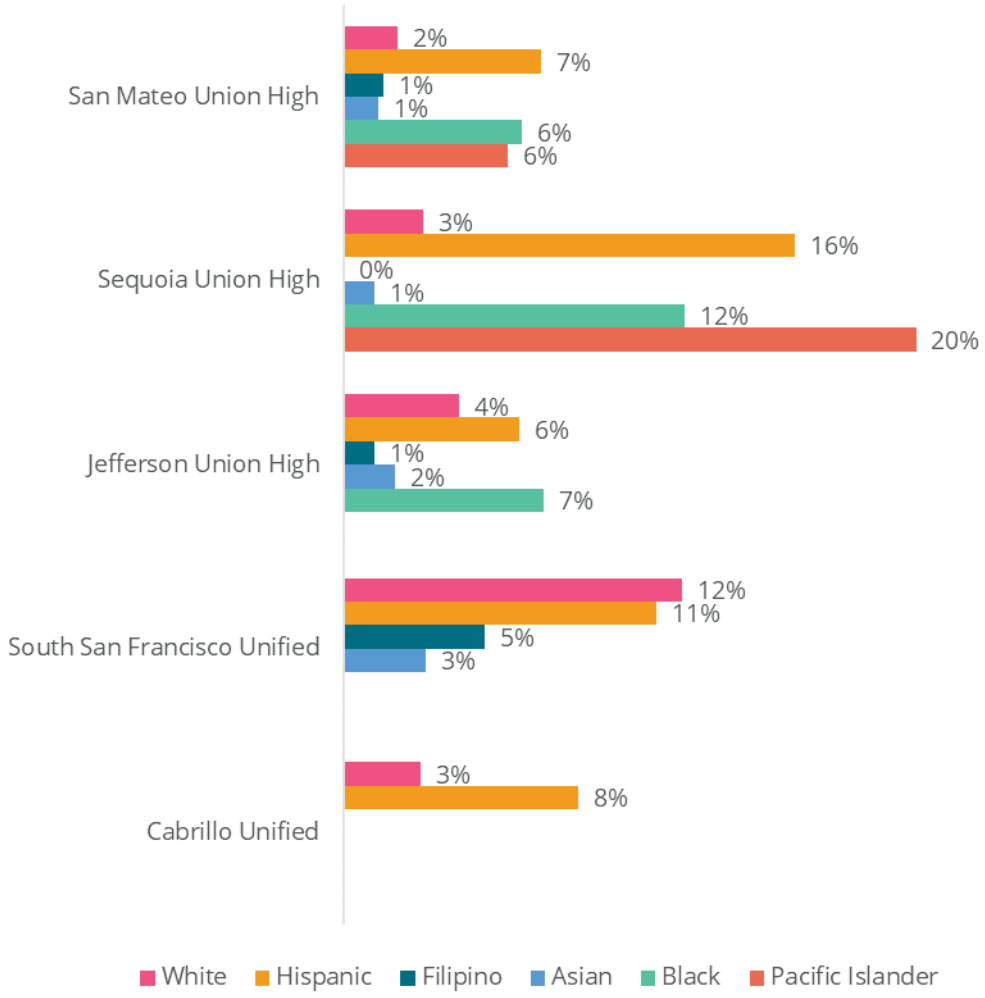
Source: California Department of Education and Root Policy Research



Pacific Islander, Black/African American, and Hispanic students in the county often had higher dropout rates than those in other racial and ethnic groups.

- In Sequoia Union High School District, dropout rates were highest among Pacific Islander students, where 20% dropped out in the 2019-2020 academic year. Dropout rates were also especially high among Hispanic and Black/African American students in Sequoia Union, at 16% and 12% respectively.
- In districts with lower dropout rates, for instance, Jefferson Union, the highest dropout rates still found among Black/African American (7%) and Hispanic students (6%).
- Notably, however, in South San Francisco Unified, White students were more likely to drop out than any other racial or ethnic group. In fact, 12% of White students dropped out compared to 11% of Hispanic students, 5% of Filipino students, and 3% of Asian students. Data for Black/African American and Pacific Islander students were not available for South San Francisco Unified due to small sample sizes.

