



SAN MATEO, SANTA CLARA & SAN BENITO COUNTIES

April 26, 2022

City of San Mateo City Council  
330 West 20th Avenue  
San Mateo, CA 94403

Subject: **San Mateo 2023-2031 Housing Element - Draft**

Dear Mayor Bonilla and Members of the San Mateo City Council and Planning Commission,

The Sustainable Land Use Committee of the Loma Prieta Chapter of the Sierra Club (SLU) advocates on land use issues in San Mateo and Santa Clara Counties. Thank you for providing the opportunity for SLU to provide input on the Draft San Mateo 2023-2031 Housing Element.

The overall draft Housing Element (HE) is a good start, but more focused and stronger policies and programs are needed to have a reasonable expectation of meeting the RHNA number of 7,015 new housing units, particularly for affordable units.

Reaching the RHNA unit goal will require major changes in the speed of development in San Mateo. In order to reach the goal of 7,015 new units from 2023-2031, the city must add almost 900 new units each year. That is roughly the equivalent of building a new Concar Passage each year<sup>1</sup>. This will be infeasible unless a major effort is made to streamline and accelerate housing development. And, of course, it is important that new development also be thoughtfully designed to accomplish all the other General Plan goals of open space, quality of neighborhoods, etc. The HE Housing Plan (p.H-55 to H-74) needs to demonstrate a significant change to current policies and programs in order to realistically be able to reach the goal. This will not be easy, as the new RHNA goals are well above the rate of new housing added over the last few decades<sup>2</sup>. But it must be done if we are to adequately address the housing crisis in the region and leave the city well positioned for future generations to prosper.

The HE rightly points out that the housing problem is a regional one and that each city needs to meet or exceed its goal if the housing crisis, particularly for affordable housing, is to be solved. The lack of affordable housing on the Peninsula is a significant contributor to environmental degradation as workers must commute long distances by car, emitting GHG as well as other pollutants. It also leads to sprawl as more development is done in areas that were open space or agricultural land.

There are specific areas that will need to be retained or expanded to make sure the final HE contains the key actions needed to make significant progress on addressing the enormous lack of affordable housing

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<sup>1</sup> **Concar Passage** is the largest housing project approved in recent years and required major time and effort for approval. Developing a project like this each year, will therefore require a major effort above the current processes.

<sup>2</sup> **The 2015-2022 RHNA** was 3,164 units and with only one year left it has 2,573 units completed. This current RHNA number is less than half the new RHNA number; thus, demonstrating the steep challenge of meeting the new RHNA number of 7,015.

in the Bay Area. Listed below are the most important goals, policies and programs in the draft HE that need to be retained and strengthened in the final HE.

1. The HE aims for a 56% buffer above the RHNA. This is a minimum, but perhaps a higher number should be considered as the ability to actually build out housing has proven, over time, to be very difficult.
2. Increasing affordable housing is emphasized in the draft HE and that is good. But the “buffers” for affordable housing levels are only 14%, 55% and 37%, while the buffer for market rate housing is 87%. The percentage buffer for affordable units should be at least as high as the buffer for market units since affordable units are needed more and are harder to develop. The affordable housing should be more strongly focused on low, very low and extremely low-income housing, as these are where the largest needs are and where the lack of inventory is the largest. The very poor jobs/housing fit<sup>3</sup> in the Peninsula can best be addressed with a focus on more affordable housing. As noted in the HE draft<sup>4</sup>, the lack of affordable housing was one of the major concerns expressed by the public.
3. Funding that can be used to support affordable housing is a fundamental need and more must be done to obtain funding. Affordable housing has to be subsidized and a lack of funding will limit the ability to build the needed affordable housing, particularly for low and very low-income units. This could include establishing or increasing: Vacancy Tax, Commercial Linkage Fees, and Transfer Tax. It is particularly important that funding focus on repairing the legacy of discrimination in housing for groups like African Americans. The following policies and programs should be strengthened to accomplish this goal:
  - a. H 1.2 - Utilize Public Funding for Low/Moderate Income Housing
  - b. H 1.3 - Increase Below Market Rate Unit Production through Density Bonus/Community Benefits Programs
  - c. H 1.18 – Fee Schedule Review
  - d. H 3.3 - Evaluate Housing Revenue Sources
  - e. H 5.1.1 - Adjust the City's Below Market Rate (inclusionary) program to provide larger density bonuses, and/or increased city support in exchange for affordable units that address the needs of residents with disproportionate housing needs
  - f. H 5.1.2 - Participate in a regional down payment assistance program with affirmative marketing to households with disproportionate housing needs including persons with disabilities, single parents, and Hispanic households
  - g. H 5.1.3 - Support the design of a regional forgivable loan program for homeowners to construct an ADU that is held affordable for extremely low-income households for 15 years
4. In addition to increased funding for affordable units, the HE should prioritize policies and programs that reduce costs and streamline the processes for affordable units. The following policies and programs should be strengthened to accomplish this need:

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<sup>3</sup> **Jobs/Housing Fit:** Jobs/housing fit means that the majority of homes within the city are affordable to the majority of employees who work in the city, and conversely, the jobs in the city pay enough to cover the cost of housing in the city. Without an adequate jobs/housing fit, businesses find it difficult to hire and retain lower-income employees.

