

September 11, 2024

State Department of Housing and Community
Development
C/O Land Use and Planning Unit
2020 W. El Camino Ave, Suite 500
Sacramento, CA 95833
Via Email: HousingElements@hcd.ca.gov



SUBJECT: Submittal of Adopted Belmont Housing Element 2023-2031

The City of Belmont is pleased to submit the newly adopted General Plan Housing Element 2023-2031. This version of the housing element was submitted in draft form to HCD for review and was the subject of the July 26, 2024 letter from HCD, stating that it met the statutory requirements of State Housing Element Law. At their September 10, 2024 meeting, the Belmont City Council repealed the previously adopted version of our Housing Element and adopted this revised version. No further revisions were made to the document from the version that was submitted to and reviewed by HCD.

As required, since the housing element relies upon non-vacant sites to accommodate more than 50 percent of the Regional Housing Need Allocation (RHNA) for lower-income households, the City included findings in our resolution adopting the Housing Element that based on substantial evidence, the existing uses will not be an impediment to future housing development.

Included with this transmittal please find:

1. Adopted Housing Element 2023-2031 with Appendices A through E
 - Including Appendix B: Housing Sites Inventory on HCD Template (electronic submittal also sent to sitesinventory@hcd.ca.gov)
2. Resolution Adopting the Housing Element

Throughout the process, the City has made all versions of the Housing Element available on the City's website and provided email updates to interested parties at least seven days prior to submitting to HCD. The Planning Commission and City Council hearings for Housing Element adoption were duly noticed in compliance with State law and City procedures.

Staff appreciates the extensive support provided by HCD staff, specifically Sohab Mehmood and Andrea Grant, in providing critical feedback and guidance to assist the City in meeting the statutory requirements. They were very generous and patient with their time which was essential in getting us to this important juncture.



We look forward to receiving news of the certification of our Housing Element. Please reach out if there are any questions or missing components.

Thank you,



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City of BELMONT

2023 - 2031 Housing Element Update



Adopted by the
City of
Belmont
September 10, 2024

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INTRODUCTION

Since 1969, State law requires that jurisdictions throughout California complete a Housing Element. The City itself is not responsible for building or producing this housing, but it must demonstrate that it has policies and programs in place to support housing construction for all income levels, as well as available land appropriately zoned to accommodate new housing. The Housing Element must include a variety of statistics on housing needs, constraints to development, and policies and programs to implement a variety of housing-related land use actions, and a detailed inventory of “opportunity sites” on which future housing may be built.

The Housing Element is part of the City’s General Plan and sets forth the policies and programs to address the housing needs for Belmont. It is the City’s eight-year housing strategy from the period of 2023-2031 for how it will meet the community’s housing needs. State law (Government Code Sections 65580-65589.8) requires that every city and county in California adopt a Housing Element, subject to State approval, as part of its General Plan. Per Senate Bill (SB) 375 (Statutes of 2008), the planning period for the Housing Element is eight years. The Housing Element is the only element of a locality’s General Plan that must be approved (“certified”) by the State, through its Department of Housing and Community Development (HCD) to ensure it meets all statutory requirements. Having a certified Housing Element is a prerequisite for many state grants and funding programs.

1.1 INTRODUCTION TO BELMONT

Known for its wooded hills, views of the San Francisco Bay and stretches of open space, Belmont is a quiet residential community amid the culturally and technologically rich Bay Area. Belmont is in San Mateo County, half-way between San Francisco and San Jose. The city is within easy driving distance of the Pacific coast, three major airports, and major employment centers including San Francisco, Silicon Valley, and the East Bay. Since its incorporation in 1926, Belmont has grown from a small town of less than 1,000 residents to a community of over

1. INTRODUCTION

28,000 in 2020. Much of the city's population and housing growth occurred during the 1950s and 1960s during the post-war periods. Most of the neighborhoods are found on the hillsides with access to many open spaces and parks. There are excellent public and private schools with high test scores. The downtown has easy access to freeway and rail transportation and is a mix of small shops and other commercial uses.



Three21 @ Belmont Apartments located at 321 Oxford Way

The community is approaching build-out and has a limited amount of vacant land available for future residential development. Some small vacant residential lots exist in the hillside neighborhoods. However, there are substantial opportunities for revitalization and redevelopment of older buildings into new residential development in the downtown and along the major commercial arterials, El Camino Real, Ralston Avenue, and Old County Road.

1.2 HOUSING ELEMENT UPDATE PROCESS

The California State Legislature has identified the attainment of a decent home and suitable living environment for every Californian as a statewide goal. Local planning programs play a critical part in achieving this goal. Therefore, the Legislature mandates that all cities and counties prepare a Housing Element as part of their comprehensive General Plans (California Government Code Section 65580 et al.).

It is intended that this Housing Element be reviewed annually and updated and modified not less than every eight years to remain relevant and useful and reflect the community's changing housing needs including the state's mandated housing needs allocation. The City will annually review its progress implementing the Housing Element through Annual Progress Reports required to be submitted to the State. The City is updating its Housing Element at this time to comply with the update required of all jurisdictions in the Association of Bay Area Governments (ABAG) region, as well as to respond to the issues that currently face the City. This Housing Element update covers the planning period from January 31, 2023 through January 31, 2031, which represents the sixth cycle for the region.

1.3 LEGISLATIVE CONTEXT

Since the City's last Housing Element was adopted and certified in 2014, many pieces of housing legislation have been signed into law, resulting in substantive changes to state housing law and Housing Element requirements.

- **Affordable Housing Streamlined Approval Process: Senate Bill 35 (2017), Assembly Bill 168 (2020), and Assembly Bill 831 (2020).** SB 35 created a streamlined, ministerial review

process for qualifying multi-family, urban infill projects in jurisdictions that have failed to approve housing projects sufficient to meet their state-mandated RHNA. Among other requirements, to qualify for streamlining under SB 35, a project must incorporate one of two threshold levels of affordable housing: (1) 10 percent of the project's units in jurisdictions that have not approved housing projects sufficient to meet their RHNA for above moderate-income housing or have failed to submit an annual progress report as required under State law; or (2) 50 percent of the project's units in jurisdictions that have not approved housing projects sufficient to meet their RHNA for below moderate-income housing. AB 168 added a requirement to provide a formal notice to each California Native American tribe that is affiliated with the area of the proposed project. The Housing Element must describe the City's processing procedures related to SB 35. This is discussed further in *Chapter 4, Constraints*.

- **Additional Housing Element Sites Analysis Requirements: Assembly Bill 879 (2017) and Assembly Bill 1397 (2017).** These bills require additional analysis and justification of the sites included in the sites inventory of the City's Housing Element. The Housing Element may only count non-vacant sites included in one previous housing element inventory and vacant sites included in two previous housing elements if the sites are subject to a program that allows affordable housing by right. Additionally, the bills require additional analysis of non-vacant sites and additional analysis of infrastructure capacity, and place size restrictions on all sites.
- **Affirmatively Furthering Fair Housing: Assembly Bill 686 (2017).** AB 686 ensures that public entities, including local governments, administer their programs relating to housing and urban development in a manner affirmatively to further the purposes of the federal Fair Housing Act and do not take any action that is materially inconsistent with its obligation to affirmatively further fair housing. It also requires that housing elements of each city and county promote and affirmatively further fair housing opportunities throughout the community for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act, Government Code Section 65008, and any other state and federal fair housing and planning law. AB 686 requires jurisdictions to assess fair housing in the housing element, prepare the housing element site inventory through the lens of affirmatively furthering fair housing, and include program(s) to affirmatively further fair housing.
- **No-Net-Loss Zoning: Senate Bill 166 (2017).** SB 166 amended the No-Net-Loss rule to require that the land inventory and site identification programs in the Housing Element include sufficient sites to accommodate the unmet RHNA. When a site identified in the Housing Element as available to accommodate the lower-income portion of the RHNA is actually developed for a higher income group, the City must either (1) identify, and rezone, if necessary, an adequate substitute site or (2) demonstrate that the land inventory already contains an adequate substitute site.
- **By Right Transitional and Permanent Supportive Housing: Assembly Bill 2162 (2018) and Assembly Bill 101 (2019).** AB 2162 requires the City to change its zoning to provide a

“by right” process and expedited review for supportive housing. The bill prohibits the City from applying a conditional use permit or other discretionary review to the approval of 100 percent affordable developments that include a percentage of supportive housing units, either 25 percent or 12 units, whichever is greater. The change in the law applies to sites in zones where multi-family and mixed uses are permitted, including in nonresidential zones permitting multi-family use. Additionally, AB 101 requires that a Low Barrier Navigation Center development be a use by right in mixed-use zones and nonresidential zones permitting multi-family uses if it meets specified requirements.

- **Accessory Dwelling Units (ADUs): Assembly Bill 2299 (2016), Senate Bill 1069 (2016), Assembly Bill 494 (2017), Senate Bill 229 (2017), Assembly Bill 68 (2019), Assembly Bill 881 (2019), Assembly 587 (2019), Senate Bill 13 (2019), Assembly Bill 670 (2019), Assembly Bill 671 (2019), and Assembly Bill 3182 (2020).** In recent years, multiple bills have added requirements for local governments related to ADU ordinances. The 2016 and 2017 updates to State law included changes pertaining to the allowed size of ADUs, permitting ADUs by right in at least some areas of a jurisdiction, and limits on parking requirements related to ADUs. More recent bills reduce the time to review and approve ADU applications to 60 days, remove lot size requirements and replacement parking space requirements and require local jurisdictions to permit junior ADUs. AB 68 allows an ADU and a junior ADU to be built on a single-family lot, if certain conditions are met. The State has also removed owner-occupancy requirements for ADUs, created a tiered fee structure that charges ADUs based on their size and location, prohibits fees on units of less than 750 square feet, and permits ADUs at existing multi-family developments. AB 671 requires the Housing Element to include plans to incentivize and encourage affordable ADU rentals. AB 3182 prohibits homeowner’s associations from imposing rental restrictions on ADUs.
- **Density Bonus and Development Incentives: Assembly Bill 1763 (2019) and Assembly Bill 2345 (2020).** AB 1763 amended California’s density bonus law to authorize significant development incentives to encourage 100 percent affordable housing projects, allowing developments with 100 percent affordable housing units to receive an 80 percent density bonus from the otherwise maximum allowable density on the site. If the project is within half a mile of a major transit stop, the City may not apply any density limit to the project, and it can also receive a height increase of up to three additional stories (or 33 feet). In addition to the density bonus, qualifying projects will receive up to four regulatory concessions. Additionally, the City may not impose minimum parking requirements on projects with 100 percent affordable housing units that are dedicated to special needs or supportive housing. AB 2345 created additional density bonus incentives for affordable housing units provided in a housing development project. It also requires that the annual report include information regarding density bonuses that were granted.
- **Housing Crisis Act of 2019: Senate Bill 330 (2019).** SB 330 enacts changes to local development policies, permitting, and processes that will be in effect through January 1, 2025. SB 330 places new criteria on the application requirements and processing times for housing developments; prevents localities from decreasing the housing capacity of any site, such as through downzoning or increasing open space requirements, if such a decrease

- would preclude the jurisdiction from meeting its RHNA housing targets; prohibits localities from imposing a moratorium or similar restriction or limitation on housing development; prevents localities from establishing non-objective standards; and requires that any proposed demolition of housing units be accompanied by a project that would replace or exceed the total number of units demolished. Additionally, any demolished units that were occupied by lower-income households must be replaced with new units affordable to households with those same income levels. The City's processing procedures related to SB 330 are described further in Appendix B.
- **Surplus Land Act Amendments: Assembly Bill 1486 and AB 1255 (2019).** AB 1486 refines the Surplus Land Act to provide clarity and further enforcement to increase the supply of affordable housing. The bill requires the City to include specific information relating to surplus lands in the Housing Element and Housing Element Annual Progress Reports, and to provide a list of sites owned by the city or county that have been sold, leased, or otherwise disposed of in the prior year. AB 1255 requires the City to create a central inventory of surplus and excess public land each year. The City is required to transmit the inventory to the Department of Housing and Community Development (HCD) and to provide it to the public upon request.
 - **Housing Impact Fee Data: Assembly Bill 1483 (2019).** AB 1483 requires the City to publicly share information about zoning ordinances, development standards, fees, exactions, and affordability requirements. The City is also required to update such information within 30 days of changes. This Housing Element describes governmental constraints on the production of housing, including a look at zoning requirements, development standards, fees, exactions, and affordability requirements. Changes in requirements made during the Housing Element planning period will also be reported as part of the City's annual Housing Element Progress Report.
 - **SB 6, Beall (Chapter 667, Statutes of 2019).** Jurisdictions are required to prepare the housing site inventory on forms developed by HCD and send an electronic version with their adopted housing element to HCD. HCD will then send those inventories to the Department of General Services by December 31 of each year.
 - **Housing Opportunity and More Efficiency (HOME) Act: Senate Bill 9, Atkins (Chapter 162, Statutes of 2021).** Effective January 1, 2022, SB 9 requires the City to allow up to two residential dwelling units and residential lot splits in single-family zones. SB 9 allows for reduced standards, such as setbacks, minimum parcel dimensions, and parking. The City must apply objective zoning standards that do not preclude construction of up to two 800-square-foot units. To prevent displacement, the State does not allow SB 9 projects to demolish any affordable or rent controlled housing, or housing that has been occupied by a tenant within the last three years. Projects that meet the qualifying criteria and requirements must be ministerially approved and are not subject to CEQA review.

1.4 GENERAL PLAN CONSISTENCY

The Housing Element is the only chapter in a general plan with statutorily prescribed timelines for completion. To ensure internal consistency among all General Plan elements, the City will update its Land Use Element to be consistent with Housing Element in terms of land uses, population, and housing projections. In addition, the City will make updates to the Safety Element consistent with Gov. Code Section 65302 and 65302.5. Annually, during the preparation of the Annual Performance Report to HCD, the City will review any potential changes to other Elements of the General Plan to ensure ongoing consistency. This includes any time that General Plan updates are being proposed.

1.5 HOUSING ELEMENT ORGANIZATION

Consistent with State law, this Housing Element consists of the following major components:

1. **Introduction [Chapter 1].** Explains the purpose, process, and contents of the Housing Element.
2. **Housing Needs [Chapter 2].** Presents an analysis of population and employment trends, the city's fair share of regional housing needs, household characteristics, and the condition of the housing stock.
3. **Affirmatively Furthering Fair Housing Summary [Chapter 3].** Summarizes the Assessment of Fair Housing and explains how the City intends to proactively address affirmatively furthering fair housing (AFFH) considerations through our Housing Element programs.
4. **Constraints [Chapter 4].** Reviews governmental constraints, including land use controls, fees, and processing requirements, as well as non-governmental constraints, such as construction costs, availability of land and financing, physical environmental conditions, and units at risk of conversion, which may impede the development, preservation, and maintenance of housing.
5. **Resources [Chapter 5].** Identifies resources available for the production and maintenance of housing, and discussion of federal, state, and local financial resources and programs available to address the City's housing goals.
6. **Adequate Sites [Chapter 6].** Describes and maps the land suitable for residential development to accommodate the City's Regional Housing Needs Allocation (RHNA) and describes the anticipated development on those sites.
7. **Housing Goals, Policies, and Programs [Chapter 7].** Identifies the City's housing goals and provides policies and programs to address Belmont's housing needs.

Given the detail and lengthy analysis in developing the Housing Element, supporting background material is included in the following appendices:

- Appendix A: Housing Needs Report

- Appendix B: Sites Inventory
- Appendix C: Assessment of Fair Housing Report
- Appendix D: Review of Housing Element Past Performance Program Accomplishments
- Appendix E: Outreach

1.6 PUBLIC PARTICIPATION SUMMARY

OVERVIEW

The Housing Element is an important document that will shape the future of our community. Therefore, it is important that it reflects the vision of the people who make the City of Belmont special. To accomplish this, Belmont developed and implemented an outreach plan designed to reach as many community members who live and work here as possible. For some of the community outreach activities, Belmont partnered with other San Mateo County jurisdictions for a first-of-its-kind countywide outreach effort, through an award-winning collaboration called “21 Elements.” A summary of public participation and community outreach activities, along with key takeaways, are included below.

WEBSITE AND SOCIAL MEDIA

- Belmont developed a city website at www.belmont.gov/housingelement to host all information and resources related to the Housing Element update. The webpage hosted an archive of past Belmont Housing Elements, recordings and materials from all community engagement activities, and multiple ways for people to provide feedback, including a virtual sites map. The City’s homepage also included a banner linking visitors to the Housing Element Webpage.
- Belmont participated in and helped shape the “Let’s Talk Housing” regional housing collaboration. Let’s Talk Housing developed a countywide website available in five languages, a Belmont webpage (www.letstalkhousing.org/belmont) detailing the City’s timeline, engagement activities and resources that also linked to the Belmont website, videos about the process in several languages, and a social media presence. As of February 2022, the website has been visited more than 17,000 times, with more than 20 percent from mobile devices.
- Belmont created a dedicated e-notification list to keep interested parties informed about the Housing Element update process.
- Belmont utilized a variety of social media platforms to inform the community about the housing update process, solicit community survey responses.

COMMUNITY MEETINGS

Belmont participated in several meetings and webinars in partnership with 21 Elements, including the following.

1. INTRODUCTION

- **Introduction to the Housing Element** – A housing element overview with breakout discussion rooms that was part of a series of introductory meetings attended by more than 1,000 community members countywide.
- **All About RHNA** – A webinar offering a deep dive into the RHNA allocation process and the opportunity sites methodology.
- **Stakeholder Listening Sessions** – Four meetings where staff from all County jurisdictions could listen to and hold breakout discussions with housing stakeholder groups arranged by topic. More than 30 groups participated.
- **Creating an Affordable Future** – A four-part webinar series to help educate community members about local housing issues.

Belmont coordinated and hosted numerous public meetings to review components of the Housing Element update; all the following meetings' recordings and materials can be found on the City's Housing Element webpage.

- City Council Public Study Session (May 11, 2021) – An introduction to the Belmont Housing Element.
- City Council Public Meeting (January 11, 2022) – An update on the Housing Element and housing development activity review.
- Affirmatively Furthering Fair Housing Workshop (March 23, 2022) – A virtual community meeting to review AFFH and new Housing Element requirements.
- City Council Public Study Session (April 26, 2022) – A review of draft housing sites, AFFH assessment, and draft Housing Element programs.
- Planning Commission Public Study Session (May 17, 2022) – A review of draft housing sites, AFFH assessment, and draft Housing Element programs.
- Housing Element Community Workshop (June 27, 2022) – A highly attended virtual meeting to review the Housing Element update and the connection between housing growth and transportation, parks, and other land use planning efforts within the city.
- Planning Commission Draft Housing Element and EIR Review (July 19, 2022) – Available to attend both in-person and virtually.
- City Council Draft Housing Element and EIR Review (July 26, 2022) – Available to attend both in-person and virtually, with speech and hearing-impaired services available by request.
- Planning Commission Housing Element and EIR Review (January 17, 2023) – Recommendation to the City Council to adopt the Housing Element and certify the EIR. Available to attend both in-person and virtually, with speech and hearing-impaired services available by request.

- City Council Public Meeting Certifying the Final Programmatic EIR and adoption of the 2023-2031 Housing Element (January 30, 2023) – Available to attend both in-person and virtually, with speech and hearing-impaired services available by request.
- City Council Public Study Session (September 26, 2023) – This presentation focused on reviewing additional policies related to AFFH and provide an update on the revisions made in response to the April 2023 HCD comment letter.
- City Council Public Study Session (March 26, 2024) – This presentation focused on new Housing Mobility programs in response to HCD comments that will support more housing opportunities across the city, specifically targeting low-density neighborhoods in response to the December 2023 HCD comment letter.

OTHER OUTREACH STRATEGIES

- **Community Mailer Postcard #1** – Direct postcard mailer in March 2022 to all residential units in Belmont introducing the Housing Element update, promoting the online AFFH survey, and promoting the March AFFH Community Workshop. The postcard was also distributed at the Belmont Library and Twin Pines Senior & Community Center; invitation for comments in Spanish included.
- **AFFH Fair Housing Online Survey** – To gather insight on community needs and priorities. Survey link provided in direct postcard mailer to all residential units in Belmont, shared on social media (Facebook, NextDoor, Instagram, Twitter), City website, Citywide Weekly Update, and citywide utility bill insert mailer; survey made available in English, Spanish, simplified Chinese, Tagalog, and Vietnamese; 174 survey responses.
- **Community Mailer Postcard #2** – Direct postcard mailer to all residential units advertising where to find the draft Housing Element and Environmental Impact Review (EIR) and promoting the June community housing workshop. The postcard was also distributed at the Belmont Library and Twin Pines Senior & Community Center; invitation for comments in Spanish included.
- **Citywide Utility Bill Inserts** – The City designed and distributed an information flier with the with quarterly municipal sewer utility bill that included information about the Housing Element Update, a short URL link to the AFFH fair housing survey, housing element web address and housing email address for people to provide comments.

SPECIAL NEEDS COMMUNITY OUTREACH EFFORTS

During the Housing Element development process, Belmont made diligent efforts to engage all economic segments of the Belmont community, including special needs populations. These efforts are details above, and summarized below:

- **Belmont Senior Residents.** One of the largest special needs housing populations in Belmont are seniors, with an aging senior population, several senior living facilities located in Belmont and a robust senior community center located near Belmont City Hall. During the Housing Element development process, the City made sure that both the Fair Housing

community mailer and the Public Notice mailer were delivered to all residential tenants in Belmont. The City reached out to senior living facilities to ensure distribution of materials to residents who might not otherwise be on community or property owner mailing lists. The City made sure to provide printed materials at the Belmont Senior Center grab-and-go lunches that were extremely well attended during the COVID-19 pandemic closure of other traditional community gathering spaces.

- **Translation Services.** In order to ensure non-English speaking residents had opportunities to participate in the community engagement process, the City made sure to include both Spanish and simplified Chinese translation on printed and digital communications that invited residents to provide input on the Housing Element development process in their language of preference (see example below). Written translation services were provided by ABAG. The City of Belmont Housing Element webpage continues to include verbiage in Spanish offering residents to provide written feedback in their language of preference.
- **Resident Housing Surveys.** The City of Belmont participated in the ABAG Regional Housing Technical Assistance (RHTA) online housing survey which was made available in English, Spanish, Tagalog, Vietnamese, and simplified Chinese. Belmont also participated in a Countywide Fair Housing Survey that was available online, in both Spanish and English, in a format accessible to screen readers, and promoted through City communications and social media as well as through partner networks. A total of 2,382 residents participated, 89 were from Belmont.
- **Equity Advisory Group.** Belmont participated in an Equity Advisory Group with 21 Elements to ensure outreach was designed to meet with community stakeholders where they were at as much as possible. The Equity Advisory Group consisting of 18 organizations across San Mateo County that provided feedback on outreach and materials, and shared information about the Housing Element update and how to participate in the process with the communities they serve. Belmont has provided direct Housing Element updates, meeting invitations, and other related Housing Element development materials to various housing service providers who have been engaged with the City during the two-year process. See above for more details on the Equity Advisory Group effort and community participants.
- **Accessible City Housing Element Website.** The City created a Housing Element update website that was mobile friendly, with accessibility features and in multiple languages, recognizing that lower-income residents, young adults, and people of color are more likely to use their phones to access information about the Housing Element process.

KEY TAKEAWAYS

Below is a summary of key takeaways that emerged throughout the outreach process.

- **Housing is personal.** People often have differing views on housing because it is a very personal issue tied to feelings of safety, belonging and identity. Often the comments reflected people's current housing situation. Those with safe, stable housing that they can afford were more concerned with potential change. Those without were more interested in

- bolder policies and more housing generally. Many people shared meaningful stories of being priced out of their communities or of their children not being able to live in the community where they grew up.
- **The price of housing is a major concern.** Through surveys responses and people who spoke during community meetings, many Belmont residents voiced concerns about the high cost to rent or buy a home today, either for themselves, friends, or family. It is an issue that touches a lot of lives.
 - **More housing is needed.** Generally, participants agreed that Belmont needs more housing, particularly affordable housing. However, there are diverging views on how to accomplish this, where housing should go, and what it should look like.
 - **Single-family neighborhoods are polarizing.** While some people voiced their interest in up-zoning sites near single-family neighborhoods, a majority of Belmont homeowners want to protect single family neighborhoods and the property investments they have made.
 - **Affordable housing is a top concern.** Many felt that more needed to be done to promote affordable housing. They also felt that developers should be eligible for incentives and opportunities that make them more competitive.
 - **Better information resources.** People wanted to know how to find affordable housing in their communities and navigate the process of applying for it.
 - **Issues are connected.** Transportation, infrastructure like storms and sewer facilities, adequate park and recreation space, climate change, access to living wage jobs and education opportunities are all tied to housing and quality of life. These issues are not siloed in people's lives and there is a desire to address them in interconnected ways. The June 2022 community workshop included Belmont staff from Housing, Planning, Public Works, and Parks and Recreation to provide comprehensive information about housing growth in Belmont.
 - **Regional input matters but there's more to figure out.** It was valuable to build a broader sense of community and share resources at the countywide level. However, it was more important to this process to engage non-resident community members on jurisdiction-specific input. The City will continue to utilize some of the Housing Element engagement strategies for future community engagement efforts to insure inclusion outreach.
 - **Diversity in participation was a challenge.** Despite partnering with organizations to engage with the hardest to reach communities and providing multilingual outreach, achieving diversity in participation was challenging. In the wake of Covid-19, organizations already operating on limited resources were focused on supporting immediate needs, while the added stresses of life coupled with the digital divide added additional barriers for many.

DRAFT HOUSING ELEMENT PUBLIC REVIEW PERIODS

The City has received extensive community input over the two years related to various aspects of the Housing Element, including the CEQA review process. The City has worked diligently to respond to comments and concerns and to make adjustments to the draft document based on that input. The formal 30-day public review period of the Draft Housing Element ran from July 1, 2022 to August 1, 2022, during which 88 written comments were received. In addition, during the public review period, both the Planning Commission (July 19th) and the City Council (July 26) held public meetings to review the full draft Housing Element and received substantial public comment. During both public meetings, over 45 speakers provided comments and feedback on the plan.

Housing Element study sessions were also held by the City Council (April 26) and Planning Commission (May 17th), during which 31 written comments were received. One additional email comment was received following the AFFH community workshop held in March 2022.

On July 26, 2022, the Belmont City Council directed staff to route the draft Housing Element to the State Department of Housing and Community Development (HCD), following incorporation of the Belmont Planning Commission's recommended revisions. HCD then provided written comments to the City and in response, City staff incorporated redline revisions to the Housing Element documents.

On January 30, 2023, following the Planning Commission's recommendation, the Belmont City Council held a public hearing to certify the final Programmatic Environmental Impact Report (EIR) and adopt the 2023-2031 Housing Element. By February 1, 2023, a CEQA Notice of Determination was filed, and the Housing Element was formally submitted to HCD. On April 3, 2023, HCD provided written comments to the City which resulted in an additional revision to the draft Housing Element, including policies added to the Housing Element were reviewed by the City Council at their September 26, 2023 meeting. The revised Housing Element was submitted to HCD for review on October 19, 2023 following a 7-day public review period.

On December 18, 2023, HCD provided additional written comments to the City. Additional Housing Mobility programs added to the Housing Element were reviewed by the City Council at their March 26, 2024 meeting. A subsequent draft Housing Element was prepared in response to HCD comments which included a major re-organization and re-formatting to improve the readability of the document.

HOW WE INCORPORATED WHAT WE HEARD INTO THE PLAN

The outreach and community engagement conducted played an important role in the development of the goals, policies, and programs within the 2023-2031 Housing Element. The overarching challenge of housing affordability and availability was heard often. In addition to addressing concerns related to fair housing and ensuring compliance with new laws, and in response to the public comments made during and before the public review, multiple additional

revisions, clarifying edits, and corrections were made to prior to submittal to HCD. Those revisions and updates include the following.

- **Service Commercial Sites** — In response to significant community concerns about the proposal to rezone sites zoned Service Commercial along Old County Road to allow housing development, 20 sites were removed from the inventory resulting in a reduction of 629 housing units. Belmont officials acknowledged that housing development may still occur at these locations, but a proposed change of land use would be better analyzed by the City and community when accompanied by a specific housing development proposal.
- **Building Heights** — The City received many written and verbal comments objecting to increasing building heights in the Corridor Mixed Use (CMU) and Village Station Core (VCS) zoning districts. In response, this plan does not propose any building height increases and they are not necessary to accommodate Belmont’s RHNA allocation.
- **Special Needs Housing** — Additional data on persons with developmental or intellectual disabilities has been included, and several programs recommended by regional housing advocates are included that address concerns about ensuring housing opportunities for this special needs group, many of whom are extremely low-income.
- **BVSP Zoning** — Based on feedback from housing developers on the success of the Belmont Village Specific Plan (BVSP) zoning, which does not include a maximum density metric, similar zoning modifications were extended throughout the El Camino Real transit corridor. The Corridor Mixed Use zoning district was modified to increase the allowable floor area ratio and eliminate the maximum density metric. In response to community comments, the City also expanded the objective form-based urban design requirements from the BVSP to the CMU zoning district. These zoning code amendments were completed in January 2024.
- **Traffic and Parking** — In response to community concerns related to traffic and parking in residential neighborhoods adjacent to the priority development areas, the City hosted a community listening session on June 27, 2022 that was attended by staff from several City departments, including the Community Development Director, the Parks and Recreation Director, and the Public Works Director. The community meeting provided an opportunity for residents to share their concerns directly with City officials. The meeting also provided an opportunity for Public Works staff to provide an update on streets and roads infrastructure projects either planned or in progress.
- **Opportunity Sites** — Many of the public comments received suggested that more housing opportunity sites should be proposed in other locations in Belmont, primarily suggesting that more sites west of El Camino Real should be included on the housing sites inventory. In response to these comments, the City enhanced community outreach and information materials to better explain the site selection methodology, emphasizing that multi-family housing sites should have proximity to public transit and other resources that are found in the City’s priority development area (PDA). In addition, the draft Housing Element Environmental Impact Report (EIR) notes that vehicle miles traveled (VMT), the key metric for determining the impact of new development on traffic, is substantially lower on sites

located near transit and along major thoroughfares. Furthermore, the Housing Element includes several programs as part of the City's Fair Housing Action Plan that encourage the construction of new housing units in predominately single-family neighborhoods throughout the city.

- **Development Project Comments** — The City received a significant number of comments related to a proposed housing development located at 580 Masonic Way, a pipeline project site included on the sites inventory. The project is an allowed use under current zoning and the project application submittal is currently under review. To address concerns raised related to this project, the City created an updated project information website to distribute current and accurate project details to the community.

2

HOUSING NEEDS

The Plan Bay Area 2050 Final Blueprint¹ forecasts that the nine-county Bay Area will add 1.4 million new households between 2015 and 2050. For the eight-year timeframe covered by this Housing Element, the Department of Housing and Community Development (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 extremely low-income households to market rate housing.

Every year, the US Department of Housing and Urban Development (HUD), in conjunction with the State of California, establish income categories based on the median income in each county. Based on new requirements for the completion of the Housing Element, jurisdictions must now report on the following categories of income.

- Extremely Low-Income: 0-30% of Area Median Income, or AMI
- Very Low-Income: 30-50% AMI
- Low-Income: 50-80% AMI
- Moderate-Income: 80-120% AMI
- Above Moderate-Income: 120%+ AMI

Table 2-1 illustrates the income categories for San Mateo County in 2023. The median income for a family of four is \$175,000.

The Regional Housing Needs Determination (RHND) is based on population projections produced by the California Department of Finance (DOF) as well as adjustments that incorporate the region's existing housing need. The adjustments result from recent legislation requiring HCD to apply additional adjustment factors to the baseline growth projection from the DOF, for the regions to get closer to healthy housing markets. To this end, adjustments

¹ 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.

2. HOUSING NEEDS

TABLE 2-1: INCOME LIMITS FOR SAN MATEO COUNTY (2023)

Number of Persons in Household	1	2	3	4	5	6	7	8
San Mateo County Area Median Income: \$175,000								
Acutely Low-	\$18,400	\$21,000	\$23,650	\$26,250	\$28,350	\$30,450	\$32,550	\$34,650
Extremely Low-	\$39,150	\$44,750	\$50,350	\$55,900	\$60,400	\$64,850	\$69,350	\$73,800
Very Low-Income	\$65,250	\$74,600	\$83,900	\$93,200	\$100,700	\$108,150	\$115,600	\$123,050
Low-Income	\$104,400	\$119,300	\$134,200	\$149,100	\$161,050	\$173,000	\$184,900	\$196,850
Median-Income	\$122,500	\$140,000	\$157,500	\$175,000	\$189,000	\$203,000	\$217,000	\$231,000
Moderate-Income	\$147,000	\$168,000	\$189,000	\$210,000	\$226,800	\$243,600	\$260,400	\$277,200

Source: State of California Department of Housing and Community Development (HCD), June 6, 2023, <https://www.hcd.ca.gov/sites/default/files/docs/grants-and-funding/income-limits-2023.pdf>.

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.² These new laws governing the methodology for how HCD calculates the RHND resulted in a significantly higher number of housing units for which the Bay Area must plan compared to previous RHNA cycles.

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. The allocation that Belmont received from the Draft RHNA Methodology is broken down by income category as follows:

TABLE 2-2: FINAL REGIONAL HOUSING NEEDS ALLOCATIONS

Income Group	San Mateo			San Mateo		
	Belmont Units	County Units	Bay Area Units	Belmont Percent	County Percent	Bay Area Percent
Very Low-Income (<50% of AMI)	488	12,196	114,442	27.3%	25.6%	25.9%
Low-Income (50%-80% of AMI)	281	7,023	65,892	15.7%	14.7%	14.9%
Moderate-Income (80%-120% of AMI)	283	7,937	72,712	15.9%	16.6%	16.5%
Above Moderate-Income (>120% of AMI)	733	20,531	188,130	41.1%	43.1%	42.6%
Total	1,785	47,687	441,176	100.0%	100.0%	100.0%

Source: Association of Bay Area Governments (ABAG) Final Regional Housing Needs Allocations Plan, adopted on December 16, 2021 and approved by California Housing and Community Development on January 12, 2022.

2.1 DEMOGRAPHICS AND HOUSING NEEDS

The following are key facts regarding the city’s demographic data and housing needs and issues from the demographic report, which may be found in Appendix A.

² 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](https://www.hcd.ca.gov/community-development/housing-element/docs/abagrhna-final060920(r).pdf).

- **Population** – Generally, the population of the Bay Area continues to grow because of natural growth and because the strong economy draws new residents to the region. The population of Belmont increased by 6.7% from 2000 to 2020, which is below the growth rate of the Bay Area.
- **Age** – In 2019, Belmont’s youth population under the age of 18 was 6,233 and senior population 65 and older was 4,538. These age groups represent 23.0% and 16.7%, respectively, of Belmont’s population.
- **Race/Ethnicity** – In 2020, 53.9% of Belmont’s population was White while 1.0% was African American, 28.3% was Asian, and 12.1% was Latinx. Proportionally, Belmont has a lower overall percentage of people of color than the Bay Area as a whole (49.9%).³
- **Employment** – Belmont residents most commonly work in the *Financial & Professional Services* industry. From January 2010 to January 2021, the unemployment rate in Belmont decreased by 3.0 percentage points. Since 2010, the number of jobs located in the jurisdiction increased by 560 (9.5%). Additionally, the jobs-household ratio in Belmont has decreased from 0.75 in 2002 to 0.62 jobs per household in 2018.
- **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 Belmont increased, 0.6% from 2010 to 2020, which is *below* the growth rate for San Mateo County and *below* the growth rate of the region’s housing stock during this time period.
- **Home Prices** – A diversity of homes at all income levels creates opportunities for all Belmont residents to live and thrive in the community.
 - *Ownership* – The largest proportion of homes had a value in the range of \$1M-\$2M in 2019. Home prices increased by 123.6% from 2010 to 2020.
 - *Rental Prices* – The typical contract rent for an apartment in Belmont was \$2,250 in 2019. Rental prices increased by 76.8% from 2009 to 2019. To rent a typical apartment without cost burden, a household would need to make \$90,040 per year.⁴
- **Housing Type** – It is important to have a variety of housing types to meet the needs of a community today and in the future. In 2020, 58.0% of homes in Belmont were single family detached, 6.0% were single family attached, 3.1% were small multi-family (2-4 units), and 32.9% were medium or large multi-family (5+ units). Between 2010 and 2020, the number of single-family units increased more than multi-family units. Generally, in Belmont, the

³ 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.

⁴ Note that contract rents may differ significantly from, and often being lower than, current listing prices.

share of the housing stock that is detached single family homes is above that of other jurisdictions in the region.

- **Displacement/Gentrification** – According to research from The University of California, Berkeley, no households in Belmont live in neighborhoods that are susceptible to or experiencing displacement, and none live in areas at risk of or undergoing gentrification. 45.5% of households in Belmont live in neighborhoods where low-income households are likely excluded due to prohibitive housing costs.
- **Neighborhood** – All residents in Belmont live in neighborhoods identified as “Highest Resource” or “High Resource” areas by state-commissioned research, while none 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.⁵
- **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 Belmont, 9.0% of residents have a disability of any kind and may require accessible housing. Additionally, 5.2% of Belmont households are larger households with five or more people, who likely need larger housing units with three bedrooms or more. 6.7% of households are female-headed families, which are often at greater risk of housing insecurity.

2.2 HOUSING STOCK CHARACTERISTICS AND NEEDS

HOUSING COSTS AND COST BURDEN

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.” Low-income residents are the most impacted by high housing costs and experience the highest rates of cost burden. In Belmont, 23.6% of renters are cost burdened (spending 30% to 50% of their income on housing) compared to 12.5% of those who own. In addition, 20.7% of renters are severely cost-burdened (spending 50% or more of their income on housing), while only 7.5% of owners fall into this category. Of all households in Belmont, 15% spend 50% or more of their income on housing, while 18.1% spend 30% to 50%. However, these rates vary greatly across income

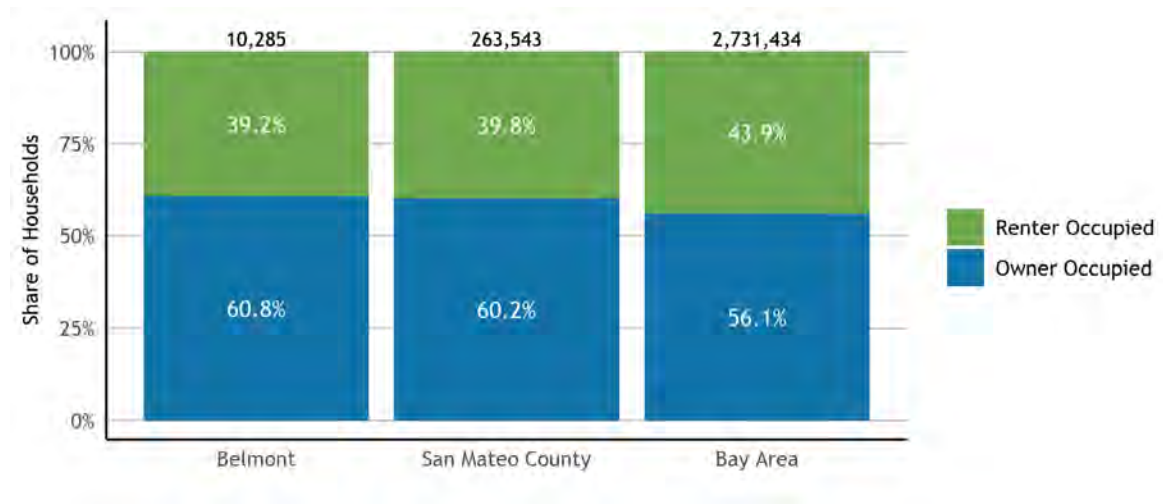
⁵ For more information on the “opportunity area” categories developed by HCD and the California Tax Credit Allocation Committee, see this website: <https://www.treasurer.ca.gov/ctcac/opportunity.asp>. The degree to which different jurisdictions and neighborhoods have access to opportunity will likely 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.

categories; for example, 76.4% of Belmont households making less than 30% of AMI spend most of their income on housing. For Belmont residents making more than 100% of AMI, just 0.3% are severely cost-burdened, and 89.9% of those making more than 100% of AMI spend less than 30% of their income on housing.

HOUSING TYPE AND TENURE

The number of residents who own their homes compared to those who rent their homes can help identify the level of housing insecurity, or the ability for individuals to stay in their homes, within a city and region. Generally, renters may be displaced more quickly if prices increase. In Belmont, there are 10,285 housing units, and fewer residents rent (39.2%) than own (60.8%). As seen in Figure 2-1, this is similar to San Mateo County, though in the Bay Area as a whole, a greater percentage rent (43.9%).

Figure 2-1: Housing Tenure



Universe: Occupied housing units.

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

For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-16.

Homeownership rates often vary considerably across race/ethnicity in the Bay Area and throughout the country. These disparities not only reflect differences in income and wealth but also stem from federal, state, and local policies that limited access to homeownership for communities of color while facilitating homebuying for White residents. While many of these policies, such as redlining, have been formally disbanded, the impacts of race-based policies are still evident across Bay Area communities. For more information on disparities in homeownership across lines of race and age, see *Appendix A: Housing Needs and Appendix C: Assessment of Fair Housing*.

In recent years, most housing produced in the region and across the state has 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 more

2. HOUSING NEEDS

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

The 2020 Belmont housing stock was made up of 58.0% single-family detached homes, 32.9% multi-family homes with five or more units, 6.0% single-family attached homes, 3.1% multi-family homes with 2 to 4 units, and 0.0% mobile homes. From 2010 to 2020, the housing type that experienced the most growth was *Single-Family Home: Detached*. In Belmont, the largest proportion of the housing stock was built from 1960 to 1979. Since 2010, 1.4% of the current housing stock has been built.

Vacant units constitute 6.5% of Belmont's overall housing stock. The rental vacancy rate stands at 10.0%, while the ownership vacancy rate is 0.8%. Of the vacant units, the most common type of vacancy is *For Rent*.

From 2015 to 2023, Belmont issued permits for 715 housing units. Of these, 71% were for above moderate-income housing, 11% were for moderate-income housing, and 18% were for low- or very low-income housing.

HOUSING CONDITION

Generally, there is limited data on the extent of substandard housing in a community; however, the Census Bureau data measuring a lack of kitchen and plumbing facilities can provide a sense of some substandard conditions that may be present in Belmont. For example, 6.6% of Belmont renters reported lacking a complete kitchen and 0.3% of renters lacked complete plumbing, compared to 0.6% of owners who lack a complete kitchen and 0.0% of owners who lacked complete plumbing. Another measure of housing condition is the age of housing. In general, the older the unit, the greater it can be assumed to need some level of rehabilitation. A general rule in the housing industry is that structures older than 20 years begin to show signs of deterioration and require renovation to maintain their quality. Unless properly maintained, homes older than 50 years can pose health, safety, and welfare problems for occupants. Based on the age of the housing stock, it is estimated that there are approximately 1,311 units in need of some level of rehabilitation in Belmont, representing 12% of the housing stock. It is estimated that nearly all units in need of rehabilitation can be repaired without replacement.

As part of this update, Belmont will establish partnerships with organizations that provide home repairs and energy-efficiency improvements for low-income households (see Program H2.4).

2.3 SPECIAL NEEDS POPULATIONS

This section includes an analysis of Belmont's housing for special needs populations, including large households, female-headed households, seniors, people with disabilities, homeless farmworkers, non-English speakers, and extremely low-income households. To address special

needs housing, the City has included the following programs in *Chapter 7, Housing Goals, Policies, and Programs*:

- Amend the zoning code to define be consistent with state law regulating farmworker housing (Program H4.2).
- Modify the Inclusionary Housing Program to provide pathways for the construction of affordable units that address the needs of residents with extremely low and very low incomes who face very high rates of cost burden in the city (Program H5.3).
- Establish a grant or loan program to incentivize homeowners to construct ADUs affordable to lower income households (targeting special needs populations such as seniors, persons with disabilities, and large households) (Program H5.10).
- Identify areas of the city with the highest potential for the addition of ADUs and JADUs due to sloping lots that create underfloor area prime for conversion to living area. Conduct direct outreach to those property owners and provide technical assistance (targeting special needs populations such as seniors, developmentally disabled persons, and large households) (Program H5.11).

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 that rent could end up living in overcrowded conditions. In Belmont, for large households with five or more people, most units (65.2%) are owner-occupied. In 2017, 13.8% of large households were very low-income, earning less than 50% of the area median income (AMI). In addition to overcrowding, large households also often have a cost burden. In Belmont, most large households that are paying too much for housing are lower-income households. Although this is primarily because there are very few large renter households, there are disproportionately fewer large renter households than large owner-occupied households. Large families are generally served by housing units with three or more bedrooms, of which there are 6,175 units in Belmont. Among these large units with three or more bedrooms, 10.8% are renter-occupied while 89.2% are owner occupied.

FEMALE-HEADED HOUSEHOLDS

Households headed by one person are often at a greater risk of housing insecurity. This is particularly true of female-headed households, where the female may be supporting children or other family with a single income. In Belmont, the largest proportion of households is Married-couple Family Households (61.8%), while Female-Headed Households make up 6.7% of households.

Female-headed households with children may face elevated 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 Belmont, 5.3% of female-headed households with children fall below the Federal Poverty Line, while 2.0% of female-

2. HOUSING NEEDS

headed households without children live in poverty. The 2015-2019 American Community Survey showed that single parents comprised approximately 9.7% of Belmont households. Of these, the vast majority were female-headed, single-parent households (68.3% of single-parent households). Female-headed families have a higher incidence of poverty when compared to all households and are more likely renters than owners. Of the female headed households in Belmont, 57.6% were renters.

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 reduced mobility. Seniors who rent may be at an 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 up 0%-30% of AMI, while the largest proportion of senior households who are homeowners falls in the income group Greater than 100% of AMI. Approximately 27.3% of households in Belmont are senior households. While many earn incomes over 100% of median income, 51% earns incomes less than 80% of median. Cost burden is prevalent amongst elderly households, especially those earning the lowest incomes. For example, although extremely low-income senior households represent 21% of total senior households, they represent more than 49.5% of senior households with a cost burden. Of all senior households, 15.8% are cost-burdened, and 22.9% are severely cost-burdened.

PEOPLE WITH DISABILITIES

People with disabilities face additional housing challenges. Encompassing a broad group of individuals living with a variety of physical, cognitive, and sensory impairments, many people with disabilities live on fixed incomes and need specialized care, yet often rely on family members for assistance due to the high cost of care. In Belmont, 9% of people have a disability of any kind. In Belmont and elsewhere, persons with disabilities have a wide range of different housing needs, which vary depending on the type and severity of the disability as well as personal preference and lifestyle. Physical, mental, and/or developmental disabilities may prevent a person from working, restrict one's mobility, or make it difficult to care for oneself.

HOMELESSNESS

Homelessness remains an urgent challenge in many communities across the state, reflecting a range of social, economic, and psychological factors. Homelessness is disproportionately experienced by people of color, people with disabilities, those struggling with addiction, and those dealing with traumatic life circumstances. The San Mateo County Human Services Agency (HSA), in close collaboration with community partners, conducts the bi-annual One Day Homeless Count and Survey (count). The purpose of the count is to gather and analyze information to help the community understand homelessness in the County.

The 2022 One Day Homeless Count and Survey counted found 13 unsheltered individuals in the City of Belmont. This was an increase from 2019, when seven homeless individuals were located, but lower than in 2013, when 43 people were counted. For more information, see <https://www.smcgov.org/hsa/2022-one-day-homeless-count>.

The County of San Mateo is the primary coordinator of services for people experiencing homelessness in the County. The City of Belmont will continue to provide support for strategic initiatives to help address the challenges faced by people experiencing homelessness in the city, as well as to support the implementation of the County's 2022-2025 Continuum of Care (COC) Strategic Plan on Homelessness.

FARMWORKERS

Farmworkers are traditionally defined as persons whose primary incomes are earned through seasonal or permanent agricultural work. Farmworkers have special housing needs because they earn lower incomes than many other workers. In many parts of Northern California, agriculture production is an important contribution to local economies, especially in Napa and Sonoma Counties. In Belmont, there are no known farmworkers, and it does not have any farm housing or land remaining in agricultural use. Furthermore, no land within Belmont is designated for agricultural use. According to American Community Survey's 2019 five-year data, there could be an estimated 30 farmworkers in Belmont; however, the margin of error for this figure is +/- 42, indicating this information is unreliable. Even at 30 farmworkers, this represents only 0.1% of the total population in the city. Due to the low number of potential agricultural workers in the city, the housing needs of migrant and/or farmworker housing need can be met through general affordable housing programs. As there are no known farmworkers in Belmont, there were no reported students of migrant workers in the 2019-20 school year.

NON-ENGLISH SPEAKERS

California has long been an immigration gateway to the U.S., which means 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 U.S. to have limited English proficiency. In Belmont, 3.6% of residents five years and older identify as speaking English "not well" or "not at all," which is below the percentage in San Mateo County. The City provides an option on its website that allows it to be translated into other languages. In addition, the City is making an enhanced effort to provide translations on public notices that are sent via mail.

EXTREMELY LOW-INCOME HOUSEHOLDS

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. In Belmont, 59.5% of households make more than 100% of the Area Median Income (AMI), compared to 11.1% making less than 30% of AMI, which is considered extremely low-income.

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

State law requires jurisdictions to estimate the number of extremely low-income households—those earning less than 30% of median income.

Extremely low-income (ELI) households are more likely to experience housing problems and cost burden. In Belmont, 11.1% of households are ELI. These households make up 5.9% of owners and 12.6% of renters. ELI renter and ELI owner households experience about the same level of cost burden 70.7% and 70.8%, respectively of their income going towards housing costs.

While White households make up the bulk of the ELI households (61.2%), many households of color also earn extremely low incomes. For example, Asian/Pacific Islander households make up 15.7% of extremely low-income households in Belmont, while Hispanic/Latinx make up 12.7% (while only representing 8.7% of the total population). Racial/ethnic, income, and housing problem demographics are further described in *Appendix D, Assessment of Fair Housing*, of this Housing Element.

2.4 UNITS AT RISK OF CONVERSION TO MARKET RATE

State law requires that each city provide analysis and programs for preserving existing affordable housing units that were developed with public subsidies. Units at risk of conversion are those units in which the restrictions, agreements, or contracts to maintain the affordability of the units expire or are otherwise terminated. At expiration, units may revert to market rate, rendering them no longer affordable to the people living in them. Loss of affordability can occur at the termination of bond funding, the expiration of density bonuses, and other similar local programs.

The potential loss of existing affordable housing units is an important issue to the City due to displacement of lower-income tenants and the limited alternative housing for such persons. It is typically less expensive to preserve the affordability of these units than to subsidize construction of new affordable units due to the inflation of land and construction costs which has occurred since the original development of the affordable housing projects.

The Housing Element includes Program H2.1, Support Retention of Existing Lower-Income Units, which directs the City to continue annually monitoring all units potentially at risk of conversion to market rate

CITY OF BELMONT BELOW-MARKET RATE AND PUBLICLY-ASSISTED HOUSING

Table 2-3 inventories existing below-market rate and publicly-assisted housing units in the City of Belmont in 2023. Assistance to help low-income households afford housing is also

TABLE 2-3: BELOW-MARKET RATE AND PUBLICLY ASSISTED HOUSING UNITS (2023)

Project Name and Address	Building Type	Total Units	Affordable Units	Property Owner	Household Type	Funding Source	Expiration Date
Bonnie Brae Terrace (formerly Lesley Terrace), 2400 Carlmont Dr	Apartment	164	164	Bonnie Brae Terrace, LP	All lower-income groups; Disabled; Seniors	Section 8 (60 units); Program 236 (104 units)	Section 8 2039; others 2031
Horizons, 825 Old County Rd	Apartment	24	24	MidPen Housing	Very low-income Families; Disabled	Section 8; City Housing Successor Loan; Program 202/162	2039
Belmont House, 730 El Camino Real	Group Home	6	6	City of Belmont	Low-income Disabled	City RDA; City Housing Successor	No expiration; City-owned property
Waltermire Apts, 631 Waltermire St	Apartment	10	2	Waltermire St Partners LP	Moderate-income Families	City RDA	2039
Belmont Apts, 800 F Street	Apartment	24	24	Mental Health Association of SMC	Very Low-income Disabled	City RDA; HOME;	2058
Crestview Group Home, 503 Crestview	Group Home	6	6	City of Belmont	Low- and moderate-income Disabled	County CDBG & State deferred loan;	No expiration; City-owned property
Firehouse Square, 1300 El Camino Real	Apartment	66	65	City of Belmont	All lower-income groups;	AHF, County, City, TCAC	2090
Emmett House, 1000 O'Neill	Duplex	2	2	City of Belmont	Moderate income	City RDA	No expiration; City-owned property
Hiller Street Group Home, 803 Hiller St	Group Home	6	6	Family Housing and Adult Resources, Inc.	Very Low-income, disabled	County CDBG deferred loan	Expiration date N/A
North Road Group Home, 901 North Rd	Group Home	8	8	Family Housing and Adult Resources, Inc.	Very Low-income, disabled	County CDBG deferred loan	Expiration date N/A
Sterling Point Ownership BMR, 935 Old County Rd	Townhomes	48	7	Individually owned units	Moderate-income First-time home buyers	City RDA	2039, 2041, 2041, 2041, 2042, 2042, 2042
25 Oxford Place	Single-Family Detached	1	1	Individually owned unit	Moderate-income families	City RDA	2030
41 Oxford Place	Single-Family Detached	1	1	Individually owned unit	Moderate-income families	City RDA	2030
TOTAL		366	316				

City of Belmont, 2024.

2. HOUSING NEEDS

available through the Housing Authority of the County of San Mateo's Section 8 Housing Choice Voucher program which can be used to access units in buildings that are not restricted as below market rate. Based on information from the City's records, there are a total of 106 units that are potentially at risk of conversion, which includes 104 units located in the Bonnie Brae Terrace complex and two single family properties.

Of the remaining units, all are considered at low-medium risk of conversion to market rate. Preservation of at-risk projects can be achieved in a variety of ways, with adequate funding availability. Alternatively, units that are converted to market rate may be replaced with new assisted multi-family units with specified affordability timeframes.

RENTAL ASSISTANCE

State, local, or other funding sources can be used to provide rental subsidies to maintain the affordability of at-risk projects. These subsidies can be structured to mirror the Housing Choice Voucher/Section 8 program, whereby the subsidy covers the cost of the unit above what is determined to be affordable for the tenant's household income (including a utility allowance) up to the fair market value of the apartment. The total annual subsidy to maintain at-risk units is estimated at about \$20,000 per unit.

TRANSFER OF OWNERSHIP

If the current organizations managing the units at risk are no longer able to maintain a project, transferring ownership of the affordable units to a nonprofit housing organization is a viable way to preserve affordable housing for the long term. The estimated market value for affordable units that are potentially at high risk of converting to market rate is likely \$350,000 per unit.

CONSTRUCTION OF REPLACEMENT UNITS

The construction of new low-income housing can be a means to replace at-risk units, though extremely costly. The cost of developing new housing depends on a variety of factors including density, size of units, construction quality and type, location, land and development costs. Using the Turner Center's research on the cost to develop affordable housing around the Bay Area, the cost to replace any units could be as much as \$700,00 per unit.

ENTITIES INTERESTED IN PARTICIPATING IN CALIFORNIA'S FIRST RIGHT OF REFUSAL PROGRAM

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

restrictions, the owner must first give notice of the opportunity to offer to purchase to a list of qualified entities provided to the owner.

HCD has identified the following six entities that may be interested in participating in California's First Right of Refusal Program in San Mateo County.

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

Of these entities, some have worked specifically in Belmont, and others have completed projects in surrounding areas. If a development becomes at risk of conversion to market-rate housing, the City will maintain contact with local organizations and housing providers who may have an interest in acquiring at-risk units and will assist other organizations in applying for funding to acquire at-risk units.

FUNDING SOURCES

A critical component to implementing any of these preservation options is the availability of adequate funding, which can be difficult to secure. In general, Low-Income Housing Tax Credit funding is not readily available for rehabilitation and preservation, as the grant application process is highly competitive and prioritizes new construction. The City's previous ongoing funding source, Low/Moderate Housing Funds available through the Redevelopment Agency, no longer exists due to the dissolution of the Redevelopment Agency more than a decade ago. However, affordable housing impact fees and inclusionary zoning in-lieu fees are a new and successful local funding source. Additional available funding sources that can support affordable housing preservation include sources from the federal and state governments, as well as local and regional funding.

Federal Funding

- HOME Investment Partnerships (HOME) Program
- Project-Based Vouchers (Section 8)
- Section 811 Project Rental Assistance
- Veterans Affairs Supportive Housing (VASH) Vouchers

State Funding

- Affordable Housing and Sustainable Communities (AHSC) Program
- Golden State Acquisition Fund (GSAF)
- Project Homekey
- Housing for a Healthy California (HHC)
- Multi-Family Housing Program (MHP)
- National Housing Trust Fund
- Predevelopment Loan Program (PDLP)

2. HOUSING NEEDS

- Permanent Location Housing Allocation (PLHA)

Regional, Local, and Nonprofit Funding

- San Mateo County Affordable Housing Fund
- Housing Successor Agency for the Redevelopment Agency
- Commercial Linkage Fee (CLF)
- City Affordable Housing Fund (LMI)
- City Inclusionary Housing Fund

3

AFFIRMATIVELY FURTHERING FAIR HOUSING SUMMARY

California Assembly Bill (AB) 686, which was signed into law in 2018 requires that all public agencies in the state affirmatively further fair housing (AFFH) beginning January 1, 2019. Public agencies receiving funding from the U.S. Department of Housing and Urban Development (HUD) are also required to demonstrate their commitment to AFFH. The federal obligation stems from the fair housing component of the federal Civil Rights Act mandating federal fund recipients to take “meaningful actions” to address segregation and related barriers to fair housing choice.

AB 686 requires all public agencies to “administer programs and activities relating to housing and community development in a manner that affirmatively furthers fair housing, and take no action inconsistent with this obligation”.¹

AB 686 also makes changes to Housing Element Law to incorporate requirements to AFFH as part of the housing element and general plan to include an analysis of fair housing outreach and capacity, integration and segregation, access to opportunity, disparate housing needs, and current fair housing practices.

¹ California Department of Housing and Community Development Guidance, 2021, page 9.

3.1 HISTORY OF SEGREGATION IN THE REGION

The United States' oldest cities have a history of mandating segregated living patterns—and Northern California cities are no exception. ABAG, in its recent Fair Housing Equity Assessment, attributes segregation in the Bay Area to historically discriminatory practices—highlighting redlining and discriminatory mortgage approvals—as well as structural inequities in society, and self-segregation (i.e., preferences to live near similar people).

Researcher Richard Rothstein's 2017 book *The Color of Law: A Forgotten History of How Our Government Segregated America* chronicles how the public sector contributed to the segregation that exists today. Rothstein highlights several significant developments in the Bay Area region that played a large role in where the region's non-White residents settled.

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 most people of color lived, from its mortgage loan program.

According to the San Mateo County Historical Association, San Mateo County's early African American residents worked in a variety of industries, from logging, to agriculture, to restaurants and entertainment. Expansion of jobs, particularly related to shipbuilding during and after World War II attracted many new residents into the Peninsula, including the first sizable migration of African Americans. Enforcement of racial covenants after the war forced African American residents 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. As a result of these practices, the African American population today is very low in both Belmont (2.1%) and San Mateo County (2.7%).

3.2 BELMONT'S FAIR HOUSING ASSESSMENT

The Fair Housing Assessment (Appendix C) follows the April 2021 State of California State Guidance for AFFH. The study was conducted as part of the 21 Elements process, which facilitates the completion of Housing Elements for all San Mateo County jurisdictions. It includes the following sections.

PRIMARY FINDINGS

Primary findings from the Fair Housing Assessment for the City of Belmont describes 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.

- **From 2017 to 2021, nine fair housing inquiries and two fair housing complaints were made by Belmont residents.** A complaint filed in 2017 concerned refusal to rent based on

national origin; it was settled through a conciliation agreement. A 2021 complaint based on disability for failure to make reasonable accommodations was withdrawn by the complainant.

- Fifty-four percent of Belmont’s population is Non-Hispanic White, 28% is Asian, 12% is Hispanic/Latinx, and 4% is other races or mixed race. **Belmont has proportionately fewer residents of color than in the County and the Bay area overall**, although the city’s Asian population is on par with the proportion in the county and Bay area.
- **Belmont has grown more racially and ethnically diverse since 2000 and 2010**, largely due to growth in Asian residents (mostly occurring between 2010 and 2020) and a slight increase in Hispanic/Latinx residents (mostly between 2000 and 2010).
- **Racial and ethnic minority populations in Belmont—except for Asians—are more likely to be living in poverty and be housing cost burdened compared to the non-Hispanic White population.** They are also slightly more likely to be denied a mortgage loan.
- Although **Asian residents** are less likely than other residents to experience cost burden, they **have relatively high rates of overcrowding**, suggesting that some are doubling up to afford to live in Belmont.
 - One-third of Non-Hispanic White households are cost burdened, with 15% severely cost burdened. Only 2.8% live in overcrowded conditions.
 - One-quarter of Asian households are cost burdened with only 9% severely burdened. Yet 7.8% live in overcrowded conditions.
 - Hispanic/Latinx households have much higher rates of cost burden—48% are burdened and 25% severely burdened—and one in ten lives in an overcrowded household.
- **Nearly all of Belmont’s households earning 30% of AMI and less are cost burdened**, with the vast majority severely burdened. The level of burden diminishes greatly once households earn 80% of AMI and more.
- According to TCAC’s educational opportunity map, **all census tracts in Belmont have schools with the most positive educational outcomes.** Belmont offers a strong educational environment citywide. Students with disabilities in the Belmont-Redwood Shores district score comparatively well compared to students with disabilities in other districts.
- **Yet educational outcomes still vary for some racial and ethnic groups**, and the school district could improve proficiency gaps and differences in suspension rates. Specifically, 82% of students in Belmont’s district meet or exceed English language arts and literacy standards; 79% exceed math standards; both are higher than the county overall. These outcomes are much lower for some students of color: 44% of Black or African American students and 64% of Hispanic students meet or exceed state English language arts standards, and 37% of Black or African American students and 52% of Hispanic students meet or exceed state math standards.

- **Suspensions are disproportionately high for Hispanic students.** Hispanic students make up 34% of the high school district student body yet account for 66% of suspensions.
- **Belmont’s largest challenge lies in housing affordability.** In two census tracts, between 40% and 60% of renter households face housing burden. Yet compared to surrounding cities, Belmont offers better rental affordability, according to the HCD Location Affordability Index. Just 18% of Belmont’s owner-occupied units are priced below \$1 million, compared to 44% for the county and 65% for the Bay area overall.
- **Belmont has not kept up with demand for new housing.** The number of homes in Belmont increased by 4% from 2010 to 2020, much improved from the prior decade where housing units increased by just 1%. Yet production still lags demand, especially for affordable housing. Between 2010 and 2020, Belmont built more single family than multi-family homes, and the city’s share of housing stock comprised of single family detached homes is above that of other jurisdictions in the region.
- Nine percent of Belmont’s residents have a disability, which is on par with the county and the Bay Area overall.
- **Belmont does not currently have a pattern of segregation or clustering based on race unlike nearby cities.** The Racial Dot Map (Figure 3-1) provides a visual demonstration of the spatial distribution of residents based on race in Belmont while Figure 3-2 includes the surrounding area for context.
- **Geospatially, lower-income residents are distributed throughout the city, without strong patterns of clustering.** The Income Dot Map (Figure 3-3) shows that Belmont has a distribution of all income groups with a slight concentration of above-moderate income residents in the northwest portion of the city.

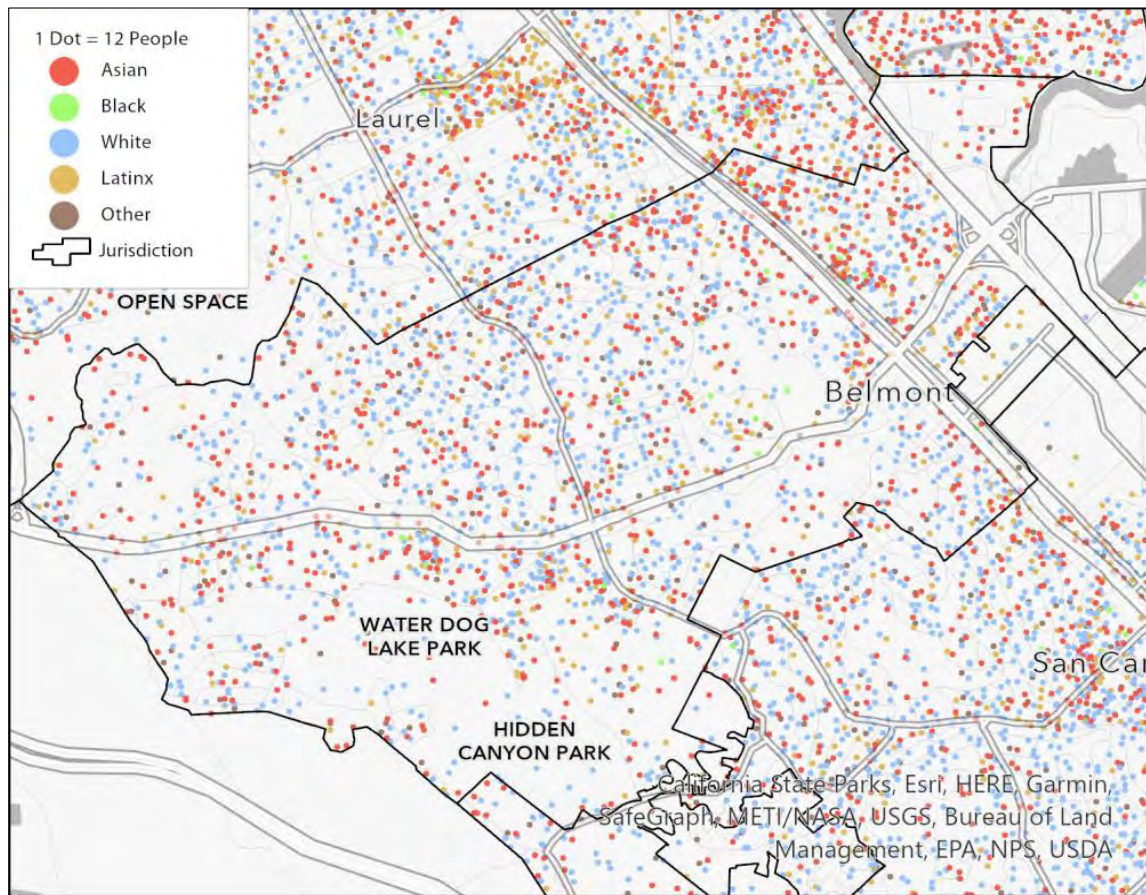
3.3 FAIR HOUSING CHALLENGES AND CONTRIBUTING FACTORS

Belmont is characterized by high-resourced neighborhoods, where residents have good access to employment opportunities and strong educational outcomes and live in environmentally healthy areas. In comparison to the Bay Area and surrounding jurisdictions, Belmont does not have a concentration of low-income household in lower resourced neighborhoods. Belmont struggles, however, to provide the housing and affordability needed by low- and moderate-income households. As such, Belmont households who cannot afford housing are significantly cost burdened and some live in overcrowded conditions.

The fair housing issues—and the factors contributing to those issues—identified by the research conducted for this AFFH include the following.

- **Few residents file fair housing complaints, indicating a potential lack of awareness about fair housing rights.** Contributing factors include lack of access to information about fair housing rights and limited knowledge of fair housing by residents.

Figure 3-1: Racial Dot Map of Belmont (2020)



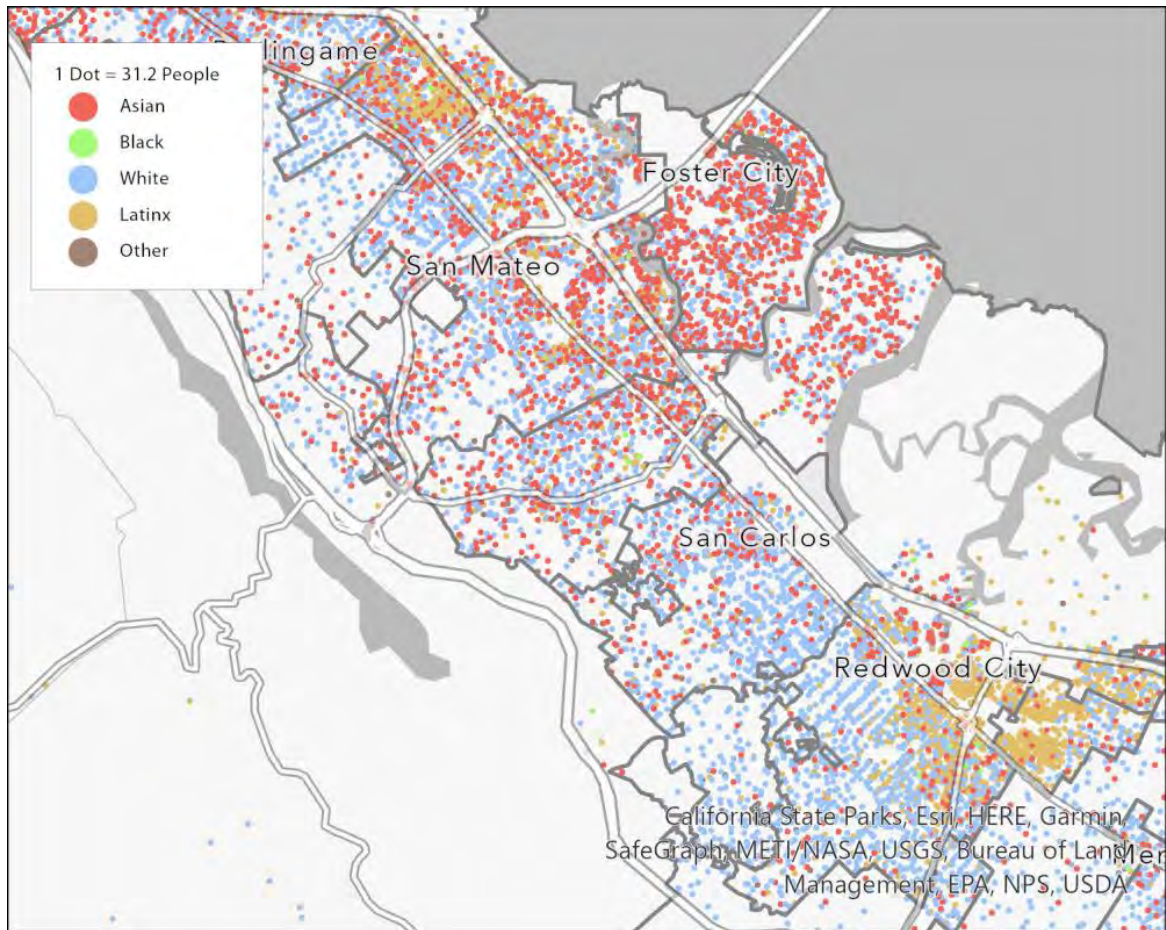
Universe: Population.

Note: The plot shows the racial distribution at the census block level for City of Belmont and vicinity. Dots in each census block are randomly placed and should not be construed as actual placement of people.

Source: U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002.

- Other than Asian residents, **Belmont has proportionately fewer residents of color than in the county and the Bay area overall.** Contributing factors include lack of affordable housing and low housing production.
- Persons of color are highly cost burdened and/or live in overcrowded housing conditions. Households with incomes of less than 80% AMI face very high levels of burden, with 93% of extremely low-income households facing burden and 79% of 31-50% AMI households facing burden. Contributing factors include lack of affordable housing, lack of a range of housing types, lower incomes of persons of color, and low housing production.
- Access to quality educational institutions is strong, but students of color still face disparities in subject proficiency within schools. Overall, 82% of students in Belmont's district meet or exceed English language arts and literacy standards and 79% exceed math standards. For Black or African American students, however, 44% are English language arts and literacy proficient and 37% are math proficient. For Hispanic students, 64% are English language arts and literacy proficient and 52% are math proficient.

Figure 3-2: Racial Dot Map of Belmont and Surrounding Areas (2020)

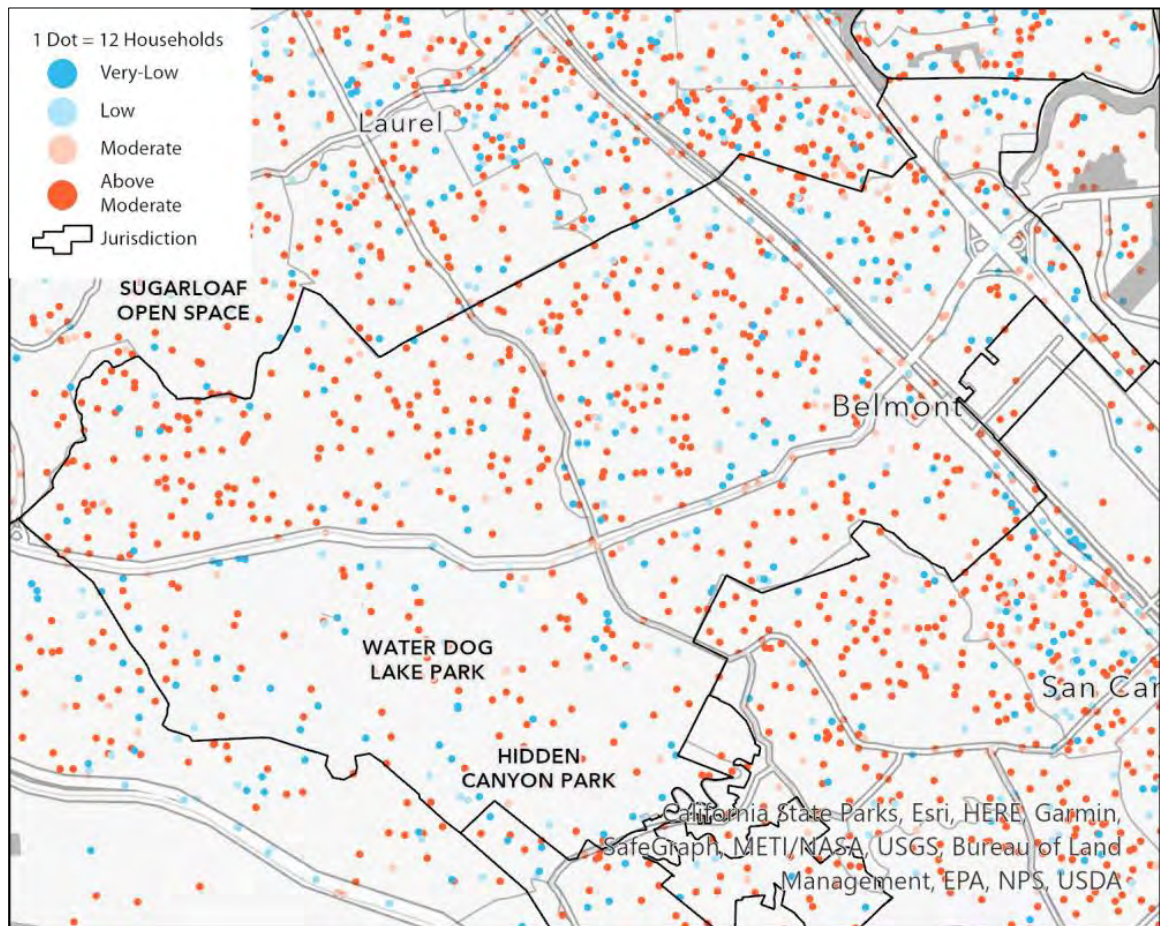


Universe: Population.

Note: The plot shows the racial distribution at the census block level for City of Belmont and vicinity. Dots in each census block are randomly placed and should not be construed as actual placement of people.

Source: U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002.

- **Hispanic students face high rates of suspension compared to their representation among student bodies.** The reason for these disparities is unclear and should be examined. The gaps suggest that Black and African American and Hispanic students need greater support to succeed, and that schools in the Belmont area need to focus more closely on efforts to close proficiency gaps and ensure equity in education.
- **Local Fair Housing Issues.** As discussed in a residents' survey, some Belmont residents do feel they were discriminated against. Actions taken after the discrimination include: doing nothing for fear of harassment or eviction (50%) or did not report the event because they were unsure what to do (38%). For Belmont, it is important to take note of the large volume of respondents who did not report the incidence due to lack of information on reporting discrimination. These results suggest that there is a lack of fair housing information being provided to city residents on housing rights and how/where to file a housing discrimination complaint.

Figure 3-3: Income Dot Map of Belmont (2015)

Universe: Population.

Note: The plot shows the income group distribution at the census block group level for City of Belmont and vicinity. Dots in each block group are randomly placed and should not be construed as actual placement of individuals.

Source: U.S. Department of Housing and Urban Development (HUD), American Community Survey 5-Year 2011-2015 Low- and Moderate- Income Summary Data.

Residents have also been denied housing while looking for rentals or homes. Overall, 62% of respondents living in Belmont had looked for housing to rent or buy in the past five years. Of those who had looked for housing to rent or buy, 52% were denied housing. The top reasons for denial are listed below distinguished by prospective renters and homebuyers.

For Belmont respondents looking for rental housing, top reasons for denial include the following:

- 33% reported that the landlord did not return their calls or emails asking about the unit;
- 27% had been told by a landlord that the unit was available but when they showed up in person the unit was no longer available; and
- 27% were denied because another renter/applicant was willing to pay more in rent.

3. AFFIRMATIVELY FURTHERING FAIR HOUSING SUMMARY

Reasons for denial among those seeking to buy a home include the following:

- 35% responded “none of the above;”
- 21% had a real estate agent that told them they would need to show that they were prequalified with a bank; and
- 15% perceived that they were only shown homes in neighborhoods where most people were of the same race/ethnicity.

For both renters and homebuyers, denial reasons include the following:

- 38% were denied housing because their income was too low; and
- 27% reported that they haven’t established credit history or have no credit history.

An additional fair housing obstacle for Belmont is local opposition to the City’s plan to create more housing. This is a fair housing issue as opposition can hinder Belmont’s ability to provide equal opportunity to access housing among protected classes. During the community outreach process for the Housing Element, residents in the Sterling Downs, Homeview, and El Camino neighborhoods expressed concern about the concentration of the housing development opportunity sites in their neighborhoods due to its potential impact on neighborhood character and traffic congestion. The city is zoned for higher-density multi-family housing projects in this area because of its proximity to public transit and commercial retail services. In response to these concerns, staff worked with the residents of the community on revisions to the housing development opportunity sites and ultimately received their support for the adopted January 2023 Housing Element.

3.4 FAIR HOUSING ACTION PLAN

The Fair Housing Action Plan was developed in response to the letter and spirit of the law, this analysis, and community input. Geospatially, Belmont residents are relatively well distributed throughout the community based on race and income as demonstrated in Figures 3-1 and 3-3.

The housing mobility programs (referenced in Table 3-1 below) build on that pattern of distribution and enhance it through intentional programs to increase the variety of housing types throughout the city and address identified fair housing issues. These approaches will affirmatively further fair housing and foster an inclusive community by: 1) Encouraging additional units spread throughout existing single-family neighborhoods; 2) Creating more small units to provide options to highly cost burdened people of color; and 3) Allowing larger ADUs and SBg units on lots 10,000 square feet or larger to better accommodate households living in overcrowded conditions.

Another housing mobility opportunity lies in religious institutions and private schools that are well distributed throughout the city. These land uses often have underutilized areas of their properties where additional units may be possible. One of the local churches has been in touch with staff to inquire about potential development. The City will conduct direct outreach to

these institutions and provide technical assistance through *Program H5.8* (See *Chapter 7 Housing Goals, Policies, and Programs*).

Taken together, these policies will create new housing opportunities throughout the community. Figure 3-4 shows the distribution of lots 10,000 square feet or greater, where larger ADUs and SB9 units will be located; religious institutions and schools; existing multi-family housing sites; and Housing Inventory Sites in this Housing Element.

Table 3-1 below summarizes the fair housing issues, contributing factors, and implementation programs to affirmatively further fair housing in Belmont. Contributing factors are prioritized on whether they most limit or deny fair housing choice or access to opportunity or negatively impact fair housing or civil rights compliance.

Figure 3-4: Visualization of Housing Mobility Programs and Existing Multi-Family

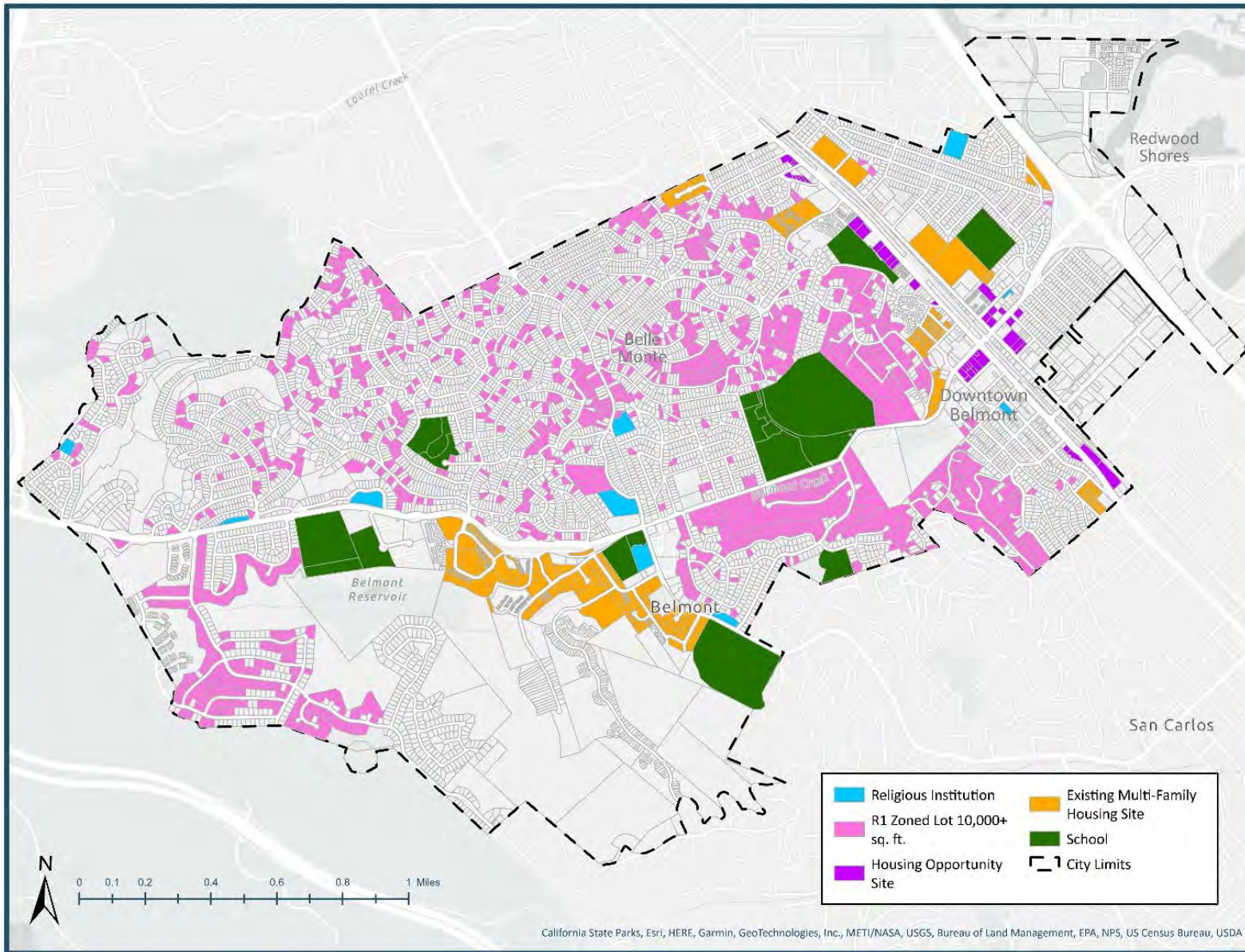


TABLE 3-1: FAIR HOUSING ACTION PLAN

Fair Housing Issue	Contributing Factors	Priority Level	Meaningful Program Actions (from <i>Chapter 7, Goals, Policies, and Programs</i>)	Targets and Timeline
Lack of fair housing complaints filed.	Lack of access to information about fair housing rights. Limited knowledge of fair housing by residents.	High	<ul style="list-style-type: none"> ▪ H5.1: Update Website to Improve Access to Fair Housing Information and Housing Services. 	<ul style="list-style-type: none"> ▪ Complete best practices review by Q1 2025. ▪ Complete website update by Q2 2025, update quarterly thereafter.
Very high rates of cost burden for <50% AMI households and Black and Hispanic households; high rates of overcrowding among Asian households.	Lack of affordable housing citywide; low housing production.	High	<ul style="list-style-type: none"> ▪ H5.2: Coordinate with other jurisdictions and agencies in the County to advance AFFH goals ▪ H5.3: Modify the Inclusionary Housing Program. ▪ H5.4: Work with Housing Developers to Affirmatively Market Housing to Households with Disproportionate Housing Needs. ▪ H5.6: Expand Tenant Protections ▪ H5.7: Continue Financial Support of Existing Home Sharing Program. 	<ul style="list-style-type: none"> ▪ Attend regular meetings with 21 Elements, 21 Directors and Housing Managers group. Collaborate with peer jurisdictions to implement Housing Element Programs that would benefit from efficiencies of scale. ▪ Complete feasibility analysis by Q4 2025; Implement redesigned program by Q1 2026. ▪ Establish list of service providers by Q4 2024 and update annually thereafter. ▪ Ongoing as projects are processed, review developer marketing plans to ensure affirmative marketing is included. ▪ In Q4 2025, draft extended tenant protections provisions and research policy provisions for substantial remodel exemptions and right of return policies. ▪ Bring recommended language to City Council in Q1 2026. Conduct proactive outreach to tenants and tenant groups bi-annually. ▪ City will grant funding as part of annual budget process. ▪ Meet with HIP Housing within one year of Housing Element Certification and annually thereafter.

3. AFFIRMATIVELY FURTHERING FAIR HOUSING SUMMARY

Fair Housing Issue	Contributing Factors	Priority Level	Meaningful Program Actions (from <i>Chapter 7, Goals, Policies, and Programs</i>)	Targets and Timeline
			<ul style="list-style-type: none"> ▪ H5.8: Facilitate Development of Housing on Institutional Properties. ▪ H5.9: Amend Zoning Code to Facilitate Production of ADUs and SB9 units. ▪ H5.10: Provide Financial Support for ADUs that Serve Lower-Income Households. ▪ H5.11: Conduct Outreach to Encourage ADU and SB9 Unit Production. ▪ H5.12: Create an AFFH Monitoring Program. 	<ul style="list-style-type: none"> ▪ Reach out to each religious institution site owner or operator within one year following Housing Element certification and annually thereafter. ▪ Provide mailed notifications to religious institutions within six months of the adoption of any new State legislation that reduces barriers to development of religious institution sites. ▪ Reach out to each private school site owner or operator within one year following Housing Element certification and annually thereafter. ▪ Complete zoning ordinance amendments and establish policies and procedures to facilitate these types of projects within one year following Housing Element Certification. ▪ Participate in Countywide process in 2024. ▪ Establish a grant or loan program by Q4 2025. ▪ Conduct analysis and outreach related to units on sloped sites in Q2 2025. ▪ Join ADU Resource Center and launch online plans gallery in Q3 2024. ▪ Create new outreach materials in Q1 2025. ▪ Conduct outreach to all ADU/JADU/SB9 owners within 9 months of Housing Element Certification and annually thereafter. ▪ Create a list and map of existing ADUs, JADUs and SB9 units within six months of Housing Element adoption. ▪ Participate in regional process to establish an ADU monitoring program on timing they set forward. ▪ If ADU production does not meet target, consider additional efforts such as reducing process and permitting fees to incentivize production in 2027.

Fair Housing Issue	Contributing Factors	Priority Level	Meaningful Program Actions (from <i>Chapter 7, Goals, Policies, and Programs</i>)	Targets and Timeline
Persons with disabilities and persons of color are most likely to file fair housing complaints with HUD.	Lack of accessible affordable units; housing discrimination.	Medium	<ul style="list-style-type: none"> ▪ H5.5: Provide Fair Housing Training for Landlords and Tenants. 	<ul style="list-style-type: none"> ▪ Ongoing annual check in with Project Sentinel. ▪ Provide training in 2025 and every two years thereafter.

Source: City of Belmont, 2024.

4

CONSTRAINTS

Many factors can encourage or constrain the development, maintenance, and improvement of the housing stock, including economic forces in the private market as well as regulations and policies imposed by public agencies. Constraints including physical constraints, land availability, the economics of development, and governmental regulations each have an impact on the cost and amount of housing produced.

State law, specifically Government Code Section 65583(a)(5-6), requires that housing elements analyze potential and actual governmental and nongovernmental constraints to the production, maintenance, and improvement of housing for persons of all income levels and disabilities. The constraints analysis must also demonstrate local efforts to remove or mitigate barriers to housing production and housing for persons with disabilities. The identification and analysis of these constraints have informed the City of Belmont's development of appropriate programs that mitigate these constraints, as provided in *Chapter 7, Housing Goals, Policies, and Programs*.

4.1 NON-GOVERNMENTAL CONSTRAINTS

Non-governmental constraints are those that are generated by the economic and social environment which are beyond the control of local governments. Some of the impacts of non-governmental constraints can be offset to a minimal extent by local governmental actions, but usually the effects are localized and have little influence on the housing need in the jurisdiction or market area.

DEVELOPMENT COSTS

CONSTRUCTION AND LABOR COSTS

Construction costs, which can comprise a significant portion of the sales price of a housing unit, are one of the major cost factors with residential development. According to a report released in March 2020 on multi-family construction costs in California from the Turner Center, many different factors layer together to affect the bottom-line costs of building new housing and whether or not a project will ultimately “pencil”: the costs of acquisition (e.g., land and closing costs), hard construction costs (e.g., materials and labor), soft costs (e.g., legal and professional fees, insurance, and development fees), and the costs of conversion once a project is completed (e.g., title fees and the operating deficit reserve).¹ According to its research, the largest share of a project’s total cost comes from materials and labor, or hard costs.

Hard construction costs make up more than 60% of total development costs. The Turner Center study found that on average, construction costs were about \$222 per square foot in 2018 compared to \$177 in 2008 to 2009, representing a 25% increase. While these increases have been felt across the State, costs are highest in the Bay Area, which saw costs rise by 119% during the same period, to over \$380 per square foot. The reasons for this are complex, but the Turner Center suggests this is in part because of higher labor costs to attract workers since the cost of living is so high here; local regulations that require certain materials or building components to be used; lengthy review processes; and other local constraints.²

Statewide labor costs have also increased in recent years as the labor pool has not kept pace with the increase in demand. Since the recession, California has seen a severe tightening in the construction labor market, especially for workers trained in specific construction trades. The lack of an available labor force drives up the cost of labor and leads to project delays as workers are either unavailable or lost to more profitable projects.

Several additional factors have caused the increased cost of materials, including global trade patterns and federal policy decisions such as tariffs, as well as state and local regulations such as building codes. The COVID-19 pandemic has also influenced the cost and availability of construction materials. Supply chain disruptions have resulted in project delays and increased costs due to a shortage of construction materials and equipment.

PRICE OF LAND

The cost of land has also increased substantially over the past decade. Many jurisdictions are now essentially built out, with no available vacant land for development. Many locations in the

¹ See the Turner Center’s series on housing costs at <https://turnercenter.berkeley.edu/research-and-policy/the-cost-of-building-housing-series/>.

² Turner Center, 2020. “The Hard Costs of Construction: Recent Trends in Labor and Materials Costs for Apartment Buildings in California,” p. 15, March.

Bay Area experience substantially higher land values than in other areas in the State because of the attractiveness of living along the coast with its mild climate, access to high-tech jobs, and plentiful amenities. A study by Economic & Planning Systems (EPS) in April 2020 analyzed per-acre prices for vacant land in Belmont required by the Quimby Act to update the Parkland Dedication in-lieu fee calculations; the evaluation found that over a roughly two-year period (2018 to 2019), the average price per acre for residential land sales was approximately \$3.5 million as shown in Table 4-1.

TABLE 4-1: VACANT LAND COSTS PER ACRE (2020)

Address	Date Sold	Price	Acreage	Price Per Acre
816 Covington	8/27/2019	\$2,000,000	0.72	\$2,777,778
2244 Semeria	4/26/2019	\$580,000	0.13	\$4,461,538
2121 Arthur	3/15/2019	\$775,000	0.14	\$5,535,714
1822 Hillman	3/14/2019	\$775,000	0.14	\$5,5335,714
Lots 1 & 3 Upper Lock	1/30/2019	\$173,000	0.65	\$266,154
Alhambra	9/26/2018	\$43,800	0.40	\$109,500
0 Arthur	9/19/2018	\$545,000	0.19	\$2,868,421
0 San Ardo	7/30/2018	\$125,000	0.33	\$378,788
3147 Marburger	5/18/2018	\$1,650,000	0.12	\$13,750,000
2902 San Juan	5/18/2018	\$2,400,000	0.14	\$17,142,857
Undisclosed	4/24/2018	\$2,000,000	0.15	\$13,333,333
2 Monte Cresta	3/25/2018	\$130,000	0.10	\$1,300,000
Weighted Average, Rounded^a				\$3,500,000

^a Rounded to nearest \$1,000,000.

Sources: Zillow; Economic & Planning Systems, Inc.

By contrast, during the last Housing Element a similar analysis found that average per-acre prices were approximately \$820,000. This means that since the last Housing Element, land prices have increased more than 325%.

All these factors work together to make it so developers must charge substantial rents and sales prices to cover these costs. The Turner report notes that, for example, a multi-family unit that costs \$800,000 to build will need to charge approximately \$4,000 in monthly rent—a price well over the typical monthly earnings in the state—to cover those costs and meet return on investment requirements for investors.

The impact of high construction and land costs on affordable housing cannot be understated. According to a study by the Bay Area Council, in 2019 there were 23 new construction projects of below market-rate housing financed through the California Tax Credit Allocation Committee (TCAC), with a total of 1,912 units across six counties of the nine-county Bay Area. Each project in California requested federal and/or state tax credits to finance the new construction of housing units with rents affordable to households earning 30-60% of area median income (AMI; this translates to very low-income households). The project costs consisted of land and

4. CONSTRAINTS

acquisition, construction costs, construction contingency, architectural/engineering, construction interest, permanent financing, legal fees, reserves, other costs, developer fees, and commercial costs. Project costs were analyzed to determine the reasonableness of all fees within TCAC’s underwriting guidelines and TCAC limitations.

The report found that the average construction cost of new below market rate housing in the Bay Area was \$664,455 per unit—far more than lower-income households can afford without subsidies (see Figure 4-1). By comparison, other projects across California (excluding the Bay Area), on average cost \$385,185 per unit of below market rate housing.³

Figure 4-1: Average Per Unit Cost Construction of New Below Market Rate Housing (2019 Data by County)



Source: California Tax Credit Allocation Committee
Analysis: Bay Area Council Economic Institute
Note: No data available for Contra Costa, Marin, and Solano counties



AVAILABILITY OF FINANCING

The availability of capital to finance new residential development is a significant factor that can impact 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 impact home construction, purchase, and improvement costs. Fluctuation in interest rates can have a significant impact on costs for construction or purchase, as well as impact whether a potential buyer can qualify for a loan. Since mid-2022, interest rates have soared after several years of historical lows, and a strong consumer price index report in March 2024 means they are

³ <http://www.bayareaeconomy.org/how-much-does-it-cost-to-produce-one-unit-of-below-market-housing-in-the-bay-area/>.

expected to remain steady through mid-2024.⁴ Competition for affordable housing funding also affects overall housing production. Low Income Housing Tax Credits (LIHTC) represent the primary funding source for new affordable housing. Historically the 9% tax credit (which is designed to subsidize 70 percent of the project cost) has been extremely competitive. Affordable housing developers are indicating that 4% tax credits (designed to subsidize 30 percent of the project) are becoming increasingly competitive, resulting in a longer project timeline and delayed start of construction (up to two additional years, as they must apply multiple times before they are able to secure tax credits).

COMMUNITY OPPOSITION

As development activities increase, many communities are met with opposition to new housing developments that are perceived to threaten existing community character, increase neighborhood traffic, or limit land available for commercial development activity. The projects that most often draw opposition are high-density multi-family developments, transitional or supportive housing, and housing affordable to lower-income households. Belmont City officials, staff, and developers can work to assuage these concerns by relying on the adopted objective design standards for multi-family development during the design review process, emphasizing quality management of new developments, and engaging in public education to address myths about high-density/affordable/supportive housing.

LOT SIZE CONSTRAINTS

The City of Belmont recognizes the challenges associated with building housing, especially that which is affordable, on infill sites. Many parcels in the Belmont Village area and along El Camino Real are considered small. For example, the average size of a parcel zoned Corridor Mixed Use (CMU) on El Camino Real is 0.3 acres. The City acknowledges that parcels may need to be consolidated under one owner to facilitate mixed use and affordable housing development.

A review of pending and pipeline projects in Belmont indicates that housing developers have been successful in consolidating parcels to create larger project development sites and also have managed to design projects that work on smaller sites that are less than half an acre. Certain incentives, such as State Density Bonus, enable housing developers to achieve the densities required to support the financial impacts of lot consolidation and/or development of constrained sites. More information on lot consolidations and small lot developments in existing pipeline and pending projects in Belmont that are either under construction or in development review are described in *Chapter 6, Adequate Sites* (see Table 6-4 and 6-5).

Unlike many other Peninsula communities, Belmont does not have a historic “main street” or a cohesive downtown residential district. The Belmont Village Specific Plan (BVSP) area consists primarily of small shopping centers, with stores facing onto large surface parking lots rather than sidewalks. This auto-oriented format contributes to a scattered pattern of development

⁴ Kiplinger Interest Rates Outlook: Still-Strong Inflation Will Delay Fed Rate Cuts, April 11, 2024, <https://www.kiplinger.com/economic-forecasts/interest-rates>.

activity, with no clear focal point to attract people and create a sense of destination. Additionally, heavy, fast-moving traffic on Ralston Avenue and El Camino Real creates a barrier that divides the downtown area. The BVSP includes policies to encourage more intense, compact development and active ground floor uses to address these conditions.

ENVIRONMENTAL CONSTRAINTS

The environmental setting affects the feasibility and cost of residential development. Environmental issues range from the suitability of land for development, the provision of adequate infrastructure and services, as well as the cost of energy. Belmont currently encompasses about 2,955 acres, and most of the parcels in the city's boundary are developed. Most of the undeveloped parcels are in the Western Hills area, with smaller amounts in the San Juan area and east of U.S. 101 freeway. These areas contain environmental constraints on development, such as steep slopes, landslide hazards, and fire or flood hazards; therefore, much of the undeveloped land has been set aside as open space. The following are environmental constraints and hazards that affect, in varying degrees, existing and future residential developments.

SEISMIC HAZARDS

The San Andreas Fault Zone is located one mile from Belmont's western boundary; however, there are no known active faults within the city. Major problems could result from ground shaking, which is likely to be amplified in the areas underlain by relatively unconsolidated deposits, especially in the eastern part of the city. Liquefaction is also a possibility in these areas. There is potential for landslides on all slopes; only site-specific investigations can differentiate the degree of risk.

TOPOGRAPHY/SLOPE

The western portion of Belmont is defined by the San Juan Hills, a section of the Santa Cruz Mountains, while the eastern portion of the city is relatively flat extending toward the San Francisco Bay. Elevations range from 0 to 838 feet above sea level. Portions of the city are steep and susceptible to landslides, slippage, erosion, and other topographic hazards. The City adopted the San Juan Hills Area Plan in 1988. The Plan found that two-thirds of the lots in the Study Area exceeded 30% slope and 90% were geologically unstable with high landslide probability. The Plan encouraged landowners to work with the City using transfer of development rights to create safer, compact, and environmentally sensitive development.

FLOOD HAZARDS AND SEA LEVEL RISE

Historical records show that sea level in San Francisco Bay has risen about 7 inches (18 cm) over the past 100 years (as of 2017). Scientists agree that the rate of sea level rise is accelerating, but projections of future sea levels vary considerably. Present projections used by the State of California are for 14 inches of sea level rise by 2050 (using 2000 as the baseline) and for between 40 and 55 inches by 2100, depending upon the emission scenario used. In 2009, the Bay

Conservation and Development Commission (BCDC) released *Living with a Rising Bay*, an assessment that included the following.

- Increased flooding risk for 270,000 Bay Area residents with a 55-inch rise.
- Estimated \$36 billion in at-risk property by 2050, and \$62 billion by 2100.
- Estimated 95% of tidal wetlands vulnerable to sea level rise, which may increase flooding and erosion.

The City's flood plain management ordinance requires flood proofing or elevation of structures above flood heights along portions of Belmont Creek and east of Bayshore. The City will continue to regulate development in the designated flood hazard areas in accordance with the ordinance. Belmont has a history of localized flooding caused by inadequate storm drainage and has taken actions to address flooding problems, including upgrading and regular maintenance of the storm drain system (see Figure 4-2 below).

FIRE HAZARDS

Fire hazards in Belmont include both urban and wildland fires. Urban fires involve the uncontrolled burning of built structures due to human-made causes; wildland fires affect grassland, forest, and brush (and the structures on them), and can result from either human or natural causes. Belmont has a substantial risk of wildland fires, with many areas of high and very high threat, particularly in the western areas of the city.

The canyons of the Western Hills have been designated as a Very High Fire Hazard Severity Zone (VHFHSZ) by the California Department of Forestry and Fire Protection (Cal Fire), while the San Juan Canyon has been designated as a High Fire Hazard Severity Zone. Figure 4-3 shows fire hazards severity areas including the existing VHFHSZ within the city boundary.

The housing opportunity sites are located primarily within the Belmont Village Specific Plan Area, along El Camino Real, or in the area between El Camino Real and the Highway 101 freeway. These opportunity sites are on flat, mostly developed terrain surrounded by freeways and major urban roads and not conducive to the spread of wildfire and are not designated as Fire Hazard Severity Zones.

REQUESTS FOR HOUSING DEVELOPMENTS AT REDUCED DENSITIES

State law requires the Housing Element to include an analysis of requests to develop housing at densities below those anticipated in the Sites Inventory. In Belmont, housing projects are frequently proposed at or above previously zoned density, in part because of the use of density bonuses. Belmont is moving away from applying a density metric in areas that allow multi-family residential development and instead focusing on floor area ratio as the appropriate zoning metric which enables residential development projects to achieve substantially higher densities than were previously permitted. More discussion of this is found in *Chapter 6, Adequate Sites* under the Sites Inventory Methodology section pertaining to the inventory of sites to meet the City's Regional Housing Needs Allocation (RHNA).

Figure 4-2: Flooding and Fire Hazards

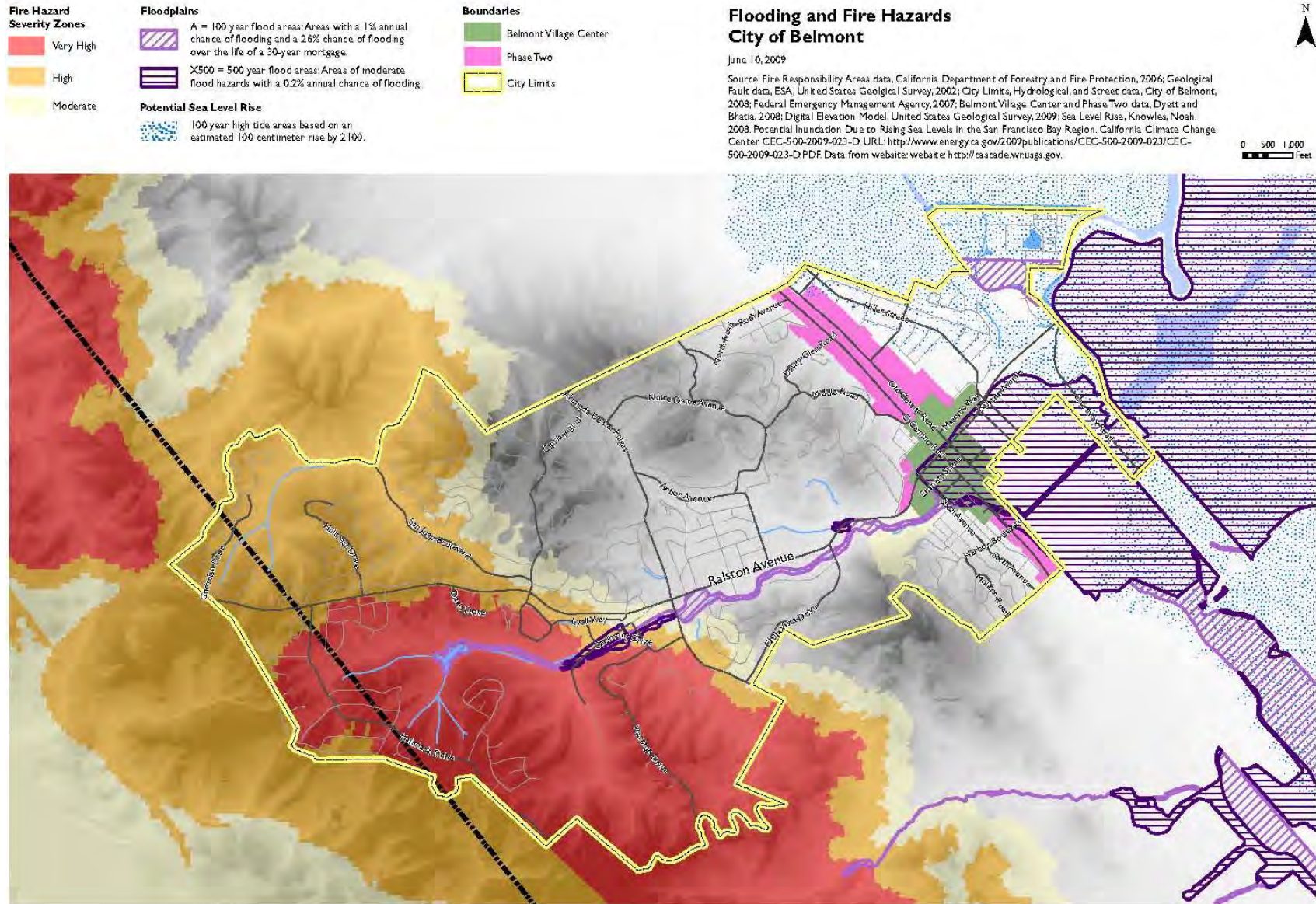
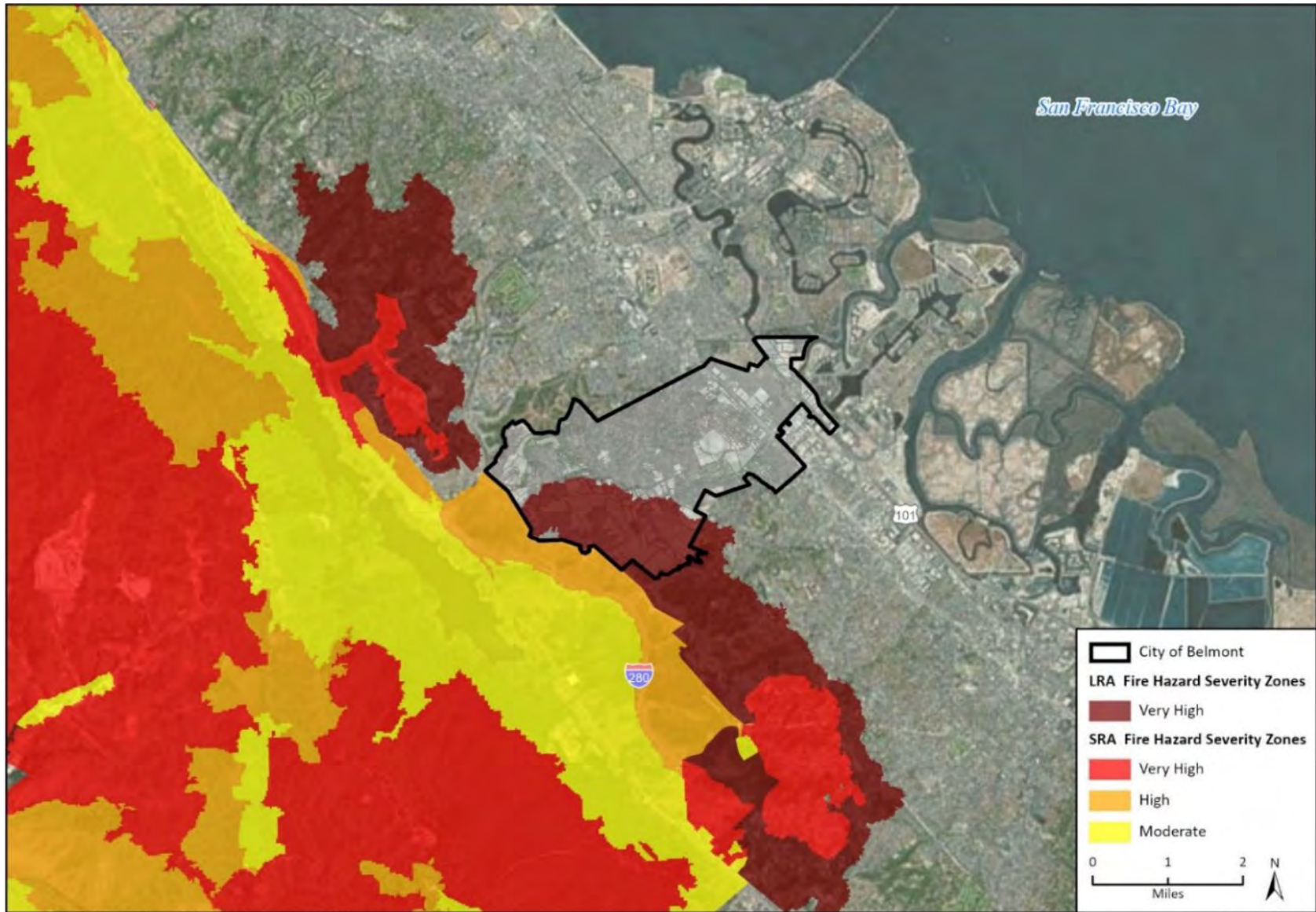


Figure 4-3: Fire Hazard Severity Zones Near Belmont



Imagery provided by Esri, Microsoft Bing, and their licensors © 2021.
Additional data provided by City of Belmont, 2014 and CalFire, 2021.

20-10317 Belmont, Bing, Hang
8x11 Fire Hazard Severity Zones

BUILDING PERMIT TIMEFRAME

After a planning entitlement for a housing development project has been approved by the Zoning Administrator, Planning Commission, or City Council; it becomes the applicant's responsibility to initiate the steps to secure building permit approvals and begin construction in accordance with the approved plans. The length of time between a project's planning entitlement approval and building permit application is determined by the applicant.

Intervening steps include obtaining additional City clearances and paying fees as outlined in a project's conditions of approval. Other necessary actions for the applicant include the following.

- Completing civil engineering and construction drawings after project entitlement approval (City does not control this timeline);
- Recording lot consolidation or parcel/final map with the County Clerk/Recorder;
- Retaining contractors to construct the project;
- Obtaining utility agency or other environmental regulatory agency approvals (not owned by the City), establishing required easements, and rights of entry; and
- Providing tenant relocation assistance, when applicable.

Belmont has taken several steps to establish a clear and timely permit review process, including offering many payment and plan submittal options both online and in-person. Once a project begins the building permit application review process, the applicant also has a shared responsibility in resubmitting materials and addressing comments in a timely manner. With responsive applicants, the following general timelines can be achieved during the building permit stage.

- Single-family projects generally take 1-3 months to receive a building permit.
- Multi-family and mixed-use projects generally take 8-10 months.
- If the project includes a Final or Parcel Map, an additional 3-4 months is usually required prior to building permit issuance. Final Map review can be completed concurrently with building permit review.

Note: Actual timeline depends on how quickly an applicant can resubmit plans with corrections, the complexity of the project, etc.

Table 4-2 presents a summary of four recently permitted housing projects in Belmont and the time between entitlement approval, building permit application, and building permit issuance.

TABLE 4-2: PREVIOUS DEVELOPMENT TIMELINES

Project	Number of Units	Entitlements Approved	Building Permit Application	Final Map Recorded	Building Permit Issued
Firehouse Square	66 affordable rental units	October 2019	December 2019	June 2020	August 2020
Artisan Crossings, 1325 Old County Rd ^a	250 units; 212 market rate, 38 affordable	May 2019	August 2019	May 2021	May 2021
815 Old County Rd	177 units; 150 market rate, 27 affordable	June 2021	June 2021	N/A	April 2022
803 Belmont Ave ^b	125 affordable rental units	May 2022	September 2023	April 2024	May 2024

^a This project timeline was longer than typical since several parcels needed to be annexed from the County in the City of Belmont through LAFCO.

^b This project timeline was longer than typical since the project applicant needed to apply for and be awarded tax credit financing in order to proceed with construction.

Source: City of Belmont, 2024.

LOCAL EFFORTS TO REMOVE NONGOVERNMENTAL CONSTRAINTS

The Housing Element 2023-2031 Sites Inventory relies heavily on non-vacant sites to accommodate the regional housing need for lower-income households. The City has identified the following incentives and concessions to mitigate non-governmental constraints and to promote residential development on non-vacant sites at all affordability levels.

- State Density Bonus.** Belmont Zoning Ordinance Section 26, Density Bonus, originally adopted in 2014, specifies how local compliance with State Density Bonus Law (Government Code Section 65915) will be implemented to encourage production of lower-income housing units in Belmont. The Density Bonus program allows housing developers to request zoning incentives and waivers, such as a reduction in site development standards or modification of a zoning code requirement, that enable a project to achieve a higher project density and provide additional affordable housing units. The City's Inclusionary Ordinance requires housing developments to provide 15% of their units as affordable if they are 25 units or above, resulting in these projects automatically qualifying for State Density Bonus. As a result, this program has been used by nearly every recently built project in Belmont, and the City expects this will continue to incentivize increased housing production during the next planning period. Although the Belmont Zoning Ordinance was adopted in 2014, the City continues to update its processes and procedures to comply with current law. Program H4.2, Zoning Code Amendments to Remove Constraints, includes updating the Ordinance in 2024 and regularly thereafter.
- Zoning Modifications to Increase Density.** The Housing Element includes Program H4.1, Update Zoning Code to Increase Floor Area Ratios and Density, to modify the Zoning Ordinance to incentivize increased housing unit production (completed in January 2024). The CMU zoning district, which includes most of the property along the entire El Camino Real frontage, was amended to increase the maximum floor area ration (FAR) from 1.75 to 2.0 (up to 2.5 with provision of community benefits), and to eliminate the maximum residential density. Similarly, the Village Station Core (VSC) zoning district was modified to increase the maximum floor area ration from 1.5 to 2.0 (up to 2.5 with provision of

community benefits); the VSC zoning district already has no maximum residential density metric. Both amendments are anticipated to provide a significant financial incentive to housing developers and to encourage provision of affordable housing units. The Inclusionary Housing Requirement will be amended (Program H5.3, Modify the Inclusionary Housing Program) to further incentivize provision of lower-income housing units.

- **Affordable Housing Mitigation Fees.** The City collects inclusionary housing in-lieu fees (for projects under 25 units) along with housing commercial linkage fees (collectively referred to as housing mitigation fees) to be used for housing production and preservation. Program H1.2, Use Public Funding for Low/Moderate Income Housing, directs the City to use these fees to fund affordable housing development, with a priority on lower income levels. City financial contributions have been crucial in supporting current 100% affordable housing projects in Belmont, including Firehouse Square (66 affordable apartments), ROEM Housing Corporations project at 803 Belmont Avenue (125 affordable units), and the Linc Housing project at Hill Street and El Camino Real (37 affordable units).

4.2 GOVERNMENTAL REGULATIONS AND CONSTRAINTS

This section describes City policies and regulations that could potentially constrain the City's ability to achieve its housing goals. Potential constraints to housing development include land use controls (through General Plan policies and zoning regulations), development standards, infrastructure requirements, development impact fees, and development approval processes. While government policies and regulations are intended to serve public objectives and further the public good, the City recognizes that its actions can potentially constrain the availability and affordability of housing to meet the community's future needs.

LAND USE CONTROLS

The Land Use Element of the Belmont General Plan sets forth the City's policies for guiding local development. These policies, together with existing zoning regulations, establish the amount and distribution of land allocated for different uses within the city. Table 4-3 describes General Land Use designations that allow residential uses. The low-, medium-, and high-density districts, and the Hillside Residential Open Space district, differ in allowable density and development standards. In addition, the General Plan permits multi-family residential uses in the Belmont Village Specific Plan (BVSP) Area and in the Corridor Mixed Use (CMU) zone along the El Camino Real corridor.

In 2017, the City completed a comprehensive update of the Belmont 2035 General Plan and adopted the BVSP which established new Village zoning districts in the BVSP area and created a new CMU zoning district along the El Camino Real corridor. These regulatory updates were designed to modernize and simplify zoning standards, and to accommodate higher-density and mixed-use housing near transit.

TABLE 4-3: LAND USE CATEGORIES ALLOWING RESIDENTIAL USES

General Plan Land Use	Zoning District(s)	Density (Units per Acre)	Residential Type(s)
Low-Density Residential	R-1	1-7	The Low-density Residential land use designation applies to the use of land primarily for single-family detached residences but can also include townhouse developments that are clustered to provide open space.
Medium-Density Residential	R-2, R-3	8-20	The Medium-density Residential land use designation applies to the use of land for duplexes, townhomes, low-rise apartment buildings, and other less intense multi-family residential development types.
High-Density Residential	R-4	21-30	The High-density Residential land use designation applies to multi-family apartment buildings.
Hillside Residential Open Space	HRO	Density determined by slope	The Hillside Residential and Open Space land use designation applies to land in the San Juan and Western Hills Plan areas that contain steep slopes, species habitat, and environmental resources.
Belmont Village Mixed-Use	VCMU VHDR VC VSC	No density limit	The Belmont Village Mixed Use and Belmont Village High-density Residential land use designations applies to parcels in the Belmont Village Priority Development Area (PDA) and is intended to promote a pedestrian-oriented, mixed-use core in Downtown Belmont.
Corridor Mixed-Use	CMU	No density limit	The Corridor Mixed Use land use designation applies to parcels along El Camino Real outside of the Belmont Village PDA and is intended to provide community and visitor-serving retail and services, high-density residential, lodging, and office.

Source: Land Use Element, Belmont General Plan; Belmont Zoning Ordinance; Belmont Village Specific Plan.

ZONING ORDINANCE

The City regulates the type, location, density, and scale of residential development through the Zoning Ordinance. Zoning regulations are designed to protect and promote the health, safety, and welfare of local residents, as well as implement the policies of the General Plan. The Ordinance sets forth the City's residential development standards, including density, height, lot coverage, and parking.

ALLOWED RESIDENTIAL USES

Table 4-4 summarizes the various housing types currently permitted within Belmont's residential and corridor mixed use zones. Each use is designated by a letter denoting whether the use is allowed (P) or conditionally permitted (C). As indicated, multi-family dwellings are permitted in residential zones (R-3 and R-4) and the CMU district when located above the ground floor. Table 4-5 summarizes residential use regulations in the Village zoning districts. Related to residential uses on ground floors, please see detailed discussion below in the Zoning for a Variety of Housing Types – Mixed-Use Zones subheading.

4. CONSTRAINTS

TABLE 4-4: HOUSING TYPES PERMITTED IN RESIDENTIAL AND CORRIDOR MIXED-USE DISTRICTS

Type	HRO	R-1	R-2	R-3	R-4	CMU
Single-Family ^a	P	P	P	P	P	
Duplex (2 units)			P	P	P	
Single-Family Row House/Townhouse	C ^b			P	P	
Multi-Family ^c				P	P	P/C
Accessory Dwelling Units (ADUs)	P	P	P	P	P	P
Nursing / Convalescent Homes ^e						
<i>Six or Fewer Residents</i>	C	P	P	P	P	C
<i>Seven or More Residents</i>		C	C	C	C	C
Homes for the Ambulatory Aged and Retirement Homes				C	C	C
Lodging /Boarding / Rooming Houses					C	C
Transitional Housing ^f		ns	ns	ns	ns	ns
Emergency Shelters		ns	ns	ns	ns	P ^g
Fraternity & Sorority Houses					C	C
Apartment Hotel						ns

Key: P = Permitted C = Conditionally Permitted ns = Not Specified

^a There are three HRO districts. Single-family residences are not permitted in HRO-3 zones west of Hastings Drive and accessed by Carlmont Drive.

^b Townhouses are permitted with a CUP in the HRO-3 zone only.

^c In the Corridor Mixed Use district multi-family housing is a permitted land use when located above the ground floor; multi-family residential uses are conditionally permitted on the ground floor. See discussion below.

^d Mobile home parks currently only allowed in M-1 zones; subject to rezone per Program H4.2.

^e The City's current Zoning Ordinance includes a definition for Nursing/Convalescent homes that covers licensed care facilities and other group care facilities such as hospices. Updates will be done per Program H4.2.

^f Transitional and Supportive Housing, as well as Emergency Shelters, will be permitted in all Multi-Family Residential zoning districts per Program H4.2.

^g Emergency Shelters permitted by right on CMU zoned parcels in the S-2 Emergency Shelter Combining District.

Source: Zoning Ordinance; City of Belmont Planning Department.

PLANNED DEVELOPMENT DISTRICT

The Planned Development (PD) district accommodates various types of uses, such as single-family and multi-family residential developments, neighborhood and community shopping centers, professional and administrative areas, and other uses or a combination of uses that can be made appropriately as part of a Planned Unit Development (PUD). The PD district is established to allow flexibility of design that is in accordance with the objectives and spirit of the General Plan.

The PD zone is intended to enable the City to modify site development standards to facilitate development projects. In addition, the project can be presented as a complete package and potentially avoid the additional time and costs associated with multiple variances. However, because a zoning change requires multiple hearings and a legislative action, the PD process may extend the total development review time. PD zoning is another, optional tool for applicants to pursue projects beyond the zones that permit residential development with unlimited density.

TABLE 4-5: HOUSING TYPES PERMITTED IN VILLAGE ZONING DISTRICTS

	Village Core (VC)	Village Station Core (VSC)	Village Corridor Mixed-Use (VCMU)	Village High-Density Residential (VHDR)
Family Day Care Home				
<i>Small Family</i>	X	X	X	P
<i>Large Family</i>	X	X	X	P
Elderly and Long-Term Care	X	X	Pu, Cg	P
Group Residential	Pu	Pu	Pu, Cg	P
Multiple-Unit Dwelling ^a	Pu, Cg	P, Cg	Pu, Cg	P
Residential Facility	X	X	Pu, Cg	P
Senior Citizen Housing	Pu, Cg	X	Pu, Cg	P
Transitional Housing ^b	X	X	Pu, Cg	P
Emergency Shelters			P	
Two Unit Dwelling (duplex) ^c	X	X	X	C

Key: P: Permitted by right; Pg/Pu: Permitted on ground floor or upper floors only, respectively; C: Conditional use permit required; Cg: Conditional permit required for ground uses; Cu: Conditional permit required for uses on upper floors; X: Prohibited new (existing may remain); CL Conditional Limited (allowed where existing; new uses allowed within existing retail or office only as ancillary use).

^a Multi-family entrance lobbies allowed on ground floor in the Active Use Frontage Overlay (AUFO).

^b Transitional and Supportive Housing, as well as Emergency Shelters, will be permitted in all multi-family residential zoning districts per Program H4.2, Zoning Code Amendments to Remove Constraints.

^c Duplex uses subject to objective design review standards pursuant to BZ0 Section 13A.

Source: Zoning Ordinance; City of Belmont Planning Department.

During previous planning period, the City of Belmont used the PD District to facilitate the construction of various types of housing. The City used the PD process in October 2014 (prior to the City's current regulations that encourage housing) to entitle a mixed-use project with housing units over retail Downtown at 576-600 El Camino Real. In October 2021, the City approved a 16-unit market rate townhome project at 800 Laurel Street with a PD zoning designation that allowed the project to provide medium-density residential housing (townhomes) near the Belmont Village Specific Plan area and the Belmont Caltrain Station. The City does not anticipate significant development in the planning period with a PD designation, given the current policy framework, but it provides an additional tool for unique or challenging sites.

RESIDENTIAL DEVELOPMENT STANDARDS

Development standards can sometimes constrain the number of units that may be constructed on a particular property to a level below the maximum density. Critical standards include setbacks, height, parking, and open space requirements. By limiting the number of units that could be constructed, the per-unit land costs would necessarily be higher and, all other factors being equal, result in higher development costs which could impact housing affordability. Development standards are typically a major constraint on small lots zoned for multi-family

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development, where setbacks and parking requirements can consume a sizable percentage of the total lot. Larger lots, such as those over an acre in size, can more easily achieve the allowed density.

Over the past two planning periods, Belmont has made significant revisions to land use and zoning standards for residential and mixed-use zoning districts throughout the city, including adoption of the Belmont Village Specific Plan and related Belmont Village zoning districts, and establishing a new CMU zoning district. These efforts, completed in 2017, included analysis of zoning standards and adoption of form-based codes that allow maximum flexibility for developers and do not discourage development of multi-family projects in Belmont. The 1,023 new housing units as pending and pipeline project are attributable to these revised development standards.

Table 4-6 details the City's residential development standards for the zones allowing housing. Table 4-7 details development standards in the Belmont Village zoning districts.

While the City strongly believes that current development standards in the Belmont Village districts and CMU zoning district do not preclude projects from achieving full development capacity, it is important that the City commit to ongoing evaluation of development standards and entitlements that have the potential to detrimentally impact the cost and supply of new housing, and the ability for developers to achieve market-feasible densities. The City has included Program H4.7, Evaluation of Zoning Constraints, which commits the City to monitor and analyze the interrelationship between the zoning standards, objective design standards, and State Density Bonus to identify and remove constraints to housing development. In addition, the City will conduct a peer agencies evaluation of zoning standards such as height and open space requirements as part of the analysis.

OPEN SPACE REQUIREMENTS

To ensure adequate open space is provided in multi-family housing, the Zoning Ordinance requires minimum open space requirements in the R-3, and R-4 zones and Belmont Village zoning districts. Residential developments are required to provide a minimum of 300 square feet of open space for each unit located on the ground floor, and an additional 150 square feet of open space for each unit located above the ground floor. The Village Zoning districts require 200 to 300 square feet up publicly accessible open space per unit. The following may be used to satisfy the open lot area requirement for each unit above the first floor: open roof decks, balconies, lanais, or other open structural areas made a part of the building and improved for outdoor living. These open space requirements have not been a constraint to housing development, as demonstrated by the large number of pipeline and pending projects.

TABLE 4-6: RESIDENTIAL ZONING DEVELOPMENT STANDARDS

	HRO ^a	R-1 ^b	R-2	R-3	R-4	CMU
Building Standards						
Density Range (du/ac)	0.108–1.452	1–7	14 or less	20 or less	30 or less	No max. ^c
Minimum Floor Area/Unit (sf)	900–1,200 ^e	1,200	None specified	0-Bedroom = 420 1-Bedroom = 600 2-Bedroom = 780 3-Bedroom = 960		1,450
Maximum Building Height (ft)	28	28	35 (2 stories ^d)		50	45-55
Maximum Floor Area Ratio	4,500 sf max. on lots 20,000 sf or larger; 3,500 sf on all other lots	0.27–0.53 ^e	0.6	0.85	1.4	1.75-2.2
Lot Standards						
Minimum Lot Area (sf)	30,292– 403,333	5,000–9,600	6,000	6,000	6,000	7,200
Minimum Lot Width	60	50-70	60	60	60	60
Building Setbacks and Open Space						
Front Yard (ft)	15	15-25	15-25	15	15	0 ^e
Side Yard (ft)	15	6-25	6-25	6-15	15	0
Rear Yard (ft)	7	15-30	15-30	15	15	0
Open Space Required (sf)	N/A	N/A	N/A	300 sf each ground floor unit, plus 150 sf each unit above ground floor ^f		

^a There are three HRO districts: HRO-1, HRO-2, and HRO-3.

^b There are five R-1 districts: R-1A, B, C, E, and H.

^c The maximum density in the CMU District was previously 45 units per net acre, which could be increased to 60 units per acre with provision of community benefits. The City eliminated the CMU maximum density in January 2024.

^d There are a very limited number of sites in Belmont still zoned R-2 and R-3, see additional discussion of these zoning districts in the Multi-Family Zoning section.

^e Depending on slope.

^f Ground floor residential subject to 10 feet front yard; 5 feet plus 2 feet per each additional story above three stories, side yard; and 15 feet rear yard.

Sources: City of Belmont General Plan; Zoning Ordinance, City of Belmont.

4. CONSTRAINTS

TABLE 4-7: VILLAGE ZONING DISTRICT DEVELOPMENT STANDARDS

	Village Core (VC)	Village Station Core (VSC)	Village Corridor Mixed-Use (VCMU)	Village High-Density Residential (VHDR)
Lot Size, Setbacks, Density, and Lot Coverage				
Minimum Lot Area (sf)	5,000	7,200	7,200	7,200
Minimum Lot Width (ft)	50	60	60	60
Minimum Setbacks	None except when a lot abuts a lot in a residential zoning district			
Minimum; Maximum Residential Density (du/ac)	N/A	N/A	N/A	21; 45-60 w/comm. benefits
Maximum Site Coverage (% of Lot)	90	80	80	80
Building Form and Street Frontage Standards				
Minimum; Maximum Floor Area Ratio (FAR)	0.5; 2.0 (2.5 w/ community benefits)	0.2; 2.0 ^a (2.5 w/ community benefits)	0.5; 2.0 (2.5 w/ community benefits)	N/A
Minimum; Maximum Building Height (ft)	20; 50 (65 w/ community benefits)	20; 45 (60 w/ community benefits)	None; 50 (65 w/ community benefits)	None; 55
Minimum Ground Floor Height (ft)				
– Active Use Frontage Overlay Zone	16	16	N/A	N/A
– Non-Residential	16	12	12	12
– Residential	10	10	10	10
Building Bulk (Maximum Floorplate as Percent of First Floor Footplate)	1-story: 100% 2-story: 100% 3-story: 85% 4+ story: 70%	1-story: 100% 2-story: 100% 3-story: 85% 4+ story: 70%	1-story: 100% 2-story: 100% 3-story: 85% 4+ story: 60%	1-story: 100% 2-story: 100% 3-story: 85% 4+ story: 60%
Limitations on Blank Walls	Yes	Yes	Yes	Yes
Build-to Lines	Yes	Yes	Yes	No
Ground Floor Transparency	Yes	Yes	Yes	No
Building Entrances	Yes	Yes	Yes	Yes
Street Frontage Standards	Yes	Yes	Yes	Yes
Open Space and Outdoor Living Area for Residential Units				
Minimum Publicly Accessible Open Space Area (SF)				
Lots <12,000 sf	N/A	N/A	N/A	N/A
Lots ≥12,000 sf	300	300	200	N/A
Minimum Dimensions (ft)	15	15	10	N/A
Minimum Outdoor Living Area per Unit (sf)	36	36	36	80
Minimum Landscaping (% of Lot)	10	10	10	10

Sources: City of Belmont General Plan; Zoning Ordinance, City of Belmont.

PARKING REQUIREMENTS

The City's parking requirements vary depending on housing type and anticipated needs. Table 4-8 summarizes the City's existing parking requirements. The City's parking requirements display flexibility to facilitate the development of housing for special needs groups. For instance, nursing homes and senior congregate care facilities are required to provide only one space per four beds while dormitories and other student housing are required to provide only one space per every five beds.

TABLE 4-8: RESIDENTIAL ZONES PARKING REQUIREMENTS

Housing Type	Spaces Per Unit		
	Covered	Open	Total
Single-Family	2	2	4
Accessory Dwelling Units	0	0	0
Multi-Family (R-2, R-3, R-4)	1	1	2
Multi-Family (CMU, RC, Village Districts)			
<i>Minimum</i>	Studios: 0.5 spaces minimum per unit 1 Bedroom: 1 space minimum per unit 2 Bedroom: 1.5 spaces minimum per unit 3 Bedroom or more: 2 spaces per unit		
<i>Maximum</i>	2 spaces per unit + 0.5 spaces per unit for guest parking		
Nursing/Convalescent	One space per four beds		
Student Housing	One space per five beds		

Source: City of Belmont Planning Department, Zoning Ordinance.

While parking standards are not currently constraining multi-family residential development in Belmont, the City anticipated the possibility of parking constraining development at a future time and put policies in place to address that possibility. The BVSP identified shared Downtown parking facilities as a development preference to consolidate parking in the Belmont Villages, and to offer relief to developers of small parcels. Additionally, housing built as part of a mixed-use project within 300 feet of a train station, or within the Belmont Village area, may receive a 15% reduction in the required parking spaces. Housing developers have regularly received a parking reduction as a regulatory incentive for Density Bonus projects. It is important to note that AB2097 dramatically changed the regulatory scheme for parking near transit. All of the BVSP area is within ½ mile of the Caltrain station, so no parking is required for housing projects in those districts.

Nearly all R-3 and R-4 properties in Belmont are already developed or entitled with higher-density residential housing—including existing parking spaces—and are unlikely to be redeveloped with new housing projects. There are only two smaller parcels zoned R-3 that are vacant and do not have development entitlements. The requirement for one covered and one uncovered parking space for units in the R-3 and R-4 zoning districts is not likely to constrain any new housing development activity during the next planning period. The City contains two

small clusters of parcels zoned R-2 Duplex Residential, all of which have been developed with housing and are not likely to be redeveloped during the next planning period.

While the existing parking standards do not constrain housing development, the City has added Program H4.4, Reduce Parking Requirements, which directs the City to modify the parking requirements in the R-2, R-3, and R-4 zoning districts to reduce parking requirements consistent with other multi-family zoning districts (CMU and Village districts). It should also be noted that large majority of R-2, R-3, and R-4 properties are located within ½-mile of public transit and are not subject to minimum parking standards under AB 2097.

SINGLE-FAMILY RESIDENTIAL DESIGN STANDARDS

In 2011, the City adopted Single-family Residential Design Guidelines which provide clear guidance to property owners and developers on compliance with both property development standards, as well as the entitlement findings that must be made for approval of a Single-Family Residential Design Review project. The Guidelines have proven to be very useful in clarifying the City's expectations for development of Single-family Residential properties.

In 2014, the Belmont City Council established a subcommittee to review the single-family development standards and design review process to determine whether revisions would be appropriate to help streamline the development and permitting process for single-family residential development and improvement projects. This subcommittee conducted a survey of several adjacent communities to compare development standards.

One of the conclusions from this survey was that Belmont's setback and parking requirements are inconsistent and inflexible, not allowing for exceptions to be made to address common scenarios that exist within Belmont's single-family residential neighborhoods. In 2018, the City adopted amended design review regulations for single-family and duplex residential development, offering updated objective design standards. These regulations, as augmented by the Residential Design Guidelines, provide a more simple, predictable, and consistent framework for review of residential projects, and allow for more improvement projects to be approved administratively by the Zoning Administrator. Since 2018, Belmont has seen an increase in single-family residential improvement projects.

ON- AND OFF-SITE IMPROVEMENTS

As the majority of Belmont is built out, new housing developments are not required to complete the vast infrastructure improvements that may be needed in more rural communities. Most new housing development occurs on lots served by an existing network of streets and utility infrastructure. The Belmont Municipal Code and the Belmont Subdivision Ordinance provide details for on- and off-site infrastructure improvements that are required for new development in Belmont. Additionally, the Belmont Village Specific Plan, the Ralston Avenue Corridor Study, the Alameda de las Pulgas/San Carlos Avenue Corridor Study, and the

Comprehensive Pedestrian and Bicycle Plan identify infrastructure improvements that are necessary throughout the city to ensure safe transportation and quality of life.

The Public Works Department has developed detailed engineering standards and conditions that work in combination with the Municipal Code and adopted plans to ensure minimum levels of design and construction quality are maintained and adequate levels of street improvements are provided to serve new development. Per these adopted regulatory documents, minimum right-of-way widths in most of the city are already established and vary depending upon the street typology (i.e., highways, arterials, collectors, or local streets as defined in the Belmont General Plan).

The most common improvements for a typical new residential development include upgrading sewer mains as needed if they are aged or insufficient to meet needed capacity due to the new development, upgrading water mains as needed if they are aged or insufficient to meet fire safety requirements, restoration of streets surrounding the development site, and reconstruction of frontages when necessary to accommodate the new development project. New subdivisions are required to construct sidewalks if none exist and where there are existing sidewalks, the sidewalks are evaluated and required to meet current sidewalk standards, including ADA requirements.

For infill developments, exceptions may be reviewed and considered by the City's Public Works Director on a case-by-case basis as part of the City's development review process, provided that the alternative design meets safety and ADA requirements. The street design guidelines and standards have a potential to affect housing costs; however, they are necessary to provide a minimum level of design and construction quality in the city's neighborhoods, ensure the community's ability to access housing developments and maneuver around it on safe surfaces, and meet ADA requirements. From an equity standpoint, the minimum standards help to ensure that improvements are of a consistent quality regardless of the average income in the neighborhood.

The on- and off-site improvement standards imposed by the City are typical for most communities and do not pose unusual constraints for housing development. While these improvements may increase the cost of development, it is important to note that adequate sewer, water, street, and accessible sidewalk infrastructure are a necessary component of a healthy, equitable, and productive city. Additionally, conditions of approval to complete on- and off-site improvements are provided to applicants in a timely manner and do not have a significant impact on project timing.

INCLUSIONARY ZONING REQUIREMENTS

In 2017, Belmont adopted an inclusionary housing ordinance requiring certain residential and non-residential developments to mitigate project impacts on the local need for more affordable housing. Prior to ordinance adoption, the City participated in the San Mateo Countywide Grand Nexus Study that provided the technical and legal justification for an inclusionary housing requirement (Table 4-9).

4. CONSTRAINTS

TABLE 4-9: INCLUSIONARY ZONING REQUIREMENTS AND FEES

Project Tyle	Requirement	Alternative Means of Compliance
Large Ownership Projects (25+ Units)	15% Moderate Sale	15% Low Rental
Small Ownership Projects (< 25 units)	Mitigation Fee (\$25/sf)	15% Moderate Sale, or 15% Low Rental
Large Rental Projects (25+ Units)	15% Low	n/a
Small Rental Projects (< 25 units)	In Lieu Fee (\$25/sf)	15% Low Rental
Non-Residential Projects	Mitigation Fee (\$25/sf)	Mitigation Fee
Mixed Use Projects	Proportional	Proportional

Notes:

- The number of affordable units required is calculated based on the number of dwelling units in the residential project, excluding any density bonus units (inclusionary amount determined by base allowed density, developer must submit base density calculation along with density bonus request).
- The Housing Mitigation Fees are adjusted annually by City Council with adoption of the Master Revenue Schedule.
Projects Exempt from Inclusionary Requirements:
 - One unit on an existing lot;
 - Accessory dwelling units (ADU);
 - Property owned by the State of California;
 - Projects operated by non-profit organizations to provide food storage, meal service, or temporary shelter to homeless;
 - Non-residential projects involving no more than one employee; and
 - Any non-residential project otherwise determined to be exempt by the City Council.

Source: City of Belmont Planning Department.

The City prepares an annual financial report of all development impact and in-lieu fees, including the inclusionary housing fees paid by projects with less than 25 units (Housing Mitigation fees). The Fiscal Year 2022-23 Development Fees Annual Report reflected a fund balance of \$2,571,617, including loans receivable totaling \$2,351,473, for an available cash balance of \$220,144. In FY 2023-24, the City has collected \$599,866 in inclusionary housing fees to date from the Firehouse Square Phase II project. The City does not anticipate any additional inclusionary housing payments this year.

With a total of 1,023 housing units currently as pending and pipeline projects (508 under construction or recently completed, 306 units approved, and 209 in development review), the City has not seen any discernable constraint of the inclusionary housing ordinance on housing production since the inclusionary ordinance was adopted in 2017. In part, this is because developers can receive substantial density increases through the State Density Bonus Program. In addition, the discontinuance of the density metric incentivizes developers to include more units than previously permitted. With clear requirements and guidelines, a template regulatory agreement, and experienced planning staff, the process of implementing the ordinance and ensuring developers comply with the requirements has been smooth.

Housing Program H2.2, Manage Portfolio of Deed Restricted Affordable Units, directs the City to seek and retain a housing service provider to manage the increasing portfolio of restricted affordable housing units to ensure ongoing compliance. Housing Element Program H5.3, Modify the Inclusionary Housing Program, directs the City to modify the inclusionary housing ordinance to incentivize lower-income housing units (extremely low and very low).

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 various types of housing for all economic segments of the population. This includes single-family housing, multi-family housing, factory-built housing, mobile homes, emergency shelters, and transitional housing, among other housing types.

A review of the City's Zoning Code shows that many types of housing are permitted in the community. The following analyzes the City's allowance of various housing types.

MULTI-FAMILY HOUSING

In Belmont, multi-family units comprise approximately 36% of the existing housing stock. Multi-family residential uses are allowed by right (no CUP required) in the R-3 and R-4 residential zones. Duplexes are permitted by right in the R-2, R-3, and R-4 and conditionally permitted in the Village High-density Residential (VHDR) district, where higher-density housing is typically preferred. Clustered dwelling units and townhomes are permitted in the Hillside Residential & Open Space (HRO) zoning districts with approval of a CUP; this requirement is appropriate given the challenging hillside terrain, vegetation, and access issues that exist for HRO properties in Belmont.

MIXED-USE DISTRICTS

Multi-family residential housing developments are the foundation of the vision for the Belmont Village districts and CMU district along El Camino Real. The City seeks a vibrant, walkable district around the Caltrain Station with sufficient commercial uses to support the residents. To support that vision, the City permits residential uses on the upper floors as a permitted use and requires a Conditional Use Permit (CUP) to allow residential on the ground floor of those buildings. Specifically, in the Belmont Village zoning districts, a CUP is only required if a residential use in the portion of the project within 60 feet of a public street; residential uses are allowed on the remainder of the first floor. In the CMU district the regulations require a CUP if residential uses are proposed anywhere on the ground floor, but would be looked at favorably if the portion near the street is commercial while the rear of the first floor is used for residential uses. If a housing project has a mixed-use component, with a commercial use on the ground floor, then a CUP is not required. The CUP findings were written to support the vision for the area while not acting as a deterrent to residential development. To make this determination, the Planning Commission must consider whether:

- the layout and street orientation of the site are conducive for the operation of ground floor commercial;
- the project would replace an existing retail or restaurant use on-site;
- there are existing commercial uses within ¼ mile of that project that would meet the needs of the building occupants; and
- if the project would provide 30% or more units of affordable housing.

4. CONSTRAINTS

The City has a strong record of completed and approved multi-family developments, even with the CUP requirement for housing on the ground floor. The requirement for a commercial use on the ground floor has been implemented in a reasonable way through the development review process. Recent projects include a traditional commercial space such as a quick serve restaurant or small retail space, or a flex/community space on the ground floor. For the 100% affordable projects recently approved, the City has encouraged the more active uses, such as the leasing office or community space, that are designed to activate the streetscape in lieu of a commercial space.

With strong housing production/development trends in the mixed-use districts, the City has not found the CUP requirement to be a constraint to residential development. As described in *Chapter 6, Adequate Sites*, the housing opportunity sites in the CMU and Village zoning districts are anticipated to continue supporting residential development.

The mixed-use districts in Belmont allow commercial uses as well as residential; however, the market demand for non-residential development in the Belmont Village area is low and the City has not had any applications approved for 100% commercial uses in these districts since the adoption of the General Plan and Belmont Village Specific Plan in 2017. In the CMU district, the only commercial proposal the City has received is a preliminary plan to demolish an existing motel and build a new hotel at the same location. Due to market dynamics and the physical layout of the mixed-use districts, it is unlikely that non-residential uses would outperform residential uses and act as an impediment to housing production.

In the Belmont Village and CMU districts, retail and restaurant uses are allowed but are expected to be located on the ground floor of multi-story buildings and are therefore not an impediment to housing production. Office uses are allowed in these districts but it is unlikely that major office uses would locate in the mixed-use districts because there are other locations in the City that are better suited for major office development. Since 2017, there have been no proposals for office development in these areas, even before the slowdown in office demand resulting from the COVID-19 pandemic. Smaller, locally serving office may develop over time but the City has not received any proposals for those types of uses since 2017. The City expects demand for research and development uses in other parts of the City but that use is not allowed in the mixed-use districts (other than one district, where a CUP is required). The small lot size and more constrained street pattern are not conducive to research and development uses in this area. Therefore, the City does not anticipate receiving applications for 100% commercial projects in the mixed-use zones. Program H4.9 commits the City to monitor commercial development in mixed-use zones and make necessary changes if trends change during the planning period.

As shown in Table 4-10, there are six projects and 670 units in the Village and CMU zoning districts, which demonstrates demand and conducive development standards for residential development.

TABLE 4-10: PIPELINE AND PENDING PROJECT IN MIXED-USE DISTRICTS

Address	Ground Floor Use	Total Units	Zoning	Status
Firehouse Square 1	Retail/Community	66	VC	Completed 2023
Firehouse Square 2	Residential	15	VC	Completed 2024
815 Old County Road	Leasing Office/Community	177	VCS	Completed 2024
1325 Old County Road	Community/Flex	250	VCMU	Completed 2024
803 Belmont Avenue	Leasing Office/Community	125	CMU	Approved
Hill Street at El Camino Real	Leasing Office/Community	37	BVSP	Approved
TOTAL		670		

Source: City of Belmont, 2024.

EMERGENCY SHELTERS

An emergency shelter is any facility with overnight sleeping accommodations, the primary purpose of which is to provide temporary shelter for the homeless, in general, or for specific populations of homeless persons. The length of stay can range from one night up to six months. In Belmont, emergency shelters are permitted by right in the S-2 Emergency Shelter overlay district, which includes 31 parcels in the CMU zoning district.

The purpose of the S-2 Emergency Shelter overlay district is to ensure that certain qualifying shelters with 16 or fewer beds can be built with no subjective entitlement review (building permit only) and are obligated to meet the basic performance standards related to client intake, hours of operation, services provided, kitchen, sanitation, storage, and security. The emergency shelter structures must meet the development regulations of the underlying CMU zoning district, which will be amended to eliminate the residential density maximum.

The S-2 district is located a short walk from Downtown Belmont, close to both the Caltrain station and the El Camino Real transit corridor, allowing easy access to social services and retail to meet daily needs. Permitted uses in the CMU district include both retail and residential in a compact, pedestrian-oriented setting. Enhanced multi-modal transportation options serve the CMU and S-2 districts.

Two parcels in the S-2 Emergency Shelter overlay district are included on the Sites Inventory, both of which are more than one acre in size and have the capacity to accommodate a large number of new housing units, including lower-income units. The City of Belmont's existing requirements for the location of shelters includes the following.

21.3 S-2 EMERGENCY SHELTER COMBINING DISTRICT

(a) S-2 District Established. The S-2 Emergency Shelter combining district comprises that certain area situated within the City of Belmont and described on the following map is an S-2 district. The City of Belmont Zoning Map was amended to include the S-2 district as shown in Figure 4.4.

4. CONSTRAINTS

(b) S-2 District Purpose. The purpose of the S-2 Emergency Shelter combining district is to establish a district with sufficient capacity to accommodate the need for emergency shelters where emergency shelters are permitted without a conditional use permit or other discretionary action, as required by Government Code Section 65583.

(c) Emergency Shelter Defined. "Emergency Shelter" is defined by Health and Safety Code section 50801(e) and does not include: (i) transitional housing or (ii) temporary shelter provided by general relief in the wake of a disaster.

Figure 4-4: S-2 Emergency Shelter Combining District



(d) Permitted and Conditionally Permitted Emergency Shelter Uses.

(1) Permitted Use. Emergency shelters are permitted within the S-2 district without a conditional use permit or other discretionary review when:

- (A) The shelter has sixteen (16) or fewer beds serving no more than sixteen (16) homeless persons at one time and
- (B) The cumulative number of either emergency shelter beds or persons served at one time in the S-2 district does not exceed sixteen (16).

(2) Conditionally Permitted Use. An emergency shelter within the S-2 district with more beds or serving more people than the cumulative number of beds or persons served at one time in subsection (d)(1)(B) requires a conditional use permit.

(e) Development Regulations. An emergency shelter shall conform to all development regulations of the zoning district in which it is located, except off-street parking shall be provided as set forth in the table below. The Community Development Director may reduce the parking requirement if the shelter can demonstrate a lower need. All required parking spaces and access thereto shall conform to the City parking design standards. Modifications to the development regulations of the underlying zoning district may be permitted subject to approval of a conditional use permit by the Planning Commission.

TABLE 4-11: PARKING STANDARDS FOR EMERGENCY SHELTERS

Type	Parking Spaces	
Vehicular	Per employee or volunteer on duty when the shelter is open to clients	1 space
	Per family	0.50 space
	Per non-family bed	0.25 space
Bicycle	Per bed	0.25 space

Source: Zoning Ordinance; City of Belmont Planning Department.

(f) Performance Standards. Emergency shelters shall conform to the following performance standards. A modification to a performance standard may be permitted subject to approval of a conditional use permit.

(1) **Waiting and Client Intake Areas**. Shelters shall provide ten (10) square feet of on-site, interior waiting and client intake space per bed. In addition, one (1) office or cubicle shall be provided per ten (10) beds, with at least one (1) office or up to 25% of the offices designed for client privacy. Waiting and intake areas may be used for other purposes as needed during operations of the shelter.

(2) **Facility Requirements**. Each facility shall have a written management plan that uses best practices to address homeless needs (e.g., quality assurance standards developed by the San Mateo County HOPE Quality Improvement Project) which shall include, at a minimum, the following.

(A) **On-Site Management**. On-site personnel are required during hours of operation when clients are present.

(B) **Hours of Operation**. Facilities shall establish and maintain set hours for client intake and discharge. The hours of operation shall be consistent with the services provided and be clearly posted.

(C) **Services**. Facilities shall provide overnight accommodation and meals for clients. Staffing and services or transportation to such services shall be provided to assist clients to obtain permanent shelter and income.

(D) **Kitchen**. Each facility shall provide a common kitchen and dining area.

(E) **Sanitation**. Each facility shall provide restrooms and shower facilities for client use.

(F) **Storage**. Each facility shall provide a secure area for storage of client personal property.

(G) **Coordination**. The shelter operator shall establish a liaison staff to coordinate with city, police, school district officials, local businesses, and residents on issues related to the operation of the facility.

(H) **Exterior Security Lighting**. Adequate external lighting shall be provided for security purposes. The lighting shall be sufficient to provide illumination and clear visibility to all outdoor areas, with minimal spillover on adjacent properties. The lighting shall be stationary, directed away from adjacent properties and public rights-of-way, and compatible with the neighborhood.

(I) **Security**. On-site security shall be provided during the hours of operation when clients are present.

4. CONSTRAINTS

(g) Compliance Review Procedures. An emergency shelter facility shall be reviewed for compliance with all development regulations and performance standards prior to occupancy of the facility, where a use permit is not required.

(1) Request for Compliance Review. Requests for compliance review shall be made in writing by the owner of the property, lessee, purchaser in escrow, or optionee with the consent of the owners. The request shall be accompanied by a project description explaining the details of the proposal, and both site and building floor plans.

(2) Compliance Determination. The Community Development Director or designee shall make a determination of compliance in writing after reviewing the request materials and considering any comments received. The determination of the community development director is final and not subject to appeal.