Figure V-37.
Dropout Rates by Race, 2019-2020

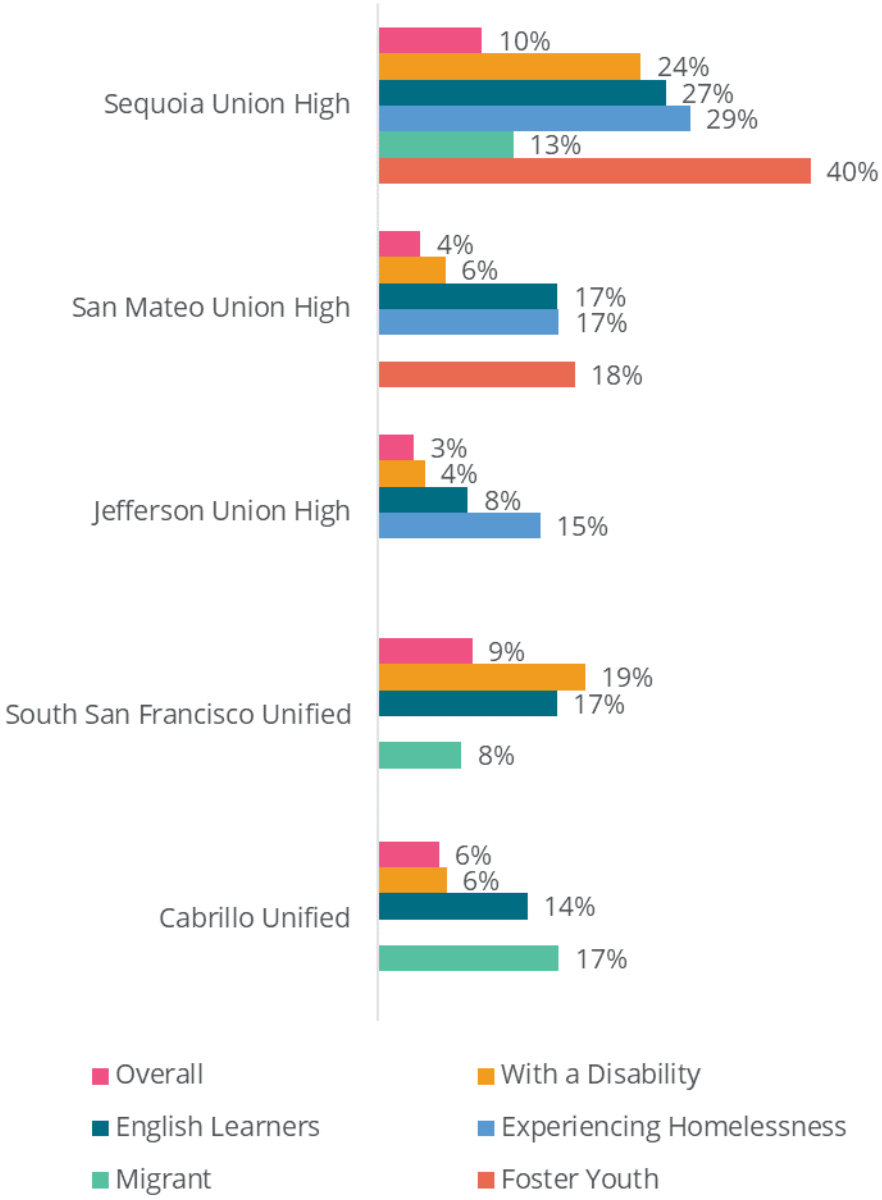


Source: California Department of Education and Root Policy Research

In all school districts in the county, students with disabilities, students experiencing homelessness, foster youth, and students learning English had higher dropout rates than the overall population.

- Among students with disabilities, the highest dropout rate was in Sequoia Union, where 24% dropped out. The gap between overall dropout rates and dropout rates among students with disabilities was wide in Sequoia Union at 14 percentage points.
- Cabrillo Unified, on the other hand, had less than a one percentage point gap between the dropout rate of overall students (6%) and students with disabilities (6%).
- Among students learning English, Sequoia Union had the highest dropout rate at 27%, while Jefferson Union had the lowest dropout rate at 8%.
- Sequoia Union also had the highest rate of dropout among students experiencing homelessness at 29% while Jefferson Union, again, had the lowest at 15%.
- Foster Youth in Sequoia Union had an exceptionally high dropout rate a t 40%. San Mateo Union is the only other district in the county which reported these data in 2019-2020, and found only 18% of foster youth dropped out.
- Migrant students at South San Francisco Unified actually dropped out at a rate slightly lower than the general student body: just 8% of migrant students dropped out compared to 9% of the overall student body. However, those in Cabrillo Unified were 11 percentage points more likely than the total student body to dropout.

Figure V-38.
Dropout Rates by Extenuating Circumstance, 2019-2020



Source: California Department of Education and Root Policy Research

Disproportionate discipline rates. Strict discipline policies may stigmatize suspended students and expose them to the criminal justice system at a young age, setting them up for limited economic and social success down the line. Research has found that suspensions not only negatively affect the suspended students, but also their peers.

Students in schools with higher suspension rates are more likely to drop out or school and less likely to attend a four-year college.[18]

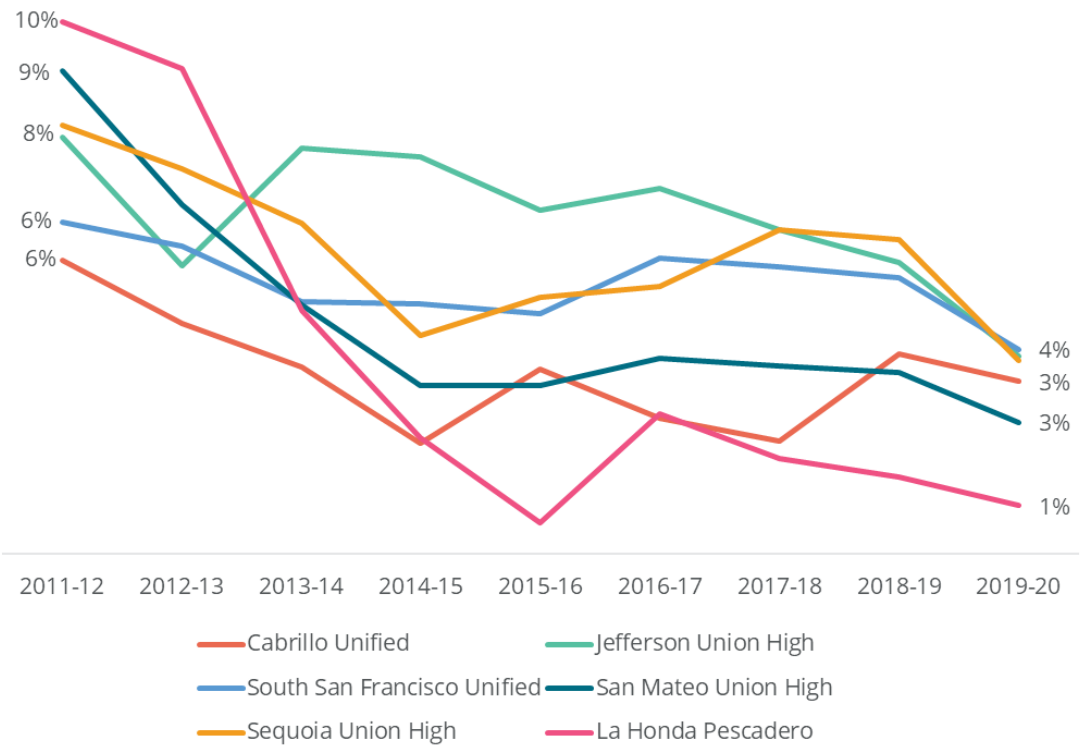
Other academic studies have found that students from African American and Latino families are more likely than their White peers to receive expulsion or out of school suspension as consequences for the same or similar problem behavior.[19] This means that Black/African American and Hispanic students suffer more of the economic and social consequences than their White peers for the same behaviors.

