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HOUSING CONSTRAINTS AND RESOURCES

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

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

A. GOVERNMENTAL CONSTRAINTS

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

existing governmental constraints and the ways in which the city has worked to reduce or remove them over the last Housing Element cycle.

1. LAND USE REGULATIONS

SAN BRUNO 2025 GENERAL PLAN

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

- **Very Low Density Residential.** Single-family detached residential development at a density of 0.1 to 2.0 units per acre; innovative development patterns, preservation of natural features, pedestrian paths, and other amenities are encouraged.
- **Low Density Residential.** Single-family detached development at a density of 2.1 to 8.0 units per acre; single-family attached development may be allowed where clustering permits additional open space.
- **Medium Density Residential.** Residential development at a density of 8.1 to 24.0 units per acre; allows for single-family detached and attached housing, small-lot and zero-lot-line development, and duplexes.
- **High Density Residential.** Allows single-family attached and multi-family residential development at a density of 24.1 to 40.0 units per acre; includes ancillary uses such as rooming and boarding houses, sanitariums, and rest homes.
- **Central Business District (Downtown Mixed Use).** Allows 3.0 base maximum floor-area-ratio (FAR) combined for all uses (residential and non-residential), with no separate residential density limitation. Downtown Mixed Use permits one or more of a variety of uses, including: retail sales; hotels; eating and drinking establishments; personal and business services; professional and medical offices; financial, insurance, and real estate offices; theaters and entertainment uses; educational and social services; and government offices. Active uses are required at the ground level, and residential use is permitted on second and upper floors only. Wholesale trade, drive-through facilities, and auto-related uses are prohibited.
- **Transit-Oriented Development (TOD).** Allows 2.0 base maximum FAR combined for residential and/or non-residential, and no FAR limit for parcels of 20,000 square feet or larger, as outlined in the Transit Corridors Plan. In addition to FAR limits, no maximum residential density is required for individual residential projects. However, the Transit Corridors Plan provides for a maximum of 1,610 housing units in the TCP area. City Council action and subsequent environmental review would be required to increase the maximum number of units. This classification permits a variety of uses, either individually or in mix with other permitted uses, including retail sales; eating and drinking establishments; personal and business services; professional and medical offices; financial, insurance, and real estate offices; hotels and motels; educational and social services; government offices; and residential. This designation is generally applied in key corridors such as San Bruno Avenue and El Camino Real in areas with proximity to BART and Caltrain stations.
- **Multi Use – Residential Focus.** Allows 2.0 base maximum FAR combined for residential and/or non-residential, 3.0 maximum for parcels of 20,000 square feet or larger, with non-residential use not exceeding 0.6 FAR. Residential density shall not exceed 40.0 units per acre (before state-mandated affordable housing density bonus). The city may grant a discretionary bonus of up to 8.0 units per acre for projects that undertake public right-of-way streetscape improvements in accordance with criteria established by the city. Multi Use – Residential Focus extends south along El Camino Real from Crystal