Based on analysis of these requirements against those of AB 2339 and other provisions of State law, the City's current emergency shelter requirements contain constraints that will be eliminated through amended policies in this Housing Element. The constraints found include the following.

1. The definition of emergency shelters does not include associated uses such as low barrier navigation centers, bridge housing, respite/recuperative care, and other inclusive terms for shelters.
2. The parking requirements address more than staff parking, and do not reflect the requirements of AB 139.

The following standard is not currently a constraint, but could be in the future, and therefore will be amended as outlined in Program H4.2. Zoning Code Amendments to Remove Constraints.

1. The 16-bed maximum for by-right approval, which currently covers the number of Belmont's homeless population as counted in the biennial homeless counts, would not cover potential increases over time, as shown in the growth of that population over the last five years. In 2017, there were three unsheltered persons, seven in 2019, and 13 in 2022. Given this trend, the City commits to increasing the maximum number of beds by-right to 20, with a mid-cycle review to determine any changes that might be needed to the City's bed limit. Based on this proposed increase, it is presumed that the square footage needed would be 4,000 square feet. As the density maximums are also being removed from this zone, the size would not be a constraint. It should be noted that a CUP would still be required for larger developments greater than 20 beds.

Additional requirements that are not constraints include the following.

1. Requirements for waiting rooms.
2. Provision of onsite management. This presumes that hours of operation, services, kitchen facilities, sanitation, storage facilities, coordination requirements, and ongoing compliance review are included in onsite management provisions.
3. Lighting.
4. Security.

This Housing Element includes Program H4.2 Zoning Code Amendments to Reduce Constraints, includes actions to amend the Zoning Ordinance to address the identified constraints.

TRANSITIONAL AND SUPPORTIVE HOUSING

Transitional housing is defined as a project that is designed to provide housing and appropriate support services to homeless persons to facilitate movement to independent living within 24 months. Transitional housing may also be used for youth leaving the foster care system.

Supportive housing is defined as long-term community-based housing and supportive services for persons with special needs. The intent of this type of housing is to enable these special needs populations to live as independently as possible in a permanent setting.

The Belmont Zoning Ordinance includes definitions of both transitional and supportive housing and clarifies that both are considered a permitted residential use and only subject to those restrictions that apply to other residential dwellings in the same zone. Housing Element Program H4.3, Zoning Code Amendments to Remove Constraints, identifies an action to evaluate the Zoning Ordinance and update as needed to comply with AB 2162 and related State laws.

APARTMENT HOTEL, EFFICIENCY UNITS, OR SINGLE ROOM OCCUPANCY UNITS

Apartment hotel, efficiency units, or single room occupancy (SRO) units are a type of housing that serves very low-income households. The Belmont Zoning Ordinance defines this type of housing as a dwelling unit containing only one habitable room for occupancy by no more than two (2) persons and containing a minimum of 220 square feet of living space. These units are considered a residential use and subject only to those restrictions that apply to other residential dwellings of the same type in the same zone.

MANUFACTURED HOUSING AND MOBILE HOME PARKS

State housing law requires communities to allow manufactured housing by right in all residential zones, and to allow mobile home parks as a special use in all residential zones (Government Code Section 65852.7). In Belmont, manufactured housing is allowed in all residential zones subject to the same objective design review requirements as site-built housing. The Belmont Zoning Ordinance permits mobile home parks in the M-1 manufacturing zone with a Conditional Use Permit.

Housing Element Program H4.3, Zoning Code Amendments to Remove Constraints, identifies an action for the City to amend the Zoning Ordinance to allow mobile home parks as a special use in all residential zones, consistent with State law.

ACCESSORY DWELLING UNITS

Accessory dwelling units (ADUs) are a source of housing units that is often lower cost to develop, occurs in established and high-resourced neighborhoods, and offers naturally

affordable units based on size. The City complies with State law requirements for the processing of ADUs and has seen an increase in ADU production as State law has become more permissive. In the year 2018, the City issued a total of eight ADU building permits. By 2022, the number increased to 27. In 2023, the numbers remained high at 21 building permits issued. Belmont has not identified any constraints to ADU development but has identified ways to further encourage ADU and JADU production as well as support housing mobility for lower income households. The City has included Programs H5.9, Conduct Zoning Code Amendments to Facilitate Production of ADUs and SB9 Units; H5.10, Provide Financial Support for ADUs that Serve Lower-Income Households; and H5.11, Conduct Outreach to Encourage ADU and SB9 Unit Production.

HOUSING FOR PERSONS WITH DISABILITIES

Fair Housing Law prohibits local governments from making housing opportunities unavailable to people with disabilities through discriminatory land use and zoning rules or other policies and procedures. Persons with disabilities are significantly more likely than other people to live with unrelated people in group housing, and therefore the definition of “family” can be a constraint to housing for persons with disabilities. While the City’s Zoning Ordinance definition of “Family” was updated to remove outdated references to traditional family or blood relationships, the current definition still refers to a group of individuals with an “internally structured relationship providing organization and stability.” The City has added Program H4.3, Zoning Code Amendments to Remove Constraints, to update the Zoning Ordinance to further update the definition of “Family” to remove the reference to “internally structured relationship” and instead define a family as one or more persons living together in a dwelling unit, with common access to, and common use of all living, kitchen, and eating areas within the dwelling unit. This will remove a potential governmental constraint to housing persons with disabilities.

The siting of group homes is another common constraint to housing for persons with disabilities. State law requires that certain community care facilities serving six or fewer persons be permitted by right in residential zones. Moreover, such facilities cannot be subject to requirements (development standards, fees, etc.) more stringent than single-family homes in the same district. The Zoning Ordinance has been amended to provide definitions for “residential care facilities” and “small residential care facilities” (those serving six or fewer clients), and to clarify that a nursing or convalescent home is considered a residential care facility.

The revised Zoning Ordinance further clarifies that small residential care facilities are a residential use permitted in any residential zone, while large residential care facilities are currently permitted in residential zoning districts with approval of a CUP. Requiring a CUP for larger facilities serving seven or more persons with a disability is a potential governmental constraint.

Program H4.3, Zoning Code Amendments to Remove Constraints, also directs the City to eliminate the CUP requirement for all residential care facilities, regardless of size, and to allow

these types of housing facilities in all zoning districts that allow residential uses based on objective criteria. This will bring the Zoning Ordinance into consistency with State law and would remove a potential governmental constraint to housing persons with disabilities.

REASONABLE ACCOMMODATIONS

A reasonable accommodation is a change, exception, or adjustment to a rule, policy, practice, or service. The Fair Housing Act makes it unlawful to refuse to make reasonable accommodations when such accommodations may be necessary to afford persons with disabilities an equal opportunity to use and enjoy a dwelling and public and common use areas. In addition, the Fair Housing Act prohibits a housing provider from refusing to permit, at the expense of the person with a disability, reasonable modifications of existing premises occupied or to be occupied by such person if such modifications may be necessary to afford such person full enjoyment of the premises.

Requests for the installations of ramps or interior modifications are typically processed over the counter and do not require any special review. Prior to issuance of a building permit, the applicant must submit plans, which are reviewed by City staff. Applicants may remodel, add up to 400 square feet, or add exterior ramps with only ministerial approval and without a public hearing.

Belmont Zoning Ordinance Section 10 defines a simple procedure for residents to request reasonable accommodations for persons with disabilities seeking equal access to housing under the Federal Fair Housing Act and the California Fair Employment and Housing Act. The Ordinance clearly defines application requirements and permitting procedures for residents seeking these types of accommodations to ensure such requests can be efficiently processed. Requests made for a reasonable accommodation without any accompanying application for another approval--permit or entitlement--are reviewed administratively by the Community Development Director within 45 days. An application for reasonable accommodation shall be granted if the following findings are made:

1. The housing, which is the subject of the request, will be used by an individual disabled under the Federal Fair Housing Act and the California Fair Employment and Housing Act.
2. The requested reasonable accommodation is necessary to make specific housing available to an individual with a disability under the Federal Fair Housing Act and the California Fair Employment and Housing Act.
3. The requested reasonable accommodation would not impose an undue financial or administrative burden on the City.
4. The requested reasonable accommodation would not require a fundamental alteration in the nature of a City program or law, including but not limited to land use and zoning.
5. The requested reasonable accommodation would not adversely impact surrounding properties or use.

6. There are no reasonable alternatives that would provide an equivalent level of benefit without requiring a modification or exception to the City's applicable rules, standards, and practices. (b) In granting a request for reasonable accommodation, the approving authority may impose any conditions of approval deemed reasonable and necessary to ensure that the reasonable accommodation would comply with the findings required by subsection (a).

BUILDING CODES AND ENFORCEMENT

A variety of federal, State, and local building and safety codes are adopted for the purpose of preserving public health and safety, as well as ensuring the construction of safe and decent housing. At times, code requirements increase the cost of such housing. However, these codes are not considered a specific constraint on development in Belmont since all projects must comply, other jurisdictions in the region have adopted similar codes, and the purpose of the codes is to protect public health and safety. The codes the City has adopted, and other codes with which all projects must comply, include building codes, accessibility standards, energy standards, specific codes to reduce hazards, and other related ordinances.

LOCAL PROCESSING AND PERMIT PROCEDURES

TYPICAL PROCESSING TIMES

Table 4-12 describes the typical amount of time needed for various types of residential projects to be reviewed. The development review process can take 2 to 6 months for a new single-family home and 5 to 14 months for multi-family projects. Nearly all recently approved multi-family residential projects were able to reduce environmental review by utilizing the Belmont General Plan Environmental Impact Report (EIR) adopted by the City in 2017, which has significantly reduced development review processing times. For all project types, it takes the Community Development Department 30 days to determine if an application is complete. To facilitate the process, City staff meet with applicants in advance of application to review submittal requirements to increase likelihood of complete applications. If applicants do not submit the materials requested, the timeline can increase by several months.

If a multi-family developer is requesting a zone change or Planned Development (PD) to allow for more flexible development standards, the rezoning process can take up to 18 months. In most instances, multiple entitlements can be processed simultaneously to streamline the review process. For example, in November 2021 the City Council concurrently approved a multi-family residential site rezoning, conceptual development plan, detailed development plan, Conditional Use Permit, and design review at a single meeting. In addition to the zone change, there may be a variety of other issues to consider such as CEQA review, slope, grading, drainage, and/or geotechnical issues, or the existence of protected trees. The zone change combined with several of these additional issues could extend the development review process to 9 to 18 months.

TABLE 4-12: RESIDENTIAL PROJECT DEVELOPMENT REVIEW TIME FRAMES

Development Type	Approval Type	Approving Authority	Time Frame for Review (Days) ^a		
			Determine Completeness of Application	Determine Environmental Review ^b	Maximum Time to Approve/Disapprove Project ^c
Single-Family					
Tier 1 – Less than 400 sf, or carport enclosures/additions that do not increase footprint	Building Permit	Building Official		N/A	45
Tier 2 – Less than 900 sf	Design Review	Zoning Administrator	30		45-60
Tier 3 – New homes, grading < 500 cy, additions > 900 sf, CEQA Required	Design Review	Planning Commission		30	60-120
Multi-Family					
EIR Required	Design Review;	Planning			270-360
Negative Declaration Required	CUP for housing on the ground	Commission; City Council Required for	30	30	120-240
CEQA Exempt	floor in CMU or village districts	Development Agreements			90-180
Accessory Dwelling Units (ADUs)					
ADU Applications Meeting All Ministerial Standards	Building Permit	Building Official	10	N/A	45

^a Times listed for approval/disapproval do not take the time needed for any type of zoning amendment, such as the use of the PD district, into account.

^b Time required to determine whether an environmental impact report, negative declaration, or mitigated negative declaration shall be required.

^c Maximum time required to act (approve or disapprove a permit application) from the date environmental review is complete or the determination of categorical exemption is made.

Source: Belmont Planning Department.

The 2015-2023 Housing Element implemented a program that (1) eliminates any time used to determine the level of environmental review for secondary dwelling units, as these are generally CEQA-exempt; (2) caps the number of days needed to act on a CEQA-exempt single-family unit permit application to 60 days; and, (3) caps the number of days needed to act on a multi-family permit application that requires an EIR to 180 days (90 days if the project requires an EIR and at least 49% of the units are affordable), and to 60 days if the project requires a Negative Declaration or is CEQA-exempt.

To provide clear and efficient information on both the City website and in-person at the Permit Center, the City has developed new handouts, including a “Frequently Asked Questions” document. These documents have been extremely well received by the public.

DESIGN REVIEW

A Design Review Permit from the Planning Commission is required for multi-family housing development projects. The City’s findings for a Design Review Permit for housing projects are consistent with SB330 (Housing Crisis Act) and AB678 and SB167 (Housing Accountability Act),

4. CONSTRAINTS

which require that local jurisdictions utilize a ministerial and streamlined process for specified housing projects; this streamlined process requires objective development standards to address a variety of design concerns that were typically resolved during a discretionary process in the past.

Government Code Section 65913.4 (5) defines objective standards as:

"Standards that involve no personal or subjective judgement by a public official and are uniformly verifiable by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant or proponent, and the public official prior to submittal."

In accordance with the requirements of state law, a ministerial process for review of qualifying housing development projects has been included in Belmont Zoning Ordinance Section 13.5.1 (Design Review). The required findings are directly from State law and read in the negative, as the review authority is required to approve the project unless the findings can be made.

(a) The reviewing body must approve or conditionally approve Design Review for a project that is defined as a "Housing Development Project" by the Housing Accountability Act (Government Code Section 65589.5(h)(2)) unless it makes one of the following findings supported by a preponderance of the evidence in the record:

- 1. The project does not comply with all applicable objective general plan, zoning, subdivision, and development standards including objective design review standards.*
- 2. The project would result in a specific adverse impact to public health and safety that cannot be feasibly mitigated without denying the project or reducing its density.*

These are the only findings for multi-family design review. There is no subjective analysis in the design review process.

Belmont has a Tiered System of review for the Single-Family Design Review (SFDR) process. The level of review (tier) is dependent on the scope of the project. For example, small ground floor additions are reviewed at a staff level. Larger ground floor additions and upper floor additions are reviewed by the Zoning Administrator. New single-family homes and large upper floor additions are reviewed by the Planning Commission.

Belmont's Residential Design Criteria (RDC) is a companion document to the Zoning Ordinance, which provides additional, objective, measurable, or quantifiable review criteria required for new construction. The RDC includes relevant criteria for the regulation of building bulk (such as second story step backs, prescribed articulation, and daylight planes), which are specified based upon the scope of the project, site conditions, and the architectural style of the home. New homes and additions must comply with the RDC if the new construction: (a) includes a ground floor plate height that exceeds 12 feet or a roof height that exceeds 18 feet (as measured from finished grade), or (b) creates or expands an upper floor. The RDC standards are available on the City's website:

<https://www.belmont.gov/home/showpublisheddocument/13391/635973497473800000>.

All new single-family residential structures, and additions must be consistent with the City's established Residential Design Guidelines (RDG). The RDG include basic design concepts and elements of good design. The purpose of the RDG is to provide clear guidance to property owners and developers. They help applicants prepare project plans by: 1) providing an overview of the SFDR Findings that the review authority must make in order to approve a project; and 2) providing relevant examples of designs that are in general agreement with the SFDR Findings. The RDG have proven very useful in clarifying the City's expectations for development of single-family residential properties and have helped streamline the entitlement review process by reducing the number of non-compliance or incomplete items.

The Multi-Family objective design standards, RDG, updated zoning standards, and simplified residential design review process have ensured that applicants, community members, City Council, Planning Commission, and City staff know the review criteria and understand the applicable design review principles at the outset of a project, helping to streamline and add more clarity to the project review process. The City currently has 1,023 housing units as pending and pipeline projects and expects to receive several more large housing project applications during the planning period. Therefore, the City concludes that the design review process is not a constraint to housing development. Clear and objective zoning standards, guidelines, and experienced staff have made the Design Review process more streamlined for developers.

CONDITIONAL USE PERMITS

Multi-family residential uses on the ground floor in the CMU or Village Districts require a CUP granted by the Planning Commission. Multi-family residential uses above the ground floor in these districts, and in other residential zoning districts, are permitted by right. Please see the discussion under the Zoning for a Variety of Housing Types – Mixed-Use Districts subheading earlier in this chapter. If a CUP is required, it is processed concurrently with the design review and does not add to the approval timeline.

ENVIRONMENTAL REVIEW

The City facilitates environmental review as required by CEQA. To streamline new development, the City certified a Program Environmental Impact Report (EIR) for the comprehensive General Plan Update, Belmont Village Specific Plan and Climate Action Plan in 2017. The certification of that Program EIR allows the City to process most housing projects under Section 15183 of the CEQA Guidelines. Environmental analysis is limited to consistency with the General Plan EIR, associated Mitigation Measures, and requirements of Guidelines Section 15183. This approach has resulted in significant streamlining of housing projects. Additionally, SB35 procedures require a ministerial process without CEQA review for certain affordable housing projects. If a project does require a Negative Declaration, Environmental Impact Report, or other form of CEQA documentation, the City follows Public Resources Code 21080.1 and 21080.2, related to processing times.

SENATE BILL 35 APPROVAL PROCESS

Senate Bill (SB) 35, passed in 2017, requires jurisdictions that have not approved enough housing projects to meet their RHNA to provide a streamlined, ministerial entitlement process for housing developments that incorporate affordable housing. Per SB 35, the review and approval of proposed projects with at least 50% affordability must be based on objective standards and cannot be based on subjective design guidelines. However, to be eligible, projects must also meet a long list of other criteria, including prevailing wage requirements.

For applicants to take advantage of SB 35, per Government Code Section 65913.4(10)(b)(1)(a)(et seq.), they must submit a Notice of Intent and jurisdictions need to give Native American tribes an opportunity for consultation. In 2020, the City of Belmont amended the Zoning Ordinance to ensure that only objective development standards are utilized in analysis of housing projects, and to establish a ministerial review process for qualifying housing projects. Belmont eliminated the requirement for a Conditional Use Permit for new multi-family housing constructed within a multi-family district. These steps further streamline the pre-application and design review process to introduce efficiencies during planning application reviews.

The City of Belmont has identified Housing Element Program H4.6, Update the City's Webpage to Provide Enhanced Information for Housing Developers, to update the City website with information and resources for SB 35 streamlined ministerial review, including provision of a Notice of Intent form and information about the process, making it easy for developers to consider this option. The City processed its first SB 35 streamlined development application for a 37-unit 100% affordable project on El Camino Real at Hill Street and the project was approved in February 2023. As of May 2024, the City is processing an SB35 project for a 100% affordable housing project at 678 Ralston Avenue.

SENATE BILL 330 PROCESS

Senate Bill (SB) 330, Housing Crisis Act of 2019, prohibits cities and counties from enacting a development policy, standard, or condition that would impose or enforce design standards that are not objective on or after January 1, 2020 [Government Code Section 663300 (b)(C)]. SB 330 also established specific requirements and limitations on development application procedures.

Per SB 330, housing developers may submit a "preliminary application" for a residential development project. This allows a developer to provide a specific subset of information on the proposed development before providing the full information required by the local government for a housing development application. Submittal of the preliminary application secures the applicable development standards and fees adopted at that time. The project is considered vested, and all fees and standards are frozen, unless the project changes substantially.

The City of Belmont has developed a preliminary application form consistent with SB 330. In addition, the bill limits the application review process to 30 days for projects less than 150 units,

and 60 days for projects greater than 150 units, with no more than five public hearings, including Planning Commission, design review, and City Council.

SB 330 also prohibits cities and counties from enacting a development policy, standard, or condition that would have the effect of: (A) changing the land use designation or zoning to a less intensive use or reducing the intensity of land use within an existing zoning district below what was allowed on January 1, 2018; (B) imposing or enforcing a moratorium on housing development; (C) imposing or enforcing new design standards established on or after January 1, 2020, that are not objective design standards; or (D) establishing or implementing certain limits on the number of permits issued.

DEVELOPMENT COSTS, FEES, AND EXACTIONS

Belmont collects planning and development fees to cover the cost of processing permits and providing the necessary services and infrastructure related to new development. Permit processing fees are intended to reimburse the City for actual administrative costs. Fees are imposed by the Planning, Building, and Public Works Departments. Table 4-13 summarizes fees charged to developers of recently permitted residential projects in Belmont.

Table 4-13 indicates that total fees for a 3-bedroom, 2,180 square-foot single-family residential unit would be approximately \$58,394, approximately 3% of the estimated total development costs. The planning and building fees account for 2% of the total costs for a new single-family house. This is typical given almost all the few remaining, vacant single-family residential lots in Belmont are constrained by steep slopes, limited access, or heavy vegetation and will likely require geologic and engineering review.

The total fees per unit for multi-family residential apartment projects range from approximately \$38,881 per unit in a 66-unit project, down to \$28,575 per unit in a larger 250-unit project. These fees represent 4% to 6% of the total estimated development costs for these projects. Planning and building fees account for 3% to 4% of the total costs for new multi-family residential development projects, while the development impact, in-lieu, and mitigation fees account for approximately 1% of total development costs.

In 2022, *Community Planning Collaborative* engaged *Century|Urban* to perform research on the development costs of certain residential prototypes in San Mateo and Santa Clara Counties. Table 4-14 compares Belmont's total fees development per unit for both single- and multi-family residential to the average total fees per unit for all jurisdictions in San Mateo County. In both categories, the City of Belmont is nominally above average. Given the number of new construction housing units currently as pending or pipeline projects (508 under construction, 306 with approved entitlements, and 209 in development review), Belmont's total development fees per unit do not appear to be a constraint to housing development.

4. CONSTRAINTS

TABLE 4-13: EXAMPLE RESIDENTIAL PROJECT DEVELOPMENT FEES

	Single-Family Dwelling 55 Ralston Ranch	Multi-Family Apartment		
		1300 El Camino Real (Firehouse Square 1) 100% Affordable	1325 Old County Road 15% Affordable	815 Old County Road 15% Affordable
Project Assumptions				
Project Size (units)	1	66	250	177
Living Area per Unit (sf)	2,180	1,106	898	868
Building Size (sf)	2,180	72,978	224,468	153,685
Average Construction Cost/Unit	\$1,040,000	\$453,472	\$240,013	\$223,292
Average Land Cost/Unit	\$960,583	\$123,000	\$123,000	\$123,000
Average Soft Costs (non-fees)	\$270,000	\$120,000	\$120,000	\$120,000
Project Valuation	\$300,000	\$29,929,181	\$60,003,296	\$39,522,730
Project Fees Charged				
Total Development Review/Planning Fees (Including CEQA)	\$10,104	\$120,413	\$61,207	\$58,382
Total Building Permits & Fees	\$33,771	\$1,879,892	\$5,156,200	\$3,512,757
Total Planning & Building Fees	\$43,875	\$2,000,305	\$5,217,407	\$3,571,139
Planning & Building Fees per Unit	\$43,875	\$30,308	\$20,870	\$20,176
Planning & Building Fees as Proportion of Development Cost	2%	4%	3%	3%
Total Impact Fees	\$14,519	\$565,871	\$1,926,336	\$2,770,118
Impact Fees per Unit	\$14,519	\$8,574	\$7,705	\$15,650
Impact Fees as Proportion of Development Cost	1%	1%	1%	2%
Total Fees	\$58,394	\$2,566,176	\$7,143,743	\$6,341,257
Total Fees per Unit	\$58,394	\$38,881	\$28,575	\$35,826
Total Fees as Proportion of Total Development Cost	3%	6%	4%	5%
Total Development Costs	\$2,328,977	\$46,324,176	\$167,893,743	\$120,152,257

Source: City of Belmont, December 2022

TABLE 4-14: TOTAL DEVELOPMENT FEES PER UNIT

	Single-Family	Percentage of Total Development Costs	Large Multi-Family	Percentage of Total Development Costs
City of Belmont (see Table 4-13 for details)	\$58,394	3%	\$28,575	4%
San Mateo Countywide (Average)	\$55,433	2%	\$25,319	3%

Source: City of Belmont, December 2022; Century Urban "San Mateo and Santa Clara Counties Development Costs," April 2022; Community Planning Collaborative, April 2022.

The City offers programs to mitigate the impact of development fees on affordable housing. In 1990, the City passed a resolution that allows the Planning Director to waive fees for non-profit developers who provide affordable housing units. Recently approved projects providing affordable housing units have also successfully negotiated deferred submittal of certain development fees to help with project financing. In 2020 and 2021, the Belmont City Council held study sessions to review development impact and in-lieu fees and confirmed that Belmont had fees in place that were consistent with and not higher than the median of surrounding jurisdictions. Therefore, development impact, in-lieu, and mitigation fees are not considered to be a constraint to housing development in San Mateo County.

The City follows new transparency requirements for posting all zoning and development standards and fees for each parcel on the jurisdiction's website, pursuant to Government Code section 65940.1(a)(1). The City also maintains a wide variety of development information online, including development standards and all fees. A current schedule of fees and inclusionary affordability requirements can be accessed on the City's website at www.belmont.gov/finance. Table 4-15 summarizes housing development fees in effect for Fiscal Year 2023.

OTHER LOCAL CONSTRAINTS

INFRASTRUCTURE CONSTRAINTS

The City's water service is provided by the Mid-Peninsula Water District which supplies water to consumers in an area slightly larger than the city limits of the City of Belmont. Small portions of the service area are within the City Limits of the City of San Carlos, Redwood City, and parts of the unincorporated County of San Mateo. The District's service territory covers approximately five square miles and serves approximately 28,000 people. In the event of an emergency the district can serve or be served with inter-ties between neighboring utilities, as of today the district has one inter-tie with Foster City, three with San Carlos, one with Redwood City, and three with San Mateo. The City coordinates closely with the Mid-Peninsula Water District to ensure they are aware of projected development and the resultant service growth demand.

The City's wastewater treatment is primarily provided by Silicon Valley Clean Water (SVCW). SVCW serves more than 220,000 people and businesses in their service area. By effectively treating wastewater at an advanced, two-stage biological treatment facility, SVCW helps keep the public and San Francisco Bay environmentally clean and safe. Sewage arrives at the treatment facility through a series of pipelines and pump stations. The sewage then passes through physical, chemical, and biological treatment processes, which results in high quality effluent being discharged to the deep-water channel of the San Francisco Bay.

4. CONSTRAINTS

TABLE 4-15: BELMONT NEW RESIDENTIAL DEVELOPMENT FEES FY 2022-2023

	Single-Family	Multi-Family
Development Review/Planning Fees		
SB 330 Preliminary Review	\$311/hr	\$311/hr
Planning Review	\$6,252	\$10,950 deposit + \$311/hr
Engineering Review	\$5,900	\$4,948 deposit + \$380/hr
Geologic Review	\$6,921	\$6,921
Environmental Review – CEQA		
Categorical Exemption Fee	\$311	\$311
Initial Study/Neg. Dec. (staff time)	N/A	\$18,158
Mitigated Negative Declaration	N/A	\$21,426 (plus contract cost)
Public Notice Fee	\$328	\$328
EIR (Plus Consultant)	N/A	\$40,221 (plus contract cost)
Other Development Review Fees (As Applicable)		
Tentative Parcel Map	N/A	\$27,617
General Plan/Zoning Amendment	N/A	\$16,153
Lot Line Adjustment/Consolidation	N/A	\$6,043
Variance and FAR Exception	\$10,950	\$10,950
Conditional Use Permit	N/A	\$2,951–\$10,329
Parcel Map	N/A	\$11,443 +\$311/hr
Final Map	N/A	\$17,879+\$311/hr
Building Permits and Fees		
Building Fee basis	\$11,929+ \$4.63/1000 sf	\$11,929+ \$4.63/1000 sf
Building Plan Check	65% of building fee basis	65% of building fee basis
Engineering Plan Check	\$5,697 +\$358/hr	\$5,697 +\$358/hr
Noise Insulation	N/A	8% of building fee basis
Planning Plan Check	35% of building fee basis	35% of building fee basis
Accessibility Plan Check	25% of building fee basis	25% of building fee basis
Fire Plan Check	\$155	\$938-\$1,566
Electrical Permit	\$159	\$159
Mechanical Permit	\$162	\$162
Plumbing Permit	\$161	\$161
Inspection Fees	\$311/hr	\$311/hr
Grading Permit	\$1,073 +\$3/CY(over 50 CY)	\$1,073 +\$3/CY(over 50 CY)
Other Fees		
General Plan Maintenance Fee	0.75% of building valuation	0.75% of building valuation
Electronic Document Fee	5% of building fee basis	5% of building fee basis
NPDES Inspection Fee	\$1,073	\$1,073-\$10,728

	Single-Family	Multi-Family
SBSA (Sewer) Connection Fee	\$12,025	\$12,025/unit
State Energy (Title 24)	25% of building fee basis	25% of building fee basis
Impact Fees		
Park Development Impact Fee	\$14,242	\$9,495 per unit
Parkland In-Lieu Fee (Quimby)	\$41,043	\$27,362 per unit
Transportation Impact Fee	\$7,697	\$5,974 per unit
Public Art In-Lieu Fee	1% building valuation	1% building valuation
Housing Mitigation Fee	\$25/sf	\$26/sf
School Fees	\$6.14/sf	\$6.14/sf

Source: City of Belmont FY 2022-2023 Fee Schedule.

It is anticipated that the City has adequate capacity to meet demand and adequate capacity to expand to meet projected development as part of the Housing Element. Current facilities and/or infrastructure are reported to be in good operating condition. Larger housing development projects may require the installation of utility infrastructure to accommodate individual project impacts, including water main lines, upsized sewer lines, and/or additional lateral connections within the city. Infrastructure installations necessary to serve future development would generally be installed within the already disturbed rights-of-way of existing roads or within the disturbance footprints of development projects. Implementation of proposed capital improvement projects for the SVCW treatment plant would ensure adequate capacity to serve projected demand.

A copy of the updated Housing Element and growth projections is provided to utility providers to ensure long term service planning and capital improvements will provide sufficient capacity to accommodate the City's regional housing need for the planning period.

4. CONSTRAINTS

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5

RESOURCES

This section analyzes resources available for the development, rehabilitation, and preservation of housing in Belmont, including organizations and agencies, financial sources, regulatory assets, and resources for energy conservation. The inventory of land resources suitable for housing can be found in *Section 6, Adequate Sites*.

5.1 ADMINISTRATIVE RESOURCES

The following agencies and organizations contribute to the goal of preserving and increasing affordable housing in Belmont. Both government agencies and partnerships with nonprofit agencies and for-profit developers are necessary to implement many housing programs.

CITY OF BELMONT

The City of Belmont provides administrative services, housing, and community development services to residents, developers, and others interested in housing issues. In addition, the City is responsible for oversight of the housing assets of the former Redevelopment Agency.

HOUSING AUTHORITY OF THE COUNTY OF SAN MATEO (HACSM)

The City does not operate its own housing authority but is served by the Housing Authority of the County of San Mateo (HACSM), which provides rental subsidies and manages and develops affordable housing for low-income families, seniors, and persons with disabilities in the County. It administers approximately 4,500 vouchers through the Housing Choice Voucher Program (Section 8) and offers rental assistance for 180 units through the Project Based Voucher Program.

SAN MATEO COUNTY

San Mateo County contracts with Project Sentinel to handle complaints of discrimination in the sale or rental of housing and for the mediation of tenant/landlord disputes. San Mateo County also has several local enforcement organizations including the Legal Aid Society of San Mateo County and Community Legal Services of East Palo Alto. These organizations receive funding from the County and participating jurisdictions to support fair housing enforcement and outreach and education in the County. The fair housing services include investigations and enforcement in response to reports of housing discrimination complaints, as well as independent testing of rental properties for signs of discrimination in rental practices. As part of this Housing Element update, the City will improve access to fair housing information on its website, including comprehensive housing related information and materials for low-income households seeking housing opportunities, and coordinate with providers to market programs electronically (see Program H5.1). In addition, the City of Belmont will perform fair housing training in partnership with Project Sentinel for landlords and tenants across the region to promote housing mobility (see Program H5.5).

LOCAL NON-PROFIT RESOURCES

A number of non-profit organizations and support agencies currently work across San Mateo County and have been active in Belmont. These agencies serve as resources in meeting the housing needs of the County and are integral in implementing activities for preservation of assisted housing and development of affordable housing, as well as creating safe and healthy places for all economic segments of the community. These organizations include but are not limited to the list below.

- HIP Housing
- HEART of San Mateo County
- Peninsula Habitat for Humanity
- First Community Housing
- MidPen Housing
- Rebuilding Together Peninsula

5.2 FINANCIAL RESOURCES

The City's housing programs are funded through a variety of state and federal sources. These funds actively support fair housing choice, improving the housing stock, and protecting housing affordability in Belmont and throughout the region. This section offers a summary of funding sources that are currently available in Belmont, as well as additional funding sources that are potentially available to support various housing programs.

CITY FUNDS

HOUSING SUCCESSOR AGENCY

The primary local source of funds for affordable housing in Belmont has traditionally been the former Redevelopment Agency's Low- and Moderate-Income Housing Fund. However, due to passage of Assembly Bill (AB) 126, redevelopment agencies across California were eliminated as of February 1, 2012, removing the primary local tool for creating affordable housing. With the subsequent passage of AB 1484 in June 2012, the Supplemental Educational Revenue Augmentation Funds (SERAF) borrowed by the State from Redevelopment Agencies' Low- and Moderate-Income Housing Funds were required to be repaid and deposited into each Housing Successor Agency's Housing Asset Fund. As part of the fiscal year 2023 budget, the Belmont Housing Successor Agency committed \$3.5 million to support the 803 Belmont Avenue 100% affordable housing project.

The City expects to receive approximately \$4,000,000 in its Low- and Moderate-Income Housing Asset Fund in fiscal year 2024, primarily from the repayment of a loan for the Firehouse Square project. The Housing Successor Agency intends to contribute all revenues towards the development of 100% affordable housing projects, including \$1 million that has been committed for the development of the affordable project at Hill Street and El Camino by LINC Housing.

RESIDENTIAL HOUSING MITIGATION FEES

In 2017, the City adopted an ordinance establishing housing mitigation fees on the construction of new residential projects to mitigate the burdens created by these new projects on the need for extremely low-, very low-, low- and moderate-income housing and to increase and preserve the supply of housing affordable to households of extremely low, very low, low and moderate incomes.

COMMERCIAL DEVELOPMENT LINKAGE FEES

In 2017, the City adopted an ordinance establishing a commercial linkage fee. The fee is collected when a building permit for a non-residential use is issued and is to be used for the creation and preservation of affordable housing. It is calculated by using the gross floor area of net new commercial space, excluding structured parking. Fee rates are adjusted annually using the construction cost index, but the City maintains three tiers of pricing for the fee, with "retail/service" at the least expensive, "hotel" at middle pricing, and "office/research" at the highest rates. The City has not received any commercial linkage fee to date but several large-scale commercial projects are in the development pipeline that if constructed, will be required to pay these fees.

INCLUSIONARY HOUSING IN-LIEU FEES

The City Council Ordinance 2017-1126, adopted in 2017, established an inclusionary zoning fee for small for-sale residential projects of fewer than 25 units in-lieu of providing an alternative, as defined in the Ordinance. If in-lieu fees are levied, they are the same as the residential development mitigation fee. As of fiscal year 2023, City currently has roughly \$600,000 in in-lieu housing fees in the fund that are anticipated to be used to support affordable housing development and Housing Element program implementation.

COUNTY FUNDS

COMMUNITY DEVELOPMENT BLOCK GRANTS (CDBG)

San Mateo County is an Entitlement jurisdiction under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant (CDBG) Program. As such, the County receives funding from HUD on an annual basis and can provide grants to non-profit and governmental agencies to develop viable urban communities through the provision of services to the low- and moderate-income community. Programs and services include development of housing for persons with special needs; services to the elderly, those with disabilities, and children; expanding economic opportunities; and public improvements.

HOME INVESTMENT PARTNERSHIP PROGRAM

The HOME program is a federal grant that is also determined by formula allocations. HOME funds are directed toward the housing programs that assist persons at or below 60% of the median income, including acquisition, rehabilitation, new construction, tenant-based assistance, homebuyer assistance, planning, and supportive services. Funding for this program is allocated to San Mateo County for projects in all non-entitlement areas, including Belmont.

EMERGENCY SOLUTIONS GRANTS (ESG)

Emergency Solutions Grant (ESG) funds are used to provide shelter and related services to the homeless. The San Mateo County Department of Conservation and Development (DCD) coordinates the allocation of ESG funds with the County's Homeless Program Office and the Continuum of Care (CoC) Board.

OTHER FUNDING SOURCES

Table 5-1 identifies additional funding federal and state resources for affordable housing activities, including but not limited to new construction, acquisition, rehabilitation, and homebuyer assistance.

TABLE 5-1: OTHER PUBLIC FUNDING SOURCES

Federal Programs	
Brownfields Grant Funding Program	Resources available for the cleanup of eligible publicly- or privately held properties to facilitate the reuse/redevelopment of contaminated sites.
Choice Neighborhoods Implementation Grant Program	Support the implementation of comprehensive plans expected to revitalize public and/or assisted housing and facilitate neighborhood improvements.
Community Facilities Direct Loan & Grant Program	Provides affordable funding to develop essential community facilities in rural areas.
Continuum of Care (CoC) Program	Funding is available on an annual basis through HUD to quickly rehouse homeless individuals and families.
Farm Labor Housing Direct Loans & Grants (Section 514)	Provides affordable financing to develop housing for domestic farm laborers.
Housing Choice Vouchers	The government's major program for assisting very low-income families, the elderly, and the disabled to afford housing through rental subsidies that pays the difference between the current fair market rent and what a tenant can afford to pay (e.g., 30% of their income).
Home Ownership for People Everywhere (HOPE)	Provides grants to low-income people to achieve homeownership.
Housing Opportunities for Persons with AIDS (HOPWA)	Funds are made available countywide for supportive social services, affordable housing development, and rental assistance to persons living with HIV/AIDS.
Housing Preservation Grants	Grants to sponsoring organizations for the repair or rehabilitation of housing owned or occupied by low- and very-low-income rural citizens.
Low-Income Housing Tax Credit (LIHTC) Program	Tax credits for the for the acquisition, rehabilitation, or new construction of rental housing for lower-income households. Project equity is raised through the sale of tax benefits to investors. 4% and 9% credits available.
Rural Rental Housing: Direct Loans	Direct loans for construction or rehabilitation of affordable, rural multi-family rental housing.
Section 108 Loan Guarantee Program	Loans to CDBG entitlement jurisdictions for capital improvement projects that benefit low- and moderate-income persons.
HUD Section 202 Supportive Housing for the Elderly Program	Interest-free capital advance to private, non-profit sponsors to cover the costs of construction, rehabilitation, or acquisition of very low-income senior housing.
HUD Section 221(d)(3) and 221(d)(4)	Insures loans for construction or substantial rehabilitation of multi-family rental, cooperative, and single-room occupancy housing.
Section 502 Direct Loan Program	USDA Section 502 Direct Loan Program provides homeownership opportunities for low- and very-low-income families living in rural areas.

5. RESOURCES

State Programs	
Affordable Housing and Sustainable Communities Program (AHSC)	Funds land use, housing, transportation, and land preservation projects that support infill and compact development and GHG emissions.
CalHome	Grants to local public agencies and non-profits to assist first-time homebuyers become or remain homeowners through deferred-payment loans. Funds can also be used for ADU/JADU assistance (i.e., construction, repair, reconstruction, or rehabilitation).
CalHFA Residential Development Loan Program	Loans to cities for affordable, infill, owner-occupied housing developments.
Cleanup Loans and Environmental Assistance to Neighborhoods (CLEAN) Program	Department of Toxic Substances Control program that provides low-interest loans to investigate, cleanup, and redevelop abandoned and underutilized urban properties.
California Emergency Solutions and Housing (CESH)	Grants for activities to assist persons experiencing or at-risk of homelessness.
California Self-Help Housing Program	Grants for sponsor organizations that provide technical assistance for low- and moderate-income families to build their homes with their own labor.
Community Development Block Grant-Corona Virus (CDBG-CV ₁) – CARES Act Funding	A subsidiary of the CDBG program that provides relief to eligible entities due to hardship caused by COVID-19.
Emergency Housing Assistance Program (EHAP)	Funds for emergency shelter, transitional housing, and related services for the homeless and those at risk of losing their housing.
Golden State Acquisition Fund (GSAF)	Short-term loans (up to five-years) to developers for affordable housing acquisition or preservation.
Homekey	Grants to acquire and rehabilitate a variety of housing types (e.g., hotels, motels, vacant apartment buildings) to serve people experiencing homelessness or who are also at risk of serious illness from COVID-19.
Homeless Emergency Aid Program (HEAP)	\$500 million block grant program designed to provide direct assistance to cities, counties and CoCs to address the homelessness crisis.
Homeless, Housing Assistance and Prevention (HHAP) Program	HHAP Round 1: \$650 million grant to local jurisdictions to support regional coordination and expand or develop local capacity to address immediate homelessness challenges. Round 2: \$300 million grant that provides support to continue to build on regional collaboration to develop a unified regional response to homelessness.
Housing for a Healthy California (HHC)	Funding for supportive housing opportunities intended to create supportive housing for individuals who are recipients of or eligible for health provided through Medi-Cal.

Housing Navigators Program	\$5 million in funding to counties for the support of housing navigators to help young adults aged 18 to 21 secure and maintain housing, with priority given to young adults in the foster care system.
Housing-Related Parks Program	Funds the creation of new park and recreation facilities or improvement of existing park and recreation facilities that are associated with rental and ownership projects that are affordable to very low- and low-income households.
Infill Infrastructure Grant Program (IIG)	Grant funding for infrastructure improvements for new infill housing in residential and/or mixed-use projects.
Joe Serna, Jr., Farmworker Housing Grant (FWHG)	Grants and loans for development or rehabilitation of rental and owner-occupied housing for agricultural workers with priority for lower-income households.
Local Early Action Planning (LEAP) Grants	Assists cities and counties to plan for housing through providing one-time, non-competitive planning grants.
Local Housing Trust Fund Program (LHTF)	Lending for construction of rental housing projects with units restricted for at least 55 years to households earning less than 60%AMI. State funds match local housing trust funds as down-payment assistance to first-time homebuyers.
Mobile-home Park Rehabilitation and Resident Ownership Program (MPRROP)	Low-interest loans for the preservation of affordable mobile-home parks.
Mortgage Credit Certificate (MCC) Program	Income tax credits to first-time homebuyers to buy new or existing homes.
Multi-family Housing Program (MHP)	Low-interest, long-term deferred-payment permanent loans for new construction, rehabilitation, and preservation of permanent and transitional rental housing for lower-income households.
No Place Like Home	Invests in the development of permanent supportive housing for persons who need mental health services and are experiencing homelessness or chronic homelessness, or at risk of chronic homelessness.
Office of Migrant Services (OMS)	Provides grants to local government agencies that contract with HCD to operate OMS centers throughout the state for the construction, rehabilitation, maintenance, and operation of seasonal rental housing for migrant farmworkers.
Permanent Local Housing Allocation Program (PLHA)	Grants (competitive for non-entitlement jurisdictions) available to cities to assist in increasing the supply of affordable rental and ownership housing, facilitate housing affordability, and ensure geographic equity in the distribution of funds.
Predevelopment Loan Program (PDLP)	Short-term loans to cities and non-profit developers for the continued preservation, construction, rehabilitation, or conversion of assisted housing primarily for low-income households.
Regional Early Action Planning (REAP) Grants	Grant funding is intended to help COGs and other regional entities collaborate on projects that have a broader regional impact on housing.

5. RESOURCES

SB 2 Planning Grants Program	One-time funding and technical assistance to help local governments adopt and implement plans and process improvements that streamline housing approvals and accelerate housing production.
Supportive Housing Multi-Family Housing Program (SHMHP)	Low-interest loans to developers of permanent affordable rental housing that contain supportive housing units.
Transformative Climate Communities (TCC) Program	Competitive grants for planning and implementation of community-led development and infrastructure projects that achieve major environmental, health, and economic benefits in the state's most disadvantaged communities.
Transit Oriented Development Housing Program (TOD)	Low-interest loans and grants for rental housing that includes affordable units near transit.
Transitional Housing Program (THP)	Funding to counties for child welfare services agencies to help young adults aged 18 to 25 find and maintain housing, with priority given to those previously in the foster care or probation systems.
Veterans Housing and Homelessness Prevention Program (VHHP)	Long-term loans for development or preservation of rental housing for very low- and low-income veterans and their families.
Workforce Housing Program	Government bonds issued to cities to acquire and convert market-rate apartments to housing affordable to moderate-income households, generally households earning 80% to 120% of AMI.

Source: City of Belmont, 2024.

5.3 ENERGY CONSERVATION OPPORTUNITIES

The State of California is a nationwide leader in sustainable building practices. Written into the State Building Code are several sets of requirements and guidelines to facilitate the production of more environmentally friendly buildings. These requirements are updated every three years. The most recent version, the 2019 California Building Standards Code took effect on January 1, 2020. Title 24, Part 6, of the California Code of Regulations (Building Energy Efficiency Standards for Residential and Nonresidential Buildings) contains building standards that provide for energy efficiency and focus on four key areas: smart residential photovoltaic systems, updated thermal envelope standards, residential and nonresidential ventilation requirements, and nonresidential lighting requirements.

The City of Belmont requires compliance with the 2019 California Building Code for all new construction. The City amends the Code as needed to further define requirements based on the unique local conditions of Belmont and to assist the City in meeting our sustainability goals. The Code is designed to protect the public health, safety, and welfare of Belmont's residents. Compliance with the California Building Code on the use of energy efficient appliances and insulation has reduced energy demand stemming from new residential development.

LOCAL AND REGIONAL PROGRAMS

The Bay Area Regional Energy Network (BAYREN) is a coalition of the Bay Area's nine counties working to promote resource efficiency at the regional level, focusing on energy, water, and greenhouse gas reduction. BAYREN provides rebates and financing for a variety of energy upgrades and works in partnership with PG&E (the local utility provider) and Peninsula Clean Energy (the local Community Choice Aggregation program) to offer financial and energy-related assistance programs for its low-income customers, including:

- **Relief for Energy Assistance through Community Help (REACH).** The REACH program helps low-income qualified customers who experience uncontrollable or unforeseen financial hardships.
- **Low Income Home Energy Assistance Program (LIHEAP).** This federally funded program provides financial assistance to help offset eligible household's energy costs, including heating, cooling, and home weatherization expenses.
- **CARE/FEA Discount Programs.** CARE and FEA help eligible customers pay their energy bills. A monthly discount is applied on electricity and/or gas for eligible households.
- **Medical Baseline Allowance.** Customers who are eligible for Medical Baseline receive an additional allotment of electricity and/or gas per month. This helps to ensure that more energy to support qualifying medical devices is available at a lower rate.
- **Vulnerable Customer Program.** The Vulnerable Customer Program was designed to help address the needs of our customers whose life or health would be at risk should their electric or gas service be disconnected. Customers who self-certify that they have a serious illness or condition that could become life threatening if their electric or gas service is disconnected for nonpayment will receive an in-person visit from a PG&E representative before disconnection.
- **Home Upgrade Program.** This program provides income-qualified homeowners with home repairs and energy efficiency upgrades at no cost.

5. RESOURCES

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6

ADEQUATE SITES

State Housing Element Law (Government Code Sections 65583(a)(3)) requires that jurisdictions demonstrate their availability of adequate land resources to accommodate their “fair share” of regional housing needs. Jurisdictions must demonstrate that these land resources have the appropriate site characteristics and development regulations required to accommodate their community’s housing needs as identified by the State Department of Housing and Community Development (HCD) and the Bay Area’s regional governing body, the Association of Bay Area Governments (ABAG). Land resources identified as suitable for potential future accommodation of residential development throughout the planning period are referred to as a “Sites Inventory.” This section describes the land resources which have been identified for inclusion in the City’s Sites Inventory.



Firehouse Square 1 located at 1300 El Camino Real

The chapter starts with a description of the City’s housing target for the 2023-2031 planning period called the Regional Housing Needs Allocation (RHNA). It then describes pipeline and pending projects and presents the methodology for developing the sites inventory, including an analysis of recent development trends that provided guidance for selecting housing opportunity sites, anticipated Accessory Dwelling Units (ADUs), and vacant and non-vacant sites where housing is an allowed use. It then provides an analysis of each of the identified suitable sites and the factors that make them likely to develop during this planning period. The analysis in this chapter demonstrates that there is an adequate supply of suitable land to accommodate the City’s RHNA housing allocation of 1,785 units, including housing for very low- and low-income households.

6.1 REGIONAL HOUSING NEEDS ALLOCATION (RHNA)

RHNA is the State-required process that seeks to ensure each California jurisdiction is planning for enough housing capacity to accommodate their “fair share” of the state’s housing needs for all economic segments of the community. The RHNA process for the nine-county Bay Area is described below.

- **Regional Determination.** The HCD provided the Association of Bay Area Governments (ABAG) with a Regional Housing Needs Determination of **441,176 units**. This is the number of units the Bay Area must plan for between 2023 and 2031. It represents the number of additional units needed to accommodate the anticipated growth in the number of households, to replace expected demolitions and conversions of housing units to non-housing uses, and to achieve a future vacancy rate that allows for healthy functioning of the housing market. The Regional Housing Needs Determination for the first time ever also included adjustments related to the rate of overcrowding and the share of cost-burdened households, which resulted in a significantly higher number of housing units for which the Bay Area must plan compared to previous RHNA cycles.
- **RHNA Methodology.** ABAG developed a RHNA methodology to allocate the Regional Housing Needs Determination across all cities, towns, and counties in the region. The RHNA methodology must be consistent with State objectives, including but not limited to promoting infill, equity, and environmental protection; ensuring jobs-housing balance; and affirmatively furthering fair housing. The allocation also considers factors such as employment opportunities, the availability of suitable sites and public facilities, commuting patterns, and type and tenure of housing need. ABAG developed the RHNA methodology in conjunction with a committee of elected officials, jurisdictional staff, and related stakeholders called the Housing Methodology Committee. More information about ABAG’s RHNA methodology is available at <https://abag.ca.gov/our-work/housing/rhna-regional-housing-needs-allocation>.
- **Housing Element Updates.** Each jurisdiction must adopt a Housing Element that demonstrates how it can accommodate its assigned RHNA for each income category through its zoning. HCD reviews each jurisdiction’s Housing Element for compliance with State law. Belmont’s Housing Element must demonstrate capacity to accommodate **1,785 units** as further described below.

BELMONT’S “FAIR SHARE”

In determining a jurisdiction’s share of new housing needs, ABAG splits each jurisdiction’s allocation into four income categories:

- Very Low-Income – 0% to 50% of Area Median Income (AMI)
- Low-Income – 51% to 80% of AMI
- Moderate-Income – 81% to 120% of AMI
- Above Moderate-Income – more than 120% of AMI

The AMI in San Mateo County for a family of four is \$175,000. How this breaks down into income categories for Belmont is shown in Table 6-1. Where this Housing Element refers to housing that is affordable to the different income levels shown above, this means that a household spends **no more than 30% of their income on housing**.

TABLE 6-1: RHNA AFFORDABILITY LEVELS IN BELMONT

Affordability Level	Percent of AMI	Belmont Household Income ^a
Very Low-Income	≤ 50%	< \$87,500
Low-Income	51-80%	\$87,501 - \$140,000
Moderate-Income	81-120%	\$140,001 – \$210,000
Above Moderate-Income	> 120%	> \$210,000

Note: AMI = Area Median Income, Household incomes based on San Mateo County's 2023 AMI of \$175,000 for a 4-person household.

^a Household incomes are for households/families of four.

Source: CA HCD, Division of Policy Development, State Income Limits 2023.

In December 2021, ABAG identified the City of Belmont's fair share of the region's housing needs as 1,785 new housing units, as shown in Table 6-2. This allocation represents a planning goal by requiring the City to demonstrate sufficient development capacity through the identification of potential sites and zoning to facilitate the RHNA during the planning period.

TABLE 6-2: BELMONT RHNA

Income Category	RHNA	Percent of RHNA
Very Low-Income (0-50% of AMI)	488	27%
Low-Income (50-80% of AMI)	281	16%
Moderate-Income (80-120% of AMI)	283	16%
Above Moderate-Income (120% or more of AMI)	733	41%
Total	1,785	100%

Source: Housing Element Cycle 6 RHNA Allocation.

In addition, each jurisdiction must also address the projected need of extremely low-income households, defined as households earning 30% or less of AMI. The projected extremely low-income need is assumed to be 50% of the total RHNA need for the very low-income category. As such, there is a projected need for 244 extremely low-income housing units.

6.2 PROGRESS TOWARDS THE RHNA

Per HCD guidance, housing units that are proposed, approved, or under construction are counted towards the current RHNA so long as a Certificate of Occupancy is not issued before the projection period start date, which is June 30, 2022. Projects that receive a Certificate of Occupancy before June 30, 2022, count towards the previous RHNA cycle. Belmont's pipeline projects are described below. The City is also processing three pending projects, which have been submitted but not yet approved. The City is committed to a timely public review process to facilitate all pipeline and pending projects and will follow all applicable State Laws (see Program H1.5: Facilitate Pipeline and Pending Projects).

Additionally, per HCD guidance, a community may also credit the number of ADUs that are anticipated to be developed during the 6th Cycle Housing Element planning period toward its RHNA requirements. The forecasted development of ADUs during the planning period must be based on an analysis of prior years' building permit data and local development regulations that promote ADU development. The City of Belmont's anticipated ADU development over the course of the 2023-2031 planning period is discussed in more detail below.

PIPELINE PROJECTS

As noted above, projects that have been approved, permitted (since June 30, 2022), or received a certificate of occupancy (in 2023) since the beginning of the RHNA projected period may be credited toward meeting the RHNA allocation based on the affordability and unit count of the development. For these projects, affordability is based on the actual or projected sale prices, rent levels, or other mechanisms establishing affordability in the planning period of the units within the project. Table 6-3 summarizes all pipeline and pending housing development projects, the affordability level of the units, and the affordability mechanism, if applicable. These projects are either under construction or have received entitlement approval.

As indicated in Table 6-3, four pipeline multi-family housing projects have completed construction and will be occupied by Spring 2024. These projects include:

- Firehouse Square 1
- Firehouse Square 2
- 815 Old County Road
- 1325 Old County Road

The following is a more detailed summary of the status of the remaining pipeline projects. The City anticipates that all of these projects will be constructed and occupied during the RHNA 6 planning period and will establish Program H1.5: Facilitate Pipeline and Pending Projects to support these projects through completion (see *Chapter 7, Housing Goals, Policies, and Programs*).

- **803 Belmont Avenue** – This project is a 100% affordable project. Entitlements were approved in May 2022. In addition, the City committed \$3.5 million in Affordable Housing Funds to support the project. The project was awarded \$14 million of San Mateo County Affordable Housing Funds in September 2022 and CTAC/CDLAC funding in May 2023. Construction commenced in May 2024.
- **608 Harbor Blvd.** – Entitlement approvals were granted in June 2023 and the City and San Mateo County completed the LAFCo annexation process in early 2024. Construction is anticipated to begin in 2025.
- **Hill Street at El Camino Real** – This project is a 100% affordable project. Entitlement approvals and a Disposition Development and Loan Agreement (DDLA) with Linc Housing for project development were approved in February 2023. The project is in the process of applying for low-income housing tax credit financing and, if awarded, will start construction in late 2025 or 2026.

TABLE 6-3: PIPELINE AND PENDING PROJECTS AFFORDABILITY OVERVIEW

	Very Low- Income	Low- Income	Moderate- Income	Above Moderate- Income	Total Units	Affordability Mechanism	Status
Pipeline Projects							
Firehouse Square 1	46	19	0	1	66	City/County AHF; TCAC	Completed 2023
Firehouse Square 2	0	0	0	15	15	n/a	Completed 2024
815 Old County Road	0	27	0	150	177	Inclusionary	Completed 2024
1325 Old County Road	0	38	0	212	250	Inclusionary	Completed 2024
803 Belmont Avenue	63	61	0	1	125	City/Council AHF; TCAC	Construction
608 Harbor Boulevard	0	16	0	87	103	Inclusionary	Approved
Hill Street at El Camino Real	22	14	0	1	37	City/County AHF; TCAC	Approved
800 Laurel Avenue	0	0	0	16	16	n/a	Approved
Single-Family Homes	0	0	0	4	4	n/a	Approved
ADUs	0	0	21	0	21	n/a	Approved
PIPELINE SUBTOTAL	131	175	21	487	814		
Pending Projects							
580 Masonic Way	11	0	11	117	139	Inclusionary	Applied
1477 El Camino Real	0	1	0	4	5	n/a	Applied
678 Ralston Avenue	52	12	0	1	65	County; TCAC	Applied
PENDING SUBTOTAL	63	13	11	122	209		
TOTAL	194	188	32	609	1,023		

Note: TCAC = Tax Credit Allocation Committee; AHF = Affordable Housing Funds
Source: City of Belmont, 2024.

- **800 Laurel Avenue** – Entitlement approvals for 16 market rate units were approved in December 2021. The applicant applied for building permits but encountered technical issues related to the undergrounding of utilities. They have been working with PG&E and the City to resolve those issues. As of April 2024, the issues are resolved and they are proceeding with the building permit review process. Construction is anticipated to begin in 2025.
- **Single-Family Residential Units and ADUs** – A total of four single-family homes and 21 ADUs were permitted in 2023. These projects are on various timelines but the City anticipates construction of these units to commence in 2024.

PENDING PROJECTS

The residential projects that have yet to be approved but will likely be developed during the 2023-2031 planning period are referred to as “Pending Projects” and are described below and included in Table 6-3. These pending projects total 209 residential units:

6. ADEQUATE SITES

- **580 Masonic Way** – Project application was submitted in May 2021 for 139 units, including 11 very low-income units and 11 moderate income units. The project was on hold while the developer worked through legal challenges related to private site covenants but as of April 2024 they are moving forward again with an updated entitlement application. The project is an allowable use and the City anticipates the project will complete its entitlement process in early 2025 and will be constructed during the planning period. The project site was included in the 2015-2023 Housing Element and was required to be rezoned to accommodate the RHNA allocation for the site. As a result, the site is eligible for by-right approvals if the proposed project includes 20% low-income units. The current application for the site includes 15% very low-income units and 15% moderate income units.
- **1477 El Camino Real** – Project application for a five-unit market rate residential project was submitted in July 2020. This is physically constrained site that relies on a joint use access easement with Caltrain for parking. The applicant has been working through these issues and modified the project in 2023. The City expects the project will be entitled and constructed during the planning period.
- **678 Ralston Ave** – Project application was originally submitted in December 2023 for a 65-unit 100% affordable project pursuant to SB 35. The applicant withdrew the application, made revisions, and resubmitted the project in early 2024. The City expects the project to be approved ministerially in 2024. The project has secured funding from San Mateo County and will apply for tax credit financing. Construction timing will depend on the award of tax credit financing but is expected to occur in the middle of the planning period.

ACCESSORY DWELLING UNITS

The State allows jurisdictions to count projected development of ADUs based on prior years' production averages. Substantial changes in State law pertaining to ADUs in the last several years have made it much easier for homeowners to create ADUs throughout Belmont. With no formal affordability mechanisms or tracking in place for ADUs, Belmont has historically considered ADUs to be moderate-income units based on unit size limitations.

Table 6-4 below includes an analysis of the City of Belmont's issuance of building permits for ADUs between the years 2018 to 2023. During that time period, the number of ADUs developed has significantly increased since 2018 with an average of 15 ADUs per year over the last six years. The Belmont Sites Inventory conservatively assumes an average of 13 ADUs per year at the moderate-income level, or 90 total moderate-income units (between 2024-2031).

TABLE 6-4: SIX-YEAR ACCESSORY DWELLING UNIT (ADU) PRODUCTION

Year	2018	2019	2020	2021	2022	2023	6-Year Total
ADUs Permitted	9	12	11	12	27	21	92

Source: City of Belmont, 2024.

RHNA CREDITS SUMMARY

A summary of the pipeline developments and projected ADU development which can serve as “alternative means” or credits toward the City of Belmont’s RHNA requirements are included in Table 6-5. Together these credits total 1,113 units (more than 50% of the required RHNA). The following Section 6.3, Sites Inventory Methodology, describes the land availability to accommodate the remaining RHNA.

TABLE 6-5: RHNA CREDITS

Address	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Total Units
Pipeline Units	131	175	21	487	814
Pending Units	63	13	11	122	209
Projected ADUs (2024-2031)	0	0	90	0	90
TOTAL	194	188	122	609	1,113

Source: City of Belmont, 2024.

6.3 SITE INVENTORY METHODOLOGY

The City has identified adequate sites to accommodate the remaining RHNA and an ample buffer for all income categories after credits are applied. City staff inventoried vacant and underutilized parcels in Belmont to determine what land is available for development at various density levels. Types of suitable sites include the following.

- Vacant, residentially zoned sites.
- Vacant, non-residentially zoned sites that allow residential development.
- Underutilized residentially zoned sites capable of being developed at a higher density or with greater intensity (Note: “underutilized” refers to land-improvement ratios which evaluates the amount of available land in comparison to the development intensity of the existing improvements constructed on-site).
- Underutilized sites zoned for residential use.
- Underutilized sites zoned for mixed-use use that allow residential development.
- Residentially zoned sites that are capable of being developed at a higher density (non-vacant sites, including underutilized sites).
- Sites owned or leased by the City.
- Non-residentially zoned sites that can be redeveloped for residential use (via program actions).

RECENT DEVELOPMENT TRENDS

After many years of limited development activity in the city, Belmont has seen a significant increase in housing projects since the 2017 adoption of a comprehensive General Plan update

6. ADEQUATE SITES

and the Belmont Village Specific Plan (BVSP) for the area near the Caltrain station. As a result of these planning efforts and revised development standards, the City currently has 11 multi-family residential projects comprising 998 units that have either been entitled (pipeline projects) or are submitted entitlement applications (pending projects). These projects include a mix of unit types, tenures, and targeted incomes, including four 100% affordable rental projects, market rate rental multi-family apartments, and for-sale townhomes. The characteristics of these pipeline and pending projects serve as the basis for the analysis of feasibility and capacity for Belmont's housing inventory sites. Table 6-6 provides an analysis of site characteristics for these projects.

PRIOR USES/BUILDING CHARACTERISTICS

The pipeline and pending projects, as shown in Table 6-6, are located on non-vacant properties containing older, low-density, commercial and industrial development. The majority of the sites were non-vacant and had a variety of commercial and light industrial uses such as auto service, low-rise office buildings, light manufacturing, stand-alone retail buildings, and a former ice rink. All of the proposed developments are on sites where the buildings were over 40 years old. In addition, except for the City-owned Fire Station property, the uses existing on-site were fully operational at the time development proposals were submitted to the City, demonstrating that even properties with active commercial or industrial uses can be converted to residential.

IMPROVEMENT TO LAND RATIO

As shown in Table 6-6, the Improvement to Land Ratio (ILR), a measure of the development intensity of the property, is 0.55 and below for all of the sites, with the average value of 0.2. This indicates that the properties were underutilized, many with large amounts of surface parking, and therefore prime for redevelopment.

SITE CONSOLIDATIONS

As seen in Table 6-6, eight of the 11 pipeline projects are located on consolidated sites, comprised of up to nine different parcels. Of the three remaining sites that did not include lot consolidations, two are small site developments located on parcels of under ½-acre and the remaining site is the redevelopment of a retail strip center with active retail uses.

Many of the consolidated properties had previously been under multiple ownerships prior to being assembled for development.

Below are examples of pipeline and pending projects in the RHNA-6 planning period and two examples of successful lot consolidations that were completed during the RHNA-5 planning period with varying densities and affordability levels. These examples demonstrate that the lot consolidation opportunities identified in the RHNA-6 Sites Inventory are achievable.

TABLE 6-6: PIPELINE AND PENDING MULTI-FAMILY PROJECTS SITE CHARACTERISTICS

Address	Project Characteristics				Predevelopment Site Properties			
	Total Units	Size (Acres)	Density (Units/Acre)	Status	Consolidated Site?	Prior Uses	Building Age	ILR
Pipeline Projects								
Firehouse Square 1 (100% Affordable Rental)	66	0.72	91	Completed 2023	Yes (3 Parcels)	Firehouse & vacant lot	1936	0.171
Firehouse Square 2 (For-Sale Townhomes)	15	0.52	29	Completed 2024	Yes (3 Parcels)	Firehouse & vacant lot	1936	0.053
815 Old County Road (Market Rate Rental)	177	1.74	102	Completed 2024	Yes (2 Parcels)	Ice Rink	c. 1960	0.289
1325 Old County Road (Market Rate Mixed-Use Rental)	250	2.08	120	Completed 2024	Yes (5 Parcels)	Commercial and industrial concrete tilt-up buildings	c. 1937	0.349
803 Belmont Avenue (100% Affordable Rental)	125	1.46	86	Construction	Yes (2 Parcels)	Motel & vacant lot	1953	0.067
608 Harbor Blvd. (Market Rate Rental)	103	0.71	145	Approved	Yes (4 Parcels)	Gas station, car wash, & former railroad track	1970-1982	0.019
Hill St. at El Camino Real (100% Affordable Rental)	37	0.32	116	Approved	Yes (4 Parcels)	Auto repair shop & three retail stores	c. 1960	0.55
800 Laurel Avenue (For-Sale Townhomes)	16	1.79	9	Approved	Yes (9 Parcels)	SFD & vacant land	1938	0.019
PIPELINE MULTI-FAMILY SUBTOTAL	789							
Pending Projects								
580 Masonic Way (Market Rate Rental)	139	1.24	112	Applied	No	Retail strip mall	1956	0.323
1477 El Camino Real (Market Rate Mixed-Use Rental)	5	0.15	33	Applied	No	Vacant land	n/a	0
678 Ralston Ave (100% Affordable Rental)	65	0.36	181	Applied	No	Dry cleaners	1961	0.233
PENDING MULTI-FAMILY SUBTOTAL	209							
TOTAL	998							

Source: City of Belmont, 2024.

RHINA CYCLE 6 PIPELINE AND PENDING PROJECTS WITH SITE CONSOLIDATIONS:

- **803 Belmont Avenue:** Two parcels including a motel and a small vacant lot, each under separate ownership. The combined 1.46-acre site is approved for 124 low-income units and one market-rate unit and started construction in May 2024.
- **815 Old County Road:** Two non-vacant parcels under the same owner previously used as an ice rink. The combined 1.74-acre site developed with 27 low-income units and 150 market-rate units and was completed in 2024.

6. ADEQUATE SITES

- **608 Harbor Blvd.:** Four non-vacant parcels with three separate owners currently used as a gas station, former railroad track remnant, and self-service car wash. The combined 0.71-acre site is approved for 16 low-income units and 87 market-rate units.
- **Hill Street at El Camino Real:** Four non-vacant parcels previously used as an auto repair shop and three retail stores. The City purchased the sites from two owners and consolidated them for affordable housing development. The combined 0.32-acre site is approved for 36 low-income units and one market-rate unit.
- **800 Laurel Avenue:** Nine parcels currently consisting of a single-family home and vacant land under a singular owner. The combined 1.79-acre site is approved for 16 market-rate units.
- **Firehouse Square 1 and 2:** Three parcels consisting of a former City-owned firehouse and privately owned vacant lot. The combined 1.25-acre site developed with 65 very low-income units completed in 2023 and 16 market-rate townhome units which were completed in 2024.
- **1325 Old County Road:** Five small non-vacant parcels (including two parcels that needed to be annexed into the City of Belmont to accommodate the project), with five owners, which previously contained a mix of commercial and light industrial buildings, which were predominantly one and two-story tilt-up concrete construction. The combined 2.1-acre site developed into 250 rental housing units, including 37 lower-income affordable units and was completed in 2024.

RHNA CYCLE 5 PROJECTS WITH SITE CONSOLIDATIONS:

- **400 El Camino Real:** Two non-vacant parcels containing a convenience market, a two-story office building, and parking. The combined 1.83-acre site developed into 73 units and approximately 5,000 square feet of commercial space (developer made inclusionary housing in-lieu contribution) and was completed in 2019.
- **576-600 El Camino Real:** Four non-vacant parcels containing a three-unit retail plaza and home goods boutique under a single ownership. The combined 0.91-acre site developed with 32 market-rate units (developer made inclusionary housing in-lieu contribution) and was completed in 2017.

DENSITY

The Belmont Village Specific Plan (BVSP) zone does not include any maximum residential density metric, which has resulted in densities of more than 100 units per acre regularly being attained for multi-family residential projects. The City of Belmont currently has six multi-family residential projects either under construction or in development review that exceed 100 units per acre, as reflected in Table 6-6. In January 2024, the City implemented Housing Element Program H4.1, Update Zoning Code to Increase Floor Area Ratios and Density, to eliminate the maximum residential density metric and increase the allowable Floor Area Ratio (FAR) for all properties in the Corridor Mixed Use (CMU) district to continue to encourage densities greater than 100 dwelling units per acre.

SMALL SITE DEVELOPMENT

Another notable development trend in Belmont is the development of small sites that are less than a ½-acre in size. The City currently has three projects in the pipeline on sites that are between 0.15 to 0.36 acres (as shown in Table 6-6). It is also important to note that of these projects, two are 100% affordable projects which indicates that it is feasible to build affordable housing on small sites.

SITE INVENTORY APPROACH

Staff conducted a site-by-site review of potential development sites citywide. As demonstrated below, staff currently believe that the RHNA, plus a reasonable buffer, can be accommodated on parcels identified in the Sites Inventory using current land use and zoning regulations. Each site, or potential aggregation of sites, was analyzed to discern the likelihood and feasibility of development during the period of 2023-2031. Based on the recent development trends in Belmont, as evidenced by the characteristics of the pipeline and pending projects, factors such as underperforming or vacant uses, owner or developer interest, age of current improvements, Improvement to Land Ratio (ILR), and potential site constraints were reviewed. Given these considerations, the City identified sites that are likely to develop/redevelop within the planning period.

As seen in Table 6-11 at the end of this chapter, the adequate sites analysis demonstrates that there is enough land to meet the City's RHNA. The City's Sites Inventory for future housing includes property zoned for mixed use (including high density residential) that is currently vacant, as well as land that is underutilized. The majority of the properties in the Sites Inventory are non-vacant lands that are underutilized given that the City is primarily built out and has limited vacant land. However, as demonstrated by the pipeline and pending projects, the City is experiencing a high volume of residential projects on underutilized non-vacant sites and expects this trend to continue.

REALISTIC CAPACITY

When establishing realistic unit capacity calculations, the jurisdiction must consider current development trends of existing or approved residential developments at a similar affordability level in that jurisdiction, as well as the cumulative impact of standards such as height, open space, parking, and floor area ratios (FARs). The capacity methodology must be adjusted to account for any limitation because of availability and accessibility of sufficient water, sewer, and dry utilities. For non-residential zoned sites (i.e., mixed-use areas or commercial sites that allow residential development), the capacity methodology must account for the likelihood of residential development on these sites. For a detailed discussion of non-residential development, please see *Chapter 4, Constraints*, Section 4.2 Governmental Regulations and Constraints, Multi-Family Housing subheading.

Belmont currently has 1,023 housing units as pipeline or pending projects (either constructed since 2023, currently under construction, approved with entitlements, or in development

6. ADEQUATE SITES

review). These units represent more than 50% of the total RHNA allocation for the next planning period.

The City does not have a maximum density in the zoning districts where the housing opportunity sites are located. Therefore, the City cannot assume housing opportunity sites will develop based on that maximum (such as 75% or 80% of the maximum density in that district.) Instead, the City is basing its assumption on past projects. The City has conducted a thorough analysis of pipeline and pending developments and has determined that sites over ½-acre (when consolidated) are developing, on average, at the equivalent of 98 dwelling units per acre as shown in Table 6-7 below.

TABLE 6-7: PIPELINE AND PENDING PROJECT DENSITIES ON CONSOLIDATED SITES OVER ½-ACRE

Address	Parcel Size (Acres)	Total Units	Density (Units/Acre)	Zoning	Density Bonus
803 Belmont Avenue (100% Affordable)	1.46	125	86	CMU	Yes – number of units and height
815 Old County Road	1.74	177	102	VCS	Yes – FAR, height and bulk
580 Masonic Way	1.24	139	112	VCS	Yes – to be determined
1325 Old County Road	2.08	250	120	VCMU	No – applicant did not request
608 Harbor Blvd.	0.71	103	145	HIA	Yes – for building code (reach code) requirements
Firehouse Square 1 1300 El Camino Real (100% Affordable)	0.72	66	91	VC	Yes – parking
Firehouse Square 2	0.52	15	29	VC	No
Average Units Per Acre			98		

Source: City of Belmont, 2024.

To be conservative, the City has assumed a density of 75 dwelling units per acre for the identified housing opportunity sites over ½-acre in the Sites Inventory. The only exception to this is 832 Belmont Avenue (0.73 acres after consolidation) which has an assumed density of 35 dwelling units per acre. This site is located on a steep hillside which limits development capacity. As a result, the density assigned was based on preliminary development proposal previously considered for the site.

The City has three projects currently in the pipeline on sites that are less than a ½-acre and they have widely varying densities ranging from 33 to 181 units per acre as shown in Table 6-8. Despite there not being a large sample size, it does demonstrate interest and feasibility of developing these smaller sites independent of lot consolidations. In particular, 678 Ralston is proposed by an experienced affordable housing developer that has been successful at getting tax credits and completing projects. They have indicated interest in developing another property under ½ acre in the City as well. Based on this information, the City is confident that projects with affordable units are feasible on sites less than ½ acre. To be conservative, the City is assuming a density of 30 dwelling units per acre for the sites less than a ½-acre in the Housing Sites Inventory.

TABLE 6-8: PIPELINE AND PENDING PROJECT DENSITIES ON SITES UNDER ½-ACRE

Address	Parcel Size (Acres)	Total Units	Density (Units/Acre)	Zoning	Density Bonus
Hill Street at El Camino Real (100% Affordable)	0.32	37	116	VC	Yes – FAR, height, bulk, setback
1477 El Camino Real	0.15	5	33	CMU	No
678 Ralston Ave (100% Affordable)	0.36	64	181	VCMU	Yes – to be determined, expected to include FAR and height
Average Units Per Acre			110		

Source: City of Belmont, 2024.

Housing Element Program H4.1 directs the City to modify the Corridor Mixed Use (CMU) and Village Station Core (VSC) zoning districts to eliminate the maximum residential density and increase the allowable FAR, so that these zoning districts align with development capacity in the more intensive BVSP districts. These Zoning Ordinance amendments were completed in January 2024.

While these Zoning Ordinance amendments were not required for Belmont to meet the RHNA allocation, they eliminate a potential constraint to housing development and ensure that the Sites Inventory projections are both realistic and achievable. The zoning amendments also ensure that multi-family housing projects achieving higher densities can provide lower-income housing units.

With the Zoning Ordinance amendments completed in January 2024, all of the sites in the Housing Sites Inventory are located in zoning districts that allow unlimited density. As a result, the Floor Area Ratio (FAR) is an important measure of the capacity of the sites in the Inventory. All of the sites in the Housing Sites Inventory have an allowed FAR of 2.0. The Metropolitan Transportation Commission (MTC) has issued guidance for its Transit-Oriented Communities Policy that provides equivalencies for cities that do not use maximum density to determine the intensity of development. These equivalencies are “default” standards based on sample projects. MTC guidance equates 1.5 to 1.99 FAR as 75 dwelling units per acre. Between 2.0 and 2.99 FAR is equivalent to 100 dwelling units per acre. Therefore, it is reasonable to conclude that Belmont’s FAR of 2.0 will be sufficient to reach the 75 unit per acre density assumed in the Sites Inventory based on MTC’s analysis of sample projects in the Bay Area.

Specific to Belmont, the City requires an inclusionary housing requirement on all projects of 25 units or greater. The developer is required to construct those units; there is not an option to pay an in-lieu fee. Once a developer complies with the City’s inclusionary housing requirements, they are automatically eligible to apply the State Density Bonus law. Since the City uses FAR as the primary measure of development intensity, the FAR limit is automatically increased for Density Bonus projects. No discretionary action is required for this bonus. State Density Bonus law is applied to the FAR limit as described below.

6. ADEQUATE SITES

Ownership housing projects in Belmont:

- Requirement of 15% moderate income units.
- Under State law, 15% moderate income units entitles the applicant to a 10% bonus.
- $2.0 \text{ FAR} \times 10\% \text{ bonus} = 0.2 \text{ bonus}$.
- $2.0 \text{ FAR} + 0.2 \text{ bonus} = 2.2 \text{ effective FAR}$.

Rental housing projects in Belmont:

- Requirement of 15% low-income units.
- Under State law, 15% low-income units entitles the applicant to a 27.5% bonus.
- $2.0 \text{ FAR} \times 27.5\% \text{ bonus} = 0.55 \text{ bonus}$.
- $2.0 \text{ FAR} + 0.55 \text{ bonus} = 2.55 \text{ effective FAR}$.

While the City's Zoning Ordinance includes a base FAR of 2.0, the effective FAR for housing projects of 25 units or greater is actually 2.2 for ownership projects and 2.55 for rental projects. As shown in Table 6-9 below, the City has a proven track record of approving projects over 75 units per acre in this FAR range, which demonstrates that FAR is not a constraint on development at the density assumed for Housing Inventory sites.

The sites in the Housing Inventory have Zoning Ordinance height limits of 45 to 50 feet. The development standards allow encroachments into the height limit for non-habitable spaces such as equipment and stairs. Similar to the FAR analysis above, the height of housing projects can be increased through State Density Bonus law; however, this is not always required to reach densities above 75 units per acre. As shown in Table 6-9, the height of recent pipeline and pending projects has ranged from 53-65 feet and four to six stories. The projects at 803 Belmont and 815 Old County Road utilized Density Bonus to achieve the height. 1325 Old County Road complies with the height limit of the zoning district. Firehouse Square 1 was a partnership with a non-profit developer on City-owned land which utilized Density Bonus and Community Benefits to achieve development standards that met the goals of the project. This project history demonstrates that height is not a constraint on development at the assumed density of 75 units per acre for Housing Inventory sites.

TABLE 6-9: FLOOR AREA RATIO (FAR) AND HEIGHT FOR PIPELINE AND PENDING PROJECTS

Project Address	Density (Units/Acre)	FAR	Height/Number of Stories	Number of Lower-Income Units	Total Number of Units
803 Belmont	86	1.92	65'/6	124	125
815 Old County Road	102	2.03	60'/5	27	177
1325 Old County Road	120	2.46	53'/4	35	250
Firehouse Square I	91	2.37	64'/4	65	66

Source: City of Belmont, 2024.

The City of Belmont also has a Community Benefits program that allows applicants to apply for relaxed development standards in exchange for benefits for the larger community. This tool has been used to further facilitate affordable housing projects in the city. It is not analyzed in depth

here because it is a discretionary process and an additional tool separate from the City's zoning and State Density Bonus. It is an additional way the City can support affordable housing projects but it is not necessary to meet the City's RHNA.

For all opportunity sites, the distribution of units by income category was determined using the common methodology of matching the RHNA affordability distribution of 27% Very Low-Income, 16% Low-Income, 16% Moderate-Income, and 41% Above Moderate-Income. The distribution was also applied to the sites under ½-acre in size as the city's development history demonstrates that affordable housing is feasible on smaller sites. Only four properties in the Sites Inventory are under ½-acre. Three of those sites are a similar size to 678 Ralston, where an affordable housing project is proposed, and the fourth site is owned by the City. Based on these specific characteristics, the City concludes that affordable housing is feasible on those four sites.

RESIDENTIAL DEVELOPMENT IN MIXED USE ZONING DISTRICTS

Multi-family residential housing developments are the foundation of the vision for the Belmont Village districts and CMU district along El Camino Real. All of the Housing Inventory Sites are located in these zoning districts. The City has a strong record of completed and approved multi-family developments in mixed-use zoning districts. In the Belmont Village and CMU districts, retail and restaurant uses are allowed but are expected to be located on the ground floor of multi-story buildings and are therefore not an impediment to housing production. Office uses are allowed in these districts but it is unlikely that major office uses would locate in the mixed-use districts because there are other locations in the City that are better suited for major office development.

Since 2017, there have been no proposals for office development in these areas, even before the slowdown in office demand resulting from the COVID-19 pandemic. Smaller, locally serving office may develop over time but the City has not received any proposals for those types of uses since 2017. Therefore, the City does not anticipate receiving applications for 100% commercial projects in the mixed-use zones. Program H4.7 commits the City to monitor commercial development in mixed-use zones and make necessary changes if trends change during the planning period. For a detailed discussion, please see *Chapter 4, Constraints*, under Section 4.2, Governmental Regulations and Constraints, Multi-Family Housing subheading.

SITES USED IN PREVIOUS PLANNING PERIODS HOUSING ELEMENTS

As shown in Appendix B, the Sites Inventory includes a number of sites that were included in the sites inventory of Housing Elements from prior periods. However, these sites have been subsequently rezoned to allow for higher residential development capacity as part of the 2017 General Plan Update and adoption of the Belmont Village Specific Plan. This rezoning was not required for any of the sites to accommodate the RHNA capacity assigned to them in the 2015-2023 Housing Element. As a result, per HCD guidance, these sites can be considered as new sites for the purpose of the housing element inventory. The sole exception was the 580 Masonic

site which was zoned as commercial and had to be rezoned to allow for residential uses. That site is currently a pending project and is described earlier in this chapter.

AFFORDABILITY MIX

For all opportunity sites, the distribution of units by income category was determined using the common methodology of matching the RHNA affordability distribution of 27% Very Low-Income, 16% Low-Income, 16% Moderate-Income, and 41% Above Moderate-Income. The distribution was also applied to the sites under ½-acre in size as the city's development history demonstrates that affordable housing is feasible on smaller sites. Only four properties in the Sites Inventory are under ½-acre. Three of those sites are a similar size to 678 Ralston, where a 100% affordable housing project is proposed, and the fourth site is owned by the City. Based on these specific characteristics, the City concludes that affordable housing is feasible on those four sites. The City anticipates that when developed, the projects will either be 100% affordable or will comply with the City's Inclusionary Housing policy.

SITE CONSOLIDATIONS

The Housing Sites Inventory includes 30 sites that are less than a ½-acre in size. Of these sites, 26 have the potential to be consolidated into a larger, more usable development site with adjacent parcels. Consolidation is most likely to occur if the parcels are under the same ownership. In addition, it is easier to consolidate parcels if there are a limited number of owners to negotiate with and a small number of overall parcels involved. With these considerations in place, the Housing Sites inventory consolidated development sites have no more than two owners and three parcels (with the exception of Sites B and R which each have a single owner and five parcels). Three City-owned vacant parcels are also part of the small sites included on the Inventory.

As described earlier in this chapter in the Recent Development Trends analysis, the City of Belmont has a strong track record of small lot consolidation to create larger development parcels. To further encourage future lot consolidation, a new program providing incentives for lot consolidation is included in the Housing Element (see Program H4.3, Lot Consolidation Fee Waivers).

The proposed lot consolidation opportunity sites in the Housing Sites Inventory, each of which is detailed in Section 6.4, have varying sizes and existing conditions and have been evaluated to meet enough criteria needed to reasonably expect development potential during the planning period.

NON-VACANT SITES

California State law requires that for non-vacant sites, the City must demonstrate the potential and likelihood of additional development within the planning period, based on the extent to which existing uses may constitute an impediment to additional residential development, past experience with converting existing uses to higher-density residential development, current

market demand for the existing use, any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites. Furthermore, if non-vacant sites accommodate 50% or more of the lower-income RHNA, the City must demonstrate that the existing use is not an impediment to additional development and will likely discontinue in the planning period, including adopted findings based on substantial evidence.

New multi-family development within Belmont will be predominantly located within Downtown transit corridors, where there are very few sites that can be considered vacant. Given the lack of vacant land, the City has developed a substantial track record of non-vacant sites redeveloping from non-housing to housing uses, including sites with active commercial uses. As described under the Recent Development Trend subsection of this chapter and shown in Table 6-6, 993 out of 1,023 total pipeline units are being developed on non-vacant sites. Of these units, 381 units are affordable, either because of inclusionary obligations or because they are 100% affordable projects.

AVAILABLE INFRASTRUCTURE AND UTILITIES

It is anticipated that the city has adequate capacity to meet demand and adequate capacity to expand to meet projected development as part of the Housing Element. Current facilities and/or infrastructure are reported to be in good operating condition. Larger housing development projects may require the installation of utility infrastructure to accommodate individual project impacts, including water main lines, upsized sewer lines, and/or additional lateral connections within the city. Infrastructure installations necessary to serve future development would generally be installed within the already disturbed rights-of-way of existing roads or within the disturbance footprints of development projects. Implementation of proposed capital improvement projects for the Silicon Valley Clean Water treatment plant would ensure adequate capacity to serve projected demand. A more in-depth discussion of infrastructure and utility availability is included in *Chapter 4, Constraints*.

A copy of the updated Housing Element and growth projections is provided to utility providers to ensure long term service planning and capital improvements will provide sufficient capacity to accommodate the City's regional housing need for the planning period.

ENVIRONMENTAL SITE CONSTRAINTS

One of the most prominent site characteristics in Belmont that can impede housing development is the presence of steep slopes and unstable terrain, which result from the city's proximity to the San Andreas fault. These steep hillside areas would not be appropriate for medium or high-density residential; therefore, the Sites Inventory focuses on areas away from the hillsides and near major transit corridors.

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Two City-owned properties in the Sites Inventory, Firehouse Square 1 and Hill Street at El Camino Real, contain(ed) underground storage tanks (USTs) subject to environmental remediation and removal. The UST at Firehouse Square 1 was removed and the site has been fully remediated, and construction of 66 affordable housing units is complete.

At Hill Street at El Camino, the City has approved contributing the land at no cost to the affordable housing developer (valued at \$4M) and is contributing an additional loan of up to \$1M, and in return is requiring 37 lower-income housing units. This project has applied for TCAC funding and is expected to be built during this planning period. The UST located on this site will be removed in concert with the initial site grading and has been included in the project development budget. Exposure to soil vapor will be controlled and follow-up testing will be completed in accordance with the direction and oversight of the San Mateo County Environmental Health Department (SMCEHD). Prior to beginning construction, the City of Belmont Community Development Department must receive assurance from SMCEHD that the site has been fully remediated and is safe for housing.

The City has prepared an Environmental Impact Report (EIR), pursuant to the California Environmental Quality Act (CEQA) Guidelines, which comprehensively analyzed the environmental impacts of housing development identified in the Housing Element. The EIR identified significant unavoidable impacts related to construction related noise and identifies the following mitigation measures to ensure safe housing development.

- **Air Quality Measures During Construction** – All development facilitated by the project shall be required to reduce construction emissions of reactive organic gases, nitrogen oxides, and particulate matter (PM₁₀ and PM_{2.5}) by implementing the Bay Area Air Quality Management District's (BAAQMD's) Basic Construction Mitigation Measures or equivalent, expanded, or modified measures based on project and site-specific conditions.
- **Air Quality Building Design Measures** – Prior to issuance of building permits for residential developments within 1,000 feet of State Route 82 (i.e., El Camino Real), a roadway health risk assessment (HRA) shall be prepared by a qualified air quality analyst. The roadway HRAs shall demonstrate that roadway impacts are below the BAAQMD's single-source risk and hazard thresholds. If risks and hazards exceed the applicable BAAQMD thresholds, then feasible project design features such as high-efficiency filtration shall be incorporated into the project.
- **Noise During Construction** – For projects involving pile drivers, vibratory rollers, or similar high-vibration equipment, the applicant shall prepare a Vibration Control Plan prior to the commencement of construction activities. The Vibration Control Plan shall be prepared by a licensed structural engineer and shall include methods to minimize vibration.

6.4 SITES INVENTORY

Figure 6-1 shows all adequate housing opportunity sites within the city of Belmont and Table 6-10 summarizes these sites according to how the City will utilize them to meet its RHNA. Based on pipeline and pending projects, projected ADU production, and the realistic capacity of the adequate sites inventory identified here within, the City has capacity to develop 2,289 new housing units, including a “buffer” to comply with the “No Net Loss” provisions (see Table 6-10 for the Sites Summary). This projection of sites inventory units does not require any land use or zoning changes but does assume that projects will continue to utilize State Density Bonus provisions to achieve full development potential (as described in the Realistic Capacity section above).

Per HCD guidance, the City’s Sites Inventory is described herein on a site-by-site basis and organized according to vacant and non-vacant land resources. It should be noted that a majority of the City’s adequate sites are non-vacant land resources as identified within this subsection.

As discussed in *Chapter 3, Affirmatively Furthering Fair Housing Summary*, the City of Belmont is a high-resource community that does not include any moderate or low resources areas. The highest opportunity areas are west of El Camino/Old County Road, while the remainder of Belmont are in high opportunity areas. All sites, including those suitable for affordable to lower-income households, are located in the high or highest opportunity areas. Although Belmont does not have a pattern of segregation within the city, from a broader regional perspective, providing increased lower-income housing opportunities in a high resource community such as Belmont will help overcome countywide and regional patterns of segregation, disparate impacts for impacted racial and ethnic groups, and foster more inclusive communities free from barriers that restrict access to opportunity.

Figure 6-1: Sites Inventory Map

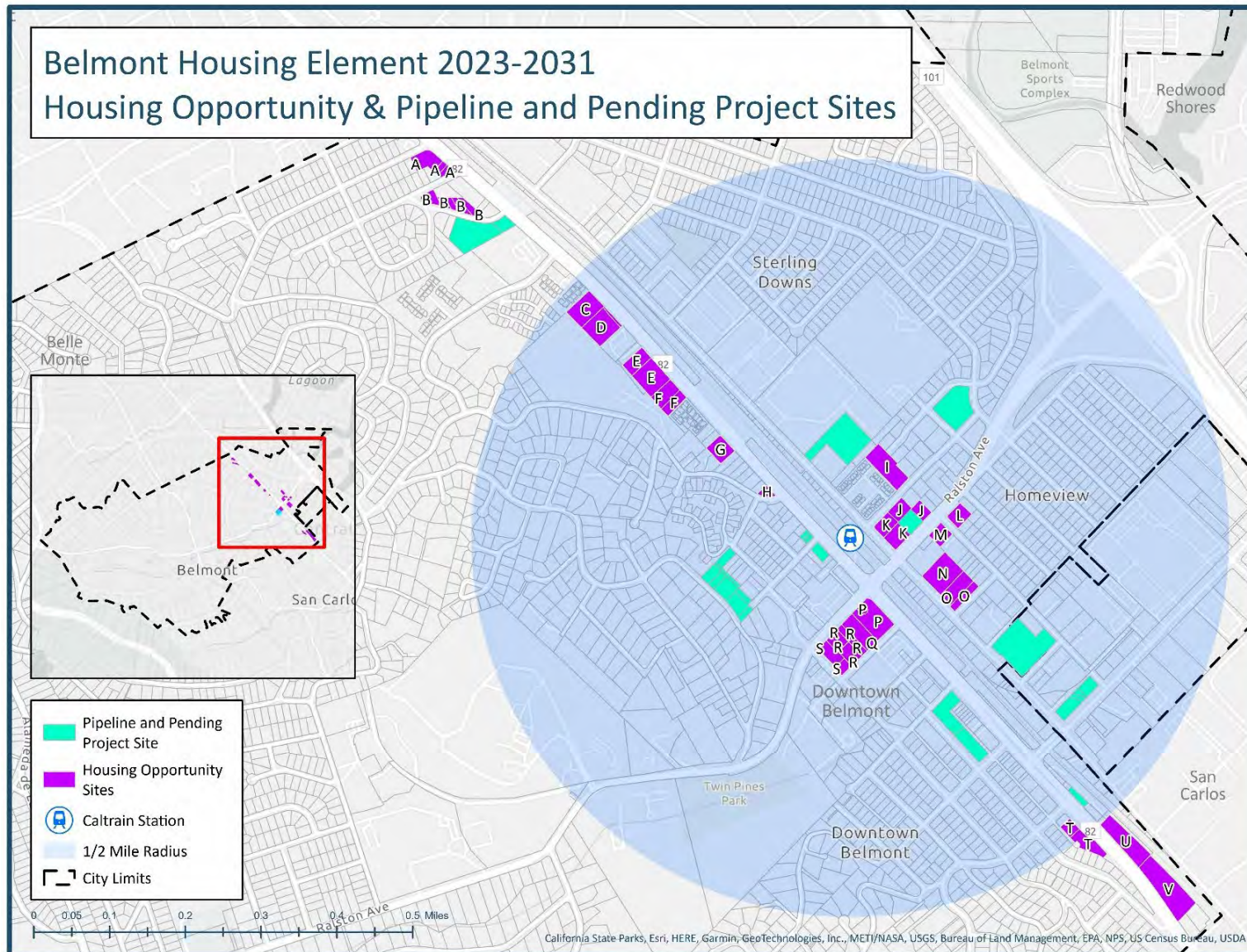


TABLE 6-10: SITE INVENTORY SUMMARY

Site ID	Site Address	APN	General Plan/Zoning	Acres	Assumed Density (Acres)	Existing Use	VLI	LI	MOD	AM	Total
A	210-230-240 El Camino Real	044-152-100 044-152-110 044-152-120	CMU	0.69	75	Commercial	14	8	8	22	52
B	832 Belmont Ave, Anita Ave	044-173-010 044-173-120 044-173-190 044-173-210 044-173-220	CMU	0.73	35	Vacant	7	4	4	10	25
C	510 El Camino Real	044-201-180	CMU	0.81	75	Commercial Restaurant	16	10	10	25	61
D	516 El Camino Real	044-201-040	CMU	0.85	75	Commercial Store	17	10	10	26	63
E	530 El Camino Real	044-201-080 044-201-070	CMU	1.28	75	Commercial Store and Parking	26	15	15	40	96
F	500-564 El Camino Real	044-201-280 044-201-270	CMU	0.76	75	Commercial Hotel and Auto Repair	16	9	9	23	57
G	690 El Camino Real	044-222-210	CMU	0.44	30	Commercial	4	2	2	5	13
H	780 El Camino Real	044-222-180	CMU	0.12	30	Vacant	1	0	0	2	3
I	640 Masonic Way	040-312-180	VCS	0.97	75	Public Facilities – Post Office	20	11	12	30	73
J	Masonic Way 600 Ralston Avenue	040-313-310 040-313-270	VCS VCMU	0.58	75	Parking and Commercial Restaurant	12	7	7	17	43
K	698 Ralston Avenue 951 Old County Road	040-313-140 040-313-430	VCMU	0.73	75	Commercial Restaurant and Retail	15	9	9	22	55
L	575 Ralston Avenue	040-334-300	VCMU	0.36	30	Commercial Restaurant	3	2	2	4	11
M	601 Ralston Avenue	040-332-220	VCMU	0.35	30	Commercial Retail	3	1	2	4	10
N	1075 Old County Rd	040-332-270	VCMU	0.96	75	Commercial Offices	20	11	11	30	72
O	1141-1161 Old County Rd	040-332-110 040-332-260	VCMU	0.82	75	Industrial Offices and Shops	16	10	9	26	61
P	1000 El Camino Real Ralston Avenue at El Camino, Emmett's Plaza	045-182-250 045-182-260	VC	1.01	75	Commercial Retail and Restaurants, Plaza	21	12	12	31	76
Q	883 Ralston Avenue	045-182-270	VC	0.61	75	Commercial Restaurants and Offices	13	7	7	19	46

6. ADEQUATE SITES

Site ID	Site Address	APN	General Plan/Zoning	Acres	Assumed Density (Acres)	Existing Use	VLI	LI	MOD	AM	Total
R	915 Ralston Avenue	045-182-040									
	925 Ralston Avenue	045-182-030									
	940 Emmett Street	045-182-200	VC	0.89	75	Commercial Retail, Offices, Restaurants and Services Parking	18	10	11	28	67
	940 Emmett Street	045-182-210									
	945 Ralston Avenue	045-182-020									
S	1085 Sixth Avenue	045-182-220	VC	0.53	75	City parking lot and Commercial	11	6	6	17	40
	995 Ralston Avenue	045-182-010									
T	1520 El Camino Real	045-253-300	VCMU	0.66	75	Commercial Retail and Services	14	8	8	20	50
	1538 El Camino Real	045-253-290	CMU								
U	1501 El Camino Real	045-252-080	CMU	1.02	75	Commercial Retail and Services	21	12	12	31	76
V	1601 El Camino Real	045-252-100	CMU	1.68	75	Commercial Retail, Offices, and Restaurant	34	20	20	52	126
Total Units							322	184	186	484	1,176

Source: City of Belmont, 2024.

VACANT SITES

There are two housing sites identified as vacant in the Sites Inventory. Please note several “vacant” parcels throughout the city that were identified as suitable for residential development are not included within this subsection and are instead included within the “Non-Vacant (Underutilized) Land” subsection due to their proposed consolidated development along with non-vacant parcels.

6. ADEQUATE SITES

832 BELMONT AVENUE, ANITA AVENUE (SITE B)



APN	Address	Acres	Existing Use	Improv/ Land Ratio	Total Capacity	Building Age	Building Stories
044-173-120	832 Belmont Avenue	0.149	Vacant	0	5	N/A	N/A
044-173-190	832 Belmont Avenue	0.180	Vacant	0	6	N/A	N/A
044-173-210	832 Belmont Avenue	0.094	Vacant	0	3	N/A	N/A
044-173-220	832 Belmont Avenue	0.096	Vacant	0	4	N/A	N/A
044-173-010	Anita Avenue	0.208	Vacant	0	7	N/A	N/A
TOTAL		0.73		0	26		

Site B is comprised of five vacant lots totaling 0.7 acres after consolidation and are currently zoned Corridor Mixed Use (CMU). Given the steep slope of the site, a density of 35 du/acre was used to calculate a realistic capacity of 26 units. All of the parcels are under the same ownership and the owner had previously submitted a development application considering building between 25 to 37 units on the property. Given the prior development interest and the consolidated ownership of the parcels, this site is likely to develop within the planning period.

780 EL CAMINO REAL (SITE H)



APN	Address	Acres	Existing Use	Improv/ Land Ratio	Total Capacity	Building Age	Building Stories
044-222-180	780 El Camino Real	0.12	Vacant lot	0	3	N/A	N/A
TOTAL		0.12		0	3		

This 0.12-acre housing site is currently zoned Corridor Mixed Use (CMU). A density of 30 du/acre was used to calculate a realistic capacity of 3 units. The site is a vacant City Housing Successor owned property and is located on the El Camino Real transit corridor. Habitat for Humanity has expressed interest in the past to construct 4 to 7 units on the site. This site is similar in size to the pending project at 1477 El Camino Real, a 0.15-acre site that has 5 units proposed. The City intends to issue a request for proposals, pursuant to the Surplus Property Act, to solicit a residential development proposal for this site during the planning period.

NON-VACANT (UNDERUTILIZED) SITES

New multi-family development within Belmont will be predominantly located within Downtown transit corridors, on non-vacant sites, with the exception of vacant parcels that are included as part of site consolidations. As a result, more than 50% of the Sites Inventory, 20 out of 22 sites, are on non-vacant parcels. This subsection includes an analysis of each site demonstrating that these sites have characteristics that are similar to the recent development trends for pipeline and pending housing projects and are therefore likely to develop during the next planning period.

210-230-240 EL CAMINO REAL (SITE A)



APN	Address	Acres	Existing Use	Improv/ Land Ratio	Total Capacity	Building Age	Building Stories
044-152-100	210 El Camino Real	0.50	Service Retail	0.25	37	1954	1
044-152-110	230 El Camino Real	0.09	Office and residence	0.30	7	1954	2
044-152-120	240 El Camino Real	0.10	Service Retail	0.51	8	1956	1
TOTAL		0.69		0.25-0.51	52		

This housing site is comprised of three lots totaling 0.69 acres after consolidation and is currently zoned Corridor Mixed Use (CMU). 210 and 230 El Camino Real parcels are under the same ownership. Given the age of the buildings, single-story buildings, and low ILR, the existing uses at this site are not considered an impediment to consolidation and development. There has been no development interest to date on this site. A density of 75 du/acre was used to calculate a realistic capacity of 52 units.

6. ADEQUATE SITES

510 EL CAMINO REAL (SITE C)



APN	Address	Acres	Existing Use	Improv/ Land Ratio	Total Capacity	Building Age	Building Stories
044-201-180	510 El Camino Real	0.81	Restaurant	0.17	61	1963	1
TOTAL		0.81		0.17	61		

This 0.81-acre housing site is currently zoned Corridor Mixed Use (CMU). The site is currently used as a single-story restaurant with an expansive surface parking lot. This is an underutilized site with a low ILR and the existing building is over 60 years old, therefore the existing use should not be considered an impediment to redevelopment. There has been prior development interest in this site although no planning applications were submitted. A density of 75 du/acre was used to calculate a realistic capacity of 61 units.

516 EL CAMINO REAL (SITE D)



APN	Address	Acres	Existing Use	Improv/ Land Ratio	Total Capacity	Building Age	Building Stories
044-201-040	516 El Camino Real	0.85	Large Format Retail	0.26	63	1960	1
TOTAL		0.85		0.26	63		

This 0.85-acre housing site is currently zoned Corridor Mixed Use (CMU). The site currently houses a single-story retail establishment with an expansive surface parking lot. This is an underutilized site with a low ILR and the existing building is over 60 years old, therefore the existing use should not be considered an impediment to redevelopment. There has been prior development interest in this site although no planning applications were submitted. A density of 75 du/acre was used to calculate a realistic capacity of 63 units.

6. ADEQUATE SITES

530 EL CAMINO REAL (SITE E)



APN	Address	Acres	Existing Use	Improv/ Land Ratio	Total Capacity	Building Age	Building Stories
044-201-080	530 El Camino Real	0.87	Truck rental	0.38	65	1955	2
044-201-070	530 El Camino Real	0.41	Truck rental parking lot	0	31	1956	N/A
TOTAL		1.27		0-0.38	96		

Site E includes two lots totaling 1.27 acres after consolidation and is currently zoned Corridor Mixed Use (CMU). Both parcels are under the same ownership and are being used as a truck rental facility. This is an underutilized site with a low ILR and the existing building is over 65 years old, therefore the existing use should not be considered an impediment to redevelopment. There has been prior development interest in this site although no planning applications were submitted. A density of 75 du/acre was used to calculate a realistic capacity of 96 units. This site is similar in size and age to the 1.26-acre pipeline project located at 580 Masonic Way, which would replace a strip plaza built in 1956 with 139 units.

500-564 EL CAMINO REAL (SITE F)



APN	Address	Acres	Existing Use	Improv/ Land Ratio	Total Capacity	Building Age	Building Stories
044-222-210	500 El Camino Real	0.45	Motel	0.28	34	1953	2
044-201-270	564 El Camino Real	0.31	Auto repair and service retail	0.41	23	1959	1
TOTAL		0.76		0.28-0.41	57		

This housing site includes two lots totaling 0.76 acres after consolidation and is currently zoned Corridor Mixed Use (CMU). The existing uses include a motel and a commercial building. Both parcels are under the same ownership. There has been no development interest to date on this site. Given the age of the buildings (over 65 years old), common ownership, and low ILR, the existing uses at this site are not considered an impediment to redevelopment. A density of 75 du/acre was used to calculate a realistic capacity of 57 units. This site is similar in size to the 0.71-acre pipeline project located at 608 Harbor Blvd, which consolidated 4 parcels developed with a gas station, former railroad track, and self-service car wash and proposes 103 units.

690 EL CAMINO REAL (SITE G)



APN	Address	Acres	Existing Use	Improv/ Land Ratio	Total Capacity	Building Age	Building Stories
044-222-210	690 El Camino Real	0.44	Service retail	0.45	13	1965	1
TOTAL		0.44		0.45	13		

This housing site is 0.44 acres and is currently zoned Corridor Mixed Use (CMU). The building is one-story service retail use, is close to 60 years old, and has a low ILR, therefore the existing use should not be considered an impediment to redevelopment. There has been prior development interest in this site although no planning applications were submitted. A density of 30 du/acre was used given that the site is under ½ an acre to calculate a realistic capacity of 13 units. This site is similar in building age and parcel size to the pipeline project at 678 Ralston Ave, a 0.36-acre site with a building constructed in 1961 with 65 units of affordable housing proposed.

640 MASONIC WAY (SITE I)



APN	Address	Acres	Existing Use	Improv/ Land Ratio	Total Capacity	Building Age	Building Stories
044-222-180	640 Masonic Way	0.97	USPS Post office	0.31	73	1964	1
TOTAL		0.97		0.31	73		

This 0.97-acre housing site is currently zoned Village Station Core (VSC). The site is currently in use as a Post Office but has a short-term lease and the ownership entity has reached out to the City to explore future options for redevelopment. The building is one-story, has an expansive surface parking lot, is 60 years old, and has a low IPR, therefore the existing use should not be considered an impediment to redevelopment. A density of 75 du/acre was used to calculate a realistic capacity of 73 units.

6. ADEQUATE SITES

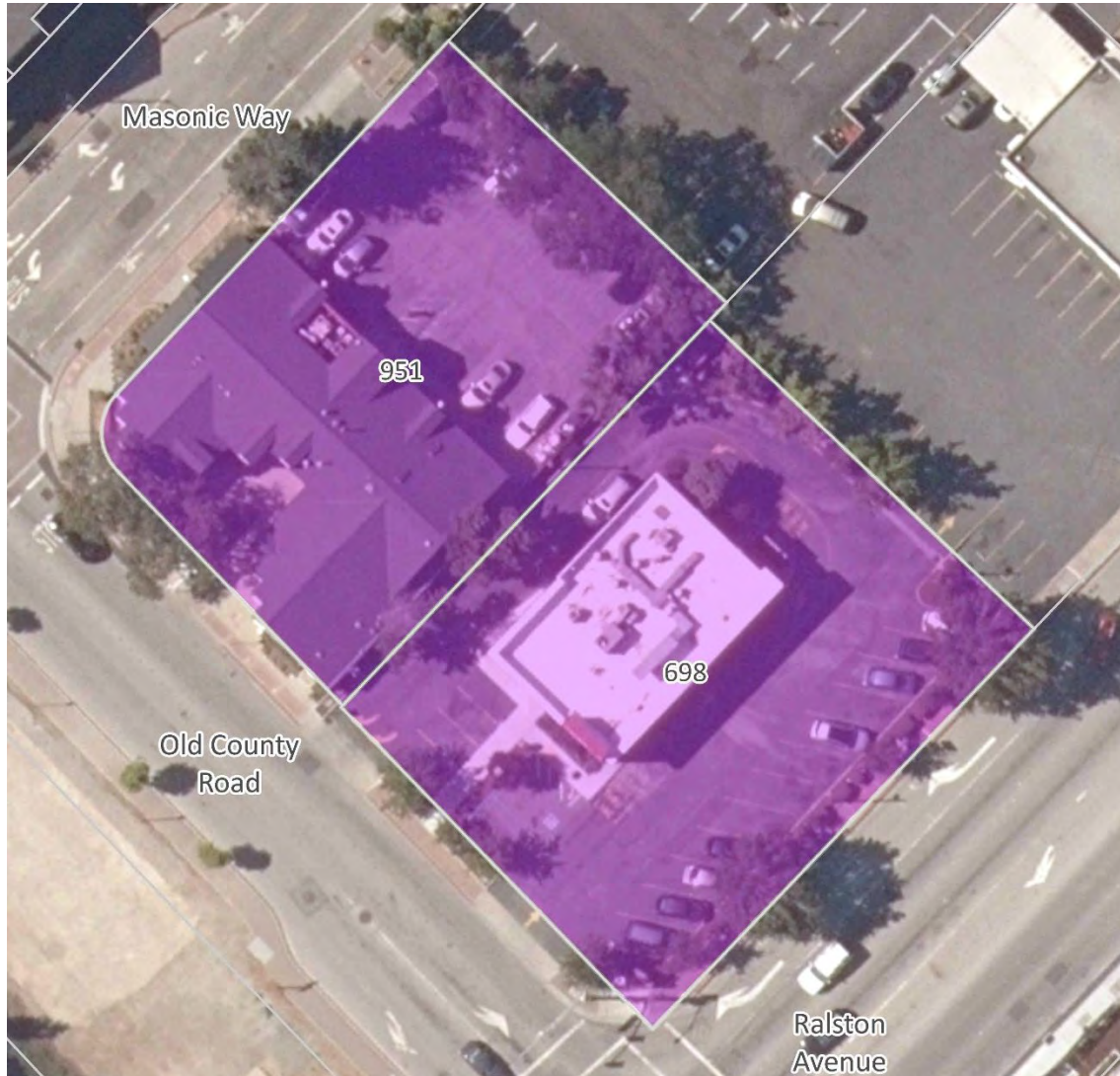
MASONIC WAY AND 600 RALSTON AVENUE (SITE J)



APN	Address	Acres	Existing Use	Improv/ Land Ratio	Total Capacity	Building Age	Building Stories
040-313-310	Masonic Way	0.33	restaurant parking lot	0	25	N/A	N/A
040-313-270	600 Ralston Avenue	0.24	restaurant	0.52	18	1988	2
TOTAL		0.57		0-0.52	43		

This housing site includes two lots totaling 0.57 acres after consolidation. Although these parcels are not immediately adjacent, the existing uses are currently connected since the parking lot is used solely by the restaurant building and both properties are under the same ownership. Masonic Way is currently zoned Village Station Core (VSC) and 600 Ralston Avenue is currently Village Core Mixed Use (VCMU). Given that both parcels are under the same ownership, are currently used in tandem, and have a low ILR, these properties will most likely be consolidated and the existing use does not present an impediment to redevelopment. There has been prior development interest in this site although no planning applications were submitted. A density of 75 du/acre was used to calculate a realistic capacity of 43 units.

698 RALSTON AVENUE AND 951 OLD COUNTY ROAD (SITE K)



APN	Address	Acres	Existing Use	Improv/ Land Ratio	Total Capacity	Building Age	Building Stories
040-313-140	698 Ralston Avenue	0.39	Fast food restaurant	0.15	30	1983	1
040-313-430	951 Old County Road	0.34	Multi-unit commercial retail/services	0.41	25	1987	1
TOTAL		0.73		0.15-0.41	55		

This housing site is comprised of two lots totaling 0.73 acres after consolidation. It is currently zoned Village Corridor Mixed Use (VCMU) and is adjacent to the Belmont Caltrain Station. These parcels are under separate ownership. Given the low ILR and single-story buildings, the existing uses at this site are not considered an impediment to redevelopment. There has been prior development interest in this site although no planning applications were submitted. A density of 75 du/acre was used to calculate a realistic capacity of 55 units.

6. ADEQUATE SITES

575 RALSTON AVENUE (SITE L)



APN	Address	Acres	Existing Use	Improv/ Land Ratio	Total Capacity	Building Age	Building Stories
040-332-220	575 Ralston Avenue	0.36	Restaurant	0.16	11	1969	1
TOTAL		0.36		0.16	11		

This housing site is currently zoned Village Core Mixed Use (VCMU). The site is currently occupied by a single-story restaurant with surface parking. Given the age of the building, low ILR, and single-story building, the existing use at this site is not considered an impediment to redevelopment. There has been prior development interest in this site although no planning applications were submitted. Since this site is less than ½ an acre, a density of 30 du/acre was used to calculate a realistic capacity of 11 units. This site is similar in parcel size to the pending project at 678 Ralston, which is 0.36 acres and proposes 65 units.

601 RALSTON AVENUE (SITE M)



APN	Address	Acres	Existing Use	Improv/ Land Ratio	Total Capacity	Building Age	Building Stories
040-334-300	601 Ralston Avenue	0.35	Retail	0.26	10	1965	1
TOTAL		0.35		0.26	10		

This housing site is 0.35 acres. It is currently zoned Village Core Mixed Use (VCMU). This is an underutilized retail property with extensive surface parking. The building is close to 60 years old, has a low ILR, and is single-story, therefore the existing use should not be considered an impediment to redevelopment. There has been no development interest to date on this site. Since this site is less than ½ an acre, a density of 30 du/acre was used to calculate a realistic capacity of 10 units. This site is similar in parcel size to the pending project at 678 Ralston, which is 0.36 acres and proposes 65 units.

1075 Old County Road (Site N)



APN	Address	Acres	Existing Use	Improv/ Land Ratio	Total Capacity	Building Age	Building Stories
040-332-270	1075 Old County Road	0.96	Class C Office building	0.54	72	1983	1
TOTAL		0.96		0.54	72		

This housing site is 0.96 acres and is currently zoned Village Corridor Mixed Use (VCMU). The Class C office building currently has vacant space for lease. The site is proximate to the Belmont Caltrain Station. Given the low ILR, single-story building, and current vacancies, the existing use at this site is not considered an impediment to redevelopment. There has been no development interest to date on this site. A density of 75 du/acre was used to calculate a realistic capacity of 72 units.

1141 OLD COUNTY ROAD AND 1161 OLD COUNTY ROAD (SITE O)



APN	Address	Acres	Existing Use	Improv/ Land Ratio	Total Capacity	Building Age	Building Stories
040-332-260	1141 Old County Road	0.54	Warehouse	0.54	40	1983	1
040-332-110	1161 Old County Road	0.28	Warehouse	0.75	21	1960	1
TOTAL		0.82		0.54-0.75	61		

Site O includes two parcels totaling 0.82 acres after consolidation and is currently zoned Village Corridor Mixed Use (VCMU). The properties are currently being used for light industrial warehouse purposes and are under separate ownership. The site is proximate to the Belmont Caltrain Station. Given the age of the buildings, low ILR, and single-story buildings, the existing uses at this site are not considered an impediment to consolidation and redevelopment. There has been no development interest to date on this site. A density of 75 du/acre was used to calculate a realistic capacity of 61 units.

6. ADEQUATE SITES

1000 EL CAMINO REAL AND RALSTON AVENUE AT EL CAMINO REAL, EMMETT'S PLAZA (SITE P)



APN	Address	Acres	Existing Use	Improv/ Land Ratio	Total Capacity	Building Age	Building Stories
045-182-250	1000 El Camino Real	0.94	Commercial retail and service uses strip mall	0.37	70	2000	1
045-182-260	Ralston Avenue at El Camino Real, Emmett's Plaza	0.07	public open space	0	6	N/A	N/A
TOTAL		1.01		0-0.37	76		

Site P includes two lots totaling 1.01 acres after consolidation and is currently zoned Village Corridor (VC) in the Belmont Village Specific Plan area. The larger parcel is currently used as a retail strip center with surface parking. The smaller lot at Ralston Avenue at El Camino Real is a City-owned site that is used as an open space plaza, which is intended as an interim use to allow for future redevelopment of the site when consolidated with the adjacent parcels. The site is proximate to the Belmont Caltrain Station. Given the low ILR and single-story buildings, the existing uses at this site are not considered an impediment to redevelopment. There has been no development interest to date on this site. A density of 75 du/acre was used to calculate a realistic capacity of 76 units.

883 RALSTON AVENUE (SITE Q)

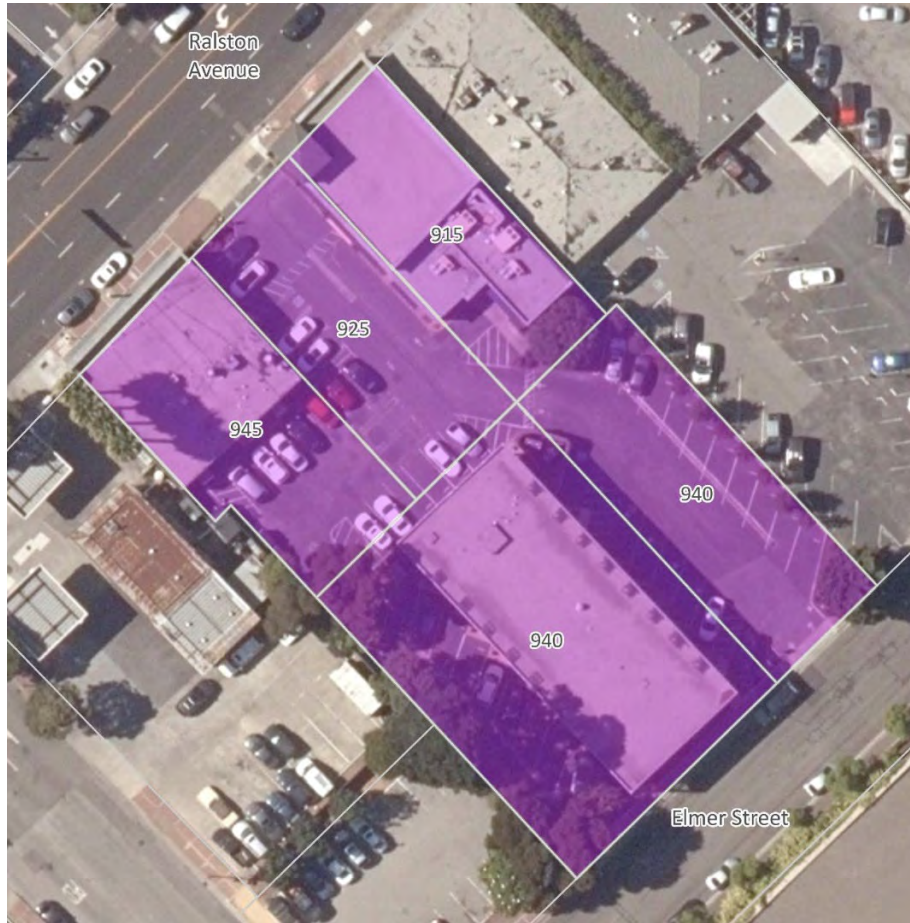


APN	Address	Acres	Existing Use	Improv/ Land Ratio	Total Capacity	Building Age	Building Stories
045-182-270	883 Ralston Avenue	0.61	Multi-unit restaurant/service retail	0.20	46	1958	1
TOTAL		0.61		0.20	46		

This housing site is 0.61 acres and is currently zoned Village Corridor (VC). This is an underutilized site and given the age of the building, low ILR, and single-story building the existing uses at this site are not considered an impediment to redevelopment. There has been no development interest to date on this site. A density of 75 du/acre was used to calculate a realistic capacity of 46 units.

6. ADEQUATE SITES

915-945 RALSTON AVENUE AND 940 EMMETT STREET (SITE R)



APN	Address	Acres	Existing Use	Improv/ Land Ratio	Total Capacity	Building Age	Building Stories
045-182-040	915 Ralston Avenue	0.13	Vacant retail	0.80	10	1970	1
045-182-030	925 Ralston Avenue	0.13	Retail store parking lot	0	10	N/A	N/A
045-182-200	940 Emmett Street	0.17	Office parking	0	12	N/A	N/A
045-182-210	940 Emmett Street	0.31	Professional Offices	0.46	23	1972	2
045-182-020	945 Ralston Avenue	0.15	Multi-unit commercial restaurant/service retail	0.54	12	1960	1
TOTAL		0.89		0-0.80	68		

This housing site is comprised of five lots totaling 0.89 acres after consolidation and is currently zoned Village Corridor (VC). The sites are owned by a single owner who has expressed interest in redeveloping the site. The buildings are over 50 years old and currently have vacancies, therefore the existing use should not be considered an impediment to redevelopment. A density of 75 du/acre was used to calculate a realistic capacity of 68 units. This site is similar to the 608 Harbor pipeline project, which consolidated four parcels resulting in a 0.71-acre site and 103 units.

1085 SIXTH AVENUE AND 995 RALSTON AVENUE (SITE S)



APN	Address	Acres	Existing Use	Improv/ Land Ratio	Total Capacity	Building Age	Building Stories
045-182-220	1085 Sixth Avenue	0.17	City Hall parking lot	0	13	N/A	N/A
045-182-010	995 Ralston Avenue	0.36	Gas station and auto repair	0.07	27	1974	1
TOTAL		0.53		0-0.07	40		

Site S includes two lots totaling 0.53 acres after consolidation and is currently zoned Village Corridor (VC). 1085 Sixth Avenue is a City-owned site which is being used as a parking lot on an interim basis pending future redevelopment. The adjacent property is a 50-year-old building used as a gas station and auto repair shop and has a very low ILR, therefore the existing uses should not be considered an impediment to redevelopment. There has been prior development interest in this site although no planning applications were submitted. A density of 75 du/acre was used to calculate a realistic capacity of 40 units.

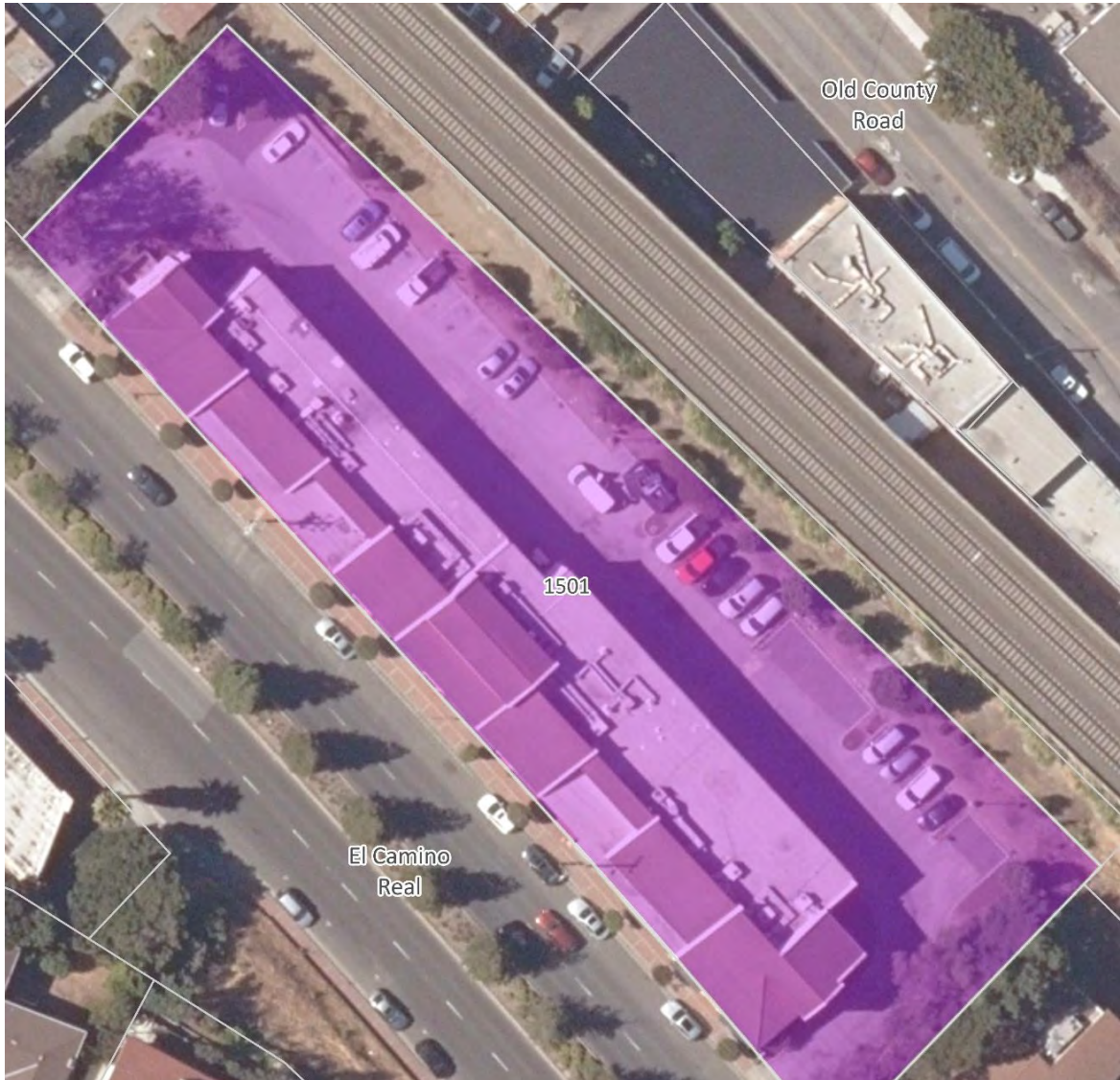
1520 El Camino Real and 1538 El Camino Real (Site T)



APN	Address	Acres	Existing Use	Improv/ Land Ratio	Total Capacity	Building Age	Building Stories
045-253-300	1520 El Camino Real	0.20	Used car lot	0.09	15	1959	1
045-253-290	1538 El Camino Real	0.47	Multi-unit retail and service uses strip mall	0.43	35	1988	1
TOTAL		0.67		0.09-0.43	50		

This housing site includes two lots totaling 0.67 acres after consolidation. 1520 El Camino Real is currently zoned Village Corridor Mixed Use (VCMU) and 1538 El Camino Real is currently zoned Corridor Mixed Use (CMU). The commercial strip mall at 1538 El Camino has several vacancies. Given the low ILR and single-story buildings, the existing uses at this site are not considered an impediment to consolidation and redevelopment. There has been no development interest to date on this site. A density of 75 du/acre was used to calculate a realistic capacity of 50 units.

1501 EL CAMINO REAL (SITE U)



APN	Address	Acres	Existing Use	Improv/ Land Ratio	Total Capacity	Building Age	Building Stories
045-252-080	1501 El Camino Real	1.02	Multi-unit commercial retail strip center	0.39	76	1980	1
TOTAL		1.02		0.39	76		

This housing site is 1.02 acres and is currently zoned Corridor Mixed Use (CMU). The property is used as a commercial retail strip center with both tuck-under and surface parking. The property currently has multiple vacant spaces. Given the age of the building and low ILR, the existing uses at this site are not considered an impediment to redevelopment. There has been no development interest to date on this site. A density of 75 du/acre was used to calculate a realistic capacity of 76 units.

6. ADEQUATE SITES

1601 EL CAMINO REAL (SITE V)



APN	Address	Acres	Existing Use	Improv/ Land Ratio	Total Capacity	Building Age	Building Stories
045-252-100	1601 El Camino Real	1.68	Multi-unit commercial retail strip center	0.20	126	1958	1
TOTAL		1.68		0.20	126		

This housing site is 1.68 acres and is currently zoned Corridor Mixed Use (CMU). This property is a commercial retail/office strip center with ample surface parking. There are currently several vacancies in the strip center. Given the buildings are over 60 years old, have a low ILR, are single-story, and have vacancies, the existing uses at this site are not considered an impediment to redevelopment. There has been no development interest to date on this site. This site is similar to the pending project at 580 Masonic Way, a 1.26-acre site with 139 units proposed and an ILR of 0.32. A density of 75 du/acre was used to calculate a realistic capacity of 126 units.

6.5 SITES SUMMARY

State Housing Element Law requires local governments to prepare an inventory of land suitable for residential development, including vacant sites, sites having the potential for redevelopment, and an analysis of the relationship of zoning, public facilities, and services to these sites. The inventory of land suitable for residential development must be used to identify sites that can be developed for housing within the planning period.

Table 6-11 summarizes the City of Belmont’s capacity to meet RHNA goals.

TABLE 6-11: SITES INVENTORY AFFORDABILITY BREAKDOWN

Housing Opportunity Sites	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Total
2023-2031 RHNA	488	281	283	733	1,785
Pipeline Projects	131	175	21	487	814
Pending Projects	63	13	11	122	209
Projected ADUs	0	0	90	0	90
<i>RHNA Credit Subtotal</i>	194	188	122	609	1,113
Opportunity Sites	322	184	186	484	1,176
Total	516	372	308	1,093	2,289
Buffer	28	91	25	360	504
Buffer %	6%	32%	9%	49%	28%

Source: City of Belmont, 2024.

RHNA BUFFER

In 2017, Senate Bill (SB) 166 was signed into law and included new “no net loss” provisions that require communities to provide an ongoing, adequate supply of land resources for housing development during the entirety of the housing element update planning period. These provisions mean communities face risks of non-compliance should a housing site be developed with non-residential uses, lower residential densities, or residential uses at affordability levels higher than anticipated by the housing element. To avoid non-compliance, HCD advises communities to “buffer” their assigned RHNA numbers. The City of Belmont proposes a 28% buffer of 504 housing units, bringing the City’s proposed potential development to 2,289 housing units, as shown in Table 6-11 above.

6. ADEQUATE SITES

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7

HOUSING GOALS, POLICIES, AND PROGRAMS

California Government Code Section 65583(b)(1) requires the Housing Element to contain “a statement of goals, quantified objectives, and policies relative to the maintenance, preservation, and development of housing.” Three types of statements are included in this section: goals, policies, and programs. Goals express broad, long-term statements for desired outcomes. The City has developed five goals pursuant to HCD requirements for the 6th Cycle relate to housing production, removal of constraints, housing preservation, promoting access to housing opportunities, and affirmatively furthering fair housing (AFFH).

Each goal is followed by policies intended to guide decision makers, staff, and other City representatives on how to achieve the goals. Specific programs are included to ensure the effective implementation of the policies. As required by law, quantified objectives have been developed for housing production, rehabilitation, and conservation. These are presented at the end of this section. The quantified objectives provide metrics for evaluating the effectiveness of the Element.

7.1 GOALS, POLICIES, AND IMPLEMENTING PROGRAMS

GOAL H1: PRODUCE NEW HOUSING AT ALL INCOME LEVELS, WITH A FOCUS ON AFFORDABLE HOUSING.

To meet the targets set by RHNA, the city will facilitate the production of abundant and affordable new housing in a wide diversity of unit types and sizes.

Policy H1.A: Provide adequate capacity to meet the Sites Inventory for Regional Housing Needs Allocation (RHNA).

Policy H1.B: Encourage a range of both market-rate and affordable housing in a variety of unit sizes and types to accommodate the varied housing needs of diverse households.

Policy H1.C: Coordinate with the local water and sewer agencies to assist in planning for adequate water and sewer service.

Program H1.1: Monitor Regional Housing Need Allocation and Residential Capacity.

To ensure sufficient residential capacity is maintained to accommodate the RHNA for each income category throughout the planning period, continue to implement a formal, project-by-project evaluation procedure pursuant to Government Code section 65863.

Quantified Objectives:

- The City will track the number of units that have been constructed at each income level and the number of units to be built on the identified site to determine the remaining site capacity by income category. The records will be updated continuously as developments are approved.
- If a development is being approved on an identified site at a lower density than what was assumed in the Housing Element, additional adequate sites must be made available within 180 days of approving the development.

Geographic Target: Citywide

Implementation Timeline: 2024 - 2031 ongoing as projects are approved

Responsible Body: Housing and Planning Divisions

Funding Source(s): Community Development Department Budget

Program H1.2: Use Public Funding for Low/Moderate Income Housing. Use City affordable housing funds to produce additional affordable housing projects and to leverage other regional, state, and federal funding sources to support the construction of affordable housing.

Quantified Objectives:

- The City shall utilize local Affordable Housing Funds (Successor Agency Housing Funds, Inclusionary housing in-lieu funds, Commercial Linkage Fees, and Residential Development Mitigation Fees) to fund affordable housing development, and to leverage other public funding sources for affordable housing projects. Priority shall be given to development of housing at lower-income levels.
- Available and projected Affordable Housing Funds can leverage the production of 100 units during the planning period.

Geographic Target: Citywide

Implementation Timeline:

- 2024-2031 (Ongoing as developers apply for affordable housing projects).

Responsible Body: Housing Division

Funding Source(s): Affordable Housing Funds

Program H1.3: Water and Sewer Providers. Ensure immediate delivery of the Housing Element to water and sewer providers to facilitate streamline reviews and ensure adequate capacity for housing projects.

Quantified Objectives:

- Water and sewer service providers must establish specific procedures to grant priority water and sewer service to developments with units affordable to lower-income households based on jurisdictions' Housing Element's RHNA allocation (Gov. Code, Section 65589.7.) The City will immediately deliver the housing element to water and sewer service providers.

Geographic Target: Citywide

Implementation Timeline:

- Upon adoption in Spring 2024, the City will immediately send the Housing Element to applicable water and sewer providers.

Responsible Body: Planning Division

Funding Source(s): Community Development Department Budget

Program H1.4: Establish By-Right Housing Designation for Prior Housing Sites. Designate housing sites that have carried over from the prior Housing Element to allow housing development by-right consistent with State law.

Quantified Objectives:

- Amend the Zoning Code to establish a "by-right" designation for housing sites reused from prior Housing Elements for housing projects that propose a minimum of 20% affordable units.

Geographic Target: Specific Sites

Implementation Timeline:

- Completed in January 2024.

Responsible Body: Planning Division

Funding Source(s): Community Development Department Budget

Program H1.5: Facilitate Pipeline and Pending Projects. The City will facilitate and support pipeline and pending projects during the planning period by working with applicants to ensure reviews are done in a timely manner, providing technical assistance, and limiting public meetings as required by SB 330. As needed, the City will provide incentives or additional assistance like expediting project review, supporting funding applications, and working to avoid unnecessary delays in processing of the applications.

Quantified Objectives:

- For each housing project, maintain a designated project planner and engineer, as well as a senior manager from both the Community Development Department and Public Works Department to help facilitate the project and monitor progress.
- 1,023 units (including 194 very low-, 188 low-, 32 moderate-, and 609 above-moderate income units) constructed by end of planning period

Geographic Target: Citywide

Implementation Timeline:

- Ongoing

Responsible Body: Planning Division

Funding Source(s): Community Development Department Budget

GOAL H2: PRESERVE EXISTING HOUSING THAT IS AFFORDABLE TO LOWER- AND MIDDLE-INCOME RESIDENTS.

As the City continues to grow, it remains important to maintain and preserve existing affordable housing as well as non-deed restricted housing that is naturally affordable for middle and lower-income households.

Policy H2.A: Continue to monitor, track, and encourage preservation of affordable housing at-risk of loss or conversion to market rate housing.

Policy H2.B: Continue partnering with housing service organizations to preserve existing affordable housing.

Policy H2.C: Invest funding into the purchase and preservation of affordable housing.

Program H2.1: Support Retention of Existing Lower-Income Units. Preserve “at-risk” affordable units through monitoring and partnering, working with nonprofits, and exploring available funding sources to preserve affordability. This activity will include both units in all affordable developments with expiring deed restrictions, as well as potential BMR units that are reaching the end of the term.

Quantified Objectives:

- Advertise units going to sale to nonprofits.
- Outreach and negotiate with owners for affordability extensions.
- Provide tenant education and affirmatively market available units to affected tenants.
- Objective: 106 units over the cycle.

Geographic Target: Citywide

Implementation Timeline:

- Annually, at the time of APR preparation, review the list of potentially at-risk units within the next ten years. In addition, in Q1, reach out to any owners regarding potential affordability extensions. Assist in the provision of tenant education by owners and nonprofit stakeholders. Liaise with nonprofits in Q2 to update them on potential acquisition opportunities. Ensure compliance with State Preservation Notice Law.
- In Q1 2025, draft preferences for any new affordable projects for displaced tenants in at-risk properties. Bring recommended language to CC for adoption in Q4 2025 and implement in Q1 2026.

Responsible Body: Housing Division

Funding Source(s): Housing Division Budget

Program H2.2: Manage Portfolio of Deed Restricted Affordable Units. The City will formalize its method of managing the City's deed restricted units by identifying a service provider or developing additional staff capacity.

Quantified Objective:

- Review best practices and evaluate staff resources to manage the portfolio of units. Make a determination on the best way to manage the units.
- If the outside provider approach is selected, develop a Request for Proposals to distribute to Bay Area service providers to manage existing and new affordable units, both for sale and rental; select a provider and begin transitioning this work to the provider.

Geographic Target: Citywide

Implementation Timeline:

- In Q3 2024, conduct analysis and determine whether to proceed with a service provider or staff approach.
- If a service provider approach is selected, launch RFP in Q1 2025; select provider and implement program in Q4 2025.

Responsible Body: Housing Division

Funding Source(s): Housing Division Budget

Program H2.3: Require Replacement Units. Adopt a policy requiring replacement units subject to the requirements of Government Code Section 65915 (c)(3) when new development occurs on a housing inventory site which currently has or within the past five years had residential uses (existing, vacated or demolished) and was legally restricted to low-income households, or subject to price control, or occupied by low-income households. Require that demolition permits include an assessment of rents to determine income status and plan to replace lost lower-income units.

Quantified Objectives:

- Adopt a policy requiring new housing development to replace all affordable housing units lost due to new development on site, at equal or greater levels of affordability.

Geographic Target: Citywide

Implementation Timeline:

- Conduct best practices review beginning in Q1 2025 on replacement options that would extend past 2034, including conferring with neighboring jurisdictions interested in the same outcomes; bring recommendations to City Council in Q3 2025 and implement approved policy in Q4 2025.

Responsible Body: Housing Division

Funding Source(s): Housing Division Budget

Program H2.4: Rehabilitation of Existing Housing Occupied by Lower-Income Households. The City will partner with and provide financial assistance, outreach, or resources to support housing service organizations and/or non-profit organizations that help preserve existing housing that is affordable to lower-income residents by providing home repairs and energy-efficiency improvements for low-income households.

Quantified Objectives:

- Establish partnerships with organizations that provide repair and energy-efficiency improvements for properties occupied by low-income residents, such as Peninsula Clean Energy, El Concilio of San Mateo County, and Rebuilding Together Peninsula, and explore opportunities to increase their reach in Belmont through enhanced financial assistance and targeted outreach to lower-income households.
- Continue to coordinate with housing service providers, non-profit housing developers, and affordable housing property managers to support their rehabilitation efforts.
- 20 units occupied by low-income households over the cycle will undergo energy-efficiency improvements or home repairs.

Geographic Target: Citywide

Implementation Timeline:

- Outreach to housing service providers bi-annually to confer on resources available and opportunities for partnerships, beginning in Q4 2024.

Responsible Body: Housing Division

Funding Source(s): Affordable Housing Funds

Program H2.5: Preserve Existing Affordable Units. Develop a plan to preserve the City's affordable units that will expire in the next decade to keep them affordable long term.

Quantified Objectives:

- Work with property owners of existing assisted housing developments for lower-income households and partner with nonprofits to determine methods to extend affordability covenants to preserve affordable units, including assistance from the City.
- Conduct best practices research on other jurisdictions' programs and prepare recommendations to City Council.

Geographic Target: Citywide

AFFH Action Area: Protect existing residents from displacement

Implementation Timeline:

- Conduct best practices work in Q3 2025; bring recommendations to Council in the Q1 2026; implement program by mid-2026.

Responsible Body: Housing Division

Funding Source(s): Affordable Housing Funds

GOAL H3: PROMOTE ACCESS TO HOUSING OPPORTUNITIES FOR LOW-INCOME HOUSEHOLDS AND PERSONS WITH SPECIAL HOUSING NEEDS.

The city can improve access to housing for all income groups and special needs communities by providing education and information on specific programs and affordable housing opportunities offered locally, regionally, and by the state.

Policy H3.A: Increase access to homeownership opportunities for lower income households.

Policy H3.B: Increase access and awareness of housing programs and affordable housing unit availability through use of new technology as part of a robust and proactive public outreach strategy.

Program H3.1: Home Ownership Financing. Support access to home ownership opportunities and connect potential homeowners to financing sources specifically targeted to first time homebuyers or affordable housing units.

Quantified Objective:

- Partner with housing organizations and financing stakeholders to host at least one first time homebuyer workshop in Belmont during the planning period.

Geographic Target: Citywide

Implementation Timeline:

- In Q3 2025 and every three years after, partner with stakeholders, including HEART, to offer first time homebuyer workshops in Belmont.

Responsible Body: Housing Division

Funding Source(s): Housing Division Budget

Program H3.2: Continue to Participate in Countywide Below Market Rate Unit Web Portal. San Mateo County and multiple other jurisdictions collaborate on a web portal that includes affordable housing units available for rent, online applications, and access to the waitlist for future units.

Quantified Objective:

- Support the County in maintaining online portal for a BMR applications and waitlist.
- Promote the County's online portal through the City's website.
- Modify developer agreements when appropriate to require developers to use the Countywide portal.

Geographic Target: Citywide

Implementation Timeline: Ongoing as projects complete construction

Responsible Body: Housing Division and San Mateo County

Funding Source(s): Housing Division Budget

GOAL H4: REMOVAL OF CONSTRAINTS OF THE PRODUCTION OF HOUSING.

The city can further the production of housing to meet RHNA goals by eliminating governmental policies or regulations that unnecessarily constrain the development or improvement of market-rate or affordable housing.

Policy H4.A: Periodically review and update the Zoning Ordinance to remove language that constrains development and stay abreast of updates to State law to reduce constraints to emergency shelters, low barrier navigation centers, supportive housing, and group homes.

Policy H4.B: Reduce constraints to housing development by increasing floor area ratios and density, waiving lot consolidation permit fees, and reducing parking requirements.

Policy H4.C: Provide clear and transparent information on the City’s website regarding development standards, the development review process, and associated fees.

Program H4.1: Update Zoning Code to Increase Floor Area Ratios and Density.

Modify the Zoning Ordinance to allow for increased floor area ratios and density to better facilitate development projects.

Quantified Objectives:

- Modify the Corridor Mixed Use (CMU) zoning district to increase the maximum allowed Floor Area Ratio (FAR) from 1.75 (2.2 with community benefits) to 2.0 (2.5 with community benefits), and to eliminate the maximum residential density metric.
- Modify the Village Station Core (VSC) zoning district to increase the maximum allowed FAR from 1.5 (2.0 with community benefits) to 2.0 (2.5 with community benefits).

Geographic Target: CMU and VSC districts

Implementation Timeline:

- Completed in January 2024

Responsible Body: Planning Division

Funding Source(s): Community Development Department Budget

Program H4.2: Zoning Code Amendments to Remove Constraints. The City will annually review, and amend as necessary, the Zoning Code to ensure consistency with State Housing Government Code requirements and remove or lessen constraints on new housing development, pertaining to, but not limited to:

- **Emergency Shelters:** Ensure full compliance with State laws pertaining to housing for homeless persons, including removing the following constraints:
 1. Define emergency shelters to include associated uses such as low barrier navigation centers, bridge housing, respite/recuperative care, and other inclusive terms for shelters.
 2. Update parking requirements to comply with AB139/Government Code section 65583, subdivision (a)(4)(A), AB 2339, and any other parking requirements.
 3. Increase the maximum number of beds allowed by-right in the S-2 Combining District to 20, with a commitment to review this limit in 2027 based on updated homeless population counts to determine if the limit should be increased.

- **Permanent Supportive Housing.** Amend the Zoning Code to ensure consistency with AB 2162 by allowing by-right 100% affordable housing that has 25% or 12 units of permanent supportive housing, where multi-family or mixed-use housing is permitted.
- **Transitional and Supportive Housing.** Amend the Zoning Code to permit transitional housing and supportive housing as a residential use in all zones allowing residential uses and only subject to those restrictions that apply to other residential dwellings of the same type in the same zone. (Gov. Code, Section 65583, subd. (c)(3).)
- **Low-Barrier Navigation Centers:** Amend the Zoning Code to allow low-barrier navigation centers for the homeless by right in zones that allow for mixed-use and nonresidential zones permitting multi-family uses, per Government Code Section 65662.
- **Density Bonus:** Comply with changes in California's density bonus law (Government Code Section 65915, as revised) and promote the density bonus through the City website and/or informational brochures that will be displayed at the City's Permit Center.
- **Residential Care Facilities:** Amend the Zoning Code to ensure definition of residential care facilities and small residential care facilities continue to comply with State law, and amend the zoning code to eliminate the requirement for a use permit for care facilities of seven or more persons with a disability, and allow them in all zones allowing residential uses based on objective criteria to facilitate approval certainty, except in areas where this conflicts with the San Carlos Airport Land Use Plan.
- **Reasonable Accommodation:** Amend the Zoning Code to ensure certainty and eliminate discretionary review.
- **Definition of Family:** Amend the Zoning Code definition of "Family" to remove the reference to "internally structured relationship" and instead define a family as one or more persons living together in a dwelling unit, with common access to, and common use of all living, kitchen, and eating areas within the dwelling unit.
- **Mobile Homes:** Amend the Zoning Code to allow mobile home parks as a special use in all residential zones, consistent with Government Code Section 65852.7.
- **Farmworker Housing:** Amend the Zoning Code to define "farmworker housing" and allow it within the districts to be determined, consistent with State requirements.

Quantified Objectives:

- Adopt Zoning Code amendments.

Geographic Target: Citywide

Implementation Timeline:

- Amend the Zoning Code by Q4 2024.
- Review State Density Bonus law annually and update Zoning Code within 6 months of review, as needed.

Responsible Body: Planning Division

Funding Source(s): Community Development Department Budget

Program H4.3: Lot Consolidation Fee Waivers. Waive the permit fees for subdivisions actions to consolidate lots for housing development projects with at least 20% very low- and/or extremely low-income units.

Quantified Objectives:

- Bring proposal to City Council to waive lot consolidation permit fees for developments with at least 20% very low- and/or extremely low-income units.

Geographic Target: Citywide

Implementation Timeline:

- City Council review draft policy in Q3 2026. Adopt policy in Q4 2026.

Responsible Body: Planning Division

Funding Source(s): Community Development Department Budget

Program H4.4: Reduce Parking Requirements. Reduce parking requirements in certain residential zoning districts.

Quantified Objectives:

- The City will modify the parking requirements in the R-2, R-3, and R-4 zoning districts to reduce parking requirements consistent with other multi-family zoning districts (CMU, RC, Village Districts). It should also be noted that since January 2023, Assembly Bill 2097 has prohibited all Cities from enforcing minimum parking standards on properties within one half mile of public transit. A large majority of R-2, R-3, and R-4 properties are located within one half mile of public transit and will not be subject to minimum parking standards.

Geographic Target: R-2, R-3, and R-4 zoning districts

Implementation Timeline:

- Beginning in Q1 2025, develop code amendments to reduce parking requirements in the R-2, R-3 and R-4 zoning districts to be consistent with other multi-family zoning districts.
- Bring recommended changes to PC in Q4 2025 and to CC in Q1 2026 for approval. Implement in Q2 2026.

Responsible Body: Planning Division

Funding Source(s): Community Development Department Budget

Program H4.5: Evaluation of Zoning Constraints. While the City's development standards have proven to not be a constraint to housing development in recent years, it is important to continue to evaluate their effectiveness during the planning period. The City will monitor and analyze the interrelationship between the zoning standards, objective design standards, and State Density Bonus to identify and remove constraints to housing development. In addition, the City will conduct a peer agencies evaluation of zoning standards such as height and open space requirements as part of the analysis.

Quantified Objectives:

- Maintain a list of housing applications and use of State Density Bonus law with particular attention to what concessions/incentives and waivers developers are requesting.
- Monitor how developers are applying the City's Objective Design Standards and track feedback from developers on any standards that are difficult to implement.
- Monitor applications for Conditional Use Permits for ground floor residential to determine if the current provisions are appropriate to maintain the City's goal of supplying commercial uses to serve the growing residential population and are not a barrier to housing development.
- Conduct a review of peer cities to confirm that Belmont's zoning standards are in line with other cities that support diverse housing opportunities. The review will also include consulting and considering feedback from local and regional market rate and affordable housing developers.
- If the resulting analysis identifies opportunity to remove additional constraints, complete zoning code amendments to remove those constraints.

Geographic Target: Citywide in zoning districts that allow multi-family housing

Implementation Timeline:

- Ongoing from 2024-2031, maintain list of how Density Bonus is applied, feedback from developers on feasibility of the adopted Objective Design Standards, and applications for Conditional Use Permits for ground floor residential uses.
- Peer agency and developer evaluation completed in Q4 2026.
- If zoning amendments are necessary to remove constraints, adopt by Q2 2027.

Responsible Body: Planning Division

Funding Source(s): Community Development Department Budget

Program H4.6: Update the City's Webpage to Provide Enhanced Information for Housing Developers. Provide a clear summary of procedures, development standards, and fees for housing development on the Community Development webpage.

Quantified Objectives:

- Create and maintain a developer resources page to make it easier to navigate the City's development process; include updated development and impact fees consistent with State law.
- Prepare written procedures for SB 35 projects. Update the City's website with information and resources for SB 35 streamlined ministerial review, including providing a Notice of Intent form.

Geographic Target: Citywide

Implementation Timeline:

- Update the City's website annually in Starting in Q2 2024 to provide transparency on development fees, standards, and SB 35 streamlining.

Responsible Body: Planning Divisions

Funding Source(s): Community Development Department Budget

Program H4.7: Monitor Commercial Development in Mixed-Use Districts. The City will continue monitoring commercial development in mixed-use districts and if the City find that the trends are shifting or incentivizing 100% commercial, the City will review and take action as necessary.

Quantified Objectives:

- Maintain a list of development applications in Commercial Mixed-Use districts with particular attention to whether or not commercial development is being proposed as a mixed-use or as a stand-alone use.
- Analyze whether zoning amendments or other development incentives are needed to encourage residential development in these zones and implement changes within one year of shift in development trends towards 100% commercial projects.

Geographic Target: Commercial Mixed-Use Districts

Implementation Timeline:

- Analyze development trends on an annual basis starting in Q4 2024. If changes are needed, implement and/or adopt within one year of shift in development trends towards 100% commercial projects

Responsible Body: Community Development Department

Funding Source(s): Community Development Department Budget

GOAL H5: PROMOTE FAIR HOUSING ACCESS AND EQUAL OPPORTUNITIES FOR ALL PERSONS (SEE FAIR HOUSING ACTION PLAN IN CHAPTER 3, AFFH SUMMARY).

AFFH policies and programs increase the variety of housing types geographically distributed throughout the city, prevent displacement of low-income communities of color, and address identified fair housing issues to foster an inclusive community.

Policy H5.A: Increase awareness of and support the enforcement of laws and regulations prohibiting discrimination in lending practices and in the sale or rental of housing.

Policy H5.B: Increase available financial resources for affordable housing in order to better fund efforts to foster stable residential integration and increased access to opportunity. Increase integration by increasing the supply of affordable housing for families in higher opportunity areas.

Policy H5.C: Improve communications and coordination between jurisdictions, service providers, and agencies in the County.

Policy H5.D: Reduce the displacement of low-income communities of color by enhancing protections for vulnerable tenants and homeowners.

Policy H5.E: Continue to support local programs with a proven track record of assisting Belmont residents and workers to find housing.

Policy H5.F: Encourage housing development on properties with religious institutions and educational uses.

Policy H5.G: Increase the production of a variety of housing types in single-family neighborhoods throughout the City.

Policy H5.H: Strengthen ADU and SB9 Monitoring and Outreach Programs to encourage units with a demographic range of occupants.

Program H5.1: Update Website to Improve Access to Fair Housing Information and Housing Services. Increase community outreach and availability of fair housing resources and other housing services in multiple languages through the City's Housing webpage. Advertise two existing HIP Housing programs with a track record of assisting Belmont residents and workers: 1) The *Self Sufficiency Program* provides subsidized rent and support services to low-income parents or emancipated foster youth who are in school to increase their earning power and become financially self-sufficient within 1-5 years; and 2) The *Housing Readiness Program* supports people who contact HIP to help them become more "housing ready" including housing resources, assistance completing housing applications, and offering activities that help prepare people to access housing.

Quantified Objectives:

- Maintain and improve webpage with comprehensive housing related information and materials for low-income households seeking housing opportunities, and coordinate with providers to market programs electronically.
- Provide an easy way for residents and property owners to find information on fair housing laws, rights, and responses (e.g., filing a complaint and ensuring property owners do not violate fair housing laws) on the City's website.
- Provide information in multiple languages.
- Conduct a best practices review of other jurisdictions' websites. Update Belmont's website to contain fair housing resources and information on how to connect with housing services.
- Update website quarterly and promote through City newsletter.
- On an annual basis, maintain an average of two families in the *Self Sufficiency Program*, and two households in the *Housing Readiness Program*.

Implementation Timeline:

- Complete best practices review by Q1 2025; complete website update by Q2 2025, update quarterly thereafter.

Responsible Body: Housing Division

Funding Source(s): Housing Division Budget

Program H5.2: Coordinate with other jurisdictions and agencies in the County to advance AFFH goals. San Mateo County has a proven track record of collaboration between jurisdictions. As cities move towards more active efforts to further fair housing, there are new opportunities to collaborate.