Luckily, in every high school district in San Mateo County, suspension rates have decreased since 2011-2012. La Honda-Pescadero School District experienced the largest decrease: it was the district with the highest suspension rate in 2011-2012 at 10%, but now has the lowest suspension rate at just 1% in 2019-2020. San Mateo Union also experienced a rapid decrease in suspension rates over the same period, with a rate of 9% in 2011-2012 to a rate of 3% in 2019-2020.

[18] Bacher-Hicks, Andrew, Stephen B. Billings, and David J. Deming. The school to prison pipeline: Long-run impacts of school suspensions on adult crime. No. w26257. National Bureau of Economic Research, 2019.

[19] Skiba, Russell J., et al. "Race is not neutral: A national investigation of African American and Latino disproportionality in school discipline." School Psychology Review 40.1 (2011): 85-107.

Figure V-39.
Suspension Rates, 2011-2012 to 2019-2020



Source: California Department of Education and Root Policy Research

In many school districts across San Mateo County, Hispanic students are disciplined at disproportionately higher rates compared to their peers. Figure V-40 compares each racial/ethnic group's share of suspensions to their share of the overall student population.

- In all districts except for La Honda-Pescadero, Hispanic students make up a larger share of suspensions than their overall share of the student body. For instance, in San Mateo Union, 34% of students are Hispanic, but 66% of suspended students are Hispanic, making a 32 percentage point overrepresentation gap.

- In most districts, Black and Pacific Islander students are also overrepresented in terms of suspension rates, but these rates are slight compared to those of Hispanic students. For instance, in Sequoia Union, just 2% of the student body identified as Pacific Islander but 8% of suspended students were Pacific Islander.

- Asian and Filipino students were *underrepresented* in terms of suspension rates. For example, in Jefferson Union High School District, 31% of students identified as Filipino but just 10% of suspended students were Filipino, a 21 percentage point gap. In San

Mateo Union High School, 22% of students identified as Asian but just 5% of suspended students were Asian, a 17 percentage point gap.

- White students were also underrepresented in discipline rates in most districts except for La Honda-Pescadero, where they were overrepresented by 30 percentage points. They were substantially underrepresented in Cabrillo Unified (with a gap of 21 percentage points) and Sequoia Union (18 percentage points).

Figure V-40.
Suspension Rates by Race and Ethnicity, 2019-2020

School District	Cabrillo Unified	Jefferson Union High	La Honda-Pescadero	San Mateo Union High	Sequoia Union High	South San Francisco Unified
Asian Students						
Share of Student Body	1%	14%		22%	9%	13%
Share of Suspensions	1%	7%		5%	1%	3%
Gap	0%	-7%		-17%	-8%	-10%
Black Students						
Share of Student Body		1%		1%	3%	1%
Share of Suspensions		5%		1%	6%	2%
Gap		4%		0%	3%	1%
Filipino Students						
Share of Student Body	1%	31%		6%	2%	23%
Share of Suspensions	0%	10%		2%	0%	9%
Gap	-1%	-21%		-4%	-2%	-14%
Hispanic Students						
Share of Student Body	52%	32%	61%	34%	41%	48%
Share of Suspensions	79%	46%	33%	66%	62%	69%
Gap	27%	14%	-28%	32%	21%	21%
Pacific Islander Students						
Share of Student Body		1%		2%	2%	2%
Share of Suspensions		4%		4%	8%	3%
Gap		3%		2%	6%	1%
White Students						
Share of Student Body	40%	14%	37%	26%	38%	7%
Share of Suspensions	19%	16%	67%	14%	20%	7%
Gap	-21%	2%	30%	-12%	-18%	0%

Notes: the percentage of suspensions and shares of racial groups do not sum to 100% because we exclude students with no reported race, with more than one reported race, where districts did not report racial/ethnic data due to small sample sizes. Gaps of 15 percentage points or more are highlighted.

Source: California Department of Education and Root Policy Research

Staff demographics. Diversity of school staff has been shown to improve outcomes for students of color. For instance, one recent study found that students are less likely to be removed from school as punishment when they and their teachers are the same race. This effect is driven almost entirely by black students, especially black boys, who are markedly less likely to be subjected to exclusionary discipline when taught by black teachers. There is little evidence of any benefit for white students of being matched with white teachers.[20] Other research in California has found that, when students have a teacher of their race, they are more likely to attend class, therefore reducing chronic absenteeism.[21] Even more studies have found that having a teacher of a student's own race substantially improves their math and reading achievement.[22]

In San Mateo County, the demographics of faculty and staff are fairly similar to that of its students. Figure V-41 illustrates the share of the county's faculty and staff who are Asian, Black/African American, Hispanic, Filipino, Pacific Islander, and White, and compares those shares to the racial/ethnic breakdown of the county's student body.