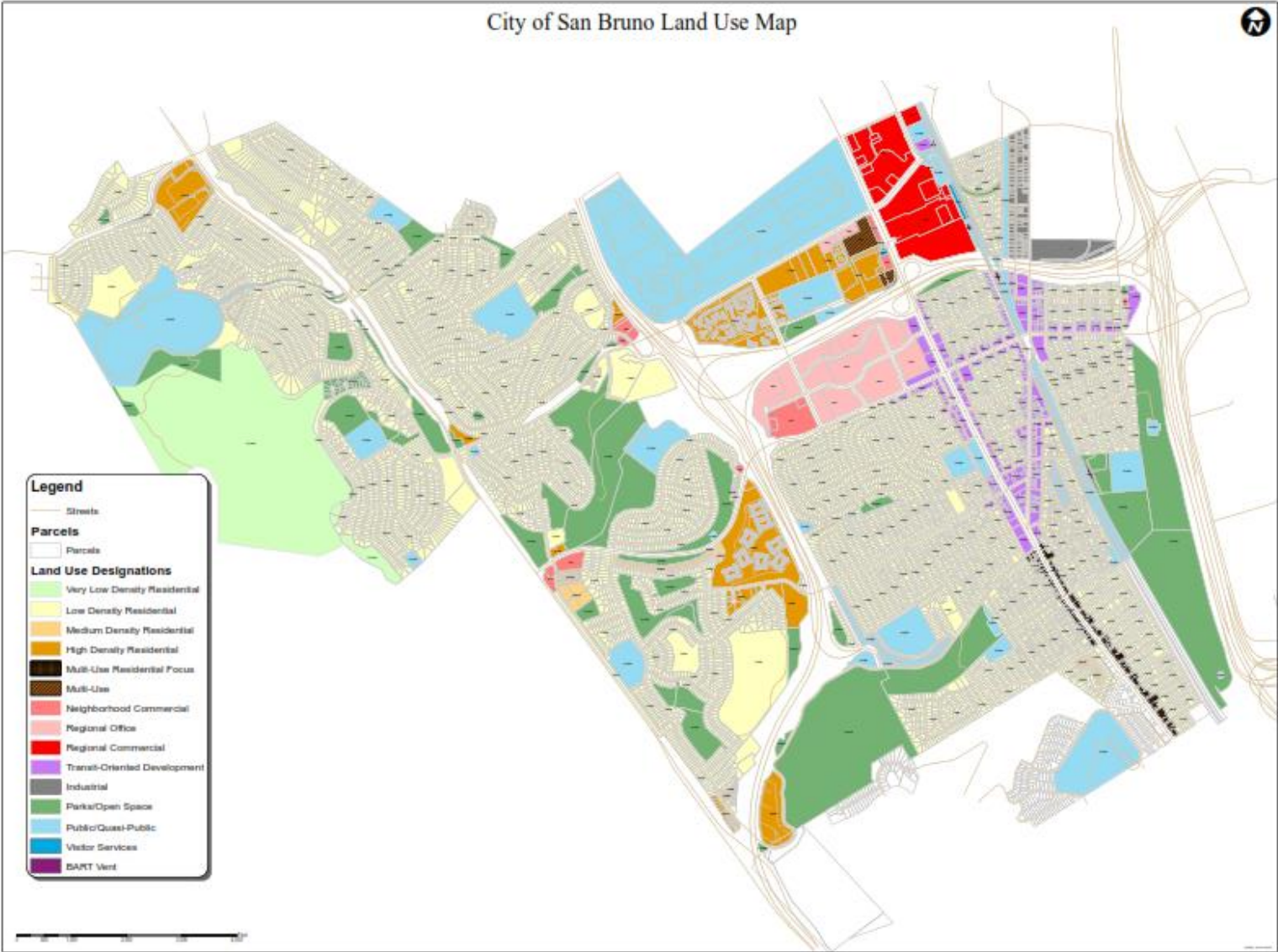


Figure 3-1 San Bruno 2025 General Plan Land Use Diagram

Source: xx

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

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

TRANSIT CORRIDORS PLAN

The city adopted the Transit Corridors Plan in February 2013 that focuses on commercial/transit corridors of El Camino Real, San Bruno Avenue, and San Mateo Avenue, adjacent to the future location of the Caltrain Station on San Bruno Avenue. The Plan serves as the regulatory document to implement the new General Plan Update transit-oriented development and mixed-use land use classifications. The Plan includes design guidelines, development regulations, parking standards, and an implementation strategy that will facilitate development of mixed-use projects in the area.

PARKING

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

Neighborhood parking is a concern of San Bruno residents adjacent to the city’s major thoroughfares. Though San Bruno’s updated parking requirements are similar to the parking requirements in other cities in San Mateo County, they could still be considered a barrier to the development of affordable housing. Recent development applications and inquiries indicate that a lower parking space per unit ratio has been requested by housing developers.. Fewer parking spaces can increase the affordability of housing by lowering construction costs and allowing more units, particularly when the housing is transit-accessible and caters to



TABLE 3-1 TITLE NEEDED

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

Source: xx.

smaller households that have less demand for parking. As most of the opportunity sites in this Housing Element cycle are infill redevelopment in transit accessible commercial corridors, this finding may apply to many of these parcels. Since the city requires affordable units in every development, developers are consistently requesting a reduction in parking by requesting a concession pursuant to state density bonus law.

PLANNED DEVELOPMENT DISTRICT

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

San Bruno’s largest Planned Development site is the former U.S. Navy site, now called The Crossing. Since 1999, the city has worked with the developer and consultants to prepare a U.S. Navy Site and Its Environs Specific Plan (January 2001, amended January 2002 and August 2005), entered into a Development Agreement (February 2002), and has granted building permits for all four phases of residential construction, resulting in the completion of 1,063 multi-family apartments. All four phases are complete as of 2011. Other large Planned Development projects under construction or approved include Skyline College, approved for 70 units in 2018 and completed in 2022, and Mills Park, approved for 427 units in 2020 and currently awaiting building permit submittal.

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

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

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

- *Aircraft Noise Impact Reduction* – To reduce the potential number of future airport area residents who could be exposed to noise impacts from airport and aircraft operations.
- *Safety of Persons on the Ground and in Aircraft in Flight* – To minimize the potential number of future residents and land use occupants exposed to hazards related to aircraft operations and accidents.

- *Height Restrictions/Airspace Protection* – To protect the navigable airspace around the Airport for the safe and efficient operation of aircraft in flight.
- *Overflight Notification* – To establish an area within which aircraft flights to and from the Airport occur frequently enough and at a low enough altitude to be noticeable by sensitive residents. Within this area, real estate disclosure notices shall be required, pursuant to state law.