Quantified Objectives:

- Attend regular meetings with 21 Elements (with planners and housing staff), 21 Directors (with Community Development Directors) and Housing Managers group.
- Collaborate with peer jurisdictions to implement Housing Element Programs that would benefit from efficiencies of scale.

Implementation Timeline:

- Attend meetings as scheduled, typically every other month for each group.

Responsible Body: Planning and Housing Divisions

Funding Source(s): Housing Division Budget

Program H5.3: Modify the Inclusionary Housing Program. Adjust the City's Below Market Rate (Inclusionary) Program to provide pathways for the construction of

affordable units that address the needs of residents with extremely low and very low incomes who face very high rates of cost burden in the city.

Quantified Objectives:

- Expand the variety of housing units produced under the inclusionary housing program.
- Perform a feasibility analysis to redesign the program to allow a menu of options to produce units at different below market income levels.

Geographic Target: Citywide

Implementation Timeline:

- Complete feasibility analysis by Q4 2025; adopt redesigned program by Q1 2026.

Responsible Body: Planning and Housing Divisions

Funding Source(s): Community Development Budget

Program H5.4: Work with Housing Developers to Affirmatively Market Housing to Households with Disproportionate Housing Needs. The City actively supports collaboration between the private sector and service providers to connect persons in need of housing with new housing opportunities. Special attention will be paid to Black and Hispanic households that are more cost burdened and persons with disabilities.

Quantified Objectives:

- Establish a list of community service providers to distribute to developers of affordable housing.
- Coordinate with developers to ensure organizations are notified when new affordable housing becomes available.
- Partner service provider agencies to receive and respond to 30 intake calls per year from Belmont residents.
- Require developer agreements and affordable housing agreements to require affirmative marketing of below market rate units to households with higher needs.
- Require developers to affirmatively market approximately 640 very low-income and low-income housing units (based on the number of units anticipated to be constructed during the 8-year planning period, excluding those already completed as of May 2024) to households with disproportionate housing needs.
- Target 15% of below market rate units to be occupied by households with disproportionate housing needs.

Geographic Target: All projects that include affordable units.

Implementation Timeline:

- Establish list of service providers by Q4 2024 and update annually thereafter.

- Ongoing as projects are processed, review developer marketing plans to ensure affirmative marketing is included.

Responsible Body: Housing Division

Funding Source(s): Housing Division Budget

Program H5.5: Provide Fair Housing Training for Landlords and Tenants. Partner with Project Sentinel to provide training with a focus on tenant’s rights, race-based discrimination, and reasonable accommodations.

Quantified Objectives:

- Increase awareness of fair housing laws and tenants' rights to reduce unlawful discrimination and displacement.
- Partner with Project Sentinel to provide training every two years. Market training through direct outreach to landlords and through local service providers to reach tenants and enroll 10 residents in each training.
- Conduct a City Council study session on fair housing laws and available resources and notify at least 10 large multifamily property owners and five service providers to encourage participation in the meeting.

Geographic Target: Citywide

Implementation Timeline:

- Ongoing annual check in with Project Sentinel.
- Provide training in 2025 and every two years thereafter.
- Conduct a City Council study session in Q3 2025.

Responsible Body: Housing Division, Project Sentinel

Funding Source(s): Housing Division Budget

Program H5.6: Expand Tenant Protections. The City will extend tenant protections to address displacement and relocation costs.

Quantified Objectives:

- Extend AB1482 provisions to require tenant relocation payments for No Fault evictions for those with tenure less than one year.
- Explore tenant protection policies that require documentation from landlords who use substantial remodel exemption to evict tenants.
- Establish Right to Return policy for tenants displaced from homes due to demolition or substantial remodels.
- Conduct proactive outreach to tenants and tenant groups and engage with 30 rental households a year on tenant protection policies and available resources.

Geographic Target: Citywide

Implementation Timeline:

- In Q4 2025, draft extended tenant protections provisions and research policy provisions for substantial remodel exemptions and right of return policies. Bring recommended language to City Council in Q1 2026.
- Conduct proactive outreach to tenants and tenant groups bi-annually.

Responsible Body: Housing Division

Funding Source(s): Housing Division Budget

Program H5.7: Continue Financial Support of Existing Home Sharing Program. The City will continue to provide financial support for the HIP Housing *Home Sharing Program* that matches individuals seeking housing with people who have a room or ADU to rent.

Quantified Objectives:

- Provide financial support each fiscal year through 2031 in the amount of \$5,000.
- Meet annually with HIP staff to discuss outreach methods and opportunities to reach underserved populations.
- On an annual basis, maintain an average of eight (8) households in a Home Sharing match.
- Match three (3) new residents per year with a housemate.

Geographic Target: Citywide, with an emphasis in low-density neighborhoods.

Implementation Timeline:

- City will grant funding as part of annual budget process.
- Meet with HIP Housing within one year of Housing Element Certification and annually thereafter.

Responsible Body: Housing Division

Funding Source(s): Housing Division Budget

Program H5.8: Facilitate Development of Housing on Institutional Properties. Conduct direct outreach and provide technical assistance to religious institutions and private schools to encourage development of housing on their sites.

Quantified Objectives:

- Conduct direct outreach to religious institution site owners or operators to inform them about SB4 (California Government Code Section 65913.16) that allows by-right processing of certain affordable housing projects and any other regulations that encourage housing development on these sites.

- Conduct direct outreach to site owners or operators of private schools to discuss the feasibility of developing housing on their sites.
- Provide technical assistance to religious and educational institutions including offering meetings, assigning a dedicated planner, assisting with development feasibility studies, and connecting institutions with potential developers or design professionals to help expedite the process. As appropriate provide incentives for development such as streamlined review and financial assistance for affordable projects.

Geographic Target: Specific sites citywide with an emphasis in low-density neighborhoods.

Implementation Timeline:

- Reach out to each religious institution site owner or operator within one year following Housing Element certification and annually thereafter.
- Provide mailed notifications to religious institutions within six months of the adoption of any new State legislation that reduces barriers to development of religious institution sites.
- Reach out to each private school site owner or operator within one year following Housing Element certification and annually thereafter.

Responsible Body: Housing and Planning Divisions

Funding Source(s): Housing Division Budget and Affordable Housing Fund

Program H5.9: Amend Zoning Code to Facilitate Production of ADUs and SB9 units.

Adopt zoning code amendments to facilitate production of additional ADUs and SB9 units in single-family neighborhoods.

Quantified Objectives:

- Complete zoning ordinance amendments to allow ADUs and SB9 units up to 1,200 square feet on single-family properties 10,000 square feet or greater. This would complement State law by allowing larger ADUs on larger properties spread throughout the city.
- Complete zoning ordinance amendments to allow all properties zoned single-family to convert from one unit to two units within the existing building envelope through a ministerial process. This would complement SB9 law by allowing greater flexibility in unit sizes. SB9 captures the division of existing homes to two units up to 800 square feet per unit. This program would allow any existing home to be divided into a duplex, regardless of the unit sizes. The property owner would also be allowed to build an ADU and JADU (for a total of 4 units).

Geographic Target: Citywide, with an emphasis in low-density neighborhoods.

Implementation Timeline:

- Complete zoning ordinance amendments and establish policies and procedures to facilitate these types of projects within one year following Housing Element Certification.

Responsible Body: Community Development Department

Funding Source(s): Community Development Department Budget

Program H5.10: Provide Financial Support for ADUs that Serve Lower-Income Households. Establish a grant or loan program to support low-income homeowners to construct ADUs or incentivize homeowners to construct ADUs affordable to lower income households.

Quantified Objectives:

- Analyze best practices for establishing an effective grant or loan program for ADUs.
- Participate in Countywide ADU Resource Center process for developing a loan/grant program and determine whether Countywide program meets the City's needs and objectives.
- Finalize program and conduct outreach through the City website and newsletter, as well as local service providers.
- Target five grants/loans for five households during the planning period. Target special needs populations such as seniors, persons with disabilities, and large households.

Geographic Target: Citywide, with an emphasis in low-density neighborhoods.

Implementation Timeline:

- Participate in Countywide process in 2024.
- Establish a grant or loan program by Q4 2025.

Responsible Body: Housing Division

Funding Source(s): Affordable Housing Fund

Program H5.11: Conduct Outreach to Encourage ADU and SB9 Unit Production. Strengthen ADU and SB9 outreach programs to encourage a range of unit sizes, with a demographic range of occupants, that are geographically dispersed throughout the city.

Quantified Objectives:

- Perform analysis and identify areas of the city with the highest potential for the addition of ADUs and JADUs due to sloping lots that create underfloor area prime for conversion to living area. Conduct direct outreach to those property owners and provide technical assistance. Target special needs populations such as seniors, developmentally disabled, and large households.

- Establish an online plans gallery to allow property owners to access pre-reviewed ADU plans that can be downloaded for free or purchased from the designer. Homeowners will be able to search for specific types and sizes of ADUs to meet a variety of needs.
- Participate in Countywide ADU Resource Center to facilitate coordinated, high-quality outreach and technical assistance.
- Create high-quality outreach materials including website updates, handouts, FAQs and application forms. Include materials targeted toward homeowners, rather than just design professionals.
- Conduct annual outreach to all ADU/JADU/SB9 property owners with HIP Housing information to encourage rental to a range of households (not just friends and family).

Geographic Target: Citywide, with an emphasis in low-density neighborhoods

Implementation Timeline:

- Conduct analysis and outreach related to units on sloped sites in Q2 2025.
- Join ADU Resource Center and launch online plans gallery in Q3 2024.
- Create new outreach materials in Q1 2025.
- Conduct outreach to all ADU/JADU/SB9 owners within 9 months of Housing Element Certification and annually thereafter.

Responsible Body: Community Development Department

Funding Source(s): Community Development Department Budget

Program H5.12: Create an AFFH Monitoring Program. Create an AFFH Monitoring Program to encourage units with a demographic range of occupants that are geographically dispersed throughout the city.

Quantified Objectives:

- The City hopes to achieve 120 units (above the RHNA) of which 50% would be low and moderate income through Housing Mobility Programs H5.3, H5.8, H5.9, H5.10, H5.11, and H5.12.
- Create a master list of all ADUs, JADUs, and SB9 units and map them to allow monitoring of their location throughout the city.
- Establish an ADU monitoring and reporting program, including mapping of location in the city, progress on ADU production, affordability, and geographical distribution.
- Monitor the distribution of ADUs and SB9 units. If ADUs and SB9 units are concentrated in certain areas of the city, analyze constraints and adjust outreach techniques to encourage distributed units.

- Assess by mid-cycle (2027) if ADU and JADU production is meeting the City's 6th cycle RHNA goals. If not, consider additional efforts such as reducing process and permitting fees to incentivize production. If trends indicate a potential substantial shortfall in meeting the estimated ADUs in the sites inventory, consider additional efforts to incentivize ADU production and reassess and revise the overall sites strategy for the RHNA by 2027 through adjusting ADU capacity assumptions with actual permitted units, and/or identifying additional sites for consideration to expand site capacity to the extent necessary to accommodate the RHNA.

Geographic Target: Citywide, with an emphasis in low-density neighborhoods.

Implementation Timeline:

- Create a list and map of existing ADUs, JADUs and SBg units within six months of Housing Element adoption.
- Participate in regional process to establish an ADU monitoring program on timing they set forward.
- If ADU production does not meet target, consider additional efforts such as reducing process and permitting fees to incentivize production in 2027.

Responsible Body: Community Development Department

Funding Source(s): Community Development Department Budget

QUANTIFIED OBJECTIVES

The quantified objectives section estimates the number of units likely to be constructed, rehabilitated, or conserved/preserved by income level during the 2023-2031 planning period. The quantified objectives do not represent a ceiling on development, but rather set a target goal for the jurisdiction to achieve, based on needs, resources, and constraints.

According to HCD, the sum of the quantified objectives for the programs should ideally be equal to or surpass the community's identified housing needs. However, State law recognizes that the total housing needs identified may exceed available resources and the community's ability to satisfy this need within the context of the general plan. Under these circumstances, the quantified objectives need not match the identified existing housing needs but should establish the maximum number of housing units that can be constructed, rehabilitated, and conserved over an eight-year time frame. The quantified objectives do not necessarily meet the goals of RHNA because they are not a full projection of anticipated housing development within the Housing Element Cycle. It is an estimate of actual production, given available resources and projected pipelines projects.

With respect to affordable units, the City has estimated the potential subsidies available during the planning period and has calculated the potential number of units that could be developed using assistance from these funds. In addition, staff has compiled a list of known or expected

development projects that are anticipated to be completed within the next eight years. The City is not aware of any pending housing preservation or rehabilitation projects.

Based on residential building permits issued in the last year and residential projects that have been initially reviewed or approved by the Planning department that have not been built, the quantified objective for non-subsidized pending and pipeline projects in above-moderate-income projects is 606 units. The total quantified objectives for the 2023-2031 planning period are outlined in Table 7-1. Table 7-2 includes quantified objectives for housing production and how they align with the City's overall RHNA.

TABLE 7-1: QUANTIFIED OBJECTIVES FOR CYCLE 6 (2023 – 2031)

	ELI	VLI	LI	MOD	Above MOD	Total
Conservation	30	30	20	0	0	80
Rehabilitation	5	5	10	0	0	20
Preservation	0	0	104	2	0	106
Housing Production						
Housing Mobility Programs	10	10	40	60	0	120
Pipeline Projects Subsidized by the City	69	62	94	0	3	228
Other Pipeline Projects	0	0	81	0	484	565
Pending Projects	17	46	13	11	122	209
Housing Inventory Sites	126	126	154	186	484	1,076
Housing Inventory Sites Projected to be Subsidized by the City	35	35	30	0	0	100
Pipeline and Projected ADUs	0	0	0	111	0	111
Subtotal Housing Production Units	257	279	412	368	1,093	2,409
TOTAL	292	314	546	370	1,093	2,615

Source: City of Belmont, 2024.

TABLE 7-2: HOUSING PRODUCTION QUANTIFIED OBJECTIVES ALIGNMENT WITH BELMONT'S RHNA

Income Level	Housing Production Quantified Objective	Eight-Year RHNA Figure	% of RHNA to be Produced
Extremely and Very Low-Income	536	488	110%
Low-Income	412	281	147%
Moderate-Income	368	283	130%
Market Rate	1,093	733	149%
TOTAL	2,409	1,785	

Source: City of Belmont, 2024.

7.2 PROGRAM IMPLEMENTATION MATRIX

Table 7-3 includes the implementation timing for each proposed program.

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7. HOUSING GOALS, POLICIES, AND PROGRAMS

TABLE 7-3: PROGRAM IMPLEMENTATION MATRIX

Program	2024	2025	2026	2027	2028	2029	2030	2031
Program H1.1: Monitor Regional Housing Need Allocation. Monitor housing production against ABAG Fair Share Allocation in compliance with no net loss requirements during planning period. Monitor all housing unit production by all income categories.	▪ Ongoing	▪ Ongoing	▪ Ongoing	▪ Ongoing	▪ Ongoing	▪ Ongoing	▪ Ongoing	▪ Ongoing
Program H1.2: Use Public Funding for Low/Moderate Income Housing. Use City affordable housing funds to produce additional affordable housing projects and to leverage other regional, state, and federal funding sources to support the construction of affordable housing.	▪ Ongoing	▪ Ongoing	▪ Ongoing	▪ Ongoing	▪ Ongoing	▪ Ongoing	▪ Ongoing	▪ Ongoing
Program H1.3: Water and Sewer Providers. Ensure immediate delivery of the Housing Element to water and sewer providers to facilitate streamline reviews and ensure adequate capacity for housing projects.	▪ Deliver adopted Housing Element							
Program H1.4: Establish By-Right Housing Designation for Prior Housing Sites. Designate housing sites that have carried over from the prior Housing Element to allow housing development by-right consistent with State law.	▪ Completed in January							
Program H.1.5: Facilitate Pipeline and Pending Projects. The City will facilitate and support pipeline and pending projects during the planning period by working with applicants to ensure reviews are done in a timely manner, providing technical assistance, and limiting public meetings as required by SB 330. As needed, the City will provide incentives or additional assistance like expediting project review, supporting funding applications, and working to avoid unnecessary delays in processing of the applications.	▪ Ongoing	▪ Ongoing	▪ Ongoing	▪ Ongoing	▪ Ongoing	▪ Ongoing	▪ Ongoing	▪ Ongoing
Program H2.1: Support Retention of Existing Lower-Income Units. Preserve “at-risk” affordable units through monitoring and partnering, working with nonprofits, and exploring available funding sources to preserve affordability. This activity will include both units in all affordable developments with expiring deed restrictions, as well as potential BMR units that are reaching the end of the term.	▪ Ongoing review of at-risk units and tenant education	▪ Annual review of at-risk units, possible affordability extensions, acquisition opportunities, and tenant education. ▪ Q1: Draft preferences for any new affordable projects for displaced tenants in at-risk properties ▪ Q4: Recommend preference language to CC for adoption	▪ Ongoing review of at-risk units and tenant education ▪ Q1: Implement preference policy.	▪ Ongoing review of at-risk units and tenant education	▪ Ongoing review of at-risk units and tenant education	▪ Ongoing review of at-risk units and tenant education	▪ Ongoing review of at-risk units and tenant education	▪ Ongoing review of at-risk units and tenant education
Program H2.2: Manage Portfolio of Deed Restricted Affordable Units. The City will formalize its method of managing the City’s deed restricted units by identifying a service provider or developing additional staff capacity.	▪ Q3: Conduct analysis and determine whether to proceed with a service provider or staff approach.	▪ Q1: If a service provider approach is selected, launch RFP ▪ Q4: Select provider and implement program						
Program H2.3: Require Replacement Units. Adopt a policy requiring replacement units subject to the requirements of Government Code Section 65915 (c)(3) when new development occurs on a housing inventory site which currently has or within the past five years had residential uses (existing, vacated or demolished) and was legally restricted to low-income households, or subject to price control, or occupied by low-income households. Require that demolition permits include an assessment of rents to determine income status and plan to replace lost lower-income units.		▪ Q1: Conduct best practices review on replacement options that would extend past 2034 ▪ Q3: Bring recommendations to City Council ▪ Q4: implement approved policy.						

<p>Program H2.4: Rehabilitation of Existing Housing Occupied by Lower-Income Households. The City will partner with and provide financial assistance, outreach, or resources to support housing service organizations and/or non-profit organizations that help preserve existing housing that is affordable to lower-income residents by providing home repairs and energy-efficiency improvements for low-income households.</p>	<ul style="list-style-type: none"> Q4: Outreach to housing service providers 	<ul style="list-style-type: none"> Q4: Outreach to housing service providers 	<ul style="list-style-type: none"> Q4: Outreach to housing service providers 	<ul style="list-style-type: none"> Q4: Outreach to housing service providers
<p>Program H2.5: Preserve Existing Affordable Units. Develop a plan to preserve the City's affordable units that will expire in the next decade to keep them affordable long term.</p>	<ul style="list-style-type: none"> Q3: Conduct best practices research 	<ul style="list-style-type: none"> Q1: Bring recommendations to Council beginning 2026 Q2-Q3: Implement program by mid-2026. 		
<p>Program H3.1: Home Ownership Financing. Support access to home ownership opportunities and connect potential homeowners to financing sources specifically targeted to first time homebuyers or affordable housing units.</p>	<ul style="list-style-type: none"> Q3: Offer first time homebuyer workshops 	<ul style="list-style-type: none"> Q3: Offer first time homebuyer workshops 	<ul style="list-style-type: none"> Q3: Offer first time homebuyer workshops 	<ul style="list-style-type: none"> Q3: Offer first time homebuyer workshops
<p>Program H3.2: Continue to Participate in Countywide Below Market Rate Unit Web Portal. San Mateo County and multiple other jurisdictions collaborate on a web portal that includes affordable housing units available for rent, online applications, and access to the waitlist for future units.</p>	<ul style="list-style-type: none"> Ongoing 	<ul style="list-style-type: none"> Ongoing 	<ul style="list-style-type: none"> Ongoing 	<ul style="list-style-type: none"> Ongoing
<p>Program H4.1: Update Zoning Code to Increase Floor Area Ratios and Density. Modify the Zoning Ordinance to allow for increased floor area ratios and density to better facilitate development projects.</p>	<ul style="list-style-type: none"> Completed in January 			
<p>Program H4.2: Zoning Code Amendments to Remove Constraints. The City will annually review, and amend as necessary, the Zoning Code to ensure consistency with State Housing Government Code requirements and remove or lessen constraints on new housing development.</p>	<ul style="list-style-type: none"> Q4: Amend Zoning Code Review State Density Board law and update Zoning Code w/in 6 months of review, as needed 	<ul style="list-style-type: none"> Review State Density Board law and update Zoning Code w/in 6 months of review, as needed 	<ul style="list-style-type: none"> Review State Density Board law and update Zoning Code w/in 6 months of review, as needed 	<ul style="list-style-type: none"> Review State Density Board law and update Zoning Code w/in 6 months of review, as needed
<p>Program H4.3: Lot Consolidation Fee Waivers. Waive the permit fees for subdivisions actions to consolidate lots for housing development projects with at least 20% very low- and/or extremely low-income units.</p>		<ul style="list-style-type: none"> Q3: City Council review draft policy Q4: Adopt policy 		
<p>Program H4.4: Reduce Parking Requirements. Reduce parking requirements in certain residential zoning districts.</p>		<ul style="list-style-type: none"> Q1: Develop code amendments to reduce parking requirements in the R-2, R-3 and R-4 zoning districts to be consistent with other multi-family zoning districts Q4: Bring recommended changes to PC 	<ul style="list-style-type: none"> Q1: Bring recommended changes to CC for approval Q2: Implement 	
<p>Program H4.5: Evaluation of Zoning Constraints. While the City's development standards have proven to not be a constraint to housing development in recent years, it is important to continue to evaluate their effectiveness during the planning period. The City will monitor and analyze the interrelationship between the zoning standards, objective design standards, and State Density Bonus to identify and remove constraints to housing development. In addition, the City will conduct a peer agencies evaluation of zoning standards such as height and open space requirements as part of the analysis.</p>	<ul style="list-style-type: none"> Ongoing: Monitor use of density bonus and feasibility of Objective Design Standards 	<ul style="list-style-type: none"> Ongoing: Monitor use of density bonus and feasibility of Objective Design Standards 	<ul style="list-style-type: none"> Ongoing: Monitor use of density bonus and feasibility of Objective Design Standards Q4: Peer agency and developer zoning standards evaluation completed 	<ul style="list-style-type: none"> Ongoing: Monitor use of density bonus and feasibility of Objective Design Standards Q2: Adopt zoning amendments, if needed to remove constraints
<p>Program H4.6: Update the City's Webpage to Provide Enhanced Information for Housing Developers. Provide a clear summary of procedures, development standards, and fees for housing development on the Community Development webpage.</p>	<ul style="list-style-type: none"> Q2: Update the City's website 	<ul style="list-style-type: none"> Q2: Update the City's website 	<ul style="list-style-type: none"> Q2: Update the City's website 	<ul style="list-style-type: none"> Q2: Update the City's website

7. HOUSING GOALS, POLICIES, AND PROGRAMS

<p>Program H4.7: Monitor Commercial Development in Mixed-Use Districts. The City will continue monitoring commercial development in mixed-use districts and if the City find that the trends are shifting or incentivizing 100% commercial, the City will review and take action as necessary.</p>	<ul style="list-style-type: none"> Q4: Analyze development trends 	<ul style="list-style-type: none"> Q4: Analyze development trends 	<ul style="list-style-type: none"> Q4: Analyze development trends 	<ul style="list-style-type: none"> Q4: Analyze development trends 	<ul style="list-style-type: none"> Q4: Analyze development trends 	<ul style="list-style-type: none"> Q4: Analyze development trends 	<ul style="list-style-type: none"> Q4: Analyze development trends 	<ul style="list-style-type: none"> Q4: Analyze development trends 	
<p>Program H5.1: Update Website to Improve Access to Fair Housing Information and Housing Services. Increase community outreach and availability of fair housing resources and other housing services in multiple languages through the City’s Housing webpage. Advertise two existing HIP Housing programs with a track record of assisting Belmont residents and workers: 1) The <i>Self Sufficiency Program</i> provides subsidized rent and support services to low-income parents or emancipated foster youth who are in school to increase their earning power and become financially self-sufficient within 1-5 years; and 2) The <i>Housing Readiness Program</i> supports people who contact HIP to help them become more “housing ready” including housing resources, assistance completing housing applications, and offering activities that help prepare people to access housing.</p>		<ul style="list-style-type: none"> Q1: Complete best practices review Q2: Complete website update, update quarterly thereafter 	<ul style="list-style-type: none"> Update website quarterly 	<ul style="list-style-type: none"> Update website quarterly 	<ul style="list-style-type: none"> Update website quarterly 	<ul style="list-style-type: none"> Update website quarterly 	<ul style="list-style-type: none"> Update website quarterly 	<ul style="list-style-type: none"> Update website quarterly 	
<p>Program H5.2: Coordinate with other jurisdictions and agencies in the County to advance AFFH goals. San Mateo County has a proven track record of collaboration between jurisdictions. As cities move towards more active efforts to further fair housing, there are new opportunities to collaborate.</p>	<ul style="list-style-type: none"> Ongoing 	<ul style="list-style-type: none"> Ongoing 	<ul style="list-style-type: none"> Ongoing 	<ul style="list-style-type: none"> Ongoing 	<ul style="list-style-type: none"> Ongoing 	<ul style="list-style-type: none"> Ongoing 	<ul style="list-style-type: none"> Ongoing 	<ul style="list-style-type: none"> Ongoing 	
<p>Program H5.3: Modify the Inclusionary Housing Program. Adjust the City's Below Market Rate (Inclusionary) Program to provide pathways for the construction of affordable units that address the needs of residents with extremely low and very low incomes who face very high rates of cost burden in the city.</p>		<ul style="list-style-type: none"> Q4: Complete feasibility analysis 	<ul style="list-style-type: none"> Q1: Adopt redesigned program 						
<p>Program H5.4: Work with Housing Developers to Affirmatively Market Housing to Households with Disproportionate Housing Needs. The City actively supports collaboration between the private sector and service providers to connect persons in need of housing with new housing opportunities. Special attention will be paid to Black and Hispanic households that are more cost burdened and persons with disabilities.</p>	<ul style="list-style-type: none"> Q4: Establish list of service providers Review developer marketing plans to ensure affirmative marketing is included 	<ul style="list-style-type: none"> Q4: Review list of service providers Review developer marketing plans to ensure affirmative marketing is included 	<ul style="list-style-type: none"> Q4: Review list of service providers Review developer marketing plans to ensure affirmative marketing is included 	<ul style="list-style-type: none"> Q4: Review list of service providers Review developer marketing plans to ensure affirmative marketing is included 	<ul style="list-style-type: none"> Q4: Review list of service providers Review developer marketing plans to ensure affirmative marketing is included 	<ul style="list-style-type: none"> Q4: Review list of service providers Review developer marketing plans to ensure affirmative marketing is included 	<ul style="list-style-type: none"> Q4: Review list of service providers Review developer marketing plans to ensure affirmative marketing is included 	<ul style="list-style-type: none"> Q4: Review list of service providers Review developer marketing plans to ensure affirmative marketing is included 	
<p>Program H5.5: Provide Fair Housing Training for Landlords and Tenants. Partner with Project Sentinel to provide training with a focus on tenant’s rights, race-based discrimination, and reasonable accommodations.</p>		<ul style="list-style-type: none"> Provide training Q3: Provide a City Council Study Session on tenant’s rights and available resources. 	<ul style="list-style-type: none"> Provide training 		<ul style="list-style-type: none"> Provide training 	<ul style="list-style-type: none"> Provide training 		<ul style="list-style-type: none"> Provide training 	
<p>Program H5.6: Expand Tenant Protections. The City will extend tenant protections to address displacement and relocation costs.</p>		<ul style="list-style-type: none"> Q4: Draft extended tenant protections provisions and research policy provisions for substantial remodel exemptions and right of return policies Conduct proactive outreach to tenants and tenant groups 	<ul style="list-style-type: none"> Q1: Bring recommended tenant protection language to City Council 	<ul style="list-style-type: none"> Conduct proactive outreach to tenants and tenant groups 		<ul style="list-style-type: none"> Conduct proactive outreach to tenants and tenant groups 		<ul style="list-style-type: none"> Conduct proactive outreach to tenants and tenant groups bi-annually 	
<p>Program H5.7: Continue Financial Support of Existing Home Sharing Program. The City will continue to provide financial support for the HIP Housing <i>Home Sharing Program</i> that matches individuals seeking housing with people who have a room or ADU to rent.</p>	<ul style="list-style-type: none"> Ongoing 	<ul style="list-style-type: none"> Ongoing 	<ul style="list-style-type: none"> Ongoing 	<ul style="list-style-type: none"> Ongoing 	<ul style="list-style-type: none"> Ongoing 	<ul style="list-style-type: none"> Ongoing 	<ul style="list-style-type: none"> Ongoing 	<ul style="list-style-type: none"> Ongoing 	
<p>Program H5.8: Facilitate Development of Housing on Institutional Properties. Conduct direct outreach and provide technical assistance to religious institutions and private schools to encourage development of housing on their sites.</p>		<ul style="list-style-type: none"> Conduct annual outreach to religious/institution site owners or operators 	<ul style="list-style-type: none"> Conduct annual outreach to religious/institution site owners or operators 	<ul style="list-style-type: none"> Conduct annual outreach to religious/institution site owners or operators 	<ul style="list-style-type: none"> Conduct annual outreach to religious/institution site owners or operators 	<ul style="list-style-type: none"> Conduct annual outreach to religious/institution site owners or operators 	<ul style="list-style-type: none"> Conduct annual outreach to religious/institution site owners or operators 	<ul style="list-style-type: none"> Conduct annual outreach to religious/institution site owners or operators 	

<p>Program H5.9: Amend Zoning Code to Facilitate Production of ADUs and SB9 units. Adopt zoning code amendments to facilitate production of additional ADUs and SB9 units in single-family neighborhoods.</p>		<ul style="list-style-type: none"> Complete zoning ordinance amendments and establish policies and procedures to facilitate these types of projects 							
<p>Program H5.10: Provide Financial Support for ADUs that Serve Lower-Income Households. Establish a grant or loan program to support low-income homeowners to construct ADUs or incentivize homeowners to construct ADUs affordable to lower income households.</p>	<ul style="list-style-type: none"> Participate in Countywide process 	<ul style="list-style-type: none"> Q4: Establish a grant or loan program 							
<p>Program H5.11: Conduct Outreach to Encourage ADU and SB9 Unit Production. Strengthen ADU and SB9 outreach programs to encourage a range of unit sizes, with a demographic range of occupants, that are geographically dispersed throughout the city.</p>	<ul style="list-style-type: none"> Q3: Join ADU Resource Center and launch online plans gallery 	<ul style="list-style-type: none"> Q1: Create new outreach materials Q2: Conduct analysis and outreach related to units on sloped sites Conduct outreach to all ADU/JADU/SB9 owners 	<ul style="list-style-type: none"> Conduct outreach to all ADU/JADU/SB9 owners 	<ul style="list-style-type: none"> Conduct outreach to all ADU/JADU/SB9 owners 	<ul style="list-style-type: none"> Conduct outreach to all ADU/JADU/SB9 owners 	<ul style="list-style-type: none"> Conduct outreach to all ADU/JADU/SB9 owners 	<ul style="list-style-type: none"> Conduct outreach to all ADU/JADU/SB9 owners 	<ul style="list-style-type: none"> Conduct outreach to all ADU/JADU/SB9 owners 	<ul style="list-style-type: none"> Conduct outreach to all ADU/JADU/SB9 owners
<p>Program H5.12: Create an AFFH Monitoring Program. Create an AFFH Monitoring Program to encourage units with a demographic range of occupants that are geographically dispersed throughout the city.</p>		<ul style="list-style-type: none"> Q1: Create a list and map of existing ADUs, JADUs and SB9 units Participate in regional process to establish an ADU monitoring program 		<ul style="list-style-type: none"> If ADU production does not meet target, consider additional strategies 					

APPENDIX A: NEEDS ANALYSIS

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I. INTRODUCTION

The Bay Area continues to see growth in both population and jobs, which means more housing of various types and sizes is needed to ensure that residents across all income levels, ages, and abilities have a place to call home. While the number of people drawn to the region over the past 30 years has steadily increased, housing production has stalled, contributing to the housing shortage that communities are experiencing today. In many cities, this has resulted in residents being priced out, increased traffic congestion caused by longer commutes, and fewer people across incomes being able to purchase homes or meet surging rents.

The 2023-2031 Housing Element update provides a roadmap for how to meet local growth and housing challenges. Required by the state, the Housing Element identifies existing housing conditions and community, reiterates housing goals, and creates a plan for housing creation. The Housing Element is an integral part of the General Plan, which guides the policies of the City of Belmont.

2. KEY STATISTICS

- **Population** – Generally, the population of the Bay Area continues to grow due to natural growth as well as a strong economy that draws new residents to the region. The population of Belmont increased by 6.7% from 2000 to 2020, which is below the growth rate of the Bay Area as a whole.
- **Age** – In 2019, Belmont’s youth population under the age of 18 was 6,233 and its senior population 65 and older was 4,538. These age groups represent 23.0% and 16.7%, respectively, of Belmont’s population.
- **Race/Ethnicity** – In 2020, 53.9% of Belmont’s population was White, 1.0% was African American, 28.3% was Asian, and 12.1% was Latinx. People of color in Belmont comprise a proportion below the proportion in the Bay Area as a whole.¹
- **Employment** – Belmont residents most commonly work in the *Financial & Professional Services* industry. From January 2010 to January 2021, the unemployment rate in Belmont decreased by 3.0%. Since 2010, the number of jobs located in the jurisdiction increased by 560 (9.5%). Additionally, the jobs-household ratio in Belmont decreased from 0.75 in 2002 to 0.62 in 2018.
- **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. From 2010 to 2020, the number of homes in Belmont increased by 0.6%, which is below the growth rate for San Mateo County and below the growth rate of the region’s housing stock at this time.
- **Home Prices** – A diversity of homes at all income levels creates opportunities for all Belmont residents to live and thrive in the community.
 - **Ownership** – The largest proportion of homes had a value in the range of \$1M to \$2M in 2019. Home prices increased by 123.6% from 2010 to 2020.
 - **Rental Prices** – In 2019, the typical contract rent for an apartment in Belmont was \$2,250. From 2009 to 2019, rental prices increased by 76.8%. To rent a typical apartment without cost burden, a household would need to make \$90,040 per year.²
- **Housing Type** – It is important to have a variety of housing types to meet the current and future needs of the community. In 2020, 58.0% of Belmont homes were single-family

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.

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

- detached, 6.0% were single-family attached, 3.1% were small multi-family (2-4 units), and 32.9% were medium or large multi-family (5+ units). From 2010 to 2020, the number of single-family units increased more than the number of multi-family units. Generally, the share of the housing stock that is detached single-family homes is above that of other jurisdictions in the region.
- **Cost Burden** – The U.S. Department of Housing and Urban Development considers housing to be affordable for a household if the household spends less than 30% of its income on housing costs. A household is considered “cost-burdened” if it spends more than 30% of its monthly income on housing costs, while those who spend more than 50% of their income on housing costs are considered “severely cost-burdened.” In Belmont, 18.1% of households are cost-burdened, while 15.0% are severely cost-burdened.
 - **Displacement/Gentrification** – According to research from The University of California, Berkeley, no households in Belmont live in neighborhoods that are susceptible to or experiencing displacement, and none live in areas at risk of or undergoing gentrification. In Belmont, 45.5% of households 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 is built at all income levels.
 - **Neighborhood** – In Belmont, 100.0% of residents live in neighborhoods identified as “highest resource” or “high resource” by State-commissioned research. By comparison, 0.0% of residents live in areas identified by this research as “low resource” or “high segregation and poverty.” These neighborhood designations are based on a range of indicators 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 Belmont, 9.0% of residents have a disability of any kind and may require accessible housing. Additionally, 5.2% of Belmont households are larger households with five or more people, likely needing larger housing units with three bedrooms or more, while 6.7% of households are female-headed families, which are often at a greater risk of housing insecurity.

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.

NOTE ON DATA

Many of the tables in this report are sourced from data from the Census Bureau’s American Community Survey or U.S. Department of Housing and Urban Development’s Comprehensive Housing Affordability Strategy (CHAS) data, both of which are samples and as such, are subject to sampling variability. This means that data is an estimate, and that other estimates could be possible if another set of respondents had been reached. We use the five-year release to get a larger data pool to minimize this “margin of error” but particularly for the smaller cities, the data will be based on fewer responses, and the information should be interpreted accordingly.

NOTE ON FIGURES

Any figure that does not specify geography in the figure name represents data for Belmont.

3. LOOKING TO THE FUTURE: REGIONAL HOUSING NEEDS

3.1 REGIONAL HOUSING NEEDS DETERMINATION

The Plan Bay Area 2050⁴ Final Blueprint forecasts that the nine-county San Francisco 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, the Department of Housing and Community Development (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.

Every year, the US Department of Housing and Urban Development, in conjunction with the State of California, establish income categories based on the median income in each county. Based on new requirements for the completion of the Housing Element, jurisdictions must now report on the following income categories.

- Extremely Low-Income: 0-30% of Area Median Income, or AMI
- Very Low-Income: 30-50% AMI
- Low-Income: 50-80% AMI
- Moderate-Income: 80-120% AMI
- Above Moderate-Income: 120%+ AMI

Table 1 illustrates the income categories for San Mateo County in 2022. The median income for a family of four is \$166,000.

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 needs. The adjustments result from recent legislation requiring HCD to apply additional adjustment factors to the baseline growth projection from 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 share of cost-burdened households, seeking to bring the region more in line with comparable ones.⁵ These new laws governing the methodology for how HCD calculates the RHND resulted in a significantly higher number of housing units for which the Bay Area must plan compared to previous RHNA cycles.

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 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](https://www.hcd.ca.gov/community-development/housing-element/docs/abagrhna-final060920(r).pdf)

TABLE 1: INCOME LIMITS FOR SAN MATEO COUNTY (2022)

Number of Persons in Household		1	2	3	4	5	6	7	8
San Mateo County Area Median Income: \$166,000	Acutely Low-Income	\$17,450	\$19,900	\$22,400	\$24,900	\$26,900	\$28,900	\$30,900	\$32,850
	Extremely Low-Income	\$39,150	\$44,750	\$50,350	\$55,900	\$60,400	\$64,850	\$69,350	\$73,800
	Very Low-Income	\$65,250	\$74,600	\$83,900	\$93,200	\$100,700	\$108,150	\$115,600	\$123,050
	Low-Income	\$104,400	\$119,300	\$134,200	\$149,100	\$161,050	\$173,000	\$184,900	\$196,850
	Median Income	\$116,200	\$132,800	\$149,400	166,000	\$179,300	\$192,550	\$205,850	\$219,100
	Moderate-Income	\$139,450	\$159,350	\$179,300	\$199,200	\$215,150	\$231,050	\$247,000	\$262,950

Source: State of California Department of Housing and Community Development, May 13, 2022, <https://www.hcd.ca.gov/grants-funding/income-limits/state-and-federal-income-limits.shtml>.

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), which is also the share of the RHND assigned to each jurisdiction by the Association of Bay Area Governments (ABAG). State Housing Element Law requires that ABAG develop a methodology calculating the number of housing units assigned to each city and county and distribute 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 Bay Area jurisdictions received a larger RHNA this cycle compared to the prior cycle, primarily due to changes in state law that led to a considerably higher RHND compared to previous cycles.

In January 2022, HCD approved ABAG’s RHNA Methodology. For Belmont, the RHNA to be planned for this cycle is 1,785 units, a slated increase from the last cycle. The allocation Belmont received from the RHNA Methodology is broken down by income category as follows, including an estimate of the number of extremely low-income units needed.

TABLE 2: ILLUSTRATIVE REGIONAL HOUSING NEEDS ALLOCATION FROM DRAFT METHODOLOGY

Income Group	San Mateo			San Mateo		
	Belmont Units	County Units	Bay Area Units	Belmont Percent	County Percent	Bay Area Percent
Very Low-Income (<50% of AMI)	488	12,196	114,442	27.3%	25.6%	25.9%
<i>Estimated Extremely Low-Income (0-30% of AMI)</i>	241	N/A	N/A	13.5%	N/A	N/A
Low-Income (50%-80% of AMI)	281	7,023	65,892	15.7%	14.7%	14.9%
Moderate-Income (80%-120% of AMI)	283	7,937	72,712	15.9%	16.6%	16.5%
Above Moderate-Income (>120% of AMI)	733	20,531	188,130	41.1%	43.1%	42.6%
Total	1,785	47,687	441,176	100.0%	100.0%	100.0%



4. POPULATION, EMPLOYMENT AND HOUSEHOLD CHARACTERISTICS

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, apart from 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, Belmont’s population has increased by 6.7%, while the region as a whole has experienced an increase of 14.8%. Approximately 13.5% of Belmont’s population moved during 2020, a number 0.1% greater than the regional rate of 13.4%.

TABLE 3: POPULATION GROWTH TRENDS

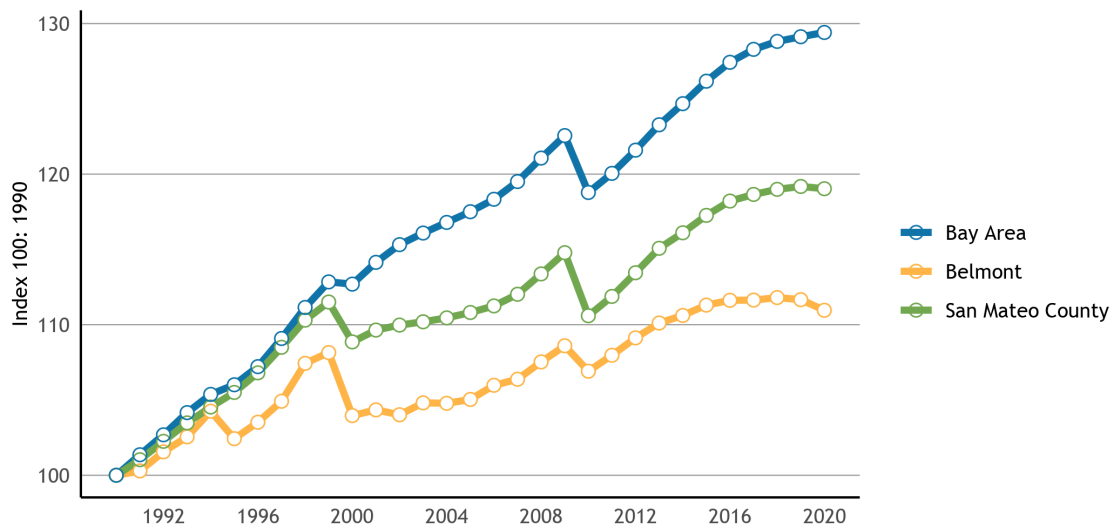
Geography	1990	1995	2000	2005	2010	2015	2020
Belmont	24,165	24,752	25,123	25,382	25,835	26,896	26,813
San Mateo County	649,623	685,354	707,163	719,844	718,451	761,748	773,244
Bay Area	6,020,147	6,381,961	6,784,348	7,073,912	7,150,739	7,595,694	7,790,537

Universe: Total population.

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

For more years of data, please refer to the Data Packet Workbook, Table POPEMP-01.

Figure 1: Population Growth Trends



Source: California Department of Finance, E-5 series Note: The data shown on the graph represents 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. DOF uses the decennial census to benchmark subsequent population estimates. For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-01.

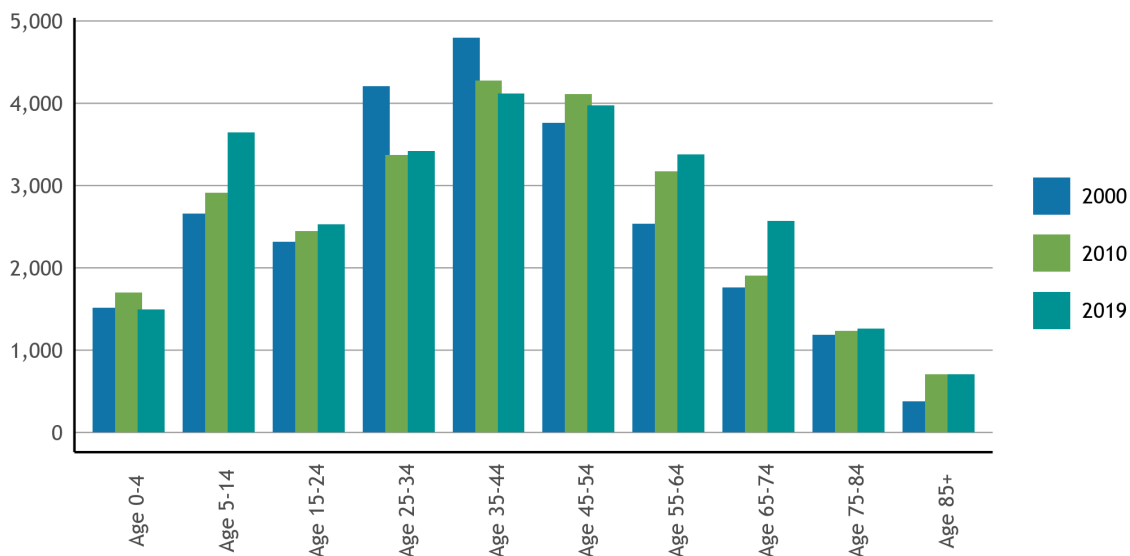
In 2020, the population of Belmont was estimated at 26,813, or 3.5% of San Mateo County’s population. From 1990 to 2000, the City’s population increased by 4.0%; from 2000 to 2010, it increased by 2.8%; and from 2010 to 2020, it increased by 3.8%.

4.2 AGE

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

In Belmont, the median age in 2000 was 38.5. By 2019, this figure increased to approximately 40 years old. More specifically, the population of those under 14 and those 65-and-over has increased since 2010 (see Figure 2).

Figure 2: Population by Age (2000-2019)



Universe: Total population.

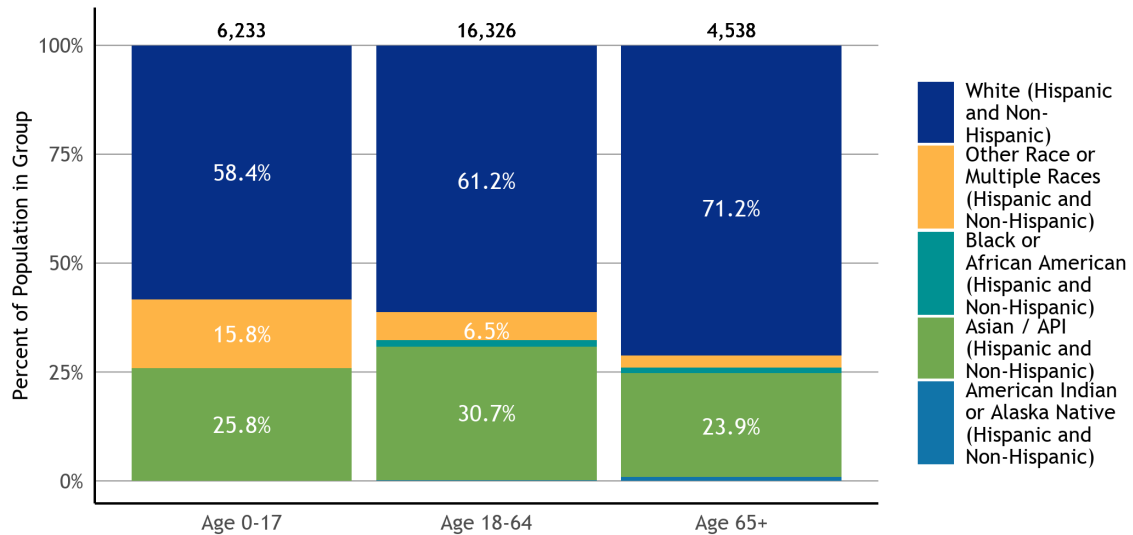
Source: U.S. Census Bureau, Census 2000 SF1, Table P12; U.S. Census Bureau, Census 2010 SF1, Table P12; U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B01001

For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-04.

Looking at the youth and senior populations by race can add an additional layer of understanding, as families and seniors of color are even more likely to experience challenges

finding affordable housing. In Belmont, people of color⁶ constitute 41.6% of youth under 18 and 28.8% of seniors (see Figure 3).

Figure 3: Senior and Youth Population by Race



Universe: Total population.

Notes: In the sources for this table, the Census Bureau does not disaggregate racial groups by Hispanic/Latinx ethnicity, and an overlapping category of Hispanic / non-Hispanic groups has not been shown to avoid double counting in the stacked bar chart.

Source: U.S. Census Bureau, American Community Survey 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.

4.3 RACE AND ETHNICITY

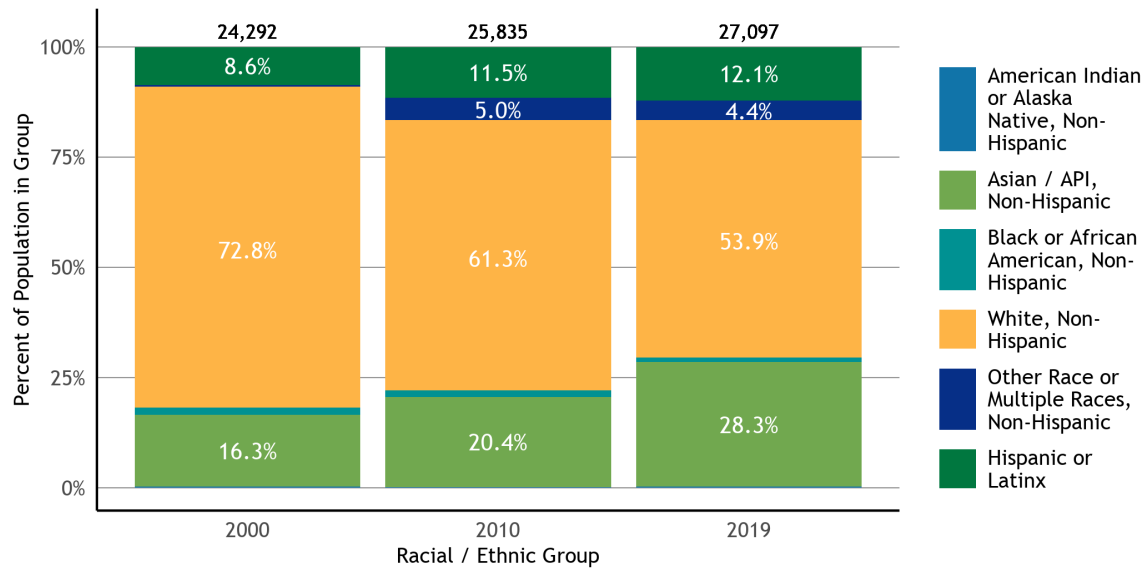
Understanding the racial makeup of a city and region is important for designing and implementing effective housing policies and programs. These patterns are shaped by both market factors and government actions, such as exclusionary zoning, discriminatory lending practices, and displacement that have occurred over time and continue to impact communities of color today.⁷

Since 2000, the percentage of residents in Belmont identifying as White has decreased—and by the same token, the percentage of residents of all other races and ethnicities has increased—by 18.9%, with the 2019 population standing at 14,611 (see Figure 4). During this period, the *Asian/API, Non-Hispanic* population increased the most while the *White, Non-Hispanic* population decreased the most.

⁶ Here, we count all non-white racial groups.

⁷ 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 4 Population by Race (2000-2019)



Universe: Total population.

Notes: Data for 2019 represents 2015-2019 ACS estimates. The Census Bureau defines Hispanic/Latinx ethnicity separate from racial categories. For the purposes of this graph, the "Hispanic or Latinx" racial/ethnic group represents those who identify as having Hispanic/Latinx ethnicity and may also be members of any racial group. All other racial categories on this graph represent those who identify with that racial category and do not identify with Hispanic/Latinx ethnicity.

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

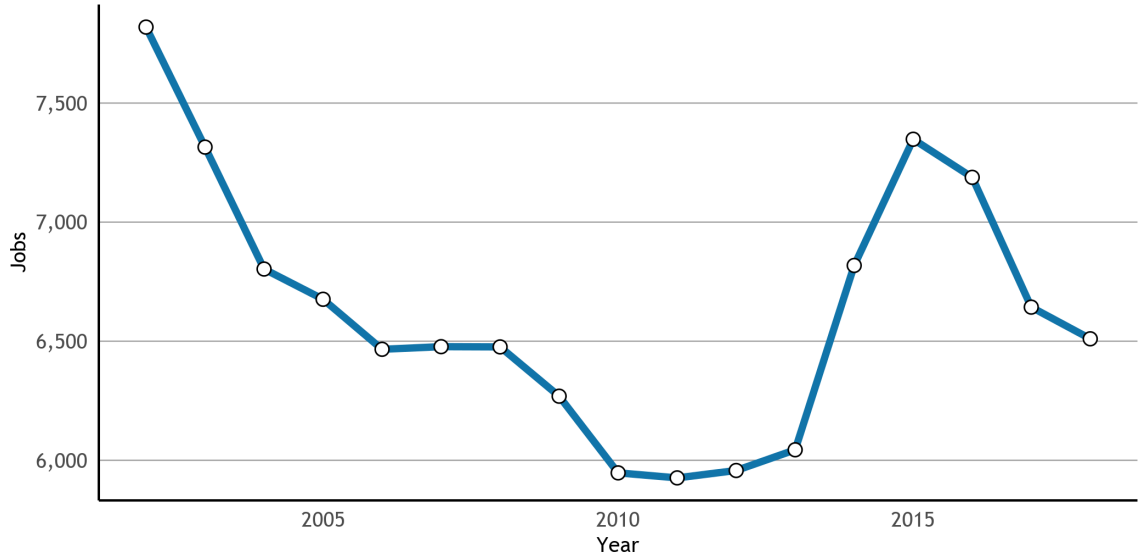
For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-02.

4.4 EMPLOYMENT TRENDS

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 have more employed residents than jobs 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 the 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 out of sync at a sub-regional scale. One measure of this is the relationship between workers and jobs. From 2002 to 2018, the number of jobs in Belmont decreased by 16.7% (see Figure 5).

Figure 5: Jobs in Belmont (2002-2018)

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

Notes: The data is tabulated by place of work, regardless of where a worker lives. The source data is provided at the census block level. These are crosswalked to jurisdictions and summarized.

Source: U.S. Census Bureau, Longitudinal Employer-Household Dynamics, Workplace Area Characteristics (WAC) files, 2002-2018
For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-11.

From 2002-2018, the largest-growing job sectors were *Information* (100%), followed by *Health and Educational Services* (32%), *Government* (31%), and *Professional and Managerial Services* (22%). By contrast, *Transportation and Utilities* (-34%), and *Retail* (-28%) saw substantial decreases during this period. In Belmont, there are 13,688 employed residents and 7,867 jobs⁸ and the ratio of jobs to resident workers is 0.57; therefore, Belmont is a net exporter of workers.

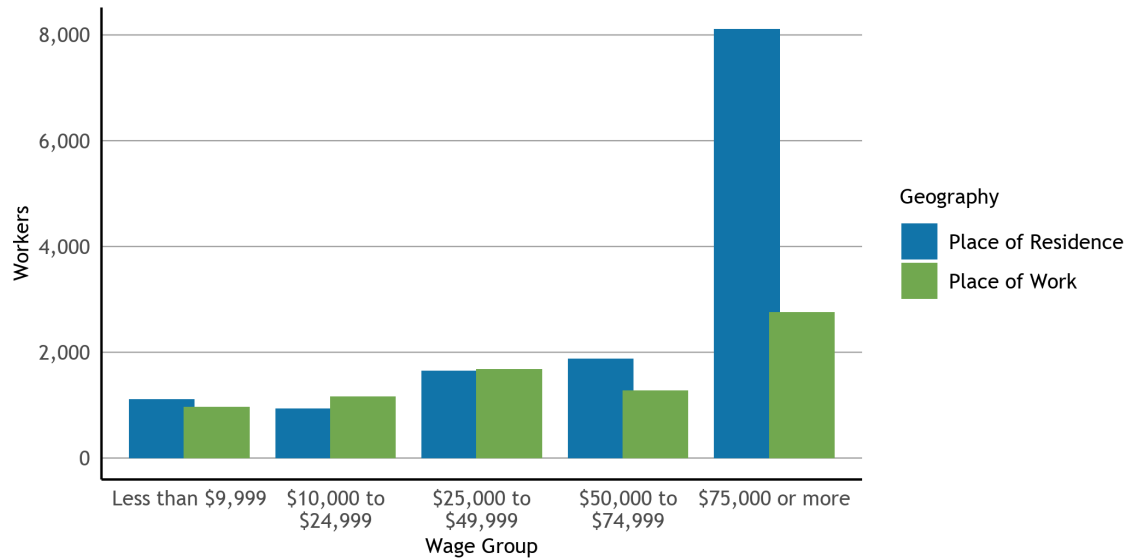
Figure 6 shows the balance when comparing jobs to workers, broken down by wage group and offering additional insights into local dynamics. A community may offer employment for relatively low-income workers but have relatively few housing options for those workers, or conversely, it may house residents 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 each wage group suggests the need to import those workers while surpluses of workers in a wage group means the community will export workers to other jurisdictions. Such flows are not inherently bad, but over time, sub-regional imbalances may result. Belmont has more low-wage jobs (paying less than \$25,000) than low-

⁸ 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.

wage residents. The city also has more high-wage residents than high-wage jobs (paying more than \$75,000) (see Figure 6).⁹

Figure 6: Workers by Earnings and Jurisdiction as Place of Work and Place of Residence



Universe: Workers 16 years and over with earnings.

Source: U.S. Census Bureau, American Community Survey 5-Year Data 2015-2019, B08119, B08519
 For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-10.

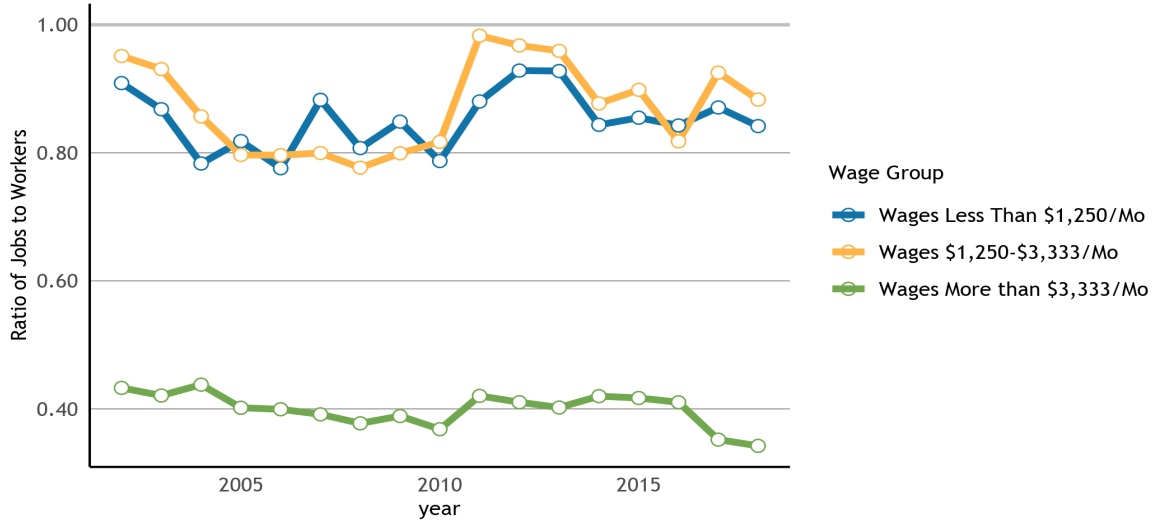
Figure 7 shows the balance of a jurisdiction’s resident workers to the jobs located there for different wage groups as a ratio instead. A value of 1 means that a city has the same number of jobs as residents in a given wage group. Values above 1 indicate a jurisdiction will need to import workers. At the regional scale, the ratio is 1.04 jobs for each worker, implying a modest import of workers from outside the region (see Figure 7).

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 means many workers endure long commutes; it also contributes to traffic congestion and time lost for all road users.

When there are more jobs than employed residents, it means a city is relatively jobs-rich, typically also with a high jobs to household ratio. Thus, bringing housing into the measure, the *jobs to household ratio* in Belmont has decreased from 0.75 in 2002 to 0.62 in 2018 (see Figure 8).

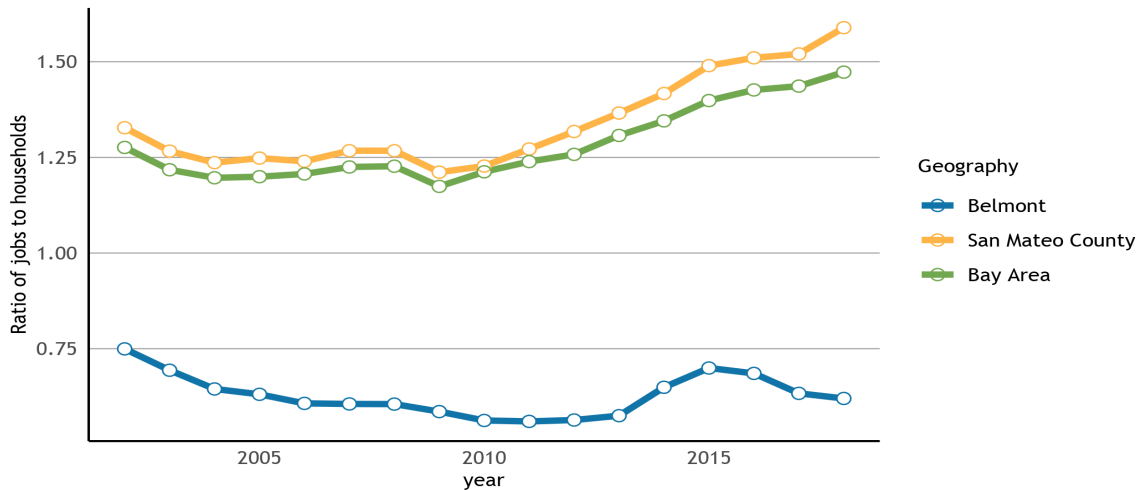
⁹ The source table is top-coded at \$75,000, precluding more fine grained analysis at the higher end of the wage spectrum.

Figure 7: Jobs-Worker Ratios by Wage Group



Universe: Jobs in a jurisdiction from unemployment insurance-covered employment (private, state and local government) plus United States Office of Personnel Management-sourced Federal employment.
Notes: The ratio compares job counts by wage group from two tabulations of LEHD data: Counts by place of work relative to counts by place of residence. See text for details.
Source: U.S. Census Bureau, Longitudinal Employer-Household Dynamics, Workplace Area Characteristics (WAC) files (Jobs); Residence Area Characteristics (RAC) files (Employed Residents), 2010-2018. For the data table behind this figure, please refer to the Workbook, Table PO PEMP-14.

Figure 8: Jobs-Household Ratio

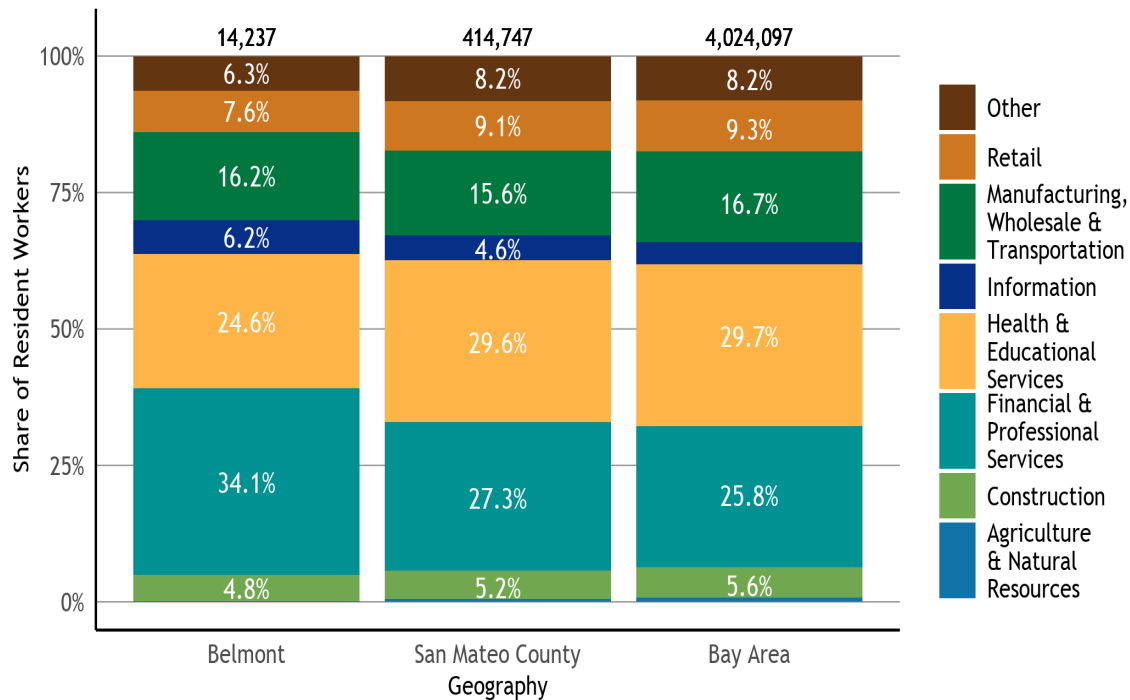


Universe: Jobs in a jurisdiction from unemployment insurance-covered employment (private, state and local government) plus United States Office of Personnel Management-sourced Federal employment; households in a jurisdiction.
Notes: The data is tabulated by place of work, regardless of where a worker lives. The source data is provided at the census block level. These are crosswalked to jurisdictions and summarized. The ratio compares place of work wage and salary jobs with households, or occupied housing units. A similar measure is the ratio of jobs to housing units. However, this jobs-household ratio serves to compare the number of jobs in a jurisdiction to the number of housing units that are actually occupied. The difference between a jurisdiction's jobs-housing ratio and jobs-household ratio will be most pronounced in jurisdictions with high vacancy rates, a high rate of units used for seasonal use, or a high rate of units used as short-term rentals.
Source: U.S. Census Bureau, Longitudinal Employer-Household Dynamics, Workplace Area Characteristics (WAC) files (Jobs), 2002-2018; California Department of Finance, E-5 (Households).
For the data table behind this figure, please refer to the Data Packet Workbook, Table PO PEMP-13.

SECTOR COMPOSITION

In terms of sectoral composition, the largest industry in which Belmont residents work is *Financial & Professional Services*, while the *Health & Educational Services* industry employs the most San Mateo County and Bay Area residents (see Figure 9).

Figure 9: Resident Employment by Industry



Universe: Civilian employed population age 16 years and over.

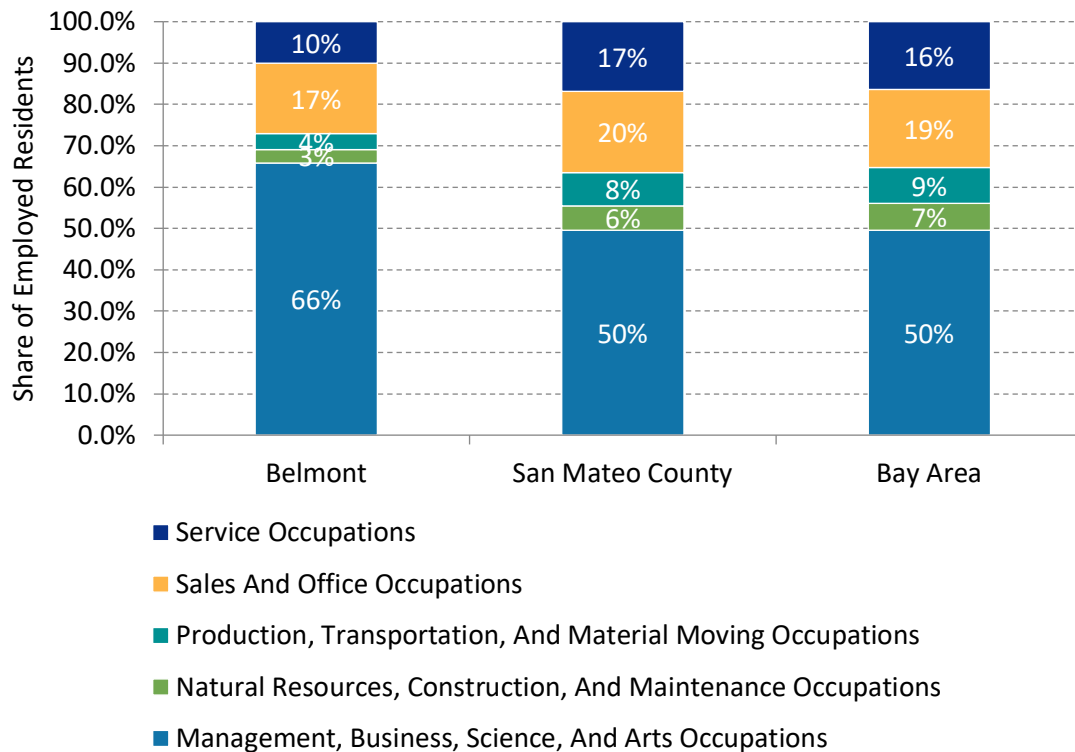
Notes: The data displayed shows the industries in which jurisdiction residents work, regardless of the location where those residents are employed (whether within the jurisdiction or not). Categories are derived from the following source tables: Agriculture & Natural Resources: C24030_003E, C24030_030E; Construction: C24030_006E, C24030_033E; Manufacturing, Wholesale & Transportation: C24030_007E, C24030_034E, C24030_008E, C24030_035E, C24030_010E, C24030_037E; Retail: C24030_009E, C24030_036E; Information: C24030_013E, C24030_040E; Financial & Professional Services: C24030_014E, C24030_041E, C24030_017E, C24030_044E; Health & Educational Services: C24030_021E, C24030_024E, C24030_048E, C24030_051E; Other: C24030_027E, C24030_054E, C24030_028E, C24030_055E.

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table C24030.

For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-06.

Looked at a different way, *Management, Business, Science, and Arts* occupations constitute approximately 66% of Belmont residents' employment, which is substantially higher than both San Mateo County and the Bay Area as a whole.

Figure 10: Resident Employment by Occupation



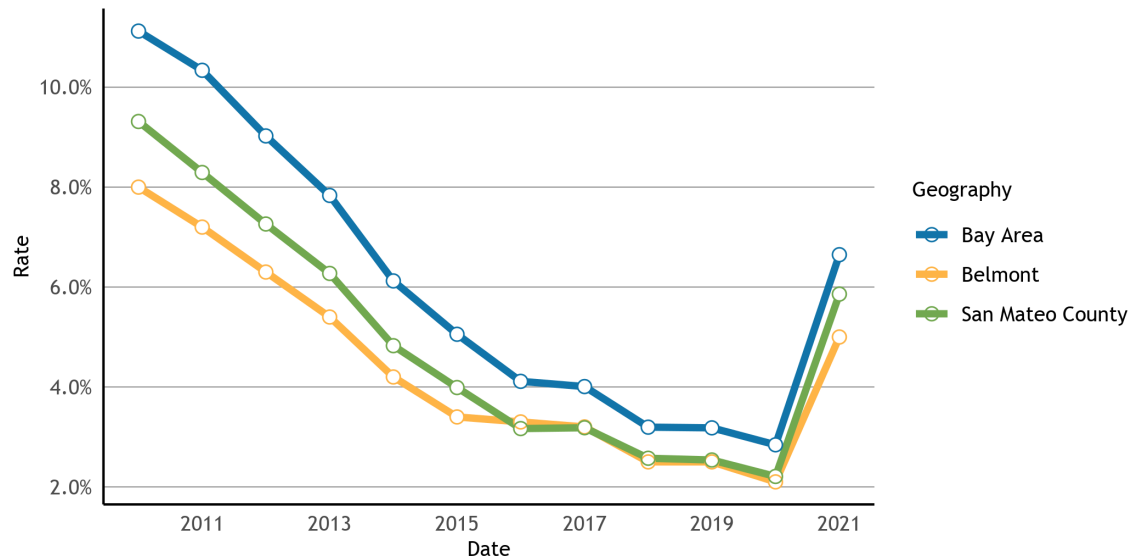
Universe: Civilian employed population age 16 years and over.
Notes: The data displayed shows the occupations of jurisdiction residents, regardless of the location where those residents are employed (whether within the jurisdiction or not).
Categories are derived from the following source tables: management, business, science, and arts occupations: C24010_003E, C24010_039E; service occupations: C24010_019E, C24010_055E; sales and office occupations: C24010_027E, C24010_063E; natural resources, construction, and maintenance occupations: C24010_030E, C24010_066E; production, transportation, and material moving occupations: C24010_034E, C24010_070E.
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table C24010.
For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-07.

UNEMPLOYMENT

In Belmont, there was a 3.0% decrease in the unemployment rate between January 2010 and January 2021. Jurisdictions throughout the region experienced a sharp rise in unemployment in 2020 due to the impacts of the COVID-19 pandemic, though there was a general improvement and recovery in the later months of 2020.

As of May 2021, the State Employment Development Department estimated Belmont’s unemployment rate at 3.8%. By contrast, the rate for all of San Mateo County was estimated at 4.8%.

Figure 11: Unemployment Rate



Universe: Civilian noninstitutional population ages 16 and older.
 Notes: Unemployment rates for the jurisdiction level is derived from larger-geography estimates. This method assumes that the rates of change in employment and unemployment are exactly the same in each sub-county area as at the county level. If this assumption is not true for a specific sub-county area, then the estimates for that area may not be representative of the current economic conditions. Since this assumption is untested, caution should be employed when using these data. Only not seasonally-adjusted labor force (unemployment rates) data are developed for cities and CDPs.
 Source: California Employment Development Department, Local Area Unemployment Statistics (LAUS), Sub-county areas monthly updates, 2010-2021. For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-15.

4.5 2018-2028 OCCUPATION PROJECTIONS

The State Employment Development Department published job projections for the period of 2018 to 2028. Although the data included both San Mateo and San Francisco counties, some assumptions can be made about the impact of the number of jobs and corresponding wages in the region.

Many of the occupations with the most job openings will earn the employee less than \$35,000 annually. Based on 2021 State income limits, such individuals are considered extremely low-income.

TABLE 4: OCCUPATIONS WITH THE MOST JOB OPENINGS (2018-2028)

Occupational Title	Total Job Openings	Median Hourly Wage	Median Annual Wage
Personal Care Aides	62,650	\$12.16	\$25,283
Combined Food Prep and Servers, incl. Fast Food	52,090	\$13.71	\$28,524
Wait Staff	48,580	\$14.73	\$30,632
Software Developers, Applications	38,710	\$67.39	\$140,175
Cashiers	37,140	\$13.54	\$28,161
Janitors and Cleaners, Except Maids and Housekeeping Cleaners	28,060	\$14.81	\$30,807

Occupational Title	Total Job Openings	Median Hourly Wage	Median Annual Wage
Cooks, Restaurant	26,840	\$16.35	\$34,016
Retail Salespersons	25,280	\$14.28	\$29,700
Market Research Analysis/Marketing Specialists	24,060	\$42.60	\$88,609
Taxi Drivers and Chauffeurs	21,540	\$18.57	\$38,644

Notes: 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. If an estimate could not be provided for wages, they are excluded from this table. Excludes "All Other" categories. These are residual codes that do not represent a detailed occupation.

Sources: U.S. Bureau of Labor Statistics' Current Employment Statistics (CES) March 2019 benchmark and Quarterly Census of Employment and Wages (QCEW) industry employment, <https://www.labormarketinfo.edd.ca.gov/data/employment-projections.html>.

4.6 EXTREMELY LOW-INCOME HOUSEHOLDS

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.¹⁰ In Belmont, 59.5% of households make more than 100% of the Area Median Income (AMI),¹¹ compared to 11.1% making less than 30% of AMI, which is considered extremely low-income (see Figure 12).

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

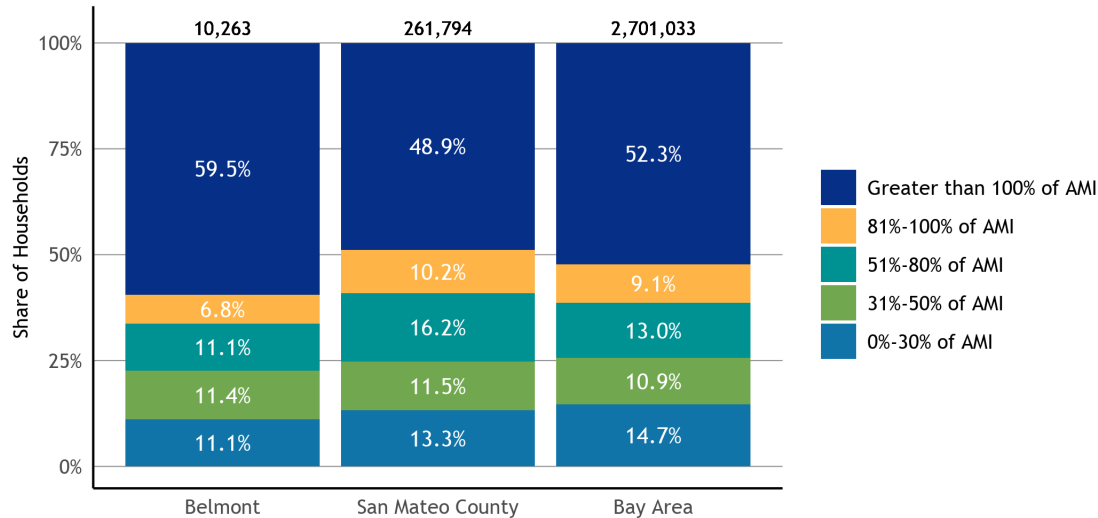
State law requires jurisdictions to estimate the number of extremely low-income households—those earning less than 30% of median income. According to the data illustrated in Figure 12, 2,318 of Belmont's households are 0-50% AMI, while 1,143 are extremely low-income. Therefore, extremely low-income households represent 49.3% of households who are 0-50% AMI. Figure 12 represents a tabulation of Census Bureau Data, in keeping with HCD's guidance

¹⁰ Bohn, S. et al. 2020. Income Inequality and Economic Opportunity in California. *Public Policy Institute of California*.

¹¹ Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas, and the nine county Bay Area includes the following metropolitan areas: Napa Metro Area (Napa County), Oakland-Fremont Metro Area (Alameda and Contra Costa Counties), San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties), San Jose-Sunnyvale-Santa Clara Metro Area (Santa Clara County), Santa Rosa Metro Area (Sonoma County), and Vallejo-Fairfield Metro Area (Solano County). The AMI levels in this chart are based on the HUD metro area where this jurisdiction is located. Households making between 80 and 120 percent of the AMI are moderate-income, those making 50 to 80 percent are low-income, those making 30 to 50 percent are very low-income, and those making less than 30 percent are extremely low-income. This is then adjusted for household size.

to use U.S. Census data to calculate the percentage of very low-income RHNA that qualifies for extremely low-income households.

Figure 12: Households by Household Income Level



Universe: Occupied housing units.

Notes: Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas, and the nine county Bay Area includes the following metropolitan areas: Napa Metro Area (Napa County), Oakland-Fremont Metro Area (Alameda and Contra Costa Counties), San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties), San Jose-Sunnyvale-Santa Clara Metro Area (Santa Clara County), Santa Rosa Metro Area (Sonoma County), and Vallejo-Fairfield Metro Area (Solano County). The AMI levels in this chart are based on the HUD metro area where this jurisdiction is located. The data that is reported for the Bay Area is not based on a regional AMI but instead refers to the regional total of households in an income group relative to the AMI for the county where that household is located. Local jurisdictions are required to provide an estimate for their projected extremely low-income households (0-30% AMI) in their Housing Elements. HCD's official Housing Element guidance notes that jurisdictions can use their RHNA for very low-income households (those making 0-50% AMI) to calculate their projected extremely low-income households. As Bay Area jurisdictions have not yet received their final RHNA numbers, this document does not contain the required data point of projected extremely low-income households. The report portion of the housing data needs packet contains more specific guidance for how local staff can calculate an estimate for projected extremely low-income households once jurisdictions receive their 6th cycle RHNA numbers.

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

For the data table behind this figure, please refer to the Data Packet Workbook, Table ELI-01.

Extremely low-income (ELI) households are more likely to experience housing problems and cost burden. In Belmont, there are approximately 365 ELI owner-households, representing 5.9% of owners throughout the City, and 779 ELI renter-households, representing 12.6% of renters. A nearly equal portion of ELI renter households experience cost burden greater than 30% compared to ELI owner-households, at 70.7% and 70.8%, respectively. However, as a group, renters in the extremely low-income category are disproportionately represented in cost burden—ELI renters represent 32.6% of all renter households with a cost burden, while ELI owners represent 25.2% of all owners with a cost burden. Similarly, 52.8% of renter households with a severe cost burden earn extremely low incomes, while that figure is just 43.6% for owner households.

Overall, 11.1% of households in Belmont are ELI. By comparison, 13.3% of households countywide are in the extremely low-income category. While White households make up the bulk of the ELI households (61.2%), many households of color also earn extremely low incomes. For example, Asian/Pacific Islander households make up 15.7% of extremely low-income households in Belmont, while Hispanic/Latinx make up 12.7% (while only representing 8.7% of the total population). Racial/ethnic, income, and housing problem demographics are further described in Appendix D, Affirmatively Furthering Fair Housing, of this Housing Element.

RESOURCES FOR EXTREMELY LOW-INCOME HOUSEHOLDS

The City remains committed to assisting in the development and preservation of existing affordable housing and will continue to focus on lifting residents out of poverty by providing a safe, attractive, and affordable place to live. While housing alone does not eliminate poverty, access to adequate shelter must be provided before people can strive for self-sufficiency.

The Housing Choice Voucher Program managed by San Mateo County also serves very low- and extremely low-income families, senior households, and persons with disabilities. The City aims to provide additional resources for ELI households through programs outlined in this Housing Element's Implementation Plan, Appendix G. This includes additional fair housing actions from the AFFH. While there are County resources available for ELI households, this group remains vulnerable throughout the City and the region.

Understanding households by income and race/ethnic group can shed light on the challenges faced by people of color in terms of access to affordable housing. Table 5 illustrates the disparities between White and other racial/ethnic groups. Although 11% of households are extremely low-income citywide, 30% of Black/African American households are in this income category.¹²

There are also regional 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.

¹²These figures are somewhat skewed because White households make up the vast majority of households in the City but are illustrative of differences.

TABLE 5: HOUSEHOLD DISTRIBUTION BY RACE/ETHNICITY AND INCOME

Racial / Ethnic Group	0%-30% of AMI	31%-50% of AMI	51%-80% of AMI	81%-100% of AMI	Greater than 100% of AMI
American Indian or Alaska Native, Non-Hispanic	14%	0%	0%	0%	86%
Asian / API, Non-Hispanic	7%	6%	9%	4%	74%
Black or African American, Non-Hispanic	30%	0%	20%	7%	43%
White, Non-Hispanic	11%	12%	12%	8%	56%
Other Race or Multiple Races, Non-Hispanic	25%	14%	7%	5%	48%
Hispanic or Latinx	16%	25%	8%	9%	42%
Total	11%	11%	11%	7%	59%

Universe: Occupied housing units.

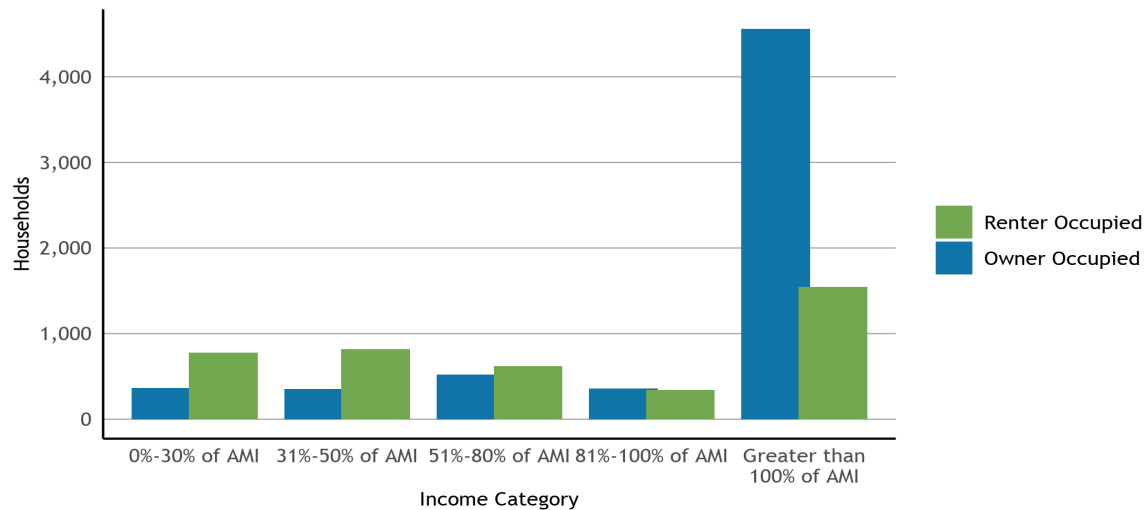
Notes: Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas, and the nine county Bay Area includes the following metropolitan areas: Napa Metro Area (Napa County), Oakland-Fremont Metro Area (Alameda and Contra Costa Counties), San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties), San Jose-Sunnyvale-Santa Clara Metro Area (Santa Clara County), Santa Rosa Metro Area (Sonoma County), and Vallejo-Fairfield Metro Area (Solano County). The AMI levels in this chart are based on the HUD metro area where this jurisdiction is located. For the purposes of this graph, the “Hispanic or Latinx” racial/ethnic group represents those who identify as having Hispanic/Latinx ethnicity and may also be members of any racial group. All other racial categories on this graph represent those who identify with that racial category and do not identify with Hispanic/Latinx ethnicity.

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

For the data table behind this figure, please refer to the Data Packet Workbook, Table ELI-02.

In Belmont, the largest proportion of renters and homeowners fall into the *Greater than 100% of AMI* income group (see Figure 13).

Figure 13: Household Income Level by Tenure



Universe: Occupied housing units.

Notes: Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas, and the nine county Bay Area includes the following metropolitan areas: Napa Metro Area (Napa County), Oakland-Fremont Metro Area (Alameda and Contra Costa Counties), San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties), San Jose-Sunnyvale-Santa Clara Metro Area (Santa Clara County), Santa Rosa Metro Area (Sonoma County), and Vallejo-Fairfield Metro Area (Solano County). The AMI levels in this chart are based on the HUD metro area where this jurisdiction is located.

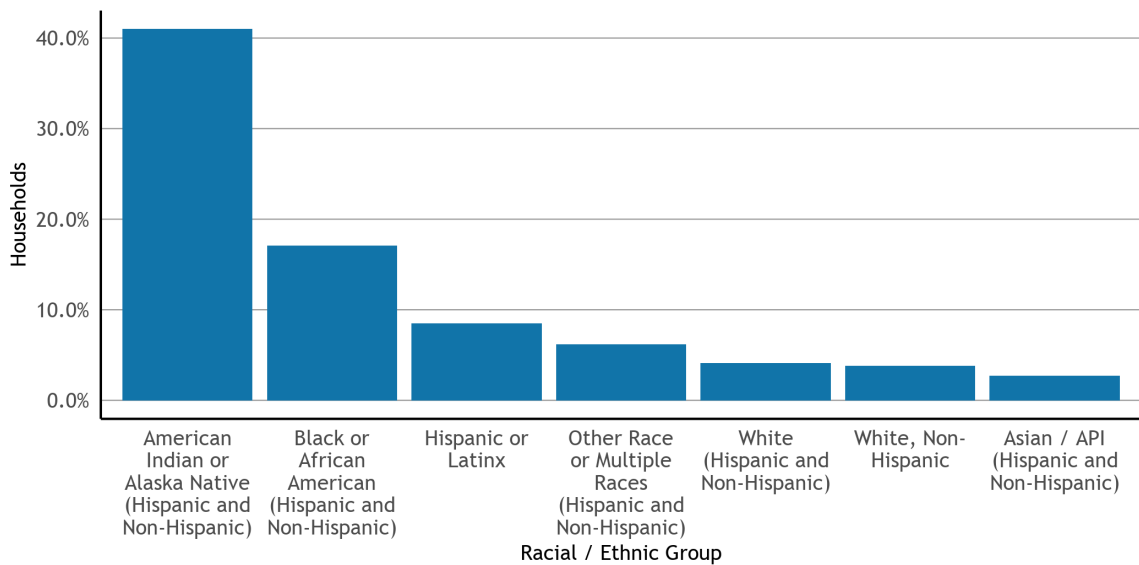
Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release.

For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-21.

Currently, people of color are more likely to experience poverty and financial instability because of federal and local housing policies that have historically excluded them from the same opportunities extended to White residents.¹³ These economic disparities also leave communities of color at higher risk for housing insecurity, displacement, and homelessness.

In Belmont, *American Indian or Alaska Native (Hispanic and Non-Hispanic)* residents experience the highest poverty rates, followed by *Black or African American (Hispanic and Non-Hispanic)* residents (see Figure 14).

Figure 14: Poverty Status by Race



Universe: Population for whom poverty status is determined.

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

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B17001(A-I). For the data table behind this figure, please refer to the Data Packet Workbook, Table ELI-03.

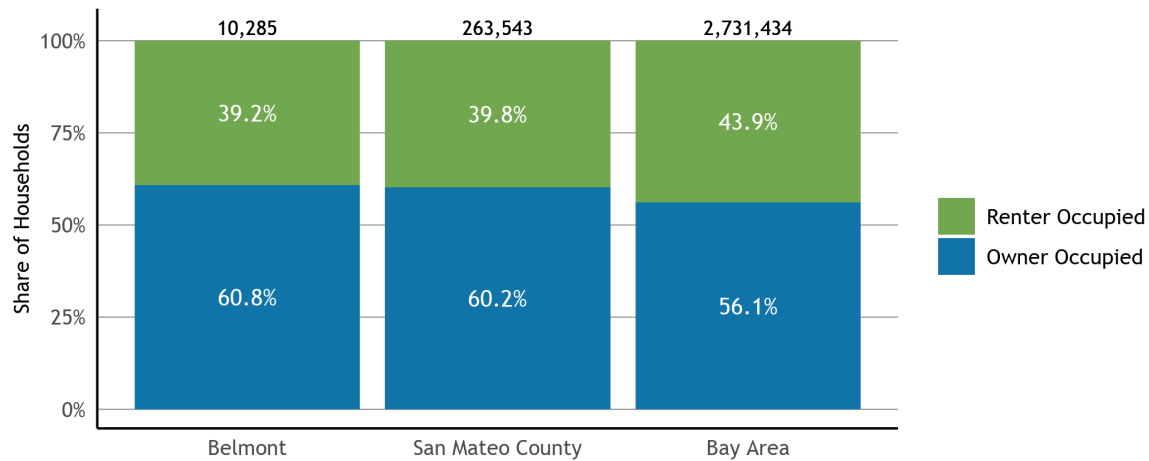
4.7 TENURE

The number of residents who own their homes compared to those who rent their homes can help identify the level of housing insecurity, or the ability for individuals to stay in their homes, within a city and region. Generally, renters may be displaced more quickly if prices increase. In Belmont, there are 10,285 housing units, and fewer residents rent (39.2%) than own (60.8%). As

¹³ Moore, E., Montojo, N. and Mauri, N., 2019. *Roots, Race & Place: A History of Racially Exclusionary Housing the San Francisco Bay Area.* *Hass Institute.*

seen in Figure 15, this is similar to San Mateo County, though in the Bay Area as a whole, a greater percentage rent (43.9%).

Figure 15: Housing Tenure



Universe: Occupied housing units.

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

For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-16.

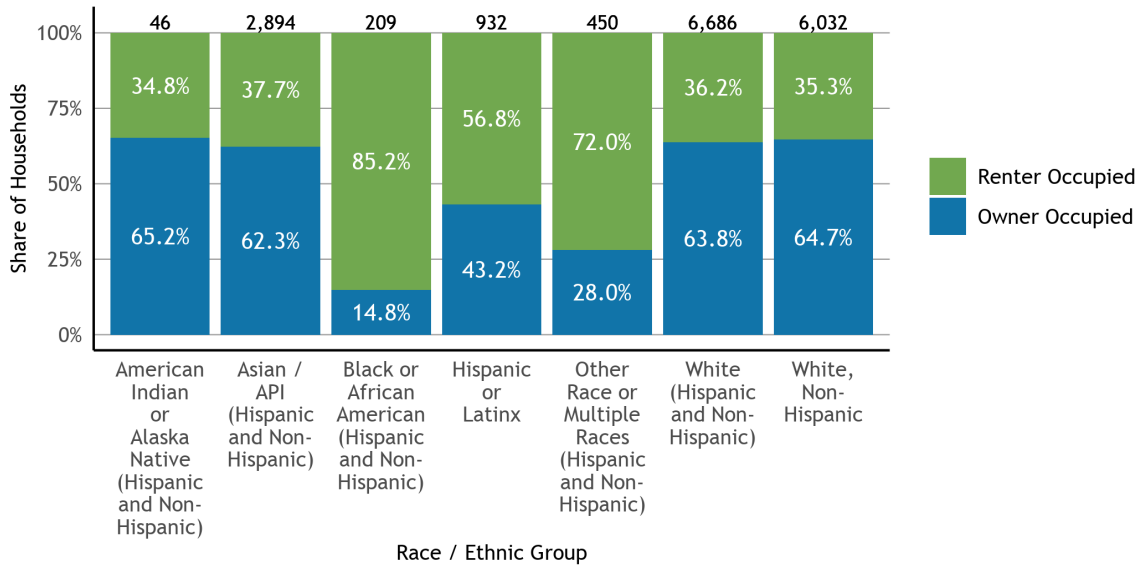
Homeownership rates often vary considerably across race/ethnicity in the Bay Area and throughout the country. These disparities not only reflect differences in income and wealth but also stem from federal, state, and local policies that limited access to homeownership for communities of color while facilitating homebuying for White residents. While many of these policies, such as redlining, have been formally disbanded, the impacts of race-based policies are still evident across Bay Area communities.¹⁴

In Belmont, 14.8% of Black households owned their homes, while homeownership rates were 43.2% for Latinx households, 62.3% for Asian households, and 63.8% for White households. Recent changes to State law require local jurisdictions to examine these dynamics and other fair housing issues when updating their Housing Elements.

The age of residents who rent or own their home can also signal housing challenges. Younger households tend to rent and may struggle to buy a first home in the Bay Area due to high housing costs, while senior homeowners seeking to downsize may have limited options in an expensive housing market.

¹⁴ 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 16: Housing Tenure by Race of Householder



Universe: Occupied housing units.

Notes: For this table, the Census Bureau does not disaggregate racial groups by Hispanic/Latinx ethnicity. However, data for the white racial group is also reported for white householders who are not Hispanic/Latinx. Since residents who identify as white and Hispanic/Latinx may have very different experiences within the housing market and the economy from those who identify as white and non-Hispanic/Latinx, data for multiple white sub-groups are reported here. The racial/ethnic groups reported in this table are not all mutually exclusive. Therefore, the data should not be summed as the sum exceeds the total number of occupied housing units for this jurisdiction. However, all groups labelled "Hispanic and Non-Hispanic" are mutually exclusive, and the sum of the data for these groups is equivalent to the total number of occupied housing units.

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

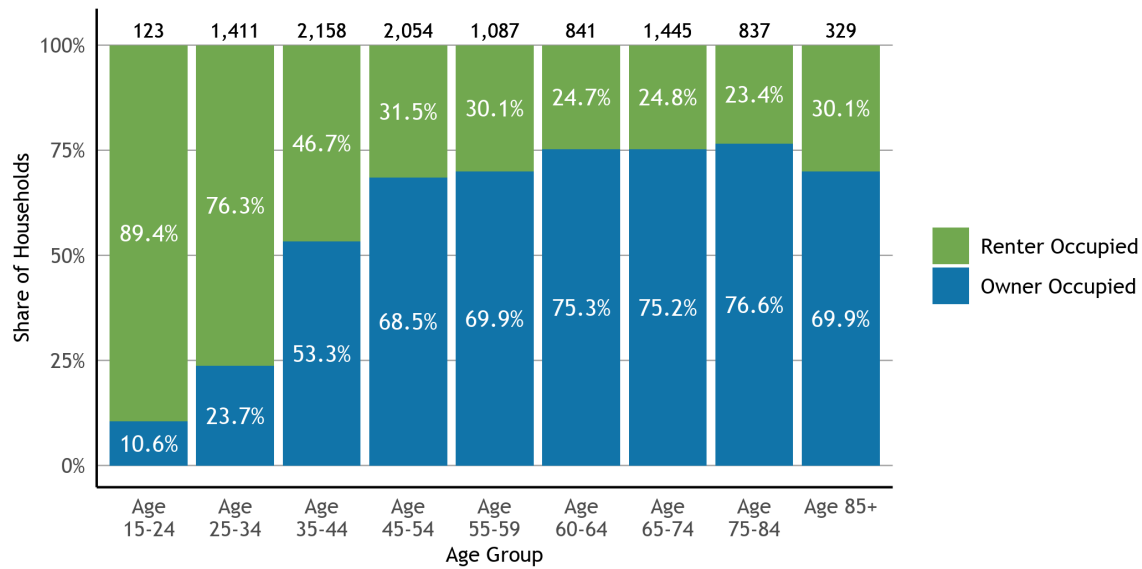
For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-20.

In Belmont, 58.4% of householders between the ages of 25 and 44 are renters, while 25.0% of householders over 65 are (see Figure 17).

Information regarding the year in which a household moved to their current residence further illustrates the differences between long-term residents, who tend to trend older, and newer residents. As shown in Figure 18, 93% of households that moved in in 1989 or earlier are owner occupied, whereas only 22% of households that moved in in 2017 or later are owner occupied.

In many cities, homeownership rates for households in single-family homes are substantially higher than the rates for households in multi-family housing. In Belmont, 91.1% of households in detached single-family homes are homeowners, while 11.3% of households in multi-family housing are homeowners (see Figure 19).

Figure 17: Housing Tenure by Age

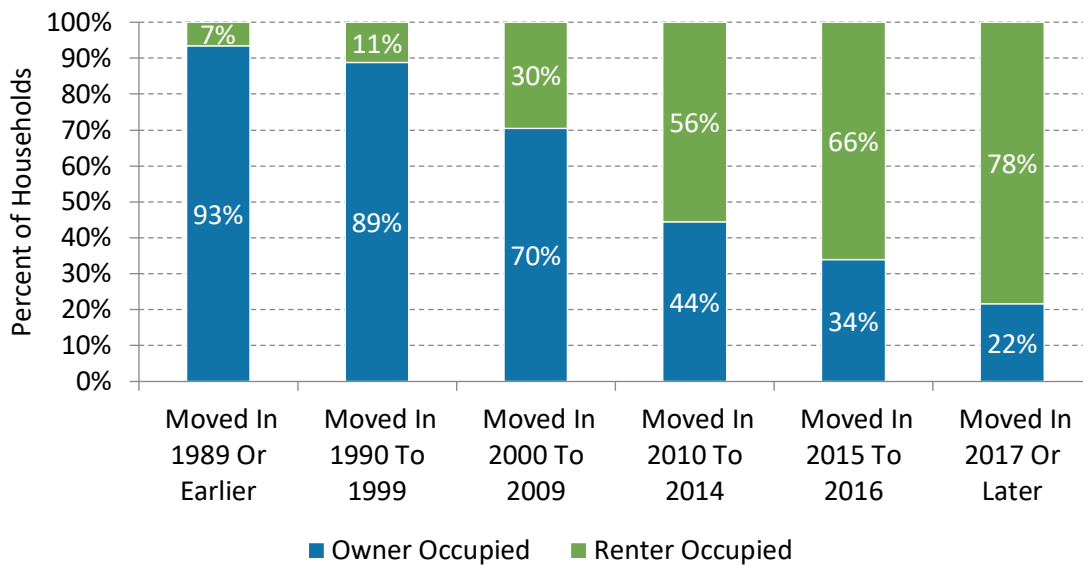


Universe: Occupied housing units.

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

For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-18.

Figure 18: Housing Tenure by Year Moved to Current Residence

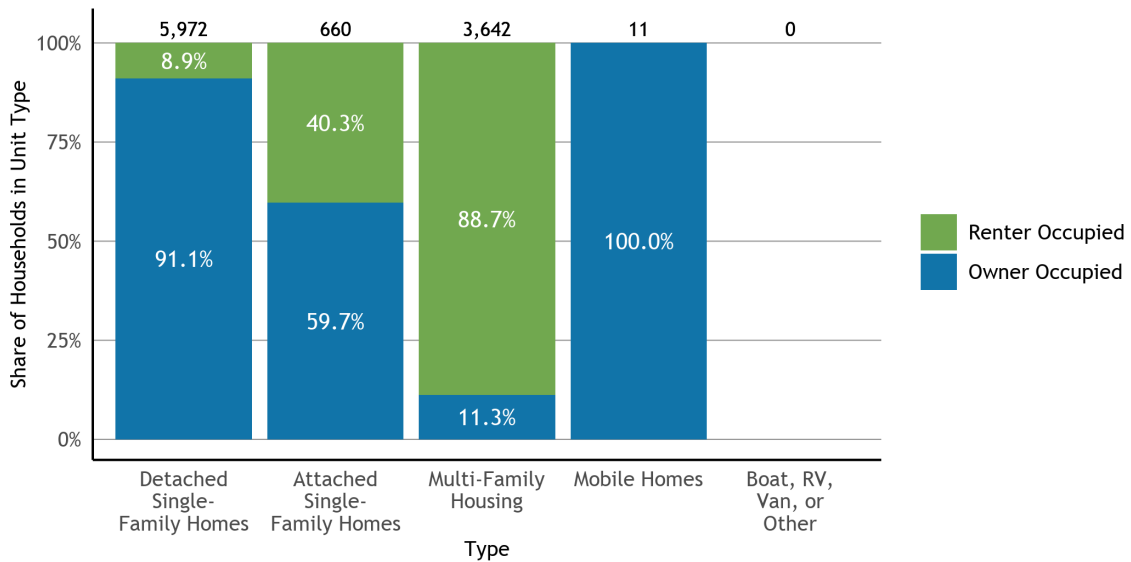


Universe: Occupied housing units.

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25038.

For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-19.

Figure 19: Housing Tenure by Housing Type



Universe: Occupied housing units.

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25032. For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-22.

4.8 DISPLACEMENT

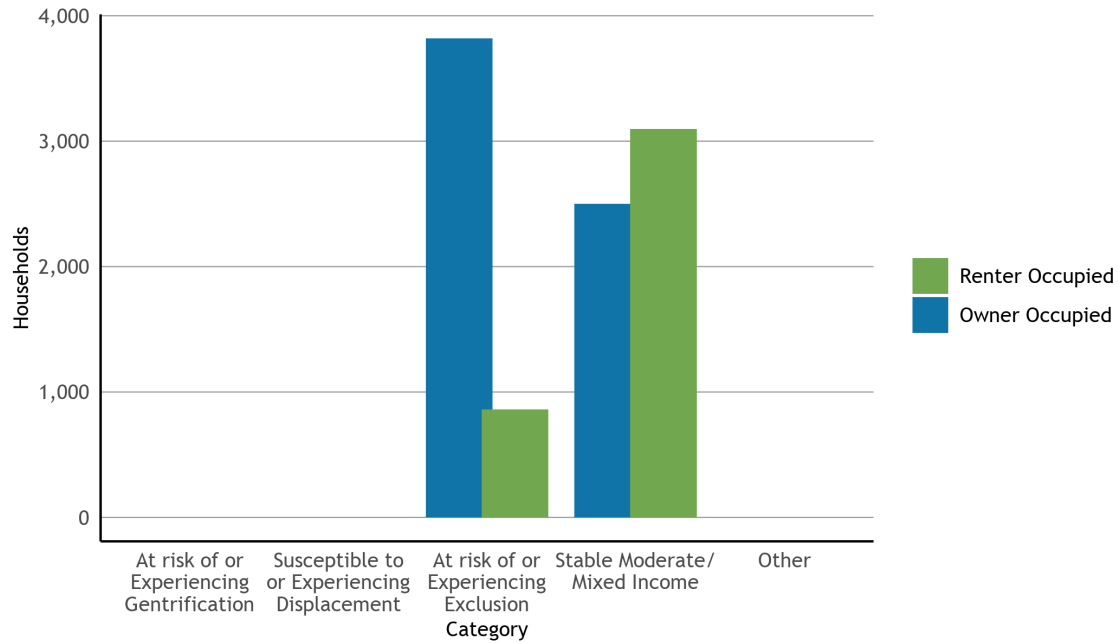
Due to increasing housing prices, displacement is a major concern in the Bay Area. Displacement has the most severe impacts on low- and moderate-income residents. When individuals or families are forced to leave their homes and communities, they also lose their support network.

The University of California (UC), Berkeley has mapped all neighborhoods in the Bay area, identifying their risk for gentrification. They found that in Belmont, no households are *Susceptible to or Experiencing Displacement* or are *At Risk of or Undergoing Gentrification*.

Equally important, some Bay Area neighborhoods do not have housing appropriate for a broad section of the workforce. UC Berkeley estimates that 45.5% of households in Belmont live in neighborhoods where low-income households are likely to be excluded due to prohibitive housing costs.¹⁵

¹⁵ 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 20 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>.

Figure 20: Households by Displacement Risk and Tenure



Universe: Households.

Notes: Displacement data is available at the census tract level. Staff aggregated tracts up to jurisdiction level using census 2010 population weights, assigning a tract to jurisdiction in proportion to block level population weights. Total household count may differ slightly from counts in other tables sourced from jurisdiction level sources. Categories are combined as follows for simplicity: At risk of or Experiencing Exclusion: At Risk of Becoming Exclusive; Becoming Exclusive; Stable/Advanced Exclusive At risk of or Experiencing Gentrification: At Risk of Gentrification; Early/Ongoing Gentrification; Advanced Gentrification Stable Moderate/Mixed Income: Stable Moderate/Mixed Income Susceptible to or Experiencing Displacement: Low-Income/Susceptible to Displacement; Ongoing Displacement Other: High Student Population; Unavailable or Unreliable Data.

Source: Urban Displacement Project for classification, American Community Survey 5-Year Data (2015-2019), Table B25003 for tenure. For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-25.

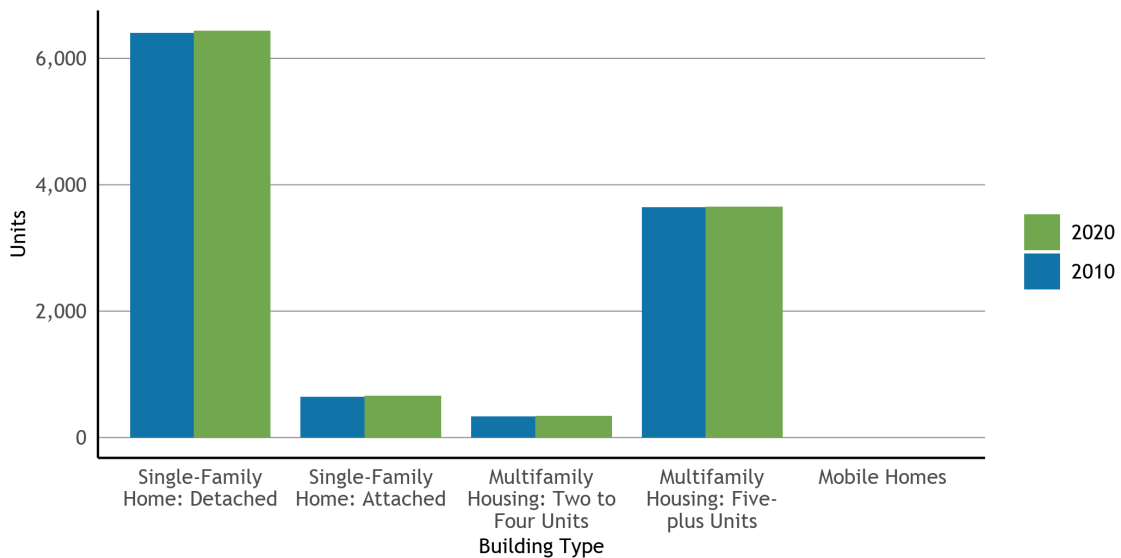
5. HOUSING STOCK CHARACTERISTICS

5.1 HOUSING TYPES, YEAR BUILT, VACANCY, AND PERMITS

In recent years, most housing produced in the region and across the State has 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 more options across incomes and tenure, from young households seeking homeownership to seniors looking to downsize and age-in-place.

The 2020 Belmont housing stock was made up of 58.0% single-family detached homes, 32.9% multi-family homes with five or more units, 6.0% single-family attached homes, 3.1% multi-family homes with two to four units, and 0.0% mobile homes (see Figure 21). From 2010 to 2020, the housing type that experienced the most growth was *Single-Family Home: Detached*.

Figure 21: Housing Type Trends



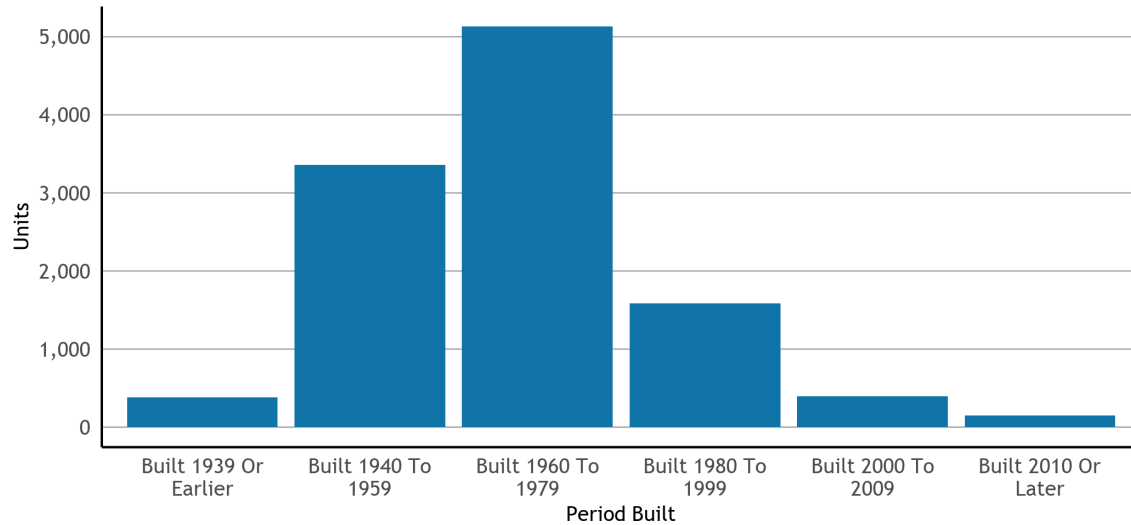
Universe: Housing units.

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

For the data table behind this figure, please refer to the Data Packet Workbook, Table HSG-01.

For several decades, Bay Area housing production has not kept pace with the demand; the total number of units built and available has not yet neared the regional population and job growth. In Belmont, the largest proportion of the housing stock (5,131 units) was built from 1960 to 1979 (see Figure 22). Since 2010, 1.4% (or 149 units) of the current housing stock has been built.

Figure 22: Housing Units by Year Structure Built



Universe: Housing units.

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

For the data table behind this figure, please refer to the Data Packet Workbook, Table HSG-04.

Vacant units constitute 6.5% of Belmont’s overall housing stock. The rental vacancy rate stands at 10.0%, while the ownership vacancy rate is 0.8%. Of the vacant units, the most common type of vacancy is *For Rent* (see Figure 23).¹⁶

Throughout the Bay Area, vacancies make up 2.6% of the total housing units, with homes listed *for rent*; units *for seasonal, 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 American Community Survey or Decennial Census. Units classified as *for seasonal, recreational, or occasional use* are those held for short-term periods of use throughout the year, such as vacation rentals and short-term rentals like AirBnB.

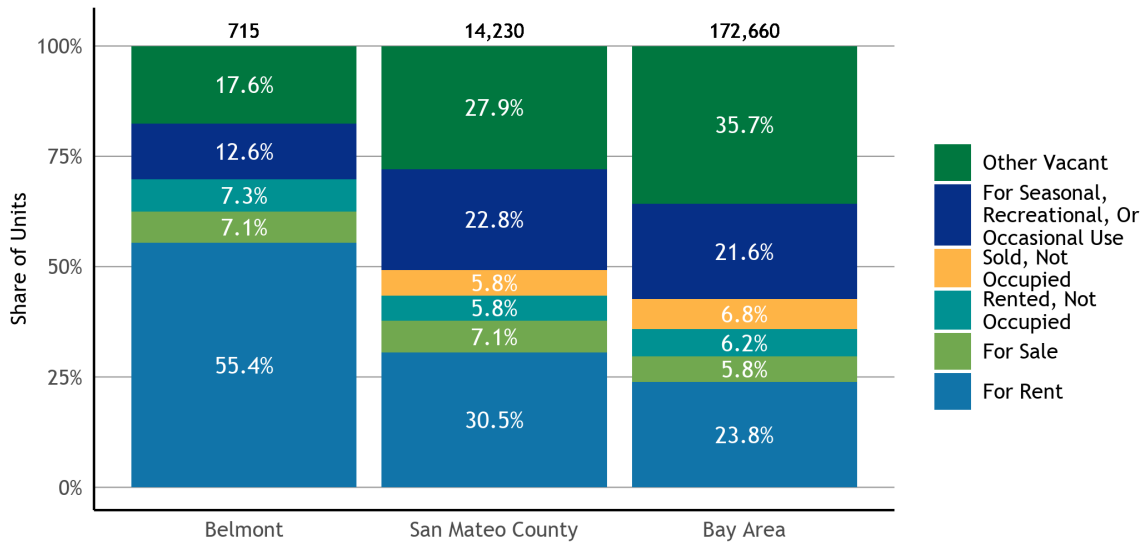
The Census Bureau classifies units as *other vacant* when vacancy occurs due to foreclosure, personal/ family reasons, legal proceedings, repairs/renovations, abandonment, preparation for being rented or sold, or an extended absence for reasons such as a work assignment, military duty, or incarceration.¹⁷ In a region with a thriving economy and housing market like the Bay Area, units being renovated/repared and prepared for rental or sale are also likely to represent a large portion of this category. Additionally, the need for seismic retrofitting in older housing

¹⁶ The vacancy rates by tenure is for a smaller universe than the total vacancy rate first reported, which in principle includes the full stock (6.5%). 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*.

¹⁷ 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>.

stock could influence *other vacant* rates.¹⁸ In Belmont, the State Department of Finance currently estimates the vacancy rate is approximately 5.7%. Countywide, it is estimated at 5.5%.

Figure 23: Vacant Units by Type



Universe: Vacant housing units.

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

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

From 2015 to 2021, Belmont issued permits for 508 housing units. Of these, 70% were for above moderate-income housing, 10% were for moderate-income housing, and 20% were for low- or very low-income housing (see Table 6).

TABLE 6: CITY OF BELMONT HOUSING PERMITTING (2015-2021)

Income Group	Number of Permits Issued
Above Moderate-income Permits	378
Moderate-income Permits	0
Low-income Permits	84
Very Low-income Permits	46

Universe: Housing permits issued between 2015 and 2021.

Notes: HCD uses the following definitions for the four income categories: Very Low-income: units affordable to households making less than 50% of the Area Median Income for the county in which the jurisdiction is located. Low-income: units affordable to households making between 50% and 80% of the Area Median Income for the county in which the jurisdiction is located. Moderate Income: units affordable to households making between 80% and 120% of the Area Median Income for the county in which the jurisdiction is located. Above Moderate-income: units affordable to households making above 120% of the Area Median Income for the county in which the jurisdiction is located.

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

¹⁸ 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.

5.2 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. It is typically faster and cheaper to preserve existing affordable units that are at risk of converting to market-rate than it is to build new affordable housing.

The California Housing Partnership Corporation’s (CHPC) Preservation Database provides comprehensive data available on at-risk units. Table 7 shows the number of subsidized affordable housing at risk of losing their affordable status and converting to market-rate in Belmont, the County, and the region. However, this database does not include all deed-restricted affordable units in the State, so there may be at-risk assisted units in a jurisdiction that are not captured in this table.

TABLE 7: ASSISTED UNITS AT RISK OF CONVERSION

Risk Level	Belmont	San Mateo County	Bay Area
Low	84	4,656	110,177
Moderate	0	191	3,375
High	0	359	1,854
Very High	0	58	1,053
Total Assisted Units in Database	84	5,264	116,459

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

Notes: While California Housing Partnership’s Preservation Database is the state’s most comprehensive source of information on subsidized affordable housing at risk of losing its affordable status and converting to market-rate housing, this database does not include all deed-restricted affordable units in the state. Consequently, there may be at-risk assisted units in a jurisdiction that are not captured in this data table. Per HCD guidance, local jurisdictions must also list the specific affordable housing developments at-risk of converting to market rate uses. This document provides aggregate numbers of at-risk units for each jurisdiction, but local planning staff should contact Danielle Mazzella with the California Housing Partnership at dmazzella@chpc.net to obtain a list of affordable properties that fall under this designation.

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

This table is included in the Data Packet Workbook as Table RISK-01.

According to the CHPC Perseveration Database, there are 84 assisted units in Belmont and of these units, none are at *High Risk* or *Very High Risk* of conversion.¹⁹

¹⁹ California Housing Partnership uses the following categories for assisted housing developments in its database:

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

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

As of 2023, Belmont had a total of 302 affordable units, rather than the 84 noted by CHPC; this discrepancy is partially due to the City funding a few projects solely through the now-dissolved Redevelopment Agency.

As Table 8 indicates, there are a total of 106 units that are potentially at risk of conversion during this Housing Element planning period, which includes 104 units located in the Bonnie Brae Terrace complex and two single family properties at Oxford Place. The Bonnie Brae Terrace property has been purchased by a new owner who has stated their commitment to maintaining the unit affordability. The Oxford Place units are owned by moderate-income households who can either remain in the property or sell it after 2030. Any proceeds above a calculated moderate-income sales price would be taken by the City, which incentivizes an owner to sell to another qualifying purchaser. Belmont has confirmed that it does not have any publicly assisted housing units at-risk of conversion in the next ten years; however, annual monitoring as part of the Housing Element Annual Progress Report is still an important tool to ensure unit affordability.

This Housing Element includes Program H2.1, Support Retention of Existing Lower-income Units, which directs the City to continue monitoring all units potentially at risk of conversion to market rate annually.

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

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

TABLE 8: CITY OF BELMONT INVENTORY OF PUBLICLY ASSISTED HOUSING PROJECTS (2023)

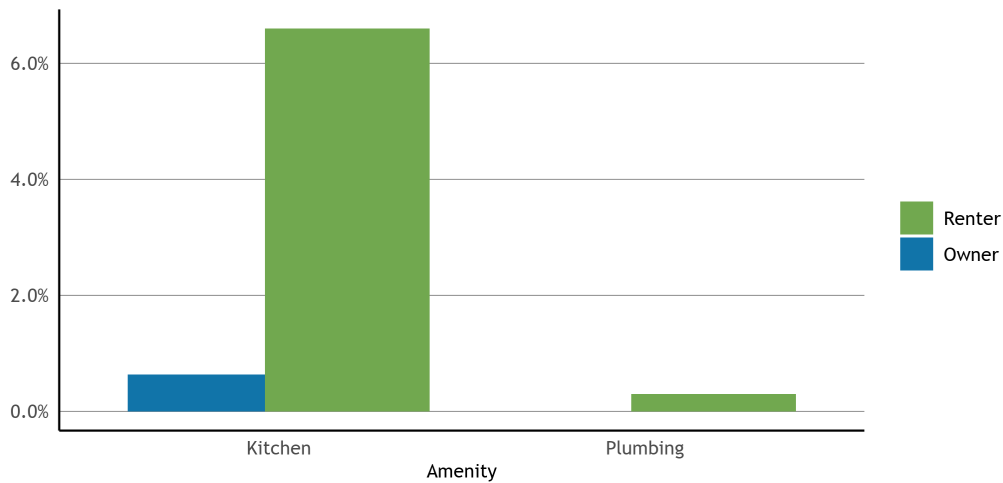
Project Name	Building Type	Total Units	Affordable Units	Household Type	Funding Sources	Conversion Risk	Expiration Date
Bonnie Brae Terrace (formerly Lesley Terrace): 2400 Carlmont Dr	Apartment	164	164	All lower-income groups	Section 8 (60 units)	Low	Section 8 - 2039
				Disabled; Seniors	Program 236 (104 units)	Medium	2031 (operator has indicated rents will remain below market rate)
Horizons: 825 Old County Rd	Apartment	24	24	Very low-income Families; Disabled	Section 8; City Housing Successor Loan; Program 202/162	Low; Non-profit manages	2039
Belmont House: 730 El Camino Real	Group Home	6	6	Low-income Disabled	City RDA; City Housing Successor	Low; City-owned	No expiration; City-owned property
Crestview Group Home: 503 Crestview	Group Home	6	6	Low- and moderate-income Disabled	County CDBG & State deferred loan; City Housing Successor	Low; City-owned	No expiration; City-owned property
Sterling Point: 935 Old County Rd	Townhomes (BMR)	48	7	Moderate-income First-time home buyers	City RDA	Medium; Units owned by residents	2039, 2041, 2041, 2041, 2042, 2042, 2042
Waltermire Apartments: 631 Waltermire St	Apartment	10	2	Moderate-income Families	City RDA	Medium	2039
Belmont Apartments: 800 F St	Apartment	24	24	Very low-income Disabled	City RDA; HOME; Mental Health Association of SMC	Low; MHA Owned	2058
Oxford Place: 25 and 41 Oxford Place	Single-family detached	21	2	Moderate-income Families	City RDA	Medium; BMR units owned by residents	2030 (30-year term renews when property sold)
Emmett House, 1000 O'Neill	Duplex	2	2	Moderate-income Families	City RDA	Low; City-owned	No expiration; City-owned property
Firehouse Square, 1300 El Camino Real	Apartment	66	65	All lower-income groups;	AHF, County, City, TCAC	Low; Non-profit manages	2090
Total		371	302				

Source: City of Belmont, 2024.

5.3 SUBSTANDARD HOUSING

Regional housing costs are among the highest in the country, which could result in households—particularly renters—living in substandard conditions to afford housing. Generally, there is limited data on the extent of substandard housing in a community; however, the Census Bureau data included in Figure 24 provides a sense of some substandard conditions that may be present in Belmont. For example, 6.6% of Belmont renters reported lacking a complete kitchen and 0.3% of renters lacked complete plumbing, compared to 0.6% of owners who lack a complete kitchen and 0.0% of owners who lacked complete plumbing.

Figure 24: Substandard Housing Issues



Universe: Occupied housing units.

Notes: Per HCD guidance, this data should be supplemented by local estimates of units needing to be rehabilitated or replaced based on recent windshield surveys, local building department data, knowledgeable builders/developers in the community, or nonprofit housing developers or organizations.

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

For the data table behind this figure, please refer to the Data Packet Workbook, Table HSG-06.

Another measure of housing condition is the age of housing. In general, the older the unit, the greater it can be assumed to need some level of rehabilitation. A general rule in the housing industry is that structures older than 20 years begin to show signs of deterioration and require renovation to maintain their quality. Unless properly maintained, homes older than 50 years can pose health, safety, and welfare problems for occupants.

Consistent with State law, Table 9 estimates the number of units in need of rehabilitation or replacement in Belmont. Although the exact number of units in need of rehab is not currently known, the State accepts estimates based on a formula that assumes the older the unit, the more likely the rehab is in need. Rehabilitation needs can range from minor repairs to major structural replacements.

By applying an increasing percentage to the housing stock in each age category, it is estimated that there are approximately 1,311 units in need of some level of rehabilitation in Belmont,

representing 12% of the housing stock. It is estimated that nearly all units in need of rehabilitation can be repaired without replacement.

TABLE 9: AGE OF HOUSING STOCK AND ESTIMATED REHABILITATION NEEDS

	Net # of Units	Percent of Total	Units Needing Rehab, %	Units Needing Rehab, Total
Built 2014 or Later	87	0%		
Built 2010 to 2013	62	0%		
Built 2000 to 2009	395	1%	0.50%	2
Built 1990 to 1999	674	2%	1%	7
Built 1980 to 1989	909	2%	3%	27
Built 1970 to 1979	2,165	5%	5%	108
Built 1960 to 1969	2,966	7%	10%	297
Built 1950 to 1959	2,525	6%	20%	505
Built 1940 to 1949	833	2%	30%	250
Built 1939 or Earlier	384	1%	30%	115
Total	11,000	26%		1,311
<i>Percentage of Total Units</i>				<i>12%</i>
<i>Units that Can Be Repaired</i>			<i>99.50%</i>	<i>1,304</i>
<i>Units that Must Be Replaced</i>			<i>0.50%</i>	<i>7</i>

Source: American Community Survey 5-year estimates, 2019.

The most common code enforcement activities, as provided by Belmont’s Code Enforcement Officer, includes residential yard and tree maintenance, illegal dumping, construction without permits, abandoned/inoperable vehicles, smoking in multi-family residential units (which is prohibited in Belmont), trash and debris in public view, rodent infestation, and dilapidated property fences. None of these frequent violation types provides insight into the estimated number of housing units in need of rehabilitation. Additionally, the code enforcement officer has confirmed that estimating rehabilitation needs based on age of housing stock is a reasonable measure. There do not appear to be any visual housing stock trends (i.e., boarded up windows/doors, roof or other structural damage, or significant external damage) in Belmont that would further guide housing rehabilitation needs/services.

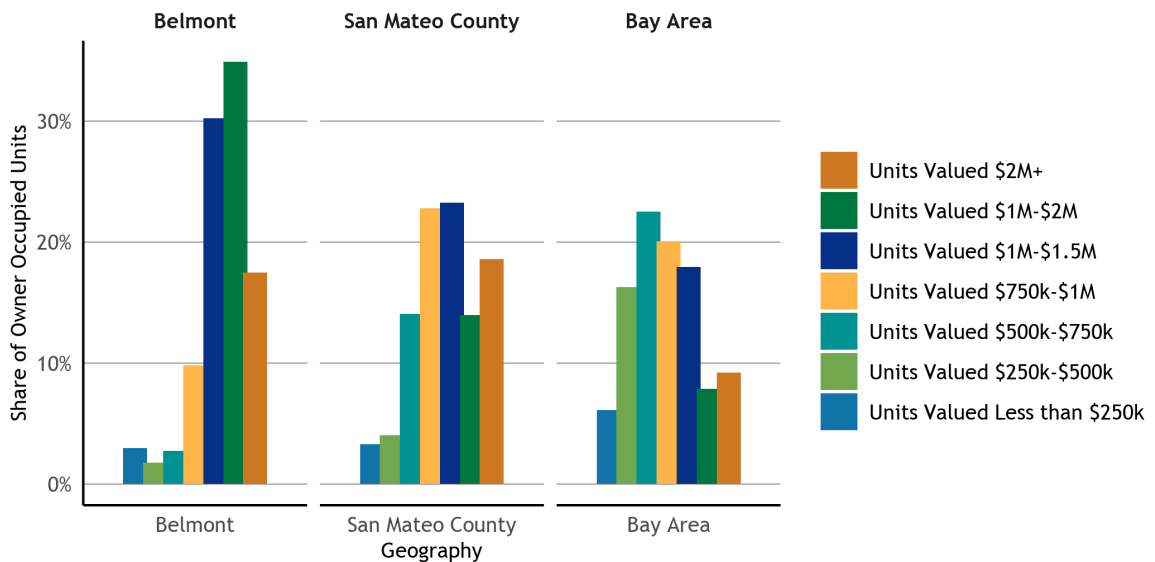
Housing Program H3.3 directs the City of Belmont to conduct a best practice review of local housing rehabilitation programs that the City can help provide to residents, and to research rehabilitation service providers that could target special needs groups.

5.4 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 San Francisco Bay Area, the costs of housing have long been among the highest in the nation. According to Zillow, the typical home value in Belmont in December 2020 was estimated at \$1,876,610, while the largest proportion of homes were valued between \$1M to \$2M (see Figure 25). By comparison, the typical home value was \$1,418,330 in San Mateo County and \$1,077,230 in the Bay Area, with the largest share of units valued at \$1M to \$1.5M (County) and \$500k to \$750k (region).

The region’s home values have increased steadily since 2000, apart from a decrease during the Great Recession. The rise in home prices has been especially steep since 2012, with the median Bay Area home value nearly doubling. In Belmont, the typical home value has increased 166.7% between 2001 and 2020, from \$703,600 to \$1,876,610. Generally, the increase in home value has been greater in Belmont than in the County and the region (see Figure 26).

Figure 25: Home Values of Owner-Occupied Units

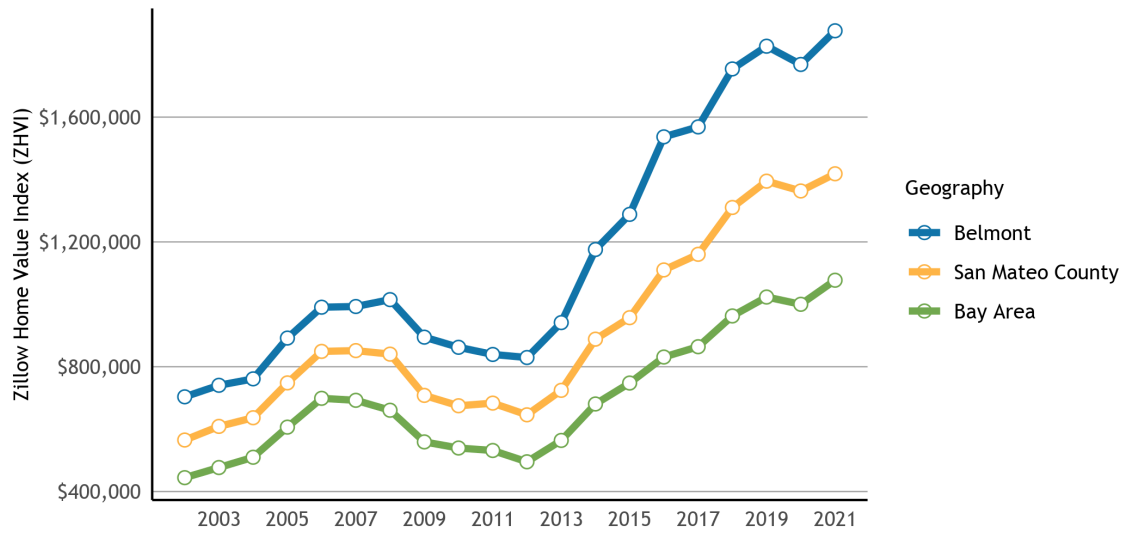


Universe: Owner-occupied units.

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

For the data table behind this figure, please refer to the Data Packet Workbook, Table HSG-07.

Figure 26: Zillow Home Value Index (ZHVI)



Universe: Owner-occupied housing units.

Notes: Zillow describes the ZHVI as a smoothed, seasonally adjusted measure of the typical home value and market changes across a given region and housing type. 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. More information on the ZHVI is available from Zillow. The regional estimate is a household-weighted average of county-level ZHVI files, where household counts are yearly estimates from DOF’s E-5 series. For unincorporated areas, the value is a population weighted average of unincorporated communities in the county matched to census-designated population counts.

Source: Zillow, Zillow Home Value Index (ZHVI). Refer to the Workbook, Table HSG-o8.

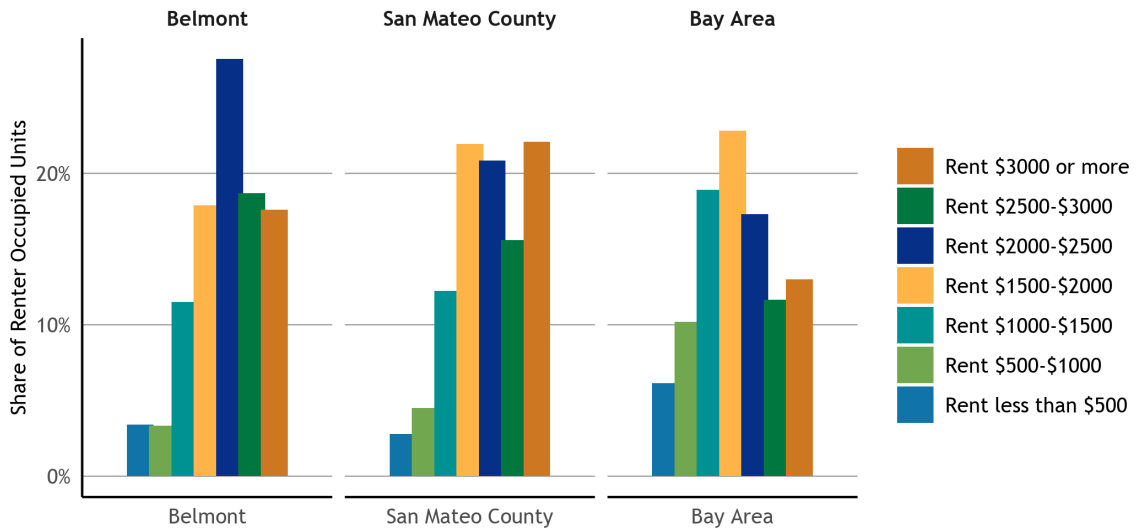
Like home values, rents have increased dramatically across the Bay Area in recent years. Many renters have been priced out, evicted, or displaced, particularly communities of color. Residents finding themselves in one of these situations may have had to choose between commuting long distances to their jobs and schools or moving out of the region, or even state.

In Belmont, from 2015 to 2019, the largest proportion (27.6%) of rental units fell into the *Rent \$2,000-\$2,500* category (see Figure 27). During this period, 18.7% of units were in the *Rent \$2,500-\$3,000* category. Looking beyond the city, the largest share of units is in the *\$3,000 or more* category (County), or *\$1,500-\$2,000* category (region).

From 2009 to 2019, the median rent increased by 76.8% in Belmont, from \$1,520 to \$2,250 monthly (see Figure 28). In San Mateo County, the median rent increased 41.1%, from \$1,560 to \$2,200. The median rent in the region was lower, but also increased significantly during this time, from \$1,200 to \$1,850, a 54% increase.²⁰

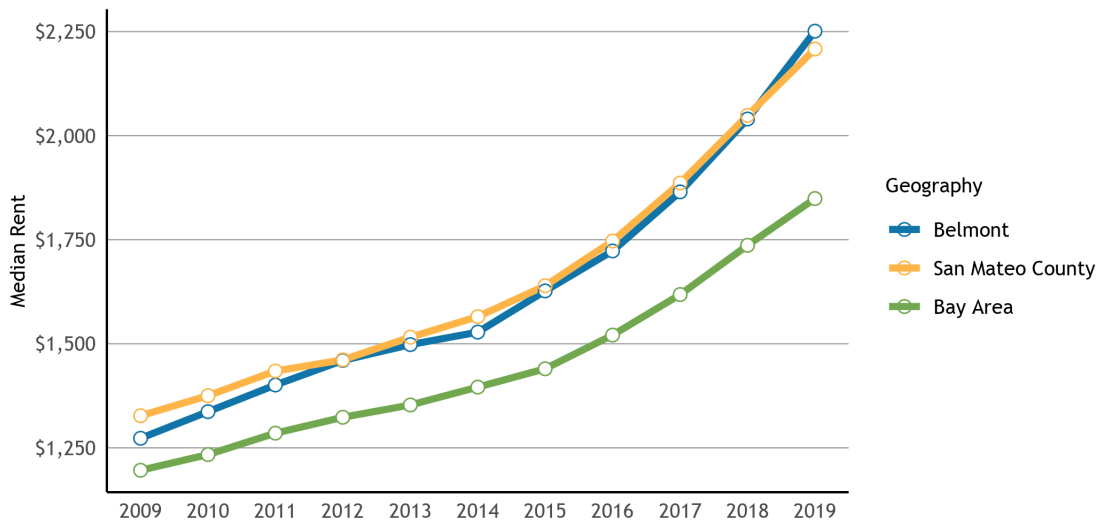
²⁰ While the data on home values shown in Figure 26 comes from Zillow, Zillow does not have data on rent prices available for most Bay Area jurisdictions. To have a more comprehensive dataset on rental data for the region, the rent data in this document comes from the U.S. Census Bureau’s American Community Survey, which may not fully reflect current rents. Local jurisdiction staff may want to supplement the data on rents with local realtor data or other sources for rent data that are more current than Census Bureau data.

Figure 27: Contract Rents for Renter-Occupied Units



Universe: Renter-occupied housing units paying cash rent.
 Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25056.
 For the data table behind this figure, please refer to the Data Packet Workbook, Table HSG-09.

Figure 28: Median Contract Rent



Universe: Renter-occupied housing units paying cash rent.
 Notes: For unincorporated areas, median is calculated using distribution in B25056.
 Source: U.S. Census Bureau, American Community Survey 5-Year Data releases, starting with 2005-2009 through 2015-2019, B25058, B25056 (for unincorporated areas). County and regional counts are weighted averages of jurisdiction median using B25003 rental unit counts from the relevant year.
 For the data table behind this figure, please refer to the Data Packet Workbook, Table HSG-10.

5.5 HOUSING AFFORDABILITY

The National Association of Homebuilders reports that California cities have some of the lowest homeowner affordability rates in the Country, defined as the percentage of homes affordable to a median income family. Despite high median incomes, many in the Bay Area cannot afford to purchase a home. The San Francisco-Redwood City Division, of which Belmont is a part, ranked 230th out of 233 metropolitan areas studied in the first quarter of 2021.

TABLE 10: HOUSING OPPORTUNITY INDEX (FIRST QUARTER, 2021)

	Homes Affordable to Median Income Households	Median Family Income (1,000s)	Median Sales Price (1,000s)	National Affordability Rank
Los Angeles-Long Beach-Glendale, CA ^a	11.6%	78.7	729	233
Salinas, CA	15.1%	80.9	725	232
San Francisco-Redwood City-South SF ^a	17.4%	143.4	1,305	230
Anaheim-Santa Ana-Irvine, CA ^a	18.2%	104.8	825	229
Napa, CA	22.1%	101.5	691	228
San Diego-Carlsbad, CA	22.4%	95.1	665	227
San Luis Obispo-Paso Robles-Arroyo Grande, CA	26.0%	97.8	675	226
Oxnard-Thousand Oaks-Ventura, CA	27.4%	98.8	650	225
Santa Cruz-Watsonville, CA	28.5%	111.9	850	224
Santa Maria-Santa Barbara, CA	28.8%	90.1	678	223
Stockton-Lodi, CA	29.6%	74.0	462	222
San Jose-Sunnyvale-Santa Clara, CA	29.9%	151.3	1,120	220
Oakland-Hayward-Berkeley, CA ^a	31.2%	121.3	795	219

^a Indicate Metropolitan Divisions. All others are MSAs.

Source: National Association of Homebuilders, 2021, <https://www.nahb.org/news-and-economics/housing-economics/indices/housing-opportunity-index>.

Trulia—an online residential real estate site for homebuyers, sellers, renters, and real estate professionals—provides statistics based on actual sales of housing by location. According to a study conducted by zip code in 2019, only 0.2% of homes were affordable to the metropolitan median income of \$101,000. The median home value reported by Trulia was \$1,570,186. See <https://www.trulia.com/research/affordable-neighborhoods/> for more information.

The high cost of housing means people wanting to own a home in Belmont must have significant incomes, even for the relatively less-expensive condominiums. In Belmont, a household must earn more than \$400,000 annually to afford the Trulia-documented median priced home.

The decreasing supply of affordable rental units is a countywide phenomenon; it can include Ellis Act evictions (where an owner of a rental property decides to leave the rental business) to owner move-in evictions. Until additional construction of rental units occurs, the combination

of strong demand and low vacancies will contribute to create an increasingly severe shortage of rental units, decreasing their affordability.

Table 11 illustrates affordable rents by income category. In the case of an extremely low-income household of two people (for example, a single parent with a child), the annual income of \$43,850 translates to a full-time job paying \$21.08 per hour. In this scenario, the maximum rent they could afford would be approximately \$1,096 per month—far below average rents in Belmont, even for studios. According to statistics on RentCafe.com, an online data aggregator, the average rent for an apartment was \$2,401 as of June 2021, a decrease of 14% from the previous year but still much higher than what a lower-income household can afford. A household must earn at least \$96,040 annually to afford the average rent.

TABLE 11: AFFORDABLE RENTS FOR TWO- AND THREE-PERSON HOUSEHOLDS

Income Category	Percent of Median	Income Limit (Two-Person Household)	Two-Person Affordable Rent	Income Limit (Three-Person Household)	Three-Person Affordable Rent
Extremely Low-income	30%	\$43,850	\$1,096	\$49,350	\$1,234
Very Low-income	50%	\$73,100	\$1,828	\$82,250	\$2,056
Low-income	80%	\$117,100	\$2,928	\$131,750	\$3,294
Median-income	100%	\$119,700	\$2,993	\$134,650	\$3,366
Moderate-income	120%	\$143,600	\$3,590	\$161,550	\$4,039

Notes: Affordable rents are calculated based on 30% of annual income divided by 12 months.

Source: State Department of Housing and Community Development and City of Belmont, 2021.

Through Section 8 and other housing programs, the Department of Housing and Community Development (HUD) provides rental housing assistance to lower-income households. According to HUD, 62 households in Belmont currently receive Section 8 rental assistance, in the form of Housing Choice Vouchers.

5.6 OVERPAYMENT AND OVERCROWDING

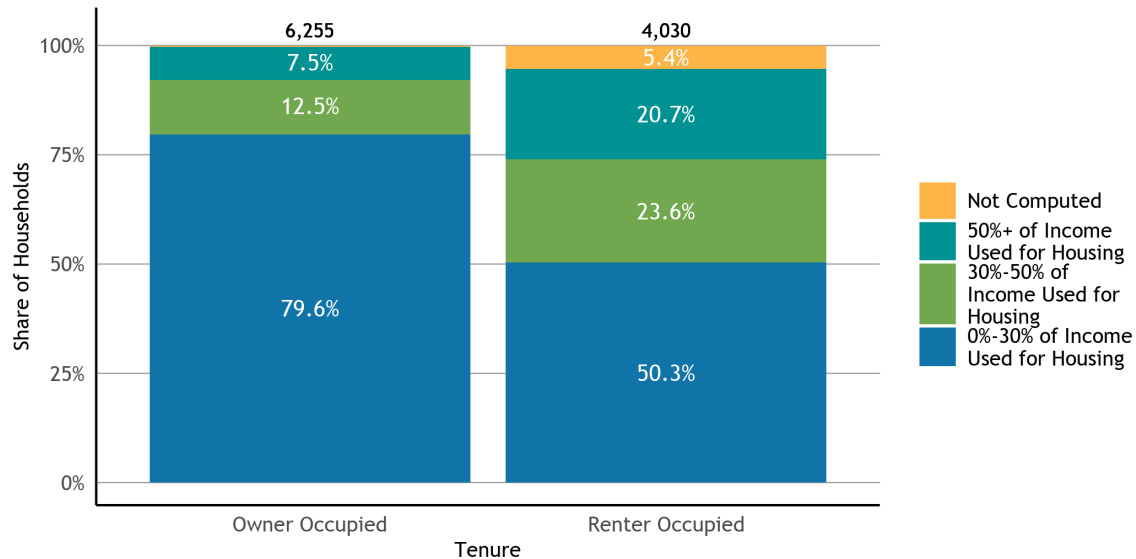
A household is considered “cost-burdened” if it spends more than 30% of its monthly income on housing costs, while those who spend more than 50% of their income on housing costs are considered “severely cost-burdened.” Low-income residents are the most impacted by high housing costs and experience the highest rates of cost burden. Spending such large portions of their incomes on housing puts low-income households at higher risk of displacement, eviction, or homelessness.

Renters are often more cost-burdened than owners. While home prices have increased dramatically, homeowners often have mortgages with fixed rates, whereas renters are more likely to be impacted by ongoing market increases.

Looking at cost burden by tenure in Belmont, 23.6% of renters spend 30% to 50% of their income on housing compared to 12.5% of those who own (see Figure 29). In addition, 20.7% of

renters are severely cost-burdened (spending 50% or more of their income on housing), while only 7.5% of owners fall into this category.

Figure 29: Cost Burden by Tenure



Universe: Occupied housing units.

Notes: Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes. HUD defines cost-burdened households as those whose monthly housing costs exceed 30% of monthly income, while severely cost-burdened households are those whose monthly housing costs exceed 50% of monthly income.

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

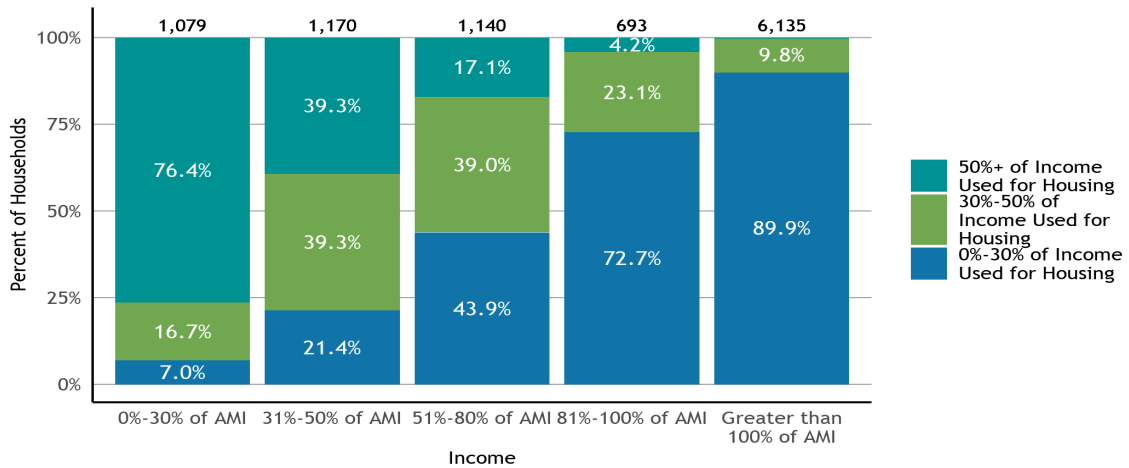
For the data table behind this figure, please refer to the Data Packet Workbook, Table OVER-06.

In Belmont, 15% of households spend 50% or more of their income on housing, while 18.1% spend 30% to 50% (see Figure 30). However, these rates vary greatly across income categories; for example, 76.4% of Belmont households making less than 30% of AMI spend most of their income on housing. For Belmont residents making more than 100% of AMI, just 0.3% are severely cost-burdened, and 89.9% of those making more than 100% of AMI spend less than 30% of their income on housing.

Currently, people of color are more likely to experience poverty and financial instability because of federal and local housing policies that have historically excluded them from the same opportunities extended to White residents. As a result, they often spend a greater percentage of their income on housing and are at a greater risk of housing insecurity.

American Indian or Alaska Native, Non-Hispanic residents are the most cost burdened with 50.0% spending 30% to 50% of their income on housing, and Black or African American, Non-Hispanic residents are the most severely cost burdened with 30% spending more than 50% of their income on housing (see Figure 31).

Figure 30: Cost Burden by Income Level



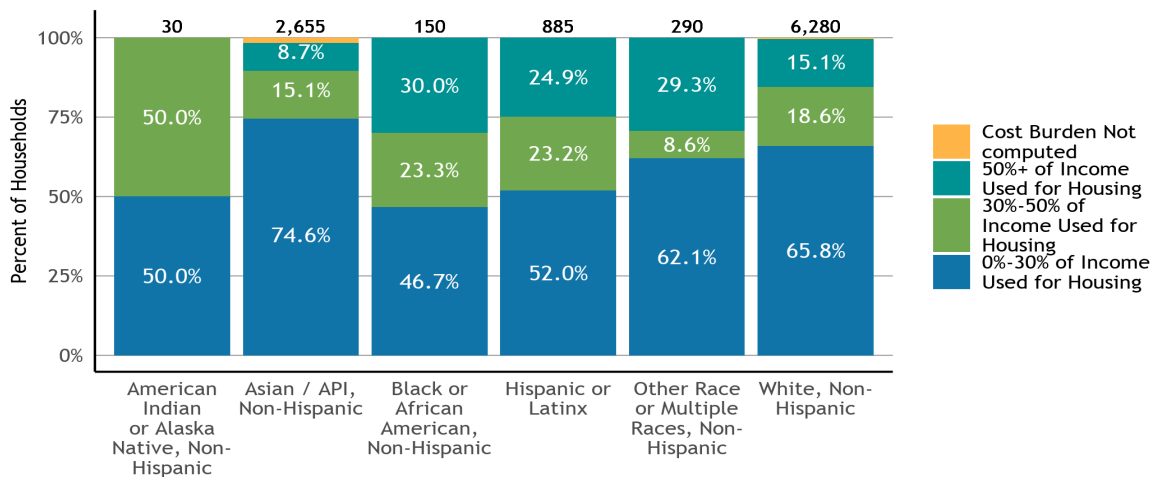
Universe: Occupied housing units.

Notes: Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes. HUD defines cost-burdened households as those whose monthly housing costs exceed 30% of monthly income, while severely cost-burdened households are those whose monthly housing costs exceed 50% of monthly income. Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas, and the nine county Bay Area includes the following metropolitan areas: Napa Metro Area (Napa County), Oakland-Fremont Metro Area (Alameda and Contra Costa Counties), San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties), San Jose-Sunnyvale-Santa Clara Metro Area (Santa Clara County), Santa Rosa Metro Area (Sonoma County), and Vallejo-Fairfield Metro Area (Solano County). The AMI levels in this chart are based on the HUD metro area where this jurisdiction is located.

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

For the data table behind this figure, please refer to the Data Packet Workbook, Table OVER-05.

Figure 31: Cost Burden by Race



Universe: Occupied housing units.

Notes: Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes. HUD defines cost-burdened households as those whose monthly housing costs exceed 30% of monthly income, while severely cost-burdened households are those whose monthly housing costs exceed 50% of monthly income. For the purposes of this graph, the "Hispanic or Latinx" racial/ethnic group represents those who identify as having Hispanic/Latinx ethnicity and may also be members of any racial group. All other racial categories on this graph represent those who identify with that racial category and do not identify with Hispanic/Latinx ethnicity.

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

For the data table behind this figure, please refer to the Data Packet Workbook, Table OVER-08.

Cost burden by tenure and income category reveals the extent to which lower-income groups, especially renters, pay too much for housing costs. Table 12 below provides data on extremely low-, very low, and low-income households compared with higher-income groups. Both extremely low-income renters and owners have high rates of cost burden, as do other lower-income groups. However, overall, owners are much less impacted by cost burdens than renters: in total, 18% of owners have a cost burden of more than 30%, and only 8% have burdens over 50%. By contrast, 42% of all renters have a cost burden of more than 30%, and 20% have the severe cost burden of over 50%. Although renters account for about 39% of all households, they represent more than 60% of cost-burdened households.

Large family households often have special housing needs due to a lack of adequately sized affordable housing. The higher costs required for homes with multiple bedrooms can result in larger families experiencing a disproportionate cost burden when compared to the rest of the population, increasing their risk of housing insecurity.