<sup>4</sup> **Page H-43**

- a. H 1.6 - Streamline Housing Application Review
- b. H 1.8 - Adopt Objective Design Standards
- c. H 1.9 - Create Minimum Densities for Mixed-Use Residential Projects
- d. H 1.10 - Establish By-Right Housing Designation for Prior Housing Sites
- e. H 1.12 - Encourage Residential Uses within Housing Overlay

5. Almost the entire city, including R1 areas, will need to contribute to the increased housing through such mechanisms as expanded Missing Middle Units (duplex, triplex and fourplex) and ADUs and, possibly, new mechanisms enabling multi-unit housing on properties with a Residential Neighborhood General Plan land use designation, which generally covers single-family neighborhoods. Increased density should be focused within half mile of transit to align with Climate Action Plan goals for greenhouse gas reductions.

The Climate Action Plan requires attention to creating easy pedestrian and bicycle access to reduce greenhouse gas emissions (GHG). Therefore, while it is important to retain this broad opportunity for more housing, since R1 is a major part of the total area of the city, it is important to keep in mind that creating easy pedestrian and bicycle access to amenities and to transit is a critically important goal for the Climate Action Plan.

The “15-minute Neighborhood”<sup>5 6</sup> concept needs to be included in the General Plan, along with the Housing Element, as it would facilitate creating more housing in R1 neighborhoods while simultaneously reducing GHG. This is a mechanism that would insert community amenities, such as small neighborhood retail nodes, into otherwise auto-dominated areas such as R1 neighborhoods.

Even more priority should be placed on these efforts. The following policies and programs should be strengthened to accomplish this need:

- a. H 1.4 - Incentivize Accessory Dwelling Units Development with streamlined approvals, development subsidies, or low or zero interest loans for construction cost
- b. H1 11 Consider how Opportunity Housing can be useful to create new housing in R1 neighborhoods within 1/2 mile of the transit corridors
- c. H1-13- Encourage Development of Missing Middle Housing especially within a half mile of transit.
- d. Include overlay zoning, in the General Plan, for “15-minute Neighborhoods” allowing insertion of small new neighborhood retail nodes with [Green Streets](#) network<sup>7</sup> to create walkable bikeable neighborhoods, with the daily amenities, to reduce auto trips and create healthier walkable neighborhoods, convenient for all ages including kids and seniors.

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<sup>5</sup> 15-minute neighborhoods are being created in many cities especially post-COVID.

<https://www.strongtowns.org/journal/2019/9/6/7-rules-for-creating-15-minute-neighborhoods> )

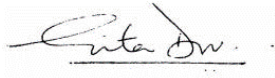
<sup>6</sup> Embraced by Mayors around the world, Portland and several small US cities have embraced the concept to rebuild their economies while creating healthier cities. [https://en.wikipedia.org/wiki/15-minute\\_city](https://en.wikipedia.org/wiki/15-minute_city)

<sup>7</sup> How to insert a Green Street network into an existing City. Sierra Club Loma Prieta <https://www.sierraclub.org/sites/www.sierraclub.org/files/sce-authors/u4142/Green%20Streets%20Presentation%20-%201-20-21%20DC.pdf>

5. Climate Change is real. <sup>8</sup>No mention is made of how housing, particularly new housing, needs to be located so as to be resilient to climate change. Sea levels are predictably going to rise more swiftly in the coming decades, according to the California Ocean Protection Council. <sup>9</sup> Wildfires are also predicted to become an increased threat with the continued drought and encroachment into the forested hill areas of our city. The increased risks of sea level rise (SLR) near the Bay and wildfires in the hilly areas needs to be factored into identifying areas for higher density and more affordable housing.

We ask that you consider this information as you finalize the Housing Element for submission to the State. SLU is prepared to help the City in advancing the HE as it is finalized and when it goes into effect.

Respectfully submitted,



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<sup>8</sup> **Ocean Protection Council- Sea Level Rise Guidance:** The rate at which sea levels will rise can help inform the planning and implementation timelines of state and local adaptation efforts. Understanding the speed at which sea level is rising can provide context for planning decisions and establish thresholds for action...  
[https://opc.ca.gov/webmaster/ftp/pdf/agenda\\_items/20180314/Item3\\_Exhibit-A\\_OPC\\_SLR\\_Guidance-rd3.pdf](https://opc.ca.gov/webmaster/ftp/pdf/agenda_items/20180314/Item3_Exhibit-A_OPC_SLR_Guidance-rd3.pdf)