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

ZONING REGULATIONS

In March of 2021, San Bruno completed Phase II of the Zoning Code update. Among the many updates made was the rezoning of properties within the Transit Corridors Plan Area for consistency with the General Plan and the specific plan itself. A summary of the city's zoning development standards is shown in table 3.1-2. Since the rezoning was completed, the city has received 4 housing development proposals.

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

The development standards for the residential districts rely upon FAR in R-1 and R-2 districts to control building size. Minimum yard and lot coverage requirements are then applied in all residential districts. Other than FAR, the city has identified the minimum lot area per dwelling unit requirement in the R-2, R-3, and R-4 districts as an impediment to the creation of additional housing units. A standard size lot in San Bruno is 5,000 square feet. Since the lot area required per unit is 2,900 square feet in the R-2 zone, a standard size lot would be permitted to have one dwelling unit. A standard size lot in a R-3 district would only be permitted to have two dwelling units since the minimum lot area per unit is 1,950 square feet. A standard size lot in a R-4 district would be permitted to have three dwelling units, since the minimum lot area required per unit is 1,450 square feet. Permitting two dwellings in the R-2 District, regardless of lot size, would make it feasible to add more housing in the district. Additionally, FAR requirements, which generally allow 2,750 square feet of gross floor area and 2,200 square feet of lot coverage, the same floor area allowed in the R-1 district, could be relaxed in the R-2 District to provide more development potential. Similar adjustments in development standards for the R-3 and R-4 zones would allow for additional units.