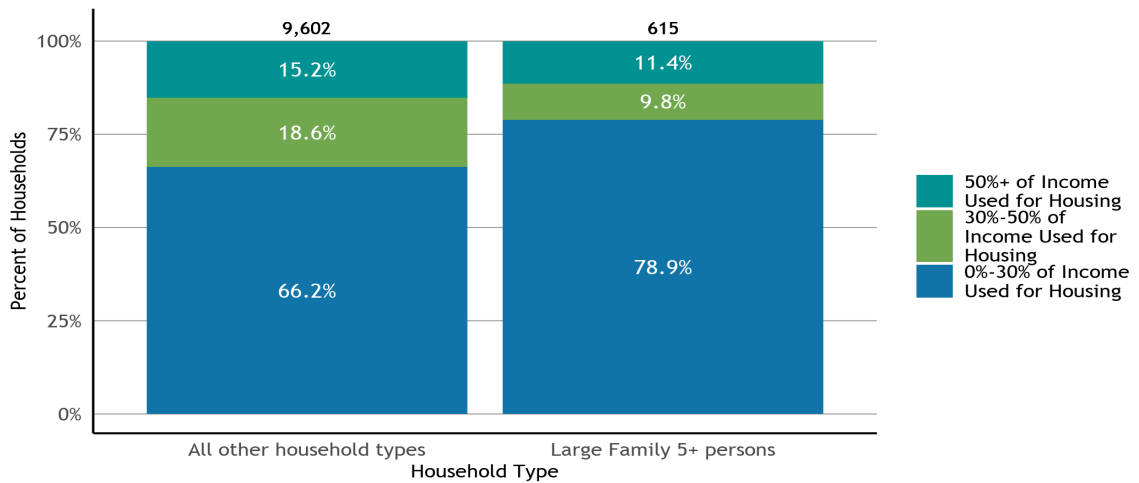
In Belmont, 9.8% of large family households experience a cost burden of 30% to 50%, while 11.4% of households spend more than half of their income on housing (see Figure 32). Approximately 18.6% of all other households have a cost burden of 30% to 50%, with 15.2% of households spending more than 50% of their income on housing.

TABLE 12: COST BURDEN BY TENURE AND INCOME

Income by Cost Burden (Renters Only)	Cost Burden > 30%	Cost Burden > 50%	Total
Household Income <= 30% HAMFI	555	425	785
Household Income >30% to <=50% HAMFI	585	315	625
Household Income >50% to <=80% HAMFI	375	65	775
Household Income >80% to <=100% HAMFI	120	0	385
Household Income >100% HAMFI	70	0	1,455
Total	1,705	805	4,030
Income by Cost Burden (Owners only)			
Household Income <= 30% HAMFI	255	205	360
Household Income >30% to <=50% HAMFI	165	105	410
Household Income >50% to <=80% HAMFI	190	100	550
Household Income >80% to <=100% HAMFI	195	45	505
Household Income >100% HAMFI	315	15	4,435
Total	1,120	470	6,255

Source: CHAS Databook, <https://www.huduser.gov/portal/datasets/cp.html>.

Figure 32: Cost Burden by Household Size



Universe: Occupied housing units.

Notes: Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is “select monthly owner costs”, which includes mortgage payment, utilities, association fees, insurance, and real estate taxes. HUD defines cost-burdened households as those whose monthly housing costs exceed 30% of monthly income, while severely cost-burdened households are those whose monthly housing costs exceed 50% of monthly income.

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

For the data table behind this figure, please refer to the Data Packet Workbook, Table OVER-09.

When cost-burdened seniors are no longer able to make house payments or pay rents, displacement from their homes can occur, placing 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.

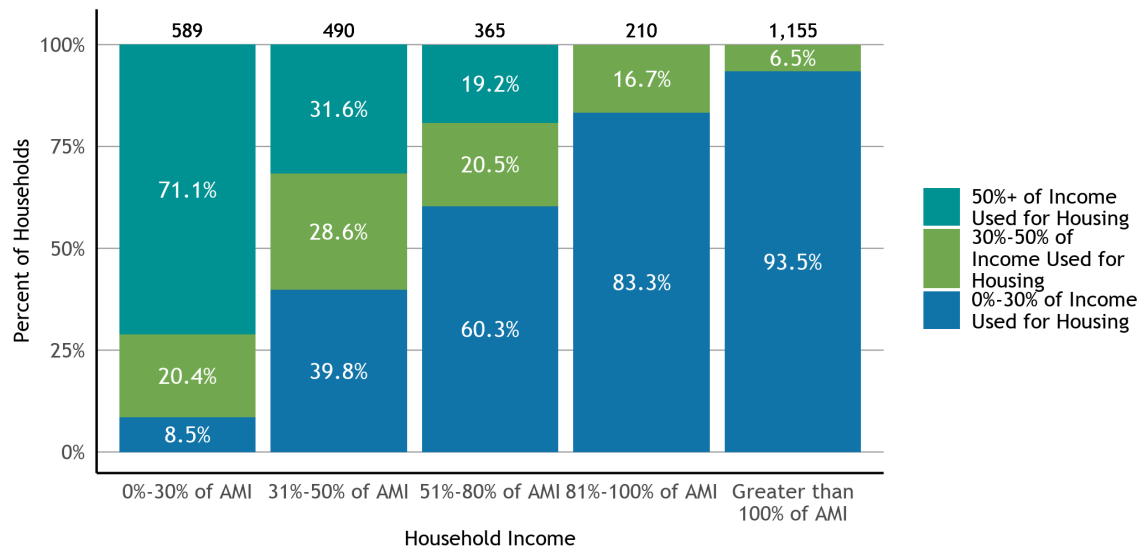
71.1% of seniors making less than 30% of AMI are spending most of their income on housing (see Figure 33). For seniors making more than 100% of AMI, 93.5% are not cost-burdened and spend less than 30% of their income on housing.

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 Belmont, 4.8% of households that rent are severely overcrowded (more than 1.5 occupants per room), compared to 0.5% of households that own (see Figure 34). 4.7% of renters experience moderate overcrowding (1 to 1.5 occupants per room), compared to 0.8% for those who own.

Figure 33: Cost-Burdened Senior Households by Income Level



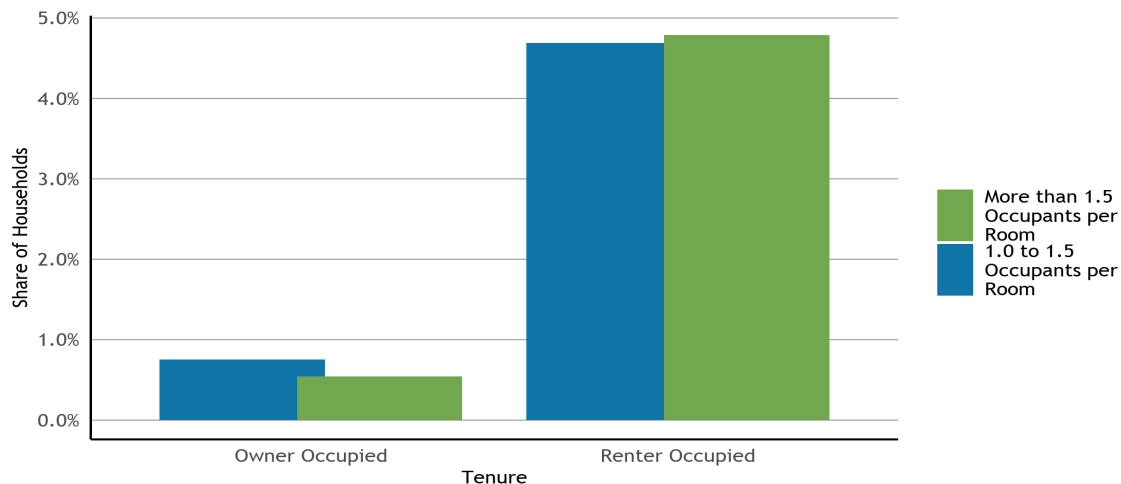
Universe: Senior households.

Notes: For the purposes of this graph, senior households are those with a householder who is aged 62 or older. Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes. HUD defines cost-burdened households as those whose monthly housing costs exceed 30% of monthly income, while severely cost-burdened households are those whose monthly housing costs exceed 50% of monthly income. Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas, and the nine county Bay Area includes the following metropolitan areas: Napa Metro Area (Napa County), Oakland-Fremont Metro Area (Alameda and Contra Costa Counties), San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties), San Jose-Sunnyvale-Santa Clara Metro Area (Santa Clara County), Santa Rosa Metro Area (Sonoma County), and Vallejo-Fairfield Metro Area (Solano County). The AMI levels in this chart are based on the HUD metro area where this jurisdiction is located.

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

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

Figure 34: Overcrowding by Tenure and Severity



Universe: Occupied housing units.

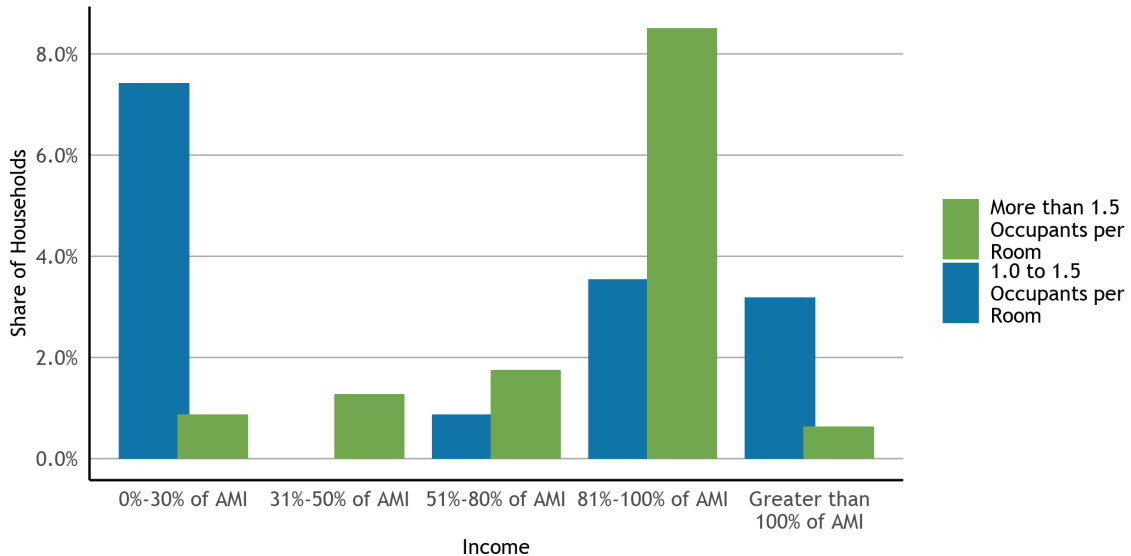
Notes: The Census Bureau defines an overcrowded unit as one occupied by 1.01 persons or more per room (excluding bathrooms and kitchens), and units with more than 1.5 persons per room are considered severely overcrowded.

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

For the data table behind this figure, please refer to the Data Packet Workbook, Table OVER-01.

Overcrowding often disproportionately impacts low-income households. 0.9% of very low-income households (below 50% AMI) experience severe overcrowding, while 0.6% of households above 100% experience this level of overcrowding (see Figure 35).

Figure 35: Overcrowding by Income Level and Severity



Universe: Occupied housing units.

Notes: The Census Bureau defines an overcrowded unit as one occupied by 1.01 persons or more per room (excluding bathrooms and kitchens), and units with more than 1.5 persons per room are considered severely overcrowded. Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas, and the nine county Bay Area includes the following metropolitan areas: Napa Metro Area (Napa County), Oakland-Fremont Metro Area (Alameda and Contra Costa Counties), San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties), San Jose-Sunnyvale-Santa Clara Metro Area (Santa Clara County), Santa Rosa Metro Area (Sonoma County), and Vallejo-Fairfield Metro Area (Solano County). The AMI levels in this chart are based on the HUD metro area where this jurisdiction is located.

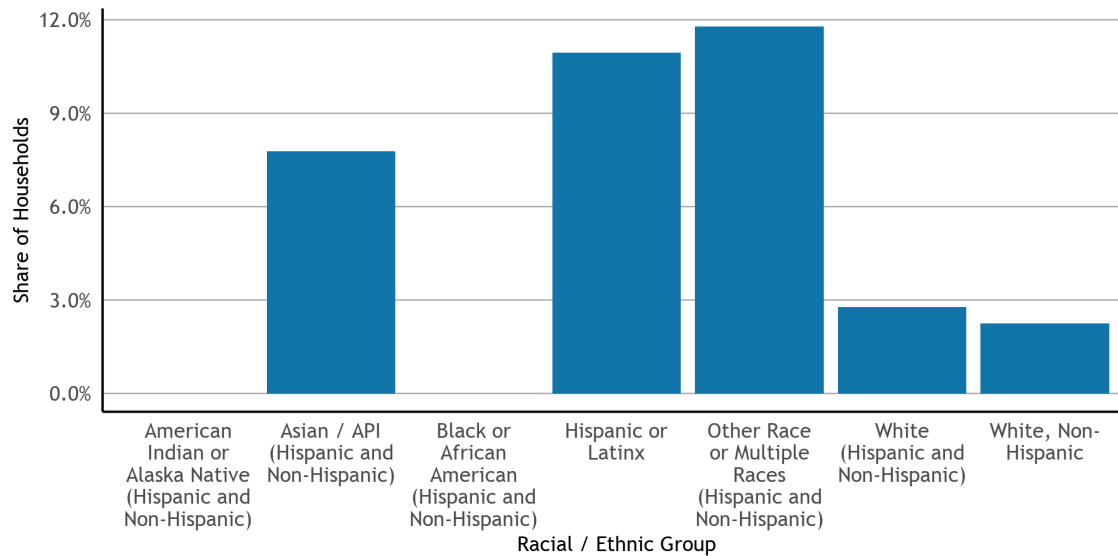
Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release.

For the data table behind this figure, please refer to the Data Packet Workbook, Table OVER-04.

Communities of color are more likely to experience overcrowding as well as poverty, financial instability, and housing insecurity. People of color tend to experience overcrowding at higher rates than White residents.

In Belmont, the racial group with the largest rate of overcrowding is *Other Race or Multiple Races (Hispanic and Non-Hispanic)* (see Figure 36).

Figure 36: Overcrowding by Race



Universe: Occupied housing units.

Notes: The Census Bureau defines an overcrowded unit as one occupied by 1.01 persons or more per room (excluding bathrooms and kitchens), and units with more than 1.5 persons per room are considered severely overcrowded. For this table, the Census Bureau does not disaggregate racial groups by Hispanic/Latinx ethnicity. However, data for the white racial group is also reported for white householders who are not Hispanic/Latinx. Since residents who identify as white and Hispanic/Latinx may have very different experiences within the housing market and the economy from those who identify as white and non-Hispanic/Latinx, data for multiple white sub-groups are reported here. The racial/ethnic groups reported in this table are not all mutually exclusive. Therefore, the data should not be summed as the sum exceeds the total number of occupied housing units for this jurisdiction. However, all groups labelled "Hispanic and Non-Hispanic" are mutually exclusive, and the sum of the data for these groups is equivalent to the total number of occupied housing units.

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25014. For the data table behind this figure, please refer to the Data Packet Workbook, Table OVER-03.

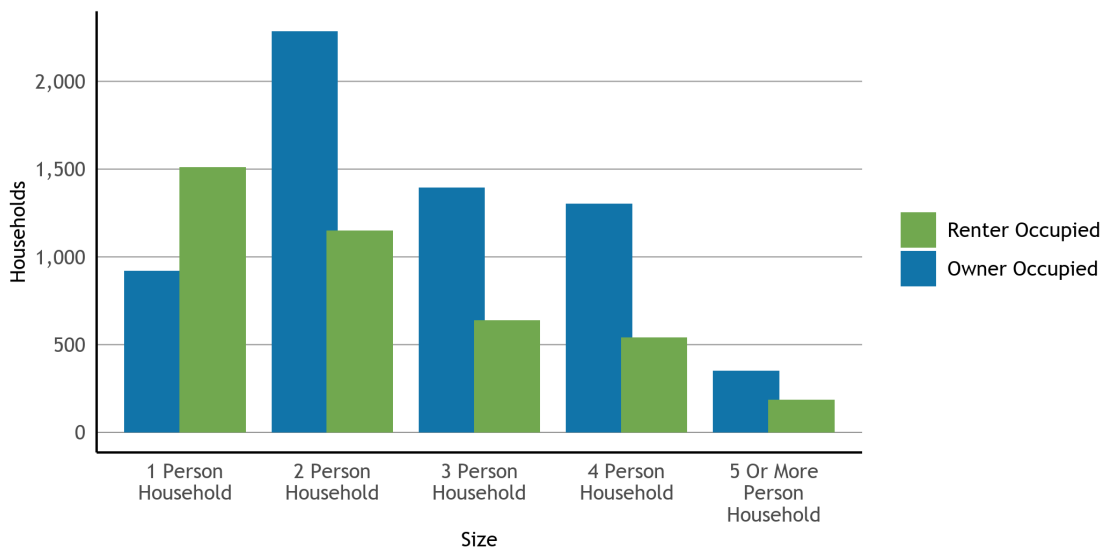
6. SPECIAL HOUSING NEEDS

6.1 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 that rent could end up living in overcrowded conditions.

In Belmont, for large households with five or more people, most units (65.2%) are owner-occupied (see Figure 37). In 2017, 13.8% of large households were very low-income, earning less than 50% of the area median income (AMI).

Figure 37: Household Size by Tenure



Universe: Occupied housing units.

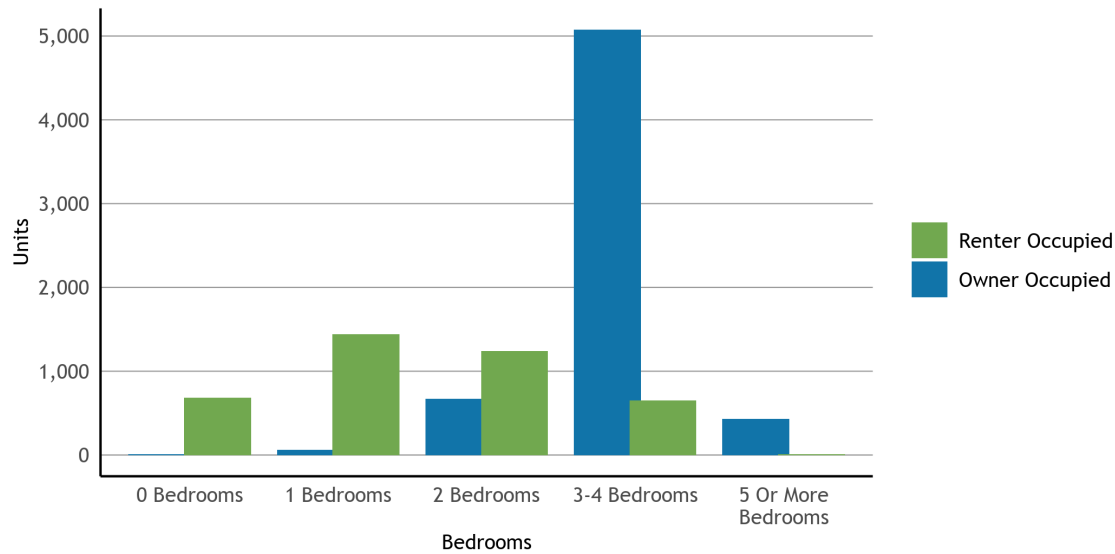
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25009.

For the data table behind this figure, please refer to the Data Packet Workbook, Table LGFEM-01.

In addition to overcrowding, large households also often have a cost burden. In Belmont, most large households paying too much for housing are lower-income households. Although this is principally because there are very few large renter households, there are disproportionately fewer large renter households than large owner-occupied households.

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 6,175 units in Belmont. Among these large units with three or more bedrooms, 10.8% are renter-occupied while 89.2% are owner occupied (see Figure 38).

Figure 38: Housing Units by Number of Bedrooms



Universe: Housing units.

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

For the data table behind this figure, please refer to the Data Packet Workbook, Table HSG-05.

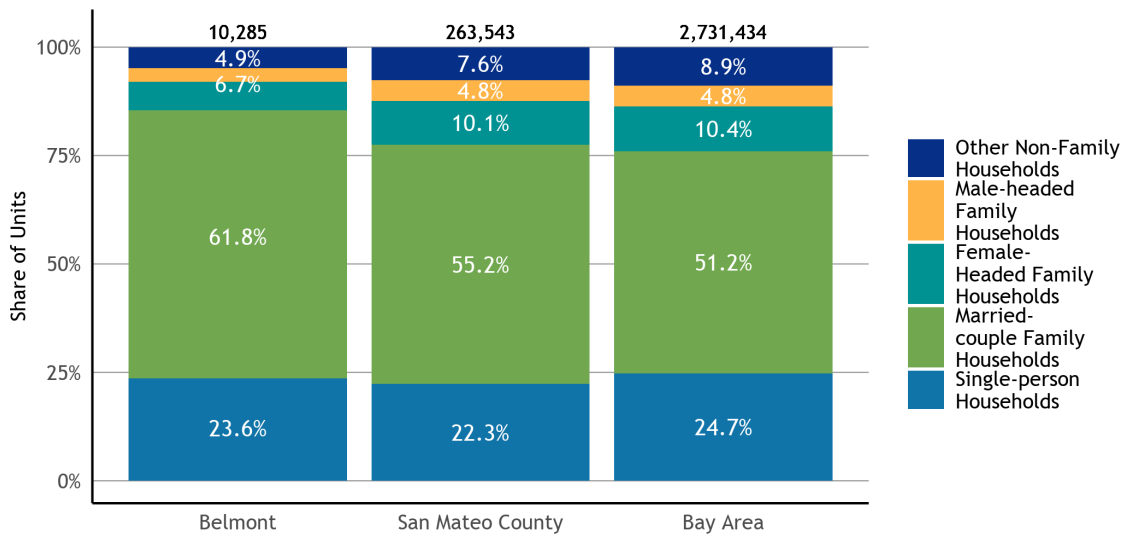
RESOURCES FOR LARGE HOUSEHOLDS

Finding rental housing with more than two bedrooms is a typical problem for large families, particularly renters with lower income levels. Of the approximately 6,175 housing units in Belmont with three or more bedrooms, only 10.8% (665) are occupied by renters. Due to the limited supply of adequately-sized rental units and affordable homeownership opportunities to accommodate large family households, large families face additional difficulty in locating housing that is adequately sized and affordably priced. While Belmont has a large proportion of housing units with three or more bedrooms, the issue is with mismatch between availability and affordability. The Housing Choice Voucher is one program that can assist very low-income large renter-households in accessing adequately sized housing.

6.2 FEMALE-HEADED HOUSEHOLDS

Households headed by one person are often at a greater risk of housing insecurity. This is particularly true of female-headed households, where the female may be supporting children or other family with a single income. In Belmont, the largest proportion of households is *Married-couple Family Households* (61.8%), while *Female-Headed Households* make up 6.7% of households.

Figure 39: Household Type



Universe: Households.

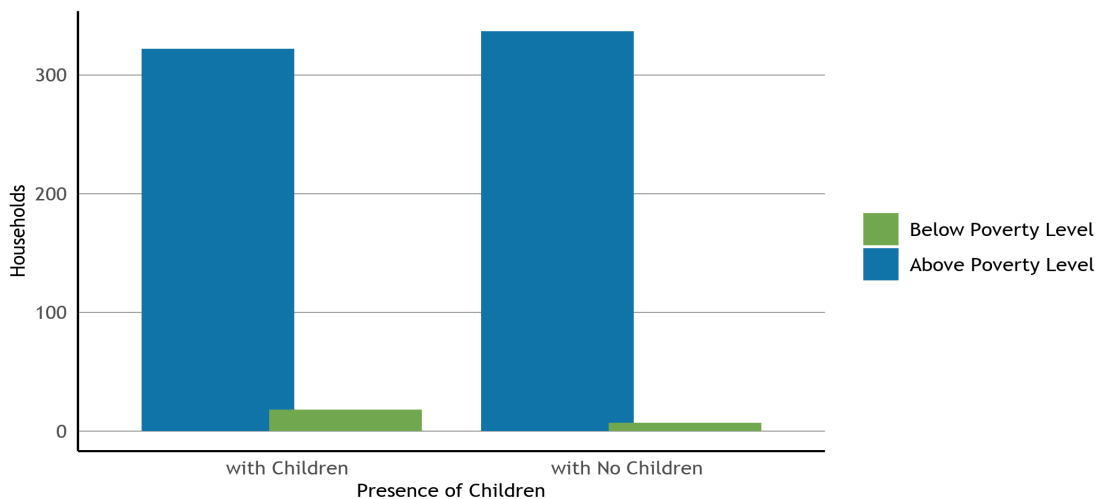
Notes: For data from the Census Bureau, a "family household" is a household where two or more people are related by birth, marriage, or adoption. "Non-family households" are households of one person living alone, as well as households where none of the people are related to each other.

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

For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-23.

Female-headed households with children may face elevated 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 Belmont, 5.3% of female-headed households with children fall below the Federal Poverty Line, while 2.0% of female-headed households without children live in poverty (see Figure 40).

Figure 40: Female-Headed Households by Poverty Status



Universe: Female households.

Notes: The Census Bureau uses a federally defined poverty threshold that remains constant throughout the country and does not correspond to Area Median Income.

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

For the data table behind this figure, please refer to the Data Packet Workbook, Table LGFEM-05.

The 2015-2019 American Community Survey showed that single parents comprised approximately 9.7% of Belmont households. Of these, the vast majority were female-headed, single-parent households (68.3% of single-parent households). Female-headed families have a higher incidence of poverty when compared to all households and are more likely renters than owners. Of the female headed households in Belmont, 57.6% were renters.

RESOURCES FOR SINGLE PARENT HOUSEHOLDS

Female-headed households often need affordable housing in areas suitable for child-rearing and with access to transit networks, schools, parks, and daily services. The City will also be looking at developing a policy for affirmative marketing to lower-income special needs groups, which may involve a preference system for below market rate (BMR) units to ensure special needs groups are given opportunities to access housing that is affordable to them.

6.3 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 reduced mobility.

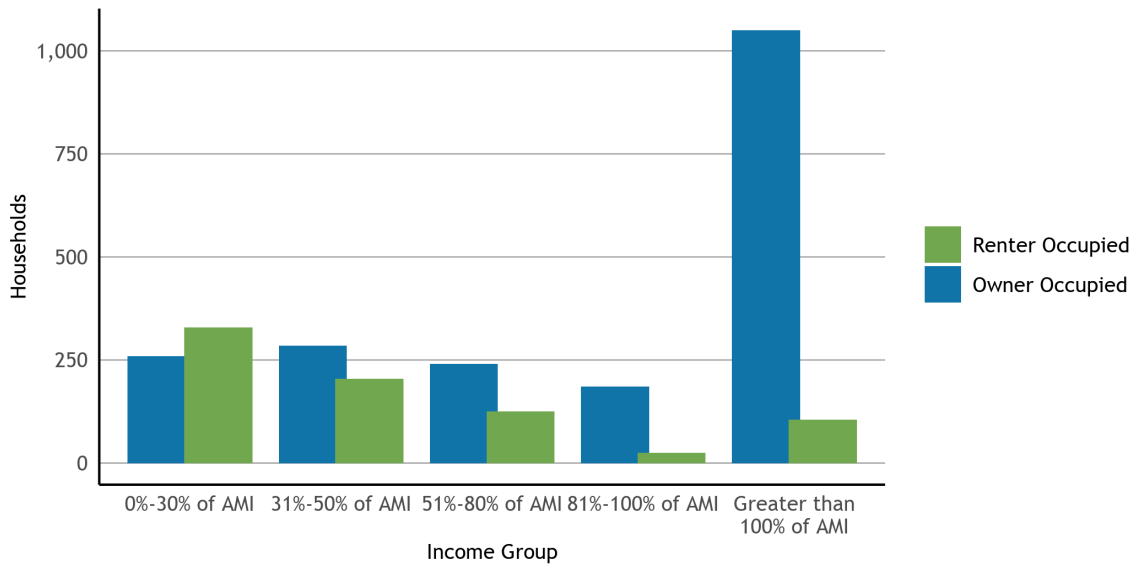
Seniors who rent may be at an even greater risk for housing challenges than those who own, due to income differences between these groups. The largest proportion of senior households who rent make 0%-30% of AMI, while the largest proportion of senior households who are homeowners falls in the income group *Greater than 100% of AMI* (see Figure 41).

According to American Community Survey 5-year data (2015-2019), of the approximately 10,285 households in Belmont, 2,809 or 27.3% are senior households. While many earn incomes over 100% of median income, a significant percentage earns lower incomes. Approximately 1,444 senior households earn incomes less than 80% of median, or about 51%. Of the lower-income households, 54.4% are homeowners and 45.6% are renters.

Cost burden is prevalent amongst elderly households, especially those earning the lowest incomes. For example, although extremely low-income senior households represent 21% of total senior households, they represent more than 49.5% of senior households with a cost burden. Of all senior households, 445 (15.8%) are cost-burdened, and 644 (22.9%) are severely cost-burdened.

Aside from overpayment problems faced by seniors due to their relatively fixed incomes, many seniors are faced with various disabilities. Among all disabilities, the most common are ambulatory disabilities (14.4%), independent living disabilities (10.5%), and hearing disabilities (9.4%).

Figure 41: Senior Households by Income and Tenure



Universe: Senior households.

Notes: For the purposes of this graph, senior households are those with a householder who is aged 62 or older. Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas, and the nine county Bay Area includes the following metropolitan areas: Napa Metro Area (Napa County), Oakland-Fremont Metro Area (Alameda and Contra Costa Counties), San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties), San Jose-Sunnyvale-Santa Clara Metro Area (Santa Clara County), Santa Rosa Metro Area (Sonoma County), and Vallejo-Fairfield Metro Area (Solano County). The AMI levels in this chart are based on the HUD metro area where this jurisdiction is located.

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

For the data table behind this figure, please refer to the Data Packet Workbook, Table SEN-01.

RESOURCES FOR SENIORS

Housing resources available for seniors include senior apartments and residential care facilities for the elderly (RCFE). Residential facilities such as assisted living or board and care facilities are non-medical facilities that provide a level of care that includes assistance with activities of daily living. RCFEs provide room, board, housekeeping, supervision, and personal care assistance with basic activities like personal hygiene, dressing, eating, and walking for persons 60 years and older. According to the State Department of Social Services (CDSS), Belmont has 297 beds in 11 licensed RCFEs.

In addition to funding programs that serve seniors, the County also provides information on a wide variety of services to seniors. These include, but are not limited to:

211 BAY AREA

211 provides free and confidential information and referrals. Call 2-1-1 for help with food, housing, employment, health care, counseling, and more. 211 in San Mateo County can help locate food, housing, health care, senior services, childcare, legal aid, and much more.

SAN MATEO COUNTY AGING AND ADULT SERVICES

San Mateo County Aging and Adult provides a wide range of services to keep seniors, people with disabilities, and dependent adults living safely and as independently as possible in the community.

SAN MATEO COUNTY NETWORK OF CARE

San Mateo County Network of Care is a website sponsored by San Mateo County and providing information on a wide array of services for seniors and persons with disabilities.

TIES (COUNTY OF BELMONT)

Phone Hotline 1-800-675-8437 Teamwork Insuring Elderly Support (T.I.E.S.) provides general information on all senior services. TIES features a 24-hour hotline and is designed to assist vulnerable elderly and dependent adults who need help but may be unable to get it for themselves.

HELP AT HOME

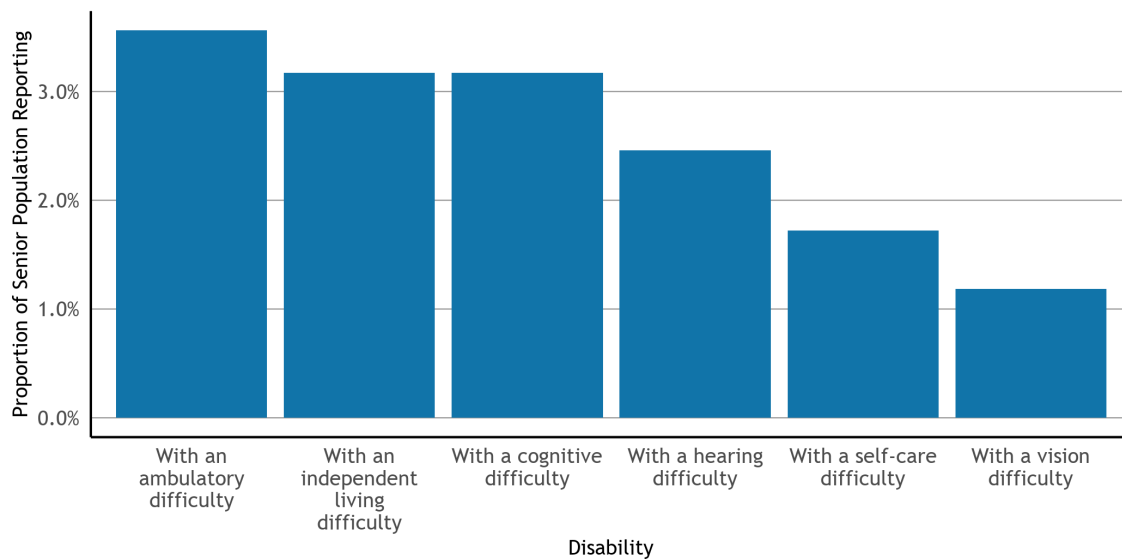
Help at Home is a mini-reference guide published by the San Mateo County Commission on Aging. This guide contains a wide variety of information designed to assist San Mateo County adults of all incomes to remain safely in their homes.

6.4 PEOPLE WITH DISABILITIES

People with disabilities face additional housing challenges. Encompassing a broad group of individuals living with a variety of physical, cognitive, and sensory impairments, many people with disabilities live on fixed incomes and need specialized care, yet often rely on family members for assistance due to the high cost of care.

When it comes to housing, people with disabilities are not only in need of affordable housing but accessibly designed housing, which offers greater mobility and opportunity for independence. Unfortunately, this need typically outweighs availability, particularly in a housing market with such high demand. People with disabilities are at a high risk for housing insecurity, homelessness, and institutionalization, particularly when they lose aging caregivers. Figure 42 shows the rates at which different disabilities are present among residents of Belmont. Overall, 9% of people in Belmont have a disability of any kind.²¹

²¹ 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 42: Disability by Type

Universe: Civilian noninstitutionalized population 18 years and over.

Notes: These disabilities are counted separately and are not mutually exclusive, as an individual may report more than one disability. These counts should not be summed. The Census Bureau provides the following definitions for these disability types: Hearing difficulty: deaf or has serious difficulty hearing. Vision difficulty: blind or has serious difficulty seeing even with glasses. Cognitive difficulty: has serious difficulty concentrating, remembering, or making decisions. Ambulatory difficulty: has serious difficulty walking or climbing stairs. Self-care difficulty: has difficulty dressing or bathing. Independent living difficulty: has difficulty doing errands alone such as visiting a doctor's office or shopping.

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B18102, Table B18103, Table B18104, Table B18105, Table B18106, Table B18107. For the data table behind this figure, please refer to the Data Packet Workbook, Table DISAB-01.

In Belmont and elsewhere, persons with disabilities have a wide range of different housing needs, which vary depending on the type and severity of the disability as well as personal preference and lifestyle. Physical, mental, and/or developmental disabilities may prevent a person from working, restrict one's mobility, or make it difficult to care for oneself. "Barrier-free design" housing, accessibility modifications, proximity to services and transit, and group living opportunities represent some of the types of considerations and accommodations that are important in serving this group. Also, some residents suffer from disabilities that require living in a supportive or institutional setting.

RESOURCES FOR PERSONS WITH DISABILITIES

In addition to housing and community development programs provided by the City, San Mateo County provides a variety of services and information for older adults and people with disabilities through its Network of Care efforts. Its website contains links to service providers on the following topics.

In addition, the Center for Independence of Individuals with Disabilities (CID) is a private, nonprofit corporation located in San Mateo, California. Incorporated in 1979, CID is a consumer-driven, community-based, services and advocacy organization serving San Mateo County and beyond. By federal mandate, the majority of its Staff, Management, and Board of Directors

consists of people with disabilities. Annually, CID provides direct and indirect services to more than 2,000 individuals with disabilities.

CID is one of 29 Independent Living Centers in the State of California and over 400 Independent Living Centers in the United States. It is affiliated with other ILCs through its membership and participation in the California Foundation of Independent Living Centers and the National Council of Independent Living. CID is affiliated with other nonprofit agencies through its membership in the California Association of Non-Profits.

CID services include Housing Accessibility Modification (HAM), which involves installing grab bars, rails, ramps, hand-held showers, etc. for low-income San Mateo County residents. It also provides Peer Counseling (individual and group) by licensed, trained persons with disabilities, and Financial Benefits Counseling (regarding applications or appeals for SSI, SSDI, or MediCal). The Assistive Technology (AT) Program is designed to educate and train the public concerning technology that can assist people with disabilities. CID maintains an information database of community resources and have links to the California statewide AT Network in Sacramento.

State law also requires Housing Elements examine the housing needs of people with developmental disabilities. People with developmental disabilities have a disability that emerged before age 18, is expected to be lifelong, and is of sufficient severity to require a coordinated program of services and support to live successfully in the community. Developmental disabilities include intellectual disability, autism, Down Syndrome, epilepsy, cerebral palsy, and other disabling conditions similar in their functional impact to an intellectual disability. Under California's Developmental Disabilities Services Act and the U.S. Supreme Court's 1999 decision in *Olmstead v. L.C.*, people with developmental disabilities are entitled to receive community-based services that allow them to live in the least restrictive community setting. This shift to de-institutionalization has led to the closure of the most restrictive segregated settings and to the requirement that local jurisdictions in their Housing Elements assess and plan specifically for the housing needs of people with developmental disabilities who receive services from the Regional Center to live in their home community.

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

The family home is the most prevalent living arrangement for Belmont's adults with developmental disabilities, with 35% of adults living in the family home in 2021, lower than the San Mateo County average of 56%. Belmont has a higher percentage of adults living in their own apartment than San Mateo County because of the presence of a 24-unit HUD 811 apartment complex specifically for people with developmental disabilities, which accounts for many of the adults with developmental disabilities now living independently.

In Belmont, of the population with a developmental disability, children under the age of 18 make up 31.1%, while adults account for 68.9%.

TABLE 13: POPULATION WITH DEVELOPMENTAL DISABILITIES BY AGE

Age Group	Number
Age 18+	111
Age Under 18	50

Universe: Population with developmental disabilities.

Notes: The California Department of Developmental Services is responsible for overseeing the coordination and delivery of services to more than 330,000 Californians with developmental disabilities including cerebral palsy, intellectual disability, Down syndrome, autism, epilepsy, and related conditions. The California Department of Developmental Services provides ZIP code level counts. To get jurisdiction-level estimates, ZIP code counts were cross-walked to jurisdictions using census block population counts from Census 2010 SF1 to determine the share of a ZIP code to assign to a given jurisdiction.

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

This table is included in the Data Packet Workbook as Table DISAB-04.

Access to deeply affordable rents coordinated with on-site supportive services provided by the Golden Gate Regional Center (such as found in Belmont’s single HUD 811 apartment property) is critical to helping Belmont adults with developmental disabilities remain stably housed in high-cost San Mateo County.

TABLE 14: POPULATION WITH DEVELOPMENTAL DISABILITIES BY RESIDENCE

Residence Type	Number
Home of Parent /Family /Guardian	88
Independent /Supported Living	35
Community Care Facility	29
Other	5
Foster /Family Home	5
Intermediate Care Facility	5

Universe: Population with developmental disabilities.

Notes: The California Department of Developmental Services is responsible for overseeing the coordination and delivery of services to more than 330,000 Californians with developmental disabilities including cerebral palsy, intellectual disability, Down syndrome, autism, epilepsy, and related conditions. The California Department of Developmental Services provides ZIP code level counts. To get jurisdiction-level estimates, ZIP code counts were cross-walked to jurisdictions using census block population counts from Census 2010 SF1 to determine the share of a ZIP code to assign to a given jurisdiction.

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

This table is included in the Data Packet Workbook as Table DISAB-05.

According to Housing Choices, a nonprofit organization that has supported people with developmental disabilities find and retain affordable housing in their communities for 25 years in San Mateo County, there are several statistics that have impacted the need for housing to support this population. These include the following.

Increase of Autism Diagnosis Reflected in Increase in Adults in their 20s and 30s. Growth in the Belmont adult population with developmental disabilities correlates with a significant

annual increase in the diagnosis of autism that began in the mid-1980s and did not level out until after 2015. The cumulative impact of this trend is already seen in the growth in the San Mateo County population age 18 to 41 with developmental disabilities.

TABLE 15: GROWTH IN POPULATION OF SAN MATEO COUNTY ADULTS WITH DEVELOPMENTAL DISABILITIES

Age Band	2015 Number	2021 Number	% Change
18 to 31	1,023	1,189	16%
32 to 41	397	457	15%
41 to 52	382	335	-12%
52 to 61	385	348	-10%
62 plus	327	435	33%
Total Adults	2,514	2,764	10%

Longer Life Spans. The California Department of Developmental Services reports that the number of San Mateo County residents with developmental disabilities age 62 and older grew by 33% between September 2015 and June 2021. With longer life expectancies, more adults with developmental disabilities will outlive their parents and family members who are the single largest source of housing for adults with developmental disabilities in Belmont. Longer life spans also slow the pace of resident turnover in the County’s shrinking supply of licensed care facilities, which further reduces opportunities for people with developmental disabilities to secure a space in a licensed care facility.

Decline in Licensed Care Facilities. The California Department of Developmental Services reports that between September 2015 and June 2021, San Mateo County lost 5% of its supply of licensed care facilities for people with developmental disabilities (including Community Care Facilities, Intermediate Care Facilities, and Skilled Nursing Facilities). The greatest contributing factor to this loss of supply is the high cost of housing making it more financially beneficial for retiring owners to sell the facilities as residences rather than as a business, thereby increasing the need for affordable housing options coordinated with supportive services funded by the Golden Gate Regional Center.

Displacement. The California Department of Developmental Services has documented a 12% decline in the age group 42 to 51 and a 10% decline in the age group 52 to 61 in San Mateo County between September 2015 and June 2021. Considering gains in life expectancy, this loss can reasonably be attributed to displacement from the County because of the lack of residential living options (either licensed facilities or affordable housing) when an elderly parent caregiver passes away or becomes unable to house and care for the adult. Displacement takes a particular toll on adults with developmental disabilities who depend on familiarity with transit routes, shopping, and services, as well as support from community-based services and informal networks built up over years of living in Belmont. In February 2022, the City of Belmont adopted a Housing Preference Policy that was structured to address housing displacement. The

preference policy offers priority for publicly funded affordable units to people who live or work in San Mateo County, and to people who have been displaced from a San Mateo County housing unit in the last three years.

Higher Rates of Physical Disabilities. People with developmental disabilities are more likely than the general population to have an accompanying physical disability. Twenty-seven percent (27%) of San Mateo County residents with developmental disabilities have limited mobility and 13% have a vision or hearing impairment. The need for an accessible unit coupled with the need for coordinated supportive services compounds the housing barriers faced by those with co-occurring intellectual and physical disabilities.

Ineligibility for Many Affordable Rental Units. Some adults with developmental disabilities depend on monthly income of around \$1,000 from the Supplemental Security Income (SSI) program, pricing them out of even the limited number of extremely low-income affordable housing units in Belmont. Those with employment tend to work part-time in the lowest paid jobs and struggle to income-qualify for many of the affordable housing units for rent in Belmont.

Transit-Dependent. Most adults with developmental disabilities do not drive or own a car and rely on public transit to integrate into the larger community.

RESOURCES FOR PERSONS WITH DEVELOPMENTAL DISABILITIES

Services for persons with disabilities are typically provided by both public and private agencies. State and Federal legislation regulate the accessibility and adaptability of new or rehabilitated multi-family apartment complexes to ensure accommodation for individuals with limited physical mobility. Housing options for persons with disabilities include various community care facilities. Many individuals continue to live with parents.

Housing Choices (HC) is a nonprofit that advocates for the housing needs of people with developmental disabilities. It is committed to educating local elected officials, City and County housing staff, and housing developers about the opportunity to plan for and include people with developmental and other disabilities in their local housing plans. It supports and promotes the voices of people with developmental and other disabilities and encourages them to become effective self-advocates. Along with clients, their parents, and other members of the community, HC frequently attends and testifies at City Council and other relevant meetings with the goal of creating cities and neighborhoods which are inclusive of people with developmental and other disabilities.

The single largest component of HC's work is helping individuals with developmental and other disabilities find housing that suits their specific needs and priorities. Every year, their Housing Coordinators help more than 1,800 people with developmental and other disabilities create a housing plan and apply for affordable housing.

Each client has unique housing needs, constraints, and preferences. When a person is referred to Housing Choices, a Housing Coordinator helps to create an individual housing plan with input

from the individual with disabilities and everyone in that person’s “Circle of Support.” Housing Coordinators help clients with their decision-making by discussing their finances, credit history, supportive service needs, household composition, and other background relevant to their housing choices. HC helps its clients identify and apply for rental properties for which they can income-qualify and that are in the right location. Depending on each person’s income and existing support network, this could involve applying for multiple waiting lists and monitoring waiting list statuses for several years.

The Golden Gate Regional Center (GGRC), noted above, provides services and support to individuals with developmental disabilities in Marin, San Francisco, and San Mateo Counties. A resident of Marin, San Francisco, or San Mateo Counties who falls into any of the following four categories is eligible for GGRC services.

- Is an individual with a developmental disability
- Is an infant or toddler (up to 36 months of age) who has a developmental delay
- Is an infant or toddler (up to 36 months of age) for whom there are established risk conditions that could lead to a developmental delay
- Is an infant or toddler (up to 36 months of age) at high risk of having a development disability due to a combination of biomedical factors

Individuals eligible under the first category are served by GGRC's Lanterman Act services program; infants and toddlers eligible under the latter three categories are served by the regional center's Early Start program.

There are several housing types appropriate for people living with a development disability: rent subsidized homes, licensed and unlicensed single-family homes, inclusionary housing, Section 8 vouchers, special programs for home purchase, HUD housing, and permanent supportive housing (PSH). The design of housing-accessibility modifications, the proximity to services and transit, and the availability of group living opportunities represent some of the types of considerations that are important in serving this need group. Incorporating “barrier-free” design in all, new multi-family housing (as required by California and Federal Fair Housing laws) is especially important to provide the widest range of choices for disabled residents. Special consideration should also be given to the affordability of housing, as people with disabilities may be living on a fixed income.

6.5 HOMELESSNESS

Homelessness remains an urgent challenge in many communities across the State, reflecting a range of social, economic, and psychological factors. Rising housing costs result in increased risks of community members experiencing homelessness. Far too many residents who have found themselves housing insecure have ended up unhoused or homeless in recent years, either temporarily or longer term. Addressing the specific housing needs for the unhoused population remains a priority throughout the region, particularly since homelessness is disproportionately

experienced by people of color, people with disabilities, those struggling with addiction, and those dealing with traumatic life circumstances.

The San Mateo County Human Services Agency (HSA), in close collaboration with community partners, conducts the bi-annual One Day Homeless Count and Survey (count). The purpose of the count is to gather and analyze information to help the community understand homelessness in the County. This is one data set, among others, which provides information for effective planning of services to assist people experiencing homelessness and people at risk of homelessness. HSA's Center on Homelessness and the San Mateo County Continuum of Care (CoC) Steering Committee are responsible for overseeing this data collection effort, with assistance from a broad group of community partners, including non-profit social service providers, city and town governments, and people who have former or current homelessness experiences.

The One Day Homeless Count and Survey (count) was designed to meet two related sets of data needs. The first is the requirement of the United States Department of Housing and Urban Development (HUD) that communities applying for McKinney-Vento Homelessness Assistance funds (i.e., Continuum of Care funds) must conduct a point-in-time count of homeless people a minimum of every two years. These counts are required to take place in the last ten days of January. The count was last conducted in January 2019 to meet this HUD requirement. The previous HUD-mandated count was conducted in January 2017. The second set of data needs is for local homeless system planning, as the count provides information about people experiencing homelessness and trends over time.

The 2019 count determined that there were 1,512 people experiencing homelessness in San Mateo County on the night of January 30, 2019. This comprised of the following.

- **901 unsheltered** homeless people (living on streets, in cars, in recreational vehicles (RVs), in tents/encampments), and
- **611 sheltered** homeless people (in emergency shelters and transitional housing programs).

This finding of 1,512 people was higher than the 2017 and 2015 counts, but lower than the 2011 and 2013 counts. The number of people living in shelters in 2019 remained similar to the number counted in 2017. The overall increase in homelessness from 2017 to 2019 was driven primarily by a significant increase in the number of people living in RVs (127% increase). There was also an increase in the number of people sleeping on the street (24% increase). However, compared to 2017, the 2019 count found a decrease in people estimated to be sleeping in cars (7% decrease) and in tents/encampments (31% decrease).

While no unsheltered families were directly observed during the 2019 count, the number of families with children experiencing unsheltered homelessness was estimated to have been 16 (in cars, tents/ encampments, and/or RVs). This number represents a 16% decrease in families from the 19 families estimated to be unsheltered in the 2017 count.

The count found seven unsheltered individuals in the City of Belmont. This was an increase from 2017, when one homeless individual was located, but lower than in 2013, when 43 people were counted. Although demographic data are not available for each individual jurisdiction, several key findings were made.

The 2019 One Day Homeless Count and Survey counted 1,018 households comprised of 1,110 single adults and 119 family households comprised of 401 adults and children.

A person in an adult only household was most likely to be unsheltered (75.5%), over 25 years old (95.1%), male (75.6%), non-Hispanic (64.9%), Caucasian (70.5%), and not experiencing chronic homelessness (71.4%). Family households were most likely to be in transitional housing (67.6%), have more children than adults (59.1% vs. 40.9% respectively), and be headed by a female (57.1%). People heading family households were also predominantly non-Hispanic (53.6%) and Caucasian (55.9%); however, race and ethnicity showed more variation in family households than adult only households.

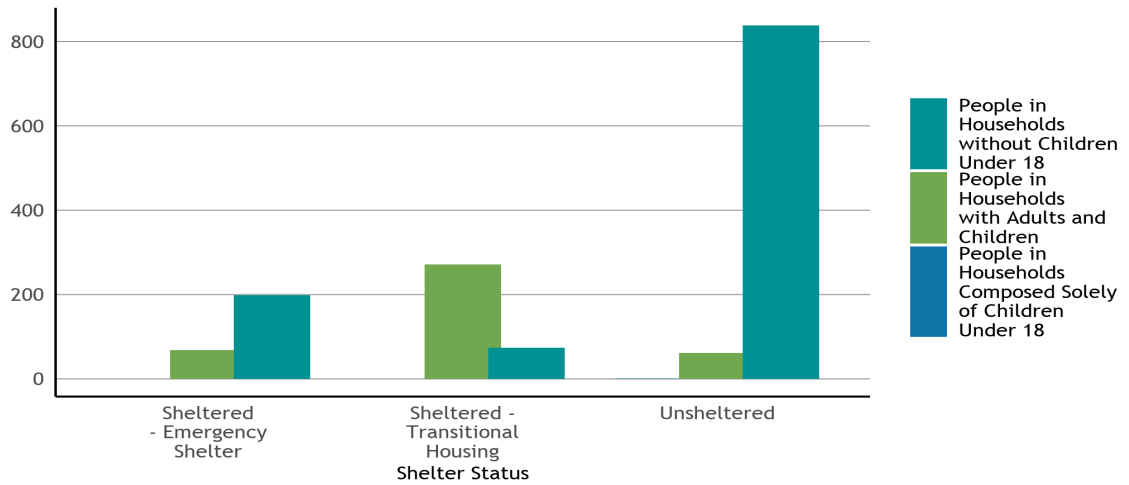
Furthermore, the percentage of people experiencing chronic homelessness over time increased from 19% in 2017 to 21% in 2019, but this figure was substantially lower than in 2013, when 45% were chronically homeless. In 2019, veterans represented 5% of adults, a reduction from 11% in 2017. Severe mental illness, alcohol and/or drug use, and history of domestic violence were some of the self-reported conditions of those who were counted. For more information, see <https://hsa.smcgov.org/2019-one-day-homeless-count>.

In San Mateo County, the most common type of household experiencing homelessness 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 43).

People of color are more likely to experience poverty and financial instability because 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 44).

Figure 43: Homelessness by Household Type and Shelter Status, San Mateo County



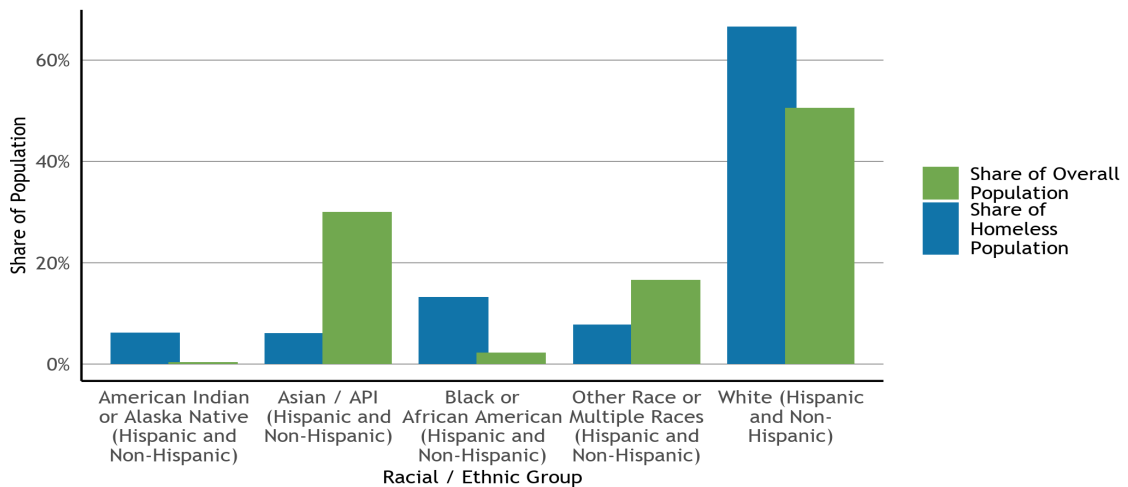
Universe: Population experiencing homelessness.

Notes: This data is based on Point-in-Time (PIT) information provided to HUD by CoCs in the application for CoC Homeless Assistance Programs. The PIT Count provides a count of sheltered and unsheltered homeless persons on a single night during the last ten days in January. Each Bay Area county is its own CoC, and so the data for this table is provided at the county-level. Per HCD's requirements, jurisdictions will need to supplement this county-level data with local estimates of people experiencing homelessness.

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

For the data table behind this figure, please refer to the Data Packet Workbook, Table HOMEELS-01.

Figure 44: Racial Group Share of General and Homeless Populations, San Mateo County



Universe: Population experiencing homelessness.

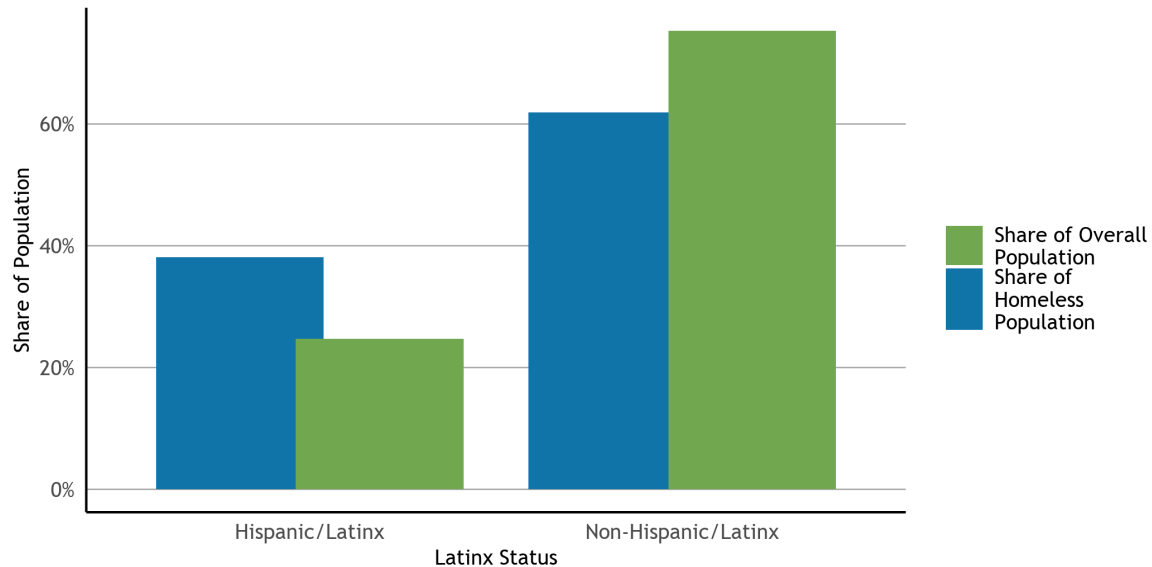
Notes: This data is based on Point-in-Time (PIT) information provided to HUD by CoCs in the application for CoC Homeless Assistance Programs. The PIT Count provides a count of sheltered and unsheltered homeless persons on a single night during the last ten days in January. Each Bay Area county is its own CoC, and so the data for this table is provided at the county-level. Per HCD's requirements, jurisdictions will need to supplement this county-level data with local estimates of people experiencing homelessness. HUD does not disaggregate racial demographic data by Hispanic/Latinx ethnicity for people experiencing homelessness. Instead, HUD reports data on Hispanic/Latinx ethnicity for people experiencing homelessness in a separate table. Accordingly, the racial group data listed here includes both Hispanic/Latinx and non-Hispanic/Latinx individuals.

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

For the data table behind this figure, please refer to the Data Packet Workbook, Table HOMEELS-02.

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 45).

Figure 45: Latinx Share of General and Homeless Populations, San Mateo County



Universe: Population experiencing homelessness.

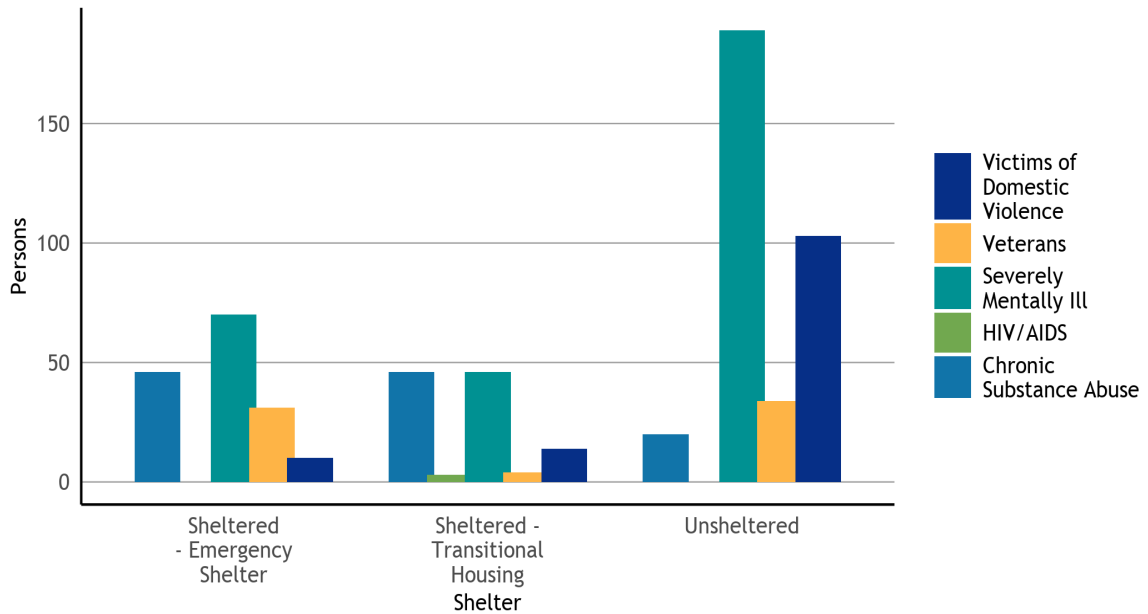
Notes: This data is based on Point-in-Time (PIT) information provided to HUD by CoCs in the application for CoC Homeless Assistance Programs. The PIT Count provides a count of sheltered and unsheltered homeless persons on a single night during the last ten days in January. Each Bay Area county is its own CoC, and so the data for this table is provided at the county-level. Per HCD’s requirements, jurisdictions will need to supplement this county-level data with local estimates of people experiencing homelessness. The data from HUD on Hispanic/Latinx ethnicity for individuals experiencing homelessness does not specify racial group identity. Accordingly, individuals in either ethnic group identity category (Hispanic/Latinx or non-Hispanic/Latinx) could be of any racial background.

Source: U.S. Department of Housing and Urban Development (HUD), Continuum of Care (CoC) Homeless Populations and Subpopulations Reports (2019); U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B01001(A-I). For the data table behind this figure, please refer to the Data Packet Workbook, Table HOMEELS-03.

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

In Belmont, the student population experiencing homelessness totaled 17 during the 2019-20 school year and none in 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 same period. During the 2019-20 school year, there were still approximately 13,718 students experiencing homelessness in the region, adding undue burdens on learning and thriving, with the potential for longer-term negative effects. The number of students in Belmont experiencing homelessness in 2019 represented 1.4% of the San Mateo County total and 0.1% of the Bay Area total.

Figure 46: Characteristics for the Population Experiencing Homelessness, San Mateo County



Universe: Population experiencing homelessness.

Notes: This data is based on Point-in-Time (PIT) information provided to HUD by CoCs in the application for CoC Homeless Assistance Programs. The PIT Count provides a count of sheltered and unsheltered homeless persons on a single night during the last ten days in January. Each Bay Area county is its own CoC, and so the data for this table is provided at the county-level. Per HCD's requirements, jurisdictions will need to supplement this county-level data with local estimates of people experiencing homelessness. These challenges/characteristics are counted separately and are not mutually exclusive, as an individual may report more than one challenge/characteristic. These counts should not be summed.

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

For the data table behind this figure, please refer to the Data Packet Workbook, Table HOMEELS-04.

TABLE 16: STUDENTS IN LOCAL PUBLIC SCHOOLS EXPERIENCING HOMELESSNESS

Academic Year	Belmont	San Mateo County	Bay Area
2016-17	0	1,910	14,990
2017-18	15	1,337	15,142
2018-19	23	1,934	15,427
2019-20	17	1,194	13,718

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

Notes: The California Department of Education considers students to be homeless if they are unsheltered, living in temporary shelters for people experiencing homelessness, living in hotels/motels, or temporarily doubled up and sharing the housing of other persons due to the loss of housing or economic hardship. The data used for this table was obtained at the school site level, matched to a file containing school locations, geocoded and assigned to jurisdiction, and finally summarized by geography.

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).

This table is included in the Data Packet Workbook as Table HOMEELS-05.

RESOURCES FOR PERSONS EXPERIENCING HOMELESSNESS

The County of San Mateo is the primary coordinator of services for people experiencing homelessness in the County. The City of Belmont will continue to provide support for strategic initiatives to help address the challenges faced by people experiencing homelessness in the City, as well as to support the implementation of the County's 2022-2025 Continuum of Care (COC) Strategic Plan on Homelessness.

The City continues to support the work of non-profit organizations providing housing services, including homeless prevention, supportive and emergency housing, and other services identified as priority needs through the community engagement process. The COC guides the implementation of the County's housing and service system to meet the needs of homeless individuals and families. The City of Belmont participates in COC meetings and monitors decision-making to better understand the latest trends in homeless outreach. The COC coordinates the following activities.

- System planning (identifying gaps, developing strategies to fill gaps, responding to emerging best practices, etc.).
- Setting funding priorities for Emergency Solutions Grant and COC funds.
- Assessing system performance and making system redesigns as needed.
- Coordinating with other planning entities such as the Community Action Agency.
- Undertakes a wide range of efforts to meet the needs of homeless individuals and families.

CHRONICALLY HOMELESS

COC has created a multi-disciplinary, bilingual, Homeless Outreach Team (HOT) to conduct intensive outreach and engagement with unsheltered and chronically homeless individuals and families located throughout the County, with specialized HOT teams in the Cities of Belmont, Redwood City, South San Francisco, Half Moon Bay, Pacifica, and East Palo Alto.

FAMILIES WITH CHILDREN

To reduce the number of unsheltered families, the COC has developed a rapid re-housing program. The San Mateo County Human Services Agency has provided funding for a motel voucher program to assist families with children who are waiting to access shelter.

VETERANS

Needs include housing and assistance for the homeless, employment and education services, and improved and increased liaisons with the Veterans Benefits Administration.

YOUTH

Currently, HUD COC funds are provided to the San Mateo County Mental Health Association to operate its Support and Advocacy for Young Adults in Transition Program, which provides case management and housing search/stabilization services to homeless youth. The San Mateo County Housing Authority administers the Family Unification Program vouchers.

6.6 FARMWORKERS

Farmworkers are traditionally defined as persons whose primary incomes are earned through seasonal or permanent agricultural work. Farmworkers have special housing needs because they earn lower incomes than many other workers. In many parts of Northern California, agriculture production is an important contribution to local economies, especially in Napa and Sonoma Counties.

In Belmont, there are no known farmworkers, and it does not have any farm housing or land remaining in agricultural use. Furthermore, no land within Belmont is designated for agricultural use. According to American Community Survey's 2019 five-year data, there could be an estimated 30 farmworkers in Belmont; however, the margin of error for this figure is +/- 42, indicating this information is unreliable. Even at 30 farmworkers, this represents only 0.1% of the total population in the City. Maps from the State of California Department of Conservation Farmland Mapping and Monitoring Program show no farmland in Belmont. Due to the low number of potential agricultural workers in the City, the housing needs of migrant and/or farmworker housing need can be met through general affordable housing programs.

As there are no known farmworkers in Belmont, there were no reported students of migrant workers in the 2019-20 school year. The trend for the region for the past few years has been a decline of 2.4% in the number of migrant worker students since the 2016-17 school year. The change at the county level is a 57.1% decrease in the number of migrant worker students since the 2016-17 school year.

TABLE 17: MIGRANT WORKER STUDENT POPULATION

Academic Year	Belmont	San Mateo County	Bay Area
2016-17	0	657	4,630
2017-18	0	418	4,607
2018-19	0	307	4,075
2019-20	0	282	3,976

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

Notes: The data used for this table was obtained at the school site level, matched to a file containing school locations, geocoded and assigned to jurisdiction, and finally summarized by geography.

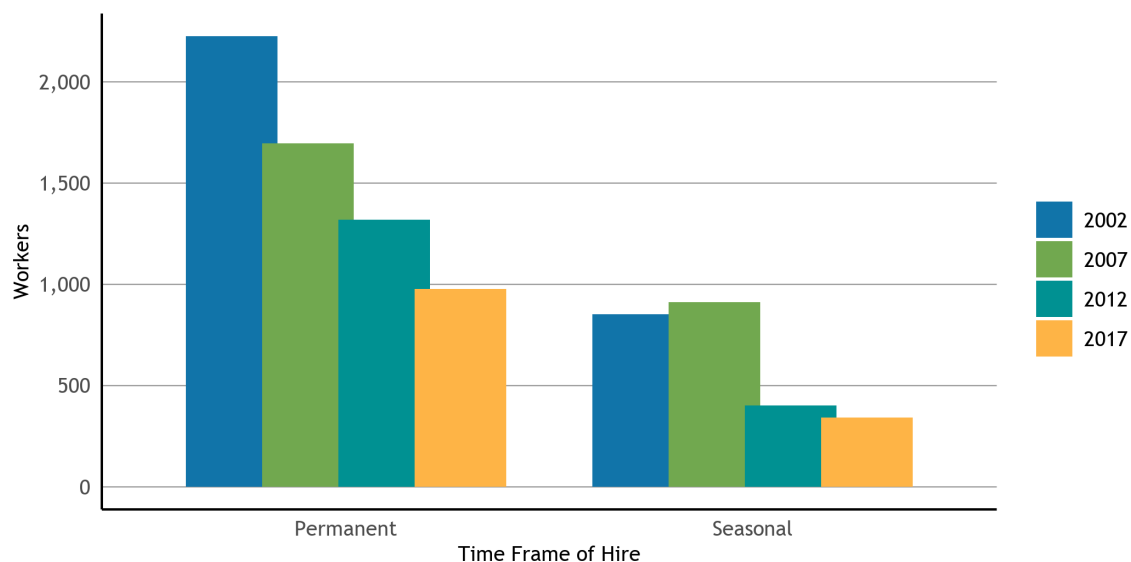
Source: California Department of Education, California Longitudinal Pupil Achievement Data System (CALPADS), Cumulative Enrollment Data (Academic Years 2016-2017, 2017-2018, 2018-2019, 2019-2020). See Table FARM-01.

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 also decreased, totaling 343 in 2017 (see Figure 47).

RESOURCES FOR MIGRANT AND/OR FARM WORKERS

As mentioned above, there are no known persons employed in the farming, fishing, and forestry occupations. As such, no special programs target this population in Belmont, but they can be generally assisted with Housing Choice Vouchers or other affordable housing resources.

Figure 47: Farm Operations and Farm Labor by County, San Mateo County



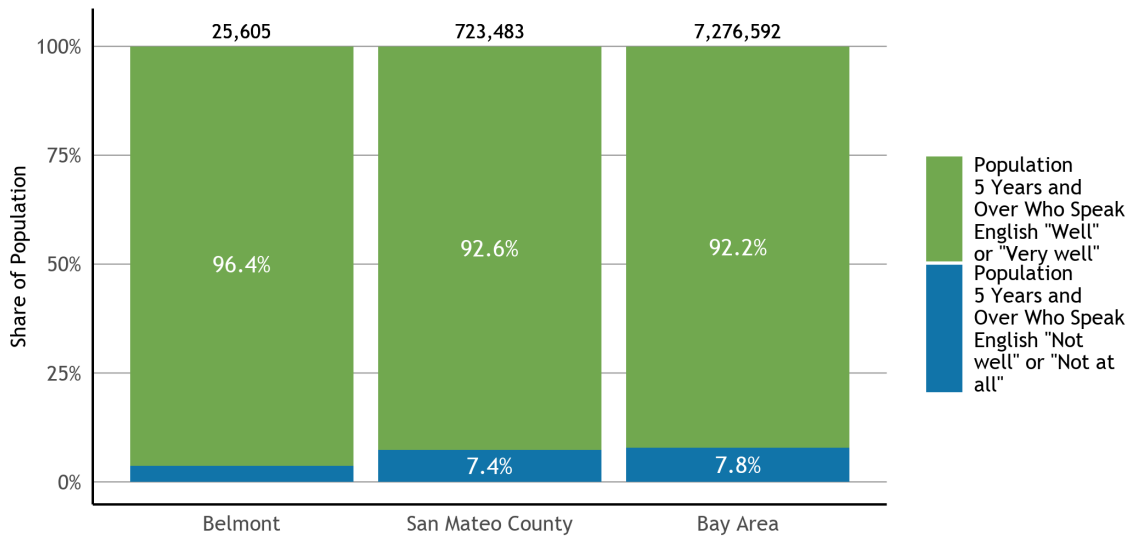
*Universe: Hired farm workers (including direct hires and agricultural service workers who are often hired through labor contractors).
 Notes: Farm workers are considered seasonal if they work on a farm less than 150 days in a year, while farm workers who work on a farm more than 150 days are considered to be permanent workers for that farm.
 Source: U.S. Department of Agriculture, Census of Farmworkers (2002, 2007, 2012, 2017), Table 7: Hired Farm Labor.
 For the data table behind this figure, please refer to the Data Packet Workbook, Table FARM-02.*

6.7 NON-ENGLISH SPEAKERS

California has long been an immigration gateway to the U.S., which means 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 U.S. to have limited English proficiency. This limit can lead to additional disparities if there is a disruption in housing, such as an eviction, because residents might not be aware of their rights, or they might be wary to engage due to immigration status concerns.

In Belmont, 3.6% of residents five years and older identify as speaking English “not well” or “not at all,” which is below the percentage in San Mateo County. Throughout the region, the proportion of residents five years and older with limited English proficiency is 8% (Figure 48).

Figure 48: Population with Limited English Proficiency



Universe: Population 5 years and over.

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

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

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APPENDIX C: AFFH

AFFH Attachment C.1.

City of Belmont Fair Housing Assessment

What is AFFH?

The State of California's 2018 Assembly Bill (AB 686) requires that all public agencies in the state affirmatively further fair housing (AFFH) beginning January 1, 2019. Public agencies receiving funding from the U.S. Department of Housing and Urban Development (HUD) are also required to demonstrate their commitment to AFFH. The federal obligation stems from the fair housing component of the federal Civil Rights Act mandating federal fund recipients to take "meaningful actions" to address segregation and related barriers to fair housing choice.

AB 686 requires all public agencies to "administer programs and activities relating to housing and community development in a manner that affirmatively furthers fair housing and take no action inconsistent with this obligation."¹

AB 686 also makes changes to Housing Element Law to incorporate requirements to AFFH as part of the housing element and general plan to include an analysis of fair housing outreach and capacity, integration and segregation, access to opportunity, disparate housing needs, and current fair housing practices.

Affirmatively Furthering Fair Housing

"Affirmatively furthering fair housing" means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Taken together, these actions should address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. The duty to affirmatively further fair housing extends to all of a public agency's activities and programs relating to housing and community development. (Gov Code, § 8899.50, subd. (a)(1).)"

Source: California Department of Housing and Community Development Guidance, 2021, page 14.

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 live near similar people).

Researcher Richard Rothstein's 2017 book *The Color of Law: A Forgotten History of How Our Government Segregated America* chronicles how the public sector contributed to the segregation that exists today. Rothstein highlights several significant developments in the Bay Area region that played a large role in where the region's non-White residents settled.

Pre-civil rights San Mateo County faced resistance to racial integration, yet it was reportedly less direct than in some Northern California communities, taking the form of “blockbusting” and “steering” or intervention by public officials. These local discriminatory practices were exacerbated by actions of the Federal Housing Administration which excluded low-income neighborhoods, where the majority of people of color lived, from its mortgage loan program.

According to the San Mateo County Historical Association, San Mateo County's early African Americans worked in a variety of industries, from logging, to agriculture, to restaurants and entertainment. Expansion of jobs, particularly related to shipbuilding during and after World War II attracted many new residents into the Peninsula, including the first sizable migration of African Americans. Enforcement of racial covenants after the war forced the migration of the county's African Americans into neighborhoods where they were allowed to occupy housing—housing segregated into less desirable areas, next to highways, and concentrated in public housing and urban renewal developments.

The 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 re-integration by refusing to insure mortgages held by White buyers residing in East Palo Alto.

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.

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's also necessary to recognize the historical impacts of colonization and genocide on Indigenous populations and how the effects of those atrocities are still being felt today. The original inhabitants of present-day San Mateo County are the Ramaytush Ohlone, who have "...lived on the San Francisco Peninsula for thousands of years and continue to live here as respectful stewards of the land."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 timeline of major federal Acts and court decisions related to fair housing choice and zoning and land use appears on the following page.

As shown in the timeline, exclusive zoning practices were common in the early 1900s. Courts struck down only the most discriminatory and allowed those that would be considered today to have a "disparate impact" on classes protected by the Fair Housing Act. For example, the 1926 case *Village of Euclid versus 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, multi-family apartments were the only housing options for people of color, including immigrants.

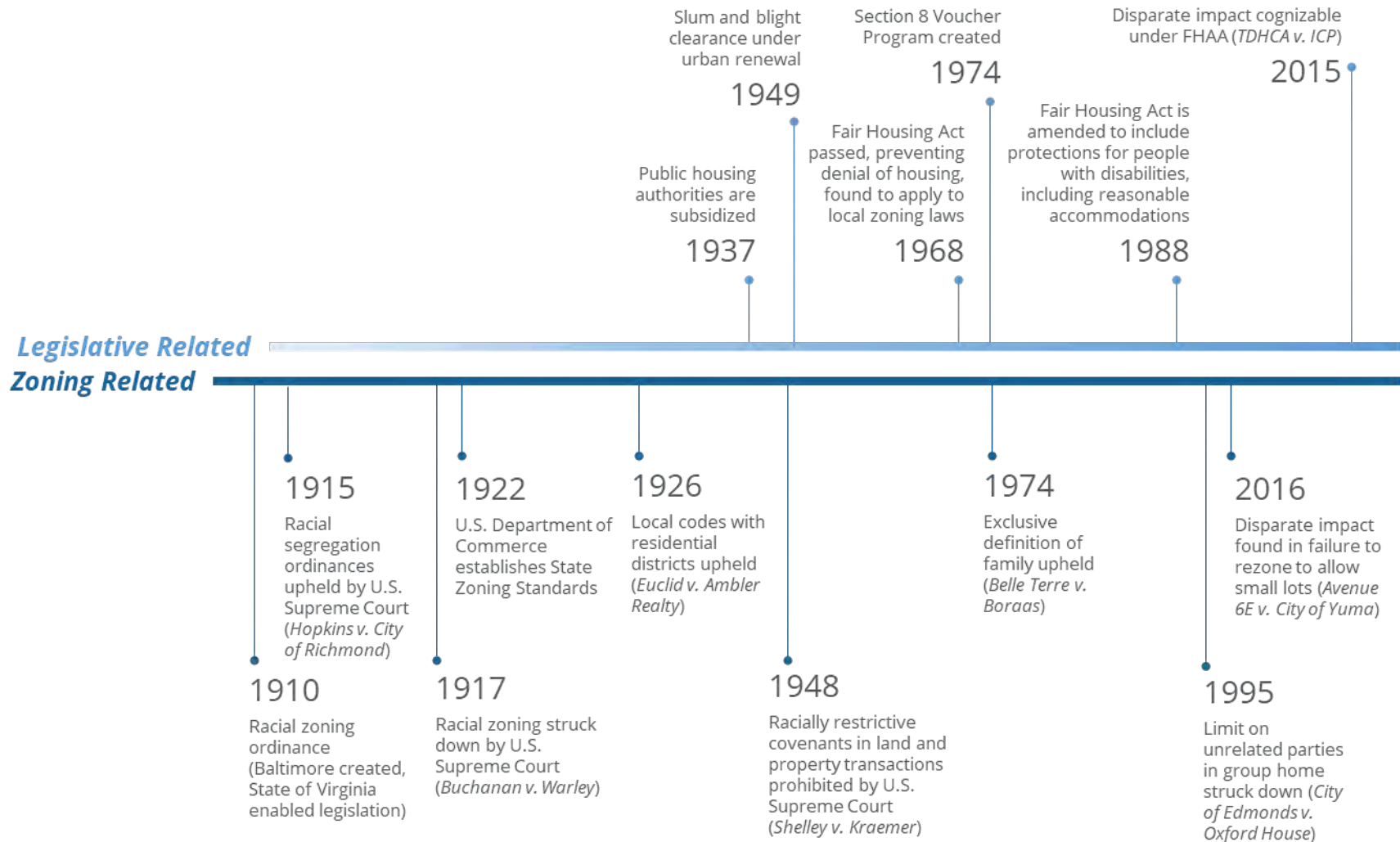
The Federal Fair Housing Act was not enacted until nearly 60 years after the first racial zoning ordinances appeared in U.S. cities. This coincided with a shift away from federal control over low-income housing toward locally-tailored approaches (block grants) and market-oriented choice (Section 8 subsidies)—the latter of which is only effective when adequate affordable rental units are available.

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/>

Major Public and Legal Actions that Influence Fair Access to Housing



Report Content and Organization

This Fair Housing Assessment follows the April 2021 State of California State Guidance for AFFH. The study was conducted as part of the 21 Elements process, which facilitates the completion of Housing Elements for all San Mateo County jurisdictions. The figures that are referenced throughout this section are contained in Attachment C.4 Belmont AFFH Segregation Report and Attachment C.6 Maps and Data Packet. This supplemental attachment includes data tables comparing the jurisdiction to the county and broader region, in addition to HCD maps created to support the AFFH.

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

Section II. Integration and Segregation identifies areas of concentrated segregation, degrees of segregation, and the groups that experience the highest levels of segregation.

Section III. Access to Opportunity examines differences in access to education, transportation, economic development, and healthy environments.

Section IV. Disproportionate Housing Needs identifies which groups have disproportionate housing needs including displacement risk.

Section V. AFFH Sites Inventory Analysis. AB 686 required analysis of sites identified to meet RHNA obligations for their ability to affirmatively further fair housing.

Section VI. Contributing Factors and Fair Housing Action Plan. Goals and Actions designed to address fair housing issues and contributing factors.

AFFH Attachments:

- C.2. AFFH Community Engagement - Resident survey results—findings from a survey of Belmont residents on their experience finding and remaining in housing, with comparisons to the experience of county residents overall.
- C.3. Disparate Access to Education Opportunities—findings from a countywide analysis of access to education and educational outcomes by protected class.
- C.4. Belmont AFFH Segregation Report—Prepared by UC Merced Urban Policy Lab and ABAG/MTC Staff, describes racial and income segregation in Bay Area jurisdictions.
- C.5. State Fair Housing Laws and Regulations—a summary of key State laws and regulations related to mitigating housing discrimination and expanding housing choice.

- C.6. Belmont Maps and Data Packet—This supplemental attachment includes data tables comparing the jurisdiction to the county and broader region, in addition to HCD maps created to support the AFFH.

Primary Findings

- **Nine fair housing inquiries and two fair housing complaints were made by Belmont residents between 2017 and 2021.** A complaint filed in 2017 concerned refusal to rent based on national origin; it was settled through a conciliation agreement. A 2021 complaint based on disability for failure to provide reasonable accommodations was withdrawn by the complainant.
- Fifty-four (54%) percent of Belmont’s population is non-Hispanic White; 28% is Asian; 12% is Hispanic/Latinx; and 4% is other races or mixed race. **Belmont has proportionately fewer residents of color than in the county and the Bay area overall**, although the city’s Asian population is on par with the proportion in the county and Bay area. Belmont has grown more racially and ethnically diverse since 2000 and 2010, largely due to growth in Asian residents (mostly occurring between 2010 and 2020) and a slight increase in Hispanic/Latinx residents (mostly between 2000 and 2010).
- **Racial and ethnic minority populations in Belmont**—with the exception of Asians—**are more likely to be living in poverty and be housing cost burdened** compared to the non-Hispanic White population. They are also slightly **more likely to be denied a mortgage loan**. On the positive side, residents living in Belmont—regardless of race and ethnicity—**have strong access to highly resourced neighborhoods**.
- Although **Asian residents** are less likely than other residents to experience cost burden, they have **relatively high rates of overcrowding**, suggesting that some are doubling up to afford to live in Belmont.
 - One-third of non-Hispanic White households are cost burdened, with 15% severely cost burdened. Only 2.8% live in overcrowded conditions.
 - One-quarter of Asian households are cost burdened with only 9% severely burdened. Yet 7.8% live in overcrowded conditions.
 - Hispanic/Latinx households have much higher rates of cost burden—48% are burdened and 25% severely burdened—and one in ten lives in an overcrowded household.
 - **Nearly all of Belmont’s households earning 30% of AMI and less are burdened**, with the vast majority severely burdened (Figure IV-10, Attachment C.6). The level of burden diminishes greatly once households earn 80% of AMI and more.
- According to TCAC’s educational opportunity map, **all census tracts in Belmont have schools with the most positive educational outcomes**. Belmont offers a strong

educational environment citywide. Students with disabilities in the Belmont-Redwood Shores district do comparatively well.

- **Educational outcomes vary for some racial and ethnic groups**, and the school district could improve proficiency gaps and differences in suspension rates. Specifically,
 - 82% of students in Belmont’s district meet or exceed English language arts and literacy standards; 79% exceed math standards; both are higher than the county overall. These outcomes are much lower for some students of color: 44% of Black or African American students and 64% of Hispanic students meet or exceed state English language arts standards, and 37% of Black or African American students and 52% of Hispanic students meet or exceed state math standards.
 - **Suspensions are disproportionately high for Hispanic students.** Hispanic students make up 34% of the high school district student body yet account for 66% of suspensions.
- **Belmont’s largest challenge lies in housing affordability.** In two census tracts, between 40% and 60% of renter households face housing burden. Yet compared to surrounding cities, Belmont offers better rental affordability, according to the HCD Location Affordability Index (Figure IV-29, Attachment C.6). Just 18% of Belmont’s owner-occupied units are priced below \$1 million, compared to 44% for the county and 65% for the Bay area overall.
- **Belmont has not kept up with demand for new housing.** The number of homes in Belmont increased by .6% from 2010 to 2020, below the growth rate for San Mateo County and the region’s housing stock. Between 2010 and 2020, Belmont built more single family than multifamily homes, and the city’s share of housing stock comprised of single family detached homes is above that of other jurisdictions in the region.⁵
- Nine percent (9%) of Belmont’s residents have a disability, which is on par with the county and the Bay area overall.
- **Belmont does not currently have a pattern of segregation or clustering based on race unlike nearby cities.** The Racial Dot Map (Figure 1, Attachment C.4) provides a visual demonstration of the spatial distribution of residents based on race in Belmont while Figure 5 (Attachment C.4) includes the surrounding area for context.
- **Geospatially, lower-income residents are distributed throughout the City, without strong patterns of clustering.** The Income Dot Map (Figure 8, Attachment C.4) shows that Belmont has a distribution of all income groups with a slight concentration of above-moderate income residents in the northwest portion of the City.

⁵ Housing Needs Data Report completed by ABAG/MTC staff and Baird + Driskell Planning.

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 from hate violence and human trafficking in accordance with the Fair Employment and Housing Act (FEHA), Unruh Civil Rights Act, Disabled Persons Act, and Ralph Civil Rights Act".⁶

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.⁷ Fair housing complaints can also be submitted to HUD for investigation.

Additionally, San Mateo County has a number of **local enforcement organizations** including Project Sentinel, the Legal Aid Society of San Mateo County, and Community Legal Services of East Palo Alto. These organizations receive funding from the County and participating jurisdictions to support fair housing enforcement and outreach and education in the County.

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). Of these, two (3.5%) of complaints -- were in Belmont. Countywide, most complaints cited disability status as the bias (56%), followed by race (19%), and familial status (14%). In Belmont, the complaints alleged discrimination in the terms and conditions for renting and discriminatory refusal to rent.

⁶ <https://www.dfeh.ca.gov/aboutdfeh/>

⁷ <https://www.dfeh.ca.gov/complaintprocess/>

Countywide, no cause determination was found in 27 complaints followed by successful conciliation or settlement with 22 complaints. In Belmont, one of the complaints was withdrawn by the complainant and the other was successfully settled. Fair housing inquiries in 2020 were primarily submitted from the City of San Mateo, Redwood City, Daly City, and Menlo Park.

Fair housing complaints filed with HUD by San Mateo County residents have been on a declining trend since 2018, when 18 complaints were filed. In 2019, complaints dropped to 5, increased to 11 in 2020, and had reached 6 by mid-2021.

Nationally, the National Fair Housing Alliance (NFHA) reported a “negligible” decrease in the number of complaints filed between 2019 and 2020. The primary bases for complaints nationally were nearly identical to San Mateo County’s: disability (55%) and race (17%). 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—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.⁸ Although discrimination complaints in San Mateo County have progressively declined, findings from the 21 Elements Resident Survey suggest that residents still experience housing discrimination but do not report it. For the county overall, 19% of respondents felt they were discriminated against when looking for housing—this is highest among African American residents (62%), single parent households (44%), and precariously housed residents (39%). Households with incomes above \$100,000 are least likely to experience housing discrimination—for example, only 11% of households in this income group reported housing discrimination. Rates of discrimination for the county are lower than respondents living in Belmont where 21% thought they had experienced discrimination (this is elaborated upon below).

⁸ <https://nationalfairhousing.org/2021/07/29/annual-fair-housing-report-shows-increase-in-housing-harassment/>

Fair Housing Complaints and Inquiries

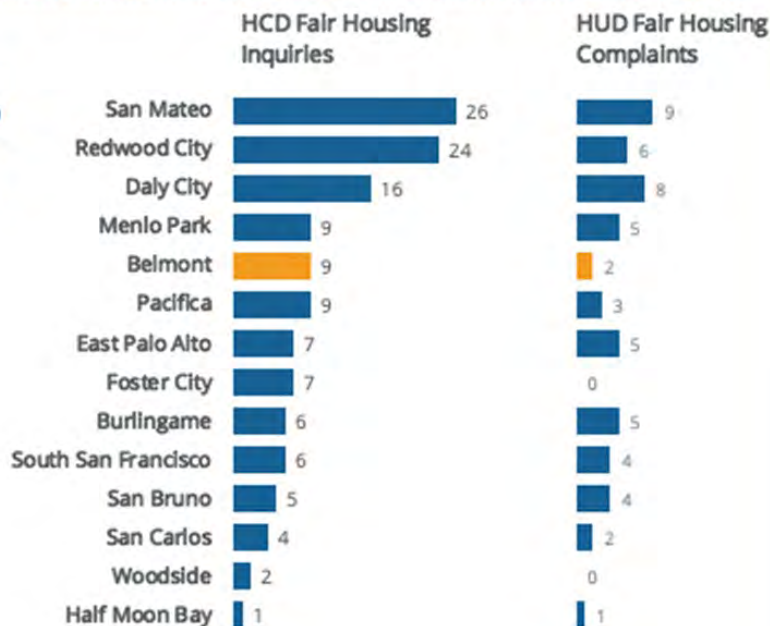
HUD Fair Housing Complaints, by Basis, San Mateo County, 2017-2021



	Number	Percent
Disability	32	56%
Race	11	19%
Familial Status	8	14%
National Origin	3	5%
Religion	2	4%
Sex	1	2%

Total cases 57 100%

HCD Fair Housing Inquiries (2013- 2021) and HUD Fair Housing Complaints (2017- 2021)



Nearly half of residents in San Mateo County (45%) felt they were discriminated against in the last 2 to 5 years, 28% within the past year, 20% over 5 years ago, and 7% did not remember. Almost half (42%) did nothing about the incident because they were not sure what to do, 30% moved or found somewhere else to live, and 20% did nothing out of fear that they would be evicted or harassed. These results are similar to that reported by Belmont residents (described below).

Local Fair Housing Issues. As discussed above, some Belmont residents do feel they were discriminated against. Actions taken after the discrimination include: doing nothing for fear of harassment or eviction (50%) or did not report the event because they were unsure what to do (38%). For Belmont, it is important to take note of the large volume of respondents who did not report the incidence due to lack of information on reporting discrimination. These results suggest that there is a lack of fair housing information being

provided to city residents on housing rights and how/where to file a housing discrimination complaint.

Residents have also been denied housing while seriously looking for rentals or homes. Overall, 62% of respondents living in Belmont had seriously looked for housing to rent or buy in the past five years. Of those who had looked for housing to rent or buy, 52% were denied housing. The top reasons for denial are listed below distinguished by prospective renters and homebuyers.

For Belmont respondents looking for rental housing, top reasons for denial include:

- 33% reported that the landlord did not return their calls or emails asking about the unit;
- 27% had been told by a landlord that the unit was available but when they showed up in person the unit was no longer available; and
- 27% were denied because another renter/applicant was willing to pay more in rent.

Reasons for denial among those seeking to buy a home include:

- 35% responded “none of the above;”
- 21% had a real estate agent that told them they would need to show that they were prequalified with a bank; and
- 15% were only shown homes in neighborhoods where most people were of the same race/ethnicity.

For both renters and homebuyers, denial reasons include:

- 38% were denied housing because their income was too low; and
- 27% reported that they haven’t established credit history or have no credit history.

When considering patterns of housing discrimination in the city, it is particularly important that 15% of Belmont respondents were only shown homes in neighborhoods where most people were of the same race/ethnicity. This practice is called steering—a form of housing discrimination—where housing providers influence a renter or buyer’s choice of community based on protected characteristics under the Fair Housing Act and state fair housing law. Steering practices are illegal and violate both federal and state law. City officials must take note of these findings as steering presents legal challenges for the city—especially if Belmont is found to be incompliant with federal and state fair housing law. Steering practices in housing activities also hinders the city’s fair housing progress and ability to provide city residents equal housing opportunity and housing choice.

Though less severe than steering practices, an additional fair housing obstacle for Belmont is local opposition to the city's plan to create more housing. This is a fair housing issue as opposition can hinder Belmont's ability to provide equal opportunity to access housing among protected classes. For the upcoming planning period (2023-2031), the city intends to surpass its RHNA allocation of 1,785 units by building 2,000 units at different affordability levels.

During the community outreach process for the Housing Element, residents in the Sterling Downs, Homeview, and El Camino neighborhoods expressed concern about the concentration of the housing development opportunity sites in their neighborhoods due to its potential impact on neighborhood character and traffic congestion. City officials specifically allocated projects in this area because of its designation as a local "Priority Development Area" with more transportation and public transit options for residents.⁹ In response to these concerns, staff worked with the residents of the community on revisions to the housing development opportunity sites and ultimately received their support for the adopted January 2023 Housing Element.

Importantly, local opposition is not unique to Belmont—opposition to housing elements present complications for jurisdictions throughout San Mateo County and Contra Costa County (specifically Lafayette). Overall Belmont Residents understand and support the need for new housing, including affordable housing, but support proposing housing development in all geographical areas of the City.

Local Enforcement and Capacity. Because Belmont is a relatively small jurisdiction with limited staff and funding resources, it relies on the assistance of outside providers to assist with fair housing enforcement, including Project Sentinel. When the City receives a complaint regarding a fair housing concern, it will reach out to Project Sentinel, a regional fair housing service provider for resolution. The City also maintains information on its website directing people who believe they have been discriminated against to Project Sentinel (<https://www.housing.org/>).

Compliance with Federal and State Fair Housing Laws. Belmont is compliant with the federal and state fair housing laws that stimulate housing development, advance housing choice, and further fair housing goals. There is no pending litigation against the City for fair housing violations.

Federal law. Belmont is in compliance with the Fair Housing Act (FHA). The city continuously ensures fair and equal housing opportunities for protected classes. Belmont also protects characteristics not covered by the FHA including marital status and ancestry. In 2014, Belmont furthered its fair housing efforts by adopting Zoning Ordinance Section

⁹ California News staff, 'New Housing Proposal Faces Backlash from East Belmont residents,' *California News*, Sep. 24, 2022, <https://darik.news/california/new-housing-proposal-faces-backlash-from-east-belmont-residents-scott-scoop-news/734006.html>.

27 to create simple procedures for persons with disabilities seeking equal access to housing under the Fair Housing Act.

Belmont is also compliant with the Americans with Disabilities Act (ADA). In accordance with Title II, the city designated an ADA Coordinator to oversee and coordinate city efforts to remain compliant with the ADA. The city also adopted a grievance procedure to provide prompt and equitable resolutions of non-compliance complaints.

State law. The City of Belmont is in compliance with the following state laws and has not been found of violating such laws.

- Housing Accountability Act (Gov. Code Section 65589.5), requiring the adoption of a Housing Element and requiring compliance with RHNA allocations;
- Not Net Loss Law (Gov. Code Section 65863, requiring that adequate sites be maintained to accommodate unmet RHNA allocations for all income levels;
- Limits on Growth Controls Law (Gov. Code Section 65589.5), prohibiting local agencies from denying housing development projects for very low-, low-, and moderate-income households or emergency shelters. The law provides the following exceptions:
 - 1) The city has a Housing Element approved by the state;
 - 2) The city has met or exceeded its RHNA allocation;
 - 3) The development would have an adverse impact on health or safety;
 - 4) The development is not compliant with state law; and
 - 5) The development is inconsistent with the jurisdiction's zoning ordinance or General Plan.
- Assembly Bill 1866, requiring cities to allow second units in all single-family residential zones and single-family dwelling units located in other residential zoning districts;
- Fair Employment and Housing Act, prohibiting discrimination in employment on the basis of numerous characteristics and discrimination in all housing activities (e.g., renting, leasing, terms and conditions) on the basis of disability status.

Housing Goals and Actions. Belmont's 2015-2023 Housing Element established goals and action items for housing development, assistance, and fair housing in the city. Many goal and action items proposed in the planning document have proven effective in addressing the unique needs of seniors, large families, disabled persons, single parents, and persons experiencing homelessness. Goals, policies, and actions are described in-depth below.

- Expand and protect housing opportunities for all economic segments and special needs groups in the community. Belmont has worked towards fulfilling this goal by:

- Using public financial resources to support the provision and production of housing for lower-income households and persons and families with special needs;
 - Providing rental and homeownership assistance;
 - Supporting the conservation of government subsidized and affordable housing; and
 - Providing supportive services for special needs groups.
- Establish emergency shelters. Belmont created the S-2 Emergency Shelter Combining District to allow emergency shelters by right in specific zoning districts. The city completed all proposed actions for this goal in December 2015.
 - Encourage housing developers to promote housing types for special needs populations. Actions the city has undertaken to achieve this are both ongoing and annual including working with special needs housing service providers to develop incentives for extremely low-income households and reaching out to supportive housing developers.
 - Ensure fair and equal housing opportunity for all protected populations under the Fair Housing Act (FHA)—actions to support this goal are ongoing and include supporting fair housing services and ensuring residents are aware of their rights and responsibilities.
 - Provide increased services and housing for disabled persons—Belmont completed its action items in 2014 by implementing a Reasonable Accommodation Ordinance and provided increased accessibility modifications.

Program and Service Review. The City of Belmont provides its residents various resources and programs related to affordable housing and fair housing. Programs and services currently provided by Belmont are listed below.

- Below Market Rate (BMR) Housing program—Belmont requires the construction of housing units that are affordable housing to low- and moderate-income households. Applications are considered on a “first come first serve” basis and BMR owners must occupy the home as their primary residence rather than renting the home.
- Emergency Shelter Program—the city meets with representatives from Shelter Network to determine opportunities for program support.
- Homesharing Services—Belmont partners with non-profits to facilitate homesharing to reduce housing costs, promote independence, and increase resident security. The city provides these services through the Home Investment Project for Housing (HIP), which receives annual financial assistance from the Belmont
- First-time Homeowners Workshops—in collaboration with the Housing Endowment and Regional Trust (HEART) organization, Belmont launched workshops for first-time homeowners in 2019.

- Special Needs and Extremely Low-income Housing—Belmont facilitates the creation of housing units for persons with developmental disabilities, homeless persons, and extremely low-income households. The city achieves this by providing financing for affordable housing developments that provide units for special needs populations and through leasing city-owned properties for group homes for special needs populations.
- Fair Housing Programs—the city provides annual financial support to the Peninsula Conflict-Resolution Center (PCRC) to establish city programs targeting conflict resolution, management, and resolution services for tenant-landlord disputes.
- Fair Housing Workshops—Belmont offers residents the opportunity to attend city workshops on fair housing. These workshops provide information on fair housing requirements, rights, and how fair housing supports and protects people of color, low-income families, renters, seniors, and persons with disabilities.

Belmont works with the following organizations to provide housing assistance to city residents:

- HIP Housing
- Housing Endowment and Regional Trust (HEART), providing homebuyer assistance
- San Mateo County Housing Search platform
- Renew Financial, providing residents energy efficient financing
- Shelter Network
- The Center for Independence of the Disabled (CID)
- Let's Talk Housing
- Kainos
- San Mateo County Homeless Outreach Team
- Second Unit Resources Center

Local Housing Policies. As described above, Belmont has made significant progress in implementing housing policies that promote housing production, funding for housing affordability, fair housing, and neighborhood stabilization.

For special needs populations—specifically disabled persons—the city adopted a Reasonable Accommodation Ordinance to allow for deviations from zoning regulations. The city also streamlines the processing of applications for Accessory Dwelling Units (ADUs). Additional housing tools are included below.

Housing Tools Leveraged in Belmont

Form based codes. Zoning that focuses on how a structure conforms to surrounding structures. Allows more flexibility in structure type and use.

Mixed use zoning. Zoning that allows commercial, retail, community and residential uses to occupy the same site. Can facilitate affordable housing by leveraging uses and encouraging onsite services.

Inclusionary housing. Requires that residential developments of 25 units or more provide 15% of units at affordable rents to low-income households.

In-lieu fees for inclusionary housing. Allows developers to pay a fee in-lieu of constructing affordable units required under the inclusionary housing ordinance.

Density bonuses. Allows residential development with 5 or more dwelling units providing low, very low, senior, or moderate-income housing additional density. Conforms to State Density Bonus law.

Commercial linkage fees. An impact fee for new commercial and residential developments that typically levies a per square foot fee that goes toward funding to develop or preserve affordable housing.

Results from the 2015-2023 Housing Element. Since the previous planning period, Belmont has achieved and fulfilled numerous goals and policy actions outlined in the city's 2015-2023 Housing Element. This section analyzes Belmont's progress in affordable housing development, new programs and ordinances implemented, and fair housing policies adopted. It also provides which actions included in the Housing Element were not achieved and the challenges that remain.

For the 2015-2023 cycle, Belmont surpassed its Regional Housing Needs Allocation (RHNA) obligations. This was largely due to the city's issuance of building permits. Though all affordability levels have not been met, since 2015, the city permitted 715 housing units. This is a significant achievement for the city—in eight years, Belmont had only built 31 units. Of these units, 510 are above market rate, 75 are moderate, 84 are low-income units, 35 are very low-income units, and 11 were extremely low-income units. Since 2022, development projects that would add 499 units are currently in the review process or have been approved.

As proposed in the Housing Element, the city adopted an inclusionary housing ordinance in January 2017 and an inclusionary rental ordinance in 2018. Examples of projects the City

approved during the prior housing element cycle and that completed construction in 2024 include:

- 1325 Old County Road—250 unit project with 38 low-income units (largely the result of the city's recently adopted inclusionary zoning requirement);
- 815 Old Country Road—a 177 unit development with 27 low-income inclusionary housing units.

In addition, Belmont committed funding for the following 100% affordable housing projects:

- 1300 El Camino built by Mid Pen Housing (66 affordable units);
- Hill Street and El Camino across from the city's train station (37 affordable units);
- 803 Belmont Avenue (125 units).

Belmont also changed its zoning terms from dwelling units per acre to floor area ratio (FAR)—this modification has increased project densities and created more affordable units. To increase Accessory Dwelling Unit (ADU) production, the City adopted an ADU ordinance and removed its mandatory parking replacement policy. Since taking these actions, the city has added 16 new ADUs per year on average. For housing development, the City has since adopted new funding sources including housing impact fees, commercial linkage fees, and inclusionary housing in-lieu funds.

To further fair housing and address local fair housing issues, Belmont works closely with the Peninsula Conflict Resolution Center (PCRC) to improve its fair housing enforcement capacity and with Project Sentinel to promote services to city residents and publicize fair housing information at the city's permit center.

While Belmont has seen numerous improvements since the previous planning period, some action items were not delivered. The city has attributed this to limited staff capacity and a lack of staffing resources. Policies and programs not implemented since the 2015-2023 Housing Element include:

- Establish an Existing Conditions Survey for single-family properties;
- Implement a two-year pilot Residential Records Request and Inspection Program;
- Implement a legalization/amnesty program for ADUs—this was not completed despite receiving \$160,000 in SB 2 Planning Grant Program funds; and
- Develop and implement a housing rehabilitation outreach program.

According to the California Department of Housing and Community Development AFFH Data Viewer (HCD data viewer), Belmont does not have any public housing buildings (Figure I-6, Attachment C.6). HCD's map of voucher holder locations shows Belmont as having three census tracts where less than 5% of units have voucher holders and two census tracts with no data (Figure I-7, Attachment C.6). This is a similar pattern in neighboring jurisdictions and in much of central San Mateo County. Voucher concentrations occur in and around Daly City, South San Francisco, and East Palo Alto.

Findings from the 21 Elements Resident Survey show 16% of survey respondents—who live in Belmont—as voucher holders. Of those who have a voucher, 64% of Belmont residents who responded to the survey indicated that it is somewhat difficult to find a landlord that accepts vouchers—this is significantly higher than those who reported that it is not difficult to find landlords who accept vouchers (14%) and those who believe it is very difficult (21%). Respondents indicated why they found it difficult to find a landlord accepting vouchers, these results are presented below.

- 64% indicated that they did not have enough time to find housing before the voucher expired;
- 45% responded that the voucher did not cover the rent for places they wanted to live;
- 36% said that landlords have policies of not renting to voucher holders;
- 27% reported not being able to find information on landlords who accept vouchers; and
- 9% reported facing other challenges in finding landlords accepting vouchers.

SECTION II. Integration and Segregation

This section discusses integration and segregation of the population by protected classes including race and ethnicity, disability status, familial status, and income status. The section concludes with an analysis of racially and ethnically concentrated areas of poverty and affluence.

Integration and Segregation

“Integration generally means a condition in which there is not a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability when compared to a broader geographic area.

Segregation generally means a condition in which there is a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a type of disability in a particular geographic area when compared to a broader geographic area.”

Source: California Department of Housing and Community Development Guidance, 2021, page 31.

Race and Ethnicity. Compared to San Mateo County, Belmont has a larger proportion of residents who identify as White, non-Hispanic and a smaller proportion of Hispanic residents. As shown in Figure II-1, Attachment C.6, 54% of Belmont residents are White, non-Hispanic versus 39% of the county and the Bay area overall. Twelve percent (12%) of Belmont residents are Hispanic, compared to 24% in the county and the Bay area overall ¹⁰ Belmont has become increasingly racially and ethnically diverse since 2000, largely due to growth in the Asian population (93% increase) and Hispanic population (57% increase) and a decline in the White, non-Hispanic population (17% decline).

Older residents are less diverse with 71% of the population older than 65 years identifying as White, compared to 58% of the population for children less than 18 years old.

By race and ethnic group in Belmont, poverty is highest for American Indian Alaskan Natives (41% live below the poverty line) and Black or African Americans (17%). These residents make up a very small proportion of the city (American Indian Alaskan Native residents totaled 61 in 2019 according to 5-year ACS data; Black or African Americans

¹⁰ In Belmont, the share of the population that identifies as American Indian or Alaska Native is less than 1% (61 residents); Black/African American is 1% (275 residents); and Other Races is 4% (1,192 residents).

totaled 275), and, as such, reflect a small number of people living in poverty (approximately 25 American Indian Alaskan Natives and 47 Black or African Americans).

When examined by income range, the data show a mixed picture with American Indian Alaskan Natives also showing a large proportion of high-income households—exhibiting a split income distribution with no middle-income households.¹¹ Households with the most even income distribution include Black or African American and Hispanic or Latinx.

Geospatially, Belmont is split between census tracts with a sizeable gap of White majority residents, as shown in the White Majority Census Tracts map in Figure II-7, Attachment C.6. The census tracts identified as “Predominant[ly]” White majority are located in the far northwest and far southeast parts of the city, with the latter directly adjacent to White majority tracts that comprise most of San Carlos. Compared to northern jurisdictions in the county, Belmont has more White majority tracts; compared to southern jurisdictions of San Carlos, Woodside, and Menlo Park, Belmont has far fewer White majority tracts. White majority census tracts in Belmont are likely the result of historical and existing land use policies and practices. Land use regulations often influence the type of housing that is built in specific areas/neighborhoods of the city as well as demographic shifts. High costs of living and property values in Belmont are also contributing factors to segregation patterns as income groups varies by race and ethnicity. The city has no Asian majority tracts, no Hispanic majority tracts, and only one segregated neighborhood, as defined by the state Census tract with less than an even balance of racial groups; the far northwestern city Census tract is mostly comprised of Asian and White residents (Figure II-10, Attachment C.6).¹²

Belmont’s diversity index is low to moderate. **The census tract with the highest diversity abuts Highway 101.** Data do not show this tract as having concentrations of vouchers or public housing, yet this tract does contain several apartment complexes.

Dissimilarity and Isolation Indices. The Dissimilarity Index, or DI, is a common tool that measures segregation in a community. The DI is an index that measures the degree to which two distinct groups are evenly distributed across a geographic area. The DI represents the percentage of a group’s population that would have to move for each area in the county to have the same percentage of that group as the county overall.

DI values range from 0 to 100—where 0 is perfect integration and 100 is complete segregation. Dissimilarity index values between 0 and 39 generally indicate low segregation, values between 40 and 54 generally indicate moderate segregation, and values between 55 and 100 generally indicate a high level of segregation.

¹¹ A large margin of error due to the limited sampling of AIAN residents by the Census is also a factor.

¹² Redlining maps, otherwise known as Home Owners’ Loan Corporation (HOLC) maps, are not available for San Mateo County.

In the Bay Area region, non-Hispanic White residents are more segregated than all other racial and ethnic groups, with the highest levels of segregation among Black and White residents. Segregation among Black and White residents in Belmont is similar to that of the Bay Area region, though rates of isolation among White residents have progressively decreased between 2000 and 2020. According to 2015 data, Belmont has a dissimilarity index of 0.165 among Black and White residents—this means that 16.5% of Black or White residents would need to move to a different neighborhood to create perfect integration among Black and White residents in Belmont.

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.

Isolation indexes among income groups in Belmont are similar to those among racial and ethnic groups. In Belmont, above moderate-income groups are the most isolated group with above moderate-income residents living in neighborhoods where 52.7% of residents are considered above moderate-income.

Segregation for income groups in Belmont is rather similar to segregation throughout the Bay Area region—though rates in Belmont are slightly lower. This is largely due to Belmont’s relatively low population of low-income residents. For example, in 2015 low-income groups comprised 21.99% of Belmont’s overall population—this compares to 28.7% in the Bay Area region.

Disability Status. The **share of the population living with at least one disability is 9% in Belmont** compared to 8% in San Mateo County. There are two census tracts in the city that have a 10% to 20% share of the population living with a disability; both are located in the central part of Belmont (Figure II-14, Attachment C.6). Geographic concentrations of people living with a disability may indicate a need for **increased access to services, amenities, and transportation that support this population.**

For example, according to the Resident Survey, Belmont residents with a disability are more likely to experience ambulatory difficulties (3.6%), followed by an independent living difficulty (3.2%) and cognitive difficulties (3.2%). Disabled persons in Belmont are least likely to experience vision difficulties (1.2%)—these data are presented in Figure III-18, Attachment C.6. Similar to geographic concentrations, disability type is important to identifying needs. For example, persons with an ambulatory difficulty may require additional funding for transportation and programs to improve disabled persons’ ability to access public transit.

Familial Status. A majority of households in Belmont are made up of married-couples, and the city has a higher proportion of married-couple households (62%) than the county (55%) or Bay area overall (51%). Belmont has a similar share of single-person households as the county and Bay area but a smaller share of single parent households—10% in

Belmont versus 15% in the county and Bay area—as well as “other” household types, such as roommates (Figure II-17, Attachment C.6).

Familial status can indicate specific housing needs and preferences. A larger number of nonfamily or single person households indicates a higher share of seniors living alone, young adults living alone or with roommates, and unmarried partners. Higher shares of nonfamily households indicate an increased need for one and two bedroom units. Belmont is slowly aging (Figure II-15, Attachment C.6), yet the city does not have a disproportionately higher share of single-person households. This could change in the future—leading to **increased demand for in-home care and supportive services—if Belmont’s older adults remain in their homes as they age.**

Belmont’s owner-occupied homes are mostly 3 to 4 bedroom units, while rental units are mostly 1 to 2 bedroom (Figure II-20, Attachment C.6). This distribution aligns well with the distribution of household types. Compared to the county, Belmont has a smaller proportion of large (5 persons+) households (Figure II-16, Attachment C.6), which is partially due to the city’s limited number rental units with 5 or more bedrooms and, to a lesser extent, 3 to 4 bedrooms.

In its analysis of housing needs for Belmont, the Association of Bay Area Governments (ABAG) reports that between 2010 and 2020, the number of single-family units in Belmont increased more than multi-family units: 33 new single-family detached homes were built compared to 18 attached homes, and 18 multi-family units. Belmont’s share of single-family homes is about average for jurisdictions in the county, although there is a large variance in shares. For example, single-family homes comprise 58% of Belmont’s housing stock compared to 44% of the City of San Mateo’s, 56% of San Bruno’s, 68% of San Carlos’, and 98% of Atherton’s.

Single parent households often have unique needs and need targeted programs and policies to keep and maintain their housing. In Belmont, single parent households—both single male householders and single female householders—comprise a small portion of households overall. Female-headed family households only comprise 7% of households in the city while male-headed family households comprise 3%. These rates are similar to that of San Mateo County and the Bay area, though Belmont has a lower rate among both household types. There are no census tracts with a concentration of single females with children in the city, this is likely due to the low number of households headed by single females (Figure II-22, Attachment C.6).

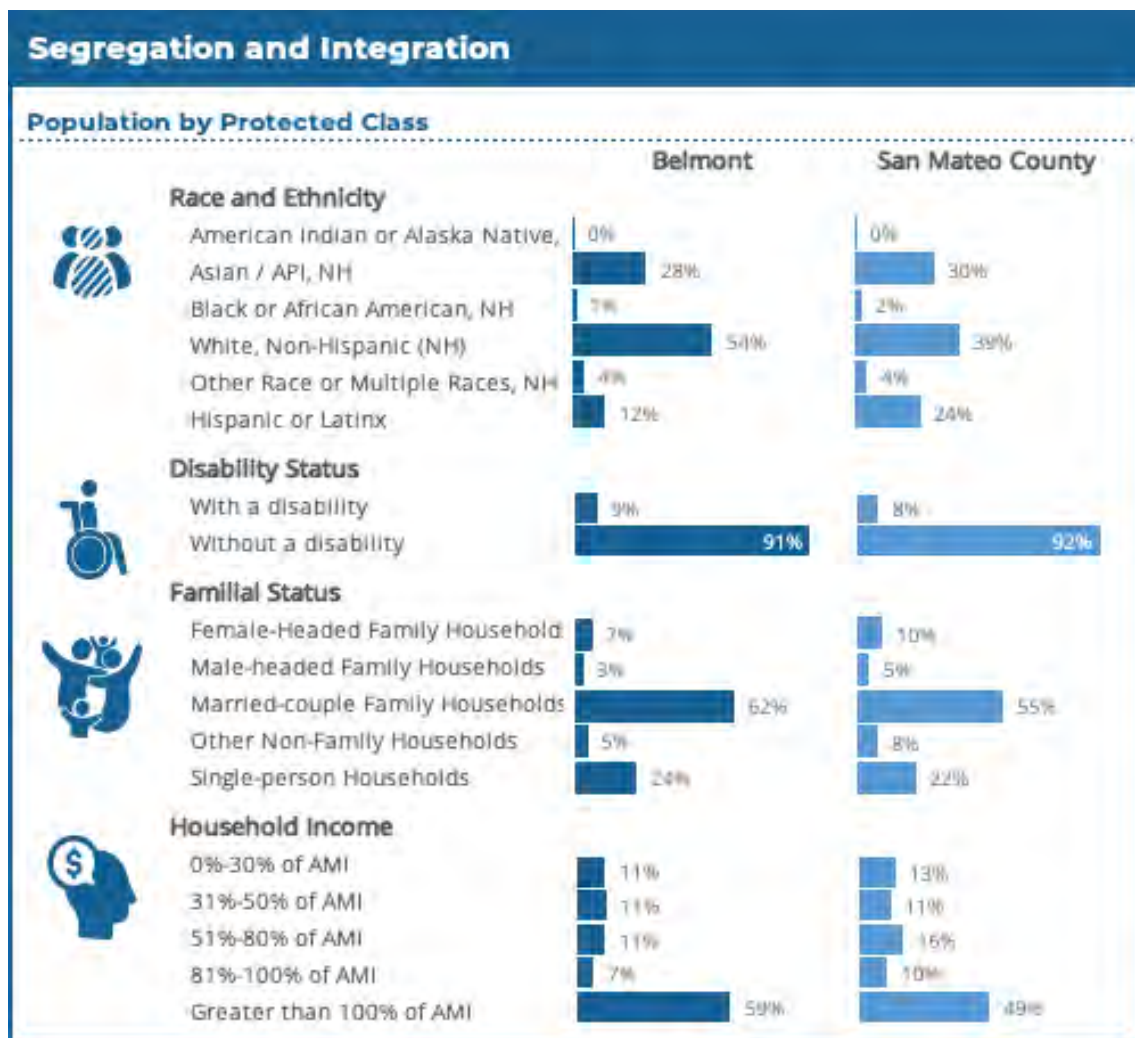
Female headed family households are more likely than male headed family households to be renters. As shown in Figure II-19, Attachment C.6, there are 394 renter-occupied female headed family households compared to 146 of male family households. However, more female headed family households own their home. In Belmont, there are 290 units owned by single female households compared to 171 of male headed family households.

Household Income. Compared to San Mateo County, Belmont has:

- **A much higher proportion of high-income households:** 59% of households in Belmont earn 100% of the AMI and more, versus 49% in the county;
- **A similar share of very low-income households** earning between 31% and 50% AMI and less (11% in Belmont, versus 11% in the county); and
- **A slightly lower share of extremely low-income households** earning less than 30% of AMI (11% in Belmont versus 13% in the county);
- **A much smaller share of middle-income households** earning between 50% and 100% AMI (18% in Belmont, versus 26% in the county).

The city also has fewer 0-30% AMI households than the Bay area overall as a proportion of total households, fewer middle-income households, and more high-income households.

Belmont’s neighborhoods are all moderately high to very high-income, with no significantly concentrated low-income households (Figures II-26 and 27, Attachment C.6) or poverty



concentrations (Figure II-28, Attachment C.6). Compared to other jurisdictions, Belmont exhibits more variance in income distributions than others in the county when examined spatially by census block group (Figure II-27, Attachment C.6).

Racially or ethnically concentrated areas of poverty and affluence.

Racially Concentrated Area of Poverty or an Ethnically Concentrated Area of Poverty (R/ECAP) and Racially Concentrated Areas of Affluence (RCAAs) represent opposing ends of the segregation spectrum from racially or ethnically segregated areas with high poverty rates to affluent predominantly White neighborhoods. Historically, HUD has paid particular attention to R/ECAPs as a focus of policy and obligations to AFFH. Recent research out of the University of Minnesota Humphrey School of Public Affairs argues for the inclusion of RCAAs to acknowledge current and past policies that created and perpetuate these areas of high opportunity and exclusion.¹³

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.

It is important to note that R/ECAPs and RCAAs are not areas of focus because of racial and ethnic concentrations alone. This study recognizes that racial and ethnic clusters can be a part of fair housing choice if they occur in a non-discriminatory market. Rather, R/ECAPs are meant to identify areas where residents may have historically faced discrimination and continue to be challenged by limited economic opportunity, and conversely, RCAAs are meant to identify areas of particular advantage and exclusion.

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 which hit two thirds of the HUD defined threshold for poverty—emerging R/ECAPs in San Mateo County have two times the average tract poverty rate for the county (12.8%).

¹³ 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

In 2010 there were three Census Tracts that qualify as R/ECAPs (19.4% poverty rate) in the county and 11 that qualify as edge R/ECAPs (13% poverty rate). None of the 2010 R/ECAPs or edge R/ECAPs were located in Belmont.

In 2019 there were two Census Tracts that qualify as R/ECAPs (19.1% poverty rate) in the county and 14 that qualify as edge R/ECAPs (12.8% poverty rate). None of the 2019 R/ECAPs or edge R/ECAPs were located in Belmont.

RCAAs.

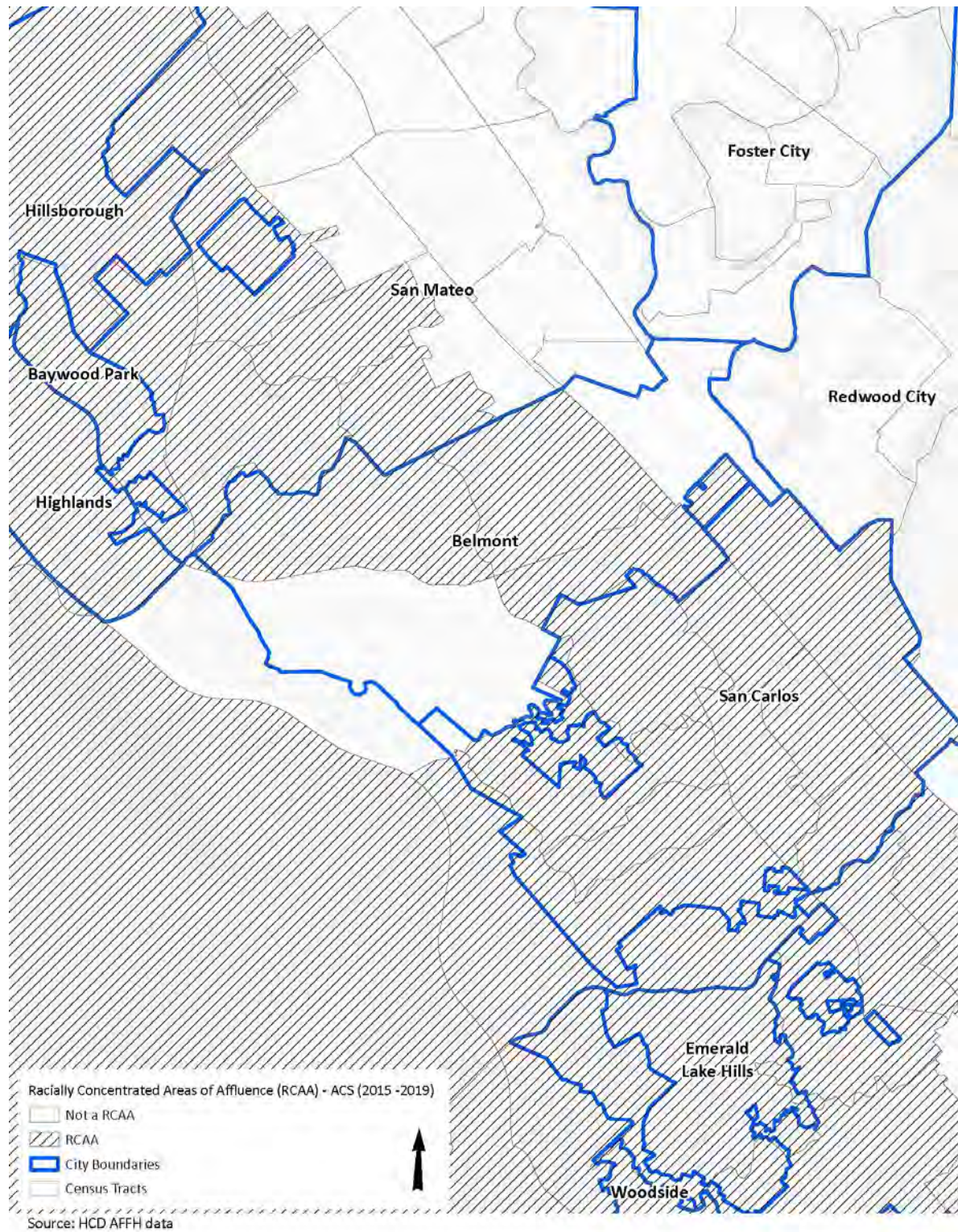
HCD's definition of a Racially Concentrated Area of Affluence is:

- A census tract that has a percentage of total white population that is 1.25 times higher than the average percentage of total white population in the given COG region, and a median income that was two times higher than the COG AMI.

As shown above, the majority of Belmont is considered an RCAA. Interestingly, census tracts where cost burdened renters live (discussed in following sections) are not a RCAA. Census tract 6086—which is not a RCAA—is surrounded by jurisdictions without RCAAs in their adjacent census tracts. Alternatively, census tract 6089 is surrounded by RCAAs. This suggests that Belmont residents in this tract are likely from lower-income and non-White households.

It is important to note that census tracts that are not RCAAs are located on the outer edges of the city. This geographic pattern in Belmont could suggest that lower-income and non-White households are being excluded. Contributing factors may include lack of civic participation in outlying areas. When dedicating funding and resources, geographic areas (and patterns) that are not a RCAA should be considered.

Figure C-1. Racially Concentrated Areas of Affluence (RCAs), Belmont, 2015-2019



SECTION III. Access to Opportunity

This section discusses disparities in access to opportunity among protected classes including access to quality education, employment, transportation, and environment.

Access to Opportunity

“Access to opportunity is a concept to approximate place-based characteristics linked to critical life outcomes. Access to opportunity oftentimes means both improving the quality of life for residents of low-income communities, as well as supporting mobility and access to ‘high resource’ neighborhoods. This encompasses education, employment, economic development, safe and decent housing, low rates of violent crime, transportation, and other opportunities, including recreation, food and healthy environment (air, water, safe neighborhood, safety from environmental hazards, social services, and cultural institutions).”

Source: California Department of Housing and Community Development Guidance, 2021, page 34.

The California Tax Credit Allocation Committee (TCAC), in collaboration with HCD, developed a series of opportunity maps that help to identify areas of the community with good or poor access to opportunity for residents. The opportunity maps highlight areas of highest resource, high resource, moderate resource, moderate resource (rapidly changing), low resource and high segregation and poverty. TCAC provides opportunity maps for access to opportunity in quality education, employment, transportation, and environment. The TCAC opportunity maps are useful in comparing how well the sites identified for affordable housing and mixed-income development compare with opportunity access in a jurisdiction overall and against other neighborhoods. The overall goal of that analysis is to create a better balance in the siting of affordable housing among opportunity areas.

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 Belmont have schools with the most positive educational outcomes.** Belmont offers a strong educational environment citywide.

The City of Belmont is served by the Sequoia Union High School District and the Belmont-Redwood Shores Elementary School District. Sequoia Union is fed by eight elementary school districts in the county.

Enrollment. Overall enrollment in the high school district increased 18% between the 2010-2011 and 2020-2021 school years. Enrollment fluctuated significantly among

Elementary School Districts, however, with the Belmont-Redwood Shore district far outpacing any other district for enrollment increases.

Between the 2010-2011 and 2019-2020 school years, **elementary school enrollment in the Belmont-Redwood Shores district increased by 35%**, or more than 1,000 students. Enrollment dropped slightly between the 2020 and 2021 school years (down 162 students), for an overall enrollment change of 30%.

Student diversity. The Belmont-Redwood Shores elementary student body has grown more racially and ethnically diverse since 2011, mostly due to an increase in Asian students (24% in 2010-2011 versus 32% in 2020-2021) and multi-race students (4% to 14%). The proportion of White students has declined (55% to 34%), while the proportion of Hispanic students has increased slightly (15% versus 12%).

Compared to the county overall, the Belmont-Redwood Shores Elementary School District has:

- A much larger share of Asian students (32% versus 17%),
- A lower share of Filipino students (3% versus 8%),
- A much lower share of Hispanic students (12% versus 38%),
- A slightly larger share of White students (34% versus 26%), and
- A much larger share of mixed-race students (14% versus 8%).

Enrollment of special student groups in Belmont-Redwood Shores has been relatively stable over time: 7% of students qualify for free and reduced lunch (FRL) and 10% are English language learners (versus 6% and 8%, respectively, in 2011). Even during the early part of the pandemic, when the county experienced a loss of English Language Learners (decline of 5%), the Belmont-Redwood Shores school district was able to retain these students.

Many schools have sought to increase their diversity of teaching and administrative staff to improve inclusivity for students of color. The gap in student and staff/teacher Hispanic representation is higher in the Sequoia Union High School District than in other districts in the county.

Extenuating circumstances. The Belmont-Redwood Shores district reports no students who are in foster care, are experiencing homelessness, or are members of migrant families as of the 2020-2021 school year. **Chronic absenteeism is low for students in the Belmont-Redwood Shores district overall, yet varies by student group**, with Hispanic and Pacific Islander students having relatively high rates (12% and 17%, respectively), and students with disabilities at 10%.

Test proficiency. Students in the Belmont-Redwood Shores district score well on state tests: 82% meet or exceed English language arts and literacy standards; 79% exceed

math standards. This compares to 62% (English) and 52% (math) for the county overall. However, this varies considerably by race and ethnicity, with 44% of Black or African American students and 64% of Hispanic students meeting or exceeding state English language arts standards and 37% of Black or African American students and 52% of Hispanic students meeting or exceeding state math standards.

Students with disabilities in the Belmont-Redwood Shores district do well compared to other districts: 43% of students with disabilities are proficient in math (only Hillsborough Elementary is higher at 48%), and 45% are proficient in English (Woodside is higher at 56%; Hillsborough at 47%).

College readiness. 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.

Drop-out rates and suspensions. Although San Mateo Union High School has relatively low drop-out rates—4% of students—compared to other districts in the county, **drop-out rates among Pacific Islander (20%), Hispanic (16%), and Black (12%) students are significantly higher.**

Suspensions are disproportionately high for Hispanic students. Hispanic students make up 34% of the high school district student body, yet account for 66% of suspensions.

Employment. The professional and managerial services industry provides the largest number of jobs in Belmont and has increased the number of jobs faster than any other industry except for the information industry (Figure III-3, Attachment C.6). The health and educational services industry is the second largest provider of jobs in the city, with all other industries providing a much smaller share.

Belmont has a much lower job to household ratio when compared to the county, at 0.62 which is a decline from 0.75 in 2002. This compares to 1.59 for the county and 1.47 for the Bay area. The city is a net provider of workers to the region, mostly of high-wage workers, based on the jobs to workers ratio by wage (Figure III-5, Attachment C.6). The city also has a slightly lower unemployment rate than the county and Bay area.

TCAC's economic opportunity score is comprised of poverty, adult educational attainment, employment, job proximity, and median home value. Except for the census tract abutting Highway 101 and the south central tract that borders San Carlos, Belmont's neighborhoods are classified as having the most positive economic outcomes. These two outlier tracts have a higher incidence of lower-income households.

HUD's job proximity, which measures how close residents in a census tract can access jobs in the regional employment market (with larger employment centers weighted more heavily) shows that Belmont's proximity to jobs is about average—better than cities located further south but not as strong as cities to the north, who are closer to the City of San Francisco. According to the AARP Public Policy Institute, approximately 30,055 jobs in the city can be accessed by public transit while 108,262 jobs can only be accessed by car. Employment accessibility can provide barriers to economic success, especially if public transportation costs exceed what residents can afford. In 2022, the AARP Public Policy Institute estimated that household transportation costs were \$15,354 per year. Cost and severely cost burdened households will likely struggle to afford public transportation if yearly public transit expenses increase.

Economic outcomes are also reliant on broadband and internet access. In 2022, 99.8% of Belmont residents had access to high-speed internet—this likely contributes to positive scores in the city. However, Belmont does not have policies in place to remove barriers for residents without broadband access; however, County CDBG funding could be used for this purpose.¹⁴

As will be discussed below, persons with disabilities do not appear to face unique barriers in accessing employment and employment opportunities. According to ABAG data, employment and unemployment rates among disabled persons and persons without a disability are relatively similar.

Transportation. 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.

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 Belmont and the county overall¹⁵.

Although Belmont was not mentioned specifically in the plan, its residents with public transportation needs have not grown significantly. Even if public transportation needs have not grown, Belmont residents still face difficulty in accessing public transit options. According to findings from the 21 Elements Resident Survey, 19% of Belmont respondents find it difficult to access public transit safely and easily (e.g., bus or light rail). This is 25%

¹⁴ <https://livabilityindex.aarp.org/search/Belmont,%20California,%20United%20States>.

¹⁵ https://mtc.ca.gov/sites/default/files/MTC_Coordinated_Plan.pdf

above that of the region. Accessing public transit is also difficult for residents in Brisbane (29%), Hillsborough (25%), Pacifica (21%), and Half Moon Bay (18%). Relatedly, 14% of Belmont respondents indicated that city buses/rails do not go where residents need to go or operate during the times they need. Thirty-one percent (31%) of Belmont residents also reported living in neighborhoods without adequate walking areas—this rate is 25% above that of the county overall.

Belmont has taken steps to remove barriers for disabled persons in accessing public transportation. For instance, 89% of public transit stations comply with regulations established by the Americans with Disabilities Act (ADA). San Mateo County and Belmont also have Transit Oriented Development (TOD) programs to improve walkability surrounding transit stations and access to transit stops.

In the county overall, the primary gaps in transportation access include:

- The “spatial gaps” in public transportation continue to be a challenge. Lack of connectivity can make it very difficult for populations reliant on public transit to access the region.
- Transit and paratransit systems lack service in the evenings, late at night, and on weekends—which can limit users’ access to jobs, education, and entertainment.
- The areas in the region that are aging the fastest are suburban and rural in nature—and can be difficult to serve by fixed-route transit.
- Fees to access transit and paratransit are too high for many low- and fixed-income households.
- Funding needs are growing faster than revenues.

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.”¹⁶ TRACS highlights that improving accessibility requires engagement for the community because there are no “watch-dog” 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, **“it is my sense that SamTrans is the best Bay Area transit provider in terms of overall disability accommodation.”**

¹⁶ <https://wid.org/transportation-accessibility/>

The San Mateo County Transit District updated their Mobility Plan for Older Adults and People with Disabilities in 2018. According to the district, the **county's senior population is expected to grow more than 70% over the next 20 years and the district is experiencing unprecedented increases in paratransit ridership**. The plan is targeted at developing effective mobility programs for residents with disabilities and older adults including viable alternatives to paratransit, partnerships, and leveraging funding sources.¹⁷

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.¹⁸

Environment. TCAC's opportunity areas environmental scores are based on the CalEnviroScreen 4.0 indicators which include pollution metrics such as ozone, PM2.5, diesel PM, drinking water, pesticides, toxic release, traffic, cleanup sites, groundwater threats, hazardous waste, impaired water bodies, and solid waste sites.

Belmont **scores moderately-high on environmental outcomes**. The one census tract that abuts Highway 101 has the lowest environmental score in the city; this is also the tract with the most diversity of housing types. The reason for this score is primarily the result of exposure to traffic and the resulting pollution from vehicle traffic. It is important to note that no housing opportunity sites are located in the area next to Highway 101 in this tract to ensure no additional concentration of housing units next to the freeway.

All of Belmont's neighborhoods have the strongest measures in the **California Healthy Places Index (HPI)** (Figure III-11, Attachment C.6) 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.¹⁹ This index suggests that all parts of Belmont provide residents access to healthy environments as measured by the index.

Despite having a comparatively high HPI, Belmont residents do face environmental hazards. The AARP Public Policy Institute provides livability indexes²⁰ for all cities and counties based on categories such as housing, neighborhood characteristics (e.g., access to grocery stores), transportation, environment, health, engagement, and opportunity. According to the AARP Public Policy Institute, Belmont has an environmental index of 46 (out of 100). This index is based on the city's drinking water and air quality and near-roadway pollution. In 2022, 0.04% of Belmont residents are exposed to drinking water violations and there are 7.3 unhealthy air quality days per year—this represents an increase from 0% of people exposed to poor drinking water in 2015 and 1 unhealthy air

¹⁷ https://www.samtrans.com/Planning/Planning_and_Research/Mobility_Plan_for_Older_Adults_and_People_with_Disabilities.html

¹⁸ <https://mtc.ca.gov/planning/transportation/access-equity-mobility/clipperr-startsm>

¹⁹ <https://healthyplacesindex.org/about/>

²⁰ Livability indexes provided by the AARP Public Policy Institute are based on data from the US Census Bureau, ACS data, and related city and county policies.

quality day per year in 2015. The environmental index provided by AARP also shows that 28% of residents were exposed to near-roadway pollution in 2022.

Environmental constraints. The City of Belmont released a report on the city's Housing Constraints.²¹ The report includes environmental constraints in the city and how these constraints impact residential development and development costs. According to the report, Belmont experiences environmental issues ranging from suitable land for development, the provision of adequate infrastructure, and energy costs.

As stated in the Housing Constraints report, Belmont encompasses approximately 2,955 acres and the majority of the city's parcels are developed. Undeveloped parcels are in the Western Hills area with small amounts in the San Juan area and areas east of Highway 101. However, Belmont identified numerous environmental constraints on development in these areas including steep slopes, landslide hazards, fire hazards, and flood hazards. Other constraints outlined in the report include seismic hazards, topography/slope, sea level rise, and water/sewer capacity.

Disparities in Access to Opportunity. Because Belmont is classified as a high resource area throughout and lacks racial and ethnic concentrations, the distribution of residents among high resource areas matches the city's racial and ethnic distribution (Figure III-12, Attachment C.6).

TCAC's composite opportunity score for Belmont shows all but one census tract as "highest resource." The census tract bordering Highway 101 is classified as "high resource."

The Social Vulnerability Index (SVI) provided by the Centers for Disease Control (CDC)—ranks census tracts based on their ability to respond to a disaster—includes four themes of socioeconomic status, household composition, race or ethnicity, and housing and transportation. Belmont is rated as having low to moderately-low vulnerability to disasters (Figure III-15, Attachment C.6).

Belmont 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."²²

²¹ <https://www.belmont.gov/home/showpublisheddocument/21605/637921852304683878>.

²² <https://oehha.ca.gov/calenviroscreen/sb535>

Disability

“**Disability types** include hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty.”

Source: California Department of Housing and Community Development Guidance, 2021, page 36.

Disparities Specific to the Population Living with a Disability. Nine percent (9%) of the population in Belmont is living with at least one disability, compared to 8% in the county. The most common disabilities in the city are ambulatory (3.6%), independent living (3.2%), and cognitive (3.2%).

For the population 65 and over the share of the population with an ambulatory or independent living difficulty increases significantly—to 14.4% of the senior population. Should Belmont’s seniors choose to age in place, demand for in-home care, paratransit, and accessibility improvements will increase.

Persons with disabilities have unique needs and often face greater barriers in finding housing that meets their needs, accessing employment opportunities, and accessing public transportation. This section provides an in-depth analysis of these needs and Belmont’s progress in meeting them.

Disabled persons living in Belmont are more likely to have an ambulatory difficulty (3.6%), followed by an independent living difficulty (3.2%) and cognitive difficulties (3.2%). Only 1.2% of disabled persons in the city have a vision difficulty. Although persons with disabilities often face greater barriers in accessing jobs and employment opportunities, employment rates among Belmont’s population of disabled persons is similar to that of non-disabled residents. As shown in Figure III-20, Attachment C.6, 95% of disabled residents are employed, only 5% are unemployed. For residents without a disability, 97% are employed and 3% unemployed. Employment rates for disabled persons in Belmont suggest that persons with disabilities do not—on average—experience disparities in accessing employment opportunities.

Belmont has made various efforts to improve disabled persons’ ability to access housing, employment, and supportive services. Belmont supports and provides housing for persons with disabilities (including developmental disabilities). The city currently owns two low- and very low-income group homes for adults with developmental disabilities. Belmont also works closely with the Center for Independence of Individuals with Disabilities (CID) to provide disabled residents with services including housing accessibility modifications, independent living skills training, and peer counseling. In the city’s Notice of ADA Compliance,²³ Belmont committed the city to improving communication to ensure that all

²³ <https://www.belmont.gov/home/showdocument?id=16121>.

disabled persons can participate in all city programs, services, and activities. More specifically, Belmont will—upon request—provide aids and services for effective communications including sign language interpreters and documents in Braille (or alternative formats) to provide accessible information and communication to people with speech, hearing, vision, or cognitive impairments. Expanding on this, Belmont modified its city codes to allow individuals with service animals in city offices and facilities—even if pets are prohibited. The city also designated an ADA Coordinator to maintain, track, and address discrimination cases and accessibility barriers.

In 2018, the city developed a Transition Plan—based on the city’s 2017 self-evaluation report—to determine which facilities and neighborhood infrastructure must be changed to remain compliant with the Americans with Disabilities Act (ADA).²⁴ To develop the plan, Belmont evaluated existing policies and practices, identified obstacles that limit accessibility, set numerous priorities for barrier elimination, and launched community events at senior centers to gather input from the city’s population of disabled persons. Below is a list of proposed measures, practices, and policies for Belmont to implement to address accessibility problems and incidents of discrimination on the basis of disability status.

- Implement a formal policy to address federal and state legal requirements—this policy would institutionalize organizational procedures to address accessibility features if and when they fail (e.g., accessible elevators);
- Establish an annual General Fund dedicated to mitigating accessibility barriers;
- Find funding sources including funds associated with the city’s Capital Improvement project funds and existing city projects; and
- Provide accessible features including—but not limited to—accessible routes, ramps, and elevators.

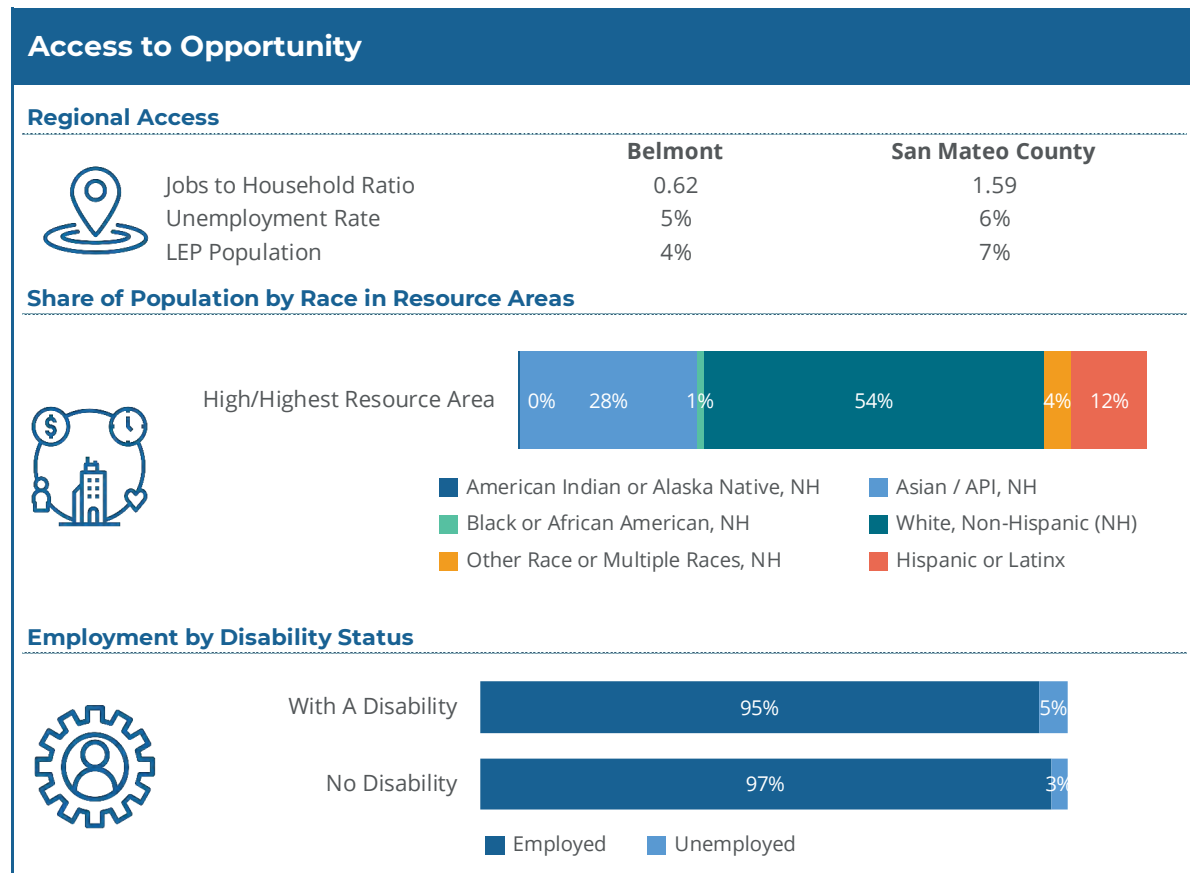
According to community input, accessibility concerns are largely based on daily travel routes and sidewalks. One participant, for instance, shared that city streets only have shoulders—this has forced disabled persons to share the street with vehicles. The city also lacks curb ramps allowing for transitions between streets to areas with limited segments of sidewalks. Other accessibility concerns include tripping hazards due to sidewalk and intersection barriers.

Findings from the 21 Elements Resident Survey support feedback from residents. Belmont residents—regardless of disability status—identified neighborhood infrastructure as the greatest housing and neighborhood challenges they encounter. In fact, residents in Belmont experience problems such as bad sidewalks and no lighting more acutely than the county overall. Thirty-one percent (31%) of Belmont respondents identified these problems

²⁴ <https://www.belmont.gov/home/showpublisheddocument/19520/637240186694170000>.

as the greatest challenge they face—this is similar to feedback from residents in East Palo Alto (40%), Daly City (25%), and Hillsborough (23%).

Actions the city has taken to improve accessibility features and further accommodate their population of disabled persons have been largely successful—especially in terms of providing housing that meets residents’ accessibility needs. Findings from the 21 Elements Resident Survey demonstrate Belmont’s progress in providing housing opportunity and supportive services. For example, the resident survey asked respondents—with a disability—to share their perspective on their housing situations (e.g., accessibility improvements). Eighty-nine percent (89%) of disabled persons in Belmont reported living in housing that met their needs. Of those who do not live in such housing, 62% of respondents reported needing grab bars in their bathroom and/or a bench in their shower and 67% need supportive services to help them take care of themselves or their home. These results are substantially more positive than feedback collected from the county overall—74% of all respondents in San Mateo County indicated that their housing situation does meet their accessibility needs. Accessibility features and services that Belmont residents need are similar to that of the county overall.



SECTION IV. Disproportionate Housing Needs

This section discusses disparate housing needs for protected classes including cost burden and severe cost burden, overcrowding, substandard housing conditions, homelessness, displacement, and other considerations.

Disproportionate Housing Needs

“Disproportionate housing needs generally refers to a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing need when compared to the proportion of members of any other relevant groups, or the total population experiencing that category of housing need in the applicable geographic area. For purposes of this definition, categories of housing need are based on such factors as cost burden and severe cost burden, overcrowding, homelessness, and substandard housing conditions.”

Source: California Department of Housing and Community Development Guidance, 2021, page 39.

Housing Needs. According to ABAG, the population of Belmont increased by 6.7% from 2000 to 2020, which is below the growth rate of the Bay area. However, the city’s population growth has generally been in line with the county.

ABAG also reports that the number of homes in Belmont increased, 0.6% from 2010 to 2020, below the growth rate for San Mateo County and the broader region.

A total of 240 building permits were issued in Belmont between 2015 and 2020. Of those:

- 138, or 57.5% were for above moderate-income units,
- 36, or 15% were for moderate-income units,
- 44, of 18.3% for low-income units, and
- 22, or 9%, for very low-income units.
- Altogether, more than one-fourth of the permits were for low and very low-income units.

The majority of the housing inventory in Belmont was built between 1940 and 1960 (5,131 units), followed by 1960 to 1979 (3,358 units). **The number of units built after 2010 (470) is three times the number built between 2000 and 2009 (just 149)—a positive trend for addressing housing gaps.** The age of Belmont’s housing stock is especially important for city officials to consider when establishing programs for housing rehabilitation. The

needs analysis estimates that there are approximately 1,311 total units needing rehabilitation, from minor repairs to substantial rehabilitation.

Belmont has a much larger share of owner-occupied units priced between \$1 million and \$2 million than the county—65% of units in the city fall within this price range compared to 37% in the county. Just 18% of Belmont’s owner-occupied units are priced below \$1 million, compared to 44% for the county and 65% for the Bay area overall.

According to the Zillow home value index, home prices have experienced remarkable growth in the city and county since 2011, with Belmont’s prices accelerating faster than the county or Bay area overall (Figure IV-5, Attachment C.6).

Rents in Belmont have increased at the same pace as in the county and remain about 30% higher than rents in the Bay area overall. Belmont’s rental distribution is more closely aligned with the county’s overall but much less affordable than the Bay area overall (Figure IV-6, Attachment C.6). In Belmont, 65% of rental units are priced at \$2,000 or more, compared to 59% in the county, and 42% for the Bay area overall.

Condition of Housing Stock. Despite Belmont having a relatively younger housing stock, residents seem to face housing condition challenges at higher rates than the county overall. In the 21 Elements Resident Survey, 15% of respondents from Belmont indicated that their home or apartment is in bad condition while 10% reported having bed bugs, insects, or a rodent infestation—both of which are 25% above the regional average. Additionally, 22% of respondents reported that their home or apartment is not big enough for their family. These findings supplement housing data and provide greater direction for the city when identifying rehabilitation programs and policies.

Cost Burden and Overpayment. Belmont households face lower rates of cost burden—spending more than 30% of gross income on housing costs—than in the county and Bay area overall²⁵. Seventeen percent (17%) of Belmont households are cost burdened (versus 20% in the county) and 13% are severely cost burdened (versus 17% in the county), spending more than 50% of their gross income on housing costs. 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.

Cost burden is much higher for renters: in Belmont, 47% of renters are cost burdened compared with 21% of owners. **Nearly all of Belmont’s households earning 30% of AMI and less are burdened**, with the vast majority severely burdened (Figure IV-10, Attachment C.6). The level of burden diminishes greatly once households earn 80% of AMI and more.

²⁵ Cost burden and severe cost burden are HUD and industry standard metrics.

Cost burden varies across residents of different races and ethnicities. Black or African American households, mixed race households, and Hispanic households are most likely to face severe cost burden, with rates ranging from 25% to 30%. Asian households are the least likely to be severely burdened, at 9%. Overpayment also varies by household size. Belmont's large family households— households with five or more persons—are less likely to be cost burdened than other households. In fact, 79% of large households are not cost burdened compared to 66% of other households. Relatedly, only 21% of large family households are cost burdened while 34% of other households overpay for their housing.

Figures IV-13 and IV-14, Attachment C.6 show the geographic distribution of overpayment rates among homeowners and renters in Belmont. Although there are no highly concentrated areas of overpayment in the city, the largest portion of renters overpaying for their housing are concentrated in census tracts 6086 and 6089. In census tracts 6088 and 6090, 20% to 40% of renters are cost burdened. No census tract in Belmont has less than 20% of renters experiencing cost burden. Excluding census tract 6089 where less than 20% of homeowners overpay for their housing, all census tracts in Belmont show 20% to 40% of cost burdened owners. It is important to note that areas where renters are more likely to be cost burdened (census tract 6089) is the one location where the least number of homeowners overpay. As shown in Figure IV-29, Attachment C.6, census tract 6088 is one of the more expensive areas in the city—this census tract has the smallest proportion of overpaying homeowners.

Overcrowding. The vast majority of households (95%) in Belmont are not overcrowded—indicated by more than one occupant per room. See Figure IV-19 in Attachment C.6. Renter households make up the vast majority of the city's households living in overcrowded conditions. Asians and persons of Hispanic descent have much higher rates of overcrowding than others: 7.8% of Asian residents live in overcrowded conditions and 10% of Hispanic residents live in overcrowded conditions. These compare with 2.8% of non-Hispanic White residents.

By race and ethnicity, the city's Hispanic and mixed-race households are the most likely to be living in overcrowded conditions. Belmont has no geographic concentrations of overcrowded households, as shown in the map below. Belmont is similar to Foster City, Hillsborough, and Burlingame for overcrowding. Nearby City of San Mateo and San Carlos each have one tract with moderate overcrowding (8.3% to 12%).

Substandard Housing. Renter households are also more likely to have substandard kitchen and plumbing facilities compared to owner households. Of the city's renters, 6.6% are lacking kitchen facilities, while less than 1% are lacking plumbing. For owners, less than 1% are lacking either kitchen or plumbing facilities. Rates of substandard housing in Belmont are relatively low, however, city residents do face housing condition challenges outside of the four substandard housing conditions identified by HUD. The condition of the city's housing stock is explained in greater detail above.

As noted in the Housing Needs Appendix, a summary of the most common code enforcement activity provided by the Code Enforcement Officer includes residential yard and tree maintenance, illegal dumping, construction without permits, abandoned/inoperable vehicles, smoking in multi-family residential units (prohibited in Belmont), trash and debris in public view, rodent infestation and dilapidated property fences. None of these frequent violation types provides insight into the estimated number of housing units in need of rehabilitation. Additionally, the code enforcement officer has confirmed that estimating rehabilitation needs based on age of housing stock is a reasonable measure. There do not appear to be any visual housing stock trends (i.e. boarded up windows/doors, roof or other structural damage, significant external damage) in Belmont that would guide housing rehabilitation needs/services.

Homelessness. In 2019, 1,512 people were experiencing homelessness in the county, 40% of people were in emergency or transitional shelter while the remaining 60% were unsheltered. The majority of unsheltered people experiencing homelessness were in households without children. The majority of people in transitional housing were in households with children. **People who identified as American Indian or Alaskan Native (6% homeless but represent less than 1% of the 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. 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.

The City has no local data on homelessness to the extent needed for this analysis because it was not collected during the last homeless count. That said, the City is an active participant in the 21 Elements group as well as the Countywide CoC. In addition, the Housing Element Implementation Plan contains actions to ensure that transition housing, supportive housing, and shelters are permitted in every zoning district where housing is allowed.