There is a slightly larger share of White and Black/African American staff than students, meaning that Black/African American and White student groups are more likely to interact with same-race staff and faculty than other racial groups. Asian students are less likely to interact with a same-race staff of faculty member: 17% of the student body is Asian compared to just 8% of staff and faculty.

[20] Lindsay, Constance A., and Cassandra MD Hart. "Teacher race and school discipline: Are students suspended less often when they have a teacher of the same race?." Education Next 17.1 (2017): 72-79.

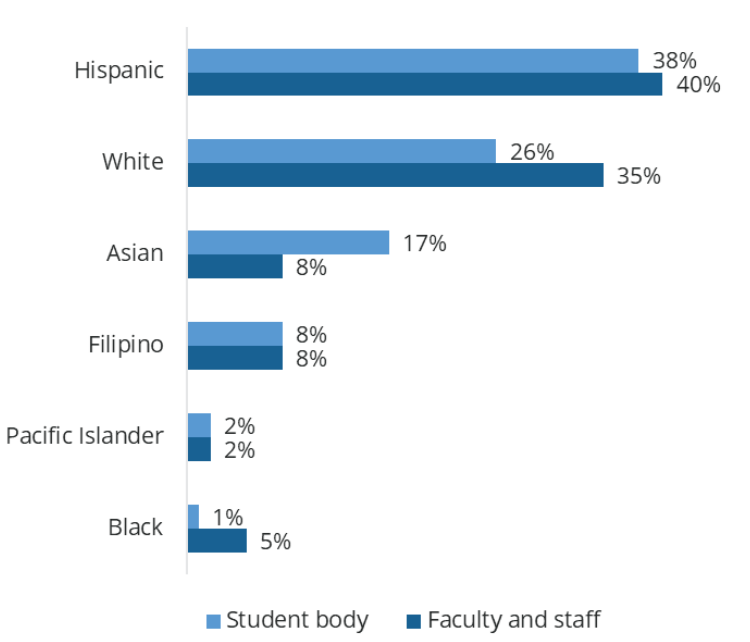
[21] Gottfried, Michael, J. Jacob Kirksey, and Tina L. Fletcher. "Do High School Students With a Same-Race Teacher Attend Class More Often?." Educational Evaluation and Policy Analysis (2021): 01623737211032241.

[22] Dee, T. S. (2004). Teachers, race, and student achievement in a randomized experiment. Review of economics and statistics, 86(1), 195-210.

Figure V-41. Staff and Student Demographics, 2020-2021

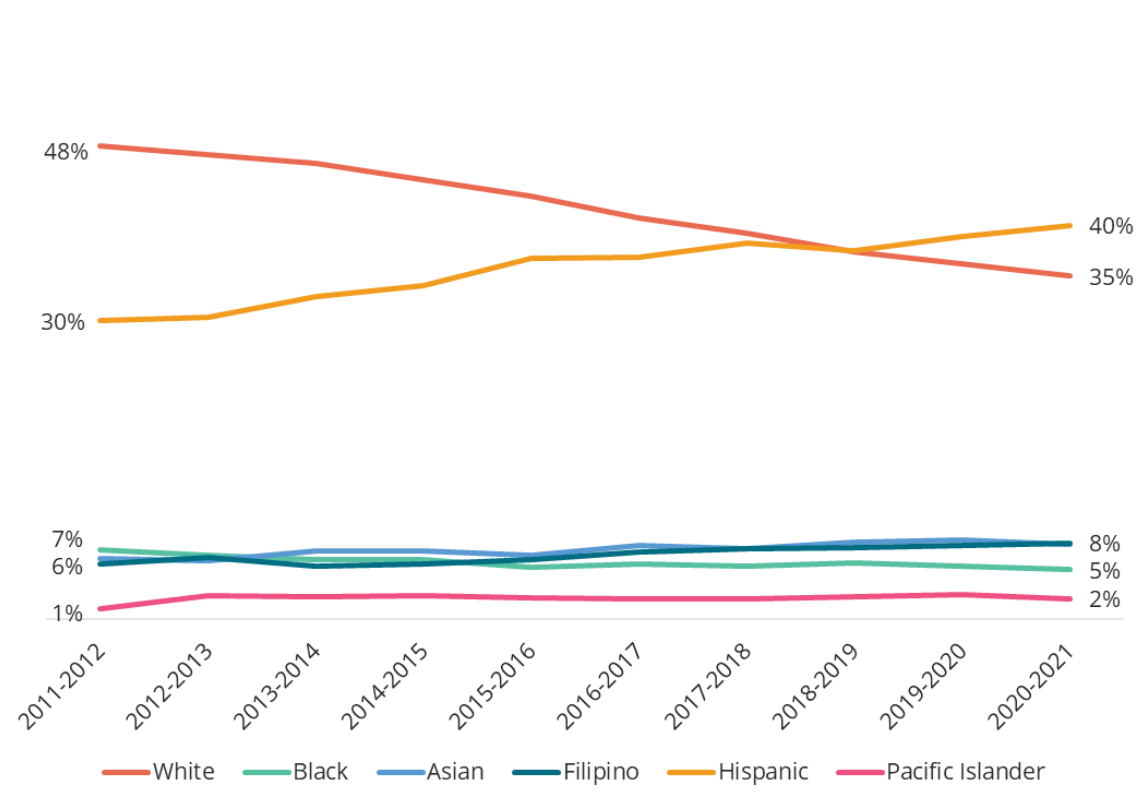
Notes: Percentages do not always sum to 100% because we do not show shares of staff with no reported race, with more than one reported race, or Native American staff.