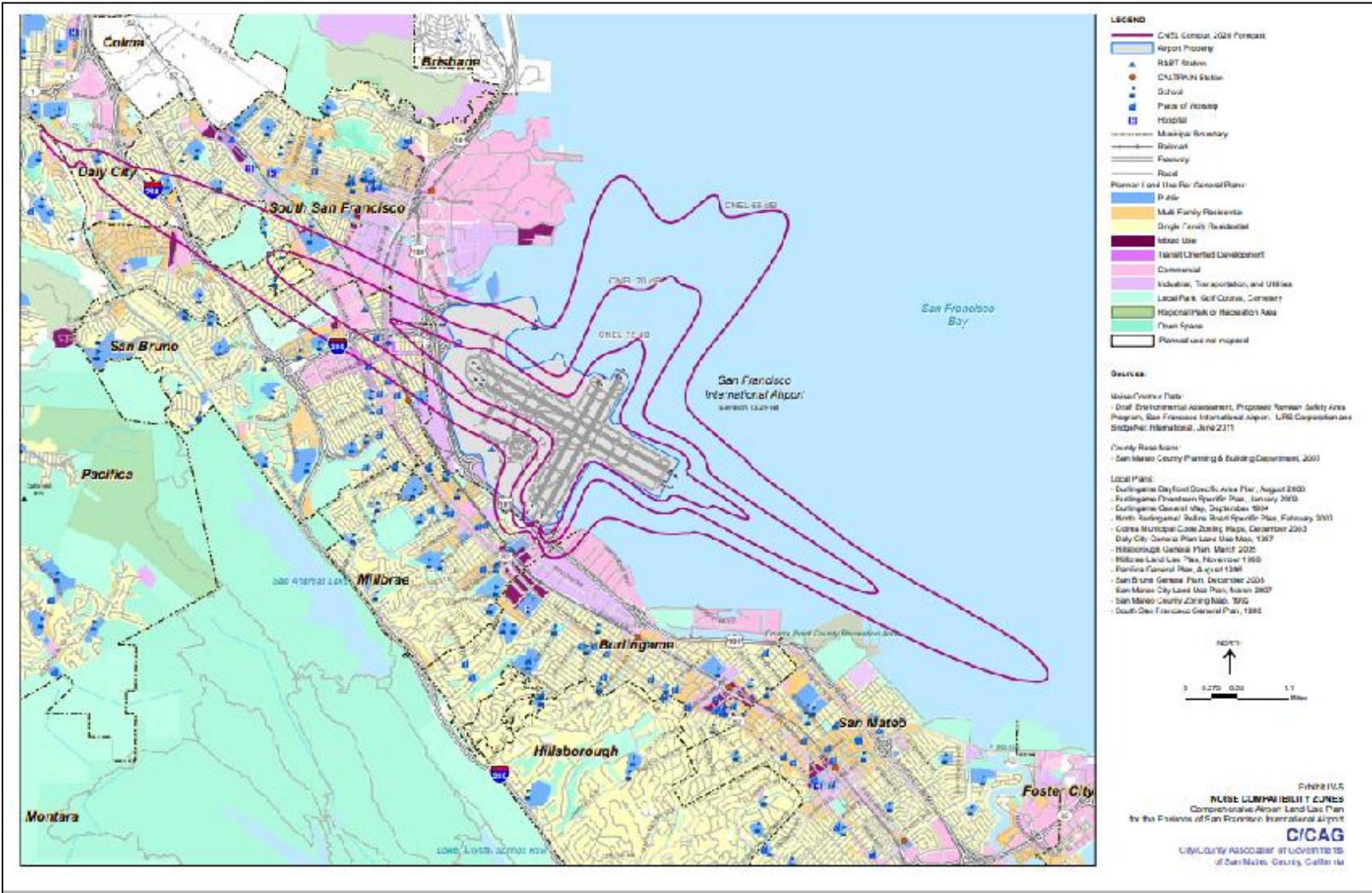


Figure 3-2 SFO ALUCP Map of Noise Compatibility Zones

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

	R-1/R-1-D	R-2	R-3	R-4
Minimum Building Site Required (sq ft)	5,000 interior lot 6,000 corner lot	5,000 interior lot 6,000 corner lot	5,000 interior lot 6,000 corner lot	5,000 interior lot 6,000 corner lot
Minimum Lot Area per Unit (sq ft)	n/a	2,900	1,950	1,450
Minimum Lot Width (ft)	50 interior lot 60 corner lot	50 interior lot 60 corner lot	50 interior lot 60 corner lot	50 interior lot 60 corner lot
Maximum Lot Coverage	80% impervious surface 40% structures	85% impervious surface 55% structures	85% impervious surface 60% structures	85% impervious surface 60% structures
Minimum Yards (ft)				
Front	15	15	15	15
Side	5 interior lot 10 corner lot	5 interior sides 10 street sides	5 interior sides 10 street sides	5 interior sides 10 street sides
Rear	10	10	10	10
Minimum Setback from Sidewalk to Garage (ft)	20	20	20	20
Maximum Height (ft)	35	35	50 ft or 3 stories, whichever is most restrictive	50 ft or 3 stories, whichever is most restrictive
Parking				
Single-Family	2 car garage or carport per unit.			
Single-Family with ADU	2 parking spaces for single-family and one parking space for ADU.			
Duplex (2 units, 3br each)	4 covered spaces.			
Studio	1 parking space per unit.			
Apartment	1 covered space per bedroom with a maximum of two spaces.			
Mobile Home Park:	2 spaces per site. Parking may be tandem. One additional space for each 10 sites for laundry and recreational facilities.			
Rooming House, Lodging House	1 space for each two sleeping rooms.			
Guest Parking	In all instances, guest parking must consist of 0.1 spaces per unit.			

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



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

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

^a Footnote missing.

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

REASONABLE ACCOMMODATIONS

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

The San Bruno City Council adopted a Reasonable Accommodation Ordinance in 2014 (Ordinance 1825), amending the city’s Zoning Ordinance to provide exceptions in zoning and land use for housing for persons with disabilities in compliance with state law. For specific reasonable accommodations requests, San Bruno’s procedure is to process some of these requests over the counter. For example, a request for building a wheelchair ramp is processed over the counter and requires only a building permit. City code allows a ramp to extend 6 feet into the 15-foot front yard setback, so it is unlikely that any further planning review would be necessary. All building permits submitted in San Bruno are reviewed against the current California Building Code, as adopted by the city. No local amendments to these codes would diminish the ability of the city to accommodate persons with disabilities. Retrofits and building improvements made according to the Americans with Disabilities Act (ADA) are reviewed by the Building Division.

RESIDENTIAL CARE FACILITIES (INCLUDING SUPPORTIVE AND TRANSITIONAL HOUSING)

Residential care facilities of any size are allowed by right in the R-1, R-2, R-3, and R-4 residential zones. “Residential care facility” means a licensed residential facility providing social and personal care for residents. Examples include children’s homes, supportive and transitional houses, orphanages, rehabilitation centers, self-help group homes, and transitional housing for homeless individuals. The definition of a residential care facility excludes facilities where medical care is a core service provided to residents, such as nursing and convalescent homes. A large residential care facility is a residential care facility for seven or more persons. A small residential care facility is a residential care facility for less than seven persons. Regardless of the number of patients allowed in a residential care facility, residential care facility is seen the same as any residential use. The Fire Department and Building Division inspect the residential care facility for compliance with codes as part of the building permit process. No noticing (or community input) is required for the establishment of a new or renovated residential care facility.

Residential care facilities are allowed in any zoning district in San Bruno and there is no requirement for minimum distances from one to another residential care facility. There is no explicit requirement that would preclude a specific type of special residential care facility to be established, which could include supportive, transitional, or emergency housing. Supportive and transitional housing are permitted just as any other residential uses.