Displacement and Retaining Assisted Units. Belmont has 106 low-income affordable units at risk of converting to market rate units. The risk of these units converting to market rate is low, however, according to the California Housing Partnership. Low risk is defined as units that are at risk of converting in a longer timeframe (10+ years) and which are currently owned by a large and/or stable nonprofit, mission-driven developer.

According to the Urban Displacement Project, three census tracts in the city—two abutting Highway 101 and one abutting Highway 280—are at risk of “becoming exclusive.” This is based on a large rise in the home value and rent change in the census tracts between 2012 and 2018. These tracts also have high shares of renter households. As shown in Figure IV-28, Attachment C.6, there are two census tracts in Belmont that are considered at risk of displacement—census tract 6089 and part of census tract 6086.

Findings from the 21 Elements Resident Survey support census tract data from the Urban Development Project. Survey results indicate that Belmont faces greater risks of displacement than the overall region. Overall, 21% of respondents reported that they had been displaced from their housing in the past five years. Comparatively, 29% of Belmont respondents reported being displaced. Top reasons for displacement in Belmont include apartment rules (30%), rent increased more than they could pay (25%), and landlord refused to renew their lease (25%). Residents displaced from rent increases will likely continue if home values and rent changes follow patterns between 2012 and 2018.

Of all households in Belmont that reported being displaced in the resident survey, 45% of children had to change schools. This is a lower rate than the county overall where 60% of children in displaced households had to change schools. Despite having a lower rate, displacement is a major challenge for children and heavily influences education outcomes. According to the survey, displaced children in Belmont experienced negative outcomes from changing schools. Top school change outcomes reported by Belmont respondents include: they are in a worse school (44%), the school is more challenging (33%), and they feel less safe at their new school (33%).

Displacement can occur due to natural disasters (e.g., flooding, wildfires) as well. According to the 2012 Flood Insurance Rate Map (FIRM)—adopted by the Federal Emergency Management Agency (FEMA)—flooding hazards generally follow Belmont Creek. To reduce flooding hazards in areas surrounding Belmont Creek, the city had adopted a stormwater management program and additional regulations related to floodplain management. These regulations were adopted and integrated in the city's Municipal Code (Sections 7-201 through 7-222).

To assist displaced residents, the city is considering an anti-displacement policy and housing preference policy. The housing preference policy will prioritize residents applying for housing that have been displaced from a unit in the past three years. Belmont is also working towards establishing foreclosure avoidance programs, an eviction prevention ordinance, and increased funding for fair housing legal services. There is a need for additional preservation and anti-displacement efforts. These efforts should focus on units located near Highway 101 to facilitate access to services, transit, employment, and quality education in the city and surrounding areas.

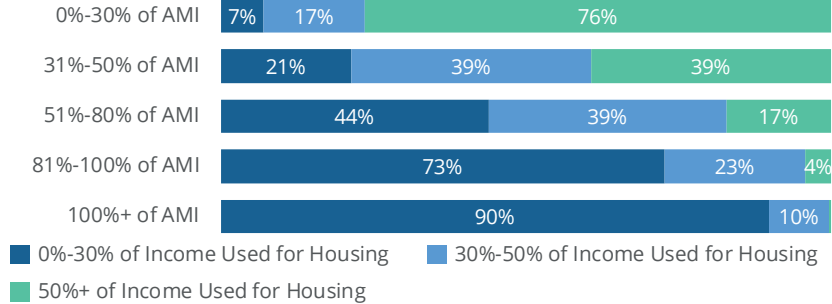
Access to mortgage loans. Disparities by race and ethnicity are also prevalent for home mortgage applications, particularly in denial rates. **Hispanic mortgage loan applicants (29% denial rate), American Indian or Alaska Native households (33% denial rate), and Black or African American households (27% rate) had the highest denial rates for mortgage loan** applications in 2018 and 2019. These compare to 14% for Asian applicants and 20% for White applicants.

Disproportionate Housing Needs

Cost Burden, Belmont, 2019



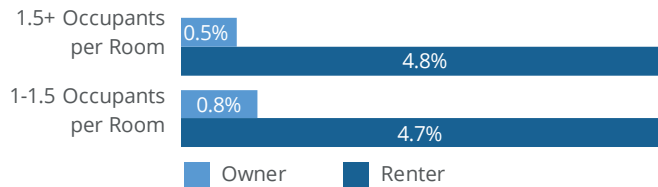
Area Median Income (AMI)



Overcrowding, Belmont, 2019



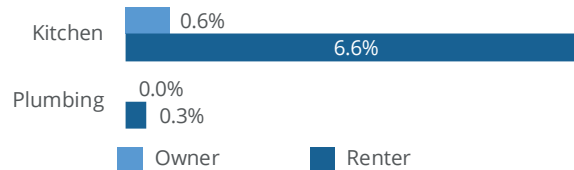
Occupants per Room by Tenure



Substandard Housing, Belmont, 2019



Incomplete Kitchen and Plumbing Facilities by Tenure



Homelessness, San Mateo County, 2019



Race and Ethnicity

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, Belmont, 2019



Assisted Units at High or Very High Risk of Displacement

	Belmont	San Mateo County
Number of Units	0	417
% of Assisted Units	0%	8%

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.

Census Tract Sites Analysis

The City's proposed RHNA sites can accommodate approximately 1,176 new units and 1,023 pending and pipeline units. Table C-1 shows the distribution of those units across Census Tracts, in addition to the proportion of the population that identifies as Hispanic, the non-White share of the population, the share of low and moderate-income households, the number of R/ECAPS and RCAAs, TCAC's opportunity score for all Census Tracts in the city. Figure 2 shows the distribution of the City's proposed sites geographically.

Census Tract 6086

Characteristics. Census Tract 6086 is located east of CA-82 adjacent to Redwood City and Foster City to the east. The area is predominantly commercial uses along CA-82 and Highway 101. There are several lower density single-family neighborhoods and large apartment communities within the Tract. St. Mark Catholic Church, Nesbit Elementary School, various hotels, and a Caltrain Station are also located within this Census Tract. According to TCAC's opportunity area map, the Census Tract is a high resource area. There is a moderate share of low or moderate-income households (37% of households in the Tract). The majority of the population in this Tract are non-White (62%) and one in five (20%) identify as Hispanic. The Tract is not an R/ECAP or RCAA and is rated lower displacement risk under the Urban Displacement, Estimated Displacement Risk designations.

Assessment. The addition of 958 site inventory units including 344 for low and moderate-income (LMI) households may contribute to existing concentrations of non-White and LMI households in Belmont. However, Belmont as a whole is less diverse than San Mateo County overall. The demographics of this Census Tract are similar to the larger County. Neighborhoods in this area are established and provide opportunities for mixed-income households—characterized by stable moderate/mixed-income by the Urban Displacement typologies. The introduction of affordable units for low-income households could help prevent the Tract from gentrification and displacement. **The addition of 44% of the City's proposed units within this Census Tract may modestly raise the overall proportion of low and moderate-income households within this Tract. However, these sites also provide access to the high resource areas and transportation as well as help to prevent displacement of renters from the Downtown area.**

Considerations. 958 site inventory units are proposed in Census Tract 6086, including 345 units for LMI households and 613 units for above moderate-income households, 633 of which are pipeline units.

Census Tract 6087

Characteristics. Census Tract 6087 is located between the City's border to the north, CA-82 to the east, Ralston Avenue to the south, and Alameda de las Pulgas to the west. The area is predominantly low density single-family with commercial uses along CA-82 to the east. Barrett Community Center, Notre Dame High School, Notre Dame Elementary School, Notre Dame de Namur University, and several community parks are also located within this Census Tract. Generally, the Census Tract is ranked as a highest resource area according to the TCAC's opportunity areas and contains a moderate share of low- or moderate-income households (31% of households in the Tract). The majority of the population in this Tract are non-White (53%) and 12% identify as Hispanic. Finally, the Tract is not an R/ECAP and is rated lower displacement risk under the Urban Displacement, Estimated Displacement Risk designations.. This Census Tract is an RCAA.

Assessment. The addition of 785 site inventory units, including 518 for LMI households, will help stabilize this area and provide continued opportunities for LMI households to live in this highest resource Census Tract. Neighborhoods in this area are at risk of becoming exclusive, as characterized by the Urban Displacement definitions. The introduction of affordable units for low-income households in this at-risk area could help prevent the Tract from gentrification and displacement. The addition of 36% of the City's total proposed units within this Census Tract may modestly raise the overall proportion of low and moderate-income households within this Tract. However, this Census Tract is an RCAA and highest resource area that is at-risk of becoming exclusive. Integrating additional housing units in this area is imperative to stabilize the neighborhood and prevent it from becoming exclusive.

Considerations. 785 site inventory units are proposed in Census Tract 6087, including 518 for LMI households and 267 units for above moderate-income households, 186 of which are pipeline units.

Census Tract 6088

Characteristics. Census Tract 6088 is located between the City's border to the north, Alameda de las Pulgas to the east, Ralston Avenue to the south, and the City's border to the west. The area is entirely very low density single-family, open space, and neighborhood uses. Cipriani Elementary School, dog park, San Juan Canyon Open Space, and Fellowship Bible Church are also located within this Census Tract. Generally, the Census Tract is ranked as a highest resource area according to the TCAC's opportunity areas and contains the lowest share of LMI households (14% of households in the Tract) compared to other Tracts in the City. Less than half of the population in this Tract is non-White (44%) and 8% identify as Hispanic. Finally, the Tract is not an R/ECAP and is rated lower displacement risk under the Urban Displacement, Estimated Displacement Risk designations. This Census Tract is an RCAA.

Assessment. Only 14 site inventory units including 11 for LMI households are proposed in this Census Tract. Neighborhoods in this area are established and unaffordable to low-income households—characterized by stable advanced exclusive by the Urban Displacement definitions. **The introduction of affordable units for low-income households in this exclusive Census Tract will further integrate the City of Belmont.** However, the addition of >1% of the City’s total proposed units within this Census Tract is not likely to change existing demographics of the Tract substantially. These sites will provide access to the highest resource areas and would further integrate this RCAA.

Considerations. 14 site inventory units are proposed in Census Tract 6088, including 11 units for LMI households and 3 units for above moderate-income households, all of which are pipeline units.

Census Tract 6089

Characteristics. Census Tract 6089 is located between Ralston Avenue to the north, Alameda de las Pulgas to the east, and the City’s border to the south and west. The western portion of this Census Tract is low density residential and open space. Conversely, the eastern portion of the Tract is primarily apartment complexes. San Mateo County Human Services, Fox Elementary, Ralston Middle School, Carlmont High School, and Belmont Public Library are also located within this Census Tract. Generally, the Census Tract is a highest resource area according to the TCAC’s opportunity areas and contains the highest share of LMI households (39% of households in the Tract) compared to other Tracts in the City. More than half of the population in this Tract is non-White (52%) and 9% identify as Hispanic. Finally, the Tract is not an R/ECAP or RCAA and is rated lower displacement risk under the Urban Displacement, Estimated Displacement Risk designations.

Assessment. There are no site inventory units proposed in this Census Tract. Neighborhoods in this area are established and provide opportunities for mixed-income households—characterized by stable moderate/mixed-income by the Urban Displacement definitions.

Considerations. There are no site inventory units in Census Tract 6089.

Census Tract 6090

Characteristics. Census Tract 6090 is located between Ralston Avenue to the north, CA-82 to the east, the City’s border to the south, and Alameda de las Pulgas to the west. The area is predominantly low-density single-family with commercial uses along CA-82 to the east and apartments along Alameda de las Pulgas to the west. Charles Armstrong School, Twin Pines Park, Silverado Belmont Hills Memory Care, and McDougal Park are also located within this Census Tract. Generally, the Census Tract is a highest resource area according to the TCAC’s opportunity areas and contains a moderate share of low- or moderate-income households (29% of households in the Tract). The majority of the population in this Tract are non-White (51%) and 15% identify as Hispanic. Finally, the Tract is not an R/ECAP

and is rated lower displacement risk under the Urban Displacement, Estimated Displacement Risk designations. This Census Tract is an RCAA.

Assessment. **The addition of 339 site inventory units including 216 for LMI households would help maintain the Tract as mixed-income and further integrate the City of Belmont.** Neighborhoods in this area are established and provide opportunities for mixed-income households—characterized by stable moderate/mixed-income by the Urban Displacement definitions. **The introduction of affordable units for low-income households could help prevent the Tract from gentrification and displacement.** The addition of 19% of the City's proposed units within this Census Tract will help maintain the current income distribution of the Census Tract and continue to provide opportunities for mixed-income households to live in this RCAA and highest resource area.

Considerations. 339 site inventory units are proposed in Census Tract 6090, including 216 for LMI households and 123 units for above moderate-income households, 87 of which are pipeline units.

Census Tract 6091

Characteristics. Census Tract 6091 is only partially located in the City of Belmont, and the majority of the Tract is in San Carlos covering the downtown area. The area is almost entirely commercial uses between Highway 101 and CA-82. There are a handful of RHNA sites in this Tract near the single-family residential neighborhood between Ralston Avenue and O'Neil Avenue in Belmont. Generally, the Census Tract is a high resource area according to the TCAC's opportunity areas and contains a moderate share of low- or moderate-income households (34% of households in the Tract). The majority of the population in this Tract are non-White (54%) and one out of three identify as Hispanic. Finally, the Tract is not an R/ECAP and is rated lower displacement risk under the Urban Displacement, Estimated Displacement Risk designations. This Census Tract is an RCAA.

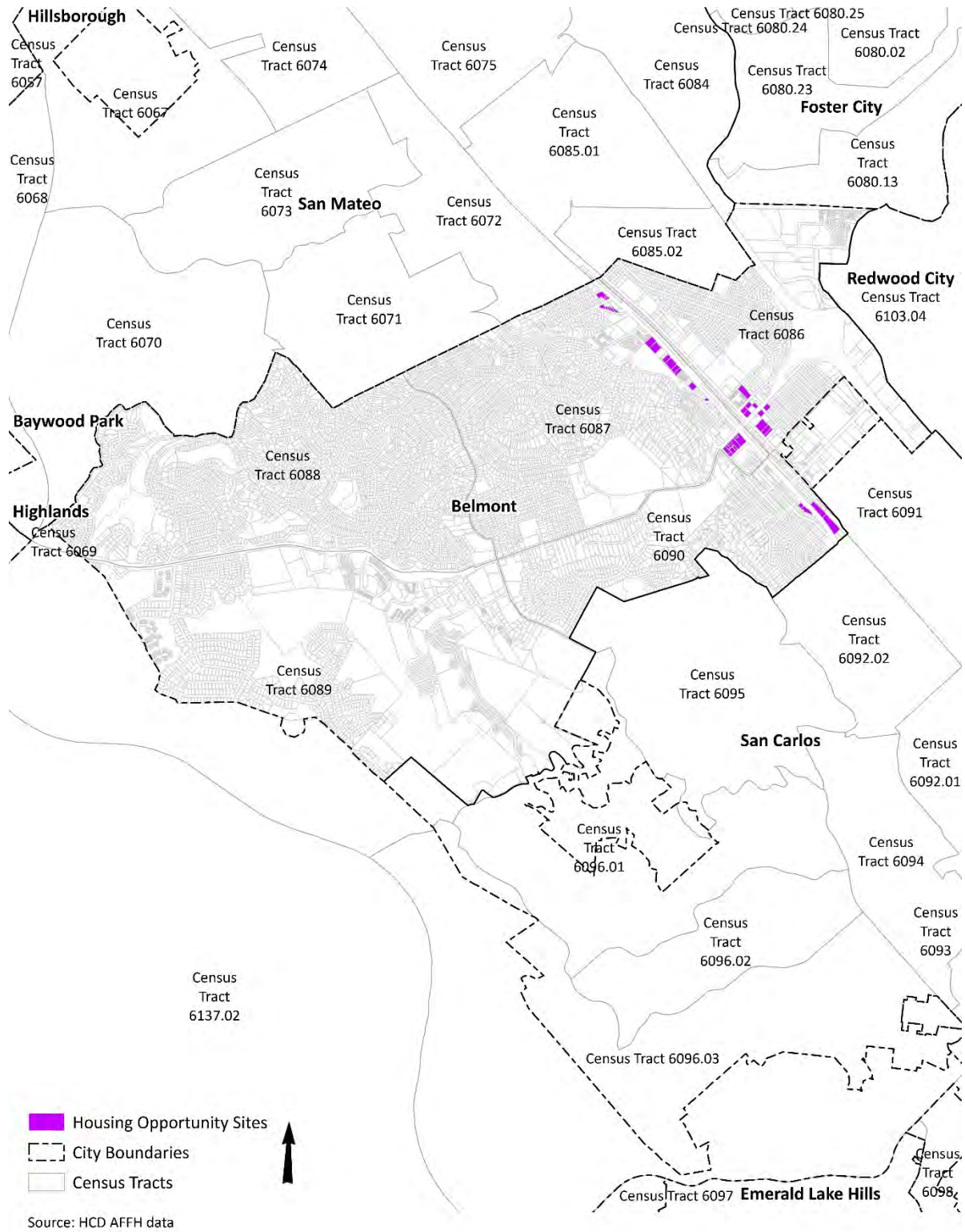
Assessment. The addition of 103 site inventory units, including 16 for LMI households, would help maintain the Tract as mixed-income and further integrate the City of Belmont. Neighborhoods in this area are established and provide opportunities for mixed-income households—characterized by stable moderate/mixed-income by the Urban Displacement definitions. **The introduction of affordable units for low-income households could help prevent the Tract from gentrification and displacement.**

Considerations. 103 site inventory units are proposed in Census Tract 6091, including 16 units for LMI households and 87 units for above moderate-income households, all of which are pipeline units.

TABLE C-1. BELMONT PROPOSED RHNA SITES BY CENSUS TRACT SUMMARY

Census Tract	AFFH Data							Sites Inventory Units				
	Pct. Hispanic	Pct. Non-White	Pct. Low/Mod Income	R/ECAP	RCAA	TCAC Opportunity Areas	Urban Displacement	Very Low	Low	Moderate	Above Moderate	Total
Census Tract 6086	20%	62%	37%	0	0	High Resource	Lower Displacement Risk	152	128	65	613	958
Census Tract 6087	12%	53%	31%	0	1	Highest Resource	Lower Displacement Risk	249	168	101	267	785
Census Tract 6088	8%	44%	14%	0	1	Highest Resource	Lower Displacement Risk	0	0	11	3	14
Census Tract 6089	9%	52%	39%	0	0	Highest Resource	Lower Displacement Risk	0	0	0	0	0
Census Tract 6090	15%	51%	29%	0	1	Highest Resource	Lower Displacement Risk	115	60	41	123	339
Census Tract 6091	31%	54%	34%	0	1	High Resource	Lower Displacement Risk	0	16	0	87	103

Figure C-2. Belmont Census Tract Map



Supportive Citywide Spatial Analysis

The following series of maps provide the location of proposed Belmont RHNA sites overlaid on demographic and fair housing data provided in HCD's AFFH data viewer.

Hispanic Population

Figure C-3 shows proposed RHNA sites overlaid with the percentage of the population that identifies as Hispanic for Census Block Groups in the City. Two block groups have higher than 20% of the population identified as Hispanic. There are only a small handful of proposed RHNA sites within the block group just north of Ralston Avenue within Census Tract 6087. Overall, the City of Belmont (12%) has a substantially smaller Hispanic population compared to San Mateo County as a whole (24%).

Non-White Population

Figure C-4 shows proposed RHNA sites overlaid with the share of the population that identifies as non-White by Census Tract in the City of Belmont. All Census Tracts within the City have between 44% and 62% of the population non-White. Census Tract 6086 located east of CA-82 has the highest share of non-White residents (62% of the population). Forty-seven percent (47%) of site inventory units are proposed in this Census Tract. This proportion of non-White residents is similar to San Mateo County as a whole (61%). The second highest share of non-White residents by Census Tract is in Tract 6091 (54%) which is the location of 5% of proposed site inventory units. Overall, Belmont has a lower share of non-White population when compared to San Mateo County with 56% of the population being non-Hispanic White in Belmont compared to 61% in the county.

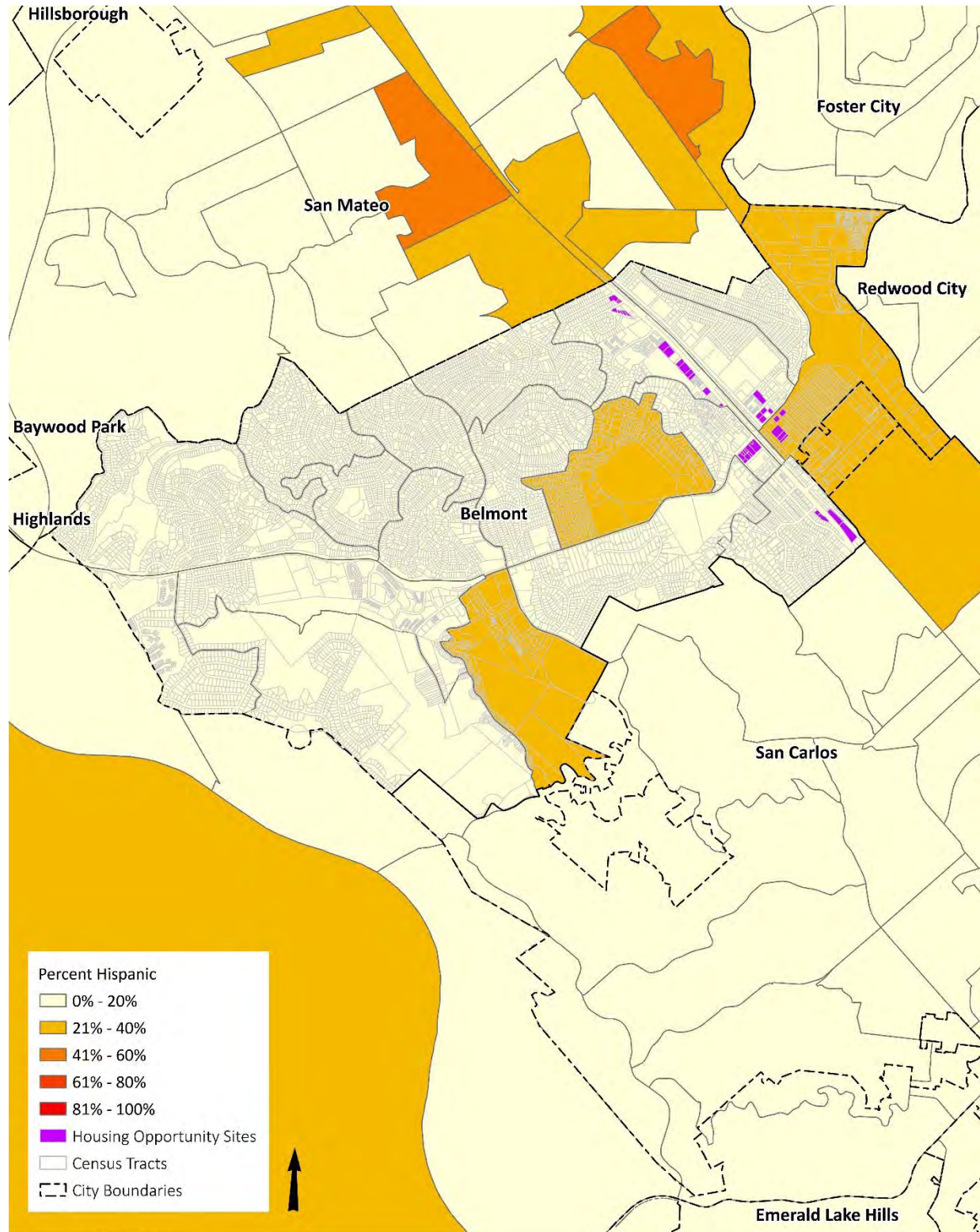
Low- and Moderate-Income

Figure C-5 shows proposed RHNA sites overlaid with the share of households that are low- and moderate-income in the City of Belmont by Census Tract. Census Tract 6089 has the highest proportion of LMI households (39%) but has no proposed LMI site inventory units. Census Tract 6086 has the second highest proportion of LMI households compared to other Census Tracts in the City with 37% LMI households. This proportion of LMI households is similar to the income distribution of San Mateo County as a whole (40% LMI households).

Census Tract 6086 is the location of 44% of the proposed site inventory units and is predominantly commercial uses along CA-82 and Highway 101. There are several lower density single-family neighborhoods and large apartment communities within the Tract. St. Mark Catholic Church, Nesbit Elementary School, various hotels, and a Caltrain Station are also located within this Census Tract.

The lowest proportion of LMI households is within Census Tract 6088 (14%) which is the location of >1% of proposed site inventory units scattered throughout the residential neighborhoods.

Figure C-3. Belmont Proposed RHNA Sites, Percent Hispanic, 2019



Source: HCD AFFH data

Figure C-4. Belmont Proposed RHNA Sites, Percent Non-White, 2019

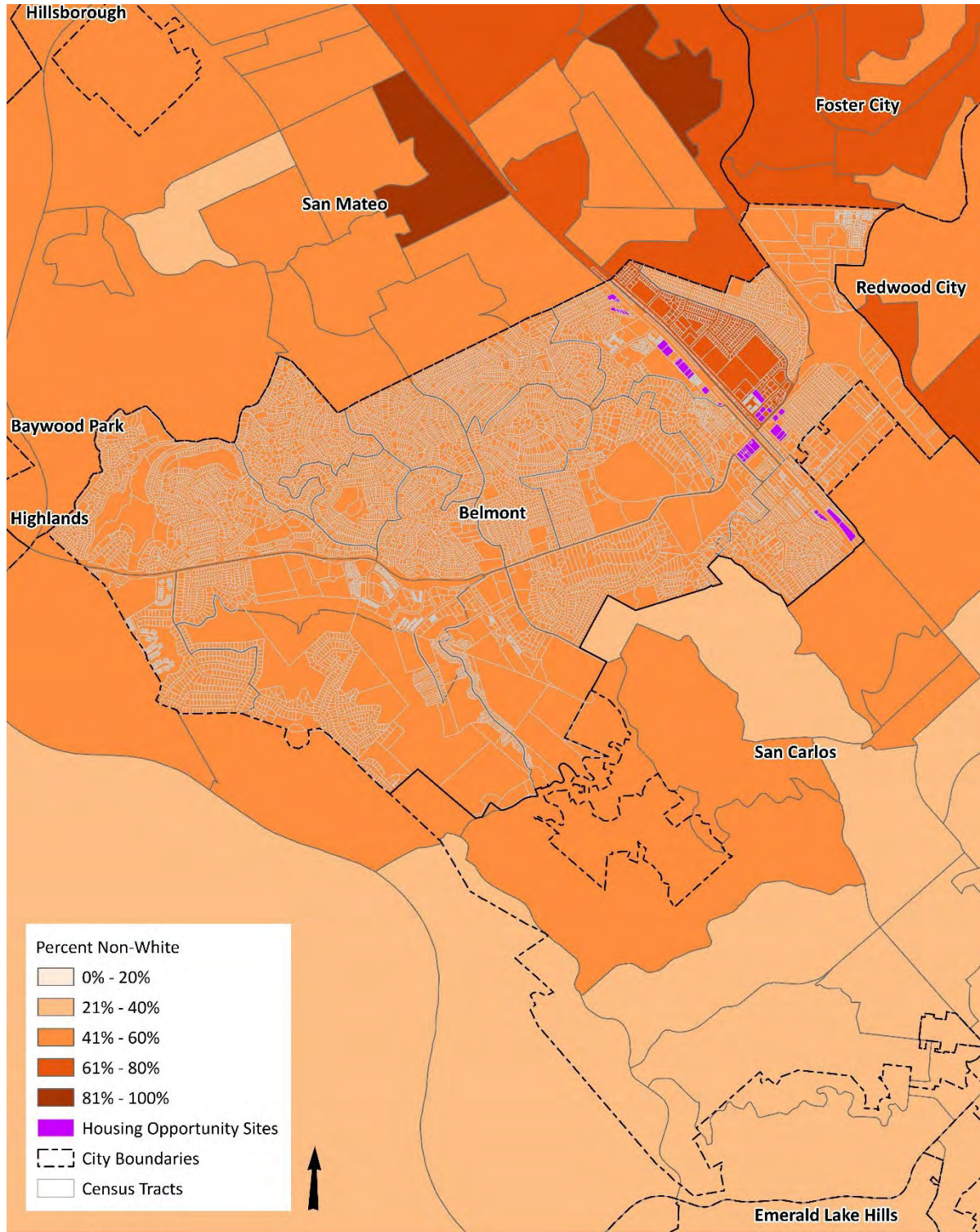
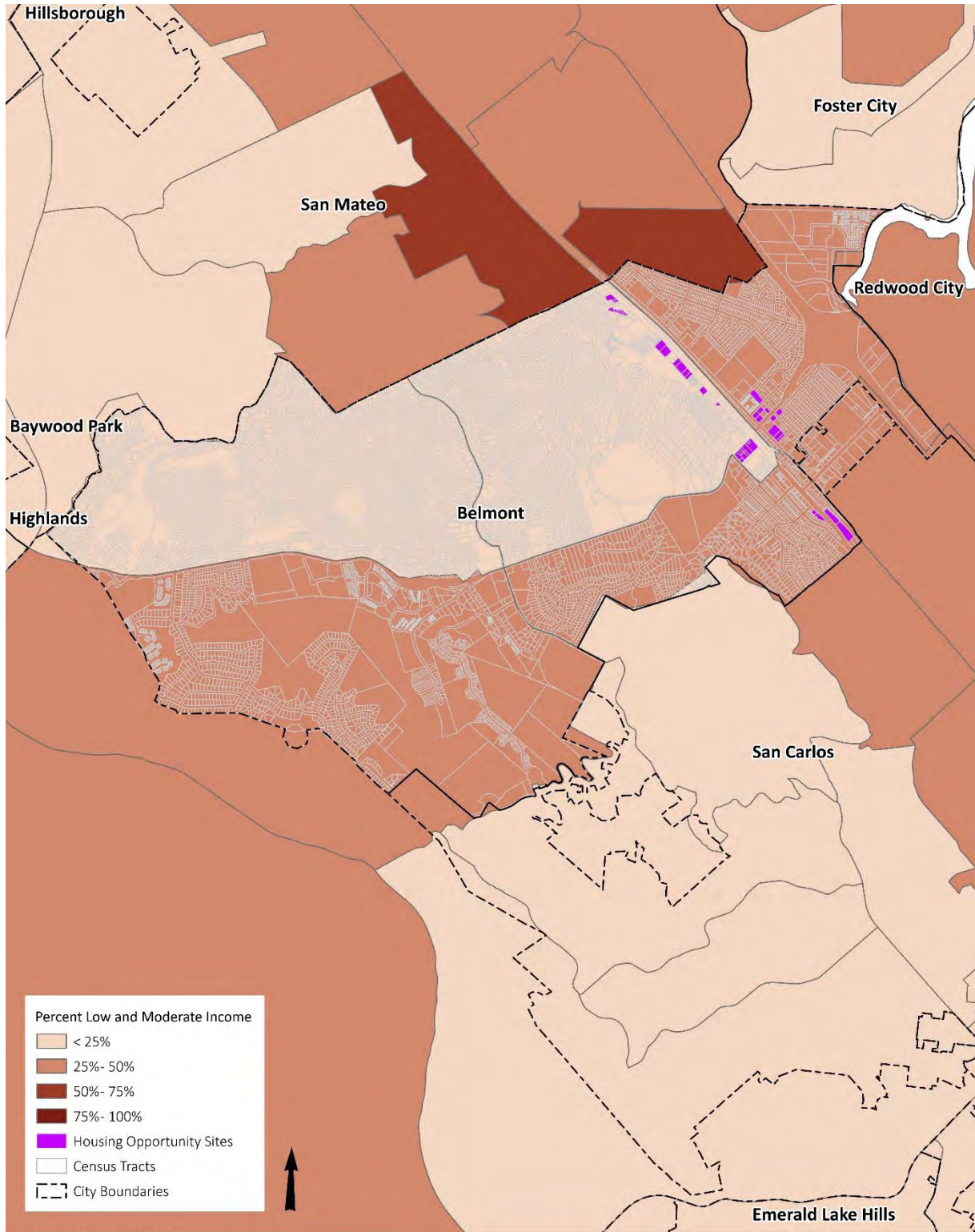


Figure C-5. Belmont Proposed RHNA Sites, Percent Low- and Moderate-Income, 2019



Racially or Ethnically Concentrated Areas of Poverty (R/ECAP)

As shown in Figure C-6, there are no R/ECAPs in the City of Belmont.

Racially Concentrated Areas of Affluence (RCAA)

Figure C-7 shows RCAAs in Belmont. As shown in the figure, the majority of the City is an RCAA except for Census Tracts 6086 and 6089. **Nearly half (44%) of proposed site inventory units are located within RCAAs and further integrate the City of Belmont racially and economically.**

TCAC Areas of Opportunity

Figure C-8 shows the opportunity area designation for each Census Tract in the City based on TCAC's resource areas. The majority of the City of Belmont is a highest resource area except for Census Tracts 6086 and 6091. **All RHNA sites are located in areas that are designated as high or highest resource. Therefore, the proposed site locations will provide access to opportunity to LMI households living in the region.**

Urban Displacement

Figure C-9 shows the Urban Displacement typology assigned to each Census Tract in the City of Belmont. Most Census Tracts are considered stable moderate/mixed-income. These Census Tracts (6086, 6089, 6090, and 6091) contain 64% of proposed site inventory units. These areas are already mixed-income areas. **Therefore, the introduction of additional mixed-income units will help maintain the area's existing income diversity.**

Census Tract 6087 is classified as at-risk of becoming exclusive. Thirty-six percent (36%) of proposed site inventory units are located in this Census Tract and should help stabilize the area and prevent displacement. Finally, >1% of units in Tract 6088 which is classified as stable/advanced exclusive meaning that low- and moderate-income households have minimal access to live in these neighborhoods. The introduction of 14 units in these neighborhoods will further integrate the City.

Figure C-6. Belmont Proposed RHNA Sites, R/ECAPs, 2023

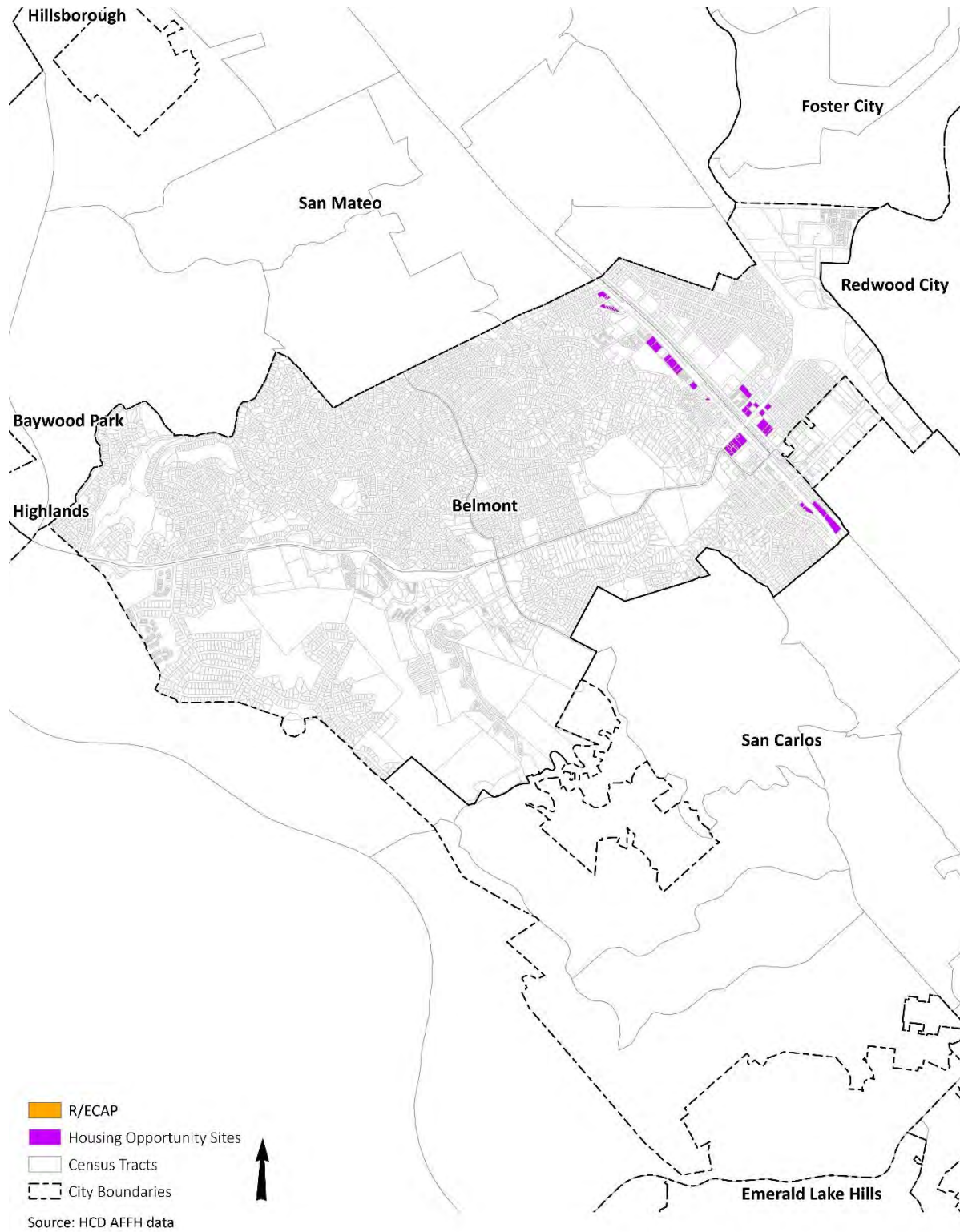


Figure C-7. Belmont Proposed RHNA Sites, RCAAs, 2019

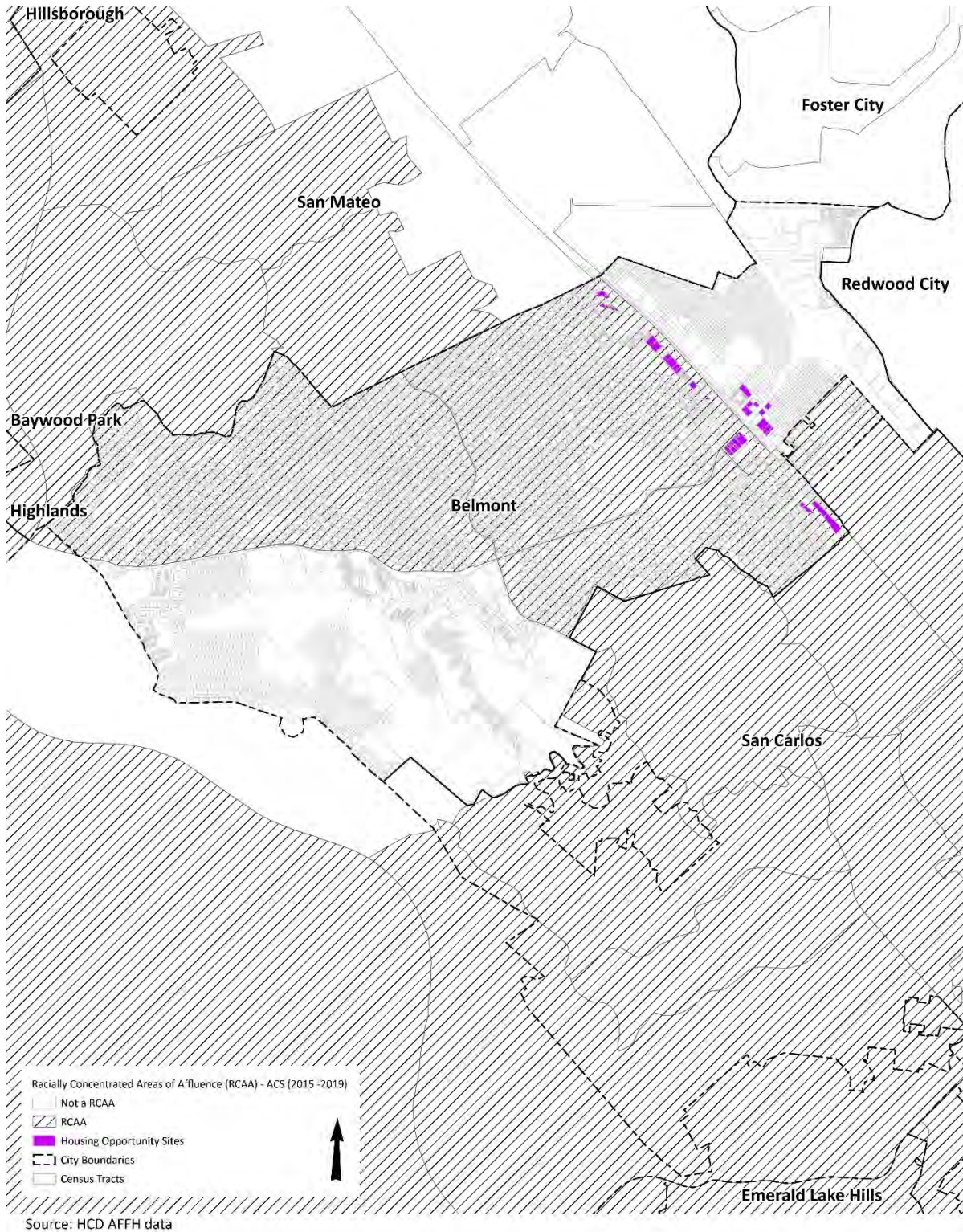


Figure C-8. Belmont Proposed RHNA Sites, TCAC Areas of Opportunity, 2023

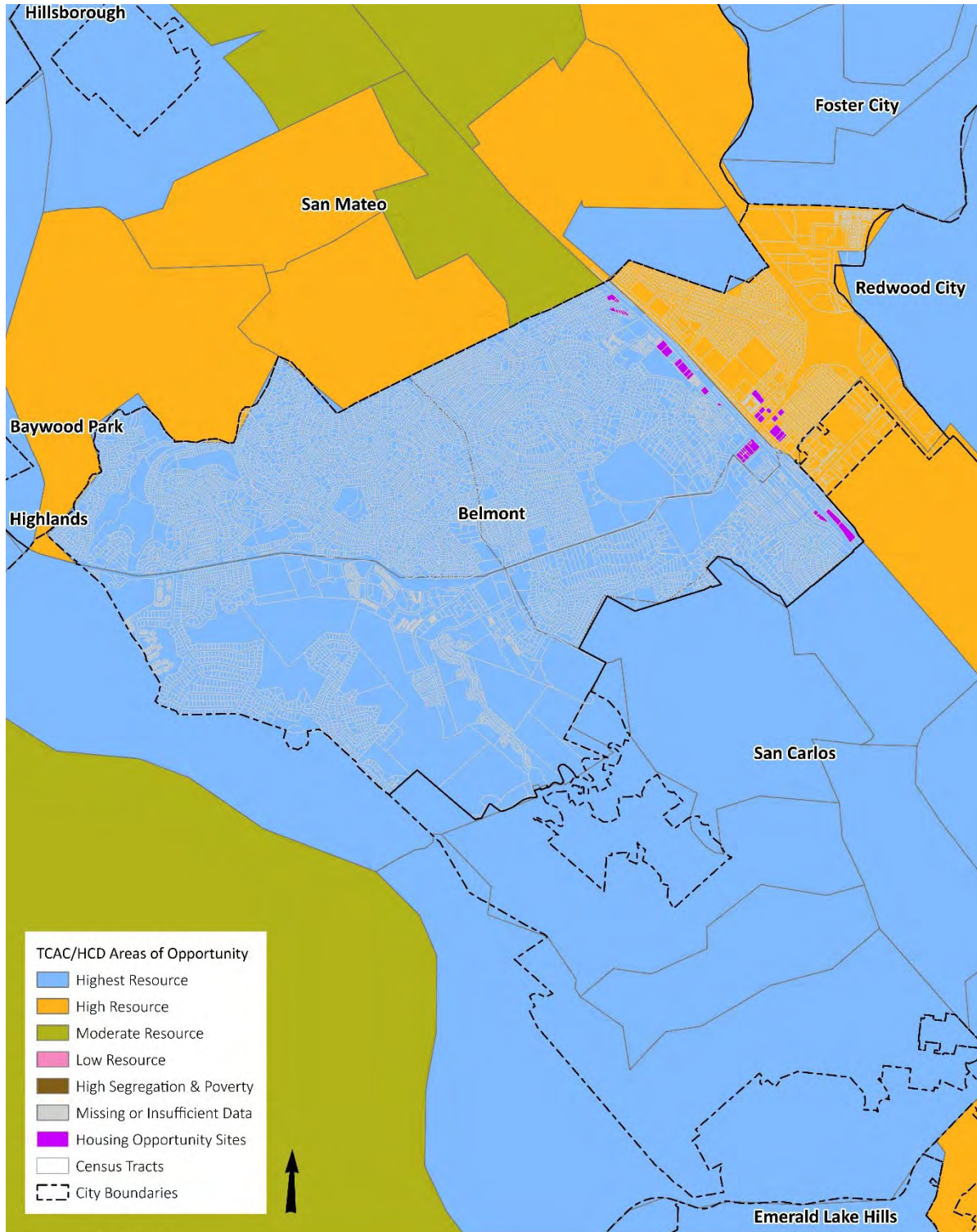
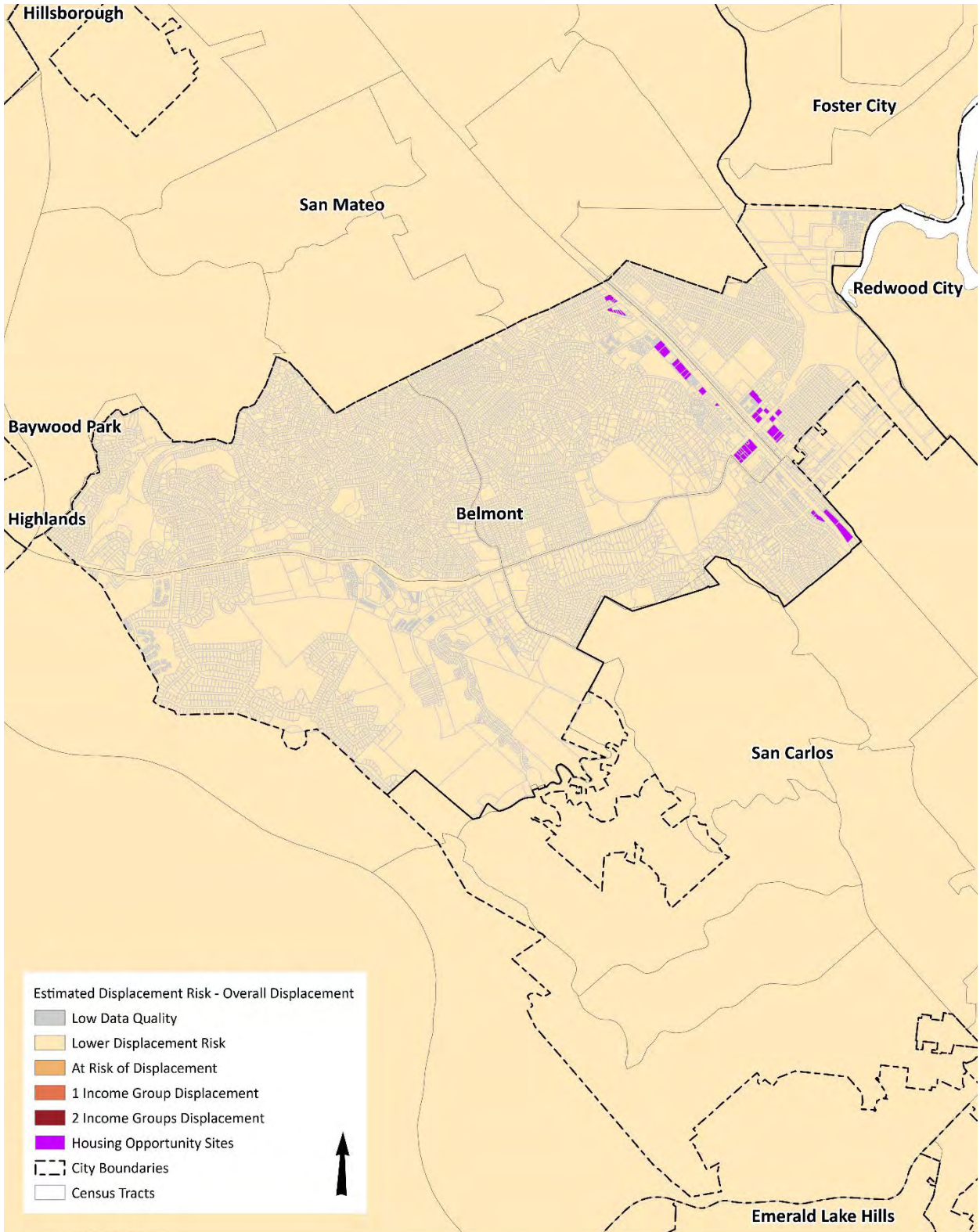


Figure C-9. Belmont Proposed RHNA Sites, Urban Displacement, 2023



Source: HCD AFFH data

Segregation and Integration

Belmont has proportionately fewer residents of color than the county and the Bay Area overall, although the City's Asian population is on par with the proportion in the County and Bay Area. Fifty-four (54%) percent of Belmont residents are White, non-Hispanic versus 39% of the County and the Bay Area overall. Twelve percent (12%) of Belmont residents are Hispanic, compared to 24% in the County and the Bay Area overall.

The City's proposed distribution of site inventory units does not generally concentrate LMI units in areas with high non-White or Hispanic populations. However, the 345 LMI units proposed in Tract 6086 may contribute to concentrating non-White and LMI households in the downtown area east of CA-82 if non-White or Hispanic residents disproportionately occupy the new units. This area differs from more typically concentrated areas in that it does not have high rates of poverty and is not an R/ECAP. In fact, HCD indicators show this area as a high resource area and close to public transportation. **Additionally, providing units in this Census Tract for low- and moderate-income households would help stabilize households in the area and prevent further displacement of renter households.**

The share of non-White households in this Census Tract is on par with the Countywide distribution—62% and 61% respectively. Similarly, the proportion of LMI households in this Tract is 37% compared to 40% in San Mateo County. **Furthermore, the mapping completed by the state to support this study suggests that these moderately-concentrated neighborhoods offer similar access to jobs, good schools, and positive environmental outcomes as other parts of Belmont.**

A supplemental analysis of existing LMI households by Tract and proposed site inventory unit allocations shows that Tracts 6086 and 6091 would experience a slight decrease in LMI households as a proportion of total households by addition of the units; this is because the addition of the affordable units is balanced by the addition of market rate units. Conversely, Tracts 6087 and 6090 would experience an increase in the proportion of LMI households of six and seven percentage points, respectively. This increase in LMI households brings Tracts 6087 and 6090 to 37% and 36% LMI households, respectively. This proportion of LMI households is less than the countywide share of 40% in San Mateo County.

Racially and Ethnically Concentrated Areas of Poverty and Affluence

None of the proposed units are within an R/ECAP. Racially Concentrated Areas of Affluence (RCAAs) are defined by HUD as communities with a large proportion of affluent and non-Hispanic White residents. The majority of Belmont is within an RCAA. Forty-four percent (44%) of site inventory units are within an RCAA, which provide access to opportunity for residents of affordable housing and reduce existing segregation patterns. **These sites**

provide increased housing opportunities for all incomes and would not exacerbate concentrations of race and affluence.

Disparities in Access to Opportunity

The majority of the City of Belmont is a highest resource area except for Census Tracts 6086 and 6091. More than half (52%) of proposed site inventory units are in highest resources areas and 48% are in high resource areas. **Because Belmont is classified as a high resource area throughout and lacks major racial and ethnic concentrations, the distribution of residents among high resource areas matches the city's racial and ethnic distribution.** Additionally, all site inventory units will provide access to high resource areas for LMI households living in the region.

Disproportionate Housing Needs

Racial and ethnic minority populations in Belmont—with the exception of Asians—are more likely to be living in poverty and be housing cost burdened compared to the non-Hispanic White population. They are also slightly more likely to be denied a mortgage loan. Hispanic households have much higher rates of cost burden—48% are burdened and 25% severely burdened—and one in ten lives in an overcrowded household. **The locations of the proposed RHNA sites do not directly exacerbate the segregation of any of these racial or ethnic groups because the city has a lower proportion of non-White households compared to San Mateo County as a whole.**

SECTION VI. Contributing Factors and Fair Housing Action Plan

Note that the Fair Housing Action Plan is also included in *Chapter 3: Affirmatively Furthering Fair Housing Summary*, to ensure implementation and ongoing monitoring.

TABLE 3-1: FAIR HOUSING ACTION PLAN

Fair Housing Issue	Contributing Factors	Priority Level	Meaningful Program Actions (from Chapter 7, Goals, Policies, and Programs)	Targets and Timeline
Lack of fair housing complaints filed.	Lack of access to information about fair housing rights. Limited knowledge of fair housing by residents.	High	<ul style="list-style-type: none"> ▪ H5.1: Update Website to Improve Access to Fair Housing Information and Housing Services. 	<ul style="list-style-type: none"> ▪ Complete best practices review by Q1 2025. ▪ Complete website update by Q2 2025, update quarterly thereafter.
Very high rates of cost burden for <50% AMI households and Black and Hispanic households; high rates of overcrowding among Asian households.	Lack of affordable housing citywide; low housing production.	High	<ul style="list-style-type: none"> ▪ H5.2: Coordinate with other jurisdictions and agencies in the County to advance AFFH goals ▪ H5.3: Modify the Inclusionary Housing Program. ▪ H5.4: Work with Housing Developers to Affirmatively Market Housing to Households with Disproportionate Housing Needs. ▪ H5.6: Expand Tenant Protections ▪ H5.7: Continue Financial Support of Existing Home Sharing Program. 	<ul style="list-style-type: none"> ▪ Attend regular meetings with 21 Elements, 21 Directors and Housing Managers group. ▪ Collaborate with peer jurisdictions to implement Housing Element Programs that would benefit from efficiencies of scale. ▪ Complete feasibility analysis by Q4 2025; Implement redesigned program by Q1 2026. ▪ Establish list of service providers by Q4 2024 and update annually thereafter. ▪ Ongoing as projects are processed, review developer marketing plans to ensure affirmative marketing is included. ▪ In Q4 2025, draft extended tenant protections provisions and research policy provisions for substantial remodel exemptions and right of return policies. ▪ Bring recommended language to City Council in Q1 2026. Conduct proactive outreach to tenants and tenant groups bi-annually. ▪ City will grant funding as part of annual budget process. ▪ Meet with HIP Housing within one year of Housing Element Certification and annually thereafter.

Fair Housing Issue	Contributing Factors	Priority Level	Meaningful Program Actions (from Chapter 7, Goals, Policies, and Programs)	Targets and Timeline
			<ul style="list-style-type: none"> ▪ H5.8: Facilitate Development of Housing on Institutional Properties. ▪ H5.9: Amend Zoning Code to Facilitate Production of ADUs and SB9 units. ▪ H5.10: Provide Financial Support for ADUs that Serve Lower-Income Households. ▪ H5.11: Conduct Outreach to Encourage ADU and SB9 Unit Production. ▪ H5.12: Create an AFFH Monitoring Program. 	<ul style="list-style-type: none"> ▪ Reach out to each religious institution site owner or operator within one year following Housing Element certification and annually thereafter. ▪ Provide mailed notifications to religious institutions within six months of the adoption of any new State legislation that reduces barriers to development of religious institution sites. ▪ Reach out to each private school site owner or operator within one year following Housing Element certification and annually thereafter. ▪ Complete zoning ordinance amendments and establish policies and procedures to facilitate these types of projects within one year following Housing Element Certification. ▪ Participate in Countywide process in 2024. ▪ Establish a grant or loan program by Q4 2025. ▪ Conduct analysis and outreach related to units on sloped sites in Q2 2025. ▪ Join ADU Resource Center and launch online plans gallery in Q3 2024. ▪ Create new outreach materials in Q1 2025. ▪ Conduct outreach to all ADU/JADU/SB9 owners within 9 months of Housing Element Certification and annually thereafter. ▪ Create a list and map of existing ADUs, JADUs and SB9 units within six months of Housing Element adoption. ▪ Participate in regional process to establish an ADU monitoring program on timing they set forward. ▪ If ADU production does not meet target, consider additional efforts such as reducing process and permitting fees to incentivize production in 2027.

Fair Housing Issue	Contributing Factors	Priority Level	Meaningful Program Actions (from Chapter 7, Goals, Policies, and Programs)	Targets and Timeline
Persons with disabilities and persons of color are most likely to file fair housing complaints with HUD.	Lack of accessible affordable units; housing discrimination.	Medium	<ul style="list-style-type: none"> ▪ H5.5: Provide Fair Housing Training for Landlords and Tenants. 	<ul style="list-style-type: none"> ▪ Ongoing annual check in with Project Sentinel. ▪ Provide training in 2025 and every two years thereafter.

Source: City of Belmont, 2024.

AFFH Attachment C.2.

Community Engagement Resident Survey

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.

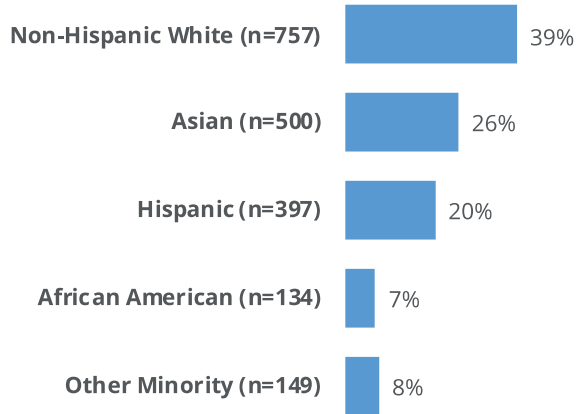


Figure 3.
Survey Respondents
by Tenure

Note:

n=2,426.

Source:

Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

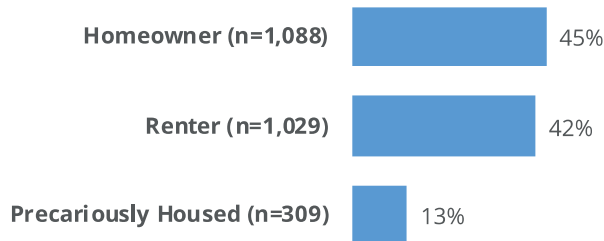


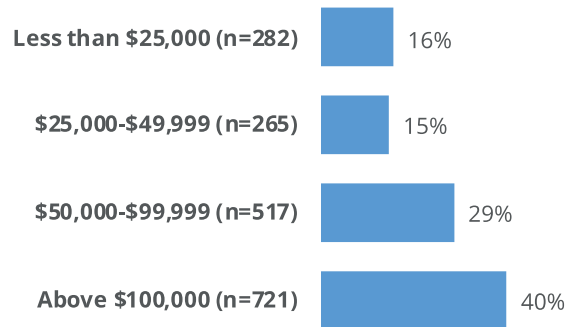
Figure 4.
Survey Respondents
by Income

Note:

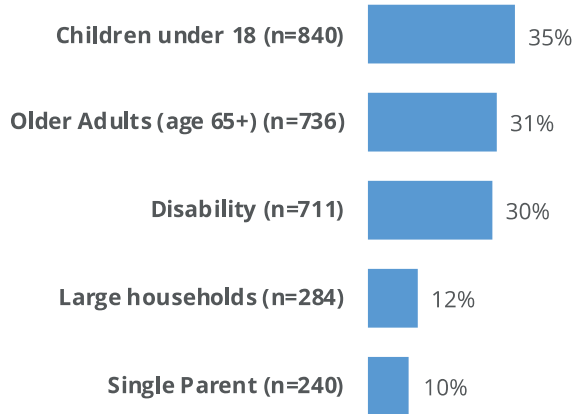
n=1,785.

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	Jurisdiction														
		Belmont	Brisbane	Burlingame	Daly City	East Palo Alto	Foster City	Half Moon Bay	Hillsborough	Milbrae	Pacifica	Redwood City	San Bruno	San Mateo	South San Francisco	
Valid cases	2,159	82	73	158	118	49	135	59	50	53	79	151	93	163	738	
I would like to move but I can't afford anything that is available/income too low	31%	27%	12%	20%	51%	41%	16%	25%	4%	32%	28%	43%	30%	38%	35%	
My house or apartment isn't big enough for my family	20%	22%	11%	14%	24%	35%	10%	12%	4%	21%	11%	26%	20%	26%	21%	
I worry that if I request a repair it will result in a rent increase or eviction	14%	21%	10%	13%	17%	14%	9%	10%	2%	23%	15%	20%	11%	15%	13%	
My home/apartment is in bad condition	11%	15%	14%	9%	15%	12%	3%	7%	0%	11%	18%	14%	5%	15%	10%	
My landlord refuses to make repairs despite my requests	6%	6%	14%	3%	5%	12%	4%	5%	2%	2%	9%	9%	5%	10%	5%	
I live too far from family/friends/my community	6%	6%	5%	4%	8%	4%	5%	8%	6%	6%	3%	8%	4%	7%	5%	
I don't feel safe in my building/neighborhood	6%	7%	5%	5%	13%	8%	0%	7%	6%	11%	10%	8%	3%	6%	3%	
I need help taking care of myself/my home and can't find or afford to hire someone	5%	2%	7%	7%	7%	10%	2%	14%	2%	8%	9%	3%	4%	8%	4%	
I have bed bugs/insects or rodent infestation	5%	10%	5%	4%	3%	16%	2%	3%	4%	6%	9%	11%	6%	4%	3%	
The HOA in my neighborhood won't let me make changes to my house or property	4%	2%	5%	1%	3%	8%	11%	3%	2%	4%	5%	3%	3%	4%	2%	
None of the above	42%	37%	48%	50%	20%	33%	55%	44%	76%	36%	47%	28%	45%	35%	46%	

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

The following two figures segment the answers by:

- Housing affordability challenges only; and
- Neighborhood challenges only.

Housing affordability challenges. As shown in Figure 6b, residents in San Mateo, Daly City, East Palo Alto, and Pacifica experience affordability challenges at a higher rate than the county overall. Conversely, Belmont, Hillsborough, Burlingame, and South San Francisco residents experience affordability challenges at a lower rate than the county.

The most significant geographic variations occur in:

- San Mateo city residents experience all five affordability challenges at a greater rate than the county overall. In addition to being less likely to pay utility bills or rent on time, San Mateo residents are more than twice as likely than the average county respondent to have bad credit or a history of eviction/foreclosure that impacts their ability to rent.
- East Palo Alto, San Mateo, and Daly City residents are most likely to experience difficulty paying utility bills.
- Residents in East Palo Alto and Redwood City are most likely to be late on their rent payments.
- Millbrae residents experience the greatest difficulty paying their property taxes among jurisdictions in San Mateo County.
- Respondents from Brisbane, Half Moon Bay, and Pacifica are also more likely to have trouble keeping up with property taxes.
- Daly City, City of San Mateo, and Redwood City respondents are more likely to have bad credit or an eviction history impacting their ability to rent.

Overall, over a third of jurisdictions' respondents experienced the following affordability challenges at a higher rate than the county: *I can't keep up with my property taxes and I have bad credit/history of evictions/foreclosure and cannot find a place to rent.*

Figure 6b.
Top 5 Affordability Challenges Experienced by Jurisdiction

■ 25% Above County average
■ 25% Below County average

Affordability Challenges	County	Belmont	Brisbane	Burlingame	Daly City	East Palo Alto	Foster City	Half Moon Bay	Hillsborough	Milbrae	Pacifica	Redwood City	San Bruno	San Mateo	South San Francisco
Valid cases	2,130	83	73	157	115	51	134	58	50	50	77	147	93	160	728
I can't keep up with my utilities	10%	6%	5%	6%	15%	16%	5%	12%	4%	12%	8%	12%	9%	15%	9%
I'm often late on my rent payments	8%	6%	5%	6%	10%	20%	3%	7%	2%	8%	4%	12%	4%	11%	7%
I can't keep up with my property taxes	6%	2%	10%	4%	3%	2%	8%	10%	0%	16%	10%	3%	5%	9%	5%
I have bad credit/history of evictions/foreclosure and cannot find a place to rent	4%	1%	4%	2%	13%	6%	0%	0%	2%	0%	5%	8%	4%	10%	2%
I have Section 8 and I am worried my landlord will raise my rent higher than my voucher payment	4%	2%	7%	3%	3%	2%	7%	3%	4%	4%	5%	3%	3%	6%	2%
None of the above	73%	73%	68%	80%	65%	59%	78%	66%	88%	64%	71%	70%	77%	63%	80%

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Neighborhood challenges. As shown in Figure 6c, residents in East Palo Alto, Brisbane, Daly City, and Pacifica experience neighborhood challenges at a higher rate than the county. Burlingame and Foster City both experience neighborhood challenges at a lower rate than the county.

Hillsborough and Belmont residents report divergent experiences related to neighborhood challenges — respondents identified more challenges around neighborhood infrastructure and access to transit but fewer challenges around school quality and job opportunities.

There are a handful of jurisdictions who experience specific neighborhood challenges at a disproportionate rate compared to the county.

- For instance, East Palo Alto and Belmont residents experience neighborhood infrastructure issues (e.g., bad sidewalks, no lighting) more acutely than county residents overall.
- Brisbane residents experience transportation challenges in their neighborhoods.
- East Palo Alto, Redwood City, San Bruno, and South San Francisco experience challenges with school quality in their neighborhoods.
- Residents in Brisbane, Hillsborough, Pacifica, Belmont, and Half Moon Bay report the highest rates of difficulty accessing public transit.
- Daly City, Millbrae, San Mateo, and East Palo Alto residents were more likely to identify the lack of job opportunities available in their neighborhoods.

Over a third of jurisdictions' respondents experienced the following neighborhood challenges at a higher rate than the county: *I can't get to public transit/bus/light rail easily or safely.*

Figure 6c.
Top 5 Neighborhood Challenges Experienced by Jurisdiction

■ 25% Above County average
■ 25% Below County average

Neighborhood Challenges	County	Jurisdiction													
		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	Race/Ethnicity and Tenure								
		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	Race/Ethnicity and Tenure							
		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?

	Overall Percent Seriously Looked for Housing	Reason for Denial								None of the Above	n
		Landlord did not return calls and/or emails asking about a unit	Landlord said unit was available over phone, but when I showed up in person, it was no longer available	Landlord told me it would cost me more for my service or emotional animal	Landlord told me I can't have a service or emotional support animal	Landlord told me it would cost me more to rent because I have children	Landlord told me they don't rent to families with children	Landlord told me they do not accept Section 8 vouchers	Landlord told me they couldn't make changes to the apartment/ home for my disability		
Jurisdiction											
County	56%	26%	22%	14%						45%	928
Belmont	62%	33%								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					None of the Above	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		
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?

	Percent Denied Housing	Total n	Reason for Denial											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
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.

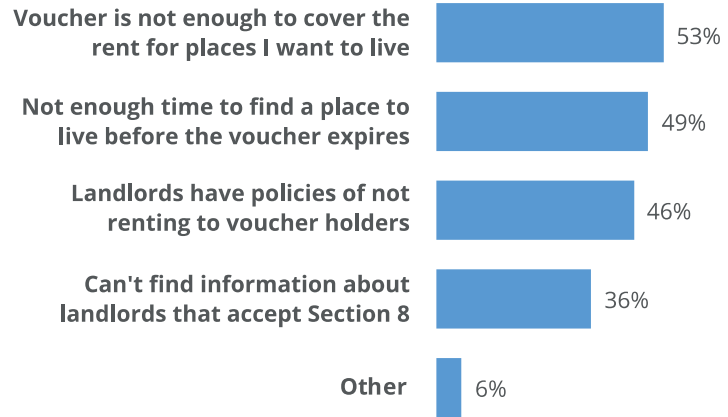


Figure 13. How difficult is it to find a landlord that accepts a housing voucher?

	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

	Percent Displaced	Total n	Reason for Displacement													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	
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%							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								n
			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	
Jurisdiction											
County	60%	306		28%		24%		25%			183
Belmont	45%	20		33%		44%		33%			9
Brisbane	81%	16		38%				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

Jurisdiction	Percent who felt they were discriminated against					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
	Percent who felt they were discriminated against	In the past year	2 to 5 years ago	More than 5 years ago	Don't remember											
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%										6
San Mateo	43%	72%	65	41%	47%					41%						17
South San Francisco	30%	68%	210	35%	28%	32%										57
Race/Ethnicity																
African American	71%	87%	95		40%		40%	33%								15
Asian	31%	77%	157	29%	34%	26%			26%							35
Hispanic	41%	70%	162	37%	54%				35%							46
Other Race	38%	71%	56	63%		50%	44%									16
Non-Hispanic White	32%	77%	241	33%		27%		21%								52
Tenure																
Homeowner	29%	82%	280	35%		37%		37%								43
Renter	39%	73%	347	41%	40%				27%							88
Precariously Housed	56%	71%	154		37%		26%				33%					43
Income																
Less than \$25,000	59%	71%	167		42%				27%		23%					48
\$25,000-\$49,999	40%	67%	107		45%	45%	45%									31
\$50,000-\$99,999	35%	77%	180	43%	26%	24%										42
Above \$100,000	23%	82%	167	52%		34%		41%								29
Household Characteristics																
Children under 18	35%	78%	293		40%		29%		32%							63
Large Households	35%	70%	99	41%	45%				34%							29
Single Parent	58%	81%	139		48%		28%		41%							29
Older Adults (age 65+)	46%	76%	337	44%	29%	30%										79

Source: Root Policy Research from the 2021-2022 21 Elements AFFH Resident Survey.

Transportation. Over 80% of respondents indicated the type of transportation used most often is driving a personal vehicle. This share was relatively similar across the majority of jurisdictions and was the number one type of transportation used across all jurisdictions and demographic characteristics.

The groups with the lowest proportion of those who primarily drive included African American (40%), households making less than \$25,000 (53%), single parents (57%), and precariously housed (57%) respondents.

As shown in Figure 18, on average respondents are fairly satisfied with their transportation situation. Those groups somewhat or not at all satisfied with their transportation options include African American (58%), Brisbane (51%), single parents (45%) and precariously housed (44%) respondents.

Figure 18.
Are you satisfied
with your current
transportation
options?

Source:

Root Policy Research from the
 2021-2022 21 Elements AFFH
 Resident Survey.

	Entirely satisfied	Mostly satisfied	Somewhat unsatisfied	Not at all satisfied	n
Jurisdiction					
County	29%	45%	20%	6%	1,903
Belmont	21%	42%	27%	10%	78
Brisbane	17%	33%	38%	13%	64
Burlingame	32%	45%	21%	1%	139
Daly City	19%	52%	20%	8%	109
East Palo Alto	31%	36%	24%	9%	45
Foster City	29%	43%	20%	9%	115
Half Moon Bay	30%	35%	26%	9%	46
Hillsborough	50%	34%	14%	2%	44
Milbrae	30%	45%	13%	13%	40
Pacifica	28%	42%	15%	15%	65
Redwood City	30%	36%	27%	8%	142
San Bruno	23%	54%	19%	4%	81
San Mateo	29%	52%	14%	4%	134
South San Francisco	34%	48%	15%	3%	666
Race/Ethnicity					
African American	22%	21%	48%	10%	134
Asian	23%	49%	24%	4%	500
Hispanic	29%	43%	22%	7%	397
Other Race	29%	41%	21%	9%	149
Non-Hispanic White	32%	45%	17%	5%	757
Tenure					
Homeowner	31%	45%	18%	6%	905
Renter	27%	44%	23%	6%	834
Precariously Housed	20%	36%	35%	9%	254
Income					
Less than \$25,000	22%	39%	29%	10%	282
\$25,000-\$49,999	25%	42%	26%	8%	265
\$50,000-\$99,999	28%	52%	16%	4%	517
Above \$100,000	34%	44%	18%	4%	721
Household Characteristics					
Children under 18	25%	43%	25%	6%	840
Large Households	29%	50%	18%	4%	284
Single Parent	20%	36%	38%	7%	240
Disability	25%	40%	27%	8%	658
Older Adults (age 65+)	30%	43%	21%	6%	736

Solutions offered by residents. Respondents were asked a series of questions about how to improve their situations related to housing, employment, health, education and neighborhood.

Improve housing security. When asked what could improve a respondent's housing security, the top answers among respondents by jurisdiction, race/ethnicity, tenure, income, and other selected housing characteristics were *none of the above* and *help me with a downpayment/purchase*.

The highest proportion of respondents among groups that selected *None of the above* includes:

- Hillsborough residents, 71%
- Owners, 65%
- Income greater than \$100,000, 54%
- Foster City residents, 53%
- White, 51%
- Burlingame residents, 50%

The highest proportion of respondents among groups that selected *Help me with a downpayment or purchase* includes:

- Renters, 44%
- Large households, 42%
- Daly City residents, 41%
- Hispanic, 39%
- Precariously housed, 39%
- City of San Mateo residents, 37%

Other solutions to improve housing security identified by several different groups included *Help me with the housing search*, *help me pay rent each month*, and *find a landlord who accepts Section 8*. The highest proportion of respondents among groups that selected these solutions includes:

Help me with the housing search

- Precariously housed, 39%
- Income less than \$25,000, 34%
- Income between \$25,000-\$50,000, 29%

- Half Moon Bay residents, 27%

Help me pay rent each month

- Income less than \$25,000, 35%
- Single parent, 31%

Find a landlord who accepts Section 8

- Black or African American, 37%

Improve neighborhood situation. When asked what could improve a respondent's neighborhood situation, nearly every respondent group by jurisdiction, race/ethnicity, tenure, income, and other selected housing characteristics identified *Better lighting*. Other solutions flagged by multiple respondent groups to improve their neighborhood situations includes *Improve street crossings* and *none of the above*.

The highest proportion of respondents among groups that selected *Better lighting* includes:

- East Palo Alto residents, 45%
- Millbrae residents, 45%
- Other race, 42%
- Daly City residents, 41%
- Hispanic, 40%
- Income between \$25,000-\$50,000, 40%
- Income between \$50,000-\$100,000, 40%

The highest proportion of respondents among groups that selected *Improve street crossings* includes:

- City of San Mateo residents, 34%
- Single parent, 31%

The highest proportion of respondents among groups that selected *None of the above* includes:

- Foster City residents, 37%
- Hillsborough residents, 36%
- Burlingame residents, 28%

Additionally, 42% of Millbrae respondents chose *Reduce crime*, 40% of Brisbane respondents chose *More stores to meet my needs*, and Belmont (34%) and Half Moon Bay (33%) respondents chose *Build more sidewalks*.

Improve health situation. When asked what could improve a respondent's health situation, the majority of respondent groups by jurisdiction, race/ethnicity, tenure, income, and other selected housing characteristics selected *Make it easier to exercise*, *More healthy food* and *None of the above*.

The highest proportion of respondents among groups that selected *Make it easier to exercise* includes:

- Redwood City residents, 48%
- Hispanic, 42%
- South San Francisco residents, 41%
- City of San Mateo residents, 41%
- Asian, 41%
- Renters, 40%

The highest proportion of respondents among groups that selected *More healthy food* includes:

- East Palo Alto residents, 48%
- Precariously Housed, 47%
- Single parent, 41%
- Daly City residents, 40%
- Income less than \$25,000, 38%
- Black or African American, 37%
- Large Households, 37%

The highest proportion of respondents among groups that selected *None of the above* includes residents from:

- Hillsborough residents, 48%
- Burlingame residents, 47%
- Foster City residents, 42%
- White, 41%
- Owners, 39%

Additionally, African American (34%) and San Bruno (29%) respondents identified *Better access to mental health care* as a solution to help improve their health situations.

Improve job situation. When asked what could improve a respondent's employment situation, the majority of respondent groups by jurisdiction, race/ethnicity, tenure, income, and other selected housing characteristics selected *Increase wages* and *None of the above*.

The highest proportion of respondents among groups that selected *Increase wages* includes:

- Renters, 52%
- Single parents, 50%
- Hispanic, 49%
- Households with children, 49%
- Daly City residents, 49%
- Income between \$50,000-\$100,000, 49%
- Large households, 48%

The highest proportion of respondents among groups that selected *None of the above* includes:

- Hillsborough residents, 76%
- Owners, 58%
- White, 57%
- Over 65+, 53%
- Income greater than \$100,000, 53%
- Foster City residents, 53%

Additionally, 29% of households with income less than \$25K identified *Find a job near my apartment or house* as a solution to help improve their situation.

Improve education situation. When asked what could improve a respondent's education situation for their children, the majority of respondent groups by jurisdiction, race/ethnicity, tenure, income, and other selected housing characteristics selected *None of the above*, *Have more activities*, and *Stop bullying/crime/drug use at school*.

The highest proportion of respondents among groups that selected *None of the above* includes:

- Burlingame residents, 55%

- White, 52%
- Over 65+, 51%
- Hillsborough residents, 49%
- Foster City residents, 46%
- Brisbane residents, 45%

The highest proportion of respondents among groups that selected *Have more activities* includes:

- Single parent, 45%
- Households with children, 41%
- Large households, 41%
- Other race, 37%
- Daly City residents, 34%
- Hispanic, 34%

The highest proportion of respondents among groups that selected *Stop bullying/crime/drug use at school* includes:

- East Palo Alto residents, 38%
- Precariously housed, 31%
- Other race, 30%
- Redwood City residents, 29%
- Hispanic, 29%
- San Mateo residents, 28%

Additionally, 29% of Millbrae respondents identified *Have better teachers at their schools* as a means to improve the education situation in their respective households.

AFFH Attachment C.3.

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 Lomas Elementary school districts scored far below the overall student body: In these districts, students with disabilities met or exceeded mathematics test standards at 54 percentage points below the overall test rate.

Many students meet admissions standards for CSU or UC schools.

- Among the high school districts in San Mateo County, Sequoia Union had the highest rate of graduates who met such admission standards, at 69%. On the other end of the spectrum, Cabrillo Unified and South San Francisco Unified had the lowest rates at 41%.
- Jefferson Union High School District had the most drastic increase in the share of graduates meeting CSU or UC standards: just 21% of students met these standards in 2016-2017 compared to 48% of students in 2019-2020. La Honda-Pescadero Unified School District experienced a 10 percentage point increase in this success rate over the same period.

Most school districts in the county have a college-going rate at 70% or higher—yet there are wide gaps by race and ethnicity.

- In every district, White students have a higher college-going rate than Hispanic students, but the largest gaps are in South San Francisco Unified, where 91% of White students go to college compared to just 68% of Hispanic students—a 23 percentage point gap.

Students with extenuating circumstances are highly concentrated in a few schools and move schools often due to housing instability.

- Students with extenuating circumstances may need additional resources—e.g., onsite health care, free meals, tutoring—to be successful in school. When these students are concentrated into a few schools, the schools bear an unequal responsibility for providing needed resources. K-12 school funding in California has long been inadequate, and, although policymakers have recently allocated additional resources to schools with high proportions of low income children under a “concentration grant” system, funding gaps remain.
- The highest concentration of high needs students is found in Ravenswood City Elementary, where 30% of all students are experiencing homelessness and 83% qualify for free and reduced lunch.
- Currently, students whose families have been evicted do not have protections allowing them to remain in their current school district. This can result in frequent changes in schools for low income children, raising their vulnerability to falling behind in school.

Absenteeism, dropout rates, and discipline rates are highest for students of color, students with disabilities, and students with other extenuating circumstances.

While 10% of students were chronically absent during the 2018-2019 school year, chronic absenteeism rates were higher in districts with a large number of students experiencing economic and housing precarity.

- For instance, Ravenswood Elementary, which has a 30% rate of homelessness among students, had one of the higher rates of chronic absenteeism at 16%.

- Pacific Islander students (26%), Black/African American students (18%), and Hispanic students (15%) had notably higher rates of chronic absenteeism than the overall student population (10%).
- In most districts, chronic absenteeism is higher among students with disabilities. In fact, only Bayshore Elementary’s students with disabilities had a lower rate of chronic absenteeism than the overall student body.

Dropout rates vary across the county:

- Dropout rates were highest in Sequoia Union High School District (10%) and South San Francisco Unified (9%).
- In all school districts in the county, dropout rates are higher for boys than for girls.
- Pacific Islander, Black/African American, and Hispanic students in the county often had higher dropout rates than those in other racial and ethnic groups
- Students with disabilities, students experiencing homelessness, foster youth, and students learning English had higher dropout rates than the overall population.

Discipline rates also vary by area and race and ethnicity.

- In many school districts across San Mateo County, Hispanic students are disciplined at disproportionately higher rates compared to their peers.
- In most districts, Black/African American and Pacific Islander students are also overrepresented in terms of suspension rates, but these rates are slight compared to those of Hispanic students.
- Asian and Filipino students were underrepresented in terms of suspension rates. White students were also underrepresented in discipline rates in most districts except for La Honda-Pescadero.

The demographics of faculty and staff are fairly similar to that of students.

- There is a slightly larger share of White and Black/African American staff than students, meaning that Black/African American and White student groups are more likely to interact with same-race staff and faculty than other racial groups.
- Asian students are less likely to interact with a same-race staff 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.

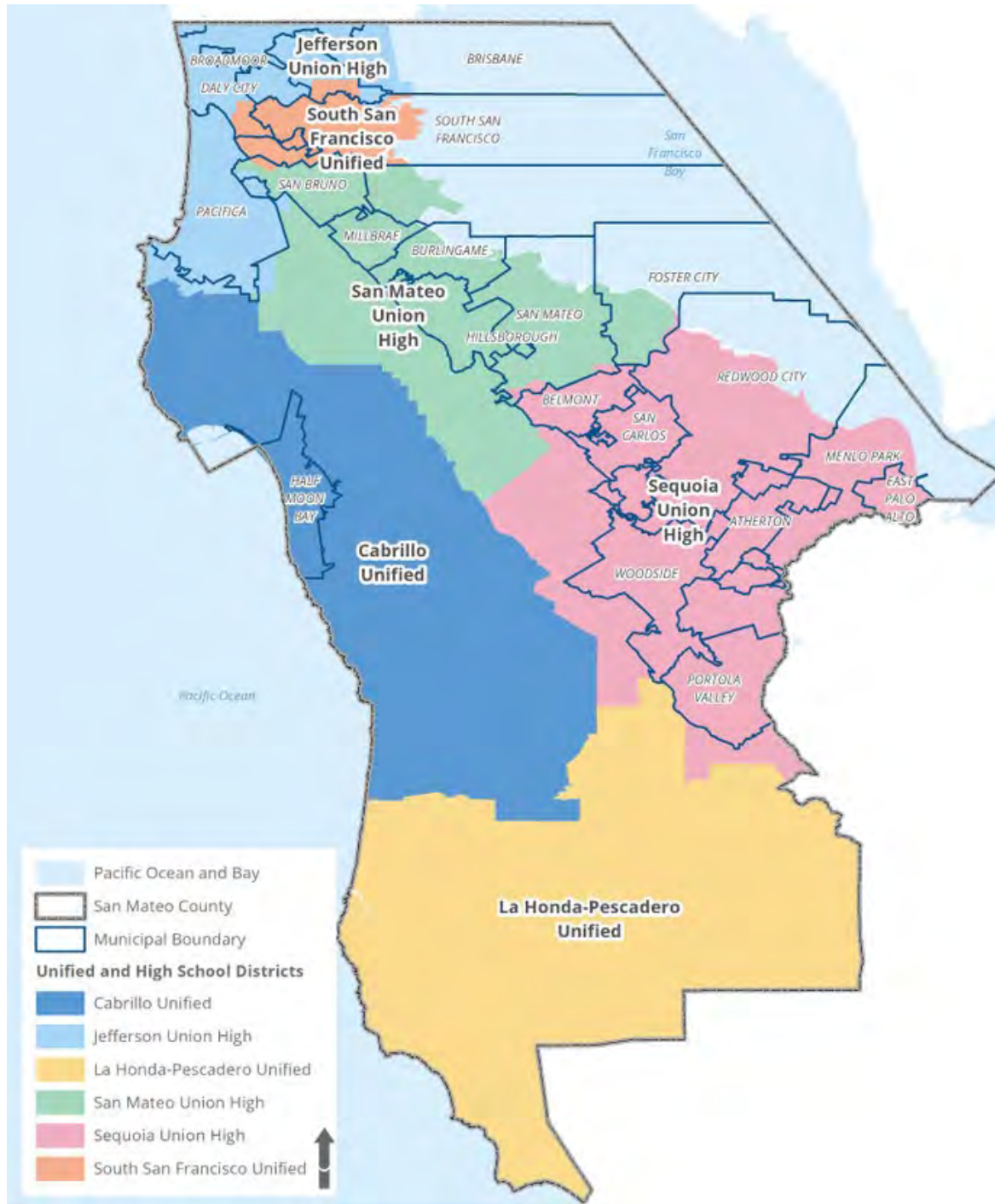
San Mateo County School Districts. There are three unified school districts in San Mateo County which include both elementary and high schools. These are **Cabrillo Unified School District, La Honda-Pescadero Unified School District,** and **South San Francisco Unified School District.**

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 overlaid on the map.

Figure V-1.
Unified School Districts and High School Districts in San Mateo County



Source: San Mateo County Office of Education.

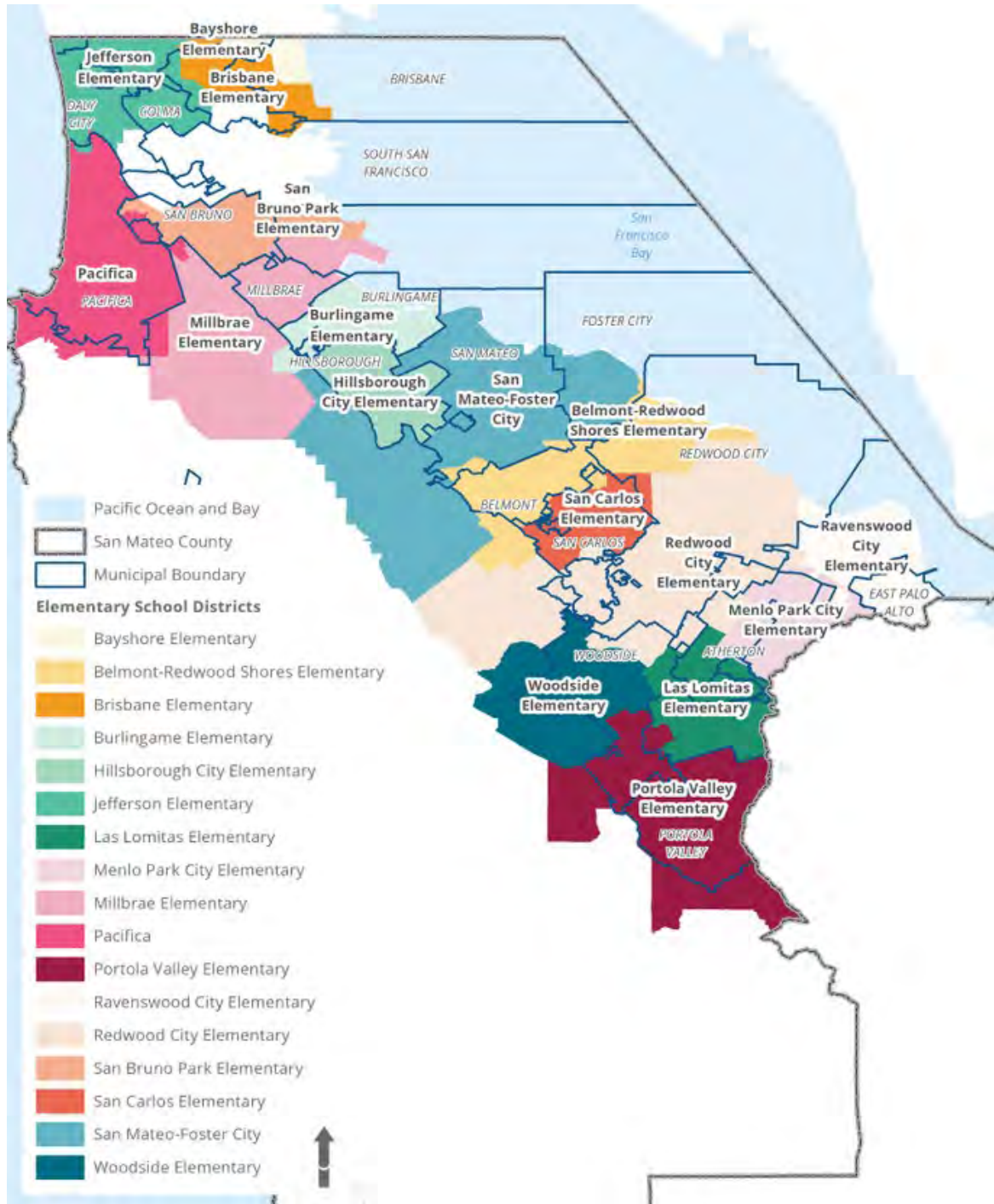
As illustrated in the map, Cabrillo Unified School District covers Half Moon Bay and some unincorporated areas of San Mateo County. South San Francisco Unified covers South San

Francisco and a small portion of Daly City. La Honda-Pescadero Unified School District covers unincorporated areas of San Mateo County.

The other high school districts, Jefferson Union, San Mateo Union, and Sequoia Union, cover the remaining jurisdictions. Jefferson Union covers Brisbane, Colma, Daly City, and Pacifica. San Mateo Union covers Burlingame, Hillsborough, Millbrae, San Bruno, San Mateo City, and Foster City. Sequoia Union covers Atherton, Belmont, Redwood City, East Palo Alto, Menlo Park, San Carlos, Portola Valley, and Woodside.

The county's elementary school districts cover the same areas as the three high school districts. Their geographic boundaries are illustrated in the map below.

**Figure V-2.
Elementary School Districts in San Mateo County**



Source: San Mateo County Office of Education.

Because the elementary school districts are much smaller, many jurisdictions have several elementary schools. The table below shows each jurisdiction and their associated elementary school.

Figure V-3.
School Districts in San Mateo County’s Jurisdictions

Jurisdiction	Unified or High School District	Elementary School District(s)
Atherton	Sequoia Union	Menlo Park City ; Las Lomas Elementary; Redwood City
Belmont	Sequoia Union	Belmont-Redwood Shores
Brisbane	Jefferson Union	Brisbane; Bayshore Elementary
Burlingame	San Mateo Union	Burlingame
Colma	Jefferson Union	Jefferson Elementary
Daly City	Jefferson Union; South San Francisco Unified	Jefferson Elementary
East Palo Alto	Sequoia Union	Ravenswood City
Foster City	San Mateo Union	San Mateo-Foster City
Half Moon Bay	Cabrillo Unified	(none, included in Cabrillo Unified)
Hillsborough	San Mateo Union	Hillsborough City
Menlo Park	Sequoia Union	Menlo Park City; Las Lomas Elementary; Ravenswood City
Millbrae	San Mateo Union	Millbrae
Pacifica	Jefferson Union	Pacifica
Portola Valley	Sequoia Union	Portola Valley
Redwood City	Sequoia Union	Redwood City
San Bruno	San Mateo Union	San Bruno Park
San Carlos	Sequoia Union	San Carlos; Redwood City
San Mateo	San Mateo Union	San Mateo-Foster City
South San Francisco	South San Francisco Unified	(none, included in South San Francisco Unified)
Woodside	Sequoia Union	Woodside Elementary; Portola Valley; Las Lomas; Redwood City

Source: San Mateo County Office of Education.

A brief history of district formation. San Mateo County’s numerous school districts were formed over a century ago, when the county was more rural and scattered: communities needed elementary schools close to home, and only a few students were attending high school. As young people began going to high school, individual districts often found they had too few students and resources to support their own high schools, so

separate high school districts, covering the territories of two or more elementary districts, were established to meet the communities' needs.²

Once California's population grew and San Mateo County became more urbanized, "a jigsaw puzzle of overlapping districts evolved haphazardly." Since 1920, the state has been pushing elementary districts to unify with the high school districts that serve their communities, citing improved educational quality and equity of opportunity. However, there has been limited success and local voters in San Mateo County have consistently resisted unification.³

Early efforts at unification were more successful in the rural communities along the coast—for example, voters approved the new Cabrillo Unified district for the area around Half Moon Bay and the La Honda-Pescadero Unified district in a 1964 election. Unification was not supported by many suburban communities edging the Bay. The county's school district committee proposed to split each of the three high school districts and feeder schools into two or three smaller unified districts, but the State Board of Education rejected variations of those plans three times. The Board argued that the county committee's proposals would create districts with widely varying property tax bases and could contribute to racial segregation. The State Board instead devised a plan that would create a single unified district within each of the existing high school district boundaries. Voters turned down the state plans in all three districts in June 1966, and rejected a similar proposal again in 1972. In 1973, the Mid-Peninsula Task Force for Integrated Education petitioned the county committees to unify the elementary districts of Menlo Park, Las Lomas, Portola Valley, Ravenswood and a portion of Sequoia Union High School District across county lines with Palo Alto Unified. Their goal was racial integration, but the county committee did not support the effort.⁴

Efforts against unification have persisted, leaving the county with several elementary school districts which feed into a high school, rather than a unified district. As a result, some elementary school districts have faced waning budgets and administrative hurdles. For instance, Brisbane and Bayshore elementary school districts, at the northern end of the county, serve a little more than 1,000 students and long have struggled with tight budgets. To rectify their budgetary concerns, the districts now share both a superintendent and a chief business officer. They also participate in a special education collaborative with the Jefferson elementary and high school districts.

According to the county's superintendent of schools Anne Campbell, other districts may find themselves pooling their resources in the future: local identification may be strong,

² Watson, Aleta. "How Did We End Up With 54 School Districts in San Mateo and Santa Clara Counties?" Silicon Valley Community Foundation, 2012. <https://www.siliconvalleycf.org/sites/default/files/report-edu.pdf>

³ Ibid.

⁴ Ibid.

she says, but financial reality is hard to ignore: “As we move forward in time, I think it’s going to be interesting to see what school districts are going to do, especially as budgets get more bleak.”⁵

Enrollment changes. Total public school enrollment in the county has decreased slightly, by just 1%, from the 2010-2011 academic year to 2020-2021. Figure V-4 illustrates enrollment changes by district.

Bayshore Elementary, Ravenswood City, and Portola Valley school districts experienced the largest enrollment decreases (by at least 30%) between 2010-11 and 2020-21. School districts with the largest increases in enrollments were Burlingame (22%) and Belmont-Redwood Shores (30%).

⁵ Ibid.

Figure V-4.
Enrollment changes by district, 2010-11 to 2020-2021

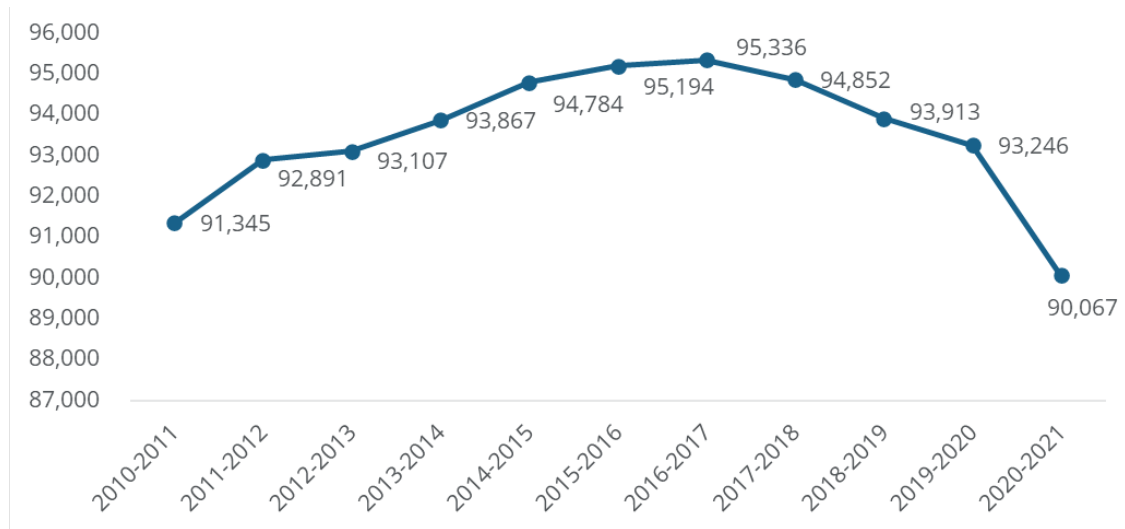
School District	2010-2011 Enrollment	2020-2021 Enrollment	Percent Change
Unified School Districts			
Cabrillo Unified	3,352	2,934	-12%
La Honda-Pescadero	341	275	-19%
South San Francisco	9,312	8,182	-12%
High & Elementary School Districts			
Jefferson Union High School	4,960	4,705	-5%
Bayshore Elementary	543	361	-34%
Brisbane Elementary	545	474	-13%
Jefferson Elementary	6,998	6,653	-5%
Pacifica	3,164	3,006	-5%
San Mateo Union High School	8,406	9,760	16%
Burlingame Elementary	2,771	3,387	22%
Hillsborough City Elementary	1,512	1,268	-16%
Millbrae Elementary	2,222	2,238	1%
San Bruno Park Elementary	2,599	2,275	-12%
San Mateo-Foster City	10,904	10,969	1%
Sequoia Union High School	8,765	10,327	18%
Belmont-Redwood Shores	3,206	4,152	30%
Las Lomas Elementary	1,336	1,116	-16%
Menlo Park City Elementary	2,629	2,781	6%
Portola Valley Elementary	711	491	-31%
Ravenswood City Elementary	4,285	2,993	-30%
Redwood City Elementary	9,119	8,086	-11%
San Carlos Elementary	3,212	3,265	2%
Woodside Elementary	453	369	-19%
Total Enrollment	91,345	90,067	-1%

Source: California Department of Education and Root Policy Research

However, it is important to note that many of these enrollment decreases were driven by the pandemic. In fact, total enrollment in these public schools decreased by 3% between

2019-2020 and 2020-2021 in San Mateo County: the largest decrease of the decade. As shown in Figure V-5, enrollments actually increased steadily from 2010-2011 to 2017-2018, then began decreasing afterwards.

Figure V-5.
Public School Enrollment Changes, 2010-2011 to 2020-2021



Note: These data exclude enrollments in SBE Everest Public High School District, which in 2015 combined with the Sequoia Union High School District.

Source: California Department of Education and Root Policy Research

Portola Valley and La Honda-Pescadero school districts had the largest enrollment decreases during COVID-19, with a 11% and 10% decline in enrollments, respectively. The only school district with increasing enrollments between the 2019-2020 to 2020-2021 school years was Sequoia Union High School District, with a modest 1% increase in enrollments.

Figure V-6.
Enrollment changes by district during COVID-19, 2019-20 to 2020-21

School District	2019-2020 Enrollment	2020-2021 Enrollment	Percent Change
Unified School Districts			
Cabrillo Unified	3,136	2,934	-6%
La Honda-Pescadero	306	275	-10%
South San Francisco	8,438	8,182	-3%
High & Elementary School Districts			
Jefferson Union High School	4,811	4,705	-2%
Bayshore Elementary	381	361	-5%
Brisbane Elementary	476	474	0%
Jefferson Elementary	6,687	6,653	-1%
Pacifica	3,110	3,006	-3%
San Mateo Union High School	9,885	9,760	-1%
Burlingame Elementary	3,534	3,387	-4%
Hillsborough City Elementary	1,290	1,268	-2%
Millbrae Elementary	2,349	2,238	-5%
San Bruno Park Elementary	2,454	2,275	-7%
San Mateo-Foster City	11,576	10,969	-5%
Sequoia Union High School	10,238	10,327	1%
Belmont-Redwood Shores	4,314	4,152	-4%
Las Lomas Elementary	1,208	1,116	-8%
Menlo Park City Elementary	2,922	2,781	-5%
Portola Valley Elementary	551	491	-11%
Ravenswood City Elementary	3,269	2,993	-8%
Redwood City Elementary	8,530	8,086	-5%
San Carlos Elementary	3,405	3,265	-4%
Woodside Elementary	376	369	-2%
Total Enrollment	93,246	90,067	-3%

Source: California Department of Education and Root Policy Research.

Declining enrollments in public schools have been common across the state and country during the COVID-19 pandemic, and enrollment declines in San Mateo County are on par

with those across the state. According to a study conducted by the Public Policy Institute of California, public K–12 enrollment declined by 3% in California from the 2019-2020 school year to the 2020-2021 school year.⁶

As funding is tied directly to the number of enrolled pupils, schools in San Mateo County could suffer fiscal consequences with continued declines. By law, districts are “held harmless” for declines for one year—that is, school budgets for 2020–2021 were unaffected, but continued enrollment declines could mean cuts in future years.⁷ Reductions in enrollments, and consequently funding, could also worsen economic inequality in the long-term by reducing students’ resources and access to opportunities.

Demographics: race & ethnicity. Over the last decade, San Mateo County’s school districts have diversified in terms of students’ race and ethnicity. Hispanic students make up the largest ethnic group in the county’s schools: 38% of students identified as Hispanic in the 2020-2021 academic school year. This is just a one percentage point increase from 2010-2011. Many other students are White (26%), though this has decreased by 3 percentage points since 2010-2011, The largest increase was in Asian students, with 17% identifying as such in 2020-2021, an increase of 5 percentage points from 2010-2011. Other students identify as Filipino (8%), or bi- or multi-racial (8%). A small and decreasing percentage of students identify as Black/African American (1%) and Pacific Islander (2%).

⁶ Lafortune, Julien & Prunty, Emmanuel. “Digging into Enrollment Drops at California Public Schools.” Public Policy Institute of California. May 14, 2021. <https://www.ppic.org/blog/digging-into-enrollment-drops-at-california-public-schools/>

⁷ Ibid.

**Figure V-7.
Changes in Race and
Ethnicity, 2010-2011 to 2020-
2021**

Note: These data exclude enrollments in SBE Everest Public High School District, which in 2015 combined with the Sequoia Union High School District.

Source: California Department of Education and Root Policy Research

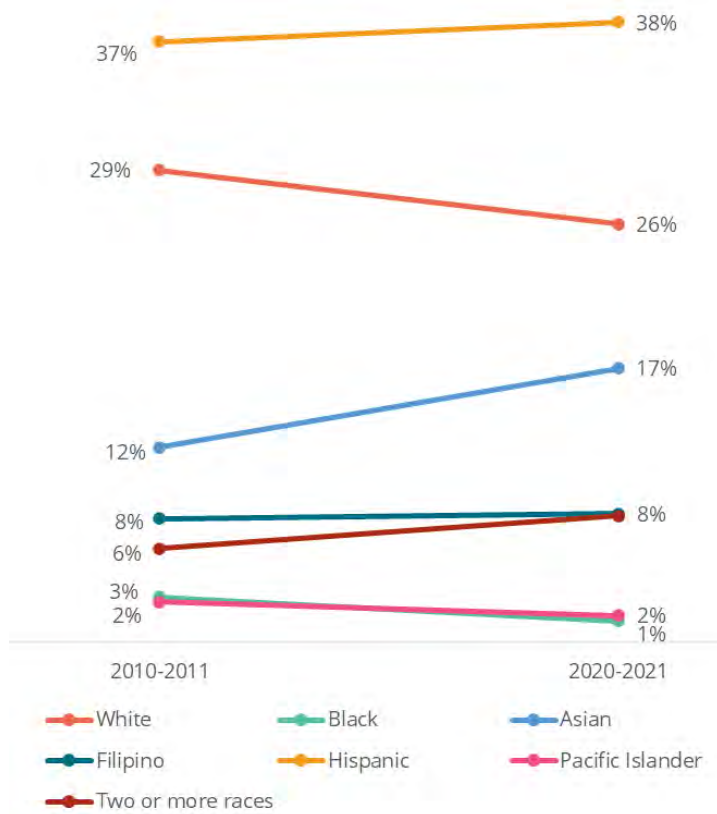


Figure V-8 shows the racial and ethnic distribution of students enrolled in public schools by jurisdiction in 2020-2021.

- Portola Valley Elementary School District (66%) and Woodside Elementary School District (64%) had the highest share of White students, making them among the least racially and ethnically diverse districts in the county.
- Ravenswood City Elementary School District and Redwood City Elementary School District had the highest share of Hispanic students, at 84% and 70%, respectively.
- Ravenswood City also had the highest proportion of Pacific Islander students (7%) and Black/African American students (5%) compared to other districts.
- Millbrae Elementary (46%), Hillsborough Elementary (32%), and Belmont-Redwood Shores Elementary (32%) had the highest share of Asian students.
- Jefferson Elementary School District and Jefferson Union High School District had the highest portion of Filipino students, at 25% and 29% respectively.

**Figure V-8.
Student body by Race and Ethnicity, 2020-2021**

School District	Asian	Black	Filipino	Hispanic	Pacific Islander	White	Two or more races
Unified School Districts							
Cabrillo Unified	1%	0%	1%	52%	0%	40%	5%
La Honda-Pescadero	0%	0%	1%	63%	0%	35%	1%
South San Francisco	14%	1%	23%	48%	2%	6%	6%
High & Elementary School Districts							
Jefferson Union High School	15%	1%	29%	31%	1%	14%	7%
Bayshore Elementary	19%	3%	21%	41%	4%	3%	8%
Brisbane Elementary	20%	1%	12%	28%	0%	24%	11%
Jefferson Elementary	19%	2%	25%	36%	1%	11%	5%
Pacifica	8%	1%	9%	26%	0%	39%	16%
San Mateo Union High School	23%	1%	5%	32%	2%	28%	10%
Burlingame Elementary	27%	0%	3%	16%	0%	41%	9%
Hillsborough Elementary	32%	0%	2%	5%	0%	48%	12%
Millbrae Elementary	46%	1%	6%	20%	2%	16%	8%
San Bruno Park Elementary	16%	1%	10%	41%	5%	15%	1%
San Mateo-Foster City	26%	1%	3%	37%	2%	21%	9%
Sequoia Union High School	9%	2%	1%	45%	2%	35%	5%
Belmont-Redwood Shores	32%	1%	3%	12%	1%	34%	14%
Las Lomas Elementary	18%	1%	1%	13%	0%	53%	14%
Menlo Park City Elementary	13%	1%	1%	17%	1%	55%	11%
Portola Valley Elementary	6%	0%	0%	14%	0%	66%	13%
Ravenswood City Elementary	0%	5%	0%	84%	7%	1%	2%
Redwood City Elementary	4%	1%	1%	70%	1%	19%	4%
San Carlos Elementary	18%	1%	1%	14%	0%	49%	13%
Woodside Elementary	4%	2%	0%	16%	1%	64%	11%
Total	17%	1%	8%	38%	2%	26%	8%

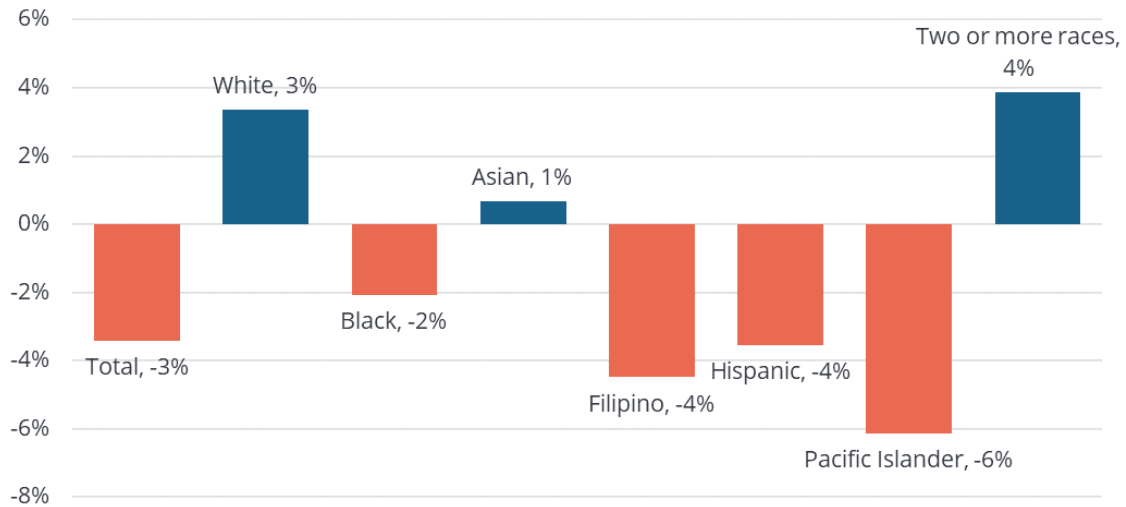
Note: In almost all school districts, less than 1% of students were Native American, so they are not included in this table.

Source: California Department of Education and Root Policy Research

Enrollment changes due to COVID-19 varied by race and ethnicity. For instance, between 2019-2021, enrollment among Pacific Islander students decreased by 6% (from 1,581 students in 2019-20 to 1,484 students in 2020-21). This is substantially higher than the 3% countywide average. Enrollments among Filipino and Hispanic students decreased by 4% while enrollment among Black/African American students decreased by 2%. On the other

end of the spectrum, there was a 3% increase in enrollment among White students (from 22,308 students to 23,055 students) between 2019-20 and 2020-21. Similarly, there was a 1% increase in enrollment among Asian students and a 4% increase among students of two or more races.

Figure V-9.
Enrollment Changes by Race and Ethnicity, San Mateo County, 2019-20 to 2020-21



Source: California Department of Education and Root Policy Research

While many of their families may have simply moved out of San Mateo County during the pandemic, it is possible that Black/African American, Filipino, Hispanic, and Pacific Islander students are otherwise slipping through the cracks of the education system during this period.

Demographics: students with extenuating circumstances. Several students in the county’s public schools are facing additional hurdles to educational ease. Many are English learners, qualify for reduced lunch, are foster children, are experiencing homelessness, have a disability, or are migrants. Students in these groups often have hindrances to excelling in school because of detrimental circumstances beyond their control. These include financial and social hardships as well as problems within students’ families.

Qualification for free and reduced lunch is often used as a proxy for extenuating circumstances. Qualifications are determined based on household size and income. For instance, in the 2020-2021 academic year, students from a household of three making less

than \$40,182 annually qualified for reduced price meals, and those making less than \$28,236 in a household of three qualified for free meals.⁸

Free and reduced lunch disparities. Overall, 29% of public school students in San Mateo County qualify for reduced or free lunch. This rate was substantially lower in districts like Hillsborough Elementary, San Carlos Elementary, Portola Valley Elementary, Las Lomas Elementary, Belmont-Redwood Shores, and Menlo Park City Elementary, where each had less than 10% of students qualify for free or reduced lunch.

The rate of reduced lunch qualification was far higher in Ravenswood City Elementary School District, where 83% of students qualify for reduced lunch.

Disparities in homelessness. In Ravenswood City Elementary, 30% of students are experiencing homelessness. This is an outlier in the county, where overall just 2% are experiencing homelessness. The school district has received media attention due to its astronomically high rate of students experiencing homelessness. Some have noted that rates of homelessness have increased due to escalating costs of living in an area surrounded by affluence.⁹ Others have highlighted that "Having a roof over your head, having a safe place to sleep and study, is fundamental to absolutely everything," and have noted that students who experience homelessness have higher dropout rates and are more likely to experience homelessness as adults.¹⁰

School moves related to evictions. Currently, students whose families have been evicted do not have protections allowing them to remain in their current school district. This means that precarious housing also means precarious schooling for many of the county's students. Frequent moves by students are closely related to lower educational proficiency.

In the City of San Francisco, a 2010 ordinance protects some students from being evicted during the school year; however, it only relates to owner/relative move-in evictions.¹¹ Children in families who are evicted for other reasons may need to move schools or districts when their housing is lost.

English language learners. Countywide, 20% of public school students are English learners. Again, this rate is highest at Ravenswood City Elementary, where 53% of students are English learners. La Honda-Pescadero Unified School District, Jefferson Union High

⁸ "Income Eligibility Scales for School Year 2020-2021." California Department of Education.

⁹ Bartley, Kaitlyn. "Homelessness: The shadow that hangs over students in this Bay Area school district." The Mercury News. December 2018.

¹⁰ Jones, Carolyn. "California schools see big jump in homeless students." Palo Alto Online. October 2020.

¹¹ <https://sfrb.org/new-amendment-prohibiting-owner-move-evictions-minor-children-during-school-year>

School, and Redwood City Elementary also have high rates of English learners, representing more than a third of students.

Less than one percent of students in San Mateo County public school districts are foster youth or migrants. Cabrillo Unified School District had the highest rate of migrant students at 3%. La Honda-Pescadero had the highest rate of foster children at 2%.

School districts without large low income populations also tend to serve very few English language learners. For instance, in Hillsborough Elementary where 0% of students qualify for reduced lunch, only 1% of students are English language learners.

Figure V-10.
Students with Extenuating Circumstances, 2020-2021

School District	English Learners	Reduced Lunch	Foster Children	Homeless	Migrant
Unified School Districts					
Cabrillo Unified	20%	37%	0%	2%	3%
La Honda-Pescadero	38%	38%	2%	1%	1%
South San Francisco	21%	34%	0%	1%	1%
High & Elementary School Districts					
Jefferson Union High School	36%	44%	0%	0%	0%
Bayshore Elementary	30%	57%	0%	0%	0%
Brisbane Elementary	16%	19%	0%	0%	0%
Jefferson Elementary	14%	27%	0%	1%	0%
Pacifica	9%	18%	0%	1%	0%
San Mateo Union High School	10%	21%	0%	0%	0%
Burlingame Elementary	13%	11%	0%	0%	0%
Hillsborough Elementary	1%	0%	0%	0%	0%
Millbrae Elementary	19%	25%	0%	0%	0%
San Bruno Park Elementary	29%	18%	0%	0%	0%
San Mateo-Foster City	26%	28%	0%	2%	0%
Sequoia Union High School	15%	30%	0%	0%	0%
Belmont-Redwood Shores	10%	7%	0%	0%	0%
Las Lomas Elementary	7%	6%	0%	0%	0%
Menlo Park City Elementary	6%	7%	0%	0%	0%
Portola Valley Elementary	4%	5%	0%	0%	0%
Ravenswood City Elementary	53%	83%	0%	30%	0%
Redwood City Elementary	38%	56%	0%	2%	1%
San Carlos Elementary	5%	6%	0%	0%	0%
Woodside Elementary	8%	10%	0%	0%	0%
Total	20%	29%	<1%	2%	<1%

Source: California Department of Education and Root Policy Research

The overall share of students in these groups has not changed drastically over time. As shown in Figure V-11, there have been slight decreases in the share of students who are English learners and the share of students who qualify for reduced lunch from 2016-2017

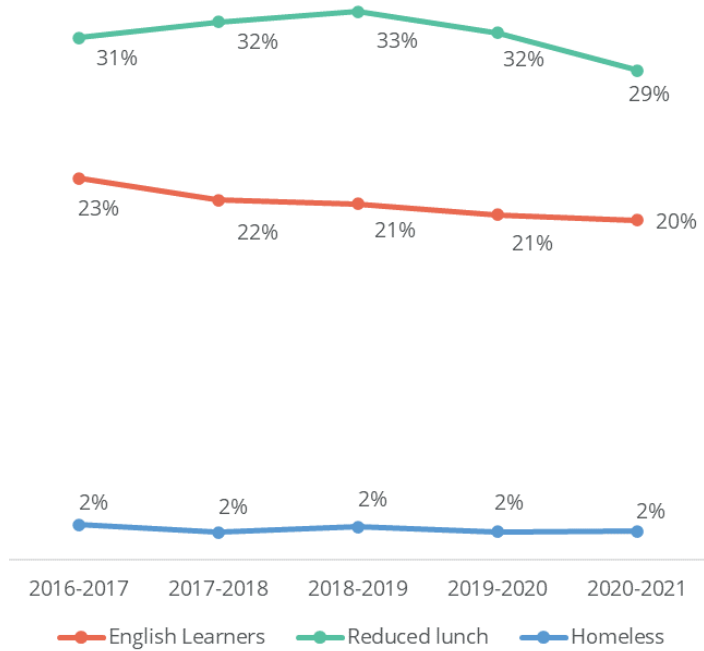
to 2020-2021. Around 2% of students in the county are homeless and this has not changed between 2016-2017 and 2020-2021. Foster youth and migrant students are not shown in the figure, as both have hovered at less than 1% from year to year.

Figure V-11.
Changes in rates of English Learners, 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.

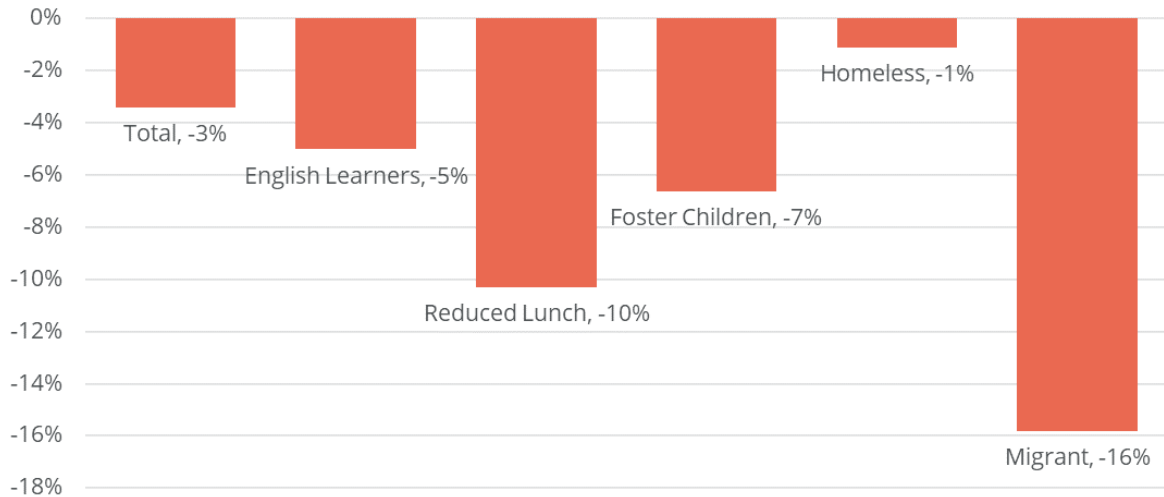
Source: California Department of Education and Root Policy Research

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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

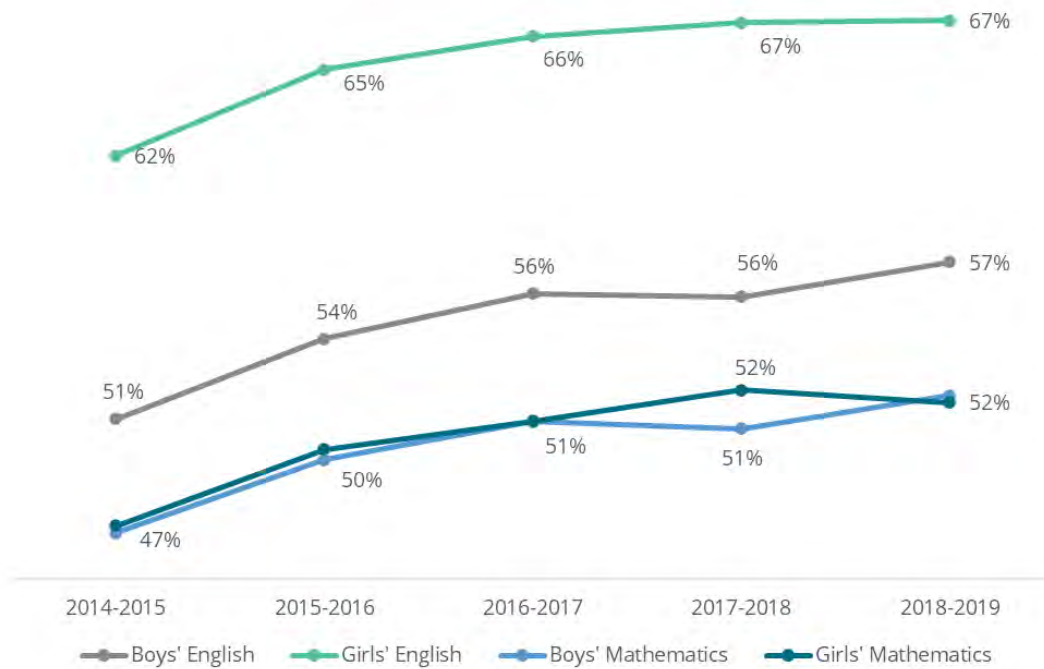
District	English Language Arts/Literacy			Mathematics		
	Total	Boys	Girls	Total	Boys	Girls
Unified School Districts						
Cabrillo Unified	48%	41%	55%	34%	31%	38%
La Honda-Pescadero	43%	36%	49%	31%	34%	28%
South San Francisco	52%	45%	60%	44%	42%	45%
High & Elementary School Districts						
Jefferson Union High School	57%	52%	63%	37%	38%	35%
Bayshore Elementary	27%	24%	31%	27%	27%	28%
Brisbane Elementary	64%	56%	72%	54%	56%	53%
Jefferson Elementary	48%	43%	54%	37%	39%	35%
Pacifica	60%	55%	65%	57%	57%	57%
San Mateo Union High School	70%	66%	76%	50%	50%	50%
Burlingame Elementary	80%	75%	84%	78%	78%	78%
Hillsborough Elementary	85%	81%	89%	85%	86%	84%
Millbrae Elementary	63%	57%	70%	58%	58%	58%
San Bruno Park Elementary	50%	47%	53%	41%	43%	38%
San Mateo-Foster City	62%	58%	67%	56%	56%	56%
Sequoia Union High School	68%	64%	72%	50%	50%	50%
Belmont-Redwood Shores	82%	78%	86%	79%	78%	80%
Las Lomitas Elementary	86%	84%	88%	82%	84%	80%
Menlo Park City Elementary	84%	81%	87%	83%	82%	83%
Portola Valley Elementary	87%	83%	91%	83%	84%	82%
Ravenswood City Elementary	22%	20%	23%	15%	16%	13%
Redwood City Elementary	54%	49%	59%	46%	46%	46%
San Carlos Elementary	80%	77%	83%	75%	76%	74%
Woodside Elementary	88%	85%	91%	84%	85%	83%
Total	62%	57%	67%	52%	52%	52%

Source: California Department of Education, California Assessment of Student Performance and Progress, and Root Policy Research

The gender gap in test scores has started to close in recent years, as indicated in Figure V-15. In 2014-2015 there was a 11 percentage point gap in girls' and boys' English testing pass

rates, and by 2018-2019 this was just a 10 percentage point gap. The figure also indicates that there have been steady gains in the share of students meeting or exceeding testing standards in the county.

Figure V-15.
Students who Met or Exceeded Testing Standards, by Gender, 2014-2015 to 2018-2019



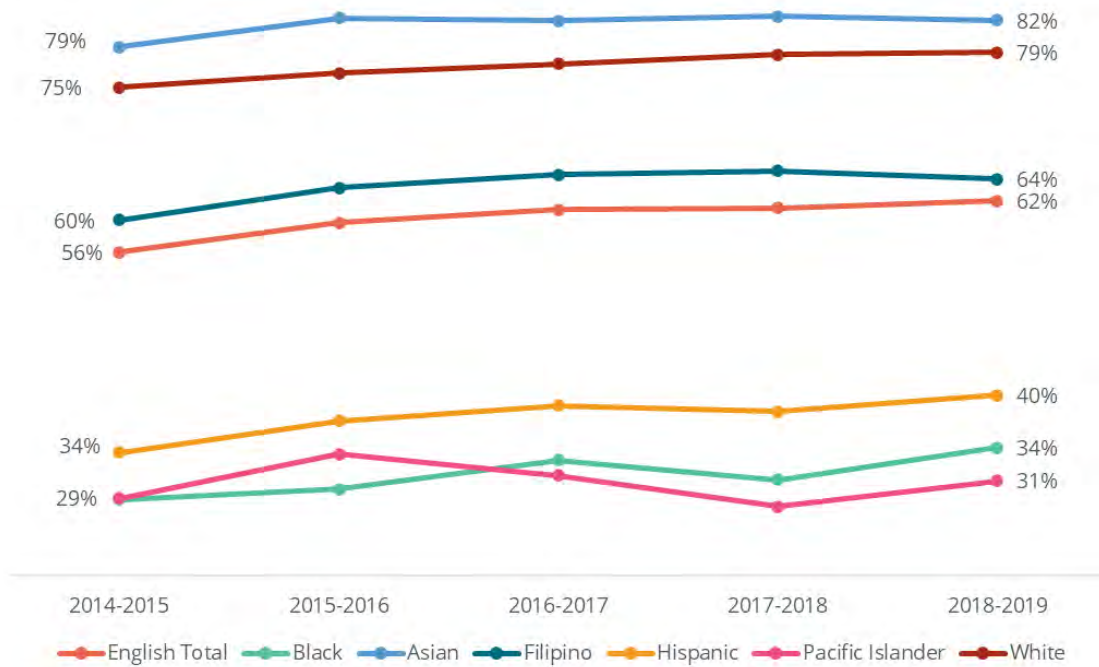
Source: California Department of Education, California Assessment of Student Performance and Progress, and Root Policy Research

Very large gaps in test scores by race and ethnicity exist among students in some areas. Figure V-16 illustrates the rate at which students of various racial and ethnic groups met or exceeded English testing standards.

For the past five years in San Mateo County, Asian, White, and Filipino students have met or exceeded English testing standards at rates higher than the overall student population. Hispanic, Black/African American, and Pacific Islander students, on the other hand, have been underserved in this realm and have consistently scored lower than the overall student body.

However, across all groups, the rate at which students met or exceed English testing standards has increased since the 2014-2015 school year. Hispanic students have made the largest percentage point gain: 34% met standards in 2014-2015 and 40% met standards in 2019-19, an increase of six percentage points.

Figure V-16.
Students who Met or Exceeded English Testing Standards, by Race and Ethnicity, 2014-2015 to 2018-2019

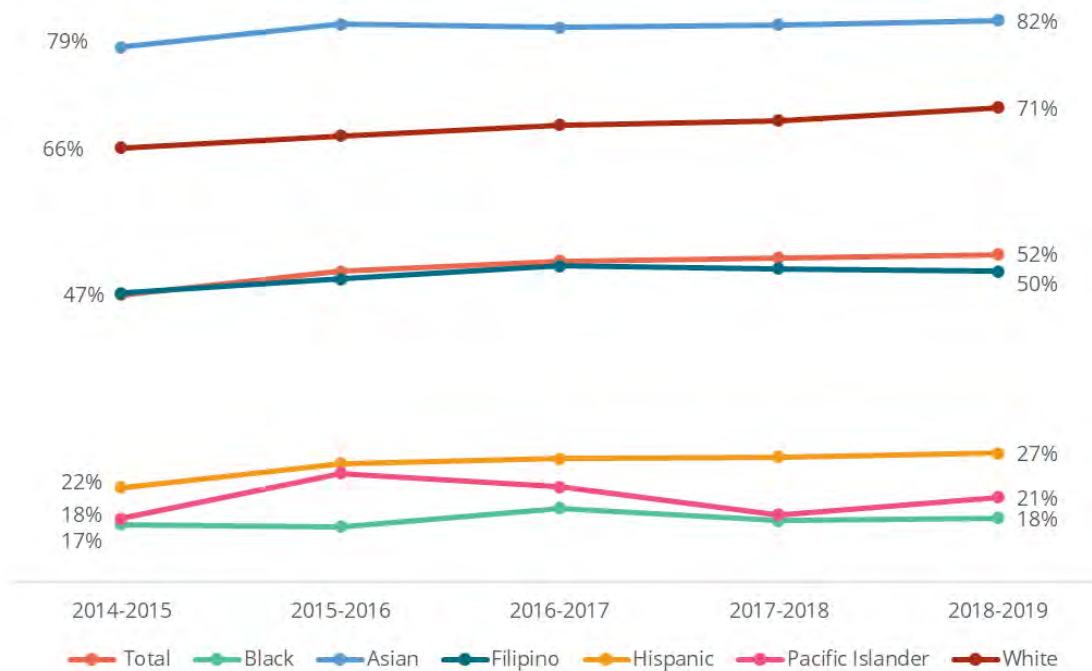


Source: California Department of Education, California Assessment of Student Performance and Progress, and Root Policy Research

A similar narrative holds in Math testing standards, where scores have improved among each racial and ethnic group from 2014-2015 to 2018-2019. Again, White and Asian students meet or exceed math testing standards at rates higher than the overall population while Hispanic, Pacific Islander, and Black/African American students scored lower.

White and Hispanic students have seen the biggest increases in rates of mathematics success: both have experienced a five percentage point increase in the percent of students who met or exceeded math testing standards.

Figure V-17.
Students who Met or Exceeded mathematics testing standards, by Race and Ethnicity, 2014-2015 to 2018-2019



Source: California Department of Education, California Assessment of Student Performance and Progress, and Root Policy Research

Figure V-18 illustrates the rates at which students of various racial and ethnic groups met or exceeded mathematics testing standards by district.

There were several districts in which the gaps between the overall test pass rates and a specific racial groups’ pass rates were especially wide. For instance, in San Carlos Elementary School District, 75% of the total student body met or exceeded math testing standards, but only 11% of Black/African American students met or exceeded math testing standards— a gap of 64 percentage points.

Other school districts with wide gaps between Black/African American and overall math testing success were Las Lomas Elementary (46 percentage point gap), Menlo Park City Elementary (43 percentage point gap), and Belmont-Redwood Shores (42 percentage point gap).

Some school districts also had similar gaps in Pacific Islander students’ math passing rates and overall passing rates. For instance, in Menlo Park City Elementary School District, 83% of the student body met or exceeded mathematics testing standards but just 35% of Pacific Islander students passed or exceeded mathematics testing standards—a gap of 48

percentage points. Millbrae Elementary School District also had a 47 percentage point gap between Pacific Islander students' and total students' math test rates.

Figure V-18.
Students who Met or Exceeded Mathematics Testing Standards, by Race/Ethnicity and District, 2018-2019

School District	Overall	Asian	Black	Filipino	Hispanic	Pacific Islander	White
Unified School Districts							
Cabrillo Unified	34%	65%	(no data)	38%	16%	(no data)	54%
La Honda-Pescadero	31%	(no data)	(no data)	(no data)	20%	(no data)	46%
South San Francisco	44%	75%	19%	60%	29%	33%	46%
High & Elementary School Districts							
Jefferson Union High School	37%	75%	(no data)	36%	17%	(no data)	42%
Bayshore Elementary	27%	44%	(no data)	38%	17%	14%	(no data)
Brisbane Elementary	54%	67%	(no data)	65%	38%	(no data)	60%
Jefferson Elementary	37%	61%	15%	42%	23%	20%	30%
Pacifica	57%	74%	38%	48%	38%	(no data)	66%
San Mateo Union High School	50%	84%	(no data)	46%	22%	20%	63%
Burlingame Elementary	78%	92%	53%	66%	50%	(no data)	81%
Hillsborough Elementary	85%	92%	(no data)	(no data)	76%	(no data)	82%
Millbrae Elementary	58%	75%	31%	63%	27%	11%	51%
San Bruno Park Elementary	41%	69%	23%	64%	25%	27%	50%
San Mateo-Foster City	56%	87%	30%	61%	23%	27%	69%
Sequoia Union High School	50%	81%	18%	53%	22%	11%	76%
Belmont-Redwood Shores	79%	92%	37%	77%	52%	43%	79%
Las Lomas Elementary	82%	93%	36%	(no data)	44%	(no data)	87%
Menlo Park City Elementary	83%	94%	40%	(no data)	55%	35%	88%
Portola Valley Elementary	83%	89%	(no data)	(no data)	56%	(no data)	89%
Ravenswood City Elementary	15%	(no data)	9%	(no data)	15%	11%	(no data)
Redwood City Elementary	46%	92%	22%	76%	34%	44%	75%
San Carlos Elementary	75%	91%	11%	85%	51%	(no data)	78%
Woodside Elementary	84%	92%	(no data)	(no data)	52%	(no data)	89%
Total	52%	82%	18%	50%	27%	21%	71%

Source: California Department of Education, California Assessment of Student Performance and Progress, and Root Policy Research

Although racial gaps in English testing were less pronounced, San Carlos Elementary School District also had a wide gap between the total student body and Black/African American

students. Namely, 80% of the student body met or exceeded English testing standards, but only 19% of Black/African American students met or exceeded testing standards—a 61 percentage point gap. Las Lomas Elementary had a 41 percentage point gap between overall English testing success and Black/African American English testing success.

Other districts had large gaps between the total student body's English test scores and Pacific Islander students' test scores. Namely, in Menlo Park City Elementary School District 84% of students met or exceeded English testing standards, but only 40% of Pacific Islander students—a 44 percentage point gap.

Figure V-19.
Students who Met or Exceeded English Testing Standards, by
Race/Ethnicity and District, 2018-2019

School District	Overall	Asian	Black	Filipino	Hispanic	Pacific Islander	White
Unified School Districts							
Cabrillo Unified	48%	78%	(no data)	54%	28%	(no data)	71%
La Honda-Pescadero	43%	(no data)	(no data)	(no data)	27%	(no data)	61%
South San Francisco	52%	76%	36%	66%	38%	44%	56%
High & Elementary School Districts							
Jefferson Union High School	57%	81%	(no data)	60%	43%	(no data)	59%
Bayshore Elementary	27%	49%	(no data)	33%	20%	14%	(no data)
Brisbane Elementary	64%	63%	(no data)	75%	51%	(no data)	79%
Jefferson Elementary	48%	62%	28%	59%	34%	33%	43%
Pacifica	60%	65%	32%	52%	45%	(no data)	68%
San Mateo Union High School	70%	88%	55%	79%	50%	34%	81%
Burlingame Elementary	80%	88%	61%	73%	55%	(no data)	83%
Hillsborough Elementary	85%	89%	(no data)	(no data)	77%	(no data)	83%
Millbrae Elementary	63%	74%	46%	68%	42%	23%	61%
San Bruno Park Elementary	50%	72%	39%	76%	36%	31%	56%
San Mateo-Foster City	62%	85%	41%	68%	34%	37%	77%
Sequoia Union High School	68%	87%	44%	92%	47%	31%	88%
Belmont-Redwood Shores	82%	91%	44%	81%	64%	61%	83%
Las Lomas Elementary	86%	91%	45%	(no data)	65%	(no data)	89%
Menlo Park City Elementary	84%	92%	60%	(no data)	62%	40%	88%
Portola Valley Elementary	87%	92%	(no data)	(no data)	58%	(no data)	93%
Ravenswood City Elementary	22%	(no data)	24%	(no data)	21%	18%	(no data)
Redwood City Elementary	54%	91%	35%	73%	43%	47%	83%
San Carlos Elementary	80%	90%	19%	76%	60%	(no data)	83%
Woodside Elementary	88%	92%	(no data)	(no data)	58%	(no data)	92%
Total	62%	82%	34%	64%	40%	31%	79%

Source: California Department of Education, California Assessment of Student Performance and Progress, and Root Policy Research

Students with extenuating circumstances across all districts met or exceeded testing standards at lower rates. However, some districts had especially wide disparities between overall test scores and test scores of students with extenuating circumstances.

For example, English learning students in Portola Valley Elementary, Woodside Elementary, Menlo Park City Elementary, and Brisbane Elementary each met or exceeded mathematics test standards at a rate at least 50 percentage points below the overall test rate in each district. English learning students in Las Lomas Elementary (54%) had the highest mathematics pass rates, followed by those in Belmont-Redwood Shores (42%) and Burlingame Elementary (40%).

Students with disabilities scored especially high on mathematics tests in Hillsborough Elementary, where 48% met or exceeded standards. Others in Belmont-Redwood Shores (43%) and Woodside Elementary (41%) had high pass rates as well. Students with disabilities in San Carlos Elementary and Las Lomas Elementary school districts scored far below the overall student body: in these districts, students with disabilities met or exceeded mathematics test standards at 54 percentage points below the overall test rate.

In Jefferson Elementary and Ravenswood Elementary students experiencing homelessness passed math tests at a rate similar to their housed peers. In other districts, however, students experiencing homelessness often scored substantially lower. School districts with the widest math testing gaps between the overall student body and students experiencing homelessness were San Mateo-Foster City and Millbrae Elementary, with a 41 percentage point gap and 42 percentage point gap, respectively.

Figure V-20.
Students who Met or Exceeded Math Testing Standards, by Special Case
and District, 2018-2019

School District	Overall	English Learners	Experiencing homelessness	Migrant	With Disabilities
Unified School Districts					
Cabrillo Unified	34%	4%	5%	4%	9%
La Honda-Pescadero	31%	4%	(no data)	(no data)	2%
South San Francisco	44%	20%	25%	4%	18%
High & Elementary School Districts					
Jefferson Union High School	37%	5%	(no data)	(no data)	6%
Bayshore Elementary	27%	11%	(no data)	(no data)	9%
Brisbane Elementary	54%	4%	(no data)	(no data)	12%
Jefferson Elementary	37%	15%	36%	(no data)	11%
Pacifica	57%	22%	(no data)	(no data)	17%
San Mateo Union High School	50%	10%	(no data)	(no data)	13%
Burlingame Elementary	78%	40%	(no data)	(no data)	29%
Hillsborough Elementary	85%	(no data)	(no data)	(no data)	48%
Millbrae Elementary	58%	26%	16%	(no data)	25%
San Bruno Park Elementary	41%	12%	(no data)	(no data)	9%
San Mateo-Foster City	56%	11%	15%	(no data)	14%
Sequoia Union High School	50%	3%	33%	(no data)	9%
Belmont-Redwood Shores	79%	42%	(no data)	(no data)	43%
Las Lomas Elementary	82%	54%	(no data)	(no data)	28%
Menlo Park City Elementary	83%	31%	(no data)	(no data)	38%
Portola Valley Elementary	83%	14%	(no data)	(no data)	39%
Ravenswood City Elementary	15%	5%	11%	(no data)	2%
Redwood City Elementary	46%	14%	(no data)	29%	14%
San Carlos Elementary	75%	24%	(no data)	(no data)	21%
Woodside Elementary	84%	27%	(no data)	(no data)	41%

Source: California Department of Education, California Assessment of Student Performance and Progress, and Root Policy Research

Students with extenuating circumstances also consistently scored lower in English testing than the overall student body.

For instance, English learning students in San Mateo Union High School District, Hillsborough Elementary School District, Sequoia Union High School District, Menlo Park City Elementary School District, and Portola Valley Elementary School District met or exceeded English test standards at a rate at least 60 percentage points below the overall test rate in each district. Hillsborough Elementary had the largest gap at 85 percentage points. Las Lomas Elementary had the highest success rate among English learners, where 50% met or exceeded English testing standards.

However, students with disabilities in Las Lomas Elementary and San Carlos Elementary school districts met or exceeded English test standards at rate 55 and 51 percentage points below the overall test rate, respectively. These were the largest gaps in the county. Students with disabilities at Woodside Elementary did the best on English testing, where 56% passed or exceeded standards.

Among students experiencing homelessness, those at Sequoia Union High School were most likely to meet English testing standards, with 42% meeting or exceeding standards. The school district with the widest gap between overall English test scores and scores among students experiencing homelessness was Cabrillo Unified with a 34 percentage point gap.

Just three districts reported English testing scores among migrant students. Redwood City Elementary had the highest pass rate at 34% and Cabrillo Unified had the lowest at 16%.

Figure V-21.
Students who Met or Exceeded English Testing Standards, by Special Case and District, 2018-2019

School District	Overall	English Learners	Experiencing homelessness	Migrant	With Disabilities
Unified School Districts					
Cabrillo Unified	48%	9%	14%	16%	12%
La Honda-Pescadero	43%	9%	(no data)	(no data)	9%
South San Francisco	52%	21%	35%	20%	18%
High & Elementary School Districts					
Jefferson Union High School	57%	3%	(no data)	(no data)	19%
Bayshore Elementary	27%	3%	(no data)	(no data)	4%
Brisbane Elementary	64%	21%	(no data)	(no data)	16%
Jefferson Elementary	48%	16%	30%	(no data)	15%
Pacifica	60%	12%	(no data)	(no data)	15%
San Mateo Union High School	70%	11%	(no data)	(no data)	27%
Burlingame Elementary	80%	33%	(no data)	(no data)	33%
Hillsborough Elementary	85%	(no data)	(no data)	(no data)	47%
Millbrae Elementary	63%	19%	34%	(no data)	23%
San Bruno Park Elementary	50%	14%	(no data)	(no data)	12%
San Mateo-Foster City	62%	9%	33%	(no data)	15%
Sequoia Union High School	68%	8%	42%	(no data)	27%
Belmont-Redwood Shores	82%	31%	(no data)	(no data)	45%
Las Lomas Elementary	86%	51%	(no data)	(no data)	31%
Menlo Park City Elementary	84%	21%	(no data)	(no data)	42%
Portola Valley Elementary	87%	17%	(no data)	(no data)	37%
Ravenswood City Elementary	22%	6%	16%	(no data)	5%
Redwood City Elementary	54%	13%	(no data)	34%	16%
San Carlos Elementary	80%	29%	(no data)	(no data)	28%
Woodside Elementary	88%	18%	(no data)	(no data)	56%

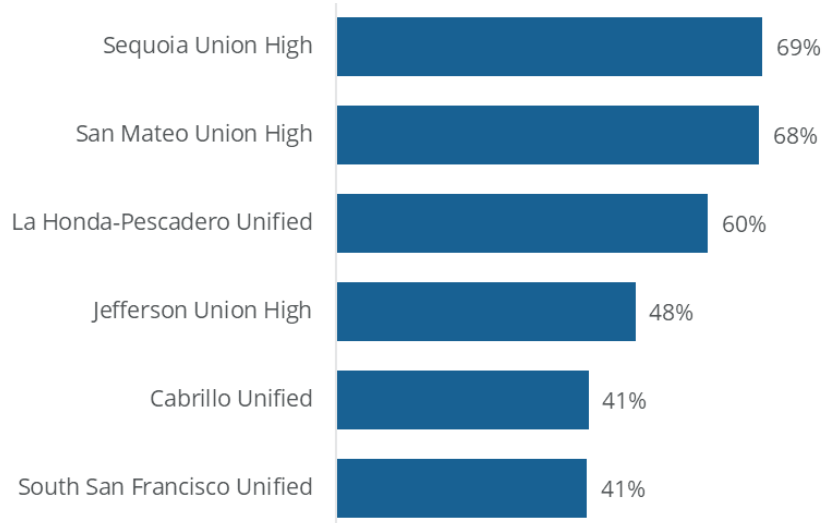
Source: California Department of Education, California Assessment of Student Performance and Progress, and Root Policy Research

Students who met university requirements. Many high schoolers in the county met admission standards for a University of California (UC) or California State University (CSU) school. Figure V-22 illustrates the percentage of cohort graduates who met admission requirements for a CSU or UC school according to California Department of Education data.

Of the high school districts in San Mateo County, Sequoia Union had the highest rate of graduates who met such admission standards, at 69%. On the other end of the spectrum, Cabrillo Unified and South San Francisco Unified had the lowest rates at 41%.

Figure V-22.
Students Meeting
California University
Admission
Standards, 2019-
2020

Source:
California Department of Education
and Root Policy Research.



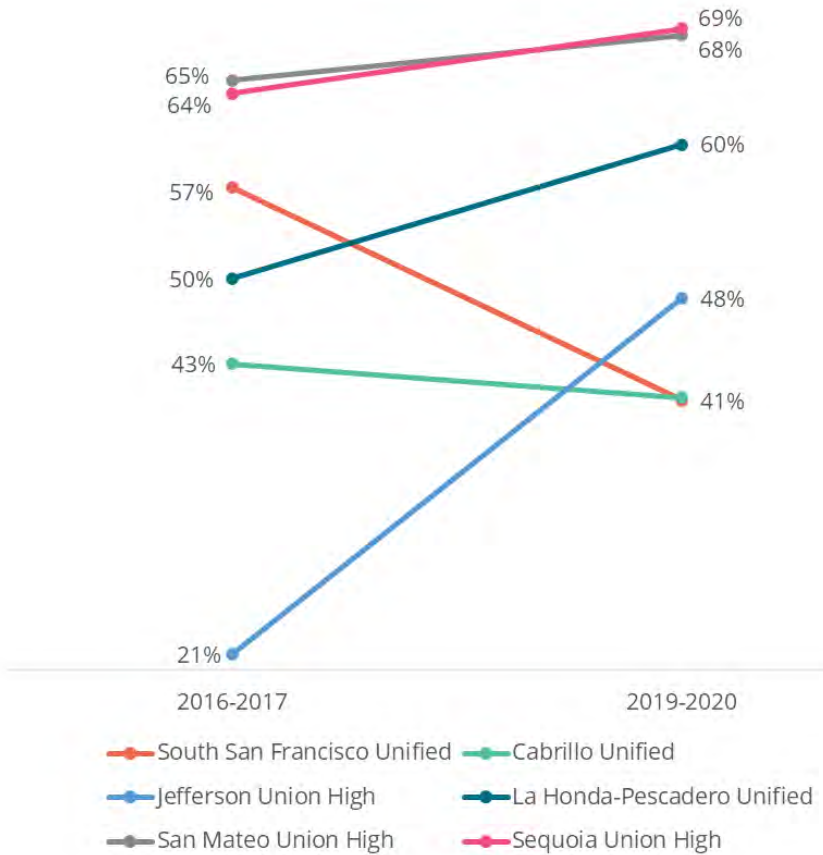
Cabrillo Unified and South San Francisco Unified have experienced a decrease in the share of graduates meeting CSU or UC admission standards in recent years. For instance, in 2016-2017, 57% of South San Francisco Unified graduates met these standards, but this decreased by 16 percentage points by 2019-2020. Cabrillo Unified experienced a less drastic decrease over the same period, but the rate still shrunk by two percentage points.

Jefferson Union High School District had the most drastic increase in the share of graduates meeting CSU or UC standards: just 21% of students met these standards in 2016-2017 compared to 48% of students in 2019-2020. La Honda-Pescadero Unified School District experienced a 10 percentage point increase in this success rate over the same period.

Sequoia Union and San Mateo Union experienced more modest increases, but remain the districts with the highest rates of students meeting CSU and UC standards.

**Figure V-23.
Students Meeting
University
Admission
Standards, 2016-
2017 and 2019-2020**

Source:
California Department of Education
and Root Policy Research.



Rates at which students met CSU or UC admissions standards varied substantially by race and ethnicity in 2019-2020. In all high school districts in San Mateo County, White and Asian students meet CSU and UC admissions standards at higher rates than the overall student population.

The largest gap is in South San Francisco Unified, where just 41% of students meet CSU or UC admissions standards, but 73% of Asian students meet those standards—a 32 percentage point gap.

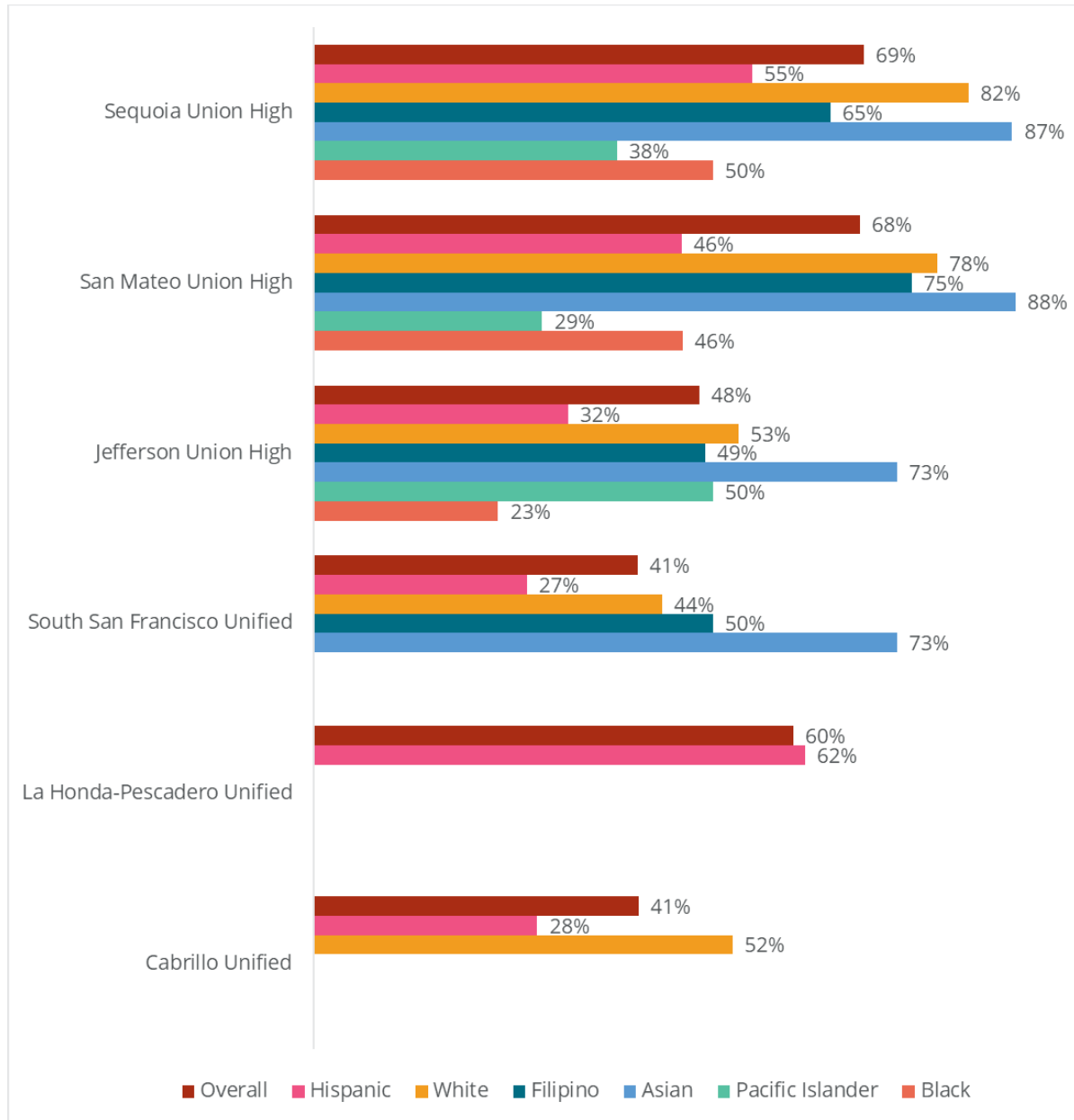
On the other end of the spectrum, Black/African American students typically met CSU or UC admissions standards at lower-than-average rates. The largest gap was in San Mateo Union, where just 29% of Black/African American students met CSU or UC standards compared to 68% of students in the district overall.

Filipino students typically met admissions standards at rates similar to the overall student body. For instance, in Jefferson Union, San Mateo Union, and South San Francisco Unified, Filipino students are slightly more likely to have met CSU and UC standards than the overall student population. In Sequoia Union, they are slightly less likely to have met admission standards than the overall student population.

In La Honda-Pescadero, Hispanic students are slightly more likely to have met CSU or UC standards than the overall student body. However, in all other school districts, Hispanic students are less likely to have met CSU and UC standards than the overall student body. The largest disparity is in San Mateo Union, where just 46% of Hispanic students meet the university admissions standards compared to 68% of students overall.

Finally, Pacific Islander students in Jefferson Union were slightly more likely to have met California university admissions standards compared to the overall student body, but in Sequoia Union and San Mateo Union they were substantially less likely.

Figure V-24.
Students Meeting University Admission Standards, by Race and Ethnicity,
2019-2020



Source: California Department of Education and Root Policy Research

As expected, students with extenuating circumstances were less likely to meet CSU or UC admissions standards than students in the county overall. In all school districts where data are available, students with disabilities, students experiencing homelessness, English learners, foster youth, and migrant students met CSU or UC admission standards at lower rates than the overall student population.