Source: California Department of Education and Root Policy Research



Since 2011-2012, the county's school districts have diversified in that there has been a 13 percentage point decrease in the share of White faculty and staff and a 10 percentage point increase in Hispanic faculty and staff. However, there has been a slight decrease (by two percentage points) in the share of faculty and staff who identify as Black/African American. There has been a two percentage point increase in the share of Asian and Filipino faculty and staff, and a one percent increase in the share of Pacific Islander faculty and staff.

Figure V-42.
Faculty and Staff Demographics, 2011-2012 to 2020-2021



Notes: Percentages do not always sum to 100% because we do not show shares of staff with no reported race, with more than one reported race, or Native American staff.

Source: California Department of Education and Root Policy Research

Figure V-43 illustrates faculty and staff racial and ethnic diversity for the 2020-2021 school year by district.

- Portola Valley has the least diverse faculty and staff in the county, with 59% identifying as White.
- Ravenswood Elementary has the most diverse faculty and staff: the district has the highest share of Pacific Islander (5%), Black/African American (12%) and Hispanic (72%) faculty and staff.
- South San Francisco Unified School District has the highest share of Asian faculty and staff at 14%.
- Brisbane Elementary and Jefferson Elementary have the highest shares of Filipino faculty and staff at 28%.

Figure V-43.
Faculty and Staff Race/Ethnicity, by District, 2020-2021

School District	Asian	Black	Filipino	Hispanic	Pacific Islander	White
Unified School Districts						
Cabrillo Unified	0%	1%	1%	46%	0%	51%
La Honda-Pescadero	0%	5%	5%	39%	0%	51%
South San Francisco	14%	3%	16%	34%	2%	28%
High & Elementary School Districts						
Jefferson Union High School	3%	3%	13%	26%	1%	43%
Bayshore Elementary	13%	4%	17%	61%	0%	4%
Brisbane Elementary	7%	0%	28%	20%	4%	42%
Jefferson Elementary	13%	3%	28%	25%	0%	29%
Pacifica	7%	2%	8%	23%	2%	54%
San Mateo Union High School	11%	5%	6%	34%	3%	40%
Burlingame Elementary	8%	5%	11%	27%	3%	45%
Hillsborough Elementary	2%	1%	7%	20%	1%	55%
Millbrae Elementary	13%	3%	9%	25%	0%	48%
San Bruno Park Elementary	4%	2%	13%	26%	4%	48%
San Mateo-Foster City	13%	2%	7%	33%	3%	37%
Sequoia Union High School	2%	12%	2%	54%	4%	26%
Belmont-Redwood Shores	13%	2%	3%	39%	0%	42%
Las Lomitas Elementary	7%	7%	0%	42%	0%	42%
Menlo Park City Elementary	3%	1%	3%	28%	1%	40%
Portola Valley Elementary	4%	4%	0%	33%	0%	59%
Ravenswood City Elementary	2%	12%	1%	72%	5%	3%
Redwood City Elementary	4%	5%	2%	65%	1%	21%
San Carlos Elementary	8%	6%	3%	37%	1%	42%
Woodside Elementary	12%	8%	0%	30%	0%	49%
Total	8%	5%	8%	40%	2%	35%

Notes: Percentages do not always sum to 100% because we do not show shares of staff with no reported race, with more than one reported race, or Native American staff.

Source: California Department of Education and Root Policy Research

Figure V-44 illustrates the gap between faculty/staff representation and the student body. For instance, at San Bruno Park Elementary, 15% of the students are White while 48% of the faculty/staff are White, leaving a 33 percentage point gap.

If schools are striving for a distribution of faculty/staff that reflects the racial and ethnic distribution of their student body, the closer to a 0 percentage point gap, the better. Schools like San Bruno Park Elementary fall short of meeting this goal, in that there is a large overrepresentation of White faculty/staff compared to the student body. Many other districts have a large overrepresentation of White faculty/staff, including Millbrae Elementary (32 percentage point gap), Jefferson Union High School District (29 percentage point gap), and South San Francisco Unified School District (22 percentage points). There are just a few school districts where the share of White students is higher than the share of White faculty, particularly Woodside Elementary and Menlo Park City Elementary, both with a 15 percentage point gap.

Across most school districts, the share of Asian students is larger than the share of Asian faculty/staff. This suggests that Asian students are less likely than their peers to interact with a same-race teacher or staff member. The largest disparity is in Millbrae Elementary, where just 13% of the faculty identify as Asian compared to 46% of the student body, a 33 percentage point gap.

In many school districts, there is a dearth of Hispanic faculty and staff. For instance, in La Honda-Pescadero, 63% of students are Hispanic compared to 39% of faculty, a 24 percentage point gap. In other districts, however, there is a larger share of Hispanic faculty/staff than students. In Las Lomitas Elementary, for instance, 13% of students are Hispanic and 42% of faculty/staff are Hispanic. Recall that Las Lomitas Elementary commonly has high-performing English language learnings students. This may be partly due to the district's large portion of Hispanic faculty/staff.

Though district wide there are approximately the same portions of Filipino students as there are faculty/staff, Jefferson Union High School stands out as a district where Filipino students are less likely to interact with a same-race teacher or staff member. In Jefferson Union, 29% of students are Filipino compared to just 13% of faculty/staff.