The city’s Zoning Ordinance is compliant with Fair Housing Law. The city updated the Zoning Ordinance in March 2021 to ensure consistency between the General Plan, Housing Element, and Zoning Ordinance. The update included an amendment to regulate “special residential care facilities” that is consistent with state law.



2. ORDINANCE 1284 HEIGHT AND DENSITY LIMITS

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

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

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

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

Ordinance 1284 is most restrictive to existing residential zoned parcels because of the limits imposed on increased densities (See below for a description of the treatment of second units specifically). This is because the ordinance was designed as a preservation measure. However, Ordinance 1284 is not considered a major constraint to affordable housing development in this Housing Element because most identified housing opportunity sites are located in the TCP area where height limits have increased due to the passage of Measure N, as described in the next section below. Height limits of 50 feet still apply in other parts of the city, but in general the provisions of Ordinance 1284 are limited in scope and applicability for these parcels. For instance, Ordinance 1284 does not prohibit any of the following along the target corridors:

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

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

Potential constraints to housing development as a direct result of declaring Crystal Springs Road and Sneath Lane as scenic corridors are also minimal. Major adjacent properties include the Golden Gate National Cemetery, City Park, Junipero Serra County Park, and interstate highway rights-of-way, all of which are

already unsuitable locations for housing development. Moreover, the designation of these two roadways does not prohibit development, but merely the widening of the roadways themselves.

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

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

3. MEASURE N

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

Measure N modifies Ordinance 1284 to permit the following:

- Buildings exceeding the current 50-foot or three-story maximum height as follows: up to 70 feet or five stories along El Camino Real, building up to 65 feet or five stories along San Bruno Avenue, building up to 55 feet or four stories along San Mateo Avenue, and up to 90 feet or seven stories in the Caltrain station area.
- Rezoning of 42 low-density residential parcels to become a part of the TCP area and allow higher density residential development.
- Above-ground, multi-story parking garages.

4. ACCESSORY DWELLING UNITS (ADUs)

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

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

5. DEVELOPMENT REVIEW PROCESS

Generally, all projects undergo a development review process through the Planning Division to ensure compatibility and safety of development throughout San Bruno. Building and construction permits and



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

TABLE 3-4 HOUSING TYPES PERMITTED BY ZONING DISTRICT

Housing Types	ZONE								
	R-1	R-2	R-3	R-4	C-B-D	TOD-S	TOD-1	TOD-2	MX-R
SF-Detached	P	P	P	P					
SF-Attached	P	P	P	P					
Duplex			P	P					
3+ DU				P	P	P	P	P	P
Residential Care =< 6P ^a	P	P	P	P	P	P	P	P	P
Residential Care > 6P ^a	P	P	P	P	P	P	P	P	P
Mobile-Homes	CUP	CUP	CUP	CUP					
Manufactured Homes	P	P	P	P					
Accessory Dwelling Unit	P	P	P	P	P	P	P	P	P
Boardinghouse			CUP	CUP	CUP	CUP	CUP	CUP	CUP
Live/Work					CUP	P	P	P	P
Multi-Family Homes		CUP	P	P	P	P	P	P	P

^a Footnote missing.

Source: San Bruno Planning Division.

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

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

TABLE 3-5 TIMELINES FOR PERMIT PROCEDURES IN SAN BRUNO

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

Source: San Bruno Planning Division.

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

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

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

Source: San Bruno Planning Division.

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

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



While the city’s General Plan and Zoning Ordinance bring uniformity and fairness to the regulation of the community’s housing stock, they do not adequately address many unique conditions that result from the city’s historic development patterns and great diversity. Therefore, the city developed and implemented Residential Design Guidelines in 2010, to assist the staff, Planning Commission, and City Council when considering exterior design of single-family and two-family residences in the city that require discretionary approval or a building permit. The design guidelines are intended to assist homeowners and builders in designing their projects with sensitivity to their neighbors, and to communicate the community’s expectations regarding new residential construction. The guidelines address important planning and design issues that are not covered by the city’s primary regulatory documents, including enhancing the identity of residential neighborhoods, assuring compatibility in scale of structures within residential neighborhoods, controlling development of hillside lots, and encouraging the construction of Green Buildings. The purpose of the design guidelines is not to be cost prohibitive but to streamline the design review process by more clearly communicating community expectations to property owners and builders.

To increase approval certainty and reduce debating design recommendations, adopting objective design guidelines as part of the zoning code for large and small multi-family housing and mixed-use projects will improve and shorten the review process for these projects. Similar amendments can be made to the to the city’s current Residential Design Guidelines.