English learners in Sequoia Union and San Mateo Regional met CSU or UC admission standards at higher rates than their peers in other school districts. However, compared to the overall student body within their own school districts, they had a larger gap than other districts. Namely, in Sequoia Union, 69% of students met admissions standards compared to just 32% of students learning English— a 37 percentage point gap.

Similarly, students with disabilities in Sequoia Union had the highest rate of meeting admissions standards (31%) compared to peers with disabilities in other districts, but also had the largest gap (38 percentage points) compared to the district's overall student body.

Migrant students met admission standards at the lowest rate in South San Francisco Unified (27%) and at the highest rate in Sequoia Union (45%). However, in Cabrillo Unified, their rates were only eight percentage points lower than that of the overall student body, the smallest gap in the county.

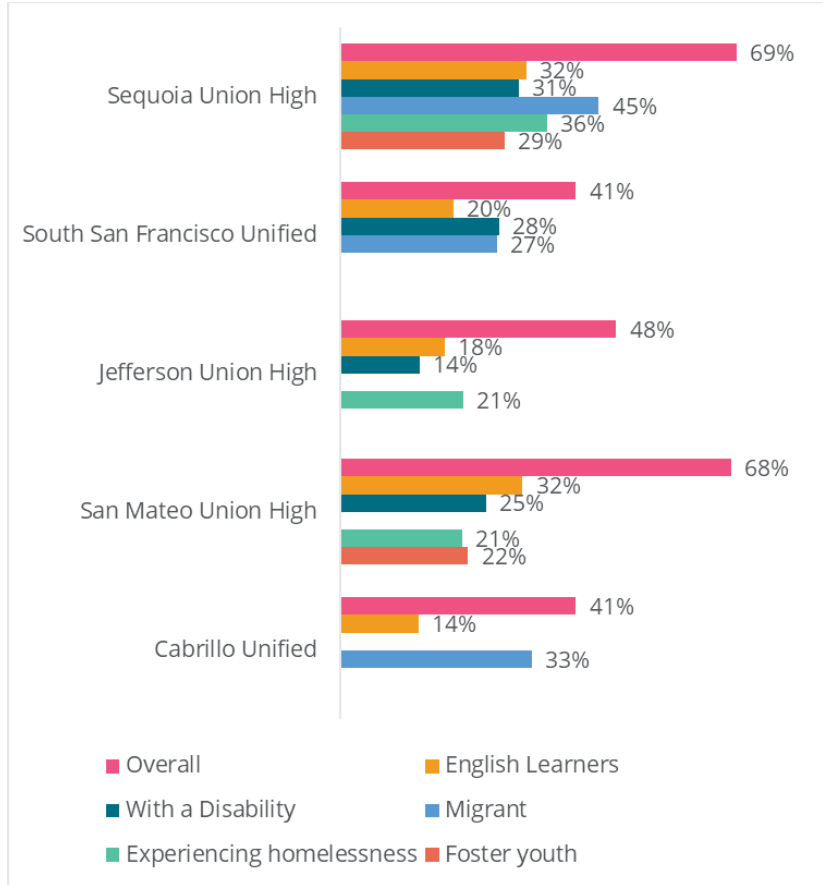
Approximately 36% of students experiencing homelessness in Sequoia Union met CSU or UC admission standards, which was higher than rates in San Mateo Union (21%) and Jefferson Union (21%).

Just San Mateo Union and Sequoia Union had enough foster youth to report their rate of meeting CSU or UC admission standards. In Sequoia Union, 29% met admissions standards and 22% in San Mateo Union met admissions standards.

**Figure V-25.
Students Meeting
University
Admission
Standards, 2019-
2020**

Source:
California Department of Education
and Root Policy Research.

Notes: La-Honda Pescadero Unified
is excluded from these data as they
do not report admission standards
data for these special groups, likely
due to small sample size.

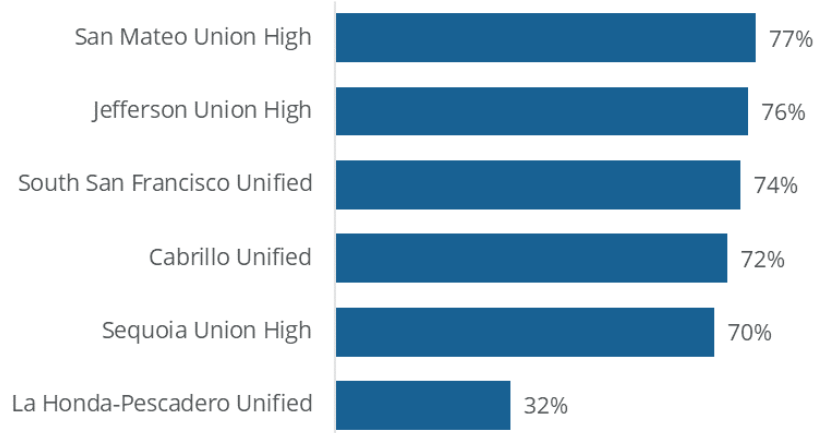


College-going rates. The college-going rate is defined as the percentage of public high school students who completed high school in a given year and subsequently enrolled in any public or private postsecondary institution (in-state or out-of-state) in the United States within 12 or 16 months of completing high school.

Most school districts in the county have a college-going rate at 70% or higher. San Mateo Union had the highest college-going rate at 77%. La Honda-Pescadero School District is the notable exception, with just 32% of graduates attending college within 12 or 16 months.

Figure V-26.
College-Going
Rates, 2017-2018

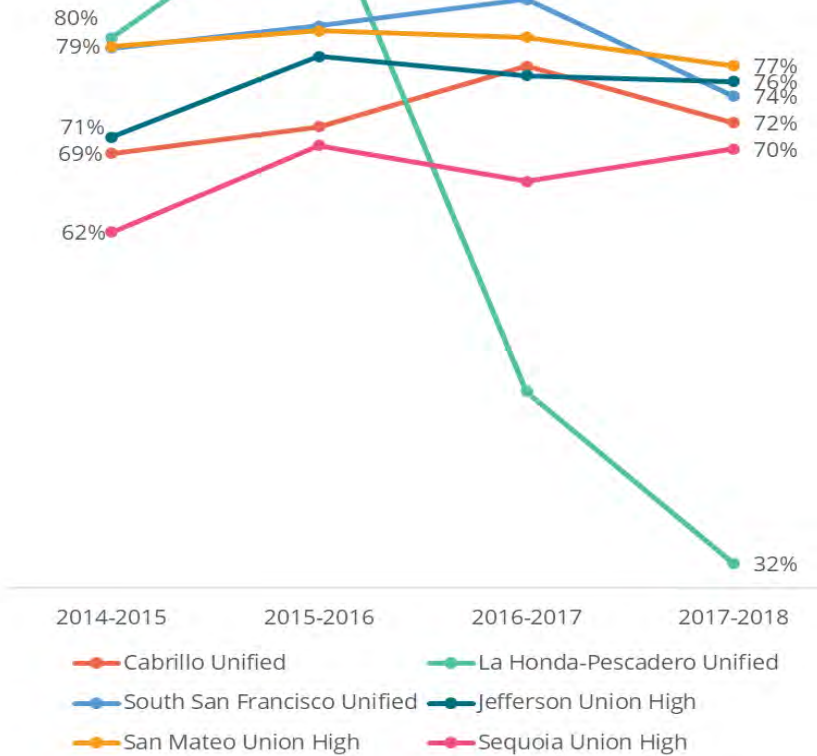
Source:
California Department of Education
and Root Policy Research.



As shown in Figure V-27, La Honda-Pescadero School District previously had the highest college-going rate of all the county's high school districts, with an 80% college-going rate in 2014-2015 and a 93% college-going rate in 2015-2016. The district experienced a rapid decline in college-going rates, starting in 2016-2017. However, La Honda-Pescadero has especially small sample sizes. For instance, the district had just 26 twelfth-graders in the 2017-2018 school year, meaning that just a couple students going to college (or not) drastically alters the college-going rate in La Honda-Pescadero. All other high school districts in the county have maintained relatively consistent college-going rates.

**Figure V-27.
College-Going
Rates, 2014-2015 to
2017-2018**

Source:
California Department of Education
and Root Policy Research.

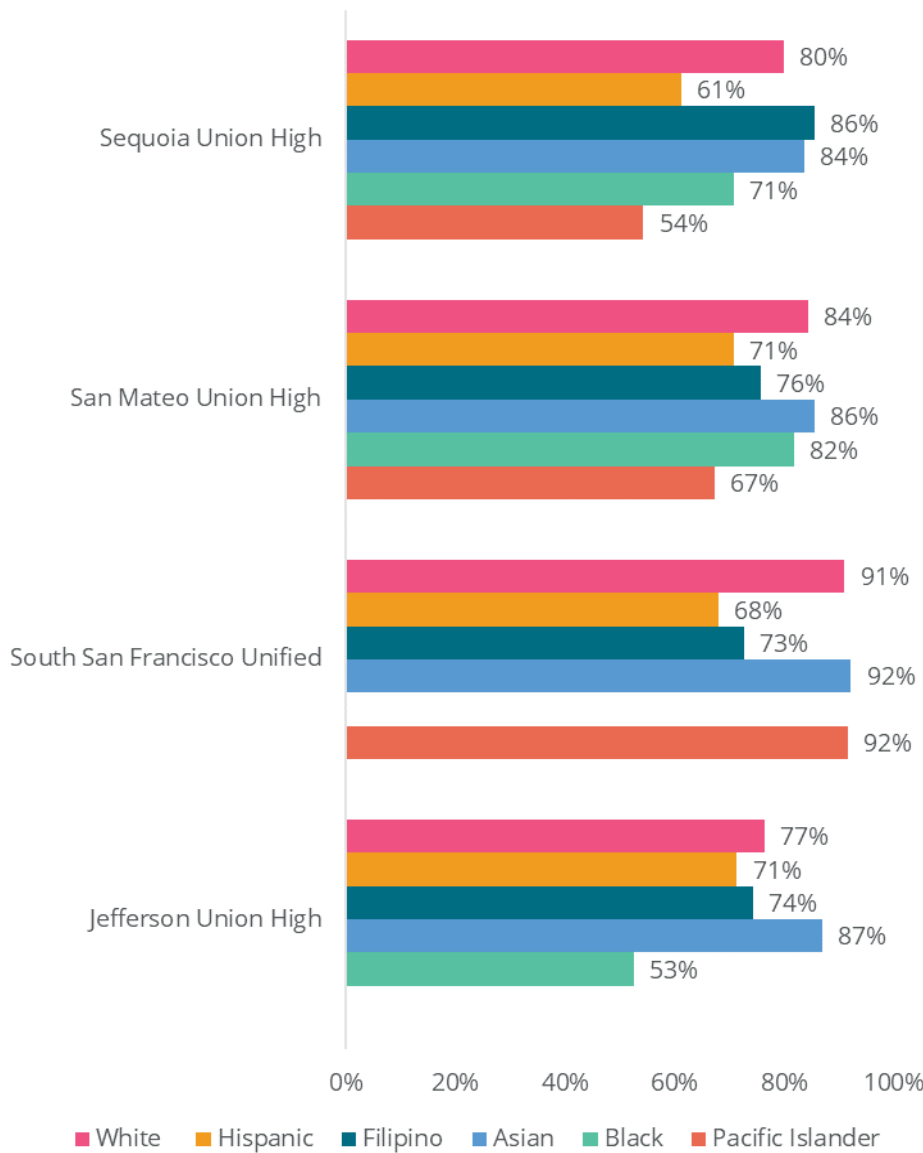


Within each of the high school districts, college-going rates vary by race and ethnicity.

- In every district, White students have a higher college-going rate than Hispanic students, but the largest gaps are in South San Francisco Unified, where 91% of White students go to college compared to just 68% of Hispanic students, a 23 percentage point gap. Jefferson Union has the smallest gap between the two groups: 77% of White students go to college compared to 71% of Hispanic students.
- Among Black/African American students, those at San Mateo Union have the highest college-going rate at 82%. Those at Jefferson Union have the lowest at just 53%, which is 24 percentage points lower than that of White students and 34 percentage points lower than that of Asian students.
- Overall, Asian students have among the highest college-going-rates in the county. The rate is especially high in South San Francisco Unified, where 92% go to college. The rate is lowest in Sequoia Union High School District, where 84% go to college.

- Filipino students also have generally high rates of college-going. The highest college-going rate among Filipino students is in Sequoia Union (86%) and the lowest is in South San Francisco Unified (73%).
- College-going rates for Pacific Islander students vary substantially by district. For instance, in Sequoia Union 54% go to college, but in South San Francisco Unified 92% go to college.

Figure V-28.
College-going Rates by Race and Ethnicity, 2017-18



Note: Cabrillo Unified and La Honda- Pescadero Unified are not included here because they do not report the data, likely due to small sample sizes.

Source: California Department of Education and Root Policy Research

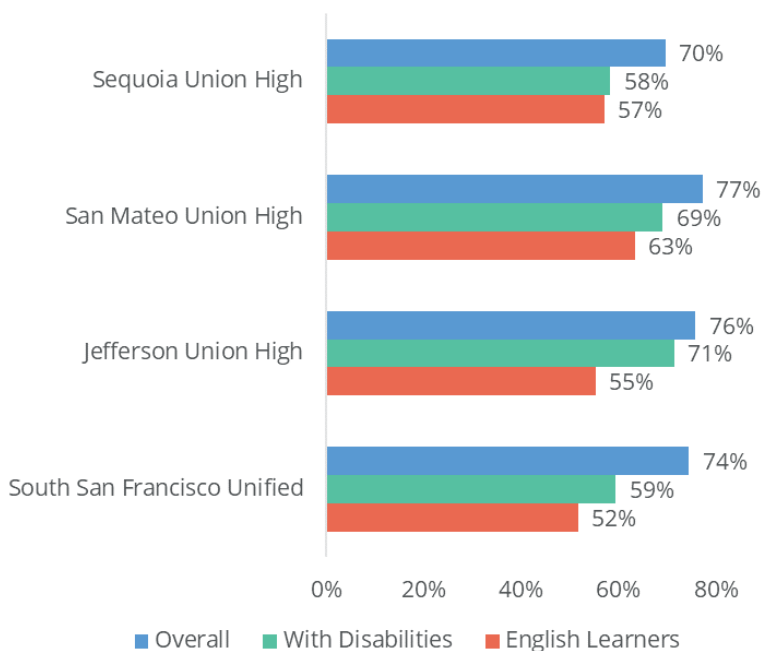
College-going rates are lower for students with disabilities and those learning English compared to the overall student population across the county.

- 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.

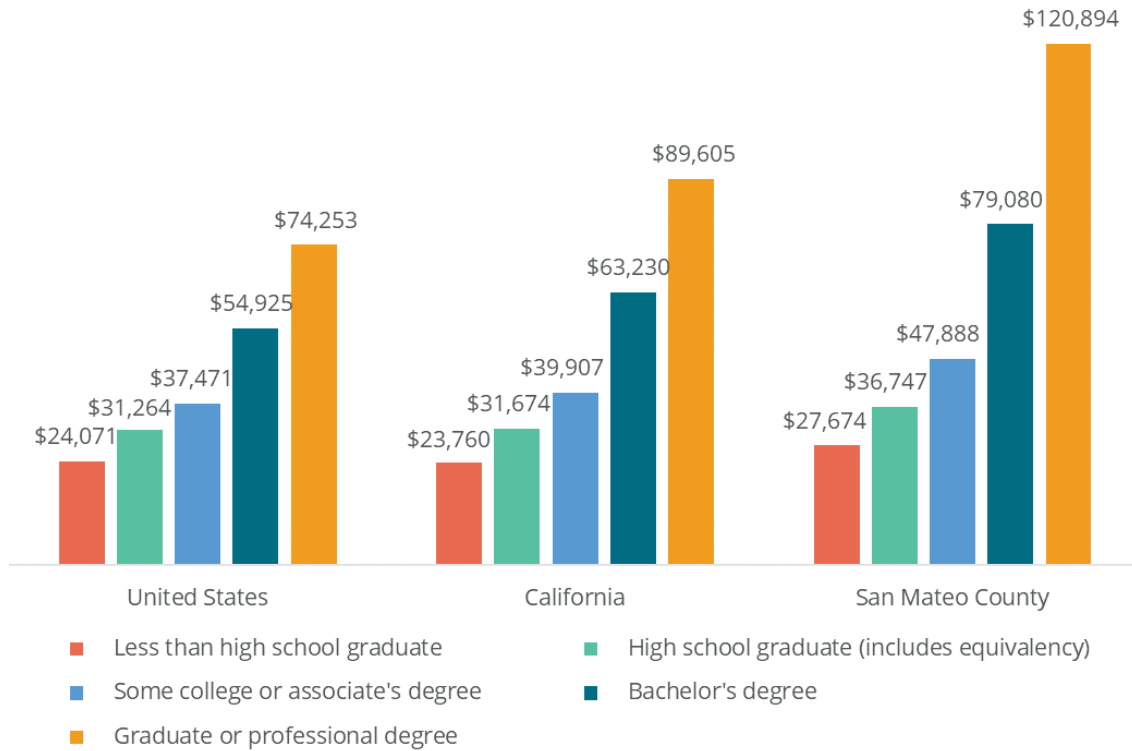
Source:
 California Department of Education and Root Policy Research.



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.

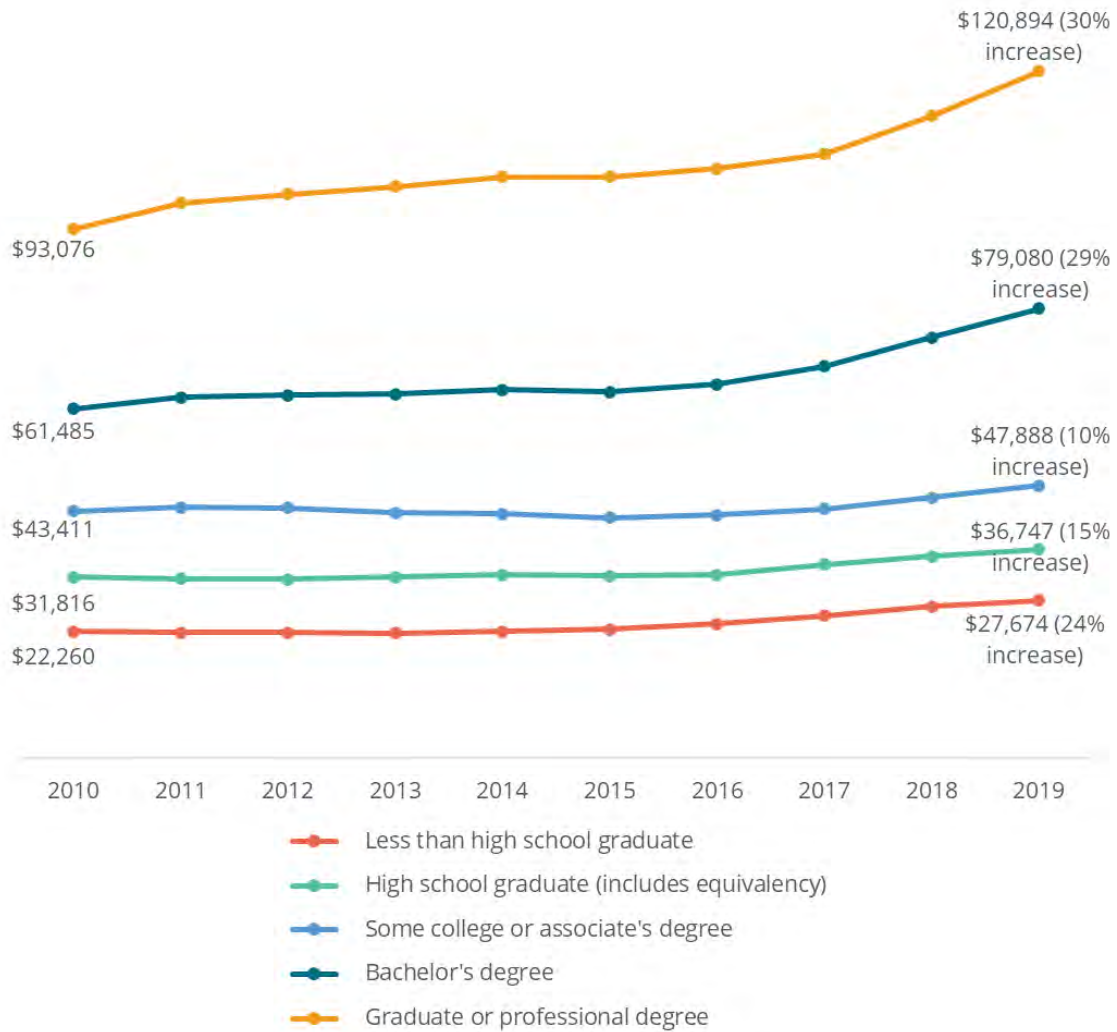
Figure V-30.
Median Annual Earnings by Educational Attainment, 2019



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.

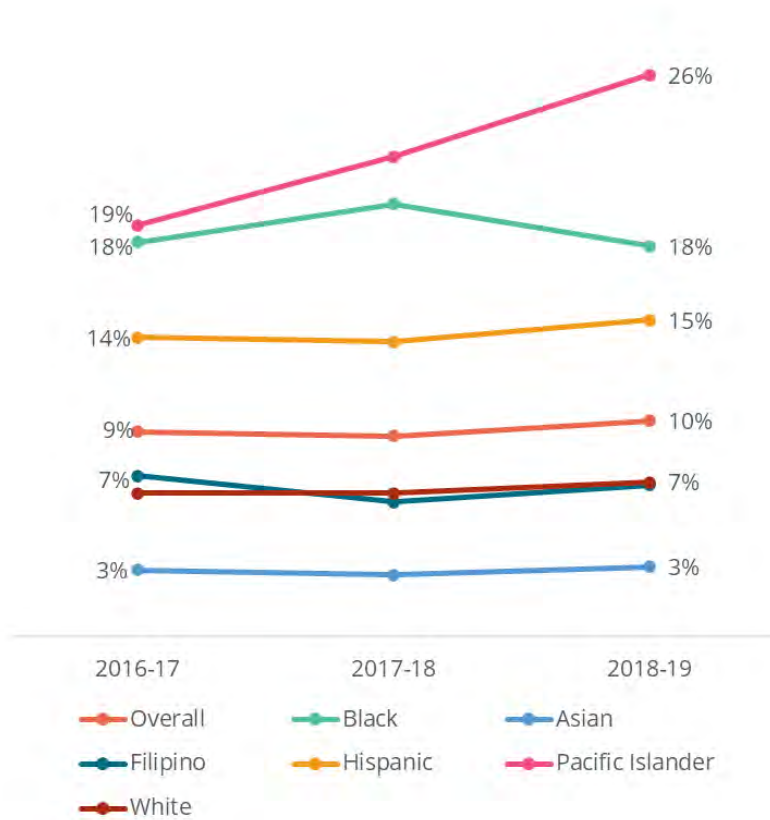
¹² Gottfried, Michael A. "Chronic absenteeism and its effects on students' academic and socioemotional outcomes." *Journal of Education for Students Placed at Risk (JESPAR)* 19.2 (2014): 53-75.

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 Lomas 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).

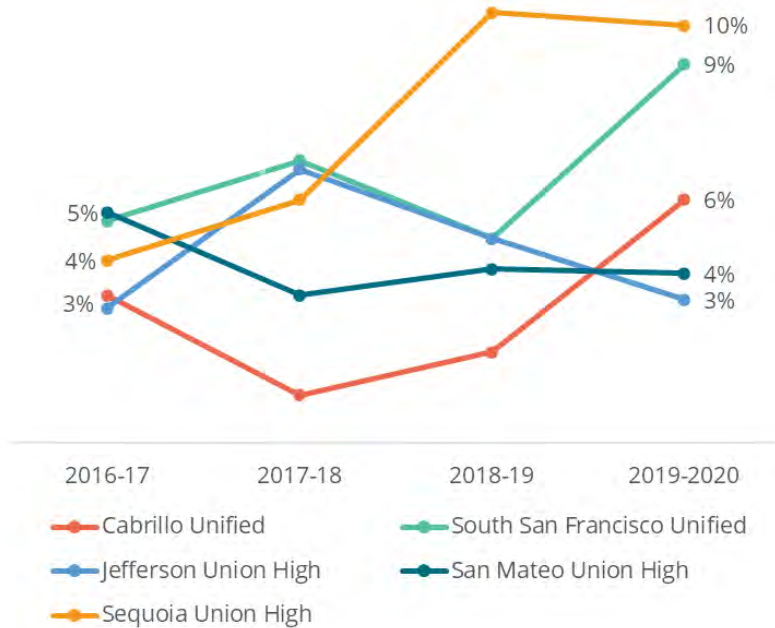
¹⁶ U.S. Department of Justice, Bureau of Justice Statistics. (2002). Correctional populations in the United States, 1998 (NCJ-192929). Washington: U.S. Government Printing Office.

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

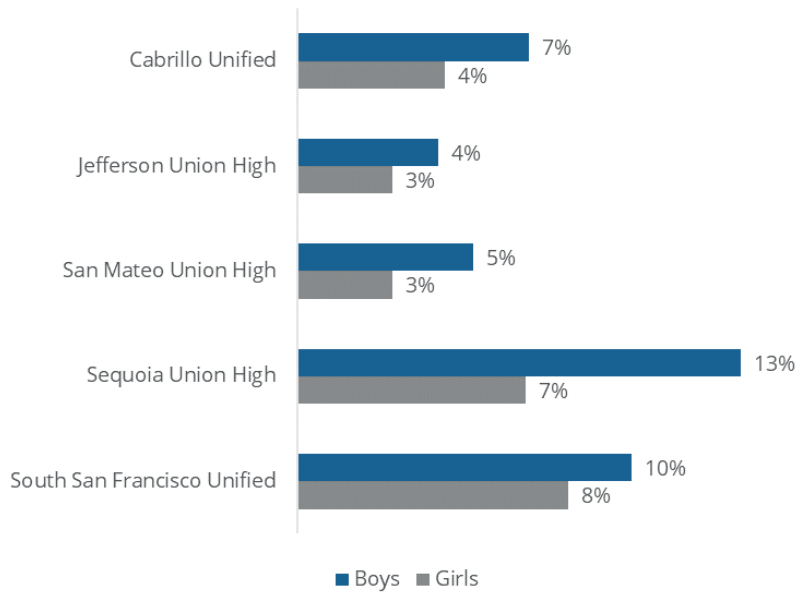


In all school districts in the county, dropout rates are higher for boys than for girls. Jefferson Union had the smallest gender gap, where 3% of girls dropped out and 4% of boys dropped out. Sequoia Union had the widest gender gap, where 13% of boys dropped out compared to just 7% of girls.

**Figure V-36.
Dropout Rates by
Gender, 2019-2020**

Note: La Honda-Pescadero Unified School District is excluded from these data.

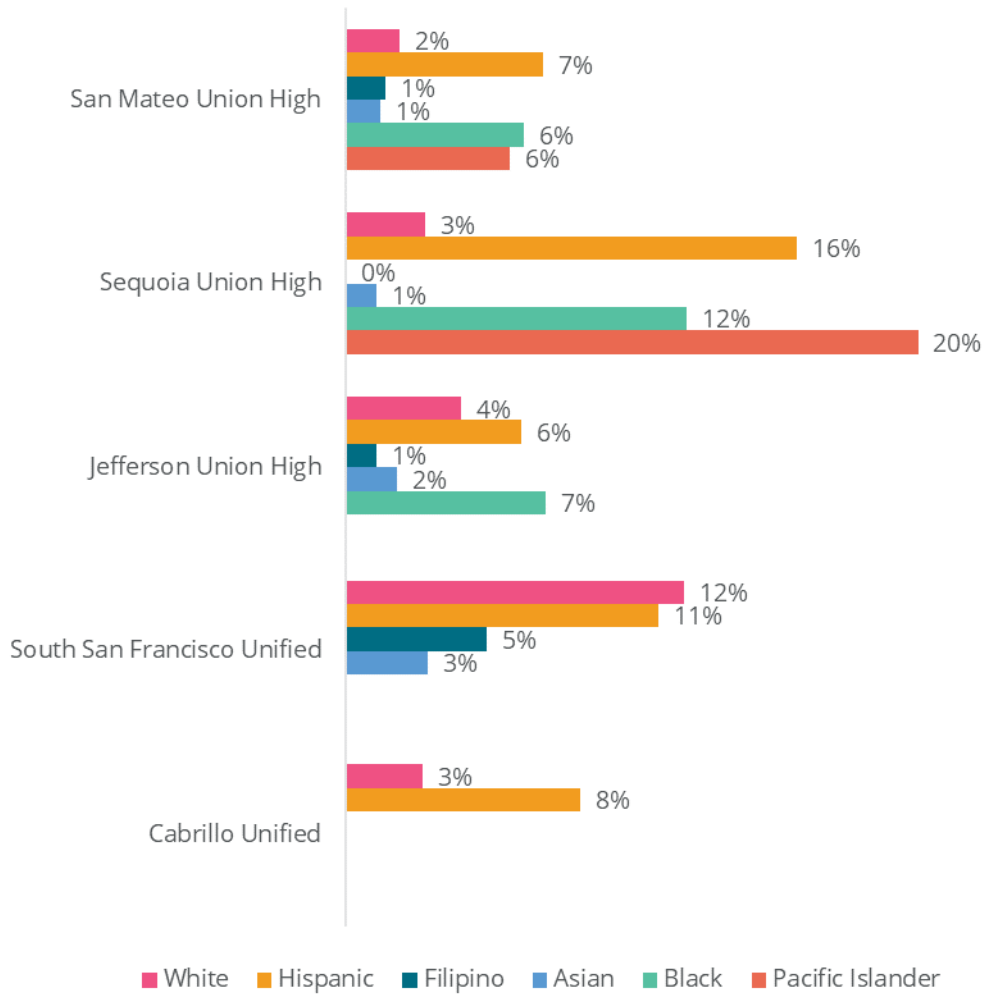
Source: California Department of Education and Root Policy Research



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**



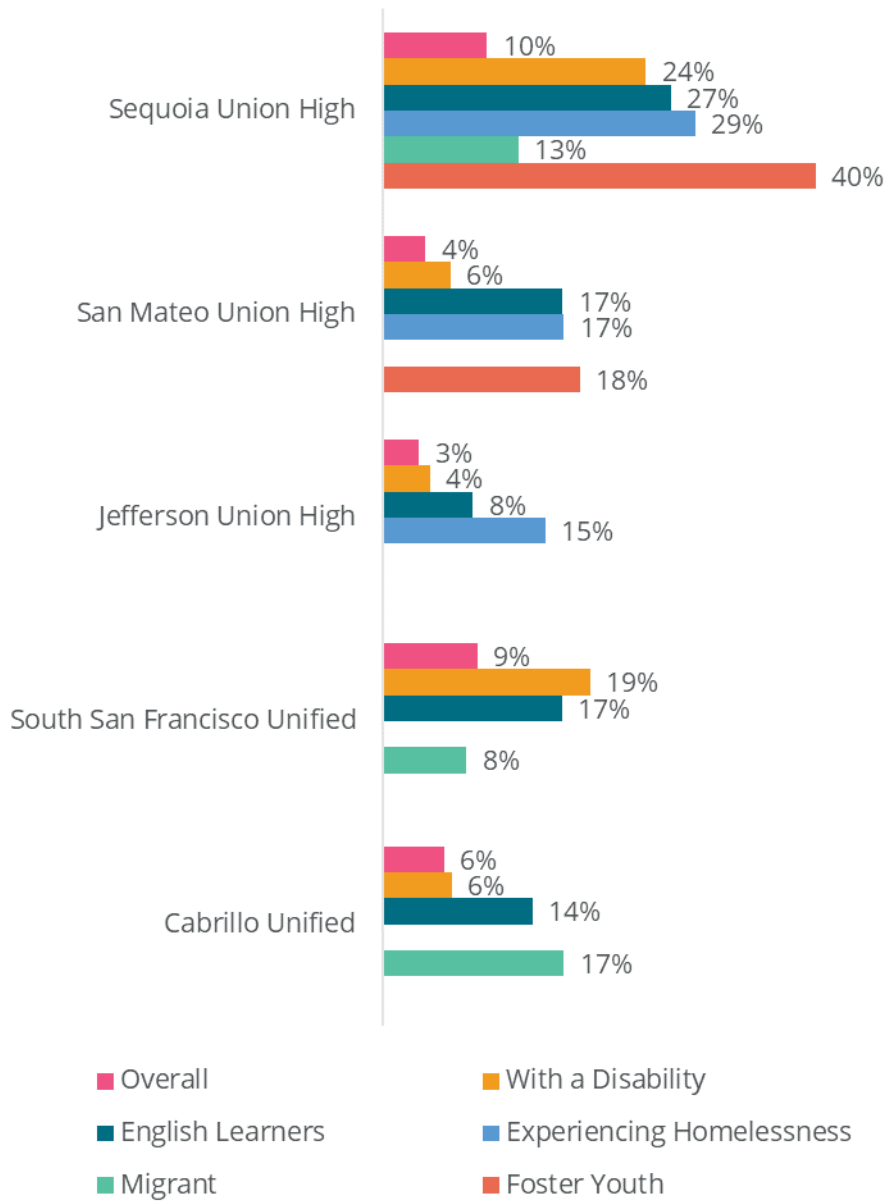
Source: California Department of Education and Root Policy Research

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 at 40%. San Mateo Union is the only other district in the county which reported these data in 2019-2020, and found only 18% of foster youth dropped out.
- Migrant students at South San Francisco Unified actually dropped out at a rate slightly lower than the general student body: just 8% of migrant students dropped out compared to 9% of the overall student body. However, those in Cabrillo Unified were 11 percentage points more likely than the total student body to dropout.

Figure V-38.
Dropout Rates by Extenuating Circumstance, 2019-2020



Source: California Department of Education and Root Policy Research

Disproportionate discipline rates. Strict discipline policies may stigmatize suspended students and expose them to the criminal justice system at a young age, setting them up for limited economic and social success down the line. Research has found that suspensions not only negatively affect the suspended students, but also their peers.

Students in schools with higher suspension rates are more likely to drop out of school and less likely to attend a four-year college.¹⁸

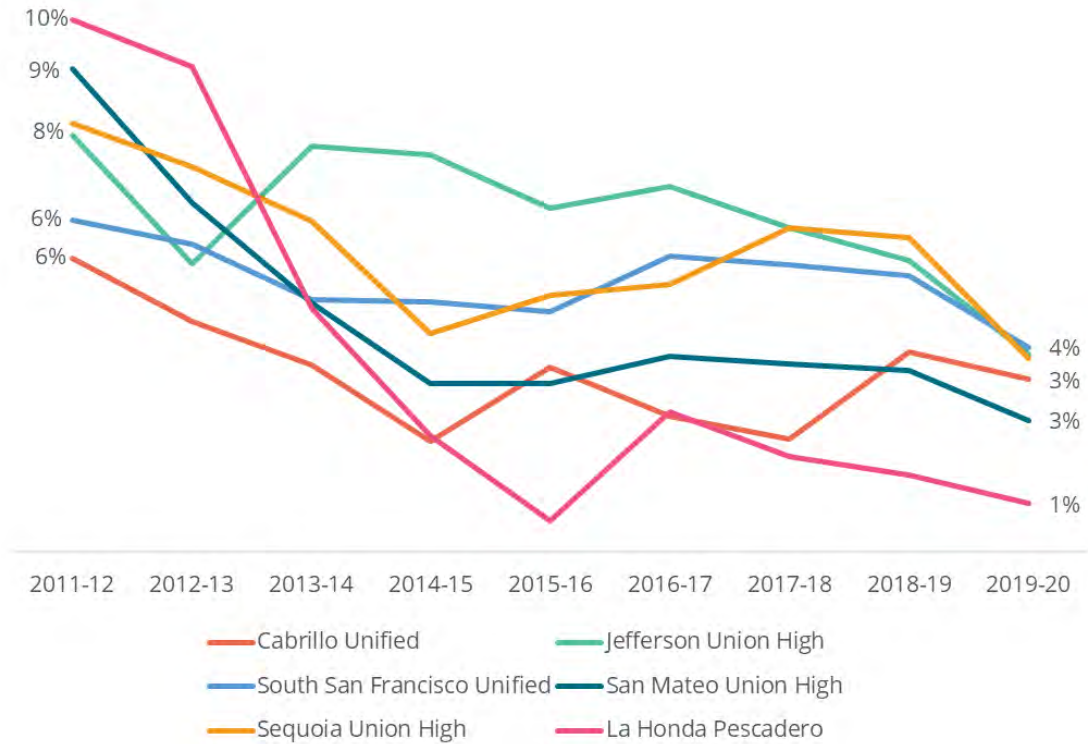
Other academic studies have found that students from African American and Latino families are more likely than their White peers to receive expulsion or out of school suspension as consequences for the same or similar problem behavior.¹⁹ This means that Black/African American and Hispanic students suffer more of the economic and social consequences than their White peers for the same behaviors.

Luckily, in every high school district in San Mateo County, suspension rates have decreased since 2011-2012. La Honda-Pescadero School District experienced the largest decrease: it was the district with the highest suspension rate in 2011-2012 at 10%, but now has the lowest suspension rate at just 1% in 2019-2020. San Mateo Union also experienced a rapid decrease in suspension rates over the same period, with a rate of 9% in 2011-2012 to a rate of 3% in 2019-2020.

¹⁸ Bacher-Hicks, Andrew, Stephen B. Billings, and David J. Deming. The school to prison pipeline: Long-run impacts of school suspensions on adult crime. No. w26257. National Bureau of Economic Research, 2019.

¹⁹ Skiba, Russell J., et al. "Race is not neutral: A national investigation of African American and Latino disproportionality in school discipline." *School Psychology Review* 40.1 (2011): 85-107.

Figure V-39.
Suspension Rates, 2011-2012 to 2019-2020



Source: California Department of Education and Root Policy Research

In many school districts across San Mateo County, Hispanic students are disciplined at disproportionately higher rates compared to their peers. Figure V-40 compares each racial/ethnic group’s share of suspensions to their share of the overall student population.

- In all districts except for La Honda-Pescadero, Hispanic students make up a larger share of suspensions than their overall share of the student body. For instance, in San Mateo Union, 34% of students are Hispanic, but 66% of suspended students are Hispanic, making a 32 percentage point overrepresentation gap.
- In most districts, Black and Pacific Islander students are also overrepresented in terms of suspension rates, but these rates are slight compared to those of Hispanic students. For instance, in Sequoia Union, just 2% of the student body identified as Pacific Islander but 8% of suspended students were Pacific Islander.
- Asian and Filipino students were *underrepresented* in terms of suspension rates. For example, in Jefferson Union High School District, 31% of students identified as Filipino but just 10% of suspended students were Filipino, a 21 percentage point

gap. In San Mateo Union High School, 22% of students identified as Asian but just 5% of suspended students were Asian, a 17 percentage point gap.

- White students were also underrepresented in discipline rates in most districts except for La Honda-Pescadero, where they were overrepresented by 30 percentage points. They were substantially underrepresented in Cabrillo Unified (with a gap of 21 percentage points) and Sequoia Union (18 percentage points).

Figure V-40.
Suspension Rates by Race and Ethnicity, 2019-2020

School District	Cabrillo Unified	Jefferson Union High	La Honda-Pescadero	San Mateo Union High	Sequoia Union High	South San Francisco Unified
Asian Students						
Share of Student Body	1%	14%		22%	9%	13%
Share of Suspensions	1%	7%		5%	1%	3%
Gap	0%	-7%		-17%	-8%	-10%
Black Students						
Share of Student Body		1%		1%	3%	1%
Share of Suspensions		5%		1%	6%	2%
Gap		4%		0%	3%	1%
Filipino Students						
Share of Student Body	1%	31%		6%	2%	23%
Share of Suspensions	0%	10%		2%	0%	9%
Gap	-1%	-21%		-4%	-2%	-14%
Hispanic Students						
Share of Student Body	52%	32%	61%	34%	41%	48%
Share of Suspensions	79%	46%	33%	66%	62%	69%
Gap	27%	14%	-28%	32%	21%	21%
Pacific Islander Students						
Share of Student Body		1%		2%	2%	2%
Share of Suspensions		4%		4%	8%	3%
Gap		3%		2%	6%	1%
White Students						
Share of Student Body	40%	14%	37%	26%	38%	7%
Share of Suspensions	19%	16%	67%	14%	20%	7%
Gap	-21%	2%	30%	-12%	-18%	0%

Notes: the percentage of suspensions and shares of racial groups do not sum to 100% because we exclude students with no reported race, with more than one reported race, where districts did not report racial/ethnic data due to small sample sizes. Gaps of 15 percentage points or more are highlighted.

Source: California Department of Education and Root Policy Research

Staff demographics. Diversity of school staff has been shown to improve outcomes for students of color. For instance, one recent study found that students are less likely to be removed from school as punishment when they and their teachers are the same race. This effect is driven almost entirely by black students, especially black boys, who are markedly less likely to be subjected to exclusionary discipline when taught by black teachers. There is little evidence of any benefit for white students of being matched with white teachers.²⁰ Other research in California has found that, when students have a teacher of their race, they are more likely to attend class, therefore reducing chronic absenteeism.²¹ Even more studies have found that having a teacher of a student's own race substantially improves their math and reading achievement.²²

In San Mateo County, the demographics of faculty and staff are fairly similar to that of its students. Figure V-41 illustrates the share of the county's faculty and staff who are Asian, Black/African American, Hispanic, Filipino, Pacific Islander, and White, and compares those shares to the racial/ethnic breakdown of the county's student body.

There is a slightly larger share of White and Black/African American staff than students, meaning that Black/African American and White student groups are more likely to interact with same-race staff and faculty than other racial groups. Asian students are less likely to interact with a same-race staff 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.

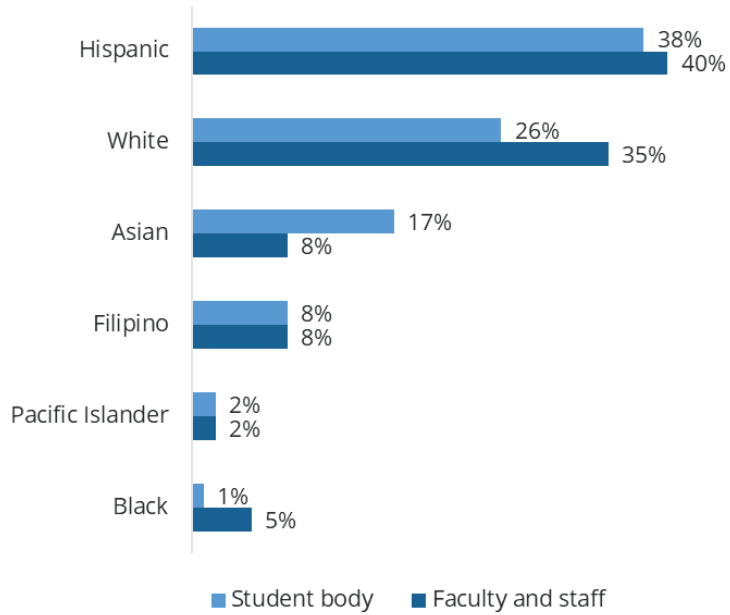
²¹ Gottfried, Michael, J. Jacob Kirksey, and Tina L. Fletcher. "Do High School Students With a Same-Race Teacher Attend Class More Often?." *Educational Evaluation and Policy Analysis* (2021): 01623737211032241.

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**

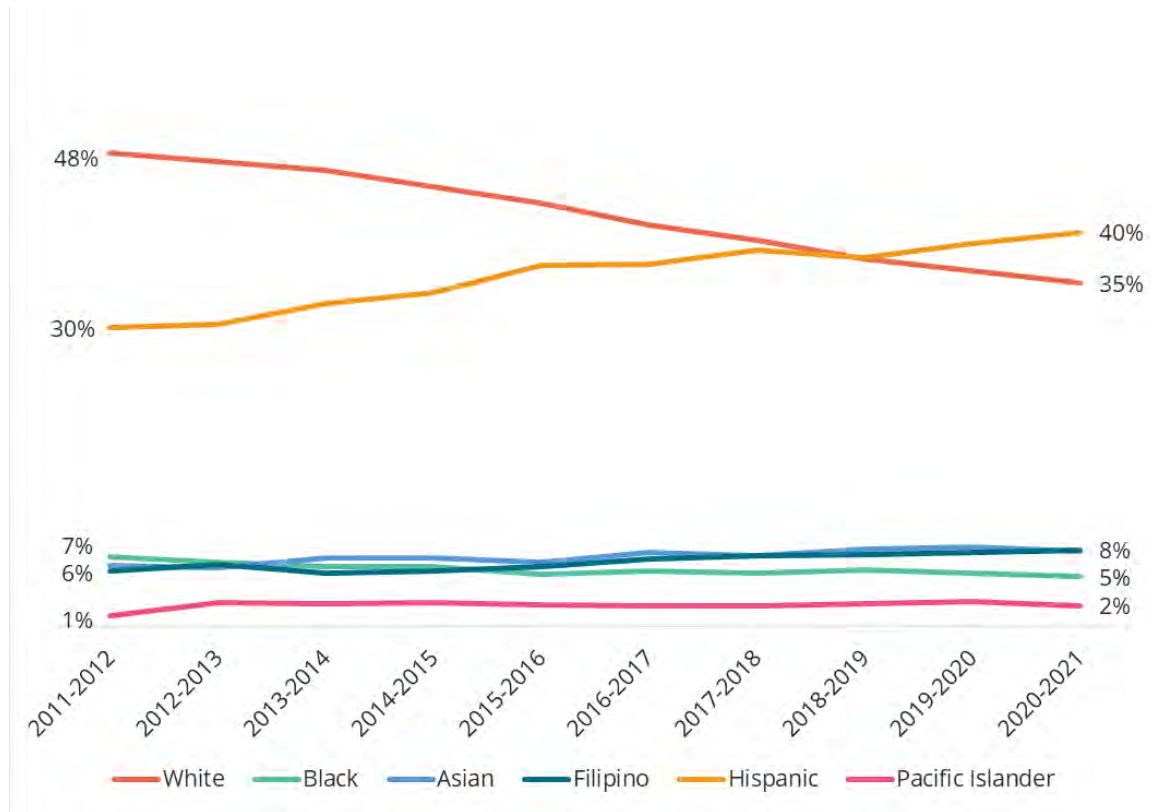
Notes: Percentages do not always sum to 100% because we do not show shares of staff with no reported race, with more than one reported race, or Native American staff.

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 Lomas Elementary	7%	7%	0%	42%	0%	42%
Menlo Park City Elementary	3%	1%	3%	28%	1%	40%
Portola Valley Elementary	4%	4%	0%	33%	0%	59%
Ravenswood City Elementary	2%	12%	1%	72%	5%	3%
Redwood City Elementary	4%	5%	2%	65%	1%	21%
San Carlos Elementary	8%	6%	3%	37%	1%	42%
Woodside Elementary	12%	8%	0%	30%	0%	49%
Total	8%	5%	8%	40%	2%	35%

Notes: Percentages do not always sum to 100% because we do not show shares of staff with no reported race, with more than one reported race, or Native American staff.

Source: California Department of Education and Root Policy Research

Figure V-44 illustrates the gap between faculty/staff representation and the student body. For instance, at San Bruno Park Elementary, 15% of the students are White while 48% of the faculty/staff are White, leaving a 33 percentage point gap.

If schools are striving for a distribution of faculty/staff that reflects the racial and ethnic distribution of their student body, the closer to a 0 percentage point gap, the better. Schools like San Bruno Park Elementary fall short of meeting this goal, in that there is a large overrepresentation of White faculty/staff compared to the student body. Many other districts have a large overrepresentation of White faculty/staff, including Millbrae Elementary (32 percentage point gap), Jefferson Union High School District (29 percentage point gap), and South San Francisco Unified School District (22 percentage points). There are just a few school districts where the share of White students is higher than the share of White faculty, particularly Woodside Elementary and Menlo Park City Elementary, both with a 15 percentage point gap.

Across most school districts, the share of Asian students is larger than the share of Asian faculty/staff. This suggests that Asian students are less likely than their peers to interact with a same-race teacher or staff member. The largest disparity is in Millbrae Elementary, where just 13% of the faculty identify as Asian compared to 46% of the student body, a 33 percentage point gap.

In many school districts, there is a dearth of Hispanic faculty and staff. For instance, in La Honda-Pescadero, 63% of students are Hispanic compared to 39% of faculty, a 24 percentage point gap. In other districts, however, there is a larger share of Hispanic faculty/staff than students. In Las Lomas Elementary, for instance, 13% of students are Hispanic and 42% of faculty/staff are Hispanic. Recall that Las Lomas Elementary commonly has high-performing English language learners students. This may be partly due to the district's large portion of Hispanic faculty/staff.

Though district wide there are approximately the same portions of Filipino students as there are faculty/staff, Jefferson Union High School stands out as a district where Filipino students are less likely to interact with a same-race teacher or staff member. In Jefferson Union, 29% of students are Filipino compared to just 13% of faculty/staff.

In all districts, there are 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 Lomas 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

AFFH Attachment C.4.

BELMONT SEGREGATION REPORT

UC Merced Urban Policy Lab and ABAG/MTC Staff

Version of Record: March 06, 15:54:31



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1 INTRODUCTION

The requirement to Affirmatively Further Fair Housing (AFFH) is derived from The Fair Housing Act of 1968, which prohibited discrimination concerning the sale, rental, and financing of housing based on race, color, religion, national origin, or sex—and was later amended to include familial status and disability.¹ The 2015 U.S. Department of Housing and Urban Development (HUD) Rule to Affirmatively Further Fair Housing and California Assembly Bill 686 (2018) mandate that each jurisdiction takes meaningful action to address significant disparities in housing needs and access to opportunity.²³ AB 686 requires that jurisdictions incorporate AFFH into their Housing Elements, which includes inclusive community participation, an assessment of fair housing, a site inventory reflective of AFFH, and the development of goals, policies, and programs to meaningfully address local fair housing issues. ABAG and UC Merced have prepared this report to assist Bay Area jurisdictions with the Assessment of Fair Housing section of the Housing Element.

Assessment of Fair Housing Components

The Assessment of Fair Housing includes five components, which are discussed in detail on pages 22-43 of [HCD's AFFH Guidance Memo](#):

- A: Summary of fair housing enforcement and outreach capacity
- B: Integration and segregation patterns, and trends related to people with protected characteristics
- C: Racially or ethnically concentrated areas of poverty
- D: Disparities in access to opportunity
- E: Disproportionate housing needs, including displacement risk

1.1 Purpose of this Report

This report describes racial and income segregation in Bay Area jurisdictions. Local jurisdiction staff can use the information in this report to help fulfill a portion of the second component of the Assessment of Fair Housing, which requires analysis of integration and segregation patterns and trends related to people with protected characteristics and lower incomes. Jurisdictions will still need to perform a similar analysis for familial status and populations with disability.

This report provides segregation measures for both the local jurisdiction and the region using several indices. For segregation between neighborhoods within a city (intra-city segregation), this report **includes isolation indices, dissimilarity indices, and Theil's-H index**. The isolation index measures

¹ <https://www.justice.gov/crt/fair-housing-act-2>

² HCD AFFH Guidance Memo

³ The 2015 HUD rule was reversed in 2020 and partially reinstated in 2021.

segregation for a single group, while the dissimilarity index measures segregation between two groups. **The Theil's H-Index** can be used to measure segregation between all racial or income groups across the **city at once**. **HCD's AFFH guidelines require local jurisdictions to include isolation indices and dissimilarity indices in the Housing Element. Theil's H index is provided in addition to these required measures.** For segregation between cities within the Bay Area (inter-city segregation), this report **includes dissimilarity indices at the regional level as required by HCD's AFFH guidelines.** HCD's AFFH guidelines also require jurisdictions to compare conditions at the local level to the rest of the region; and this report presents the difference in the racial and income composition of a jurisdiction relative to the region as a whole to satisfy the comparison requirement.

1.2 Defining Segregation

Segregation is the separation of different demographic groups into different geographic locations or communities, meaning that groups are unevenly distributed across geographic space. This report examines two spatial forms of segregation: neighborhood level segregation *within* a local jurisdiction and city level segregation *between* jurisdictions in the Bay Area.

Neighborhood level segregation (*within* a jurisdiction, or *intra-city*): Segregation of race and income groups can occur from neighborhood to neighborhood *within* a city. For example, if a local jurisdiction has a population that is 20% Latinx, but some neighborhoods are 80% Latinx while others have nearly no Latinx residents, that jurisdiction would have segregated neighborhoods.

City level segregation (*between* jurisdictions in a region, or *inter-city*): Race and income divides also occur *between* jurisdictions in a region. A region could be very diverse with equal numbers of white, Asian, Black, and Latinx residents, but the region could also be highly segregated with each city comprised solely of one racial group.

There are many factors that have contributed to the generation and maintenance of segregation. Historically, racial segregation stemmed from explicit discrimination against people of color, such as restrictive covenants, redlining, and discrimination in mortgage lending. This history includes many overtly discriminatory policies made by federal, state, and local governments (Rothstein 2017). Segregation patterns are also affected by policies that appear race-neutral, such as land use decisions and the regulation of housing development.

Segregation has resulted in vastly unequal access to public goods such as quality schools, neighborhood services and amenities, parks and playgrounds, clean air and water, and public safety (Trounstein 2015). This generational lack of access for many communities, particularly people of color and lower income residents, has often resulted in poor life outcomes, including lower educational attainment, higher morbidity rates, and higher mortality rates (Chetty and Hendren 2018, Ananat 2011, Burch 2014, Cutler and Glaeser 1997, Sampson 2012, Sharkey 2013).

1.3 Segregation Patterns in the Bay Area

Across the San Francisco Bay Area, white residents and above moderate-income residents are significantly more segregated from other racial and income groups (see Appendix 2). The highest levels of racial segregation occur between the Black and white populations. The analysis completed for this report indicates that the amount of racial segregation both *within* Bay Area cities and *across* jurisdictions in the region has decreased since the year 2000. This finding is consistent with recent research from the **Othering and Belonging Institute at UC Berkeley, which concluded that “[a]lthough 7**

of the 9 Bay Area counties were more segregated in 2020 than they were in either 1980 or 1990, racial residential segregation in the region appears to have peaked around the year 2000 and has generally **declined since.**⁴ However, compared to cities in other parts of California, Bay Area jurisdictions have more neighborhood level segregation between residents from different racial groups. Additionally, there is also more racial segregation *between* Bay Area cities compared to other regions in the state.

1.4 Segregation and Land Use

It is difficult to address segregation patterns without an analysis of both historical and existing land use policies that impact segregation patterns. Land use regulations influence what kind of housing is built in a city or neighborhood (Lens and Monkkonen 2016, Pendall 2000). These land use regulations in turn impact demographics: they can be used to affect the number of houses in a community, the number of people who live in the community, the wealth of the people who live in the community, and where within the community they reside (Trounstine 2018). Given disparities in wealth by race and ethnicity, the ability to afford housing in different neighborhoods, as influenced by land use regulations, is highly differentiated across racial and ethnic groups (Bayer, McMillan, and Reuben 2004).⁵ ABAG/MTC plans to issue a separate report detailing the existing land use policies that influence segregation patterns in the Bay Area.

⁴ For more information, see <https://belonging.berkeley.edu/most-segregated-cities-bay-area-2020>.

⁵ Using a household-weighted median of Bay Area county median household incomes, regional values were \$61,050 for Black residents, \$122,174 for Asian/Pacific Islander residents, \$121,794 for white residents, and \$76,306 for Latinx residents. For the source data, see U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B19013B, Table B19013D, B19013H, and B19013I.

Definition of Terms - Geographies

Neighborhood: In this report, “neighborhoods” are approximated by tracts.⁶ Tracts are statistical geographic units defined by the U.S. Census Bureau for the purposes of disseminating data. In the Bay Area, tracts contain on average 4,500 residents. Nearly all Bay Area jurisdictions contain at least two census tracts, with larger jurisdictions containing dozens of tracts.

Jurisdiction: Jurisdiction is used to refer to the 109 cities, towns, and unincorporated county areas that are members of ABAG. Though not all ABAG jurisdictions are cities, this report also uses the term “city” interchangeably with “jurisdiction” in some places.

Region: The region is the nine-county San Francisco Bay Area, which is comprised of Alameda County, Contra Costa County, Marin County, Napa County, San Francisco County, San Mateo County, Santa Clara County, Solano County, and Sonoma County.

⁶ Throughout this report, neighborhood level segregation measures are calculated using census tract data. However, the racial dot maps in Figure 1 and Figure 5 use data from census blocks, while the income group dot maps in Figure 8 and Figure 12 use data from census block groups. These maps use data derived from a smaller geographic scale to better show spatial differences in where different groups live. Census block groups are subdivisions of census tracts, and census blocks are subdivisions of block groups. In the Bay Area, block groups contain on average 1,500 people, while census blocks contain on average 95 people.

2 RACIAL SEGREGATION IN CITY OF BELMONT

Definition of Terms - Racial/Ethnic Groups

The U.S. Census Bureau classifies racial groups (e.g. white or Black/African American) separately from Hispanic/Latino ethnicity.⁷ This report combines U.S. Census Bureau definitions for race and ethnicity into the following racial groups:

White: Non-Hispanic white

Latinx: Hispanic or Latino of any race⁸

Black: Non-Hispanic Black/African American

Asian/Pacific Islander: Non-Hispanic Asian or Non-Hispanic Pacific Islander

People of Color: All who are not non-Hispanic white (including people who identify as “some other race” or “two or more races”)⁹

2.1 Neighborhood Level Racial Segregation (*within* City of Belmont)

Racial dot maps are useful for visualizing how multiple racial groups are distributed within a specific geography. The racial dot map of Belmont in Figure 1 below offers a visual representation of the spatial distribution of racial groups within the jurisdiction. Generally, when the distribution of dots does not suggest patterns or clustering, segregation measures tend to be lower. Conversely, when clusters of certain groups are apparent on a racial dot map, segregation measures may be higher.

⁷ More information about the Census Bureau’s definitions of racial groups is available here:

<https://www.census.gov/topics/population/race/about.html>.

⁸ The term Hispanic has historically been used to describe people from numerous Central American, South American, and Caribbean countries. In recent years, the term Latino or Latinx has become preferred. This report generally uses Latinx to refer to this racial/ethnic group.

⁹ Given the uncertainty in the data for population size estimates for racial and ethnic groups not included in the Latinx, Black, or Asian/Pacific Islander categories, this report only analyzes these racial groups in the aggregate People of Color category.

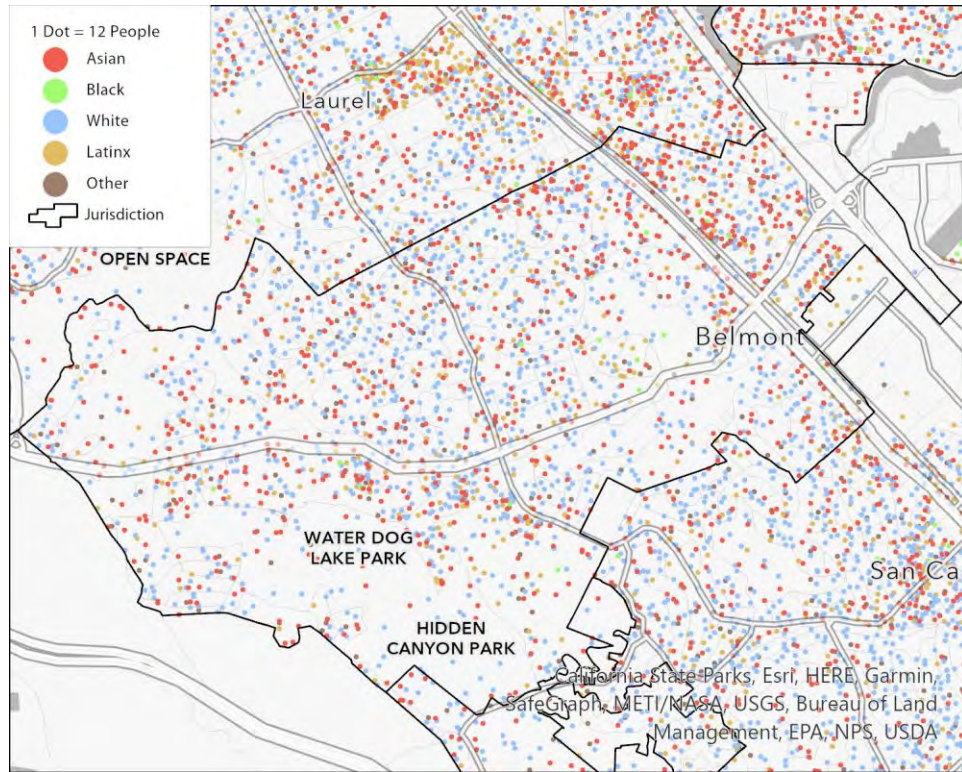


Figure 1: Racial Dot Map of Belmont (2020)

Universe: Population. Source: U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002.

Note: The plot shows the racial distribution at the census block level for City of Belmont and vicinity. Dots in each census block are randomly placed and should not be construed as actual placement of people.

There are many ways to quantitatively measure segregation. Each measure captures a different aspect of the ways in which groups are divided within a community. One way to measure segregation is by using an isolation index:

- **The isolation index compares each neighborhood’s composition to the jurisdiction’s demographics as a whole.**
- This index ranges from 0 to 1. Higher values indicate that a particular group is more isolated from other groups.
- Isolation indices indicate the potential for contact between different groups. The index can be interpreted as the experience of the average member of that group. For example, if the isolation index is .65 for Latinx residents in a city, then the average Latinx resident in that city lives in a neighborhood that is 65% Latinx.

Within City of Belmont the most **isolated racial group is white residents**. Belmont’s isolation index of 0.485 for white residents means that the average white resident lives in a neighborhood that is 48.5% white. Other racial groups are less isolated, meaning they may be more likely to encounter other racial groups in their neighborhoods. The isolation index values for all racial groups in Belmont for the years 2000, 2010, and 2020 can be found in Table 1 below. Among all racial groups in this jurisdiction, the **white population’s isolation index has changed the most over time, becoming less segregated from other racial groups between 2000 and 2020.**

The “Bay Area Average” column in this table provides the average isolation index value across Bay Area jurisdictions for different racial groups in 2020.¹⁰ The data in this column can be used as a comparison to provide context for the levels of segregation experienced by racial groups in this jurisdiction. For example, Table 1 indicates the average isolation index value for white residents across all Bay Area jurisdictions is 0.491, meaning that in the average Bay Area jurisdiction a white resident lives in a neighborhood that is 49.1% white.

Table 1: Racial Isolation Index Values for Segregation within Belmont

Race	Belmont			Bay Area Average
	2000	2010	2020	2020
Asian/Pacific Islander	0.166	0.215	0.302	0.245
Black/African American	0.016	0.018	0.014	0.053
Latinx	0.092	0.124	0.130	0.251
White	0.712	0.624	0.485	0.491

Universe: Population.

Source: IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002. Data from 2010 is from U.S. Census Bureau, Census 2010, Table P4. Data for 2000 is standardized to 2010 census tract geographies and is from U.S. Census Bureau, Census 2000, Table P004.

Figure 2 below shows how racial isolation index values in Belmont compare to values in other Bay Area jurisdictions. In this chart, each dot represents a Bay Area jurisdiction. For each racial group, the spread of dots represents the range of isolation index values among Bay Area jurisdictions. Additionally, the black line within each racial group notes the isolation index value for that group in City of Belmont, and each dashed red line represents the Bay Area average for the isolation index for that group. Local staff can use this chart to contextualize how segregation levels for racial groups in their jurisdiction compare to other jurisdictions in the region.

¹⁰ This average only includes the 104 jurisdictions that have more than one census tract, which is true for all comparisons of Bay Area jurisdictions’ segregation measures in this report. The segregation measures in this report are calculated by comparing the demographics of a jurisdiction’s census tracts to the jurisdiction’s demographics, and such calculations cannot be made for the five jurisdictions with only one census tract (Brisbane, Calistoga, Portola Valley, Rio Vista, and Yountville).

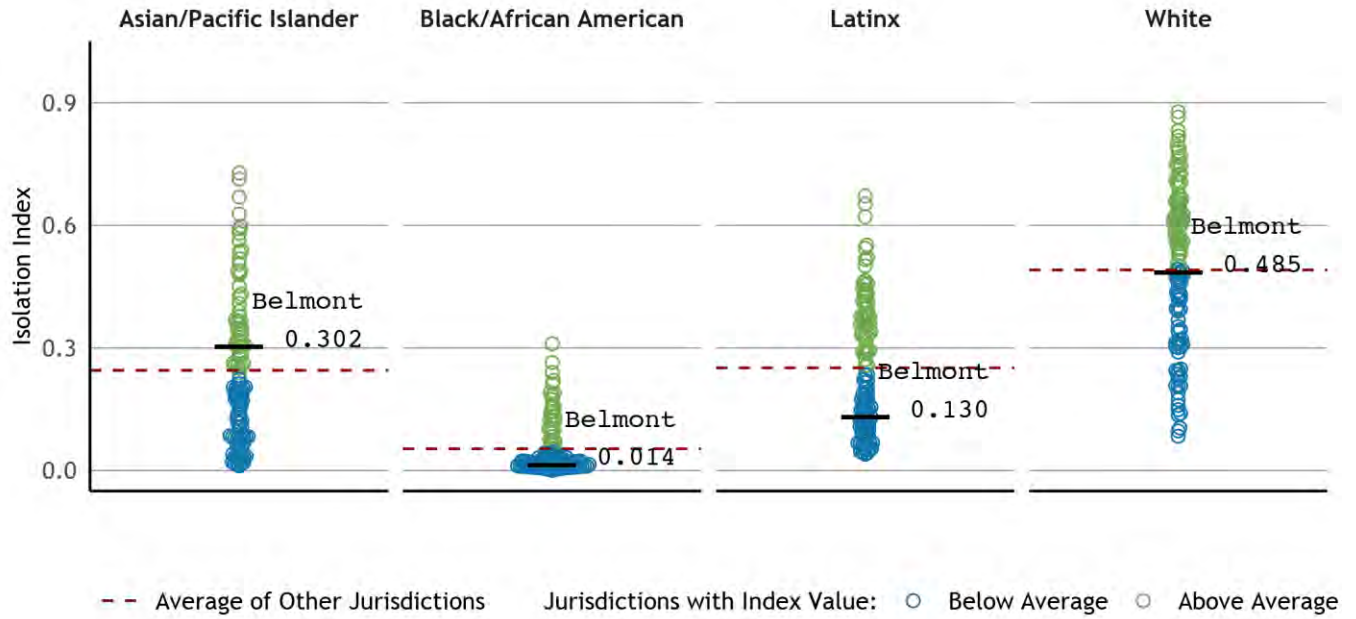


Figure 2: Racial Isolation Index Values for Belmont Compared to Other Bay Area Jurisdictions (2020)

Universe: Bay Area Jurisdictions.

Source: IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002.

Another way to measure segregation is by using a dissimilarity index:

- This index measures how evenly any two groups are distributed across neighborhoods relative to their representation in a city overall. The dissimilarity index at the jurisdiction level can be interpreted as the share of one group that would have to move neighborhoods to create perfect integration for these two groups.
- The dissimilarity index ranges from 0 to 1. Higher values indicate that groups are more unevenly distributed (e.g. they tend to live in different neighborhoods).

Dissimilarity Index Guidance for Cities with Small Racial Group Populations

The analysis conducted for this report suggests that dissimilarity index values are unreliable for a population group if that group represents approximately less than 5% of the jurisdiction's total population.

HCD's AFFH guidance requires the Housing Element to include the dissimilarity index values for racial groups, but also offers flexibility in emphasizing the importance of various measures. ABAG/MTC recommends that when cities have population groups that are less than 5% of the jurisdiction's population (see Table 4), jurisdiction staff use the isolation index or Thiel's H-Index to gain a more accurate understanding of their jurisdiction's neighborhood-level segregation patterns (intra-city segregation).

If a jurisdiction has a very small population of a racial group, this indicates that segregation between the jurisdiction and the region (inter-city segregation) is likely to be an important feature of the jurisdiction's segregation patterns.

In City of Belmont, the Black/African American group is 1.2 percent of the population - so staff should be aware of this small population size when evaluating dissimilarity index values involving this group.

Table 2 below provides the dissimilarity index values indicating the level of segregation in Belmont between white residents and residents who are Black, Latinx, or Asian/Pacific Islander. The table also provides the dissimilarity index between white residents and all residents of color in the jurisdiction, and all dissimilarity index values are shown across three time periods (2000, 2010, and 2020).

In Belmont the highest segregation is between Black and white residents (see Table 2). **Belmont's Black /white** dissimilarity index of 0.165 means that 16.5% of Black (or white) residents would need to move to a different neighborhood to create perfect integration between Black residents and white residents. However, local jurisdiction staff should note that this dissimilarity index value is not a reliable data point due to small population size. See callout box above for more information.

The **"Bay Area Average"** column in this table provides the average dissimilarity index values for these racial group pairings across Bay Area jurisdictions in 2020. The data in this column can be used as a comparison to provide context for the levels of segregation between communities of color are from white residents in this jurisdiction.

For example, Table 2 indicates that the average Latinx/white dissimilarity index for a Bay Area jurisdiction is 0.207, so on average 20.7% of Latinx (or white residents) in a Bay Area jurisdiction would need to move to a different neighborhood within the jurisdiction to create perfect integration between Latinx and white residents in that jurisdiction.

Table 2: Racial Dissimilarity Index Values for Segregation within Belmont

Race	Belmont			Bay Area Average
	2000	2010	2020	2020
Asian/Pacific Islander vs. White	0.161	0.156	0.088	0.185
Black/African American vs. White	0.151*	0.175*	0.165*	0.244
Latinx vs. White	0.151	0.142	0.119	0.207
People of Color vs. White	0.141	0.139	0.087	0.168

Universe: Population.

Source: IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002. Data from 2010 is from U.S. Census Bureau, Census 2010, Table P4. Data for 2000 is standardized to 2010 census tract geographies and is from U.S. Census Bureau, Census 2000, Table P004.

Note: If a number is marked with an asterisk (*), it indicates that the index is based on a racial group making up less than 5 percent of the jurisdiction population, leading to unreliable numbers.

Figure 3 below shows how dissimilarity index values in City of Belmont compare to values in other Bay Area jurisdictions. In this chart, each dot represents a Bay Area jurisdiction. For each racial group pairing, the spread of dots represents the range of dissimilarity index values among Bay Area jurisdictions. Additionally, the black line within each racial group pairing notes the dissimilarity index value in Belmont, and each dashed red line represents the Bay Area average for the dissimilarity index for that pairing. Similar to Figure 2, local staff can use this chart to contextualize how segregation levels between white residents and communities of color in their jurisdiction compare to the rest of the region. However, staff should be mindful of whether a racial group in their jurisdiction has a small population (approximately less than 5% of the jurisdiction’s population), as the dissimilarity index value is less reliable for small populations.

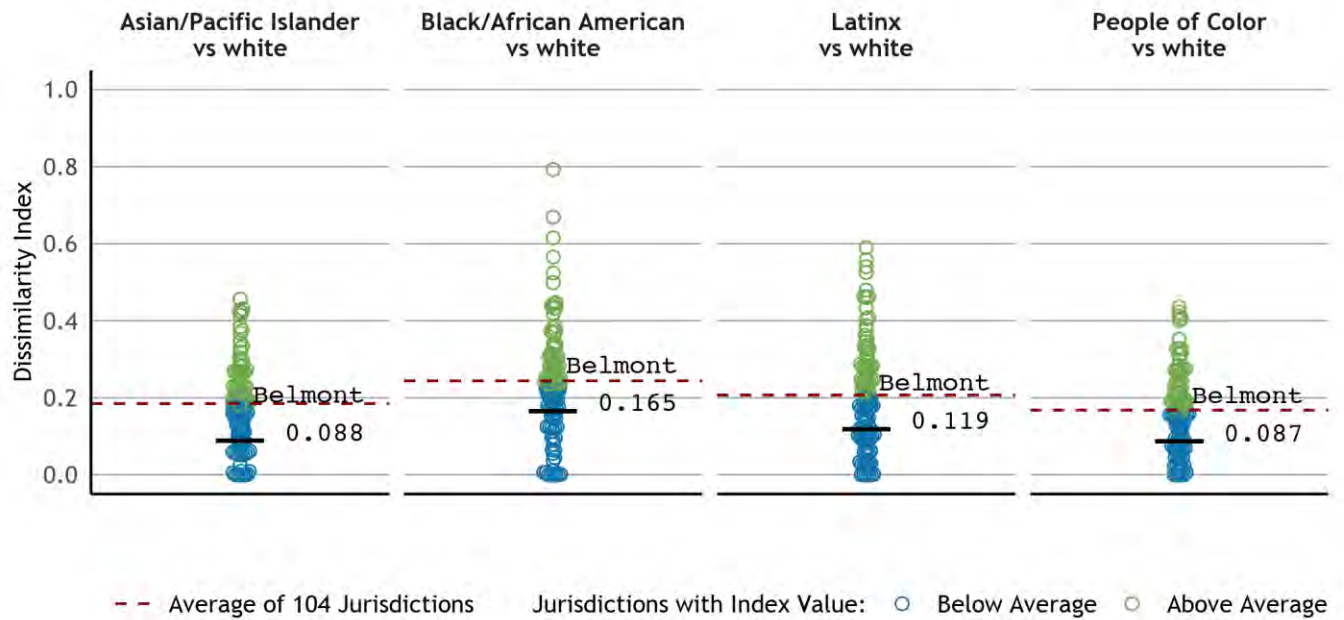


Figure 3: Racial Dissimilarity Index Values for Belmont Compared to Other Bay Area Jurisdictions (2020)

Universe: Bay Area Jurisdictions.

Source: IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002.

Note: The analysis conducted for this report suggests that dissimilarity index values are unreliable for a population group if that group represents approximately less than 5% of the jurisdiction’s total population. ABAG/MTC recommends that when cities have population groups that are less than 5% of the jurisdiction’s population (see Table 4), jurisdiction staff could focus on the isolation index or Thiel’s H-Index to gain a more accurate understanding of neighborhood-level racial segregation in their jurisdiction.

The **Theil’s H Index** can be used to measure segregation between all groups within a jurisdiction:

- This index measures how diverse each neighborhood is compared to the diversity of the whole city. Neighborhoods are weighted by their size, so that larger neighborhoods play a more significant role in determining the total measure of segregation.
- **The index ranges from 0 to 1. A Theil’s H Index value of 0 would mean all** neighborhoods within a city have the same demographics as the whole city. A value of 1 would mean each group lives exclusively in their own, separate neighborhood.
- For jurisdictions with a high degree of diversity (multiple racial groups comprise more than 10% of the population), **Theil’s H offers the clearest summary of overall segregation.**

The **Theil’s H Index** values for neighborhood racial segregation in Belmont for the years 2000, 2010, and 2020 can be found in Table 3 below. The “Bay Area Average” column in the table provides the average **Theil’s H Index** across Bay Area jurisdictions in 2020. Between 2010 and 2020, the **Theil’s H Index** for racial segregation in Belmont declined, suggesting that there is now less neighborhood level racial segregation within the jurisdiction. In 2020, the **Theil’s H Index** for racial segregation in Belmont was

lower than the average value for Bay Area jurisdictions, indicating that neighborhood level racial segregation in Belmont is less than in the average Bay Area city.

Table 3: Theil’s H Index Values for Racial Segregation within Belmont

Index	Belmont			Bay Area Average
	2000	2010	2020	2020
Theil's H Multi-racial	0.014	0.015	0.007	0.042

Universe: Population.
Source: IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002. Data from 2010 is from U.S. Census Bureau, Census 2010, Table P4. Data for 2000 is standardized to 2010 census tract geographies and is from U.S. Census Bureau, Census 2000, Table P004.

Figure 4 below shows how Theil’s H index values for racial segregation in Belmont compare to values in other Bay Area jurisdictions in 2020. In this chart, each dot represents a Bay Area jurisdiction. Additionally, the black line notes the Theil’s H index value for neighborhood racial segregation in Belmont, and the dashed red line represents the average Theil’s H index value across Bay Area jurisdictions. Local staff can use this chart to compare how neighborhood racial segregation levels in their jurisdiction compare to other jurisdictions in the region.

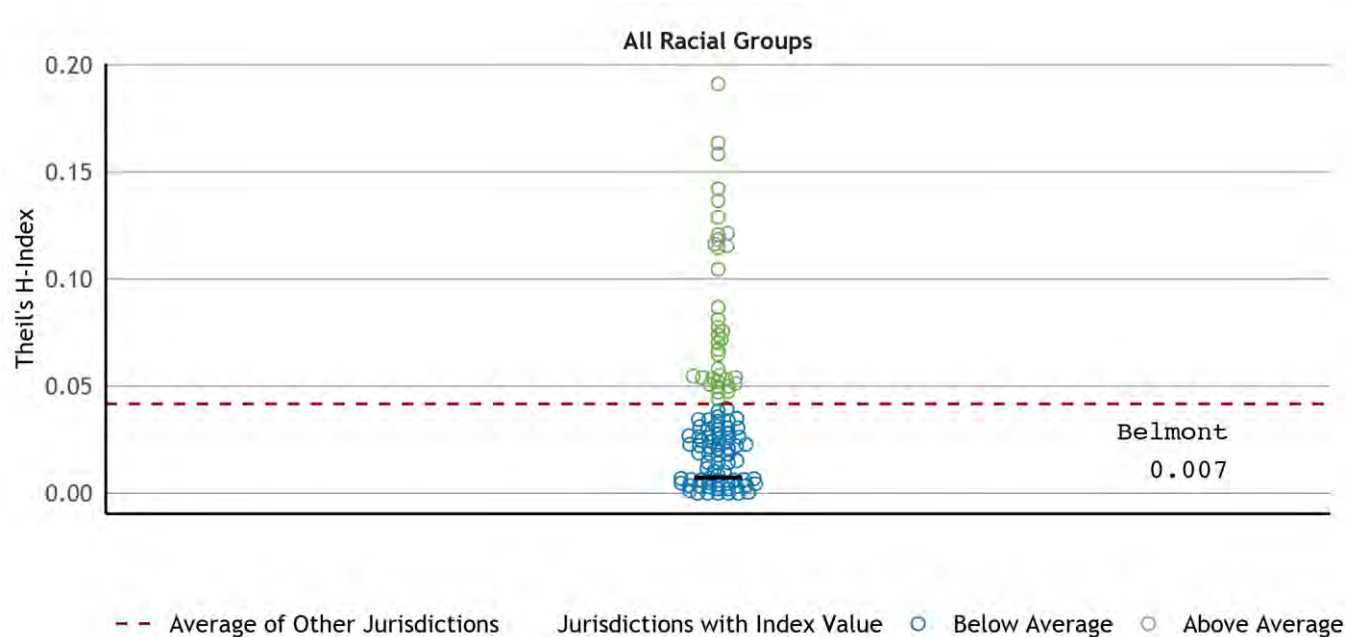


Figure 4: Theil’s H Index Values for Racial Segregation in Belmont Compared to Other Bay Area Jurisdictions (2020)

Universe: Bay Area Jurisdictions.
Source: IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002.

2.2 Regional Racial Segregation (*between Belmont and other jurisdictions*)

At the regional level, segregation is measured between *cities* instead of between *neighborhoods*. Racial dot maps are not only useful for examining neighborhood racial segregation within a jurisdiction, but these maps can also be used to explore the racial demographic differences between different jurisdictions in the region. Figure 5 below presents a racial dot map showing the spatial distribution of racial groups in Belmont as well as in nearby Bay Area cities.

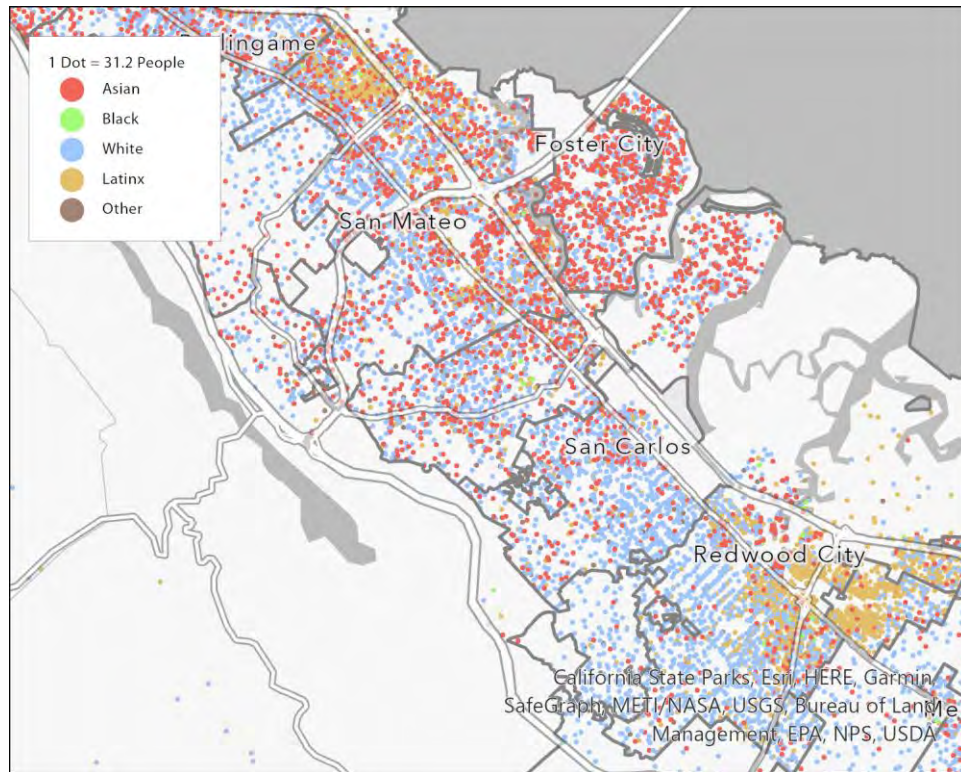


Figure 5: Racial Dot Map of Belmont and Surrounding Areas (2020)

Universe: Population.

Source: U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002.

Note: The plot shows the racial distribution at the census block level for City of Belmont and vicinity. Dots in each census block are randomly placed and should not be construed as actual placement of people.

To understand how each city contributes to the total segregation of the Bay Area, one can look at the difference in the racial composition of a jurisdiction compared to the racial composition of the region as a whole. The racial demographics in Belmont for the years 2000, 2010, and 2020 can be found in Table 4 below. The table also provides the racial composition of the nine-county Bay Area. As of 2020, Belmont has a higher share of white residents than the Bay Area as a whole, a lower share of Latinx residents, a lower share of Black residents, and a higher share of Asian/Pacific Islander residents.

Table 4: Population by Racial Group, Belmont and the Region

Race	Belmont			Bay Area
	2000	2010	2020	2020
Asian/Pacific Islander	15.3%	20.4%	29.9%	28.2%
Black/African American	1.5%	1.6%	1.2%	5.6%
Latinx	8.3%	11.5%	12.4%	24.4%
Other or Multiple Races	4.4%	5.2%	8.6%	5.9%
White	70.4%	61.3%	47.9%	35.8%

Universe: Population.

Source: IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002. Data from 2010 is from U.S. Census Bureau, Census 2010, Table P4. Data for 2000 is standardized to 2010 census tract geographies and is from U.S. Census Bureau, Census 2000, Table P004.

Figure 6 below compares the racial demographics in Belmont to those of all 109 Bay Area jurisdictions.¹¹ In this chart, each dot represents a Bay Area jurisdiction. For each racial group, the **spread of dots represents the range of that group’s representation among Bay Area jurisdictions.** Additionally, the black line within each racial group notes the percentage of the population of City of Belmont represented by that group and how that percentage ranks among all 109 jurisdictions. Local staff can use this chart to compare the representation of different racial groups in their jurisdiction to **those groups’ representation in other jurisdictions in the region, which can indicate the extent of segregation between this jurisdiction and the region.**

¹¹ While comparisons of segregation measures are made only using the 104 jurisdictions with more than one census tract, this comparison of jurisdiction level demographic data can be made using all 109 jurisdictions.

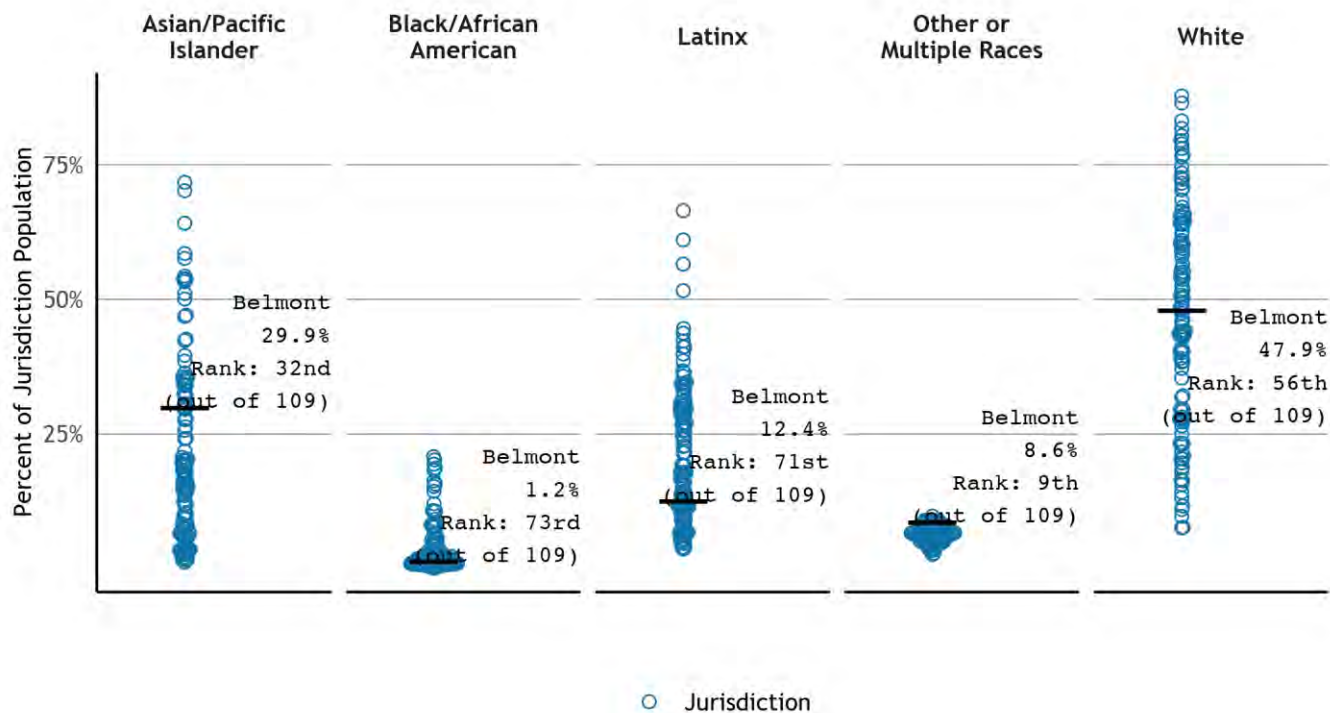


Figure 6: Racial Demographics of Belmont Compared to All Bay Area Jurisdictions (2020)

Universe: Bay Area Jurisdictions.
Source U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002.

The map in Figure 7 below also illustrates regional racial segregation between Belmont and other jurisdictions. This map demonstrates how the percentage of people of color in Belmont and surrounding jurisdictions compares to the Bay Area as a whole:

- Jurisdictions shaded orange have a share of people of color that is less than the Bay Area as a whole, and the degree of difference is greater than five percentage points.
- Jurisdictions shaded white have a share of people of color comparable to the regional percentage of people of color (within five percentage points).
- Jurisdictions shaded grey have a share of people of color that is more than five percentage points greater than the regional percentage of people of color.

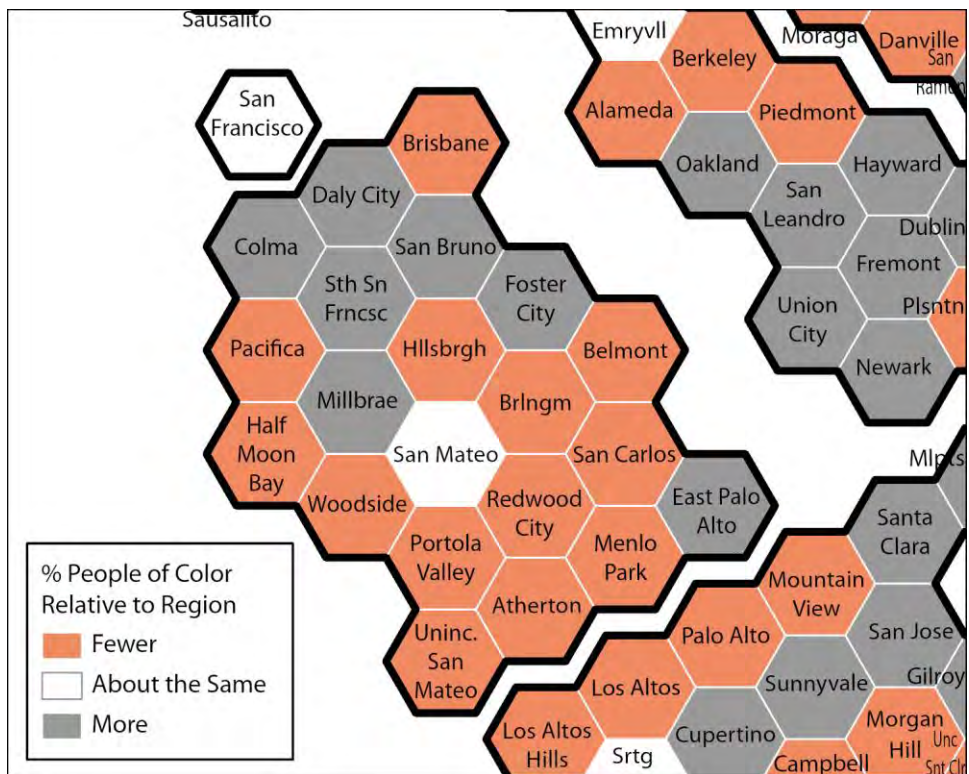


Figure 7: Comparing the Share of People of Color in Belmont and Vicinity to the Bay Area (2020)

Universe: Population.

Source: U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002.

Note: People of color refer to persons not identifying as non-Hispanic white. The nine-county Bay Area is the reference region for this map.

Segregation between jurisdictions in the region can also be analyzed by calculating regional values for the segregation indices discussed previously. Table 5 presents dissimilarity index, isolation index, and **Theil’s H index values for racial segregation for the entire nine-county Bay Area** in 2010 and 2020. In the previous section of this report focused on neighborhood level racial segregation, these indices were calculated by comparing the racial demographics of the census tracts within a jurisdiction to the demographics of the jurisdiction as a whole. In Table 5, these measures are calculated by comparing **the racial demographics of local jurisdictions to the region’s racial makeup**. For example, looking at the 2020 data, Table 5 shows the white isolation index value for the region is 0.429, meaning that on average white Bay Area residents live in a jurisdiction that is 42.9% white in 2020. An example of regional dissimilarity index values in Table 5 is the Black/white dissimilarity index value of 0.459, which means that across the region 45.9% of Black (or white) residents would need to move to a different jurisdiction to evenly distribute Black and white residents across Bay Area jurisdictions. The dissimilarity index values in Table 5 **reflect recommendations made in HCD’s AFFH guidance for calculating dissimilarity at the region level.**¹² The regional value for the Theil’s H index measures how

¹² For more information on HCD’s recommendations regarding data considerations for analyzing integration and segregation patterns, see page 31 of the AFFH Guidance Memo.

diverse each Bay Area jurisdiction is compared to **the racial diversity of the whole region**. A Theil’s H Index value of 0 would mean all *jurisdictions* within the Bay Area have the same racial demographics as the entire region, while a value of 1 would mean each racial group lives exclusively in their own **separate jurisdiction**. The regional Theil’s H index value for racial segregation decreased slightly between 2010 and 2020, meaning that racial groups in the Bay Area are now slightly less separated by the borders between jurisdictions.

Table 5: Regional Racial Segregation Measures

Index	Group	2010	2020
Isolation Index Regional Level	Asian/Pacific Islander	0.317	0.378
	Black/African American	0.144	0.118
	Latinx	0.283	0.291
	White	0.496	0.429
	People of Color	0.629	0.682
Dissimilarity Index Regional Level	Asian/Pacific Islander vs. White	0.384	0.369
	Black/African American vs. White	0.475	0.459
	Latinx vs. White	0.301	0.297
	People of Color vs. White	0.296	0.293
Theil's H Multi-racial	All Racial Groups	0.103	0.097

Universe: Population.

Source: IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002. Data from 2010 is from U.S. Census Bureau, 2010 Census of Population and Housing, Table P4.

3 INCOME SEGREGATION IN CITY OF BELMONT

Definition of Terms - Income Groups

When analyzing segregation by income, this report uses income group designations consistent with the Regional Housing Needs Allocation and the Housing Element:

Very low-income: individuals earning less than 50% of Area Median Income (AMI)

Low-income: individuals earning 50%-80% of AMI

Moderate-income: individuals earning 80%-120% of AMI

Above moderate-income: individuals earning 120% or more of AMI

Additionally, this report uses the term “lower-income” to refer to all people who earn less than 80% of AMI, which includes both low-income and very low-income individuals.

The income groups described above are based on U.S. Department of Housing and Urban Development (HUD) calculations for AMI. HUD calculates the AMI for different metropolitan areas, and the nine county Bay Area includes the following metropolitan areas: Napa Metro Area (Napa County), Oakland-Fremont Metro Area (Alameda and Contra Costa Counties), San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties), San Jose-Sunnyvale-Santa Clara Metro Area (Santa Clara County), Santa Rosa Metro Area (Sonoma County), and Vallejo-Fairfield Metro Area (Solano County).

The income categories used in this report are based on the AMI for the HUD metro area where this jurisdiction is located.

3.1 Neighborhood Level Income Segregation (*within* Belmont)

Income segregation can be measured using similar indices as racial segregation. Income dot maps, similar to the racial dot maps shown in Figures 1 and 5, are useful for visualizing segregation between multiple income groups at the same time. The income dot map of Belmont in Figure 8 below offers a visual representation of the spatial distribution of income groups within the jurisdiction. As with the racial dot maps, when the dots show lack of a pattern or clustering, income segregation measures tend to be lower, and conversely, when clusters are apparent, the segregation measures may be higher as well.

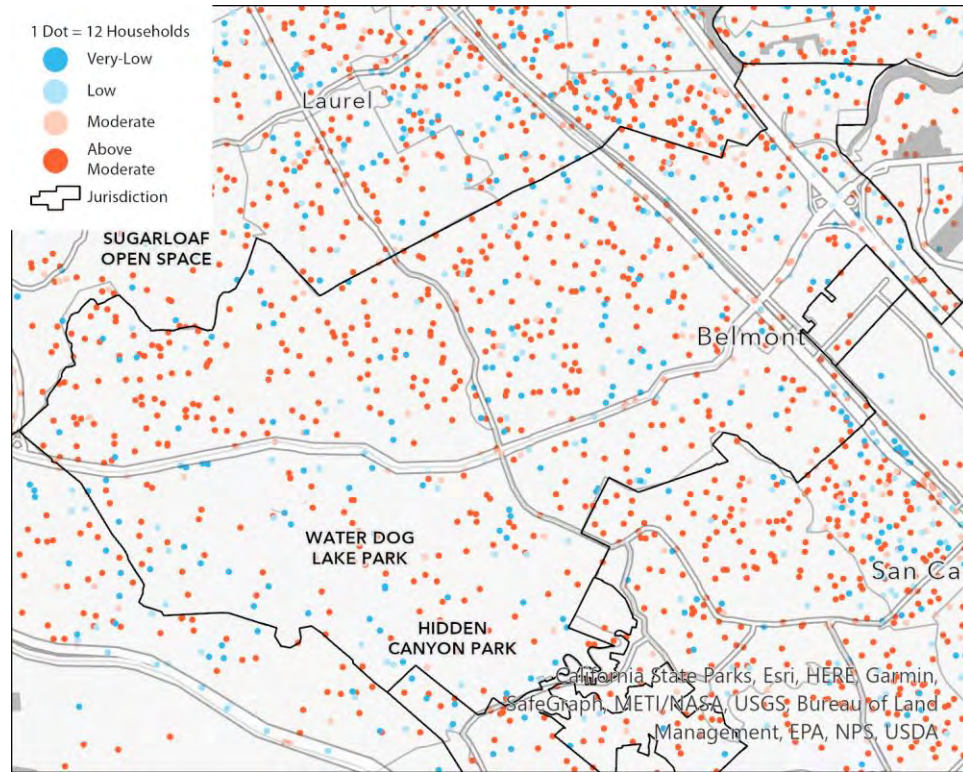


Figure 8: Income Dot Map of Belmont (2015)

Universe: Population.

Source: U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data.

Note: The plot shows the income group distribution at the census block group level for City of Belmont and vicinity. Dots in each block group are randomly placed and should not be construed as actual placement of individuals.

The isolation index values for all income groups in Belmont for the years 2010 and 2015 can be found in Table 6 below.¹³ Above Moderate-income residents are the most isolated income group in Belmont. **Belmont’s isolation index of 0.527 for these residents means that the average Above Moderate-income resident in Belmont lives in a neighborhood that is 52.7% Above Moderate-income.** Among all income groups, the Very Low-income population’s isolation index has changed the most over time, becoming more segregated from other income groups between 2010 and 2015.

Similar to the tables presented earlier for neighborhood racial segregation, the “Bay Area Average” column in Table 6 provides the average isolation index value across Bay Area jurisdictions for different income groups in 2015. The data in this column can be used as a comparison to provide context for the levels of segregation experienced by income groups in this jurisdiction. For example, Table 6 indicates the average isolation index value for very low-income residents across Bay Area jurisdictions is 0.269,

¹³ This report presents data for income segregation for the years 2010 and 2015, which is different than the time periods used for racial segregation. This deviation stems from the [data source recommended for income segregation calculations](#) in HCD’s AFFH Guidelines. This data source most recently updated with data from the 2011-2015 American Community Survey 5-year estimates. For more information on HCD’s recommendations for calculating income segregation, see [page 32 of HCD’s AFFH Guidelines](#).

meaning that in the average Bay Area jurisdiction a very low-income resident lives in a neighborhood that is 26.9% very low-income.

Table 6: Income Group Isolation Index Values for Segregation within Belmont

Income Group	Belmont		Bay Area Average
	2010	2015	2015
Very Low-Income (<50% AMI)	0.173	0.243	0.269
Low-Income (50%-80% AMI)	0.146	0.125	0.145
Moderate-Income (80%-120% AMI)	0.213	0.182	0.183
Above Moderate-Income (>120% AMI)	0.513	0.527	0.507

Universe: Population.

Source: Data for 2015 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data. Data for 2010 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2006-2010 Low- and Moderate-Income Summary Data.

Figure 9 below shows how income group isolation index values in Belmont compare to values in other Bay Area jurisdictions. In this chart, each dot represents a Bay Area jurisdiction. For each income group, the spread of dots represents the range of isolation index values among Bay Area jurisdictions. Additionally, the black line within each income group notes the isolation index value for that group in Belmont, and each dashed red line represents the Bay Area average for the isolation index for that group. Local staff can use this chart to contextualize how segregation levels for income groups in their jurisdiction compare to the rest of the region.

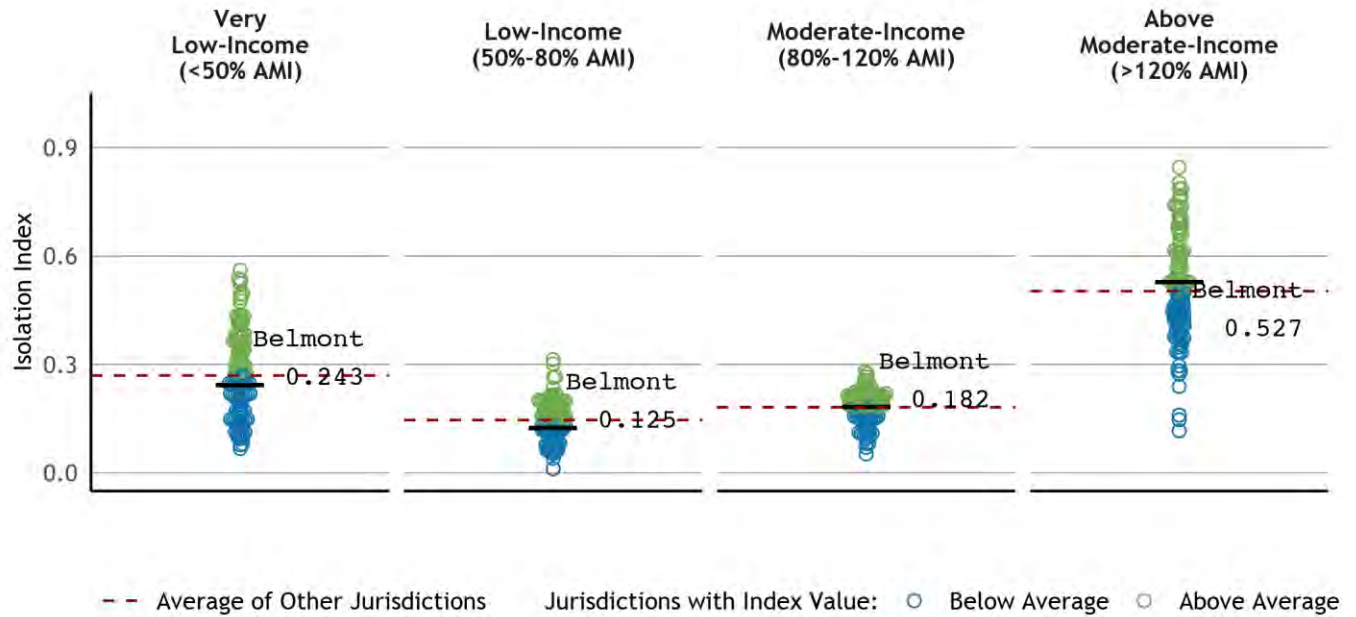


Figure 9: Income Group Isolation Index Values for Belmont Compared to Other Bay Area Jurisdictions (2015)

Universe: Bay Area Jurisdictions.

Source: U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data.

Table 7 below provides the dissimilarity index values indicating the level of segregation in Belmont between residents who are lower-income (earning less than 80% of AMI) and those who are not lower-income (earning above 80% of AMI). This data aligns with the requirements described in HCD’s AFFH Guidance Memo for identifying dissimilarity for lower-income households.¹⁴ Segregation in Belmont between lower-income residents and residents who are not lower-income increased between 2010 and 2015. Additionally, Table 7 shows dissimilarity index values for the level of segregation in Albany between residents who are very low-income (earning less than 50% of AMI) and those who are above moderate-income (earning above 120% of AMI). This supplementary data point provides additional nuance to an analysis of income segregation, as this index value indicates the extent to which a jurisdiction’s lowest and highest income residents live in separate neighborhoods.

Similar to other tables in this report, the “Bay Area Average” column shows the average dissimilarity index values for these income group pairings across Bay Area jurisdictions in 2015. For example, Table 7 indicates that the average dissimilarity index between lower-income residents and other residents in a Bay Area jurisdiction is 0.198, so on average 19.8% of lower-income residents in a Bay Area jurisdiction would need to move to a different neighborhood within the jurisdiction to create perfect income group integration in that jurisdiction.

¹⁴ For more information, see page 32 of HCD’s AFFH Guidance Memo.

In 2015, the income segregation in Belmont between lower-income residents and other residents was higher than the average value for Bay Area jurisdictions (See Table 7). This means that the lower-income residents are more segregated from other residents within Belmont compared to other Jurisdictions in the region.

Table 7: Income Group Dissimilarity Index Values for Segregation within Belmont

Income Group	Belmont		Bay Area Average
	2010	2015	2015
Below 80% AMI vs. Above 80% AMI	0.188	0.244	0.198
Below 50% AMI vs. Above 120% AMI	0.209	0.237	0.253

Universe: Population.

Source: Data for 2015 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data. Data for 2010 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2006-2010 Low- and Moderate-Income Summary Data.

Figure 10 below shows how dissimilarity index values for income segregation in Belmont compare to values in other Bay Area jurisdictions. In this chart, each dot represents a Bay Area jurisdiction. For each income group pairing, the spread of dots represents the range of dissimilarity index values among Bay Area jurisdictions. Additionally, the black line within each income group pairing notes the dissimilarity index value in Belmont, and each dashed red line represents the Bay Area average for the dissimilarity index for that pairing. Local staff can use this chart to contextualize how segregation levels between lower-income residents and wealthier residents in their jurisdiction compared to the rest of the region.

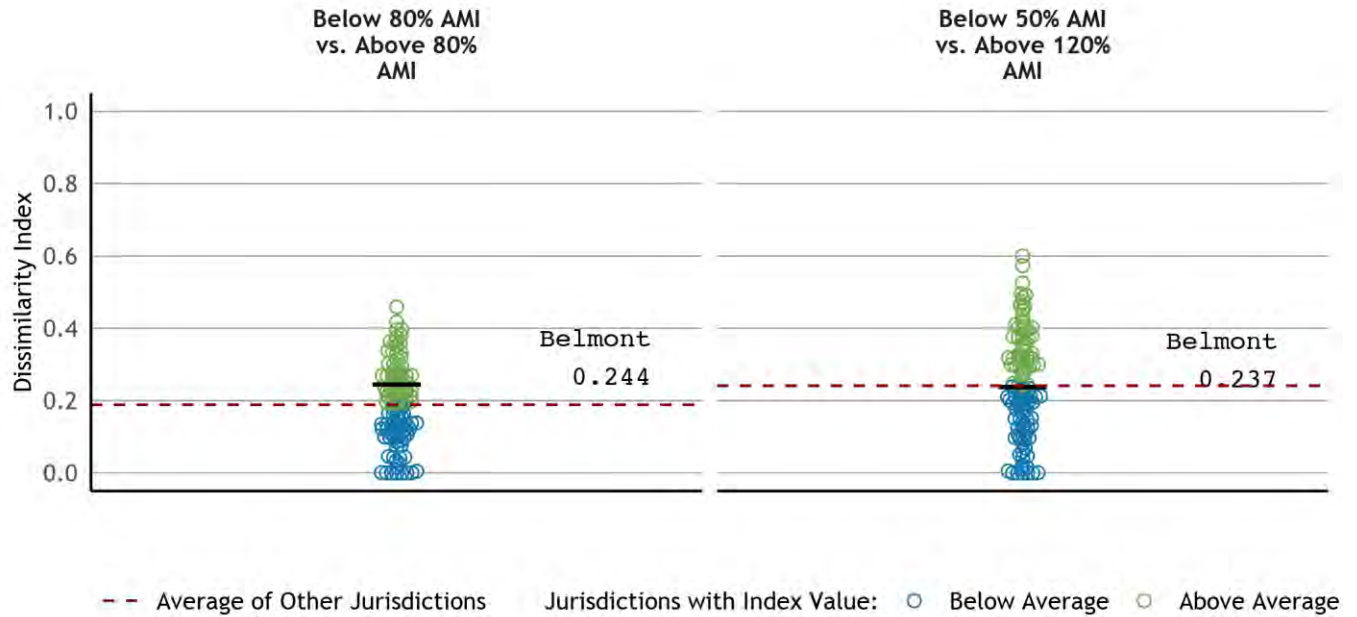


Figure 10: Income Group Dissimilarity Index Values for Belmont Compared to Other Bay Area Jurisdictions (2015)

Universe: Bay Area Jurisdictions.

Source: U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data.

The Theil’s H Index values for neighborhood income group segregation in Belmont for the years 2010 and 2015 can be found in Table 8 below. The “Bay Area Average” column in this table provides the average Theil’s H Index value across Bay Area jurisdictions for different income groups in 2015. By 2015, the Theil’s H Index value for income segregation in Belmont was more than it had been in 2010. In 2015, the Theil’s H Index value for income group segregation in Belmont was lower than the average value for Bay Area jurisdictions, indicating there is less neighborhood level income segregation in Belmont than in the average Bay Area city.

Table 8: Theil’s H Index Values for Income Segregation within Belmont

	Belmont		Bay Area Average
Index	2010	2015	2015
Theil's H Multi-income	0.018	0.033	0.043

Universe: Population.

Source: Data for 2015 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data. Data for 2010 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2006-2010 Low- and Moderate-Income Summary Data.

Figure 11 below shows how Theil’s H index values for income group segregation in Belmont compare to values in other Bay Area jurisdictions in 2015. In this chart, each dot represents a Bay Area jurisdiction. Additionally, the black line notes the Theil’s H index value for income group segregation in Belmont, and the dashed red line represents the average Theil’s H index value across Bay Area jurisdictions. Local staff can use this chart to compare how neighborhood income group segregation levels in their jurisdiction compare to other jurisdictions in the region.



Figure 11: Income Group Theil’s H Index Values for Belmont Compared to Other Bay Area Jurisdictions (2015)

Universe: Bay Area Jurisdictions.

Source: U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data.

3.2 Regional Income Segregation (*between* Belmont and other jurisdictions)

At the regional level, segregation is measured between jurisdictions instead of between neighborhoods. Income dot maps are not only useful for examining neighborhood income segregation within a jurisdiction, but these maps can also be used to explore income demographic differences between jurisdictions in the region. Figure 12 below presents an income dot map showing the spatial distribution of income groups in Belmont as well as in nearby Bay Area jurisdictions.

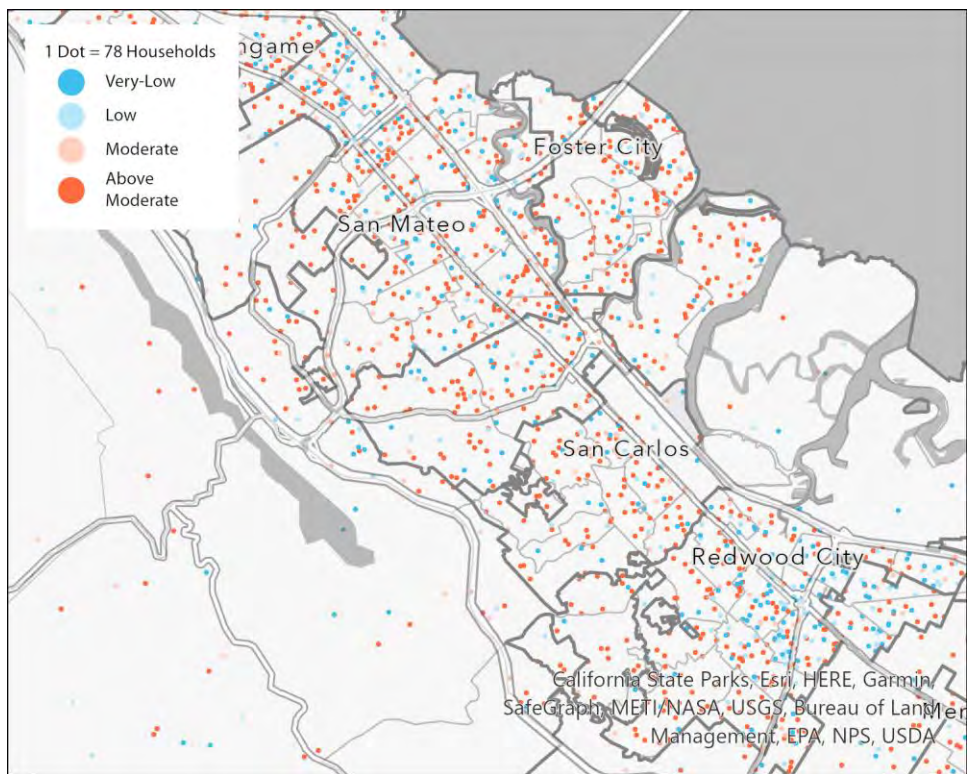


Figure 12: Income Dot Map of Belmont and Surrounding Areas (2015)

Universe: Population.

Source: U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data.

Note: The plot shows the income group distribution at the census block group level for City of Belmont and vicinity. Dots in each block group are randomly placed and should not be construed as actual placement of individuals.

When looking at income segregation between jurisdictions in the Bay Area, one can examine how Belmont differs from the region. The income demographics in Belmont for the years 2010 and 2015 can be found in Table 9 below. The table also provides the income composition of the nine-county Bay Area in 2015. As of that year, Belmont had a lower share of very low-income residents than the Bay Area as a whole, a lower share of low-income residents, a similar share of moderate-income residents, and a higher share of above moderate-income residents.

Table 9: Population by Income Group, Belmont and the Region

Income Group	Belmont		Bay Area
	2010	2015	2015
Very Low-Income (<50% AMI)	15.7%	21.99%	28.7%
Low-Income (50%-80% AMI)	13.56%	10.7%	14.3%
Moderate-Income (80%-120% AMI)	21.12%	17.12%	17.6%
Above Moderate-Income (>120% AMI)	49.62%	50.19%	39.4%

Universe: Population.

Source: Data for 2015 is from Housing U.S. Department of and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data. Data for 2010 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2006-2010 Low- and Moderate-Income Summary Data.

Figure 13 below compares the income demographics in Belmont to other Bay Area jurisdictions.¹⁵ Like the chart in Figure 3, each dot represents a Bay Area jurisdiction. For each income group, the spread of dots represents the range of that group’s representation among Bay Area jurisdictions. The smallest range is among jurisdictions’ moderate-income populations, while Bay Area jurisdictions vary the most in the share of their population that is above moderate-income. Additionally, the black lines within each income group note the percentage of Belmont population represented by that group and how that percentage ranks among other jurisdictions. Local staff can use this chart to compare the representation of different income groups in their jurisdiction to those groups’ representation in other jurisdictions in the region, which can indicate the extent of segregation between this jurisdiction and the region.

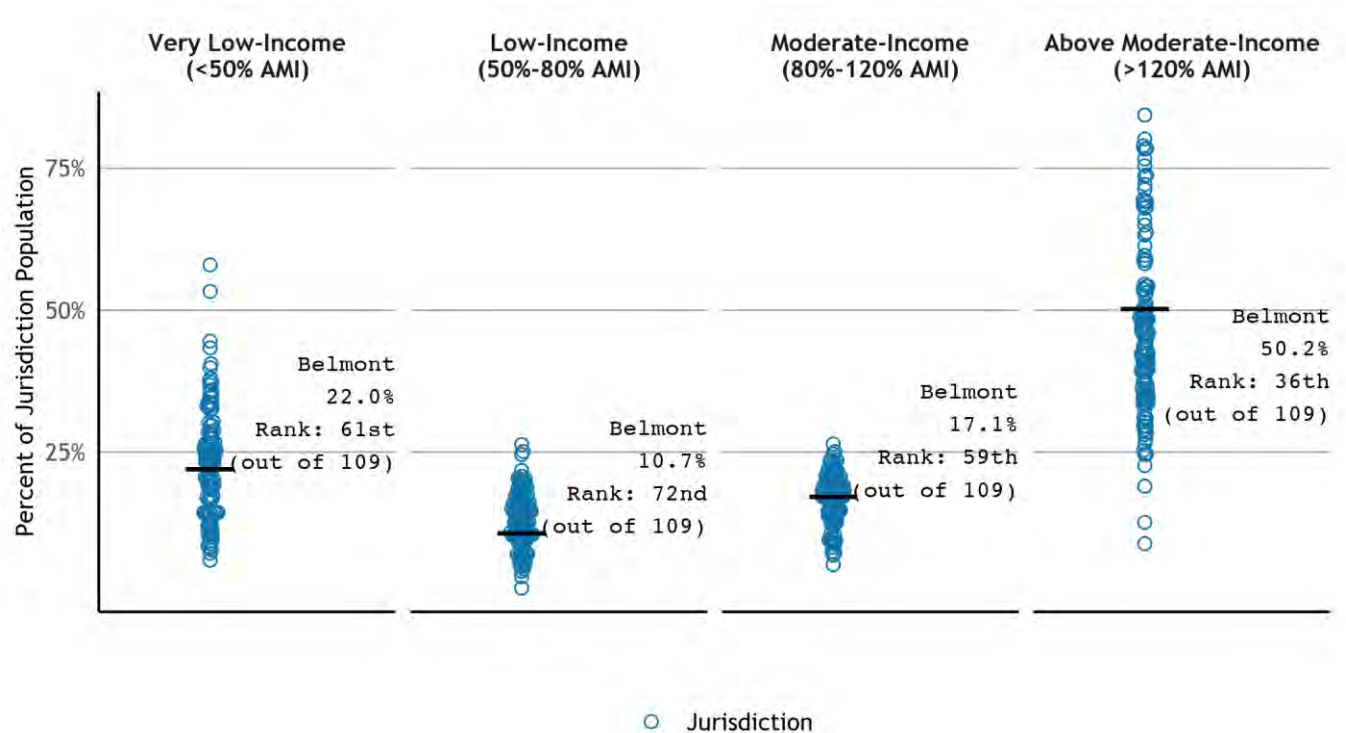


Figure 13: Income Demographics of Belmont Compared to Other Bay Area Jurisdictions (2015)

Universe: Bay Area Jurisdictions.

Source: U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data.

¹⁵ While comparisons of segregation measures are made only using the 104 jurisdictions with more than one census tract, this comparison of jurisdiction level demographic data can be made using all 109 jurisdictions.

Income segregation between jurisdictions in the region can also be analyzed by calculating regional values for the segregation indices discussed previously. Similar to the regional racial segregation measures shown in Table 5, Table 10 **presents dissimilarity index, isolation index, and Theil’s H index** values for income segregation for the entire nine-county Bay Area in 2010 and 2015. In the previous section of this report focused on neighborhood level income segregation, segregation indices were calculated by comparing the income demographics of the census tracts within a jurisdiction to the demographics of the jurisdiction as a whole. In Table 10, these measures are calculated by comparing **the income demographics of local jurisdictions to the region’s income group makeup. For example,** looking at 2015 data, Table 10 shows the regional isolation index value for very low-income residents is 0.315 for 2015, meaning that on average very low-income Bay Area residents live in a jurisdiction that is 31.5% very low-income. The regional dissimilarity index for lower-income residents and other residents is 0.194 in 2015, which means that across the region 19.4% of lower-income residents would need to move to a different jurisdiction to create perfect income group integration in the Bay Area as a **whole. The regional value for the Theil’s H index measures how diverse each Bay Area jurisdiction is compared to the income group diversity of the whole region. A Theil’s H Index value of 0 would mean** all jurisdictions within the Bay Area have the same income demographics as the entire region, while a value of 1 would mean each income group lives exclusively in their own separate jurisdiction. The **regional Theil’s H index value for income segregation decreased slightly between 2010 and 2015,** meaning that income groups in the Bay Area are now slightly less separated by the borders between jurisdictions.

Table 10: Regional Income Segregation Measures

Index	Group	2010	2015
Isolation Index Regional Level	Very Low-Income (<50% AMI)	0.277	0.315
	Low-Income (50%-80% AMI)	0.157	0.154
	Moderate-Income (80%-120% AMI)	0.185	0.180
	Above Moderate-Income (>120% AMI)	0.467	0.435
Dissimilarity Index Regional Level	Below 80% AMI vs. Above 80% AMI	0.186	0.194
	Below 50% AMI vs. Above 120% AMI	0.238	0.248
Theil's H Multi-income	All Income Groups	0.034	0.032

Universe: Population.

Source: Data for 2015 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data. Data for 2010 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2006-2010 Low- and Moderate-Income Summary Data.

4 APPENDIX 1: SUMMARY OF FINDINGS

4.1 Segregation in City of Belmont

- The isolation index measures the segregation of a single group, and the dissimilarity index measures segregation between two **different groups**. **The Theil's H-Index** can be used to measure segregation between all racial or income groups across the city at once.
- As of 2020, white residents are the most segregated compared to other racial groups in Belmont, as measured by the isolation index. White residents live in neighborhoods where they are less likely to come into contact with other racial groups.
- **Among all racial groups, the white population's isolation index value has changed the most over time, becoming less segregated from other racial groups between 2000 and 2020.**
- According to the dissimilarity index, within Belmont the highest level of racial segregation is between Black and white residents.¹⁶ However, local jurisdiction staff should note that this dissimilarity index value is not a reliable data point due to small population size.
- **According to the Theil's H-Index**, neighborhood racial segregation in Belmont declined between 2010 and 2020. Neighborhood income segregation increased between 2010 and 2015.
- Above Moderate-income residents are the most segregated compared to other income groups in Belmont. Above Moderate-income residents live in neighborhoods where they are less likely to encounter residents of other income groups.
- Among all income groups, the Very Low-income population's **segregation measure has changed** the most over time, becoming more segregated from other income groups between 2010 and 2015.
- According to the dissimilarity index, segregation between lower-income residents and residents who are not lower-income has increased between 2010 and 2015. In 2015, the income segregation in Belmont between lower-income residents and other residents was higher than the average value for Bay Area jurisdictions.

4.2 Segregation Between City of Belmont and Other jurisdictions in the Bay Area Region

- Belmont has a higher share of white residents than other jurisdictions in the Bay Area as a whole, a lower share of Latinx residents, a lower share of Black residents, and a higher share of Asian/Pacific Islander residents.

¹⁶ The analysis conducted for this report suggests that dissimilarity index values are unreliable for a population group if that group represents **approximately less than 5% of the jurisdiction's total population**. **ABAG/MTC recommends that when cities have population groups that are less than 5% of the jurisdiction's population (see Table 15 in Appendix 2), jurisdiction staff could focus on the isolation index or Thiel's H-Index to gain a more accurate understanding of neighborhood-level racial segregation in their jurisdiction.**

- Regarding income groups, Belmont has a lower share of very low-income residents than other jurisdictions in the Bay Area as a whole, a lower share of low-income residents, a similar share of moderate-income residents, and a higher share of above moderate-income residents.

5 APPENDIX 2: SEGREGATION DATA

Appendix 2 combines tabular data presented throughout this report into a more condensed format. This data compilation is intended to enable local jurisdiction staff and their consultants to easily reference this data and re-use the data in the Housing Element or other relevant documents/analyses.

Table 11 in this appendix combines data from Table 1, Table 2, and Table 3 in the body of the report. Table 12 in this appendix combines data from Table 6, Table 7, and Table 8 in the body of the report. Table 13 represents a duplication of Table 5 in the body of the report; Table 14 represents a duplication of Table 10 in the body of the report; Table 15 in this appendix represents a duplication of Table 4 in the body of the report, while Table 16 represents a duplication of Table 9 in the body of the report.

Table 11: Neighborhood Racial Segregation Levels in Belmont

Index	Race	Belmont			Bay Area Average
		2000	2010	2020	2020
Isolation	Asian/Pacific Islander	0.166	0.215	0.302	0.245
	Black/African American	0.016	0.018	0.014	0.053
	Latinx	0.092	0.124	0.130	0.251
	White	0.712	0.624	0.485	0.491
Dissimilarity	Asian/Pacific Islander vs. White	0.161	0.156	0.088	0.185
	Black/African American vs. White	0.151*	0.175*	0.165*	0.244
	Latinx vs. White	0.151	0.142	0.119	0.207
	People of Color vs. White	0.141	0.139	0.087	0.168
Theil's H Multi-racial	All	0.014	0.015	0.007	0.042

Universe: Population.

Source: IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002. Data from 2010 is from U.S. Census Bureau, 2010 Census of Population and Housing, Table P4. Data for 2000 is standardized to 2010 census tract geographies and is from U.S. Census Bureau, Census 2000, Table P004.

Note: If a number is marked with an asterisk (*), it indicates that the index is based on a racial group making up less than 5 percent of the jurisdiction population, leading to unreliable numbers.

Table 12: Neighborhood Income Segregation Levels in Belmont

Index	Income Group	Belmont		Bay Area Average
		2010	2015	2015
Isolation	Very Low-Income (<50% AMI)	0.173	0.243	0.269
	Low-Income (50%-80% AMI)	0.146	0.125	0.145
	Moderate-Income (80%-120% AMI)	0.213	0.182	0.183
	Above Moderate-Income (>120% AMI)	0.513	0.527	0.507
Dissimilarity	Below 80% AMI vs. Above 80% AMI	0.188	0.244	0.198
	Below 50% AMI vs. Above 120% AMI	0.209	0.237	0.253
Theil's H Multi-racial	All	0.018	0.033	0.043

Universe: Population.

Source: Income data for 2015 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data. Data for 2010 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2006-2010 Low- and Moderate-Income Summary Data.

Table 13: Regional Racial Segregation Measures

Index	Group	2010	2020
Isolation Index Regional Level	Asian/Pacific Islander	0.317	0.378
	Black/African American	0.144	0.118
	Latinx	0.283	0.291
	White	0.496	0.429
	People of Color	0.629	0.682
Dissimilarity Index Regional Level	Asian/Pacific Islander vs. White	0.384	0.369
	Black/African American vs. White	0.475	0.459
	Latinx vs. White	0.301	0.297
	People of Color vs. White	0.296	0.293
Theil's H Multi-racial	All Racial Groups	0.103	0.097

Universe: Population.

Source: IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002. Data from 2010 is from U.S. Census Bureau, 2010 Census of Population and Housing, Table P4.

Table 14: Regional Income Segregation Measures

Index	Group	2010	2015
Isolation Index Regional Level	Very Low-Income (<50% AMI)	0.277	0.315
	Low-Income (50%-80% AMI)	0.157	0.154
	Moderate-Income (80%-120% AMI)	0.185	0.180
	Above Moderate-Income (>120% AMI)	0.467	0.435
Dissimilarity Index Regional Level	Below 80% AMI vs. Above 80% AMI	0.186	0.194
	Below 50% AMI vs. Above 120% AMI	0.238	0.248
Theil's H Multi-income	All Income Groups	0.034	0.032

Universe: Population.

Source: Data for 2015 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data. Data for 2010 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2006-2010 Low- and Moderate-Income Summary Data.

Table 15: Population by Racial Group, Belmont and the Region

Race	Belmont			Bay Area
	2000	2010	2020	2020
Asian/Pacific Islander	15.3%	20.44%	29.86%	35.8%
Black/African American	1.55%	1.56%	1.23%	5.6%
Latinx	8.32%	11.52%	12.43%	28.2%
Other or Multiple Races	4.4%	5.21%	8.58%	24.4%
White	70.44%	61.28%	47.9%	5.9%

Universe: Population.

Source: IPUMS National Historical Geographic Information System (NHGIS). U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002. Data from 2010 is from U.S. Census Bureau, 2010 Census of Population and Housing, Table P4. Data for 2000 is standardized to 2010 census tract geographies and is from U.S. Census Bureau, Census 2000, Table P004.

Table 16: Population by Income Group, Belmont and the Region

Income Group	Belmont		Bay Area
	2010	2015	2015
Very Low-Income (<50% AMI)	15.7%	21.99%	28.7%
Low-Income (50%-80% AMI)	13.56%	10.7%	14.3%
Moderate-Income (80%-120% AMI)	21.12%	17.12%	17.6%
Above Moderate-Income (>120% AMI)	49.62%	50.19%	39.4%

Universe: Population.

Source: Data for 2015 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2011-2015 Low- and Moderate-Income Summary Data. Data for 2010 is from U.S. Department of Housing and Urban Development, American Community Survey 5-Year 2006-2010 Low- and Moderate-Income Summary Data.

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AFFH Attachment C.5.

Fair Housing Laws & Regulations

This appendix summarizes key state laws and regulations related to mitigating housing discrimination and expanding housing choice.

California Fair Employment and Housing Act (FEHA) (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2) is the state fair housing law that prohibits those engaged in the housing business—landlords, real estate agents, home sellers, builders, mortgage lenders, and others—from discriminating against tenants or homeowners.

California law protects individuals from illegal discrimination by housing providers based on:

- Race, color
- Ancestry, national origin
- Citizenship, immigration status
- Primary language
- Age
- Religion
- Disability, mental or physical
- Sex, gender
- Gender identity, gender expression
- Marital status
- Familial status
- Source of income
- Military or veteran status

Government Code section 65008. Covers actions of a city, county, city and county, or other local government agency, and makes those actions null and void if the action denies an individual or group of individuals the enjoyment of residence, landownership, tenancy, or other land use in the state because of membership in a protected class, the method of financing, and/or the intended occupancy.

- For example, a violation under Government Code section 65008 may occur if a jurisdiction applied more scrutiny to reviewing and approving an affordable

development as compared to market-rate developments, or multifamily housing as compared to single family homes.

- Government Code section 65008, subdivision (e), authorizes preferential treatment of affordable housing

Government Code section 8899.50 requires all public agencies to administer programs and activities relating to housing and community development in a manner to affirmatively further fair housing and avoid any action that is materially inconsistent with its obligation to affirmatively further fair housing.

Government Code section 11135 et seq. requires full and equal access to all programs and activities operated, administered, or funded with financial assistance from the state, regardless of one's membership or perceived membership in a protected class.

Density Bonus Law (Gov. Code, section 65915) requires California jurisdictions to adopt ordinances that specify how density bonuses will be offered to incentivize affordable housing. The state law contains the minimum specifications for density bonuses.

Housing Accountability Act (Gov. Code, section 65589.5) prohibits local agencies from disapproving housing developments, including farmworker housing and emergency shelters, or requiring conditions that make such housing infeasible except under certain conditions specified in the law.

No-Net-Loss Law (Gov. Code, section 65863) is meant to ensure that development opportunities remain available throughout a jurisdiction's regional housing need allocation (RHNA) period, especially for low and moderate income households. It prohibits jurisdictions from lowering residential densities without substantial evidence.

Least Cost Zoning Law (Gov. Code, section 65913.1) requires jurisdictions to designate and zone sufficient vacant land for residential use with sufficient standards in relation to growth projections.

Excessive subdivision standards (Gov. Code, section 65913.2) prohibits jurisdictions from imposing design criteria that make residential development infeasible.

Limits on growth controls (Gov. Code, section 65302.8) describes how flood plains are used in comprehensive planning and zoning.

Housing Element Law (Gov. Code, section 65583, esp. subds. (c) (5), (c) (10) governs state-required housing elements.

APPENDIX C.6. Belmont AFFH Maps and Data Packet

Figure I-1.

Fair Housing Assistance Organizations, San Mateo County

Name	Service Area	Address	Phone	Website
Project Sentinel	Northern California	1490 El Camino Real, Santa Clara, CA 95050	(800) 339-6043	https://www.housing.org/
Legal Aid Society of San Mateo County	San Mateo County	330 Twin Dolphin Drive, Suite 123, Redwood City, CA 94065	(650) 558-0915	https://www.legalaidsmc.org/housing-resources
Community Legal Services of East Palo Alto	East Palo Alto, Menlo Park, Burlingame, Mountain View, Redwood City, and San Francisco	1861 Bay Road, East Palo Alto, CA 94303	(650)-326-6440	https://clsepa.org/services/#housing

Source: Organization Websites

Figure I-2.
Fair Housing Complaints Filed with HUD by Basis, San Mateo County, 2017-2021

Source:
 HUD

	2017	2018	2019	2020	2021	2017-2021 Total	
						Cases	% of Total
Disability	8	9	3	9	3	32	56%
Race	3	5	2	1		11	19%
Familial Status	4	3			1	8	14%
National Origin	2				1	3	5%
Religion		1		1		2	4%
Sex					1	1	2%
Total cases	17	18	5	11	6	57	100%

**Figure I-3.
HCD Fair Housing Inquiries by
City, January 2013-March 2021**

Note:
Atherton, Brisbane, Colma, Hillsborough, Millbrae, and
Portola Valley had no inquiries during this time.

Source:
California Department of Housing and Community
Development

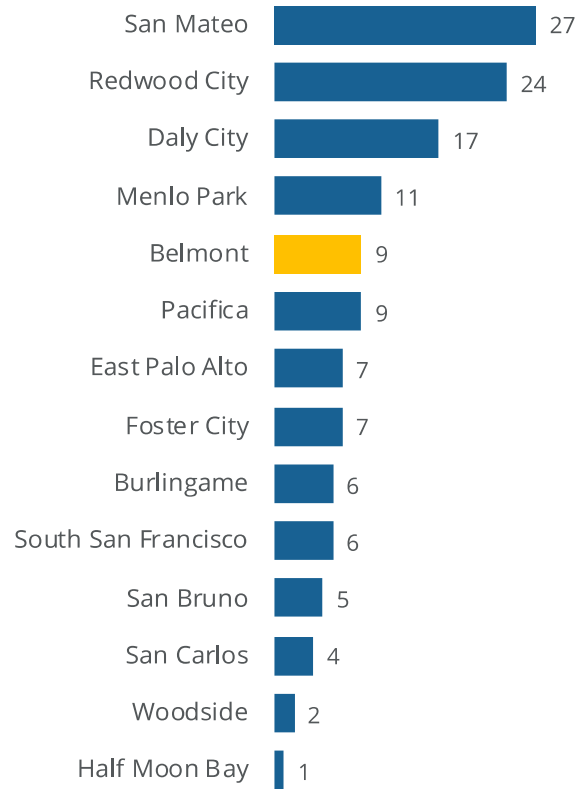


Figure I-4.
FHEO Inquiries by City to HCD, Belmont, 2013-2021

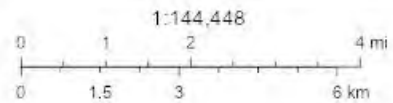


12/9/2021, 11:48:49 AM

City/Town Boundaries

R) FHEO Inquiries by City (HUD, 2013-2021)

- < .25 Inquiries
- < .5 Inquiries



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CA HCD
 Redwood City, County of San Mateo, California, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census |

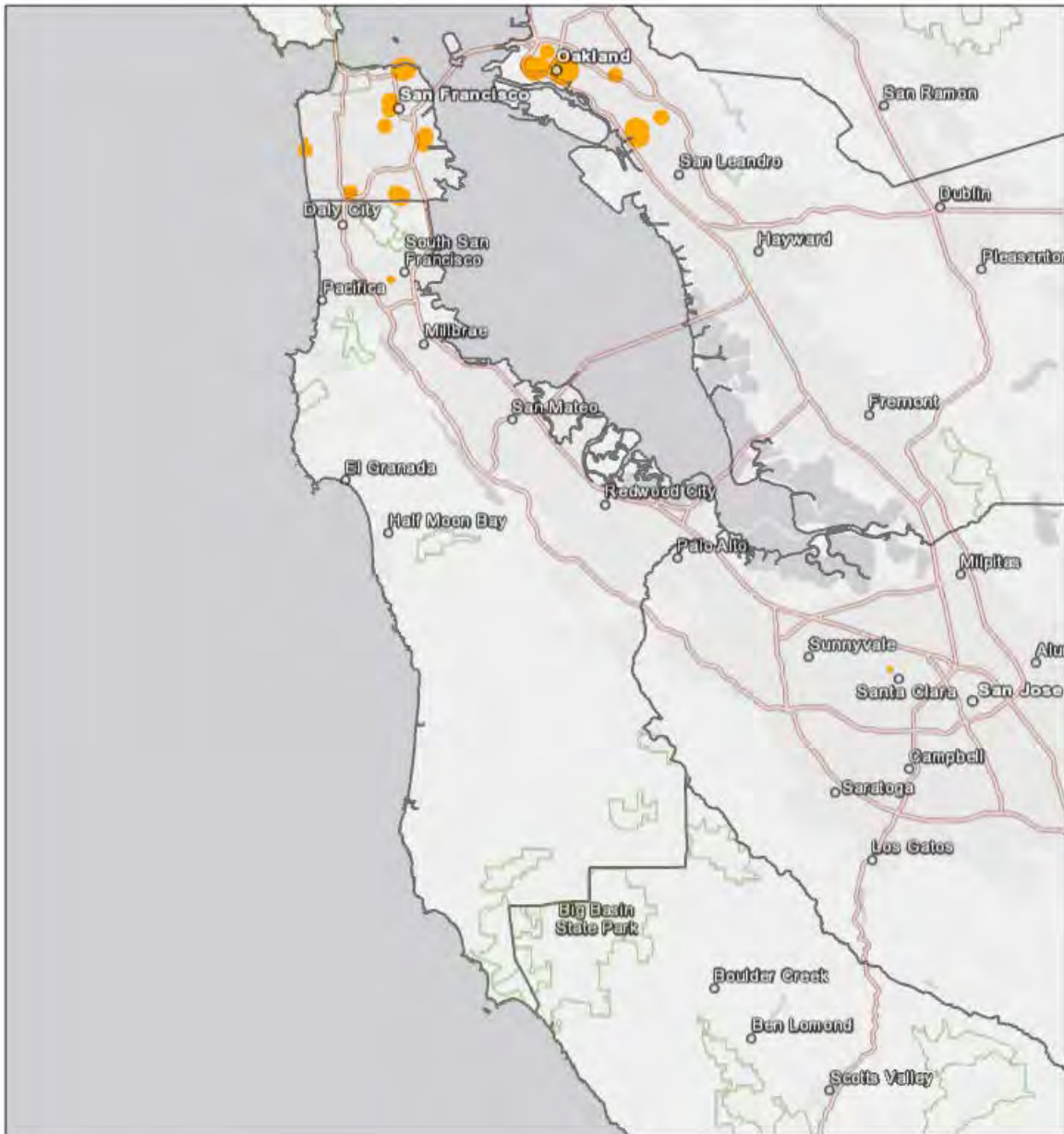
Source: California Department of Housing and Community Development AFFH Data Viewer

**Figure I-5.
HCD Fair Housing Inquiries by Bias, January 2013-March 2021**

Jurisdiction	Disability	Race	Familial Status	National Origin	Religion	Sex	Color	None Cited	Total
Atherton	0	0	0	0	0	0	0	0	0
Belmont	2	0	1	0	0	0	0	6	9
Brisbane	0	0	0	0	0	0	0	0	0
Burlingame	3	0	2	0	0	0	0	1	6
Colma	0	0	0	0	0	0	0	0	0
Daly City	1	2	1	3	0	0	0	9	16
East Palo Alto	1	1	0	0	0	0	0	5	7
Foster City	4	0	0	0	0	0	0	3	7
Half Moon Bay	0	0	0	0	0	0	0	1	1
Hillsborough	0	0	0	0	0	0	0	0	0
Menlo Park	3	0	0	0	0	1	0	5	9
Millbrae	0	0	0	0	0	0	0	0	0
Pacifica	3	0	0	1	0	1	0	4	9
Portola Valley	0	0	0	0	0	0	0	0	0
Redwood City	5	1	1	1	0	1	0	15	24
San Bruno	0	0	0	0	0	0	0	5	5
San Carlos	1	0	1	0	0	0	0	2	4
San Mateo	4	2	2	2	0	0	0	16	26
South San Francisco	0	0	0	1	0	0	0	5	6
Woodside	0	0	0	0	0	0	0	2	2

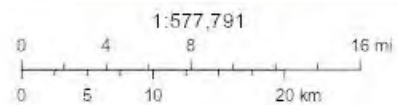
Source: California Department of Housing and Community Development AFFH Data Viewer

**Figure I-6.
Public Housing Buildings, San Mateo County**



9/28/2021, 11:37:11 AM

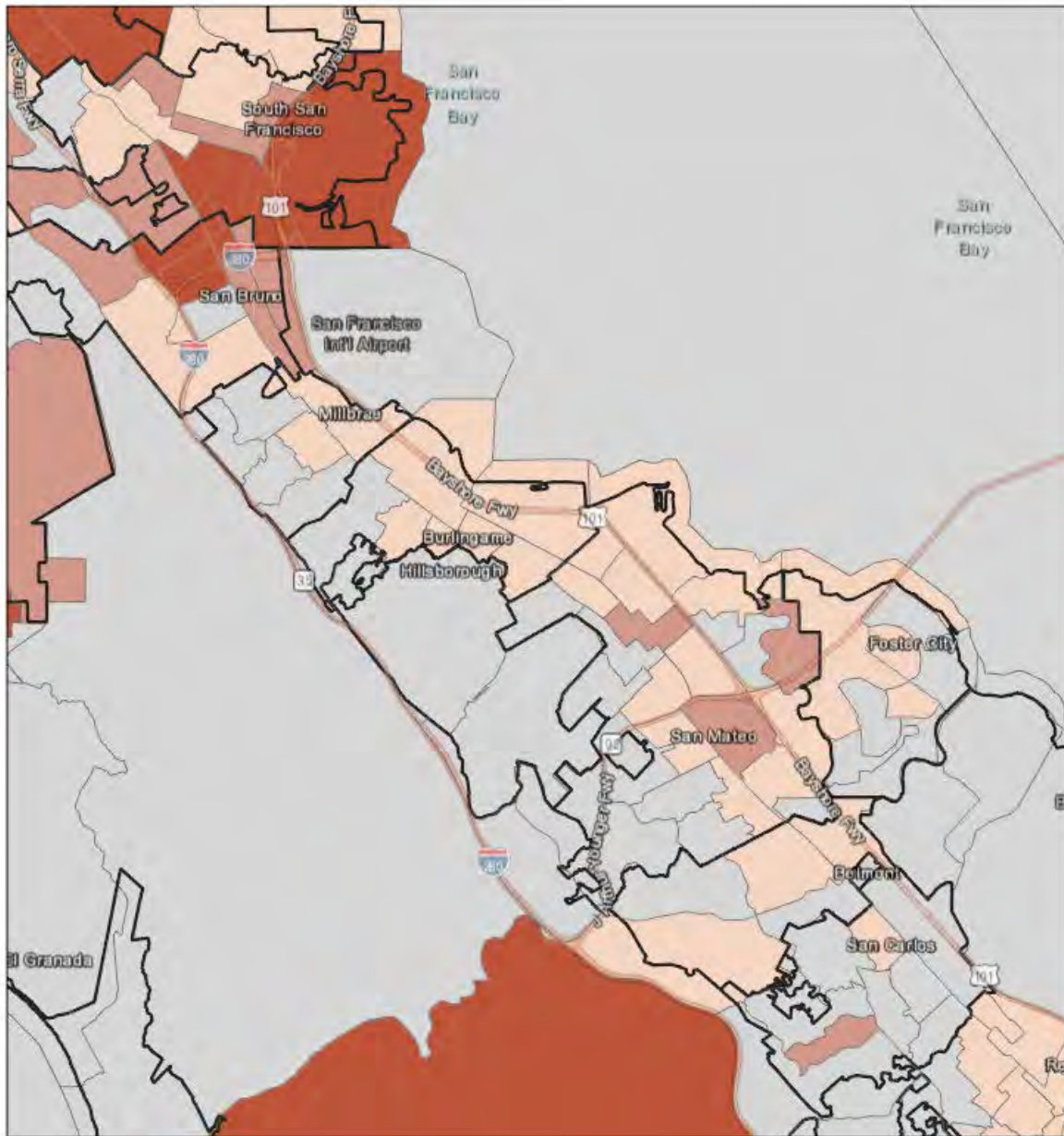
- County Boundaries
- 8 - 35 Units
- (R) Public Housing Buildings 36 - 89 Units
- ≤ 7 Units
- 90 - 160 Units



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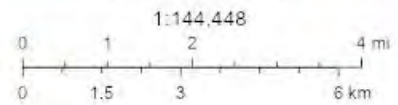
Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing and Community Development AFFH Data Viewer

Figure I-7.
Housing Choice Vouchers by Census Tract



9/28/2021, 10:43:16 AM

- City/Town Boundaries
- > 0 – 5%
- > 5% – 15%
- > 15% – 30%
- (R) Housing Choice Vouchers - Tract
- No Data



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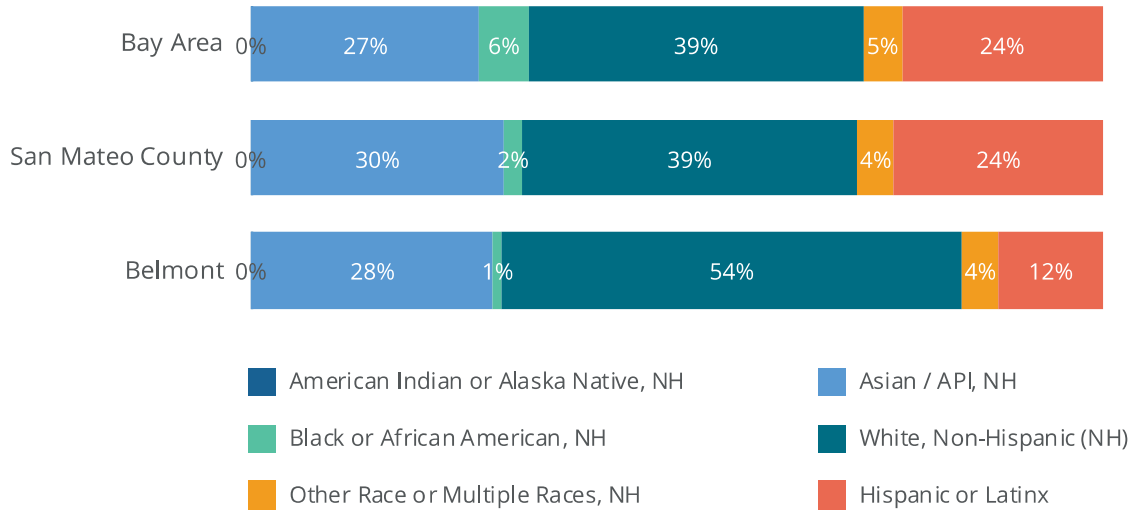
Source: California Department of Housing and Community Development AFFH Data Viewer

SECTION II. Integration and Segregation

Race and ethnicity.

Figure II-1.

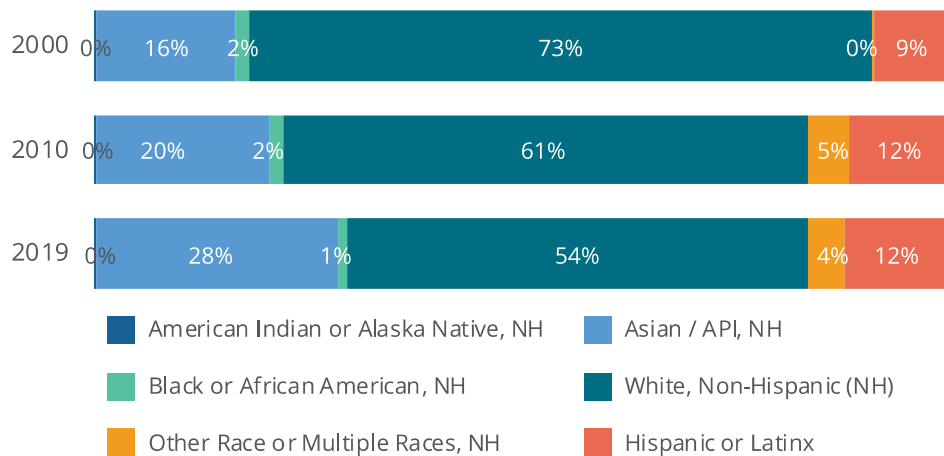
Population by Race and Ethnicity, 2019



Source: ABAG Housing Needs Data Workbook

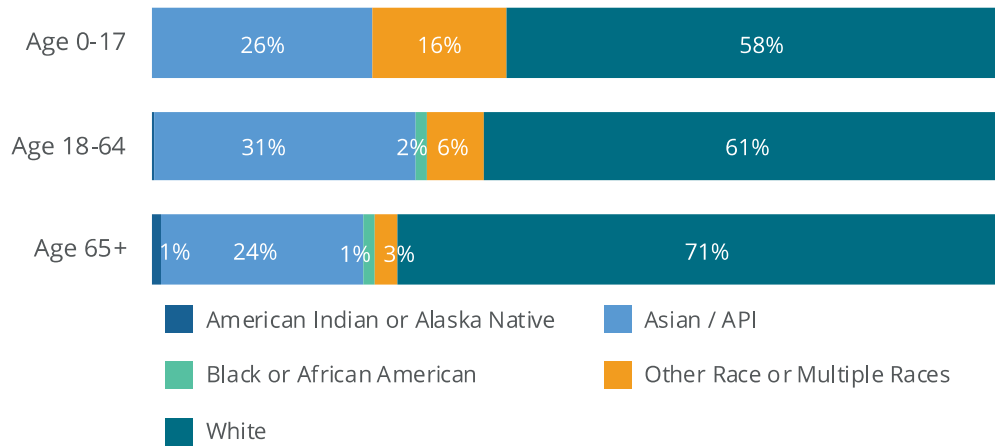
Figure II-2.