In all districts, there only very small gaps in the share of students that identify as Pacific Islander and the share of faculty/staff that identify as Pacific Islander. All in all, they are represented in approximately equal proportions.

Figure V-44.
Difference Between Staff and Student Populations, by District, 2020-2021

School District	Asian	Black	Filipino	Hispanic	Pacific Islander	White
Unified School Districts						
Cabrillo Unified	-1%	1%	0%	-6%	0%	11%
La Honda-Pescadero	0%	5%	4%	-24%	0%	16%
South San Francisco	0%	2%	-7%	-14%	0%	22%
High & Elementary School Districts						
Jefferson Union High School	-12%	2%	-16%	-5%	0%	29%
Bayshore Elementary	-6%	1%	-4%	20%	-4%	1%
Brisbane Elementary	-13%	-1%	16%	-8%	4%	18%
Jefferson Elementary	-6%	1%	3%	-11%	-1%	18%
Pacifica	-1%	1%	-1%	-3%	2%	15%
San Mateo Union High School	-12%	4%	1%	2%	1%	12%
Burlingame Elementary	-19%	5%	8%	11%	3%	4%
Hillsborough Elementary	-30%	1%	5%	15%	1%	7%
Millbrae Elementary	-33%	2%	3%	5%	-2%	32%
San Bruno Park Elementary	-12%	1%	3%	-15%	-1%	33%
San Mateo-Foster City	-13%	1%	4%	-4%	1%	16%
Sequoia Union High School	-7%	10%	1%	9%	2%	-9%
Belmont-Redwood Shores	-19%	1%	0%	27%	-1%	8%
Las Lomitas Elementary	-11%	6%	-1%	29%	0%	-11%
Menlo Park City Elementary	-10%	0%	2%	11%	0%	-15%
Portola Valley Elementary	-2%	4%	0%	19%	0%	-7%
Ravenswood City Elementary	2%	7%	1%	-12%	-2%	2%
Redwood City Elementary	0%	4%	1%	-5%	0%	2%
San Carlos Elementary	-10%	5%	2%	23%	1%	-7%
Woodside Elementary	8%	6%	0%	14%	-1%	-15%
Total	-9%	4%	0%	2%	0%	9%

Notes: The figure shows percentage point gaps in student representation versus faculty/staff representation (calculated as the share of faculty/staff minus the share of students).

Source: California Department of Education and Root Policy Research

Please Start Here, Instructions in Cell A2, Table in A3:B17	Form Fields
Site Inventory Forms must be submitted to HCD for a housing element or amendment adopted on or after January 1, 2021. The following form is to be used for satisfying this requirement. To submit the form, complete the Excel spreadsheet and submit to HCD at sitesinventory@hcd.ca.gov. Please send the Excel workbook, not a scanned or PDF copy of the tables.	
General Information	
Jurisidiction Name	Millbrae
Housing Element Cycle	6th
Contact Information	
First Name	Roscoe
Last Name	Mata
Title	Planning Manager
Email	rmata@ci.millbrae.ca.us
Phone	6502592416
Mailing Address	
Street Address	621 Magnolia Avenue
City	Millbrae
Zip Code	94030
Website	
	https://www.ci.millbrae.ca.us/

Table A: Housing Element Sites Inventory, Table Starts in Cell A2 For San Mateo County jurisdictions, please format the APNs as follows: 999-999-999