6. FEES AND EXACTIONS

San Bruno has established fees for building permits and planning services for all residential developments. San Bruno’s fees have traditionally been far lower than neighboring jurisdictions but in 2021 the City Council adopted a “cost recovery” fee structure based on a comprehensive permit fee nexus study. As shown in Table 3-7, 2022 development fees for a model single-family for-sale home total approximately \$33,657, while those for a new multi-family rental unit in an apartment complex total approximately \$28,927. Other planning fees are listed in Table 3-7. These costs are estimates of potential building and planning fees, and do not include environmental review costs or the costs of providing new, or upgrading existing, infrastructure. Though the fees are reasonable, they increase the development cost of residential units. The building fees are still a small portion of overall housing development costs. (See Appendix B for information about residential land and construction costs.)

TABLE 3-7 AFFORDABLE HOUSING LINKAGE FEE

Unit Type	Fee (per sq ft)
Single-Family	\$30.00
Condominium (per sq ft)	\$27.78
Apartment (per sq ft)	\$27.78
Office (per sq ft)	\$13.89
Retail (per sq ft)	\$6.94
Hotel (per sq ft)	\$13.89

Source: xx.

A development impact fee, adopted in 2019 replaced the City’s Park In-lieu Fee for conventional single-family residential subdivision. The purpose of the fee is to offset the costs of public facilities and services that are needed to serve demand created by the development project and its residents into the future.

AFFORDABLE HOUSING PROGRAM AND IN-LIEU FEE

San Bruno’s Affordable Housing Program, which was amended in March 2021, requires new residential developments of 10 or more units to provide a minimum of 15% of total units to very low-, low-, and moderate-income households. For ownership housing, 10% of units must be affordable to moderate-income households and 5% of the units must be affordable to low-income households. For rental housing, 5% of the units must be affordable to very low-income households, 5% of the units must be affordable to low-income households, and 5 percent of the units must be affordable to moderate-income households. The Ordinance

requires that affordable units are comparable in number of bedrooms, exterior appearance, and overall quality of construction to market rate units in the same project.

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

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

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

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

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

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

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

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

FEES FOR PROJECT ENTITLEMENT APPLICATIONS

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

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

	Application Fee (\$)
Architectural Review*	\$2,097
Conditional Use Permit	\$2,301
Development Agreement*	Deposit
General Plan Amendment*	Deposit
Minor Modification	\$1,287.50
Miscellaneous Required Review	\$1,329
Parking Compliance	\$1,000
Planned Development Permit*	Deposit
Planned Unit Permit*	Deposit
Temporary Use Permit	\$1,368
Variance	\$2,575
Zoning Amendment *	Deposit

* Estimates; the applications require a deposit. The applicant is responsible for actual cost of staff and consultant time.
Source: City of San Bruno Community and Economic Development Department, 2022.

COMPARISON TO OTHER SAN MATEO COUNTY JURISDICTIONS

According to the survey conducted by San Mateo County through its 21 Elements process, total fees for single-family housing vary significantly by jurisdiction from \$15,941 to \$104,241 (see Table 3-9). Total fees for small and large multi-family housing developments also vary between jurisdictions. In this context, San Bruno's fees associated with multi-family residential development are within the range of jurisdictions in the county and thus would not be considered a barrier to housing development.

TABLE 3-9 SAN MATEO COUNTY JURISDICTIONS TOTAL FEES (2022)

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

*Source: Fees survey conducted by 21 Elements.

7. INFRASTRUCTURE

THE NETWORK

As a built-out community, San Bruno's infrastructure network has been extended to virtually every corner of the city. All of the housing opportunity sites proposed in this Housing Element are on existing developed property connected or adjacent to all city services. Redevelopment of these infill sites may require infrastructure improvements by the city or the developer to upgrade aging infrastructure or to increase capacity. Developers are required to pay fees for service hook-ups and/or for their proportionate share of improvements to the water treatment plant. The provision of on-site improvements, such as streets, curbs, gutters, sidewalks, landscaping, drainage, water, and sewer infrastructure, are standard conditions of development approval and have not been barriers to affordable housing development in the past. If off-site infrastructure improvements are required, these may be the responsibility of the developer if the upgrade is not currently in the Capital Improvement Program or if the improvements are included in the nexus study conducted to assess development impact fees for infrastructure. Infrastructure costs are incorporated into the total residential development project costs discussed under Market Constraints below.

WATER SUPPLY

Water supplied through the city's water system is a combination of purchased water and groundwater pumped from the city's groundwater supply wells. The city purchases its treated surface water from San Francisco Public Utilities Commission (SFPUC) and North Coast County Water District (NCCWD). According to the San Bruno Urban Water Management Plan (UWMP) (2021), the city receives water from



two major supply sources: wholesale surface water from the San Francisco Public Utilities Commission (SFPUC) Regional Water System and local groundwater from the Westside Basin. San Bruno has historically used SFPUC regional water supplies to meet demands that could not otherwise be met through local groundwater production.