Population by Race and Ethnicity, Belmont, 2000-2019



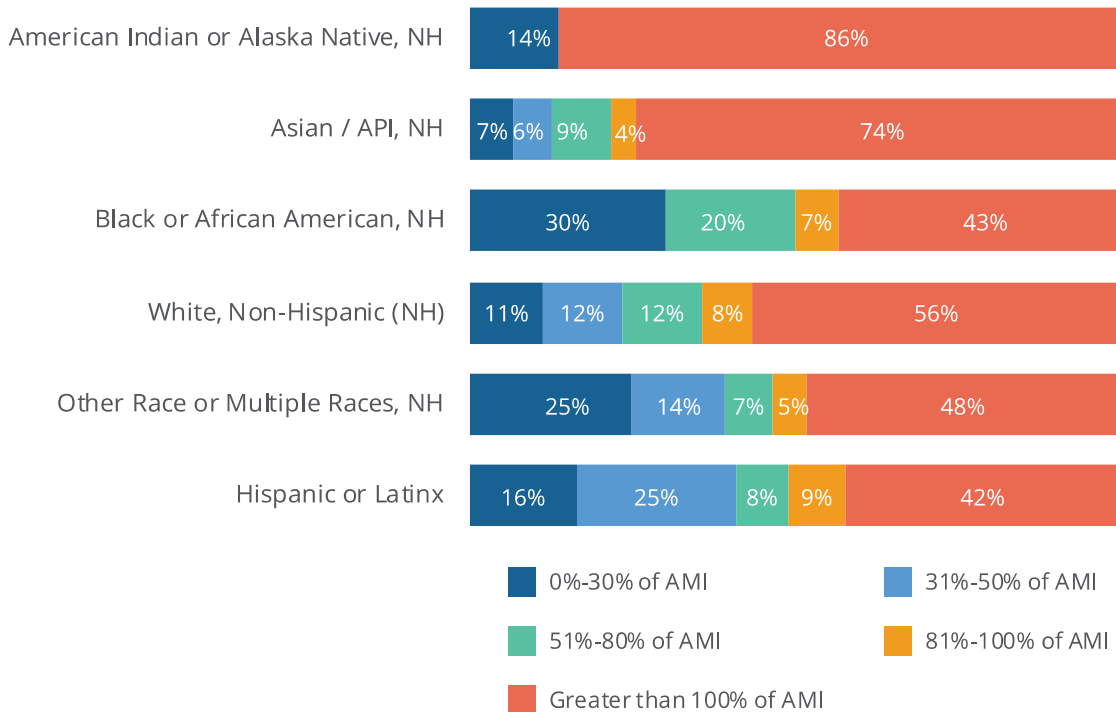
Source: ABAG Housing Needs Data Workbook

Figure II-3.
Senior and Youth Population by Race, Belmont, 2000-2019



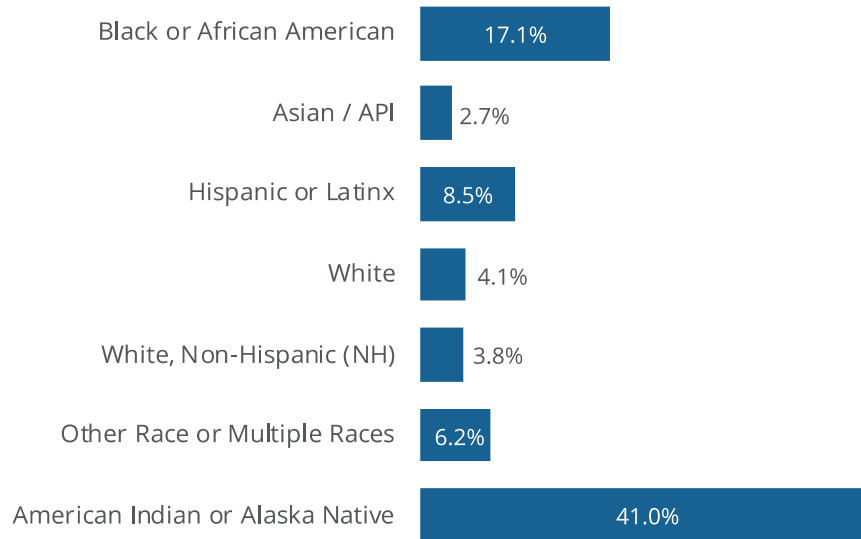
Source: ABAG Housing Needs Data Workbook

Figure II-4.
Area Median Income by Race and Ethnicity, Belmont, 2019



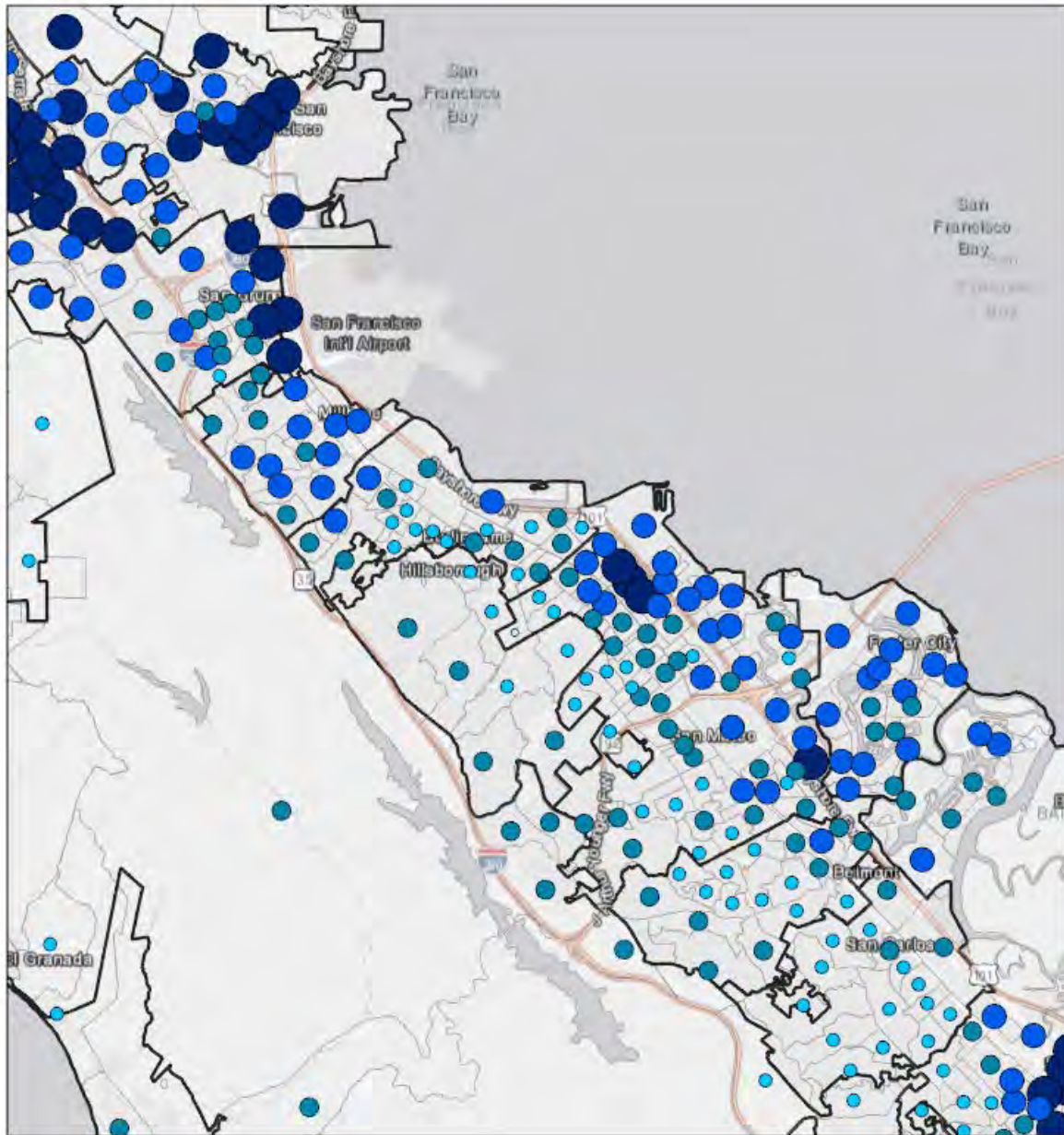
Source: ABAG Housing Needs Data Workbook

Figure II-5.
Poverty Rate by Race and Ethnicity, Belmont, 2019



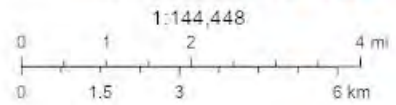
Source: ABAG Housing Needs Data Workbook

Figure II-6.
% Non-White Population by Census Block Groups, 2018



9/28/2021, 10:51:26 AM

- City/Town Boundaries
- (R) Racial Demographics (2018) - Block Group - Graduated Dots
 - 0 - 20%
 - 20% - 40%
 - 40% - 60%
 - 60% - 80%
 - 80% - 100%

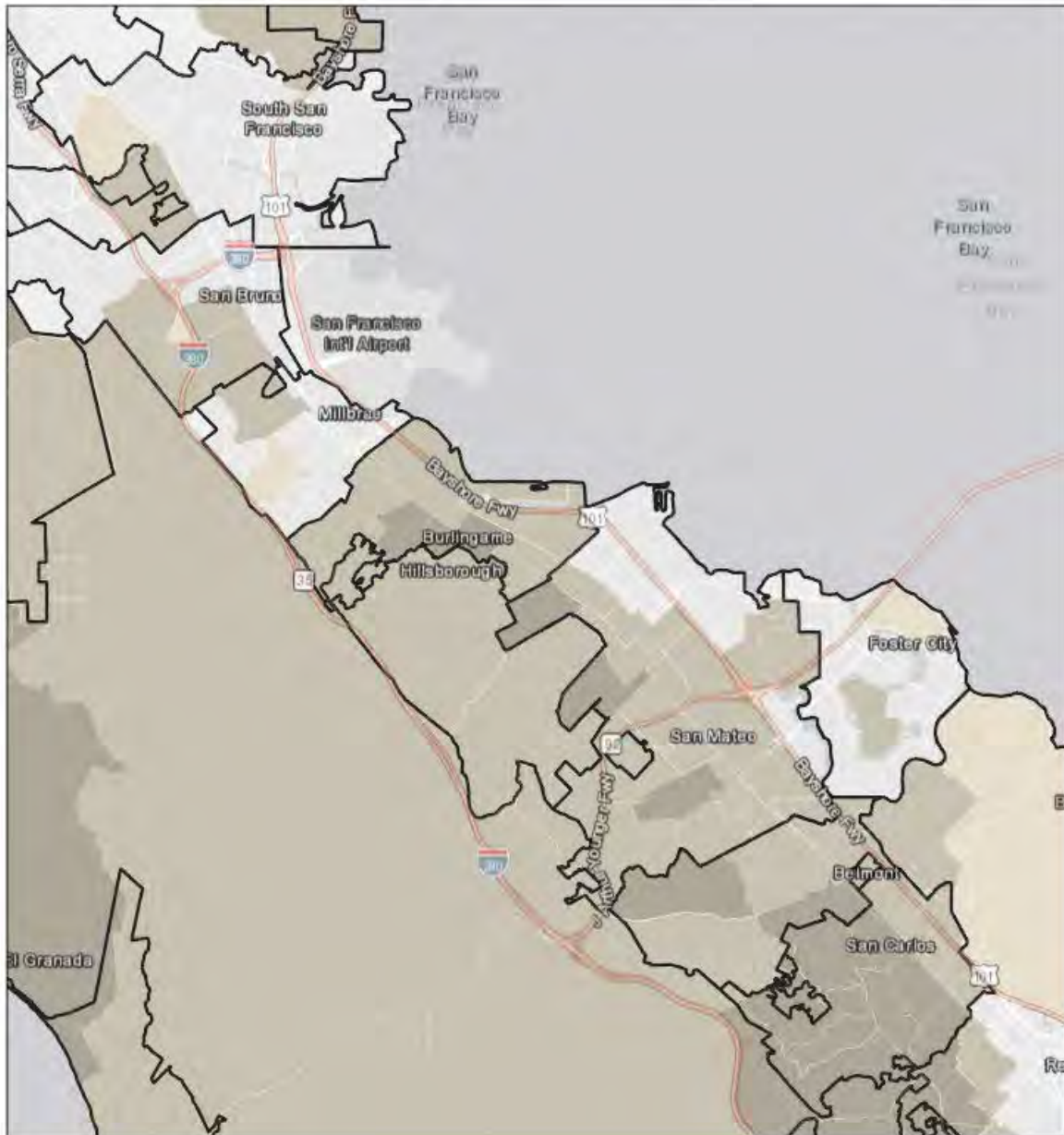


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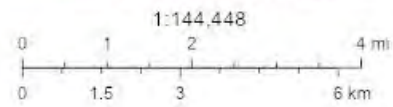
Source: California Department of Housing and Community Development AFFH Data Viewer

**Figure II-7.
White Majority Census Tracts**



9/28/2021, 10:45:38 AM

-  City/Town Boundaries
- (R) Predominant Population - White Majority Tracts
 -  Slim (gap < 10%)
 -  Sizeable (gap 10% – 50%)
 -  Predominant (gap > 50%)

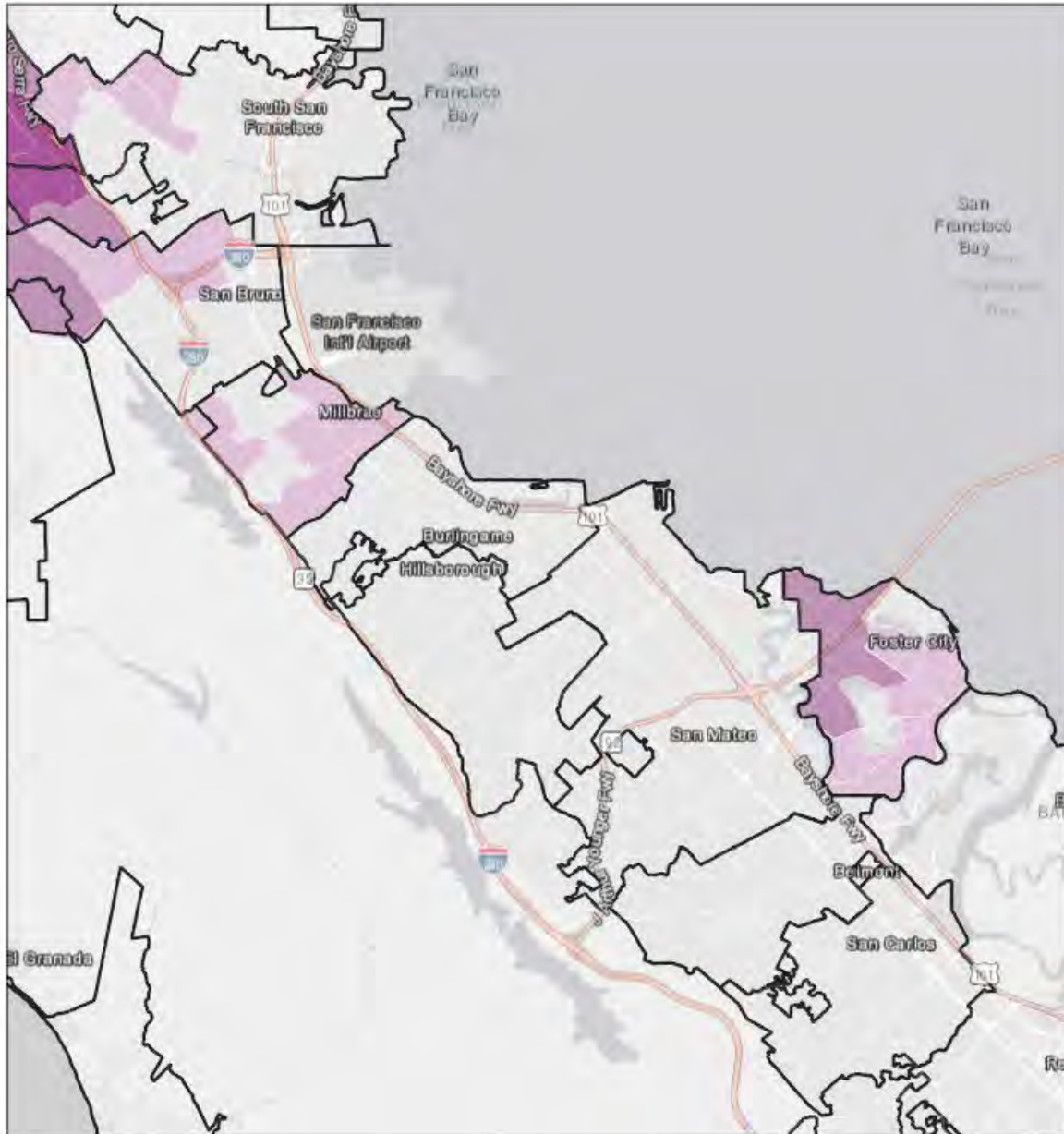


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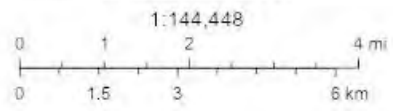
Source: California Department of Housing and Community Development AFFH Data Viewer

Figure II-8.
Asian Majority Census Tracts



9/28/2021, 10:47:17 AM

- City/Town Boundaries
- (R) Predominant Population - Asian Majority Tracts
 - Slim (gap < 10%)
 - Sizeable (gap 10% – 50%)
 - Predominant (gap > 50%)

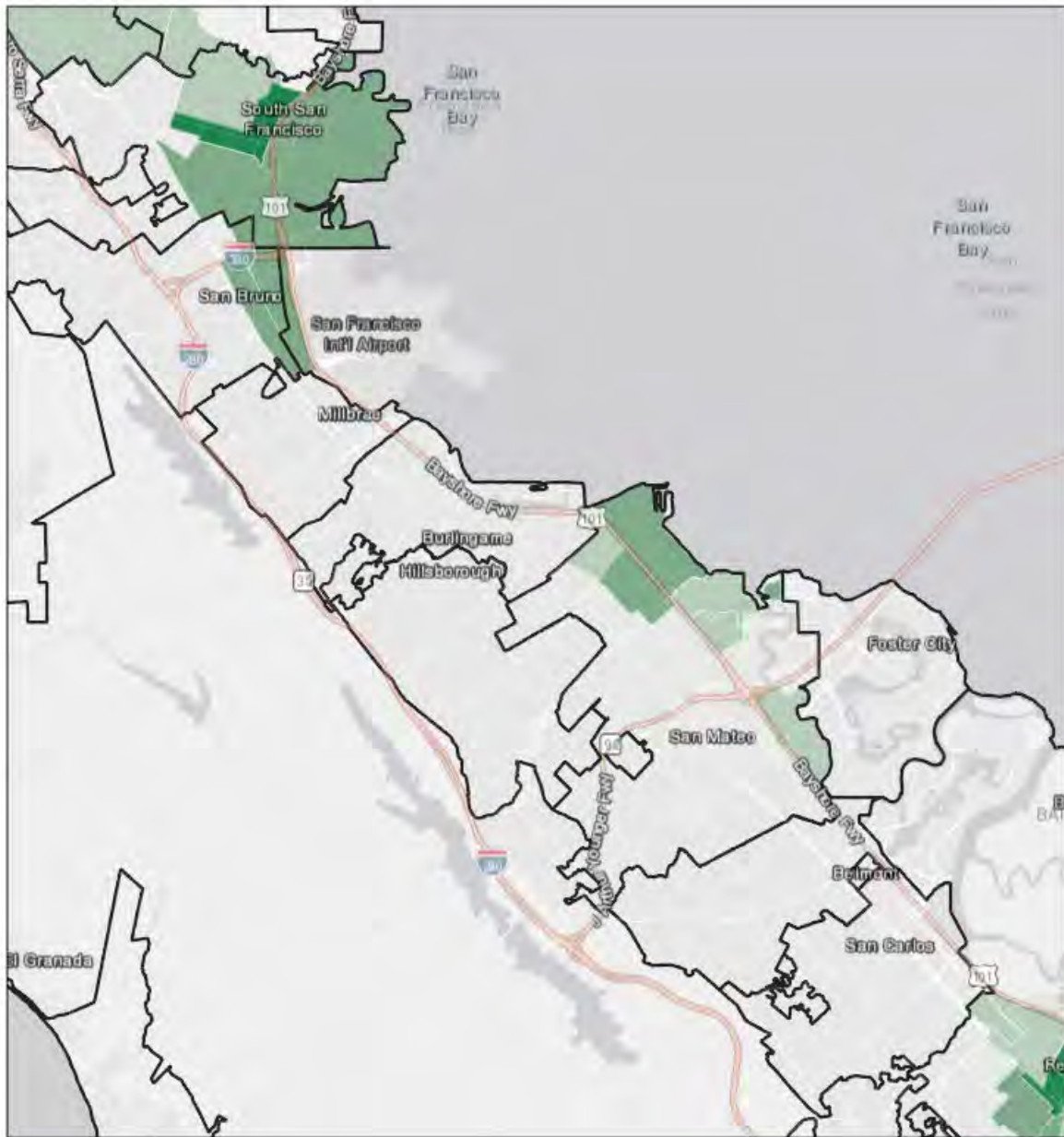


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
County of San Mateo, California, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021

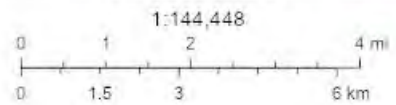
Source: California Department of Housing and Community Development AFFH Data Viewer

**Figure II-9.
Hispanic Majority Census Tracts**



9/28/2021, 10:46:32 AM

-  City/Town Boundaries
- (R) Predominant Population - Hispanic Majority Tracts
 -  Slim (gap < 10%)
 -  Sizeable (gap 10% – 50%)
 -  Predominant (gap > 50%)



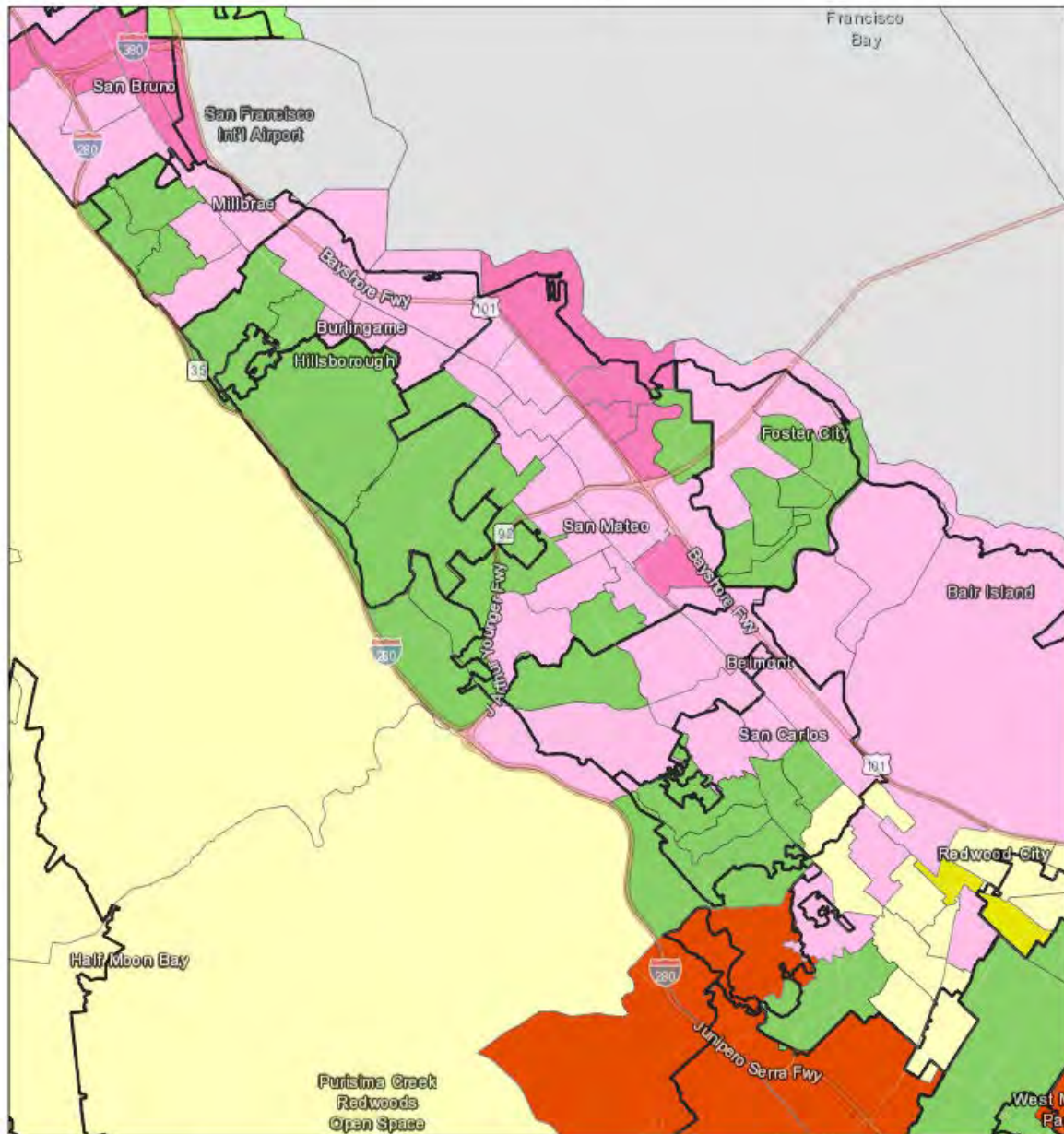
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CA HCD

Source: California Department of Housing and Community Development AFFH Data Viewer

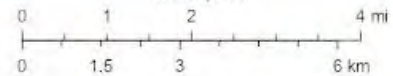
Figure II-10.
Neighborhood Segregation by Census Tract, 2019



10/4/2021, 2:54:42 PM

- City/Town Boundaries
- Mostly Latinx
- Mostly White
- Asian-Latinx
- Asian-White
- 3 Group Mix
- 4 Group Mix
- Unpopulated Tract
- Latinx-White

1:144,448

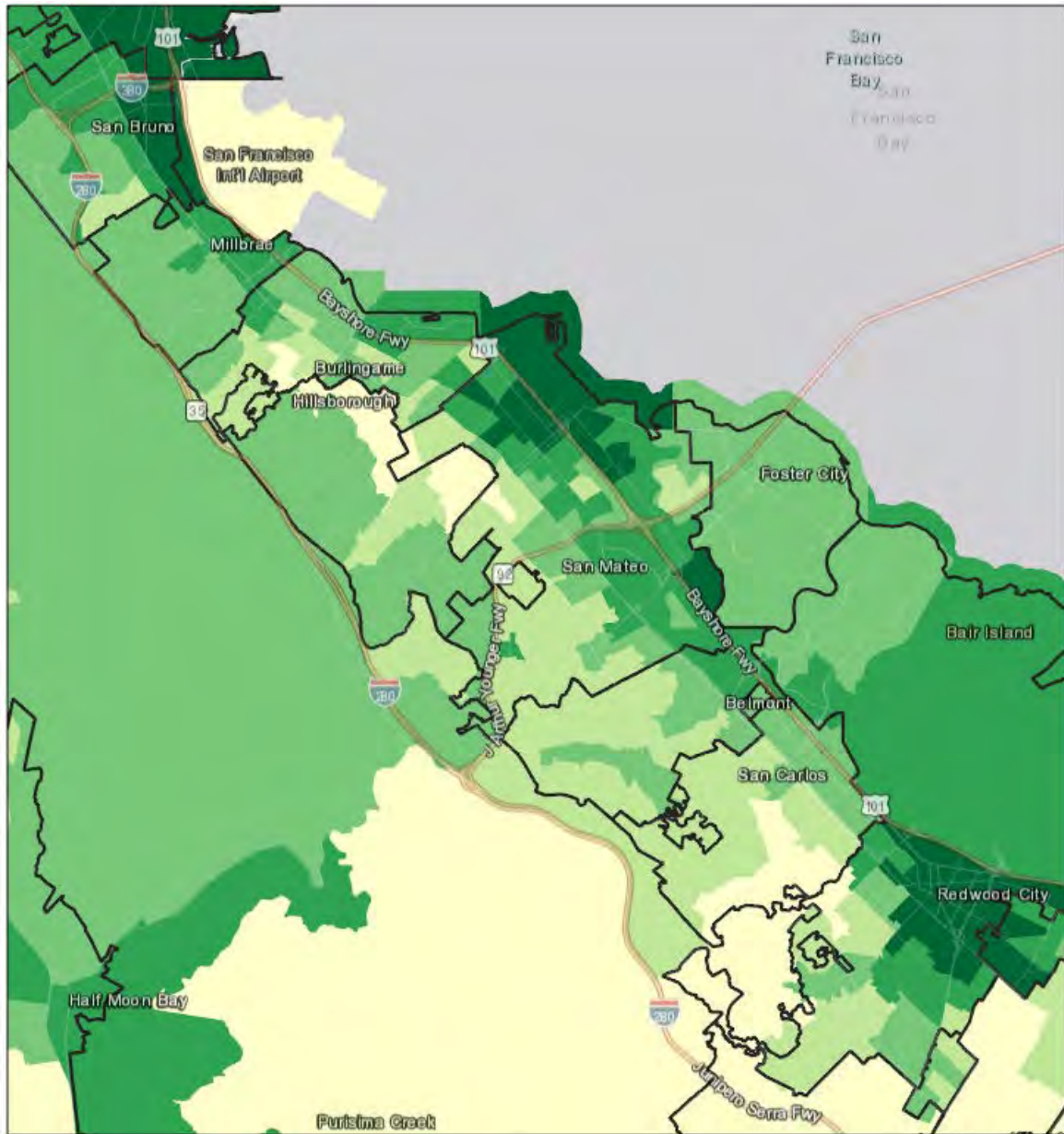


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Source: California Department of Housing and Community Development AFFH Data Viewer

Figure II-11.
Diversity Index by Block Group, 2010



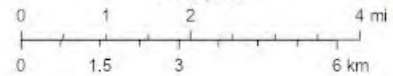
10/4/2021, 2:55:28 PM

1:144,448

City/Town Boundaries

(A) Diversity Index (2010) - Block Group

Lower Diversity



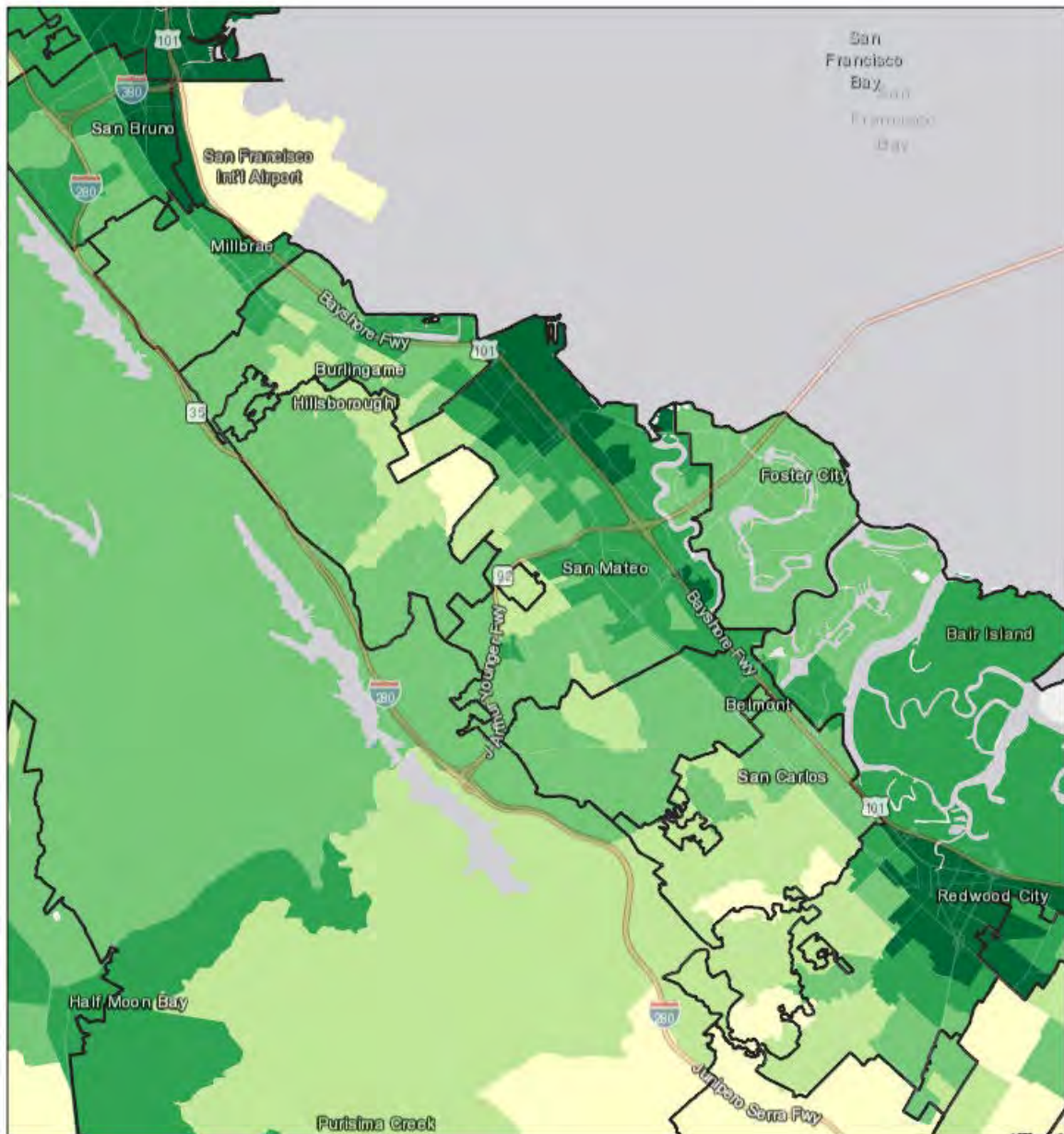
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CA HCD

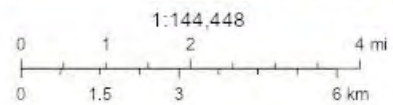
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Source: California Department of Housing and Community Development AFFH Data Viewer

Figure II-12.
Diversity Index by Block Group, 2018



10/4/2021, 2:57:39 PM



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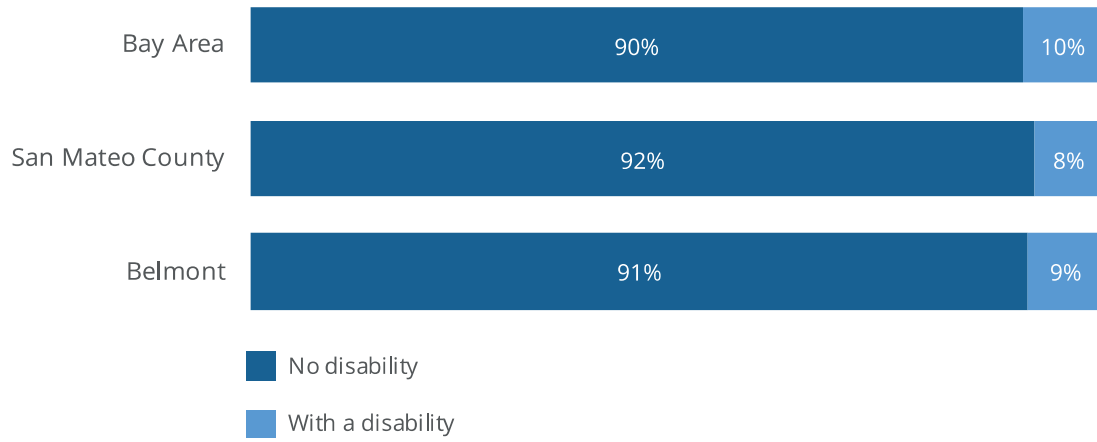
County of San Mateo, California, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, CA HCD

Source: California Department of Housing and Community Development AFFH Data Viewer

Disability status.

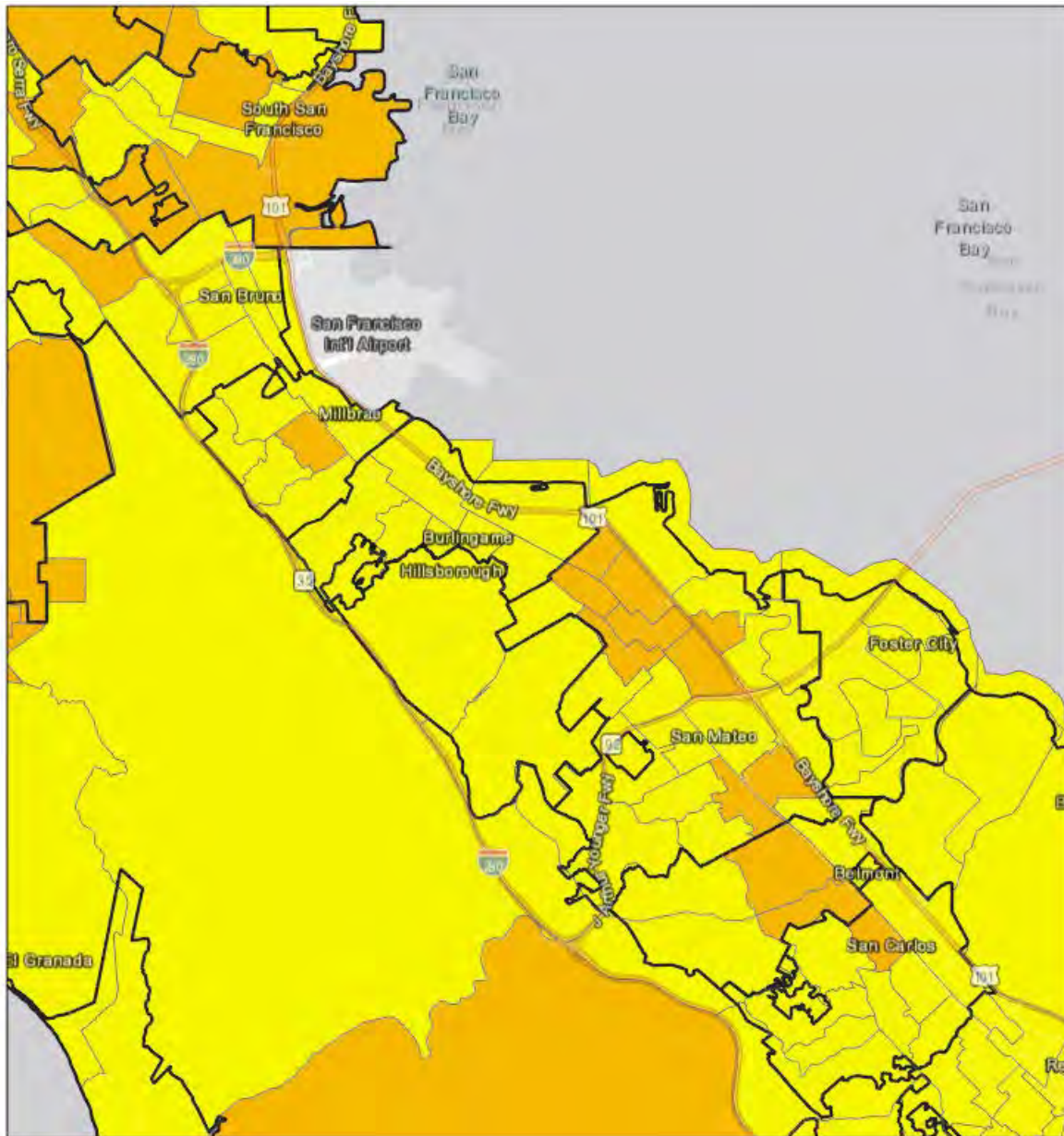
Figure II-13.

Share of Population by Disability Status, 2019



Source: ABAG Housing Needs Data Workbook

Figure II-14.
% of Population with a Disability by Census Tract, 2019

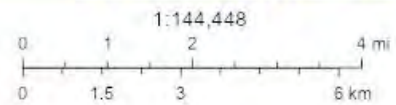


9/28/2021, 10:53:13 AM

City/Town Boundaries

(R) Population with a Disability (ACS, 2015 - 2019) - Tract

- < 10%
- 10% - 20%



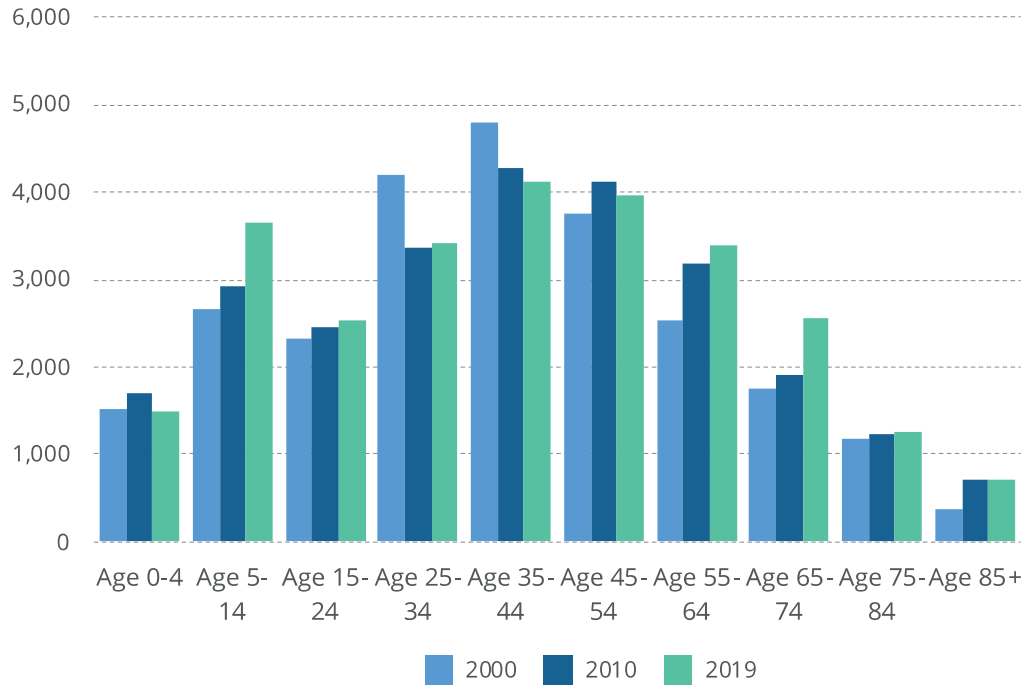
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Source: California Department of Housing and Community Development AFFH Data Viewer

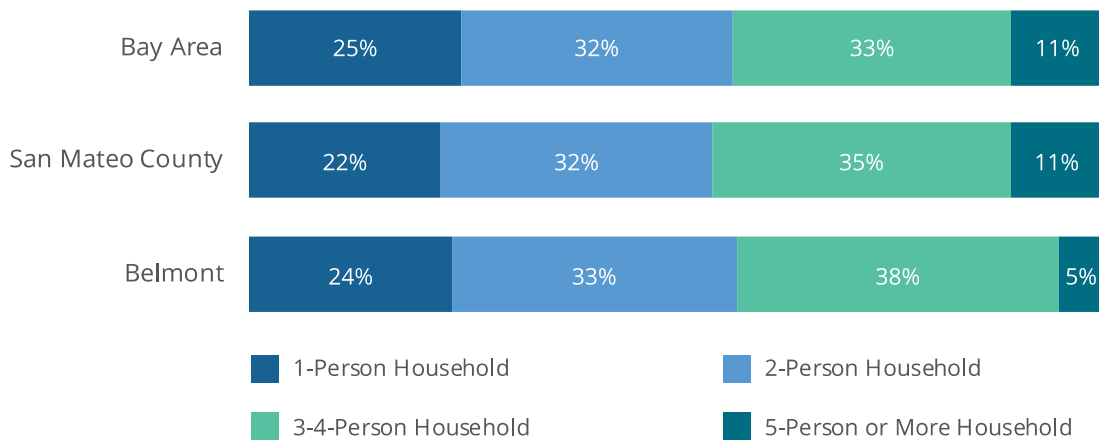
Familial status.

**Figure II-15.
Age Distribution, Belmont, 2000-2019**



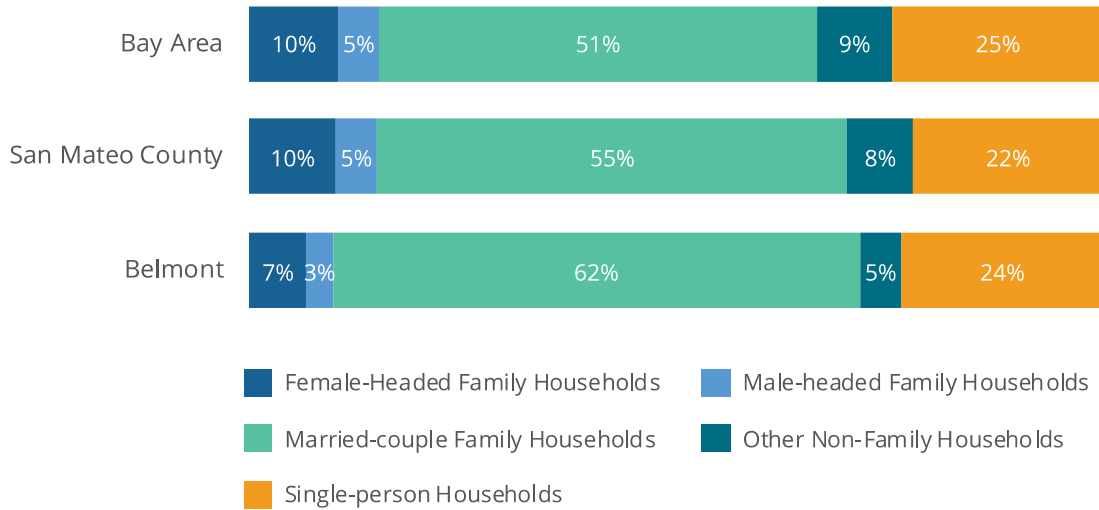
Source: ABAG Housing Needs Data Workbook

**Figure II-16.
Share of Households by Size, 2019**



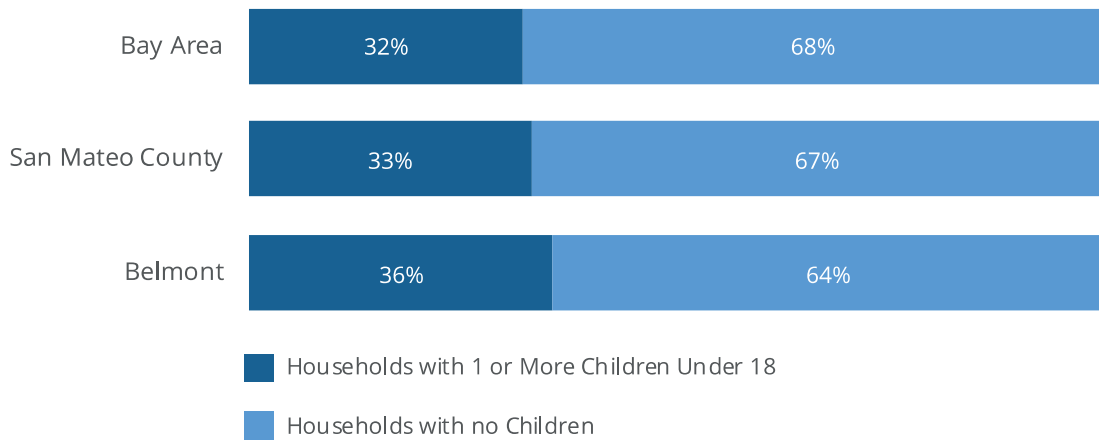
Source: ABAG Housing Needs Data Workbook

Figure II-17.
Share of Households by Type, 2019



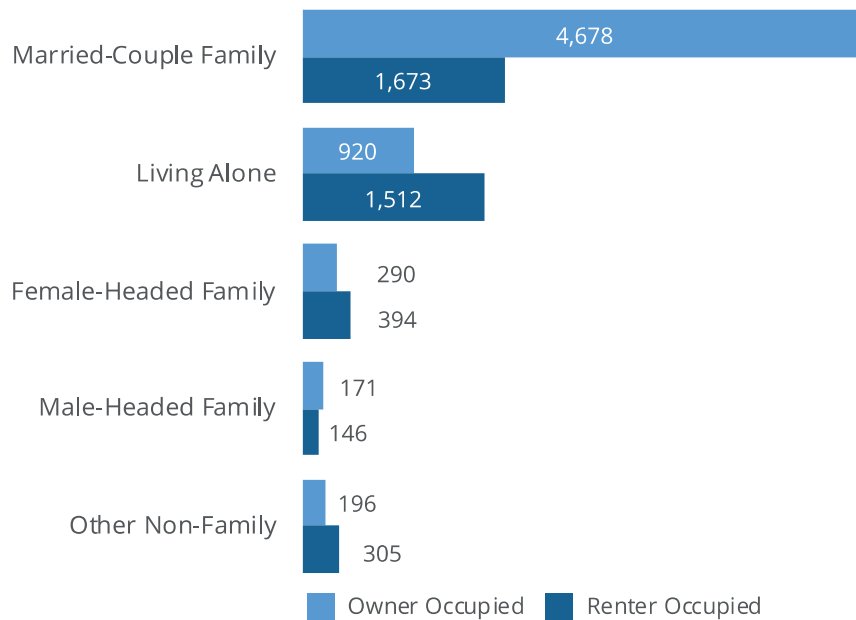
Source: ABAG Housing Needs Data Workbook

Figure II-18.
Share of Households by Presence of Children (Less than 18 years old), 2019



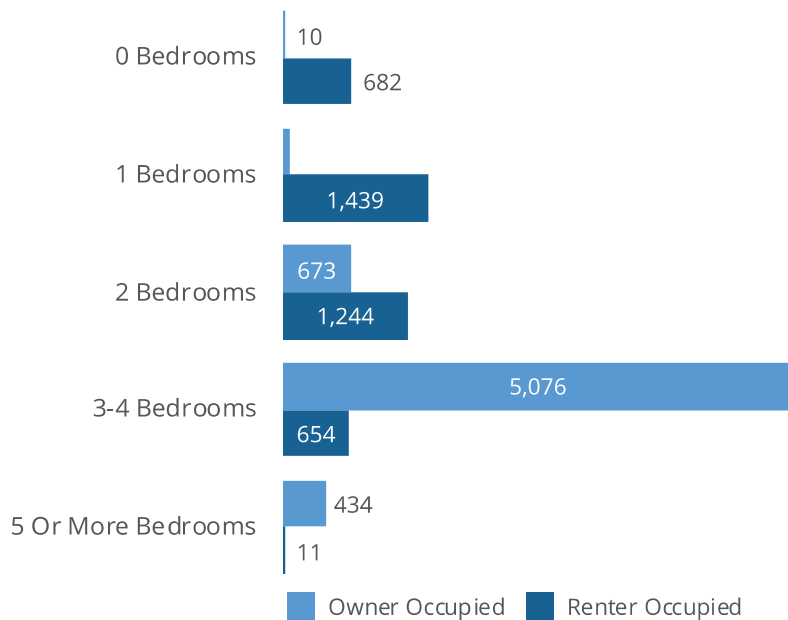
Source: ABAG Housing Needs Data Workbook

Figure II-19.
Housing Type by Tenure, Belmont, 2019



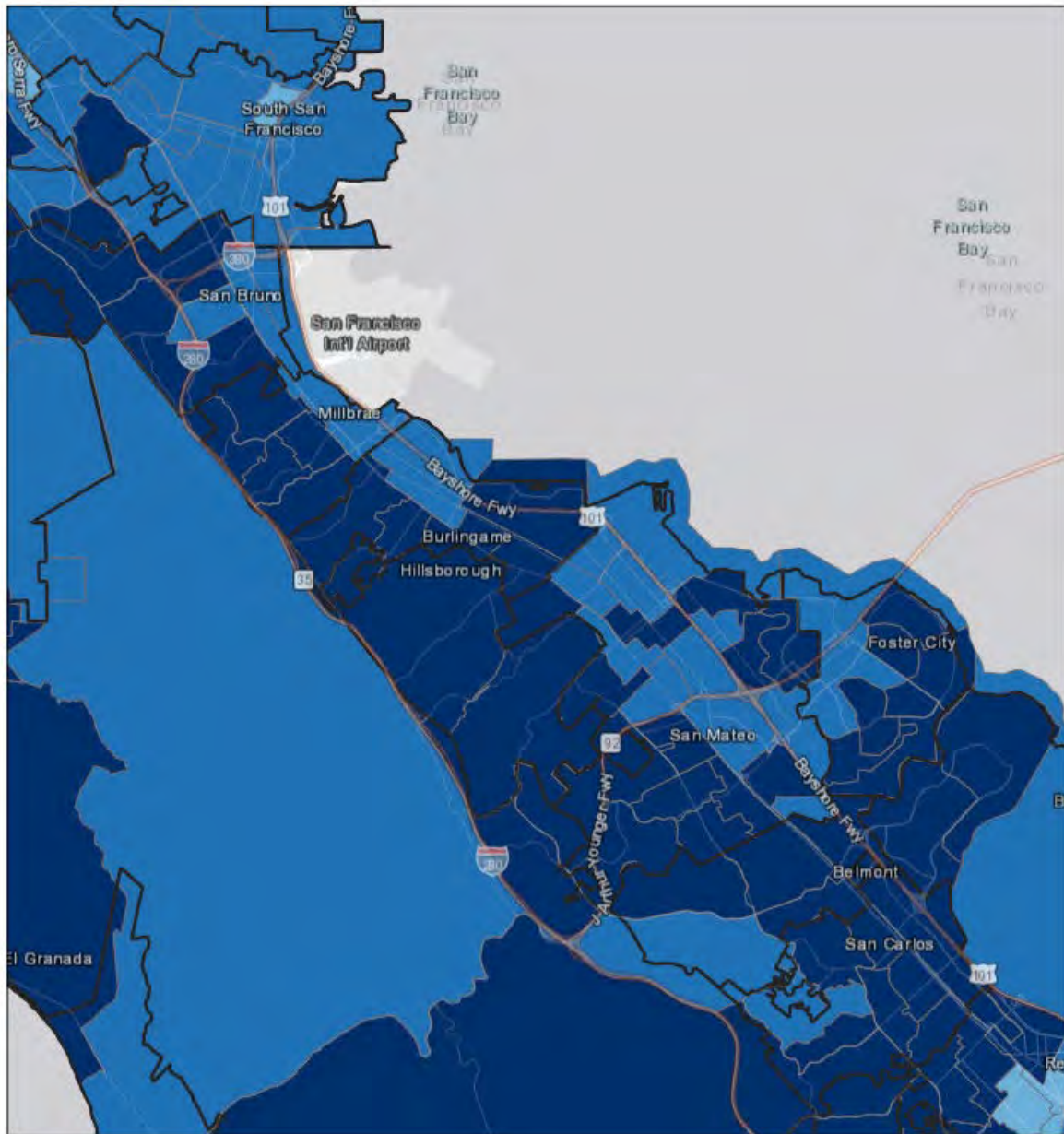
Source: ABAG Housing Needs Data Workbook

Figure II-20.
Housing Units by Number of Bedrooms and Tenure, Belmont, 2019



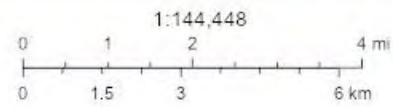
Source: ABAG Housing Needs Data Workbook

Figure II-21.
% of Children in Married Couple Households by Census Tract, 2019



9/28/2021, 10:57:04 AM

City/Town Boundaries
 (R) Percent of Children in Married - Couple Households (ACS, 2015-2019) - Tract
 40% - 60%
 60% - 80%
 > 80%

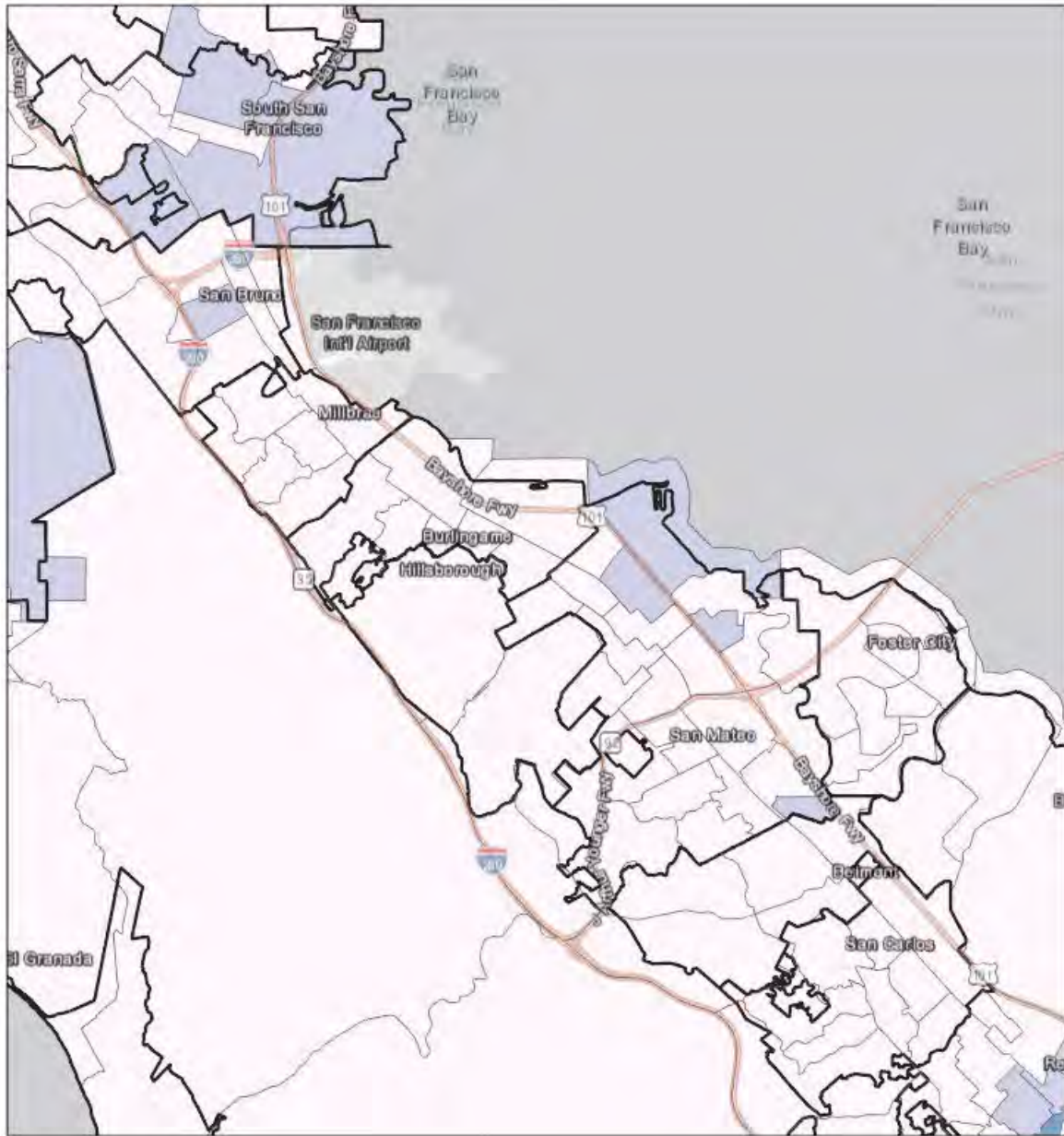


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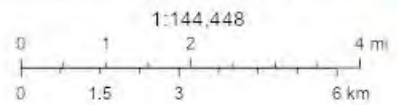
Source: California Department of Housing and Community Development AFFH Data Viewer

Figure II-22.
% Households with Single Female with Children by Census Tract, 2019



9/28/2021, 10:55:33 AM

City/Town Boundaries

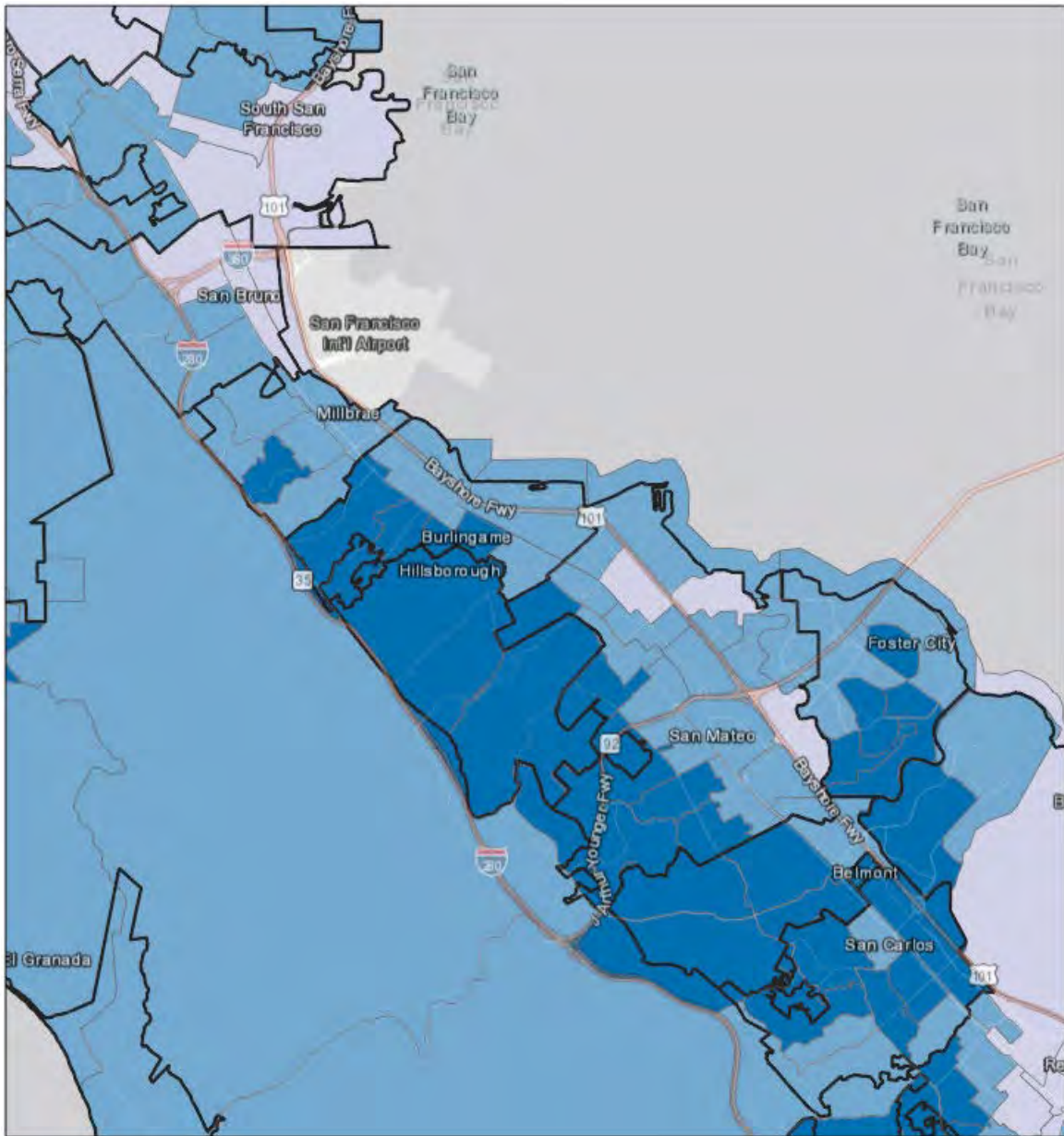


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County of San Mateo, California, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks, 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021

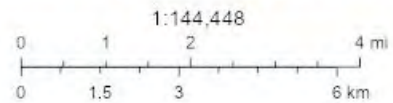
Source: California Department of Housing and Community Development AFFH Data Viewer

Figure II-23.
% of Married Couple Households by Census Tract, 2019



9/28/2021, 10:56:16 AM

City/Town Boundaries

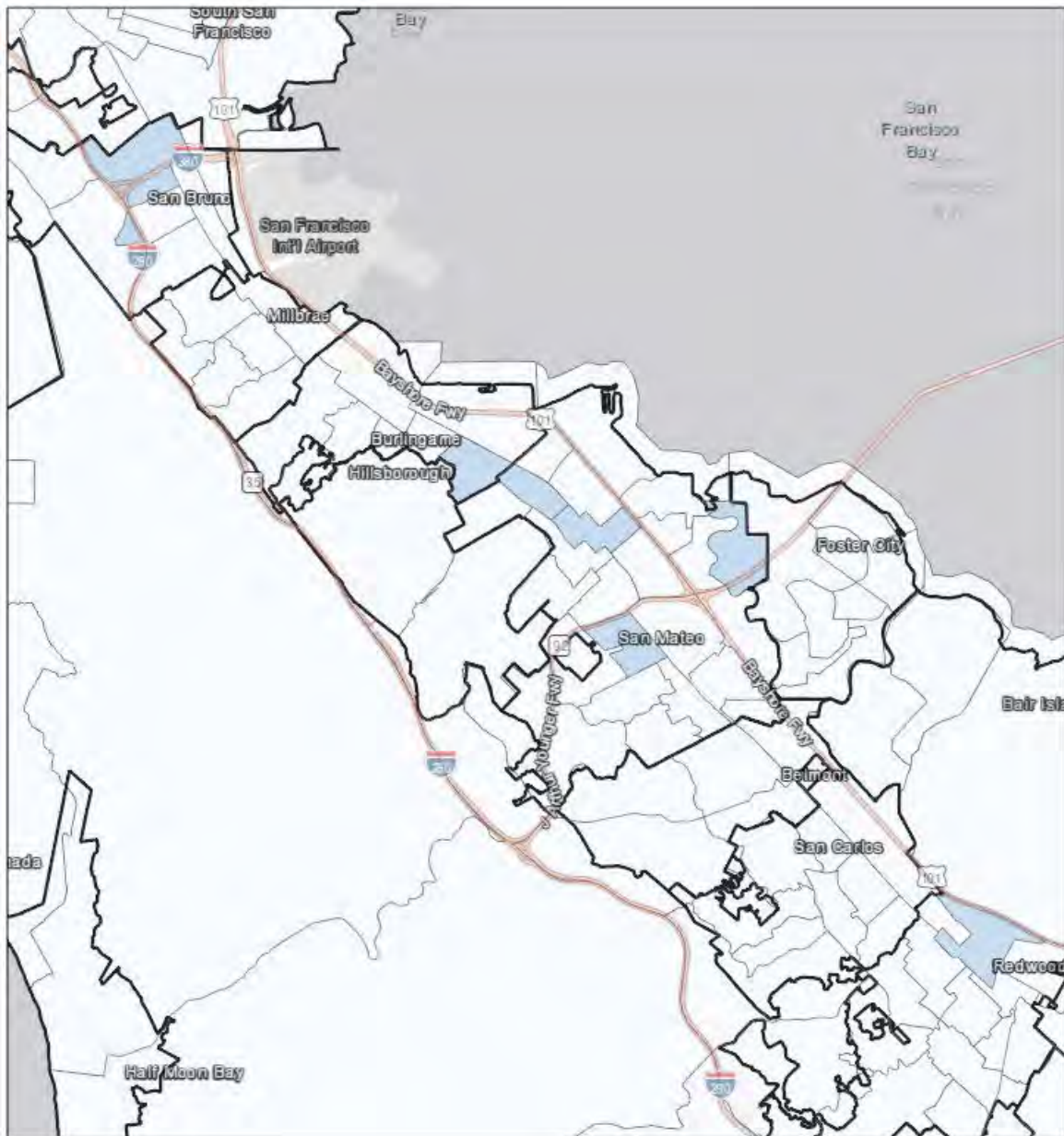


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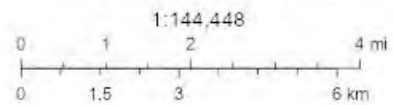
Source: California Department of Housing and Community Development AFFH Data Viewer

Figure II-24.
% of Adults Living Alone by Census Tract, 2019



9/29/2021, 10:00:36 AM

City/Town Boundaries



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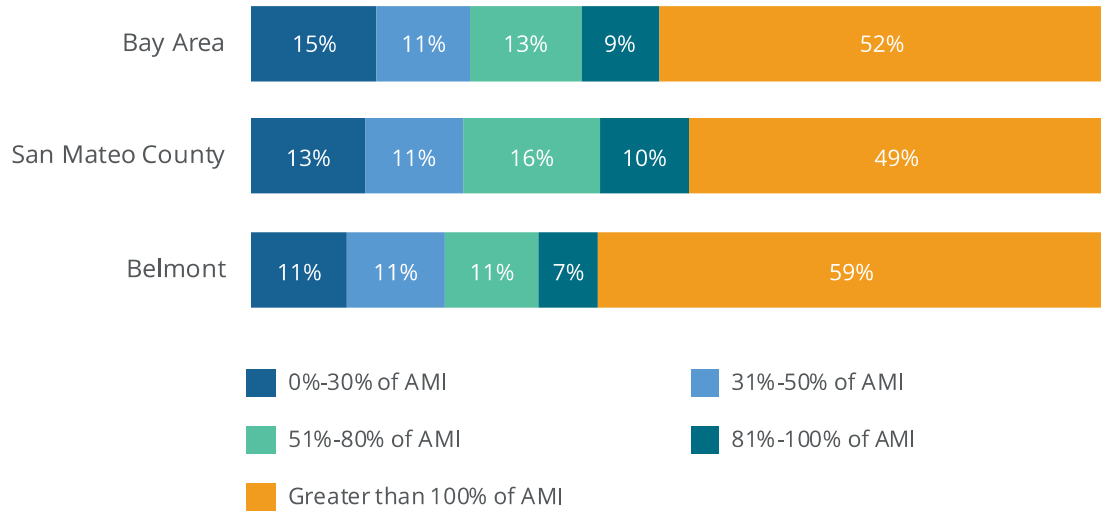
County of San Mateo, California; Bureau of Land Management; Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, CA HCD

Source: California Department of Housing and Community Development AFFH Data Viewer

Household income.

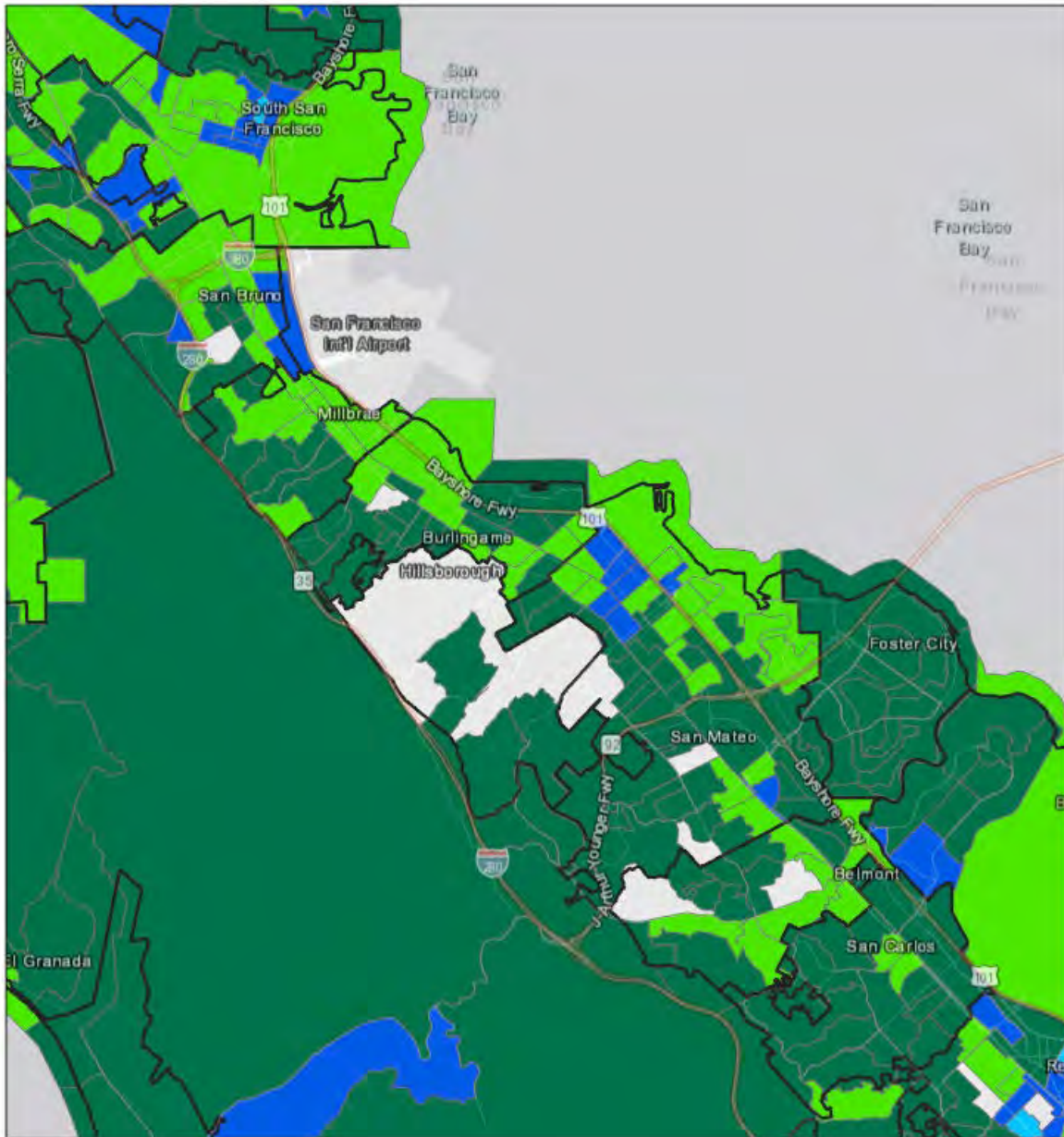
Figure II-25.

Share of Households by Area Median Income (AMI), 2019



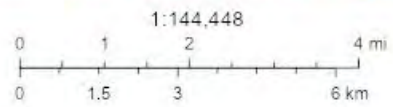
Source: ABAG Housing Needs Data Workbook

Figure II-26.
Median Household Income by Block Group, 2019



9/28/2021, 10:54:44 AM

- City/Town Boundaries
- (R) Median Income (ACS, 2015-2019) - Block Group
- < \$55,000
- < \$87,100 (HCD 2020 State Median Income)
- < \$125,000
- Greater than \$125,000

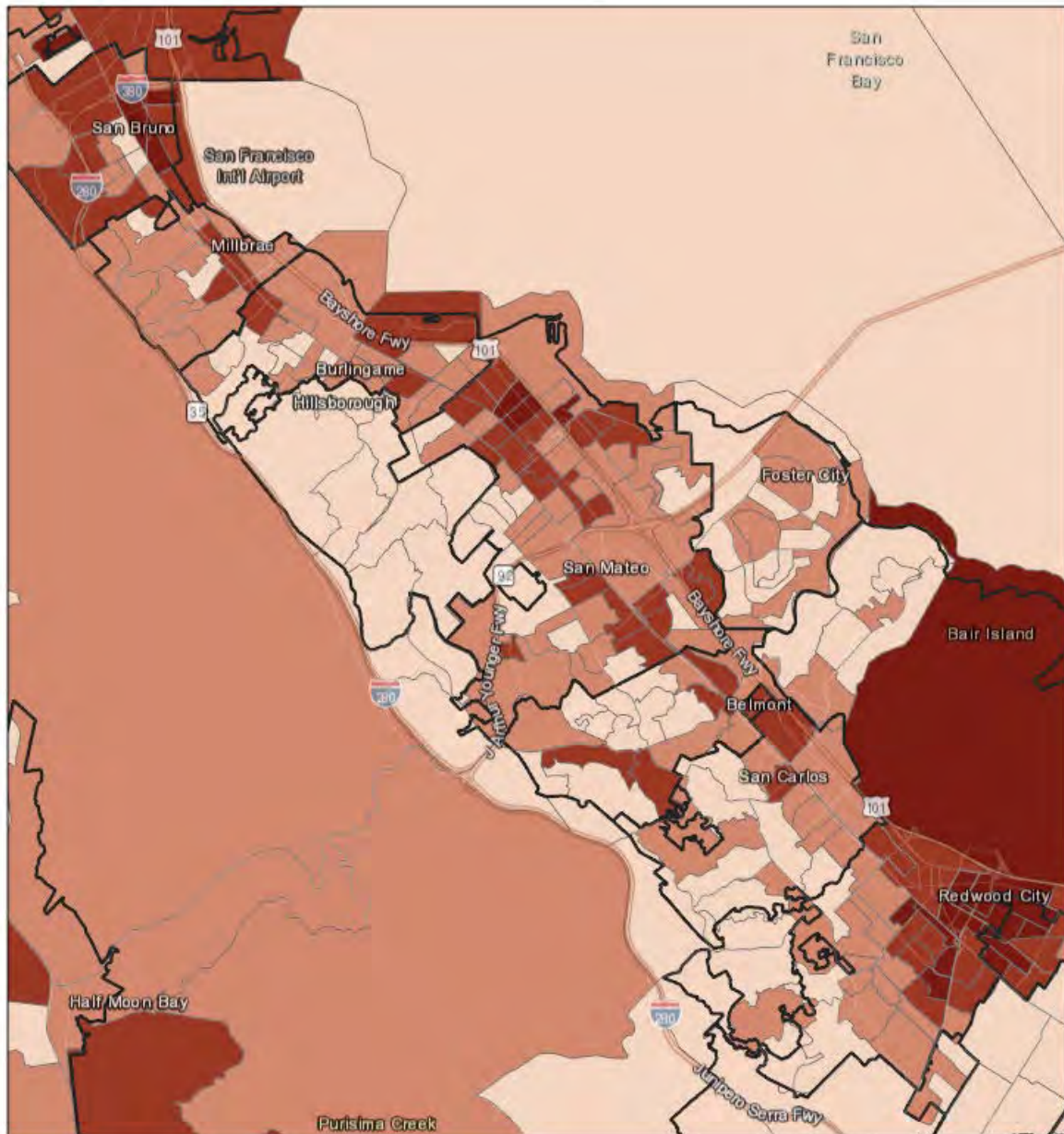


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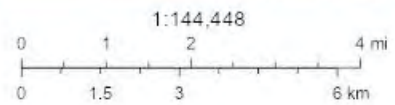
Source: California Department of Housing and Community Development AFFH Data Viewer

Figure II-27.
Low to Moderate Income Population by Block Group



10/4/2021, 2:58:33 PM

City/Town Boundaries
 (A) Low to Moderate Income Population (HUD) - Block Group
 < 25%
 25% - 50%
 50% - 75%
 75% - 100%



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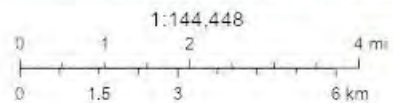
Source: California Department of Housing and Community Development AFFH Data Viewer

Figure II-28.
Poverty Status by Census Tract, 2019



9/28/2021, 10:54:10 AM

-  City/Town Boundaries
- (R) Poverty Status (ACS, 2015 - 2019) - Tract
-  < 10%
-  10% - 20%
-  20% - 30%

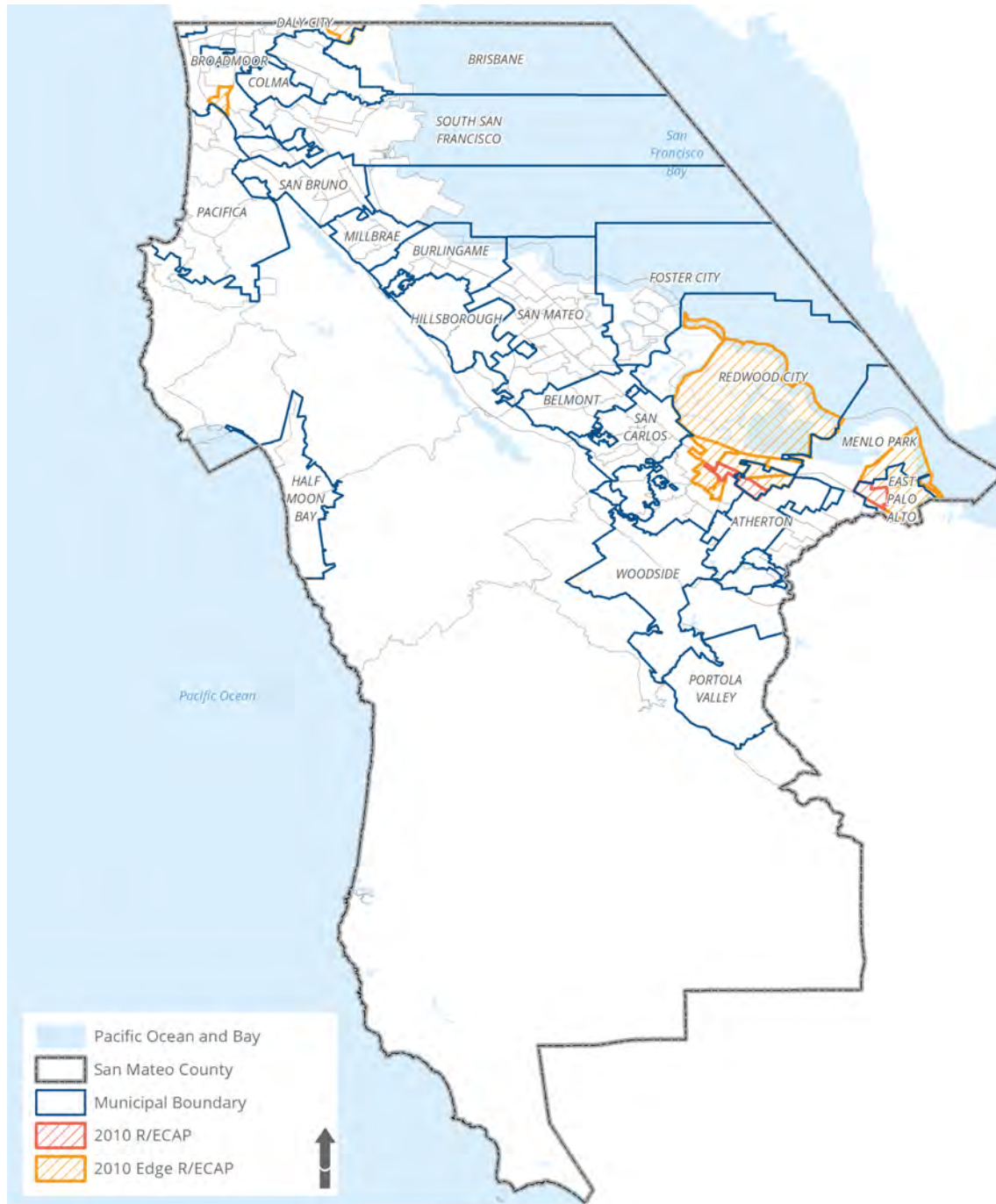


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Source: California Department of Housing and Community Development AFFH Data Viewer

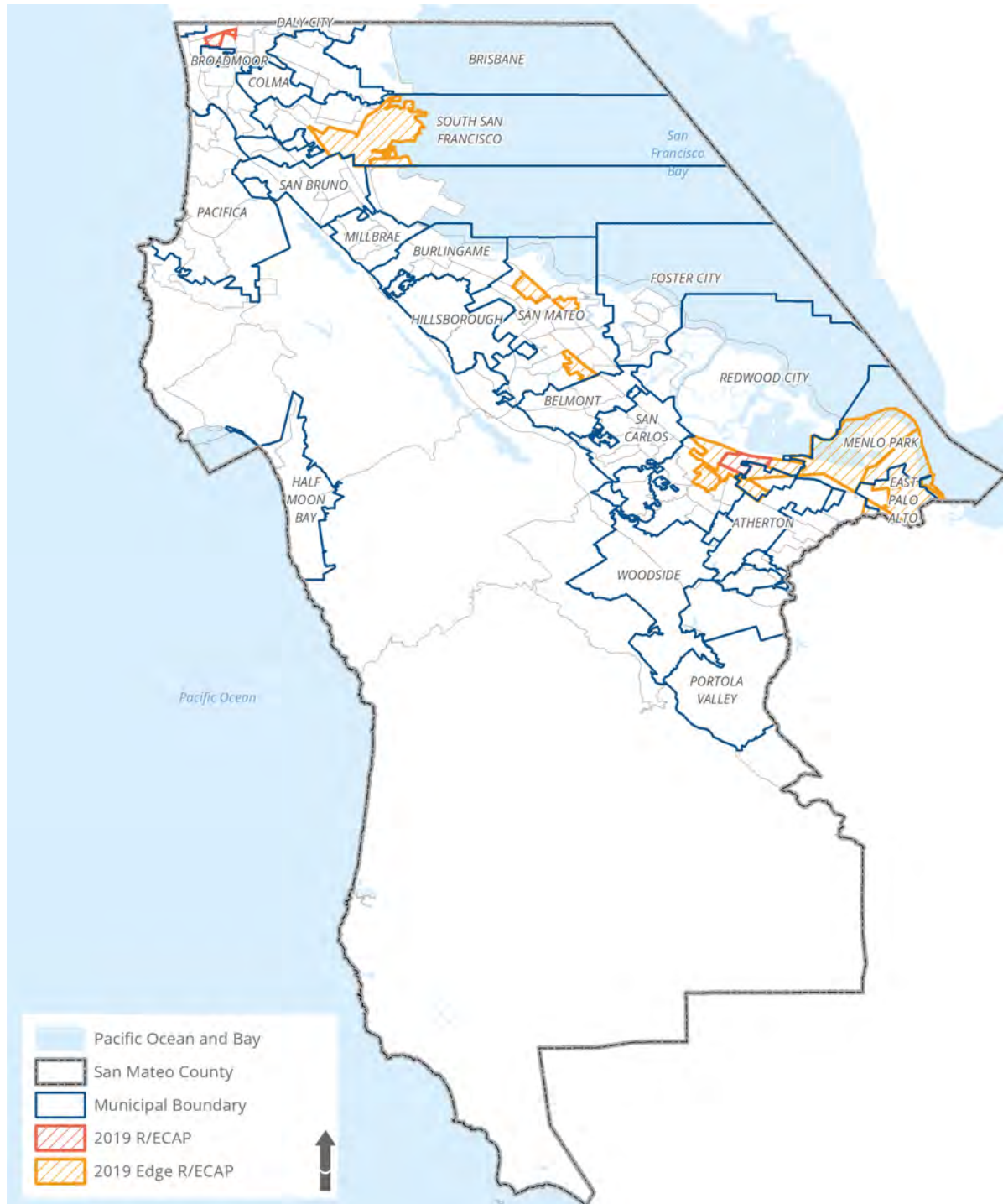
Figure II-29.
R/ECAPs and Edge R/ECAPs, 2010



Note: R/ECAPs are census tracts that have a non-white population of 50 percent or more (majority-minority) AND the poverty rate is three times the average tract poverty rate for the County (19.4% in 2010). Edge R/ECAPs are census tracts that have a non-white population of 50 percent or more (majority-minority) AND the poverty rate is two times the average tract poverty rate for the County (13% in 2010).

Source: California Department of Housing and Community Development AFFH Data Viewer

**Figure II-30.
R/ECAPs and Edge R/ECAPs, 2019**



Note: R/ECAPs are census tracts that have a non-white population of 50 percent or more (majority-minority) AND the poverty rate is three times the average tract poverty rate for the County (19.1% in 2010). Edge R/ECAPs are census tracts that have a non-white population of 50 percent or more (majority-minority) AND the poverty rate is two times the average tract poverty rate for the County (12.8% in 2019).

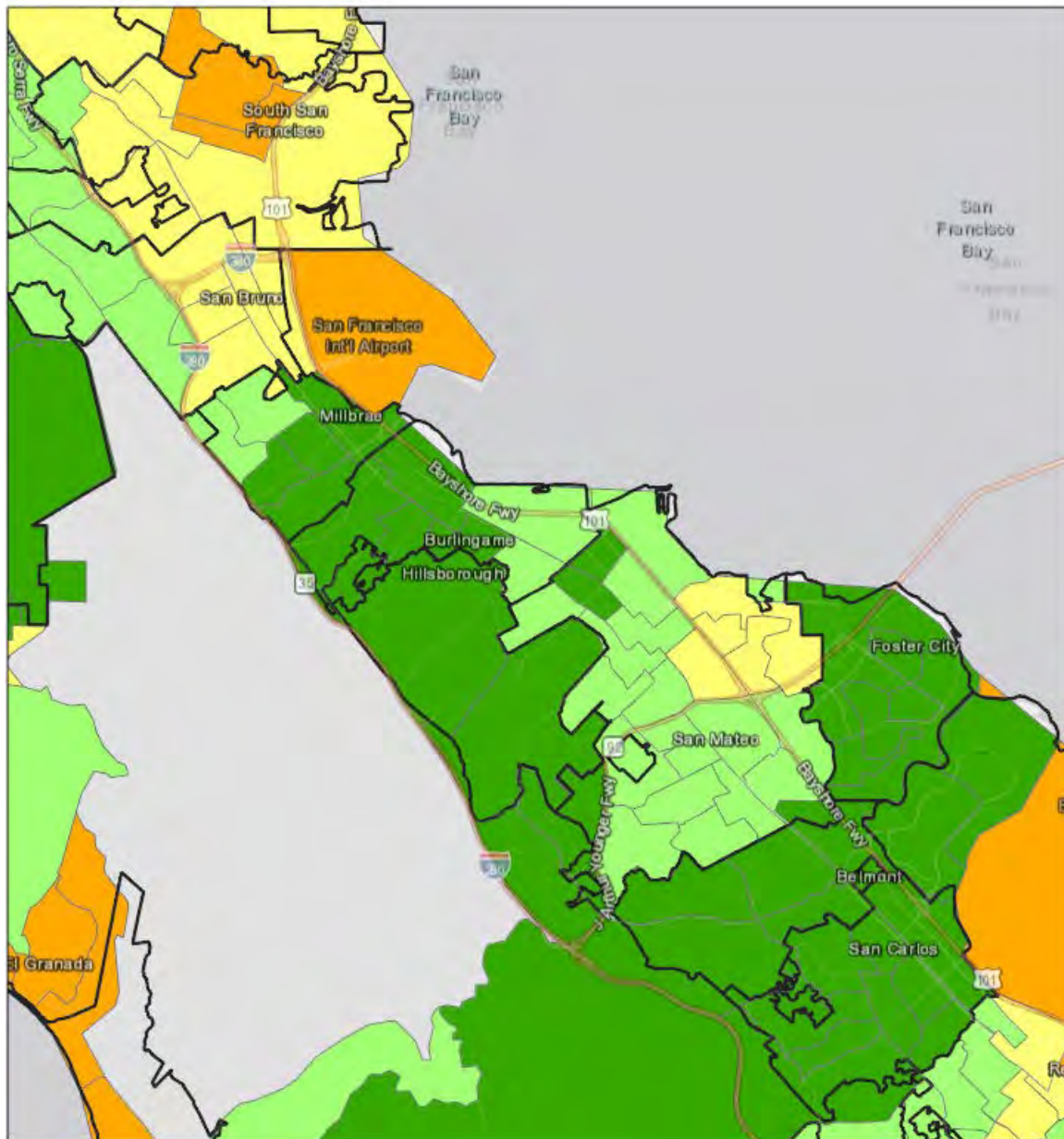
Source: California Department of Housing and Community Development AFFH Data Viewer

SECTION III. Access to Opportunity

Education

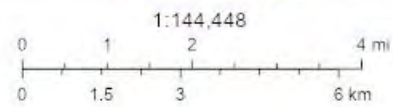
Appendix item: Access to education supplement—findings from a countywide analysis of access to education and educational outcomes by protected class.

Figure III-1.
TCAC Opportunity Areas Education Score by Census Tract, 2021



9/28/2021, 11:01:52 AM

- City/Town Boundaries
- (R) TCAC Opportunity Areas (2021) - Education Score -Tract
- < 0.25 (Less Positive Education Outcomes)
- 0.25 - 0.50
- 0.50 - 0.75
- > 0.75 (More Positive Education Outcomes)
- No Data

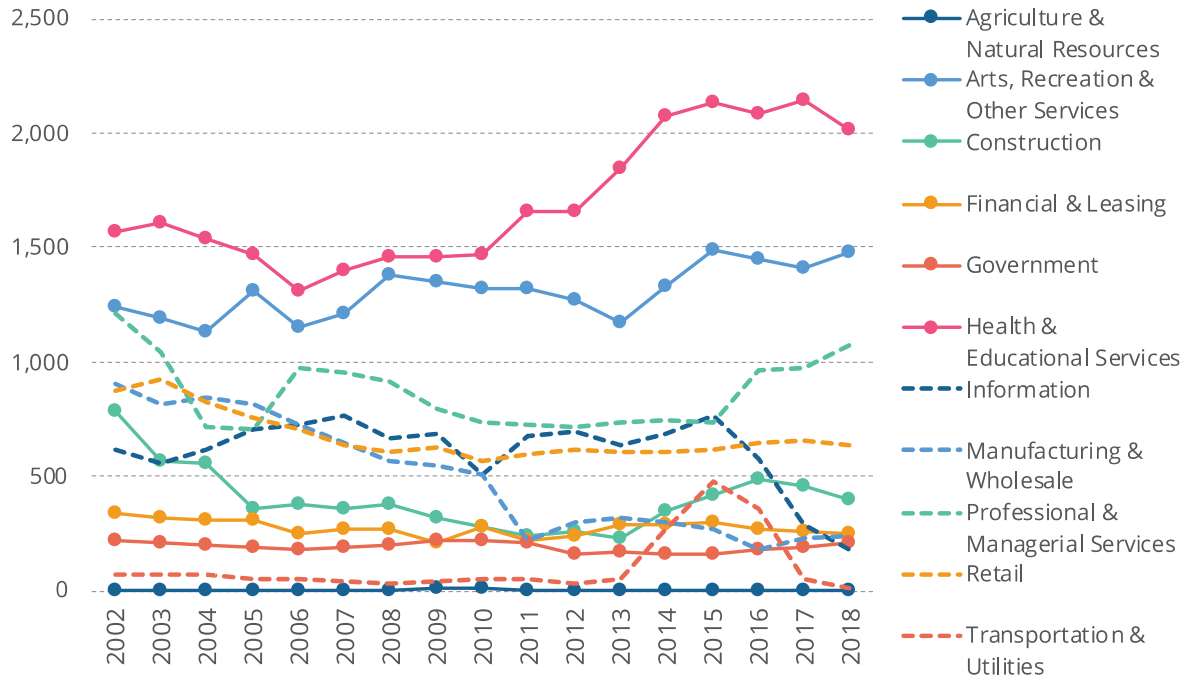


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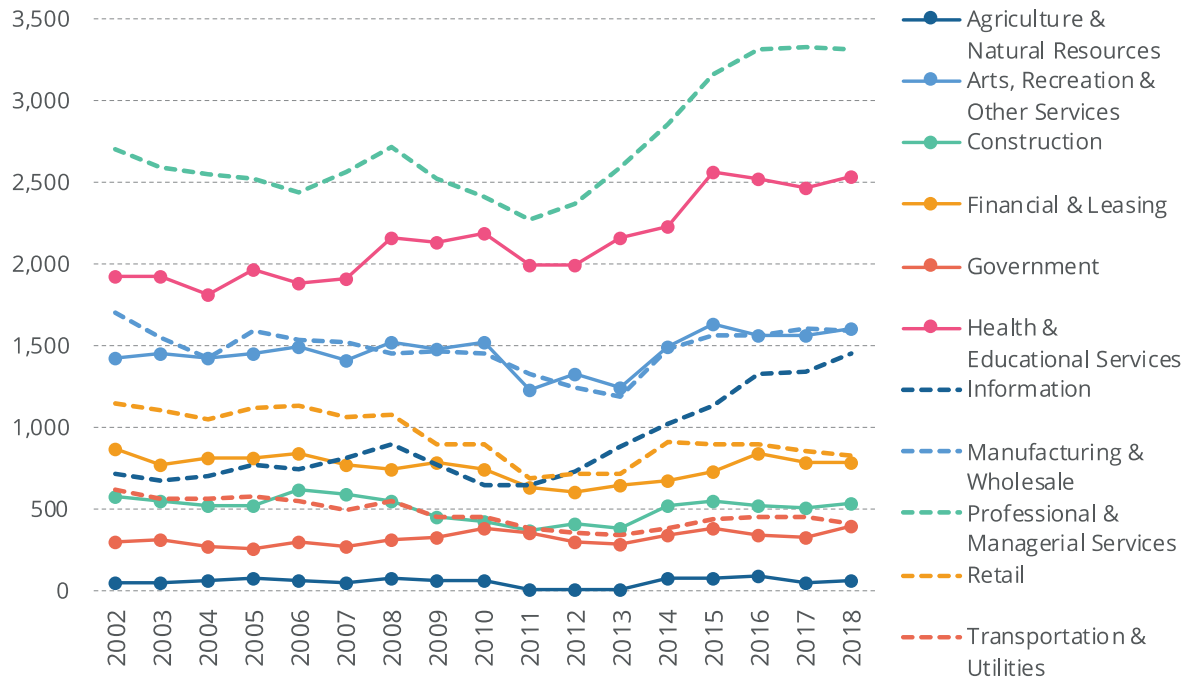
Source: California Department of Housing and Community Development AFFH Data Viewer

Employment
Figure III-2.
Jobs by Industry, Belmont, 2002-2018



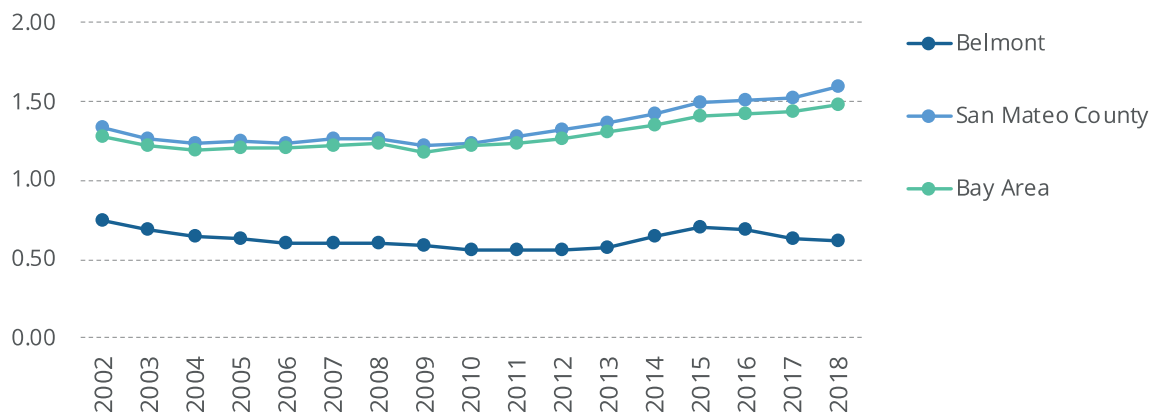
Source: ABAG Housing Needs Data Workbook

Figure III-3.
Job Holders by Industry, Belmont, 2002-2018



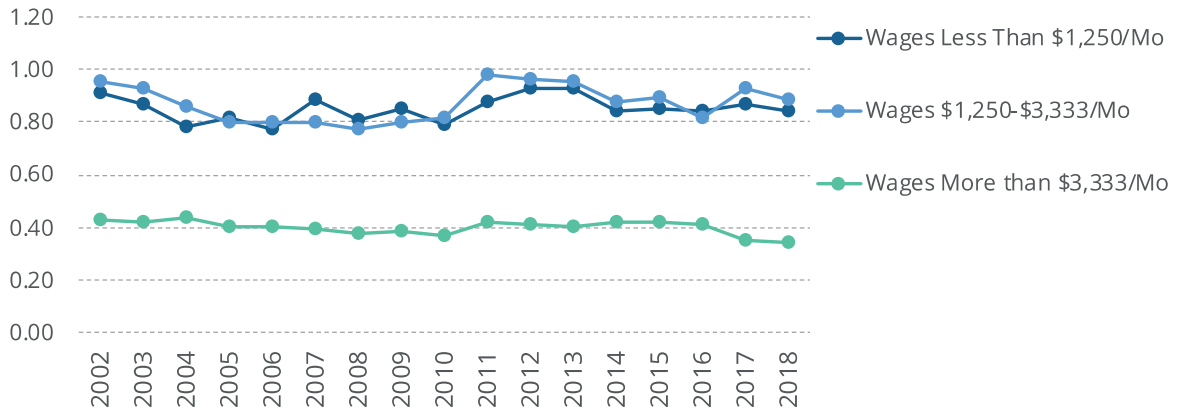
Source: ABAG Housing Needs Data Workbook

Figure III-4.
Jobs to Household Ratio, Belmont, 2002-2018



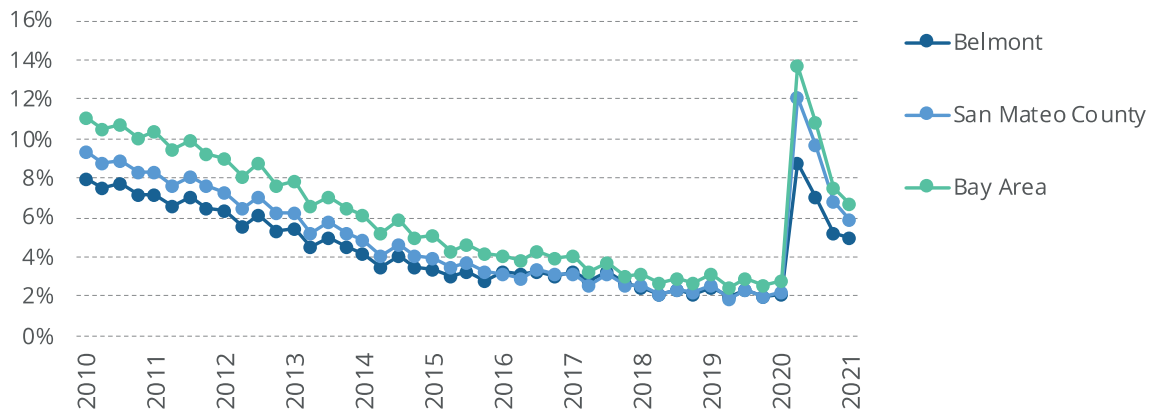
Source: ABAG Housing Needs Data Workbook

Figure III-5.
Jobs to Worker Ratio by Wage, Belmont, 2002-2018



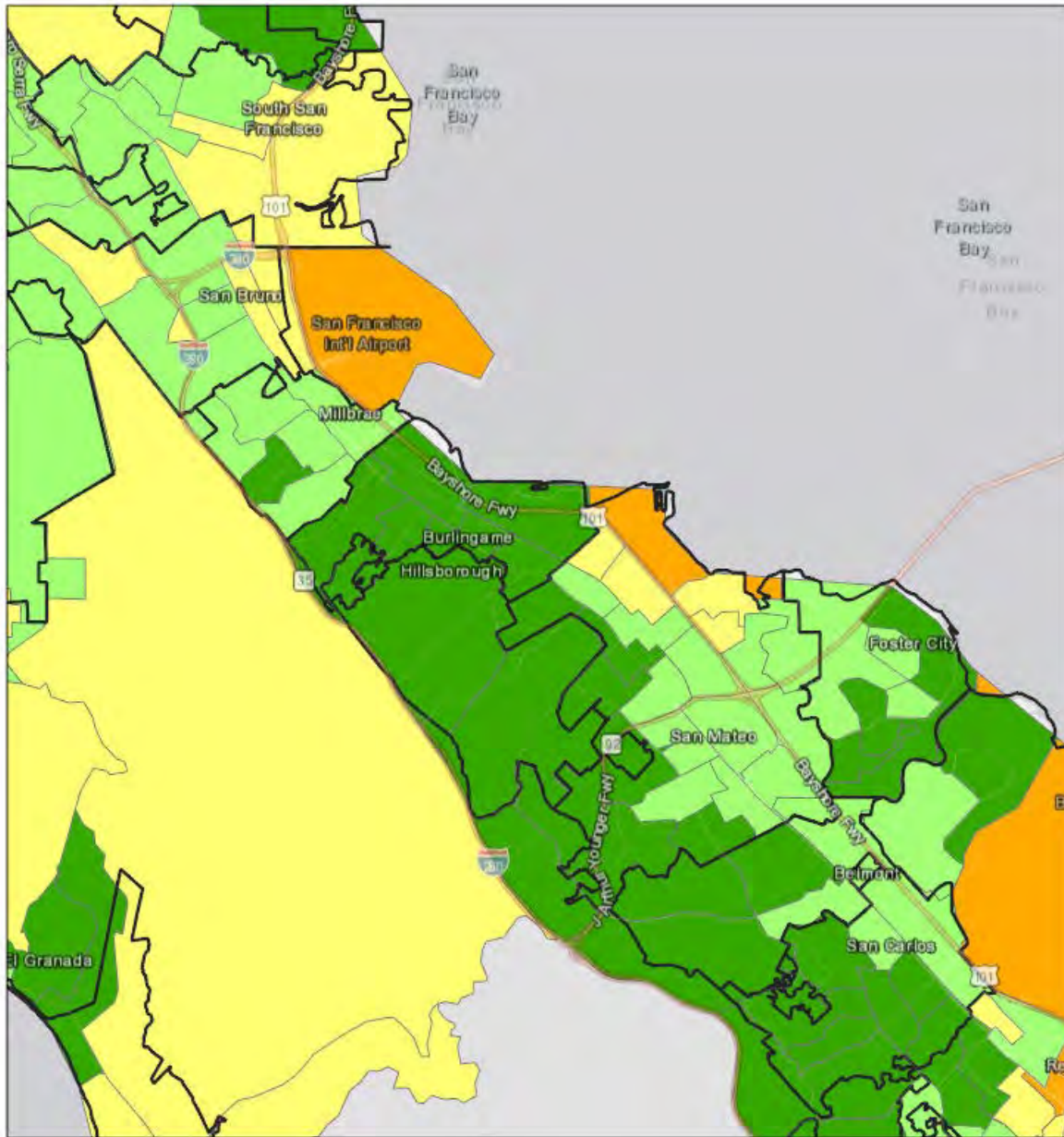
Source: ABAG Housing Needs Data Workbook

Figure III-6.
Unemployment Rate, 2010-2021



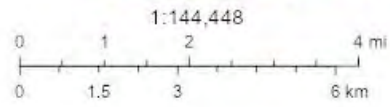
Source: ABAG Housing Needs Data Workbook

Figure III-7.
TCAC Opportunity Areas Economic Score by Census Tract, 2021



9/28/2021, 11:01:11 AM

- City/Town Boundaries
- (R) TCAC Opportunity Areas (2021) - Economic Score - Tract
- < 0.25 (Less Positive Economic Outcome)
- 0.25 - 0.50
- 0.50 - 0.75
- > 0.75 (More Positive Economic Outcome)
- No Data

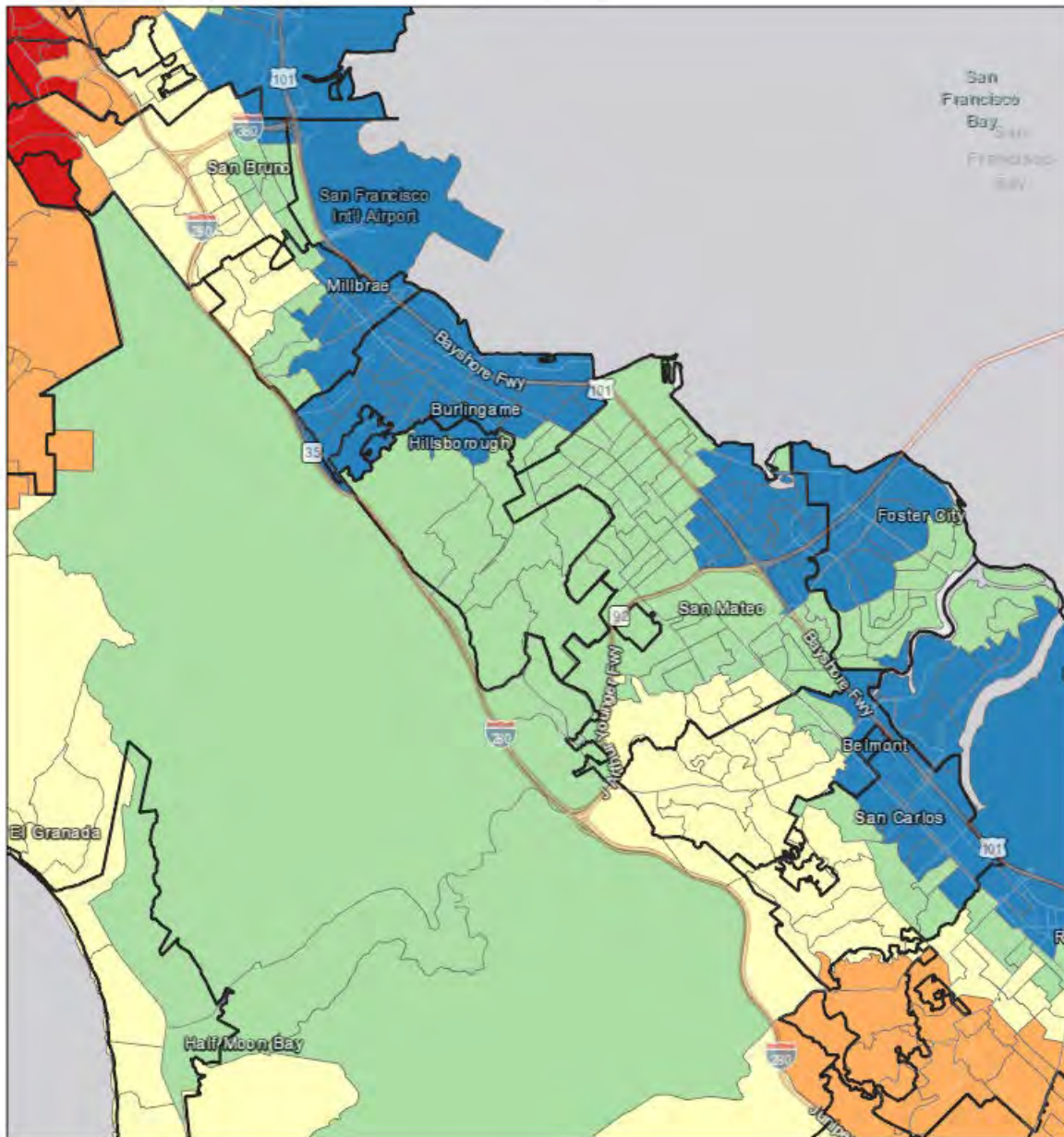


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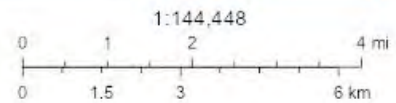
Source: California Department of Housing and Community Development AFFH Data Viewer

Figure III-8.
Jobs Proximity Index by Block Group, 2017



9/30/2021, 10:54:44 AM

- City/Town Boundaries
- (A) Jobs Proximity Index (HUD, 2014 - 2017) - Block Group
- < 20 (Furthest Proximity)
- 20 - 40
- 40 - 60
- 60 - 80
- > 80 (Closest Proximity)

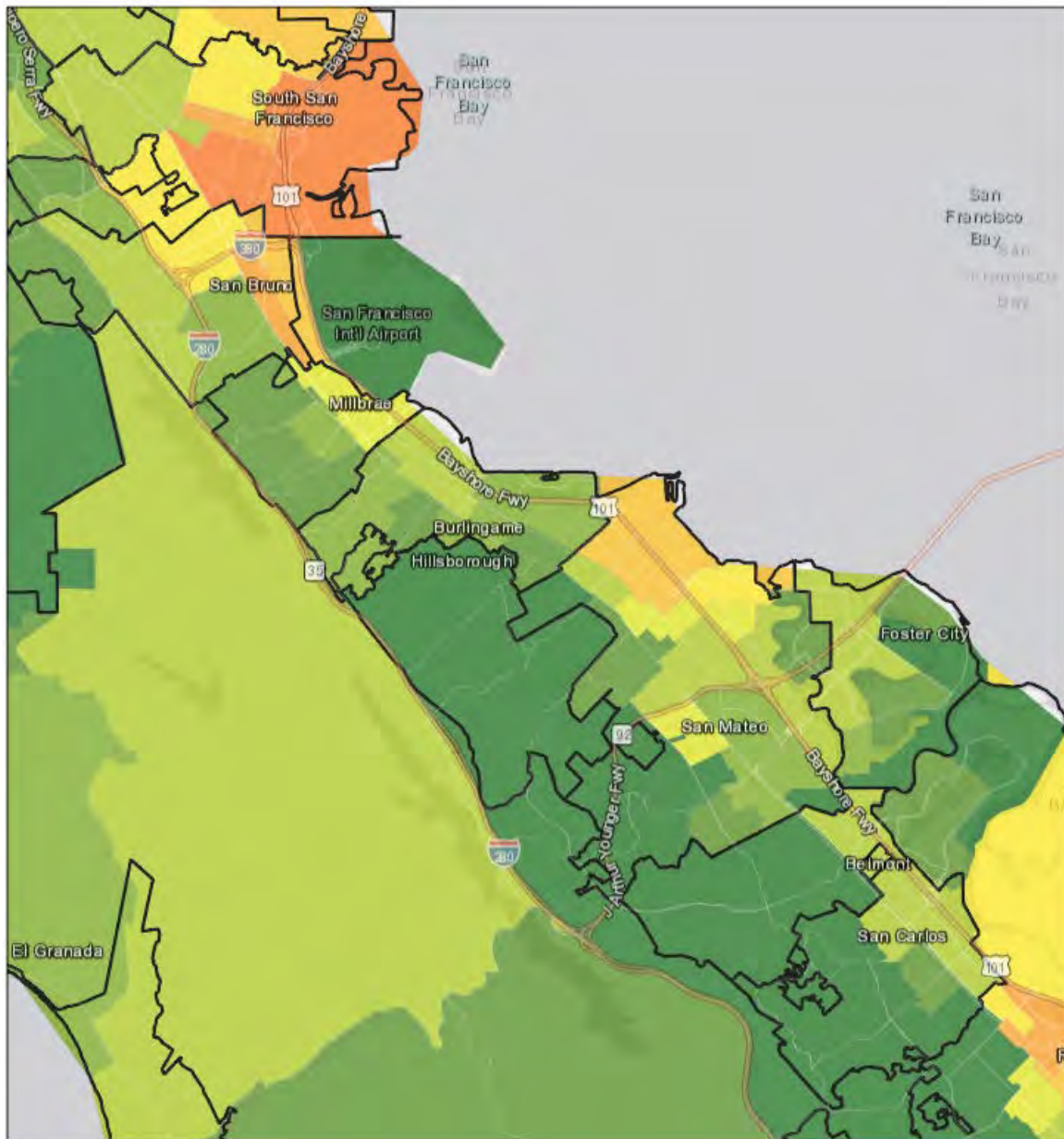


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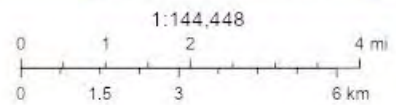
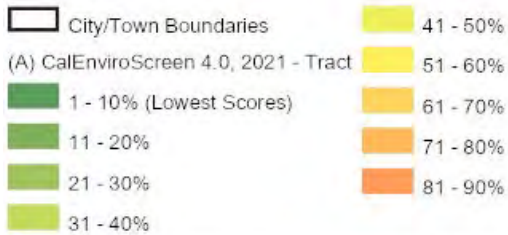
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Source: California Department of Housing and Community Development AFFH Data Viewer

Figure III-10.
CalEnviroScreen by Census Tract, 2021



10/4/2021, 3:05:28 PM

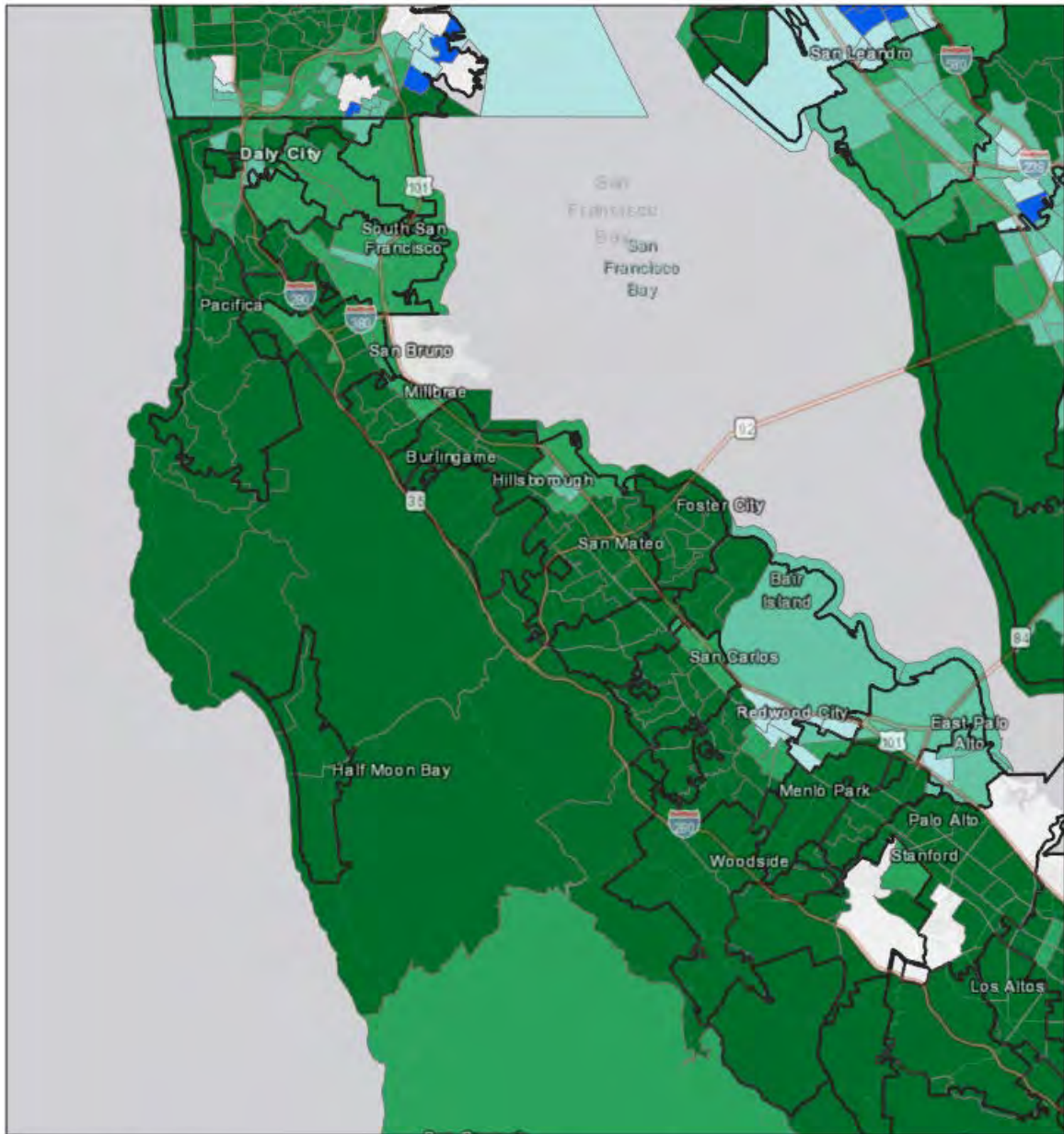


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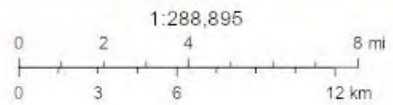
Source: California Department of Housing and Community Development AFFH Data Viewer

Figure III-11.
Healthy Places Index by Census Tract, 2021



10/4/2021, 3:07:40 PM

-  City/Town Boundaries
- (A) Healthy Places Index (PHASC, 2021) - Tract
-  < 20%
-  20% - 40%
-  40% - 60%
-  60% - 80%
-  80% - 100%



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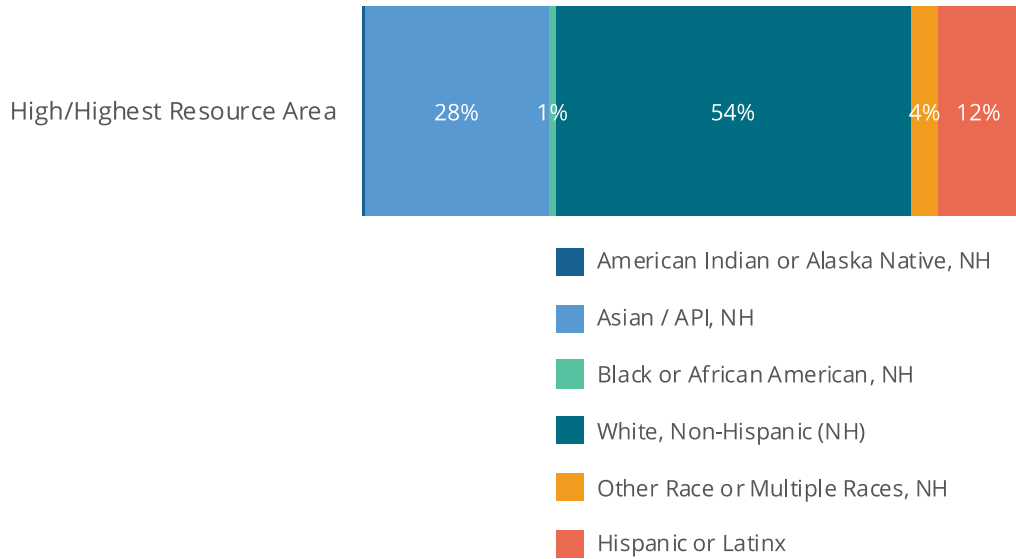
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Source: California Department of Housing and Community Development AFFH Data Viewer

Patterns in disparities in access to opportunity.

Figure III-12.

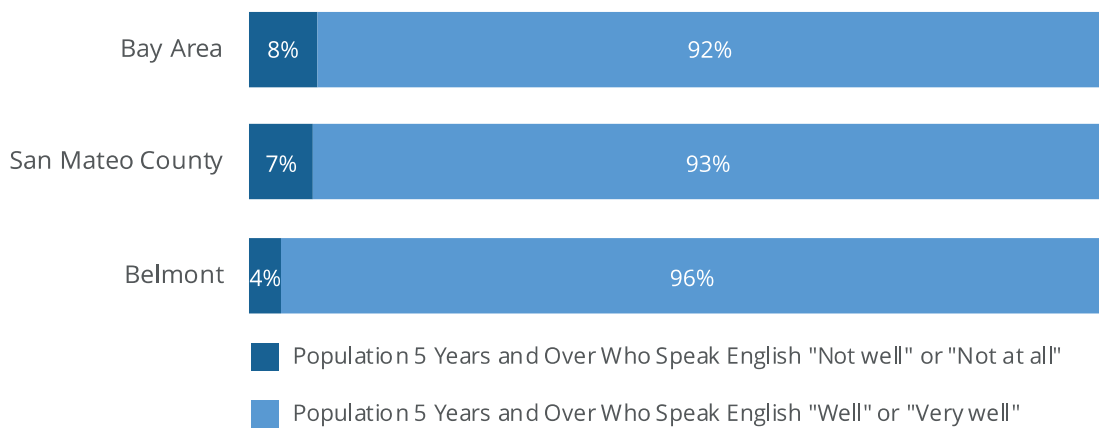
Population Living in Moderate and High Resource Areas by Race and Ethnicity, Belmont, 2019



Source: ABAG Housing Needs Data Workbook

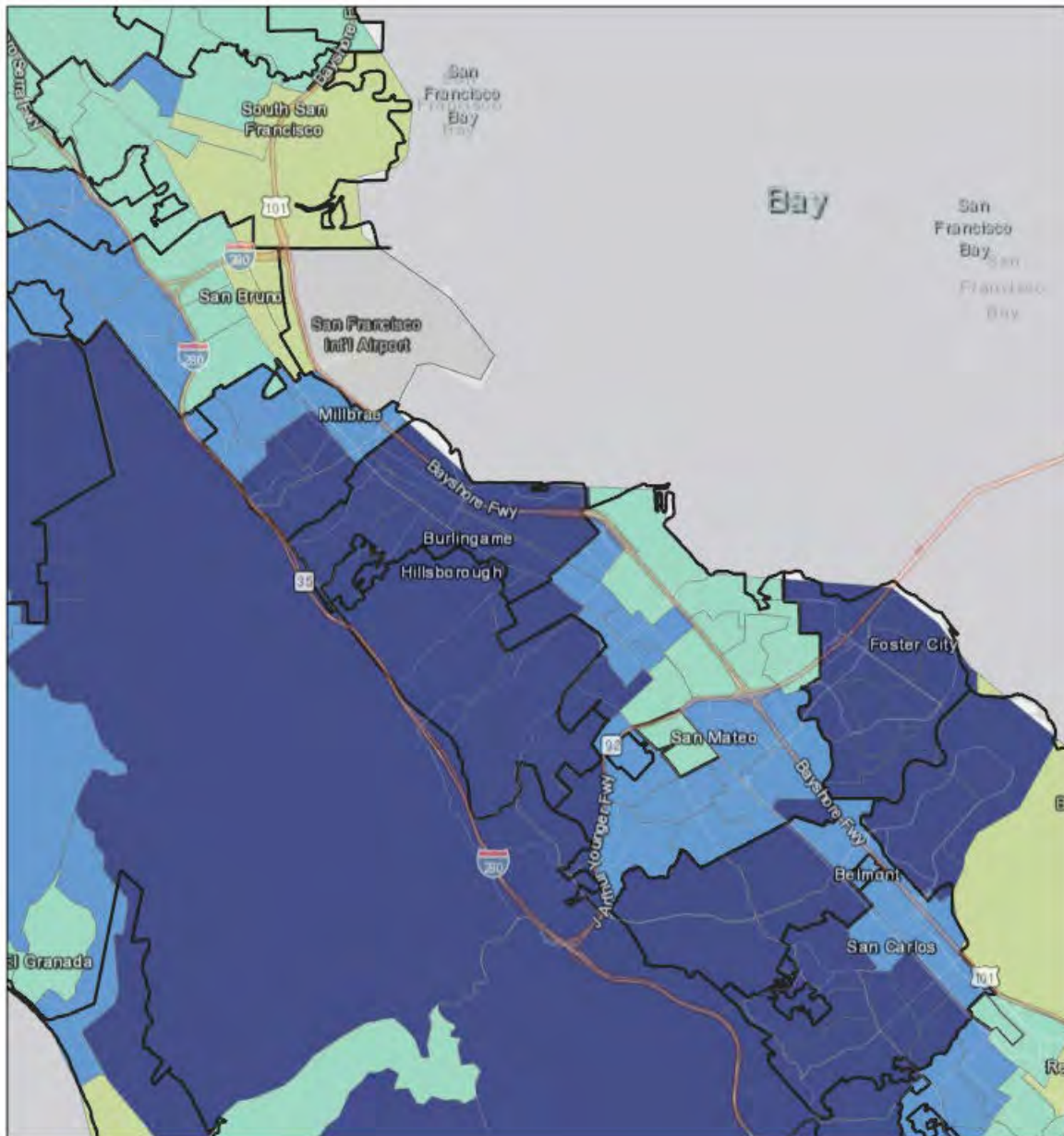
Figure III-13.

Population with Limited English Proficiency, Belmont, 2019



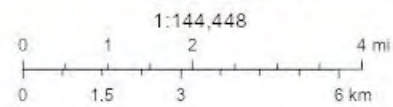
Source: ABAG Housing Needs Data Workbook

Figure III-14.
TCAC Opportunity Areas Composite Score by Census Tract, 2021



9/28/2021, 10:59:54 AM

- City/Town Boundaries
- (R) TCAC Opportunity Areas (2021) - Composite Score - Tract
- Highest Resource
- High Resource
- Moderate Resource (Rapidly Changing)
- Moderate Resource
- Low Resource

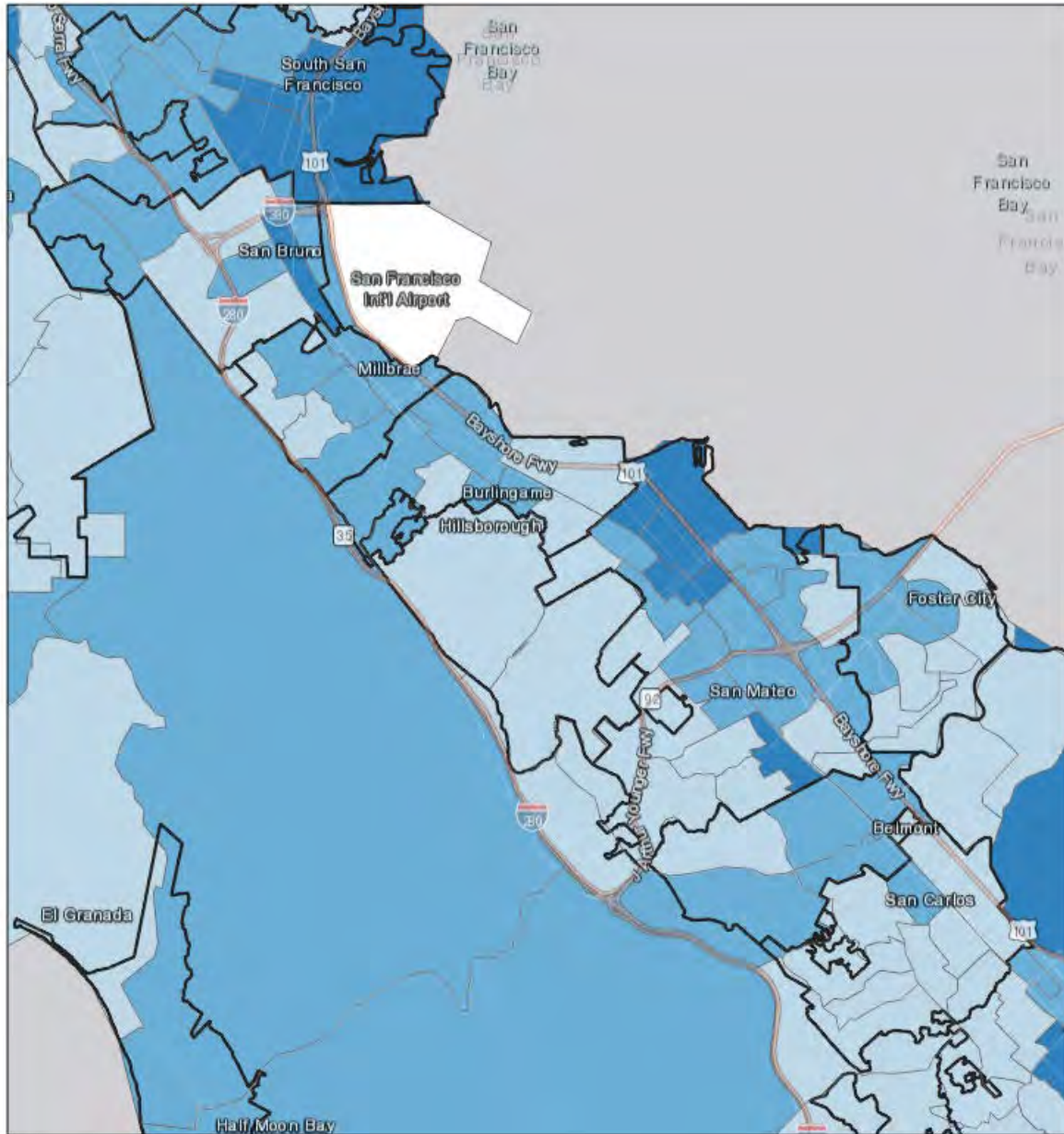


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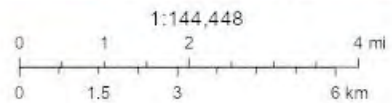
Source: California Department of Housing and Community Development AFFH Data Viewer

Figure III-15.
Social Vulnerability Index by Census Tract, 2018



10/4/2021, 3:03:11 PM

City/Town Boundaries
 (A) Social Vulnerability Index (CDC, 2018) - Tract
 No Data
 Lower Vulnerability
 Higher Vulnerability

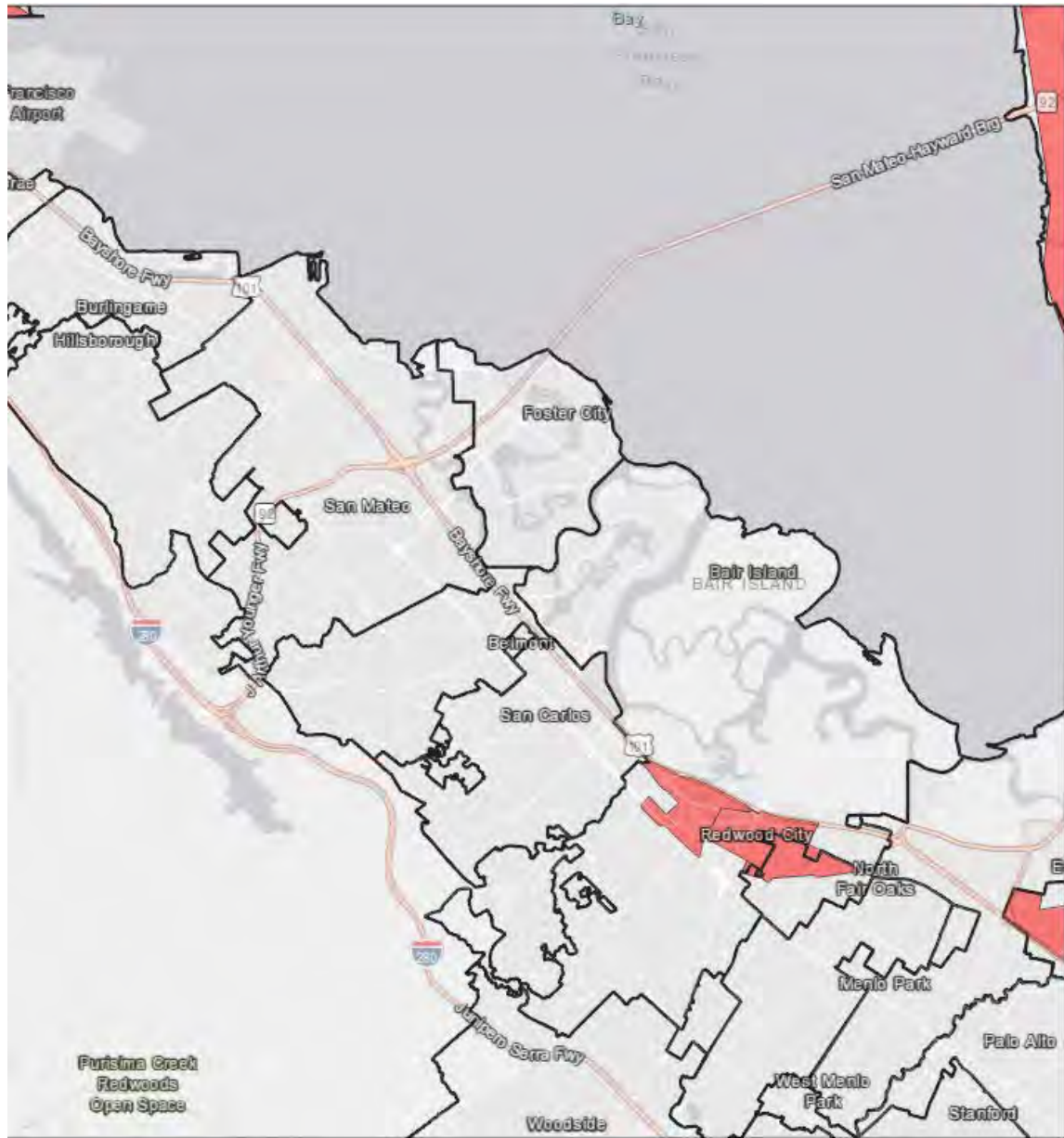


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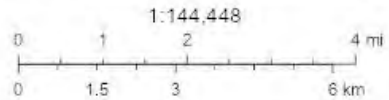
Source: California Department of Housing and Community Development AFFH Data Viewer

Figure III-16.
SB 535 Disadvantaged Communities



12/9/2021, 12:38:26 PM

-  City/Town Boundaries
-  (A) SB 535 Disadvantaged Communities

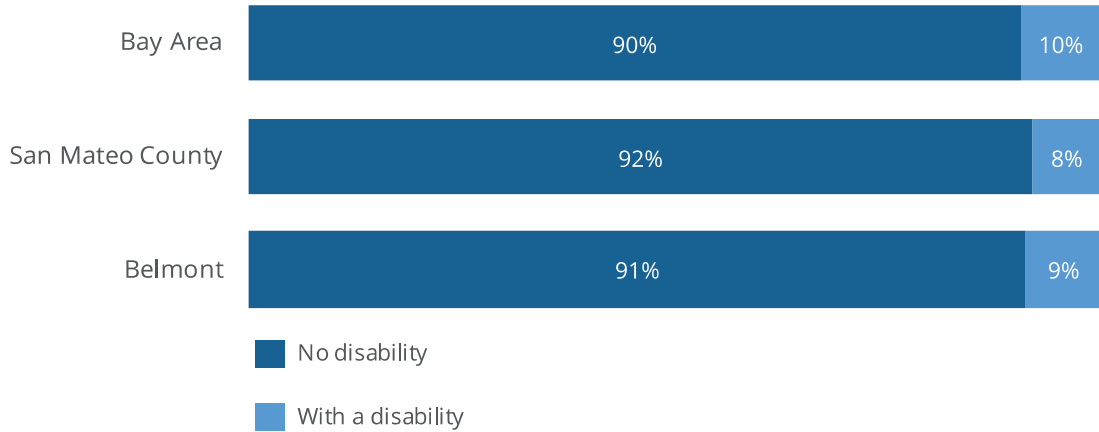


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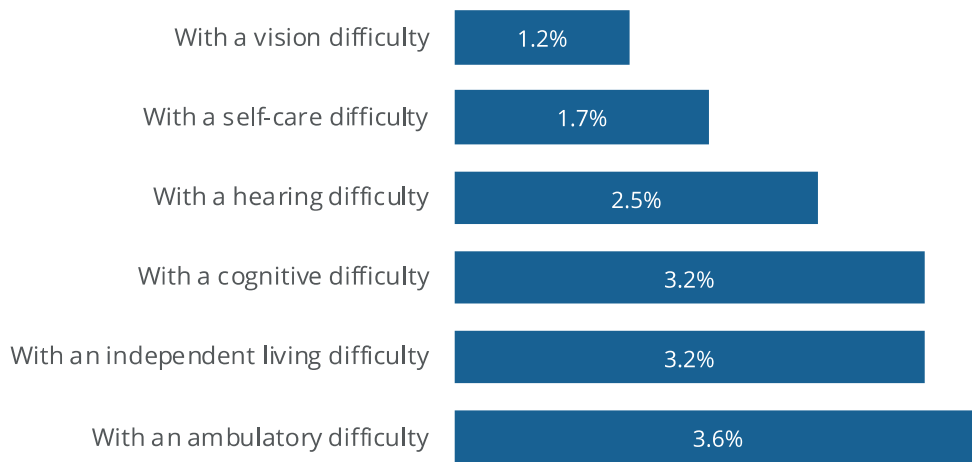
Source: California Department of Housing and Community Development AFFH Data Viewer

Disparities in access to opportunity for persons with disabilities.
Figure III-17.
Population by Disability Status, Belmont, 2019



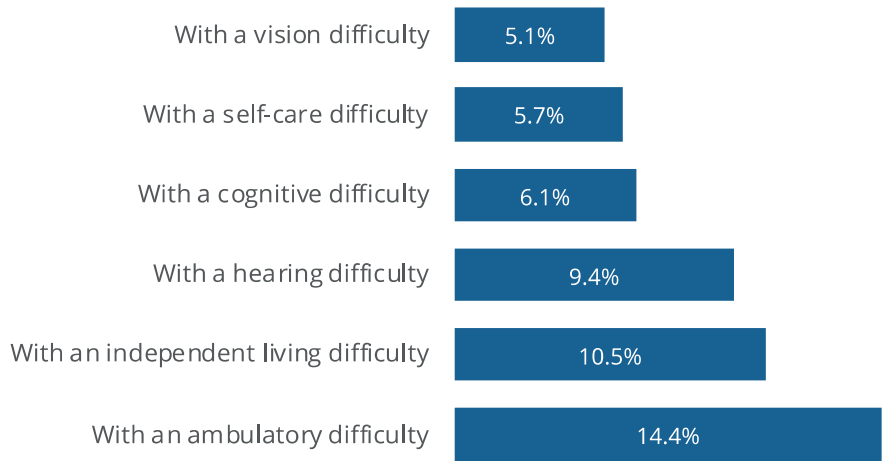
Source: ABAG Housing Needs Data Workbook

Figure III-18.
Disability by Type for the Non-Institutionalized Population 18 Years and Over, Belmont, 2019



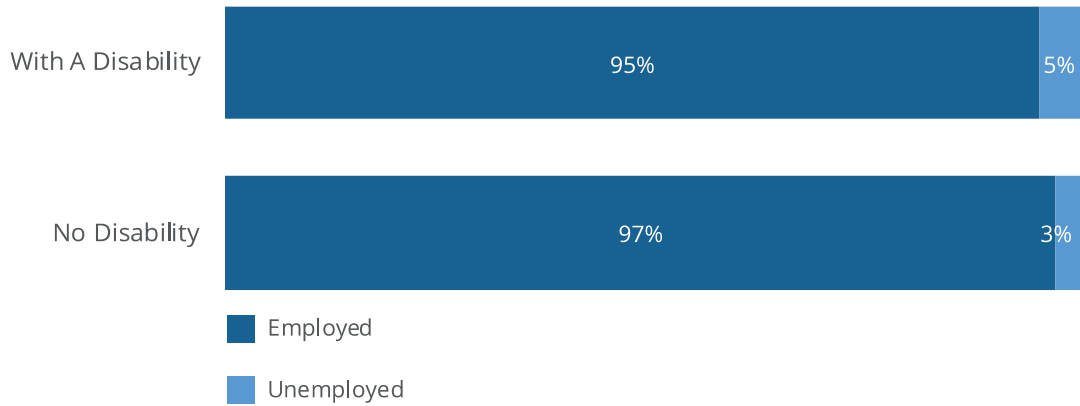
Source: ABAG Housing Needs Data Workbook

Figure III-19.
Disability by Type for Seniors (65 years and over), Belmont, 2019



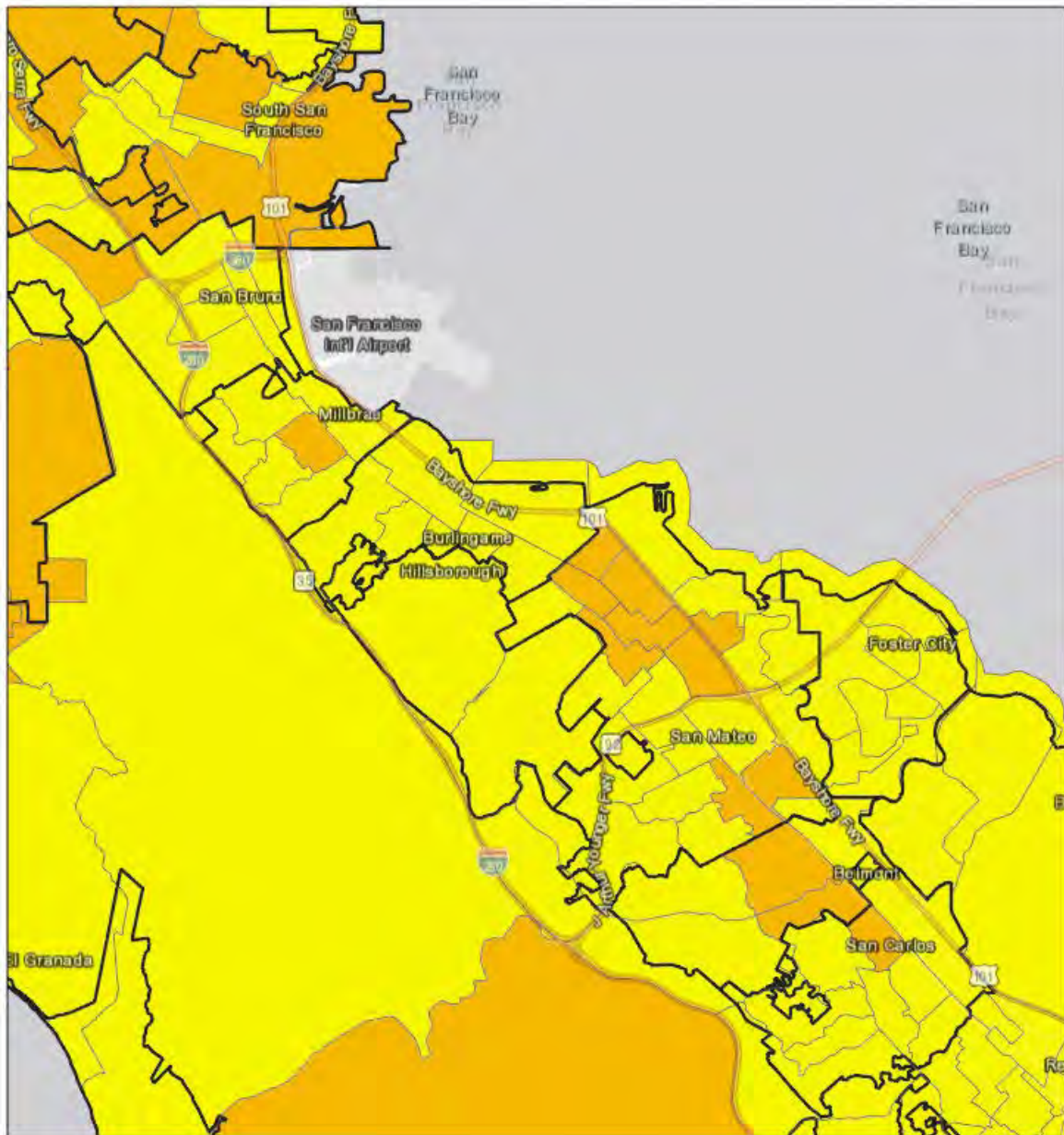
Source: ABAG Housing Needs Data Workbook

Figure III-20.
Employment by Disability Status, Belmont, 2019



Source: ABAG Housing Needs Data Workbook

Figure III-21.
Share of Population with a Disability by Census Tract, 2019

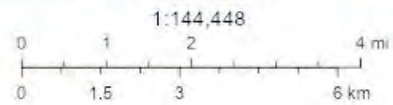


9/28/2021, 10:53:13 AM

City/Town Boundaries

(R) Population with a Disability (ACS, 2015 - 2019) - Tract

- < 10%
- 10% - 20%



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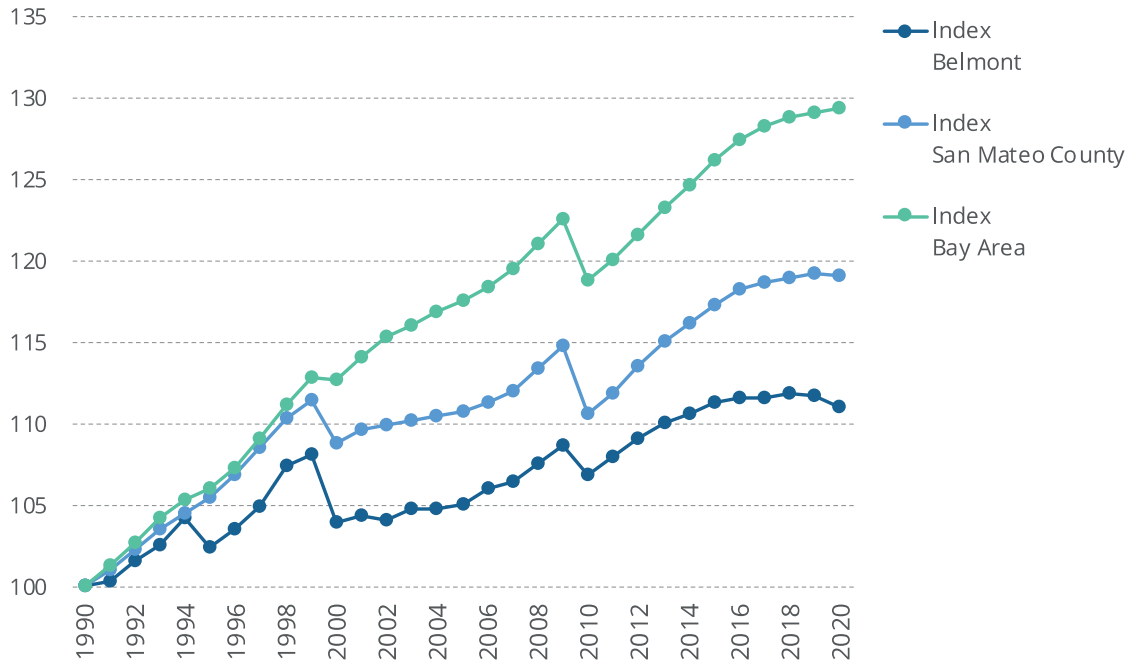
Source: California Department of Housing and Community Development AFFH Data Viewer

SECTION IV. Disproportionate Housing Needs

Housing needs.

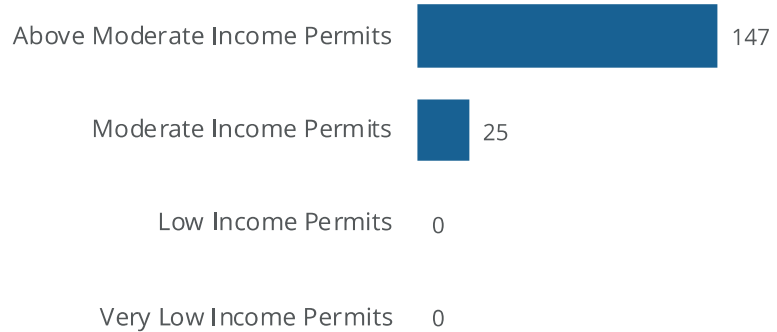
Figure IV-1.