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Minimum Density Allowed (units/acre	Maximum Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Optional Information1	Optional Information2	Optional Information3
Millbrae	1395 El Camino Real	94030	021-278-010		DECRSP Area	DECRSP, Downtown and El Camino Real Specific Plan	60	80	0.6	Commercial	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	45	0	45	One-story Retail, DECRSP Favorable Site, Built in 1959	Downtown and El Camino Real Specific Plan	Current GP and Zoning Designation reflect General Plan 2040 and new DECRSP, per HCD direction.
Millbrae	1301 Broadway	94030	021-276-330		General Commercial	CMU, Commercial Mixed Use	0	8.71	0.6718	Commercial	YES - Current	NO - Privately-Owned	Pending Project	Not Used in Prior Housing Element	49	0	50	99	One-story Office, 70% Vacant, Built in 1959		Current GP and Zoning Designation reflect General Plan 2040, per HCD direction.
Millbrae	1201 El Camino Real	94030	021-291-020		DECRSP Area	DECRSP, Downtown and El Camino Real Specific Plan	60	80	0.5376	Commercial	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	40	0	40	Automotive Uses, DECRSP Favorable Site	Downtown and El Camino Real Specific Plan	Current GP and Zoning Designation reflect General Plan 2040 and new DECRSP, per HCD direction.
Millbrae	1125 El Camino Real	94030	021-292-070	A	DECRSP Area	DECRSP, Downtown and El Camino Real Specific Plan	60	80	1.118	Commercial	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	Retail, DECRSP Favorable Site	Downtown and El Camino Real Specific Plan	Current GP and Zoning Designation reflect General Plan 2040 and new DECRSP, per HCD direction.
Millbrae	1121 El Camino Real	94030	021-292-030	A	DECRSP Area	DECRSP, Downtown and El Camino Real Specific Plan	60	80	0.55	Commercial	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	84	0	84	Automotive Uses, DECRSP Favorable Site	Downtown and El Camino Real Specific Plan	Current GP and Zoning Designation reflect General Plan 2040 and new DECRSP, per HCD direction.
Millbrae	1150 El Camino Real	94030	021-324-310		DECRSP Area	DECRSP, Downtown and El Camino Real Specific Plan	70	130	5.5	Parking	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	61	0	0	61	Parking Lot, DECRSP Favorable Site	Downtown and El Camino Real Specific Plan	Current GP and Zoning Designation reflect General Plan 2040 and new DECRSP, per HCD direction.
Millbrae	1100 El Camino Real	94030	021-324-320	B	DECRSP Area	DECRSP, Downtown and El Camino Real Specific Plan	70	130	1.1133	Hotel/motel	YES - Current	NO - Privately-Owned	Pending Project	Not Used in Prior Housing Element	19	0	357	376	Hotel, Demolition Permit Approved, Built in 1949	Downtown and El Camino Real Specific Plan	Current GP and Zoning Designation reflect General Plan 2040 and new DECRSP, per HCD direction.
Millbrae	979 Broadway	94030	021-362-310		DECRSP Area	DECRSP, Downtown and El Camino Real Specific Plan	60	80	1.81	Commercial	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	11	73	0	84	Retail, DECRSP Favorable Site, Second story vacancy, Built in 1968	Downtown and El Camino Real Specific Plan	Current GP and Zoning Designation reflect General Plan 2040 and new DECRSP, per HCD direction.
Millbrae	959 El Camino Real	94030	021-364-080		DECRSP Area	DECRSP, Downtown and El Camino Real Specific Plan	70	130	3.107	Vacant	YES - Current	NO - Privately-Owned	Pending Project	Not Used in Prior Housing Element	26	0	252	278	Vacant Retail, Approved for Development	Downtown and El Camino Real Specific Plan	Current GP and Zoning Designation reflect General Plan 2040 and new DECRSP, per HCD direction.
Millbrae	West of Magnolia Ave and Library Ave	94030	021-420-220		DECRSP Area	DECRSP, Downtown and El Camino Real Specific Plan	60	80	5.626	Parking	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	88	60	88	236	Parking Lot, DECRSP Favorable Site, Property Owner interested in Developing	Downtown and El Camino Real Specific Plan	Current GP and Zoning Designation reflect General Plan 2040 and new DECRSP, per HCD direction.
Millbrae	537 Broadway	94030	021-420-110		DECRSP Area	DECRSP, Downtown and El Camino Real Specific Plan	70	130	2.204	Commercial	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	175	0	449	624	Retail, DECRSP Favorable Site, Built in 1964	Downtown and El Camino Real Specific Plan	Current GP and Zoning Designation reflect General Plan 2040 and new DECRSP, per HCD direction.
Millbrae	North of Silva Ave and between El Camino Real and Broadway	94030	021-420-130		DECRSP Area	DECRSP, Downtown and El Camino Real Specific Plan	70	130	0.13	Parking	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	120	0	124	244	Parking Lot, DECRSP Favorable Site, Property Owner interested in Developing	Downtown and El Camino Real Specific Plan	Current GP and Zoning Designation reflect General Plan 2040 and new DECRSP, per HCD direction.
Millbrae	480 El Camino Real	94030	021-314-100		DECRSP Area	DECRSP, Downtown and El Camino Real Specific Plan	70	130	0.88	Parking	YES - Current	NO - Privately-Owned	Pending Project	Not Used in Prior Housing Element	0	0	9	9	Parking Lot, Approved for Development	Downtown and El Camino Real Specific Plan	Current GP and Zoning Designation reflect General Plan 2040 and new DECRSP, per HCD direction.
Millbrae	460 El Camino Real	94030	024-123-200	C	DECRSP Area	DECRSP, Downtown and El Camino Real Specific Plan	70	130	0.8371	Commercial	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	Retail, DECRSP Favorable Site	Downtown and El Camino Real Specific Plan	Current GP and Zoning Designation reflect General Plan 2040 and new DECRSP, per HCD direction.
Millbrae	450 El Camino Real	94030	024-123-190	C	DECRSP Area	DECRSP, Downtown and El Camino Real Specific Plan	70	130	0.1152	Commercial	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	97	0	0	97	Retail, DECRSP Favorable Site	Downtown and El Camino Real Specific Plan	Current GP and Zoning Designation reflect General Plan 2040 and new DECRSP, per HCD direction.