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

Identified developments are projected to increase water demand by approximately 1.1 million gallons per day (mgd). The majority of demand from identified developments are in the Transit Corridors Plan area (0.42 mgd) and the Bayhill Specific Plan area (0.52 mgd). Also included in the projected buildout demand is an additional 0.55 mgd of water demand from unidentified future development to account for additional growth that could potentially occur by 2040 (e.g., ADUs and additional units created by density bonuses). Therefore, an additional 0.55 mgd of future demands was allocated to Zone 1 to 4 to accommodate future development in the TCP. Table 3-10 shows that the total projected city water demand at buildout of 4.78 mgd. This is consistent with the 2040 demand projection presented in the city's 2020 UWMP. As such, water supply is not expected to be a constraint to future housing development.

TABLE 3-10 SAN BRUNO WATER DEMAND COMPARISON

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

^a Footnote missing.

^b Footnote missing.

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

WASTEWATER TREATMENT

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

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

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

SOLID WASTE DISPOSAL

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

8. BUILDING CODE AND ENFORCEMENT

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

- Complete removal of old roof materials required before replacement.
- Minimum roof quality required is Class B.
- Addition of sprinklers required in the rehabilitation of any building over 7,500 square feet.
- Noise insulation required for residential structures within the 65 dB community noise equivalent level (CNEL) or greater (necessary to meet Federal Aviation Administration standards).

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

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

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

9. FORMER REDEVELOPMENT AGENCY

The enactment of ABx1 26 dissolved all redevelopment agencies in California on February 1, 2012, and created successor agencies to wind down their operations. Low- and Moderate-Income Housing (LMIH) tax increment generated from the San Bruno Redevelopment Project Area was the city's main source of funding for affordable housing. San Bruno had one Redevelopment Project Area, which was established in July 1999. During its 13 years of operation, the Redevelopment Agency facilitated the development of 97 units of affordable to very low-income households. The city monitors new state legislation that may restore some state funding for affordable housing.

10. HOUSING CHOICES VOUCHER PROGRAM

The Housing Choices Voucher Program (formerly Section 8) is government assistance to help low-income families obtain safe, decent, and affordable housing. The Housing Voucher Program is a federal rent subsidy program for low-income families. The program is funded by the federal government's Housing and Urban Development Department (HUD) and administered in San Mateo County by the Housing Authority of the County of San Mateo (HACSM). To qualify for assistance, a family must have a gross household income of less than 50% of the HUD-determined median income for this county. Only families certified by the HACSM are eligible to participate. Under certain circumstances, the program may also be used to assist the household in purchasing a home. Families that receive vouchers can select units with rents that are either below or above market rate. The recipient of the voucher is responsible for finding appropriate housing within the private market. HUD mandates that the voucher recipient household must pay 30% of its monthly adjusted gross income for rent and utilities. HUD, through the County Housing Authority, then pays the remainder of the rent directly to the landlord. If the household chooses a unit where costs are greater than market rate, the voucher recipient is expected to pay the additional amount. San Mateo County assists more than 4,300 families and many people are on the waiting list.

PROGRAM ADVANTAGES

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

11. PROGRAM DISADVANTAGES

- **Difficulty of Move-In:** There is a lengthy process of paperwork and inspections before a tenant can move in and use the program..
- **Wear and Tear:** Most program tenants have large families and limited work, which means they are at home more often than a working family with fewer children. As a result, the property experiences more wear and tear.

B. FUNDING SOURCES FOR AFFORDABLE HOUSING

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

approvals, work with the community and design and construct the building, to leasing the building to residents.

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

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

Federal Programs include:

 - Community Development Block Grant (CDBG)
 - HOME Investment Partnerships Program (HOME)
 - Low Income Housing Tax Credits (LIHTC)
 - Section 8 Rental Assistance Program
- **Loans and Grants from State Government:** The State of California has been a longtime major funder of affordable housing through the Multi-Family Housing Program (MHP), which is primarily supported by periodic statewide housing bonds. In recent years, several other major state programs have been key funding sources for transit-oriented development, infill development, housing for veterans, housing for people experiencing or at risk of homelessness, housing for people with mental health challenges, and other groups of people with special needs.⁴ These programs, primarily administered by HCD, have been a critical source of gap financing, as the loans are of significant size, but they can only fund a limited number of projects and are often very competitive.