Population Indexed to 1990



Source: ABAG Housing Needs Data Workbook

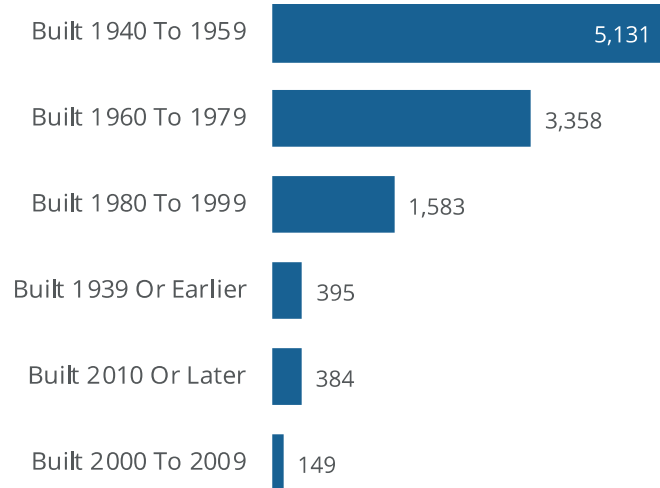
Figure IV-2.
Housing Permits Issued by Income Group, Belmont, 2015-2019



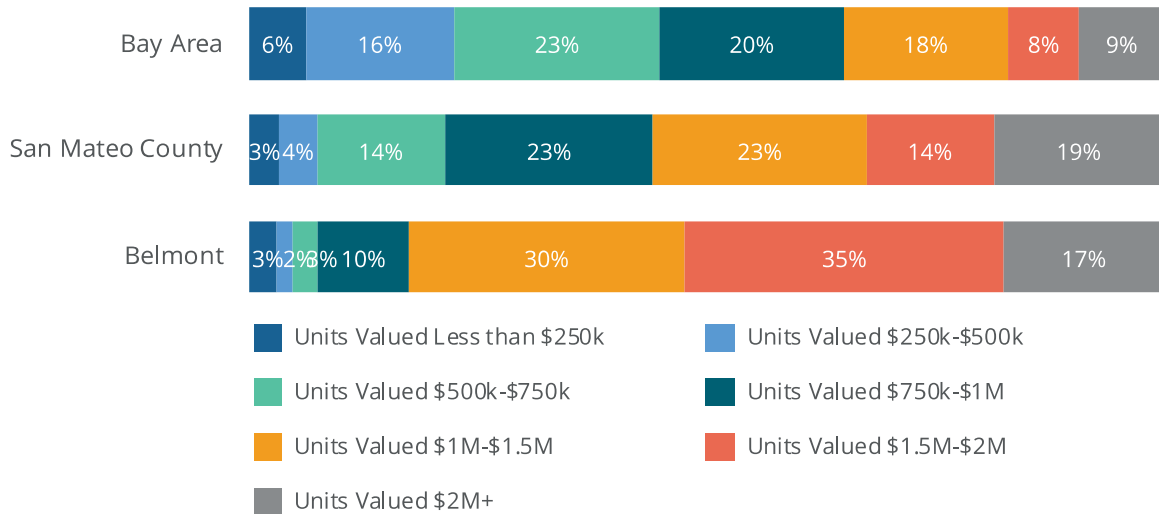
Source:
ABAG Housing Needs Data
Workbook

**Figure IV-3.
Housing Units by Year
Built, Belmont**

Source:
ABAG Housing Needs Data Workbook

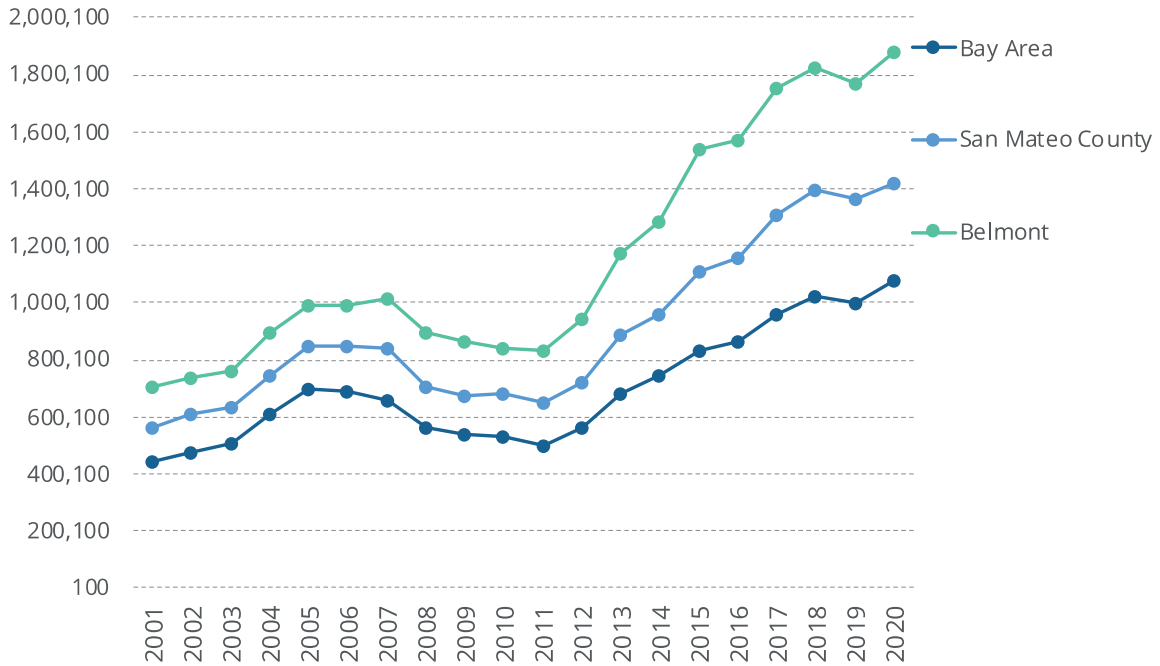


**Figure IV-4.
Distribution of Home Value for Owner Occupied Units, 2019**



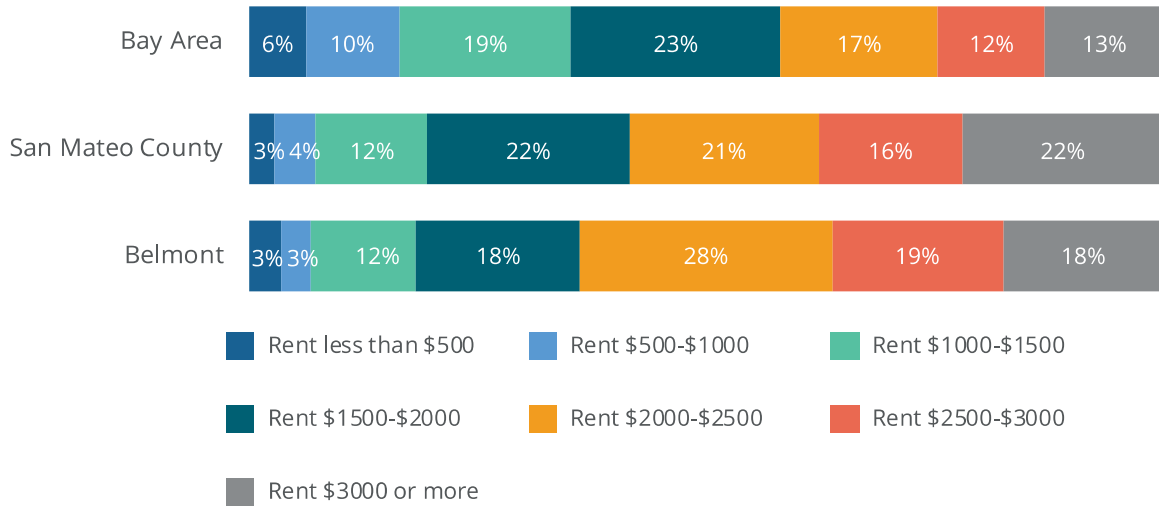
Source: ABAG Housing Needs Data Workbook

Figure IV-5.
Zillow Home Value Index, 2001-2020



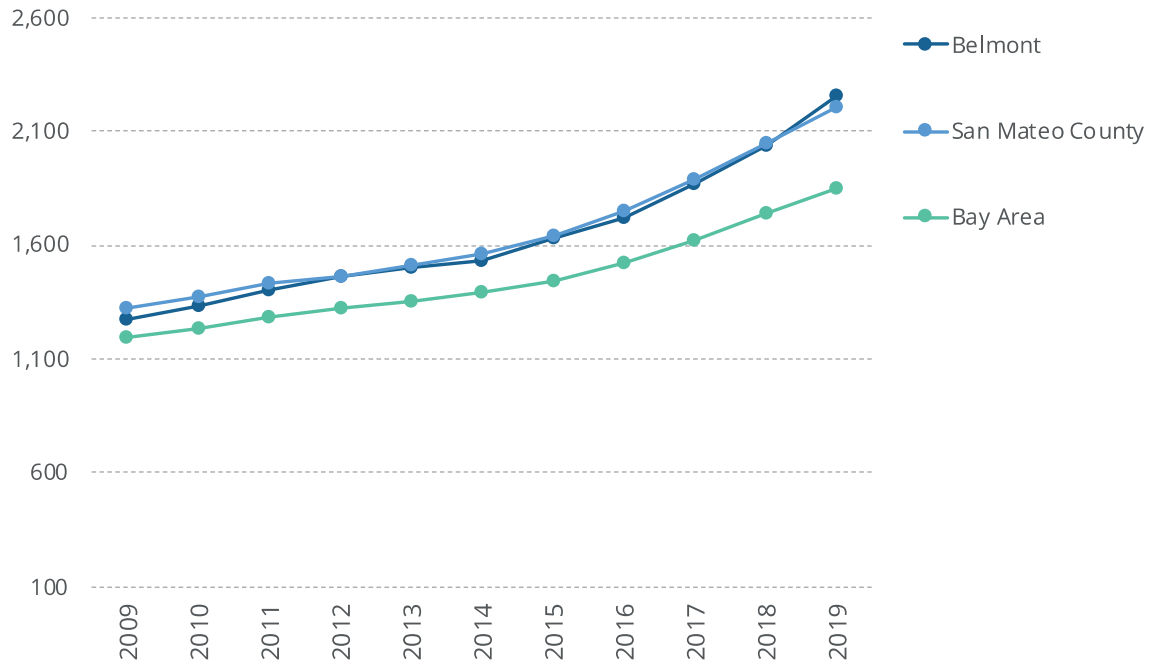
Source: ABAG Housing Needs Data Workbook

Figure IV-6.
Distribution of Contract Rents for Renter Occupied Units, 2019



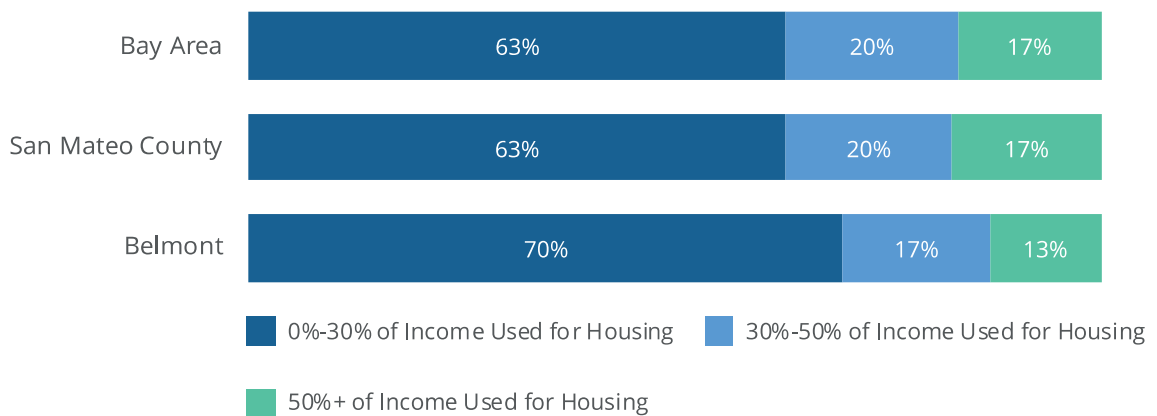
Source: ABAG Housing Needs Data Workbook

**Figure IV-7.
Median Contract Rent, 2009-2019**



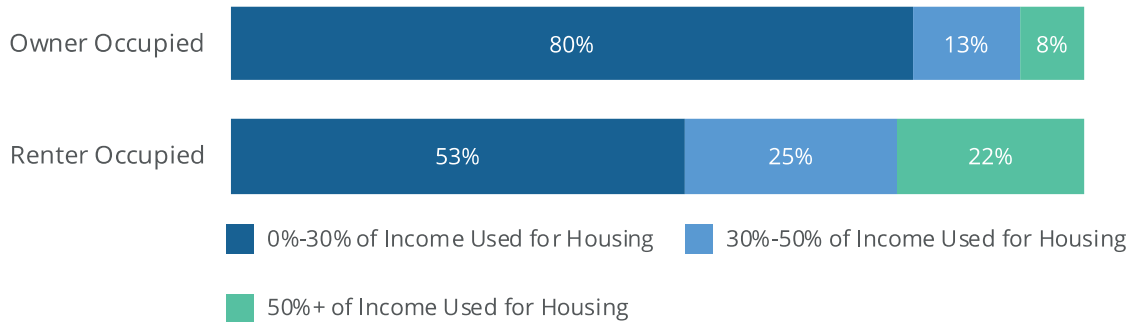
Source: ABAG Housing Needs Data Workbook

**Cost burden and severe cost burden.
Figure IV-8.
Overpayment (Cost Burden) by Jurisdiction, 2019**



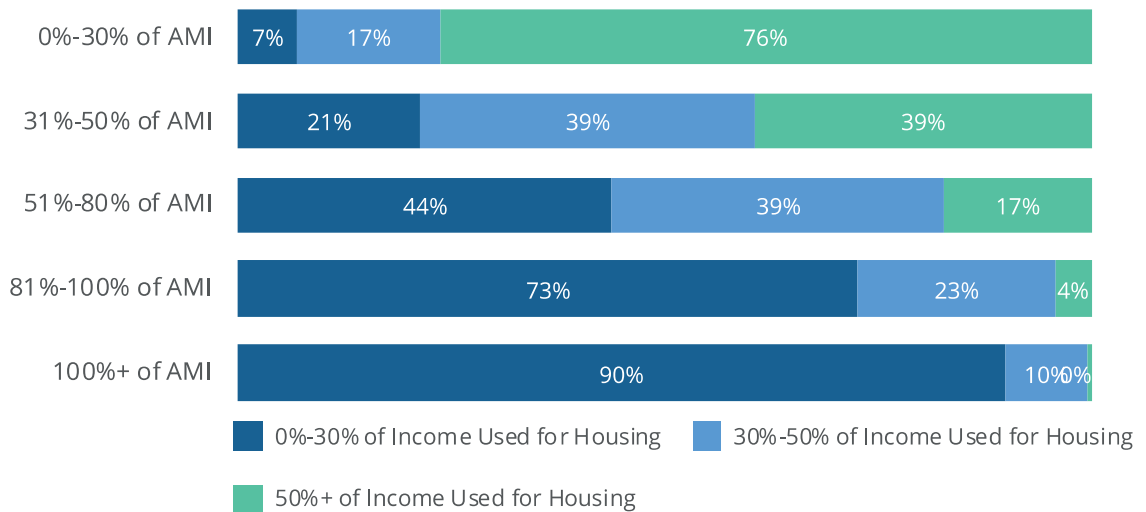
Source: ABAG Housing Needs Data Workbook

Figure IV-9.
Overpayment (Cost Burden) by Tenure, Belmont, 2019



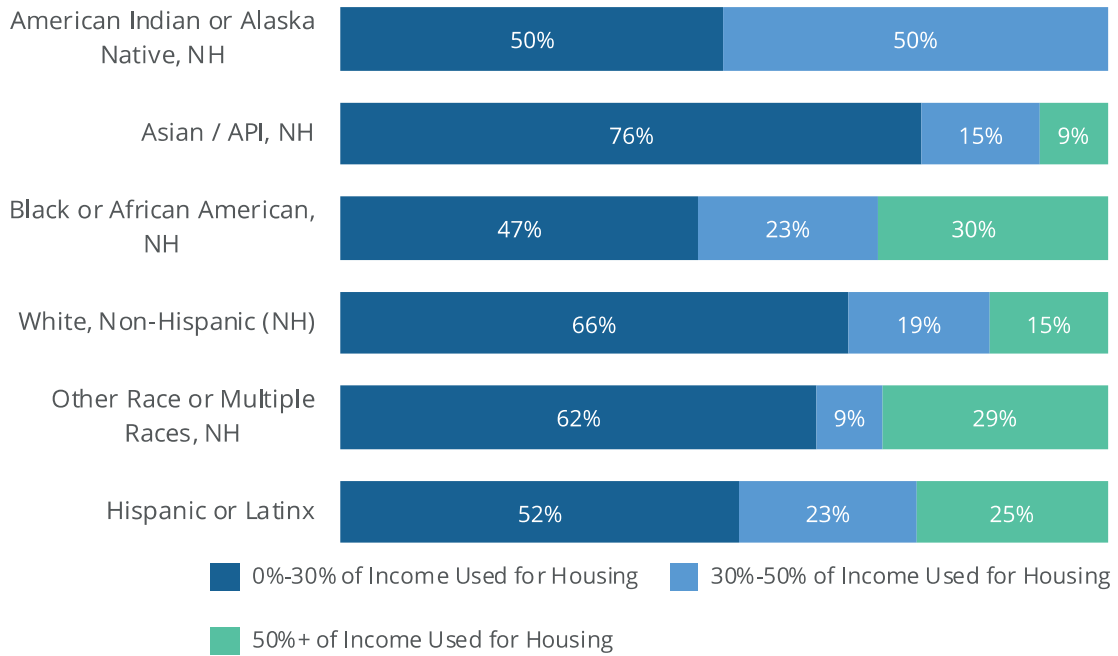
Source: ABAG Housing Needs Data Workbook

Figure IV-10.
Overpayment (Cost Burden) by Area Median Income (AMI), Belmont, 2019



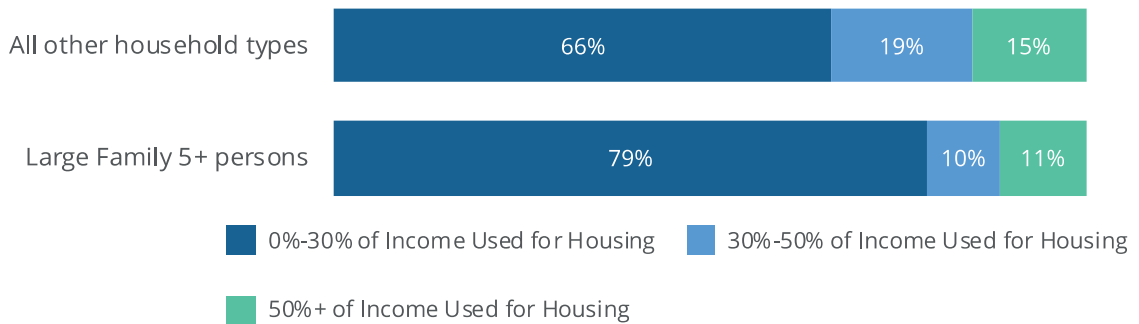
Source: ABAG Housing Needs Data Workbook

Figure IV-11.
Overpayment (Cost Burden) by Race and Ethnicity, Belmont, 2019



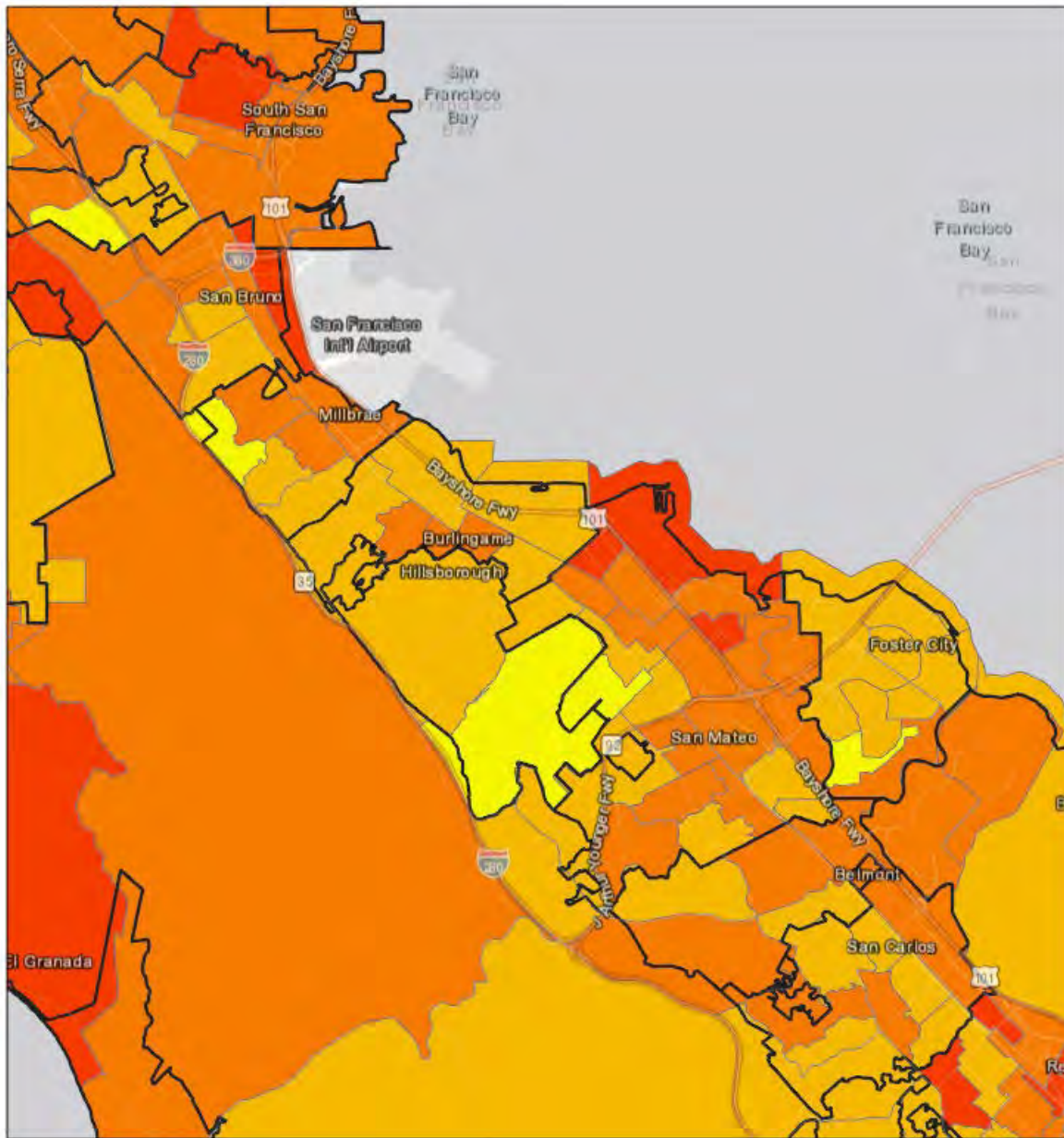
Source: ABAG Housing Needs Data Workbook

Figure IV-12.
Overpayment (Cost Burden) by Family Size, Belmont, 2019



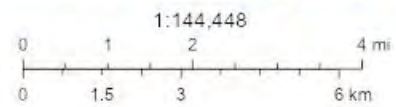
Source: ABAG Housing Needs Data Workbook

Figure IV-13.
Overpayment (Cost Burden) for Renter Households by Census Tract, 2019



9/28/2021, 11:12:00 AM

-  City/Town Boundaries
- (R) Overpayment by Renters (ACS, 2015 - 2019) - Tract
-  < 20%
-  20% - 40%
-  40% - 60%
-  60% - 80%

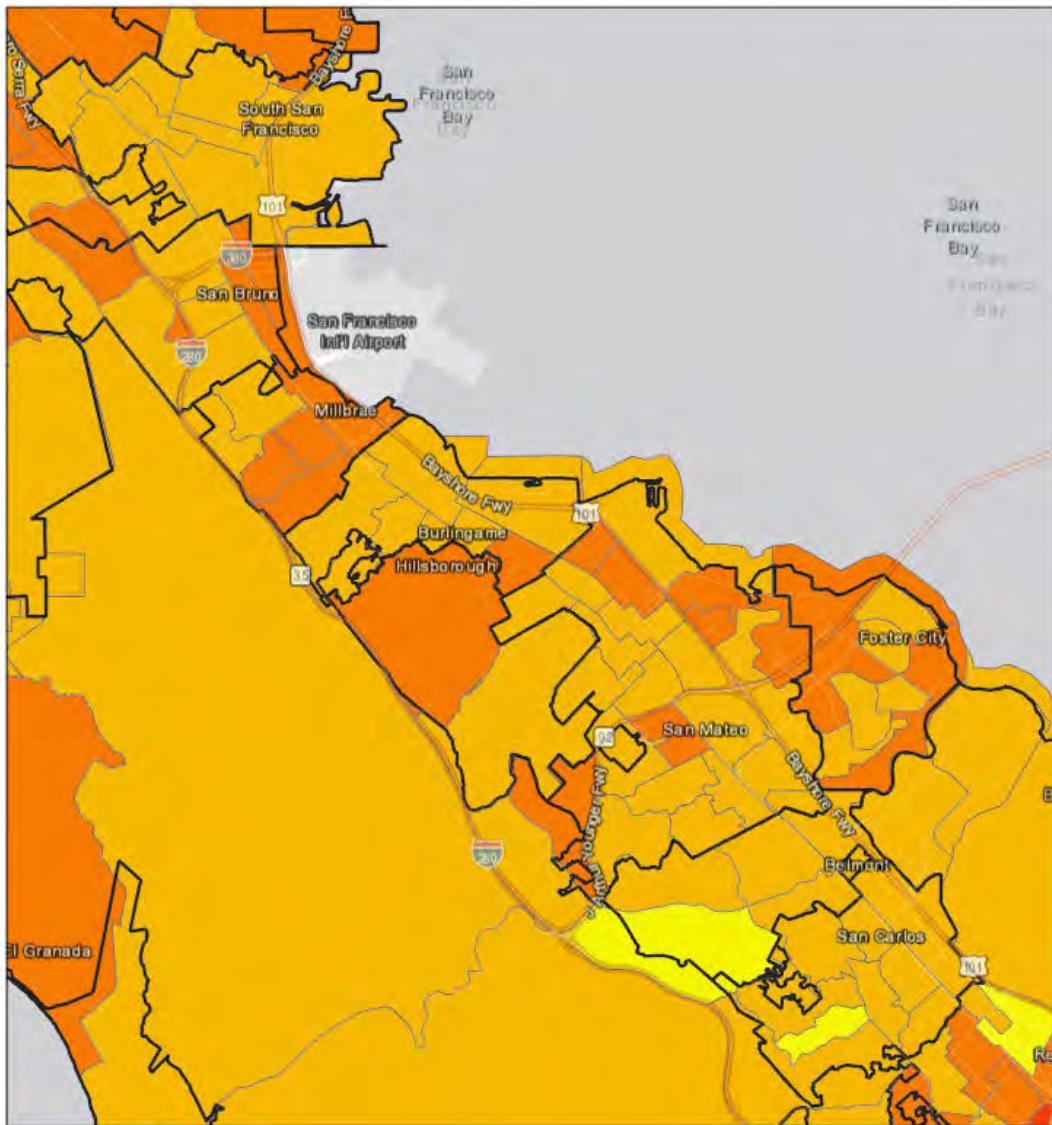


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Source: California Department of Housing and Community Development AFFH Data Viewer

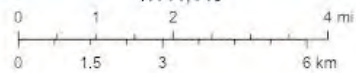
Figure IV-14.
Overpayment (Cost Burden) for Owner Households by Census Tract, 2019



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City/Town Boundaries



(R) Overpayment by Home Owners (ACS, 2015 - 2019) - Tract

- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%

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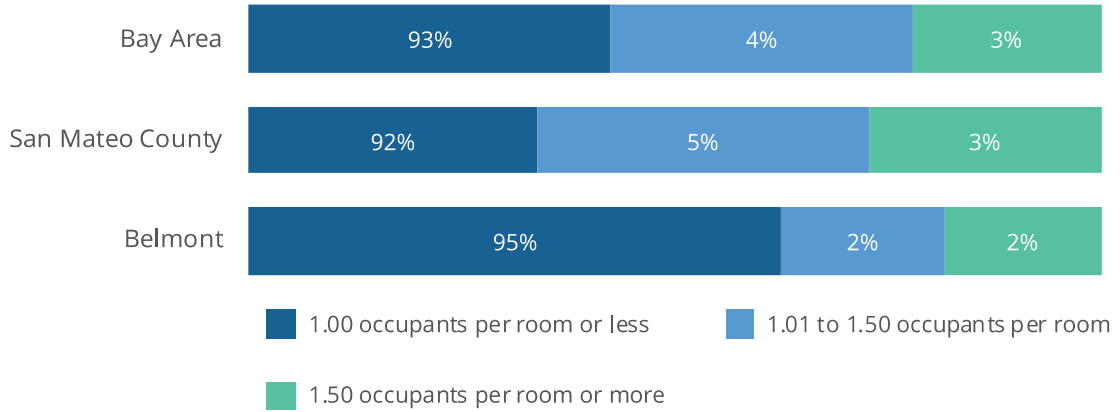
County of San Mateo, California, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021. CA HCD

Source: California Department of Housing and Community Development AFFH Data Viewer

Overcrowding.

Figure IV-15.

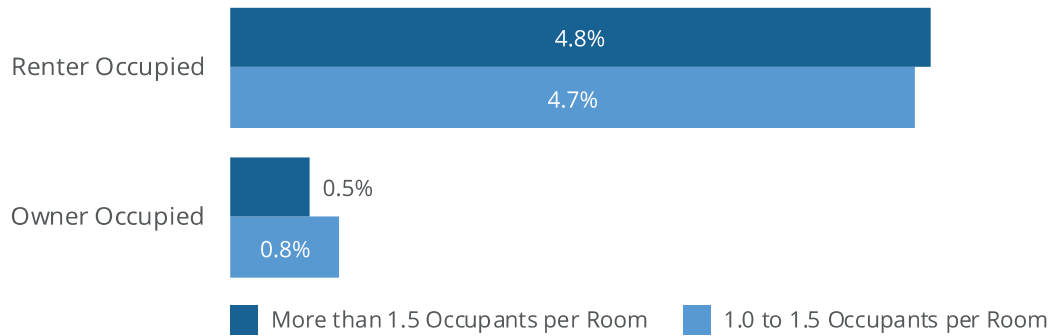
Occupants per Room by Jurisdiction, 2019



Source: ABAG Housing Needs Data Workbook

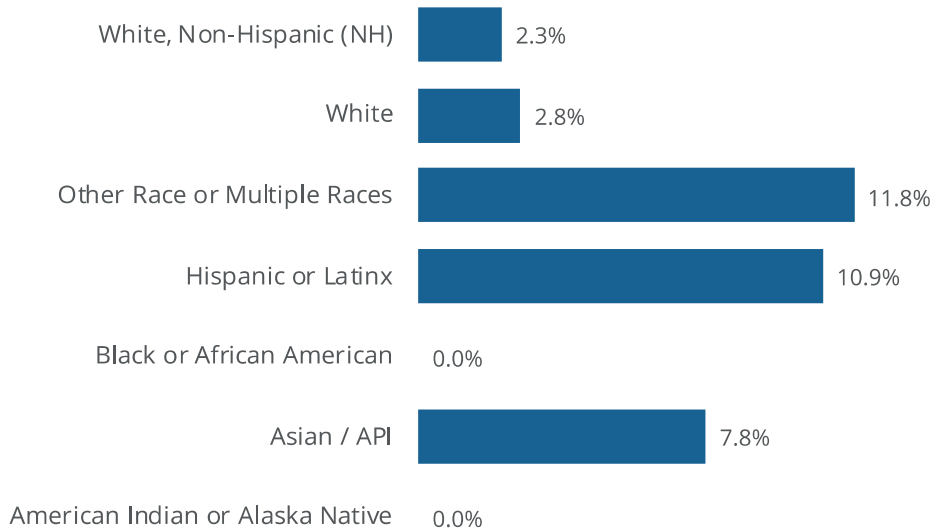
Figure IV-16.

Occupants per Room by Tenure, Belmont, 2019



Source: ABAG Housing Needs Data Workbook

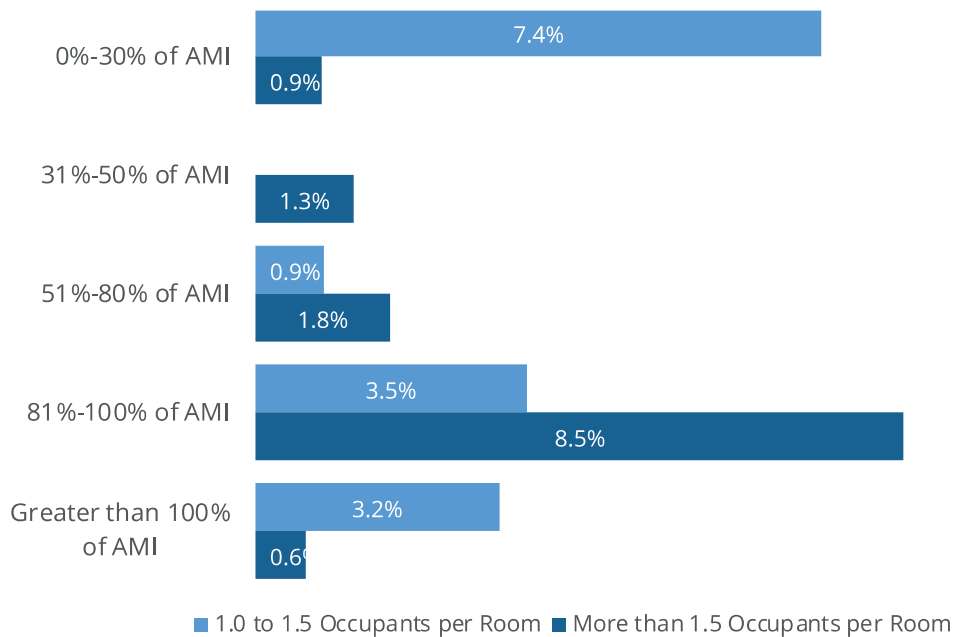
Figure IV-17.
Overcrowding by Race and Ethnicity, Belmont, 2019



Note: Overcrowding is indicated by more than 1 person per room.

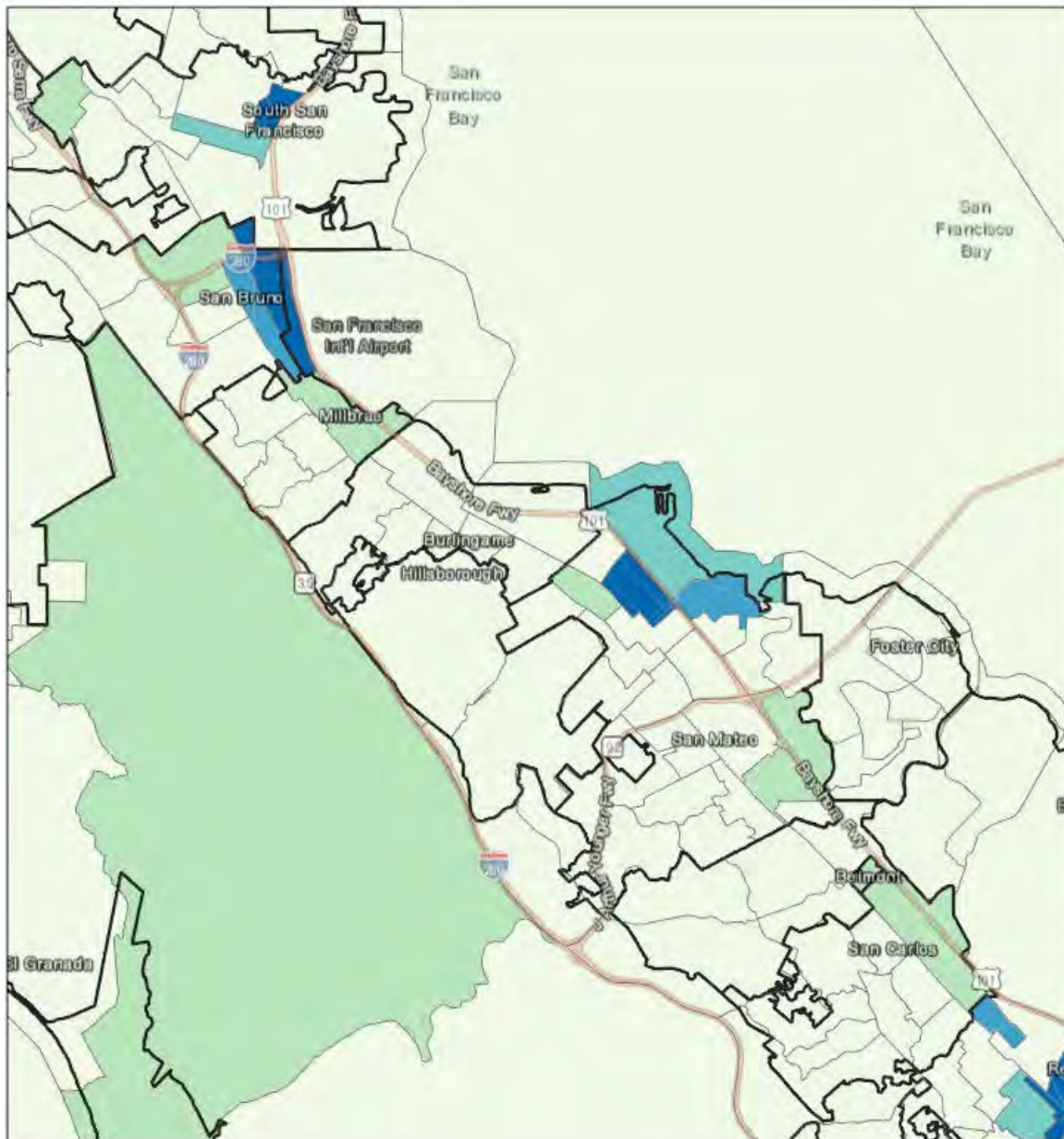
Source: ABAG Housing Needs Data Workbook

Figure IV-18.
Occupants per Room by AMI, Belmont, 2019



Source: ABAG Housing Needs Data Workbook

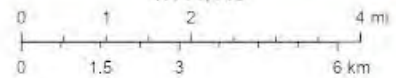
Figure IV-19.
Overcrowded Households by Census Tract, 2019



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- City/Town Boundaries
- (R) Overcrowded Households (CHHS) - Tract
- ≤ 8.2% (Statewide Average)
- 8.3% - 12%
- 12.01% - 15%
- 15.01% - 20%
- > 20%



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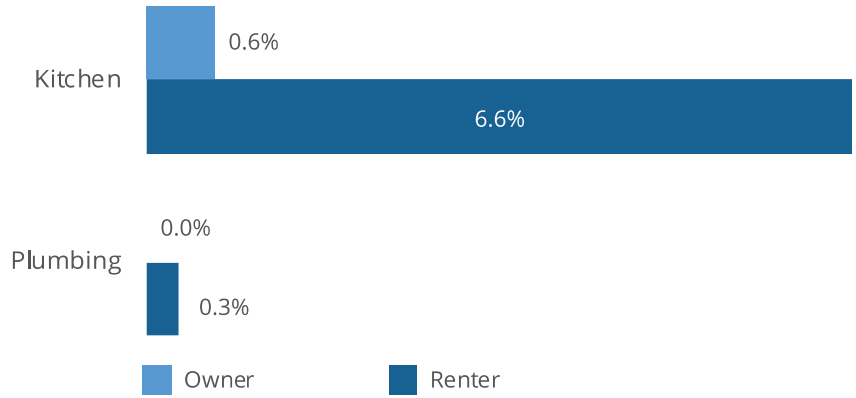
County of San Mateo, California, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, CA HCD

Source: California Department of Housing and Community Development AFFH Data Viewer

Substandard housing.

Figure IV-20.

Percent of Units Lacking Complete Kitchen and Plumbing Facilities, Belmont, 2019



Source: ABAG Housing Needs Data Workbook

Homelessness.

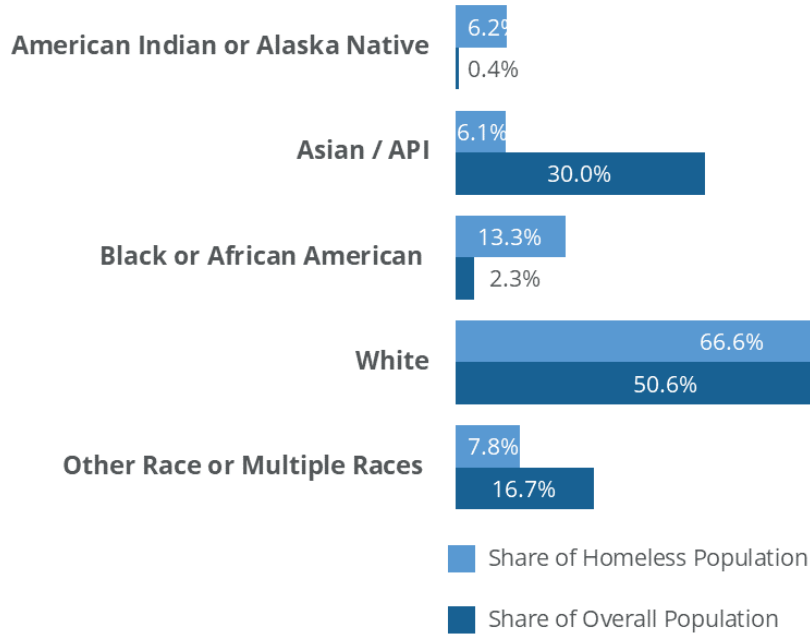
Figure IV-21.

Homelessness by Household Type and Shelter Status, San Mateo County, 2019

	People in Households Solely Children	People in Households with Adults and Children	People in Households Without Children
Sheltered - Emergency Shelter	0	68	198
Sheltered - Transitional Housing	0	271	74
Unsheltered	1	62	838

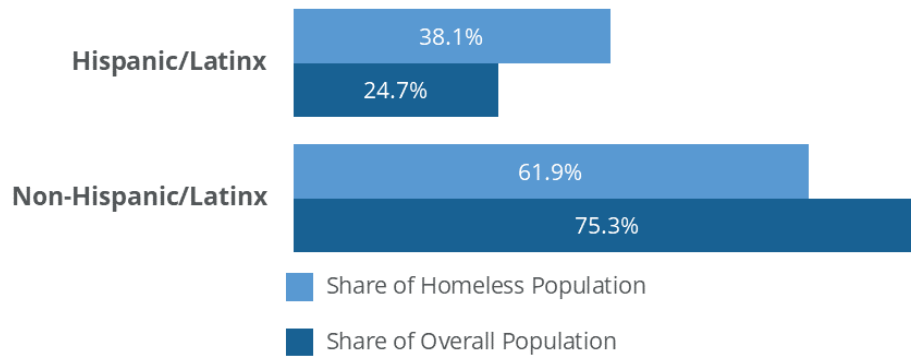
Source:
ABAG Housing Needs Data Workbook

Figure IV-22.
Share of General and Homeless Populations by Race, San Mateo County, 2019



Source: ABAG Housing Needs Data Workbook

Figure IV-23.
Share of General and Homeless Populations by Ethnicity, San Mateo County, 2019



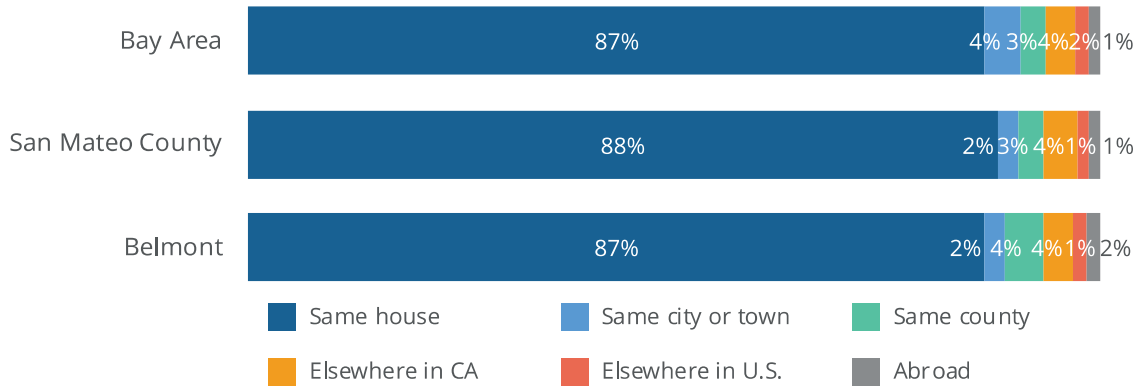
Source: ABAG Housing Needs Data Workbook

Figure IV-24.
Characteristics of the Population Experiencing Homelessness, San Mateo County, 2019

	Chronic Substance Abuse	HIV/AIDS	Severely Mentally Ill	Veterans	Victims of Domestic Violence
Sheltered - Emergency Shelter	46	0	70	31	10
Sheltered - Transitional Housing	46	3	46	4	14
Unsheltered	20	0	189	34	103

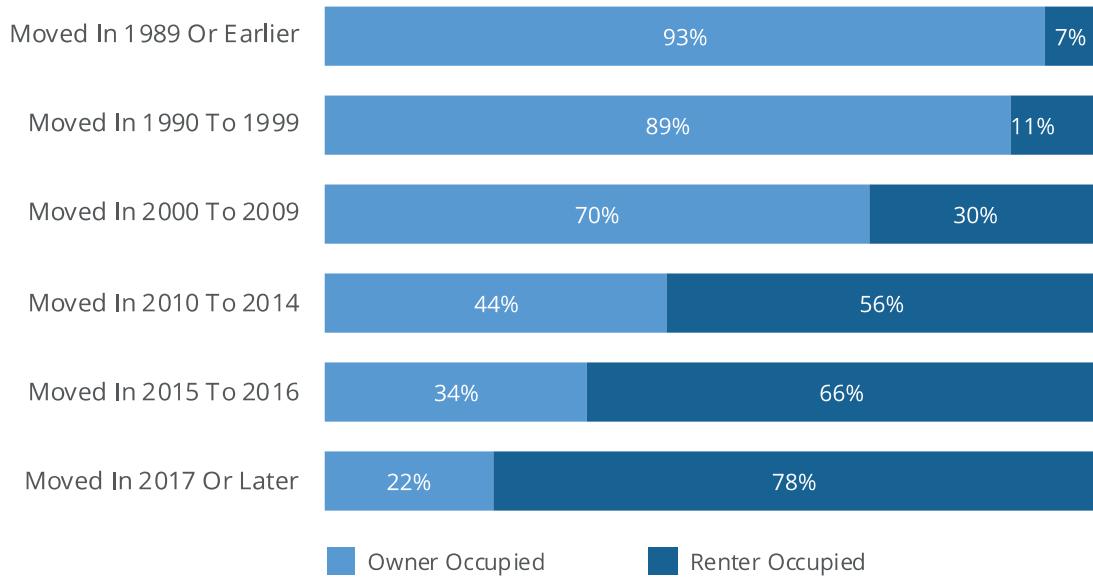
Source: ABAG Housing Needs Data Workbook

Displacement.
Figure IV-25.
Location of Population One Year Ago, Belmont, 2019



Source: ABAG Housing Needs Data Workbook

Figure IV-26.
Tenure by Year Moved to Current Residence, Belmont, 2019



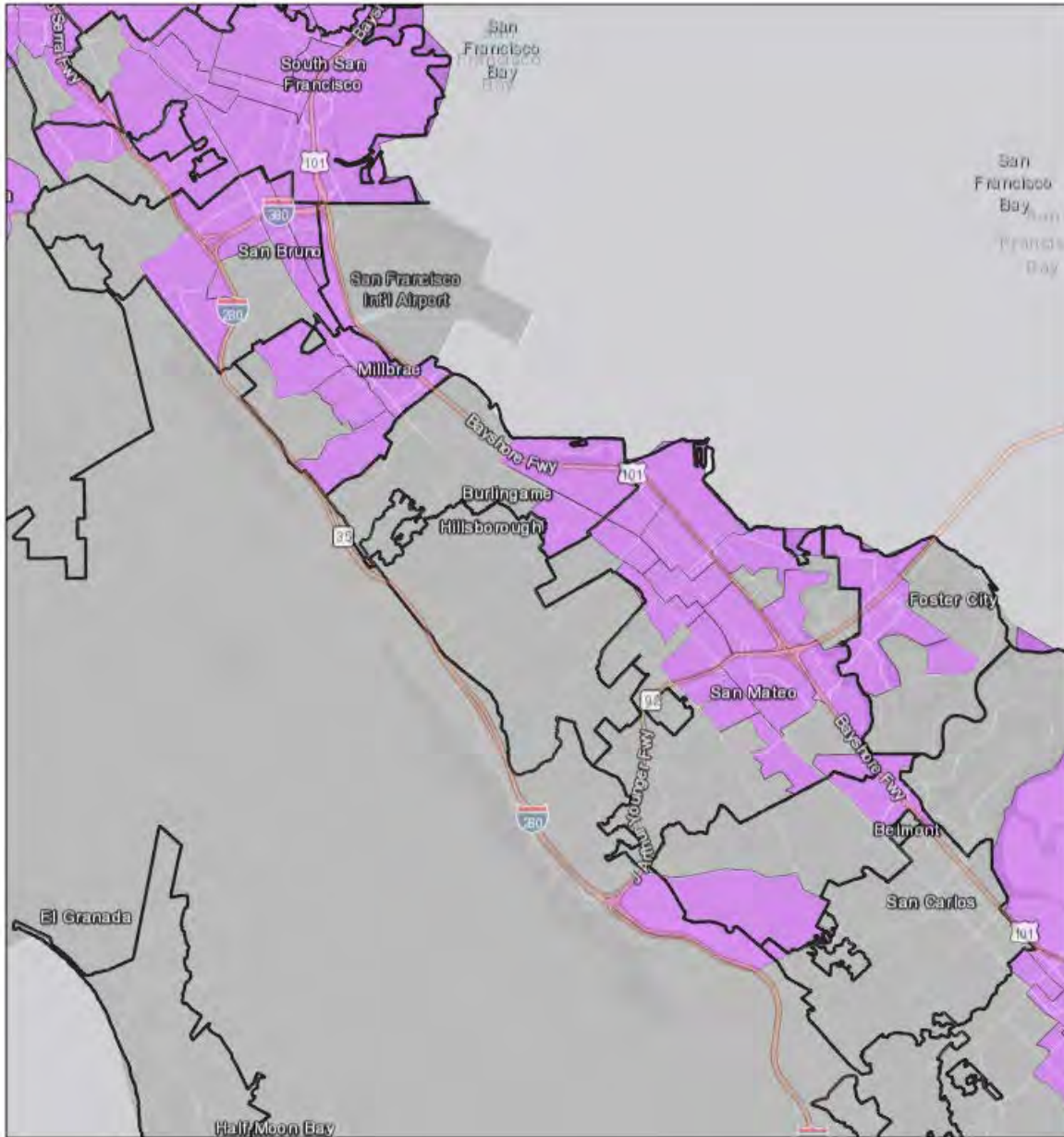
Source: ABAG Housing Needs Data Workbook

Figure IV-27.
Assisted Units at Risk of Conversion, Belmont, 2019




	Low	Moderate	High	Very High	Total Assisted Units in Database
Belmont	84	0	0	0	84
San Mateo County	4,656	191	359	58	5,264
Bay Area	110,177	3,375	1,854	1,053	116,459

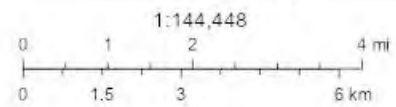
Source: ABAG Housing Needs Data Workbook

Figure IV-28.
Census Tracts Vulnerable to Displacement



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-  City/Town Boundaries
- (A) Sensitive Communities (UCB, Urban Displacement Project)
-  Vulnerable
-  Other

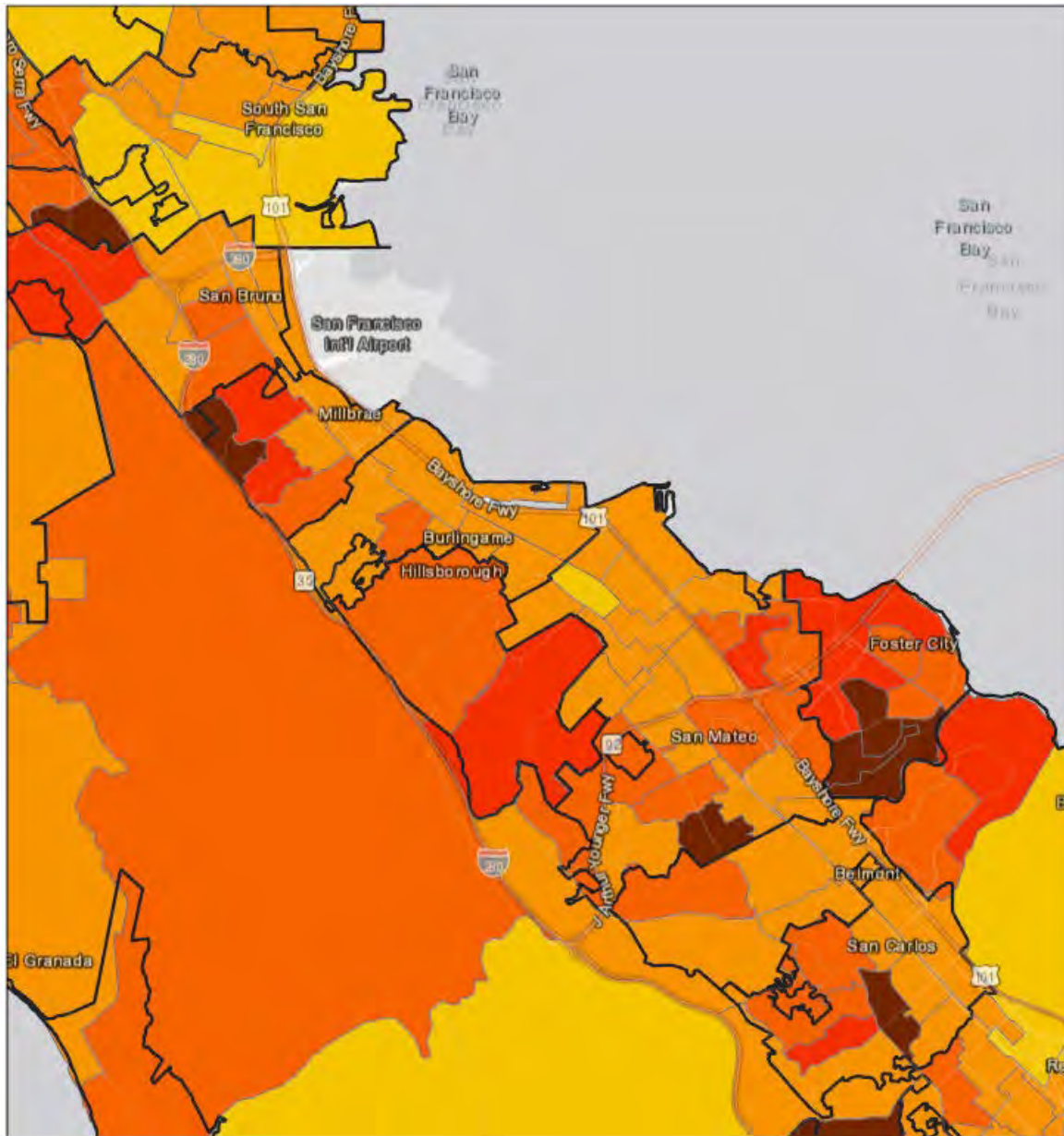


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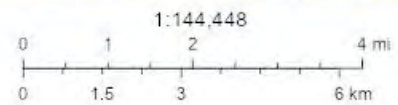
County of San Mateo, California, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021

Source: California Department of Housing and Community Development AFFH Data Viewer

Figure IV-29.
Location Affordability Index by Census Tract



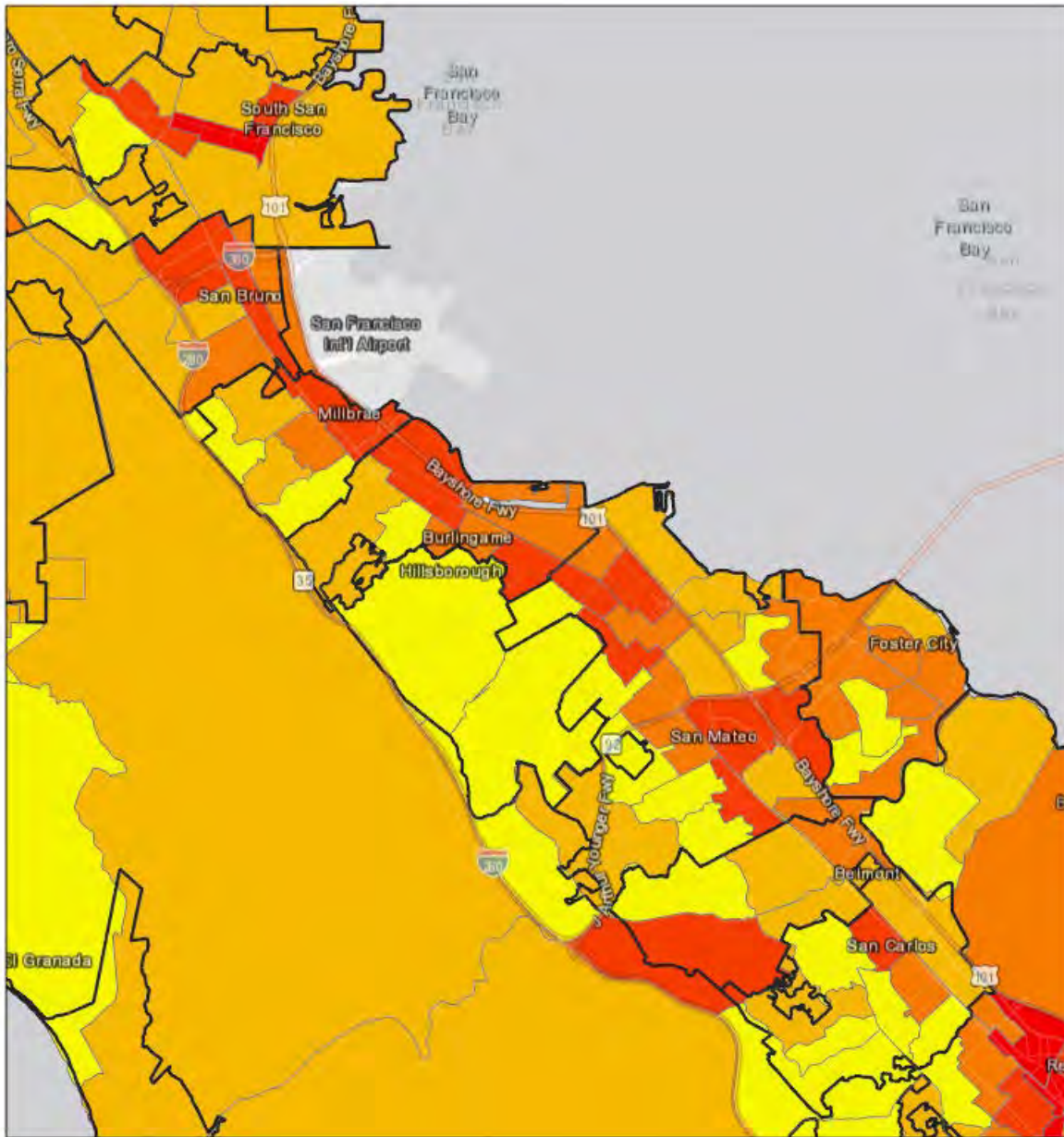
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CA HCD
 County of San Mateo, California, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021.
 Source: California Department of Housing and Community Development AFFH Data Viewer

Figure IV-30.
Share of Renter Occupied Households by Census Tract, 2019

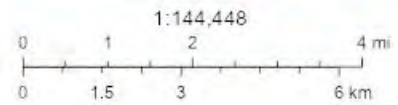


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City/Town Boundaries

(R) Percent of households in renter - occupied housing units (HUD) - Tract

- ≤ 20 %
- 20% - 40%
- 40% - 60%
- 60% - 80%
- > 80%

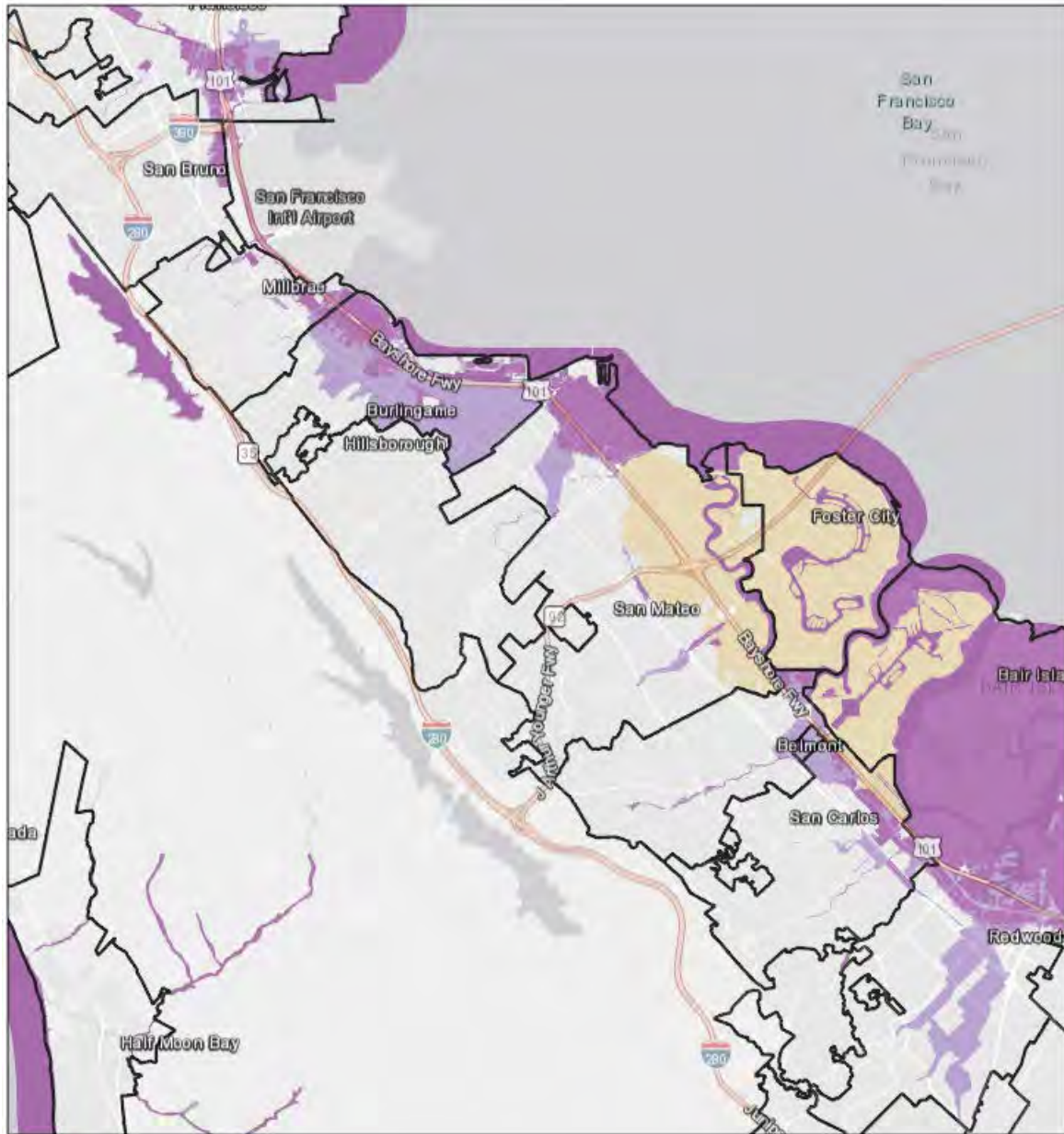


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County of San Mateo, California, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021. CA HCD

Source: California Department of Housing and Community Development AFFH Data Viewer

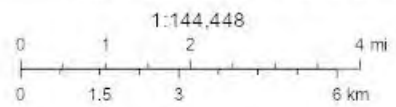
Figure IV-31.
Special Flood Hazard Areas, 2000



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(A) Special Flood Hazard Areas (FEMA, 2020)

- 1% Annual Chance Flood Hazard
- 0.2% Annual Chance Flood Hazard
- Regulatory Floodway
- Area with Reduced Risk Due to Levee
- City/Town Boundaries



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CA HCD

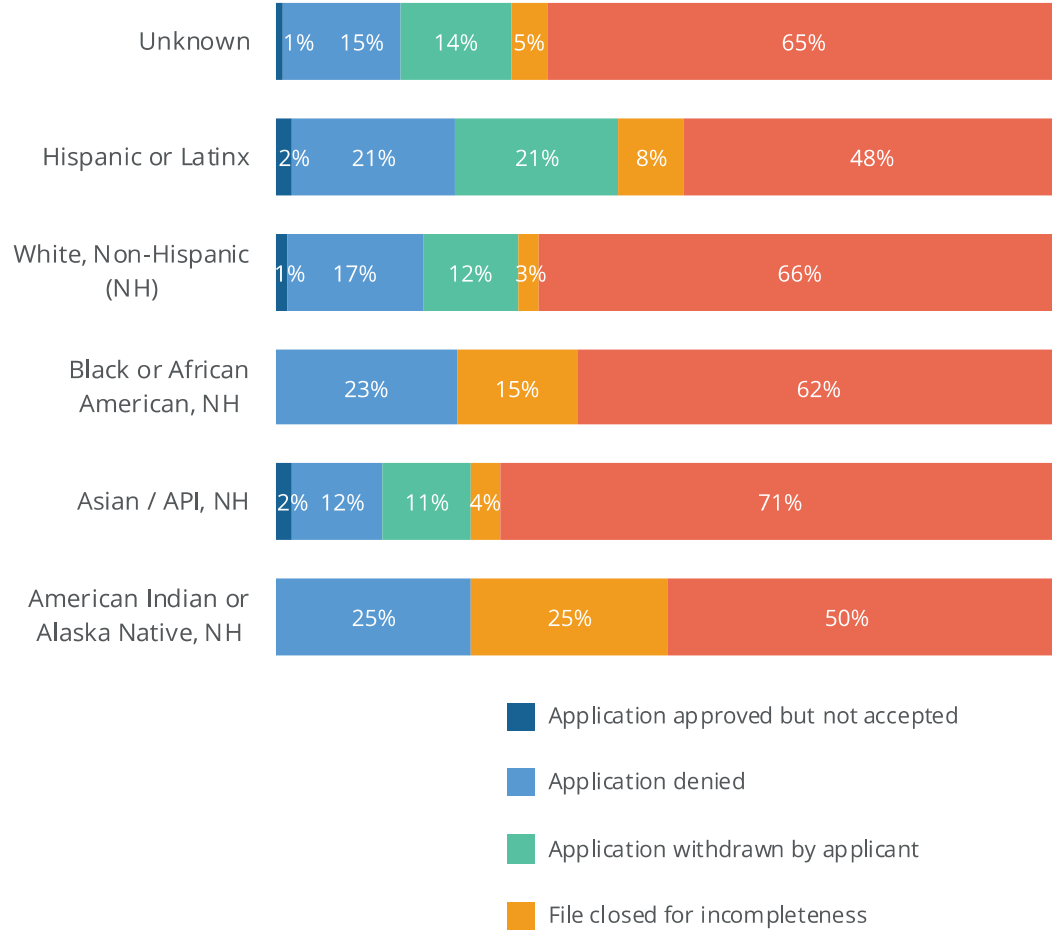
County of San Mateo, California, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021

Source: California Department of Housing and Community Development AFFH Data Viewer

Other considerations.

Figure IV-32.

Mortgage Applications by Race and Ethnicity, Belmont, 2018-2019

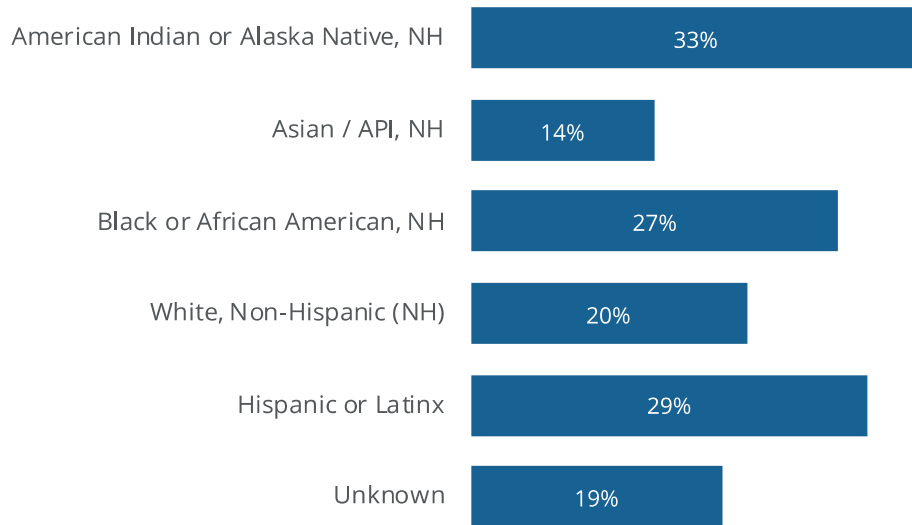


Source: ABAG Housing Needs Data Workbook

Figure IV-33.

Mortgage Application Denial Rate by Race and Ethnicity, Belmont, 2018-

2019



Source: ABAG Housing Needs Data Workbook

APPENDIX D: REVIEW OF PRIOR HOUSING ELEMENT GOALS, POLICIES, AND PROGRAMS

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2015-2023 BELMONT HOUSING ELEMENT PERFORMANCE REVIEW

The update of our Housing Element provides an opportunity to reflect on past achievements and challenges, identifying what is working and what is getting in the way in meeting Belmont's housing needs.

The following summary highlights key accomplishments and challenges from the previous Housing Element's planning period (2015-2023). This information will help ensure that the updated element for 2023 to 2031 builds on success, responds to lessons learned and positions us to better achieve our community's housing priorities.

A more detailed program-by-program review of progress and performance is provided in the table to follow.

PAST ACHIEVEMENTS

There is a lot to be proud of as we reflect on implementation of the Belmont Housing Element over the past eight years:

- **We built more housing than ever before.** Belmont surpassed our total RHNA allocation for the 5th Housing Element cycle based on building permits issued, though not all affordability levels were met. This is an incredible leap from the previous housing cycle, where we only built 31 units in eight years. Between 2015 and 2022, we permitted a total of 715 units, a tremendous achievement which speaks to the significant work put in by our staff, Council, and the community. Permitted units included 510 above market rate multi-family units, 84 low-income multi-family units, 35 very low-income multi-family units, 11 extremely low-income multi-family units, 27 single-family homes, and 75 ADUs (see Table D-2).
- **We supported new affordable housing.** Through our Inclusionary Housing Ordinance, use of City land, and partnership with nonprofit housing developers, we have helped create 205 new affordable units that are providing much needed housing for our lower-income residents. Examples of new developments including affordable housing are:
 - Firehouse Square, across the street from the train station, built by MidPen Housing on City-owned land, providing 65 new units of affordable housing;
 - The ROEM Development at 803 Belmont Avenue, approved in May 2022 and starting construction in Spring 2024, consisting of 125 new affordable rental units;
 - Artisan Crossings, a 250-unit development completed in 2024 that includes 38 low-income units as a result of the City's inclusionary zoning requirements; and,

- 815 Old County Road, a 177-unit development completed in 2024 that includes 27 low-income inclusionary housing units.
- **We laid the groundwork for a better planned city.** In 2017, we updated our General Plan for the first time since 1982, which will help ensure that we are planning for the future we want. We also adopted the Belmont Village Specific Plan, extended many of the more flexible zoning standards to all properties along the El Camino Real corridor, and created a new Corridor Mixed Use (CMU) zone along El Camino Real. We also went from zoning in terms of dwelling units per acre to floor area ratio (FAR), which has helped increase project densities and provide more housing units.
- **ADUs have ramped up.** Accessory dwelling units (ADUs), also referred to as second units or in-law units, have become increasingly popular after the City adopted a new ADU ordinance in response to changes in State law and removed its previous mandatory parking replacement policy. Interested homeowners can now add ADUs to their property more easily and many are, helping to create new rental housing in existing neighborhoods. Between 2018 and 2022, we permitted an average of 15 new ADUs per year; however, that number is increasing. The City issued permits for 27 new ADUs in 2022 and 21 in 2023.
- **We developed additional funding resources.** We have secured different financing sources to support our housing programs and services, including housing impact fees, commercial linkage fees, and inclusionary housing in-lieu funds.
- **We adopted an Anti-Displacement Policy.** As land values have increased and market rate housing developments have come in, there are concerns that lower-income residents and naturally occurring affordable housing (i.e., non-subsidized housing) are being displaced. In February 2022, the City adopted a Housing Preference Policy that prioritizes residents who live/work in San Mateo County or who have been displaced from a housing unit in San Mateo County in the last three years; this helps people stay in their communities and near their jobs.

As shown in tables D-1 and D-2, Belmont has made significant progress in approving and developing housing and meeting its RHNA obligations since 2015.

REMAINING CHALLENGES

While we got a lot done, there is a lot we still need to work on. One of the major challenges that kept us from achieving all our housing goals was limited staff capacity. Our staff is small, and we must address the needs of complex housing projects while also ensuring ongoing compliance with significant changes in State law pertaining to development review procedures. Additionally, once new units are built, they require ongoing management and compliance checks, which will stretch our staff resources even further.

TABLE D-1. ACCOMPLISHMENTS, 2015-2023

New Construction	ELI	VLI	LI	MOD	ABOVE MOD	Total
Single-family Residential Units (2015 -2022)	0	0	0	0	27	27
ADUs (2015-2022)	0	0	0	75	0	75
400 El Camino Real (The Ashton)	0	0	0	0	73	73
576-600 El Camino Real	0	0	0	0	32	32
Firehouse Square Phase 1 (Affordable)	11	35	19	0	1	66
1325 Old County Road (Artisan Crossings)	0	0	38	0	212	250
815 Old County Road	0	0	27	0	150	177
Firehouse Square Phase 2 (Market rate)	0	0	0	0	15	15
Total	11	35	84	75	510	715

Source: Belmont’s Review of 2015-2023 Housing Element Performance

TABLE D-2. QUANTIFIED RHNA OUTCOMES, 2015-2023

Objectives vs. Actual by Income	RHNA	Actual	Percent of RHNA Met
Extremely low-income	63	11	17%
Very low-income	63	35	56%
Low-income	76	84	111%
Moderate-income	70	75	107%
Above moderate-income	200	510	256%
Total	472	715	151%

Source: Belmont’s Review of 2015-2023 Housing Element Performance.

OPPORTUNITIES AHEAD

The following are things already in motion based on existing work efforts, trends, and lessons learned that we are incorporating in our updated Housing Element.

- **We are developing new ADU programs to do even more.** We plan to strengthen our city’s ADU program by undertaking a second unit legalization program. This will make sure that second units which were constructed before the current ADU ordinances are incorporated into our legal housing stock once they meet all safety codes.
- **There are more incentives than ever to build housing.** For example, lot consolidation—which is linked to more efficient housing construction because of economies of scale—has historically been a challenge in Belmont. However, we are now seeing that these challenges are being overcome because of the market demand and housing needs. We’ve identified small sites that, when grouped together, can sustain housing developments, and we currently have a site consolidation program to facilitate that process.

- **We're prepared to handle our new housing targets.** Thanks to the updates of our General Plan and Belmont Village Specific Plan, we will be able to amend these documents to make sure we can plan for future RHNA numbers without needing to undertake major rezoning.

2015-2023 BELMONT HOUSING ELEMENT: EVALUATION

In addition to this status report, the State Department of Housing and Community Development has provided guidance on reporting about the impact of actions on special needs groups; specifically, "Provide a description of how past programs were effective in addressing the housing needs of the special populations. This analysis can be done as part of describing the effectiveness of the program if the jurisdiction has multiple programs to specifically address housing needs of special needs populations or if specific programs were not included, provide a summary of the cumulative results of the programs in addressing the housing need terms of units or services by special need group."

Because of its small size and the fact that it is not an entitlement jurisdiction with federal funds, the City does not provide direct services to individuals or households and as such does not have a mechanism for tracking services to special needs groups. In addition, with the dissolution of Redevelopment Agencies in 2012, the City lost its primary source of funding to assist in the development of affordable housing, including housing that would serve special needs groups. The following status update includes information on special needs groups only to the extent that information was made available to the City.

TABLE D-3. EVALUATION OF 2015-2023 HOUSING ELEMENT PAST PERFORMANCE

Program No./Name	Description and Objective	Timeframe and Achievements	Recommendation
Goal 1: Assure the quality, safety, and livability of existing housing and the continued high quality of residential neighborhoods.			
1.1 Code Enforcement	<p>Action 1: Continue to implement code enforcement activities.</p> <p>Action 2: Maintain an inventory of code enforcement actions to determine citywide trends – such as overcrowding – and evaluate potential actions the City can take to counter these trends.</p> <p>Action 3: Code enforcement staff shall distribute information to property owners related to countywide rehabilitation programs and/or funding opportunities, as well as any local rehabilitation program opportunities made available by the Housing Successor, subject to availability of funding in the housing asset fund (Program 2.2)</p>	<p>All actions are ongoing and conducted by the Belmont Police Department.</p> <p><u>Effectiveness:</u> Actions 1 and 2 have been effective in ensuring quality of housing stock. The data maintained by Code Enforcement suggests common themes for enforcement are more related to property maintenance, abandoned vehicles, noise, and smoking in multi-family housing units (prohibited in Belmont).</p> <p><u>Appropriateness:</u> Ongoing need for standard code enforcement services conducted by the Belmont Police Department.</p> <p><u>Quantification:</u> No quantification data available for this action.</p> <p><u>Special Needs Analysis:</u> No information on special needs is available for this program.</p>	<p>Ongoing.</p> <p>Police Department will continue to administer code enforcement activities.</p> <p>The updated Housing Element includes a program to partner with organizations that provide repair and energy-efficiency improvements for properties occupied by low-income residents (Program H2.4)</p> <p>Code enforcement can continue to distribute fair housing and housing rehabilitation information.</p>
1.2 Residential Records Report and Inspection Program	<p>Action 1: Establish and maintain an Existing Conditions Survey for single-family properties.</p> <p>Action 2: Implement a two-year pilot Residential Records Report and Inspection Program.</p> <p>Action 3: Evaluate and determine whether to adopt a final Residential Records Report and Inspection Program.</p>	<p>No specific action to report on programs 1-3 This program has not been implemented due to lack of staffing resources to implement and sustain such a program. Permit Center staff continue to provide residential records data to interested parties to support real estate transactions and housing projects.</p> <p><u>Effectiveness:</u> Not effective as it has not been implemented.</p> <p><u>Appropriateness:</u> No longer needed.</p> <p><u>Quantification:</u> No program activity.</p> <p><u>Special Needs Analysis:</u> No information on special needs is available for this program.</p>	<p>Remove.</p>

TABLE D-3. EVALUATION OF 2015-2023 HOUSING ELEMENT PAST PERFORMANCE

Program No./Name	Description and Objective	Timeframe and Achievements	Recommendation
1.3 Condominium Conversion Ordinance	Action 1: Continue to enforce the Condominium Conversion Ordinance.	<p>Completed; ongoing.</p> <p><u>Effectiveness:</u> Although the ordinance has not been used during the current planning period, it continues to be an effective mechanism for maintaining rental uses.</p> <p><u>Appropriateness:</u> Ongoing need for this activity.</p> <p><u>Quantification:</u> zero rental units converted to condominiums during the current period.</p> <p><u>Special Needs Analysis:</u> No information on special needs is available for this program.</p>	<p>Ongoing.</p> <p>The City will continue to administer this ordinance as required by the Municipal Code. No new program required.</p>
1.4 Preservation of Affordable Housing	<p>Action 1: Continue to streamline and enforce the annual reporting required to verify income limits of affordable units with an emphasis on for-profit owners.</p> <p>Action 2: Provide technical assistance to property owners and/or organizations interested in purchasing and maintaining the properties should the owners be interested in selling as necessary and when feasible.</p> <p>Action 3: Adopt an ordinance for “At Risk” units requiring one-year notice to residents, the city, and the San Mateo County Department of Housing of all proposed conversions of subsidized housing units to market rents.</p>	<p>Actions 1 and 2 are ongoing. Action 3 – no ordinance has been adopted to date, but staff and project managers have complied with the recommended extended notification requirements.</p> <p><u>Effectiveness:</u> Program has been effective in preventing loss of units at risk of conversion.</p> <p><u>Appropriateness:</u> Ongoing need for this activity; additional modifications will assist in strengthening protections.</p> <p><u>Quantification:</u> The City maintained 257 affordable housing units.</p> <p><u>Special Needs Analysis:</u> Many of Belmont’s subsidized housing units serve special needs populations, including lower-income households. While there is no risk of loss of subsidized units during the next planning period, the City will begin looking for long term sustainable solutions for affordable housing serving special needs groups.</p>	<p>Retain modified program to identify service provider to manage the rapidly growing portfolio of affordable housing units (Program H2.2).</p>

TABLE D-3. EVALUATION OF 2015-2023 HOUSING ELEMENT PAST PERFORMANCE

Program No./Name	Description and Objective	Timeframe and Achievements	Recommendation
1.5 Anti-Displacement Policy	<p>Action 1: Adopt appropriate programs and policies such as density bonus program and fair housing program to address displacement within 2 years of adoption of the housing element.</p> <p>Action 2: Monitor programs and policies annually for effectiveness.</p> <p>Action 3: Complete anti-displacement analysis through 21 Elements and anti-displacement nexus study.</p>	<p>Action 1: The City updated the Density Bonus program in 2014 to comply with State law. The City also adopted an anti-displacement housing preference policy in 2022 that prioritizes affordable housing units for people who live/work in San Mateo County or have been displaced from housing in the last three years.</p> <p>Action 2: Ongoing.</p> <p>Action 3: Ongoing.</p> <p><u>Effectiveness</u>: Program will be effective in preventing loss of units at risk of displacement.</p> <p><u>Appropriateness</u>: Ongoing need for this activity; additional modifications will assist in strengthening protections.</p> <p><u>Quantification</u>: This program does not have quantifiable activity to report.</p> <p><u>Special Needs Analysis</u>: The adopted housing preference policy helps income-qualified Belmont and San County residents from being displaced from the community as housing prices continue to rise.</p>	Retain revised tenant protections program (Program H5.6).

TABLE D-3. EVALUATION OF 2015-2023 HOUSING ELEMENT PAST PERFORMANCE

Program No./Name	Description and Objective	Timeframe and Achievements	Recommendation
<i>Goal 2: Facilitate the development of a variety of housing types at appropriate locations.</i>			
2.1 Affordable Housing Development	<p>Action 1: Work to have legalization / amnesty program for ADUs</p> <p>Action 2: Transfer or sell real property assets to leverage provision and development of affordable housing projects for all income groups including extremely low, very low, and low-income households.</p> <p>Action 3: Complete the San Mateo County-Wide Affordable Housing Nexus Study by February 2015.</p> <p>Action 4: Develop and Implement an Inclusionary Housing Ordinance and adopt Housing Impact Fees by December 2015.</p> <p>Action 5: Ensure ongoing compliance with California Health and Safety Code.</p>	<p>Action 1: No activity.</p> <p>Action 2: The City has identified a tentative owner for two special needs group homes; County of San Mateo took actions to forgive outstanding debts on these properties. Tenant Relocation Plan and Housing Replacement Plans were adopted in March 2019; Tenants were successfully relocated in July and August 2019, Sale of four properties anticipated to close in July 2022 and proceeds from market rate sales will be used to fund pipeline 100% affordable housing projects.</p> <p>Actions 3 and 4: Inclusionary Ordinance adopted January 2017; Inclusionary rental ordinance adopted Fall 2018; Nexus study available. Completed.</p> <p>Action 5: Ongoing.</p> <p><u>Effectiveness:</u> Program has been effective in creating new affordable units through both funding mechanisms and creating BMR units.</p> <p><u>Appropriateness:</u> Ongoing need for this activity; additional modifications will assist in addressing deeper affordability and assistance to special needs households.</p> <p><u>Quantification:</u> Belmont generated \$2.9M from sale of three real property assets (3 units) that the City has allocated to two pipeline affordable housing projects that will produce 162 new affordable units. The Belmont Inclusionary Ordinance has generated \$766,369 of in-lieu fees and 102 restricted affordable housing units (65 units completed in 2023, 37 units recently approved).</p> <p><u>Special Needs Analysis:</u> The City has allocated \$3.5M of housing funds to projects that include lower-income units and a 5% unit set aside for households at risk of homelessness (per San Mateo County AHF).</p>	<p>Retain revised program to use public funds for development of lower-income housing (Program H1.2).</p>

<p>2.2 Affordable Housing Rehabilitation, Operation, and Management</p>	<p>Action 1: Continue to annually monitor City-owned rental properties to ensure that affordability is being maintained.</p> <p>Action 2: In compliance with SB 341, the Housing Successor must initiate activity on affordable housing real property assets by August 31, 2017. By June 2015, the Housing Successor shall work with the City Attorney to clarify permitted uses of real property assets.</p> <p>Action 3: By December 2015, the Housing Successor shall hold meetings with San Mateo County affordable housing developers/service providers to determine what opportunities are available for rehabilitation of housing units in Belmont.</p> <p>Action 4: By December 2016, the Housing Successor shall develop a housing asset funds disposition program (subject to funding availability) that provides local funding for rehabilitation of existing housing units.</p> <p>Action 5: By June 2017, the Housing Successor shall develop and implement a housing rehabilitation outreach program (subject to funding availability). Information shall be posted to the City of Belmont website and distributed to residents via code enforcement staff (Program 1.1).</p>	<p>Action 1: Annual, completed, ongoing.</p> <p>Action 2: June 2015, completed. All Housing Successor properties have been rezoned via Belmont Village Specific Plan and El Camino Corridor mixed-use zoning policies, several properties subject to RFP process and new housing development proposal.</p> <p>Action 3: December 2015, the city held meetings with affordable housing developers to discuss opportunities for rehabilitation projects. No sites identified.</p> <p>Action 4: December 2016, The City Housing Successor maintains an Affordable Housing Fund that is funded by housing impact/mitigation fees, and other developer contributions. The City of Belmont committed \$5.65 million towards the Belmont Firehouse Square affordable housing project which is now under construction. Further funding to be acquired through generative properties.</p> <p>Action 5: No activity to report.</p> <p><u>Effectiveness</u>: Program has been effective in retaining units in the housing stock.</p> <p><u>Appropriateness</u>: Ongoing need for this activity; additional modifications will assist in addressing deeper affordability and assistance to special needs households.</p> <p><u>Quantification</u>: The City invested land and \$5.65M of Low-Moderate Income (LMI) housing funds in the Firehouse Square Project. The City committed an additional \$3.5M towards two additional affordable housing projects. The program has not yet facilitated housing unit rehabilitation.</p> <p><u>Special Needs Analysis</u>: Projects that have or will receive affordable housing funds from the City of Belmont maintain a minimum 5% unit set aside for households at risk of homelessness and include restricted lower-income housing units.</p>	<p>The Housing Element includes a revised program to partner with organizations that provide repair and energy-efficiency improvements for properties occupied by low-income residents (Program H2.4).</p>
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TABLE D-3. EVALUATION OF 2015-2023 HOUSING ELEMENT PAST PERFORMANCE

Program No./Name	Description and Objective	Timeframe and Achievements	Recommendation
2.3 Belmont Village Priority Development Area Strategy	<p>Action 1: Adopt new comprehensive zoning regulations for the Belmont Village Priority Development Area. The zoning will:</p> <ul style="list-style-type: none"> ▪ Allow high-quality, mixed-use, high-density (30-45 units/acre), 40-50 foot-tall development; ▪ Consider alternative parking arrangements such as shared parking, parking districts, or requirement for parking to be behind primary buildings; Streamline the development process; and ▪ Incorporate provisions to protect the economic viability of existing commercial uses, while considering the quality of life for new residents. <p>Action 2: Adopt design guidelines for the Villages of Belmont Area to clarify requirements and facilitate the development review process.</p> <p>Action 3: Adopt Belmont Village Specific/Implementation Plan using C/CAG PDA Planning Grant Funds.</p> <p>Action 4: Replace the Downtown Specific Plan with a new Belmont Village Specific/ Implementation Plan in the General Plan.</p>	<p>Action 1: Completed December 2015.</p> <p>Action 2: Completed December 2015.</p> <p>Action 3: Completed June 2016.</p> <p>Action 4: Completed June 2016.</p> <p>All actions completed as of November 2017.</p> <p><u>Effectiveness:</u> Program has been creating zoning regulations to facilitate new housing development.</p> <p><u>Appropriateness:</u> As these actions are completed, no additional need for them.</p> <p><u>Quantification:</u> Through June 2023, five multi-family housing projects have been approved and permitted in either the BVSP area or along the El Camino Real corridor, resulting in construction of 670 new multi-family housing units.</p> <p><u>Special Needs Analysis:</u> No information on special needs is available for this program.</p>	<p>Completed, remove.</p> <p>The Housing Element includes a new program to modify CMU zoning district to eliminate maximum density and allow increased FAR to align with the successful BVSP zoning standards (Program H4.1, completed January 2024).</p>

TABLE D-3. EVALUATION OF 2015-2023 HOUSING ELEMENT PAST PERFORMANCE

Program No./Name	Description and Objective	Timeframe and Achievements	Recommendation
2.4 Developer Outreach	<p>Action 1: Revise development review process and permit materials to be distributed at the permit center and on the City’s website to explain the various steps in the process. This includes what materials need to be submitted and when and how long review will take at each juncture.</p> <p>Action 2: Continue to meet with private and nonprofit housing developers on a regular basis. Consider hosting an annual developer roundtable to discuss development opportunity sites and other development issues.</p>	<p>Action 1: June 2015, completed. Significant overhauls to the design review process adopted in 2015 and 2016. Website upgraded, planning and building application materials upgraded and modernized.</p> <p>Action 2: Ongoing, regular meetings with affordable housing developers to discuss opportunities in the City of Belmont.</p> <p><u>Effectiveness:</u> Program has been effective in developing positive relationships with developers and providing critical information to them.</p> <p><u>Appropriateness:</u> Ongoing need for this activity; additional modifications will help strengthen resources available to facilitate development.</p> <p><u>Quantification:</u> No quantifiable activity to report.</p> <p><u>Special Needs Analysis:</u> No information on special needs is available for this program.</p>	<p>A new program has been included to ensure information and materials related to streamlined development review options (SB 35) are available on the City website, at City Hall, and that staff are prepared to implement streamlined review (Program H4.6).</p>

TABLE D-3. EVALUATION OF 2015-2023 HOUSING ELEMENT PAST PERFORMANCE

Program No./Name	Description and Objective	Timeframe and Achievements	Recommendation
2.5 Site Consolidation	<p>Action 1: Develop, adopt, and implement a lot consolidation program to allow for the assembly of multiple continuous parcels. The program will consider incentives such as:</p> <ul style="list-style-type: none"> ▪ Density bonuses (Program 4.3), ▪ Direct Affordable Housing funds to leverage consolidation (Program 2.1), and other available incentives. <p>Action 2: The Housing Successor Agency will work directly with property owners and affordable housing developers to facilitate consolidation of parcels by:</p> <ul style="list-style-type: none"> ▪ Conducting an outreach program beginning in Spring 2015 to potential affordable housing developers; ▪ Providing a map of opportunity sites, such as the ones identified in the Housing Element, on the City’s website as well as on handouts at the Permit Center, by December 2015; and, ▪ Evaluating the potential to vacate alleys or rights-of-way that are no longer needed for public use for consolidation with adjacent sites. 	<p>Action 1: Density bonus program updated and City financial assets applies to project consolidating smaller lots.</p> <p>Action 2: Map created discussions ongoing, no other specific action to report.</p> <p><u>Effectiveness</u>: Program has been moderately effective, since small lot consolidation has not been a significant constraint in Belmont.</p> <p><u>Appropriateness</u>: Current program actions no longer needed. Create new program to offer financial incentive for projects that include lower-income housing units.</p> <p><u>Quantification</u>: The City has approved and permitted eight multi-family housing projects during the 5th cycle planning period, all of which required lot consolidations. These lot consolidations will facilitate development of 789 new multi-family housing units.</p> <p><u>Special Needs Analysis</u>: No information on special needs is available for this program.</p>	<p>Small lot consolidation has not proven to be an ongoing governmental constraint based on the City’s current development pipeline. A table showing development of housing on non-vacant sites is included in the <i>Chapter 6, Adequate Sites</i>.</p> <p>The updated Housing Element includes a program to waive lot consolidation fees for projects that provide very and extremely low-income housing units (Program H4.3).</p>

TABLE D-3. EVALUATION OF 2015-2023 HOUSING ELEMENT PAST PERFORMANCE

Program No./Name	Description and Objective	Timeframe and Achievements	Recommendation
2.6 Second Units	<p>Action 1: Modify the Second Dwelling Unit zoning requirements and permitting process to facilitate the development of new second dwelling units.</p> <p>Action 2: Develop a Second Unit Legalization Program, which would potentially provide incentives to legalize non-recognized second units.</p> <p>Action 3: Analyze existing secondary dwelling unit ordinance to ensure compliance with State law, and update the zoning ordinance as necessary.</p>	<p>Actions 1 and 3: Completed.</p> <p>The City adopted modifications to the zoning ordinance and streamlined the processing time for second dwelling units. A corresponding increase in production of accessory dwelling units has followed.</p> <p>Action 2: The City was awarded \$160,000 of SB2 Planning Grant Program funds; the grant application specified that a portion of the funds could be utilized to promote ADU production/legalization, including consideration of an amnesty program.</p> <p><u>Effectiveness</u>: Program has been effective in developing new ADUs.</p> <p><u>Appropriateness</u>: Ongoing need for this activity; additional modifications will help strengthen resources available to facilitate development.</p> <p><u>Quantification</u>: From 2017 through 2022, Belmont issued building permits for 74 new accessory dwelling units.</p> <p><u>Special Needs Analysis</u>: ADUs often provide naturally affordable units that are smaller in size and more accessible to renters.</p>	<p>Revised programs are proposed that incentivize ADU development during the next planning period through a series of targeted actions (Programs H5.9, H5.10, H5.11, and H5.12).</p>

TABLE D-3. EVALUATION OF 2015-2023 HOUSING ELEMENT PAST PERFORMANCE

Program No./Name	Description and Objective	Timeframe and Achievements	Recommendation
2.7 Promotion of Small Lot Development	<p>Action 1: Consider allowing development standards to be modified for small lots, rather than requiring applicants to apply for a variance or a zone change, if projects can demonstrate that they comply with design guidelines and do not cause substantial adverse impacts on adjoining properties.</p> <p>Action 2: Consider working with affordable housing developers and/or management companies to manage groups of smaller housing developments in order to create economies of scale and support affordable housing development.</p>	<p>Action 1: December 2015. No activity to report.</p> <p>Action 2: December 2017. No activity to report.</p> <p>No specific activity to report on either action.</p> <p><u>Effectiveness</u>: Program has been moderately effective, since small lot consolidation has not been a significant constraint in Belmont.</p> <p><u>Appropriateness</u>: Lot consolidation has reduced reliance on development of stand-alone small lots. No longer needed.</p> <p><u>Quantification</u>: Small lot consolidation has facilitated development of five multi-family housing projects and 613 new multi-family housing units.</p> <p><u>Special Needs Analysis</u>: No information on special needs is available for this program.</p>	<p>Remove prior actions. Following adoption of the Belmont Village Specific Plan and creation of the Corridor Mixed Use (CMU) Zoning district, the City has seen a significant decrease in request for variances and zoning changes because the new zoning regulations are flexible and allow for mixed-use development activity in the priority development areas.</p> <p>A new program has been included to waive lot consolidation fees for projects that provide very- and extremely low-income housing units (Program H4.3).</p>
2.8 El Camino Real Transit Corridor	<p>Action 1: Adopt zone texts amendments for properties along the El Camino Real transit corridor to facilitate mixed-use and development of a variety of housing types, and allowing up to 45 dwelling units per acre when certain design criteria are met.</p> <p>Action 2: Consider modifying the zoning requirement for a Conditional Use Permit for all multi-family development projects.</p>	<p>Action 1: Completed. Adopted Nov. 2017</p> <p>Action 2: Completed. Adopted December 2016.</p> <p><u>Effectiveness</u>: Program has been effective in creating greater opportunities for higher-density multi-family developments.</p> <p><u>Appropriateness</u>: As these actions are completed, no further need.</p> <p><u>Quantification</u>: no quantifiable activity to report.</p> <p><u>Special Needs Analysis</u>: High-density zoning standards have helped facilitate an increase in housing development activity which continues to generate new inclusionary affordable housing units.</p>	<p>Remove; completed.</p>

TABLE D-3. EVALUATION OF 2015-2023 HOUSING ELEMENT PAST PERFORMANCE

Program No./Name	Description and Objective	Timeframe and Achievements	Recommendation
2.9 Belmont General Plan Update	<p>Action 1: Prepare and Adopt update to Belmont General Plan 2035.</p> <p>Action 2: Prepare and adopt Program Environmental Impact Report that analyzing forecasting development within the Belmont Village Priority Development Area and along the El Camino Real corridor.</p>	<p>Action 1: Completed. Adopted November 2017.</p> <p>Action 2: Completed. Adopted November 2017.</p> <p><u>Effectiveness</u>: Program has been effective in implementing zoning text amendments.</p> <p><u>Appropriateness</u>: As these actions are completed, no further need.</p> <p><u>Quantification</u>: Since the General Plan and EIR were adopted in 2017, seven multi-family housing projects have been able to tier off the previously completed environmental review (CEQA exemptions of Addendum to the General Plan EIR), resulting in expedited development review of 789 new housing units.</p> <p><u>Special Needs Analysis</u>: No information on special needs is available for this program.</p>	Remove; completed.

TABLE D-3. EVALUATION OF 2015-2023 HOUSING ELEMENT PAST PERFORMANCE

Program No./Name	Description and Objective	Timeframe and Achievements	Recommendation
2.10 Update Residential Development Standards	<p>Action 1: By Spring 2015, adopt zone text amendments amending residential development standards and design review thresholds.</p> <p>Action 2: By Summer 2015, adopt revisions to the Belmont Tree Ordinance.</p>	<p>Action 1: Completed. Adopted 2015 and 2016. The City adopted comprehensive modifications to residential design standards and the design review process, making it easier for residents to make improvements to existing housing stock, and increasing the number of new dwelling proposed on the few remaining vacant sites.</p> <p>Action 2: Completed. Adopted Nov 2017.</p> <p><u>Effectiveness:</u> Program has been effective in implementing new development standards.</p> <p><u>Appropriateness:</u> As these actions are completed, no further need.</p> <p><u>Quantification:</u> In addition to 41 new single-family residential homes being built during the current planning period, Belmont has processed 271 single-family design review applications under the City's recently adopted tiered residential design review standards that allow more building additions and remodels to be approved by the zoning administrator in a streamlined timeframe.</p> <p><u>Special Needs Analysis:</u> No information on special needs is available for this program.</p>	Remove; completed.

TABLE D-3. EVALUATION OF 2015-2023 HOUSING ELEMENT PAST PERFORMANCE

Program No./Name	Description and Objective	Timeframe and Achievements	Recommendation
Goal 3: Expand and protect housing opportunities for all economic segments and special needs groups within the community.			
3.1 Mortgage Credit Certificate	Action 1: Actively educate prospective buyers about the program by distributing materials, posting materials on the City website, and meeting with realtors and homebuilders.	<p>Action 1: Ongoing. The City of Belmont, in partnership with HEART of San Mateo County, hosted a first-time homebuyer workshop in April 2019. Options for first-time and low-income homebuyers was distributed and posted to the City's Website.</p> <p><u>Effectiveness:</u> Program has been effective in helping residents learn about housing opportunities.</p> <p><u>Appropriateness:</u> Ongoing need for this activity.</p> <p><u>Quantification:</u> The City hosted one first-time homebuyer workshop.</p> <p><u>Special Needs Analysis:</u> No information on special needs is available for this program.</p>	The City will continue to partner with HEART to promote home ownership opportunities and programs. Program H3.1 commits the City to hosting first-time homebuyer workshops during the next planning period.

TABLE D-3. EVALUATION OF 2015-2023 HOUSING ELEMENT PAST PERFORMANCE

Program No./Name	Description and Objective	Timeframe and Achievements	Recommendation
3.2 Section 8 Rental Assistance	<p>Action 1: Set up a meeting between City and County staff members responsible for the Section 8 program so that City staff become better educated about the opportunities available through the program.</p> <p>Action 2: Publicize Section 8 by posting information about the program on the City’s website and make information available at the Permit Center.</p> <p>Action 3: Encourage new housing developers and management companies to participate in the Housing Choices Voucher Program or the Project-based Program during preparation of future development agreements or affordable housing programs.</p>	<p>Action 1: Completed and ongoing. The City has established a line of communication with the County to ensure Belmont Affordable Housing projects are considered for project-based vouchers. So far two projects have been awarded vouchers.</p> <p>Action 2: Ongoing. No specific activity to report.</p> <p>Action 3: Completed and ongoing. The City has partnered with two affordable housing developers for two City-owned project sites to building over 100 affordable housing units. In 2019 both developers were awarded project-based vouchers from San Mateo County Department of Housing.</p> <p><u>Effectiveness:</u> Program has been effective in helping residents learn about housing opportunities through the Section 8 program.</p> <p><u>Appropriateness:</u> Ongoing need for this activity; modifications will help strengthen the ability to reach more people about the requirements.</p> <p><u>Quantification:</u> Two affordable housing projects in Belmont have been awarded project-based vouchers that will help support lower-income households.</p> <p><u>Special Needs Analysis:</u> Project based vouchers will support lower-income households.</p>	<p>Retain updated program. The Housing Element includes Program H5.1 focused on improving access to housing information to address the lack of access to information about fair housing rights, including Section 8 program information and rules.</p>

TABLE D-3. EVALUATION OF 2015-2023 HOUSING ELEMENT PAST PERFORMANCE

Program No./Name	Description and Objective	Timeframe and Achievements	Recommendation
3.3 Non-profit Assistance	<p>Action 1: Continue to provide financial assistance to community service organizations such as HIP Housing, when financially appropriate.</p> <p>Action 2: Publicize the programs through its website, and flyers at the permit center and senior and community center.</p>	<p>Actions 1 and 2: Completed and ongoing.</p> <p>The City continues to provide direct financial assistance to HIP Housing and has met with Project Sentinel representatives to help promote their housing services to residents. The City Website now includes links to various housing nonprofit organizations.</p> <p><u>Effectiveness:</u> Program has been effective in targeting assistance to nonprofits.</p> <p><u>Appropriateness:</u> Ongoing need for this activity.</p> <p><u>Quantification:</u> During the current housing element planning period, Belmont contributed \$40,000 to HIP Housing to support administration of their Home Sharing program and other housing programs targeting lower-income households in the City of Belmont.</p> <p><u>Special Needs Analysis:</u> Both HIP Housing and Project Sentinel provide programming and outreach to special needs populations, including households at risk of homelessness.</p>	<p>Ongoing; the City will continue to provide financial resources and/or program outreach support to HIP Housing, HEART, Project Sentinel, and other housing organizations that support special needs groups or lower-income households.</p>

TABLE D-3. EVALUATION OF 2015-2023 HOUSING ELEMENT PAST PERFORMANCE

Program No./Name	Description and Objective	Timeframe and Achievements	Recommendation
3.4 HEART	<p>Action 1: Continue to participate in HEART, or other comparable programs.</p> <p>Action 2: Actively publicize the revolving affordable housing loan program and First-time Homebuyers loan program available through HEART.</p>	<p>Action 1: Completed and ongoing. The City is an active participant in HEART and provides an annual member agency contribution.</p> <p>Action 2: Completed. The City of Belmont hosted a HEART First Time Homebuyer workshop in April 2019.</p> <p><u>Effectiveness:</u> Program has been effective in targeting assistance to nonprofits.</p> <p><u>Appropriateness:</u> Ongoing need for this activity.</p> <p><u>Quantification:</u> The City partnered with HEART to host one first-time homebuyer workshop during the current planning period.</p> <p><u>Special Needs Analysis:</u> No information on special needs is available for this program.</p>	<p>Ongoing, the city will continue to be a HEART member agency and the Housing Element includes a new program to partner with stakeholders, including HEART, to offer first time homebuyer workshops in Belmont (Program H3.1).</p>
3.5 Emergency Shelters	<p>Action 1: Develop a partnership with Shelter Network to support their efforts to house homeless families and individuals.</p> <p>Action 2: Review Emergency Shelter zoning regulations for ongoing compliance with state law (annually).</p>	<p>Action 1: Ongoing. No specific activity to report.</p> <p>Action 2: Completed and ongoing. The city ensures ongoing compliance.</p> <p><u>Effectiveness:</u> Program has been effective ensuring the City complies with the requirements to allow emergency shelters.</p> <p><u>Appropriateness:</u> Ongoing need for this activity; modifications will update to include low-barrier navigation centers.</p> <p><u>Quantification:</u> No quantifiable activity to report.</p> <p><u>Special Needs Analysis:</u> No information on special needs is available for this program during the previous planning period.</p>	<p>Retain updated program to update the Zoning Ordinance to define low-barrier navigation centers and allow them in the same zones where emergency shelters are permitted (Program H4.1).</p>

TABLE D-3. EVALUATION OF 2015-2023 HOUSING ELEMENT PAST PERFORMANCE

Program No./Name	Description and Objective	Timeframe and Achievements	Recommendation
Goal 4: Where appropriate, mitigate unnecessary governmental constraints to the maintenance, improvement, and development of housing.			
4.1 Special Needs and Extremely Low-Income Housing	<p>Action 1: Amend the Zoning Ordinance to remove the R-5 Zoning District. Any uses that are currently permitted in the R-5 District may be permitted in an alternative district.</p> <p>Action 2: Ensure that information related to zoning for special needs housing is available at the Permit Center and on the City of Belmont website.</p> <p>Action 3: Work with special needs housing service providers to develop incentives for development of extremely low-income housing such as expedited processing, zoning exceptions that provide certain financial relief, and supporting applications for grant or other funding opportunities.</p> <p>Action 4: The City shall reach out annually to developers of supportive housing to encourage development of project targeted for persons with disabilities, including persons with developmental disabilities.</p>	<p>Action 1: Completed November 2017.</p> <p>Action 2: Ongoing. Permit Center was remodeled to provide an ADA compliance permitting experience; required information on ADA zoning available at permit center.</p> <p>Action 3: Ongoing and completed. Mid-Pen Housing built 22 very low-income units in the Firehouse Square project on City Housing Successor owned property. Hill St/El Camino Real Affordable Housing Project (on City Housing Successor owned property) will provide 22 very-low-income units, and in June 2022 the City authorized application for SB 35 streamlined review.</p> <p>Action 4: Annual, ongoing, and completed; Two pending City-owned Affordable Housing projects must provide a minimum 5% of units to special needs populations, a trend which will continue.</p> <p><u>Effectiveness:</u> Program has been moderately effective in targeting assistance groups with special needs and extremely low-income households.</p> <p><u>Appropriateness:</u> Ongoing need for this activity; modifications will strengthen ways to address the housing needs of special needs groups.</p> <p><u>Quantification:</u> The City has permitted 76 very low-income housing units during the current planning period.</p> <p><u>Special Needs Analysis:</u> The City has successfully provided land and funding resources to projects that include both very low-income units and units set aside for special needs populations, including households at risk of homelessness. More programming needed during the next planning period to reach other special needs populations.</p>	<p>Update. The Housing Element includes programs targeted towards supporting development of housing for special needs groups (Programs H5.10 and H5.11,).</p>

TABLE D-3. EVALUATION OF 2015-2023 HOUSING ELEMENT PAST PERFORMANCE

Program No./Name	Description and Objective	Timeframe and Achievements	Recommendation
4.2 Transfer of Development Rights	<p>Action 1: Continue to allow the transfer of development rights or floor area within the San Juan Area.</p> <p>Action 2: Consider the feasibility of amending the transfer of development rights program to allow development rights to be transferred from the hillside areas to priority development areas.</p>	<p>Action 1: Completed and ongoing. Continued compliance in transfer of rights.</p> <p>Action 2: Ongoing. No specific activity to report.</p> <p><u>Effectiveness</u>: Program has been moderately effective creating additional opportunities for new development.</p> <p><u>Appropriateness</u>: With proposed changes to remove the density metric from the zoning code, there is no further need for this activity.</p> <p><u>Quantification</u>: no quantifiable activity to report.</p> <p><u>Special Needs Analysis</u>: No information on special needs is available for this program.</p>	<p>Remove; this program is no longer needed to facilitate more housing growth in the City’s priority development area.</p>

TABLE D-3. EVALUATION OF 2015-2023 HOUSING ELEMENT PAST PERFORMANCE

Program No./Name	Description and Objective	Timeframe and Achievements	Recommendation
4.3 Density Bonus Program	<p>Action 1: Implement the Density Bonus Program as follows:</p> <ul style="list-style-type: none"> ▪ Develop a Density Bonus information website and program materials and/or handouts. ▪ Provide information materials to all potential target site and El Camino Real corridor developers. 	<p>Completed and ongoing. The Density Bonus section of the Zoning Ordinance is available on the City Website, City staff have engaged in numerous discussions with housing developers to implement Density Bonus opportunities; the Hill Street/El Camino Real Affordable Housing Project on City-owned property received a density bonus in 2020.</p> <p><u>Effectiveness:</u> Program has been effective creating additional opportunities for new development.</p> <p><u>Appropriateness:</u> Ongoing need to provide opportunity to use density bonus, and with proposed modifications it will strengthen opportunities to address the needs of special needs groups.</p> <p><u>Quantification:</u> Belmont approved five multi-family residential housing projects that took advantage of State and local density bonus provisions in order to achieve higher project densities. The City is reviewing three additional housing projects that include a density bonus component.</p> <p><u>Special Needs Analysis:</u> Nearly all housing development projects during the previous planning period took advantage of a density bonus in exchange for provision of affordable housing units. A majority of these units were low-income; an updated density bonus program in the next planning period will strengthen opportunities to support lower-income households and special needs group.</p>	<p>The Housing Element includes a program to monitor and analyze the interrelationship between the zoning standards, objective design standards, and State Density Bonus to identify and remove constraints to housing development (Program H4.5).</p>

TABLE D-3. EVALUATION OF 2015-2023 HOUSING ELEMENT PAST PERFORMANCE

Program No./Name	Description and Objective	Timeframe and Achievements	Recommendation
4.4 Development Review Process	<p>Action 1: Ensure that the development process complies with State law. This will entail:</p> <ul style="list-style-type: none"> ▪ Eliminating any time used to determine the level of environmental review for secondary dwelling units, as these are generally CEQA-exempt; ▪ Capping the number of days needed to act on a CEQA-exempt single-family unit permit application to 60 days; and, ▪ Capping the number of days needed to act on a multi-family permit application that requires an EIR to 180 days (90 days if the project requires an EIR and at least 49% of the units are affordable), and 60 days if the project requires a Negative Declaration or is CEQA-exempt. <p>Action 2: Adopt design guidelines for multi-unit and mixed-use development projects.</p>	<p>Action 1: Completed and ongoing. Planners ensure ongoing compliance with all applicable CEQA processing times.</p> <p>Action 2: Completed and ongoing. BVSP and Corridor Mixed Use (CMU) zoning for El Camino Real corridor both adopted in November 2017 and include updated design guidelines that provide clarity in the development review process.</p> <p><u>Effectiveness:</u> Program has been effective ensuring the City complies with development review requirements.</p> <p><u>Appropriateness:</u> Ongoing need for this activity; modifications will add new compliance measures pertaining to SB 35, SB 330 and others.</p> <p><u>Quantification:</u> The City approved its first SB 35 eligible project in February 2023.</p> <p><u>Special Needs Analysis:</u> No information on special needs is available for this program.</p>	<p>A new program has been included to ensure information and materials related to streamlined development review options (SB 35) are available on the City website and at City Hall, and that staff are prepared to implement streamlined review (Program H4.6).</p>
4.5 Planned Development	<p>Action 1: Continue to allow Planned Development zoning.</p>	<p>Action 1: Completed and ongoing. No specific activity to report.</p> <p><u>Effectiveness:</u> Program has been effective allowing Planned Development Zoning.</p> <p><u>Appropriateness:</u> Ongoing need for this activity.</p> <p><u>Quantification:</u> no quantifiable activity to report.</p> <p><u>Special Needs Analysis:</u> No information on special needs is available for this program.</p>	<p>Ongoing.</p>

TABLE D-3. EVALUATION OF 2015-2023 HOUSING ELEMENT PAST PERFORMANCE

Program No./Name	Description and Objective	Timeframe and Achievements	Recommendation
4.6 Parking	<p>Action 1: Consider amending the Zoning Ordinance to reduce parking requirements for multi-family residential and mixed-use projects (for example, reduce the studio unit parking requirement from 2 spaces per unit to 1 space per unit).</p> <p>Action 2: Develop shared parking strategies as part of the Belmont Village Implementation Plan and evaluate the feasibility of establishing parking districts within the Belmont Village area to fund shared parking infrastructure.</p>	<p>Action 1 and 2. Both Completed.</p> <p>The BVSP and the General Plan Phase I Zoning (adopted November 2017) allow for shared parking serving more than one use when certain criteria are met, and reduced parking in exchange for community benefits. Overall parking requirements for mixed use projects were reduced.</p> <p><u>Effectiveness:</u> Program has been effective in reducing parking requirements as a constraint.</p> <p><u>Appropriateness:</u> As these actions are complete, there is no longer a need for them.</p> <p><u>Quantification:</u> All affordable housing projects entitled during the previous planning period allowed reduced parking standards either as part of a density bonus waiver or community benefit zoning incentive.</p> <p><u>Special Needs Analysis:</u> No information on special needs is available for this program.</p>	Remove, completed.

TABLE D-3. EVALUATION OF 2015-2023 HOUSING ELEMENT PAST PERFORMANCE

Program No./Name	Description and Objective	Timeframe and Achievements	Recommendation
4.7 Multi-Family Development	Action 1: When multi-family residential and mixed-use development design guidelines are adopted, amend the Zoning Ordinance to remove the conditional use permit requirement for multi-family development projects in high-density residential or mixed-use zones.	Action 1: The Belmont Village zoning districts and the Corridor Mixed Use zoning district, both adopted in 2017, allow multi-family residential housing development by right (no CUP) when not located on the ground floor. In 2020 the City amended the Zoning Ordinance to remove the CUP requirement for multi-family housing in the R-3 and R-4 zoning districts. <u>Effectiveness:</u> Program has been effective in removing the conditional use permit as a constraint. As detailed in the Housing Constraints section, five multi-family housing development projects were approved with a CUP entitlement without significant financial or development review time impacts. The CUP continues to be a tool for ensuring projects meet ongoing operational and maintenance obligations. <u>Appropriateness:</u> As these actions are complete, there is no longer a need for them. <u>Quantification:</u> no quantifiable activity to report. <u>Special Needs Analysis:</u> No information on special needs is available for this program.	Remove; completed.

TABLE D-3. EVALUATION OF 2015-2023 HOUSING ELEMENT PAST PERFORMANCE

Program No./Name	Description and Objective	Timeframe and Achievements	Recommendation
<i>Goal 5: Ensure fair and equal housing opportunity for all persons regardless of race, religion, sex, marital status, family type, ancestry, national origin, color, or other protected status.</i>			
5.1 Fair Housing Program	<p>Action 1: Publicize the Peninsula Conflict-Resolution Center (PCRC) at the permit center.</p> <p>Action 2: Provide program support to PCRC and other fair housing nonprofit organizations, such as Project Sentinel.</p>	<p>Actions 1 and 2: Completed and ongoing.</p> <p>Belmont staff has met with PCRC and Project Sentinel staff and promotes their services to residents when appropriate.</p> <p><u>Effectiveness</u>: Program has been moderately effective in targeting assistance to groups with special needs and extremely low-income households.</p> <p><u>Appropriateness</u>: Ongoing need for this activity; modifications will strengthen ways to address the fair housing needs of special needs groups.</p> <p><u>Quantification</u>: no quantifiable activity to report.</p> <p><u>Special Needs Analysis</u>: City staff were able to connect Belmont residents with organizations supporting special needs housing.</p>	<p>The Housing Element includes partnering with Project Sentinel to provide fair housing training for landlords and tenants every two years (Program H5.5).</p>
5.2 Housing for the Disabled	<p>Action 1: Continue to offer program support to the Center for Independence of the Disabled (CID) to provide housing accessibility modifications for the disabled in Belmont.</p> <p>Action 2: Post information on the city website regarding housing opportunities for the disabled, including persons with developmental disabilities, and a link to the County's website for additional housing options.</p> <p>Action 3: Provide clear information on the City's website and at the Permit Center related to the City's reasonable accommodation ordinance that provides exceptions in zoning and land-use for housing for persons with disabilities, including persons with developmental disabilities.</p> <p>Action 4: By December 2015, the City shall review the Reasonable Accommodation Ordinance to ensure ongoing compliance with state law.</p>	<p>All Actions: Completed and ongoing. No specific activity to report.</p> <p><u>Effectiveness</u>: Program has been moderately effective in targeting assistance to groups with special needs and extremely low-income households.</p> <p><u>Appropriateness</u>: Ongoing need for this activity; modifications will strengthen ways to address the housing needs of special needs groups.</p> <p><u>Quantification</u>: no quantifiable activity to report.</p> <p><u>Special Needs Analysis</u>: City staff were able to connect Belmont residents with organizations supporting special needs housing.</p>	<p>Update. The Housing Element includes programs targeted towards supporting development of housing for special needs groups (Programs H5.10 and H5.11,).</p>

TABLE D-3. EVALUATION OF 2015-2023 HOUSING ELEMENT PAST PERFORMANCE

Program No./Name	Description and Objective	Timeframe and Achievements	Recommendation
<i>Goal 6: Promote the conservation of natural resources throughout the Belmont community.</i>			
6.1 Promote Energy Conservation	<p>Action 1: Adopt Conservation Element of the Belmont General Plan 2035.</p> <p>Action 2: Continue to participate in the PG&E Sustainable Solutions Turnkey program and implement the audit identified energy conservation projects.</p> <p>Action 3: Provide program outreach and support, as needed, to Energy Conservation programs such as Peninsula Sunshares, Bay Rea Regional Energy Network (BayREN), and other state or federal programs promoting residential energy conservation.</p> <p>Action 4: Review the zoning ordinance to improve solar access provisions.</p>	<p>Action 1: Completed.</p> <p>Action 2: Completed and ongoing.</p> <p>Action 3: Completed and ongoing. The City participated in Peninsula SunShares, and authorized three additional PACE financing program administrators to operate in Belmont for installing clean energy improvements.</p> <p>Action 4: No specific activity to report.</p> <p><u>Effectiveness</u>: Program has been effective promoting energy conservation.</p> <p><u>Appropriateness</u>: Ongoing need for this activity.</p> <p><u>Quantification</u>: no quantifiable activity to report.</p> <p><u>Special Needs Analysis</u>: No information on special needs is available for this program.</p>	<p>Ongoing. The City continues to implement the Climate Action Plan, and to adopt new reach building codes to promote sustainable construction.</p>
6.2 Support On-Site Alternative Energy Generation	<p>Action 1: Adopt guidelines to encourage on-site solar energy systems.</p> <p>Action 2: Provide informational brochures about solar energy systems and available financial resources at the permit center.</p> <p>Action 3: Consider using City solar farms as demonstration projects for residents to learn more about solar energy.</p> <p>Action 4: Participate in the Peninsula SunShares group photovoltaic buy-in program.</p>	<p>No specific activity to report on any actions. The city adopted a Climate Action Plan in November 2017 and is working on implementation. The City is working to install vehicle battery charging stations on City property.</p> <p><u>Effectiveness</u>: Program has been effective promoting energy conservation.</p> <p><u>Appropriateness</u>: Ongoing need for this activity.</p> <p><u>Quantification</u>: no quantifiable activity to report.</p> <p><u>Special Needs Analysis</u>: No information on special needs is available for this program.</p>	<p>Ongoing. The City standard conditions of approval and General Plan EIR mitigation measures include requirements to promote alternative energy generation when possible.</p>

TABLE D-3. EVALUATION OF 2015-2023 HOUSING ELEMENT PAST PERFORMANCE

Program No./Name	Description and Objective	Timeframe and Achievements	Recommendation
6.3 Promote Water Conservation	<p>Action 1: Adopt guidelines to encourage low-water landscaping.</p> <p>Action 2: Provide informational brochures about drought-resistant and low-water landscaping options that are specific to Belmont’s geography and native habitats.</p>	<p>Ongoing. The City actively promotes the Department of Water Resources Model Water Efficient Landscape Ordinance for all development activity.</p> <p><u>Effectiveness</u>: Program has been effective promoting conservation.</p> <p><u>Appropriateness</u>: Ongoing need for this activity.</p> <p><u>Quantification</u>: no quantifiable activity to report.</p> <p><u>Special Needs Analysis</u>: No information on special needs is available for this program.</p>	Ongoing.
6.4 Adequate Water and Sewer Services	<p>Action 1: Deliver the adopted Housing Element to the Mid-Peninsula Water District and Silicon Valley Clean Water within one month of adoption.</p> <p>Action 2: Provide information on the City website about the adopted sewer priority policy for affordable housing projects.</p>	<p>Action 1: Completed (adopted June 2015).</p> <p>Action 2: Completed; Sewer Priority Policy available on the City Website.</p> <p><u>Effectiveness</u>: Program has been effective in communicating information.</p> <p><u>Appropriateness</u>: Ongoing need for this activity.</p> <p><u>Quantification</u>: no quantifiable activity to report.</p> <p><u>Special Needs Analysis</u>: No information on special needs is available for this program.</p>	Ongoing. The Belmont Housing Element will be delivered to all agencies impacted by housing growth, including the water district.
6.5 Update the General Plan	<p>Action 1: Update the City of Belmont General Plan to integrate land use and transportation planning.</p>	<p>Completed (adopted November 2017).</p> <p><u>Effectiveness</u>: Program has been effective in updating the General Plan.</p> <p><u>Appropriateness</u>: As these actions are complete, there is no longer a need for them.</p> <p><u>Quantification</u>: no quantifiable activity to report.</p> <p><u>Special Needs Analysis</u>: Considerations and accommodations for special needs populations are included in the Goals and Policies in the General Plan.</p>	Remove; completed.

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APPENDIX E: OUTREACH

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I. COMMUNITY OUTREACH SUMMARY

The Housing Element is an important document that will shape the future of our community. Therefore, it is important that it reflects the vision of the people who make the City of Belmont special. To accomplish this, Belmont developed and implemented an outreach plan designed to reach as many community members who live and work here as possible. For some of the community outreach activities, Belmont partnered with other San Mateo County jurisdictions for a first-of-its-kind Countywide outreach effort through an award-winning collaboration called 21 Elements. A summary of public participation and community outreach activities and key takeaways are included below.

I.1 WEBSITE AND SOCIAL MEDIA SUMMARY

- Belmont developed a City webpage at www.belmont.gov/housingelement to host all information and resources related to the Housing Element update. The webpage hosted an archive of past Belmont Housing Elements, recordings and other materials from community engagement activities, and multiple ways for people to provide feedback, including a virtual sites map. The City website's homepage also included a banner linking visitors to the Housing Element webpage.
- Belmont participated in and helped shape the "Let's Talk Housing" regional housing collaboration. Let's Talk Housing developed a Countywide website available in five languages, a Belmont webpage (www.letstalkhousing.org/belmont) detailing the City's timeline, engagement activities, and resources that also linked to the Belmont website, videos about the process in several languages, and a social media presence. As of February 2022, the website has been visited more than 17,000 times, with more than 20% from mobile devices.
- Belmont created a dedicated e-notification list to keep interested parties informed about the Housing Element update process.
- Belmont utilized a variety of social media platforms to inform the community about the Housing Element update process and to solicit community survey responses.

I.2 COMMUNITY MEETINGS

Belmont participated in several housing meetings and webinars in partnership with 21 Elements, including the following.

- **Introduction to the Housing Element** – A housing element overview with breakout discussion rooms that was part of a series of introductory meetings attended by more than 1,000 community members countywide.

- **All About RHNA** – A webinar offering a deep dive into the RHNA allocation process and the opportunity sites methodology.
- **Stakeholder Listening Sessions** – Four meetings where staff from all County jurisdictions could listen to and hold breakout discussions with housing stakeholder groups arranged by topic. More than 30 groups participated.
- **Creating an Affordable Future** – A four-part webinar series to help educate community members about local housing issues.

In addition, the City of Belmont coordinated and hosted several public meetings to review components of the Housing Element update. All the following meetings' recordings and materials can be found on the City's Housing Element webpage.

- **Affirmatively Furthering Fair Housing Workshop (March 23, 2022)** – A virtual community meeting to review AFFH and new Housing Element requirements.
- **Housing Element Community Workshop (June 27, 2022)** – A highly-attended virtual meeting to review the Housing Element update and the connection between housing growth and transportation, parks, and other land use planning efforts within the city.

1.3 OTHER OUTREACH STRATEGIES

- **Community Postcard Mailer #1** – Direct postcard mailer in March 2022 to all residential units in Belmont introducing the Housing Element update, promoting the online AFFH survey, and promoting the March AFFH Community Workshop. The postcard was also distributed at the Belmont Library and Twin Pines Senior and Community Center; invitation for comments in Spanish included.
- **AFFH Fair Housing Online Survey** – To gather insight on community needs and priorities. Survey link provided in direct postcard mailer to all residential units in Belmont and shared on social media (Facebook, NextDoor, Instagram, and Twitter), the City website, the Citywide Weekly Update community email, and citywide utility bill insert mailer. The survey was made available in English, Spanish, simplified Chinese, Tagalog, and Vietnamese, receiving 174 survey responses.
- **Community Postcard Mailer #2** – Direct postcard mailer to all residential units advertising where to find the draft Housing Element and Environmental Impact Review (EIR) and promoting the June community housing workshop. The postcard was also distributed at the Belmont Library and Twin Pines Senior and Community Center; invitation for comments in Spanish included.
- **Citywide Utility Bill Inserts** – The City designed and distributed an informational flyer with the quarterly municipal sewer utility bill that included information about the Housing Element Update, a short URL link to the AFFH Fair Housing Survey, the Housing Element web address, and a housing email address for people to provide comments.

- **Equity Advisory Group** – Belmont supported an Equity Advisory Group with 21 Elements to ensure outreach was structured to meet with stakeholders where they were at as much as possible.

It is more important than ever to include as many voices as possible in the Housing Element. Housing Elements, at their best, provide an opportunity for everyone to add their voice to the conversation. However, too often, many people are left out of the process. Renters, workers, young families, youth, people of color, immigrants, refugees, non-English speakers, and people with disabilities are often unable to participate in outreach activities when scheduled, don't know how to get involved, or don't trust the process. Our goal was to change that. Specifically, we did the following.

- Ensured opportunities were available to receive information and provide feedback in multiple languages, offering direct foreign language translation services by request.
- Designed a website that was mobile friendly, with accessibility features and in multiple languages (lower-income residents, young adults, and people of color are more likely to use their phones).
- Participated in an Equity Advisory Group consisting of 18 organizations across San Mateo County that provided feedback on outreach and materials, and shared information about the Housing Element update and how to participate in the process with the communities they serve.
- Launched an Affirmatively Furthering Fair Housing Survey that received 174 responses.

1.4 KEY TAKEAWAYS

Below is a summary of key takeaways that emerged throughout the outreach process.

- **Housing is personal.** People often have differing views on housing because it is a very personal issue tied to feelings of safety, belonging, and identify. Often, comments reflected people's current housing situation. Those with safe, stable housing that they can afford were more concerned with potential change. Those without were generally more interested in bolder policies and more housing. Throughout the outreach process, many people shared meaningful stories of being priced out of their communities or of their children not being able to live in the community where they grew up.
- **The price of housing is a major concern.** Through survey responses and people who spoke during community meetings, many Belmont residents voiced concerns about the high cost of renting or buying a home today, either for themselves, friends, or family. It is an issue that touches many lives.
- **More housing is needed.** Generally, participants agreed that Belmont needs more housing, particularly affordable housing. However, there were diverging views on how to accomplish this, where housing should go, and what it should look like.

- **Single-family neighborhoods are polarizing.** While some people voiced their interest in up-zoning sites near single-family neighborhoods, most Belmont homeowners wanted to protect single-family neighborhoods and the property investments they had made.
- **Affordable housing is a top concern.** Many felt that more needed to be done to promote affordable housing. They also felt developers should be eligible for incentives and opportunities that make them more competitive.
- **Better information resources.** People wanted to know how to find affordable housing in their communities and navigate the process of applying for it.
- **Issues are connected.** Transportation, infrastructure like storm and sewer facilities, adequate park and recreational space, climate change, and access to living wage jobs and education opportunities are all tied to housing and quality of life. These issues are not siloed in people's lives and there is a desire to address them in interconnected ways. The June 2022 community workshop included Belmont staff from Housing, Planning, Public Works, and Parks and Recreation to provide comprehensive information about housing growth in Belmont.
- **Regional input matters, but there's more to figure out.** Building a broader sense of community and sharing resources at the countywide level was valuable. However, it was more important to this process to engage non-resident community members on jurisdiction-specific input. The City will continue to utilize some of the Housing Element engagement strategies for future community engagement efforts to insure inclusion in outreach.
- **Diversity in participation was a challenge.** Despite partnering with organizations to engage with the hardest to reach communities and providing multilingual outreach, achieving diversity in participation was challenging. In the wake of the COVID-19 pandemic, organizations already operating on limited resources were focused on supporting more immediate needs, while the added stresses of life coupled with the digital divide added additional barriers for many.

1.5 WHAT WE ACCOMPLISHED

Belmont developed a diverse outreach plan to hear from as many community members as possible. The following provides a more detailed summary of Belmont's community engagement activities related to the RHNA 6 Housing Element update process.

WEBSITE AND SOCIAL MEDIA

As a starting point for accomplishing extensive outreach, Belmont developed a clear online presence with all the information needed to understand the update process and know how to participate.

- **Belmont webpage and social media communications.** Belmont has invested significant resources and staffing in the last few years to modernize our digital communication

strategies and better reach community stakeholders. Specifically for the Housing Element update, Belmont developed a City webpage (www.belmont.gov/housingelement) to host all information and resources related to the Housing Element update. The webpage hosted an archive of past Belmont Housing Elements, recordings and materials from all community engagement activities, and multiple ways for people to provide feedback, including a virtual housing opportunity sites map. The City's main homepage also included a banner directly linking visitors to the Housing Element webpage. The webpage was mobile-friendly, with accessibility features. As part of this communications redesign, Belmont also utilized a variety of social media platforms, in addition to more traditional email newsletters, to put out information related to the Housing Element update. All community engagement activities, including meetings, workshops, and online surveys were heavily advertised on all social media channels (NextDoor being the most heavily used, plus Facebook, Twitter, Instagram, and LinkedIn). The Citywide Weekly Update community email, issued every Friday, reaches many community members and regularly featured information on the Housing Element update process. During the public comment period in particular, the City sent out regular digital communications and reminders to the community.

- **Let's Talk Housing website.** To reach a broader audience and supplement Belmont's Housing Element webpage, the City joined the 21 Elements group in launching the "Let's Talk Housing" website in March 2021. Our 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 including accessibility features. As part of this effort, a Belmont-specific information page was created with our proposed timeline, information on engagement activities, and resources that were also linked to the City website. 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 on the Housing Element Update (see below), Belmont supported 21 Elements in developing shorter, four-minute snippets to ensure information was more accessible and less onerous than watching an hour-long meeting. Two videos were produced in Arabic, Chinese, English, Spanish, and Tagalog: "What is a Housing Element and How it Works" and "Countywide Trends and Why Housing Elements Matter." The videos were made available on the Let's Talk Housing YouTube channel and website, as well as shared on social media. Belmont also pushed these information videos out on all our local communication channels.

1.6 PUBLIC MEETINGS AND HEARINGS

Belmont held and participated in a variety of virtual meetings, primarily virtual, to inform the public about the Housing Element and hear what matters most to the community. While in-person meeting space was available for some of the more recent Housing Element study

sessions, Belmont found that most community members enjoyed the flexibility of participating virtually. Meetings were designed to keep Belmont officials and community members aware of the process timeline, provide input on the different steps and draft information as it became available, and engage in discussion with City staff to share concerns, questions, or support for housing policies.

INTRODUCTORY MEETING TO THE HOUSING ELEMENT UPDATE

Belmont participated in a collaborative virtual countywide meeting about the Housing Element update. Held on April 8, 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. Belmont staff facilitated a breakout room 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 and, more importantly, who was missing from the conversation. This included collecting information on whether they rented or owned, who they lived with, and their age and ethnicity. Time for questions was allotted throughout, and after the meeting, a meeting survey was provided to all participants, along with all discussed resources and links. Thirty-five people registered for the meeting, six of whom lived in Belmont. Of the participants, five said that they had lived in the City for over 21 years, and all of the residents owned their own homes. Of the participants, five identified as White and one as Asian, and the majority (66%) were between the ages of 50 and 69.

In total, 1,024 people registered for the meeting 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.

ALL ABOUT RHNA WEBINAR

Belmont helped promote the "All About RHNA" webinar hosted by 21 Elements 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 at <https://www.letstalkhousing.org/past-events>.

STAKEHOLDER LISTENING SESSION SERIES

Belmont joined 21 Elements for a facilitated series of four listening sessions held between September and November 2021 to hear from various stakeholders who operate countywide or across multiple jurisdictions. The sessions convened over 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 of each session can be found at <http://www.21elements.com/community-engagement>.

Key themes and stakeholder groups included the following.

- **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. The following eight stakeholder groups provided this feedback.
 - 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. The following six stakeholder groups provided this feedback.
 - 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. The following 12 stakeholder groups provided this feedback.
 - 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. The following ten stakeholder groups provided this feedback.

- 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

CREATING AN AFFORDABLE FUTURE WEBINAR SERIES

Belmont and 21 Elements offered a four-part countywide webinar series in 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 at <https://www.letstalkhousing.org/past-events>.

The following topics, and how each intersects with regional housing challenges and opportunities, were explored.

- **Why Affordability Matters** – Why housing affordability matters to public health, community fabric and to county residents, families, workers, and employers
- **Housing and Racial Equity** – Why and how our communities have become segregated by race, why it is a problem, and how it has become embedded in our policies and systems
- **Housing in a Climate of Change** – What is the connection between housing policy and climate change and a walk through the Housing and 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 questions and answers, 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 feedback in a post-event survey. Overall, comments were 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 housing that is affordable), concern about change or impacts to 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 next steps, while others had more basic questions.

In total, 754 registered for the series. Of those who shared, the majority identified as White (55%) or Asian (24%) and ranged between 30 and 70 years old. Over half have lived in the county for over 21 years and nearly two-thirds owned their homes. For more information, see the Summary at <http://www.21elements.com/community-engagement>.

CITY OF BELMONT PUBLIC MEETINGS

- **City Council Public Study Session (May 11, 2021)** – The purpose of this meeting was to introduce the draft RHNA allocation process and numbers, show the City Council and community members the proposed update timeline, and talk about some of the new topics that would be included in the updated Housing Element.
- **City Council Public Meeting (January 11, 2022)** – This was another virtual check-in with the City Council and community on progress made towards the Housing Element update, with an emphasis on work completed in preparing an Environmental Impact Report.
- **Affirmatively Furthering Fair Housing Workshop (March 23, 2022)** – This was a virtual community meeting to review Affirmatively Further Fair Housing (AFFH) and new Housing Element requirements. This workshop was promoted heavily on the City’s social media channels and all housing units in the City of Belmont received a direct postcard mailing with information in English, Spanish, and Chinese promoting the workshop and inviting people to take the online AFFH survey. The offer for translation services was made but no requests were received.
- **City Council Public Study Session (April 26, 2022)** – This presentation focused on reviewing draft Housing Sites, AFFH assessment, and draft Housing Element programs. This meeting was the first deep dive into the Housing Element documents and data, and the study session format allowed the Council to ask many questions about new topics like AFFH.
- **Planning Commission Public Study Session (May 17, 2022)** – This presentation also focused on reviewing draft housing sites, AFFH assessment, and draft Housing Element programs. This highly-attended meeting was an opportunity for both the Planning Commission and the Belmont community to dive into some of the important components of the Housing Element update. A lot of community feedback centered on the draft housing opportunity sites and concerns about locating a majority of the proposed housing sites along the El Camino Real and Old County Road corridors.
- **Housing Element Community Workshop (June 27, 2022)** – As a follow up to the Planning Commission meeting held in May, the City held a community workshop to discuss the RHNA allocation process, the housing sites methodology, and some of the land use changes proposed for the next Housing Element cycle. This meeting was attended by 71 people, and was hosted by City staff from Housing, Finance, Public Works, Parks and Recreation, and Planning Departments. Staff’s presentation aimed to show how housing and population growth are guiding principles in the work done by all City departments. Specific feedback on housing opportunity sites included a desire to limit building heights, provide more parking, and address traffic impacts.

- **Planning Commission Draft Housing Element and EIR Review (July 19, 2022)** – This was a well-attended meeting for Planning Commission consideration of the full draft Housing Element and draft Environmental Impact Report (EIR). The meeting was available to attend both in-person and virtually and the Commission heard over 45 public speakers, ultimately making a series of recommendations to the City Council for modifications to the rezoning programs and Sites Inventory.
- **City Council Draft Housing Element and EIR Review (July 26, 2022)** – This was another well-attended public meeting that lasted over 4 hours, with more than 45 in-person and virtual speakers. Ultimately, the Council concurred with the Planning Commission recommendations to modify the proposed zoning amendments and remove sites from the Housing Sites Inventory.
- **Planning Commission Housing Element and EIR Review (January 17, 2023)** – At this meeting, the Planning Commission reviewed the revised draft of the Housing Element and final EIR and recommended that the City Council adopt the Housing Element and certify the EIR.
- **City Council Public Meeting Certifying the Final Programmatic EIR and Adopting the 2023-2031 Housing Element (January 30, 2023)** – At this meeting the City Council adopted the Housing Element and certified the EIR.
- **City Council Public Study Session (September 26, 2023)** – This presentation focused on reviewing additional policies related to AFFH and provide an update on the revisions made in response to the April 2023 HCD comment letter.
- **City Council Public Study Session (March 26, 2024)** – This presentation focused on new Housing Mobility programs in response to HCD comments that will support more housing opportunities across the city, specifically targeting low-density neighborhoods in response to the December 2023 HCD comment letter.

1.7 OTHER COMMUNITY OUTREACH STRATEGIES

Belmont set out to collect as much feedback as possible from the community, and to ensure we were reaching as many people as possible and doing so thoughtfully. Acknowledging that virtual engagement was not always accessible for all community members, the City has tried to reach all Belmont residents by sending information directly to them.

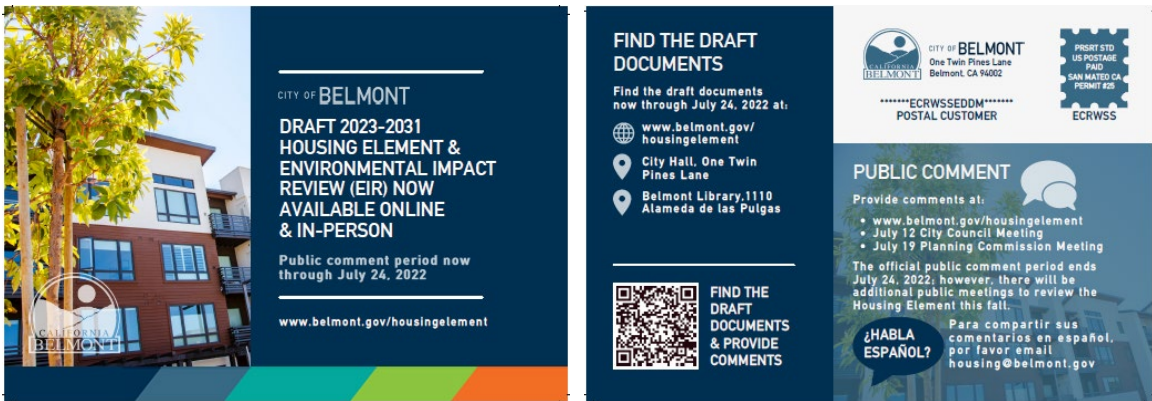
- **Two Direct Mailer Postcards** – Belmont sent two Housing Element update postcard mailers to every residential unit in the City of Belmont. To generate this mailing list, the City reached out to residential facilities where individual housing/residential units don't typically show up on a community mailing list. This included two special needs group homes and two senior assisted living facilities. The City also made the mailers available at the Twin Pines Senior and Community Center grab-and-go lunch program, and at City Hall. The postcards included verbiage in English, Spanish, and Chinese, informing residents about upcoming community workshops, with a QR code and web addresses inviting them to provide feedback to the City via online surveys, email, or directly contacting City staff.

The City has received positive feedback from residents who received the postcards and were able to participate in engagement activities.

Community Mailer Postcard #1 (front and back)



Community Mailer Postcard #2 (front and back)



- Affirmatively Furthering Fair Housing Survey** – As is summarized in the AFFH Appendix, 21 Elements conducted a countywide survey of San Mateo County residents to support the AFFH analysis of Housing Elements. Survey questions explored residents perceptions of housing, affordability, and neighborhood challenges, as well as experiences with displacement and housing discrimination. It also asked about residents’ access to economic opportunity, captured through their reported challenges with transportation, employment, and K-12 education. The survey 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 survey was available online, in both Spanish and English, in a format accessible to screen readers, and promoted through jurisdictional communications and social media as well as partner networks. Out of the 2,382 respondents, 89 were Belmont residents.

- **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 countywide 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 was to provide more focused support in 2022 based on jurisdictional needs and organizational 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 to their communities. The EAG continue 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 Latins A Soñar (ALAS) www.alashmb.org
 - Community Legal Services www.clsepa.org
 - El Comité de Vecinos del Lado Oeste (El Comité) www.tenantstogether.org/resources/el-comité-de-vecinos-del-lado-oeste-east-palo-alto
 - EPACANDO www.epacando.org
 - Faith in Action www.faithinaction.org/federation/faith-in-action-bay-area/
 - Housing Choices www.housingchoices.org
 - Housing Leadership Council www.hlcsmc.org
 - Menlo Together www.menlotgether.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.getthehealthysmc.org
 - Youth Leadership Institute www.yli.org/region/san-mateo
 - Youth United for Community Action www.youthunited.net
- **Interactive Housing Sites Inventory Map** – In July 2021, as part of the California Environmental Quality Act (CEQA) Environmental Impact Report scoping process, the City created an interactive map of the draft Housing Sites Inventory. The map enabled viewers to scroll around the City and select specific parcels to get additional information such a land use, zoning, and property size. During the required public comment period, map viewers were able to use the mapping tool to provide specific comments or feedback directly onto any of the draft housing opportunity sites. This interactive tool was successful at enabling the City to obtain site-specific comments and feedback on the draft Housing Sites Inventory, but to also provided a platform for residents to share their concerns about a significant growth in housing development in Belmont. Neighbors expressed concerns

English	Chinese Simplified
If you are unable to attend the community meeting, or would prefer to provide feedback in Simplified Chinese, please complete this brief survey	如果您不能参加社区会议，或希望用简体中文提供反馈意见，请完成此简短调查。

Example of Printed Material Translation

- **Resident Housing Surveys** – The City participated in the ABAG Regional Housing Technical Assistance (RHTA) online housing survey, which was made available in English, Spanish, Tagalog, Vietnamese, and simplified Chinese. Belmont also participated in a countywide fair housing survey, which was available online, in both Spanish and English, in a format accessible to screen readers, and promoted through City communications and social media as well as through partner networks. Out of the 2,382 respondents, 89 were Belmont residents.
- **Equity Advisory Group** – Belmont participated in an EAG with 21 Elements to ensure outreach was designed to meet with community stakeholders where they were at as much as possible. The EAG consisting of 18 organizations across San Mateo County that provided feedback on outreach and materials and shared information about the Housing Element update and how to participate in the process with the communities they serve. In addition, Belmont has provided direct Housing Element updates, meeting invitations, and other related Housing Element development materials to various housing service providers who have been engaged with the City during the two-year process. See above for more details on the EAG effort and community participants.
- **Accessible City Housing Element Website** – The City created a Housing Element update website that was mobile friendly, with accessibility features and in multiple languages, recognizing that lower-income residents, young adults, and people of color are more likely to use their phones to access information about the Housing Element process.

RESOLUTION NO. 2024 – 62

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF BELMONT TO ADOPT A GENERAL PLAN AMENDMENT TO REPEAL THE PREVIOUSLY ADOPTED 2023-2031 HOUSING ELEMENT AND ADOPT THE REVISED HOUSING ELEMENT OF THE 2035 GENERAL PLAN FOR THE PERIOD OF 2023-2031, IN COMPLIANCE WITH STATE HOUSING ELEMENT LAW

WHEREAS, the California Legislature has found that “California has a housing supply and affordability crisis of historic proportions. The consequences of failing to effectively and aggressively confront this crisis are hurting millions of Californians, robbing future generations of the chance to call California home, stifling economic opportunities for workers and businesses, worsening poverty and homelessness, and undermining the state’s environmental and climate objectives” (Gov. Code Section 65589.5.); and,

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

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

WHEREAS, State Housing Element Law (Government Code Sections 65580 et seq.) requires that the City of Belmont adopt a Housing Element for the eight-year period 2023-2031 to accommodate the City of Belmont's ("City") regional housing need allocation ("RHNA") of 1,785 units, comprised of 488 very low-income units, 281 low-income units, 283 moderate income units, and 733 above moderate-income units; and,

WHEREAS, to comply with State Housing Element Law, the City has prepared the Housing Element 2023-2031 (the "Housing Element") in compliance with State Housing Element Law and has identified sites that can accommodate housing units meeting the City’s RHNA allocation; and,

WHEREAS, as provided in Government Code Section 65350 et. seq., adoption of the Housing Element constitutes a General Plan Amendment; and,

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

WHEREAS, the City conducted extensive community outreach related to the Housing Element, beginning in May 2021, including hosting multiple community workshops, Planning Commission and City Council hearings, as described in detail in Appendix E to the proposed Housing Element Update; and,

WHEREAS, Government Code Section 65583.2(g)(2) requires that any jurisdiction relying on non-vacant sites to meet more than 50 percent of the RHNA for lower-income households must make findings based on substantial evidence that the existing use on the non-vacant site is not an impediment to residential development during the planning period; and,

WHEREAS, the City has followed HCD guidance when performing its analysis of non-vacant sites under Government Code Sections 65583(g)(1) and 65583.2(g)(2) and has provided substantial evidence in Chapter 6 of the revised Housing Element that the existing uses are likely to be discontinued and will not be an impediment to additional residential development during the planning period based on the physical characteristics, existing uses, redevelopment potential (including improvement to land ratio, age of structures, building stories, lot coverage), known developer/owner interest, the City's past experience with converting existing uses to higher density residential development, the current market for the existing uses, an analysis of existing leases to the extent information is known, development trends for other non-vacant sites on which development applications have been filed in Belmont and in other nearby cities in the region, and the significant regulatory incentives to encourage additional residential development on these sites; and

WHEREAS, in accordance with Government Code Section 65585(b), on July 1, 2022, the City posted the draft Housing Element and requested public comment for a 45-day review period, and on August 24, 2022, after responding to public comments, the City submitted the draft Housing Element to the State Department of Housing and Community Development (HCD) for its review; and,

WHEREAS, on November 22, 2022, the City received a letter from HCD providing its findings regarding the draft Housing Element; and,

WHEREAS, in accordance with Government Code Section 65585 (b) on January 13, 2023, the City published a revised draft Housing Element responding to HCD's findings and requested public comment; and,

WHEREAS, The City of Belmont prepared a Final Programmatic Environmental Impact Report (EIR) for the Belmont Housing Element 2023-2031 update pursuant to the California Environmental Quality Act (CEQA); and

WHEREAS, the City Council adopted Resolution No. 2023-008 on January 30, 2023, certifying a programmatic Environmental Impact Report (EIR) for the Housing Element 2023-2031 that analyzed the reasonably foreseeable and potentially significant adverse effects of the proposed project pursuant to the California Environmental Quality Act (CEQA); and,

WHEREAS, on January 30, 2023, the City Council adopted a General Plan Amendment to repeal the 2015-2023 Housing Element and adopt the Housing Element of the 2035 General Plan for the period of 2023-2031, in compliance with State Housing Element Law and submitted the 2023-2031 Housing Element to HCD for its review; and

WHEREAS, on April 3, 2023, the City received a letter from HCD providing its findings regarding the adopted Housing Element; and,

WHEREAS, in accordance with Government Code Section 65585 (b), on October 11, 2023, the City published a revised draft Housing Element responding to HCD's findings and requested public comment on the draft for a 7-day review period, and on October 19, 2023, after responding to public comments, submitted the document to HCD for its review; and,

WHEREAS, on December 18, 2023, the City received a letter from HCD providing its findings regarding the draft revised Housing Element; and,

WHEREAS, in accordance with Government Code Section 65585 (b), on May 21, 2024, the City published a revised draft Housing Element responding to HCD's findings and requested public comment on the draft for a 7-day review period, and on May 28, 2024, after receiving no public comments, submitted the document to HCD for its review; and,

WHEREAS, in accordance with Government Code Section 65585 (b), on July 18, 2024, the City posted a revised draft of the Housing Element and requested public comment for a 7-day review period, and on July 25, 2024, after receiving no public comments, the City resubmitted the draft revised Housing Element to HCD for its review; and,

WHEREAS, on July 26, 2024, the City received a letter from HCD, provided as Exhibit A to this resolution, stating that the revised draft Housing Element meets the statutory requirements of the State Housing Element Law and that the Housing Element will substantially comply with State Housing Element Law (Gov. Code Sections 65580 et seq) when it is adopted, submitted to, and approved by HCD, in accordance with Government Code section 65585; and,

WHEREAS, on August 20, 2024, the Planning Commission held a duly and properly noticed public hearing and recommended that the City Council repeal the previously adopted Housing Element adopt the revised Housing Element; and,

WHEREAS, on September 10, 2024, the City Council conducted a duly and properly noticed public hearing to take public testimony and consider this Resolution regarding the proposed revised Housing Element, reviewed the Housing Element and all pertinent maps, documents and exhibits, including HCD's findings, the City's response to HCD's findings, the staff report and all attachments, and oral and written public comments; and,

NOW, THEREFORE, the City Council of the City of Belmont resolves as follows:

SECTION 1. The foregoing recitals are true and correct and are incorporated by reference into this action.

SECTION 2. The Housing Element substantially complies with State Housing Element Law.

SECTION 3. The City Council finds, based on substantial evidence and information provided in the record, including Chapter 6 of the Housing Element, that the existing uses on the non-vacant sites identified in the site inventory to accommodate the RHNA are likely to be discontinued during the planning period and therefore do not constitute an impediment to planned residential development on the site during the planning period.

SECTION 4. As required by Government Code § 65585(e), the City Council has considered the findings made by the Department of Housing and Community Development included in the Department's letter to the City dated July 26, 2024 (Exhibit A to this resolution).

SECTION 5. The City Council finds the revisions proposed in the Housing Element would not add any sites for multifamily housing from those in the formerly approved Housing Element analyzed in the program EIR. Likewise, no revisions are proposed which would alter or modify regulations in regard to density of development, scale of buildings, infrastructure, land uses or location which were not analyzed in the EIR. For this reason, the revised Housing Element is within the scope of the program EIR, and no subsequent or supplemental EIR is needed for these amendments, in that the changes are not substantial; and no substantial evidence exists showing that: (1) the changes in the Element will involve any new significant environmental effects or a substantial increase in the severity of previously identified environmental effects; (2) circumstances have changed since the EIR was certified; or (3) new information is available, which was not known and could not have been known when the EIR was certified, that shows that the Housing Element will have significant impacts not considered in the EIR. (CEQA Guidelines Sections 15168 and 15162.)

SECTION 6. The City of Belmont 2023-2031 Housing Element is hereby repealed in its entirety, and the revised City of Belmont 2023-2031 Housing Element, attached hereto as Exhibit B, incorporated by this reference.

SECTION 7. This resolution shall become effective immediately upon its adoption.

SECTION 8. The Community Development Director or designee is hereby directed to file all necessary materials with the Department of Housing and Community Development for the Department to find that the Housing Element is in conformance with State Housing Element Law and is further directed and authorized to make non-substantive changes to the Housing Element to make it internally consistent or to address any non-substantive changes or amendments required by the Department to achieve a finding of substantial conformance with State Housing Element Law.


SECTION 9. The Community Development Director or designee is hereby directed to distribute copies of the Housing Element in the manner provided in Government Code §§65357 and 65589.7.

* * *

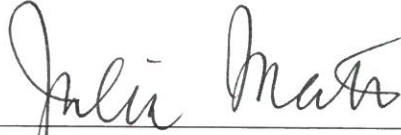
ADOPTED September 10, 2024, by the City of Belmont City Council by the following vote:

Ayes: McCune, Pang-Maganaris, Hurt, Latimerlo, Mates

ATTEST:

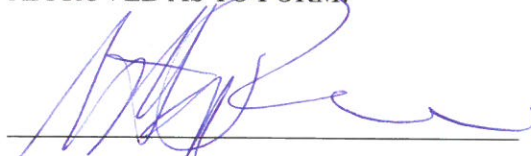


City Clerk



Mayor

APPROVED AS TO FORM:



City Attorney

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

651 Bannon Street, Suite 400
Sacramento, CA 95811
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov



July 26, 2024

Afshin Oskoui, City Manager
City of Belmont
1 Twin Pines Lane
Belmont CA, 94002

Dear Afshin Oskoui:

RE: City of Belmont's 6th Cycle (2023-2031) Revised Draft Housing Element

Thank you for submitting the City of Belmont's (City) revised draft housing element received for review on May 28, 2024, along with revisions received on July 26, 2024. The revisions were posted and made available to the public for seven days prior to review. Pursuant to Government Code section 65585, the California Department of Housing and Community Development (HCD) is reporting the results of its review.

The revised draft housing element, incorporating the revisions, meets the statutory requirements of State Housing Element Law, including requirements described in HCD's December 18, 2023 review. In addition, this finding of compliance was based upon the adoption of Ordinance Number 2024-1175 to make prior identified sites available for lower-income households. The housing element will substantially comply with State Housing Element Law (Gov. Code, § 65580 et seq) when it is adopted, submitted to, and approved by HCD, in accordance with Government Code section 65585.

As a reminder, the City's 6th cycle housing element was due January 31, 2023. As of today, the City has not completed the housing element process for the 6th cycle. The City's 5th cycle housing element no longer satisfies statutory requirements. HCD encourages the City to adopt and submit to HCD to regain housing element compliance.

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City must continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available while considering and incorporating comments where appropriate. Please be aware, any revisions to the element must be posted on the local government's website and to email a link to all individuals and organizations that have previously requested notices relating to the local government's housing element at least seven days before submitting to HCD.

In addition, as noted in the housing element, the housing element relies upon nonvacant sites to accommodate more than 50 percent of the Regional Housing Needs Allocation (RHNA) for lower-income households. For your information, the housing element must demonstrate existing uses are not an impediment to additional residential development and will likely discontinue in the planning period (Gov. Code, § 65583.2, subd. (g)(2).). Absent findings (e.g., adoption resolution) based on substantial evidence, the existing uses will be presumed to impede additional residential development and will not be utilized toward demonstrating adequate sites to accommodate the RHNA.

Please note, upon adoption of the housing element, the City must submit an electronic version of the sites inventory with its adopted housing element to sitesinventory@hcd.ca.gov. Pursuant to Government Code section 65583.3, subdivision (b), the City must utilize standards, forms, and definitions adopted by HCD when preparing the sites inventory. Please see HCD's housing element webpage at <https://www.hcd.ca.gov/planning-and-community-development/housing-elements> for a copy of the form and instructions. The City can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance.

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

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

HCD appreciates the hard work and dedication Kathy Kleinbaum, Assistant City Manager, and Laura Russell, Deputy Community Development Director provided in preparation of the City's housing element and looks forward to receiving the City's adopted housing element. If you have any questions or need additional technical assistance, please contact Andrea Grant, of our staff, at andrea.grant@hcd.ca.gov.

Sincerely,



Paul McDougall
Senior Program Manager

Please Start Here, Instructions in Cell A2, Table in A3:B17

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. Sites Inventory Form, Version 2.4, Updated February 7, 2024.

General Information

Jurisdiction Name

Housing Element Cycle

Contact Information

First Name

Last Name

Title

Email

Phone

Mailing Address

Street Address

City

Zip Code

Website

--

Form Fields

BELMONT

6th

Kathy

Kleinbaum

Assistant City Manager

kkleinbaum@belmont.gov

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www.belmont.gov