Millbrae	400 El Camino Real	94030	024-123-130	D	DECRSP Area	DECRSP, Downtown and El Camino Real Specific Plan	70	130	0.05	Parking	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	92	0	0	92	Parking Lot, DECRSP Favorable Site	Downtown and El Camino Real Specific Plan	Current GP and Zoning Designation reflect General Plan 2040 and new DECRSP, per HCD direction.
Millbrae	420 El Camino Real	94030	024-123-140	D	DECRSP Area	DECRSP, Downtown and El Camino Real Specific Plan	70	130	3.6	Commercial	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	Restaurant, Built in 1973	Downtown and El Camino Real Specific Plan	Current GP and Zoning Designation reflect General Plan 2040 and new DECRSP, per HCD direction.
Millbrae	300 El Camino Real	94030	024-154-240		DECRSP Area	DECRSP, Downtown and El Camino Real Specific Plan	70	130	0.2287	Commercial	YES - Current	NO - Privately-Owned	Pending Project	Not Used in Prior Housing Element	0	0	14	14	Restaurant, Project Under Review,Built in 1946	Downtown and El Camino Real Specific Plan	Current GP and Zoning Designation reflect General Plan 2040 and new DECRSP, per HCD direction.
Millbrae	230 Broadway	94030	024-152-180		DECRSP Area	DECRSP, Downtown and El Camino Real Specific Plan	25	50	0.54	Mixed Use	YES - Current	NO - Privately-Owned	Pending Project	Used in Prior Housing Element - Non-V	0	0	5	5	First floor Retail, Second floor Residential, 1, Development Under Review, Built in 1938	Downtown and El Camino Real Specific Plan	Current GP and Zoning Designation reflect General Plan 2040 and new DECRSP, per HCD direction.
Millbrae	150 Serra Avenue	94030	024-337-010	E	MSASP Area	MSASPD, Millbrae Station Area Specific Plan	0	130	2.68	Commercial	YES - Current	NO - Privately-Owned	Pending Project	Not Used in Prior Housing Element	0	0	0	0	One-story Office, Approved for Development	Millbrae Station Area Specific Plan	
Millbrae	150 Serra Avenue	94030	024-337-080	E	MSASP Area	MSASPD, Millbrae Station Area Specific Plan	0	130	0.57	Commercial	YES - Current	NO - Privately-Owned	Pending Project	Not Used in Prior Housing Element	0	0	0	0	One-story Office, Approved for Development	Millbrae Station Area Specific Plan	
Millbrae	150 Serra Avenue	94030	024-337-090	E	MSASP Area	MSASPD, Millbrae Station Area Specific Plan	0	130	0.6087	Commercial	YES - Current	NO - Privately-Owned	Pending Project	Not Used in Prior Housing Element	49	24	415	488	One-story Office, Approved for Development	Millbrae Station Area Specific Plan	
Millbrae	150 Serra Avenue	94030	024-154-460	E	MSASP Area	MSASPD, Millbrae Station Area Specific Plan	0	130	0.6348	Commercial	YES - Current	NO - Privately-Owned	Pending Project	Not Used in Prior Housing Element	0	0	0	0	One-story Office, Approved for Development	Millbrae Station Area Specific Plan	
Millbrae	130-140 El Camino Real	94030	024-335-150		MSASP Area	MSASPD, Millbrae Station Area Specific Plan	0	80	3.1	Commercial	YES - Current	NO - Privately-Owned	Pending Project	Not Used in Prior Housing Element	3	0	27	30	One-story Office, Project Under Review	Millbrae Station Area Specific Plan	
Millbrae	300 Millbrae, Bldg. 6A	94030	024-181-080		MSASP Area	MSASPD, Millbrae Station Area Specific Plan	0	130	0.1148	Vacant	YES - Current	NO - Privately-Owned	Pending Project	Not Used in Prior Housing Element	79	0	0	79	Vacant, Nearing Construction Completion	Millbrae Station Area Specific Plan	
Millbrae	300 Millbrae, Bldg 6B	94030	024-180-350		MSASP Area	MSASPD, Millbrae Station Area Specific Plan	0	130	0.09	Vacant	YES - Current	NO - Privately-Owned	Pending Project	Not Used in Prior Housing Element	0	20	300	320	Vacant, Nearing Construction Completion	Millbrae Station Area Specific Plan	
Millbrae	39 El Camino Real	94030	024-334-150		MSASP Area	MSASPD, Millbrae Station Area Specific Plan	0	60	0.57	Commercial	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-V	0	32	0	32	Retail, MSASP Favorable Site, 50% Vacant or Dilapidated	Millbrae Station Area Specific Plan	
Millbrae	15 El Camino real	94030	024-334-020	F	MSASP Area	MSASPD, Millbrae Station Area Specific Plan	0	60	0.2	Commercial	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-V	0	34	0	34	Retail, MSASP Favorable Site, Listed for Rent	Millbrae Station Area Specific Plan	
Millbrae	9 El Camino real	94030	024-334-030	F	MSASP Area	MSASPD, Millbrae Station Area Specific Plan	0	60	0.41	Commercial	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-V	0	0	0	0	Retail, MSASP Favorable Site, Listed for Rent	Millbrae Station Area Specific Plan	
Millbrae	450 Chadborne	94030	024-275-120		Medium Density Res	R-1, Single Family	0	8.71	0.63	Educational/Institutio	YES - Current	NO - Privately-Owned	Pending Project	Not Used in Prior Housing Element	0	0	1	1	Church, Approved ADU Development		
Millbrae	95 Murchison Dr	94030	024-344-090		DECRSP Area	DECRSP, Downtown and El Camino Real Specific Plan	70	130	3.1	Commercial	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	125	0	219	344	Grocery, DECRSP Favorable Site, Built in 1966	Downtown and El Camino Real Specific Plan	Current GP and Zoning Designation reflect General Plan 2040 and new DECRSP, per HCD direction.
Millbrae	842 Clearfield	94030	021-442-090		Low Density Reside	R-1, Single Family	0	8.71	0.11	Vacant	YES - Current	NO - Privately-Owned	Pending Project	Not Used in Prior Housing Element	0	0	1	1	Vacant, Approved for Development		
Millbrae	990 Larkspur	94030	021-210-280		Low Density Reside	R-1, Single Family	0	8.71	0.09	Vacant	YES - Current	NO - Privately-Owned	Pending Project	Not Used in Prior Housing Element	0	0	1	1	Vacant, Approved for Development		Current GP and Zoning Designation reflect General Plan 2040, per HCD direction.

Table C: Land Use, Table Starts in A2

Zoning Designation From Table A, Column G and Table B, Columns L and N (e.g., "R-1")	General Land Uses Allowed (e.g., "Low-density residential")
R-1, Single Family	Low Density Residential, Medium Density Residential
DECRSP, Downtown and El Camino Real Specific Plan	DECRSP Area
MSASPD, Millbrae Station Area Specific Plan	MSASP Area
CMU, Commercial Mixed Use	Mixed Use