State Programs include:

 - Permanent Local Housing Allocation (PLHA)
 - Other State Sources (CALHome, CalHFA, etc.)
- **Loans and Grants from Regional Government:** Until now, MTC and ABAG have had a somewhat limited role in funding affordable housing. The Transit-Oriented Affordable Housing Fund (TOAH) was one exception. However, in 2019, state legislation created the Bay Area Housing Finance Authority (BAHFA), which intends to put a revenue measure on the ballot to fund affordable housing across the Bay Area. The COVID-19 pandemic led to the decision to delay a planned November 2020 ballot measure.
- **Loans and Grants from Local Government:** Local government also provides important gap funding to affordable housing. Sources include housing bonds issued primarily at the county level, sales tax



measures, inclusionary in-lieu fees paid by market-rate development and jobs-housing linkage fees that new commercial development may pay. Other taxes are being explored by many local jurisdictions. The end of this section includes more on county funding. **Local Programs include:**

- Housing Successor Agency for the Redevelopment Agency
 - Below Market Rate Program (BMR)
 - Commercial Linkage Fee (CLF)
- **Project-based Section 8:** Housing authorities have the ability to allocate Section 8 or Housing Choice Vouchers to projects, rather than to individual households. This can be an important source of stable rental revenue for affordable housing developments. Furthermore, these projects can borrow against that anticipated income, increasing the amount of upfront capital available during the development process.
 - **Private Loans and Grants:** Community-minded banks, community development financial institutions (CDFIs), philanthropy and other private sources are a potential source of funding for affordable housing. In recent years, technology companies based in the Bay Area have been particularly encouraged to participate in solutions to the region’s housing crisis and have made commitments to support affordable housing through both loans and grants. **Private For-Profit and Nonprofit Sources include:**
 - Community Reinvestment Act (CRA)
 - Private Developers
 - Non-Profit Agencies
 - Housing Endowment and Regional Trust (HEART)
 - **San Mateo County:** The county is a key affordable housing partner for cities in San Mateo County. The County of San Mateo Department of Housing includes both Housing and Community Development (HCD) and the Housing Authority of the County of San Mateo (HACSM). The department issues two annual Notices of Funding Availability (NOFAs)—a HUD program NOFA in the winter and one local funding NOFA in the summer. The county’s local funds NOFA (the Affordable Housing Fund (AHF)) is the larger of the two NOFAs and makes funds available from several state and county sources, including Measure K, county’s 2016 ½-cent sales tax measure, for the construction and rehabilitation of affordable housing. Cities should reach out to the county early and often to understand whether the AHF, housing authority vouchers, or other county resources may be appropriate for affordable housing projects in their jurisdictions. The HUD programs NOFA and the AHF NOFA are regularly oversubscribed. As a result, the county has developed funding priorities to inform the selection of projects to fund through its NOFAs.

C. ENVIRONMENTAL CONSTRAINTS

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

1. GEOLOGIC AND SEISMIC HAZARDS

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

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

The San Andreas Fault Special Studies Zone runs roughly along either side of Skyline Boulevard. State law requires cities and counties to regulate development within such zones and precludes construction of a structure for human occupancy, except certain wood-frame single-family dwellings, on an active fault trace or within 50 feet of an active fault. This is not considered to be a constraint, because none of the housing opportunity sites in this Housing Element are in earthquake zones.

2. STORM FLOODING

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

3. AIR QUALITY

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

4. NOISE

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



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

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

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

The eastern neighborhoods in San Bruno that are impacted by noise are impacted from all the noise sources described above. Overflight noise from aircraft associated with SFO is considered a constraint to housing production because the housing units will need to be built to higher noise insulation standards which will increase building costs.

D. MARKET AND OTHER NON-GOVERNMENTAL CONSTRAINTS

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

1. VACANT/UNDERDEVELOPED LAND

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

2. OVERCOMING CHALLENGES OF SMALL SITES

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

allows unlimited housing density for sites 20,000 square feet or larger within the TCP area, which encourages lot consolidation.

3. RESIDENTIAL LAND COSTS

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

4. CONSTRUCTION COSTS

Construction costs in the Bay Area are extremely high. Construction costs include both hard costs, such as labor and materials, and soft costs, such as architectural and engineering services and insurance. For multi-family homes in San Mateo County, hard costs account of 60-65% of the building cost and soft costs average around 15-20% (the remaining 15-20% is land costs). For single-family homes, hard costs often are roughly 40% of the total cost, soft costs are 20%, and land is 40%.

According to research commissioned by 21 Elements (see Appendix B), construction costs for multi-unit buildings vary based on the form of parking (structured vs. surface) in addition to other environmental factors such as topography, pre-existing structures etc. For a larger, multi-unit buildings (100+units), costs can vary but averaged \$612,000/unit, not including city fees and land costs. The cost per square foot is \$816.

Without subsidies, new for-profit housing is likely to be unaffordable to extremely low-, very low-, low-, and some moderate-income households. Reductions in amenities and lower-quality building materials can reduce sales and rental prices, but minimum building and safety standards must be maintained. In certain cases, greater density can increase the affordability of residential projects by reducing per-unit costs. This housing element proposes several policies that can help reduce the cost of construction for affordable housing such as reduced parking requirements for multi-family housing.